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1.	4) A moratorium on wind power developments on and crossing Federal Lands. Wind power development causes roads, vehicles, power lines and fences to be built. All this adds up to more disturbance than the sage grouse leks will bear.	All	Both	emc0011GB
2.	The EIS must examine the negative economic impacts to Renewable Energy in detail; such as publically subsidized tax breaks to developers; and loss to visual amenities (both day and nighttime) and viewscapes will have on regional tourism and recreation. For example, in Union and Baker counties there has been no significant increase in employment owing to the wind farm near Telocaset. There has been no significant rural development related to the Renewable Energy project, other than the wind farm and transmission lines.	All	Both	rmc0036GB
3.	keep wind farms, transmission lines and other developments off of high priority sage-grouse areas.	All	Both	cfc0019GB
4.	While examining the BLM maps and displays I noted that there was substantial area within the sage grouse range designated for the development of wind generated electricity. I believe there should be a moratorium on wind power development on all government lands but particularly on federal lands where Land Use Plans (LUPs) are being revised to facilitate conservation of candidate species such as sage grouse. My position is based the following points: - development of wind farms is totally dependent on government subsidies - wind farms have an incredibly high kill rate for birds - wind farms have proven to be unsustainable over time.	All	Both	rmc0038GB
5.	Much of Lassen County contains sagebrush steppe habitat. The obvious reason to not permit siting of wind farms in the county is because of the potential mortality to sage grouse and other wildlife species during the operational phase. A less obvious reason is the negative impact construction of wind farms would have on the long-term economic viability of the county	All	Both	rmc0038GB
6.	Should the siting of wind farms be permitted under revised LUPs, within sage grouse management areas, then at minimum the developers and operators of those wind farms should be required to post reclamation bonds to cover the entire cost of returning wind farm sites to pre-disturbance conditions. Other energy industries that disturb or impact spatially large areas of ground are required to post reclamation bonds. Reclamation bonds would not reduce sage grouse mortality during the operational phase of a wind farms. However, reclamation bonds would ensure that failed wind farm sites could be returned to historic land use condition and not become visual blights on the landscape.	All	Both	rmc0038GB
7.	There is mounting evidence that absent significant government subsidies, wind power is neither economical nor sustainable and reclamation bonds should be imposed if they are constructed. The long-term economic viability of rural western counties must be considered when proposed revisions to LUPs are implemented.	All	Both	rmc0038GB
8.	March 2010, the U.S. Fish and Wildlife Service (USFWS) made a finding of "warranted but precluded" regarding a petition for listing of the greater sage-grouse as threatened or endangered under the Endangered Species Act (ESA).5 In its finding, USFWS noted that greater sage-grouse now occupy only 56% of their historical territory (an area of 258,075 mi2), and that habitat loss is a primary threat to the species. Energy development related to fossil fuel extraction and infrastructure was identified as a large contributor to the habitat loss.6 While renewable energy development was also recognized to have habitat impacts, USFWS did not describe related land use as intense as that for fossil fuel development.	All	Both	emc0110GB
9.	Notably, BLM, in its Notice of Intent (NOI), highlighted renewable energy development and transmission among preliminary	All	Both	emc0110GB

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	issues that must be considered in the Environmental Impact Statement (EIS) scoping process. Moreover, BLM and the USFWS have stated that they will "focus on the relative value of resources while contributing to the conservation of the greater sage-grouse and sage-grouse habitat."10 While SEIA applauds BLM's recognition that public land can support a variety of important resources, overly restrictive rules related to habitat conservation could stifle future utility-scale solar development. Flexibility in land use permitting is needed to keep pace with the fast-growing and ever evolving solar industry, and help increase investment in a clean, renewable energy source that creates jobs.			
10.	SEIA requests that BLM clarify how it will address sage grouse conservation in conjunction with the ongoing Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (PEIS) process and ensure that solar energy development remains a priority both within the solar energy zones (SEZs) and the areas outside of those zones.	All	Both	emc0110GB
11.	III. BLM Should Continue to Prioritize Solar Energy Development in the PEIS and Clarify the Sage Grouse Conservation Process In the October 2011 Supplement to the Draft PEIS, BLM reduced the already limited opportunities for solar energy development in the SEZs by over 50 percent (in terms of acres). Now, less than 225,000 acres are actually available for new projects within the 17 remaining SEZs, but BLM has determined that these remaining acres are highly suitable for solar development. However, to meet the objectives of BLM's sage-grouse conservation policy, the revised Appendix J to the Supplement to the Draft PEIS indicates that further reductions in land within the SEZs may be necessary due to possible sage-grouse occurrence in areas of the proposed Escalante Valley, Gold Point, Milford Flats South, Millers and Wah Wah Valley SEZs.11 According to the Supplement to the Draft PEIS, greater sage-grouse occupy approximately 8% of the acres within the SEZs and the variance areas combined, but their territory spans across RMPs in California, Colorado, Nevada, New Mexico, and Utah.12 Moreover, the Supplement to the Draft PEIS requires solar projects be "at least 3 mi (5 km) from the nearest lek [breading ground]."13 It also would prohibit development on lands "where BLM has made a[n unspecified] commitment to take certain actions with respect to sensitive species habitat, including, but not limited to sage grouse core areas, nesting habitat, and winter habitat . . . ."14 This standard should specifically identify authoritative commitments that could properly prohibit development and how they are established. Moreover this biological reason for excluding lands requires further definition and a sound legal or scientific basis for their imposition. This exclusion is vague and destined to be applied inconsistently across different decision makers. Finally, this restriction could constitute a larger portion of public land than expected.	All	Both	emc0110GB
12.	SEIA requests that BLM provide clarification as to how this sage grouse conservation process will proceed in conjunction with the PEIS process. While the potential overlap between RMPs and SEZs may be low, as noted above, rigid conservation strategies may impede solar energy development by further decreasing the already minimal amount of land available for solar development in the PEIS.	All	Both	emc0110GB
13.	SEIA further recommends that BLM fully explore the availability of mitigation measures and proactive conservation practices as an alternative to further reductions within SEZs and variance areas. By using flexible approaches, it should be possible to develop site-specific conservation tools that allow for the protection of sage-grouse and sage-grouse habitat without the need for removing even more land from potential renewable energy development. For example, lands suitable for solar energy development could be subject to adaptive management tools, mitigation banks, or pre-listing or pre-compliance conservation agreements that would keep those areas open for leasing and project siting while meeting the biological needs	All	Both	emc0110GB

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	of sage-grouse. Creative use of existing land and species conservation mechanisms should make it possible to keep all of the lands in Figure 1 available for development, with exclusion from solar project sitting ebbing used as only a last resort.			
14.	In conclusion, SEIA is supportive of BLM's efforts to conserve the greater sage-grouse and its habitat with the goal of developing comparable strategies in relevant RMPs and LMPs. However, interfering with the Solar PEIS process by further reducing the acreage available for development could hinder the growth of the solar industry. BLM must ensure that conservation measures do not limit the effectiveness of its goals regarding SEZs and variance areas emerging from BLM's Solar PEIS. SEIA appreciates BLM's commitment and hard work in protecting the biodiversity of public lands, but asks that BLM clarify how it will balance its conservation efforts with utility-scale solar energy development.	All	Both	emc0110GB
15.	Secretarial Order 3285 Amendment I Renewable Energy Development by the Department of Interior (February 22, 2010) and the Energy Policy Act of 2005 encourages the development of renewable and alternative energy resources, as part of an overall strategy to develop a diverse portfolio of domestic energy supplies. Furthermore, S03285AI states that "encouraging the production, development, and delivery of renewable energy is one of the Department's highest priorities." NV Energy requests that potential impacts to the development of renewable energy projects and associated transmission be analyzed in the proposed EIS.	All	Both	emc0198GB
16.	The development of renewable energy facilities and utility infrastructure has been a priority for Congress and the current administration and is currently a top priority in the DOI strategic plan. Preliminary recommendations by the National Technical Team on greater sage-grouse habitat designation indicate significant overlap of greater sage-grouse habitat with potential renewable energy development areas. 9 In addition, the designation of vast areas of critical habitat currently proposed by some agencies may significantly impair the development of linear infrastructure projects. If these effects are not considered, the improper implementation of conservation efforts may have the effect of precluding renewable development and hampering the ability of the agencies to meet their renewable energy goals	All	Both	emc0399GB
17.	PCW recommends a balanced conservation policy that provides for prudent and responsible development of renewable energy and transmission infrastructure. BLM and USFS should insure that any plan amendments and conservation measures implemented are also compatible with agency goals and mandates and that adequate consideration is given to competing interests and resources.	All	Both	emc0399GB
18.	In the absence of knowledge, agencies often resort to the "precautionary principal" which states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is harmful, the burden of proof that it is not harmful falls on those taking action. Under the precautionary principal, BLM and the USFS may be tempted to prohibit certain forms of development on public lands and National Forest System lands in order to protect greater sage-grouse in the absence of scientific proof of lack of harm; however, not taking action may cause greater harm to the species then allowing responsible renewable energy development to proceed	All	Both	emc0399GB
19.	Exclusion and Avoidance Areas. The NTT Report recommends that Priority Habitat Areas be classified as "exclusion areas" for new ROW permits except within designated ROW corridors and that general greater sage-grouse habitat areas be classified as "avoidance areas". These recommendations simply go too far, ignore BLM's multiple use mandate, and have no scientific basis. Priority Habitat Areas should not be managed as wilderness areas, which is the practical effect of classifying priority habitat as an exclusion area. Given the vast extent of greater sagegrouse habitat in the western United States it is	All	Both	emc0399GB

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	simply not feasible to avoid siting multi-state transmission lines and other long linear facilities within the Rocky Mountain or Great Basin regions without encroaching upon greater sage-grouse priority and general habitat areas.			
20.	Additionally, use of sagebrush habitat management by BLM is necessary to meet renewable and conventional energy development standards mandated by the Energy Policy Act of 2005. By making Priority Habitat Areas exclusion areas, BLM will be in violation of this and other federal mandates. The BLM must not adopt the recommendations of its Sage-Grouse National Technical Team to classify these areas as exclusion and avoidance areas.	All	Both	emc0399GB
21.	The BLM has a trust responsibility to treaty tribes which includes protection of culturally important species such as sage grouse and sharptail grouse. The BLM can do this by not allowing any wind turbines to be built within five miles of any sage grouse and sharptail leks.	All	Both	emc0009RM
22.	The importance of addressing new threats such as transmission lines and wind development.	All	Both	emc0212GB
23.	Sage grouse conservation measures, if too onerous, may also threaten renewable energy generation such as solar and wind power and the new transmission lines (such as the Energy Gateway South and Trans West Express projects) needed to convey such power to market.	All	Both	emc0242GB
24.	I believe that there are several factors involved in the decrease of their population. Industry such as oil and gas drilling and wind generators that are located in their habitat areas have a great influence on the nesting and strutting leks.	All	Both	cfc0014RM
25.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Closed to renewable energy development;	All	Both	emc0234GB
26.	BLM should put the following management prescriptions in place for L WCs at a minimum: Closed to renewable energy development.	All	Both	emc0234GB
27.	BLM and the Forest Service should incorporate zones and/or provide detailed guidelines for locating wind energy development that will protect sage-grouse habitat in affected RMPs and land use plans.	All	Both	emc0234GB
28.	Substantial amounts of sage-grouse habitat have high potential for wind energy development. We support wind development in suitable areas, with proper planning for protection of sensitive resources. Without proper planning, sage-grouse can be threatened and wind energy development can be delayed while agency resources are spent on projects that will not be successful. The recently-delayed proposed China Mountain Wind Energy project is an instructive example of a project that was proposed in important sage-grouse habitat, would clearly have unacceptable impacts on sage-grouse, and yet required many years of analysis by BLM before it was delayed to take into account this EIS process. Identifying areas that are best suited to wind energy development, in addition to those that should be protected from energy development to protect sage-grouse, will serve two important goals: (l) protecting the greater sage-grouse and (2) supporting wind energy development.	All	Both	emc0234GB
29.	Recommendations: The BLM can use this land use planning process for incorporating sagegrouse conservation measures and its many other ongoing opportunities to identify areas that are most appropriate for wind energy development, including by protecting sage-grouse habitat, and can also incorporate detailed guidelines for designating zones	All	Both	emc0234GB
30.	The Forest Service should also use this opportunity to incorporate identification of areas most appropriate for wind energy development and/or providing detailed guidelines for doing so	All	USFS	emc0234GB

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31.	Furthermore future mapping efforts for sage grouse habitat should consider how remote renewable resources might connect as this information is available now and can be used to mitigate the risk of overlapping conservation plans and transmission projects. Prioritizing sage grouse conservation areas that avoid transmission lines will further regional and national efforts to deploy renewable energy at the pace and scale that we need, while planning to protect sage brush species in a pro-active way that avoids known and planned for potential new infrastructure. Because transmission planning is conducted multiple years in advance of a project breaking ground, the BLM has the opportunity to ensure that sage grouse conservation, and transmission that is necessary to facilitate renewable generation, can exist within the same landscape.	All	Both	emc0234GB
32.	Similarity, the agencies should take into consideration how planned infrastucture to link renewable resources will impact sage grouse habitat.	All	Both	emc0234GB
33.	In addition to oil and gas development, wind potential in the Eastern Region is very high. We believe development of wind energy can be compatible with wildlife if wind development occurs outside of sensitive areas. Because greater sage-grouse avoid tall structures, special care should be taken to develop wind energy outside of identified core areas and all structures should be placed at least five miles from the nearest lek if the population is non-migratory and up to 12.5 miles if the population is migratory (USFWS 2004).	All	Both	emc0034
34.	In the Steens Mountain area, we are particularly concerned about industrial wind farm development and poor livestock grazing practices and the threats they pose to sage-grouse in the area.	All	Both	emc0263GB
35.	Have you checked with the people, (not govt officials) in the Ft Bridger, WY area. Their grouse populations have increased in the wind farm areas. Makes you wonder why! Increased predator control, higher reseeded area???	All	Both	emc0267GB
36.	Sometimes it appears there is a double standard when you consider how many birds are killed each day, even endangered species, by wind tubines then stop all drilling because sage grouse habitat is near by.	All	Both	emc0081RM
37.	The RMP amendments also should address significant new threats to sage-grouse: electrical transmission lines and wind power developments.	All	BLM	emc0298GB
38.	Wind energy development. Issue: Wind turbines and associated infrastructure can negatively affect sage-grouse.	All	Both	emc0391GB
39.	Significant areas of sage-grouse habitat have high potential for wind energy development, and wind energy development is increasing in sage-grouse range. FWS recognizes the potential negative effects of wind energy development on sage-grouse (75 Fed. Reg. 13949-13952) and has indicated that lek buffer recommendations for other types of development may be appropriate for wind energy projects (USFWS, undated (a)). Buffer recommendations generally range from "3-5 miles and beyond" (USFWS, undated (b); Manville 2004; USFWS 2003). The NTT report identified "wind turbines" as a discreet disturbance in sage-grouse habitat, but did not make specific recommendations for wind energy development (SGNTT 2011). FWS has stated that wind energy development should be prohibited sage-grouse core areas designated in Wyoming unless and until it can shown to have no impact on the species (Kelly 2009, letter). This suggests that wind energy development should be prohibited in priority habitat in other states. We support wind development in suitable areas and in accordance with the prescriptions in the recovery alternative, but it should not proceed in the absence of proper planning to protect sagegrouse and other resources. Landscape-level planning that designates zones for wind energy development would	All	Both	emc0391GB

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	save the agency from committing time and resources to analyze inappropriate wind energy projects. The proposed China Mountain Wind Energy Project, now delayed,14 is an example of a project proposed in important sage-grouse habitat that would clearly have unacceptable impacts on sage-grouse, and yet required many years of analysis by BLM before it was suspended to account for the sage-grouse planning process. The BLM has data on the quality of wind resources (compiled during the preparation of the Wind PEIS), potential conflicts from wind energy development with other resources and values, and the availability of transmission (in addition to current transmission-specific planning efforts), which the agency can use to designate wind energy zones for leasing. Further, the BLM's 2012 budget justification proposed a $3,000,000 increase for the Renewable Energy Management program to conduct studies and prepare regional planning studies and environmental reviews of potential wind energy zones in Nevada and Oregon. These studies will be completed in addition to those being supported with base funds in New Mexico, California, and Wyoming.15 The BLM's budget proposal iterates the agency's intent to plan for wind energy development zones and to update the Wind Programmatic EIS completed in 2005, while also taking into account planned transmission. The agency should use the sage-grouse planning process to inform planning for renewable energy development in sagebrush steppe. Similarly, the Forest Service should use this opportunity to identify areas most appropriate for wind energy development and/or develop guidelines for doing so.			
40.	We encourage BLM and FS to fully consider the risks caused by renewable energy development to sage-grouse and the sagebrush steppe ecosystem and to err on the side of caution in the development of new management standards and conservation measures.	All	Both	emc0339GB
41.	While there is no published research that specifically addresses the effects of wind development on greater sage-grouse, there is very strong evidence obtained from similar forms of disturbance, most notably fossil fuel extraction. Wind development typically requires many of the same features as oil and gas development. Because of this, FWS, in their 12-month finding on the petition to list greater sage-grouse, stated that "we anticipate that potential impacts from direct habitat losses, habitat fragmentation through roads and powerlines, noise, and increased human presence will generally be similar to those already discussed for nonrenewable energy development." The Service explicitly addresses side-effects of wind development in their 12-month finding, "As with oil and gas development, the average footprint of a turbine unit is relatively small from a landscape perspective, but the effects of large-scale developments have the potential to reduce the size of sagebrush habitats directly, degrade habitats with invasive species, provide pathways for synanthropic predators (i.e., predators that live near and benefit from an association with humans), and cumulatively contribute to habitat fragmentation."	All	Both	emc0339GB
42.	An inevitable consequence of any large, ground-disturbing project is the increased risk of colonization by invasive, non-native species. In the sagebrush-steppe community, in addition to the slow regeneration of sagebrush, the biggest threat is the invasion of cheatgrass. Cheatgrass has the potential to completely alter the ecosystem it invades, increase fire frequency, and prevent the establishment of sagebrush and native grass and forb understory. When cheatgrass becomes a dominant presence on the landscape it can change the fire regime over a very broad area, causing hotter and more frequent fires that destroy nearby sagebrush plants that were not impacted by the original construction project. Even assuming revegetation was successful, there is an increased risk of predation on nests by newly accommodated synanthropic predators. Raven, coyotes and other opportunistic predators will benefit from an open corridor, putting sage-grouse at further risk. The	All	Both	emc0339GB

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	introduction of aggressive fauna and flora invasive species are often linked to human disturbances, such as new roads and construction of facilities associated with any proposed wind project in sagegrouse habitat.			
43.	Maintaining greater sage-grouse population numbers and connectivity throughout the planning area will play a key role in preserving the species. The science is clear: the best scenario for improved sage-grouse abundance and distribution is to conserve habitats with existing populations and then work outward from those core areas to improve habitats in more peripheral areas. Biologically important sage-grouse habitat throughout the range should be managed conservatively, including in areas of high renewable energy potential.	All	Both	emc0339GB
44.	Lastly, we encourage the BLM and FS to incorporate elements of the final Fish and Wildlife Service Wind Energy Guidelines into their decision making including: the use of best available science, early public engagement and post-construction wildlife monitoring and a comprehensive strategy for effective mitigation.	All	Both	emc0339GB
45.	The proposed amendment to the Land Use Plans must adhere to Federal and State Executive Orders, Statutes, and Policies that mandate that the BLM accelerate and encourage renewable energy development. The Energy Policy Act of 2005 ("EPAct 2005") and other Executive Orders and Policies provide mandates and direction to BLM to promote alternative energy development. The Council on Environmental Quality (CEQ) regulations require the BLM to "prepare draft environmental statements concurrently and integrated with environmental impact analysis and related surveys and studies...and other environmental laws and executive orders." CEQ Regulations §1505.25. Congress provided a mandate to the Secretary of the Interior in the EPAct 2005 to "seek to have approved non-hydropower renewable energy projects located on the public lands with a generation capacity of at least 10,000 megawatts of electricity" in the next ten years. Energy Policy Act of 2005 §211. Another Executive Order signed by President George W. Bush directs agencies to [T]ake appropriate actions, to the extent consistent with applicable law, to expedite projects that will increase the production, transmission, or conservation of energy...For energy-related projects, agencies shall expedite their review of permits or take other actions as necessary to accelerate the completion of such projects... Executive Order 13212 at Sections 1 & 2 (emphasis added).	All	Both	emc0254GB
46.	B. Renewable Energy Development The boom of renewable energy sources, including wind, geothermal, and biomass, threatens to degrade or convert sage-grouse habitat throughout the West. The conversion of land to support these developments can destroy sage-grouse habitat. Additionally, noise and human presence during construction, road construction and use, and water quantity changes all have the potential to displace or seriously stress present sage-grouse in the area. And along with energy development often comes transmission corridors and associated roads, which can seriously fragment sagebrush landscapes. For these reasons, the Fish and Wildlife Service has stated that "the effects of both conventional and nonconventional renewable sources may claim a substantial toll on sage-grouse habitats and geographic areas that were in the past considered refugia for	All	Both	emc0276GB

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	the species." 75 Fed. Reg. at 13952.			
47.	Geothermal energy production is similar to oil and gas development in terms of impacts. It requires surface exploration, exploratory drilling, field development, and plant construction and operation, and direct habitat loss can occur from well pads, structures, roads, pipelines, and transmission lines. Human presence during construction, development and operation of geothermal processes may cause additional impacts to sage-grouse. Currently there are no enforceable regulations to protect sage-grouse during geothermal activities. Rather, the Bureau of Land Management implements best management practices to minimize impacts to sage-grouse, but these guidelines are unenforceable and very general in nature.	All	Both	emc0276GB
48.	Similar to geothermal energy, there are currently no regulatory mechanisms for wind development, although mechanisms are being developed for core sage-grouse areas in Wyoming. Controversy regarding wind energy grew when FWS wrote the Wyoming Game and Fish Department advising that using core population areas for research on the impact of wind energy would be inconsistent with protecting those areas for sage-grouse because the impacts on the species were unknown. Studies predict that wind energy will advance in Wyoming and Montana considerably over the next 20 years, and wind energy has been increasing noticeably in Idaho.	All	Both	emc0276GB
49.	Biomass energy development may also create impacts for sage-grouse. Direct conversion of sage-grouse habitat for growing biomass fuels creates a threat, as well as use of limited water resources that sage-grouse may rely upon.	All	Both	emc0276GB
50.	Wind power is definitely a negative effect of sage grouse, raptors, wildlife , destruction of land surrounding pads, road construction, water consumption and impact of recreation. Decommissioning and restoring after decommissioning, upgrading transmission lines and collector lines and oversight relate to nothing short of frivolous spending.	All	Both	rmc0001RM
51.	Recognizing the threats imposed by climate change, NWF has called for a rapid transition to energy sources other than fossil fuels that contribute to greenhouse gas emissions. The generation of electricity via solar and wind energy, including utility-scale facilities, is an important component of that transition. At the same time, NWF recognizes that while wind power may be carbon pollution free, it is not impact free. It leaves an industrial footprint on the land and some wildlife habitats will be forever altered by their presence. More than 30% of greater sage-grouse habitat has high potential for wind power. Utility-scale wind energy development can have damaging effects on sage-grouse and their habitat. As such, wind energy development in sage-grouse habitat has the potential to cause significant impacts on greater sagegrouse. The BLM plays a critical role in ensuring that the boom in wind energy development does not lead to declines in the greater sage-grouse population. The BLM has sufficient data on the quality of wind resources, potential conflicts with other resources and values, and availability of transmission, which the agency can use to designate wind energy zones, similar to SEZs. Through amendments to affected land use plans, BLM can incorporate not only wind energy zones, but also areas that are off limits to wind energy development (as specific industrial-level energy ROW avoidance and exclusion areas).	All	Both	emc0329GB
52.	BLM needs to resolve internal policy initiative conflicts within the Department of the Interior (DOI), as they apply to renewable energy development and wild horse management. These land uses are DOI priorities even though they have the same or greater adverse impacts to sage grouse habitat as do other land uses that BLM now proposes to end or restrict;	All	BLM	emc0371GB

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53.	A. Push for Renewable Energy Conflicts With Sage Grouse Habitat Protection Only two months ago, the Interior Secretary did a series of personal briefings to push for rapid approval of regional transmission lines to carry wind energy and for wind farms. At the same time, the Interior Secretary and the Department of Energy continue to promote solar and wind energy which are being built on public lands. The adverse impacts from renewal energy development are the same or similar to those from oil and gas, mineral or coal development. Nevertheless, the two departments continue to push and subsidize renewable energy projects, while proposing to shut down oil and gas, coal and other mining to protect sage grouse habitat. Bird mortality due to wind farms remains largely unquantified but is high.1 CLG is also cooperating on the transmission line EIS' where BLM's rapid approval process gives these lines significant latitude not made available to other projects. The EIS documents that the mitigation measures for sage grouse are sufficient, when the same or similar measures are insufficient for oil and gas, coal or mining.	All	Both	emc0371GB
54.	Secretarial Order 3285 Amendment 1 Renewable Energy Development by the Department of Interior (February 22, 2010) and the Energy Policy Act of 2005 encourages the development of renewable and alternative energy resources, as part of an overall strategy to develop a diverse portfolio of domestic energy supplies. Furthermore, S03285A1 states that "encouraging the production, development, and delivery of renewable energy is one of the Department's highest priorities." NV Energy requests that potential impacts to the development of renewable energy projects and associated transmission be analyzed in the proposed EIS.	All	Both	rmc0049GB
55.	• Wind development is not necessarily analogous to other development activities and, therefore, studies from those other activities should not be used to impose conservation measures on the wind industry.	All	Both	emc0344GB
56.	• The scale of the core area protection approach and its blanket exclusion of wind development compromises state and Federal renewable energy and economic development objectives.	All	Both	emc0344GB
57.	C. Renewable Energy Development on Federal Public Lands is an Appropriate and Accepted Land Use under the Multiple-Use Mandates Renewable energy is unquestionably among the diverse multiple uses that Congress intended for the public lands. Not only are renewable energy sources, like wind, a "renewable resource" as mentioned directly in the definition of "multiple use" under FLPMA and NFMA,37 but they are also an appropriate use of public lands explicitly envisioned by Congress. In the Energy Policy Act of 2005, Congress called for approval of nonhydropower renewable energy projects located on the public lands with a generation capacity of at least 10,000 megawatts of electricity within ten years of the enactment of the Act.38 Furthermore, on May 18, 2001, President Bush issued Executive Order (E.O.) 13212, "Actions to Expedite Energy-Related Projects," establishing the policy that federal agencies should take appropriate actions, consistent with applicable law, to expedite projects to increase the production, transmission, or conservation of energy.	All	Both	emc0344GB
58.	D. Wind Development is Not Necessarily Analogous to Other Development Activities All development that may impact sage grouse is distinct and includes differing densities of roads, structures, and traffic,	All	Both	emc0344GB

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	lighting, structures of varying heights etc. It is not reasonable to just extrapolate impacts from one kind of development onto a totally different kind of development or to just assume that conservation measures applicable to one type of development are necessary for another kind of development. The typical wind project is several orders of magnitude smaller than many other types of development activities where greater sage-grouse have been previously studied. The "typical" wind farm is about 100-200 MW and the land needed by wind farm infrastructure is about one acre per MW. Studies of some wind energy facilities indicate prairie grouse continue to use areas in close proximity to wind turbines. These include studies of greater prairie chickens in Kansas and Minnesota and studies of greater prairie chickens and sharp-tailed grouse in Nebraska.186 Most of these studies have only covered a relatively short time period and may not document lag effects noted for sage-grouse responses to other development activities.187 Thus, to definitively answer whether studies for development activities hold true for wind energy development will require actual long-term data from multiple existing wind energy facilities in the sage-grouse range. Until this is done, BLM appears willing to continue to rely on surrogate development activities (other than wind) to support the basis for imposing restrictions on wind energy development, even though there is no evidence to support drawing such an analogy and, in turn, imposing similar restrictions for such distinct development activities.			
59.	F. The Scale of the Core Area Protection Approach and its Blanket Exclusion of Wind Development Compromises State and Federal Renewable Energy and Economic Development Objectives The sage-grouse conservation documents that the NOI states will inform the RMP amendment process adopt an approach whereby important environments for sage-grouse preservation are identified and subsequently established as core areas in which development activities are prohibited. For example, there is a blanket prohibition on wind energy development in PPH areas in which a 3 percent disturbance threshold has already been met.196 Another related core area protection measure requires that PPH areas be managed or restored so that at least 70 percent of the land cover provides sagebrush habitat for the sage-grouse.197 Given that the sage-grouse occupies an expansive range across the western United States, much of which overlaps with the nation's regions that possess the greatest potential for wind energy development, such a rigid conservation framework has the potential to bring wind energy development on public lands to a halt. AWEA has analyzed the PPH and PGH sage-grouse areas designated within different states and how they overlap witheach state's capacity for wind development. According to our analysis, restricting development in the designated areas would result in the loss of 82.2 percent of all lands suitable for wind development in Wyoming, 55 percent for Nevada, 53 percent for Montana, 52.1 percent for Idaho, 38.4 percent for Oregon, and 9 percent for Utah.198 Considering the magnitude of these percentages, adopting a core area approach premised on blanket wind development exclusions would significantly derail the nation's energy, environmental, and job creation objectives associated with renewable energy, and prioritized by the Obama Administration.	All	BLM	emc0344GB
60.	H. Conservation Measure Alternatives to the Core Area Exclusion Approach	All	BLM	emc0344GB

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	AWEA believes that preservation of the sage-grouse can best be achieved by enlisting the wind industry as a partner in conservation and that wind developments can be designed and operated to coexist with sagegrouse habitats. Site-specific habitat analyses can be completed pre- and post-construction research to assess the potential impact of wind energy projects on sage-grouse to determine how they these projects can best be sited and maintained to mitigate any potential impacts on sage-grouse habitats. Compensatory mitigation measures can also be pursued to provide a net benefit to the species, such as establishing conservation banks that benefit specific populations in various regions that are most in need. Another approach to preserving the sage-grouse is augmenting small existing populations in isolated areas by translocating sage-grouse from other areas and combining the relocations with habitat enhancement activities. These strategies would help to prevent extirpation at the edges of the range and enhance the genetic diversity in these small populations as well.199 Significant scientific uncertainty surrounds the threats posed to sage-grouse and the value of different conservation tactics. Therefore, the sponsorship of applied research to determine what measures are effective in enhancing existing sagebrush habitat could provide significant contributions to the species. Examples of other potential mitigation and/or conservation measures that we believe would have the greatest positive impact on sage-grouse populations are as follows: 1. Funding a database that would compile all known data on sage-grouse populations, mortality, trends, etc. on a regional and national basis. 2. Funding programs focused on habitat improvements and preservation. AWEA and the wind industry remain available to discuss these and other options that could provide a net positive benefit to sage-grouse populations.			
61.	These measures are minimal, and ineffective. We note that BLM did not even bother to include BMPs for industrial wind, solar development, or transmission in the NTT, and its previous 2010 IM and other policies for these are completely inadequate. However, we use examples from some recent renewable energy project proposals to illustrate the inadequacies of these BMPs for all kinds of development in sagebrush habitats. Industrial renewable energy projects sited on public land often have colossal impacts and a huge disturbance Footprint similar to oil and gas and industrial geothermal development. The guidance is limited, loose and uncertain. It cannot be considered effective. Example: Design roads to an "appropriate" standard no higher than necessary to accommodate their intended purpose. This means a freeway could be built "to appropriate standards" if the developer said they needed a freeway. Do not issue rights-of-way..unless.. BLM uses words like "unless" - always giving itself and pliant managers facing political pressures to approve projects the ability to do so. Exceptions should not be granted. The word "shall" must be used. Under "operations", BLM would "cluster disturbances". Yet the core and priority schemes allow large-scale linear disturbances 3%-5% of additional habitat with an immense footprint to slice through "priority" habitats, and uncontrolled	All	BLM	emc0411GB

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	sacrifice of general habitats.			
62.	A moratorium should immediately be placed on all wind energy development projects, rights-of-way, and MET towers on public lands. Across the range of sage-grouse and the western landscape, very little is known about migration patterns for migratory songbirds and other migrants, including bats and migrating insects like dragon flies. Many areas with the higher wind potential are often ridges or plateau rims, and are also the relatively undeveloped remaining sagebrush wild lands - as these areas typically have shallower soils, or abundant rocks in some areas, or steep drop-offs, rimrocks or cliffs. So these windy areas were not targeted by agencies for livestock sagebrush eradication projects, crested wheatgrass seedings, intensive pasture fencing and pipeline schemes that typically accompanied livestock forage schemes on productive sites. Thus, they are less developed for livestock, and are often better condition remnant habitats that serve as refugia for sage-grouse. Moreover, sage-grouse impacts are but one part of the large-scale adverse impacts of industrial wind facilities. Lethal golden eagle impacts, and impacts to migrating species, are often just not understood in sufficient detail to enable agencies to merely push siting onto non-priority or non-sage-grouse habitats.	All	Both	emc0411GB
63.	Much more detailed studies of bird and other volant species migration and habitat use patterns must be conducted before any areas can be proposed for wind development on public lands. Across the western landscape, very few studies have been done. Those that have conducted are often overseen by wind developers or in response to threats of development – and may include only spotty observations over a single season. Necessary night-time radar studies over all migration periods and thorough ground-based observation studies have often not been conducted. Storms during migration periods - and especially spring storms – can down migratory birds and alter areas of highest migrant presence. These effects are seldom if ever addressed. The studies we have seen repeatedly point to the most exceptional known high-use areas, such as the Goshute range in the context of raptor migration, as a benchmark for significance of avian use. The studies then try to minimize importance of all other areas by claiming that, for example, ridges in the Great Basin don't have as much raptor use as the Goshute Range. Thus, they are deemed to be of much lesser importance. With Spring Valley Wind, BLM (and NDOW capitulated) knowingly impacted 9% of the North Spring Valley PMU, and further severed habitat connectivity between PMUs. Placing a moratorium on industrial wind development and associated infrastructure on public lands in the sagebrush biome would ensure that adequate knowledge could be gained so that: - Sage-grouse habitats will be effectively protected and conserved. - Conservation actions aimed for sage-grouse do not shift wind development into, and harm, wildlife in other areas – and cause significant harm and mortality to other species whose migration pathways are not known – such as migrating warblers, western tanagers, rare bats like the Townsend's big-eared bat, or into areas where high golden eagle mortality is likely.	All	Both	emc0411GB
64.	Plus industrial wind farms have a large adverse Footprint on people who may live near where they might be sited, or shifted to, as well. A moratorium is important until the full adverse impacts of wind development on public lands can be better understood. The Forest and at times BLM policy of issuing CEs to paper over placement of MET towers must be immediately ended (if agencies fail to adopt a moratorium)	All	Both	emc0411GB

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
65.	Sage grouse standards for wind and transmission lines. Wind power generation represents a clean, renewable alternative to fossil fuels, but construction of wind farms in key habitats is likely to lead to unacceptable levels of impact. Although there is little published science directly addressing the impact of wind turbines or transmission lines on sage grouse, there is a broad consensus among biologists that sage grouse avoid tall structures (such as wind turbines and transmission towers) and abandon adjacent habitats. One unpublished study found that sage grouse habitat use increased with distance (up to 600 meters) from transmission lines. It is notable that modern perch inhibitors emplaced on transmission lines result in a major decrease, but not elimination, of raptor perching (Slater and Smith 2010). Molvar (2008) compiled BLM data from a wind power project on Cotterel Mountain, Idaho and was able to determine that the erection of seven meteorological towers led to drastic declines in sage grouse populations across nine sage grouse leks, while populations in the surrounding area remained stable. See Attachment 5. There has been abundant scientific information that other types of energy development, particularly oil and gas, has a major impact on sage grouse populations, and oil and gas development has some similar features such as habitat fragmentation and tall structures (in the form of drilling rigs).	All	Both	emc0343GB
66.	The USFWS (no date) conducted a literature review through 2010 and found that recommended buffer distances for sage grouse were generally 3.1 to 4 miles and beyond. We endorse the recommendations of USFWS (2003) and Mannville (2004) that wind power facilities be sited at least five miles from active sage grouse leks, regardless of whether or not they occur within Priority Habitats. Similarly, lands identified as sage grouse winter habitat should similarly be avoided by a distance of not less than three miles.	All	Both	emc0343GB
67.	Wind and Transmission Inside Core Areas • No wind energy development • Transmission lines should be buried underground or limited to existing electrical transmission corridors of … mile maximum width. Outside Core Areas • Wind farms and transmission lines sited at least 5 miles from active sage grouse leks and at least 3 miles from identified winter habitats. • Transmission lines allowed along existing electrical transmission corridors of … mile maximum width.	All	Both	emc0343GB
68.	At minimum, the NEPA analysis should address the following: • Excluding core areas and all other lands within 5 miles of an active sage grouse lek from wind turbine permitting.	All	Both	emc0343GB
69.	Even renewable energy development, which needs to be developed to reduce the harmful effects of climate change, poses a great threat to sage-grouse.	All	BLM	fld0000rm, fld0000gb
70.	Don't allow new wind or solar facilities in priority sage-grouse habitat. (There are plenty of other good places for renewable energy.)	All	Both	flf0000gb flf0000rm

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
71.	I urge you to consider coordinated plan amendments that will : limit new power lines, wind turbines and other tall structures in or near sage grouse priority habitat	All	Both	flg0000gb flg0000rm
72.	There are radars that will shut down turbines, there are systems that are not turbines. Please, let's get head together because this is killing our wildlife across the nation at an alarming rate. Let's look to European solutions as a guideline. They have learned what we apparently cannot.	All	Both	fla0106gb
73.	In my area the PSE Wild Horse Wind Farm near Ellensburg WA is an example of an energy facility built with restoring Sage Brush Steppe in mind. I suggest you look at that facilities habitat restoration activities.	All	Both	fla0012gb
74.	No new leasing of non-renewable energy resources within priority sage-grouse habitat.	All	Both	flb0000gb and rm
75.	The lack of energy development in Middle Park has been beneficial to sustaining our current sage-grouse population levels. To sustain the Middle Park population the working group supports the NTT report recommendation of no leasing within PPH areas for the Middle Park population. The Middle Park population is the third largest in the state of Colorado after Northwest and North Park populations. These 3 populations account for 93% of the males counted. Of the three largest populations Middle Park is the only population that does not currently have any energy development activity. There are limited leases in Middle Park but at this point most of the lease sales have been deferred until the completion of the BLM Kremmling Field Office Resource Management Plan. The MPSGWG strongly encourages protection of the Middle Park population from future lease sales to assure that the Middle Park population is not further threatened by energy development. The EIS should include an analysis of the NTT recommendations in reference to Mineral Development as stated on pg 21 last paragraph of the NTT report and use the most current research to guide BLM in their planning. The CCP GrSG Disturbance Guidelines are attached in Appendix II as a reference for BLM to utilize while addressing the issues identified in this letter.	CO	Both	emc0063RM
76.	2. Limit wind and solar energy development. The NTT is silent on both wind and solar energy development. The Routt Plan amendment should include a prohibition on wind and solar energy structures in priority habitat and a sufficient area around such developments to buffer the effects. Given the height of the turbines used in wind energy and the noise associated with them, the buffer may have to be large.	CO	USFS	emc0175RM
77.	WWF, in partnership with The Nature Conservancy, recently developed maps of wind energy potential on already disturbed lands in the five states encompassed by the Northern Great Plains Ecoregion (Montana, Wyoming, North Dakota, South Dakota, Nebraska; Fargione et al. 2012). Wind potential on disturbed lands alone far exceeds the Department of Energy's goals in each of these states. Thus, we advocate for wind energy development on already disturbed lands that lie outside greater sage-grouse core areas.	East	Both	emc0034RM
78.	iii. Strong components of Wyoming's approach Wyoming contains some of the highest categories of wind potential (Exhibit 1). However, inappropriately siting and design of wind farms can have adverse impacts on wildlife and erode public support at a time when clean renewable power is urgently needed. The Wyoming EO 2011-05 rightly states that wind development is not recommended in sage-grouse core areas. Wind development and other land uses for which research on the impacts to sage-grouse are lacking are prohibited unless it can be demonstrated that they will not cause sage-grouse population declines. EO 2011-5 provides for reevaluation, on a	East	Both	emc0089RM

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	continuous basis, as new science, information and data become available. In response to an inquiry letter from WGFD, former USFWS field supervisor Brian Kelly stated in July 2009, that "constructing wind farms in core areas, even for research purposes, prior to demonstrating it can be done with no impact to sage-grouse, negates the usefulness of the core area concept as a conservation strategy and brings into question whether adequate regulatory mechanisms are in place to protect the species." USFWS explained that a mitigation plan for wind power development in core areas does not exist.			
79.	14. Blm should designate and/or provide guidelines for wind energy development zones that will protect sage-grouse habitat On December 29, 2011, the BLM issued an Advance Notice of Proposed Rulemaking Regarding a Competitive Process for Leasing Public Lands for Solar and Wind Energy Development 76 Fed. Reg. 81906. The notice describes one of the main goals as "establish[ing] competitive bidding procedures for lands within designated solar and wind energy development leasing areas." Notably, while BLM is in the process of designating solar energy zones in a Solar Energy Development Programmatic EIS (PEIS), the BLM has not designated or undertaken a process to designate specific leasing areas for wind energy development. While the BLM completed a PEIS for wind energy development in 2005, the PEIS only generally identified lands available for wind energy rights-of-way. Much additional research on the impacts of wind energy on wildlife has occurred since that time. The solar energy zones that the BLM will designate in the Solar PEIS are those places that the agency believes best suited to utility scale development, based on quality of solar resources, low conflict with other values, and proximity to transmission. Similarly, the BLM now has data on the quality of wind resources (compiled during the preparation of the Wind PEIS), potential conflicts with other resources and values, and the availability of transmission (also evaluated during the Solar PEIS, as well as transmission-specific planning efforts), which the agency can use to make similar designations of wind energy zones for leasing. In addition to the benefits of facilitating renewable energy development in areas with high solar and wind resources and few conflicts with natural and cultural resources, designation of zones can also aid in planning for future transmission development by identifying areas to be prioritized for access when planning new lines. BLM's 2012 Budget Justification included a $3,000,000 increase for the Renewable Energy Management to conduct studies and prepare regional planning studies and environmental reviews of potential wind energy zones, specifically in Nevada and Oregon. This is in addition to wind studies underway in New Mexico, California, and Wyoming and will support an update to the Wind Programmatic EIS completed in 2005. We recognize, however, that while designating renewable energy zones can facilitate wind energy development nationwide, individual wind farms and wind turbines must be sited appropriately after careful consideration and evaluation of the potential site-specific impacts on wildlife and other resources.	East	Both	emc0089RM
80.	Recommendation: The BLM and FS should use range-wide planning as an opportunity to provide input on how zoning could help direct both wind turbines and transmission away from sage-grouse and other sensitive wildlife habitats, including designating zones and/or providing detailed guidelines for designation.	East	Both	emc0089RM
81.	Only two months ago, the Interior Secretary did a series of personal briefings to push for rapid approval of regional transmission lines to carry wind energy and for wind farms. At the same time, the Interior Secretary and the Department of Energy continue to promote solar and wind energy which are being built on public lands. The adverse impacts from renewal energy development are the same or similar to those from oil and gas, mineral or coal development. Nevertheless, the two departments continue to push and subsidize renewable energy projects, while proposing to shut down oil and gas, coal and	East	Both	emc0155rm

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	other mining to protect sage grouse habitat. Bird mortality due to wind farms remains largely unquantified but is high. VRLP is also cooperating on the transmission line EIS where BLM's rapid approval process gives these lines significant latitude not made available to other projects. The EIS documents that the mitigation measures for sage grouse are sufficient, when the same or similar measures are insufficient for oil and gas, coal or mining.			
82.	The Great Basin sagebrush ecosystems are experiencing a relatively new threat in the form of large-scale industrial wind energy projects. Part of Spring Valley in Nevada has recently been developed with large wind turbine generators very close to active leks. This is inappropriate for the recovery of the Greater sage grouse.	GB	Both	emc0404GB
83.	Wind projects fragment large areas of sagebrush with many miles of new roads, as well as providing new perches for raptor predators of the grouse. Wind projects need to be very carefully sited away from sage grouse habitats in the future.	GB	Both	emc0404GB
84.	The Western region will not likely experience high rates of natural gas or oil development in the short term due to limited resources; however all of the region will have increases in renewable energy development and the expansion of high-voltage electric transmission lines. Many planning efforts related to transmission and renewable energy siting are underway by BLM and other federal agencies. The BLM should ensure these plans and environmental review processes take into account recommendations from the NTT, and are compatible with sagegrouse conservation efforts. With increase of applications for renewable energy facilities within sage-grouse habitat, a greater emphasis must be placed on developing specific standards and guidelines for energy development in known or potential sage-grouse habitat. BLM should seek to steer development away from areas with important sage-grouse habitat, and establish an expectation that proposed development in high-conflict areas will face significant risks and challenges. While the research outlining the impacts of renewable energy facilities on sage-grouse populations is still in early stages, research detailing the impacts of oil and gas extraction is available. Although these developments may be different in the footprint they share, they do include disturbances such as roads, increased human activities, transmission corridors, and fences. The deficiency of published data on the impacts of renewable energy does not negate the potential for detrimental effects. Negative impacts of these developments can include: - Avoidance behavior, potentially dispersing adults from lek sites or winter ranges; - Increased mortality through collisions, stress, and nest abandonment; the Western region will not likely experience high rates of natural gas or oil development in the short term due to limited resources; however all of the region will have increases in renewable energy development and the expansion of high-voltage electric transmission lines. Many planning efforts related to transmission and renewable energy siting are underway by BLM and other federal agencies. The BLM should ensure these plans and environmental review processes take into account recommendations from the NTT, and are compatible with sagegrouse conservation efforts. With increase of applications for renewable energy facilities within sage-grouse habitat, a greater emphasis must be placed on developing specific standards and guidelines for energy development in known or potential sage-grouse habitat. BLM should seek to steer development away from areas with important sage-grouse habitat, and establish an expectation that proposed development in high-conflict areas will face significant risks and challenges. While the research outlining the impacts of renewable energy facilities on sage-grouse populations is still in early stages, research detailing the impacts of oil and gas extraction is available. Although these developments may be different in the footprint they share, they do include disturbances such as roads, increased human	GB	Both	emc0355GB

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	activities, transmission corridors, and fences. The deficiency of published data on the impacts of renewable energy does not negate the potential for detrimental effects. Negative impacts of these developments can include: - Avoidance behavior, potentially dispersing adults from lek sites or winter ranges; - Increased mortality through collisions, stress, and nest abandonment.			
85.	With specific regard renewable energy transmission and resource development, the proposed action must take into account the years of work done by: The Western Governors Association Regional Transmission Expansion Project, analysis of transmission requirements under a broad range of alternative energy futures and to develop long-term, interconnection-wide transmission expansion plans. More information may be found at http://www.westgov.org/rtep . These studies provide the basis for developing a balanced program of habitat management with energy development potential in terms of designated land use. All of these studies have been developed with a broad range of expertise and experience. State and federal agencies were contributing members along with utility, conservation and industry groups. All have extensive map products available for use and incorporation into the proposed action. All consider constraints of cultural, social, and biological issues among others. All have recommendations of primary renewable energy zones and necessary transmission corridors for delivery of energy. All of the studies are less than three years old and pertinent to the proposed action.	GB	Both	emc0254GB
86.	With specific regard renewable energy transmission and resource development, the proposed action must take into account the years of work done by: The Nevada Renewable Energy Transmission Access Advisory Committee (RETAAC), commissioned under executive order by Nevada State Governor Jim Gibbons, in support of Nevada's adoption of the Renewable Portfolio Standard, defined renewable energy zones, zones of constraint and transmission corridors. RETAAC's Phase II report, published on July 1, 2009, is ultimately the product of more than 25 General Committee and Workgroup meetings conducted by and with participation from a significant cross-section of agency and industry stakeholders, including RETAAC Phase II Committee Member Amy Lueders who concurrently served as Nevada BLM's Associate State Director and is currently State Director. Other notable participating agencies with representative RETAAC Committee Members include the Nevada Division of Environmental Protection, Nevada Division of Minerals, Office of the Governor - Nevada State Office of Energy, Public Utilities Commission of Nevada, and the Nevada Department of Wildlife. The full reports and maps can be downloaded at http://sites.google.com/site/retaac. These studies provide the basis for developing a balanced program of habitat management with energy development potential in terms of designated land use. All of these studies have been developed with a broad range of expertise and experience. State and federal agencies were contributing members along with utility, conservation and industry groups. All have extensive map products available for use and incorporation into the proposed action. All consider constraints of cultural, social, and biological issues among others.	NVCA	Both	emc0254GB

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	All have recommendations of primary renewable energy zones and necessary transmission corridors for delivery of energy. All of the studies are less than three years old and pertinent to the proposed action.			
87.	With specific regard renewable energy transmission and resource development, the proposed action must take into account the years of work done by: The California Renewable Energy Transmission Initiative (RETI) assessment all competitive renewable energy zones in California and in neighboring states that can provide significant electricity to California consumers by the year 2020. RETI also will identify those zones that can be developed in the most cost effective and environmentally benign manner and will prepare detailed transmission plans for those zones identified for development. More information can be found at http://www.energy.ca.gov/reti/index.html . These studies provide the basis for developing a balanced program of habitat management with energy development potential in terms of designated land use. All of these studies have been developed with a broad range of expertise and experience. State and federal agencies were contributing members along with utility, conservation and industry groups. All have extensive map products available for use and incorporation into the proposed action. All consider constraints of cultural, social, and biological issues among others. All have recommendations of primary renewable energy zones and necessary transmission corridors for delivery of energy. All of the studies are less than three years old and pertinent to the proposed action.	NVCA	Both	emc0254GB
88.	In the Renewable Energy Section of Appendix VI, the EIS cites a Northwest Economic Associates, 2003 study of wind farms economic impacts. More current information is available on the negative impacts from the northeast Oregon wind farms in Baker Co.	OR	Both	rmc0036GB
89.	For powerline transmissions, and wind energy projects it might be advantageous to have the lowest wire on the transmission line or tip of the wind turbine be above a specific distance from the ground in core area habitat. Sage Grouse do not fly very high but a minimum could be set.	WY	Both	emc0050RM
90.	iii. Strong components of Wyoming's approach Wyoming contains some of the highest categories of wind potential (Exhibit 1). However, inappropriately siting and design of wind farms can have adverse impacts on wildlife and erode public support at a time when clean renewable power is urgently needed. The Wyoming EO 2011-05 rightly states that wind development is not recommended in sage-grouse core areas. Wind development and other land uses for which research on the impacts to sage-grouse are lacking are prohibited unless it can be demonstrated that they will not cause sage-grouse population declines. EO 2011-5 provides for reevaluation, on a continuous basis, as new science, information and data become available. In response to an inquiry letter from WGFD, former USFWS field supervisor Brian Kelly stated in July 2009, that "constructing wind farms in core areas, even for research purposes, prior to demonstrating it can be done with no impact to sage-grouse, negates the usefulness of the core area concept as a conservation strategy and brings into question whether adequate regulatory mechanisms are in place to protect the species." USFWS explained that a mitigation plan for wind power development in core areas does not exist.	WY	Both	emc0089RM

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
91.	The boom of renewable energy sources such as wind and geothermal, threatens to degrade or convert sage-grouse habitat throughout the West. The conversion of land to support these developments can destroy sage-grouse habitat. The FWS writes, Renewable energy resources, such as windpower and geothermal energy, require many of the same features for construction and operation as do non- renewable energy resources. Therefore, we anticipate that potential impacts from direct habitat losses, habitat fragmentation through roads and powerlines, noise, and increased human presence (Connelly et al. 2004) will generally be the same as already discussed for nonrenewable energy development. Windpower may have additional mortalities resulting from sage-grouse flying into turbine rotors or meteorological towers (Erickson et al. 2001). Additionally, noise and human presence during construction, road construction and use, and water quantity changes all have the potential to displace or seriously stress present sage-grouse in the area. Transmission corridors and associated roads accompanying energy development can seriously fragment sagebrush landscapes. For these reasons, the FWS has stated that "the effects of both conventional and nonconventional renewable sources may claim a substantial toll on sage-grouse habitats and geographic areas that were in the past considered refugia for the species." (75 FR 13952.) Currently it is estimated that 21 percent of Wyoming core areas have high wind potential, and about 51 percent are subject to either wind development or are authorized for development of oil and gas leases. Studies predict that wind energy will advance in Wyoming and Montana considerably over the next 20 years. Fortunately, in Wyoming, "wind development is not recommended in sage-grouse core areas, but will be reevaluated on a continuous basis as new science, information and data emerges" (Wyoming Executive Order 2011-5, Wyoming Greater Sage-Grouse Core Area Protection). While this "not recommended' preference is commendable, the Wyoming Core Area strategy should take a precautionary approach and "exclude" wind development from core areas until thorough bodies of scientific literature indicate that wind energy development does not harm sage grouse conservation.	WY	Both	emc0167RM
92.	The State of Wyoming is pursuing a sound policy with regard to wind power development in sage grouse habitat, that of excluding wind power development from designated Core Areas (although for several wind projects, Core Area boundaries have been shifted to exclude lands desired by the wind industry). Excluding wind power development from core habitats makes sense; in Wyoming, more than four million acres commercially viable for wind energy development are outside of Core Areas and have no other identified environmental conflicts (Molvar 2008), which represents approximately four times the maximum acreage needed for the high benchmark for wind development through 2030 (estimated at 10,000 turbines by the wind power industry). There are some real emerging problems, however, with Core Area boundaries being altered to allow wind projects to be built in lands originally designated as Core. The Power Company of Wyoming's Chokecherry project is the most egregious example of these, and is a thousand-turbine project in recently undesignated Core habitat that is likely heading for litigation. Another example is a proposal by Whirlwind LLC for the South Pass Core Area; a carve-out was granted for this project, and although Whirlwind has thankfully relocated to another site in Carbon County, the carve-out remains.	WY	Both	emc0343GB

Table C-5.D
Comments Related to Renewable Energy Development

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
93.	In the GIS-based report, Wind Power in Wyoming: Doing it Smart from the Start (Attachment 5), BCA was able to identify almost 4 million acres in Wyoming with commercial wind potential and no environmental conflicts, and an additional 12.5 million acres with manageable environmental conflicts which are readily ameliorated through the use of Best Practices outlined in the report. Given that the maximum build-out of 10,000 turbines by 2030 could be accommodated on 1 million acres, there is no reason to allow wind development in important sage grouse habitat. We recommend that wind power facilities be sited no closer than 5 miles from any active sage grouse lek or within 3 miles of identified winter concentration areas.	WY	Both	emc0343GB

Table C-5.E
Comments Related to General Construction Impacts

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Detrimental projects must not be rammed through regardless of the consequences to sage grouse and other sagebrush-dependent species.	All	Both	rmc0039GB
2.	The Ranch has numerous pastures in its Jackpot allotment (an Elko Field Office managed allotment) that will be affected by the construction and operation of the proposed China Mountain Wind Project (the "Project"). The Project will result in approximately 70 miles of all-weather gravel roads and increase public access and traffic within the heart of prime sage grouse habitat, as well as within our fee ground and our grazing allotments. Construction schedules have varied for the Project, but the proposed schedules consistently show construction beginning no later than the summer of 2013. We question how the BLM can approve a plan of development for the Project before Records of Decision and approved RMP Amendments for sage-grouse are issued in 2014 for both the Nevada/ NE California and the Idaho/ SW Montana sub-regions.	All	Both	emc0037GB
3.	The other issue that is hurting habitat is the sprawl of home building and construction in critical habitat areas. Planning and zoning should be a part of the process of habitat preservation. I have been a part of seeing the wildlife biologists hands being tied by the Governors' advisory council which has to respond when issues are raised about wildlife conflict with proposed development and habitat. If input from wildlife concerns were submitted on proposed projects in a timely manner, the input could help shape planning on critical development.	All	Both	emc0405GB
4.	The distances set for no surface disturbance activities is probably excessive in all reality.	All	Both	cfc0018RM
5.	BLM should put the following management prescriptions in place for LWCs at a minimum: Closed to construction of new roads	All	Both	emc0234GB
6.	There is significant scientific evidence that the BLM should protect sage grouse habitat by establishing a 4-mile No Surface Occupancy zone around each and every sage grouse lek, For the reasons enumerated below, this would promote their conservation and minimize the need for listing sage grouse under the ESA.	All	BLM	emc0057RM
7.	Review of Literature from GSGCM Report. Upon reviewing the GSGCM report, we reviewed literature cited by the report as the basis for the conservation measures. The GSGCM report suggests that only a 3% disturbance of a section be allowed in very limited circumstances at any one time, and on page 21 regarding energy development, the GSGCM reports Conservation Measures present that the exclusion of mineral development and other disturbances from priority habitats is needed where possible and that agencies should limit them as much as possible in other areas (including private lands). The same section also states that a 4-mile NSO [no surface occupancy] likely would not be practical given most leases are not large enough to accommodate a buffer of this size, and lek spacing within priority habitats is such that lek-based buffers may overlap and preclude all development (emphasis added). It further states that 4-mile buffers around leks are needed to ensure the continued persistence of the greater sage-grouse. The 3% surface disturbance conservation measure equates to only 19.2 acres of disturbance in a 640-acre section, based on "professional judgment from Holloran 2005, Walker et al. 2007, Doherty et al. 2008, Doherty et al. 2011, and Naugle et al. 2011a, b"(see pg. 8 of GSGCM report). Further, the GSGCM report states that if there is already 3% surface disturbance within sage-grouse habitat, then no other uses should be allowed. The GSGCM report also indicates that if there is already more than 3% surface disturbance in sagegrouse habitats, then significant reclamation activities and mitigations should take place. However, upon reviewing the scientific	All	Both	emc0058RM

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	literature cited by the GSGCM report, we do not see where these articles support a maximum limitation of 3% surface impacts within sage grouse habitats as needed for the continued persistence of the species. We believe that while the cited scientific articles do present solid science that sage grouse are sensitive to loss of sagebrush habitats and indirect impacts from road traffic, noise, etc., the GSGCM report takes a very extreme stance that is not supported in the cited articles that effectively halting any further realistic land-use activities within sage-grouse habitat is needed to protect the species.			
8.	The County further questions the viability of restricting access to leased or unleased federal fluid mineral estate by helicopter-portable drilling methods in priority habitat areas without the ability to transport the gas to market. This is especially challenging when there may already be seasonal timing restrictions are already in place. "Alternative B" on Page 22 of the National SGS Report appears to be more reasonable as it provides an opportunity for energy development to occur so long appropriate mitigation measures are also being pursued. The County recommends that the EIS contain an alternative that is consistent with this approach rather than a complete NSO alternative with very limited (3%) disturbance rules.	All	Both	emc0058RM
9.	With regards to anthropogenic disturbances and their distance relationship to lek sites, it is the BLM's responsibility to allow no further disturbances to take place within a 5.5 mile radius of lek sites.	All	BLM	emc0074RM
10.	Balancing Protection of Natural Resources In order to maintain valuable ecological functions across the landscape, we believe that it is preferable to direct development away from areas of high conflict and sensitive resources and towards areas of low conflict, such as previously disturbed sites, areas adjacent to previously disturbed sites, and locations that minimize construction of new roads and transmission lines. This position is consistent with the intent of the ELM's Instructional Memorandum No. 2011-061.	All	Both	rmc0020RM
11.	Air Quality We recommend that the EISs also analyze the air quality implications of proposed conservation measures. We are especially interested in how conservation measures influence fugitive dust, wind erosion, wind-borne particulate matter, and construction emissions, operational emissions from energy and mineral development, and smoke, both within and outside of greater sage-grouse conservation areas	All	Both	rmc0020RM
12.	Man-Made Disturbance in Areas of Low-Quality and Degraded Sage-Grouse Habitat There should be a positive, proactive relationship between sage grouse, man-made disturbance, and restoration of low-quality and degraded sagebrush communities (R-values as explained in the attachment: Greater Sage-Grouse Habitat Categorization). Because sage grouse habitat is a special issue, we need a special classification of disturbance pertinent to the issue. On a case by case basis, we need a disturbance classification that supersedes permitted disturbance limits (e.g., 5 acres per notice on BLM administered lands, Plan of Operations, and EAs) and that makes consideration for low quality or degraded (R3/X3 juniper/pinion encroachment and R4/X4 cheat grass and noxious weeds) sage-grouse habitat. All disturbances must be bonded and reclaimed, at operator's expense, to appropriate vegetation. In sage-grouse country, that vegetation would be suitable for sage-grouse habitat. To the extent that disturbance can be conducted on or routed through low quality sage-grouse habitat, especially R3/X3 and R4/X4 areas, reclamation can only improve, not degrade, habitat for sage-grouse. In these areas, disturbance and its requisite reclamation to sage-grouse habitat should be encouraged by not having the disturbance count against the permitted limit. This is one way to get the sage-grouse habitat	All	Both	emc0-250GB

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	issue to win-win through multiple use of the land.			
13.	The plan amendments will need to specify which use or user will have priority to create new disturbances within habitat areas. The first-come, first-served approach may not be in the long-term public interest.	All	Both	emc0376GB
14.	The plan amendments will need to specify whether surface disturbance limitations will include the existing disturbance or just new disturbance after the effective date of the amendments.	All	Both	emc0376GB
15.	Specifically, VGC is concerned about the large-scale land use restrictions and prohibitions - including the withdrawal of lands with high-priority sage grouse habitat from mineral entry - that is proposed in Instruction Memorandum ("IM") IM-2012-044, "BLM National Greater Sage-Grouse Land Use Planning Strategy" and in the December 2011 National Technical Team Report entitled, A Report on National Sage-Grouse Conservation Measures ("the NTT Report"). If implemented as currently proposed, these draconian conservation measures will thwart mineral exploration and development and other private-sector uses of public land under the guise of sage-grouse habitat conservation.	All	Both	rmc0029RM, rmc0060GB
16.	Priority and general habitat, as recommended by the NTT, must be diligently designated to ensure that all key habitat areas are considered in management planning processes. Priority habitat should include all winter range, breeding habitat and migration corridors for sage grouse and policies on disturbances should be based on peer-reviewed science and technical reports from federal agencies and NGO's.	All	Both	emc0380GB
17.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Tall structures and associated activities in greater sage grouse habitat may lead to negative impacts on greater sage grouse.	All	Both	emc0343GB
18.	BLM is in reality only making some changes, often meager, in some new activities even in the Priority zone- while all the existing damage, and the meager and inadequate project "mitigations" that have been used in the past as conservation measures remain with relatively minor changes made. Avoidance distances are greater. But it is now known that applying avoidance periods during construction while letting the development proceed, does not achieve conservation. NTT at 21. "We do not include timing restrictions on construction and infrastructure because they do not prevent impacts of infrastructure (e.g., avoidance, mortality) at other times of year, during the production phase, or in other seasonal habitats that are crucial for population persistence (e.g. winter Walker et al. 2007)." Stripping seasonal avoidance periods means that "take" and harassment of birds during construction is much more likely to occur during construction. While we recognize the gat inadequacy of these measures, WWP is very concerned that this aimed more at allowing project to be rapidly ripped in - destroying nests, killing nesting birds, etc. This is in fact a huge gift to developers. If BLM allows development to occur by saying it doesn't make any difference - the grouse are doomed anyway - this would still appear to violate the Migratory Bird Treaty Act.	All	BLM	emc0411GB
19.	BLM is to: - Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership. These features are: paved highways, gravel roads, transmission lines,	All	BLM	emc0411GB

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	substations, wind turbines, oil and gas wells, geothermal wells and facilities, pipelines, landfills, homes and mines. This definition purposefully omits fences that kill sage-grouse, livestock water developments that promote West Nile virus and severe degradation of de-watered spring habitats, and degraded upland habitats. Spring developments dry up or greatly reduce flows and shrink meadow and other brood rearing areas. It omits disturbance such as imposing large herds of livestock - including in combination with damaging facilities and management practices. The degree and severity of understory degradation into areas where pipelines or roads are built - are habitat-degrading anthropogenic disturbances associated with livestock grazing. Livestock grazing disturbance is an imposed impact caused by man. Domestic livestock are not native to the sagebrush biome (Mack and Thompson 1982), and are imposed by humans with catastrophic historical degradation and loss, and chronic continuing harm- including landscape-level desertification, and loss of habitats and populations. Plus this ignores blocks of private cropland and activities that may already occur in these habitats. How are these going to be dealt with? Careful examination of the wording shows that lands could be completely torn to pieces, but BLM will be able to look at the direct bulldozed disturbance, and not the real ecological Footprint or impact of the disturbance. For example, there is a large difference between the many square mile visual Footprint of a wind turbine, and the bulldozed footprint where turbines are placed- the difference is square miles vs. small fractions of a mile.			
20.	BLM narrowly defines disturbance when it comes time to mitigate impacts - which unfortunately these days usually means having a developer throw money at studies or woody vegetation treatment, and ignore mitigation by avoidance - i.e, appropriate siting, thus not building projects in sensitive lands.	All	BLM	emc0411GB
21.	This 3% disturbance threshold ignores the spatial configuration of the 3% of disturbances within any given land unit, as well as the cumulative impacts of all of these "anthropogenic" disturbances, along with the livestock grazing facilities and disturbances that would also be occurring in this same land area. Plus there are usually many pre-existing disturbances -such as roads, vegetation treatments, etc. that have fragmented, altered destroyed sagebrush habitats.	All	Both	emc0411GB
22.	Under the 3% more new Development scheme, the sagebrush habitat could be crisscrossed by myriad roads, powerlines, gas pipelines, and wind towers placed in several areas. On top of these would be occurring all the other "anthropogenic" disturbances like grazing. All direct, indirect and cumulative impacts of which must be fully assessed. Yet the tattered Core/Priority area still would not exceed 3% new development under this arbitrary definition. So habitats could be 100% disturbed by grazing, all existing roads remain, and the land be additionally chopped apart with new linear livestock water pipelines, natural gas pipelines, wind farms, mines, etc. NTT at 7-8 defines the new allowed disturbance as "discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership. Anthropogenic features include ..paved highways, graded gravel roads, transmission lines.." This also seems to assume that disturbance is neat and tidy, and all its effects are predictable and stay confined to the 3%	All	Both	emc0411GB

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	land area. This of course is seldom of ever the case. Small disturbances can promote weed infestations that promote wildfires that flash across the landscape, especially in lands that suffer large-scale degradation from livestock grazing and trampling impacts, which aids weed spread and domination. Wouldn't it make a difference -given the complete footprint of lines, roads, energy facilities- if all manner of linear development tore up 3% of the land surface of the Priority habitat- compared to a mine in one discrete area or corner of an area tearing up 3%? These arbitrary percentages allowing even more disturbance and habitat destruction are arbitrary. The Core Model, and its development enabling components, which is being used to enable additional oil and gas in Wyoming, should not be applied. Indirect and cumulative effects, such as weed invasion, were not adequately examined in those energy field studies - which looked at a snapshot of time, and then made sweeping assumptions. What happens with mid and long-term losses as habitats get choked with weeds emanating outward from linear disturbances, or other similar effects? The condition of the habitat, the status of the population, and how severe habitat loss and fragmentation has already been, all must serve as the basis for understanding how much disturbance must be decreased, rolled back, and the degree to which habitats must be protected and both actively and passively restored. Nearly all of the biome has many fewer sage-grouse at far lower densities - and often existing in naturally fragmented habitats - such as Basin and Range topography, on top of which areas have been fragmented by wildfire or human development. The model allows large amounts of linear disturbances. These would have a far greater ecological footprint than the 3% disturbance.			
23.	The cumulative impacts of all disturbances must be examined. Any assessment of disturbance must include the total Footprint of an activity, and must include grazing disturbance and fire, as well. Habitats are often subject to 100% disturbance use by livestock. BLM simply cannot allow 3% more disturbance on its lands. It cannot allow "disturbance" to just be considered the bulldozed land area of a project, and not grazing.	All	BLM	emc0411GB
24.	While it is easy to list "remove or re-inject water" to limit mosquitoes - just how does one remove water from artificial created roadside berm puddles, and all manner of other stagnant water areas created by oil and gas energy development, mining, industrial wind and associated roading, and livestock facilities across public lands? Plus what pollutants are in re-injected water - and how much could this harm wildlife waters, aquatic habitats, and humans?	All	BLM	emc0411GB
25.	A clear framework must be established that triggers mitigation by avoidance –i.e. not claiming that building a project in important occupied habitats can be mitigated.	All	Both	emc0411GB
26.	As landscapes have become increasingly altered, degraded and fragmented, opportunities for "mitigation" by replacing habitats has often become difficult. This is especially the case since sage-grouse habitat needs are complex, and the specific assemblage of habitat features required for a population to be sustained are often just not available elsewhere. So we are to a point now that any additional losses of sagebrush habitats simply cannot be effectively mitigated in many instances. Mitigation by avoidance must be practiced. A clear framework to assess the adequacy of	All	BLM	emc0411GB

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	mitigation up front, and allow agencies to say no to projects before they progress to the point of rights-of-way, exploratory development, etc. must be provided. BLM must fully consider removal/cessation of grazing disturbance over large areas to be passive restoration that serves as mitigation. BLM must amend all Land Use Plans to allow for grazing permit retirement to accomplish this.			
27.	The section "Calculating the Density of Disturbance within Key Habitat" describes conducting an "additional site-specific analysis of disturbance" after alternatives and a preferred alternative have been selected. Intensive site-specific information needs to be collected and analyzed to guide the development of alternatives and a Preferred Alternative before putting out a DEIS. This has not been done. Several potential route segments that BLM is allowing to be put forward are the dead opposite of co-locating or bundling lines.	All	BLM	emc0411GB
28.	This sage-grouse process must require that mitigation by avoidance be placed first and foremost. Developers must be required to find other areas.	All	Both	emc0411GB
29.	At minimum, the NEPA analysis should address the following: • Providing NSO buffers of at least 2 miles and up to 4 miles inside core areas to protect breeding and nesting habitats from impacts.	All	Both	emc0343GB
30.	At minimum, the NEPA analysis should address the following: • Evaluating winter habitat and placing key wintering areas with an adequate buffer (at least 2 miles) off-limits to industrial activity.	All	Both	emc0343GB
31.	At minimum, the NEPA analysis should address the following: • Identifying key early and late brood-rearing habitats and placing them off-limits to industrial use, with a biologically adequate buffer.	All	Both	emc0343GB
32.	It is critical for BLM to consider implementing the following technical team recommendations as minimum standards: * Fully protect priority habitat from large scale disturbances (e.g. transmission lines, oil and gas wells, graded roads etc.) that will harm sage-grouse populations. * If priority habitat can't be fully protected from large-scale disturbances due to existing rights, minimize impacts by limiting disturbances to one per section with no more than 3% surface disturbance. * Ensure that small scale disturbances don't disturb more than 3% of each priority area.	All	BLM	fln0000rm
33.	Also a fact that is not accounted for or disclosed in the GSGCM report, is that the literature cited to support the Conservation Measures are from studies which all took place in highly developed natural gas and CBM fields in Wyoming, where in many cases the density of well pads was often near 15 pads per section (40 acre spacing), and that the studies took place in areas that also had other significant surface impacts (e.g., water evaporation ponds, roads, pipelines, compressor stations and gas plants, as well as infill projects; e.g., Jonah Field (I & II}, Pinedale Anticline, Powder River Basin, Continental Divide-Crestone project, etc.). We feel that while these studies may be applicable for sage-grouse direct and indirect impacts adjacent to high density gas field development in Wyoming, it is not accurate or appropriate to reference the types	CO	Both	emc0058RM

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	of impacts seen in some of the highest density gas fields in the U.S. and apply conservation measures arbitrarily and equally to all habitats in all States and Counties. We interpreted the results presented in these articles as indicating that within 0.25 to 1.5 miles of very intensive natural gas/CBM field development there are significant decreases in sagegrouse habitat utilization, and that the further habitats are from intensive land use activities, the less impact there is. But we again contend that the results of these studies do not indicate that 4 mile buffers are warranted for the protection of the species, and that the GSGCM report, while referencing these studies as its scientific basis, does not accurately reflect the facts presented in the studies, and if anything presents a biased interpretation of the results. The GSGCM report's Conservation Measures appear to only consider the needs sage-grouse in remaining habitats in Wyoming, and does not accurately account for or respect the ongoing uses, needs, of other permitted uses of public, and more importantly, of private lands. While the long-term protection of greater sage-grouse is also important to the County, we believe that more balance and a more realistic land use management process is needed and should be incorporated into any management planning efforts.			
34.	The NTT Report recommends a 3% disturbance threshold across landownership. At the time of the Draft, the EIS should clarify what is meant by 3% disturbance and if it includes habitat treatments or just anthropogenic disturbance such as roads, well pads, and power lines. The EIS should clarify how this analysis will be done, especially when considering disturbance on private lands. The EIS should also include an analysis of the current/baseline amount of disturbance within PPH in North Park. Because BLM regulations do not apply on private lands, the BLM should address why private lands cannot be excluded from the PPH and PGH maps for the purposes of this EIS.	CO	BLM	emc0060RM
35.	The bright line prohibitions mandated by "no surface occupancy" areas where "no future development" can occur may seem reasonable on paper, but may actually be counterproductive when compared to boots-on-the-ground oversight. We believe that a more reasonable approach would be to designate sensitive habitat areas, and then only allow development in or around such designations after review by BLM and state stewards with the operator as described in the recent examples above. This would not only better protect Sage Grouse habitat, but would also be more in keeping with the multiple use and public interest standards traditionally underpinning recent RMP and EIS documents issued in the State of Colorado.	CO	BLM	emc0073RM
36.	The radius of 4 miles given to each known operating lek is inadequate. The circumference for each lek needs to be raised to a MINIMUM 5.5 mile radius, therefore increasing overall coverage of all priority habitats. Mere “adequate” coverage, when considering this plan covers the span of 20 years, negates the whole preservation and enhancement of current greater sage grouse numbers. Current data suggesting a 4 mile radius is enough does not plan for the future.	CO	Both	emc0074RM
37.	The following recommendations must be analyzed as a starting point for effective conservation: Fully protect priority habitat from large scale disturbances (e.g., transmission lines, oil and gas wells, graded roads, etc.) that will affect population distribution and abundance at any level.	CO	BLM	emc0070RM
38.	The BLM should consider a ‘conservation alternative’ that: - Includes conservation measures recommended by the NTT Report, with improvements, including, but not limited to the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species.	CO	BLM	emc0070RM

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	o Implement range management practices outlined by the NTT, with addition of further conservation measures, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,31 thus negating the value of designated priority habitats. Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT.			
39.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: ACECs can be designated for habitat, but also for historic, cultural and scenic values. BLM should prioritize ACEC designation for lands that contain priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. This approach will allow BLM to ensure that ACECs maximize protection of multiple sensitive resource values benefiting a range of user groups.	CO	BLM	emc0070RM
40.	In the Draft RMP for the Kremmling (CO) Field Office, Alternative C would commit the BLM to: .proactively identify, protect, and improve wildlife habitat, including treatments for the benefit of sagebrush-dependent species, especially in areas identified as historical habitats. Alternative C would include establishing reference areas that would be used as control groups for evaluating management activities in sagebrush habitat. In sage-grouse core areas within the Planning Area, BLM-managed public lands would be closed to oil and gas leasing. Draft RMP32 at 2-24. Alternative B (preferred alternative) would prohibit surface occupancy or use in core habitat. Draft RMP at 2-55 – 2-56. Alternative C would prohibit oil and gas leasing in core sage-grouse habitat. Draft RMP at 2-55. Alternative C would also limit surface disturbance in core habitat to one percent at any one time, while Alternative B would limit surface disturbance to three percent at any one time. Draft RMP at 2-74.	CO	Both	emc0089RM
41.	The modifications to the RMP should not include restrictions that exceed those established by Colorado Parks and Wildlife (CPW) for surface use or mineral development with respect to the Greater Sage Grouse. We have implemented a process for the utilization of the stipulations and Best Management Practices developed by CPW throughout Colorado.	CO	Both	rmc0050RM
42.	It is critical for BLM to consider implementing the following technical team recommendations as minimum standards - Fully protect priority habitat from large scale disturbances (e.g. transmission lines, oil and gas wells, graded roads etc.) that will harm sage-grouse populations. - If priority habitat can't be fully protected from large-scale disturbances due to existing rights, minimize impacts by limiting disturbances to one per section with no more than 3% surface disturbance. - Ensure that small scale disturbances don't disturb more than 3% of each priority area.	CO	Both	flm0000RM

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43.	It is critical for BLM to consider implementing the following technical team recommendations as minimum standards: • Fully protect priority habitat from large scale disturbances (e.g. transmission lines, oil and gas wells, graded roads etc.) that will harm sage-grouse populations. • If priority habitat can't be fully protected from large-scale disturbances due to existing rights, minimize impacts by limiting disturbances to one per section with no more than 3% surface disturbance. Ensure that small scale disturbances don't disturb more than 3% of each priority area.	CO	BLM	fll0000RM
44.	i. Lander, WY RMP The Lander draft RMP proposes extending seasonal wildlife protections to identified operations and maintenance (O&M) activities in non-Designated Development Areas, if those activities are identified as detrimental to wildlife (Alternative D). As noted in the DEIS, this action "would not preclude development or limit the number of wells and would result in no more adverse impacts than management under Alternative A, which does not have timing limitations on O&M" (DEIS at 649). Extending seasonal protections beyond the development/construction period will benefit wildlife during the sensitive winter and nesting periods. Protections would be instituted for activities like fracking, power line reconstruction, range improvements, and road maintenance. As recognized by the DEIS, these activities can "stress and disturb wildlife during the sensitive winter and nesting periods due to the time it takes to complete the work, the level of noise generated, and the presence of people and equipment. It is expected that project O&M activities would result in both short-term adverse impacts related to animal displacement and long-term adverse impacts if the level of activity results in area avoidance or loss of nests or young" (DEIS at 818). We strongly encourage the BLM to adopt this provision.	East	Both	emc0089RM
45.	i. Lander, WY RMP Alternative B also prohibits new permanent structures taller than 12 feet within 1 mile of occupied nesting habitat. We strongly support this as a means to prevent area avoidance by sage-grouse.	East	Both	emc0089RM
46.	i. Lander, WY RMP Reclamation should be mandatory and managers must recognize that methods for achieving success vary by region and are site-specific. Reclamation efforts should be monitored and results maintained in a single database to improve our understanding about effectiveness of such efforts. In addition, a process should be established to identify and address failed reclamation projects. Successful reclamation of surface disturbance is necessary to establish connectivity within previously fragmented habitats and to achieve and maintain ecosystem function (DEIS at 864).	East	Both	emc0089RM
47.	The following recommendations must be analyzed as a starting point for effective conservation: Fully protect priority habitat from large scale disturbances (e.g., transmission lines, oil and gas wells, graded roads, etc.) that will affect population distribution and abundance at any level.	East	Both	emc0089RM
48.	iv. The BLM and FS should analyze an alternative that provides more protection than that afforded by implementation of the National Technical Team's Recommendations. The BLM and FS should consider an alternative that: - Includes conservation measures recommended by the NTT Report. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended	East	Both	emc0089RM

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	by the NTT. - Incorporates improvements to the NTT's recommendations, including the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with improvements, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,10 thus negating the value of designated priority habitats. o Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions.			
49.	iii. Strong components of Wyoming's approach Future surface disturbance is minimized by encouraging co-locating disturbances within already disturbed areas or those that are naturally unsuitable for grouse.	East	Both	emc0089RM
50.	11. The Agencies Should Carefully Consider Use Of Mitigation And Ensure That Mitigation Generates Net Conservation Benefits BLM's habitat mitigation policy, codified at 43 C.F.R. § 1508.20, lists habitat mitigation actions in descending order of preference: avoidance, minimization, rectification, reduction, and compensation. As BLM considers the siting and impacts of proposed new energy projects, it must keep in mind this mitigation hierarchy and consider "avoidance" the foremost objective. The BLM and FS should require off-site mitigation for impacts which cannot be mitigated onsite, or where landscape approaches to mitigation offer opportunities to address conservation needs on a larger scale while generating net conservation benefits for sage-grouse. Off-site mitigation should follow these guidelines: 1) be a "net conservation benefit" requirement for resources and values; 2) a requirement for project developers to fund mitigation efforts based on the amount and value of the land impacted from development; 3) a centralized body should be established to oversee the funds and maximize the effectiveness of their use; and 4) off-site mitigation should be required to take place in the same ecoregion as the project site. The increase in compensation and offsite mitigation will require careful management and new approaches. The importance of mitigation was reinforced on January 14, 2011, with the release of the new CEQ Guidance on "Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact."	East	Both	emc0089RM
51.	NEPA requires that BLM discuss mitigation measures in an EIS. (40 C.F.R. §§ 1502.14, 1502.16.) In order to show that mitigation will reduce environmental impacts to an insignificant level, BLM must discuss the mitigation measures "in sufficient detail to ensure that environmental consequences have been fairly evaluated." 25 Simply identifying mitigation measures, without analyzing the effectiveness of the measures, violates NEPA. Agencies must "analyze the mitigation measures in detail [and] explain how effective the measures would be .."A mere listing of mitigation measures is insufficient	East	Both	emc0089RM

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	to qualify as the reasoned discussion required by NEPA."26 NEPA also directs that the "possibility of mitigation" should not be relied upon as a means to avoid further environmental analysis.27 Further, general statements that BLM will conduct monitoring are also not an appropriate form of mitigation. Simply monitoring for expected damage does not actually reduce or alleviate any impacts.			
52.	Key considerations for off-site mitigation should include: - Identification of uses, resources and values associated with the project site. Establishing the connection between off-site mitigation and the resources of the public lands will require detailed understanding and knowledge of the values and uses present on the project site before development occurs, such as wildlife habitat, various recreational uses (ranging from hunting to bird watching to all terrain vehicle use) and scenic values. BLM should require that necessary inventory of the project site be completed prior to developing off-site mitigation measures. - Requirements for project developers to fund mitigation efforts based on the amount and value of the land impacted from development. Project developers should be required to make deposits to a mitigation fund based on the amount of land used for the project and the fair market value of that land, the costs of any restoration or enhancement actions necessary to produce a net conservation benefit, and the stewardship costs necessary to maintain conservation benefits over time. - If funds are received as a part of mitigation, a centralized body should be established to oversee the funds and maximize the effectiveness of their use. BLM should establish a centralized body comprised of BLM staff, and other federal and state agencies with expertise and interest to oversee the distribution of funds and maximize the effectiveness of their use. This body should be required to take into consideration recommendation from the public in the distribution of funds.	East	Both	emc0089RM
53.	Mitigation protections will require additional and ongoing monitoring to determine effectiveness. There is an important distinction between the monitoring required to assess effectiveness of mitigation, and research or monitoring completed in lieu of on-the-ground mitigation. We do not support research funding as a substitute for compensatory habitat mitigation applied on the ground.	East	Both	emc0089RM
54.	BLM and FS should put in place a "net conservation benefit" requirement for the mitigation of impacts to resources and values. BLM should ensure that any loss of resources or values on a development site is compensated with the addition and protection of equivalent or better resources and values offsite with appropriate assurances that conservation values will be maintained for at least as long as project impacts persist. BLM and FS should also make a determination about the value of the habitat to be impacted and adopt direction for mitigation requirements for the specific habitat types impacted. For example, for high quality habitat which is relatively scarce or becoming scarce on a national basis or in the ecoregion section 28, BLM policy should ensure a net gain of in-kind habitat value. Additions of lands and resources should exceed the value of any resources lost. Additions could be gained through restoration and research efforts to improve the quality and quantity of equivalent resources and values off-site. Mitigation for impacts to water resources could be addressed by purchase and retirement of water rights to offset groundwater pumping by the project.	East	Both	emc0089RM
55.	Recommendations: Greater sage-grouse efforts and mitigation strategies should be designed and continuously monitored to ensure that they are effective and generate net benefits. Mitigation requirements should emphasize avoidance and minimization of impacts. Actions to offset unavoidable impacts should generate net conservation benefits for sage grouse	East	Both	emc0089RM

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	populations and habitats consistent with the conservation purposes and principles of the National Sage-grouse Planning Strategy.			
56.	The NTT report recognizes that BLM is committing "to a new paradigm in managing the sagebrush landscape." NTT at 6. The report further recognizes that: [The] new paradigm will require collaborative conservation efforts among private, state, tribal, and other federal partners to conserve sage-grouse. Land uses, habitat treatments, and anthropogenic disturbances will need to be managed below thresholds necessary to conserve not only local sage-grouse populations, but sagebrush communities and landscapes as well. The NTT also observed that "development on private lands, which is not subject to mitigation, will focus greater needs for conservation of sage-grouse and sagebrush on public lands." Report at 12. The point is well taken that the remaining habitat on federal lands must be prioritized for protection because we have less control over management decisions on private holdings.	East	Both	emc0089RM
57.	We believe that federal agencies should consider three viable options for furthering habitat conservation efforts on private lands. First, the agencies' approach can be integrated with private land conservation benefits provided by the National Resource Conservation Service's Sage Grouse Initiative (SGI): Second, biodiversity offsets for greater sage-grouse are discussed in Doherty et al. (2010b): "The simplest and most cost effective first step in conservation is to halt the large-scale actions that further reduce or eliminate the largest populations in the best remaining landscapes." BLM and FS should consider using the approach outlined in this paper to develop methods to forecast population losses that will result from unavoidable development of valid existing rights, and to ensure that offsite mitigation permanently reduces similar risks to other sage-grouse populations of equal size. The analyses and recommendations in this paper should be carefully considered when designing conservation strategies and taking account of cross-jurisdictional issues.	East	Both	emc0089RM
58.	We believe that federal agencies should consider three viable options for furthering habitat conservation efforts on private lands. First, the agencies' approach can be integrated with private land conservation benefits provided by the National Resource Conservation Service's Sage Grouse Initiative (SGI): Third, another potential resource to consider when developing a collaborative approach to conservation across boundaries is the Framework for Mitigation of Impacts from Infrastructure on Sage-grouse and Their Habitats, developed by the Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse State Advisory Committee. The Idaho Mitigation Framework (December 6, 2010) is labeled a "Discussion Paper Final Draft" but has not yet been adopted. This draft framework, the result of a stakeholder process, may offer some guidance and helpful concepts for habitat conservation on non-federal lands, thereby complementing conservation strategies on federal lands. According to the summary: [T]the Mitigation Framework would serve as a science-based "mitigation module" that project developers and government regulators could use to achieve compensatory mitigation objectives called for in project plans and permits. While compensatory mitigation may help offset certain impacts arising from infrastructure projects, mitigation should not be considered a substitute for first avoiding and then minimizing impacts. In addition, it is important to recognize that federal and state regulatory or land-management agencies, and county or local governments may also	East	Both	emc0089RM

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	require additional stipulations, conditions of approval or other requirements as well as on-site mitigation, in accordance with applicable law, regulation or policy. Discussion Paper Final Draft at 1.			
59.	i. Lander, WY RMP Alternative B addresses the important protection of natural functions in riparian-wetland areas, providing important benefits to sage-grouse. In the arid western states, the value of riparian wetland communities is inversely proportional to their physical extent - supporting the greatest diversity of plant and animal life of all habitat types (DEIS 343, DEIS 351). Actions that iimprove riparian-wetlands would improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects. Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Alternative B prohibits surface disturbing activities within 1,320 feet (0.25 mile) of surface water, riparian-wetland areas, playas, and 100-year floodplains where mapped (except for areas of high and moderate oil and gas potential), and provides important protections for this habitat type.	East	Both	emc0089RM
60.	In the Draft RMP for the Kremmling (CO) Field Office31, Alternative C would commit the BLM to: proactively identify, protect, and improve wildlife habitat, including treatments for the benefit of sagebrush-dependent species, especially in areas identified as historical habitats. Alternative C would include establishing reference areas that would be used as control groups for evaluating management activities in sagebrush habitat. In sage-grouse core areas within the Planning Area, BLM-managed public lands would be closed to oil and gas leasing. Draft RMP 32 at 2-24. Alternative B (preferred alternative) would prohibit surface occupancy or use in core habitat. Draft RMP at 2-55 – 2-56. Alternative C would prohibit oil and gas leasing in core sage-grouse habitat. Draft RMP at 2-55. Alternative C would also limit surface disturbance in core habitat to one percent at any one time, while Alternative B would limit surface disturbance to three percent at any one time. Draft RMP at 2-74.	East	Both	emc0089RM
61.	The Dillion Local Working Group identified 5 key issues in the area: "tie" for 3rd, 3. ii. Conversion and fragmentation of habitat caused by residential subdivision and development	IDMT	Both	rmc0028GB
62.	We believe that federal agencies should consider three viable options for furthering habitat conservation efforts on private lands. First, the agencies' approach can be integrated with private land conservation benefits provided by the National Resource Conservation Service's Sage Grouse Initiative (SGI): Third, another potential resource to consider when developing a collaborative approach to conservation across boundaries is the Framework for Mitigation of Impacts from Infrastructure on Sage-grouse and Their Habitats, developed by the Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse State Advisory Committee. The Idaho Mitigation Framework (December 6, 2010) is labeled a "Discussion Paper Final Draft" but has not yet been adopted. This draft framework, the result of a stakeholder process, may offer some guidance and helpful concepts for habitat conservation on non-federal lands, thereby complementing conservation strategies on federal lands. According to the summary: [T]the Mitigation Framework would serve as a science-based "mitigation module" that project developers and government regulators could use to achieve compensatory mitigation objectives called for in project plans and permits. While compensatory mitigation may help offset certain impacts arising from infrastructure projects, mitigation should not be considered a substitute for first avoiding and then minimizing impacts. In addition, it is important to recognize that federal and state regulatory or land-management agencies, and county	IDMT	Both	emc0089RM

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	or local governments may also require additional stipulations, conditions of approval or other requirements as well as on-site mitigation, in accordance with applicable law, regulation or policy. Discussion Paper Final Draft at 1.			
63.	The rancher's love of the land is the only thing protecting private land in northeast Montana from the development that has harmed sage grouse elsewhere.	MT-RM	Both	emc0013RM
64.	The Little Missouri Grazing Association (LMGA) has taken a proactive approach towards the sage-grouse. We have two years of habitat monitoring data collected. We also have data showing historical grazing use showing that the stocking rates have not changed in many years. The land use practices have not changed. We have no oil & gas impact and no industrial encroachment.	ND	Both	emc0039RM
65.	Instead, "mitigation" for development impacts on Sage Grouse and priority habitats is often proposed by project proponents and seemingly automatically accepted by the agencies. Or, mitigation funds can be used for other purposes, including making up for agencies' budget shortfalls. It is difficult if not impossible for the public to track the use of "mitigation" funds - how, where and when funds were expended and what benefits or costs resulted to either Sage Grouse or its habitat. Annual reporting on the implementation of agencies' Sage Grouse conservation measures, including the use of required mitigation funds, must be a land use plan requirement. For example, the public is currently unable to access the effectiveness of required and voluntary mitigation, especially about $15 million in financial mitigation paid by the proponent of the Ruby gas pipeline project in northern Nevada to the BLM, the USFWS, NDOW, and other private organizations. No mitigation funds should be required or accepted by agencies without a mitigation plan with quantified goals and objectives and full accountability for the use of mitigation funds to the public through annual reporting of funds expended and the results of effectiveness monitoring. We have other conservation measures to recommend for inclusion in the EIS.	NVCA	Both	emc0283GB
66.	The ODFW files should provide specific information and the basis of an initial assessment on Public Improvements related to wildlife programs in eastern Oregon. In addition, to determine potential economic impacts; in conjunction with BLM/FS and DOGAMI staff conduct an inventory of Federal and State lands containing active and inactive borrow pits, and their remaining accessible and potential reserves and availability for use on Public Improvement projects. The EIS then should determine the replacement costs for materials withdrawn from the inventory due to the ODFW management recommendations.	OR	Both	rmc0036GB
67.	Address Impacts of Development: Industrial development, whether for fossil fuels or renewable sources, has habitat impacts. BLM should recognize the research that clearly demonstrates the impacts from roads, noise, infrastructure, and increased predator access, and protect priority sage-grouse habitat accordingly.	OR	Both	emc0385GB
68.	The Interim Memorandum (IM) and adjoining technical report do not provide mineral developers with any ability to mitigate for impacts on sage-grouse habitat. One principal effectively learned over the past 25 years of Endangered Species Act (ESA) management is that mitigation can be a very effective tool to conserve a species and allow responsible development simultaneously. In many instances, industry mitigation has been the catalyst for recovery of species in the West. The assumption within the IM is that forcing industry off Federal lands will recover the species. The BLM should consider the establishment of a mitigation program that project proponents may voluntarily use to facilitate the allocation and management of mitigation dollars to fund sage-grouse habitat improvement projects. Such programs would support Uintah County's plan of allowing development in marginal sage-grouse habitat and utilizing mitigation dollars to enhance	UT	Both	emc0376GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	habitat in sage-grouse areas designated by the County plan.			
69.	i. Lander, WY RMP The Lander draft RMP proposes extending seasonal wildlife protections to identified operations and maintenance (O&M) activities in non-Designated Development Areas, if those activities are identified as detrimental to wildlife (Alternative D). As noted in the DEIS, this action "would not preclude development or limit the number of wells and would result in no more adverse impacts than management under Alternative A, which does not have timing limitations on O&M" (DEIS at 649). Extending seasonal protections beyond the development/construction period will benefit wildlife during the sensitive winter and nesting periods. Protections would be instituted for activities like fracking, power line reconstruction, range improvements, and road maintenance. As recognized by the DEIS, these activities can "stress and disturb wildlife during the sensitive winter and nesting periods due to the time it takes to complete the work, the level of noise generated, and the presence of people and equipment. It is expected that project O&M activities would result in both short-term adverse impacts related to animal displacement and long-term adverse impacts if the level of activity results in area avoidance or loss of nests or young" (DEIS at 818). We strongly encourage the BLM to adopt this provision.	WY	Both	emc0089RM
70.	i. Lander, WY RMP Alternative B also prohibits new permanent structures taller than 12 feet within 1 mile of occupied nesting habitat. We strongly support this as a means to prevent area avoidance by sage-grouse.	WY	Both	emc0089RM
71.	iii. Strong components of Wyoming's approach Future surface disturbance is minimized by encouraging co-locating disturbances within already disturbed areas or those that are naturally unsuitable for grouse.	WY	Both	emc0089RM
72.	i. Lander, WY RMP Alternative B addresses the important protection of natural functions in riparian-wetland areas, providing important benefits to sage-grouse. In the arid western states, the value of riparian wetland communities is inversely proportional to their physical extent - supporting the greatest diversity of plant and animal life of all habitat types (DEIS 343, DEIS 351). Actions that improve riparian-wetlands would improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects. Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Alternative B prohibits surface disturbing activities within 1,320 feet (0.25 mile) of surface water, riparian-wetland areas, playas, and 100-year floodplains where mapped (except for areas of high and moderate oil and gas potential), and provides important protections for this habitat type.	WY	Both	emc0089RM
73.	i. Lander, WY RMP Reclamation should be mandatory and managers must recognize that methods for achieving success vary by region and are site-specific. Reclamation efforts should be monitored and results maintained in a single database to improve our understanding about effectiveness of such efforts. In addition, a process should be established to identify and address failed reclamation projects. Successful reclamation of surface disturbance is necessary to establish connectivity within previously fragmented habitats and to achieve and maintain ecosystem function (DEIS at 864).	WY	Both	emc0089RM

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	RIGHTS of WAY ISSUE: The proposed Conservation Measures fail to address ROW maintenance roads becoming roads for the general public. Most low and mid-elevation powerline / gas line / communications line ROW's become OHV trails and eventually roads for the general public. See discussion on individual OHV use under Travel and Transportation. The only mitigation available is signage stating that a maintenance road is closed to public travel; the signage is universally ignored. Because the Measures identified ROW's as potential discrete disturbances, the use of the ROW road by the individual public OHV user must also be a discrete disturbance.	All	Both	emc0083GB
2.	IPC's service area overlaps with greater sage-grouse habitat in Idaho and Oregon and actions the Bureau of Land Management (BLM) and U.S. Forest Service (FS) implement to protect greater sage-grouse will affect our ongoing operation and maintenance activities and construction of new distribution and transmission lines.	All	Both	emc0090GB
3.	The NTT report recommends that in areas where the three percent disturbance threshold has already been exceeded, that no other anthropogenic disturbance be permitted until habitat has been restored to maintain the area under the threshold. The NTT report then recommends collocation of disturbances and consideration of a new ROW authorization only if the disturbance is confined to the area previously disturbed by the existing ROW. Collocation within an existing ROW is not always feasible depending on the proposed and existing facility. Idaho Power and other utilities operate under regulations promulgated by the Federal Energy Regulatory Commission (FERC), Western Energy Coordinating Council (WECC), and North American Electric Reliability Corporation (NERC). In order to avoid large-scale blackouts, utilities are required to maintain separation between lines (the distance depends on the electrical pathway, capacity rating, and voltage of the line) and this would preclude collocating some facilities within the same ROW. Rather than a blanket requirement that facilities must be located within an existing ROW, the BLM should consider an alternative that allows for separation distances between facilities; this could be similar to the requirements in the Wyoming Governors' Executive Order 2011-51	All	Both	emc0090GB
4.	It is also not clear how the BLM will address corridors established as part of the West-wide energy corridor (WWEC) programmatic decision. These are designated energy corridors, but they may not yet be encumbered with ROWs. Based on the NTT's recommendations, only corridors already encumbered with a ROW should be considered for additional ROWs. The BLM must address how the WWEC in priority and general habitat will be addressed in land use planning.	All	Both	emc0090GB
5.	The NTT recommends the planning process identify opportunities to remove, bury, or modify existing power lines within priority habitat areas. As part of its analysis, the BLM must consider the cost to utilities and ratepayers to convert overhead lines to underground lines and how underground lines can affect a utility's ability to quickly identify and repair an outage. Ground disturbance may also be significantly higher for underground lines than overhead lines because of trenching activities and installation of pulling vaults. While there are some advantages to underground lines, these are not the panacea that some perceive them to be. For a detailed discussion on high voltage underground transmission lines, please refer to section 2.6.4 of the July 2011 Gateway West Transmission Line Draft Environmental Impact Statement prepared by the BLM. While underground distribution lines are more feasible than transmission lines, they also cost more than overhead lines and result in increased ground disturbance during construction and maintenance activities.	All	Both	emc0090GB
6.	Modifications to power lines and structures commonly suggested by the BLM include designing towers or the use of	All	Both	emc0090GB

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	anti-perching devices to prevent raptor perching and installation of markers to reduce collisions. Designing towers to prevent raptors from using them as perches is not feasible for larger transmission structures (e.g., lattice steel towers) due to the increased cost and size of the structures, and has limited value for smaller distribution structures. Moreover, the use of anti-perching devices has consistently been shown to be ineffective.2 Furthermore, the installation of daytime visual markers on guyed towers should be assessed on a case-by-case basis where collisions have been identified as an issue and should not be anautomatic requirement for all new lines. In both cases, the installation and long-term maintenance of anti-perching and line-marking devices can increase project costs substantially while not resulting in significant protections for birds.			
7.	Rights of Way The NTT Report suggests possibly removing, burying, and modifying existing power lines that are within PPH areas. Burying transmission lines is an extremely costly venture, and may make many projects uneconomical. We feel that this mitigation should only be used in extreme circumstances in which studies indicate that there is very high value in burying such transmission lines in very localized cases, and in exchange for this mitigation, proponents receive high value in other proposed actions within the PMU. For example, a proponent could offer to bury an existing power line segment through high-value PPH as mitigation to a new proposed impact. The mitigation should more than offset the impact of the proposed new development.	All	Both	emc0108GB
8.	In regard to new overhead, wood pole, transmission and distribution lines typically utilized by rural utilities to transmit power over the significant distances that must be covered. the RMP should recognize the limited impact of these projects on sage grouse habitat. Specifically, if such facilities can be routed near existing roads, new permanent ground disturbance is generally not required. In many locations overland ground construction techniques will not require grading and areas temporarily disturbed by vehicle tracks during construction return to their preconstruction condition within a very few years.	All	Both	emc0396GB
9.	Secretarial Order 3285 Amendment I Renewable Energy Development by the Department of Interior (February 22, 20 I 0) and the Energy Policy Act of 2005 encourages the development of renewable and alternative energy resources, as part of an overall strategy to develop a diverse portfolio of domestic energy supplies. Furthermore, S03285Al states that "encouraging the production, development, and delivery of renewable energy is one of the Department's highest priorities." NV Energy requests that potential impacts to the development of renewable energy projects and associated transmission be analyzed in the proposed EIS.	All	Both	emc0198GB
10.	NV Energy is concerned that the renewal of existing right of way grants or special use permits for those transmission and distribution facilities within preliminary priority sage grouse habitat may require significant permitting and mitigation requirements including additional NEPA analysis; undergrounding of existing facilities; relocation of transmission and/or distribution corridors; etc. It is the opinion of NV Energy that these potential mitigation requirements could create greater disturbances and have a more negative effect than what exists presently. Therefore, NV Energy requests that proposed mitigation for existing transmission and distribution infrastructure be analyzed in the EIS. It should be noted mitigation measures including, but not limited to, the relocation of existing electrical infrastructure would directly impact Nevada rate payers.	All	Both	emc0198GB

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11.	Effects of Power Lines on Greater Sage-grouse. Contrary to the statements of the NTT Reports, the effects of power lines on greater sage-grouse have not been established, are poorly understood, and require more research. The NTT Report casually uses Steenhof et al. 1993 (raptor nest research) and Lammers and Collopy 2007 (perch deterrents research) with very little insight on effects of power lines on greater sage-grouse. Lammers and Collopy (2007) discuss that perch deterrents did not have an effect on the observed number of greater sage-grouse predators and concluded that sagebrush conservation may better serve greater sage-grouse populations.	All	Both	emc0399GB
12.	The presence of the power line itself does not seem to be directly or indirectly increasing mortality or reducing overall breeding success. The BLM's LUP process should consider all available science regarding effects of power lines on greater sage-grouse, and identify and disclose areas where scientific information and data are lacking.)	All	Both	emc0399GB
13.	The County request more detailed information in terms of how designation of priority and general habitat will impact current and future rights-of-way. Perhaps this is a topic that could be further discussed at a local workshop	All	Both	emc0130GB
14.	The wildlife buffers and timing restrictions in the current RMP's and Forest Plans make it very difficult to maintain an acceptable level of electrical service. Additional restrictions will add to this burden and may make it impossible to serve established communities when they are located in or near areas containing several habitats of species of concern. We would like to provide a specific example? A large portion of our existing system is constructed on sage flats surrounding the Sevier River Valley. The ROWs are on a mixture of public, state, and private lands that are classified as Deer, Elk and Prong horn crucial winter habitat, which is also classified as active, suitable (currently inactive) or potential reintroduction Utah Prairie Dog habitat, is Greater Sage Grouse nesting, brood-rearing and winter habitat and a winter concentration area for wintering Bald Eagles. It is possible for us to plan our work around restrictions for a few specific species but in this case with this many buffers and restrictions we are left with no significant time period when existing infrastructure can be maintained or required new construction completed. We request that you address this issue in the planning strategy and provide a way in which we can continue to provide electrical service in areas that contain other species of concern with the associated buffers and restrictions in addition to those for the Sage Grouse.	All	Both	emc0150GB
15.	2. The importance of addressing new threats such as transmission lines and wind development.	All	Both	emc0212GB
16.	Sage grouse conservation measures, if too onerous, may also threaten renewable energy generation such as solar and wind power and the new transmission lines (such as the Energy Gateway South and Trans West Express projects) needed to convey such power to market.	All	Both	emc0242GB
17.	Definitive research on whether and to what extent powerlines are significant factor affecting Sage Grouse. There is much anecdotal evidence that powerlines provide perch sites for Common Ravens and other raptors and that Sage Grouse rarely are successful in nesting attempts within a mile or two of a powerline.	All	Both	emc0397GB
18.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: ROW exclusion (such as electric transmission and fluid mineral pipelines	All	Both	emc0234GB
19.	BLM and Forest Service should evaluate planned transmission in this process and should also ensure that broader ongoing transmission planning incorporate conservation measures for sage-grouse, including the Western Electricity Coordinating Council.	All	Both	emc0234GB

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20.	As sources of generation in the West Interconnection change from fossil to renewable resources, there is likely to be a need for additional long distance lines. Early consideration of the geographic location and plans for expansion of remote renewable resources can aid in reducing conflicts between transmission infrastructure and prime habitat for sensitive species like the greater sage-grouse. This EIS process should provide key information and recommendations to ongoing transmission planning and also set out conservation measures based on ongoing transmission planning.	All	Both	emc0234GB
21.	Iterative transmission planning efforts are underway at the state and regional level. The primary clearing house for transmission expansion planning across areas identified as sage grouse habitat is the Western Electricity Coordinating Council (WECC). WECC included environmental data in its Transmission Expansion Planning process and WECC's Scenario Planning Working Group Environmental Data Task Force (EDTF) was tasked with building a decision support tool to allow for a comparison of future transmission alternatives through the lens of environmental and cultural data sets. These data sets provide transmission planners with a method by which to show the relative 'risk' to a project developer of trying to develop a particular route. Lands were screened and classified under four tiers of suitability resulting in a risk determinations dependent upon resources, such as lands with dense sage-grouse populations.	All	Both	emc0234GB
22.	Going forward, EDTF will continue to conduct regular outreach to stakeholders across the West to update, collect and integrate additional environmental and cultural data into this decision support tool for use by regional transmission planners. Within this framework, information regarding greater sage-grouse habitat protection can and should flow two ways. BLM's sagegrouse conservation planning efforts provide an opportunity to incorporate planning efforts for renewable energy generation and transmission expansion based on long-term and west-wide modeling of existing and future renewable energy goals and reliability constraints. Conversely, the BLM should ensure that transmission planning efforts underway at WECC have considered the BLM's efforts to update resource management plans to reflect a future sage grouse conservation policy so that WECC may incorporate this data into future scenario planning through EDTF tools.	All	Both	emc0234GB
23.	Concurrently, the President's Council on Environmental Quality Interagency Rapid Response Transmission Team (RRTT), formed in 2011, has identified five priority transmission lines in the West, and two in the East. These lines are planned for reliability and to promote the development of remotely constrained renewable resources, largely wind. Of the five projects included in the West-SunZia, Cascade Crossing, Boardman to Hemingway, Gateway West, and TransWest Express - four cross within areas identified through BLM's Greater Sage-Grouse Range-Wide Breeding Density Threshold map as having a 25% or higher breeding density. BLM should ensure that the RRTT is made aware of sage grouse conservation efforts and encourage the CEQ to work with BLM and the U.S. Fish and Wildlife Service to incorporate and further develop greater sage-grouse conservation plans within the permitting framework for these priority projects.	All	BLM	emc0234GB
24.	The BLM and Forest Service should ensure that transmission planning efforts underway at WECC have considered their efforts to update land use management plans to reflects a future sage grouse conservation policy so that WECC may incorporate this data into future scenario planning.	All	Both	emc0234GB
25.	The agencies should also ensure that transmission lines under consideration by RRTT are subject to conservation measures set out in this EIS process.	All	Both	emc0234GB
26.	The RMP amendments also should address significant new threats to sage-grouse: electrical transmission lines and wind power developments.	All	BLM	emc0298GB

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27.	Some of the "best practices" being suggested by the IM and NTT Report are unrealistic. For example, the documents suggest burying power lines as a mitigation tool. This is problematic from both economic and engineering perspectives. A number of factors influence the feasibility of burying power lines, including voltage, land use, terrain, soils and geology of the area, density of existing buried facilities (water gas, etc), highway crossings, surface water crossings, floodplains, and presence of other biological and cultural resources of concern. Burying high voltage transmission lines poses a significant operational issue for utilities and would substantially increase the cost of constructing high voltage transmission lines. (The cost of burying a high voltage transmission line can increase overall project cost anywhere from 4-10 times the comparable costs of an overhead line.) Other factors regarding the feasibility of building an underground transmission line include longevity, maintenance and operational issues and increased habitat fragmentation effects. Underground transmission lines have half the life expectancy of overhead transmission lines. There are also reliability concerns: when an outage occurs on an underground line, it is difficult to pinpoint and reach the source of the outage. Repairs take longer and require additional ground disturbance, potentially increasing disturbances to sensitive habitats. Above-ground facilities have been found to be generally compatible with the type of short brush that sage grouse uses for habitat. As a result, above-ground facility ROWs can actually help preserve such habitat. Finally, it is important to note: burying power lines actually carries a significant set of environmental degradation risks. We would point you to comments submitted from the Edison Electric Institute which speak to this issue. In particular, please consider the referenced study from the University of California, which provides a life cycle assessment of the potential environmental impacts of overhead vs. buried power lines.	All	Both	emc0378GB
28.	The IM and NTT Report also suggest relocation of transmission lines outside priority habitats for sage-grouse. Relocating multi-million dollar linear facilities is cost-prohibitive. Further, doing so would require: local, state, and federal permits; the acquisition of new easements on private lands; and new NEPA compliance for facilities that have been in operation for decades. It is not clear that doing so would necessarily benefit grouse habitat. In fact, modification to existing lines that have been in use for decades would likely result in increased environmental impacts due to disturbance of habitats that have otherwise been reclaimed or restored.	All	Both	emc0378GB
29.	It would greatly benefit both land management and regulatory agencies and the electric utility industry if additional research could help determine effective buffer and seasonal restrictions for linear features that can protect sage-grouse and their breeding habitats, while facilitating reasonable and effective energy infrastructure planning.	All	Both	emc0378GB
30.	In addition, within PCW's study area, which has a number of distribution lines and kV and 230 kV power lines, over the course of our study we have not been able to detect any avoidance of power lines by greater sage-grouse. In fact, our data show frequent crossings of the power lines by greater sage-grouse.	All	Both	emc0399GB
31.	Second, NGP urges the agencies to implement the clear and long-repeated will of the people of the United States to support renewable energy, and the clear federal policies on renewable energy- and accommodate renewable energy installations and their related transmission lines on federal lands.	All	Both	emc0254GB
32.	More stringent mitigation should only be taken where there is a demonstrated lack of effectiveness. Every study of US power supply concludes that more transmission is badly needed. Burying power lines is costly in terms of money, increased surface disturbance, increased maintenance, and increased energy loss which requires more generation.	All	Both	emc0254GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	Power lines must be built. The mitigations recommended in this proposed action must address this reality.			
33.	Comments on "A Report on National Greater Sage-grouse Conservation Measures" (produced by the Sage-grouse National Technical Team, December 21, 2011). The following comments pertain to specific parts of the above-referenced document. Page 13, "Rights of Way" section, 3rd bullet. "Power lines effectively influence (direct physical area plus estimated area of effect due to predator movements) at least 39% of the sage-grouse range." While this paper is cited in the Conservation Strategy, another paper from the same book that found no effect of power lines on sage-grouse lek counts was not cited (see Johnson et al., pages 407-450 in Greater Sage-grouse: Ecology and Conservation of a Landscape Species and Its Habitats). The Conservation Strategy appears to select citations that support perceptions of negative impacts associated with power lines, yet does not include papers that do not support this view or that acknowledge the lack of data on the subject (e.g., UWIN literature review).	All	Both	emc0275GB
34.	Comments on "A Report on National Greater Sage-grouse Conservation Measures" (produced by the Sage-grouse National Technical Team, December 21, 2011). The following comments pertain to specific parts of the above-referenced document. Page 13, "Rights of Way" section, 3rd bullet. "Deaths resulting from collisions with power lines were an important source of mortality for sage-grouse in southeastern Idaho." This citation documented two sage-grouse collisions with power lines out of 56 collared birds; the sample size should be included when referencing this citation. As part of an Avian Protection Plan and with input from the U.S. Fish and Wildlife Service, PacifiCorp, an APLIC member, has conducted annual surveys of its power lines to assess avian electrocution and collision risks since 2001 and has surveyed over 100,000 power poles, much of which is within sage-grouse habitat. During these surveys, no sage-grouse collisions have been documented. Of 4,044 identified prey remains, sage-grouse comprised 0.05%. Considering the range of sage-grouse as a whole, collision with power lines is extremely low and conservation measures should reflect this.	All	Both	emc0275GB
35.	Comments on "A Report on National Greater Sage-grouse Conservation Measures" (produced by the Sage-grouse National Technical Team, December 21, 2011). The following comments pertain to specific parts of the above-referenced document. Page 64, last bullet. "Fit transmission towers with anti-perch devices." The paper cited with this recommendation (Lammers and Collopy 2007) found that avian predators were able to overcome perch discouragers, and that the deterrents "did not have the desired short-term effect on avian predators." Of the research conducted on perch discouragers (e.g., Lammers and Collopy, Prather and Messmer, HawkWatch International, and PacifiCorp), the effectiveness of discouragers is influenced by the line location, line configuration, proximity to other perch sites, and avian use of the area. PacifiCorp's avian risk assessment surveys (described above) have documented limited effectiveness, increased raven and raptor nesting rates, and increased electrocution risk associated with poles with perch discouragers. Because of the limited benefits of perch discouragers and the potential negative implications (electrocution "takes" of federally protected eagles and migratory birds; increased likelihood of ravens nesting), the potential risks and benefits of their use should be considered on a case-by-case basis rather than a blanket requirement for all power lines.	All	Both	emc0275GB

Table C-5.F
Comments Related to Transmission

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
36.	In November 2009, nine federal agencies signed a Memorandum of Understanding seeking to expedite the construction of new transmission lines on federal lands. If these transmission lines cross sage-grouse habitat, sage-grouse will likely be negatively impacted. The Gateway West Transmission Project, for example, will include ten power line segments and is expected to cut across 1,100 miles in southeastern Idaho and northern Wyoming, with approximately 500 miles of powerlines proposed on BLM lands. It is anticipated that this project may significantly impact sage-grouse habitat in those areas.	All	Both	emc0276GB
37.	Consider the impacts of power lines and poles that create perches for predators in sage grouse habitat.	All	Both	emc0305GB
38.	The BLM is using a "Framework for sage-grouse impacts analysis for interstate transmission lines 05-17-2011" in the Gateway Transmission line process. This states: An analysis of sage grouse populations within 18 km of the project is a critical component of an indirect impacts analysis for grouse. They may be impacted by loss habitat functionality. Yet the core model doesn't even prioritize habitats within 18 km. This also states that: the construction of a transmission project or other linear facility may pose an additional hindrance of seasonal migration patterns or avoidance of important seasonal habitats once used extensively by local sage grouse populations". It continues: "Qualitative and quantitative measures of habitat change must be considered in describing the potential impacts. In the context of managing a species that requires a large landscape of habitats to meet their life cycle needs, and the nature of the proposed disturbance, it is reasonable to make some assumptive predictions about the relative impacts within 18km".	All	Both	emc0411GB
39.	Sage grouse standards for wind and transmission lines Wind power generation represents a clean, renewable alternative to fossil fuels, but construction of wind farms in key habitats is likely to lead to unacceptable levels of impact. Although there is little published science directly addressing the impact of wind turbines or transmission lines on sage grouse, there is a broad consensus among biologists that sage grouse avoid tall structures (such as wind turbines and transmission towers) and abandon adjacent habitats. One unpublished study found that sage grouse habitat use increased with distance (up to 600 meters) from transmission lines. It is notable that modern perch inhibitors emplaced on transmission lines result in a major decrease, but not elimination, of raptor perching (Slater and Smith 2010). Molvar (2008) compiled BLM data from a wind power project on Cotterel Mountain, Idaho and was able to determine that the erection of seven meteorological towers led to drastic declines in sage grouse populations across nine sage grouse leks, while populations in the surrounding area remained stable. See Attachment 5. There has been abundant scientific information that other types of energy development, particularly oil and gas, has a major impact on sage grouse populations, and oil and gas development has some similar features such as habitat fragmentation and tall structures (in the form of drilling rigs).	All	Both	emc0343GB
40.	Wind and Transmission Inside Core Areas • No wind energy development • Transmission lines should be buried underground or limited to existing electrical transmission corridors of … mile maximum width.	All	Both	emc0343GB

Table C-5.F
Comments Related to Transmission

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	Outside Core Areas • Wind farms and transmission lines sited at least 5 miles from active sage grouse leks and at least 3 miles from identified winter habitats. • Transmission lines allowed along existing electrical transmission corridors of … mile maximum width.			
41.	At minimum, the NEPA analysis should address the following: • Excluding transmission lines from Core Areas, pursuant to the new BLM nationwide sage grouse IM.	All	Both	emc0343GB
42.	I urge you to consider concolidated plan amendments that will: limit new power lines, wind turbines and other tall structures in or near sage grouse priority habitat	All	Both	flg0000gb flg0000rm
43.	In the past few years we at White River Electric Association, Inc. have participated in the Piceance/Parachute/Roan Sage Grouse Local Working Group and recently attended the North Eagle/Southern Routt Greater Sage Grouse Working Group. White River Electric Association, Inc. is a member of the Avian Power Line Interaction Committee, and we are serious and conscientious in our efforts to construct and maintain power lines with the best interests of all parties involved.	CO	Both	emc0056RM
44.	We continually strive to work with the BLM, Forest Service, US Fish & Wildlife, and all regulatory agencies, yet at the same time we are obligated to insure that right-of-ways, access roads and structures be efficiently and effectively placed. As a non-profit, member-owned cooperative we are forced to closely look at the feasibility and logistics of placing and maintaining our facilities.	CO	Both	emc0056RM
45.	In reviewing the BLM's Greater Sage-Grouse Interim Management Policies and Procedures the first unrealistic suggestion that comes to mind is the burying of power lines. To my knowledge there is no science showing that grouse avoid the overhead structures; I have personally witnessed greater Sage Grouse leks below both transmission and distribution power lines. Often times the previously cleared (no blading, only brush beating) right-of-ways below the power lines enhance the habitat by removing the old growth sage and creating a more desired habitat. Transmission voltage power lines e.g. 69-kV and greater voltages, cannot be feasibly buried; buried high voltage power lines can be very dangerous, costs are extreme, and the life expectancy of such a buried line is less than half that of an overhead power line. And please consider that our distribution power Hnes only actually disturb a 2' circle of earth every 300 feet +/- ... only where the pole is set ... verses a trench and bladed right-of-way the entire length of the power line that must be reclaimed, reseeded, monitored and maintained. Yet another example of Greater Sage Grouse not being affected by overhead structures is the abundance of windmills in the habitat where the birds often congregate. As far as the thought that eagles and the other large predatory birds can use the structures as an unfair advantage when hunting a threatened or endangered species such as Greater Sage Grouse - there are now perching discourages designed, implemented and proven to reduce the perching of large predatory birds on such structures.	CO	Both	emc0056RM
46.	A second issue requiring additional research is the incidence of greater-sage-grouse collisions with power lines. To date, grouse collision risk with fences has been established. The Colorado Sage-Grouse Conservation plan indicates that sage-grouse collisions with power lines have been documented, but examples have been few, isolated, and anecdotal. Information to date infers no population-level impacts to grouse, but this has not been thoroughly studied	CO	Both	rmc0019RM

Table C-5.F
Comments Related to Transmission

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
47.	i. Lander, WY RMP Alternative B also requires anti-perching devices to be installed on all new overhead powerlines in greater sage-grouse, white-tailed prairie dog, mountain plover, and pygmy rabbit habitats to reduce predation from raptors. In addition, the BLM will work with ROW holders to identify conflict areas and get anti-perching devices installed on existing overhead powerlines in these same habitats. (DEIS 882) Because approximately 74-80% of sage-grouse females nest within 4 miles of leks (Moynahan 2004, Holloran and Anderson 2005), this measure may help to reduce predation pressures on nesting and foraging grouse. We recommend the use of deterrent devices on H-frame structures because recent research indicates they are effective tools in reducing perch use of such structures (Lammers and Collopy 2007, Slater and Smith 2010). The BLM and FS should consider not only anti-perching devices to reduce raptor predation on grouse, but also measures (not included in the Lander RMP) that would reduce conditions (e.g., nest substrates and anthropogenic attractants) that enhance local raven populations, to reduce potential raven predation on sage-grouse nests. Energy development in undeveloped sagebrush areas has been shown to facilitate increases in the abundance of breeding ravens, with concomitant negative effects on nest survival of sage-grouse (Bui et al. 2010, Coates and Delehanty 2010). Raven predation on grouse nests may have a significantly adverse impact on local grouse populations (Coates 2007). BLM and FS should recommend that any newly permitted permanent, highprofile structures will be outfitted with raven deterrents.	East	Both	emc0089RM
48.	iii. Strong components of Wyoming's approach For transmission lines, 2-mile wide transmission corridors have been identified in an effort to collocate disturbances. Construction is prohibited between March 15 and June 30 (or between December 1 and June 30 in winter concentration areas) and within 0.5 miles on either side of the existing transmission lines. If new lines are proposed for core area, they must be either buried or outfitted with raptor per deterrents to minimize avian predation pressure on sage-grouse.	East	Both	emc0089RM
49.	With specific regard renewable energy transmission and resource development, the proposed action must take into account the years of work done by: The Western Governors Association Regional Transmission Expansion Project, analysis of transmission requirements under a broad range of alternative energy futures and to develop long-term, interconnection-wide transmission expansion plans. More information may be found at http://www.westgov.org/rtep. These studies provide the basis for developing a balanced program of habitat management with energy development potential in terms of designated land use. All of these studies have been developed with a broad range of expertise and experience. State and federal agencies were contributing members along with utility, conservation and industry groups. All have extensive map products available for use and incorporation into the proposed action. All consider constraints of cultural, social, and biological issues among others. All have recommendations of primary renewable energy zones and necessary transmission corridors for delivery of energy. All of the studies are less than three years old and pertinent to the proposed action.	GB	Both	emc0254GB
50.	We respectfully request that structures, such as power lines, that are currently in use and which have long been in place under valid permits be "grandfathered in" or exempted from changes to greater sage-grouse management plans. We offer qualified support for mitigation measures which will demonstrably improve habitat or species success. The relative benefits of mitigation measures must be carefully balanced against the negative impacts which will occur during the installation of	GB	Both	rmc0056GB

Table C-5.F
Comments Related to Transmission

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	those measures. Marking and raptor perching prevention are far superior to the impacts of relocating or removing existing overhead power lines and to the impacts of converting to underground power lines.			
51.	In regard to new overhead, wood pole, transmission and distribution lines typically utilized by rural utilities to transmit power over the significant distances that must be covered, the RMP should recognize the limited impact of these projects on sage grouse habitat. Specifically, if such facilities can be routed near existing roads, new permanent ground disturbance is generally not required. In many locations overland ground construction techniques will not require grading and areas temporarily disturbed by vehicle tracks during construction return to their pre-construction condition within a very few years.	GB	Both	rmc0056GB
52.	The Dillion Local Working Group identified 5 key issues in the area: "tie" for 3rd, 3. i. infrastructure (includes fences, roads, power lines, communication towers, and pipelines, developed for any purpose)	IDMT	Both	rmc0028GB
53.	With specific regard renewable energy transmission and resource development, the proposed action must take into account the years of work done by: The California Renewable Energy Transmission Initiative (RETI) assessment all competitive renewable energy zones in California and in neighboring states that can provide significant electricity to California consumers by the year 2020. RETI also will identify those zones that can be developed in the most cost effective and environmentally benign manner and will prepare detailed transmission plans for those zones identified for development. More information can be found at http://www.energy.ca.gov/reti/index.html. These studies provide the basis for developing a balanced program of habitat management with energy development potential in terms of designated land use. All of these studies have been developed with a broad range of expertise and experience. State and federal agencies were contributing members along with utility, conservation and industry groups. All have extensive map products available for use and incorporation into the proposed action. All consider constraints of cultural, social, and biological issues among others. All have recommendations of primary renewable energy zones and necessary transmission corridors for delivery of energy. All of the studies are less than three years old and pertinent to the proposed action.	NVCA	Both	emc0254GB
54.	On page 13, second solid bullet, the report indicates that collisions with power lines "were an important source of mortality for sage-grouse in southeastern Idaho ..." The EIS should define "important" and compare this collision-caused mortality to annual hunting mortality. In Nevada, the Nevada Department of Wildlife claims that hunting is not an important mortality factor. The number of sage-grouse killed annually by each of these causes needs to be disclosed in the EIS.	NVCA	Both	emc0322GB
55.	Lands and Realty issues such as preservation of energy corridors for pipelines and overhead power lines must be addressed in the RMP amendments. Existing energy corridors and proposed Energy Gateway South and TransWest Express corridors should be recognized and considered for exclusion from sage grouse preliminary priority or preliminary general habitat designation.	UT	Both	emc0242GB
56.	i. Lander, WY RMP Alternative B also requires anti-perching devices to be installed on all new overhead powerlines in greater sage-grouse, white-tailed prairie dog, mountain plover, and pygmy rabbit habitats to reduce predation from raptors. In addition, the BLM will work with ROW holders to identify conflict areas and get anti-perching devices installed on existing overhead	WY	Both	emc0089RM

Table C-5.F
Comments Related to Transmission

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	powerlines in these same habitats. (DEIS 882) Because approximately 74-80% of sage-grouse females nest within 4 miles of leks (Moynahan 2004, Holloran and Anderson 2005), this measure may help to reduce predation pressures on nesting and foraging grouse. We recommend the use of deterrent devices on H-frame structures because recent research indicates they are effective tools in reducing perch use of such structures (Lammers and Collopy 2007, Slater and Smith 2010). The BLM and FS should consider not only anti-perching devices to reduce raptor predation on grouse, but also measures (not included in the Lander RMP) that would reduce conditions (e.g., nest substrates and anthropogenic attractants) that enhance local raven populations, to reduce potential raven predation on sage-grouse nests. Energy development in undeveloped sagebrush areas has been shown to facilitate increases in the abundance of breeding ravens, with concomitant negative effects on nest survival of sage-grouse (Bui et al. 2010, Coates and Delehanty 2010). Raven predation on grouse nests may have a significantly adverse impact on local grouse populations (Coates 2007). BLM and FS should recommend that any newly permitted permanent, highprofile structures will be outfitted with raven deterrents.			
57.	For powerline transmissions, and wind energy projects it might be advantageous to have the lowest wire on the transmission line or tip of the wind turbine be above a specific distance from the ground in core area habitat. Sage Grouse do not fly very high but a minimum could be set.	WY	Both	emc0050RM
58.	iii. Strong components of Wyoming's approach: For transmission lines, 2-mile wide transmission corridors have been identified in an effort to collocate disturbances. Construction is prohibited between March 15 and June 30 (or between December 1 and June 30 in winter concentration areas) and within 0.5 miles on either side of the existing transmission lines. If new lines are proposed for core area, they must be either buried or outfitted with raptor per deterrents to minimize avian predation pressure on sage-grouse.	WY	Both	emc0089RM
59.	BLM must implement policies to protect sage-grouse habitat on private split estate lands rather than permit BLM oil and gas drilling underlying important sagebrush habitat on private lands. BLM must also recognize that much of the sagebrush habitat that has been and is being eliminated and impacted in the Powder River Basin and Wyoming is from BLM permitted mineral development underlying private lands. BLM cannot simply ignore the impacts their permitting actions cause to millions of acres of sage grouse habitat by permitting mineral activity underlying millions of acres on private split estate surface that provides sage grouse habitat. BLM must implement measures to protect sage grouse habitat on all lands that they impact by their own permitting activity regarding BLM authorized mineral development. BLM must also restrict leasing of oil and gas and coal resources in high quality sage grouse habitat, regardless of surface ownership.	WY	Both	emc0129RM

Table C-5.G
Comments Related to Utilities

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	We respectfully request that structures- such as power lines, that are currently in use and which have long been in place under valid permits be "grandfathered in" or exempted from changes to greater sage-grouse management plans. We offer qualified support for mitigation measures which will demonstrably improve habitat or species success. The relative benefits of mitigation measures must be carefully balanced against the negative impacts which will occur during the installation of those measures. Marking and raptor perching prevention are far superior to the impacts of relocating or removing existing overhead power lines and to the impacts of converting to underground power lines.	All	Both	fxc0006GB
2.	in regard to new overhead. Wood pole, transmission and distribution lines typically utilized by rural utilities to transmit power over the significant distances that must be covered, the RMP should recognize the limited impact of these projects on sage grouse habitat. Specifically, if such facilities can be routed near existing roads, new permanent ground disturbance is generally not required. In many locations overland ground construction techniques will not require grading and areas temporarily disturbed by vehicle tracks during construction return to their preconstruction condition within a very few years.	All	Both	fxc0006GB
3.	Energy corridors do no good if they do not meet the requirements necessary to be viable for electrical providers. The DEIS and SEIS documents need to include planning requirements and a documented process for: 1) understanding electrical energy demands in areas where sage-grouse occur; and 2) evaluating utility corridors and ROWs for transmission line development in coordination with local utility owners, operators, state/local governments and municipalities.	All	Both	emc0378BG
4.	While the BLM's IM allows for the ongoing operation of existing facilities, it seems to place impediments in the way of access to those facilities. Problematic is the recommendation that additional mitigation might be required for existing access roads and/or previously authorized access ROWs that might not have been constructed or improved to-date, if this improvement would exceed the proposed three percent disturbance threshold. The ability of electricity providers to safely access/maintain existing electrical facilities is crucial to reliability of the Western grid.	All	Both	emc0378GB
5.	Some of the IM's recommendation may conflict with standards and federal regulations that utilities are required to meet. For example, BLM calls for co-locating power lines within existing ROWs. However, for operational and safety reasons, utilities may not be able co-locate facilities within existing ROWs. Utilities are required to maintain clearances identified in the National Electric Safety Code for the safe and reliable operation of the transmission system.	All	Both	emc0378GB
6.	Some of the "best practices" being suggested by the IM and NTT Report are unrealistic. For example, the documents suggest burying power lines as a mitigation tool. This is problematic from both economic and engineering perspectives. A number of factors influence the feasibility of burying power lines, including voltage, land use, terrain, soils and geology of the area, density of existing buried facilities (water gas, etc), highway crossings, surface water crossings, floodplains, and presence of other biological and cultural resources of concern. Burying high voltage transmission lines poses a significant operational issue for utilities and would substantially increase the cost of constructing high voltage transmission lines. (The cost of burying a high voltage transmission line can increase overall project cost anywhere from 4-10 times the comparable costs of an overhead line.) Other factors regarding the feasibility of building an underground transmission line include longevity, maintenance and operational issues and increased habitat fragmentation effects. Underground transmission lines have half the life expectancy of overhead transmission lines. There are also reliability concerns: when an outage occurs on an underground line, it is difficult to pinpoint and reach the source of the outage. Repairs take longer and require additional ground disturbance,	All	Both	emc0378GB

Table C-5.G
Comments Related to Utilities

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	potentially increasing disturbances to sensitive habitats. Above-ground facilities have been found to be generally compatible with the type of short brush that sage grouse uses for habitat. As a result, above-ground facility ROWs can actually help preserve such habitat. Finally, it is important to note: burying power lines actually carries a significant set of environmental degradation risks. We would point you to comments submitted from the Edison Electric Institute which speak to this issue. In particular, please consider the referenced study from the University of California, which provides a life cycle assessment of the potential environmental impacts of overhead vs. buried power lines.			
7.	We would point you to the work of the Avian Power Line Interaction Committee (APLIC). In partnership with the Utah Division of Wildlife Resources, Utah State University and a number of utilities, APLIC has supported efforts coordinated by Utah Wildlife in Need (UWIN) to assess sage-grouse and tall structures. These efforts include stakeholder workshops and a literature review to assess current knowledge and concerns and to develop research protocols to be used when assessing potential impacts. BLM needs to work with APLIC and other interested entities to get a better understanding of the construction and operational constraints involved.	All	Both	emc0378GB
8.	It would greatly benefit both land management and regulatory agencies and the electric utility industry if additional research could help determine effective buffer and seasonal restrictions for linear features that can protect sage-grouse and their breeding habitats, while facilitating reasonable and effective energy infrastructure planning.	All	Both	emc0378GB
9.	Western Area Power Administration (Western) has reviewed your letter and scoping document pertaining to planning efforts for the greater-sage grouse and its habitat on National Forest System lands included in the Routt National Forest near Yampa, Colorado. Western's HaydenGore. Tap 230-kilovolt (kV) transmission line is located near the identified core area in Township 2 North, Ranges 83 and 84 West while its Gore Tap-Hayden 138-kV transmission line is located on adjacent lands in Township 1 North, Range 83 West, 6th Principal Meridian, Routt County, Colorado (see the enclosed map). Both transmission lines are served by access roads that cross or about the core area. While there are no Western facilities lying on National Forest System lands within the core area identified by the Routt National Forest as "moderate priority" habitat, the proximity of Western' s transmission line towers and access roads used to operate and maintain the powerlines may be of concern to the Forest Service. Western asks that as your staff reviews the 1997 Revised Routt National Forest Land and Resource Management Plan to ensure the forest is implementing available regulatory mechanisms to protect the greater-sage grouse and its habitat, please keep in mind that valid, existing uses will conflict or interfere with or even prevent the establishment of viable sage grouse populations. Transmission line structures may provide a perch for raptors and powerline roads may provide access to areas during times of breeding and brood-rearing, or during times of migration or winter survival, but because the powerlines and roads exist already, they should be considered as part of the baseline.	All	Both	rmc0040RM
10.	If the Forest Service determines that an appropriate prescriptive standard to conserve greater sage grouse habitat is to close areas at certain times, then Western would request notification of such closure and would try to limit its activities to time periods when the area is open, except in the case of an emergency. If there is a power outage, Western will access the area, take care of the outage as quickly as possible then leave the area. If additional mitigation measures requiring changes or additions to the transmission towers are anticipated as part of this review, Western · asks that it be involved in the discussion prior to the issuance of any prescriptive guidance affecting its infrastructure.	All	Both	rmc0040RM

Table C-5.G
Comments Related to Utilities

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
11.	Right-of-ways. Issue: Utility corridors, including powerlines, pipelines and associated infrastructure, fragment habitat and affect sage-grouse populations. Potential geothermal and solar energy development on federal lands may also impact sage-grouse.	All	Both	emc0391GB
12.	Utility poles and wires have been known to pose a threat to sage-grouse since at least 1938, when evidence of grouse striking telephone wires was reported (Borell 1939). Utility corridors also fragment habitat and contribute to increased predation of sage-grouse locally by subsidizing raptors and corvids. The Oregon Department of Fish and Wildlife recently reviewed literature on the contributions of utility corridors to sage-grouse predation in the Sage-Grouse Conservation Assessment and Strategy for Oregon (Hagen 2011: 47-48, internal citations omitted). Perching on power poles and transmission structures increases a raptor or corvid's range of vision, allowing for greater speed and effectiveness in searching for and acquiring prey. Increased abundance of raptors and corvids within occupied sage-grouse habitats may result in predation rates outside the range of natural variation. Population level impacts to sage-grouse populations have been mixed. Transmission structures may also provide nesting sites for corvids and raptors in habitats with low vegetation and relatively flat terrain. Thus, these birds may preferentially seek out transmission structures in areas where natural perches and nesting sites are limited. Case Studies • Within one year of construction of a 372.5 mi transmission line in southern Idaho and Oregon, raptors and common ravens (Corvus corax) began nesting on the support structures, and within 10 years of construction 133 pairs of raptors and ravens were nesting on the transmission structures . • Raptor observations have remained stable over a 5 year period after construction of a power line in Nevada, but common ravens have increased >200%. • Golden eagle (Aquila chrysaetos) predation of sage-grouse increased from 26% to 73% (of the total predation) after a transmission line was constructed within 220 yd of an occupied lek in northeastern Utah. The lek was extirpated, and the presence of the transmission line resulted in changes in sage-grouse dispersal patterns and fragmentation of the habitat. • In Washington, 95% (19 of 20) of leks ≤4.7 miles from 500 kV transmission lines are now unoccupied, while the unoccupied rate for leks >4.7 miles is 59% (22 of 37 leks). • Leks within 0.25 miles of new power lines constructed for coalbed methane development in the Powder River Basin of Wyoming had significantly slower growth rates compared to leks further from these lines, which was presumed to be the result of increased raptor predation. • The presence of a power line may fragment sage-grouse habitats even if raptors are not present. Use of otherwise suitable habitat by sage-grouse near power lines increased as distance from the power line increased for up to 660 yards. The presence of power lines may limit sage-grouse use within 0.6 miles in otherwise suitable habitat.	All	Both	emc0391GB
13.	While electric lines are required to power oil and gas facilities, there seems to be confusion throughout the National Sage-Grouse Technical Team's report of what facilities apply where and acknowledgment that utility owners and operators may provide power to oil and gas providers, but in some cases oil and gas operators build their own power lines to interconnect to the larger transmission system. Tli-State requests the final guidance identifies recommended conservation measures according to fac ility type. Each applicant needs to understand the requirements for their respec tive fac ilities	CO	Both	rmc0019RM

Table C-5.G
Comments Related to Utilities

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	without hav ing to understand another industry's guidance.			
14.	SNWA respectfully requests that the EIS consider and discuss the following: the management guidelines for projects within utility corridors	NVCA	Both	rmc0069GB

Table C-5.H
Comments Related to Geothermal Energy Development

Comment No.	Comment	Sub RegionID	Agency	CmtLtrCode
1.	There are also spring and wet meadow brood rearing complexes that are likely to be impacted by geothermal development.	All	Both	emc0411GB
2.	The Middle Park population is the third largest in the state of Colorado after Northwest and North Park populations. These 3 populations account for 93% of the males counted in the state. Of the three largest populations, Middle Park is the only population that does not currently have any energy development activity. There are limited leases in Middle Park, but at this point most of the lease sales have been deferred until the completion of the BLM Kremmling Field Office Resource Management Plan. We strongly believe that protecting this population from oil and gas development should bc a priority in the effort to maintain or increase the population. Due to the absence of energy development activity in Middle Park, it is imperative to put in place strong protections for sage grouse that presents a unique opportunity to maintain and/or increase sage grouse abundance and distribution. Additionally leasing and development impacting the Middle Park population will destroy this unique unspoiled habitat.	CO	Both	emc0059RM
3.	The Middle Park population is the third largest in the state of Colorado after Northwest and North Park populations. These 3 populations account for 93% of the males counted in the state. Of the three largest populations, Middle Park is the only population that does not currently have any energy development activity. There are limited leases in Middle Park, but at this point most of the lease sales have been deferred until the completion of the BLM Kremmling Field Office Resource Management Plan. I strongly believe that protecting this population from oil and gas development should be a priority in the effort to maintain or increase the population. Due to the absence of energy development activity in Middle Park, it is imperative to put in place strong protections for sage grouse that presents a unique opportunity to maintain and/or increase sage grouse abundance and distribution. Additionally leasing and development impacting the Middle Park population will destroy this unique unspoiled habitat.	CO	Both	emc0064RM
4.	Of course, conserve the grouse and its habitat. Also consider the need for more oil production and out need for jobs for men and women	CO	Both	rmc0017RM
5.	A 2010 Instruction Memorandum (No. WY-2010- 012) recommends Wyoming BLM Field Offices identify areas not available for energy development (including oil, gas, and wind) and leasing, and defer leasing when a lease expires. This practice should be incorporated range-wide in all priority areas to prevent anthropogenic disturbance in sage-grouse habitat. Geothermal energy production is similar to wind energy, as well as oil and gas development, in terms of impacts. It requires surface exploration, exploratory drilling, field development, and plant construction and operation, and direct habitat loss can occur from well pads, structures, roads, pipelines, and transmission lines. Human presence during construction, development and operation of geothermal processes may cause additional impacts to sage-grouse. Currently there are no enforceable regulations to protect sage-grouse during geothermal activities. Rather, the BLM implements best management practices to minimize impacts to sage-grouse. These guidelines, however, are unenforceable and very general in nature. Looking to the future, standards and guidelines, as well as clearly enforceable requirements, must be delineated for geothermal energy production in sage grouse habitat. Given surface impacts from this form of energy extraction, exclusion of geothermal energy production should be strongly considered in priority sage grouse areas.	East	Both	emc0167RM

Table C-5.H
Comments Related to Geothermal Energy Development

Comment No.	Comment	Sub RegionID	Agency	CmtLtrCode
6.	As a primary stakeholder, however, we are fully aware of the fact our property is affected by a checkerboard land ownership pattern in which the Bureau has management jurisdiction for the public. It also lies within areas identified as supporting 75-100% breeding population densities of the species (2010). For these reasons, we would be opposed and are extremely concerned in supporting any objectives or conservation measures that would have a direct or indirect impact on our abilities to develop our private surface and sub-surface land and resources. Such conservation measures would include, but are not limited to, actions that could place restrictions on access, surface disturbing activity levels or hinder the ability to locate, explore and extract mineral resources.	NVCA	Both	rmc0053GB

Table C-5.1
Comments Related to Noise

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	CPW would like the PRMP to include the identification, description, analysis and proposed mitigation measures for noise disturbance to greater sage-grouse. In part, CPW requests that BLM/USFS develop noise abatement stipulations for compressor stations, pump jacks, diesel motors, etc that will be implemented range-wide for consistency.	All	Both	emc0072RM
2.	Another disturbance not specifically identified or addressed in existing or draft RMPs is the impact that natural gas flaring poses to greater sage-grouse. Flaring is believed to pose a threat from several standpoints. Noise associated with flaring may cause disturbance and increased predator effectiveness. Sound may directly interfere with lek display vocalizations and harmonics. Light from flaring can extend far beyond the immediate pad area, and this increased availability of light may provide increased opportunity for predation at times when natural light is normally not available. Light may also directly preclude grouse from using lek sites or other seasonal habitats.	All	Both	emc0072RM
3.	Noise from drilling and associated activities can drive sage-grouse from the area, can cause physiological stress, and moreover may interfere with auditory cues and communication between individual birds. If birds do stay in the area, the effects from noise would likely have negative impacts in terms of breeding and reproductive success	All	Both	emc0276GB
4.	Analyze the impacts of noise generated by oil and gas development, military aircraft, and vehicles on sage grouse, and their leks in particular.	All	Both	emc0305GB
5.	BLM states that disturbance from motion [and reflections?] of industrial energy or other structures is a concern. BLM proposes to "design or site permanent structures that create movement ..to minimize disturbance to grouse." What other activities besides fluid mineral on public lands result in "movement"? What about low level military overflights? Startle effects? This is often coupled with sudden onset of loud noises. Why is there no section of this report to address the very loud noises and visual impacts of military training activities that occur across vast areas of Idaho, Oregon, Nevada, Utah and portions of other western states - with flights down to 100 ft, AGL (above ground level).	All	BLM	emc0411GB
6.	Why not require noise shields at all times of the year, not just when drilling and during some periods? Why is BLM allowing drilling during nesting, and wintering periods for any reason? This means not just noise intrusion, but also flushing birds from human activity - thus making them more vulnerable to predation, and displacing them. Here is an example of where older land use plans are typically better than the newer ones - and amending them, for example, to put in place such a toothless noise provision would eliminate the more protective standard old LUP seasonal avoidance of intrusion into breeding and wintering habitats. We have frequently seen that wildlife protection language in some MFPs and older RMPs is actually stronger than the recent weak, ineffective RMP measures - which this NTT list largely parrots. Time after time, in energy development EAs (wind, transmission) BLM is using these laundry lists of uncertain BMPs to avoid stopping all disturbances during sensitive periods. The Forest's grazing EIS's overflow with similar loose, uncertain BMP lists.	All	BLM	emc0411GB
7.	We are concerned that the noise provisions are inadequate - especially since the type of noise (frequencies) being generated may be important. Plus, ambient noise is typically averaged in developer studies that we have seen. Species perception of noise differs greatly from humans. In calm air, generator noises, for example, can carry over vast distances. So can gas-line pump sounds - for example the Paiute gas pipeline crossing of the East Fork Owyhee that is audible over several miles.	All	BLM	emc0411GB

Table C-5.1
Comments Related to Noise

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
8.	At minimum, the NEPA analysis should address the following: • Assessing the impact of noise from drilling rigs, compressor stations, and other equipment on dispolaying sage grouse and emplacing measures to ensure that noise pollution is regulated below the appropriate decibel level to allow sage grouse to breed unhindered.	All	Both	emc0343GB
9.	While existing or draft RMPs in NW Colorado discuss a number of traditional sources of direct and indirect impacts of anthropogenic developments on greater sage-grouse, CPW has noticed a lack of information and discussion of how and when noise from oil and gas development impacts greater sage-grouse. There is a developing body of literature suggesting that limiting anthropogenic sources of noise is necessary to minimize human impacts on greater sage-grouse (as well as other grouse species in the family Tetraonidae). There are a number of mechanisms by which anthropogenic sources of noise can negatively impact grouse, including the following: • Industrial noise masks the sounds of strutting males and may disrupt female choice of males on the lek (leading to reduced productivity)and cause females (and consequently males) to abandon leks; • Industrial noise masks sounds made by approaching predators and may lead to increased predation and reduced survival for all age and sex classes in all seasonal habitats, not just at leks. Over time, this may result in reduced survival of birds inhabiting areas near noise sources and ultimately, fewer birds in developed areas. Sage-grouse may also avoid areas with industrial noise, which would result in the same pattern; • Industrial noise in brood-rearing habitats may mask the predator-warning vocalizations given by females to chicks or the contact calls of lost chicks, either of which could lead to reduced brood survival; • Sage-grouse of all age and sex classes in all seasonal habitats may respond to increased ambient noise by increasing time spent being vigilant, thereby increasing energetic costs and decreasing time available for foraging and self-maintenance, leading to poorer body condition and reduced productivity; and • Industrial noise could cause chronic physiological stress that leads to poorer body condition and reduced survival or productivity	CO	Both	emc0072RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	The conservation measures you propose will drive many true rangeland stewards off the land and will severely impact other businesses within the western economy. Careful review of the NOI and relevant associated documents reveals that the US Fish and Wildlife Service's own analysis demonstrates that the greater sage-grouse is not legally qualified for listing under the Endangered Species Act. Yet the BLM has proposed and implemented under their December 2011 Instruction Memorandums Endangered Species Act styled sage-grouse conservation measures under the misguided notion that the Act somehow authorizes or even mandates ecosystem conservation prior to a species listing. These unnecessary and legally unsupportable decisions to impose and enforce sage-grouse conservation measures under the auspices of the Endangered Species Act when the greater sage-grouse does not currently meet the listing requirements of the Act have and will negatively impact most economic activities across the species range by increasing the regulatory cost and burden to conduct natural resource related activities, both commercial and recreational, thereby significantly impeding or virtually eliminating such activities.	All	Both	0398GB
2.	Consider having sage-grouse conservation on equal footing with livestock grazing on private allotments. We wish to not lose our grazing allotment if we designate it as sage-grouse conseration habitat.	All	Both	cfc0001
3.	Proper "Savory" like grazing is the answer. Simple statistical correlation proves this.	All	Both	cfc0002GB
4.	Couple this with grazing cuts and increased fires since 1980 and there you have simple statistical analysis of the 3 reasons for sage-grouse decline.	All	Both	cfc0002GB
5.	I'm not advocating past grazing practices, I'm advocating more grazing animal for less time. Yes this means ranchers who turn their livestock out forget about them will have to change or go away. We need to have flexibility within grazing permits to hit invasive species hard then move on.	All	Both	cfc0002GB
6.	You should set aside an area where predators can be retaced and creative grazing system can be developed that will be more intense in some key areas.	All	Both	cfc0006GB
7.	There is little emphasis on treating and restoring range-land to bring it back to its full productive potential for sage grouse and all wildlife and livestock. There should be no retirement of Grazing Priveleges to achieve this.	All	Both	cfc0006RM
8.	There are research projects under way that are documenting that grazing by livestock is done under conditions that are appropriate for that specific areas needs, the outcome is nutral to positive as far as maintain, manipulating as desired, or improving habitat for grouse in general and even sage-grouse in specific. Any analysis would be incomplete withut a through update and incorporation of recent research on grazing's effects and potential benefit in improving habitat needs.	All	Both	cfc0010GB
9.	The causes are many and varied. When sheep were prevalent poisons were used widely to eradicate any meat eating animals. Sheep were also herded and not allowed season long access to individual grazing areas. Ephemeral draws were generally in better condition with that mgt.	All	Both	cfc0011RM
10.	To prevent listing of Sage-grouse livestock grazing and vegetative management projects and programs must be modified to provide sufficient quality Sage-grouse habitat.	All	Both	cfc0016GB
11.	The NTC recommendation "consider retirement of grazing priviledges in priority sage grouse habitat areas" is a concern. I believe this will give radical environmental groups a tool to contest BLM and Forest Service allotment renewals. I would encourage you to use "deferment" rather than retirement.	All	Both	cfc0017RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
12.	National Tech Recommendation of retiring grazing permits would be very counter- productive from many standpoints. Most importantly from the s. grouse perspective- there would be many more fires that would wipe out sagebrush -Duh!	All	Both	cfc0018RM
13.	I would like to see documentation and numbers on sage grouse dying from crashing into fences. They may be stupid, but they aren't that dumb. I have travelled thousands of miles down fence lines and have never seen a dead grouse by a fence, and neither has any of the dozens of permittees I've talked to.	All	Both	cfc0018RM
14.	I am especially concerned that a "hard look" is taken at livestock grazing, its affects on the environment, its affects on sage grouse.	All	Both	cfc0020GB
15.	The grazing has help with the habit for the chickens. They're thriving on the range.	All	Both	cfc0024GB
16.	Grazing restrictions should be limited to non-native species.	All	Both	cfc0024RM
17.	Retirement of grazing privileges is not in the interest of securing the nation's food supply.	All	Both	cfc0024RM
18.	If grazing privileges are retired, how will the agencies manage the health of the rangeland? It is common knowledge that semi-arid environments need grazing to keep the plants healthy. This is essential for the sage grouse that depend of these plants.	All	Both	cfc0024RM
19.	Livestock Grazing. #1 - good. #3 Within much of TBNG, wetlands are often temporary and seasonal due to precipitation. Encourage pasture rotation or defered grazing, perhaps with compensation. Possible temporary electric fencing. Case by case.	All	Both	cfc0025RM
20.	Livestock Grazing- Disturbance- 4 miles radius of a lek means 14 square miles of land or more. That is way too much to expect anyone to give up use on. 2 miles seems to be fairly standard and is still a large area.	All	Both	cfc0025RM
21.	3% disturbance is a lot, especially considering the past 14 years. 10% would be more realistic. No more than 1 disturbance per section is not realistic either due to changing landscapes. There should be mitigation allowances made. Erusting used roads and large/medium reservoirs should not be counted.	All	Both	cfc0025RM
22.	"Remove, modify or mark fences." You might be able to put something on posts to keep hawks from searching but would a "flag" waving from the wires be a disturbance also? I don't know if sage grouse go under a fence for protection but we have seen rabbits do so.	All	Both	cfc0025RM
23.	"Retirement of grazing priviledges in priority sage grouse area." NO! May use deferred/rotational grazing. Sage grouse at their most plentiful were co-existing with large grazing animals. You would still have antelope, deer and elk in some places. Fox, Swift fox, skunks and badgers are likely more destructive than cattle or sheep.	All	Both	cfc0025RM
24.	"All Activities" #1 NTR Ranches may have to do some activities during this time. They can use care not to disturb birds- no dogs, little noise, especially when birds are on nest or before chicks leave nest. #5 same as above	All	Both	cfc0025RM
25.	Don't blame lwisted (SP) and grazing for sage hen loss.	All	Both	cfc0026GB
26.	This has the potential to be the distruction of the western public land based livestock industry	All	Both	cfc0030GB
27.	Malheur County has added vector control bringing attending to the issue of west nile virus. The virus is known to affect horses, sage grouse, and humans which leads me to conclude that blaming the livestock industry for sage grouse issues is unfounded scientifically and if taken to the extreme will result in economic and ecosystem damage.	All	Both	cfc0030GB

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
28.	Where I have personally senn sagehens in a lek was an area containing several fences and grazed by cattle. This is one of the few areas that sage grouse population is stable.	All	Both	cfc0031GB
29.	The fact that we have Sage Grouse here that have co-existed with the livesstock operation for over 100 years should be proof that they are not in danger from livestock use, and grazing, waster development and control of predators actually enhance the benefits to grouse. The water we develop for livestock is very important to the birds and will not be there if cattle are removed.	All	Both	cfc0032RM
30.	More research on sagebrush manipulation and proper grazing and timing of grazing needed.	All	Both	cfc0044GB
31.	Science- proves there was fewer acres burned in Nevada in 1950-1970 why? The obvious answer, livestock grazed the fire fuel off. Yes, there is a balance.	All	Both	cfc0046GB
32.	Use cows to improve the forage for birds and wildlife and to prevent wildfires.	All	Both	cfc0047GB
33.	Since wildfire is the#1 threat to sage-grouse and their habitat -Please include grazing with cattle and sheep in the strategy plan to help reduce the fire threat.	All	Both	cfc0050GB
34.	I think if the Sage-grouse is listed there will be unintended consequences - you will lose the cooperation of the range users and the other people that use the range if there are too many regulations.	All	Both	cfc0053GB
35.	It has become very obvious to us that as cattle numbers and utilization levels have declined sage hen population have gone down.	All	Both	cfc0056GB
36.	The benefits of a well managed grazing system are advantagous to healthy sagehen population. The sage-grouse we observe like to follow the sows in a pasture and eat the tender plant growth after livestock grazing.	All	Both	cfc0056GB
37.	I do not believe that grazing has any negative impact on the sage-grouse population. I believe the data available also supports that.	All	Both	cfc0059GB
38.	WE have watched the sage-grouse poulation fluctuate up and down and it does not appear to be tied to cattle grazing in any way.	All	Both	cfc0060GB
39.	The facts handed out at the meeting are not correct. Our local sage-grouse work group has been studying science about 95. They show grazing has helped the grouse habitat.	All	Both	cfc0062GB
40.	Basically from years of living in the Great Basin and from the BLM map display I think one salient problem is that so much critical Sage-grouse habitat is also designated as grazing allotment	All	Both	cfc0066GB
41.	Over the years (1870-present) over grazing, riparian abuse, invasive species, climate change, wild fires regarded as a "business opportunity"/cowboy lightening have altered the habitat in favor of public welfare ranching vs. native species, plant + animal. Crested wheat monoculture is not a diverse biological ecosystem.	All	Both	cfc0066GB
42.	My comments are regarding the use of BLM ground for the grazing of cattle. I think that cattle and sage-grouse have a symbiotic relationship. Both species benefit from each other. Some benefits that cattle offer to sage-grouse is 1) The water tanks supply water for the birds 2) Cattle graze down fire hazerdous grass 3) Cows don't bother birds in nature & cows feed people before cattle are kicked off the BLM, I feel that there are bigger threats to sage-grouse that should be addressed first.	All	Both	cfc0068GB

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
43.	First of all, since fire is the #1 destroyer of sage-grouse habitat, I think that we should figure how to prevent desert fires. One of the best ways to prevent fires would actually be to more intensively graze the forage with sheep and cattle. The BLM has so many regulations on the grazers that don't allow the livestock to be on the grass long enough to take it down to a less fire hazardous length. Better management of the land could do a lot to prevent fires. Also I have heard that BLM workers actually go start fires on the desert. That is rediculous!	All	Both	cfc0068GB
44.	My comments are going to be directed towards sage-grouse and cattle grazing co-habitation. I feel that they co-habitation. I feel that they co-habitat very well, and if cattle are not allowed to graze on BLM land, there will be an increase in fires due to the amount of dry grass which fuel huge fires.	All	Both	cfc0069GB
45.	I hope you will consider and take into account that if cattle grazing is regulated or restricted, this will have a huge impact on many rancher's lives and livelihoods. It could mean that ranchers that graze on public land would be forced out of business. That would be a sad event.	All	Both	cfc0069GB
46.	While I know that wildfire, weeds, fencing, etc have an affect on the sage-grouse, I feel that the each of the Forest Service & BLM to monitor grazing over the many years has lead to decrease in habitat for beautiful birds.	All	Both	cfc0072GB
47.	Sound scientific research indicates that grazing is beneficial to the greater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires. (Launchbaugh et al.2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et a1.l994, Evans 1996). It has also been used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994).	All	Both	em0396GB
48.	Just a quick note to say that I hope the new guidelines continue to allow for livestock grazing of these native grasslands. This ecosystem evolved with grazing by large herbivores and needs grazing to continue to function properly. That said, I'm sure improvements can be made regarding timing, season-of-use, and stock densities to improve habitat conditions relative to ground-nesting birds.	All	Both	emc0010RM
49.	2) End livestock grazing on Federal Lands. Grazing destroys the sage brush habitat needed by the grouse to feed and nest. Cattle and other livestock destroy the natural vegetation and open areas to invasive species.	All	Both	emc0011GB
50.	I'd like to comment on the sage grouse strategy. I understand that during the 60's there were a great number of sage grouse in southwest montana. During this time period there was an active predator control going on. Sheep were being grazed in largenumbers. Also at this time, eagles, facons, hawks and the like were not protected and the no.s were down due to DDT. Cattle grazing was having a greater impact on the vegetation. Also in the 60's, large areas were sprayed to kill sagebrush and make more grass. I have dates of spraying but can't find dates and data of sage no.s for that time frame or after. I would like to see a comparison of no. of sage grouse before, during and after spraying to see if reduction in sagebrush had an effect on sage grouse no.s. Since then, grazing by sheep and cattle has been reduced. Making better riparian and vegetation overall. Some burning of sagebrush was done in the 80's but since that time, sagebrush treatment has been reduce greatly. So no change in sagebrush quality! Predator control has been reduced and the eagles, falcons, hawks, etc have been protected and increased.	All	Both	emc0013GB
51.	Despite anti-livestock bias, some people have recognized cattle grazing's importance to certain species. Because sage grouse currently thrive in an area with a long history of grazing, the BLM should make every effort to understand the ways in which the cattle are important to the birds.	All	BLM	emc0013RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
52.	The RMP should take a hard look at places where cattle have been removed to see what impact this has had on the sage grouse. Grazing clears areas the grouse can use as leks. Stock ponds provide water. Disturbance encourages growth that can provide nesting cover the following spring.	All	Both	emc0013RM
53.	Humans have biases. Even well-meaning, scientific, logical people have biases that they do not recognize. To give the sage grouse a fair chance, it is important to realize that most ecologists have been educated with an anti-livestock bias. To overcome this bias, it is necessary to actively look hard for ways in which cattle might be benefiting the sage grouse. The alternative is to remove cattle, drive ranches out of business, and then blame the resulting decline of the grouse on something else. This might be good politics, but it is bad for the grouse.	All	Both	emc0013RM
54.	The presence of a ranching community using BLM allotments increases the chances of catching a wildfire when it starts, which reduces the amount of big sage brush habitat lost. If economic and political forces undermine this community, they also undermine grouse habitat.	All	Both	emc0013RM
55.	People who ride the range moving cattle or fixing fence have more opportunity to find noxious weed infestations, which reduces the amount of sage grouse habitat lost to non-native invasive plants. If economic and political forces remove riders from an allotment, the habitat becomes less resistant to invasive plants.	All	Both	emc0013RM
56.	Sage grouse leks benefit from livestock disturbance. If economic and political factors force the ranch to sell out to absentee landowners, the lek could be lost.	All	Both	emc0013RM
57.	Much of sage grouse habitat is on private land. If economic and political factors encourage the ranch to try farming, this habitat will be lost to the plow.	All	Both	emc0013RM
58.	The RMP needs to acknowledge that the economic benefits of the partnership between ranches and the BLM are also ecological benefits for sage grouse.	All	BLM	emc0013RM
59.	Each proposed conservation measure in the EIS should be analyzed in terms of how much it costs and how much the grouse population will benefit. The following conservations measures should be included in this analysis: - Various methods of coyote control. - Various methods of raptor control. - Various methods to reduce danger from fences. - Various methods to reduce danger from vehicle traffic. - Various methods to protect grouse from disease. - Various methods to limit exposure to pesticides. Each method should be rated according to two measures: 1. Number of grouse saved per dollar spent on materials and labor. 2. Number of grouse saved per laborer-hour of time spent. When considering these measures, the EIS should analyze costs from three different viewpoints: 1. When the BLM employs the person doing the labor; 2. When the BLM contracts with a third party to do the labor; 3. When the BLM encourages ranchers or other partners to perform the labor. Ranchers' time and BLM funds are limited.	All	Both	emc0013RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	The RMP should focus on conservation measures that provide the highest return for the time and money invested.			
60.	The EIS should study the impact that pesticides might be having on sage grouse in regions where the grouse are not doing as well as they are in northeast Montana. The RMP should acknowledge that keeping private land owners in the cattle business is preferable to forcing them to try crop-raising methods that might rely on chemicals harmful to sage grouse.	All	Both	emc0013RM
61.	Whenever the RMP considers a course of action that could reduce the economic viability of a ranch, it should also consider whether that course of action would harm sage grouse by increasing the likelihood that the ranch would plow prairie, overgraze, or sell land to developers to compensate for the lost revenue.	All	Both	emc0013RM
62.	Because big sage brush can be permanently destroyed by fire, any change in grazing should take into account the increased risk of fire.	All	Both	emc0013RM
63.	The EIS should estimate how much the coyote population would increase and how much the sage grouse population would decrease if the ranches were not putting pressure on the coyote population.	All	Both	emc0013RM
64.	The EIS should identify the ways in which sage grouse benefit from cattle on the range. If this identification cannot be accomplished during the planning process, grazing plans should not be altered until the benefits of cattle are understood.	All	Both	emc0013RM
65.	-The EIS should identify ranches where the sage grouse are doing well. Grazing plans on these ranches should not be altered. - The EIS should identify ranches without sage grouse that could be grouse habitat. Grazing plans on these ranches should be changed to make them more like the ranches where grouse thrive.	All	Both	emc0013RM
66.	In areas where sage grouse currently thrive, the RMP should make no changes to current grazing, road use, and fire-suppression practices.	All	Both	emc0013RM
67.	The RMP should explore ways to keep ranches grazing the land instead of farming it.	All	Both	emc0013RM
68.	The EIS needs to acknowledge that the economic benefits of the partnership between ranches and the BLM lead to ecological benefits for sage grouse. The RMP should protect the economics of this relationship.	All	BLM	emc0013RM
69.	I am a rancher in north cental Mt. We live on the milk river and run cattle on red rock creek, as well as Lodge creek, and up by the Canadian border. Working together with the State, BLM, and our local conservation district we currently have the healthiest, most diverse grassland ecosystem in the world. Our sage grouse numbers are very plentiful. We are currently in a position where we are able to through the Montana Department of Fish, Wildlife & Parks translocate some of our birds to Canada. As a fourth generation rancher on the same homestead, we are facing many hardships keeping the ranching industry up and running. I encourage you to look into what has worked well for so many years and maybe model other areas after us. Please do not upset the apple cart by trying to change our way of operation that has and is working so well.	All	Both	emc0014RM
70.	In a recent book edited by S. T. Knick and J. W Conmelly on Sage-Grouse research it was stated that most attempts to restore sagebrush habitats have been unsuccessful. In fact a noted grouse expert, Dr. Clait E. Braun, stated, "I know of no areas where Sage-Grouse have re-established their distribution over significant areas of former habitat," (The Wilson Journal of Ornithology, Vol. 123, p 655). What this effort will require will be for you to put Sage-Grouse management above all other uses on public lands. This means that grazing of livestock and fences should be eliminated in core	All	Both	emc0021RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	Sage-Grouse areas. All types of land fragmentation, such as roads, power lines, wind farms, oil and gas drilling, etc. will have to be secondary to the management of Sage-Grouse. I do not have much faith that your agencies will be capable of such a drastic turn-around. In fact, BLM planned to study ecological trends in much of the 260 million acre of the West's grazing allotments, but told the scientists not to consider livestock grazing, due to "anxiety from stakeholders." Such attitudes will absolutely have to change if there is any hope to save Sage-Grouse and their habitat. The only real solution that I see is buying out willing ranchers who graze in core Sage-Grouse areas. As said, both your agencies will have to put the grouse first.			
71.	The Multiple Use Sustained Act Yield Act requires BLM to manage its lands for "multiple uses," including livestock grazing and oil/gas exploration and recovery. Resource Management Plans (RMP) should recognize that sage grouse management can be compatible with livestock grazing and oil development. Furthermore, normal activities of multiple uses should be allowed to continue until the plan revisions have been made. No activities, such as livestock grazing, should be stopped in the interim. Any change in use should follow existing legal procedures for changing such use.	All	BLM	emc0024RM
72.	While sage-grouse conservation may be a consideration in managed livestock grazing, it should not be the overriding consideration. Sage-grouse should be one management consideration for grazing management, but not the primary one. The same is true for range improvements. Sage-grouse may be considered in making range improvements, but it should not be the overriding consideration.	All	Both	emc0024RM
73.	Radio news tells me that policies removing cattle grazing have resulted in the destruction by fire of over 75% of the sagegrouse habitat in states to the west of us. The judge responsible for trying to protect sagegrouse by removing grazing has decided some grazing may be necessary, but it is a little late. Big sage can take more than 100 years to recover from fire. Do not make that mistake!	All	Both	emc0028RM
74.	Historically, sagegrouse numbers were greater in this area during and after a period of extreme overgrazing. At that time, the federal government actively poisoned and paid bounties for furred predators. Winged predators were shot by homesteaders to protect their chickens. Sage-grouse took advantage of lower predation as did jackrabbits. In 1926, the Opheim paper published jackrabbit poisoning advice. In 1936, 12,500 rabbits were reported killed near Opheim	All	Both	emc0028RM
75.	It is possible the overgrazing may have helped the sagegrouse by protecting big sage from fire. It certainly did not seem to depress sagegrouse numbers. This overgrazing due to roving graziers of "free grass" was the main reason the Taylor Grazing Act was enacted. Next, the BLM was formed and has worked with established ranchers to create the conditions we have today. It is a success story that should not be ignored. Do not repeat the mistakes made in surrounding states and destroy sage grouse habitat.	All	Both	emc0028RM
76.	In the 1960' s, I owned the hay meadows that ran near the B.L.M. foothills. Then these foothills were totally overgrazed. My hay meadow would green-up after haying. About five o' clock, bunches of sage hen would fly from the foothills onto my meadow. We had marvelous hunting! Today, the foothills are only slightly grazed in comparison, the meadow is still green, but no sage hens. Why? In my humble opinion, the culprit may be the crow. 40 years ago, one would see a crown occasionally. Today, there are crows everywhere. Bunches of fifty crows are common.	All	Both	emc0029GB
77.	Curiously, grass may be a limiting factor to the sage grouse numbers. Sagebrush habitat is the ecological home of the greater sage grouse. So it is interesting to note, lands with an abundance of grass tend to have less sagebrush. Plus, grass encourages large wild land fires which are devastating to sage grouse habitat. We have read stories and seen pictures oflarge numbers of	All	Both	emc0029GB

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	sage grouse in the early 1900' s. Then, large numbers of livestock also grazed these federal lands. Grass was not in abundance then, as it is now. So .. . Why have sage grouse numbers declined? The axiom-more cows… more sage grouse-less cows...less sage grouse; may have merit.			
78.	... "the world population is seven billion and growing. Global agriculture production needs to continue growing at a significant pace to keep up with demand." so states the 2011 Global Agricultural Report. The report states that we need to double agriculture output in the next forty years. What does this mean to federal and state agencies managing our state and federal lands? The mind-set of limiting livestock grazing on federal lands need to be reviewed. Pressure will mount to harvest as much protein as possible. We need to do our share feeding the people of our world!	All	Both	emc0029GB
79.	I would like to comment on the sage grouse. The decline of the sage grouse in Nevada is a combination of problems. First the removal of the beef cow off the range. Cows are fire suppression they also eat grasses leaving room for sage to grow.	All	Both	emc0031GB
80.	2. Encourage the use of riparian areas by livestock. Sage grouse prefer riparian areas that have been grazed to those that haven't. The sage grouse have more succulent grass they prefer, the chicks find bugs easier, and predators are less likely to be able to sneak up on them.	All	Both	emc0032GB
81.	Encourage livestock grazing to keep the range from being burned out due to the build up of fire fuels.	All	Both	emc0032GB
82.	The petition for listing the Greater Sage Grouse as an endangered species specifically targets two important western industries in particular. The energy industry, and the agricultural industry. Both of these industries are vitally important to the economy of our western states and vitally important to our small local economies as well. This fact cannot be emphasized enough. While both of these industries bear responsibility to manage their operations to provide for conservation of natural resources, we maintain that these industries have demonstrated that they are doing so. The regulatory environment in which these industries exist must retain flexibility in order for these industries to survive. The regulatory environment must also allow industry leaders and federal agencies the flexibility to develop adaptive management strategies to achieve the appropriate balance between the increasing demand for resources and conservation objectives.	All	Both	emc0032RM
83.	The petition for listing clearly blames the livestock industry as the primary cause of all ecological issues surrounding the Sage Grouse. Past grazing practice may have not been optimal for conservation, nor for profitable livestock production, however modern livestock management embraces a scientific understanding of how grazing modifies the environment it occurs in and that knowledge is applied to an adaptive management strategy. Properly managed, grazing poses no significant threat to Sage Grouse habitat. In contrast when grazing is used as a management tool along with vegetation management, it can be effectively used to improve sagebrush habitat and livestock forage alike.	All	Both	emc0032RM
84.	Ironically, Sage Grouse numbers were highest during the 1920's and 1930's when livestock stocking rates were also at their highest numbers. Part of the reason Sage Grouse were doing well at the time, despite very intensive grazing, is that predators were kept in check. Today we have very little predator control. In fact in Colorado leg hold traps are illegal, and predator hunting is at an all time low. Predator control must be a part of any recovery plan.	All	Both	emc0032RM
85.	West Nile virus, which is linked to standing water associated with some forms of energy development and agricultural water use, also poses a threat to greater sage-grouse in the Eastern Region. Naugle et al. (2004) showed that up to 25% of a	All	Both	emc0034RM

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	population may die due to West Nile virus. The BLM produced an Information Bulletin (MT-2011-033) regarding best management practices to reduce the availability of breeding grounds for mosquitoes that carry West Nile virus. We recommend that these best management practices be implemented across BLM lands and particularly in sage-grouse core areas to prevent the death of this species. WWF has also produced, along with partners at the University of Wyoming, a spatially explicit map showing where West Nile virus is most likely to become prevalent under climate change conditions (Schrag et al. 2011). Areas with a high threat of West Nile virus (areas coded in yellow, orange and red in the figure below) that are located within core areas should be prioritized for reduction of standing water and other factors that increase the likelihood of becoming Culex mosquito breeding grounds. *Included an attachment (Figure 4)			
86.	In addition to energy development and disease, sagebrush-steppe habitat quality may be impacted by grazing practices, invasive species and resulting changes in the frequency and severity of fires.	All	Both	emc0034RM
87.	The Y-3 II Ranch (the "Ranch") headquartered just south of Jackpot, Nevada has fee ground and grazing allotments adjacent to each other in southern Idaho (the allotments are within the BLM areas served by both the Jarbidge and Burley Field Offices) and northern Nevada (the allotments are within the BLM area served by the Elko Field Office). Therefore, the Ranch falls within both the Nevada/ NE California and the Idaho/ SW Montana subregions. Cattle are constantly moved between these pastures and allotments in Idaho and Nevada during the grazing season. One of our concerns is the consistency among the RMP's that will be adopted for these land use planning areas. In other words, we don't want to be subject to significantly different rules and regulations simply because our cattle have crossed the Idaho/Nevada border. Please take situations of this sort into consideration when addressing proposed Records of Decision and RMP Amendments for sage-grouse within both the Nevada/ NE California and the Idaho/SW Montana sub-regions.	All	Both	emc0041GB
88.	How does livestock grazing, at various levels and at various timing configurations, influence: 1) vegetative structure and its effectiveness as sage grouse hiding cover from predators, 2) vegetative composition, especially in brood rearing areas (riparian), and the resulting impact on the abundance/ availability of insects to young grouse, 3) vegetative structure as it may affect the distribution and behavior of aerial and ground predators…And their consequent predatory efficiency in taking sage grouse.	All	Both	emc0043RM
89.	Public lands are for public use, and that means public lands must be managed for multiple use. I am definitely in favor of conservation measures for sage-grouse such as managing for sagebrush, water developments to improve habitat, proper planned grazing, etc. However, we must be careful to not manage the public lands for one species or one purpose. For example, to eliminate livestock grazing in favor of sage-grouse conservation would not only be a bad biological decision (i.e. poor plant health, increased fire risk, etc); it would also go against the basic theory of multiple use.	All	Both	emc0052RM
90.	The sage grouse population is NOT impacted by grazing, current roads, or energy factors. (I never saw a cow kill a grouse).	All	Both	emc0054GB
91.	US Fish and Wildlife has identified grazing as one of the threats to sage grouse. However, very little research has been done to identify those threats, or to look at possible benefits that livestock grazing might have on sage grouse and sage grouse habitat. Even Connelly, et al., (2000) admitted, "There is little direct experimental evidence linking grazing practices to sage	All	Both	emc0054GB

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	grouse population levels."			
92.	Livestock grazing may be the most compatible human activity in sage grouse habitat. Evidence for this can be inferred from the fact that livestock grazing is the primary human activity in the habitats of the only three populations of greater sage grouse in Utah that are considered sufficiently healthy to be hunted by the Utah Division of Wildlife Resources. These are Parker Mountain, Rich County and Diamond Mountain. Habitats, e.g., Strawberry Valley, where grazing has been largely curtailed for years and which have become primarily used for recreation no longer support huntable populations.	All	Both	emc0054GB
93.	My concern is that if grazing is restricted unreasonably on BLM or Forest Service lands then grazing permittees and private landowners may sell out to recreational users whose activities may be more detrimental to sage grouse than grazing.	All	Both	emc0054GB
94.	I'm also concerned that grazing practices may be prescribed that may do more harm than good. For example, some think that intensively managed grazing may be less of a threat than large pastures where cattle graze for longer times. But if additional fencing is required to accomplish the grazing management objectives, the negative effect of fencing could more than offset any positive effect of increased grazing management. The point is that there is a lot of interaction between factors and we don't know very well how various practices will impact sage grouse. Therefore, much caution should be applied to making changes to current grazing practices where the healthiest populations of sage grouse now exist.	All	Both	emc0054GB
95.	I agree with the NTT document that with best management practices, the grazing of livestock has little to no effect on sage-grouse, and could actually improve the habitat. As the NTT document states, "proper livestock management can assist in meeting sage-grouse habitat objectives and reduce fuels".	All	Both	emc0064RM
96.	Livestock grazing can degrade habitat, rendering it unsuitable for Greater Sage-grouse. We therefore advocate consistent management standards throughout the Greater Sage-grouse's range, based on the best available science and following the recommendations of the National Technical Team.	All	Both	emc0068GB
97.	We advocate the creation of sagebrush reserves, preserving the best remaining habitat, and a voluntary program for ranchers to turn in their grazing permits in exchange for compensation paid for by conservation groups.	All	Both	emc0068GB
98.	This scoping exercise has been brought about by litigious extremists that want to remove livestock grazing from the public lands of the West and are using the declining numbers of sage-grouse as their weapon via the ESA.	All	Both	emc0070GB
99.	Wildfire and its extent are directly related to fuel loading and the absence of fuelbreaks. The only realistic tool the agencies have in reducing the fuel load is through a well managed grazing program. Wildlife will not adequately harvest fuels and manual removal is cost prohibitive. Grazing public land is essential if wildfire is to be minimized. Prescriptive grazing can be a tool that could be used to break up fuel loads. There are lots of grazing options. Designed fuel breaks using existing infrastructure and promoting fire resistant vegetation that is strategically located is important.	All	Both	emc0070GB
100.	Much of the rangeland in sagebrush habitat is made up of intermingled ownerships fashioned into functional grazing units via the Taylor Grazing Act and more recently NRCS programs. The management of these lands can only be successful if the private landowner is included. They have the work ethic, the physical contact with the land, the knowledge of site specificity, the longevity and ability to work a management plan, and can serve as a vehicle to secure many kinds of funding that the federal government is not eligible for as a single entity.	All	Both	emc0070GB
101.	As one drives through the millions of acres of open space in the west, you wonder who takes care of all this land. It is neither	All	Both	emc0070GB

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	the government nor the environmental community; it is the rancher whose house is out of the wind and out of site. The west does not have another management option. Be careful of what you regulate as a result of this scoping process.			
102.	In many cases grazing permitee's Taylor Grazing dollars or other non-federal funds have paid for range improvements. What analysis will be included in the EIS to assure the continued availability of these funds are not prohibited or reduced by the outcome of the EIS?	All	Both	emc0071GB
103.	A possible new strategy to include for analysis might be to do a complete review of the positive impacts that ranching, grazing, Taylor Grazing projects, Boy Scout projects and etc. have on the ground to the benefit of Sage Grouse habitat and include them in the EIS. This may provide the opportunity to expand on this type of project in any alternative at the end of this work.	All	Both	emc0071GB
104.	We are very concerned about the domestic livestock grazing systems authorized by many of the administrative units of the Bureau of Land Management (BLM) and U.S. Forest Service (USFS). Greater Sage-Grouse require sufficient cover for nesting (April and May), brood rearing (May, June, July) and survival, and it is our opinion that few grazing systems authorized by these administrative units provide adequate cover for these activities and during these times of the year to ensure sufficient reproductive success for Greater Sage-Grouse. Without adequate cover for nesting and brood rearing, it is our opinion-and the professional opinion of many scientists-that Greater Sage-Grouse populations will continue to decline throughout their range. We believe that nearly all grazing systems need to incorporate adequate rest or very low livestock stocking rate (>35% annual utilization) to enablethe native vegetation to maintain its health and vigor and to provide adequate cover for Greater SageGrouse and other grassland/shrubland birds. To provide for successful nesting and brood rearing, good cover is needed in the spring from the previous years growth and in the spring and summer from the current years growth. Even with less than 35% utilization, many areas near water sources can be overgrazed and ultimately provide poor nesting and brood-rearing success.	All	Both	emc0074GB
105.	Recommendation #1 - We recommend that the BLM and USFS require all related administrative units to modify their respective livestock grazing permits and grazing allotment management plans to incorporate grazing systems that provide at least 15-month of rest every 3 years for each grazing pasture or require immediate removal of livestock once a 35% utilization level is reached within any given year on federal public lands under their prevue.	All	Both	emc0074GB
106.	Livestock-free portions of our Greater Sage-Grouse range may be necessary to ensure viable populations are maintained in otherwise disturbed landscapes, particularly in conservation priority (core) areas. We believe that closing these areas to livestock grazing through the permanent retirement of existing grazing permits should protect them from the risk of overgrazing, greatly reduce the risk of invasion by undesirable vegetation (invasive plants), and enable federal land managers to compare these lands to other grazed areas, enabling them to better evaluate the effects of livestock grazing on these sagebrush ecosystems and Greater Sage-Grouse populations.	All	Both	emc0074GB
107.	Recommendation #2 - We recommend that the BLM and USFS retain retirement of grazing privileges as an option in priority conservation (core) areas for Greater Sage-Grouse when base property is transferred or the current permittee is willing to retire grazing on all or part of an allotment.	All	Both	emc0074GB

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108.	Water can be a critical factor in determining the abundance and distribution of wildlife, especially in arid western ecosystems; although the impacts vary by species, habitat, and season. Over the past 150 years, the availability and distribution of water have been drastically altered by both natural processes and human actions. By some estimates, 95 percent of natural riparian ecosystems (those associated with water features) and wetlands in the arid West already have been degraded or lost. We believe the loss of natural water resources threatens Greater Sage-Grouse population viability, but we realize domestic livestock also require water to survive. Federal public-land managers and ranchers have improved existing water supplies and developed new water systems for livestock and wildlife. Hundreds-of-thousands of these water developments are scattered across the western U.S. Water developments increasingly replace or augment diminishing natural sources in many areas and have become crucial for many species, especially Greater SageGrouse when stressed by drought, high temperatures or rearing young. These water sources and associated moist-soil (riparian) habitats are critical for Greater Sage-Grouse survival and reproduction. Springs, wetlands, seeps, wet meadows, bogs, fens, ephemeral and permanent streams, rivers, ponds, stock tanks and lakes all serve as or are surrounded by crucial habitats for Greater Sage-Grouse and other wildlife in the arid West. We believe that all water sources and associated moist-soil habitats on federal public lands should be protected from the effects of livestock disturbance and grazing. In most cases, livestock drinking water can be transported away from water sources and riparian habitats to sites that are not in limited supply and that are more compatible with livestock disturbance and grazing.	All	Both	emc0074GB
109.	While Greater Sage-Grouse depend on livestock troughs and tanks for water, they also can drown while attempting to drink or bathe in these structures. It is a common practice to temporarily shut off water to tanks and troughs when livestock are moved, forcing Greater Sage-Grouse and other wildlife that have become dependent on that water supply to find alternative-often distant-sources or perish. This is particularly harmful during the warmest months when Greater Sage-Grouse are rearing young. We believe that preventing wildlife fatalities at water troughs not only conserves Greater Sage-Grouse, but also helps maintain the clean, uncontaminated water that is critical for any livestock operation. Decaying animal carcasses greatly diminish water quality.	All	Both	emc0074GB
110.	The need for wildlife escape structures (also called wildlife ramps or bird ladders) in troughs and tanks has been documented. Most livestock water troughs were not designed or installed with Greater SageGrouse in mind, and they seldom include a means of escape for wild animals that fall into the water while attempting to drink or bathe. These animals drown unless a properly-designed and well-placed escape structure is available. Wildlife drownings increase when alternative water supplies are unavailable and escape structures are absent, especially when water levels are lowest and during periods of drought, high temperatures and wind. Tragically, some of the most common attempts to provide wildlife escape structures do not work or are unreliable. Effective wildlife escape structures are easy and inexpensive to build and install and can eliminate Greater Sage-Grouse mortality in water troughs and tanks. Properly designed and installed, these structures also improve livestock health by maintaining clean water that's uncontaminated by drowned Greater Sage-Grouse or other wildlife.	All	Both	emc0074GB

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111.	Recommendation #4 - We recommend that all troughs and tanks with vertical or nearly vertical sides be modified with escape structures and that high water levels in these troughs and tanks be maintained throughout the year.	All	Both	emc0074GB
112.	With regards to grazing rights on BLM lands, the BLM will honor existing contracts. However, once said contracts are set to expire, if grazing should fall within the 5.5 mile radius of a lek, regardless of its activity designation, the BLM will make it mandatory for BLM offices to, "…consider the conservation measure(s) [of the Greater Sage Grouse] to the fullest extent…" when considering grazing permit renewals. Understanding this could cover large tracts of previously leased lands to grazing permits, I argue the BLM has faulted on the preservation and enhancement of the Greater Sage Grouse, therefore contributing to its current ESA status.	All	BLM	emc0074RM
113.	Livestock grazing is one of the most significant management practices affecting sage grouse, partly because grazing is such a widespread practice with far-ranging effects on vegetation height and density affecting cover for sage grouse, as well as palatability and nutritional quality of forbs utilized by grouse chicks. Grazing also has numerous undesired side-effects such as weeds, roads, fences, non-native seedings, and water developments. The EIS must address specific standards for sage-grouse friendly grazing practices, including fewer animals, shorter grazing seasons, more rest, closed allotments, and curtailment of the side effects of fences, roads, weeds, etc.	All	Both	emc0078GB
114.	The EIS should address the conflict between the common practice of adding fencing to grazing allotments, which is perceived to improve livestock management, but is also adverse to sage grouse. What criteria can help resolve this conflict?	All	Both	emc0078GB
115.	Ranchers and farmers live in these beautiful, rural areas. We try to be good stewards of the land we use. A lot of it we share with many others with the same values.	All	Both	emc0082GB
116.	Although livestock grazing is the highest and best use for much BLM land, many areas of public land managed by BLM grazing land could easily be better managed for wildlife. On some BLM land, decades of livestock use has continued to depress game habitat as clearly evidenced by adjacent right of way and sometimes adjacent private land sagebrush, greasewood, and habitat cover. Habit studies have rarely appeared to change actual use. Certainly cost feasibility prohibits fencing off or separating many small areas of riparian or other critical habitat. However, many areas exist where habit can be significantly protected without major effects on livestock permit numbers and, in considering minimal grazing fees, certainly without significantly impacting income from public lands. I also believe that through the years the oversight and field reviews by range staff has varied greatly between different BLM areas.	All	Both	emc0082RM
117.	Although any increase in grazing costs will meet with objections, a moderate raise is so long overdue that it is difficult to imaging a sound basis for continued objection. Better care of public high wildlife habitat value and riparian areas including some additional fence and water development with emphasis on wildlife habitat will also encounter some objections. Although I believe that sage grouse numbers remain well above the threshold of endangerment or seriously threatened species and will remain so, the simple suggestion alone that such designation is possible should be a great embarrassment to an agency trusted with management of the public's lands. It is time for simple and logical management adjustments, not studies.	All	Both	emc0082RM
118.	RANGE MANAGEMENT ISSUE: The proposed Conservation Measures fail to include a discussion of the conversion of sheep dominant grazing to	All	Both	emc0083GB

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	cattle dominant grazing on public land in the Great Basin and possibly Colorado Plateau as being a potential indirect herbivory impact on sage grouse and their habitat. In Nevada and throughout much the West, there has been a shift in the dominant domestic livestock grazer on public and USFS administered lands. Not long ago, domestic sheep were the most common permitted livestock on grazing allotments in the Great Basin and Colorado Plateau physiographic areas. Domestic sheep closely mimicked the predominant historic grazer – wild bighorn sheep. Economic and other factors caused the gradual switch to cattle. This has and will have an important effect on the rangeland with sage grouse habitat. Cattle select grasses and forbs as the preferred forage. Cattle often stay in one area, eating until the understory is gone, or the cattle are removed. Under cattle grazing over time, rangelands become dominated by "increaser" shrubs and encroaching woodlands as "decreaser" understory species are used. Domestic sheep however, eat little bits of grasses, forbs, shrubs and small pinyon-juniper trees that can keep a vegetation community more balanced. Additionally, domestic sheep are herded daily and can easily be rotated throughout a pasture / allotment. Cattle are occasionally pushed, certainly not daily, and often return to an area already grazed. Old-time sheep producers followed a practice for grazing their sheep of "once over, lightly".. Domestic sheep grazing may assist in maintaining sage grouse food items such as ants and certain forbs for chicks. In eastern Nevada, when the majority of grazing allotments had domestic sheep rather than cattle (pre-1980-90's), sage grouse numbers were strong and fluctuated within a normal range. No studies to date have tried to prove a correlation between historically higher numbers of sage grouse (at least in Nevada) and predominance of domestic sheep grazing. The possible correlation exists as grey science and historical anecdotal information that just might be true. A recommendation should be made to favor domestic sheep grazing over cattle when possible and disallow conversion of an existing domestic sheep permit in sage grouse habitat unless no other option exists.			
119.	ISSUE: The proposed Conservation Measures need to include yearlong livestock herbivory in the Great Basin and Colorado Plateau as being a direct impact on sage grouse and their habitat. There are currently several livestock grazing allotments, with Nevada as an example, that have permits and allotment plans which allow yearlong grazing in some of the most fragile sage grouse habitat areas. In theory, livestock are rotated through pastures within the allotment during the year. Rotation rarely occurs due to permittee negligence *or is in practice, unworkable due to the topography / elevation of the allotment. While yearlong grazing may be sustainable in Montana and Wyoming at lower elevations due to summer precipitation which allows plant re-growth in summer, it is not acceptable in Nevada and other arid areas that are winter precipitation dependent. This is especially true where cattle now graze rather than domestic sheep for the reasons stated in the preceding narrative. * In at least one 500,000 acre+ allotment in Nevada, where sage grouse used to be plentiful in a domestic sheep allotment, sage grouse are now seen only occasionally. The current permittee proudly states that his cattle search out forage all over the allotment yearlong. He is also proud of his cattle knocking down "overgrown" riparian areas along the allotment's only	All	Both	emc0083GB

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	creek so that both his livestock and wildlife can water. A few sage grouse still use the creek. There is no attempt made to enforce the allotment management plan for rotating livestock on this yearlong grazing allotment much less any attempt to enforce vegetation standards.			
120.	ISSUE: The proposed Conservation measures need to include class of livestock, i.e. cow / calf pairsopposed to yearlings / steers, as being an indirect herbivory impact on sage grouse and their habitat. For a variety of reasons cattle may continue to be the dominant permitted grazer. The kind of cow that grazes is important to sage grouse habitat. Rangeland managers and livestock producers know that cow / calf pairs use a grazing allotment differently than steers, particularly yearlings. Cows tend to remain in gentler topography and nearer water which in Nevada means areas with riparian areas. Stockmen tend to not push pairs into rougher country. Use levels on riparian areas and bottom lands are met quickly – often well ahead of the AMP's "off" date. When this occurs, pairs often remain in the pasture or allotment for a variety of reasons; utilization levels are exceeded, riparian / range conditions change or deteriorate. Conversely, steers will travel farther within an allotment to seek forage and can be pushed into rougher country. Yearling animals exhibit a natural curiosity that helps disperse these animals better and they can be pushed further into rougher country. A recommendation to favor yearlings / steers in sage grouse habitat should be made.	All	Both	emc0083GB
121.	ISSUE: The proposed Conservation Measures contain a glaring inconsistency in how measures are written depending on the political volatility of certain programs. Many of the proposed Conservation Measures are written in very strong language using words such as "avoid", "do not allow" etc. The glaring exception to this is the politically charged range program. Conservation Measures in that program are the same ones that have been written into LUPs for years. As proposed, these will be re-stated as something that should be "considered". The reason for the inconsistency would be that "we need long-term studies" to make definitive recommendations. Range studies have been going on for years and the conservation measures can be written only as suggestions? One wonders how we can be so certain of impacts caused by programs with a relatively short history and use such strong language in the recommendations for those. The Measures language should be standardized at least for the basic management practices – we do know those for healthy range vegetation.	All	Both	emc0083GB
122.	Limits on road access do not necessarily reduce cattle grazing, and grazing reduces floristic diversity that supports sage grouse. In addition to road limitation, therefore, cattle grazing limitation is needed until areas of poor grouse habitat quality are identified, at which time grazing may be allowed or re-allowed in these areas. There are other places to grow cows, but sage grouse grow only here.	All	Both	emc0083RM
123.	The Report identifies several potential impacts to sage-grouse from grazing; however, the discussion, fails to put into perspective that many of these impacts are not just livestock related. Plant communities change over time, with or without grazing, and when the plant communities are not managed concomitantly with grazing, the changes discussed in the Report can occur. BLM and the FS have the responsibility for managing vegetation on public lands, and vegetation management based on the ESDs, and State and Transition Models (STMs) for each ESD should be implemented as part of any conservation measures. Without appropriate vegetation management, the ability of the ecological sites to support sage-grouse populations will not be maintained.	All	Both	emc0084GB
124.	The Report's assumption that retiring grazing privileges will improve habitat for sage-grouse is also unfounded. As mentioned above, management of both the vegetation and grazing is required to ensure that viable sage-grouse habitat is	All	Both	emc0084GB

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	provided. Moreover, where grazing privileges are retired, the base property (i.e., private fee lands) is likely to be used for other uses, such as commercial development, vacation homes or rural homesteads. The BLM must consider the potential impacts of such uses in any analysis of future grazing restrictions.			
125.	Reduce livestock grazing (cattle, sheep and wild horses) as necessary to restore depleted sage-grouse habitat. Grazing permits should be revised to reflect acceptable stocking rates for compatibility with sagegrouse.	All	Both	emc0085GB
126.	Grazing receives five pages of summary discussion, much of which seems to stand in contrast to pioneer records, ranchers' histories and current resident witness to sage grouse life cycle, habit and extent. The discussion does not reflect the measured and diligent statement of Nevada Assemblyman Ira Hansen (2011).	All	Both	emc0087GB
127.	Research has shown that properly managed grazing improves habitat for ground-dwelling birds, such as sage grouse (Sage-Grouse ((Centrocercus Urophasianus)) Use of Different-Aged Burns and the Effects of Coyote Control in Southwestern Wyoming by Steven J. Slater). In sage brush areas, sheep crop the brush to a height favored by sage grouse, leaving it neither to course nor too sparse. In addition, grouse (and other prey species, such as deer) tend to be more abundant in areas, private and public, where sheep are grazed, due to predator control.	All	Both	emc0088RM
128.	Research has shown that properly managed grazing improves habitat for ground-dwelling birds, such as sage grouse (Sage-Grouse ((Centrocercus Urophasianus)) Use of Different-Aged Burns and the Effects of Coyote Control in Southwestern Wyoming by Steven J. Slater). In sage brush areas, sheep crop the brush to a height favored by sage grouse, leaving it neither to course nor too sparse. In addition, grouse (and other prey species, such as deer) tend to be more abundant in areas, private and public, where sheep are grazed, due to predator control	All	Both	emc0088RM
129.	My primary concern is the loss and degradation of habitat caused by incompatible uses. This includes extraction of energy sources and the grazing by livestock. Recent increases in the amount of federal lands that have been opened to oil and gas drilling has lead to loss of large patches of grouse habitat. Degradation from over-grazing and grazing in an appropriate areas has destroyed thousands (millions??) more acres. Both of these activities need to be better managed and monitored, or better yet, not even allowed in Greater Sage-grouse habitat.	All	Both	emc0102GB
130.	According to BLM Instruction Memorandum (IM) No. 2012-043 and as summarized in the BLM's National Greater Sage-Grouse Planning Strategy, emphasis for protecting and managing greater sage-grouse habitat incorporates the following primary principles: 1) Protection of unfragmented habitats; 2) Minimization of habitat loss and fragmentation; and 3) Management of habitats to maintain, enhance, or restore conditions that meet greater sage-grouse life history needs. Livestock grazing contributes positively to the above primary principles, being both compatible with and beneficial to greater sage-grouse habitat conservation. Resource users such as ranchers are the stewards of the greater sage-grouse habitat on both the private and public land they use. Ranchers provide an outstanding line of defense against fire and noxious weeds. Ranchers typically manage forage for optimum production, and are the primary providers of private land open space in Wyoming. Without livestock producers utilizing and protecting private lands of the west, large areas of greater sagegrouse habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified threats to greater sage-grouse habitat, including wildfire, invasive plants, and predation.	All	Both	emc0106RM

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131.	As recognized by the BLM in IM No. 2012-043, grazing can be "used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to [the] Greater Sage-Grouse and its habitat." The IM continues, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." According to Natural Resources Conservation Service (NRCS), grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition." Sound defensible scientific research indicates that grazing is beneficial to the greater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires. (Launchbaugh et al.2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et al.1994, Evans 1996). It has also been used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994).	All	Both	emc0106RM
132.	Services provided by livestock producers can only be furnished when those producers are viable in the long run. The best strategies land management agencies can use will be those that are workable for livestock producers and the greater sage grouse. Reducing livestock grazing will not work as a strategy. Reducing livestock grazing would increase pressure on private lands and could reduce the viability of livestock producers. This reduction of viability could reduce the private land greater sage grouse habitat.	All	Both	emc0106RM
133.	Livestock grazing is compatible and beneficial to greater sage-grouse habitat conservation. Livestock producers are the stewards of the greater sage-grouse habitat on both the private and public range lands. Allowing livestock producers the continued use of public lands without unnecessary restrictions due to the potential listing of a species with such a large habitat encourages this stewardship and prevents fragmentation through development. As seen in many areas of successful rangeland conservation, livestock grazing and habitat conservation go hand in hand.	All	Both	emc0106RM
134.	I also want to know the real impact of public-land domestic grazing on this and other wildlife species, be it good, bad or indifferent - the truth needs to be known.	All	Both	emc0107GB
135.	Consider complete removal of livestock if net primary production is less than 200lbs/acre (Connelly, J. W., M. A. Schroeder, A. R. Sands, and C. E. Braun. 2000. Guidelines to manage sage grouse populations and their habitats. Wildl. Soc. Bull. 28(4):967-985);	All	Both	emc0109GB
136.	Remove all unnecessary structures, including livestock management facilitating structures (e.g. fencing, and watering facilities), roads, buildings, trees, cell towers, power lines, haystacks, old farm equipment etc. from all priority areas. Only add new structures if it can be demonstrated that their habitat improvement value to GSG outweighs the potential costs to GSG; and	All	Both	emc0109GB
137.	Provide site-specific information on all Leks to the permittees for grazing adjustments within the existing RMPs. There should be a stated ability to adjust season of use, timing, and rest rotation within current authorized allotments to address specified Leks, even if they don't follow the BA. The only option shouldn't be reduced grazing alternatives, especially when there is compliance with land health standards.	All	Both	emc0112

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Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
138.	Grazing - Interim Management Policies and Procedures (IMPP) In the memorandum No. 2012-043, dated 12-27-11, it states that this IM is "…to be applied to ongoing … authorizations and activities.." "….across multiple programs, in order of threat magnitude, while the BLM considers amendment or revisions to LUPs." It continues to discuss the various policies and procedures related to specific actions and relationship to grazing: 1. Livestock Grazing Management Plans: Grazing is number 6 on the list of threats with a relative rank of 45 they provide the greatest visibility and generate the greatest judicial action, therefore are perceived as having the largest impact. Fully implemented "Managed Livestock Grazing plans' meet the three most critical requirements for Habitat viability a. Impacts i. Time duration ii. Timing season iii. Frequency iv. Intensity of grazing b. Management of plant succession i. Grazing ii. Fire iii. Chemical treatment c. Land Health Standards i. Grazing management practices – plan ii. Replace scarcity mentality with multiple use and abundance mentality iii. 'Science based' – diverse team members, i.e. Utah Grazing Improvement project. iv. State and local leadership – defined based on the ground participation v. Provide 'political coverage for the right management decisions.	All	Both	emc0112GB
139.	Grazing, a Habitat Enhancement Tool: While it is noted that "… grazing practices can also be used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to Greater Sage-Grouse…." The IMPP approach addresses "….localized adverse effects…" and places an undue constraint and burden on Public Land grazers due to "… the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity …to improve…habitat.." While the connotation is not necessarily negative, previous efforts at range improvements have been constrained: a. The funding for improvements has been limited in regards to fencing, water facilities, and etc. While additional funding has been appropriated, BLM officials indicate a large percentage of it will be directed towards NEPA review and monitoring, justifiably so. Even with NRCS funding, there needs to be additional funds for 'on the ground' projects. The limitation to the state plan [referenced above] was the lack of funding. b. When funding is available, or permittees are willing to provide, the agency is limited due to a lack of a biological assessment. There needs to be a defined set of permissible actions that can occur to facilitate improvements within the IM and once NEPA is complete. c. The 'Wildfire Suppression and Fuels Management' section of the IMPP doesn't mention Sage Brush stripping; there are	All	Both	emc0112GB

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	numerous PPH that need sage treatment to increase the viability of forbes, grasses, and sage health. Numerous allotments are overgrown, limiting the native vegetation and vigor of the sage. All methods and alternatives to improving range health, a critical part of 'Managed Livestock Grazing Plans'. (see Utah Grazing Improvement Project, Mr. bill Hopkins)			
140.	Grazing Alternatives: Within the range of alternatives needs to be broadened to include the consolidation of adjoining allotments to 'super grazing allotments', which will allow full utilization for grazing for all permittees while providing for deferred and/or rest-rotation grazing, allotment treatments of junipers, sage, and native grasses. a. With a 'no grazing alternative' considered, the NEPA document needs to address the micro socio-economic impacts on the community not just the usual macro considerations. "The council on Environmental Quality's (CEQ's) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR 1500-1508) point-out that the "human environment" is to be "interpreted comprehensively" to include "the natural and physical environment and the relationship of people with that environment" (40 CFR 1508.14). Agencies need to assess not only so-called, "direct" effects, but also "aesthetic, historic, cultural, economic, social, or health" effects, "whether direct, indirect, or cumulative" (40 CFR 1508.8).	All	Both	emc0112GB
141.	With respect to Retirement of Grazing Privileges on page 17 of the NTT Report, - "Maintain retirement of grazing privileges as an option in priority sage-grouse areas when base property is transferred or the current permittee is willing to retire grazing on all or part of an allotment. Analyze the adverse impacts of no livestock use on wildfire and invasive species threats (Crawford et al. 2004) in evaluating retirement proposals. - Planning direction Note: Each planning effort will identify the specific allotment(s) where permanent retirement of grazing privileges is potentially beneficial." Several options are potentially available for creative grazing administration. Although this section is specific to Retirement of Grazing Privileges and specific allotments in high priority habitats, presumably it does not preclude active pursuit of retirement of grazing privileges in non-priority areas so that grazing privileges in the priority habitat could be shifted to the non-priority areas. Is that interpretation accurate? The challenge for the BLM is to be able to "think outside the box" programmatically and be open-minded about innovations that might be proposed. With regard to the upcoming EIS process, this presents a situation where Headquarters Office guidance seems warranted regarding the nature and scope of potential grazing and grazing administration modifications that might be analyzed in the EISs, perhaps even addressing things like non-use and suspended non-use. Some innovations could necessitate changes in either regulation or law that could represent marked departures from the BLM's historical and agency-culture approach to management. Clearly, statutory and regulatory changes would not be achievable prior to the EIS process being fully underway. However the effects of some proposed changes could be analyzed in the EIS as to how they would facilitate BLM achieving it goals and objectives. Although it could be argued that such considerations are not within the scope of this particular EIS effort, I would disagree. Since EISs are supposed to seriously consider all reasonable alternatives, this presents a high-profile opportunity to do just that, and in the process lay the foundation for pursuing reasoned and reasonable changes, including legislative and regulatory. The National Resource Advisory Council could serve as a valuable "sounding board" for any such proposals.	All	BLM	emc0113GB

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	EIS analysis of these and other changes would provide a building block for longer-term changes that could help the BLM succeed in its "new paradigm" endeavor. One example of a programmatic proposal is for the BLM to initiate a long-term infrastructure reduction program on pubic lands as a means of enabling landscape healing and attendant defragmentation of habitat. The effects of such a program could be analyzed, with each EIS identifying areas suitable for infrastructure reduction. Although fences are the primary consideration here, other infrastructure could be considered. As a tool for recovering habitats, the concept of infrastructure removal to improve habitats has historic significance. Recent examples that are part of long-term restoration programs include American Prairie Reserve fence removal (American Prairie Foundation) and dam removals to restore fisheries. Coincidentally, the current header photo on the American Prairie Foundation home page features greater sage-grouse. Thinking outside the box in support of the new paradigm. With respect to the "Planning direction Note," presumably the habitat to be conserved by retiring grazing would either be of reasonably high quality, robustly resilient and highly resistant to change, or classified through the HAF as potentially-suitable and likely to respond fairly quickly from discontinued grazing, otherwise it would seemingly be a low priority for discontinuing grazing. Is that an accurate characterization? With respect to the phrase "potentially beneficial," it would be useful to present some general criteria that may be used in making such determination. What is the time frame for achieving benefits from cessation of grazing? Given the length of time it takes lowerprecipitation habitats to demonstrably change after grazing is removed, some benefits might not be achieved for decades. Could the removal or substantial modification of infrastructure be a consideration in making the "potentially beneficial" determination? It certainly seems so. Any EIS analysis of grazing privilege retirements to improve sage-grouse habitat would seemingly address associated socio-economic impacts. Although this EIS effort is not the most appropriate venue for an economic analysis of federal agency grazing fees and how they affect use of the land, it seems appropriate to incorporate a discussion comparing federal grazing fees and those charged for state and private lands, particularly as they may relate to grazing privilege retirement.			
142.	19) Comment: Range suitability, "expected use"- Incorporate land slope considerations (range suitability, "expected use") into all proposed management actions and projects. Delineate such gradients for all allotments within both occupied and suitable but unoccupied sage-grouse habitats. This information will help better determine how habitats would likely respond to changes in grazing.	All	Both	emc0113GB
143.	My hope is that all attempts to enhance the sage grouse habitat are kept reasonable and sensible. My concern is for the welfare of the farmers and ranchers that could potentially be affected in their public land allotments. Ranchers haven't been doing much different in their continuing operations and should not be blamed unduly for the decrease in habitat for the sage grouse. Ranchers have been grazing public lands for over a century and not until just recently has the habitat been an issue.	All	Both	emc0118GB
144.	The EIS must take an honest look at the impact of cattle grazing on the public lands in regard to the sage grouse. Is grazing destroying the nesting cover under sagebrush to such a degree that sage-grouse populations are negatively impacted? Can	All	Both	emc0121GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	healthy sage-grouse populations exist in grazing areas? The analysis should also apply to horses and burros where their numbers are significant.			
145.	The IM states that "enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." We agree not only that it may be, but that it is the most cost-effective approach. In 1960 when Sage Grouse populations were the highest, the Utah BLM permitted livestock AUMs was 1.7 million. The Sage Grouse population decline closely resembles the decline of permitted livestock AUMs to the current .7 million AUMs. The numbers are very similar for Forest Service AUM's.	All	Both	emc0126GB
146.	The IM talks about when droughts occur evaluate "season of use and stocking rate and adjust through coordination and annual billings process" If grazing has been properly planned there should be plenty of grass in the bank to carry grazing through drought periods.	All	Both	emc0126GB
147.	The IM recommends coordinating with other federal and state agencies and non-federal partners to leverage funding for habitat projects and to fully implement the recent MOU between the BLM, NRCS, FWS and USFS for enhancing Sage-Grouse habitat through grazing practices. We applaud this approach, but strongly urge to invest in and improve grazing management first, and then doing the appropriate habitat projects where needed.	All	Both	emc0126GB
148.	The IM talks about prioritizing supervision and effectiveness monitoring of grazing activities to ensure compliance. What this monitoring is, needs to be defined (UDAF/UGIP have recommendations that we believe reduce cost and provide better monitoring data).	All	Both	emc0126GB
149.	What is meant by "continue to evaluate existing range improvements" For how long? What will be monitored on a watering trough? A fence?	All	Both	emc0126GB
150.	The Memo States "pursue opportunities to incorporate multiple allotments under a single management plan/strategy where incorporation would result in enhancing Greater Sage-Grouse populations or its habitat as determined in coordination with the respective state wildlife agency" This is a great approach, we would like to add the coordination of the Grazing Improvement Program in Utah which has real experience in working to do exactly this (To be successful, such a plan must benefit permittees, Sage Grouse, and sustainable resource health) .	All	Both	emc0126GB
151.	The IM doesn't mention the benefits that can be obtained by using multiple grazing species to achieve desired vegetation conditions for Sage-Grouse. An example would be winter grazing with sheep to enhance sage-brush.	All	Both	emc0126GB
152.	Prescriptive grazing should be considered as the priority tool for use in increasing and establishment of habitat for Sage Grouse.	All	Both	emc0126GB
153.	Range Improvements to benefits species and maintained by permittees who hold Federal Range Maintenance agreements should be allowed mitigation credits.	All	Both	emc0126GB
154.	Our economic stability is dependent upon the ability to graze our cattle on public ground. If grazing on public ground becomes so limited that we are unable to make a viable living as cattle ranchers, we would have to explore other sources of revenue. None of the alternatives (development and or recreation to name a couple) would be beneficial to the sage grouse populations residing in and around our private holdings.	All	Both	emc0127GB
155.	I urge you to take a very large step back and look at more than curtailing grazing as a strategy to improve Mountain Sage	All	Both	emc0133GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	Grouse numbers.			
156.	Rangeland Management: The current range management is not working. The plan should put into affect trials of the varied management techniques that have been developed by Allen Savory and many others. Just try!!! If a grazing system works in Wyoming and not in Nevada then allow the system to be used in Wyoming and try something different in Nevada. Listen to the rancher as to the best grazing practices for an area. The rancher is not in the cow business but rather is in the grass business.	All	Both	emc0133GB
157.	Lands suitable for grazing shOldd continue to be designated for managed livestock grazing systems. The preferred alternative in this EIS should include assessments of the benefits and positive attributes of health y. actively growing grassland conditioned during the last 40 years through managed livestock grazing.	All	Both	emc0136GB
158.	Whenever the BLM determines that ecological conditions on an a llotment or pasture are not meeting the Fundamentals or the Standards and Guidelines it is imperative to take a "hard look" to determine if grazing is impacting the condition of a plant community and how it is happening. Professional opinion is inadequate and should not serve as a substitute for intensive site investigations leaving BLM with an arbitrary decision.	All	Both	emc0136GB
159.	Solutions to problem areas should be written with the perspective that livestock grazing can be cunailed through adaptive managcment techniques and not through eli mination of the animal usc. Utilization levels should not be based on residual stubble heights without conducting appropriate height to weight relationship studies. because different grass species do not all reach total maturity heights that are the same. Furthermore. grass species do not grow as a monoculture plant community. Species are randomly interspersed and onc-size-fits all grazing standards have never been successful tools for vegetation management. Vegetation treatments applied to the land arc valuable tools and grazing should be included as part of the solution instead of iso lated as a threat to the success of meeting the project objective.	All	Both	emc0136GB
160.	Due to the size and scope of these actions by the land management agencies, it is imperative that ranchers and the public land grazing industry are involved throughout the process.	All	Both	emc0140RM
161.	According to BLM Instruction Memorandum (IM) No. 2012-043 and as summarized in the BLM's National Greater Sage-Grouse Planning Strategy, emphasis for protecting and managing greater sage-grouse habitat incorporates the following primary principles: 1) Protection of unfragmented habitats; 2) Minimization of habitat loss and fragmentation; and 3) Management of habitats to maintain, enhance, or restore conditions that meet greater sage-grouse life history needs. Livestock grazing contributes positively to the above primary principles, being both compatible with and beneficial to greater sage-grouse habitat conservation. Ranchers are the stewards of the greater sage-grouse habitat on both the private and public land they use. Without ranchers, who provide an effective line of defense against fire and noxious weeds, manage forage for optimum production, and are the primary protectors of open space in the private lands of the west, large areas of greater sage-grouse habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified threats to greater sage-grouse habitat, including wildfire, invasive plants, and urbanization and development.	All	Both	emc0140RM

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	As recognized by the BLM in IM No. 2012-043, grazing can be "used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to [the] Greater Sage-Grouse and its habitat." The IM continues, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands" (emphasis added). According to the Natural Resources Conservation Service (NRCS), grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition." Sound scientific research indicates that grazing is beneficial to the greater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires (Launchbaugh et al. 2007), improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et al.1994, Evans 1996), and can be used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994). Furthermore, grazing with appropriate range improvements can be utilized in some areas to improve greater sage-grouse habitat to mitigate for the disturbance caused by other multiple-use activities, such as mineral development.			
162.	Evidence of the real impact of the above-mentioned benefits has been demonstrated by landscape-scale level statistics. Permitted livestock levels (animal unit months, or AUMs) have dropped dramatically on BLM and FS lands from 1940 to today. Greater sage-grouse numbers have mirrored that decline. In Utah, for example, a roughly four-fold decrease in permitted livestock AUMs parallels the decline in greater sage-grouse during the same period (see graphs, Appendix A). Also worth noting is the fact that mule deer, a species that relies on similar habitat conditions as greater sage-grouse, has suffered the same decline. This decline can be largely attributed to the lack of spring forbs and insects for broods naturally promoted by the added disturbance from greater numbers of livestock, and to the loss of the vast numbers of sheep (in Utah, numbers dropped from 2.2 million in 1930, to .25 million today) that at one time eased predation pressure (because predator control was more aggressive and because sheep served as an alternative food source to common predators), and encouraged multiple age classes of sage brush. Biologists often point to brood rearing and winter habitat limitations as factors influencing the decline of the greater sage-grouse. The diversity of sage brush age classes (once encouraged by greater numbers of sheep) is important to providing greater winter nutritional opportunity for the birds. We insist that this relationship be examined in every area occupied by greater-sage grouse.	All	Both	emc0140RM
163.	As further evidence of the value of livestock grazing to the health of greater sage-grouse, we are prepared to provide data from large, private land holdings where large ungulate numbers have doubled over the last 30 years and greater sage-grouse lek counts have increased five-fold.	All	Both	emc0140RM
164.	These services can only be provided by ranches that are stable and viable; thus, the best strategies for agency land managers to employ will be those that work for ranchers and greater sage-grouse, alike. Reducing livestock numbers is not effective as a mitigation strategy, and would, in fact, be detrimental to greater sagegrouse habitat and, ultimately, sage grouse numbers. The EIS and SEIS revisions should clarify that grazing should be used to reduce the risk of catastrophic wildfire, improve	All	Both	emc0140RM

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	forage, remove invasive species and provide open space. We strongly encourage the agencies to focus on those public land uses (or non-uses) that pose a real threat to the greater sage-grouse and its habitat.			
165.	Managed livestock grazing programs have the potential to maintain habitat diversity and quality for greater sage-grouse. For example, research shows that grazed lands produce forb growth and are preferred to nongrazed lands by greater sage-grouse (Evans 1986). Additionally, research shows that nesting cover (undercanopy vegetation) remains adequate with up to 40 percent utilization levels and is not substantially diminished until later in the grazing season, thus indicating that a variety of grazing regimes may be implemented without adversely affecting nesting (France et al.) In areas of high production, utilization in excess of 40 percent will still result in adequate nesting cover. Grazing systems should be implemented and managed to comply with the respective resource area management and forest plans. Site-localized, long-term trend monitoring should be the basis for determining compliance with management plans. Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the greater sage-grouse range, are not effective tools for adaptive management. Adequate residual plant cover must be determined by short-term and long-term monitoring, which includes accounting for various environmental conditions.	All	Both	emc0140RM
166.	Existing Rights As stated in the NOI, "The RMP and LMP amendments/revisions will recognize valid existing rights." We agree that all decisions made through revisions to RMPs and LMPs must recognize valid existing rights. As such, the EIS and SEIS alternatives should include provisions to ensure the continuation of our members' existing rights and uses. Inclusion of such provisions will also help ensure their ability to continue the practices that contribute to greater sage-grouse habitat conservation. Such provisions might include: • The "grandfathering" of long-established range structures into management plans; • The maintenance of grazing permit numbers no lower than at their present economically feasible levels; • RMPs and LMPs should include a full range of alternatives in order to provide flexibility adequate to avoid litigation; and • Provisions for grant funding to livestock producers for their greater sage-grouse management efforts.	All	Both	emc0140RM
167.	Greater sage-grouse are attracted to grazed meadows; research shows that peak attendance of greater sage-grouse in grazed meadows (especially hens with chicks, starting in late July) is significantly higher than in ungrazed meadows. Grazing, even at moderate levels, affects forb phenology by changing the maturation process. Ungrazed plants mature, seed and weather after dispersion of the seeds, whereas grazed plants continue to grow new leaves throughout the summer, providing food forbs for greater sage-grouse (Evans 1986).	All	Both	emc0140RM
168.	Rangeland improvements There are many functioning structures, such as livestock corrals, that have been in use and in place for years and which should be "grandfathered in" or exempted from changes to greater sage-grouse management plans. Research from the University of Idaho shows there is a six-fold decrease in bird strikes when fences are marked, particularly where the fences are in areas of flat terrain (Stevens et al. 2011). All marked fences should be taken into account for the benefit they have provided in saving greater sage-grouse. Marking should be considered as a strategy prior to any removal or relocation of fences. Initial research being conducted at the University of Idaho shows that fences' impacts on greater sage-grouse are more dependent on topography than on the proximity of fences to leks. Initial findings show that areas with varied	All	Both	emc0140RM

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	elevation may not require marked fencing or adjustments to fence locations, as the grouse tend to dive into the lek areas rather than fly overland to reach the leks. Thus, fence markers are better placed in areas of flat terrain (Stevens 2011). Electric fences should not fall under the same specifications as permanent fences. Electric fences are low-impact and often temporary, and should not be considered a threat to the greater sage-grouse.			
169.	Ongoing Conservation Actions by Ranchers Ranchers continually strive to improve the quality of the land they own or manage. All federal grazing permittees must manage their grazing allotments so as to achieve certain rangeland standards and guidelines. Consequently, enforceable measures are already in place to ensure that rangeland, and greater sage-grouse habitat, is in good condition. Furthermore, it is in their best interest to undertake sound conservation practices that improve both the quality of their grazing land and the wildlife habitat. These actions include: • Preservation of open space; • Noxious weed and invasive species eradication and containment; • Wildfire prevention and controlled burn efforts; • Managing for and maintaining a mosaic of habitat types; • Implementing grazing practices which benefit the greater sage-grouse, such as increasing nesting cover through rest-rotational grazing; • Selective placement of salt or supplements; • Developing wildlife watering sources and making them suitable for wildlife, i.e. installing bird ladders in troughs; • Fence marking and relocation; and • Predator control. NEPA analyses should not start with the assumption that livestock grazing is a threat to sage grouse conservation in management areas. Instead, such analyses should start from the premise that properly managed livestock grazing is beneficial to greater sage-grouse, as scientific studies have shown. The analyses, therefore, must consider how to incorporate properly managed livestock grazing into the protection strategy.	All	Both	emc0140RM
170.	In addition to the above-mentioned actions on behalf of ranchers, activities underway through the NRCS SGI should be recognized as beneficial to conservation of the greater sage-grouse on BLM and FS managed lands (Greater Sage-Grouse Multiple Agency MOU, 2008). Similar to the state and local working groups, any NEPA documentation must consider the work being done by the NRCS on private lands. NRCS conservation in a particular area may allow for less BLM-FS protection in that area, and vice versa. Unlike state and local working groups, however, we do not believe that BLM and FS documents must defer to the NRCS program. But the BLM-FS NEPA strategy must consider the effects of the NRCS program, and both programs must be coordinated and reflected in the NEPA documents.	All	Both	emc0140RM
171.	In order to avoid redundant regulations, it should be noted that the BLM has developed Rangeland Health Standards and Guidelines to manage grazing for uplands ecosystems and sensitive species. BLM is required by regulation to make adjustments to livestock grazing permits where standards are not being met and grazing is determined to be the cause. We believe this regulatory mechanism, having already been incorporated into existing RMPs and LMPs, should negate the need for further regulation in those areas.	All	Both	emc0140RM

Table C-6.A
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
172.	Conclusion Livestock grazing is compatible and beneficial to greater sage-grouse habitat conservation. This has been proven by independent, peer-reviewed, scientific analysis, as referenced many times in these comments. Ranchers are the stewards of the greater sage-grouse habitat on both the private and public range lands. Allowing ranchers the continued use of public lands without unnecessary restrictions due to the potential listing of a species with such a large habitat encourages this stewardship and prevents fragmentation through development. As seen in many areas of successful rangeland conservation, including efforts to conserve the Gunnison Sage-Grouse, livestock grazing and habitat conservation go hand in hand.	All	Both	emc0140RM
173.	Sage brushes greatest threat is not cattle, it is fire. And what fuels fire and spreads it besides wind? Grass. If cattle are not allowed to graze the land, the grass will only get thicker providing more fuel for a fire. Thus resulting in more sage brush being burnt and the habitat of sage hens being destroyed. Cattle are the best friend of sage hens and sage brush. It's merely common sense	All	Both	emc0141GB
174.	And what is to become of cattle ranchers and their cattle if you kick them off their grazing lands? It will disrupt the economic progress and put many ranchers out of business.	All	Both	emc0141GB
175.	Grazing should be considered a benefit to sage grouse habitat improvement and maintenance if correctly managed. The primary focus of managing grazing to improve sage grouse habitat should be to increase understory production and riparian areas (streams and meadows). There are several examples where livestock producers, BLM, private land owners and conservationists have come together and used grazing rotation management systems to enhance understory needed for sage grouse. Examples where rotation type grazing and water development projects are being used successfully to enhance sage grouse habitat and increased population levels are found at http://www.westgov.org/wga/publicat/sagegrouse-rpt.pd. The sage grouse planning strategy should have a discussion on this topic and encourage field offices and ranger districts to create partnerships and adopt successful practices into there grazing management. There should also be build-in flexibility to alter turn-out dates and length of grazing seasons depending on vegetation growth, drought conditions, etc. to benefit sage grouse. Set dates are not realistic from year to year.	All	Both	emc0142GB
176.	However, I can say this for most ranchers; we are very dedicated to the health and stability of these wonderful birds. The resident rancher can cooperate with scientist doing 'on the ground studies'.	All	Both	emc0143GB
177.	Closure of roads and trail, and elimination of grazing (both of which have been around long before the Sage Grouse popUlation were in trouble) is not the answer to restoration of the Grouse populations.	All	Both	emc0145GB
178.	Cattle actually exist in harmony with all types of birds and fowl and actually share areas of habitat and live alongside each other. Cattle do not eat sagebrush. But, prairie dogs do, thus destroying sage grouse habitats. However, cattle do help control wild fires by grazing overvegetated areas so these areas do not become tinderboxes for lightning strikes causing wild fires.	All	Both	emc0148GB
179.	I assume you will be asked to remove all grazing in at least one alternative. That is ok. It is part of the NEPA process. But to be fair you need to address the ability to increase the use of livestock grazing as a tool to build fire breaks, reduce fuel loads and protect key plant species from fire. Not through permits, but through fuel reduction projects. Permits are usually tied to specific dates, numbers, and types of livestock. Therefore, they are not adaptable to be used here. This use needs to be flexible and responsive to meet the needs of fuel reduction objectives and reduce fire occurrence. Some decisions need to	All	Both	emc0149GB

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	be made here to reduce processes on individual projects later. Long drawn out processes left to complete after this EIS will never work to help sage grouse or their habitats.			
180.	Address the effects of livestock grazing on sagegrouse nesting areas. (leks)	All	Both	emc0153GB
181.	Livestock grazing has consistently and adequately been managed over the last 50 years. Any references to "past grazing" impacts to the landscape should be limited unless the EIS can identify and quantify specific impacts that remain in the present time. The use of "historical grazing impacts" as a way to excuse the lack of current data and quantification through inventory collections is unacceptable as a way to judge how the sage grouse management can or cannot proceed. The EIS should recognize ways to provide for studies in the plan that take the steps necessary to gain knowledge and understanding for development of a road map for future activities. This may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.	All	Both	emc0159GB
182.	Lands suitable for grazing should continue to be designated for managed livestock grazing systems since adaptive management techniques are a major part of each grazing area and monitoring has been used to support the objectives of each plan. The preferred alternative in this EIS should include assessments of the benefits and positive attributes of healthy, actively growing grassland conditioned during the last 50 years using livestock grazing management. Solutions to problem areas should be written with the perspective that livestock grazing can be curtailed when needed through adaptive management techniques and not through elimination of animal use. The EIS should weigh the benefits of grazing where grasslands are a major component of the landscape. Rangeland vegetation benefits from grazing use and bunch grasses are invigorated by all herbivore use. Livestock grazing is an asset and is supported in science literature through rigorous, repeatable research studies which are superior to the speculative interpretations in gray literature.	All	Both	emc0159GB
183.	There are few scientific, peer-reviewed articles that address the grazing and sage-grouse issue, none that are designed experiments, and none with replicates. Most of what is available reflects conclusions or thoughts without empirical data, or it represents gray literature (Wambolt et. al, 2002).	All	Both	emc0159GB
184.	Grazing permitting should continue near current levels with the BLM identifying critical key sage grouse habitat that grazing permits should be minimized or even eliminated (moratorium) for 5 years within in key habitat	All	Both	emc0164GB
185.	I'm not suggesting that we go back to historic livestock AUMs or to reduce range land health. I am suggesting that livestock numbers do not negatively impact sage-grouse numbers and livestock grazing should not be restricted further due to sage-grouse	All	Both	emc0165GB
186.	The BLM should not cut livestock grazing unless a permit is not meeting rangeland health standards.	All	Both	emc0165GB
187.	I am very supportive of efforts to incorporate sagebrush habitat protections into every relevant plan or project administered by the BLM or the USFS, especially those relating to livestock grazing. It seems to me that neither grazing nor wildlife habitat are sustainable in much of the west as currently managed. But there is hope that innovative approaches, combined with data-based monitoring, can achieve a better habitat and a more appropriate balance between land uses.	All	Both	emc0169GB
188.	Another requirement may be to move the cattle into that pasture before the sage grouse start to nest. That way the introduction of cattle to the pasture wouldn't disturb nesting birds, but the birds could choose not to nest in that pasture if	All	Both	emc0172GB

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	the cattle were bothering them			
189.	On the National Forest, have had a pasture that we help mitigate livestock and grouse conflicts by the location of water sets based on dates. I was still allowed to use the pasture, but we also meet the grouse objective. It was a very workable compromise. In general I believe a healthy grazing system that incorporates rest, deferment, and rotation leads to habitat that is good for sage grouse. I think that is much better than a system where the same pastures are used every year at the same time.	All	Both	emc0172GB
190.	The range needs to be looked at as a system realizing when you take one pasture out of production more stress is placed on all of the other pastures. Many ranches have BLM, National Forest, State, and private lands that the one herd grazes. By reducing the amount of grazing on BLM you might be increasing the grazing on adjacent , land that is just as critical for sage grouse. That is one reason why I'm happy to see the collaboration with the National Forest on this EIS.	All	Both	emc0172GB
191.	The sage grouse management measures being contemplated have a potential for a large impact on hay farming and cattle ranching business. And measures to protect and enhance the grouse will come on top of significant impacts to livestock operations by a rapidly expanding Oregon wolf population.	All	Both	emc0173GB
192.	Water: Ranching in this area offers significant opportunities for water enhancements for sage grouse. Much of the key grouse habitat is on BLM and private land and buried pipelines are common. Currently water is pumped to tanks to meet livestock needs and not grouse needs. There would be an opportunity to pump water to meet grouse needs especially after cattle are moved off BLM and up to higher pastures. In some instances dedicated storage tanks could be installed to provide water if pipelines must be shut off for the season. In certain instances longer term water flows could provide moist soil sites in key brood use areas.	All	Both	emc0173GB
193.	Livestock grazing has consistently and adequately been managed over the last 50 years. Any references to "past grazing" impacts to the landscape should be limited unless the EIS can identify and quantify specific impacts that remain in the present time. The use of "historical grazing impacts" as a way to excuse the lack of current data and quantification through inventory collections is unacceptable as a way to judge how the sage grouse management can or cannot proceed. The EIS should recognize ways to provide for studies in the plan that take the steps necessary to gain knowledge and understanding for development of a road map for future activities. This may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.	All	Both	emc0179GB
194.	Lands suitable for grazing should continue to be designated for managed livestock grazing systems since adaptive management techniques are a major part of each grazing area and monitoring has been used to support the objectives of each plan. The preferred alternative in this EIS should include assessments of the benefits and positive attributes of healthy, actively growing grassland conditioned during the last 50 years using livestock grazing management. Solutions to problem areas should be written with the perspective that livestock grazing can be curtailed when needed through adaptive management techniques and not through elimination of animal use. The EIS should weigh the benefits of grazing where grasslands are a major component of the landscape. Rangeland vegetation benefits from grazing use and bunch grasses are invigorated by all herbivore use. Livestock grazing is an asset and is supported in science literature through rigorous,	All	Both	emc0179GB

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	repeatable research studies which are superior to the speculative interpretations in gray literature.			
195.	There are few scientific, peer-reviewed articles that address the grazing and sage-grouse issue —none that are designed experiments, and none with replicates. Most of what is available reflects conclusions or thoughts without empirical data, or it represents gray literature (Wambolt et. al, 2002).	All	Both	emc0179GB
196.	Livestock grazing has consistently and adequately been managed over the last 50 years. Any references to "past grazing" impacts to the landscape should be limited unless the EIS can identify and quantify specific impacts that remain in the present time. The use of "historical grazing impacts" as a way to excuse the lack of current data and quantification through inventory collections is unacceptable as a way to judge how the sage grouse management can or cannot proceed. The EIS should recognize ways to provide for studies in the plan that take the steps necessary to gain knowledge and understanding for development of a road map for future activities. This may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.	All	Both	emc0179GB
197.	Lands suitable for grazing should continue to be designated for managed livestock grazing systems since adaptive management techniques are a major part of each grazing area and monitoring has been used to support the objectives of each plan. The preferred alternative in this EIS should include assessments of the benefits and positive attributes of healthy, actively growing grassland conditioned during the last 50 years using livestock grazing management. Solutions to problem areas should be written with the perspective that livestock grazing can be curtailed when needed through adaptive management techniques and not through elimination of animal use. The EIS should weigh the benefits of grazing where grasslands are a major component of the landscape. Rangeland vegetation benefits from grazing use and bunch grasses are invigorated by all herbivore use. Livestock grazing is an asset and is supported in science literature through rigorous, repeatable research studies which are superior to the speculative interpretations in gray literature.	All	Both	emc0179GB
198.	There are few scientific, peer-reviewed articles that address the grazing and sage-grouse issue —none that are designed experiments, and none with replicates. Most of what is available reflects conclusions or thoughts without empirical data, or it represents gray literature (Wambolt et. al, 2002).	All	Both	emc0179GB
199.	Unfortunately, the Greater Sage Grouse has fallen victim to that same westward expansion, but the culprits aren't really hunters--it's over development, be it housing or over grazing or the new pandemic-- gas & oil development.	All	Both	emc0182rm
200.	I'm a big proponent of habitat enhancement for this bird species via prescribed burns that stimulate historic natural fire patterns, along with other measures, such as light-on-the-land, sustainable grazing methods (or complete cow restriction in some fragile areas). The type of land stewardship will of course also benefit many other native lifeforms in our region's sagebrush steppelands.	All	Both	emc0189GB
201.	BLM has never reduced a grazing permit to account for the loss of productive rangeland. Every NEPA document looks at individual projects and decides they are insignificant to grazing, never looking at the cumulative effect. So as a consequence, we have the same number of livestock grazing on a much reduced rangeland base, to the detriment of native grasses and perennial forbs. If BLM does not want to reduce the AUMs accordingly, a better solution would be livestock removal from sagegrouse ranges in the spring.	All	Both	emc0197GB

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202.	The economic aspect related to any proposed action relating to sage grouse must be carefully taken into account and goes far beyond the cost of administration. Proposals have been tabled by some parties to severely limit or eliminate commercial grazing. This would have a devastating effect on many western cattle ranching and an equally devastating effect on rural communities and counties.	All	Both	emc0200GB
203.	Therefore, I strongly urge the agencies to recognize the benefits of livestock grazing to greater-sage grouse and to prioritize their focus on those issues that pose a real and specific threat to the greater sage-grouse and its habitat.	All	Both	emc0202GB
204.	Livestock grazing represents a legal and valid use of public.	All	Both	emc0202GB
205.	NEPA analysis should start from the premise that properly managed grazing can be a benefit to sage-grouse and properly managed grazing should be incorporated into the sage-grouse management strategy.	All	Both	emc0202GB
206.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the econoimic viability of ranching operations.	All	Both	emc0202GB
207.	Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations.	All	Both	emc0202GB
208.	I am extremely concerned about the impact the above referenced Notice of Intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities. The conservation of rangelands for livestock production is extremely important, not only to the sustainable production of food and fiber for the United States and worldwide markets, but also to providing quality habitat to support wildlife populations. Scientific research indicates that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife. Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species	All	Both	emc0204GB
209.	Therefore, I strongly urge the agencies to recognize the benefits of livestock grazing to greater-sage grouse and to prioritize their focus on those issues that pose a real and specific threat to the greater sage-grouse and its habitat.	All	Both	emc0204GB
210.	NEPA analysis should start from the premise that grazing can be a benefit to sage-grouse and grazing should be incorporated into the sage-grouse management strategy.	All	Both	emc0204GB
211.	Historical evidence indicates a positive correlation between livestock numbers and sage-grouse populations	All	Both	emc0204GB
212.	On February 6, 2012 Judge Windmill indicated that actions such as fencing spring to prevent trampling by cattle were unacceptable , since they "ensure(s) that this potential critical habitat cannot be used by the sage grouse." The springs, that I have seen fenced off, were done with barbed wire and the sage grouse could go under or over the wire to get into the enclosure. Some of the very small ones 10 feet by10 feet are done just around the spring were done with woven wire or chicken wire still have hole that a sage grouse could get in. The excess water that does not get piped to the tanks and ponds comes out under the enclosures fence and produces green grass and mud for the insects to live in. I have never seen where a sage grouse has flown into a fence and gotten caught there.	All	Both	emc0207GB
213.	Common sense would dictate that if the sage chicken and mule deer numbers were at their zenith, so were cattle and sheep numbers. Historically cattle and sheep numbers were much higher than those that are allowed today. In just this area there were multiple bands of sheep, thousands of cattle and hundreds of domestic horses, and still the old timers tell of the sky	All	Both	emc0208GB

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	turning black with the chickens flying off their feeding grounds. It seems as though there is a trend that every time the cattle numbers fall so do those of the sage grouse. Even in the 1980's our cattle numbers were higher than they are at the present time and the chickens seemed plentiful. Although I can't say that I ever saw the sky turn black with them flying, it was quite common to see flocks of hundreds of birds come in to graze on the hay meadows in the evening. There is a bunch that still comes to graze on my lawn during the summer, which indicates to me that they are bothered very little by human development			
214.	Livestock grazing has very little if any detrimental impact on the sage grouse population. In fact, grazing seems to be beneficial to sage grouse. The grouse typically follow around where livestock have been grazing, which allows the birds to find insects and eat the tender new growth of the shrubs and forbs. I have never noticed any conflict between cattle and sage grouse, I have driven a herd of cattle with-in yards of grouse strutting and they did not even notice us passing. I have never seen a sage grouse that has been trampled or killed by a cow, horse or sheep.	All	Both	emc0208GB
215.	Livestock grazing has consistently and adequately been managed over the last 50 years. Any references to "past grazing" impacts to the landscape should be limited unless the EIS can identify and quantify specific impacts that remain in the present time. The use of "historical grazing impacts" as a way to excuse the lack of current data and quantification through inventory collections is unacceptable as a way to judge how the sage grouse management can or cannot proceed. The EIS should recognize ways to provide for studies in the plan that take the steps necessary to gain knowledge and understanding for development of a road map for future activities. This may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.	All	Both	emc0209GB
216.	Lands suitable for grazing should continue to be designated for managed livestock grazing systems since adaptive management techniques are a major part of each grazing area and monitoring has been used to support the objectives of each plan. The preferred alternative in this EIS should include assessments of the benefits and positive attributes of healthy, actively growing grassland conditioned during the last 50 years using livestock grazing management. Solutions to problem areas should be written with the perspective that livestock grazing can be curtailed when needed through adaptive management techniques and not through elimination of animal use. The EIS should weigh the benefits of grazing where grasslands are a major component of the landscape. Rangeland vegetation benefits from grazing use and bunch grasses are invigorated by all herbivore use. Livestock grazing is an asset and is supported in science literature through rigorous, repeatable research studies which are superior to the speculative interpretations in gray literature.	All	Both	emc0209GB
217.	There are few scientific, peer-reviewed articles that address the grazing and sage-grouse issue, none that are designed experiments, and none with replicates. Most of what is available reflects conclusions or thoughts without empirical data, or it represents gray literature (Wambolt et. al, 2002).	All	Both	emc0209GB
218.	Implementation of a top down BLM solution for BLM managed land that prohibit or prevent proper grazing management by other land managers will be counterproductive.	All	Both	emc0212GB
219.	The BLM has noted in their handout (Preliminary Planning Criteria) the LUP amendments will contain decisions that are allocative andlor prescriptive to conserve sage-grouse habitat and management actions to restore, enhance and improve sage-grouse habitat. The BLM has developed Rangeland Health Standards and Guidelines that have standards that address	All	Both	emc0212GB

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	uplands ecosystems and species that are sensitive, threatened or endangered. I believe that the BLM has regulatory mechanisms to management livestock grazing on BLM through the Rangeland Health Standard and Guidelines procedures that have already been incorporated in existing LUPs. BLM is required by regulation to make adjustment to livestock grazing permit when it has been determined that livestock is the cause for a standard not being met. This existing process of amending LUPs should be very limited when addressing changes to livestock grazing on BLM lands.			
220.	The conservation of rangelands for livestock production is extremely important, not only to the sustainable production of food and fiber for the United States and worldwide markets, but to wildlife habitat as well. Scientific research indicates that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife. Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive weeds.	All	Both	emc0215GB
221.	Therefore, I strongly urge the agencies to recognize the benefits of livestock grazing to greater-sage grouse and to prioritize their focus on those issues that pose a real and specific threat to the greater sage-grouse and its habitat.	All	Both	emc0215GB
222.	Livestock grazing is a valid use of public rangelands and is a vital component of my livelihood.	All	Both	emc0215GB
223.	Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations	All	Both	emc0215GB
224.	NEPA analysis should start from the premise that properly managed grazing is a benefit to sagegrouse and properly managed grazing should be incorporated into the sage-grouse management strategy.	All	Both	emc0215GB
225.	Since BLM lands have historical grazing rights attached to them, every effort should be made to accommodate the existing lease holder with comparable grazing opportunities or allow them to trade for or purchase the land.	All	Both	emc0217GB
226.	Livestock grazing has consistently and adequately been managed over the last 50 years. Any references to "past grazing" impacts to the landscape should be limited unless the EIS can identify and quantify specific impacts that remain in the present time. The use of "historical grazing impacts" as a way to excuse the lack of current data and quantification through inventory collections is unacceptable as a way to judge how the sage grouse management can or cannot proceed. The EIS should recognize ways to provide for studies in the plan that take the steps necessary to gain knowledge and understanding for development of a road map for future activities. This may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.	All	Both	emc0222GB
227.	Lands suitable for grazing should continue to be designated for managed livestock grazing systems since adaptive management techniques are a major part of each grazing area and monitoring has been used to support the objectives of each plan. The preferred alternative in this EIS should include assessments of the benefits and positive attributes of healthy, actively growing grassland conditioned during the last 50 years using livestock grazing management. Solutions to problem areas should be written with the perspective that livestock grazing can be curtailed when needed through adaptive management techniques and not through elimination of animal use. The EIS should weigh the benefits of grazing where grasslands are a major component of the landscape. Rangeland vegetation benefits from grazing use and bunch grasses are invigorated by all herbivore use. Livestock grazing is an asset and is supported in science literature through rigorous, repeatable research studies which are superior to the speculative interpretations in gray literature.	All	Both	emc0222GB

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228.	There are few scientific, peer-reviewed articles that address the grazing and sage-grouse issue, none that are designed experiments, and none with replicates. Most of what is available reflects conclusions or thoughts without empirical data, or it represents gray literature (Wambolt et. al, 2002).	All	Both	emc0222GB
229.	The Instruction Memorandum states that "enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." Well managed public land with respect to multiple use helps to provide better public land health which in turn would help to improve sage grouse habitat.	All	Both	emc0233GB
230.	When droughts occur, there should be an evaluation of "season of use and stocking rates and adjustments through coordination and annual billings processes". If grazing has been properly planned there should be plenty of grass in the bank to carry grazing through drought periods. Any science based grazing management plan should allow for such insurances during drought periods where livestock will always be considered as a "tool" to manage rangelands and habitat for sensitive species like sage grouse.	All	Both	emc0233GB
231.	The IM talks about prioritizing supervision and effective monitoring of grazing activities to ensure compliance. We would suggest that monitoring be planned by federal, state and local officials around grazing principals assessed over land scape scaled areas and not be tied to specific locations only.	All	Both	emc0233GB
232.	The IM doesn't mention the benefits that can be obtained by using multiple grazing species to achieve desired vegetation conditions for Sage-Grouse. An example would be winter grazing with sheep to enhance sagebrush. Well managed sheep grazing provides for greater sagebrush health.	All	Both	emc0233GB
233.	We agree that several reasonable alternatives should be analyzed in each NEPA document prepared dealing with grazing practices. WCA suggests that two alternatives be considered. These two alternatives would include a deferred or rest-rotation grazing system. Lin rural counties of the Western United States, the effect of a no-grazing alternative would be devastating to the local customs/culture/economics with a great multiplying effect.	All	Both	emc0233GB
234.	Prescriptive grazing should be considered as the priority tool for use in increasing and establishment of habitat for sage grouse. The method of monitoring should be flexible enough to allow local input and modifications on the adaptivity of the species. Range improvements that benefits species and maintained by permittees who hold Federal Range Maintenance Agreements should be allowed mitigation credits.	All	Both	emc0233GB
235.	I am writing to express my concern about the sage grouse and its potential impact on public land grazing by livestock. To my understanding, there is no conclusive evidence that livestock grazing is detrimental to sage grouse.	All	Both	emc0236GB
236.	In my own experience, I have seen many cases where sage grouse actually choose to be near cattle, presumably as a defense mechanism against predators and scavengers.	All	Both	emc0236GB
237.	The necessary and productive grazing industry should not be made a sacrificial lamb when many such factors have effect on the sage grouse populations.	All	Both	emc0236GB
238.	The positive effects of livestock grazing sage grouse habitat are many, from the grazing and subsequent regrowth of plant life, to the natural process of seeds being scattered via livestock. Livestock contributes to the health of sage grouse habitat, and grazing permit holders do as well, with the maintenance and development of water resources. Allowing lands to lie dormant for too long creates nothing but tangled overgrowth of no nutritional value.	All	Both	emc0236GB

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239.	The result I have seen has been that native wildlife, especially birds, choose to be nearer to the cattle across the fence in the grazed area, rather than the "preserved" land.	All	Both	emc0236GB
240.	Livestock grazing of public lands is unique in that it converts a product unusable by humans (grass), to a product that is consumable by humans (meat), in an all natural, environmentally sound manner. Careful, balanced management of public lands grazing is of course central to the success of the multiple use ideal.	All	Both	emc0236GB
241.	Keeping food production safe and sustainable leads to a safe, plentiful, and affordable food supply for our nation and the world community. Public land grazing is an integral part that, and the dubious status of the sage grouse should not preclude that.	All	Both	emc0236GB
242.	I would like to express my concern that currently grazing is potentially going to be sacrificed for sage grouse.	All	Both	emc0237GB
243.	Being a life-long rancher, I've heard many similar comments come and go. Grazing and livestock always seeming to be the at-risk potential sacrificial lamb. I've watched areas where livestock graze and it well known that where livestock graze, many other species flock. Yes, grazing cattle is a BENEFIT to sage grouse.	All	Both	emc0237GB
244.	Look at areas where grazing has not been allowed. The tall dry grasses not only pose a fire danger, but when the dry grasses are fed off, you will see an increase in other game. Other birds, including the sage grouse, actually hang in areas where livestock have grazed. It has been proven that elk follow livestock grazing. Thus, by creating a thriving environment where cattle are grazed, other species follow and create a balanced ecosystem.	All	Both	emc0237GB
245.	We all know that where livestock are grazed, the owners help to develop water sources. No specie can live without water. By maintaining a healthy and active water source, sage grouse along with other game bird species have a viable habitat.	All	Both	emc0237GB
246.	Considering that livestock provides many goods and services to the entire human population, not just food, but through other by-products, it is a shame to see environmental activists attempt to manipulate grazing and negatively impact the cattle industry through their lack of sense.	All	Both	emc0237GB
247.	It appears to be a common misconception that ranchers who use public land allotments for grazing are somehow getting that grazing for free or that they are not a part of the "public." Since ranchers actually are a part of the taxpayer base and provide a vital resource for all Americans and other countries for that matter, the BLM should say no to the groups attempting to use sage grouse as a pawn to run grazing off public lands. Whether it is sage grouse or any other specie, grazing is good for the environment and good for our nation.	All	Both	emc0237GB
248.	Support grazing.	All	Both	emc0237GB
249.	I am writing to express my concern about the sage grouse and its potential impact on public land grazing by livestock. My understanding is that there is no conclusive evidence that livestock grazing is detrimental to the sage grouse habitat.	All	Both	emc0238GB
250.	The sage grouse are being used as a pawn by extremist environmental groups to stop public use of lands, and the very beneficial grazing by livestock.	All	Both	emc0238GB
251.	On page 14, Range Management, only negative aspects of herbivory are listed, yet there is scientific evidence that grazing can improve nutrition of sage-grouse food items, that sage-grouse prefer grazed meadows over ungrazed meadows, and in areas dominated by grasses and widely spaced shrubs, grazing can be an effective fuels management tool. These seem like conservation measures that should also be used to benefit sage-grouse and they should be included in the EIS analysis.	All	Both	emc0239GB

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252.	On page 17, Retirement of Grazing Privileges, the planning note at the bottom of the page indicates that BLM and USFS will target specific allotments for permanent retirement of grazing privileges. The authority for this use of BLM and USFS action needs to be identified in the EIS and the socio-economic impacts of this type of action need to be analyzed in the EIS.	All	Both	emc0239GB
253.	Changing grazing patterns with intent to increase Sage Grouse habitat will in fact cause detriment to other species that are both wild and domestic in nature. It will also threaten grazing permits due poor grazing systems. Forcing aggressive management of Sage Grouse habitat, will in fact threaten access for business use.	All	Both	emc0240GB, emc0096RM
254.	Increase grazing by cattle, sheep, and horses to bring the over abundant fuel load of cheat grass and other non-native species of plants down to end the danger of catastrophic wildland fires. Managed and rotated grazing has beneficial effects for the sagegrouse by removing woofy dead grasses and stimulating softer forages.	All	Both	emc0241GB
255.	Increase grazing by cattle, sheep, and horses to bring the over abundant fuel load of cheat grass and other non-native species of plants down to end the danger of catastrophic wildland fires. Managed and rotated grazing has beneficial effects for the sagegrouse by removing woofy dead grasses and stimulating softer forages.	All	Both	emc0241GB
256.	Rangeland management must recognize the beneficial aspects of grazing in sustaining rangeland health and the rangeland improvements that have been made through the coordinated efforts of BLM managers and grazing permittees. Rest-rotation grazing systems should be considered rather than no-grazing alternatives.	All	Both	emc0242GB
257.	Cattle ranching is a mainstay of Nevada (the state most heavily impacted by the threatened sage grouse), and the livelihoods of thousands of American citizens could be extinct due to the restrictions placed on ranchers by the Interim Policy.	All	Both	emc0244GB
258.	Copy of the policy guidelines call for reduction of livestock grazing on public lands. Historically, sage grouse and other species such as antelope have followed livestock grazing patterns and flourished where ranchers are allowed to care for the rangeland	All	Both	emc0244GB
259.	Limiting ranchers' ability to develop water sources for fear of increasing mosquitos that might carry West Nile is counteractive to increasing sage grouse numbers. Lifting restrictions and allowing ranchers to develop water sources, fence and protect meadows, and allowing regulated shooting of the raven would help boost sage grouse numbers.	All	Both	emc0244GB
260.	Cooperative conservation measures should focus on restoration of rangelands that have been negatively affected by catastrophic fires, along with well-designed and well-managed grazing plans.	All	Both	emc0247GB
261.	With proper management, grazing is a beneficial tool to rangeland health, removing overgrown grasses to expose fresh green grass, developing and maintaining watering sources, and keeping the rangeland in a productive grazing system rather than being developed for other uses are all beneficial to sage-grouse.	All	Both	emc0247GB
262.	Structural Range improvements: Water infrastructure and fences to manage livestock can pose increased mortality risk to sage grouse. Within the boundaries of the ACEC, development or modification of water infrastructure should be done in a way that minimizes the potential propagation of West Nile virus. (SGNTT 2011). Existing and new fencing should be marked, modified or removed to reduce sage-grouse strikes and mortality, particularly near leks, in known flight paths, in concentrated winter range, or where fence strikes have been documented.	All	BLM	emc0248GB
263.	Livestock grazing contributes positively to the stated primary principles of the strategy, being both compatible with and beneficial to greater sage-grouse habitat conservation. Ranchers are the stewards of the greater sage-grouse habitat on both	All	Both	emc0248GB

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	the private and public land they use. Without ranchers, who provide an effective line of defense against fire and noxious weeds, who manage forage for optimum production, and who are the primary protectors of open space in the private lands of the west, large areas of greater sage-grouse habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified threats to greater sage-grouse habitat, including wildfire, invasive plants, and urbanization and development			
264.	Let us instead go back to the practices that helped the birds flourish. These are agriculture and grazing and a vigorous program to control predators such as crows, ravens and coyotes.	All	Both	emc0249GB
265.	There is ample greater sage-grouse habitat within existing Wilderness Areas, National Wildlife Refuges, National Parks, and National Conservation Areas to support the minimum effective population of 5,000 breeding adults needed to safeguard the species against extinction. These nationally designated areas are already managed under special regulatory mechanisms that in many instances mirror the proposed mechanisms that current sage-grouse planning strategies recommend for conservation of the species and its habitat. Thus, the proposed EIS process must first analyze greater sage-grouse populations and trends in these nationally designated areas. If analysis of these nationally designated areas, which likely support more than 5,000 sage-grouse, shows that the regulatory mechanisms currently in place have maintained or increased such populations, then there is no need to implement additional conservation measures anywhere else in the bird's occupied range because its existence and trend in these nationally designated areas provide sustainable populations to avoid any need for listing under the ESA. In contrast, if analysis shows that sage-grouse populations have declined in these nationally designated areas, like they have elsewhere in their currently occupied range, then the entire line of reasoning regarding the factors responsible for the decline must be reevaluated. If sage-grouse have declined in these nationally designated areas despite the regulatory mechanisms that constrain their use, all recommendations to implement similar regulatory/policy restrictions across vast additional portions of the species range need to be rejected entirely. Instead, management practices that were in place when greater sage-grouse populations dramatically increased from the mid 1800s to early 1900s need to be identified and implemented again, including increased livestock grazing to reduce fire fuel loads and wildfire impacts, as well as concerted predator control.	All	Both	emc0251GB
266.	Indeed, human disturbances of all sorts, roads, railways, fences, reservoirs, towns, homesteads, farms, mines, etc. flourished in the early to mid 1900s, and so did the sage-grouse. The mere presence of human activity seems to have little biologically relevant connection to sage-grouse population trends. However, specific human activities appear to correlate positively with GSG population trends. Livestock grazing management, with its associated intensive development of meadows, hayfields, and surface water sources increased markedly in the Great Basin in the late 1800s and early 1900s, and GSG populations boomed. During this period, high livestock densities (both sheep and cattle) reduced fine wildfire fuel loads across the Great Basin, and wildfires were rare and small. High densities of livestock dung also supplied an abundance of insect activity, particularly in closely grazed meadows and riparian areas, and the close grazing stimulated succulent new herbaceous growth and increased the forb component in these meadows and riparian areas, thereby increasing the quantity and quality of the forage supply for sage-grouse. At the same time, concerted predator control was practiced. In fact, predator control was encouraged, subsidized, and implemented on a vast scale by the Federal and State governments. By the mid 1900s, Federal and State regulations were implemented and all of the grazing management practices discussed above were controlled and	All	Both	emc0251GB

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	moderated. The GSG population boom moderated at about the same time. By the late 1960s, livestock numbers and grazing levels were significantly scaled back across the west, and predator control programs were largely curtailed. Fire fuel levels increased, and the incidence of large-scale wildfires rose exponentially. GSG population trends reversed and started to rapidly decline.			
267.	Thus, intensive livestock management which diminished the frequency and size of wildfires, and concerted predator control which greatly reduced GSG loses to these killers, are management actions in the Great Basin that seem to be highly relevant to the biology of the GSG and help explain the trajectory of their populations over time. As shown in Figure 1 on page 17 herein, it is reasonable to assume that a return to effective management to increase livestock grazing levels, reduce fire fuel loads and wildfire impacts, and increase predator control would result in another significant upward trend in GSG populations. In contrast, proposed GSG conservation measures to provide heavier cover levels through further livestock grazing reductions, and the lack of conservation measures to address ever increasing predation levels, are a prescription to assure that GSG populations will ultimately decline. Heavier cover for GSG translates to higher fire fuel loads across the landscape, and substantial fuel loads make large-scale wildfires inevitable in many sagebrush communities. Repeat burns increase the likelihood that plant communities will shift toward cheatgrass dominance, which in turn increases wildfire frequency, eliminating the ability of sagebrush communities to re-establish. Thus, conservation measures that intend to benefit GSG by providing them with more hiding cover will ultimately harm the species by converting significant swaths of existing habitat to annual grasslands that provide no habitat value for GSG. This will concentrate the remaining birds in an ever shrinking area, making them more vulnerable to poorly controlled predator populations	All	Both	emc0251GB
268.	Thus, intensive livestock management which diminished the frequency and size of wildfires, and concerted predator control which greatly reduced GSG loses to these killers, are management actions in the Great Basin that seem to be highly relevant to the biology of the GSG and help explain the trajectory of their populations over time. As shown in Figure 1 on page 17 herein, it is reasonable to assume that a return to effective management to increase livestock grazing levels, reduce fire fuel loads and wildfire impacts, and increase predator control would result in another significant upward trend in GSG populations. In contrast, proposed GSG conservation measures to provide heavier cover levels through further livestock grazing reductions, and the lack of conservation measures to address ever increasing predation levels, are a prescription to assure that GSG populations will ultimately decline. Heavier cover for GSG translates to higher fire fuel loads across the landscape, and substantial fuel loads make large-scale wildfires inevitable in many sagebrush communities. Repeat burns increase the likelihood that plant communities will shift toward cheatgrass dominance, which in turn increases wildfire frequency, eliminating the ability of sagebrush communities to re-establish. Thus, conservation measures that intend to benefit GSG by providing them with more hiding cover will ultimately harm the species by converting significant swaths of existing habitat to annual grasslands that provide no habitat value for GSG. This will concentrate the remaining birds in an ever shrinking area, making them more vulnerable to poorly controlled predator populations	All	Both	emc0251GB
269.	If regulatory/policy controls to minimize human disturbance have failed to allow GSG populations to flourish within the vast wilderness areas and other nationally designated conservation areas, then it is unreasonable to apply such draconian control measures to broad landscapes beyond the boundaries of these areas in the vain hope that such regulation will somehow work in other locations. To implement regulatory mechanisms that are certain to severely interfere with other valid existing	All	Both	emc0251GB

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	uses of the landscape and negatively impact local and regional economies in the face of evidence that such mechanisms did not reverse the plight of the GSG in these nationally designated areas would be unreasonable, irrational, and counter-productive. Instead, if the minimum effective population of GSG necessary to protect the species from extinction cannot be supported within such nationally designated areas, then management practices that were in place when greater sage-grouse populations dramatically increased from the mid 1800s to early 1900s need to be identified and implemented again in other areas, including increased livestock grazing to reduce wildfire fuel loads, and concerted predator control practices			
270.	Enhance Current Populations Alternative Given the fact that current GSG populations exceed the minimum effective breeding population by 70 to 107 times, it is clear that GSG are not at imminent risk of extinction, and therefore do not legally qualify for listing as "endangered" under the ESA. The FWS Findings express concerns regarding rapidly declining GSG populations between the late 1960s and late 1980s, and continued downward population trends (although at a slower rate) from the late 1980s to the present. The FWS Findings fret that such downward trends in GSG populations may threaten the species with extinction at some point in the future. Given the recent (1985 – 2007) rate of decline of 1.4% annually (FWS Findings, 3 page 13922), it would take 300 to 330 years for the current greater sage-grouse population (350,000 to 535,000 birds) to shrink to the minimum effective population (as high as 5,0000 birds). Theorizing about what might happen three centuries from now reaches well beyond the foreseeable future. Thus, the FWS Findings expression of concern about long-term outcomes from the continuation of recent GSG population trends does not rise to a determination that the species is threatened with extinction in the foreseeable future. A concern that populations may reach levels small enough to put them at risk of extinction at some point in the future does not meet the legal requirement to allow listing under the ESA unless the risk is likely in the foreseeable future. Given current circumstances, any such risk for GSG is likely 300 or more years distant, so the species does not legally qualify for listing as "threatened" under the ESA at this time. Nevertheless, it is reasonable to consider an alternative that would facilitate an increase in GSG populations, so long as that alternative does not negatively impacting existing socioeconomic uses occurring on BLM and FS administered lands. An analysis of the past management history within the Great Basin indicates that GSG flourished when livestock grazing levels were significantly higher than they are now. During this same period, large wildfires in the region were very infrequent (likely due to lower wildfire fuel levels as a result of close grazing), and concerted predator control measures were practiced. These management actions could be put into practice again to benefit GSG without harming the existing socioeconomic climate, but rather enhancing it. In fact, it is reasonable to argue that the FWS Findings get it wrong when they conclude that there is a lack of regulatory mechanisms in place to protect the GSG. Instead, many of the regulatory mechanisms currently in place are harming the species. For example, regulations restricting livestock numbers and use levels increase fire fuels across the Great Basin, and these regulations have resulted in a dramatic increase in large wildfires in the region in recent decades, which has destroyed GSG habitat to the detriment of the species. Repeated fire has led many sagebrush communities to convert to cheatgrass dominance, which assures that the habitat will remain unfit for GSG into the foreseeable future. Rules restricting predator control, regulating the use of poisons and baits, and protecting ravens have resulted in excessive GSG loses due to predation. Whenever a species like the GSG with a relatively low reproduction rate (FWS Findings, 3 page 13916) loses the vast majority of its eggs to predation, and can trace more than 80% of the mortality of those individuals that	All	Both	emc0251GB

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	manage to hatch to predation (FWS Findings, 3 pages 13930, 13971, and 13972), its populations can be expected to decline. Again, it appears that existing rules are harming GSG populations, not a lack of adequate rules.			
271.	It is reasonable to analyze an alternative to eliminate existing regulatory/policy mechanisms that are harming GSG, or replace them with rules that again implement management practices that allowed the species to rapidly increase in the past, at least within the Great Basin. Because current GSG populations greatly exceed the minimum effective population, any management alternative that would stabilize or increase the current population level would eliminate any perceived justification to list the species under the ESA. However, given the multiple-use mandates applicable to BLM and FS administered lands, consideration and analysis of such an alternative to help GSG populations is only reasonable if it does not negatively impact other valid existing uses. An alternative to increase livestock grazing to reduce fuel loads and minimize wildfire impacts, and to return to concerted predator control practices is reasonable because it would benefit GSG without harming the existing socioeconomic climate, but rather enhancing it	All	Both	emc0251GB
272.	COMMENTS ON Interim conservation Measures and Policies for Preliminary Priority Habitat, No. 2012 -043(IM) interim policy and program guidance in the IM: These comments are consistent with and applicable to the strategic suggestions above for the proposed action. Grazing For Proposed Authorizations and Renewals where current livestock grazing has been identified as causal in not achieving land health standards that have the potential to impact Greater Sage Much of the language in this section only requires interdisciplinary teams to assess conditions and to evaluate progress. It seems that if livestock grazing has a known negative impact to Greater Sage opportunity to reduce or restrict future livestock grazing through the authorization process, then the IM Greater Sage adequate mitigation in future authorizations.	All	Both	emc0254GB
273.	As far as the comments about fencing being a problem, lets understand that larger birds of prey use fence post as a place to eat their meals.	All	Both	emc0267GB
274.	Fences are a huge problem for sage grouse. Studies have shown that every mile of barbed-wire fencing causes a certain number of sage-grouse deaths, every year, due to sage-grouse hitting the wires. This is a continuous loss to the population. Yet the BLM (and the Forest Service, for that matter) continue to build more fences. The only reason for building more fencing is to attempt to influence the movements and reduce the damage caused by livestock. The option of reducing or eliminating livestock use of the public's lands is seldom considered. Sometimes "jack-leg" fencing is used in place of barbed-wire fencing. While wooden fences do not kill sage-grouse, sage-grouse are still threatened by them, as raptors use them as places to perch and pounce on passing prey. Also, cattle use fence-lines as trails, and these wide trails are also used by coyotes, foxes, and other predators, thus making it easier for them to nab sage-grouse chicks.	All	Both	emc0268GB
275.	Reduced availability of forbs and insects -- the latter a high-protein food that chicks must have -- are caused by the yearly stripping of vegetation from an area by livestock. Sage-grouse need to eat, but they are literally being starved to death because the biomass that they need simply is not available in many places. Many areas under BLM management are grazed from May to October, every single year. This level of use does not allow native vegetation to recover. When I walk through these areas, I see much bare ground, which encourages the invasion of cheatgrass and knapweed, the seeds of which are	All	Both	emc0268GB

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	carried by livestock and vehicles. These then spread if there is a wildfire. But livestock grazing was the beginning of the problem.			
276.	In the memory of older ranchers, many more cattle and sheep grazed the range lands than are allowed to today due to the many restrictions placed on ranchers. During this time, there were also many more sage grouse. At that time, grazing kept wild fires from destroying millions of acres of wildlife habitat. Fires have become a devastating problem in recent times, due to drastically restricted grazing and a huge build-up of un-used forage that creates fuel for these massive fires. Not only do fires destroy the necessary habitat and coverage for the nesting areas, they also kill any birds or wildlife in their path. A less restrictive approach to livestock grazing would greatly aid in saving the lands that the sage-grouse live on as well as all other animals that use the areas as well.	All	Both	emc0273GB
277.	2.7. Grazing Grazing receives five pages of summary discussion, much of which seems to stand in contrast to pioneer records, ranchers' histories and current resident witness to sage grouse life cycle, habit and extent. The discussion does not reflect the measured and diligent statement of Nevada Assemblyman Ira Hansen (2011). One correlation which must be considered is that the relatively high sage grouse population counts from the 1920s through the 1950s were contemporary with extensive grazing of both cattle and sheep (Barr, 2012a, Steninger & Barr, 2012). Additionally, there was concerted predator control encouraged and sanctioned by the government.	All	Both	emc0274GB
278.	As the National Technical Team indicated, historic grazing management has contributed to lower numbers of sage-grouse across the range.12 Livestock grazing is the most widespread use of sagebrush lands across the West, and most sagebrush habitats have been grazed by livestock repeatedly during the past century. Livestock grazing exerts repeated pressure on the landscape, and can affect soils, vegetation, and animal communities. Livestock consume or alter vegetation, redistribute or disturb nutrients and plant seeds, trample soils and sagebrush plants, alter water availability, and impact microbiotic crusts.	All	Both	emc0276GB
279.	By consuming or trampling native grasses, livestock may reduce canopy cover considered necessary for successful nesting and brood-rearing of sage-grouse. Similarly, several authors have noted that livestock grazing can reduce the suitability of habitat for breeding, nesting, and brood-rearing. If breeding is successful, livestock has the potential to trample nests, thus negatively affecting sage-grouse populations. Although the effect of trampling at a population level is unknown, outright nest destruction has been documented and the presence of livestock can cause sage-grouse to abandon their nests, exposing eggs to an increased risk of predation.	All	Both	emc0276GB
280.	Livestock and sage-grouse may also end up in direct competition for rangeland resources. Although livestock generally prefer to feed on grasses, cattle will nevertheless make seasonal use of forbs and shrub species such as sagebrush. Domestic sheep also may use forbs and shrub species like sagebrush. In addition to consumption of sagebrush reducing canopy cover, this particular impact may disproportionately affect pre-laying hens that require essential calcium, phosphorus, and protein found provided by forbs.	All	Both	emc0276GB
281.	Livestock grazing also causes numerous indirect effects that can negatively impact sage-grouse. For example, in addition to direct competition with sage-grouse for rangeland resources, livestock may also create similar competition for other species such as mule deer, white-tailed deer, elk, pronghorn, and bison. This competition may alter the distribution of these species, which may be particularly important when management for one species is in potential conflict with sage-grouse. One example would be the removal of sagebrush for improvement of elk range. Additionally, livestock can often indirectly spread	All	Both	emc0276GB

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	invasive species or weeds, such as cheatgrass, which can negatively impact sagebrush survival and alter the fire-risk of an ecosystem			
282.	Infrastructure often associated with livestock can also cause negative impacts to sage-grouse. Fencing, for example, in addition to directly modifying the landscape, can cause direct mortality to sage-grouse due to collisions. Additionally, fencing can influence livestock and predator movements, creating the number and density of perches for raptors and creating predator corridors. Fencing can also facilitate the spread and success of exotic plants. Sources state that more than 1,000 kilometers of fences were constructed each year from 1996 through 2002, mostly on lands in Montana, Wyoming, Nevada and Oregon. Fencing of this extent seriously fragments habitat for sage-grouse, denying grouse the continuous sagebrush habitat that they need to survive.	All	Both	emc0276GB
283.	Additionally, sagebrush lands used for grazing often are subject to unnatural habitat modifications, including prescribed fire and herbicide use. These alterations are generally used to eradicate sagebrush to create more grass for domestic livestock. Additionally, water provided for livestock can become incubators for West Nile virus, the biggest disease threat to sagegrouse. Water troughs may also cause direct mortality through drowning when escape ramps are not provided. Development of springs and other water sources to support livestock can also artificially concentrate domestic livestock and wild ungulates in important sage-grouse habitats, thereby exacerbating grazing impacts in those areas.	All	Both	emc0276GB
284.	Additionally, sagebrush lands used for grazing often are subject to unnatural habitat modifications, including prescribed fire and herbicide use. These alterations are generally used to eradicate sagebrush to create more grass for domestic livestock. Additionally, water provided for livestock can become incubators for West Nile virus, the biggest disease threat to sagegrouse. Water troughs may also cause direct mortality through drowning when escape ramps are not provided. Development of springs and other water sources to support livestock can also artificially concentrate domestic livestock and wild ungulates in important sage-grouse habitats, thereby exacerbating grazing impacts in those areas.	All	Both	emc0276GB
285.	There are also several cumulative effects that must be considered. For example, livestock grazing in combination with drought and climate change can have a severe impact on sagebrush communities. Fire risk to sagebrush habitats may also increase, as livestock consume native vegetation and spread noxious weeds and invasive plants. And when grazing is combined with other disturbances, sagebrush habitats may experience greater shrub loss and increase the chances of the introduction and spread of cheatgrass compared to landscapes having a single source of disturbance.	All	Both	emc0276GB
286.	Exactly how and to what extent grazing may affect sage-grouse is relatively difficult to predict, and can vary greatly from landscape to landscape. Water developments and distribution of water sources can significantly influence movements and distribution of livestock, and thus grazing pressure may be unevenly distributed across the landscape of concern. Additionally, certain grazing systems encourage short, but intensive use by livestock, thus leading to more significant impacts over a shorter period of time.	All	Both	emc0276GB
287.	The importance and impacts of grazing pressure, rest, and rotation on the condition of sagebrush landscapes and the capability of these sagebrush habitats to support sage-grouse are not fully understood, largely due to a lack of research and experimentation. Also, impacts to sage-grouse may be different depending on which season and stage of life is being considered: breeding, nesting, brood rearing, or wintering.	All	Both	emc0276GB

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288.	Impacts from livestock grazing can be so great that the affected sagebrush system is often unable to be returned to an undisturbed state. This problem is compounded by the fact that restoration of sagebrush habitat by itself presents a challenge, and once alteration of vegetation, nutrient cycles, topsoil, and cryptobiotic crusts have exceeded recovery thresholds, restoration may be impossible. Even if restoration was more successful, however, true restoration efforts may take decades and thus often is considered cost-prohibitive.	All	Both	emc0276GB
289.	Fences will also cause similar adverse impacts to sage-grouse and sage-grouse habitat. Fences fragment habitat as sage-grouse seek to avoid areas close to fences, likely to avoid predation, as fences provide cover and perches for potential predators. Sage-grouse may also collide with fences, resulting in direct mortality. Finally, similar to powerlines and communication towers, fences threaten to spread invasive plants and noxious weeds, threatening the integrity of the habitat for sage-grouse.	All	Both	emc0276GB
290.	Finally, the agencies should determine what changes need to be made in domestic livestock grazing in priority sage-grouse habitat to protect such habitat, including decreasing grazing intensity, implementation of rotational grazing patterns, adjusting stocking rates, strategic placement of water troughs and other associated infrastructure, phasing out grazing permits, or prohibiting future grazing. Such measures are especially necessary in areas not meeting rangeland health standards. We agree with the Technical Team Report's suggestion to prioritize completion of land health assessments within priority sage-grouse habitat areas.34 When lands supporting sage-grouse or suitable sage-grouse habitat are not meeting rangeland health standards, grazing should be halted until the land is brought into compliance with those standards. Additionally, the agencies should reduce hot season grazing on riparian and meadow complexes to promote recovery or maintenance of appropriate vegetation and water quality.35 All NEPA analyses for AMP revisions for allotments in priority habitat should include at least one alternative that considers phasing out grazing in priority sage-grouse habitat. Each RMP should identify the specific allotments where permanent retirement of grazing privileges is potentially beneficial to sage-grouse.36 See infra Section III.C for more information on the impacts associated with grazing.	All	Both	emc0276GB
291.	Where domestic livestock grazing continues in sagebrush habitats, the agencies should develop and implement binding grazing management practices to protect the sagebrush ecosystem to the greatest extent possible. These standards should aim to maintain the soil quality and ecological processes necessary for a properly functioning sagebrush community to address long terms needs of sage-grouse and other sagebrush associated species. Particular emphasis should be placed on how grazing affects sage-grouse nesting and early brood-rearing habitat. Some authors suggest that impacts from grazing may be minimized where intensity of grazing is reduced. All RMPs or grazing management plans should include stipulations to document lek locations and avoid new sources of disturbance on lek sites, manage grazing to maintain a vigorous sagebrush community with adequate cover, avoid repeated grazing of riparian areas in seasons when temperatures are high, and ensure any winter grazing should avoid heavy use of herbaceous standing crop and avoid any levels of browsing on sagebrush that would limit sage-grouse access to their food supply and cover. The agencies should also address documented impacts to sage-grouse from grazing infrastructure. For example, water troughs can cause unnecessary mortality to sage-grouse. As required by BLM Instruction Memorandum No. 2007-179, escape ramps should be required in all water troughs/tanks. Furthermore, springs and seeps should be protected from livestock trampling. And in areas with documented West Nile Virus, plans should incorporate measures to minimize mosquito habitat, including minimizing areas of standing water with	All	Both	emc0276GB

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	emergent vegetation.			
292.	Barrick is the largest nongovemmentallandowner in Nevada. In addition to our mining projects, we own several large ranching operations in the northern part of the state, including the Tumbling JR, 7H, Dean, Squaw Valley, Hay, Dean, and JD Ranches. Our ranches also hold grazing allotments on more than a million acres of BLM land within the Ely, Elko, Shoshone-Eureka, Sonoma-Gerlach and Winnemucca districts, and on approximately 14,000 acres in the Humboldt National Forest Service. Despite their size, the ranches are dependent on these BLM and USFS grazing allotments for their long-term economic success. Without access to the allotments, the ranches would be unable to provide adequate revenue to remain sustainable.	All	Both	emc0277GB
293.	Barrick has conducted assessments of the ranches adjacent to some of its mining operations that may be useful to the agencies, particularly if the agencies are interested in evaluating the potential for mitigation projects or "banks" in these areas. These same type of assessments are being included in the baseline studies conducted on potential mine development sites. This information may be available for the NEPA analysis and may allow for determination of impacts and mitigation for the impacts. The existing information for the ranches provides guidance and opportunity for where off-site mitigation can be conducted within the vicinity of the impacts.	All	Both	emc0277GB
294.	The management plan revisions must comply with multiple use and sustained yield requirements BLM must also recognize "the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands." Id. § 1701(a)(12). And BLM must manage the public lands for a "sustained yield," requiring "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use." [d. § 1702(h). Mineral extraction, grazing, and other productive uses must be considered on equal footing with sage-grouse management, and not merely as an afterthought. The National Forest Management Act and the Multiple-Use Sustained-Yield Act require the Forest Service to similarly manage for mUltiple uses and sustained yield. Forest Service management plans must provide for "multiple use and sustained yield of the products and services obtained therefrom in accordance with the [Multiple Use Sustained Yield Act], and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish and wilderness." 16 U.S.C. § 1604(e). The Forest Service must recognize "the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes." Id. § 528. Accordingly, both the Forest Service and BLM must recognize multiple uses during the revision process.	All	Both	emc0277GB
295.	In addition to adhering to its long-standing multiple-use policy, the BLM must also analyze the economic impacts of the restriction of energy development and infrastructure as wel l as traditional uses such as grazing through the implementation of sage-grouse conservation measures. Many local and regional economics are dependent upon the multiple Ilses of the public lands and as such deserve a comprehensive economic evaluation of the economic impact of any large-scale, range-wide conservation measures.	All	Both	emc0278GB
296.	We have seen positive effects on rangeland function and GSG from strategic vegetative treatments when done in conjunction with time-controlled, rotational grazing (see below).	All	Both	emc0281GB
297.	Please remember these landscapes often provide essential habitat to multiple species-some of which require old-age	All	Both	emc0281GB

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	sagebrush canopies and others requiring early seral conditions. A well managed landscape is managed not to maximize value for any one specie (whether cattle or sage grouse) but rather maximizes overall value by 'optimizing', or maintaining viable habitat for multiple species (including wildlife and livestock, Danvir et al 2005).			
298.	Successful livestock operations plan at least one year in advance, and the most successful plan for contingencies such as drought. Reducing stocking rate during the first year of a drought can be devastating to producers, and is often marginally beneficial to the land. However, with advance notice and consultation, operators can generally find alternatives allowing them to reduce stocking rate in subsequent years of a multi-year drought, and especially during the first 'Normal" rainfall year following a drought.	All	Both	emc0281GB
299.	Resting pastures during a year with average or above average growing-season precipitation provides a better opportunity for plants to recover health (since they are actively growing) than rest during drought (as the plants are dormant). Please consider prescribing rest from drought in this manner, as to minimize economic hardship and maximize plant recovery.	All	Both	emc0281GB
300.	We have found that by implementing multi-pasture grazing systems, having 5-15 pastures per herd, large herds, large pastures, allowing adequateperiods for plant recovery (generally 12 or more months) and providing season long rest toapproximately 20% of pastures annually we see increased upland and riparian herbaceous vegetation and decreased bare ground while maintaining a healthy brush component (Danvir 2002, Danvir et al 2005).	All	Both	emc0281GB
301.	Cattle, mule deer, pronghorn, pygmy rabbits, sagebrush passerines, cutthroat trout and cattle can all thrive. This type of rotational grazing strategy (providing rest for recovery) meets all four rangeland health guidelines, and provides a 'drought reserve' in that if needed pastures planned to be rested season-long may be grazed late in the year (during dormancy) if drought occurs.	All	Both	emc0281GB
302.	Our observations on sagebrush rangelands throughout the GSG range has been that the best way to create healthy GSG habitat and meet rangeland standards is to graze right - by implementing rotational grazing whereby plants experience periodic defoliation in a relatively short time period (generally 1 month or less) followed by a period of adequate growing season rest from grazing for plants to recover. If properly implemented, this practice will increase herbaceous plant cover and litter at the expense of bare ground-increasing soil moisture and plant productivity.	All	Both	emc0281GB
303.	Conversely, reducing stocking rates without shortening the grazing period and lengthening the rest-recovery period does little to improve rangeland health, increases fire intensity, and will continue to harm some herbaceous plant species.	All	Both	emc0281GB
304.	We agree that poorly designed and placed fences kill wildlife and disrupt seasonal movements and migrations. All fences within 1.25 miles of known leks, or in heavily used winter concentration areas of GSG should be periodically monitored for signs of GSG collisions, and if so modified or visibly marked to reduce mortality.	All	Both	emc0281GB
305.	However, as described above, fences can provide time-control, and proper grazing can significantly improve rangeland function and GSG habitat, improving vital rates and increasing populations. If used properly, fence benefits to rangeland function outweigh the negative effects. Large herds and large pastures are preferential than small herds and small pastures from and economic and ecological perspective	All	Both	emc0281GB
306.	We are concerned that BLM not develop a 'one size fits all' GSG management strategy. We have experience with GSG range-wide, from the uplands of Nevada through the northern and central Rocky Mountains of Montana, Wyoming, Utah and Colorado and into the northern Great Plains of eastern Wyoming and Montana. The weather, soils, vegetation and	All	Both	emc0281GB

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	ecology of these areas varies across the range, and to a degree the GSG has adapted to this variation. Having spent the past 6 or more years working with Local Sage Grouse Working groups across the range, I (R. Danvir) have been impressed with the dedication, knowledge, insight and creativity expressed by the people who know these areas - their ability to identify stressors, threats and solutions to maintain or enhance GSG in their area. These local Working Groups included BLM biologists and range conservationists. The quickest way to lose the support of these hundreds of dedicated people is to disregard the hard work and existing GSG Local Working Group Conservation Plans already done. It is absolutely essential that BLM management henceforth recognizes and incorporates the work of the local working groups throughout the range of the GSG, and maintains their adaptive management approach			
307.	Reducing livestock numbers is not effective as a mitigation strategy, and would in fact be detrimental to greater sage-grouse habitat and, ultimately, sage grouse numbers. The EIS and SEIS revisions should clarify that grazing should be used to reduce the risk of catastrophic wildfire, improve forage, remove invasive species and provide open space.	All	Both	emc0284GB
308.	NEPA analyses should not start with the assumption that livestock grazing is a threat to sage grouse conservation in management areas. Instead, such analyses should start from the premise that properlymanaged livestock grazing is beneficial to greater sage-grouse, as scientific studies have shown. The analyses, therefore, must consider how to incorporate properly-managed livestock grazing into the protection strategy.	All	Both	emc0284GB
309.	Permitted livestock levels have dropped dramatically on BLM and FS lands from 1940 to today. Greater sage-grouse numbers have mirrored that decline. The agencies should not overlook this statistic.	All	Both	emc0284GB
310.	Managed livestock grazing programs have the potential to maintain habitat diversity and quality for greater sage-grouse. Site-localized, long-term trend monitoring should be the basis for determining compliance with management plans. Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the greater sage-grouse range, are not effective tools for adaptive management.	All	Both	emc0284GB
311.	Livestock grazing is one of the best tools to improve sage grouse habitat and reduce the danger of fire.	All	Both	emc0286GB
312.	please do not alienate the best tool available to protect Sage Grouse which is the grazing of livestock and the ranchers who depend on these lands for their livelyhoods.	All	Both	emc0286GB
313.	page IS, Implementing Management Actions after land health and Habitat Evaluations, bullet point 3, sub-point 2). Cattle numbers have declined 50% on the Public Lands. Sage-Grouse have also declined. Cattle are not the problem. We have learned to graze the land and leave grass for the wildlife.	All	Both	emc0289GB
314.	7. page 14, Range Management, bullet point I). Overgrazing can actualJy enhance sagebrush stands along with sagebrush longevity simply because there is no fine fuel to carry wildfires. SRCA does not advocate overgrazing, but it should be taken into consideration. Correlate grazing cuts since the mid 1970's with increased fires and the declining sage-grouse populations throughout Northern Nevada and Southern Idaho. (Hansen, 2012)	All	Both	emc0289GB
315.	9. page 14, Range Management, bullet point 3). Very rarely does nest trampling occur by livestock. This is why land managers and ranchers need to form partnerships to share information so that livestock concentration does not occur near nesting areas, (e.g. salting and watering areas).	All	Both	emc0289GB
316.	10. page 14, Range Management, bullet point 4). Is this behavior positive or negative? Before riparian areas were fcnced off,	All	Both	emc0289GB

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	it seemed the livestock and sage-grouse coexisted very well. Sage-grouse seemed to co-mingle with livestock in riparian areas. Maybe this is because predation could not occur around livestock. Sagegrouse had a sense of security around livestock. There were also more forbs and insects for sage-grouse in these riparian areas where livestock comingled with sage-grouse.			
317.	We agree there would be adverse impacts in eliminating grazing. These adverse impacts include invasive species after wildfires. Wildfires occurring where grazing did not occur would be very intense. The Murphy Complex Fire is a prime example. TNR was taken from this area several years ago which led to a devastating fire due to fuel buildup. How many acres of sagebrush burned? SRCA does not agree that permanent retirement of grazing privileges would ever be potentially beneficial.	All	Both	emc0289GB
318.	A blanket policy of resting for two full growing seasons can have adverse impacts. Short intense grazing could help reduce cheat grass infestations as well as other invasive species in some instances when done properl y. The lack of grazing is a threat to sage-grouse populations and sagebrush ecosystems. There is a correlation between grazing cuts (sheep and cattle), increased fires and decreased sage-grouse populations (see map 1). Livestock producers do realize the difference between proper and improper grazing. (Smith., Sheley, & Svejcar, 2012)(Frost et al ., 2012)(United States Department of Agriculture [USDA], 2006)	All	Both	emc0289GB
319.	Livestock grazing is a legal and valid use of public rangelands and is a vital component to the balance of nature. If one looks at the statistics, more rangeland has burned in the past 10-15 years because of the restrictions on the rangeland. If ranchers can't utilize the feed on BLM and Forest Service properties because of this sage-grouse issue, then it will be like adding fuel to an already burning fire. More vegetation will just make a bigger fire! Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations. Grazing keeps the fuel down so there isn't so much vegetation to burn. Sage-grouse don't like to live in burned out areas either. They prefer to live in an area where nature is balanced.	All	Both	emc0290GB
320.	Livestock grazing has been one of the most important factors in the population explosion seen during the mid 1900s. Any reduction of grazing will actually be detrimental to the birds habitat.	All	Both	emc0292GB
321.	The BLM states fire as the greatest threat to the birds and grazing is the most effective management tool that is available to help control fuels to prevent wildfires.	All	Both	emc0294GB emc0120rm
322.	Reduce livestock grazing in priority habitat and potential recovery areas to restore native plants that the sage grouse depend upon.	All	Both	emc0297GB
323.	We have been successful promoting this effort by finding conservation practices that will benefit the rangeland, and thus increase the sustainability of the ranching operation. Our slogan, "what's good for ranching is good for the grouse sums up this effort. It's a win-win program to conserve world class wildlife and sustainable ranching.	All	Both	emc0300GB
324.	From 2010-2011 NRCS Utah has planned and funded 23 SGI projects on 42,300 for approximately $2.6 million ~Every grazed acre has a NRCS prescribed grazing plan designed to improve habitat. We have planned to mark or remove over 10 miles of fences near leks and brood rearing areas to reduce collisions. Implementation of these projects is underway. 2012 projects are still being planned. In addition, we have secured conservation easements on nearly 15,000ac of sage grouse habitat. Numerous 2012 easement applications are being considered for funding.	All	Both	emc0300GB

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325.	The largest positive impact we have had in the last decade is working with private landowners on hundreds of thousands of acres of prescribed grazing through SGI and through other Farm Bill programs. On all prescribed grazing projects, NRCS provides land owners with a grazing plan designed to increase the amount of vegetation on the landscape.	All	Both	emc0300GB
326.	Since the 2008 Farm Bill, we have had the opportunity to plan and fund conservation projects on BLM-managed lands by working with the grazing leasee and the BLM. The use of this option has been limited thus far, but should be a priority for both of our agencies to explore the vast potential to get more conservation on the ground via this mechanism	All	BLM	emc0300GB
327.	The decrease in large fires associated by adequate grass grazing by cattle, and the stimulation of new herbaceous growth and increased forb component that grazing promotes.	All	Both	emc0301GB
328.	Measures that the BLM has the power to enact that will have the greatest benefit to sage grouse numbers are likely maintaining or increasing their access to reliable water sources, reducing wildfire number and severity, and increasing new herbaceous growth and forb diversity. Livestock grazing promotes all these aims.	All	BLM	emc0301GB
329.	We have seen positive effects on rangeland function and GSG from strategic vegetative treatments when done in conjunction with time-controlled, rotational grazing (see below).	All	Both	emc0303GB
330.	Page 7-"If periods of drought occur, where appropriate evaluate the season of use and stocking rate and adjust through coordination and annual billings processes." The BLM allotments and associated private lands in sagebrush country provide habitat for diverse wildlife species as well as providing the economic base for these rural counties. Successful livestock operations plan at least one year in advance, and the most successful plan for contingencies such as drought. Reducing stocking rate during the first year of a drought can be devastating to producers, and is often marginally beneficial to the land. However, with advance notice and consultation, operators can generally find alternatives allowing them to reduce stocking rate in subsequent years of a multi-year drought, and especially during the first 'Normal" rainfall year following a drought. Resting pastures during a year with average or above average growing-season precipitation provides a better opportunity for plants to recover health (since they are actively growing) than rest during drought (as the plants are dormant). Please consider prescribing rest from drought in this manner, as to minimize economic hardship and maximize plant recovery.	All	Both	emc0303GB
331.	Page 8- "Pursue opportunities to incorporate multiple allotments under a Single management plan/strategy where incorporation would result in enhancing Greater Sage-Grouse populations or its habitat as determined in coordination with respective state wildlife agency." We also agree with this strategy, are actively pursuing allotment consolidation projects in Utah, and are monitoring the effect on GSG vital rates and rangeland health response.	All	Both	emc0303GB
332.	We have found that by implementing multi-pasture grazing systems, having 5-15 pastures per herd, large herds, large pastures, allowing adequate periods for plant recovery (generally 12 or more months) and providing season long rest to approXimately 20% of pastures annually we see increased upland and riparian herbaceous vegetation and decreased bare ground while maintaining a healthy brush component (Danvir 2002, Danvir et al 2005).	All	Both	emc0303GB
333.	Cattle, mule deer, pronghorn, pygmy rabbits, sagebrush passerines, cutthroat trout and cattle can all thrive. This type of rotational grazing strategy (providing rest for recovery) meets all four rangeland health guidelines, and provides a 'drought reserve' in that if needed pastures planned to be rested season-long may be grazed late in the year (during dormancy) if drought occurs.	All	Both	emc0303GB

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334.	Our observations on sagebrush rangelands throughout the GSG range has been that the best way to create healthy GSG habitat and meet rangeland standards is to graze right - by implementing rotational grazing whereby plants experience periodic defoliation in a relatively short time period (generally 1 month or less) followed by a period of adequate growing season rest from grazing for plants to recover. If properly implemented, this practice will increase herbaceous plant cover and litter at the expense of bare groundincreasing soil moisture and plant productivity. Conversely, reducing stocking rates without shortening the grazing period and lengthening the rest-recovery period does little to improve rangeland health, increases fire intensity, and will continue to harm some herbaceous plant species.	All	Both	emc0303GB
335.	page 8 - "Fences". We agree that poorly designed and placed fences kill wildlife and disrupt seasonal movements and migrations. All fences within 1.25 miles of known leks, or in heavily used winter concentration areas of GSG should be periodically monitored for signs of GSG colliSions, and if so modified or visibly marked to reduce mortality. However, as described above, fences can provide time-control, and proper grazing can significantly improve rangeland function and GSG habitat, improving vital rates and increasing populations. If used properly, fence benefits to rangeland function outweigh the negative effects. Large herds and large pastures are preferential than small herds and small pastures from and economic and ecological perspective.	All	Both	emc0303GB
336.	Evaluate fencing in sage grouse habitat for its impact on grouse. Reduce the miles of fence near leks. Mark other fences to increase visibility.	All	Both	emc0305GB
337.	Quantify and verify the specific use and impacts to sage grouse habitat by domestic livestock (cattle, sheep, etc.) use, including grazing's promotion of invasive species and the resultant fire regime. Assess significance of grazing impacts relative to other sage grouse adverse factors, e.g. agriculture, wildfires, disease, energy development, and other anthropogenic disturbances. Ensure that each grazing allotment in sage brush habitat uses best management practices to ensure the protection of sage grouse.	All	Both	emc0305GB
338.	Include retirement of grazing allotments as an alternative method to protect sage-grouse habitat.	All	Both	emc0305GB
339.	Please do not insist on additional provisions in land use plans to further limit grazing management options. Standards and guidelines for livestock grazing and protocols for evaluating rangeland health are well established. Wild horse and burro use must be recognized in land use plans. Their grazing use must not exceed standards and guidelines and appropriate management levels must be adhered to.	All	Both	emc0307GB
340.	The BLM should encourage the use of any other voluntary methods, such as long term rest for a grazing allotment or short term durational grazing in appropriate seasons on BLM lands, that would minimize or avoid disturbance in sage grouse habitat.	All	BLM	emc0308GB
341.	I very much want to see Sage Grouse numbers increased to to levels that are mutually acceptable to all stakeholders. However, I do not believe that stopping or curtailing grazing will help in restoring their populations	All	Both	emc0311GB
342.	Good science....if people will actually believe it....shows that cattle grazing has many beneficial affects on our rangeland like re-seeding of desirable grasses and feed. Natural cover and elimination of toxic weeds to name a few	All	Both	emc0311GB
343.	Historic and current research and science have proven that ecologically-based grazing of domestic livestock can be beneficial in ecosystem functioning, and by inference, for sage-grouse and associated species.	All	Both	emc0314GB

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344.	It is also necessary that the preferred alternative explicitly recognize the key importance of public lands ranching operations to the success of sage-grouse conservation. Scientific research has repeatedly shown that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife species. Well-managed grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species.	All	Both	emc0315GB
345.	Moreover, public lands ranchers own a significant portion of high-quality lowland brood rearing habitat as deeded property. According to the USDA Natural Resources Conservation Service (NRCS), "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands." However, if regulatory measures on public lands make ranching operations economically unsustainable, these operations are subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse conservation measures do not undermine the viability of public lands ranches.	All	Both	emc0315GB
346.	Any EIS or SEIS developed must also recognize and incorporate the extensive research that has already been conducted by NRCS on the complimentary relationship between sage-grouse conservation and grazing. According to NRCS, "the same factors that negatively affect sage-grouse also negatively affect the health, productivity, and sustainability of native grazing lands. Therefore, improvements to benefit sage-grouse also benefit grazing lands and the ranchers that depend on them."	All	Both	emc0315GB
347.	Any EIS or SEIS must also explicitly recognize the following points: - Properly managed grazing can enhance sage-grouse habitat and should be incorporated into the sage-grouse management strategy. - Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations.	All	Both	emc0315GB
348.	Any EIS or SEIS must also explicitly recognize the following points: In the Great Basin, and much ofthe western United States, livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire rural communities that largely depend on ranching to maintain businesses and tax base.	All	Both	emc0315GB
349.	PFA believes livestock grazing (overgrazing) is the number one issue facing Greater Sage-grouse conservation in Idaho. Overgrazing contributes to huge losses of Sage-grouse, and other sagebrush obligate species, due to loss and degradation of native habitat and important watersheds. In Overgrazing: Is A Solution Available?, a paper by Brian Osborn, overgrazing can be defined as "the occurrence of a population of grazers (usually cattle) utilizing an area which cannot support the population indefinitely without being allowed to recover." Why is overgrazing so harmful? Homewood and Rodgers (1987) report that if overgrazing is continued, its endpoint will be desertification. Desertification is the sustained decline and/or destruction of the biological productivity of arid and semiarid lands caused in large part by man-made stresses. If these stresses are continued, ecological degradation and desert like conditions may arise (Wallace 1989). In addition, overgrazing leads to a decline in local wildlife populations by destroying their habitat. Since one ecosystem is not	All	Both	emc0316GB

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	working in isolation, other ecosystems that rely on the damaged one also suffer. As a result, populations of species living outside of the degraded area can also be affected.			
350.	When PFA refers to the word "overgrazing" in these comments, we are talking about the impacts of grazing on public land over a long period of time, one hundred years or more in most cases. During most of that time period of that time, there was not adequate monitoring and oversight by BLM, USFS, and State Lands Commission, agencies that were set up specifically to protect public land. Below is a list of impacts PFA members have observed and documented over the last twenty or more years. These are concerns we have for sage steppe habitat overgrazed by livestock on public land. We are not all scientists or biologists, but we have worked to learn as much as we can about issues and impacts by livestock as well as properly functioning ecosystems. Concerns about grazing (overgrazed) impacts in sage steppe habitat: · Soil erosion and compaction (we believe in most cases, the degree of severity is limited only by topography); · Loss of mesic and riparian areas; · Loss of riparian vegetation and bank integrity; · Gulley and wash formation; · Lowering of the water table; · Dysfunctional watersheds; · Invasive weeds and grasses; · Loss of mosses and biotic soils; · Loss of native vegetation such as forbs, shrubs, trees, and grasses; · Loss of ground cover, including little or no litter in many areas; · Trampling of nesting and brooding areas of ground nesting birds including CEUR; · Little or no understory in many areas; · Over-utilized crested-wheat seedings; · Plant pedestalling, surrounding bare ground, and exposed roots; · Large areas of open and connecting bare ground; · Large "sacrifice" areas near streams, springs, seeps, and water developments (improvements?); · Loss of water quality, silt and pollution (introduction of livestock feces and urine); · Fencing unfriendly to wildlife, netting and many strand fencing still found on BLM and Forest lands; · Loss of native habitat to wildfire and encouraging repeated fire cycle; · Loss of reseeded areas, burns and vegetation treatment projects by allowing livestock back before plants have sufficient growth to survive (two full years or less); · Grazing in early spring, late winter, prolonged wet seasons, and year round · Insufficient cover for wildlife · Frequent aerial gunning (observed and documented by PFA members in Burley F.O.);	All	Both	emc0316GB

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	· Failure to maintain water troughs or substituting with ponds that quickly become polluted and encourage the spread of West Nile Virus and, · Failure to rehabilitate pipelines and burns (invasive weeds, grasses and bare ground). Most of the concerns listed above due to the impacts of overgrazing are moderate to severe in most LM and USFS allotments throughout sagebrush steppe/CEUR habitat in our area. We have serious concerns about year-round grazing, continuous grazing throughout the grazing season, and livestock grazing during wet seasons. Additional disturbances caused by livestock improvements, infrastructure, recreation, mining, energy projects, and gas and oil exploration all contribute to the degradation and elimination of sage steppe habitat, and ultimately Greater Sage-grouse.			
351.	We see nothing new in the Instructional Memorandum 12-27-2011(IM) and the National Technical Team (NTT) report. We are concerned that the NTT report is too general particularly the Range Management section. It does not adequately address ongoing and cumulative threats and impacts by livestock. We found the NTT's recommendations to be pretty much the same ones recommended now to improve rangeland for livestock grazing. The report avoids tackling the important issue of direct, indirect, and cumulative impacts by livestock grazing (overgrazing) on public land for more than a hundred and fifty years.	All	Both	emc0316GB
352.	Prairie Falcon Audubon members have documented grazing impacts for the last twenty years. We have seen very little change in the way sagebrush steppe and sage-grouse habitat are managed. The BLM, while making all kinds of promises, seems unwilling to protect, or conserve or enhance natural resources for Sage-grouse and sage steppe in any real way. As an example, the BLM still allows year-round, continuous, late winter, and early turnout for spring grazing. These are critical times when habitat is vulnerable to soil compaction and when early native forbs and grasses, need time to become established. The elimination of early native forbs and grasses from the landscape is deleterious to Sage-grouse and other sagebrush obligate species. Fuels projects and lax forage utilization management, Meteorological Towers for wind projects and aggressive exotic kochia seeding for "fire breaks" in sage steppe across the west etc. allow easier predation and major loss of native vegetation and habitat.	All	Both	emc0316GB
353.	As stated above, our concerns about vegetation treatments and burns are valid, as we have observed and documented what happens after treatments when grazing is allowed back at two years or sooner. We believe the BLM and the USFS must not allow grazing until after a much longer period of time, five to ten years. This allows for a more permanent restoration to counter invasive grasses, weeds and wildfire and save taxpayers' dollars. In order to stop and/or reverse the alarming and accelerating downward trend of habitat conditions found on public lands, federal agencies have a responsibility to clearly define an environmentally sound direction for States to follow, as there is always state and local political pressure by private interests and short-sighted stakeholders to side -step, profit from, and simply ignore federal regulations.	All	Both	emc0316GB
354.	Start implementing strict measures for grazing such as the enforcement of Standards and Guides using restorative measures to ensure conservation of sage steppe habitat now and in the future.	All	Both	emc0316GB
355.	Restrict and retire grazing allotments in all key habitat areas. Reassess, manage and monitor livestock to improve and protect all restoration areas. Rest treatment and burn areas for a much longer time, five to ten years.	All	Both	emc0316GB

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356.	The biggest issue we see is livestock grazing (overgrazing) for the past one hundred years or more. Issues that livestock impacts are management of riparian and mesic areas and grazing during critical times of the year, including wet and early growing seasons to protect the native forbs, grasses and biotic soils that are so important to Sage-grouse. Agencies must adhere to their own forage utilization standards and rigorously monitor and manage grazing on our public lands. To that end the BLM and the USFS must: -Develop alternatives to control grazing impacts that include a "no grazing" alternative in key habitats and areas of restoration of potential key habitat;	All	Both	emc0316GB
357.	The evaluation of the need for permanent roads or seasonal road/area closures should include public input as part of the evaluation. Many of these roads that receive limited use are important to ranchers for getting to water developments, distributing salt or supplements, and towing horse trailers to the ends of the roads to initiate riding to move livestock. Effective livestock grazing, which can benefit sage-grouse, depends on the continued use of such roads and trails.	All	Both	emc0322GB
358.	On page 14, Range Management, only negative aspects of herbivory are listed, yet there is scientific evidence that grazing can improve nutrition of sage-grouse food items, that sage-grouse prefer grazed meadows over ungrazed meadows, and in areas dominated by grasses and widely spaced shrubs, grazing can be an effective fuels management tool. These seem like conservation measures that should also be used to benefit sage-grouse and they should be included in the EIS analysis.	All	Both	emc0322GB
359.	In addition, the list of "negative" aspects of herbivory does not recognize that many of these same conditions can be achieved in the absence of grazing. Plant dynamics of the various sagebrush ecological sites will result in shrub-dominated vegetation over time in the absence of disturbance. Therefore, the lateral cover necessary for nesting and the changes in sage-grouse habitat due to shrub-grass competitive dynamics create habitat conditions unfavorable to sage-grouse nesting, early brood habitat, and pre-laying habitat. While proper grazing management can be a beneficial tool, improper vegetation management can be a detriment to sage-grouse.	All	Both	emc0322GB
360.	At page 16, Riparian Areas and Wet Meadows, managing for proper functioning condition of these sites within sage-grouse priority habitats should include grazing. As indicated above, grazing of meadows improves the nutrition of the forbs used by sage-grouse and sage-grouse demonstrate a preference for grazed versus ungrazed meadows. This needs to be included in the EIS analysis.	All	Both	emc0322GB
361.	On page 17, Retirement of Grazing Privileges, the planning note at the bottom of the page indicates that BLM and USFS will target specific allotments for permanent retirement of grazing privileges. The authority for this use of BLM and USFS action needs to be identified in the EIS and the socio-economic impacts of this type of action need to be analyzed in the EIS.	All	Both	emc0322GB
362.	Grazing as a fuel reduction tool that can be useful where grasses are the fuel that carries the fire, but limiting grazing in sage-grouse habitats conflicts with the conservation measure of reducing fuels.	All	Both	emc0322GB
363.	Our family business is in the cattle business and our community and many local businesses are dependent upon livestock grazing on public lands - arbitrary changes to land-use plans could seriously damage our local economy, private businesses and sagegrouse populations in our area. The assumption of many managers inside and outside BLM and other agencies is that because of the proposed listing of sage-grouse, that something different in land use or management needs to be done when the opposite should be the starting point for sage-grouse conservation measures and they need to be site specific.	All	Both	emc0323GB

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364.	Specific to grazing, reduction in grazing levels, removal of grazing during the nesting or mating season may be very negative towards nesting success and sustainability of sagegrouse. Livestock grazing can provide a direct and indirect benefit for many wildlife species especially sage-grouse through stimulating forbs and herbaceous growth conditions that meet sage-grouse needs during critical physiological and seasonal periods and needs. Livestock grazing is very beneficia! to decreasing the risk of wildfire and mortality of important understory plant species. Research by the Agricultural Research Service (Bates, Svejcar et. Al.) indicates healthy grazed plants are less susceptible to hot fire conditions compared to ungrazed protected plants.	All	Both	emc0323GB
365.	Public lands ranchers own a significant portion of high-quality habitat as deeded property and that deeded property is managed and used in conjunction with public grazing permits for the mutual benefit of protecting sage-grouse habitat, populations and major risks. According to the USDA Natural Resources Conservation Service (NRCS), "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands." The continued viability oflivestock operations and beneficial role public land grazing plays and benefits sustainable livestock businesses needs to be emphasized in any national guidance.	All	Both	emc0323GB
366.	Again, the burden of proof needs to be on proponents of major changes in timing and duration of grazing and historical levels of grazing. We have example after example where removal of grazing negatively impacts sage-grouse and other species not to say increasing the risk of wildfire.	All	Both	emc0323GB
367.	o Grazing Permits The IM appears to presume that that livestock grazing is a threat to sage grouse conservation in management areas. BLM should start from the premise that properly managed livestock grazing can be a benefit for sage grouse, and the analyses should consider how to incorporate properly managed livestock grazing into the protection strategy. Many NMA members hold and operate federal grazing interests. Owners of such interests are often the stewards of the greater sage-grouse habitat on both the private and public land they use. They provide an effective line of defense against fire and noxious weeds, manage forage for optimum production, and are the primary protectors of open space in the private lands of the West. Without ranchers, large areas of greater sage-grouse habitat would be in jeopardy. The benefits provided by ranching and grazing relate directly to several identified threats to greater sage-grouse habitat, including wildfire, invasive plants, and urbanization and development. Sound scientific research indicates that grazing is beneficial to the greater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires. (Launchbaugh et al.2007)6. It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et. 1994, Evans 1996)7. It has also been used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994)8. Furthermore, regarding rangeland management, the NTT document suggests that new water development for diversion from springs or seep sources should be authorized only when priority sage grouse habitat would benefit from such development. This recommendation is extreme and should be rejected. Instead of this requirement, the policy should not discourage water development unless it significantly harms sage grouse populations.	All	BLM	emc0331GB
368.	Livestock grazing on public and private land contributes to the Sage grouse habitats by managing the optimum use of the forage, therefore less dry fuels for wild fires. The EIS and SEIS revisions should clarity that grazing should be used to reduce the risk of catastrophic wild fires and improve forage.	All	Both	emc0332GB
369.	At any rate, it would be a mistake to put them on the endangered species list. They co-exist with sheep well. It would be	All	Both	emc0336GB

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	detrimental to ranchers such as myself if we had no access to public lands for grazing.			
370.	The BLM must analyze the positive impacts of grazing upon the health of the range, and the retention of water in the area, with the resultant benefits to sage grouse.	All	BLM	emc0337GB
371.	It is also necessary that the preferred alternative explicitly recognize the key importance of public lands ranching operations to the success of sage-grouse conservation. Scientific research has repeatedly shown that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife species. Well managed grazing can improve sage-grouse habitat by increasing the quality and accessibility of other beneficial vegetation and also aids in the control of invasive plant species. Moreover, public lands ranchers own a significant portion of high quality lowland brood rearing habitat as deeded property. NRCS estimates that approximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands. Any EIS or SEIS developed must recognize and incorporate the fact that properly managed grazing can enhance sage-grouse habitat and should be incorporated into the sage-grouse management strategy and livestock operations are highly dependent upon the combined use of private and public lands. If regulatory measures on public lands make ranching operations economically unsustainable, these operations are subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse conservation measures do not undermine the viability of public lands ranches. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire rural communities that largely depend on ranching to maintain businesses and tax base.	All	Both	emc0341GB
372.	Numerous scientific studies have shown that well-managed livestock grazing is both compatible with and beneficial to Sage Grouse habitat conservation. Local ranchers provide defense against fire and noxious weeds, manage forage for optimum production, and are the primary protectors of open space. According to BLM's Instruction Memorandum No. 2012-043, "Given the potential financial constraints in addressing the primary threats [to Sage Grouse] identified by the [Fish and Wildlife Service] FWS, enhanced management oflivestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." Similarly, the Natural Resources Conservation Service ("NRCS") has stated that grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition."	All	Both	emc0342GB
373.	Wildlife species can actually benefit from some levels of livestock grazing. In fact, wildlife species diversity was highest in a mosaic of light to moderately grazed areas with mid to upper level ecological states. Grazing can be used to improve wildlife habitat and benefit certain wildlife species. This includes several wildlife species which are candidates for listing under the Endangered Species Act. See ~ E. W. Anderson & R. J. Scherzinger, Improving Quality of Winter Foragefor Elk by Cattle Grazing, 28 J. Range Mgmt., 120 (1975); Martin Vavra, Livestock Grazing and Wildlife: Developing Compatibilities, 58 Rangeland Ecology & Mgmt 128 (2005); K. E. Severson & P. J. Urness, Livestock Grazing: A Tool to Improve Wildlife Habitat, in Ecological Implications of Livestock Herbivory in / _ f5 the West, 232.	All	Both	emc0342GB
374.	Grazing additionally reduces the instances and severity of wildfires (Launchbaugh et al. 2007); improves Sage Grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel1980, Derner et al. 1994, Evans 1996); and can be used to control invasive weeds (Olson and Lacey 1994, Walker et al. 1994).	All	Both	emc0342GB

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375.	Clearly a BLM Technical Team review that does not include the review and expertise from the range scientists should not be used for informing the BLM how to manage range and livestock grazing	All	Both	emc0342GB
376.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: -Landscapes managed for livestock grazing may fail to provide optimum habitat for sage grouse.	All	Both	emc0343GB
377.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: -Fences cause direct mortality for sage grouse and serve as perches for their predators	All	Both	emc0343GB
378.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: -Human-caused impediments to natural water drainage can reduce the input of water, nutrients and sediments, which help to sustain and recruit sagebrush.	All	Both	emc0343GB
379.	Livestock grazing is considered the single most important influence on sagebrush habitats and fire regimes throughout the Intermountain West in the past 140 years (Knick et al. 2005: 68). Grazing is the most widespread use of sagebrush steppe and almost all sagebrush habitat is managed for grazing (Connelly et al. 2004; Knick et al. 2003; Knick et al. 2011).6 Livestock grazing disturbs the soil, removes native vegetation, and spreads invasive species in sagebrush steppe (Knick et al. 2005). Cattle or sheep grazing in sage grouse nesting and brood-rearing habitat can negatively affect habitat quality; nutrition for gravid hens; clutch size; nesting success; and/or chick survival (Connelly and Braun 1997; Beck and Mitchell 2000; Barnett and Crawford 1994; Coggins 1998; Aldridge and Brigham 2003). Livestock may directly compete with sage grouse for grasses, forbs and shrub species; trample vegetation and sage grouse nests; disturb individual birds and cause nest abandonment (Vallentine 1990; Pederson et al. 2003; Call and Maser 1985; Holloran and Anderson 2003; Coates 2007).	All	Both	emc0343GB
380.	The potential conflict between livestock grazing and sage grouse intensifies near water sources due to the importance of these areas to sage grouse, particularly during early brood rearing. Heavy cattle grazing near springs, seeps, and riparian areas can remove grasses used for cover by grouse (Klebenow 1982). According to Call and Maser (1985:17), "rapid removal of forbs by livestock on spring or summer ranges may have a substantial adverse impact on young grouse, especially where forbs are already scarce."	All	Both	emc0343GB
381.	Grazing infrastructure, such as water developments and fences, fragment and degrade sage grouse habitat (Connelly et al. 2004; Braun 1998; Call and Maser 1985; Knick et al. 2003). Fatal collisions with fences were "relatively common and widespread" in sage grouse breeding habitat in southern Idaho (Stevens 2011), corroborating other evidence that fences may pose a significant risk to low flying sage grouse (e.g., Danvir 2002, unpublished report). Fence densities exceed 2 km/km2 in many areas occupied by sage grouse (Knick et al. 2011).	All	Both	emc0343GB
382.	Native vegetation communities in Great basin sagebrush steppe did not evolve with grazing pressure (Mack and Thompson 1982). Excessive livestock grazing by domestic livestock during the late 1800s and early 1900s had significant impacts on sagebrush steppe and those effects persist today (Knick et al. 2003). Grazing (in addition to other factors) is implicated in the encroachment of conifers in sagebrush steppe, including western juniper (Juniperus occidentalis) (Kerr and Salvo 2007). Decades of livestock grazing have altered plant communities and soil and reduced productivity in sagebrush steppe (Knick et al 2003). Cattle grazed at "conservative" levels in sagebrush steppe in the northern Great Basin initially selected bunchgrasses in interspaces between sagebrush plants (France et al. 2008). The removal of native species from interspaces by cattle, in conjunction with other factors, appears to facilitate invasion by cheatgrass (Bromus tectorum) into these areas	All	Both	emc0343GB

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	(Reisner 2010). The spread of cheatgrass and other invasive plants into degraded rangelands has accelerated the natural fire cycle and threatens to convert enormous areas of sagebrush habitat into annual grasslands (Wisdom et al. 2005; Miller et al. 2011).			
383.	Grazing management was identified as a threat to sage grouse by three expert panels and in recent reviews (Connelly et al. 2011, Table 1). Federal scientists have suggested that "livestock grazing across the public lands of western landscapes has impacted and will continue to impact the quality of those habitats and their ability to support source populations of sagebrush bird species" (Rich et al. 2005: 592). The Fish and Wildlife Service concluded that grazing "can seriously degrade sage-grouse habitat" locally and that, "given the widespread nature of grazing, the potential for population-level impacts cannot be ignored" (75 Fed. Reg. 13942-13943). In their study on sage grouse in eastern Oregon, Call and Maser (1985: 3) made the following basic assumption: "Where there are conflicts between sage grouse and livestock on public lands, it may be essential to give priority to sage-grouse if they are to continue to exist on these areas."	All	Both	emc0343GB
384.	According to Taylor et al. (2010:36), "Our vital rate analyses indicate that, in unstressed environments, altering grass height through grazing management may be an effective way to increase population growth rate and therefore population size." Female survival and chick survival had the highest sensitivity to this variable, but nest success was also affected.	All	Both	emc0343GB
385.	Baker (2006) reviewed the fire history of sagebrush ecosystems and found natural fire to be a rare event, suggesting a fire rotation 325-450 years in length. However, overgrazing across many of the Great Basin states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage grouse rely for food and cover. Approximately 36 percent of the greater sage grouse range is invaded by cheatgrass (Lebbin et al. 2010). Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring invades areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.	All	Both	emc0343GB
386.	Sage grouse do not use cheatgrass. Invasive species was identified as a threat to sage grouse by three expert panels and in recent reviews (Connelly et al. 2011, Table 1). One panel listed cheatgrass as the most important threat to sage grouse in the western portion of its range (70 Fed. Reg. 2267), where it has invaded much of the lower elevation, xeric sagebrush habitat (Miller et al. 2011). Land uses such as livestock grazing (Reisner 2010), off-road vehicle use, and coalbed methane development (Bergquist et al. 2007), can facilitate cheatgrass incursion in sagebrush steppe.	All	Both	emc0343GB
387.	The recovery of sagebrush "treatment" areas is further complicated by livestock grazing, which can hamper the establishment of native plants and spread the seeds of noxious weeds such as cheatgrass. Lambert (2005) recommended protecting re-seeded areas from livestock grazing for no less than 3 to 5 years. However, this standard is virtually never adhered to in practice in the West, where virtually every acre of public land falls within a grazing allotment.	All	Both	emc0343GB
388.	Livestock Grazing • During spring and summer, do not permit grazing in key sage grouse habitats until after June 20 and remove livestock by August 1 with a goal of leaving at least 70 percent of the herbaceous production each year to form residual cover to benefit sage grouse nesting the following spring. • Prohibit twice-over grazing systems, where livestock pass through an area twice in a grazing season. • Encourage winter grazing, which is generally less negative for herbaceous vegetation and sage grouse than grazing during the growing season. • Water and salt should be placed near fences or fence corners, as livestock tend to congregate in these areas. The goal should be to reduce livestock impacts in the centers of pastures or allotments. • Avoid constructing new fences; remove unnecessary fences; and visually mark remaining fences to	All	Both	emc0343GB

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	reduce sage grouse collisions with fences. • Facilitate permanent, voluntary grazing permit/lease retirement. (see Braun 2006).			
389.	At minimum, the NEPA analysis should address the following: • Managing grazing levels in a way that is compatible with sage grouse habitat needs, and in Core areas, managing grazing to optimize sage grouse habitat conditions rather than maximizing livestock production.	All	Both	emc0343GB
390.	At minimum, the NEPA analysis should address the following: • Assessing the impact of fences as causes of sage grouse mortality, preventing new fence construction within 5.3 miles of sage grouse leks to protect nesting habitat, and eliminating existing fence in these areas to the greatest extent practicable.	All	Both	emc0343GB
391.	General Comments on the December 21, 2011 report from the Sage-grouse National Technical Team "A Report on National Greater Sage-Grouse Conservation Measures An alternative based on the Report will go far beyond what is required by the Purpose and Need. The Report fails to adequately incorporate the successful efforts by the local sage grouse working groups and may stop effective efforts that are currently underway. It places arbitrary and capricious limits on recreational activities (roads and trails) as well as water developments. It would also direct the agencies to retire grazing allotments, which is currently prohibited by law. Additional alternatives should be developed to respond to these and other concerns	All	Both	emc0345GB
392.	Finally, the Coalition urges BLM and the Forest Service to proceed with caution in implementing the prescriptions for sage grouse management found in the 2011 Technical Team Report. The majority of these conservation measures lack supporting data and many will cause harm to rangeland resources and destroy local communities and their economies.	All	Both	emc0371GB
393.	Livestock Grazing Incorrectly Singled Out Livestock grazing is described as a diffuse disturbance while the IM ignores other direct and diffuse disturbances, including wild horses, wildlife herbivory and hunting. Technical Team Report at p.14. It is difficult to understand the basis or the criteria used. CLG views this portion of the Technical Team Report is naked attack on livestock grazing that merits sanctions for its lack of merit. The recommendations for grazing show a fundamental lack of knowledge about grazing regulation and other grazing animals. In most western states, livestock numbers have declined while wildlife and predator numbers have increased. Ex. 1 pp. 3-4; Ex. 1A pp. 6-9 (grazing created more favorable habitat conditions for sage grouse). The RMP revisions need to develop the data regarding big game, wild horses and livestock numbers for each project area. Livestock grazing initially set in motion plant succession that created sage grouse habitat and predator control in defense of livestock made it a safe environment for sage-grouse. Ex. 1A pp. 9-10. Livestock grazing on the majority of the allotments has been managed under use limits, rotations and stocking rate limits. It should be noted that an important difference between livestock grazing and wild horses/big game is that the entire annual increase of livestock is removed each and every year and sent to market This is not the case, especially with wild horses. Healthy native range is as important to range livestock production as it is to sage grouse. The premise that livestock grazing as currently managed adversely affects sage-grouse or sage grouse habitat lacks documentation. Ex. 1A p. 8. Livestock do not eat sagebrush which is the winter cover and food source for sage grouse. Livestock do not directly harm sage grouse. For more than 15 years, grazing has been regulated under rangeland health standards. 43 C.F.R. §4180.2 (grazing must meet, maintain or make progress towards meeting range health standards). These standards were developed to protect and improve riparian areas, native vegetation and plant health and cover for all rangelands, which contributes to improvement of sage grouse habitat.	All	Both	emc0371GB

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	Virtually all operators use a deferred or rest rotation system and do not use the rangelands year-round, unlike some wildlife and all of the wild horse herds. To the extent that the criteria are not consistent with rangeland health standards, they must be ignored or set aside because rangeland health standards are mandated by regulation which supersedes an IM. 43 C.F.R. Part 4180. The Technical Team Report conservation measures appear to attribute livestock use to the decline in sage grouse habitat, Ex. pp. 3-4. This ignores the irreplaceable role that grazing plays in reducing fuel loads, improving plant palatability and vigor. If livestock grazing were removed, the private land associated with these ranches will be subdivided, with a loss in wildlife habitat and recreation access. The trend towards subdivisions accelerated after BLM contended incorrectly that livestock grazing caused the desertification of western rangelands, declines in wildlife habitat, and water quality degradation in the contest of the grazing rules revision. If BLM is going to require removal of livestock during key periods of its life cycle, Technical Team Report at p.15 (implement management actions which could include temporary non-use or livestock removal), it must do so for all other herbivores, including wild horses. It is not feasible to remove all herbivores, and for the same reason, it is ridiculous to assume that livestock should be removed as well. The recommendation to retire grazing privileges is unwarranted. BLM could improve rangeland health more quickly by moving wild horses onto private lands in nonpublic land states. The Technical Team Report also fails to recognize the stewardship of the livestock industry			
394.	B. Adaptive Management Not Prescriptive Management CLG believes that continued management of public rangelands to meet healthy standards will also ensure viable populations of sage grouse for decades to come. CLG supports adaptive management but IM 44, Technical Team Report, leaves no room for adaptive management. BLM should adopt the object of managing for rangeland resources and rangeland health and monitor population numbers. Then if there are changes in numbers, BLM would adjust based on the factors specific to the site.	All	BLM	emc0371GB
395.	Listing the sage grouse on the endangered species list, or enacting inhibitive rules upon western range lands will be extremely detrimental to my family's livelihood and our way of life. Though I was raised on a ranch in northern Nevada, I recently returned to the area with my husband and two year-old daughter, after purchased a ranch last year. The ranch, like most in the area, is dependent upon public range land for cattle grazing. Without grazing access on rangelands, our newly purchased ranch is no longer a viable business.	All	Both	emc0372GB
396.	Cattle and sage grouse have cohabitated western rangelands for years.	All	Both	emc0372GB
397.	Most importantly, there is no better steward of the land than a rancher. When Forest and BLM agencies consistently speak of underfunding and understaffing, ranchers are there, caring for rangelands. Ranchers distribute salt and mineral, attracting and benefiting various wildlife species. Not to mention the water sources established and maintained by ranchers.	All	Both	emc0372GB
398.	Removing cattle and ranchers from public lands will take away an ally from the sage grouse, and take away the livelihood from many western ranchers.	All	Both	emc0372GB
399.	The BLM has a multiple use mandate under Federal Land Policy and Management Act (FLPMA). The existing Resource Management Plans (RMPs) were developed after many years of analysis and public input, resulting in land use plans that struck an acceptable balance between multiple uses. Yet, this latest effort illustrates the continued threat of political vagaries potentially shifting that balance in a manner that is detrimental to energy development, grazing, fuel and vegetation	All	Both	emc0376GB

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	management, mineral development and recreation. Any selected alternative must minimize the restrictions placed on these legitimate and important land uses. We encourage the BLM to follow through on its commitment to protect valid, existing rights; such as grazing and energy leases and RS 24 77 access rights. We encourage the BLM to look not only at habitat availability, but also habitat suitability given the energy and mineral potential and other multiple use potential of preliminary priority sagegrouse habitat areas. The adoption of sound consistent land use areas insures there is no risk of sage-grouse conservation efforts hampering the energy industry's ability to produce domestic natural resources			
400.	Rangeland management must recognize the beneficial aspects of grazing in sustaining rangeland health and the rangeland improvements that have been made through the coordinated efforts of BLM managers and grazing permittees. Restortation grazing systems should be considered rather than no-grazing alternatives.	All	Both	emc0376GB
401.	In the NOI, it states that, "The inadequacy of regulatory mechanisms to conserve the greater sagegrouse and its habitat was identified as a significant threat in the FWS finding on the petition to list the greater sage-grouse as a threatened or endangered species." We strongly disagree with this statement and believe that BLM already has a surplus of regulatory mechanisms, primarily through rangeland health standard and guidelines, to conserve GSG habitat. Rangeland health standard and guidelines included provisions that apply to any use of federal lands including grazing, wild horses, and other vegetation disturbances including mining and grants of rights-of-way. These standards and guidelines are in addition to many controls specific to certain uses (e.g., mining) with strong regulatory controls at both the state and federal levels. If meeting habitat needs and rangeland health through established standards and guidelines and regulations is inadequate to conserve GSG habitat, what will ever be considered adequate? Perhaps the real issue lies within the fact that federal land managers and wildlife agencies are not currently adequately managing to meet the standards and guidelines for working, healthy rangelands and habitats. More regulation and red-tape should not be a measure considered to keep the GSG from being listed. More rules and regulations don't make progress happen on the land. The federal land management agencies should focus on what is already in place.	All	Both	emc0383GB
402.	a county that strongly relies on ranching conducted on or in concert with federally managed land, we are confused and alarmed over the allegations of "inadequate regulatory mechanisms." Based on the terms and conditions of livestock grazing permits and wide latitude granted to BLM on administering grazing permits that make progress towards established standards and guidelines, where are the actual shortages of not having enough control over livestock grazing? Even with many allotments meeting the standards for healthy rangelands, it appears that this does not seem to be sufficient for FWS, or an impetus for BLM to defend current protections that are or can already be put in place regardless of a LUP amendment. We have seen examples of instances within our county where it has been determined that livestock grazing is not a causal factor for not meeting standards yet we still see grazing permit changes made. We see this process as being magnified with the possibility of more restrictions being unduly placed on grazing permits. Those special interests who actively advocate for listing of the GSG openly consider it to be their best tool to achieve their overall goal of ending many uses on federally managed lands including livestock grazing. These entities are assisted in reaching their goal by federal and state government agencies who fail (or refuse) to recognize that proper management, when it occurs, is sufficient in maintaining, and often enhancing, GSG habitat. Given the potential for beneficial gains to enhance protection of habitat areas (especially for the management of fine fuel loads and invasive plants) properly managed livestock grazing should be the focus rather than grazing	All	Both	emc0383GB

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	prohibition. Grazing must be evaluated in the context of a tool to assist in accomplishing rangeland health objectives and GSG habitat enhancement. These considerations need to be documented and advanced in a proactive, unapologetic manner. Because livestock grazing, as is also the case with any number of other authorized uses, are managed with a significant set of regulatory oversight, we maintain that the impression of there being a lack of regulatory control, as a false pretense for further expansion of a regulatory regime. We believe that the LUP amendments should be based on a full range of possible approaches with the end results of rangeland health, socioeconomic stability, and GSG population improvements tied strongly together and not mutually exclusive. Ongoing monitoring and adaptive management procedures need to be spelled out to ensure that actions are measured against measurable and attainable objectives and fine-tuned or completely changed within an identified range of opportunities for public involvement. NEPA analyses should not start with the assumption that livestock grazing is a threat to GSG conservation in management areas. Instead, such analyses should start from the proven premise that managed livestock grazing are a benefit for GSG, and the analyses should consider how to further incorporate managed livestock grazing into the protection strategy.			
403.	While evaluating the ramifications of possible curtailment of livestock grazing use, consideration shouldtake into account the linkage between private ranch lands and federal land permits. Although we don't agree with the perspective that curtailment of properly-managed livestock grazing will have a beneficial result, we do want to stress the potential negative consequences for GSG habitat on private lands, if a livestock grazing permit is not allowed to be used. In order to maintain business operations, possible conversion of private land holdings may result from not being able to make use of federally-managed lands. More intensive land use of these private resources could result in a negative outcome for habitat located on private land. In areas where private lands and federally-managed lands are found in alternating sections (i.e., "checkerboard" lands) or where private lands make up a significant portion of large tracts of habitat, this increase in fragmentation would undoubtedly be far more of a problem and impact on GSG.	All	Both	emc0383GB
404.	For the most part we are concerned that the designation of these habitats and the regulatory application of conservation measures will be arbitrary without actual land-based conditions or grounded with proper rangeland science—namely Ecological Site Descriptions and State and Transition Models. The large majority of Ecological Sites in the state of Nevada do not have State and Transition Models developed and our local experience has shown that rangelands with their associated GSG habitats are too often managed based on old, outdated, and disproven Clementsian succession. The support documents attached or referenced by BLM are described as the "science" that will lay the foundation for the LUP revisions and on-the-ground management. These reports and documents magnify our concern because it is very apparent that much of the described understanding by the wildlife biologists is disconnected from current rangeland science.	All	Both	emc0383GB
405.	Our main concern is that kicking cattle off the range is not the intent of the protection agencies. It is a fact that properly managed grazing is very beneficial for the wildlife on the range. Cattle grazing can improve sage grouse habitat by increasing the accessibility of vegetation. Grazing also stimulates re- growth and helps re-seed. Historically, the co-mingling of cattle grazing and sage grouse has been shown to be positive. For example, the greatest number of sage grouse correspondswith the greatest number of livestock grazing.	All	Both	emc0387GB
406.	I believe that habitat plans should be site specific and not a state wide blanketed plan. We have already have had and are in the middle of Sage Grouse habitat vegetation projects on public and private lands in our allotment and county. A lot of	All	Both	emc0389GB

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	private land in this area has some preferred use for Sage Grouse, taking livestock off the public range will result in over use of the private which in some areas more preferred to the Sage Grouse.			
407.	History, studies, and common sense dictate that good livestock grazing promotes a strong, healthy, sage-grouse population. In the past, when sage-grouse populations were higher, livestock (both cattle and sheep) grazed the range in higher numbers. There was also not the high incidence nor huge magnitude of rangeland wildfires that is occurring today. Grazing itself ensures a more vigorous, palatable plant community. Thus, livestock grazing and a prolific sage-grouse population go hand in hand.	All	Both	emc0390GB
408.	Public land is public and serves many uses besides ranching, however responsible livestock grazing is crucial to managing public land. It only makes sense that livestock grazing be a key component to not only managing for sage grouse, but wildlife in general.	All	Both	emc0390GB
409.	In addition, should ranchers find it economically unviable to remain ranching, private land will likely go on the market and quite possibly exit the agriculture sector. As urbanization has been the trend, It would be a shame for more prime agricultural land to go into housing development.	All	Both	emc0390GB
410.	The success of most cow/calf operations depends on being able to use federal rangeland. We gladly accept responsibility of managing the range that has been entrusted to us. As stewards of this range we are closer to it than anyone and fervently request to be involved firsthand in this quest to conserve the greater sagegrouse.	All	Both	emc0390GB
411.	Bottom line…because our livelihood depends on public land grazing we CARE about public lands. Because our livelihood depends on public land grazing we are very willing to work with efforts aimed at wildlife conservation, including that of the greater sage-grouse. Removing livestock from the public rangeland would be detrimental to wildlife, the general public, ranching, and the local economy.	All	Both	emc0390GB
412.	Livestock grazing management. Issue: Livestock grazing is the most pervasive land use in sagebrush steppe and has led to significant loss of grass and forb cover in sage-grouse habitat. Most sage-grouse habitat fails to meet sage-grouse habitat objectives. Issue: Livestock grazing contributes to the spread of invasive species, conifer encroachment and unnatural fire in sagebrush steppe. Issue: Livestock management as normally practiced by federal agencies leads to significant degradation of riparian areas. Issue: Range facilities such as water developments, fences, and nutrient supplements generally negatively affect sage-grouse.	All	Both	emc0391GB
413.	Livestock grazing is considered the single most important influence on sagebrush habitats and fire regimes throughout the Intermountain West in the past 140 years (Knick et al. 2005: 68). Grazing is the most widespread use of sagebrush steppe and almost all sagebrush habitat is managed for grazing (Connelly et al. 2004; Knick et al. 2003; Knick et al. 2011).11 Livestock grazing disturbs the soil, removes native vegetation, and spreads invasive species in sagebrush steppe (Knick et al. 2005). Cattle or sheep grazing in sage-grouse nesting and brood-rearing habitat can negatively affect habitat quality; nutrition for gravid hens; clutch size; nesting success; and/or chick survival (Connelly and Braun 1997; Beck and Mitchell 2000; Barnett and Crawford 1994; Coggins 1998; Aldridge and Brigham 2003). Livestock may directly compete with sage-grouse for grasses, forbs and shrub species; trample vegetation and sage-grouse nests; disturb individual birds and cause nest abandonment (Vallentine 1990; Pederson et al. 2003; Call and Maser 1985; Holloran and Anderson 2003; Coates 2007). The	All	Both	emc0391GB

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	potential conflict between livestock grazing and sage-grouse intensifies near riparian and mesic habitats due to the importance of these areas to sage-grouse, particularly during brood-rearing and in summer. Heavy cattle grazing near springs, seeps, and riparian areas can remove grasses used for cover by grouse (Klebenow 1982). According to Call and Maser (1985:17), "rapid removal of forbs by livestock on spring or summer ranges may have a substantial adverse impact on young grouse, especially where forbs are already scarce."			
414.	Grazing infrastructure, such as water developments and fences, also fragment and degrade sagegrouse habitat (Connelly et al. 2004; Braun 1998; Call and Maser 1985; Knick et al. 2003). Fatal collisions with fences were "relatively common and widespread" in sage-grouse breeding habitat in southern Idaho (Stevens 2011), corroborating other evidence that fences may pose a significant risk to low flying sage-grouse (e.g., Danvir 2002, unpublished report). Fences (like other high structures) may serve as perches for raptors and other avian predators of sage-grouse nests, chicks and adults (Connelly et al. 2011b). Fence densities exceed 2 km/km2 in many areas occupied by sage grouse (Knick et al. 2011).	All	Both	emc0391GB
415.	Native vegetation communities in sagebrush steppe did not evolve with significant grazing pressure by large ungulates (Mack and Thompson 1982). Excessive livestock grazing by domestic livestock during the late 1800s and early 1900s had significant impacts on sagebrush steppe and those effects persist today (Knick et al. 2003). Grazing (in addition to other factors) isimplicated in the encroachment of conifers in sagebrush steppe, including western juniper (Juniperus occidentalis) (Knick et al. 2011, citing Miller and Rose 1999; Kerr and Salvo 2007, unpublished report). Decades of livestock grazing have altered plant communities and soil and reduced productivity in sagebrush steppe (Knick et al 2003). Cattle grazed at "conservative" levels in sagebrush steppe in the northern Great Basin initially selected bunchgrasses in interspaces between sagebrush plants (France et al. 2008). The removal of native species from interspaces by cattle, in conjunction with other factors, appears to facilitate invasion by cheatgrass (Bromus tectorum) into these areas (Reisner 2010). The spread of cheatgrass and other invasive plants into degraded rangelands has accelerated the natural fire cycle and threatens to convert enormous areas of sagebrush habitat into annual grasslands (Wisdom et al. 2005c; Miller et al. 2011). Ecological modeling indicates that sheep grazing in sagebrush steppe may cause declines in sage-grouse populations (particularly where large, frequent fires also occur in the same area) (Pederson et al. 2003).	All	Both	emc0391GB
416.	Rich et al. (2005: 592) suggested that "livestock grazing across the public lands of western landscapes has impacted and will continue to impact the quality of those habitats and their ability to support source populations of sagebrush bird species." The authors contended that, contrary to prevailing sentiment, the number of animal unit months (AUMs) provided on federal public lands in Oregon, Idaho and Washington, has varied little over the period from 1949 and 2000 and that there were more AUMs on public lands in these states in 2000 than 1949 (when recordkeeping began) (Rich et al. 2005). Further, "livestock have been selected so that the mean mass of individuals has increased over time" and, consequently, "the total grazing impact on the vegetation and other resources is substantially greater than it was historically" (Rich et al. 2005: 599 and figures). Beck and Mitchell (2000) reviewed literature for positive and negative direct and indirect effects of livestock grazing on sage grouse. Their review found more negative than positive impacts from grazing. (Beck and Mitchell 2000: 994, Table 1). However, of greater importance is the scope of the reported positive and negative impacts on sage-grouse and sagebrush	All	Both	emc0391GB

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	habitats. While positive impacts are generally limited to specific areas and circumstances (e.g., light grazing regenerates upland meadow), negative impacts often affect much larger areas, rendering them unusable for sage-grouse. Impacts should be considered in the context of their scale. For example, a sage grouse population in southeastern Idaho may have benefited indirectly from presence of livestock when they established strutting grounds on sheep salting areas [very small areas relative to overall habitat], whereas weed infestations induced by livestock grazing in the Great Basin may reduce quality of habitat for sage grouse populations across this vast region. (Beck and Mitchell 2000: 997, citations omitted). Connelly et al. (2007), citing Coggins (1998) and Beck and Mitchell (2000), stated that "[t]he large number of documented negative impacts of livestock grazing in sagebrush shrub steppe appears to neutralize or outweigh any positive effects." Jones (2000) found that 11 of 16 analyses of the effects of livestock grazing in arid ecosystems revealed significant negative effects on a range of ecological components from livestock grazing, including reduced grass and shrub cover, and reduced total vegetation biomass. Beck and Mitchell (2000) concluded that livestock grazing appears to most affect productivity of sage grouse populations. Moynahan et al. (2007) also noted that condition of greater sage-grouse nesting habitat, an important factor in sage-grouse productivity, is likely affected by livestock grazing, among other influences. Holloran et al. (2005: 648) documented the importance of herbaceous cover, including residual grass, to sage-grouse nesting success and concluded that "annual grazing in nesting habitat, regardless of the timing, could negatively impact the following year's nesting success [by reducing residual vegetation]." Aldridge and Boyce (2007: 522), citing Manier and Hobbs (2006), suggested that removing cattle or reducing livestock intensity may result in increased shrub cover and/or plant diversity in shrubsteppe. They also suggested that eliminating water impoundments (such as earthen livestock watering holes) may allow water to recharge former mesic sites in sagebrush steppe, which would benefit sage-grouse (Aldridge and Boyce 2007: 523). Grazing management was identified as a threat to sage-grouse by three expert panels and in recent reviews (Connelly et al. 2011: 555-556, Tables 24.1, 24.2). Federal government scientists have suggested that "livestock grazing across the public lands of western landscapes has impacted and will continue to impact the quality of those habitats and their ability to support source populations of sagebrush bird species" (Rich et al. 2005: 592). In their study on sage-grouse in eastern Oregon, Call and Maser (1985: 3) made the following basic assumption: "[w]here there are conflicts between sage grouse and livestock on public lands, it may be essential to give priority to sage-grouse if they are to continue to exist on these areas."			
417.	Contributions of Livestock Grazing to Cheatgrass Incursion Livestock grazing appears to spread cheatgrass through multiple effects (Chambers 2008b) and grazing is probably not effective to control cheatgrass in preparation for restoring sagebrush steppe (Hempy-Mayer and Pyke 2008). Other information suggests that there are simply not enough livestock available to graze at the preferred locations, at the preferred intensity, at the preferred times during the year, to control cheatgrass at a landscape-level (McAdoo et al., undated, factsheet). The number of livestock and grazing intensity required to control cheatgrass would also probably have additional negative effects on native vegetation, soil, and other resources in sagebrush steppe that could outweigh any benefits from cheatgrass control. The removal of herbaceous perennials by grazing may increase water and nitrate	All	Both	emc0391GB

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	availability to cheatgrass, and less perennial herbaceous cover may increase cheatgrass invasion (Chambers et al. 2007). The removal of cheatgrass by grazing may also increase cheatgrass seed production the following year (Chambers et al. 2007). Cheatgrass invasibility is lowest on sites with relatively high cover of perennial herbaceous species (Chambers et al. 2007). Cheatgrass incursion in sagebrush steppe began in the 1850s with the introduction of domestic livestock, which trampled the biological soil crust that occupied the interspaces between native vegetation (Mack 1981) and facilitated the species' spread. Intact, lichen-dominated biological soil crusts can significantly inhibit germination and root penetration of cheatgrass (Deines et al. 2007), while the presence of cheatgrass can negatively affect biological soil crust richness and cover (Ponzetti et al. 2007). Moss-dominated biological soil crusts may also effect germination of annual grasses, including cheatgrass (Serpe et al. 2006). The diversity, cover and resiliency of biological crusts are positively correlated to low abundance of cheatgrass, low level of soil disturbance and high moss cover (Ponzetti et al. 2007). Shinneman et al. (2008) discovered that herbaceous and biological soil crust cover and species richness and diversity were generally greater on ungrazed than grazed areas in semi-arid shrubsteppe in western Colorado. The recent proclamation by Davies et al. (2011: 3) that "livestock grazing per se is not a stressor threatening the sustainability of the [sagebrush] ecosystem"—that did not account for the direct and indirect contributions of grazing to the spread of cheatgrass—is without merit. The authors failed to consider the role of livestock grazing in altering the outcome of competitive interactions between bunchgrasses and cheatgrass, or the role of disturbance in succession and community assembly in sagebrush steppe (see Reisner 2010). Similarly, even if sagebrush steppe in the Wyoming Basin evolved with moderate herbivory (Mack and Thompson 1982), grazing prescriptions in sage-grouse habitat in Wyoming (e.g., Cagney et al. 2010) that fail to recognize the increasing presence of cheatgrass in the state (Smith and Enloe 2006, factsheet) may inadvertently contribute to its spread.			
418.	Livestock Grazing Management. Developing and implementing grazing systems that are positive or neutral for sage-grouse is complex (Vavra 2005) (and may be impossible). Kuipers (2004) found (weak evidence) that nesting habitat selected by sage-grouse hens, nest success and brood-rearing habitat were associated with greater canopy cover, residual grass, and forb availability, respectively, on sites that were not grazed, or only lightly grazed in spring in Wyoming. Woodward (2006) (c.f. Adams et al. 2004) confirmed some of these findings and noted that reduced grazing/light grazing and/or deferred grazing in sage-grouse nesting habitat in spring lessened impacts on shrubsteppe vegetation and reduced conflicts with sage-grouse. Aldridge et al. (2008) recommended altering grazing practices in sagebrush steppe during times of drought to conserve herbaceous vegetation for sage-grouse.] Some references recommend implementing high intensity, short-duration (rotation) grazing systems to conserve prairie grouse (e.g., Lupis et al. 2006). Notwithstanding the fact that large areas of sagebrush-steppe did not evolve with large, hoofed herbivores (Mack and Thompson 1982), Holechek et al. (1999) reviewed the literature and found that forage production generally did not differ between rotation grazing systems and continuous or season-long grazing. Further,	All	Both	emc0391GB

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	Wolfe et al. (2007) noted that high intensity, short-duration livestock grazing recommended to conserve prairie grouse frequently requires more fencing, which can be negative for sage-grouse. Decades of research by range professionals provide direction to recover depleted bunchgrass communities, restore production and provide cover for sage-grouse and other wildlife species in upland (nesting) and riparian (brood-rearing) areas. Galt et al. (2000) and Holecheck et al. (2010) recommend 25 percent utilization to improve productivity and land health compared to higher utilization levels. To maintain adequate cover in riparian areas, USFS researchers determined that 24-30 percent utilization across the riparian zone will maintain 6" residual height (Clary and Webster 1989). These authors also indicated that, for riparian areas in degraded condition, as much as 15 years rest may be needed for recovery (Clary and Webster 1989). Native bunchgrasses in sagebrush steppe, such as bluebunch wheatgrass and Idaho fescue, also require rest after being grazed during the growing season. Hormay and Talbot (1961) designed rest-rotation grazing to allow recovery after each grazing session, allowing sensitive native bunchgrasses to recover their vigor. Other BLM and USFS researchers have provided guidance for recovery of native bunchgrasses that may require multiple years of rest to restore vigor (Anderson 1991; Mueggler 1975). Anderson and Inouye (2001) working in sagebrush steppe in southern Idaho determined that native perennial grasses were recovering after 45 years of livestock exclusion and the increasing trend of these native grasses was inversely correlated to non-native invasive species such as cheatgrass. Range scientists have determined that stocking rate rather than grazing system is the primary factor affecting rangeland production (Briske et al. 2008; Holechek et al. 1998; Van Poollen and Lacey 1979), yet agencies continue to place emphasis on water developments and increased fencing rather than addressing current forage capacity and landscape constraints. For example, cattle heavily graze riparian areas before moving on to adjacent uplands to seek forage (Pinchak et al. 1991). Deferred rotation grazing resulted in higher use of meadows and there was no correlation of upland presence of cattle with upland water developments (Gillen et al. 1984). Galt et al. (2000) and Holechek et al. (2010) provided recommendations for establishing stocking rates in arid rangelands that recognize the constraints of topography, water availability and forage production on livestock stocking rates. Table 3 presents factors that are applied to align stocking rates with capacity and reduce the risk of excessive grazing. These are then combined with current forage availability available and the consumption rates of livestock to determine the stocking rate.			
419.	Discrete Disturbance from Livestock Grazing. The NTT report considers livestock grazing a "diffuse" disturbance in sage-grouse habitat, which disregards the pronounced effects of grazing around water developments, salting and supplemental feeding areas, and fences. It is important to recognize that livestock infrastructure such as water developments and salt placement are attractants to livestock, resulting in concentrations at these locations that can have similar impacts on sagebrush steppe as other "discrete" disturbances (e.g., oil and gas wells). Fencelines also become travelways for trailing livestock and can have noticeable effects on sagebrush habitat. The concentrated effects of livestock use near water sources is an example of how diffuse grazing can cause discrete disturbance on the landscape. Holechek et al. (2001) stated that, depending on topography, areas of severe degradation, or "sacrifice areas" around water sources, including water developments, can extend from one to several miles from water	All	Both	emc0391GB

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	sources. Holechek et al. (2004), citing others, described the effects of water developments on forage production and native bunchgrasses in Idaho, Montana and New Mexico, noting that nearly all forage is used around water developments, decreasing with increasing distance from water. They reported that, under moderate grazing intensities, forage production was most severely reduced in the zone 0.5 miles from water. The authors noted that "perhaps the greatest problem with additional water developments is degradation of rangeland in high ecological condition" (Holechek et al. 2004: 321). They lamented that "[r]egrettably we have observed the degradation of many publicly owned, high condition rangelands when permanent water developments were installed" (Holechek et al. 2004: 321). Rinehart and Zimmerman (2001) studied the effects of livestock water developments on plant communities in the Little Missouri National Grassland, measuring total species, native bunchgrasses, other perennials, native species, decreasers, vegetation structure, and grass production. Each of these parameters was lowest in the areas near water developments and gradually increased out to one mile, the furthest point measured. Green needlegrass and needle and thread, both bunchgrasses valuable for their height, cover and production, were considered decreasers, while blue grama, a short grass, was an increaser that replaced the taller bunchgrasses in areas closer to water. The effect of this disturbance on factors relevant to sage grouse habitat are tabulated in Table 4. Based on these sources, livestock grazing around water developments may adversely affect an area up to one-mile radius from the development. There is little information on disturbance from grazing and trampling around salt blocks, supplemental feeding areas and fences. It is incumbent on federal agencies to define an area of impact around water developments and other infrastructure in sage-grouse habitat in order to account for these disturbances in the maximum allowable disturbance on the landscape.			
420.	We also want to emphasize the benefits of livestock grazing to the range and to species and that it can and should be used as a tool to manage for the primary threats to sage grouse in Idaho. As the agencies move forward with NEPA analysis, it is critical that they do not start with the assumption that livestock grazing is a threat to sage grouse conservation in management areas. Instead, such analyses should start from the premise that properly-managed livestock grazing is beneficial to greater sage-grouse, as scientific studies have shown. The analyses, therefore, must consider how to incorporate properlymanaged livestock grazing into the protection strategy. Grazing is both compatible and beneficial to sage grouse habitat conservation. This has been proven by independent, peer-reviewed scientific analysis. Ranchers are the stewards of the sage grouse habitat on both the private and public range lands. Allowing ranchers the continued use of public lands without unnecessary restrictions due to the potential listing of a species with such a large habitat encourages this stewardship and prevents fragmentation through development. As seen in many areas of successful rangeland conservation, livestock grazing and habitat conservation go hand in hand. Adequate regulatory mechanisms are already in place through rangeland standards and guides to ensure that grazing is managed for ecosystems and sensitive species.	All	Both	emc0392GB
421.	Without ranchers, who provide an effective line of defense against fire and noxious weeds, who manage forage for optimum	All	Both	emc0392GB

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	production, and who are the primary protectors of open space in the private lands of the west, large areas of greater sage-grouse habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified threats to greater sage-grouse habitat, including wildfire, invasive plants, and urbanization and development.			
422.	Historically, the co-mingling of cattle grazing and sage grouse has been shown to be positive. For example, the greatest number of sage grouse corresponds with the greatest number of livestock grazed. The sage grouse like the small fine grass that is left behind after livestock have eaten off all of the tall grass. Eliminating the old tall grasses in areas allows the birds to eat and see predators that may eat the chicks	All	Both	emc0394GB
423.	well-managed livestock grazing is an etTective and sustainable method for combating several of the most significant threats to sage grouse habitat including fuels reduction to minimize wild fires and to prevent or slow invasive species and conifer proliferation.	All	Both	emc0396GB
424.	As recognized by the BLM in 1M No. 2012-043, grazing can be "used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to the Greater Sage-Grouse and its habitat." The 1M continues, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." According to Natural Resources Conservation Service (NRCS), grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition."	All	Both	emc0396GB
425.	Grazing as a Conservation Tool. PCW supports BLM's recognition that grazing can be used as a conservation tool for greater sage-grouse. Bainter et al. (2009), among other studies, have demonstrated that through implementation of appropriate grazing and vegetation management practices, sagebrush and sage-grouse habitats improve at a higher rate than if grazing is excluded from the landscape. Since the mid-1990s, TOTCO has utilized an intensive rest-rotation and seasonal timing grazing program that has resulted in improvement of all types of seasonal greater sage-grouse habitat as well as resulting in an increase in livestock forage and productivity. Rather than considering retirement of grazing privileges on an allotment when a base property is transferred or the current permittee is willing to retire grazing, BLM should evaluate changing its grazing paradigm and use grazing as a management tool to improve greater sage-grouse habitat rather than eliminating grazing altogether.	All	Both	emc0399GB
426.	Probably fire is greatest danger to the sage grouse: controlled grazing is the greatest protection for controlling fire.	All	Both	emc0403GB
427.	Another recent impact that is happening to these wet meadows is on Blue Mt. there has been an explosion of elk numbers and their uncontrolled grazing is having an impact on these wet areas	All	Both	emc0406GB
428.	Indeed, human disturbances of all sorts, roads, railways, fences, reservoirs, towns, farms, mines, etc. flourished in the early to mid 1900s, and so did the sage-grouse. The mere presence of human activity seems to have little biologically relevant connection to sage-grouse population trends. However, specific human activities appear to correlate positively with GSG population trends. Livestock grazing management, with its associated intensive development of meadows, hayfields, and surface water sources increased markedly in the Great Basin in the late 1800s and early 1900s, and GSG populations boomed. High livestock densities of both sheep and cattle reduced fine fuel loads across the Great Basin, and wildfires were	All	Both	emc0409gb

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	rare and small. High densities of livestock dung also supplied an abundance of insect activity, particularly in closely grazed meadows and riparian areas, and the close grazing stimulated succulent new herbaceous growth and increased the forb component in these meadows and riparian areas, thereby increasing the quantity and quality of the forage supply for sage-grouse. At the same time, concerted predator control was practiced. In fact, predator control was encouraged, subsidized, and implemented on a vast scale by the Federal and State governments. By the mid 1900s, Federal and State regulations were implemented and all of the grazing management practices discussed above were controlled and moderated. The GSG population boom moderated at about the same time. By the late 1960s, livestock numbers and grazing levels were significantly scaled back across the west, and predator control programs were largely curtailed. Fire fuel levels increased, and the incidence of large-scale wildfires rose exponentially. GSG population trends reversed and started to rapidly decline. Thus, intensive livestock management which diminished the frequency and size of wildfires, and concerted predator control which reduced GSG loses to these killers, are management actions in the Great Basin that seem to be highly relevant to the biology of the GSG and help explain the trajectory of their populations over time. As shown in Figure 1, it is reasonable to assume that a return to effective management to increase livestock grazing levels, reduce fire fuel loads and wildfire impacts, and increase predator control would result in another significant upward trend in GSG populations. In contrast, proposed GSG conservation measures to provide heavier cover levels through further livestock grazing reductions, and the lack of conservation measures to address ever increasing predation levels, are a prescription to assure that GSG populations continue to decline. Heavier cover for GSG translates to higher fire fuel loads across the landscape, and substantial fuel loads make large-scale wildfires inevitable in many sagebrush communities. Repeat burns increase the likelihood that plant communities will shift toward cheatgrass dominance, which in turn increases wildfire frequency, eliminating the ability of sagebrush communities to re-establish. Thus, conservation measures that intend to benefit GSG by providing them with more hiding cover will ultimately harm the species by converting significant swaths of existing habitat to annual grasslands that provide no habitat value for GSG. This will concentrate the remaining birds in an ever shrinking area, making them more vulnerable to expanding predator populations.			
429.	We believe that prescriptive grazing is and historically has been a major factor in maintaining the health and sustainability of our lands in the west. We believe this to be a recognized and proven method that. recognized and used as a tool will promote Sage Grouse habitat restoration and preservation. As grazing is one ofthe strongest tools we possess, we believe it is absolutely necessary that public lands ranching involvement and input into the EIS/SEIS and later the amendment process is crucial.	All	Both	emc0410GB
430.	If sage-grouse are to be conserved, BLM's management paradigms and on-the-ground actions must immediately be changed. Habitats must not be sacrificed. The National Technical Team report underplays the serious ubiquitous pervasive threat to sage-grouse habitats posed by domestic livestock grazing across nearly all public lands. The Report and associated IMs continue near-status quo management for livestock and many other threats. The IM is riddled with loopholes, and very weak and ineffective provisions that are at times weaker than the NTT. For example, with livestock grazing where there is no requirement that anything at all actually has to change on the ground. For other threats, the NTT and Memos fall back on largely the same lists of BMPs and Standard Operating Procedures that have helped caused the demise of sage-grouse habitats over the years. Some oil ad gas provisions may be better than BLM had previously put on paper but applied only in	All	Both	emc0411GB

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	Priority areas.			
431.	BLM has a long history of making lofty promises of better management and conservation, then never implementing them. For example, in 2004, BLM's National Sage-grouse Habitat Conservation Strategy) promised under Guidance for the management of sagebrush plant communities for sagegrouse: - Avoid constructing livestock management facilities (i.e. corrals, tanks, troughs, pipelines, fences, etc.) next to leks. - Design and locate the placement of fences for livestock so as to not disturb important sagegrouse habitat areas. - Consider seasonal closures to protect priority sage-grouse habitat if other alternatives will not achieve desired objectives. - Use grazing practices that promote the growth and persistence of native shrubs, grasses and forbs needed by sage-grouse for seasonal food and concealment - Maintain seeps, springs, wet meadows, and riparian vegetation in a functional and diverse condition for young sage-grouse. - Maintain sagebrush understory and diversity adjacent to crucial season sage-grouse habitat unless removal is necessary to achieve sage-grouse habitat objective. - Where other grazing practices are not achieving, or cannot achieve, the desired objectives, a short term option may be livestock exclusion. There were also some measures for oil and gas and geothermal development that have also been routinely ignored by the agency: - Avoid the impact of construction and operations by not placing mines, oil and gas and geothermal drilling sites and facilities, roads, and mineral material disposal sites in or next to sensitive habitats such as sage-grouse leks, nesting, brood rearing, breeding, or wintering habitat. - Whenever feasible and environmentally preferred, avoid surface occupancy by roads powerlines, fences, or other structures adjacent to occupied leks - Consider seasonal closures to protect priority sage grouse habitat if other alternatives will not achieve the desired objective. So BLM had already adopted some requirements to protect sagebrush habitats in permits for grazing recreation, mining, and oil and gas. The first energy provision above has been significantly weakened in the most recent iteration Priority scheme that allows more development to occur. The loose wording that always allows BLM an out so it can cave into industry has not been tightened up. Some of the provisions, such as relating to springs and seeps for Oil and Gas are not even included for geothermal in the IM. BLM's Conservation Plan appears to provide broader protection for these habitats (see above). Now BLM uses maintain enhance, or restore only for PPH. None of this wording applies to PGH in the IM. So the situation is immediately worse for General habitat than under the Conservation Plan. Now BLM is only supposed to reduce and mitigate to the extent practical. The IM's appalling General Habitat provisions appear to violate BLM's 2004 Conservation Plan.	All	BLM	emc0411GB
432.	Wildfire, invasion of non-native plant species and livestock grazing work synergistically. Yet BLM and other agencies repeatedly try to point to fire and invasive species as threats divorced from livestock grazing disturbance, the most pervasive ecological stress across all parts of the sage-grouse range. Fires are occurring more frequently, and the size and intensity of fires are increasing. Fires reduce or eliminate shrubs, disturb soils, destroy microbiotic crusts, and release nutrients that allow cheatgrass and other weeds to thrive. The end result in grazed landscapes is a paucity of shrub cover, few forbs, a shorter period of green plant material (as fires result in hotter, drier sites with little vegetation to trap snow, shade ground, and block wind), and a longer fire season.	All	Both	emc0411GB
433.	Cattle evolved in, and are adapted, to, cool, moist climates and are not native to the arid West (Mack and Thompson 1982). Cattle feed preferentially on native grasses and forbs reducing or eliminating critical components of sage-grouse habitats. Historic and chronic ongoing livestock grazing eliminates or reduce food, nesting cover and cover from predators.	All	Both	emc0411GB

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	Livestock and management activities disturb and displace sage-grouse including in lek, nesting and winter habitats.Through degradation of the native plant communities, and trampling, displacement, compaction, erosion, of soils and microbiotic crusts, the livestock create ideal sites for weed infestation. Livestock are also vectors of weed spread. Weeds thrive in livestock manure nutrients (Belsky and Gelbard 2000). Impacts are intensified by livestock facilities like fences, water troughs, supplemental feeding/salting sites, yet agencies promote all of these actions, and continue to tout these actions as beneficial and include them in laundry lists of BMPs. Many of these actions are conducted with minimal or piecemeal NEPA. In reality, such practices are overwhelmingly beneficial only to livestock, and serve to shift and intensify disturbance into remnant less grazed areas.			
434.	Agencies have focused overwhelming on forage grass for livestock to eat and ignored many other stresses on the sagebrush ecosystem and biological conflicts and harms that are caused by livestock grazing disturbance to species' habitats. This includes physical disturbance and displacement due to the presence of livestock, and a battery of other livestock-related disturbances to ecosystem components ranging from alteration of the complexity of sagebrush structure to trampling pulverizing microbiotic crusts.	All	Both	emc0411GB
435.	Now BLM in this sage-grouse EIS is stating that it is indeed going to address allocations. As part of the process of amending the Land Use Plans in this EIS process, BLM must fully consider causal factors of weed invasions and fuels problems like grazing and the plethora of BLM's own treatments in making these allocations. It must change allocations, like livestock grazing, that promote weeds and flashy fine fuels like cheatgrass. BLM must also adopt an integrated weed management strategy, rather than the current Spray and Walk Away approach that ignores causes of weeds and fails to provide integrated weed/invasive species management. BLM treatment relies overwhelmingly on futile use of expensive chemical herbicides.	All	BLM	emc0411GB
436.	BLM must re-examine all activity plan decisions that serve as the basis for continued management actions. Agencies must also look at much more than a ballpark estimate of forage in making allocations. Allocations, and findings of suitability or non-suitability for any continued grazing disturbance use must include detailed analysis of conflicts with sage-grouse habitat needs for space and cover, highlighting the species need for secure habitats free of disturbance. In any areas that may remain grazed after this suitability analysis is applied, levels of use to ensure the habitat characteristics that grouse actually require such as residual grass cover at nests must be applied. Sage-grouse must be guaranteed habitats secure from disturbance during lekking, nesting, brood rearing and wintering periods.	All	BLM	emc0411GB
437.	Across many portions of the range of sage-grouse, livestock stocking rates are the results of old adjudication process, and AUMs never have been adequately reduced to levels that the land could be expected to sustain, even under the limited forage worldview of range science. Others derive from old settlements of rancher Appeals of BLM decisions. This means that ranchers often got more livestock, more facilities, and more forage seedings removing sagebrush habitat and other projects than BLM had even recommended in many of those decisions. The BLM MFPs and vintage RMPs typically have separate Rangeland Program Summaries or documents with lists of allotments and AUMs, often with reductions proposed. Some of these had AUM tallies that were based on Ecological Site Inventories and forage calculations from the early late 1970s-1980s. These detailed ESI baseline studies have rarely ever been repeated. Many of the AUM reductions then proposed were never fully carried out.	All	BLM	emc0411GB
438.	The primary, and often only, annual barometer of livestock use monitored by BLM is utilization. Utilization is based on	All	BLM	emc0411GB

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	aboveground biomass of grass plants, i.e. weight of the plant material and not height. Most of the weight of a native bunchgrass grass plant is towards the base of the plant. So 40% utilization often means that a plant that stands 12 inches tall can be grazed down to 3-4 inches in height and still be measured as having only 40% use. This height is too low to provide the necessary residual screening cover to conceal sage-grouse nests from visual and scent predators. Plus utilization is averaged across the landscape, so 40% average utilization means many plants receive much greater use. Those higher use levels are harmful to the crown of the bunchgrass plant, which is exposed to winter freezing and baking in hot sun. Harms to the plant from such use levels may be even worse during the active and critical growing period for the plant. Changes in species composition occur over time, and larger or grazing-sensitive grasses are depleted. Sheridan CEQ 1986, Mack and Thompson (1982), Anderson (1991), Jarbidge AMS (2007), U.S. Forest Service Utilization Gauge, Anderson 1991 BLM Technical Bulletin. In lands that have become depleted by historical grazing, and then are faced with continued annual chronic grazing disturbance, many larger-statured grasses are missing. So the plant community composition has been altered and depleted - with smaller statured increaser species replacing larger grasses (a symptom of desertification, see Sheridan CEQ 1986). Yet BLM often overlooks the utilization of the smaller grasses such as small native bluegrasses Poa that greens up with fall rains, and measures use only on scattered remnant larger grasses. Plus, BLM typically averages utilization over 40 or 50 grass plants. This means that if the average utilization at a site is recorded as 40% - some plants are likely grazed to levels of 70% or more, which is quite damaging and can lead to injury, weakening/lack of vigor or death of the plant.			
439.	BLM avoids monitoring in areas receiving heavier levels of livestock disturbance. So the heavier use areas over large portions of the landscape go completely unexamined. Although BLM has monitoring manuals and methodologies, the truth is that often monitoring sites are agreed upon with ranchers, are rarely if ever actually random, and are selected to purposefully avoid areas of heavier livestock use. So BLM's high utilization levels, combined with non-random cherry-picked monitoring sites, means that vast areas of degraded lands are not being monitored, and only one component of the environment (grass biomass removed) is measured when monitoring does occur. No use standards of any kind are ever applied to limit upland trampling impacts and damage to soils and microbiotic crusts.Even though some BLM monitoring guidance recommends monitoring at damaged areas because they are most vulnerable to weeds, soil erosion, and other threats, and serve as warning signs for ecological deterioration this does not happen. Even when BLM calls monitoring random, it is often far from being random. See Attached WWP 2011 critique of Winnemucca BLM's 2011 non-random random ecological monitoring. Fundamentals of Rangeland Health (FRH) Rangeland Health Assessments are also done at cherrypicked representative sites with the areas suffering more damage also purposefully avoided. Many current upland Rangeland Health Assessment methods fail to include sufficient indicators and data required to understand sage-grouse habitat disturbance and the ecological health and biodiversity of the sagebrush ecosystem. The Forest Service, similarly, uses cherry-picked representative areas. See WWP Ely Westside Appeal. Various monitoring methods, including even the ESI conducted in the Jarbidge, tend to seek out more uniform "deal discrete vegetation community types and avoid the very often mottled, and varied communities that have resulted from more intensive use, past BLM treatments, etc. These more disturbed or altered sites are likely to contain more weeds and more degraded conditions. So again the results often over-represent better condition areas while ignoring degraded lands	All	BLM	emc0411GB
440.	BLM also practices forage mining through extending facilities and salt and supplements. Areas closer to watering sites, flatter	All	Both	emc0411GB

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	terrain, or other areas frequented by livestock become depleted. But rather than cutting livestock numbers, BLM has instead incrementally extended water systems and thus extended degradation of sagebrush upland sites, built more fences to enable more intensive use in ncreasingly depleted lands, and also killed sagebrush and trees to try to produce more forage and maximize continued livestock grazing numbers. This has enabled more intensive livestock disturbance of remnant better condition areas of the sagebrush uplands across public lands. Meanwhile, there is minimal, if any, improvement in the depleted sites. Livestock facilities have intensified use in many areas in recent decades, while the areas already highly impacted and depleted have not recovered. These sites are vulnerable to, and often are undergoing, weed invasions. Thus, this system of keeping as many cattle/sheep on the land as possible without cutting AUMs has resulted in incremental depletion equivalent to forage mining. Along with forage mining goes the need for ever more treatments. BLM has also aggressively manipulated and treated native communities rather than allowing passive restoration of damaged understories to occur. Rachel Carson in Silent Spring described the war on sagebrush that began in the late 1950s, and continued in the open for livestock forage for decades. This War continues to the present, papered over with misleading terms like fuels treatment, treatment of decadent sagebrush, habitat improvement project, but the end result is the same.			
441.	Given all of these concerns (and there are many more) how is BLM going to allocate lands for continued grazing use, and at what level of stocking allocation, under this process? How will BLM and the Forest determine the suitability of lands for continued grazing or other uses in amending these Plans? This must be done fully and fairly, and a clear honest fair science-based process established to do so. A starting place for one part of this analysis would be an honestly conducted capability and suitability analysis, incorporating a full and fair risk assessment detailing how livestock grazing disturbance is a causal factor for weeds, loss of native species, loss of microbiotic crusts, etc. The degree of risk to lands if such disturbance is continued must be determined. See WWP 2011 Ely Westside Rangeland EIS Appeal, detailing how dishonest agency capability and suitability analyses have been conducted. That does not mean, however, that the underlying concept is flawed. A strengthened capability and suitability analysis and risk assessment process, done honestly and not contrived to get results to support the status quo, must be part of this process.	All	Both	emc0411GB
442.	What can realistically produce the most significant change in 20 years in the chronically grazed landscapes across nearly all the western public lands? Realistically, removing livestock grazing disturbance is the only restoration action that can rapidly promote recovery of existing sagebrush communities across landscapes, and that can provide the best basis for effective recovery of any actively restored areas. It thus provides the best taxpayer investment in restoration. Removal of grazing would immediately produce positive changes like increased cover of native species, no intrusion of livestock into critical seasonal habitat space required by sage-grouse, ecological processes that are less disrupted, termination of grazing management activity disturbance, dramatic reduction in livestock carcasses and carrion, and other subsidies that promote nest predators and mesopredators, Plus the drain on taxpayers from subsidizing livestock grazing and attempts to deal with its constant habitat degradation would end.	All	Both	emc0411GB
443.	BLM buries livestock grazing under a catch-all of rangeland management at this link http://www.blm.gov/id/st/en/sage-grouse_west-RMP.html despite livestock grazing being a primary cause of degradation and adversely impacting many of the "preliminary categories" for the EIS planning including fire/fuels, veg/invasive species, wildlife/special status species, riparian resources, soil and water conditions, wilderness characteristics, visual resources [and	All	BLM	emc0411GB

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	the degree of unnatural or grazing-caused contrasts], wild horses and worsening the ecological impacts of climate change and desertification. We stress that nearly 90% of riparian areas have been lost or highly altered. The full degree and severity of loss and desertification of sag-grouse habitats that has resulted must be fully examined. Understanding the degree and severity of loss in all sage-grouse habitats is necessary to understand how greatly reduced habitats currently are.			
444.	In order to understand the baseline conditions on BLM and other public lands, agencies must incorporate all land uses and influences (or change agents) on their lands. Without a proper science based understanding of these conditions, the consequences of land management actions on sage grouse cannot be fully understood. The BLM manages livestock grazing on 157 million of its 245 million acres of land (or 64%). Nearly all BLM land in the sagebrush biome is grazed. The adverse effects of livestock grazing on plant communities, soil properties, erosion, invasive and sensitive species and wildlife habitat have long been recognized in the scientific community. Therefore, sound science dictates that livestock grazing must be included as a change agent on BLM lands. Without specifically including livestock grazing as a primary change agent, the utility of all assessments and management plans will be called into question.The BLM, through its monitoring, past studies and analyses, retain data that characterizes grazing influences. Additionally, there has been a wealth of data collected on grazing allotments over a long period of time. Regardless of the scale at which the data was collected, it can be re-scaled to the landscape level. Many different data sets, collected at a variety of scales, can be scaled up and down. Data such as point data for fires have been scaled up and utilized in BLM's Rapid Ecological Assessments. The BLM needs to utilize their existing data to integrate the effects of cattle grazing on all resource values and grazing impacts must be assessed with a scientifically valid method. Without a thorough understanding of the influence of grazing on BLM lands, critical habitats and listed species cannot be accurately assessed, making it impossible for the agency to develop plans to mitigate and manage sensitive environments, particularly for sage grouse, riparian habitat, or habitat for other listed plant and animal species.	All	BLM	emc0411GB
445.	Livestock grazing is not merely a component of 'herbivory' a catchall for any species that utilize rangelands for forage. Livestock grazing is specific, measurable, allotted and controlled by agency protocols and management strategy. Lumping of all foragers into one category does not address the tremendous influence of livestock grazing as a landscape change agent. Wildlife grazing, compared to livestock grazing, on most allotments is not significant and BLM is remiss in categorizing wildlife and cattle together. BLM can estimate wildlife grazing separate from livestock using data obtained from state fish and game agency inventories or assessments of big game populations by management units.	All	BLM	emc0411GB
446.	Where Are All Existing Leases/Permits/Valid Existing Rights? What Are They? Who Holds Them? Which Ones Can Be Canceled, or Terminated? How Would This Be Done? Can't All Be Immediately Amended? Agencies must carefully catalogue all existing permits, leases, etc. and provide information on their interface or overlap with sage-grouse habitats. Detailed mapping and analysis of current ecological conditions must be provided. Then, both in the Interim and as a direct outcome of this process, these permits, leases, etc. should be amended, bought back, canceled, or otherwise addressed.	All	Both	emc0411GB
447.	Despite livestock grazing (and invasive species and other threats it grazing causes) being recognized as a threat, the Wyoming basin ecoregional Assessment failed to analyze the risk and threat from grazing. Despite exotic seedings converting sagebrush to grasses and spread of invasive annual grasses cheatgrass being admitted to be threats to the Wyoming Basin already circa 2006, BLM and USFWS have recently been trying to segregate out East and West regions, in order to minimize acknowledging pervasive disturbances across the sagebrush biome, and to try to confuse the sage-grouse	All	Both	emc0411GB

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	ESA Listing debate.			
448.	Below is another excerpt from the WBEA, with our comments [in brackets] illustrating how grazing must be fully incorporated into this 2012 sage-grouse EIS process. Decisions about which potential threats to address in a particular assessment area may be based on any of several criteria, including: Spatial extent or pervasiveness of the threat across the ecoregion; [Grazing disturbance and its lethal infrastructure is pervasive across all sage-grouse habitats]. Capability to quantify and map the threat; [BLM can identify, analyze, map and address grazingcaused degradation of soils, vegetation, microbiotic crusts, fences, water developments, destruction of sagebrush in treatments, weeds, roads linked to livestock facilities if it wants to. See WWP critique of Stiver et al. 2010 HAF Report (referenced in NTT IM) and its omissions for suggestions. Agreement among those conducting the assessment about the relative importance of the threat to sagebrush habitats in the ecoregion; [Grazing is a major threat that synergistically acts with, and often causes, weed invasions and altered fire cycles, and impacts all components of the sagebrush landscape and all seasonal habitats used by sage-grouse. So if invasive species and fire are threats, then grazing must be a prominent threat as well]. Available resources to address the threat. [Livestock grazing removal will allow passive restoration to occur, and protect tax payer investments in active restoration. It will greatly free up resources, save large sums of tax dollars. Right now tens of millions of dollars are being thrown annually all at projects with minimal benefit and that in fact are often fragmenting and degrading sage-grouse habitats even more]. Timeframe required to implement effective treatments across the ecoregion; [Grazing could be phased out in many areas in five years or less, if there was a political will, and large amounts of tax dollars would be saved. Further, many parties such as foreign-owned gold mines in Nevada, Oil and Gas in Wyoming and SNWA in Nevada hold huge public lands grazing permits. Ending their grazing disturbance and degradation could readily be part of mitigation for damage to sagebrush habitats being done by these same parties, who acquired base properties along with which came the grazing permits. Often, as in the case of mines or energy ndustry acquired private lands to keep ranchers from complaining about losses of water or other values harmed by the footprint of the mining or oil and Gas development. Instead of leasing public lands grazing to locally powerful ranchers to curry political favor, these entities must end grazing as partial mitigation for the harms being caused. Also, many permits are now held by hobby ranchers, or wealthy individuals such as the Hilton hotel magnate permits that are a great concern in Bi-State Mono Basin lands in the Bodie California-Nevada region. Another example is large grazing permits in Idaho's Pahsimeroi controlled by hobby ranchers]. Costs versus benefits of addressing the threat; [The environmental benefits of terminating grazing disturbance in western watersheds and ecosystems are tremendous increased watershed health, more abundant clean water, greatly reduced weed spread, reduced herbicide use, more effective integrated weed treatments, increased carbon sequestration, decreased soil erosion in wind and water (including dust that speeds early melting of snowpacks), removal of disturbance of tens of thousands of domestic livestock turned out each spring on top of nesting sage-grouse, and/or intruding into winter habitats and subsidizing mesopredators, cessation of livestock trampling impacts causing desiccation and loss of springbrook/riparian areas critical for broods, recovery of understory components to support nesting and brood rearing sage-grouse, removal of large source of mesopredator subsidies carrion, feed/supplement, sub-optimal habitat conditions increasing predator success for both visual and scent predators, etc]. Potential effects of addressing the threats on non-target species. [Many of the same beneficial effects of removing grazing for sage-grouse would apply across sagebrush habitats for other species, too. Plus the endless push for	All	Both	emc0411GB

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	reatments to kill woody vegetation to try to grow more grass that are resulting in fragmentation, weeds, and further loss of sagebrush especially important to species like the pygmy rabbit or sage sparrow would end}.			
449.	In the embargoed WBEA assessment, the BLM citing Connelly et al. 2004 described the pervasive adverse impact of livestock grazing disturbances. Thus, its influence on sage-grouse habitat is perhaps the most pervasive of any land management practice. However, we did not have data available across the study area on stocking rates and seasons of use (Appendix 6). Effects of livestock on sage-grouse habitat include removal of the herbaceous understory that supports insect prey and of forbs used as forage by hens, and concealment of nests from predators; moreover, livestock may trample sage-grouse nests (see Beck and Mitchell [2000] and Rowland [2004] for summaries of effects of livestock grazing on sage-grouse) In the WBEA Report Page A5-3 Screen 31: Sage-grouse - Grazing was assigned a threat of 1.We could not evaluate the potential effects of livestock grazing--the most pervasive land use in the sagebrush ecosystems in the Wyoming Basins because of the lack of area-wide spatial data on animal unit months, stocking rates, grazing systems, and allotments for public lands managed by the USDI Bureau of Land Management (BLM), USDA Forest Service, and other federal agencies. Moreover, some of the available data pertaining to livestock grazing are reported inconsistently across administrative units, thus precluding the use of these data in our assessment. Consequently, the potential influences of livestock grazing were not evaluated either in our human footprint analysis or our species models So BLM claimed it could not assess grazing because it didn't know how many AUMs were on the books, or being grazed. Just as with the later REA, this of course was false. We present this information so that BLM cannot again claim, at the time of the DEISs for this sage-grouse process, that it just didn't have time to assemble enough information on grazing. If BLM really can't assess grazing impacts, then it can't control impacts, and grazing permits should be terminated immediately.	All	BLM	emc0411GB
450.	Congressional Riders and other legislated actions that threaten sage-grouse have resulted from political pressure from the livestock industry. Public lands ranchers have thwarted adequate scientific and environmental review and management of grazing disturbance actions across BLM and Forest lands. A long-standing example is the Rescissions Act, where 10 year grazing permits can be renewed without any environmental review at all, for another decade – as long as no changes are made to the permits. So this cements in place status quo harmful agency management actions of imposing herds of cows and sheep on top of nesting sage-grouse, hot season use on summer brood rearing habitats, keeping lethal fences and disease-promoting water facilities in place while also often expanding facilities with minimal NEPA, continued overstocking, etc. BLM and the Forest must provide detailed analyses of how many such permit authorizations are currently and during the course of this process, will foreseeably be made. Is BLM going to be issuing status quo Rider permits with status quo provisions through 2014, or whenever this EIS process is completed?	All	Both	emc0411GB
451.	Agencies do not act in the interest of sagebrush ecosystems when it comes to grazing disturbance. Across areas like the vast Humboldt-Toiyabe Forest, grazing is the overwhelming land/water disturbance factor promoting weed invasions, habitat alteration and loss, including erosion, headcutting, and desertification of very scarce and precious springs, seeps, and the small streams that characterize these often rugged water-limited Forest wild lands. As an example, in the Santa Rosa District near the Oregon-Nevada border, a grazing EIS imposed loose, uncertain adaptive management, and retained every single AUM/HM on the land. So in this very important sage-grouse habitat, there is significant uncertainty about how grazing will be conducted. The Forest moved three allotments with sage-grouse habitat that had been Vacant, including lands in Wilderness,	All	Fs	emc0411GB

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	into the completely Open grazing category. This also included newly acquired land that was supposed to have been purchased for "conservation" purposes with SNPLMA funds. In the Ely Westside EIS, the Forest also attempted Opening a Close allotment that had long been Closed under the Forest Plan, but where the agency had actually allowed for over five years illegal grazing in habitat for the nearly extirpated Quinn sage-grouse PMU. As a result of this relentless grazing, on top of an area that was burned and should have been undergoing passive restoration, a cheatgrass weedland has resulted. So even in places where sage-grouse are known to be very low in number (see NDOW 2004 Sage Grouse Plan discussion of Quinn PMU) agencies sacrifice habitats to placate industry to the maximum degree possible. We present these examples, showing that even though a Forest Plan Closes an allotment, the Forest may act illegally to placate or please powerful livestock interests. This illustrates the disconnect between lofty claims made on paper, and what actually occurs on the public land. At present, there is no sound system to monitor and vet agency compliance with its own regulations, including how they are complying with any commitments made to sage-grouse conservation. This EIS process must establish a system to do so.			
452.	Then the real analysis would come with establishing a valid current baseline of ecological conditions so that critically important conservation measures and restoration actions could be applied, and in drawing boundaries and integrating management for large ACECs that encompass habitats necessary to conserve, enhance and restore populations. Current sage-grouse abundance and distribution must be expanded. In these areas, BLM must require that ongoing disturbance be minimized, and that disturbance be eliminated in sensitive areas. The ACECs must also encompass restoration areas and specific actions necessary to support populations that can expand and be viable over the mid and long term. Passive restoration, such as removing livestock grazing disturbance, which produces benefits very rapidly and is much less expensive over large areas than risky manipulation schemes, must be conducted in areas with remaining native sagebrush vegetation components occupied by sage-grouse. Active restoration must focus on removal and rehab of fences, water lines and troughs, linked roading, and numerous other disturbances, and seeding sagebrush and other native species to expand habitats.	All	Both	emc0411GB
453.	This EIS process uses yet another broad category to better enable agencies to mask declines, or claim they are addressing threats. It broadly breaks sage-grouse populations into East and West, and then claims that there are different threats in these different regions. This ignores chronic degradation and threats like livestock grazing disturbance that are promoting invasive species which promote frequent fires, or that causes degradation of all components of ecosystems in both east and west. Grazing threats extend across the sagebrush biome. Areas that were once claimed to be immune from cheatgrass are now facing cheatgrass invasion in areas of livestock, fire, or other disturbances. Portions of Wyoming now are facing cheatgrass invasion and spread. In reality, continuing death by a thousands cuts of sage-grouse habitat is occurring biome-wide.	All	Both	emc0411GB
454.	BLM states: The LUP amendments will contain decisions that are allocative and/or prescriptive to conserve sage-grouse habitat as well as objectives and management actions to restore, enhance, and improve greater sage-grouse habitat. We have previously discussed how BLM avoids making or changing allocations. What is the difference between an allocative and a prescriptive use? BLM must do both at the same time. Both allocative and prescriptive changes must occur together for this process to be effective and action happen in time to stop further declines. For example, BLM cannot substantially reduce	All	BLM	emc0411GB

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	grazing standards to provide for 9 inch nesting cover for sage-grouse, while keeping AUMs/stocking in grazing allotments the same. Risk assessments must be conducted and findings on continued suitability of lands for any grazing use must be made. Then, if grazing continues, necessary reductions in livestock to allow this level of grass nesting cover must be made. It is unacceptable to shift impacts into other areas - for example, onto segregated General or Non habitats, to achieve a small degree of hoped-for "improvement" in a Priority zone. If this is the approach BLM is contemplating with its wording here, sacrificing those other areas will not protect sage-grouse, and adverse impacts will occur and boomerang back onto the sage-grouse that are supposed to somehow prosper in only a portion of their occupied and required habitat, i.e. the limited Priority areas. Is BLM just planning the smokescreen of avoiding allocation changes by applying "prescriptions" where grazing use will be rotated in an easterly direction, rather than a westerly direction each year - or something similar? Or planning to allow industrial wind development to proceed in sensitive occupied habitats by churning out a 20 page list of "prescriptions" for developers to follow?			
455.	Weeds destroy the ability of the native species to recover, especially with any continued disturbance. Disturbances like grazing must be removed so sagebrush communities can withstand invasive species and the unraveling that ensues following cheatgrass/medusahead dominance. This is supported by the ICBEMP science of over a decade ago that has been ignored by federal agencies.	All	BLM	emc0411GB
456.	BLM pays lip service to WSA Interim Management measures. BLM must identify sources of degradation and impairment in WSAs and Wilderness related to livestock grazing, water developments, fences, salting/supplement feeding, roading, seasons of use interfering with sage-grouse nesting and native plant health, and other disturbances and degradation. It must act to remove these as part of this process, as livestock facilities and roading adversely impact sagebrush communities and thus sage-grouse habitats and populations. BLM must fully recognize that the values of sagebrush landscapes are now much greater than at the time the old BLM Wilderness inventories were conducted. BLM must carefully determine how the natural values of WSAs are enhanced and elevated by the WSA supporting thriving populations of sage-grouse. Sage-grouse management complements management for wild untrammeled landscapes. BLM must identify actions to promote this. What livestock facilities were present when the WSA was inventoried? How does this compare to those now present? Which facilities are harming natural and other values - and which must be removed due to degradation and harms/impairment including of natural features, and sage-grouse habitats and populations?	All	BLM	emc0411GB
457.	There is great variation between states, and even within states like Nevada in how the FRH are applied. As part of this process, BLM must greatly upgrade, strengthen and increase the scientific rigor of how it carries out FRH processes in each state/area. There are greatly inadequate state or even RAC area S&Gs that do not appear to meet the legal requirements of the BLM grazing regulations at 43 CFR 4180. Example: Elko (Northeast NV) RAC standards are vague, weak, and allow all manner of ecological disturbances to go unaddressed. BLM must adopt much more rigorous Standards and Guides at the state/area level that are fully compliant with its FRH regulations.	All	BLM	emc0411GB
458.	BLM must conduct current, honest and detailed S&G assessments across all parts of the sagebrush biome, including areas where there are existing inadequate S&G assessments, BLM must conduct new S&G assessments. BLM must systematically critique its existing S&G assessments.	All	BLM	emc0411GB
459.	Risk and vulnerability to cheatgrass and other weed invasions, the degree and severity of existing desertification and	All	Both	emc0411GB

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	degradation, and full and fair assessment of grazing-impacted land areas - not just "ideal" areas distant from livestock disturbance zones - must be competently conducted. See also discussion of the Stiver et al 2010 HAF.			
460.	For over a decade, WWP has been asking BLM not to build post-wildfire fences that enable livestock grazing on nearly every unburned acre. The agency should instead close existing partially burned pastures entirely. Sage-grouse have just lost critical habitats in a fire. Then the grouse, in the remaining habitat they have left, suffer grazing disturbance (often intensified) as well as new lethal fences off so that intensive disturbance is perpetuated. Agencies must adapt to fire by providing more ungrazed, undisturbed habitat.	All	BLM	emc0411GB
461.	All the energy development, mining, roading, veg treatments that result in cumulative adverse impacts to sage-grouse play out on a landscape that is near-universally subject to annual grazing disturbance from domestic livestock. Sagebrush lands have been industrialized with many harmful facilities put in place to facilitate and/or intensify grazing disturbance. Likewise, new developments will only add to the sagebrush habitat intrusion, disturbance and losses. The cumulative impacts of disturbances must be honestly examined in any RFDS. This scenario must be conducted for livestock grazing across agency lands, including stocking levels and lands suitable for, or open to, grazing use. The impacts of these actions related to grazing disturbances and developments, and the threats posed to all sage-grouse seasonal habitats, must be fully examined.	All	Both	emc0411GB
462.	A valid and complete environmental baseline of habitat quality, quantity and threats must be provided for the effects of development scenarios to be understood. This effort must first answer basic questions such as: How much loss of critical habitat components has already occurred - including desertification and loss of site potential, water tables, etc.? How much further loss of adequate sagebrush understories, microbiotic crusts and structurally complex sagebrush cover will occur if all the livestock water pipelines, fences, near-status quo stocking rates, high use levels/standards are allowed to continue- and the new developments under the Scenario are allowed to occur? How much irreversible loss and harm (such as cheatgrass or medusahead invasion) will occur? In arid sagebrush lands, placing water developments in uplands results in a bulls-eye pattern of depletion emanating outward from the water sources (with variations taking topography into account). With continued high stocking, and high use levels, no controls on trampling disturbance, and retention of existing livestock facilities - the depletion continues and recovery of damaged areas is not possible. Continuing or expanding facilities, or renewing grazing permits at levels above the use that has actually been occurring, must be fully taken into consideration here. All of this is of course dependent on what the current baseline and environmental conditions are, including how severe current threats and risks of continuing disturbance activities may be to all components of all sage-grouse seasonal habitats and lands necessary for restoration.	All	Both	emc0411GB
463.	Agencies must also consider the threat of habitat loss and amount of risk of irreversible weed invasion and habitat fragmentation associated with treatment disturbance, and must fully consider the uncertainty that any substantial positive recovery may occur, and its pace. If agencies propose to kill, alter, thin, destroy mature of old growth sagebrush communities in vegetation manipulation projects, then how long will it take for a plant community with similar characteristics to recover? How does continued grazing disturbance slow, retard, or alter recovery for decades or centuries to come? How does continued grazing disturbance promote cheatgrass or other weeds, effectively truncating succession so that hoped-for recovery does not happen? Examples: Trampling seedlings, browsing/breakage of sagebrush cover, alteration of understory grasses and forbs, disruption of microbiotic crusts, etc. Current science-based recovery intervals must be	All	Both	emc0411GB

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	used. So many of the existing projects including those of the past decade and continuing up to the present have been conducted based on false and now disprove claims of short historical disturbance intervals, and short claimed recovery intervals that had been erroneously promoted by Winward, Miller, and others with a range background. See Welch and Criddle (2003), Baker (2006), Baker Chapter in Knick and Connelly (2009). How many treatments exhibit much slower recovery of sagebrush, forb, microbiotic crust, and other community components than predicted?			
464.	For the past couple of years, agencies have been using another category to try to separate out populations, and minimize the importance of losses to the sagebrush habitats. This is the effort to segregate greater sage-grouse into eastern vs. western portions of the range on the basis of claims that grouse face different threats in different parts of their range. USFWS used this artifice in defending its toothless Warranted but Precluded Finding in litigation, and took it to absurd lengths in its arguments there. First, many of the same threats occur across the range - livestock grazing, roads no matter what the cause, invasive species, mining. Second, increasingly renewable energy threats with many of the same impacts as oil and gas are accelerating in the western portion of the species range, and mining is exploding in northern and central Nevada and some other western areas. Plus hundreds of thousands of acres are now being leased for oil and gas development all over Nevada. Renewable energy examples: Major industrial wind farm on Steens Mountain Oregon and new transmission lines, major new transmission lines like Gateway and MSTI, geothermal development often by foreign entities (McGinness Hills and other areas), massive geothermal leasing proposals are appearing - for over 500,000 acres on Bridgeport Ranger District lands and elsewhere in NV. Mining is expanding into new areas where sage-grouse populations are already barely hanging on, and new mining is proposed in areas with larger populations, as well. In the east, weeds like cheatgrass are increasing (see WBEA Assessment discussion). New and expanded mining, new transmission lines, and oil and gas harms are far exceeding those agencies claimed would occur from these new or recently expanded developments. See 2012 Yubanet article on failures of Wyoming Core Model in the Powder River Basin.	All	Both	emc0411GB
465.	Many measures proposed are not mandatory - not even in Priority areas. General areas receive almost no protections. If the weak and uncertain conservation measures listed in the NTT are not greatly expanded (much more stringent controls placed on grazing disturbance, for all sagebrush habitats - and not just the segregated Priority areas) and made mandatory scarcely anything effective will be done to "conserve" the species across vast lands areas facing a plethora of energy, grazing-facilitated weed invasions, and threats.	All	Both	emc0411GB
466.	It is essential that all ongoing activities, all leases /ROWs already issued - all get reviewed, altered, changed, amended and/or terminated where conflicts are identified with habitats in the interim and immediately upon completion of this process. Existing leases, rights-of-way, etc. must be immediately amended to at least comply with the terms of IMs that must be greatly strengthened and that should not be based on segregating habitat. This can be readily done. Simply overlay the land records of leases, rights-of-way, grazing permits, etc. with mapped habitats, and inform the lease/permit holder of new protective provisions.	All	Both	emc0411GB
467.	In non-mountainous areas of more broad, rolling plains type settings (such as the Jarbidge or portions of the Snake River Plain) in many of the western areas - there has first been extensive "development" for livestock with crested wheatgrass seedings, and sagebrush eradication the 1960s and 1970s. These areas take an extraordinarily long time to recover. Chronic livestock use retards or prevents recovery of the composition, function and structure required by sage-grouse. For example,	All	Both	emc0411GB

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	depletion of forbs. See Jarbidge AMS.			
468.	BLM is to: - Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership. These features are: paved highways, gravel roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells and facilities, pipelines, landfills, homes and mines. This definition purposefully omits fences that kill sage-grouse, livestock water developments that promote West Nile virus and severe degradation of de-watered spring habitats, and degraded upland habitats. Spring developments dry up or greatly reduce flows and shrink meadow and other brood rearing areas. It omits disturbance such as imposing large herds of livestock - including in combination with damaging facilities and management practices. The degree and severity of understory degradation into areas where pipelines or roads are built - are habitat-degrading anthropogenic disturbances associated with livestock grazing. Livestock grazing disturbance is an imposed impact caused by man. Domestic livestock are not native to the sagebrush biome (Mack and Thompson 1982), and are imposed by humans with catastrophic historical degradation and loss, and chronic continuing harm- including landscape-level desertification, and loss of habitats and populations. Plus this ignores blocks of private cropland and activities that may already occur in these habitats. How are these going to be dealt with? Careful examination of the wording shows that lands could be completely torn to pieces, but BLM will be able to look at the direct bulldozed disturbance, and not the real ecological Footprint or impact of the disturbance. For example, there is a large difference between the many square mile visual Footprint of a wind turbine, and the bulldozed footprint where turbines are placed- the difference is square miles vs. small fractions of a mile.	All	BLM	emc0411GB
469.	NTT Grazing Items: Page 15 "Implementing Management Actions after Land Health and Habitat. Evaluations" largely perpetuates the status quo. There is only one thing in the small list of: Season of use or timing, numbers of livestock, distribution, intensity type of livestock that is different from often harmful status quo practices. We are encouraged to see that numbers of livestock (includes temporary non-use or livestock removal) is listed. How will this be determined? This is not carried forward in the IM. Does this mean that BLM will continue persecuting permit holders who seek extended non-use in the interim? So does this mean these considerations are going to be left up to the discretion of the Field Manager during the extended period between now and implementation of the EIS's actions?	All	BLM	emc0411GB
470.	We are alarmed at the expanded developments and several other aspects of the largely status quo grazing and FRH actions in IM 4-5. We are very concerned that pages 14-15 "Range Management" appears mired in "herbivory." Plus, as page 8 of IM 2012-043 shows, nothing at all related to grazing is applied to General Habitat. Is this too part of a habitat sacrifice scheme, enabling use to be intensified in general habitat?	All	Both	emc0411GB
471.	NTT at 18, and IM at 7 regarding Wild Horses: BLM must evaluate AMLs for horses at the same time as it addresses livestock grazing permits. These must be based on balancing needs of horses for food, cover and space including natural band structure, and analyzing adverse impacts of livestock grazing disturbance on all aspects of the thriving natural ecological balance. This must be done fairly.	All	Both	emc0411GB
472.	This contains a list of BMPs on"how to make a pond." However, there is no accounting for how tens of thousands of improperly built livestock and other ponds currently exist, inevitable leaks and spills in pipe or other water systems, or the role of livestock trampling of riparian or pond margins in creating mosquito habitat. There is also no accounting for water troughs - and pipelines extending waters and thus mosquitoes into areas remote from water. There is no analysis of any	All	Both	emc0411GB

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	kind of the adverse impacts of building ponds in plugging intermittent or ephemeral drainages - and the extensive livestock sacrifice zone that typically results. Prolonging water presence in ponds often prolongs and exacerbates intensive livestock degradation of large surrounding areas. Many thousands of ponds have been dug into portions of springs and wetlands in sage-grouse range as livestock "improvements." These improvements destroy the functionality of the spring, meadow, seep or drainage. They promote desiccation and desertification of the spring/meadow/riparian area, and loss of essential sage-grouse brood rearing habitat. There is no analysis of the impacts of livestock watering at ponds trampling and pocking shoreline depressions that serve as breeding spots for mosquitoes. Why isn't BLM requiring removal of ponds, and real restoration of functioning riparian systems and watersheds? Instead, just as with the greatly flawed Core and Priority schemes, BLM focuses on expanding habitat degradation and loss. Where is BLM guidance on How to Remove a Pond and Restore Watershed Processes? BLM must prohibit more ponds in sensitive areas altogether, and greatly reduce the existing number of energy, livestock, mining and other impoundments. BLM must also address the full Footprint and impacts of tens of thousands (if not more) of livestock troughs and associated water spillover areas in promoting West Nile virus acres uplands of the sagebrush biome.			
473.	How does directional and horizontal drilling affect aquifers and the spring and riparian areas whose surface expression is linked to them? How will water tables be impacted? Will waters essential for wildlife or human uses be polluted? How does punching pond after pond into areas with shallow water tables or aquifers, as described in the previous Appendix disrupt hydrological systems?	All	BLM	emc0411GB
474.	Why are there provisions to "have no tanks at well locations within priority areas" for fluid minerals, but no similar provisions for the battery of livestock wells, water tanks, and other elevated structures that exist across the sagebrush biome in occupied sage-grouse habitats? Is the battery of tens of thousands of elevated livestock range development structures all going to be "grandfathered in" and allowed to continue to be in left in place degrading sage-grouse habitats and public wild lands? These elevated structures promote opportunities for nesting and perching by ravens, or elevated raptor perches, or may impact grouse use of an area by providing taller visual intrusions.	All	Both	emc0411GB
475.	BLM merely lists washing vehicles to limit invasive species, a standard practice for decades now. BLM ignores integrated weed management actions like removing livestock disturbance that spreads weeds crosscountry affecting a landscape much beyond the bulldozed disturbance area weed infestation footprint of a typical energy project and its associated roading and other disturbances.	All	BLM	emc0411GB
476.	BLM is to "require sage-grouse safe fences." What is a "safe" fence? Why in the world isn't BLM requiring an immediate survey of all fencing, and identifying huge lengths of fence for removal? What is a safe fence? Don't grouse at times still collide with fences that have with reflectors? How does this balance with other uses - for example, fencing inside a Wilderness Area becoming even more visually intrusive? Greatly reducing fence density must be a primary goal, BMP, outcome. How much will the added reflectors and other visual distractions affect sage-grouse use of a landscape? With fences that remain, livestock zones of intensive disturbance, weed infestation sites, and predator travel corridors all will still be present.	All	BLM	emc0411GB
477.	This section also includes: "restrict the construction of tall facilities and fences to the minimum number and amount needed." How is the "minimum number needed" to be determined? Developers will always ask for whatever makes their development the most profitable - i.e. maximizes profits. Why isn't BLM requiring removal of livestock grazing to minimize weed spread,	All	BLM	emc0411GB

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	mesopredators, etc.ad to enhance rehab success and prevent added disturbance of native species in the footprint of development and surrounding lands? BLM must avoid placing development in undisturbed sagebrush lands and habitats in the first place must be the first consideration. Why isn't there a requirement that livestock and other fencing be removed - if new fencing is to be added? What about nearly invisible electric fence wires - used by the Forest and at times BLM? We have seen these imposed under Categorical Exclusions on a temporary basis as band-aids that also serve to intensify livestock use in all mesic areas that are not within the fence perimeter. These must prohibited. As an example, in Challis BLM sage-grouse lands in the Pahsimeroi, Decisions have been issued allowing locations of such fencing to be shifted all over the place as a transitory band-aid so that BLM can claim "improvement" or "progress" toward rangeland health standards in small temporarily fenced off areas. Such fencing intensifies impacts in unfenced areas.			
478.	Why is there no discussion about protecting flows of all springs, seeps and streams affected by energy and mining activity? For example, cyanide heap leach mining causes aquifer declines and aquifer drawdown of springs/streams. Water sources critical for wildlife may be severely altered by mining activity, and watershed by associated surface disturbance. These systems in arid western lands are typically already under significant stress from degradation by ubiquitously grazed livestock, and livestock water developments that remove water from spring sources to promote livestock use, as well as gouge stock ponds in springs or drainages. See Sada et al. BLM Technical Bulletin 2003. This alters and disrupt drainage networks, flow patterns, and extent of riparian and meadow habitats. There is serious risk of declines in water levels or cessation of flows altogether due to combined effects of mining, roading, grazing disturbances - all serving to desertify landscapes. Why are there no protections for such threats, especially given the breakneck speed of mining development in already fragmented areas of Nevada and other western states?	All	Both	emc0411GB
479.	Power washing vehicles does nothing to stop transport from roads accessing sites. When is BLM going to start "power washing" livestock - i.e. conducting integrated weed management to minimize transport and spread of weeds? Through quarantining animals for weed seeds to pass through guts, prohibiting turnout into lands without weed problems when livestock are coming from a weedy area, prohibiting knowing turnout onto weedy area until weed infestation is addressed, etc.?	All	BLM	emc0411GB
480.	BLM is not going to be able to prevent large wildfire. Fuelbreaks will not do that, and often promote weeds that fuel frequent fires. And if BLM attempts to engineer a massive series of fuelbreaks, it will only further fragment the sagebrush ecosystem and hasten its demise. So as an alternative, BLM must manage lands to be in the best possible condition using native species. That way, if an area burns, it is naturally more resilient and better able to recover. Livestock grazing must be removed if recovery is to be effective, and to occur without significant risk of cheatgrass and other weeds. Removal of grazing also hastens the speed of recovery. Thus, passive restoration -both before and after fires - is essential to resiliency, and reducing and minimizing the adverse effects of fire on wild land sagebrush habitats. In some instances, active restoration (re-seeding with local native ecotypes) may be necessary. But this must be followed by long-term removal of livestock grazing disturbance.	All	BLM	emc0411GB
481.	NTT Report "Diffuse Disturbance" Category Is An Effort by BLM to Again Avoid Examining or Controlling Livestock Disturbance The NTT report would allow 3% new disturbance in Core Areas. The NTT does not include "diffuse" disturbances. It is hard to understand how a fence is "diffuse" disturbance, or herds of several hundred cows imposed on	All	BLM	emc0411GB

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	nesting sage-grouse are "diffuse" disturbance. These are real damaging disturbances to and disruption of physical space. Under this reasoning, exploration for Oil and Gas, or Geothermal, would be a "diffuse" disturbance. After all, the heavy equipment moving crosscountry crushing vegetation is having an effect similar to a herd of grazing sheep or cattle. There is direct physical intrusion into space, as well as flushing, disturbing and displacing birds and damage to nests from both. The NTT describes livestock grazing and fire as "diffuse disturbances." This makes no sense at all. Fires burn a discrete area, and removes sagebrush cover required by sage-grouse. The effects are long-lasting. They are persistent. They alter, degrade and destroy habitats. This is not a diffuse disturbance, but a discrete, able to be mapped, long-term disturbance. Grazing involves discrete infrastructure and developments that alter habitats in specific, mappable locations. Grazing alters habitat components in specific, measurable ways. It imposes disturbance of livestock and management actions on discrete areas (pastures) for specific periods of time. Intensity of use can be mapped with use pattern mapping and other methods. Agencies apply various typically excessive use standards that are supposed to govern some measurable ways in which grazing alters habitats annually. Agencies measure ecological site inventories, rangeland health assessments, etc. to examine qualitative and at times quantitative ways in which grazing alters sagebrush systems and thus sage-grouse habitats. It cannot merely be considered a generally benign, diffuse disturbance as the Ims and NTT do. Management activities such as placement of salt or minerals, or any other activities that concentrate livestock, can cause long-term disruption and loss of sagebrush that can take hundreds of years to recover, even with a one-time substance placement. See Fite Jarbidge Declaration, with photos showing destruction of mature and old growth big sagebrush due to placement of mineral supplements on BLM lands, for example. This is typically followed by weed invasion. All of this is not diffuse disturbance. Over the course of just one grazing season, dozens if not hundreds of such damaged sites pepper the landscape. Mature and old growth sagebrush is killed, and soils are severely trampled and disturbed. Copious amounts of weed-promoting manure are deposited. The site is primed for weed invasion. Further, livestock trailing to concentrate on watering or other sites break sagebrush, destroy microbiotic crusts, and where slopes are present, trailing may cause incipient gullying that worsens over time.			
482.	BLM must fully consider removal/cessation of grazing disturbance over large areas to be passive restoration that serves as mitigation. BLM must amend all Land Use Plans to allow for grazing permit retirement to accomplish this.	All	Both	emc0411GB
483.	Disturbance Calculation. This focuses on non-grazing anthropogenic disturbances only (see J-3) - using the same categories as the BLM IM (transmission lines, distribution lines, wind development, and oil and gas/facilities, geothermal, communication towers, pipelines, paved roads, and others"). It is also to take into account "approved permits" – but it is unclear if this includes leases – often held by speculators and others. (See discussion elsewhere). Then, the HEA calculates "existing and allowable suitable habitat disturbance". Here, the HEA lapses back to the Idaho Sage Grouse Plan Model – i.e. pre-core modeling habitat categories that are: Key, potential restoration area type 1 (R1),Potential restoration Area Type - Perennial grasslands. R2), Potential restoration area Type 2 – annual grasslands, Potential restoration area Type 3 – conifer encroachment. The HEA model itself is a great disappointment. While the first page describes the need to consider cumulative and indirect effects and, and analysis of sage-grouse population within 18 km. – the model is a failure and does not do so.	All	Both	emc0411GB
484.	We are very concerned that the Scoping Information provided by the current BLM/federal Sage-grouse EIS Scoping, and its	All	Both	emc0411GB

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	extremely weak NTT and BLM IMs, are following very much the same failed, ineffective and time-wasting path as the Humboldt-Toiyabe Forest Rangeland EISs. The Forest Service "herbivory" narrow view of grazing impacts is largely mirrored by BLM's statements about "herbivory" in the 2012 sage grouse EIS process. In order to be effective in any way, agencies must base the EIS and its outcomes/actions on ecology, not the old, failed, broken paradigm of tinkering with managing "herbivory" and endless livestock facilities and "treatments" endlessly applied. We request that ecologists and biologists from outside federal agencies that are not associated with land grant colleges be fully involved in reviewing and addressing livestock impacts, and actions to remove and reduce these adverse impacts that synergistically are killing sagebrush ecosystems across the West.			
485.	All waivers should be ended immediately. The same goes for the loose uncertain "flexibility" BLM now routinely applies to grazing permits. Sudden changes in grazing schemes to accommodate the livestock industry must be prohibited	All	Both	emc0411GB
486.	BLM must immediately develop much more stringent livestock grazing controls and development controls in the Interim to protect all habitats.	All	Both	emc0411GB
487.	I am concerned that it will have a great impact on the ranching community we live in. With the high probability that it will stop all grazing on Public lands. With no grazing the probability of having wild fires is far greater. As an example, I was personally involved in a ranch that grazed the Dahlanega Creek area to Sheep Creek, Silver Leads, 4th of July Creek and on toward Salmon. After the ranch changed ownership, the range was closed. The grazing made better areas for wildlife. Today the area is over grown with weeds and the area is a lot harder to walk in. Public land grazing has been around since the mid to late 1800s and has not been a problem.	All	Both	emcc0131GB
488.	Furthermore, sage-grouse habitat must be protected from land uses such as energy development and livestock overgrazing that can degrade the natural landscape. Consistent management standards for these and other industries must be adopted throughout the bird's range based on the best available science, and according to recommendations made by the National Technical Team in their sage-grouse report.	All	Both	fla0000GB
489.	Giving ranchers the option to voluntarily relinquish their grazing permits back to the federal managing agency in exchange for compensation paid for by conservation groups would also provide a new tool with which to conserve and manage sage-grouse populations.	All	Both	fla0000GB
490.	As a person who has spent time in the prairie lands of the west, I have been appalled at the wholesale habitat destruction that has already occurred from land uses by absentee landlords for energy development and lifestock overgrazing. One is hard-pressed to find any semblance of what the western prairies once looked like. Time to stop this land MIS-MANAGEMENT before we lose more than just the poor Sage-Grouse	All	Both	fla0005GB
491.	As a person who has spent time in the prairie lands of the west, I have been appalled at the wholesale habitat destruction that has already occurred from land uses by absentee landlords for energy development and lifestock overgrazing! One is hard-pressed to find any semblance of what the western prairies once looked like. Time to stop this land MIS-MANAGEMENT before we lose more than just the poor Sage-Grouse	All	Both	fla0005GB
492.	private livestock grazing on PUBLIC LANDS is a huge driver of degradation of riparian and grassland habitat. American taxpayers effectively subsidize this destruction through the artificially low grazing fees charged of $1.35/month/cow-calf pair. This is the same rate as in 1936 and is a fiscal disaster and objective policy cheat	All	Both	fla0016gb

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493.	You must fully analyze all direct indirect and cumulative adverse impacts of livestock grazing, and act to remove livestock from remaining sagebrush landscapes	All	Both	fla0030gb
494.	Grazing promotes weeds that promote frequent fires - and degrades s	All	Both	fla0030gb
495.	The habitat for the sage-grouse must be protected from different kinds of land use, form energy development conducted irresponsibly, to overgrazing by domestic livestock	All	Both	fla0031gb
496.	The sagebrush regions of the Great Basin and Rocky Mountain corridor are part of our great heritage as Westerners and Americans, still -vast wide areas that have much to offer coming generations if managed properly. But the habitat has been drastically impacted by invasive species such as cheatgrass, frequently exploitative use by grazing and mineral interests, and shortfalls in regulation and enforcement.	All	Both	fla0086gb
497.	As it states below, I am a conservationist who would be very happy to be part of a payment plan to ranchers to relinquish their grazing permits. Many of us are ready to put our money where our mouths are to save habitats and birds like the Sage Grouse	All	Both	fla0087gb
498.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following conservation measures in the relevant Resource Management Plans and Land Management Plans-Develop and implement grazing systems and management practices that maintain the soil quality and ecological processes necessary for a properly functioning sagebrush community to address short-term and long-term needs of greater sage-grouse.	All	Both	flb0000gb
499.	Develop and implement grazing systems and management practices that maintain the soil quality and ecological processes necessary for a properly functioning sagebrush community to address short-term and long-term needs of greater sage-grouse.	All	Both	flb0000gb and rm
500.	I am particularly concerned that livestock grazing is getting a free pass. Everything from trampled wet meadows and riparian areas where the chicks feed for the first month of life to fences that create perches for birds of prey to water troughs where West Nile Virus lurks, to introduction of weeds and creation of conditions favorable for spread of exotics like cheat grass are contributing to the decline in sage grouse. Any serious effort to save the grouse must reduce or eliminate livestock grazing from major sage grouse population strongholds.	All	Both	flb0045gb
501.	The planning process must address all degrading land uses in sage-grouse habitat, such as energy development and livestock grazing, and management standards must be based on the best available science. Federal planners must ensure that all planning documents make the same prescriptions for land uses across sage-grouse range.	All	Both	flc0000gb
502.	Authorizing grazing permit retirement in the West would also provide managers new tools to conserve and restore critical sage-grouse habitat.	All	Both	flc0000gb
503.	The BL M has always claimed that wild horses destroy wild lands, but the here the BLM goes, letting livestock destroy Greater Sage Grouse lands of which horses have no impact. I see the extreme land erosion of cattle on recreational areas first hand, so your claim that you are concerned about wild lands rings hollow.	All	Both	flc0012gb
504.	Fences too are a problem, - they should be removed near leks of sage grouse]	All	Both	flc0023gb

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505.	It should be of no surprise to anyone after all these years of data collection that ridding the range of livestock will do more to aid these species and range than anything else that could be done. I hope that we get real and immediately start phasing out livestock grazing on public land.	All	Both	flc0042gb
506.	In order to effectively preserve the species and prevent ESA listing, it is imperative to remove livestock grazing from public lands that include sage grouse habitat. The damage done by livestock is pervasive, devastating and long-term - particularly in arid climates. Even renewable energy development is not as fundamentally damaging as is cattle grazing.	All	BLM	fld0006rm, fld0006gb
507.	I believe measuring stubble is very appropriate in determining when grazing should be reduced or eliminated.	All	Both	fld0007rm, fld0007gb
508.	Reduce livestock grazing in order to restore the grasses and other flowering plants that sage grouse need. Give priority to restoring riparian areas from overgrazing.	All	Both	flf0000gb flf0000rm
509.	I urge you to consider consolidated plan ammendments that will: reduce livestock grazing in priority habitat and potential recovery areas to restore native plants that the sage grouse depend upon;	All	Both	flg0000gb flg0000rm
510.	It is also necessary that the preferred alternative explicitly recognize the key importance of public lands ranching operations to the success of sage-grouse conservation. Scientific research has repeatedly shown that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife species. Well-managed grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species. Moreover, public lands ranchers own a significant portion of high-quality lowland brood rearing habitat as deeded property. According to NRCS, [a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands. However, if regulatory measures on public lands make ranching operations economically unsustainable, these operations are frequently subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse conservation measures do not undermine the viability of public lands ranches.	All	Both	fli0000gb
511.	Any EIS or SEIS developed must also recognize and incorporate the extensive research that has already been conducted by the USDA Natural Resources Conservation Service (NRCS) on the complimentary relationship between sage-grouse conservation and grazing. According to NRCS, the same factors that negatively affect sage-grouse also negatively affect the health, productivity, and sustainability of native grazing lands. Therefore, improvements to benefit sage-grouse also benefit grazing lands and the ranchers that depend on them.	All	Both	fli0000gb
512.	Any EIS or SEIS must also explicitly recognize the following points: • Properly managed grazing can enhance sage-grouse habitat and should be incorporated into the sage-grouse management strategy. • Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations.	All	Both	FLI0000GB
513.	In the Great Basin, and much of the western United States, livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire rural communities that largely depend on ranching to maintain businesses and tax base.	All	Both	fli0000gb
514.	Scientific research indicates that grazing is beneficial to the greater sage-grouse and to a host of other wildlife. Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids	All	Both	flj0000GB

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	in the control of invasive plant species			
515.	NEPA analysis should start from the premise that grazing can be a benefit to sage-grouse and properly managed grazing should be incorporated into the sage-grouse management strategy.	All	Both	flj0000GB
516.	Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations.	All	Both	flj0000GB
517.	Threats to sage-grouse should be avoided in all situations, especially livestock grazing and related influences thereof. This includes elimination of over grazing, fences, water developments and diversions, predator management, and leasing land to livestock interests where there is no profit being made by the federal government.	All	Both	flk0002gb
518.	Furthermore, grazing, if managed correctly, can benefit sage-grouse habitat. The NESRSGWG requests that the Draft EIS analyze the beneficial impacts from livestock grazing on sage-grouse habitat.	All	Both	fxc0003RM
519.	The NESRSGWG also requests that the BLM analyze the impacts of making specific project environmental analysis (EA's) so burdensome and complex that there is no longer any incentive for ranchers to complete range improvement projects. Some range improvement projects may have an indirect positive impact on sage-grouse habitat through improved grazing management.	All	Both	fxc0003RM
520.	As recognized by the BLM in IM No. ?012-043. grazing can be "used as a tool to protect irrtact sagebrush habitar and increase habitat exteilf and continuity which is beneficial to the Greater Sage-Grouse and its hahitat." The IM continues. "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage- Grouse habitat on public lands." According to Natural Resources Conservation Service (NRCS) gr:azing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs. and thus livestock can be used [o manipulate the plant community toward a desired condition."	All	Both	fxc0006GB
521.	Sound scientific research indicates that grazirrg is beneficial to the Ereater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires" (Launchbaugh et al. 2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et al.1994, Evans 1996). [t has also been used to control invasive weeds (Olson and Lacey 1994, Walker et at.1994).	All	Both	fxc0006GB
522.	The EIS and SEIS revi,sioils should clarify that multiple-une management concepts should be used to reduce the risk of catastrophic wildfire, improve forage. refilove invasive species and provide open space. We strongly encourage the agencie.r to prioritize theit focus on public land use, or disuse, which poses a real threat to the greater sage-grouse and its habitat	All	Both	fxc0006GB
523.	In regard to livestock grazing management, an adequate regulatory meehanisnl already exists to provide for the protection and peTpetuation of sage b'1'ouse and sagebrush habitat. It is called the Standards for Rangeland Health and Guidelines for Livestock Grazing Management and was incorporated into federal grazing rebrulations in 1995. The true issue here is whether the USFWS believes tIns authority is being properly applied on BLM lands. If the answer is yes, there is no need to proceed further with this EIS effort as it relates to grazing. If the answer is no, the lmderlying reason for BLM failure to manage the public land in accordance with law needs to be dcterrn.ined and evalLlated. As stated within your NOr, the Fundamentals ofRangc1and Health, 43 CFR 4180, are planning criteria for all altematives. As such, public land grazing is a non-issue in tins planning process, since "regulatory mechanisms" are alr.eady in place for sage grouse/grazing via Standard 8	All	Both	fxc0011gb

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	of the FIlil. See 43 C.F.R. 4180.2(c) (wherein the "autllorized officer (of BLM) shall take appropriate ac.iion as soon as practicable but not later than the strut of the next grazing year upon determining that existing grazing management practices or levels of brrazing use on public lands m:e significant factors in failing to achieve the standards (for Rangeland Health, which is inclusive of Standard 8 relating to ~1)ecies, like the sage bTfOUse)). (2) Notwjlh~1anding (1) above, we fully understand and have concerns .j~)(the potential consequences ofUSFWS determining the need for "regulatory mechanisms" to avoid ESA listing of sage grouse and BUvllUSFS eFforts to attain these mechanisms tlu'ough a Land Use Plan amendment process. The comments below are intended to address those concerns.			
524.	11) The EIS must evaluate the impact proposed sage grouse conservation measures will have on other land uses. Unintended consequences of management prescriptions/restrictions are a major problem when imposed by broad scale plmming decisions that focus on relatively minor components of the ecosystem. The most obvious example of this unintended consequence problem is restricted livestock grazing that increases residual fine fuels and ultimately results in incrca<;ed fire fi ·equency. See Attachment B, which also details unintended consequences 111at oftentimes result from. Misl:,ruided and mi!lapplied grazing restrictions.	All	BLM	fxc0011gb
525.	Habitat fragmentation is an issue that needs much more research and understanding prior to imposing additional resuictions on land uses and development. Major questions remain as to the significance of the physical presence of infrastructure withiu sage grouse habitat as opposed to its frequency of use or potential for subsequent consequences. Does a two U11Ck road that is only used 1-2 times per year truly result in habitat fragmentation as far as the sage grOUSf: is concerned? Additional knowledge also needs to be obtained to answer the questions listed below: Knowledge Gaps in Livestock Infrastructure Issues Related to Sage Grouse Habitat Although there is a large body of popular "wisdom" about the effects of livestock fences and water developments on sage grouse, there has been little research on these issues. • Collisions with fences are known to kill sage grouse and related species (Wolfe et al. 2007) Knick et al. 2011, Stevens et al. 2011), although the effects on these populations is unknown. We need information on how fence mortalities affect sage grouse population stl1lcturc, including effects on age c1a(]s and sex of the birds.Rowl<lud al1d Wisdom (2002) pointed out that there is no empirical research on raptOl's and corvids llsing power lines and l~nces as perches to improve their success in preying on sage grouse. We know of no recent research or information on this.	All	Both	fxc0011gb
526.	17) It has heen suggested that thc impacts of livestock grazing are spread lmevenly across the landscape and may posilively or negatively affeet sage grouse habitat. Additional conservation measures should not be applied to lhose locales where existing Or Cllrrent management strategies are resulting in improving sagebrush habitat conditions and increasing sage grOIL"ie population numbers. For example. when the BLM has made a determination that the CUlTent grazing use conforms to Standard 8 of the Rangeland Heath Standm:ds, then there is no legal or faclual justitkation for the BLMIUSFSW or for a Land Usc Plan to prescribe something more or different. See (1) above. The unintended consequences of new management restrictions men(ioned in (11) also apply here.	All	BLM	fxc0011gb
527.	21) There is only little evidence of direct negative effect of livestock grazing on sage grouse and fuere is no evidence that livestock grazing is the primmy cause of sage grouse population decline.	All	BLM	fxc0011gb
528.	22) Nest trampling by livestock appears to be exaggerated. Trampling of sage bTfouse nests by livestock and nest desertion due to disturbance by livestock have been reported, although relatively rarely. Only two out of 161 nests in a Utah study	All	BLM	fxc0011gb

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	were trampled by livestock (one by cattle and one by sheep) and five were deselted following disturbance (Rasmussen and Griner 1938, as cited by Rowland 2004). Disturbculce by livestock is most likely when cattle and sheep are herded together and moved (Call and Master 1985), willi sheep being more likely to disturb sage grouse than are cattle (Patterson 1952, as citcd by Call aJ1d Maser 1985).			
529.	26) The following statements relate directly to livestock grazing and its effect on sage grouse anellor sage brush ha.bitat. The point!'; must be considered and fully assessed when developing livestock mmlagement strategies intended to benefit sage grouse. • DOlmant season grazing ruld appropriate Sl.Lrnmer grazing by cattle can improve habitat for sage grouse. • There is little indication that fall grazing affects grass growth during the following nesting seaC)on, although fall grazing does afCeet the residual grass available for nesting cover (though it is a que~ .. tion ofrelanve degree). • Appropriate cattle grazing in mesic meadows during summer can increase the availability offorbs for sage grouse. Sage grouse depend on lush forbs for bro~)d rearing during summer (Peterson 1970, Drut 1994b, Iluwcr 2004). Cattle gr.~zing in mesic meadows can increase this food supply (Evans 1986, Necl 1980 as cited by Holechcck et al. 1982, Evan~ 1986, and Wambolt et al. 2002). Sage grouse were attracted to nOlthern Nevada meadows that had been grazed belore forbs went dormant in late July and used these significantly more than adjacent lUlgrazed meadows (Evans 1986). The regrowth was higher in protein c:md lower in fiber than mature tissues. • A second study in the same ar.ea fOlUld that a rest-rotati.on g.razing system was especially beneficial for sage grouse (Nee1 1980 as cited by Holecheck et aL 1982, Evans 1986, and Wambolt et al. 2002). Rest periods allowed forbs to thrive and subsequent grazing reduced grass cover and made the forbs rnore available to sage grouse (Neel 1980 as cited by Evans 1986). A third study in tlns area fOlmd that sage grouse prefened to forage in areas where vegetation ranged fTom 8 to 15 em, rather than adjacent areas where vegetation ranged from 10 to 25 em (Klebenow 1985 as cited by Wamboldt et al. 2002) • No signiflecmt relationship wa~ found between sage grouse extirpation from its hlSt0l1C range and cattle density in those areas (Aldridge et al. 2(08). • Claims of direct negative effects of livestock b'l'azing on sage grouse are poorly supported by the scientific literature. BLM must insure that studies cited as jU'ltification for management changes intended to benetit sage grouse are applicable to sage b'l'ouse. In numerous cases, management recommendations for sage grouse have been based on~tudies conducted on other birds. For example, in his "A Blueprint for Sage-grouse Conservation and Recovery", Braun (2006). stated that "Grazing by domestic cattle can negatively impact nesting success of ground-nesting birds," and cited Walsberg (2005) as support. However, the cited study did not study sage grouse and is not directly applicable to sage grouse. R...'lther, Wal:-;berg (2005) discussed ollly dark-eyed jlU1COS (Junco hyemalis) in ponderosa pine communities ofnolthern i\rizona. LOwer success of dark-eyed juncos in grazed areas was attributed to more extreme nest micro-climates resulting from the removal of herbaceous vegetation by cattle. However, grazing did not begin until after all clutches had hatched (Walsberg 2005). In addition, dark-eyed junco chicks remain in the ncst for up to 13 days after hatching (Walsberg 2005), in contrast to sage grotL')e chicks, which leave the nest soon after hatching (Schroder, 1999). This means that sage grouse chicks are little affected by nest micro-climate, the putative cause of reduced dark-cyedjunco chick success. Walsberg (2005) also suggested that vegeta.tion removed by cattle may have int:reased predation by making nests more visible, although predation rates were not recorded in thJl:i ~iudy.	All	BLM	fxc0011gb
530.	Regulations to greater limit livestock grazing are not solutions to stop the decline of sage grouse. Historically sage grouse have been found thriving where cattle have grazed or are grazing.	All	Both	fxc0012GB

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531.	Our public lands are used and enjoyed by many different people. We all need to be responsible citizens to protect these lands and habitats. We as a ranching family love the land our existence is dependent on public lands grazing. We have and will continue to be stewards of our public lands.	All	Both	fxc0012GB
532.	We stress flexibility in a plan that will show compatibility with grazing, mining, and recreation.	All	Both	fxc0012GB
533.	I control several hundred thousand acres of federal and for grazing purposes and the majority of it is considered critical and essential habitat. Sage Grouse are plentiful on most of my range. The highest nwnber of birds however is on my deeded ground. Maybe ranchers like my self are better lands managers than the government and capable preserving habitat while at the same time harvesting more forage from the deeded than is allowed by the BLM.	All	Both	fxc0017GB
534.	My ranches produce about 800,000 pounds of beef every year. That is enough to feed every person in the State of Nevada for several days. To put an actual food producing operation in jepordy because of an unfounded environmentalist driven act would be unconscionable. Support any action on your part.	All	Both	fxc0017GB
535.	Within 10 years of establishing the rotation method I would say our available forage doubled. Now, after 20 years of practice we leave considerable standing forage and the cattle benefit from continually moving onto fresh pasture.	All	Both	rmc0003RM
536.	How does this benefit Sage Grouse? Small chicks need a succulent understory that contains lots of juicy bugs for survival. When first hatched they probably can't even reach Sage Brush leaves. With cattle on each area for only about two weeks out of the entire year it leaves the rest to the birds and other wildlife. As the cattle are moved any rain that falls during the summer benefits regrowth as cattle are not there to eat off the young shoots. The clue to rotation grazing is to not return to the same pasture until the grass has recovered. In our arid climate we do not return to regraze an area in the same year thus leaving a great deal of cover. We also rotate the cattle through the pastures in a different sequence each year. This allows plants to flower and seed undisturbed every few years no matter what time of the summer they bloom.	All	Both	rmc0003RM
537.	I feel the biggest detriment to habitat for cattle and wild life is club moss. Many people look out over their pastures and see sagebrush as a threat to their pastures. We did too until we started looking under the sagebrush. The real culprit is club moss. This cannot be removed by reducing cattle numbers. On one range field trip we examined and exclosure that had not one head of cattle on it for the last 40 years. It had as much club moss inside the fence as outside of it. A range expert told me once that he had placed a clump of club moss in a box up on a shelf in his office. Six months later he took it down and poured water on it. The club moss turned green and started to grow. There are a few ways to kill club moss. Chemicals do not work very well and are expensive. The best luck we have had on our own land is: (1) winter feeding on it. You will find no club moss on your winter feed grounds. Even rolling one round bale off a hillside will show benefits years later. The heavy concentration of cattle urine kills the moss. Rotating winter feed grounds with summer or fall pasture really improves them. (2) Spiking and drag harrowing the pasture. Gouging up the moss and throwing dirt over it will kill the moss. Just once over with spikes leaves enough sagebrush intact for the grouse. The more club moss that can be killed the more understory will grow among the sagebrush benefiting the sage grouse. Once killed, rotation grazing will keep the club moss from returning. (3) Concentrating a large enough number of cattle in a small enough area will trample the moss. This is difficult to do over a large area. We put salt and mineral out in areas of the worst club moss infestation. No matter where you put out the salt or how far it is from water the cattle will find it.	All	Both	rmc0003RM

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538.	In conclusion I do not believe simply reducing the number of cattle in a pasture will benefit sage grouse very much if at all. Managing the cattle in a rotation method of grazing would be much more beneficial to both sage grouse and cattle. If you have a good habitat for one, it is good for the other. Any money the BLM may have available would be best spent in spiking and cross fencing to benefit sage grouse.	All	Both	rmc0003RM
539.	Prescriptive grazing shall be considered and a tool for use in increasing and establishment of habitat for Sage Grouse.	All	Both	rmc0004GB
540.	Range Improvements to benefit species and maintained by permittees who hold Federal Range Maintenance agreements will be allowed mitigation credits.	All	Both	rmc0004GB
541.	As well as the impact of grazing should be controlled in grouse habitat	All	Both	rmc0008RM
542.	In addition to its economic significance, livestock grazing provides irreplaceable environmental and social values. These values contribute irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the EISs/SEISs.	All	Both	rmc0010RM
543.	Livestock grazing is an important tool used to enhance and sustain rangeland health. In Chapter Two of the EISs/SEISs, which includes goals, objectives, and management actions of the various resource values, it is essential these goals, objectives and management actions for livestock grazing management include the promotion of livestock grazing management. This is a stark contrast to the belief that livestock grazing management exists only to promote all other resource values. Chapter Two should be written with the understanding that livestock grazing is an important resource value in and of itself. Often, the effects livestock grazing has upon other uses are focused on and the impacts of those uses upon livestock grazing management, forage availability and grazing permittees are overlooked. Planning needs to include the effects greater sage-grouse management has upon livestock grazing management.	All	Both	rmc0010RM
544.	So will designation of a system of sagebrush reserves as Areas of Critical Environmental Concern (to protect the highest quality remaining habitat from degrading land uses) and retirement of grazing permits in the West.	All	Both	rmc0020GB; rmc0004RM
545.	Sage Grouse benefit from livestock grazing. Thus, the EIS and SEIS scoping process must analyze the positive impact livestock grazing on public lands has on sage grouse populations; and must analyze the loss of those benefits should grazing on public lands be reduced or eliminated.	All	Both	rmc0021GB
546.	- It is well established science that proper grazing practices serve to benefit public lands, as well as the wildlife populations that habitat such areas; - It is also well-established that sage grouse populations benefit by grazing on public lands and that grazing is compatible with good sage grouse habitat; - Grazing reduces the frequency and severity of fires, one of the biggest threats to Sage Grouse habitat. See, Karen Launchbaugh, et. al, Interactions Among Livestock Grazing Vegetation Type, and Fire Behavior in the Murphy Wildland Fire Complex in Idaho and Nevada, 30 (USGS July 2007); - Additionally, livestock increase the quality and availability of forage for Sage Grouse. See. id.; see arso Matthew J. Holloran and Stanley H. Anderson, Greater Sage Grouse Research in Wyoming: An Overview of Studies Conducted by the Wyoming	All	Both	rmc0021GB

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	cooperative Fish and Wildlife Research Unit between 1994 and 2005, C-28 (2005); - For example, strategic supplementation coupled with intensive grazing by livestock at high stock densities for short periods may be an economical and sustainable way to rejuvenate sagebrush steppe (Provenza et al. 2003). - Finally, keeping livestock on the landscape prevents range land and Sage Grouse habitat from being converted either into crop land or, more important, into human development, such as subdivisions; - Livestock grazing, particularly when such grazing occurs on parcels of adjoining deeded and public lands, helps to minimize the negative impacts to sage grouse populations of land fragmentation and human development. Sage grouse populations in Montana are healthy precisely because of decades of good rangeland management by agriculture producers in this State; - For these reasons, responsible livestock management and grazing is a helpful tool in Sage Grouse habitat management and should be used accordingly; - MWGA's membership recommends that BLM analyzed, address, and recognize the benefit grazing has to healthy sage grouse populations as part of the EIS/SESIS process.			
547.	Ranching is a crucial component of Sage Grouse success. Thus, BLM should recognize, as a result of the scoping process, that the EIS and SEIS alternatives should analyze the benefits of continued responsible rancbing practices to the sage grouse and its habitat.	All	BLM	rmc0021GB
548.	In sum, it is an undeniable fact that the most important remaining habitat for sage grouse in Montana resides in the hands of agriculture producers. BLM must analyze what part its public land management policies have played in the decline of sheep ranching over the last 40 years. Because sage grouse must consume soft-tissue foods, sage grouse used to thrive on sheep droppings. But, this source of sage grouse food has dropped as the number of sheep ranchers have dropped. MWGA recommends strongly that BLM take these realities into account when shaping its sage grouse management policies.	All	BLM	rmc0021GB
549.	Prescriptive grazing should be considered as the priority tool for use in increasing and establishing the habitat for sage-grouse. We feel it is the most cost-effective approach and stats have shown that when the sage-grouse populations were the highest. the Utah BLM permitted livestock AUM's were 1.7 million. The sage-grouse population decline closely resembles the decline of permitted livestock AUM's to the current .7 million AUM's . The numbers are very similar for Forest Service AUM's. We would like to add the coordination of the Grazing Improvement Program in Utah to improve long-term grazing management.	All	Both	rmc0023GB
550.	We encourage the BLM and USFS to look at multiple grazing species to achieve desired vegetation conditions for sage-grouse such as winter grazing with sheep to enhance sagebrush. We feel the BLM and USFS should consider other alternatives such as restrotation systems. The no-grazing alternative would be devastating to the local customs/culture/economics of Box Elder County.	All	Both	rmc0023GB
551.	We strongly encourage habitat projects where needed. Vegetation treatments without improvement management will be very short-lived. Local sage-grouse working groups should have a major voice as to where and how money is spent with the advice of the University Extension and local biologists.	All	Both	rmc0023GB
552.	Range improvements to benefit species and maintained by permitees who hold Federal Range Maintenance agreements should be allowed mitigation credits. We strongly support oll-site mitigation for projects that impact sage-grouse habitat.	All	Both	rmc0023GB

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553.	Protection and restoration of sage-grouse is a major objective for public lands. To achieve this objective, it is necessary to manage grazing so that the habitat characteristics needed for breeding and wintering can be consistently maintained.	All	Both	rmc0024GB
554.	Livestock grazing is compatible with sage-grouse where the habitat characteristics needed for breeding and wintering can be consistently maintained. It is paramount that only light grazing be permitted on important sage grouse wintering areas, because during winter, sage grouse often use tall, dense stands of sagebrush which remain relatively exposed through deep snow. Light grazing produces mosaics in vegetation and an increase in herbage production that are favorable for Sage-Grouse nesting and brood-rearing habitat. Riparian areas and wet meadows used for brood rearing are especially sensitive to grazing by livestock. Protecting sage grouse nesting and brood-rearing habitat from livestock use also encourages climax vegetative conditions. If this is not feasible, limit grazing to the month of July. Defer grazing until after the peak of the growing season with the intent of providing herbaceous cover and forage for the majority of the nesting, hatching, and early brood-rearing. Cessation of grazing by 1 August is designed to minimize livestock concentrations in wet meadows and riparian areas with open water by avoiding "hot season" use and to allow a 30-day regrowth period before the first killing frost. Additionally, late summer-early fall regrowth is important for carbohydrate storage in roots and stem bases of cool season grasses. This enhances plant vigor while allowing residual vegetation to accumulate cover for nesting and early brood-rearing the following spring.	All	Both	rmc0024GB
555.	Data shows that successful grazing systems were found to have significantly (p=0.01) less grazing during the "hot season" (July through early September) (12.5 d) than unsuccessful systems with 33 .4d. Likewise, the duration of all livestock treatments was significantly (p=0.001) shorter in successful systems (28.2d) compared to 59.3 d in unsuccessful systems. Given the reluctance of cattle to disperse from riparian areas, the duration of grazing treatments becomes a key factor in determining the severity of impacts such as trampling and mechanical damage, soil compaction, and utilization. A combination of longer duration and more frequent fall grazing deteriorated woody species vigor and regeneration, contributing to diminished floodplain function and reduded riparian dependent values.	All	Both	rmc0024GB
556.	It has also been shown that increased use of meadows and riparian areas in mid-to late summer is common as herbaceous vegetation in upland habitat becomes desiccated. Potential for competition with Sage-Grouse young may be in proportion to the extent to which cattle select mesic/moist sites that are preferred foraging areas. Young birds seek out insects and succulent forbs in these habitats. Although the adult diet switches to forbs and insects in addition to sagebrush, developing young depend heavily upon insects for food. These habitats are critical brood-rearing and summer use areas in regions with low annual rainfall and during drought years.	All	Both	rmc0024GB
557.	Protect sage grouse spring, summer and fall ranges during periods of drought. Drought alone has been identi ied as a major factor contributing to the range-wide decline of sage grouse (Connelly and Braun 1997). Design adaptive management strategies to protect against the cumulative effects of grazing use on sage grouse forage and cover during drought. Livestock grazing of sagebrush ranges during years of unusually low precipitation and poor plant growth will cause an earlier than normal removal of grasses and forbs. This can have a serious impact on grouse dependent on forbs in that locality. Results suggest the timing and amount of moisture received were important to nest success...cool season grass growth during the preceding year (i.e., available as residual grass to nesting females) appeared to be important for overall greater sage grouse	All	Both	rmc0024GB

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	nesting success. The drought indicators from the National Climatic Data Center can give long term percent of normal precipitation forecasts that give forward looking projections of one, three, six and twelve months. Such information is critical to manage for sage grouse. The effects of low precipitation and drought are difficult for all wildlife and if grazing livestock are allowed in sage grouse habitat, the negative effects to sage grouse are well known. stocking at near-normal levels during periods of moderate to severe drought is probably the greatest cause of rangeland deterioration. Reduced stocking rates during drought, and for some time after drought, are necessary to minimize damage and hasten recovery of perennial vegetation.			
558.	Also, during times of drought, cattle are attracted to moist areas. Failure to adequately manage for these periods may result in greater impact in the form of reduced vegetative cover. Brood-rearing habitats for sage-grouse are typically mosaics of upland sagebrush and other habitats (e.g., wet meadows, riparian areas) that together provide abundant insects and forbs for hens and chicks. Although the adult diet switches to forbs and insects in addition to sagebrush, developing young depend heavily upon insects for food.	All	Both	rmc0024GB
559.	Avoid livestock water developments and salt grounds in traditional sage grouse spring, summer, and fall habitats. These developments significantly concentrate livestock and increase forage use, trailing, and soil compaction that fragment sagebrush habitat. These heavy-use areas may extend up to 0.8 km away from the site providing a niche for noxious weeds and other undesirable or unpalatable vegetation to take hold.	All	Both	rmc0024GB
560.	It is advisable to avoid and eliminate man-made water sources that support breeding mosquitoes known to vector the West Nile Virus. This infectious disease is known to exist in the sage grouse ranges in Montana.	All	Both	rmc0024GB
561.	Have quantifiable data collected that show there is enough herbaceous cover (at least 18cm under and around sagebrush. This cover is to be a condition of grazing on public land.	All	Both	rmc0024GB
562.	Limit grazing to the month of July.	All	Both	rmc0024GB
563.	Limit grazing in riparian areas. During low precipitation years, livestock should not be in riparian areas.	All	Both	rmc0024GB
564.	Limit and avoid man-made water sources.	All	Both	rmc0024GB
565.	Have a drought management plan, with quantifiable objectives, in place before cattle are turned in to graze.	All	Both	rmc0024GB
566.	Have regulatory and enforceable actions in place when grazing changes need to be made. These actions must be based on quantifiable evidence. The possible changes need to be well understood by livestock producers before the permit turnout dates and, when data indicates, need to take effect immediately.	All	Both	rmc0024GB
567.	Many like to point fingers at the livestock industry for the demise of sage-grouse, while more obvious culprits are to blame. Wildfire, development, fragmentation and predation are less emphasized because livestock grazing is more easily modified, even though it is clear that those other threats are substantial and, in many cases, livestock grazing has been proven beneficial to sage-grouse and sage-grouse habitat.	All	Both	rmc0025GB
568.	Ranching is an important component of many of our western, rural economies and the ability to graze livestock on BLM/USFS lands is critical to these communities. Livestock numbers and season of use should not be changed to the point	All	Both	rmc0025GB

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	that it is no longer economically feasible to graze. Functioning structures, such as corals and livestock bedding sites, should be "grandfathered" in. Often, sage-grouse prefer these disturbed areas for lekking, and the permittee should be restricted for created such habitat.			
569.	Targeted grazing should be allowed and encouraged as a tool for creating fire breaks, controlling weeds, and improving habitat. In some cases, fencing can help facilitate the success of a Targeted Grazing project. Electric and net wire fencing should not fall under the same specifications as other high-impact problem fencing.	All	Both	rmc0025GB
570.	Grazing is very compatible with sage grouse habitat and reducing livestock numbers is not the solution for improving sage-grouse population and it should not be used as a mitigation strategy.	All	Both	rmc0025GB
571.	Over the past 30 years the west has encountered wildland fires that have destroyed millions of acres of public and private lands. The wildland fires have destroyed not only sage-grouse habitat but other wildlife and wildlife habitat. Elko County believes that the changes in public land grazing policies that have been implemented in recent years has directly contributed to the catastrophic fires and degradation of much of the public lands in the west. These fires have directly contributed to the loss of wildlife and wildlife habitat including the Greater Sage-Grouse habitat. In 2006 in northern Nevada alone over 11 million acres of public and private lands along with wildlife habitat was lost to wildland fire. These catastrophic fires were not prevalent nor as severe in the west during the period of time that cattle and sheep livestock grazing was at its peak. The consistent removal, restriction or limiting of livestock grazing has promoted decadent dry fuels that are easily ignited and become enormous wildland fires destroying all in its way.	All	Both	rmc0026GB
572.	The decrease of livestock grazing public lands has directly contributed to the degradation of sagebrush and other habitat due to the loss of consistent grazing activities that help initiate fresh habitat growth. The theory that the European settlers somehow caused loss of habitat and changes to the Sage-Grouse habitat and populations is not a plausible concept. Elko County has taken countless public testimony and researched many historical documents and journals of settlers, pioneers and explorers that expressed and documented that Sage-Grouse or any type of wildlife was not as abundant in our region before western settlement as many would believe. It has been documented by many lifelong ranchers, hunters and recreationist that that the Sage-Grouse and wildlife populations did not increase until settlers and ranchers established ranching and farming operations and livestock grazing was introduced to the west.	All	Both	rmc0026GB
573.	We believe the management of federal lands must provide for both sage-grouse and livestock grazing as well as be made compatible with people and other resource uses. The large acreage ranching/farming operations are essential to protect sage grouse habitat from land use changes, such as housing developments. That means grazing permits must continue to be issued that enhance the economic viability of these livestock operations. This county and our neighboring county have seen small, often marginal ranch operations converted to second homes and other uses that destroyed critical habitat or enhanced predator opportunities resulting in substantial reductions in all wildlife numbers. It is extremely important that this interspersed ranchland holding foster grazing use and retention of ownerships that supports sage-grouse and the ecosystem they use. Our county has a limited private land tax base. The retention of economically viable operations such as ranching and forestry operation are far less costly to the county than the infrastructure and the safety and support facilities that come from second home and other such developments. In order to provide information and interact with the agencies as this program goes forward we would like to be granted coordinating government to government status.	All	Both	rmc0032gb

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574.	The beneficial effects of grazing on sage-grouse and its flora and fauna must be made clear. Deal especially with fire effects, plus forbs community enhancement.	All	Both	rmc0032gb
575.	Reducing livestock numbers should be the least used mitigation measure because it has been a major influence in retaining large tracts of the essential sagebrush ecosystem while maintaining grasses and forbs. Focus measures on real threats to sage-grouse and its habitat.	All	Both	rmc0032gb
576.	Functional structures, corrals, etc. that are old should be exempt from management.	All	Both	rmc0032GB
577.	Fences vary substantially as far as influencing sage-grouse and should have effects evaluated individually.	All	Both	rmc0032Gb
578.	We have many concerns related to the restrictions already being discussed for livestock grazing within the NEPA planning process. A BLM instruction memorandum (1M) sent to all field offices states, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." The National Greater Sage-Grouse Planning Strategy lists grazing as fifth on the list of identified threats to the greater sage-grouse. What potential financial constraints have been identified for the other primary threats? Why is enhanced management of livestock grazing the solution for other threats?	All	Both	rmc0034rm
579.	Livestock grazing was introduced to the western states in the 1860's. Region wide declines in sage-grouse populations were not documented until after the middle of the 20th century. Were sage-grouse and grazing compatible for the first 100 years of coexistence but not in the last 50 years? What changed? We do not believe one industry should bear the economic burden of improving sage-grouse habitat when there are multiple threats identified for the species.	All	Both	rmc0034rm
580.	The following are excerpts from Policy Analysis Center for Western Public Lands Policy Paper SG-02-02 Conservation of Greater Sage-Grouse on Public Lands in the Western U.S.: Implications of Recovery and Management Policies 4.1. What About Livestock Grazing? para 1. Livestock grazing is possibly the most contentious. polarizing. politically charged and complex issue facing those who make and implement public land policy. Para 2. The key policy issue before us is this: to restore grouse populations, saaebrush svstems will have to be manaaed for the benefit of the bird. How this affects livestock grazing is a complex question. Overall, most of the research on sage-grouse habitat needs took place, and continues to take place, on habitats that are grazed. We can see from the range of data that grouse and grazing coexist in many, if not most, areas so we know with reasonable certainty that grouse and livestock are not mutually exclusive. Para 3. There are few scientific, peer-reviewed articles that address the grazing and sage-grouse issue - none that are designed experiments, and none with replicates. Most of what is available reflects conclusions or thouahts without emoirical fi.ala, or it represents gray literature. Our general opinion is that any argument that livestock grazing presently is the primary cause of sage-grouse population decline cannot be supported by available research. Para 4. Relatively healthy populations of sage-grouse occur where domestic livestock graze sage-grouse habitats, and grazing management in these areas results in habitat characteristics that support sage-grouse populations. --------. Changes in grazing management may be necessary to increase these sage-grouse populations, but experimental data are lacking to guide these management decisions. The empirical data we have on sage-grouse habitat includes some uncertainties. Para 5. In the final analysis, grazing considerations will always be important to maintain habitat quality, but, do not appear as important in the next three to five years for the recovery of	All	Both	rmc0034rm

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	sage-grouse as are fire, habitat loss, invasive species and the other alternatives that we discuss in other sections. (emphasis added) In para 2. above: The one statement in this paper that we adamantly disagree with is; "sagebrush systems will have to be managed for the benefit of the bird." This statement is in complete violation of NEPA and the protection of the Human Environment. NEPA directs that the Human Environment will be protected. Otherwise for the most part the paper is correct in its statements. Paragraph 3 above is absolutely correct. There is not scientific data to support that livestock grazing is harmful to sage-grouse.			
581.	To the greatest extent possible, a non-regulatory approach shall be used to influence management alternatives within Core Population Areas. Management alternatives should reflect unique localized conditions, including soils, vegetation, development type, predation, climate and other local realities."§ The Governor's EO specifies a non-regulatory approach for management of the sage-grouse and habitat within the State of Wyoming, WYO BLM indicates that it agrees with the Governor's EO and will abide with this strategy. Why are the BLM and the Forest Service so intent on going far beyond the Governor's desires when it comes to livestock grazing in the State of Wyoming, Weston County, and the 4W Ranch? For instance, Prescribed Grazing Practices and Rangeland Health Issues are very regulatory in their context. On pages 15, 16 and 17 of Instruction Memorandum No. WY-2012-019 titled "Livestock Grazing" there are numerous statements on how BLM desires to control the management of livestock in the sage-grouse core areas Wyoming. pg. 15 It is the policy of BLM WY to promote proper livestock grazing management practices that maintain or enhance desired saae-arouse habitat conditions In order to ensure the necessary implementation of these types of practices and protections, this policy IM directs FOs to implement the following practices for all on-going and proposed permits for livestock grazing authorizations and activities in the context of the Wyoming Governor's core population area strategy for Greater Sage-Grouse. Continue to Prioritize oversight and effectiveness monitoring of grazing activities to ensure compliance with permit conditions and that proaress is being made on achieving WYland health standards.Continue to evaluate existing range improvements (e.g., fences, watering facilities) associated with grazing management operations for impacts on Greater Sage-Grouse and its habitat. Coordinate BMPs and vegetative objectives with NRCS for consistent application across jurisdictions where the BLM and NRCS have the greatest opportunities to benefit Greater SageGrouse, particularly as it applies to the NRCS's National Sage-Grouse Initiative pg. 16 Evaluate opportunities to coordinate management plans and strategies on multiple allotments where coordination under a single management plan/strategy would result in enhancing Greater Sage-Grouse populations or its habitat as determined in coordination with the State wildlife agency Where current livestock grazing management has been identified as a causal factor in not meeting Land Health Standards (43 CER 4180), use the process in WO-IM-2009-007, Process for Evaluating Status of Land Health and Making Determinations of Causal Factors When WY Land Health Standards Are Not Achieved, to identify appropriate actions. • Evaluate progress towards meeting standards that mav affect Greater Sage-Grouse or its habitat orior to authorizina arazina on an allotment that was not achievina land health standards in the last renewal cvc/e and livestock was a significant causal factor. • Where monitoring data are not available or are inadequate to determine whether progress is being made toward achieving WYLand Health Standards. An interdisciplinarv team should be deploved as practicable to conduct a new land health assessment in coordination with the arazina oermitteel/essee • Plan and authorize livestock grazing and associated range improvement projects on BLM lands in a way that maintains and/or improves Greater Saoe-Grouse and its habitat o Incorporate management practices that will provide for maintenance	All	Both	rmc0034rm

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	and/or enhancement of saae-arouse habitats includiaa specific attention to maintenance of desired under stodes of sagebrush plant communities. o In determining appropriate management actions that will be considered, refer to the document "Grazing Influence Management and Objective Development in Wyomimis Greater Sage-Grouse Habitat" (Cagnev eta/. 201 0) for guidance. ------The information and discussion matedals found within this document wiU orovide resource professionals in BLM WY in planning livestock grazing strategies that meet the objectives of the Wvomina policv and strategy pg. 17 o Evaluate and implement grazing practices that promote the growth and persistence of native shrubs, grasses, and forbs. Grazing practices include kind and numbers of livestock, distdbution seasons of use and other livestock manaaement practices needed to meet both livestock management and Greater Sage-Grouse habitat objectives. o If land treatments and/or range improvements are the primarv action for achieving land health standards for Greater Saae-Grouse habitat maintenance or enhancement clearlv disolay tbe effects of such actions in the alternatives analvzed 6 All of the above are regulatory in nature and thus do not follow the guidelines of EO 2011-5. Neither do they conform with NEPA and the NEPA Process as required by the Council on Environmental Quality and CFR 1500 - 1508.			
582.	Question: "Subject: Greater Saae-Grouse Habitat Manaaement Policy on Wyomina Bureau of Land Manaaement (BLM) Administered Public Lands IncludinQ the Federal Mineral Estate. " also "and regardless of land ownershio patterns. " When referring to the Federal Mineral Estate and and regardless of land ownership patterns is the BLM saying that our split-estate lands will be subject to the guidelines of this document? Will the BLM or the Forest Service be dictating how, when and where we will be grazing our livestock on our private surface estate? This must be clarified immediately.	All	Both	rmc0034rm
583.	Predation, along with mineral production and disease are the 3 greatest factors affecting the survivability of the sage-grouse, far over shadowing livestock grazing as a possible culprit.	All	Both	rmc0034rm
584.	In fact the use of Prescribed Fire on the range is a Federal Land Management action to clear lands and make them more productive for the Grazing Industry. It's a practice that has been used for the last 20 years that is now recognized as producing unwanted effects in Sage Grouse habitat.	All	Both	rmc0036GB
585.	Other detrimental effects of the Grazing Industry are known and documented in the literature. It's been my observation that most published information critical of the Grazing industry is suppressed by the Cattle Industry and discounted whole sale as "Environmentalist". One such book by Denzel Ferguson titled "The Sacred Cow at the Public Trough" was widely decreed as Environmentalist Clap-Trap when it was published in the early 1980's; even though it was well founded in fact The ODFW may wish to review some outside sources of information in preparing revisions.	All	Both	rmc0036GB
586.	The conservation alternative would correctly require BLM and the Forest Service to identify and protect their breeding, brooding and winter habitats. In these habitats, the BLM and Forest Service must not allow human disturbance such as oil and gas drilling, power lines, and excessive cattle grazing that reduces the vegetation cover below what these animals require. The BLM and Forest Service have, for decades, found ways to evade and obfuscate out of their mandate to maintain viable and widespread populations of the Sage Grouse and other wildlife, rolling under a pseudo-legalistic rug each successive geographic and demographic vanquishing of the Sage Grouse. Over'the long saga of this species, each year has brought further population losses, with precious little acknowledgement by the BLM and Forest Service of this cumulative loss over time.	All	Both	rmc0037RM, rmc0070GB

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587.	Excessive grazing in particular has dramatically altered the vegetation community of semi-arid habitats through the Great Basin, for very little economic value in the forage utilized, representing a gross failure by the BLM to roughly balance the marginal values of competing uses. As a former resident of Utah and New Mexico, I was astounded by the willingness of the BLM to strip vast areas of desert, sagebrush, and semi-arid grassland of their very thin vegetation cover for an extremely meager biomass volume of livestock feed, supplementing the diet of an extremely small number of cattle for a correspondingly minute number of ranchers. If the BLM is to uphold its mandate to provide an equitable and reasonable balance of values to the American people, it must protect these precious ecosystems and the Sage Grouse that lives among them, not strip them for the piddling bit of livestock-palatable biomass that provides their physical scaffolding.	All	Both	rmc0037rm, rmc0070GB
588.	I believe livestock grazing is compatible with the "Multiple Use" mandate for Federal lands in the western United States. Livestock grazing provides a stable, long-term economic base for many western counties.	All	Both	rmc0038GB
589.	Upon review of the documentation provided at the Susanville public meeting I have concerns related to the restrictions already being discussed for livestock grazing within the NEPA planning process. A BLM instruction memorandum sent to all field offices states, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage Grouse habitat on public lands." The National Greater Sage-Grouse Planning Strategy lists grazing as fifth on the list of identified threats to the greater sage-grouse. What potential financial constraints have been identified for the other primary threats? Why is enhanced management of livestock grazing the solution for other threats?	All	Both	rmc0038GB
590.	Livestock grazing was introduced to the western states in the 1860's. Region wide declines in sage grouse populations were not documented until after the middle of the 20th century. Were sage grouse and grazing compatible for the first 100 years of coexistence but not in the last 50? What changed? I do not believe one industry should bear the economic burden of improving sage grouse habitat when there are multiple threats identified for the species.	All	Both	rmc0038GB
591.	As livestock grazing is often a significant contributor to the economic health and social fabric of rural counties, care must be taken to avoid prescriptive management practices that would impair or eliminate that industry.	All	Both	rmc0038GB
592.	Political interests should not be allowed to water down needed sage grouse protections. The new plan needs quantifiable objectives- especially with regard to livestock grazing. General ideas for evaluating management activities are not enough. Specific protection measures need to be required. Guidance and enforcement are necessary. For example, saying merely that land managers should plan livestock grazing and "range improvement projects "in a way that maintains or improves Greater sage grouse and its habitat" is clearly inadequate and too wide open to interpretation. For one thing, maintaining current conditions obviously will not save the sage grouse.	All	Both	rmc0039GB
593.	Additionally, Sanpete County is a predominately agriculture county. Our farmers and ranchers rely on the Forest as well as the BLM lands for grazing. It was hard to determine exactly from the maps who will be impacted by conservation measures included in the BLM and Sanpitch Mountain Range LUPs specific to our county, but we would hope that a cooperative management strategy would be proposed for those farmers and ranchers who use grazing permits in those areas.	All	Both	rmc0043GB
594.	The Board believes the BLM already has a wide range of regulatory mechanisms in place to manage grazing on public lands. We do NOT believe additional mechanisms are required for the regulation of grazing. Any new Conservation Strategies regarding improved grazing practices MUST be based on sound science relevant to site-specific conditions and not on	All	Both	rmc0050GB

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	political pressures and agendas of outside organizations.			
595.	Many permittees have voluntarily implemented adaptive grazing management strategies to encourage Sage-grouse Conservation on their allotments and private lands, and many of the recent permit renewals have included such measures. The Board requests that the BLM make every effort to work collaboratively with permittees to recognize and use grazing as a tool to enhance Sage-grouse conservation. For example, the use of grazing to reduce fine fuel loads and noxious species could greatly enhance efforts related to "integrated vegetation management" and "wildfire suppression and fuels management." Also, prescribed grazing can be used effectively to improve or enhance Sage-grouse habitat as noted in the Report.	All	Both	rmc0050GB
596.	The Board is adamantly opposed to developing more cumbersome regulatory mechanisms specific to grazing or seeking to defer or retire allotments that would permanently eliminate a proven conservation tool and vital management option. This approach may result in negative management impacts on associated private lands and economic impacts to rural communities that are vital for long-term Sage-grouse conservation.	All	Both	rmc0050GB
597.	Under the "Range Management" Section, this Report describes negative effects of "historic overgrazing" and "direct effects of herbivores on sage-grouse, such as trampling of nests and eggs." The current grazing industry and individual permittees should not be held accountable for historic overgrazing due in part to a lack of regulatory controls, and ineffective federal management. The report is deficient in identifying the current grazing regulations that have curtailed the lack of management in the past. In addition, statements such as "trampling of nests and eggs" are out of context and do not belong in a technical report without a scientific citation to support such as statement. Some concepts explored in this section such as maintenance of residual cover are very site-dependant, and should be identified as such.	All	Both	rmc0050GB
598.	The consideration of changing "season of use", "number of livestock", "distribution of livestock", "intensity of use" and "type of livestock" to accommodate seasonal Sage-grouse habitat requirements MUST be based on sound science and not political pressures. These options are already considered as part of the current permitting process. Any considerations MUST include working with the permittee to identify a system that is feasible for the operation based on site-specific conditions and requirements of the involved ranching operation.	All	Both	rmc0050GB
599.	The section on "Retirement of Grazing Privileges" is offensive and completely unnecessary. By retiring grazing privileges, the BLM would be eliminating a key management option and discouraging a spirit of cooperation. The Board is ADAMANTLY OPPOSED to this option being included in the PEIS!	All	Both	rmc0050GB
600.	The "Grazing Permit/Lease Issuance/Grazing Management" section states, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Sage-grouse habitat on public lands." The BLM has properly acknowledged that grazing was not identified by FWS as a primary threat to Sage-grouse, and as such, new "regulatory mechanisms" should NOT be developed in a manner that is punitive. Rather, current regulations and procedures should be developed that provide a greater degree of cooperation and flexibility between the BLM and permittees.	All	Both	rmc0050GB
601.	The new mandate for NEPA analysis for permit/lease renewals to have a range of "reasonable" alternatives that includes a new deferred or rest-rotation system, and includes a "no grazing", "increased grazing", and "decreased grazing" is a major	All	Both	rmc0050GB

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	concern to this Board. Because different grazing systems are tools available to tailor to both the resource need and the ranch operation, they should be referenced as such, rather than emphasized as are the two mentioned above. If a permittee is meeting their rangeland health standards, or is making progress towards them, or if livestock is not the reason for not achieving standards, they should not be subject to alternatives that include no grazing or significantly reduced grazing. This is an unwarranted punitive policy to operators who are constantly working to maintain or improve range conditions, and ripe for abuse in how the policy is administered and more importantly how it is addressed in court. The Board requests that this policy be removed or significantly altered in the Draft PEIS.			
602.	FIRST We suggest that a comparison study be completed comparing levels of sage grouse production on private lands owned by the Sorensen Family in Secret Valley to that of lands where livestock have been excluded for sixteen years now - which are located midway along the Mary's River, above the old Hawks Place. Perhaps, if a study of this nature was completed it would go a long way in dispelling the myth that livestock grazing has been a leading cause of habitat degradation, harmful to sage grouse.	All	Both	rmc0054GB
603.	SECOND Agency personnel need to assess the part that domestic sheep have played in increasing winter range health and productiveness in the Great Basin since the time of first settlement.	All	Both	rmc0054GB
604.	A study needs to be completed which will confirm or discredit those advocating the use of livestock for the purpose of preventing plant stagnation or opening up canape cover for the benefit of wildlife.	All	Both	rmc0054GB
605.	In our travels throughout the Great Basin and elsewhere throughout the intermountain west during the last forty years we have spoken to and interviewed hundreds of people - some ranchers, some farmers, outdoorsmen, hunters, sheepherders, sheepmen, cowboys and nature lovers, and not once have we had someone tell us that they witnessed sage grouse being killed when encountering fences or fence lines.	All	Both	rmc0054GB
606.	4. Livestock Grazing: In Nevada, the most productive sage grouse areas have a long uninterrupted history of livestock use. Livestock use can be beneficial, neutral, or detrimental to sage grouse. A broad brush statement cannot be made one way or the other. Timing, length of period of use; periods of rest: class of livestock; distribution of use are among factors that apply in sage grouse habitat. Studies have shown that sage grouse prefer meadow areas that are grazed over rested areas. Grazing can create A patchwork of tall and short cover, a variety preferred by sage grouse. Grazing has less seasonal impact on upland sagebrush dominated sites, here change is slow.	All	Both	rmc0057GB
607.	Sage Grouse survival depends on some degree of removal of vegetative material. Green shoots that are both palatable and nutritious are necessary for a portion of the year. Survival also depends on sufficient habitat to nest in and sufficient habitat to survive the winter. Managed grazing by domestic cattle and sheep has provided these needs.	All	Both	rmc0057GB
608.	To suggest removal of all grazing on public land also suggests increased fuel and uncontrolled burning of sage grouse habitat, a result that the birds may not survive. The extremist view of removal of all grazing on public lands is far beyond llextent or range of view" involved in this scoping effort. Rather, the retention of a viable ranching industry on public lands is vital for the bird's survival.	All	Both	rmc0057GB
609.	As a representative of livestock grazing interests, we are confused over the allegations of "inadequate regulatory mechanisms". Based on the terms and conditions of livestock grazing permits, based on the obligations to meet healthy rangeland standards and guidelines, where are the actual shortages of not having enough control over livestock grazing or	All	Both	rmc0058GB

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	other multiple-use? We know of many allotments meeting the standards for healthy rangelands, and are troubled that this doesn't seem to be sufficient to be a response for the U.S. Fish and Wildlife Service's indictment of "inadequate regulatory mechanisms". We see examples of instances when livestock grazing is not attributed as a cause for healthy rangelands and still see grazing permit changes made. This is still more vilification that livestock grazing "can have localized adverse effects on Greater Sage-Grouse habitat" (as quoted in the Instruction Memorandum 2012-043).			
610.	Given the potential for beneficial gains to enhance protection of habitat areas (especially for the management of fine fuel loads and invasive plants) properly-managed livestock grazing should be evaluated for land use plans in the context of a tool to assist in accomplishing rangeland health objectives. These considerations need to be documented and advanced in a proactive, unapologetic manner. Because livestock grazing, as is also the case with any number of other authorized uses, are managed with a significant set of regulatory oversight and jurisdiction, we maintain that the implication of there being a lack of regulatory control is a false pretense for further expansion of the regulatory regime. We further maintain that a de ired consistency for land-use decisions to be pre-oriented to rejections of proposals does not constitute "regulatory consistency". The measurement of "regulatory adequacy" should be whether land-use decisions, carried out through the current NEPA evaluation process, result in sound management actions that are site-specific and consistent with improved habitat conditions that match the needs for the Sage-Grouse populations that inhabit the specific area.	All	Both	rmc0058GB
611.	Another major issue is the interrelationship of responsible livestock grazing and wildfire management and prevention.	All	Both	rmc0063GB
612.	We recommend that the BLM/FS look for opportunities to incorporate or merge multiple grazing allotments under a single landscape based management plan. Sage-grouse are a landscape species not a single allotment species. These landscape opportunities should be identified LWGs. Livestock grazing constitutes a major land-use within Utah LWG areas. As such it is and can be an important component to sage-grouse persistence in Utah. We encourage the BLM/FS to be open to innovative process such as landscape-based grazing allotments as a tool in improving grazing management practices.	All	Both	rmc0066GB
613.	We agree and encourage several reasonable aiternatives be analyzed in each NEPA document prepared dealing with grazing. The LWG plans identify proper grazing as an important tool for sage-grouse habitat management. To even consider a no-grazing alternative would be contrary to LWG sage-grouse plans, impact local economies, and be contrary to the multiple use concepts. Conversely, we strongly encourage alternative practices to include deferred or rest-rotation systems implement on a landscape level simultaneously across multiple allotments. This may require "blurring" jurisdicational boundaries, but may provide the best option to achieve sustainable sage-grouse conservation and local communities.	All	Both	rmc0066GB
614.	My biggest concern is that this will in someway inhibit grazing on the grasslands. As a TBGA Board member I don't want any of our permitees to lose AUM's. We need to preserve our rights to graze the land in The Thunder Basin National Grasslands, as well as defend private property rights.	CO	Both	cfc0019RM
615.	Appropriately, the GSGCM report does not apply, nor does Garfield County suggest, the 4-mile 'no surface occupancy' and a maximum 3% disturbance approaches that would effectively prohibit existing grazing on established allotments. Garfield County supports the approach provided in the Parachute-Piceance-Roan Greater Sage-Grouse Conservation Plan for the appropriate management of domestic livestock and wild ungulates. In doing so, the EIS should carefully consider and potentially implement the following goals:	CO	Both	emc0058RM

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	1) Continue to foster a sustainable and economically viable ranching community while also providing high-quality sage-grouse habitat; and 2) In conjunction with sustainable livestock interests and sport hunting industries, ensure that grazing by other ungulates is not adversely affecting sage-grouse habitats.			
616.	First, we request that the BLM EIS process consider the voluntary commitment that the local Sage-Grouse Work Groups in Colorado have demonstrated toward improving habitat conditions for sage-grouse. Local Work Groups have developed long-standing, cooperative working arrangements across private and public lands. For example, in North Park, the Owl Mountain Partnership, a partner to the NPSGWG, has formed public/private partnerships and developed large-scale grazing management plans across BLM, State, and private lands. The grazing management plans have improved grazing management and improved habitat conditions for sage-grouse. The NPSGWG requests that the BLM analyze the impacts which "over regulation" might have on these cooperative and voluntary efforts to conserve sage-grouse. Regulating all uses on the BLM so they benefit sage-grouse over other uses, as suggested in the NTT report, may have an increased negative effect on greater sage-grouse because people will no longer voluntarily engage in proactive practices for the benefit of the sage-grouse. In addition, displacing activities from BLM to private lands could potentially have negative impacts to some of the most productive sage-grouse habitat on private lands. We request that the BLM consider these negative impacts in the EIS analysis.	CO	BLM	emc0060RM
617.	The NPSGWG also requests that the EIS consider the variability in BLM Field Offices and how they have managed grazing in the past. The EIS should not be a "one-size-fits-all" approach. As mentioned above, the Kremmling Field Office has been extremely proactive in terms of grazing management. Only one allotment in last five years has not met minimum land health standards.BLM, HPP, and CPW have implemented a seeding project and grazing deferment in the allotment to bring it back to minimum standards. Grazing management in North Park is working. In 2010, the CPW conducted over 100 vegetation measurements at sage-grouse nest and female late-summer use sites. Vegetation measurements indicate that grazing management on BLM and private land is meeting the structural guidelines outlined in the Colorado Greater Sage-Grouse Conservation Plan (2008). CPW also documented good nesting success in 2010 with 47% of nests hatching at least one egg and better nest success in 2011 with 64% of nests hatching. North Park probably has the most stable greater sage-grouse population in Colorado and we believe this is a result of the good grazing management in Jackson County.	CO	BLM	emc0060RM
618.	NPSGWG partners and the BLM are already taking a proactive approach to improving range projects for greater sage-grouse. For example, we have been installing high visibility top wire on fences to reduce mortality to sage-grouse. New water developments all have a sage-grouse design component to allow for an overflow wet seep.	CO	BLM	emc0060RM
619.	The NPSGWG also requests that the EIS conduct a thorough analysis of the potential impacts of applying NTT measures prioritizing sage-grouse over livestock management and structural range improvements because if measures designed to improve habitat for sage-grouse end up making it impossible for ranchers to make a living, then some of them may end up having to subdivide their land. Housing development scattered throughout North Park would have detrimental impacts to sage-grouse.	CO	BLM	emc0060RM
620.	Ranching has a long, rich history in the Northwestern Colorado. Ranches in Western Colorado rely on public land grazing leases for survival and to make a contribution to the nation's food supply. Grazing and sage grouse habitat are inextricably	CO	Both	emc0068RM

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	related. Properly managed, grazing will enhance sage grouse habitat; indeed there is a direct correlation to reduction in grazing and reduction in the number of sage grouse.			
621.	The objective to disturb no more than 3% of habitat regardless of ownership is totally objectionable. Areas of private ownership should not be considered in this 3%. The area covered by the 3% is not defined - is it 3% of the entire map or 3% of a section? Livestock should not be included in this.	CO	Both	emc0069RM
622.	Retirement of grazing permits should only be considered with a willing permit tee and should not become an issue when a property is sold or transferred to another person or entity.	CO	Both	emc0069RM
623.	Throughout the years of my observations, it is very obvious to me that the majority of the sage-grouse inhabit areas that are located where livestock are grazed. Removal of livestock will not enhance sage grouse habitat; in fact, it will be detrimental to the grouse.	CO	Both	emc0069RM
624.	The following recommendations must be analyzed as a starting point for effective conservation: Increase the amount of protected priority habitat by aggressively pursuing available tools, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts.	CO	BLM	emc0070RM
625.	The BLM should consider a 'conservation alternative' that: - Includes conservation measures recommended by the NTT Report, with improvements, including, but not limited to the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with addition of further conservation measures, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,31 thus negating the value of designated priority habitats. Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions.	CO	BLM	emc0070RM

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	- Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT.			
626.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Consider ACEC designation in high biological value areas that, although encumbered by valid existing rights, are not yet developed. This may be particularly feasible where actual development potential is low despite the existence of valid existing rights (e.g., due to speculative leasing in areas of low energy potential). It may also be feasible in areas where other constraints (e.g., lack of infrastructure, other resource conflicts) will make development relatively difficult and costly. Management of ACECs designated in such areas could include aggressive pursuit of available tools to increase the amount of protected habitat, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts. This is important, as Doherty et. al. (2011) found that 1/3 of the 25% core areas have been leased for oil and gas development. Further, 44% of areas with high biological value are at risk for energy development.	CO	BLM	emc0070RM
627.	CPW believes the following range-wide threats pose the greatest risk to greater sage-grouse populations and their habitats (not in order of risk): Inappropriate livestock management can have long term negative impacts to sage-grouse habitat. BLMIUSFS should expedite changes in grazing management to bring range conditions up to the standard where Land Health Standards are not met within an allotment.	CO	Both	emc0072RM
628.	CPW recommends that the USFS work with allotment permittees to address any identified grazing management issues sage-grouse habitat as well as provide for deferment when vegetation restoration projects are in the early stages of establishment.	CO	USFS	emc0072RM
629.	Wildlife Impacts Should be Evaluated There have been acknowledgements by federal and state land management agencies in Colorado that Colorado Parks and Wildlife claims authority over wildlife while the BLM claims authority to manage the habitat which they graze. Although this may be true from the strictest legal sense, it is unsettling from a concept of managing Sage-grouse. There are areas of Moffat County that Colorado Parks and Wildlife acknowledges higher than acceptable wildlife numbers. Moffat County would like to clarify that we do not support livestock numbers being reduced in areas where wildlife are overstocked on the rangeland.	CO	BLM	emc0076RM
630.	I feel that a one size fits all approach will do more harm than good. I think that the range managers and the private land owners will need a plan that will benefit the Sage Grouse and still allow grazing. Aggressively changing in grazing on BLM Property could actually do more harm than good. By changing the grazing rules, ranchers would have to change grazing practices on private property that could negatively impact Sage Grouse summer habitat.	CO	Both	emc0077RM

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631.	I think that the grazing management plan in Jackson County is working, vegetation measurements indicate that grazing management on BLM and private land is meeting the structural guidelines outlined in the Colorado Greater Sage Grouse Conservation Plan. This is because we have a good grazing plan in effect and private land owners and the BLM are working together.	CO	Both	emc0077RM
632.	I think that we need to be able to do sage brush treatments. This will enhance and or restore sage-grouse habitat and keep the grass in good health for grazing.	CO	Both	emc0077RM
633.	(One of the NTT recommendations most important for Routt NF) "Implement management actions (grazing decisions, AMP/Conservation Plan development, or other agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements… Consider singly, or in combination, changes in: 1) Season or timing of use; 2) Numbers of livestock (includes temporary non-use or livestock removal); 3) Distribution of livestock use; 4) Intensity of use; and 5) Type of livestock.." Id. at 15. "Only allow treatments [that increase forage for livestock and/or wild ungulates] that conserve, enhance or restore sage-grouse habitat (this includes treatments that benefit livestock as part of an AMP/Conservation Plan to improve sage-grouse habitat)." Id. at 16.	CO	USFS	emc0175RM
634.	V. AMEND THE ROUTT PLAN VIA MECHANISMS THAT WILL BEST HELP CONSERVE GSG. The current Forest Plan direction potentially applicable to GSG conservation (SRC at 5-6) is inadequate to ensure survival and recovery of the species. None of the measures are specifically geared toward protecting GSG, and none of the oil-gas lease stipulations apply year-round. In order to ensure the highest likelihood of conserving GSG, the Forest Service will have to limit human uses of GSG habitat and surrounding areas. It will be especially important that no oil-gas leasing or mineral development be allowed on any GSG habitat and some adjacent land. No road construction can be allowed in GSG habitat, subject to valid existing rights. Livestock grazing may have to be adjusted. Also, as is discussed in part 3 below, the current management prescription assigned to the draft core areas is not appropriate for ensuring the protection of GSG. Thus new Forest Plan direction is needed to incorporate the recommendations outlined by the National Technical Team and ensure the best chances for recovery of GSG populations. The agency should amend the Routt Land and Resource Management Plan via the following methods, using point 1 alone, or preferably, in combination with points 2 and/or 3:	CO	USFS	emc0175RM
635.	A critical look at the relationships and dependence between livestock grazing and the Sage-grouse. There are a number of sound scientific studies that have shown well-managed livestock grazing is both compatible with and beneficial to Sage-Grouse habitat conservation. Grazing reduces the instances and severity of wildfires (Launchbaugh et al. 2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner	CO	Both	emc0178RM

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	et al. 1994, Evans 1996). It has also been used to control invasive weeds (Olson and Lacey 1994, Walker et al. 1994). BLM's own Instruction Memorandum No. 2012-043 states "Depending on design and application, grazing practices can also be used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to Greater Sage-Grouse and its habitat. Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands."			
636.	Sage grouse have been effectively accomodated by cooperation between agencies and ranchers in the Gunnison Valley. Why not learn from them?	CO	Both	fln00009RM
637.	The nations taxpayer's money has been doled out through the BLM, SCS, and other agencies to remove sagebrush, make meadows, and build ponds on low sagehen breeding grounds. All of these projects fail to consider these birds or their needs as long time residents of the country.	CO	Both	rmc0016RM
638.	The EIS should consider studies completed by CPW, including those by Clayton Braun and Anthony Apa, in evaluating the impact of surface uses such as grazing and recreation, and mineral development including oil and gas and mining on the Greater Sage Grouse. Certainly sage grouse have been shown to benefit from proper livestock grazing (Bainter et. al2009, Briskc et. al2005), which has occurred on these lands for over 1 00 years. Groundtruthing impacts before applying severe limitation or no activity is a necessity, but expensive. Reconciliation or reducing the imbalance ohvildlife AUMs should be addressed in the EIS. Livestock numbers should not be reduced at a severe cost to producers just because wildlife numbers are so high.	CO	Both	rmc0050RM
639.	The following recommendations must be analyzed as a starting point for effective conservation: Increase the amount of protected priority habitat by aggressively pursuing available tools, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts.	East	Both	emc0089RM
640.	iv. The BLM and FS should analyze an alternative that provides more protection than that afforded by implementation of the National Technical Team's Recommendations. The BLM and FS should consider an alternative that: - Includes conservation measures recommended by the NTT Report. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT. - Incorporates improvements to the NTT's recommendations, including the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to	East	Both	emc0089RM

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	restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with improvements, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,10 thus negating the value of designated priority habitats. o Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions.			
641.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Consider ACEC designation in high biological value areas that, although encumbered by valid existing rights, are not yet developed. This may be particularly feasible where actual development potential is low despite the existence of valid existing rights (e.g., due to speculative leasing in areas of low energy potential). It may also be feasible in areas where other constraints (e.g., lack of infrastructure, other resource conflicts) will make development relatively difficult and costly. Management of ACECs designated in such areas could include aggressive pursuit of available tools to increase the amount of protected habitat, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts. This is important, as Doherty et. al. (2011) found that 1/3 of the 25% core areas have been leased for oil and gas development. Further, 44% of areas with high biological value are at risk for energy development.	East	Both	emc0089RM
642.	i. Lander, WY RMP Alternative B stresses avoiding construction of new infrastructure (such as fencing) and instead focuses on livestock grazing management throughout seasons of use and lower forage utilization. This alternative includes the removal or modification of existing fences when and where opportunities exist.	East	Both	emc0089RM
643.	i. Lander, WY RMP Alternative B stipulates light livestock grazing levels in areas typically preferred by cattle, such as riparian-wetland areas, adjacent upland areas, and around salt and mineral supplements and water troughs and developments. Also, Alternative B prohibits salt or mineral supplements within 0.5 mile of riparian-wetland habitats to prevent livestock congregation at water	East	Both	emc0089RM

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	sources. Alternative B prohibits the placement of salt or mineral supplements within 0.6 mile of greater sage-grouse leks. All these provisions would protect important sage-grouse habitats (foraging areas, breeding areas, nesting areas) from livestock trampling and the impacts of heavy plant utilization.			
644.	Livestock grazing is described as a diffuse disturbance while the IM ignores other direct and diffuse disturbances, including wild horses, wildlife herbivory and hunting. Technical Team Report at p. 14. It is difficult to understand the basis or the criteria used. VRLP views this portion of the Technical Team Report is naked attack on livestock grazing that merits sanctions for its lack of merit. The recommendations for grazing show a fundamental lack of knowledge about grazing regulation and other grazing animals. In most western states, livestock numbers have declined while wildlife and predator numbers have increased. Ex. 1 pp. 3-4; Ex. 1A pp. 6-9 (grazing created more favorable habitat conditions for sage grouse). The RMP revisions need to develop the data regarding big game, wild horses and livestock numbers for each project area. Livestock grazing initially set in motion plant succession that created sage grouse habitat and predator control in defense of livestock made it a safe environment for sage grouse. Ex. 1A pp. 9-10. Livestock grazing on the majority of the allotments has been managed under use limits, rotations and stocking rate limits. It should be noted that an important difference between livestock grazing and wild horses/big game is that the entire annual increase of livestock is removed each and every year and sent to market. This is not the case, especially with wild horses. Healthy native range is as important to range livestock production as it is to sage grouse. The premise that livestock grazing as currently managed adversely affects sage grouse or sage grouse habitat lacks documentation. Ex. 1A p. 8. Livestock do not eat sagebrush which is the winter cover and food source for sage grouse. Livestock do not directly harm sage grouse. For more than 15 years, grazing has been regulated under rangeland health standards. 43 C.F.R. §4180.2 (grazing must meet, maintain or make progress towards meeting range health standards). These standards were developed to protect and improve riparian areas, native vegetation and plant health and cover for all rangelands, which contributes to improvement of sage grouse habitat. Virtually all operators use a deferred or rest rotation system and do not use the rangelands year-round, unlike some wildlife and all of the wild horse herds. To the extent that the criteria are not consistent with rangeland health standards, they must be ignored or set aside because rangeland health standards are mandated by regulation which supersedes an IM. 43 C.F.R. Part 4180. T he Technical Team Report conservation measures appear to attribute livestock use to the decline in sage grouse habitat, Ex. Pp. 3-4. This ignores the irreplaceable role that grazing plays in reducing fuel loads, improving plant palatability and vigor. If livestock grazing were removed, the private land associated with these ranches will be subdivided, with a loss in wildlife habitat and recreation access. The trend towards subdivisions accelerated after BLM contended incorrectly that livestock grazing caused the desertification of western rangelands, declines in wildlife habitat, and water quality degradation in the contest of the grazing rules revision. If BLM is going to require removal of livestock during key periods of its life cycle, Technical Team Report at p. 15 (implement management actions which could include temporary non-use or livestock removal), it must do so for all other herbivores, including wild horses. It is not feasible to remove all herbivores, and for the same reason, it is ridiculous to assume that	East	Both	emc0155rm

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	livestock should be removed as well. The recommendation to retire grazing privileges is unwarranted. BLM could improve rangeland health more quickly by moving wild horses onto private lands in nonpublic land states. The Technical Team Report also fails to recognize the stewardship of the livestock industry.			
645.	VRLP believes that continued management of public rangelands to meet healthy standards will also ensure viable populations of sage grouse for decades to come. VRLP supports adaptive management but IM 44, Technical Team Report leaves noroom for adaptive management. BLM should adopt the object of managing for rangeland resources and rangeland health and monitor population numbers. Then if there are changes in numbers, BLM would adjust based on the factors specific to thensite.	East	Both	emc0155rm
646.	The Technical Team cites potential impacts of livestock on sage-grouse and their habitat to include long-term changes to habitat due to herbivory, the trampling of nests and eggs directly by livestock, altered sage-grouse behavior due the presence of herbivores, and impacts on sage-grouse due to structures associated with grazing management (p. 14). Land use plans should incorporate coordinated livestock grazing and sage-grouse habitat objectives in all grazing allotments or permit renewals in priority sage-grouse habitat and . Particular emphasis should be placed on how grazing effects sage-grouse nesting and early brood-rearing habitat, as grazing appears to have the greatest impact on such habitat, notably in terms of availability of cover. In their 2010 report titled Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-Grouse Habitat With Emphasis on Nesting and Early Brood Rearing, the authors state, "While grazing management has limited effect on sagebrush, grazing management is important in terms of effects to height and density of herbaceous material available for hiding and cover." A sagebrush/bunchgrass community provides the highest quality sage-grouse nesting and early-brood rearing habitat available, as well as good livestock forage (Cagney, et al., 2010). At a minimum, plans for grazing management on sage-grouse habitat should focus on two aspects of plant health: (1) promoting desirable plant communities in the long term, and (2) annually managing standing crop to provide cover for sage-grouse. In general, appropriately timed grazing with moderate utilization levels will maintain plant communities in the preferred ecological state (sagebrush/bunchgrass) and will promote vigor and sage-grouse values in less-preferred ecological states (Briske, et al., 2005). Moderate utilization should reflect percentage of key species utilization as defined by rangeland health standards for a given geographic region. Most often, moderate utilization results in less than 35 percent use on total herbaceous vegetation and less than 60 percent use of key species (NRCS). Moderate utilization is also critical in that it ensures residual cover, which increases the effectiveness of precipitation by: 1) impeding run-off, 2) enhancing infiltration into soils, and 3) helping retain organic material in the soil.	East	Both	emc0167RM
647.	Federal agencies should incorporate the following recommendations in all grazing management plans associated with priority sage-grouse habitat (adapted from Cagney et al., 2011): - Mating-Leks: Document the location of leks through consultation with appropriate federal or state biologists. Avoid any new sources of disturbance on lek sites (ex. range improvements). - Nesting/Early Brood-Rearing: Maintain a sagebrush/bunchgrass plant community where present. Manage for high vigor across all plant communities. Avoid repeated use of cool-season bunchgrasses during the growing season. Limit utilization to	East	Both	emc0167RM

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	moderate levels to assure previous' year's standing crop for sage-grouse cover; utilization objectives must be applied to locations preferred by livestock (ex. water sources) which may result in lower utilization across the entirety of the management unit. - Late Brood-Rearing Habitat: Avoid repeated grazing of riparian areas in seasons when temperatures are high. - Winter: Avoid levels of browsing on sagebrush that would limit sage-grouse access to their food supply and cover. Avoid heavy use of herbaceous standing crop. Finally, federal agencies should ensure all grazing management plans incorporate achievable objectives, and should develop methods to evaluate and adjust grazing management strategies, preferably annually.			
648.	Grazing Infrastructure: Water Development and Fences Multiple pastures allow for better control of timing and utilization, but often require a greater investment in infrastructure, notably fencing and water development. As sage grouse can be killed or injured by fences, agencies should require permanent fence markers on fences: 1) constructed with steel posts, 2) constructed near leks, 3) bisect winter concentration areas, 4) border riparian areas, or 5) show evidence of previous grouse fence strikes. Agencies should prohibit construction of any fences within 0.6 miles of leks. Wood fences reduce strikes, but provide perch sites for raptors and ravens. Agencies should require the use of anti-perching devices on all wood posts. Generally, unnecessary fences should be removed and new fencing projects limited in sage-grouse priority habitat. Water-troughs can cause unnecessary wildlife mortality, including sage grouse. As required by BLM Instruction Memorandum No. 2007-179, escape ramps should be required in all water troughs/tanks. Overflow areas provide water on the ground, and lessen wildlife mortality. Springs and seeps should be protected from livestock trampling. In areas with documented West Nile Virus, plans should incorporate measures to minimize mosquito habitat, including minimizing areas of standing water with emergent vegetation and, where not possible, treating with a biological larvicide. Ideally, all new water development projects should meet minimum standards set by the Water for Wildlife Initiative (Taylor et al., 2007). As above, agencies should develop methods to evaluate and ensure compliance of all infrastructure projects.	East	Both	emc0167RM
649.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	GB	Both	emc0204GB
650.	Address Impacts of Grazing: The BLM must recognize effects of grazing on sage-grouse, including removal of cover, vegetation composition change, behavioral changes, and impacts from grazing-related infrastructure. Reduction of grazing impacts will necessarily include management changes quantified by conservation metrics tracked through reliable, enforced reporting and analysis.	GB	Both	emc0355GB
651.	Address Impacts of Fencing: Fences increase predator presence and cause direct sage-grouse mortality through collisions. BLM should remove unnecessary fences and limitnew fencing in priority sage-grouse habitat, particularly in nesting and early broodrearing habitat.	GB	Both	emc0355GB
652.	Revisions to Land Use Plans need to adequately outline threats related to grazing and agricultural practices, and consider	GB	Both	emc0355GB

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	conservation guidelines intended to address those threats. Grazing management is important because it affects the height and density of herbaceous material available for sage-grouse hiding cover.24 According to the NTT, potential impacts of livestock on sage-grouse and their habitat include long-term changes to habitat due to herbivory, the trampling of nests and eggs directly by livestock, altered sage-grouse behavior due the presence of herbivores, and impacts on sage-grouse due to structures associated with grazing management (Page 14). The NTT suggests that BLM incorporate management considerations into all grazing allotments or permit renewals in priority sage-grouse habitat (page 14). In order to accomplish conservation objectives, BLM will need to determine methods to monitor compliance by livestock managers and permit-holders as a part of land use planning. The BLM should include comprehensive measures for analyzing the impact of livestock grazing on sage-grouse populations and habitat, and create metrics to be used to measure to achieve conservation goals in allotments. This should include reporting on progress in implementation of modifications of fences, water development, and other management changes required of permit holders by BLM. According to the NTT, "managing livestock grazing to maintain residual cover of herbaceous vegetation so as to reduce predation during nesting may be the most beneficial for sage-grouse populations," and, other "objectives that control livestock movements and grazing intensities can be achieved broadly through rotational grazing patterns or locally through water and salt placements." All methodologies for analyzing environmental impacts should use the most recent science. BLM should employ science-based conservation management practices of livestock—especially during critical times of the year such as wet and early growing seasons for the protection of native forbs and grasses, and biotic soils important to Sage-grouse. Additionally, allotments that are under review should have a full inventory of natural features and sage-grouse habitat addressed in the analysis. Summary: The BLM must recognize effects of grazing on sage-grouse, including removal of cover, vegetation composition change, behavioral changes, and impacts from grazing-related infrastructure. Reduction of grazing impacts will necessarily include management changes quantified by conservation metrics tracked through reliable, enforced reporting and analysis.			
653.	Fences not only fragment a landscape, but they also create perches for raptors. Coates and Delehanty (2010) found that an increase in raven numbers equivalent to one additional raven per 6 linear fencing miles was found to be associated with a 7.4% increase in the odds of sage-grouse nest failure. Fences can also be a significant source of mortality for sage-grouse through direct strikes. BLM Land Use Plans must present conservation guidelines that reflect the most current science on sage-grouse movement and migrations. Recent studies of nest-site selection and nest success have made clear that nest distributions are spatially related to lek locations (Holloran and Anderson 2005, Aldridge and Boyce 2007, Doherty et al. 2010). This is contrary to BLM's reliance on the outdated study of Wakkinen et al. (1992; REA AR 779). Holloran and Anderson (2005) documented 64% of nests occurred within 3.1 miles of leks, 80% of nests occurred within 5 miles of leks, and 20% of nests occurred at distances greater than 5 miles from leks; nest success also was greater the farther a nest occurred from a lek, indicating a disproportionate potential importance of these more distant nests for population recruitment. Based on their results, Holloran and Anderson (2005) concluded that to protect and maintain sage-grouse populations, land managers should	GB	Both	emc0355GB

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	minimize or halt actions that reduce suitability of nesting habitats within 3.1 miles of a lek. BLM should redefine fencing rules within 5 miles of leks. The NTT cites Christiansen (2009) and Stevens (2011) and suggests that, "To reduce outright sage-grouse strikes and mortality, remove, modify or mark fences in high risk areas within priority sage-grouse habitat based on proximity to lek, lek size, and topography." Overall, BLM should work towards removing unnecessary fences and limit new fencing projects in priority areas. Summary: Fences increase predator presence and cause direct sage-grouse mortality through collisions. BLM should remove unnecessary fences and limit new fencing in priority sage-grouse habitat, particularly in nesting and early brood-rearing habitat.			
654.	We have observed that well-managed livestock grazing is an effective and sustainable method for combating several of the most significant threats to sage grouse habitat including fuels reduction to minimize wild fires and to prevent or slow invasive species and conifer proliferation. While the ESA does not provide for the cost of a mitigation strategy to preclude its implementation, funding to implement strategies is none the less naturally limited. Our continued ability to serve a broad spectrum of multiple-use industries is crucial to maintaining their ability to provide beneficial habitat management and their financial viability to implement appropriate mitigation measures. Minimizing wild fires also protects our infrastructure from damage and reduces our need to mobilize crews and equipment to rebuild power lines in areas which may be sage grouse habitat.	GB	Both	rmc0056GB
655.	As recognized by the BLM in IM No. 2012-043, grazing can be "used as a tool to protect intact sagebrush habitat and increase habitat extent and continuity which is beneficial to the Greater Sage-Grouse and its habitat." The IM continues, "Given the potential financial constraints in addressing the primary threats identified by the FWS, enhanced management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." According to Natural Resources Conservation Service (NRCS), grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition."	GB	Both	rmc0056GB
656.	Sound scientific research indicates that grazing is beneficial to the greater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires. (Launchbaugh et al. 2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et al.1994, Evans 1996). It has also been used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994).	GB	Both	rmc0056GB
657.	There is much discussion about nest trampling by livestock but poor evidence that suggests it occurs regularly on Great Basin Rangelands. The conditions that appear to lead to nest trampling do not exist on Great Basin rangelands (see attached article). Again, we reiterate that rule making that occurs because of this EIS should be based on probability of activities having an adverse effect, not mere potential that something could happen. Rules and policies need to be based upon the actual conditions under which adverse effects are likely.	GB	Both	rmc0067GB

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658.	Fences needed to ensure the success of a grazing management system should not be removed. This includes allotment or pasture boundary fences, drift fences and exclosure fences.	GB	Both	rmc0076gb
659.	The retirement of grazing permits should be a last resort, used only when grazing induced resource degradation across an allotment cannot be prevented. Livestock grazing is a legally recognized multiple use, and is an appropriate land use unless management cannot prevent large scale permanent declines in resource capability and production. In most of the Great Basin, permanent retirement of grazing permits will result in either abandonment of working ranches or their subdivision. Both actions are likely to have greater adverse effects on sage-grouse and other resources than the perceived positive effects of removing livestock. As the national population moves toward 500 million residents by 2050, national food security is going to require some level of food production from arid rangelands. From a national policy perspective, it makes little sense to eliminate working ranches and the institutional knowledge possessed by those who prqperiy manage them.	GB	Both	rmc0076gb
660.	As you consider grazing allotments please keep in mind the agriculture based economy in the Magic Valley and the possible negative impact that the reduction of grazing rights will have on the base economy in Twin Falls County.	IDMT	Both	cfc0021GB
661.	live in Ashton, Idaho and I am a school teacher in Dubois, Idaho. In the spring I travel the Red Road to work every morning which holds a large population of birds with around eight leks along the road. Last year I noticed the rutting was not in full swing until the middle of April and I continued to see activity through Memorial Weekend. Around the first of May there were thousands of sheep along the Red Road starting their grazing especially right smack in the middle of the main lek near Split Rock(the Idaho Fish & Game people out of Idaho Falls know this area well). This lek holds over a hundred birds and I thought to myself then that this could not be a good thing for the birds. The sheep were so thick in there that no nest would have been safe. I don't know how long it takes for the eggs to hatch and the birds are off the nest but I think May 1st is too early and I now believe that domestic livestock is one of the sage grouse's biggest threat. I also know that the two need to co-exist but we don't have any control on what sage grouse do but we can control what livestock does to help the birds. I hope you come up with an effective plan for both parties.	IDMT	Both	emc0048GB
662.	The BLM needs to review the Grazing Policy adopted by the Custer County Commissioners prior to any actions set forth in the Interim Management Policies or Procedures, and the implementation of any alternatives included in the NEPA document.	IDMT	Both	emc0112GB
663.	The Group has developed a sage-grouse conservation plan for Jarbidge Planning Area, which includes the goals outlined below. We ask that the BLM consider these goals as they finalize the Sage-Grouse Planning Strategy. -Maintain or improve livestock operations	IDMT	Both	emc0158GB
664.	While I have concerns for sage-grouse throughout their range, I am most familiar with the area around Leadore, including the Timber Creek, Eighteen Mile Creek, Hawley Creek, Railroad Canyon Creek, and Mill Creek drainages. I have commented on proposals by the Salmon BLM office in the past. It seems to me that the greatest threats to sage-grouse in this area are habitat fragmentation by roads and fences, and reduced availability of forbs and insects for broodrearing. The greatest root cause of these problems is livestock grazing.	IDMT	Both	emc0268GB
665.	The 2006 Jarbidge ESI, conducted as a result of settlement of grazing litigation and which found significant deterioration, is the only comprehensive ESI of which we are aware in recent years.	IDMT	BLM	emc0411GB

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666.	BLM must amend all Land Use Plans including those underway. Plans currently in process have very weak goals, objectives, and uncertain non-mandatory language. Plus they greatly avoid addressing livestock disturbance, removing grazing from lands where there is risk of weed invasion or sagegrouse loss, and otherwise are inadequate. Example: Winnemucca DRMP/DEIS, and the potentially aborted Bruneau RMP.	IDMT	Both	emc0411GB
667.	Here, after this new sage-grouse EIS has started and awareness of the pressing need to address sagegrouse habitats is great, BLM's site-specific analyses of critically important land areas are a throwback to some of the worst livestock centered proposals we have seen. And nearly all of the Garat allotment is mapped as PPH! This shows how terrible BLM's NTT and IMs are when it comes to addressing livestock grazing which is the overwhelming disturbance factor across 200,000 acres of the Garat allotment in the heart of critical sage-grouse habitat – under any habitat segregation scheme. This illustrates the serious long-term entrenched industry-biased agency behavior patterns that must be honestly dealt with in the current effort.	IDMT	Both	emc0411GB
668.	It is important that you recognize that livestock grazing is compatible and beneficial to greater sagegrouse habitat conservation. This has been proven by independent, peer-reviewed scientific analysis. Ranchers are the stewards of the greater sage-grouse habitat on both the private and public range ands. Allowing ranchers the continued use of public lands without unnecessary restrictions due to the potential listing of a species with such a large habitat encourages this stewardship and prevents fragmentation through development. As seen in many areas of successful rangeland conservation, livestock grazing and habitat conservation go hand in hand. Adequate regulatory mechanisms are already in place through rangeland standards and guides to ensure that grazing is managed for ecosystems and sensitive species.	IDMT	Both	flh0000GB
669.	It appears that the agency has overlooked many of the benefits that the continuance of livestock grazing provides. These include: Preservation of open space; Noxious weed and invasive species eradication and containment; Production of forb growth that is preferred by greater sage-grouse to non-grazed areas; Wildfire prevention and controlled burn efforts; Development of wildlife watering sources, including placement of bird ladders in troughs; and Predator control. Rather than undertaking an attitude of restricting livestock, the agencies should utilize grazing as a tool to manage for the U.S. Fish & Wildlife Service's list of primary threats affecting sage grouse in Idaho including fires and invasive weeds.	IDMT	Both	flh0000GB
670.	- Just as grazing improves Sage Grouse habitat, ranching plays a pivotal role in both maintaining Sage Grouse habitat and minimizing other external threats. - Every day, Montana's agriculture producers work diligently to minimize the presence of invasive weeds, to reduce exploding predator populations, to maintain Montana's open spaces, and to prevent fires, all of which seriously threaten Sage Grouse habitat; - This hard work by Montana's agriculture is demonstrated by the fact that Eastern Montana has one of the healthiest, most diverse, grassland ecosystems in the world; - It is because of the work of Montana's ranching community that it is possible for Montana Fish, Wildlife and Parks, the state agency responsible for wildlife management in Montana, to translocate sage grouse from this State to Canada and other places where sage grouse populations are less healthy; - Sage grouse populations in Montana are generally healthy because ranchers and federal land agencies have worked cooperatively for decades to preserve this species;	IDMT	BLM	rmc0021GB

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	- As a result, MWGA's membership recommends that BLM analyze the importance to sage grouse of BLM partnering positively with and seeking input from agriculture producers as to proper sage grouse management and habitat; - As part of this analysis, BLM should address and set forth measures that can be taken to keep ranches economically viable; - Further, the BLM should analyze the negative impact that amending the RMP's could have on the existing on the ground conditions in Montana, which, as noted above, presently provides the best habitat in the world for sage grouse populations; - What is more, MWGA's membership feels that the EIS and SEIS alternatives should include detailed proposals to ensure that Montana's sheep producers can continue to carry out these cooperative practices. These elements might include: a. grandfathering long-established range structures into management plans; b. maintaining grazing permit numbers at their present economically feasible levels; c. limiting the ability of self-styled environmental groups to excessively litigate sage grouse management efforts and to reap financial windfalls from the same; d. and providing grant funding to livestock producers for sage grouse management efforts			
671.	The Dillion Local Working Group identified 5 key issues in the area: 5. Unsustainable or incompatible grazing	IDMT	Both	rmc0028GB
672.	A Resolution establishing an interim policy of the Custer County Commissioners that no allotments or individual permittee's livestock numbers and/or season of use be lowered because of the declaration of critical habitat; and that any and all activities in regard to such changes in numbers and/or season of use must be coordinated with the Custer County Commissioners.	IDMT	Both	rmc0146GB
673.	The BLM needs to review the Grazing Policy adopted by the Custer County Commissioners prior to any actions set forth in the Interim Management Policies or Procedures, and the implementation of any alternatives included in the NEPA document. In part this 'Grazing Policy' states that " .. the preservation of historic and customary agricultural use is important to the citizens of Custer County and with much of the economy derived from agriculture and related activities, maintaining viable tracts of agricultural and rangeland is a County goal;"	IDMT	Both	rmc0146GB
674.	NOW, THEREFORE BE IT RESOLVED that it is the interim policy of the Custer County Commissioners do not support the lowering of allotments or individual permittee's livestock numbers and/or season of use because of any declaration of critical habitat;"	IDMT	Both	rmc0146GB
675.	BE IT FURTHER RESOLVED that any and all activities In regard to such changes in numbers and/or season of use must be coordinated with the Custer County Commissioners as mandated by FLMPA of 1976 and other Acts and Regulations."	IDMT	Both	rmc0146GB
676.	Northeast Montana provides year-round habitat for large numbers of sage grouse. The bird thrives in this region because of the abundance of rangeland that has been conserved since the BLM and ranches began the partnership initiated by the Taylor Grazing Act. As this region comes under the scrutiny of anti-grazing groups, much political effort is expended in attempts to remove ranches that have been part of the rangeland ecosystem for a hundred years. The Resource Management Plans and the Environmental Impact Statements need to recognize that threats to these ranches are also threats to the rangeland ecosystem, and thus are threats to the species of the ecosystem, including the sage grouse. Only by preserving on-the ground partners in rangeland conservation can the Department of the Interior fulfill its obligation to preserve rangeland species.	MT-RM	BLM	emc0013RM

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677.	Those who remember the 1930's in northeast Montana can recall dust bowl conditions in which livestock foraged by pawing the bare ground to expose roots they could eat. Those who remember the 1950's tell of acres or even sections of hardpan flats, overgrazed by feral horse herds, on which only cactus would grow. Today, northeast Montana is recognized as the largest, best, most intact prairie ecosystem in the world. What brought about this remarkable recovery? 1. The Taylor Grazing Act ended homesteading and protected rangeland from the plow. 2. The ensuing range adjudication and fencing eliminated non-local herds. 3. The BLM and the ranches worked to find sustainable stocking rates.	MT-RM	Both	emc0013RM
678.	This region is great sage grouse habitat because the BLM and the local ranches have worked together to make it that way. A successful sage grouse conservation strategy will recognize the successes of the partnership between local ranches and the BLM. It will build on those successes by making the partnership stronger.	MT-RM	BLM	emc0013RM
679.	A ranch is often portrayed as a commercial enterprise. Yet in rural communities, most ranches function more like a household than a business. Some federal land managers view ranches -or at least their grazing -as a management tool. To the prairie, however, a ranch is a component of the ecosystem. Losing a ranch can be as harmful to the prairie as losing an elk herd, losing a wolf pack, losing a beaver population, or climate change.	MT-RM	Both	emc0013RM
680.	In partnership with the BLM, ranches in northeast Montana have turned a dust bowl into thriving grassland. Of all federal agencies, only the BLM understands the value of grazing to a prairie ecosystem. By working with ranches on water and fencing projects, the BLM continues to improve the health of this rangeland. Management of the prairie's dominant herbivore is the most obvious contribution ranches make to the prairie ecosystem, but there are many others.	MT-RM	BLM	emc0013RM
681.	The Taylor Grazing Act protected the BLM lands from the plow, but it is the partnership with the BLM that protects private lands from the plow. Many pastures include private and BLM rangeland within the same fence.	MT-RM	Both	emc0013RM
682.	The rancher's love of the land is the only thing protecting private land in northeast Montana from the development that has harmed sage grouse elsewhere.	MT-RM	Both	emc0013RM
683.	The history of the Northern Plains Resource Council shows that some farmers and ranchers are even willing to protect their land from energy development. If the oil boom is the greatest threat to sage grouse, then anything that encourages ranches to sell out must also be acknowledged as a threat.	MT-RM	Both	emc0013RM
684.	Although fire disturbance can have positive effects on some prairie species, it should be noted that big sage brush is incredibly slow to recover from fire, which means a wildfire can eliminate sage grouse habitat and forage for decades. Ranchers and ranching communities provide a look-out and first-response system that absentee owners do not. The BLM and the counties have historically done a very good job of partnering with the local ranches to keep summer wildfires controlled. Furthermore, grazing is effective at fire prevention.	MT-RM	Both	emc0013RM
685.	In a cottonwood grove survey of the upper Missouri River, Kudray et al. (2004) compared cattle-inaccessible river islands with accessible cottonwood groves on similar sites. They found no correlation between accessibility and any of their ecological measures. In other words, their analysis of the data supports the hypothesis that current grazing practices have no effect on riparian vegetation. The study devotes many paragraphs to the hypothesis that cattle are responsible for a decline of red-osier dogwood and	MT-RM	Both	emc0013RM

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	chokecherry along the Missouri River. Because the study measured these species only once, it is not possible for it to reveal whether these species are increasing or declining. Furthermore, the experiment that was performed indicated that cattle did no harm. Why did the authors devote paragraphs to this hypothesis but only one sentence to the actual results of their experiment? Because they were trained to believe that cattle harm riparian ecosystems. A more careful analysis of the data might have noted that all the cattle-inaccessible river islands had 90% non-native herb cover, while some of the cattle-accessible sites were much better. But the idea that cattle could be benefiting native plants apparently did not occur to these researchers.			
686.	Several ranches in the Fort Peck Lake watershed participated in a riparian enhancement and repair project. We were given forms to monitor the health of the riparian area. These forms include an estimate of trailing and bare ground due to livestock. On our ranch, these sites have scattered deer droppings, deer beds, and deer tracks. One site is visited by elk on their way to graze the neighbor's alfalfa field. How are we to tell what percentage of trailing is caused by cattle and what percentage is caused by wildlife? The answer to this evaluation question reveals only the biases of the researcher.	MT-RM	Both	emc0013RM
687.	There is a sagegrouse dancing ground not quite a mile from the ranch house. Sage-grouse numbers cycle, but this ground has plenty of sagegrouse even in years when they are not so numerous. There are two factors that make this place preferred by sagegrouse compared to the surrounding countryside. In the 1920s, my great grandfather installed a stock dam here. To this day it still provides good livestock water, but it is also very popular with waterfowl and sagegrouse. Even in drought years, when the grouse that have chosen other areas have to move or die of thirst, this reservoir offers a dependable drink, and they know it. Secondly, this dancing ground is quite near the livestock corrals. Short bursts of heavy use periodically through the year have managed to keep this area with the proper combination of bare ground and sagebrush that create the kind of dancing ground sagegrouse like. This spot is the nucleus of our sagegrouse populations. When times are good, rains are frequent and predators are few, they expand out from it, but when the wind turns dry and coyote and eagle numbers soar, then they survive here, waiting for good times to return.	MT-RM	Both	emc0023RM
688.	There is no evidence that cattle have any impact on sagegrouse, either positive or negative. However, there is plenty of evidence that ranching has a strong positive impact on sagegrouse. Ranches need to be relatively large and usually in native vegetation. This protects against habitat fragmentation and the destruction of sagebrush for fields or lawns. Ranchers need vegetation and will control fires to some extent. Hot, late, uncontrolled fires will destroy large areas of big sagebrush, which takes over a century to recover from a burn of this kind. Ranches tend to have some degree of predator control, and predators are the largest negative impact on sagegrouse, following sagebrush destruction. Areas with healthy sagegrouse populations tend to have ranches, areas that have lost their ranches have also lost their sagegrouse. It is easy and popular to protect sagegrouse from cattle, but the cattle don't harm the sagegrouse. If you remove the cattle, you also remove the ranches, which are important to the sagegrouse. Sagegrouse can be protected into extinction just like rare orchids and desert pupfish.	MT-RM	Both	emc0023RM
689.	About thirty years ago BLM sent a questionnaire to Southeastern Montana area lenders seeking comments on a possible	MT-RM	BLM	emc0082RM

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	increase in BLM grazing costs. I recommended a considerable increase but a cost still well below better private land leases due to range quality, water, and fencing. I later visited with several banks and Farm Credit Services and universally found that they shared the same belief, although they would never admit it to their rancher clients. Some years later I was asked whether a proposed increase in grazing costs would pose a serious hardship to any rancher clients. After reviewing various loan files, I determined that BLM grazing cost increases would represent a very minor portion of total operating costs and would not be significant in determining success or failure of any of those operations. In neither instance were grazing costs raised. When long overdue fee increases happen, a portion of the additional income should be tied to use for improvements in fencing and water, not to graze out the last untouched corners of pastures, but instead to be used strictly for wildlife habitat improvement on lands which are to repeat again, owned by the public.			
690.	Our members have proven that livestock grazing contributes positively to wildlife habitat and is especially compatible and beneficial to greater sage-grouse habitat conservation. Ranchers are the stewards of the greater sage-grouse habitat on both the private and public land, amounting to 27 million acres in Montana. Without ranchers, who provide an effective line of defense against fire and noxious weeds, who manage forage for optimum production, and who are the primary protectors of open space in the private lands of the west, large areas of greater sage-grouse habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified threats to greater sage-grouse habitat, including wildfire, invasive plants, and urbanization and development. The ranching community is also the most cost effective means to provide these benefits.	MT-RM	Both	emc0157RM
691.	In Montana, it is important to point out that the sage grouse population is thriving. Because of the stable population, our members do not support reductions of livestock on federal lands as a means to conserve sage grouse. Livestock grazing is proven to be a benefit to sage grouse, as stated in the Montana Sage Grouse Management Plan. Our organizations support more proactive measures to conserve sage grouse, such as support for local working groups and the NRCS Sage Grouse Initiative. These types of efforts will have a much more favorable collaboration of community members working toward maintaining and improving communities and wildlife habitat. These types of efforts should be used as a model in other programs or as a pilot program in the development of the upcoming Farm Bill. Simply reducing livestock grazing on federal lands will not benefit the ranching stewards of the land or the sage grouse. The unintended consequences of decisions that negatively impact our rancher members will also impact the greater sage-grouse, by encouraging the conversion of private rangelands into farmland, urban development, or other uses not conducive to greater sage-grouse habitat.	MT-RM	Both	emc0157RM
692.	Livestock grazing is compatible and beneficial to greater sage-grouse habitat conservation. This has been proven by independent, peer-reviewed scientific analysis, much of which was conducted in our own state. Ranchers are the stewards of the greater sage-grouse habitat on both the private and public range lands. Allowing ranchers the continued use of public lands without unnecessary restrictions due to the potential listing of a species with such a large habitat encourages stewardship and prevents fragmentation through development. It is imperative that a stable economic environment be sustained and enhanced so that our members may assist in the conservation of rangeland for the greater sage-grouse.	MT-RM	Both	emc0157RM
693.	In Montana, it is important to point out that the sage grouse population is thriving. Because of the stable population, our county does not support reductions of livestock on federal lands as a means to conserve sage grouse. Livestock grazing is proven to be a benefit to sage grouse, as stated in the Montana Sage Management Plan. Our county supports more proactive	MT-RM	Both	rmc0023RM

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	measures to conserve sage grouse, such as support for local working groups and the NRCS Sage Grouse Initiative. These types of efforts will have a much more favorable colaboration of community members working toward improving communities and wildlife habitat.			
694.	In conclusion, Judith Basin County believes ranching and farming are the most efficient and cost effective means to sustain wildlife populations, while also producing food and fiber for our nation. It is important that conservation activities work hand-in hand with agriculture, because negative impacts on ranching will have negative impacts on sage grouse. Our county recommends that your agency continues to enact or develop strategies that will benefit both agriculture and the sage grouse population.	MT-RM	Both	rmc0023RM
695.	The Little Missouri Grazing Association (LMGA) has taken a pro active approach towards the sage-grouse. We have two years of habitat monitoring data collected. We also have data showing historical grazing use showing that the stocking rates have not changed in many years. The land use practices have not changed. We have no oil & gas impact and no industrial encroachment.	ND	Both	emc0039RM
696.	Let the ranchers graze there herds on there allotments, keep hunters off the land. We have million acres of land in Nevada that is not owed by the public. Let them hunt there.	NVCA	Both	emc0012GB
697.	The County supports a "No Net Loss of Grazing AUMs" policy. That being said, we request more detailed information in terms of potential impacts to grazing operations and allotments within the County. We encourage working collaboratively with grazing permittees to examine methods of grazing which benefit and enhance Sage-grouse habitat. We are adamantly opposed to regulations that encourage closure and economically infeasible restrictions on existing operators. Closure or retirements of allotments removes a key management option for proper rangeland and habitat management, and will have a profound economic impact to this County.	NVCA	Both	emc0130GB
698.	If we get the livestock industry back on the range like they were in the 50's 60's and 70's we will not only have fewer wildfires but a larger big game population as well.	NVCA	Both	emc0187GB
699.	I am extremely concerned about the impact the above referenced Notice of Intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities.	NVCA	Both	emc0202GB
700.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations and local rural economies.	NVCA	Both	emc0202GB
701.	The last thing the State of Nevada and our local BlM district offices need is a "directive" from Washington, DC. We need to promote grazing as one of the longest standing tools in keeping wild land fires in check and in generating and maintaining viable sage-grouse habitat.	NVCA	Both	emc0213GB
702.	I am extremely concerned about the impact that the above referenced notice of intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities.	NVCA	Both	emc0215GB
703.	Buckhorn Land and Livestock, LLC owns the Winnemucca Ranch and has a Grazing allotment located in the Virginia Range in Nevada. We have owned the ranch and operated the Winnemucca Ranch allotment since 2005. When we purchased the	NVCA	Both	emc0232GB

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	ranch in 2005 we noticed a declined population of the sage-grouse within our allotment. However, since 2005 we have noticed increased number of sage-grouse on the range over the seven year period we have owned the ranch while at the same time ran cattle on this same allotment, Thru our grazing practices we don't allow our cattle to camp on riparian areas as we believe in keeping our herds moving thru the range.			
704.	We have noted that livestock grazing was identified as a moderate risk to sage-grouse in the Virginia range conservation plan yet the best available science as reported by Pete Coates does not support this risk assessment	NVCA	Both	emc0232GB
705.	The Nevada Wilderness Project respectfully requests that you address the impacts to sage-grouse and sage-grouse habitat caused by feral horses, including removal of vegetational cover necessary for nesting and brood-rearing, changes to vegetational composition that results from feral horse use, horse impacts to springs and other important free water sources utilized by sage-grouse, possible disturbance caused by feral horses during the nesting period, infrastructure used to mitigate horse impacts (e.g., fences) and how it may negatively affect sage-grouse, any connection to West Nile Virus as that disease is recognized as affecting both horses and sage-grouse, and the potential for feral horse management actions to negatively affect sage-grouse and sage-grouse habitat.	NVCA	Both	emc0243GB
706.	Interestingly, Barrick's ranches may provide unique opportunities for mitigation of impacts from its mining operations. As operating ranches, these off-site restoration opportunities, including restoration of habitat on fee land, would likely be unavailable without their connection to the mining operations. Creating new riparian vegetation or wetlands to mitigate for potentially impacted wetlands, improving degraded habitats to replace impacted areas, and developing water sources when access to water is prevented due to safety fencing are just a few examples of off-site mitigation that potentially could be available on Barrick's ranch lands.	NVCA	Both	emc0277GB
707.	Range management: Poorly managed grazing by domestic livestock, wild horses and burros (rarely wildlife), range improvements and vegetation forage projects have contributed to the loss, degradation, and fragmentation of Sage Grouse habitats, according to the USFWS listing decision. The agencies' current regulatory authorities in the grazing programs have not prevented this damage. Some agency managers and others believe that grazing, properly managed, can be a tool for improving Sage Grouse habitats, but there is little recent scientific research supporting these beliefs or agreement on what "proper grazing management" is or can be. It is very important for the EIS to include conservation measures which both improve grazing management to benefit, not continue to harm, Sage Grouse and priority habitats, but also to add regulatory authority for agencies to encourage grazing which results in healthy rangelands and healthy Sage Grouse populations and habitats, but also to curtail grazing practices which are not meeting standards and guidelines for healthy rangelands, including meeting Sage Grouse habitat requirements. At a minimum, we suggest the following measures be included in the EIS. a. the agencies should continue existing range management where Sage Grouse priority habitats are in excellent condition (meeting vegetation and structural requirements for Sage Grouse). b. the agencies should develop and implement financial and other incentives for grazing which meets or exceeds standards and guidelines for healthy rangelands, including Sage Grouse habitat requirements. c. the agencies must examine standards and guidelines for rangeland health for their adequacy in protecting Sage Grouse and priority habitats and change, if necessary, including providing sufficient vegetative cover for nesting and riparian and wet	NVCA	Both	emc0283GB

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	meadow habitat for brood-rearing, and seasonal requirements, with priority given to allotments with a greater percent of acreage in priority habitats. d. the agencies must change AMPs and permit terms and conditions in all allotments not meeting standards and guidelines, including those where "progress" is unsatisfactory, adding specific vegetation objectives and restrictions on livestock and wild horses and burros numbers, timing and seasons of use, rest rotation, and other necessary provisions. e. the agencies should include require habitat protection measures for Sage Grouse habitats in drought restrictions on grazing uses. f. the agencies should approve not proposed water developments unless benefits to Sage-Grouse (increased availability of water) outweigh costs (including damages to natural springs, seeps and wet meadows from structures and dewatering and concentration of livestock and wild horses and burros as well as the increased potential for water developments to support mosquitoes which spread West Nile virus. g. the agencies should evaluate and modify water developments in priority habitats in order to meet Sage Grouse habitat requirements. h. the agencies should prohibit vegetation treatments in priority habitats which don't benefit Sage-Grouse. i. the agencies should modify crested wheat grass seedings if necessary for restoration of Sage-Grouse habitat. j. the agencies should design range improvements to conserve, enhance, and restore Sage-Grouse habitat. k. the agencies should evaluate existing range improvements and modify to meet specific Sage-Grouse habitat requirements, including removal or modification of fences close to leks and treatment of invasive weeds associated with fences and other structures. l. the agencies should prohibit livestock grazing of burned areas until vegetation recovery objectives have been met. m. the agencies should identify allotments where permanent retirement of grazing is more beneficial than costly to Sage Grouse, including the risk of making unused stock water and ranching water rights available for interbasin transfers.			
708.	Grasses Dominate the Revegetated Area and are used Extensively for Grazing: Due to the predominance of grass species in the BLM-approved reclamation seed mix used to revegetate the mine site, grass is the dominant plant species growing on the reclaimed areas. These areas are highly utilized for grazing by cattle, horses and antelope. In addition, the private sections cover water sources and pasture lands heavily impacted by these larger animals. Large areas of cheat grass are locally present, as well.	NVCA	Both	emc0287GB
709.	In the NTT document, livestock grazing is considered to be a diffuse disturbance (pressure is exerted over broad spatial or temporal scales). Livestock grazing, as well as wild horse and burro activity can greatly affect nest success on any ground-nesting bird as well as decimate any viable vegetation in the grazing area. Wild horse numbers have increased exponentially in the Rochester area and no gatherings have occurred to decrease population size. Since wild horses have different grazing patterns then cattle the magnitude of grazing increases across the entire landscape in the Rochester area. Damage to vegetation communities (i.e. reduction of grass, shrub, and forb cover and increases in unpalatable forbs and exotic plants as well as complete decimation of any vegetation community) is highly visible in the Limerick and Rochester canyon areas. If any mitigation efforts were made in or adjacent to Rochester mine's project area wild horses and cattle would have to be fenced out for any type of habitat restoration or sage grouse re-introduction to have a chance.	NVCA	Both	emc0302GB

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710.	In the NTT document, livestock grazing is considered to be a diffuse disturbance (pressure is exerted over broad spatial or temporal scales). Livestock grazing, as well as wild horse and burro activity can greatly affect nest success on any ground-nesting bird as well as decimate any viable vegetation in the grazing area. Wild horse numbers have increased exponentially in the Rochester area and no gatherings have occurred to decrease population size. Since wild horses have different grazing patterns then cattle the magnitude of grazing increases across the entire landscape in the Rochester area. Damage to vegetation communities (i.e. reduction of grass, shrub, and forb cover and increases in unpalatable forbs and exotic plants as well as complete decimation of any vegetation community) is highly visible in the Limerick and Rochester canyon areas. If any mitigation efforts were made in or adjacent to Rochester mine's project area wild horses and cattle would have to be fenced out for any type of habitat restoration or sage grouse re-introduction to have a chance.	NVCA	Both	emc0302GB
711.	Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities. The conservation of rangelands for livestock production is extremely important, not onlj' to the sustainable production offood and fiber for the United States and worldwide market.	NVCA	Both	emc0304GB
712.	But also to providing quality habitat to support wildlife populations. Scientific research indicates that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife.	NVCA	Both	emc0304GB
713.	Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species.	NVCA	Both	emc0304GB
714.	NEPA analysis should start from the premise that properly managed grazing can be a benefit to sage-grouse and properly managed grazing should be incorporated into the sage-grouse management strategy.	NVCA	Both	emc0304GB
715.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	NVCA	Both	emc0304GB
716.	Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations.	NVCA	Both	emc0304GB
717.	There are some specific concerns that the Association has regarding the main threats to the greater sage-grouse. According to the US Fish and Wildlife Service (USFWS), the five greatest threats to greater sage-grouse in the West are invasive species, infrastructure, wildfire, agriculture and grazing respectively. The Association understands that these threats are analyzed to assess the impacts to the general rangeland health needed to sustain a healthy, thriving population of greater sage-grouse and their habitat. Because ranchers serve as stewards of the range and especially in Nevada, we feel it is important to observe the benefits of livestock grazing in relation to habitat health and stable populations of greater sage-grouse. According to Natural Resources Conservation Service (NRCS), grazing "has been responsible for retaining expansive tracts of sagebrush-dominated rangeland from conversion to cropland" and can "stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition." Grazing on public and private rangelands in Nevada has occurred for about 150 years and as such, has co-existed with sage-grouse populations. As recognized by the NRCS, grazing has and can be very beneficial to the health of the range, specifically sagebrush	NVCA	Both	emc0328GB

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	communities. The Association believes that livestock grazing can be used as a beneficial mitigation measure to enhance habitat conservation and sustain viable greater sage-grouse populations and encourages the BLM to consider mitigation measures that use livestock grazing.			
718.	Managed livestock grazing to maintain residual cover of herbaceous vegetation so as to reduce predation during nesting may be the most beneficial for sage grouse populations (Beck and Mitchell 2000, Aldridge and Brigham 2003.) This does not clearly state what residual cover of herbaceous vegetation is. Furthermore, residual cover will vary across landscapes and the sagebrush ecosystem and should be approached as such.	NVCA	Both	emc0328GB
719.	If an effective grazing system that meets sage-grouse habitat requirements is not already in place, analyze at least one alternative that conserves, restores or enhances sage-grouse habitat in the NEPA document prepared for the permit renewal (Doherty et al. 2011b, Williams et al. 2011). Coordination of the specialists within the agencies should already ensure that an effective grazing system is in place that supports the resources per the NEPA process. Further clarification is not needed if regulations within the agencies are followed.	NVCA	Both	emc0328GB
720.	Maintain retirement of grazing privileges as an option in priority sage-grouse areas when base property is transferred or the current permittee is willing to retire grazing on all or part of an allotment. Analyze the adverse impacts of no livestock use on wildfire and invasive species threats (Crawford et al. 2004) in evaluating retirement proposals. - Planning direction Note: Each planning effort will identify the specific allotment(s) where permanent retirement of grazing privileges is potentially beneficial. Retirement of grazing privileges should not be an option. This is an existing right and, per 76 FR 77008-77011, "the RMP and LMP amendments/revisions will recognize valid existing rights." Furthermore, as the Association has already stated, cattle grazing management techniques can be used to address wildfire and invasive species threats.	NVCA	Both	emc0328GB
721.	I am writing this letter in protest to any removal of livestock from the range here in Lincoln County Nevada.	NVCA	Both	emc0389GB
722.	My feeling towards the sage grouse populations in Lincoln Co. are different from other county's populations, biologist in our area have always maintained that the area is a fringe of sage grouse habitat and that livestock grazing is beneficial to the sage grouse habitat.	NVCA	Both	emc0389GB
723.	We are extremely concerned about the impact the above referenced Notice of Intent will have on the range livestock industry in Nevada.	NVCA	Both	emc0390GB
724.	The Forest Service has three categories of grazing allotments. Open, Closed, Vacant. The HT Scoping Notice for the next Rangeland EIS in line, Austin-Tonopah, proposes to fling Open several Vacant allotments in Monitor-Toiyabe lands where sage-grouse on the southern margin of the species range are present on leks in reasonable numbers. Grazing disturbance has serendipitously been absent for around a decade or longer in some areas. The reason is that grazing permits were canceled due to Sagebrush Rebel livestock trespass and other transgressions, and also large areas of rugged terrain. So here we have an anomaly a fairly stable sage-grouse population with reasonable numbers of birds on leks at the southern margin of the species' range that is persisting– rather than dwindling out. It is critical that agencies examine the lessened grazing pressure here, as well as in Hart Mountain and Sheldon where there is no domestic livestock grazing. It highlights the adverse impacts	NVCA	F	emc0411GB

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	of grazing disturbance in arid sagebrush habitats. This Monitor-Toiyabe landscape has also suffered relatively little sagebrush and tree killing treatment disturbance. This area is one of the ACECs that WWP is proposing in this EIS Process.			
725.	BLM must amend all Land Use Plans including those underway. Plans currently in process have very weak goals, objectives, and uncertain non-mandatory language. Plus they greatly avoid addressing livestock disturbance, removing grazing from lands where there is risk of weed invasion or sagegrouse loss, and otherwise are inadequate. Example: Winnemucca DRMP/DEIS, and the potentially aborted Bruneau RMP.	NVCA	BLM	emc0411GB
726.	WWP requests that the Forest Service incorporate into this Sage-grouse EIS process the Humboldt- Toiyabe Rangeland EIS's, the Biological Assessments that rubberstamped the near-status quo grazing actions and continued stocking levels and harmful facilities and use periods - and the full administrative record. They serve to illustrate the depths to which agencies stoop to paper over grazing disturbance impacts. We incorporate these documents and the accompanying administrative records by reference into these comments to illustrate the degree of significant changes that must be made across Forest Regions where Plans are being amended. Analysis of the full spectrum of harms from livestock grazing, not general discussions of "herbivory" must drive this process. In all of these processes, there was no effort made to address stocking rates, and AUMs/HMs were carried forward at levels that greatly exceeded actual use. Any reductions in livestock were to be left to following years, out of the public eye in closed door meetings with ranchers	NVCA	USFS	emc0411GB
727.	We request that as part of this current sage-grouse process, decision makers review the HT Forest EISs, the agency e-mails shoving aside concerns for sage-grouse, the woefully inadequate and biased Forest BAs tailored only to support whatever grazing outcome the range staff described – which was keeping as many AUMs on the books as possible – no matter how many new fences, sagebrush destruction projects, and the additional ever-expanding harmful de-watering spring developments and pipelines and trough systems that might require as a laundry list of disjointed BMPs and "tools" was to be applied in the future. Plus these documents never analyzed alternatives that seriously looked at conserving habitats, removing livestock developments, and de-stocking or greatly reducing stocking while applying much more conservative standards of use in any areas where livestock grazing might continue. Analysis of the No Grazing alternative was minimal, and biased. The Forest refused to conduct an honest Capability and Suitability analysis – to determine if Forest lands were Capable of supporting livestock use, and then if those lands, even if found Capable (factoring in forage production, slope, distance from water, topographic factors, fragile/erodible soils, forested vegetation, and a combination of all of these), were really suitable for continued grazing. Then, on lands that might meet these capability criteria, the suitability of continued grazing use was to have been determined while fully considering all other watershed, wildlife, wilderness, roadless area, recreational values. Given the values of these attributes to the public and the conflicts of livestock with all of these – are Forest lands, watersheds and wildlife really suitable for continued grazing use? The Forest merely defaulted to its 1986 finding, where less than 1% of the half million acres project area had been found not to be suitable for grazing use.	NVCA	USFS	emc0411GB
728.	The Forest has failed to conduct current honest capability and suitability analyses. Instead, as in the Ely Westside EIS, claimed that areas of steep, rugged, limestone outcropping topography in the pinyon-juniper zone were "capable" of supporting livestock – in defiance of reality. Such claims, never really explained, could only be based on the hopes of deforesting the lands someday. But even if the lands were deforested and desertified and made vulnerable to weed infestation – the combination of slope, rocks/cliffs and other topographic features would make it impossible to graze livestock. This also	NVCA	Both	emc0411GB

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	highlights the lack of benefit of many proposed and completed deforestation projects that the agencies are claiming would somehow benefit sage-grouse. Sage-grouse don't use steep, rugged slopes – no matter how many trees the forest burns or masticates. The Forest, in all of these EIS processes, instead of conducting a valid current analysis, simply claimed that the old Forest Plan from 1986 adequately dealt with Suitability. So of the over half a million acres of the Ely Westside lands, all but three thousand or so acres (tiny campgrounds and RNAs) were all found to be suitable for continued livestock grazing disturbance. The half million acre affected lands include the habitat of the vanishing Quinn PMU as well as the White Pine PMU where some leks still persist, including in portions of the even the 2010 Doherty Core-mapped areas. Thus, even where grouse are in serious trouble (Quinn) or a population still has some birds but is declining like White Pine and threatened by expanding mining, and new powerline development (SWIP), agencies refused to take needs of sage-grouse into account.			
729.	Page 2 lists Threats. This list includes reductions in habitat quantity and/or quality and other degradation but the word livestock or grazing as a causal factor is not even mentioned. Nor is livestock disturbance of lek and nesting and wintering habitats. Nor the adverse impacts of livestock in lowering nest success, and increasing predators particularly mesopredators. Nor are fences as causes of mortality yet collisions with powerlines and vehicles is listed. West Nile virus and livestock water developments such as stock ponds, troughs, pipelines, and highly degraded trampled stream margins are also ignored.	NVCA	Both	emc0411GB
730.	We are also concerned about targeting pinyon-juniper without an understanding of historical deforestation, and the fact that in many areas, pinyon-juniper are in reality the climax vegetation on a site. It appears much easier for agencies to promote expensive tree killing projects, rather than address the extensive degradation caused by livestock grazing, roading, or other disturbances throughout Nevada's sagebrush habitats.	NVCA	Both	emc0411GB
731.	How did NDOW and BLM determine that habitats of moderate importance were not at potential? We are very concerned that agencies are writing off habitats with significant livestock degradation without considering alternatives such as removal of livestock so that passive restoration can occur. R-1, R-2, R-3 habitats could be included here. How was each decision made?	NVCA	Both	emc0411GB
732.	We have observed that well-rnanaged livestock grazing is an effective and sustairrable method for combating several of the most significant threats to sage grouse habitat including fuels reduction to mirrimize wild fires and to prevent or rlow invasive species and conifer proliferation. While the ESA does not provide for the cost of a mitigation strategy to preclude its implementation, funding to implement strategie,s is none the less rraturally limited. Our continued ability to serve a broad spectrum of multiple-use industries is crucial to maintaining their ability to provide beneficial habitat managerflent and their financial viability to implement appropriate mitigation ffieasure5. Mininrizing wild fires also protects our infrastructure from damage and reduces our need to mobilize drews and equipment to rehuild power lines irt areas which may be sage grouse habitat.	NVCA	Both	fxc0006GB
733.	Grazing is alleged to be a detractor for sage grouse habitat. We have found that proper grazing management can improve habitat for all wildlife, including sage grouse. Proper livestock grazing allows residual growth to be managed at sustainable levels based on annual precipitation, site potential, and species composition	NVCA	Both	fxc0010GB
734.	Although livestock can be found on a majority of public lands, grazing shouldn't be prohibitive to sage grouse health. The people that see sage grouse on a day~to-day basis are our western ranchers. No one else spends the amount of time as	NVCA	Both	fxc0010GB

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	ranchers out on public lands- It is ridiculous to assume that grazing is more harmful to sage grouse because It occurs on more acres than energy or mineral development. Sage grouse and cattle can co-exist. Sage grouse cannot, however, live on a gravel road or well pad.			
735.	Grazing is alleged to be a detractor for sage grouse habitat. We have found that proper grazing management can improve habitat for all wildlife, including sage grouse. Proper livestock grazing allows residual growth to be managed at sustainable levels based on annual precipitation, site potential, and species composition.	NVCA	Both	fxc0010GB
736.	Although livestock can be found on a majority of public lands, grazing shouldn't be prohibitive to sage grouse health. The people that see sage grouse on a day~to-day basis are our western ranchers. No one else spends the amount of time as ranchers out on public lands- It is ridiculous to assume that grazing is more harmful to sage grouse because It occurs on more acres than energy or mineral development. Sage grouse and cattle can co-exist. Sage grouse cannot, however, live on a gravel road or well pad.	NVCA	Both	fxc0010gb
737.	Is livestock grazing one of the causes for the decline of sage grouse? Or is the large decrease in livestock numbers since the 1980's to 2011 one of the causes tor the decline in sage grouse?	NVCA	Both	fxc0014GB
738.	The BLM's, IM goes into extensive detail on how livestock grazing has to he changed in order to help the Sage Grouse. No studies were presented to show how this is going to help the Sage Grouse and how many birds it will produce or even hope to produce. Nevada is different then most states in that the BLM and the Forest Service manage land use plans for over 85% of the land. In 74 years, the BLM has not been able to maintain a steady population of Sage Grouse. Granted their main focus has not been the Sage Grouse, but why does the BLM and the USFS think that doing more of the same thing like manipulating the current Land Use Plans is going to produce a different result? We have read a lot of assumptions and theories, but no hard facts. From 1982 through 2011, Nevada had a reduction of 230,000 head of cattle as well as a reduction of 59,000 head of sheep. In this same time period there has been an increase in regulation for livestock grazing on public lands i.e. "timing, location and intensity" (as stated in the National Greater Sage-Grouse Conservation Measures report). Shawn Espinoza of NDOW showed sage grouse numbers from 1975-2011. There has been a cycle of ups and downs, but there is no evidence that the regulations imposed by the BLM or USFS had any effect on these cycles. It is wrong to focus on only one factor especially if it is only because, "enhance management of livestock grazing may be the most cost-effective opportunity in many instances to improve Greater Sage-Grouse habitat on public lands." (BLM Instruction Memorandum 12-27-2011) Again, if heavily regulated livestock management is supposed to benefit the Greater Sage-Grouse, then why haven't the last 30 years plus of heavily regulated livestock management from the BLM and USFS steadily increased sage hen numbers?	NVCA	Both	fxc0014GB
739.	Since the tum of the century the area has been grazed by cattle and wild horses and burros. The wild horse and burro population got out of control in the 80's and 90's but by that time most of the sage hen were gone.	NVCA	Both	rmc0044GB
740.	Infrastructure is listed as the second largest threat. What is included in infrastructure? Is this just pasture fences and water development? We need clarification.	NVCA	Both	rmc0064GB
741.	The table lists grazing as the 5th largest threat to Sage Grouse. Does this include moderate rest rotation grazing? If so, we wonder how this could be? In fact we feel like moderate grazing could be a huge benefit to the Sage Grouse and their habitat for the following reasons. - Moderate grazing of pastures results in decreased fine fuel available as an ignition source for wildfire. - Moderate grazing by livestock on pastures in early spring or summer can provide a break in fuel load that will	NVCA	Both	rmc0064GB

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	sometimes stop a wildfire or effectively slow it down so fire crews can contain it. Scott Sayer, BLM Range Specialist from the Burley District, has pictures taken recently on the Burley District that supports this concept. - Moderately grazed ranges that are burned over by wildfire recover from the burn sooner and easier, than non-grazed ranges, due to cooler burn temperatures. The crowns of perennial grass plants sustain less damage from the cooler fire. - Up until 1958, BLM documents show permitted cattle on Jim Sage being twice as many as they are now, plus a band of sheep. Most local residents agree there were several times more Sage Grouse than there are now. Two senior livestock operators of the 1960's era, Bob Ward and Dale Pierce, remember seeing large wintering flocks of Sage Grouse near Lower Kane Springs Canyon. "When they flew up they were too numerous to count." How could all of these birds have thrived on Jim Sage when permitted grazing was double what it is now? It is the resolute conclusion of the Jim Sage Grazing Association permittees, that grazing by livestock could very well be a benefit rather than a threat to the Sage Grouse and their habitat due to reasons expressed above. We would like to draw your attention to a Declaration by Karen Launchbaugh. It was recently submitted on behalf of the State of Idaho, in response to the remedies sought by Plaintiff Western Watersheds Project in connection with the Craters of the Moon National Monument Resource Management Plan and associated environmental impact statements. Ms. Launchbaugh is a professor of Rangeland Ecology, and the Director of the Rangeland Center for the University of Idaho. Her Declaration supports our list of reasons why livestock grazing benefits Sage Grouse and their habitat.			
742.	I am extremely concerned about the impact the above referenced Notice of Intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities. The conservation of rangelands for livestock production is extremely important, not only to the sustainable production of food and fiber for the United States and worldwide markets, but also to providing quality habitat to support wildlife populations. Scientific research indicates that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife. Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant specles.	NVCA	Both	rmc0065GB
743.	With regards to livestock grazing, I have often observed sage-grouse in our mountain meadows which have been recently grazed by cattle. As noted by the biologist referred to above, there seems to be a positive relationship between cattle grazing and sage-grouse. Assemblyman Hansen's article also refers to scientific studies which verify this positive relationship. (The Relationship of Cattle Grazing to Sage Grouse by Carol Evans).	NVCA	Both	rmc0065GB
744.	In summation, I strongly urge the agencies to recognize the benefits of livestock grazing to sagegrouse and to prioritize their focus on those issues that pose a real and specific threat to the Greater Sage Grouse and it's habitat. NEP A analysis should start from the premise that properly managed grazing can be a benefit to sage-grouse and properly managed grazing should be incorporated into the sage-grouse management strategy. I would also encourage the agencies involved to work together to arrive at a strategy for the entire ecosystem which includes both private and government lands. As a private landowner, I am prepared to work with the various agencies to enhance and improve the habitat for sage-grouse.	NVCA	Both	rmc0065GB
745.	SNWA respectfully requests that the EIS consider and discuss the following: the relationship between grazing operations and priority habitat, including effects of implementation of additional or revised greater sage-grouse conservation measures on operations of existing grazing allotments and under what circumstances	NVCA	Both	rmc0069GB

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	grazing permits can or cannot be renewed			
746.	The BLM/USFS are also reminded that the Oregon Cattlemen's Association (OCA) is working with Oregon BLM to develop a statewide Programmatic CCA for public lands beneficial to the sage-grouse. The cumulative benefit of these aforementioned local and statewide initiatives should substantially serve to lessen, if not eliminate, the need to ESA list the Greater Sage-Grouse within the State of Oregon.	OR	Both	emc0129GB
747.	The economic and social values of the local agri culture and ranching community in Malheur County are important considerations that must be studied and taken into account for the sage grouse EIS. Habitat protection areas for this species of bird should be carefull y studied to retain compatibility wilh the private landowner's business activities to avoid confli cts. Livestock and agriculture production are primary economic concerns in Malheur County and land management opportunities on federal and state lands must remain flexible (meet the needs of the community as well as sage grouse).	OR	Both	emc0136GB
748.	The cries about habitat loss are the most overrated and overused excuse for changes in land management since "crying wolf." Until such time disease and predation are addressed, no amount of habitat preservation or restoration will work. A perfect example of this is the Beaty Butte unit in the BLM's Oregon lakeview district. The unit does not have "threats" of habitat loss and fragmentation due to energy development and agricultural activities or livestock grazing. Livestock grazing is ten percent of what it was in the 1950s and 60s when sage grouse populations were high. Sage grouse populations began to decline as grazing and trapping were reduced. The loss of the Dept. of Agriculture predator control program had a major negative impact. The correlation of reduced grazing and predator control and a decline in sage grouse populations cannot be overlooked.	OR	Both	emc0139GB
749.	We are appalled at the generally poor condition of the public lands in Central Oregon. It would appear that the public lands have been overgrazed for so many years that there aren't many grasses or shrubs left to provide food and shelter for the grouse, antelope, or other native species. Wherever we hike, cheat grass is outcompeting the native grasses. Why? Because cheat grass sprouts early in the spring, and goes to seed by May or June. Guess when the cattle are set lose on the land? Not when the cheat grass is growing strong, but later in the year when the native bunch grasses are trying to put up seeds. The "management" practices of the high desert BLM land have been encouraging cheat grass and juniper growth, and therefore have upset the balance of all the native plants. The current practices continue to worsen the available fodder for the livestock set out to graze them. These practices have got to stop. You need to manage the BLM lands in a manner that can continue to sustain both the native plants and animals, which will also improve the grazing for livestock. You cannot continue to allow the cattle and sheep to graze the same sparse terrain every year. Give it a rest. Let the bunch grasses and native flowers go to seed for a couple of years before allowing the livestock back. Or change the time of year you allow grazing to March - April because there is plenty of cheat grass to eat. And they will eat it when it's green.	OR	Both	emc0152GB
750.	The report's author, ODFW sage-grouse lead Christian Hagen (also a member of the Sage-Grouse National Technical Team) made explicit in the Plan's executive summary that well-managed grazing is compatible with sage-grouse conservation, stating:	OR	Both	emc0221GB
751.	Any EIS or SEIS developed must also recognize the benefits of active farming and ranching operations to Sage-Grouse habitat/fln fact, extensive research has already been conducted by NRCS on the complimentary relationship between.	OR	Both	emc0221GB

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	Sage-grouse conservation and grazing. According to NRCS, "the same factors that negatively affect sage-grouse also negatively affect the health, productivity, and sustainability of native grazing lands. Therefore, improvements to benefit sage-grouse also benefit grazing lands and the ranchers that depend on them."			
752.	Conservation measures and practices recommended as an outcome of the BLM and USFS National Sage-Grouse Planning Strategy initiative are anticipated to be of interest and informative to the benefit of this Steering Committee as it develops a Programmatic CCAA, and the Steering Committee requests and seeks cooperative efforts and the sharing of this information in collaboration with our Oregon BLM Districts and USFS offices.	OR	Both	emc029GB
753.	Finally, OSGA encourages the agency to take into account the research by NRCS showing a complimentary relationship between sage-grouse conservation and grazing. The scientific research conducted by NRCS clearly shows that grazing can actually improve sage-grouse habitat. It is important for this research to be taken into consideration as the agency proceeds in developing an EIS and SEIS.	OR	Both	emc0309GB
754.	In summary, the best available scientific evidence shows that public grazing is important for sage-grouse conservation. In addition, public grazing maintains the economic sustainability of livestock producers and provides substantial economic benefits to the communities in which they live and the economy of Oregon as a whole. In turn, by maintaining the economic sustainability of livestock producers, public grazing protects sage-grouse habitat by reducing the need for ranchers to sell or develop their private property in a manner that is detrimental to sage-grouse habitat.	OR	Both	emc0309GB
755.	In the state of Oregon, a thorough strategy for sage-grouse conservation based on best available science has already been developed. In April 2011, the Oregon Department of Fish and Wildlife (ODFW) revised the state's Greater Sage-Grouse Conservation Assessment and Strategy (henceforth the "Plan"). In this report, guidance specifically tailored to conserving the sage-grouse populations in Oregon was developed with a view to maximizing the success of conservation efforts. The report's author, ODFW sage-grouse lead Christian Hagen (also a member of the Sage Grouse National Technical Team) made explicit in the Plan's executive summary that well-managed grazing is compatible with sage-grouse conservation, stating: This Plan recognizes that livestock ranching operations which manage for ecologically sustainable native rangelands is compatible with sage-grouse conservation, and necessary management activities to maintain a sustainable ranching operation are not considered "development actions" under the application of the Mitigation Policy to sage-grouse habitat. -Greater Sage-Grouse Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat, p. viii, April, 2011.	OR	Both	emc0315GB
756.	Economically viable ranching operations provide both stewardship of public lands and economic vitality to local and regional communities. The continuation of livestock production on Oregon's public lands is extremely important, not only for the sustainable production of food and fiber for the United States and worldwide markets, but also for the long-term success of sage-grouse conservation.	OR	Both	emc0315GB
757.	It is important to take in account the many things already being done in Oregon regarding sage-grouse conservation. In April 2011, the Oregon Department of Fish and Wildlife (ODFW) revised the state's Greater Sage-Grouse Conservation Assessment and Strategy. In this report, guidance specifically tailored to conserving the sage-grouse populations in Oregon was developed with a view to maximizing the success of conservation efforts. In that report it was stated that, "this plan recognizes that livestock ranching operations which manage for ecologically sustainable native rangelands is compatible with	OR	Both	emc0341GB

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	sage-grouse conservation." Given that the Oregon Plan has been very recently updated, amending land use plans in Oregon according to a different set of regulatory standards would not only represent a senseless waste of resources and local expertise, it would by necessity make sage-grouse conservation efforts in Oregon less appropriate and specific to sage-grouse populations and habitats in our state			
758.	The threats to sage-grouse habitat across the West are numerous.4 Here in Oregon, domestic livestock grazing has lead to the establishment and spread of weeds, erosion, denuded vegetation and associated lack of cover, pollution of water, and other impacts to sagebrush habitats. Projects that are necessary for continued domestic livestock grazing such as barbed-wire fencing provide predator perches and can pose a mortality threat for sage-grouse when flying grouse collide with the fencing, particularly around late brood rearing habitat such as springs, seeps and wet meadows.5 As well, the proliferation of non-native annual grasses such as cheatgrass and medusahead and other noxious weeds is spreading rapidly and replacing sagebrush. And, West Nile virus directly effects sage-grouse and causes mortality. This disease is spread through mosquito populations as they colonize wet areas on the landscape including livestock water developments.	OR	Both	emc0385GB
759.	Address Impacts of Grazing: The BLM must recognize effects of grazing on sage-grouse, including removal of cover, vegetation composition change, behavioral changes, and impacts from grazing-related infrastructure. Reduction of grazing impacts will necessarily include management changes quantified by conservation metrics tracked through reliable, enforced reporting and analysis.	OR	Both	emc0385GB
760.	Address Impacts of Fencing: Fences increase predator presence and cause direct sage-grouse mortality through collisions. BLM should remove unnecessary fences and limit new fencing in priority sage-grouse habitat, particularly in nesting and early brood-rearing habitat. BLM should also undertake mapping exercises to evaluate which existing fencelines might be appropriate for removal.	OR	Both	emc0385GB
761.	Livestock Grazing is today by far the largest area land use throughout eastern Oregon. Grazing activity at almost any intensity can be shown to product Invasive Weed problems that require use of Vegetation Treatments detrimental to Sage Grouse productivity.	OR	Both	rmc0036GB
762.	The ODFW EIS provides a blanket EXCLUSION to "...livestock grazing operations which manage for ecologically sustainable native rangelands is compatible with Sage Grouse conservation, and necessary management activities to maintain a sustainable ranching operation are not considered "development actions" under the application of the Mitigation Policy to Sage Grouse habitat." How many currently existing livestock grazing operations qualify for this exemption in Oregon and the various FS and BLM districts? What percentage of grazing lease holders will be exempt in eastern Oregon, and how many acres/amu's do they represent compared to non-exempt operations?	OR	Both	rmc0036GB
763.	Range management is also a primary use to be considered in ongoing land use planning and sage-grouse management. This is an aspect of the cooperative effort with local ranchers, which we continue to integrate into our mine plans.	OR	Both	rmc0074GB
764.	The south Warner region has been recognized as one of the most important "sage-grouse strongholds," throughout the Great Basin. The relative abundance of sage-grouse in this region underlines the fact that well-managed grazing is entirely compatible with sage-grouse conservation; many of our members have been successfully grazing cattle on permits with	OR	Both	rmc0078GB

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	substantial sage-grouse populations for generations. A number of District members have also been working closely with the Natural Resource Conservation Service (NRCS) to reclaim important sage-grouse habitat on their private land by removing encroaching juniper. Our community is dedicated to the responsible stewardship and conservation of the greater sage-grouse; the enviable populations of sage-grouse in this region demonstrates that ranching has a vital role to play in that process.			
765.	It is also necessary that the preferred alternative explicitly recognize the key importance of public lands ranching operations to the success of sage-grouse conservation. Scientific research has repeatedly shown that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife species. Well-managed grazing can improve sage-grouse habitat by increasing the quality and accessibility offorbs and other beneficial vegetation and also aids in the control of invasive plant species. Moreover, public lands ranchers own a significant portion of high-quality lowland brood rearing habitat as deeded property. According to NRCS, "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands." However, if regulatory measures on public lands make ranching operations economically unsustainable, these operations are frequently subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse conservation measures do not undermine the viability of public lands ranches.	OR	Both	rmc0078GB
766.	Any EIS or SEIS must also explicitly recognize the following points: Properly managed grazing can enhance sage-grouse habitat and should be incorporated into the sage-grouse management strategy.	OR	Both	rmc0078GB
767.	Any EIS or SEIS must also explicitly recognize the following points: Historical evidence indicates a positive correlation between livestock numbers and sage-grouse populations.	OR	Both	rmc0078GB
768.	We agree that several reasonable alternatives should be analyzed in each NEPA document prepared dealing with grazing. We also agree that one of the considered alternative should include deferred or rest-rotation systems and feel that if allotment size is big enough this should be the preferred alternative. In rural Utah the effect of a no-grazing alternative would be devastating to the local customs/culture/economics.	UT	Both	emc0126GB
769.	The IM Memo repeatedly points out the “State Wildlife Agency” as the important agency to talk to and get approval form. State Departments of Agriculture and the Sage Grouse working groups are the key participants with the tools to improve management on the ground. Vegetation treatments without improved management will be very short lived. Local Sage Grouse working groups should have a major voice in where and how money is spent with the advice of University Extension and local biologists. Emphasis should be placed on working with the Utah Grazing Improvement Program to improve long term Grazing management.	UT	Both	emc0126GB
770.	When Sheep winter grazing declined in our area, this resulted in the sage brush being allowed to mature and we now have 40-50 year old brush. Not good for Sage Grouse. If grazing of livestock were to stop, the ground cover would become almost impossible for the young birds to get through and find the insects they need to survive	UT	Both	emc0137GB
771.	The district believes future listing of this species would ultimately be a major detriment to continuing voluntary incentive based conservation projects, planning and the local economy. Farmers and ranchers in Southern Utah rely heavily on maintaining federal grazing allotments to sustain their livestock operations and livelihoods in the district's local communities.	UT	Both	emc0178GB

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772.	In 1960 when Sage Grouse populations were the highest in Utah, the Utah BLM permitted livestock AUMs was at 1.7 million. The Sage Grouse population decline closely resembles the decline of historic permitted livestock AUMs to the current.7 million AUMs. The numbers are very similar for Forest Service AUM's	UT	Both	emc0233GB
773.	With a small amount of fencing the grazing system used on Desseret Land and Livestock in Rich County, that has proven so beneficial to the sage grouse populations there, would be easy to duplicate on Blue Mt.	UT	Both	emc0296GB
774.	The BLM must consider the importance of the ranching and agricultural industry to the state's economy, and to the health ofthe sagebrush ecosystem.	UT	Both	emc0337GB
775.	With a small amount of fencing the grazing system used on Desseret Land and Livestock in Rich County, that has proven so beneficial to the sage grouse populations there, would be easy to duplicate on Blue Mt.	UT	Both	emc0406GB
776.	Livestock production tied directly to access and use of the federal lands is the backbone of Utah's agriculture Industry, contributing more than 65 percent of our state's $1.5 billion in farm gate sales. This contribution and its economic ripple effect are significant to the state of Utah and of critical importance to rural communities. It has been estimated that more than 70 percent of Utah's cattle and sheep utilize the public lands for some portion of the grazing year. Sustainable grazing practices, harvesting renewable forage, provides value to all Americans, enhances rangeland resources and controls dead grass and brush helping control deadly Wildfires.	UT	Both	rmc0003GB
777.	With only about 18 percent of Utah privately owned, any major agency decision that eliminates or decreases livestock grazing on federal or interspersed state lands will damage Utah's livestock industry. In a state with limited private grazing land, there are not private grazing lands available to transition to. Any reduction BLM grazing permits requiring greater dependence on purchased hay and forage will make Utah cattle and sheep operations less economically viable.	UT	Both	rmc0003GB
778.	Decisions impacting Congressional multiple-use mandates must consider the local history, culture, social and economic and how those decisions impact sustainable ranching practices. Congress recognized when the Federal Land Management Policy Act (FLPMA) was passed that without policy concessions there could be major adverse impacts on stales with federal land holding within their borders. FLPMA recognizes the contribution livestock grazing makes to the West and the economic foundation it provides for rural communities. The Taylor Grazing Act clearly determines the high priority Congress places on livestock grazing in the West based on the "chiefly valuable for grazing" principle. This is a principle that has been upheld in the courts.	UT	Both	rmc0003GB
779.	These same federal laws require a consistency review with state and local statutes. rules, policies and planning processes. Federal policies cannot adversely affect state or county land use plans and planning processes. Sovereign borders, interspersed trust lands and private property. as provided by the Fifth Amendment to the Constitution cannot be adversely affected for public use, without due process and just compensation. Utah State Law supports livestock grazing and opposes transfer of rangeland resources for wildlife through the reduction or retirement of livestock grazing rights. The basis for major investments by the State of Utah, sportsmen's groups and ranchers was to improve the habitat for all the parties and uitimately return suspended and non-use livestock grazing to productive	UT	Both	rmc0003GB

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	cattle and sheep grazing. Utah counties have adopted policies regarding public lands. These policies embrace continued livestock grazing. recognizing the "grazing right" as granted by federal law. The counties are on record as opposing the transfer of livestock grazing rights to wildlife utilization based on a federal agency's reasoning of "rangeland health reasons." In addition. the counties have recommended vigorous treatments of areas overrun with invading species like pinyonjuniper and other woody plants adversely affecting multiple use. Any reduction in livestock grazing must be based on science.			
780.	The Utah Sage Grouse Initiative has aggressively addressed habitat related issues and is designed to sustain working ranches while focusing local attention on threats facing Sage Grouse populations. Utah Farm Bureau county leaders have been engaged in Sage Grouse Working Groups. Utah's Grazing Improvement Program (GIP) is focused on range health, productivity and sustainability of the grazing resource for livestock. wildlife and Sage Grouse habitat. Millions of dollars of federal, state and private resources have been invested in implementing conservation practices that improve Sage Grouse habitat through seeding with Sage Grouse food plants, installing fencing and water improvements beneficial to Sage Grouse, removing pinyon-juniper in sites critical to grouse numbers and incorporating livestock grazing rotations beneficial to Sage Grouse.	UT	Both	rmc0003GB
781.	Utah Farm Bureau policy related to the Endangered Species Act supports any cost burdens affecting private landowners should be borne by the public not the farmer or rancher. Efforts related to restoration or monitoring of sensitive species should be based on sound science. And Utah Farm Bureau opposes endangered, threatened or sensitive species taking priority over established water, property or grazing rights.	UT	Both	rmc0003GB
782.	Predation - In the agency assessment of threats to Sage Grouse, predation is identified as approximately half the threat as agriculture and grazing. Our experience in Utah suggests otherwise. Proper grazing enhances Sage Grouse habitat and populations. Proper grazing practices allow Sage Grouse to strut and more safely occupy habitat where they can observe predators like fox, ravens and coyotes. Utah's Strawberry Valley experience suggests that predators are a major threat to Sage Grouse. In an area with no energy development or livestock grazing. Sage Grouse numbers have been greatly impacted by predators - especially fox and ravens.	UT	Both	rmc0003GB
783.	Agency Land Management Policies - BLM and Forest Service policies related to invasive species. wildfires and predators along with strategic livestock grazing should be reassessed pertaining to Sage Grouse habitat. Reduced livestock grazing and reduced chaining of pinyon-juniper coupled with wildfire policy have allowed invasive plant species to expand across the West. including on Sage Grouse habitat. Short duration, heavy grazing on invasive cheatgrass areas when palatable for livestock as a management tool could help return healthy livestock grazing land and Sage Grouse habitat with little or no government expenditure. Policies that don't allow chemical treatments of predators and invasive species on federal lands need reevaluation.	UT	Both	rmc0003GB
784.	Deseret Land and livestock Experience - In closing, Utah Farm Bureau would recommend the agencies review the Deseret Land and Livestock (DL&L) Sage Grouse experience. Located mainly in Rich County Utah, along the Utah-Wyoming border,	UT	Both	rmc0003GB

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	DL&L have put in place land resource management strategies that embrace livestock and wildlife habitat. Over the past 30 years, sheep and cattle stocking rates have been increased to more than double the stocking rate on most federal lands while the number of Sage Grouse, an ' ·indicator" species, have increased by five times.			
785.	We believe that prescriptive grazing is and historically has been a major factor in maintaining the health and sustainability of our lands in the west. We believe this to be a recognized and proven method that, recognized and used as a tool will promote Sage Grouse habitat restoration and preservation. As grazing is one of the strongest tools we possess, we believe it is absolutely necessary that public lands ranching involvement and input into the EIS/SEIS and later the amendment process is crucial.	UT	Both	rmc0026RM
786.	The position that the threat of possible Sage Grouse listing has placed our citizens, western land states and their local government entities in, we view as a direct result of years of federal regulatory onus. Carbon Comity shall take a willing role in working to remedy this issue but believe that until the federal agencies and our national leadership recognizes that; reducing grazing AUM's west wide consistently for over 50 years, listing under ESA the natural predators of the grouse species, outlawing the use of poisons used to prevent predation and the promotion of fuel/biomass buildup by interrupting natural fire regimes have hosted the consequences weand the bird now endure.	UT	Both	rmc0026RM
787.	My biggest concern is that this will in someway inhibit grazing on the grasslands. As a TBGA Board member I don't want any of our permitees to lose AUM's. We need to preserve our rights to graze the land in The Thunder Basin National Grasslands, as well as defend private property rights.	WY	Both	cfc0019RM
788.	Tuesday, March 13, 2012 there were at least 10 sage grouse strutting on Keyton 1 lek. Cattle were also on the lek. Sunday, March 18, 2012 there were 12 strutting males. Monday, March 19, 2012 there was a golden eagle near the lek and no grouse. I realize this is "anecdotal" and we here on the ground are "not credible" but this is the truth.. It's not cattle, traffic or fences that have caused grouse problems.	WY	Both	cfc0032RM
789.	Policy Statement 7: West Nile Virus: ‘ Artificial water impoundments will be managed to the extent of BLM’s authority for the prevention and/or spread of West Nile Virus...This may include..(c) building steep shorelines to reduce shallow water and emergent aquatic vegetation; (d)maintaining the water level below rooted vegetation; (i) restricting access of ponds to livestock and wildlife (Doherty 2007).The BLM mentions several instances where they would regulate reservoir use by fencing out, making the banks too steep for livestock use, keep water level low: The reservoirs on federally managed lands are for the wildlife as well as livestock use. If the reservoirs are fenced out, banks made too steep or the reservoir is unfit for livestock to use; the water will also be unfit for wildlife use. Young elk, pronghorn and deer will not be able to get out of steeply sloped reservoirs any more than sheep or cattle. You are not allowing yourselves to look at the whole picture. Multiple use means wildlife and livestock. The use of larvicide is a good recommendation if used according to the label.	WY	BLM	emc0050RM
790.	Fencing out is a bad idea because if an animal is thirsty enough they will crawl over and then either be caught in the fence or unable to get back out to graze. Eventually the fence will be down and be a hazard with loose wires to entangle animals. This applies for wildlife as well as livestock.	WY	Both	emc0050RM
791.	There are several legal documents that uphold the right of landowners and livestock owners to use trails, pasture and reservoirs on federally managed lands. One of these is the MCKELVEY VS. US where the Supreme Court ruled that a stock	WY	Both	emc0050RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	trail 3 miles in width established in local custom was equally as legitimate as an SRHA stock trail. Cattle owners or their employees who have such ROWs (rights-of ways) are the owners of such ROWs and cannot be held guilty of trespass by the use of such ROWs. (Curtin vs. Benson 1911). "Land to which right and claims of others exist is not public land" -upheld by the U.S. Supreme Court.			
792.	In Steptoe Live Stock Co. V. Gulley, 295 P. 772 (1931) the Supreme Court of Nevada held that the establishment of livestock trails providing access to water sources was sufficient to constitute a valid appropriation and establishment of water rights. There are numerous other precedents set by several courts showing that a livestock owner has a right to use the water on federally managed lands. BLM does not have complete authoritarian control over the federally managed land for right of water usage. The water is for multiple use not just wildlife.	WY	Both	emc0050RM
793.	If road closures for a time period during the year is considered then the lease holder and local landowners must be allowed to travel the areas roads as needed for maintenance and livestock needs. Their travel cannot be limited to certain times of the year if they have ranching requirements that must be met. The same must be taken into consideration for trailing, branding, docking, feeding, calving and lambing of livestock, as well as irrigation and summer hay cutting. These ranching activities all occur with regularity within the time frame of the courting and nesting of the sage-grouse (March 1-June 30) The ability of the landowner and lease holder to adequately calve or lamb and take care of their livestock must be placed in the forefront as well. It is possible to take into the consideration the management and conservation of a species without causing undue hardship on landowners living in the area. Landowners are limited by area landscapes and habitats as well when it comes to adequately protecting newborn livestock. Their livestock management plans are made well in advance each year and for the most part cannot be easily changed. Corrals, barns and other facilities needed for livestock cannot be transported to far away pastures for shelter and convenience. Some pastures are used at the same time each year for the specific reason that they will help provide nourishment and shelter to a landowner's livestock from storms during the spring of the year.	WY	Both	emc0050RM
794.	I have seen cattle and sage grouse grazing and resting side by side. The cattle will keep the predators away to protect their calves. Yearlings will follow a coyote for a long way out of curiosity. My point is that sage grouse are safer with cattle in the same area because the coyote, fox and bobcat will be not as prevalent.	WY	Both	emc0050RM
795.	Work to address and prevent overuse areas by managing for good livestock distribution'. (pg. 3 attachment 8). Part of good distribution of livestock is the availability of water in harder to access areas. Livestock will not walk any farther than necessary to reach water. All wells and other water resources such as develop springs and reservoirs placed away from natural riparian areas will help protect those riparian areas. Authorize new water development for diversion from spring or seep source only when priority sage-grouse habitat would benefit from the development (page 16 National) The more water available in a pasture the less use any one watering place will have and the less damage to sage grouse habitat in the area. There needs to be several areas of water available to prevent one part of a pasture from being overused.	WY	Both	emc0050RM
796.	'For actions other than those taken for human health and safety, regulatory compliance or emergency, BLM FOs must determine if any activity proposed...is "disruptive" by determining if the activity would require people and/or the structure or activity to be present in these habitats for a duration of more than 1 hour during any one 24 hour period...' (page 5 letter). This should include the trailing of livestock. When moving livestock the area is seldom disrupted over an hour; unless the	WY	Both	emc0050RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	herds are excessively large. In this case rather than the federal agencies overregulating the livestock owner: the herd could be split and moved on continuous days so as not to disrupt a core area more than an hour on a 24 hour period.			
797.	Livestock trailing that is authorized through crossing permits...will include a trailing plan that...will include specific routes and timeframes for trailing.(page 15 letter) This could cause undue hardship on a landowner trying to get livestock from point A to point B during a certain time of the year. If a route chosen by BLM is several miles around a core area and the time frame is chosen to be weeks or months later than a landowner needs then you are forcing the landowner to pay the extra expense of buying trucking or not to move his livestock at an opportune time for them. BLM is not in the ranch management business and again I would like to refer you to the ROW-Rights-of-Way- precedent stated as #3 of my comments. If a landowner will not be in an area over 1 hour for disruption of a specific sage grouse area- we are not talking miles here-then the trail activity should not be considered a disruption. If there are concerns about the presence of leks or sage grouse nests in and area, then the BLM should let the landowner or lease holder know where these are and the livestock owner would be very willing to do their best to mitigate any disturbance in an area or to avoid leks altogether. Communication is the key here. Landowners are usually receptive to concerns if presented in a positive way and are willing to do what they can to cause as little harm as possible to any wildlife within reason. You might be surprised how well things will work out if the livestock owner is given an opportunity to deal with a concern over nesting or leks.	WY	BLM	emc0050RM
798.	'Activities excepted by the State plan from the conductance of a DDCT calculation' (page 7 letter) What about herbicide and pesticide use that occurs on the rangeland away from roads, locations, pipelines and ROWs---? The treatment of pests and noxious and exotic invasive grass species are important to help any habitat improve. If the treatment will not disturb a specific area for more than 1 hour in a 24 hour period and will not reduce the sagebrush canopy as per the WGFD protocol then these treatments should be exempt as well. And so noted.	WY	Both	emc0050RM
799.	'In all cases, direct, indirect and cumulative impacts of proposed action on sage-grouse, other wildlife and all other impacted resources must be described regardless of distance from the project or whether inside or outside sage grouse core areas.' (page 9 letter). Also included in this must be the direct, indirect and cumulative impact of the proposed action upon livestock management or grazing plans. What is the maximum distance considered here 11 miles, 4 or ?	WY	Both	emc0050RM
800.	When several small or isolated allotments occur within a watershed or delineated geographic area, strive to evaluate all of the allotments together. (page 15 letter) This should only be considered if the allotments are under the same or very similar management. One lease holder should not be punished for the mismanagement of another lease holder and by evaluating all allotments together there is a chance of this occurring. Make sure there is a stipulation where the allotments are evaluated separately if there is a negative assessment that results from the overall group evaluation.	WY	Both	emc0050RM
801.	Evaluate the potential risk .. from existing structural range improvements. Address potential for modification of those structural range improvements, identified as posing a risk during the renewal process.(page 17letter) Just what structural range improvements does the BLM mean here? Corrals, windbreaks, fences, sheds, ditches, dams, windmills? If these things have been there several years the grouse are already using them to their best advantage. If new windmills or reservoirs are needed then the grouse can take advantage of these to not travel so far. What are you referring to here? Just fencing-then so state.	WY	Both	emc0050RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
802.	Implementing management actions after land health and habitat evaluations (page 15 National) There are grazing rights on federally managed lands and the removal of livestock from a grazing area must be a last resort. Manage the timing and numbers of the livestock to acquire the forage base desired-if a rest is needed then another area should be offered to the lease holder for grazing privileges. If the lease holder has purposely overstocked and grazed a much longer time than stated on the lease then livestock removal might be considered. Range conditions can be low for numerous reasons that do not involve livestock. Before removal the burden of proof must be on the BLM to prove the negative range evaluation is due to the livestock use.	WY	Both	emc0050RM
803.	Maintain retirement of grazing privileges as an option in priority sage-grouse areas when base property is transferred or the current permittee is willing to retire grazing on all or part of an allotment (Crawford et al. 2004 page 17 National) People buy base property with the expectation that the grazing leases will follow the land. The new purchaser should have the option to use the grazing lease and if they decline and the land in question is part of a grazing association then the grazing lease must go to the association for others to use. Grazing is not a privilege but a federally mandated right as part of multiple use of federally managed lands.	WY	Both	emc0050RM
804.	There is no scientific data that proves livestock grazing is harmful to sage grouse. The BLM and Forest Service and the US Fish and Wildlife Service all must use proven "sound" scientific data before they enact any regulatory mechanisms over landowners and livestock managers.	WY	Both	emc0050RM
805.	There should be no prescribed burning of forage within sage grouse core areas unless it is for ditch cleaning or similar maintenance. When prescribed burns occur within core areas that presents a disturbance that counts towards the total 5% surface disruption. The managing federal agency can then come back and cut the AUMs in that area because there has been too much surface disturbance—due to the burn. A planned burn by any federal agency should occur outside of the core areas for this reason. Lease holders should not be punished by a drop in AUMs because the federal agency decided to do a burn within a core sage grouse area.	WY	Both	emc0050RM
806.	i. Lander, WY RMP Alternative B stresses avoiding construction of new infrastructure (such as fencing) and instead focuses on livestock grazing management throughout seasons of use and lower forage utilization. This alternative includes the removal or modification of existing fences when and where opportunities exist.	WY	Both	emc0089RM
807.	i. Lander, WY RMP Alternative B stipulates light livestock grazing levels in areas typically preferred by cattle, such as riparian-wetland areas, adjacent upland areas, and around salt and mineral supplements and water troughs and developments. Also, Alternative B prohibits salt or mineral supplements within 0.5 mile of riparian-wetland habitats to prevent livestock congregation at water sources. Alternative B prohibits the placement of salt or mineral supplements within 0.6 mile of greater sage-grouse leks. All these provisions would protect important sage-grouse habitats (foraging areas, breeding areas, nesting areas) from livestock trampling and the impacts of heavy plant utilization.	WY	Both	emc0089RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
808.	14) Identify and remove or modify rangeland fences which cause sage-grouse deaths due to collisions.	WY	USFS	emc0144RM
809.	Livestock grazing are important issues locally as is energy development in the Hoback Basin.	WY	USFS	emc0144RM
810.	In the particular case of the Casper area, overuse of sagebrush by big game and livestock is an important issue (BHSBLWG 2006:13).	WY	Both	emc0343GB
811.	From what we can determine, the mapping for Wyoming for this current EIS process just defaults to the flawed Core mapping. We are very concerned about the Wyoming Core model development and the process by which it was imposed on public lands there. A presentation in Boise by the Wyoming Core Area facilitator, Mr. Budd, heightened our concerns. The process that came up with the Core Model was not really consensus. Mr. Budd, the facilitator, admitted that he at times dictated. Plus, it is clear that this process ignored important scientific considerations. For example, Budd showed outright scorn for essential components of arid lands ecosystems like microbiotic crusts, and has a strong prolivestock industry bias. So that entire process minimized consideration of livestock grazing disturbance effects. And this is the very same bias carried forward in the NTT's extremely weak and minimal grazing provisions, and the IM's even weaker application of these provisions, along with its apparently providing no protections at all to general habitats related to grazing, in apparent violation of the BLM's 2004 Conservation Plan.	WY	Both	emc0411GB
812.	(8) The NOI is silent as to the protection of existing m:es (even though it states it will "re(.:ognize valid existing rights"). Our question is: Is grazing considered as a "valid existing right"? The Wyoming ELM signed-off on a Wyoming IM: that approved the Wyoming Core Area Plan that averred existing uses, in-place as of2008, were not subject to stipulations (aka conservation measures) within core areas. Are the amended RI\,fp's going to follow this same approach?	WY	Both	fxc0011gb
813.	The WDA supports the greater sage-grouse strategy outlined in the Governor's Executive Order 2011-05, particularly Attachment C (Exempt Activities). The list of Exempt (de minimus) Activities includes several livestock grazing management practices that have occurred on public lands for more than 100 years. In addition, the Wyoming Standards for Healthy Rangelands and existing regulations allow Federal agencies the flexibility to make meaningful and educated adjustments to livestock grazing management if conflicts with other resources occur. Livestock grazing management decisions should be made on a case-by-case, allotment-by-allotment basis and not as an overarching land use planning decision. Because of these reasons, the WDA does not believe it is necessary to address livestock grazing management in the upcoming EISs/SEISs.	WY	Both	rmc0010RM
814.	The WDA strongly recommends that planning criteria includes information from Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-grouse Habitat (Cagney et al. 2010), and recommendations developed by Local Sage-Grouse Working Groups and the forthcoming Great Sage-Grouse Programmatic CCAA for Wyoming Ranch Management. In addition, peer-reviewed science and solid monitoring data should underlie decisions. The Amendment needs to identify the science supporting the discussions, decisions and actions.	WY	Both	rmc0010RM
815.	Secondly, I question strongly the notion that AUM cuts on grazing allotments will have any effect. If grazing is truly a factor, why were sage grouse so plentiful from the 1950's through the 1970's? This is a time frame when, typically, turnout dates were earlier and grazing allotments were not near so closely monitored, further, stubble height should not be used as a benchmark for sage grouse habitat, adjacent to leks. Soil type, in this instance is critical I am familiar with two leks in our area (on private land) that are located on white hardpan, which would never have sufficient srubble height on an exceptional year.	WY	Both	rmc0012RM, rmc0022RM

Table C-6.A
Comments Related to Livestock Grazing

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	Stubble height requirements, in my view, could be used in an arbitrary and capricious way to force AUM cuts, without any corresponding benefit to sage grouse populations.			
816.	Specifically, the EIS affecting three permit holders in the Antelope creek drainage should be revised. The proposal to cut a month from the grazing season on these permits should be changed to 15 days, taken from the early season. Removing 15 days from the winter part of the grazing season seems arbitrary, and will not enhance sage grouse populations in that area The permit holders have shown a willingness to compromise. The BLM should reciprocate and work with them, to avoid hurting the viability of their cattle operations.	WY	Both	rmc0012RM, rmc0022RM
817.	Through the rotational grazing and management of its resource, the 4W is an economically viable ranching business along with being an abundant wildlife haven. Sage-grouse thrive on the northern 1/3 of the ranch, where our winter and calving pastures are located along with active leks. Why should this vibrant livestock operation be forced to change its proven stewardship to accommodate unproven theories when it comes to the livestock grazing and management of this ranch and this area? This position is supported by the following Policy Analysis Center for Western Public Lands3 PACWPL Policy Paper SG-02-02.	WY	Both	rmc0034rm
818.	Properly managed grazing should cause no harm to the Sage Grouse, yet curtailing grazing is always one the first actions land agency managers have on their list of actions.	WY	Both	rmc0044RM
819.	While it is temptillll to reduce grazing, primarily be<;ause it is easy to accomplish, reducing or even eliminating grazing will accomplish little to improve habitat for the sage glOUse, except possibly In a very few small key areas. The ad'/i!rse effects on the economy outwei&h the benefits of reducing grazing. Other conservation efforts will be much more productive to increase sage grouse populatiOns.	WY	Both	rmc0045RM
820.	Regarding the proposed Plan Amendment changes as presented at the Douglas scoping open house on February 7. 2012, Current provisions of the Plan are more than adequate to conserve sage grouse habitat insofar as grazing is concerned- no changes are needed. Indeed, if current provisions are implemented to their full extent, significant adverse effects to grazing would be reaii'ed with only a small amount of habitat improvement. Suitable habitat is currently present- other factors than habitat improvement must be implemented, as described above. For the sage grouse population to recover.	WY	Both	rmc0045RM
821.	The SG plan seems to presuppose that most SG population decline is due to livestock grazing and mineral extraction. This point of view may be based leks on science and more on a particulcu political point of view. There seems to be a difference of opinion between" best available science" and the observations of those who live and work on the land.	WY	Both	rmc0048RM
822.	I have found through many years of ranching experience that the management that is good for the land is good for the livestock and what is good for the livestock is good for the wildlife is as well. Heavy consideration should be given to the people and communities who depend upon the land for their livelihood. Under no circumstances should there be a reduction of AUM's and absolutely no retirement of grazing permits. Especially if the managing agencies are not willing to actively control predation.	WY	Both	rmc0048RM

Table C-6.B
Comments Related to Farmland and Agricultural Use

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	In 2008-2009 leks were cut in half, agriculture caused reductions in leks as did a lot of roads. Sage-grouse were found to be half as likely to maintain their nests in Silver Sage as in Big Sage. North Dakota saw a tremendous drop in bird populations.	All	Both	emc0012RM
2.	Much of sage grouse habitat is on private land. If economic and political factors encourage the ranch to try farming, this habitat will be lost to the plow.	All	Both	emc0013RM
3.	Each proposed conservation measure in the EIS should be analyzed in terms of how much it costs and how much the grouse population will benefit. The following conservations measures should be included in this analysis: - Various methods of coyote control. - Various methods of raptor control. - Various methods to reduce danger from fences. - Various methods to reduce danger from vehicle traffic. - Various methods to protect grouse from disease. - Various methods to limit exposure to pesticides. Each method should be rated according to two measures: 1. Number of grouse saved per dollar spent on materials and labor. 2. Number of grouse saved per laborer-hour of time spent. When considering these measures, the EIS should analyze costs from three different viewpoints: 1. When the BLM employs the person doing the labor; 2. When the BLM contracts with a third party to do the labor; 3. When the BLM encourages ranchers or other partners to perform the labor. Ranchers' time and BLM funds are limited. The RMP should focus on conservation measures that provide the highest return for the time and money invested.	All	Both	emc0013RM
4.	The EIS should study the impact that pesticides might be having on sage grouse in regions where the grouse are not doing as well as they are in northeast Montana. The RMP should acknowledge that keeping private land owners in the cattle business is preferable to forcing them to try crop-raising methods that might rely on chemicals harmful to sage grouse.	All	Both	emc0013RM
5.	Whenever the RMP considers a course of action that could reduce the economic viability of a ranch, it should also consider whether that course of action would harm sage grouse by increasing the likelihood that the ranch would plow prairie, overgraze, or sell land to developers to compensate for the lost revenue.	All	Both	emc0013RM
6.	The EIS should propose a study of the impact of pesticides on sage grouse in regions where the grouse are showing long-term decline.	All	Both	emc0013RM
7.	The RMP should explore ways to keep ranches grazing the land instead of farming it.	All	Both	emc0013RM
8.	West Nile virus, which is linked to standing water associated with some forms of energy development and agricultural water use, also poses a threat to greater sage-grouse in the Eastern Region. Naugle et al. (2004) showed that up to 25% of a population may die due to West Nile virus. The BLM produced an Information Bulletin (MT-2011-033) regarding best management practices to reduce the availability of breeding grounds for mosquitoes that carry West Nile virus. We recommend that these best management practices be implemented across BLM lands and particularly in sage-grouse core areas to prevent the death of this species. WWF has also produced, along with partners at the University of Wyoming, a spatially explicit map showing where West Nile virus is most likely to become prevalent under climate change conditions (Schrag et al. 2011). Areas with a high threat of West Nile virus (areas coded in yellow, orange and red in the figure below) that are located within core areas should be prioritized for reduction of standing water and other factors that increase the likelihood of becoming Culex mosquito breeding grounds. *Included an attachment (Figure 4)	All	Both	emc0034RM
9.	If the many agricultural groups to which most rural people belong (Farm Bureau, Farmers Union, National Cattlemens and many others) were asked to find a voluntary solution to protecting the Sage Grouse, it could be done without costly and	All	Both	emc0082GB

Table C-6.B
Comments Related to Farmland and Agricultural Use

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	obstructive regulations			
10.	The Prairie Chicken in eastern Colorado has benefitted from such cooperation. Former Colorado Agriculture Commissioner with the Colorado Division of Wildlife and these same entities did a good job without the interference by federal agencies and extreme enviros with the winner being the Prairie Chicken. The same could be done in other states for the Sage Grouse.	All	Both	emc0082GB
11.	Ranchers and farmers live in these beautiful, rural areas. We try to be good stewards of the land we use. A lot of it we share with many others with the same values.	All	Both	emc0082GB
12.	We have managed our grazing leases for many years so as to enhance the resource for our livestock and for the wild species which also make the forest their home. Research shows that healthy private land ranches are crucial to healthy adjoining public lands. See Maestas, et al 2001. This was the subject of a paper, "Ranching as a Means of Conservation," presented by Dr. Richard Knight, Colorado State University to the Society for Rangeland Management in 2007. Go to the following link to read the paper: http://www.allenpress.com/pdf/rala-29-05-04-09.pdf The economic success of our ranching operation is inextricably tied to our ability to graze our livestock on BLM and Forest Service lands. Without our grazing leases, we would not be an economically viable ranch. Not only does the prosperity of ranches like ours enhance the quality of contiguous landscapes and habitats, but they add to the long-term viability of rural communities. Most importantly, agricultural operations produce food. USDA Secretary Thomas Vilsack addresses the need for food production. "We need to increase both the sustainability and productivity of global agriculture so that food is available, accessible and usable to people everywhere in the world,"	All	Both	emc0088RM
13.	While this may seem far afield for comments on Sage Grouse, we want to emphasize that healthy sage grouse habitat goes hand-in-hand with private/public lands ranching. These ranchlands, including ours, keep the landscape open and provide the habitat essential for such keystone species. Good management for livestock and wildlife speaks to Secretary Vilsack's point of sustainable food production.	All	Both	emc0088RM
14.	I expect that comments from radical groups such as Western Watersheds will be less inclined to respect the role that livestock husbandry plays in the health of the forests, wildlife habitat, open space, rural community vitality, food production and national security. We hope that reviewers will consider the positive role of grazers, both for species such as Greater Sage Grouse, and for positive contributions which fit into the Mission Statements of the USDA and the Forest Service.	All	Both	emc0088RM
15.	While this may seem far afield for comments on Sage Grouse, we want to emphasize that healthy sage grouse habitat goes hand-in-hand with private/public lands ranching. These ranchlands, including ours, keep the landscape open and provide the habitat essential for such keystone species. Good management for livestock and wildlife speaks to Secretary Vilsack's point of sustainable food production.	All	Both	emc0088RM
16.	We have managed our grazing leases for many years so as to enhance the resource for our livestock and for the wild species which also make the forest their home. Research shows that healthy private land ranches are crucial to healthy adjoining public lands. See Maestas, et al 2001. This was the subject of a paper, "Ranching as a Means of Conservation," presented by Dr. Richard Knight, Colorado State University to the Society for Rangeland Management in 2007. Go to the following link to read the paper: http://www.allenpress.com/pdf/rala-29-05-04-09.pdf The economic success of our ranching operation is inextricably tied to our ability to graze our livestock on BLM and Forest Service lands. Without our grazing leases, we would	All	Both	emc0088RM

Table C-6.B
Comments Related to Farmland and Agricultural Use

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	not be an economically viable ranch. Not only does the prosperity of ranches like ours enhance the quality of contiguous landscapes and habitats, but they add to the long-term viability of rural communities. Most importantly, agricultural operations produce food. USDA Secretary Thomas Vilsack addresses the need for food production. "We need to increase both the sustainability and productivity of global agriculture so that food is available, accessible and usable to people everywhere in the world,"			
17.	I expect that comments from radical groups such as Western Watersheds will be less inclined to respect the role that livestock husbandry plays in the health of the forests, wildlife habitat, open space, rural community vitality, food production and national security. We hope that reviewers will consider the positive role of grazers, both for species such as Greater Sage Grouse, and for positive contributions which fit into the Mission Statements of the USDA and the Forest Service.	All	Both	emc0088RM
18.	Wildfire Management Wildfire management has two components, range grass fuel buildup and USFS timber loads. Range fires throughout Southern Idaho and portions of SE Idaho may have been limited through the use rotational grazing and developing fire breaks. There are numerous areas that no longer are utilized for grazing, such as the INEL, thus creating a significant fuel load that devastates huge sections of sage grouse habitat. The failure to provide management action, whether grazing, controlled strip burning on ungrazed federal lands, or restoration of previously burned areas, needs to be included within the NEPA process, so the cumulative affect of these inactions on the habitat is considered.	All	Both	emc0112GB
19.	The sage grouse management measures being contemplated have a potential for a large impact on hay farming and cattle ranching business. And measures to protect and enhance the grouse will come on top of significant impacts to livestock operations by a rapidly expanding Oregon wolf population.	All	Both	emc0173GB
20.	OFS is concerned that protection measures could severely limit the ability of farmers and foresters to effectively manage their lands.	All	Both	emc0221GB
21.	I am glad to hear that efforts are being made towards working with land owners whose land includes sage grouse habitat. This is a good step. However, effort should also be made working with farmers whose land is adjacent to sage grouse habitat. Specifically hay/alfalfa farmers. I say this based on an experience I had several years ago. I am an avid bird hunter and have been hunting sage grouse since I was old enough to hunt. I was scouting sage grouse in August and found a alfalfa field that bordered public land. This was west of Roberts and south of Mud Lake within a few miles of the INL border. In the evenings I would see between 100 and 200 grouse fly out of the alfalfa and into the adjacent sage brush. So opening day I went out to shoot my grouse. I only saw 3 birds and the alfalfa field was cut. Trying to figure out where to go next, I looked up and a farmer was driving across the field towards me. He stopped and started taking. He was unfriendly towards me even though I was on public land. I told him I had seen hundreds of grouse in his field a few weeks earlier and virtually no birds today. He smiled and said it was because he had killed them all. He said that when he cut his field, the birds could not get out of the way from his swather. He showed no remorse. I was disgusted. Anyway, I think it would be beneficial to discuss solutions with land owners such as this. Maybe there is something that could be placed on the swather that would scare the birds up before it gets too close.	All	Both	emc0231GB
22.	The worldwide food demand will increase exponentially in coming years, and it is vital that sustainable food production be allowed to continue.	All	Both	emc0236GB
23.	Livestock grazing of public lands is unique in that it converts a product unusable by humans (grass), to a product that is consumable by humans (meat), in an all natural, environmentally sound manner. Careful, balanced management of public lands	All	Both	emc0236GB

Table C-6.B
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	grazing is of course central to the success of the multiple use ideal.			
24.	Keeping food production safe and sustainable leads to a safe, plentiful, and affordable food supply for our nation and the world community. Public land grazing is an integral part that, and the dubious status of the sage grouse should not preclude that.	All	Both	emc0236GB
25.	Let us instead go back to the practices that helped the birds flourish. These are agriculture and grazing and a vigorous program to control predators such as crows, ravens and coyotes.	All	Both	emc0249GB
26.	We believe that, if anything, the ranchers help the sage grouse by controlling some of the predation problem, maintaining habitat and water supplies, and helping to reduce wildfire threats (which destroy the sage brush so needed by the sage grouse) by grazing the land and minimizing overgrowth of vegetation.	All	Both	emc0293GB
27.	As America's Federal private lands conservation agency, we see the potential for our agency to make a significant difference in the sage grouse conservation efforts across the west. To highlight and coordinate this, NRCS announced its "Sage Grouse Initiative (SGI)" in 2010. SGI has harnessed the power of the Farm Bill to strategically focus budgets and partner funding matches.	All	Both	emc0300GB
28.	There is a positive synergistic relationship between sage grouse welfare and ranching use. Livestock producers stress predator control, help with fire control, and do project work like water developments that benefit wildlife as well as domestic animals. Sage grouse and ranching needs can both be met while rangeland health is improved.	All	Both	emc0307GB
29.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Management of agricultural lands can adversely affect sage grouse (e.g. pesticides and crop harvesting)	All	Both	emc0343GB
30.	Farming creates single-crop monocultures that lack the habitat elements needed by sage grouse for their survival. Taylor et al. (2010) found that agricultural tillage also contributes to sage grouse population declines. It is rare for tillage to occur on BLMmanaged surface estate, and it is typically limited to private surface. As BLM has little ability to guide the management of private surface as regards agricultural uses, the Plan Amendments should stick to a moratorium on agricultural tillage on BLM-managed surface for both Priority Habitats and General Habitats for sage grouse.	All	Both	emc0343GB
31.	BLM is to: - Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership. These features are: paved highways, gravel roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells and facilities, pipelines, landfills, homes and mines. This definition purposefully omits fences that kill sage-grouse, livestock water developments that promote West Nile virus and severe degradation of de-watered spring habitats, and degraded upland habitats. Spring developments dry up or greatly reduce flows and shrink meadow and other brood rearing areas. It omits disturbance such as imposing large herds of livestock - including in combination with damaging facilities and management practices. The degree and severity of understory degradation into areas where pipelines or roads are built - are habitat-degrading anthropogenic disturbances associated with livestock grazing. Livestock grazing disturbance is an imposed impact caused by man. Domestic livestock are not native to the sagebrush biome (Mack and Thompson 1982), and are imposed by humans with catastrophic historical degradation and loss, and chronic continuing harm- including landscape-level desertification, and loss of habitats and populations. Plus this ignores blocks of private cropland and activities that may already occur in these habitats. How are these going to be dealt with? Careful examination of the wording shows that lands could be completely torn to pieces, but BLM will be able to look at the direct	All	BLM	emc0411GB

Table C-6.B
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	bulldozed disturbance, and not the real ecological Footprint or impact of the disturbance. For example, there is a large difference between the many square mile visual Footprint of a wind turbine, and the bulldozed footprint where turbines are placed- the difference is square miles vs. small fractions of a mile.			
32.	Lassen County is not wealthy when compared to other counties in California. It ranks 50 out of 58 in per capita income. It is a large rural county with agriculture providing a significant contribution to the county's economy. As such, county planners included a section within the revised land use plan completely devoted to agriculture. In the Agriculture Element within the county land use plan Goal A-5 states, "Productive cooperation with and from Federal and state agencies which manage natural resources in Lassen County and improved consistency in resource management objectives, policies and programs." Lassen County appreciated the need to cooperate with Federal agencies when land use policies were revised.	All	Both	rmc0038GB
33.	Additionally, Sanpete County is a predominately agriculture county. Our farmers and ranchers rely on the Forest as well as the BLM lands for grazing. It was hard to determine exactly from the maps who will be impacted by conservation measures included in the BLM and Sanpitch Mountain Range LUPs specific to our county, but we would hope that a cooperative management strategy would be proposed for those farmers and ranchers who use grazing permits in those areas.	All	Both	rmc0043GB
34.	Production agriculture is also important in maintaining some of the late summer habitat found in irrigated hay meadows and other moist areas. The agricultural producers in North Park are effectively maintaining sage-grouse habitat by keeping the vast majority of North Park undeveloped. We would request thorough analysis of the impacts of removing production agriculture on the overall quantity and quality of sage-grouse habitat.	CO	BLM	emc0060RM
35.	Actions that reduce or minimize sage brush habitat include: -New conversion of sagebrush land to cropland	IDMT	Both	rmc0028GB
36.	The Taylor Grazing Act protected the BLM lands from the plow, but it is the partnership with the BLM that protects private lands from the plow. Many pastures include private and BLM rangeland within the same fence.	MT-RM	Both	emc0013RM
37.	In conclusion, Judith Basin County believes ranching and farming are the most efficient and cost effective means to sustain wildlife populations, while also producing food and fiber for our nation. It is important that conservation activities work hand-in-hand with agriculture, because negative impacts on ranching will have negative impacts on sage grouse. Our county recommends that your agency continues to enact or develop strategies that will benefit both agriculture and the sage grouse population.	MT-RM	Both	rmc0023RM
38.	Much of the federal lands that wildlife, including the sage-grouse, benefits from today were developed by pioneer agriculturists yesterday. In many cases the green Nevada we have today is directly due to the land development practices by agriculturists over the past 150 years. Many of the projects done on private property to develop and increase agriculture production have also developed new habitat areas for the sage-grouse. Nevada agriculture producers are first and foremost stewards of the land because of its importance to the sustenance of their family. I hope that your team evaluates how agriculture can be used as a tool to increase the health of the Nevada range and wildlife habitat.	NVCA	Both	emc0269GB
39.	I am extremely concerned about the impact the above referenced Notice of Intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities. The conservation of rangelands for livestock production is extremely important, not only to the sustainable production of food and fiber for the United States and worldwide markets, but also to providing quality	NVCA	Both	flj0000GB

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	habitat to support wildlife populations.			
40.	The table lists agriculture as the 4th greatest threat. Again, we would like clarification.	NVCA	Both	rmc0064GB
41.	The economic and social values of the local agriculture and ranching community in Malheur County are important considerations that must be studied and taken into account for the sage grouse EIS. Habitat protection areas for this species of bird should be careful y studied to retain compatibility with the private landowner's business activities to avoid conflicts. Livestock and agriculture production are primary economic concerns in Malheur County and land management opportunities on federal and state lands must remain flexible (Q meet the needs of the community as well as sage grouse.	OR	Both	emc0136GB
42.	Economically viable farming and ranching operations provide both stewardship of I public lands and economic vitality to local and regional communities. This fact should not be ignored in the crafting of the EIS or resulting management plans.	OR	Both	emc0221GB
43.	The BLM must consider the importance of the ranching and agricultural industry to the state's economy, and to the health of the sagebrush ecosystem.	UT	Both	emc0337GB

Table C-7.A
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	I do not support closures Rds. As this will allow an increase in predators.	All	Both	cfc0007GB
2.	As the bird goes so go other species. Our obligation is to protect.	All	Both	cfc0008RM
3.	Control of predators- fox, ravens, crows, raptors, coyotes. The area around the north end of the Sierra's hasn't changed in the almost 50 years I've been here. Except there are no longer 500,000 thousand sheep in this county, and coyotes were controlled. Fox and ravens were non-existent. We own the Forest Edge Ranch and Tullis at the northwest of the Sierras. There is no oil, gas or coal, no subdivisions, etc. i.e. we had 4 of grouse in front of Tullis with broods of 4 & 5 & 6 & 6. We also had a den of foxes. Every week the brood got smaller and smaller until they disappeared.	All	Both	cfc0010RM
4.	The predator problem should be listed as prehaps the biggest single issue in restoring sage grouse populatins. We need more science-based research to show the full impact on sage grouse populations.	All	Both	cfc0012RM
5.	Like others at the meeting held in Saratoga on February 13, I am in favor of better predator control. If an exemption were granted, ravens would be the best candidates for thoroughgoing control in a large area of sage grouse habitat- chiefly BLM and private- over a number of years. But special attention to a few small National Forest parcels would not be useful. I believe the USFS should concentrate its available resources on the Thunder Basin National Grasslands. However, if the amendment is adopted the Forest Service should select just one parcel for related activities.	All	Both	cfc0015RM
6.	One thing you could do to help the grouse would be to remove windmill towers that are no longer being used. The towers serve as perches for raptors.	All	Both	cfc0018RM
7.	Predator control how will it be handled when controls around lek are a direct benefit to sage grouse.	All	Both	cfc0020RM
8.	Until the natural predators (raptors, canine, & etc) are controlled the sage grouse is headed down the road to being a listed species. I suggest that we start a predator control program in all priority sage grouse habitats. There has to be a balance, too many raptors and not enough rabbits result in sage grouse predation. People don't like killing, but if your going to save one species you might have to control others.	All	Both	cfc0022RM
9.	Place more focus on predator control.	All	Both	cfc0023RM
10.	Predator control should be recognized as an effective tool and should be encouraged.	All	Both	cfc0024RM
11.	"Remove, modify or mark fences." You might be able to put something on posts to keep hawks from searching but would a "flag" waving from the wires be a disturbance also? I don't know if sage grouse go under a fence for protection but we have seen rabbits do so.	All	Both	cfc0025RM
12.	The fact that we have Sage Grouse here that have co-existed with the livesstock operation for over 100 years should be proof that they are not in danger from livestock use, and grazing, waster development and control of predators actually enhance the benefits to grouse. The water we develop for livestock is very important to the birds and will not be there if cattle are removed.	All	Both	cfc0032RM
13.	I see no threats in the "predator" area listed. This is a great concern.	All	Both	cfc0034GB
14.	History - has proven there is more wildlife now than in the 1800s when trappers and settlers came west, other early journals state they had to eat their horses to stay alive. With that being the case, how do you determine what number of animals "sage-grouse" are in danger?	All	Both	cfc0046GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
15.	We need to have access to our natural resources. The problem is not drilling. The problem is predators - coyotes - wolves - crows - foxes.	All	Both	cfc0063GB
16.	Ravens especially and to a lesser degree rodents and coyotes can have a tremendous effect on nests and young birds in some areas. Predation in some areas must be addressed in the plan.	All	Both	cfc0065GB
17.	Plan updates must address the impact of predation on sage-grouse and allow for the ability to manage predators for the ability to manage predators for the benefit of sage grouse.	All	Both	cfc0070
18.	I realized the BLM has little to do with predator control, but they should support and facilitate any predator control efforts.	All	Both	ecmc0165GB
19.	comment on sage grouse, I have spent many years on the oregon high desert, on foot and horse back. There were cattle, sheep and wild horses everywhere when I was growing up, plus lots of hunters. You saw sage grouse on most ridges that had a water source. Now when I travel thru the high desert I see very few cows, no sheep, no deer, a few wild horse's and ten fold the amount of grass and sage brush that use to be there. Our government never seems to understand the most basic problem of bird or game decline, its not people it's predators. I have witnessed golden eagels catching sage grouse along with magpies and ravens eating there eggs, that's not counting the coyotes that get lucky. When I was growing up the county had a bounty they paid to get rid of these predators, now days they worship them. If you truly want the sage grouse to come back, then get somebody in leadership that understands the most basic concept of predator vs prey. The Oregon Fish & wildlife took some chicken eggs and hid them in some nesting sights in sage grouse habitat areas, what they found was the eggs were gone with in a few weeks. Thank you for at least letting the public comment on the problem even though it won't make a tinker's darn on your ruling. Clark couch	All	Both	emc0009GB
20.	Until hunters are made to trully obey the laws and stay off private land , we will be loosing more than sage grouse.	All	Both	emc0012GB
21.	I'd like to comment on the sage grouse strategy. I understand that during the 60's there were a great number of sage grouse in southwest montana. During this time period there was an active predator control going on. Sheep were being grazed in large numbers. Also at this time, eagles, falcons, hawks and the like were not protected and the numbers were down due to DDT. Cattle grazing was having a greater impact on the vegetation. Also in the 60's, large areas were sprayed to kill sagebrush and make more grass. I have dates of spraying but can't find dates and data of sage numbers for that time frame or after. I would like to see a comparison of no. of sage grouse before, during and after spraying to see if reduction in sagebrush had an effect on sage grouse numbers Since then, grazing by sheep and cattle has been reduced. Making better riparian and vegetation overall. Some burning of sagebrush was done in the 80's but since that time, sagebrush treatment has been reduce greatly. So no change in sagebrush quality! Predator control has been reduced and the eagles, falcons, hawks, etc have been protected and increased.	All	Both	emc0013GB
22.	You also need to look at predator control and birds of prey and how they affect the sage grouse	All	Both	emc0013GB
23.	I feel that the decline in sage grouse numbers not JUST habitat loss/change, it is habitat quality, predator control and birds of prey. Sagebrush needs to be disturbed, burned most likely. The govt. needs to tell the public that we can't have everything. If we have birds of prey and coyotes we most likely I won't have numbers of sage grouse and other birds. If we want more sage grouse, we need to improve the sagebrush habitat, not just lock it up and do nothing to it. And we need to reduce our predatory animals and birds. Can't have it all.	All	Both	emc0013GB
24.	It is common knowledge that when ranchers were aggressively controlling all predators, game birds were incredibly abundant. Although ranches no longer eliminate raptors, they do impact coyote populations. The RMP must include a solid study of the	All	Both	emc0013RM

Table C-7.A
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	impact of coyotes on sage grouse populations. The RMP should estimate how much the coyote population would increase and how much the sage grouse population would decrease if the ranches were not putting pressure on the coyote population.			
25.	Each proposed conservation measure in the EIS should be analyzed in terms of how much it costs and how much the grouse population will benefit. The following conservations measures should be included in this analysis: - Various methods of coyote control. - Various methods of raptor control. - Various methods to reduce danger from fences. - Various methods to reduce danger from vehicle traffic. - Various methods to protect grouse from disease. - Various methods to limit exposure to pesticides. Each method should be rated according to two measures: 1. Number of grouse saved per dollar spent on materials and labor. 2. Number of grouse saved per laborer-hour of time spent. When considering these measures, the EIS should analyze costs from three different viewpoints: 1. When the BLM employs the person doing the labor; 2. When the BLM contracts with a third party to do the labor; 3. When the BLM encourages ranchers or other partners to perform the labor. Ranchers' time and BLM funds are limited. The RMP should focus on conservation measures that provide the highest return for the time and money invested.	All	Both	emc0013RM
26.	The EIS should consider how proposed changes might impact other species that affect rangeland health and sage grouse populations:	All	Both	emc0013RM
27.	Anything that increases coyote or raptor populations will put more predation pressure on sage grouse.	All	Both	emc0013RM
28.	The relationships between the plant and insect communities are understudied. What insects do grouse eat? What plants to those insects eat? What insects pollinate those plants? What insects benefit big sage brush? What do they eat? What insects harm big sage brush?	All	Both	emc0013RM
29.	How important is the late-summer grasshopper population?	All	Both	emc0013RM
30.	When the ecosystem held fewer coyotes and raptors, the sage grouse were more abundant. The EIS should include an evaluation of whether this ecosystem was healthy. The EIS should acknowledge that attaining these numbers again will be impossible without eliminating the predators again.	All	Both	emc0013RM
31.	Predation is a big culprit in the decline in these birds. Naturally, your management plan gives little consideration to that fact. Biologist seem to consider predation some "good tool" to take the sick and the weak but that's not the facts. Predation is large and I believe that's a problem for populations.	All	Both	emc0025RM
32.	I am really concerned about the total devastation caused by the enormous wild fires over the past several years. I'm not seeing any of the usual animals that generally frequent these areas jackrabbits, cottontails, etc). Nor am I seeing the game birds that frequented the waterholes and scrub brush . As far as sage grouse are concerned , can they be re-introduced into their former destroyed habitat?	All	Both	emc0027GB
33.	Ironically, Sage Grouse numbers were highest during the 1920's and 1930's when livestock stocking rates were also at their highest numbers. Part of the reason Sage Grouse were doing well at the time, despite very intensive grazing, is that predators were kept in check. Today we have very little predator control. In fact in Colorado leg hold traps are illegal, and predator hunting is at an all time low. Predator control must be a part of any recovery plan.	All	Both	emc0032RM
34.	An issue that continually comes up when discussing sage-grouse conservation with other ranchers: Why do we not do something to control predators? Especially coyotes, as the coyote population is huge compared to what it was 20 - 30 years ago. Maybe it is just a coincidence, but all those years ago when the coyote population was much smaller, the sage-grouse population	All	Both	emc0043RM

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	was much larger. We all agree development from oil & gas, urban sprawl; etc has affected the sage-grouse population, but let's not ignore the effect of predators.			
35.	As a long time (40+ years) hunter/fisher/experienced outdoor observer in Colorado, the basic answer to the sage grouse population is simple: Predators, cycles and water supplies. But mainly Predators.	All	Both	emc0052RM
36.	Why so many Predators? a) Between all the rules of the USFS, BLM, DOW, State, it has become so complex that hunters of predators can never assume he/she is adhering to the regulations of each group. In other words "Keep it simple". b) Fewer people hunt predators because: Roads have been closed or are planned to be closed. There is an anti-hunting attitude exuded by the above groups. Cost of hunting (Equipment, travel, fees) Older hunters (60+) find previous access methods unusable and current long walking is difficult so they quit. The DOW statistics will substantiate fewer hunters as the old guys are not mentoring new young kids.	All	Both	emc0052RM
37.	The predator population has expanded and have learned to focus on drainages (where sage grouse are to be found).	All	Both	emc0052RM
38.	Studies indicated that predation was limiting sage grouse numbers, and their research suggested that low nest success from predation was related to poor nesting habitat. Most reported nest-success rates are >40%, suggesting that nest predation is not a widespread problem. Similarly, high survival rates of adult) and older (>10 weeks of age) juvenile sage grouse indicate that population declines are not generally related to high levels of predation. Thus, except for an early study in Oregon, predation has not been identified as a major limiting factor for sage grouse.	All	Both	emc0057GB
39.	Following the science must be part of this conversion. There will continue to be calls from livestock interests including Aphis Wildlife Services, for extensive predator control and closing hunting. While those strategies may be appropriate purely as stop gap measures in extreme cases, they address only symptoms. You cannot correct population declines resulting from habitat loss or degradation by closing hunting or killing predators, and to promote such an approach is patently dishonest.	All	Both	emc0058GB
40.	In preparing the EIS, the County recommends the BLM examine the historic and current impact of predation and natural low recruitment on the overall numbers of the sage-grouse as these impacts and how management can help these other factors is lacking in the GSGCM report. It has been suggested that as the United States federal policy changed over time from the early 1970's, certain tools were eliminated that were used to control certain predator populations such as coyotes, and habitat improvement project are now under-funded. It has also been suggested that because of these policy changes the SGS population numbers in the United States significantly decreased (as documented in research conducted by John W. Connelly, recognized sage-grouse biologist with the Idaho Department of Fish and Game, Blackfoot, ID) because the predators were no longer heavily controlled and other factors have negatively impacted habitats. This research suggests that the high population numbers reported in the late 1960s (showing approximately 350% of the 2003 population according to Connelly) were the result of significant predator control and that the normal population numbers were likely much less. In other words, the EIS should carefully review and present research that examines the rise and fall of the GSG populations with the rise and fall of predator control policy and habitat improvement/management to place rea listic population numbers and other population control factors into context, and not solely place the burden of protecting sage-grouse on the energy industry.	All	Both	emc0058RM
41.	As important as the institutional issue is, I will add this. Sage grouse is likely an "umbrella species" for many other high-dessert species and for the high-dessert ecosystem itself. That is, as an indicator of habitat quantity and quality it is a key species to	All	Both	emc0066GB

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	protect, and its protection and restoration by default would likely extend to other sagebrush-dependent species. But I delve into the technical with those statements, so I will leave it at that.			
42.	There are five listing factors under section 4 of the Endangered Species Act (64FR32726). We understand these are considered "threat factors". What level of analysis will be done during the EIS process to determine if any or all of these threats exist now or in the future? How specific might such a determination be? (i.e., district wide, species wide or ???) If any of the five are determined to be a threat on the District will they be fully analyzed to assure that they are addressed? Will a strategy be determined to eliminate an identified threat known to exist broadly but not existing on this district? If they are not analyzed will that be an indicator that a particular threat does not exist on the District? The five threat factors are listed as: a. A the present or threatened destruction, modification, or curtailment of the species habitat or range; b. Overutilization for commercial, recreational, scientific or educational purposes; c. Disease or predation; d. The inadequacy of existing regulatory mechanisms; e. Other natural or manmade factors affecting its continued existence.	All	Both	emc0071GB
43.	Population past EIS's have tended to focus on habitat and recognized that ODFW has the responsibility to manage populations of wildlife. Is there an opportunity to address populations and measures to enhance them along with habitat in the EIS? It would seem that even with great habitat on the majority of the District we have not accomplished anything without adequate or improved populations?	All	Both	emc0071GB
44.	Past EIS's have tended to focus on habitat and recognized that ODFW has the responsibility to manage populations of wildlife. Is there an opportunity to address populations and measures to enhance them along with distribution in the EIS? It would seem that even with great habitat on the majority of the District we have not accomplished anything without adequate or improved populations.	All	Both	emc0071GB
45.	Sound Science Must Recognize Local Experience - While scientists count leks and evaluate habitat potential, it is important that sound alternatives recognize both current conditions, and local experience regarding historic sage grouse activity. In reviewing the habitat mapping, it has been noted that some areas identified as habitat have not had documented grouse presence or activity in over a decade. Another factor that must be carefully weighed is the potential for the grouse to adapt to changing conditions and environment, and the influence and impacts of other environmental factors, such as predation.	All	Both	emc0071RM
46.	Another disturbance not specifically identified or addressed in existing or draft RMPs is the impact that natural gas flaring poses to greater sage-grouse. Flaring is believed to pose a threat from several standpoints. Noise associated with flaring may cause disturbance and increased predator effectiveness. Sound may directly interfere with lek display vocalizations and harmonics. Light from flaring can extend far beyond the immediate pad area, and this increased availability of light may provide increased opportunity for predation at times when natural light is normally not available. Light may also directly preclude grouse from using lek sites or other seasonal habitats.	All	Both	emc0072RM
47.	While Greater Sage-Grouse depend on livestock troughs and tanks for water, they also can drown while attempting to drink or bathe in these structures. It is a common practice to temporarily shut off water to tanks and troughs when livestock are moved, forcing Greater Sage-Grouse and other wildlife that have become dependent on that water supply to find alternative-often distant-sources or perish. This is particularly harmful during the warmest months when Greater Sage-Grouse are rearing young. We believe that preventing wildlife fatalities at water troughs not only conserves Greater Sage-Grouse, but also helps maintain the clean, uncontaminated water that is critical for any livestock operation. Decaying animal carcasses greatly diminish water	All	Both	emc0074GB

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	quality.			
48.	The need for wildlife escape structures (also called wildlife ramps or bird ladders) in troughs and tanks has been documented. Most livestock water troughs were not designed or installed with Greater Sage Grouse in mind, and they seldom include a means of escape for wild animals that fall into the water while attempting to drink or bathe. These animals drown unless a properly-designed and well-placed escape structure is available. Wildlife drownings increase when alternative water supplies are unavailable and escape structures are absent, especially when water levels are lowest and during periods of drought, high temperatures and wind. Tragically, some of the most common attempts to provide wildlife escape structures do not work or are unreliable. Effective wildlife escape structures are easy and inexpensive to build and install and can eliminate Greater Sage-Grouse mortality in water troughs and tanks. Properly designed and installed, these structures also improve livestock health by maintaining clean water that's uncontaminated by drowned Greater Sage-Grouse or other wildlife.	All	Both	emc0074GB
49.	Recommendation #4 - We recommend that all troughs and tanks with vertical or nearly vertical sides be modified with escape structures and that high water levels in these troughs and tanks be maintained throughout the year.	All	Both	emc0074GB
50.	In some cases, predation may also substantially affect sage-grouse populations, and local predator control measures in certain areas, such as known nesting areas, may provide substantial benefits. Focusing on conservation measures that address these types of impacts will provide a beneficial option whereby sage-grouse habitat would be protected without substantial adverse effects on economically-productive activities. Improving the quality of existing habitat should also be a high priority, as better habitat will support more birds and facilitate the inclusion of other land uses across the broader landscape.	All	Both	emc0084GB
51.	Predation control through either poisoned bait (eggs) or small bore firearms can be immediately effective. Fire control through free-market grazing decisions of cattlemen or sheep growers can be effective in protecting sage grouse within one climate season. Bureaucratic habitat control will take no less than multiple budget cycles, and personnel reviews, before any agency even begins to be an effective advocate for the benefit of sage grouse.	All	Both	emc0087GB
52.	The apparent agency refusal to seriously consider predation and fire in the survivability of the sage grouse assures not only the endangered species listing of the sage grouse, but in fact the actual endangerment of the species. Extinction will not be the fault of the rancher nor the hunter nor the industrial worker. Sage grouse extinction will be the fault of the politically-correct scientist and the politically-correct bureaucrat.	All	Both	emc0087GB
53.	While research indicates that habitat destruction is the greatest cause of the decline in the numbers of Sage Grouse, the role of predators is not far behind. Not only does our ranching operation control coyotes, but we get assistance from USDA APHIS in order to control crows and ravens. Corvid numbers have increased greatly in this area in the past decade, and all research cites them as major predators of grouse eggs.	All	Both	emc0088RM
54.	In addition to habitat improvement, I believe there is a need to reduce predators and eliminate the hunting of Sage Grouse	All	Both	emc0091GB
55.	I believe where required there is a need for predator control.	All	Both	emc0091GB
56.	I believe we need more genuine scientific studies on all of our wildlife populations.	All	Both	emc0091GB
57.	There may have been a slight decline after the BLM killed many sage hens by poisoning crickets. They most likely are recovering and need no help from the BLM.	All	Both	emc0098RM

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58.	The effects of predation of sage grouse must also be analyzed. Several predator type animals will predate on greater sage grouse, including coyotes, red fox, raccoons, bobcats, badgers, striped skunks, weasels, eagles, and other raptors. The preliminary results from year one of a study in Wyoming's Big Horn Basin, located in north-central Wyoming, shows a majority of failed nests were due to predation. This study has been active for only one year but the results do show predation can have serious impacts on sage grouse. More work must be done in other areas of Wyoming to determine the effects of predation on sage grouse.	All	Both	emc0106RM
59.	Of the listed threats to Sage Grouse and habitat is predation of equal weight as humans, number 9 with relative rank of 30. Within our region there are numerous predators that are having an impact on the birds, coyotes, fox, magpies, crows, hawks, eagles. The NEPA process needs to include the cumulative affect of predators, especially birds. During the past 50 years while the sage grouse numbers have declined, the construction of aerial utility lines in the rural areas have proliferated. These provide roosting locations for predators especially during the mating period. What are the cumulative affects of these predators on the population? While the placement of underground utilities is discussed as BMPs, is it the impact the aerial line or the predator that uses it?	All	Both	emc0112GB
60.	The EIS should look at the issues surrounding sage-grouse predator control. If predator control is now being used, or proposed to be used in given areas, there must be an examination of the positives and negatives associated with that. Although predator control could conceivably increase sage-grouse populations, there are several issues that are tied to predator control in general and perhaps to control of certain predator species in particular.	All	Both	emc0121GB
61.	Sir, I have been involved with the sagegrouse study for 5 years, we know what kills them. Until we have a predator program to thin out the crow ravens and the coyotes they will never come back. If you find a raven nest look below it and see all the eggs they have taken to feed their young. We counted 18 under one nest. The coyotes flush the hen then search for the chicks	All	Both	emc0123GB
62.	Two examples of range management that supports all wildlife, not just the sage grouse are found on the Julian Land & Livestock Co. in Kemmerer WY. and the Deseret Land & Livestock Ranch in Rich County UT. An entrenched bureaucracy with a "My way is the only Way" is the greatest detriment to viable habitat for all wildlife. The BOA supports all wildlife to be enjoyed for all forms of recreation as well as hunting. Number based management is a bad way to manage any game species due to manipulation of data in far too many cases. The current debate on the wolf recovery issue and who has the numbers and what the numbers mean as well as how large a number is sufficient to delist a species is but one example. The second paragraph concludes with the idea that the Federal land management policies should affect privately owned habitat. Current management practices of private property land owners is far superior to anything the Federal managers have tried. The heavy hand of the Federal Government must stay off private lands. Private land owners in Southwestern Montana are providing superior habitat and security to all wildlife pushed off Federal lands by pine beetle, conifer encroachment into meadows and pressure from predators, most notably the wolf.	All	Both	emc0133GB
63.	Work on Predator concerns.	All	Both	emc0137GB
64.	BLM has explicitly stated in its public scoping materials that the resource management plan and land management plan amendments/revisions will be limited to making land use decisions specific to the conservation of greater sage-grouse habitats. The scoping notice did not identify predation or predation management as an issue or a component of sage-grouse conservation. Rather the FWS and BLM identified habitat conditions as the most significant range-wide threats to greater sage-grouse. However, predation was ranked 13th out of 19 potential causes for sagegrouse declines and was followed by disease (BLM and FS National Greater Sage-Grouse Planning Strategy, January 2012). In circumstances where predation has been identified as limiting local	All	Both	emc0138GB

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	sage-grouse populations, predation management may provide relief or benefit to local sage-grouse populations either alone or in combination with other actions, such as habitat improvements. Of the 19 identified threats to greater sage-grouse, predation may be one of only a few threats that could be managed to provide more immediate local relief while longer term habitat improvements and land use changes are made and begin to show results. Predation management may provide the time needed to maintain a healthy core sage-grouse population while habitat is recovered or expanded which could ultimately result in the ability for the sagegrouse population to expand.			
65.	We understand that BLM's management authorities may limit the ability to initiate predation management since sage-grouse are currently managed by the states. However, since state wildlife management agencies and FWS are cooperating in BLM's NEPA process to conserve sage-grouse, BLM planners and cooperating agencies should use this venue to collaborate in more comprehensive sage-grouse conservation planning and analyze issues outside of its normal jurisdiction such as predation and disease threats. At a minimum, defining the inter-relationships between BLM and other land managers, state wildlife management agencies, FWS and others, including APHIS-WS, would show how different conservation roles and actions may assist to enhance sage-grouse. If sage-grouse were to become listed under the ESA, jurisdictional roles would change. This possibility should be disclosed and analyzed as this scenario may provide useful information to the public and stakeholders for sage-grouse conservation.	All	Both	emc0138GB
66.	During the 1950s, 1960s and 1970s, sage grouse populations in lake County were high due to efforts of the Dept of Agriculture's government trappers that kept predators (such as coyotes) at bay and allowed sage grouse to breed and raise their broods successfully. During the same period certain predatory and scavenger avian populations were low. Raptor, raven, and crow populations were affected indirectly by poisons used in some predator control programs using cyanide and 1080.	All	Both	emc0139GB
67.	Currently, sage grouse populations must now contend with predation from coyote, raptor, raven, and crow populations that have increased dramatically since the 1970s. Predators teach their young how and where to find food. Sage grouse leks are extremely vulnerable to predation since the locations of the leks are passed on to each successive generation of predators. Considering the fact that most sage grouse nest within close proximity of the leks, it doesn't take scavenging predators such as coyotes, ravens, and crows very long to inflict heavy losses. "losses of sage grouse nests and young to predation are probably the most significant factor in determining annual recruitment" (Allred 1942, Autenrieth 1981, Batterson and Morse 1948, Gill 1964, Patterson 1950). In fact, a study in Oregon showed that the greatest single limiting factor of sage grouse was predation by ravens (Batterson and Morse 1948) Badgers and Richardson ground squirrels are also efficient predators (Keller et al. 1941).	All	Both	emc0139GB
68.	In order to achieve a successful breeding season a predator reduction/disruption program must be instituted in and around leks during the breeding and brooding periods. No amount of vegetation cover will protect breeding sage grouse since the act itself is performed in open areas.	All	Both	emc0139GB
69.	Developing water sources in the more arid areas to reduce predation is critical. Predators congregate around water sources. Having more choices to water keeps predators guessing and reduces predation.	All	Both	emc0139GB
70.	Managed livestock grazing programs have the potential to maintain habitat diversity and quality for greater sage-grouse. For example, research shows that grazed lands produce forb growth and are preferred to nongrazed lands by greater sage-grouse (Evans 1986). Additionally, research shows that nesting cover (under canopy vegetation) remains adequate with up to 40 percent utilization levels and is not substantially diminished until later in the grazing season, thus indicating that a variety of grazing regimes	All	Both	emc0140RM

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	may be implemented without adversely affecting nesting (France et al.) In areas of high production, utilization in excess of 40 percent will still result in adequate nesting cover. Grazing systems should be implemented and managed to comply with the respective resource area management and forest plans. Site-localized, long-term trend monitoring should be the basis for determining compliance with management plans. Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the greater sage-grouse range, are not effective tools for adaptive management. Adequate residual plant cover must be determined by short-term and long-term monitoring, which includes accounting for various environmental conditions.			
71.	Predator Control The EISs and SEISs must analyze the impact of predation as a leading cause of greater sage-grouse mortality, and must analyze the benefits that predator control efforts have provided to greater sage-grouse populations. Numerous studies indicate that predation by eagles, foxes, coyotes, badgers, ravens (a major predator that is now a protected species) and others is a leading cause of greater sage-grouse mortality in the West. In a BLM funded study by Montana Fish, Wildlife and Parks, depredation by nest predators was the primary cause of nest failure in both 2010 and 2011. Almost 90 percent of hen mortality was attributed to depredation. The report states, "We did not observe any direct negative impact of livestock on nesting grouse (e.g., trampling of nests)" (Foster, 2012). Preliminary research conducted in Wyoming shows that predation can account for up to 80 percent of greater sage-grouse chick mortality, and that predator control efforts are a crucial component of greater sage-grouse conservation (Orning-Tschampl et al., study pending). Predation of nests (eggs) and juveniles is a serious problem for greater sage-grouse populations; this is partially habitat-related and partially a matter of predator levels and distribution; however, regardless of the quality of habitat, some predators exist today at exponentially elevated levels, and non-indigenous predators (such as the red fox) have been recently introduced into many greater sage-grouse ranges (Baxter et al. 2007).	All	Both	emc0140RM
72.	The issue of predation merits further evaluation and, as it varies from area to area, is best addressed at the local level. EISs and SEISs should recognize the importance of predation to grouse numbers and provide adequate authority and flexibility to local land managers to use all available control methods.	All	Both	emc0140RM
73.	When the population level of a wildlife species is low and can no longer compensate for predation, pressure from predators then becomes the single most limiting factor of survival for that species. The sage grouse is at that critical stage. Iron County realizes that the federal land agencies do not have the authority to manage predation, and habitat rests with the state wildlife agencies and USDA, Animal Plant Health Inspection Service, Wildlife Services (APHIS WS). However, we encourage a lengthy discussion on this subject to recognize the impacts predation is having on sage grouse. It will also be important that recommendations are made in the planning strategy to state wildlife agencies and APHIS WS on predator management in sage grouse areas. If predators, primarily ravens, are not controlled to relieve the pressure being placed on sage grouse, habitat enhancement project will be of no consequence to their survival. State wildlife agencies seem to have an aversion to recognizing this fact even after numerous research studies in all the western states supports selective removal of predators for sage grouse survival.	All	Both	emc0142GB
74.	The County supports the work of state and federal wildlife agencies to protect the sage grouse hatching areas through vigorous predator control. Appropriate monitoring by these agencies have established that predators such as coyotes, ravens, hawks, eagles all pose a threat to the sage grouse and are major factors in the decline of the sage grouse populations.	All	Both	emc0160GB
75.	Sirs, I worked on the sage grouse study . Here is the results of one study done in 1997. We radioed 9 hens 1069 made 2 attemps to hatch hatched 13 chicks from last attempt. I chick survived. 0.525 made one attempt ravens got her eggs. 1.559 hatched 13 eggs	All	Both	emc0162GB

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	only 5 chicks raised. 1.306 hatched 12 chicks 5 survived. 0.951 made one attempt and was killed on nest by coyote. 0.504 hatched 13 eggs 2days later only had 2 chicks. We saw raven flying off with one chick. 0.475 was killed on nest by avian predator. 1.017 made 3 attempts to hatch and was killed on nest by a coyote. 1.571 was killed on nest. Total attempts to hatch was 12 total eggs hatched was 51 total chicks that survived was 13. We found a ravens nest and found 18 sage grouse egg shell below it. So we know the ravens and coyotes are really doing some damage on the sage grouse. If we are ever going to get them to rebound we need to do some predator control. My good friend and trapper killed over 50 coyotes that winter. He can no longer hunt or trap as he is in bad heath. But I would hope we could get other trapper to help. By the way the study I did was in Shoshone Basin			
76.	Predator control must be implemented for sage-grouse to recover. Predator control should target mammalian predators and avian predators including: coyotes, bobcats, foxes, raccoons, skunks hawks, crows, raven and any other predator determined to negatively influence sage grouse populations. Of course predator control efforts should be conducted in accordance to local laws and regulations.	All	Both	emc0165GB
77.	Most importantly, any projects implemented should be conducted with the goal to improve multiple wildlife species and interests.	All	Both	emc0165GB
78.	What is the problem with sage grouse. 1.The Federal Government protects raptors eagles, hawks, falcons, owls, and some carrion(and egg) eating birds 2.The Federal Government bans the poison 1080 and others, that kill predators, coyotes, bobcats, raptors, skunks, foxes, raptors, carrion eaters etc. For obvious reasons. 3.The Federal Government attempts to ban wildfire , and almost eliminates land treatments , chaining, prescribed fire etc. 4. The Federal Government reduces livestock numbers.	All	Both	emc0167GB
79.	Protection should be ensured not just for sage-grouse, but for other sage-grouse obligate species (Sage Sparrow, Sage Thrasher, Brewer's Sparrow, pygmy rabbit, etc.)	All	Both	emc0169GB
80.	Predators have a huge impact on sage grouse chick survival. I believe raptors of all stripes are hard on them, but especially ravens. I would like to see some form of raven control take place, and am offering my ranch as a place to use as an experiment. I would be open to anything from a Department of Fish and Wildlife supported hunt, to a graduate student placing poisoned eggs. I would also like to see some agency place a bounty on coyotes during critical brood rearing times. Eliminating perches is a great idea.	All	Both	emc0172GB
81.	Predation needs to be considered as a reasonable factor on the impact to sage grouse populations in the EIS. Based on observations by numerous local ranchers, the impact is a critical factor to consider. Where studies are lacking, the EIS should take into account what is available and give serious weight to the ODFW plan that states a rigorous data collection is needed in the sampling schemes for lek counts. The same is true for many areas of the sage grouse habitat and other wildlife issues. Discussing science is not the same as doing science. The basic principles of doing science requires a good study design, rigorous data collection, and analysis. • Population ecology—Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some level of rigor to the data collection. (Oregon Dept. Fish and Wildlife, April 2011. Greater Sage--Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat). • Survival of sage-grouse is typically high with more than approximately 60% of a cohort surviving from year to year. • Of the 40% of a grouse population that succumbs to mortality during a year predation accounts for approximately 85% of reported non-hunting mortalities and 79% of nest failures (Bergerud 1988). • Specifically, predation on nests and young chicks can be high and affect populations (Gregg et al. 1994, Aldridge and Brigham 2001, Schroeder and Baydack 2001,	All	Both	emc0179GB

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	Coates 2007). However, few studies have indicated that predation is a major limiting factor to sage grouse. • In Idaho, predation was the most common cause of death for radio-marked sagegrouse (83% of males and 52% of females) in a hunted population (Connelly et al. 2000a) where apparent survival was 71 and 68% for male and female sagegrouse, respectively. Coyotes (Canis latrans), badgers, (Taxidea taxus), bobcats (Felis rufus), and several species of raptors are common predators of juvenile and adult sage-grouse throughout most of sage-grouse range (Hagen 2011). Additionally, coyotes, badgers, common ravens (Corvus corax), and black billed magpies (Pica pica) commonly prey on sage-grouse eggs (Hagen 2011).			
82.	Some manageable issues, ideas and options that should be addressed in and EIS can be broken down into the following principal points. 2. Predation	All	Both	emc0200GB
83.	Predation is an increasing problem throughout the west. I have been seeing a noticeable increase in coyote, fox, raccoon and skunk populations. The increase in the coyote and fox populations is I believe largely due to the increasingly bad public opinion of trapping that historically helped control these populations at no cost to the taxpayer. The raccoon and skunk population increases may be natural, but are having devastating effects on all ground nesting birds. Programs to improve public perception of the important role trapping plays in controlling predation of sensitive species at no cost to the taxpayers and I or the government would be a good first step to remedy this over the long term.	All	Both	emc0200GB
84.	The conservation of rangelands for livestock production is extremely important, not only to the sustainable production of food and fiber for the United States and worldwide markets, but also to providing quality habitat to support wildlife populations.	All	Both	emc0202GB
85.	From the mid 1970's to now there has been a great deal of change. The predator control has slacked off. The coyote control is down due to most of the poisons are off the market,the liability of workers carrying fire arms on the job and the price for the pelts is down. The number of coyotes has risen but goes in cycles. In 1972, a revised Migratory Bird treaty with Mexico was signed that protected the predators (hawks, ravens, crows, magpies and eagles) and other birds. Since then the hawks and eagles have steadily increased. Where we have the largest explosion in population is in the crows, ravens, and magpie numbers. These predators and or scavengers will get all sizes of sage grouse from eggs, chicks, young flyers and adult birds. On any spring or summer day you can see 5 to 20 hawks flying and 40 to 50 crows, ravens and magpies. They have been around all spring and I would bet that they have been feasting largely on sage grouse. The coyotes are also looking to feed on them if they can find and catch them. Other predators are skunks, badgers, ferrets, and ground squirrels.	All	Both	emc0207GB
86.	I am also concerned with the way the habitat guide lines are interpreted and presented. I admit that I do not know what all the recommendations are but when I read them it sound like the ground will only be managed for the sage grouse. There are other wild life out here living in the same area. Some of the wild life have conflicting needs so both cannot have the optimal habitat but they still live in the same ecosystem. We cannot manage the land for all animals at their optimal habitat. We need to find a middle ground where all animals (wild life and livestock) can flourish.	All	Both	emc0207GB
87.	Critical Wildlife habitat for native species (summer and winter) needs to be identified and protected. Again, land trades and purchases should be used to increase these areas and provide more protection.	All	Both	emc0217GB
88.	In addition, when predator control decreased sage grouse numbers declined as well. Predators have always been a problem for sage grouse. They are keen to find nests with eggs or young birds that cannot protect themselves.	All	Both	emc0233GB
89.	The section on Treatments to Increase Forage for Livestock/Wild Ungulates, page 16 is very single-species oriented and does not uphold the principles of multiple-use management. The socio-economic impacts of these conservation measures should be	All	Both	emc0239GB

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	analyzed in the EIS. In addition, many of the sagebrush ecological sites can only be maintained through periodic disturbance, releasing the perennial grasses and forbs before they become too scarce from competition with shrubs, and so scarce that non-native invasive can establish on the site. Treatments of sagebrush are not always intended to increase livestock forage, but are useful ways to maintain the integrity of the ecological site.			
90.	BLM has indicated that the findings of the Sage-grouse National Technical Team's report "A Report on National Greater Sage-Grouse Conservation Measures" will be relied on to establish conservation measures. We are concerned that this report, which is supposed to represent the best science available, fails to mention three significant causes of sage-grouse mortality: hunting, predation and disease (see page 6 of the report). The report does consider the impacts of Wild Horse and Burro Management on sage grouse (see Page 18) but fails to look at the impacts associated with hunting, predators [wildlife] and disease. By failing to look at the entire picture, the findings of this report become suspect.	All	Both	emc0242GB
91.	Sage grouse mortality via hunting, predation and disease must be analyzed in the plan amendment process in spite of the failure of the national technical report to address these issues.	All	Both	emc0242GB
92.	The BLM should discuss predator control and limitations on hunting with state wildlife managers as more effective ways to increase sage grouse populations.	All	Both	emc0242GB
93.	Population augmentation is a wildlife management tool that should be considered for sage grouse in local areas where the need exists.	All	Both	emc0242GB
94.	Thus, intensive livestock management which diminished the frequency and size of wildfires, and concerted predator control which greatly reduced GSG loses to these killers, are management actions in the Great Basin that seem to be highly relevant to the biology of the GSG and help explain the trajectory of their populations over time. As shown in Figure 1 on page 17 herein, it is reasonable to assume that a return to effective management to increase livestock grazing levels, reduce fire fuel loads and wildfire impacts, and increase predator control would result in another significant upward trend in GSG populations. In contrast, proposed GSG conservation measures to provide heavier cover levels through further livestock grazing reductions, and the lack of conservation measures to address ever increasing predation levels, are a prescription to assure that GSG populations will ultimately decline. Heavier cover for GSG translates to higher fire fuel loads across the landscape, and substantial fuel loads make large-scale wildfires inevitable in many sagebrush communities. Repeat burns increase the likelihood that plant communities will shift toward cheatgrass dominance, which in turn increases wildfire frequency, eliminating the ability of sagebrush communities to re-establish. Thus, conservation measures that intend to benefit GSG by providing them with more hiding cover will ultimately harm the species by converting significant swaths of existing habitat to annual grasslands that provide no habitat value for GSG. This will concentrate the remaining birds in an ever shrinking area, making them more vulnerable to poorly controlled predator populations	All	Both	emc0251GB
95.	If regulatory/policy controls to minimize human disturbance have failed to allow GSG populations to flourish within the vast wilderness areas and other nationally designated conservation areas, then it is unreasonable to apply such draconian control measures to broad landscapes beyond the boundaries of these areas in the vain hope that such regulation will somehow work in other locations. To implement regulatory mechanisms that are certain to severely interfere with other valid existing uses of the landscape and negatively impact local and regional economies in the face of evidence that such mechanisms did not reverse the plight of the GSG in these nationally designated areas would be unreasonable, irrational, and counter-productive. Instead, if the	All	Both	emc0251GB

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	minimum effective population of GSG necessary to protect the species from extinction cannot be supported within such nationally designated areas, then management practices that were in place when greater sage-grouse populations dramatically increased from the mid 1800s to early 1900s need to be identified and implemented again in other areas, including increased livestock grazing to reduce wildfire fuel loads, and concerted predator control practices			
96.	Enhance Current Populations Alternative Given the fact that current GSG populations exceed the minimum effective breeding population by 70 to 107 times, it is clear that GSG are not at imminent risk of extinction, and therefore do not legally qualify for listing as "endangered" under the ESA. The FWS Findings express concerns regarding rapidly declining GSG populations between the late 1960s and late 1980s, and continued downward population trends (although at a slower rate) from the late 1980s to the present. The FWS Findings fret that such downward trends in GSG populations may threaten the species with extinction at some point in the future. Given the recent (1985 – 2007) rate of decline of 1.4% annually (FWS Findings, 3 page 13922), it would take 300 to 330 years for the current greater sage-grouse population (350,000 to 535,000 birds) to shrink to the minimum effective population (as high as 5,0000 birds). Theorizing about what might happen three centuries from now reaches well beyond the foreseeable future. Thus, the FWS Findings expression of concern about long-term outcomes from the continuation of recent GSG population trends does not rise to a determination that the species is threatened with extinction in the foreseeable future. A concern that populations may reach levels small enough to put them at risk of extinction at some point in the future does not meet the legal requirement to allow listing under the ESA unless the risk is likely in the foreseeable future. Given current circumstances, any such risk for GSG is likely 300 or more years distant, so the species does not legally qualify for listing as "threatened" under the ESA at this time. Nevertheless, it is reasonable to consider an alternative that would facilitate an increase in GSG populations, so long as that alternative does not negatively impacting existing socioeconomic uses occurring on BLM and FS administered lands. An analysis of the past management history within the Great Basin indicates that GSG flourished when livestock grazing levels were significantly higher than they are now. During this same period, large wildfires in the region were very infrequent (likely due to lower wildfire fuel levels as a result of close grazing), and concerted predator control measures were practiced. These management actions could be put into practice again to benefit GSG without harming the existing socioeconomic climate, but rather enhancing it. In fact, it is reasonable to argue that the FWS Findings get it wrong when they conclude that there is a lack of regulatory mechanisms in place to protect the GSG. Instead, many of the regulatory mechanisms currently in place are harming the species. For example, regulations restricting livestock numbers and use levels increase fire fuels across the Great Basin, and these regulations have resulted in a dramatic increase in large wildfires in the region in recent decades, which has destroyed GSG habitat to the detriment of the species. Repeated fire has led many sagebrush communities to convert to cheatgrass dominance, which assures that the habitat will remain unfit for GSG into the foreseeable future. Rules restricting predator control, regulating the use of poisons and baits, and protecting ravens have resulted in excessive GSG loses due to predation. Whenever a species like the GSG with a relatively low reproduction rate (FWS Findings, 3 page 13916) loses the vast majority of its eggs to predation, and can trace more than 80% of the mortality of those individuals that manage to hatch to predation (FWS Findings, 3 pages 13930, 13971, and 13972), its populations can be expected to decline. Again, it appears that existing rules are harming GSG populations, not a lack of adequate rules.	All	Both	emc0251GB
97.	is reasonable to analyze an alternative to eliminate existing regulatory/policy mechanisms that are harming GSG, or replace them with rules that again implement management practices that allowed the species to rapidly increase in the past, at least within the	All	Both	emc0251GB

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	Great Basin. Because current GSG populations greatly exceed the minimum effective population, any management alternative that would stabilize or increase the current population level would eliminate any perceived justification to list the species under the ESA. However, given the multiple-use mandates applicable to BLM and FS administered lands, consideration and analysis of such an alternative to help GSG populations is only reasonable if it does not negatively impact other valid existing uses. An alternative to increase livestock grazing to reduce fuel loads and minimize wildfire impacts, and to return to concerted predator control practices is reasonable because it would benefit GSG without harming the existing socioeconomic climate, but rather enhancing it			
98.	Fences are a huge problem for sage grouse. Studies have shown that every mile of barbed-wire fencing causes a certain number of sage-grouse deaths, every year, due to sage-grouse hitting the wires. This is a continuous loss to the population. Yet the BLM (and the Forest Service, for that matter) continue to build more fences. The only reason for building more fencing is to attempt to influence the movements and reduce the damage caused by livestock. The option of reducing or eliminating livestock use of the public's lands is seldom considered. Sometimes "jack-leg" fencing is used in place of barbed-wire fencing. While wooden fences do not kill sage-grouse, sage-grouse are still threatened by them, as raptors use them as places to perch and pounce on passing prey. Also, cattle use fence-lines as trails, and these wide trails are also used by coyotes, foxes, and other predators, thus making it easier for them to nab sage-grouse chicks.	All	Both	emc0268GB
99.	Understanding the focus and limitations of the process under discussion here, at some point, through some mechanism, recognition of the increased role natural predation has played in the last several decades of Greater Sage Grouse population fluctuations, cycles and overall population reductions should be attempted.	All	Both	emc0270GB
100.	Fences will also cause similar adverse impacts to sage-grouse and sage-grouse habitat. Fences fragment habitat as sage-grouse seek to avoid areas close to fences, likely to avoid predation, as fences provide cover and perches for potential predators. Sage-grouse may also collide with fences, resulting in direct mortality. Finally, similar to powerlines and communication towers, fences threaten to spread invasive plants and noxious weeds, threatening the integrity of the habitat for sage-grouse.	All	Both	emc0276GB
101.	Predation is a natural threat common to all upland game birds, including the greater sage-grouse. Predators include animals that consume sage-grouse as well as those that will consume sagegrouse eggs. Although there are many predators that will consume sage-grouse, none specialize on the species. Sage-grouse have co-evolved with a variety of predators, and thus have adapted biological and behavioral strategies for avoiding significant mortality effects.	All	Both	emc0276GB
102.	Sage-grouse are perhaps most vulnerable to predators during nesting, when they remain on the ground to protect their nests. Nests with greater grass and forb cover, however, show a decrease in predation rates. Nesting success is positively correlated with the presence of big sagebrush and sufficient grass and forb cover, and thus nesting success is greater in unaltered habitats versus altered habitats. Generally, studies have found that low nest success due to predation is ultimately related to poor nesting habitat	All	Both	emc0276GB
103.	An unnatural increase in predator populations may threaten sage-grouse survival rates. Landscape fragmentation, habitat degradation, and human encroachment all have the potential to increase predator populations. For example, infrastructure that increases suitability for ravens may limit sage-grouse populations. Potentially as a result of land-use practices that favor high predator abundance, raven abundance has increased as much as 1500 percent in some areas of western North America since the 1960s, and thus have become an increasing threat to sagegrouse persistence.	All	Both	emc0276GB

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104.	The Fish and Wildlife Service concluded that where habitat is not limited and is of good quality, predation is not a significant threat to the species. However, the agency remains concerned that continued landscape fragmentation will increase the effects of predation on this species, resulting in more significant effects on sage-grouse productivity and persistence.	All	Both	emc0276GB
105.	As the climate warms, associated climate impacts such as shifts in timing and amount of precipitation and changes in seasonal high, low, and average temperatures may significantly alter distributions of individual species and ecosystems. For example, some species that can only survive in cooler weather may be pushed further north or higher in altitude to seek cooler climates. This shift may affect all plant and animal species, as the equilibrium of predator and prey species shifts and the natural balance of ecosystems is altered.	All	Both	emc0276GB
106.	A better use of money would be to actually improve the range where the birds live. But there will be NO ANSWERS OR IMPROVEMENT IN THEIR HABITAT UNTIL THE PREDATORS ARE CONTROLLED. The wolves, the coyotes and crows or ravens are devastating to success of these ground nesting birds. It is sickening to watch a crow or coyote steal the eggs while the mother bird chirps her complaint, but to no avail. The predator always wins.	All	Both	emc0279GB
107.	The EISs and SEISs must analyze the impact of predation as a leading cause of greater sage-grouse mortality, and must analyze the benefits that predator control efforts have provided to greater sage-grouse populations.	All	Both	emc0284GB
108.	4. page 6, Goals and Objectives, paragraph Goal. The focus is on "conserving, enhancing or restoring the sagebrush ecosystem." There are other factors that directly or indirectly affect sage-grouse numbers; i.e. predation. It is common knowledge that crows and ravens destroy sage-grouse nests. Consideration should be given to having a bounty on crows and ravens for 'X' number of years to determine the benefit (increased successful nesting) for sage-grouse. With a successful hatch sage-grouse chicks are subjected to increased predation by coyotes and many other mammals. Even if temporary, an extended hunting season and/or bounty should be considered for 'X' number of years and a determination made of the increased survival rate of sage-grouse chicks. SRCA feels there needs to be more focus on predation. Studies have found interesting results in regards to sage-grouse predation. The history of predator control in Elko County, Nevada shows the direct impact of predators in relation to sage-grouse populations. (McQuivey, 2003)	All	Both	emc0289GB
109.	Predators have been on the increase in recent years. Ravens are known to destroy nests. Predator control should be used as a tool. As a child and young adult, I never saw ravens here.	All	Both	emc0292GB
110.	Please remember these landscapes often provide essential habitat to multiple species-some of which require old-age sagebrush canopies and others requiring early seral conditions. A well-managed landscape is managed not to maximize value for anyone species (whether cattle or sage grouse) but rather maximizes overall value by 'optimizing', or maintaining viable habitat for multiple species (including wildlife and livestock, Oanvir et al 2005).	All	Both	emc0303GB
111.	Cattle, mule deer, pronghorn, pygmy rabbits, sagebrush passerines, cutthroat trout and cattle can all thrive. This type of rotational grazing strategy (providing rest for recovery) meets all four rangeland health guidelines, and provides a 'drought reserve' in that if needed pastures planned to be rested season-long may be grazed late in the year (during dormancy) if drought occurs.	All	Both	emc0303GB
112.	The EIS must address the role of predators on species population and alternatives for a variety of enhanced predator control efforts.	All	Both	emc0310GB
113.	The concept of "connectivity" could be interpreted in such a way so as to expand priority habitat areas. The EIS must define "connectivity" and the specific parameters for determinations and boundary FS- establishment. Corridors should not be used as	All	Both	emc0310GB

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	de facto priority habitat areas.			
114.	The EIS should specifically analyze the natural cycle of wildlife populations and how they relate to sage-grouse in the western U.S.	All	Both	emc0310GB
115.	The EIS must define "migration or connectivity corridors". How will the agencies identify such corridors especially in light of the fact they may be broken and fragments by natural processes such as pj woodlands or other non-anthropogenic activities.	All	Both	emc0310GB
116.	Any EIS or SEIS must also explicitly recognize the following points: The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival.	All	Both	emc0315GB
117.	Other Issues to Be Considered • Balancing of Species Another aspect that BIM must consider is the balancing of various species. While it is understandable that BIM's focus is on sage grouse, some of the policies being enshrined in the IMs and NTT report recommendations will result in pitting the sage grouse, which is not yet listed, against other endangered species that are. For example, pinyon-juniper habitat, which is criticized by the new policy, is valuable for other endangered species such as some species of raptors and hawks. While BIM is right to implement policies that are helpful in avoiding the listing of sage grouse, the agency must also be mindful that its policies can have unintended negative consequences for other important species. BIM must include a detailed discussion in its EIS regarding how it has evaluated and balanced such considerations.	All	BLM	emc0331GB
118.	VI. BLM and USFS Must Evaluate a Reasonable Range of Alternatives In light ofthe different reasons for sage-grouse habitat decline from region to region, and the fact that there remains significant sagebrush habitat in Wyoming and Nevada, each sub-regional EIS should carefully evaluate a reasonable range of alternatives to the conservation measures and regulatory mechanisms proposed in the NTT Report. Some of the contemplated measures may not be necessary or effective in each region or sub-region. Examples of such alternatives include, but are not limited, to the following: C. The Better Predator Control Altemative For regions and sub-regions where predation is a major factor affecting sage-grouse populations, the EIS should evaluate a Better Predator Control Altemative to assess the impacts that would be associated with implementing more effective predator control measures.	All	Both	emc0335GB
119.	After much study, we found that Sage Grouse did not seem to be on the decline in our area. The number one factor our studies showed that made them decline slightly in numbers was predators such as racoons, red fox, skunks, crows, and hawks.	All	Both	emc0336GB
120.	Research has found that greater sage-grouse can be applied in conservation planning as an "umbrella species," meaning one whose "conservation confers protection to a large number of naturally cooccurring species" For example, Rowland et al. found that "some species, especially sagebrush obligates such as pygmy rabbit and Brewer's sparrow, may receive substantial conservation benefits if habitats for sage-grouse in the Great Basin are the focus of conservation planning and restoration." Other species of conservation concern that would benefit from greater sage-grouse conservation, just in the Great Basin, include: · Wyoming ground squirrel · Pygmy rabbit · Vesper sparrow · Sage thrasher · Sage sparrow · Merriam's shrew · Sagebrush vole · White-tailed jackrabbit · Brewer's sparrow · Gray flycatcher · Pronghorn · Green-tailed towhee · Northern grasshopper mouse · Dark kangaroo mouse · Western burrowing owl · Prairie falcon · Short-eared owl · Northern harrier	All	Both	emc0339GB
121.	An inevitable consequence of any large, ground-disturbing project is the increased risk of colonization by invasive, non-native species. In the sagebrush-steppe community, in addition to the slow regeneration of sagebrush, the biggest threat is the invasion of cheatgrass. Cheatgrass has the potential to completely alter the ecosystem it invades, increase fire frequency, and prevent the establishment of sagebrush and native grass and forb understory. When cheatgrass becomes a dominant presence on the landscape it can change the fire regime over a very broad area, causing hotter and more frequent fires that destroy nearby	All	Both	emc0339GB

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	sagebrush plants that were not impacted by the original construction project. Even assuming revegetation was successful, there is an increased risk of predation on nests by newly accommodated synanthropic predators. Raven, coyotes and other opportunistic predators will benefit from an open corridor, putting sage-grouse at further risk. The introduction of aggressive fauna and flora invasive species are often linked to human disturbances, such as new roads and construction of facilities associated with any proposed wind project in sagegrouse habitat.			
122.	Predation is a significant factor in managing Sage-grouse habitat. A paper, based upon 3 years of research, was recently published in Ecological Processes, a Springer Open Journal, titled Landscape Features and Weather Influence Nest Survival of a Ground-Nesting Bird of Conservation Concern, the Greater Sage-Grouse, in Human-altered Environments (Attachment E) has identified several methods for conserving Sage-grouse but points out that there is a specific lack of understanding of the relationship between energy development and nest and brood failure. Consequently, more research is needed before determining what mitigation measures would be most effective. Another recent paper, Identifying and Prioritizing Greater Sage-Grouse Nesting and Brood-Rearing Habitat for Conservation in Human-Modified Landscapes (Attachment E), published in the journal PLoS ONE (Attachment F) recommended that constraints on human activity be focused in specific areas rather than applied on a regional scale. Importantly, mitigation measures should be utilized primarily in areas of high habitat value. As such, mitigation should aim for a specific percent reduction in the risk of nest failure by contemplating constraints on infrastructure or water management activity within a given distance of a high probability of occurrence of nesting habitat. It is critical for a distinction to be made between low-performance habitat for nesting and brood rearing and high-performing habitat. Nevertheless, we recognize that measures to avoid or minimize the creation of new anthropogenic risk factors in high-performance habitat are needed along with steps to reduce existing risk factors that render a habitat low-performance such as burying utility lines, removing utility poles, and discouraging the use of facilities by avian predators would reduce predator density and effectiveness. In all, we strongly recommend that the agencies work closely with the oil and gas industry in developing site-specific measures that achieve the desired result of lowering predation risk in developed areas.	All	Both	emc0340GB
123.	Sage-grouse are a group of three separate species of grouse dependent, at least in part, on sagebrush ecosystems in the Western United States. As these ecosystems/habitats differ widely across the entire range, and even more so over the historical range, understanding their function is imperative in any plan or strategy to help protect, or enhance them. Other species of wildlife are also dependent on the same rangeland, and are further reason that single-species management, in lieu of ecosystem management for all species, should not be the management criteria for all dependent species. Sage grouse and related species also cross all classes of land ownership, and management. An all lands strategy should be implemented for the protection of the species, economic activities, dependent communities, and rangeland health.	All	Both	emc0341GB
124.	All stakeholders throughout the West, whether their goal is sage grouse recovery or merely avoidance of additional regulations, should be able to agree that sage grouse recovery is an outcome that best provides certainty for both sage grouse persistence and for industries that do business and communities who live within its range. At the same time, a strong sage grouse conservation plan, founded in establishing core habitats where land uses are made compatible with maintaining healthy habitat, is the cornerstone for protecting not only the grouse itself but also a broad diversity of other sagebrushdependent wildlife. Many of these species are also declining and may soon become candidates for ESA listing in the absence of a comprehensive conservation strategy.	All	Both	emc0343GB

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125.	We have attached a map of proposed Sage Grouse Areas of Critical Environmental Concern, a selection of the highest-density sage grouse populations with the most pristine and defensible habitat. We believe that all high-density sage grouse lek complexes meet the relevance and importance criteria for ACEC designation as a wildlife resource, due to the BLM Sensitive Species status and current trend toward listing, and the strong fidelity of these birds to particular breeding, nesting, and wintering habitats. These areas also feature habitat for an entire sagebrush ecosystem encompassing a variety of other sagebrush-obligate species including sage sparrow, sage thrasher, Brewer's sparrow, pygmy rabbit, and white-tailed prairie dog, as well as other species such as swift fox, ferruginous hawk, Wyoming pocket gopher, and burrowing owl, further underscoring their importance and relevance as a wildlife resource.	All	BLM	emc0343GB
126.	At minimum, the NEPA analysis should address the following: • Assessing the impacts of BLM-permitted activities on predation patterns, particularly with regard to coyote control, which results in an increase of smaller meso-predators that prey on grouse, eggs, or chicks at a much higher rate than do coyotes.	All	Both	emc0343GB
127.	In addition, an alternative should be developed that emphasizes fire suppression and predator control.	All	Both	emc0345GB
128.	In this section, the authors focus primarily on land health assessments and vegetation as a means to measure and mitigate livestock use. The NTT does not take into account any quantification of predation on sage grouse (e.g. where an abundance of predators and/or hunting pressure can create population "sinks" for the species").	All	BLM	emc0346GB
129.	Any conservation strategy needs to address the roles of predation and disease on sage grouse numbers and support the state and local government programs;	All	BLM	emc0371GB
130.	The sage grouse is found in areas where there are numerous predators, including coyotes, foxes, mountain lions, ravens, eagles, hawks and wolves, to name a few. Predator populations are at an all time high in the western states. While research has acknowledged the role of raptors on nesting success, the proposed interim conservation measures and most notably the NOI entirely omit the role of predators in direct sage grouse mortality. Ex. 1 at pp. 2-3 (noting the correlation between predator control and sage grouse numbers); Ex. 1A pp. 9-13. DOI and BLM's support for predator control has been hostile at times or lukewarm at best. The omission of predators promotes the erroneous conclusions regarding the impacts of land uses on sage grouse numbers.	All	Both	emc0371GB
131.	1. Role of Big Game Animals on Herbivory The NOI and Technical Team Report conspicuously omit the role of big game on herbivory. This is a material flaw, because big game populations have increased significantly over the last several decades. Ex. 1A p. 5 (big game numbers were low in days of early western settlement). In Wyoming, elk numbers continue to increase, often in or overlapping with sage grouse habitat areas. Elk are ungulates with the same or very similar habitat impacts as cattle. The elk populations are, in fact, significantly impacting sagebrush on wintering concentration areas. They have eliminated sagebrush at the Hardware ranch, for example. Some of these wintering areas are also sage grouse wintering areas. Sage brush is an absolute requisite to wintering sage grouse. on summer ranges, elk do not eat sage brush, but they concentrate on forb and grasses. In addition, deer and antelope, which are browsers that will consume sage brush, have also increased. Livestock do not eat the sage brush, only forbs and grasses that might form an understory for the sage brush. Omission of the browsers' impacts, their numbers and the issue of direct competition must be rectified in the RMP amendment process.	All	Both	emc0371GB
132.	Sage-grouse mortality via hunting, predation and disease must be analyzed in the plan amendment process in spite of the failure of	All	Both	emc0376GB

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	the national technical report to address these issues.			
133.	The BLM should discuss predator control and limitations on hunting with state wildlife managers as more effective ways to increase sage-grouse populations.	All	BLM	emc0376GB
134.	Things that haven't been addressed are predators and hunting. Not only are the predators numbers increased by several hundred percent their opportunities have been enhanced. We have built power lines throughout our country and every few poles down the line you see a bird of prey. They are very good hunters without the advantage. their numbers have also increased many times over. there are other predators such as ravens} red fox ground squirrels by the millions} raccoons that never used to be in our area and I am sure in many other areas. There number are un checked	All	Both	emc0377GB
135.	One major issue that needs to be addressed is the predator control. We feel this is an issue that really needs heavy attention in your management strategies, which includes coyote and raven control. The ravens cause a huge problem during our calving season , by eating at soft tissue (eyes, rear ends) until death of a calf. By controlling the raven population, the sage-grouse chick population will have a higher survival rate.	All	Both	emc0387GB
136.	There are a number of other factors that should be considered in cause and effect of SSG population variations, such as: Wolves: All the earlier journals and other documents confirm high wolf populations (and few, if any, Coyotes) in the 1800's and early 1900's. It is highly possible wolves were a significant predator of GSG during that period.	All	Both	emc0388GB
137.	Ravens and Coyotes: I firmly believe these two predator species have had, and continue to have, significant effect on GSG reproduction levels.	All	Both	emc0388GB
138.	Ban on use of 1080: This resulted in a significant increase in coyotes, ravens, hawks, and eagles; all predators of GSG	All	Both	emc0388GB
139.	I believe that this plan should have some predator management and horse management, the BLM has historically fallen short of maintaining the horses AML's in this state, horses have a greater impact on the habitat through their repeated use of areas unlike livestock were they are only in a area for short periods and are controlled.	All	Both	emc0389GB
140.	To begin with the wildlife picture as a whole has changed. There are much fewer mule deer in this area today. Conversely elk are present whereas they were not here until recently. The number of ravens have increased dramatically over the years. Often, you can drive through parts of our family ranch and see a raven perched on fence post after fence post after fence post. Ravens love eggs and especially easy prey from a newborn calf to a cow laying down calving. While we are not wildlife biologists it seems quite logical that elk would compete for the forage used by sage-grouse and the ravens are a nasty predator that preys upon their eggs and young.	All	Both	emc0390GB
141.	Public land is public and serves many uses besides ranching, however responsible livestock grazing is crucial to managing public land. It only makes sense that livestock grazing be a key component to not only managing for sage grouse, but wildlife in general.	All	Both	emc0390GB
142.	Bottom line...because our livelihood depends on public land grazing we CARE about public lands. Because our livelihood depends on public land grazing we are very willing to work with efforts aimed at wildlife conservation, including that of the greater sage-grouse. Removing livestock from the public rangeland would be detrimental to wildlife, the general public, ranching, and the local economy.	All	Both	emc0390GB
143.	Predator control is one of the major problems facing the sage grouse as there is not enough of it. Ravens, eagles and coyotes take a toll on the young chicks and has a direst negative affect on the sage grouse population. I am not saying these animals need to be	All	Both	emc0394GB

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	eradicated, just that if there was more predator control than there currently is the sage grouse population would see a rise. I have personally see the raptors circling on water holes that the chicks are at waiting for a chance for one of the to come out into the open.			
144.	The impact of predators must be addressed in sage-grouse management strategies. Predator controls used to limit the loss of eggs, juveniles and mature sage grouse will need to be carefully balanced with the simultaneous need to control other species which might negatively impact forage or cover but which are also vulnerable to the same predators. Predator density in relation to historical levels, distribution and relative impact should inform management decisions. Elevated levels of native predators and the presence of non-indigenous predators should be incorporated into management strategies. Again, the local working group model should be utilized to determine and implement the measures which are most likely to benefit the species.	All	Both	emc0396GB
145.	Avian and mammalian predation and hunting both have the potential to reduce population-level survival of greater sage-grouse. PCW's greater sage-grouse study evaluates cause-specific mortality when possible. Mortality for most seasons and for most grouse age cohorts is predominantly attributed to avian and mammalian predators. During fall hunting seasons, in areas of PCW's study site open to hunting, up to 30-40% of tagged birds are killed by hunters. These hunting mortalities include all ages and sexes of grouse.	All	Both	emc0399GB
146.	While BLM does not control predator management or hunting activities, the BLM should evaluate enhanced coordination with state and federal management agencies to identify and implement hunting closures or predator control measures where those sources of mortality have a major impact on population-level survival of greater sage-grouse.	All	Both	emc0399GB
147.	Unusually severe predation of Sage Grouse should not be underestimated. Many years of land management decisions involving promotion of rapt or friendly power lines and structures has not occurred without some undesirable affects. These practices for new and previously installed structures should be reviewed and re-evaluated in potential Sage Grouse locations. In addition control programs to discourage corvid nesting and persistence should be considered in specific Sage Grouse areas exhibiting excessive numbers of these birds.	All	Both	emc0400GB
148.	"Fit transmission towers with anti-perch devices." It doesn't matter what guidance is in place, BLM typically allows all manner of clearly hazardous transmission designs. For example, in minimal analysis for SWIP, Ely BLM in 2011 defied all current guidance on limiting guy wires that are collision hazards for birds and bats. It authorized what appears to be the world's worst design towers with myriad raven nesting and sites. Anti-perch devices currently in use may fall off, be dislodged, etc. as occurs with such devices on wind MET towers. See WWP China Mountain DEIS comments. All of this must be accompanied by a coordinated effort to remove artificial upland water developments for livestock, as well as remove large herds of livestock that provide carrion and other sources of food that subsidize unnaturally high raven and mesopredator populations.	All	BLM	emc0411GB
149.	Areas of low biological value and low energy potential (19% of eastern range, Fig. 3) represent low conflict opportunities for sage-grouse. Our analyses document the importance of these areas in maintaining connectivity to high value core regions in Montana (Fig. 3). Core regions with low biological value and low energy potential will be important in this regard, with restoration being one of the key strategies … So this appears to be sacrificing areas important for connectivity if the habitat has high energy potential. How is "low biological value" being determined? By only relying on sage-grouse? Needs of a whole suite of other species may be minimized. See, for example, ICBEMP Wisdom Terrestrial Vertebrate analyses (2002) and species groups/suites. Agencies must apply integrated conservation planning, and not sacrifice other habitats, or displace damaging grazing like grazing	All	Both	emc0411GB

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	into other habitats that are important for other rare or declining species.			
150.	Other population segments of Greater Sage-Grouse, and species that depend on sagebrush habitat, such as the Sage and Brewer's Sparrows, should also be considered in your environmental analysis, and best management practices for conserving these species should be included in any proposed management alternatives.	All	Both	fla0000GB
151.	Helping to preserve this species can also help protect many other plant and animal species, many of them are sagebrush specialists.	All	Both	fla0057gb
152.	Any plan amendment should include adequate site-specific analysis on anticipated impacts of motorized and non-motorized recreational activities, which often have little to no impact on wildlife. The impacts of motorized and mountain bike routes that are primarily used for recreation should not be "lumped in" with highways and other high-speed access roads.	All	Both	flb0000gb
153.	Other sagebrush obligate species, such as Sage and Brewer's Sparrow, pygmy rabbit, Wyoming pocket gopher, and myriad fishes, plants and mollusks should be considered in the environmental analysis and best management practices for conserving these species should be included in the proposed management alternatives.	All	Both	flc0000gb
154.	The grouse is a part of an ecosystem. It would be a shame to loose this bird, but to save it the areas in which it lives must protected as well as other wildlife that is a part of the ecosystem.	All	Both	flc0003gb
155.	Any EIS or SEIS must also explicitly recognize the following points: The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival.	All	Both	fli0000gb
156.	The beneficial effects of predator control must be addressed in sage-grouse management strategies. I believe that the predator control measures practiced during the 1940's through the 1960's had a marked impact on sage-grouse and deer populations. Specifically, raven control can be beneficial to nest and chick survival. Nevada's raven population has grown dramatically over the past 25 years and it has been stated we currently have extremely higher numbers of ravens over historic levels.	All	Both	flj0003gb
157.	Threats to sage-grouse should be avoided in all situations, especially livestock grazing and related influences thereof. This includes elimination of over grazing, fences, water developments and diversions, predator management, and leasing land to livestock interests where there is no profit being made by the federal government.	All	Both	flk0002gb
158.	Landowner members in the NESRSGWG request that the BLM analyze the impacts of predation on sage-grouse population sustainability. Increased regulation on BLM may not be enough to conserve sage-grouse populations if nothing is done to control predators.	All	Both	fxc0003RM
159.	Management of predators is a must in maintaining a health Sage Grouse population. We request that a more aggressive predator control program be initiated in Sage Grouse populated areas.	All	Both	fxc0004GB
160.	The impact of predators must be addressed in sage-grouse management strategies. Predator controls used to limit the loss of eggs, juveniles and mature sage grouse will need to be carefully balanced with the simultaneous need to control other species which might negatively impact forage or cover but which are also vulnerable to the same predators. Predator density in relation to historical levels, distribution and relative impact should inform management decisions. Elevated levels of native predators and the presence of non-indigenous predators should be incorporated into management strategies. Again" the local working group model should be utilized to determine and implement the measures which are most likely to benefit the species.	All	Both	fxc0006GB
161.	We have seen greater numbers of predators in our area the past few years. Ravens, crows, and magpie have devastating effects of nesting sage grouse. We have also seen greater numbers of fox and skunks that were almost unheard of a few years ago. Predation	All	Both	fxc0012GB

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	of sage grouse needs to be addressed.			
162.	It has been proven that it is impossible to determine an exact population number of sage grouse and we are therefore left to biologists to tell those making decisions for the management to lands what is required to satisfy the sage grouse needs. The biggest problem is that the sage grouse are so dumb that they are unable to read the literature written about their needs and requirements. For example, the biologist tells us that we can continue to hunt this species and that taking a given number will not affect the continuation of the population. Yet, the predator impact on the populations continues to have a large affect on the numbers.	All	Both	rmc0001GB
163.	What has dramatically changed especially in the last 40 years is the ratio of predators to prey. Predator species have increased dramatically in relationship to prey species. Current prey species populations are extremely low compared to predator populations. Ravens, Coyotes, Mountain Lions, Badgers, Foxes, Skunks, Eagles, and Hawks have all increased dramatically while rabbits, mice, rats, snakes, deer, and sage grouse have declined. What do predators eat if there are fewer rabbits, mice, snakes, or deer? They eat sage grouse. The sage grouse's utilization as a predator prey species has increased with predator populations as easier prey populations have declined. Most Sage Grouse historical habitat was occupied when there were low or no predator populations. If future land use plans include increased predator populations then historical sage grouse reference populations are grossly overstated. Future populations of Sage Grouse can not live in historical areas unless you remove the predators-they are too visible to predators and too easy to find. Predators associate leks as giant sized dinner plates!	All	Both	rmc0014GB
164.	Finally, I believe that sagebrush obligate species, such as Sage and Brewer's Sparrow, pygmy rabbit, Wyoming pocket gopher, and myriad fishes, plants and mollusks should be considered in the environmental analysis and best management practices for conserving these species should be included in the proposed management alternatives.	All	Both	rmc0020GB; rmc0004RM
165.	We recommend predator management.	All	Both	rmc0023GB
166.	Elko County believes that there are many scientific and philosophical questions that must be asked and answered prior to the implementation of conservation and preservation of the Greater Sage-Grouse habitat planning strategies. Is the current decline in wildlife caused by human impacts on public lands or are they a normality of nature? Many would like to believe that most of the west prior to settlement was abundant and profuse with wildlife and wildlife habitat. There have been many government sanctioned and funded explorations and settlements made in the 1800's into the west that document that there was no such abundance of wildlife in the region. Many explorer's and settlers journals documented the widespread lack of wildlife to sustain even the explorer's expeditions and travels. Many writing that they were forced to kill and harvest their own horses and dogs for food. As is well documented we know that wildlife migrate and move to habitat as needed for life. Could the changes in the wildlife and wildlife habitat over that past 100 years as the biologist state, been a common or natural occurrence? Does the presence of humans really have significant impact over such a diverse community of wildlife? Why do we believe that ecosytems that create such a habitat are so vulnerable, weak and fragile that they cannot survive human presence? Do the wildlife biologists and scientists have sufficient pertinent, credible and reliable data available encompassing the past 200 years to establish baselines as to exactly what the wildlife populations were in specific regions prior to the recent years that indicate declines?	All	Both	rmc0026GB
167.	The FWS listing decision also overlooks a significant issue in development of a conservation strategy, mainly recently released research from the Forest Service indicates that the number one killer of grouse is natural predators. 1 The Organizations note	All	Both	rmc0033GB

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	that potential predator issues simply are not addressed in the FWS listing decision or the 2010 Conservation Measures.			
168.	Predation, along with mineral production and disease are the 3 greatest factors affecting the survivability of the sage-grouse, far over shadowing livestock grazing as a possible culprit.	All	Both	rmc0034rm
169.	If pinyon juniper is restricted, will it later have a long term impact on other species (e.g., restricting raptor nesting habitat or reducing foraging lands?). The conservation of one species (e.g., sage grouse) should not have an impact on another species (e.g., raptors). These issues should be analyzed in the proposed EIS.	All	Both	rmc0035GB
170.	More importantly initiate a worthwhile like you mean it predator program - coyotes, ravens and badgers. Almost every coyote den in springtime will have feathers and bird parts around it. My personal view is that predators have 90% of bird population issues.	All	Both	rmc0048GB
171.	The Board supports the work of state and federal wildlife agencies to protect the Sage-grouse nesting and brooding areas through predator control. Appropriate monitoring by these agencies have established that predators such as coyotes, ravens, hawks, and eagles all pose a threat to the Sage-grouse and are major factors in the decline of the Sage-grouse populations. Documentation has shown that the number one cause of Sage-grouse nest failure is predation. The Board believes this issue should be thoroughly and accurately addressed within the PEIS in order to allow Sage-grouse specific predator control projects on BLM managed lands.	All	Both	rmc0050GB
172.	Over time it has been demonstrated, scientifically and historically, no practice is more important for restoring or maintaining a healthy balance and abundance in wildlife than that of carrying on sound predator control practices.	All	Both	rmc0054GB
173.	Analyze: The U.S. Fish and Wildlife Services inclusion of ravens in. SOCFR21.43 "Control of Depredation Birds". A species assessment on the raven as a limiting factor to sage-grouse population stability and increase.	All	Both	rmc0055GB
174.	2-Predation- The impact of predation is directly proportional to the population of the prey. When Sage grouse numbers are low it is easy for predation to keep numbers down. This is the situation at the present time on many sage grouse areas. Information that would provide a side by side comparison of the raven population and sage grouse numbers over time in Nevada would be revealing. It has been reported that ravens have increased by 5% annually in Idaho. Historically Sage grouse numbers were highest when predator control was at its peak. To concentrate on Habitat issues, and relegate a factor such as predation to a minor problem is unrealistic. Factual information rather than emotion is needed.	All	Both	rmc0057GB
175.	We are aware of the strong propensity for wildlife managers and other government agency personnel to be biased against meaningful management of predators. We understand that more can be gained by way of regulatory expansion by focusing on keeping habitat deficiencies in the fore-front as opposed to being actively engaged in actions that do something to improve bird production. We also are not of the belief that predator control actions are a "silver bullet" which will cure all ailments. Having laid these two opposite poles of perspective, we maintain that some middle-ground needs to be included in management activities that will be considered for mitigation and enhancement. Based on assessments of limiting factors, which are preventing sage-grouse populations from achieving maximum potentials, predator control action steps need to be included as part of the tool box of options. Properly applied predator control prescriptions should be presented for evaluation in the draft EIS document.	All	Both	rmc0058GB
176.	The analysis should include a complete analysis of predator impacts on the Grouse. Recent finding in other regions have noted an increase in predation attributed to an uncontrolled population growth of ravens. The Proposed Planning Strategy is largely silent on the issue of predator control with respect to management strategies for the Grouse. We strongly believe that no strategy can move forward without addressing a comprehensive review of predators and their impact on the Grouse.	All	Both	rmc0061GB, rmc0035RM

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177.	The NPSGWG also recommends that the Sage-Grouse EIS include an analysis of the impacts of predation and hunting on the sustainability of the sage-grouse population in North Park.	CO	Both	emc0060RM
178.	The issue of predators must be addressed as I believe predators are the greatest threat to sage-grouse.	CO	Both	emc0069RM
179.	There is an urgent need for BLM to develop and implement substantive conservation measures between now and 2015, when the U.S. Fish and Wildlife Service (FWS) will again consider whether the greater sage-grouse needs the protection of the Endangered Species Act (ESA). At the national level, through the establishment of the National Sage-Grouse Planning Strategy, the Bureau of Land Management has committed to a new paradigm in managing the sagebrush landscape. If BLM succeeds in its regional goal of improving management of the sagebrush landscapes across the West, this has the potential to not only conserve the greater sage-grouse and ensure that the species does not need to be protected under the Endangered Species Act, but also effectively conserve sagebrush natural areas, big game herds and 350 other species that rely on sagebrush landscapes, all while benefiting western economies and communities.	CO	BLM	emc0070RM
180.	The Meeker/White River and Parachute Piceance/Roan populations (Colorado Plateau MZ) are in the Uintah-Piceance geologic basin. These populations are small and isolated, and are threatened by demographic, genetic and environmental stochasticity due to small size and isolation. In addition, these populations are threatened by a suite of deterministic threats, including: housing and energy development, predation, disease, and conifer invasion. Based on projected habitat impacts (particularly energy development) under current management prescriptions, the FWS believes that all of the populations in the Colorado Plateau MZ will be reduced in size and isolated in the future.	CO	BLM	emc0070RM
181.	While existing or draft RMPs in NW Colorado discuss a number of traditional sources of direct and indirect impacts of anthropogenic developments on greater sage-grouse, CPW has noticed a lack of information and discussion of how and when noise from oil and gas development impacts greater sage-grouse. There is a developing body of literature suggesting that limiting anthropogenic sources of noise is necessary to minimize human impacts on greater sage-grouse (as well as other grouse species in the family Tetraonidae). There are a number of mechanisms by which anthropogenic sources of noise can negatively impact grouse, including the following: • Industrial noise masks the sounds of strutting males and may disrupt female choice of males on the lek (leading to reduced productivity)and cause females (and consequently males) to abandon leks; • Industrial noise masks sounds made by approaching predators and may lead to increased predation and reduced survival for all age and sex classes in all seasonal habitats, not just at leks. Over time, this may result in reduced survival of birds inhabiting areas near noise sources and ultimately, fewer birds in developed areas. Sage-grouse may also avoid areas with industrial noise, which would result in the same pattern; • Industrial noise in brood-rearing habitats may mask the predator-warning vocalizations given by females to chicks or the contact calls of lost chicks, either of which could lead to reduced brood survival; • Sage-grouse of all age and sex classes in all seasonal habitats may respond to increased ambient noise by increasing time spent being vigilant, thereby increasing energetic costs and decreasing time available for foraging and self-maintenance, leading to poorer body condition and reduced productivity; and • Industrial noise could cause chronic physiological stress that leads to poorer body condition and reduced survival or productivity	CO	Both	emc0072RM
182.	Habitat Mitigation: Moffat County generally supports the concepts of compensatory mitigation philosophies, however, broad reaching concepts can sound good until the details have been discussed. Therefore, we look forward to discussions about how the details will be addressed. Distance from disturbance where mitigation may occur is critical in these discussions. Moffat County	CO	Both	emc0076RM

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	generally does not support mitigating impacts in areas long distances from where the impacts occur. Local basin compensation, generally within the same watershed, is most favorably looked upon . Mitigation long distances from the effect can result in sacrificing one area in favor of another miles, counties, or states away. And is generally less favorably looked upon.			
183.	Wildlife predation needs to be addressed. Especially the birds and mammals that prey on egg nests such as the ravens, crows, coyotes, fox and skunks	CO	Both	emc0135GB
184.	Critical look at the role of predation on the Greater Sage-Grouse including what is going to be done to address that predation. No matter the amount of habitat available, if the predation continues as is the grouse numbers will continue to decline to the detriment of all other multiple uses and all for nothing.	CO	Both	emc0178RM
185.	Natural areas that are habitat for sage-grouse also support some our state's largest and most prized big game herds, and more than 350 other kinds of animals and plants. Protecting these areas will help conserve Colorado's wildlife, including deer, antelope, and songbirds. I enjoy the outdoor recreation opportunities that these natural areas provide. I also feel that conserving these natural wildlife areas is important to the success of wildlife related recreation and tourism, which provides good jobs and is important to our economy.	CO	BLM	fll0000RM
186.	The BLM should put mandatory standards in place to safeguard sage-grouse. Because inappropriately located oil and gas development has been formally recognized by U.S. Fish & Wildlife Service as being a major threat to sage-grouse in Colorado (and throughout the eastern range), the Resource Management Plans cannot rely on voluntary standards to minimize the negative impacts of oil and gas drilling. BLM should require companies to act responsibly to protect greater sage-grouse. I respectfully ask that the BLM put important safeguards in place in its long-term management plans, to save the sage-grouse and conserve our land, water and wildlife for future generations to enjoy. Thanks for your consideration.	CO	Both	flm0000RM
187.	The BLM's Resource Management Plans could identify analysis areas within the overall pliolity habitat areas within their planning areas similar to what is done for other species such as the Canada lynx, in order to reasonably manage sage-grouse and allow for the responsible development of electric delivery and other energy facilities within suitable sage-grouse habitats.	CO	BLM	rmc0019RM
188.	The EIS should also consider impacts from predation and other uses such as ATV s, recreational 4X4s, mountain bikes, camping, hiking, horseback riding, and other recreation uses.	CO	Both	rmc0050RM
189.	i. Lander, WY RMP The Lander draft RMP proposes extending seasonal wildlife protections to identified operations and maintenance (O&M) activities in non-Designated Development Areas, if those activities are identified as detrimental to wildlife (Alternative D). As noted in the DEIS, this action "would not preclude development or limit the number of wells and would result in no more adverse impacts than management under Alternative A, which does not have timing limitations on O&M" (DEIS at 649). Extending seasonal protections beyond the development/construction period will benefit wildlife during the sensitive winter and nesting periods. Protections would be instituted for activities like fracking, power line reconstruction, range improvements, and road maintenance. As recognized by the DEIS, these activities can "stress and disturb wildlife during the sensitive winter and nesting periods due to the time it takes to complete the work, the level of noise generated, and the presence of people and equipment. It is expected that project O&M activities would result in both short-term adverse impacts related to animal displacement and long-term adverse impacts if the level of activity results in area avoidance or loss of nests or young" (DEIS at 818). We strongly encourage the BLM to adopt this provision.	East	Both	emc0089RM

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190.	Why is the bird population declining? We believe it is due to the following: West Nile virus, eagles, hawks, fire, cheat-grass and numerous predators.	East	Both	emc0108RM
191.	Any conservation strategy needs to address the roles of predation and disease on sage grouse numbers and support the state and local government programs;	East	Both	emc0155RM
192.	The sage grouse is found in areas where there are numerous predators, including coyotes, foxes, mountain lions, ravens, eagles, hawks and wolves, to name a few. Predator populations are at an all time high in the western states. While research has acknowledged the role of raptors on nesting success, the proposed interim conservation measures and most notably the NOI entirely omit the role of predators in direct sage grouse mortality. Ex. 1 at pp. 2-3 (noting the correlation between predator control and sage grouse numbers); Ex. 1A pp. 9-13. DOI and BLM's support for predator control has been hostile at times or lukewarm at best. The omission of predators promotes the erroneous conclusions regarding the impacts of land uses on sage grouse numbers.	East	Both	emc0155rm
193.	The NOI and Technical Team Report conspicuously omit the role of big game on herbivory. This is a material flaw, because big game populations have increased significantly over the last several decades. Ex. 1A p. 5 (big game numbers were low in days of early western settlement). In Wyoming, elk numbers continue to increase, often in or overlapping with sage grouse habitat areas. Elk are ungulates with the same or very similar habitat impacts as cattle. The elk populations are, in fact, significantly impacting sagebrush on wintering concentration areas. They have eliminated sagebrush at the Hardware ranch for example. Some of these wintering areas are also sage grouse wintering areas. Sage brush is an absolute requisite to wintering sage grouse. on summer ranges, elk do not eat sage brush, but they concentrate on forb and grasses. In addition, deer and antelope, which are browsers that will consume sage brush, have also increased. Livestock do not eat the sage brush, only forbs and grasses that might form an understory for the sage brush. Omission of the browsers' impacts, their numbers and the issue of direct competition must be rectified in the RMP amendment process.	East	Both	emc0155rm
194.	I heard several speakers indicate predation is the primary cause of sage-grouse declines. You know full well that increased predator control is needed and that the current system restricting predator control is actually doing harm. The need to provide habitat that is not overrun with predators detrimental to sage-grouse survival is an issue that needs to be fully addressed. Properly managed predator populations would benefit sage-grouse more than any other available management action.	GB	Both	emc0160GB
195.	Predation: We also have concerns that predation to sage-grouse is a major contributing factor to the current declines in sage-grouse numbers. In particular, we have concerns regarding current population numbers of crows and ravens throughout the Great Basin. Mechanisms need to be put in place to better monitor and manage these species in order to conserve sage-grouse.	GB	Both	emc0180GB
196.	The impact of predators must be addressed in sage-grouse management strategies. Predator controls used to limit the loss of eggs, juveniles and mature sage grouse will need to be carefully balanced with the simultaneous need to control other species which might negatively impact forage or cover but which are also vulnerable to the same predators. Predator density in relation to historical levels, distribution and relative impact should inform management decisions. Elevated levels of native predators and the presence of non-indigenous predators-should be incorporated into management strategies. Again, the local working group model should be utilized to determine and implement the measures which are most likely to benefit the species.	GB	Both	rmc0056GB
197.	(identified as a priority issue in the Dillion Area) effects of predation	IDMT	Both	rmc0028GB

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198.	There is no evidence that cattle have any impact on sagegrouse, either positive or negative. However, there is plenty of evidence that ranching has a strong positive impact on sagegrouse. Ranches need to be relatively large and usually in native vegetation. This protects against habitat fragmentation and the destruction of sagebrush for fields or lawns. Ranchers need vegetation and will control fires to some extent. Hot, late, uncontrolled fires will destroy large areas of big sagebrush, which takes over a century to recover from a burn of this kind. Ranches tend to have some degree of predator control, and predators are the largest negative impact on sagegrouse, following sagebrush destruction. Areas with healthy sagegrouse populations tend to have ranches, areas that have lost their ranches have also lost their sagegrouse. It is easy and popular to protect sagegrouse from cattle, but the cattle don't harm the sagegrouse. If you remove the cattle, you also remove the ranches, which are important to the sagegrouse. Sagegrouse can be protected into extinction just like rare orchids and desert pupfish.	MT-RM	Both	emc0023RM
199.	Being on the ground every day, our members concerns over predation on the sage grouse have been largely disregarded. Our groups would like to request that additional research be conducted on the effects of predation on sage grouse and its impacts on the population. In many cases, habitat is the only factor considered in relation of sage grouse populations, but our community members know that other factors impact this species. Additional studies need to be conducted, similar to the USDA study, which showed significant predation on sage grouse by predators. http://billingsgazette.com/news/state-and-regional/wyoming/predation-leading-cause-of-grouse-mortality-usda-study-suggests/article_. In addition, a BLM-funded study by Montana Fish, Wildlife and Parks, depredation by nest predators was the primary cause of nest failure in both 2010 and 2011. Almost 90% of hen mortality was attributed to depredation. The report states, 'We did not observe any direct negative impact of livestock on nesting grouse (e.g., trampling of nests)' (Foster, 2012)	MT-RM	Both	emc0157
200.	Our county would like to request that additional research be conducted on the effects of predation on sage grouse and its impacts on the population. In many cases, habitat is the only factor considered in relation of sage grouse populations, but our community members have on-the-ground knowledge that other factors impact this species. Additional studies need to be conducted, similar to the USDA study, which showed significant predation on sage grouse by predators. http ://bilJingsgazette.com/news/state-andregi onallwyo min g/predati on -1 ead in g-cause-of-grouse-mortal l ty-usda-study-su ggests/arti cl e	MT-RM	Both	rmc0023RM
201.	Let the ranchers graze there herds on there allotments,keep hunters off the land. We have million acres of land in Nevada that is not owed by the public let them hunt there.	NVCA	Both	emc0012GB
202.	And last but not least the predator control program needs to be increased across the board, we are spending to much money doing study's when the answer is right in front of our face, take out the predator equation and all populations increase.	NVCA	Both	emc0187GB
203.	Predators are likely the biggest problem but what can be done in today's climate? Crows and ravens should not be protected and coyotes need to be controlled. Those three are the worst grouse predators.	NVCA	Both	emc0253GB
204.	The agencies should coordinate Sage Grouse conservation measures with the agencies' wildlife programs. Since predators are being cited as a scapegoat for Sage Grouse population declines by some and predator control or extermination is being proposed by some as a "conservation" measure, the EIS should examine whether predation is a significant threat limiting Sage Grouse populations in all PMUs, using information from the state's Sage Grouse conservation plan.	NVCA	Both	emc0283GB
205.	There are Significant Populations of Sage Grouse Predators: Coyote, bobcat and raptor populations are high in this area, probably due to cattle and horse populations and rodents in the grassy reclaimed areas. The predator and rodents particularly utilize the	NVCA	Both	emc0287GB

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	elevated rock mounds emplaced during reclamation to resemble the original natural topography of spotty elevated outcrops and cliff. These elevated areas could serve as perching sites for preying raptors.			
206.	But also to providing quality habitat to support wildlife populations. Scientific research indicates that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife.	NVCA	Both	emc0304GB
207.	NDOW White Paper March 2012: The paper describes the five categories of habitat, plus non-habitat. It has no category for historical habitat that has been lost. At a minimum, habitat of moderate importance and transitional range, as well as low value habitat that has mature or old growth sagebrush present, must be included as high value, or key, habitat. It is of great concern that human land-use development will be allowed to proceed, but detailed site-specific studies are not required. While sage-grouse may be broadly distributed, the habitat is peppered with holes, and often is highly degraded as well. There is extensive natural fragmentation all the Great Basin mountain ranges as well as salt desert habitats in valley bottoms. On top of this is a plethora of livestock, mining, energy, agency treatment, and fire disturbance adversely impacting remaining habitat quality and quantity. While sage-grouse may be considered an umbrella species by some, in Nevada the agency attitude (for example Ely BLM and ag interests supporting ranchers who seek continued destruction of sagebrush) towards mature and intact sagebrush communities is causing big leaks in the umbrella. In fact, the umbrella is collapsing in many areas as cheatgrass and other weeds sweep Ely treatments claimed to be for sage-grouse. Sage-grouse are being used as an excuse to radically alter sagebrush, and destroy old growth and mature pinyon-juniper as well as trees re-colonizing historic ranges. In fact, the Ely RMP proposes manipulation of fully 2/3 of the native vegetation communities an action likely to result in tremendous desertification and habitat loss for both sagebrush and pinyon-juniper dependent species. We are concerned that the NDOW report claims sage-grouse are an umbrella species for the pygmy rabbit when in fact, NDOW will promote Ely and Elko BLM and Forest Service projects like in the Santa Rosa RD projects that purposefully alter, reduce destroy denser sagebrush required by the pygmy rabbit. This is in part justified by claiming that sagebrush with good microbiotic crust understories and denser Wyoming sagebrush cover is somehow deficient based on biased soil inventories and then added onto this are claims that the community is decadent and only destroying it will somehow save it. When in fact, these are very important habitats that often support high densities of pygmy rabbit, sage sparrow, etc. NDOW also supports (as in the Montana Mountains) band-aid fencing projects of riparian or stringer meadow areas rather than an integrated hard look at livestock impacts. For sage-grouse in Nevada to be an umbrella species, NDOW needs to start sticking up for wildlife values, and not taking the easy route out by endorsing projects that alter sagebrush, destroy it in the process of a general purging of trees, or that serve to shift and intensify harmful livestock impacts in other areas as the agency currently is doing.	NVCA	Both	emc0411GB
208.	Killing predators is the easy path to take, rather than promoting livestock reductions. Yet there is very little information provided on all the ways in which livestock grazing and facilities promote ravens and mesopredators, and strip and reduce cover necessary to conceal nests and otherwise greatly exacerbate predation risk. This includes: Carrion, livestock body parts such as docked sheep trails or parts from calf castration that we have observed littering public lands in Nevada, livestock waste food sources (including insects under cattle manure cow “flops” that ravens turn over to look for insects); artificial upland livestock water sources that attract ravens and extend areas used by them such as pipelines, water hauling, water troughs; elevated structures like fence posts, well tanks, etc. where ravens perch (and they also may nest on well troughs or other structures); livestock feed supplements with bits of cracked horn or other raven food; and many other sources of additional food and water that support ravens and often other mesopredators. Then there are the myriad ways that ivestock grazing disturbs nesting birds and alters	NVCA	Both	emc0411GB

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	critical habitat components necessary to protect nests from visual predators.			
209.	The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival. Nevada's raven population has grown dramatically over the past 25 years and it has been stated we currently have extremely drastic increase in ravens over historic levels.	NVCA	Both	flj0000GB
210.	What I have noticed is that from year to year or decade to decade the amount of animals that live in our ecosystem changes. There have been years where we have had larger numbers in our deer population then in the past The balance of an ecosystem is an ever changing thing and a process that far exceeds the understanding of any individual.	NVCA	Both	fxc0016GB
211.	The implementation of government sponsored predator control at the time of the advent of agriculture in the Great Basin resulted in a reduction of coyotes and other sage-grouse predators (Nevada Wildlife Federation,' Enhancing Sage Grouse Habitat ... a landowner's guide). The guide also refers to the increase in sage-grouse popUlations brought on by settlement and the changes of plant communities, followed by declines in populations attributed to market hunting and liberal seasons and bag limits. Those issues, combined with the banning of effective predator control (1080) by government edict, must be a factor in the decline of the sage-grouse population. The proliferation of ravens in our area is a major problem. These voracious creatures must be having a detrimental effect upon the sage-grouse population, and some type of controls should be implemented. Human predation is also an issue. Continued hunting of a species which has been declared "warranted but precluded" from protection under the Endangered Species Act is outrageous.	NVCA	Both	rmc0065GB
212.	Reference to and use of the Oregon Dept. Fish and Wildlife. April 2011 . Greater Sage-Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat should be addressed during the EIS development. The plan has numerous references to published literature that can provide a framework for the federal plan regarding many aspects of the sage grouse survival. habitat, and vulnerability to predators and disease. Predation is one area that needs to be investigated to further the knowledge about sage grollse populations. The following is Stated by the ODFW plan: • Population ecology-Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some level of rigor to the data collection. (Oregon Dept Fish and Wildlife, April 2011. Greater Sage-Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat).	OR	Both	emc0136GB
213.	The District wildlife inventories in Oregon should be up-dated to provide a credible road map about the landscape. This work and information should be referred to the Wildlife programs where education, training, an experience with wildlife issues will complement the work that needs to be done. There should be cooperation between wildlife programs to coordinate studies that can identify new population count methods. As stated in the ODFW plan. the BLM should heed the need for more rigorous sampling procedures: • Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly, there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some level of rigor to the data collection.	OR	Both	emc0136GB
214.	Another reason is back then the cattle and sheep men used 1080 poison on the predators and that really helped. Not only did this help the sage hens, but all of the rest of the wild life also. In our area, the Experiment Station has done a study about this and the sage hens started going downhill right after they banned the use of 1080 on the predators.	OR	Both	rmc0046GB

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215.	I know in our area the range hasn't changed that much, but you don't see very many sage hens and I know the livestock are not the problem, but we have every predator there is and the last several years we have seen a large increase in cougars. In my opinion, we will never help the sage hen problems without some serious control of the predators.	OR	Both	rmc0046GB
216.	Any EIS or SEIS must also explicitly recognize the following points: The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival.	OR	Both	rmc0078GB
217.	My name is scott hatch from spanish fork utah. I recently drove from St George to Spanish Fork and decided to count the number of ravens along the side of the freeway. I counted 52 and I wasnt really looking that hard. these ravens and the coyotes and fox are probably the reason the sage grouse arent surviving. you should probably get a bounty on the ravens. i have also seen ravens chasing hawks and stealing their kills.	UT	Both	emc0049RM
218.	Coyote, Raven and Eagle populations have been allowed to increase in recent years, this could become a predator/ prey problem again	UT	Both	emc0137GB
219.	The main problem that exists locally is the increased presence of predators: Crows, Ravens, Eagles, Hawks, Foxes, Coyotes, Raccoons, Skunks, etc. are everywhere nowadays and increasing In numbers each year. I have no doubt that they take a very large toll on Sage Grouse eggs and nests, as well as other upland animals.	UT	Both	emc0405GB
220.	Many members of the local working groups -- from agency biologists to local ranchers -- are particularly coverned because the management options for improving sage-grouse habitat, especially using vegetation management, vary considerably depending on location, elevation, local land use management history, etc. What works to improve habitat in some areas may be potentially detrimental in other areas. For example, the effects (for sage-grouse) of similar mechanical treatments could vary dramatically based on upon precipitation zones, elevation, weed infestations, and other factors	UT	Both	emc0405GB
221.	Predation - In the agency assessment of threats to Sage Grouse, predation is identified as approximately half the threat as agriculture and grazing. Our experience in Utah suggests otherwise. Proper grazing enhances Sage Grouse habitat and populations. Proper grazing practices allow Sage Grouse to strut and more safely occupy habitat where they can observe predators like fox, ravens and coyotes. Utah's Strawberry Valley experience suggests that predators are a major threat to Sage Grouse. In an area with no energy development or livestock grazing. Sage Grouse numbers have been greatly impacted by predators - especially fox and ravens.	UT	Both	rmc0003GB
222.	Garfield County requests specific analysis regarding identification of predators, impact of predators, existing predator control efforts, and all reasonable predator management options as they relate to Sage Grouse populations.	UT	Both	rmc0006GB
223.	The position that the threat of possible Sage Grouse listing has placed our citizens, western land states and their local government entities in, we view as a direct result of years of federal regulatory onus. Carbon Comity shall take a willing role in working to remedy this issue but believe that until the federal agencies and our national leadership recognizes that; reducing grazing AUM's west wide consistently for over 50 years, listing under ESA the natural predators of the grouse species, outlawing the use of poisons used to prevent predation and the promotion of fuel/biomass buildup by interrupting natural fire regimes have hosted the consequences we and the bird now endure.	UT	Both	rmc0026RM
224.	Predation is greatly under estimated as a threat of the sage grouse. When the use of 1080 and strychnine was eliminated as predator controls, the population of Coyotes and raptors as increased greatly, and the population of sage grouse has declined correspondingly. Heavy losses in the winter to Coyotes and eagles.	UT	Both	rmc0062GB

Table C-7.A
Comments Related to Wildlife-General

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
225.	Additionally, Emery County agrees with the concerns, which were repeatedly expressed by attendees at the public meetings, regarding the need to address the impacts of predation on conservation of the Greater Sage-grouse.	UT	Both	rmc0073GB
226.	Policy Statement 7: West Nile Virus: ' Artificial water impoundments will be managed to the extent of BLM's authority for the prevention and/or spread of West Nile Virus...This may include..(c) building steep shorelines to reduce shallow water and emergent aquatic vegetation; (d)maintaining the water level below rooted vegetation; (i) restricting access of ponds to livestock and wildlife (Doherty 2007).The BLM mentions several instances where they would regulate reservoir use by fencing out, making the banks too steep for livestock use, keep water level low: The reservoirs on federally managed lands are for the wildlife as well as livestock use. If the reservoirs are fenced out, banks made too steep or the reservoir is unfit for livestock to use; the water will also be unfit for wildlife use. Young elk, pronghorn and deer will not be able to get out of steeply sloped reservoirs any more than sheep or cattle. You are not allowing yourselves to look at the whole picture. Multiple use means wildlife and livestock. The use of larvicide is a good recommendation if used according to the label.	WY	BLM	emc0050RM
227.	Fencing out is a bad idea because if an animal is thirsty enough they will crawl over and then either be caught in the fence or unable to get back out to graze. Eventually the fence will be down and be a hazard with loose wires to entangle animals. This applies for wildlife as well as livestock.	WY	Both	emc0050RM
228.	The BLM could make it a point to distribute the B.t.i. Briquets within 3 miles of nesting and lek areas on standing large bodies of water. These are not poisonous to wildlife (if directions are followed) and should only be distributed on waters not for human consumption. An incorrect use of these might cause litigation of mismanagement due to animal illness. The Briquet will prevent the mosquito larvae from thriving and help decrease the chance of spreading West Nile.	WY	BLM	emc0050RM
229.	Hard winters are a fact of life. There are times that the snow is so deep there is no protection from predators for the sage grouse. The sagebrush in several areas of the state is not tall but will protect sage grouse during most normal winters.	WY	Both	emc0050RM
230.	The habitat is there but no sage grouse for whatever reason. Several private landowners maintain good habitat, if the habitat is there and predator population is managed then the sage grouse could be brought back. Predators kill many grouse every year and need to be controlled especially around sage grouse core areas.	WY	Both	emc0050RM
231.	I have seen cattle and sage grouse grazing and resting side by side. The cattle will keep the predators away to protect their calves. Yearlings will follow a coyote for a long way out of curiosity. My point is that sage grouse are safer with cattle in the same area because the coyote, fox and bobcat will be not as prevalent.	WY	Both	emc0050RM
232.	i. Lander, WY RMP The Lander draft RMP proposes extending seasonal wildlife protections to identified operations and maintenance (O&M) activities in non-Designated Development Areas, if those activities are identified as detrimental to wildlife (Alternative D). As noted in the DEIS, this action "would not preclude development or limit the number of wells and would result in no more adverse impacts than management under Alternative A, which does not have timing limitations on O&M" (DEIS at 649). Extending seasonal protections beyond the development/construction period will benefit wildlife during the sensitive winter and nesting periods. Protections would be instituted for activities like fracking, power line reconstruction, range improvements, and road maintenance. As recognized by the DEIS, these activities can "stress and disturb wildlife during the sensitive winter and nesting periods due to the time it takes to complete the work, the level of noise generated, and the presence of people and equipment. It is expected that project O&M activities would result in both short-term adverse impacts related to animal displacement and long-term adverse impacts if the level of activity results in area avoidance or loss of nests or young" (DEIS at	WY	Both	emc0089RM

Table C-7.A
Comments Related to Wildlife-General

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	818). We strongly encourage the BLM to adopt this provision.			
233.	BLM's indirect effects section should consider impacts and benefits to other sage-dependent species The decline of the greater sage-grouse is just one symptom of a much larger problem – the decline of the sagebrush ecosystem. Sage-grouse is just one of many species that uses the sagebrush habitat and it has been used an indicator species of sagebrush ecosystem health. See, e.g. Steven E. Hanser and Steven T. Knick, Greater Sage-Grouse as an Umbrella Species for Shrubland Passerine Birds: a Multiscale Assessment, ECOLOGY AND CONSERVATION OF GREATER SAGE-GROUSE: A LANDSCAPE SPECIES AND ITS HABITATS, USGS, Nov. 2009, at 18: ("Management to benefit Greater Sage-Grouse may benefit the broader community of birds that use sagebrush steppe habitats"). Sagebrush ecosystem conservation may also benefit sage-dependent large game like pronghorn and mule deer. BLM should disclose the indirect benefits (or impacts) of its proposed action and alternatives on other species and the sagebrush ecosystem itself.	WY	Both	emc0129RM
234.	10) Avoid or minimize impacts on sage grouse populations and habitat when developing management strategies or actions for other wildlife species that use sagebrush habitat.	WY	USFS	emc0144RM
235.	Factors such as vegetation management, fire management, conflicting wildlife management, predation, subdivision and infrastructure development, and invasive plants are a higher priority in the Upper Snake River Basin Conservation Area (USRBCA) and include large areas that could be affected by project actions.	WY	USFS	emc0144RM
236.	Wyoming is the last remaining stronghold for the greater sage grouse, and clearly the Wyoming population, having become the core of the rangewide sage grouse population, offers the last best hope of preventing sage grouse extinction. GIS analysis shows that Wyoming has the largest expanse of least fragmented sagebrush habitat remaining in North America (Knick et al. 2003). According to Rowland et al. (2006:v), "Concomitant with the amount of sagebrush habitat, the Wyoming Basins area harbors some of the largest extant populations of sagebrush-obligate species, such as greater sagegrouse and pronghorn. Future persistence of these sagebrush-obligate species therefore is closely linked to effective management of sagebrush habitats in the Wyoming Basins." These researchers mapped sagebrush habitats versus fragmentation in relation to sage grouse in the Wyoming Basins Ecoregion (see p. 5-31), and found that the Red Desert is one of the remaining major hotspots. But sage grouse populations in the state have been on a longterm downward trend, still cycling upward and downward but both the peaks and the troughs in population are steadily being reduced over the past 50 years.	WY	Both	emc0343GB
237.	A collateral impact of coalbed methane development is increased threat of West Nile virus, which is deadly to sage grouse (Naugle et al. 2004). Coalbed methane ("CBM") wastewater ponds are known to provide ideal habitat for the Culex spp. mosquitoes which carry the WNv and infect sage grouse. Mosquito infection with WNv associated with Powder River Basin CBM wastewater ponds was demonstrated by Naugle et al. (2004). While West Nile virus has been a lesser cause of mortality for sage grouse over the last two years, this does not guarantee that a major outbreak will not sweep across the sage grouse range at some time in the near future, as illustrated by the repeated outbreaks of similarly non-native Yersinia pestis in black-tailed prairie dogs. West Nile virus is a significant threat to sage grouse, and has contributed to population declines (Naugle et al. 2004, 2005). In laboratory experiments, the demonstrated ability of sage grouse to develop immunity to this disease has been shown to be very poor (Clark et al. 2006), and resistance to the disease in wild grouse populations is very low (Walker et al. 2007). Coalbed methane development in some parts of the sage grouse range has been associated with surface disposal of produced water, which typically entails the construction of infiltration reservoirs or local flooding, or both. Coalbed methane wastewater ponds have been shown	WY	Both	emc0343GB

Table C-7.A
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	to increase habitat for the Culex spp. Mosquitoes which carry the WNv and infect sage grouse (Doherty 2007). In the Powder River Basin, the interaction of West Nile virus with standard-density coalbed methane development has been predicted to result in the "functional extirpation" of the population (Taylor et al. 2012, see Attachment 2). Indeed, according to these researchers, "if development continues, future viability of the already small sage-grouse populations in northeast Wyoming will be compromised." To add to the problem, reservoirs attract sage grouse predators, and as a result Dzialek et al. (2011) recommended siting reservoirs and other water features more than 200m from nesting habitat.			
238.	First, I would like to point out that predator populations in the breaks area have increased dramatically in the last thirty years. While coyote, bobcat, and mountain lions are plentiful, the most noticeable change has been the increased number of red fox, hawks, golden eagles and crows. This has put a lot of negative pressure on game bird populations, including sage grouse. In my view, it would be pointless for federal and state agencies to try and devise a management plan for sage grouse without acknowledging this central fact.	WY	Both	rmc0012RM, rmc0022rm
239.	Case in point: Keyton 3 Lek, located in the northwest part of the 4W Ranch had always been an active lek with 20 to 30 males strutting annually. 314 of a mile to west of this lek on Frog Creek in a small grove of Cottonwood Trees there has been a historic and active Red-Tail Hawk nest. In 2007 a pair of Golden Eagles took over that nest for one breeding season. The close proximity of these eagles completely disrupted the lek for that year and the sage-grouse have notreturned to Keyton 3 Lek since. Red-tails returned to their nest in 2008, but the Grouse have not. This was certainly not the fault of livestock grazing, and this is a clear case of predation. How many other leks are influence by the presence of Golden Eagles and other large raptors? Then you add the Coyote and the Red Fox in this area and you have quite an arsenal of predators working on a limited prey base of sage-grouse and rabbits. It must also be understood that Red-tailed Hawks by nature are mousers. Small rodents are their main prey and a sagegrouse is by far too large of a prey for them. This is probably why the Red-tail and the grouse coexisted in this area for so many years.	WY	Both	rmc0034rm
240.	Another case in point. Sage -Grouse habitat has been destroyed by Black-tailed Prairie Dog (PD) population expansion and encroachment into the sagebrush. During the past 20 years the 4W Ranch has witnessed the complete destruction or the thinning of sagebrush areas by the PD in what is now part of the Sage-Grouse Core Area. The Forest Service's Prairie Dog Management Strategy Plan 3 which prevents aggressive lethal control of the PD in certain areas of the Thunder Basin National Grasslands is contributing to the destruction of the Sage-Grouse Habitat on the 4W Ranch.	WY	Both	rmc0034rm
241.	This photo taken on 17 March 2012 shows the Rangeland destruction caused by the PD. This once vibrant stand of sagebrush and rangeland was destroyed, not by fire, not by overgrazing by livestock, but totally destroyed by the Black-tailed Prairie Dog.The above photo is indicative of the destruction that is now happening to a once healthy sagebrush ecosystem throughout the Thunder Basin National Grasslands by one species of destructive wildlife. Are we going to have protected PO's or are we going to have habitat for Sage Grouse? [Note: photo included as attachment in comment letter]	WY	Both	rmc0034rm
242.	The continued expansion of prairie dog habitat upon and encroaching into and thereby limiting sage grouse habitat is detrimental to the qual ity and quantity of .age grouse ha bitat in the area, addressed. There are a large number of aues devoted to prairie dog, which are critical to sage grouse livelihood in Ihe TIING. It I, well known that prairie dog inhabitation change, the vegetative landscape from bru.h and a mid gra,s community to a dominate blue gamma grass community. That is definitely to the disadvantage of our sage grouse in the TBNG. They thrive where sagebrush in addit ion to several mid gra;~s dominate the land,cape. They are	WY	Both	rmc0043RM

Table C-7.A
Comments Related to Wildlife-General

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	not viable in a blue gamma dominate landscape because far too much open ground lead, tn de:oth for them.			
243.	A large portion of the Catecory 1 and the Category 2 prairie doc management areas contain vital sage grouse habitat. To furth er a llow prairie dog, to decimate that critical habitat would ring a death kn oll for lar too many ,age grouse. The total ~~reS allucated fo, prai,;e dog inhabitation l, too iarge, and it i. with th i' method of management of the prairie dogs that I find erroneous. I believe that it would be far more productivity to manage the actual population number of prairie dogs as opposed to alioLating acres for prairie dogs to inhabit. It will lake a purposeful calc ul at ion to determine that the sage grouse habitat is critical to that species, and to award the sage grouse their due habitat acres by d isa llowing so many acre, to be overrun by the prairie dogs, The sile of the Category 1 boundary should be shrunk to a manageable , i,e to allow suffiCient amount of acre, ava ilable for the prairie dog' to thrive. and they will survive with fewer than are now dedicated. A very real solution would be to trulV man"ge the actual population numbers of prairie dogs as opposed to the acres The sage grouse ha bitat with in the category 1 boundary should be protected	WY	Both	rmc0043RM
244.	in all the information presented at the recent open house I saw none regarding the effects of predation on the Sage Grouse by all the various predators that frequent the TBNG and surrounding areas. To name a few….red fox, swift fox, coyote, raven / crow, eagles, and various varieties of hawks. Common sense should tell us that all these predatory animals and birds would have a tremendous negative effect on the survivability of the Sage Grouse.	WY	Both	rmc0044RM
245.	When talking about Sage Grouse and their population numbers, all folks that have been around for 40 – 50 years and longer will tell you that there used be a lot of grouse everywhere. They usually go on to say that nothing has changed as far as grazing and habitat goes. In point of fact, there has been one huge change that can be attributed for the decline in Sage Grouse numbers over the last 30 – 40 years. The poison, Compound 1080 has not been in use during that time. When 1080 was widely used, there were few predators of any kind. The fox weren't here yet, there were few eagles, and the 1080 took care of the coyotes	WY	Both	rmc0044RM
246.	Folks, I'm here to tell you that the primary cause of the decline of the Sage Grouse is predation and until you address that, you are spinning your wheels.	WY	Both	rmc0044RM
247.	Many predators prey on the sage grouse, including nest predators, such as coyote, fox, raccoon, skunk, weasels, crows and ravens, as well as other smaller birds and those who prey on juvenile and adult birds, such as eagles, coyotes and fox.	WY	Both	rmc0045RM
248.	I was informed by an FS official that the SG population had been in decline since1968. I believe that the SG population was at a historical high at that time and the predator population was very low, due to many years of predator control. As protection of the eagle and other predators began to take place in the late 1960's, sage grouse numbers began to decline as the result of increased predation and have continued to decline as raptor population increases. I have lived in the area for 15 years and I have observed a marked increase in the number of eagles and other raptors. During the same period I have not witnessed any significant change in sage cover. In fact there seems to be plenty of good SG habitat. In this same time frame I have seen the Sage Grouse population decline in relation to the number of raptors and other predators. If the managing agencies are not willing or able to actively control the raptor / predator population we will never see any meaningful increase in the SG population, regardless of the SG habitat. If you want to have an effective plan to protect the SG population, it must address predation in a way other than just growing more sage brush.	WY	Both	rmc0048RM

Table C-7.B
Comments Related to Wildlife-Birds

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Raven poplulation has increased by 1100% since 1980. A 15 year study by ISU came up with this raven statistic while finding raven are the number one nest egg predator.	All	Both	cfc0002GB
2.	Poor hunting season policy compounded the loss of population by raven nest predation and increased predator numbers as sheep declined.	All	Both	cfc0011RM
3.	I also feel that the ravens and magpies do a lot of predation on the nests.	All	Both	cfc0014RM
4.	What is going to be the issue with the raptor perches that were erected 30 some years ago on the grasslands in an effort at that time to control prairy dogs with raptors? Will they be taken down?	All	Both	cfc0016RM
5.	Hawk clean out birds as soon as they come. We have watched them do this!! Bird come to building for protection as long as hawks and predators are protected by your agencies don't come after me these other issues. I am doing the best I can I wish you would listen to me. I have been here for 45 years.	All	Both	cfc0054GB
6.	Understand the raven (crows) and eagles are contributing to the decline in large numbers - get rid of the ravens/crows!!	All	Both	cfc0057GB
7.	In the 1960' s, I owned the hay meadows that ran near the B.L.M. foothills. Then these foothills were totally overgrazed. My hay meadow would green-up after haying. About five o' clock, bunches of sage hen would fly from the foothills onto my meadow. We had marvelous hunting! Today, the foothills are only slightly grazed in comparison, the meadow is still green, but no sage hens. Why? In my humble opinion, the culprit may be the crow. 40 years ago, one would see a crown occasionally. Today, there are crows everywhere. Bunches of fifty crows are common.	All	Both	emc0029GB
8.	One day, I swathed by a pond. Three half-grown ducks were scared onto the meadow. Five minutes later, I came by the pond. Again, the crows had two of the ducks torn apart. The crow is a smart and aggressive bird. As long as we have large numbers of crows, it will be difficult to increase sage hen numbers!	All	Both	emc0029GB
9.	Avoidance of small and large above ground structures on the landscape by greater sage-grouse is well documented. Buried pipelines present a unique set of challenges because they consist of three main types of structures: 1) the pipeline; 2) pump stations and associated roads; and 3) overhead power lines. Pump stations are permanent aboveground structures that require 5-10 acres and are constructed at approximately 48-50 mile intervals. Pump stations require road construction, which greater sage-grouse will avoid, and overhead power lines, which are likely to increase the number of aerial predators in greater sage-grouse habitat by providing perching areas.	All	Both	emc0034RM
10.	I would like to make the comment that a key component to sage grouse management will be management of ravens. Ravens are proven to eat sage grouse eggs and chicks. We cannot expect to be able to enhance any opportunity to protect sage grouse without addressing this significant factor. We can change everything else in the system like removing grazing, providing waters, etc., but if we do not address the fact that ravens are unmanaged they will continue to be affected. We must manage ravens to protect sage grouse.	All	Both	emc0059GB
11.	Conduct under burns in the pine and fir stands to reduce the fuel load within the Mt. Dome Area of Critical Environmental Concern. This will aid in preventing catastrophic fires on the mountain top and losing the entire stand of timber used by nesting and wintering Bald Eagles in the Klamath and Tule Lake basins.	All	Both	emc0061GB
12.	Other sagebrush obligates, such as the Sage Sparrow and Brewer's Sparrow are in decline, and these species should also considered in proposed management alternatives.	All	Both	emc0068GB, emc0020rm

Table C-7.B
Comments Related to Wildlife-Birds

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
13.	The conclusions of minimal effect of predation do not seem to follow from the discussion, especially as regards corvids. It bears noting that one of the references (Bui, et al., 2010) recommends taste aversion training to discourage ravens from eating sage grouse eggs. Will the bureaucracy consult with Mrs. Obama for insight on the change of diet she hoped for schoolchildren? With a $16 trillion national debt, the bureaucracy is recommending diet therapy for the birds. Ravens are ranked in the category of Least Concern (IUCN, 2011) as regards susceptibility to extinction. They are recognized as subsidized predators in large through their ability to adapt to resources made available by human activity. Due to their wide diet and hunting characteristics, they engage in hyperpredation whereby they can remain in an area and continue to hunt declining species while extending their diet to more abundant prey. In so doing, they continue to threaten the less numerous species rather than move on and relieve the predation pressure. With a 15-fold increase of raven population in the last fifty years, the bureaucracy does not consider that active reduction of ravens merits scientific, let alone policy discussion. In the same time frame, the bureaucracy consistently has neither counted nor reported sage grouse populations, yet asks the taxpayer to accept the bureaucratic conclusion that listing is inevitable.	All	Both	emc0087GB
14.	One of the Mojave desert studies reported by Boarman & Coe (2002) indicates 3.35 ravens per square kilometer. Applying that density to the 284,449 square kilometers comprising the state of Nevada suggests there may be 952,000 subsidized predators available to prey on sage grouse. The 2004 sage grouse count for California and Nevada indicated 88,000 birds (Form). Even were all these sage grouse within the boundaries of Nevada, apparently there are nearly eleven ravens for each sage grouse. Since some of those sage grouse are in California, there actually may be more than eleven ravens per grouse within Nevada. This author recognizes and stresses these numbers must be accepted with care, as they are neither spatially nor temporally consistent. The fact is that readily comparable numbers are difficult to obtain precisely because the agencies consistently gloss over the actual counts of both the subsidized predator and the prey, and they never directly compare the raven and sage grouse populations. Certainly this author's decades of living and working in sage grouse and raven range suggest the eleven-to-one ratio is realistic.	All	Both	emc0087GB
15.	In sage grouse habitat, raven predation of nests essentially is 100% effective, in that whether one or all eggs are taken, the sage grouse subsequently abandon the nest (Bui et al., 2010). With the overwhelming raven population, this assures sage grouse extinction is on the way. Yet the agencies maintain that ranchers, power plants, mines and recreational visitors must be restricted while paying no substantial attention to the actual subsidized predators. In 2010, NDOW allowed the taking of 1,500 ravens to reduce sage grouse predation. That appears to be less than two tenths of a percent of that subsidized predator population. Out of a legislatively mandated budget of $600,000 for predation control, $50,000 were spent on taking these ravens. Fiscal as well as predation control may be an issue. The prime directive of the bureaucracy is growth of the bureaucracy, not growth of the sage grouse population. This is evident since by far the greatest portion of the Form is devoted to regulatory mechanisms. That extensive discussion reads as a rationalization for greater regulatory expansion. Essentially, it states that central planning by an enlarged bureaucracy will improve habitat by restricting or eliminating human activity on or near sage grouse habitat.	All	Both	emc0087GB
16.	Predation and fires are immediate events. Habitat control and management are long term solutions which cannot immediately protect sage grouse from predation and fires.	All	Both	emc0087GB
17.	Idaho Power and other utilities will need to build transmission and distribution lines in the future and these will need to	All	Both	emc0090GB

Table C-7.B
Comments Related to Wildlife-Birds

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	traverse priority and general habitat areas. In some cases, rerouting a line may not be feasible or may be cost prohibitive (e.g., providing distribution service to a customer). We encourage the BLM consider future utility needs and how the constraints implemented through this process can significantly impact the costs and feasibility of future projects.			
18.	There also didn't use to be so many predatory birds. When we were kids you didn't see near as many hawks and especially as many crows. We feel the crows are the number one enemy to the grouse. Conni's father has found crows nests year after year with over 30 sage grouse egg remnants. That's total devastation to the hatches each year. But yet we cannot hunt the crows, nor is an effort made to control them.	All	Both	emc0128GB
19.	I particpated in sagegrouse study in utah in the late 70s we tagged the birds and put radio transmitters on some , the number one cause of mortality , golden eagles.	All	Both	emc0167GB
20.	IIn addition observations suggest that the raven population on the high desert has been steadily increasing. The birds appear to be constantly hunting the grouse habitats, are extremely aggressive and would appear to be very effective predators on young grouse.	All	Both	emc0173GB
21.	Again, anecdotally, I have recently observed 40 - 60 ravens at one time cruising/hunting behind alfalfa swathers and effectively gobbling up any animals exposed or injured by the machines	All	Both	emc0173GB
22.	If you want to know what is devestating the grouse just take a drive from st george to provo and count the number of ravens of the side of the freeway. i counted 52 and was not even looking that hard. i have also seen ravens chasing hawks and taking their kills. get rid of some of the ravens and knock down the coyote population and you will see the grouse come back.	All	Both	emc0186GB
23.	The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival. Nevada's raven population has grown dramatically over the past 25 years and it has been stated we currently have extremely drastic increase in ravens over historic levels.	All	Both	emc0202GB
24.	There has been a steady increase in predator type birds over the past several decades along with the mammalian predators that are not as vigorously controlled as they once were.	All	Both	emc0208GB
25.	The beneficial effects of predator control must be addressed in greater sage-grouse management strategies, especially in areas where habitat changes have faciltated predation. I have seen efforts to poison Ravens and common Crows. Some of the poison eggs were deliberately hidden to see if the Ravens could still find them. They still found every one of them. The most effective approach to limiting the Raven and Crow predation is to focus on controlling Raven and Crow populations, not spending all of our efforts to make the habitat more "sagegrouse friendly".	All	Both	emc0215GB
26.	Birds of prey are directly and negatively impacting the nesting success of sage grouse. In one study completed in Eastern Idaho, birds of prey accounted for over 60% of grouse nesting failures. In addition, birds of prey are negatively impacting adult grouse survival in part due to the installation of man-made perches such as telecom and electricity towers and poles. The conclusion of studies indicating sage grouse avoid elevated structures is only partially correct - they avoid them because of the predators that use them for perches or they are killed and eaten.	All	Both	emc0216GB
27.	YOU PEOPLE NEED TO PAY ATTENSION TO THE STUDY'S THAT WAS DONE ON THE SAGE GROUSE. NEST WAS MADE WITH EGGS IN THEM TO COPY NEST LIKE THE SAGE GROUSE , PREDATORS ATE THE EGGS. AND IF YOU LOOK AT THE EAGLE THAT WAS BROUGHT BACK OFF THE ENDAngered LIST. WAS THIS NOT DONE	All	Both	emc0220GB

Table C-7.B
Comments Related to Wildlife-Birds

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	WITH EGG'S? DID WE HAVE TO TIE UP MILLIONS OF ACRES FOR THE EAGLES? WHAT ABOUT THE CONDOR, DO WE RAISE QUAIL AND PHEASANT FOR RELEASE? YES WE CAN AND DO. IT IS NOT SO MUCH THE SERVIVAL OF THE GROUSE AS IT IS TO HAVE IN PLACE A GROUSE MANAGEMENT TEAM, MORE GOVERNMENT, MORE PAY ROLL, MORE CONTROL. GET ON WITH THE PROGRAM HATCH AND RELEASE. IT'S BEEN DONE BEFORE, IT WORKS,			
28.	I understand too that the population of ravens, crows and magpies has increased greatly since they gained protection in 1972, with the amendment to The Migratory Bird Treaty Act of 1918. Such birds are known to prey on sage grouse nests.	All	Both	emc0236GB
29.	I understand that the population of ravens, crows and magpies has increased greatly after they have gained protection from the 1972 amendment of The Migratory Treaty Act of 1918. These birds prey on sage grouse nests. The necessary and productive grazing industry must not be made sacrificial lambs when many such factors have effect on sage populations.	All	Both	emc0238GB
30.	Measures to limit perching by avian predators should not be required outside of a 0.6 mile distance from the center of a lek.	All	Both	emc0242GB
31.	Limiting ranchers' ability to develop water sources for fear of increasing mosquitos that might carry West Nile is counteractive to increasing sage grouse numbers. Lifting restrictions and allowing ranchers to develop water sources, fence and protect meadows, and allowing regulated shooting of the raven would help boost sage grouse numbers.	All	Both	emc0244GB
32.	The effective range-wide predator and sage grouse occurrence intersection is shown in Figure 2. The Form conclusions of minimal effect of predation do not seem to follow from the discussion, especially as regards corvids. It bears noting that one of the references (Bui, et al., 2010) recommends taste aversion training to discourage ravens from eating sage grouse eggs. Will the bureaucracy consult with Mrs. Obama for insight on the change of diet she hoped for schoolchildren? With a $16 trillion national debt, the bureaucracy is recommending diet therapy for the birds.	All	Both	emc0274GB
33.	In sage grouse habitat, raven predation of nests essentially is 100% effective, in that whether one or all eggs are taken, the sage grouse subsequently abandon the nest (Bui et al., 2010). With the overwhelming raven population, this assures sage grouse extinction is on the way. Yet the agencies maintain that ranchers, power plants, mines and recreational visitors must be restricted while paying no substantial attention to the actual subsidized predators.	All	Both	emc0274GB
34.	In 2010, NDOW allowed the taking of 1,500 ravens to reduce sage grouse predation. That appears to be less than two tenths of a percent of that subsidized predator population. Out of a legislatively mandated budget of $600,000 for predation control, $50,000 were spent on taking these ravens. $40,000 of the actual expenditure was funding separate from the NDOW predation control budget (NDOW, 2012). Fiscal as well as predation control may be an issue.	All	Both	emc0274GB
35.	The nesting phase of the sage grouse life cycle may be critical in addressing predation. The Form states an average clutch size of seven eggs. Since the grouse completely abandon a depredated nest, the actual kill ration becomes 7:1. That is, there are seven grouse killed for each single predation event, whether the predator eats all the eggs or not. With that kill ratio, suggesting predator control provides no significant benefit to the sage grouse flies in the face of both common sense and decency.	All	Both	emc0274GB
36.	Discussion has been tendered that predation control is ineffective since removed territorial ravens simply are replaced by a higher number of transitory ravens (Coates, 2012). Barr (2012b) points out the following regarding this research: The predation control studies indicate the territorial ravens, knowing their normal hunting range, are three times as effective at	All	Both	emc0274GB

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	nest depredation as the transitory birds. When the territorial ravens are removed by predation control, the transitory ravens, no longer harassed out, replace the territorial birds at twice the density. The two replacement birds thus hunt at a combined two-thirds the effectiveness of the removed raven. If the territorial raven takes ninety sage grouse eggs during the nesting cycle, this indicates the two transitory birds will take sixty. Though all ninety sage grouse will not be saved, thirty will be. There is an immediate benefit in using predator control, despite the government scientist and agency bureaucrat conclusions to the contrary.			
37.	The population numbers, hunting effectiveness, and kill ratios allow reasonable planning to immediately benefit the sage grouse. The following may provide a thirty percent sage grouse population growth per year. Additional government personnel will not be required, and the predator control will not interfere with habitat management, locally or range-wide. The plan outlined is most effective if applied throughout the eleven-state sage grouse range, though it will be locally effective and could be initiated sequentially. 2.8.1. Establish harvest rates for predators. This can be locally determined based on local conditions and population counts. For instance, using Boarman and Coe (2002) in Nevada the raven:sage grouse rate could be 11:1. Other predators and prey, such as coyotes and pygmy rabbits, would have specific harvest rates for the predators. 2.8.2. Establish a bounty. This can be a cash amount or it can be a service credit. The cash could be the expected government hunter cost per harvested bird. The cash bounty would simply be paid for submitted wings. The service credit would be an appropriate hunting license for the commensurate harvest rate. In Nevada, submitting eleven ravens would earn a sage grouse license or stamp. 2.8.3. Consider the kill ratios for the life phases of the prey. They may be multipliers to the base harvest rate. For instance, with the sage grouse, the raven kill ratio during the nesting cycle is 7:1. That ratio may be much lower during other phases of the sage grouse life cycle, since subsequent predation events may not kill as many sage grouse in one action. 2.8.4. Enact and then monitor predator and prey population levels. Adjust harvest rates as appropriate. This approach manages the animals, not the people. Significantly, it allows the citizen to be the principal agent in protecting the sage grouse. The current agency policies, as with the unsuccessful spotted owl program, presume government personnel must be intimately involved. Habitat management essentially is a people-management mechanism, and does not directly, certainly does not immediately, help the prey. Habitat management solves the wrong problem at the wrong time.	All	Both	emc0274GB
38.	Immediate predator control is essential for the survival of the sage grouse. Agency numbers indicate that in Nevada there are eleven ravens for every sage grouse. Agencies still insist controlling that significant predator is not a priority. That is like putting one lone player on the football field against a full opposing lineup. The government scientists are telling the lone player not to worry about what will happen after the starting whistle, because the habitat-managing bureaucrats are building the lone player a fine clubhouse	All	Both	emc0274GB
39.	On page 19, Minerals section, second paragraph, there is mention of abandonment of leks by male sage-grouse if leks are repeatedly disturbed by raptors perching on power lines near leks. The mitigation measure or conservation measure should include anti-perching devices on these structures and not prevent mining or energy development. Similarly, predator control of ravens, crows, and magpies (corvids) is possible in identified nesting areas where power lines provide perches for corvids to watch for sage-grouse hens to leave the nest.	All	Both	emc0322GB
40.	Sage grouse standards for wind and transmission lines Wind power generation represents a clean, renewable alternative	All	Both	emc0343GB

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	to fossil fuels, but construction of wind farms in key habitats is likely to lead to unacceptable levels of impact. Although there is little published science directly addressing the impact of wind turbines or transmission lines on sage grouse, there is a broad consensus among biologists that sage grouse avoid tall structures (such as wind turbines and transmission towers) and abandon adjacent habitats. One unpublished study found that sage grouse habitat use increased with distance (up to 600 meters) from transmission lines. It is notable that modern perch inhibitors emplaced on transmission lines result in a major decrease, but not elimination, of raptor perching (Slater and Smith 2010). Molvar (2008) compiled BLM data from a wind power project on Cotterel Mountain, Idaho and was able to determine that the erection of seven meteorological towers led to drastic declines in sage grouse populations across nine sage grouse leks, while populations in the surrounding area remained stable. See Attachment 5. There has been abundant scientific information that other types of energy development, particularly oil and gas, has a major impact on sage grouse populations, and oil and gas development has some similar features such as habitat fragmentation and tall structures (in the form of drilling rigs).			
41.	At minimum, the NEPA analysis should address the following: • Assessing the impacts of permitted activities that increase the nesting populations of ravens (see Bui et al. 2010, Dzialek et al. 2011), an important nest predator, by providing nest platforms, and creating standards to minimize this effect in sage grouse habitats.	All	Both	emc0343GB
42.	We have also not been able to detect in our studies any increased avian predation on greater sage-grouse as a result of the power lines.I\Furthermore, work performed by Dr. James Sedinger of the University of Nevada, Reno, in studying the Falcon to Gondor transmission line in eastern Nevada, has resulted in eight years of data showing that impacts to greater sage-grouse are more attributed to natural predation, wildfire impacts-habitat impacts from cheatgrass invasion, habitat fragmentation, and fitness of females.	All	Both	emc0399GB
43.	Why are there provisions to "have no tanks at well locations within priority areas" for fluid minerals, but no similar provisions for the battery of livestock wells, water tanks, and other elevated structures that exist across the sagebrush biome in occupied sage-grouse habitats? Is the battery of tens of thousands of elevated livestock range development structures all going to be "grandfathered in" and allowed to continue to be in left in place degrading sage-grouse habitats and public wild lands? These elevated structures promote opportunities for nesting and perching by ravens, or elevated raptor perches, or may impact grouse use of an area by providing taller visual intrusions.	All	Both	emc0411GB
44.	A moratorium should immediately be placed on all wind energy development projects, rights-of-way, and MET towers on public lands. Across the range of sage-grouse and the western landscape, very little is known about migration patterns for migratory songbirds and other migrants, including bats and migrating insects like dragon flies. Many areas with the higher wind potential are often ridges or plateau rims, and are also the relatively undeveloped remaining sagebrush wild lands - as these areas typically have shallower soils, or abundant rocks in some areas, or steep drop-offs, rimrocks or cliffs. So these windy areas were not targeted by agencies for livestock sagebrush eradication projects, crested wheatgrass seedings, intensive pasture fencing and pipeline schemes that typically accompanied livestock forage schemes on productive sites. Thus, they are less developed for livestock, and are often better condition remnant habitats that serve as refugia for sage-grouse. Moreover, sage-grouse impacts are but one part of the large-scale adverse impacts of industrial wind facilities. Lethal golden eagle impacts, and impacts to migrating species, are often just not understood in sufficient detail to enable agencies to merely push siting onto non-priority or non-sage-grouse habitats.	All	Both	emc0411GB

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45.	Much more detailed studies of bird and other volant species migration and habitat use patterns must be conducted before any areas can be proposed for wind development on public lands. Across the western landscape, very few studies have been done. Those that have conducted are often overseen by wind developers or in response to threats of development – and may include only spotty observations over a single season. Necessary night-time radar studies over all migration periods and thorough groundbased observation studies have often not been conducted. Storms during migration periods - and especially spring storms – can down migratory birds and alter areas of highest migrant presence. These effects are seldom if ever addressed. The studies we have seen repeatedly point to the most exceptional known high-use areas, such as the Goshute range in the context of raptor migration, as a benchmark for significance of avian use. The studies then try to minimize importance of all other areas by claiming that, for example, ridges in the Great Basin don't have as much raptor use as the Goshute Range. Thus, they are deemed to be of much lesser importance. With Spring Valley Wind, BLM (and NDOW capitulated) knowingly impacted 9% of the North Spring Valley PMU, and further severed habitat connectivity between PMUs. Placing a moratorium on industrial wind development and associated infrastructure on public lands in the sagebrush biome would ensure that adequate knowledge could be gained so that: - Sage-grouse habitats will be effectively protected and conserved. - Conservation actions aimed for sage-grouse do not shift wind development into, and harm, wildlife in other areas – and cause significant harm and mortality to other species whose migration pathways are not known – such as migrating warblers, western tanagers, rare bats like the Townsend's big-eared bat, or into areas where high golden eagle mortality is likely.	All	Both	emc0411GB
46.	The sage steppe is important habitat for th Greater Sage grouse, but also to other species, e.g. Gunnison Sage]grouse, Sage Sparrow, Sharp-tailed Grouse.	All	Both	fla0029gb
47.	The beneficial effects of predator control must be addressed in greater sage-grouse management strategies, especially in areas where habitat changes have faciltated predation. I have seen efforts to poison Ravens and common Crows. Some of the poison eggs were deliberately hidden to see if the Ravens could still find them. They still found every one of them. The most effective approach to limiting the Raven and Crow predation is to focus on controlling Raven and Crow populations, not spending all of our efforts to make the habitat more "sagegrouse friendly".	All	Both	flj0002gb
48.	The U.S. Government has created and developed treaties with other nations to protect natural predators specific to the Greater Sage-Grouse, the Raven. The Raven protected by 50 CFR "Birds Protected by The Migratory Bird Treaty Act" of 1918. This restricts and limits predator control by the state agencies responsible for wildlife and wildlife habitat. The USF&WS is permitted to allow for a specific number of Ravens to be harvested each year. Mr. Mike Conover, a wildlife biologist at Utah State University, states after a four year study in southwest Wyoming that the sage grouse are big birds with big eggs, which make them tempting targets for ravens. Mr. Conover also stated it appears many nests fail because ravens eat the eggs and the young. Mr. Conover also stated that the Raven population booms are in part attributed to human household waste and its availability to the Raven. Although there aren't as many statistics, Conover said the raven population is swelling unchecked in Wyoming, as the birds have few significant predators, this has been the circumstance for Northern Nevada as well. There have been numerous other studies and data prepared that have researched and developed concerning Raven predation that indicate the same results. It is acknowledged that other predators may also have negative impacts to the Greater Sage-Grouse however, the Raven is a protected species and cannot be controlled	All	Both	rmc0026GB

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	without a permit and only within the limits set forth by The Migratory Bird Treaty Act.			
49.	VGC knows from working with BLM to secure authorization for our mineral activities on BLM administered lands, that BLM already has rules and policies to ensure that mineral projects protect sage-grouse habitat. The U.S. Forest Service ("USFS") has similar policies to protect sage-grouse habitat on National Forest System lands. BLM Notices and BLM and USFS Plans of Operations for mineral projects contain numerous permit conditions and stipulations to protect sage-grouse habitat. Examples of these measures include seasonal restrictions on when and where activities can occur, buffer zones around identified sage-grouse leks, limiting constructionof new overhead structures that provide raptors perching sites, and installing anti-perching devices on existing transmission lines.Given the existing regulatory framework under which VGC and other mineral exploration and development companies must operate, we question the need for a completely new policy direction, like that proposed in the NTT Report. Before BLM and USFS "go back to the drawing board" and create new regulatory programs to protect sage-grouse habitat, they should first perform a gap analysis of the existing policies to determine what - if anything - needs to be improved or modified.	All	Both	rmc0029RM, rmc0060GB
50.	iii. Strong components of Wyoming's approach For transmission lines, 2-mile wide transmission corridors have been identified in an effort to colocate disturbances. Construction is prohibited between March 15 and June 30 (or between December 1 and June 30 in winter concentration areas) and within 0.5 miles on either side of the existing transmission lines. If new lines are proposed for core area, they must be either buried or outfitted with raptor per deterrents to minimize avian predation pressure on sage-grouse.	East	Both	emc0089RM
51.	i. Lander, WY RMP Alternative B also requires anti-perching devices to be installed on all new overhead powerlines in greater sage-grouse, white-tailed prairie dog, mountain plover, and pygmy rabbit habitats to reduce predation from raptors. In addition, the BLM will work with ROW holders to identify conflict areas and get anti-perching devices installed on existing overhead powerlines in these same habitats. (DEIS 882) Because approximately 74-80% of sage-grouse females nest within 4 miles of leks (Moynahan 2004, Holloran and Anderson 2005), this measure may help to reduce predation pressures on nesting and foraging grouse. We recommend the use of deterrent devices on H-frame structures because recent research indicates they are effective tools in reducing perch use of such structures (Lammers and Collopy 2007, Slater and Smith 2010). The BLM and FS should consider not only anti-perching devices to reduce raptor predation on grouse, but also measures (not included in the Lander RMP) that would reduce conditions (e.g., nest substrates and anthropogenic attractants) that enhance local raven populations, to reduce potential raven predation on sage-grouse nests. Energy development in undeveloped sagebrush areas has been shown to facilitate increases in the abundance of breeding ravens, with concomitant negative effects on nest survival of sage-grouse (Bui et al. 2010, Coates and Delehanty 2010). Raven predation on grouse nests may have a significantly adverse impact on local grouse populations (Coates 2007). BLM and FS should recommend that any newly permitted permanent, highprofile structures will be outfitted with raven deterrents.	East	Both	emc0089RM
52.	i. Lander, WY RMP Alternative B also prohibits new permanent structures taller than 12 feet within 1 mile of occupied nesting habitat. We strongly support this as a means to prevent area avoidance by sage-grouse.	East	Both	emc0089RM
53.	Additionally, we have noticed a substantial increase of Hawks and Raven popularions in the Virginia Range and question what type of impact the increased populations have on the sage-grouse and there nesting	NVCA	Both	emc0232GB

Table C-7.B
Comments Related to Wildlife-Birds

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
54.	Ravens are ranked in the category of Least Concern (IUCN, 2011) as regards susceptibility to extinction. They are recognized as subsidized predators in large through their ability to adapt to resources made available by human activity. Due to their wide diet and hunting characteristics, they engage in hyperpredation whereby they can remain in an area and continue to hunt declining species while extending their diet to more abundant prey. In so doing, they continue to threaten the less numerous species rather than move on and relieve the predation pressure. With a 15-fold increase of raven population in the last fifty years, the bureaucracy does not consider that active reduction of ravens merits scientific, let alone policy discussion. In the same time frame, the bureaucracy has neither consistently counted nor consistently reported sage grouse populations, yet asks the taxpayer to accept the bureaucratic conclusion that listing is inevitable. One of the Mojave desert studies reported by Boarman & Coe (2002) indicates 3.35 ravens per square kilometer. Applying that density to the 284,449 square kilometers comprising the state of Nevada suggests there may be 952,000 subsidized predators available to prey on sage grouse. The 2004 sage grouse count for California and Nevada indicated 88,000 birds (Form). Even were all these sage grouse within the boundaries of Nevada, apparently there are nearly eleven ravens for each sage grouse. Since some of those sage grouse are in California, there actually may be more than eleven ravens per grouse within Nevada. This author recognizes and stresses these numbers must be accepted with care, as they are neither spatially nor temporally consistent. The fact is that readily comparable numbers are difficult to obtain precisely because the agencies consistently gloss over the actual counts of both the subsidized predator and the prey, and they never directly compare the raven and sage grouse populations. Certainly this author's decades of living and working in sage grouse and raven range suggest the eleven-to-one ratio is realistic.	NVCA	Both	emc0274GB
55.	The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival. Nevada's raven population has grown dramatically over the past 25 years and it has been stated we currently have extremely drastic increase in ravens over historic levels.	NVCA	Both	emc0304GB
56.	In the analysis of Predation Factors contributing to Sage Grouse declines, the ODFW EIS fails to include analysis of the effects that past ODFW and NFWS raptor recovery programs conducted in the western US over the course of the last 40 years have had on increased Sage Grouse populations. Without such information the EIS analysis is incomplete, and one cannot reasonably assess whether the Raptor conservation and recovery programs so far conducted are in themselves a major or significant contributor to regional Sage Grouse Decline. Raptor Recovery efforts and success over the last 4 decades may be measured using data and information from The Audubon Society through Bird Count and other Publications as well as data from the USFWS and numerous local birding groups. Estimates of concurrent increases in Sage Grouse Predation should be examined in relation to this data. The EIS must answer the question; Is the observed declining Sage Grouse population simply responding to increased predation by the increased numbers raptors over their range?	OR	Both	rmc0036GB
57.	The practice of erecting artificial hawk nests or raptor perches that have taken place in some of the winter grounds of the sage grouse can't be good for the grouse as it enables their natural enemies (eagles) a perfect opportunity to infiltrate the wintering ground.	UT	Both	emc0295GB
58.	The practice of erecting artificial hawk nests or raptor perches that have taken place in some of the winter grounds of the sage grouse can't be good for the grouse as it enables their natural enemies (eagles) a perfect opportunity to infiltrate the	UT	Both	emc0296GB

Table C-7.B
Comments Related to Wildlife-Birds

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	wintering ground.			
59.	There are a great deal more raptors in NE Wyoming than there were 40-50 years ago, and while I'm not recommending killing eagles, that factor should be strongly considered in lower grouse numbers.	WY	Both	cfc0018RM
60.	There are many natural threats to grouse which seem to get very little attension. In our area, expansion of and distruction of sage brush by prairie dogs is a very real threat which could be greatly avoided by active control of prairie dogs. Another problem which probably can not be addressed is the predation by large raptors. We are seeing as increase in these, particularly eagles, which certainly have a bearing on Sage Grouse survival, as well as dissturbance at leks.	WY	Both	cfc0032RM, rmc0025RM
61.	The Bentonite Road in Valley County is recognized as one of the best places to see a mountain plover. The RMP should preserve the current management of that habitat.	WY	Both	emc0013RM
62.	iii. Strong components of Wyoming's approach For transmission lines, 2-mile wide transmission corridors have been identified in an effort to colocate disturbances. Construction is prohibited between March 15 and June 30 (or between December 1 and June 30 in winter concentration areas) and within 0.5 miles on either side of the existing transmission lines. If new lines are proposed for core area, they must be either buried or outfitted with raptor per deterrents to minimize avian predation pressure on sage-grouse.	WY	Both	emc0089RM
63.	i. Lander, WY RMP Alternative B also requires anti-perching devices to be installed on all new overhead powerlines in greater sage-grouse, white-tailed prairie dog, mountain plover, and pygmy rabbit habitats to reduce predation from raptors. In addition, the BLM will work with ROW holders to identify conflict areas and get anti-perching devices installed on existing overhead powerlines in these same habitats. (DEIS 882) Because approximately 74-80% of sage-grouse females nest within 4 miles of leks (Moynahan 2004, Holloran and Anderson 2005), this measure may help to reduce predation pressures on nesting and foraging grouse. We recommend the use of deterrent devices on H-frame structures because recent research indicates they are effective tools in reducing perch use of such structures (Lammers and Collopy 2007, Slater and Smith 2010). The BLM and FS should consider not only anti-perching devices to reduce raptor predation on grouse, but also measures (not included in the Lander RMP) that would reduce conditions (e.g., nest substrates and anthropogenic attractants) that enhance local raven populations, to reduce potential raven predation on sage-grouse nests. Energy development in undeveloped sagebrush areas has been shown to facilitate increases in the abundance of breeding ravens, with concomitant negative effects on nest survival of sage-grouse (Bui et al. 2010, Coates and Delehanty 2010). Raven predation on grouse nests may have a significantly adverse impact on local grouse populations (Coates 2007). BLM and FS should recommend that any newly permitted permanent, highprofile structures will be outfitted with raven deterrents.	WY	Both	emc0089RM
64.	i. Lander, WY RMP Alternative B also prohibits new permanent structures taller than 12 feet within 1 mile of occupied nesting habitat. We strongly support this as a means to prevent area avoidance by sage-grouse.	WY	Both	emc0089RM

Table C-7.C
Comments Related to General Biological Resources

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Make sure all federal lands are included in the conservation plan. Use the best available conservation biology science.	All	Both	cfc0015GB
2.	For too long, management of these lands has focused first on the needs of humans who wish to use the area: miners, ranchers and recreation users. While these individuals certainly may have legitimate interests in making use of these lands, their needs and desires must be subordinated to the scientifically based needs of the native wildlife of the lands if proper management is followed. Only through this approach can the flora and fauna of these lands be adequately protected and the BLM and Forest Service fulfill their responsibilities.	All	Both	emc0065GB
3.	What is important in resource management is first identifying what you have and then designing a management strategy to get where you need to go. In the science of range resource management, you need an experienced range ecologist to accomplish this task. They are few and far between and they cannot be replaced by biologists. The agencies must use seasoned professionals with expertise in range ecology to develop realistic sagebrush management strategies in order to be effective in managing sage-grouse habitat.	All	Both	emc0070GB
4.	We urge that this planning process embrace an ecosystem approach to management of the full suite of sage-obligate species, and consciously strive to provide conservation benefits to pygmy rabbits, and other flora and fauna.	All	Both	emc0078GB
5.	Monitoring: Methodology of monitoring should be flexible enough to allow local input and modifications on the adaptability of the species. Monitoring should compel decision-making for adjustments in multiple-use activities only when adequate data justifies decisions. FLPMA and the land use planning regulations call for BLM to maintain a current inventory of the public lands and to collect updated information about ecological conditions in preparing land use plans. See 43 U.S.C. § 1711(a); 43 C.F.R. § 1610.4-3. Moreover, this information is essential for BLM's analysis of greater sagegrouse impacts and alternatives in the RMP/LMP EIS/SEIS processes, as BLM recognized in its 2004 National Sage-Grouse Habitat Conservation Strategy, Section 1.3.1, pp. 2-4 (Docket No. 90-5). In accordance with the Memorandums of Understanding (MOUs) between Public Lands Council (PLC) and both BLM and FS, (WO 220-2004-0 and NO. 09-SU-11132421-171, respectively), the agencies should work cooperatively with permittees to collect data and accept monitoring data collected by permittees.	All	Both	emc0140RM
6.	Whenever the BLM determines that ecological conditions on an allotment or pasture are not meeting the Fundamentals or the Standards and Guidelines it is imperative to take a "good look" to determine if grazing is impacting the condition of a plant community and how it is happening. The BLM assessments using Standards of Rangeland Health has limitations in the elements that can identify the cause and effects of resource condition, because it is more qualitative than quantitative. Where areas fail to meet the standards, a close look must follow to rigorously quantify the resources to determine if the process failed to take into account natural factors, livestock use, or other BLM activities. As stated above, this may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.	All	Both	emc0159GB emc0222GB emc0209GB
7.	Whenever the BLM determines that ecological conditions on an allotment or pasture are not meeting the Fundamentals or the Standards and Guidelines it is imperative to take a "good look" to determine if grazing is impacting the condition of a plant community and how it is happening. The BLM assessments using Standards of Rangeland Health has limitations in the elements that can identify the cause and effects of resource condition, because it is more qualitative than	All	Both	emc0179GB

Table C-7.C
Comments Related to General Biological Resources

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	quantitative. Where areas fail to meet the standards, a close look must follow to rigorously quantify the resources to determine if the process failed to take into account natural factors, livestock use, or other BLM activities. As stated above, this may require numerous, rigorous studies and we hope to see a full discussion of the research and study gaps that must be addressed in conjunction with the multiple uses on public lands for the conservation of sage grouse.			
8.	Livestock grazing also causes numerous indirect effects that can negatively impact sage-grouse. For example, in addition to direct competition with sage-grouse for rangeland resources, livestock may also create similar competition for other species such as mule deer, white-tailed deer, elk, pronghorn, and bison. This competition may alter the distribution of these species, which may be particularly important when management for one species is in potential conflict with sage-grouse. One example would be the removal of sagebrush for improvement of elk range. Additionally, livestock can often indirectly spread invasive species or weeds, such as cheatgrass, which can negatively impact sagebrush survival and alter the fire-risk of an ecosystem	All	Both	emc0276GB
9.	ii. Range of alternatives should not be more restrictive than an Endangered Species Act ("ESA") Listing The agencies' objective in launching the RMP revision process is to "conserve sage-grouse and its habitat and potentially avoid an ESA listing...21 While the prospect of a sage-grouse listing and its regulatory consequences may be daunting, the restrictive measures recommended by the National Technical Team may be even more so. Indeed, the ESA permits the Fish and Wildlife Service to at least consider each proposed action individually, taking into consideration the site-specific circumstances, species and habitat conditions, potential effects to the species, and potential mitigating actions. While "take" of listed species is prohibited under the ESA, there are opportunities for take permits. By contrast, some National Technical Team recommendations would put millions of acres of public lands off limits from mineral entry or arbitrarily cap disturbance regardless of sitespecific species occurrence and habitat conditions, or mitigation opportunities that might be offered by the project proponent. In deciding what conservation measures should be imposed to avoid a listing, the agencies must consider whether the measures proposed may cost more than the ESA listing it is attempting to avoid. The irony of the agencies' purpose to avoid a listing and the BLM National Technical Team's recommended conservation measures is highlighted by the Technical Team's proposal to withdraw from mineral entry priority sage-grouse habitat areas.22 The Technical Team also recommends a 3% surface disturbance cap in priority habitat.23 Such blanket prohibitions that admit no exceptions based on habitat conditions and quality, species occurrence, or mitigation that might be offered by the project applicant are at once inflexible and draconian, evidencing a singularity of purpose that directly contradicts the agencies' multiple-use mandates. By contrast, an ESA listing does not automatically put off limits all projects that might adversely affect the species or its critical habitat within its range. In fact, the ESA specifically provides processes to obtain "take" authorization for both private projects and those with a federal nexus. For private projects that might result in "take"-defined broadly to include any activity that would or would attempt to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect a species, 50 C.F.R. § 17.3-an applicant can obtain an Incidental Take Permit under ESA Section 10 after preparing an approved Habitat Conservation Plan. 16 U.S.c. § 1539(a)(l)(B); 50 C.F.R. § 17.22(b)(l)(iii). A Habitat Conservation Plan specifies the actions that will be taken by the project applicant to minimize and mitigate effects to the listed species. Measures can be as varied as avoiding Impacts by relocating project facilities, minimizing impacts through timing restrictions and buffer zones, rectifying impacts by restoration and	All	Both	emc0277GB

Table C-7.C
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	re-vegetation, and compensating for impacts by habitat restoration or protection at an offsite location.24 The Fish and Wildlife Service can issue an incidental take permit if after considering the effects and committed mitigation measures, the taking will not appreciably reduce the likely survival or recovery of the species as a whole. 50 CF.R. § 17.22(b)(2). Similarly, when an agency such as BLM permits an activity that is likely to adversely affect a listed species, it must initiate Section 7 consultation with the Fish and Wildlife Service to ensure that the proposed action will not jeopardize the continued existence of the species. 50 C.F.R. § 402. 14(a). The Service issues a Biological Opinion to determine whether jeopardy will occur. /d. § 402.14(g). The Service may take into consideration any conservation measures or other agreements between the action agency and the project proponent, including commitments to mitigate and minimize impacts. See Selkirk Conservation Alliance v. Forsgren, 336 F.3d 944, 956 (9th Cir. 2003). Thus, in both the Section 10 and Section 7 context, there is no absolute prohibition on activities that might "take" species. Rather, project approval is based on whether, after applying the mitigation measures proposed by the applicant, the action will appreciably reduce the likelihood of the survival or recovery of the species, or result in jeopardy, respectively. The ESA permitting processes encourage cooperation between the Service and the applicant to find solutions that both allow the applicant's project to move forward while conserving the species. The mineral industry is familiar with ESA processes and has worked successfully with the Fish and Wildlife Service over several decades to ensure mining operations do not place listed species such as the Lahontan cutthroat trout in jeopardy. Whatever conservation measures the agencies ultimately implement in its various RMPs, they should encourage similar collaboration for species conservation and avoid industry-stifling blanket prohibitions that fail to take into consideration individual project proposals and site-specific circumstances. Barrick encourages the agencies to consider, and incorporate in their management plan revisions, alternatives that provide flexibility to the agencies to work with industry toward effective conservation while permitting multiple uses of the public lands.			
10.	However, as described above, fences can provide time-control, and proper grazing can significantly improve rangeland function and GSG habitat, improving vital rates and increasing populations. If used properly, fence benefits to rangeland function outweigh the negative effects. Large herds and large pastures are preferential than small herds and small pastures from and economic and ecological perspective.	All	Both	emc0281GB
11.	SGI efforts are focused on priority areas, which were identified by working with Utah Division of Wildlife Resources and sage grouse biologists in Utah.	All	Both	emc0300GB
12.	NRCS, in conjunction with numerous partners, has funded three 3-year SGI rangeland ecologist positions in Utah. These positions are 100% focused on planning and implementing projects to benefit sage grouse.	All	Both	emc0300GB
13.	The TRCP values our fish & wildlife resources and encourages you and your staff to establish options that ensure responsible energy development in a way that sustains sage grouse. The TRCP's recommendations and priorities regarding management of fish and wildlife during energy development are organized under the five fundamental areas of Funding, Accountability, Coordination, Transparency and Science (FACTS). The IM's issued must take these areas into account for the national planning strategy to be successful. In 2006, the TRCP released the "FACTS for Fish and Wildlife," specific recommendations for balancing fish and wildlife needs with the development of energy resources. Revised in 2011, the current FACTS document updates those recommendations, expands their applicability to broader	All	Both	emc0380GB

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	geographic regions, and addresses forms of energy development beyond traditional oil and gas. The FACTS revision will allow for fish and wildlife stewardship through better policy and management during energy development. The FACTS recommendations are applicable, with a few exceptions, to land and water, traditional or renewable energy, public or private lands, and infrastructure associated with development. They can increase our ability to responsibly manage fish and wildlife during energy development, balance competing values, become conservation stewards and ensure a future for our fish and wildlife populations. These practices – driven by the FACTS – will sustain and uphold our nation's shared natural resources and unique outdoor legacy.			
14.	Funding is required for adequate fish and wildlife management. Historically, fish and wildfire programs are underfunded or rely on funding sources other than federal monies. While funding alone will not solve the problem, it plays a critical role in our ability to balance energy development with the needs of fish and wildlife. Funding must be secure, substantial and properly allocated to make a difference. TRCP recommends that you: · Determine adequate funding for sustainable fish and wildlife management, including monitoring, in areas proposed for energy development. · Prior to development, identify and secure appropriate funds for fish and wildlife monitoring and mitigation, including compensation if necessary or required. · Establish a long-term, dedicated "mitigation trust" to benefit fish and wildlife that is funded by royalties, rents, fines or voluntary payments. · Ensure that funds designated and intended for fish and wildlife management are not redirected to other causes. · Work cooperatively with various funding sources to leverage additional federal or state grants.	All	Both	emc0380GB
15.	Accountability entails accepting responsibility for actions. On public lands, promises are made through various decision strategies and should be considered "contracts with the people" that mandate proper stewardship of the nation's lands and minerals. TRCP recommends that you: · Proactively address fish and wildlife management needs with a specific "conservation strategy" for each energy field or project. Finalize conservation strategies before development starts and specify recommendations and actions to minimize impacts and establish plans for mitigation, detailed monitoring and adaptive management. · Establish and update regularly a system of tracking commitments, in plans or agreements, along with any actions contrary to those commitments. · Ensure that laws, regulations and policies intended to conserve and protect fish and wildlife during energy development are not abdicated or abridged. · Utilize lease development plans or master lease planning to evaluate and address potential impacts to fish and wildlife prior to development. · Notify the public and allow public comment on energy development projects involving public lands or resources. Provide the public with information regarding modifications to current development plans.	All	Both	emc0380GB
16.	Coordination is essential in ensuring that fish and wildlife are properly managed, within and across administrative boundaries. All stakeholders must be involved, and experts that manage fish and wildlife at the local, state or national levels must be included in energy project planning and implementation. Coordination enables unanticipated or unforeseen actions that arise during development to be addressed in a timely and appropriate manner. A key stakeholder in the administration of public lands and fish and wildlife resources, the public must be included to build trust and brainstorm management tactics. TRCP recommends that you: · Foster broad-based coordination between fish and wildlife managers, landowners and affected stakeholders to ensure fish and wildlife sustainability. · Establish expanded coordination across geopolitical boundaries between property owners (public and private). Coordination	All	Both	emc0380GB

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	between the Wyoming Game & Fish Department, US Fish & Wildlife Services, and other federal and state land agencies must occur to ensure consistent and comprehensive management objectives across geo-political boundaries. · Ensure that managers consider the crucial habitats as well as movement or transitional corridors of fish and wildlife. · Coordinate among all affected stakeholders during planning and implementation of public-lands energy projects. · Include state fish and wildlife agencies in energy development planning and the monitoring of fish and wildlife during and after development. · Establish a process for annual review and adjustments of actions that affect fish and wildlife. An adaptive management strategy is appropriate if based on established adaptive management guidelines and science.			
17.	Transparency is essential to building trust among stakeholders and the general public. Transparency can prevent unnecessary delays, legal actions or bad press. Openness during energy development enables fish and wildlife management that benefits all stakeholders, not just project proponents. TRCP recommends that you: · Identify "special places" with exceptional resource concerns or values where energy development should not be allowed. Map these locations and incorporate these values into management plans. · Continue to provide up-to-date information through a range of media and informational outlets to the public and fish and wildlife managers regarding energy development projects. · Direct and manage leasing and development using complete and up-to-date baseline information on fish and wildlife resources. · Utilize coordinated plans for energy development and fish and wildlife management. · Provide the public with information about all proposed public-lands energy leases and development; allow sufficient time for public comment. · Ensure that all meetings related to public lands use and energy development part of the public record.	All	Both	emc0380GB
18.	Science is the foundation of sustainable land and resource management. It is essential to understanding how fish and wildlife react to energy development and maintaining sustainable populations during and after development. Utilizing peer reviewed and published science enables a balanced approach that sustains both energy AND fish and wildlife instead of either energy OR fish and wildlife. TRCP recommends that you: · Utilize science, including most current published science in all fish and wildlife decisions, particularly when specific research has been conducted on the impacts of energy development. For your convenience, a list of recently published literature has been attached to this letter. · Assure that mitigation and monitoring based on new scientific information is implemented in the energy development process. · Incorporate science-based mitigation, using tested and proven methods of adaptive management, when making decisions about fish and wildlife management and energy development. Identify and address "gaps" in science prior to development and implement coordinated research to address these gaps. · If necessary, utilize a third-party review of development and mitigation proposals. · Establish a credible and qualified "science review team" and engage science-based organizations for fish and wildlife management and development decisions. · Establish a process to incorporate new information and science into planning and implementation of existing and new energy projects.	All	Both	emc0380GB
19.	Developing and implementing conservation strategies at regional or landscape scales will have the greatest benefit for sage-grouse and sagebrush steppe (Holloran 2005). Protecting large expanses of sagebrush steppe and current populations of Greater Sage-grouse are the highest priority (Connelly et al. 2011a; Wisdom et al. 2005c). Establishing a system of habitat reserves in sagebrush steppe will help conserve habitat components and ecological processes important to species conservation. Sage-grouse are a useful, if imperfect, umbrella species1 for sagebrush steppe. A suite of sagebrush birds are declining and would benefit from increased protection of sagebrush steppe (Knick et al. 2003).	All	Both	emc0391GB

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	Rich et al. (2005: 602) contended that "conservation of Greater and Gunnison Sage-grouse populations in reasonable numbers well distributed across their historical ranges also will provide for the conservation of many, or even most, other bird species that co-occur with these grouse." Rowland et al. (2006) also found that conserving Greater Sage-grouse may benefit other species, particularly sagebrush obligate wildlife. Given the importance of public lands to sage-grouse conservation; the sensitivity of these lands to disturbance, longer recovery periods and variable response to restoration; and their susceptibility to invasion by exotic plants (Knick 2011), land uses that negatively affect these lands should be restricted or eliminated in key habitat areas to conserve sage-grouse habitat.			
20.	Habitat loss and mismanagement. Issue: Sagebrush steppe is among the most imperiled landscapes in North America; millions of acres have been lost to crop agriculture, urban development, and other land uses, while remaining sagebrush habitat is degraded and fragmented by gas and oil drilling, livestock grazing, unnatural fire, invasive species, roads, fences, utility corridors and related effects. Habitat loss and degradation continues and efforts to protect and restore sagebrush steppe are inadequate, ineffective and hampered by myriad factors.	All	Both	emc0391GB
21.	The EIS needs to examine the different habitat factors that exist over the range occupied by Sage Grouse. The overall habitat in Nevada, which is a Basin and Range region, is quite different than the rolling sagebrush plains of Wyoming. It is critical that the EIS acknowledge the differences in physiography and habitat characteristics which exist over the range occupied by the Greater Sage Grouse.	All	Both	emc0397GB
22.	Furthermore, in the process of developing the conservation reserve design for Greater Sage-Grouse under whichever landscape-scale ecological assessment is used, the following criteria must be considered: Locations that support other sensitive biological resources, including: federally designated and proposed critical habitat; significant populations of federal or state threatened and endangered species; significant populations of sensitive, rare and special status species; and rare or unique plant communities;	All	Both	emc0407GB
23.	Landscape-level biological linkage areas required for the continued functioning of biological and ecological processes and allowing for long-term shifts in distribution of native species in response to climate change;	All	Both	emc0407GB
24.	Areas that support a geophysical or other ecosystem processes upon which sensitive biological resources depend.	All	Both	emc0407GB
25.	Many of the older Land Use Plans had goals or objective to improve specific ecological conditions sagebrush habitats, meadow habitats, riparian habitats, mountain mahogany communities, etc. To what degree have these goals been met, and has the ecological condition been improved? Where? To what degree? How have flows (where records are available, for example from Water Inventories in Nevada) changed over time? How many wet meadow or spring areas have been lost since the Plan was put in place?	All	Both	emc0411GB
26.	When was the last ESI (Ecological Site inventory) done for all affected lands? What did it show? What does updated ecological analysis show? Has BLM changed how it does analysis? What areas never had SVIN or ESI inventories?	All	Both	emc0411GB
27.	A valid and complete environmental baseline of habitat quality, quantity and threats must be provided for the effects of development scenarios to be understood. This effort must first answer basic questions such as: How much loss of critical habitat components has already occurred - including desertification and loss of site potential, water tables, etc.? How much further loss of adequate sagebrush understories, microbiotic crusts and structurally complex sagebrush	All	Both	emc0411GB

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	cover will occur if all the livestock water pipelines, fences, near-status quo stocking rates, high use levels/standards are allowed to continue- and the new developments under the Scenario are allowed to occur? How much irreversible loss and harm (such as cheatgrass or medusahead invasion) will occur? In arid sagebrush lands, placing water developments in uplands results in a bulls-eye pattern of depletion emanating outward from the water sources (with variations taking topography into account). With continued high stocking, and high use levels, no controls on trampling disturbance, and retention of existing livestock facilities - the depletion continues and recovery of damaged areas is not possible. Continuing or expanding facilities, or renewing grazing permits at levels above the use that has actually been occurring, must be fully taken into consideration here. All of this is of course dependent on what the current baseline and environmental conditions are, including how severe current threats and risks of continuing disturbance activities may be to all components of all sage-grouse seasonal habitats and lands necessary for restoration.			
28.	Please consider effective management strategies for the Greater Sage-grouse as a viable, valuable outlet for those efforts that will protect not just a few threatened species, but an entire ecosystem capable of inspiring future generations of Americans lucky enough to spend a bit of time out in the sage	All	Both	fla0086gb
29.	It is evident that ecosystemic deterioration, rise in health degradation, and threats to population dynamics of wildlife and plant communities can be directly attributed to habitat destruction.	All	Both	fld0002RM, fld0002GB
30.	Management of habitat for the greater sage-grouse occurs on a complex sagebrush dominated landscape with tremendous variability locally and range wide. It is ecologically impossible to regulate for improved sage-grouse performance with species specific regulatory measures. Local citizens working together to resolve local and site specific issues offers the best chance for success. Considerable work has already been accomplished at the local level in planning for improved vegetative management. To date the agencies have failed to implement the majority of these planning efforts. Agencies should prioritize and implement these measures before increasing regulatory control that often paralyzes needed action. Therefore, I strongly urge the agencies to recognize the benefits of livestock grazing to greater-sage grouse and to prioritize their focus on those issues that pose a real and specific threat to the greater sage-grouse and its habitat.	All	Both	flj0000GB
31.	t is evident that ecosystemic deterioration, rise in health degradation, and threats to population dynamics of wildlife and plant communities can be directly attributed to habitat destruction.	All	Both	flld0002RM
32.	it is important that this does not become a single species management plan that could be detrimental to other species in the sage grouse habitat area.	All	Both	fxc0012GB
33.	The West must be protected as a contiguous whole on a large scale for historic native species as well as on a site-specific scale. Conservation biology must be integral to any meaningful sage grouse protection plan, including landscape scale, bioregionally planned biological core habitat areas, migration and dispersal corridors, wild rivers, and riparian areas considerations.	All	Both	rmc0039GB
34.	The Board is supportive of "implementing management actions after land health and habitat evaluations." However, managing" ... for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve sage-grouse seasonal habitat objectives" is not practical. Historic management practices and landscape alterations, coupled with the introduction of noxious weeds and catastrophic wildfire have effectively eliminated the	All	Both	rmc0050GB

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	"reference state" condition. The focus should be on maintaining vegetative resilience and resistance by maintaining critical ecological processes identified by the reference state, and avoiding the crossing of ecological thresholds. Every effort should be made to achieve this including the utilization of the best available indigenous science and knowledge combined with the use of all management tools, including grazing, herbicides, mechanical treatments, and nonnative adapted plant materials.			
35.	We have identified habitats that are approaching ecological thresholds, which when crossed will either eliminate the area as habitat or will require extensive and expensive work to rehabilitate the habitat. NNSG would like to see specific habitat management conservation measures that are pro-active, not just reactive. These pro-active measures should be based on ecological site descriptions (ESDs) and state and transition models (STMs), where available.	All	Both	rmc0051GB
36.	The entire subject of habitat restoration demands more attention and greater clarity from the scientific community. Considerable published, quality data, unpublished scientific and economic data, and experience now exist. Some covers many decades. (eg. Young and Clements; Cheat Grass, Fire and Forage on the Range; University of Nevada Press, 2009) Wishful thinking and popular notions cannot overcome biological and economic realities.	All	Both	rmc0063GB
37.	Please extend comment periods. Maps, GIS Data, etc are not even available online.	All GEN	Both	cfc0003GB
38.	No actions should be more restrictive than that required from a biological assessment and subsequent biological opinion should sage-grouse become listed. For example, withdrawal of mineral activities should not be a default stipulation, or "conservation measure", taken without a full analysis warranting the decision.	All GEN	Both	emc0103GB
39.	Take a step back from the constant monitoring and studying of the sage grouse. They are becoming a species that could be studied to death. Stay away from lek areas, don't do fly overs or egg counts for a period of time and see if their numbers are able to increase on their own without interference. Educate public land users on known sage grouse sites (ie leks, rousts) and tell them to try to avoid them.	All SG-GN	Both	emc0241GB
40.	For the record we believe in the efforts to protect all species, yet strongly deem that the efforts need to be realistic in nature and based on science - which isn't completely the case in the Instructional Memorandum.	CO	Both	emc0056RM
41.	Ecosystem level planning and strategies should be employed in addition to species-specific analyses. The Endangered Species Act provides that "t]he purposes of this Act are to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, [and] to provide a program for the conservation of such endangered species and threatened species[.]" 16 U.S.C. § 1531(b). An assessment tool or evaluation strategy approved by USFWS should be used to quantify the interim and permanent impacts (injury) to habitats (direct, indirect and cumulative) and the ecological services provided by those habitats. This will enable a more accurate, predictive approach to impact mitigation.	GB	Both	emc0355GB
42.	A scientific panel selected by the Bureau of Land Management outlined conservation measures that are an important starting point for effective conservation, in the 2011 'Report on National Greater Sage-Grouse Conservation Measures'. We recommend conservation biology recommendations be followed and large areas of functional, unfragmented habitat be conserved.	GB	Both	emc0404GB
43.	Sound scientific research indicates that grazing is beneficial to the greater sage-grouse and other flora and fauna in	GB	Both	rmc0056GB

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	multiple ways. Grazing reduces the instances and severity of wildfires. (Launchbaugh et al. 2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et al.1994, Evans 1996). It has also been used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994).			
44.	habitat restoration: While Sage Grouse habitat restoration is something which nearly everyone can support, there is much disagreement over what restoration actually means, how to achieve it, and how to evaluate whether restoration efforts are effective or not. The proposed EIS is a good forum for a robust public discussion of restoration. Does it mean conditions before Native Americans arrived in sagebrush country about 12,000 years ago? before white settlers arrived 160 years ago? or does it mean as much ecosystem functionality which can be achieved, given existing uses, our inability to stop weed invasion or to control increasing carbon in our atmosphere or "manage" increasing droughts or other weather disturbances? And, is "restoration" different regionally or in each PMU area? We believe it will facilitate public support of restoration of Sage Grouse habitats if there is more clarity on what this means. The EIS should contain conservation measures which set and enforce habitat restoration goals for all Sage Grouse habitats - priority, general, and recovery habitats. a. the agencies should examine the assumed benefits to Sage Grouse of projects to remove pinyon-juniper woodlands. Is pinyon-juniper "invasion" simply a recolonization of areas denuded of trees more than a century ago for mining, a response to millennial influences of woodland expansion/retraction in the Great Basin, or a response to management practices (overgrazing reducing competition from grasses)? In any event, the agencies should prioritize changing management actions which are conducive to pinyon-juniper expansion before spending limited funds to eradicate trees. B. the agencies should include Sage Grouse habitat requirements in restoration objectives, including sagebrush cover and desirable understory plants. C. the agencies should prioritize expenditures of weed suppression funds for use in priority Sage Grouse habitats, with specific quantified objectives. D. the agencies should take additional actions to avoid or minimize the spread of invasive weeds in priority habitats. E. the agencies should prioritize the use of native seeds and preservation of native vegetation in priority habitats. F. the agencies should establish seed harvest areas adjacent to burned areas. G. the agencies should develop and implement methods for prioritizing and restoring sagebrush steppe invaded by nonnative plants. H. the agencies should evaluate the costs and benefits of using livestock grazing to improve priority habitats, especially the undesirable adverse impacts on native vegetation and facilitation of weed invasions. I. the agencies should evaluate other pest control programs, such as Mormon crickets, for unacceptable impacts on Sage Grouse and their food sources and modify to meet habitat requirements. J. the agencies should disclose in the EIS that funding for restoration and rehabilitation is not assured as it is subject to annual agencies' budgets and Congressional directions.	NVCA	Both	emc0283GB
45.	The Horse Ridge/Brothers/Hampton high desert area is on the far western edge of the North American sage grouse range. It's in a very low precipitation area with extremely low presence of surface water and is dominated by low density low sage relative to habitats in the more central parts of grouse range. Wet meadows and well-distributed riparian areas are almost non-existent. Thus populations in the high desert area could be expected to fluctuate more widely and likely are not as dense as are populations further east in Oregon as well as Idaho, Utah and Wyoming. The core area map of ODFW reflects this to some extent	OR SG-GN	Both	emc0173GB

Table C-7.D
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	There is no mention of impacts and competition from elks, antelope, deer and other wildlife on vegetation and vegetative cover.	All	Both	cfc0006RM
2.	How is the sage grouse habitat within the prairie dog category 1 going to be dictated were they may overlap each other? Is there a "happy medium" that can be achieved to support both sage grouse and hi population prairie dogs?	All	Both	cfc0016RM
3.	Control prairie dogs encroaching into sagebrush areas.	All	Both	cfc0018RM
4.	"Retirement of grazing privileges in priority sage grouse area." NO! May use deferred/rotational grazing. Sage grouse at their most plentiful were co-existing with large grazing animals. You would still have antelope, deer and elk in some places. Fox, Swift fox, skunks and badgers are likely more destructive than cattle or sheep.	All	Both	cfc0025RM
5.	Pocket gophers churn the soil, providing greater moisture capture which leads to thicker plant growth. Pocket gophers seem to be spreading. How will this impact the sage grouse?	All	Both	emc0013RM
6.	Can sage grouse get the plague from prairie dogs?	All	Both	emc0013RM
7.	Will wolves increase predation on sage grouse or reduce predation by killing coyotes?	All	Both	emc0013RM
8.	The EIS should include a study (or plan for a study) evaluating the impact of individual ranches' approach to coyote control on the local sage grouse numbers.	All	Both	emc0013RM
9.	The EIS must include a solid study of the impact of coyotes on sage grouse populations.	All	Both	emc0013RM
10.	The EIS should estimate how much the coyote population would increase and how much the sage grouse population would decrease if the ranches were not putting pressure on the coyote population.	All	Both	emc0013RM
11.	The two biggest threats to sage grouse habitat areas are wild fires and large ever expanding prairie dog towns. The USFS and the BLM are both very negligent in their efforts to control the destruction of sage grouse habitats by the wild fires and they have made no attempt to control the complete obliteration of sage grouse habitat areas caused by the expanding number of prairie dogs.	All	Both	emc0148GB
12.	Copy of the policy guidelines call for reduction of livestock grazing on public lands. Historically, sage grouse and other species such as antelope have followed livestock grazing patterns and flourished where ranchers are allowed to care for the rangeland	All	Both	emc0244GB
13.	We have successfully implemented cool season burns, chemical, mechanical treatments to thin brush and release herbaceous vegetation (Danvir 2005). The overall effect is early season openings in a sagebrush sea. Hunnicutt 1992 clearly showed that hens selected nest sites in homogeneous sagebrush patches at least 300m in diameter for nesting, but immediately moved broods to highly heterogeneous areas having an interspersion of sagebrush cover and grass-forb dominated feeding areas. Pronghorn populations (Aoude and Danvir 2002) showed similar production and population increases.	All	Both	emc0281GB
14.	We know little about the effects of fragmentation on terrestrial predators. Kuipers (2004) pointed out that the popular trapping literature describes canine predators using roads, although this is absent from the scientific literature. Although these observations are intriguing, they must be tested with planned experiments. These would include searching for evidence of canine predators in both roads and other areas and considering differences in detectability in roads and in other habitats.	All	Both	fxc0011gb
15.	Several ranches in the Fort Peck Lake watershed participated in a riparian enhancement and repair project. We were given forms to monitor the health of the riparian area. These forms include an estimate of trailing and bare ground due to livestock.	MT-RM	Both	emc0013RM

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	On our ranch, these sites have scattered deer droppings, deer beds, and deer tracks. One site is visited by elk on their way to graze the neighbor's alfalfa field. How are we to tell what percentage of trailing is caused by cattle and what percentage is caused by wildlife? The answer to this evaluation question reveals only the biases of the researcher.			
16.	When I was a teenager in the 50's there were probably twice as many cows, sheep and horses on the range as there are now. The sage hens were plentiful around every water hole and spring on the desert and they hung around these places even though all of the other animals were there too. I think the reason they did this was while the animals stayed around water the predators stayed away.	OR	Both	rmc0046GB
17.	Livestock/Wildlife Grazing Policy Disconnect - The Sage Grouse Interim Management Strategy identifies a habitat priority to keep Sage Grouse from being listed. The sage step has many competing interests including livestock, deer, elk and wild horses that impact Sage Grouse habitat. BLM in conjunction with stockmen manage livestock. Utah Division of Wildlife Resources and the Wildlife Board manage big game. a process that currently is increasing elk numbers by approximately 20 percent. It would be unfair to reduce livestock grazing rights to address habitat concerns without including other competing interests, including elk, in the decision. The Fish & Wildlife Service's "Identified Threats to Greater Sage Grouse" did not include other competing wildlife interests on the sage step.	UT	Both	rmc0003GB
18.	There are many natural threats to grouse which seem to get very little attention. In our area, expansion of and destruction of sage brush by prairie dogs is a very real threat which could be greatly avoided by active control of prairie dogs. Another problem which probably can not be addressed is the predation by large raptors. We are seeing as increase in these, particularly eagles, which certainly have a bearing on Sage Grouse survival, as well as dissturbance at leks.	WY	Both	cfc0032RM
19.	Irrigation from reservoirs and dirt work systems that are in place on Federal lands should be allowed to continue. Sage grouse still need the grassy areas for food and shelter. The irrigation of the sparse grasslands ecosystems in the landscape will slow down the encroachment of the prairie dog and allow forage for more than one species survival in the area.	WY	Both	emc0050RM
20.	Prairie dogs are the largest destroyer of sage grouse habitat. The prairie dogs utilize the sagebrush year around and destroy the whole plant for visual protection from predators. The BLM and Forest Service must manage the prairie dogs away from the sage grouse areas to prevent the encroachment upon and destruction of core sage grouse habitat.	WY	Both	emc0050RM
21.	The Black-Tailed Prairie Dog Conservation Assessment and Management Strategy (BTPDCAS) plan in the Thunder Basin National Grassland calls for at a minimum of 18,000 and up to 52,000 acres of prairie dogs within an area called Category 1. There are several Category 2 areas proposed as well with the plan of maintaining 9000 acres of black tailed prairie dogs within the sum of those Category 2 areas. "Inside the Category 1 Area, prairie dogs will be allowed to expand their distribution and colonize new areas. Any prairie dog control efforts to address unwanted colonization onto non-federal lands within Category 1 Prairie Dog Habitat proposing to use rodenticide may only be initiated if cumulative acreage of active prairie dog colonies within Category 1 exceeds 18,000 acres. Use of rodenticide on federal lands may only be employed within ½ mile of the TBNG boundary and only in cases where appropriate and available non-lethal options have been tried and found ineffective for changing the rate and direction of colony expansion. The acreage in Category 1 is not capped at 18,000 acres, but would be allowed to grow within the boundary of the MA 3.63. ...Although the objective in the Category 1 area is to provide minimum of 18,000 acres of active colonies, the area is approximately 52,000 acres, this allows for prairie dogs to disperse and colonize into preferred habitats and provides more flexibility for prairie dogs to disperse and colonize new areas before they	WY	USFS	emc0050RM

Table C-7.D
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	spread outside of the designated boundary." (PAGE 45 of the BTPDCAS) "There is no single size of prairie dog colonies which is considered ideal for prairie dogs and their associated species".. Page 47- (BTPDCAS) (Underline and italics are mine to stress the importance of an issue) "In the Thunder Basin National Grassland each Category 2 Prairie Dog Habitat will contain a minimum of 1500 acres of active prairie dog colonies within a defined area. Combined, Category 2 prairie dog habitats should contain 9000 acres of active prairie dog colonies".. In the event that Category acreage exceeds 9000 acres control of colonies within Category 2 areas would be appropriate." (PAGE 46- BTPDCAS) The majority of the sage grouse core area in the Thunder Basin National Grassland is INSIDE of the proposed Cat. 1 and Category 2 Prairie Dog management areas. It would be an advantageous time to do a plan amendment on the sage grouse conservation and management and also to rewrite a plan amendment concerning the prairie dog management in the Thunder Basin National Grasslands. The Forest Service should redraw the Cat.1 and Cat.2 boundaries so the categorical areas do NOT include any more sage grouse habitat than possible and re-assess the need for so large an area for black tailed prairie dog colonization. This would alleviate many concerns over the increase of thousands of acres of prairie dogs within and next to core sage hen habitat in the same area.			
22.	It is well known that the prairie dogs will destroy the sage grouse habitat once the dogs are allowed to get densely populated. As referenced above: The prairie dog plan calls for NO management WITHIN the Category boundaries until a certain level of prairie dog population is acquired. This non-management will make the destruction of core sage grouse habitat UNAVOIDABLE within that specific categorical area. "Prairie dogs change both the amount and typed of vegetation found on their colonies (Agnew et a., 1986, Archer et al. 1987) .On the TBNG, the most common changes in vegetative condition is a shift from a mid-grass community dominated by western wheatgrass/blue grama or crested wheatgrass/blue grama to a community dominated by blue grama alone (Dan Svingen, pers. Obs) The percentage of bare ground typically increases with long-term prairie dog occupancy (ibid)." (PAGE 21 BTPDCAS)	WY	USFS	emc0050RM
23.	There are no present effective methods proven to prevent encroachment from large densities of prairie dogs on the Thunder Basin National Grassland other than the use of rodenticide. A plan amendment is required to change the Black tailed Prairie Dog Management and Conservation Strategy in addition to a plan amendment to support the conservation of the threatened Sage Grouse. It makes good sense to do both amendments together for a win-win situation. If the boundaries of the Cat. 1 and Cat. 2 areas were redrawn and rodenticide treatments were used both outside and within the NEW boundaries then there would be a much more effective method to keep the prairie dogs from encroaching upon the limited habitat of the sage grouse. It is imperative to remember in the Shirley Basin and other federally managed areas of land with prairie dogs that: A good management plan is essential to prevent the prairie dogs from encroaching upon nearby sage grouse habitat.	WY	USFS	emc0050RM
24.	There are a total of 553,000 acres in the TBNG. Potential sage-grouse habitat within the TBNG is estimated at about 438,500 acres. `The Thunder Basin analysis used vegetation classified from the USDA Forest Service Pueblo Integrated Resource Inventory (IRI) Center. Each type was classified for prairie dog suitability. This model classified 405,000 acres 92% of Thunder Basin as potentially suitable habitat for prairie dog colonization. '(PAGE 14-TBPDCAS) THIS IS A VERY IMPORTANT POINT: The black tailed prairie dog can adapt and live in a variety of landscapes while the sage grouse is limited to a narrower landscape. It does not make sense to purposely set the sage grouse up for destruction when the movement of a line boundary, use of rodenticide on federal lands and lower acres of prairie dog colonization would help prevent this from happening. These species cannot cohabitate the same area because the prairie dog will destroy the sage grouse habitat!	WY	USFS	emc0050RM

Table C-7.D
Comments Related to Terrestrial Wildlife

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
25.	In the particular case of the Casper area, overuse of sagebrush by big game and livestock is an important issue (BHSBLWG 2006:13).	WY	Both	emc0343GB

Table C-7.E
Comments Related to Special Status Wildlife

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	The special interest groups should look at how the sage grouse disappearance in certain areas can be very easily equated to forced introduction of such predators as wolves, mountain lions and bears.	All	Both	emc0148GB
2.	BLM Manual 6840 BLM Manual 6840 (December 2008) establishes extensive policies and guidelines directing how to manage "Special Status Species" which includes listed, proposed, and candidate species. BLM has a special designation for candidate species called "BLM Sensitive Species". Chapter 2 of BLM Manual 6840 is devoted to desclibing BLM management policies to protect Sensitive Species. The policies in Manual 6840 for candidate species have guided the development of sage-grouse mitigation plans like that for the Mount Hope Project. Before implementing the policies recommended in the NTT Report, BLM should evaluate the effectiveness of existing policies, including those in BLM Manual 6840. Many operators of projects on BLM-administered lands, including Eureka Moly, have made substantial investments in planning their projects to accommodate the Sensitive Species policies in BLM Manual 6840. These investments have reduced and/or mitigated impacts to Sensitive Species, and the policies in BLM Manual 6840 are effective regulatory tools that should be evaluated in the proposed EIS. BLM should not ignore or replace the existing regulatory tools it already has without demonsh'ating why the existing regulations are not functioning properly or are inadequate. The EIS documents should evaluate the directives in BLM Manual 6840 in the context of the No Action Alternative (see Section IV below) and discuss whether they are being fully and consistently implemented. BLM should not propose new or different regulatory mechanisms if any of the apparent shortcomings or gaps in the existing regulations are due mainly to uneven or incomplete implementation of existing policies. • Eureka Moly Scoping Issue No.2: Evaluate the effectiveness ofBLM Manual 6840, including a Gap Analysis - The EIS documents should assess whether the existing policies in Manual 6840 are adequate to provide protection to the greater sage-grouse. As part of this assessment, BLM should determine whether there are gaps that need to be filled, or improvements that need to be made, and whether the existing policies are being implemented in a complete and effective manner.	All	Both	emc0335GB
3.	Take a multi-species, landscape-level, ecosystem focused approach We encourage the agencies to consider using the sage-grouse conservation planning effort as a vehicle to meet their ancillary policy obligations and secure necessary conservation gains for other sagebrush ecosystem associated species of conservation concern. In order to achieve these conservation efficiencies, the BLM and FS should optimize expenditure of time and resources on sage-grouse conservation by: (1) conducting requisite analyses and developing conservation strategies on a landscape basis and (2) also analyzing the potential conservation co-benefits that could be conferred on other species such as pygmy rabbit and Brewer's sparrow by considering all species of concern associated with the sagebrush ecosystem as a part of the overall process of developing a conservation strategy for the sage-grouse. The associated environmental impact studies and analysis must ensure that individual Environmental Impact Statements prepared as a part of this overall strategy permit the public, state and federal agencies, and other stakeholders to understand the cumulative effects of management actions undertaken in accordance with this conservation strategy across the entire range of the sage-grouse. That is, when completed, these studies must provide a complete picture of how the alternative conservation strategies proposed under individual Environmental Impact Statements "add up to" a conservation strategy that will achieve the conservation objectives for the sage-grouse that are required to conserve the species. In addition, in each Environmental Impact Statement developed in accordance with this overall conservation strategy, we urge the BLM and FS to also analyze and consider alternatives that provide conservation benefits to other sagebrush steppe species of conservation concern. A targeted multispecies approach is more efficient than a narrow	All	Both	emc0339GB

Table C-7.E
Comments Related to Special Status Wildlife

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	single-species approach, it takes advantage of the opportunity at hand, and provides the federal land management agencies added ecosystem and species-scale conservation benefits from work already being done.			
4.	One multi-species approach would be to use anticipated conservation benefits to other species as a positively weighted factor in the development, comparative analysis, and selection of sage-grouse conservation alternatives and development of conservation measures and reserve design. For example, alternatives which consider, in addition to targeted sage-grouse conservation standards, broad, habitat-based conservation measures that confer conservation benefits to other species could be given additional consideration in decision making as providing broad conservation opportunities for the sage brush ecosystem, not just one species. An example that could inform a multispecies approach is the BLM's Threatened and Endangered Species Fund, which targets "low hanging fruit"projects where relatively cheap intervention can lead to downlisting and delisting of species. With only $2 million in its budget last year, the Fund worked toward delisting a dozen species. The decision making and targeting process that goes into management of the Fund could be used to determine affordable and easy ways to add on benefits that could be incorporated into this planning process moving forward.	All	Both	emc0339GB
5.	Take a multi-species, landscape-level, ecosystem focused approach We encourage the agencies to consider using the sage-grouse conservation planning effort as a vehicle to meet their ancillary policy obligations and secure necessary conservation gains for other sagebrush ecosystem associated species of conservation concern. In order to achieve these conservation efficiencies, the BLM and FS should optimize expenditure of time and resources on sage-grouse conservation by: (1) conducting requisite analyses and developing conservation strategies on a landscape basis and (2) also analyzing the potential conservation co-benefits that could be conferred on other species such as pygmy rabbit and Brewer's sparrow by considering all species of concern associated with the sagebrush ecosystem as a part of the overall process of developing a conservation strategy for the sage-grouse. The associated environmental impact studies and analysis must ensure that individual Environmental Impact Statements prepared as a part of this overall strategy permit the public, state and federal agencies, and other stakeholders to understand the cumulative effects of management actions undertaken in accordance with this conservation strategy across the entire range of the sage-grouse. That is, when completed, these studies must provide a complete picture of how the alternative conservation strategies proposed under individual Environmental Impact Statements "add up to" a conservation strategy that will achieve the conservation objectives for the sage-grouse that are required to conserve the species. In addition, in each Environmental Impact Statement developed in accordance with this overall conservation strategy, we urge the BLM and FS to also analyze and consider alternatives that provide conservation benefits to other sagebrush steppe species of conservation concern. A targeted multispecies approach is more efficient than a narrow single-species approach, it takes advantage of the opportunity at hand, and provides the federal land management agencies added ecosystem and species-scale conservation benefits from work already being done.	All	Both	emc0339GB
6.	One multi-species approach would be to use anticipated conservation benefits to other species as a positively weighted factor in the development, comparative analysis, and selection of sage-grouse conservation alternatives and development of conservation measures and reserve design. For example, alternatives which consider, in addition to targeted sage-grouse conservation standards, broad, habitat-based conservation measures that confer conservation benefits to other species could be given additional consideration in decision making as providing broad conservation opportunities for the sage brush ecosystem, not just one species. An example that could inform a multispecies approach is the BLM's Threatened and	All	Both	emc0339GB

Table C-7.E
Comments Related to Special Status Wildlife

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	Endangered Species Fund, which targets "low hanging fruit"projects where relatively cheap intervention can lead to downlisting and delisting of species. With only $2 million in its budget last year, the Fund worked toward delisting a dozen species. The decision making and targeting process that goes into management of the Fund could be used to determine affordable and easy ways to add on benefits that could be incorporated into this planning process moving forward.			
7.	The sage grouse is a good umbrella species, the protection of which would assist in the conservation of many other sagebrush obligate species that are currently declining (Rowland et al. 2006b). The plan amendments should therefore focus not just on sage grouse but on protecting the sagebrush ecosystem as a whole, at a landscape scale, which will also protect other BLM Sensitive Species such as the pygmy rabbit, white-tailed prairie dog, burrowing owl, ferruginous hawk, sage sparrow, sage thrasher, and Brewer's sparrow. We encourage BLM to approach the sage grouse plan amendment with an eye toward protecting large core segments of high-quality habitat and also to establish connectivity between core areas to lessen the likelihood of extirpation through permitting interchange of sage grouse between core areas.	All	Both	emc0343GB
8.	More than 350 species in sagebrush steppe (Wisdom et al. 2005a: 21 and App. 2)8—and as many as 630 species (Rich et al. 2005: 590, citing unpublished data)—are of conservation concern. Approximately 20 percent of native flora and fauna in the Sagebrush Sea are considered imperiled (CSEE 2002). Sixty species, subspecies, and Distinct Population Segments of vertebrate species that use sagebrush and/or other habitat types in sagebrush steppe that are designated as "endangered," "threatened" or candidate species under the ESA (see Appendix 2). Although sage-grouse are a useful umbrella species for the landscape, the planning process should account for specific habitat needs of other declining sagebrush dependent species, such as Brewer's sparrow, pygmy rabbit, Wyoming pocket gopher, and myriad fishes, amphibians, plants and mollusks. Wisdom et al. (2005b) categorized habitat types within sagebrush steppe in the Great Basin and identified groups of vertebrate species that primarily use those habitats. They recommend managing sub-habitats using these species as focal species (Wisdom et al. 2006b). Others propose using a suite of bird species that represent the full spectrum of nesting guilds (ground nesting, in shrub canopies, woodland canopies, and in cavities) and use a variety of habitat types as focal species for conservation planning in sagebrush steppe (CalPIF 2005). Planning for a suite of sagebrush species now could avoid land use conflicts with conservation in the future. Planners should consult a newly published reference, Sagebrush Ecosystem Conservation and Management: Ecoregional Assessment Tools and Models for the Wyoming Basins (Hanser et al. 2011), to plan for multiple species in the Wyoming Basin ecoregion.	All	Both	emc0391GB
9.	More than 350 species in sagebrush steppe (Wisdom et al. 2005a: 21 and App. 2)8—and as many as 630 species (Rich et al. 2005: 590, citing unpublished data)—are of conservation concern. Approximately 20 percent of native flora and fauna in the Sagebrush Sea are considered imperiled (CSEE 2002). Sixty species, subspecies, and Distinct Population Segments of vertebrate species that use sagebrush and/or other habitat types in sagebrush steppe that are designated as "endangered," "threatened" or candidate species under the ESA (see Appendix 2). Although sage-grouse are a useful umbrella species for the landscape, the planning process should account for specific habitat needs of other declining sagebrush dependent species, such as Brewer's sparrow, pygmy rabbit, Wyoming pocket gopher, and myriad fishes, amphibians, plants and mollusks. Wisdom et al. (2005b) categorized habitat types within sagebrush steppe in the Great Basin and identified groups of vertebrate species that primarily use those habitats. They recommend managing sub-habitats using these species as focal species (Wisdom et al. 2006b). Others propose using a suite of bird species that represent the full spectrum of nesting guilds (ground nesting, in shrub canopies,	All	Both	emc0391GB

Table C-7.E
Comments Related to Special Status Wildlife

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	woodland canopies, and in cavities) and use a variety of habitat types as focal species for conservation planning in sagebrush steppe (CalPIF 2005). Planning for a suite of sagebrush species now could avoid land use conflicts with conservation in the future. Planners should consult a newly published reference, Sagebrush Ecosystem Conservation and Management: Ecoregional Assessment Tools and Models for the Wyoming Basins (Hanser et al. 2011), to plan for multiple species in the Wyoming Basin ecoregion.			
10.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: ACECs can be designated for habitat, but also for historic, cultural and scenic values. BLM should prioritize ACEC designation for lands that contain priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. This approach will allow BLM to ensure that ACECs maximize protection of multiple sensitive resource values benefiting a range of user groups.	CO	BLM	emc0070RM
11.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: ACECs can be designated for habitat, but also for historic, cultural and scenic values. BLM should prioritize ACEC designation for lands that contain priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. This approach will allow BLM to ensure that ACECs maximize protection of multiple sensitive resource values benefiting a range of user groups.	East	Both	emc0089RM
12.	Nye County has worked successfully with the US Fish & Wildlife Service, Nevada Division of Wildlife, Nevada Natural Heritage Program, BLM, and others to protect and enhance the habitat of the Amargosa Toad in Oasis Valley, Nevada and prevent its listing as a threatened or endangered species. This practical, science-based effort should be used as a model for efforts to protect the Sage Grouse, without the additional costs associated with the implementation of the IM. A copy of the conservation agreement is attached to these comments, and the listing decision announcement can be found at: http://www.biologicaldiversity.org/news/press_releases/2010/amargosa-toad-07-19-2010.html.	NVCA	Both	emc0147GB
13.	It may also be helpful to the public to describe a case study of the August 29, 1980 listing of the Desert Tortoise, another landscape-scale species like the Sage Grouse, as threatened in the Mojave Desert and Case study and what happened. As I understand the process, BLM land use plans were amended to include the Desert Tortoise recovery plan requirements. Large ACECs were designated with the intent of protecting as much intact Desert Tortoise habitat as possible. Grazing allotments were closed and off-road vehicle use areas were limited. A $250/acre impact fee was charged and used to implement a Multi-Species Habitat Conservation Plan. What are the results of the land use plan Desert Tortoise conservation strategy in Nevada and elsewhere in the Desert Tortoise range? Have populations or trends increased or decreased? Has priority or critical Desert Tortoise habitat increased or decreased? Have habitat rehabilitation or restoration projects been successful or not? How much public funds have been spent on protecting Desert Tortoises or priority habitat on public lands? What monitoring of populations and habitats has been required? How much required monitoring has been implemented, annually and since 1980? We understand the Desert Tortoise experts are considering requesting Desert Tortoise status be raised from threatened to endangered because of failures to conserve large areas of habitat. Only 4 areas of over 1,000 square miles of intact functioning habitat were designated and appear insufficient to stop fragmentation and blocking of genetic linkages.	NVCA	Both	emc0283GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	There is no mention of impacts and competition from elks, antelope, deer and other wildlife on vegetation and vegetative cover.	All	Both	cfc0006RM
2.	There is little emphasis on treating and restoring range-land to bring it back to its full productive potential for sage grouse and all wildlife and livestock. There should be no retirement of Grazing Priveleges to achieve this.	All	Both	cfc0006RM
3.	To prevent listing of Sage-grouse livestock grazing and vegetative management projects and programs must be modified to provide sufficient quality Sage-grouse habitat.	All	Both	cfc0016
4.	If grazing privileges are retired, how will the agencies manage the health of the rangeland? It is common knowledge that semi-arid environments need grazing to keep the plants healthy. This is essential for the sage grouse that depend of these plants.	All	Both	cfc0024RM
5.	Cattle graze grasses exposing forbs, which also are important for sage grouse survival.	All	Both	cfc0030
6.	Since Ogden trekked through, vegetation in the Great Basin has changed . Flood irrigated meadows and ground watered alfalfa transformed lands in private ownership while others in the public domain have changed from sage to grasslands. This has been the results of both fire and mechanical treatment.	All	Both	cfc0030GB
7.	Crested wheat seedings, which were established on treated and burned over range lands, are returning , in part, to sage brush, an important food source and cover for sage grouse.	All	Both	cfc0030GB
8.	Interpretation of old growth juniper needs to be reassessed - NRCS-SG funded projects need to be able to cut ALL trees in areas with over 2 million acres of juniper in the Modoc NF. It won't hurt to cut ALL the trees in the NCRS project areas.	All	Both	cfc0032GB
9.	I believe that cutting a lot of the juniper trees in certain areas and replacing them with sagebrush will help the sage-grouse and the mule deer both.	All	Both	cfc0039GB
10.	I am in process with NRCS SGI plan which includes fencing, pasture management, deferrment of pastures for greater stubble height. Reseeding pastures and rangeland with SG I grasses for better habitat. Doing Absolute best to grow the bird, but very frustrated.	All	Both	cfc0053GB
11.	Forage and cover are needed and larger buffer zones around leks and breeding grounds, at least 3 miles, should be the policy.	All	Both	emc0012RM
12.	I'd like to comment on the sage grouse strategy. I understand that during the 60's there were a great number of sage grouse in southwest montana. During this time period there was an active predator control going on. Sheep were being grazed in largenumbers. Also at this time, eagles, facons, hawks and the like were not protected and the no.s were down due to DDT. Cattle grazing was having a greater impact on the vegetation. Also in the 60's, large areas were sprayed to kill sagebrush and make more grass. I have dates of spraying but can't find dates and data of sage no.s for that time frame or after. I would like to see a comparison of no. of sage grouse before, during and after spraying to see if reduction in sagebrush had an effect on sage grouse no.s. Since then, grazing by sheep and cattle has been reduced. Making better riparian and vegetation overall. Some burning of sagebrush was done in the 80's but since that time, sagebrush treatment has been reduce greatly. So no change in sagebrush quality! Predator control has been reduced and the eagles, falcons, hawks, etc have been protected and increased.	All	Both	emc0013GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
13.	The relationships between the plant and insect communities are understudied. What insects do grouse eat? What plants to those insects eat? What insects pollinate those plants? What insects benefit big sage brush? What do they eat? What insects harm big sage brush?	All	Both	emc0013RM
14.	Pocket gophers churn the soil, providing greater moisture capture which leads to thicker plant growth. Pocket gophers seem to be spreading. How will this impact the sage grouse?	All	Both	emc0013RM
15.	I would think that juniper encroachment alone may be significant, as it has provided perches-nesting areas- cover for hawks, eagles and other predators for the last 80 years.	All	Both	emc0017
16.	Historically, sagegrouse numbers were greater in this area during and after a period of extreme overgrazing. At that time, the federal government actively poisoned and paid bounties for furred predators. Winged predators were shot by homesteaders to protect their chickens. Sagegrouse took advantage of lower predation as did jackrabbits. In 1926, the Opheim paper published jackrabbit poisoning advice. In 1936, 12,500 rabbits were reported killed near Opheim	All	Both	emc0028RM
17.	Curiously, grass may be a limiting factor to the sage grouse numbers. Sagebrush habitat is the ecological home of the greater sage grouse. So it is interesting to note, lands with an abundance of grass tend to have less sagebrush. Plus, grass encourages large wild land fires which are devastating to sage grouse habitat. We have read stories and seen pictures oflarge numbers of sage grouse in the early 1900's. Then, large numbers of livestock also grazed these federal lands. Grass was not in abundance then, as it is now. So, why have sage grouse numbers declined? The axiom--more cows = more sage grouse--less cows = less sage grouse; may have merit.	All	Both	emc0029GB
18.	Third pinon and juniper encroachment, sage dose not grow well under These tree.	All	Both	emc0031GB
19.	Sage-grouse habitat management directives prescribe conservation and restoration of high quality sagebrush plant communities suitable for the life cycle of the sage-grouse. Invasive pinion/juniper and cheatgrass in many areas have replaced the sagebrush ecosystem. Activities related to minerals exploration have potential to restore the sagebrush plant community.	All	Both	emc0042GB
20.	Under 43 CFR 3809, earth-disturbing activities by exploration and mining companies must be reclaimed as near as possible to pre-existing landform and plant communities. Reclamation permits in areas of invasive pinion/juniper and cheatgrass do or can require reseeding with seed mixes appropriate for sage-grouse habitat. To the extent that earthdisturbing activities occur in pinion/juniper- and cheatgrass-invaded areas, reclamation can only improve habitat for sage-grouse.	All	Both	emc0042GB
21.	Activities responsible for the loss or degradation of sagebrush habitats also may be used to restore these habitats. These activities include prescribed fire, grazing, herbicides, and mechanical treatments. Decisions on land treatments using these tools should be based on quantitative knowledge of vegetative conditions over an entire population's seasonal range. Generally, the treatment selected should be that which is least disruptive to the vegetation community and has the most rapid recovery time. This selection should not be based solely on economic cost.	All	Both	emc0057GB
22.	Manage breeding habitats to support 15-25% canopy cover of sagebrush, perennial herbaceous cover averaging >18 cm in height with (7 inches) >15% canopy cover for grasses and >10% for forbs and a diversity of forbs Habitats meeting these conditions should have a high priority for wildfire suppression and should not be considered for sagebrush control programs.	All	Both	emc0057GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
23.	Sagebrush and herbaceous cover should provide overhead and lateral concealment from predators. If average sagebrush height is >75 cm (29 inches), herbaceous cover may need to be substantially greater than 18 cm to provide this protection. There is much variability among sagebrush-dominated habitats and some Wyoming sagebrush and low sagebrush breeding habitats may not support 25% herbaceous cover. In these areas, total herbaceous cover should be >15 % . Further, the herbaceous height requirement may not be possible in habitats dominated by grasses that are relatively short when mature. In all of these cases, local biologists and range ecologists should develop height and cover requirements that are reasonable and ecologically defensible. Leks tend to be relatively open, thus cover on leks should not meet these requirements.	All	Both	emc0057GB
24.	The Report identifies several potential impacts to sage-grouse from grazing; however, the discussion, fails to put into perspective that many of these impacts are not just livestock related. Plant communities change over time, with or without grazing, and when the plant communities are not managed concomitantly with grazing, the changes discussed in the Report can occur. BLM and the FS have the responsibility for managing vegetation on public lands, and vegetation management based on the ESDs, and State and Transition Models (STMs) for each ESD should be implemented as part of any conservation measures. Without appropriate vegetation management, the ability of the ecological sites to support sage-grouse populations will not be maintained.	All	Both	emc0084GB
25.	Kane County definitively supports the improvement and restoration of sage grouse habitats and in the majority of circumstances proposes that by utilizing aggressive and enlightened vegetative management programs including juniper removal will greatly help in perpetuating sage grouse across its full range. Passive management of sage grouse habitats is not an option - if the BLM and Forest Service are serious about conserving the sage grouse and its associated habitats.	All	Both	emc0106GB
26.	The two most serious threats to sage grouse and its environs are over mature sagebrush and the juniper invasion caused by aggressive fire suppression and timidity in the face of each agencies not carrying out their responsibilities in work performance including conducting adequate, timely and comprehensive NEPA analysis for habitat restoration and vegetative management.	All	Both	emc0106GB
27.	There already exists a large body of research and knowledge about western lands and the full range of habits and the associated wildlife species in residence in these environs. One key factor in the conservation of all of our public land based plant and animal species is the science of vegetative structures stages and the life cycles that each stage of plant growth undergoes. Interestingly we already know about this from planting, growing and harvesting our gardens in and around our homes. Each new plant and group of plants requires some form of disturbance in order to perpetuate and establish each new cycle of diverse plants and associated functions. We simply can't park our gardens very long before they need renewal and restoration. Sage grouse also require healthily function habitats with a variety of plants, ages and conditions in which to forage, shelter and raise their young.	All	Both	emc0106GB
28.	We would submit to you that in seeking scoping comments about sage grouse that you adequately consider in your anticipated conservation measures - guidance that is very critical when considering vegetative structural stages and that these measures must be included in any final conservation program.	All	Both	emc0106GB
29.	Vegetation and Wildfire Suppression and Management We agree with the proposed vegetation management plans contained in BLM Instruction Memorandum No. 2012-043 (IM).	All	Both	emc0108GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
30.	Rights-of-Way (ROW) The ROW recommendations proposed in the IM may create significant delays in permitting renewable energy projects. To recycle pending Right of Way (ROW) applications for additional alternatives analysis could add months or even years to the development of renewable energy projects. Also, the IM gives Field Offices the ability to defer processing ROW applications until the completion of the LUP process, which has the potential to stall development for up to three years.	All	Both	emc0108GB
31.	We do not agree with the use of introduced grass or forb seeds under any circumstances. If native seed is not available, the disturbance or re-vegetation should not proceed until native seed is available (pg. 17);	All	Both	emc0109GB
32.	Do not implement vegetation manipulations (e.g. Lawson aerator) unless clear objectives, rigorous monitoring, and intended results have high likelihood of success.	All	Both	emc0109GB
33.	Do not implement vegetation manipulations (e.g. Lawson aerator) unless clear objectives, rigorous monitoring, and intended results have high likelihood of success.	All	Both	emc0109GB
34.	Page 28 of the NTT Report states: "In fire prone areas where sagebrush seed is required for sage-grouse habitat restoration, consider establishing seed harvest areas that are managed for seed production (Armstrong 2007) and are a priority for protection from outside disturbances." In the 1980s there was a Bureau-wide effort to identify native plant seed reserves on public lands, including for lower-elevation sagebrush. From a historical perspective, it would be useful in the EISs to present their current status, how successful their protection from outside disturbances (including fire) has been, and the degree to which they have actually been used for procuring seed.	All	Both	emc0113GB
35.	Stringent reclamation standards are in place for re-establishing rangeland and wildlife habitat on the postmining landscape. The coal mining industry has been progressive in developing reclamation techniques (Best Technology Currently Available - BTCA) for successful vegetation re-establishment. The increased availability of native plant materials in both kind and quantity has aided in this success. Sage-grouse use of reclaimed plant communities providing summer foraging and brood-rearing habitat has been documented at one of PPRO's mining operations.	All	Both	emc0122RM
36.	The County is extremely supportive of active "integrated vegetation management" that maintain critical ecological processes. Focus should not be on trying to achieve the "reference state condition" that is extremely difficult, rather it should be maintaining the ecological processes of the reference state in order to prevent crossing thresholds such as establishment and dominance of invasive species. We are supportive of maintaining all possible tools (grazing, native and non-native plant species, etc.) to achieve these sorts of projects. These sorts of projects should include a robust monitoring component and be adaptive.	All	Both	emc0130GB
37.	Over the years, the BLM has made great progress in improving vegetation composition, quality and ground cover. Range conditions have improved from poor/fair to good/excellent. When I first worked for the BLM in Wyoming and Montana, large numbers of sage-grouse were available and observed. As we improved range conditions, sage-grouse numbers diminished. A question that needs to be addressed "have improved range conditions adversely affected sage grouse populations"?	All	Both	emc0135GB
38.	Because BLM's underlying goal is to conserve greater sage-grouse and because time is of the essence, we suggest that predation and predation management receive consideration in the NEPA process. BLM and its cooperating agency partners may provide a more comprehensive analysis and enhance the potential for sage-grouse conservation success by addressing	All	Both	emc0138GB

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	these issues and questions when developing the environmental analyses: 1. Where and how has predation contributed to the decline of greater sage-grouse in the existing environment? How have habitat management and resource development practices encouraged predation? What land use changes can alter habitats to deter or enhance predation? 2. What role would direct predation management play in a reasonable range of alternatives? Could BLM or its partners select these options to enhance project success? 3. What predation management research needs are being addressed? How effective has predation management been thus far? 4. How might predation management enhance the overall success of the proposed actions and alternatives to help BLM and its cooperating agencies achieve the goal of greater sagegrouse conservation and avoidance of an ESA listing?			
39.	Regarding adequate residual plant cover, the regulations should reiterate that ecosystems, occupied habitat and greater sage-grouse populations vary and should not be managed by a "one-size-fits-all" approach, but rather by an approach that allows land managers, local working groups and grazing permittees to collaborate on management practices that benefit the resources affecting individual populations in small areas—not over the entire Western greater sage-grouse range. Structure objectives that are consistent with the multiple needs should then be developed. The above-mentioned decision makers should determine appropriate levels of grazing and grazing systems that will contribute to greater sage-grouse habitat in any given area. To develop habitat objectives for nesting habitat areas, they should consider factors such as the greater sage-grouse guidelines, present vegetation, site potential based on the ecological site description and other relevant factors, such as legally authorized land uses and the habitat needs of other species. It must be recognized that factors including snow load, rain, wind and other grazers (including insects) significantly impact residual plant cover, especially for the subsequent spring measurements. If residual plant cover is to be measured, all factors must be taken into consideration.	All	Both	emc0140RM
40.	BLM is unclear on its habitat maps when identifying grassland, sage brush steppe and semi desert areas. On reviewing the maps, there are known areas that are large grasslands that are being identified as a sage brush steppe or a semi desert. BLM needs to identify the criteria used when making the break between grassland and a sage brush steppe in mapping units.	All	Both	emc0140RM
41.	In conclusion the key to restoring Sage Grouse populations is early and full suppression of fires, restoration of the burnt area with native shrubs and grasses, and controlling predators like coyotes, foxes and wolves.	All	Both	emc0145GB
42.	I believe you need to have one alternative address what happens if you only produce primarily grasslands in the future, due to fire occurrence and shrubs not surviving. You need to evaluate how frequent fire occurrence may mean you are not going to be successful in building shrub lands even through active intervention?	All	Both	emc0149GB
43.	It is admirable to try to use native plants as you have over time. We all know there are limitations in cost and availability to use native plants. You need to be realistic in the use native plants, availability over the life of this effort and the capability to use other species. I have seen decisions to do nothing if native plants were not available. That can be an alternative in this decision making process, but the use of native plants needs to be addressed here. An alternative needs to address this issue.	All	Both	emc0149GB
44.	Objectives, methodologies and terminology used in conducting inventories and monitoring varies within and among agencies and evolved over time (Natural Resources Council 1994; Wombolt et. al, 2002).). The original mandates for inventory of USDA Forest Service, and later USDI Bureau of Land Management, lands emphasized measurements of carrying capacity for livestock, as did early national surveys of federal rangelands (Box 1990, Rowley 1985). The USDA Forest Service currently uses a line intercept technique that over-estimates sagebrush canopy cover by including openings	All	Both	emc0159GB

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	in crowns of individual shrubs as crown cover (U.S. Department of Agriculture 1993). This leads to issues about data quality compared to methods using more precise techniques considered appropriate for research. USDA Soil Conservation Service inventories were designed to measure soil erosion and the status of natural resources to aid in ranch management. Inventory systems developed by these agencies were based upon the succession status of the observed plant community relative to the historic climax plant community (Dyksterhuis 1949) or to a desired plant community. The systems differed in their classification of sites, evaluation of site status or condition, estimation of site potentials, determination of trend or the direction of change in vegetation (Wombolt et. al, 2002).			
45.	Maintenance of healthy sagebrush-dominated communities and landscapes centers upon management to protect or improve their physical and biotic resources and functions. To apply management to the landscape at the right time and in the right places requires efforts to not only protect sage grouse, but consideration of the other species using the same habitats. A balanced approach is needed to find the scale and time frame that will be required to sustain the rangelands and habitat based on current understanding. Careful interpretation of inventory and monitoring methods are needed to measure the quantity and quality of habitat followed with appropriate management techniques that will maintain or improve the habitat (Wombolt 2002).	All	Both	emc0159GB
46.	Forbs are also a critical source of food for young chicks. During spring, important forb species include common dandelion (Taraxacum officinale), yellow salsify (Tragpopogon dubius), prairie pepperweed (Lepidium desiflorum), clover (Trifolium spp.), knotweed (Polygonum spp.), alfalfa (Medicago sativa), yarrow (Achillea spp.), sweet clover (Melilotus spp.), vetch (Vicia spp.), milk vetch (Astragulus spp.), and prickly lettuce (Lactuca serriola) (Schroeder et al. 1999).	All	Both	emc0159GB
47.	Predation needs to be considered as a reasonable factor on the impact to sage grouse populations in the EIS. Based on observations by numerous local ranchers, the impact is a critical factor to consider. Where studies are lacking, the EIS should take into account what is available and give serious weight to the ODFW plan that states a rigorous data collection is needed in the sampling schemes for lek counts. The same is true for many areas of the sage grouse habitat and other wildlife issues. Discussing science is not the same as doing science. The basic principles of doing science requires a good study design, rigorous data collection, and analysis. - Population ecology - Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some level of rigor to the data collection. (Oregon Dept. Fish and Wildlife, April 2011. Greater Sage--Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat). - Survival of sage-grouse is typically high with more than approximately 60% of a cohort surviving from year to year. - Of the 40% of a grouse population that succumbs to mortality during a year predation accounts for approximately 85% of reported non-hunting mortalities and 79% of nest failures (Bergerud 1988). - Specifically, predation on nests and young chicks can be high and affect populations (Gregg et al. 1994, Aldridge and Brigham 2001, Schroeder and Baydack 2001, Coates 2007). However, few studies have indicated that predation is a major limiting factor to sage grouse. - In Idaho, predation was the most common cause of death for radio-marked sage- grouse (83% of males and 52% of females) in a hunted population (Connelly et al. 2000a) where apparent survival was 71 and 68% for male and female sage- grouse, respectively. Coyotes (Canis latrans), badgers, (Taxidea taxus), bobcats (Felis rufus), and several species of raptors are common predators of	All	Both	emc0159GB

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	juvenile and adult sage-grouse throughout most of sage-grouse range (Hagen 2011). Additionally, coyotes, badgers, common ravens (Corvus corax), and blackbilled magpies (Pica pica) commonly prey on sage-grouse eggs (Hagen 2011).			
48.	Thousands of acres of decadent sage brush exist throughout BLM lands. Wildlife biologists claim that sage brush is needed by obligate species and wintering wildlife. I believe this to be true, but not to the extent and degree that sage brush exists today.	All	Both	emc0165GB
49.	Objectives, methodologies and terminology used in conducting inventories and monitoring varies within and among agencies and evolved over time (Natural Resources Council 1994; Wombolt et. al, 2002).). The original mandates for inventory of USDA Forest Service, and later USDI Bureau of Land Management, lands emphasized measurements of carrying capacity for livestock, as did early national surveys of federal rangelands (Box 1990, Rowley 1985). The USDA Forest Service currently uses a line intercept technique that over-estimates sagebrush canopy cover by including openings in crowns of individual shrubs as crown cover (U.S. Department of Agriculture 1993). This leads to issues about data quality compared to methods using more precise techniques considered appropriate for research. USDA Soil Conservation Service inventories were designed to measure soil erosion and the status of natural resources to aid in ranch management. Inventory systems developed by these agencies were based upon the succession status of the observed plant community relative to the historic climax plant community (Dyksterhuis 1949) or to a desired plant community. The systems differed in their classification of sites, evaluation of site status or condition, estimation of site potentials, determination of trend or the direction of change in vegetation (Wombolt et. al, 2002).	All	Both	emc0179GB
50.	Maintenance of healthy sagebrush-dominated communities and landscapes centers upon management to protect or improve their physical and biotic resources and functions. To apply management to the landscape at the right time and in the right places requires efforts to not only protect sage grouse, but consideration of the other species using the same habitats. A balanced approach is needed to find the scale and time frame that will be required to sustain the rangelands and habitat based on current understanding. Careful interpretation of inventory and monitoring methods are needed to measure the quantity and quality of habitat followed with appropriate management techniques that will maintain or improve the habitat (Wombolt 2002).	All	Both	emc0179GB
51.	Forbs are also a critical source of food for young chicks. During spring, important forb species include common dandelion (Taraxacum officinale), yellow salsify (Tragpopogon dubius), prairie pepperweed (Lepidium desiflorum), clover (Trifolium spp.), knotweed (Polygonum spp.), alfalfa (Medicago sativa), yarrow (Achillea spp.), sweet clover (Melilotus spp.), vetch (Vicia spp.), milk vetch (Astragulus spp.), and prickly lettuce (Lactuca serriola) (Schroeder et al. 1999).	All	Both	emc0179GB
52.	Predation needs to be considered as a reasonable factor on the impact to sage grouse populations in the EIS. Based on observations by numerous local ranchers, the impact is a critical factor to consider. Where studies are lacking, the EIS should take into account what is available and give serious weight to the ODFW plan that states a rigorous data collection is needed in the sampling schemes for lek counts. The same is true for many areas of the sage grouse habitat and other wildlife issues. Discussing science is not the same as doing science. The basic principles of doing science requires a good study design, rigorous data collection, and analysis. - Population ecology - Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some	All	Both	emc0179GB

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	level of rigor to the data collection. (Oregon Dept. Fish and Wildlife, April 2011. Greater Sage--Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat). - Survival of sage-grouse is typically high with more than approximately 60% of a cohort surviving from year to year. - Of the 40% of a grouse population that succumbs to mortality during a year predation accounts for approximately 85% of reported non-hunting mortalities and 79% of nest failures (Bergerud 1988). - Specifically, predation on nests and young chicks can be high and affect populations (Gregg et al. 1994, Aldridge and Brigham 2001, Schroeder and Baydack 2001, Coates 2007). However, few studies have indicated that predation is a major limiting factor to sage grouse. - In Idaho, predation was the most common cause of death for radio-marked sage- grouse (83% of males and 52% of females) in a hunted population (Connelly et al. 2000a) where apparent survival was 71 and 68% for male and female sage- grouse, respectively. Coyotes (Canis latrans), badgers, (Taxidea taxus), bobcats (Felis rufus), and several species of raptors are common predators of juvenile and adult sage-grouse throughout most of sage-grouse range (Hagen 2011). Additionally, coyotes, badgers, common ravens (Corvus corax), and blackbilled magpies (Pica pica) commonly prey on sage-grouse eggs (Hagen 2011).			
53.	Objectives, methodologies and terminology used in conducting inventories and monitoring varies within and among agencies and evolved over time (Natural Resources Council 1994; Wombolt et. al, 2002).). The original mandates for inventory of USDA Forest Service, and later USDI Bureau of Land Management, lands emphasized measurements of carrying capacity for livestock, as did early national surveys of federal rangelands (Box 1990, Rowley 1985). The USDA Forest Service currently uses a line intercept technique that over-estimates sagebrush canopy cover by including openings in crowns of individual shrubs as crown cover (U.S. Department of Agriculture 1993). This leads to issues about data quality compared to methods using more precise techniques considered appropriate for research. USDA Soil Conservation Service inventories were designed to measure soil erosion and the status of natural resources to aid in ranch management. Inventory systems developed by these agencies were based upon the succession status of the observed plant community relative to the historic climax plant community (Dyksterhuis 1949) or to a desired plant community. The systems differed in their classification of sites, evaluation of site status or condition, estimation of site potentials, determination of trend or the direction of change in vegetation (Wombolt et. al, 2002).	All	Both	emc0179GB
54.	Maintenance of healthy sagebrush-dominated communities and landscapes centers upon management to protect or improve their physical and biotic resources and functions. To apply management to the landscape at the right time and in the right places requires efforts to not only protect sage grouse, but consideration of the other species using the same habitats. A balanced approach is needed to find the scale and time frame that will be required to sustain the rangelands and habitat based on current understanding. Careful interpretation of inventory and monitoring methods are needed to measure the quantity and quality of habitat followed with appropriate management techniques that will maintain or improve the habitat (Wombolt 2002).	All	Both	emc0179GB
55.	Forbs are also a critical source of food for young chicks. During spring, important forb species include common dandelion (Taraxacum officinale), yellow salsify (Tragpopogon dubius), prairie pepperweed (Lepidium desiflorum), clover (Trifolium spp.), knotweed (Polygonum spp.), alfalfa (Medicago sativa), yarrow (Achillea spp.), sweet clover (Melilotus spp.), vetch (Vicia spp.), milk vetch (Astragulus spp.), and prickly lettuce (Lactuca serriola) (Schroeder et al. 1999).	All	Both	emc0179GB
56.	Management of habitat for the greater sage-grouse occurs on a complex sagebrush dominated landscape with tremendous	All	Both	emc0204GB

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	variability locally and range wide. It is ecologically impossible to regulate for improved sage-grouse performance with species specific regulatory measures. Local citizens working together to resolve local and site specific issues offers the best chance for success. Considerable work has already been accomplished at the local level in planning for improved vegetative management. To date the agencies have failed to implement the majority of these planning efforts. Agencies should prioritize and implement these measures before increasing regulatory control that often paralyzes needed action.			
57.	I am a livestock producer based in the state of Nevada. Livestock grazing is a legal and valid use of public rangelands and is a vital component of my livelihood. The extensive encroachment of pinyon-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much of the West. The proposed range-wide guidelines do not recognize the variability of issues across the west and do not focus on or prioritize specific issues at the needed scale.	All	Both	emc0204GB
58.	Objectives, methodologies and terminology used in conducting inventories and monitoring varies within and among agencies and evolved over time (Natural Resources Council 1994; Wombolt et. al, 2002).). The original mandates for inventory of USDA Forest Service, and later USDI Bureau of Land Management, lands emphasized measurements of carrying capacity for livestock, as did early national surveys of federal rangelands (Box 1990, Rowley 1985). The USDA Forest Service currently uses a line intercept technique that over-estimates sagebrush canopy cover by including openings in crowns of individual shrubs as crown cover (U.S. Department of Agriculture 1993). This leads to issues about data quality compared to methods using more precise techniques considered appropriate for research. USDA Soil Conservation Service inventories were designed to measure soil erosion and the status of natural resources to aid in ranch management. Inventory systems developed by these agencies were based upon the succession status of the observed plant community relative to the historic climax plant community (Dyksterhuis 1949) or to a desired plant community. The systems differed in their classification of sites, evaluation of site status or condition, estimation of site potentials, determination of trend or the direction of change in vegetation (Wombolt et. al, 2002).	All	Both	emc0209GB
59.	Maintenance of healthy sagebrush-dominated communities and landscapes centers upon management to protect or improve their physical and biotic resources and functions. To apply management to the landscape at the right time and in the right places requires efforts to not only protect sage grouse, but consideration of the other species using the same habitats. A balanced approach is needed to find the scale and time frame that will be required to sustain the rangelands and habitat based on current understanding. Careful interpretation of inventory and monitoring methods are needed to measure the quantity and quality of habitat followed with appropriate management techniques that will maintain or improve the habitat (Wombolt 2002).	All	Both	emc0209GB
60.	Forbs are also a critical source of food for young chicks. During spring, important forb species include common dandelion (Taraxacum officinale), yellow salsify (Tragpopogon dubius), prairie pepperweed (Lepidium desiflorum), clover (Trifolium spp.), knotweed (Polygonum spp.), alfalfa (Medicago sativa), yarrow (Achillea spp.), sweet clover (Melilotus spp.), vetch (Vicia spp.), milk vetch (Astragulus spp.), and prickly lettuce (Lactuca serriola) (Schroeder et al. 1999).	All	Both	emc0209GB
61.	Predation needs to be considered as a reasonable factor on the impact to sage grouse populations in the EIS. Based on observations by numerous local ranchers, the impact is a critical factor to consider. Where studies are lacking, the EIS	All	Both	emc0209GB

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	should take into account what is available and give serious weight to the ODFW plan that states a rigorous data collection is needed in the sampling schemes for lek counts. The same is true for many areas of the sage grouse habitat and other wildlife issues. Discussing science is not the same as doing science. The basic principles of doing science requires a good study design, rigorous data collection, and analysis. - Population ecology - Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some level of rigor to the data collection. (Oregon Dept. Fish and Wildlife, April 2011. Greater Sage--Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat). - Survival of sage-grouse is typically high with more than approximately 60% of a cohort surviving from year to year. - Of the 40% of a grouse population that succumbs to mortality during a year predation accounts for approximately 85% of reported non-hunting mortalities and 79% of nest failures (Bergerud 1988). - Specifically, predation on nests and young chicks can be high and affect populations (Gregg et al. 1994, Aldridge and Brigham 2001, Schroeder and Baydack 2001, Coates 2007). However, few studies have indicated that predation is a major limiting factor to sage grouse. - In Idaho, predation was the most common cause of death for radio-marked sage- grouse (83% of males and 52% of females) in a hunted population (Connelly et al. 2000a) where apparent survival was 71 and 68% for male and female sage- grouse, respectively. Coyotes (Canis latrans), badgers, (Taxidea taxus), bobcats (Felis rufus), and several species of raptors are common predators of juvenile and adult sage-grouse throughout most of sage-grouse range (Hagen 2011). Additionally, coyotes, badgers, common ravens (Corvus corax), and blackbilled magpies (Pica pica) commonly prey on sage-grouse eggs (Hagen 2011).			
62.	Another thing that needs to happen is stop pasturising of the burn areas with crested wheat and grasses just for cattle grazing. All burn areas have to be returned to the native grasses that were there in the beginning especially sagebrush. Crested wheat should be classified as a noxious weed and get rid of it.	All	Both	emc0211GB
63.	We encourage BLM to recognize and address the following in the EIS and in plan revisions: 1. The importance of addressing existing threats from wildfire and invasive species encroachment, particularly juniper encroachment.	All	BLM	emc0212GB
64.	Objectives, methodologies and terminology used in conducting inventories and monitoring varies within and among agencies and evolved over time (Natural Resources Council 1994; Wombolt et. al, 2002).). The original mandates for inventory of USDA Forest Service, and later USDI Bureau of Land Management, lands emphasized measurements of carrying capacity for livestock, as did early national surveys of federal rangelands (Box 1990, Rowley 1985). The USDA Forest Service currently uses a line intercept technique that over-estimates sagebrush canopy cover by including openings in crowns of individual shrubs as crown cover (U.S. Department of Agriculture 1993). This leads to issues about data quality compared to methods using more precise techniques considered appropriate for research. USDA Soil Conservation Service inventories were designed to measure soil erosion and the status of natural resources to aid in ranch management. Inventory systems developed by these agencies were based upon the succession status of the observed plant community relative to the historic climax plant community (Dyksterhuis 1949) or to a desired plant community. The systems differed in their classification of sites, evaluation of site status or condition, estimation of site potentials, determination of trend or the direction of change in vegetation (Wombolt et. al, 2002).	All	Both	emc0222GB
65.	Maintenance of healthy sagebrush-dominated communities and landscapes centers upon management to protect or	All	Both	emc0222GB

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	improve their physical and biotic resources and functions. To apply management to the landscape at the right time and in the right places requires efforts to not only protect sage grouse, but consideration of the other species using the same habitats. A balanced approach is needed to find the scale and time frame that will be required to sustain the rangelands and habitat based on current understanding. Careful interpretation of inventory and monitoring methods are needed to measure the quantity and quality of habitat followed with appropriate management techniques that will maintain or improve the habitat (Wombolt 2002).			
66.	Forbs are also a critical source of food for young chicks. During spring, important forb species include common dandelion (Taraxacum officinale), yellow salsify (Tragpopogon dubius), prairie pepperweed (Lepidium desiflorum), clover (Trifolium spp.), knotweed (Polygonum spp.), alfalfa (Medicago sativa), yarrow (Achillea spp.), sweet clover (Melilotus spp.), vetch (Vicia spp.), milk vetch (Astragulus spp.), and prickly lettuce (Lactuca serriola) (Schroeder et al. 1999).	All	Both	emc0222GB
67.	Predation needs to be considered as a reasonable factor on the impact to sage grouse populations in the EIS. Based on observations by numerous local ranchers, the impact is a critical factor to consider. Where studies are lacking, the EIS should take into account what is available and give serious weight to the ODFW plan that states a rigorous data collection is needed in the sampling schemes for lek counts. The same is true for many areas of the sage grouse habitat and other wildlife issues. Discussing science is not the same as doing science. The basic principles of doing science requires a good study design, rigorous data collection, and analysis. - Population ecology - Understanding annual survival and seasonal mortality is critical and largely undocumented in Oregon. Similarly there is still a need to refine methods to estimate population sizes. Similarly, development of a probabilistic sampling scheme for lek counts is paramount to provide some level of rigor to the data collection. (Oregon Dept. Fish and Wildlife, April 2011. Greater Sage--Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat). - Survival of sage-grouse is typically high with more than approximately 60% of a cohort surviving from year to year. - Of the 40% of a grouse population that succumbs to mortality during a year predation accounts for approximately 85% of reported non-hunting mortalities and 79% of nest failures (Bergerud 1988). - Specifically, predation on nests and young chicks can be high and affect populations (Gregg et al. 1994, Aldridge and Brigham 2001, Schroeder and Baydack 2001, Coates 2007). However, few studies have indicated that predation is a major limiting factor to sage grouse. - In Idaho, predation was the most common cause of death for radio-marked sage- grouse (83% of males and 52% of females) in a hunted population (Connelly et al. 2000a) where apparent survival was 71 and 68% for male and female sage- grouse, respectively. Coyotes (Canis latrans), badgers, (Taxidea taxus), bobcats (Felis rufus), and several species of raptors are common predators of juvenile and adult sage-grouse throughout most of sage-grouse range (Hagen 2011). Additionally, coyotes, badgers, common ravens (Corvus corax), and blackbilled magpies (Pica pica) commonly prey on sage-grouse eggs (Hagen 2011).	All	Both	emc0222GB
68.	Please look into improving the Sage Grouse sage brush habitat environment by re-vegetation measures after wild fires which are the main cause of the loss of the habitat. Immediate re-seeding of sage brush, bitter brush, etc., would help choke out the cheat grass which prevents the growth of the habitat plants the Sage Grouse needs.	All	Both	emc0229GB
69.	Vegetation treatments without improved management will be very short lived. Local Sage Grouse working groups should play a major role with respect to sage grouse habitat projects	All	Both	emc0233GB
70.	Increase grazing by cattle, sheep, and horses to bring the over abundant fuel load of cheat grass and other non-native	All	Both	emc0241GB

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	species of plants down to end the danger of catastrophic wildland fires. Managed and rotated grazing has beneficial effects for the sagegrouse by removing woofy dead grasses and stimulating softer forages.			
71.	The BLM should continue to encourage a wide range of vegetation management tools that have utility in the restoration or conservation of sage grouse habitat. Taking a hands-off approach to vegetation management is usually counter-productive.	All	Both	emc0242GB
72.	Indeed, human disturbances of all sorts, roads, railways, fences, reservoirs, towns, homesteads, farms, mines, etc. flourished in the early to mid 1900s, and so did the sage-grouse. The mere presence of human activity seems to have little biologically relevant connection to sage-grouse population trends. However, specific human activities appear to correlate positively with GSG population trends. Livestock grazing management, with its associated intensive development of meadows, hayfields, and surface water sources increased markedly in the Great Basin in the late 1800s and early 1900s, and GSG populations boomed. During this period, high livestock densities (both sheep and cattle) reduced fine wildfire fuel loads across the Great Basin, and wildfires were rare and small. High densities of livestock dung also supplied an abundance of insect activity, particularly in closely grazed meadows and riparian areas, and the close grazing stimulated succulent new herbaceous growth and increased the forb component in these meadows and riparian areas, thereby increasing the quantity and quality of the forage supply for sage-grouse. At the same time, concerted predator control was practiced. In fact, predator control was encouraged, subsidized, and implemented on a vast scale by the Federal and State governments. By the mid 1900s, Federal and State regulations were implemented and all of the grazing management practices discussed above were controlled and moderated. The GSG population boom moderated at about the same time. By the late 1960s, livestock numbers and grazing levels were significantly scaled back across the west, and predator control programs were largely curtailed. Fire fuel levels increased, and the incidence of large-scale wildfires rose exponentially. GSG population trends reversed and started to rapidly decline.	All	Both	emc0251GB
73.	Weed eradication is vital and manageable with education of users and volunteers (not just money and one sided weed programs). The answer to less and less weeds instead of the current trend or more and more weeds is education and volunteers from user groups and from litigating special interest groups would go far in solving the cheat grass and medusa head overpopulation. Cheat grass and medusa head are the two weeds with the most potential to take over and destroy sage grouse habitat and they are the closest and most accessible for spread by man and animal and machine. (Some individuals actually do not understand the workings of stewardship of nature. You must tend the garden to yield a product be it natural habitat or noxious invasive weeds each need man's assistance.)	All	Both	emc0257GB
74.	There are also several cumulative effects that must be considered. For example, livestock grazing in combination with drought and climate change can have a severe impact on sagebrush communities. Fire risk to sagebrush habitats may also increase, as livestock consume native vegetation and spread noxious weeds and invasive plants. And when grazing is combined with other disturbances, sagebrush habitats may experience greater shrub loss and increase the chances of the introduction and spread of cheatgrass compared to landscapes having a single source of disturbance.	All	Both	emc0276GB
75.	The importance and impacts of grazing pressure, rest, and rotation on the condition of sagebrush landscapes and the capability of these sagebrush habitats to support sage-grouse are not fully understood, largely due to a lack of research and experimentation. Also, impacts to sage-grouse may be different depending on which season and stage of life is being considered: breeding, nesting, brood rearing, or wintering.	All	Both	emc0276GB

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76.	Habitat manipulations by land management agencies, including habitat alterations and land treatments, may lead to a decline in suitable sage-grouse habitat. For example, the use of herbicides and pesticides can kill plants and forbs necessary for sage-grouse survival. Habitat manipulations used to increase forage for domestic livestock or other ungulate wildlife species include chemical and mechanical treatments to remove sagebrush, and is often followed by reseeding with nonnative plants. Such habitat manipulations alter the natural food web and chance the nutrient dynamics for sage-grouse. Additionally, such alterations in combination with other impacts may further negatively affect sage-grouse habitat. For example, the seeding of nonnative plants may spread beyond the boundaries of the treatment area. And in combination with fire and other disturbance regimes, sagebrush removal and reseeding with nonnative plants may seriously affect the vegetation structure used by greater sage-grouse. Climate change may also play a role in the expansion of nonnative plants and the recovery capacity of such areas to reestablish a healthy sagebrush ecosystem.	All	Both	emc0276GB
77.	Climate change will not only affect the distribution of wildlife but also affects vegetation and plant life. Although most plants respond positive to increased carbon dioxide levels, many invasive nonnative plants respond with greater growth rates than native plants, including cheatgrass. Similarly, field studies reveal that cheatgrass demonstrates significantly higher plant density, biomass, and dispersed seeds at elevated carbon dioxide levels. Depending on the future precipitation regime, studies anticipate that cheatgrass is likely to move northwards, leading to expansion into Idaho, Montana, and Wyoming. This prediction, in conjunction with analyses suggesting large displacement and reduction of sagebrush habits as a result of climate change as early as 2030, increases the likelihood that climate change will negatively and potentially severely impact sage-grouse and sagebrush habitat. Additionally, cheatgrass invasion may also lead to an increase in the likelihood and severity of fires, causing further damage to an already weakened habitat.	All	Both	emc0276GB
78.	Similarly, the agencies should prohibit land treatments within priority sage-grouse habitat unless it can be demonstrated that such actions will result in a net benefit to sage-grouse in the short term and the long term. This is in line with the Technical Team Report's directive to "[o]nly allow treatments that conserve, enhance or restore sage-grouse habitat."32 Such treatments include prescribed burns and use of pesticides and herbicides. The Technical Team Report's proposed measures do not go far enough in respect to fuels management, often providing exceptions for allowing fires that may not protect sagebrush adequately in sage-grouse habitat.33 We suggest that the agencies revisit the criteria recommended by the Technical Team Report and strengthen requirements to ensure that land treatments, including fuels management, are not implemented unless they would not harm and would benefit sage-grouse in priority sage-grouse habitat. See infra Sections III.F & G for more information on the threats associated with prescribed burns and other habitat manipulations.	All	Both	emc0276GB
79.	Because invasive plants and noxious weeds can degrade and destroy sagebrush habitats, the agencies should focus on identifying known locations and areas of future risk for top priority invasive plant species and noxious weeds, including cheatgrass. Once these priority areas are identified, the agencies should develop and use a model to predict population outcomes and potential habitat changes as a result of potential changes in vegetation from invasive plant species or noxious weeds. All activities within sagebrush lands should be managed in a way that minimizes the potential for the introduction and/or spread of invasive plant species and noxious weeds.	All	Both	emc0276GB
80.	In our experience, well-designed reclamation of public lands impacted by mining can ultimately lead to higher value habitat than if the same lands were left unmanaged. We believe that this principle applies to sage-grouse habitat as well. For	All	Both	emc0277GB

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	example, it is generally accepted that noxious invasive species like Bromus tectorum (cheat grass) have significantly degraded vast areas of former sage-grouse habitat. Conversely, pinyonjuniper succession can lead to conversion of prime sage-grouse habitat into comparatively low-value woodlands. During mine reclamation, Barrick routinely restores such low-value habitats into prime potential sage-grouse habitat. Thus, when coupled with appropriate reclamation requirements, mining activi ty on public lands can play an important role in restoring sage-grouse and other species to long-term viability.			
81.	Barrick has conducted assessments of the ranches adjacent to some of its mining operations that may be useful to the agencies, particularly if the agencies are interested in evaluating the potential for mitigation projects or "banks" in these areas. These same type of assessments are being included in the baseline studies conducted on potential mine development sites. This information may be available for the NEPA analysis and may allow for determination of impacts and mitigation for the impacts. The existing information for the ranches provides guidance and opportunity for where off-site mitigation can be conducted within the vicinity of the impacts.	All	Both	emc0277GB
82.	• Habitat fragmentation: The definition of habitat fragmentation needs to be clearly defined to ensure that treatments that remove sagebrush in an effort to maintain the integrity of the ecological site with the eventual reestablishment of sagebrush on the site are not considered actions that fragment the habitat. The various phases of the ecological site plant community are not fragments, but parts of the overall landscape-scale habitat for sage-grouse. • Unfragmented habitats: The meaning of unfragmented habitats should be clearly defined. For example, if a wildfire breaks a large area of intact habitat into two large areas, and the burned area converts to cheatgrass or other non-native annual species, then this burned area may be considered fragmented. However, if the area that burned realizes the establishment of native perennial grasses and forbs, then this is the first phase of the rehabilitation of the site back to sagebrush-grassland and the area may not be considered as being fragmented-the ecological site is still intact and will support sage-grouse habitat. Areas that have been burned or otherwise converted to non-native ranges may be considered for rehabilitation with the goal of re-establishing native perennial grasses and forbs, and eventually, big sagebrush.	All	Both	emc0277GB
83.	• Protection of intact sagebrush communities: "Protection of intact sagebrush communities" should recognize that the integrity of the ecological site may include various phases with little to no sagebrush, allowing sagebrush to reestablish in an appropriate time period. This type of management or vegetation treatment sustains the long-term maintenance of intact sagebrush communities. "Protecting" intact sagebrush communities from disturbance increases the risk of catastrophic fires in the shrub-dominated communities and increases the risk of conversion to non-native annual species, with the subsequent loss of sage-grouse habitat. The term "protection" should be replaced with "management" as these ecological sites are disturbance driven in the Great Basin.	All	Both	emc0277GB
84.	• Large intact sagebrush communities: The definition of large intact sagebrush communities needs to be clearly stated. In the context of the ESD and State and Transition Models, this means maintaining the integrity of the ecological site, which includes various phases of vegetation on the landscape such as a grass-forb phase, a grass-forb/shrub phase, a shrub/grass-forb phase, and shrub dominated phase. It does not mean that large areas of old, decadent sagebrush should be maintained on the landscape. Old, decadent sagebrush cannot be maintained on the landscape as lightning ignitions occur frequently in this vegetation condition and the large intact nature of such stands results in extremely large burned areas that	All	Both	emc0277GB

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	bum with extreme intensity and result in high plant mortality.			
85.	Three percent anthropogenic disturbance restriction: Please provide the scientific basis for the 3% figure. What is the basis for establishing a numerical threshold? How was the 3% figure identified? Were any other figures considered, and if so, why were they rejected? How is the boundary delineated? What would be considered acceptable mitigation to avoid the threshold? For example, if a burned area was reseeded with perennial grasses and shrubs, do the shrubs have to be established and 3 feet tall to be considered successful reclamation? If so, then this could take several years.	All	Both	emc0277GB
86.	• Seventy percent land cover for priority habitat: Please explain the recommendation to "manage or restore priority areas so that at least 70% of the land cover provides adequate sagebrush habitat to meet sage-grouse needs." This recommendation does not appear to take into account ecological sites that occur within these large areas that do not have the capacity to provide the cover requirements of sage-grouse. What is the scientific basis for the 70% figure? What is the basis for establishing any numerical threshold? How was the 70% figure identified? Were any other figures considered, and if so, why were they rejected?	All	Both	emc0277GB
87.	• Migration: The Technical Report provides that priority sagegrouse habitats should include "migration or connectivity corridors." Please explain why connectivity corridors are necessary when sage-grouse migration is completed by flight. Nonetheless, connectivity corridors are likely to exist when narrow strips of habitat link higher and lower elevation habitats. Such connectivity is generally broken by natural processes, such as encroachment by pinyon-juniper, not anthropogenic activities. What is the scientific basis for this designation? How will the agencies identify these corridors?	All	Both	emc0277GB
88.	• Mitigation: Absolute disturbance or land cover requirements (for example 3% anthropogenic activities or 70% land cover) eliminate the role and potential of on- and off-site mitigation to improve the area. For example, a project may be authorized that disturbs more than 3% of a given area. If the project includes mitigation of what is otherwise poor habitat within the area or off-site, there may be a net habitat benefit that would not otherwise occur without the development-mitigation relationship. How will the agencies provide for appropriate mitigation?	All	Both	emc0277GB
89.	The management plan revisions must comply with multiple use and sustained yield requirements Barrick's experience is that productive uses can co-exist with, and benefit, sagegrouse when coupled with appropriate conservation measures. Noxious weeds, wildfires, and pinyon-juniper encroachment have degraded vast areas of potential sage-grouse habitat. During mine reclamation, we routinely restore such low-value habitats into prime potential sage-grouse habitat. Our ranches also provide off-site restoration opportunities that possibly would not be available without their connection to mining operations. We believe the best way to provide for protection of the sage-grouse, while simultaneously allowing continued economic development, is for BLM to develop conservation measures in cooperation with the regulated community that include a strong but pragmatic mitigation program. Therefore, our comments request that the EISs recognize multiple use principles and feasible alternatives that include mitigation opportunities that will promote sage-grouse conservation.	All	Both	emc0277GB
90.	The management plan revisions must comply with multiple use and sustained yield requirements The agencies are required to manage for "multiple uses." However, the BLM Technical Team's conservation measures prioritize sage-grouse management to the exclusion of other uses. For example, as noted above, one measure would prohibit any disturbances	All	Both	emc0277GB

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	affecting more than 3% of priority sage-grouse habitat. 17 That restriction seemingly would preclude any roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells, pipelines, landfills, homes, mines, or other uses from affecting more than 3% of priority habitat. See id. BLM also proposes to withdraw priority habitat from mineral entry, threatening existing and future mining claims. 18 The scoping analysis should recognize that the proposed revisions must comply with the agencies' multiple use mandates.			
91.	We have seen positive effects on rangeland function and GSG from strategic vegetative treatments when done in conjunction with time-controlled, rotational grazing (see below).	All	Both	emc0281GB
92.	Please remember these landscapes often provide essential habitat to multiple species-some of which require old-age sagebrush canopies and others requiring early seral conditions. A well managed landscape is managed not to maximize value for any one specie (whether cattle or sage grouse) but rather maximizes overall value by 'optimizing', or maintaining viable habitat for multiple species (including wildlife and livestock, Danvir et al 2005).	All	Both	emc0281GB
93.	Our observations on sagebrush rangelands throughout the GSG range has been that the best way to create healthy GSG habitat and meet rangeland standards is to graze right - by implementing rotational grazing whereby plants experience periodic defoliation in a relatively short time period (generally 1 month or less) followed by a period of adequate growing season rest from grazing for plants to recover. If properly implemented, this practice will increase herbaceous plant cover and litter at the expense of bare ground-increasing soil moisture and plant productivity.	All	Both	emc0281GB
94.	Conversely, reducing stocking rates without shortening the grazing period and lengthening the rest-recovery period does little to improve rangeland health, increases fire intensity, and will continue to harm some herbaceous plant species.	All	Both	emc0281GB
95.	SRCA agrees that included with fire is the threat of invasive species. Livestock grazing should be used to reduce fine fuels. Grazing is by far the cheapest and most effective way to minimize wildfires while maintaining and or creating healthy ecosystems. Herbicides, diesel and man hours are expensive. (Smith et al., 2012) (USDA, 2006)	All	Both	emc0289GB
96.	Avoid vegetation treatments that reduce the amount and height of sagebrush, especially those that use drastic means such as tractors and chemicals.	All	Both	emc0297GB
97.	Another significant management factor that BLM in the Great Basin should not use in the Sage Grouse Management Plan in the Great Basin is the height of grass. At the hearing where Sage Grouse biologist Peter S. Coates made a presentation he said that grass height in most the areas of the Great Basin would not be appropriate to use for a management guideline. The use of Grass height is important in those ecosystems where grass was the predominant cover available for Sage Grouse to nest in.	All	Both	emc0299GB
98.	Measures that the BLM has the power to enact that will have the greatest benefit to sage grouse numbers are likely maintaining or increasing their access to reliable water sources, reducing wildfire number and severity, and increasing new herbaceous growth and forb diversity. Livestock grazing promotes all these aims.	All	Both	emc0301GB
99.	We do not advise large prescribed fire in GSG or big game winter ranges in Wyoming big sagebrush, particularly at low elevations and precipitation (less than 10 inches annual precipitation). However, our observations have consistently shown that smaller (25-200Ha) openings created in large (>500Ha) expanses of mountain and Basin big sagebrush in excess of 25% canopy coverage and above 2000m in elevation are used as brood habitat by GSG, and (based on increased lek attendance, lek persistence, and new lek development) can increase GSG populations. We have successfully implemented cool season	All	Both	emc0303GB

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	burns, chemical, mechanical treatments to thin brush and release herbaceous vegetation (Oanvir 2005). The overall effect is early seral openings in a sagebrush sea. Hunnicutt 1992 clearly showed that hens selected nest sites in homogeneous sagebrush patches at least 300m in diameter for nesting, but immediately moved broods to highly heterogeneous areas having an interspersion of sagebrush cover and grass-forb dominated feeding areas. Pronghorn populations (Aoude and Oanvir 2002) showed similar production and population increases.			
100.	Please remember these landscapes often provide essential habitat to multiple species-some of which require old-age sagebrush canopies and others requiring early seral conditions. A well-managed landscape is managed not to maximize value for anyone species (whether cattle or sage grouse) but rather maximizes overall value by 'optimizing', or maintaining viable habitat for multiple species (including wildlife and livestock, Oanvir et al 2005).	All	Both	emc0303GB
101.	Page 8-"Coordinate BMPs and vegetative objectives with NRCS for consistent application across jurisdictions where the BLM and NRCS have the greatest opportunities to benefit Greater Sage-Grouse, particularly as it applies to the NRCS's National Sage-Grouse Initiative." We concur with this policy.	All	BLM	emc0303GB
102.	We have found that by implementing multi-pasture grazing systems, having 5-15 pastures per herd, large herds, large pastures, allowing adequate periods for plant recovery (generally 12 or more months) and providing season long rest to approXimately 20% of pastures annually we see increased upland and riparian herbaceous vegetation and decreased bare ground while maintaining a healthy brush component (Danvir 2002, Danvir et al 2005).	All	Both	emc0303GB
103.	The terms "habitat fragmentation" and "unfragmented habitats must be clearly defined in the EIS as well as how these terms related to disturbances (i.e. fire) and to rehabilitation and natural plant succession.	All	Both	emc0310GB
104.	The EIS must clearly define "large intact sagebrush communities" as it relates to plant succession, the potential for wildfire and suitability for sage grouse habitat.	All	Both	emc0310GB
105.	The EIS must address how the BLM and the USFS will manage vegetation types over time considering natural plant succession. It is the responsibility of the land management agencies to ensure the proper management of current and future habitat and vegetation status to ensure the maintenance and improvement of habitat and population numbers given the ever-changing status of plant communities.	All	Both	emc0310GB
106.	EIS alternatives should include programs such as incorporation no net habitat loss. A current survey habitat in a proposed project area would allow for classification according to established standards. The proposed action could demonstrate avoidance whenever possible and mitigate any loss through an established or approved restoration program.	All	Both	emc0310GB
107.	The EIS and alternatives must analyze documented trends in pinion and juniper (PJ) succession on rangelands and sage grouse habitat including proposed measures to reduce PJ aerial extent and future migration. The EIS must also evaluate the impacts such efforts may have on other species of concern	All	Both	emc0310GB
108.	The introduction of non-native annual grasses to the fragile ecosystems in the west have caused massive ecosystem transformation. Western Juniper has also become invasive to areas that did not historically have it - due to occasional fire - and has degraded much of prime sage grouse habitat at higher elevations. Many of the ecosystems/habitat in the West are dependent on occasional fire, to maintain ecosystem functionality	All	Both	emc0314GB
109.	Use ecosystem functionality as the prime strategy for rangelands management, for sage grouse and associated species, including for domestic livestock.	All	Both	emc0314GB

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110.	Reduce and reclaim areas of large scale prime habitat changes caused by Western Juniper proliferation.	All	Both	emc0314GB
111.	The use of herbicides to kill sagebrush and rabbitbrush is unacceptable to us for many insects such as important pollinators and prey base species, mammals, reptiles, and birds use these areas throughout the year.	All	Both	emc0316GB
112.	We believe Juniper "treatment" projects should be carefully planned because high numbers of sensitive bird species are often associated with juniper habitat. We believe the real problem is that livestock permittees and agencies often use juniper "invasion" as an excuse to open up land for grazing. If not done in a thoughtful manner, juniper removal may cause undesirable and, in most cases, irreversible impacts to a stable area by promoting the establishment of invasive grasses and weeds. Juniper "treatment" accomplished by machinery or fire, results in erosion, drying out and compaction of soil, higher ground-level temperatures, lack of shade and protection for wildlife. It exposes native plants and seeds (sometimes the only ones left in the area due to overgrazing) that sprout after snow or rain and are subsequently eaten and/or trampled by livestock. Many native plants, especially early forbs and grasses, are considered "dessert" by livestock and are the first to be utilized. The treatment areas are highly susceptible to invasion by weeds and grasses because of soil disturbance and higher temperatures, which create ideal conditions for germination and growth. This makes them susceptible to a vicious fire cycle that degrades the landscape. Fires, aided by higher fuel loads, blast through overgrazed and vulnerable mesic and riparian areas and create habitat suitable only for cheat grass, medusahead and halogeton etc.. We believe in most cases, livestock (overgrazing) are the reason for juniper invasion. Cows will not eat juniper (unless left to starve). However they will eat pretty much anything else. Left alone, with competition from native grasses and shrubs eliminated, juniper thrives. If the area was given ample time to stabilize, juniper projects done correctly, such as using a mosaic pattern, then juniper could be controlled in a way that would not be detrimental to Greater Sage-grouse or Juniper Titmice. We have the same concerns about sagebrush removal projects. The term "decadent" is often used as an excuse to chain, burn, spray, or Dixie harrow sagebrush to create more grazing opportunities.	All	Both	emc0316GB
113.	The goal of the conservation measures as indicated on page 6 of the NTT report is to "Maintain and/or increase sage-grouse abundance and distribution by conserving, enhancing, or restoring the sagebrush ecosystem upon which populations depend in cooperation with other conservation partners." There are a lot of concepts included in this goal that need clarification. For example, to increase sage-grouse abundance and distribution implies that other resource uses will be diminished and how will that decision be made? The sagebrush ecosystem is a disturbance based system in Nevada, where fire, floods, insect outbreaks, and drought have removed sagebrush from areas of the landscape for periods of time and perennial grasses and forbs dominate after the disturbance. This is followed by a period of time when grasses, forbs, and young shrubs are present, and as the shrubs increase in stature and abundance, the grasses and forbs decline until there is a sagebrush-dominated plant community, ready for the next disturbance. If "conserving, enhancing, or restoring the sagebrush ecosystem" means maintaining these various phases of the sagebrush community on the landscape, then many land uses can be accommodated. However, the report implies that only the sagebrush-dominated phase is important. I disagree and believe that a healthy ecosystem is one with many phases of the sagebrush ecosystem present on the landscape. This concept is much more in concert with the Ecological Site Descriptions and the State and Transition Models being developed by Natural Resource Conservation Service.	All	Both	emc0322GB

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114.	In addition, the list of "negative" aspects of herbivory does not recognize that many of these same conditions can be achieved in the absence of grazing. Plant dynamics of the various sagebrush ecological sites will result in shrub-dominated vegetation over time in the absence of disturbance. Therefore, the lateral cover necessary for nesting and the changes in sage-grouse habitat due to shrub-grass competitive dynamics create habitat conditions unfavorable to sage-grouse nesting, early brood habitat, and pre-laying habitat. While proper grazing management can be a beneficial tool, improper vegetation management can be a detriment to sage-grouse.	All	Both	emc0322GB
115.	The section on Treatments to Increase Forage for Livestock/Wild Ungulates, page 16 is very single-species oriented and does not uphold the principles of multiple-use management. The socio-economic impacts of these conservation measures should be analyzed in the EIS. In addition, many of the sagebrush ecological sites can only be maintained through periodic disturbance, releasing the perennial grasses and forbs before they become too scarce from competition with shrubs, and so scarce that non-native "invasive can establish on the site. Treatments of sagebrush are not always intended to .increase livestock forage, but are useful ways to maintain the integrity of the ecological site	All	Both	emc0322GB
116.	Our recommendations for management policies in sage-grouse habitat follow. Avoid sagebrush reduction/ treatments to increase forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species.	All	Both	emc0329GB
117.	So called "habitat improvement" projects, such as mechanical sagebrush treatments and prescribed fire, can be detrimental to greater sage-grouse and other sagebrush obligate species. Scientifically defensible research is needed to determine which activities are beneficial. This information should be maintained in a single federal database.	All	Both	emc0329GB
118.	• IM 2012-043 o Designation of Preliminary Priority or Preliminary General Habitat Areas The IM defines preliminary priority habitat areas as those that have been identified as having the highest conservation value to maintaining sustainable greater sage grouse populations, and include breeding, late brood-rearing and winter concentration areas. While the 1M states that these areas have been identified by BIM in coordination with state wildlife agencies, the public has had little or no input into the process of designating such areas. Furthermore, accurate maps that identify key habitat areas have not been provided. The January 10, 2012 Western Association of Fish and Wildlife Agencies habitat map, delineating these designated habitat areas, was used during the IM roll-out meetings at BIM offices. However, subsequent discussions with state and field office staff have determined that those delineations are already being significantly modified by state wildlife agencies. It is difficult for us to determine potential impacts or issues appropriate for scoping when the extent of the area is unknown. BIM must provide better maps identifying the designations as well as ensuring that designations are based on clear criteria and sound biological data. Many efforts to identify sage grouse habitat have incorporated "broad brush" analyses that do not appear to include adequate site specific field verification. For example, the mere presence of intact sagebrush habitat alone is not a sufficient indication of sage grouse habitat. Moreover, historic range is not an appropriate measure for identifying current sage grouse habitat or distribution. Some of the area currently mapped by the Nevada Department of Wildlife is occupied by cheatgrass and other non-native invasive annual species, pinyon-juniper woodlands, and salt desert shrub vegetation. These areas do not provide suitable sage grouse habitat, and thus do not warrant habitat designation. Accordingly, it is essential that any sage grouse habitat designations be based on clear criteria and sound biological data. Broad, over-inclusive geographic designations are inappropriate and may have substantial adverse effects on multiple use activities on federal lands while providing no benefits to the species. BIM should ensure that project	All	Both	emc0331GB

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	proponents have an opportunity to confirm the habitat designations based on site specific information at the time specific actions or projects are proposed. If site specific information (Le. the best scientific information available) demonstrates that previously designated habitat does not meet the criteria for general or priority habitat, then adjustments to those habitat boundaries and/or designations are appropriate and must be made by BIM without the need for a formal IMP or RMP amendment.			
119.	VI. BLM and USFS Must Evaluate a Reasonable Range of Alternatives In light ofthe different reasons for sage-grouse habitat decline from region to region, and the fact that there remains significant sagebrush habitat in Wyoming and Nevada, each sub-regional EIS should carefully evaluate a reasonable range of alternatives to the conservation measures and regulatory mechanisms proposed in the NTT Report. Some of the contemplated measures may not be necessary or effective in each region or sub-region. Examples of such alternatives include, but are not limited, to the following: E. The Improved Fuels Management and Fire Suppression Altemative The EIS should evaluate the impacts associated with more effective and better-funded fuels management measures and fire suppression measures when wild fires do occur. This is especially important for the EIS to be completed in the Great Basin Region, where wildfires are considered a primary factor in habitat fragmentation.	All	Both	emc0335GB
120.	In light of these statutory requirements, the BLM must consider the etfects of invasive species, such as cheatgrass, upon the ability to regenerate sagebrush after a fire or other disturbance. The BLM must analyze the effects of fire resistant species, such as kochia, upon the spread of wildfire, and the resultant protection of sagebrush.	All	Both	emc0337GB
121.	Climate change is projected to impact sagebrush habitats, and also to potentially impact sage-grouse survival and reproductive success. Despite this fact, climate change is not listed as a preliminary issue in the Notice of Intent for the greater sage-grouse planning process. This oversight has to be effectively remedied at the Draft EIS stage, the agency must include a comprehensive analysis of the predicted climate change impacts to sage-grouse and any proposed management regime must take into account the cumulative effect of climate change and other impacts and provide protections sufficient to recover and conserve the sage-grouse despite these threats. Climate change impacts that must be analyzed include, but are not limited to: · Increased temperature and increased precipitation allowing expansion of woody vegetation from higher elevations. · Increased temperature and decreased precipitation shifting the balance toward more drought-tolerant desert plants. · Alteration in fire regime from a warmer climate, which would be problematic for fire intolerant sagebrush. · The spread of invasive annual grasses, such as cheatgrass, which have a very different growth form than the native bunch grasses and can lead to more severe fire. · Drought conditions, which have been shown to negatively impact nest success. · West Nile virus, which may worsen with warmer summertime temperatures that speed the development of the virus within the vector mosquitoes.	All	Both	emc0339GB
122.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - The increase in the distribution and density of conifer woodlands is a significant threat to the sagebrush ecosystem.	All	Both	emc0343GB
123.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Site-adapted species of native plants are not available in the quantities needed to meet desired restoration program goals.	All	Both	emc0343GB
124.	Livestock grazing is considered the single most important influence on sagebrush habitats and fire regimes throughout the Intermountain West in the past 140 years (Knick et al. 2005: 68). Grazing is the most widespread use of sagebrush steppe	All	Both	emc0343GB

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	and almost all sagebrush habitat is managed for grazing (Connelly et al. 2004; Knick et al. 2003; Knick et al. 2011).6 Livestock grazing disturbs the soil, removes native vegetation, and spreads invasive species in sagebrush steppe (Knick et al. 2005). Cattle or sheep grazing in sage grouse nesting and brood-rearing habitat can negatively affect habitat quality; nutrition for gravid hens; clutch size; nesting success; and/or chick survival (Connelly and Braun 1997; Beck and Mitchell 2000; Barnett and Crawford 1994; Coggins 1998; Aldridge and Brigham 2003). Livestock may directly compete with sage grouse for grasses, forbs and shrub species; trample vegetation and sage grouse nests; disturb individual birds and cause nest abandonment (Vallentine 1990; Pederson et al. 2003; Call and Maser 1985; Holloran and Anderson 2003; Coates 2007).			
125.	The recovery of sagebrush "treatment" areas is further complicated by livestock grazing, which can hamper the establishment of native plants and spread the seeds of noxious weeds such as cheatgrass. Lambert (2005) recommended protecting re-seeded areas from livestock grazing for no less than 3 to 5 years. However, this standard is virtually never adhered to in practice in the West, where virtually every acre of public land falls within a grazing allotment.	All	Both	emc0343GB
126.	Finally, BLM needs to support efforts to improve rangelands by removing pi and juniper, and other undesirable brush. Pi over juniper sagebrush sites at the upper elevations, encroachment has contributed to the demise of summer sage grouse habitat. This has been due primarily to the lack of fire on these wetter sites. The encroachment of these species has reduced prime sage brush habitat. Too often these projects are postponed.	All	BLM	emc0371GB
127.	The use of prescribed fire to reduce fuels loads or enhance sage-grouse habitat must be addressed in the RMP amendments.	All	Both	emc0376GB
128.	The BLM should continue to encourage a wide range of vegetation management tools that have utility in the restoration or conservation of sage-grouse habitat. Taking a hands-off approach to vegetation management is usually counterproductive.	All	BLM	emc0376GB
129.	In the semi-arid rangelands of the Great Basin, the unstable moisture occurrence results in drastic growth differences of many plant species. Along with the mmbinations of other various factors, this can and does strongly affect numerous animal species. Those species that can handle the severe up's and down of the Great Basin survive the best. Unfortunately the GSG does not handle those up's and downs well.	All	Both	emc0388GB
130.	Vegetation management. Issue: Past and current vegetation management has affected vegetation composition, height and cover to the detriment of sage-grouse. Issue: Past monitoring methods failed to establish baseline data for ecological site potential or habitat characteristics needed for sage-grouse. Issue: Current upland rangeland health assessment methods fail to include indicators required for sage-grouse habitat. Issue: Reference areas for upland ecological sites are too few or too small and as a result, dependent habitat assessments lack objectivity and verification.	All	Both	emc0391GB
131.	Conifer encroachment and recovery. Issue: Some native conifer species are encroaching on sagebrush steppe; other native conifers are reoccupying historic range. Both phenomenon affect sage-grouse, although management must address encroachment and recovery differently	All	Both	emc0391GB
132.	Federal agencies have historically treated sagebrush steppe to increase forage for livestock, which included seeding extensive areas with nonnative plants to support livestock production. More recently, land managers have employed various sagebrush treatment methods (e.g., prescribed fire, mechanical means such as Dixie Harrow, chemical applications, and all accompanied with seeding efforts) to attempt to create or enhance sage-grouse habitat, such as brood rearing	All	Both	emc0391GB

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	habitat. Unfortunately, there is a dearth of long-term, well-designed10 scientific studies that document whether these sagebrush treatments benefit nest success or fecundity. Vegetation management in sagebrush steppe is an area that requires additional, carefully planned research. Of the existing research, there are many cases where sagebrush treatments specifically done for sage-grouse have not produced intended results. For example, two and three years after sagebrush was mechanically treated and seeded to improve sage-grouse nesting and broodrearing habitat near Alton, Utah, the percentage of forbs/grass cover in the treatment areas were less than half of the percentage of cover in breeding habitat reference areas, and less than half of the percentage of shrub cover in reference areas (Frey 2010, presentation). In addition, the average forb/grass height was also twice as high in breeding reference areas than in the treated areas (Frey 2010, presentation). Also during this period (2005-2007) sage grouse monitoring found that sage-grouse preferred the intact sagebrush stands to the treated areas (Frey and Heaton 2009, unpublished paper). BLM interim direction for sage-grouse management and planning (BLM Memo 2012-043) cites western Association of Fish and Wildlife Agencies (2009) as guidance for designing vegetation treatments in sagebrush steppe. WAFWA (2009: 1) states that "[i]n spite of considerable loss of functional sagebrush habitats from wildfire and other factors (e.g., energy development, agricultural conversion, and urban expansion), some natural resource professionals promote using different types of treatments to reduce sagebrush cover on remaining intact sagebrush habitats (Bunting et al. 1987, Wyoming Interagency Vegetation Committee 2002, Davies et al. 2008, McAdoo et al. unpublished report). These treatments include prescribed fire, mechanical alterations, herbicide applications and intensive, short-duration livestock grazing. Justification for these treatments have included the need to increase resiliency of sagebrush-grassland habitats to wildfire, improve forage for livestock grazing, diversify age-structure of sagebrush, reduce 'decadent' stands of big sagebrush, and enhance sage-grouse habitat (Wyoming Interagency Vegetation Committee 2002). We question the biological and ecological value of treatments that remove sagebrush in xeric sagebrush communities and are concerned about long-term negative impacts to sage-grouse."			
133.	Some juniper (Juniperus spp.) and piñon (Pinus spp.) species have increased in abundance and/or expanded into sagebrush steppe, primarily at higher elevations (Miller et al. 2011). Since 1870, concurrent with the introduction of domestic livestock and the resultant exclusion of periodic fire, the occurrence of western juniper (Juniperus occidentalis occidentalis) in the sagebrush steppe has increased approximately ten-fold in Oregon, northeastern California, northwestern Nevada, Idaho and Washington (Miller et al. 2005). Approximately 12 percent of the current distribution of sagebrush steppe is expected to be replaced, primarily by expansion of woody vegetation, with each 1° C increase in temperature (Miller et al. 2011). Sage-grouse habitat will be reduced as cheatgrass spreads at lower elevations and woody species eliminate sage-grouse habitat at higher elevations in sagebrush steppe (Miller et al. 2011). Natural Resources Conservation Service has recognized conifer encroachment as a threat to sage-grouse (e.g., NRCS 2009). The NTT report makes no specific prescriptions for addressing conifer encroachment	All	Both	emc0391GB
134.	Some juniper and piñon species are not encroaching on sagebrush steppe, but reoccupying areas from which they were removed by miners and settlers. Piñon-juniper were a source of fuel and fiber for communities, ranching and mining in some parts of the West in the Nineteenth Century Lanner 1981). With the end of widespread logging of these species, these piñon and juniper are returning to much of their historic distribution (Lanner 1981, Catlin et al. 2011, unpublished	All	Both	emc0391GB

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	research)			
135.	The Interim Management IM provides for the use of Ecological Site Descriptions (ESDs) when designing vegetation treatments. Although in theory ESDs are potentially useful in guiding management decisions, ESDs are incomplete or unavailable in several states and therefore may be limiting in assessing or guiding management decisions. In addition, enhancing native plant communities to the native shrub reference state is highly impracticable and partly dependent on the current land use in that plant community. These concepts are extremely theoretical and very challenging to implement.	All	Both	emc0399GB
136.	BLM's RMP revisions should not require use of Ecological Site Descriptions but should provide flexibility to use ESDs or other appropriate metrics to evaluate the success of vegetation treatments and reclamation efforts. Although ESDs can be useful to provide a reference for vegetation treatments, treatment objectives should be designed to meet rangeland health standards, management decisions, the objectives of the land use plan, and site-specific conditions or limitations.	All	Both	emc0399GB
137.	The EIS and its alternatives should avoid requirements for habitat mitigation and maintenance in perpetuity. It must be recognized that vegetation types are constantly evolving and changing. Mitigation in perpetuity is inappropriate and fails to recognize the realities and dynamic nature of vegetation communities and nature in general.	All	Both	emc0410GB
138.	Now BLM in this sage-grouse EIS is stating that it is indeed going to address allocations. As part of the process of amending the Land Use Plans in this EIS process, BLM must fully consider causal factors of weed invasions and fuels problems like grazing and the plethora of BLM's own treatments in making these allocations. It must change allocations, like livestock grazing, that promote weeds and flashy fine fuels like cheatgrass. BLM must also adopt an integrated weed management strategy, rather than the current Spray and Walk Away approach that ignores causes of weeds and fails to provide integrated weed/invasive species management. BLM treatment relies overwhelmingly on futile use of expensive chemical herbicides.	All	BLM	emc0411GB
139.	The primary, and often only, annual barometer of livestock use monitored by BLM is utilization. Utilization is based on aboveground biomass of grass plants, i.e. weight of the plant material and not height. Most of the weight of a native bunchgrass grass plant is towards the base of the plant. So 40% utilization often means that a plant that stands 12 inches tall can be grazed down to 3-4 inches in height and still be measured as having only 40% use. This height is too low to provide the necessary residual screening cover to conceal sage-grouse nests from visual and scent predators. Plus utilization is averaged across the landscape, so 40% average utilization means many plants receive much greater use. Those higher use levels are harmful to the crown of the bunchgrass plant, which is exposed to winter freezing and baking in hot sun. Harms to the plant from such use levels may be even worse during the active and critical growing period for the plant. Changes in species composition occur over time, and larger or grazing-sensitive grasses are depleted. Sheridan CEQ 1986, Mack and Thompson (1982), Anderson (1991), Jarbidge AMS (2007), U.S. Forest Service Utilization Gauge, Anderson 1991 BLM Technical Bulletin. In lands that have become depleted by historical grazing, and then are faced with continued annual chronic grazing disturbance, many larger-statured grasses are missing. So the plant community composition has been altered and depleted - with smaller statured increaser species replacing larger grasses (a symptom of desertification, see Sheridan CEQ 1986). Yet BLM often overlooks the utilization of the smaller grasses such as small native bluegrasses Poa that greens up with fall rains, and measures use only on scattered remnant larger grasses. Plus, BLM typically averages utilization over 40 or 50 grass plants. This means that if the average utilization at a site is recorded as 40% - some plants are	All	Both	emc0411GB

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	likely grazed to levels of 70% or more, which is quite damaging and can lead to injury, weakening/lack of vigor or death of the plant.			
140.	BLM also practices forage mining through extending facilities and salt and supplements. Areas closer to watering sites, flatter terrain, or other areas frequented by livestock become depleted. But rather than cutting livestock numbers, BLM has instead incrementally extended water systems and thus extended degradation of sagebrush upland sites, built more fences to enable more intensive use in ncreasingly depleted lands, and also killed sagebrush and trees to try to produce more forage and maximize continued livestock grazing numbers. This has enabled more intensive livestock disturbance of remnant better condition areas of the sagebrush uplands across public lands. Meanwhile, there is minimal, if any, improvement in the depleted sites. Livestock facilities have intensified use in many areas in recent decades, while the areas already highly impacted and depleted have not recovered. These sites are vulnerable to, and often are undergoing, weed invasions. Thus, this system of keeping as many cattle/sheep on the land as possible without cutting AUMs has resulted in incremental depletion equivalent to forage mining. Along with forage mining goes the need for ever more treatments. BLM has also aggressively manipulated and treated native communities rather than allowing passive restoration of damaged understories to occur. Rachel Carson in Silent Spring described the war on sagebrush that began in the late 1950s, and continued in the open for livestock forage for decades. This War continues to the present, papered over with misleading terms like fuels treatment, treatment of decadent sagebrush, habitat improvement project, but the end result is the same.	All	Both	emc0411GB
141.	Many newer land use plans have quite weak and uncertain goals, objectives, and provisions related to wildlife. Some of the newer BLM Land Use Plans have alarming provisions that are resulting in significant degradation of sagebrush and destruction of pinyon-juniper and other forested vegetation (including in areas of little importance to sage-grouse. Newer Ely BLM and Oregon Land Use Plans plans rely on large-scale manipulation and destruction of mature and old growth sagebrush communities - based on outdated claims of fire return/disturbance intervals and state and transition modeling that is used to justify removing sagebrush to generate flammable grass that then dries out quickly, becomes invaded by cheatgrass, and more readily carries frequent fires. Or they rely on use of fire or heavy equipment to treat trees. This results in destroying the sagebrush as well as making sites prone to cheatgrass and other weeds.	All	BLM	emc0411GB
142.	Passive restoration includes reducing or removing disturbances to allow natural ecological processes to return by stopping activities that cause degradation or prevent recovery. Some active restoration will also be required in some sites. However, active restoration should rely on removal of disturbances, intrusions, and harmful developments that degrade and fragment habitats. Replanting with native species (local native ecotypes) in areas where sagebrush has been eliminated or greatly reduced must be a key component of active restoration.	All	Both	emc0411GB
143.	We are greatly concerned that BLM will conduct excessive prescribed fire disturbance in WSAs under the guise of sage grouse habitat or "fuels." "Treatments" and artificial human manipulation of wild lands must be constrained. Why is there no mention of Forest roadless lands? The same must be applied to identified USFS roadless areas, Wilderness, and other unroaded lands. Plus FWS and other lands, as well - for example, the WSAs on Sheldon.	All	Both	emc0411GB
144.	In practice, "desired future condition" has been code in agency speak for proposals that alter, disturb and destroy sagebrush or other woody vegetation in order to promote grass (often exotic) for livestock forage projects. The desired future condition should be intact native sagebrush vegetation communities.	All	Both	emc0411GB

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145.	Agencies must also consider the threat of habitat loss and amount of risk of irreversible weed invasion and habitat fragmentation associated with treatment disturbance, and must fully consider the uncertainty that any substantial positive recovery may occur, and its pace. If agencies propose to kill, alter, thin, destroy mature of old growth sagebrush communities in vegetation manipulation projects, then how long will it take for a plant community with similar characteristics to recover? How does continued grazing disturbance slow, retard, or alter recovery for decades or centuries to come? How does continued grazing disturbance promote cheatgrass or other weeds, effectively truncating succession so that hoped-for recovery does not happen? Examples: Trampling seedlings, browsing/breakage of sagebrush cover, alteration of understory grasses and forbs, disruption of microbiotic crusts, etc. Current science-based recovery intervals must be used. So many of the existing projects including those of the past decade and continuing up to the present have been conducted based on false and now disprove claims of short historical disturbance intervals, and short claimed recovery intervals that had been erroneously promoted by Winward, Miller, and others with a range background. See Welch and Criddle (2003), Baker (2006), Baker Chapter in Knick and Connelly (2009). How many treatments exhibit much slower recovery of sagebrush, forb, microbiotic crust, and other community components than predicted?	All	Both	emc0411GB
146.	The reclamation actions are minimal, and given the time frame required for recovery of sagebrush, any recovery in the face of continued agency-sanctioned livestock grazing/trampling, weed infestations, climate change, etc. may not even be possible at all (see Baker Chapter in Knick and Connelly 2009 describing long time frames). The long time frame for any recovery must be considered before effects can be determined. BLM cannot rely on "desired plant community" in reclamation. BLM typically allows non-natives and aggressive cultivars of natives seeded for livestock forage to be the "desired" veg in rehab (ostensibly to ward off weeds). but in reality because such species provide livestock forage and may require minimal rest to become established - in comparison to sensitive native species. BLM must analyze adverse impacts of using exotics and/or cultivars - rather than local ecotypes of naturally occurring species. This all appears aimed at maximizing forage - rather than ecological compatibility. "Irrigation" to establish vegetation is out of place in arid wild lands. Use local native ecotypes, and require re-seeding until it is successful. Remove livestock disturbance back to any existing pasture fences.	All	Both	emc0411GB
147.	There must be full and detailed analysis of adverse impacts of the expensive and often polluting and/or hazardous herbicides and all their components and breakdown products that BLM increasingly relies on. BLM must provide new and updated analysis of its herbicide use, as significant new information an adverse effects of herbicides has emerged. Plus BLM has no integrated weed management plan at all - the Weed EIS merely covered herbicide use. And refused to examine or limit livestock, roading, or other disturbances or address causal factors in any way.	All	BLM	emc0411GB
148.	These provisions are weak and toothless. "Where appropriate ..design fuels projects to protect sage brush ecosystems..This leaves the door wide open to abuse by agency range staffers and managers to do whatever they want. Restore native plants and create patters[sic] which must benefit sage grouse."This enables further wanton destruction of sagebrush habitats under the guise of creating "patterns." In nearly all instances, the sagebrush landscape has a complexity of natural patterns - as well as many artificial human-caused patterns already. What patterns have been shown to significantly benefit sage-grouse -or pygmy rabbit? There is often natural heterogeneity in sagebrush landscapes that provides a complex natural mosaic. Plant communities arbitrarily deemed "decadent" by agencies have diverse age classes.	All	Both	emc0411GB

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	Grassier areas dry out quickly, and appear to be promoting many frequent fires both immense and small. Areas of grass and seedings are now burning at great frequency in sites across southern Idaho. For example: The 2010 300,000 acres Long Butte fire in the Jarbidge. See WWP Long Butte fire Appeal, describing fire flashing across 300,00 acres of exotic and post-fire seedings with hardly any sagebrush present - in 2-3 days! BLM must fully investigate the role of crested wheatgrass and its post-fire rehab seedings in promoting fire frequency and greatly altered fire cycles.			
149.	BLM is not going to be able to prevent large wildfire. Fuelbreaks will not do that, and often promote weeds that fuel frequent fires. And if BLM attempts to engineer a massive series of fuelbreaks, it will only further fragment the sagebrush ecosystem and hasten its demise. So as an alternative, BLM must manage lands to be in the best possible condition using native species. That way, if an area burns, it is naturally more resilient and better able to recover. Livestock grazing must be removed if recovery is to be effective, and to occur without significant risk of cheatgrass and other weeds. Removal of grazing also hastens the speed of recovery. Thus, passive restoration -both before and after fires - is essential to resiliency, and reducing and minimizing the adverse effects of fire on wild land sagebrush habitats. In some instances, active restoration (re-seeding with local native ecotypes) may be necessary. But this must be followed by long-term removal of livestock grazing disturbance.	All	BLM	emc0411GB
150.	Treated lands continue to suffer intensive grazing or other disturbances, thus retarding or preventing altogether the recovery of sagebrush habitat components. "Mitigation" funds for new projects destroying sagebrush habitat (such as the wind farms, transmission lines, gas pipelines) may be used to deforest large areas, including sites. All such projects (past and continuing/foreseeable) must be evaluated honestly. It cannot be claimed that destruction of important sagebrush habitats can somehow be mitigated by cutting, chaining, or otherwise altering tree habitats until there is understanding and analysis of the ecological value of forests. Projects are being claimed to be sage-grouse projects in areas of minimal importance to sage-grouse. Funds are being diverted to these. Plus, if such projects make formerly forested areas more fire-prone - through creating hotter, drier, windier sites, this is likely to exacerbate fire risks to adjacent or interspersed sagebrush habitats. Deforestation may affect local weather patterns, resulting in hotter, drier, weed-prone, harsher, windier sites more prone to frequent fires.	All	Both	emc0411GB
151.	Did IDFG datasets or BLM exclude leks that have since been lost, and thus underplay importance of habitats recently lost to fire like Murphy. See page 4. Makela and Majors tried to identify patterns of habitat and non-habitat using burn severity. They assumed areas of low burn severity maintained largely the same habitat as before the burn. But burn severity says nothing about the presence of sagebrush, and there is no evidence that sufficient sagebrush may remain in areas of low burn severity. Burn severity may also depend on the characteristics of the vegetation that was present pre-burn. In fact, it is our observations in some areas of the Jarbidge and elsewhere that areas of low burn severity typically had reduced or limited sagebrush or other woody shrub structure over substantial areas pre-burn. This means that even if there are islands of unburned vegetation left in ow severity areas in a burn, the vegetation that is present may be primarily grass, or sparse shrubs not suitable for providing habitat essentials. It is unacceptable to map low severity burns as sagebrush habitat without ground-truthing. Because after all "low severity" still means the sagebrush burned, and is likely not providing sagebrush habitat essentials for sagegrouse. This is not to downplay the importance of any remaining unburned islands of sagebrush – but claiming that all of these areas are comprised of sagebrush helps agencies mask the severity of habitat loss	All	Both	emc0411GB

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	and fragmentation that has occurred. We find it very hard to believe that BLM did not have quite adequate veg data available, and/or did not make an effort to obtain, current high quality current information on sagebrush cover in burned areas so that a valid estimate of the remaining sagebrush within burn perimeters could be determined. In fact, it is our experience with the Murphy and other wildfires, that BLM uses a flush of fire funds associated with wildfires to immediately obtain detailed information about sagebrush persistence – often down to 5 to 10 acre polygons, or to even greater accuracy. Why wasn't this information used? Why didn't BLM collect at least current data on vegetation cover for this report that is now being used to segregate and doom some habitats? BLM claims that "due to our limited ability to effectively characterize "burn severity" in shrub systems, it is likely COH (Currently Occupied Habitat) in low severity is over-estimated". There is no valid reason for BLM not obtaining high quality data, especially now that this report and its various models are being used to discard habitats. This lack of accurate information adds to the uncertainty of heaping modeling exercise upon modeling exercise to try to guess at the slice of landscape one can sacrifice and still have sage-grouse be present, and the importance of particular lands to a population. Unless BLM understands how little habitat it has left, it can't understand how imperative protection and restoration are, or how it can possibly "sustain" habitats.			
152.	Conserving the Greater Sage habitat. And Sage -bru management.	All	Both	fla0053gb
153.	The sagebrush regions of the Great Basin and Rocky Mountain corridor are part of our great heritage as Westerners and Americans, still -vas habitat has been drastically impacted by invasive species such as cheatgrass, frequently exploitative use by grazing and mineral interests, and shortfalls in regulation and enforcement.	All	Both	fla0086gb
154.	In fact, as a scientist botanist I have plant colle lost because of indiscriminate cattle ranching. Valuable plants and habitat as a whole must be protected so that we don't lose the biodiversity we have and become poorer in the process	All	Both	fla0115gb
155.	The effort for these birds should also be seen in a larger context of restoring the sagebush steppe habitat that has been hammered by over grazing, vehicle use, and other impacts. I ask you to manage these lands for ecosystem health and be more aggressive about land conservation.	All	Both	fld0003rm fld0003gb
156.	Avoid vegetation treatments that reduce the amount and height of sagebrush, especially those that use drastic means such as tractors and chemicals	All	Both	flf0000gb flf0000rm
157.	I urge you to consider consolidated plan ammendments that will: reduce livestock grazing in priority habitat and potential recovery areas to restore native plants that the sage grouse depend upon;	All	Both	flg0000gb flg0000rm
158.	I urge you to consider consoliddated plan ammendments that would: avoid vegetation treatments that reduce the amount and height of sagebrush, especially those that use drastic means such as tractors and chemicals; and	All	Both	flg0000gb flg0000rm
159.	Any EIS or SEIS must also explicitly recognize the following points:The extensive encroachment of pinion-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much of the West.	All	Both	fli0000gb

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160.	The extensive encroachment of pinyon-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much of the West. The proposed range-wide guidelines do not recognize the variability of issues across the west and do not focus on or prioritize specific issues at the needed scale.	All	Both	flj0000GB
161.	The extensive encroachment of pinion [illegible] sagebrush communities has drastically decreased productive habitat for nesting and brood rearing sites for greater sage [illegible] much of the West. The proposed range the variability of issues across the west and do not focus on or prioritize specific issues at the needed scale.	All	Both	flj0002gb
162.	6) The NOI is silent on insuring that only allocalive andlor prescriptive standards (conservation measures to be imposed for any particul.tlr usc, vvill be predicaLed upon the existing vegetation and/or be within the ecological potential of a site. For example, BLM should not impose grazing restrictions based on herbaceous cover needed for nesting when there is not any existing sagebrush, which is also needed for nesting, within the area in questions. Also, BLM cannot mandate a particular residual grass cover height if the existing grasses do not have the potential to grow to the prescribed height and/or the prescribed heights are 110t within the ecological potential of the area in question.	All	BLM	fx0011gb
163.	We have observed that well-rnanaged livestock grazing is an effective and sustairrable method for combating several of the most significant threats to sage grouse habitat including fuels reduction to mirrimize wild fires and to prevent or rlow invasive species and conifer proliferation. While the ESA does not provide for the cost of a mitigation strategy to preclude its implementation, funding to implement strategie,s is none the less rraturally limited. Our continued ability to serve a broad spectrum of multiple-use industries is crucial to maintaining their ability to provide beneficial habitat managerflent and their financial viability to implement appropriate mitigation ffieasure5. Mininrizing wild fires also protects our infrastructure from damage and reduces our need to mobilize drews and equipment to rehuild power lines irt areas which may be sage grouse habitat.	All	Both	fxc0006GB
164.	Sound scientific research indicates that grazirrg is beneficial to the Ereater sage-grouse and other flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires" (Launchbaugh er al.2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et aI.1994, Evans 1996). [t has also been used to control invasive weeds (Olson and Lacey 1994, Walker et at.1994).	All	Both	fxc0006GB
165.	Each potential vegetation state in Ecological Sitc Descl1ptions should include a rating of suitability for sage grouse habitat during each season, similar to Cagney et aL (2010).	All	BLM	fxc0011gb
166.	Vegetation and land tTeatments must include pre~ and post-treatment monitoring of both vegetation and sage grouse populations, These data are needed to determine the elTects of treatments, evaluatc their Success in meeting 111<lllagement goals, and improve suhsequent treatments and managcment decisions	All	BLM	fxc0011gb
167.	Ecological Site Descriptions are based on Range Site data, which provide production by specics (lhs/a.cre). However, land managers monitor vegetation using cover measurements. Ecological Site Descriptions must also include cover data.	All	BLM	fxc0011gb
168.	It has also been shown that increased use of meadows and riparian areas in mid-to late summer is common as herbaceous vegetation in upland habitat becomes desiccated. Potential for competition with Sage-Grouse young may be in proportion to the extent to which cattle select mesic/moist sites that are preferred foraging areas. Young birds seek out insects and	All	Both	rmc0024GB

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	succulent forbs in these habitats. Although the adult diet switches to forbs and insects in addition to sagebrush, developing young depend heavily upon insects for food. These habitats are critical brood-rearing and summer use areas in regions with low annual rainfall and during drought years.			
169.	Protect sage grouse spring, summer and fall ranges during periods of drought. Drought alone has been identi ied as a major factor contributing to the range-wide decline of sage grouse (Connelly and Braun 1997). Design adaptive management strategies to protect against the cumulative effects of grazing use on sage grouse forage and cover during drought. Livestock grazing of sagebrush ranges during years of unusually low precipitation and poor plant growth will cause an earlier than normal removal of grasses and forbs. This can have a serious impact on grouse dependent on forbs in that locality. Results suggest the timing and amount of moisture received were important to nest success...cool season grass growth during the preceding year (i.e., available as residual grass to nesting females) appeared to be important for overall greater sage grouse nesting success. The drought indicators from the National Climatic Data Center can give long term percent of normal precipitation forecasts that give forward looking projections of one, three, six and twelve months. Such information is critical to manage for sage grouse. The effects of low precipitation and drought are difficult for all wildlife and if grazing livestock are allowed in sage grouse habitat, the negative effects to sage grouse are well known. stocking at near-normal levels during periods of moderate to severe drought is probably the greatest cause of rangeland deterioration. Reduced stocking rates during drought, and for some time after drought, are necessary to minimize damage and hasten recovery of perennial vegetation.	All	Both	rmc0024GB
170.	Have quantifiable data collected that show there is enough herbaceous cover (at least 18cm under and around sagebrush. This cover is to be a condition of grazing on public land.	All	Both	rmc0024GB
171.	Use clear definitions of residual plant cover setting the standard by individual situation rather than one-size fits all for nesting habitat.	All	Both	rmc0032GB
172.	In some areas, the establishment of pinyon juniper in sagebrush areas is a natural progression. Is it right or natural for public land managers to restrict the establishment of pinyon juniper, a native species?	All	Both	rmc0035GB
173.	If pinyon juniper is restricted, will it later have a long term impact on other species (e.g., restricting raptor nesting habitat or reducing foraging lands?). The conservation of one species (e.g., sage grouse) should not have an impact on another species (e.g., raptors). These issues should be analyzed in the proposed EIS.	All	Both	rmc0035GB
174.	How many AECS include areas where Juniper Encroachment exists and how much acreage is now proposed for treatment in these areas?	All	Both	rmc0036GB
175.	What has been the actual cost ofthe SCS Juniper Management program in Oregon since 2002; and how many acres of Juniper have been treated on public and private land? What is the actual average cost/acre of the Juniper treatment in Oregon since 2002?	All	Both	rmc0036GB
176.	Excessive grazing in particular has dramatically altered the vegetation community of semi-arid habitats through the Great Basin, for very little economic value in the forage utilized, representing a gross failure by the BLM to roughly balance the marginal values of competing uses. As a former resident of Utah and New Mexico, I was astounded by the willingness of the BLM to strip vast areas of desert, sagebrush, and semi-arid grassland of their very thin vegetation cover for an extremely meager biomass volume of livestock feed, supplementing the diet of an extremely small number of cattle for a	All	Both	rmc0037RM, rmc0070GB

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	correspondingly minute number of ranchers. If the BLM is to uphold its mandate to provide an equitable and reasonable balance of values to the American people, it must protect these precious ecosystems and the Sage Grouse that lives among them, not strip them for the piddling bit of livestock-palatable biomass that provides their physical scaffolding.			
177.	Many permittees have voluntarily implemented adaptive grazing management strategies to encourage Sage-grouse Conservation on their allotments and private lands, and many of the recent permit renewals have included such measures. The Board requests that the BLM make every effort to work collaboratively with permittees to recognize and use grazing as a tool to enhance Sage-grouse conservation. For example, the use of grazing to reduce fine fuel loads and noxious species could greatly enhance efforts related to "integrated vegetation management" and "wildfire suppression and fuels management." Also, prescribed grazing can be used effectively to improve or enhance Sage-grouse habitat as noted in the Report.	All	Both	rmc0050GB
178.	The Board is supportive of "implementing management actions after land health and habitat evaluations." However, managing" ... for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve sage-grouse seasonal habitat objectives" is not practical. Historic management practices and landscape alterations, coupled with the introduction of noxious weeds and catastrophic wildfire have effectively eliminated the "reference state" condition. The focus should be on maintaining vegetative resilience and resistance by maintaining critical ecological processes identified by the reference state, and avoiding the crossing of ecological thresholds. Every effort should be made to achieve this including the utilization of the best available indigenous science and knowledge combined with the use of all management tools, including grazing, herbicides, mechanical treatments, and nonnative adapted plant materials.	All	Both	rmc0050GB
179.	A study needs to be completed which will confirm or discredit those advocating the use of livestock for the purpose of preventing plant stagnation or opening up canape cover for the benefit of wildlife.	All	Both	rmc0054GB
180.	Before new policy is adopted for the management of sage grouse, studies need to be completed which will determine for certain whether leaving large amounts of standing grass within management areas is detrimental to sage grouse or not.	All	Both	rmc0054GB
181.	Sage Grouse survival depends on some degree of removal of vegetative material. Green shoots that are both palatable and nutritious are necessary for a portion of the year. Survival also depends on sufficient habitat to nest in and sufficient habitat to survive the winter. Managed grazing by domestic cattle and sheep has provided these needs.	All	Both	rmc0057GB
182.	The Meeker/White River and Parachute Piceance/Roan populations (Colorado Plateau MZ) are in the Uintah-Piceance geologic basin. These populations are small and isolated, and are threatened by demographic, genetic and environmental stochasticity due to small size and isolation. In addition, these populations are threatened by a suite of deterministic threats, including: housing and energy development, predation, disease, and conifer invasion. Based on projected habitat impacts (particularly energy development) under current management prescriptions, the FWS believes that all of the populations in the Colorado Plateau MZ will be reduced in size and isolated in the future.	CO	BLM	emc0070RM
183.	The BLM should consider a 'conservation alternative' that: - Includes conservation measures recommended by the NTT Report, with improvements, including, but not limited to the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with addition of further conservation	CO	BLM	emc0070RM

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	measures, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,31 thus negating the value of designated priority habitats. Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT.			
184.	CPW recommends that the USFS work with allotment permittees to address any identified grazing management issues sage-grouse habitat as well as provide for deferment when vegetation restoration projects are in the early stages of establishment.	CO	USFS	emc0072RM
185.	(One of the most important NTT recommendations for Routt NF) "Do not reduce sagebrush canopy cover to less than 15% ". Unless a fuels management objective requires additional reduction in sagebrush cover to meet strategic protection of priority sage-grouse habitat and conserve habitat quality for the species." Id. at 26.	CO	USFS	emc0175RM
186.	iv. The BLM and FS should analyze an alternative that provides more protection than that afforded by implementation of the National Technical Team's Recommendations. The BLM and FS should consider an alternative that: - Includes conservation measures recommended by the NTT Report. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT. - Incorporates improvements to the NTT's recommendations, including the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with improvements, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,10 thus negating the value of designated priority habitats. o Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions.	East	Both	emc0089RM
187.	So called "habitat improvement" projects, such as mechanical sagebrush treatments and prescribed fire, can be detrimental to greater sage-grouse and other sagebrush obligate species. Scientifically defensible research is needed to determine which activities are beneficial. This information should be maintained in a single federal database.	East	Both	emc0089RM
188.	Employ Best Practices for Juniper Management: BLM should identify a clear benefit to sage-grouse and a restoration plan with quantifiable objectives before practicing juniper removal. Planning should include careful post-removal management to prevent invasion by weeds and to establish a native sagebrush community that will support sage-grouse.	GB	Both	emc0355GB

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Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
189.	Employ Restoration Planning: Resource management plans should incorporate alternatives that focus on restoring and maintaining native sagebrush and bunchgrass communities necessary for sage-grouse nesting and brooding.	GB	Both	emc0355GB
190.	Management of wild and prescribed fires is considered an important issue in maintaining vital sagebrush habitat (Crawford et al., 2004).25 Historically, fire was the primary natural disturbance in sagebrush dominated ecosystems where sage-grouse evolved (Ibid.). The suppression of fire is believed to have changed historic sagebrush systems, encouraged the spread of invasive vegetation, and contributed to the expansion of Western Juniper (Juniperus occidentalis)(Miller and Rose, 1999).26 Western Juniper expansion has changed historic sagebrush steppe habitat to predominately juniper woodland in many areas of the Great Basin, primarily in Oregon (Rowland, et al. 2010). Since 1930, juniper woodlands in Eastern Oregon expanded from 600,000 ha to over 2.6 million ha, resulting in fragmentation and loss of sagebrush habitat (Ibid.). As a result of juniper expansion, BLM has begun to take on projects to control the spread of woodlands into historic sagebrush systems. Availability of sagebrush at local and landscape scales is a requirement for Greater sage-grouse persistence (Johnson et al., 2009). All juniper treatments (including manual removal and prescribed fire) should be undertaken to minimize the spread of invasives, retain the maximum amount of sagebrush and associated native forbs and grasses. A few best practices, which have been used by BLM in Oregon to manage juniper through prescribed burns, include: 27 - Resting treated areas from grazing for a minimum of two grazing seasons - Closely monitoring grazing impacts after livestock are returned to allotments - Scheduling treatments to avoid breeding and nesting periods We encourage BLM to incorporate best practices and ensure that all steps are taken after burns for native vegetation to return. In addition, we recommend a vegetation monitoring program be implemented which includes control plots to exclude livestock grazing so that additional best practices can be established in a scientifically defensible manner. Habitat improvement projects frequently lack rigorous monitoring and evaluation plans, which undermines the ability of land managers and the public to quantify the benefits of management actions (Whisenant, 1999). Summary: BLM should identify a clear benefit to sage-grouse and a restoration plan with quantifiable objectives before practicing juniper removal. Planning should include careful post-removal management to prevent invasion by weeds and to establish a native sagebrush community that will support sage-grouse.	GB	Both	emc0355GB
191.	It is important that vegetative seeding facilitated by BLM does not harm sage-grouse habitat. According to the Technical Team, BLM should "Evaluate the role of existing seedings that are currently composed of primarily introduced perennial grasses in and adjacent to priority sage-grouse habitats to determine if they should be restored to sagebrush or habitat of higher quality for sage-grouse." (Page 17) Summary: Resource management plans should incorporate alternatives that focus on restoring and maintaining native sagebrush and bunchgrass communities necessary for sage-grouse nesting and brooding.	GB	Both	emc0355GB
192.	The BLM needs to be careful about using the term "dominance or dominated" when discussing sagebrush abundance or presence on the landscape. For example, on Page 6 of the December 21, 2011 report about National Greater Sage-Grouse Conservation Measures, the language infers that sagebrush dominated sites best meet the needs of sage-grouse. We urge caution when discussing the concept of ecological dominance because dominance concepts often are used interchangeably with abundance and the two are not the same. When sagebrush becomes the ecologically dominant species on a landscape that means it drives plant succession processes and outcomes, particularly following the inevitable disturbance from fire.	GB	Both	rmc0067GB

Table C-8.A
Comments Related to General Vegetation Management

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	The outcome, particularly on sites with less than 12 inches of annual precipitation, is less perennial grass in the herbaceous understory, which facilitates an increase in cheatgrass, the single most significant threat to sage-grouse in the Great Basin region. Sagebrush should be present across much of the landscape, but more (higher density) on all parts of the landscape will result in adverse unintended and undesired outcomes.			
193.	Rangeland seedings established for Range Improvement objectives (largely 1950'2-70's) should remain as seedings and be managed to maintain high forage production, which results in the exclusion of invasive annual grasses and reduced spring use on adjacent native range. An evaluation of the Vale Project in southeastern Oregon clearly documented the success and of these seedings for overall rangeland management. Fire rehab seedings should be managed to initially establish a perennial grass state that largely excludes cheatgrass, but is capable of following successional pathways toward a perennial grass/shrub and shrub/perennial grass states that are resilient to the next large scale disturbance. Species selection for fire rehab seedings should be based upon the probability the species seeded will germinate and establish the first growing season and competitively exclude cheatgrass. On more arid sites this will mean the exclusive use of exotic perennial grasses instead of native grasses.	GB	Both	rmc0076gb
194.	The Dillion Local Working Group identified 5 key issues in the area: 4. Conifer invasion	IDMT	Both	rmc0028GB
195.	Actions that reduce or minimize sage brush habitat include: -Eliminating sagebrush (including burning, plowing, mowing, or use of herbicides) as part of efforts to promote grass growth, or reduce fuels. -Wildfire	IDMT	Both	rmc0028GB
196.	(identified as a priority issue in the Dillion Area) - conifer expansion	IDMT	Both	rmc0028GB
197.	There is no evidence that cattle have any impact on sagegrouse, either positive or negative. However, there is plenty of evidence that ranching has a strong positive impact on sagegrouse. Ranches need to be relatively large and usually in native vegetation. This protects against habitat fragmentation and the destruction of sagebrush for fields or lawns. Ranchers need vegetation and will control fires to some extent. Hot, late, uncontrolled fires will destroy large areas of big sagebrush, which takes over a century to recover from a burn of this kind. Ranches tend to have some degree of predator control, and predators are the largest negative impact on sagegrouse, following sagebrush destruction. Areas with healthy sagegrouse populations tend to have ranches, areas that have lost their ranches have also lost their sagegrouse. It is easy and popular to protect sagegrouse from cattle, but the cattle don't harm the sagegrouse. If you remove the cattle, you also remove the ranches, which are important to the sagegrouse. Sagegrouse can be protected into extinction just like rare orchids and desert pupfish.	MT-RM	Both	emc0023RM
198.	The beneficial effects of predator control must be addressed in sage-grouse management strategies. Specifically, raven control could be beneficial to nest and chick survival. Nevada's raven population has grown dramatically over the past 25 years and it has been stated we currently have extremely drastic increase in ravens over historic levels.	NVCA	Both	emc0204GB
199.	The Nevada Wilderness Project respectfully requests that you address the impacts to sage--grouse and sage---grouse habitat caused by feral horses, including removal of vegetational cover necessary for nesting and brood---rearing, changes to vegetational composition that results from feral horse use, horse impacts to springs and other important free water sources utilized by sage-grouse, possible disturbance caused by feral horses during the nesting period, infrastructure used to mitigate horse impacts (e.g., fences) and how it may negatively affect sage-grouse, any connection to West Nile Virus as	NVCA	Both	emc0243GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	that disease is recognized as affecting both horses and sage-grouse, and the potential for feral horse management actions to negatively affect sage-grouse and sage-grouse habitat.			
200.	What likely could be done to help sage grouse would be to keep cattle or sheep in areas suitable for sage grouse using good range management so grass and forbs would not be over used. Riparian areas should be carefully used so green grass would be there and the riparian areas would be more healthy for their own sake. Grass is healthier when cut or grazed	NVCA	Both	emc0253GB
201.	What likely could be done to help sage grouse would be to keep cattle or sheep in areas suitable for sage grouse using good range management so grass and forbs would not be over used. Riparian areas should be carefully used so green grass would be there and the riparian areas would be more healthy for their own sake. Grass is healthier when cut or grazed.	NVCA	Both	emc0253GB
202.	Pacific Rim compared the NDOW habitat map with field data for the Hog Ranch project area. Our comparison clearly demonstrates that both the NDOW and the derivative BLM-USFS maps are inaccurate and unreliable. The habitat categories shown on the NDOW map bear no resemblance whatsoever at all to the conditions on the ground. The attached map of the Hog Ranch area shows an enlargement of the NDOW Habitat Categorization Map for the Hog Ranch project area and superimposes the mining-related, on-theground features on the NDOW habitat map. As shown on the Hog Ranch map, the NDOW Habitat Characterization Map classifies this previously mined area as having significant and essential sagegrouse habitat. However, knowledge of the actual field conditions at Hog Ranch clearly reveals this classification is wrong. The Hog Ranch area is not an area with high-value sage grouse habitat. In fact, the substantial amount of previously disturbed land that is shown on the Hog Ranch map provides very limited sage-grouse habitat. Thus it is readily evident from the Hog Ranch map that the NDOW map does not accurately categorize the habitat characteristics of the mined and disturbed areas at Hog Ranch. Previous operators reclaimed the Hog Ranch project area in the late 1990s and early 2000s. Although there is vegetation growing in the reclaimed areas it is sparse in many places. Moreover, throughout the reclaimed areas, the vegetation that is growing is not the ideal vegetation species composition that comprises priority sage-grouse habitat (e.g., a sagebrush canopy with grassland and forbs understory).	NVCA	Both	emc0287GB
203.	The NDOW map shows the southern portion of the Hog Ranch project area in yellow which is NDOW Habitat Category No. 1 - "Essential/Irreplaceable Habitat." As can be seen from the Hog Ranch map, in reality, this is an area with extensive disturbance from previous exploration drilling and mining. A field examination readily confirms that this area is not priority sage-grouse habitat because it does not have the right kind of vegetation and is heavily disturbed. Thus the NDOW habitat categorization map for this area is incorrect.	NVCA	Both	emc0287GB
204.	The NDOW map shows much of the Hog Ranch project area in green, thus classifying it as Habitat Category No. 3 - "Habitat of Moderate Importance." There is very little sagebrush growing on the reclaimed mine site; most of the area is sparsely revegetated. Thus the designation of most of the reclaimed mine site as "Habitat of Moderate Importance" does not fit the description of this NDOW habitat category (see NDOW's white paper on the agency's website1). Thus the NDOW habitat categorization map for this portion of the project area is incorrect.	NVCA	Both	emc0287GB
205.	Grasses Dominate the Revegetated Area and are used Extensively for Grazing: Due to the predominance of grass species in the BLM-approved reclamation seed mix used to revegetate the mine site, grass is the dominant plant species growing on the reclaimed areas. These areas are highly utilized for grazing by cattle, horses and antelope. In addition, the private sections cover water sources and pasture lands heavily impacted by these larger animals. Large areas of cheat grass are	NVCA	Both	emc0287GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	locally present, as well.			
206.	In the NTT document, livestock grazing is considered to be a diffuse disturbance (pressure is exerted over broad spatial or temporal scales). Livestock grazing, as well as wild horse and burro activity can greatly affect nest success on any ground-nesting bird as well as decimate any viable vegetation in the grazing area. Wild horse numbers have increased exponentially in the Rochester area and no gatherings have occurred to decrease population size. Since wild horses have different grazing patterns then cattle the magnitude of grazing increases across the entire landscape in the Rochester area. Damage to vegetation communities (i.e. reduction of grass, shrub, and forb cover and increases in unpalatable forbs and exotic plants as well as complete decimation of any vegetation community) is highly visible in the Limerick and Rochester canyon areas. If any mitigation efforts were made in or adjacent to Rochester mine's project area wild horses and cattle would have to be fenced out for any type of habitat restoration or sage grouse re-introduction to have a chance.	NVCA	Both	emc0302GB
207.	In Nevada, range surveys were done in recent decades. Foresters are questioning the conclusions of many of the soils surveys. There has been a strong bias in research done in Nevada towards a "range" perspective, and not towards a forestry perspective, and this is true in the soil surveys, too. Historical surveyor records contradict soil surveys -showing "Pine Nut Forest" and other vegetative descriptors on areas claimed by agencies relying on soils surveys to be sagebrush habitats. For example, in association with the Ely-Mount Wilson Vegetation Deforestation Project, WWP reviewed historical surveyor records from the 1870s that clearly showed "Pine Nut Forest" and large trees on lands claimed to be (Fite Ely-Mount Wilson Prject Historical Surveyor Records Searches. Recent papers contradict soil survey conclusion related to widespread pinyon-juniper "invasions." See Lanner and Frazier 2012. See also Lanner the Pinyon Pine, and Skip Ritter, forester pers. Comm. To Fite.	NVCA	Both	emc0411GB
208.	Many areas, including significant portions of the Humboldt-Toiyabe Forest, still do not even have soil surveys.	NVCA	USFS	emc0411GB
209.	Regarding this statement: These areas include breeding habitat (lek sites and nesting habitat), brood-rearing habitat, winter range, and important movement corridors. PPH primarily consists of sagebrush, but may also include riparian communities, perennial grasslands, agriculturally-developed land, and restored habitat, including recovering burned areas. We request that NDOW, BLM and the Forest provide more detailed mapping that identifies all of the following seasonal habitats as well as sagebrush, riparian, perennial grasslands native must be identified separately from non-native, ag-developed land, and restored habitat successfully restored lands must be separated from treated lands, weedlands that have resulted from fuels treatments, etc. As we describe throughout just because an agency spent funds on projects does not mean that the claimed project benefits such as restoration or even successful rehab have actually been achieved on the ground. It is critical to identify areas of crested wheatgrass for removal, inter-seeding, etc. There is typically less suitable nesting cover, and crested wheatgrass limits forb and other native plant recovery. It is also very important to identify these areas to prevent federal agencies from proposing to mow or purge sagebrush when sagebrush has moved back in to some degree. Unfortunately, killing sagebrush in seedings, rather than acting to restore seedings, or at a minimum inter-seed seedings with less sagebrush has been proposed by Ely BLM and other offices in Nevada that seek to relentlessly alter, manipulate and destroy sagebrush and other woody vegetation communities.	NVCA	Both	emc0411GB
210.	We are also concerned about targeting pinyon-juniper without an understanding of historical deforestation, and the fact	NVCA	Both	emc0411GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	that in many areas, pinyon-juniper are in reality the climax vegetation on a site. It appears much easier for agencies to promote expensive tree killing projects, rather than address the extensive degradation caused by livestock grazing, roading, or other disturbances throughout Nevada's sagebrush habitats.			
211.	As previously described, it is from our observations of BLM's claimed "fuelbreaks" and vegetation treatments conducted across Nevada (Austin Fuelbreaks, Elko Owyhee Fuelbreaks, Ely Fuelbreak weedlands of Cherry Creek and Spring Valley treatments, etc.) that removal of shrub protective cover, or tree protective cover, results in hotter, drier sites that become dominated by cheatgrass several years following "treatment". There is typically a 4-6 year lag period in sites that previously had little cheatgrass before being altered, which is longer than agencies typically monitor their "treatments". So the cheatgrass is showing up after BLM quits monitoring.	NVCA	Both	emc0411GB
212.	Establishing an across-the-board herbaceous cover requirement will eliminate the ability of a manager to Implement practices appropriate to some plant communities. In Nevada, some plant communities don't yield 7 inches of herbaceous growth and yet have a thriving sage grouse community. Again, managing herbaceous height for a single species Is shortsighted and inappropriate for our ecosystem. An herbaceous growth requirement may also increase fine fuel loads and more importantly. Fuel continuity, resulting In continued large scale fires. The sage grouse habitat loss we have experienced has nothing to do with grazing, invasive species, off-highway vehicle use, or even mineral development - wildfires have decimated more habitat in our area than the other uses combined. By removing our ability to manage for site-specific herbaceous material, our ability to minimize the effects of these catastrophic wildfires is eliminated. There should be a balance between sage grouse cover needs and fine fuel loads.	NVCA	Both	fxc0010GB
213.	Establishing an across-the-board herbaceous cover requirement will eliminate the ability of a manager to Implement practices appropriate to some plant communities. In Nevada, some plant communities don't yield 7 inches of herbaceous growth and yet have a thriving sage grouse community. Again, managing herbaceous height for a single species Is shortsighted and inappropriate for our ecosystem.An herbaceous growth requirement may also increase fine fuel loads and more importantly. Fuel continuity, resulting In continued large scale fires. The sage grouse habitat loss we have experienced has nothing to do with grazing, invasive species, off-highway vehicle use, or even mineral development - wildfires have decimated more habitat in our area than the other uses combined. By removing our ability to manage for site-specific herbaceous material, our ability to minimize the effects of these catastrophic wildfires is eliminated. There should be a balance between sage grouse cover needs and fine fuel loads.	NVCA	Both	fxc0010gb
214.	BLM needs to identify the scale of areas where resource concerns can be identified and confirmed through a well-developed empirical inventory. The BLM assessments using Standards of Rangeland Health has limitations in the elements that can be identified as a cause and effects impact to resource condition and lacks sufficient elements to serve as an inventory. The SRH methods are qualitative and lack rigorous sampling procedures to provide a credible study of the BLM plant community landscapes. The EA should carefully look at the issue of making meaningful provisions in the plan for an up-to-date inventory of the acres of different plant communities. Average production and appropriate height to weight relationship of the forb and grass plants. The District inventories in Oregon have not been up-dated in over 30 years and the older work will not provide a credible roadmap about the landscape. This work and information should be referred to the Range programs where education, training, and experience with livestock grazing issues will compliment the work that	OR	Both	emc0136GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	needs to be done.			
215.	The scales at which the grazing alternatives are developed for management of vegetation communities need to be considered and carefully scrutinized. Wyoming big sage communities and other sagebrush species vary in ecological potential due to moisture and soil differences in Oregon and the western regions. Allotments and pastures arc a mosaic of sites located at different elevations on varying ecological surfaces. One size fits all prescriptions do not work and consideration of the variability of different areas should be identified.	OR	Both	emc0136GB
216.	Employ Best Practices for Juniper Management: BLM should identify a clear benefit to sage-grouse and a restoration plan with quantifiable objectives before practicing juniper removal. Planning should include careful post-removal management to prevent invasion by weeds and to establish a native sagebrush community that will support sage-grouse.	OR	Both	emc0385GB
217.	Employ Restoration Planning: Resource management plans should incorporate alternatives that focus on restoring and maintaining native sagebrush and bunchgrass communities necessary for sage-grouse nesting and brooding.	OR	Both	emc0385GB
218.	What will be the impacts or effects of the proposed juniper Encroachment management plan on Existing valued Visual and Aesthetic qualities and Management Objectives in regions now defined within Areas of Environmental Concern (AECS) in the Vale, Lakeview and BLM Districts?	OR	Both	rmc0036GB
219.	What is the total number of AMU's now allotted within all the proposed "juniper Treatment" areas in eastern Oregon?	OR	Both	rmc0036GB
220.	The ODFW should determine what effect decreased sight lines in treated areas have on predation rates in Sage Grouse habitat.	OR	Both	rmc0036GB
221.	The ODFW must justify in their proposed juniper Management strategy, answering the question: Why is a standing Juniper Tree in a Juniper Encroachment Area not good for Sage Grouse; but at the same time a dead juniper tree cut off at the stump and left lying on the ground in a treated Juniper Encroachment area, is somehow beneficial to the Sage Grouse, as proposed in EIS Management Recommendations?	OR	Both	rmc0036GB
222.	The ODFW EIS does not provide any evidence that "Juniper Encroachment" is anything more than natural "Faunal Succession" and a recovery response in the Great Basin to improved grazing practices and land use changes over the last 80 years. If such evidence exists the data and conclusions should be presented.	OR	Both	rmc0036GB
223.	The ODFW EIS as written does not Demonstrate with "best science" that the Juniper Management Program of the SCS has been measurably successful at producing a "Net Benefit" to the Sage Grouse Population. Increasing the Sage Grouse population or effectively enhancing Sage Grouse use of rehabilitated terrain in Oregon or elsewhere, since the SCS program inception in 2002; must be demonstrated by the applicant before adoption of the proposed Juniper Management plan. The EIS must address this diffincey. On Page 3, the EIS states "The outcomes of each conservation action suggested must be evaluated for their effectiveness." Because the EIS does not provide any concrete evidence that Juniper Management as proposed has worked over the 2002-2010 period. It does not seem that the spirit of the words in written into the EIS have been followed to date.	OR	Both	rmc0036GB
224.	Any EIS or SEIS must also explicitly recognize the following points:The extensive encroachment of pinion-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much of	OR	Both	rmc0078GB

Table C-8.A
Comments Related to General Vegetation Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	the West.			
225.	The sage grouse habitat in our county is in need of some attention. There have been too many years of fire suppression and not enough brush control to create the type of landscape needed by sage grouse populations (too tall of brush and too dense of canopy). These activities, or lack of activities, have contributed too many places of juniper/pinion encroachment that are detrimental to sage grouse habitat. Something needs to be done to correct these issues.	UT	Both	emc0295GB
226.	Emery County is concerned that the National Strategy is focused on "sagebrush habitat", and "sagebrush conservation", and the development of "new conservation measures" for sagebrush conservation. Such a broad focus on sagebrush conservation, rather than Greater Sage-grouse conservation, has the potential for new conservation measures to affect the management of numerous public land uses, and areas of Emery County, which are totally unrelated to Greater Sage-grouse. Emery County believes that the National Strategy should specifically address the conservation of Greater Sage-grouse, as the title of the project implies.	UT	Both	rmc0073GB
227.	Emery County is firm in its position that the entire planning process, at all levels, must focus on issues and needs relevant to conservation of the Greater Sage-grouse and sagebrush habitat which is specifically related to the species, rather than the broader sagebrush vegetationcommunity issues.	UT	Both	rmc0073GB
228.	Factors such as vegetation management, fire management, conflicting wildlife management, predation, subdivision and infrastructure development, and invasive plants are a higher priority in the Upper Snake River Basin Conservation Area (USRBCA) and include large areas that could be affected by project actions.	WY	USFS	emc0144RM

Table C-8.B
Comments Related to Weeds/Invasive Species

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	We would like to see the BLM take more initiative on controlling noxious weeds, especially Leafy Spurge, on BLM ground within Sage Grouse habitat.	All	Both	cfc0001
2.	Encroachments of forbs and bushes (Junipers, etc.) that could take over sage grouse habitat should be included in the plan and an action to not allow it to happen.	All	Both	cfc0004RM
3.	I agree with the NTC recommendation about not controlling big sage in precip. Ares less than 12". In fact, I would recommend that fire not be used in less than 15" precip. Zones. Too much chance of cheatgrass invasion in low precip. Areas.	All	Both	cfc0017RM
4.	When doing noxious weed control who wins sage grouse or weeds.	All	Both	cfc0020RM
5.	Looming on the horizon is the very real threat of invasive species. Much is made of cheatgrass and juniper encroachment but both are runners up to medusahead rye. The Idaho Fish and Game Department conducted a study with chuckers in three plots. One had a food supply of crested wheatheads, another with cheatgrass heads and the third with medusa head rye heads. The first two groups thrived and the third starved. The study concluded that medusahead rye had no protein value in its dry seed ripe condition. An official involved predicted that, unchecked, those areas infested with medusahead would become a biological desert within twenty years.	All	Both	cfc0030GB
6.	At this writing, Oregon is under a court ordered injunction limiting use of herbicides on public lands. Currently Oregon BLM is requesting public comment on the ban with the goal of getting it lifted. In the meantime, the state will continue on as a seed source for invasive species.	All	Both	cfc0030GB
7.	I believe the solution to resource issues and working toward resolving them can be found at home. Jordan Valley hosts what is known as the cooperative weed management area (CWMA). It encompasses roughly five million acres; four in Malheur County, Oregon and one in Owyhee County, Idaho. Coordinator, Eric Morrison, says, "What makes this group work is it is land-owner driven ." Representatives from the ranching community, irrigation district, state and federal agencies, counties, and environmental groups work together for the common goal of conducting a meaningful weed control program.	All	Both	cfc0030GB
8.	Stop and eliminate the use of crested wheat. This is a non-native plant.	All	Both	cfc0058GB
9.	The plan must address the impact of noxious weeds on sage-grouse habitat and strive to get the weed conjunction lifted and the vegetation mgmt EIS approved.	All	Both	cfc0070GB
10.	Also, stop planting crested wheatgrass and other non-native plants as part of fire rehabilitation.	All	Both	emc0009RM
11.	People who ride the range moving cattle or fixing fence have more opportunity to find noxious weed infestations, which reduces the amount of sage grouse habitat lost to non-native invasive plants. If economic and political forces remove riders from an allotment, the habitat becomes less resistant to invasive plants.	All	Both	emc0013RM
12.	With the introduction of non-native grasses and species, you may be best to designate several large blocks of land specifically and totally to the sage grouse.	All	Both	emc0017
13.	In addition to energy development and disease, sagebrush-steppe habitat quality may be impacted by grazing practices, invasive species and resulting changes in the frequency and severity of fires.	All	Both	emc0034RM
14.	Decreases in the quality of habitat may have direct impacts on greater sage-grouse populations. WWF encourages the BLM to address the potential impacts of climate change on the spread of invasive plants, particularly cheatgrass (Bromus tectorum),	All	BLM	emc0034RM

Table C-8.B
Comments Related to Weeds/Invasive Species

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	which may highly alter the quality of habitat by outcompeting native grasses and forbs and causing increased frequency and severity of wildfires, which are detrimental to fire-intolerant sagebrush species.			
15.	How has the spread of weeds and other invasive species affected sage grouse and its habitat? 1) What factors promote the spread of the various exotic species? 2) What ecological changes/problems do these invasive species impose on sage grouse?	All	Both	emc0041GB
16.	Your graph shows the invasive species is the greatest threat but the direction to fix things is always more "takings" from the tax payers and yet the other side of the government stops the use of a weed spray that will help control cheat grass which is one of the sage grouse habitat's worse enemies. How about going after the EPA and getting in their pocket and not ours. In other words push to have all the governmental agencies play in same sand box together.	All	Both	emc0045GB
17.	Cheatgrass (Bromus tectrorum) will often occupy sites following disturbance, especially burning. Repeated burning or burning in late summer favors cheatgrass invasion and may be a major cause of the expansion of this species . The ultimate result may be a loss of the sage grouse population because of longterm conversion of sagebrush habitat to rangeland dominated by an annual exotic grass. Historic and scientific evidence indicates that livestock grazing did not increase the distribution of sagebrush but markedly reduced the herbaceous under story over relatively large areas and increased sagebrush density in some areas	All	Both	emc0057GB
18.	Noxious weeds are a huge problem and need attention in this scoping process. The federal and state land management agencies certainly have not adequately addressed this threat in proportion to their ownership of lands in the west. Everyone is responsible for control, but the private landowner and federal lessee is critical in weed control. It is naïve to think we can accomplish our task with herbicides alone. We must use biological control and grazing when appropriate and realistic. The landowner and his county government contemporaries can get funding to control weeds on intermingled lands that have little federal funding. The stewardship responsibility of land ownership is huge and the agencies are using the management of the lessee to accomplish this. If we regulate the lessee off the land, who will assume the agencies responsibilities, especially for weed control?	All	Both	emc0070GB
19.	Livestock-free portions of our Greater Sage-Grouse range may be necessary to ensure viable populations are maintained in otherwise disturbed landscapes, particularly in conservation priority (core) areas. We believe that closing these areas to livestock grazing through the permanent retirement of existing grazing permits should protect them from the risk of overgrazing, greatly reduce the risk of invasion by undesirable vegetation (invasive plants), and enable federal land managers to compare these lands to other grazed areas, enabling them to better evaluate the effects of livestock grazing on these sagebrush ecosystems and Greater Sage-Grouse populations.	All	Both	emc0074GB
20.	Invasive plant species are becoming more widespread throughout our federal public lands as a result of disturbances from livestock grazing, livestock feeding operations, roads and energy developments, increased traffic on roads and trails, and other land uses. While there are numerous invasive species that may occur across the sagebrush steppe, those most important over large areas include cheatgrass, juniper and pinyon pine. Control or elimination of these exotic species should have the highest priority, particularly in conservation priority (core) areas for Greater Sage-Grouse.	All	Both	emc0074GB
21.	Recommendation # 6 - We recommend that control or elimination of cheatgrass, juniper, and pinyon pine infestations have the highest priority among management actions on our federal public lands, particularly in conservation priority (core) areas for Greater Sage-Grouse.	All	Both	emc0074GB

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22.	ISSUE: The proposed Conservation Measures fail to address pinyon-juniper (woodland) encroachment into sagebrush / sage grouse habitat as an important issue needing specific recommendations for the Great Basin and Colorado Plateau physiographic areas. Woodland encroachment is one of the most intractable problems facing sage grouse habitat management in the Great Basin and Colorado Plateau. There is an extensive body of research and research publications concerning the history of woodlands in the Great Basin and Colorado Plateau physiographic areas. Climate / carbon cycle changes, interruption of natural fire cycles, changes in class of grazing livestock and historic recovery of fuel wood areas have all contributed to an increase in the stocking rate and acreage dominated by woodlands. Grey science points to there having been higher, normally fluctuating numbers of sage grouse when woodland areas were being heavily harvested for fuel wood. The problems for water sources and understory vegetation in encroaching woodland areas has been researched and documented for many years. Woodland encroachment into sage grouse nesting / brooding (riparian area) habitat and connective habitat continues to make these areas less than ideal to unusable for sage grouse. Although USFS and BLM to a lesser extent have programs for woodland management, i.e. harvesting etc., treatment is expensive and fraught with regulation on larger areas. The LUP amendments need to include woodland treatments, not just scattered trees in fuels reduction projects.	All	Both	emc0083GB
23.	In many parts of the western United States, fire and non-native, invasive species are primary threats to sage-grouse habitat. Consequently, the BLM and FS's efforts to develop sage-grouse conservation measures should focus on addressing these causes of habitat diminution. For example, the BLM should consider the extent to which fuels management programs and rehabilitation of fire-impacted areas may provide benefits for sage-grouse habitat. In addition, modification of suppression and fire management strategies and practices should be considered.	All	Both	emc0084GB
24.	Although the wildfire effects of climate change from anthropogenic carbon emissions could not be directly projected, USFWS also determined that sage-grouse habitat degradation would accelerate due to encroachment from nonnative invasive species that are highly responsive to increased carbon concentrations.	All	Both	emc0110GB
25.	Arter reviewing the food habits of pre-laying hens and chicks it appears there are a number of introduced, invasive species plants that are heavil}' Ilsed during the sage grouse life stages. Vegetation management objectives, including objectives for managing noxious weeds and invasive species (i ncluding identifi cation of desired future condition for specific areas), needs to focus on how preferred species arc treated whether they arc invasive or native (sec Torell et al. 2002 reference below).	All	Both	emc0136GB
26.	Noxious Weeds. Noxious weeds are recognized within the sage grouse areas ofIron County as a serious problem by the Iron County Weed Department, BLM, and USFS, and can have negative impacts on sage grouse. Iron County maintains records of the location, extent, and severity of weed establishment, and actively works to control the spread and establishment of weeds. In January 1996, the BLM published Partners Against Weeds (PAW), an action plan for the Weed Management program in the BLM. The PAW plan lists seven goals, the first being to develop a prevention and early detection program. The PAW recommends developing and enforcing a policy to "ensure seeds, seed mixtures, hays, grains and straws are free of weed seed" as a prevention and detection strategy. Utah's BLM Resource Advisory Council developed a guideline requiring certified weed free forage to be used on BLM lands by anyone having the need to take forage with them when using BLM public lands. Both the Utah State BLM Director and the Secretary of the Interior approved the guidelines in 1997. Since 2002, users of all federal lands and trust lands in Utah are required to use only certified noxious weed –free hay, straw, or mulch. The USFS is also	All	Both	emc0142GB

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	committed to a campaign against the spread of invasive species. Iron County encourages that the planning strategy recognizes the problems associated with sage grouse and noxious weeds, and adopt the seven goals in the PAW.			
27.	Study the effects of noxious weeds encroachment inot sage-grouse habitat.	All	Both	emc0153GB
28.	After reviewing some of the food habits of pre---laying hens and chicks it appears there are a number of introduced, invasive species plants that are heavily used during the sage grouse life stages. Vegetation management objectives, including objectives for managing noxious weeds and invasive species (including identification of desired future condition for specific areas), needs to focus on how preferred species are treated whether they are invasive or native (see Torell et al. 2002 reference below).	All	Both	emc0159GB
29.	Pinion/Juniper encroachment and decadent sage brush needs to be treated. In the past 10 years, in my area the BLM has completed around 10,000 acres of pinion/juniper encroached rangeland with hand cutting or bull hogging the P/J. These efforts are excellent and noteworthy. Hand cutting has been fairly effective and low cost, but bull hogging (mulching of standing trees) is extremely costly, $300-500/acre. These high cost treatments would never be conducted on adjoining private lands because they do not provide a cost effective return	All	Both	emc0165GB
30.	After reviewing some of the food habits of pre---laying hens and chicks it appears there are a number of introduced, invasive species plants that are heavily used during the sage grouse life stages. Vegetation management objectives, including objectives for managing noxious weeds and invasive species (including identification of desired future condition for specific areas), needs to focus on how preferred species are treated whether they are invasive or native (see Torell et al. 2002 reference below).	All	Both	emc0179GB
31.	After reviewing some of the food habits of pre---laying hens and chicks it appears there are a number of introduced, invasive species plants that are heavily used during the sage grouse life stages. Vegetation management objectives, including objectives for managing noxious weeds and invasive species (including identification of desired future condition for specific areas), needs to focus on how preferred species are treated whether they are invasive or native (see Torell et al. 2002 reference below).	All	Both	emc0179GB
32.	The extensive encroachment of pinyon-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much of the West. The proposed range-wide guidelines do not recognize the variability of issues across the west and do not focus on or prioritize specific issues at the needed scale.	All	Both	emc0202GB
33.	After reviewing some of the food habits of pre---laying hens and chicks it appears there are a number of introduced, invasive species plants that are heavily used during the sage grouse life stages. Vegetation management objectives, including objectives for managing noxious weeds and invasive species (including identification of desired future condition for specific areas), needs to focus on how preferred species are treated whether they are invasive or native (see Torell et al. 2002 reference below).	All	Both	emc0209GB
34.	4. Carefully consider the juniper mastication work performed in Owyhee County as a preferred alternative for controlling invasive juniper.	All	Both	emc0212GB
35.	the extensive encroachment of pinion-juniper into sagebrush sites, coupled with vast expanses of decadent single aged sagebrush communities has drastically decreased productive habitat for nesting and brood rearing sites for greater sage-grouse throughout the Great Basin and much of the West. The proposed range-wide guidelines do not recognize the variability of issues across CD the west and do not focus on or prioritize specific issues at the needed scale.	All	Both	emc0215GB
36.	After reviewing some of the food habits of pre---laying hens and chicks it appears there are a number of introduced, invasive	All	Both	emc0222GB

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	species plants that are heavily used during the sage grouse life stages. Vegetation management objectives, including objectives for managing noxious weeds and invasive species (including identification of desired future condition for specific areas), needs to focus on how preferred species are treated whether they are invasive or native (see Torell et al. 2002 reference below).			
37.	We kindly request that any future Juniper removal in our area of operations, by any means, be conducted in a manner that leaves several "islands" of Juniper trees at least 5-10 acres in size. In addition, as we have to provide water for our clients from an out of area source and delivered by vehicle we also request that these "islands" be no more than 100-200 yards from existing roads.	All	Both	emc0235GB
38.	Invasive Weeds: Within the boundaries of the proposed ACEC, special management is required to limit the spread of invasive weeds such as cheat grass (Bromus tectorim). Cheat grass significantly alters fire regimes, shortening fire frequencies and increasing fire intensities in ways which permanently alter the climax sagebrush vegetation Sage- Grouse require. Presently cheat grass is not classified as a "noxious weed" in Montana and as such receives no state, federal or local resources to control or limit its spread.	All	BLM	emc0248GB
39.	Reduced availability of forbs and insects -- the latter a high-protein food that chicks must have -- are caused by the yearly stripping of vegetation from an area by livestock. Sage-grouse need to eat, but they are literally being starved to death because the biomass that they need simply is not available in many places. Many areas under BLM management are grazed from May to October, every single year. This level of use does not allow native vegetation to recover. When I walk through these areas, I see much bare ground, which encourages the invasion of cheatgrass and knapweed, the seeds of which are carried by livestock and vehicles. These then spread if there is a wildfire. But livestock grazing was the beginning of the problem.	All	Both	emc0268GB
40.	Livestock grazing also causes numerous indirect effects that can negatively impact sage-grouse. For example, in addition to direct competition with sage-grouse for rangeland resources, livestock may also create similar competition for other species such as mule deer, white-tailed deer, elk, pronghorn, and bison. This competition may alter the distribution of these species, which may be particularly important when management for one species is in potential conflict with sage-grouse. One example would be the removal of sagebrush for improvement of elk range. Additionally, livestock can often indirectly spread invasive species or weeds, such as cheatgrass, which can negatively impact sagebrush survival and alter the fire-risk of an ecosystem	All	Both	emc0276GB
41.	Invasive, nonnative plants and the spread of noxious weeds pose a direct threat to sage-grouse habitat. Invasives alter natural plant community structure and composition, productivity, nutrient cycling, and hydrology, and may cause declines in native plant populations through competitive exclusion and displacement. As a result, invasive plants may reduce or eliminate native vegetation that sage-grouse require for food and cover, resulting in habitat loss and fragmentation.	All	Both	emc0276GB
42.	Cheatgrass is the primary invasive threat to sagebrush habitat. For example, one study estimates that approximately 80 percent of land in the Great Basin Ecoregion (MZs III, IV, and V) is vulnerable to displacement by cheatgrass within 30 years. Furthermore, the Technical Team Report notes that cheatgrass and other exotic plant species tend to invade low elevation Wyoming big sagebrush systems following wildfires, resulting in significant habitat loss.13 Encroachment of pinyon-juniper into sagebrush habitats has also been an increasing threat. The expansion of pinyon-juniper has been attributed to the reduced role of fire, domestic livestock grazing, climate change, increases in global carbon dioxide concentrations, and alterations during recovery from past disturbance. There exist a variety of both regulatory and nonregulatory mechanisms to control invasive plants, but it is unclear how effective these measures and efforts have been and will be in the future. Estimates show that	All	Both	emc0276GB

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	noxious weeds are spreading at a rate of 931 hectares (2,300 acres) per day on BLM lands, amounting to 339,815 hectares (839,500 acres) per year. While it is not clear whether this estimate is limited to noxious weeds or also includes other invasives, it is nevertheless an estimate of great concern.			
43.	There are currently ongoing efforts to restore or rehabilitate sage-grouse habitats affected by invasive plants. Restoration, however, can be complex, expensive, and sometimes unsuccessful. Where restoration is possible, it can often take decades or longer to see results. Because meaningful restoration must include large expanses of sagebrush habitat, it requires partnerships across multiple landowners that are sometimes difficult to form.	All	Both	emc0276GB
44.	The BLM's westwide planning strategy should recognize that the most important existing threats to sage-grouse are wildfire and invasives (particularly juniper encroachment).	All	BLM	emc0298GB
45.	We have planned 18,525 acres of Juniper removal to expand and restore sage grouse habitat.	All	Both	emc0300GB
46.	That is not to say that all post-colonization changes were beneficial; in particular the introduction of Bromus tectorum (cheat grass) was unambiguously harmful, as may have been also in some cases over-aggressive control of Artemisia (sagebrush) and similar shrub species. However, the only option with respect to Bromus now is to control it through grazing (it is much too widespread, and the control options have too any deleterious side-effects, to hope to eradicate or even significantly reduce its hold on the West), and Artemisia now thrives throughout the West.	All	Both	emc0301GB
47.	Evaluate sagebrush habitat for the presence of invasive plant species - cheat grass, etc. Develop an aggressive strategy to eliminate invasive species in critical sage grouse habitats. Address the introduction, expansion, and persistence of invasive species in the sagebrush ecosystem.	All	Both	emc0305GB
48.	Evaluate the synergistic effects of climate on invasive annual grasses and altered fire regime.	All	Both	emc0305GB
49.	NEI recommends that sage grouse habitat be accurately mapped through sound environmental assessment and that more focus be given to proven threats to sage grouse viability, such as invasive species and fires.	All	Both	emc0306GB
50.	Reduce and reclaim areas of large scale habitat changes due to invasive annual grasses.	All	Both	emc0314GB
51.	Any EIS or SEIS must also explicitly recognize the following points: The extensive encroachment of pinion-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much ofthe West.	All	Both	emc0315GB
52.	Conservation measures need to focus on real and substantial threats such as wildfire, noxious weeds, and other large scale conversions when they specifically threaten a population seasonal segment. Changes in land-use should not be rigidly restricted or prevented from occurring because many times those changes can have secondary benefits such as breaking up or reducing the risk of catastrophic change particularly wildfire.	All	Both	emc0323GB
53.	VI. BLM and USFS Must Evaluate a Reasonable Range of Alternatives In light ofthe different reasons for sage-grouse habitat decline from region to region, and the fact that there remains significant sagebrush habitat in Wyoming and Nevada, each sub-regional EIS should carefully evaluate a reasonable range of alternatives to the conservation measures and regulatory mechanisms proposed in the NTT Report. Some of the contemplated measures may not be necessary or effective in each region or sub-region. Examples of such alternatives include, but are not limited, to the following: The Better Non-Native and Invasive Species Eradication and Control Altemative The EIS should evaluate the impacts associated with better funded and	All	Both	emc0335GB

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	more effective programs to eradicate and control the growth of invasive and non-native species that impede the reestablishment and growth of sagebrush vegetation ecosystems that provide sage-grouse habitat.			
54.	In addition to the issues listed in the accompanying informationJ I encourage the evaluation4f1h,s of the following in all analyses of the environmental impacts of actions on federal lands:Vast acreages of lands have been heavily impacted by invasive species. f2>6Lfl--Fs ill vc,.-wv Focus a significant amount of analysis on recovery of areas of sage grouse habitat impacted by invasive species such as cheat grass	All	Both	emc0338GB
55.	An inevitable consequence of any large, ground-disturbing project is the increased risk of colonization by invasive, non-native species. In the sagebrush-steppe community, in addition to the slow regeneration of sagebrush, the biggest threat is the invasion of cheatgrass. Cheatgrass has the potential to completely alter the ecosystem it invades, increase fire frequency, and prevent the establishment of sagebrush and native grass and forb understory. When cheatgrass becomes a dominant presence on the landscape it can change the fire regime over a very broad area, causing hotter and more frequent fires that destroy nearby sagebrush plants that were not impacted by the original construction project. Even assuming revegetation was successful, there is an increased risk of predation on nests by newly accommodated synanthropic predators. Raven, coyotes and other opportunistic predators will benefit from an open corridor, putting sage-grouse at further risk. The introduction of aggressive fauna and flora invasive species are often linked to human disturbances, such as new roads and construction of facilities associated with any proposed wind project in sagegrouse habitat.	All	Both	emc0339GB
56.	Grazing additionally reduces the instances and severity of wildfires (Launchbaugh et al. 2007); improves Sage Grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel1980, Derner et al. 1994, Evans 1996); and can be used to control invasive weeds (Olson and Lacey 1994, Walker et al. 1994).	All	Both	emc0342GB
57.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: -Invasive plants, especially cheatgrass, are having major impacts on ecosystem function in sagebrush habitats	All	Both	emc0343GB
58.	Native vegetation communities in Great basin sagebrush steppe did not evolve with grazing pressure (Mack and Thompson 1982). Excessive livestock grazing by domestic livestock during the late 1800s and early 1900s had significant impacts on sagebrush steppe and those effects persist today (Knick et al. 2003). Grazing (in addition to other factors) is implicated in the encroachment of conifers in sagebrush steppe, including western juniper (Juniperus occidentalis) (Kerr and Salvo 2007). Decades of livestock grazing have altered plant communities and soil and reduced productivity in sagebrush steppe (Knick et al 2003). Cattle grazed at "conservative" levels in sagebrush steppe in the northern Great Basin initially selected bunchgrasses in interspaces between sagebrush plants (France et al. 2008). The removal of native species from interspaces by cattle, in conjunction with other factors, appears to facilitate invasion by cheatgrass (Bromus tectorum) into these areas (Reisner 2010). The spread of cheatgrass and other invasive plants into degraded rangelands has accelerated the natural fire cycle and threatens to convert enormous areas of sagebrush habitat into annual grasslands (Wisdom et al. 2005; Miller et al. 2011).	All	Both	emc0343GB
59.	Baker (2006) reviewed the fire history of sagebrush ecosystems and found natural fire to be a rare event, suggesting a fire rotation 325-450 years in length. However, overgrazing across many of the Great Basin states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage grouse rely for food and cover. Approximately 36 percent of the greater sage grouse range is invaded by cheatgrass (Lebbin et al. 2010). Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring	All	Both	emc0343GB

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	invades areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.			
60.	Biological invasions, especially invasion by exotic annual grasses such as cheatgrass, are consistently cited as among the most important challenges to maintenance of healthy sagebrush communities (Miller et al. 2011; Wisdom et al. 2005; Suring et al. 2005). At least 46 exotic plants occur in sagebrush steppe (Pyke 2000). Estimates of the rapid spread of weeds in the West include 2,300 acres per day on BLM lands and 4,600 acres per day on all western public lands (See 65 Fed. Reg. 54544).	All	Both	emc0343GB
61.	Cheatgrass, an invasive annual grass, is now the dominant species on 100 million acres (158,000 square miles) in the Intermountain West (Rosentreter 1994: 170, citing Mack 1981). It was estimated in 1999 that 25 percent of the original sagebrush ecosystem has been converted to cheatgrass/medusa-head rye (Taeniatherum caput-medusae) annual grassland, and an additional 25 percent of sagebrush steppe has only cheatgrass as understory vegetation (West 2000). Cheatgrass is estimated to spread at a rate of 14 percent annually in the United States (Duncan et al. 2004: 1412, table 1). The conversion of sagebrush steppe to exotic annual grassland has been described as "massive" (Allen 2003) and is expected to continue (Miller et al. 2011; Hemstrom et al. 2002).7 Cheatgrass thrives in disturbed, and especially burned, areas. It can increase fire frequency, favoring itself and potentially inhibiting perennial seedling establishment (Miller et al. 2011). Cheatgrass incursion into sagebrush habitat can lead to an eventual conversion of sagebrush/grass (perennial) community to sagebrush/grass (annual) or annual grass rangeland. In some cases, cheatgrass invasion encourages other exotic species such as medusa-head rye, knapweed and thistle. It was observed in 1979 that annual-dominated communities in sagebrush steppe appears to have crossed a threshold and created its own new equilibrium (Hanley 1979) from which restoration to functional sagebrush steppe would be very costly and difficult (if not impossible) to achieve (Billings 1990).	All	Both	emc0343GB
62.	Sage grouse do not use cheatgrass. Invasive species was identified as a threat to sage grouse by three expert panels and in recent reviews (Connelly et al. 2011, Table 1). One panel listed cheatgrass as the most important threat to sage grouse in the western portion of its range (70 Fed. Reg. 2267), where it has invaded much of the lower elevation, xeric sagebrush habitat (Miller et al. 2011). Land uses such as livestock grazing (Reisner 2010), off-road vehicle use, and coalbed methane development (Bergquist et al. 2007), can facilitate cheatgrass incursion in sagebrush steppe.	All	Both	emc0343GB
63.	The spread of cheatgrass, which thrives in the wake of fire (both natural and humancaused) further complicates post-fire sagebrush recovery. Once cheatgrass invasion begins, fires result in pure stands of cheatgrass, which tends to burn on a 2-5 year cycle, preventing the re-establishment of native vegetation. Biologists have observed, "Under current, altered fire regimes, natural re-establishment of sagebrush after burning (especially basin big sagebrush and Wyoming big sagebrush) is unlikely" (WAFWA 2006b: 66). Fires and subsequent cheatgrass invasion were a cause of major habitat loss in many of the sage grouse units in northern Nevada, and risk of large-scale habitat loss was high even in areas that had not experienced major problems in the past.	All	Both	emc0343GB
64.	Invasive Plants • Restrict activities on public land that facilitate the spread of invasive plants. • Rapidly restore burned or disturbed sagebrush steppe to prevent incursion of invasive plants. • Develop and implement methods for prioritizing and recovering sagebrush steppe invaded by nonnative plants.	All	Both	emc0343GB
65.	At minimum, the NEPA analysis should address the following: • Evaluating the impact of invasive weeds (especially cheatgrass) on sage grouse habitats, and providing a management framework to reduce or (better yet) eliminate them over	All	Both	emc0343GB

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	time.			
66.	Any conservation strategy needs to increase support for control of non-native vegetation, which is primarily carried by wind, wildlife, and birds, as well as wild horses and to increase cooperation with state and local government agencies;	All	Both	emc0371GB
67.	The Technical Team Report incorrectly assumes that travel is the primary vector for invasive species. In fact wind, wildlife and birds, all of which are present on public lands in abundance, are the primary vectors. BLM WY-040-EA10-111, Environmental Assessment Jim Bridger Power Plant 3-D Seismic and Electromagnetic Surveys, p. 9. The failure of the team to recognize this basic fact again shows the bias of the Technical Team Report. That is not to say that invasive species are not a significant problem. The invasives problem that BLM needs to focus on is cheat grass encroachment on burn sites on the drier end of the sage brush zone. In fact, this has been recognized as the most significant adverse impact to sage grouse habitat west-wide. Ex. 1 p. 3 (effects of land conversion). Similarly, current reclamation policies have been ineffectual in controlling non-native species. Halogeton can be seen at most reclamation sites and often goes untreated. CLG, working as part of a group with the State of Wyoming, BLM and University of Wyoming, has recommended steps intended to better address these invasions in the context of reclamation. The steps involve early site stabilization and use of non-native sterile seed mixes to give native plants the time to be re-established while discouraging invasive plants.	All	Both	emc0371GB
68.	Invasive plants. Issue: Invasion by exotic plants, particularly annual grasses, may permanently alter vegetative composition and fire ecology in sagebrush steppe to the detriment of sage-grouse.	All	Both	emc0391GB
69.	Contributions of Livestock Grazing to Cheatgrass Incursion Livestock grazing appears to spread cheatgrass through multiple effects (Chambers 2008b) and grazing is probably not effective to control cheatgrass in preparation for restoring sagebrush steppe (Hempy-Mayer and Pyke 2008). Other information suggests that there are simply not enough livestock available to graze at the preferred locations, at the preferred intensity, at the preferred times during the year, to control cheatgrass at a landscape-level (McAdoo et al., undated, factsheet). The number of livestock and grazing intensity required to control cheatgrass would also probably have additional negative effects on native vegetation, soil, and other resources in sagebrush steppe that could outweigh any benefits from cheatgrass control. The removal of herbaceous perennials by grazing may increase water and nitrate availability to cheatgrass, and less perennial herbaceous cover may increase cheatgrass invasion (Chambers et al. 2007). The removal of cheatgrass by grazing may also increase cheatgrass seed production the following year (Chambers et al. 2007). Cheatgrass invasibility is lowest on sites with relatively high cover of perennial herbaceous species (Chambers et al. 2007). Cheatgrass incursion in sagebrush steppe began in the 1850s with the introduction of domestic livestock, which trampled the biological soil crust that occupied the interspaces between native vegetation (Mack 1981) and facilitated the species' spread. Intact, lichen-dominated biological soil crusts can significantly inhibit germination and root penetration of cheatgrass (Deines et al. 2007), while the presence of cheatgrass can negatively affect biological soil crust richness and cover (Ponzetti et al. 2007). Moss-dominated biological soil crusts may also effect germination of annual grasses, including cheatgrass (Serpe et al. 2006). The diversity, cover and resiliency of biological crusts are positively correlated to low abundance of cheatgrass, low level of soil disturbance and high moss cover (Ponzetti et al. 2007). Shinneman et al. (2008) discovered that herbaceous and biological soil crust cover and species richness and diversity were generally greater on ungrazed than grazed areas in semi-arid shrubsteppe in western Colorado. The recent proclamation by Davies et al. (2011: 3) that "livestock grazing per se is not a stressor threatening the sustainability of the [sagebrush] ecosystem"—that did not	All	Both	emc0391GB

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	account for the direct and indirect contributions of grazing to the spread of cheatgrass—is without merit. The authors failed to consider the role of livestock grazing in altering the outcome of competitive interactions between bunchgrasses and cheatgrass, or the role of disturbance in succession and community assembly in sagebrush steppe (see Reisner 2010). Similarly, even if sagebrush steppe in the Wyoming Basin evolved with moderate herbivory (Mack and Thompson 1982), grazing prescriptions in sage-grouse habitat in Wyoming (e.g., Cagney et al. 2010) that fail to recognize the increasing presence of cheatgrass in the state (Smith and Enloe 2006, factsheet) may inadvertently contribute to its spread.			
70.	Biological invasions, especially invasion by exotic annual grasses, is consistently cited as among the most important challenges to maintenance of healthy sagebrush communities (Miller et al. 2011; Wisdom et al. 2005c; Suring et al. 2005). At least 46 exotic plants occur in sagebrush steppe (Pyke 2000). Estimates of the rapid spread of weeds in the West include 2,300 acres per day on BLM lands and 4,600 acres per day on all western public lands (65 Fed. Reg. 54544). Cheatgrass, an invasive annual grass, is now the dominant species on 100 million acres (158,000 square miles) in the Intermountain West (Rosentreter 1994: 170, citing Mack 1981). It was estimated in 1999 that 25 percent of the original sagebrush ecosystem has been converted to cheatgrass/medusa-head rye (Taeniatherum caput-medusae) annual grassland, and an additional 25 percent of sagebrush steppe has only cheatgrass as understory vegetation (West 2000). Cheatgrass is estimated to spread at a rate of 14 percent annually in the United States (Duncan et al. 2004: 1412, Table 1). The conversion of sagebrush steppe to exotic annual grassland has been described as "massive" (Allen 2003) and is expected to continue (Miller et al. 2011; Hemstrom et al. 2002).13 Cheatgrass thrives in disturbed, and especially burned, areas. It can increase fire frequency, favoring itself and potentially inhibiting perennial seedling establishment (Miller et al. 2011). Cheatgrass incursion into sagebrush habitat can lead to an eventual conversion of sagebrush/grass (perennial) community to sagebrush/grass (annual) or annual grass rangeland. In some cases, cheatgrass invasion facilitates establishment of other exotic species such as medusahead rye, knapweed and thistle. It was observed in 1979 that annual-dominated communities in sagebrush steppe appeared to have crossed a threshold and created a new equilibrium (Hanley 1979) from which restoration to functional sagebrush steppe would be very costly and difficult (if not impossible) to achieve (Billings 1990). Invasive species was identified as a threat to sage-grouse by three expert panels and in recent reviews (Connelly et al. 2011b (Table 1)). One panel listed cheatgrass as the most important threat to sage-grouse in the western portion of its range (70 Fed. Reg. 2267), where it has invaded much of the lower elevation, xeric sagebrush habitat (Miller et al. 2011). Land uses such as livestock grazing (Reisner 2010), off-road vehicle use, and coalbed methane development (Bergquist et al. 2007), can facilitate cheatgrass incursion in sagebrush steppe.	All	Both	emc0391GB
71.	Non-native Seed. The NTT Report requires use of native seed for restoration, but does allow for consideration of non-native seed where the probability of success or adapted seed availability is low, as long as the non-native seed supports greater sage-grouse habitat objectives. We encourage BLM to analyze the effects of non-native plants in its EISs and SEISs and to amend its LUPs to allow non-native seeds where such seeds support greater sage-grouse habitat. PCW has restored a natural bum area on private land within its project site with dryland alfalfa (Medicago falcata). Observational reports are that dryland alfalfa provides suitable habitat for greater sage-grouse by increasing available forage and cover. PCW has developed a study design to monitor the utilization of dryland alfalfa areas within its project area for consideration liS an effective conservation measure for greater sage-grouse.	All	Both	emc0399GB
72.	Wildfire, invasion of non-native plant species and livestock grazing work synergistically. Yet BLM and other agencies	All	Both	emc0411GB

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	repeatedly try to point to fire and invasive species as threats divorced from livestock grazing disturbance, the most pervasive ecological stress across all parts of the sage-grouse range. Fires are occurring more frequently, and the size and intensity of fires are increasing. Fires reduce or eliminate shrubs, disturb soils, destroy microbiotic crusts, and release nutrients that allow cheatgrass and other weeds to thrive. The end result in grazed landscapes is a paucity of shrub cover, few forbs, a shorter period of green plant material (as fires result in hotter, drier sites with little vegetation to trap snow, shade ground, and block wind), and a longer fire season.			
73.	Cheatgrass germinates and dries up earlier, and outcompetes native plants for water and nutrients – leading to further altered fire regimes, nutrient loss, altered microclimates, and increased erosion. In 2004, it was already known that 80% of the lands in the Great Basin are susceptible to cheatgrass invasion. Earlier ICBEMP analysis had highlighted the severe threat posed by cheatgrass across much of Idaho, Oregon, portions of Utah and northern Nevada. Cheatgrass known over a decade ago to be the dominant vegetation community on 25 million acres (1/3 of the Great Basin).	All	Both	emc0411GB
74.	Cattle evolved in, and are adapted, to, cool, moist climates and are not native to the arid West (Mack and Thompson 1982). Cattle feed preferentially on native grasses and forbs reducing or eliminating critical components of sage-grouse habitats. Historic and chronic ongoing livestock grazing eliminates or reduce food, nesting cover and cover from predators. Livestock and management activities disturb and displace sage-grouse including in lek, nesting and winter habitats.Through degradation of the native plant communities, and trampling, displacement, compaction, erosion, of soils and microbiotic crusts, the livestock create ideal sites for weed infestation. Livestock are also vectors of weed spread. Weeds thrive in livestock manure nutrients (Belsky and Gelbard 2000). Impacts are intensified by livestock facilities like fences, water troughs, supplemental feeding/salting sites, yet agencies promote all of these actions, and continue to tout these actions as beneficial and include them in laundry lists of BMPs. Many of these actions are conducted with minimal or piecemeal NEPA. In reality, such practices are overwhelmingly beneficial only to livestock, and serve to shift and intensify disturbance into remnant less grazed areas.	All	Both	emc0411GB
75.	And a basic question: Where was sagebrush present at the time of the older Plan RODs compared to the present? Where did BLM treat lands for forage, fuels, other purposes and what is their condition now? What existing treatments or seedings had been identified in LUPs, and what is their condition now? Following fire: Where, when and how did BLM rehab/restore/treat sagebrush under the Plan? Detailed mapping and analysis must be provided. Where was cheatgrass present, and in what percentage cover? How has this changed in both burned and unburned lands? How soon did BLM allow livestock grazing to disturbance to resume following fire rehab, and what was the outcome? A solid baseline must include all of this type of information.	All	Both	emc0411GB
76.	If cheatgrass was not present pre-treatment, then opening up the plant community through radical treatment disturbance, promotes its increase through creating of a hotter, drier micro-climate once shrubs are removed. Then chronic livestock disturbance with minimal rest after any treatment favors weed increase and retards recovery. There is often a bit of a lag time (4 to 6 years) when cheatgrass and other weeds appear in significant amounts in sites where they were not present pre-disturbance.	All	Both	emc0411GB
77.	Weeds destroy the ability of the native species to recover, especially with any continued disturbance. Disturbances like grazing must be removed so sagebrush communities can withstand invasive species and the unraveling that ensues following cheatgrass/medusahead dominance. This is supported by the ICBEMP science of over a decade ago that has been ignored by	All	BLM	emc0411GB

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	federal agencies.			
78.	The Notice states that the BLM and FS will develop "vegetation management objectives including objectives for managing noxious weeds and invasive species (including identification of desired future condition for specific areas) within greater sage-grouse habitat." What does this mean? More massive pinyon-juniper killing and sagebrush killing that will make little if any difference to sage-grouse populations subjected to relentless chronic grazing disturbance and where ongoing disturbances will continue near status quo and even more development would be allowed?	All	Both	emc0411GB
79.	For the past couple of years, agencies have been using another category to try to separate out populations, and minimize the importance of losses to the sagebrush habitats. This is the effort to segregate greater sage-grouse into eastern vs. western portions of the range on the basis of claims that grouse face different threats in different parts of their range. USFWS used this artifice in defending its toothless Warranted but Precluded Finding in litigation, and took it to absurd lengths in its arguments there. First, many of the same threats occur across the range - livestock grazing, roads no matter what the cause, invasive species, mining. Second, increasingly renewable energy threats with many of the same impacts as oil and gas are accelerating in the western portion of the species range, and mining is exploding in northern and central Nevada and some other western areas. Plus hundreds of thousands of acres are now being leased for oil and gas development all over Nevada. Renewable energy examples: Major industrial wind farm on Steens Mountain Oregon and new transmission lines, major new transmission lines like Gateway and MSTI, geothermal development often by foreign entities (McGinness Hills and other areas), massive geothermal leasing proposals are appearing - for over 500,000 acres on Bridgeport Ranger District lands and elsewhere in NV. Mining is expanding into new areas where sage-grouse populations are already barely hanging on, and new mining is proposed in areas with larger populations, as well. In the east, weeds like cheatgrass are increasing (see WBEA Assessment discussion). New and expanded mining, new transmission lines, and oil and gas harms are far exceeding those agencies claimed would occur from these new or recently expanded developments. See 2012 Yubanet article on failures of Wyoming Core Model in the Powder River Basin.	All	Both	emc0411GB
80.	BLM merely lists washing vehicles to limit invasive species, a standard practice for decades now. BLM ignores integrated weed management actions like removing livestock disturbance that spreads weeds crosscountry affecting a landscape much beyond the bulldozed disturbance area weed infestation footprint of a typical energy project and its associated roading and other disturbances.	All	BLM	emc0411GB
81.	The NTT at 18 admits that Energy and Minerals development poses risks including: Direct disturbance, displacement, or mortality of grouse; Direct loss of habitat, or loss of effective habitat through fragmentation and reduced habitat patch size and quality; and cumulative landscape-level impacts. However, the NTT and IM provide minimal, uncertain, non-mandatory and ineffective BMPs that mirror those for fluid mineral development. These are basically common sense, and what a developer may need to do anyway to avoid prosecution for littering. For example: "Clean up refuse." "Control the spread and effects of non-native plants." This is meaningless. How will this be effectively done in landscapes suffering often multiple forms of disturbances all of which promote invasive species? Is it even feasible without eliminating livestock disturbance to disturbed sites and adjacent sagebrush areas? What battery of chemicals may be used? BLM has no integrated weed strategy, so it is impossible for this to even be applied.	All	Both	emc0411GB

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82.	Power washing vehicles does nothing to stop transport from roads accessing sites. When is BLM going to start "power washing" livestock - i.e. conducting integrated weed management to minimize transport and spread of weeds? Through quarantining animals for weed seeds to pass through guts, prohibiting turnout into lands without weed problems when livestock are coming from a weedy area, prohibiting knowing turnout onto weedy area until weed infestation is addressed, etc.?	All	BLM	emc0411GB
83.	The language here (p. 71 fuels) is "key" habitats - such as give priority for implanting sage grouse habitat restoration projects in annual grasslands to areas adjacent to or surrounded by key sage grouse habitats. So how is BLM going to do this - when it has discarded the whole Key area concept, and cast aside other areas long identified for restoration with its flawed PPH mapping? Other provisions here appear to promote bulldozing of fire lines - which often an damage cultural and other resources, and wild land areas. BLM must place a moratorium on its destructive and expensive "fuels" projects in the Interim - until a comprehensive plan with mandatory and rock solid safeguards is developed. It must conduct a comprehensive and full evaluation of all existing treatments from 1950 to the present must be provided for each BLM/Forest District. Risk of weed infestation resulting from treatment must be assessed for all areas, as well. This must include full examination of cheatgrass risk, which may have a 5-6 year lag period from the initial BLM disturbance if limited cheatgrass was present pre-treatment. The NTT reads like BLM fire rehab plans from 30 years ago. It allows BLM to continue to use exotic species like the many millions of acres of supposed "placeholder" crested wheatgrass that has been planted, and which now is burning with great regularity and that BLM has refused to remove, restore with native, or even interseed to any significant degree. How many areas have had some crested wheatgrass seeded on them -over all periods of time- for livestock forage and/or fire purposes? Please map these, and overlay mapping of fires and fire frequency.	All	BLM	emc0411GB
84.	The Fire Management BMPs are just SOPs - and have been for over a decade. They have been largely ineffective - as BLM has used "fuels" concerns to alter, fragment and destroy critical sage-grouse habitats, promoting weeds and grassy hotter, drier desertified sites that also serve to allow intensified livestock impacts. BLM must fully evaluate the habitat losses and fragmentation that have occurred as a result of its projects- and that have spread of cheatgrass and other weeds as a result.	All	BLM	emc0411GB
85.	Scientific research indicates that grazing is beneficial to the greater sage-grouse and to a host of other wildlife. Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species	All	Both	flj0000GB
86.	The EIS and SEIS revi,sioils should clarify that multiple-une management concepts should be used to reduce the risk of catastrophic wildfire, improve forage. refilove invasive species and provide open space. We strongly encourage the agencie.r to prioritize theit focus on public land use, or disuse, which poses a real threat to the greater sage-grduse and its habitat	All	Both	fxc0006GB
87.	There is almost no research on inva<;ive plants, evcn cheatgrass, and sage grouse (Rowland and Wisdom 2002). Ecological Site Descriptions must describe the susceptibilities of different vegetation states to inva.;;ive plants after various weather pattems, types of disturbance, and management actions.	All	BLM	fxc0011gb
88.	I feel the biggest detriment to habitat for cattle and wild life is club moss. Many people look out over their pastures and see sagebrush as a threat to their pastures. We did too until we started looking under the sagebrush. The real culprit is club moss. This cannot be removed by reducing cattle numbers. On one range field trip we examined and exclosure that had not one head of cattle on it for the last 40 years. It had as much club moss inside the fence as outside of it. A range expert told me once	All	Both	rmc0003RM

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	that he had placed a clump of club moss in a box up on a shelf in his office. Six months later he took it down and poured water on it. The club moss turned green and started to grow. There are a few ways to kill club moss. Chemicals do not work very well and are expensive. The best luck we have had on our own land is: (1) winter feeding on it. You will find no club moss on your winter feed grounds. Even rolling one round bale off a hillside will show benefits years later. The heavy concentration of cattle urine kills the moss. Rotating winter feed grounds with summer or fall pasture really improves them. (2) Spiking and drag harrowing the pasture. Gouging up the moss and throwing dirt over it will kill the moss. Just once over with spikes leaves enough sagebrush intact for the grouse. The more club moss that can be killed the more understory will grow among the sagebrush benefiting the sage grouse. Once killed, rotation grazing will keep the club moss from returning. (3) Concentrating a large enough number of cattle in a small enough area will trample the moss. This is difficult to do over a large area. We put salt and mineral out in areas of the worst club moss infestation. No matter where you put out the salt or how far it is from water the cattle will find it.			
89.	Avoid livestock water developments and salt grounds in traditional sage grouse spring, summer, and fall habitats. These developments significantly concentrate livestock and increase forage use, trailing, and soil compaction that fragment sagebrush habitat. These heavy-use areas may extend up to 0.8 km away from the site providing a niche for noxious weeds and other undesirable or unpalatable vegetation to take hold.	All	Both	rmc0024GB
90.	Targeted grazing should be allowed and encouraged as a tool for creating fire breaks, controlling weeds, and improving habitat. In some cases, fencing can help facilitate the success of a Targeted Grazing project. Electric and net wire fencing should not fall under the same specifications as other high-impact problem fencing.	All	Both	rmc0025GB
91.	The Board supports aggressive "integrated vegetation management" and believes that livestock and local permittees could serve as the best means of implementing such activities. The Board does have serious concern with the statement "When necessary, analyses the use of non-native species that do not impede long-term reestablishment goals of native plant communities and Greater Sage-grouse habitat." Based on the "best available science" carefully selected and adapted non-native species are often times the only species that are effective at maintaining key ecological processes and preventing sites from crossing an ecological threshold due to invasion by undesirable species. Non-native plants should not be a second or alternative option; rather, they should be used in combination with native plants where applicable to compete against invasive species. This is particularly true of the Great Basin where native species are especially difficult to establish and often require two or more years for establishment.	All	Both	rmc0050GB
92.	Risk to Sage-grouse from Cheatgrass- Finally, Dr. Holloran noted the risk of the infiltration of Cheatgrass and other grasses as a result of oil and gas disturbance that would negatively impact the sagebrush obligate sage-grouse. This would limit the population, eliminate nesting and early brood-rearing habitat and reduce winter and severe winter range. !d. at 7.	CO	BLM	emc0057RM
93.	CPW believes the following range-wide threats pose the greatest risk to greater sage-grouse populations and their habitats (not in order of risk): Prescribed fire as management tool may be appropriate in limited conditions; however, introduction and invasion of exotic weeds resulting from a burn is a major concern for sage-grouse. The long-lasting effects of fire on sagebrush regeneration and growth form and thus, impacts to sage-grouse nesting and winter habitats also need to be carefully considered prior to implementing prescribed fire in sagebrush systems.	CO	Both	emc0072RM

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94.	CPW believes the following range-wide threats pose the greatest risk to greater sage-grouse populations and their habitats (not in order of risk): Cheatgrass and pifion-juniper encroachment in the sagebrush biome reduces the value of the habitat to greater sage-grouse. The PRMP should contain language that recognizes the value of proactive restoration projects and should prioritize projects that enhance or restore habitat. Properly designed proactive habitat restoration projects should not be precluded because of potential disturbance factors or predetermined metric thresholds.	CO	Both	emc0072RM
95.	Recent modeling studies have shown the possible expansion of cheatgrass in the Eastern Region under various climate-change scenarios (Bradley 2009).	East	Both	emc0034RM
96.	i. Lander, WY RMP Because of the aggressive nature of invasive species, such as cheatgrass, we support flexibility for treatment of invasive species. Managers should be permitted to use chemical treatments in extreme conditions, as noted for Alternative D, understanding that prevention is the most effective approach. The value of avoiding unnecessary soil disturbances and implementing aggressive reclamation where needed cannot be emphasized enough. The use of chemical treatments should be minimally used and only after thorough consideration of other measures and a comprehensive review of potential impacts to existing resources (plant, wildlife, water sources, etc from chemical use. For example, the DEIS notes that broad-spectrum insecticides should not be used in grouse brood-rearing areas because of the adverse impacts to non-targeted insects that are critical to young grouse. (DEIS at 865).	East	Both	emc0089RM
97.	iii. Strong components of Wyoming's approach Wildfire, a major form of disturbance that often is followed by the invasion of non-native species, is being addressed through active fire suppression in core areas. Operators are required to control noxious and invasive weed species, including cheatgrass.	East	Both	emc0089RM
98.	Any conservation strategy needs to increase support for control of non-native vegetation, which is primarily carried by wind, wildlife, and birds, as well as wild horses and to increase cooperation with state and local government agencies;	East	Both	emc0155RM
99.	The Technical Team Report incorrectly assumes that travel is the primary vector for invasive species. In fact wind, wildlife and birds, all of which are present on public lands in abundance, are the primary vectors. BLM WY-040-EA10-111, Environmental Assessment Jim Bridger Power Plant 3-D Seismic and Electromagnetic Surveys, p. 9.. The failure of the team to recognize this basic fact again shows the bias of the Technical Team Report. That is not to say that invasive species are not a significant problem. The invasives problem that BLM needs to focus on is cheat grass encroachment on burn sites on the drier end of the sage brush zone. In fact, this has been recognized as the most significant adverse impact to sage grouse habitat west-wide. Ex. 1 p. 3 (effects of land conversion). Similarly, current reclamation policies have been ineffectual in controlling non-native species. Halogeton can be seen at most reclamation sites and often goes untreated. VRLP, working as part of a group with the State of Wyoming, BLM and University of Wyoming, has recommended steps intended to better address these invasions in the context of reclamation. The steps involve early site stabilization and use of non-native sterile seed mixes to give native plants the time to be re-established while discouraging invasive plants. Finally, BLM needs to support efforts to improve rangelands by removing piñon juniper, and other undesirable brush. Piñon juniper encroachment on the upper elevation, wetter sage brush sites has been part of the demise of summer sage grouse habitat. This has been due primarily to the lack of fire on these wetter sites. The encroachment of these species has reduced prime sage brush habitat. Too often these projects are postponed.	East	Both	emc0155rm

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100.	I am a livestock producer based in the state of Nevada. Livestock grazing is a legal and valid use of public rangelands and is a vital component of my livelihood. The extensive encroachment of pinyon-juniper into sagebrush communities, coupled with vast expanses of decadent single aged sagebrush communities, has drastically decreased productive habitat for nesting and brood rearing sites for sage-grouse throughout the Great Basin and much of the West. The proposed range-wide guidelines do not recognize the variability of issues across the west and do not focus on or prioritize specific issues at the needed scale.	GB	Both	emc0304GB
101.	The Board supports aggressive "integrated vegetation management" and believes that livestock and local permittees could serve as the best means of implementing such activities. The Board does have serious concern with the statement "When necessary, analyses the use of non-native species that do not impede long-term reestablishment goals of native plant communities and Greater Sage-grouse habitat." Based on the "best available science" carefully selected and adapted non-native species are often times the only species that are effective at maintaining key ecological processes and preventing sites from crossing an ecological threshold due to invasion by undesirable species. Non-native plants should not be a second or alternative option; rather, they should be used in combination with native plants where applicable to compete against invasive species. This is particularly true of the Great Basin where native species are especially difficult to establish and often require two or more years for establishment.	GB	Both	rmc0050GB
102.	In addition to these goals, the Group has identified key threats to sage grouse in the Jarbidge Planning Area that they believe deserve special attention and consideration. These key threats include fire and invasive species, with fire having recently damaged a significant portion of the sage-grouse habitat in the Jarbidge Planning Area.	IDMT	Both	emc0158GB
103.	The next generation of analyses to direct conservation action should be two fold. First, there is a need to support implementation of core regions with studies that document seasonal habitat use and migration patterns of radio-marked sage-grouse (Aldridge and Boyce 2007, Doherty et al. 2008) to ensure identified priority landscapes meet all seasonal habitat needs. Second, incorporation of future modeling of other relevant risks, such as cheatgrass (Bromus tectorum) invasion, to core regions will ensure gains in conservation will not be offset by unevaluated risks. Well, there is nothing in the Makela and Majors Idaho White Paper about risk of cheatgrass, is there? Yet ID set about chopping off habitats with this score scheme, it appears without assessing risk. It does not appear that Nevada assessed risk, either. So habitat segregation is occurring in lands most vulnerable to cheatgrass without assessing risk. Precautionary management requires that agencies do these studies first – before sacrificing habitat to the oil and gas, wind or other industries. There is no going back, and replacing habitat sacrificed under the core or priority scheme models. Regarding cheatgrass – this already has been done- for example, in the embargoed WBEA, Great Basin, and Nevada Ecoregional Assessment reports. If cheatgrass is a concern, it makes no sense to write off areas currently with less cheatgrass – as has been done in ID Pahsimeroi, Little Lost, Lemhi. Agencies can amend or alter rights-of-ways or leases.	IDMT	Both	emc0411GB
104.	It appears that the agency has overlooked many of the benefits that the continuance of livestock grazing provides. These include: Preservation of open space; Noxious weed and invasive species eradication and containment; Production of forb growth that is preferred by greater sage-grouse to non-grazed areas; Wildfire prevention and controlled burn efforts; Development of wildlife watering sources, including placement of bird ladders in troughs; and Predator control. Rather than undertaking an attitude of restricting livestock, the agencies should utilize grazing as a tool to manage for the U.S. Fish & Wildlife Service's list of primary threats affecting sage grouse in Idaho including fires and invasive weeds.	IDMT	Both	flh0000GB

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105.	The Dillion Local Working Group identified 5 key issues in the area: 1. invasive plant species	IDMT	Both	rmc0028GB
106.	The County is also very supportive of targeting PI encroachment into Sagebrush ecosystems, including within Wilderness Areas. Policies should encourage, and not restrict, use of all tools (stewardship contracts, utilization of products to expand treatments, temporary access to treatment areas to minimize costs, etc.) to accomplish these projects in Priority and General Habitat in Lincoln County.	NVCA	Both	emc0130GB
107.	Invasive weeds have been identified by the USFWS and others as a major factor in the loss, degradation, and fragmentation of Sage Grouse habitats, both directly and as a critical part of the fire-weeds-fire syndrome. We have provided comments on the need to strengthen weed control objectives in some agency program areas, but weeds are a problem in all uses of the public lands. Funds for managing weeds is intermittent but the spread of weeds is inexorable. Millions of acres of sagebrush habitat have been lost to fires and millions more acres have been degraded when cheatgrass and other weeds replace a healthy native understory os still intact sagebrush country. This threat to Sage Grouse and its habitat cannot be overstated and needs the best conservation measures we can devise to be included in the EIS on amending land use plans.	NVCA	Both	emc0283GB
108.	Grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species.	NVCA	Both	emc0304GB
109.	The next generation of analyses to direct conservation action should be two fold. First, there is a need to support implementation of core regions with studies that document seasonal habitat use and migration patterns of radio-marked sage-grouse (Aldridge and Boyce 2007, Doherty et al. 2008) to ensure identified priority landscapes meet all seasonal habitat needs. Second, incorporation of future modeling of other relevant risks, such as cheatgrass (Bromus tectorum) invasion, to core regions will ensure gains in conservation will not be offset by unevaluated risks. Well, there is nothing in the Makela and Majors Idaho White Paper about risk of cheatgrass, is there? Yet ID set about chopping off habitats with this score scheme, it appears without assessing risk. It does not appear that Nevada assessed risk, either. So habitat segregation is occurring in lands most vulnerable to cheatgrass without assessing risk. Precautionary management requires that agencies do these studies first – before sacrificing habitat to the oil and gas, wind or other industries. There is no going back, and replacing habitat sacrificed under the core or priority scheme models. Regarding cheatgrass – this already has been done- for example, in the embargoed WBEA, Great Basin, and Nevada Ecoregional Assessment reports. If cheatgrass is a concern, it makes no sense to write off areas currently with less cheatgrass – as has been done in ID Pahsimeroi, Little Lost, Lemhi. Agencies can amend or alter rights-of-ways or leases.	NVCA	Both	emc0411GB
110.	The table labeled "Threats to Sage Grouse and Habitat" lists invasive species as the greatest threat. We assume this includes cheat grass, which is becoming more prevalent on the Jim Sage Mountain each year as it crowds out native vegetation and increases the threat of wildfires.	NVCA	Both	rmc0064GB
111.	We are appalled at the generally poor condition of the public lands in Central Oregon. It would appear that the public lands have been overgrazed for so many years that there aren't many grasses or shrubs left to provide food and shelter for the grouse, antelope, or other native species. Wherever we hike, cheat grass is outcompeting the native grasses. Why? Because cheat grass sprouts early in the spring, and goes to seed by May or June. Guess when the cattle are set lose on the land? Not when the cheat grass is growing strong, but later in the year when the native bunch grasses are trying to put up seeds. The	OR	Both	emc0152GB

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	"management" practices of the high desert BLM land have been encouraging cheat grass and juniper growth, and therefore have upset the balance of all the native plants. The current practices continue to worsen the available fodder for the livestock set out to graze them. These practices have got to stop. You need to manage the BLM lands in a manner that can continue to sustain both the native plants and animals, which will also improve the grazing for livestock. You cannot continue to allow the cattle and sheep to graze the same sparse terrain every year. Give it a rest. Let the bunch grasses and native flowers go to seed for a couple of years before allowing the livestock back. Or change the time of year you allow grazing to March - April because there is plenty of cheat grass to eat. And they will eat it when it's green.			
112.	The most common problem in mountain big sagebrush plant communities is conifer encroachment leading to reduced or lost understory plant production. Management treatment of this issue has largely been worked out and restoration is limited only by available restoration dollars.	OR	Both	emc0192GB
113.	Livestock Grazing is today by far the largest area land use throughout eastern Oregon. Grazing activity at almost any intensity can be shown to product Invasive Weed problems that require use of Vegetation Treatments detrimental to Sage Grouse productivity.	OR	Both	rmc0036GB
114.	in the one million acre Upper Sevier Watershed, we have approximately 400,000 acres of P/J. Granted all these acres of P/J would not merit treatment, but treatment of 1,000 acres/year is not even keeping pace with the conversion to P/J. My point is that we need to be aggressively treating P/J and right now we're doing a great job, but were not keeping up with the slow conversion process. The BLM needs to treat more acres with the same budget which is possible with the current technology.	UT	Both	emc0165GB
115.	Blue Mt. has fallen victim to the thought that fire isn't a good thing (the aggressive Smokey Bear era) and could benefit from the use of controlled or prescribed burns since there is way too much large sagebrush and too thick of populations of sage for sage grouse to flourish. The absence of fire has also allowed pinion and juniper to encroach into the sage brush, this encroachment needs to be addressed and also other methods of sage brush control need to be investigated	UT	Both	emc0406GB
116.	Agency Land Management Policies - BLM and Forest Service policies related to invasive species. Wildfires and predators along with strategic livestock grazing should be reassessed pertaining to Sage Grouse habitat. Reduced livestock grazing and reduced chaining of pinyon-juniper coupled with wildfire policy have allowed invasive plant species to expand across the West. Including on Sage Grouse habitat. Short duration, heavy grazing on invasive cheatgrass areas when palatable for livestock as a management tool could help return healthy livestock grazing land and Sage Grouse habitat with little or no government expenditure. Policies that don't allow chemical treatments of predators and invasive species on federal lands need reevaluation.	UT	Both	rmc0003GB
117.	Garfield County requests detailed analysis regarding management of invasive species as it relates to Sage Grouse Habitat. Federal agencies have recently taken the position that state listed noxious weeds cannot be controlled because they provide habitat for federally listed sensitive species. Garfield County requests that this conflict be evaluated in the plan.	UT	Both	rmc0006GB
118.	Treatment of weeds and pests must remain a source of available management. Neither treatment usually occurs during courting or nesting time frames. These management tools must not be removed due to disturbance concerns. After the nesting period any sage grouse flushed while doing treatments will return as the treatment activity does not cause a major disturbance and is not a continual ongoing disruption to the daily lives of the sage grouse.	WY	Both	emc0050RM

Table C-8.B
Comments Related to Weeds/Invasive Species

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
119.	'Activities excepted by the State plan from the conductance of a DDCT calculation' (page 7 letter) What about herbicide and pesticide use that occurs on the rangeland away from roads, locations, pipelines and ROWs---? The treatment of pests and noxious and exotic invasive grass species are important to help any habitat improve. If the treatment will not disturb a specific area for more than 1 hour in a 24 hour period and will not reduce the sagebrush canopy as per the WGFD protocol then these treatments should be exempt as well. And so noted.	WY	Both	emc0050RM
120.	'Avoid the use of prescribed fire in areas of Wyoming big sagbrush and or within areas of less than 12 inches of annual precipitation.'(page 12 letter) Treatment for cheatgrass or downy brome is important and burns are tool that is used. More specificity is needed here-treatments will continue with burns for cheatgrass if the canopy of sagebrush is not reduced a certain %. There are many areas where downy brome can be burned without harming the sage brush and will bring in better forage post treatment. The rainfall limitation will prevent many areas of the state from prescribed burns because of the lack of water. Place this limitation on a case by case basis as there are several areas with invasive weeds or grasses that would benefit from a good burn but the rainfall limitation of 12 inches makes this a no go.	WY	Both	emc0050RM
121.	i. Lander, WY RMP Because of the aggressive nature of invasive species, such as cheatgrass, we support flexibility for treatment of invasive species. Managers should be permitted to use chemical treatments in extreme conditions, as noted for Alternative D, understanding that prevention is the most effective approach. The value of avoiding unnecessary soil disturbances and implementing aggressive reclamation where needed cannot be emphasized enough. The use of chemical treatments should be minimally used and only after thorough consideration of other measures and a comprehensive review of potential impacts to existing resources (plant, wildlife, water sources, etc from chemical use. For example, the DEIS notes that broad-spectrum insecticides should not be used in grouse brood-rearing areas because of the adverse impacts to non-targeted insects that are critical to young grouse. (DEIS at 865).	WY	Both	emc0089RM
122.	iii. Strong components of Wyoming's approach Wildfire, a major form of disturbance that often is followed by the invasion of non-native species, is being addressed through active fire suppression in core areas. Operators are required to control noxious and invasive weed species, including cheatgrass.	WY	Both	emc0089RM
123.	9) Prevent the introduction of invasive plants in sage grouse habitat and promote control of infestations.	WY	USFS	emc0144RM

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Not all sagebrush is equal in value- some stands are so thick & dense that they are of very little use.	All	Both	cfc0018RM
2.	If population has been declining for 100 years keep in mind 100 years ago the density of sagebrush was lots less also	All	Both	cfc0031GB
3.	It states sagebrush takes many years to recover - FALSE - if burned, sprayed, farmed and not not overgrazed, sagebrush still recovers within 10 years.	All	Both	cfc0031GB
4.	Where sagebrush is allowed to thrive and never burned or sprayed it sucks all the moisture from the soil - push out other healthy plant species. Where sage is over 2' tall you don't see sagehens. It will grow 15' tall.	All	Both	cfc0031GB
5.	In 2008-2009 leks were cut in half, agriculture caused reductions in leks as did a lot of roads. Sage-grouse were found to be half as likely to maintain their nests in Silver Sage as in Big Sage. North Dakota saw a tremendous drop in bird populations.	All	Both	emc0012RM
6.	I read that the down turn of the sagegrouse is due to habitat loss. The habitat and it's quality have changed. As sagebrush matures, it prevents seedlings from gr?wing. Not until the sagebrush starts to deterioriate does it allow seedlings. Most sagebrush is in the 30-40 yr range. It needs to be disturbed to allow seedlings to grow.	All	Both	emc0013GB
7.	I feel that the decline in sagegrouse no.s is not JUST habitat loss/change, it is habitat quality, predator control and birds of prey. Sagebrush needs to be disturbed, burned most likely. The govt. needs to tell the public that we can't have everything. If we have birds of prey and coyotes we most likely I won't have no.s of sagegrouse and other birds. If we want more sagegrouse, we need to improve the sagebrush habitat, not just lock it up and do nothing to it. And we need to reduce our predatory animals and birds. Can't have it all.	All	Both	emc0013GB
8.	I am a plant ecologist with decades of field experience and the architect of a fair bit of revegetation including sagebrush-steppe. I believe that your ability to constructively change community structure or composition on a scale approaching significance at a regional scale is approximately zero. Work on the more easily manipulated factors including some I haven't mentioned. Catering to permittees isn't going to impress court review if it comes to that.	All	Both	emc0038GB
9.	First, there is no shortage of sagebrush habitat in the west, which is the principle habitat for sage grouse.	All	Both	emc0043GB
10.	My point is: there is no shortage of sage brush habitat in the west! There are still hundreds of millions of acres of sagebrush in federal, state and private ownership throughout the west. Lets stop using a small decline in the sage brush type as an excuse for excessive bureaucratic regulations.	All	Both	emc0043GB
11.	The second point I would like to make is that the sagebrush type has changed in the past 100 years.	All	Both	emc0043GB
12.	To bring the population back to somewhere near what it used to be, or at least is sustainable, I believe we should manage the sage type closer to its historical condition; that is, more open, with fewer and smaller sagebrush plants and more bunch grass and forbs. That can be done by mechanical means, prescribed fire, or sheep grazing, or some combination of all three. Budget-wise we cannot treat every acre of sagebrush in the west, but we can identify the core sagebrush grouse habitat and start there.	All	Both	emc0043GB
13.	In summary, we have lots of sagebrush in the west, but it is not in an acceptable condition for sage grouse. We need to replicate the historic condition of sagebrush (ie, open stands of sage with grass and forbs in between the sagebrush). Do that, and I believe we will have viable populations of sage grouse for a long time to come.	All	Both	emc0043GB
14.	Public lands are for public use, and that means public lands must be managed for multiple use. I am definitely in favor of	All	Both	emc0043RM

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	conservation measures for sage-grouse such as managing for sagebrush, water developments to improve habitat, proper planned grazing, etc. However, we must be careful to not manage the public lands for one species or one purpose. For example, to eliminate livestock grazing in favor of sage-grouse conservation would not only be a bad biological decision (i.e. poor plant health, increased fire risk, etc); it would also go against the basic theory of multiple use.			
15.	I will state state the Gage -Grouse will be listed as an endangered species soon because the BLM can not change any grazing or oil and gas practices. There is over 50 years of study on the decline of Sage-Grouse and Sagebrush and every grazing allotment and gas EA or EIS have been successful of leaving out all requirement for stubble height and Sagebrush requirement. For example the Monument Resource Management Plan had all stubble heights/sagebrush taken out of the document by the local county commissioner Carl Seilstad who strong armed t members of the BLM ID team developing the RMP for the Monument.	All	Both	emc0057GB
16.	We advocate the creation of sagebrush reserves, preserving the best remaining habitat, and a voluntary program for ranchers to turn in their grazing permits in exchange for compensation paid for by conservation groups.	All	Both	emc0068GB, emc0020rm
17.	This scoping is important to identify how intact, diverse and compromised sage-brush habitats need to be managed to enhance this resource's ecologic sustainability that supports dependent species and provides the economic incentive for resident land stewards to remain engaged and on the landscape.	All	Both	emc0070GB
18.	The most important issue to be considered by this scoping is a realistic long term management strategy that includes the players that are necessary to accomplish the task of enhancing the remaining sagebrush ecosystems on federal lands in the west. Management must be based on the site specific characteristics of each viable unit and the identification of short and long term management strategies to keep the resource sustainable. The key person in this process is a resource ecologist that understands the development stages of site specific sagebrush communities and what short term tools are needed to accomplish the changes necessary to keep the community productive and sustainable in the long term. This is complicated because of the differences in site conditions such as species of brush, forbs, and grasses, weeds, perennial grasses and encroachments of all kinds and vegetative thresholds that have been compromised.	All	Both	emc0070GB
19.	The ability to actively manage the sagebrush ecosystem is the biggest challenge the agencies have. Noxious weeds and wildfire are two of the biggest threats to sagebrush habitats	All	Both	emc0070GB
20.	As you scope the management of the sagebrush ecosystems in the west that support sagegrouse, be careful not to compromise the agencies' responsibility and ability to continue developing scientific and object management strategies that promote the sustainability of this resource. The BLM and FS are responsible for the sustainability of the sagebrush landscape on federal lands. The landowner who uses the range resource as an economic unit provides most of the land management activity and funding. We must keep the sagebrush habitat in the west a working landscape to achieve adequate management of this resource. Be careful in this process. You can easily regulate the rancher and livestock off the western ranges. Will the regulations you devise to satisfy the FWS save the sagegrouse and keep the sagebrush ecosystem in a working landscape? The future of sustainable sagebrush ecosystems and their successful management is in your hands.	All	Both	emc0070GB
21.	ISSUE: The proposed Conservation Measures fail to describe the crucial difference between sagebrush habitats that is in good ecological condition vs. sagebrush habitat in poor ecological condition. All of the recommendations concerning managing or restoring the sagebrush habitat type talk about achieving a minimum 50-70% cover for the sagebrush. Some	All	Both	emc0083GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	mention is made of sagebrush communities, but this is never described adequately, even in the Appendix. There can be two areas with the correct sagebrush species and minimum cover; one with the remaining 30-50% in quality grasses, forbs and other shrubs, the other with 30-50% bare ground and exotics such as cheatgrass. One will support healthy sage grouse numbers, the other won't. It's much stronger for a federal biologist to have this information in a nutshell in an LUP when persuading a manager or industry project proponent that all sagebrush or understory communities aren't equal.			
22.	ISSUE: The proposed Conservation Measures fail to convey a difference in sagebrush habitat that is in good ecological condition vs. sagebrush habitat in poor ecological condition. See overview discussion.	All	Both	emc0083GB
23.	You probably heard all this before and that your not allowed to do it on the land. Twenty years ago Dr Alma Winward said to create sage grouse habitat ,get a fifth of wiskey and have a equipment operator drink it ,then get in a grader and plow in the sage brush in a mosic fashon or something that resembles a hoilstine cow. End result tour looking for is more grass,more woody plants with flowers .It just might bring more insects,young grouse need them to live.	All	Both	emc0086RM
24.	The preliminary statement in the four pages devoted to this factor, declares that ten percent of historic sagebrush range has been converted to agricultural use since the onset of EuroAmerican settlement. Edge effects entail an additional effective encroachment on sage grouse habitat, but bear tempering by anecdotal evidence of significant sage grouse persistence within active farmland near Ely, Nevada (Carpenter, 2012).	All	Both	emc0087GB
25.	Sagebrush growth and habitat rehabilitation takes time. Certainly more time than a couple of years allotted before listing the Sage Grouse as endangered. But if you don't start now it's going to take a lot more time until you improve the habitat.	All	Both	emc0091GB
26.	We have witnessed ourselves the change in the habitat in the area. We feel many of those changes aren't all that has been blamed for the decline of the sage grouse. For some reason, the "experts" feel that more sagebrush is better for the survival of the grouse. We feel that smaller areas of brush, around 30% mixed with clear grass areas, or farm areas support much larger populations of birds. We ride both horses and motorbikes frequently, and we witness the birds feeding out in the open and taking cover and nesting in the brush area, and that brush area is usually small brush, not old growth brush. Hence we feel fire areas, when they aren't too large, are very helpful to the birds. It provides them with fresh feeding areas. Conni's Grandfather said there didn't used to be any brush from Dubois to Medicine Lodge, but yet there were many grouse.	All	Both	emc0128GB
27.	Monitoring and reclamation will be a key component to the recovery of the sage-grouse. Increasing pressures on the sage-brush steppe continue to threaten the recovery of the sage-grouse: successful reclamation could successfully alleviate some of this pressure. The database recommended under the communications portion should include information about reclamation attempts including failures and successes. Each alternative should include a matrix describing thresholds at which more stringent management must be implemented.	All	Both	emc0128RM
28.	Conservation of sagebrush communities. The BLM has recognized the value of sagebrush communities to sage grouse and are now implementing practices to restore and enhance those areas. We encourage these practices to continue in partnership with landowners, livestock producers, and interested groups.	All	Both	emc0142GB
29.	As we all know if fire returns, you set your expectations back the similar number of years since the last fire or if they have occurred often enough, to the point it can't come back without significant human intervention and funds. Your impact section needs to address this clearly for the reader. It also needs to address the impacts of agencies planting sagebrush, the	All	Both	emc0149GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	success they have had or not and issues about it and how to protect those new plants in the short and long-term from fire. Protection here is from subsequent fires that may kill plants or hinder their ability to reproduce.			
30.	Professional opinion is inadequate and should not serve as a substitute for intensive site investigations leaving BLM with an arbitrary decision. Wyoming big sage communities and other sagebrush species vary in ecological potential due to moisture and soil differences in Oregon and the western regions. Allotments and pastures are a mosaic of sites located at different elevations on varying ecological surfaces. One size fits all prescriptions do not work and consideration of the variability of different areas should be identified.	All	Both	emc0159GB
31.	Treatment of decadent stands of sage brush in mosaic patterns is critical for sustainability of wildlife populations and range land health. Sage brush rangeland must be treated to preserve it for future generations. Several treatments exist for restarting the sage brush cycle including: fire, mechanical and chemical treatments. These three treatments should be used to treat sage brush, because each has its time and place ·	All	Both	emc0165GB
32.	Professional opinion is inadequate and should not serve as a substitute for intensive site investigations leaving BLM with an arbitrary decision. Wyoming big sage communities and other sagebrush species vary in ecological potential due to moisture and soil differences in Oregon and the western regions. Allotments and pastures are a mosaic of sites located at different elevations on varying ecological surfaces. One size fits all prescriptions do not work and consideration of the variability of different areas should be identified.	All	Both	emc0179GB
33.	In areas where sagebrush steppe has become fragmented by perennial grassland seedings, invasion of annual grassland following fire, agricultural development, or infrastructure development (including all transmission lines not just the larger ones and wind development) it will be important to develop ways to reconnect these fragmented sagebrush steppe areas. Understanding both how sage-grouse now use these areas as well as how they traditionally used them before fragmentation will be key to recovering sage-grouse. Therefore, all infrastructure development must be mapped and their management coordinated to prevent continued habitat fragmentation.	All	Both	emc0181GB
34.	Finally, I recommend that all sagebrush steppe, and perennial grassland and annual grassland adjacent to or surrounded by sage-grouse habitat be placed into an undetermined status and managed for sage-grouse. Some of these areas may be used by low numbers of sage-grouse now but become vitally important to sage-grouse in the future as populations recover. If we continue to exclude these areas it may become impossible to maintain a recovered greater sage-grouse species in the future.	All	Both	emc0181GB
35.	Please push back against those who would lobby for land use plans that would degrade the fragile shrub-steppe.	All	Both	emc0183GB
36.	I'm a big proponent of habitat enhancement for this bird species via prescribed burns that stimulate historic natural fire patterns, along with other measures, such as light-on-the-land, sustainable grazing methods (or complete cow restriction in some fragile areas). The type of land stewardship will of course also benefit many other native lifeforms in our region's sagebrush steppelands.	All	Both	emc0189GB
37.	Using state-and-transition models to link ecosystem function and sage-grouse habitat management in southeast Oregon Building on the above discussion we can think of different potential states for plant community composition within a particular elevation. For example, in low to mid elevation Wyoming big sagebrush habitat of southeast Oregon, potential	All	Both	emc0192GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	states could include A) co-dominance by shrubs, perennial grasses and forbs with limited annual grasses; B) co-dominance by perennial grasses, forbs and annual grasses; C) annual grass dominance, or D) co-dominance of shrubs and annual grasses (Figure 2). Applying what we know of the ecology of these systems, we can begin to assign ecological processes and management practices to movement between states and the result might look something like Figure 2. Movement from one vegetation state to another is referred to as a "transition" and the variables causing that transition are known as "transition factors". The model depicted in Figure 2 recognizes both passive transitions, which occur in the absence of management inputs, and active transitions, which require management input. The transitions associated with arrows moving away from a desired state represent threats to sage-grouse habitat, while transitions associated with arrows moving from undesired to desired states represent conservation opportunities. By knowing the ecology behind these transitions, we can begin to partition how and where to focus limited management resources.			
38.	Professional opinion is inadequate and should not serve as a substitute for intensive site investigations leaving BLM with an arbitrary decision. Wyoming big sage communities and other sagebrush species vary in ecological potential due to moisture and soil differences in Oregon and the western regions. Allotments and pastures are a mosaic of sites located at different elevations on varying ecological surfaces. One size fits all prescriptions do not work and consideration of the variability of different areas should be identified.	All	Both	emc0209GB
39.	Professional opinion is inadequate and should not serve as a substitute for intensive site investigations leaving BLM with an arbitrary decision. Wyoming big sage communities and other sagebrush species vary in ecological potential due to moisture and soil differences in Oregon and the western regions. Allotments and pastures are a mosaic of sites located at different elevations on varying ecological surfaces. One size fits all prescriptions do not work and consideration of the variability of different areas should be identified.	All	Both	emc0222GB
40.	In addition, the list of "negative" aspects of herbivory does not recognize that many of these same conditions can be achieved in the absence of grazing. Plant dynamics of the various sagebrush ecological sites will result in shrub-dominated vegetation over time in the absence of disturbance. Therefore, the lateral cover necessary for nesting and the changes in sage-grouse habitat due to shrub-grass competitive dynamics create habitat conditions unfavorable to sage-grouse nesting, early brood habitat, and pre-laying habitat. While proper grazing management can be a beneficial tool, improper vegetation management can be a detriment to sage-grouse.	All	Both	emc0239GB
41.	Impacts from livestock grazing can be so great that the affected sagebrush system is often unable to be returned to an undisturbed state. This problem is compounded by the fact that restoration of sagebrush habitat by itself presents a challenge, and once alteration of vegetation, nutrient cycles, topsoil, and cryptobiotic crusts have exceeded recovery thresholds, restoration may be impossible. Even if restoration was more successful, however, true restoration efforts may take decades and thus often is considered cost-prohibitive.	All	Both	emc0276GB
42.	There are currently ongoing efforts to restore or rehabilitate sage-grouse habitats affected by invasive plants. Restoration, however, can be complex, expensive, and sometimes unsuccessful. Where restoration is possible, it can often take decades or longer to see results. Because meaningful restoration must include large expanses of sagebrush habitat, it requires partnerships across multiple landowners that are sometimes difficult to form.	All	Both	emc0276GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
43.	We have successfully implemented cool season burns, chemical, mechanical treatments to thin brush and release herbaceous vegetation (Danvir 2005). The overall effect is early seral openings in a sagebrush sea. Hunnicutt 1992 clearly showed that hens selected nest sites in homogeneous sagebrush patches at least 300m in diameter for nesting, but immediately moved broods to highly heterogeneous areas having an interspersion of sagebrush cover and grass-forb dominated feeding areas. Pronghorn populations (Aoude and Danvir 2002) showed similar production and population increases.	All	Both	emc0281GB
44.	Sage-grouse habitat is much of the sage brush dominated areas of North America. To classify areas of the west as general habitat and restrict the problem to anthropogenic related causes is an over simplification of management issues. We are concerned that it could lead to restrictions of extremely large portions of the public lands resulting in denied access.	All	BLM	emc0313GB
45.	Sage-grouse are a group of three separate species of grouse dependent, at least in part, on sagebrush ecosystems in the Western United States. As these ecosystems/habitats differ widely across the entire range, and even more so over the historical range, understanding their function is imperative in any plan or strategy to help protect, or enhance them. Other species of wildlife are also dependent on the same rangeland, and are further reason that single-species management, in lieu of ecosystem management for all species, should not be the management criteria for all dependent species. Sage grouse and related species also cross all classes of land ownership, and management. An all lands strategy should be implemented for the protection of the species, economic activities, dependent communities, and rangeland health.	All	Both	emc0314GB
46.	The historic ranges of all three sage grouse species, which require sage/steppe ecosystems for optimum survival have been reduced and/or fragmented primarily through land use changes on a landscape scale. Non-compatible land uses further effect sage grouse habitat, annual life cycle movement, and support.	All	Both	emc0314GB
47.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Vegetation structure and composition in the sagebrush ecosystem have undergone major changes since European settlement in part due to humaninduced changes in fire regime	All	Both	emc0343GB
48.	Doherty (2008:51, internal citations omitted) pointed to the potential adverse impacts of sagebrush removal projects, stating "My results indicate habitat treatments in the PRB should avoid removing areas with high-density sagebrush," further noting, "Many papers indicate that sagebrush removal can adversely impact sage-grouse, but there appears to be no peer-reviewed research showing that burning, spraying, or mechanically removing sagebrush has substantial positive impacts to grouse."	All	Both	emc0343GB
49.	Off-site mitigation is no substitute for on-site habitat conservation A great many vegetation manipulation projects are being undertaken in the name of sage grouse habitat improvement. In Wyoming, some of the more widespread programs are being undertaken by sage grouse Local Working Groups, the Wyoming Landscape Conservation Initiative (a federal project), the Sagebrush Conservation Initiative (an industry initiative), the Jonah Interagency Office (a joint industry/government operation), and the Wyoming Wildlife and Natural Resource Trust Fund (funded through the state legislature). These projects are being pursued in the name of maximizing the number of acres treated for sage grouse (and often more primarily, livestock) benefit, without regard to whether the vegetation manipulations undertaken improve sage grouse habitat in the short or long term, result in short-and/or long-term impacts to sage grouse habitats and populations, or have no effect at all.	All	Both	emc0343GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
50.	We are concerned that many, if not most, of these projects are actually harming sage grouse habitat in the long term and that the remainder will cause short-term impacts to sage grouse populations that contribute to the multiple serious threats to their existence. The scientific basis for many such projects (which include prescribed burns and mechanical or herbicidal thinning or removal of sagebrush) is extremely shaky, and given the lack of familiarity of the project proponents with basic sage grouse habitat requirements, such projects may unintentionally cause additional damage to sage grouse habitats. The impacts of such projects are starting to be rigorously tested, and in general they have been found to have long-term negative consequences for sage grouse. Holloran and Belinda (2009) was able to document negative impacts of sagebrush removal projects in the Bighorn Basin at very low levels of disturbance (less than 3.5% of the overall landscape). According to Rhodes et al. (2010), prescribed fire results in a loss of sagebrush cover, but also an increase in perennial grasses and invasive forbs, while native forbs did not increase in yield or nutritional value as a result of burns. Beck et al. (2009) found that some important features of sage grouse habitat did not recover to pre-burn levels even after 14 years post-fire. Beck et al. (2011) surveyed a number of rigorous tests of the effects of prescribed fire on sage grouse habitats, and recommended against burning in Wyoming big sagebrush habitats and observed that only limited short-term value in burning mountain big sagebrush. "In particular," concluded these researchers, "prescribed burning leads to a pronounced negative response in sagebrush cover that lasts for at least a few decades." Rhodes et al. (2010) concluded, "prescribed fire will not improve habitat characteristics for sage-grouse in Wyoming big sagebrush steppe where the community consists of shrubs, native grasses, and native forbs."	All	Both	emc0343GB
51.	BLM needs to rigorously evaluate all sagebrush habitat treatment projects to determine how exactly they will impact sage grouse populations prior to counting such projects as assets toward sage grouse recovery or threats to sage grouse persistence. The parameters of these projects should be compared to scientifically established habitat requirements for the grouse: for example, is thinning being implemented in sagebrush stands that exceed the canopy cover preferences of grouse for that type of habitat, or is canopy cover already optimal or too sparse for sage grouse habitat needs? According to one WAFWA commentor, "Some of these proposals are of questionable value, and may actually be detrimental, in terms of impact on sage-grouse conservation" (WAFWA 2006b:13). BCA received a funding proposal from the Bighorn Basin LWG for sage grouse thinning and removal, which proposed to remove sagebrush from stands already at 15% canopy cover, the lower edge of sage grouse habitat preference. An independent expert evaluated the proposal and found it to be counterproductive for the needs of sage grouse. We suspect that many (if not most) such habitat enhancement projects are also prescribing treatments which will harm rather than help sage grouse habitat quality, but instead of being vetted by review from independent scientists, they are proceeding forward in the absence of any critical evaluation of their end effects. Braun et al. (2005) and Rowland (2004) provide basic reviews of sage grouse habitat requirements from a vegetative perspective. The most frequently cited "study" used to justify such projects is an unpublished report prepared for the Deseret Land and Cattle Company, which notes positive results for sage grouse but which lacks either spatial or temporal controls to determine whether sage grouse population response was the result of the treatment applied or a happy circumstance of climactic conditions that would have produced sage grouse population growth in the absence of habitat manipulation. In any case, the Deseret Ranch example is part of a very costly and intensive combination of mechanical and grazing treatments; this ranch (unlike most rangelands in the sage grouse range) is not being managed to maximize livestock	All	Both	emc0343GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	production, but instead trophy elk hunting is the primary management priority (Clait Braun, pers. comm.). Sagebrush "enhancement" projects being implemented across the range if the sage grouse are not replicating all aspects of the Deseret program.			
52.	Prescribed fire is commonly employed putatively to improve sage grouse habitat (such projects are often supported by livestock operators, who typically are primarily concerned with eliminating sagebrush with the misguided belief that this will result in a net increase in forage for livestock). For instance, the Upper Snake LWG reported that the 1,100-acre prescribed burn in the Cherry Creek watershed would benefit sage grouse by improving brood rearing habitat. Sagebrush recovery following such fires takes decades, and can take more than 100 years, causing an immediate reduction in habitat effectiveness for sage grouse in pursuit of some eventual increase in habitat effectiveness at some point in the (distant) future. The net result is that immediate welfare of the sage grouse today is being mortgaged for eventual habitat improvements that are speculative at best. However, unlike pheasants, sage grouse are known to respond poorly if at all to habitat enhancement projects.8 In the WAFWA forum participants noted, "It's important for people to understand that if we are doing habitat projects, it often takes a matter of 10, 20, even 30 years to restore shrub habitat. Habitat treatments that put money on the ground today are speculating on the long-term success of the treatment, and of the sagegrouse response to those treatments. So we'll have to find a way to figure this much longer time frame into our calculations" (WAFWA 2006b: 13). In the absence of rigorous scientific evidence supporting the translation of habitat enhancement projects into increased sage grouse population numbers, the BLM should not consider such projects under its RMPs.	All	Both	emc0343GB
53.	The role of fire in the sagebrush ecosystem, and how (or if) it drives the patch dynamics of the system, is poorly understood at present. A landscape mosaic of burns may not meet the nesting habitat needs of sage grouse (Nelle et al. 2000), and may also fail to meet grouse habitat requirements during other seasons (Wamboldt et al 2002). Large fires of high frequency can extirpate sage grouse populations (Pedersen et al. 2003). In Idaho, reduction of 57% of sagebrush canopy cover resulted in sage grouse population reductions (Connelly et al. 2000b). Thus, it is far from clear that projects which reduce sagebrush density or extent actually benefit sage grouse in the short or long term.	All	Both	emc0343GB
54.	Many sagebrush "control" projects are undertaken based on the perception that sagebrush stands that are dense or tall produce less forage for livestock and also are poor sage grouse habitat; these habitats are based on entrenched myths that conflict with the scientific evidence at hand (Welch and Criddle 2003). Cooper et al. (2007) found no increase of desirable forbs for sage grouse following prescribed fire, but did find a significant increase in exotic forb and grass species following burns.	All	Both	emc0343GB
55.	Once sagebrush is eliminated from the landscape through habitat projects, its recovery can be problematic. Re-establishment of big sagebrush is particularly problematic, as drought stress is particularly acute and seedlings may only become established in unusually wet years or microhabitats. (Lysne 2005, Shaw et al. 2005). While Beck and Mitchell (1997) recommended against sagebrush control projects when canopy cover is less than 20 percent, and recommend against any sagebrush control within 2 miles of leks, projects have been put forward in the name of habitat improvement when canopy cover is less than this threshold, and where the proposed treatment is closer to lek sites.	All	Both	emc0343GB
56.	And a basic question: Where was sagebrush present at the time of the older Plan RODs compared to the present? Where did BLM treat lands for forage, fuels, other purposes and what is their condition now? What existing treatments or seedings	All	BLM	emc0411GB

Table C-8.C
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	had been identified in LUPs, and what is their condition now? Following fire: Where, when and how did BLM rehab/restore/treat sagebrush under the Plan? Detailed mapping and analysis must be provided. Where was cheatgrass present, and in what percentage cover? How has this changed in both burned and unburned lands? How soon did BLM allow livestock grazing to disturbance to resume following fire rehab, and what was the outcome? A solid baseline must include all of this type of information.			
57.	Agency manipulation ("treatment") of sagebrush that is aimed at altering, reducing, and/or destroying sagebrush in anyway must be prohibited in the Interim until agencies fully and fairly evaluate the impacts of all that has been done in the past, as well as in recent years. Tens of millions of acres have been altered in the past, continuing up to 2012. Many of these sites are undergoing weed invasion, and claimed benefits to sage-grouse are simply not materializing. They have reduced and fragmented sagebrush habitats. The BLM's efforts (and other agencies including the Forest Service funding of tens of millions of dollars through the USDA) in continuing the public land livestock industry's War on Sagebrush must be ended. See Rachel Carson, Silent Spring description of the aerial herbicide War on sagebrush, Braun 1998, Welch and Criddle (2003), Connelly et al. 2004, and many recent studies showing few if any positive benefits for sage-grouse of removal of sagebrush, and many negative effects.	All	Both	emc0411GB
58.	Under fire prescriptions that minimize undesirable effects on veg or soils (i.e. minimize mortality of "desirable" plant species). an ID team #4 is just Standard Operating procedure. BLM is supposed to have been following #5 all along, and has failed to do so. "Where applicable" incorporate roads as fuelbreaks. These are all standard operating procedure, or common sense. The overarching problem here is the continued effort by BLM to justify burning, mowing, herbiciding and otherwise altering and destroying sagebrush habitats. Long-term habitat losses and weed invasions are the regrettable consequences of BLM continuing current ineffective SOPs - which is really all Appendix F of the NTT contains.	All	BLM	emc0411GB
59.	Dead sagebrush provides less shading cover to help hold moisture on-site longer. It is reasonable to assume that areas with significant dead sagebrush dry out sooner, and be hotter and drier sites more prone to cheatgrass invasion. Especially in the case of chronic grazing disturbance continuing to disturb microbiotic crusts and understories in these same areas. There is the combined effect of a reduced ability of the systems to hold moisture on site due to loss in effective shrub cover coupled with continued grazing disturbance.	All	Both	emc0411GB
60.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following conservation measures in the relevant Resource Management Plans and Land Management Plans. - Identify and protect important and/or intact greater sage-grouse habitats and identify locations of priority areas on which to focus conservation actions to maintain the function of sagebrush ecosystems (priority sage-grouse habitat).	All	Both	flb0000gb
61.	Identify and protect important and/or intact greater sage-grouse habitats and identify locations of priority areas on which to focus conservation actions to maintain the function of sagebrush ecosystems (priority sage-grouse habitat).	All	Both	flb0000gb and rm
62.	Sage brush is evident and we understand that new growth on sagebrush is their primary food source and it is critical to a thriving Sage Grouse population. Research data has demonstrated that vegetation management practices that stimulate new growth of sage brush are responsible for dramatic increase in grouse population. We request that this condition be attained through grazing, where possible, and with other mechanical or chemical methods as alternatives for old growth	All	Both	fxc0004GB

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Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	sagebrush.			
63.	Many sage grouse studies do not include the subspedes, or even species, of sagebrush studied (Rowland and Wisdom 2002). Vegetation and wlldlife researchers should record the ecological gite and current vegetation state in fueir research reports. This will allow us to extend results to the appropriate sites_	All	Both	fxc0011gb
64.	Recent studies, sueh as those in Knick and Connelly (2011), have modeled and mapped sagebrush habitklts across landscapes. However, there are no landscape approadles to restOJing sagebmsb habitats. If the public decides to restore these areas, we mm:t be able to map and understand the pattern of different ecological sites across landscapes and to develop techniques for restoring these siteslhut are cost-etfective. The sugge~iion of "restoring sagebrush habitats" without consideration of the cost is both impractical and imprudent. For example, BLM may have the technology to convert a lTIonoculture of a perennial grass like crested-wheat grass, to a mix of native perennial gra~s, forb, and shrub species, hut the question is, is it worth the cost and time to do so, particularly given the $15 trillion dollar deficit that the United States cnrrentiy has? In n.early every ca')e, we contend the answer is "no"_ BLM must balance these cost considerations in its analysis of "regtoring sagebrush habitats".	All	BLM	fxc0011gb
65.	Sagebrush and sagebrush-grassland habitats provide important food and cover values for sage grouse and other wildlife. Big sagebrush was common on western rangelands prior to man's settlement and is climax dominant on much of Montana rangeland. The species is successfully reproducing and sustaining itself. Grass and forbs exist with sagebrush in a multi-storied plant community. On properly managed rangelands, grasses can increase under sagebrush canopies. Sagebrush stands are an important facet of diverse habitat landscapes that can include grasslands, riparian areas and timber stands for example. Keys to management of sagebrush and sagebrush grassland habitats are maintaining expansive stands of sagebrush especially varieties of big sagebrush with abundant forbs in the understory, particularly during spring; undisturbed and relatively open sites for leks; and healthy perennial grass and forb stands intermixed with sagebrush for brood rearing. Within suitable habitats, areas should have 15 to 25% canopy cover of sagebrush 30 to 80 cm tall for nesting, and 10 to 25% canopy cover from 40 to 80 cm tall for brood rearing (Connelly et al. 2000). A Montana study showed 27% canopy cover to be the most successful for sage grouse. In winter habitats, shrubs should be exposed 25 to 35 cm above snow level and have 10 to 30% canopy cover exposed above snow. In nesting and brood-rearing habitats, understory habitats with adequate cover of grasses (>15%) and forbs (>10%) at least 18 cm tall are needed (Connelly et al. 2000).	All	Both	rmc0024GB
66.	Livestock grazing is compatible with sage-grouse where the habitat characteristics needed for breeding and wintering can be consistently maintained. It is paramount that only light grazing be permitted on important sage grouse wintering areas, because during winter, sage grouse often use tall, dense stands of sagebrush which remain relatively exposed through deep snow. Light grazing produces mosaics in vegetation and an increase in herbage production that are favorable for Sage-Grouse nesting and brood-rearing habitat. Riparian areas and wet meadows used for brood rearing are especially sensitive to grazing by livestock. Protecting sage grouse nesting and brood-rearing habitat from livestock use also encourages climax vegetative conditions. If this is not feasible, limit grazing to the month of July. Defer grazing until after the peak of the growing season with the intent of providing herbaceous cover and forage for the majority of the nesting, hatching, and early brood-rearing. Cessation of grazing by 1 August is designed to minimize livestock concentrations in wet meadows and riparian areas with open water by avoiding "hot season" use and to allow a 30-day regrowth period before	All	Both	rmc0024GB

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	the first killing frost. Additionally, late summer-early fall regrowth is important for carbohydrate storage in roots and stem bases of cool season grasses. This enhances plant vigor while allowing residual vegetation to accumulate cover for nesting and early brood-rearing the following spring.			
67.	Data shows that successful grazing systems were found to have significantly (p=0.01) less grazing during the "hot season" (July through early September) (12.5 d) than unsuccessful systems with 33 .4d. Likewise, the duration of all livestock treatments was significantly (p=0.001) shorter in successful systems (28.2d) compared to 59.3 d in unsuccessful systems. Given the reluctance of cattle to disperse from riparian areas, the duration of grazing treatments becomes a key factor in determining the severity of impacts such as trampling and mechanical damage, soil compaction, and utilization. A combination of longer duration and more frequent fall grazing deteriorated woody species vigor and regeneration, contributing to diminished floodplain function and reduded riparian dependent values.	All	Both	rmc0024GB
68.	Also, during times of drought, cattle are attracted to moist areas. Failure to adequately manage for these periods may result in greater impact in the form of reduced vegetative cover. Brood-rearing habitats for sage-grouse are typically mosaics of upland sagebrush and other habitats (e.g., wet meadows, riparian areas) that together provide abundant insects and forbs for hens and chicks. Although the adult diet switches to forbs and insects in addition to sagebrush, developing young depend heavily upon insects for food.	All	Both	rmc0024GB
69.	Have quantifiable data collected that shows there is adequate canopy cover of sagebrush (height and percentage of cover) -27% canopy cover appears to be the most successful in Montana. This canopy cover must be contiguous.	All	Both	rmc0024GB
70.	(b) Sage Brush Types: Sage brush is site specific. There are sites where it can't be eliminated. If burned, it will return stronger than ever (usually Mountain Big Sage). There are sites, that when burned, especially repeatedly, result in a total loss of sage brush, (usually Wyoming Big Sage), and there are sites in the middle of these extremes. Understanding sage brush and how it responds or fails to respond to rehabilitation and management is only half of the picture. Probably more important is to know what sage grouse prefer or require over a full year period. Past efforts such as twelve years of work by the "Nevada Page 14 Governors Team" for Sage grouse should be salvaged and updated as a starting point.	All	Both	rmc0057GB
71.	Pages 16 and 17 in the NTT report suggest that BLM only allow treatments that conserve, enhance or restore sage-grouse habitat. An analysis should be conducted to evaluate the need for age-class diversity in sagebrush communities. We also request that the BLM consider allowing other treatments that are designed to achieve alternative objectives as long as they do not negatively impact sagegrouse habitat. Page 26 recommends that fuels management allow no treatments in winter range. Recommending no treatments in winter range is not realistic for PPH in the North Park basin.	CO	BLM	emc0060RM
72.	I think that we need to be able to do sage brush treatments. This will enhance and or restore sage grouse habitat and keep the grass in good health for grazing.	CO	Both	emc0077RM
73.	The desire to manage ecological sites so they are within the reference state is not an achievable goal at the landscape scale. The reference state of ecological sites typically is a mid to early late seral state of the vegetation, along the continuum of early to later seral composition. On sagebrush-grass rangelands in the Great Basin, the reference state of most sagebrush ecological sites is approximately half shrub (mostly sagebrush) and half perennial herbaceous (mostly grasses). Sagebrush does not sprout and can take years to re-establish after a fire or other large scale disturbance (e.g. aroga moth); thus, large areas of perennial bunchgrasses are possible and should be expected. Since it is impossible to remove natural disturbances	GB	Both	rmc0076gb

Table C-8.C
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	from the sagebrush system, attempting to keep all areas at the reference state is impossible. The goal should be to manage the soil-vegetation complex so that post-disturbance succession always has the ability to move toward and achieve the reference state. Management of areas that have progressed too far down the successional scale (moving toward poor resilience - too few perennial grasses) also should not be mandated for return to only the reference state conditions. That can be costly and such states may be short-lived in productive areas. Patch size and shape are important, and perhaps more important than trying to keep the majority of the landscape at the reference state			
74.	BLM provided no map that showed the historic extent of sagebrush habitat in Idaho (or western Montana). In order to understand the degree and severity of sagebrush and sage-grouse habitat and population loss, thorough and detailed mapping of all historic sagebrush habitat is necessary. The changes that occurred over time must be displayed. This is essential to show how the Priority habitat scheme slices off a considerable amount of what remains of the already greatly reduced habitat. We note that at least one isolated population of sage-grouse in western Montana appeared missing from BLM mapping entirely.	IDMT	BLM	emc0411GB
75.	NDOW White Paper March 2012: The paper describes the five categories of habitat, plus non-habitat. It has no category for historical habitat that has been lost. At a minimum, habitat of moderate importance and transitional range, as well as low value habitat that has mature or old growth sagebrush present, must be included as high value, or key, habitat. It is of great concern that human land-use development will be allowed to proceed, but detailed site-specific studies are not required. While sage-grouse may be broadly distributed, the habitat is peppered with holes, and often is highly degraded as well. There is extensive natural fragmentation all the Great Basin mountain ranges as well as salt desert habitats in valley bottoms. On top of this is a plethora of livestock, mining, energy, agency treatment, and fire disturbance adversely impacting remaining habitat quality and quantity. While sage-grouse may be considered an umbrella species by some, in Nevada the agency attitude (for example Ely BLM and ag interests supporting ranchers who seek continued destruction of sagebrush) towards mature and intact sagebrush communities is causing big leaks in the umbrella. In fact, the umbrella is collapsing in many areas as cheatgrass and other weeds sweep Ely treatments claimed to be for sage-grouse. Sage-grouse are being used as an excuse to radically alter sagebrush, and destroy old growth and mature pinyon-juniper as well as trees re-colonizing historic ranges. In fact, the Ely RMP proposes manipulation of fully 2/3 of the native vegetation communities an action likely to result in tremendous desertification and habitat loss for both sagebrush and pinyon-juniper dependent species. We are concerned that the NDOW report claims sage-grouse are an umbrella species for the pygmy rabbit when in fact, NDOW will promote Ely and Elko BLM and Forest Service projects like in the Santa Rosa RD projects that purposefully alter, reduce destroy denser sagebrush required by the pygmy rabbit. This is in part justified by claiming that sagebrush with good microbiotic crust understories and denser Wyoming sagebrush cover is somehow deficient based on biased soil inventories and then added onto this are claims that the community is decadent and only destroying it will somehow save it. When in fact, these are very important habitats that often support high densities of pygmy rabbit, sage sparrow, etc. NDOW also supports (as in the Montana Mountains) band-aid fencing projects of riparian or stringer meadow areas rather than an integrated hard look at livestock impacts. For sage-grouse in Nevada to be an umbrella species, NDOW needs to start sticking up for wildlife values, and not taking the easy route out by endorsing projects that alter sagebrush, destroy it in the process of a general purging of trees, or that serve to shift and intensify harmful livestock	NVCA	BLM	emc0411GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	impacts in other areas as the agency currently is doing.			
76.	The NDOW paper mentions the 35-100 years for possible recovery of mountain big sagebrush communities, It does not mention the much longer sagebrush community return intervals for low sagebrush, black sagebrush, and Wyoming big sagebrush i.e. intervals of 100-200 years or more. It is critical to state this as it shows how very long it will take for full recovery, and highlights the critical importance of taking the best possible care of remaining unburned sagebrush communities. It also shows that mitigation is often not possible.	NVCA	Both	emc0411GB
77.	NDOW makes assumptions about understory recover – but fails to consider recovery of understories if passive restoration was allowed to occur, and livestock grazing disturbance and impacts were removed. It is not acceptable for agencies assume that the only way to "improve" conditions is to radically alter, reduce and kill sagebrush. Removal of livestock provides for passive recovery, helps prevent cheatgrass and weed increase and expansion, and helps protect structural integrity of sagebrush that ids in providing winter habitat as well as nesting cover.	NVCA	Both	emc0411GB
78.	We are glad to see NDOW admit that understory composition is difficult to identify using ESI and soil survey info, and "the accuracy of the R-1 and R-2 classifications was variable. We are very concerned that NDOW will support federal agencies writing off habitat because it does not contain ideal nesting characteristics but may be important in winter, and be the best remaining nesting habitat, or receive significantly less livestock disturbance during nesting, all of which may serve to make these sites very important habitats of high concern.	NVCA	Both	emc0411GB
79.	We support the idea of linking management of ecological processes to improved long-term quality and abundance of sage-grouse habitat. To that end we propose that BLM and USFS begin their National Sage-Grouse Planning Strategy by assembling state-and-transition models that broadly describe sage-grouse habitat, and the ecological and management factors which influence change. This need not be an overly detailed exercise; for example, a generalized model for Wyoming big sagebrush would be pertinent to tens of millions of acres of sagegrouse habitat. These generalized efforts could then be linked to more specific models at state and local levels that would serve as working blueprints to promote actions which cause plant communities to move in a direction consistent with sage-grouse habitat management objectives. We have appended a list of references which we feel encapsulate the breadth of what we know, don't know, and need to know regarding the ecology and management of sagegrouse habitat throughout the range of the species. These references (and references cited therein) could be used as building blocks to construct and/or reinforce an ecologically-based approach to management of sage-grouse habitat that recognizes both the complexity of ecosystem challenges as well as opportunities for iterative improvement of sage-grouse habitat resources.	OR	Both	emc0192GB
80.	In Figure 1 we depict management issues impacting Oregon sage-grouse habitat along a continuum from low to high elevation. From this figure we can begin to construct management priorities. The first priority is to avoid state-level changes in acceptable habitat (i.e., habitat "conservation"), given that this is generally the most cost effective, highest probability management approach. The second priority would be to restore non-intact plant communities.	OR	Both	emc0192GB
81.	Of those plant communities in need of restorative treatment, the higher elevation mountain big sagebrush plant communities are generally the most productive expenditure of logistical and capitol resources. This is because these systems have relatively high resource inputs (i.e., precipitation) and are thus more resilient (i.e., more likely to return to a	OR	Both	emc0192GB

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	desirable state with a given amount of management input).			
82.	In lower elevation sagebrush plant communities, the dominant restoration problem is that of invasion by non-native annual grasses such as cheatgrass. Once these species reach a threshold level of abundance, change back to a more desirable state is difficult because a) annual grasses promote increased fire frequency that is not conducive to maintenance of perennial vegetation and b) our ability to establish desired perennial vegetation from seed is severely limited at present. Restoration in low elevation annual grass-invaded sagebrush plant communities is most limited by a lack of knowledge regarding proper restoration techniques for re–establishing desired perennial vegetation, as opposed to capitol limitations at higher elevations	OR	Both	emc0192GB
83.	The take-home point in the above discussion is that invasion of exotic annual grasses and encroachment of juniper represent the largest threats to sage-grouse habitat in Oregon (Hagen 2011).	OR	Both	emc0192GB
84.	While management options exist for juniper-dominated sites, annual-dominated plant communities are nearly impossible to restore with current restoration technologies. Thus, preventing transition to annual grassdominated states should be a high management priority in Wyoming big sagebrush habitats.	OR	Both	emc0192GB
85.	The Oregon sage-grouse strategy (Hagen 2011) broadly classifies suitability of potential sagegrouse habitat based on canopy cover of sagebrush and, to a lesser extent, associated understory herbaceous vegetation. Using this system, habitat with < 5% sagebrush canopy Shrubs Forbs Perennial grasses Some annual grasses Shrubs Forbs Perennial grasses Annual grasses Annual grasses only Shrubs Forbs Perennial grasses Annual grasses A B C D t3 t2 t1 t4 t5 t6 t7 t8 t1 = Periodic fire t2 = Seeding or transplant of desirable shrub species t3 = Lack of fire over time with sufficient seed source for shrub population expansion t4 = Increased fire t5 = Use of fire to create bare ground for application of pre-emergent herbicide followed by seeding of desirable perennial grasses and forbs t6 = Fire t7 = Abusive grazing t8 = Mechanical shrub reduction with seeding of desirable grasses and forbs 5 cover is considered non-habitat and areas with > 5% sagebrush cover are considered sagegrouse habitat. Within the "habitat" category, year-round habitat is characterized by a complex vegetation structure, while those sites with less diverse structure can be thought of seasonal habitat. Applying this concept to Figure 2, state "C" is non-habitat, state "A" is year-round habitat, and states "B" and "D" are seasonal habitat (e.g., State B may provide habitat for brooding and nesting but lacks sufficient sagebrush cover for winter habitat, while state D may lack sufficient herbaceous cover for nesting and brooding but provides ample sagebrush for winter habitat). While Figure 2 applies specifically to low elevation Wyoming big sagebrush plant communities, a similar technique could be used to model vegetation dynamics and management actions in higher elevations communities. The acceptable landscape-scale ratio of suitable habitat (which includes both year-round habitat and seasonal habitat) to non-suitable habitat has been addressed via the State-level planning effort in the Oregon sage-grouse strategy (Hagen 2011).	OR	Both	emc0192GB
86.	Hard winters are a fact of life. There are times that the snow is so deep there is no protection from predators for the sage grouse. The sagebrush in several areas of the state is not tall but will protect sage grouse during most normal winters.	WY	Both	emc0050RM
87.	BLM's indirect effects section should consider impacts and benefits to other sagedependent species The decline of the greater sage-grouse is just one symptom of a much larger problem – the decline of the sagebrush ecosystem. Sage-grouse is just one of many species that uses the sagebrush habitat and it has been used an indicator species of sagebrush ecosystem	WY	BLM	emc0129RM

Table C-8.C
Comments Related to the Vegetation on the Sagebrush Steppe

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	health. See, e.g. Steven E. Hanser and Steven T. Knick, Greater Sage-Grouse as an Umbrella Species for Shrubland Passerine Birds: a Multiscale Assessment, ECOLOGY AND CONSERVATION OF GREATER SAGE-GROUSE: A LANDSCAPE SPECIES AND ITS HABITATS, USGS, Nov. 2009, at 18: ("Management to benefit Greater Sage-Grouse may benefit the broader community of birds that use sagebrush steppe habitats"). Sagebrush ecosystem conservation may also benefit sage-dependent large game like pronghorn and mule deer. BLM should disclose the indirect benefits (or impacts) of its proposed action and alternatives on other species and the sagebrush ecosystem itself.			
88.	1) Manage vegetative communities to provide for nesting and early brood rearing, late brood rearing and winter habitat. Conduct landscape-scale analysis when evaluating sagebrush habitat for management needs and potential treatments.	WY	USFS	emc0144RM
89.	6) Promote healthy sagebrush communities with native species diversity.	WY	USFS	emc0144RM
90.	7) Restore degraded or disturbed sites to native vegetation including sagebrush and native forbs.	WY	USFS	emc0144RM
91.	Doherty et al. (2008) found that sage grouse in the Powder River Basin selected sagebrush stands that were large and unfragmented by development, on gentle topography. Additionally, sage grouse use stands of taller sagebrush, as sagebrush that protrudes above the snow is the key winter food source. Such stands of taller sagebrush are often viewed as "decadent" by range managers and targeted for sagebrush "control" projects. Doherty et al. (2008) concluded, "As remaining winter habitats are developed, and sage-grouse can no longer avoid CBNG, it is unclear whether birds will be able to adapt to a disturbance of this magnitude."	WY	Both	emc0343GB
92.	We are concerned that many, if not most, of these projects are actually harming sage grouse habitat in the long term and that the remainder will cause short-term impacts to sage grouse populations that contribute to the multiple serious threats to their existence. The scientific basis for many such projects (which include prescribed burns and mechanical or herbicidal thinning or removal of sagebrush) is extremely shaky, and given the lack of familiarity of the project proponents with basic sage grouse habitat requirements, such projects may unintentionally cause additional damage to sage grouse habitats. The impacts of such projects are starting to be rigorously tested, and in general they have been found to have long-term negative consequences for sage grouse. Holloran and Belinda (2009) was able to document negative impacts of sagebrush removal projects in the Bighorn Basin at very low levels of disturbance (less than 3.5% of the overall landscape). According to Rhodes et al. (2010), prescribed fire results in a loss of sagebrush cover, but also an increase in perennial grasses and invasive forbs, while native forbs did not increase in yield or nutritional value as a result of burns. Beck et al. (2009) found that some important features of sage grouse habitat did not recover to pre-burn levels even after 14 years post-fire. Beck et al. (2011) surveyed a number of rigorous tests of the effects of prescribed fire on sage grouse habitats, and recommended against burning in Wyoming big sagebrush habitats and observed that only limited short-term value in burning mountain big sagebrush. "In particular," concluded these researchers, "prescribed burning leads to a pronounced negative response in sagebrush cover that lasts for at least a few decades." Rhodes et al. (2010) concluded, "prescribed fire will not improve habitat characteristics for sage-grouse in Wyoming big sagebrush steppe where the community consists of shrubs, native grasses, and native forbs."	WY	Both	emc0343GB
93.	In Wyoming, Wyoming big sagebrush dominates the vast majority of sage grouse habitat throughout the state, both in the Wyoming Basins Ecoregion and on the Great Plains. Natural fire return intervals in Wyoming big sagebrush average	WY	Both	emc0343GB

Table C-8.C
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	100-240 years (Baker 2007). Wyoming big sagebrush recovers slowly after fires, which typically result in 100% sagebrush mortality; recovery to pre-fire canopy cover takes over 100 years (Cooper et al. 2007). Baker (2007) examined the same issue and projected that Wyoming big sagebrush recovery following fire ranges from 50 – 120 years; for mountain big sagebrush, the recovery period was estimated at 35 – 100 years. Prescribed fire can result in a loss of sagebrush dominance for 25-45 years, and may also result in increased erosion (Sedgwick 2004). Cooper et al. (2007) projected the full recovery of Wyoming big sagebrush canopy cover would take 625 years based on their observed recovery rates following prescribed fire (a biologically improbable outcome), and no recovery at all was recorded following prescribed fire on 17 of 24 sites. Close proximity to seed sources and moister conditions did not accelerate recovery in this study. These researchers concluded, "Wyoming big sagebrush recovery takes so long that managers considering prescriptive burns need to have a long-term view of the landscape before eliminating a sagebrush habitat that will not return for at least a century" (Cooper et al. 2007:12).			

Table C-8.D
Comments Related to Special Status Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Please use range ecology science for restoring healthy native sagebrush and healthy native species understory rangewide!	All	Both	cfc0022GB
2.	Professional opinion is inadequate and should not serve as a substitute for intensive site investigations leaving BLM with an arbitrary decision. Wyoming big sage communities and other sagebrush species vary in ecological potential due to moisture and soil differences in Oregon and the western regions. Allotments and pastures are a mosaic of sites located at different elevations on varying ecological surfaces. One size fits all prescriptions do not work and consideration of the variability of different areas should be identified.	All	Both	emc0179GB
3.	The EIS and alternatives must analyze documented trends in pinion and juniper (PJ) succession on rangelands and sage grouse habitat including proposed measures to reduce aerial PJ extent and future migration. The EIS must also evaluate the impacts such efforts may have on other species of concern.	All	Both	emc0310GB
4.	Sage-grouse populations are dependent upon healthy sagebrush ecosystems. Reclaiming or recovering sagebrush habitats is extremely challenging. The BLM and FS should direct efforts toward improving our ability to effectively reclaim degraded habitat, which requires gathering site-specific baseline (pretreatment) data to adequately evaluate success. Reclamation should be a mandatory stipulation for all development in sage-grouse habitat and managers must recognize that methods for achieving success vary by region and are site-specific. Reclamation efforts should be monitored and results maintained in a single database to improve public understanding and effectiveness of efforts. The agencies should establish a process to identify and address failed reclamation projects.	All	Both	emc0329GB
5.	I definitely support protection of endangered or threatened plants and animals over domestic grazing. BLM land is for all citizens and should be managed primarily for ITS HEALTH.	All	Both	fld0007rm, fld0007gb
6.	monitoring of sage grouse and sagebrush habitats: Monitoring is critical to assess whether public uses are meeting required population and habitat objectives, including those for Sage Grouse, whether restoration projects are effective or not and even whether our conservation efforts or objectives are adequate or should be changed. Yet, it is unclear how much monitoring is actually being conducted annually by the federal agencies on public lands and national forests. We know that state wildlife agencies conduct annual lek counts and wing collections after hunting seasons to assess population trends and Sage Grouse distributions, which may fluctuate annually due to weather and other factors and may be subject to cyclic influences. On the other hand, habitat status also fluctuates annually due to wildfires and weed invasions, grazing impacts, development impacts and over the long term due to successful rehabilitation and restoration projects. Unfortunately, monitoring is the first thing eliminated due to inadequate agencies' budgets. And, if not done and done properly, the lack of monitoring results in the waste of habitat restoration funds and the undercutting of the agencies' Sage Grouse conservation strategies. The EIS should discuss how required agencies' monitoring can be accomplished and be reported effectively to the public every year. a. the agencies should acknowledge that monitoring does not simply consist of counting numbers of Sage Grouse projects, dollars spent, acres treated, with no quantification of benefits to Sage Grouse or priority habitats. b. the agencies should use monitoring to objectively evaluate the effectiveness of conservation measures and projects, both positive and negative. c. the agencies should use adaptive management to more closely match habitat improvement projects to projects which successfully meet population and habitat restoration objectives. d. the agencies' required monitoring should track sagebrush cover and maturity and the preservation of key seasonal habitats, including: 1. how did the plant communities respond 2. how response relates to structural and other habitat requirements 3. how Sage Grouse populations	NVCA	Both	emc0283GB

Table C-8.D
Comments Related to Special Status Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	respond 4. the collection of quantitative data over time required for substantial changes e. the agencies should require monitoring of projects both for site-specific results as well as PMU or regional results. F. the agencies should coordinate with state wildlife agencies to monitor responses of Sage Grouse populations and trends to habitat restoration projects. G. the agencies' should disclose in the EIS that funding for monitoring is not assured as it is subject to annual agencies' budgets.			
7.	We are very concerned about the following statement: PGH provides some benefit to greater sage-grouse populations but, in many instances, lacks a key component, such as adequate shrub height or density or sufficient herbaceous understory In fact, nearly all the lands in many Priority Habitat sagebrush communities. For example, vast areas of all the PMUs in northeastern Nevada (Gollaher, Snake, O'Neil, North Fork, Tuscarora, Desert for example. If agencies are going to make this claim – which has long been an excuse used by Ely BLM and others to manipulate, alter, fragment and destroy sagebrush habitats critical to pygmy rabbit, sage sparrow loggerhead shrike, and sage-grouse, then all the data used in making these determinations in the mapping must be provided. Under this description,lands where Ely BLM treated by crushing and mowing sagebrush thus greatly reducing shrub cover would not be found suitable. Nor would the large areas of Elko BLM lands with a large amount of cheatgrass in the understory - such as in the Salmon River or Owyhee allotments that are mapped as being Priority habitat. There seems to be a high degree of bias and arbitrariness in how this was applied. Plus what this seems most aimed at is promoting massive treatment alteration and destruction of the expanses of intact little-weeded Wyoming big sagebrush communities that have good microbiotic crusts, but may have less grass/forbs than the idealized NRCS description. We are concerned that this description is being used to sacrifice occupied habitats to unlimited new industrial development as well as a likely battery of forage/fuels "treatments	NVCA	Both	emc0411GB
8.	Even though the various R Habitat category values are described, NDOW later admits: Therefore, R-3 landscape patches should be evaluated on a case by case basis to determine the true potential for meeting future sage-grouse needs. A key component of high quality sage-grouse habitat is the understory composition of sagebrush communities (Connelly et. al. 2000). The R-value mapping effort attempted to identify understory quality using the existing vegetation cover and the ecological site potential identified in the United States Department of Agriculture soil surveys. However, over the course of this project, it was determined the accuracy of the R-0 vs. R-2 classifications was variable. Further refinement of the Sage-Grouse Map should include a more robust method for determining sagebrush understory composition and quality.Burned areas often dramatically alter the quality and composition of the landscape Where are the mature or old growth sagebrush communities in occupied sage-grouse habitat that are placed in this category? These are communities that in periods of extreme winter weather may be essential for sage-grouse survival. They are also critical to a host of other rare and declining wildlife species.	NVCA	Both	emc0411GB

Table C-8.E Comments Related to Forestry

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	As usual the BLM and USFS will propose an alternative to "remove encroaching conifer trees on sage-grouse habitat." The strategy must not include commercial logging. There are thousands of square miles of suitable habitat. The USFS thinks all ecosystem problems (real or concocted) can best be solved by commercial logging.	All	Both	emc0016GB
2.	OFS is concerned that protection measures could severely limit the ability of farmers and foresters to effectively manage their lands.	All	Both	emc0221GB

Table C-8.F
Comments Related to Wetland and Riparian Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Water can be a critical factor in determining the abundance and distribution of wildlife, especially in arid western ecosystems; although the impacts vary by species, habitat, and season. Over the past 150 years, the availability and distribution of water have been drastically altered by both natural processes and human actions. By some estimates, 95 percent of natural riparian ecosystems (those associated with water features) and wetlands in the arid West already have been degraded or lost. We believe the loss of natural water resources threatens Greater Sage-Grouse population viability, but we realize domestic livestock also require water to survive. Federal public-land managers and ranchers have improved existing water supplies and developed new water systems for livestock and wildlife. Hundreds-of-thousands of these water developments are scattered across the western U.S. Water developments increasingly replace or augment diminishing natural sources in many areas and have become crucial for many species, especially Greater SageGrouse when stressed by drought, high temperatures or rearing young. These water sources and associated moist-soil (riparian) habitats are critical for Greater Sage-Grouse survival and reproduction. Springs, wetlands, seeps, wet meadows, bogs, fens, ephemeral and permanent streams, rivers, ponds, stock tanks and lakes all serve as or are surrounded by crucial habitats for Greater Sage-Grouse and other wildlife in the arid West. We believe that all water sources and associated moist-soil habitats on federal public lands should be protected from the effects of livestock disturbance and grazing. In most cases, livestock drinking water can be transported away from water sources and riparian habitats to sites that are not in limited supply and that are more compatible with livestock disturbance and grazing.	All	Both	emc0074GB
2.	Recommendation #3 - We recommend that the BLM and USFS require all administrative units to protect all water sources and associated moist-soil (riparian) habitats from the effects of domestic livestock disturbances and grazing on federal public lands under their prevue.	All	Both	emc0074GB
3.	Although livestock grazing is the highest and best use for much BLM land, many areas of public land managed by BLM grazing land could easily be better managed for wildlife. On some BLM land, decades of livestock use has continued to depress game habitat as clearly evidenced by adjacent right of way and sometimes adjacent private land sagebrush, greasewood, and habitat cover. Habit studies have rarely appeared to change actual use. Certainly cost feasibility prohibits fencing off or separating many small areas of riparian or other critical habitat. However, many areas exist where habit can be significantly protected without major effects on livestock permit numbers and, in considering minimal grazing fees, certainly without significantly impacting income from public lands. I also believe that through the years the oversight and field reviews by range staff has varied greatly between different BLM areas.	All	Both	emc0082RM
4.	Although any increase in grazing costs will meet with objections, a moderate raise is so long overdue that it is difficult to imaging a sound basis for continued objection. Better care of public high wildlife habitat value and riparian areas including some additional fence and water development with emphasis on wildlife habitat will also encounter some objections. Although I believe that sage grouse numbers remain well above the threshold of endangerment or seriously threatened species and will remain so, the simple suggestion alone that such designation is possible should be a great embarrassment to an agency trusted with management of the public's lands. It is time for simple and logical management adjustments, not studies.	All	Both	emc0082RM
5.	PFC surveys are also qualitative assessments conducted to determine how well streams are functioning or not functioning under a 25 year storm event. PFC is not a replacement for a measured, data intensive inventory, but is an appropriate starting	All	Both	emc0159GB

Table C-8.F
Comments Related to Wetland and Riparian Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	point for determining and prioritizing the type and location of quantitative inventory or monitoring necessary (TR 1737---9, 1993). Both the PFC and SRH assessments should be reviewed as part of the BLM information for the EIS. Some PFC surveys are not up to date and may need to be assessed by experienced and trained personnel. PFC cannot act as a surrogate for the SRH watershed criteria (Wyman 1999, Prichard et. al 1998).			
6.	PFC surveys are also qualitative assessments conducted to determine how well streams are functioning or not functioning under a 25 year storm event. PFC is not a replacement for a measured, data intensive inventory, but is an appropriate starting point for determining and prioritizing the type and location of quantitative inventory or monitoring necessary (TR 1737---9, 1993). Both the PFC and SRH assessments should be reviewed as part of the BLM information for the EIS. Some PFC surveys are not up to date and may need to be assessed by experienced and trained personnel. PFC cannot act as a surrogate for the SRH watershed criteria (Wyman 1999, Prichard et. al 1998).	All	Both	emc0179GB
7.	PFC surveys are also qualitative assessments conducted to determine how well streams are functioning or not functioning under a 25 year storm event. PFC is not a replacement for a measured, data intensive inventory, but is an appropriate starting point for determining and prioritizing the type and location of quantitative inventory or monitoring necessary (TR 1737---9, 1993). Both the PFC and SRH assessments should be reviewed as part of the BLM information for the EIS. Some PFC surveys are not up to date and may need to be assessed by experienced and trained personnel. PFC cannot act as a surrogate for the SRH watershed criteria (Wyman 1999, Prichard et. Al 1998).	All	Both	emc0179GB
8.	PFC surveys are also qualitative assessments conducted to determine how well streams are functioning or not functioning under a 25 year storm event. PFC is not a replacement for a measured, data intensive inventory, but is an appropriate starting point for determining and prioritizing the type and location of quantitative inventory or monitoring necessary (TR 1737---9, 1993). Both the PFC and SRH assessments should be reviewed as part of the BLM information for the EIS. Some PFC surveys are not up to date and may need to be assessed by experienced and trained personnel. PFC cannot act as a surrogate for the SRH watershed criteria (Wyman 1999, Prichard et. al 1998).	All	Both	emc0209GB
9.	Please consider giving priority to restoring riparian habitats where this species lives from the overgrazing of livestock	All	Both	emc0219GB
10.	PFC surveys are also qualitative assessments conducted to determine how well streams are functioning or not functioning under a 25 year storm event. PFC is not a replacement for a measured, data intensive inventory, but is an appropriate starting point for determining and prioritizing the type and location of quantitative inventory or monitoring necessary (TR 1737---9, 1993). Both the PFC and SRH assessments should be reviewed as part of the BLM information for the EIS. Some PFC surveys are not up to date and may need to be assessed by experienced and trained personnel. PFC cannot act as a surrogate for the SRH watershed criteria (Wyman 1999, Prichard et. al 1998).	All	Both	emc0222GB
11.	At page 16, Riparian Areas and Wet Meadows, managing for proper functioning condition of these sites within sage-grouse priority habitats should include grazing. As indicated above, grazing of meadows improves the nutrition of the forbs used by sage-grouse and sage-grouse demonstrate a preference for grazed versus ungrazed meadows. This needs ot be included in the EIS analysis.	All	Both	emc0239GB
12.	The trend in water developments is to convey the water away from the spring area so that livestock will not congregate in the area of saturated soil, and also to return overflow to the spring drainage. These types of water developments are benefit	All	Both	emc0239GB

Table C-8.F
Comments Related to Wetland and Riparian Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	to sage-grouse by maintaining the riparian vegetation, and avoiding the trampling effects of livestock on wet spring meadows. Therefore, such water developments should be encouraged, not restricted.			
13.	Development of springs and alternative water sources is essential to creating habitats for the sagegrouse that will be protected and long lasting. Coupled with the increased grazing, sagegrouse would then have the opportunity to flourish in these revitalized riparian areas.	All	Both	emc0241GB
14.	Limiting ranchers' ability to develop water sources for fear of increasing mosquitos that might carry West Nile is counteractive to increasing sage grouse numbers. Lifting restrictions and allowing ranchers to develop water sources, fence and protect meadows, and allowing regulated shooting of the raven would help boost sage grouse numbers.	All	Both	emc0244GB
15.	Fenced riparian seems a obvious negative factor to sage grouse health with its old decadent growth eliminating fresh green growth that the grouse thrive on. Non use is also a negative for them.	All	Both	emc0253GB
16.	We have found that by implementing multi-pasture grazing systems, having 5-15 pastures per herd, large herds, large pastures, allowing adequateperiods for plant recovery (generally 12 or more months) and providing season long rest toapproximately 20% of pastures annually we see increased upland and riparian herbaceous vegetation and decreased bare ground while maintaining a healthy brush component (Danvir 2002, Danvir et al 2005).	All	Both	emc0281GB
17.	The dry conditions on our mountains the past years have allowed sagebrush to squeeze into the tiny wet meadows where the hens take their young chicks to forage. These small wet meadows need some help in stopping sagebrush encroachment. Another recent impact that is happening to these wet meadows, especially, on Blue Mt. is that there has been an explosion of elk numbers and their uncontrolled grazing is having an impact on these wet areas.	All	Both	emc0295GB
18.	At page 16, Riparian Areas and Wet Meadows, managing for proper functioning condition of these sites within sage-grouse priority habitats should include grazing. As indicated above, grazing of meadows improves the nutrition of the forbs used by sage-grouse and sage-grouse demonstrate a preference for grazed versus ungrazed meadows. This needs to be included in the EIS analysis.	All	Both	emc0322GB
19.	The potential conflict between livestock grazing and sage grouse intensifies near water sources due to the importance of these areas to sage grouse, particularly during early brood rearing. Heavy cattle grazing near springs, seeps, and riparian areas can remove grasses used for cover by grouse (Klebenow 1982). According to Call and Maser (1985:17), "rapid removal of forbs by livestock on spring or summer ranges may have a substantial adverse impact on young grouse, especially where forbs are already scarce."	All	Both	emc0343GB
20.	Riparian management. Issue: Many riparian areas fail to meet habitat conditions that sage-grouse require. Issue: There is a lack of appropriate standards and guidelines to restore habitat to reference conditions. Issue: Existing methods used to assess riparian areas (lentic and lotic) fail to include habitat requirements for sage-grouse. Issue: Reference riparian areas required in most agency assessments are too few and often too small in size to provide a basis for comparison.	All	Both	emc0391GB
21.	Wetlands and riparian areas, including the upland habitat and groundwater resources required to protect the integrity of seeps, springs, streams or wetlands;	All	Both	emc0407GB
22.	Reduce livestock grazing in order to restore the grasses and other flowering plants that sage grouse need. Give priority to restoring riparian areas from overgrazing.	All	Both	flf0000gb flf0000rm

Table C-8.F
Comments Related to Wetland and Riparian Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
23.	The loss of riparian areas due to the restriction of grazing in wet meadows and lack of hot season grazing in upland areas has led to rangeland conditions that are unfavorable sagegrouse habitat.	All	Both	flj0003gb
24.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations. Private land productivity, particularly wet meadow maintenance, is extremely important to sagegrouse survivability.	All	Both	flj0003gb
25.	Water Resources As alternatives are developed, we encourage the inclusion of measures which conserve, enhance and restore riparian areas and wetlands. Also, because of the aridity of greater sage-grouse habitat, we recommend that the EISs analyze potential impacts to ephemeral water bodies.	All	Both	rmc0020RM
26.	It has also been shown that increased use of meadows and riparian areas in mid-to late summer is common as herbaceous vegetation in upland habitat becomes desiccated. Potential for competition with Sage-Grouse young may be in proportion to the extent to which cattle select mesic/moist sites that are preferred foraging areas. Young birds seek out insects and succulent forbs in these habitats. Although the adult diet switches to forbs and insects in addition to sagebrush, developing young depend heavily upon insects for food. These habitats are critical brood-rearing and summer use areas in regions with low annual rainfall and during drought years.	All	Both	rmc0024GB
27.	Limit grazing in riparian areas. During low precipitation years, livestock should not be in riparian areas.	All	Both	rmc0024GB
28.	(a) Riparian Zones- Past efforts to fence and protect riparian areas have resulted in drastic changes in vegetation. Some areas have been converted to shrub zones from meadows. Long periods of rest had resulted in rank growth of grass and shrubs. This stagnant mix may favor some species; however Sage Grouse seek out riparian zones where fresh young green vegetation is available. Management of riparian zones needs to include "sage grouse preference" where sage grouse exist.	All	Both	rmc0057GB
29.	i. Lander, WY RMP Alternative B addresses the important protection of natural functions in riparian-wetland areas, providing important benefits to sage-grouse. In the arid western states, the value of riparian wetland communities is inversely proportional to their physical extent - supporting the greatest diversity of plant and animal life of all habitat types (DEIS 343, DEIS 351). Actions that improve riparian-wetlands would improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects. Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Alternative B prohibits surface disturbing activities within 1,320 feet (0.25 mile) of surface water, riparian-wetland areas, playas, and 100- year floodplains where mapped (except for areas of high and moderate oil and gas potential), and provides important protections for this habitat type.	East	Both	emc0089RM
30.	i. Lander, WY RMP Alternative B stipulates light livestock grazing levels in areas typically preferred by cattle, such as riparian-wetland areas, adjacent upland areas, and around salt and mineral supplements and water troughs and developments. Also, Alternative B prohibits salt or mineral supplements within 0.5 mile of riparian-wetland habitats to prevent livestock congregation at water sources. Alternative B prohibits the placement of salt or mineral supplements within 0.6 mile of greater sage-grouse leks. All these provisions would protect important sage-grouse habitats (foraging areas, breeding areas, nesting areas) from livestock trampling and the impacts of heavy plant utilization.	East	Both	emc0089RM

Table C-8.F
Comments Related to Wetland and Riparian Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
31.	We question whether the only criteria for new water development of springs and seeps should be if sagegrouse habitat benefits from the development. These developments could be neutral for sage-grouse but benefit other land uses (livestock, other wildlife, recreation) but not harm sage-grouse. Actions that have no adverse effect upon sage-grouse should not be prohibited solely because they do not provide a positive benefit.	GB	Both	rmc0076gb
32.	In a cottonwood grove survey of the upper Missouri River, Kudray et al. (2004) compared cattle-inaccessible river islands with accessible cottonwood groves on similar sites. They found no correlation between accessibility and any of their ecological measures. In other words, their analysis of the data supports the hypothesis that current grazing practices have no effect on riparian vegetation. The study devotes many paragraphs to the hypothesis that cattle are responsible for a decline of red-osier dogwood and chokecherry along the Missouri River. Because the study measured these species only once, it is not possible for it to reveal whether these species are increasing or declining. Furthermore, the experiment that was performed indicated that cattle did no harm. Why did the authors devote paragraphs to this hypothesis but only one sentence to the actual results of their experiment? Because they were trained to believe that cattle harm riparian ecosystems. A more careful analysis of the data might have noted that all the cattle-inaccessible river islands had 90% non-native herb cover, while some of the cattle-accessible sites were much better. But the idea that cattle could be benefiting native plants apparently did not occur to these researchers.	MT-RM	Both	emc0013RM
33.	The Nevada Wilderness Project respectfully requests that you address the impacts to sage--grouse and sage---grouse habitat caused by feral horses, including removal of vegetational cover necessary for nesting and brood---rearing, changes to vegetational composition that results from feral horse use, horse impacts to springs and other important free water sources utilized by sage-grouse, possible disturbance caused by feral horses during the nesting period, infrastructure used to mitigate horse impacts (e.g., fences) and how it may negatively affect sage-grouse, any connection to West Nile Virus as that disease is recognized as affecting both horses and sage-grouse, and the potential for feral horse management actions to negatively affect sage-grouse and sage-grouse habitat.	NVCA	Both	emc0243GB
34.	Interestingly, Barrick's ranches may provide unique opportunities for mitigation of impacts from its mining operations. As operating ranches, these off-site restoration opportunities, including restoration of habitat on fee land, would likely be unavailable without their connection to the mining operations. Creating new riparian vegetation or wetlands to mitigate for potentially impacted wetlands, improving degraded habitats to replace impacted areas, and developing water sources when access to water is prevented due to safety fencing are just a few examples of off-site mitigation that potentially could be available on Barrick's ranch lands.	NVCA	Both	emc0277GB
35.	Manage riparian areas and wet meadows for proper functioning conditions within priority sage grouse habitats - Within priority and general sage-grouse habitats, manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., reference state) to facilitate brood rearing. Also conserve or enhance these wet meadow complexes to maintain or increase amount of edge and cover within that edge to minimize elevated mortality during the late brood rearing period (Hagen et al. 2007, Kolada et al. 2009, Atamian et al. 2010). What will be the management technique used for this conservation measure? If fencing techniques are to be used in this instance, this measure needs to further assess the implications of fencing on greater sage-grouse.	NVCA	Both	emc0328GB

Table C-8.F
Comments Related to Wetland and Riparian Vegetation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
36.	Where riparian areas and wet meadows meet proper functioning condition, strive to attain reference state vegetation relative to the ecological site description. - For example: Within priority sage-grouse habitat, reduce hot season grazing on riparian and meadow complexes to promote recovery or maintenance of appropriate vegetation and water quality. Utilize fencing/herding techniques or seasonal use or livestock distribution changes to reduce pressure on riparian or wet meadow vegetation used by sage-grouse in the hot season (summer) (Aldridge and Brigham 2002, Crawford et al. 2004, Hagen et al. 2007). Properly functioning condition means the vegetation and water quality is already meeting standards and should not need further assessment.	NVCA	Both	emc0328GB
37.	Indeed wet meadows riparian areas are important – but how does NDOW reconcile a no net loss; policy with endorsing spring development/re-development and de-watering projects accompanied by band-aid piecemeal fencing? This only serves to further reduce flows at affected project sites, thus often reducing meadow areas as well as intensifying adverse impacts in all unfenced areas leading to further reductions there, as well. Examples: Hubbard Vinyard, where NDOW sided with livestock interests to support livestock water developments specifically to benefit one of its former Commissioners.	NVCA	Both	emc0411GB
38.	'Work to address and prevent overuse areas by managing for good livestock distribution'.(pg. 3 attachment 8). Part of good distribution of livestock is the availability of water in harder to access areas. Livestock will not walk any farther than necessary to reach water. All wells and other water resources such as develop springs and reservoirs placed away from natural riparian areas will help protect those riparian areas. Authorize new water development for diversion from spring or seep source only when priority sage-grouse habitat would benefit from the development(page 16 National) The more water available in a pasture the less use any one watering place will have and the less damage to sage grouse habitat in the area. There needs to be several areas of water available to prevent one part of a pasture from being overused.	WY	Both	emc0050RM
39.	i. Lander, WY RMP Alternative B addresses the important protection of natural functions in riparian-wetland areas, providing important benefits to sage-grouse. In the arid western states, the value of riparian wetland communities is inversely proportional to their physical extent - supporting the greatest diversity of plant and animal life of all habitat types (DEIS 343, DEIS 351). Actions that improve riparian-wetlands would improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects. Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Alternative B prohibits surface disturbing activities within 1,320 feet (0.25 mile) of surface water, riparian-wetland areas, playas, and 100- year floodplains where mapped (except for areas of high and moderate oil and gas potential), and provides important protections for this habitat type.	WY	Both	emc0089RM
40.	i. Lander, WY RMP Alternative B stipulates light livestock grazing levels in areas typically preferred by cattle, such as riparian-wetland areas, adjacent upland areas, and around salt and mineral supplements and water troughs and developments. Also, Alternative B prohibits salt or mineral supplements within 0.5 mile of riparian-wetland habitats to prevent livestock congregation at water sources. Alternative B prohibits the placement of salt or mineral supplements within 0.6 mile of greater sage-grouse leks. All these provisions would protect important sage-grouse habitats (foraging areas, breeding areas, nesting areas) from livestock trampling and the impacts of heavy plant utilization.	WY	Both	emc0089RM

Table C-9.A
Comments Related to Travel Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	I do not support closures Rds. as this will allow an increase in predators.	All	Both	cfc0007GB
2.	3% disturbance is a lot, especially considering the past 14 years. 10% would be more realistic. No more than 1 disturbance per section is not realistic either due to changing landscapes. There should be mitigation allowances made. Erusting used roads and large/medium reservoirs should not be counted.	All	Both	cfc0025RM
3.	Avid ATVer - I'm ok with nesting closure times for a few weeks - total closure would just beg non-compliance with fellow riders.	All	Both	cfc0057GB
4.	I would hope that recreational horseback riding on established trails through the habitat would be a permitted use. Anything to the contrary would have to be based on a lot of good science.	All	Both	emc0002RM
5.	1) Since BLM maintains more than half of the available sage grouse habitat, the strongest possible protections should be made available without hesitation. Especially restrictions from access by motor vehicles into sage grouse habitat. Off highway vehicles, including ATV's, motorcycles, and four-wheel drive automobiles cause extensive damage to BLM Lands. This is obvious upon visiting any BLM controlled lands. Roads also are the root cause of the habitat fragmentation, which starts the decline of the sage grouse.	All	BLM	emc0011GB
6.	In 2008-2009 leks were cut in half, agriculture caused reductions in leks as did a lot of roads. Sage-grouse were found to be half as likely to maintain their nests in Silver Sage as in Big Sage. North Dakota saw a tremendous drop in bird populations.	All	Both	emc0012RM
7.	Each proposed conservation measure in the EIS should be analyzed in terms of how much it costs and how much the grouse population will benefit. The following conservations measures should be included in this analysis: - Various methods of coyote control. - Various methods of raptor control. - Various methods to reduce danger from fences. - Various methods to reduce danger from vehicle traffic. - Various methods to protect grouse from disease. - Various methods to limit exposure to pesticides. Each method should be rated according to two measures: 1. Number of grouse saved per dollar spent on materials and labor. 2. Number of grouse saved per laborer-hour of time spent. When considering these measures, the EIS should analyze costs from three different viewpoints: 1. When the BLM employs the person doing the labor; 2. When the BLM contracts with a third party to do the labor; 3. When the BLM encourages ranchers or other partners to perform the labor. Ranchers' time and BLM funds are limited. The RMP should focus on conservation measures that provide the highest return for the time and money invested.	All	Both	emc0013RM
8.	The RMP should include plans for a study of how roads impact winter forage opportunities for sage grouse. Specifically: Why do grouse like to congregate on gravel roads, and how would road closures negatively impact the species?	All	Both	emc0013RM
9.	The RMP should include plans for a study of how lek location correlates to roads.	All	Both	emc0013RM
10.	In areas where sage grouse currently thrive, the RMP should make no changes to current grazing, road use, and fire-suppression practices.	All	Both	emc0013RM
11.	We are loosing the sage-grouse species for one reason they are being killed by humans. Any effective strategy will reduce the opportunity for humans to harass and kill these birds. Roads should be closed to major sage-grouse habitat. Signs should be erected that discourage hunting. ORVs disturb the birds. The BLM and USFS should erect signs (and monitor use) that tell people ORV use is discouraged.	All	Both	emc0016GB

Table C-9.A
Comments Related to Travel Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
12.	In a recent book edited by S. T. Knick and J. W Conmelly on Sage-Grouse research it was stated that most attempts to restore sagebrush habitats have been unsuccessful. In fact a noted grouse expert, Dr. Clait E. Braun, stated, "I know of no areas where Sage-Grouse have re-established their distribution over significant areas of former habitat," (The Wilson Journal of Ornithology, Vol. 123, p 655). What this effort will require will be for you to put Sage-Grouse management above all other uses on public lands. This means that grazing of livestock and fences should be eliminated in core Sage-Grouse areas. All types of land fragmentation, such as roads, power lines, wind farms, oil and gas drilling, etc. will have to be secondary to the management of Sage-Grouse. I do not have much faith that your agencies will be capable of such a drastic turn-around. In fact, BLM planned to study ecological trends in much of the 260 million acre of the West's grazing allotments, but told the scientists not to consider livestock grazing, due to "anxiety from stakeholders." Such attitudes will absolutely have to change if there is any hope to save Sage-Grouse and their habitat. The only real solution that I see is buying out willing ranchers who graze in core Sage-Grouse areas. As said, both your agencies will have to put the grouse first.	All	Both	emc0021RM
13.	I do not believe motorcycles or atvs will have an affect on sage-grouse.	All	Both	emc0024GB
14.	As an outdoor enthusiast who lives in Idaho and hikes, hunts and rides ATV's, I ask that you don't close any roads or restrict access to anyone because of the Sage Grouse. In the last ten years or so there has been an increase in the number of BLM and U.S.F.S. roads that are being closed, all in the pretense of trying to protect some kind species that somebody claims is endangered. We have seen these tactics used with ground squirrels, caribou and now the sage grouse. The fact is, there is no real proof that vehicles kill or do real hard to these so called endangered species. All this is, is a ploy to restrict citizens from gaining access to their public lands.	All	Both	emc0036GB
15.	How does road density affect sage grouse lek function/occupancy and brood rearing success? 1) in areas with only lightly used, widely spaced recreational roads. 2) in areas with the routine movement of livestock using horses, ATVs, etc. 3) in areas with utility corridors and their maintenance (including unauthorized traffic) 4) in areas with oil and/or gas well development	All	Both	emc0041GB
16.	Why so many Predators? a) Between all the rules of the USFS, BLM, DOW, State, it has become so complex that hunters of predators can never assume he/she is adhering to the regulations of each group. In other words "Keep it simple". b) Fewer people hunt predators because: Roads have been closed or are planned to be closed. There is an anti-hunting attitude exuded by the above groups. Cost of hunting (Equipment, travel, fees) Older hunters (60+) find previous access methods unusable and current long walking is difficult so they quit. The DOW statistics will substantiate fewer hunters as the old guys are not mentoring new young kids.	All	Both	emc0052RM
17.	The sage grouse population is NOT impacted by grazing, current roads, or energy factors. (I never saw a cow kill a grouse).	All	Both	emc0052RM
18.	We also recommend developing guidelines for off-road vehicle use, to include seasonal or year-round bans on use in vital habitat.	All	Both	emc0068GB, emc0020rm
19.	With regards to roads around both priority and general Greater Sage Grouse habitats, no new roads or ROW's should be allowed or granted within a 5.5 mile radius of a lek site. With regards to priority habitats, the BLM should further	All	BLM	emc0074RM

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	include mandatory limited and or no usage of such roads that pass within a 5.5 mile radius of a lek site during mating and hatching seasons.			
20.	When considering the necessity for habitat preservation, all priority sites will be designated high priority and mandatorily set aside from any new or further oil and gas development, as well as road and other leasing development.	All	BLM	emc0074RM
21.	When considering the necessity for habitat preservation, all linkages between any site and a priority site will also be designated high priority and mandatorily set aside from any new or further oil and gas development, as well as road and other leasing development.	All	Both	emc0074RM
22.	When considering the necessity for habitat preservation, all general habitat sites will be designated medium priority sites, with a mandatory evaluation of their protection from oil and gas development, and road development, and other leasing development. It will be mandatory for the BLM to act upon new information provided regarding lek locations, regardless of their activity status, and to install protective measures in the middle of the finalized land usage plan. These measures will follow the regulations of all high priority, priority and general habitats, as well as mandatory exemptions from oil and gas development, road and other leasing developments as other Greater Sage Grouse habitats have undergone.	All	Both	emc0074RM
23.	The ODFW strategy does not address the full suite of threats to sage grouse, such as road densities. This Sage Grouse Conservation EIS must address opportunities to close and decommission little-used roads as a way to reduce fragmentation and improve sage grouse habitat quality.	All	Both	emc0078GB
24.	RECREATION ISSUE: The proposed Conservation Measures fail to address impacts of individual OHV trails and subsequent two-track roads that impact sage grouse and sage grouse habitat. Discrete anthropogenic disturbance via highways and gravel roads has been identified as an important issue for sage grouse habitat in the Conservation Measures. Overall objectives talk about limiting roads and specific objectives talk to limiting road disturbance to 3%. The Conservation Measures entirely overlook the impact of OHV trails left by individuals using public and USFS administered lands. Are these really to be categorized as diffuse disturbances, along with livestock grazing? Individual user OHV trails mechanically damage sagebrush, disturb nesting and brooding, destroy riparian vegetation and drain wet areas through capillary action. In lowmid elevation areas, OHV trails lace every drainage and ridgeline. Low elevation lands are a web of fragmented, small polygon areas that can't function as sage grouse habitat. Nearly every low-mid elevation riparian area in Nevada potentially used by sage grouse for brooding is impacted by individual use OHV trails on BLM lands and USFS administered lands. OHV trail mileage is expanding exponentially on BLM land. When use is controlled on USFS administered lands through "closed unless posted open" designations, OHV users come to BLM lands where everything is open except a few areas posted as closed. Seemingly harmless one-time passes through an area by OHV's go on to become full-blown roads in a few short months that are accessible to vehicles. Individual OHV trail / roads systems force the issue of discussion on patch size. The case can't be made that webs of OHV trails and two-track roads don't impact sage grouse and sage grouse habitat no matter which label, discrete or diffuse, these fall under. Measures must be amended into the LUPs that would manage OHV trail proliferation.	All	Both	emc0083GB
25.	RIGHTS of WAY ISSUE: The proposed Conservation Measures fail to address ROW maintenance roads becoming roads for the general public. Most low and mid-elevation powerline / gas line / communications line ROW's become	All	Both	emc0083GB

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	OHV trails and eventually roads for the general public. See discussion on individual OHV use under Travel and Transportation. The only mitigation available is signage stating that a maintenance road is closed to public travel; the signage is universally ignored. Because the Measures identified ROW's as potential discrete disturbances, the use of the ROW road by the individual public OHV user must also be a discrete disturbance.			
26.	One of the most effective management tools is suspension of road and ATV trail proliferation in the sage sea. This action alone would severely restrict the potential for new development of fossil, solar, and wind energy, all of which may have serious negative impacts on sage grouse. Stop the roads, stop the invasion of the sage sea. Then, when better habitat information is available, allow construction that is minimally invasive and located in minimum impact areas. There are other places to extract or generate energy, but sage grouse grow only here.	All	Both	emc0083RM
27.	Limits on road access do not necessarily reduce cattle grazing, and grazing reduces floristic diversity that supports sage grouse. In addition to road limitation, therefore, cattle grazing limitation is needed until areas of poor grouse habitat quality are identified, at which time grazing may be allowed or re-allowed in these areas. There are other places to grow cows, but sage grouse grow only here.	All	Both	emc0083RM
28.	Exclude offroad vehicles from BLM lands used as critical habitat by sage-grouse, including leks, nesting and rearing habitat, and winter habitat. BLM should consult ornithologists and wildlife biologists for recommendations on an effective distance from a lek that would prevent ORVs from interrupting breeding activities.	All	Both	emc0085GB, emc0029rm
29.	Due to the grouse's seasonal nesting habits and large habitat range, only if absolutely necessary should current/historic roads and trails be rerouted and/or considered for temporary/seasonal closures instead of permanent or blanket area closures.	All	Both	emc0114GB
30.	The OHV community understands that certain measures need to be taken to protect the Sage Grouse population, however the Agency (blm, usfs, etc) must not allow this action to be used as a means for unnecessary and unwarranted land closures and/or restrictions. The Agency must use sound science when considering measures to protect the species and not agenda-driven speculation.	All	Both	emc0115GB
31.	The OHV community is opposed to unnecessarily having the greater Sage Grouse population divided into sub species and/or separate groups in order to further an anti-access/anti land-use agenda. The Agency must use sound science when considering measures to protect the species.	All	Both	emc0115GB
32.	Should sound science dictate that land-use restrictions are necessary, the Agency must consider minimizing these restrictions when it is prudent to do so, including but not limited to seasonal/temporary closures instead of permanent closures and rerouting of routes/trails instead of unnecessary full closures.	All	Both	emc0115GB
33.	Off-Highway Vehicle Use: The BOA is opposed to unregulated OHV use. That being said the restrictions on OHV travel that prevents the firewood collector from departing the road more than the length of their vehicle to load firewood is counterproductive. For as long as anyone knows the road departure limit has been 300 feet. This distance was acceptable to most forest users. The assault on citizen access to public lands is of major concern to this organization. We have never advocated building new roads, however we are adamantly opposed to the closure of existing roads. The urban view of what constitutes a road and what we outdoors enthusiasts call a road are eons apart. Stop placing restrictions on how we use the existing roads. Snowmobiles, which are defined as OHV's are losing millions of acres of	All	Both	emc0133GB

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	recreational land every year. The snowmobile running over several feet of snow does no damage to the environment. All areas closed to snowmobile use in the past twenty years need to be reopened.			
34.	Recreation: Every single recreational experience begins with a motor vehicle. The most rabid environmentalist will drive as far as possible before hiking, skiing, or mountain biking. From the 2009 Table of Wilderness Visits to Montana National Forests versus Multiple-use Visits the reader will learn that only 3.02% of visits were to wilderness areas. This statistic proves the need to keep all existing roads open rather than closing them.	All	Both	emc0133GB
35.	A plan to expand existing utility corridors must be implemented. The BOA recognizes the Nations need for more electricity but prefers to contain transmission lines in existing corridors.	All	Both	emc0133GB
36.	"Grouse are tolerant of automobiles and may be watched from fairly close range if the observers do not leave their vehicle" (Call and Maser 1986). Signage near a lek can be used to warn visitors to remain in their vehicles and not create disturbances that cause sage grouse to leave the lek. Road closures are not necessary except in some cases where the road is too close to a lek. In that case, the road should be rerouted or seasonally closed until breeding season is over.	All	Both	emc0139GB
37.	"Cattle do not commonly cause abandonment of nest or trampling of nest and may be grazed during any season as long as sagebrush and forb components do not deteriorate as a result of such activity" (Call and Maser 1986)	All	Both	emc0139GB
38.	Livestock "grazing management may be used to help create the plant structure and composition desired for sage grouse" (Call and Maser 1986).	All	Both	emc0139GB
39.	I am an atv rider and belong to the Canyon County ATV Club. I have been riding in Owhyee County for about 8 years now, and believe that there are enough roads closed to protect the grouse. I have also seen 5 or 6 flocks of up 100 birds (this is just a guess) in them in my riding around. And also smaller flocks of them. The point is that they seem to be doing just great in Owhyee county as things stand right now. I believe that the county has been closed to sage grouse hunting for several years now. If you are worried about the habitat you might want to take a look at the mining and cattle grazing in this area.	All	Both	emc0140GB
40.	Transportation systems within critical sage grouse breeding areas (leks) should be analyzed based on current use (amount of use, time of use, and user groups) and impacts or disturbances on sage grouse during critical periods. Iron County questions how much of an impact two track roads that are seldom traveled during the critical breeding period contribute to fragmentation. This issue should be adequately addressed in the strategy.	All	Both	emc0142GB
41.	Closure of roads and trail, and elimination of grazing (both of which have been around long before the Sage Grouse popUlation were in trouble) is not the answer to restoration of the Grouse populations.	All	Both	emc0145GB
42.	First, I think you need to consider that a vehicle full of people, be it a power company or casual use recreationists at the same time in or around an active lek will have the same or similar impacts, no matter what their activity is. Therefore, when you complete this EIS you need to have more restrictions, authorizations and/or permitting practices that cover everybody similarly. For instance, if you have very restrictive regulations on the power company vehicle, you may threaten to pull or alter their permit for a single or a series of impacts or actions. But you may have the same or similar impacts from casual use recreationists. You cannot turn a blind eye to them. They both need similar restrictions and consequences to their potential impacts or actions.	All	Both	emc0149GB

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43.	ODOT wants to reiterate that we support and recognizes the importance and value in environmental review of projects to assure that issues such as greater sage-grouse habitat is identified, evaluated and, if necessary, mitigated. But for projects that are necessary to maintain a safe and efficient transportation system, there needs to be processes in place to allow for project specific evaluation and approval without always requiring an RMP amendment via an EA or EIS. Greater sage-grouse and their habitats are important, but in addressing transportation improvement or maintenance projects or materials needed for these projects, it should not take years of effort and hundreds or thousands of dollars to obtain approvals to move forward. By developing the above mentioned recommendations, it should allow individual BLM Districts across the west to implement land management strategies for improved greater sage-grouse habitat without having to struggle to address Federal, State and Local Transportation projects and needed material sources.	All	Both	emc0155GB
44.	Although the BLM is pressured by many separate entities, it is imperative that strong efforts are made and followed to enhance, preserve habitat and prevent those areas from being exposed to development or to off road vehicles. Although not all ATVers are harmful many do not stay on designated trails and they make their own trails over time.	All	Both	emc0169RM
45.	Closing the established OHV trails will only stop the law abiding people from going out in those areas. It will NOT stop the poachers or others that are causing problems with the wildlife and habitat. Allowing the ATV riders to continue using the trails, they might keep the poachers out of the area for fear of being caught. And they can and will report any problems that they see to the proper officials.	All	Both	emc0175GB
46.	I believe that motorized off highway use threatens sage grouse and it's habitat and motorized access should be curtailed, not expanded.	All	Both	emc0184GB
47.	I am very concerned about the impact on sage-grouse of the rapid growth of gas and oil development in the West. The scientific report prepared for the BLM last year, 'Report on National Greater Sage- Grouse Conservation Measures', made it clear that many changes in current practices need to be made. These include protecting sage-grouse habitat from large scale disturbances, limiting disturbance to one per section with less than 3% of the section's surface area, reducing road density, only permitting transmission lines away from the critical habitat, etc.	All	Both	emc0185rm
48.	Regarding recreation, the plan amendments should direct local land managers to cooperate and coordinate with local governments and affected stakeholders to establish achievable goals for protection of the Grouse (lek /nest disturbance, wintering areas and sage habitat degradation) and to mitigate potential affects upon recreation through closure of existing, inventoried and managed routes.	All	Both	emc0199GB
49.	The amendments should recognize that local agency recreation planners and managers are the best suited to work with motorized stakeholders to establish a manageable, designated, user and nature friendly route network for motorized access. This includes access roadways away from paved highways; high clearance routes for pickups, jeeps and other 4WD vehicles; that can be shared under mixed-use by other OHV categories such as trail bikes, ATV/UTV and/or OSV in the winter. Just as important to the motorized community are rural 2 track routes, ATV width trails, and trail bike singletrack width routes.	All	Both	emc0199GB
50.	Any plan amendment should include adequate site-specific analysis on anticipated impacts of motorized and non-motorized recreational activities, which often have little to no impact on wildlife. The impacts of motorized and mountain bike routes that are primarily used for recreation should not be "lumped in" with highways and other	All	Both	emc0199GB

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	highspeed access roads.			
51.	The same has been shown for motorized access and use. For example, Grouse leks are concise, well-established, historic areas that can last for decades. Add to this that leks are mostly in use for strutting/mating during crepuscular hours and that motorized recreation is generally NOT undertaken during those hours…the two can be successfully separated.	All	Both	emc0199GB
52.	The analysis should include the fact that the BLM, Forest Service, state, county, local and tribal land management agencies are moving towards a "limited to designated route" paradigm. This process should prioritize areas where such planning has not yet occurred. I strongly believe that the goals, objectives and new paradigm can be met without severely limiting or restricting responsible, managed motorized recreation uses within the planning area.	All	Both	emc0199GB
53.	Because ATV use has increased dramatically in the past several years, there needs to be an aggressive training and enforcement policy to reduce illegal ATV use. Legal roads need to be clearly marked and illegal roads need to be barricaded. Enforcement efforts need to be increased, especially during the hunting seasons to reduce the damage being done by ATV's.	All	Both	emc0217GB
54.	BRC has reviewed all the relevant literature and issues concerning the current planning process undertaken by the BLM and its National Greater Sage-Grouse Planning Strategy (Charter). We have also reviewed current OHV/ORV literature and statistics from the USDA Forest Service as it applies to use trends and to management on the ground. These trends cross directly over to the BLM and can be used to justify sound management techniques for motorized recreation regardless of the differing Code of Federal Regulations (CFR's) that govern each agency.	All	Both	emc0227GB, emc0092rm
55.	In reviewing the available literature and studies listed above, BRC has also noted there is scant to little information anywhere related to the effects of motorized recreation on the Grouse and there are no definitive studies to that effect cited anywhere in the database. Particularly considering the intense scrutiny and collective scientific energy expended on this species, BRC concludes that motorized recreation in any of its forms is not a significant effect/impact on the Grouse. The USFWS listing petition decision supports this as well. Motorized recreation and/or OHV/ORV is barely mentioned and mostly anecdotal in nature. However, BRC does understand that OHV-related site-specific research may be needed to fine tune vehicle-based recreation on roads, trails, and areas so that future Grouse-friendly motorized access is assured.	All	Both	emc0227GB, emc0092rm
56.	The production of a National Environmental Policy Act (NEPA) document and subsequent Environmental Impact Statement/Supplemental Environmental Impact Statement (EIS/SEIS), when completed, will guide future management decisions for the Grouse and its sage based habitat. Because of the size of the landmass involving current Grouse habitat and distribution, the BRC considers the production of this NEPA document to be a major landscape level decision. The subsequent Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) will affect motorized recreation in the 11 states where the Grouse currently occurs (both East and West planning units).	All	Both	emc0227GB, emc0092rm
57.	In addition the BLM has published 2 Instruction Memorandums (IM) dated 12/22 and 12/27 2011 that will provide "interim conservation policies and procedures for BLM field level operations". These will also have the potential to greatly affect/impact all aspects of motorized recreation, from traditional camping, hunting and fishing access to access	All	Both	emc0227GB, emc0092rm

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	for photography, bird watching, mountain bicycling, boating, cross country skiing and wilderness areas. Most of all, these IM's could have a serious negative impact on casual OHV use and permitted special events such as enduros, trials, hare-scrambles and dual sport rides to name a few. All forms and aspectsof motorized recreation…off-highway/off road motorcycle, dual sport/adventure sport motorcycle, ATV, SBS, OSV, 4WD and even all street legal vehicles…may be affected if the IM's are interpreted in the wrong manner in a "one size fits all" decision. This has occurred in the past when elements of the motorized recreation community were not included in the planning process. BRC is very concerned that may well be the final outcome if motorized recreation community members are not involved in this planning process from the beginning. We also believe that rather than the broad sweep of the brush as thusly painted in the most recent IM's and summaries of said, a more "common sense" approach (already suggested for adoption by BLM in other Grouse Management Strategy documents) needs to be implemented in order to minimize the affects/impacts on both the Grouse and the recreating public.			
58.	In order to accomplish this "common sense" approach to management, local land managers at the Resource Area Office level need to be heavily involved with the motorized public to establish achievable goals for protection of the Grouse (Lek /nest disturbance, wintering areas and sage habitat degradation) and to mitigate potential affects upon recreation through closure of existing, inventoried and managed routes. These types of closures should always be viewed as the most extreme measure to undertake after all other management techniques and measures have failed. Under the IM's, the BRC believes that sound, proven OHV management techniques can allow the agency to protect the Grouse and habitat and to provide for responsible, family oriented OHV/ORV recreation, regardless of which form it takes	All	Both	emc0227GB, emc0092rm
59.	Part of this process is to determine time and use regulations that minimize real conflicts between the recreating public and the Grouse. BRC notes that hunting of the Grouse is still allowed in at least 8 of the 11 states where it is found and that by setting reduced seasons and bag limits, the Grouse is not considered at risk and that hunting can still occur. The same can be said for motorized access and use. For example, Grouse Leks are concise, well-established, historic areas that can last for decades. Add to this that the Leks are mostly in use for strutting/mating during crepuscular hours and that motorized recreation is generally NOT undertaken during those hours…the two can be successfully separated. BRC also notes the BLM, like the Forest Service, state, county, local and tribal land management agencies is also moving towards a mostly "designated route" planning effort for use of roads and trails that are compatible for motorized recreation use and we support that concept. Except for OSV winter use, where snowpack allows, BRC recognizes that unauthorized/unmanaged cross country travel can be damaging to both wildlife and habitat.	All	Both	emc0227GB, emc0092rm
60.	The local Resource Area recreation planners and managers are the best suited to work with the motorized stakeholders to establish a manageable, designated, user and nature friendly route network for motorized access. This includes access roadways away from paved highways, highclearance routes for pickups, jeeps and other 4WD vehicles that can be shared under combined use by other OHV/ORV categories such as trail bikes, ATV/SBS and or OSV in the winter. Lesser used but just as important to the motorized community are rural 2 track routes that may see little use throughout the year, ATV width trails and trail bike single track width routes. Routes that are duplicitous or fill no need or are illegally established may be considered for closure and rehab. The desired condition is an adequate system/mixture of routes of suitable length and skill levels that follow Best Management Practices (BMP) established by	All	Both	emc0227GB, emc0092rm

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	Best Available Science (BAS).			
61.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Minimization of route networks and closures to motorized use or limiting motorized use to designated routes;	All	Both	emc0234GB
62.	Roadless sagebrush habitat will also become increasingly important to facilitate species' adaptation to climate change	All	Both	emc0234GB
63.	BLM should put the following management prescriptions in place for L WCs at a minimum: Closed to motorized use or limited to motorized use on designated route	All	Both	emc0234GB
64.	On page 11 of the NTT report the conservation measures for Travel and Transportation call for limiting motorized travel to designated roads, primitive roads, and trails at a minimum. While we respect the need for not creating roads haphazardly, going off-road to retrieve game should not be restricted. These one-time cross-country travel trips should be permitted.	All	Both	emc0239GB
65.	The evaluation of the need for permanent roads or seasonal road/area closures should include public input as part of the evaluation. Many of these roads that receive limited use are important to ranchers for getting to water developments, distributing salt or supplements, and towing horse trailers to the ends of the roads to initiate riding to move livestock. Effective livestock grazing, which can benefit sage-grouse, depends on the continued use of such roads and trails. There seems to be some conflict when a rancher uses a road that is adjacent to a lek, but agency biologists don't recognize a conflict when they travel to these same sites several times each spring to do lek counts, at which time they stop and get out of their vehicles. Closure of these roads impacts members of the NOGA, limits mineral exploration, and others that use public lands. Closure should be a last resort, and seasonal restrictions need to be evaluated with public input.	All	Both	emc0239GB
66.	"During activity level planning, where appropriate, designate routes with current administrative/agency purpose or need to administrative access only" (page 11, third bullet under Priority sage-grouse habitat areas). This implies that if the agency folks determine that they need a road to remain open to do their job, then it will remain, but be restricted to their use only. But others that identify a need to use a road to do their jobs (ranchers, geologists, guides/outfitters, etc.) are basically out of luck. We would like this double standard to be evaluated in the EIS.	All	Both	emc0239GB
67.	"Allow no upgrading of existing routes that would change route category.." (page 12, first bullet). Many of the roads that are established by repeated travel over the same trail require upgrading to prevent erosion. Installation of water bars, sediment traps, and berms to prevent run-on are the types of upgrades that limit erosion. Without these upgrades, habitat damage can occur, especially on slopes.	All	Both	emc0239GB
68.	"Conduct restoration of roads, primitive roads, and trails not designated in travel management plans..(page 12, second bullet). The travel management plans need to be developed with public input and the decision to "conduct restoration" (i.e., road closure) also needs to include public input.	All	Both	emc0239GB
69.	Off road vehicles used for either recreational or hunting use can interfere with the birds twelve months out of the year	All	Both	emc0241GB
70.	We are concerned that amendment of federal plans could have an impact on local transportation plans and RS 2477 access rights. Such potential impacts must be fully analyzed in the NEPA process. The state and counties will not accept the closure of roads that have historically provided access to public land resources and remain important today.	All	Both	emc0242GB

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71.	Sage grouse habitat conservation measures should not preclude the use of certain BLM lands for OHV recreation. Any losses of OHV recreational lands should be mitigated by provision of additional lands outside of priority habitat and enhanced recreational facilities.	All	Both	emc0242GB
72.	Specifically, management prescriptions for this proposed ACEC should implement the conservation measures recommended by the Sage-Grouse National Technical Team in December, 2011 (SGNTT, 2011). Recent publications have exhaustively documented the special conservation actions needed to sustain Greater Sage-Grouse in the American West (SAB 2011). Because this proposed ACEC includes priority/core sage grouse habitat, we recommend the following special management to address activities that will fragment the sage-steppe habitats upon which the greater sage-grouse depends: Travel management: Within the proposed ACEC, motorized recreation should be limited to designated roads and trails. The BLM should review current travel management plans and evaluate the need for permanent or seasonal road and area closures to protect Sage-Grouse (SGNTT, 2011). Roads and trails not designated for motorized recreation within the ACEC should be obliterated and restored to native vegetation to improve Sage-Grouse habitat.	All	BLM	emc0248GB
73.	4) By and large road densities on BLM lands are so low as to be not a factor and keeping access points open as shared roads with much difficulty to travel are essential for management of fire suppression and livestock and wildlife guzzlers and weed control and animal and hunter and gatherer activities. Combined cross country travel be it man on foot, wheeled from the standpoint of increasing weed spread or potential to start fires. (Shared roads interpreted by me are current existing historical places where wheels little bird feet travel those roads, trails, ways and routes for gravel, or small stones, water from rancher's troughs, different cover or watching for predators.)	All	Both	emc0257GB, emc0104rm
74.	All existing US, State, County, BLM and USFS roads and right of ways should not have any traffic restrictions placed on them. Your Lek site maps already demonstrate that either your data is defective in not making SG lek site observations greater than a 1,000 feet or so feet from a road, or roads enhance SG habitats and do not degrade SG populations.	All	Both	emc0260GB
75.	All existing US, State, County, BLM and USFS roads and right of ways should not have any traffic restrictions place on them for accessing private lands or mining claims. These are existing rights that have generally been used for decades and coexist with SG popu lations/habitat.	All	Both	emc0260GB
76.	The rights of land owners and mining claim owners should be protected to the fullest extent possible as they have existing property and access rights. Inhibiting access will cause unnecessary litigation and I believe such limitation will not improve SG populations.	All	Both	emc0260GB
77.	I would like a section discussing the access rights of private land owners and mining claim owners across BLM lands and what the BLM's view of these rights are and the limitations of the law to restrict access. I want to see specific language guidance on what limitations, if any, the BLM believes it is under in restricting access rights of private property and mining claim owners of preexisting rights of way.	All	Both	emc0262GB emc0107rm
78.	On page 11 of the Conservation Measures, the Travel and Transportation section lists how road and highway networks may adversely affect sage-grouse and its habitat, and lists methods of minimizing the effects that roads and highways may	All	Both	emc0271GB

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	have on sage-grouse and its habitat. Many of the methods listed are already requirements of existing federal regulations, and most likely State and local regulations that define road and highway construction and maintenance on the public lands. The Travel and Transportation section also addresses restoration (reclamation, closure) of roads, primitive roads and trails not designated in travel management plans. It is Kane County's position that the County should be consulted prior to restoration (reclamation, closure) of any roads and trials within its boundaries.			
79.	Finally, roads may cause very similar impacts to sage-grouse as well as threatening to cause unique harm to sage-grouse and associated habitat. Surveys reveal that approximately 95 percent of all sage-grouse habitat is within 1.5 miles of a mapped road. As with other infrastructure discussed herein, impacts from roads may include direct habitat loss, direct mortality, barriers to migration corridors or seasonal habitats, facilitation of predators and spread of invasive vegetative species, and other indirect influences such as noise. Roads also increase human access to sage-grouse habitat, thus causing indirect effects from human presence, including avoidance, disturbance, stress, and vulnerability to hunting and poaching. Use of roads may also lead to pollution, as oil is released onto the road and/or waterways, and dust and fine particulate matter rises from impact with dirt roads. This dust not only pollutes the air, but can damage vegetation through interference with photosynthetic activities. Roads also may provide open corridors for predators, and thus sage-grouse may avoid these uncovered pathways. Because of all these associated impacts, it is no surprise that sage-grouse tend to avoid roadways and areas close to roads. This behavior can severely fragment their habitat and limit their willingness to travel to different habitats required for year-round survival, or alternatively requiring them to travel long distances to find secure habitat for breeding, nesting, brood-rearing, and wintering. In fact, studies have revealed that areas now extirpated have a 25 percent higher density of roads than currently occupied areas.	All	Both	emc0276GB
80.	For the same reason, we appreciate the Technical Team Report's suggestion to evaluate the need for permanent or seasonal road or area closures.28 Additionally, new roads should only be built in priority sage-grouse habitat when absolutely necessary for agency or administrative purposes or for motorist safety. We agree with the Technical Team Report's suggestion to exclude new Right of Way permits in priority sage-grouse habitat subject to valid existing rights.29 We also support the Report's directive to remove powerlines where possible and reclaim right-of-way sites no longer in use and relocating or undesignating unauthorized rights-of-way	All	Both	emc0276GB
81.	El Paso maintains and operates numerous facilities within sage-grouse habitat; our operations staff need to access portions of our right-of-ways to conduct emergency repairs, address safety concerns and perform routine maintenance activities. On page 11 of the NIT Conservat ion Measures document, the second bullet of the Travel and Transportation section indicates that "Travel managemen/ should evalua/e the need for permanent or seasonal road area closures." Provisions must to be made in the conservation measures to allow year- round access to the ROW for both safety and maintenance issues. In the event roads arc sched uled for closu re, the BLM/FS must be required to coordinate any road or area closures with the public and all affected parties such as El Paso prior to any permanent or seasonal closures to see how thcse closures would impact pipeline safety.	All	Both	emc0278GB
82.	Any new conservation measures should allow for va ryi ng degrees of impact within lhe PPH areas. The third bullet on Page 23 of 74 of the NTT Conservation Measures document addresses this issue as it pertains to Leased Federal Fluid Mineral Estate . The conservation measure stales " ... Any development to be placed at the most distal part of the lease	All	Both	emc0278GB

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	from lhe lek, or, depending on lopography and other habitat aspects, in an area that is less demonstratably harmful to sagegrouse." While an absolute requirement that sage-grouse preservation should trump all other siting considerations is obviously not palatable, the concept of considering the distance and terrain between disturbance and the sage-grouse habitat to be protected is very appropriate. As the distance increases from a known breeding location or complex of locations, increased levels of disturbance should be allowed. For example, roads that intercept the edge of a PPH should be available for use during the breeding season. Impacts from this level of disturbance would be minimal and still allow for projects to move forward.			
83.	Suggest that –on Page 11. Priority sage-grouse habitat areas bullet #1. "Limit motorized travel to designated roads and close and re-vegetate primitive roads and trails". Suggest that this sentence be removed which would encourage voluntary conservation.	All	Both	emc0291GB, emc0055RM, emc0119RM
84.	Outline criteria for travel management planning to minimize impacts of off-road vehicle use in sage grouse habitat and lek areas.	All	Both	emc0305GB
85.	On page 11 of the NTT report the conservation measures for Travel and Transportation call for limiting motorized travel to designated roads, primitive roads, and trails at a minimum. While I respect the need for not creating roads haphazardly, going off-road to retrieve game should not be restricted. These one-time cross-country travel trips should be permitted.	All	Both	emc0322GB
86.	The evaluation of the need for permanent roads or seasonal road/area closures should include public input as part of the evaluation. Many of these roads that receive limited use are important to ranchers for getting to water developments, distributing salt or supplements, and towing horse trailers to the ends of the roads to initiate riding to move livestock. Effective livestock grazing, which can benefit sage-grouse, depends on the continued use of such roads and trails.	All	Both	emc0322GB
87.	Closure of these roads impacts me, limits mineral exploration, and others that use public lands. Closure should be a last resort, and seasonal restrictions need to be evaluated with public input.	All	Both	emc0322GB
88.	"During activity level planning, where appropriate, designate routes with current administrative /agency purpose or need to administrative access only" (page 11, third bullet under Priority sage-grouse habitat areas). This implies that if the agency folks determine that they need a road to remain open to do their job, then it will remain, but be restricted to their use only. But others that identify a need to use a road to do their jobs (ranches, geologists, guides/outfitters, etc.) are.basically out of luck. I would like this double standard to be evaluated in the EIS.	All	Both	emc0322GB
89.	"Allow no upgrading of existing routes that would change route category .. " (page 12, first bullet). Many of the roads that are established by repeated travel over the same trail require upgrading to prevent erosion. Installation of water bars, sediment traps, and berms to prevent run-on are the types of upgrades that limit erosion. Without these upgrades, habitat damage can occur, especially on slopes.	All	Both	emc0322GB
90.	"Conduct restoration of roads, primitive roads, and trails not designated in travel management plans ... (page 12, second bullet). The travel management plans need to be developed with public input and the decision to "conduct restoration" (ie., road closure) also needs to include public input.	All	Both	emc0322GB
91.	On page 25, Wildfire Suppresion, Fuels Management and Fire Rehabilitation section of the NTT report indicates that wildfire has resulted in significant habitat loss for sage-grouse. Yet quick response to fires is critical in managing the size	All	Both	emc0322GB

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	of the fires and the intensity of the fires, and the BLM and USFS want to close roads that would facilitate quick response. The conservation measure to close roads in high priority sage-grouse habitats (page 11) is in direct conflict with effective wildfire suppression. This is just one of the many conflicting issues in this document.			
92.	We are concerned that the Notice specifically calls out off-highway vehicle (OHV) management and recreation as a preliminary issue, particularly as supporting documents from the U.S. Fish and Wildlife Service (FWS) cite other factors as the primary threats to the species. For example the FWS Fact Sheet on Endangered Species Act Listing Decision for the Greater Sage-Grouse dated March 5, 2010 notes; "The Service analyzed potential factors that may affect the habitat or range of the greater sage-grouse and determined that habitat loss and fragmentation resulting from wildfire, energy development, urbanization, agricultural conversion, and infrastructure development are the primary threats to the species." While we understand that on the localleve! there may need to be consideration of how OHV trails and areas impact the sage-grouse on a case-by- case basis, there seems to be little science supporting OHV use as a substantial factor affecting overall sage-grouse populations.	All	Both	emc0330GB
93.	Clearly all forms of recreational users utilize roads, trails, campsites, facilities and other features/amenities on public lands. What is the purpose for singling out OHV use when, again, there is little if any scientific evidence that OHV recreation poses any more of a threat than other forms of recreation?	All	Both	emc0330GB
94.	o Roads The NTT Report suggests several broad-scale prohibitions on various land-use activities such as road building, which are over-inclusive and unnecessary. For example, the Report suggests that all off-road travel be prohibited in priority habitat and no new rights-of-way be allowed in priority habitat, except in limited circumstances such as accessing valid existing rights. Similarly, the Report suggests that all existing roads in Wilderness Study Areas and lands with wilderness characteristics be closed and restored. The use of such blunt prohibitions, rather than more narrowly tailored management prescriptions should be avoided. Periodic use of most such roads would not likely have an adverse effect on sage-grouse populations.	All	Both	emc0331GB
95.	Furthermore, in its Warranted but Precluded decision FWS identified power lines as directly affecting greater sage-grouse and outlined the possible threats: collision and electrocution hazard; decrease in lek recruitment; increase in predation; fragmentation of habitat; and facilitation of the invasion of exotic annual plants. Additionally, sage-grouse could be impacted through a direct loss of habitat and human activity (especially during construction periods). Transmission corridors pose a serious threat to the wide ranging sage-grouse and should be analyzed thoroughly in this process. The impacts of fragmentation from transmission lines and the tendency of greater sage-grouse to avoid large infrastructure like power lines should lead to the establishment of strong standards that guide transmission corridors to appropriate areas that avoid impacts to sage-grouse.	All	Both	emc0339GB
96.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Placement, use, construction, and maintenance of roads and railroads in greater sage grouse habitat may lead to negative impacts	All	Both	emc0343GB
97.	In winter, sage grouse select large expanses of sagebrush with gentle topography and avoided conifer, riparian, and energy development (Doherty 2008). Well density had an additional effect in this study (id.). Sage grouse were 30% more likely to use winter habitat if CBM development was not present (id.). There was a landscape-scale effect of	All	Both	emc0343GB

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	habitat selection, with areas with greater sagebrush at a 4 km2 scale receiving greater winter use (id.). Carpenter et al. (2010) found a similar relationship in Alberta, and found that grouse avoided oil and gas wells by 1.9 km and also showed some avoidance of jeep trails. Bruce et al. (2011) found that sage grouse moved widely across winter habitats, using an area of 1,480 km2, and recommended setting aside large reserves for winter habitats. According to Doherty (2008:22), "Identifying and setting aside areas of undeveloped, high-quality habitat within the project area should be top priority." Doherty (2008:22) asserted, "My spatially explicit winter habitat model can be used to identify areas in the PRB that provide the best remaining habitat for sage-grouse in winter." BLM should apply this model to the Powder River Basin and place areas predicted to be the best remaining sage grouse winter habitat off-limits to future oil and gas leasing, in addition to placing strong restrictions on the level of development that is allowed on existing leases. Similar protocols should be developed and followed throughout the remainder of the sage grouse range.			
98.	In his 2008 study, Doherty found that distance to roads and distance to wells were good predictors of sage grouse nesting; since distance to roads and distance to wells were moderately autocorrelated and roads were a more highly predictive modeling variable, distance to wellpads was dropped from the model. According to Doherty (2008:49), "The coefficient for distance to road ([illegible] Model validation later caused distance from roads to be dropped from the model. Notably, in the Powder River Basin study area, CBM access roads could be either constructed roads or two-tracks. Apparently, distance from wells was not tested during model validation, despite being a predictor of nest distribution. Thus, the results of Doherty (2008) can best be characterized as inconclusive with respect to the influence of distance to well on nest site selection. Impact of distance to well on breeding male population on the lek was not tested by this study. This portion of the study also found nest site selection on larger habitat scales, indicating once more that the availability of large tracts of suitable habitat had a positive influence on nest site selection.	All	Both	emc0343GB
99.	Leks must be buffered from wellfield roads Road construction related to energy development is a primary impact on sage grouse habitat from habitat fragmentation and direct disturbance perspectives. Rowland et al. (2006: 5-10) modeled sage grouse distribution, and reached the following conclusions: "The secondary road network is a highly significant factor influencing processes in this landscape and is being developed and expanded rapidly across much of the WBEA. Secondary roads are being built as part of the infrastructure to support non-renewable energy extraction. For example, within the Jonah Field in the Upper Green River Valley, >95% of the area had road densities >2 i/mi2." (Internal citations omitted). Furthermore, "The dominant feature affecting output of the sage-grouse disturbance model was secondary roads, which occupy nearly 8% of the study area (Table 5.2) and are presumed to negatively influence an even larger extent." Pp. 6-15 through 16. Holloran (2005) found significant impacts of road traffic on sage grouse habitat use in the Pinedale Anticline gas field, concluding that habitat effectiveness declined in areas adjacent to roads with increasing vehicle traffic, documenting the secondary effect referenced by Rowland et al (2006). Roads should be restricted from being built within 2 miles of leks. For already-existing roads, a seasonal "lock-out/gate-out" policy should be enforced between March and July. There is precedent for the in the Bill Barrett Big Porcupine CBM Field on the Thunder Basin National Grassland, in which by Settlement Agreement roads within 2 miles of leks are closed each spring, and operator access during this period is via bicycle. The Lander Resource Management Plan Draft	All	Both	emc0343GB

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	EIS has similar restrictions in the agency's Preferred Alternative, under which Timing Limitation Stipulations apply not only to drilling and construction activities but also to all disruptive activities throughout the life of the field.			
100.	Road construction related to energy development is a primary impact on sage grouse habitat from habitat fragmentation and direct disturbance perspectives. Rowland et al. (2006) modeled sage grouse distribution, and reached the following conclusions: "The secondary road network is a highly significant factor influencing processes in this landscape and is being developed and expanded rapidly across much of the WBEA (Thomson et al. 2005). Secondary roads are being built as part of the infrastructure to support non-renewable energy extraction (Chapters 2, 4). For example, within the Jonah Field in the Upper Green River Valley, >95% of the area had road densities >2 mi/mi2 (Thomson et al. 2005)." p. 5-10. Furthermore, "The dominant feature affecting output of the sage-grouse disturbance model was secondary roads, which occupy nearly 8% of the study area (Table 5.2) and are presumed to negatively influence an even larger extent." Pp. 6-15 through 16. Holloran (2005) found significant impacts of road traffic on sage grouse habitat use, concluding that habitat effectiveness declined in areas adjacent to roads with increasing vehicle traffic, documenting the secondary effect referenced by Rowland et al.	All	Both	emc0343GB
101.	At minimum, the NEPA analysis should address the following: • Prioritizing roads for closure to minimize road densities inside sage grouse Core areas. • Providing seasonal closures for existing roads within 2 miles of sage grouse leks.	All	Both	emc0343GB
102.	Notice of Intent (NOI) states: The BLM and FS will consider allocative and/or prescriptive standards to conserve greater sage-grouse habitat, as well as objectives and management actions to restore, enhance, and improve greater sage-grouse habitat Both agencies must consider the respective roles of program and project-level planning. As applied to the recreation context, if the agencies consider plan amendments that conduct a "open, close or restrict" allocation decision they must comply with applicable law, including NEPA and the 2005 Travel Management Rule ("TMR"). The TMR requires that changes from the existing management prescriptions must be analyzed through advance notice and public comment "consistent with agency procedures under [NEPA]." 36 CFR § 212.52(a). If plan amendments make "zoning" changes that would alter existing management prescriptions, the agencies must conduct site-specific analysis sufficient to comply with the NEPA.	All	Both	emc0345GB
103.	The use of sound modeling and optimization of road design in sage grouse habitat could greatly reduce the need for the proposed conservation measures in priority habitat. Recent innovation and research has shown that more efficient use of roads (e.g. minimizing crew rotations, and where logistically and economically feasible piping rather than hauling produced water and condensate) can greatly reduce traffic and subsequent impacts to sage grouse. This approach has been intentionally undertaken by a number of API members, and has resulted in significant reduction of truck traffic up to 85% in some cases, compared to conventional development scenarios. A collaborative approach with industry to optimize road design and road use is more likely to reduce overall impacts to sage grouse than the proposed blanket surface disturbance thresholds (which inappropriately assume an equal level of effect across all road types, topography, and levels of use or the same type of development and disturbance for projects).	All	BLM	emc0346GB
104.	We are concerned that amendment of federal plans could have an impact on local transportation plans and RS 24 77 access rights. Such potential impacts must be fully analyzed in the NEP A process. Uintah County will not accept the	All	Both	emc0376GB

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	closure of roads that have historically provided access to public land resources and remain important today.			
105.	The BLM has a multiple use mandate under Federal Land Policy and Management Act (FLPMA). The existing Resource Management Plans (RMPs) were developed after many years of analysis and public input, resulting in land use plans that struck an acceptable balance between multiple uses. Yet, this latest effort illustrates the continued threat of political vagaries potentially shifting that balance in a manner that is detrimental to energy development, grazing, fuel and vegetation management, mineral development and recreation. Any selected alternative must minimize the .restrictions placed on these legitimate and important land uses. We encourage the BLM to follow through on its commitment to protect valid, existing rights; such as grazing and energy leases and RS 24 77 access rights. We encourage the BLM to look not only at habitat availability, but also habitat suitability given the energy and mineral potential and other multiple use potential of preliminary priority sagegrouse habitat areas. The adoption of sound consistent land use areas insures there is no risk of sage-grouse conservation efforts hampering the energy industry's ability to produce domestic natural resources	All	Both	emc0376GB
106.	Roads and off-highway vehicles. Issue: Roads fragment sage-grouse habitat, and vehicle use on and off-road disturbs sagegrouse and can contribute to sage-grouse population declines.	All	Both	emc0391GB
107.	Less than 5 percent of sage-grouse current range is >2.5 km (>1.55 mi) from a mapped road (Knick et al. 2011). Roads have multiple impacts on sage-grouse (SGNTT 2011: 11, citing others; Braun 1998). Sage-grouse are killed in collisions with vehicles and may be affected by roads up to 6.9 km (4.2 miles) away (Connelly et al. 2004: 13-21, Table 13.1). Off-highway vehicles can disturb sage-grouse, fragment habitat, and spread nonnative plants in sagebrush steppe (Knick et al. 2011). The BLM has affirmative duties to evaluate existing authorizations and uses (including travel management) and take steps to protect natural resources, including sage-grouse (BLM Memo IM 2012-043).	All	Both	emc0391GB
108.	BLM must characterize and map all roads and trails that are found in sagebrush habitats. It must require that no off-road use occur, and no widening and blading of road shoulders intrude into, and extend weeds into, occupied habitats. Place after place from Ely Forest Service to the Montana Mountains to the Pahsimeroi, we are seeing side blading of roads and these road verges and water bars providing a corridor for cheatgrass expansion. Some of this is being done under claims of a need for fire access and fire breaks when in fact the spread of cheatgrass from the road blading is increasing the likelihood of fire.	All	BLM	emc0411GB
109.	In Elko County, the Wells and Elko RMPs leave nearly all lands wide-open to OHV use, crosscountry mining, oil and gas, geothermal and all manner of other exploration – including industrial wind or other energy roading. This process cannot just allow the current nightmare of roading in many areas of sage-grouse habitat to continue. BLM must act to identify roads for seasonal closure, or active restoration removal to limit disturbance during sensitive periods, and to recover and restore disturbed road area weed corridors. This will help provide habitat security and protection for sagebrush habitats and sage-grouse during sensitive seasons of the year. Motorized grazing permittee use must be limited. Ranchers have horses, and can conduct activities in wild lands using horses.	All	Both	emc0411GB
110.	BLM should identify some roads for closure and rehab under this process - to limit weeds, disturbance, predator travel corridors, etc	All	Both	emc0411GB

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111.	The Plan amendments "will be limited to making land use plan decisions specific to the conservation of sage-grouse." This will only serve to cause more conflict. Many inadequate mining, energy, visual, transportation/OHV and other provisions of Land Use Plans come into direct conflict with sage-grouse habitat protection requirements, and it is very hard to understand just how BLM will split hairs here. See WWP Jarbidge RMP comments, explaining how weak VRM standards, lack of mineral withdrawals, energy accommodations and other RMP provisions would adversely affect management of sage-grouse habitats for sustainable populations. It will also serve to put more species in jeopardy - as sagebrush-dependent species with differing habitat requirements to some degree than sage-grouse get impacted as agencies shift and intensify all manner of degrading and disturbing uses (such as livestock) into the Sacrifice General occupied habitats or non-grouse areas.	All	BLM	emc0411GB
112.	For the past couple of years, agencies have been using another category to try to separate out populations, and minimize the importance of losses to the sagebrush habitats. This is the effort to segregate greater sage-grouse into eastern vs. western portions of the range on the basis of claims that grouse face different threats in different parts of their range. USFWS used this artifice in defending its toothless Warranted but Precluded Finding in litigation, and took it to absurd lengths in its arguments there. First, many of the same threats occur across the range - livestock grazing, roads no matter what the cause, invasive species, mining. Second, increasingly renewable energy threats with many of the same impacts as oil and gas are accelerating in the western portion of the species range, and mining is exploding in northern and central Nevada and some other western areas. Plus hundreds of thousands of acres are now being leased for oil and gas development all over Nevada. Renewable energy examples: Major industrial wind farm on Steens Mountain Oregon and new transmission lines, major new transmission lines like Gateway and MSTI, geothermal development often by foreign entities (McGinness Hills and other areas), massive geothermal leasing proposals are appearing - for over 500,000 acres on Bridgeport Ranger District lands and elsewhere in NV. Mining is expanding into new areas where sage-grouse populations are already barely hanging on, and new mining is proposed in areas with larger populations, as well. In the east, weeds like cheatgrass are increasing (see WBEA Assessment discussion). New and expanded mining, new transmission lines, and oil and gas harms are far exceeding those agencies claimed would occur from these new or recently expanded developments. See 2012 Yubanet article on failures of Wyoming Core Model in the Powder River Basin.	All	Both	emc0411GB
113.	The lists of Conservation Measures that provide part of the basis for the Federal Register information and this whole process, is limited and uncertain. BLM is not serious about making significant changes. For example with roads - BLM plans merely to limit travel to existing roads - not question whether any existing road is actually needed no matter what the road density may be.	All	BLM	emc0411GB
114.	Road BMPs includes: Restrict traffic to only "authorized users" on new roads. This effectively privatizes the road and the public lands to benefit developers. It cuts off public access to public lands - so that the public cannot see what industry is doing to them and to sage-grouse habitats. This would allow wind developers, oil and gas and other interests to cut off public access to sites. It would give priority to users who profit from public lands - at the expense of the public. We note that the China Mountain DEIS contained just such a provision to block public access, and prevent the public from seeing the environmental damage (and avian and bat mortality) that development and operation of industrial wind	All	BLM	emc0411GB

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	facilities causes. This benefits developers who don't want the public to report dead golden eagles or dead sage-grouse killed by industrial wind or other energy facilities. Plus public lands ranchers who are abusing public lands have long sought to restrict public access (albeit at the same time that the rural county they are in is claiming every goat trail as an RS 2477 right of way). There is not even a requirement that an equal number of roads to those being built must be closed - for example. All these same old standard BLM BMPs do is to enable more disturbance to tear apart a landscape. There is no requirement for removal of existing disturbances from higher quality or other important habitats. Closing and rehabbing "duplicate" roads only does not reduce road density.			
115.	Regarding recreation, the plan amendments should direct local land managers to cooperate and coordinate with local governments and affected stakeholders to establish achievable goals for protection of the Grouse (lek /nest disturbance, wintering areas and sage habitat degradation) and to mitigate potential affects upon recreation through closure of existing, inventoried and managed routes.	All	Both	flb0000gb
116.	The amendments should recognize that local agency recreation planners and managers are the best suited to work with motorized stakeholders to establish a manageable, designated, user and nature friendly route network for motorized access. This includes access roadways away from paved highways; high clearance routes for pickups, jeeps and other 4WD vehicles; that can be shared under mixed-use by other OHV categories such as trail bikes, ATV/UTV and/or OSV in the winter. Just as important to the motorized community are rural 2 track routes, ATV width trails, and trail bike single-track width routes.	All	Both	flb0000gb
117.	The analysis should include the fact that the BLM, Forest Service, state, county, local and tribal land management agencies are moving towards a "limited to designated route" paradigm. This process should prioritize areas where such planning has not yet occurred. I strongly believe that the goals, objectives and new paradigm can be met without severely limiting or restricting responsible, managed motorized recreation uses within the planning area.	All	Both	flb0000gb
118.	I also believe thrill-seeking ORV enthusiasts should confine their activities to well-managed courses and tracks, and do not merit access to the greater wilderness in any way.	All	Both	fld0005rm, fld0005gb
119.	I support closing roads to motorized vehicles when it they are likely to be destructive to the land.	All	Both	fld0007rm, fld0007gb
120.	Closing access to OHVs may not impact Grouse populations at all, but it will severely impact the lives of families that recreate on OHVs	All	Both	fle0002gb
121.	I understand the value of the Sage Grouse and the threat of extinction. However, I do not believe that there is any credible evidence to suggest that motorized recreation or mountain biking have a significant impact on Sage Grouse populations. If motorized recreation impacts on the Sage Grouse are found, the impact areas should be well defined and alternative recreational routes developed to maintain or increase recreational activities available.	All	Both	fle0007gb
122.	The motorized recreation and mountain biking community have lost too many routes. Greater numbers of users are sharing fewer trails increasing the impact on those trails. I support policies that responsibly increase the availability of motorized and mountain biking trails to the benefit of the people with a sustainable impact on the land.	All	Both	fle0007gb
123.	Reduce overall road density	All	BLM	fln0000rm
124.	The lead agency will divulge and explain any impacts on state and county transportation plans and routes. They will also	All	Both	rmc0004GB

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	allow for management coordination with the state and county on travel restrictions on all roads throughout the resource area undergoing plan amendments.			
125.	The plan should include protection of habitat from energy developmetn and road building	All	Both	rmc0008RM
126.	The Organizations are very concerned that the 2010 Conservation Measures proposed do not accurately reflect the priority or significance of particular threats to the Grouse that were identified in the FWS listing decision. A review of the Conservation Measures and related documents could easily allow the conclusion that all BLM planning was found insufficient to protect the grouse. The FWS listing decision specifically noted that only oil and gas exploration and fire suppression were areas where current BLM management was insufficient. The FWS listing decision notes that moving to a designated trail system, as BLM is already doing nationally, is one of the largest and most important protections for grouse habitat involving recreational activity. The failure to properly prioritize threats and management priorities will result in inconsistent management, which may target issues that will generate significant costs and economic impacts and generate little benefit to the grouse.	All	Both	rmc0033GB
127.	The 2010 Grouse Conservation Measures propose management standards for federal lands that do not allow for management flexibility to address the range of impacts from various levels of road usage. The 2010 Conservation Measures specifically identify that all roads will generate similar impacts to the grouse and define roads in a very broad manner regardless of the speed or volume of usage on the roadway. This standard is simply not supported by relevant Grouse research and the Organizations are aware that the presence of a high speed arterial road can be a significant impact to wildlife in the area. The Organizations are also aware that a low speed two track road, that may not be used for days at a time, often has little to no impact on wildlife. These low speed low volume forest service roads are often access points for numerous activities for all forest users that are not involved in grouse management. If these low volume low speed roads are closed, these opportunities will be lost and little benefit to the grouse will be achieved, while the lost recreation will result in significant negative economic impacts to communities. This negative economic impact will directly undermine any support from the public regarding grouse management. Given the range of issues and need for private lands to be involved in grouse management, this loss of public support will directly impair conservation measures taken.	All	Both	rmc0033GB
128.	The 2010 Conservation Measures proposes a single standard for all road management, which is summarized as follows: liThe Travel and Transportation program is principally focused on road networks within the sage-grouse range. Roads can range from state or interstate highways to gravel and two-track roads."l While the level of road usage is not directly addressed in the listing decision, the Organizations believe this lack of discussion evidences the low priority that recreational trail usage is for sage grouse management. As noted elsewhere in these comments recreational usage of grouse habitat has been specifically identified as a minimal threat to the grouse, by both the US Fish and Wildlife Service and the Colorado Department of Wildlife. The Organizations are very familiar with the fact that an interstate highway or arterial road has significantly more impact on wildlife than dispersed motorized recreation in the backcounty, given the intensity of high speed use on the arterial road. This position is based on a large body of scientific works addressing many types of wildlife, that conclude: "Several studies have shown that traffic volume was positively correlated with animal mortality on roads (Fahrig et al 1995, Joyce and Mahoney 2001). For example, Inbar and Mayer (1999: p. 865)	All	Both	rmc0033GB

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	stated that ((Of all the traffic volume data sets, mean nighttime traffic generated the only significant correlation with road kill".Vehicle speed also has long been implicated in animal mortality on roads (Dickerson 1939). Case {1978} and Rolley and Lehman {1992} reported that vehicle speed was significantly correlated with road mortality."s			
129.	Grouse have also exhibited the same avoidance of high traffic high volume roads. Researchers have again noted: "Gunnison sage-grouse also exhibit a clear avoidance of paved, high traffic volume roads during nesting at the patch scale, in addition to prior avoidance of higher density 2-wheel drive accessible roads at the landscape scale. Landscapelevel response may reflect selection for less fragmented areas. However, the direct avoidance of high volume roads in patch-scale models reinforces that Gunnison sage-grouse are selecting for resources hierarchically... ... This corresponds with a lek analysis in Wyoming and Utah which found that greater sage-grouse leks within 7.5 km of Interstate 80 appear to have declined at a much faster rate than those further away." 9 (Internal Citations omitted.) Rather than address the significantly different impacts to wildlife from arterial roads and two track roads, the Report classifies all roads under a similar standard of impact: "The effect of roads can be expressed directly through changes in habitat and sage-grouse populations and indirectly through avoidance behavior because of noise created by vehicle traffic." 10 The failure to distinguish between the different levels of impacts to wildlife that result from the various levels of road development carries through the 2010 Conservation Measures to the proposed management standards for roads. The 2010 Conservation Measures proposed a single conservation measure for all roads as: ". Limit motorized travel to designated roads, primitive roads, and trails at a minimum. Travel management should evaluate the need for permanent or seasonal road or area closures."	All	Both	rmc0033GB
130.	While the distinction between impacts of arterial roads and trails is significantly different when impacts to wildlife are assessed, the varying levels of impacts simply are not addressed in the 2010 Conservation Measures. Unfortunately, the 2010 Conservation Measures propose to manage all roads under a similar standard. This is simply not supported by any research and will result in significant negative economic impacts that simply will achieve little to no benefit to the grouse. The Organizations believe this oversight will directly impair the performance of the 2010 Conservation Measures in terms of protecting grouse and must be remedied.	All	Both	rmc0033GB
131.	2b. Confusion on the impact of low usa&e roads already exists for sa&e lUouse mana&ement The Organizations believe the identification and development of consistent management standards to accurately reflect the possible impact to wildlife of each route is a critical portion of the 2010 Conservation Measures. This lack of consistent accurate management of low speed low volume routes is already an issue for travel management planning in BLM field offices, when field office RMP proposals are compared. Recent proposed RMPs from two field offices in Colorado highlight the conflicting management standards involving grouse management. While the Kremmling and Colorado Valley Field Offices are almost directly contact each other and encompass significant grouse habitat, the proposed RMP's propose management standards that are significantly different. The Kremmling Field Office's RMP proposes to erroneously limit all routes and travel in sage grouse habitat as follows: "Within the Planning Area, reduction of human disturbance and fragmentation is needed in order to protect the remaining sage-grouse habitat. Limiting new roadways, decommissioning unnecessary roads, and reclaiming illegal trails, will help reduce habitat fragmentation and protect the birds and their habitat from human disturbance."11 The Colorado River Valley Office proposed RMP did not include any	All	Both	rmc0033GB

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	restrictions for road development or usage, while significant fire mitigation and oil and gas development regulations were proposed. The Colorado Valley proposal appears to propose managing in conformity with the priority issues in sage grouse habitat as identified in the 2010 FWS listing decision. Unfortunately, the Kremmling offices RMP targets issues that are not a priority in the 2010 FWS listing decision. The inconsistency of these standards could be resolved with the 2010 Conservation Measures accurately addressing the priority of issues that are impacting the grouse. This consistency will lead to lower costs, more effective management and greater public support as management will be effectively protecting the grouse at a minimal cost.			
132.	While the 2010 FWS listing decision did change the status of the grouse on the Endangered Species list, the threats and issues discussed in the listing decision were not a significant change from the existing body of grouse research. The existing body of research, by both State and federal scientific partners of the BlM, indicates low-use roads and trails simply are not an issue for grouse survival or habitat	All	Both	rmc0033GB
133.	This research indicates that the transition to a designated trail system for summer usage is of significant benefit to the grouse compared to open riding area designations. While this change has already been implemented in many field offices, the positive benefits to the grouse that result from this change are simply not addressed in the Conservation Measures, which seek to designate all roads as a negative impact to the grouse. This position is simply not supported when current designated route systems are compared to an open riding designation. The impact of the designated route system for summer use should be addressed in the Conservation Measures in insure the benefits to the grouse from this change are properly identified by field offices in making multiple use decisions involving grouse habitat.	All	Both	rmc0033GB
134.	The wide range of issues impacting the sage grouse are also discussed in the 2010 Fish and Wildlife Service listing decision regarding the sage grouse and CDOW management strategies for the sage grouse. 15 Recreational activities were specifically found to be of minimal concern in sage grouse management in the 2010 USFWS listing decision, which stated: "Although we anticipate use of pesticides, recreational activities, and fluctuating drought conditions to continue indefinitely, we did not find any evidence that these factors, either separately, or in combination are resulting in local or range-wide declines of greater sage-grouse.,,16 While the FWS findings cited above do not specifically identify motorized recreation, they provide an extensive discussion of possible motorized recreational impacts prior to concluding that recreation has a minimal impact on the sage grouse. The 2010 USFWS listing decision again stated that adoption of a designated trail system for recreational purposes is of significant benefit to the sage grouse. The 2010 USFWS listing decision discussed changes to designated trails on USFS lands as follows: liAs part of the USFS Travel Management planning effort, both the HumboldtToiyabe National Forest and the Inyo National Forest are revising road designations in their jurisdictions. The Humboldt-Toiyabe National Forest released its Draft Environmental Impact Statement in July, 2009. The Inyo National Forest completed and released its Final Environmental Impact Statement and Record of Decision in August 2009 for Motorized Travel Management. The ROD calls for the permanent prohibition on cross country travel off designated authorized roads." 17	All	Both	rmc0033GB
135.	As we have seen in the past, any listing triggers an overreaction to restrict many human activities, access to public lands, and road closures.	All	Both	rmc0047GB, rmc0013rm
136.	Before new policy is adopted regarding the preservation and protection of sage grouse and sage grouse habitat, the	All	Both	rmc0054GB

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	issue of road closure needs to be studied and analyzed to a much greater extent than has happened to this time.			
137.	The amendments should recognize that local agency recreation planners and managers are the best suited to work with motorized stakeholders to establish a manageable, designated, user and nature friendly route network for motorized access. This includes access roadways away from paved highways; high clearance routes for pickups, jeeps and other 4WD vehicles; that can be shared under mixed-use by other OHV categories such as trail bikes, ATV/UTV and/or OSV in the winter. Just as important to the motorized community are rural 2 track routes, ATV width trails, and trail bike single-track width routes.	All	Both	rmc0061GB, rmc0035RM
138.	Any plan amendment should include adequate site-specific analysis on anticipated impacts of motorized and non-motorized recreational activities, which often have little to no impact on wildlife. The impacts of motorized and mountain bike routes that are primarily used for recreation should not be "lumped in" with highways and other high-speed access roads.	All	Both	rmc0061GB, rmc0035RM
139.	The analysis should include the fact that the BLM, Forest Service, state, county, local and tribal land management agencies are moving towards a "limited to designated route" paradigm. This process should prioritize areas where such planning has not yet occurred. We strongly believe that the goals, objectives and new paradigm can be met without severely limiting or restricting responsible, managed motorized recreation uses within the planning area.	All	Both	rmc0061GB, rmc0035RM
140.	As discussed above, North Park has a very stable sage-grouse population. Anthropogenic land uses have occurred on the BLM in the past and we have been able to maintain a healthy sagegrouse population. We have had oil and gas development (e.g. the McCallum Oil Field), strip mining, gravel pits, power lines and limited amount of road development. Sage-grouse are present even though there has been historical anthropogenic disturbance. We are requesting that analyses be conducted to show how the current BLM regulations are not adequate to maintain sage-grouse in North Park. We recommend that the BLM analyze disturbance through time, possibly through historic aerial photographs, in conjunction with historical sage-grouse population data to determine the historical amount of anthropogenic disturbance in North Park that has been consistent with the maintenance of a stable sage-grouse population.	CO	BLM	emc0060RM
141.	Where these WMAs are created, if current roads and trails exist that are used for access to surrounding areas and these roads or trails are the only source of access by motorized use, new roads or trails must be provided around these WMAs or at a minimum the lek area, for continued access to the surrounding area.	CO	BLM	emc0067RM
142.	Speed restrictions or other measures such as seasonal closures as deemed necessary through the WMAs could be implemented for further limits of intrusion.	CO	BLM	emc0067RM
143.	It has been proved time and again that animals can adapt to many "encroachments" to their habitat. Fragmentation caused only by a road or trail is only a minor inconvenience to animals. Having a plowed field or some such obstruction of great width would be more likely to inhibit a sage grouse. The need to immediately close roads or trails should be extremely minimal with the exception of roads or trails directly through the middle of lek areas. In most areas of sage brush covered land, rerouting a road or trail around a proven lek area should not be overly cost intensive nor difficult from a terrain standpoint. Public access by motorized means is a resource as well and should be treated with equal	CO	BLM	emc0067RM

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	weight to other resources.			
144.	The following recommendations must be analyzed as a starting point for effective conservation: Reduce overall road density to improve habitat function by applying Technical Team recommendations.	CO	BLM	emc0070RM
145.	(One of the NTT recommendations most important for Routt NF) 3. Conservation measures. The following measures are especially appropriate for the Routt National Forest: "Limit motorized travel to designated roads, primitive roads, and trails at a minimum" in priority habitat areas. Id. at 11. Restore "roads and trails not designated in travel management plans". Id. at 12.	CO	USFS	emc0175RM
146.	V. AMEND THE ROUTT PLAN VIA MECHANISMS THAT WILL BEST HELP CONSERVE GSG. The current Forest Plan direction potentially applicable to GSG conservation (SRC at 5-6) is inadequate to ensure survival and recovery of the species. None of the measures are specifically geared toward protecting GSG, and none of the oil-gas lease stipulations apply year-round. In order to ensure the highest likelihood of conserving GSG, the Forest Service will have to limit human uses of GSG habitat and surrounding areas. It will be especially important that no oil-gas leasing or mineral development be allowed on any GSG habitat and some adjacent land. No road construction can be allowed in GSG habitat, subject to valid existing rights. Livestock grazing may have to be adjusted. Also, as is discussed in part 3 below, the current management prescription assigned to the draft core areas is not appropriate for ensuring the protection of GSG. Thus new Forest Plan direction is needed to incorporate the recommendations outlined by the National Technical Team and ensure the best chances for recovery of GSG populations. The agency should amend the Routt Land and Resource Management Plan via the following methods, using point 1 alone, or preferably, in combination with points 2 and/or 3:	CO	USFS	emc0175RM
147.	It is critical for BLM to consider implementing the following technical team recommendations as minimum standards: Reduce overall road density.	CO	BLM	fll0000RM
148.	Reduce overall road density	CO	Both	flm0000RM
149.	The following recommendations must be analyzed as a starting point for effective conservation: Reduce overall road density to improve habitat function by applying Technical Team recommendations.	East	Both	emc0089RM
150.	iii. Strong components of Wyoming's approach Within core areas, stipulations on BLM, FS, Wind River Indian Reservation, and State of Wyoming lands limit the number of projects and the amount of allowed disturbance (no more than 5%13) allowed per square mile or 640 acres. Surface disturbance is prohibited within a 0.6 mile buffer around active leks (no surface occupancy - NSO), which includes roads during the breeding, nesting and brood-rearing periods (mid-March through end of June). In addition, a March 15 to June 30 timing limitation stipulation is required within nesting habitat within 4 miles of leks. Main roads used to transport production and/or waste products must be more than 1.9 miles from the perimeter of occupied grouse leks. Other roads used for access or maintenance must be more than 0.6 miles from the perimeter of occupied leks. Noise levels at the perimeter of a lek should not exceed 10 dBA above ambient noise from 6 pm to 8 am, so as not to disturb breeding activities (March 1 - May 15). Finally, proponents of new projects are expected to coordinate with the permitting agency and WGFD biologists to determine which leks need to be monitored and what data should be collected/reported. The Executive Order clearly identifies thresholds	East	Both	emc0089RM

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	and outline adaptive management responses if declines in sage-grouse numbers occur14. However, in non-core areas, the EO recommends a 2-mile seasonal buffer around occupied leks and a 0.25 mile NSO buffer around active leks. Research has shown that the latter stipulation is inadequate and scientifically without merit. In addition, a surface disturbance cap is lacking from non-core area stipulations			
151.	The majority of sage-grouse habitat is within 2.5 km of a mapped road (Knick et al. 2011) and many secondary and unmapped roads and trails traverse BLM lands. Roads create both direct and indirect influences on sage-grouse; including: habitat loss, mortality resulting from collisions with vehicles, creation of barriers to migration corridors or seasonal habitats, facilitation of predators, spread of invasive vegetative species, and noise (Forman and Alexander 1998). Off [illegible] (Knick et al. 2011), distribute refuse, disturb and displace wildlife, increase animal mortality, and simplify plant communities (Boyle and Samson 1985). A study of OHV impacts to rangelands in Montana found long-term (2 years) reductions in sagebrush shrub canopy cover as the result of repeated trips in the area (Payne et al., 1983). Eckert et al (1979) observed increased sediment production and decreased soil infiltration rates after disturbance by motorcycles and four-wheel drive trucks on two desert soils in southern Nevada. The Technical Team suggests the following best management approaches for priority sage [illegible] primitive roads, and trails at a minimum. ☐ Travel management should evaluate the need for permanent or seasonal road or area closures. ☐ Complete activity level plans within five years of the record of decision. During activity level planning, where appropriate, designate routes with current administrative/agency purpose or need to administrative access only. ☐ Limit route construction to realignments of existing designated routes if that realignment has a minimal impact on sage [illegible] existing roads, or realignments as described above to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary, and add the surface disturbance to the total disturbance in the priority area. If that disturbance exceeds 3 % for that area, then make additional, effective mitigation necessary to offset the resulting loss of sage [illegible] habitat."	East	Both	emc0167RM
152.	I would like to add my comments regarding the Great Basin Region - National Greater Sage-Grouse Planning Strategy. I appreciate the need to protect our lands through resource management plans, but I believe the plans tend to side on the environmentalist side and not on the users of the land such as I. I am a senior (over 55 years) ATV rider and I appreciate the ability to see our land with ease, but I do not damage our lands. When I hear the goal is to protect sage-grouse, I believe this means closures to lands I want to visit. Please do not take the sage-grouse to the point that existing ATV trails are closed.	GB	Both	emc0182GB, emc0078RM
153.	Address Impacts of Roads: Roads and trails impact sage-grouse habitat through weed invasions, habitat fragmentation, and increased activity. To improve sage-grouse habitat, BLM must prioritize limitations on roads and restoration of unused or harmful roads.	GB	Both	emc0355GB
154.	The majority of sage-grouse habitat is within 2.5 km of a mapped road (Knick et al. 2011), and many unmapped roads and ORV trails crisscross BLM lands. Roads can influence the spread of roadside weed infestations into neighboring	GB	Both	emc0355GB

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	lands. Many studies show that the number of weed species in an area increases dramatically with the density of roads. Invasive weeds are not a food source for grouse, these weeds can outcompete sagebrush and make habitat more prone to fire. The risk that weeds like this will spread from roads and ORV trails into adjacent ecosystems varies depending on the site. It is highest where ORVs leave designated trails and disturb plants and soils, especially on deeper and more fertile soil types, which tend to be most susceptible to invasion. In addition to the impacts from roads on the spread of noxious vegetation, roads can also directly impact birds though collisions and fragmentation of habitat. The NTT suggests the following best management approaches for priority sage -grouse habitat: o Limit motorized travel to designated roads, primitive roads, and trails at a minimum. o Travel management should evaluate the need for permanent or seasonal road or area closures. o Complete activity level plans within five years of the record of decision. During activity level planning, where appropriate, designate routes with current administrative/agency purpose or need to administrative access only. o Limit route construction to realignments of existing designated routes if that realignment has a minimal impact on sage-grouse habitat, eliminates the need to construct a new road, or is necessary for motorist safety o Use existing roads, or realignments as described above to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary, and add the surface disturbance to the total disturbance in the priority area. If that disturbance exceeds 3 % for that area, then make additional, effective mitigation necessary to offset the resulting loss of sage-grouse habitat." Summary: Roads and trails impact sage-grouse habitat through weed invasions, habitat fragmentation, and increased activity. To improve sage-grouse habitat, BLM must prioritize limitations on roads and restoration of unused or harmful roads.			
155.	No new roads should be permitted in priority habitats.	GB	Both	emc0404GB
156.	Statements that 95% of mapped sagebrush habitats are within 1.55 miles of a mapped road probably are accurate but also very misleading, particularly for much of the northern Great Basin. Many of these "mapped roads" are rarely if ever used during the breeding and early brood rearing season. Snow and mud make them non-usable for much of this period in most years. Furthermore, there is little use of many areas during this period, because most use occurs in the summer and fall during hunting seasons or pre-hunt scouting trips. The primary exception is discrete mines which impact a small portion of most areas. Seasonal activity levels are important and must always be considered in management decisions. Mere presence or absence is only part of any equation.	GB	Both	rmc0067GB
157.	We become concerned by general statements such as "Roads have multiple impacts on wildlife in terrestrial ecosystems". While true, the focus should remain on known, documented impacts to sagegrouse, their probability of occurrence and the effects on population size and persistence, not the effect on individuals. There appears to be very limited documentation about collisions between vehicles and sagegrouse and that single paper did not provide any information about the context of the situations where collisions occurred. The conditions may have been quite specific and may not exist in many areas. A one size fits all rule would be inappropriate.	GB	Both	rmc0067gb
158.	Many of the people or groups that petition the government to add various species to the endangered species list don't even live in Idaho or in the West for that matter. Please keep Idaho lands free from needless travel restrictions and reject those that try to use these blatant tactics of preventing Idaho citizens of accessing their public lands.	IDMT	Both	emc0036GB

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159.	More road and trail closures in Southern Idaho is not necessary to protect Sage Grouse & their habitat. I want to point out that saving our wildlife resources is just as important to us as it is to The BLM but not if it means we can't enjoy the area too.	IDMT	Both	emc0122GB
160.	I have been riding in Southern Idaho for the past 30 plus years and I haven't finish exploring the area either. I strongly believe more road and trail closures in Southern Idaho are not necessary to protect Sage Grouse & their habitat.	IDMT	Both	emc0122GB
161.	Road densities and traffic in Sage Grouse areas are low, but roads that exist are important to access recreation, sightseeing, and cultural opportunities.	IDMT	Both	emc0122GB
162.	In Southern Idaho, the Forest Service has mostly completed it's Travel Management Plans (TMPs). In South-western Idaho the BLM has completed their Travel Management Plan for the areas most popular with OHVs. Addressed in those TMPs were the issues with Sage Grouse habitat and appropriate roads and trails were closed or subject to seasonal closure. We do not need additional roads/trails to be closed!	IDMT	Both	emc0122GB
163.	First, in Idaho the Forest Service (FS) has completed Travel Management Plans (TMPs) for nearly all the National Forest lands in the state, and most neighboring states are doing the same. These TMPs addressed issues that OHVs and their continued use of roads, trails, and areas might have on all plants and animals in the ecosystem. Where the FS deemed it appropriate, roads, trails, and areas were closed to OHV use to protect sensitive species.	IDMT	Both	emc0124GB
164.	The BLM has also completed TMPs for the areas in northern Owyhee County in southwest Idaho that are most popular with Off-Highway Vehicle (OHV) users. These areas (in part known locally as the Owyhee Front) also saw roads and trails closed, as well as subject to seasonal closures, specifically to avoid disturbance of Sage-Grouse leks. The Owyhee front does not have a high amount of Sage-Grouse habitat, the terrain being made up of sand washes, rocky hills and relatively few open flat areas suitable for leks. However southern Owyhee County is more wide-open and has a much higher number of Sage-Grouse and leks. This area receives much less OHV traffic as it is very remote and far from large population centers. Southern Owyhee County also recently saw the creation of roughly half a million acres of new Wilderness areas. The legislation that created the Wilderness areas closed many miles of historically accessible roads to all mechanized vehicles. The roads and trails that remain open in the Owyhee desert have been on the ground for years and are important to access cultural and historical sites, as well as scenic opportunities.	IDMT	Both	emc0124GB
165.	My overall point is that while I agree that keeping the Sage-Grouse off of the Endangered Species list is very important for both the Sage-Grouse and the people who live in and visit public lands in the region, I do not feel that further closures of roads, trails, and/or areas to OHV use is warranted. I do not feel that OHV use is responsible for the decline in Sage-grouse populations or the loss of their habitat and that the current TMPs and other regulations currently in effect are sufficient to keep OHVs from impacting Sage-Grouse and their habitat. Thank you very much for the opportunity to comment on this issue.	IDMT	Both	emc0124GB
166.	We do not believe that more road and trail closures and eliminating will restore Sage Grouse to the Southern Idaho area.	IDMT	Both	emc0145GB
167.	The National Forests and the BLM in these areas have completed Travel Management Plans (TMPs) that limit access and cross country travel by OHVs. The roads that remain are very important to access recreation, sightseeing, hunting, and cultural opportunities. Issues with Sage Grouse habitat were addressed in those TMPs and roads and trails that affect	IDMT	Both	emc0145GB

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	the Grouse were closed or were subject to seasonal closures. All of the remaining roads and trail have established for decades and have historical use long before Sage Grouse populations were an Issue.			
168.	Actions taken to-date and proposed by the Dillon LWG The Dillon LWG, in addition to holding regular meetings, has undertaken several actions to assist sage-grouse conservation: - encouraged the BLM to implement some road closures and rehabilitation, and fence removals and marking in the Reservoir Creek allotments	IDMT	Both	rmc0028GB
169.	In the CMR NWR draft CCP and EIS (2010), a map on page 223 identifies sage grouse leks on the CMR Refuge. A map on page 305 identifies roads. These maps correlate. The RMP should propose a study to determine if leks are statistically more likely to be within a mile of a road.	MT-RM	Both	emc0013RM
170.	travel and transportation: Roads contribute to habitat loss and fragmentation of Sage Grouse habitat. We recommend that the EIS incorporate conservation measures to address this threat. No new roads should be permitted in priority habitats. And redundant or unneeded roads should be closed and rehabilitated. The agencies should impose seasonal restrictions on road travel close to leks and other priority habitats where disturbance is harming Sage Grouse or damaging habitats. And the agencies should permit vehicular travel only on designated roads and trails in all habitats.	NVCA	Both	emc0283GB
171.	The Area is Crisscrossed by Frequently Used Roads: The Hog Ranch project area has a very dense road network that is utilized by ranchers, hunters, off-road ATV and other recreationalist. During the spring through the fall seasons, many people camp here because the area has excellent access. It is even accessible for 2-wheel drive vehicles. The significant level of human activity in the Hog Ranch area likely deters significant sage-grouse inhabitation.	NVCA	Both	emc0287GB
172.	We are also concerned about targeting pinyon-juniper without an understanding of historical deforestation, and the fact that in many areas, pinyon-juniper are in reality the climax vegetation on a site. It appears much easier for agencies to promote expensive tree killing projects, rather than address the extensive degradation caused by livestock grazing, roading, or other disturbances throughout Nevada's sagebrush habitats.	NVCA	Both	emc0411GB
173.	Considering the miles of highway that ODOT is responsible for and how road rights-of-ways are addressed in the ODFW report, it should be obvious that ODOT is very concerned with how existing and future highway facilities and material sources will be addressed within this management plan. Based on the findings from several recognized studies, ODOT believes highway related activities within existing rights-of-way should be exempted from added scrutiny based solely on habitat for greater sage-grouse.	OR	Both	emc0155GB
174.	Sage-grouse generally do not prefer to occupy habitat near high volume roads (Lyon and Anderson 2003, Connelly et al. 2004, Aldridge and Boyce 2007). The majority of ODOT managed transportation facilities are major highways and freeways with relatively high traffic noise (up to 90 decibels). Connelly et al. (2004) indicated there were no active sage-grouse leks within 2 kilometers (km) of Interstate 80 across southern Wyoming and only 9 leks were known to occur between 2 and 4 km of I-80. ODOT biologist have conducted numerous environmental reviews and surveys over the years for transportation projects and associated material sources and have not encountered greater sage-grouse or identified areas of active use by these birds. Over the course of the last decade ODOT has been collecting data on collisions between wildlife and motor vehicles. Over this period no incident of sage-grouse killed by vehicles along ODOT transportation facilities has been recorded. ODOT believes that existing traffic, noise and disturbance along these transportation corridors generally precludes sage-grouse presence within the existing highway right-of-way and	OR	Both	emc0155GB

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	likely the areas immediately adjacent. Therefore, ODOT transportation corridors and their associated right-of-way should be exempt from any sage-grouse restrictions or exclusions.			
175.	In the Plan, the threat of road densities is addressed only indirectly. Again, ODFW should have used the best available science to study the impacts of roads and road densities with respect to habitat fragmentation. On BLM lands, Oregon-based groups and individuals have documented numerous miles of unnecessary primitive routes that are not in regular use, but continue to impact sage grouse habitat—BLM should incorporate this information into land use planning.	OR	Both	emc0385GB
176.	Address Impacts of Roads: Roads and trails impact sage-grouse habitat through weed invasions, habitat fragmentation, and increased activity. To improve sage-grouse habitat, BLM must prioritize limitations on roads and restoration of unused or harmful roads.	OR	Both	emc0385GB
177.	The area between the Little Sahara Rec. area and the mountains to the north has been used for years by the OHV community. The trail density is quite high there. I really feel that this area would not be good habitat for Sage Grouse. The even more alarming part is that there are not any Sage Grouse in the area, so I'm a bit confused as to why this area is even being considered.	UT	Both	emc0111GB
178.	Garfield County possesses numerous valid existing transportation rights on federal lands. Inasmuch as federal plans are to be consistent to the maximum extent allowed by law with local plans and are subject to valid existing rights, Garfield County requests inventory, evaluation and consideration of transportation rights as part of the plan.	UT	Both	rmc0006GB
179.	Under Utah State statute, Garfield County has jurisdiction and management responsibilities for off-highway vehicle management and recreation. Garfield County requests that its plans, program and policy be addressed as part of the analysis and that the Sage Grouse Plan be brought into consistency with the local plan to the maximum extent allowed by law.	UT	Both	rmc0006GB
180.	If road closures for a time period during the year is considered then the lease holder and local landowners must be allowed to travel the areas roads as needed for maintenance and livestock needs. Their travel cannot be limited to certain times of the year if they have ranching requirements that must be met. The same must be taken into consideration for trailing, branding, docking, feeding, calving and lambing of livestock, as well as irrigation and summer hay cutting. These ranching activities all occur with regularity within the time frame of the courting and nesting of the sage grouse(March 1-June 30) The ability of the landowner and lease holder to adequately calve or lamb and take care of their livestock must be placed in the forefront as well. It is possible to take into the consideration the management and conservation of a species without causing undue hardship on landowners living in the area. Landowners are limited by area landscapes and habitats as well when it comes to adequately protecting newborn livestock. Their livestock management plans are made well in advance each year and for the most part cannot be easily changed. Corrals, barns and other facilities needed for livestock cannot be transported to far away pastures for shelter and convenience. Some pastures are used at the same time each year for the specific reason that they will help provide nourishment and shelter to a landowner's livestock from storms during the spring of the year.	WY	Both	emc0050RM
181.	Patrol during hunting season to prevent (OHV) vehicle use in core sage grouse habitats. The hunting seasons are the time of the year when most off road activity occurs. Post signs as well stating no off-road use during the rest of the year	WY	Both	emc0050RM

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	in specific areas. Make the fines for purposely traveling off road through - (well posted areas using-maps and signs) core habitat for sage grouse be significant. A $300 dollar fine is not nothing to many people whereas $500 or more then people will take notice.			
182.	iii. Strong components of Wyoming's approach Within core areas, stipulations on BLM, FS, Wind River Indian Reservation, and State of Wyoming lands limit the number of projects and the amount of allowed disturbance (no more than 5%13) allowed per square mile or 640 acres. Surface disturbance is prohibited within a 0.6 mile buffer around active leks (no surface occupancy - NSO), which includes roads during the breeding, nesting and brood-rearing periods (mid-March through end of June). In addition, a March 15 to June 30 timing limitation stipulation is required within nesting habitat within 4 miles of leks. Main roads used to transport production and/or waste products must be more than 1.9 miles from the perimeter of occupied grouse leks. Other roads used for access or maintenance must be more than 0.6 miles from the perimeter of occupied leks. Noise levels at the perimeter of a lek should not exceed 10 dBA above ambient noise from 6 pm to 8 am, so as not to disturb breeding activities (March 1 - May 15). Finally, proponents of new projects are expected to coordinate with the permitting agency and WGFD biologists to determine which leks need to be monitored and what data should be collected/reported. The Executive Order clearly identifies thresholds and outline adaptive management responses if declines in sage-grouse numbers occur14. However, in non-core areas, the EO recommends a 2-mile seasonal buffer around occupied leks and a 0.25 mile NSO buffer around active leks. Research has shown that the latter stipulation is inadequate and scientifically without merit. In addition, a surface disturbance cap is lacking from non-core area stipulations	WY	Both	emc0089RM
183.	In winter, sage grouse select large expanses of sagebrush with gentle topography and avoided conifer, riparian, and energy development (Doherty 2008). Well density had an additional effect in this study (id.). Sage grouse were 30% more likely to use winter habitat if CBM development was not present (id.). There was a landscape-scale effect of habitat selection, with areas with greater sagebrush at a 4 km2 scale receiving greater winter use (id.). Carpenter et al. (2010) found a similar relationship in Alberta, and found that grouse avoided oil and gas wells by 1.9 km and also showed some avoidance of jeep trails. Bruce et al. (2011) found that sage grouse moved widely across winter habitats, using an area of 1,480 km2, and recommended setting aside large reserves for winter habitats. According to Doherty (2008:22), "Identifying and setting aside areas of undeveloped, high-quality habitat within the project area should be top priority." Doherty (2008:22) asserted, "My spatially explicit winter habitat model can be used to identify areas in the PRB that provide the best remaining habitat for sage-grouse in winter." BLM should apply this model to the Powder River Basin and place areas predicted to be the best remaining sage grouse winter habitat off-limits to future oil and gas leasing, in addition to placing strong restrictions on the level of development that is allowed on existing leases. Similar protocols should be developed and followed throughout the remainder of the sage grouse range.	WY	Both	emc0343GB
184.	I have worked very hard with my local BLM Office, Blaine County and other stakeholders on a new Travel Plan for the Shoshone District. I hope that a Blanket Policy to protect Sage Grouse does not affect all of the work we have put into our Travel Plan.	WY	BLM	fle0004gb

Table C-9.A
Comments Related to Travel Management

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185.	As a Wyoming resident, some of the recommendations concern me greatly. Here in WY, the outdoors isn't just for recreation, but it is our way of life. We all recognize that we share the area with all endemic species, but to risk the loss of use of OUR land because of some questionable "science" is an outrage and a folly. According to available literature and studies there is little information related to the effects of motorized recreation on the Grouse. Based on current science it appears that motorized recreation in, any of its forms, does not have an significant impact on the Grouse.	WY	Both	fle0012gb, fle00009rm

Table C-9.B
Comments Related to Recreation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	3) Sage grouse protection areas should also be "No Shooting" zones, or at the least, ban the use of lead-based ammunition in those areas. Since insects and forbs are important during a sage grouse brood's first month of life, they obviously forage on the ground for ants and beetles. It would be likely they would be susceptible to lead poisoning from lead shot or other lead based ammunition. You need healthy broods to stabilize the sage grouse population.	All	Both	emc0011GB
2.	In a time when fewer and fewer people are getting out and recreating on our public lands, (proportionately) it seems a moot point to close lands to the public for possible protection of a hardy species. Closures are the easy solution. The trick is coexistence with man and his machines. How about rationing? Power sports on even numbered dates only? Weekdays only? Cant we compromise for solutions which protect and preserve for fauna and flora as well as recreationists.	All	Both	emc0041RM
3.	If man and his machines are abusive, and I as one I do hear stories, why do I see such a lack of patrols? If you are forced by the political process to keep your lands open to us "barbarians" why not get out from your desks and do some patroling to protect? The private timber companies have simply closed us out due to abuses by people. You on the other hand are mandated as a public land manager. So I challenge you to get creative. And PLEEZE do not tell me "no funds". That just makes me think you are shallow and unimaginative and "institutionalized" beyond hope.	All	Both	emc0041RM
4.	My concern is that if grazing is restricted unreasonably on BLM or Forest Service lands then grazing permittees and private landowners may sell out to recreational users whose activities may be more detrimental to sage grouse than grazing.	All	Both	emc0054GB
5.	RECREATION ISSUE: The proposed Conservation Measures fail to address impacts of individual OHV trails and subsequent two-track roads that impact sage grouse and sage grouse habitat. Discrete anthropogenic disturbance via highways and gravel roads has been identified as an important issue for sage grouse habitat in the Conservation Measures. Overall objectives talk about limiting roads and specific objectives talk to limiting road disturbance to 3%. The Conservation Measures entirely overlook the impact of OHV trails left by individuals using public and USFS administered lands. Are these really to be categorized as diffuse disturbances, along with livestock grazing? Individual user OHV trails mechanically damage sagebrush, disturb nesting and brooding, destroy riparian vegetation and drain wet areas through capillary action. In lowmid elevation areas, OHV trails lace every drainage and ridgeline. Low elevation lands are a web of fragmented, small polygon areas that can't function as sage grouse habitat. Nearly every low-mid elevation riparian area in Nevada potentially used by sage grouse for brooding is impacted by individual use OHV trails on BLM lands and USFS administered lands. OHV trail mileage is expanding exponentially on BLM land. When use is controlled on USFS administered lands through "closed unless posted open" designations, OHV users come to BLM lands where everything is open except a few areas posted as closed. Seemingly harmless one-time passes through an area by OHV's go on to become full-blown roads in a few short months that are accessible to vehicles. Individual OHV trail / roads systems force the issue of discussion on patch size. The case can't be made that webs of OHV trails and two-track roads don't impact sage grouse and sage grouse habitat no matter which label, discrete or diffuse, these fall under. Measures must be amended into the LUPs that would manage OHV trail proliferation.	All	Both	emc0083GB
6.	ISSUE: Use of "No Shooting" Designations on large tracts of land. The USFWS has stated that hunting isn't an identified threat to sage grouse. Although species of wildlife hunted and hunting seasons are within the authority of the state's	All	Both	emc0083GB

Table C-9.B
Comments Related to Recreation

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	wildlife agencies, there has been a move in several states by federal land management agencies to enact "no shooting" regulations on large areas of public and USFS administered land, not just in urban interface areas. This type of regulation is being done to end or severely curtail hunting on public / USFS administered lands. Large areas subjected to this regulation could eliminate the opportunity for significant state DOW funds used for census and for federal / state matching funds for sage grouse. In some states, these significant funds are critical for Challenge Cost Share matches with federal land management agencies. The substantial Pittman-Robertson funds available to state wildlife agencies are based on hunting license sales for game species of wildlife. State wildlife agencies must be able to spend these funds on census and habitat improvement on public lands. Funds spent on habitat improvement for sage grouse or other game species act an umbrella to benefit a wide variety of game and non-game wildlife species including sage grouse. LUP amendments should include a recommendation for the conservative use of and interdisciplinary team review of "no shooting" designations.			
7.	We understand the need to amend your land use plans for sage grouse. We do have concern on the impacts to recreation particularly equestrian use. As you can see from our purposes listed above we are dedicated toward low impact on the land (Leave No Trace).We strive to educate equestrian users on the safe and wise use of horses as well as how we can limit impacts on the resources. We would comment that we have not been able to find any research that would show that equestrian use is detrimental to sage grouse and any limit on this use should be determined from sound research. We would like to be included on your mailing list so that we can continue to contribute to this public process	All	Both	emc0094GB
8.	Please consider the needs & concerns of the OHV Community in your decision making process	All	Both	emc0134GB
9.	Recreation impact activities on public lands including hunting and off-road vehicles needs to be looked at closely	All	Both	emc0135GB
10.	Recreation. The effects of off-highway vehicle (OHV) on sage-grouse behavior and populations are poorly understood. With the advent of deer and elk antler collecting, important winter sage grouse areas are seeing increased impacts primarily from OHV usage. The planning strategy should address recreational uses and provide guidance in critical sage grouse ranges.	All	Both	emc0142GB
11.	am very concerned that people could be criminally prosecuted by simply utilizing their own private land or for accessing public lands. It appears that people who enjoy off-roading would face the brunt of greatly reduced access or completely denied access to such lands.	All	Both	emc0144GB
12.	Your maps showed recreation sites and National Historic and Scenic trails. You need to address what you are going to do about dispersed recreation, eco-tours, etc. over the years to come, as recreation and tourism and their impacts keeps expanding. I feel there will be more impacts there in the future, then at the existing recreation sites.	All	Both	emc0149GB
13.	As a quiet human powered form of recreation bicycles have impacts on wildlife that are comparable to any human activity. Studies involving bison, mule deer, pronghorn antelopes, desert bighorn sheep, European alpine chamois and American bald eagles suggest that mountain bicycles and hiking have similar impacts on wildlife.1 The 2010 Determination for the Gunnison Sage-Grouse as a Threatened or Endangered Species indicated that all recreational activities have potential to adversely effect the species and habitat, but that did not pose a significant threat. We concur in this statement. Unmanaged always has the potential to create adverse impacts to our natural environment and the	All	Both	emc0150RM

Table C-9.B
Comments Related to Recreation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	wildlife that inhabits it. However, thoughtful management can avoid those potential effects while still allowing the public to experience these environments.			
14.	In the case of the Greater and Gunnison Sage-Grouse mitigation measures such as seasonal and or time of day limitations can avoid disturbing the lekking process. Careful attention to trail routes can avoid fragmentation of critical habitat and avoid leks. Trail construction techniques can be used as a framework for enticing/encouraging trail users to conform their behavior to the desired conditions. All of these measures should be considered prior to resorting to outright prohibitions.	All	Both	emc0150RM
15.	Americas public lands are the core of the outdoor recreation economy and tourism industries. The wildlife that inhabits them are an essential component of what makes them special. Careful management and planning can ensure that these places and creatures are protected while still allowing people to experience them.	All	Both	emc0150RM
16.	Closing the established OHV trails will only stop the law abiding people from going out in those areas. It will NOT stop the poachers or others that are causing problems with the wildlife and habitat. Allowing the ATV riders to continue using the trails, they might keep the poachers out of the area for fear of being caught. And they can and will report any problems that they see to the proper officials.	All	Both	emc0175GB
17.	I was born and raised here in Idaho. I love my state. Do you know why? Because I like to get out, and I have the ability to head for the mountains or desert almost every weekend of the year either, hiking, mtn biking, hunting, fishing, camping, motorcycle riding, snowmobiling, etc. My family and I love being outside whether it be backpacking into a pristine backcountry lake or blazing down the trail on my dirt bike to the next check point. Recreationalists like myself are the best conservationists of the land, and we are always respectful of other people and especially the animals that live here. Integrity, doing what is right...Educate the uneducated, do not limit peoples rights to recreate how they choose on Federal Public Land.	All	Both	emc0185GB
18.	According to available literature and studies there is little information related to the effects of motorized recreation on the Grouse. Based on current science it appears that motorized recreation in, any of its forms, does not have any significant impact on the Grouse.	All	Both	emc0199GB
19.	Because ATV use has increased dramatically in the past several years, there needs to be an aggressive training and enforcement policy to reduce illegal ATV use. Legal roads need to be clearly marked and illegal roads need to be barricaded. Enforcement efforts need to be increased, especially during the hunting seasons to reduce the damage being done by ATV's.	All	Both	emc0217GB
20.	More specifically we need land to recreate in. these are all our lands and only a few young, strong folks can get out and hike. I am 60 and we choose to ride OHV as a FAMILY to enjoy our land	All	Both	emc0224GB
21.	The NOGA members operate under the conditions provided in their Special Recreation Permits (SRPs) and we would like to be included in any decisions that determin which SRPs have neutral or beneficial affects to priority habitat areas. Most of our activity is focused on summer and fall recreation; therefore, it does not occur during breeding or nesting periods.	All	Both	emc0239GB, emc0095RM
22.	Significant sage grouse habitat overlaps with BLM special designations. The plan amendment process must include a No-Action alternative, which recognizes the fact that federal land use plans contain existing direct and indirect	All	Both	emc0242GB

Table C-9.B
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	protections of sage-grouse habitat (including wilderness areas, national parks and monuments, wilderness study areas, areas of critical environmental concern, special recreation management areas, roadless areas, wild and scenic rivers, NSO areas and others). The EIS must examine the extent to which such existing protections, or modification of such protections, can accomplish the purpose and need for the plan amendments.			
23.	Sage grouse habitat conservation measures should not preclude the use of certain BLM lands for OHV recreation. Any losses of OHV recreational lands should be mitigated by provision of additional lands outside of priority habitat and enhanced recreational facilities.	All	Both	emc0242GB
24.	5) Consider the effect of recreational use on grouse and their habitats. The random hikers with their unleashed friends, the loosed camp dog from a mountain bike camp, the family with campfire, hot dogs and 22's target practicing or casual groups taking pictures or just exploring with their Labradors afoot to the horse camp with blue healers beating the sage brush: education on what a grouse is and where it lives and what a few loosed dogs from a Subaru station wagon can do to a nesting hen and her not yet or newly hatched chicks is called for. The kiosks at trails heads, campgrounds to 30 second blurbs on TV, school programs and information placed on maps, web sites and publications. Who is a sage grouse and where does he live? Why wouldn't I turn my dog loose in a high desert floor? These and other secrets need to be shared to protect the sage grouse habitat. Ignorance of the public is at fault but lack of information dissemination lies in the agency's lap.	All	Both	emc0257GB, emc0104rm
25.	In the Recreation section, page 12, there is discussion of recreational activities in sage brush habitats. While it may seem counter-intuitive, in order for these areas to be avoided, there needs to be notice to the public of which areas to avoid. The statement is made that "Off-trail users can fragment habitat and create corridors for spread of exotic plant species." Federal, State and local regulations already prohibit off-trail uses by OHV's, except in special circumstances.	All	Both	emc0271GB
26.	Recreational use of sagebrush lands can have negative impacts on sage-grouse. The use and increasing fascination with off-highway vehicles ("OHVs") is of great concern, and has led directly to sage-grouse habitat loss and fragmentation. It also poses a threat to vegetation, an increase in noise causing stress and possibly extirpation, and direct mortality from collisions. Indeed, recreational use of OHVs is one of the fastest-growing outdoor activities. As an example of how this new form of recreation has been affecting wildlife, the Fish and Wildlife Service states that use of OHVs has been a primary factor of concern in 13 percent of species listed or proposed for listing under the Endangered Species Act.	All	Both	emc0276GB
27.	Indirect effects of OHV use include facilitating the spread of invasive species. Additionally, all recreational use of sagebrush lands leads to an increase in human presence, which can lead to stress, avoidance, and impacts on sage-grouse populations and overall survival rates. Additionally, although OHV use is legally limited to roads or trails on some public lands, illegal cross-country use is a reasonably foreseeable impact of considerable concern.	All	Both	emc0276GB
28.	The effects of OHV use on sagebrush and sage-grouse have not been directly studied, and thus there is a lack of information on how to best control and avoid impacts associated with OHV use. This lack of information also makes it extremely difficult to estimate the impacts of OHV use on sage-grouse habitat and populations.	All	Both	emc0276GB
29.	With the increased popularity of ATV recreation and the interest of gathering shed antlers many people and family pets (dogs) are impacting the nesting area of these birds.	All	Both	emc0295GB

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30.	Further, arterial roads can have significant impact on wildlife, whereas low speed two track trails and single track trails usually has little or no impact on wildlife. In this case if low volume low cost roads and/or trails are closed, opportunities for recreation will be lost with little or no benefit to the grouse. Livestock producers will lose grazing opportunities. Hunters and fishermen will lose their favorite spots. Off-highway vehicle users will lose riding opportunities. Industries in rural areas that tend to be productive support local economies will close. Western small communities with their ranch, tourism and natural resource economies would be hard pressed to support these efforts even though they enjoy sage grouse with parameters that could be so far reaching. As most wildlife managers know, public support is vital to completing their mission.	All	BLM	emc0313GB, emc0127RM
31.	For example, if OHV trails or recreation areas face closure due to the sage-grouse conservation efforts, we hope the agencies will engage with local OHV organizations before finalizing any plans. Having a dialog with these groups in an effort to minimize such closures and to explore suitable alternatives for OHV recreation will facilitate acceptance and compliance with new land management restrictions	All	Both	emc0324GB
32.	We note that BLM's own documents identify the common threats to the sage-grouse habitat. In the Great Basin Region it is the threat of wildfires and in the Rocky Mountain Region it is energy development. OHV recreation does not provide a threat and therefore it should not serve as a remedy in dealing with this issue.	All	Both	emc0324GB
33.	We are concerned that the Notice specifically calls out off-highway vehicle (OHV) management and recreation as a preliminary issue, particularly as supporting documents from the U.S. Fish and Wildlife Service (FWS) cite other factors as the primary threats to the species. For example the FWS Fact Sheet on Endangered Species Act Listing Decision for the Greater Sage-Grouse dated March 5, 2010 notes; "The Service analyzed potential factors that may affect the habitat or range of the greater sage-grouse and determined that habitat loss and fragmentation resulting from wildfire, energy development, urbanization, agricultural conversion, and infrastructure development are the primary threats to the species." While we understand that on the local level There may need to be consideration of how OHV trails and areas impact the sage-grouse on a case-by- case basis, there seems to be little science supporting OHV use as a substantial factor affecting overall sage-grouse populations.	All	Both	emc0330GB
34.	Further, we question why OHV recreation would be called out as a preliminary issue, despite not being a primary threat to the species as noted above, instead of simply identifying recreation, motorized or non-motorized.	All	Both	emc0330GB
35.	Lastly, we cannot help but question a notice that calls out OHV recreation as a preliminary threat to a species that warrants endangered species protection, but does not even mention that hunting of that species remains legal in some impacted states. If this species can be protected while it is being lawfully hunted we respectfully submit that it can be protected without wholesale closures of public lands to multiple uses.	All	Both	emc0330GB
36.	The BLM must also consider the effects of its decisions upon the ability to produce oil and gas, and to create a viable oil shale industry, and upon the tourism industry and recreational pursuits of those who live in Utah.	All	Both	emc0337GB
37.	In addition to the issues listed in the accompanying informationI encourage the evaluation of the following in all analyses of the environmental impacts of actions on federal lands. When looking at the impacts of recreation, consider the impact of lek viewing activities. With expanding interest in sage grouse, over-zealous viewers and photographers frequently disturb birds	All	Both	emc0338GB

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38.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Greater sage grouse and habitat used by the species can be negatively impacted by dispersed recreational activities.	All	Both	emc0343GB
39.	Sage grouse do not use cheatgrass. Invasive species was identified as a threat to sage grouse by three expert panels and in recent reviews (Connelly et al. 2011, Table 1). One panel listed cheatgrass as the most important threat to sage grouse in the western portion of its range (70 Fed. Reg. 2267), where it has invaded much of the lower elevation, xeric sagebrush habitat (Miller et al. 2011). Land uses such as livestock grazing (Reisner 2010), off-road vehicle use, and coalbed methane development (Bergquist et al. 2007), can facilitate cheatgrass incursion in sagebrush steppe.	All	Both	emc0343GB
40.	General Comments on the December 21, 2011 report from the Sage-grouse National Technical Team A Report on National Greater Sage-Grouse Conservation Measures An alternative based on the Report will go far beyond what is required by the Purpose and Need. The Report fails to adequately incorporate the successful efforts by the local sage grouse working groups and may stop effective efforts that are currently underway. It places arbitrary and capricious limits on recreational activities (roads and trails) as well as water developments. It would also direct the agencies to retire grazing allotments, which is currently prohibited by law. Additional alternatives should be developed to respond to these and other concerns	All	Both	emc0345GB
41.	Sage-grouse habitat conservation measures should not preclude the use of certain BLM lands for Off Highway Vehicle (OHV) recreation. Any losses of OHV recreational lands should be mitigated by provision of additional lands outside of priority habitat and enhanced recreational facilities.	All	Both	emc0376GB
42.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following conservation measures in the relevant Resource Management Plans and Land Management Plans.Manage dispersed recreational activities to avoid, reduce and, where possible, eliminate displacement of greater sage-grouse or negative impacts to greater sage-grouse habitat.	All	Both	flb0000gb
43.	Regarding recreation, the plan amendments should direct local land managers to cooperate and coordinate with local governments and affected stakeholders to establish achievable goals for protection of the Grouse (lek /nest disturbance, wintering areas and sage habitat degradation) and to mitigate potential affects upon recreation through closure of existing, inventoried and managed routes.	All	Both	flb0000gb
44.	The amendments should recognize that local agency recreation planners and managers are the best suited to work with motorized stakeholders to establish a manageable, designated, user and nature friendly route network for motorized access. This includes access roadways away from paved highways; high clearance routes for pickups, jeeps and other 4WD vehicles; that can be shared under mixed-use by other OHV categories such as trail bikes, ATV/UTV and/or OSV in the winter. Just as important to the motorized community are rural 2 track routes, ATV width trails, and trail bike single-track width routes.	All	Both	flb0000gb
45.	Any plan amendment should include adequate site-specific analysis on anticipated impacts of motorized and non-motorized recreational activities, which often have little to no impact on wildlife. The impacts of motorized and mountain bike routes that are primarily used for recreation should not be "lumped in" with highways and other high-speed access roads.	All	Both	flb0000gb

Table C-9.B
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46.	The analysis should also disclose impacts of the hunting of the Grouse, which is still allowed in at least 8 of the 11 states where it is found. Importantly, Sage Grouse conservation efforts such as seasonal restrictions and bag limits have been quite successful in maintaining healthy populations. The same has been shown for motorized access and use. For example, Grouse leks are concise, well-established, historic areas that can last for decades. Add to this that leks are mostly in use for strutting/mating during crepuscular hours and that motorized recreation is generally NOT undertaken during those hours...the two can be successfully separated.	All	Both	flb0000gb
47.	Manage dispersed recreational activities to avoid, reduce and, where possible, eliminate displacement of greater sage-grouse or negative impacts to greater sage-grouse habitat.	All	Both	flb0000gb and rm
48.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following conservation measures in the relevant Resource Management Plans and Land Management Plans.	All	Both	fle0000gb
49.	I strongly oppose components of the 2010 Conservation Measures that lack the flexibility to adapt to local management issues. The plan should recognize the importance of Off-Highway Vehicle (OHV) recreation to the local economy, the local and outside populations desire for OHV recreation, and the minimal impact that slow moving OHVs have on wildlife.	All	Both	fle0000gb
50.	While the 2010 FWS listing decision specifically identifies fire suppression and oil and gas development as issues that are in need of regulatory improvements, the listing decision specifically identifies that recreational activities are of minimal impacts to sage grouse habitat. The Decision clearly states: "Although we anticipate use of pesticides, recreational activities, and fluctuating drought conditions to continue indefinitely, we did not find any evidence that these factors, either separately, or in combination are resulting in local or rangewide declines of greater sage-grouse.,,6	All	Both	rmc0033GB
51.	As noted elsewhere in these comments, the FWS listing decision does not take issue with the placement of viewing trailers in the vicinity of active grouse lek, despite the possibility of disturbance and the increase in motor vehicle traffic on roads adjacent to the viewing trailers. While the placement of a viewing trailer may cause disturbance, the FWS did not find this low level of disturbance a significant threat to the grouse.	All	Both	rmc0033GB
52.	The 2010 FWS listing decision discussed Colorado and Montana State policies to position viewing trailers adjacent to active grouse leks in order to allow for public viewing of mating and reproduction activities. Given the direct impact that a trailer with active visitor activity and associated motor vehicle traffic on arterial roads adjacent to active leks could have , if there were a concern regarding the recreational impact on grouse, it would have been raised in this discussion. The FWS states the placement of trailers in these locations is not a significant concern for the grouse.1S	All	Both	rmc0033GB
53.	The minimal impact of recreational activities on sage grouse activities is also specifically addressed in the 2006 Colorado Department of Wildlife's Greater Sage Grouse Workshop Committee Report, which identifies the top priority threats to the sage grouse as being Housing/Urbanization; Grazing; Predation; Hunting and Energy Development. 19 This report repeatedly classified possible recreational impacts to the sage grouse as a low priority/low risk issue.	All	Both	rmc0033GB
54.	Given the significant bodies of research that are available expressly addressing the limited impact that dispersed recreation has on the Grouse, the Organizations vigorously assert that the Conservation Measures must separate the impacts of arterial roads from the lack of impact from a dispersed trail system. This distinction is critical in resolving	All	Both	rmc0033GB

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	erroneous application of the currently proposed standard in a manner that will not benefit the grouse.			
55.	I understand that the Department of Wildlife (NDOW) will make public maps identifying the location of critical sage grouse habitat and sage grouse leks. The publication of these maps will provide hunters and the general public "target" areas where they will focus their recreational activities. These critical sage grouse habitat areas (and the sage grouse within them) will become even more impacted by unregulated off road use, increased public visitation, and disturbance by associated pets (e.g. domesticated unleashed dogs will become a nuisance to grouse). The EIS needs to identify the ramifications of the publication of sage grouse habitat and lek maps and estimate the additional damage to the habitat and harm to the species that will be created as a result.	All	Both	rmc0035GB
56.	According to available literature and studies there is little information related to the effects of motorized recreation on the Grouse. Based on current science it appears that motorized recreation in any of its forms does not have an significant impact on the Grouse.	All	Both	rmc0061GB, rmc0035RM
57.	Regarding recreation, the plan amendments should direct local land managers to cooperate and coordinate with local govemments and affected stakeholders to establish achievable goals for protection of the Grouse (lek /nest disturbance, wintering areas and sage habitat degradation) and to mitigate potential affects upon recreation through closure of existing, inventoried and managed routes.	All	Both	rmc0061GB, rmc0035RM
58.	Any plan amendment should include adequate site-specific analysis on anticipated impacts of motorized and non-motorized recreational activities, which often have little to no impact on wildlife. The impacts of motorized and mountain bike routes that are primarily used for recreation should not be "lumped in" with highways and other high-speed access roads.	All	Both	rmc0061GB, rmc0035RM
59.	The Proposed Planning Strategy indicates a potential for loss of access historically available for recreation, is a direct loss. There are also indirect impacts that would result should this Proposed Planning Strategy be approved and implemented causing further displacement of recreational activities. Those cost include, but are not limited to : (1) the increased enforcement required at other sites when displaced recreational users seek out other areas that may be poorly identified as wildlife preserves or other resource-rich areas; (2) the loss of biological resources or habitat at other sites that displaced recreational users may utilize; (3) the loss of nature education, (4) the loss of outdoor recreation opportunities, (5) the loss of outdoor access and experiences for children in the community; (6) the loss of familial traditions, custom, and culture of recreational and nature-oriented activities in the region ; and (7) the loss of the region's history and traditions, specifically with respect to mining and recreational activities.	All	Both	rmc0061GB, rmc0035RM
60.	There are competing pressures for use of public lands. The Proposed Planning Strategy is one of several that cumulatively have a negative impact on the public's ability to partake in recreational opportunities on public lands. The Proposed Planning Strategy should adequately evaluate and mitigate the cumulative losses of land for recreational opportunities, including but not limited to cumulative closures or limitations on public lands managed by Bureau of Land Management, the U.S. Forest Service, and other federal agencies.	All	Both	rmc0061GB, rmc0035RM
61.	Specifically, the data fails to support its claims that various recreational activities (e.g. , off-highway vehicle use, camping) pose significant threats to the Greater Sage Grouse. Such claims are highly speculative and based on little or no reliable	All	Both	rmc0061GB, rmc0035RM

Table C-9.B
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	data. Studies often cited in support of these claims, such as they are, were conducted many years ago and are outdated. Worse, those same studies either fail to stand for the statements attributed to them, or they violate basic rules of scientific analysis. That is, they (1) are biased in their methodology, (2) draw conclusions based inadequate sample size, (3) were conducted without sufficient "control" groups, (4) cannot be verified or repeated, and/or (5) are too small or localized to support the area-wide or population-wide extrapolations set forth in the subject document. A review of the underlying technical data for the Greater Sage Grouse reveals two things: First, no study so far conducted has established a causal connection between recreation activities and any perceived declines in the population. At most, the technical data show that some recreational activities, in some areas, have the potential to displace some species on a very local level. However, this cannot establish that recreational activities pose a substantial threat to an entire population or subpopulation of a particular species.			
62.	Middle Park Identified Issues The working group requests that the EIS analyze recreational impacts and conservation measures at a greater level than what was included in the NTT report. Grand County is advertised as 'Denver's Backyard'. This description captures the amount of recreational activity that occurs from residents and non-residents of Grand County. The NTT states recreational activities are benign unless they are excessive; however excessive use is occurring in Grand County and should be addressed in the EIS. Recreational activities identified by the MPSGWG as having potential negative impact (if not properly managed) to sage-grouse includes off-road vehicle travel, snowmobiling, hiking with dogs off leash, shed-hunting and lek viewing. The frequency, intensity and especially the timing of these activities will have the effect of disturbing birds, which can increase predation risk, increase risk of collisions with fences or power lines, and force birds into less desirable habitats. See the MPSG Plan on page 17 and the CCP document on page 191 for information pertaining to potential recreational impacts in Middle Park and Colorado. Recreational activities on BLM lands should be analyzed to determine if and where problems exists. Some recommendations to BLM to address the concerns of recreation may include but are not limited to focusing on lands identified for recreational activities or where BLM staff, CPW employees or landowners thinks a conflict may be occurring with sage-grouse habitat. If BLM is uncertain if a conflict between recreational users and sage-grouse are occurring they can deploy data loggers to users (White River National Forest West Vail Pass Lynx Study), conduct user surveys, or patrol an area to record user activities and numbers. If a problem is identified BLM could educate the users of the habitat sensitivity, put signs up explaining allowed uses, apply timing limitations or close areas that need protection. The dog off leash issue may be very site specific, however in Middle Park the working group believes that in certain areas (sites just northeast of Kremmling and a now inactive site near Granby) leks have been negatively impacted by pets, either under owner supervision or at large. Disturbance from dogs is also referenced in the MP Plan under the Predation and Urban Development sections. The CCP provides references to lek disturbance involving humans with dogs at the bottom of page 154 and the top of page 172. If specific sites are identified then the following actions could be proposed during the breeding season: place signs in the area to encourage dog owners to control their pets, increase patrol around identified sites or place wildlife closures to include human foot traffic. In addition, CPW has the legal authority to destroy dogs identified in the act of harassing wildlife if a problem persists and the pet owner does not take responsibility to control their dogs. This issue does not include working ranch dogs. Although BLM does not have the ability to direct	CO	Both	emc0063RM

Table C-9.B
Comments Related to Recreation

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	management on adjacent lands, the cumulative actions of other landowners will influence the behavior of the birds over the long-term, which may affect how they use BLM lands. This, in turn, may elevate the importance of maintaining suitable and quality habitat on BLM lands. For instance, increased housing development, one of the Tier-1 threats identified in the MPSG Plan and ranked issues table (Appendix I), may eliminate leks or destroy habitat, therefore adding pressure on adjacent BLM lands and making BLM lands even more important for protection. Recommendations to detect problem areas may include but are not limited to conducting an analysis using demographic data or county assessor data to identify housing pressures within some specified distance and density surrounding BLM lands.			
63.	Recreation: Viewing of leks should be discouraged if not prohibited and lek disturbance by government agencies should be held to a minimum.	CO	Both	emc0069RM
64.	The EIS should also consider impacts from predation and other uses such as ATV s, recreational 4X4s, mountain bikes, camping, hiking, horseback riding, and other recreation uses.	CO	Both	rmc0050RM
65.	Keeping the area open to ATVs/OHVs, especially organized clubs, may have a policing effect which can have a positive effect on the Sage Grouse and the historical artifacts in the area. All of our ATV Clubs promote proper behavior on our public lands and their involvement on our public lands helps police the behavior of others! Rather than shutting us out, in an attempt to help the Sage Grouse, ask for our help. We can and would help plant vegetation for the Grouse or help in other ways if you would just ask.	IDMT	Both	emc0122GB
66.	Agencies also issue permits for everything from OHV races that may intrude on and disturb sagegrouse habitats (Ely BLM Jake's Wash area for example) as well create new routes and promote erosion and gullying. There are various outfitting and commercial Wilderness adolescent rehab businesses that may disturb and impact sage-grouse throughout sensitive periods of the year, or degrade habitats in remote areas that are used often. Bennett Hills Idaho is an example of an area of concern for this disturbance.	IDMT	Both	emc0411GB
67.	New risk factors include: - increased recreation activity	IDMT	Both	rmc0028GB
68.	The County benefits tremendously from public lands recreation that includes, Special OHV Events to hunting, fishing, geocaching and touring of the public lands. We support maintaining these activities and are willing to coordinate with the BLM to ensure these activities are maintained in concert with conservation of the Sage grouse	NVCA	Both	emc0130GB
69.	recreation: The USFWS listing decision did not identify recreational uses of sagebrush country, including hunting, as a significant threat to Sage Grouse. However, it acknowledged that some recreational uses may have site-specific impacts on local populations. The EIS should include conservation measures to avoid or minimize harmful recreational impacts on either the bird or its habitat. Minimally, we recommend: a. the agencies issue no special recreation permits and impose seasonal/timing closures to protect leks and other priority habitats. B. the agencies should permit no off-road vehicular travel in priority habitats and exercise their authority to modify or cancel recreational permits in order to to avoid or minimize adverse impacts to Sage Grouse and priority habitats.	NVCA	Both	emc0283GB
70.	Agencies also issue permits for everything from OHV races that may intrude on and disturb sagegrouse habitats (Ely BLM Jake's Wash area for example) as well create new routes and promote erosion and gullying. There are various outfitting and commercial Wilderness adolescent rehab businesses that may disturb and impact sage-grouse throughout	NVCA	Both	emc0411GB

Table C-9.B
Comments Related to Recreation

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	sensitive periods of the year, or degrade habitats in remote areas that are used often. Bennett Hills Idaho is an example of an area of concern for this disturbance.			
71.	If the ODFW can provide a blanket exemption to the livestock grazing industry which does not apparently adversely impact Sage Grouse habitat, why can't they provide an exemption for future mining operations and permitting process which disturb less than 100 acres and Dispersed non-motor oriented recreation and all other activities which have not been shown as a Listing Factor?	OR	Both	rmc0036GB
72.	Seasonal Closures in the spring and summer, as proposed in the EIS must be considered carefully in order not to drive the Recreationist away. If I can go out to the desert only in the hot, dry dust of summer and late fall in east Oregon, then why would I choose it as a destination and place to play?	OR	Both	rmc0036GB
73.	With the increased popularity of ATV recreation and the interest of gathering shed antlers many people and family pets (dogs) are impacting the nesting area of these birds.	UT	Both	emc0296GB
74.	With the increased popularity of ATV recreation and the interest of gathering shed antlers many people and family pets (dogs) are impacting the nesting area of these birds.	UT	Both	emc0406GB
75.	Under Utah State statute, Garfield County has jurisdiction and management responsibilities for off-highway vehicle management and recreation. Garfield County requests that its plans, program and policy be addressed as part of the analysis and that the Sage Grouse Plan be brought into consistency with the local plan to the maximum extent allowed by law.	UT	Both	rmc0006GB
76.	Garfield County requests a detailed cost-benefit analysis be conducted in evaluating the decision's impact on development of fluid minerals, coal mining, hard rock mining, mineral materials, community mineral pits, recreation, off road vehicle use, and other land uses. Naturally, this will require evaluation of social and economic benefits/costs of current Sage Grouse populations and their impact on resource issues cited above.	UT	Both	rmc0006GB
77.	Patrol during hunting season to prevent (OHV) vehicle use in core sage grouse habitats. The hunting seasons are the time of the year when most off road activity occurs. Post signs as well stating no off-road use during the rest of the year in specific areas. Make the fines for purposely traveling off road through - (well posted areas using-maps and signs) core habitat for sage grouse be significant. A $300 dollar fine is not nothing to many people whereas $500 or more then people will take notice.	WY	Both	emc0050RM
78.	12) Manage recreation impacts on sage grouse where these activities are concentrated in important habitat.	WY	USFS	emc0144RM
79.	13) Promote appropriate grazing practices which maintain or improves sage-grouse habitat.	WY	USFS	emc0144RM
80.	Recreation, pesticides, parasites and disease are considered to be low priority factors at this time, but may become more important in the future as we come to understand the ecology of these small populations.	WY	USFS	emc0144RM

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	My concern is the economic impact the sage grouse reorganization of habitat will have on several states.	All	Both	cfc0003RM
2.	As the Department of the Interior moves forward with planning strategies, it is imperative to keep in mind the economics of the region. We as well as our constituents have been facing some tough economic times over the past few years. We will be monitoring any actions by the federal government that will have an adverse impact on jobs, energy development, grazing, mining or any other industry on public lands. With over 2.765.000 + acres in Fergus County and over a quarter of those acres being owned by governmental agencies, this causes us to be concerned on implementations that couid effect our economy and the way of life for our constituents.	All	Both	cfc0004RM
3.	Our communities need the revenue created from the agriculture and oil and gas exploration.	All	Both	cfc0005RM
4.	It is good for the tourist industry and will get better.	All	Both	cfc0008RM
5.	While it's impossible to gauge just how much the grouse's endangered species listing could cost the energy industry, many experts, including Interior Secretary Gale Norton, say the economic impact could be enormous. Stop the listing and have the BLM start managing MY land.	All	Both	cfc0017GB
6.	A federal judge instigated an uproar in 1989 when he issued an injunction on federal timber sales to protect many forests where spotted owls live.	All	Both	cfc0017GB
7.	NEPA was written to protect the "Human Environment" This forthcoming EIS must be written to protect the human environment. Economic and social impacts must be covered in depth protecting our livlihoods and our use of FEDERAL LANDS. Sec 1508.25 scope Scope consist of the range of actions, alternative and impacts to be considered in an EIS. Sec 1508.14 Human Environment "When an EIS is prepared and economic or social and natural or physical environmental effects are interrelated, then the EIS will discuss all of these effects on the HUMAN ENVIRONMENT."	All	Both	cfc0021RM
8.	Retirement of grazing privileges is not in the interest of securing the nation's food supply.	All	Both	cfc0024RM
9.	The Taylor Grazing Act's goal of stabilization has been superseded by the Endangered Species Act which raises the question: Is a candidate species more important than economic and social vitality or can they exist together?	All	Both	cfc0030GB
10.	First and foremost it is imperative that all applicable laws must be considered when proposing Sage Grouse management measures. Social and economic impacts must be considered and given priority to changes made strictly for grouse.	All	Both	cfc0032RM
11.	As this planning strategy moves through its process it needs to maintain a clear focus that the people who live in these areas with the sage gouse need consideration as well.	All	Both	cfc0035GB
12.	The destruction of the ranching and mineral extraction industries destucts communities and weakens our nation. Our natural resources are the life blood of our rural communities in most of the west. Locking up our resources with the expectation that we can just buy them from our nation is killing our country.	All	Both	cfc0035GB
13.	I fear that this endeavor is to create another "spotted owl" which is intended to cripple the rural economies of the western U.S. "shovel-ready" projects on public lands (e.g. mining, geothermal, etc.) already face a seemingly insurmountable challenge of environmental obstacles that kill or delay projects indefinitely. It appears that we are going to have more of the same. Job Killers…	All	Both	cfc0048GB
14.	Any changes that decrease or restrict multiple use will have a very negative economic ijmpact on our county residents.	All	Both	cfc0061GB

Table C-10.A
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
15.	I hope you will consider and take into account that if cattle grazing is regulated or restricted, this will have a huge impact on many rancher's lives and livelihoods. It could mean that ranchers that graze on public land would be forced out of business. That would be a sad event.	All	Both	cfc0069GB
16.	I support development of new energy sources in the United States, including the oil and gas reserves in Wyoming and Montana. But, I think we need to come up with some type of development fees in exchange for development rights, that could be imposed on property owners selling or leasing their lands for energy development, and imposed on the energy companies themselves that profit from this development. The money collected from these fees could be used to purchase other land to be set aside in perpetuity as habitat for species such as the sage grouse. (Also, these fees could be used to mitigate groundwater pollution that appears to be a result of the fracking process). If imposition of these development fees would require listing the sage grouse as an endangered species, I would be in favor of that too. The bottom line here is, we need new energy sources, and we need businesses to profit to maintain the economy and create jobs, but we also need to protect the environment. In exchange for profit, business and land owners must be held responsible for the costs of mitigation for harm to the environment.	All	Both	emc0001GB
17.	Much of sage grouse habitat is on private land. If economic and political factors encourage the ranch to try farming, this habitat will be lost to the plow.	All	Both	emc0013RM
18.	Whenever the RMP considers a course of action that could reduce the economic viability of a ranch, it should also consider whether that course of action would harm sage grouse by increasing the likelihood that the ranch would plow prairie, overgraze, or sell land to developers to compensate for the lost revenue.	All	Both	emc0013RM
19.	I strongly urge the Department of Interior and our Congressional Delegation to move in a direction to mitigate any interference in our rural commerce occasioned by endangered species, with major emphasis on the sage grouse, a bird that will florish despite any marginal economic development in Nevada where the highest unemployment rate in the nation is prevalent	All	Both	emc0023GB
20.	.. "the world population is seven billion and growing. Global agriculture production needs to continue growing at a significant pace to keep up with demand." so states the 2011 Global Agricultural Report. The report states that we need to double agriculture output in the next forty years. What does this mean to federal and state agencies managing our state and federal lands? The mind-set of limiting livestock grazing on federal lands need to be reviewed. Pressure will mount to harvest as much protein as possible. We need to do our share feeding the people of our world!	All	Both	emc0029GB
21.	The petition for listing the Greater Sage Grouse as an endangered species specifically targets two important western industries in particular. The energy industry, and the agricultural industry. Both of these industries are vitally important to the economy of our western states and vitally important to our small local economies as well. This fact cannot be emphasized enough. While both of these industries bear responsibility to manage their operations to provide for conservation of natural resources, we maintain that these industries have demonstrated that they are doing so. The regulatory environment in which these industries exist must retain flexibility in order for these industries to survive. The regulatory environment must also allow industry leaders and federal agencies the flexibility to develop adaptive management strategies to achieve the appropriate balance between the increasing demand for resources and conservation objectives.	All	Both	emc0032RM

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22.	I favor "economic" impacts/benefits over any & all "environmental" restrictions to preserve this species. You should be investing your time (and our tax dollars) on more significant species and issues…	All	Both	emc0052GB
23.	Although it appears from preliminary mapping that Mesa County includes very little, if any, priority habitat for the bird, as the economic regional center for western Colorado and Eastern Utah we are concerned about the potential negative socio-economic impacts of the measures suggested in "A report on National Greater Sage-Grouse Conservation Measures" produced by the Sage-grouse National Technical Team dated December 21,2011. Those conservation measures will have severe impacts on multiple uses of BLM lands and resources in the region that directly and indirectly impact the Mesa County economy, including energy development, tourism, recreation, grazing, etc.	All	Both	emc0053RM
24.	We ask the BLM to include a detailed and thorough socio-economic impacts analysis of alternative conservation measures in the EIS. All recommended conservation measures must be supported by research based science in order for the EIS to be a credible document.	All	Both	emc0053RM
25.	You also need to strongly consider the real economic impacts of your decisions. Your decisions impact much more than local jobs, tax revenues, schools, infrastructure, etc. You need to consider the cumulative impact your decisions have on creating perceptions about resource development in the region. The United States as a whole (and Colorado in particular), are gaining a global reputation as being anti-development and anti-business. This reputation comes from endless efforts to create new regulations, protect more and more land, and companies constantly fighting lawsuits from wealthy environmental groups. Companies are deciding they would rather develop resources in other regions of the World, rather than fight the environmentalists and regulators in the United States. That has real-life socio-economic impacts. One only needs to look to Canada who has a more progressive natural resources policy to see that development and environmental protection can co-exist - and create a positive, growing economic environment and low unemployment.	All	Both	emc0054RM
26.	As a general and introductory comment, Garfield County (the County) agrees with and appreciates the desire by the BLM to ensure the continued persistence of greater sage-grouse and aid in the recovery of the species; however, the County cannot support the approach the BLM is suggesting in the GSGCM report, and further questions the purpose and need for another lengthy NEPA process, when there are already regulatory mechanisms and extensive sage-grouse protection and management plans in place for the appropriate management and assurances for persistence and recovery of the species. After reviewing the GSGCM report and supporting literature, we believe that the GSGCM report's recommended conservation measures exclude a balancing of resources and preempts existing permitted activities by state or local government(s), and would have significant undue hardships on private landowners and other key stakeholders including energy companies, which are vital for our local economies. While we understand the goals of protecting and restoring sage-grouse habitats, the Conservation Measures would be an extreme hardship on our constituents, and appears to exclude other viable alternatives to habitat management and goes beyond what the cited scientific literature has indicated as necessary for the continued existence of a health population of this species. Further, with existing NEPA requirements for any action on federal lands or for projects with a federal nexus, there are already guidance documents and required review by the US Fish and Wildlife Service, as well as Colorado Parks and Wildlife for projects which may impact sagegrouse. Introducing additional lengthy planning and uncertainty to our constituents at this time is unfair and will cause	All	BLM	emc0058RM

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	negative impacts to industry, our economies, and our ability to utilize the public and private resources within Garfield County and northwestern Colorado.			
27.	Range Management / Grazing Range Management or Grazing (domestic livestock and wild ungulate) is a very important component of Garfield County's traditional ranching heritage and wildlife herd management which requires working together with our public lands. In preparation of the EIS, Garfield County recommends the BLM work closely with the Cattleman's Association and the Wool Growers Association for both Colorado and other states which are also affected by the EIS to gain their valuable input into this process.	All	Both	emc0058RM
28.	Additionally, economic viability nationally such as pipelines, mining, commercial activity, renewable and other energy development, in these trying times, should take priority over sage grouse habitat to preserve the human species.	All	Both	emc005GB
29.	Judging by the habitat maps available at this time, multiple-uses of lands throughout the western United States will be affected by the proposed conservation measures. Our members currently have operations within the affected area, and future exploration and development of mineral resources, as well as the thousands of associated direct and indirect jobs, will undoubtedly be significantly impacted.	All	Both	emc0067GB
30.	Current and relevant socio-economic data regarding the community impacts near sage grouse habitat needs to be provided, preferably by a credible third party contractor, in the development of all alternatives considered in the EISs.	All	Both	emc0068RM
31.	In summary, CLUB 20 encourages careful consideration of: - Local community sage grouse planning efforts; - Broad and scientifically based management alternative considerations; - A fully developed social and economic impact analysis related to all communities that may be impacted; and - The development of an EIS that relies on local knowledge and adaptive management.	All	Both	emc0068RM
32.	The federal agencies must keep in mind that regulations designed solely to address the needs of a single species and not the habitat, could lead to the loss of the economic viability of the captive managers the agencies currently have on the public landscape. If lost, you will never get them back.	All	Both	emc0070GB
33.	Since passage of the National Environmental Policy Act (NEPA) of 1969, environmental impact assessments have become the key component of land use planning and decision making for public lands in the United States. Although agency planners and decision makers have recognized a need for better understanding the social consequences of projects, programs and policies, to our knowledge there has never been an EIS or EA prepared with an adequate analysis of the social impacts included. This is true even though an Inter-organizational Committee on Guidelines Principles for Social Impact Assessment (SIA) has existed for many years. Their purpose has been out-lining a set of guidelines and principles that could and should have assisted agencies and private interest in fulfilling their obligations under NEPA, related authorities and agency mandates. The Sage Grouse EIS should consider their process and set them as the basis to accomplish a true analysis of social AND economic impacts as one of the priority outcomes to be included in the EIS.	All	Both	emc0071GB
34.	Social impacts can be defined as the consequences to human populations of any public actions that alter the ways in which people live, work, play, relate to one another, organize to meet their needs and generally cope as members of society. Defining social impacts also includes cultural impacts involving changes to the norms, values, and beliefs that guide and rationalize their cognition of themselves and their society. The Sage Grouse EIS that is now seeking scoping comments should consider the social consequences or impacts that are likely to follow from any changes to policy actions (including	All	Both	emc0071GB

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	programs and the adoption of new polices), and specific government actions particularly in the context of the U.S. National Environmental Policy Act of 1969 or "NEPA" (P.L. 91-190, 42 U.S.C. 4371 et seq.). A central requirement of NEPA is that before any agency of the federal government may take "actions significantly affecting the quality of the human environment" that agency must first prepare an Environmental Impact Statement (or EIS). We believe that preparing this EIS or completing any of the unfinished various RMP's across the Sage Grouse range requires the integrated use of the social sciences.			
35.	In hindsight, it is most apparent that the impacts of the listing of the spotted owl as an endangered species and the subsequent EIS/EA's which have guided land use decisions had an incredibly detrimental impact on the social aspects of hundreds of rural communities. Little or no forethought regarding social impacts was put into that effort. A prime example is the community of Harney County. Land use decisions as a result of the spotted owl listing are the direct cause of federal actions guided by EIS's which conducted only a narrow analysis of the potential social impacts federal actions would cause. Our communities may not be able to remain in existence should this EIS not conduct a complete analysis of those social impacts. Obviously any alternative chosen to address those impacts must provide mitigation strategies or define ways that communities are part of the solution rather than ignored. In conclusion the position of the Harney County Court is that this EIS MUST be completed with a true analysis of Social impacts and it MUST address those impacts with the same level of sensitivity as environmental impacts are handled.	All	Both	emc0071GB
36.	Most EIS's to this date are focused on threats; will any opportunities or strengths regarding habitat or benefits of community to the habitat be analyzed? This is the basis for our county's request to look to the positive and may be a way to strengthen the social and economic connections to environment.	All	Both	emc0071GB
37.	How will the plan analyze social impacts from the changes to regulatory mechanisms and other areas included in the plan? How will these impacts be shown to be different than any economic impacts? Will the plan suggest ways to mitigate the social impacts for the affected communities? The Harney County Court realizes the difficulties of this but offers that any plan written without a complete determination of impacts to the social fabric of the community in and around sage-grouse habitat stands the chance of "undoing" extremely fragile islands of humanity, our community. The Court will do everything in its power to assist in this analysis but strongly urge an early focus in the EIS process on this issue. (NOTE: as described earlier if the analysis includes strengths and opportunities rather than just threats it would add significantly to ties with local communities!)	All	Both	emc0071GB
38.	How will the plan analyze economic impacts from the regulatory mechanisms included in the plan? Will the plan suggest ways to mitigate the economic impacts for the affects communities?	All	Both	emc0071GB
39.	In many cases grazing permitee's Taylor Grazing dollars or other non-federal funds have paid for range improvements. What analysis will be included in the EIS to assure the continued availability of these funds are not prohibited or reduced by the outcome of the EIS?	All	Both	emc0071GB
40.	A possible new strategy to include for analysis might be to do a complete review of the positive impacts that ranching, grazing, Taylor Grazing projects, Boy Scout projects and etc. have on the ground to the benefit of Sage Grouse habitat and include them in the EIS. This may provide the opportunity to expand on this type of project in any alternative at the end of this work.	All	Both	emc0071GB

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41.	Please be very careful of adding unnecessary restrictions that are costly to both the government and those of us what have to make a living here.	All	Both	emc0082GB
42.	Mining and livestock grazing contribute substantially to local communities in northern Neveda and throughout the western United States. Newmont supports the BLM's efforts to take measures that will avoid the potential listing of Greater sage-grouse under the Endangered Species Act; however, it is essential that the BLM carefully considers the impacts of potential conservation measures on mining and grazing activities, and that BLM develops a balanced approach that will avoid or minimize the socio-economic effects such measures will have on local communities and business interests.	All	Both	emc0084GB
43.	11th and 12th bullets: In considering the economic situation- tracking alternative scenarios- to maintain healthy ecosystems, the economic value of wildlife populations must also be considered. Such values include wildlife viewing, hunting, and more.	All	Both	emc0099GB
44.	A full analysis of the socio-economic impacts of conservation measures need to be considered in the EIS for all alternatives. The analysis of socio-economic impacts must include a detailed analysis of the cumulative impacts of conservation measures.	All	Both	emc0103GB
45.	We are a hard rock mining company with patented mineral reserves on private land and mining claims on public lands within the state of Nevada and as such are a stakeholder in this process. We are concerned about the fate of the regulatory framework associated with sage-grouse habitat conservation and its effect on mining and exploration and the associated economic impact to the state of Nevada.	All	Both	emc0103GB
46.	The land management agencies must cooperate with State and local governments and coordinate with existing local plans. Livestock producers' ability to graze livestock on BLM and FS managed lands is critical to many of Wyoming's counties and rural economies. Local and county governments should play an active role in land use planning	All	Both	emc0106RM
47.	It is extremely important that a stable economic environment be sustained and enhanced so that our members may assist in the conservation of rangeland for the greater sagegrouse. We appreciate the opportunity to comment on the NOI regarding development of EISs and SEISs for management of the greater sage-grouse and its habitat	All	Both	emc0106RM
48.	Furthermore, the Act stipulates "… when an EIS is prepared "and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment" (40 CFR 1508.14). The EIS's are thus intended to provide a kind of fulldisclosure procedure for federal decision-makers, who are then expected to consider the negative as well as the positive implications of potential courses of action, and the unintended as well as the intended consequences, before they proceed. b. Therefore any alternative that significantly reduces grazing in the Custer Lemhi County area will have a dramatic soci-economic impact affecting the economy and cultural way of life, thus the most important alternative should be the consolidation of adjoining allotments into grazing associations.	All	Both	emc0112GB
49.	The BLM must analyze the potential economic impacts that additional restrictions on oil and gas operations and other uses of the public lands will have upon local and regional economics. Such an analysis must be prepared on a local, planning level, not a single national or regional analysis. Only site-specific economic impact analysis will demonstrate the potential economic consequences of additional restrictions to public lands users and local governments. Such an economic analysis is specifically required by the BLM Land Use Planning Handbook. BLM Manual H-1601-1, Land Use Planning Handbook,	All	BLM	emc0116GB

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	Appendix D (Rel. 1- 1693 03/11/05).			
50.	Address the full economic impacts to existing and future mineral development of fee surface and mineral estates. In areas of mixed land ownership patterns, application ofBLM's rule-of-reason may have significant impact on timely and efficient development of those resources. Briefly, the rule-of-reason states that "BLM will limit its responsibility for ... protection of (plant and wildlife) on lands outside the administrative jurisdiction of the Bureau, according to the degree to which Bureau decisions condition or control the location of surface disturbing activities on those lands" (BLM I.M. 99-24). Under the rule-of-reason, damages to fee mineral interests could occur where BLM management decisions preclude reasonable access or limit facility siting opportunities.	All	Both	emc0125RM
51.	It also needs to be noted that we the stewards/owners of the lands need to have some consideration. If we cannot continue to make a living from the land, we won't have to worry about conserving animals anymore; we'll need to worry about surviving ourselves. We need to use good common sense in the management of the land and the animals. We have to stop the attitude that we can't save every animal, or perhaps every species.	All	Both	emc0128GB
52.	All federal decisions should be directly addressed substantively in writing by the lead agency and based on scientific peer-reviewed data. Every EIS and SEIS should be accompanied by a complete economic analysis and an analysis of the impacts of all proposed alternatives on other multiple uses within the planning area, so as to avoid unnecessary and unreasonable socio-economic impacts.	All	Both	emc0140RM
53.	Specifically, wherever grazing allotments exist, analyses must address the positive impacts of livestock grazing to greater sage-grouse habitat, as well as the potential loss of those benefits, should grazing be reduced or eliminated. One major loss should public lands grazing be curtailed, for example, would be the open space provided by private ranch lands, which is critical to greater sage-grouse habitat. Every federal grazing allotment in the West is held by a rancher who owns accompanying private “base” property. In fact, these ranchers own nearly120 million acres of primarily rangeland. Most of these ranchers’ ability to stay in business is dependent on their ability to continue grazing public lands. The unintended consequences of decisions that negatively impact those ranchers will also impact the greater sage-grouse, by encouraging the conversion of private rangelands into farmland, urban development, or other uses not conducive to greater sage-grouse habitat. As indicated by the Sage Grouse Initiative (SGI), this fact has been recognized by NRCS; fortunately, the agency has indicated its commitment to its relationship with the ranchers that make greater sage-grouse conservation possible.	All	Both	emc0140RM
54.	Alternatives The NOI states: “The BLM and FS will address socio-economic impacts of the alternatives. Socioeconomic analysis will use an accepted input-output quantitative model such as IMPLAN or RIMSII, and/or JEDI for renewable energy analysis.” This includes any direct or indirect economic impact on rural economies due to negative impacts on grazing. We agree that BLM should consider not only the environmental consequences in the NEPA analysis, but also the impacts to the human environment and economy, including grazing, mining, oil and gas, and other multiple-use industries. We strongly encourage the agencies to consult economists from Western Land Grant universities when developing the models (variables, assumptions, data) for use in the abovementioned programs.	All	Both	emc0140RM
55.	It is imperative that a stable economic environment be sustained and enhanced so that our members may assist in the	All	Both	emc0140RM

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	conservation of rangeland for the greater sage-grouse.			
56.	And what is to become of cattle ranchers and their cattle if you kick them off their grazing lands? It will disrupt the economic progress and put many ranchers out of business.	All	Both	emc0141GB
57.	All Draft Environmental Impact Statements the BLM has issued or will issue/approve included biological surveys that would have identified impacted sage grouse habitats and populations, and should have taken into account impacts on sage grouse and applied necessary mitigation measures. Requiring after-the-fact implementation of additional policies and procedures can have significant monetary and timeline impacts to projects (e.g. mining, grazing, etc.), potentially making them economically infeasible. This could cause current proponents and lease holders to lose funding sources and/or incur economic costs which could result in the loss or withdrawal of the application, and have a significant socio-economic impact on surrounding communities.	All	Both	emc0147GB
58.	Garkane Energy Cooperative provides electric power to the communities and facilities within south central Utah and northem Arizona and the decisions made as part of this planning strategy will directly affect our ability to provide reliable power at reasonable rates to our service area.	All	Both	emc0150GB
59.	The BLM must analyze the potential impacts that additional restrictions on oil and gas operations, and other uses of the public lands, will have upon local and regional economics. Such an analysis must be prepared on a local, planning level, not a single national or regional level. Only with site-specific economic impact analysis will public lands users and local governments understand the potential economic consequences of additional restrictions. Such an economic analysis is specifically required by the BLM Planning Regulations and the BLM Land Use Planning Handbook. 43 C.P.R. §§ 1610.4-4(g), 1610.4-6; BLM Manual H-1601-1, Land Use Planning Handbook, Appendix D (Rel. 1-1693 03/11/05).	All	BLM	emc0166GB
60.	The BLM has historically been very successful in developing strategies to mitigate the environmental effects of mining and mineral exploration while simultaneously facilitating a productive industry in accordance with multiple-use policies. Wholesale withdrawal oflarge areas of Nevada to mining and mineral exploration, an industry which is vital to the local and national economies, is an extraordinarily unimaginative and uncreative approach to addressing the impacts of this activity on sage grouse habitat.	All	Both	emc0168GB
61.	Some manageable issues, ideas and options that should be addressed in and EIS can be broken down into the following principal points. 4. Economic	All	Both	emc0200GB
62.	The economic aspect related to any proposed action relating to sage grouse must be carefully taken into account and goes far beyond the cost of administration. Proposals have been tabled by some parties to severely limit or eliminate commercial grazing. This would have a devastating effect on many western cattle ranching and an equally devastating effect on rural communities and counties.	All	Both	emc0200GB
63.	Hunting for sage grouse is a very significant draw for many rural areas during the hunting season. Closing the hunting season as some would propose, would significantly reduce the number of hotel rooms rented the number of meals purchased, the local supplies purchased and severly damage rural economies. Closing the hunting season would also suggest that sage grouse would not be elligible for as much support from hunting licenses as huntable game species. This would have the potential unintended effect of increasing illegal hunting though reduced law enforcement and monitoring.	All	Both	emc0200GB

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64.	The conservation of rangelands for livestock production is extremely important, not only to the sustainable production of food and fiber for the United States and worldwide markets, but also to providing quality habitat to support wildlife populations.	All	Both	emc0202GB
65.	I am extremely concerned about the impact that the above referenced notice of intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities.	All	Both	emc0215GB
66.	While the team members appear to have expertise in sage-grouse habitat, there seems to be little expertise in oil and gas exploration, development and operation practices. Prior to implementing additional conditions and stipulations BLM should engage in good faith discussion with industry representatives on such measures. BLM's analysis should also include the economic effect of any new stipulations as they will limit access to precious oil and gas reserves	All	Both	emc0228GB
67.	In rural counties of the Western United States, the effect of a no-grazing alternative would be devastating to the local customs/culture/economics with a great multiplying effect.	All	Both	emc0233GB
68.	Characteristics of wilderness-quality lands such as naturalness, roadlessness, and primitive settings are also valuable characteristics of important sage-grouse habitat. Protecting lands with wilderness characteristics can support the principles for protecting and managing sage-grouse habitat as outlined in BLM's National Strategy and reiterated in IM 2012-043, namely protecting unfragmented habitats and minimizing habitat loss and fragmentation	All	Both	emc0234GB
69.	Page 12, Lands/Realty section indicates that rights-of-way (ROWs) should not be permitted in high priority sage-grouse habitats, with a few exceptions. The socio-economic impact of this conservation measure needs to be analyzed in the EIS. Restricting the new ROWs to be co-located entirely within an existing ROW is too restrictive (page 13, first bullet). The temporary, short-term use of a laydown yard or staging areas that is too large to be co-located entirely within an existing ROW should not be sufficient reason for denying the use of the ROW. However, such short-term temporary use should be followed by reclamation to prevent non-native invasive species from establishing and re-establishing perennial vegetation.	All	Both	emc0239GB
70.	On page 14, Proposed Land Withdrawals section, the first conservation measure bullet proposes that "lands within priority sage-grouse habitat areas for mineral withdrawal." The socio-economic impacts of this conservation measure need to be evaluated in this EIS.	All	Both	emc0239GB
71.	The socio-economic impacts of the three conservation measures at the top of page 15 need to be analyzed in the EIS. These measures are examples of single-species management and deviate from the multiple-use principles that BLM is required to follow.	All	Both	emc0239GB
72.	On page 17, Retirement of Grazing Privileges, the planning note at the bottom of the page indicates that BLM and USFS will target specific allotments for permanent retirement of grazing privileges. The authority for this use of BLM and USFS action needs to be identified in the EIS and the socio-economic impacts of this type of action need to be analyzed in the EIS.	All	Both	emc0239GB
73.	The socio-economic impacts of the minerals-related conservation measures need to be analyzed in the EIS. The restrictive nature of the conservation measures does not allow for mitigation to offset impacts created by mineral exploration and development. The NOGA believes that the best way to provide for protection of the sage-grouse, while simultaneously allowing continued economic development, is for BLM to develop conservation measures in cooperation with the	All	Both	emc0239GB

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	regulated community that include a strong but pragmatic mitigation program.			
74.	The BLM must ensure that that sage grouse conservation measures can be enacted in a manner that will not adversely impact local and state economies. The state and counties will not accept over-reaching conservation measures, such as were enacted in the Pacific Northwest for the Northern Spotted Owl, which devastated the timber industry, led to numerous mill closures and resulted in the loss of countless jobs and economic activity that timber towns have yet to fully recover from. The EIS must include a sufficient socio-economic impact analysis and a cost-benefit analysis that can help decision makers determine whether the benefits of conserving sage grouse habitat outweigh the socio-economic costs of doing so.	All	Both	emc0242GB
75.	The BLM must consider the impact of sage grouse conservation measures on local and state tax and royalty receipts.	All	Both	emc0242GB
76.	Cattle ranching is a mainstay of Nevada (the state most heavily impacted by the threatened sage grouse), and the livelihoods of thousands of American citizens could be extinct due to the restrictions placed on ranchers by the Interim Policy.	All	Both	emc0244GB
77.	The requirements that could ultimately be Incorporated In the RMPs will undoubtedly Impact future development and corresponding socio-economic benefits across the range of the GSG. As part of the RMP amendment process, BLM should address the soclCH!COnomlc Impacts of applying more restrictive sage grouse management requirements, factOring in the projected reduced level of activity Inside PPH areas. ' Specifically, BLM must analyze the potential economic Impacts that additional restrictions on 011 and gas operations, and other uses of the public lands, such as grazing and recreation actMties, will have upon local and regional economics. This analysiS should focus on local, regional, and national Impacts. An adequate soclo-economlc analysis will Inform state and local stakeholders of the economic effects of additional restrictions for GSG and Is necessary for BLM to adequately assess which management strategy is the most viable to protect the species while allowing for continued multiple use of the public lands.	All	BLM	emc0246GB
78.	The oil and gas industry contributes significantly to the local, state, and national economy, providing billions of dollars each year in royalties, bonuses, and severance taxes, besides other benefits of direct capital investment to local economies and high paying Jobs. Accordingly, BLM needs to analyze the effect on the local, state and national governments from the loss revenue that will arise from the Implementation of the new sage-grouse policies. The analysis should also include but not be limited to the loss of jobs and the increase of unemployment compensation.	All	BLM	emc0246GB
79.	To threaten thousands of jobs and families (that produce food and fiber for our country) throughout eleven western states is, to me, almost criminal.	All	Both	emc0249GB
80.	Please include an economic analysis of each regulatory option that is being considered. The impacts should be specific to every economic area impacted by the proposed action. In other words, if a proposed restrictive rule would prohibit grazing, logging, mining or recreational activity, how much damage would that do to the local economy.	All	Both	emc0260GB
81.	The proposed remedies for the birds' recovery are aimed straight at the heart of our County's economic stability. Converse County depends heavily on our coal mines, oil and gas wells, and wind farms, along with their various transmission lines, haul roads, and pipelines for our diversified economy. Our ranchers depend on the allotment of the BLM and USFS lands to graze their livestock. All of these activities sustain our County with good paying jobs and a myriad	All	Both	emc0266GB

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	of tax benefits. These endeavors can work in consort with the sage grouse if we are careful. If you chose to close these and all other human activity in the core areas, how are we to pay for your recovery actions?			
82.	In the rare event that a mine is created the wealth contributed to the state and federal governments is large. The suggested removal of vast acreages would have a highly material impact on the potential future tax base.	All	Both	emc0272GB
83.	The comments presented here are aimed at conserving the Greater Sage-Grouse (sage-grouse) while allowing El Paso's and others' necessary natural gas development projects to be permitted and implemented in an efficient and cost-effective manner.	All	Both	emc0278GB
84.	Construction and permitting delays can be cost ly to El I>aso and its customers. Beyond economic costs, such delays underm ine the ind ustry's abi lity to provide safe, secure and rel iable energy supplies needed to support economic growth while protect ing both human health and environmental concerns. As wi th other regulatory approval processes, compliance with the BLM Resource Management Pl ans is a key factor in accomplishing effic ient perm itting and implementation of natural gas projects.	All	Both	emc0278GB
85.	In addition to adhering to its long-standing multiple-use policy, the BLM must also analyze the economic impacts of the restriction of energy development and infrastructure as wel l as traditional uses such as grazing through the implementation of sage-grouse conservation measures. Many local and regional economics are dependent upon the multiple Ilses of the public lands and as such deserve a comprehensive economic evaluation of the economic impact of any large-scale, range-wide conservation measures.	All	Both	emc0278GB
86.	The BLM allotments and associated private lands in sagebrush country provide habitat for diverse wildlife species as well as providing the economic base for these rural counties.	All	Both	emc0281GB
87.	However, as described above, fences can provide time-control, and proper grazing can significantly improve rangeland function and GSG habitat, improving vital rates and increasing populations. If used properly, fence benefits to rangeland function outweigh the negative effects. Large herds and large pastures are preferential than small herds and small pastures from and economic and ecological perspective	All	Both	emc0281GB
88.	BLM should consider not only the environmental consequences in the NEPA analysis, but also the impacts to the human environment and economy, including grazing, mining, oil and gas and other multiple-use industries.	All	Both	emc0284GB
89.	Every EIS and SEIS should be accompanied by a complete economic analysis and an analysis of the impacts of all proposed alternatives on other multiple uses within the planning area, so as to avoid unnecessary and unreasonable socio-economic impacts.	All	Both	emc0284GB
90.	If grazing permits are reduced as a result of this effort, the negative economic impact to rural communities would be significant and it is important that the EISs and SEISs acknowledge this.	All	Both	emc0284GB
91.	Suggest that –Page 22 Fluid Minerals and Solid Minerals sections. The language in the entire area of both of these sections should be edited to reflect the attitude of possible cooperative efforts to manage sage-grouse habitat and develop the energy types located in these areas. Removing energy exploration and development completely from these areas will have a severe impact on our local economy and also impact other areas of the country where habitat may be fragile but not regulated because of its effect on plant or animal species. This common sense approach would help our federal government continue to provide affordable energy to it's people.	All	Both	emc0291GB, emc0055RM, emc0119RM

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92.	The economic impacts of a possible listing would be devastating to the west. Those groups pushing for a listing are only interested in removing cattle from the range and are willing to destroy an industry to meet their goals. Science will not support that agenda.	All	Both	emc0292GB
93.	The second major point is that unnecessary sage-grouse conservation measures that have and will negatively impact all economic activities across the species entire range. Increasing the regulatory cost and burden to conduct natural resource related activities and significantly reducing or virtually eliminating such activities.	All	Both	emc0294GB emc0120rm
94.	Secondly: Because the listing is not warranted by terms of the Endangered Species Act itself then the Proposed Interim Managment proposes unnecessary sage-grouse conservation measures that have and will negatively impact all economic activities across the species entire range, increasing the regulatory cost and burden to conduct natural resource related activities and significantly reducing or virtually eliminating such activities. History has shown that many of the management tools being used over the past 30 years are not improving but rather diminishing wildlife habitat. Two examples are reduced stocking levels which has lead to heavy fuel loads causing more large fires and the fire managment policy of pulling off fires at night which has cause hundreds of thousands of acres to be burned unnecessarily. I personally saw where the Windemere Hills fire North of Wells could have been put out the first night if they would have stayed on it but instead it was allowed to burn over 80,000 acres in the end. When the government fire fighters went off the fire in the evenings two cowboys who were running cattle in a private pasture I leased road their motorcycles with shovels over their sholders and they almost had it put out that night but didn't. The fire crews had a fire meeting at 7 am and by the time it was done and they were back on the fire the wind was comming up and it was starting to roar again. Another managment practice that has negatively impacted Sage Grouse is fencing of riparian areas without grazing as part of the annual managment. These riparian areas were historically used by Sage Grouse when cattle had grazed them down and the feed was more succulent and the cow feces was creating a natural fertilizer and medium for bugs and worms. The stringer meadow with long edge lines were a perfect Sage Grouse feeding trough as long as it were grazed . If grazing of the riparian areas is used as a tool to keep the course grass and brush down so the feed is desirable Sage Grouse will start using these enclosures again unless they are heavily treed. Even if the Sage Grouse don't use them if they are treed other wildlife will use them more. As the cattle leave it the Fall have them use the Riparian areas before they go.	All	Both	emc0299GB
95.	The EIS must include an extensive and detailed socioeconomic evaluation of each proposed alternative in terms of direct, indirect and cumulative social and economic impacts to individuals, industrial sectors, state and local governments and the public who use, may use or rely on public lands. The range of alternatives must be technically and economically feasible, and the scope of the socioeconomic cumulative effects analysis must be sufficiently robust to quantify the potential impact on the economic viability of communities in the sub-region (eg: loss of wages, business, sales, and employment taxes, mining proceeds payments, transportation of goods and services, lost jobs in other parts of the US that provide goods and services to the industry, raising the tax burden on other residents, decline in public services funded by these tax revenues, etc.).	All	Both	emc0310GB
96.	The EIS must specifically identify what economic indicators and thresholds will be used when comparing the impacts of sage grouse habitat protection measures verses the socioeconomic costs to business, industry, governments and the public.	All	Both	emc0310GB

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97.	The requirements that could ultimately be incorporated in the RMPs will undoubtedly impact future development and corresponding socio-economic benefits across the range. In the GSG Amendment process, BLM should address the socioeconomic impacts of applying more restrictive sage grouse management requirements, factoring in the projected reduced level of activity inside PPH areas. Specifically, BLM must analyze the potential economic impacts that additional restrictions on oil and gas operations, and other uses of the public lands, such as grazing and recreation activities, will have upon local, regional, and national economics. An adequate socio-economic analysis will inform local stakeholders of the economic effects of additional restrictions for GSG and is necessary for BLM to adequately assess which management strategy is the most viable.	All	BLM	emc0312GB
98.	The AMA advocates responsible motorized recreation on public lands for its members in the western part of the United States. On behalf of our membership we want to see our members and their friends and families continue to enjoy the American outdoors. Motorized recreation has a substantial growing economic impact on many small communities in the West. We feel it is important that the management of sage grouse be adequately defined so that we avoid unnecessary restrictions being placed on America's motorized outdoor recreation causing an adverse economic impact on the small business sector of rural communities.	All	BLM	emc0313GB
99.	Any EIS or SEIS must also explicitly recognize the following points: In the Great Basin, and much ofthe western United States, livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire rural communities that largely depend on ranching to maintain businesses and tax base.	All	Both	emc0315GB
100.	Our organization is concerned that the protection measures and restrictions included in the Interim Guidance IM and the National Technical Team's Report on National Greater Sage-Grouse Conservation Measures (the "Report") are excessively restrictive for a species that is not currently listed as threatened or endangered under the ESA, and we are deeply concerned about the economic impact of implementing such a plan will have on our region, particularly as we attempt to recover from a long-term recession	All	Both	emc0319GB
101.	We request that socio-economic impacts of applying more restrictive GSG management requirements be addressed in the study. As an organization of primarily small businesses we think this is imperative. Specifically, BLM must analyze the potential economic impacts that additional restrictions on oil and gas operations, and other uses of the public lands, such as grazing and recreation activities, will have upon our local and regional economics.	All	Both	emc0319GB
102.	The first thing I would like you to consider is this: With the National debt going up at the rate of a million dollars approximately every 30 to 3S seconds (as of yesterday), who is going to pay for your plan of operation? All of us are taxed to where it is becoming more and more difficult to make a living or even maintain.	All	Both	emc0320GB
103.	To shut down the natural raw industries, whether it be mining, subsurface extraction of either oil & gas or geothermal, surface use of ranching and farming, seems to me that you are cutting future revenue for your own existence as an agency to manage the Public Lands as well as that of the State of Nevada, along with the other Western States for generations to come.	All	Both	emc0320GB
104.	We also have concerns about the impact of the proposed conservation measures on our members with mineral resources or projects on private lands. BLM's materials state the conservation measures would be applied regardless of surface	All	Both	emc0321GB

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	ownership (emphasis added). For example, see the 12/27/11 press release: human-caused disturbance in priority habitat would be limited to less than 2.5% of the species' total habitat, regardless of surface ownership. It is essential BLM and USFS carefully consider the impacts of potential conservation measures on mining and grazing activities, and that both agencies develop a balanced approach that will avoid or minimize the socio-economic effects such measures will have on mining, grazing, other multiple-use activities and local communities.			
105.	There are a number of current federal, state, and local management and conservation measures to improve and protect sage-grouse habitat. Many of these have been in effect for a decade or more. The ongoing implementation of these measures should be evaluated in the No Action Alternative to provide the baseline against which all other alternatives are compared and measured. The EIS documents prepared for each sub-region must include a substantive and detailed analysis of the Continuation of Existing Conservation Measures/No Action Alternative. Specifically, this analysis should examine, in addition to complete or better implementation of Manual 6840, the following potential outcomes that would result from the Continuation of Existing Conservation Measures/No Action Alternative: ☐ Assess the economic benefits that would likely occur if the current Land Use Plans (LUP's) remain in effect allowing future mineral exploration and development, oil and gas exploration and development, rights-of-way (ROW) development, grazing, and other multiple-uses of public lands with sage-grouse habitat compared to the economic hardships that would likely occur as a result of implementing the land use restrictions and prohibitions recommended in the December 2011 NTT Report.	All	Both	emc0321GB
106.	Page 12, Lands/Realty section indicates that rights-of-way (ROWs) should not be permitted in high priority sage-grouse habitat, with a few exceptions. The socio-economic impact of this conservation measure needs to be analyzed in the EIS. Restricting the new ROWs to be co-located entirely within an existing ROW is too restrictive (page 13, first bullet). The temporary, short-term use of a laydown yard or staging area that is too large to be co-located entirely within an existing ROW should not be sufficient reason for denying the use of the ROW. However, such short-term temporary use should be followed by reclamation to prevent non-native invasive species from establishing and re-establishing perennial vegetation.	All	Both	emc0322GB
107.	On page 14, Proposed Land Withdrawals section, the first conservation measure bullet proposes that "lands within priority sage-grouse habitat areas for mineral withdrawal." The socio-economic impacts of this conservation measure need to be evaluated in the EIS.	All	Both	emc0322GB
108.	The socio-economic impacts of the three conservation measures at the top of page 15 need to be analyzed in the EIS. These measures are examples of single-species management and deviate from the multiple-use principles that BLM is required to follow.	All	Both	emc0322GB
109.	The section on Treatments to Increase Forage for Livestock/Wild Ungulates, page 16 is very single-species oriented and does not uphold the principles of multiple-use management. The socio-economic impacts of these conservation measures should be analyzed in the EIS.	All	Both	emc0322GB
110.	On page 17, Retirement of Grazing Privileges, the planning note at the bottom of the page indicates that BLM and USFS will target specific allotments for permanent retirement of grazing privileges. The authority for this use of BLM and USFS action needs to be identified in the EIS and the socio-economic impacts of this type of action need to be analyzed in the EIS.	All	Both	emc0322GB

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111.	The socio-economic impacts of the minerals-related conservation measures need to be analyzed in the EIS. The restrictive nature of the conservation measures does not allow for mitigation to offset impacts created by mineral exploration and development. I believe that the best way to provide for protection of the sage-grouse, while simultaneously allowing continued economic development, is for BLM to develop conservation measures in cooperation with the regulated community that include a strong but pragmatic mitigation program.	All	Both	emc0322GB
112.	In closing, I support the concept of enhancing sage-grouse populations and habitat. But the conservation measures in the NTT report create real concerns that socio-economic and ecological impacts will occur by implementing these conservation measures, but very few gains in sage-grouse populations or habitat will be realized by implementing these conservation measures.	All	Both	emc0322GB
113.	Also, the proposal should allow flexibility for the agencies to develop conservation measures in cooperation with the regulated community that include a strong but pragmatic mitigation program while simultaneously allowing continued economic development.	All	Both	emc0322GB
114.	Our family business is in the cattle business and our community and many local businesses are dependent upon livestock grazing on public lands - arbitrary changes to land-use plans could seriously damage our local economy, private businesses and sagegrouse populations in our area. The assumption of many managers inside and outside BLM and other agencies is that because of the proposed listing of sage-grouse, that something different in land use or management needs to be done when the opposite should be the starting point for sage-grouse conservation measures and they need to be site specific.	All	Both	emc0323GB
115.	The proposed land use restrictions and proposed withdrawal of lands from mineral entry for areas with high-priority sage-grouse habitat will substantially hann NVMRA members that have exploration projects in these areas. However, beyond the immediate impact the proposed land use restrictions, prohibitions, and withdrawals will have on NVMRA member companies, we are concerned that a significant reduction in the amount of land open to operation of the U.S. Mining Law will hurt Nevada's economy - especially in rural Nevada. Such a withdrawal will also hann the nation at large because it will increase the country's reliance on foreign sources of minerals that support the U.S. economy, are needed to build our infrastructure, and are critical to our national defense.	All	Both	emc0327GB
116.	As BLM moves forward with the EIS, BLM should strive to avoid or minimize disruption of mineral development as minerals are the building blocks of our society, playing a vital role in innovation, national security and economic growth. And abundant and affordable coal is the backbone of our nation's power, supplying nearly half of the nation's electricity. The 1.8 million jobs supported by U.S. mining generate billions of dollars in economic activity. According to government statistics, the value added from industries consuming the $64 billion in raw materials from U.S. minerals mining translates into $2.1 trillion, or 14 percent, of our GOP, and approximately $100 billion in coal-based electricity generation. BLM must ensure that the nation's need for minerals and affordable energy is properly reflected in the EIS. While economic factors cannot be considered by the Fish and Wildlife Service when making a determination whether to list a species, the same is not true of BLM in its efforts to design measures to preclude a listing. NMA believes that BLM can and should adopt a balanced approach to sage grouse conservation that recognizes the agency's multiple use mandate while also being designed to avoid or minimize adverse socio-economic impacts. Specific issues that BLM should consider in the EIS to ensure a balanced approach are outlined below.	All	Both	emc0331GB

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117.	Continuation of Existing Management and Conservation Measures - (The No Action Alternative) - Must Be Thoroughly Evaluated The continuation of existing management and conservation measures and existing regulatory policies including the directives in BLM Manual 6840 define the No Action Alternative. As is the case for all NEPA documents, the No Action Alternative provides the baseline against which all other alternatives must be compared and measured. The No Action Alternative analysis in each sub-regional EIS should quantify the impacts associated with ongoing implementation of the many existing local, state, and federal conservation measures and the existing BLM and USFS policies to protect sage-grouse habitat. Some of the impacts that could result from continuation of the existing regulatory framework and conservation measures that should be evaluated in the EIS documents include the following: The economic benefits to States and local governments that would likely occur if the current Land Use Plans remain in effect allowing future mineral exploration and development, oil and gas exploration and development, rights-of-way ("ROW") development, grazing, and other multiple uses of public lands with sage grouse habitat rather than implementing the land use restrictions and prohibitions recommended in the December 2011 NTT Report.	All	Both	emc0335GB
118.	Eureka Moly Scoping Issue No.4: Thoroughly Evaluate the No Action Alternative -The EIS documents must include a detailed discussion of the habitat conservation improvements currently being achieved under the existing policies, the socioeconomic benefits that would result from continued private-sector authorized uses of public lands with sage-grouse habitat, and the possibility that in light of the numerous habitat conservation measures already in place, the USFWS will detennine that the sage-grouse should maintain its status as a Warranted but Precluded, candidate species.	All	Both	emc0335GB
119.	Simply because these analyses will focus upon protection of Sage-grouse does not lessen the importance of a sound, comprehensive economic impact analysis. The BLM must analyze the potential economic impacts that additional restrictions on oil and gas operations, and other uses of the public lands, such as grazing and recreation activities, will have upon local and regional economics. Such an analysis must be prepared on a local, planning level, rather than focusing on a single national or regional analysis. Only with site-specific economic impact analysis will BLM have the tools to adequately assess which management strategy is most viable and it will allow public lands users and local and state governments understand the potential economic consequences of additional restrictions.	All	BLM	emc0340GB
120.	Although the request for scoping comments notes that socio-economic considerations will be included in the EIS process, such considerations must be made on a local basis considering the local economic impacts of any proposed action. WACD objects to any social or economic analysis that reviews impacts on a national or state-wide scale. The management oflocal BLM and Forest Service lands will have immediate fiscal and community (social) impacts in local areas, and those local area impacts must be fairly and equally considered, and not skewed by comparing local impacts to a national scale. Additionally, while the courts have recognized that a modeling process like IMPLAN may be used, it is important to ground-truth any data being fed into the model. The quality ofthe data used within the model will impact the quality of the result. Thus any data being fed into any model must comply with the requirements of the Data Quality Act.	All	Both	emc0342GB
121.	• The scale of the core area protection approach and its blanket exclusion of wind development compromises state and Federal renewable energy and economic development objectives.	All	Both	emc0344GB
122.	F. EIS's Socioeconomic Impacts Analysis NEPA implementing regulations state that "[w]hen an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the	All	Both	emc0344GB

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	environmental impact statement will discuss all of these effects on the human environment."144 More specifically, the incremental socioeconomic impacts of the proposed action and each alternative should be evaluated in the cumulative effects section of the EIS.145 Therefore, the EIS should address the local, regional, and national socioeconomic effects related to wind energy on: 1) Employment; 2) Economic Development; and 3) Taxable Income. Based on our calculation, 6,814 MW of wind energy development, representing over $13 billion in investment, would be put in jeopardy if the sage-grouse policy continues as it stands today. Such information should be fully developed and considered by BLM and FS in making their land management decisions.			
123.	F. The Scale of the Core Area Protection Approach and its Blanket Exclusion of Wind Development Compromises State and Federal Renewable Energy and Economic Development Objectives The sage-grouse conservation documents that the NOI states will inform the RMP amendment process adopt an approach whereby important environments for sage-grouse preservation are identified and subsequently established as core areas in which development activities are prohibited. For example, there is a blanket prohibition on wind energy development in PPH areas in which a 3 percent disturbance threshold has already been met.196 Another related core area protection measure requires that PPH areas be managed or restored so that at least 70 percent of the land cover provides sagebrush habitat for the sage-grouse.197 Given that the sage-grouse occupies an expansive range across the western United States, much of which overlaps with the nation's regions that possess the greatest potential for wind energy development, such a rigid conservation framework has the potential to bring wind energy development on public lands to a halt. AWEA has analyzed the PPH and PGH sage-grouse areas designated within different states and how they overlap witheach state's capacity for wind development. According to our analysis, restricting development in the designated areas would result in the loss of 82.2 percent of all lands suitable for wind development in Wyoming, 55 percent for Nevada, 53 percent for Montana, 52.1 percent for Idaho, 38.4 percent for Oregon, and 9 percent for Utah.198 Considering the magnitude of these percentages, adopting a core area approach premised on blanket wind development exclusions would significantly derail the nation's energy, environmental, and job creation objectives associated with renewable energy, and prioritized by the Obama Administration.	All	BLM	emc0344GB
124.	The BLM may want to consider a "balance of harms approach" to minimize negative consequences of conservation measures to local communities. This is particularly important in cases where there is scientific uncertainty about the information being used in decision-making. For example, in the precedent setting case on delta smelt, Judge Wanger (2010) wrote, "Congress has not nor does TVA v. Hill elevate species protection over the health and safety of humans and Judicial deference is not owed to arbitrary, capricious, and scientifically unreasonable agency action." That decision effectively imposed limits on how far an agency could go in protecting species at the expense of local communities.	All	BLM	emc0346GB
125.	Two narrow alternatives are presented, Alternative A: closing priority sage grouse habitat areas to fluid mineral leasing, and Alternative B: allowing leasing when there is checkerboard ownership and a mitigation plan developed that will bring long-term population increases. Alternative B, does not acknowledge that it may not be possible to meet the condition that the sage grouse population in the proposed lease area be increased through mitigation above its current number (i.e. because it is already high, prior to leasing). A more reasonable set of alternatives would include a range of population level responses that take into account natural population fluctuations (e.g. an expected percentage of change over current	All	BLM	emc0346GB

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	number over the life of the field). Also, alternatives are needed that address not only population and habitat variables but also the socioeconomic impacts associated with reduced oil and natural gas production from the federal mineral estate.			
126.	2. Role of Soils in Potential Sage Brush Habitat The NOI and the Technical Team Report omit entirely the variation of soils and relation of soils to sage brush habitat. By way of example, much of southwestern Wyoming has alkaline or sodic soils, which will not support sage brush. This and other limitations will apply throughout the Rocky Mountain and western rangelands. No EIS should be written without a Level III analysis of the soils.	All	Both	emc0371GB
127.	Listing the sage grouse on the endangered species list, or enacting inhibitive rules upon western range lands will be extremely detrimental to my family's livelihood and our way of life. Though I was raised on a ranch in northern Nevada, I recently returned to the area with my husband and two year-old daughter, after purchased a ranch last year. The ranch, like most in the area, is dependent upon public range land for cattle grazing. Without grazing access on rangelands, our newly purchased ranch is no longer a viable business.	All	Both	emc0372GB
128.	The BLM must consider the impact of sage-grouse conservation measures on local and state tax and royalty receipts	All	BLM	emc0376GB
129.	We have read the Notice of Intent and have reasonable concern regarding the extension of greater sage-grouse conservation measures on BLM lands. The US Fish and Wildlife Service's own documents show that the greater sage-grouse is not legally qualified for listing under the Endangered Species Act. Conservation measures to protect greater sage-grouse from listing are unnecessary and would negatively impact all economic activities across the species' range.	All	Both	emc0381GB
130.	Much like Nevada as a whole, Eureka County is composed of a large federal land holding. Eighty-one percent of Eureka County's land area is made up of federally administered land, primarily Bureau of Land Management and Forest Service. Eureka County is primarily driven by mining, farming and ranching. Nearly all of Eureka County's employment is in the natural resources sector and the community's viability is largely dependent on business and recreational activities conducted on or in concert with federal lands. Since private land makes up only 13% of Eureka County's total land area, dependency on federally administered land limits and is often detrimental to our long-term socioeconomic stability and viability. This threat to our viability is only exacerbated by the layers of regulatory burden that are placed upon multiple uses of these federal lands and a general lack of effort by the federal land management agencies to coordinate their land management decisions with the local plans, policies, and desires of affected counties. This works to undermine sound land management and creates often adversarial relationships between the agency, counties, and proponents of projects on public land.	All	Both	emc0383GB
131.	We look forward, as a Cooperating Agency, to help develop the EIS and not be merely relegated to review and comment. We hope to play an important role is directing the products that will evolve out of this proposed planning process and strongly recommend that the proposals we've already offered be included for further pursuit. Our strongest contention remains that any GSG conservation problem must have economic solutions in order to work. A more effective route would be real, actual planning and conservation actions taking place on the basis of local collaboration for economic benefit and specific needs as opposed to top-down, one-size-fits-all planning that this proposed land use planning approach appears to be taking. We further contend that that the Bureau of Land Management has sufficient regulatory control mechanisms to address healthy rangeland conditions and that piling up more regulations for the sake of having more	All	Both	emc0383GB

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	regulations should satisfy the U.S. Fish and Wildlife without any improvement in actual on-the-ground management.			
132.	In addition, should ranchers find it economically unviable to remain ranching, private land will likely go on the market and quite possibly exit the agriculture sector. As urbanization has been the trend, It would be a shame for more prime agricultural land to go into housing development.	All	Both	emc0390GB
133.	Bottom line...because our livelihood depends on public land grazing we CARE about public lands. Because our livelihood depends on public land grazing we are very willing to work with efforts aimed at wildlife conservation, including that of the greater sage-grouse. Removing livestock from the public rangeland would be detrimental to wildlife, the general public, ranching, and the local economy.	All	Both	emc0390GB
134.	Every EIS and SEIS should be accompanied by a complete economic analysis and an analysis of the impacts of all proposed alternatives on other multiple uses so that unnecessary and unreasonable socio-economic impacts can be avoided. The socio-economic analysis should be guided by a recognized input-output quantitative model.	All	Both	emc0396GB
135.	It is imperative that a stable economic environment be sustained and enhanced so that our members may assist in the conservation of rangeland for the greater sage-grouse.	All	Both	emc0396GB
136.	However BLM must exercise caution that these measures are developed with prudence to ensure that protecting the Sage Grouse is not done by elimination of legitimate and economically viable land uses that are essential to sustain rural communities and provide quality high paying jobs	All	Both	emc0400GB
137.	Many of our long-term clients and prospective new clients have been or will be affected by the proposed project to amend land use plans to incorporate sage-grouse conservation measures. In fact, the conservation measures you propose will negatively impact most economic interests across the species entire range, increasing the regulatory cost and burden to conduct natural resource related activities, both commercial and recreational, and significantly impeding or virtually eliminating such activities, and will severely impact other businesses important to the western economy.	All	Both	emc0402GB
138.	Making the vast areas of the West able to produce income and thus able to provide an income to be good stewards is essential. Something needs to provide the income to pay for the projects and expertise.	All	Both	emc0403GB
139.	A methodology to translate the impacts into dollars, i.e. A mitigation investments; this must include sufficient funding to manage and monitor the mitigation investments. A. Seek to use an existing, transparent, consistent methodology for translating impacts into dollars from all resource projects. B. Commit to a science-based stakeholder-driven process to identify, modify, and get buy-in on a specific methodology. C. The costs of management and monitoring of mitigation investments are the responsibility of the project developer.	All	Both	emc0407GB
140.	We discovered that the US Fish and Wildlife Service's own determinations show that the greater sage-grouse is not legally qualified for listing under the Endangered Species Act. Yet the BLM is now proposing, and implementing under their December 2011 Instruction Memorandums, unnecessary sage-grouse conservation measures that have and will negatively impact all economic activities across the species entire range, increasing the regulatory cost and burden to conduct natural resource related activities and significantly reducing or virtually eliminating such activities. If nothing else, comment on these two facts.	All	Both	emc0409gb
141.	We fimlly believe the continued preservation of Sage Grouse to be of prime importance to prevent its listing under the	All	Both	emc0410GB

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	Endangered Species Act (ESA) but believe that this can be accomplished successfully without undue burdens that could inhibit the ability of recreation. grazing and industry to continue to operate on federal lands and to extract and or use our natural resources to the benefit of the American people and the continued economic viability of our citizens and local businesses.~			
142.	The continued exploration and production of OiL Gas and other resources is an important factor in keeping the social and economic infrastructure on our local area and of this country intact. But further, we firmly believe their partnerships with other entities in the private sector and with govermnent agencies are crucial to the success of this endeavor. The funding these companies have provided will assist in funding research and direct on-the-ground Sage Grouse habitat improvements. The research can increase better understanding of the bini's habits and traits in and around the areas that these projects are located. Cooperative actions such as just described will detinitely help to keep funds available which is very important to sustain longterm projects to increase the sustainability of sage grouse habitat.	All	Both	emc0410GB
143.	Even if this process results in lofty words on paper, there is a whole agency culture that must be changed. This culture enables all existing uses to continue at damaging levels and resources to continually be sacrificed to try to keep grazing, mining, and roading all other "multiple uses" heaped into sage-grouse habitats at the high levels. Part of the socioeconomic analysis has to consist of an honest critique of the agency's own culture and how that culture hinders applying sound environmental protections. This includes agency culture that tends to try to perpetuate a bloated bureaucracy by conducting disturbance project after disturbance project. It must address the typical BLM ID "Teams" - where range staffers typically end up trumping biologists, ecologists and cultural specialists. The agencies must change internal processes to break their old industry enabling molds.	All	BLM	emc0411GB
144.	Socioeconomic impacts: This must include analysis of resources being lost and alternative uses foregone by allowing damaging activities to continue. It must include an honest analysis of the cost to taxpayers of continuing chronic disturbance activities like livestock grazing. Typically, it costs 5-6 times the amount returned in grazing fees just to administer permits and deal with a little of the damage caused (Moskowitz and Romaniello 2002). The Moskowitz and Romaniello analysis does not include the value of spring water flows wasted, polluted, reduced, or lost forever due to erosion and degradation of chronic grazing disturbance - and thus sage-grouse brood habitat losses, the costs of herbicides applied to futilely try to stop weeds spread by grazing from choking understories vital for sage-grouse nesting, and innumerable harmful grazing "mitigation" actions from fences to re-seedings. It must also examine the fire rehab values destroyed as grazing resumes within two years or less of rehab and sufficient recovery of species has not occurred, and the must estimate the millions of dollars of seeding and fire recovery efforts lost to cheatgrass in grazed landscapes. An example of the drain on taxpayers is public lands ranching in the Humboldt-Toiyabe National Forest land of the Ely Westside EIS area. In a good year, the Forest might get $10,000 in grazing fees from the grazing Actual Use that occurs across 500,000 acres of Forest lands. Yet the money spent by the Forest on trying to monitor, build even more livestock facilities, spray weeds, and other actions - greatly exceeds the miniscule agency return on grazing fees which is scarcely enough to put gas in a pick-up to travel the long distances to try to monitor these allotments - let alone pay for equipment and year-round staff time and all the efforts to try to deal with weeds, meadow degradation and loss, Wilderness impairment, and other harms caused by grazing disturbance.	All	Both	emc0411GB

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145.	Potential permittee use of permits to get bank loans based on ungrazable AUMs must be addressed in the socioeconomic discussion. Part of the reason agencies refuse to cut AUMs appears to be bank loans that have been made on AUMs on permits that far exceed the capacity of the land to withstand grazing. Ranchers may get loans based on the number of livestock on the permit, not the number of livestock that have actually been able to be grazed. This is a concern, since public lands permits are used all the time as collateral for bank loans.	All	BLM	emc0411GB
146.	Agencies will very likely claim various benefits to a small elite group of local ranching interests. But often, across areas like Nevada, gold mines and other revenue completely dwarf the very minor to miniscule revenue from grazing. In other areas, retirees and people who live in the West because of its open space and wildlife amenities dwarf ranching in economic effects.	All	Both	emc0411GB
147.	Exploitation of poor workers, including workers here on foreign visas must be examined as part of the human toll and human rights cost of continuing public lands sheep ranching and other livestock grazing across the sagebrush biome. See for example: http://www.capitalpress.com/print/djw-CNTRH2Asheep-021012 .	All	Both	emc0411GB
148.	The losses to the public of Wilderness and all recreational uses and enjoyment, including enjoying natural biological values like sage-grouse in a wild land setting, must be analyzed across all of a range of alternatives. A recent study 6/21/11 on the Department of Interior Economic contributions shows the minimal economic contribution of grazing.	All	Both	emc0411GB
149.	As part of any economic analysis, the full benefits of protection of sagebrush habitats without using the Core/sacrifice model and the derivative Priority habitat model that pushes impacts onto other habitats must be examined. Loss of birds and bats, for example, poses a threat to agriculture and may affect human health, too– as bats (and birds) eat insects that damage crops or that cause diseases like West Nile virus. Protection of these species helps to preserve a very important recreational use of public lands and of the West's human residents enjoyment of their own home sites and local natural areas –i.e. enjoyment of birds.	All	Both	emc0411GB
150.	The BLM and USFS have anticipated sage grouse conservation efforts and highly restrictive conditions aiming at conserving sage grouse are already being written into mining permits. The current socio-economic impacts of sage grouse conservation efforts are much greater than anyone is acknowledging. I believe that many people are hesitant to acknowledge this because they fear retribution in the form of costly delays in permitting. It is difficult, if not impossible, to relax policies once they are in place, especially if those policies are included in land-use plans. The socio-economic impacts of these policies have not been studied. I request that an economic baseline study inclusive of all socio-economic impacts due to land-use restrictions for sage grouse conservation be completed and incorporated into the Final Environmental Impact Statement (FEIS). This should be a standard baseline study conducted by scientific experts in the field of economics.	All	Both	emc171GB
151.	We are interested and concerned about the contractor who will be selected to perform the economic analysis. We request that the BLM ensure the contractor has a proven track record of providing balanced analysis of all the socia-economic Impacts related to sage grouse restrictions, valid existing lease rights and other multiple uses of public lands. In addition, we are concerned about the use of subjective, focus group or "willingness to pay" research by some socio-economic consultants to attempt to quantify the value of conservation by the general public. We do not believe these scenarios provide factual, socio-economic information to compare to actual socio-economlc data provided by stakeholders and local and state governments, such as tax revenues from all multiple users and employment figures based	All	BLM	enc0246GB

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	on BLM's EIS alternatives to be analyzed for these RMP amendments.			
152.	In addit ion to the standard comment below, I'd just like you to know that I am making the trip to Colorado this April specifically to see th is bird! Meaning, there is a financial incentive (tourism, local economies) for you to continue to protect this bird!!!	All	Both	fla0020gb
153.	I can tell you that This species is very popular with my clients and represents a real economic impact for me in addition to the recreational value to the millions (yes we are in the millions) of birders in the US and visitors from foreign countries	All	Both	fla0022gb
154.	The magnificant bird has historic significance as a food source for the native americans and those crossing the prairie in covered wagons	All	Both	fla0100gb
155.	Our family loves the western states and their bounty of natural areas that contain amazing wildlife like these birds. We travel every year out west and spend our money in these natural areas. Please consider that there is a revenue source that is generated by these natural areas, it is a clean, consistent source of capital that needs no loans or financing.	All	Both	flb0037gb
156.	My company Rekluse Motor Sports, makes automatic clutches for off-road motorcycles that are widely used on BLM lands. Availability of motorized recreation trails supports 40+ jobs in Boise and growing. More importantly, BLM motorized trails provide an amazing recreational opportunity that provide fulfillment to tens of thousands of users each year. When considering measures to save the Sage Grouse, please also consider motorized and mountain biking users. I hope my children have the same opportunities I've had to enjoy BLM lands.	All	Both	fle00007gb
157.	I strongly oppose components of the 2010 Conservation Measures that lack the flexibility to adapt to local management issues. The plan should recognize the importance of Off-Highway Vehicle (OHV) recreation to the local economy, the local and outside populations desire for OHV recreation, and the minimal impact that slow moving OHVs have on wildlife.	All	Both	fle0000gb
158.	Economically viable ranching operations provide both stewardship of public lands and economic vitality to local and regional communities. The continuation of livestock production on Oregon's public lands is extremely important, not only for the sustainable production of food and fiber for the United States and worldwide markets, but also for the long-term success of sagegrouse conservation.	All	Both	fli0000gb
159.	Finally, please complete a thorough socioeconomic analysis of implementing NTT report recommendations on landowners and local communities.	All	Both	fxc0003RM
160.	While the impacts of other users, both positive and negative. ar€ peripheral to our operations, the costs of mitigation measure$ are of grcat doficern. Our ratepayers gfow weflry of bearing the vast majority of the cost of salmon and steelhead mitigation while sportslrlen and commercial fishirrg contribute very little to species recovery	All	Both	fxc0006GB
161.	Every EIS and $EIS should be accompanied by a complete economic analysis and afl analysis af the impacts of ail proposed alternatives on other multiple uses so that unnecessary and unreasonable socio-ecortornic irnpacts carr be avoided. The socio-economic analysis should be guided by a recognized input-output quantitative model. Collaboration with local universities could provide valuable insights into the ramifications of the alternatives under consideration.	All	Both	fxc0006GB
162.	It is imperative that a stable economic environment be sustained and enhanced so that our mernbers may assist in the conserva.tion of rangeland for the greater $age-grouse. We appreciate the opportunity to comment on the development of EI$s and SEISs for management of the greater sage-grouse and itn habitat. We believe that we support a wide variety of	All	Both	fxc0006GB

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	users who may all assist in this conservation effort.			
163.	This plan is equal only to the plan for Spotted Owl, which ties up all of the federal timberland in the Western United States forcing us to import building material from Canada to construct a home. This plan would cripple the livestock business and the mining and manufacturing industries in the west and make us, even more than we are now, totally dependent upon foreign third world countries to supply our basic needs.	All	Both	fxc0015GB
164.	New money only can come from one place - The crust of the earth. If we are ever to make this nation the successful, rich nation that it once was, we will need responsible mining. manufacturing, and a well managed livestock business.	All	Both	fxc0015GB
165.	My ranches produce about 800,000 pounds of beef every year. That is enough to feed every person in the State of Nevada for several days. To put an actual food producing operation in jepordy because of an unfounded environmentalist driven act would be unconscionable. Support any action on your part.	All	Both	fxc0017GB
166.	Keeping ranches economically viable is crucial to the continued success of the Sage Grouse.	All	Both	rmc0007RM
167.	In addition to its economic significance, livestock grazing provides irreplaceable environmental and social values. These values contribute irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the EISs/SEISs.	All	Both	rmc0010RM
168.	The BLM should conduct a cost/benefit analysis on both the environmental AND economic impacts of each alternative.	All	BLM	rmc0021GB
169.	MWGA's membership strongly recommends that BLM analyze and examine both the environmental impacts AND impacts to multiple-use activities of changed sage grouse management practices and plans; -This analysis must include an economic cost/benefit analysis for each alternative; - This analysis must address and account for potential negative financial impacts to grazing, energy development, and other multiple-uses of public lands, as well as the economic impact to businesses that support these uses; - Having participated in and reviewed numerous government environmental review documents, MWGA is aware that the socio-economic impact of federal wildlife management policies on local communities is rarely analyzed in detail; - As such, MWGA's membership requests strongly that the preliminary and final decisions on the EIS should be both timely and completely reported to cooperating agencies and to the public, and should be accompanied by a full, detailed, and complete economic cost/benefit analysis on the impact of federal sage grouse management policies and associated public land use restrictions.	All	BLM	rmc0021GB
170.	Conservation and management recommendations, such as the withdraw of activities in critical and/or general sage grouse habitats, will result in significant harm and irreversible hardship to numerous industries. The EIS should include an extensive and detailed socioeconomical study identifying direct, indirect, cumulative, and financial impacts to all individuals and industries affected by the proposed listing of the sage grouse. The EIS should identify the economic impact to individuals, industries, and State Governments. The EIS should identify what the personal cost is to individuals in the mining, oil and gas, and other industries should the sage grouse be listed and industries are halted from operation. The EIS should identify how many jobs would be lost and how many industry actions would be halted or reduced should the sage grouse be listed.	All	Both	rmc0027GB

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171.	Mitigation of impacts to sage grouse habitat by a proposed project must be included if the government is serious about considering the socioeconomic impacts of their actions. Creating new habitat or relocating habitat to where past habitat had been previously destroyed would appear to be a win-win scenario for both the sage grouse and those that utilize public lands. If the results of mitigation equate to no net decrease or even an increase in sage grouse habitat wouldn't that benefit both the bird and our society as a whole?	All	Both	rmc0027GB
172.	Implementation of a statewide mitigation bank, for all entities to donate to, might be beneficial. Such a statewide bank might centralize funding so that more effective habitat restoration can be implemented (because it is implemented on a larger scale rather than piecemeal projects). All mitigation requirements, whether it is a statewide bank or individual mitigation, needs to be affordable by all entities using public lands (from the local rancher, large or small mining operator, exploration company, recreationist, renewable energy company, etc.).	All	Both	rmc0027GB
173.	Each sub-regional EIS document should thoroughly evaluate a No Action Alternative to quantify the impacts associated with ongoing implementation of the many existing local, state, and federal conservation measures and the existing BLM and USFS policies to protect sage-grouse habitat. Specifically, the EIS documents should evaluate the following: Future Habitat Improvements: The future, long-term habitat improvements that could occur with ongoing implementation of the existing greater sage-grouse habitat conservation measures in Nevada and elsewhere. Future Economic Benefits: The economic benefits to state and local governments that would likely occur if the current Land Use Plans remain in effect allowing future mineral exploration and development, oil and gas exploration and development, rights-of-way ("ROW") development, grazing, and other multiple uses of public lands and national forests with sage grouse habitat rather than implementing the land use restrictions and prohibitions recommended in the December 20 11 NTT Report. The Greater Sage-Grouse is Not Listed in 2015: The impacts that would occur if the USFWS decides to maintain the "Warranted but Precluded" status because there are other higher priority species that need to be listed by 2015, or determines that listing the greater sagegrouse is not warranted because the existing conservation measures in Nevada and elsewhere are having sufficient success to make listing unnecessary. USFWS Lists the Sage-Grouse in 2015: The possibility that the USFWS will list the greater sage-grouse despite the conservation measures that BLM and USFS develop in conjunction with this EIS process.	All	Both	rmc0029RM, rmc0060GB
174.	The EIS documents must quantify the adverse impacts to mineral exploration and development and to the availability of domestic minerals that would occur from implementing the recommendations in the NTT Report. The EIS documents must fully consider alternatives that would comply with FLPMA, MUSYA, and the U.S. Mining Law and thus eliminate inconsistencies with these laws. The EIS documents must provide a detailed discussion of how the Proposed Action, Agency Preferred Alternative, and Alternatives Considered in Detail would allow mineral development or discourage - and in the case of withdrawals from mineral entry - prohibit mineral development. This evaluation should measure the impacts on a state-by-state basis and on both a national scale.	All	Both	rmc0029RM, rmc0060GB
175.	The agencies should consider not only the environmental consequences in the NEP A analysis but also the impacts to the human environment and economy, including grazing, mining, oil and gas and other multiple uses.	All	Both	rmc0032GB
176.	The Organizations are very concerned that possible negative economic impacts from the Conservation measures simply have not been addressed in the preparation of the proposal, which has allowed the proposal of numerous absolute	All	Both	rmc0033GB

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	standards in the Conservation Measures. While the Conservation Measures are not technically proposing designation of critical habitat areas for the grouse, the measures are proposing a management structure that is very similar. Federal statutes and regulation require that BLM must always address economic impacts in all planning processes as follows: U(c) In the development and revision of land use plans, the Secretary shall- (2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; ... " Under relevant statutes and guidelines for endangered species, the USFWS must address economic impacts when designating critical habitat for a listed species. These statutes provide: (2) The Secretary shall designate critical habitat, and make revisions thereto, under subsection (a)(3) of this section on the basis of the best scientific data available and after taking into consideration the economic impact, the impact on national security, and any other relevant impact, of specifying any particular area as critical habitat. The Secretary may exclude any area from critical habitat if he determines that the benefits of such exclusion outweigh the benefits of specifying such area as part of the critical habitat, unless he determines, based on the best scientific and commercial data available, that the failure to designate such area as critical habitat will result in the extinction of the species concerned. While these statutes do not provide any categories of management activity that may be performed without economic impact analysis, the Conservation measures fail to provide for any flexibility to address disproportionate economic impacts from the absolute standards proposed for the management of roads and habitat areas. The Organizations believe these standards will result in numerous negative economic impacts that must be addressed under Federal statutes and regulations. The failure to address these impacts would be a violation of the above statutes and numerous other guidelines.			
177.	Is the economic loss to individuals, industries, local and state governments worth the federal listing of sage grouse? What is the economic threshold when a species should be listed? Should a species be federally listed if it results in undue harm, significant hardship, and economic devastation to multiple industries across multiple states? Is the listing of the species worth the detrimental long term loss to individuals and industry? These issues should be addressed and analyzed in the proposed EIS.	All	Both	rmc0035GB
178.	Should the sage grouse become listed, or should restrictive conservation measures be placed on the species and its habitat, it will cause irreversible damage and significant economic loss across the western U.S. Listing of the sage grouse would personally affect me and significantly limit my ability to obtain employment in the State of Nevada. If industry is limited (either by the land where they can operate, hours of operation, or imposed with unreasonable or unaffordable mitigation), they will reduce operations within the state and they will not need professionals like me to assist them with environmental permitting. The full socioeconomic impacts of the decision to list (to individuals and industry), and the implementation of restrictive conservation measures to industry need to be fully analyzed and disclosed in the EIS (direct, indirect, and cumulative impacts). The decision to list (or not to list and manage in accordance to existing BLM IMs) the species needs to take all socioeconomic ramifications into consideration	All	Both	rmc0035GB
179.	The EIS must examine the negative economic impacts to Renewable Energy in detail; such as publically subsidized tax breaks to developers; and loss to visual amenities (both day and nighttime) and viewscapes will have on regional tourism and recreation. For example, in Union and Baker counties there has been no significant increase in employment owing to the wind farm near Telocaset. There has been no significant rural development related to the Renewable Energy project,	All	Both	rmc0036GB

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	other than the wind farm and transmission lines.			
180.	The Economic analysis should estimate potential increased costs for fire suppression related to Juniper treatment areas.	All	Both	rmc0036GB
181.	What has been the actual cost ofthe SCS Juniper Management program in Oregon since 2002; and how many acres of Juniper have been treated on public and private land? What is the actual average cost/acre of the Juniper treatment in Oregon since 2002?	All	Both	rmc0036GB
182.	Anticipating the complex interconnections between man, the environment and the potential economic impact that changes in land use plans could have on the county's economic base, the plan at AG19 includes, "The County advocates grazing policies on Federal and state lands which support the economic viability of related private livestock operations while maintaining the long-term productivity of rangeland ecosystems. Proposed changes in resource management policies regarding rangeland use need to consider and mitigate potential economic, social and cultural impacts to Lassen County citizens and communities, and impacts to related private lands in Lassen County."	All	Both	rmc0038GB
183.	I am writing this as a concerned citizen regarding the debate over listing or even considering the sage grouse as threatened or endangered. Like the spotted owl case, a listing on the ESA would impact millions of residents, and hundreds of thousands of jobs directly and indirectly.	All	Both	rmc0047GB
184.	Along with this, there is the personal impact on every family's cost of living, through higher energy prices, as well as higher expenditures on meat products as a result of reduced grazing opportunities.	All	Both	rmc0047GB
185.	The Proposed Planning Strategy is largely silent on the economic impacts. In light of declining budgets and increasing national debt, careful consideration needs to be given to management strategies that can be implemented and not adversely impact agency budgets, national debt and local economies. Many local economies depend on access to public lands within the proposed planning areas as an economic engine. We recommend that a complete economic analysis of the management actions proposed be studies from the aspect of 1) What is the impact of the proposed activity on the agency budget; and 2) What is the impact of the proposed activity on the local communities.	All	Both	rmc0061GB, rmc0035RM
186.	Economic viability of properly managed livestock grazing operations depends upon the integration of BLM, and often, Forest Service allotment lands. Otherwise, private grazing lands essential to sage-grouse will be more likely to be converted to other uses, usually to the detriment of sage-grouse.	All	Both	rmc0063GB
187.	Range Management / Grazing Range Management or Grazing (domestic livestock and wild ungulate) is a very important component of Garfield County's traditional ranching heritage and wildlife herd management which requires working together with our public lands. In preparation of the EIS, Garfield County recommends the BLM work closely with the Cattleman's Association and the Wool Growers Association for both Colorado and other states which are also affected by the EIS to gain their valuable input into this process.	CO	Both	emc0058RM
188.	Socio-economic Impact It is understood the National SGS Report is not intended to address the socio-economic impact of the prohibitions/conservation measures it suggests such as the 4-mile NSO buffer and 3% disturbance limit. The County strongly recommends the BLM carefully consider the structure of the EIS such that it contains a section devoted to a credible analysis of current and likely future conditions in the region's energy extraction industry. More to the point, Garfield County challenges the apparent approach the BLM is taking in the GSGCM report to increase its regulatory	CO	BLM	emc0058RM

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	controls over the oil and gas industry and other development which will have the adverse effect of reducing employment and further eroding the County's economic base; to the contrary, Garfield County believes the BLM should be a leader in encouraging responsible multiple use and resource development opportunities to stimulate economic growth which is vital to our economy and that of northwest Colorado. This EIS should document and consider the dramatic economic changes that have transformed the region's economy in recent years. Garfield County has experienced a pronounced downturn in economic activity, which has significantly altered the economic relationships between activities on public lands and the local economy. These changes, evident now for more than three years, must be more accurately characterized and more reasonably considered in all of the proposed management alternatives that are to be presented in the EIS. In recent years, the economics of natural gas permitting, production and compliance have changed, dramatically leaving Garfield County producers competitively disadvantaged and very sensitive to cost of production changes. The EIS needs to include a contemporary and accurate socioeconomic analysis that acknowledges this industry reality.			
189.	Garfield County's concerns, more simply put, are that BLM's potential implementation of Conservation Measures from the GSGCM report are not warranted in Colorado, and such an approach would result in a virtual moratorium on energy development severely impacting the economy of the County and northwest Colorado, further exacerbating an already economically depressed and challenged area. NOTE: This comment includes Table 3: Impacts to Lease Sections in Garfield County	CO	BLM	emc0058RM
190.	A very common concern from industry and private land owners in northwest Colorado is not the need or requirement to protect the environment, but is the repeated changes in regulatory guidance and unknown potential impacts from long, drawn-out environmental planning processes. Because of this, Garfield County has seen many operators and private markets/investors hold off or postpone projects and investments in capital and hiring of employees given the length of time and uncertainties given NEPA processes and almost inevitable litigation. Additionally, during our review of the greater sage-grouse issue for this scoping effort, we were quite surprised at the amount of literature and planning documents all recently completed for this species, and we again raise the concern over repetitive planning processes which introduce uncertainty to our constituents and industry. To briefly review the guidance documents which are all designed to provide a "management plan" for the public and industry to plan around, we have observed and reviewed the following: 1. A Report on National Greater Sage-Grouse Conservation Measures (BLM 2011) 2. Colorado greater sage-grouse conservation plan (CPW, 2008) 3. Conservation assessment of greater sage-grouse and sagebrush habitats (Western Association of Fish and Wildlife Agencies, 2004). 4. Conservation of Greater Sage-Grouse on Public Lands in the Western U.S. Implications of Recovery and Management Policies (Policy Analysis Center for Western Public Lands, 2002) 5. Greater sage-grouse comprehensive strategy (WAFWA, 2006) 6. Greater Sage-Grouse Conservation Plan: Parachute-Piceance-Roan (BLM, CPW and others 2008) 7. Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats (2011) 8. Guidelines to manage sage-grouse populations and their habitats (Connelly et al. 2000) 9. National Sage-Grouse Habitat Conservation Strategy (BLM 2004) 10. US Fish and Wildlife Service 12 Month Findings for Petitions to List the Greater SageGrouse (2010) These reports are in addition to the volumes of scientific articles on sage-grouse ecology, indeed sage-grouse is likely one of the more studied species, and there is a large amount of scientific literature available. Garfield County contends that there are already existing and approved plans for greater sage-grouse	CO	Both	emc0058RM

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	within northwest Colorado, and having the public, industry and cooperating agencies enter into yet again another "planning effort" immediately on the heels of recently completed planning efforts is an undue burden on already taxed public resources, and will again provide another reason for industry and private enterprise to seek other areas for doing business.			
191.	Jackson County remains an agricultural county. Our custom and culture is based on the agricultural lifestyle. Grazing on the BLM is essential to maintain our agricultural community as well as the important products that we produce (e.g. hay and beef). We request that the BLM conduct a thorough socioeconomic analysis when considering any actions recommended in the NTT report that would prioritize sage-grouse over livestock grazing. Specifically, the study of this EIS should consider the social effect upon young men and/or women in Jackson County who wish to consider production agriculture as a career. When these young people look at the area affected by PPH in Jackson County, they may choose not to pursue a career in production agriculture. Currently 30% - 35% of the 60 students attending North Park High School are enrolled in Agriculture education classes. Of these 30% - 35%, many (20%) would choose to ranch if there was a way for them to enter the ranching business. The other 80% may enter agriculture support careers. Therefore, the BLM Sage-Grouse EIS should measure the effect on the potential future ranching population in Jackson County.	CO	BLM	emc0060RM
192.	The NTT report does not adequately address lek viewing. Lek viewing is an important seasonal recreational use in North Park. The local NPSGWG North Park Conservation Plan does address this impact and recommends allowing lek viewing provided that lek viewers follow appropriate lek viewing etiquette. Lek viewers bring a substantial amount of money into Jackson County in April - a time when almost no other recreationists are coming to the county. If the BLM is not going to allow commercial permits for lek viewing, then we would request that this economic loss be included in the socioeconomic evaluation of the sage-grouse EIS. Please also include an analysis of removing the opportunity for wildlife viewing for a growing segment of the public.	CO	BLM	emc0060RM
193.	Finally, and most importantly, Jackson County has an extremely small assessed value compared to neighboring counties in sage-grouse range in Colorado. The socioeconomic analysis in the Kremmling Field Office Draft Resource Management Plan acknowledges that small changes to BLM land use may have disproportionate economic impacts. Because of the small assessed value of community, negative impacts to the recreation, agriculture, oil & gas, and mineral industries which drive the local economy could be devastating. The NPSGWG requests that an extremely thorough socioeconomic analysis be conducted of the impacts from the NTT Recommendations on the economic viability of Jackson County.	CO	BLM	emc0060RM
194.	Because of constantly improving technology utilized by the oil and gas companies, the language of 20 or 40 acre spacing is quickly becoming archaic. With directional drilling and dependent on depth and subsurface geology, producers can and do approach or exceed effective 20 acre spacing off of one pad in a section. It is not uncommon to see well pads with 24 individual wells and even some with up to 32. Horizontal drilling and sequential fracing techniques are game changers, the impact of which we are just beginning to appreciate. Any discussion of restrictions of surface occupancy or development thresholds should include the new reality of being able to continue to extract the oil and gas resource from the areas being developed through new technology. This may take a portion of the economic sting out of NSO restrictions.	CO	Both	emc0061RM
195.	We would ask that you remember that sage grouse habitat is also human habitat and that alternatives cannot be developed considering only the bird. While we understand the dire economic consequences of having the greater sage grouse becoming a listed species, we ask that the impacts on the people that live and work in our County be considered while	CO	Both	emc0061RM

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	developing the alternatives in the EIS. Thank you for the opportunity to comment on this EIS scoping.			
196.	The proposed EIS and SEIS will cover a significant portion of Western Colorado's counties; the center of which are Moffat and Jackson counties, there is major impact in Garfield, Rio Blanco, Grand and Routt Counties as well as a more limited impact in Mesa and Summit Counties. Ranching, natural resource development and tourism are major economic drivers for the communities and residents of these counties. For decades, these communities have worked with BLM to develop responsible RMP's to protect the public lands in these areas while working with organizations to allow for reasonable economic growth and stimulation.	CO	Both	emc0068RM
197.	Ranching has a long, rich history in the Northwestern Colorado. Ranches in Western Colorado rely on public land grazing leases for survival and to make a contribution to the nation's food supply. Grazing and sage grouse habitat are inextricably related. Properly managed, grazing will enhance sage grouse habitat; indeed there is a direct correlation to reduction in grazing and reduction in the number of sage grouse.	CO	Both	emc0068RM
198.	CLUB 20 believes that local, state, and range-wide plans should work in cooperation with existing land uses to manage sage grouse and sage grouse habitat. Due to interdependence between varying land uses, it is imperative that sage grouse management does not take an overriding role and is balanced with existing land uses. Successful grouse conservation is dependent upon the mutual well-being of the human communities that live in Western Colorado. Sage grouse conservation goals must sustain the social, cultural, and economic lives of the citizens of Western Colorado, as grouse and humans are mutually dependent upon the habitat.	CO	Both	emc0068RM
199.	Socio-Economic Impacts Must Be Considered in Designing Alternatives - A cursory review of a Greater Sage-grouse Priority Map for Northwest Colorado indicates that a major portion of our region is included in either preliminary priority habitat or preliminary general habitat. Virtually all of Moffat County is included, as well as significant portions of Routt County that overlap known mineral resources that would support existing and future coal mining. This area's rural economy is based on coal mining, oil and gas production, agriculture, and seasonal hunting. These two counties, along with portions of Rio Blanco County, are responsible for over half of Colorado's coal production. If only three percent of high priority areas can be disturbed, it would appear that Moffat County in particular can have little or no expanded economic development to support its citizens, and current economic activity on the land may be threatened as well. This approach drives a draconian result; therefore alternatives presented in an EIS should be crafted with due regard for human inhabitants of habitat areas as well as the greater sage-grouse.	CO	Both	emc0071RM
200.	In conclusion, Twentymile Coal, LLC urges a balanced approach in preparing an Environmental Impact Statement which presents a wide range of alternatives that recognize and give effect to not only conservation of the sage grouse, but allow for continued economic activity in Northwest Colorado. This region contains a high percentage of federal lands, but also is heavily dependent on the use of those lands for mining, oil and gas development, grazing, and recreation to sustain the population that lives in the area. We appreciate the opportunity to comment on this proposal, and urge your careful and thoughtful consideration of the considerations outlined in this letter as you move forward.	CO	Both	emc0071RM
201.	Moffat County encourages a thorough analysis, including multiplier effects, that specifically quantify dollar estimates of the impacts of alternatives being considered in this EIS. While the development of traditional federal agency planning	CO	BLM	emc0076RM

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	documents is very limited on the social and economic analysis, especially when it comes to quantifying dollar estimates of impacts, the Little Snake Resource Management Plan is significantly better than traditional documents. It specifically identifies dollar figures associated with impacts of each alternative in the RMP. Furthermore, it categorizes dollar impacts regarding each sector of land use. This is a result of tremendous local involvement and hiring Colorado State University to conduct the social economic impact of alternatives in the Little Snake Resource Management Plan. Moffat County uses this example to encourage BLM in the development of the Sage-grouse EIS to not fall into traditional federal agency social economic analysis methods where merely general impacts are described in words, with little analysis occurring regarding specific dollar impacts. Moffat County requests BLM place realistic dollar figures, including dollar figures of multiplier effects and tax base, by the restriction of energy development and removal of grazing privileges if the Technical Report were implemented, in addition to all other alternatives considered in the EIS.			
202.	First of all, I think that an economic impact study has to be done on any proposal that would affect Jackson County. Negative impacts on agriculture, oil and gas and recreation that drive the local economy could be devastating to Jackson County	CO	Both	emc0077RM
203.	Colorado's mining industry, according to a study by independent accounting and auditing firm PriceWaterhouscCoopers, was responsible for 9,000 direct jobs and supported 48.000 jobs overall. Mining accounted for over $6 billion in direct contributions to Colorado's gross domestic product. Labor income of $3.2 billion. And tax contributions of more than $1.5 billion. In 2008. Most of these jobs arc located in Western Colorado and will be directly and adversely impacted; thus great care must be given in structuring a conservation plan.	CO	Both	emc0143RM
204.	A cursory review of a Greater Sage-grouse Priority Map for Nmthwest Colorado indicates that a major portion of that area includes either preliminary priority habitat or preliminary general habitat. Virtually all of Moffat County is included as well as portions of Routt County critical for existing and future coal mining. This rural economy is based on coal mining. Oil and gas production. Agriculture. And seasonal hunting. These two counties. Along with portions of Rio Blanco County, are responsible for over half of Colorado's coal production. Lf only 3% of high priority areas can be disturbed, it would appear that Moffat County in particular can have little or no expanded economic development to support its citizens, and current economic activity on the land may be threatened as well. We have similar concerns for affected lands in Garfield County. This approach drives a draconian result; therefore alternatives presented in an EIS should be crafted with due regard for human inhabitants of habitat areas as well as the greater sage-grouse.	CO	Both	emc0143RM
205.	In conclusion, the Colorado Mining Association urges a balanced approach in preparing an Environmental Impact Statement which presents a wide range of alternatives that recognize and give effect to not only conservation of the sage grouse, but allows for continued economic activity in Northwest Colorado. This region contains a high percentage of federal lands, but also is heavily dependent on the use of those lands for mining, oil and gas development, grazing, and recreation to sustain the population that lives in the area.	CO	Both	emc0143RM
206.	Local social and economic impacts must be analyzed for Northwest Colorado. The Little Snake RMP includes an in-depth analysis of these impacts in cooperation with Colorado State University. The Districts respectfully request that this EIS utilize the Little Snake RMP data and analysis rather than do the minimal analysis that is typically conducted within an EIS. We also strongly encourage this type of data collection and analysis to be conducted for the remainder of the Northwest	CO	Both	emc0178RM

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	Colorado within the EIS.			
207.	Natural areas that are habitat for sage-grouse also support some our state's largest and most prized big game herds, and more than 350 other kinds of animals and plants. Protecting these areas will help conserve Colorado's wildlife, including deer, antelope, and songbirds. I enjoy the outdoor recreation opportunities that these natural areas provide. I also feel that conserving these natural wildlife areas is important to the success of wildlife related recreation and tourism, which provides good jobs and is important to our economy.	CO	BLM	fll0000RM
208.	The BLM should put mandatory standards in place to safeguard sage-grouse. Because inappropriately located oil and gas development has been formally recognized by U.S. Fish & Wildlife Service as being a major threat to sage-grouse in Colorado (and throughout the eastern range), the Resource Management Plans cannot rely on voluntary standards to minimize the negative impacts of oil and gas drilling. BLM should require companies to act responsibly to protect greater sage-grouse. I respectfully ask that the BLM put important safeguards in place in its long-term management plans, to save the sage-grouse and conserve our land, water and wildlife for future generations to enjoy. Thanks for your consideration.	CO	Both	flm0000RM
209.	Southern Routt County and much of northern Eagle County remains an agricultural landscape. Ranchers provide much of the private land habitat for sage-grouse. The majority of the Southern Routt portion of the NESR sage-grouse population area is private land. The NESRWG requests that the BLM EIS analyze the potential negative impacts of making it more difficult for ranchers to make a living. Located between the Vail Valley and Steamboat Springs, the Northern Eagle/Southern Routt area is under pressure for increasing housing development. If ranchers are no longer able to make a living, more of them will sell their land and some it will likely be subdivided for housing development.	CO	Both	fxc0003RM
210.	Oil and gas operators in the Piceance Basin, including Oxy, as well as the economic viability and livelihood of employees, contractors, and communities in the area could be significantly impacted by the action proposed by BLM	CO	BLM	rmc0021RM
211.	Finally, the VRLP urges BLM and the Forest Service to proceed with caution in implementing the prescriptions for sage grouse management found in the 2011 Technical Team Report. The majority of these conservation measures lack supporting data and many will cause harm to rangeland resources and destroy local communities and their economies. BLM is on the verge of making the same errors that occurred with the Northern Spotted Owl. The listing decision and subsequent designation of critical habitat for the spotted owl destroyed the logging and sawmill industries for three states based on the premise that logging of old growth timber was causing the decline of spotted owl populations. Comments submitted in 1989 on the listing decision suggested that predation by the barred owl was causing undetermined levels of mortality but this was brushed aside. Twenty years later, much of the designated critical habitat has burned, taking the old growth habitat and the owls with it. Notwithstanding no logging for 20 years, the spotted owl status is unchanged. Now DOI proposes to shoot barred owls given the rates of predation on the remaining spotted owls, 77 Fed. Reg. 14036 (Mar. 9, 2012), while doubling the critical habitat that will be closed to logging, 77 Fed. Reg. 14062 (Mar. 8, 2012); c.f. 77 Fed. Reg. 12985 (Presidential memorandum directing USFWS to consider economic impacts, including some logging in the expanded critical habitat). The sage grouse debate is also similar to the spotted owl in that just as the owl was a pretext to stop logging, the sage grouse is a pretext to stop energy and mineral development and livestock grazing. Sound data and objective analysis would have avoided a listing of the spotted owl then and should preclude a listing of the sage grouse now. The spotted owl experience provides a profound lesson on the severe consequences that a listing decision can have on a	East	Both	emc0155rm

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	region. When it is done with incomplete data, the outcome is no better for the species despite the generation-changing human and social costs. BLM has one chance to avoid a similar debacle but it must return to scientific principles that require objective evaluation of a sound data.			
212.	We would ask that the BLM thoroughly evaluate the socio -economic impacts of additional habitat conservation measures and restrictions imposed on uses and users of the BLM lands in the Western Region. These include, but are not limited to recreation, mining, logging, livestock, infrastructure developments etc. It is our belief that GSG numbers are currently well above levels that would further habitat restrictions and that those numbers will never fall to a truly biologically unsustainable number in the foreseeable future.	GB	Both	emc0384GB
213.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	GB	Both	flj0001gb
214.	All decisions should be directly addressed by the lead agency and based on independently verified data. Every EIS and SEIS should be accompanied by a complete economic analysis and an analysis of the impacts of all proposed alternatives on other multiple uses so that unnecessary and umeasonable socio-economic impacts can be avoided. The socio-economic analysis should be guided by a recognized input-output quantitative model. Collaboration with local universities could provide valuable insights into the ramifications of the alternatives under consideration. Alternatives which are the least restrictive to multiple-use activities should be give top priority.	GB	Both	rmc0056GB
215.	As you consider grazing allotments please keep in mind the agriculture based economy in the Magic Valley and the possible negative impact that the reduction of grazing rights will have on the base economy in Twin Falls County.	IDMT	Both	cfc0021GB
216.	My livelihood, as well as many other family ranching businesses across the Western United States, depends on the ability to graze livestock on public and private lands. As such, it is in ranchers' best interest that the lands are managed to optimum condition, which is both ecologically and economically beneficial. I am concerned that the pending effort to significantly amend the land use plans will create unnecessary restrictions on ranchers' ability to graze livestock and will result in unintended consequences that will be more harmful than helpful to sage	IDMT	Both	flh0000GB
217.	It is imperative that a stable economic environment be sustained and enhanced so that ranchers and other stakeholders may continue to assist in the conservation of rangeland for the greater sage -grouse	IDMT	Both	flh0000GB
218.	Livestock grazing is compatible and beneficial to greater sage-grouse habitat conservation. This has been proven by independent, peer-reviewed scientific analysis, much of which was conducted in our own state. Ranchers are the stewards of the greater sage-grouse habitat on both the private and public range lands. Allowing ranchers the continued use of public lands without unnecessary restrictions due to the potential listing of a species with such a large habitat encourages stewardship and prevents fragmentation through development. It is imperative that a stable economic environment be sustained and enhanced so that our members may assist in the conservation of rangeland for the greater sage-grouse.	MT-RM	Both	emc0157RM
219.	It should also be constantly reiterated, that Montana and Wyoming have, what are considered to be, sustainable sage grouse populations. BLM and the state agencies need to keep this at the forefront, when deboerating this issue. It is imperative, that you avoid hurting our livestock operations. These ranches are extremely important to the local economy, and are a good, safe source of food for our nation. It is also worth noting that this food source is grown from an	MT-RM	Both	rmc0012RM, rmc0022RM

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	ecologically healthy, renewable resource.			
220.	Our county has formally agreed to be a cooperating agency with BLM, regarding the sage grouse issue. We appreciate the opportunity to provide input specific to this important issue. Judith Basin County has a strong agricultural economy, with over $31 million generated from livestock and livestock products, and it very important to this community that the agency works directly with the local landowners to ensure both sage grouse and family ranchers are sustainable.	MT-RM	Both	rmc0023RM
221.	Moreover, I believe that the economic benefits to our State, Nevada, from mining development, energy development, expanded cattle ranching, farming and so on in areas where habitat designations have been made are primary as they provide subsistence benefits to the human species over any consideration for.preservation of "so called" sage grouse habitat.	NVCA	Both	emc0023GB
222.	Churchill County Board of County Commissioners passed a resolution in December 2011, adopting the "Policy Plan for Public Lands" (Plan) of the Churchill County Master Plan. The Plan is a guide, developed by the citizens and local government regarding the use of public lands in Churchill County. The Plan addresses federal land use management issues and is intended to be used as a positive guide for federal land management agencies in their development and implementation of federal land plans and management actions. The Plan outlines expectations and desires of the people of Churchill County and requires consultation prior to decisions that affect public lands within the County's boundaries. Churchill County is desirous of cooperation from the Bureau of Land Management and other federal agencies. If the U.S. government (under any agency) intends to change uses or availability of resources on public lands in a way that will impact current historical and cultural uses, input from the citizens of the County is required and the Board of County Commissioners will be consulted. The multi-use nature of public lands requires that management decisions be made with the public's interest at the forefront and careful consideration to maintaining a sustainable economy and sustainable resources for future generations.	NVCA	Both	emc0151
223.	I am extremely concerned about the impact the above referenced Notice of Intent will have on the range livestock industry in Nevada. Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities.	NVCA	Both	emc0202GB
224.	Restricting oil and gas leasing on public lands (BLM lands) for sage grouse habitat (or even “potential” habitat areas has already cost the state of Nevada over $1,000,000. if this policy continues, it will not only result in lost revenue to the state of Nevada but will adversely impact my profession (and all other geologists) working in the state of Nevada.	NVCA	Both	emc0245GB
225.	Considering that Sage Grouse are not at risk in the state of Nevada, has the BLM contemplated any impact of potential lawsuits relevant to loss of income from the State of Nevada or other professionals (geologists) as a result of the BLM restricting leasing and or exploration under false assumptions that leasing (or exploration) adversely impacts the Sage Grouse population in Nevada.	NVCA	Both	emc0245GB
226.	The rare minerals that occur on these lands are a valuable national asset. Exploration for these minerals is one of many valid multiple uses that is an important part of the economy of Nevada and its rural areas. The loss of large areas of prospective land due to the proposed Sage-grouse Conservation Measures would drastically reduce long-term exploration and mining activity in Nevada. The consequence of this reduction would be the significant impoverishment of	NVCA	Both	emc0272GB

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	rural communities and certain business sectors of Reno and Las Vegas that presently enjoy a robust business climate yielding hundreds of millions of dollars in taxable revenue to the state and counties of Nevada. The value of these resources must be weighed very carefully against an accurate assessment of the sage-grouse habitat and population trends.			
227.	Ranching, mining, hunting and recreation are a huge part of Nevada's economy. Listing the sage grouse would cause a great hardship on Nevada and all of the western United States' already suffering economy.	NVCA	Both	emc0273GB
228.	In particular, Barrick is concerned that some of the policiesincluding locatable minerals withdrawals and disturbance prohibitions in priority habitat-could result in unnecessary lost jobs, wages and tax revenues in Nevada, a state that is already under severe economic distress.	NVCA	Both	emc0277GB
229.	vii. Socioeconomic impacts Precious metals are a non-renewable resource; therefore sustain ability of the direct and indirect mining workforce is dependent on the continued expansion of mines and the exploration and development of new deposits. Mineral resources are only located where specific geologic conditions and events occurred; they are site-specific. Consequently, mineral deposits that occur in sage-grouse habitat must be developed in sage-grouse habitat. Moving to non-habitat is not an option. Thus, it is no overstatement to say that overly restrictive sage-grouse protections that preclude mineral development would be devastating to mining workers, local communities, and the State of Nevada. The mining industry is a significant component of Nevada's economy as a whole and the economic foundation of many communities in rural Nevada. Nevada accounts for nearly 80% of gold production in the United States and gold represents nearly 90% of the value of the total output of the mineral industry in Nevada. Barrick produces approximately 60% of all the gold produced in Nevada, with 2011 production of over three million ounces valued at $3.8 billion dollars. In addition to investing over $3.6 billion dollars in building the infrastructure associated with these world class mining operations, Barrick spent over $41 million dollars in 2011 to explore for additional mineral resources in Nevada and will continue to invest at this level in future years. The mining industry has been the only bright spot in a state economy which has declined dramatically due to the economic downturn. No other sector of the economy has increased its contribution to state services, education and local governments more than the mining industry in the last four years-in fact nearly all other major sectors' contributions have declined.32 Barrick's mining operations in Nevada provide the largest percentage of the mining sector's contributions to Nevada in these areas. In 2011 Barrick employed over 3,950 Nevadans directly and is estimated to have generated over 20,600 jobs in businesses in Nevada which supply goods and services to support its mining and mineral exploration activities.33 Jobs in the mining industry are on average the highest paid in the state. Barrick's purchases of goods and services in the state of Nevada amounted to over $900 million in 2010. Direct taxes paid by Barrick, which included the Net Proceeds of Mines Tax, Sales and Use Tax, Property Tax, and Modified Business Tax, amounted to $194 million in 2011. Approximately 40% of these tax payments stay with local government and fund city and county operations, local education expenditures, and other important public services. In a number of cases, this tax revenue is the most significant revenue received by local governments near Barrick's mine sites. Mining is vital to the economy of northern Nevada. For example, the population of Elko, Nevada increased, primarily from mining related activity, from approximately 5,500 in 1980 to approximately 18,000 at the 2010 census. Without expansion and new discoveries on public lands, which comprise nearly 85% of the state of Nevada, the mining jobs that support Elko and surrounding areas cannot be sustained. Furthermore, the impacts of lost mining and mine support jobs would then spread	NVCA	Both	emc0277GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	to the public sector (including law enforcement, fire fighters, teachers, and regulatory jobs), medical, retail, wholesale, real estate, and other sectors of the local economy. Although mining has historically been a cyclical industry, downturns are typically related to lack of economic mineral resources or the means to acquire and process the minerals, not regulatory restrictions on mineral entry opportunities. It is therefore absolutely critical that the agencies act cautiously before creating a "bust" when mineral availability and processing technology are sufficient to carry the mining boom for many more years. It is also critical that the EIS process fairly consider these potentially devastating economic impacts.			
230.	The Soils in this Geothermal Area are not Suitable for Plant Growth: The Hog Ranch deposit was formed by a very shallow hydrothermal system (i.e., a hot spring) that produced soils and rock types that are not favorable environments for plant growth. Consequently, there are many areas of very sparse vegetation probably due to naturally occurring toxic minerals related to hot springs fumaroles and general degassing of the hot-springs level geothermal system that deposited the gold at Hog Ranch.	NVCA	Both	emc0287GB
231.	Economically viable ranching operations provide both stewardship of public lands and economic stimulus and viability to local and regional communities. The conservation of rangelands for livestock production is extremely important, not onlj' to the sustainable production offood and fiber for the United States and worldwide market.	NVCA	Both	emc0304GB
232.	I am writing in regard to the withdrawals of Public Lands to implement the 2011 Greater Sage-Grouse Conservation Plan. I have great concern for myself and my fellow workers here in Nevada. Sir, we need jobs.	NVCA	Both	emc0320GB
233.	To shut down the natural raw industries, whether it be mining, subsurface extraction of either oil & gas or geothermal, surface use of ranching and farming, seems to me that you are cutting future revenue for your own existence as an agency to manage the Public Lands as well as that of the State of Nevada, along with the other Western States for generations to come.	NVCA	Both	emc0320GB
234.	Scoping Issue No.5 The EIS Documents Must Evaluate Ways to Minimize Risks to Mining Claims Owners who Have Made Significant Investments on their Claims Prohibiting mineral exploration and development on the lands shown in magenta on the BLM - USFS habitat map would result in significant economic hann to the State of Nevada and the many companies, including NVMRA members, whose mineral projects are located in priority habitat areas. Field studies to determine the actual presence of sage-grouse habitat and the potential for mineral resources in these areas are the only way to identify and quantify the scope of the resource conflicts that would result from withdrawing these lands from mineral entry. The EIS document for Nevada must discuss and quantify the adverse effect on companies, rural mining communities, and the economy of Nevada of the proposed mineral withdrawals. The EIS document must also present alternatives that minimize these impacts and assess the cumulative impacts associated with landscape-scale land use restrictions and mineral withdrawals.	NVCA	Both	emc0327GB
235.	Given this risk, the EIS documents must quantify how the proposed withdrawals would interfere with the investments that NVMRA members and other similarly-situated companies have projects on lands that may be withdrawn, and evaluate ways to minimize jeopardizing investment-backed expectations of claim owners on lands proposed for withdrawal. This analysis should also disclose and quantify the potential impact to U.S. taxpayers from the regulatory takings claims that could arise in response to implementing the land use restrictions and withdrawals recommended in the NTT Report at projects where these measures will interfere with substantial investments.	NVCA	Both	emc0327GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
236.	Secondly, the grass-roots exploration conducted by NVMRA member companies and other Nevada exploration companies in areas that have significant mineral potential as well as sage-grouse habitat is critical to the future of mining in Nevada. Mineral exploration represents the entrepreneurial, Research & Development (R&D) arm of mining. Mineral exploration today discovers tomorrow's mines. Thus, the mineral deposits that are being explored throughout Nevada - including deposits that are within the gold trends and sage-grouse habitat areas shown on the attached map - are essential to creating and maintaining a robust pipeline of projects that can become future projects that create high-paying jobs, generate revenue for state and local governments, and help meet the Nation's needs for domestic minerals. NVMRA member companies, other small mineral exploration companies and individuals conduct much of this exploration work.	NVCA	Both	emc0327GB
237.	Withdrawing all or some of the lands where Nevada's mineral deposits and gold trends are located from mineral entry will have a devastating effect on Nevada's mining future. Withdrawing these lands from mineral entry would put some of the best mineral exploration terrain in the world off-limits to exploration and development. This will dramatically diminish the odds of making discoveries of valuable mineral deposits that can ultimately become a mine. This will stifle job creation and impede Nevada's economic recovery. Increasing the Nation's reliance on foreign sources of minerals also threatens our national security.	NVCA	Both	emc0327GB
238.	The EIS documents must attempt to quantify the socioeconomic impacts of the lost discovery opportunities that would result from withdrawing lands with known world-class mineral deposits in highly prospective gold trends in areas where geologists continue to explore for and find new deposits. This analysis should compare and contrast the impacts associated with the No Action Alternative, the Proposed Action, the Agency Preferred Alternative, and Alternatives Considered in Detail. The NVMRA strongly encourages BLM and USFS to select an Agency Preferred Alternative that does not ruin Nevada's mineral economy by placing a significant portion of Nevada's mineralized lands off-limits to exploration and development.	NVCA	Both	emc0327GB
239.	Much of Nevada has struggled for the last several years to meet the challenges of the prolonged economic downturn and record unemployment rates. However, in rural mining counties, mining has kept unemployment well below the double-digit rates that have plagued the rest of the state. The State cannot afford to lose mining as the principal economic engine in these rural mining counties where sage-grouse habitat is also located.	NVCA	Both	emc0327GB
240.	The health and safety of the greater sage-grouse population is an issue that gravely concerns the agriculture industry. As agriculture is the longest standing and third largest industry in Nevada, we in the industry feel that an in-depth analysis of the social economic impacts not only to rural communities but to the State of Nevada as a whole needs to be completed alongside the NEPA analysis of the environmental impacts. The livestock industry of Nevada works hard to create environmentally stable as well as economically viable operations and one such contributing component is the ability to graze on private and public land. The Association strongly urges the deciding entities, the federal agencies, to consider a conservation strategy that feasibly allows ranching operations to continue to be economically stable. Being that the Bureau of Land Management (BLM) is comprised of specialists relating to each natural resource field, we encourage the BLM to seek further assistance in assessing the social economic impacts to Nevada, from specialists in business and economics' fields. As clarified in the Endangered Species Act (ESA), "The 1978 amendments oblige the Secretary to consider the economic impact of designating critical habitat" and the Association requests that this part of the assessment be	NVCA	Both	emc0328GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	thoroughly reviewed. Also stated in 76 FR 77008-77011, "the BLM and FS will address socioeconomic impacts of the alternatives," we strongly support this statement and urge these agencies to explore all methods of analysis. As the BLM is a multiple use agency and the Association strongly supports this method of management, we suggest this analysis of the social economic impacts should include not only the agriculture and livestock industries but also, mining, oil and gas developments, and other multiple-use industries. The stability of the State of Nevada's economy should be just as important of a component in the conservation strategy as the environmental analysis. The Association also believes that coordination with local and state governments is imperative for this effort alongside state and federal agencies. 76 FR 77008-77011 states, "The BLM and FS will coordinate and communicate with State, local and tribal governments to ensure that the BLM and FS consider provisions of pertinent plans, seek to resolve inconsistencies between State, local and tribal plans, and provide ample opportunities for State, local and tribal governments to comment on the development of amendments or revisions." The Association strongly encourages the federal agencies to coordinate and communicate with said governments throughout the development of the amendments or revisions to the federal land use plans and ensure that these plans are consistent with existing land use plans of local governments.			
241.	A balanced approach to public land management is especially important to states like Nevada with valuable mineral resources and to companies like Eureka Moly that have made substantial investments in developing valuable mineral deposits. Because the location of mineral resources is determined by geology; mineral deposits can only be developed where they are found. Consequently, the withdrawal of mineral areas with high-priority sage-grouse habitat would result in significant economic harm to the State of Nevada and any company whose mineral deposit is located in a high-priority habitat area.	NVCA	Both	emc0335GB
242.	I am a livestock producer based in the state of Nevada. Livestock grazing is a legal and valid use of public rangelands and is a vital component of my livelihood.	NVCA	Both	flj0000GB
243.	Our ranching operation is highly dependent on the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of our ranching operation.	NVCA	Both	rmc0065GB
244.	SNWA respectfully requests that the EIS consider and discuss the following: fully evaluate the economic impact of additional or revised sage grouse measures on grazing, power, and the water industry.	NVCA	Both	rmc0069GB
245.	ODOT is concemed that the social-economic issues may not be adequately considered when this land management plan and guidance is developed, and for how this plan is then subsequently implement by the Districts for federal lands in Oregon. With all of the competing interest and the obvious focus for the long term stability of the greater sage-grouse numbers and desired increase in suitable or rehabilitated habitat, it would be very easy to develop a plan that is out of balance between the variety of beneficial land use categories by discounting the importance of the social-economic issues.	OR	Both	emc0155GB
246.	Grazing is essential to the economic sustainability of OSGA members and the communities of which they are a part. The benefits that grazing provides to the economy include not only direct economic impacts, but also the economic multiplier effects that result from livestock production. As the agency proceeds to study this issue and consider the potential economic impacts of various regulatory actions, OSGA encourages the agency to take into account the adverse effect that certain regulatory actions may have on the economic multiplier effect that results from grazing dependent livestock	OR	Both	emc0309GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	production.			
247.	In summary, the best available scientific evidence shows that public grazing is important for sage-grouse conservation. In addition, public grazing maintains the economic sustainability of livestock producers and provides substantial economic benefits to the communities in which they live and the economy of Oregon as a whole. In turn, by maintaining the economic sustainability of livestock producers, public grazing protects sage-grouse habitat by reducing the need for ranchers to sell or develop their private property in a manner that is detrimental to sage-grouse habitat.	OR	Both	emc0309GB
248.	On behalfofthe Oregon Cattlemen's Association's Public Lands Committee, we are extremely concerned that the proposed amendments to incorporate measures for sage-grouse conservation into land use plans could have a damaging impact on rural communities, businesses, families, the environment in Oregon.	OR	Both	emc0315GB
249.	Economically viable ranching operations provide both stewardship of public lands and economic vitality to local and regional communities. The continuation of livestock production on Oregon's public lands is extremely important, not only for the sustainable production of food and fiber for the United States and worldwide markets, but also for the long-term success of sage-grouse conservation.	OR	Both	emc0315GB
250.	The ODFW EIS needs to identify and analyze all potential socio-economic impacts related to Private Industries and Public Works projects which now require permits that are developed in consultations with the ODFW through the Environmental Assessment (EA) or EIS processes. Examples include the Mining Industry and large scale public works and improvements that rely on Federal Mineral and Rock materials for completion (ie. Development of New Irrigation Canals or Water Improvements).	OR	Both	rmc0036GB
251.	The socio-economic Profile provided in the ODFW EIS is wholly inadequate to provide any basis for comprehensive analysis of potential effects of this Mitigation Plan. As a consequence, any analysis and conclusions drawn from it in its current form will be misleading.	OR	Both	rmc0036GB
252.	1. Major Economic activities within the "Region of Sage Grouse Strategy", in addition to the three activities already stated in the EIS; must include Mining and Recreation. Recreation in the form of Hunting, Fishing, and Wildlife Viewing are touched upon, but must be expanded to include all other types of recreation that people participate in throughout the year.	OR	Both	rmc0036GB
253.	The EIS list of Socio-economic Factors should be expanded to include: - Ranching - Recreation - Mining - Renewable Energy	OR	Both	rmc0036GB
254.	2. The EIS should examine employment statistics available on-line at the Oregon Department of Revenue and Employment jDivision to expand the scope of analysis to potential effects of this Mitigation Plan on employment in in these four sectors in the 8 county region of eastern Oregon.	OR	Both	rmc0036GB
255.	The EIS analysis should examine potential impacts of mine permitting and Seasonal Closures on the Recreation industry; both in relation to the regional economy and long term employment.	OR	Both	rmc0036GB
256.	The ODFW EIS needs to identify and analyze all potential socio-economic impacts related to Private Industries and Public Works projects which now require permits that are developed in consultations with the ODFW through the Environmental Assessment (EA) or EIS processes. Examples include the Mining Industry and large scale public works and	OR	Both	rmc0036GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	improvements that rely on Federal Mineral and Rock materials for completion (ie. Development of New Irrigation Canals or Water Improvements).			
257.	The presentation of Ranching, on page 202 and 3 is difficult to read and crams too much information together in a large run-on paragraph. The EIS should present all data in a clear and understandable manner. This section needs revision for clarity.	OR	Both	rmc0036GB
258.	The estimate of value of travel generated and local recreation expenditures by Dean Bunyan and Associates in Table I mayor may not include all types of recreation. But it does show in part the value of the regional recreation industry.	OR	Both	rmc0036GB
259.	In the Renewable Energy Section ofAppendix VI, the EIS cites a Northwest Economic Associates, 2003 study of wind farms economic impacts. More current information is available on the negative impacts from the northeast Oregon wind farms in Baker Co.	OR	Both	rmc0036GB
260.	The Calico Grassy Mountain Project will be a small underground mine. It will create up to 150 badly needed jobs during construction, and possibly as many as 100 permanent full-time jobs during operations. These are high-paying, year-round positions which will be comparable in pay to similar jobs in nearby Nevada (Dobra, 2011), which average nearly $85,OOO/year. We believe that conservation measures guided by an implementation strategy involving land owners, other land developers and local land managers is the appropriate approach to guiding future responsible land management policy and regulation in the western U.S. This should be the "guiding light" going forward.	OR	Both	rmc0074GB
261.	Many of Kingston's citizens rely on using public lands to provide an income for their families and most of Kingston's citizens use public lands for recreation and hunting. Our right to use these lands is continually being challenged. Most of those wanting to limit public use of these lands are not concerned about the impact on the local population and they find any issue they can to drive their agenda.	UT	Both	emc0176GB
262.	The district believes future listing of this species would ultimately be a major detriment to continuing voluntary incentive based conservation projects, planning and the local economy. Farmers and ranchers in Southern Utah rely heavily on maintaining federal grazing allotments to sustain their livestock operations and livelihoods in the district's local communities.	UT	Both	emc0178GB
263.	BLM is required, under the provisions of the National Environmental Policy Act, to analyze the effects of its proposals on the social and economic infrastructure within Utah. BLM must, therefore, as part of the social and economic impact portion of the EIS, analyze the impact of each of the alternatives upon the cooperative structure for the protection of sage grouse found in Utah.	UT	Both	emc0337GB
264.	Sage grouse habitat is naturally fragmented by the natural topography and conditions ofthe sagebrush environment in Utah, and has been further altered by human needs and activities. Given these facts, the BLM must consider, analyze, and provide evidence of the BLM's capability to contribute to the needs of the species, especially with reference to the other multiple-use requirements of the BLM which significantly contribute to the economy of Utah and the nation	UT	Both	emc0337GB
265.	The Notice ofIntent indicates that the BLM will be conducting an analysis of the social and economic impacts of the alternatives within the EIS, and that this analysis will employ one of several computer programs, such as IMPLAN, which can calculate dollar values for direct and indirect economic effects. The state is very familiar with these programs, using them itselffor various economic calculations. The primary issue with such calculations is to insure that the input data is as	UT	Both	emc0337GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	realistic and accurate as possible, in order to produce meaningful results. The state requests the opportunity to be an active partner in the process to review and select the input data for these calculations.			
266.	Livestock production tied directly to access and use of the federal lands is the backbone of Utah's agriculture Industry, contributing more than 65 percent of our state's $1.5 billion in farm gate sales. This contribution and its economic ripple effect are significant to the state of Utah and of critical importance to rural communities. It has been estimated that more than 70 percent of Utah's cattle and sheep utilize the public lands for some portion of the grazing year. Sustainable grazing practices, harvesting renewable forage, provides value to all Americans, enhances rangeland resources and controls dead grass and brush helping control deadly Wildfires.	UT	Both	rmc0003GB
267.	Agriculture is important to all Utahns, not only because we all eat, but because of its economic impact. Utah State University recently released an economic study related to the contribution of food and agriculture industry. Farming and ranching is the foundation to nearly $15 billion in economic activity, 70,000 jobs and contributes as much as 14 percent of the Gross State Product.	UT	Both	rmc0003GB
268.	Resource Management Plans - The agencies, state and local governments as well as affected parties participated in the previous RMP process. Long term plans are in place related to these RMPs that major decisions and investments have been made in community infrastructure, job growth, education funding, grazing and other multiple use activities.	UT	Both	rmc0003GB
269.	More than 90% of the land in Garfield County is under federal ownership, and less than 5% of the land in Garfield County is in private ownership. Garfield County requests a detailed social, cultural and economic analysis including custom, culture, land uses, economic viability, impacts to human populations, impacts to school populations, environmental justice considerations to Garfield County's low income population, and impacts to the health and well-being of Garfield County visitors and residents be considered in the plan. Garfield County specifically requests that this analysis conform to Data Quality Act guidelines and is not a general over simplification attributed to professional opinion.	UT	Both	rmc0006GB
270.	More than 90% of the land in Garfield County is under federal ownership, and less than 5% of the land in Garfield County is in private ownership. Garfield County requests a detailed social, cultural and economic analysis including custom, culture, land uses, economic viability, impacts to human populations, impacts to school populations, environmental justice considerations to Garfield County's low income population, and impacts to the health and well-being of Garfield County visitors and residents be considered in the plan. Garfield County specifically requests that this analysis conform to Data Quality Act guidelines and is not a general over simplification attributed to professional opinion.	UT	Both	rmc0006GB
271.	A considerable portion of the economy of Manti City is dependent on agricultural endeavors. The farmers and ranchers in Manti rely on the forest as well as BLM lands for grazing if they are to remain a viable part of our local economy. In the course of developing a plan we certainly encourage the idea of a cooperative management strategy that would account for those farmers and ranchers use grazing permits in the study areas.	UT	Both	rmc0045GB
272.	The Aquarius Plateau includes Wayne and parts of Piute and Garfield counties. 97 per cent of the land is owned by the Federal Government. Statistical report from the Governor Herbert's office shows that agriculture contributes 87 percent of the county's revenue, any change in grazing would be devastating to the economy of Wayne county.	UT	Both	rmc0062gb
273.	Agriculture on and around Wayne and Piute Counties has been identified as the number one supplier of earned income and source of new dollars generated by the multiplier impact. Efforts of the PARM group have led to significant increases	UT	Both	rmc0066GB

Table C-10.A
Comments Related to Socioeconomics

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	in grouse inventories and habitat improvement without handicapping livestock production and the local economy.			
274.	Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Impacts on this economic activity need to be included in the study. We urge BLM and FS officials to coordinate with the Department of Agricultural and Applied Economics located in the University of Wyoming, College of Agriculture. They have conducted several studies about the impact of policy upon agriculture throughout the state. The studies include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. These EISs/SEISs will directly affect the continuation of livestock grazing and other agricultural operations on federal and private lands within and adjacent to the planning area and these evaluations of economic impacts upon agriculture need to be included.	WY	Both	rmc0010RM
275.	Secondly, I question strongly the notion that AUM cuts on grazing allotments will have any effect. If grazing is truly a factor, why were sage grouse so plentiful from the 1950's through the 1970's? This is a time frame when, typically, turnout dates were earlier and grazing allotments were not near so closely monitored, further, stubble height should not be used as a benchmark for sage grouse habitat, adjacent to leks. Soil type, in this instance is critical I am familiar with two leks in our area (on private land) that are located on white hardpan, which would never have sufficient srubble height on an exceptional year. Stubble height requirements, in my view, could be used in an arbitrary and capricious way to force AUM cuts, without any corresponding benefit to sage grouse populations.	WY	Both	rmc0012RM, rmc0022RM
276.	further con'ideration 'hould be made for Ih",e families thathve and work w,thin the area of the IBNG. There a,e many ranche, that coexist with National Forest administered lands, Several I ea~e land, for Ihei. ope,ations. Ihose that use TBNG to travel upon or over to reach either their own priv~te properties Or Ihe!' allotments should not be rest.lcted beyond 'e~,onable 10 continue their da,ly activ,tie, for survival Every possoble care and consideration for normal act,vity is necessary to secure the su.vival of OUr <peeies as well. Members of the ranching community are the most considerate and cooper alive individuals and should be treated with respect as their respect for animal. ~nd wildl ife is forefront to them al,o.	WY	Both	rmc0043RM

Table C-10.B
Comments Related to Tribal Interests and Native American Religious Concerns

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	The BLM has a trust responsibility to treaty tribes which includes protection of culturally important species such as sage grouse and sharptail grouse. The BLM can do this by not allowing any wind turbines to be built within five miles of any sage grouse and sharptail leks.	All	Both	emc0009RM
2.	Disregarding this decision, the Bureau of Land Management has proceeded to transfer land to extractive industries and energy developers with little regard for Shoshone culture, spiritual/religious rights, gathering rights, or concern for the plants and wildlife upon which they depend, including the sage grouse and its habitat	All	Both	emc0170GB
3.	Illegal hunting must be controlled more effectively. In at least one case I am aware of, many years ago, a population of sage grouse was virtually exterminated by local indians exercising their "indigenous rights" to hunt out of season. They continued hunting the population off season until there was no longer a viable breeding population left. State fish and game departments are generally to afraid of the back lash to enforce hunting regulations for indians. This deplorable situation must be stopped. Indigenous rights should be limited to historical hunting techniques, and not allow the use of high power rifles and shotguns out of normally set hunting season. Sage grouse habitat should be monitored more closely for illegal hunting, especially during the non-hunting season when much of the poaching takes place.	All	Both	emc0200GB
4.	The greater sage-grouse is culturally significant to tribes, many of which have traditional ceremonies, treaty rights, and conservation activities associated with the bird. Thus, tribes have a stake in the national sage-grouse planning strategy. Tribes care deeply about the preservation of this iconic species and portions of the species' historic and current range cover tribal lands. It is vital that the federal government conduct effective government-to-government consultation with the tribes and encourage tribal members to actively engage in this planning process.	All	Both	emc0329GB
5.	We support full Tribal consultation, which involves much more than BLM's mailing letters to Tribal Chairs and holding a meeting or two. BLM should use this process to implement much more stringent requirements for itself during consultation processes Westwide. One concern: BLM states this will occur "within greater sage-grouse habitats." But what about the areas BLM - arbitrarily - doesn't even give any status to? Like significant areas of Idaho that only a few years ago were sage-grouse habitats, and now are dropped altogether from BLM mapping and that should be identified for restoration, or that provide critical habitat during hard winters, or that will be essential to provide connectivity?	All	Both	emc0411GB
6.	The declining conservation status of the greater sage-grouse is of great concern to me, particularly since it is important culturally to many of our Indigenus Nations, including my own, the Lakhota.	All	Both	fld0009rm, fld0009gb
7.	Tribal and Cultural Resources The BLM's NOI states that, "The BLM and FS will consult with Indian tribes to identify sites, areas, and objects important to their cultural and religious heritage within greater sage-grouse habitats." We support this approach. For clarity and to ensure consistency with Executive Order 13175, we recommend that the EIS present information about the consultations according to the phases of the consultation process: identification, notification, input, and, follow-up. We have found this approach to be useful as we consider consultation for the EPA's actions. For more detail, see "EPA Policy on Consultation and Coordination with Indian Tribes."9	All	Both	rmc0020RM
8.	I am an archaeologist doing research on the prehistoric significance of the Sage-grouse to Indigenous peoples of Western Colorado. I have evidence that "traditional sage-grouse habitat" has been in existance for thousands of years unchanged. The BLM has worked hard to conserve the sage-grouse habitat and that's how it should be, for not only future generations to observe and study, but as part of a Native cultural tradition for generations to come. It was an important food source and	CO	Both	flm0003RM

Table C-10.B
Comments Related to Tribal Interests and Native American Religious Concerns

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	played a role in myths and inspiration for ceremonial dances. The greater sage-grouse is an important part of the web of life in sagebrush country. Future generations should have the opportunity to visit natural areas and see the fascinating mating dance of the sage-grouse.			
9.	These beautiful birds need to be protected, or soon they will no longer exist at the rate they are declining. Sage-Grouse are very important to Yomba's Native American culture. Because these birds are such an important part of Yomba Shoshone's culture, they would like to be consulted and informed on any and all issues that are being addressed.	NVCA	Both	emc0104GB

Table C-11.A
Comments Related to Lands and Realty on Public Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Make sure all federal lands are included in the conservation plan. Use the best available conservation biology science.	All	Both	cfc0015
2.	The fight over the grouse is about more than a bird. It symbolizes a larger dispute over the future of the West and the region's vast network of public land. Many expect the bird to touch off an ecological battle not seen since the feud over the northern spotted owl in the 1990s that ended up devastating the timber industry in the Pacific Northwest.	All	Both	cfc0017GB
3.	Areas with fewer populations on gov't ground could be blamed upon: ground not as fertile/productive, heavier population of weeds, more predators, where wild horses overgrazed, too heavy of population of sage so not healthy ecosystem.	All	Both	cfc0031GB
4.	Let us protect the leks, control the predators and actually manage the land, not lock the area up and call that good management!	All	Both	cfc0035GB
5.	I feel multiple use of federal lands benefit the entire community.	All	Both	cfc0060GB
6.	On behalf of the residents of oneida county we go on record of maintaining the current status of the BLm and Forest Service land that now has multiple use in place.	All	Both	cfc0061GB
7.	In a recent book edited by S. T. Knick and J. W Conmelly on Sage-Grouse research it was stated that most attempts to restore sagebrush habitats have been unsuccessful. In fact a noted grouse expert, Dr. Clait E. Braun, stated, "I know of no areas where Sage-Grouse have re-established their distribution over significant areas of former habitat," (The Wilson Journal of Ornithology, Vol. 123, p 655). What this effort will require will be for you to put Sage-Grouse management above all other uses on public lands. This means that grazing of livestock and fences should be eliminated in core Sage-Grouse areas. All types of land fragmentation, such as roads, power lines, wind farms, oil and gas drilling, etc. will have to be secondary to the management of Sage-Grouse. I do not have much faith that your agencies will be capable of such a drastic turn-around. In fact, BLM planned to study ecological trends in much of the 260 million acre of the West's grazing allotments, but told the scientists not to consider livestock grazing, due to "anxiety from stakeholders." Such attitudes will absolutely have to change if there is any hope to save Sage-Grouse and their habitat. The only real solution that I see is buying out willing ranchers who graze in core Sage-Grouse areas. As said, both your agencies will have to put the grouse first.	All	Both	emc0021RM
8.	IThe EIS must identify and evaluate the impacts of any and all proposed land use management practices to be imposed on all public lands users. Such practices must be feasible, practical and cost effective to all users.	All	Both	emc0031GB
9.	This is nothing more than a "land grab" by small groups that simply do not want people on public lands. They want use of public lands on their terms only. They represent a small minority. If the real issue is the Sage Grouse, let's set up hatcheries in every effected state and breed Sage Grouse.	All	Both	emc0035GB
10.	In my view, many of the efforts to protect sage grouse is simply motivated to stop resource development on our public lands. Sage grouse habitat is very extensive across the West. As a result, environmental groups are using the sage grouse as a vehicle to stop most oil, gas, and mineral development - and force their agendas on the rest of us.	All	Both	emc0054RM
11.	Sage-grouse, pygmy rabbits and the full suite of sage obligate flora and fauna will make their last stand on the national public lands. State lands will continue to be largely managed for maximum return to state coffers by law.	All	Both	emc0058GB
12.	If healthy, robust populations of sage species are to be retained, national public lands must be managed as though they will be the only areas of sage habitat remaining large enough to matter. In many areas they already are that, and in all likelihood that will become more and more the case in the future. This means managing sage habitat for native species must become the	All	Both	emc0058GB

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	dominant paradigm on national lands.			
13.	What remains of good or restorable native habitat on our national lands must be managed for their intrinsic values first and foremost and uses which detract from that objective must be phased out.	All	Both	emc0058GB
14.	As one drives through the millions of acres of open space in the west, you wonder who takes care of all this land. It is neither the government nor the environmental community; it is the rancher whose house is out of the wind and out of site. The west does not have another management option. Be careful of what you regulate as a result of this scoping process.	All	Both	emc0070GB
15.	How will the BLM coordinate the different County Comprehensive Land Use Plans into the EIS? Understanding that each county is required by state law to have its own plan and that being designed locally means all are unique to a respective county.	All	Both	emc0071GB
16.	With regards to roads around both priority and general Greater Sage Grouse habitats, no new roads or ROW's should be allowed or granted within a 5.5 mile radius of a lek site. With regards to priority habitats, the BLM should further include mandatory limited and or no usage of such roads that pass within a 5.5 mile radius of a lek site during mating and hatching seasons.	All	BLM	emc0074RM
17.	The majority ofour member companies are reliant upon public lands and their associated federal management in order to conduct their operations.	All	Both	emc0077GB
18.	The EIS should address how BLM plans to honor the valid existing rights companies hold within what is assumed will be designated Priority Habitat Areas.	All	Both	emc0103GB
19.	The conservation measures in the "A Report on National Greater Sage-Grouse Conservation Measures" take the approach that typical uses of public lands negatively impact the sage grouse and immediately seek to limit or withdraw public use as a means of conservation. These are stipulations, not conservation measures. This approach should be changed to fully analyze all potential proposed actions. A matrix should be developed identifying the issues associated with various typical components of each type of proposed action and delineate a full range of alternatives and mitigation measures in different levels of habitat.	All	Both	emc0103GB
20.	There are at least several places in BLM's materials that say the conservation measures would be applied regardless of surface ownership. For example, in the December 27, 2011 BLM press release: "human-caused disturbance in priority habitat would be limited to less than 2.5% of the species' total habitat, regardless of surface ownership". The EIS should address only the management of public lands.	All	Both	emc0103GB
21.	When revising the existing RMPs, the BLM must also acknowledge existing rights, including oil and gas lease rights. Once the BLM has issued a federal oil and gas lease without no surface occupancy stipulations, and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold. See, e.g., National Wildlife Federation, et al., 150 IBLA 385, 403 (1999). Only Congress has the right to completely prohibit development once a lease has been issued. Western Colorado Congress, 130 IBLA 244, 248 (1994). Further, the BLM cannot adjust Devon's valid and existing rights. Congress made it dear when it enacted FLPMA that nothing therein, or in the land use plans developed thereunder, was intended to terminate, modify, or alter any valid or existing property rights. See 43 U.S.C. § 1701 (2006). In order to effectuate this purpose, the BLM promulgated policies regarding the contractual rights	All	BLM	emc0116GB

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	granted in an oil and gas lease. BLM Instruction Memorandum 92-67 states that U[t]he lease contract conveys certain rights which must be honored through its term, regardless of the age of the lease, a change in surface management conditions, or the availability of new data or information. The contract was validly entered based upon the environmental standards and information current at the time of the lease issuance." As noted in the BLM's Instruction Memorandum, which is binding upon the agency, the lease constitutes a contract between the federal government and the lessee which cannot be unilaterally altered or modified by the BLM.			
22.	Because, the authority conferred in FIPMA is expressly made subject to valid existing rights, 43 U.S.C. § 1701, an RMP prepared pursuant to FIPMA, after lease execution and after drilling and production has commenced, is likewise subject to existing rights. See Colorado Environmental Coal, et 01., 165 IBLA 221, 228 (2005). The RMPs, when revised, cannot defeat or materially restrain Devon's valid and existing rights to develop its leases through conditions of approval or other means. See Colorado Environmental Coal, et al., 165 IBLA 221, 228 (2005) (citing Colorado Environmental Coal., 135 ISLA 356, 360 (1996) aff'd, Colorado Environmental Coal. V. Bureau of Land Management, 932 F.Supp. 1247 (D.Colo. 1996).	All	BLM	emc0116GB
23.	BLM recognized the need to address mixed estate ownership in its December 2011, "Report on National Greater-Sage Grouse Conservation Measures" (Report). That Report proposes exceptions to closing leasing in mixed ownership lands containing priority habitats specifically in cases where land ownership is inconsistent section-by-section resulting in a "checkerboard" ownership pattern. Anadarko owns mineral and surface use interests in such checkerboard areas. Anadarko therefore recommends that in areas of mixed ownership reasonable exceptions are provided to conservation measures.	All	Both	emc0125RM
24.	Recognition of the challenging resource management aspect of mixed ownership is also stated in BLM's document Winning Challenges o/the Future -A Road Map to Success in 2016 (BLM 2010). BLM notes: "Our checkerboard landscape and management of the subsurface mineral estate that is sometimes located under different surface owners has integrated managing and mitigating necessary impacts and, ultimately, good communication into everything we do." The document continues: "Mitigation measures will need to be coordinated based on resource impacts, rather than land ownership." Consistent with the above tenets, Anadarko requests that BLM not limit our company to only providing scoping or NEP A document comments, but more fully engage mineral owners in these proposed land management changes. As the planning process progresses, a productive on-going dialogue with the mineral and surface use owners on the checkerboard lands is essential.	All	Both	emc0125RM
25.	So I guess what we ask as residents of Clark County, and as land owners of sage property in Clark County, and as users of public lands in Clark County, is To Whom it May Concern We would like to comment on the Greater Sage Grouse Planning Strategy that you work with us in the County to find plans that will allow us to continue to live and take care of the land here, including it's other residents the animals. We all are conservationists in one-way or another, or we wouldn't still be here on the land. The Indians proved this by burning off areas every so many years to provide fresh food for the game that they needed to survive. We too need to survive.	All	Both	emc0128GB
26.	The County supports the continued access to public lands and maintenance of valid multiple uses. We would ask that a local workshop be held with inclusion of our Commission, local NDOW representatives and BLM District / Field Office to review, discuss and cooperate on designation of priority habitat within Lincoln County.	All	Both	emc0130GB

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27.	Impacts to sage grouse should have been analyzed in all National Environmental Policy Act (NEPA) documents required for every right-of-way (ROW) permit on BLM land. Requiring additional review for previously authorized ROWs requiring amendment or renewal places undue burden and expense on the permit holder and can significantly and adversely impact current operations, such as mining, grazing, recreation, etc. and the communities that support those activities.	All	Both	emc0147GB
28.	The statement, "Unless the BLM determines, in coordination with the respective state wildlife agency, that the proposed ROW and mitigation measures would cumulatively maintain or enhance Greater Sage-Grouse habitat, the proposed ROW decision must be forwarded to the appropriate BLM State Director, State Wildlife Agency Director, and FWS representative for their review," implies ROW applications will be approved or denied based on impacts to sage grouse alone. ROW applications must take into account beneficial as well as detrimental socio-economic impacts, biological impacts, visual impacts, etc. A balanced approach is the goal of NEPA review. Also, moving the decision point reduces the authority of the field offices and consideration of local issues.	All	Both	emc0147GB
29.	Another consideration you must make is with land tenure. With the various ages of your land use plans and various land tenure priorities, you need to decide if it is going to be a priority to acquire or protect sage grouse habitat via sale, exchanges or easements. If it is, the process needs to be fixed to be accomplished in a cheaper, easier and faster way for sage grouse and their habitat. At least one alternative needs to address this issue.	All	Both	emc0149GB
30.	ODOT recognizes that this BLM / USFS plan is likely not going to be highly detailed or specific. Rather it is likely intended to provide broad over arching guidance that the individual Districts will utilize when they craft or modify District level management plans. Many of the issues of concern that ODOT has related to transportation facilities and sources of material located on federal land are likely to be similar in other Western States paliicipating in this planning effort. The following recommendations are not Oregon specific and would seemingly be appropriate for this larger planning effort. ODOT recommends that through this higher level planning effort: Guidance to the Districts is developed stating that in all District level planning efforts existing federal, state and local transportation facilities, rights-of-ways and serialized federal material sites within the planning area need to be clearly identified and documented in their management plans	All	Both	emc0155GB
31.	ODOT recognizes that this BLM / USFS plan is likely not going to be highly detailed or specific. Rather it is likely intended to provide broad over arching guidance that the individual Districts will utilize when they craft or modify District level management plans. Many of the issues of concern that ODOT has related to transportation facilities and sources of material located on federal land are likely to be similar in other Western States paliicipating in this planning effort. The following recommendations are not Oregon specific and would seemingly be appropriate for this larger planning effort. ODOT recommends that through this higher level planning effort: Guidance is developed that the Districts can implement that provides exceptions or buffers for existing rights-of-way or easements to allow for the continued and unimpeded use of these lands for transportation related purposes. Highway related activities within existing rights-of-way should be exempted from added scrutiny based on greater sage-grouse habitat.	All	Both	emc0155GB
32.	ODOT recognizes that this BLM / USFS plan is likely not going to be highly detailed or specific. Rather it is likely intended to provide broad over arching guidance that the individual Districts will utilize when they craft or modify District level management plans. Many of the issues of concern that ODOT has related to transportation facilities and sources of material located on federal land are likely to be similar in other Western States paliicipating in this planning effort. The following	All	Both	emc0155GB

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	recommendations are not Oregon specific and would seemingly be appropriate for this larger planning effort. ODOT recommends that through this higher level planning effort: Guidance is developed for the Districts, out lining an expedited process for gaining necessary approvals if the identified projects (highway or material sources) will impact greater sage-grouse habitat outside existing highway or material site rights-of-way.			
33.	ODOT wants to reiterate that we support and recognizes the importance and value in environmental review of projects to assure that issues such as greater sage-grouse habitat is identified, evaluated and, if necessary, mitigated. But for projects that are necessary to maintain a safe and efficient transportation system, there needs to be processes in place to allow for project specific evaluation and approval without always requiring an RMP amendment via an EA or EIS. Greater sage-grouse and their habitats are important, but in addressing transportation improvement or maintenance projects or materials needed for these projects, it should not take years of effort and hundreds or thousands of dollars to obtain approvals to move forward. By developing the above mentioned recommendations, it should allow individual BLM Districts across the west to implement land management strategies for improved greater sage-grouse habitat without having to struggle to address Federal, State and Local Transportation projects and needed material sources.	All	Both	emc0155GB
34.	Please allow the people that love this country to continue to enjoying it, don't close us out of the areas we enjoy.	All	Both	emc0175GB
35.	Case in point, the National Greater Sage-Grouse Planning Strategy is designed to categorize Sage-Grouse as a species requiring government intervention to ensure their survival. When this designation occurs, here comes the regulation and there goes public land use and access.	All	Both	emc0176GB
36.	I am opposed to any use of this issue to close more public lands to access or development.	All	Both	emc0177GB
37.	I would like to add my comments regarding the Great Basin Region - National Greater Sage-Grouse Planning Strategy. I appreciate the need to protect our lands through resource management plans, but I believe the plans tend to side on the environmentalist side and not on the users of the land such as I. I am a senior (over 55 years) ATV rider and I appreciate the ability to see our land with ease, but I do not damage our lands. When I hear the goal is to protect sage-grouse, I believe this means closures to lands I want to visit. Please do not take the sage-grouse to the point that existing ATV trails are closed.	All	Both	emc0182GB
38.	It is necessary to remove as much critical habitat as possible from development. This means both buying out some leases and trading others in critical habitat for those in less important areas. Clearly, some areas are simply not appropriate for development.	All	Both	EMC0185RM
39.	I don't feel there is any reason to close public land to the public. The is no reason the sage grouse and humans can't use the same area.	All	Both	emc0188GB
40.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the econoimic viability of ranching operations.	All	Both	emc0202GB
41.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations. Wildlife populations including Greater sagegrouse benefit from the productivity of these private lands.	All	Both	emc0215GB

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42.	Public lands (especially BLM property) should be managed for multiple uses. Traditional uses should get priority over newer uses such as ATV trails and wilderness designation. National Parks and National Forests should be managed for fewer activities and can be set aside for Wilderness designation.	All	Both	emc0217GB
43.	Because hunting and ranching are the traditional use of most of the public land, management should be tailored for these 2 activities but other activities should be included as long as hunting and ranching is not affected.	All	Both	emc0217GB
44.	Every effort should be made to consolidate public lands and reduce the checkerboard situation caused by the railroad. Isolated parcels that have no public access should also be reduced. Efforts should be made to trade or sell BLM controlled property that is isolated and mixed with private property.	All	Both	emc0217GB
45.	Any proceeds made from the sale of public land, should be used to purchase land and expand our existing National Parks and Forests which will provide larger buffer areas for future development.	All	Both	emc0217GB
46.	Most BLM land does not need to be included as Wilderness designation but it does need to be protected to prevent illegal activities from happening. If the BLM is going to maintain management of these lands, then they need to increase enforcement of existing laws and regulations. Without increased enforcement efforst, sage grouse habitat will continue to be affected.	All	Both	emc0217GB
47.	I am against restricting the use of federal land for the public to use in recreation, logging, mining, ranching, farming and other uses.	All	Both	emc0229GB
48.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Closed to leasing or NSO with no exceptions, modifications or waivers.	All	Both	emc0234GB
49.	BLM should put the following management prescriptions in place for L WCs at a minimum: Closed to leasing or NSO with no exceptions, waivers or modifications;	All	Both	emc0234GB
50.	Page 12, Lands/Realty section indicates that rights-of-way (ROWs) should not be permitted in high priority sage-grouse habitats, with a few exceptions. The socio-economic impact of this conservation measure needs to be analyzed in the EIS. Restricting the new ROWs to be co-located entirely within an existing ROW is too restrictive (page 13, first bullet). The temporary, short-term use of a laydown yard or staging areas that is too large to be co-located entirely within an existing ROW should not be sufficient reason for denying the use of the ROW. However, such short-term temporary use should be followed by reclamation to prevent non-native invasive species from establishing and re-establishing perennial vegetation.	All	Both	emc0239GB
51.	Under the Land Tenure Adjustment section (page 13) the conservation measure calls for retaining "public ownership of priority sage-grouse habitat." We find this offensive as it implies only the government can benefit and manage sage-grouse. The record over the last 60 years in Nevada would not support this implication.	All	Both	emc0239GB
52.	For example, BLM may impose NSO restrictions on active leases or require certain BMPs as Conditions of Approval (COAs) for permits within priority habitats. BLM cannot legally impose new NSO stipulations or COAs on existing leases rights that differ from those entered under the original contractual terms.	All	BLM	emc0246GB
53.	The Report recommends that BLM close priority sage-grouse habitats to future leasing, except in areas that are not entirely federally owned. A decision to discontinue leasing in all preliminary priority habitats (PPH) areas that are not entirely federally owned would unreasonably block access to Significant energy resources on thousands of acres of public lands, potentially force operators to abandon projects outside of PPH areas if they are unable to lease adjacent or nearby parcels	All	Both	emc0246GB

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	within those areas, and deprive state and federal coffers of significant revenue from leasing and the subsequent development of those leases.			
54.	The terms of leases held on public land must be honored and existing rights integrated into the proposed action. Leases are obtained and held through significant expense. The terms of all geothermal and other energy leases specifically provide for exploration and development of resources. This includes access to that property as well as transport of the product from the property. Rights of way and access roads must be considered for each leasehold.	All	Both	emc0254GB
55.	COMMENTS ON Interim conservation Measures and Policies for Preliminary Priority Habitat, No. 2012-043 (IM) As the interim policy and program guidance in the IM: These comments are consistent with and applicable to the strategic suggestions above for the proposed action. Rights-of-Way (ROW) The ROW recommendations proposed in the IM may create significant delays in permitting renewable energy projects. To recycle pending ROW applications for additional alternatives analysis could add months or even years to the development of renewable energy projects. Also, the IM gives Field Offices the ability to defer processing ROW applications until the completion of the LUP process, which has the potential to stall development for up to three years.	All	Both	emc0254GB
56.	COMMENTS ON Interim conservation Measures and Policies for Preliminary Priority Habitat, No. 2012-043 (IM) As the interim policy and program guidance in the IM: These comments are consistent with and applicable to the strategic suggestions above for the proposed action. Authorizations on Existing Leases In the all other Proposed Authorizations section, the IM suggests suspending non-producing leases in instances where mitigation would not adequately protect the integrity of Greater Sage-Grouse habitat. We feel that it is difficult, if not impossible, to determine the adequacy of mitigation for actions which have not yet been fully defined or analyzed through a NEPA process. Suspending such leases would deprive leaseholders of the potential benefits of continuing development without compensating them for the value invested obtaining or exploring the leases.	All	Both	emc0254GB
57.	COMMENTS ON "A Report on National Greater Sage-Grouse Conservation Measures" produced by the Sage-Grouse National Technical :Team (NTT) Rights of Way The NTT Report suggests possibly removing, burying, and modifying existing power lines that are within PPH areas. Burying transmission lines is an extremely costly venture, and may make many projects uneconomical. We feel that this mitigation should only be used in extreme circumstances in which studies indicate that there is very high value in burying such transmission lines in very localized cases, and in exchange for this mitigation, proponents receive high value in other proposed actions within the PMU. For example, a proponent could offer to bury an existing power line segment through high-value PPH as mitigation to a new proposed impact. The mitigation should more than offset the impact of the proposed new development.	All	Both	emc0254GB
58.	The rights of land owners and mining claim owners should be protected to the fullest extent possible as they have existing property and access rights. Inhibiting access will cause unnecessary litigation and I believe such limitation will not improve SG populations.	All	Both	emc0260GB
59.	I would like a section discussing the access rights of private land owners and mining claim owners across BLM lands and what the BLM's view of these rights are and the limitations of the law to restrict access. I want to see specific language guidance on what limitations, if any, the BLM believes it is under in restricting access rights of private property and mining claim owners of preexisting rights of way.	All	Both	emc0262GB

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60.	County governments feel strongly that significant and unwarranted impacts to multiple use of public lands will occur, if the Greater Sage Grouse is listed as a T&E species at this time.	All	Both	emc0265GB
61.	Although previous sections have discussed potential impacts from infrastructure associated with energy development and mining, it is important to highlight that infrastructure by itself poses a serious threat to sage-grouse populations. Such infrastructure may include powerlines, communication towers, railroads, roads, and fences. Most authors note that the most significant impact from infrastructure overall is habitat fragmentation. Fragmentation of sagebrush habitats has been cited as a primary cause of the decline of sage-grouse populations, and documented negative effects may include impacts on lek persistence, lek attendance, winter habitat use, recruitment, yearling annual survival rate, and female nest site choice.	All	Both	emc0276GB
62.	Powerlines, which are common to many of the land uses discussed herein, are a particularly significant barrier to sage-grouse movement. Sage-grouse may avoid areas with powerlines as a result of the electromagnetic fields, and thus the impact from the powerline is greater than its actual footprint. Additionally, powerline construction threatens to spread invasive species and noxious weeds, and additionally can create hunting posts for predators to utilize.	All	Both	emc0276GB
63.	In November 2009, nine federal agencies signed a Memorandum of Understanding seeking to expedite the construction of new transmission lines on federal lands. If these transmission lines cross sage-grouse habitat, sage-grouse will likely be negatively impacted. The Gateway West Transmission Project, for example, will include ten power line segments and is expected to cut across 1,100 miles in southeastern Idaho and northern Wyoming, with approximately 500 miles of powerlines proposed on BLM lands. It is anticipated that this project may significantly impact sage-grouse habitat in those areas.	All	Both	emc0276GB
64.	Communication towers also cause similar negative impacts to sage-grouse. Close to 10,000 new communications towers have been constructed within sage-grouse habitats in recent years. Towers will cause similar effects as those associated with powerlines, especially with regard to habitat fragmentation and sage-grouse avoidance behavior.	All	Both	emc0276GB
65.	A major threat to sage-grouse habitat is direct conversation of sagebrush lands for other land management activities, including perhaps most predominantly conversion for agricultural use. Studies have noted that given the distribution of agricultural activities across the sagebrush range, nearly three quarters of all sagebrush lands once suitable for sage-grouse have been influenced by agricultural activities. Notably, in a study aimed at identifying environmental factors associated with extirpation of sage-grouse, authors noted that areas still occupied by sage-grouse have three times less area in agriculture than extirpated areas. In addition to conversion of sagebrush lands for growing traditional crops, there has been an increased interest in the development of crops for use as biofuels, which could increase the desire to convert land for agricultural use. An increase in land conversion for biofuels is anticipated to negatively impact sage-grouse populations.	All	Both	emc0276GB
66.	Land has also been converted for development across the West. As population increases, development becomes more prominent. The Fish and Wildlife Service predicts, for example, that given the current demographic and economic trends in the Rocky Mountain West, rates or urbanization will continue increasing, resulting in further habitat fragmentation and degradation and decreasing probability of long-term sage-grouse persistence.	All	Both	emc0276GB
67.	Conversion of land for agriculture or development also carries with it indirect effects to sage-grouse. For example, agricultural activities or infrastructure associated with development may open up land and provide corridors or perches for predators. An increase in predators, of course, can lead to a decrease in breeding, nesting, and brood rearing success.	All	Both	emc0276GB

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	Additionally, loss of habitat to agriculture and development may also lead to an increase in human presence, causing stress, mortality (accidental or purposeful), and extirpation. As with many of these land disturbing activities affecting sage-grouse, habitat fragmentation is a serious by-product of all land conversions.			
68.	The agencies should also prohibit conversion of sagebrush habitat to any other use within priority sage-grouse habitat. Direct conversion of land for agriculture, development, and other purposes deprives sage-grouse of habitat necessary to survive. This direct loss of habitat is inevitably seriously harmful to a species already struggling to survive across its current, and already seriously reduced, range. Remaining priority habitat must be protected, as this species can hardly endure further loss. See infra Section III.H for more information on the threats associated with conversion of sage-grouse habitat. Because direct conversion is a real threat when public lands are sold to private interests, we agree with the Technical Team Report's directive to retain public ownership of priority sage-grouse habitat and to seek sand acquire state and private lands where possible to best conserve sage-grouse habitat.	All	Both	emc0276GB
69.	El Paso is regulated by the Department of Transportation (DOT) and the Pipe line and Hazardous Materials Safety Administration (PHMSA) for the conveyance of natural gas. As a result, safely regulations stipulate that El Paso maintain various safety facilities (i.e. block valves) and have access to our facilities on a regular basis. The spacing of these facilities is mandated by the DOT and may on occasion fall within a mapped Preliminary Priority Habitat (" PPH") or Preliminary General Habitat ("PGH") sage-grouse area. Any new conservation measures must allow for the location of these facilities within habitat areas. In addition, some facilities such as compressor stations and meter stat ions have to be located at certain points along an existing or new right-of-way ("ROW"). The locations of these facilities are, at limes, restricted due to engineering constraints and safety issues. Any conservation measures should allow the placement of operations and maintenance facilities within sage-grouse PPH and PGH habitat.	All	Both	emc0278GB
70.	On page 9 of 74, No. 3 Right-of-Way - Lands/Realty, the document addresses the need for offsite mitigation if disturbances exceed the 3 percent threshold. If mitigation is required to offset disturbance within sage-grouse habitat, the BLM needs develop a consistent policy across the sage-grouse range that identifies specific and defined mitigation ratios and the process used to identify suitable mitigation measures. This needs to include input from state and local working groups, state wildlife agencies, industry, ranchers, and other affected groups.	All	Both	emc0278GB
71.	On page 13 of 74, the first bullet states "Make priority sage-grouse habitat areas exclusion areas for new ROWs permits. Consider the following exceptions. Within designated ROW corridors encumbered by existing ROW authorizations: new ROWs may be co ·located only if the entire footprint of the proposed project (including construction and staging), can be completed within the existing disturbance associated with the authorized ROWs." Compliance with this conservation measure is unrealistic due to safety concerns. When constructing new facilities, El Paso's strives to maintain a safe working distance from existing natural gas pipelines, powerlines and other infrastructure to prevent unintentional incidents involving contact with our lines. This offset combined with the amount of construction ROW that is required to safely construct new projects might effectively prohibit collocation with existing natural gas pipelines. This measure further eliminates the potential for placement of any new ROW corridors within identified grouse habitats and virtually eliminates the potential for any new energy infrastructure throughout the range of the sage-grouse. El Paso would agree that through the use of seasonal timing restrictions and careful route selection, disturbances to these areas could be reduced or eliminated. However, a	All	Both	emc0278GB

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	complete elimination of new rights-of-way does not adhere to the BLM policy of multiple-use of the public lands.			
72.	The BLM should amend applicable land use plans to allow voluntary retirement of grazing permits, energy leases or other potentially-disturbing activities conducted under license, lease or permit on BLM lands at the request of the permit or lease holder.	All	BLM	emc0308GB
73.	The BLM should rely on the best available science concerning sage-grouse behavior, habitat needs, and conservation best-practices when developing land use guidelines.	All	BLM	emc0308GB
74.	Public lands must be managed to provide for multiple use including "the Nation's need for domestic sources of minerals, food, timber and fiber from public lands". land management must strive for a "sustainable yield" requiring "the achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple uses. Mineral exploration and extraction, grazing and other productive uses must be considered on equal footing with sage grouse management.	All	Both	emc0310GB
75.	If validity patent exams or buy-outs are proposed in any of the EIS alternatives, the scientific and legal basis must be provided for such actions. Such actions are inconsistent with Congress' repeated recognition that public lands must generally remain open to mineral entry and development. Additionally, if such measures are proposed, the EIS must address the provisions of Section 204 of FLPMA and the procedures that the Department of Interior must follow in order to withdraw public lands from mining, as well as fully consider socioeconomic and cumulative effect impacts related to these actions.	All	Both	emc0310GB
76.	In the document "A Report on National Greater Sage -Grouse Conservation Measures" the typical approach is to immediately seek to limit or withdraw public use as a means of conservation. The approach in the EIS and its alternatives should move away from such "stipUlations" and fully analyze the full array of all potential actions	All	Both	emc0310GB
77.	The EI5 must ciearly define and justify the baseline for both species population and habitat, further designated by public versus private ownership. This is critical to evaluate the need, extent, and associated impacts of any proposed new public land use restrictions. Absent this critical review, it is conceivable that the hard rock mining industry could suffer an undue burden of restrictive land use measures, despite being ranked near the bottom of the USFWS list of sage grouse threats.	All	Both	emc0310GB
78.	Sage-grouse habitat is much of the sage brush dominated areas of North America. To classify areas of the west as general habitat and restrict the problem to anthropogenic related causes is an over simplification of management issues. We are concerned that it could lead to restrictions of extremely large portions of the public lands resulting in denied access.	All	Both	emc0313GB
79.	Moreover, public lands ranchers own a significant portion of high-quality lowland brood rearing habitat as deeded property. According to the USDA Natural Resources Conservation Service (NRCS), "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands." However, if regulatory measures on public lands make ranching operations economically unsustainable, these operations are subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse conservation measures do not undermine the viability of public lands ranches.	All	Both	emc0315GB
80.	Any EIS or SEIS must also explicitly recognize the following points: In the Great Basin, and much of the western United States, livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire	All	Both	emc0315GB

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	rural communities that largely depend on ranching to maintain businesses and tax base.			
81.	About including private lands into the 3% calculation for disturbance in priority habitats. Many of the private lands will have disturbances and management of sage brush habitat that will skew the 3% calculation and reduce the allowed disturbance on federal land designated as priority habitat	All	Both	emc0319GB
82.	That future leasing in and around GSG habitat could be unreasonably delayed, or not occur at all, due to the bureaucratic decision-making process laid out in the IM.	All	Both	emc0319GB
83.	Rather than withdrawing the land to where there is no income coming into your agency by fees for exploration acres, both in the mining sector as well as the oil, gas & geothermal sectors, would it not have been more beneficial for you to allow the sale of the deferred leases and allowed the operators to aid in mitigating this problem in regard to the Sage Grouse? It seems to me the mining companies have done an excellent job in restoration projects throughout this State.	All	Both	emc0320GB
84.	VI. The EIS Must Evaluate Ways to Minimize Adversely Affecting Private Property Rights Federal land management agencies must properly define and protect valid existing rights as part of their planning processes. A number of the conservation measures and regulatory mechanisms recommended in the NTT Report have significant potential to diminish landowners' rights to develop their private property. The EIS must evaluate ways to minimize interfering with private property rights – including the rights associated with owning patented mining claims and fee mineral estates. BLM's proposal to recognize Valid Existing Rights (VERs) on valid claims (e.g., claims with a discovery of a valuable mineral deposit) does not go far enough to protect the property rights associated with patented mining claims and fee land because it restricts the analysis of the VERs to the four corners of a patented mining claim or the boundaries of the fee land. Instead, BLM and USFS must evaluate the substantially adverse consequences of making it impossible to develop private lands if the adjacent unpatented mining claims without a discovery are withdrawn from development. Similarly, if public lands needed for ROWs for roads, power lines, pipelines, etc. are no longer available for development, the patented claims, fee lands, and associated private property rights could be rendered worthless.	All	Both	emc0321GB
85.	VIII. The EIS Should Evaluate Whether the Conservation Measures and Regulatory Mechanisms in the NTT Report are Consistent with FLPMA Mandates to Take a Balanced Approach to Managing Public Lands FLPMA is premised on the overarching principle to use a balanced approach in managing the public lands. In enacting FLPMA in 1976, Congress directed the Secretary of the Interior to consider a broad range of resource issues, land characteristics and public needs and values in determining how public lands should be managed. Thus, FLPMA directs BLM to manage public lands for multiple-uses and to consider a wide array of resource values – including the need to protect wildlife – in the context of the Nation's needs for minerals, energy, food, fiber, and other natural resources. FLPMA does not authorize the subordination of any of these uses in preference for a single land use such as sage-grouse habitat conservation (emphasis added). FLPMA, Section 102(a)(7) establishes multiple-use and sustained yield land management directives and requires the Secretary to develop: … goals and objectives [that are] established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law (U.S.C. 1701(a)(7)) In defining the term "multiple use" FLPMA § 103(c) directs the Secretary to ensure: …management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources…to conform to changing needs and conditions; the use of	All	Both	emc0321GB

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	some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values. 43 U.S.C § 1702(c). Therefore, under the multiple-use and sustained yield requirement, BLM must strike an appropriate balance between potentially competing interests and land management objectives. This balance is to be achieved in the Section 102 land use planning process and the resulting RMPs. The EIS must evaluate whether and how the conservation measures and regulatory mechanisms recommended in the NTT Report achieve the required balance in managing the public lands. It also is incumbent on the agencies, when balancing the environmental analysis, to give equal consideration to the social and economic factors and not presume that environmental harm will outweigh all other considerations. Accordingly, the Ninth Circuit Court of Appeals in Lands Council v. McNair, 537 F.3d 981, 1005 (9th Cir. 2008) (en banc), stated: "Our law does not…allow us to abandon a balance of harms analysis just because an environmental injury is at issue." Given the current state of the U.S. economy, it is more important than ever to adhere to that statutory and judicial mandate so our communities and country remain healthy and vibrant.			
86.	BLM's proposed conservation measures would place lands with high-priority sage-grouse habitat off-limits to both mineral leasing and to locating mining claims. This is inconsistent with and in direct violation of the General Mining Laws (30 U.S.C. §§ 21, et. seq.) and FLPMA (43 U.S.C. 1701 et. seq). FLPMA lists twelve policies with respect to the public lands of the United States. Section 102(a)(12) states that it is the policy of the United States that: the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (30 U.S.C. 21a) as it pertains to the public lands; The Mining and Minerals Policy Act of 1970 declares, in part: [t]hat it is the continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in (1) the development of economically sound and stable domestic mining, minerals, metal and mineral reclamation industries, …. This policy of protecting the rights of the public to explore for and develop locatable minerals was expressly incorporated into the current BLM land-use planning framework established under FLPMA. Congress expressly provided that the land-use planning directives under FLPMA shall not "in any way amend the Mining Law of 1872 or impair the rights of any locators or claims under that Act, including, but not limited to, rights of ingress and egress" to public lands for mineral exploration and development. 43 U.S.S. § 1732(b). Consistent with these legal mandates, the sage-grouse EIS's should carefully consider the effects that potential sage-grouse conservation measures may have on mineral exploration and mining activities, and ensure that the adopted measures avoid or minimize adverse impacts on these types of activities. FLPMA does not authorize BLM to manage the public lands for sage-grouse conservation to the exclusion of other authorized multiple-uses. The Multiple-Use and Sustained Yield Act of 1960 (MUSYA) (16 U.S.C. 528) and the National Forest Management Act of 1976 contain similar policy declarations for the USFS. The Multiple-Use and Sustained-Yield Act directed the Forest Service to manage the National Forests according to the principle of "multiple-use" and "sustained yield." Significantly, in MUSYA, as in the Forest Service's Organic Act, Congress warned that "nothing" in the Act "shall be construed so as to affect the use or administration of the mineral resources of national forest lands . . . " 16 U.S.C. § 528. Specifically, section 4 of MUSYA defines "multiple use" as: the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best	All	Both	emc0321GB

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	meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output. 16 U.S.C. § 531. The EIS documents must evaluate how the proposed measures comply with the "harmonious and coordinated management of the various resources" directive in Section 531 of MUSYA. Clearly, withdrawing national forest lands from operation of the Mining Law in preference for sage-grouse habitat conservation is not a "harmonious or coordinated" way in which to manage these lands. As appropriately concluded by the U.S. Court of Appeals for the Seventh Circuit, the Forest Service does not have the discretion to ignore the multiple-use mandate to focus solely on environmental and recreational resources. That court held, "the national forests, unlike national parks, are not wholly dedicated to recreational and environmental values." Cronin v. United States Department of Agriculture, 919 F.2d 439, 444 (7th Cir. 1990). Thus, it is essential BLM and USFS carefully consider the impacts of potential conservation measures on mining and grazing activities, and that both agencies develop a balanced approach that will avoid or minimize the socio-economic effects such measures will have on mining, grazing, other multiple-use activities and local communities.			
87.	Page 12, Lands/Realty section indicates that rights-of-way (ROWs) should not be permitted in high priority sage-grouse habitat, with a few exceptions. The socio-economic impact of this conservation measure needs to be analyzed in the EIS. Restricting the new ROWs to be co-located entirely within an existing ROW is too restrictive (page 13, first bullet). The temporary, short-term use of a laydown yard or staging area that is too large to be co-located entirely within an existing ROW should not be sufficient reason for denying the use of the ROW. However, such short-term temporary use should be followed by reclamation to prevent non-native invasive species from establishing and re-establishing perennial vegetation.	All	Both	emc0322GB
88.	Under the Land Tenure Adjustment section (page 13) the conservation measure calls for retaining "public ownership of priority sage-grouse habitat." I find this offensive as it implies only the government can benefit and manage sage-grouse. The record over the last 60 years in Nevada would not support that implication.	All	Both	emc0322GB
89.	Public lands ranchers own a significant portion of high-quality habitat as deeded property and that deeded property is managed and used in conjunction with public grazing permits for the mutual benefit of protecting sage-grouse habitat, populations and major risks. According to the USDA Natural Resources Conservation Service (NRCS), "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands." The continued viability of livestock operations and beneficial role public land grazing plays and benefits sustainable livestock businesses needs to be emphasized in any national guidance.	All	Both	emc0323GB
90.	We sincerely hope the agencies will explore seasonal closures for defined, specific areas before resorting to widespread closures affecting thousands and perhaps millions of acres of land for extended periods of time. Many times, less is better if done in a targeted way	All	Both	emc0324GB
91.	Ideally, the agencies will designate areas of contiguous sage-grouse habitat not currently subject to valid existing rights for long-term or permanent protection. Where important sage-grouse habitat is subject to valid existing rights, the agencies can	All	Both	emc0329GB

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	increase the amount of protected priority habitat by aggressively pursuing available tools, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts. These remaining refugia can provide the intact, diverse, high quality sagebrush habitat that is vital to sage-grouse and obligate species in the sagebrush ecosystem.			
92.	Our recommendations for management policies in sage-grouse habitat follow. Fully protect priority habitat from large-scale disturbances (e.g., transmission lines, oil and gas wells, graded roads, etc.), as well as any type of development that affects population distribution and abundance at any level. Direct development to areas with low conflicts with greater sage-grouse conservation. Direct new development to pre-disturbed areas. If priority habitat cannot be fully protected from energy development due to valid existing rights, minimize impacts by limiting permitted disturbances to one per section with no more than 3% surface disturbance. Ensure that small scale disturbances do not cumulatively disturb more than 3% of each priority area. Agencies should not issue new leases or right-of-way permits within any priority area that is not currently subject to valid existing rights. Increase and enhance the amount of protected priority habitat by aggressively pursuing available tools, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts. In priority habitat, establish goals for enhancing habitat and building sage-grouse populations. In these identified areas, the agencies should work to reduce overall road densities, remove fences and enhance nesting cover, and take other steps y to improve habitat function. Establish priority habitat exclusion areas for new ROW permits.	All	Both	emc0329GB
93.	Clearly all forms of recreational users utilize roads, trails, campsites, facilities and other features/amenities on public lands. What is the purpose for singling out OHV use when, again, there is little if any scientific evidence that OHV recreation poses any more of a threat than other forms of recreation?	All	Both	emc0330GB
94.	Lastly, we cannot help but question a notice that calls out OHV recreation as a preliminary threat to a species that warrants endangered species protection, but does not even mention that hunting of that species remains legal in some impacted states. If this species can be protected while it is being lawfully hunted we respectfully submit that it can be protected without wholesale closures of public lands to multiple uses.	All	Both	emc0330GB
95.	Multiple Use Mandate Both the major federal land management agencies engaged in developing the EIS, BLM and the Forest Service, have a statutory-based multiple use mandate that recognizes public lands are an important source of minerals. • BlM's Multiple Use Mandate Section 302 of the Federal land Policy and Management Act (FlPMA) provides that "[t]he Secretary shall manage the public lands under principles of multiple use and sustained yield." 42 U.S.C. § 1732(a). Furthermore, FlPMA requires management of the public lands "in a manner which recognizes the Nation's need for domestic sources of minerals." 43 U.S.C. § 1701 (11)-(12). Similarly, BlM's 2006 Energy and Non-Energy Mineral Policy highlights the importance of mining on public lands and endorses "multiple use" as a guiding principle for land use management. The policy states BlM land use planning and multiple use management decisions will recognize that, with few exceptions, mineral exploration and development can occur concurrently or sequentially with other resource uses and further indicates that the least restrictive stipulations that effectively accomplish the resource objectives or uses will be used. See BlM 2006 policy at p. 2 • Forest Service's Multiple Use Mandate Congress established the national forest system through the OrganiC Administration Act of 1897, 30 Stat. 11 (June 4, 1897). By operation of the Transfer Act of 1905, 33 Stat 628 (February 1,	All	Both	emc0331GB

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	1905), stewardship of the national forests was transferred from the Department of the Interior to the Department of Agriculture. There followed over the ensuing decades a series of enactments in which Congress consistently and clearly specified that stewardship over the national forests would be guided by the principles of multiple use and sustained yield, i.e., the Multiple Use Sustained Yield Act of 1960, 16 U.S.C.§§ 528-31 (MUSYA); the Forest and Rangeland Renewable Resources Planning Act of 1974,16 U.S.C. §§1600-14; and the National Forest Management Act of 1976 (NFMA), 16 U.S.C. § 1600 et seq. These statutes consistently endorse multiple use and sustained yield. Specifically, section 4 of the MUYSA defines "multiple use" as: the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output. 16 U.S.C. § 531 . As appropriately concluded by the U.S. Court of Appeals for the Seventh Circuit, the Forest Service does not have the discretion to ignore that mandate to focus solely on environmental and recreational resources. That court held, "the national forests, unlike national parks, are not wholly dedicated to recreational and environmental values." Cronin v. United States Department of Agriculture, 919 F.2d 439, 444 (7th Cir. 1990).			
96.	o Discretion to Delay Approvals The IM provides that field offices retain the discretion to reject, deny or defer approvals for proposed activities, such as mineral leasing or rights of ways, in preliminary priority habitat areas. BLM offices are already deferring major projects based on the IM provisions.1 NMA believes it is procedurally incorrect to delay projects for two years while RMPs are revised to reflect new conservation measures for sage grouse. Sage grouse need to be addressed through the National Environmental Policy Act process for proposed projects and conservation measures incorporated into issued permits.	All	BLM	emc0331GB
97.	History demonstrates throughout the west that, in many resource arenas, a decision to restrict access to federal lands for various reasons, simply leads to further use and development of the resource on state and private lands	All	Both	emc0337GB
98.	Furthermore, in its Warranted but Precluded decision FWS identified power lines as directly affecting greater sage-grouse and outlined the possible threats: collision and electrocution hazard; decrease in lek recruitment; increase in predation; fragmentation of habitat; and facilitation of the invasion of exotic annual plants. Additionally, sage-grouse could be impacted through a direct loss of habitat and human activity (especially during construction periods). Transmission corridors pose a serious threat to the wide ranging sage-grouse and should be analyzed thoroughly in this process. The impacts of fragmentation from transmission lines and the tendency of greater sage-grouse to avoid large infrastructure like power lines should lead to the establishment of strong standards that guide transmission corridors to appropriate areas that avoid impacts to sage-grouse.	All	Both	emc0339GB
99.	Furthermore, in its Warranted but Precluded decision FWS identified power lines as directly affecting greater sage-grouse and outlined the possible threats: collision and electrocution hazard; decrease in lek recruitment; increase in predation; fragmentation of habitat; and facilitation of the invasion of exotic annual plants. Additionally, sage-grouse could be impacted	All	Both	emc0339GB

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	through a direct loss of habitat and human activity (especially during construction periods). Transmission corridors pose a serious threat to the wide ranging sage-grouse and should be analyzed thoroughly in this process. The impacts of fragmentation from transmission lines and the tendency of greater sage-grouse to avoid large infrastructure like power lines should lead to the establishment of strong standards that guide transmission corridors to appropriate areas that avoid impacts to sage-grouse.			
100.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - The placement of energy corridors and associated facilities may lead to negative impacts to greater sage grouse and their habitats.	All	Both	emc0343GB
101.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Placement, use, construction, and maintenance of roads and railroads in greater sage grouse habitat may lead to negative impacts	All	Both	emc0343GB
102.	Wind and Transmission Inside Core Areas • No wind energy development • Transmission lines should be buried underground or limited to existing electrical transmission corridors of • mile maximum width. Outside Core Areas • Wind farms and transmission lines sited at least 5 miles from active sage grouse leks and at least 3 miles from identified winter habitats. • Transmission lines allowed along existing electrical transmission corridors of … mile maximum width.	All	Both	emc0343GB
103.	At minimum, the NEPA analysis should address the following: • Excluding transmission lines from Core Areas, pursuant to the new BLM nationwide sage grouse IM.	All	Both	emc0343GB
104.	C. Renewable Energy Development on Federal Public Lands is an Appropriate and Accepted Land Use under the Multiple-Use Mandates Renewable energy is unquestionably among the diverse multiple uses that Congress intended for the public lands. Not only are renewable energy sources, like wind, a "renewable resource" as mentioned directly in the definition of "multiple use" under FLPMA and NFMA,37 but they are also an appropriate use of public lands explicitly envisioned by Congress. In the Energy Policy Act of 2005, Congress called for approval of non-hydropower renewable energy projects located on the public lands with a generation capacity of at least 10,000 megawatts of electricity within ten years of the enactment of the Act.38 Furthermore, on May 18, 2001, President Bush issued Executive Order (E.O.) 13212, "Actions to Expedite Energy-Related Projects," establishing the policy that federal agencies should take appropriate actions, consistent with applicable law, to expedite projects to increase the production, transmission, or conservation of energy.	All	Both	emc0344GB
105.	Renewable energy development thus is an appropriate use of the federal public lands pursuant to the multiple-use and sustainable-yield mandates under FLPMA and NFMA. Nevertheless, the new sage-grouse management policy substantially limits opportunities for renewable energy growth given the limitation of all discrete anthropogenic disturbances on just 3 percent of sage-grouse habitat across all land ownerships. This means that the renewable energy industry will have to compete with all other sources of anthropogenic disturbance for access to 3 percent or less of federal public lands containing sage-grouse habitat and, in some cases, this threshold may likely already have been met; in other words, no new uses may occur beyond what already exists in the landscape today.	All	Both	emc0344GB
106.	V. BLM Lacks the Authority under FLPMA and its Special Status Species Manual to Amend the Procedures for Obtaining a ROW Without Engaging in a Rulemaking BLM uses several sets of regulations to implement FLPMA and other laws. Most of the regulations that may affect BLM management guidance concerning sage-grouse management are found in section 43 of the Code of Federal Regulations, although some, such as the Council of Environmental Quality regulations, are found in other portions of the CFR. The relevant regulations are listed below: • 43 C.F.R. Subpart C, Minerals Management 3000	All	Both	emc0344GB

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	Series, contains regulatory authority for BLM operations, enforcement and reclamation of minerals actions on public lands. • 43 C.F.R. Subpart 4120, Grazing Management, contains the regulatory authority for grazing administration, use authorizations, permit terms and conditions for achieving resource condition objectives. Subparts 4140-4170 outline prohibited acts, enforcement, and penalties. Subpart 4180 is an example of how regulations provide direction for sage-grouse conservation. Within the scope of these grazing regulations, 43 CFR 4180.2(d), are included specific direction to the BLM State Directors to develop standards that among other things would address: o "(4) Habitat for endangered, threatened, proposed, candidate, or special status species; and; (5) Habitat quality for native plant and animal populations and communities..." In addition, Subpart 4180.2(e) requires development of guidelines to address: o "(9) Restoring, maintaining or enhancing habitats of Federal proposed, Federal candidate, and other special status species to promote their conservation." These regulations, however, pertain to mineral management and grazing, not BLM's consideration of ROWs for energy development. Therefore, these provisions cannot be relied upon to justify BLM's authority to issue the IMs with respect to wind energy development, without going through notice and comment. While FLPMA does give BLM discretion to deny ROWs for renewable energy development based on the public interest, it does not provide a general definition of "public interest,"43 nor does it define the term within the ROW context. Rather, the statute provides some guidance when discussing the consideration of a ROW application, however. Under FLPMA, when determining whether an exchange of land is in the public interest, the Secretary must "[g]ive full consideration to better Federal land management and the needs of State and local people, including needs for lands for the economy, community expansion, recreation areas, food, fiber, minerals, and fish and wildlife. . . ."44 The terms and conditions that each ROW must contain also provide additional guidance as to what Congress meant when it directed BLM to consider the "public interest." FLPMA directs BLM to include terms and conditions that "minimize damage to scenic and esthetic values and fish and wildlife habitat and otherwise protect the environment."45 The statute also directs the Secretary to require such terms and conditions as he or she deems necessary to "protect Federal property and economic interests."46 As these requirements illustrate, what constitutes the public interest requires a balancing of multiple factors. To balance these factors, BLM has promulgated regulations, which state: It is BLM's objective to grant rights-of-way . . . to any qualified individual, business, or government entity and to direct and control the use of rights-of-way on public lands in a manner that: (a) Protects the natural resources associated with public lands and adjacent lands . . . ; (b) Prevents unnecessary or undue degradation to public lands; (c) Promotes the use of rights-of-way in common considering engineering and technological compatibility, national security, and land use plans; and (d) Coordinates . . . all BLM actions . . . with state and local governments, interested individuals, and appropriate quasi-public entities.47 BLM's discretionary ability to apply such terms and conditions pertains even after a ROW has been granted.48 The agency's discretion is limited in that the "stipulations [may not be] either inconsistent with or tend to unreasonably encumber the proposed . . . project[]."49 For instance, in Shell Pipe Line Corp., BLM granted Shell a ROW that was subject to review after 20 years. Shell's argument that FLPMA did not grant BLM broad enough authority to modify or revise a ROW once granted was rejected by the Interior Board of Land Appeals (IBLA).50 The IBLA concluded that "clear[ly] . . . BLM may grant the right-of-way upon certain terms, conditions, and stipulations," reasoning that the agency must "balance the interests of right-of-way applicants with other interests requiring consideration."51 In another case, the IBLA noted that the stipulations imposed could not be unreasonably burdensome, but found that stipulations requiring prevention of water			

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	pollution and protection of fish did not impose an unreasonable burden.52 AWEA thus recognize that BLM has relatively broad discretionary authority to deny a ROW. In particular, the agency also has the statutory authority to impose terms and conditions on an application before it is approved as well the authority to modify the terms and conditions after approval. And, these modifications may include mitigating impacts to the environment. The scope of these modifications is limited, however, and there is nothing in the statute that allows an outright revocation of permit for any of the reasons specified in the IMs and the NTT Report. Moreover, the statute does not allow the type of generic limitations adopted in these documents, such as the 3 percent exclusion area, but rather permits terms and conditions to be imposed on an application-by-application basis. Therefore, as the IMs add a substantive requirement to BLM's existing authority under FLPMA and limit BLM's existing discretionary authority under that act, BLM was required to follow the APA's notice-and-comment procedures before making them effective. BLM also appears to justify its new procedures for considering ROW applications based on its policy set forth in a guidance document, the Special Status Species Management Manual (Special Species Manual).53 For instance, in the March 2010 IM, BLM states that "greater sage-grouse are BLM sensitive species that are to be managed to promote their conservation and to minimize the need for listing under the ESA, in accordance with the BLM's special status species policy."54 The Special Species Manual aims "to provide policy and guidance, consistent with appropriate laws, for the conservation of special status species of plants and animals, and the ecosystems upon which they depend."55 While the sage-grouse's "warranted but precluded" status falls within the bounds of the manual's ambit, the manual is merely an agency guidance document that cannot trump the duties imposed by the BLM's own organic statute—FLPMA. As discussed, BLM public lands must be managed "on the basis of multiple use and sustained yield unless otherwise specified by law"56 and a guidance document cannot alter that statutory mandate. The Special Species Manual itself requires that its guidance be applied so as to be "consistent with appropriate laws," further affirming that the BLM cannot rely on this policy statement as a means of ignoring its directive to manage public lands for a myriad of beneficial land uses. In other words, BLM cannot rely on its own agency guidance document to elevate single-species management above its statutorily imposed duty to promote multiple uses.			
107.	We concur that it is preferable to co-locate corridors whenever possible, however, the proposed exclusion of new corridors and the "undesignation" of corridors in sage grouse priority habitat, along with avoidance in areas of general habitat, virtually eliminates any new development except along existing ROWs. This proposed conservation measure does not take into account that all ROW corridors cannot be assumed to have an equal impact on sage grouse (i.e. infrastructure that is buried vs. on the surface) and therefore, should not be treated as having the same impact on local sage grouse populations. Nor does it take into account technological improvements that can reduce impacts in ROWs. A more effective and efficient strategy for sage grouse and industry would seek to minimize impacts in ROWs and utilize tradeoffs to minimize or eliminate impacts of existing infrastructure /ROWs as part of the mitigation for new ROW use.	All	BLM	emc0346GB
108.	BLM and Forest lands should not be expected to provide all needed sage-grouse habitat to meet such benchmarks. Private, state and tribal lands contribute a good share of sage-grouse habitat now and will continue to do so in the future. The State of Utah, in consultation with Uintah County, and private land owners have taken great strides to enhance sage-grouse habitat in the Diamond Mountain area, recognizing that this is not a marginal or insupportably small sage-grouse population.	All	Both	emc0376GB
109.	While the BLM's IM allows for the ongoing operation of existing facilities, it seems to place impediments in the way of access	All	Both	emc0378GB

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	to those facilities. Problematic is the recommendation that additional mitigation might be required for existing access roads and/or previously authorized access ROWs that might not have been constructed or improved to-date, if this improvement would exceed the proposed three percent disturbance threshold. The ability of electricity providers to safely access/maintain existing electrical facilities is crucial to reliability of the Western grid.			
110.	I believe that habitat plans should be site specific and not a state wide blanketed plan. We have already have had and are in the middle of Sage Grouse habitat vegetation projects on public and private lands in our allotment and county. A lot of private land in this area has some preferred use for Sage Grouse, taking livestock off the public range will result in over use of the private which in some areas more preferred to the Sage Grouse.	All	Both	emc0389GB
111.	We strongly encourage the agencies to prioritize their focus on public land use, or disuse, which poses a real threat to the greater sage-grouse and its habitat	All	Both	emc0396GB
112.	Preserving access to lands, both public and private, for those users without unnecessary restrictions due to the potential listing of a species with such a large habitat fosters this stewardship.	All	Both	emc0396GB
113.	The Interim Management IM provides that BLM when renewing or amending ROWs, assess the impacts of ongoing use of the ROW to greater sage-grouse habitat and minimize such impacts to the extent allowed by law. This would seem a clear violation ofBLM's multiple use mandate which provides for the multiple use and sustained yield of the public lands. Presumably the project has already undergone environmental analysis as required under NEPA, and the BLM has already considered its purpose and need and the ROW grant holder's interest and objectives in issuing a ROD or Finding of No Significant Impact. If minimization of impacts to greater sagegrouse results in the diminishment ofthe valid, existing rights of the ROW grant holder or is contrary to the grant holder's interest and objectives, then it would seem the BLM has acted arbitrarily and capriciously.	All	Both	emc0399GB
114.	BLM's RMP revisions should consider the valid, existing rights of the ROW grant holder, as well as the grant holder's interest and objectives, when renewing or amending existing ROW grants to minimize impacts to greater sage-grouse and greater sage-grouse habitat.	All	Both	emc0399GB
115.	In reviewing RO W applications, BLM must follow the CEQ regulations and consider a range of reasonable alternatives appropriate to BLM's purpose and need and the applicant's interest and objectives, and not engage in single species management. This fundamental NEP A principle should be incorporated into BLM's land use decision making process.	All	Both	emc0399GB
116.	However, many regions within the area encompassed by the proposed EIS's may not have sufficient private land (of the quality and size necessary) to meet all the mitigation needs for projects or activities on BLM or USFS-administered lands. Thus compensatory off-site mitigation actions are frequently proposed for public lands, e.g. enhanced conservation management, restoration, or additional protections, in lieu of private land acquisition.	All	Both	emc0407GB
117.	Likewise we also believe that all other uses on our public lands need not be curtailed as adequate planning can mitigate and in some cases promote the habitat that is conducive to Sage Grouse use and preservation.	All	Both	emc0410GB
118.	Is BLM just using public lands to fuel energy developer speculation schemes and exploration disturbance - and promoting the parties obtaining leases potentially bilking investors? Or is there a real threat of Oil and Gas? Detailed mapping of oil and gas leases, geothermal leases, wind and solar rights-of-ways and other leases/rows must be provided, so these questions can be answered. So must a map of mine claims. See:	All	BLM	emc0411GB

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	http://www.blm.gov/nv/st/en/info/newsroom/2012/march/nevada_state_office0.html. This was met by County Commissioners with anger. Http://elkodaily.com/news/local/sage-grousecause-of-delay-for-oil-gas-leases/article_180cf38c-6a09-11e1-8325-0019bb2963f4.html#.T2YYZY79o6E			
119.	It is essential that all ongoing activities, all leases /ROWs already issued - all get reviewed, altered, changed, amended and/or terminated where conflicts are identified with habitats in the interim and immediately upon completion of this process. Existing leases, rights-of-way, etc. must be immediately amended to at least comply with the terms of IMs that must be greatly strengthened and that should not be based on segregating habitat. This can be readily done. Simply overlay the land records of leases, rights-of-way, grazing permits, etc. with mapped habitats, and inform the lease/permit holder of new protective provisions.	All	Both	emc0411GB
120.	Another BMP is: "Place new utility developments, power lines, pipelines, etc. - and transportation routes in existing utility or transportation corridors." This is the same BMP that BLM has been using for decades, and that the agency routinely ignores. BLM violates this BMP all the time. This is continuing - for example with Gateway EIS proposed routes added by BLM in Idaho on the Nevada border and along the northern and other areas of the South Hills. These areas contain important sage-grouse habitats. Why did the public suffer through the Westwide Energy Corridor DOE EIS process -when just about every developer that comes along seeks a different gas pipeline or electric transmission line route, and BLM obliges them and accommodates this? Such bundling of new developments into existing developed corridors must be mandatory - not just a "BMP" readily cast aside.	All	BLM	emc0411GB
121.	The section "Calculating the Density of Disturbance within Key Habitat" describes conducting an "additional site-specific analysis of disturbance" after alternatives and a preferred alternative have been selected. Intensive site-specific information needs to be collected and analyzed to guide the development of alternatives and a Preferred Alternative before putting out a DEIS. This has not been done. Several potential route segments that BLM is allowing to be put forward are the dead opposite of col-locating or bundling lines.	All	Both	emc0411GB
122.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following conservation measures in the relevant Resource Management Plans and Land Management Plans. - Prohibit conversion of sagebrush habitat to any other use within priority sage-grouse habitat.	All	Both	flb0000gb
123.	It is also necessary that the preferred alternative explicitly recognize the key importance of public lands ranching operations to the success of sage-grouse conservation. Scientific research has repeatedly shown that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife species. Well-managed grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species. Moreover, public lands ranchers own a significant portion of high-quality lowland brood rearing habitat as deeded property. According to NRCS, "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands. However, if regulatory measures on public lands make ranching operations economically unsustainable, these operations are frequently subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse	All	Both	fli0000gb

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	conservation measures do not undermine the viability of public lands ranches.			
124.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	All	Both	flj0000GB
125.	Direct right-of-way permits (e.g. for transmission lines) to areas outside of priority habitat	All	BLM	fln0000rm
126.	is critical for BLM to consider implementing the following technical team recommendations as minimum standards: Use available tools to increase the amount of protected habitat (e.g. retiring oil and gas leases, buying out mineral claims	All	BLM	fon0000rm
127.	The Conservation Measures provide the following objectives for the management of sage-grouse habitat: II To maintain or increase current populations, manage or restore priority areas so that at least 70% of the land cover provides adequate sagebrush habitat to meet sage-grouse needs ..... Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership. Anthropogenic features include but are not limited to paved highways, graded gravel roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells and associated facilities, pipelines, landfills, homes, and mines. In priority habitats where the 3% disturbance threshold is already exceeded from any source, no further anthropogenic disturbances will be permitted by BLM until enough habitat has been restored to maintain the area under this threshold (subject to valid existing rights). While this standard is acceptable in theory, implementation of these standards on the ground will be problematic. Land managers will be forced to restrict activities that have been found to have little to no impact on the grouse in the FWS listing decision, in an attempt to achieve compliance with the standard. This is not good management and will directly impair public support for any initiative.	All	Both	rmc0033GB
128.	The proposed EIS should identify the actual acreage of land that industry occupies (by type of industry) vs. the amount of land designated as sage grouse habitat. Due to the small fraction of land occupied by industry, industry should not be restricted in areas designated as sage grouse habitat (whether it's critical or general habitat). Restrictions placed on industry should be equivalent to the percentage of habitat that they occupy.	All	Both	rmc0035GB
129.	The EIS identifies the BLM/FS land manager and Local Implementation Group that will determine the direction of Management. The Local Implementation group will apparently be made up BLM/FS and "Land Owners".	All	Both	rmc0036GB
130.	As proposed in the EIS, the local implementation team (landowners) is by nature EXCLUSIVE.	All	Both	rmc0036GB
131.	Will it be possible for a land owner, to cultivate the private land in a way not compatible with the EIS plan, say for production of high protein alfalfa for overseas export; while grazing cattle in another county on their allotment and still be EXEMPT? An example would be the ZX Ranch in Lake County. In general it is very poor policy indeed that begins by arbitrarily EXEMPTING some activity from a holistic Mitigation Plan. I recommend the grazing operation exemption either be eliminated from the EIS; or all mining and permitting operations and recreation modes not identified in the EIS be exempted from the Mitigation Plan as well.	All	Both	rmc0036GB
132.	There are competing pressures for use of public lands. The Proposed Planning Strategy is one of several that cumulatively have a negative impact on the public's ability to partake in recreational opportunities on public lands. The Proposed Planning Strategy should adequately evaluate and mitigate the cumulative losses of land for recreational opportunities, including but	All	Both	rmc0061GB, rmc0035RM

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	not limited to cumulative closures or limitations on public lands managed by Bureau of Land Management, the U.S. Forest Service, and other federal agencies.			
133.	The interdependence of private and public lands, especially BLM, but in some instances, Forest Service is a major issue. In Shoshone Basin and other areas, sage-grouse habitat includes a mixture of BLM and private lands. Management decisions affecting BLM or Forest Service lands can directly impact management options and land uses on associated private lands. Frequently, private lands make up a majority of acres within a BLM, grazing allotment. Because private components often originated through Homesteads, water rights and associated springs and wet meadows critical to sage grouse are mostly located on private lands. Private lands usually include the deeper, more productive soils with greater potential for favorable responses to habitat management.	All	Both	rmc0063GB
134.	The Meeker/White River and Parachute Piceance/Roan populations (Colorado Plateau MZ) are in the Uintah-Piceance geologic basin. These populations are small and isolated, and are threatened by demographic, genetic and environmental stochasticity due to small size and isolation. In addition, these populations are threatened by a suite of deterministic threats, including: housing and energy development, predation, disease, and conifer invasion. Based on projected habitat impacts (particularly energy development) under current management prescriptions, the FWS believes that all of the populations in the Colorado Plateau MZ will be reduced in size and isolated in the future.	CO	BLM	emc0070RM
135.	Each alternative should designate areas of contiguous sage-grouse habitat, not currently subject to mineral leases or other valid existing rights for permanent protection. These remaining refugia can provide intact, diverse, high quality sagebrush habitat, vital to sage-grouse and other sagebrush obligate species. Colorado BLM should identify contiguous areas of habitat that are not subject to valid existing rights in Colorado and set these areas aside from development, in all alternatives (Wyoming BLM proposed a similar action in Instruction Memorandum WY-2010-013).26 Colorado BLM could identify a minimum size for a contiguous area that should be set-aside from development, such that set-aside areas are large enough to be used by greater sage-grouse. This should be done in consultation with Colorado Parks and Wildlife and U.S. Fish and Wildlife Service. Colorado has relatively small and fragmented populations, and few large contiguous areas that are not developed or subject to valid existing rights. In Colorado, it may be necessary to set all areas not subject to valid existing rights aside from development, in order to conserve small isolated populations and provide refugia adjacent to areas likely to be developed. These identified, contiguous areas of undeveloped land should be considered for designation as Areas of Critical Environmental Concern in all alternatives. (See Section 8 on ACECs for further discussion). The plan amendment should ensure that ACECs will be managed appropriately.	CO	BLM	emc0070RM
136.	In addition, each plan should preserve options to set areas that are currently subject to valid existing rights, but not intensively developed, aside from future development. All alternatives should include this provision in areas of contiguous priority habitat that have not yet been intensively developed. For example, all alternatives in each plan should specify that, when valid existing rights in contiguous priority habitat areas that are not intensely developed, expire (e.g. existing oil and gas leases), these areas will be set-aside from future development. This is especially important in areas where a substantial proportion of the priority habitat is under valid existing rights.	CO	BLM	emc0070RM
137.	Recommendations: All action alternatives must include adequate baseline protections, including the following: 1) limit development to areas which have low conflicts with sage-grouse conservation, 2) full, permanent protections for contiguous,	CO	BLM	emc0070RM

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	undeveloped priority habitat, 3) strong protections for other key habitat if some development might be allowed, 4) designate Areas of Critical Environmental Concern and provide assurances that they will be managed appropriately, 6) preserve options to set priority habitat currently under valid existing rights aside from development in the future, 7) address any concerns stated by CPW and FWS in their comments on the current or draft preferred alternative in each plan, and 7) provide scientifically valid protections for priority and general habitat and linkages. All alternatives should advance sage-grouse conservation and establish a comprehensive regulatory framework to prevent the need to list the greater sage-grouse under the ESA.			
138.	The following recommendations must be analyzed as a starting point for effective conservation: Establish priority habitat exclusion areas for new ROW permits.	CO	BLM	emc0070RM
139.	(One of the NTT recommendations most important for Routt NF) Make general sage-grouse habitat areas "avoidance areas" for new rights-of-way. Id. at 13.	CO	USFS	emc0175RM
140.	It is critical for BLM to consider implementing the following technical team recommendations as minimum standards: Direct right-of-way permits (e.g. for transmission lines) to areas outside of priority habitat	CO	BLM	fll0000RM
141.	is critical for BLM to consider implementing the following technical team recommendations as minimum standards: Use available tools to increase the amount of protected habitat (e.g. retiring oil and gas leases, buying out mineral claims	CO	BLM	flm0000RM
142.	Direct right-of-way permits (e.g. for transmission lines) to areas outside of priority habitat.	CO	Both	flm0000RM
143.	As you may be aware, the Colorado State Land Board owns approximately 1 80,000 surface and subsurface acres of Public School Trust lands within Moffat County, much of which may be impacted by this decision. These School Trust Lands were granted to the State of Colorado by the United State Congress and pursuant to the Colorado Enabling Act of 1875 and the Colorado Constitution, they are managed for the long-term benefit of Colorado's public schools. As the entity entrusted with the responsibility to manage these lands, the Colorado State Land Board needs to have the ability to manage the trust assets in a manner that allows it to meet its ficuciary obligations. (Note, attachment to letter- map)	CO	Both	rmc0050RM
144.	The protection of prior existing rights and the rights of ingress and egress to State Trust lands for both surface uses and development of the mineral estate as currently stated in the Little Snake RYIP need to be considered in the process.	CO	Both	rmc0050RM
145.	i. Lander, WY RMP The establishment of ROW corridors, similar to the Designated Development Areas in Alternative D, would ensure that major ROWs occurred in areas of existing disturbance to the greatest extent possible. We also support co-locating communication facilities with existing sites to reduce new ground disturbances and cluster vertical disturbances. Reducing the number, size, and extent of disturbances would reduce habitat loss and fragmentation, maintain habitat connectivity, and ensure that large patches of habitat are available for greater sage-grouse (DEIS at 881-882).	East	Both	emc0089RM
146.	Each alternative should designate areas of contiguous sage-grouse habitat not currently subject to mineral leases or other valid existing rights for permanent protection. These remaining refugia can provide intact, diverse, high quality sagebrush habitat, vital to sage-grouse and other sagebrush obligate species. In Instruction Memorandum WY-2010-013, the Wyoming BLM proposed 11 contiguous square miles or sections as an appropriate minimum size for an area of habitat to qualify for being set-aside from development.6 The Wyoming BLM recognized these large unleased contiguous blocks as opportunities for grouse conservation. This number should be scaled to allow for protecting smaller contiguous areas in states with smaller	East	Both	emc0089RM

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	populations than Wyoming's, or in areas where there are few remaining contiguous 11-square-mile areas that are not subject to valid existing rights. These identified, contiguous areas of undeveloped land should be considered for designation as Areas of Critical Environmental Concern in all alternatives. (See Section 8 on ACECs for further discussion)			
147.	The following recommendations must be analyzed as a starting point for effective conservation: Establish priority habitat exclusion areas for new ROW permits.	East	Both	emc0089RM
148.	iii. Strong components of Wyoming's approach Within core areas, stipulations on BLM, FS, Wind River Indian Reservation, and State of Wyoming lands limit the number of projects and the amount of allowed disturbance (no more than 5%13) allowed per square mile or 640 acres. Surface disturbance is prohibited within a 0.6 mile buffer around active leks (no surface occupancy - NSO), which includes roads during the breeding, nesting and brood-rearing periods (mid-March through end of June). In addition, a March 15 to June 30 timing limitation stipulation is required within nesting habitat within 4 miles of leks. Main roads used to transport production and/or waste products must be more than 1.9 miles from the perimeter of occupied grouse leks. Other roads used for access or maintenance must be more than 0.6 miles from the perimeter of occupied leks. Noise levels at the perimeter of a lek should not exceed 10 dBA above ambient noise from 6 pm to 8 am, so as not to disturb breeding activities (March 1 - May 15). Finally, proponents of new projects are expected to coordinate with the permitting agency and WGFD biologists to determine which leks need to be monitored and what data should be collected/reported. The Executive Order clearly identifies thresholds and outline adaptive management responses if declines in sage-grouse numbers occur14. However, in non-core areas, the EO recommends a 2-mile seasonal buffer around occupied leks and a 0.25 mile NSO buffer around active leks. Research has shown that the latter stipulation is inadequate and scientifically without merit. In addition, a surface disturbance cap is lacking from non-core area stipulations	East	Both	emc0089RM
149.	iii. Strong components of Wyoming's approach For transmission lines, 2-mile wide transmission corridors have been identified in an effort to collocate disturbances. Construction is prohibited between March 15 and June 30 (or between December 1 and June 30 in winter concentration areas) and within 0.5 miles on either side of the existing transmission lines. If new lines are proposed for core area, they must be either buried or outfitted with raptor per deterrents to minimize avian predation pressure on sage-grouse.	East	Both	emc0089RM
150.	Overall, maintaining migration corridors and habitat connectivity across jurisdictional boundaries (including state lines) will play an essential role in successful conservation strategies. Care must be taken to ensure that each proposed ROW project is informed by adequate site-specific impacts analysis including cumulative impacts of multiple lines and current information on habitat and other ecological values.	East	Both	emc0089RM
151.	Recommendation: The BLM and FS should use range-wide planning as an opportunity to provide input on how zoning could help direct both wind turbines and transmission away from sage-grouse and other sensitive wildlife habitats, including designating zones and/or providing detailed guidelines for designation.	East	Both	emc0089RM
152.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	GB	Both	emc0304GB
153.	The EIS and SEIS revisions should clarify that multiple-use management concepts should be used to reduce the risk of catastrophic wildfire, improve forage, remove invasive species and provide open space. We strongly encourage the agencies	GB	Both	rmc0056GB

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	to prioritize their focus on public land use, or disuse, which poses a real threat to the greater sage-grouse and its habitat.			
154.	Further, we believe that each industry, indeed each project, should bear the cost of the mitigation it requires. Conversely, each industry or project that improves habitat or increases population should be rewarded with additional opportunities to utilize resources. For example, if a developer plans to construct wind turbine generation which will negatively impact the sage grouse population, those impacts could be offset by the concurrent construction of a bio-fuels generation facility which utilizes sustainable pinyon and juniper harvesting. In contrast, a proposed project should not be permitted to offset its impacts by eliminating another existing use unless the affected user is justly compensated. For instance, mitigation measures for a wind farm should not include relocation of an existing power line unless the wind farm developer absorbs the construction costs of the new line, including permitting and design, and demolition costs of the existing line.	GB	Both	rmc0056GB
155.	The NOI states, "The RMP and LMP amendments/revisions will recognize valid existing rights." We concur that revisions to RMPs and LMPs must recognize valid existing rights.	GB	Both	rmc0056GB
156.	Scheduling or restricting the timing of multiple-use activities should be flexible to account for unusual weather conditions or variations in sage grouse occupancy. Adherence to rigid dates or times of day should be tempered by on-the-ground observations and monitoring.	GB	Both	rmc0056GB
157.	Land acquisition (private to federal) is often mentioned as one approach to conserving sage grouse (and other sensitive species). This should not be a goal in counties that are predominately public lands and federally administered. Further increases in public lands severely limits economic opportunity and many rural counties cannot survive with additional limits imposed on their potential for economic growth.	GB	Both	rmc0067gb
158.	If we have a viable population, then remove Lemhi County from the designated area completely	IDMT	Both	emc0045GB
159.	Clark County is 75% publicly owned. If we allow an animal to shut down the use of that public owned property, it could mean the shutting down of our county and it's residents. Scientists seem to keep doing studies on wildlife in the area without the input of the residents, especially those who have lived here all their lives and know the patterns and cycles of the animals better than the scientist who passes through for a few months in a certain year. We as residents have also witnessed that these scientists re-invent the wheel every time they do a study, never communicating the last study. How sound of science is that?	IDMT	Both	emc0128GB
160.	The Group has developed a sage-grouse conservation plan for Jarbidge Planning Area, which includes the goals outlined below. We ask that the BLM consider these goals as they finalize the Sage-Grouse Planning Strategy. -Encourage cooperation between private, State, and Federal landowners	IDMT	Both	emc0158GB
161.	I am writing to show my support for permanently withdrawing the remaining land parcels in Nye County that are being considered for lease options to oil and gas companies.	NVCA	Both	emc0019GB
162.	The Churchill County Board of County Commissioners passed a resolution in December 2011, adopting the "Policy Plan for Public Lands" (Plan) of the Churchill County Master Plan. The Plan is a guide, developed by the citizens and local government regarding the use of public lands in Churchill County. The Plan addresses federal land use management issues and is intended to be used as a positive guide for federal land management agencies in their development and implementation of federal land plans and management actions. The Plan outlines expectations and desires of the people of Churchill County and requires	NVCA	Both	emc0151GB

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	consultation prior to decisions that affect public lands within the County's boundaries. Churchill County is desirous of cooperation from the Bureau of Land Management and other federal agencies. If the U.S. government (under any agency) intends to change uses or availability of resources on public lands in a way that will impact current historical and cultural uses, input from the citizens of the County is required and the Board of County Commissioners will be consulted. The multi-use nature of public lands requires that management decisions be made with the public's interest at the forefront and careful consideration to maintaining a sustainable economy and sustainable resources for future generations.			
163.	lands/realty: Agencies' conservation measures must be robust to address one of the two greatest threats identified for Sage Grouse and its sagebrush habitat - habitat loss, degradation and fragmentation, many of which have occurred because of the agencies lands and realty programs. The Ruby gas pipeline, which cut through over 300 miles of remote relatively intact sagebrush habitat from the Utah border to the California/Oregon border, is the poster child of what not to do for Sage Grouse conservation in Nevada. A map shows the pipeline route selected by the project proponent which appears to maximize adverse impacts on Sage Grouse leks and other priority habitats in Nevada and other western states. The ROW was approved despite the substantial impacts to Sage Grouse and its habitat and the pollyanna promises of mitigation and restoration. Required mitigation has failed to reclaim pipeline construction impacts and this huge swath of now fragmented Nevada's sagebrush country is covered with weeds.	NVCA	Both	emc0283GB
164.	The worst potential example of habitat destruction and fragmentation and lack of regulatory controls - the Clark, Lincoln, and White Pine Counties Groundwater Development Project, proposed by the Southern Nevada Water Authority, has been examined in a draft EIS, but has not yet been approved by the BLM. While the EIS did disclose general impacts on wildlife, the approach which the BLM used did not result in specific information on how many acres of Sage Grouse habitat would be lost, degraded or fragmented by the proposal. Likewise, BLM's "regulatory" authority did not extend to requiring avoidance or minimization of, or compensation for, severe adverse impacts to Sage Grouse and its habitat, just some BMPs for pipeline construction and operation impacts,. Instead, it appears that the BLM is going to accept voluntary mitigation proposed (promised) by the ROW proponent for the massive adverse impacts of the groundwater mining and exportation proposal. These impacts include dropping of water tables, drying springs, creeks, and wet meadows or subsidence on public lands critical for Sage Grouse and priority habitats over 4000 square miles or 2,600,000 acres of public and private lands in eastern Nevada and western Utah. See: http://www.blm.gov/nv/st/en/prog/planning/groundwater_projects.html	NVCA	Both	emc0283GB
165.	We strongly recommend that conservation measures in the EIS contain, as a minimum, the following recommendations, largely based on National Technical Team guidelines: a. the agencies must retain all priority habitat areas in public ownership. They should also evaluate the potential negative impacts on Sage Grouse conservation of disposing of public lands in general habitat areas and retain general habitat areas which have good potential for restoration and which may replace priority habitats destroyed by stochastic events. b. the agencies should acquire private lands in priority habitats, general habitats, and restoration habitats, through purchase, donation, or exchange or through conservation easements in cooperation with NRCS and other federal agencies private land programs. c. the agencies should initiate land withdrawals from mining and military uses in all priority habitats. d. the agencies should affirm its regulatory discretion to reject ROW permit applications because of substantial adverse impacts of the proposal to Sage Grouse and priority habitats, other national priorities and Congressional directions not-withstanding. e. the agencies should designate ROW exclusion areas in	NVCA	Both	emc0283GB

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	priority habitats and avoidance areas in general habitats in each PMU. f. the agencies should require co-location of utilities in existing ROWs. g. the agencies should require burial, removal or modification of power lines in priority habitats h. the agencies should reclaim unused ROWs or relocate them outside of priority habitats i. the agencies should require bonds sufficient for full reclamation and restoration of utility corridor disturbances to priority habitats. j. the agencies should charge impact fees for any unavoidable loss or degradation of priority habitats because of development impacts. k. the agencies should cooperate with NRCS and state and private land owners to implement Sage Grouse conservation measures on state-owned and privately-owned lands in priority habitat areas. l. the agencies should designate Sage Grouse management areas or Areas of Critical Concern to protect priority habitats (as well as some general and restoration habitats to compensate for annual unavoidable habitat losses) and dense populations (not populations in constrained or isolated communities), with enforceable protections to conserve Sage Grouse habitats. Such reserves should be selected to sustain biological processes, maintain intact sagebrush habitat, recover species, buffer against climate change effects and land uses, including weed invasions and wildfires, protect connectivity, have good potential for restoration, and achieve the goals of biological representation and ecological redundancy and resiliency within the sagebrush ecosystem. These special Sage Grouse areas should be withdrawn from all mineral entry and closed to new fluid mineral development and ROWs and unavoidable surface disturbances should be avoided or minimized or compensated. m. the agencies should develop management plans for these special Sage Grouse areas sufficient to mandate protection of Sage Grouse and its habitat and are enforced. Without more regulatory authority from the land use plan, the designation of an ACEC is not sufficient for actual protection and conservation of Sage Grouse. For example, the Proposed Action for the Groundwater Development project draft EIS (see comments on pages 3 and 5) include plans for a non-conforming buried water reservoir in the Coyote Springs ACEC, which was designated by the BLM in 1998 as part of the Desert Tortoise recovery plan.			
166.	Other agency-controlled use of public lands such as the Federal Highway Administration and the Federal Energy Regulatory Commission must be subject to Sage Grouse conservation measures added to land use plans, or disasters like the Ruby gas pipeline project in Nevada (see comments on page 3) will undercut and negate the BLM and USFS Sage Grouse conservation initiative.	NVCA	Both	emc0283GB
167.	Likewise, Sage Grouse Conservation measures added to land use plans should also apply to military uses of public lands, both on-the-ground disturbances and aerial uses which cause noise, and release toxic chemicals or bombs in Sage Grouse habitat.	NVCA	Both	emc0283GB
168.	Likewise, Sage Grouse Conservation measures added to land use plans should also apply to military uses of public lands, both on-the-ground disturbances and aerial uses which cause noise, and release toxic chemicals or bombs in Sage Grouse habitat.	NVCA	Both	emc0283GB
169.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	NVCA	Both	emc0304GB
170.	BLM and USFS already have rules and policies in place to ensure that mineral exploration projects protect sage-grouse habitat. NVMRA members have first-hand experience operating under and complying with these rules and policies. The BLM Notices and BLM and USFS Plans of Operations that authorize our exploration activities on BLM-administered public lands and on USFS-administered national forest lands contain numerous permit conditions and stipulations pertaining to sage-grouse habitat protection. These measures include seasonal restrictions on when and where we can operate and defme	NVCA	Both	emc0327GB

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	sage-grouse habitat areas (primarily leks and a surrounding buffer zone) that are off-limits to our activities. Because these existing rules and policies already provide substantial protection to sage-grouse habitat, the proposed land use prohibitions and withdrawals are excessive and completely unnecessary.			
171.	In making investments to locate claims and explore for minerals on public lands, NVMRA member companies have also relied on the RMPs that BLM district offices have developed to govern management of these lands. These RMPs clearly identify lands with special management considerations and lands that are open to location under the Mining Law and available for other multiple uses.	NVCA	Both	emc0327GB
172.	In enacting in FLPMA in 1976, Congress directed the Secretary of the Interior to consider a broad range of resource issues, land characteristics, and public needs and values in determining how public lands should be managed. FLPMA directs BLM to manage public lands for multiple uses and to consider a wide range of resource values - including the need to protect wildlife - in the context of the Nation's needs for minerals, energy, food, fiber, and other natural resources.	NVCA	BLM	emc0327GB
173.	The multiple use and sustained yield directives in FLPMA require BLM to strike an appropriate balance between potentially competing interests and land management objectives. This balance is to be achieved in the Section 102 land use planning process and the resulting RMPs. FLPMA does not authorize the subordination of any of these uses in preference for a single land use such as sage-grouse habitat conservation. The EIS must evaluate how the land use restrictions, prohibitions, and withdrawals recommended in the NTT Report achieve the required balance in managing the public lands. This evaluation cannot be reasonably completed without appropriate, up-to-date and accurate data. It is equally impossible to analyze the effectiveness of the proposed sage-grouse conservation measures or make a meaningful comparison of the effectiveness of other alternatives if the underlying baseline data is inaccurate, stale or otherwise unreliable.	NVCA	Both	emc0327GB
174.	NVMRA contends that the land use restrictions and prohibitions - especially the proposed withdrawal of high-priority sage-grouse habitat areas from mineral entry are not consistent with FLPMA's multiple use mandate or the specific directive pertaining to minerals in FLPMA § 102(a)(12): " … the public lands [shall] be managed in a manner that recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including the implementation of the Mining and Minerals Policy Act of 1970 [at] 30 U.S.C. 2la … " [(43 U.S.C. 170l(a)(12)] The proposed restrictions and withdrawals from mineral entry outlined in the NTT Report directly conflict with FLPMA's requirement that the Secretary must manage public lands to respond to the Nation's needs for minerals.	NVCA	Both	emc0327GB
175.	BLM's proposed conservation measures and regulatory mechanisms must not conflict with FLPMA or USFS laws. The EIS documents must provide a detailed discussion of how the Proposed Action, Agency Preferred Alternative, and Alternatives Considered in Detail comply with the mandates in FLPMA and USFS laws to achieve the appropriate balance between a variety of public land use objectives that include sage-grouse habitat conservation - but not at the expense or exclusion of other uses of public lands.	NVCA	Both	emc0327GB
176.	Unfortunately, the land use restrictions, prohibitions, and withdrawals recommended in the NIT Report deem sage-grouse habitat preservation the highest and best use of the public lands. Adopting this single-use perspective would be a sea change in the way in which BLM manages public lands and USFS manages the national forests. This draconian change conflicts with the underlying multiple-use concepts in FLPMA and USFS laws.	NVCA	Both	emc0327GB

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177.	NVMRA member companies embrace all reasonable efforts on the federal, state, and local levels to protect and enhance greater sage-grouse habitat. The sage-grouse conservation measures in place at NVMRA member companies' exploration projects demonstrate our members' commitment to sage-grouse protection. However, the land use restrictions, prohibitions, and withdrawals in the NTT Report go too far and conflict with BLM's FLPMA responsibilities to manage public lands with a balanced approach the recognizes the importance of a wide range of resource issues on public lands and the need for domestic sources of minerals.	NVCA	Both	emc0327GB
178.	SNWA respectfully requests that the EIS consider and discuss the following: effects of implementation of additional or revised greater sage-grouse conservation measures on issuance of pending, and future rights-of-way;	NVCA	Both	rmc0069GB
179.	SNWA respectfully requests that the EIS consider and discuss the following: effects of implementation of additional or revised greater sage-grouse conservation measures on issuance of pending, and future rights-of-way;	NVCA	Both	rmc0069GB
180.	How will the EIS review and coordinate Oregon's Comprehensive Land Use statutes? Knowing that Oregon has the most restrictive land use plans in the nation may provide an easy resolution for "more adequate regulatory mechanisms".	OR	Both	emc0071GB
181.	ODOT recognizes the challenge that the BLM / USFS will face in developing a comprehensive land management plan that effectively addresses the many concems and interest while attempting to focus on the greater sage-grouse and habitat improvement. The demand on public lands is diverse. In reviewing the Jan 10, 2012 News Release, initiating the planning process and identifying the public meeting schedule to be conducted around Oregon, it was encouraging to see that a list of issues or concerns had already been identified including: mineral materials and rights-of-way. How mineral material sites and highway rights-of-way are identified and dealt with in this plan is of great concem for ODOT.	OR	Both	emc0155GB
182.	In the ODFW Greater Sage-Grouse Conservation Assessment and Strategy of Oregon: A Plan to Maintain and Enhance Populations and Habitat, it states that greater sage-grouse currently occupy habitats in Baker, Crook, Deschutes, Hamey, Lake, Malheur and Union Counties. BLM is identified as the primary land manager of greater sage-grouse habitat, controlling 70% of the habitat in Oregon. The BLM web site indicates that in Oregon BLM manages 15.7 million acres, with 12.5 million acres lying within the 7 counties shown as containing greater sage-grouse. In these 7 counties, ODOT is responsible for nearly 2000 miles of Federal and State transpoliation system. Within the identified 7 counties, the local road depmiments are responsible for more than 6000 miles of county road system. In addition to the highway system, in these counties ODOT has been granted long term use of 195 material source propeliies located on federal land. The ODFW report in discussing Road Rights-of-Ways, states: "Disturbance from high volume roads can lead to avoidance of otherwise suitable habitat or direct mortality of birds. Minimize the construction of new roads through occupied sage-grouse habitat, especially lel{, nesting and brood-rearing areas." In addition to the statement shown above the ODFW report includes text and mapping associated with what has been identified in the report as "Core Areas". The report states that "core areas" are based on biological information with a focus on breeding areas. Included on the ODFW habitat maps for the "core areas" they have also mapped areas identified as "Low Density". A review of the maps associated with these habitat areas, shows that most of the state transportation facilities cross through areas mapped as either "Core Areas" or "Low Density". Text in the report states ODFW would recommend "avoidance of impacts to sage-grouse habitat that occur in Core Areas, and mitigation at no net loss with net benefit for sage-grouse habitat that occur in Low Density Areas". Not all Federal, State and County road miles within these 7 counties are located on federal land. In addition, not all transportation facilities on federal land pass	OR	Both	emc0155GB

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	through identified greater sage-grouse habitat. But with over 8000 miles of Federal, State and Local transportation system crisscrossing these 7 counties and with 195 ODOT controlled federal land material sources, there is a high probability of conflict here in Oregon between greater sage-grouse habitat management and transportation facilities.			
183.	Considering the miles of highway that ODOT is responsible for and how road rights-of-ways are addressed in the ODFW report, it should be obvious that ODOT is very concerned with how existing and future highway facilities and material sources will be addressed within this management plan. Based on the findings from several recognized studies, ODOT believes highway related activities within existing rights-of-way should be exempted from added scrutiny based solely on habitat for greater sage-grouse.	OR	Both	emc0155GB
184.	Sage-grouse generally do not prefer to occupy habitat near high volume roads (Lyon and Anderson 2003, Connelly et al. 2004, Aldridge and Boyce 2007). The majority of ODOT managed transportation facilities are major highways and freeways with relatively high traffic noise (up to 90 decibels). Connelly et al. (2004) indicated there were no active sage-grouse leks within 2 kilometers (km) of Interstate 80 across southern Wyoming and only 9 leks were known to occur between 2 and 4 km of I-80. ODOT biologist have conducted numerous environmental reviews and surveys over the years for transportation projects and associated material sources and have not encountered greater sage-grouse or identified areas of active use by these birds. Over the course of the last decade ODOT has been collecting data on collisions between wildlife and motor vehicles. Over this period no incident of sage-grouse killed by vehicles along ODOT transportation facilities has been recorded. ODOT believes that existing traffic, noise and disturbance along these transportation corridors generally precludes sage-grouse presence within the existing highway right-of-way and likely the areas immediately adjacent. Therefore, ODOT transportation corridors and their associated right-of-way should be exempt from any sage-grouse restrictions or exclusions.	OR	Both	emc0155GB
185.	As the agency proceeds in this matter, it is important to consider the implications that regulation may have on private land ownership. Many ranchers own private property that supports sage-grouse habitat but depend on public grazing to maintain the economic viability of their operations. If overregulation causes ranching operations to become unsustainable, ranchers may have no choice to sell or develop their private property, resulting in the loss of critical sage-grouse habitat.	OR	Both	emc0309GB
186.	In summary, the best available scientific evidence shows that public grazing is important for sage-grouse conservation. In addition, public grazing maintains the economic sustainability of livestock producers and provides substantial economic benefits to the communities in which they live and the economy of Oregon as a whole. In turn, by maintaining the economic sustainability of livestock producers, public grazing protects sage-grouse habitat by reducing the need for ranchers to sell or develop their private property in a manner that is detrimental to sage-grouse habitat.	OR	Both	emc0309GB
187.	Do I as a homeowner in La Grande with a 30 year mortgage on .3 acres, have the same status and chance of participation in program planning and oversight, as the Corporation (say the Simplot Family Trust) that owns or controls more than a million acres; and the ZX Ranch, the largest grazing allotment holder in eastern Oregon?	OR	Both	rmc0036GB
188.	The ODWF EIS should take the words of the expert it cites, and adopt the BLM RAC model for developing Local Implementation groups; which will insure the opportunity for all stakeholders to participate in the process. If not, I fear the ODFW will continue the long history of contentiousness between competing interests, that has plagued the public and clogged the courts with environmental cases since the 1970's. The ODFW EIS should implement its own recommendation	OR	Both	rmc0036GB

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	to other agencies first; following the recommendations for full participation as envisioned by Burkes (2004).			
189.	The ODFW EIS needs to identify and analyze all potential socio-economic impacts related to Private Industries and Public Works projects which now require permits that are developed in consultations with the ODFW through the Environmental Assessment (EA) or EIS processes. Examples include the Mining Industry and large scale public works and improvements that rely on Federal Mineral and Rock materials for completion (ie. Development of New Irrigation Canals or Water Improvements).	OR	Both	rmc0036GB
190.	The ODFW EIS should also include an analysis of potential increased costs to Public Works and Improvement projects that rely on "Free" rock and mineral material from rock quarries located on federal lands in Sage Grouse country. For instance, many road projects now depend on road armor or base materials mined from sometimes long inactive borrow pits that have partially vegetated with Sage during long periods of activity. If located in Category 1 or 2 areas or migration corridors, these borrow pits may require an EIS to reopen. Otherwise a more distant source for rock must be found; increasing transportation and logistical costs to public funded projects.	OR	Both	rmc0036GB
191.	It is also necessary that the preferred alternative explicitly recognize the key importance of public lands ranching operations to the success of sage-grouse conservation. Scientific research has repeatedly shown that properly managed grazing is beneficial to the greater sage-grouse and to a host of other wildlife species. Well-managed grazing can improve sage-grouse habitat by increasing the quality and accessibility of forbs and other beneficial vegetation and also aids in the control of invasive plant species. Moreover, public lands ranchers own a significant portion of high-quality lowland brood rearing habitat as deeded property. According to NRCS, "[a]pproximately 40 percent of sage-grouse habitat that supports populations occurs on privately owned lands." However, if regulatory measures on public lands make ranching operations economically unsustainable, these operations are frequently subject to sale and development, leading to fragmentation and loss of key habitat. It is therefore essential that the preferred alternative incorporates explicit steps to ensure that sage-grouse conservation measures do not undermine the viability of public lands ranches.	OR	Both	rmc0078GB
192.	Any EIS or SEIS must also explicitly recognize the following points: In the Great Basin, and much of the western United States, livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire rural communities that largely depend on ranching to maintain businesses and tax base.	OR	Both	rmc0078GB
193.	Many of Kingston's citizens rely on using public lands to provide an income for their families and most of Kingston's citizens use public lands for recreation and hunting. Our right to use these lands is continually being challenged. Most of those wanting to limit public use of these lands are not concerned about the impact on the local population and they find any issue they can to drive their agenda.	UT	Both	emc0176GB
194.	Lands and Realty issues such as preservation of energy corridors for pipelines and overhead power lines must be addressed in the RMP amendments. Existing energy corridors and proposed Energy Gateway South and TransWest Express corridors should be recognized and considered for exclusion from sage grouse preliminary priority or preliminary general habitat designation.	UT	Both	emc0242GB
195.	Lands and Realty issues such as preservation of energy corridors for pipelines and overhead power lines must be addressed	UT	Both	emc0376GB

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	in the RMP amendments. Existing energy corridors and proposed Energy Gateway South and Trans West Express corridors should be recognized and considered for exclusion from sage-grouse preliminary priority or preliminary general habitat designation.			
196.	There are several legal documents that uphold the right of landowners and livestock owners to use trails, pasture and reservoirs on federally managed lands. One of these is the MCKELVEY VS. US where the Supreme Court ruled that a stock trail 3 miles in width established in local custom was equally as legitimate as an SRHA stock trail. Cattle owners or their employees who have such ROWs(rights-of ways) are the owners of such ROWs and cannot be held guilty of trespass by the use of such ROWs. (Curtin vs. Benson 1911). "Land to which right and claims of others exist is not public land" -upheld by the U.S. Supreme Court.	WY	Both	emc0050RM
197.	The BLM has control of minerals UNDER many private land parcels in the state. This split estate concept does NOT give BLM the constitutional right to assume, require, threaten, or otherwise maintain the federal agency has control over management of the private land on the surface. If BLM believes otherwise they need to show where in the Constitution and within the Individual State this is an established law. Private property surface rights are separate from minerals rights under the soil surface.	WY	BLM	emc0050RM
198.	It would be much more efficient if the BLM would also sell isolated parcels to the public with the lease holder and /or neighboring land owners having final bid rights to purchase the land. Isolated parcels are not manageable for the federal agency, land sales would give them more money for managing the land they do have and selling isolated parcels would allow the neighboring landowners and or lease holder to buy something that would work within their operations. Selling isolated parcels would be a win-win for everyone. A neighboring landowner might be willing to trade ownership for land of equal or greater appraisal if it fit into their management operation better. The checkerboard pattern makes it very difficult for all involved to manage effectively.	WY	BLM	emc0050RM
199.	i. Lander, WY RMP The establishment of ROW corridors, similar to the Designated Development Areas in Alternative D, would ensure that major ROWs occurred in areas of existing disturbance to the greatest extent possible. We also support co-locating communication facilities with existing sites to reduce new ground disturbances and cluster vertical disturbances. Reducing the number, size, and extent of disturbances would reduce habitat loss and fragmentation, maintain habitat connectivity, and ensure that large patches of habitat are available for greater sage-grouse (DEIS at 881-882).	WY	Both	emc0089RM
200.	Each alternative should designate areas of contiguous sage-grouse habitat not currently subject to mineral leases or other valid existing rights for permanent protection. These remaining refugia can provide intact, diverse, high quality sagebrush habitat, vital to sage-grouse and other sagebrush obligate species. In Instruction Memorandum WY-2010-013, the Wyoming BLM proposed 11 contiguous square miles or sections as an appropriate minimum size for an area of habitat to qualify for being set-aside from development.6 The Wyoming BLM recognized these large unleased contiguous blocks as opportunities for grouse conservation. This number should be scaled to allow for protecting smaller contiguous areas in states with smaller populations than Wyoming's, or in areas where there are few remaining contiguous 11-square-mile areas that are not subject to valid existing rights. These identified, contiguous areas of undeveloped land should be considered for designation as Areas of Critical Environmental Concern in all alternatives. (See Section 8 on ACECs for further discussion)	WY	Both	emc0089RM

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
201.	iii. Strong components of Wyoming's approach Within core areas, stipulations on BLM, FS, Wind River Indian Reservation, and State of Wyoming lands limit the number of projects and the amount of allowed disturbance (no more than 5%13) allowed per square mile or 640 acres. Surface disturbance is prohibited within a 0.6 mile buffer around active leks (no surface occupancy - NSO), which includes roads during the breeding, nesting and brood-rearing periods (mid-March through end of June). In addition, a March 15 to June 30 timing limitation stipulation is required within nesting habitat within 4 miles of leks. Main roads used to transport production and/or waste products must be more than 1.9 miles from the perimeter of occupied grouse leks. Other roads used for access or maintenance must be more than 0.6 miles from the perimeter of occupied leks. Noise levels at the perimeter of a lek should not exceed 10 dBA above ambient noise from 6 pm to 8 am, so as not to disturb breeding activities (March 1 - May 15). Finally, proponents of new projects are expected to coordinate with the permitting agency and WGFD biologists to determine which leks need to be monitored and what data should be collected/reported. The Executive Order clearly identifies thresholds and outline adaptive management responses if declines in sage-grouse numbers occur14. However, in non-core areas, the EO recommends a 2-mile seasonal buffer around occupied leks and a 0.25 mile NSO buffer around active leks. Research has shown that the latter stipulation is inadequate and scientifically without merit. In addition, a surface disturbance cap is lacking from non-core area stipulations	WY	Both	emc0089RM
202.	iii. Strong components of Wyoming's approach For transmission lines, 2-mile wide transmission corridors have been identified in an effort to collocate disturbances. Construction is prohibited between March 15 and June 30 (or between December 1 and June 30 in winter concentration areas) and within 0.5 miles on either side of the existing transmission lines. If new lines are proposed for core area, they must be either buried or outfitted with raptor per deterrents to minimize avian predation pressure on sage-grouse.	WY	Both	emc0089RM
203.	It is also of great concern that areas with impending oil and gas leases in Wyoming were often purposefully excluded from Core Area mapping. Oil and gas, geothermal leases, and wind and other rights-of-way are being gobbled up by industry and speculators across the West – including in areas that to date have had very little oil and gas or other energy development. Agencies must provide a map of all existing leases/rights-of-way – so the public and decision makers can understand the very large numbers of these leases that are held. Agencies must also provide detailed maps of additional areas where leasing is foreseeable. The same must be done for mining. This is necessary to understand the huge number of leases and claims that currently exist. In many areas of Nevada, for example, there is hardly an acre that does not have mine claims, and increasingly does not have geothermal or oil and gas leases. And we wonder - can multiple kinds of leases occur, one on top of another, in the same landscapes?	WY	Both	emc0411GB

Table C-11.B
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	A supporting reason to ask for an additional 60 days is the lack of promised sage grouse priority habitat maps so that the stakeholders using public lands will know which areas may be impacted by any proposed actions by the BLM.		Both	rmc0027GB
2.	Are there any programs that we can get in on our private land to help with the grouse, this may help with the Forest Service lease if we get our private land in a management program.	All	USFS	cfc0023RM
3.	In Malheur Co, Oregon lots of the "stable" populations of sage-grouse are on private land. Take notes on what is being done in those areas that has been successful. These are probably areas with healthy ecosystems: variety of plant species, grazed by cattle but not where it hurts the grass population, fenced areas, limited hunting, variety of activities (cropping, grazing), predator control.	All	Both	cfc0031GB
4.	Whenever the RMP considers a course of action that could reduce the economic viability of a ranch, it should also consider whether that course of action would harm sage grouse by increasing the likelihood that the ranch would plow prairie, overgraze, or sell land to developers to compensate for the lost revenue.	All	Both	emc0013RM
5.	We are also concerned about the impact the management plan could have on private property rights of local farmers and ranchers. Private land and state land is often contiguous to BLM lands. If the management plan and EIS creates buffer zones around the BLM lands, you will be infringing upon the rights of private property owners.	All	BLM	emc0024RM
6.	And in spite of some incentive programs for private land habitat preservation through the NRCS and other sources, private land owners will ultimately need to manage their land for profit and in many cases that will be to the detriment of sage habitat.	All	Both	emc0058GB
7.	I question whether FWS knows what regulations would be efficacious, but the litigants are sure to force regulations that will lead to the demise of public land grazing and the private stewards that provide the hands on manage of federal lands in the west. The extremists promote a no management agenda which relieves them of any management responsibility or consequences.	All	Both	emc0070GB
8.	Much of the rangeland in sagebrush habitat is made up of intermingled ownerships fashioned into functional grazing units via the Taylor Grazing Act and more recently NRCS programs. The management of these lands can only be successful if the private landowner is included. They have the work ethic, the physical contact with the land, the knowledge of site specificity, the longevity and ability to work a management plan, and can serve as a vehicle to secure many kinds of funding that the federal government is not eligible for as a single entity.	All	Both	emc0070GB
9.	BLM recognized the need to address mixed estate ownership in its December 2011, "Report on National Greater-Sage Grouse Conservation Measures" (Report). That Report proposes exceptions to closing leasing in mixed ownership lands containing priority habitats specifically in cases where land ownership is inconsistent section-by-section resulting in a "checkerboard" ownership pattern. Anadarko owns mineral and surface use interests in such checkerboard areas. Anadarko therefore recommends that in areas of mixed ownership reasonable exceptions are provided to conservation measures.	All	Both	emc0125RM
10.	Recognition of the challenging resource management aspect of mixed ownership is also stated in BLM's document Winning Challenges o/the Future -A Road Map to Success in 2016 (BLM 2010). BLM notes: "Our checkerboard landscape and management of the subsurface mineral estate that is sometimes located under different surface owners has integrated managing and mitigating necessary impacts and, ultimately, good communication into everything we do."	All	Both	emc0125RM

Table C-11.B
Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	The document continues: "Mitigation measures will need to be coordinated based on resource impacts, rather than land ownership." Consistent with the above tenets, Anadarko requests that BLM not limit our company to only providing scoping or NEP A document comments, but more fully engage mineral owners in these proposed land management changes. As the planning process progresses, a productive on-going dialogue with the mineral and surface use owners on the checkerboard lands is essential.			
11.	As private land owners we provide important habitat for sage grouse on private lands adjacent to the BLM and FS grounds where we also graze our cattle. We have an active, sage grouse plan and are implementing projects to improve their habitat within our operation.	All	Both	emc0127GB
12.	Work with Private Land Owners on Individual area concerns, not on a National one size fits all approach.	All	Both	emc0137GB
13.	The maps that show the priority habitat appear to have incorporated private lands that are adjacent to BLM lands that have sage-grouse habitat. Many of the private lands are agricultural lands that are not and will not be sage brush/sage-grouse habitat. Is BLM going to refine its habitat boundaries and remove the private lands that are within the priority habitat boundaries?	All	Both	emc0140RM
14.	There needs to be mechanisms (funding, conservation easements, management plan conditions, technical assistance and consulting) to ensure that private lands are managed consistent with protections for sagebrush obligate species over the long term.	All	Both	emc0169GB
15.	C. While BLM acknowledges that private landowners or administrators play an important role in managing wildlife and habitat, BLM does not provide for coordination and cooperation with landoWllers beyond that afforded to the general public. The site specific on ground knowledge and often historic knowledge oflandowners should carry a very high value throughout this process. This is especially true in some areas (e.g. Owyhee County) where so much of the highest value water and meadow habitat are located on private land used by ranchers in conjunction with the public lands.	All	BLM	emc0212GB
16.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations. Wildlife populations including Greater sagegrouse benefit from the productivity of these private lands.	All	Both	emc0215GB
17.	Every effort should be made to consolidate public lands and reduce the checkerboard situation caused by the railroad. Isolated parcels that have no public access should also be reduced. Efforts should be made to trade or sell BLM controlled property that is isolated and mixed with private property.	All	Both	emc0217GB
18.	Pursuant to the Federal Land POlicy Management Act (FLPMA), all BLM actions, such as authorization of Resource J Management Plans, are "subject to valid existing rights." 43 U.S.C. § 1701 note (h); see a/50 43 C.F.R. § 1610.S-3(b) (BLM is required to recognize valid existing lease rights). Thus, pursuant to federal statute, the BLM cannot terminate, modify, or alter any valid or existing property rights through a RMP amendment. Id.	All	BLM	emc0246GB
19.	We are concerned about including private lands into the 3% calculation for disturbance in priority habitats. Many of the private lands will have disturbances and management of sage brush habitat that will skew the 3% calculation and reduce the allowed disturbance on federal land designated as priority habitat	All	Both	emc0246GB

Table C-11.B
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
20.	As discussed previously, economically viable coal reserves are not mobile and as such the imposition of restrictive buffer zones or creation of "no disturbance" corridors will likely lead to unanticipated negative Impacts on Greater Sage Grouse populations. The most likely manifestation of this condition would probably be in the form of large private land holdings being divested by energy development companies to urban development interests. Colowyo does not believe this scenario would be isolated to industry private landholders but would also manifest itself within the agricultural community as well if the ability to economically utilize public lands in concert with their private land is curtailed.	All	Both	emc0270GB
21.	unanticipated negative impacts on Greater Sage Grouse populations. The most likely manifestation of this condition would probably be in the form of large private land holdings being divested by energy development companies to urban development interests. Colowyo does not believe this scenario would be isolated to industry private landholders but would also manifest itself within the agricultural community as well if the ability to economically utilize public lands in concert with their private land is curtailed.	All	Both	emc0270GB
22.	The BLM allotments and associated private lands in sagebrush country provide habitat for diverse wildlife species as well as providing the economic base for these rural counties.	All	Both	emc0281GB
23.	One major loss should public lands grazing be curtailed, for example, would be the open space provided by private ranch lands, which is critical to greater sage-grouse habitat. Every federal grazing allotment in the west is held by a rancher who owns accompanying private "base" property. In fact, these ranchers own nearly120 million acres of primarily rangeland, west-wide. Most of these ranchers' ability to stay in business is dependent on their ability to continue grazing public lands. The unintended consequences of decisions that negatively impact those ranchers will also impact the greater sage-grouse, by encouraging the conversion of private rangelands into farmland, urban development, or other uses not conducive to greater sage-grouse habitat.	All	Both	emc0284GB
24.	Suggest that –Page 28 – 31. The wording should include evidence that governmental agencies involved with the management and conservation of the sage-grouse, are seeking and will embrace the cooperative work and knowledge currently held with the private land owner adjacent to these priority habitat areas. As stated in #5 pages 30 – 31, 31% of the land ownership is in the hands of private land owners.	All	Both	emc0291GB, emc0055RM, emc0119RM
25.	It is also very likely that the increasing suburbanization of many areas in the Grer.t Basin, with the complete habitat destruction that suburbanization creates, has a highly negative effect on nearby populations of sage grouse. This problem, however, is not one that the BLM can solve.	All	Both	emc0301GB
26.	In several places in BLMs supporting documentation and associated materials for the EIS it is stated that conservation measures would be applied regardless of surface ownership. Conservation measures applied to private lands is of great concern to the industry. The EIS and alternatives must fully address and describe how such a policy will be applied and the associated impacts, including cumulative impacts.	All	Both	emc0310GB
27.	The EIS must address how BLM and the USFS plan to honor the valid existing rights companies hold I within what is now and may be in the future designated Priority Habitat Areas.	All	Both	emc0310GB
28.	We request that BLM clarify whether private and state lands will be included in the density restriction calculations and whether the four mile NSO buffer is from the center or the edge of the lek and whether the restrictions apply to historic or active leks, or both.	All	BLM	emc0312GB

Table C-11.B
Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
29.	Private landowners, in cooperation with public land management agencies, continue to work cooperatively, to maintain, restore or enhance ecosystem functioning and management on a landscape-scale, which will provide sage grouse optimal life cycle habitat conditions. Private landowners are critical to the condition of all rangeland habitats, and therefore to sage grouse and other associated species, healthy working and economic environments for the ranching communities are imperative.	All	Both	emc0314GB
30.	Provide protection for private and public landowners to deter possible major transformation if sage-grouse are listed.	All	Both	emc0314GB
31.	Provide methods to secure that longevity, and healthfulness of the ranching industry. Agreements, easements, cooperative projects, and funding for necessary infrastructure with the agencies should be available.	All	Both	emc0314GB
32.	About including private lands into the 3% calculation for disturbance in priority habitats. Many of the private lands will have disturbances and management of sage brush habitat that will skew the 3% calculation and reduce the allowed disturbance on federal land designated as priority habitat	All	Both	emc0319GB
33.	VI. The EIS Must Evaluate Ways to Minimize Adversely Affecting Private Property Rights Federal land management agencies must properly define and protect valid existing rights as part of their planning processes. A number of the conservation measures and regulatory mechanisms recommended in the NTT Report have significant potential to diminish landowners' rights to develop their private property. The EIS must evaluate ways to minimize interfering with private property rights – including the rights associated with owning patented mining claims and fee mineral estates. BLM's proposal to recognize Valid Existing Rights (VERs) on valid claims (e.g., claims with a discovery of a valuable mineral deposit) does not go far enough to protect the property rights associated with patented mining claims and fee land because it restricts the analysis of the VERs to the four corners of a patented mining claim or the boundaries of the fee land. Instead, BLM and USFS must evaluate the substantially adverse consequences of making it impossible to develop private lands if the adjacent unpatented mining claims without a discovery are withdrawn from development. Similarly, if public lands needed for ROWs for roads, power lines, pipelines, etc. are no longer available for development, the patented claims, fee lands, and associated private property rights could be rendered worthless.	All	Both	emc0321GB
34.	VII. The EIS Must Evaluate Ways to Minimize Adversely Affecting Private Property Rights The land use restrictions, prohibitions, and withdrawals recommended in the NTT Report have significant potential to diminish landowners' rights to develop their private property. The EIS must evaluate ways to minimize interfering with private property rights - including the rights associated with owning patented mining claims and fee mineral estates. BLM's proposal to recognize Valid Existing Rights ("VERs") on valid claims (e.g., claims with a discovery of a valuable mineral deposit) does not go far enough to protect the property rights associated with patented mining claims and fee land because it restricts the analysis of the VERs to the four comers of a patented mining claim or the boundaries of the fee land. Instead, BLM and USFS must evaluate the substantially adverse consequences of making it impossible to develop private lands if the adjacent unpatented mining claims without a discovery are withdrawn from development. Similarly, if public lands needed for ROWs for roads, powerlines, pipelines, etc. are no longer available for development, the patented claims, fee lands, and associated private property lights could be rendered worthless. • Eureka Moly Scoping Issue No.7: Minimize Impacts to Private Property Rights - The EIS documents must evaluate alternatives that minimize adverse impacts to private property rights and disclose and quantify any adverse effects to property rights that would result	All	Both	emc0335GB

Table C-11.B
Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	from implementation of the Agency Preferred Alternative.			
35.	The legal rights of adequate access to private property and use must be recognized and protected as part of the Sage Grouse SEIS.	All	Both	emc0342GB
36.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - the effects of fencing, power lines, road fragmentation, and disturbance from human dwellings and activities associated with exurban development render much of it inhospitable to sage grouse	All	Both	emc0343GB
37.	The proposed conservation measures assume that non-federal land management (private or state lands) is inferior to federal land management. This view is contrary to what has been espoused as the "new paradigm" of cooperative conservation (and is in fact reflected in a recent FWS solicitation for public comments on the subject of incentives for voluntary conservation actions under the ESA, at Federal Register Volume 77, Number 51 (Thursday, March 15, 2012) at Pages 15352-15354. The transfer of private lands to federal ownership also reduces the property tax base, thus impacting local communities.	All	BLM	emc0346GB
38.	These property rights are entitled to the full protections of the Fifth Amendment to the Constitution, which provides that no person shall "be deprived oflife, liberty, or property, without due process oflaw; nor shall private property be taken for public use, without just compensation." Such protection of private property is one of the most essential and fundamental roles of government. To wantonly disregard it in the name of an expedient protection of the Sage Grouse and its habitat is a gross affront to our founding principles.	All	Both	emc0347GB
39.	As a result of this clear contradiction between the proposed plan and basic Constitutional principles, I request that in the preparation of the final plan, the Bureau make appropriate changes necessary to ensure that private property rights are not trampled upon in the pursuit of your objectives.	All	Both	emc0347GB
40.	While evaluating the ramifications of possible curtailment of livestock grazing use, consideration should take into account the linkage between private ranch lands and federal land permits. Although we don't agree with the perspective that curtailment of properly-managed livestock grazing will have a beneficial result, we do want to stress the potential negative consequences for GSG habitat on private lands, if a livestock grazing permit is not allowed to be used. In order to maintain business operations, possible conversion of private land holdings may result from not being able to make use of federally-managed lands. More intensive land use of these private resources could result in a negative outcome for habitat located on private land. In areas where private lands and federally-managed lands are found in alternating sections (i.e., "checkerboard" lands) or where private lands make up a significant portion of large tracts of habitat, this increase in fragmentation would undoubtedly be far more of a problem and impact on GSG.	All	Both	emc0383GB
41.	I believe that habitat plans should be site specific and not a state wide blanketed plan. We have already have had and are in the middle of Sage Grouse habitat vegetation projects on public and private lands in our allotment and county. A lot of private land in this area has some preferred use for Sage Grouse, taking livestock off the public range will result in over use of the private which in some areas more preferred to the Sage Grouse.	All	Both	emc0389GB
42.	Preserving access to lands, both public and private, for those users without unnecessary restrictions due to the potential listing of a species with such a large habitat fosters this stewardship.	All	Both	emc0396GB

Table C-11.B
Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
43.	It must reflect varying availabilitles of private land	All	Both	emc0407GB
44.	Additional Compensatory Mitigation Program Recommendations The Nature Conservancy recommends acquisition of suitable et"tA-" private lands of the size and quality needed to meet mitigation offset requirements for ecological impacts on BLM or USFS administered lands as the first strategy for accomplishing off-site mitigation	All	Both	emc0407GB
45.	Concomi tantly, endowments should be established to provide sufficient funding for the long-term management and monitoring of private lands acquired as mitigation to address ecological impacts on BLM or USFS-administered lands. These acquired lands should also be clearly designated as withdrawn from other uses and for the sole purpose (and use) of conserving Greater Sage-Grouse, via immediate revision or amendment to the relevant RMP or LMP.	All	Both	emc0407GB
46.	It is undoubtedly true that many private lessees hold grazing permits on federal lands which function as integral parts of private ranches and must be managed on a collective basis across both private and federal lands. This cooperation should be focused in geographic areas that are considered Priority Habitat or core areas by BLM and USFS and that are priorities for SGI.	All	Both	emc0407GB
47.	Split-estate. How will BLM address impacts of split estate development to public surface status lands and resources - for example to aquifers that may supply waters for springs critical to sage-grouse brood rearing habitat? The wording of the Scoping notice is confusing. Agencies must be honest about the true impacts of activities authorized on split estate lands- like fracking on private lands, gold mining aquifer drawdown of brood rearing habitat, noise intrusion from compressors, visual intrusions of development activity and many other adverse effects. BLM must also make sure it does not shift impacts to enable development to sites important to the sage-grouse population - whether it is split estate, or not. Indirect, cumulative and synergistic adverse impacts of activities on split-estate lands must be considered. There are serious pollution, contamination, water table depletion and other adverse impacts of energy and other developments to people, too. How will BLM consider the direct, indirect and cumulative adverse impacts of activities occurring on private, state, FWS, Bureau of Reclamation, military, or other lands in sagebrush habitats in this process?	All	BLM	emc0411GB
48.	BLM will, in reality, be unable to control development on private lands. So it is hard to understand why BLM lumped private land development in with BLM development. The NTT's wording has antagonized private landowners. Perhaps that is its intention. Stir up resistance to sage-grouse listing by making private landowners angry. Is this too part of the Core Model from Wyoming –-perhaps with split estate mineral development in mind?	All	BLM	emc0411GB
49.	Agencies must focus strongly on public land for mitigation, and outright purchase of private lands. Throwing large sums of money at conservation easements on private lands provides little acreage for great expense. Outright purchase of private lands should be pursued, rather than paying ranchers or other parties who had no intention of developing condos in an area not under threat of condo development millions of dollars not to develop condos for a conservation easement. Under the terms of most conservation easements, status quo grazing disturbance and land and watershed degradation, harmful fences, harmful management schemes, lethal predator control, and other activities continue unabated all the while on the conservation easement.	All	Both	emc0411GB
50.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following	All	Both	flb0000gb

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Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	conservation measures in the relevant Resource Management Plans and Land Management Plans- No new fences, power lines, pipelines, roads, motorized trails, communications towers, water developments, or other infrastructure should be permitted in priority sage-grouse habitat.			
51.	One has to consider that public lands are likely the only place where sage grouse will have a chance to survive. Private land owners are going to do what they need with their lands to make a profit and taking into consideration the needs of sage grouse are unlikely to be top priority.	All	Both	flb0045gb
52.	Any EIS or SEIS must also explicitly recognize the following points: In the Great Basin, and much of the western United States, livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that make public lands grazing economically unsustainable will not only negatively impact individual ranch owners, but also entire rural communities that largely depend on ranching to maintain businesses and tax base.	All	Both	fli0000gb
53.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations.	All	Both	flj0001gb
54.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations. Private land productivity, particularly wet meadow maintenance, is extremely important to sage-grouse survivability.	All	Both	flj0003gb
55.	(18) Very little to no discussion has been made on management practices to be prescribed on BLM/ USFS lands that are isolated and surrounded by private lands. These isolated parcels have frequently been described as; "custodial range)' whereupon the agencies, In (he past, have been reluctant to impose overly restrictive tet111S on grazing permits. Will this policy remain in place in the future'!	All	Both	fxc0011gb
56.	19) BLM must consider the affect increased grazing restrictions on public land will have on management of private land. In numerous cases, public land use restrictions result in increased use of private land. Such shift-to-use often times results in less favorable overall conditions for sage grouse and will effectively negate "landscape scale" planning efforts.	All	BLM	fxc0011gb
57.	We believe the management of federal lands must provide for both sage-grouse and livestock grazing as well as be made compatible with people and other resource uses. The large acreage ranching/farming operations are essential to protect sage grouse habitat from land use changes, such as housing developments. That means grazing permits must continue to be issued that enhance the economic viability of these livestock operations. This county and our neighboring county have seen small, often marginal ranch operations converted to second homes and other uses that destroyed critical habitat or enhanced predator opportunities resulting in substantial reductions in all wildlife numbers. It is extremely important that this interspersed ranchland holding foster grazing use and retention of ownerships that supports sage-grouse and the ecosystem they use. Our county has a limited private land tax base. The retention of economically viable operations such as ranching and forestry operation are far less costly to the county than the infrastructure and the safety and support facilities that come from second home and other such developments. In order to provide information and interact with the agencies as this program goes forward we would like to be granted coordinating government to government status.	All	Both	rmc0032GB

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58.	Regulations must foster a need for ranchers that can provide the needed space and defense against fire and invasive species. Without the integrated large private holdings the impacts would be much more detrimental.	All	Both	rmc0032gb
59.	The 2010 Conservation Measures also seek to address urbanization of private lands with management standards taken on adjacent public lands, which could result in significant costs and closures to areas where public lands are simply insufficient in size to provide quality grouse habitat.	All	Both	rmc0033GB
60.	The findings of the Colorado Department of Wildlife research indicate that Urbanization of grouse habitat is a significant issue in certain areas, and this issue simply is not directly addressed in the Conservation Measures. Rather the impact of Urbanization is classified as many other issues in the Conservation measures. Researchers have consistently found: "Development in the Gunnison Basin is becoming increasingly exurban. This type of development results in a highly fragmented landscape as the number of roads and buildings (Theobald et al. 1996, Mitchell et al. 2002) in previously contiguous patches of sagebrush increases, clearly reducing nesting habitat quality for Gunnison sage-grouse. High density residential development was avoided at a landscape scale, and nesting females chose to place nests farther away from any single development at the patch scale. This avoidance was not linear, with a threshold at approximately 2.5 km (Fig. Sf). The joint effects of roads and residential developments within sagebrush habitats will have negative consequences on Gunnison sage-grouse nesting habitat. With future developments on the horizon for the Gunnison Basin, housing and associated road developments within 2.5 km of identified crucial habitat should be evaluated cautiously, due to the potential direct and functional loss of nesting habitat" While Urbanization of Sage Grouse habitat is a significant concern, excluding all uses on federal lands in areas that are designated grouse habitat simply will not counter the impacts of Urbanization on adjacent private lands. Management of development of private lands is not a federal public lands management issue, it is a local zoning issue. The Organizations have to note that development of accurate zoning regulations, in partnership with local governments, simply is never addressed in the Conservation Measures, despite the fact that zoning regulations are specifically developed to address these type of issues on private lands. Excluding public access to public lands will undermine public support for the management proposal and objectives in the long run and directly contradict mitigation activities taken through public/private partnerships or attempts to manage private land development with zoning regulations. In certain areas, these public/private partnership tools will play a key role in protecting grouse habitat. The Organizations believe management of federal lands must have flexibility to address local management issues and to allow flexibility to maintain activities already developed at significant expense to the agency, such as visitor centers, bathrooms, camping facilities, and kiosks.	All	Both	rmc0033GB
61.	review of Colorado Department of Wildlife research regarding comparative levels of ownership of grouse habitat in Colorado identifies significant portions of the designated habitat where achieving compliance with this standard will be problematic given the low percentages of public lands owned, such as the habitat around Meeker, Colorado. The comparatively low levels of federal land ownership is evidenced in other grouse habitat areas as well. While only these two areas are identified in these comments, CDOW analysis finds similar comparative land ownership allocations in many areas of the state of Colorado. Department of Wildlife has taken in protecting the sage grouse. Rather than address management with absolute standards that may not be achievable, CDOW has stimulated private/public partnerships in an effort to bring more total lands into conformity with grouse management needs. The Organizations	All	Both	rmc0033GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	believe the current proposal will directly undermine these efforts and not benefit the grouse in the long run as public usage will be barred from grouse habitat but yield little true benefit to the grouse, as most usage of public lands generates little to no impact on the grouse.			
62.	Question: "Subject: Greater Sage-Grouse Habitat Management Policy on Wyoming Bureau of Land Management (BLM) Administered Public Lands Including the Federal Mineral Estate." also "and regardless of land ownership patterns. " When referring to the Federal Mineral Estate and regardless of land ownership patterns is the BLM saying that our split-estate lands will be subject to the guidelines of this document? Will the BLM or the Forest Service be dictating how, when and where we will be grazing our livestock on our private surface estate? This must be clarified immediately.	All	Both	rmc0034rm
63.	The Board encourages development and/or alteration of range improvements provided it is completed in a cooperative manner and in respect of private property rights - including water rights.	All	Both	rmc0050GB
64.	While evaluating the ramifications of possible curtailment of livestock grazing use, consideration should take into account the linkage between private lands and federal land permits. Although we don't agree with the perspective that curtailment of properly-managed livestock grazing will have a beneficial result, we do want to stress the potential negative consequences for Sage-Grouse habitat on private lands, if a livestock grazing permit is not allowed to be used. In order to maintain business operations, possible conversion of private land holdings may result from not being able to make use of federally-managed lands. More intensive land use of these private resources could result in a negative outcome for habitat located on private land. In areas where private lands and federally-managed lands are found in alternating sections or where private lands make up a significant portion of large tracts of habitat, this increase in fragmentation would undoubtedly be far more of a problem than providing for continued use of federally-managed lands.	All	Both	rmc0058GB
65.	In preparing the draft EIS, we insist that the agency document the considerations given to private property rights connected to the federally-managed lands, especially those related to livestock water rights and rights of way to access these water rights. For pending plans which seek to restrict the ability to use these private property assets, we anticipate that the draft EIS will include the required Takings Assessment as required under Executive Order 12630. Further, the documentation should include the methods by which property right owners will be compensated for planned government takings.	All	Both	rmc0058GB
66.	The interdependence of private and public lands, especially BLM, but in some instances, Forest Service is a major issue. In Shoshone Basin and other areas, sage-grouse habitat includes a mixture of BLM and private lands. Management decisions affecting BLM or Forest Service lands can directly impact management options and land uses on associated private lands. Frequently, private lands make up a majority of acres within a BLM, grazing allotment. Because private components often originated through Homesteads, water rights and associated springs and wet meadows critical to sage grouse are mostly located on private lands. Private lands usually include the deeper, more productive soils with greater potential for favorable responses to habitat management.	All	Both	rmc0063GB
67.	The NPSGWG also requests that the EIS conduct a thorough analysis of the potential impacts of applying NTT measures prioritizing sage-grouse over livestock management and structural range improvements because if measures designed to improve habitat for sage-grouse end up making it impossible for ranchers to make a living, then some of	CO	BLM	emc0060RM

Table C-11.B
Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	them may end up having to subdivide their land. Housing development scattered throughout North Park would have detrimental impacts to sage-grouse.			
68.	Production agriculture is also important in maintaining some of the late summer habitat found in irrigated hay meadows and other moist areas. The agricultural producers in North Park are effectively maintaining sage-grouse habitat by keeping the vast majority of North Park undeveloped. We would request thorough analysis of the impacts of removing production agriculture on the overall quantity and quality of sage-grouse habitat.	CO	BLM	emc0060RM
69.	The North Eagle/South Routt habitat map needs to be re-defined. A large percentage of the area covered by priority habitat is irrigated meadows and/or private lands. If land owners are denied the ability to operate, the grouse will be the losers as more of their habitat will become fragmented by housing.	CO	Both	emc0069RM
70.	How will BLM/USFS evaluate and address threats/impacts from adjacent, off-property sites (for example residential subdivision development on private lands adjacent to BLM land)? It is unclear to CPW if it is within the scope of the PRMP to coordinate with county governments and enter into Memoranda of Understanding that require shared coordination of land use discussions and decisions when they occur across administrative boundaries in PPH and PGH areas designated in the PRMP. This type of coordination would be critical because of the high percentage of private land in NW Colorado, and within the planning boundaries of the 5 BLM Field Offices.	CO	Both	emc0072RM
71.	Energy development on private land is also a potential off-property direct and indirect threat/impact. Several large coal mines are also operating in NW Colorado on privately owned land.	CO	Both	emc0072RM
72.	It is critical for BLM to consider implementing the following technical team recommendations as minimum standards: Use available tools to increase the amount of protected habitat (e.g. retiring oil and gas leases, buying out mineral claims).	CO	BLM	fll0000RM
73.	In the Great Basin, and much of the western United States livestock operations are highly dependent upon the combined use of private and public lands. Regulatory actions that restrict use of public rangelands will negatively impact private land productivity and diversity as well as the economic viability of ranching operations. Wildlife populations including Greater sage-grouse benefit from the productivity of these private lands.	GB	Both	flj0002gb
74.	I noticed that you had the city of Salmon and Leadore included in you areas of impact or habitat, is this for real or a mapping ere, and you may want to fix your maps. Also What is the reason you have private land marked on your map, I have talked to some of the local ranchers/land owners who are not in favor of you classifying their property and possibly putting them in jeopardy with some Federal agency when they don't believe or have they seen any sage grouse on their property in the last 20-30 years plus. Just some thoughts.	IDMT	Both	emc0045GB
75.	The Group has developed a sage-grouse conservation plan for Jarbidge Planning Area, which includes the goals outlined below. We ask that the BLM consider these goals as they finalize the Sage-Grouse Planning Strategy. -Encourage cooperation between private, State, and Federal landowners	IDMT	Both	emc0158GB
76.	The Group has developed a sage-grouse conservation plan for Jarbidge Planning Area, which includes the goals outlined below. We ask that the BLM consider these goals as they finalize the Sage-Grouse Planning Strategy. -Conduct work on private land only with the landowner's cooperation	IDMT	Both	emc0158GB

Table C-11.B
Comments Related to Lands and Realty on Private Lands

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
77.	New risk factors include: -Potential threats from increasing use of rural areas for residential development	IDMT	Both	rmc0028GB
78.	Actions that reduce or minimize sage brush habitat include: -subdivisions and housing development	IDMT	Both	rmc0028GB
79.	Will it be possible for a land owner, to cultivate the private land in a way not compatible with the EIS plan, say for production of high protein alfalfa for overseas export; while grazing cattle in another county on their allotment and still be EXEMPT? An example would be the ZX Ranch in Lake County. In general it is very poor policy indeed that begins by arbitrarily EXEMPTING some activity from a holistic Mitigation Plan. I recommend the grazing operation exemption either be eliminated from the EIS; or all mining and permitting operations and recreation modes not identified in the EIS be exempted from the Mitigation Plan as well.	OR	Both	rmc0036GB
80.	BLM and Forest lands should not be expected to provide all needed sage-grouse habitat to meet such benchmarks. Private, state and tribal lands contribute a good share of sage-grouse habitat now and will continue to do so in the future. The State of Utah, in consultation with Uintah County, and private land owners have taken great strides to enhance sage-grouse habitat in the Diamond Mountain area, recognizing that this is not a marginal or insupportably small sage-grouse population.	UT	Both	emc0376GB
81.	It would be much more efficient if the BLM would also sell isolated parcels to the public with the lease holder and /or neighboring land owners having final bid rights to purchase the land. Isolated parcels are not manageable for the federal agency, land sales would give them more money for managing the land they do have and selling isolated parcels would allow the neighboring landowners and or lease holder to buy something that would work within their operations. Selling isolated parcels would be a win-win for everyone. A neighboring landowner might be willing to trade ownership for land of equal or greater appraisal if it fit into their management operation better. The checkerboard pattern makes it very difficult for all involved to manage effectively.	WY	BLM	emc0050RM
82.	Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership. (Page 7 National) The BLM does not have constitutional authority to dictate to private landowners how they will manage their private land. The BLM needs to do what they can to make their federally managed lands better. The whole landscape can be viewed but not dictated to. Communication is the key here to let the landowner know of any concerns across the fence upon federally managed lands.	WY	BLM	emc0050RM
83.	Maintain retirement of grazing privileges as an option in priority sage-grouse areas when base property is transferred or the current permittee is willing to retire grazing on all or part of an allotment (Crawford et al. 2004 page 17 National) People buy base property with the expectation that the grazing leases will follow the land. The new purchaser should have the option to use the grazing lease and if they decline and the land in question is part of a grazing association then the grazing lease must go to the association for others to use. Grazing is not a privilege but a federally mandated right as part of multiple use of federally managed lands.	WY	Both	emc0050RM
84.	Factors such as vegetation management, fire management, conflicting wildlife management, predation, subdivision and infrastructure development, and invasive plants are a higher priority in the Upper Snake River Basin Conservation Area (USRBCA) and include large areas that could be affected by project actions.	WY	USFS	emc0144RM

Table C-12
Comments Related to Special Management Areas

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	There needs to be a study done comparing Wilderness habitat and multiple use habitat to compare grouse population.	All	Both	cfc0007GB
2.	The fourth problem is wilderness. If we keep making wilderness, making it harder for people to use the land we just won't care anymore.	All	Both	emc0031GB
3.	Conduct under burns in the pine and fir stands to reduce the fuel load within the Mt. Dome Area of Critical Environmental Concern. This will aid in preventing catastrophic fires on the mountain top and losing the entire stand of timber used by nesting and wintering Bald Eagles in the Klamath and Tule Lake basins.	All	Both	emc0061GB
4.	We suggest the BLM make full use of the land use categories available to it, such as wilderness recommendations and areas of critical environmental concern.	All	Both	emc0068GB
5.	Ideally, BLM should designate all of the area within the 75% core areas delineated by Doherty et al. (2011), plus any additional seasonal habitats that are needed to protect 75% of the existing population, as ACECs that are set-aside from all threats with potential to negatively impact greater sage-grouse populations, and managed to permanently maintain and enhance populations. In states with small, peripheral populations, BLM should designate ACECs to include the area needed to protect 100% of the population (100% cores delineated by Doherty et al. (2011) plus any additional seasonal habitats used by the population). The Dakotas and Utah, as well as parts of Colorado, include these small, isolated populations where sage-grouse population are particularly vulnerable to extirpation. However, we recognize that legal, social and political factors (particularly around energy development), may make this difficult for BLM to achieve across the entire eastern/Rocky Mountain range.	All	Both	emc0089RM
6.	I would like to see some land protection measures, though not necessarily wilderness, which precludes management. But I strongly oppose efforts to remove current wilderness study areas from that designation at this time. I believe those efforts are aimed at opening these wild lands that benefit so many people and wildlife to development that would forever destroy their character and value.	All	Both	emc0107GB
7.	16) Comment: Areas of Critical Environmental Concern designations. ! Planning guidance explicit to the consideration of such ACECs in RMP/EIS development should be provided. The only mention I found of ACECs in the Strategy, Charter, or NTT Report is in the Plan of Operations definition in the NTT Report, and it has nothing to do with addressing the suitability of designating sage-grouse or sagebrush ACECs in RMPs. I have previously advocated designating large tracts of sage-grouse habitat as ACECs, in some cases spanning planning unit, field office, and/or state boundaries. Section 202(c)3 of FLPMA stipulates: " (c) In the development and revision of land use plans, the Secretary shall --- (3) give priority to the designation and protection of areas of critical environmental concern; ...". The FLPMA language does not constrain such designations to within one planning unit or one state.	All	BLM	emc0113GB
8.	As a part of the planning process the BLM scoping notice invites the public "to nominate or recommend areas on public lands for greater sage-grouse and their habitat to be considered as Areas of Critical Environmental Concern [ACEC]" 76 Fed. Reg. 77011. WWF encourages the BLM to continue analyzing proposed ACECs as better mapping of sage-grouse habitat is made available from each state.	All	Both	emc0128RM
9.	ACECs should encompass priority habitat including breeding, late-brood rearing, and winter concentration areas, and migration and connectivity corridors.	All	Both	emc0128RM

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10.	WWF encourages the BLM to consider ACEC designations incorporating the following criteria: - Coordinate with the Wyoming Game and Fish Commission to transition any commission owned Wildlife Habitat Management Areas with high sage-grouse habitat values to ACECs. - Coordinate with the Wyoming Game and Fish Department to identify those areas within sagegrouse core areas that are most crucial and should be designated ACEC - Evaluate areas with high biological value and are currently undeveloped, have a low potential for energy development, and do not contain existing leases. - Consider areas with lower biological values and are currently undeveloped, have a low potential for energy development, and do not contain existing leases. These areas could be used maintain connectivity both between core regions and adjacent states. Additionally BLM could work to improve the value of this habitat for sage-grouse.	All	Both	emc0128RM
11.	Wilderness Characteristics: All public lands which exhibited wilderness characteristics have been designated as such by Congress. No further lands should be incorporated into the Wilderness System. The same holds true for all special designations. All land not already designated as a special use area by Congress should be returned to multiple-use and managed as such for the good of the Nation.	All	Both	emc0133GB
12.	Revisions to greater sage-grouse management plans should not be used to elevate "wilderness characteristics" above all other multiple uses. Multiple use of federal lands is mandated under the Federal Land Policy and Management Act of 1976 (FLPMA) and other statutes. Only Congress, by designating Wilderness Areas and Wilderness Study Areas-Inventoried Roadless Areas (WSAs-IRAs) under discrete authority of the Wilderness Act of 1964, may elevate the importance of "wilderness characteristics."	All	Both	emc0140RM
13.	Areas of Critical Environmental Concern The NOI invites the public "to nominate or recommend areas on public lands for greater sage-grouse and their habitat to be considered as ACEC as part of this planning process." Similarly to the PPH and PGH comments above, we believe public notice and opportunity for comment should be required before any such areas are designated.	All	Both	emc0140RM
14.	The similarity between wilderness regulatory restrictions and the rules proposed to protect sage grouse, and the ability of existing wilderness areas to provide for the minimum sustainable populations of sage-grouse (a total of 5,000 birds) is an issue that needs to be evaluated.	All	Both	emc0160GB
15.	When it comes to a conflict between a potential endangered specie and land with wilderness characteristics, the perches need to be cut. It is very disappointing as a rancher to pay for the labor to provide off-site watering for cattle, only to find that the perches around the targeted playas carmot be SMA removed due to the land having wilderness characteristics	All	Both	emc0172GB
16.	As a side note, on the maps of sage grouse habitat, I noticed that there were no wilderness areas or wilderness study areas included that I was familiar with.	All	Both	emc0172GB
17.	Public lands (especially BLM property) should be managed for multiple uses. Traditional uses should get priority over newer uses such as ATV trails and wilderness designation. National Parks and National Forests should be managed for fewer activities and can be set aside for Wilderness designation.	All	Both	emc0217GB
18.	1. BLM should designate ACECs to protect important sage-grouse habitat and require robust, consistent management prescriptions. a. ACECs are an important tool to designate and protect important sage-grouse habitat areas.	All	BLM	emc0234GB
19.	Therefore, ACECs are an appropriate tool for delineating areas to be managed for sage-grouse protection, as well as for developing special management approaches for a broader suite of resources.	All	Both	emc0234GB

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20.	BLM's scoping notice invites the public "to nominate or recommend areas on public lands for greater sage-grouse and their habitat to be considered as Areas of Critical Environmental Concern as a part of this planning process." 76 Fed.Reg. 77011. We support this approach and encourage BLM to consider ACEC nominations that are submitted in response to this planning process, to develop its own proposals, and to look at ACECs that were submitted and/or previously evaluated but not designated in RMPs that will be amended by this process.	All	BLM	emc0234GB
21.	Criteria for designating ACECs to conserve and enhance priority habitat for sage-grouse should be developed consistent with the National Technical Team's recommendations and the most recent scientific research. Several draft RMPs recently released for public review and comment evaluated sage-grouse ACECs that should be considered as part of this process, including Lander (Wyoming), Bighorn Basin (Wyoming) and Colorado River Valley (Colorado). Additionally, we previously submitted ACEC nominations for the Cedar City (Utah) and Jarbidge (Idaho) RMP revisions that we believe merit evaluation as part of this process.	All	Both	emc0234GB
22.	In evaluating ACECs as part of this planning process, BLM should also consider whether there are additional, coexisting values that can be managed as part of ACECs over an overlapping area or areas. For example, the Nine Mile Canyon ACEC, designated in the Vernal RMP, is managed to protect special status species as well as scenic qualities and cultural resources (Vernal Approved RMP and ROD, p. 36). Similarly, the Fort Stanton ACEC, designated in the Roswell RMP, is managed to protect biological, archeological and scenic values (Roswell Approved RMP, p. 67). Both of these ACECs also provide recreation opportunities. We encourage BLM to designate ACECs for sage-grouse protection that provide the opportunity to manage and protect other additional values such as cultural, scenic and biological resources and backcountry recreation experiences	All	Both	emc0234GB
23.	Recommendations: BLM should designate ACECs to protect and enhance important sage-grouse habitat, considering new ACEC nominations as well as ACECs that were previously nominated and/or evaluated in affected RMPs. BLM should give careful consideration to ACECs that possess additional values that can be managed and protected commensurately with sage-grouse habitat conservation. A broader approach will fulfill FLPMA's mandate to prioritize protection and designation of ACECs and to manage the mUltiple uses of the public lands, while also making the most of this opportunity to manage the sagebrush ecosystem at a landscape level.	All	Both	emc0234GB
24.	b. BLM must ensure management prescriptions for designated ACECs are adequate to protect sage-grouse habitat and consistently applied.	All	BLM	emc0234GB
25.	If BLM intends to rely on ACEC designation for protecting and enhancing sage-grouse habitat, this planning process must establish robust, consistent management prescriptions for ACECs. As stated above, designating ACECs is one ofBLM's obligations under FLPMA. However, historically, ACEC designation has been a tool that is full of potential but frequently fails to provide appropriate protections for the relevant and important values that BLM identifies as meriting ACEC designation	All	Both	emc0234GB
26.	The BLM's ACEC Manual (1613) requires that management prescriptions for ACECs are to be "fully developed" in RMPs or amendments and sets out useful factors for consideration in developing such prescriptions (1613.22). If these factors and directions for incorporating management prescriptions into plans were followed, then ACECs might be sufficiently protected. Unfortunately, the ACEC Manual also defines the agency's mandatory requirements inadequately for actual	All	Both	emc0234GB

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	protection ofthe relevant and important resources that the BLM has identified as needing special management attention, stating: "At least one prescription for each potential ACEC must be developed which provides special management attention" (1613.22). Further, the ACEC Manual has not been updated in so long that it is not even available on BLM's Electronic Reading Room with all the other agency manuals and handbooks. As a result, the agency lacks any recent guidance on ACEC management or even on designation, and management prescriptions for ACECs may be wholly inadequate.			
27.	To ensure that ACEC designation is successful relative to this planning process and protection of relevant and important values managed by the agency more broadly, we recommend BLM issue guidance on ACEC management immediately and also begin updating the ACEC Manual. The immediate guidance should mandate that BLM develop and incorporate a basic set of key management prescriptions into plans, even if additional management may be developed through a subsequent, ACEC-specific activity plan. Both immediate guidance and an updated ACEC Manual are necessary to demonstrate the agency's commitment to protect relevant and important values through ACEC designation as required by FLPMA and to ensure that ACECs designated through this process will meaningfully protect sage-grouse habitat and other important resources.	All	Both	emc0234GB
28.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Minimization of route networks and closures to motorized use or limiting motorized use to designated routes;	All	Both	emc0234GB
29.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Mineral withdrawal, both immediate under Section 204 ofFLPMA and recommendation for permanent withdrawal (per Manual 1613.33.C);	All	Both	emc0234GB
30.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: ROW exclusion (such as electric transmission and fluid mineral pipelines	All	Both	emc0234GB
31.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Closed to renewable energy development;	All	Both	emc0234GB
32.	Specific management prescriptions that should be mandatory for ACECs designated for sage-grouse protection should include, at a minimum: Closed to leasing or NSO with no exceptions, modifications or waivers.	All	Both	emc0234GB
33.	Recommendations: This planning process must establish specific, mandatory management prescriptions for ACECs designated to protect and enhance sage-grouse habitat. BLM should issue an Instruction Memorandum and/or other guidance immediately that details the agency's requirements and expectations for ACEC management, and should also update the ACEC Manual to reflect updated management requirements and ensure this tool adequately protects the important and relevant values it is intended to safeguard.	All	Both	emc0234GB
34.	2. BLM should inventory lands with wilderness characteristics as part ofthis planning process and consider protecting inventoried lands to benefit sage-grouse. a. FLPMA and BLM's current guidance require the agency to inventory lands for wilderness characteristics in major planning efforts	All	Both	emc0234GB
35.	BLM's mandate of multiple use and sustained yield, as well as other relevant law and the agency's current guidance, provide for inventory and protection of wilderness values, which should also form a part of this land use planning process.	All	Both	emc0234GB

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36.	Wilderness character is a resource for which BLM must keep a current inventory and must address in land use planning. As the U.S. Court of Appeals for the Ninth Circuit held: ... wilderness characteristics are among the 'resource and other values' of the public lands to be inventoried under § 1711. BLM's land use plans, which provide for the management of these resources and values, are, again, to "rely, to the extent it is available, on the inventory ofthe public lands, their resources, and other values." 43 U.S.C. § 1712(c)(4). Oregon Natural Desert Ass 'n v. Bureau of Land Management, 531 F.3d 1114, 1119 (9th Cir. 2008). Therefore, BLM is required to consider "whether, and to what extent, wilderness values are now present in the planning area outside of existing WSAs and, if so, how the Plan should treat land with such values." [d. at 1143.	All	Both	emc0234GB
37.	Sage-grouse habitat clearly is a supplemental value of lands with wilderness characteristics and therefore should be evaluated as part of the inventory process	All	Both	emc0234GB
38.	Recommendations: BLM should complete wilderness characteristics inventories for the RMPs that will be amended through this planning process in compliance with IM 2011-154, and document where sage-grouse habitat is a supplemental value of an inventoried area. b. Protecting lands with wilderness characteristics can benefit sage-grouse.	All	Both	emc0234GB
39.	BLM should consider whether and how protecting lands with wilderness characteristics woulJ contribute to protecting and recovering sage-grouse, and those potential benefits should influence BLM's decision to protect inventoried lands with wilderness characteristics (LWCs).	All	Both	emc0234GB
40.	Furthermore, Wilderness Study Areas may provide important intact habitat for sage-grouse. As part of this planning process, BLM should analyze whether WSAs are or could provide crucial sage-grouse habitat and recommend those WSAs for Wilderness designation to ensure they provide enduring protection for the species.	All	Both	emc0234GB
41.	BLM should evaluate whether and how protecting inventoried lands with wilderness characteristics and WSAs can benefit sage-grouse, and use that analysis to inform decisions on managing L WCs for protection and recommending WSAs for designation.	All	Both	emc0234GB
42.	As stated in the 15-Year Strategy for the Conservation Lands, BLM will "maintain or increase habitat connectivity with other important habitat areas to provide for sustainable populations of native species." 15-Year Strategy, Goal2A(2). The Strategy also states that BLM will develop maps identifying key habitat linkages among the Conservation Lands to meet broad-scale conservation goals as well as serve as an information resource for exploring possible new designation to the Conservation Lands. 15-Year Strategy, Goa12C. These strategic actions should be directly applied to BLM's efforts to avoid listing of the sage grouse under the ESA.	All	Both	emc0234GB
43.	Ecosystem-based management ofthe Conservation Lands extends beyond the borders to the important and sensitive lands and waters that provide habitat for sage grouse and other wildlife on public lands that may not have adequate management prescriptions in place to allow for the species to survive. BLM has committed to conservation of sage grouse and its habitat and should use Conservation Lands as a tool to achieving those conservation goals and recommend the addition of more conservation areas to BLM's Conservation Lands portfolio in order to facilitate the survival of the species.	All	BLM	emc0234GB
44.	Recommendation: In order to adequately protect and recover sage-grouse populations, BLM should help protect landscapes that are either threatened by development or ecologically healthy and biologically diverse by recommending that Congress or the president use authority under law to established new conservation designations such as national	All	BLM	emc0234GB

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	monuments, wilderness areas, national conservation areas or other designations as appropriate.			
45.	Among the 15 issues covered in the joint letter, we particularly look forward to the opportunity to work with both the BLM and FS to identify important habitats and areas for special designations. Our organization has skills and expertise on sage-grouse, their habitats, and the best landscapes that deserve protection to benefit the species.	All	Both	emc0243GB
46.	and that these areas, when designated, provide clear and specific management requirements that will adequately manage, reduce or eliminate development and landuse activities that threaten the persistence of sage-grouse on the landscape.	All	Both	emc0243GB
47.	We realize the designation of ACEC's for sage grouse protection is an otion BLM has to manage in an area which meets the criteria for ACEC desi&nation. We also appreciate the additional requirement that these ACEC nominations be analyzed within the RMP amendment process so that we can provide BIM with additional input on the impacts any of these nominations may have in areas where we having value existlns rights. We request that these same ACEC nominations be analyzed within the "State IM" alternative to compare the impacts of each of these GSG protection strategies to make a "least restrictive environment" land use determination on these areas.	All	BLM	emc0246GB
48.	Samson asks that the BLM refrain from including and evaluating the Citizen's Proposed Wilderness Areas (CPWA) as wilderness for GSG habitat protection as they have not been designated by Congress as such at this time. Many of these CWPA's have active 011 and gas leases and associated exploration and production activities at this time. Acknowledging any type of wilderness deSignation within the RMP amendment process for the further protection of the GSG would not be appropriate for inclusion In any of the EIS alternatives. The focus should be kept on the GSG and should not provide an opportunity to further advance the protection of the CPWA's within the RMP amendments until Congress acts on these proposed designations.	All	BLM	emc0246GB
49.	Relevance: Criteria 2: A fish and wildlife resource (including but not limited to habitat for endangered, sensitive or threatened species, or habitat essential for maintaining species diversity). The Greater Sage-Grouse is the largest North American grouse and depends upon a variety of sage-steppe habitats during their lifecycle. In 2010, the US Fish and Wildlife Service found that the Sage-Grouse warranted listing under the Endangered Species Act in recognition of the myriad threats confronting sage-grouse populations across its range (Fed. Reg. 3/4/10). As a sagebrush obligate species, the Greater Sage-Grouse depends upon large, healthy connected stands of sagebrush for their survival and are very vulnerable to changes in habitat. Sagebrush steppe habitats are considered among the most imperiled ecosystems in North America (Knick et al. 2003, p. 612). ACEC designation is an important tool to protect priority habitats for Sage-Grouse. This nominated ACEC encompasses all core habitats within the BLM Dillon Resource Area and will contribute to the conservation of Sage-Grouse in Management Zone IV. This ACEC contains ACEC Nomination, Greater Yellowstone Coalition & Montana Audubon , March 2012 approximately fifty active and historic breeding leks as well as winter, nesting, and brood rearing habitats.	All	BLM	emc0248GB
50.	The lands nominated for ACEC designation “have substantial significance and values,” and specifically meet criteria 1-3. 1. Has more than locally significant qualities: The lands included in the proposed ACEC represent a relatively large contiguous area of high biological value for sage-grouse. These lands are largely un-developed and un-encumbered by valid existing leases (see enclosed map: “Beaverhead Headwaters/ Centennial Valley Sage Grouse Core Areas”). If managed for	All	BLM	emc0248GB

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	Sage-Grouse and the requisite plant communities needed to sustain Sage- Grouse through an ACEC designation, these lands could substantially contribute to the conservation of this sensitive and candidate species in Management Zone IV. 2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, endangered, threatened or vulnerable to adverse change: At least a portion of southwest Montana's Sage-Grouse population is migratory, moving between separate breeding areas in Montana and wintering areas in eastern Idaho (MDFWP 2005, p. 25). This unusual characteristic makes this population particularly sensitive to activities that would lead to habitat fragmentation. Sources of habitat fragmentation which could be managed through the special management attention of an ACEC include: energy exploitation and transmission; road building and season of access; ORV use; extra efforts to limit noxious weed invasions; properly designed wildfire defense plans; modification to fencing specifications and densities; and improved designs for water infrastructure. In addition, the relatively high elevations and cool temperatures of southwest Montana's priority Sage-Grouse habitats may be considered irreplaceable in that they appear to provide refugia from widespread, episodic occurrence of West Nile virus (WNv) at present, and may continue to as climate change increases temperatures. Sage-Grouse appear to have no resistance to WNv, which has caused extreme mortality events in some Sage-Grouse populations at lower elevations and warmer habitats in southeast Montana, eastern Oregon, southwest Idaho and elsewhere. In contrast, there has never been a documented infection or mortality of Sage-Grouse from WNv in Beaverhead or Madison counties, which are encompassed by this ACEC nomination. Summer temperatures likely affect WNv viremia (Naugle et al. 2005). Braust (1991) suggested a mean daily temperature below 21 C degrees reduces autogeny in Culex tarsalis, the principle mosquito vector of this virus. 3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA: The significant amount of attention paid to Greater Sage-Grouse research, monitoring, and conservation, as well as explicit statements by federal and state agencies, demonstrates that the species is a national priority. State and federal agencies have been working for over a decade to implement conservation strategies to maintain Sage-Grouse populations, as reflected in Montana's Sage-Grouse Conservation and Management Plan and the BLM Dillon Area Resource Management Plan (BLM RMP 2006). In 2010, the US Fish and Wildlife Service found that listing of the Greater Sage-Grouse was warranted due to "the present or threatened destruction, modification, or curtailment of its habitat, and the inadequacy of existing regulatory mechanisms to address such threats" (Fed. Reg. 3/4/10).			
51.	The lands nominated for ACEC designation "have substantial significance and values," and specifically meet criteria 1-3. 1. Has more than locally significant qualities: The lands included in the proposed ACEC represent a relatively large contiguous area of high biological value for sage-grouse. These lands are largely un-developed and un-encumbered by valid existing leases (see enclosed map: "Beaverhead Headwaters/ Centennial Valley Sage Grouse Core Areas"). If managed for Sage-Grouse and the requisite plant communities needed to sustain Sage- Grouse through an ACEC designation, these lands could substantially contribute to the conservation of this sensitive and candidate species in Management Zone IV. 2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, endangered, threatened or vulnerable to adverse change: At least a portion of southwest Montana's Sage-Grouse population is migratory, moving between separate breeding areas in Montana and wintering areas in eastern Idaho (MDFWP 2005, p. 25). This unusual characteristic makes this population particularly sensitive to activities that would lead to habitat fragmentation. Sources of	All	BLM	emc0248GB

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	habitat fragmentation which could be managed through the special management attention of an ACEC include: energy exploitation and transmission; road building and season of access; ORV use; extra efforts to limit noxious weed invasions; properly designed wildfire defense plans; modification to fencing specifications and densities; and improved designs for water infrastructure. In addition, the relatively high elevations and cool temperatures of southwest Montana's priority Sage-Grouse habitats may be considered irreplaceable in that they appear to provide refugia from widespread, episodic occurrence of West Nile virus (WNv) at present, and may continue to as climate change increases temperatures. Sage-Grouse appear to have no resistance to WNv, which has caused extreme mortality events in some Sage-Grouse populations at lower elevations and warmer habitats in southeast Montana, eastern Oregon, southwest Idaho and elsewhere. In contrast, there has never been a documented infection or mortality of Sage-Grouse from WNv in Beaverhead or Madison counties, which are encompassed by this ACEC nomination. Summer temperatures likely affect WNv viremia (Naugle et al. 2005). Braust (1991) suggested a mean daily temperature below 21 C degrees reduces autogeny in Culex tarsalis, the principle mosquito vector of this virus. 3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA: The significant amount of attention paid to Greater Sage-Grouse research, monitoring, and conservation, as well as explicit statements by federal and state agencies, demonstrates that the species is a national priority. State and federal agencies have been working for over a decade to implement conservation strategies to maintain Sage-Grouse populations, as reflected in Montana's Sage-Grouse Conservation and Management Plan and the BLM Dillon Area Resource Management Plan (BLM RMP 2006). In 2010, the US Fish and Wildlife Service found that listing of the Greater Sage-Grouse was warranted due to "the present or threatened destruction, modification, or curtailment of its habitat, and the inadequacy of existing regulatory mechanisms to address such threats" (Fed. Reg. 3/4/10).			
52.	Special Management Attention: To receive ACEC designation, "an area must require special management attention to protect the important and relevant values." (BLM Manual). This proposed ACEC requires management guidance so that sage-grouse conservation is the primary objective. BLM lands within the proposed ACEC can be permanently set-aside from large-scale development and managed with emphasis on maintaining and enhancing southwest Montana's Greater Sage-Grouse population.	All	BLM	emc0248GB
53.	Specifically, management prescriptions for this proposed ACEC should implement the conservation measures recommended by the Sage-Grouse National Technical Team in December, 2011 (SGNTT, 2011). Recent publications have exhaustively documented the special conservation actions needed to sustain Greater Sage-Grouse in the American West (SAB 2011). Because this proposed ACEC includes priority/core sage grouse habitat, we recommend the following special management to address activities that will fragment the sage-steppe habitats upon which the greater sage-grouse depends: 1. Fluid Minerals/ Oil and gas: The Sage-Grouse National Technical Team recommends that unleased federal fluid minerals be closed to leasing in priority sage grouse habitat. Upon expiration or termination of existing leases no new nominations/ expressions of interest should be accepted. The lands within the proposed Dillon Resource Area ACEC are almost entirely unleased (see attached map: "Beaverhead Headwaters/ Centennial Valley Sage Grouse Core Areas"). Management prescriptions for this ACEC should implement the Technical Team's recommendation, closing these lands to future leasing. This would include all of the federal mineral estate within the boundaries of the ACEC, regardless of surface land	All	BLM	emc0248GB

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	ownership. The current Dillon Resource Management Plan requires only a *and Sage-grouse* leks. More recent research reflected in the National Technical Team's report indicates that "applying NSO or other buffers around leks at any distance is unlikely to be effective. Even if this approach were to be continued, it should be noted that protecting even 75 to >80% of nesting hens would require a 4-mile buffer." SGNTT, 2011, pp 20-21). Given the current lack of interest in oil and gas within the boundaries of the proposed ACEC, special management provisions should be put in place now to protect Sage-Grouse habitat and provide for enhanced and resilient populations in southwest Montana.			
54.	Specifically, management prescriptions for this proposed ACEC should implement the conservation measures recommended by the Sage-Grouse National Technical Team in December, 2011 (SGNTT, 2011). Recent publications have exhaustively documented the special conservation actions needed to sustain Greater Sage-Grouse in the American West (SAB 2011). Because this proposed ACEC includes priority/core sage grouse habitat, we recommend the following special management to address activities that will fragment the sage-steppe habitats upon which the greater sage-grouse depends: Wildfire and fuels management: Because the proposed ACEC includes priority Sage- Grouse habitat, the Technical Team's recommendations with regard to fuels management and fire operations should be implemented within the boundaries of the ACEC (SGNTT 2011).	All	BLM	emc0248GB
55.	Specifically, management prescriptions for this proposed ACEC should implement the conservation measures recommended by the Sage-Grouse National Technical Team in December, 2011 (SGNTT, 2011). Recent publications have exhaustively documented the special conservation actions needed to sustain Greater Sage-Grouse in the American West (SAB 2011). Because this proposed ACEC includes priority/core sage grouse habitat, we recommend the following special management to address activities that will fragment the sage-steppe habitats upon which the greater sage-grouse depends: Travel management: Within the proposed ACEC, motorized recreation should be limited to designated roads and trails. The BLM should review current travel management plans and evaluate the need for permanent or seasonal road and area closures to protect Sage-Grouse (SGNTT, 2011). Roads and trails not designated for motorized recreation within the ACEC should be obliterated and restored to native vegetation to improve Sage-Grouse habitat.	All	BLM	emc0248GB
56.	Invasive Weeds: Within the boundaries of the proposed ACEC, special management is required to limit the spread of invasive weeds such as cheat grass (Bromus tectorim). Cheat grass significantly alters fire regimes, shortening fire frequencies and increasing fire intensities in ways which permanently alter the climax sagebrush vegetation Sage- Grouse require. Presently cheat grass is not classified as a "noxious weed" in Montana and as such receives no state, federal or local resources to control or limit its spread.	All	BLM	emc0248GB
57.	Structural Range improvements: Water infrastructure and fences to manage livestock can pose increased mortality risk to sage grouse. Within the boundaries of the ACEC, development or modification of water infrastructure should be done in a way that minimizes the potential propagation of West Nile virus. (SGNTT 2011). Existing and new fencing should be marked, modified or removed to reduce sage-grouse strikes and mortality, particularly near leks, in known flight paths, in concentrated winter range, or where fence strikes have been documented.	All	BLM	emc0248GB
58.	Less than 1.5% of the current GSG breeding population needs to be conserved to support a minimum effective population as high as 5,000 birds. Because the species is heavily concentrated in high-quality portions of its occupied range (see Doherty6), less than 0.25% of the total acreage in the highest breeding density portions of the occupied range needs to be	All	Both	emc0251GB

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	conserved to support the minimum effective population (see calculations in footnote 6). Likely, far more than 5,000 GSG, and more than 0.25% of the species high quality breeding habitat, are located within existing Wilderness Areas, National Wildlife Refuges, National Parks, and National Conservation Areas. Thus, these nationally designated areas likely already support more GSG than the minimum effective population needed to safeguard the species from extinction. Further, these nationally designated areas are already managed under special regulatory mechanisms that in many instances mirror the proposed mechanisms that current sage-grouse planning strategies recommend for conservation of the species and its habitat. These nationally designated areas have the potential to protect a minimum effective population of GSG under the type of regulatory mechanisms that the FWS claims will provide them with sufficient protection from human disturbances and development. Thus, the EIS process needs to first analyze greater sage-grouse population levels and trends in these nationally designated areas to determine how many GSG they contain, and the extent to which their habitats are sufficient to sustain the minimum effective population of 5,000 birds under the regulatory mechanisms that are already in place. If analysis of these nationally designated areas confirms that they currently support more than 5,000 greater sage-grouse, and demonstrates that their populations have been maintained or have increased under the regulatory mechanisms already implemented, then there is no need to implement additional conservation measures anywhere else in the bird's occupied range. In such case, the GSG does not need to be listed under the ESA because its existence and trend in these nationally designated areas alone is sufficient to safeguard it from extinction. In contrast, if analysis demonstrates that greater sage-grouse population trends in these nationally designated areas are similar to trends elsewhere in their currently occupied range, then the entire line of reasoning regarding the factors responsible for GSG population declines must be reevaluated. If GSG population declines have occurred in these nationally designated areas that received such recognition because of their expansive, wild, undisturbed characteristics, and have been largely protected from human disturbance and development since their designation, then factors other than habitat loss, destruction, and fragmentation due to man's activities must be driving the GSG population declines. Likewise, if greater sage-grouse populations have declined in these nationally designated areas despite the regulatory/policy mechanisms that constrain their use, all recommendations to implement similar regulatory restrictions across vast additional acreages of the GSG range need to be rejected entirely.			
59.	If regulatory/policy controls to minimize human disturbance have failed to allow GSG populations to flourish within the vast wilderness areas and other nationally designated conservation areas, then it is unreasonable to apply such draconian control measures to broad landscapes beyond the boundaries of these areas in the vain hope that such regulation will somehow work in other locations. To implement regulatory mechanisms that are certain to severely interfere with other valid existing uses of the landscape and negatively impact local and regional economies in the face of evidence that such mechanisms did not reverse the plight of the GSG in these nationally designated areas would be unreasonable, irrational, and counter-productive. Instead, if the minimum effective population of GSG necessary to protect the species from extinction cannot be supported within such nationally designated areas, then management practices that were in place when greater sage-grouse populations dramatically increased from the mid 1800s to early 1900s need to be identified and implemented again in other areas, including increased livestock grazing to reduce wildfire fuel loads, and concerted predator control practices	All	Both	emc0251GB
60.	No Action Alternative As discussed above, the current GSG population exceeds the minimum effective population by 70 to	All	Both	emc0251GB

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	107 times. Current GSG populations and habitats located within existing Wilderness Areas, National Wildlife Refuges, National Parks, and National Conservation Areas likely far exceed the minimums needed to safeguard the species against extinction. These nationally designated areas already impose regulatory mechanisms that mirror those that are thought to provide protections for GSG. Thus, it is likely that a well reasoned, detailed analysis of the current situation will demonstrate that no additional action is necessary because GSG do not legally qualify for listing under the ESA based upon their current population size and slow rates of change in recent times. Further, their existence and trend in existing nationally designated areas alone likely prevents the GSG from meeting the legal qualifications for listing under the ESA.			
61.	If analysis of the current situation determines that no existing habitat area(s) provide large enough interconnected habitat with sufficient management protections to support a minimum effective population as high as 5,000 interbreeding adults into the foreseeable future, the EIS process must consider alternatives to establish adequate habitat areas, such as the alternatives discussed below. Contiguous Habitat Block Alternative If it is determined that no nationally designated special areas currently provide a contiguous habitat block to support a minimum effective population as high as 5,000 breeding adults, the EIS process must evaluate the extent to which adjacent habitat could be incorporated into a special management area to establish such a habitat block. For example, if an existing wilderness area only lacks some winter habitat to provide for the year-long needs of the minimum effective population, and such winter habitat exists on nearby lands, it is entirely reasonable to develop an alternative to incorporate that adjoining winter habitat into a special management area and impose any necessary protections on such winter habitat to establish a contiguous habitat block to support the minimum effective population. If such contiguous habitat block is established to meet the needs of the minimum effective population, no additional GSG conservation measures are needed across the remainder of the species range to safeguard GSG from extinction and avoid the presumed need for listing under the ESA.	All	Both	emc0251GB
62.	Proximate Habitat Alternative If it is determined that no nationally designated special areas currently provide proximate habitats to support the free flow of genetic information among a minimum effective population as high as 5,000 breeding adults, the EIS process must evaluate the extent to which nearby habitats could be incorporated into a management network to establish such proximate habitats. For example, there may be two nationally designated areas, say a wilderness area and a wildlife refuge, that each support a population of 3,000 GSG, but are distant enough from each other to prevent the free flow of genetic information between them. Existing GSG habitat located between these areas could be managed to establish a proximate habitat network that allows the free flow of genetic information among a combined GSG population that exceeds a minimum effective population as high as 5,000 breeding adults.	All	Both	emc0251GB
63.	2) Roadless and "wilderness" areas affect all of the habitat issues negatively. Negative effects to sage grouse habitat will still be present with wilderness designation, yet the ability to address those habitat issues will be severely restricted with a wilderness designation. (I.e. Wilderness does not solve the problem, it makes it worse.)	All	Both	emc0257GB
64.	As noted elsewhere in these comments, sage-grouse typically inhabit large, interconnected expanses of sagebrush. While there is a seasonal component to their habitat requirements, sagegrouse rely year-round on sagebrush-dominated landscapes with varying sagebrush canopy covers, densities and heights, age classes, patch sizes, and moisture availability. Sage-grouse are a landscape species, meaning they use these large, ecologically diverse sagebrush-steppe habitats and are particularly vulnerable to land-use and resource-harvesting practices that alter this habitat. In 2010, the U.S. Fish and	All	Both	emc0276GB

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	Wildlife Service determined that the greater sage-grouse warranted listing under the Endangered Species Act due to past destruction and degradation of habitat, as well as ongoing threats to their remaining habitat. In particular, the Service found, based on its review of the best information available, that existing 'regulatory mechanisms'—that is, laws, regulations, strategies and guidance at the federal, state, and local levels—are inadequate to protect sage-grouse from extinction. The Service then determined that the absence of adequate regulatory mechanisms is a significant threat to the species, now and in the foreseeable future. However, the Service determined that listing at that time was precluded by higher priority listing actions. Conversion of sagebrush habitat for agriculture, intensive ranching operations (including associated fencing and water developments), invasive weeds, fires, and, oil and gas development along with the infrastructure required for that development (roads, pipelines, powerlines, etc.), have all factored significantly in sage-grouse declines. Based on these facts and the criteria noted above, GYC is nominating at a minimum two areas of land in Idaho and one area of land in Montana as ACECs for sage-grouse protection purposes. This full nominations are attached as Exhibits 1 & 2.			
65.	Areas of Critical Environmental Concern (ACECs) are an important tool to protect key areas: ACECs should be designated to protect priority habitats from development and other disturbances in each Resource Management Plan (RMP). In states with particularly precarious populations, ACECs should encompass all or a substantial proportion of remaining priority habitat and can also protect wilderness-quality lands and other species on these same lands.	All	Both	emc0297GB
66.	We are concerned however that field offices may feel compelled to include alternatives which have much higher impacts to resources other than PPH or are longer or less constructible simple because they appear to have less impact to PPH.	All	Both	emc03
67.	Administrative designations, such as Areas of Critical Environmental Concern (ACEC) and/or Research Natural Areas (RNA), should be used to protect priority sage-grouse habitat on BLM lands.	All	BLM	emc0308GB
68.	The Department of the Interior should independently consider the current amount of "protected" sage grouse habitat in existing Wilderness Areas, National Wildlife Refuges, National Parks, and National Conservation Areas to support the minimum effective Sage Grouse population. These nationally designated areas are already managed under special regulatory mechanisms that in many instances mirror the proposed mechanisms that current sage-grouse planning strategies recommend for conservation of the species and its habitat. Sage Grouse management should not be used as a guise to management for wildlands; lands with wilderness characteristics; wilderness study areas; or other single use lands.	All	Both	emc0342GB
69.	Each Field Office should bring forward at least two sage grouse Area of Critical Environmental Concern candidate areas, and the sage grouse Plan Amendment EIS is the most appropriate vehicle (rather than concurrent RMP revisions) to consider such ACEC nominations. ACECs are an integral part of the overall sage grouse conservation package for each Plan, and the overall sufficiency of the sage grouse protection package as a whole should be up for evaluation under the Sage Grouse Plan Amendments EIS. With this in mind, the Rock Springs Field Office's stated intention to withdraw its candidate sage grouse ACECs from the Plan Amendment process and instead pursue it in the RMP revision is a misguided one.	All	Both	emc0343GB
70.	We recommend that all sage grouse ACECs be withdrawn from oil and gas leasing and recommended for withdrawal of all leasable and locatable surface minerals from mining.	All	BLM	emc0343GB
71.	We have attached a map of proposed Sage Grouse Areas of Critical Environmental Concern, a selection of the highest-density sage grouse populations with the most pristine and defensible habitat. We believe that all high-density sage grouse lek complexes meet the relevance and importance criteria for ACEC designation as a wildlife resource, due to the	All	BLM	emc0343GB

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	BLM Sensitive Species status and current trend toward listing, and the strong fidelity of these birds to particular breeding, nesting, and wintering habitats. These areas also feature habitat for an entire sagebrush ecosystem encompassing a variety of other sagebrush-obligate species including sage sparrow, sage thrasher, Brewer's sparrow, pygmy rabbit, and white-tailed prairie dog, as well as other species such as swift fox, ferruginous hawk, Wyoming pocket gopher, and burrowing owl, further underscoring their importance and relevance as a wildlife resource.			
72.	Sage Grouse Reserves In addition to designating Core Areas, a system of sage grouse reserves should be designated where no harm to the species would be allowed. This could include restrictions on road construction, grazing, and off-road vehicle use, and which are withdrawn from future oil and gas leasing and other mineral entry. We recommend the establishment of several sage grouse Areas of Critical Environmental Concern (ACECs) in each Field Office where sage-grouse occur to serve this purpose. We have mapped our recommended sage grouse ACECs in Attachment 7 to these comments.	All	Both	emc0343GB
73.	In addition, a sage grouse Long-Term Ecological Research (LTER) area should be established to serve as a research and reference area for scientific study. We recommend the lands to the south of Green Mountain in the Red Desert as a potential LTER site.	All	Both	emc0343GB
74.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-- -grouse for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost al together in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values. The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-- values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance romote further dsertification add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscapein many areas, including very important sage-- -s communities are critical for sage-- critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that	All	Both	emc0348GB

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	conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-- where they are shown to conflict with sage-grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
75.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock-associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water	All	Both	emc0350GB

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	facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage-grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC			

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	should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage-grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
76.	ACEC Proposal: Gollaher, Snake PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	All	Both	emc0352GB
77.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial	All	Both	emc0352GB

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	lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage-grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
78.	ACEC Proposal: Limbo, Nightingale, Sahwave, Majuba, Trinity, Eugenes, Humboldt, East Range, Sonoma, Battle Mountain, Fish Creek PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	All	Both	emc0357GB
79.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over	All	Both	emc0357GB

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	time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock-associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage-grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make			

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	it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. vasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage-grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
80.	ACEC Proposal: Lone Willow PMU ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable	All	Both	emc0358GB

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	populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.			
81.	ACEC Proposal: Steptoe-Cave, Lincoln, Spring-Snake Valley PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas. FLPMA directs the secretary of the Interior to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values … giving priority to ACECs …".	All	Both	emc0361GB
82.	ACEC Proposal: South Fork, Ruby Valley PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	All	Both	emc0363GB
83.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock-associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock	All	Both	emc0364GB

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85.	Significant sage-grouse habitat overlaps with BLM special designations. The plan amendment process must include a No-Action alternative, which recognizes the fact that federal land use plans contain existing direct and indirect protections of sage-grouse habitat (including wilderness areas, national parks and monuments, wilderness study areas, areas of critical environmental concern, special recreation management areas, roadless areas, wild and scenic rivers, No Surface Occupancy (NSO) areas and others). The Environmental Impact Statement (EIS) must examine the extent to which such existing protections, or modification of such protections, can accomplish the purpose and need for the plan amendments.	All	Both	emc0376GB
86.	BLM roadless areas provide unfragmented habitat for fish and wildlife, including sage grouse. These lands also provide hunters and anglers with unparalleled opportunities for high quality recreation. The BLM currently manages thousands of acres of important contiguous and scattered roadless areas with sage grouse habitat, including breeding and winter habitat and migration areas. If we don't keep these important public lands intact, the fate of the sage grouse will remain in question.	All	BLM	emc0380GB
87.	To meet its obligations under Section 202 of FLPMA, the BLM employs administrative designations that facilitate the conservation of high value lands, such as Areas of Critical Environmental Concern and Research Natural Areas. While these existing designations provide the necessary tools to conserve lands and can effectively conserve sage grouse habitat, the titles and terminology of these designations are often not understood by people who live near and use these public lands. Rural Westerners and sportsmen often are suspicious of these designations, and communicating their meaning requires considerable time and effort. As a result, the long-term success of preexisting administrative designations has been limited to a small number of areas and acres. We believe that a new conservation designation that speaks to the values of people using and living near BLM lands would benefit from significant support and would conserve a larger number of valuable acres of key habitat than would be conserved under the status quo. The TRCP recommends creating a "Backcountry Conservation Area" (BCA) designation for the BLM to consider and use during the land-use planning process that would conserve unfragmented fish and wildlife habitat to benefit sage grouse and other species, such as mule deer, bighorn sheep and native trout. This designation would seek to maintain the characteristics of roadless core areas and	All	BLM	emc0380GB

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	would represent a multiple-use framework that allows for reasonable vegetation management exceptions to benefit fish and wildlife habitat and protect people from wildfire, while ensuring that unfragmented BLM lands maintain their undeveloped character. The BCA administrative designation should be included in the land use planning handbook to be implemented through the land use planning process to protect unfragmented sage grouse core areas from development activities. This designation should simultaneously allow vegetation management and mitigation activities that benefit fish and wildlife. The BCA designation would seek to maintain the characteristics of unfragmented fish and wildlife habitat and would represent a multiple-use conservation framework with reasonable vegetation management exceptions to benefit fish and wildlife. Most sage grouse researchers agree that sage grouse declines are due to the loss of sage brush habitat from various forms of development including oil and gas activity, urban expansion and grazing. A BCA designation would allow for sage brush habitat restoration projects that would greatly benefit sage grouse. This framework would also allow for vegetation management as it relates to protecting communities from wildfire, while all along ensuring that the surface values of these already undeveloped BLM lands maintain their backcountry character.			
88.	Lands considered for backcountry conservation designation should include the following: (1) High-quality fish and wildlife habitat or primitive or backcountry classifications for recreation opportunities; and (2) One of the following applies: a. The area is a roadless area with 5,000 or more contiguous acres of BLM lands or; b. The area is a roadless areas of fewer than 5,000 acres of contiguous BLM lands and is contiguous with national forest inventoried roadless areas, national recreation areas or other roadless federal lands, or; c. The area is of sufficient size as to make practicable its conservation. Lands considered do not require a minimum acreage, but should have physical features that make it possible to delineate area boundaries and manage the area for conservation purposes.	All	BLM	emc0380GB
89.	We recommend the BCA designation incorporate the following management principles: · This designation will conserve specific, unfragmented BLM backcountry areas with highquality fish and wildlife habitat and/or significant sporting opportunities. · Designated areas will remain open to public hunting, fishing and trapping, and state fish and wildlife agencies will retain management authority over fish and wildlife populations. · This designation will maintain existing authorized and permitted motorized routes that are important for sportsmen to access backcountry areas for hunting and fishing. · The construction of new motorized routes within designated backcountry areas will be restricted to conserve unfragmented habitat and hunting and fishing opportunities. · Vegetation management will be limited to projects that improve fish and wildlife habitat, control noxious weeds and reduce the risk of wildfire, such as projects to control cheat grass and restore sage brush. · Prescribed burning and the installation and maintenance of water guzzlers will be allowed within designated areas. · Chainsaws, helicopters and mechanical devices, such as game carts, will be allowed within designated areas. · This designation will conserve unfragmented habitat by requiring that utility corridors, pipelines and conventional and renewable energy development be located outside the boundaries of designated areas. This requirement will not be waived. · This designation will not affect valid existing rights, public lands grazing allotments or the ability of ranchers to maintain agriculture improvements.	All	BLM	emc0380GB
90.	The initial planning notice invited commenters to recommend areas on BLM lands for designation as ACECs (76 Fed. Reg. 77011) and, while the recovery alternative recommends designating a system of ACECs on BLM land to conserve sage-grouse and other sagebrush dependent species, we request the BLM extend the comment deadline for the public to	All	Both	emc0391GB

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	nominate ACECs as part of the planning process. ACECs should be central to the BLM's sage-grouse conservation strategy. The public should have additional time to identify and nominate ACECs, particularly since key information, such as maps of priority and general sage-grouse habitat, are not yet publicly available, like in Utah (see BLM Memo 2012-144).			
91.	The sage-grouse planning process should identify and designate a system of sagebrush reserves to conserve sage-grouse and other sagebrush-dependent species. In the planning process, these reserves take the form of special land use designations. Some (perhaps most) priority habitat on public land should be designated as sagebrush reserves. These areas should receive even greater protection than priority habitat. The reserve system would be the basis for sage-grouse recovery and long-term persistence in the face of climate change and continuing land uses on remaining sage-grouse priority and general habitat. Reserves on BLM land should be designated as areas of critical environmental concern. Similarly, the USFS should administratively designate sagebrush conservation areas to protect sage-grouse and other sagebrush-dependent species (36 CFR § 219.27). Both agencies should also establish additional RNAs as appropriate in sagebrush steppe.	All	Both	emc0391GB
92.	The USFS may "adopt special designations through plan amendment or revision" to conserve natural resources (36 CFR § 219.27). The USFWS should administratively designate sagebrush conservation areas (SCAs) in the current planning process with similar purpose and management as BLM ACECs to conserve sage-grouse and other sagebrush dependent species on National Forest System lands.	All	Both	emc0391GB
93.	The BLM and USFS should each designate Research Natural Areas (RNAs) in sagebrush steppe (43 CFR § 8223.0-1 - 8223.1; 36 CFR § 251.23, respectively). Both agencies have promulgated regulations to administratively establish RNAs to permanently protect species, ecosystems and natural conditions on public land for the purposes of conserving biological diversity, conducting non-manipulative research and monitoring, and fostering education. RNAs are commonly designated to preserve high quality examples of widespread ecosystems; unique ecosystems or Sage-Grouse Recovery Alternative Ï Page 31 of 121 ecological features; and rare or sensitive species of plants and animals and their habitat. RNAs can help protect biological diversity at the genetic, species, ecosystem and landscape scales. These areas are managed to maintain the natural features and processes for which they were established, and so detrimental land uses are typically prohibited. The Forest Service Chief is specifically directed to "establish a series of research natural areas sufficient in number and size to illustrate adequately or typify for research or education purposes, the important forest and ranges in each forest region, as well as other plant communities that have special or unique characteristics of scientific interest and importance" (36 CFR § 251.23). USFS has already designated numerous RNAs in sagebrush steppe, although relatively few in Nevada, and none in Wyoming (see Appendix 6), where the agency manages significant sagegrouse habitat. The agency should designate additional RNAs in sagebrush steppe as part of the proposed planning process in accordance with applicable law.	All	Both	emc0391GB
94.	d. Guidelines for Designating Sagebrush Reserves 1. Protect Large Expanses of Sagebrush Steppe Greater Sage-grouse are a landscape species (Connelly et al. 2011a). Migratory populations have large annual ranges that can encompass >2,700 km2 (1,042 mi2/667,184 ac) (Knick and Connelly 2011b, citing Dalke et al. 1963; Schroeder et al. 1999; Leonard et al. 2000) (the species may use up to 2,500 mi2 per population (Rich and Altman 2001)). Large-bodied birds are generally more strongly affected by habitat loss and fragmentation (Winter et al. 2006). Although conclusive data on minimum patch size is unavailable (Connelly et al. 2011a), conserving large expanses of sagebrush steppe is the highest priority to conserve	All	Both	emc0391GB

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	sage-grouse (Aldridge et al. 2008; Connelly et al. 2011b). Knick and Hanser (2011) identified ten lek complexes that were >5,000 km2 (1,930 mi2/1,235,526 ac) (range 5,395–100,288 km2) and 8 of them contained >100 leks (range 143– 1,139) (see Map 9). Some sagebrush-dependent species use different habitat composition, structure or succession than sage-grouse prefer. Protecting large blocks of habitat will also help preserve a mosaic of different habitats of varying successional stages used by sage-grouse and other sagebrush-dependent species.			
95.	2. Protect Small Areas and Connectivity in Sagebrush Steppe Protecting small habitat patches can help connect larger areas. Conservation strategies for sagegrouse should preserve networks of populations and/or habitat patches, including connecting smaller lek complexes within 18 km that could serve as intermediary islands of habitat for dispersing sage-grouse (Knick and Hanser 2011). Protecting small habitat patches is also important to conserve smaller birds and maintain avifaunal diversity (Winter et al. 2006). Sage-grouse may move long distances between seasonal habitats (Connelly et al. 1988). Annual movements of 40-160 km (24.8-99.4 mi) by sage-grouse along established routes have been reported (Dalke et al. 1963; Connelly 1982; Leonard et al. 2000). Although much is still unknown about the distribution, configuration, and characteristics of sage-grouse migration corridors (Connelly et al. 2011a), Beck et al. (2006) recommended conserving habitat corridors to facilitate easier movement for migratory sage-grouse.	All	Both	emc0391GB
96.	3. Protect Sage-Grouse Leks, and Nesting and Brood-rearing Habitats The loss and degradation of nesting and brood-rearing habitats, which leads to reduced nesting success and increased chick mortality, appears to be a primary cause of declining Greater Sagegrouse populations rangewide (Aldridge and Boyce 2007; Holloran et al. 2005). Most sagegrouse nesting and brood-rearing habitat is found near sage-grouse leks. Sage-grouse conservation strategies should focus on protecting leks and associated habitat. • Conservation of sagebrush within 5 km (3.1 miles) of sage-grouse leks was recommended to maintain most nesting and early brood-rearing habitat used by nonmigratory populations, whereas 18-km radii (11.2 miles) have been recommended for migratory populations (Wakkinen et al. 1992; Connelly et al. 2000; Holloran and Anderson 2005). • Braun (2006, unpublished report) recommended restricting surface occupancy and construction of new roads within 5.5 km (3.4 mi) of active sage-grouse leks. • A 4-mile (6.4 km) lek buffer encompassed 74-80 percent of sage-grouse nests in Montana and Wyoming (Moynahan 2004; Holloran and Anderson 2005). • Doherty et al. (2010b), in mapping breeding densities of Greater Sage-grouse rangewide, buffered leks by 8.5 km (5.3 mi), identified by Holloran and Anderson (2005: 746) as an area of interest (see Map 10). • A majority (~90%) of nesting and brood-rearing habitat was within 10 km (6.2 miles) of active leks in Alberta (Aldridge and Boyce 2007); 97 percent of nests were found within 6.2 miles of leks where females were marked in the Powder River Basin in Montana and Wyoming (Doherty et al. 2010a). • Sage-grouse nesting habitat was accurately predicted up to 20 km (12.4 mi) from leks in the Powder River Basin in Montana and Wyoming (Doherty et al. 2010a). • Effects of gas and oil drilling on sage-grouse were noticeable out to 12.4 miles from leks (Taylor et al. 2012). • Movements from lek sites to nesting locations can exceed 25 km (15.5 mi) (Holloran and Anderson 2005). • Characteristics of sagebrush steppe within 54 km (33.6 miles) of sage-grouse leks might influence seasonal movements and also incorporate habitats used outside the breeding season (Swenson et al. 1987; Leonard et al. 2000). GIS modeling can identify sage-grouse habitat, but only at a larger scales (Doherty et al. 2010a). Within areas identified by GIS modeling as nesting habitat, there is some local variability in which sites are actually suitable for nesting (Doherty et al. 2010a). For example, sage-grouse nests may be clumped in one area, but not other areas the same distance	All	Both	emc0391GB

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	from a lek.			
97.	4. Protect Other Seasonal Habitats Conservation strategies focused on conserving sage-grouse nesting and brood-rearing habitats that fail to address other important seasonal habitats may not yield intended benefits for sagegrouse (Connelly et al. 2000; Doherty et al. 2008). For example, sage-grouse consume forbs in summer found at mesic sites (e.g., wet meadows, riparian areas) and/or at higher elevations (Connelly et al. 2011a, citing others). A lack of mesic sites (for example, during dry years) can be limiting on sage-grouse due to lack of summer food sources (Aldridge 2000). Conservation strategies should seek to protect and restore mesic sites in sage-grouse habitat. The availability of winter habitat is also important to sage-grouse persistence. The quality of winter habitat appears to influence the abundance and condition of female sage-grouse and their nesting effort and clutch sizes in spring (Moynahan et al. 2007). The species depends almost exclusively on sagebrush exposed above the snow for food and shelter (Connelly et al. 2011a, citing others). Suitable winter habitat is often on wind swept ridges, south-facing slopes or in protected draws (Braun et al. 2005) (although research in Canada also identified winter habitat is less rugged areas and away from energy development and two-tracked roads (Carpenter et al. 2010)). These landscape features may be limited in some areas (e.g., Beck 1977). Winter habitat should be locally identified and conserved (Braun et al. 2005, citing Connelly et al. 2000 and others; Moynahan et al. 2007).	All	Both	emc0391GB
98.	5. Protect a System of Reserves A system of reserves must conserve a large proportion of habitat to sustain biological processes and conserve species. The commonly cited goal of conserving 10 percent of a given landscape lacks basis in science (Soulé and Sanjayan 1998; Svancara et al. 2005). Much larger areas, perhaps 50 percent of rangewide distribution, may be necessary to conserve biodiversity and ecosystem integrity (Soulé and Sanjayan 1998). Conservation sites identified by experts to protect diverse habitats and species (including sage-grouse) in the Great Basin covered 40 percent of the region (Nachlinger et al. 2001, unpublished report). A system of reserves must be large enough to achieve the goals of biological representation, and ecological redundancy and resiliency within an ecosystem (Svancara et al. 2005). The percentage area needed to conserve biodiversity and ecosystem processes should emerge from the biological requirements of species. Braun (2006, unpublished report) recommended conserving large blocks of sagebrush steppe (in excess of 20 mi2), one per Township (36 mi2), in fragmented habitat to conserve sage-grouse. A system of reserves should protect centers of species abundance on the landscape. Doherty et al. (2010b) found that, while sage-grouse occupy large areas, their breeding distribution is aggregated in relatively small areas. Areas representing 25 percent of the known sage-grouse population were 3.9 percent of the species range, and 75 percent of sage-grouse were within 27 percent of the species range (Doherty et al. 2010b) (see Map 10). A system of reserves should protect peripheral and/or genetically distinct populations of species. Peripheral populations are often located at the ecological limits of a species range, where species are exposed to environmental circumstances that may later become prevalent in central populations, such as effects from climate change. Such testing of the periphery can act to stabilize the entire species in the face of environmental change (Lesica and Allendorf 1995). Genetically distinct populations increase genetic diversity in a species and expand the genetic background against which natural selection occurs (Lesica and Allendorf 1995). Reserves should be designated to protect the Columbia Basin and Bi-State distinct population segments of Greater Sage-grouse in Washington (Wisdom et al. 2005c) and eastern California/southwestern Nevada, respectively. A system of reserves should prioritize preservation of areas have moderate or high potential to be maintained or restored in the face of climate change, cheatgrass incursion, unnatural	All	Both	emc0391GB

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	fire and effects from historic and current land uses (see Wisdom et al. 2005c). In general, most areas with high potential to maintain or restore sagebrush communities are concentrated in Wyoming, eastern Idaho and northern Nevada. Areas with very low, low, or moderate potential to maintain or restore sagebrush are concentrated in Washington, Oregon, western Idaho and much of Nevada (Wisdom et al. 2005c). The recovery alternative includes criteria for designating ACECs (and SCAs) based on these guidelines and applies them to Utah and Wyoming to demonstrate how BLM should designate ACECs rangewide (see Maps 12 and 14).			
99.	While we understand that BLM has certain obligations, set by legislation, regarding the management of feral horses, such obligations should not take precedence over management and conservation of a native species, such as greater sage-grouse.	All	Both	emc0398GB
100.	The Interim Management 1M applies to ongoing and proposed BLM actions, including use authorizations, within Preliminary Priority Habitat (PPH) and Preliminary General Habitat (PGH). PCW has concerns with the agencies identification of PPH and development of PPH and PGH maps. In developing its Sage-Grouse Core Area maps, the Wyoming Sage-Grouse Implementation Team first established standards for protecting the greater sage-grouse population (initially 67%), and then used a consultative process to involve interested stakeholders including industry and non-governmental organizations, the local sage-grouse working groups, and other interested members of the public to identify habitats and areas of connectivity important to sustaining greater sage-grouse populations, leading to enhanced protection of over 83% of the greater sage-grouse population in Wyoming. By contrast, the Preliminary Priority Habitat maps that have been developed for other states appear to use different methods in each state. For example, Nevada's map is clipped to federal and state lands and appears to be delineated by sagebrush land cover. Idaho, southwestern Montana and Colorado appear to be driven primarily by lek densities. Because of these inconsistencies, BLM should open the maps up for additional public comment, scientific review, and independent analysis prior to moving forward with the planning process. The outcome of the planning processes that BLM is completing will determine the types of activities that can occur in Priority Habitat for greater sage-grouse. Arbitrary or inconsistent definition of these Priority Habitat areas could present management and regulatory challenges that may be avoided with appropriate review of the maps and methods used to develop the Priority Habitat areas	All	Both	emc0399GB
101.	BLM and the USFS must establish an open, public process for identifying Priority Habitat and General Habitat maps for the EISs and SEISs and consult with interested stakeholders, including local sage-grouse working groups and industry groups. The maps must be based upon best available science, account for local habitat conditions and knowledge, and recognize valid existing rights and consider reasonably foreseeable future action~	All	Both	emc0399GB
102.	The BLM should also establish standards for assessing and identifying Priority Habitat and General Habitat.	All	Both	emc0399GB
103.	Administrative designation would include Areas of Critic~l Environmental Concern (for BLM lands) or Research Natural Areas (for both BLM and USFS lands). Since these designations are typically made during the land use planning process, it is entirely appropriate and necessary that these designations be considered at this point in time, as the plans are revised. These areas could be defined as the 75% core areas plus a buffer, as defined in Doherty et al. (2011), and should include management guidelines focused on protection of sagegrouse and their habitat. Ideally, the designated areas should also be as large, intact and unfragmented as possible and be connected with other habitat blocks.	All	Both	emc0407GB

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104.	In the past across the sagebrush biome, BLM has been loathe to consider sagebrush habitats of any significant or effective size for ACECs. This is despite the fact that, in areas like the Interior Columbia Basin Ecosystem Project analysis area, the need to protect important habitats at the landscape level has long been recognized. But significant Reserves have not been created. Very few significant ACECs have been created. Instead, ACECs have focused on small bits of land typically related to small occurrences of rare plants or some cultural areas. BLM had methods all along to protect habitats, but refused to do so. Time after time, it has allowed industry to de-rail protections. Example: WWP Bennett Hills Sagebrush Sea ACEC proposal. Even though Shoshone BLM was conducting a Plan amendment, and the ACEC was endorsed by IDFG at the time, the BLM slammed the door on landscape management of this critically important area as an ACEC. The Forest has only designated very small RNAs, typically sites in higher elevation areas. Next to nothing has been done to protect sage-grouse habitats that we are aware of. In fact, in current grazing analyses, the Intermountain Region appears hellbent on authorizing and extending grazing across Vacant allotments in rugged inhospitable arid terrain, and even opening longclosed allotments, or allowing illegal grazing in Closed Allotments, as has been occurring on Ely Forest Service lands in the Grant-Quinn Range. See WWP EWE EIS Appeal.	All	BLM	emc0411GB
105.	As part of this sage-grouse process, BLM should conduct a new WSA inventory. It has time to amend Land Use Plans to protect from any additional roading or road upgrading intrusion into significant areas of unroaded or little-roaded lands. Keeping roads from expanding or being "improved" would also limit human disturbances and help prevent increasingly motorized livestock management activity from further degrading and intruding into habitats. Unroaded areas in the 2012 setting often have very significant natural and biological values. There is high public appreciation of unroaded wild scenery, too. Unroaded sagebrush lands that are now present occur in a landscape that has become increasingly fragmented since the old Wilderness inventories treated sagebrush as a disposable landscape, and used excuses about boring scenery to cast these lands aside. Today, sagebrush wild lands are very precious, and sought out by the recreational public for aesthetic enjoyment, nature study, scientific study, hiking, camping, backpacking, photography and many other recreational pursuits. There remain, for example, in Idaho, Nevada, Oregon, Utah and other areas, scenically magnificent wild sagebrush lands juxtaposed with rugged mountain ranges. Understanding how these lands coincide with sage-grouse habitats and populations, which would be an important Biological Feature of wilderness-worthy lands is also essential. New and current inventories that fully recognize such biological and aesthetic values must be conducted. Unroaded sagebrush wild lands in Wyoming are under great assault by energy developers.	All	BLM	emc0411GB
106.	Then the real analysis would come with establishing a valid current baseline of ecological conditions so that critically important conservation measures and restoration actions could be applied, and in drawing boundaries and integrating management for large ACECs that encompass habitats necessary to conserve, enhance and restore populations. Current sage-grouse abundance and distribution must be expanded. In these areas, BLM must require that ongoing disturbance be minimized, and that disturbance be eliminated in sensitive areas. The ACECs must also encompass restoration areas and specific actions necessary to support populations that can expand and be viable over the mid and long term. Passive restoration, such as removing livestock grazing disturbance, which produces benefits very rapidly and is much less expensive over large areas than risky manipulation schemes, must be conducted in areas with remaining native sagebrush vegetation components occupied by sage-grouse. Active restoration must focus on removal and rehab of fences, water	All	BLM	emc0411GB

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	lines and troughs, linked roading, and numerous other disturbances, and seeding sagebrush and other native species to expand habitats.			
107.	BLM must provide the public with high quality information as a baseline to fully prepare ACECs, and the comment period for fully detailing these proposals must be extended to allow this.	All	BLM	emc0411GB
108.	BLM pays lip service to WSA Interim Management measures. BLM must identify sources of degradation and impairment in WSAs and Wilderness related to livestock grazing, water developments, fences, salting/supplement feeding, roading, seasons of use interfering with sage-grouse nesting and native plant health, and other disturbances and degradation. It must act to remove these as part of this process, as livestock facilities and roading adversely impact sagebrush communities and thus sage-grouse habitats and populations. BLM must fully recognize that the values of sagebrush landscapes are now much greater than at the time the old BLM Wilderness inventories were conducted. BLM must carefully determine how the natural values of WSAs are enhanced and elevated by the WSA supporting thriving populations of sage-grouse. Sage-grouse management complements management for wild untrammeled landscapes. BLM must identify actions to promote this. What livestock facilities were present when the WSA was inventoried? How does this compare to those now present? Which facilities are harming natural and other values - and which must be removed due to degradation and harms/impairment including of natural features, and sage-grouse habitats and populations?	All	BLM	emc0411GB
109.	We are greatly concerned that BLM will conduct excessive prescribed fire disturbance in WSAs under the guise of sage grouse habitat or "fuels." "Treatments" and artificial human manipulation of wild lands must be constrained. Why is there no mention of Forest roadless lands? The same must be applied to identified USFS roadless areas, Wilderness, and other unroaded lands. Plus FWS and other lands, as well - for example, the WSAs on Sheldon.	All	Both	emc0411GB
110.	Appropriate ACECs must be designated to provide for viable, recovering populations that increase the distribution and abundance of the populations.	All	Both	emc0411GB
111.	Landscapes must be conserved in large ACECs, due to sagegrouse sensitivity to disturbance, and given the sensitivity of sage-grouse to disturbance, these habitats must be buffered.	All	BLM	emc0411GB
112.	BLM roadless areas, commonly called backcountry, provide unfragmented habitat for many species of fish and wildlife, including sage grouse. These lands also provide hunters and anglers with unparalleled opportunities for high quality recreation. The BLM currently manages thousands of acres of contiguous and scattered roadless areas which provide key sage grouse habitat, including breeding and winter habitat and migration corridors. If we don't keep these important public lands intact, the fate of the sage grouse will remain in question.	All	BLM	emc0412GB emc0172rm
113.	Another key provision should be the creation of sagebrush reserves that protect the best remaining habitat from harmful land uses	All	Both	fla0000GB
114.	BLM should also designate a system of sagebrush reserves as Areas of Critical Environmental Concern to protect the highest quality remaining habitat from degrading land uses	All	Both	flc0000gb
115.	Administrative designations, such as Areas of Critical Environmental Concern (ACEC) and/or Research Natural Areas (RNA), should be used to protect priority sage-grouse habitat on BLM lands.	All	Both	flk0000gb
116.	The BLM should recognize that some areas are not appropriate for development. Each plan should permanently protect some natural areas that are high priority sage-grouse habitat from activities that have been documented to be harmful to	All	BLM	fln0000rm

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	grouse populations. Large-scale development activities, such as drilling and mining, should be directed away from the most important sage-grouse habitat. Areas of Critical Environmental Concern should be designated to protect a large amount of priority habitat from major disturbances.			
117.	If Sage Grouse determination on lands in existing WSAs, ACECs and T&E areas are redundant and or duplicative those restrictions will not be assessed.	All	Both	rmc0004GB
118.	Use of the Sage Grouse Strategy to change the multiple use mandate of so called. Wilderness Characteristic areas with uses already prescribed in exiting LUP's or to create Wildland areas within established or ongoing LUP's will constitute an agency fiat of an action reserved by Congress and shall be reported to the Chairman of the House Natural Resources Committee.	All	Both	rmc0004GB
119.	So will designation of a system of sagebrush reserves as Areas of Critical Environmental Concern (to protect the highest quality remaining habitat from degrading land uses) and retirement of grazing permits in the West.	All	Both	rmc0020GB; rmc0004RM
120.	Don't use this project to identify "wilderness character lands" leave that issue to the appropriate planning time frame and the implementation to Congress.	All	Both	rmc0032GB
121.	If this EIS management plan is adopted will the existing AEC Management plans be abandon or significantly modified?	All	Both	rmc0036GB
122.	How many AECS include areas where juniper Encroachment exists and how much acreage is now proposed for treatment in these areas?	All	Both	rmc0036GB
123.	Similarly, the NOI invites the public "to nominate or recommend areas on public lands for Greater SageGrouse and their habitat to be considered as Areas of Critical Environmental Concern as part of this planning process." Such designations should follow a stand-alone process for establishing Areas of Critical Environmental Concern, providing public notice and opportunity for comment BEFORE any such Areas are designated. These should not be rolled into and hidden within the actions associated with Sage-Grouse actions.	All	Both	rmc0058GB
124.	addition, on December 13, 200 l we submitted a nomination for the Tyler Mountain ACEC and such nomination and the reports are incorporated by reference (ACEC Nomination), See also BLM's administrative record for the August 2011 lease sale for comment letters from federal, state and local governments describing the important wildlife habitat and water resource values on Pinto Valley Ranch: L Sidener, Colorado Department of Wildlife (CDOW) (February 17, 2011) attached toR, Watson's Comment Letter as Exhibit 3; Grand County Commissioners (February 1, 2011) attached to R, Watson's Comment Letter as Exhibit 4; Colorado River Water Conservation District (March 24, 2011) attached toR, Watson's Comment Letter as Exhibit 4; R Timberman, U,S, Fish and Wildlife Service (USFWS) (March 22, 2011) attached thereto as Exhibit 5; and M, Volt, U,S, Department of Agriculture, Natural Resource Conservation Service (NRCS) (March 22, 2011) attached toR, Watson's Comment Letter as Exhibit 6 (all of the foregoing comments are incorporated by reference),	CO	BLM	emc0057RM
125.	Fmihermorc, as previously requested, BLM should designate and protect the areas owned by Wingspread West LLC, McGee Resources LLC, Tyler Mountain LLC, Casdorf Holdings LLC, Ingram Homestead LLC and Shawkemo Enterprises Inc (collectively, Stolz) subject to a BLM split estate and depicted on the map attached to the ACEC Nomination as Exhibit 2 (Proposed Tyler Mountain ACEC), The Proposed Tyler Mountain ACEC deserves special management attention because	CO	Both	emc0057RM

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	it contains large continuous unfragmented critical habitat for endangered, sensitive and threatened plant and animal species (including habitat essential for maintaining species diversity), rare, sensitive and endangered plant communities, rare geological and paleontological resources, cultural resources and original homestead and other historic structures, significant scenic values that contain more than locally significant qualities and circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened and vulnerable to adverse change, Each of these factors individually warrants special management attention but, when taken together, the totality of the area resources provides even more compelling justification for an ACEC designation for the Proposed Tyler Mountain ACEC due to the cumulative and overlapping resources, As compared to other similarly situated areas that have been designated or proposed as ACECs (in particular, the Kremmling PCA ACEC and the Kremmling Ammonite ACEC which are in the same immediate area as the Proposed Tyler Mountain ACEC and contain resources similar, if not inferior, to those on the Proposed Tyler Mountain ACEC), the Proposed Tyler Mountain ACEC requires at least the same special management designation in order to protect and prevent irreparable damage to important paleontologic, historic, cultural, and scenic values; plant and wildlife resources; and other natural ecosystems or processes.			
126.	BLM is obligated to manage the sage-grouse, a BLM "special status" species and ESA candidate species, to prevent its listing under the ESA. Dr. M. Holloran, a sage grouse expert whose research is cited extensively by BLM throughout the DRMP/DEIS, based on his expertise, investigation and site-visits to the Proposed Tyler Mountain ACEC, has concluded that the "sagebrush dominated areas on [Proposed Tyler Mountain ACEC] have special worth, significance, distinctiveness and substantial values for sage-grouse and the sagebrush habitats on the [ProposedTyler Mountain ACE C) are significant and critical for management of the species in Colorado." Dr. M. Holloran Cover Memo to Report, "Identification of Sage-Grouse Occupied Habitats on Split-Estate Portion of Pinto Valley Ranch, Grand County, Colorado" (November 2011), Exhibit II to R. Watson's Comment Letter. (emphasis added). Dr. Holloran concludes that to properly protect the sage-grouse and its habitat, the Proposed Tyler Mountain ACEC's split-estate parcels should be closed to oil and gas development ~ that the suggested timing restrictions in the DRMP/DEIS Altemative B for these split-estate lands are inadequate.	CO	BLM	emc0057RM
127.	The sage-grouse on the Proposed Tyler Mountain ACEC are part of the Middle Park population on the eastem border of the bird's range in northwest Colorado. In 1999, the Middle Park Greater Sage-grouse Working Group 4 was formed and with the assistance of state and federal agencies including USFWS, the U.S. Geological Survey (USGS) and CDOW completed the Middle-Park Greater Sage-Grouse Conservation Plan (Middle Park Plan) in 200 l. 5 The Middle Park Plan specifically recognizes the important and critical contribution of private lands to the area sage-grouse since private surface provides a substantial portion - some 26% - of the sage-grouse habitat in Middle Park. BLM is a formal signatory and a committed participant in the implementation of the Colorado Greater Sage-grouse Conservation Plan (March 2008) ("CO Sage-Grouse Plan")6 BLM committed "to work with private landowners ... to implement necessary conservation actions to maintain or enhance Greater Sage-grouse habitat." See CO Sage-Grouse Plan Signature Page. There is at least one identified lek (Castle lek) on the Proposed Tyler Mountain ACEC and additional leks are found on adjacent properties. See Exhibit I at Er. D-1. D-3 toR. Watson's Comment Letter. There is also evidence of additional leks on the Proposed Tyler Mountain ACEC. !d.; see also EXhibit 7 at 1-2; Exhibit 9 at I to R. Watson 's Comment Letter.	CO	BLM	emc0057RM

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128.	For Special Status Species, like the sage-grouse, "habitat loss and fragmentation have been, and remain, the primary cause of their imperiled status." DRMP/DE!S, Ch. 3 at 3- 100. BLM recognizes that "[l]arge contiguous areas of habitat have been shown to support aud maintain Greater sage-grouse populations, and are necessary in order to provide lower densities of nesting hens." !d. Ch. 4 at 4-283. Given the highly specific requirements of sage-grouse nesting and wintering habitat, any disruption is detrimental to sage-grouse populations. !d. at 4-283. Thus, BLM recognizes it is crucial to preserve large blocks of un-fragmented sagebrush habitat. Considering only the Castle lek, all of the split estate parcels on the Proposed Tyler Mountain ACEC are within 2-3 miles of a lek. Furthermore, this split estate surface provides important nesting, brood rearing and winter habitat for a resident population of sage-grouse. Exhibit l at Ex. Bto R. Watson's Comment Letter (Dr. Holloran report,March 22, 2011). A more recent on-site survey confirms that these sage-grouse occupy 88% of the split estate parcels on the Proposed Tyler Mountain ACEC. 7 Exhibit11 toR. Watson's Comment Letter. Dr. Holloran has concluded that "sagebrush habitats on [Proposed Tyler Mountain ACEC] are suitable for sage-grouse; all sagebrush dominated areas of [Proposed Tyler Mountain ACEC] that were surveyed during field efforts are used by sage-grouse; and all sagebrush habitats on [Proposed Tyler Mountain ACEC] that were surveyed during field efforts should be protected as core sage-grouse habitat as established in the Colorado greater sage-grouse conservation plan ... the[se} sagebrush dominated areas on [Proposed Tyler Mountain ACEC} have special worth, significance, distinctiveness and substantial values for sage-grouse ... " Exhibit ll Cover Memo atl to R. lVatson ·s Comrnent Letter (emphasis added). See also Holloran in Stolz EA Comments (Ex. 1) at Exhibit Band Maps at Exhibit D-1 to D-3. His expert conclusion is that the Proposed Tyler Mountain ACEC, including split-estate parcels subject to federal oil and gas development, hosts a largely sedentary, non-migratory population of sagegrouse that enjoy unfragmented access to all their seasonal habitat needs and that need to be protected as core sage-grouse habitat. !d.	CO	BLM	emc0057RM
129.	The CDOW has also identified the Proposed Tyler Mountain ACEC split-estate parcels as important sage-grouse habitat. According to biologists with CDOW, the Middle Park sage-grouse population is one of only two populations in Colorado not influenced by oil and gas development. ld, Cover Memo at 1. The CDOW recommended the deferral of the Proposed Tyler Mountain ACEC parcels from leasing and emphasized that the CO Sage-Grouse Plan calls for "expansion of current greater sage-grouse protections (e.g., 0.6 mile no surface occupancy (NSO) around leks, expansion of nesting habitat timing limitations to 4-mile radii)." See Aug 20 ll Lease Sale Comments, L. Sidener, CDOW, (February 17, 2011). Thus, this CDOW recommendation would include all the Ranch split estate parcels which are 3-4 miles or less from the Castle lek. !d. CDOW also strongly recommended that BLM defer leasing on CDOW core area on both federal and fee surface. Jd. The CDOW concluded its comments on the Proposed Tyler Mountain ACEC sage grouse by noting that "base[d] on radio collard data, all the parcels … had sage grouse activity." !d.	CO	BLM	emc0057RM
130.	Dr. Holloran's March 20 11 report (Exhibit I, Ex. B) provides detailed support of his conclusion that for this sedentary, non-migratory sage-grouse population, the habitat on the Proposed Tyler Mountain ACEC is priority habitat that should be protected from leasing under the terms of the Sage-grouse JM. This conclusion was strongly confirmed with the results of the 2011 survey. Exhibit ll to R. Watson's Comment Letter. Dr. Holloran's conclusion is that oil and gas development, will negatively influence the sagegrouse population that is reliant on habitats surrounding the active lek. Sage-grouse breeding, nesting, early brood-rearing, and late brood-rearing/summering, and wintering habitats may be directly impacted by	CO	BLM	emc0057RM

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	development of these parcels. !d. at 2. In sum:			
131.	Sage-grouse Nesting and Early Brood-Rearing Habitats ··- There is potential nesting and early brood-rearing habitat within 8 km of known lek as identified through the Colorado Vegetation Classification Project data. CDOW documented sage-grouse use of all parcels, supporting the conclusion that suitable habitat exists in the parcels. Sagebrush dominant habitats within 5.5 km of a lek have a higher probability of use for nesting and early brood-rearing. Female sage-grouse avoid nesting within 1 km of oil and gas infrastructure and have a lower annual survival. Chick survival decreases within l km of visible wells. !d. at 2.	CO	BLM	emc0057RM
132.	Sage-grouse Late Brood-Rearing and Summer Habitats -Potential suitable sagegrouse late brood-rearing habitats exist within all of BLM split estate parcels. Important sage-grouse brooding habitat generally includes wet areas such as meadows, springs, ponds and streams plus a 200-m zone around these water features. The mesic cover classes from the Colorado Vegetation Classification Project support a professional conclusion that the parcels include potential late brood-rearing habitat. Female sage-grouse breeding or nesting near oil and gas development have decreased summer survival. Brood-rearing female sage-grouse avoid areas with high densities of visible wells within 1 km. Chick survival also decreases. Id. at 2.	CO	BLM	emc0057RM
133.	Risk to Sage-grouse from Cheatgrass- Finally, Dr. Holloran noted the risk of the infiltration of Cheatgrass and other grasses as a result of oil and gas disturbance that would negatively impact the sagebrush obligate sage-grouse. This would limit the population, eliminate nesting and early brood-rearing habitat and reduce winter and severe winter range. !d. at 7.	CO	BLM	emc0057RM
134.	Dr. Holloran concludes that, "research suggests that oil or gas development within sagebmsh habitats on or near [Proposed Tyler Mountain ACEC) would fall within the spatial scale where persistence of sage-grouse populations residing on the [Proposed Tyler Mountain ACEC] would likely be jeopardized." Exhibit 11, Cover Memo at 1-2 to R. Watson's Comment Letter. Oil and gas development on one of only two areas in the State that host sage-grouse populations not influenced by oil and gas makes no sense given BLM 's policy to treat the sage-grouse as listed and to maintain and improve habitat.	CO	BLM	emc0057RM
135.	significant problem for BLM's analysis and proposed mrtrgation for sage-grouse habitat is that the CDOW map of sage-grouse habitat upon which BLM has relied, is not accurate for site-specific management. !d. at 2. The CDOW sage-grouse core areas were developed at statewide spatial scales and were never intended by CDOW to be utilized for site-specific consideration as BLM has done in the DRMP/DEIS. Jd. The CDOW maps simply do not accurately reflect the habitats occupied by sage-grouse as is made abundantly clear by Dr. Holloran's on-site survey. Exhibit II. The conclusions of CDOW (L. Sidenar, CDOW Comment, February 17, 201 0) and Dr. Holloran support moving the occupied area boundary line further west and closing the area to oil and gas leasing and including the greater area in the ACEC. See Exhibit II at 2; see also Stolz EA Comments (Ex. 1) at Ex. B.	CO	BLM	emc0057RM
136.	As discussed by Dr. Holloran (Exhibit II, Cover Memo), in the DRMP/DEIS Appendix S, the Kremmling Potential Conservation Area is recommended as an ACEC by BLM because the "area contains important core habitat for greater sage-grouse . . ." DRMP/DEIS, App. Sat E-11-12. Yet, the Kremmling PCA is located within core sagegrouse habitat associated with the Castle lek, the identified lek, on the [Proposed Tyler Mountain ACEC]. Exhibit II, Cover Memo at 2. As Dr. Holloran points out: without protection of the population of sage-grouse that breeds on the lek located on [Proposed	CO	BLM	emc0057RM

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	Tyler Mountain ACEC], the Kremmling PCA ACEC will provide no value for sage-grouse because there will be no sage-grouse to use the area. . . Given that habitats on (Proposed Tyler Mountain ACEC} have special worth, significance, distinctiveness and substantial values, it is my opinion that sagebrush habitats on [Proposed Tyler Mountain ACEC} are worthy of at/east the same protections as those afforded the Kremmling PCA ACEC. Exhibit 11, Cover Memo at 2. (emphasis added). The fact that BLM has proposed to protect the sage-grouse habitat in the Kremmling PCA ACEC and the sage-grouse and paleontological resources in the Kremmling Ammonite ACEC should provide strong and compelling precedent for a special management designation for the same resources that are found over the BLM's interest in the Proposed Tyler Mountain ACEC.			
137.	In summary, Dr. Holloran states "it is safe to conclude that a large, non-migratory population of sage-grouse inhabits [Proposed Tyler Mountain ACEC] and that habitats found on the [Proposed Tyler Mountain ACEC] are used by sage-grouse during all lifehistory stages." I d. In his opinion, "the sagebrush-dominated areas on (Proposed Tyler Mountain ACE C) have special worth, significance, distinctiveness and substantia/values for sage-gmuse and that sagebrush habitats on the [Proposed Tyler MountainAC~C} are significant and critical for management of the species in Colorado." Exhibit 11, Cover memo. (emphasis added). It is also Dr Holloran's opinion that "sagebrush habitats on [Proposed Tyler Mountain ACEC] are worthy of at least the same protections as those afforded the Kremmling PCA ACEC." Id. Further, Dr Holloran's concludes that "[Proposed Tyler Mountain ACECJ should be designated an ACEC because, among other things, protection of the [Proposed Tyler Mountain ACEC]'s sagebrush habitats is essential to maintaining the Kremmling PCA ACEC's value to sage-grouse." Jd. (emphasis added). Accordingly, the Proposed Tyler Mountain ACEC possesses important and relevant resources that require special management warranting an ACEC designation.	CO	BLM	emc0057RM
138.	The BLM should consider a 'conservation alternative' that: - Includes conservation measures recommended by the NTT Report, with improvements, including, but not limited to the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with addition of further conservation measures, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,31 thus negating the value of designated priority habitats. Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT.	CO	BLM	emc0070RM
139.	7. BLM should designate ACECs to protect priority habitat. BLM's scoping notice invites the public "to nominate or recommend areas on public lands for greater sage-grouse and their habitat to be considered as Areas of Critical Environmental Concern [ACEC] as a part of this planning process." 76 Fed.Reg. 77011. Initially, we urge the BLM to provide additional time for submission of ACEC nominations to allow for receiving meaningful, comprehensive recommendations	CO	BLM	emc0070RM

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	to further range-wide conservation efforts. Alternatively, BLM can commit to fully analyze ACECs proposed after the scoping period. This is particularly important in Colorado, as information on the location of preliminary priority habitat is critical to informed ACEC nominations, and the CPW maps of preliminary priority habitat have only been available to the public for a short time.			
140.	a. ACECs are an appropriate tool for protecting priority sage-grouse habitat. The Federal Land Policy and Management Act (FLPMA) obligates the BLM to "give priority to the designation and protection of areas of critical environmental concern." 43 U.S.C. § 1712(c)(3). ACECs are areas "where special management is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes." 43 U.S.C. § 1702(a). BLM's ACEC Manual (1613) provides additional detail on the criteria to be considered in ACEC designation, as discussed in the applicable regulations, as well. See, Manual 1613, Section .1 (Characteristics of ACECs); 43 C.F.R. § 8200. An area must possess relevance (in that it has significant value(s) in historic, cultural or scenic values, fish & wildlife resources, other natural systems/processes, or natural hazards) and importance (in that it has special significance and distinctiveness by being more than locally significant or especially rare, fragile or vulnerable). In addition, the area must require special management attention to protect the relevant and important values (where current management is not sufficient to protect these values or where the needed management action is considered unusual or unique), which is addressed in special protective management prescriptions. In the context of this planning effort, BLM and USFWS have already essentially determined that sage-grouse habitat meets these criteria.	CO	BLM	emc0070RM
141.	Pursuant to BLM's ACEC Manual, for potential ACECs, management prescriptions are to be "fully developed" in the plan and an ACEC is to be as large as is necessary to protect the important and relevant values. Manual 1613, Section .22. BLM should identify key areas to be protected as ACECs and designate them with specific management prescriptions.	CO	BLM	emc0070RM
142.	b. Criteria for designating ACECs. BLM should consider designation of ACECs as a tool to achieve the goal of maintaining and enhancing greater sage-grouse populations. Designations should be applied with strict management guidance so that sage-grouse conservation is the primary objective.	CO	BLM	emc0070RM
143.	For the purposes of the discussion below, we assume that priority habitat for the purposes of this planning process, in a given Field Office, will include all of the area managed by the Field Office delineated as preliminary priority habitat by Colorado Parks and Wildlife. The NTT's recommendations should be used as a starting point for achieving effective conservation in priority habitats. BLM should strive to implement them to the fullest extent possible as range-wide standards in each RMP, while refining them further to better address specific issues (such as vegetation management and energy development) consistent with the best available science. ACECs should prescribe maximum protections for, and comprehensive monitoring of, sage-grouse populations.	CO	BLM	emc0070RM
144.	We suggest that BLM use the criteria outlined below to identify areas of high biological value for sage-grouse that can be set-aside from large-scale development and managed with emphasis on maintaining and enhancing greater sage-grouse populations. Areas that meet the criteria will also meet BLM's relevance and importance criteria for ACEC designation. BLM should also identify actions necessary to allow permanent protection of these areas, as well as other "interim" measures to maximize protection in the meantime. Doherty et al. (2011) developed a framework for conservation planning to maximize greater sage-grouse conservation while balancing this need with ongoing energy development.	CO	BLM	emc0070RM

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	Doherty et al.'s methodology sets forth a useful framework, with incorporation of some additional criteria, to identify areas to be protected from development and designated as ACECs through this planning process.			
145.	BLM should delineate areas of particularly high biological value for greater sage-grouse. In Colorado, the preliminary priority habitat delineated by Colorado Parks and Wildlife should be considered to be of high biological value, and be used as a starting point for identifying areas that meet the criteria for ACEC designation. The approach of delineating areas of high biological value as a starting point for conservation planning is outlined in Doherty et al. 2011.32 Ideally, BLM should designate 100% of the preliminary priority habitat delineated by Colorado Parks and Wildlife as ACECs that are set-aside from all threats with potential to negatively impact greater sage-grouse populations. These areas should then be managed to permanently maintain and enhance populations. This may be especially important in parts of Colorado with small, isolated populations that are particularly vulnerable to extirpation. However, we recognize that legal, social and political factors (particularly around energy development), may make this difficult for BLM to achieve across Colorado.	CO	BLM	emc0070RM
146.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Prioritize ACEC designation of the high biological value areas that are necessary to sustain at least 50% of the existing population. Prioritize areas within the Northwest Colorado and North Park Population that have historically supported high densities of breeding birds. For the remaining small, isolated populations, consider protecting the area needed to sustain a higher proportion of the overall population (up to 100%).	CO	BLM	emc0070RM
147.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Prioritize ACEC designation in relatively large contiguous areas that are: 1) within areas of high biological value, 2) currently undeveloped, and 3) unencumbered by valid existing rights, and/or have low potential for development (e.g., low wind or oil and gas potential)33. These areas where high biological value intersects with low energy development potential identify low conflict areas on which to immediately focus ACEC designation.	CO	BLM	emc0070RM
148.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Consider ACEC designation in high biological value areas that, although encumbered by valid existing rights, are not yet developed. This may be particularly feasible where actual development potential is low despite the existence of valid existing rights (e.g., due to speculative leasing in areas of low energy potential). It may also be feasible in areas where other constraints (e.g., lack of infrastructure, other resource conflicts) will make development relatively difficult and costly. Management of ACECs designated in such areas could include aggressive pursuit of available tools to increase the amount of protected habitat, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts. This is important, as Doherty et. al. (2011) found that 1/3 of the 25% core areas have been leased for oil and gas development. Further, 44% of areas with high biological value are at risk for energy development.34	CO	BLM	emc0070RM
149.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs	CO	BLM	emc0070RM

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	informed by the following additional criteria: Consider Audubon's Important Bird Areas for ACEC designation or other high level habitat protection that ensures no to minimal disturbance.35			
150.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Consider prioritizing areas that meet the previous criteria and are near high biological value areas that are likely to be developed, to promote resilience of populations disturbed by development.	CO	BLM	emc0070RM
151.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Consider including relatively large contiguous acreages of lower biological value areas that currently are undeveloped, are unencumbered by valid existing rights, or have low potential for development. This may be important when such areas increase the size and continuity of the areas described above, or where there are limited areas that meet the previous criteria. Doherty et al. (2011) suggest that these areas represent low conflict opportunities for sage-grouse, and note that such areas may be important, for example, to maintain connectivity between high value core regions within Montana as well as between Montana and adjacent states.	CO	BLM	emc0070RM
152.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Once the above areas have been mapped, work to maximize the spatial continuity and size of designated ACECs.	CO	BLM	emc0070RM
153.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: ACECs can be designated for habitat, but also for historic, cultural and scenic values. BLM should prioritize ACEC designation for lands that contain priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. This approach will allow BLM to ensure that ACECs maximize protection of multiple sensitive resource values benefiting a range of user groups.	CO	BLM	emc0070RM
154.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of preliminary priority habitat delineated by Colorado Parks and Wildlife, along with designation of ACECs informed by the following additional criteria: Prioritize providing resources to ACEC designation, plan development and plan implementation.	CO	BLM	emc0070RM
155.	c. Specific ACECs already being evaluated in CO RMP amendment processes should be considered for designation through this process. Certain CO RMPs currently undergoing revision are evaluating proposed ACECs that would protect priority habitat for the greater sage-grouse. These ACECs should be specifically considered for designation through this EIS process.	CO	BLM	emc0070RM
156.	Recommendations: BLM should provide additional time for submission of ACEC nominations, make full use of this important tool, and consider both general criteria for identifying areas for designation and ACECs already under evaluation.	CO	BLM	emc0070RM
157.	8. BLM should designate Research Natural Areas. In addition to ACEC designations, BLM should determine appropriate sites for Research Natural Area (RNA) designation which is intended to: (1) preserve examples of all significant natural	CO	BLM	emc0070RM

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	ecosystems for comparison with those influenced by man; (2) to provide educational and research areas for ecological and environmental studies; and (3) to preserve gene pools of typical and endangered plants and animals. RNAs are intended to represent the diversity of North American ecosystems with their biological communities, habitats, natural phenomena, and geological and hydrological formations. RNAs can help BLM and other agencies maintain current data and records of sage-grouse habitat and population changes. RNAs are largely used for non-manipulative research and baseline data gathering on relatively unaltered community types. In addition to the benefits RNAs could provide researchers and managers, these protected areas also safeguard essential habitat types that will be preserved in their natural state for future generations.			
158.	Recommendations: BLM should consider designating Research Natural Areas through this process.	CO	BLM	emc0070RM
159.	The BLM should recognize that some areas are not appropriate for development. Each plan should permanently protect some natural areas that are high priority sage-grouse habitat from activities that have been documented to be harmful to grouse populations. Large-scale development activities, such as drilling and mining, should be directed away from the most important sage-grouse habitat. Areas of Critical Environmental Concern should be designated to protect a large amount of priority habitat from major disturbances.	CO	BLM	fll0000RM
160.	3. The BLM should recognize that some areas are not appropriate for development. Each plan should permanently protect some natural areas that are high priority sage-grouse habitat from activities that have been documented to be harmful to grouse populations. Large-scale development activities, such as drilling and mining, should be directed away from the most important sage-grouse habitat. Areas of Critical Environmental Concern should be designated to protect a large amount of priority habitat from major disturbances.	CO	BLM	flm0000RM
161.	Each alternative should designate areas of contiguous sage-grouse habitat not currently subject to mineral leases or other valid existing rights for permanent protection. These remaining refugia can provide intact, diverse, high quality sagebrush habitat, vital to sage-grouse and other sagebrush obligate species. In Instruction Memorandum WY-2010-013, the Wyoming BLM proposed 11 contiguous square miles or sections as an appropriate minimum size for an area of habitat to qualify for being set-aside from development.6 The Wyoming BLM recognized these large unleased contiguous blocks as opportunities for grouse conservation. This number should be scaled to allow for protecting smaller contiguous areas in states with smaller populations than Wyoming's, or in areas where there are few remaining contiguous 11-square-mile areas that are not subject to valid existing rights. These identified, contiguous areas of undeveloped land should be considered for designation as Areas of Critical Environmental Concern in all alternatives. (See Section 8 on ACECs for further discussion)	East	Both	emc0089RM
162.	Each alternative should designate areas of contiguous sage-grouse habitat not currently subject to mineral leases or other valid existing rights for permanent protection. These remaining refugia can provide intact, diverse, high quality sagebrush habitat, vital to sage-grouse and other sagebrush obligate species. In Instruction Memorandum WY-2010-013, the Wyoming BLM proposed 11 contiguous square miles or sections as an appropriate minimum size for an area of habitat to qualify for being set-aside from development.6 The Wyoming BLM recognized these large unleased contiguous blocks as opportunities for grouse conservation. This number should be scaled to allow for protecting smaller contiguous areas in states with smaller populations than Wyoming's, or in areas where there are few remaining contiguous 11-square-mile	East	Both	emc0089RM

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	areas that are not subject to valid existing rights. These identified, contiguous areas of undeveloped land should be considered for designation as Areas of Critical Environmental Concern in all alternatives. (See Section 8 on ACECs for further discussion)			
163.	iv. The BLM and FS should analyze an alternative that provides more protection than that afforded by implementation of the National Technical Team's Recommendations. The BLM and FS should consider an alternative that: - Includes conservation measures recommended by the NTT Report. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT. - Incorporates improvements to the NTT's recommendations, including the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with improvements, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,10 thus negating the value of designated priority habitats. o Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions.	East	Both	emc0089RM
164.	7. BLM SHOULD DESIGNATE ACECS TO PROTECT PRIORITY HABITAT BLM's scoping notice invites the public "to nominate or recommend areas on public lands for greater sage-grouse and their habitat to be considered as Areas of Critical Environmental Concern [ACEC] as a part of this planning process." 76 Fed.Reg. 77011. Initially, we urge the BLM to provide additional time for submission of ACEC nominations to allow for receiving meaningful, comprehensive recommendations to further rangewide conservation efforts. Alternatively, BLM can commit to fully analyze ACECs proposed after the scoping period.	East	Both	emc0089RM
165.	i. ACECs are an appropriate tool for protecting priority sage-grouse habitat The Federal Land Policy and Management Act (FLPMA) obligates the BLM to "give priority to the designation and protection of areas of critical environmental concern." 43 U.S.C. § 1712(c)(3). ACECs are areas "where special management is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes." 43 U.S.C. § 1702(a). BLM's ACEC Manual (1613) provides additional detail on the criteria to be considered in ACEC designation, as discussed in the applicable regulations, as well. See, Manual 1613, Section .1 (Characteristics of ACECs); 43 C.F.R. § 8200. An area must possess relevance (in that it has significant value(s) in historic, cultural or scenic values, fish & wildlife resources, other natural systems/processes, or natural hazards) and importance (in that it has special significance and distinctiveness by being more than locally significant or especially rare, fragile or vulnerable). In addition, the area must require special management attention to protect the relevant and important values (where current management is not sufficient to protect these values or where the needed management action is considered unusual or unique), which is addressed in special protective management prescriptions. In the context of this planning effort, BLM and USFWS have already essentially determined that sage-grouse habitat meets these criteria.	East	Both	emc0089RM

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166.	Pursuant to BLM's ACEC Manual, for potential ACECs, management prescriptions are to be "fully developed" in the plan and an ACEC is to be as large as is necessary to protect the important and relevant values. Manual 1613, Section .22. BLM should identify key areas to be protected as ACECs and designate them with specific management prescriptions.	East	Both	emc0089RM
167.	ii. Criteria for designating ACECs BLM should consider designation of ACECs as a tool to achieve the goal of maintaining and enhancing greater sage-grouse populations. Designations should be applied with strict management guidance so that sage-grouse conservation is the primary objective.	East	Both	emc0089RM
168.	As we have not yet seen maps of priority habitat for most states, it is difficult to comment on how ACECs should be designated in relation to priority habitat. Ideally, priority habitat will be delineated to encompass breeding, late-brood rearing and winter concentration areas, as well as migration and connectivity corridors - consistent with the NTT's Report. Priority protected habitat areas must be large enough to maintain and increase current sage-grouse abundance and distribution. For the purposes of the discussion below, we assume that priority habitat will encompass sufficient habitat to maintain at least 80-90% of the current sage-grouse population in each state. If priority habitat is of sufficient size, then ACECs may be a subset of priority habitats in most states. The NTT's recommendations should be used as a starting point for achieving effective conservation in priority habitats. BLM should strive to implement them to the fullest extent possible as range-wide standards in each RMP, while refining them further to better address specific issues (such as vegetation management and energy development) consistent with the best available science. ACECs should prescribe maximum protections for, and comprehensive monitoring of, sage-grouse populations.	East	Both	emc0089RM
169.	We suggest that BLM use the criteria outlined below to identify areas of high biological value for sage-grouse that can be set-aside from large-scale development and managed with emphasis on maintaining and enhancing greater sage-grouse populations. Areas that meet the criteria will also meet BLM's relevance and importance criteria for ACEC designation. BLM should also identify actions necessary to allow permanent protection of these areas, as well as other "interim" measures to maximize protection in the meantime. Doherty et al. (2011) developed a framework for conservation planning to maximize greater sage-grouse conservation while balancing this need with ongoing energy development. Doherty et al.'s methodology sets forth a useful framework, with incorporation of some additional criteria, to identify areas to be protected from development and designated as ACECs through this planning process.	East	Both	emc0089RM
170.	As a starting point, BLM should delineate areas of particularly high biological value for greater sage-grouse, which may be a subset of the priority habitat, depending on how priority habitat is delineated in each state and on the overall size of the populations in a given state. Doherty et al. (2011) identified core regions of sage-grouse abundance by estimating the smallest area necessary to contain 25, 50, 75, and 100% of the breeding population within 5, 12, 30, and 60% of the eastern/Rocky Mountain region sage-grouse range. The authors define an area as having high biological value with respect to conservation planning if the area is in the top three groupings of breeding densities: 25, 50, and 75% core regions, as these groups contained 75% of the regional breeding population, in only 30% of the eastern sage-grouse distribution. They defined areas in North and South Dakota as having high biological value even in 100% core regions, because these fringe populations experience the highest risk of extirpation. Even with the inclusion of 100% of the core regions in North and South Dakota, this results in the classification of only 31% of the eastern/Rocky Mountain sage-grouse distribution as high biological value. These areas should be used as a starting point for identifying areas that meet the criteria for ACEC	East	Both	emc0089RM

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	designation. Because Doherty et al. (2011) did not have information on other seasonal habitats, this methodology is based only on nesting/breeding habitat. Thus, particularly in states that have relevant information on other seasonal habitats (from mapping of seasonal habitats and use of radio-marked birds to document seasonal habitat use, such as winter range, and migration), areas of high biological value with respect to meeting all seasonal habitat needs should also be identified and considered for ACEC designation.			
171.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Prioritize ACEC designation of the high biological value areas that are necessary to sustain 50% of the existing population. 16	East	Both	emc0089RM
172.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Prioritize ACEC designation in relatively large contiguous areas that are: 1) within areas of high biological value, 2) currently undeveloped, and 3) unencumbered by valid existing rights, and/or have low potential for development (e.g., low wind or oil and gas potential)17. These areas where high biological value intersects with low energy development potential identify low conflict areas on which to immediately focus ACEC designation.	East	Both	emc0089RM
173.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Consider ACEC designation in high biological value areas that, although encumbered by valid existing rights, are not yet developed. This may be particularly feasible where actual development potential is low despite the existence of valid existing rights (e.g., due to speculative leasing in areas of low energy potential). It may also be feasible in areas where other constraints (e.g., lack of infrastructure, other resource conflicts) will make development relatively difficult and costly. Management of ACECs designated in such areas could include aggressive pursuit of available tools to increase the amount of protected habitat, including fluid mineral lease retirements, voluntary grazing permit retirement (where beneficial), mineral withdrawal, coal unsuitability findings, and mineral claim buyouts. This is important, as Doherty et. al. (2011) found that 1/3 of the 25% core areas have been leased for oil and gas development. Further, 44% of areas with high biological value are at risk for energy development18.	East	Both	emc0089RM
174.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Consider prioritizing areas that meet the previous criteria and are near high biological value areas that are likely to be developed, to promote resilience of populations disturbed by development.	East	Both	emc0089RM
175.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Consider including relatively	East	Both	emc0089RM

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	large contiguous acreages of lower biological value areas that currently are undeveloped, are unencumbered by valid existing rights, or have low potential for development19. This may be important when such areas increase the size and continuity of the areas described above, or where there are limited areas that meet the previous criteria. Doherty et al. (2011) suggest that these areas represent low conflict opportunities for sage-grouse, and note that such areas may be important, for example, to maintain connectivity between high value core regions within Montana as well as between Montana and adjacent states.			
176.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Once the above areas have been mapped, work to maximize the spatial continuity and size of designated ACECs.	East	Both	emc0089RM
177.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: ACECs can be designated for habitat, but also for historic, cultural and scenic values. BLM should prioritize ACEC designation for lands that contain priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. This approach will allow BLM to ensure that ACECs maximize protection of multiple sensitive resource values benefiting a range of user groups.	East	Both	emc0089RM
178.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Prioritize providing resources to ACEC designation, plan development and plan implementation.	East	Both	emc0089RM
179.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: Consider Audubon's Important Bird Areas for ACEC designation or other high level habitat protection that ensures no to minimal disturbance.	East	Both	emc0089RM
180.	iii. Specific ACECs already being evaluated Certain RMPs currently undergoing revision are evaluating proposed ACECs that would protect priority habitat for the greater sage-grouse. These ACECs should be specifically considered for designation through this EIS process. Examples include: - Government Draw/Upper Sweetwater Sage-Grouse ACEC. Draft RMP for the Lander Field Office at 208-09.21 - Twin Creek ACEC. Draft RMP for the Lander Field Office at 38, 208-09. - Chapman Bench ACEC. Draft RMP for Bighorn Basin22 at 2-22 and 2-23, Appendix F at F-8. - Clarks Fork Canyon ACEC. Draft RMP for Bighorn Basin at 2-22 and 2-23, Appendix F at F-9. - McCullough Peaks/YU Bench ACEC. Draft RMP for Bighorn Basin at 2-22 and 2-23, Appendix F at F-9.	East	Both	emc0089RM
181.	Recommendations: BLM should provide additional time for submission of ACEC nominations, make full use of this important tool, and consider both general criteria for identifying areas for designation and ACECs already under evaluation. While the FS lacks this specific management tool, the FS can designate reserves or Research Natural Areas to achieve similar results.	East	Both	emc0089RM

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182.	8. THE AGENCIES SHOULD DESIGNATE RESEARCH NATURAL AREAS In addition to ACEC designations, BLM and FS should determine appropriate sites for Research Natural Area (RNA) designation which is intended to: (1) preserve examples of all significant natural ecosystems for comparison with those influenced by man; (2) to provide educational and research areas for ecological and environmental studies; and (3) to preserve gene pools of typical and endangered plants and animals. RNAs are intended to represent the diversity of North American ecosystems with their biological communities, habitats, natural phenomena, and geological and hydrological formations. RNAs can help BLM and other agencies maintain current data and records of sage-grouse habitat and population changes. RNAs are largely used for non-manipulative research and baseline data gathering on relatively unaltered community types. In addition to the benefits RNAs could provide researchers and managers, these protected areas also safeguard essential habitat types that will be preserved in their natural state for future generations.	East	Both	emc0089RM
183.	Recommendations: The FS should consider the following three mechanisms, in no order of priority, to provide adequate regulatory mechanisms in Land Management Plans to conserve greater sage-grouse: 1) designating Research Natural Areas in areas with high priority greater sage-grouse habitat and intact sagebrush ecosystems (see section 8 of these comments); 2) developing and applying a new management prescription focused on conservation of greater sage-grouse and sagebrush ecosystems, which implements the National Technical Team recommendations as minimum standards; and 3) developing and applying new forest-wide standards that implement the recommendations of BLM's National Technical Team as minimum standards for protecting and recovering habitat for the species. In addition, the agency must help protect sage-grouse populations by carefully managing activities and projects on national forest lands that are adjacent to lands with occupied sage grouse habitat in other ownerships, using any or all of the above mechanisms, as appropriate for site-specific areas.	East	USFS	emc0089RM
184.	Therefore, in order to maximize conservation benefit given other competing values, we recommend protective management of priority habitat (which should include enough habitat to conserve at least 80-90% of the existing population), along with designation of ACECs informed by the following additional criteria: ACECs can be designated for habitat, but also for historic, cultural and scenic values. BLM should prioritize ACEC designation for lands that contain priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. This approach will allow BLM to ensure that ACECs maximize protection of multiple sensitive resource values benefiting a range of user groups.	East	Both	emc0089RM
185.	I. BLM Should Designate Areas of Critical Environmental Concern Where Appropriate Areas of Critical Environmental Concern (ACECs) - an administrative designation made within the BLM through land use planning - highlight areas where special management attention is needed to protect, and prevent irreparable damage to important historical, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards (BLM Manual 1613). This designation should be applied to important priority habitats from development and other anthropogenic disturbances with potential to negatively impact sage-grouse in each RMP planning area in the Eastern region.	East	Both	emc0167RM
186.	Based on these facts and the criteria noted above, GYC encourages the BLM to use the ACEC designation as a regulatory mechanism to conserve sage grouse and sage habitat throughout the Eastern region where appropriate.	East	Both	emc0167RM

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187.	Incorporate Special Designations: Apply designations such as Areas of Critical Environmental Concern and Research Natural Areas to protect critical habitat.	GB	Both	emc0355GB
188.	The Secretary of the Interior must give priority to the designation and protection of Areas of Critical Environmental Concern (ACEC). See 43 U.S.C. §1712(c)(3) This designation should be applied to protect important priority habitats from development and other anthropogenic disturbances with potential to negatively impact sage-grouse. In some states with peripheral populations and fewer birds, this could include all or a substantial proportion of priority habitat. Such designations should be applied with strict management guidance so that sagegrouse conservation is the primary objective. ACECs are an administrative designation made by BLM through a land use plan—therefore this is an appropriate designation to incorporate within RMP revisions and BLM Land Use Planning. The ACEC designation is unique to BLM and it can be applied to areas with important natural or historic characteristics. Areas with important fish and wildlife resources, including but not limited to habitat for endangered, sensitive, or threatened species, or habitat essential for maintaining species diversity, are available for nomination and designation.9 Summary: BLM should use the criteria outlined below to identify areas of high biological value for sage-grouse that can be permanently set-aside from large-scale development and managed with emphasis on not only maintaining, but enhancing greater sage-grouse populations. Areas that meet the criteria outlined below also meet BLM's relevance and importance criteria for ACEC designation.	GB	Both	emc0355GB
189.	As a starting point, BLM should delineate areas of particularly high biological value for greater sage-grouse, which may be a subset of the priority habitat, depending on how priority habitat is delineated in each state, and on the overall size and distribution of the populations in a given state. Doherty et al. (2009) identified core regions of sage-grouse abundance by estimating the smallest area necessary to contain 25, 50, 75, and 100% of the breeding population within 5, 12, 30, and 60% of the eastern sage-grouse range. They define an area as having high biological value with respect to conservation planning if the area is in the top 3 groupings of breeding densities: 25, 50, and 75% core regions, as these groups contained 75% of the regional breeding population, in only 30% of the eastern sage-grouse distribution. They defined areas in North and South Dakota as having high biological value even in 100% core regions, because these fringe populations experience the highest risk of extirpation. Even with inclusion of 100% core regions in North and South Dakota, this results in classification of only 31% of the eastern sage-grouse distribution as high biological value. These high biological value areas could be used as a starting point for identifying areas that meet the criteria for ACEC designation. This methodology for identifying areas of particularly high biological value is focused only on nesting/breeding habitat, because Doherty et al. (2009) did not have information on other seasonal habitats.10 Thus, particularly in states that have relevant information on other seasonal habitats (from mapping of seasonal habitats, and use of radio-marked birds to document seasonal habitat use and migration), areas that are of high biological value withrespect to meeting all seasonal habitat needs should also be identified and used as a starting point for ACEC designation. Ideally, BLM should designate all of the area within the 75% core areas delineated by Doherty et al. (2009), plus any additional seasonal habitats that are needed to protect 75% of the existing population, as ACECs that are permanently set-aside from large-scale development and other activities with potential to negatively impact greater sage-grouse populations. These ACEC's should be managed with the goal of not only maintaining, but enhancing greater sagegrouse populations. In some states, where there are small, peripheral populations, BLM should designate ACECs to include the area needed to protect 100% of the population (100% cores delineated by Doherty et al.	GB	Both	emc0355GB

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	(2009) plus any additional seasonal habitats used by the population).			
190.	At a minimum, we recommend protective management of priority habitat (which should ideally include the area needed to conserve 90-100% of the existing population), along with designation of ACECs according to a combination of the following additional criteria, in order to maximize conservation benefit: - Prioritize ACEC designation in relatively large contiguous areas that are: 1) within areas of high biological value, 2) currently un-developed, and 3) un-encumbered by valid existing rights, and/or have low potential for development.11,12 In Wyoming, areas with no existing leases comprising at least eleven contiguous sections are specially protected from new leases . This number could be used as a starting point, but should be scaled such that smaller contiguous areas are considered in states with smaller populations than Wyoming, as well as in areas where there are few remaining 11 contiguous square mile areas that are not subject to valid existing rights. - Consider including relatively large contiguous acreages of lower biological value areas that currently are un-developed, and un-encumbered by valid existing rights, and/or have low potential for development. This may be important when such areas increase the size and continuity of the areas described above, or where there are limited areas that meet the previous criteria. Doherty et al. (2009) suggest that these areas represent low conflict opportunities for sage-grouse, and note that such areas may be important, for example, to maintain connectivity to other high value core regions. - Once the above areas have been mapped, work to maximize the spatial continuity and size of designated ACECs. - As noted previously, ACECs can be designated for habitat, but also for historic, cultural and scenic values. Prioritize areas that incorporate priority habitat and other vulnerable resources, such as wilderness characteristics, other endangered species, or cultural resources. By using this approach, BLM can assure that designation and management of ACECs will maximize protection of the many resources that the agency is obligated to manage. Consider Audubon's Important Bird Areas for ACEC designation or other high level habitat protection that ensures no to minimal disturbance.13	GB	Both	emc0355GB
191.	In addition to ACEC designations, BLM and FS should determine appropriate sites for Research Natural Area (RNA) designation which is intended to: (1) preserve examples of all significant natural ecosystems for comparison with those influenced by man; (2) to provide educational and research areas for ecological and environmental studies; and (3) to preserve gene pools of typical and endangered plants and animals. RNAs are intended to represent the diversity of North American ecosystems with their biological communities, habitats, natural phenomena, and geological and hydrological formations. RNAs can help BLM and other agencies maintain current data and records of sage-grouse habitat and population changes. RNAs are largely used for non-manipulative research and baseline data gathering on relatively unaltered community types. In addition to the benefits RNAs could provide researchers and managers, these protected areas also safeguard essential habitat types that will be preserved in their natural state for future generations.	GB	Both	emc0355GB
192.	The Greater Yellowstone Coalition and Montana Audubon nominate all BLM lands identified as core sage grouse habitat by Montana Fish, Wildlife and Parks within the BLM Dillon Resource Area as an Area of Critical Environmental Concern (ACEC) (See enclosed map: "Proposed ACEC Boundaries to Protect Core Sage Grouse Areas"). This potential ACEC is in Sage- Grouse Management Zone IV and in large part encompasses all of the seasonal habitats supporting southwest Montana's population of Sage-Grouse. While much of the population can be found yearlong in the proposed ACEC, in extreme winters some portion of the population also migrates south to Idaho in areas not covered by this nomination. Management Zone IV contains one of the highest reported densities of Greater Sage-Grouse (Fed. Reg. 3/4/10).	MT-RM	BLM	emc0248GB

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193.	As a starting point, BLM should delineate areas of particularly high biological value for greater sage-grouse, which may be a subset of the priority habitat, depending on how priority habitat is delineated in each state and on the overall size of the populations in a given state. Doherty et al. (2011) identified core regions of sage-grouse abundance by estimating the smallest area necessary to contain 25, 50, 75, and 100% of the breeding population within 5, 12, 30, and 60% of the eastern/Rocky Mountain region sage-grouse range. The authors define an area as having high biological value with respect to conservation planning if the area is in the top three groupings of breeding densities: 25, 50, and 75% core regions, as these groups contained 75% of the regional breeding population, in only 30% of the eastern sage-grouse distribution. They defined areas in North and South Dakota as having high biological value even in 100% core regions, because these fringe populations experience the highest risk of extirpation. Even with the inclusion of 100% of the core regions in North and South Dakota, this results in the classification of only 31% of the eastern/Rocky Mountain sage-grouse distribution as high biological value. These areas should be used as a starting point for identifying areas that meet the criteria for ACEC designation. Because Doherty et al. (2011) did not have information on other seasonal habitats, this methodology is based only on nesting/breeding habitat. Thus, particularly in states that have relevant information on other seasonal habitats (from mapping of seasonal habitats and use of radio-marked birds to document seasonal habitat use, such as winter range, and migration), areas of high biological value with respect to meeting all seasonal habitat needs should also be identified and considered for ACEC designation.	ND	Both	emc0089RM
194.	ACEC Proposal: Bi-State PMU's ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas. FLPMA directs the secretary of the Interior to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values … giving priority to ACECs …". ACECs are to be designated in areas "where special management attention is needed to protect and prevent irreparable damage to important historic, cultural and scenic values; fish, wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards." (43 USC § 1702(a) 43 CFR 1601.0---5a).	NVCA	Both	emc0348GB
195.	ACEC Proposal: Butte-Buck-White Pine PMU ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0350GB
196.	ACEC Proposal: East Valley, Schell-Antelope PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0351GB
197.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over	NVCA	Both	emc0351GB

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	time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. The Proposed East Valley, Schell-Antelope ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock-associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage-grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has			

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	qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses - so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts. The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. sion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change. In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage-grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
198.	ACEC Proposal: Islands, O'Neil Basin PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied	NVCA	Both	emc0353GB

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	sage---grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.			
199.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may	NVCA	Both	emc0353GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel			

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	will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
200.	ACEC Proposal: Kawich PMU ACEC Proposal BLM must designate ACECs that protect occupied sage---grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0354GB
201.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will	NVCA	Both	emc0354GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration.			

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	Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
202.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and	NVCA	Both	emc0358GB

Table C-12
Comments Related to Special Management Areas

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in			

Table C-12
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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
203.	ACEC Proposal: Santa Rosa, Desert, Eden Valley PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0359GB
204.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on	NVCA	Both	emc0359GB

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	important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native			

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	ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM o discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
205.	ACEC Proposal: Quinn PMU ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0360GB
206.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat	NVCA	Both	emc0360GB

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	security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy,			

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	defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased			

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	out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
208.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure,	NVCA	Both	emc0363GB

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	composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A			

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	practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
209.	ACEC Proposal: Shoshone, Cortez, Three Bar, Diamond PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0364GB
210.	ACEC Proposal: Stillwater, Clan Alpine, Desatoya PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0365GB
211.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in	NVCA	Both	emc0365GB

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	Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and			

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	other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
212.	ACEC Proposal: Toiyabe, Reese River, Monitor PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0366GB
213.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators.	NVCA	Both	emc0366GB

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	Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of			

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	FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
214.	ACEC Proposal: Virginia-Pahrah PMU ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0367GB
215.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause	NVCA	Both	emc0367GB

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	for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline			

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	defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
216.	ACEC Proposal: Tuscarora, North Fork PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.	NVCA	Both	emc0368GB
217.	Sage-grouse ACECs: Protect the complex of seasonal habitats required by sage-grouse. Provide for viable populations over time. Allow for integrated management to prevent further fragmentation, and to implement passive and active restoration and rehab to recover essential habitats like springs that provide critical brood rearing habitat that are on the verge of being	NVCA	Both	emc0368GB

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	lost altogether in this very arid landscape. Provide habitat security for sage-grouse during lekking and nesting periods. Limit disturbance, stress and displacement of birds from winter habitats. Relevant Values The Proposed ACEC meets the criteria of having Relevant values. Significant wildlife and other resources are found here. These are significant and substantial values. The qualities are of more than local significance. They are of special worth, consequence, distinctiveness and cause for concern. NDOW identified these lands as important for populations of sage-grouse. The values of the Proposed ACEC are greatly threatened by livestock disturbance and livestock- associated vegetation treatments and infrastructure. Livestock disturbance, facilities and vegetation treatments promote weed invasion, especially cheatgrass. Livestock water facilities and trampling promote West Nile virus. Livestock presence and facilities subsidize nest and egg predators. Livestock disturbance promote further desertification and add to stresses caused by climate change which are predicted to adversely impact the Great Basin and this land area. Climate change is expected to amplify adverse impacts of livestock grazing, further stress waters, and promote cheatgrass and other invasive species. See Fleischner (1994), Belsky and Gelbrad (2000), Connelly et al. 2004, USDI Pellant 2007 Congressional Testimony, Knick and Connelly (2009) Studies in Avian Biology. Poor management decisions by agencies, and a series of deeply flawed segmented livestock grazing and facility actions, have torn apart the fabric of the sagebrush landscape in many areas, including very important sage-grouse habitats of the ACEC. The uplands, including mature and old growth Wyoming big sagebrush communities are critical for sage-grouse nesting. The black sagebrush, along with Wyoming big sagebrush, is at times critical for wintering habitats. The fragile, small streams, springs and seeps, and associated sagebrush habitats, provide essential sage-grouse brood rearing habitat. These, and higher elevation mountain big sagebrush communities, are all greatly threatened by continued livestock grazing disturbance which occurs at high levels during sensitive periods that conflict with sage- grouse needs for habitat security. These high levels of grazing are also degrading soils and microbiotic crusts which are essential as a frontline defense to prevent invasive species like cheatgrass. These high levels of grazing also degrade native vegetation structure, composition and function, deplete forbs, reduce essential native bunchgrass nesting cover, and cause other adverse impacts. Agencies have also allowed mining exploration and development, and energy development to intrude on important and essential sage-grouse seasonal habitats. The complexly interspersed sagebrush habitats have nationally significant values. They are essential habitat for the existing declining population of sage-grouse. They provide critical connectivity with neighboring PMU's and opportunity for genetic interchange. Their further degradation by livestock and any intensified mining, energy or other development will increase fragmentation and serve to further isolate birds and populations. Loss of this PMU would further isolate sage-grouse in neighboring areas. There are identified leks within the Proposed ACEC. These areas are critical for the survival of the birds and livestock grazing during lekking season may disrupt breeding activities. Livestock associated infrastructure may provide perches for raptors which prey on breeding sage grouse. Livestock disturbance of vegetation may reduce the quality and quantity of escape cover used by breeding sage grouse. Important Values The Proposed ACEC meets the criteria of having important values. The Proposed ACEC has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern especially when compared to any similar resource. The Proposed ACEC has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. These lands have suffered 150 years of livestock grazing disturbance. This has resulted in large losses of riparian area and water			

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	flows. Large-scale historical mining disturbance, and deforestation and other impacts have also occurred. Uplands have suffered large amounts of soil erosion, reducing site potential. Any continued livestock grazing disturbance occurs in a landscape that has been altered by historical uses – so adverse impacts of even smaller amounts of disturbance to remaining lands, waters, and sage-grouse habitats may be amplified. The Proposed ACEC has microbiotic crusts, which are a frontline defense against weed invasion, are very fragile and readily damaged by livestock trampling and cross-country motorized disturbance. Their disturbance promotes invasive species that alter natural processes and fire cycles. Whisenant 1994, Belsky and Gelbard (2000), USDI BLM Belnap et al. 2001 Technical Bulletin on microbiotic crusts The Proposed ACEC should be recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandate of FLPMA. Benefits of the Protection of Relevant and Important Values Habitat Recovery Will Provide Long-term Viability for Sage-grouse and Other Sagebrush-dependent Species. Invasion of cheatgrass is alarming. Unfortunately disturbance and desertification associated with livestock grazing has continued, and has been intensified by facilities disturbance, salting, and overstocking. These lands are of local, regional and national significance for conservation and recovery of sage grouse and other rare and sensitive species populations. Fragmented and Disconnected Habitat; Sage Grouse Habitats Require Passive Restoration for Recovery. Springs, springbrooks, intermittent drainages, and overall water quality and quantity are jeopardized by grazing practices and now climate change In the past, agencies have treated sagebrush and other upland areas as throwaway landscapes. Sagebrush has been "treated" and subjected to continued chronic grazing disturbance. Uplands have been carved with new fences. Livestock spring developments, water pipelines have proliferated. Agencies have adopted a disjointed, piecemeal approach, and treated uplands as sacrifice area. Management Actions This ACEC must be withdrawn from locatable, leasable and fluid mineral development. New rights-of-way will not be allowed for energy, transmission or other infrastructure or developments. Existing ROWS will be amended. Livestock grazing will be phased out of occupied habitats over a period of three years. In any areas where grazing might continue longer, Appendix A practices will be applied. Livestock infrastructure, including fences, spring developments, pipelines, stock ponds and other harmful facilities will be removed (active restoration). Livestock and other disturbed areas will be seeded with local native ecotypes of shrubs, grasses and forbs. Native upland and riparian vegetation communities will undergo passive restoration, where natural processes return as a result of stopping activities that degrade them or prevent recovery. Spring and stream flows will be restored to their natural condition to the maximum extent possible as developments are removed through active and passive restoration. Sagebrush manipulation/treatment is prohibited. Selective hand-cutting of conifers only in areas where they are shown to conflict with sage- grouse needs will be allowed. Mastication, chaining, and other treatments involving use of large machinery are prohibited. (Active restoration). Ownership of all public lands will be retained. Travel will be restricted to designated roads. No utility corridors will be designated. Existing utility corridors may be retained. Maintenance activity for these areas will be carried out with minimal disturbance. All lands will be managed as VRM 1 or 2. We request a meeting with BLM to discuss this ACEC proposal, and its incorporation into this Sage-grouse EIS process.			
218.	ACEC Proposal: Vya, Sheldon, Massacre, Buffalo-Skedaddle, Black Rock, Pine Forest PMU's Combined ACEC Proposal BLM must designate ACECs that protect occupied sage-grouse habitats across the landscape that are necessary for sage-grouse to fulfill all their seasonal needs to sustain viable populations in the short, mid and long term. In areas where BLM and the Forest Service (or USFWS or other federal agency) lands together provide critical linked habitat, special	NVCA	Both	emc0369GB

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	designations must span artificial administrative unit boundaries. The Forest too must designate RNAs, Reserves or Conservation Areas.			
219.	Much of the intact habitat for sage-grouse in Nevada is in Wilderness, WSAs, and roadless areas	NVCA	BLM	emc0401GB
220.	It is important to do everything possible to keep those big unspoiled areas as intact as possible	NVCA	BLM	emc0401GB
221.	So much of the decline in number of birds is due to the loss, degradation and fragmentation of sagebrush habitat. When you look at NDOW's Greater Sage-Grouse Categorization Map, one of the striking things is that the largest blocks of "essential/irreplaceable" and "important" habitat are largely found in Wilderness, BLM and US Fish and Wildlife Service WSAs, and/or Forest Service Roadless areas. A good example of this is the northwestern portion of Nevada in Washoe County and northwest Humboldt County. Large portions of the Sheldon National Wildlife Refuge were recommended by the Service for wilderness; BLM in Nevada has numerous wilderness study areas from Sheldon Contiguous, Massacre Rim, Wall Canyon, Poodle Mountain, Buffalo Hills, Twin Peaks, etc.; and of course, all of BLM's designated wilderness High Rock Canyon region. These large protective designations have helped hold a strong core of habitat together. I hope the EIS will look at the role designated wilderness and proposed and future wilderness can play in the long-term effort to protect sage-grouse.	NVCA	BLM	emc0401GB
222.	When you look at some of the WSAs in northwestern Nevada (information pulled directly from the BLM website) you can see that many of the WSAs in "essential/irreplaceable" and "important' sage-grouse habitat would lose some of the strongest protection measures possible if legislation like this is passed due to their "non-suitable" recommendation. One of the largest factors in the "non-suitable" recommendation of many of these areas was the number of private inholdings within the WSA boundary. Over the past decade, most of these inholdings have been acquired. As this EIS moves forward, I hope that there will be an opportunity for the BLM to look at the values to sage-grouse from these "non-suitable" WSAs, and what could be lost with HR1581-type legislation. NOTE: this letter includes 3 tables, as referenced, from the BLM website.	NVCA	BLM	emc0401GB
223.	In the recent Douglas County Public Lands bill process, the Douglas County Commission ecognized the importance of the Burbank Canyons WSA to the bi-state population of the sage-grouse, and despite BLM's "non-suitable" recommendation, the commission is supporting this area for wilderness to help protect sage-grouse.	NVCA	BLM	emc0401GB
224.	Incorporate Special Designations: Apply designations such as Areas of Critical Environmental Concern and Research Natural Areas to protect critical habitat.	OR	Both	emc0385GB
225.	What will be the impacts or effects of the proposed juniper Encroachment management plan on Existing valued Visual and Aesthetic qualities and Management Objectives in regions now defined within Areas of Environmental Concern (AECS) in the Vale, Lakeview and BLM Districts?	OR	Both	rmc0036GB
226.	As a starting point, BLM should delineate areas of particularly high biological value for greater sage-grouse, which may be a subset of the priority habitat, depending on how priority habitat is delineated in each state and on the overall size of the populations in a given state. Doherty et al. (2011) identified core regions of sage-grouse abundance by estimating the smallest area necessary to contain 25, 50, 75, and 100% of the breeding population within 5, 12, 30, and 60% of the eastern/Rocky Mountain region sage-grouse range. The authors define an area as having high biological value with respect	SD	Both	emc0089RM

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	to conservation planning if the area is in the top three groupings of breeding densities: 25, 50, and 75% core regions, as these groups contained 75% of the regional breeding population, in only 30% of the eastern sage-grouse distribution. They defined areas in North and South Dakota as having high biological value even in 100% core regions, because these fringe populations experience the highest risk of extirpation. Even with the inclusion of 100% of the core regions in North and South Dakota, this results in the classification of only 31% of the eastern/Rocky Mountain sage-grouse distribution as high biological value. These areas should be used as a starting point for identifying areas that meet the criteria for ACEC designation. Because Doherty et al. (2011) did not have information on other seasonal habitats, this methodology is based only on nesting/breeding habitat. Thus, particularly in states that have relevant information on other seasonal habitats (from mapping of seasonal habitats and use of radio-marked birds to document seasonal habitat use, such as winter range, and migration), areas of high biological value with respect to meeting all seasonal habitat needs should also be identified and considered for ACEC designation.			
227.	The BLM must also consider the effects of restrictive management, such as lands with wilderness characteristics or ACECs against the need for proactive projects such as those promoted by the Utah Partners for Conservation and Oevelopment.	UT	BLM	emc0337GB
228.	History has shown that in the case of Resource Management Plan revisions in Wyoming's BLM Pinedale Field Office, several publicly nominated ACEC's (Wind River Front, The Mesa, The Cottonwood Areas) were not included in alternatives within the 2008 draft RMP. The agency cites in an evaluation of ACECs that these areas met relevance criteria but did not meet importance criteria (BLM Pinedale, 2007). As sage grouse management EISs proceed, GYC strongly recommends a review of the importance criteria for these and other potential ACECs in the Eastern region; it should be clear that "importance criteria 1" (locally significant qualities) and "importance criteria 3" (national priority concerns) are now applicable to these areas. As noted elsewhere in these comments, sage-grouse require large, interconnected expanses of sagebrush. While there is a seasonal component to their habitat requirements, sage-grouse rely year-round on sagebrush-dominated landscapes with varying sagebrush canopy covers, densities and heights, age classes, patch sizes, and moisture availability. Sage-grouse are a landscape-scale species, meaning they use these large, ecologically diverse sagebrush-steppe habitats and are particularly vulnerable to land-use and resource-harvesting practices that alter this habitat.	WY	Both	emc0167
229.	Each Field Office should bring forward at least two sage grouse Area of Critical Environmental Concern candidate areas, and the sage grouse Plan Amendment EIS is the most appropriate vehicle (rather than concurrent RMP revisions) to consider such ACEC nominations. ACECs are an integral part of the overall sage grouse conservation package for each Plan, and the overall sufficiency of the sage grouse protection package as a whole should be up for evaluation under the Sage Grouse Plan Amendments EIS. With this in mind, the Rock Springs Field Office's stated intention to withdraw its candidate sage grouse ACECs from the Plan Amendment process and instead pursue it in the RMP revision is a misguided one.	WY	Both	emc0343GB
230.	In addition, a sage grouse Long-Term Ecological Research (LTER) area should be established to serve as a research and reference area for scientific study. We recommend the lands to the south of Green Mountain in the Red Desert as a potential LTER site.	WY	Both	emc0343GB

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1.	Fire and nesting and breeding are the biggest threats to sage-grouse funther decline.	All	Both	cfc0002GB
2.	Couple this with grazing cuts and increased fires since 1980 and there you have simple statistical analysis of the 3 reasons for sage-grouse decline.	All	Both	cfc0002GB
3.	Fire will need to be addressed in the plan. The plan should have a very aggressive approach to fire in sage grouse habitat.	All	Both	cfc0004RM
4.	I agree with the NTC recommendation about not controlling big sage in precip. Ares less than 12". In fact, I would recommend that fire not be used in less than 15" precip. Zones. Too much chance of cheatgrass invasion in low precip. Areas.	All	Both	cfc0017RM
5.	National Tech Recommendation of retiring grazing permits would be very counter- productive from many standpoints. Most importantly from the s. grouse perspective- there would be many more fires that would wipe out sagebrush -Duh!	All	Both	cfc0018RM
6.	To help preserve the sagebrush, you should strongly consider mowing, burning, etc. strips - to make it easier to control wildfires. That way the whole area would be lost.	All	Both	cfc0018RM
7.	Veg Management #2 Fire- can probably live with that. Need to consider "wildfire" management.	All	Both	cfc0025RM
8.	#2 Failure to maintain grass and brush in low enough density (through livestock grazing) to prevent huge fires.	All	Both	cfc0041
9.	Science- proves there was fewer acres burned in Nevada in 1950-1970 why? The obvious answer, livestock grazed the fire fuel off. Yes, there is a balance.	All	Both	cfc0046GB
10.	Since wildfire is the#1 threat to sage-grouse and their habitat -Please include grazing with cattle and sheep in the strategy plan to help reduce the fire threat.	All	Both	cfc0050GB
11.	One of the most important thing the BLM has to do is the "pasturizing" of the burn areas. Return the burn areas to the same native plants.	All	Both	cfc0058GB
12.	But complete 100% native plant restoration in burn areas is critical.	All	Both	cfc0058GB
13.	First of all, since fire is the #1 destroyer of sage-grouse habitat, I think that we should figure how to prevent desert fires. One of the best ways to prevent fires would actually be to more intensively graze the forage with sheep and cattle. The BLM has so many regulations on the grazers that don't allow the livestock to be on the grass long enough to take it down to a less fire hazardous length. Better management of the land could do a lot to prevent fires. Also I have heard that BLM workers actually go start fires on the desert. That is rediculous!	All	Both	cfc0068GB
14.	My comments are going to be directed towards sage-grouse and cattle grazing co-habitation. I feel that they co-habitation. I feel that they co-habitat very well, and if cattle are not allowed to graze on BLM land, there will be an increase in fires due to the amount of dry grass which fuel huge fires.	All	Both	cfc0069GB
15.	The plan must address the impact of wildfire on sage-grouse habitat and prescribe ways to reduce wildfire occurrence and improve control techniques	All	Both	cfc0070GB
16.	Also, stop planting crested wheatgrass and other non-native plants as part of fire rehabilitation.	All	Both	emc0009RM
17.	The presence of a ranching community using BLM allotments increases the chances of catching a wildfire when it starts, which reduces the amount of big sage brush habitat lost. If economic and political forces undermine this community, they	All	Both	emc0013RM

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	also undermine grouse habitat.			
18.	Because big sage brush can be permanently destroyed by fire, any change in grazing should take into account the increased risk of fire.	All	Both	emc0013RM
19.	In areas where sage grouse currently thrive, the RMP should make no changes to current grazing, road use, and fire-suppression practices.	All	Both	emc0013RM
20.	I am really concerned about the total devistation caused by the enormous wild fires over the past several years. I'm not seeing any of the usual animals that generally frequent these areas jackrabbits, cottontails, etc). Nor am I seeing the gamebirds that frequented the waterholes and scrubbrush . As far as sage grouse are concerned , can they be re-introduced into their former destroyed habitat?	All	Both	emc0027GB
21.	Radio news tells me that policies removing cattle grazing have resulted in the destruction by fire of over 75% of the sagegrouse habitat in states to the west of us. The judge responsible for trying to protect sagegrouse by removing grazing has decided some grazing may be necessary, but it is a little late. Big sage can take more than 100 years to recover from fire. Do not make that mistake!	All	Both	emc0028RM
22.	It is possible the overgrazing may have helped the sagegrouse by protecting big sage from fire. It certainly did not seem to depress sagegrouse numbers. This overgrazing due to roving graziers of "free grass" was the main reason the Taylor Grazing Act was enacted. Next, the BLM was formed and has worked with established ranchers to create the conditions we have today. It is a success story that should not be ignored. Do not repeat the mistakes made in surrounding states and destroy sage grouse habitat.	All	Both	emc0028RM
23.	Encourage livestock grazing to keep the range from being burned out due to the build up of fire fuels	All	Both	emc0032GB
24.	In addition to energy development and disease, sagebrush-steppe habitat quality may be impacted by grazing practices, invasive species and resulting changes in the frequency and severity of fires.	All	Both	emc0034RM
25.	Decreases in the quality of habitat may have direct impacts on greater sage-grouse populations. WWF encourages the BLM to address the potential impacts of climate change on the spread of invasive plants, particularly cheatgrass (Bromus tectorum), which may highly alter the quality of habitat by outcompeting native grasses and forbs and causing increased frequency and severity of wildfires, which are detrimental to fire-intolerant sagebrush species.	All	BLM	emc0034RM
26.	When sagebrush burns now the resulting fires tend to be very hot and intense, burning almost all of the sage and associated vegetation, leaving little habitat for sage grouse in the scorched areas. It can be 20 years before the burned sites return to sagebrush and are suitable for grouse again. Or, as a result of fire suppression in the last 50 years, the sage is a monoculture of old and stagnant plants, occupying 50 - 70 percent of the site, or more. There are few grass and forb plants because they are out-competed by the older sagebrush plants. Consequently there is little food for hens and chicks in this environment, and they suffer. When the hens and chicks suffer, the whole population suffers. Either way (scorched earth or protected from fire) the resulting habitat is not suitable for sage-grouse.	All	Both	emc0043GB
27.	Your paper work shows fire as the biggest threat, well then leaves the roads alone as they make fire breaks and access to put fires out if started.	All	Both	emc0045GB
28.	Using fire to reduce sagebrush has become more common In contrast, following a 9-year study, indicated that prescribed	All	Both	emc0057GB

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	burning of Wyoming big sagebrush during a drought period resulted in a large decline (>80%) of a sage grouse breeding population in southeastern Idaho. Additionally, documented loss of leks from fire reported that burning mountain big sagebrush stands had long-term negative impacts on sage grouse nesting and brood-rearing habitats. Canopy cover in mountain big sagebrush did not provide appropriate nesting habitat 14 years after burning.			
29.	Manage breeding habitats to support 15-25% canopy cover of sagebrush, perennial herbaceous cover averaging >18 cm in height with (7 inches) >15% canopy cover for grasses and >10% for forbs and a diversity of forbs Habitats meeting these conditions should have a high priority for wildfire suppression and should not be considered for sagebrush control programs.	All	Both	emc0057GB
30.	no more prescribed burns unless they clearly and specifically are initiated and designed to enhance native wildlife habitat.	All	Both	emc0058GB
31.	Conduct under burns in the pine and fir stands to reduce the fuel load within the Mt. Dome Area of Critical Environmental Concern. This will aid in preventing catastrophic fires on the mountain top and losing the entire stand of timber used by nesting and wintering Bald Eagles in the Klamath and Tule Lake basins.	All	Both	emc0061GB
32.	Wildfire and its extent are directly related to fuel loading and the absence of fuelbreaks. The only realistic tool the agencies have in reducing the fuel load is through a well managed grazing program. Wildlife will not adequately harvest fuels and manual removal is cost prohibitive. Grazing public land is essential if wildfire is to be minimized. Prescriptive grazing can be a tool that could be used to break up fuel loads. There are lots of grazing options. Designed fuel breaks using existing infrastructure and promoting fire resistant vegetation that is strategically located is important.	All	Both	emc0070GB
33.	Fragmentation is listed as a focus. Will there be an analysis of where, when and how fragmentation on public lands is occurring? If wildfire is determined to be a major cause of fragmentation how will it be controlled by regulation? How will any new wildfire regulation be coordinated with the many other regulations on fire? It would seem that if man's activities are the cause of fragmentation that a projection of planned or possible projects might help in the analysis.	All	Both	emc0071GB
34.	Fire - USFWS notice indicates that increased regulatory mechanism's need to be in place to adequately address the effects of wildfires or invasive plants. We are confused as to how a regulatory mechanism will be developed that requires BLM staff to target the protection of key sage-grouse habitats and at the same time protect the safety of fire fighters? How can or will this be addressed in a balanced manner in the EIS?	All	Both	emc0071GB
35.	Restoring ecosystems will require a new approach to natural disturbance processes. In particular, BLM and FS must change they way they manage ecosystems before, during and after fire.	All	Both	emc0078GB
36.	FIRE Fuels ISSUE: The proposed Conservation Measures fail to address post restoration management in sage brush habitat experiencing woodland encroachment. Many contracted woodland treatment areas don't have post treatment in the form of prescribed burn or mechanical whip removal due to cost and/or a lack of understanding of pinyon-juniper ecology. When the larger trees are cut, it releases the smaller and the effect of the woodland on the understory returns within a few years. Post treatment in woodlands needs to be listed as a strategy or BMP.	All	Both	emc0083GB
37.	Fire Operations ISSUE: The proposed Conservation Measures fail to address the need for improved coordination between Type III, II and I teams during a wildfire handoff When a wildfire is handed off from a Type III to a Type II or Type I team, discussions of guidelines related to a particular species and habitat like sage grouse occur only in a scattered manner, often	All	Both	emc0083GB

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	as a downplayed after thought. Local federal biologists sometimes have to work very hard to give input into a changeover briefing and often are left out of the loop entirely because whether that discussion occurs is up to the IC who may or may not allow it to be held. Having a dedicated sage grouse advisor won't necessarily change this fact			
38.	ISSUE: The proposed Conservation Measures fail to address the fact that non-federal fire personnel who are involved in BLM / USFS wildland fires may be in command positions. Federal agency fire personnel are pretty good about trying to use agency program guidelines when they can during a wildfire on their home units and other places when they're made aware. However, many wildfires now involve state and even local volunteer firefighters. These people are often in command positions; coordination with them on something like sage grouse guidelines may not occur. Non-federal personnel often just order things done like the immediate use of bulldozers and don't coordinate with federal firefighters – even on federal lands. They often don't know and don't care about Conservation Measures the federal agency is mandated to use. Even if coordination does occur, the state and locals don't incur the risk and challenges of ESA listing that the federal agencies do; there is no downside for ignoring these	All	Both	emc0083GB
39.	HABITAT RESTORATION ISSUE: Use of late seral vegetation typing as the standard for land management agencies ISSUE : Use of vegetation mapping that has too coarse a filter to pick up crucial riparian microsites Good condition mid-seral and low / early seral vegetation are as important to sage grouse as high / late seral vegetation to supply all of their life cycle needs. However, for example, Natural Resource Conservation Service (NRCS) soil / vegetation mapping has typically been used as a standard for rangeland management in BLM. NRCS vegetation typing is done using high / late seral vegetation as the standard. It is generally silent on describing low / early and mid seral vegetation that is important for grouse and important for habitat enhancement objectives. Are we sure that the greatest abundance of forbs and insects needed by sage grouse isn't produced in a good condition / low seral vegetation community? References like NRCS don't break out the thousands of small acreage riparian areas that are crucial to sage grouse for brood rearing and connectivity habitat in more arid areas. Federal biologists need to be able to use any reference available, that gives assistance on describing seral vegetation communities; the LUP must state that NRCS, USGS references will be used, but so other sources can also be used.	All	Both	emc0083GB
40.	In many parts of the western United States, fire and non-native, invasive species are primary threats to sage-grouse habitat. Consequently, the BLM and FS's efforts to develop sage-grouse conservation measures should focus on addressing these causes of habitat diminution. For example, the BLM should consider the extent to which fuels management programs and rehabilitation of fire-impacted areas may provide benefits for sage-grouse habitat. In addition, modification of suppression and fire management strategies and practices should be considered.	All	Both	emc0084GB
41.	In the Form, fire appears to be considered a subordinate factor in sage grouse survival (6 pp). Grouse loss through elimination of food and shelter is noted, but immediate deaths from burning and suffocation receive no discussion. Other research and observation indicates immediate fire losses may be significant (Strickler, 2012). From the view of a taxpayer, the agencies apparently do not encourage grazing down fuel loads, nor do they assess wildlife loss due to wildfires.	All	Both	emc0087GB
42.	By agency policy ravens are now provided subsidized hyperpredation of sage grouse. By agency policy, fire potential cannot be substantially reduced since grazing down fuel loads requires lengthy bureaucratic permission rather than a rancher's immediate seasonal decision.	All	Both	emc0087GB

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43.	Predation control through either poisoned bait (eggs) or small bore firearms can be immediately effective. Fire control through free-market grazing decisions of cattlemen or sheep growers can be effective in protecting sage grouse within one climate season. Bureaucratic habitat control will take no less than multiple budget cycles, and personnel reviews, before any agency even begins to be an effective advocate for the benefit of sage grouse.	All	Both	emc0087GB
44.	The apparent agency refusal to seriously consider predation and fire in the survivability of the sage grouse assures not only the endangered species listing of the sage grouse, but in fact the actual endangerment of the species. Extinction will not be the fault of the rancher nor the hunter nor the industrial worker. Sage grouse extinction will be the fault of the politically-correct scientist and the politically-correct bureaucrat.	All	Both	emc0087GB
45.	In actuality, from my observations the primary loss of Sage Grouse population in northeastern Nevada is due to loss of habitat caused by the many range fires over the past years. This has had nothing to do with mining. If you drive along I-80 you can see tens of thousands of acres that are now covered by cheat grass instead of sage and forbs. In comparison mining operations take up only a tiny fraction of this acreage.	All	Both	emc0091GB
46.	Lastly, I am an environmentalist at heart. I believe we need to be good stewards of our environment. I believe we should do what we can to assist nature in restoring the habitat that has been burned by wild fires	All	Both	emc0091GB
47.	There are numerous USFS allotments that are within Sage Grouse habitat or adjacent to that have huge fuel loads due to the Western Pine Beetle. The FS has failed to address any location except in the near proximity of housing. These areas need to have controlled burns or selective thinned to reduce the potential for devastating fires on or near habitat. The funding for restoration is primarily spent for administrative with limited funding for 'on the ground' efforts. The habitat studies should include any and all potential fuel loading threats, regardless of whether they are BLM, USFS, IDL, INEL, and etc.	All	Both	emc0112GB
48.	Page 28 of the NTT Report states: "In fire prone areas where sagebrush seed is required for sage-grouse habitat restoration, consider establishing seed harvest areas that are managed for seed production (Armstrong 2007) and are a priority for protection from outside disturbances." In the 1980s there was a Bureau-wide effort to identify native plant seed reserves on public lands, including for lower-elevation sagebrush. From a historical perspective, it would be useful in the EISs to present their current status, how successful their protection from outside disturbances (including fire) has been, and the degree to which they have actually been used for procuring seed.	All	Both	emc0113GB
49.	The County supports utilizing more Fuels Management funding to address at-risk priority habitat using all possible means (herbicide, mechanical treatments, grazing, stewardship contracting, etc.).	All	Both	emc0130GB
50.	The County supports fire suppression efforts and focus should target protection of high quality enact sage-brush habitat as a priority immediately after protection of life and property.	All	Both	emc0130GB
51.	Use fire and brush control and renovation to improve habitat.	All	Both	emc0137GB
52.	Sage brushes greatest threat is not cattle, it is fire. And what fuels fire and spreads it besides wind? Grass. If cattle are not allowed to graze the land, the grass will only get thicker providing more fuel for a fire. Thus resulting in more sage brush being burnt and the habitat of sage hens being destroyed. Cattle are the best friend of sage hens and sage brush. It's merely common sense	All	Both	emc0141GB

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53.	Fire ManagementlReseeding. Fire has increased in Iron County as invasive species (cheat grass) increases. More and more habitat is burned each year. The BLM has a good fire suppression policy, and are quick to reseed before the coming winter so that native grasses and forbs can become established before noxious weeds. The Utah Division of Wildlife Resources provides seed in the critical sage grouse habitat areas through a cooperative program. Iron County recommends that the BLM not change the current program of fire suppression and reseeding, but look at it as a model other areas of the country can use.	All	Both	emc0142GB
54.	In conclusion the key to restoring Sage Grouse populations is early and full suppression of fires, restoration of the burnt area with native shrubs and grasses, and controlling predators like coyotes, foxes and wolves.	All	Both	emc0145GB
55.	The two biggest threats to sage grouse habitat areas are wild fires and large ever expanding prairie dog towns. The USFS and the BLM are both very negligent in their efforts to control the destruction of sage grouse habitats by the wild fires and they have made no attempt to control the complete obliteration of sage grouse habitat areas caused by the expanding number of prairie dogs.	All	Both	emc0148GB
56.	Over time, the federal government has been changing how they prioritize WUI projects near private or non-federal ownership properties. Therefore, protecting private property from fires from public lands and public lands from activities on private land is needed again to be evaluated here to become regulatory in nature to get credit, especially when dealing with sage grouse habitat. At least one alternative needs to address this issue.	All	Both	emc0149GB
57.	WUI priorities need to be addressed in this EIS. WUI projects need more local decisions to be made as to where is the best place to spend the available funds versus decisions made from across the country. At least one alternative needs to address this issue.	All	Both	emc0149GB
58.	The idea of fire rehabilitation and restoration efforts and proximity of private or non-federal ownership lands is also a concern. One alternative needs to address the needs to do more rehabilitation and restoration efforts along those boundaries as a way to protect those properties in the future and protect public land resources from fires originating on those properties. This would be a good place to use fire retardant species. With the way wildfires have been growing in size and intensity, this would be a good place for protecting sage grouse habitat away from their actual locations.	All	Both	emc0149GB
59.	Use of fire retardant species need to be clearly and fully evaluated in this process. This is especially true to break the increasing fire size and intensity trends.	All	Both	emc0149GB
60.	If fire is the number one threat, then you need to do more than make it a national priority. As long as life and property are the number one priorities and a rural fire department asks for help, you need to address whether you are going to respond to their fires that are threatening life and property or stay on a sage grouse habitat priority fire. Readers need to see in the DEIS how you plan to respond to multiple fire starts in your proposed plan, especially in this scenario. Remember, you cannot plan or afford to have enough fire fighters and trucks or other equipment to come out of this predicament alone. For the benefit of all taxpayers, you need to plan for average fire years and not extremes.	All	Both	emc0149GB
61.	To reduce fire impacts will require partners. Don't alienate those that want to help. Think out of the box here. At least one alternative needs to address how to increase the training and capability of rural fire departments, volunteers, partners, etc. over the life of these plans and to be regulatory enough to be counted as a positive impact for sage grouse and their habitat.	All	Both	emc0149GB

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62.	As you indicated in your handouts, sagebrush can take 25-120 years to return. That is if you can stop fire right now and invasive species in the short-term. You need to address the reality of fire intervals in the past, present and expected in the future. That will lead you to address what the fire interval impacts are if they stay the same or get even shorter in years to come.	All	Both	emc0149GB
63.	As we all know if fire returns, you set your expectations back the similar number of years since the last fire or if they have occurred often enough, to the point it can't come back without significant human intervention and funds. Your impact section needs to address this clearly for the reader. It also needs to address the impacts of agencies planting sagebrush, the success they have had or not and issues about it and how to protect those new plants in the short and long-term from fire. Protection here is from subsequent fires that may kill plants or hinder their ability to reproduce.	All	Both	emc0149GB
64.	You need to address various widths and types of fire breaks in your alternatives. We all know narrow breaks cannot stop a fire that is roaring towards it from miles away, but it can stop or slow a fire that starts adjacent to it for crews to work from.	All	Both	emc0149GB
65.	If you want to help the sage grouse, you have to recover the habitat. Sometimes that means letting a fire burn out some of the invasive juniper, etc.	All	Both	emc0157GB
66.	The County supports emergency stabilization of habitat areas affected by wildfire; however, maintenance of critical ecological processes should be a higher priority than simply re-planting native species only.	All	Both	emc0160GB
67.	I have multiple suggestions for the BLM to integrate into their Sage Grouse Plan. They include: 1) Wildfire policy. Although a let it burn policy works well in most forest fire instances, sage brush steppe isin a steep decline due to large fires and invasive weeds. It is imperative that we try to minimize wildfires on range land by increased fire suppression action as well as developing fuel breaks around all existing key	All	Both	emc0164GB
68.	From your presentation, it seems that the critical issue is habitat (sagebrush) loss due to fire. With that in mind, I suggest you review your management of wildfires. Most of these are, were and have always been started naturally by lightning strikes. What has changed in modern times is the control of grazing and regulation of fire fuel. I know this played a critical role in the fire that nearly burnt Tuscarora this year. Fuel and fires can be better managed. If this is the critical factor in sage-grouse habitat, this should be the focus.	All	Both	emc0174GB
69.	I'm a big proponent of habitat enhancement for this bird species via prescribed burns that stimulate historic natural fire patterns, along with other measures, such as light-on-the-land, sustainable grazing methods (or complete cow restriction in some fragile areas). The type of land stewardship will of course also benefit many other native lifeforms in our region's sagebrush steppelands.	All	Both	emc0189GB
70.	Wild fires are always a possibility and we have had a number of them through the years. It has only been in the last 25 years that a wild fire in our area would burn overnight. Now in the last 10 years we have had numerous fires that have burned for days and are burning 25,000 to 68,000 acres at a time. If they take the cattle off the range there will be a great deal of fine fuel and it will not be if it burns, but when and how much. These fires will be hotter and larger than the fires that we have now and that will not help the sage grouse much either.	All	Both	emc0207GB
71.	Livestock grazing has the benefit to the rangeland of reducing the fine fuels load to help with fire prevention and control. If grazing is halted or significantly reduced there will be absolutely nothing to keep the rangelands from turning into an inferno	All	Both	emc0208GB

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	that has never been witnessed before. This scenario will be of great harm to all wildlife.			
72.	We encourage BLM to recognize and address the following in the EIS and in plan revisions: 1. The importance of addressing existing threats from wildfire and invasive species encroachment, particularly juniper encroachment.	All	BLM	emc0212GB
73.	While we in the West will never be able to be free from wild land fires that impact not just the public lands but the private lands as well, we can look at "bottom up · assessments of local areas driven by State fish and wildlife and grazing users in cooperation with local BLM districts and their range cons to assess the most appropriate management approaches on an area by area basis to truly achieve habitat improvement	All	Both	emc0213GB
74.	I know more habitat can be saved with minimal changes in fire suppression policy. I saved some areas on our ranch with a little effort with my dozer. I witnessed BLM back-burning to create a buffer that in my opinion was overkill and resulted in large areas of habitat that were burned that did not need to be.	All	Both	emc0215GB
75.	The documented Preliminary Analysis published by the USGS suggests that the decrease of sagegrouse populations in the Virginia Mountains of NW Nevada is due to frequent wildfires which has altered the habitat by destroying the sage brush and other perennial grasses that are used by the sage grouse for cover. Wildfires negatively affect our cattle operations as well as the sage-grouse survival	All	Both	emc0232GB
76.	On page 25, Wildfire Suppression, Fuels Management and Fire Rehabilitation section of the NTT report indicates that wildfire has resulted in significant habitat loss for sage-grouse. Yet quick response to fires is critical in managing the size of the fires and the intensity of the fires, and the BLM and USFS want to close roads that would facilitate quick response. The conservation measure to close roads in high priority sage-grouse habitats (page 11) is in direct conflict with effective wildfire suppression. This is just one of the many conflicting issues in this document. Grazing as a fuel reduction tool can be useful where grasses are the fuel that carries fires, but limiting grazing in sage-grosue habitats conflicts with the conservation measures of reducing fuels.	All	Both	emc0239GB
77.	Increase grazing by cattle, sheep, and horses to bring the over abundant fuel load of cheat grass and other non-native species of plants down to end the danger of catastrophic wildland fires. Managed and rotated grazing has beneficial effects for the sagegrouse by removing woofy dead grasses and stimulating softer forages.	All	Both	emc0241GB
78.	Keeping the wildfires to manageable sizes can help sagebrush stands develop faster and sustain communities longer.	All	Both	emc0241GB
79.	The use of prescribed fire to reduce fuels loads or enhance sage grouse habitat must be addressed in the RMP amendments.	All	Both	emc0242GB
80.	Cooperative conservation measures should focus on restoration of rangelands that have been negatively affected by catastrophic fires, along with well-designed and well-managed grazing plans.	All	Both	emc0247GB
81.	Specifically, management prescriptions for this proposed ACEC should implement the conservation measures recommended by the Sage-Grouse National Technical Team in December, 2011 (SGNTT, 2011). Recent publications have exhaustively documented the special conservation actions needed to sustain Greater Sage-Grouse in the American West (SAB 2011). Because this proposed ACEC includes priority/core sage grouse habitat, we recommend the following special management to address activities that will fragment the sage-steppe habitats upon which the greater sage-grouse depends: Wildfire and fuels management: Because the proposed ACEC includes priority Sage-Grouse habitat, the Technical Team's recommendations with regard to fuels management and fire operations should be implemented within the boundaries of	All	BLM	emc0248GB

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	the ACEC (SGNTT 2011).			
82.	Indeed, human disturbances of all sorts, roads, railways, fences, reservoirs, towns, homesteads, farms, mines, etc. flourished in the early to mid 1900s, and so did the sage-grouse. The mere presence of human activity seems to have little biologically relevant connection to sage-grouse population trends. However, specific human activities appear to correlate positively with GSG population trends. Livestock grazing management, with its associated intensive development of meadows, hayfields, and surface water sources increased markedly in the Great Basin in the late 1800s and early 1900s, and GSG populations boomed. During this period, high livestock densities (both sheep and cattle) reduced fine wildfire fuel loads across the Great Basin, and wildfires were rare and small. High densities of livestock dung also supplied an abundance of insect activity, particularly in closely grazed meadows and riparian areas, and the close grazing stimulated succulent new herbaceous growth and increased the forb component in these meadows and riparian areas, thereby increasing the quantity and quality of the forage supply for sage-grouse. At the same time, concerted predator control was practiced. In fact, predator control was encouraged, subsidized, and implemented on a vast scale by the Federal and State governments. By the mid 1900s, Federal and State regulations were implemented and all of the grazing management practices discussed above were controlled and moderated. The GSG population boom moderated at about the same time. By the late 1960s, livestock numbers and grazing levels were significantly scaled back across the west, and predator control programs were largely curtailed. Fire fuel levels increased, and the incidence of large-scale wildfires rose exponentially. GSG population trends reversed and started to rapidly decline.	All	Both	emc0251GB
83.	Thus, intensive livestock management which diminished the frequency and size of wildfires, and concerted predator control which greatly reduced GSG loses to these killers, are management actions in the Great Basin that seem to be highly relevant to the biology of the GSG and help explain the trajectory of their populations over time. As shown in Figure 1 on page 17 herein, it is reasonable to assume that a return to effective management to increase livestock grazing levels, reduce fire fuel loads and wildfire impacts, and increase predator control would result in another significant upward trend in GSG populations. In contrast, proposed GSG conservation measures to provide heavier cover levels through further livestock grazing reductions, and the lack of conservation measures to address ever increasing predation levels, are a prescription to assure that GSG populations will ultimately decline. Heavier cover for GSG translates to higher fire fuel loads across the landscape, and substantial fuel loads make large-scale wildfires inevitable in many sagebrush communities. Repeat burns increase the likelihood that plant communities will shift toward cheatgrass dominance, which in turn increases wildfire frequency, eliminating the ability of sagebrush communities to re-establish. Thus, conservation measures that intend to benefit GSG by providing them with more hiding cover will ultimately harm the species by converting significant swaths of existing habitat to annual grasslands that provide no habitat value for GSG. This will concentrate the remaining birds in an ever shrinking area, making them more vulnerable to poorly controlled predator populations.	All	Both	emc0251GB
84.	Enhance Current Populations Alternative Given the fact that current GSG populations exceed the minimum effective breeding population by 70 to 107 times, it is clear that GSG are not at imminent risk of extinction, and therefore do not legally qualify for listing as "endangered" under the ESA. The FWS Findings express concerns regarding rapidly declining GSG populations between the late 1960s and late 1980s, and continued downward population trends (although at a slower rate) from the late 1980s to the present. The FWS Findings fret that such downward trends in GSG populations may	All	Both	emc0251GB

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	threaten the species with extinction at some point in the future. Given the recent (1985 – 2007) rate of decline of 1.4% annually (FWS Findings, 3 page 13922), it would take 300 to 330 years for the current greater sage-grouse population (350,000 to 535,000 birds) to shrink to the minimum effective population (as high as 5,0000 birds). Theorizing about what might happen three centuries from now reaches well beyond the foreseeable future. Thus, the FWS Findings expression of concern about long-term outcomes from the continuation of recent GSG population trends does not rise to a determination that the species is threatened with extinction in the foreseeable future. A concern that populations may reach levels small enough to put them at risk of extinction at some point in the future does not meet the legal requirement to allow listing under the ESA unless the risk is likely in the foreseeable future. Given current circumstances, any such risk for GSG is likely 300 or more years distant, so the species does not legally qualify for listing as "threatened" under the ESA at this time. Nevertheless, it is reasonable to consider an alternative that would facilitate an increase in GSG populations, so long as that alternative does not negatively impacting existing socioeconomic uses occurring on BLM and FS administered lands. An analysis of the past management history within the Great Basin indicates that GSG flourished when livestock grazing levels were significantly higher than they are now. During this same period, large wildfires in the region were very infrequent (likely due to lower wildfire fuel levels as a result of close grazing), and concerted predator control measures were practiced. These management actions could be put into practice again to benefit GSG without harming the existing socioeconomic climate, but rather enhancing it. In fact, it is reasonable to argue that the FWS Findings get it wrong when they conclude that there is a lack of regulatory mechanisms in place to protect the GSG. Instead, many of the regulatory mechanisms currently in place are harming the species. For example, regulations restricting livestock numbers and use levels increase fire fuels across the Great Basin, and these regulations have resulted in a dramatic increase in large wildfires in the region in recent decades, which has destroyed GSG habitat to the detriment of the species. Repeated fire has led many sagebrush communities to convert to cheatgrass dominance, which assures that the habitat will remain unfit for GSG into the foreseeable future. Rules restricting predator control, regulating the use of poisons and baits, and protecting ravens have resulted in excessive GSG loses due to predation. Whenever a species like the GSG with a relatively low reproduction rate (FWS Findings, 3 page 13916) loses the vast majority of its eggs to predation, and can trace more than 80% of the mortality of those individuals that manage to hatch to predation (FWS Findings, 3 pages 13930, 13971, and 13972), its populations can be expected to decline. Again, it appears that existing rules are harming GSG populations, not a lack of adequate rules.			
85.	1) Fire suppression and fire management to protect sagebrush habitats will be critical to protecting sage grouse populations (the high desert conditions are what they are we cannot undo a campfire gone wrong maintaining access to the sage grouse's habitat is vital and necessary	All	Both	emc0257GB
86.	In the memory of older ranchers, many more cattle and sheep grazed the range lands than are allowed to today due to the many restrictions placed on ranchers. During this time, there were also many more sage grouse. At that time, grazing kept wild fires from destroying millions of acres of wildlife habitat. Fires have become a devastating problem in recent times, due to drastically restricted grazing and a huge build-up of un-used forage that creates fuel for these massive fires. Not only do fires destroy the necessary habitat and coverage for the nesting areas, they also kill any birds or wildlife in their path. A less restrictive approach to livestock grazing would greatly aid in saving the lands that the sage-grouse live on as well as all other	All	Both	emc0273GB

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	animals that use the areas as well.			
87.	2.4. Fire In the Form, fire appears to be considered a subordinate factor in sage grouse survival (6 pp). Grouse loss through elimination of food and shelter is noted, but immediate deaths from burning and suffocation receive no discussion. Other research and observation indicates immediate fire losses may be significant (Strickler, 2012). From the view of a taxpayer, the agencies apparently do not encourage grazing down fuel loads, nor do they assess wildlife loss due to wildfires.	All	Both	emc0274GB
88.	Fire has been a continual threat to sagebrush ecosystems across the West. Both wildfires and prescribed burns have taken a toll on sagebrush habitat, and have led to extirpations of sage-grouse from otherwise suitable habitat. Although some authors have suggested that fire may benefit sage-grouse, there is virtually no empirical evidence supporting these claims. Most studies have concluded, rather, that fire can have devastating impacts on sage-grouse habitat and survival.	All	Both	emc0276GB
89.	Because wildfires kill many of the native vegetative species of sagebrush-steppe ecosystems, wildfires have been identified as a primary factor associated with sage-grouse population declines. For example, one author has suggested that range fires destroyed approximately 30 to 40 percent of sage-grouse habitat in southern Idaho (MZ IV) in a five-year period. Sage-grouse are so sensitive to fire, in fact, that sage-grouse have been documented extirpating leks within 33.6 miles (54 km) of a fire. The threat of wildfires is ongoing and likely to continue indefinitely.	All	Both	emc0276GB
90.	Management agencies also use prescribed fire in sagebrush habitat, which can lead to negative impacts on greater sage-grouse. Prescribed fire is often used to control annual grasses, to facilitate growth of grasses and forbs, to reduce density of sagebrush, and to control juniper and pinyon woodland expansion into sagebrush habitats, largely with the aim of benefitting other wildlife species. Because prescribed fires often take a toll on habitats available for greater sage-grouse and other sagebrush-dependent species, it is not surprising that use of prescribed fire is one of the most contentious issues in management of sagebrush habitats. At least one author has reported that between 1997 and 2006, prescribed fire was used on more than 370,000 hectares (914,000 acres) of public lands, mostly in Idaho and Oregon. The amount of sagebrush habitat lost due to prescribed fires is relatively minor when compared to loss incurred by wildfires, but considering the fragility of the declining populations of the greater sage-grouse, the rationale for using prescribed fire warrants a closer look at whether the benefits really outweigh the negative effects.	All	Both	emc0276GB
91.	Additionally, fires have cumulative effects that lead to more detrimental effects on sagebrush habitats. For example, fire may increase the spread of invasive plants which may then persist over native plants that would provide necessary understory for sage-grouse. The spread of invasive plants is intensified by other activities, including the use of mechanical and chemical treatment on lands, domestic livestock grazing, fencing and other infrastructure, recreational use of lands including use by off-highway vehicles, and climate change.	All	Both	emc0276GB
92.	Recovery of sagebrush lands impacted by fire is long-term and may often take decades or even centuries. Species composition, pre-burn site conditions, fire size and intensity, fire frequency, and availability of seed sources all play a role in the ability of sagebrush habitats to recover. Additionally, site specific variable such as soil characteristics, previous disturbance history, pre- and post-fire patterns of precipitation, climate, and the presence of other activities such as domestic livestock grazing may affect recovery capacity. Due to this complexity, the dynamics of recovery following fires may differ between natural and prescribed fires and are extremely difficult to predict. Without readily available sagebrush	All	Both	emc0276GB

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	habitat, most sites affected by fire are of little to no value to sage-grouse prior to recovery.			
93.	• Protection of intact sagebrush communities: "Protection of intact sagebrush communities" should recognize that the integrity of the ecological site may include various phases with little to no sagebrush, allowing sagebrush to reestablish in an appropriate time period. This type of management or vegetation treatment sustains the long-term maintenance of intact sagebrush communities. "Protecting" intact sagebrush communities from disturbance increases the risk of catastrophic fires in the shrub-dominated communities and increases the risk of conversion to non-native annual species, with the subsequent loss of sage-grouse habitat. The term "protection" should be replaced with "management" as these ecological sites are disturbance driven in the Great Basin.	All	Both	emc0277GB
94.	• Large intact sagebrush communities: The definition of large intact sagebrush communities needs to be clearly stated. In the context of the ESD and State and Transition Models, this means maintaining the integrity of the ecological site, which includes various phases of vegetation on the landscape such as a grass-forb phase, a grass-forb/shrub phase, a shrub/grass-forb phase, and shrub dominated phase. It does not mean that large areas of old, decadent sagebrush should be maintained on the landscape. Old, decadent sagebrush cannot be maintained on the landscape as lightning ignitions occur frequently in this vegetation condition and the large intact nature of such stands results in extremely large burned areas that bum with extreme intensity and result in high plant mortality.	All	Both	emc0277GB
95.	We do not advise large prescribed fire in GSG or big game winter ranges in Wyoming big sagebrush, particularly at low elevations and precipitation (less than 10 inches annual precipitation)	All	Both	emc0281GB
96.	We have successfully implemented cool season burns, chemical, mechanical treatments to thin brush and release herbaceous vegetation (Danvir 2005). The overall effect is early seral openings in a sagebrush sea. Hunnicutt 1992 clearly showed that hens selected nest sites in homogeneous sagebrush patches at least 300m in diameter for nesting, but immediately moved broods to highly heterogeneous areas having an interspersion of sagebrush cover and grass-forb dominated feeding areas. Pronghorn populations (Aoude and Danvir 2002) showed similar production and population increases.	All	Both	emc0281GB
97.	Conversely, reducing stocking rates without shortening the grazing period and lengthening the rest-recovery period does little to improve rangeland health, increases fire intensity, and will continue to harm some herbaceous plant species.	All	Both	emc0281GB
98.	Livestock grazing is one of the best tools to improve sage grouse habitat and reduce the danger of fire.	All	Both	emc0286GB
99.	Residual cover is a very fine line. Too much residual cover increases the severity of wildfires. Grazing can help immensely to decrease the severity of wildfires. SRCA agrees, "Proper livestock management (e.g. timing, location, and intensity) can assist in meeting sagegrouse habitat objectives and reduce fuels."	All	Both	emc0289GB
100.	SRCA agrees that TNR should be a tool land managers can use. But these decisions need to be made on a yearly basis since there is no science available to predict future precipitation or temperature. Flexibility in grazing permits needs to happen. The NEPA process is too slow when decisions on the ground need to happen quickly. After TNR was set aside, wildfires became more intense and severe due to fuel buildup (e.g. Murphy Complex Fire, West Basin Fire). SRCA feels that the West Basin Fire damage was disastrous due to the restricted use in SRCA's Willow Creek Pasture; this scenario could-be true of all fires on the Snake River Plain in Idaho_ Lack of flexibility within grazing permits has adverse impacts on	All	Both	emc0289GB

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	sage-grouse in relation to wildfire. It's not rocket science. On years where there is 150% of normal precipitation with favorable growing temperatures, decisions determining use need to be made on the ground or else utilization of fine fuels and other grasses remains 0-5%. This in turn creates high probabilities for extreme hot and devastating fires, thus changing whole ecosystems and burning sagebrush.			
101.	We agree there would be adverse impacts in eliminating grazing. These adverse impacts include invasive species after wildfires. Wildfires occurring where grazing did not occur would be very intense. The Murphy Complex Fire is a prime example. TNR was taken from this area several years ago which led to a devastating fire due to fuel buildup. How many acres of sagebrush burned? SRCA does not agree that permanent retirement of grazing privileges would ever be potentially beneficial.	All	Both	emc0289GB
102.	Livestock grazing is a legal and valid use of public rangelands and is a vital component to the balance of nature. If one looks at the statistics, more rangeland has burned in the past 10-15 years because of the restrictions on the rangeland. If ranchers can't utilize the feed on BLM and Forest Service properties because of this sage-grouse issue, then it will be like adding fuel to an already burning fire. More vegetation will just make a bigger fire! Historical evidence indicates a positive correlation between livestock numbers and sage grouse populations. Grazing keeps the fuel down so there isn't so much vegetation to burn. Sage-grouse don't like to live in burned out areas either. They prefer to live in an area where nature is balanced.	All	Both	emc0290GB
103.	Wildfires have affected sage grouse habitat in recent years. Any reduction in grazing will only leave more fire fuel on the range making the situation worse.	All	Both	emc0292GB
104.	The BLM states fire as the greatest threat to the birds and grazing is the most effective management tool that is available to help control fuels to prevent wildfires.	All	Both	emc0294GB emc0120rm
105.	Limit the use of prescribed fire in priority sage grouse habitat.	All	Both	emc0297GB
106.	The BLM's westwide planning strategy should recognize that the most important existing threats to sage-grouse are wildfire and invasives (particularly juniper encroachment).	All	BLM	emc0298GB
107.	The planning strategy should recognize that juniper mastication is more effective than prescribed burning for improving sage-grouse habitat in many areas. To date, most juniper mastication has been conducted on private lands. The RMP amendments should encourage streamlining the clearance procedures to allow and encourage juniper mastication on public lands.	All	BLM	emc0298GB
108.	The decrease in large fires associated by adequate grass grazing by cattle, and the stimulation of new herbaceous growth and increased forb component that grazing promotes.	All	Both	emc0301GB
109.	Measures that the BLM has the power to enact that will have the greatest benefit to sage grouse numbers are likely maintaining or increasing their access to reliable water sources, reducing wildfire number and severity, and increasing new herbaceous growth and forb diversity. Livestock grazing promotes all these aims.	All	Both	emc0301GB
110.	We do not advise large prescribed fire in GSG or big game winter ranges in Wyoming big sagebrush, particularly at low elevations and precipitation (less than 10 inches annual precipitation). However, our observations have consistently shown that smaller (25-200Ha) openings created in large (>500Ha) expanses of mountain and Basin big sagebrush in excess of 25% canopy coverage and above 2000m in elevation are used as brood habitat by GSG, and (based on increased lek attendance,	All	Both	emc0303GB

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	lek persistence, and new lek development) can increase GSG populations. We have successfully implemented cool season burns, chemical, mechanical treatments to thin brush and release herbaceous vegetation (Oanvir 2005). The overall effect is early seral openings in a sagebrush sea. Hunnicutt 1992 clearly showed that hens selected nest sites in homogeneous sagebrush patches at least 300m in diameter for nesting, but immediately moved broods to highly heterogeneous areas having an interspersion of sagebrush cover and grass-forb dominated feeding areas. Pronghorn populations (Aoude and Oanvir 2002) showed similar production and population increases.			
111.	Whereas fire and other disturbance are part of the natural ecosystem and whereas the natural fire cycle is altered by human intervention, we encourage BLM to consider historical rates of fire and disturbance and allow for controlled measures to replicate or simulate this vital element of our ecosystem. We are concerned that as more focus is turned to GSG, beneficial practices such as controlled burns will be reduced in areas that would benefit. The loss of these practices will lead to decreased forage production, decreased water infiltration, decreased water quality, increased fuel loads and more catastrophic fire events that ultimately harm GSG and are detrimental to other uses of the land.	All	Both	emc0303GB
112.	Evaluate sagebrush habitat for its susceptibility to wildfire. Develop and implement a plan to address the prevention of massive wildfire in critical sage grouse habitat. In areas previously impacted by wildfire, develop and implement a reclamation strategy focused on native, non-invasive species.	All	Both	emc0305GB
113.	Evaluate the synergistic effects of climate on invasive annual grasses and altered fire regime.	All	Both	emc0305GB
114.	NEI recommends that sage grouse habitat be accurately mapped through sound environmental assessment and that more focus be given to proven threats to sage grouse viability, such as invasive species and fires.	All	Both	emc0306GB
115.	The EIS and its alternatives must address and quantify the effectiveness and positive impacts modified fire suppression and fire management strategies will have on current and future sage grouse habitat.	All	Both	emc0310GB
116.	It is recognized by USFWS that fire has the greatest detrimental impact to sage grouse habitat. The EIS must specifically address wildland fire prevention, fire-fighting methods, and the ability to restore fire damaged habitat before implementing other land use prohibitions & restrictions.	All	Both	emc0310GB
117.	The introduction of non-native annual grasses to the fragile ecosystems in the west have caused massive ecosystem transformation. Western Juniper has also become invasive to areas that did not historically have it - due to occasional fire - and has degraded much of prime sage grouse habitat at higher elevations. Many of the ecosystems/habitat in the West are dependent on occasional fire, to maintain ecosystem functionality	All	Both	emc0314GB
118.	Re-introduce fire to ecosystem functioning and management, once large amounts of accumulated fuels are reduced.	All	Both	emc0314GB
119.	Overwhelmingly, the conservation measures identified in the NTT report focus on limiting or restricting the use of federal public lands. The agencies should focus on active management of habitats in a manner that will allow for other land uses. It is well-known that fire, not resource development, poses the greatest threat to sage-grouse habitat. BLM Director Robert Abbey admitted same in testimony before the House Energy and Mineral Resources Subcommittee on March 201, 2012. Therefore, fire suppression efforts throughout the habitat range should receive the highest priority. In addition, agencies should focus their efforts on supporting what is currently working on the ground rather than solely on "regulatory mechanisms."	All	Both	emc0321GB

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120.	On page 25, Wildfire Suppresion, Fuels Management and Fire Rehabilitation section of the NTT report indicates that wildfire has resulted in significant habitat loss for sage-grouse. Yet quick response to fires is critical in managing the size of the fires and the intensity of the fires, and the BLM and USFS want to close roads that would facilitate quick response. The conservation measure to close roads in high priority sage-grouse habitats (page 11) is in direct conflict with effective wildfire suppression. This is just one of the many conflicting issues in this document.	All	Both	emc0322GB
121.	Grazing as a fuel reduction tool that can be useful where grasses are the fuel that carries the fire, but limiting grazing in sage-grouse habitats conflicts with the conservation measure of reducing fuels.	All	Both	emc0322GB
122.	Conservation measures need to focus on real and substantial threats such as wildfire, noxious weeds, and other large scale conversions when they specifically threaten a population seasonal segment. Changes in land-use should not be rigidly restricted or prevented from occurring because many times those changes can have secondary benefits such as breaking up or reducing the risk of catastrophic change particularly wildfire.	All	Both	emc0323GB
123.	Our recommendations for management policies in sage-grouse habitat follow. Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve habitat.	All	Both	emc0329GB
124.	As sage-grouse habitat becomes further fragmented by the increasing frequency of wildfires, restoration will become more important. Sage-grouse have evolved in habitat that has extremely infrequent wildfires, and benefit from the presence of mature sagebrush stands. Habitat fragmentation and alteration due to fire may influence distribution (including lek abandonment) or migratory patterns. We suggest that a funded program be dedicated to identifying sagebrush landscapes that are at risk from fire and that field offices be prepared with a response plan to avoid the conversion of compromised landscapes to ones that are dominated by invasive species following fires.	All	Both	emc0329GB
125.	Livestock grazing on public and private land contributes to the Sage grouse habitats by managing the optimum use of the forage, therefore less dry fuels for wild fires. The EIS and SEIS revisions should clarity that grazing should be used to reduce the risk of catastrophic wild fires and improve forage.	All	Both	emc0332GB
126.	VI. BLM and USFS Must Evaluate a Reasonable Range of Alternatives In light of the different reasons for sage-grouse habitat decline from region to region, and the fact that there remains significant sagebrush habitat in Wyoming and Nevada, each sub-regional EIS should carefully evaluate a reasonable range of alternatives to the conservation measures and regulatory mechanisms proposed in the NTT Report. Some of the contemplated measures may not be necessary or effective in each region or sub-region. Examples of such alternatives include, but are not limited, to the following: The Accelerated Fire Restoration Alternative For regions and sub-regions where recent fires have compromised sage-grouse habitat, the EIS should evaluate an Accelerated Fire Restoration Alternative that assesses the impacts associated with implementing better-funded and more effective fire restoration measures. This is especially important for the EIS to be completed in the Great Basin Region, where wildfires are considered a primary factor in habitat fragmentation.	All	Both	emc0335GB
127.	VI. BLM and USFS Must Evaluate a Reasonable Range of Alternatives In light of the different reasons for sage-grouse habitat decline from region to region, and the fact that there remains significant sagebrush habitat in Wyoming and Nevada, each sub-regional EIS should carefully evaluate a reasonable range of alternatives to the conservation measures and regulatory mechanisms proposed in the NTT Report. Some of the contemplated measures may not be necessary or effective in each	All	Both	emc0335GB

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	region or sub-region. Examples of such alternatives include, but are not limited, to the following: E. The Improved Fuels Management and Fire Suppression Alternative The EIS should evaluate the impacts associated with more effective and better-funded fuels management measures and fire suppression measures when wild fires do occur. This is especially important for the EIS to be completed in the Great Basin Region, where wildfires are considered a primary factor in habitat fragmentation.			
128.	Climate change is projected to impact sagebrush habitats, and also to potentially impact sage-grouse survival and reproductive success. Despite this fact, climate change is not listed as a preliminary issue in the Notice of Intent for the greater sage-grouse planning process. This oversight has to be effectively remedied at the Draft EIS stage, the agency must include a comprehensive analysis of the predicted climate change impacts to sage-grouse and any proposed management regime must take into account the cumulative effect of climate change and other impacts and provide protections sufficient to recover and conserve the sage-grouse despite these threats. Climate change impacts that must be analyzed include, but are not limited to: · Increased temperature and increased precipitation allowing expansion of woody vegetation from higher elevations. · Increased temperature and decreased precipitation shifting the balance toward more drought-tolerant desert plants. · Alteration in fire regime from a warmer climate, which would be problematic for fire intolerant sagebrush. · The spread of invasive annual grasses, such as cheatgrass, which have a very different growth form than the native bunch grasses and can lead to more severe fire. · Drought conditions, which have been shown to negatively impact nest success. · West Nile virus, which may worsen with warmer summertime temperatures that speed the development of the virus within the vector mosquitoes.	All	Both	emc0339GB
129.	Grazing additionally reduces the instances and severity of wildfires (Launchbaugh et al. 2007); improves Sage Grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel1980, Derner et al. 1994, Evans 1996); and can be used to control invasive weeds (Olson and Lacey 1994, Walker et al. 1994).	All	Both	emc0342GB
130.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: - Vegetation structure and composition in the sagebrush ecosystem have undergone major changes since European settlement in part due to human-induced changes in fire regime	All	Both	emc0343GB
131.	Native vegetation communities in Great basin sagebrush steppe did not evolve with grazing pressure (Mack and Thompson 1982). Excessive livestock grazing by domestic livestock during the late 1800s and early 1900s had significant impacts on sagebrush steppe and those effects persist today (Knick et al. 2003). Grazing (in addition to other factors) is implicated in the encroachment of conifers in sagebrush steppe, including western juniper (Juniperus occidentalis) (Kerr and Salvo 2007). Decades of livestock grazing have altered plant communities and soil and reduced productivity in sagebrush steppe (Knick et al 2003). Cattle grazed at "conservative" levels in sagebrush steppe in the northern Great Basin initially selected bunchgrasses in interspaces between sagebrush plants (France et al. 2008). The removal of native species from interspaces by cattle, in conjunction with other factors, appears to facilitate invasion by cheatgrass (Bromus tectorum) into these areas (Reisner 2010). The spread of cheatgrass and other invasive plants into degraded rangelands has accelerated the natural fire cycle and threatens to convert enormous areas of sagebrush habitat into annual grasslands (Wisdom et al. 2005; Miller et al. 2011).	All	Both	emc0343GB
132.	Baker (2006) reviewed the fire history of sagebrush ecosystems and found natural fire to be a rare event, suggesting a fire	All	Both	emc0343GB

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	rotation 325-450 years in length. However, overgrazing across many of the Great Basin states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage grouse rely for food and cover. Approximately 36 percent of the greater sage grouse range is invaded by cheatgrass (Lebbin et al. 2010). Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring invades areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.			
133.	Cheatgrass, an invasive annual grass, is now the dominant species on 100 million acres (158,000 square miles) in the Intermountain West (Rosentreter 1994: 170, citing Mack 1981). It was estimated in 1999 that 25 percent of the original sagebrush ecosystem has been converted to cheatgrass/medusa-head rye (Taeniatherum caput-medusae) annual grassland, and an additional 25 percent of sagebrush steppe has only cheatgrass as understory vegetation (West 2000). Cheatgrass is estimated to spread at a rate of 14 percent annually in the United States (Duncan et al. 2004: 1412, table 1). The conversion of sagebrush steppe to exotic annual grassland has been described as "massive" (Allen 2003) and is expected to continue (Miller et al. 2011; Hemstrom et al. 2002).7 Cheatgrass thrives in disturbed, and especially burned, areas. It can increase fire frequency, favoring itself and potentially inhibiting perennial seedling establishment (Miller et al. 2011). Cheatgrass incursion into sagebrush habitat can lead to an eventual conversion of sagebrush/grass (perennial) community to sagebrush/grass (annual) or annual grass rangeland. In some cases, cheatgrass invasion encourages other exotic species such as medusa-head rye, knapweed and thistle. It was observed in 1979 that annual-dominated communities in sagebrush steppe appears to have crossed a threshold and created its own new equilibrium (Hanley 1979) from which restoration to functional sagebrush steppe would be very costly and difficult (if not impossible) to achieve (Billings 1990).	All	Both	emc0343GB
134.	Prescribed fire is commonly employed putatively to improve sage grouse habitat (such projects are often supported by livestock operators, who typically are primarily concerned with eliminating sagebrush with the misguided belief that this will result in a net increase in forage for livestock). For instance, the Upper Snake LWG reported that the 1,100-acre prescribed burn in the Cherry Creek watershed would benefit sage grouse by improving brood rearing habitat. Sagebrush recovery following such fires takes decades, and can take more than 100 years, causing an immediate reduction in habitat effectiveness for sage grouse in pursuit of some eventual increase in habitat effectiveness at some point in the (distant) future. The net result is that immediate welfare of the sage grouse today is being mortgaged for eventual habitat improvements that are speculative at best. However, unlike pheasants, sage grouse are known to respond poorly if at all to habitat enhancement projects.8 In the WAFWA forum participants noted, "It's important for people to understand that if we are doing habitat projects, it often takes a matter of 10, 20, even 30 years to restore shrub habitat. Habitat treatments that put money on the ground today are speculating on the long-term success of the treatment, and of the sage-grouse response to those treatments. So we'll have to find a way to figure this much longer time frame into our calculations" (WAFWA 2006b: 13). In the absence of rigorous scientific evidence supporting the translation of habitat enhancement projects into increased sage grouse population numbers, the BLM should not consider such projects under its RMPs.	All	Both	emc0343GB
135.	The role of fire in the sagebrush ecosystem, and how (or if) it drives the patch dynamics of the system, is poorly understood at present. A landscape mosaic of burns may not meet the nesting habitat needs of sage grouse (Nelle et al. 2000), and may also fail to meet grouse habitat requirements during other seasons (Wamboldt et al 2002). Large fires of high frequency can extirpate sage grouse populations (Pedersen et al. 2003). In Idaho, reduction of 57% of sagebrush canopy cover resulted in	All	Both	emc0343GB

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	sage grouse population reductions (Connelly et al. 2000b). Thus, it is far from clear that projects which reduce sagebrush density or extent actually benefit sage grouse in the short or long term.			
136.	The spread of cheatgrass, which thrives in the wake of fire (both natural and humancaused) further complicates post-fire sagebrush recovery. Once cheatgrass invasion begins, fires result in pure stands of cheatgrass, which tends to burn on a 2-5 year cycle, preventing the re-establishment of native vegetation. Biologists have observed, "Under current, altered fire regimes, natural re-establishment of sagebrush after burning (especially basin big sagebrush and Wyoming big sagebrush) is unlikely" (WAFWA 2006b: 66). Fires and subsequent cheatgrass invasion were a cause of major habitat loss in many of the sage grouse units in northern Nevada, and risk of large-scale habitat loss was high even in areas that had not experienced major problems in the past.	All	Both	emc0343GB
137.	Many sagebrush "control" projects are undertaken based on the perception that sagebrush stands that are dense or tall produce less forage for livestock and also are poor sage grouse habitat; these habitats are based on entrenched myths that conflict with the scientific evidence at hand (Welch and Criddle 2003). Cooper et al. (2007) found no increase of desirable forbs for sage grouse following prescribed fire, but did find a significant increase in exotic forb and grass species following burns.	All	Both	emc0343GB
138.	In addition, an alternative should be developed that emphasizes fire suppression and predator control.	All	Both	emc0345GB
139.	It could be construed that the NTT may be putting the goal of sage grouse habitat preservation above the creation of fuel breaks that serve as defensible space to protect human safety and infrastructure. Before the BLM adopts this strategy they may wish to consider the social, economic, and environmental implications of a similar requirement that led to the loss of dozens of homes in Stephen's kangaroo habitat during a wildfire in 1993. Fuel breaks can also prevent the spread of fire from developed areas to sage grouse habitat, thus fuel breaks can serve as important conservation measures.	All	BLM	emc0346GB
140.	The use of prescribed fire to reduce fuels loads or enhance sage-grouse habitat must be addressed in the RMP amendments.	All	Both	emc0376GB
141.	Fire. Issue: Unnatural fire has damaged large areas of sage-grouse habitat in recent years. Prescribed fire and post-fire restoration fail to support sage-grouse conservation.	All	Both	emc0391GB
142.	Natural fire intervals in sagebrush steppe range from 35-450 years (Baker 2006), depending on sagebrush type, elevation, aspect, etc., although fire may return more frequently to a given watershed during productive periods (Miller and Tausch 2001). However, a combination of fire suppression and the spread of highly flammable nonnative plants has drastically altered the natural fire regime throughout much of the sagebrush steppe (Baker 2011). Wildfires now burn larger, hotter, and more frequently in lower elevation basin and Wyoming big sagebrush habitats. Little remains in the wake of these fires, and burned areas are often vulnerable to reinvasion by cheatgrass, which can completely occupy a burned site (Chambers et al. 2007; Brooks et al. 2004). Paradoxically, the removal of fine fuels (e.g., by livestock) in higher elevation mountain sagebrush habitats may deprive those sites of natural fire for many years, permitting conifer encroachment in some cases (Miller and Rose 1999). The fire regime in sagebrush steppe has been altered by cheatgrass incursion and harmful land uses, and habitat loss and fragmentation from fire is likely to accelerate (Wisdom et al. 2005c). More than 12 million acres of sagebrush steppe burned in sage-grouse historic range between 1996-2010 (WildEarth Guardians data). Fires, prescribed and natural, have long-term effects (>10 yr) and sage-grouse may continue to avoid burned areas even after sagebrush has	All	Both	emc0391GB

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	recovered (Nelle et al. 2000). Sagebrush may return to preburn occurrence within 15 to 20 years after fire if conditions are favorable (e.g., proximate seed sources, quick seedling establishment, conducive weather, etc.). If not, various sagebrush varieties may require between 30 to 50 years to reoccupy a burned site (Baker 2006; Knick et al. 2005). Wildfire was identified as a threat to sage-grouse by two expert panels and three recent reviews (Connelly et al. 2011: 555-556, Tables 24.1, 24.2). Prescribed fire was also identified as a threat to sage-grouse (Connelly et al. 2011: 556, Table 24.2). Fire within 54 km of sage-grouse leks was associated with lek abandonment—in fact, the probability of abandonment increased 800 percent for each unit increase in fire within 54 km of a lek (Knick and Hanser 2011). While small, infrequent fires can maintain a mosaic of successional habitats that benefit sage-grouse, ecological modeling indicates that frequent, large fires in sagebrush steppe may lead to extirpation of the species (Aldridge et al. 2008). Prescribed fire was not shown to improve habitat characteristics for sage-grouse in Wyoming big sagebrush steppe that was already comprised of shrubs, native grasses and forbs (Rhodes et al. 2010).			
143.	Minimizing wild fires also protects our infrastructure from damage an reduces our need to mobilize crews and equipment to rebuild power lines in areas which may be sage grouse habitat	All	Both	emc0396GB
144.	Probably fire is greatest danger to the sage grouse: controlled grazing is the greatest protection for controlling fire.	All	Both	emc0403GB
145.	Blue Mt. has fallen victim to the thought that fire isn't a good thing (the aggressive Smokey Bear era) and could benefit from the use of controlled or prescribed burns since there is way too much large sagebrush and too thick of populations of sage for sage grouse to flourish. The absence of fire has also allowed pinion and juniper to encroach into the sage brush, this encroachment needs to be addressed and also other methods of sage brush control need to be investigated	All	Both	emc0406GB
146.	Wildfire, invasion of non-native plant species and livestock grazing work synergistically. Yet BLM and other agencies repeatedly try to point to fire and invasive species as threats divorced from livestock grazing disturbance, the most pervasive ecological stress across all parts of the sage-grouse range. Fires are occurring more frequently, and the size and intensity of fires are increasing. Fires reduce or eliminate shrubs, disturb soils, destroy microbiotic crusts, and release nutrients that allow cheatgrass and other weeds to thrive. The end result in grazed landscapes is a paucity of shrub cover, few forbs, a shorter period of green plant material (as fires result in hotter, drier sites with little vegetation to trap snow, shade ground, and block wind), and a longer fire season.	All	Both	emc0411GB
147.	And a basic question: Where was sagebrush present at the time of the older Plan RODs compared to the present? Where did BLM treat lands for forage, fuels, other purposes and what is their condition now? What existing treatments or seedings had been identified in LUPs, and what is their condition now? Following fire: Where, when and how did BLM rehab/restore/treat sagebrush under the Plan? Detailed mapping and analysis must be provided. Where was cheatgrass present, and in what percentage cover? How has this changed in both burned and unburned lands? How soon did BLM allow livestock grazing to disturbance to resume following fire rehab, and what was the outcome? A solid baseline must include all of this type of information.	All	Both	emc0411GB
148.	For over a decade, WWP has been asking BLM not to build post-wildfire fences that enable livestock grazing on nearly every unburned acre. The agency should instead close existing partially burned pastures entirely. Sage-grouse have just lost critical habitats in a fire. Then the grouse, in the remaining habitat they have left, suffer grazing disturbance (often	All	BLM	emc0411GB

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	intensified) as well as new lethal fences off so that intensive disturbance is perpetuated. Agencies must adapt to fire by providing more ungrazed, undisturbed habitat.			
149.	Fire and Fuels WO IM 2011-138 and Appendix F of NTT These provisions are weak and toothless. "Where appropriate .. design fuels projects to protect sage brush ecosystems..This leaves the door wide open to abuse by agency range staffers and managers to do whatever they want. Restore native plants and create patterns[sic] which must benefit sage grouse."This enables further wanton destruction of sagebrush habitats under the guise of creating "patterns." In nearly all instances, the sagebrush landscape has a complexity of natural patterns - as well as many artificial human-caused patterns already. What patterns have been shown to significantly benefit sage-grouse -or pygmy rabbit? There is often natural heterogeneity in sagebrush landscapes that provides a complex natural mosaic. Plant communities arbitrarily deemed "decadent" by agencies have diverse age classes. Grassier areas dry out quickly, and appear to be promoting many frequent fires both immense and small. Areas of grass and seedings are now burning at great frequency in sites across southern Idaho. For example: The 2010 300,000 acres Long Butte fire in the Jarbidge. See WWP Long Butte fire Appeal, describing fire flashing across 300,000 acres of exotic and post-fire seedings with hardly any sagebrush present - in 2-3 days! BLM must fully investigate the role of crested wheatgrass and its post-fire rehab seedings in promoting fire frequency and greatly altered fire cycles.	All	Both	emc0411GB
150.	Under fire prescriptions that minimize undesirable effects on veg or soils (i.e. minimize mortality of "desirable" plant species). an ID team #4 is just Standard Operating procedure. BLM is supposed to have been following #5 all along, and has failed to do so. "Where applicable" incorporate roads as fuelbreaks. These are all standard operating procedure, or common sense. The overarching problem here is the continued effort by BLM to justify burning, mowing, herbiciding and otherwise altering and destroying sagebrush habitats. Long-term habitat losses and weed invasions are the regrettable consequences of BLM continuing current ineffective SOPs - which is really all Appendix F of the NTT contains.	All	BLM	emc0411GB
151.	The language here (p. 71 fuels) is "key" habitats - such as give priority for implanting sage grouse habitat restoration projects in annual grasslands to areas adjacent to or surrounded by key sage grouse habitats. So how is BLM going to do this - when it has discarded the whole Key area concept, and cast aside other areas long identified for restoration with its flawed PPH mapping? Other provisions here appear to promote bulldozing of fire lines - which often an damage cultural and other resources, and wild land areas. BLM must place a moratorium on its destructive and expensive "fuels" projects in the Interim - until a comprehensive plan with mandatory and rock solid safeguards is developed. It must conduct a comprehensive and full evaluation of all existing treatments from 1950 to the present must be provided for each BLM/Forest District. Risk of weed infestation resulting from treatment must be assessed for all areas, as well. This must include full examination of cheatgrass risk, which may have a 5-6 year lag period from the initial BLM disturbance if limited cheatgrass was present pre-treatment. The NTT reads like BLM fire rehab plans from 30 years ago. It allows BLM to continue to use exotic species like the many millions of acres of supposed "placeholder" crested wheatgrass that has been planted, and which now is burning with great regularity and that BLM has refused to remove, restore with native, or even interseed to any significant degree. How many areas have had some crested wheatgrass seeded on them -over all periods of time- for livestock forage and/or fire purposes? Please map these, and overlay mapping of fires and fire frequency.	All	BLM	emc0411GB
152.	The Fire Management BMPs are just SOPs - and have been for over a decade. They have been largely ineffective - as BLM	All	BLM	emc0411GB

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	has used "fuels" concerns to alter, fragment and destroy critical sage-grouse habitats, promoting weeds and grassy hotter, drier desertified sites that also serve to allow intensified livestock impacts. BLM must fully evaluate the habitat losses and fragmentation that have occurred as a result of its projects- and that have spread of cheatgrass and other weeds as a result.			
153.	BLM is not going to be able to prevent large wildfire. Fuelbreaks will not do that, and often promote weeds that fuel frequent fires. And if BLM attempts to engineer a massive series of fuelbreaks, it will only further fragment the sagebrush ecosystem and hasten its demise. So as an alternative, BLM must manage lands to be in the best possible condition using native species. That way, if an area burns, it is naturally more resilient and better able to recover. Livestock grazing must be removed if recovery is to be effective, and to occur without significant risk of cheatgrass and other weeds. Removal of grazing also hastens the speed of recovery. Thus, passive restoration -both before and after fires - is essential to resiliency, and reducing and minimizing the adverse effects of fire on wild land sagebrush habitats. In some instances, active restoration (re-seeding with local native ecotypes) may be necessary. But this must be followed by long-term removal of livestock grazing disturbance.	All	BLM	emc0411GB
154.	NTT Report "Diffuse Disturbance" Category Is An Effort by BLM to Again Avoid Examining or Controlling Livestock Disturbance The NTT report would allow 3% new disturbance in Core Areas. The NTT does not include "diffuse" disturbances. It is hard to understand how a fence is "diffuse" disturbance, or herds of several hundred cows imposed on nesting sage-grouse are "diffuse" disturbance. These are real damaging disturbances to and disruption of physical space. Under this reasoning, exploration for Oil and Gas, or Geothermal, would be a "diffuse" disturbance. After all, the heavy equipment moving cross country crushing vegetation is having an effect similar to a herd of grazing sheep or cattle. There is direct physical intrusion into space, as well as flushing, disturbing and displacing birds and damage to nests from both. The NTT describes livestock grazing and fire as "diffuse disturbances." This makes no sense at all. Fires burn a discrete area, and removes sagebrush cover required by sage-grouse. The effects are long-lasting. They are persistent. They alter, degrade and destroy habitats. This is not a diffuse disturbance, but a discrete, able to be mapped, long-term disturbance. Grazing involves discrete infrastructure and developments that alter habitats in specific, mapable locations. Grazing alters habitat components in specific, measurable ways. It imposes disturbance of livestock and management actions on discrete areas (pastures) for specific periods of time. Intensity of use can be mapped with use pattern mapping and other methods. Agencies apply various typically excessive use standards that are supposed to govern some measurable ways in which grazing alters habitats annually. Agencies measure ecological site inventories, rangeland health assessments, etc. to examine qualitative and at times quantitative ways in which grazing alters sagebrush systems and thus sage-grouse habitats. It cannot merely be considered a generally benign, diffuse disturbance as the IMs and NTT do. Management activities such as placement of salt or minerals, or any other activities that concentrate livestock, can cause long-term disruption and loss of sagebrush that can take hundreds of years to recover, even with a one-time substance placement. See Fite Jarbidge Declaration, with photos showing destruction of mature and old growth big sagebrush due to placement of mineral supplements on BLM lands, for example. This is typically followed by weed invasion. All of this is not diffuse disturbance. Over the course of just one grazing season, dozens if not hundreds of such damaged sites pepper the landscape. Mature and old growth sagebrush is killed, and soils are severely trampled and disturbed. Copious amounts of weed-promoting manure are deposited. The site is primed for weed invasion. Further, livestock trailing to concentrate on watering or other sites	All	BLM	emc0411GB

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	break sagebrush, destroy microbiotic crusts, and where slopes are present, trailing may cause incipient gullying that worsens over time.			
155.	Treated lands continue to suffer intensive grazing or other disturbances, thus retarding or preventing altogether the recovery of sagebrush habitat components. "Mitigation" funds for new projects destroying sagebrush habitat (such as the wind farms, transmission lines, gas pipelines) may be used to deforest large areas, including sites. All such projects (past and continuing/foreseeable) must be evaluated honestly. It cannot be claimed that destruction of important sagebrush habitats can somehow be mitigated by cutting, chaining, or otherwise altering tree habitats until there is understanding and analysis of the ecological value of forests. Projects are being claimed to be sage-grouse projects in areas of minimal importance to sage-grouse. Funds are being diverted to these. Plus, if such projects make formerly forested areas more fire-prone - through creating hotter, drier, windier sites, this is likely to exacerbate fire risks to adjacent or interspersed sagebrush habitats. Deforestation may affect local weather patterns, resulting in hotter, drier, weed-prone, harsher, windier sites more prone to frequent fires.	All	Both	emc0411GB
156.	Were the large-scale fires of 2007 in northern Nevada and southern Idaho fueled/exacerbated by large areas of hotter, drier dead sagebrush, increasingly with cheatgrass in understories? On top of which very dry conditions and very strong July winds played out? The Jarbidge AMS, which was finalized right before the 2007 Murphy blaze, included information from a comprehensive Ecological Site Inventory – the only one that BLM has ever conducted in recent decades. It found that cheatgrass had advanced in many areas of the Jarbidge prior to the Murphy blaze. We can't look back and clearly separate out all the factors involved – but what the Murphy and other unpredictable large fires show is that areas which would under this sage-grouse habitat protection prioritization scheme would have, pre-July 2007 been classified as Core/Priority habitat, can be radically altered by an unpredictable lightning storm. And myriad factors caused by degradation or natural events can also affect habitat and habitat trajectories.	All	Both	emc0411GB
157.	Only by requiring the strongest protective measures when considering new development proposals in sage-grouse habitat will you be able to ensure survival of this spectacular species. To that end, I ask that you require the following conservation measures in the relevant Resource Management Plans and Land Management Plans-Prohibit prescribed burning within priority sage-grouse habitat unless it can be demonstrated that such actions will result in a net benefit to sage-grouse in the short term and long term.	All	Both	flb0000gb
158.	Prohibit prescribed burning within priority sage-grouse habitat unless it can be demonstrated that such actions will result in a net benefit to sage-grouse in the short term and long term.	All	Both	flb0000gb and rm
159.	Don't prescribe fire in priority sage-grouse habitat	All	Both	flf0000gb flf0000rm
160.	I urge you to consider concolidated plan amendments that will: limit the use of prescribed fire in priority sage grouse habitat	All	Both	flg0000gb flg0000rm
161.	We have had 2 major wildfires on our ranch in the last 12 years. I have personally been involved in the suppression efforts on these fires. I know more habitat can be saved with minimal changes in fire suppression policy. I saved some areas on our ranch with a little effort with my dozer. I witnessed BLM back-burning to create a buffer that in my opinion was overkill and resulted in large areas of habitat that were burned that did not need to be.	All	Both	flj0002gb

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162.	We have observed that well-rnanaged livestock grazing is an effective and sustairrable method for combating several of the most significant threats to sage grouse habitat including fuels reduction to mirrimize wild fires and to prevent or rlow invasive species and conifer proliferation. While the ESA does not provide for the cost of a mitigation strategy to preclude its implementation, funding to implement strategie,s is none the less rraturally limited. Our continued ability to serve a broad spectrum of multiple-use industries is crucial to maintaining their ability to provide beneficial habitat managerflent and their financial viability to implement appropriate mitigation ffieasure5. Mininrizing wild fires also protects our infrastructure from damage and reduces our need to mobilize drews and equipment to rehuild power lines irt areas which may be sage grouse habitat.	All	Both	fxc0006GB
163.	Sound scientific research indicates that grazirrg is beneficial to the Ereater sage-grouse and othef flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires" (Launchbaugh er al.2007). It improves greater sage-grouse habitat by increasing the quality and accessibility of forbs for sage grouse (Neel 1980, Derner et al.1994, Evans 1996). [t has also been used to control invasive weeds (Olson and Lacey 1994, Walker et at.1994).	All	Both	fxc0006GB
164.	The EIS and SEIS revi,sioils should clarify that multiple-une management concepts should be used to reduce the risk of catastrophic wildfire, improve forage. refilove invasive species and provide open space. We strongly encourage the agencie.r to prioritize theit focus on public land use, or disuse, which poses a real threat to the greater sage-grduse and its habitat	All	Both	fxc0006GB
165.	We have seen devastating fires in Northern Nevada that have destroyed sage grouse habitat and surely destroyed many birds. Fire control needs to be more proactive and fires need to be controlled before they devastate millions of acres of habitat.	All	Both	fxc0012GB
166.	Controlled burns by the Forest Service and BIM would be beneficial to help create a healthier habitat for Sage grouse and other shrub steppe dependent species by providing a mixed age class of sage brush, shrubs) with a healthy understory. Controlled fires wouldn't be as devastating and destructive as the wildfires we have seen the past few years.	All	Both	fxc0012GB
167.	Sage Grouse don't survive wild fire too well and if that much dry grass is left standing on all of the western ranges you will have a beautiful black charred landscape.	All	Both	fxc0017GB
168.	I really think that if the BLM and the Forest Service would make a concentrated effort to suppress the big fires in the sagebrush and develop and repair water sources, particularly waterholes, that the sage grouse would come back to their former numbers better than if they were listed, which probably wouldn't help them at all.	All	Both	rmc0017GB
169.	Targeted grazing should be allowed and encouraged as a tool for creating fire breaks, controlling weeds, and improving habitat. In some cases, fencing can help facilitate the success of a Targeted Grazing project. Electric and net wire fencing should not fall under the same specifications as other high-impact problem fencing.	All	Both	rmc0025GB
170.	Over the past 30 years the west has encountered wildland fires that have destroyed millions of acres of public and private lands. The wildland fires have destroyed not only sage-grouse habitat but other wildlife and wildlife habitat. Elko County believes that the changes in public land grazing policies that have been implemented in recent years has directly contributed to the catastrophic fires and degradation of much of the public lands in the west. These fires have directly contributed to the loss of wildlife and wildlife habitat including the Greater Sage-Grouse habitat. In 2006 in northern Nevada alone over 11 million acres of public and private lands along with wildlife habitat was lost to wildland fire. These catastrophic fires were	All	Both	rmc0026GB

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	not prevalent nor as severe in the west during the period of time that cattle and sheep livestock grazing was at its peak. The consistent removal, restriction or limiting of livestock grazing has promoted decadent dry fuels that are easily ignited and become enormous wildland fires destroying all in its way.			
171.	The beneficial effects of grazing on sage-grouse and its flora and fauna must be made clear. Deal especially with fire effects, plus forbs community enhancement.	All	Both	rmc0032gb
172.	The Organizations have to question the basic accuracy of the 2010 Charter's summary as only two specific areas under BLM regulatory authority were identified as issues possibly impacting the sage grouse. Reviewing the 2010 Conservation Charter without reviewing the FWS listing decision could easily lead to the conclusion that all BLM planning was found to be equally insufficient in the listing decision. This simply is not the case. The inaccuracy of the Charter will create further confusion of priority regulatory issues and allow targeting of low priority management issues, as the 2010 Conservation Measures are applied at the field office level. The FWS listing decision specifically states: "However, a regulatory mechanism that requires BLM staff to target the protection of key sage-grouse habitats during fire suppression or appropriate fuels management activities could help address the threat of wildfire in some situations ..... however, a long-term mechanism is necessary given the scale of the wildfire threat and its likelihood to persist on the landscape in the foreseeable future,"	All	Both	rmc0033GB
173.	The EIS should identify how much sage grouse habitat has been affected by wildfire vs. how much has been recently directly affected or impacted by industry (e.g., oil and gas, mining, energy developments, geothermal).	All	Both	rmc0035GB
174.	Prior to restricting industry on public lands, the government should make an effort towards restoring fire-damaged areas and restoring sage grouse habitat. Such efforts cannot be piecemeal, but a combined effort across the western U.S.	All	Both	rmc0035GB
175.	In fact the use of Prescribed Fire on the range is a Federal Land Management action to clear lands and make them more productive for the Grazing Industry. It's a practice that has been used for the last 20 years that is now recognized as producing unwanted effects in Sage Grouse habitat.	All	Both	rmc0036GB
176.	The Economic analysis should estimate potential increased costs for fire suppression related to Juniper treatment areas.	All	Both	rmc0036GB
177.	Sage grouse in the West must be evolutionarily adapted to wildfire, as wildfire is integral to sagebrush habitat ecology. Therefore wildfire risk reduction should not be a major focus of sage grouse conservation planning.	All	Both	rmc0039GB
178.	Many permittees have voluntarily implemented adaptive grazing management strategies to encourage Sage-grouse Conservation on their allotments and private lands, and many of the recent permit renewals have included such measures. The Board requests that the BLM make every effort to work collaboratively with permittees to recognize and use grazing as a tool to enhance Sage-grouse conservation. For example, the use of grazing to reduce fine fuel loads and noxious species could greatly enhance efforts related to "integrated vegetation management" and "wildfire suppression and fuels management." Also, prescribed grazing can be used effectively to improve or enhance Sage-grouse habitat as noted in the Report.	All	Both	rmc0050GB
179.	Under "Wildfire Suppression and Fuels Management" The BLM PEIS should analyze developing flexibility in grazing permits or a new means of providing flexibility to remove residual or excess fine fuels on years of high productivity in order to protect enacted Sage-grouse habitat. The same is true in use or selection of planned grazing systems. Complete rest over a given year can result in excessive buildup of fine fuel thereby greatly increasing the risk of especially damaging wildfires.	All	Both	rmc0050GB

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180.	NINTH Persons responsible for public lands management must address the fire issue. How badly have sage grouse been hurt since the late 1970's when the Forest Service and Bureau of Land Management began reducing livestock use on public lands which actions in term have led to ever increasing wildfire frequency and intensity, which in turn has led to the needless destruction of wildlife and wildlife habitat? What percentage of sage habitat important to sage grouse and pygmy rabbits has been lost during the last 20 to 25 years because of increases in wildfire?	All	Both	rmc0054GB
181.	The presence of livestock owners and their employees on the land is a major factor in early detection of invasive species and fires. During fire season, owners are on constant watch.	All	Both	rmc0063GB
182.	Another major issue is the interrelationship of responsible livestock grazing and wildfire management and prevention.	All	Both	rmc0063GB
183.	Pages 16 and 17 in the NTT report suggest that BLM only allow treatments that conserve, enhance or restore sage-grouse habitat. An analysis should be conducted to evaluate the need for age-class diversity in sagebrush communities. We also request that the BLM consider allowing other treatments that are designed to achieve alternative objectives as long as they do not negatively impact sagegrouse habitat. Page 26 recommends that fuels management allow no treatments in winter range. Recommending no treatments in winter range is not realistic for PPH in the North Park basin	CO	BLM	emc0060RM
184.	Many of the best leks are located on old fire scars and yet there are no positive statements about the effects of fire on sage grouse habitat in the Report on Conservation Measures. Fire in the habitat systems across the west is one of the most important factors in keeping that habitat vibrant and productive. The misguided and ill informed, decades long, attempts at fire suppression have led to encroachment by woody plants, basins of decadent over-grown sage, and the occasional uncontrollable catastrophic blaze that sterilizes thousands of acres and in turn facilitates invasive species establishment. Fire needs to be considered as the restorative agent that it is.	CO	Both	emc0061RM
185.	The BLM should consider a 'conservation alternative' that: - Includes conservation measures recommended by the NTT Report, with improvements, including, but not limited to the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with addition of further conservation measures, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,31 thus negating the value of designated priority habitats. Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT.	CO	BLM	emc0070RM
186.	CPW believes the following range-wide threats pose the greatest risk to greater sage-grouse populations and their habitats (not in order of risk): A principal feature of landscape-scale wildfires in sagebrush habitat includes an extreme l y long time frame (25-120 years, depending on habitat type) before the habitat again has the vegetation structure necessary to support	CO	Both	emc0072RM

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	nesting and wintering sage-grouse.			
187.	CPW believes the following range-wide threats pose the greatest risk to greater sage-grouse populations and their habitats (not in order of risk): Prescribed fire as management tool may be appropriate in limited conditions; however, introduction and invasion of exotic weeds resulting from a burn is a major concern for sage-grouse. The long-lasting effects of fire on sagebrush regeneration and growth form and thus, impacts to sage-grouse nesting and winter habitats also need to be carefully considered prior to implementing prescribed fire in sagebrush systems.	CO	Both	emc0072RM
188.	(One of the most important NTT recommendations for Routt NF) "Allow no [fuels] treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around or in the winter range and will maintain winter range habitat quality." Ibid.	CO	USFS	emc0175RM
189.	(One of the most important NTT recommendations for Routt NF) "Monitor and control invasive vegetation post-[fuel] treatment. Ibid.	CO	USFS	emc0175RM
190.	(One of the most important NTT recommendations for Routt NF) "Make re-establishment of sagebrush cover and desirable understory plants (relative to ecological site potential) the highest priority for restoration efforts." Id. at 28.	CO	USFS	emc0175RM
191.	Fire in the west is one of the most important factors in keeping grouse and other wildlife habitat vibrant and productive. Therefore, the value of fire management on the sage grouse habitat should definitely be evaluated within the EIS.	CO	Both	emc0178RM
192.	iv. The BLM and FS should analyze an alternative that provides more protection than that afforded by implementation of the National Technical Team's Recommendations. The BLM and FS should consider an alternative that: - Includes conservation measures recommended by the NTT Report. - Combines this with designations of a subset of priority habitat as Areas of Critical Environmental Concern that receive a higher level of protection than that recommended by the NTT. - Incorporates improvements to the NTT's recommendations, including the following: o Avoid sagebrush reduction/ treatments to increase livestock or big game forage in priority habitat and include plans to restore high-quality habitat in areas with invasive species. o Implement range management practices outlined by the NTT, with improvements, including avoiding new range and water developments that negatively impact sage-grouse and applying the 3% disturbance cap to certain range developments. o Design fuel treatments to protect existing sagebrush ecosystems (including avoiding such treatments where they will harm sagebrush ecosystems) and prioritize fire suppression to conserve the highest quality habitat. o Ensure that disturbance or uses that are permitted adjacent to priority habitat don't negatively impact sage-grouse populations in priority habitat,10 thus negating the value of designated priority habitats. o Include small or isolated populations (such as those along the periphery of the greater sage-grouse's range) in priority habitat, and protect and enhance such populations with science-based prescriptions.	East	Both	emc0089RM
193.	iii. Strong components of Wyoming's approach Wildfire, a major form of disturbance that often is followed by the invasion of non-native species, is being addressed through active fire suppression in core areas. Operators are required to control noxious and invasive weed species, including cheatgrass.	East	Both	emc0089RM
194.	As the large landscapes required to sustain grouse populations, become further fragmented by the increasing frequency of wildfires, focus on restoration will become more important. Sage-grouse have evolved in habitat that has extremely infrequent wildfires, and benefit from the presence of mature sagebrush stands. Habitat fragmentation and alteration due to	East	Both	emc0089RM

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	fire may influence distribution (including lek abandonment) or migratory patterns. We suggest that a funded program be dedicated to identifying sagebrush landscapes that are at risk from severe fire and that field offices be prepared with a response plan to avoid the conversion of compromised landscapes to ones that are dominated by invasive species following fires.			
195.	So called "habitat improvement" projects, such as mechanical sagebrush treatments and prescribed fire, can be detrimental to greater sage-grouse and other sagebrush obligate species. Scientifically defensible research is needed to determine which activities are beneficial. This information should be maintained in a single federal database.	East	Both	emc0089RM
196.	Management of wild and prescribed fires is considered an important issue in maintaining vital sagebrush habitat (Crawford et al., 2004).25 Historically, fire was the primary natural disturbance in sagebrush dominated ecosystems where sage-grouse evolved (Ibid.). The suppression of fire is believed to have changed historic sagebrush systems, encouraged the spread of invasive vegetation, and contributed to the expansion of Western Juniper (Juniperus occidentalis)(Miller and Rose, 1999).26 Western Juniper expansion has changed historic sagebrush steppe habitat to predominately juniper woodland in many areas of the Great Basin, primarily in Oregon (Rowland, et al. 2010). Since 1930, juniper woodlands in Eastern Oregon expanded from 600,000 ha to over 2.6 million ha, resulting in fragmentation and loss of sagebrush habitat (Ibid.). As a result of juniper expansion, BLM has begun to take on projects to control the spread of woodlands into historic sagebrush systems. Availability of sagebrush at local and landscape scales is a requirement for Greater sage-grouse persistence (Johnson et al., 2009). All juniper treatments (including manual removal and prescribed fire) should be undertaken to minimize the spread of invasives, retain the maximum amount of sagebrush and associated native forbs and grasses. A few best practices, which have been used by BLM in Oregon to manage juniper through prescribed burns, include: 27 - Resting treated areas from grazing for a minimum of two grazing seasons - Closely monitoring grazing impacts after livestock are returned to allotments - Scheduling treatments to avoid breeding and nesting periods We encourage BLM to incorporate best practices and ensure that all steps are taken after burns for native vegetation to return. In addition, we recommend a vegetation monitoring program be implemented which includes control plots to exclude livestock grazing so that additional best practices can be established in a scientifically defensible manner. Habitat improvement projects frequently lack rigorous monitoring and evaluation plans, which undermines the ability of land managers and the public to quantify the benefits of management actions (Whisenant, 1999). Summary: BLM should identify a clear benefit to sage-grouse and a restoration plan with quantifiable objectives before practicing juniper removal. Planning should include careful post-removal management to prevent invasion by weeds and to establish a native sagebrush community that will support sage-grouse.	GB	Both	emc0355GB
197.	The one-size fits all approaches discussed on page 26 of the report are not appropriate. Fuels treatments (at least in our area) largely consist of linear green strips designed to eliminate heavy fuels in narrow corridors. This reduces fire severity when it bums into the fuel strip and increases the probability for a successful direct attack. It is difficult and probably costly to implement treatments that only reduce sagebrush cover to about 15%. Also, the lifespan of such treatments often will be short. Initial treatment will be costly and largely ineffective.	GB	Both	rmc0076gb
198.	In many areas, winter habitat is some of the most widespread and contiguous habitat. Much of it is one large fire away from the functional loss of all sagebrush. Fuel treatments composed of linear strips that remove the shrubs and promote	GB	Both	rmc0076GB

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	perennial bunchgrasses are the only realistic approach to breaking up these large continuous landscapes. We have concerns that this type of management imposed disturbance may be prohibited because of the limit of3% discrete disturbance in sage grouse priority habitat. Management actions should focus on the overall management goals, threats and risks, and the actions needed to achieve those goals and reduce threats and risks. Stringent numeric triggers that guide whether an action is or is not implemented should be avoided.			
199.	Controlled fire burns in habitat areas where graze - Are these being done?	IDMT	Both	cfc0009GB
200.	In Lemhi County we don't have the burn out situation as southern Idaho and don't have the private land loss of habitat from fire and such. My comment on this is don't make one size fit all-don't put Lemhi County in/under same law/control as areas that have had the greater losses. Don't punish us for issues that have happened somewhere else.	IDMT	Both	emc0045GB
201.	Categories for planning issues: Fire/Fuels management. Having lived through the last thirty (30) years of Forest Service management that has resulted in the loss of what were a robust timber industry, a pine beetle epidemic, and forests choked with overgrowth and brush we are now facing a catastrophic fire season. The Forest Service in Montana has done little to reduce fuel loading but has put in place impediments to the personal use firewood collector. The only group trying to remove fuels from the forest has been ham strung in their efforts. The only forested acres in the East Pioneer Mountains that are green are those which were clear cut 25-30 years ago. Clear cuts don't burn and are more resistant to pine beetle infestation	IDMT	Both	emc0133GB
202.	In addition to these goals, the Group has identified key threats to sage grouse in the Jarbidge Planning Area that they believe deserve special attention and consideration. These key threats include fire and invasive species, with fire having recently damaged a significant portion of the sage-grouse habitat in the Jarbidge Planning Area.	IDMT	Both	emc0158GB
203.	It appears that the agency has overlooked many of the benefits that the continuance of livestock grazing provides. These include: Preservation of open space; Noxious weed and invasive species eradication and containment; Production of forb growth that is preferred by greater sage-grouse to non-grazed areas; Wildfire prevention and controlled burn efforts; Development of wildlife watering sources, including placement of bird ladders in troughs; and Predator control. Rather than undertaking an attitude of restricting livestock, the agencies should utilize grazing as a tool to manage for the U.S. Fish & Wildlife Service's list of primary threats affecting sage grouse in Idaho including fires and invasive weeds.	IDMT	Both	flh0000GB
204.	The Dillion Local Working Group identified 5 key issues in the area: 2. the adverse affects of wildfire or prescribed fire	IDMT	Both	rmc0028GB
205.	Actions that reduce or minimize sage brush habitat include: -Eliminating sagebrush (including burning, plowing, mowing, or use of herbicides) as part of efforts to promote grass growth, or reduce fuels. -Wildfire	IDMT	Both	rmc0028GB
206.	Although fire disturbance can have positive effects on some prairie species, it should be noted that big sage brush is incredibly slow to recover from fire, which means a wildfire can eliminate sage grouse habitat and forage for decades. Ranchers and ranching communities provide a look-out and first-response system that absentee owners do not. The BLM and the counties have historically done a very good job of partnering with the local ranches to keep summer wildfires controlled. Furthermore, grazing is effective at fire prevention.	MT-RM	Both	emc0013RM

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207.	There is no evidence that cattle have any impact on sagegrouse, either positive or negative. However, there is plenty of evidence that ranching has a strong positive impact on sagegrouse. Ranches need to be relatively large and usually in native vegetation. This protects against habitat fragmentation and the destruction of sagebrush for fields or lawns. Ranchers need vegetation and will control fires to some extent. Hot, late, uncontrolled fires will destroy large areas of big sagebrush, which takes over a century to recover from a burn of this kind. Ranches tend to have some degree of predator control, and predators are the largest negative impact on sagegrouse, following sagebrush destruction. Areas with healthy sagegrouse populations tend to have ranches, areas that have lost their ranches have also lost their sagegrouse. It is easy and popular to protect sagegrouse from cattle, but the cattle don't harm the sagegrouse. If you remove the cattle, you also remove the ranches, which are important to the sagegrouse. Sagegrouse can be protected into extinction just like rare orchids and desert pupfish.	MT-RM	Both	emc0023RM
208.	We belive the biggest threat to sage-grouse in the Virginia Range was due to a devasting fire in the Virginia range about 12 years age. As a result of this fire almost all sage brush was burned and to date very little sagebrush has come back.	MT-RM	Both	emc0232GB
209.	In recent years the amount and size oftires is Southern Idaho and Northern Nevada has been higher than we can ever remember. We feel this is the biggest threat to the Sage Grouse because of loss of prime and necessary habitat, and the loss of prime food source for the birds.	NVCA	Both	emc0145GB
210.	Wildfire Suppression and Rehabilitation: We are concerned with the significant amount of sage-grouse habitat that has been lost from wildland fires. Our concerns are that restoration has not been very successful and has not occurred in a manner that benefits wildlife. NBU acknowledges that site stabilization is essential following to a wildland fire event; however, land management agencies may be able to restore habitat in a manner that will be more beneficial to wildlife than those tactics currently being used. NBU favors restoration efforts that rehabilitate habitat in a manner that promotes wildlife use during its initial stages and throughout its successional stages. We also think that fire management plans need to rank wildlife habitat, including sage-grouse, as a more critical resource. We understand that fire suppression is very dynamic requiring multiple variables to be considered for each individual incident; however, policies need to be in place that allow interagency fire suppression efforts, especially initial attack, to be more effective.	NVCA	Both	emc0180GB
211.	wildfire suppression, fuels management, and fire rehabilitation: There is a lot of disagreement between federal agencies and state wildlife agencies on any proposals to burn sagebrush or otherwise poison or mechanically destroy sagebrush for fuel breaks. Burning or otherwise destroying sagebrush results in direct habitat losses to Sage Grouse, both priority and general and risks of uncontrolled prescribed fires burning outside the project areas. In addition, there is insufficient scientific verification that the benefits of burning sagebrush to Sage Grouse or priority habitats outweigh the costs of increasing destruction, degradation, and fragmentation of intact sagebrush habitats or risks of uncontrolled prescribed fires. Fire rehabilitation also is also problematical, as fires can and do lead to expansions of invasive weeds and other vegetation undesirable to meet habitat requirements for Sage Grouse and other wildlife and rehabilitation often fails. Conservation measures are needed to address the threats of the fire management program to Sage Grouse and its habitats. a. the agencies should prioritize Sage Grouse priority habitats for wildfire prevention and suppression. b. the agencies should determine that proposed fuels suppression/management projects have greater benefits than costs to Sage Grouse. c. the agencies should design fuels projects to protect existing sagebrush ecosystems, including meeting specified objectives for	NVCA	Both	emc0283GB

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	sagebrush cover in priority habits. d. the agencies should apply apply seasonal restrictions for fuels projects. e. the agencies should not allow fuels projects in winter range or in <12 inch precipitation zones or in any areas with high potentials for weed invasions. f. the agencies should monitor and control invasive weeds, following fires and fuels projects. g. the agencies should require rest from grazing until restoration objectives are met. h. the agencies should require the use of native seeds and prioritize their use in rehabilitation of damaged priority habitats. i. the agencies should modify grazing management to sustain long term persistence of native plants. j. the agencies should evaluate any proposed use of livestock to reduce weeds, such as cheat grass, against grazing damage to native perennials. k. the agencies should consider the effects of droughts and climate change on potential restoration of burned areas.			
212.	CRI operates the Rochester Mine which is located 23 miles northeast of Lovelock on the southern end of the Humboldt Mountain Range in Pershing County, Nevada. Sage grouse summer, winter, and breeding habitat has been identified by past Nevada Division of Wildlife (NDOW) maps in Rochester mine's project area. NDOW has not, however, indentified any active leks or viable sage grouse populations around the project area. According to NDOW's Nevada Sage Grouse Conservation Project Report (December 2011 Final Performance Report): "The Pershing County portion of this planning unit has suffered tremendous losses of sagebrush habitats due to wildfire over the last decade with some mountain ranges burning almost completely (e.g. Eugene Mountains). The most viable population within the county is the Sonoma PMU. Twenty-four leks were surveyed in this PMU in 2011 with only 6 being active. A peak total of 52 males were observed resulting in an average of 8.7 males per active lek. This is a 7% decline from the previous year where the average attendance was 9.4 males. The long-term viability of PMUs such as the Eugene, Majuba, East Range, and Humboldt PM Us is considered very low, with some of these populations potentially extirpated already.'	NVCA	Both	emc0302GB
213.	It is especially important for BLM and USFS to prepare new maps using current data for Nevada because the Landsat imagery from 2001 - 2005 provide a snapshot of the state that does not represent current conditions due to the wildfires that swept through northern Nevada in the early 2000s. These fires destroyed a portion of the sage brush ecosystem in northern Nevada that is an important component of sage-grouse habitat. It is widely recognized that damage due to these fires is a principal reason for sage-grouse habitat reduction in Nevada.	NVCA	Both	emc0327GB
214.	It is inappropriate to base important policy decisions on maps that show sage brush communities and sage-grouse habitat that no longer exist due to wildfires. The NEP A analysis in Nevada must not be based on anachronistic data that do not provide accurate infonnation on the current location and extent of sage-grouse habitat.	NVCA	Both	emc0327GB
215.	Although it is truly unfortunate that there were wildfires that burned sage brush and destroyed sage-grouse habitat in northern Nevada, that is the reality in Nevada. The NEPA analysis must use a habitat distribution map that reflects these baseline conditions - not a map that inaccurately shows more habitat than currently exits - and will not provide a basis for meaningful analysis or the agency to rigorously explore and objectively evaluate all reasonable alternatives as NEP A requires. Indeed, alternatives and impacts cannot be reasonably or reliably evaluated if the data relied upon is stale and/or inaccurate.	NVCA	Both	emc0327GB

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216.	Furthermore, the Association would like to address the threat of wildfire to greater sage-grouse habitat. As one of the top five threats to the greater sage-grouse, improvements to wildfire pre-suppression methods to preserve the sagebrush communities in which greater sage-grouse reside and restoration strategies to replace deteriorated rangelands due to wildfire should be further researched. One such presuppression method the Association would like to suggest is the use of livestock grazing to produce fire breaks and maintain undesirable upland species. Research directly indicates that livestock grazing reduces the instances and severity of fires. The Association strongly believes that management for the conservation of greater sage-grouse and other sagebrush dependant species must focus on the health and resilience of the sagebrush ecosystem and should assess all available strategies to achieve healthy sagebrush ecosystems.	NVCA	Both	emc0328GB
217.	Design and implement fuels treatments with an emphasis on protecting existing sagebrush ecosystems. - Do not reduce sagebrush canopy cover to less than 15% (Connelly et al. 2000, Hagen et al. 2007) unless a fuels management objective requires additional reduction in sagebrush cover to meet strategic protection of priority sage-grouse habitat and conserve habitat quality for the species. Closely evaluate the benefits of the fuel break against the additional loss of sagebrush cover in the EA process. - Allow no treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around or in the winter range and will maintain winter range habitat quality. (Found under Fire Operations) In priority sage-grouse habitat areas, prioritize suppression, immediately after life and property, to conserve the habitat. - In general sage-grouse habitat, prioritize suppression where wildfires threaten priority sage-grouse habitat. - Follow Best Management Practices (WO IM 2011-138, see appendix E.) The Association strongly supports pre-suppression method of fuels management and striving to support a healthy sagebrush ecosystem to maintain a viable greater sage-grouse population. The above referenced measures do not allow for flexible fuels management techniques that would better support pre-suppression methods nor does the Association feel that the above referenced measures support striving to support a healthy sagebrush ecosystem.	NVCA	Both	emc0328GB
218.	We have experienced firsthand the wildfires that have raged through northern NV in the last decade. As a result we have lost AUM's for years at a time. We have also fenced areas of burned range in order for it to rehabilitate. Some of the areas that burned quite frankly needed burning as they were overgrown with old decadent sage that was taller than a person horseback and choked the feed that could be growing beneath it. In some burn areas the feed came back more lush and thick than ever...some of those areas were seeded, others were not. In other areas you saw an immense invasion of noxious weeds...some of those areas were seeded, others were not. Obviously sage-grouse habitat also burned in these huge fires. Hundreds of sagegrouse had to have died as well.	NVCA	Both	emc0390GB
219.	It is hard to understand claims made in the report that appear aimed at minimizing the impacts of the 1999-2007 fires. Even though significant portions of Elko County burned … this planning unit continues to harbor some of the largest and most contiguous sage-grouse populations in Nevada. This describes NDOW mainly focusing on trend leks, while BLM directs efforts towards checking leks associated with burned areas or that have little historic data. There appear to be omissions of sampling important sites like the Islands area. Are there no Trend leks in small PMUs? If not, why not? Some should be established. All does not appear to be well in other areas suffering significant losses in the 1999-2007 fires. Example: Gollaher:124 known leks, with 33 leks surveyed. Yet just 6 were active. This includes portions of the extremely degraded Salmon River allotment, Goose Creek, and other areas – and these lands have suffered significant losses during many	NVCA	Both	emc0411GB

Table C-13
Comments Related to Fire Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	wildfires. Of the 124 known leks – how many are urrently active? Where are active leks in relation to fires? Where are inactive leks? This is the kind of information that is essential for understanding the impacts of fires, or other habitat changes or developments. What has happened to trend leks in or near areas that have burned? What is the habitat like surrounding leks that continue to have birds, vs. leks that do not. In O'Neil, 43 leks were surveyed, yet only 15 were active. This area too has suffered large-scale fire. And of course – in the contiguous Islands PMU, no leks were surveyed. Why is no mapping or other information provided to portray what is occurring, and show the leks that were sampled and active vs. inactive?			
220.	As previously described, it is from our observations of BLM's claimed "fuelbreaks" and vegetation treatments conducted across Nevada (Austin Fuelbreaks, Elko Owyhee Fuelbreaks, Ely Fuelbreak weedlands of Cherry Creek and Spring Valley treatments, etc.) that removal of shrub protective cover, or tree protective cover, results in hotter, drier sites that become dominated by cheatgrass several years following "treatment". There is typically a 4-6 year lag period in sites that previously had little cheatgrass before being altered, which is longer than agencies typically monitor their "treatments". So the cheatgrass is showing up after BLM quits monitoring.	NVCA	Both	emc0411GB
221.	Wildfire is listed as the 3rd largest threat, and we agree it is a big problem, worsened by invasive species that come in after the fire. Large fires, over 1,000 acres in size eliminate most beneficial sage brush species that Sage Grouse depend on.	NVCA	Both	rmc0064GB
222.	An issue not mentioned in Assemblyman Hansen's article which is also of great importance is fire management. The degradation of sage brush communities by frequent fires due to the intrusion of cheat grass has greatly impacted sage-grouse populations. Livestock grazing can be used as a tool to reduce cheat grass and fuel loads as shown by recent studies conducted by the University of Nevada Reno (Reducing fuel load of key cheatgrass dominated range sites by the use off cattle grazing by Lee Schmelzer). Other fire management practices such as planting of Forage Kochia and fire road maintenance are critically important for the suppression of fire.	NVCA	Both	rmc0065GB
223.	Habitat loss in the Beaty Butte unit is due to past BlM prescribe burning that got out of control. However, those losses are localized although severe due to the size of the burns. Overall, through personal observations, sage populations are improving but are suppressed by an ever increasing avian population of raptors, ravens and crows, and coyotes, cougars, bobcats, and badgers.	OR	Both	emc0139GB
224.	Employ Best Practices for Fire Management and Seeded Treatments: BLM should use the most recent science to create effective planning around fire management and seeded treatments that will help maintain long-term sagebrush plant communities and sage-grouse habitat.	OR	Both	emc0385GB
225.	My personal observations of "Treated" juniper Encroachment areas on private lands throughout the Lakeview District show that in modest density stands it creates a high potential for Fire adjacent to public lands; it effectively decreases the sightlines increasing the likelihood of Sage Grouse predation; decreases private land productivity and impedes movement; and generally creates a visual eyesore. Before adoption of the EIS management plan, all agencies involved in Fire Fighting must conduct an inventory of all treated lands and determine the Fire Risk factors and potential limitations posed to firefighter access and safety; fuel loading and potentials for catastrophic fire conditions, and dangers to public land and Private Property.	OR	Both	rmc0036GB

Table C-13
Comments Related to Fire Management

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
226.	Blue Mt. has fallen victim to the thought that fire isn't a good thing (the aggressive Smokey Bear era) and could benefit from the use of controlled or prescribed burns since there is way too much large sage brush and too thick of populations of sage for sage grouse to flourish. The absence of fire has also allowed pinion and juniper to encroach into the sage brush, this encroachment needs to be addressed and also other methods of sage brush control need to be investigated.	UT	Both	emc0296GB
227.	The position that the threat of possible Sage Grouse listing has placed our citizens, western land states and their local government entities in, we view as a direct result of years of federal regulatory onus. Carbon Comity shall take a willing role in working to remedy this issue but believe that until the federal agencies and our national leadership recognizes that; reducing grazing AUM's west wide consistently for over 50 years, listing under ESA the natural predators of the grouse species, outlawing the use of poisons used to prevent predation and the promotion of fuel/biomass buildup by interrupting natural fire regimes have hosted the consequences we and the bird now endure.	UT	Both	rmc0026RM
228.	'Avoid the use of prescribed fire in areas of Wyoming big sagebrush and or within areas of less than 12 inches of annual precipitation.'(page 12 letter) Treatment for cheatgrass or downy brome is important and burns are tool that is used. More specificity is needed here-treatments will continue with burns for cheatgrass if the canopy of sagebrush is not reduced a certain %. There are many areas where downy brome can be burned without harming the sage brush and will bring in better forage post treatment. The rainfall limitation will prevent many areas of the state from prescribed burns because of the lack of water. Place this limitation on a case by case basis as there are several areas with invasive weeds or grasses that would benefit from a good burn but the rainfall limitation of 12 inches makes this a no go.	WY	Both	emc0050RM
229.	There should be no prescribed burning of forage within sage grouse core areas unless it is for ditch cleaning or similar maintenance. When prescribed burns occur within core areas that presents a disturbance that counts towards the total 5% surface disruption. The managing federal agency can then come back and cut the AUMs in that area because there has been too much surface disturbance—due to the burn. A planned burn by any federal agency should occur outside of the core areas for this reason. Lease holders should not be punished by a drop in AUMs because the federal agency decided to do a burn within a core sage grouse area.	WY	Both	emc0050RM
230.	iii. Strong components of Wyoming's approach Wildfire, a major form of disturbance that often is followed by the invasion of non-native species, is being addressed through active fire suppression in core areas. Operators are required to control noxious and invasive weed species, including cheatgrass.	WY	Both	emc0089RM
231.	8) Consider sage grouse habitat needs in the management of wild land and prescribed fire which recognizes the limited extent of important habitats in these mountain valleys. Scale and location are important considerations. Suppression of wildfires in important sage-grouse habitat (nesting, early brood rearing, and winter habitat) should be a priority.	WY	USFS	emc0144RM
232.	Stop the burns for prairie dog habitat in core sage grouse areas so that it is never included in any percentage of disturbance.	WY	Both	emc0176RM

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233.	In Wyoming, Wyoming big sagebrush dominates the vast majority of sage grouse habitat throughout the state, both in the Wyoming Basins Ecoregion and on the Great Plains. Natural fire return intervals in Wyoming big sagebrush average 100-240 years (Baker 2007). Wyoming big sagebrush recovers slowly after fires, which typically result in 100% sagebrush mortality; recovery to pre-fire canopy cover takes over 100 years (Cooper et al. 2007). Baker (2007) examined the same issue and projected that Wyoming big sagebrush recovery following fire ranges from 50 – 120 years; for mountain big sagebrush, the recovery period was estimated at 35 – 100 years. Prescribed fire can result in a loss of sagebrush dominance for 25-45 years, and may also result in increased erosion (Sedgwick 2004). Cooper et al. (2007) projected the full recovery of Wyoming big sagebrush canopy cover would take 625 years based on their observed recovery rates following prescribed fire (a biologically improbable outcome), and no recovery at all was recorded following prescribed fire on 17 of 24 sites. Close proximity to seed sources and moister conditions did not accelerate recovery in this study. These researchers concluded, "Wyoming big sagebrush recovery takes so long that managers considering prescriptive burns need to have a long-term view of the landscape before eliminating a sagebrush habitat that will not return for at least a century" (Cooper et al. 2007:12).	WY	Both	emc0343GB

Table C-14.A
Comments Related to Water Resources

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	I would like to see documentation and numbers on sage grouse dying from crashing into fences. They may be stupid, but they aren't that dumb. I have travelled thousands of miles down fence lines and have never seen a dead grouse by a fence, and neither has any of the dozens of permittees I've talked to.	All	Both	cfc0018RM
2.	Hunting sagegrouse doesn't make a lot of sense anymore. If it is continued- all license $ collected should go towards projects providing water for the grouse, which is a limiting factor given short shrify.	All	Both	cfc0018RM
3.	3% disturbance is a lot, especially considering the past 14 years. 10% would be more realistic. No more than 1 disturbance per section is not realistic either due to changing landscapes. There should be mitigation allowances made. Erusting used roads and large/medium reservoirs should not be counted.	All	Both	cfc0025RM
4.	West Nile virus, which is linked to standing water associated with some forms of energy development and agricultural water use, also poses a threat to greater sage-grouse in the Eastern Region. Naugle et al. (2004) showed that up to 25% of a population may die due to West Nile virus. The BLM produced an Information Bulletin (MT-2011-033) regarding best management practices to reduce the availability of breeding grounds for mosquitoes that carry West Nile virus. We recommend that these best management practices be implemented across BLM lands and particularly in sage-grouse core areas to prevent the death of this species. WWF has also produced, along with partners at the University of Wyoming, a spatially explicit map showing where West Nile virus is most likely to become prevalent under climate change conditions (Schrag et al. 2011). Areas with a high threat of West Nile virus (areas coded in yellow, orange and red in the figure below) that are located within core areas should be prioritized for reduction of standing water and other factors that increase the likelihood of becoming Culex mosquito breeding grounds. *Included an attachment (Figure 4)	All	Both	emc0034RM
5.	West Nile virus, which is linked to standing water associated with some forms of energy development and agricultural water use, also poses a threat to greater sage-grouse in the Eastern Region. Naugle et al. (2004) showed that up to 25% of a population may die due to West Nile virus. The BLM produced an Information Bulletin (MT-2011-033) regarding best management practices to reduce the availability of breeding grounds for mosquitoes that carry West Nile virus. We recommend that these best management practices be implemented across BLM lands and particularly in sage-grouse core areas to prevent the death of this species. WWF has also produced, along with partners at the University of Wyoming, a spatially explicit map showing where West Nile virus is most likely to become prevalent under climate change conditions (Schrag et al. 2011). Areas with a high threat of West Nile virus (areas coded in yellow, orange and red in the figure below) that are located within core areas should be prioritized for reduction of standing water and other factors that increase the likelihood of becoming Culex mosquito breeding grounds. *Included an attachment (Figure 4)	All	Both	emc0034RM
6.	Public lands are for public use, and that means public lands must be managed for multiple use. I am definitely in favor of conservation measures for sage-grouse such as managing for sagebrush, water developments to improve habitat, proper planned grazing, etc. However, we must be careful to not manage the public lands for one species or one purpose. For example, to eliminate livestock grazing in favor of sage-grouse conservation would not only be a bad biological decision (i.e. poor plant health, increased fire risk, etc); it would also go against the basic theory of multiple use.	All	Both	emc0043RM

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7.	As a long time (40+ years) hunter/fisher/experienced outdoor observer in Colorado, the basic answer to the sage grouse population is simple: Predators, cycles and water supplies. But mainly Predators.	All	Both	emc0052RM
8.	Water can be a critical factor in determining the abundance and distribution of wildlife, especially in arid western ecosystems; although the impacts vary by species, habitat, and season. Over the past 150 years, the availability and distribution of water have been drastically altered by both natural processes and human actions. By some estimates, 95 percent of natural riparian ecosystems (those associated with water features) and wetlands in the arid West already have been degraded or lost. We believe the loss of natural water resources threatens Greater Sage-Grouse population viability, but we realize domestic livestock also require water to survive. Federal public-land managers and ranchers have improved existing water supplies and developed new water systems for livestock and wildlife. Hundreds-of-thousands of these water developments are scattered across the western U.S. Water developments increasingly replace or augment diminishing natural sources in many areas and have become crucial for many species, especially Greater SageGrouse when stressed by drought, high temperatures or rearing young. These water sources and associated moist-soil (riparian) habitats are critical for Greater Sage-Grouse survival and reproduction. Springs, wetlands, seeps, wet meadows, bogs, fens, ephemeral and permanent streams, rivers, ponds, stock tanks and lakes all serve as or are surrounded by crucial habitats for Greater Sage-Grouse and other wildlife in the arid West. We believe that all water sources and associated moist-soil habitats on federal public lands should be protected from the effects of livestock disturbance and grazing. In most cases, livestock drinking water can be transported away from water sources and riparian habitats to sites that are not in limited supply and that are more compatible with livestock disturbance and grazing.	All	Both	emc0074GB
9.	Recommendation #3 - We recommend that the BLM and USFS require all administrative units to protect all water sources and associated moist-soil (riparian) habitats from the effects of domestic livestock disturbances and grazing on federal public lands under their prevue.	All	Both	emc0074GB
10.	We are also concerned that this process must not be viewed as establishing a high-water mark and fulfilling all conservation duties. There are still serious unaddressed issues with federal management of watersheds and aquatic ecosystems.	All	Both	emc0078GB
11.	As another example of how the numerous land-use prohibitions set forth in Report are overreaching and fail to define a reasonable balance of multiple uses, the Report (p. 16) suggests that new water development for diversion from spring or seep sources be authorized only when priority sage-grouse habitat would benefit from the development. It is inappropriate to suggest that water rights may be exercised on the public lands only where such uses provide a net benefit to sage grouse.	All	Both	emc0084GB, emc0026rm
12.	Work through county or watershed area organizations.	All	Both	emc0137GB
13.	Developing water sources in the more arid areas to reduce predation is critical. Predators congregate around water sources. Having more choices to water keeps predators guessing and reduces predation.	All	Both	emc0139GB
14.	Developed water sources should be recognized for the benefit they provide to the greater sage-grouse (bird ladders are required for all public land water troughs). Further, according to NEPA, existing water developments are exempt from NEPA review. Thus, maintenance of water developments should not be hindered by greater sage-grouse management activities.	All	Both	emc0140RM, emc0382GB, emc0075RM
15.	In many instances the BLM has huge expanses of land booming with excellent wildlife habitat. Unfortunately, there is little or no water. The BLM should develop watering sources every 2-3 square miles	All	Both	emc0165GB

Table C-14.A
Comments Related to Water Resources

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
16.	The BLM should focus efforts on developing watering sources for wildlife.	All	Both	emc0165GB
17.	According to the Reno Gazette Journal, the Southern Nevada Water Authority yesterday asked for 46,000 thousand more acre-feet of water to be transferred to Las Vegas, an 80% increase. The Ruby Pipeline natural gas line through northern Nevada purchased scores of water rights and uses water to purge its pipes. Gold mines and copper mines use tremendous amounts of water per minute. Individual Environmental Impact Statements do not take into consideration the cumulative impacts of all of these projects together, the current drought situation, and their effect on water through the next years. Water affects all plant and wildlife species.	All	Both	emc0170GB
18.	Water developments do not rate very high on the "threats to sage grouse" graph but availability of surface water and distribution of water sources and moist sites is likely very important to grouse in this area relative to the large expanses of xeric habitat	All	Both	emc0173GB
19.	Evidence is mostly anecdotal but my observations suggest that surface water is a huge attractant to sage grouse during summer and fall. During this period livestock tank overflows in grouse areas are almost always discovered and used heavily by sage grouse as are temporary pools on desert roads. These tank overflows also produce isolated areas of moist soil habitats which appear to be heavily used by grouse, especially when not used by livestock.	All	Both	emc0173GB
20.	Water: Ranching in this area offers significant opportunities for water enhancements for sage grouse. Much of the key grouse habitat is on BLM and private land and buried pipelines are common. Currently water is pumped to tanks to meet livestock needs and not grouse needs. There would be an opportunity to pump water to meet grouse needs especially after cattle are moved off BLM and up to higher pastures. In some instances dedicated storage tanks could be installed to provide water if pipelines must be shut off for the season. In certain instances longer term water flows could provide moist soil sites in key brood use areas.	All	Both	emc0173GB
21.	Habitat Loss is much more difficult. Sage grouse populations have existed side by side with commercial grazing for 150 years. What sage grouse populations have never before had to deal with is large population of uncontrolled horses. It seems more than coincidental that wide spread problems with declining grouse populations coincide closely with implementation of protection of "wild" horses ranging almost uncontrolled over large swaths of the American west. The horse populations have had sever adverse effects on not only sage grouse, but also on deer, elk and rabbit populations where the horses, in addition to uncontrolled year long overgrazing of critical habitat tend to trample many spring areas, destroying the open spaces necessary for water flow and effectively closing the spring, permanently destroying water sources for sage grouse as well as other game species.	All	Both	emc0200GB
22.	On February 6, 2012 Judge Windmill indicated that actions such as fencing spring to prevent trampling by cattle were unacceptable , since they "ensure(s) that this potential critical habitat cannot be used by the sage grouse." The springs, that I have seen fenced off, were done with barbed wire and the sage grouse could go under or over the wire to get into the enclosure. Some of the very small ones 10 feet by10 feet are done just around the spring were done with woven wire or chicken wire still have hole that a sage grouse could get in. The excess water that does not get piped to the tanks and ponds comes out under the enclosures fence and produces green grass and mud for the insects to live in. I have never seen where a sage grouse has flown into a fence and gotten caught there.	All	Both	emc0207GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
23.	Water development (springs and guzzlers) and protection of critical riparian areas should be a high priority effort especially in Sage Grouse areas.	All	Both	emc0217GB
24.	We all know that where livestock are grazed, the owners help to develop water sources. No specie can live without water. By maintaining a healthy and active water source, sage grouse along with other game bird species have a viable habitat.	All	Both	emc0237GB
25.	Limiting ranchers' ability to develop water sources for fear of increasing mosquitos that might carry West Nile is counteractive to increasing sage grouse numbers. Lifting restrictions and allowing ranchers to develop water sources, fence and protect meadows, and allowing regulated shooting of the raven would help boost sage grouse numbers.	All	Both	emc0244GB
26.	Limiting ranchers' ability to develop water sources for fear of increasing mosquitos that might carry West Nile is counteractive to increasing sage grouse numbers. Lifting restrictions and allowing ranchers to develop water sources, fence and protect meadows, and allowing regulated shooting of the raven would help boost sage grouse numbers.	All	Both	emc0244GB
27.	Limiting ranchers' ability to develop water sources for fear of increasing mosquitos that might carry West Nile is counteractive to increasing sage grouse numbers. Lifting restrictions and allowing ranchers to develop water sources, fence and protect meadows, and allowing regulated shooting of the raven would help boost sage grouse numbers.	All	Both	emc0244GB
28.	Water developments are another problem. Upland springs are frequently developed into sources of water for cattle, to try to keep them away from streams. But this involves building a water trough that then is surrounded by a barren area, ripe for invasion by noxious weeds and cheatgrass. At the same time, the spring itself is fenced off to keep cattle out. Sage-grouse hens thus have to run a gauntlet of a wide-open area plus a fence on which raptors might perch in order to lead their chicks to an area with accessible water, forbs, and insects. If the spring had not been developed and the livestock was not there, these problems would not exist.	All	Both	emc0268GB
29.	Water quality and quantity may also be negatively affected by energy development. Water is often depleted from natural sources for activities associated with the development, including drilling or suppression of dust pollution. Cumulative effects to water quality and quantity may also result from oil and gas drilling activities. For example, by pushing wildlife and livestock out of the area, animals become concentrated at remaining water sources, thus leading to unnatural levels of competition for limited water resources. This unnatural concentration of species may also increase habitat degradation near remaining water sources, as livestock and wildlife trample vegetation and forage on shrubs in the area.	All	Both	emc0276GB
30.	Additionally, sagebrush lands used for grazing often are subject to unnatural habitat modifications, including prescribed fire and herbicide use. These alterations are generally used to eradicate sagebrush to create more grass for domestic livestock. Additionally, water provided for livestock can become incubators for West Nile virus, the biggest disease threat to sagegrouse. Water troughs may also cause direct mortality through drowning when escape ramps are not provided. Development of springs and other water sources to support livestock can also artificially concentrate domestic livestock and wild ungulates in important sage-grouse habitats, thereby exacerbating grazing impacts in those areas.	All	Both	emc0276GB
31.	West Nile virus seems to be currently the only disease of concern with regard to sage-grouse populations. When an outbreak of West Nile virus occurs in greater sage-grouse populations, it becomes a significant mortality factor due to the species' lack of resistance and the ongoing proliferation of water sources through the species' range. Currently, however, studies only reveal a patchy distribution of the disease and minimal impacts to sage-grouse populations. The prevalence of West Nile virus is likely to increase across the species' range. Climate change resulting in higher temperatures may also	All	Both	emc0276GB

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	exacerbate the frequency and occurrence of this disease. Notably, coal bed natural gas development may have a cumulative effect on sagegrouse as ponds created by the development may increase the risk of West Nile virus mortality in late summer.14			
32.	Successful livestock operations plan at least one year in advance, and the most successful plan for contingencies such as drought. Reducing stocking rate during the first year of a drought can be devastating to producers, and is often marginally beneficial to the land. However, with advance notice and consultation, operators can generally find alternatives allowing them to reduce stocking rate in subsequent years of a multi-year drought, and especially during the first 'Normal" rainfall year following a drought.	All	Both	emc0281GB
33.	The include the development of increased water resources and irrigated meadow.	All	Both	emc0301GB
34.	The EIS must specifically address water development on public lands. It is improper and short sighted to authorize and manage such activities for a single species or land use. Additionally, the EIS must address the role of the states in approving water development on public lands and how state and federal interests and authorities will be coordinated as they relate to water.	All	Both	emc0310GB
35.	The trend in water developments is to convey the water away from the spring area so that livestock will not congregate in the area of saturated soil, and also to return overflow to the spring drainage. These types of water developments are benefit to sage-grouse by maintaining the riparian vegetation, and avoiding the trampling effects of livestock on wet spring meadows. Therefore, such water developments should be encouraged, not restricted.	All	Both	emc0322GB
36.	Climate change is projected to impact sagebrush habitats, and also to potentially impact sage-grouse survival and reproductive success. Despite this fact, climate change is not listed as a preliminary issue in the Notice of Intent for the greater sage-grouse planning process. This oversight has to be effectively remedied at the Draft EIS stage, the agency must include a comprehensive analysis of the predicted climate change impacts to sage-grouse and any proposed management regime must take into account the cumulative effect of climate change and other impacts and provide protections sufficient to recover and conserve the sage-grouse despite these threats. Climate change impacts that must be analyzed include, but are not limited to: · Increased temperature and increased precipitation allowing expansion of woody vegetation from higher elevations. · Increased temperature and decreased precipitation shifting the balance toward more drought-tolerant desert plants. · Alteration in fire regime from a warmer climate, which would be problematic for fire intolerant sagebrush. · The spread of invasive annual grasses, such as cheatgrass, which have a very different growth form than the native bunch grasses and can lead to more severe fire. · Drought conditions, which have been shown to negatively impact nest success. · West Nile virus, which may worsen with warmer summertime temperatures that speed the development of the virus within the vector mosquitoes.	All	Both	emc0339GB
37.	Livestock water developments, such as ponds and guzzlers, may also benefit wildlife, including Sage Grouse, by providing water where none may naturally exist	All	Both	emc0342GB
38.	In its list of Problem Statements, WAFWA (2006) outlined a daunting list of threats to sage grouse persistence: -Human-caused impediments to natural water drainage can reduce the input of water, nutrients and sediments, which help to sustain and recruit sagebrush.	All	Both	emc0343GB

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39.	At minimum, the NEPA analysis should address the following: • Analyzing the degree of threat of West Nile virus and assessing the impact of BLMpermitted activities in increasing that threat.	All	Both	emc0343GB
40.	At minimum, the NEPA analysis should address the following: • Requiring underground injection of produced water to prevent the construction of reserve pits that serve as breeding grounds for Culex spp. mosquitoes that are carriers of West Nile virus.	All	Both	emc0343GB
41.	Water Availability: The CCC's development of water holes and reservoirs in the late 1930's was followed by continually increased construction of water holes and reservoirs throughout the arid desert areas from 1948 to the 1990's. Some of these afford water yearlong in areas where very little, if any, existed previously. This increase in availability of water throughout the year benefited many species, some greater than others.	All	Both	emc0388GB
42.	West Nile virus. Issue: West Nile virus, a disease that is usually fatal to sage-grouse, is spread by the Culex mosquito that will use anthropogenic water sources as habitat.	All	Both	emc0391GB
43.	West Nile virus. Issue: West Nile virus, a disease that is usually fatal to sage-grouse, is spread by the Culex mosquito that will use anthropogenic water sources as habitat.	All	Both	emc0391GB
44.	West Nile virus (WNv) is an exotic disease that was discovered in Greater Sage-grouse in 2003 (Naugle et al. 2004). Sage-grouse are highly susceptible to WNv infection (Walker et al. 2007). WNv is usually fatal to sage-grouse, resulting in death within six days of infection (Dierauf/USGS bulletin 2006). WNv has had a significant negative impact on local populations of sage-grouse (Walker et al. 2004; Naugle et al. 2004). The species' resistance to the disease is expected to increase slowly over time (Walker and Naugle 2011). WNv-related sage-grouse mortality rates vary widely and occur in areas with and without coalbed methane (CBM) development (Naugle et al. 2004). However, ponds created from CBM development were deemed responsible for a 75 percent increase in mosquito breeding habitat in the Powder River Basin and appear to facilitate the spread of WNv into otherwise semi-arid sage-grouse habitat (Zou et al. 2006).12 CBM wastewater reservoirs were found to "significantly increas[e] the overall population of [WNv] vector mosquitoes in the [Powder River Basin]" and "[coalbed natural gas] ponds and associated habitats enhance mosquito abundance and may serve to increase pathogen transmission in an otherwise arid ecosystem" (Doherty 2007: ix). WNv has been discovered in all 11 states and two Canadian provinces where sage-grouse still occur (Kilpatrick et al. 2007), and sage-grouse mortalities from the disease have been documented in 10 states and one province (Walker and Naugle 2011). Naugle et al. (2004: 711) stated that the "emergence of WNv further complicates the difficult task of conserving sagegrouse in western North America." Sage-grouse populations are becoming increasingly fragmented and the threat of WNv to small, isolated populations of sage-grouse is cause for concern (Naugle et al. 2004). Warming temperatures that result from climate change are expected to facilitate the spread of the Culex mosquito that carry WNv (Gould and Higgs 2009). Scientists recommend reducing the spread of WNv by avoiding development new anthropogenic water sources, and eliminating current sources, that support vector mosquitoes (Naugle et al. 2004; Walker et al. 2007; Walker and Naugle 2011).	All	Both	emc0391GB
45.	The BLM list of proposed Agency Plan amendments omits several key components of Land Use Plans and management activities conducted by federal agencies that must also be considered in this process. These include:Energy or other rights-of-way for Wind MET towers and any other energy devices or activities including oil and gas pipelines. Renewable energy and oil and gas development are not even listed. Communication towers, and other tall structures or developments	All	Both	emc0411GB

Table C-14.A
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	are omitted. Such intrusions can have a huge Footprint ncluding visual, access roads, etc. Water pipelines and rights-of-way are not listed. This includes irrigation diversions that remove water from streams, ditches, and aquifer mining proposals like the Southern Nevada Water Authority's massive proposed pipeline for removal/mining and export of ground water from desert aquifers. The SNWA aquifer mining pipeline, for example, has a host of ancillary disturbance facilities associated with it. Right now in Idaho and Nevada, immense communications towers are being proposed. In Idaho, a tower over 700 ft. tall would be placed in wintering habitat for a very small and declining population of sage-grouse also threatened by wind energy development.			
46.	This contains a list of BMPs on"how to make a pond." However, there is no accounting for how tens of thousands of improperly built livestock and other ponds currently exist, inevitable leaks and spills in pipe or other water systems, or the role of livestock trampling of riparian or pond margins in creating mosquito habitat. There is also no accounting for water troughs - and pipelines extending waters and thus mosquitoes into areas remote from water. There is no analysis of any kind of the adverse impacts of building ponds in plugging intermittent or ephemeral drainages - and the extensive livestock sacrifice zone that typically results. Prolonging water presence in ponds often prolongs and exacerbates intensive livestock degradation of large surrounding areas. Many thousands of ponds have been dug into portions of springs and wetlands in sage-grouse range as livestock "improvements." These improvements destroy the functionality of the spring, meadow, seep or drainage. They promote desiccation and desertification of the spring/meadow/riparian area, and loss of essential sage-grouse brood rearing habitat. There is no analysis of the impacts of livestock watering at ponds trampling and pocking shoreline depressions that serve as breeding spots for mosquitoes. Why isn't BLM requiring removal of ponds, and real restoration of functioning riparian systems and watersheds? Instead, just as with the greatly flawed Core and Priority schemes, BLM focuses on expanding habitat degradation and loss. Where is BLM guidance on How to Remove a Pond and Restore Watershed Processes? BLM must prohibit more ponds in sensitive areas altogether, and greatly reduce the existing number of energy, livestock, mining and other impoundments. BLM must also address the full Footprint and impacts of tens of thousands (if not more) of livestock troughs and associated water spillover areas in promoting West Nile virus acres uplands of the sagebrush biome.	All	Both	emc0411GB
47.	How does directional and horizontal drilling affect aquifers and the spring and riparian areas whose surface expression is linked to them? How will water tables be impacted? Will waters essential for wildlife or human uses be polluted? How does punching pond after pond into areas with shallow water tables or aquifers, as described in the previous Appendix disrupt hydrological systems?	All	BLM	emc0411GB
48.	Why is there no discussion about protecting flows of all springs, seeps and streams affected by energy and mining activity? For example, cyanide heap leach mining causes aquifer declines and aquifer drawdown of springs/streams. Water sources critical for wildlife may be severely altered by mining activity, and watershed by associated surface disturbance. These systems in arid western lands are typically already under significant stress from degradation by ubiquitously grazed livestock, and livestock water developments that remove water from spring sources to promote livestock use, as well as gouge stock ponds in springs or drainages. See Sada et al. BLM Technical Bulletin 2003. This alters and disrupt drainage networks, flow patterns, and extent of riparian and meadow habitats. There is serious risk of declines in water levels or cessation of flows altogether due to combined effects of mining, roading, grazing disturbances - all serving to desertify landscapes. Why are there no	All	Both	emc0411GB

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	protections for such threats, especially given the breakneck speed of mining development in already fragmented areas of Nevada and other western states?			
49.	need for land in production uses up the water in dry areas. These birds are use to the climate and are an asset	All	Both	fla0095gb
50.	I really think that if the BLM and the Forest Service would make a concentrated effort to suppress the big fires in the sagebrush and develop and repair water sources, particularly waterholes, that the sage grouse would come back to their former numbers better than if they were listed, which probably wouldn't help them at all.	All	Both	rmc0017GB
51.	Water Resources As alternatives are developed, we encourage the inclusion of measures which conserve, enhance and restore riparian areas and wetlands. Also, because of the aridity of greater sage-grouse habitat, we recommend that the EISs analyze potential impacts to ephemeral water bodies.	All	Both	rmc0020RM rmc0077gb
52.	It is advisable to avoid and eliminate man-made water sources that support breeding mosquitoes known to vector the West Nile Virus. This infectious disease is known to exist in the sage grouse ranges in Montana.	All	Both	rmc0024GB
53.	It is advisable to avoid and eliminate man-made water sources that support breeding mosquitoes known to vector the West Nile Virus. This infectious disease is known to exist in the sage grouse ranges in Montana.	All	Both	rmc0024GB
54.	The DEIS should discuss potential approaches for managing the new occurrence of West Nile virus, and land and water management strategies that may minimize disease prevalence and population impacts.	All	Both	rmc0028GB
55.	The DEIS should discuss potential approaches for managing the new occurrence of West Nile virus, and land and water management strategies that may minimize disease prevalence and population impacts.	All	Both	rmc0028GB
56.	These tough decisions must start with rejecting the Southern Nevada Water Authority's request to run a pipeline across 300 miles of BLM lands to mine the groundwater of the Great Basin, thereby facilitating the biological liquidation of a significant portion of the Sage Grouse's ecosystem. The BLM, if it were to approve this pipeline, would repudiate whatever pretense of intent to conserve the Sage Grouse may be presented in the conservation guidelines it is currently developing, and virtually ensure that it must relinquish the Sage Grouse to the Endangered Species Act. Ultimately, the BLM must face the cold and plain reality that certain "no" decisions must be issued to those interests and parties wishing to appropriate the resources upon which the Sage Grouse r elies, and it is out of time to make this policy correction.	All	Both	rmc0037rm, rmc0070GB
57.	After further research on an area identified on the Manti-LaSal National Forest above Fairview, we note that there is a FEIS being prepared for possible publishing in the Federal Register this year concerning the building of a dam and reservoir called the Narrows Project. The proposed dam and reservoir does have a mitigation plan for the Greater Sage-Grouse that should have bearing on the planning processes for the Manti-LaSal Forest LUP. We would strongly encourage a review of this FEIS regarding the Greater Sage-Grouse as addressed in anticipation of the completion of this project.	All	Both	rmc0043GB
58.	Additionally, Sanpete County is a predominately agriculture county. Our farmers and ranchers rely on the Forest as well as the BLM lands for grazing. It was hard to determine exactly from the maps who will be impacted by conservation measures included in the BLM and Sanpitch Mountain Range LUPs specific to our county, but we would hope that a cooperative management strategy would be proposed for those farmers and ranchers who use grazing permits in those areas.	All	Both	rmc0043GB
59.	BLM and FS should put in place a "net conservation benefit" requirement for the mitigation of impacts to resources and values. BLM should ensure that any loss of resources or values on a development site is compensated with the addition and	East	Both	emc0089RM

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	protection of equivalent or better resources and values offsite with appropriate assurances that conservation values will be maintained for at least as long as project impacts persist. BLM and FS should also make a determination about the value of the habitat to be impacted and adopt direction for mitigation requirements for the specific habitat types impacted. For example, for high quality habitat which is relatively scarce or becoming scarce on a national basis or in the ecoregion section 28, BLM policy should ensure a net gain of in-kind habitat value. Additions of lands and resources should exceed the value of any resources lost. Additions could be gained through restoration and research efforts to improve the quality and quantity of equivalent resources and values off-site. Mitigation for impacts to water resources could be addressed by purchase and retirement of water rights to offset groundwater pumping by the project.			
60.	The attention on the sage grouse and its allegedly dwindling populations coincided with the spread of West Nile Virus into Wyoming. It was first documented in 1999 and well-established by 2002. Invasion Biology Introduced Species Summary Project - West Nile ... http://www.columbia.edu/itc/cerc/danoff-burg/invasion_bio/inv_spp.... Most avian deaths are unreported because the remains are eaten by scavengers. It is, thus, impossible to determine the number of sage grouse affected by West Nile Virus. But given the virtual elimination of all song birds for the initial years when West Nile Virus infested urban areas and the number of human infections, it is reasonable to assume that West Nile Virus exacted a similar toll on sage grouse. Ex. 1 p. 3. Western Wyoming also suffered a severe drought during the same time frame which reduced insects necessary to feed the brood during the nest rearing phase. The combined impacts of disease and drought depressed bird numbers during the same time period and it is likely that other estimates, which attribute bird population declines to land uses err by omitting the cumulative effects of predation, disease and drought.	East	Both	emc0155rm
61.	The attention on the sage grouse and its allegedly dwindling populations coincided with the spread of West Nile Virus into Wyoming. It was first documented in 1999 and well-established by 2002. Invasion Biology Introduced Species Summary Project - West Nile ... http://www.columbia.edu/itc/cerc/danoff-burg/invasion_bio/inv_spp.... Most avian deaths are unreported because the remains are eaten by scavengers. It is, thus, impossible to determine the number of sage grouse affected by West Nile Virus. But given the virtual elimination of all song birds for the initial years when West Nile Virus infested urban areas and the number of human infections, it is reasonable to assume that West Nile Virus exacted a similar toll on sage grouse. Ex. 1 p. 3. Western Wyoming also suffered a severe drought during the same time frame which reduced insects necessary to feed the brood during the nest rearing phase. The combined impacts of disease and drought depressed bird numbers during the same time period and it is likely that other estimates, which attribute bird population declines to land uses err by omitting the cumulative effects of predation, disease and drought.	East	Both	emc0155RM
62.	Address Impacts of Water Developments: BLM should recognize the problems created by water developments and associated West Nile virus transmission, and should avoid new water developments and consider removal of water developments in priority habitat.	GB	Both	emc0355GB
63.	New water developments create intense habitat degradation due to the high density of livestock use they attract, and should be avoided in key sage-grouse habitat. West Nile virus (WNv) can have deleterious impacts on small and isolated populations of Greater Sage-grouse (Walker and Naugle 2011). Water developments should incorporate designs that	GB	Both	emc0355GB

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	reduce the growth of mosquitoes by reducing shallow stagnant water from accumulating and take steps to reduce sedimentation and vegetation growth. The focus should remain on controlling mosquito populations in close proximity to sage-grouse leks, and should not be interpreted as an endorsement of broad scale use of adulticides. Ultimately, no level of control will eliminate mosquitoes from the landscape, nor is such an outcome ecologically desirable (Clark et al. 2006, Doherty 2007, Walker and Naugle 2011). Impacts of WNv should be factored into sagegrouse population models, and continued research should be devoted to build a better understanding of how sage-grouse populations are impacted by WNv and other diseases. The NTT cites Doherty (2007) in Appendix C and outlines best management practices for limiting mosquito presence. Some of these management practices related to ponds include: ☐ Increasing size of ponds ☐ Creating steep shorelines ☐ Maintaining a muddy shoreline that is unfavorable habitat for mosquito larvae ☐ Avoid flooding terrestrial vegetation in flat terrain or low lying areas ☐ Eliminating seepage or overflow pipe, and lining the overflow spillway with crushed rock ungulates that trample and disturb shorelines (all cited from Appendix C) Summary: BLM should recognize the problems created by water developments and associated West Nile virus transmission, and should avoid new water developments and consider removal of water developments in priority habitat.			
64.	(identified as a priority issue in the Dillion Area) Adequate seasonal habitat -Drought and other factors can affect forb and insect production, both of which are important food sources for young sage grouse -water availability (especially during drought)	IDMT	Both	rmc0028GB
65.	DEQ Twin Falls Regional Office (TFRO) covers an area in South-Central Idaho that includes the counties of Twin Falls, Cassia, Minidoka, Lincoln, Jerome, Gooding, Camas, Blaine, and portions of Power, Owyhee, and Elmore. As described in BLM's "A Report on National Greater Sage-Grouse Conservation Measures" (December 21,2011), "management actions by BLM in concert with other state and federal agencies, and private land owners playa critical role in the future trends of sage-grouse populations." To this end, DEQ TFRO can provide technical assistance to BLM relative to water quality issues on those water bodies where sage grouse and their associated habitat may have residence.	IDMT	Both	rmc0031GB
66.	The Greater Sage-Grouse conservation efforts commonly include activities that may have an impact to water sources either directly or indirectly. DEQ TFRO respectfully requests that the BLM consider this when developing their draft document for the National Greater Sage-Grouse Planning Stiategy. Within the region there are multiple Total Maximum Daily Load (TMDL) plans developed to protect and enhance surface water within the applicable watershed(s). A link to the TMDL documents that the State ofIdaho has developed can be found here: http://www.deq.idaho.gov/water-quality/surface-water/tmdls.aspx . DEQ TFRO can provide BLM with technical assistance in this area where approved TMDLs may define the water bodies that are presently listed; as well as the support status of those water bodies.	IDMT	Both	rmc0031GB
67.	In addition, the Idaho DEQ develops a biennial report for the surface water sources in the state called the "Integrated Water Quality Monitoring and Assessment Report" (Integrated Report). DEQ is required by the federal Clean Water Act (CWA) to conduct a comprehensive analysis of Idaho's water bodies to determine whether they meet state water quality standards and support beneficial uses or if additional pollution controls are needed. A link to this report can be found here:	IDMT	Both	rmc0031GB

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	http://www.deq.idaho.gov/water-quality/surface-water/monitoring-assessmentlintegratedreport. Aspx. Idaho's most recent approved version is its 2010 Integrated Report. This document will guide DEQ's water quality management decisions until a 2012 Integrated Report is completed by DEQ and approved by U. S. Environmental Protection Agency (EPA). DEQ TFRO can provide BLM with technical assistance in this area where sage grouse may reside within the watershed of concern where best management practices are needed.			
68.	On the other hand, the oil and gas companies have a documented history of destroying/raping our lands with chemicals that are polluting our lands, waters and air. It is beyond the scope of this letter to detail all of the findings of the land abuse these companies have hurled on Americans in recent years, however, if you do require details, I'll be delighted to oblige you with a list/document.	NVCA	Both	emc0019GB
69.	The Nevada Wilderness Project respectfully requests that you address the impacts to sage-grouse and sage-grouse habitat caused by feral horses, including removal of vegetational cover necessary for nesting and brood--rearing, changes to vegetational composition that results from feral horse use, horse impacts to springs and other important free water sources utilized by sage-grouse, possible disturbance caused by feral horses during the nesting period, infrastructure used to mitigate horse impacts (e.g., fences) and how it may negatively affect sage-grouse, any connection to West Nile Virus as that disease is recognized as affecting both horses and sage-grouse, and the potential for feral horse management actions to negatively affect sage-grouse and sage-grouse habitat.	NVCA	Both	emc0243GB
70.	For example, the headwater springs, seeps, streams in northern Nevada and southern Idaho are already under great stress from historical and chronic ongoing livestock grazing disturbance. In areas suffering mining disturbance, aquifer drawdown processes are causing flow reductions, and springs are drying up altogether. The Core Model uses sage-grouse to essentially marginalize all non-sage-grouse habitat lands. Yet mining, energy or other development and/or continued livestock degradation of the nonsage- grouse or "lesser importance" lands would disrupt watershed processes, and lead to further declines in perennial surface flows – resulting in losses of essential sage-grouse brood rearing habitats. Use of this flawed approach is likely to endanger many other species.	NVCA	Both	emc0411GB
71.	Another serious threat to sage-grouse habitat in the Great Basin is posed by the proposed Southern Nevada Water Authority's groundwater development and pipeline project. The planned monitoring and mitigation plans are woefully inadequate to protect the bird and its habitat from long-term impacts due to this project.	NVCA	Both	fld0010rm, fld0010gb
72.	With regards to habitat changes, there were at least 6 small ranches which were later absorbed into Quinn River Ranch which had small irrigated meadows which would have historically provided habitat to Sage Grouse. These ranches included the Houghland Place, Harness Place, Virgin Creek, Bramlett Station, Mud Creek, and Wilder Ranch. All of these smaller irrigated meadows have not been irrigated in many years as they are no longer economically viable. While it's no longer practical to irrigate these small fields, it must be a factor in the decline of the sage-grouse population in our immediate area. There are many similar operations which have fallen into disuse in the Great Basin with a resultant impact on the sage-grouse population. While sage-grouse are rarely sighted on our irrigated fields at the headquarters, they were historically present there also. It's critically important that the remaining irrigated meadows in the Great Basin be maintained so as to provide wildlife habitat for many species, including sagegrouse.	NVCA	Both	rmc0065GB

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73.	With regards to water development, we have enhanced and increased water development on our range in recent years so as to provide more viable year round water supplies for both livestock and wildlife. This has included building new pipelines and water troughs, repairing existing ones that had fallen into disuse, as well as refurbishing existing springs and water troughs that were in disrepair. I believe all of these improvements will enhance wildlife and sage-grouse habitat over time. It should be noted that the new improvements, while beneficial to wildlife, were opposed by an environmental group opposed to Public Lands grazing. The continued maintenance of these year round water developments which are so important to wildlife will depend upon the economic viability of Quinn River Ranch.	NVCA	Both	rmc0065GB
74.	Address Impacts of Water Developments: BLM should recognize the problems created by water developments and associated West Nile virus transmission, and should avoid new water developments and consider removal of water developments in priority habitat.	OR	Both	emc0385GB
75.	Policy Statement 7: West Nile Virus: ' Artificial water impoundments will be managed to the extent of BLM's authority for the prevention and/or spread of West Nile Virus…This may include..(c) building steep shorelines to reduce shallow water and emergent aquatic vegetation; (d)maintaining the water level below rooted vegetation; (i) restricting access of ponds to livestock and wildlife (Doherty 2007).The BLM mentions several instances where they would regulate reservoir use by fencing out, making the banks too steep for livestock use, keep water level low: The reservoirs on federally managed lands are for the wildlife as well as livestock use. If the reservoirs are fenced out, banks made too steep or the reservoir is unfit for livestock to use; the water will also be unfit for wildlife use. Young elk, pronghorn and deer will not be able to get out of steeply sloped reservoirs any more than sheep or cattle. You are not allowing yourselves to look at the whole picture. Multiple use means wildlife and livestock. The use of larvicide is a good recommendation if used according to the label.	WY	BLM	emc0050RM
76.	The BLM could make it a point to distribute the B.t.i. Briquets within 3 miles of nesting and lek areas on standing large bodies of water. These are not poisonous to wildlife (if directions are followed) and should only be distributed on waters not for human consumption. An incorrect use of these might cause litigation of mismanagement due to animal illness. The Briquet will prevent the mosquito larvae from thriving and help decrease the chance of spreading West Nile.	WY	BLM	emc0050RM
77.	Policy Statement 7: West Nile Virus: ' Artificial water impoundments will be managed to the extent of BLM's authority for the prevention and/or spread of West Nile Virus…This may include..(c) building steep shorelines to reduce shallow water and emergent aquatic vegetation; (d)maintaining the water level below rooted vegetation; (i) restricting access of ponds to livestock and wildlife (Doherty 2007).The BLM mentions several instances where they would regulate reservoir use by fencing out, making the banks too steep for livestock use, keep water level low: The reservoirs on federally managed lands are for the wildlife as well as livestock use. If the reservoirs are fenced out, banks made too steep or the reservoir is unfit for livestock to use; the water will also be unfit for wildlife use. Young elk, pronghorn and deer will not be able to get out of steeply sloped reservoirs any more than sheep or cattle. You are not allowing yourselves to look at the whole picture. Multiple use means wildlife and livestock. The use of larvicide is a good recommendation if used according to the label.	WY	BLM	emc0050RM
78.	Policy Statement 7: West Nile Virus: ' Artificial water impoundments will be managed to the extent of BLM's authority for the prevention and/or spread of West Nile Virus...This may include..(c) building steep shorelines to reduce shallow water and emergent aquatic vegetation; (d)maintaining the water level below rooted vegetation; (i) restricting access of ponds to livestock and wildlife (Doherty 2007).The BLM mentions several instances where they would regulate reservoir use by	WY	BLM	emc0050RM

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	fencing out, making the banks too steep for livestock use, keep water level low: The reservoirs on federally managed lands are for the wildlife as well as livestock use. If the reservoirs are fenced out, banks made too steep or the reservoir is unfit for livestock to use; the water will also be unfit for wildlife use. Young elk, pronghorn and deer will not be able to get out of steeply sloped reservoirs any more than sheep or cattle. You are not allowing yourselves to look at the whole picture. Multiple use means wildlife and livestock. The use of larvicide is a good recommendation if used according to the label.			
79.	Fencing out is a bad idea because if an animal is thirsty enough they will crawl over and then either be caught in the fence or unable to get back out to graze. Eventually the fence will be down and be a hazard with loose wires to entangle animals. This applies for wildlife as well as livestock.	WY	Both	emc0050RM
80.	The BLM could make it a point to distribute the B.t.i. Briquets within 3 miles of nesting and lek areas on standing large bodies of water. These are not poisonous to wildlife (if directions are followed) and should only be distributed on waters not for human consumption. An incorrect use of these might cause litigation of mismanagement due to animal illness. The Briquet will prevent the mosquito larvae from thriving and help decrease the chance of spreading West Nile.	WY	BLM	emc0050RM
81.	In Steptoe Live Stock Co. V. Gulley, 295 P. 772 (1931) the Supreme Court of Nevada held that the establishment of livestock trails providing access to water sources was sufficient to constitute a valid appropriation and establishment of water rights. There are numerous other precedents set by several courts showing that a livestock owner has a right to use the water on federally managed lands. BLM does not have complete authoritarian control over the federally managed land for right of water usage. The water is for multiple use not just wildlife.	WY	Both	emc0050RM
82.	Irrigation from reservoirs and dirt work systems that are in place on Federal lands should be allowed to continue. Sage grouse still need the grassy areas for food and shelter. The irrigation of the sparse grasslands ecosystems in the landscape will slow down the encroachment of the prairie dog and allow forage for more than one species survival in the area.	WY	Both	emc0050RM
83.	Work to address and prevent overuse areas by managing for good livestock distribution'.(pg. 3 attachment 8). Part of good distribution of livestock is the availability of water in harder to access areas. Livestock will not walk any farther than necessary to reach water. All wells and other water resources such as develop springs and reservoirs placed away from natural riparian areas will help protect those riparian areas. Authorize new water development for diversion from spring or seep source only when priority sage-grouse habitat would benefit from the development(page 16 National) The more water available in a pasture the less use any one watering place will have and the less damage to sage grouse habitat in the area. There needs to be several areas of water available to prevent one part of a pasture from being overused.	WY	Both	emc0050RM
84.	Reduce the potential for West Nile Virus by eliminating surface discharge of produced water for oil and gas. BLM should implement policies that reduce and eliminate the discharge of produced water on the surface in order to reduce the breeding environment for the culex mosquito which is the carrier of West Nile Virus.	WY	BLM	emc0129RM
85.	Reduce the potential for West Nile Virus by eliminating surface discharge of produced water for oil and gas. BLM should implement policies that reduce and eliminate the discharge of produced water on the surface in order to reduce the breeding environment for the culex mosquito which is the carrier of West Nile Virus.	WY	BLM	emc0129RM
86.	The problems that sage grouse are having in the Powder River Basin have been compounded by the proliferation of CBM wastewater impoundments, which serve as habitat for mosquito larvae and increase the incidence of West Nile Virus (WNv). Naugle et al. (2004) reported that WNv was a dominant cause of mortality for certain sage grouse populations between 1998	WY	Both	emc0343GB

Table C-14.A
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	and 2002. Taylor et al. (2012) found that as well densities increase to 8 wells per square mile in the Powder River Basin of Wyoming, a single West Nile virus outbreak is predicted to reduce active sage grouse leks from 360 to 6.			
87.	A collateral impact of coalbed methane development is increased threat of West Nile virus, which is deadly to sage grouse (Naugle et al. 2004). Coalbed methane ("CBM") wastewater ponds are known to provide ideal habitat for the Culex spp. mosquitoes which carry the WNv and infect sage grouse. Mosquito infection with WNv associated with Powder River Basin CBM wastewater ponds was demonstrated by Naugle et al. (2004). While West Nile virus has been a lesser cause of mortality for sage grouse over the last two years, this does not guarantee that a major outbreak will not sweep across the sage grouse range at some time in the near future, as illustrated by the repeated outbreaks of similarly non-native Yersinia pestis in black-tailed prairie dogs. West Nile virus is a significant threat to sage grouse, and has contributed to population declines (Naugle et al. 2004, 2005). In laboratory experiments, the demonstrated ability of sage grouse to develop immunity to this disease has been shown to be very poor (Clark et al. 2006), and resistance to the disease in wild grouse populations is very low (Walker et al. 2007). Coalbed methane development in some parts of the sage grouse range has been associated with surface disposal of produced water, which typically entails the construction of infiltration reservoirs or local flooding, or both. Coalbed methane wastewater ponds have been shown to increase habitat for the Culex spp. Mosquitoes which carry the WNv and infect sage grouse (Doherty 2007). In the Powder River Basin, the interaction of West Nile virus with standard-density coalbed methane development has been predicted to result in the "functional extirpation" of the population (Taylor et al. 2012, see Attachment 2). Indeed, according to these researchers, "if development continues, future viability of the already small sage-grouse populations in northeast Wyoming will be compromised." To add to the problem, reservoirs attract sage grouse predators, and as a result Dzialek et al. (2011) recommended siting reservoirs and other water features more than 200m from nesting habitat.	WY	Both	emc0343GB

Table C-14.B
Comments Related to Soils

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	Comment: Soil productivity ! Soil productivity needs to be explicitly addressed when considering EIS alternatives, activity plan development, and plans of operation. Burying of lines, constructing roads, installing livestock facilities, and many other infrastructure activities seek to exploit the deepest, most productive soils which often results in disproportionate degradation of habitat. Similarly, livestock management regimes have historically targeted the most productive rangelands for grazing, with disproportionately large impacts to habitat. Addressing soil productivity in conjunction with potential changes in livestock grazing will better inform decision makers about not only what changes might result from altering livestock use. It will also identify areas where reductions in grazing could be expected to yield disproportionate positive responses in the rate and amount of habitat improvement.	All	Both	emc0113GB
2.	Livestock grazing is considered the single most important influence on sagebrush habitats and fire regimes throughout the Intermountain West in the past 140 years (Knick et al. 2005: 68). Grazing is the most widespread use of sagebrush steppe and almost all sagebrush habitat is managed for grazing (Connelly et al. 2004; Knick et al. 2003; Knick et al. 2011).6 Livestock grazing disturbs the soil, removes native vegetation, and spreads invasive species in sagebrush steppe (Knick et al. 2005). Cattle or sheep grazing in sage grouse nesting and brood-rearing habitat can negatively affect habitat quality; nutrition for gravid hens; clutch size; nesting success; and/or chick survival (Connelly and Braun 1997; Beck and Mitchell 2000; Barnett and Crawford 1994; Coggins 1998; Aldridge and Brigham 2003). Livestock may directly compete with sage grouse for grasses, forbs and shrub species; trample vegetation and sage grouse nests; disturb individual birds and cause nest abandonment (Vallentine 1990; Pederson et al. 2003; Call and Maser 1985; Holloran and Anderson 2003; Coates 2007).	All	Both	emc0343GB
3.	Recovery of microbiotic crusts must be a goal for rehab/reclamation/restoration from disturbance.	All	Both	emc0411GB
4.	We need a source of ecological site maps, derived from NRCS soils data, overlain with data on fires and vegetation and land treatments to predict vegetation states across landscapes. These should be maintained at both a fine scale, using SSURGO soils data, and a broader scale, Llsing STATSGO soils data Wurk at different scales could u..<:;e the appropriate data.	All	BLM	fxc0011gb
5.	Data shows that successful grazing systems were found to have significantly (p=0.01) less grazing during the "hot season" (July through early September) (12.5 d) than unsuccessful systems with 33 .4d. Likewise, the duration of all livestock treatments was significantly (p=0.001) shorter in successful systems (28.2d) compared to 59.3 d in unsuccessful systems. Given the reluctance of cattle to disperse from riparian areas, the duration of grazing treatments becomes a key factor in determining the severity of impacts such as trampling and mechanical damage, soil compaction, and utilization. A combination of longer duration and more frequent fall grazing deteriorated woody species vigor and regeneration, contributing to diminished floodplain function and reduced riparian dependent values.	All	Both	rmc0024GB
6.	Avoid livestock water developments and salt grounds in traditional sage grouse spring, summer, and fall habitats. These developments significantly concentrate livestock and increase forage use, trailing, and soil compaction that fragment sagebrush habitat. These heavy-use areas may extend up to 0.8 km away from the site providing a niche for noxious weeds and other undesirable or unpalatable vegetation to take hold.	All	Both	rmc0024GB
7.	i. Lander, WY RMP Because of the aggressive nature of invasive species, such as cheatgrass, we support flexibility for treatment of invasive species. Managers should be permitted to use chemical treatments in extreme conditions, as noted for Alternative D, understanding that prevention is the most effective approach. The value of avoiding unnecessary soil	East	Both	emc0089RM

Table C-14.B
Comments Related to Soils

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	disturbances and implementing aggressive reclamation where needed cannot be emphasized enough. The use of chemical treatments should be minimally used and only after thorough consideration of other measures and a comprehensive review of potential impacts to existing resources (plant, wildlife, water sources, etc from chemical use. For example, the DEIS notes that broad-spectrum insecticides should not be used in grouse brood-rearing areas because of the adverse impacts to non-targeted insects that are critical to young grouse. (DEIS at 865).			
8.	The NOI and the Technical Team Report omit entirely the variation of soils and relation of soils to sage brush habitat. By way of example, much of southwestern Wyoming has alkaline or sodic soils, which will not support sage brush. This and other limitations will apply throughout the Rocky Mountain and western rangelands. No EIS should be written without a Level III analysis of the soils.	East	Both	emc0155rm
9.	i. Lander, WY RMP Because of the aggressive nature of invasive species, such as cheatgrass, we support flexibility for treatment of invasive species. Managers should be permitted to use chemical treatments in extreme conditions, as noted for Alternative D, understanding that prevention is the most effective approach. The value of avoiding unnecessary soil disturbances and implementing aggressive reclamation where needed cannot be emphasized enough. The use of chemical treatments should be minimally used and only after thorough consideration of other measures and a comprehensive review of potential impacts to existing resources (plant, wildlife, water sources, etc from chemical use. For example, the DEIS notes that broad-spectrum insecticides should not be used in grouse brood-rearing areas because of the adverse impacts to non-targeted insects that are critical to young grouse. (DEIS at 865).	WY	Both	emc0089RM
10.	In Wyoming, Wyoming big sagebrush dominates the vast majority of sage grouse habitat throughout the state, both in the Wyoming Basins Ecoregion and on the Great Plains. Natural fire return intervals in Wyoming big sagebrush average 100-240 years (Baker 2007). Wyoming big sagebrush recovers slowly after fires, which typically result in 100% sagebrush mortality; recovery to pre-fire canopy cover takes over 100 years (Cooper et al. 2007). Baker (2007) examined the same issue and projected that Wyoming big sagebrush recovery following fire ranges from 50 – 120 years; for mountain big sagebrush, the recovery period was estimated at 35 – 100 years. Prescribed fire can result in a loss of sagebrush dominance for 25-45 years, and may also result in increased erosion (Sedgwick 2004). Cooper et al. (2007) projected the full recovery of Wyoming big sagebrush canopy cover would take 625 years based on their observed recovery rates following prescribed fire (a biologically improbable outcome), and no recovery at all was recorded following prescribed fire on 17 of 24 sites. Close proximity to seed sources and moister conditions did not accelerate recovery in this study. These researchers concluded, "Wyoming big sagebrush recovery takes so long that managers considering prescriptive burns need to have a long-term view of the landscape before eliminating a sagebrush habitat that will not return for at least a century" (Cooper et al. 2007:12).	WY	Both	emc0343GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
1.	Decreases in the quality of habitat may have direct impacts on greater sage-grouse populations. WWF encourages the BLM to address the potential impacts of climate change on the spread of invasive plants, particularly cheatgrass (Bromus tectorum), which may highly alter the quality of habitat by outcompeting native grasses and forbs and causing increased frequency and severity of wildfires, which are detrimental to fire-intolerant sagebrush species.	All	BLM	emc0034RM
2.	The sage grouse plans must include scenario plans for climate change. The sage-steppe is predicted to be vulnerable to climate change and may already be experiencing the effects such as altered fire regimes, invasion by exotic plants, expansion of juniper woodlands, reduced surface water availability. The plans should explicitly include policies to help hedge against uncertainty. One way to do this is to recognize climate change (and the effects described above) as stressors on the species, and to plan for ways to accommodate these new stressors be reducing other stressors such as those caused by habitat fragmentation and modification resulting from livestock grazing, OHVs, energy development, and weeds.	All	Both	emc0078GB
3.	Climate change (i.e. increased temperatures) is declared as a given and projected as a significant influence on grouse survivability. There are four pages in the Form explicitly discussing how government scientists are studying this phenomenon on behalf of sage grouse.	All	Both	emc0087GB
4.	Lastly, the effects of climate change should be addressed in reference to how they may impact future habitat management decisions. Contemporary attempts to protect and manage greater sage-grouse habitats may prove futile, if climatic changes dramatically alter these environments making them unsuitable for greater sage-grouse.	All	Both	emc0099GB
5.	Plans should address the many uncertainties related to climate change.	All	Both	emc0169GB
6.	Although there is little we can do to effect the changing climate, we do need to recognize it. Last year was very wet. The desert was full of forage. I saw more sage grouse than I had in a long time. This year has been very mild and dry. I expect to see few sage grouse. When determining whether one treatment was successful or not we need to always be mindful of the weather's impact-good or bad.	All	Both	emc0172GB
7.	Weather has a definite effect on bird mortality, but that is minor when compared to the predator load	All	Both	emc0208GB
8.	Roadless sagebrush habitat will also become increasingly important to facilitate species' adaptation to climate change	All	Both	emc0234GB
9.	4. BLM should coordinate and utilize all of the data available from its Rapid Ecoregional Assessments to address the impacts of climate change.	All	Both	emc0234GB
10.	In particular, the REAs will contain important information on the impacts of climate change, which BLM has a duty to analyze and will be incredibly important in crafting a recovery strategy for sage-grouse. Secretarial Order (S.O.) 3289 unequivocally mandates all agencies within the Department of interior to "analyze potential climate change impacts when undertaking longrange planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." S.O. 3289, incorporating S.O. 3226. The sage-grouse process falls squarely under this guidance and BLM must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document	All	Both	emc0234GB
11.	In addition to evaluating the impacts of climate change to sage-grouse habitat, BLM has the authority to manage and plan for emerging issues and changing conditions that climate change is having an effect on. Under FLPMA, multiple use management requires BLM to look at the longterm future needs and conditions of the public lands and future generations and adjust	All	Both	emc0234GB

Table C-15
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Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
	management accordingly. 43 U.S.C. § 1702(c). Additional pertinent requirements of FLPMA that specifically apply to land use planning include using "a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; consider[ing] relative scarcity of the values involved; and weigh[ing] long-term benefits to the public against short-term benefits. /d. FLPMA also provides that BLM must "take any action necessary to prevent unnecessary or undue degradation to managed resources." 43 U.S.c. § 1732(b). Collectively, the provisions of FLPMA highlighted above necessitate on the- ground implementation of climate change policies.			
12.	Further, a vigilant science-based monitoring system should be set out in the sage-grouse process in order to address unforeseeable shifts to the ecosystem. "Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or whether there is new data of significance to the plan." 43 C.F.R. § 1610.4-9. Such vigilant monitoring is absolutely necessary in order to create an effective adaptive management framework in the face of climate change.	All	Both	emc0234GB
13.	Recommendations: BLM should use information derived from the Rapid Ecoregional Assessments, when completed, to infonn management options for the protection and recovery of the greater sage-grouse. This includes using the REAs to analyze and address the impacts of climate change on sage-grouse habitat and crafting solutions to allow habitat to adapt to and minimize adverse effects of climate change. Science-based monitoring should be incorporated into the sage-grouse EIS process in order to make adjustments to respond to climate change and other stressors.	All	Both	emc0234GB
14.	BLM should make recommendations for the expansion of the National Landscape Conservation System to conserve, protect and enhance sagebrush ecosystems in the face of climate change.	All	Both	emc0234GB
15.	b. The National Conservation Lands provide BLM with a laboratory to manage public lands at the landscape-level in the face of climate change. BLM is in a unique position among public land agencies to lead a coordinated response to global climate change across the West. A shift to landscape-level planning and management could begin by utilizing the National Landscape Conservation System (National Conservation Lands) as a laboratory. As an innovative and evolving system of landscape conservation, the National Conservation Lands should drive the integration of science and management and help connect western lands and waters in a manner that helps these systems adapt to stressors that will be exacerbated by climate change	All	Both	emc0234GB
16.	The BLM Conservation Lands are to be managed at a "landscape-level." These lands are surrounded by a sea of state, private, and other federal lands that must be integrated with the diverse classifications ofBLM lands when considering management actions. When viewed at the landscape level and incorporating and coordinating across other public land jurisdictions, climate change adaptation can involve a coordinated effort of connected landscapes across the West. There is no other agency with this type of massive landscape-level climate laboratory at its disposal to help address climate change. This laboratory will prove to be incredibly valuable for sustaining sage grouse populations on BLM lands in the face of climate change.	All	Both	emc0234GB
17.	Recommendations: BLM should actively research the impacts of climate change and other stressors on sage grouse habitat as part of the strategy to recover populations. BLM's plan should include specific direction for the role that the National Conservation Lands and science can play in addressing and mitigating the impacts of climate change.	All	Both	emc0234GB
18.	The criterion to ensure compliance with air quality laws and to include consideration of climate change seems to be beyond the scope of the sage grouse plan amendments.	All	Both	emc0242GB

Table C-15
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Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
19.	Air Quality and Climate Change should not be a planning issue during this process. The RMP amendments should focus only on the analysis of sage grouse habitat protection and refrain from revising other elements of existing RMPs.	All	Both	emc0242GB
20.	7) Climate has never been static. The decades have cycled warmer and cooler for the entirety of earth's questionable existence. We are now coming out of a small ice age and according to new data entering back into another. Managing for climate's varied and unknown patterns would be like managing volcanoes. Please do not waste time and monies on a political tool called global warming or climate change.	All	Both	emc0257GB
21.	Climate change (i.e. increased temperatures) is declared as a given and projected as a significant influence on grouse survivability. There are four pages in the Form explicitly discussing how government scientists are studying this phenomenon on behalf of sage grouse.	All	Both	emc0274GB
22.	There are also several cumulative effects that must be considered. For example, livestock grazing in combination with drought and climate change can have a severe impact on sagebrush communities. Fire risk to sagebrush habitats may also increase, as livestock consume native vegetation and spread noxious weeds and invasive plants. And when grazing is combined with other disturbances, sagebrush habitats may experience greater shrub loss and increase the chances of the introduction and spread of cheatgrass compared to landscapes having a single source of disturbance.	All	Both	emc0276GB
23.	Climate change is a growing concern that is currently being recognized by land management agencies across the country as an impact that must be considered in making land management and project decisions. The Intergovernmental Panel on Climate Change has concluded that warming of the climate is unequivocal, and that continued greenhouse gas emissions at or above current rates will cause further warming. Climate change predictions may affect greater sage-grouse populations as the impacts of climate change interact with other stressors to exacerbate negative effects on sage-grouse populations.	All	Both	emc0276GB
24.	As the climate warms, associated climate impacts such as shifts in timing and amount of precipitation and changes in seasonal high, low, and average temperatures may significantly alter distributions of individual species and ecosystems. For example, some species that can only survive in cooler weather may be pushed further north or higher in altitude to seek cooler climates. This shift may affect all plant and animal species, as the equilibrium of predator and prey species shifts and the natural balance of ecosystems is altered.	All	Both	emc0276GB
25.	Climate change will not only affect the distribution of wildlife but also affects vegetation and plant life. Although most plants respond positive to increased carbon dioxide levels, many invasive nonnative plants respond with greater growth rates than native plants, including cheatgrass. Similarly, field studies reveal that cheatgrass demonstrates significantly higher plant density, biomass, and dispersed seeds at elevated carbon dioxide levels. Depending on the future precipitation regime, studies anticipate that cheatgrass is likely to move northwards, leading to expansion into Idaho, Montana, and Wyoming. This prediction, in conjunction with analyses suggesting large displacement and reduction of sagebrush habits as a result of climate change as early as 2030, increases the likelihood that climate change will negatively and potentially severely impact sage-grouse and sagebrush habitat. Additionally, cheatgrass invasion may also lead to an increase in the likelihood and severity of fires, causing further damage to an already weakened habitat.	All	Both	emc0276GB
26.	Climate change may also exacerbate stressors such as disease. For example, temperature and precipitation both directly influence the potential spread and infection of West Nile virus, the most serious disease affecting sage-grouse. Increased temperatures associated with climate change could directly increase the prevalence of West Nile virus, threatening the	All	Both	emc0276GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
	likelihood of an increase in the presence of the disease across sage-grouse populations.			
27.	Climate change may also exacerbate stressors such as disease. For example, temperature and precipitation both directly influence the potential spread and infection of West Nile virus, the most serious disease affecting sage-grouse. Increased temperatures associated with climate change could directly increase the prevalence of West Nile virus, threatening the likelihood of an increase in the presence of the disease across sage-grouse populations.	All	Both	emc0276GB
28.	Resting pastures during a year with average or above average growing-season precipitation provides a better opportunity for plants to recover health (since they are actively growing) than rest during drought (as the plants are dormant). Please consider prescribing rest from drought in this manner, as to minimize economic hardship and maximize plant recovery.	All	Both	emc0281GB
29.	Cattle, mule deer, pronghorn, pygmy rabbits, sagebrush passerines, cut-throat trout and cattle can all thrive. This type of rotational grazing strategy (providing rest for recovery) meets all four rangeland health guidelines, and provides a 'drought reserve' in that if needed pastures planned to be rested season-long may be grazed late in the year (during dormancy) if drought occurs.	All	Both	emc0281GB
30.	Page 7-"If periods of drought occur, where appropriate evaluate the season of use and stocking rate and adjust through coordination and annual billings processes." The BLM allotments and associated private lands in sagebrush country provide habitat for diverse wildlife species as well as providing the economic base for these rural counties. Successful livestock operations plan at least one year in advance, and the most successful plan for contingencies such as drought. Reducing stocking rate during the first year of a drought can be devastating to producers, and is often marginally beneficial to the land. However, with advance notice and consultation, operators can generally find alternatives allowing them to reduce stocking rate in subsequent years of a multi-year drought, and especially during the first 'Normal" rainfall year following a drought. Resting pastures during a year with average or above average growing-season precipitation provides a better opportunity for plants to recover health (since they are actively growing) than rest during drought (as the plants are dormant). Please consider prescribing rest from drought in this manner, as to minimize economic hardship and maximize plant recovery.	All	Both	emc0303GB
31.	Cattle, mule deer, pronghorn, pygmy rabbits, sagebrush passerines, cutthroat trout and cattle can all thrive. This type of rotational grazing strategy (providing rest for recovery) meets all four rangeland health guidelines, and provides a 'drought reserve' in that if needed pastures planned to be rested season-long may be grazed late in the year (during dormancy) if drought occurs.	All	Both	emc0303GB
32.	Evaluate the synergistic effects of climate on invasive annual grasses and altered fire regime.	All	Both	emc0305GB
33.	Factor in climate change in all land-use decisions in sage grouse habitat.	All	Both	emc0305GB
34.	Determine the interactive effects of climate change and sagebrush production of toxins.	All	Both	emc0305GB
35.	The BLM must account for the significant impacts of climate change at regional scales, and work to develop connections and corridors to ensure long-term habitat connectivity for sage-grouse.	All	BLM	emc0308GB
36.	The EIS must specifically identify the types of impacts from climate change on sage grouse habitat, and provide quantifiable scientific data and analysis to support those conclusions.	All	Both	emc0310GB
37.	Climate change is projected to impact sagebrush habitats, and also to potentially impact sage-grouse survival and reproductive	All	Both	emc0339GB

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Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
	success. Despite this fact, climate change is not listed as a preliminary issue in the Notice of Intent for the greater sage-grouse planning process. This oversight has to be effectively remedied at the Draft EIS stage, the agency must include a comprehensive analysis of the predicted climate change impacts to sage-grouse and any proposed management regime must take into account the cumulative effect of climate change and other impacts and provide protections sufficient to recover and conserve the sage-grouse despite these threats. Climate change impacts that must be analyzed include, but are not limited to: · Increased temperature and increased precipitation allowing expansion of woody vegetation from higher elevations. · Increased temperature and decreased precipitation shifting the balance toward more drought-tolerant desert plants. · Alteration in fire regime from a warmer climate, which would be problematic for fire intolerant sagebrush. · The spread of invasive annual grasses, such as cheatgrass, which have a very different growth form than the native bunch grasses and can lead to more severe fire. · Drought conditions, which have been shown to negatively impact nest success. · West Nile virus, which may worsen with warmer summertime temperatures that speed the development of the virus within the vector mosquitoes.			
38.	Neilson et al. (2005) compared nine climate models, and found that the probability of sage grouse habitat persistence was greatest in south-central and southeast Wyoming. Schrag et al. (2011) preformed a similar, more recent analysis and came to a similar conclusion. These researchers point to southwestern Wyoming as a hotspot for Wyoming big sagebrush persistence, and in light of the increased risk of major West Nile virus outbreaks in projections based on climate models, they recommend focusing extra conservation attention on this region, calling sage grouse habitats in southwestern Wyoming "important core refugia."	All	Both	emc0343GB
39.	Neilson et al. (2005) compared nine climate models, and found that the probability of sage grouse habitat persistence was greatest in south-central and southeast Wyoming. Schrag et al. (2011) preformed a similar, more recent analysis and came to a similar conclusion. These researchers point to southwestern Wyoming as a hotspot for Wyoming big sagebrush persistence, and in light of the increased risk of major West Nile virus outbreaks in projections based on climate models, they recommend focusing extra conservation attention on this region, calling sage grouse habitats in southwestern Wyoming "important core refugia."	All	Both	emc0343GB
40.	At minimum, the NEPA analysis should address the following: • Evaluating the impact of climate change on the likely future distribution of sage grouse habitats, and setting forth a framework for maintaining sage grouse populations in the event of spatial shuifts in habitat availability and/or quality.	All	Both	emc0343GB
41.	At minimum, the NEPA analysis should address the following: • Assessing the impact of air pollution on the health and fitness of sage grouse, and requiring green completions to reduce smog creation.	All	Both	emc0343GB
42.	The NOI mentions climate change as a major factor. So little is known about how climate change will affect rangeland habitat that this will be an exercise in speculation. CLG suggests that the EIS process focus on site specific issues instead.	All	BLM	emc0371GB
43.	We have reviewed the Preliminary Planning Criteria for the National Greater Sage-Grouse Strategy, dated January 2012 and offer the following comments: The criterion to include consideration of climate change seems to be beyond the scope of the sage-grouse plan amendments.	All	Both	emc0376GB
44.	We have reviewed the Preliminary Planning Criteria for the National Greater Sage-Grouse Strategy, dated January 2012 and offer the following comments: Air Quality and Climate Change should not be a planning issue during this process. The RMP amendments should focus only on the analysis of sage-grouse habitat protection and refrain from revising other elements of	All	Both	emc0376GB

Table C-15
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Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
	existing RMPs.			
45.	We have reviewed the Preliminary Planning Issues dated January 2012 and offer the following comments: Air Quality and Climate Change should not be a planning issue during this process. The RMP amendments should focus only on the analysis of sage-grouse habitat protection and refrain from revising other elements of existing RMPs.	All	Both	emc0376GB
46.	In semi-arid rangeland regions vast extremes in precipitation often occur, especially during the major growing season for forbs, which is late March to early July. This variation can be as high as 300% between seasons, years, and groups of years. The resulting variation in production of plant species, especially annual and perennial forbs, can cause extreme variability of Greater Sage Grouse (GSG) reproduction levels.	All	Both	emc0388GB
47.	The BLM and USFS should also analyze the effects of climate change on sagebrush steppe, a recognized threat to sage-grouse (Connelly et al. 2011: 556, Table 24.2) that is predicted to have deleterious impacts on sagebrush steppe (Neilson et al. 2005; see Map 6). Climate change effects should be assessed individually and cumulatively with other land uses, such as livestock grazing. For example, Catlin et al. (2011) evaluated BLM grazing management in sagebrush steppe, illustrating the importance of achieving ecosystem potential to buffer against the effects of climate change and documenting problems with BLM monitoring and management that prevent improvement in conditions. The Secretary of Interior has directed each bureau and office to "consider and analyze potential climate change impacts when undertaking long-range planning exercises…[and] developing multi-year management plans, and making major decisions regarding the potential use of resources under the Department's purview" (Secretary of the Interior Order no. 3289, Amendment no. 1). The proposed comprehensive, multi-year planning effort for sage-grouse should analyze potential climate change impacts in accordance with the Secretary's order.	All	Both	emc0391GB
48.	Up to 80 percent of remaining sagebrush steppe could be lost to the direct or indirect effects of global warming (Wisdom et al. 2005c: 206, citing Neilson et al. 2005). Average temperature has already increased 0.6 - 1.1° F in the last 100 years in the Great Basin (Chambers 2008a). Raupach et al. (2007) discovered that the growth rate in anthropogenic CO2 emissions increased more rapidly between 2000 and 2004 than even predicted by the highest growth rate (i.e., "worst case") scenario developed by a leading intergovernmental organization in the late 1990s. Drought may also contribute to increased atmospheric CO2 by reducing the amount of CO2 that is annually taken up by terrestrial vegetation (Peters et al. 2007). Increased CO2 may, in turn, favor invasive, annual grasses, including cheatgrass (Smith et al. 2000). Climate change could be a significant threat to Greater Sage-grouse (van Kooten et al. 2007). Moynahan et al. (2007) reported that drought effects sage-grouse nesting probability. Holloran et al. (2005) noticed that annual sage-grouse nest success rates were positively correlated with the precipitation in the previous year. Increased temperatures are expected to dry out sagebrush steppe and may intensify the effects of other threats to sage-grouse, such as livestock grazing, invasive species and fire frequency (Alridge et al. 2008). Increased temperature may extend the fire season in the western United States and increase total area burned in some regions (McKenzie et al. 2003; Baker 2011). The World Wildlife Fund modeled predicted effects of climate change on Wyoming big sagebrush and silver sagebrush in Wyoming, Montana, North Dakota, and South Dakota (Schrag and Forrest 2008, unpublished data). Results suggested a decrease in distribution of Wyoming big sagebrush by approximately 76-81 percent and a decrease in silver sagebrush of 71-80 percent by 2030 (Schrag and Forrest 2008, unpublished data). The authors contended that increased temperatures will also lead to the increased spread of WNv and these factors, combined with	All	Both	emc0391GB

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	habitat loss and degradation from continued land uses, may threaten sage-grouse with extinction (Schrag and Forrest 2008, unpublished data).			
49.	Climate change. Issue: Degraded habitat has less resilience and this loss of resilience amplifies the negative impacts of climate change on sage-grouse and sagebrush steppe.	All	Both	emc0391RM
50.	For instance, the CCSM Project, which is estimated to produce enough clean electricity to power approximately 1 million households, will result in a reduction in C02 emissions of7 million to 11 million tons a year, equivalent to the emissions of over 1 million automobiles. C02 has been identified as a major contributor to greenhouse gases, which are believed to contribute to global climate change. Global climate change threatens the survival of all species, not just greater sagegrouse	All	Both	emc0399GB
51.	We recommend that the goal of the landscape-scale assessment should be to contribute to the persistence, distribution and diversity of the ecoregional biota and all its natural components and processes today and in the future, while accommodating other land uses, activities or project its and importantly, adapting to climate change.	All	Both	emc0407GB
52.	Landscape-level biological linkage areas required for the continued functioning of biological and ecological processes and allowing for long-term shifts in distribution of native species in response to climate change;	All	Both	emc0407GB
53.	Biodiversity of native species is a significant issue that must be considered. A new and important paper in science demonstrates that "preservation of plant biodiversity is crucial to buffer negative effects of climate change and desertification in drylands." BLM must fully analyze the adverse impacts on biodiversity of imposing sacrifice areas on large areas of what remains of the West's sagebrush habitats. Sage-grouse, and certainly not many actions claiming to "improve" conditions for sage-grouse, are not an adequate umbrella for protection of many species. Further, sagebrush lands, and interfacing biome areas with the Mojave region, are proposed to be sacrificed for large-scale remotely-sited industrial solar developments. These lands may be crucial for migrating sagebrush biome birds, and preservation of biodiversity.	All	BLM	emc0411GB
54.	It's hard to understand how sacrificing large and significant sagebrush areas by imposing a Core Model, plus then allowing even more development to occur within Core Areas, could be considered biologically tenable conservation planning. This also assumes at least in part a fairly constant unchanging environment in the chosen core areas. But natural disturbances are unpredictable, and habitat conditions, especially with climate change, may occur quickly. Disease outbreaks are unpredictable. Aroga sagebrush defoliating moth outbreaks are unpredictable. Weeds emanate outward from disturbed areas (caused by grazing degradation, roading, other disturbances). Weeds then adapt to local conditions, and then explode across landscapes. Climate change is likely to amplify the adverse impacts of weed invasions and likely increase the slow recovery time for lower elevation sagebrush communities where many leks are located. So the habitat quality/suitability of lower elevation nesting habitats - if continued weed expansions and chronic grazing and other disturbances and climate change and desertification processes continue are very likely to continue to decline. Vegetation communities pass the point of no return with cheatgrass/medusahead, or other exotic annual grass invasion. We know no successful known large scale restoration of cheatgrass/medusahead. Many changes that are occurring across the sagebrush biome are long-term or irreversible.	All	Both	emc0411GB
55.	The value of each grid cell is a function of the number and proximity of leks in the surrounding landscape. We attributed each cell with counts of males at leks within a radius of 6.4 km (4.0 mi). We chose this distance because nesting females distribute their nests spatially in relation to lek location with 79% of nests located within a 6.4 km (4.0 mi) radius from lek-of capture (Table B-1 in Colorado Division of Wildlife 2008). In some other areas, distances are much greater, and birds move over vast	All	Both	emc0411GB

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	areas. Where is the modeling that shows what happens to a population if, in Colorado DOW instance cited here, 21% of the nesting habitat and all the wintering habitat outside this circle is developed? It ignores the different movement and landscape use characteristics of populations. It ignores that leks are typically located on snow-free areas, which are relatively lower elevation. Relatively lower elevation areas are most susceptible to cheatgrass and other weed invasions, and more difficult to recover. Just protecting nesting habitats closest to currently more abundant leks may be a large mistake as grazing-facilitated cheatgrass and climate change act synergistically to promote cheatgrass dominance of understories at lower elevations. It ignores analysis of climate change effects where snow-free areas may increasingly extend to higher elevations. Thus a shift in lek sites over time may occur and is very likely – but if the higher elevations are near the periphery or outside the little core lek circles altogether, the Doherty Core and BLM PPH modeling will have already sacrificed away these very habitats that are needed for sage-grouse population resiliency in the face of climate change.			
56.	One major threat to the sagebrush steppe ecosystem that was neglected in your Notice of Intent is climate change. The Environmental Impact Statements should analyze and develop alternatives that will benefit the integrity of the sagebrush ecosystem and associated species of conservation concern, as well as develop strategies to address climate impacts	All	Both	fld0000rm, fld0000gb
57.	Also, please include the impacts of global climate change in the EIS. And - as is appropriate in every EIS - please include the "contributions" of livestock grazing and emissions to climate change. While the facts may upset the livestock industry, the scientific analyses for which you are responsible must no longer bow to political pressure.	All	Both	fld0006rm, fld0006gb
58.	The BLM must account for the significant impacts of climate change at regional scales, to ensure long-term habitat connectivity for sage-grouse.	All	Both	flk0000gb
59.	Climate Change Ongoing climate change research as summarized by the United Nations Intergovernmental Panel on Climate Change (IPCC) concludes that climate is already changing and that the change will accelerate. Some degree of future climate change will occur regardless of future greenhouse gas emissions. Adapting to or coping with climate change will become necessary in certain regions and for certain ecological systems. We recommend that the EISs describe how proposed conservation measures would account for climate change considerations. We recognize the challenge that climate change adaptation presents and suggest the following resources to assist in your climate change analysis and adaptation efforts. Resources for doing this include: • The Council on Environmental Quality's Draft "NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions "5 • The 2011 background paper, "National Fish, Wildlife and Plants Climate Adaptation Strategy Shrub land Ecosystems"6 • The University of Washington Climate Change Sensitivity Database's summaries of the inherent climate change sensitivities of cheatgrass and greater sage-grouse The Wildlife Habitat Connectivity Working Group's August 20 11 report, "Washington Connected Landscapes Project: Climate-Gradient Corridor Report"	All	Both	rmc0020RM
60.	The EIS should evaluate and analyze whether the decline of sage grouse is related to climate change and provide scientific data and analysis to support any conclusions made. The natural cycle in wildlife populations is well known. The EIS should analyze the natural cycle of wildlife populations and how it relates to sage grouse.	All	Both	rmc0035GB
61.	Climate Change: This item must be removed from the discussion of any management policy change. The earth's climate has been changing since the dawn of time.	CO	Both	emc0133GB

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62.	Recent modeling studies have shown the possible expansion of cheatgrass in the Eastern Region under various climate-change scenarios (Bradley 2009).	East	Both	emc0034RM
63.	The NOI mentions climate change as a major factor. So little is known about how climate change will affect rangeland habitat that this will be an exercise in speculation. VRLP suggests that the EIS process focus on site specific issues instead.	East	Both	emc0155rm
64.	Nielson et al. (2005) have cited sagebrush-steppe as one of the ecotypes most vulnerable to the impacts of climate change. Under bioclimatic model scenarios, sagebrush is simulated to shift northward with a significant contraction of its current range by 2099. Sagebrush is limited by summer moisture stress. Likewise, increases in the frequency of fires under future climate scenarios would facilitate simulated potential range contraction because of sagebrush's long recovery periods following fire. Other potential outcomes of increasing carbon dioxide levels and a warming climate include: accelerated invasion by exotic plants, conifer encroachment, loss of surface waters, and spread of West Nile virus. The Secretary of Interior has directed each bureau and office to "consider and analyze potential climate change impacts when undertaking long-range planning exercises…[and] developing multi-year management plans, and making major decisions regarding the potential use of resources under the Department's purview" (Secretary of the Interior Order no. 3289, Amendment no. 1). The proposed comprehensive, multi-year planning effort should analyze potential climate change impacts to sage-grouse and sagebrush habitat, both individually and cumulatively with other impacts, in accordance with the Secretary's order. Land use plans should address not only current habitat, but also the best future refugia for sagebrush-steppe habitats and sage-grouse population in relation to key climate-driven factors. Nielson projects that, based on the area of agreement between nine climate change models, south-central and southwestern Wyoming may be the most likely places in the nation to retain the sagebrush habitat in the face of changing climate (Nielson, 2005).	East	Both	emc0167RM
65.	Account for Climate Change: Land use plans should identify not only current habitat, but also the best future refugia for sagebrush-steppe habitats and sage-grouse populations in relation to key climate-driven factors like exotic plant and woodland expansion, increased fire frequency, desertification, and West Nile virus occurrence.	GB	Both	emc0355GB
66.	Sagebrush-steppe is one of the most diverse and important rangeland types and habitats for the native flora and fauna of the American West, and it has also been identified as one of the ecotypes most vulnerable to the effects of climate change (Neilson, et al. 2005). Altered fire regimes, accelerated invasion by exotic plants, woodland expansion, loss of surface waters, and spread of disease have all been cited as potential outcomes of increasing carbon dioxide levels and a warming climate (Chambers, 200815; Neilson, et al. 2005). Sensitive species such as sage-grouse are vulnerable to regional extirpation as the effects of climate change degrade sagebrush-steppe across the West (Chambers, 2008), and as warming temperatures allow diseases like West Nile virus to spread into habitats formerly inhospitable to the Culex mosquito(Gould and Higgs, 2008)16. Land use plans should address these likelihoods by identifying not only current habitat, but also the best future refugia for sagebrush-steppe habitats and sage-grouse populations in relation to key climate-driven factors like exotic plant and woodland expansion, increased fire frequency, desertification, and West Nile virus occurrence. Potential changes in climate can disrupt sage-grouse habitat (Miller et al. 2011) and BLM must consider climate when proposing land use actions including post-fire seedings. According to the NTT (page 28), BLM should consider native plants and consider seed collections from the warmer areas within a species' current range for selection of native seed (Kramer and Havens 2009). Summary: Land use plans should identify not only current habitat, but also the best future refugia for sagebrush-steppe habitats and sage-grouse	GB	Both	emc0355GB

Table C-15
Comments Related to Drought Management and Climate Change

Comment No.	Comment	SubRegion ID	Agency	CmtLtr Code
	populations in relation to key climate driven factors like exotic plant and woodland expansion, increased fire frequency, desertification, and West Nile virus occurrence.			
67.	Severe Winters: The 1964/65 winter of north central Montana greatly reduced all wildlife numbers in that area.	IDMT	Both	emc0388GB
68.	During drought periods, prioritize evaluating effects of the drought in priority sage-grouse habitat areas relative to their needs for food and cover. Since there is a lag in vegetation recovery following drought (Thurow and Taylor 1999, Cagney et al. 2010), ensure that post-drought management allows for vegetation recovery that meets sage-grouse needs in priority sage-grouse habitat areas. This statement does not specify between conservation measures to be taken in different habitats of greater sage-grouse. Elevation and site specific conservation measures need to be clarified when addressing drought periods for greater sage-grouse habitat.	NVCA	Both	emc0328GB
69.	Account for Climate Change: Land use plans should identify not only current habitat, but also the best future refugia for sagebrush-steppe habitats and sage-grouse populations in relation to key climate-driven factors like exotic plant and woodland expansion, increased fire frequency, desertification, and West Nile virus occurrence.	OR	Both	emc0385GB
70.	The 1992/93 winter in Eastern Oregon resulted in a large setback of many wildlife species in that given area.	OR	Both	emc0388GB
71.	The past dry years have allowed sagebrush to squeeze into the tiny wet meadows where the hens take their young chicks to forage. These small wet meadows need some help to get the sage out. Another recent impact that is happening to these wet meadows is on Blue Mt. there has been an explosion of elk numbers and their uncontrolled grazing is having an impact on these wet areas.	UT	Both	emc0296GB
72.	Limiting factors such as climate may have the most influence on sage-grouse populations, but we no control over weather.	WY	USFS	emc0144RM
73.	Climate is an important factor affecting sage grouse populations (South-Central Local Working Group 2007:15). Climate change scenarios in the sagebrush ecosystem predict that the largest area of sagebrush that will persist in the future is in southern and southwest Wyoming, between the northern and central Rocky Mountains (Neilson et al. 2005) According to Rowland et al. (2006:vi), this is the very area of greatest ecological diversity and high risk for future habitat degradation in the Wyoming Basins Ecoregion: "Species richness of sagebrush-associated vertebrates of concern was greatest in southwestern Wyoming, where as many as 36 of the 40 vertebrate species of concern cooccur. Moreover, some of the areas identified as most affected by anthropogenic disturbance, as estimated by our human footprint model, are also those that have the greatest species richness. Human activities occurring in southwestern Wyoming are expected to have disproportionately and substantially greater effects on a larger number of species of concern compared to other portions of the WBEA area."	WY	Both	emc0343GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
1.	The plan must address the impact of wild horse on sage-grouse habitat and direct that wild horse AML's be met annually - Also should address lowering AML's in some HMA's and consider removing horses entirely from some HMA's.	All	Both	cfc0070GB
2.	I believe that the top priority in protecting the sage grouse in the West is to bring the horse herds to levels that do not interfere with game birds, other indigenous game and cattle grazing areas	All	Both	emc0005GB
3.	Second, the ferrel horse dose nothing but destroy sage grouse habitat, they ruin water sources eat then stomp out the roots.	All	Both	emc0031GB
4.	Where wild horses have depleted sage-grouse habitat, they should be removed or reduced to a stocking rate compatible with good sage-grouse habitat	All	Both	emc0085GB
5.	I would also like to see plans made to manage wild horses on areas where sage grouse occur. We cannot continue to pretend that these two species live on different planets and do not intersect.	All	Both	emc0088RM
6.	I would also like to see plans made to manage wild horses on areas where sage grouse occur. We cannot continue to pretend that these two species live on different planets and do not intersect.	All	Both	emc0088RM
7.	Wild Horse and Burro Management The IM does not provide the justification for established Appropriate Management Levels (AML) nor does it require agencies to evaluate the negative impacts of wild horse and burro populations to the Greater Sage-Grouse or its habitat when developing or maintaining AML. As recommended by the National Technical Team report, wild horse and burro impacts to the Greater Sage-Grouse and its habitat should be analyzed and, where these impacts are found to be negative, the wild horse and burro AML should be reduced to a level where negative impacts no longer occur, and rangeland improvements should be implemented to address the direct and indirect effects to Greater Sage-Grouse populations and habitat.	All	Both	emc0108GB
8.	The County supports active removal of wild horses and burros in an effort to achieve AML. The BLM should also re-evaluate AML within priority and general habitat to ensure that it is in-line with encouraging desired habitat conditions.	All	Both	emc0130GB
9.	Further clarity should be brought to the agencies' policy regarding greater sage-grouse conservation efforts and wild horse and burro management, as well. IM 2012-043 provides that BLM is directed to manage wild horses and burros within Appropriate Management Levels (AML) and that excess horses and burros are to be removed. Department of the Interior policy on wild horse and burro management, in fact, is moving in the opposite direction. Current and proposed policy is to manage for a certain number of animals in holding pens and leave excess numbers on the rangelands. Management levels are the numbers in pens, not the number on the rangelands. This apparent internal inconsistency needs to be resolved or clarified before any greater sagegrouse management options can be defined.	All	Both	emc0140RM
10.	On a positive note, we commend the report's recognition that wild horses and burros have an impact "by reducing grass, shrub, and forb cover and increasing unpalatable forbs and exotic plants including cheatgrass." We agree that "wild equids have different grazing patterns than domestic livestock, thus increasing the magnitude of grazing across the entire landscape." As noted below, we encourage proper management of wild horses and burros as a means to improve greater sage-grouse habitat and range health, generally.	All	Both	emc0140RM
11.	I would like to see the impacts of feral horses and burros considered in the evaluation of sage grouse habitat destruction. These non-native species have no place in our high desert ecosystem, and because they have no natural predators, their populations have exceeded the carrying capacity of the habitat, and they are outcompeting native wildlife species for forage	All	Both	emc0163GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	and precious water. Their large hooves also are destroying the fragile high desert flora and damaging riparian areas			
12.	Wild Horse Management: Wild horse management on public lands has been unacceptable and we urge the BLM to control Horse Management Areas (HMAs) at Appropriate Management Levels (AMLs). Due to wild horses, a lack of responsible pasture management and irresponsible riparian and meadow management is present. We insist the BLM control wild horses at AMLs on all HMAs and especially those interfacing sage-grouse habitat.	All	Both	emc0180GB
13.	Habitat Loss is much more difficult. Sage grouse populations have existed side by side with commercial grazing for 150 years. What sage grouse populations have never before had to deal with is large population of uncontrolled horses. It seems more than coincidental that wide spread problems with declining grouse populations coincide closely with implementation of protection of "wild" horses ranging almost uncontrolled over large swaths of the American west. The horse populations have had sever adverse effects on not only sage grouse, but also on deer, elk and rabbit populations where the horses, in addition to uncontrolled year long overgrazing of critical habitat tend to trample many spring areas, destroying the open spaces necessary for water flow and effectively closing the spring, permanently destroying water sources for sage grouse as well as other game species.	All	Both	emc0200GB
14.	Part and parcel of that local assessment is to keep the feral horse populations in check to minimize the well-documented destruction of water holes that all wildlife requires for their existence.	All	Both	emc0213GB
15.	Feral horse populations are not being adequately controlled and are negatively impacting sage grouse habitat. Horses have a grazing style unlike native species that has not been properly taken into account with their ever-increasing populations.	All	Both	emc0216GB
16.	On page 18, Wild Horse and Burro Management, this is the one program for which BLM is the agency in charge and the party responsible for the management of this resource. There is no mention that the BLM will manage these animals at Appropriate Management Levels (AMLs), but only that the BLM will develop and amend herd management plans to incorporate sage-grouse habitat objections; BLM will prioritize the evaluation of all AMLs; BLM will coordinate with other resources to conduct rangeland health assessments; and BLM will address the direct and indirect effects of wild horse and burros on sage-grouse populatins and habitats in the NEPA process for range improvements for wild horses and burros. Again the double standard that exists when BLM is responsible as compared to when private entities have responsibility is clear and needs to be evaluated in the EIS. Managing wild horses to AML in Nevada would be more beneficial than all of the developing and amending, incorporating, prioritizing, coordinating, and addressing that BLM indicates it would do with respect to wild horses and burros.	All	Both	emc0239GB
17.	On page 19, Minerals section, second paragraph, there is mention of abandonment of leks by male sage-grouse if leks are repeatedly disturbed by raptors perching on power lines near leks. The mitigation measure or conservation measure should include anti-perching devices on these structures and not prevent mining or energy development. Similarly, predator control of ravens, crows, and magpies (corvids) is possible in identified nesting areas where power lines provide perches for corvids to watch for sage-grouse hens to leave the nest.	All	Both	emc0239GB
18.	The Nevada Wilderness Project respectfully requests that you address the impacts to sage--grouse and sage---grouse habitat caused by feral horses, including removal of vegetational cover necessary for nesting and brood---rearing, changes to vegetational composition that results from feral horse use, horse impacts to springs and other important free water sources	All	Both	emc0243GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	utilized by sage-grouse, possible disturbance caused by feral horses during the nesting period, infrastructure used to mitigate horse impacts (e.g., fences) and how it may negatively affect sage-grouse, any connection to West Nile Virus as that disease is recognized as affecting both horses and sage-grouse, and the potential for feral horse management actions to negatively affect sage-grouse and sage-grouse habitat.			
19.	COMMENTS ON Interim conservation Measures and Policies for Preliminary Priority Habitat, No. 2012 -043(IM interim policy and program guidance in the IM: These comments are consistent with and applicable to the strategic suggestions above for the proposed action. Wild Horse and Burro Management The IM does not provide the justification for established Appropriate Management Levels (AML) nor does it require agencies to evaluate the negative impacts of wild horse and burro populations to the Greater Sage -Grouse habitat maintaining AML. As recommended by the National Technical Team report, wild horse and burro impacts to the Greater Sage -Grouse should be analyzed and, where these impacts are found to be negative, the wild horse and burro AML should be reduced to a level where negative impacts no longer occur, and rangeland improvements should be implemented to address the direct and indirect effects to Greater Sage -Grouse populations and habitat.	All	Both	emc0254GB
20.	Please do not insist on additional provisions in land use plans to further limit grazing management options. Standards and guidelines for livestock grazing and protocols for evaluating rangeland health are well established. Wild horse and burro use must be recognized in land use plans. Their grazing use must not exceed standards and guidelines and appropriate management levels must be adhered to.	All	Both	emc0307GB
21.	With regard to wild horses and burros, the EI5 should note and quantify the presence of wild horses and burros in all sage grouse habitat areas, and quantify the impacts of horses and burros on habitat and bird populations	All	Both	emc0310GB
22.	The wild horse and burro population in the State of Nevada is estimated by the ELM to be 19,057 (17,710 horses and 1,347 burros I). The ELM has determined that the Appropriate Management Level (AML) for Nevada is 12,688 animals. It is concerning that, despite the fact that the population of wild horses and burros is at one hundred fifty-one percent (151 %) of AML, the management of wild horse and burros nor the excess population is not listed as a primary issue of concern in the NO!. This is interesting given the concern expressed regarding damage to sage-grouse habitat caused by livestock grazing.	All	Both	emc0318GB
23.	On page 18, Wild Horse and Burro Management, this is the one program for which BLM is the agency in charge and the party responsible for the management of this resource. There is no mention that the BLM will manage these animals at Appropriate Management Levels (AMLs), but only that the BLM will develop and amend herd management plans to incorporate sage-grouse habitat objectives; BLM will prioritize the evaluation of all AMLs; BLM will coordinate with other resources to conduct rangeland health assessments; and BLM will address the direct and indirect effects of wild horse and burros on sage-grouse populations and habitats in the NEPA process for range improvements for wild horses and burros. Again the double standard that exists when BLM is responsible as compared to when private entities have responsibility is clear and needs to be evaluated in the EIS. Managing wild horses to AML in Nevada would be more beneficial than all of the developing and amending, incorporating, prioritizing, coordinating, and addressing that BLM indicates it would do with respect to wild horses and burros.	All	BLM	emc0322GB
24.	Given that wild horses and burros also graze BLM managed lands, often in populations far greater than those allowed under the Wild Horse and Burros Act, the BLM's SEIS must consider management options for those populations as well.	All	Both	emc0342GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
25.	BLM needs to resolve internal policy initiative conflicts within the Department of the Interior (DOI), as they apply to renewable energy development and wild horse management. These land uses are DOI priorities even though they have the same or greater adverse impacts to sage grouse habitat as do other land uses that BLM now proposes to end or restrict;	All	BLM	emc0371GB
26.	B. Wild Horse Management and Sanctuaries All of the discussion of wild horses in the Technical Team Report omits the important facts regarding wild horse use of sage grouse habitat. Wild horses graze the rangelands year-long. Wild horses not only use the riparian areas heavily but they aggressively defend the water sources against wildlife. Their numbers increase by 18% to 23% a year. They trail in such a way that they leave permanent routes with the attendant impacts on soils, vegetation and water quality due to increased erosion from runoff. BLM, with the approval of the Interior Secretary, continues to promote wild horse sanctuaries on public lands. The sanctuaries are a central element in the national strategy adopted in 2011. The creation of sanctuaries, such as the one proposed in Nevada, will destroy sage grouse habitat since they are not subject to gathers or other management limits. As is documented in the Sheldon Wildlife Refuge, where grazing ended 17 years ago, ungathered wild horse populations damage wildlife habitat and vegetation. A wild horse sanctuary in lieu of managed cattle will have far greater impacts on rangeland resource vegetation, soils, and by extension sage brush habitat. The failure of the IM to address these policy conflicts is manifest. The EIS must do so. The BLM national wild horse strategy also reduced the number of wild horse gathers for the next several years. The cut in wild horse gathers comes at a time when few, if any, wild horse herd management areas are within their appropriate management levels (AMLs). BLM's failure to manage for AML since 1971 when Congress adopted the Wild Horse Act is well-documented as are the adverse impacts of too many wild horses on rangeland resources. The cumulative impact of the failure to consistently manage to AML must be calculated over the 40 years that the Wild Horse Act has been in effect. Thus, this BLM policy continues the documented damage to rangeland resources and any management of habitat for sage grouse must disclose and resolve the contradictory policies being pursued.	All	BLM	emc0371GB
27.	the list of preliminary issues, identified in the Federal Register Notice of Intent to Prepare Environmental Impact Statement, it is noteworthy that "Wild Horse and Burro Management" is not included as a preliminary issue. Perhaps because the BLM fails to meet its own obligations for appropriate management levels, this is not being considered as a matter for action. Almost as an afterthought in the Director's, December 22, 2011 Memorandum, "Wild Horse and Burro Management" is covered very briefly, stating that Ongoing Authorizations/Activities will: • Manage wild horses and burro population levels within established Appropriate Management Levels (AML) • Wild Horse Herd Management Areas will receive priority for removal of excess horses • Wild horses and burros remaining in Herd Management Areas where the AML has been established as zero will receive priority for removal • When developing overall workload priorities for the upcoming year, prioritize horse gathers except where removals are necessary in non-PPH to prevent catastrophic herd health and ecological impacts. Given the actual performance record of BLM in Nevada and the exceedingly over-abundance and out-ofcontrol numbers, how will the actual correction be brought about? Beyond excuses for not having enough resources, what confidence can there be that BLM will not continue to practice the management process of "do as we say, not as we do"? BLM should not "target" the uses of public land that are easy-picking without first addressing the mismanagement of the uses that are under the primary jurisdiction of the BLM itself. The Herd Management Areas in Eureka County are currently an average of 250% of AML while statewide the population numbers are 150% of AML.	All	Both	emc0383GB
28.	Wild Horses: Large numbers of wild horses existed in the GSG habitat in the 1800's and early 1900's. Wild horse populations	All	Both	emc0388GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	were the lowest when GSG populations were high from 1930 to 1970. After the Wild Horse Act was passed in 1971, horse numbers increased rapidly (i.e. in the Beaty Butte area of south central Oregon, horse numbers went from 250 in 1971 to over 1,100 in 1977, and during that same period GSG numbers decreased drastically. Also, during that period 1972-1977 growing season precipitation was lower than the worst five years in the 1930's). A high level of competition for forage and water at springs and seeps was a resulting factor.			
29.	I believe that this plan should have some predator management and horse management, the BLM has historically fallen short of maintaining the horses AML's in this state, horses have a greater impact on the habitat through their repeated use of areas unlike livestock were they are only in a area for short periods and are controlled.	All	Both	emc0389GB
30.	We have been unable to ascertain whether or not feral horse and burro populations are considered "invasive species." While litigation continues to hamper appropriate removal of excess horses and burros for sage grouse habitat, the detrimental impact of overpopulation must certainly be addressed. Funds expended to keep excess horses and burros in containment facilities would be far better invested in improving sage grouse habitat	All	Both	emc0396GB
31.	In addition to our previous comments, submitted 7 February 2012, we would like to bring attention to the apparent conflict between conservation of native greater sage-grouse ri"\ (Centrocercus urophasianus) and BLM's management of feral horses and burros	All	Both	emc0398GB
32.	Feral horses are an exotic species in North America. Exotic, or non-native, species are among the most widespread and serious threats to the integrity of native wildlife populations because of their potential to invade and degrade native ecosystems. Exotic plant and animal species present special challenges for wildlife managers because their impacts on the native biota are poorly understood by the general public, and many people regard them as a component of the natural ecosystem. As a result, some exotic species have advocacy groups that promote their continued presence in landscapes where they are not native, and few policies and laws deal directly with their control. Feral horses (Equus caballus) that roam freely across western North America are examples of such species: they are iconic and much-loved by some, but damage wildlife habitat and require constant management through population reduction activities.	All	Both	emc0398GB
33.	Herds of feral horses cause significant damage to the environment. Currently, estimates suggest that these herds, along with burros (E. asinus), range across more than 45 million acres in 10 states in the American west and 2 Canadian provinces	All	Both	emc0398GB
34.	Large herbivores (both native and non-native) can disturb landscapes by trampling soils and vegetation, selectively grazing and over utilizing palatable plants, and altering the distribution of nutrients in the ecosystem	All	Both	emc0398GB
35.	When horses are added to an ecosystem, little native habitat, from grassy plains to steeper rockier areas, is left undisturbed. Studies in the Great Basin have shown that areas inhabited by feral horses tend to have fewer plant species and less plant cover than areas without horses, as well as more invasive plant species such as cheatgrass, which itself is widely known as poor wildlife habitat	All	Both	emc0398GB
36.	Given the effects that feral horses can have on greater sage-grouse habitat, we are concerned about how BLM will integrate management of sage-grouse with management of feral horses. We encourage BLM to examine use by feral horses in sage-grouse habitat and take appropriate actions to ensure that feral horses do not further contribute to the decline in sage-grouse numbers.	All	BLM	emc0398GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
37.	Any analysis of feral horse management actions in priority sage-grouse habitat should include a thorough review of the possible direct and indirect effects on sage-grouse.	All	Both	emc0398GB
38.	Any herd Management Areas (HMAs) within or containing priority habitat should be kept below established Appropriate Management Levels (AML)	All	Both	emc0398GB
39.	While we understand that BLM has certain obligations, set by legislation, regarding the management of feral horses, such obligations should not take precedence over management and conservation of a native species, such as greater sage-grouse.	All	Both	emc0398GB
40.	NTT at 18, and IM at 7 regarding Wild Horses: BLM must evaluate AMLs for horses at the same time as it addresses livestock grazing permits. These must be based on balancing needs of horses for food, cover and space including natural band structure, and analyzing adverse impacts of livestock grazing disturbance on all aspects of the thriving natural ecological balance. This must be done fairly.	All	Both	emc0411GB
41.	We have been unable to ascertain whether or not feral horse and burro populations are considered "invasive species." While litigation continues to hamper appropriate removal of excess horses and burros for sage grouse habitat- the detrimental impact of overpopulation must certainly be addressed. Funds expended to keep excess horses and burros in containment facilities would be far better invested in improving. Bage grouse habitat	All	Both	fxc0006GB
42.	The EIS should identify if the presence of wild horses is one factor contributing to the decline of sage grouse populations. The fact that wild horses are not a native species should be addressed in the EIS. Wild Horses are utilizing (and competing for) the same habitat as sage grouse.	All	Both	rmc0035GB
43.	The Board finds the section on "Wild Horse and Burro Management" to be inadequate. For as much detail as was included in the "Range Management" section, there is very little in this section. Proper Range Management includes ALL large herbivores whether they are domestic stock, wildlife or wild horses and burros. The domestic stock is already highly regulated and the management of wild horses and burros should be held to the same standards! To hold wild horses and burros to a lesser or different standard is completely unacceptable.	All	Both	rmc0050GB
44.	In the list of preliminary issues, identified in the Federal Register Notice of Intent to Prepare Environmental Impact Statement, it is noteworthy that "Wild Horse and Burro Management" is not included as a preliminary issue. Perhaps because the BLM fails to meet its own obligations for appropriate management levels, this is not being considered as a matter for action. Almost as an afterthought in the Instruction Memorandum No. 2012-043, "Wild Horse and Burro Management" is covered very briefly, stating that Ongoing Authorizations/Activities will: • Manage wild horses and burro population levels within established Appropriate Management Levels (AML) • Wild Horse Herd Management Areas will receive priority for removal of excess horses • Wild horses and burros remaining in Herd Management Areas where the AML has been established as zero will receive priority for removal • When developing overall workload priorities for the upcoming year, prioritize horse gathers except where removals are necessary in non-PPH to prevent catastrophic herd health and ecological impacts. Beyond the details associated with managing horses at their appropriate management levels, there also needs to be consideration given to the impact of wild horses and burros on designated Sage-Grouse habitat. In those cases where, on-the-ground substantiation points to wild horses and burros being issues in the condition of Sage-Grouse habitat, actions should be instituted immediately to deal with the damage. In the short term, reductions should be made and for the long term, appropriate management levels should be adjusted to take into account the inability for these critical resources to sustain the impacts caused by wild horses	All	Both	rmc0058GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	and burros. Given the actual performance record of BLM in Nevada and the exceedingly over-abundance and out-ofcontrol numbers, how will the actual correction be brought about? Beyond excuses for not having enough resources, what confidence can there be that BLM will not continue to practice the management process of "do as we say - not as we do "?			
45.	Special attention needs to be given in the Sage-grouse priority areas overlapping Herd Management Areas for feral horses that are protected by law.	CO	Both	emc0178RM
46.	All of the discussion of wild horses in the Technical Team Report omits the important facts regarding wild horse use of sage grouse habitat. They graze the rangelands year-long. Wild horses not only use the riparian areas heavily but they aggressively defend the water sources against wildlife. Their numbers increase by 18% to 23% a year. They trail in such a way that they leave permanent routes with the attendant impacts on soils and vegetation and water quality due to increased erosion from runoff. BLM, with the approval of the Interior Secretary, continues to promote wild horse sanctuaries on public lands. The sanctuaries are a central element in the national strategy adopted in 2011. The creation of sanctuaries, such as the one proposed in Nevada, will destroy sage grouse habitat since they are not subject to gathers or other management limits. As is documented in the Sheldon Wildlife Refuge, where grazing ended 17 years ago, ungathered wild horse populations damage wildlife habitat and vegetation. A wild horse sanctuary in lieu of managed cattle will have far greater impacts on rangeland resource vegetation, soils, and by extension sage brush habitat. The failure of the IM to address these policy conflicts is manifest. The EIS must do so. The BLM national wild horse strategy also reduced the number of wild horse gathers for the next several years. The cut in wild horse gathers comes at a time when few if any wild horse herd management areas are within their appropriate management levels (AMLs). BLM's failure to manage for AML since 1971 when Congress adopted the Wild Horse Act is well-documented as are the adverse impacts of too many wild horses on rangeland resources. The cumulative impact of the failure to consistently manage to AML must be calculated over the 40 years that the Wild Horse Act has been in effect. Thus, this BLM policy continues the documented damage to rangeland resources and any management of habitat for sage grouse must disclose and resolve the contradictory policies being pursued.	East	Both	emc0155rm
47.	We have been unable to ascertain whether or not feral horse and burro populations are considered "invasive species." While litigation continues to hamper appropriate removal of excess horses and burros for sage grouse habitat, the detrimental impact of overpopulation must certainly be addressed. Funds expended to keep excess horses and burros in containment facilities would be far better invested in improving sage grouse habitat.	GB	Both	rmc0056GB
48.	It is bewildering that the BLM's technical specialists consider domestic livestock a potential threat for trampling nests but not wild horses. In this respect, all four-legged, hooved animals, should be treated somewhat equal until documented otherwise.	GB	Both	rmc0076gb
49.	wild horse and burro management: Where wild horses and burros exist in Nevada and eastern California, they can impact Sage Grouse and its habitat by excessive numbers and resulting degradation of sagebrush habitats. To our knowledge, the agencies do not currently consider these adverse impacts to Sage Grouse and its habitats in setting numbers or in designating or managing use areas or in selecting gather sites. The EIS should incorporate conservation measures for Sage Grouse in the agencies' wild horse and burro program. A. the agencies must consider Sage Grouse habitat requirements in setting Allowable Management Levels (AMLs) and Herd Management Areas (HMAs). B. the agencies should prioritize land health assessments in each HMA with priority Sage Grouse habitat and develop quantifiable vegetation objectives to meet habitat requirements. C. the agencies should amend AMLs and HMA management plans to meet specific Sage Grouse population	NVCA	Both	emc0283GB

Table C-16
Comments Related to Wild Horses and Burros

Comment No.	Comment	SubRegion ID	Agency	CmtLtrCode
	objectives and to meet specific habitat requirements in priority habitats. D. the agencies should prevent grazing by wild horses and burros of burned areas until vegetation recovery objectives have been met			
50.	In the NTT document, livestock grazing is considered to be a diffuse disturbance (pressure is exerted over broad spatial or temporal scales). Livestock grazing, as well as wild horse and burro activity can greatly affect nest success on any ground-nesting bird as well as decimate any viable vegetation in the grazing area. Wild horse numbers have increased exponentially in the Rochester area and no gatherings have occurred to decrease population size. Since wild horses have different grazing patterns then cattle the magnitude of grazing increases across the entire landscape in the Rochester area. Damage to vegetation communities (i.e. reduction of grass, shrub, and forb cover and increases in unpalatable forbs and exotic plants as well as complete decimation of any vegetation community) is highly visible in the Limerick and Rochester canyon areas. If any mitigation efforts were made in or adjacent to Rochester mine's project area wild horses and cattle would have to be fenced out for any type of habitat restoration or sage grouse re-introduction to have a chance.	NVCA	Both	emc0302GB
51.	The Association would like to also address the management of wild horses and burros most especially in areas of critical habitat. The impacts from over populations of wild horses to rangelands and lack of compliance of Appropriate Management Levels (AML) by the BLM have had impacts on greater sagegrouse habitat. Further clarification should be brought to the agencies' policies regarding greater sagegrouse conservation efforts and wild horse and burro management. IM 2012-043 states that BLM is directed to manage wild horses and burros within appropriate management Levels (AML) and that excess horses and burros are to be removed. Currently, this is not the management strategy employed and the Association feels that this inconsistency needs to be resolved or it needs to be clarified before any greater sage-grouse conservations measures can be defined.	NVCA	Both	emc0328GB
52.	Prioritize gathers in priority sage-grouse habitat, unless removals are necessary in other areas to prevent catastrophic environmental issues, including herd health impacts. Will this measure be evaluated for an entire Herd Management Area (HMA) or will it address specific habitat requirements for greater sage-grouse? The Association believes that additional clarification of this statement is needed to address habitat requirements for greater sage-grouse.	NVCA	Both	emc0328GB
53.	Since the tum of the century the area has been grazed by cattle and wild horses and burros. The wild horse and burro population got out of control in the 80's and 90's but by that time most of the sage hen were gone.	NVCA	Both	rmc0044GB

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