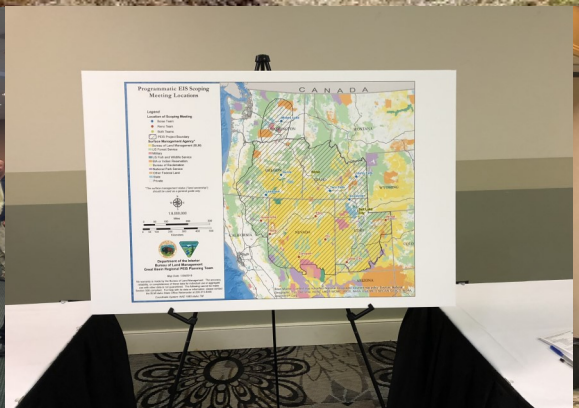
U.S. Department of the Interior

BUREAU OF LAND MANAGEMENT

May 2018

Programmatic EISs for Fuel Breaks and Fuels Reduction and Restoration in the Great Basin

Scoping Report



The Bureau of Land Management's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

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ACRONYMS AND ABBREVIATIONS

	Full Phrase
ARMPA	approved resource management plan amendment
BLM	United States Department of the Interior, Bureau of Land Management
CFR	Code of Federal Regulations
DOI	United States Department of the Interior
EIS	environmental impact statement
FIAT	Fire and Invasives Assessment Tool
NEPA	National Environmental Policy Act of 1969
NHT	National Historic Trail
NOI	Notice of Intent
NRCS	Natural Resources Conservation Service
OHV	off-highway vehicle
PEIS	programmatic environmental impact statement
RMP	resource management plan
ROD	Record of Decision

CHAPTER 1
INTRODUCTION

1.1 BACKGROUND

The United States (US) Department of the Interior (DOI), Bureau of Land Management (BLM), as lead agency, is preparing two regionally focused, landscape-scale, programmatic environmental impact statements (PEISs) in accordance with the National Environmental Policy Act (NEPA). One PEIS will focus on fuel breaks, while the other will focus on hazardous fuels reduction and rangeland restoration. The PEISs will evaluate conditions under which a comprehensive system of fuel breaks, hazardous fuels reduction, and rangeland restoration tools and techniques could be implemented within the Great Basin region to protect and restore the sagebrush steppe ecosystem, thereby benefitting users of this ecosystem. The project area includes portions of California, Idaho, Nevada, Oregon, Utah, and Washington.

The BLM is proposing to construct a system of fuel breaks across the Great Basin to further protect life and property as well as to sustain its multiple-use public lands. These fuel breaks would provide a proactive approach by which the BLM could reduce the number of acres burned annually, decrease loss of life and property, increase multiple-use opportunities, and protect habitat. The BLM is also proposing hazardous fuels reduction and rangeland restoration to protect and conserve the sagebrush steppe ecosystem so that it is capable of delivering sustainable goods and services, such as healthy rangelands, clean water, and recreational opportunities, while at the same time conserving and protecting wildlife and their natural surroundings.

Large-scale wildfires, particularly in sagebrush steppe ecosystems, have increased exponentially throughout the west in recent years. These large-scale fires have resulted in increased costs, injuries, and fatalities within the firefighting community, as well as destruction of private property, habitat loss for a variety of species, and subsequent loss of beneficial uses of those lands for many years post-fire. While fire is an important part of the ecology of sagebrush steppe

habitats, frequent large-scale wildfires are a leading cause of sagebrush loss and increasing spread of annual invasive grasses, primarily cheatgrass. Additionally, encroachment of pinyon-juniper into sagebrush steppe habitats has further reduced the quality and functionality of the sagebrush steppe ecosystem. Appropriately installed and maintained fuel breaks and strategic hazardous fuels reduction would reduce vegetation continuity and aid in suppression opportunities, thereby reducing risks to firefighters, decreasing fire size and acres burned annually, improving or restoring the ecosystem, and protecting BLM's rangeland restoration investments, leading to a sustained and economically viable ecosystem.

The PEISs would aid in meeting provisions of the Federal Land Policy and Management Act and the objectives and goals as outlined in the relevant land use plans; the Greater Sage-Grouse Wildfire, Invasive Annual Grasses, and Conifer Expansion Assessments; and Secretarial Order 3336 (Rangeland Fire Prevention, Management and Restoration). In accordance with the NEPA, the BLM will seek public and interagency input to identify issues to address in the PEISs and coordinate with other federal, tribal, state, and local government agencies in preparing the PEISs.

The BLM published a Notice of Intent (NOI) in the *Federal Register* on December 22, 2017, announcing the beginning of a scoping period to solicit public comments and identify issues. The comment period ended on March 2, 2018. The BLM has continued to accept comments beyond this date, but they are not included in this report. This report describes the scoping process and summarizes the comments received during the comment period.

1.2 PURPOSE AND NEED FOR PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENTS

The PEISs would expedite the development, enhancement, maintenance, and utilization of fuel breaks, fuels reduction, and rangeland restoration for the protection, recovery, and conservation of habitats in the Great Basin region. The projects would reduce the threat of habitat loss from fires and restore habitat to maintain the rangeland's health and functionality.

Fuel breaks act as fire-anchor points and firefighter staging areas; provide protection of ongoing and pending habitat restoration projects; and assist in quicker and earlier fire suppression response times, thereby reducing wildfire risk, aiding in the protection of human life and property, protecting taxpayer investment in habitat restoration projects, and improving western landscapes by offering multiple-use opportunities. Hazardous fuels reduction and restoration projects would replace invasive species with native habitat, decrease the continuous cover of annual grasses that fuel large wildfires, and reduce areas of conifer encroachment.

Large-scale wildfires have increased significantly throughout the west in recent years, particularly in sagebrush-steppe ecosystems, resulting in the widespread loss of sagebrush-steppe vegetation. These wildfires are largely a result of

continuous fuel loading caused by widespread increases in invasive annual grasses. In the last decade, fires have exceeded 100,000 acres on a regular basis, and the number of areas that burn again before habitat can re-establish has increased. These large-scale wildfires, with very high to extreme burning conditions, have resulted in increased numbers of injuries and fatalities among wildland firefighters and increased destruction of private property and habitat loss for a variety of species.

Wildfires have resulted in widespread impacts on the quality of healthy sage-steppe landscapes and have hampered the BLM's ability to maintain productive lands. These large-scale, repeated wildfires facilitate the spread of invasive annual grasses, further reducing rangeland quality and availability and increasing the threat of repeat fires. These factors adversely affect sagebrush recovery rates or, in some instances, prevent recovery altogether.

In warm, dry settings, sagebrush-steppe usually takes, at a minimum, many decades to recover, even where invasive annual grasses or other invasive plant species do not become dominant. Invasive species and conifer encroachment can be exacerbated as a result of wildfires in sagebrush ecosystems, resulting in an increased risk of wildfires (positive feedback loop).

By compartmentalizing desirable vegetation and providing safer access for firefighters, fuel breaks aid in decreasing potential habitat loss from wildfires, protecting habitat restoration areas, and combatting the spread of invasive species (i.e., decreasing or eliminating this positive feedback loop). By restoring native habitat, invasive species that help to fuel these large fires will be reduced or removed, making the rangelands more resistant to future wildfires.

The PEISs, once implemented, will provide for increased firefighter safety. They will also assist in the maintenance, protection, and restoration of the iconic western sagebrush landscape.

The PEISs will provide a mechanism for the BLM to streamline any future NEPA processes pertaining to fuel breaks, fuels reduction, and rangeland restoration proposals in the Great Basin region (**Figure 1-1**).

1.3 OVERVIEW OF THE SCOPING PROCESS AND SCOPING REPORT

Public involvement is a vital and legally required component of the planning process. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 Code of Federal Regulation (CFR) 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the NEPA process.

Scoping is an early and open process that helps the BLM determine the scope of issues to be addressed and identify significant issues related to a proposed

action. Information collected during scoping may also be used to develop the alternatives to be addressed in a NEPA document.

In accordance with 43 CFR 1610.2(d), the BLM must document the public scoping results. This scoping report summarizes the scoping process and the comments received during the formal scoping period.

1.4 DESCRIPTION OF THE SCOPING PROCESS

As required by NEPA and its public involvement guidance, the BLM solicits comments from relevant agencies and the public, then organizes and analyzes all comments received. Then the agency evaluates the position statement of each comment and extracts the overarching issue that will be addressed during the planning process. These issues define the scope of analysis for the PEISs and are used to develop the project alternatives.

1.4.1 Notice of Intent

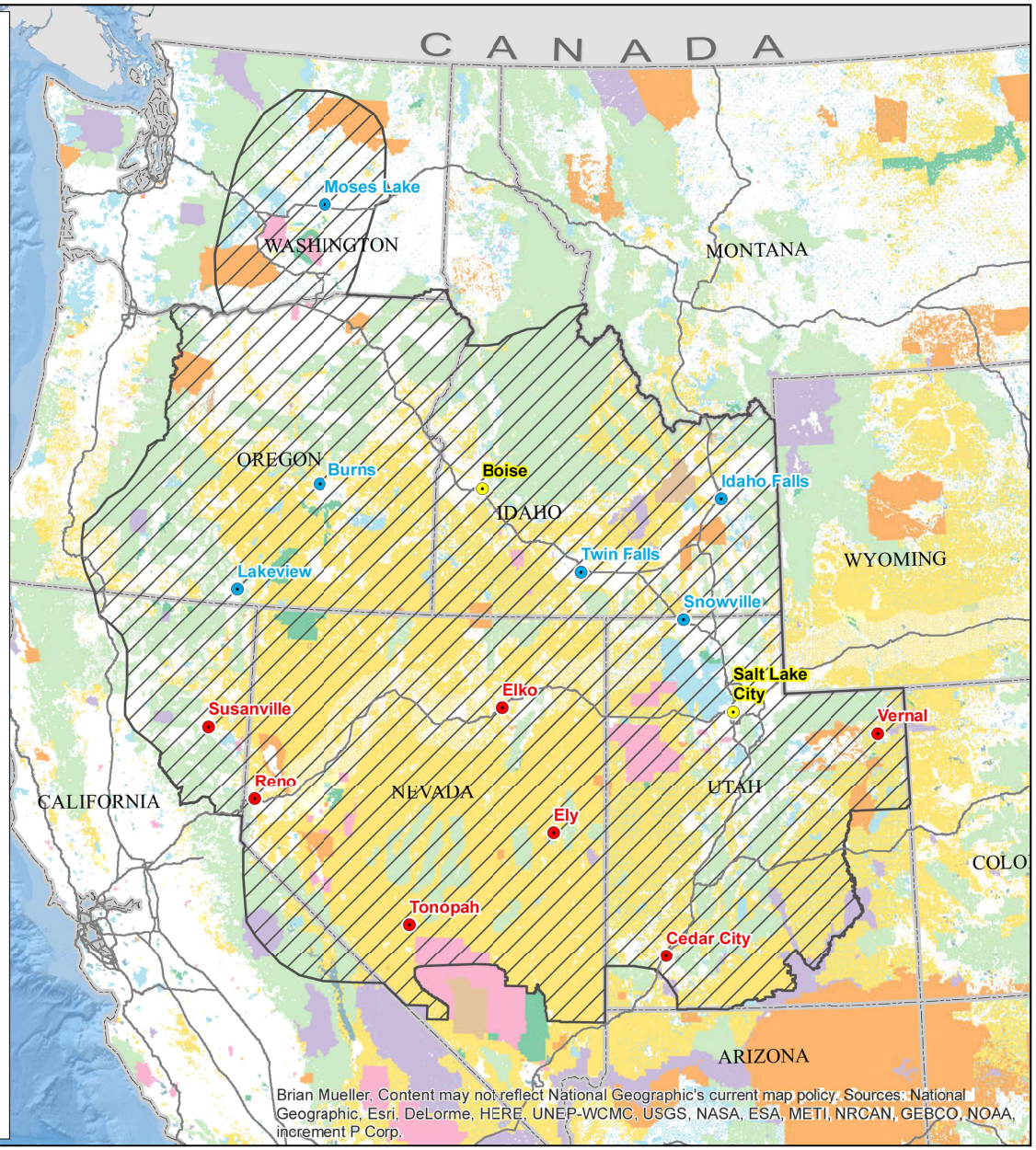
As defined under NEPA, the scoping period began with the publication of the NOI, titled "Notice of Intent to Prepare Two Great Basin-Wide Programmatic Environmental Impact Statements to Reduce the Threat of Wildfire and Support Rangeland Productivity," in the *Federal Register* on December 22, 2017.

The NOI initiated the public scoping process for the two PEISs. During this period, the BLM sought public comments to determine relevant issues that could influence the scope of the environmental analysis, including alternatives, and guide the process for developing the PEISs. The official comment period ended on March 2, 2018.

In the NOI, the BLM identified the following preliminary issues:

1. Fuel break construction and associated road improvement for firefighter access could increase human activity in remote areas, introduce noxious and invasive weeds, and increase the incidence of human-caused wildfires.
2. Fuel break construction could remove or alter sagebrush habitat, rendering it unusable for some species.
3. Fuel break construction on either side of existing roads may create movement barriers to small-sized wildlife species by reducing hiding cover.
4. Fuel break construction in highly resistant, and resilient habitats may not be necessary because those sites are less likely to burn or will respond favorably to natural regeneration.
5. After habitat restoration treatments, historical uses, such as livestock grazing and recreation, may be temporarily halted until the treatment becomes established and objectives are met.

Programmatic EIS Scoping Meeting Locations



Legend

Location of Scoping Meeting

- Boise Team
- Reno Team
- Both Teams
- PEIS Project Boundary

Surface Management Agency*

- Bureau of Land Management (BLM)
- US Forest Service
- Military
- US Fish and Wildlife Service
- BIA or Indian Reservation
- Bureau of Reclamation
- National Park Service
- Other Federal Land
- State
- Private

**The surface management status ("land ownership") should be used as a general guide only.*

N W E S

1:8,000,000

Miles

0 50 100 200 300

0 50 100 200 300 400 500

Kilometers

Department of the Interior
Bureau of Land Management
Great Basin Regional PEIS Planning Team

Map Date: 1/26/2018

No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed. The following cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office Webmaster at 208-373-4000.

Coordinate System: NAD 1983 Idaho TM

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6. Fuel reduction treatments in pinyon-juniper woodlands could disrupt traditional tribal use of these sites.
7. The use of nonnative species in fuel breaks could affect listed species and affect species composition in adjacent native plant communities.

1.4.2 Project Website

The BLM maintains a project website with information related to the development of the two PEISs: https://go.usa.gov/xnQcG. The website includes background documents, maps, information on public meetings, and contact information.

1.4.3 Public Scoping Meetings

Fifteen public scoping meetings were held throughout the project area. These scoping meetings were held in a mixed format to encourage participants to discuss concerns and questions with the BLM and other agency representatives. The meetings began with a powerpoint presentation describing the purpose of the PEISs, project approach, and opportunities for public involvement. Following the presentation, the meetings transitioned into an open house format, where the public could view project materials, maps, and discuss the project with BLM staff. Copies of scoping information and blank scoping comment forms were available at the meetings. The dates and locations of the open houses are provided in **Table 1-1**.

Table 1-1
Scoping Open Houses in 2018

Location	Date	Venue
California		
Susanville	6 February 2018	BLM Eagle Lake Field Office 2550 Riverside Drive Susanville, CA 96130
Idaho		
Boise	30 January 2018	Wyndham Garden Boise Airport 3300 South Vista Avenue Boise, ID 83705
Twin Falls	13 February 2018	Canyon Springs Red Lion Inn 1357 Blue Lakes Boulevard Twin Falls, ID 83301
Idaho Falls	14 February 2018	Hilton Garden Inn 700 Lindsay Boulevard Idaho Falls, ID 83402
Nevada		
Reno	7 February 2018	UNR – Crowley Student Union, Milt Glick Ballroom C 1664 North Virginia Street Reno, NV 89503

Table 1-1
Scoping Open Houses in 2018

Location	Date	Venue
Elko	8 February 2018	Red Lion Hotel, High Desert Inn Ballroom 2065 Idaho Street Elko, NV 89801
Ely	13 February 2018	Bristlecone Convention Center 150 Sixth Street Ely, NV 89301
Tonopah	15 February 2018	Tonopah Convention Center 301 Brougher Avenue Tonopah, NV 89049
Oregon		
Lakeview	7 February 2018	BLM Lakeview District Interagency Office 1301 South G Street Lakeview, OR 97630
Burns	8 February 2018	Harney County Chamber of Commerce/Community Center 484 North Broadway Burns, OR 97720
Utah		
Snowville	31 January 2018	Snowville Elementary School 160 North Stone Road Snowville, UT 84336
Salt Lake City	15 February 2018	Courtyard by Marriott Downtown 345 West 100 South Salt Lake City, UT 84101
Cedar City	14 February 2018	Heritage Center – Festival Hall 105 North 100 East Cedar City, UT 84720
Vernal	1 February 2018	Uintah Conference Center 313 East 200 South Vernal, UT 84078
Washington		
Moses Lake	1 February 2018	Moses Lake Best Western 3000 West Marina Drive Moses Lake, WA 98837

1.5 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received on or before March 2, 2018, were evaluated and are documented in this scoping summary report.

The BLM received 98 unique written submissions during the public scoping period, comprising 1,484 substantive comments. The most common method used to submit comments was email; comments were also submitted at public scoping meetings, via the project website, or via standard mail.

It is important to note that analyzing identical comments as a group does not reduce the importance of the comment. The NEPA regulations on scoping are clear that the scoping process is not a vote, but an opportunity to "determine the scope and the significant issues to be analyzed in depth in the environmental impact statement" (40 CFR 1501.7[a][2]) and to "identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review" (40 CFR 1501.7[a][3]).

Table 1-2 provides information on the affiliation of commenters. Most comments were received by individuals (40.8 percent), followed by organizations (34.7 percent).

Table 1-2
Submissions by Affiliation[1]

Affiliation	Number of Submissions	Percentage of Total Submissions
Business/Commercial Sector	1	1.0
Educational Institution	1	1.0
Federal Government Agency	5	5.1
Individual	40	40.8
Local Government Agency	9	9.2
Organization (nonprofit, citizen's group)	34	34.7
State Government Agency	8	8.2
Total	**98**	**100**

[1]Calculations do not include form letters or petition signatories. All numbers are approximate.

Table 1-3, below, provides information on the location of commenters, based on the address provided with the submission. If no address was provided, the location of the submission was classified as "Unknown."

Table 1-3
Submissions by Geographic Area[1]

Location	Number of Submissions	Percentage of Total Submissions
California	6	6.1
Colorado	1	1.0
Washington, DC	1	1.0
Idaho	13	13.3
Montana	2	2.0
Nevada	25	25.5
Oregon	5	5.1
Utah	13	13.3
Washington	1	1.0
Unknown	31	31.6
Total	**98**	**100**

[1]Calculations do not include form letters or petition signatories. All numbers are approximate.

To ensure that public comments were properly registered and that none were overlooked, the BLM used a multiphase management and tracking system. Written submissions were given a unique identifier and were logged into the system. Each submission was then reviewed, and individual comments were extracted.

Each substantive comment was reviewed to determine if it pertained to an issue that will be resolved though the current project and assigned to one of four classifications as follows:

1. General comments applicable to both the Fuel Breaks PEIS and the Fuels Reduction and Rangeland Restoration PEIS
2. Comments related specifically to the Fuel Breaks PEIS
3. Comments related specifically to the Fuels Reduction and Rangeland Restoration PEIS
4. Issues that are beyond the scope of the project

All comments within categories 1–3 were further classified by commenter affiliation, geographical area, process category, and issue category, as described in Chapter 2, Comment Summary. Comments were next entered into the Public Input and Comment Tracking database for analysis.

The results of the comment analysis are described in **Chapter 2**, Comment Summary.

CHAPTER 2
COMMENT SUMMARY

2.1 COMMENTS APPLICABLE TO BOTH PEISS

The comment analysis for general comments includes comments applicable to both the Fuel Breaks PEIS and the Fuels Reduction and Rangeland Restoration PEIS and comments that did not specify which PEIS they pertained to. General comments comprised 65 percent of the total comments.

2.1.1 Commenters by Affiliation

All submissions received were categorized by affiliation of the commenter. **Table 2-1** below shows the number and proportion of commenters by affiliation. Letters on business, agency, or organization letterhead or letters where the commenter signed using an official agency title were considered to represent that organization or agency. All other letters were considered to represent individuals. In addition, some commenters made multiple submissions, and some letters had more than one signatory; therefore, the total for commenters by affiliation is not equal to the total letter submissions.

Table 2-1
General Comments—Submissions by Affiliation

Affiliation	Number of Commenters	Percentage of Total Commenters
Business/Commercial Sector	1	1.2
Educational Institution	1	1.2
Federal Government Agency	5	5.8
Individuals	33	38.4
Local Government Agency	9	10.5
Organization (nonprofit, citizen's group)	31	36.0
State Government Agency	6	7.0
Total	**86**	**100**

2.1.2 Commenters by Geographical Area

Table 2-2 below shows the number and proportion of commenters by geographic location. In addition, some commenters made multiple submissions, and some letters had more than one signatory; therefore, the total for commenters by geographic area is not equal to the total letter submissions.

Table 2-2
General Comments—Submissions by Geographic Area[1]

Location	Number of Commenters	Percentage of Total Commenters
California	6	7.0
Colorado	1	1.2
Washington, DC	1	1.2
Idaho	13	15.1
Montana	2	2.3
Nevada	23	26.7
Oregon	4	4.7
Utah	12	14
Unknown	24	27.9
Total	**86**	**100**

[1]Calculations do not include form letters.

2.1.3 Number of Comments by Issue Category

Table 2-3 below shows the number and proportion of comments received by issue category. The 962 general comments were categorized into 15 issue categories. **Chapter 3**, Issue Summary, provides a detailed analysis of the comments received for each issue category.

Table 2-3
General Comments—Number of Individual Comments by Issue Category

Issue Category	Number of Individual Comments	Percentage of Total
Adaptive Management and Monitoring	13	1.4
Alternatives	36	3.7
Economics	9	0.9
Data and Science	161	16.7
Request for Comment Period Extension	1	0.1
Fire and Invasives Assessment Tool (FIAT) Assessments	10	1.0
Impacts: Direct, Indirect, and Cumulative	50	5.2
Out of Scope	44	4.6
Purpose and Need	74	7.7
Post-Fire Restoration and Maintenance	6	0.6

Table 2-3
General Comments—Number of Individual Comments by Issue Category

Issue Category	Number of Individual Comments	Percentage of Total
Process: Public Outreach	19	2.0
Process: Regulation, Law, and Policy	13	1.4
Relationship with Other State or Local Policy	25	2.6
Resources and Resource Uses[1]	488	50.7
Other[2]	13	1.4
Total	**962**	**100**

[1]Further breakdown of resources and resource uses is provided in **Table 2-4.**
[2]Includes requests for cooperating agency status and changes to the mailing list

Comments pertaining to resources and resource uses (488) were further categorized based on the specific resource or resource use. The number of comments by specific resource or resource use is shown in **Table 2-4**.

Table 2-4
General Comments—Resource-Specific Comments

Issue Category	Number of Individual Comments	Percentage of Total
Air Quality	2	0.4
Livestock Grazing	116	23.8
Cultural Resources	15	3.1
Fish and Wildlife	28	5.7
Water Resources	26	5.3
Lands and Realty	2	0.4
Public Health and Safety	1	0.2
Recreation	7	1.4
Socioeconomics and Environmental Justice	8	1.6
Soil Resources	20	4.1
Special Designations	13	2.7
Special Status Species	45	9.2
Travel Management	9	1.8
Tribal Interests	4	0.8
Vegetation Resources	122	25.0
Visual Resource Management	3	0.6
Wildland Fire Management	45	9.2
Wild Horses and Burros	10	2.0
Lands with Wilderness Characteristics	1	0.2
Forestry and Woodland Products	11	2.3
Total	488	100

2.2 COMMENTS APPLICABLE TO FUEL BREAKS PEIS

The analysis of comments applicable to only the Fuel Breaks PEIS is presented in this section. There were 306 comments on the Fuel Breaks PEIS, comprising 21 percent of the total comments.

2.2.1 Submissions by Affiliation

All submissions received and pertaining to the Fuel Breaks PEIS were categorized by affiliation of the commenter. **Table 2-5** below shows the number and proportion of commenters by affiliation. Letters on business, agency, or organization letterhead or letters where the commenter signed using an official agency title were considered to represent that organization or agency. All other letters were considered to represent individuals. Note that these calculations do not include submissions of form letters. In addition, some commenters made multiple submissions, and some letters had more than one signatory; therefore, the total for commenters by affiliation is not equal to the total letter submissions.

Table 2-5
Fuel Breaks Comments—Submissions by Affiliation

Affiliation	Number of Commenters	Percentage of Total Fuel Breaks Commenters
Business/Commercial Sector	0	0.0
Educational Institution	1	2.0
Federal Government Agency	2	3.9
Individuals	17	33.3
Local Government Agency	5	9.8
Organization (nonprofit, citizen's group)	20	39.2
State Government Agency	6	11.8
Total	**51**	**100**

2.2.2 Commenters by Geographical Area

Table 2-6 below shows the number and proportion of commenters by geographic location. Note that these calculations do not include submissions of form letters. In addition, some commenters made multiple submissions, and some letters had more than one signatory; therefore, the total for commenters by geographic area is not equal to the total letter submissions.

Table 2-6
Fuel Breaks Comments—Submissions by Geographic Area

Location	Number of Commenters	Percentage of Total Fuel Breaks Commenters
California	1	2.0
Colorado	1	2.0
Washington, DC	1	2.0
Idaho	11	21.6
Montana	2	3.9
Nevada	14	27.5
Oregon	3	5.9
Utah	3	5.9
Washington	1	2.0
Unknown	14	27.5
Total	**51**	**100**

2.2.3 Number of Comments by Issue Category

Table 2-7 below shows the number and proportion of comments received by issue category. The 306 comments pertaining to the Fuel Breaks PEIS were categorized into 15 issue categories. **Chapter 3**, Issue Summary, provides a detailed analysis of the comments received for each issue category.

Table 2-7
Fuel Breaks Comments—Number of Individual Comments by Issue Category

Issue Category	Number of Individual Comments	Percentage of Total
Adaptive Management and Monitoring	2	0.7
Alternatives	8	2.6
Economics	15	4.9
Data and Science	28	9.2
Request for Comment Period Extension	0	0.0
FIAT Assessments	2	0.7
Impacts: Direct, Indirect, and Cumulative	17	5.6
Out of Scope	10	3.3
Purpose and Need	5	1.6
Post-Fire Restoration and Maintenance	8	2.6
Process: Public Outreach	3	1.0
Process: Regulation, Law, and Policy	1	0.3
Relationship with Other State or Local Policy	8	2.6
Resources and Resource Uses[1]	199	65.0
Other	0	0.0
Total	**306**	**100**

[1]Further breakdown of resources and resource uses is provided in **Table 2-8.**

Comments pertaining to resources and resource uses were further categorized based on the specific resource or resource use. The number of comments by specific resource or resource use is shown in **Table 2-8**.

Table 2-8
Fuel Breaks Comments—Resource-Specific Comments

Issue Category	Number of Individual Comments	Percentage of Total
Air Quality	0	0.0
Livestock Grazing	6	3.0
Cultural Resources	2	1.0
Fish and Wildlife	16	8.0
Water Resources	5	2.5
Lands and Realty	3	1.5
Public Health and Safety	0	0.0
Recreation	4	2.0
Socioeconomics and Environmental Justice	0	0.0
Soil Resources	2	1.0
Special Designations	3	1.5
Special Status Species	18	9.0
Travel Management	16	8.0
Tribal Interests	0	0.0
Vegetation Resources	68	34.2
Visual Resource Management	2	1.0
Wildland Fire Management	49	24.6
Wild Horses and Burros	0	0.0
Lands with Wilderness Characteristics	5	2.5
Forestry and Woodland Products	0	0.0
Total	**199**	**100**

2.3 COMMENTS APPLICABLE TO FUELS REDUCTION AND RANGELAND RESTORATION PEIS

The analysis of comments applicable to only the Fuels Reduction and Rangeland Restoration PEIS is presented in this section. There were 218 comments on the Fuels Reduction and Rangeland Restoration PEIS, comprising 15 percent of the total comments.

2.3.1 Commenters by Affiliation

All submissions received and pertaining to the Fuels Reduction and Rangeland Restoration PEIS were categorized by affiliation of the commenter. **Table 2-9** below shows the number and proportion of commenters by affiliation. Letters on business, agency, or organization letterhead or letters where the commenter signed using an official agency title were considered to represent that

Table 2-9
Fuels Reduction and Rangeland Restoration Comments—Submissions by Affiliation

Affiliation	Number of Commenters	Percentage of Total Fuels Reduction and Rangeland Restoration Commenters
Business/Commercial Sector	0	0.0
Educational Institution	0	0.0
Federal Government Agency	0	0.0
Individuals	19	43.2
Local Government Agency	6	13.6
Organization (nonprofit, citizen's group)	16	36.4
State Government Agency	3	6.8
Total	**44**	**100**

organization or agency. All other letters were considered to represent individuals. Note that these calculations do not include submissions of form letters. In addition, some commenters made multiple submissions, and some letters had more than one signatory; therefore, the total for commenters by affiliation is not equal to the total letter submissions.

2.3.2 Commenters by Geographical Area

Table 2-10 below shows the number and proportion of commenters by their geographic location. Note that these calculations do not include submissions of form letters. In addition, some commenters made multiple submissions, and some letters had more than one signatory; therefore, the total for commenters by geographic area is not equal to the total letter submissions.

Table 2-10
Fuels Reduction and Rangeland Restoration Comments—Submissions by Geographic Area

Location	Number of Commenters	Percentage of Total Fuels Reduction and Rangeland Restoration Commenters
California	2	4.5
Colorado	1	2.3
Washington, DC	1	2.3
Idaho	7	15.9
Montana	1	2.3
Nevada	13	29.5
Oregon	1	2.3
Utah	5	11.4
Washington	0	0.0
Unknown	13	29.5
Total	**44**	**100**

2.3.3 Number of Comments by Issue Category

Table 2-11 below shows the number and proportion of comments received by issue category. The 218 comments pertaining to the Fuels Reduction and Rangeland Restoration PEIS were categorized into 15 issue categories. **Chapter 3**, Issue Summary, provides a detailed analysis of the comments received for each issue category.

Table 2-11
Fuels Reduction and Rangeland Restoration Comments—Number of Individual Comments by Issue Category

Issue Category	Number of Individual Comments	Percentage of Total
Adaptive Management and Monitoring	0	0.0
Alternatives	8	3.7
Economics	2	0.9
Data and Science	33	15.1
Request for Comment Period Extension	0	0.0
FIAT Assessments	1	0.5
Impacts: Direct, Indirect, and Cumulative	6	2.8
Out of Scope	21	9.6
Purpose and Need	6	2.8
Post-Fire Restoration and Maintenance	2	0.9
Process: Public Outreach	1	0.5
Process: Regulation, Law, and Policy	2	0.9
Relationship with Other State or Local Policy	0	0.0
Resources and Resource Uses	136	62.4
Other	0	0.0
Total	**218**	**100**

[1]Further breakdown of resources and resource uses is provided in **Table 2-12.**

Comments pertaining to resources and resource uses were further categorized based on the specific resource or resource use. The number of comments by specific resources or resource uses is shown in **Table 2-12**.

Table 2-12
Fuels Reduction and Rangeland Restoration Comments—Resource-specific Comments

Issue Category	Number of Individual Comments	Percentage of Total
Air Quality	0	0.0
Livestock Grazing	14	10.3
Cultural Resources	1	0.7
Fish and Wildlife	2	1.5

Table 2-12
Fuels Reduction and Rangeland Restoration Comments—Resource-specific Comments

Issue Category	Number of Individual Comments	Percentage of Total
Water Resources	7	5.1
Lands and Realty	0	0.0
Public Health and Safety	0	0.0
Recreation	0	0.0
Socioeconomics and Environmental Justice	1	0.7
Soil Resources	2	1.5
Special Designations	1	0.7
Special Status Species	6	4.4
Travel Management	1	0.7
Tribal Interests	0	0.0
Vegetation Resources	70	51.5
Visual Resource Management	0	0.0
Wildland Fire Management	20	14.7
Wild Horses and Burros	7	5.1
Lands with Wilderness Characteristics	0	0.0
Forestry and Woodland Products	4	2.9
Total	**136**	**100**

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CHAPTER 3
ISSUE STATEMENTS AND COMMENT SUMMARIES

For the purpose of BLM NEPA analysis, an "issue" is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. An issue is more than just a position statement, such as disagreement with grazing on public lands. The BLM will use the issues and other information collected in the early planning and scoping phases to help formulate a reasonable range of alternative management strategies that will be analyzed during the PEIS process.

The issue statements presented below are preliminary and are based on the best information known to date. Issues are separated by whether they apply to both PEISs or only the Fuel Breaks PEIS or Fuels Reduction and Rangeland Restoration PEIS. The BLM also has developed a summary of the comments received that apply to each issue.

After each issue and comment summary, the BLM has provided a description of how the issue will be considered during the PEIS process, such as where the issue will be addressed in the PEIS. For all issues, the BLM will comply with existing laws, regulations, guidance, and plans, including direction provided in resource management plans (RMPs) and the Greater Sage-Grouse Approved Resource Management Plan Amendments (ARMPAs), as applicable.

A number of comments were identified that were either out of the scope of this effort or would be addressed during tiered NEPA efforts at the site-specific level. Examples of out of scope comments are as follows:

- Changes to permitted grazing—The BLM will not be changing grazing permits through these PEISs; such changes would require land use plan amendments.
- Changes to wild horse and burro management—The BLM will not be changing wild horse and burro management through these PEISs; such changes would require land use plan amendments.

- Concerns related to deforestation—Given the nature of rangelands and that limited work would be conducted in forested areas, the BLM does not consider deforestation a concern for these PEISs.
- Questions regarding funding sources—Implementation funding is not required before the NEPA analysis begins. The PEISs will not include any mandatory elements that could not be met, given existing funding. In the PEISs, the BLM will analyze the impacts of fuels treatment activities, allowing it to meet its environmental compliance requirements and to establish a fuels management framework that can be used as future funding becomes available.
- Questions regarding project prioritization—The PEIS process will not be prioritizing projects. Projects are prioritized annually within the BLM, separate from the NEPA process.

Examples of site-specific comments are as follows:

- Requests for surveys or inventories
- Questions about specific treatment areas or location-specific calculations
- Requests for details that would not be feasible to provide at the programmatic level
- Questions about decisions that would be made during project implementation

The BLM does not provide an issue statement or discussion of consideration during the PEIS process for out-of-scope or site-specific comments.

The process of developing these PEISs will afford opportunities for collaboration with local, state, federal, and tribal governments; land management agencies; public interest groups; and public land users. As a result, these issues and concerns may need to be refined to reflect public comments and concerns.

3.1 ADAPTIVE MANAGEMENT AND MONITORING

3.1.1 Applicable to both PEISs

Issue: How, where, and to what extent will monitoring be used to determine the effectiveness of the projects?

Comment Summary
Commenters stated the need for implementation of a monitoring program to quantify the effectiveness and maximize the success of fuel breaks and fuels reduction projects. For example, commenters stated that in lentic, lotic, and meadow sites, areas back from the green line must be measured and monitored.

Further, cross-section monitoring must also take place to ensure the recovery of habitat components for species, such as sage-grouse brood rearing habitat.

Commenters also expressed concern that the BLM's process for selecting native grass cover monitoring sites is insufficient.

Consideration
The BLM will consider developing a design feature to address this issue, as appropriate, though details regarding monitoring will be site-specific. Sage-grouse will be monitored as defined in the ARMPAs.

3.1.2 Applicable to the Fuel Breaks PEIS
None.

3.1.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS
None.

3.2 AIR QUALITY

3.2.1 Applicable to both PEISs

Issue: How would the BLM protect air quality from impacts associated with potential actions in the PEISs?

Comment Summary
Commenters stated that agencies should not allow burning piles and allow wood to naturally decay to protect air quality and wildlife.

Consideration
The BLM will address this issue by complying with existing laws, including the Clean Air Act, and will consider developing a design feature, as appropriate, to minimize impacts on air quality. The BLM will address air quality as appropriate in the environmental consequences chapters of the PEISs.

Issue: Would a fugitive dust mitigation plan be developed for fuel breaks?

Comment Summary
Commenters requested that a fugitive dust mitigation plan be developed for firebreaks, reclamation projects, and projects with erosive soils that would identify the types of dust suppression available and how these dust mitigation actions would be triggered.

Consideration
The BLM will comply with direction in existing RMPs related to highly erosive soils and will consider developing a design feature to address this issue, as appropriate. The BLM will address impacts associated with fugitive dust, as appropriate, in the environmental consequences chapter of the PEIS.

3.2.2 Applicable to the Fuel Breaks PEIS

None.

3.2.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.3 ALTERNATIVES

3.3.1 Applicable to both PEISs

Issue: What tools and objectives will be included in the PEIS alternatives? Where will fuels treatments occur?

Comment Summary

Commenters requested a number of components to include or exclude from the PEIS alternatives. Some commenters requested inclusion of all possible tools to prevent fires. Some requested using active restoration, such as removing fences, facilities, and routes, as well as including water developments, while other commenters requested the sole use of passive restoration techniques.

Commenters suggested an alternative to limit annual fuels treatments within a given FIAT project planning area to less than 1 percent of the total area. Other commenters proposed treatment areas other than those identified by the FIATs, such as establishing ash districts or spacing treatments more evenly across the project area.

Commenters requested including goals of livestock rangeland management and sage-grouse habitat management in the alternatives.

Consideration

The BLM will consider this issue during alternatives development.

Issue: Will the Fuel Breaks and Fuel Reduction and Rangeland Management PEISs address the role of wild horses and burros in vegetation management?

Comment Summary

Commenters supported using wild horses and burros to manage vegetation, noting that wild horses eat cheatgrass and could help prevent the spread of this invasive species.

Consideration

The BLM will consider this issue during alternatives development.

3.3.2 Applicable to the Fuel Breaks PEIS

Issue: What criteria will be used to develop and site fuel breaks?

Comment Summary
Commenters suggested various alternatives components related to fuel break development. Some suggested developing fuel breaks of varying scope, scale, intensity, and widths. Others requested developing fuel breaks next to or in existing disturbed areas, such as cheatgrass-dominated low elevation ecosystems. Fuel breaks should be established along major travel routes or roadsides.

Consideration
The BLM will consider this issue during alternatives development.

3.3.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What methods will be used to reduce fuels and restore rangelands?

Comment Summary
Commenters requested that the BLM prohibit the use of active restoration techniques, except aerial seeding or hand planting shrubs or trees.

Consideration
The BLM will consider this issue during alternatives development.

Issue: Will the BLM use wild horses and burros to reduce fuels?

Comment Summary
Commenters believe that wild horses and burros should be restored, as they have the potential to reduce flammable vegetation.

Consideration
The BLM will consider this issue during alternatives development.

3.4 ECONOMICS

3.4.1 Applicable to both PEISs

Issue: What would the total cost of each alternative, including maintenance and restoration costs, be? Will a detailed economic analysis be provided? How will the analysis consider the economic viability of the projects?

Comment Summary
Commenters requested a detailed evaluation of the direct and indirect costs of each project, including costs of construction, treatments, machinery, and

maintenance as well as costs of the impacts on other resources and land uses as a result of proposed actions. Some also requested that this information be used to provide a robust economic analysis to detail and explain how the projects could be economically viable, reasonable, within the capacity of the agency, and implemented over the long term.

Some commenters were concerned that the costs of vegetation treatments and fuel break construction would be very high. In addition, concerns were expressed that the high cost associated with ongoing maintenance could prevent the BLM from adequately maintaining fuel breaks and treated areas, thereby increasing the risk of establishment by nonnative species in these areas.

Consideration
The BLM will address this issue, as appropriate, in the affected environment and environmental consequences chapters of the PEISs.

3.4.2 Applicable to the Fuel Breaks PEIS

Issue: What is the source of funding for initial construction and maintenance of fuel breaks, and do these funds account for ongoing maintenance? Are fuel breaks cost-effective?

Comment Summary
Commenters expressed concern about the cost of constructing and maintaining fuel breaks. Some requested that the PEIS include a plan for how fuel breaks and their maintenance will be implemented and funded over the long term and full disclosure and analysis of the economic effects associated with creating and maintaining fuel breaks.

Commenters requested information on the cost-effectiveness of fuel breaks relative to other methods of reducing wildfire risk, such as reducing livestock grazing.

Consideration
The BLM will address this issue, as appropriate, in the affected environment and environmental consequences chapter of the PEIS.

3.4.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.5 CULTURAL RESOURCES

3.5.1 Applicable to both PEISs

Issue: How will potential actions under the two PEISs affect cultural resources and how will the BLM monitor and reduce these impacts?

Comment Summary
Commenters expressed concerns about potential adverse impacts on historic landscape and viewshed resources due to fuels management on lands next to BLM-administered land. Use of heavy equipment would disturb and displace soils, thereby crushing and exposing artifacts and sites. Further, pile burning may destroy artifacts and site integrity; livestock may damage cultural sites and materials. Any activities that expose artifacts can also expose them to looting.

Commenters requested that the BLM develop treatments to protect cultural resources, historic woodlands (including old growth trees), traditional pine nut harvest areas, bow stave trees, or other signs of Native American use.

Commenters requested that the BLM provide specific protocols and schedules for cultural resources monitoring associated with fuels management.

Consideration
The BLM will consider developing design features to reduce impacts on cultural resources. Further, it will analyze impacts associated with the potential actions in the environmental consequences chapters of the PEISs.

Issue: How will potential actions under the two PEISs affect rock art sites?

Comment Summary
Commenters requested that the BLM consider all secondary impacts, such as increased traffic to areas containing rock art and changes to vegetation near rock art panels that may hasten the deterioration of rock surfaces.

Consideration
The BLM will analyze impacts associated with the potential actions in the environmental consequences chapters of the PEISs.

Issue: How will National Historic Trails be affected by potential actions under the two PEISs?

Comment Summary
Commenters stated that the proposed PEIS project boundary encompasses four National Historic Trails (NHTs) administered by the National Park Service's National Trails Program—California NHT, Oregon NHT, Pony Express NHT, and Mormon Pioneer NHT—as well as the Old Spanish NHT, which the National Park Service co-administers with the BLM.

Consideration
The BLM will disclose existing conditions in the affected environment chapters and will analyze impacts associated with potential actions in the environmental consequences chapters of the PEISs.

Issue: How will potential actions under the two PEISs affect paleontological resources and how will the BLM monitor and reduce these impacts?

Comment Summary
Commenters noted paleontological formations that could be affected in the project area. The commenters mentioned that fossil resources in these districts can be found on the surface of bare rock exposures or on grass-covered surfaces. In fact, any ground disturbance into bedrock may cause fossil and other scientifically valuable nonrenewable resources to be susceptible to impacts.

Commenters requested that resource advisors be on-site to advise crews when activities have the potential to disturb bedrock.

Consideration
The BLM will consider developing design features to reduce impacts on paleontological resources. Further, it will analyze impacts associated with the potential actions in the environmental consequences chapters of the PEISs.

3.5.2 Applicable to the Fuel Breaks PEIS
None.

3.5.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS
None.

3.6 DATA AND SCIENCE
The BLM received 222 comments that were coded as data and science. These included peer reviewed articles, references, and requests for new studies. The BLM will review these comments and will consider information presented when determining if plan modifications are necessary.

3.7 FISH AND WILDLIFE

3.7.1 Applicable to both PEISs

Issue: What are the projected impacts of the proposed projects, including removal of pinyon-juniper and sagebrush, on wildlife and their associated habitat? Will the BLM explain how it plans to protect these habitats?

Comment Summary
Commenters stated the need for the BLM to analyze the impacts of fuel breaks and fuels reduction on wildlife and wildlife habitat across the entire project area.

Of particular concern are potential adverse impacts such as from the use of herbicides and habitat loss or fragmentation. Commenters requested that the BLM establish a robust monitoring and adaptive management framework related to wildlife impacts.

Commenters requested that the analysis consider topography, which is a significant factor affecting wildlife habitat, and suggested that topography of the project area greatly reduces the impact on wildlife and is just as effective as or more effective than cover.

Commenters expressed concern over the practice of burning piles of slash and the effect of this activity on small mammals that may live inside the piles.

Commenters pointed out the value of pinyon–juniper to biodiversity and wildlife and were concerned that removal of woody vegetation would reduce habitat for species including migratory birds, bats, mule deer, raptors, and various other high-priority avian species. Some commenters noted that this vegetation type has already been extensively altered, and additional removal would reduce food sources, breeding habitat, shelter, and thermal cover for some species.

Likewise, commenters were concerned about alterations to and loss of sagebrush habitat, which would reduce habitat availability for sagebrush obligate species such as the pygmy rabbit. Some commenters requested that the BLM provide detailed explanation of how it plans to protect and restore sagebrush habitat.

Consideration
The BLM will consider developing design features to address concerns about fish and wildlife, as appropriate. Impacts on fish and wildlife will be analyzed in the environmental consequences chapters of the PEISs.

Issue: How will the specific needs and trends of different wildlife species be considered when developing the alternatives?

Comment Summary
Some commenters requested that the trends and habitat needs of certain sensitive wildlife species be documented. This information should be considered when developing the alternatives to protect species needs (e.g., for ample and undisturbed, high-quality over-wintering habitat).

Commenters pointed out that in the context of multiple-use lands, planning and implementation should include equal representation for raptors and the larger wildlife community.

Consideration
The BLM will comply with its multiple use mandate, which includes consideration of wildlife. To protect species, the BLM will consider fish and

wildlife during alternatives development and design features to minimize impacts, as appropriate.

The BLM will review existing data and will present applicable information in the affected environment chapters of the PEISs.

Issue: Will the BLM include active restoration methods in the PEISs?

Comment Summary
Some commenters suggested that active restoration be conducted to improve wildlife habitat (e.g., removal of fences/facilities/routes to reduce avian mortality, intensive disturbance zones, predator travel corridors, nest predator perches, brood parasite perches, and habitat fragmentation).

Consideration
While infrastructure removal is not within the scope of the PEISs, the BLM will consider conducting other active restoration activities related to vegetation treatments. It will consider these during alternatives development.

Issue: Will the timing of the proposed projects be designed to mitigate impacts on wildlife? Will there be buffer zones to protect species?

Comment Summary
Some commenters were concerned that vegetation treatments during certain times of the year would disturb nesting migratory birds and other wildlife. Commenters suggested that active restoration and human disturbance be avoided from late winter through early summer to reduce impacts on wildlife, such as destruction of bird nests.

Commenters suggested that buffer zones be laid out for avian species based on site-specific habitat, topography, and species' life history requirements. The commenters requested that best available science be used to design buffers for all affected species.

Consideration
The BLM will comply with wildlife guidance and buffers provided in other planning documents, such as RMPs and the Greater Sage-Grouse ARMPAs. It is BLM policy to use best available science; thus, it will consider developing design features to minimize impacts on wildlife, as appropriate.

3.7.2 Applicable to the Fuel Breaks PEIS

Issue: What are the impacts of fuel breaks on sagebrush species and habitat, and how will these impacts be avoided or mitigated?

Comment Summary
Many commenters were concerned that the construction of fuel breaks would damage or remove sagebrush ecosystems that provide habitat for many vertebrates, invertebrates, and plant species. They requested that the PEIS analyze the impacts of fuel breaks on these sagebrush species, prescribe ways to minimize negative impacts, and mitigate unavoidable impacts on these species.

Furthermore, commenters noted that fuel breaks may attract wildlife, wild horses, and livestock due to increased forage value and forage later in the growing season.

Consideration
The BLM will consider developing design features to minimize impacts on wildlife, as appropriate. Impacts associated with fuel break development and maintenance will be analyzed in the environmental consequences chapter of the PEIS.

Issue: To what extent will the proposed fuel breaks interfere with wildlife movement patterns, and how will the fuel breaks be designed to avoid habitat fragmentation?

Comment Summary
In addition, commenters requested the PEISs analyze the effects of fuel breaks on the movement and migration abilities of wildlife species. Commenters were concerned about potential habitat fragmentation due to the presence of fuel breaks; this could cause isolation and reduced genetic diversity, especially for smaller and/or less mobile species.

Consideration
Impacts associated with fuel break development and maintenance will be analyzed in the environmental consequences chapter of the PEIS.

3.7.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: How will the BLM balance the threat of fire and loss of wildlife habitat characteristics?

Comment Summary
Commenters were concerned that fuels reduction and restoration will alter or reduce habitats used by wildlife. Commenters suggested that the BLM should work with state wildlife officials to determine where the threat of fire outweighs the potential loss of favorable habitat characteristics.

Consideration
Impacts associated with fuels reduction and restoration will be analyzed in the environmental consequences chapter of the PEIS. The BLM will obtain input from cooperating agencies throughout the NEPA process.

Issue: How will restoration projects affect wildlife habitat?

Comment Summary
Commenters were concerned about the impact of fuels reduction and restoration on wildlife habitats and expressed the wish for restoration projects to provide benefits to sagebrush species.

Consideration
Impacts associated with fuels reduction and restoration will be analyzed in the environmental consequences chapter of the PEIS.

3.8 FIAT ASSESSMENTS

3.8.1 Applicable to both PEISs

Issue: How was the FIAT developed and how will it be utilized? How effective is the FIAT as an assessment tool?

Comment Summary
Commenters ask that the PEISs clearly explain and provide all scientific information, data, and model inputs related to the FIAT scheme. Other commenters asked how fire return and disturbance intervals are incorporated into the FIAT. Commenters also asked if there are sufficient peer-reviewed studies demonstrating the effectiveness of FIAT.

Consideration
FIAT assessments were developed as part of the Greater Sage-Grouse ARMPA process. They can be found on the website for that project: https://www.blm.gov/learn/blm-library/subject-guides/greater-sage-grouse-subject-guide/documents-and-resources.

3.8.2 Applicable to the Fuel Breaks PEIS
None.

3.8.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS
None.

3.9 FORESTRY AND WOODLAND PRODUCTS

3.9.1 Applicable to both PEISs

Issue: How will management of forest and woodland communities be addressed in the Fuel Break and Fuels Reduction PEISs?

Comment Summary
Commenters expressed opposition to cutting down pinyon and juniper trees. They note that if pinyon-juniper removal is included in the plans that it should only be included in the areas where these species have encroached upon sagebrush communities. Commenters requested that the BLM not use the Phase 1, 2, and 3 models for pinyon-juniper succession. Commenters noted that pinyon-juniper woodlands are unlikely to burn; they provide food, shelter, and cover for big game and sensitive species; and they enhance recreation. Some commenters expressed a general concern for removal of mature forests and requested more data, mapping, and analysis related to forested vegetation.

Consideration
The BLM will consider developing a design feature to address this issue, as appropriate. The affected environment chapters of the PEISs will present the baseline conditions for pinyon-juniper woodland. The BLM will use the latest science, including USDA General Technical Report RMRS-GTR-322-rev, A Field Guide for Selecting the Most Appropriate Treatment in Sagebrush and Pinon-Juniper Ecosystems in the Great Basin (Miller et al. 2014).

3.9.2 Applicable to the Fuel Breaks PEIS

None.

3.9.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: How can beetle-infested tree removal play a role in fire management in the PEIS?

Comment Summary
Commenters noted that one large opportunity for fuels reduction is removal of beetle-infested trees. Suggestions included cutting these trees down and burning them.

Consideration
The BLM will consider this issue during alternatives development. Beetles of concern are the pinion engraver beetle (*Ips confusus*) and cedar bark beetle

(*Phloeosinus* spp., especially *P. punctatus*), which attacks all native junipers, especially Rocky Mountain junipers) (Hagle et al. 2003).[1]

3.10 IMPACTS: DIRECT, INDIRECT, AND CUMULATIVE

3.10.1 Applicable to both PEISs

Issue: What are the direct, indirect, and cumulative impacts of the proposed actions? How will the BLM prevent undue degradation?

Comment Summary
Commenters stated that the BLM must consider all direct, indirect, and cumulative environmental impacts of the proposed action—including grazing disturbance and existing mining, oil and gas, and other disturbances—and limit these activities in the future. Commenters said the BLM needs to address these issues to prevent undue degradation.

Commenters requested that the PEISs balance the impacts on many resources and balance a range of impacts from each use. Commenters requested the BLM explore innovative management that uses grazing, fuels management, timber harvest, or other management to provide resource benefits by using or managing the resource.

Commenters requested the BLM consider the effectiveness of its proposed vegetation treatments with the likely benefits and adverse consequences.

Commenters expressed concern that these PEISs will encourage future consideration of a greatly expanded footprint of fuel breaks, juniper cuts, vegetation removal, and other attempts to alter the cheatgrass and fire feedback loop in the sagebrush steppe, and that this will have unintended, grave ecological consequences for greater sage-grouse habitat in the Great Basin.

Consideration
As appropriate, the BLM will consider developing design features to reduce impacts. Impacts associated with the proposed actions will be analyzed in the environmental consequences chapters of the PEISs.

Issue: How will the BLM define "proper management" and how it relates to "best management practices" within the proposed projects?

Comment Summary
Commenters requested a definition of "proper management," how it comports with "best management practices," and how consideration of potential impacts

[1] Hagle, S. K., K. E. Gibson, and S. Tunnock. 2003. A field guide to insects and pests of northern and central Rocky Mountain conifers. US Forest Service Northern and Intermountain Regions. Missoula, Montana and Ogden, Utah.

of livestock grazing, wild horse and burros, and mining and energy developments will be analyzed within proposed projects.

Commenters asked if the PEISs use the assumption of "proper management" by the BLM or all threats to sagebrush ecosystem health and if the potential impacts of "improper" management will be addressed in fuels and restoration projects.

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapters of the PEISs. Applicable terms in the PEISs will be defined in the glossary.

Issue: What are the impacts of fencing utilized to facilitate targeted grazing or posttreatment grazing?

Comment Summary
Commenters requested the BLM analyze the impact of any fencing used to facilitate targeted grazing or regular posttreatment grazing.

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: How will the BLM minimize use of pesticides and analyze impacts from pesticide use?

Comment Summary
Commenters stated that the BLM must consider the unforeseen consequences of pesticide use. Commenters stated that the BLM's use of Oust, a sulfonyurea-based pesticide, damaged crops up to a quarter mile away from the application site. Commenters requested that the BLM should exercise the utmost care and caution regarding pesticides, and it should avoid pesticide use wherever feasible.

Consideration
The BLM will tier to the its Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2007) and its Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2016), regarding the use and impacts of approved herbicides. In addition, the BLM will address this issue, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: How will the BLM ensure the effectiveness of project design features to minimize PEIS impacts?

Comment Summary
Commenters requested the BLM ensure the effectiveness of project design features to minimize potential negative impacts of the proposed fuels/restoration projects in the PEISs.

Consideration
The BLM will consider incorporating project design features monitoring during alternatives development.

Issue: What are the impacts from forage loss and biological thinning on wildlife species and livestock?

Comment Summary
Commenters stated that the PEISs must provide a comprehensive examination of how loss of forage will affect wildlife species and livestock and how the loss of forage affects livestock grazing permits.

Commenters stated that the PEISs should provide a detailed, relevant examination of the impacts of "biological thinning."

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: What are the effects of all land uses on fires and fuels?

Comment Summary
Commenters stated that the PEISs must analyze the effects of all land uses on fires and fuels.

Consideration
The BLM will address this issue, as appropriate, in the affected environment and environmental consequences chapters of the PEISs.

Issue: Will the BLM review baseline studies prior to conducting an impacts analysis?

Comment Summary
Commenters stated that the BLM should conduct reviews of past projects, baseline species inventories, and other targeted studies when conducting an impact analysis.

Consideration
The BLM will address this issue, as appropriate, in the affected environment and environmental consequences chapters of the PEISs.

Issue: Will the BLM conduct a risk assessment to determine impacts from fuel breaks and other treatment schemes?

Comment Summary
Commenters stated that the BLM must conduct a risk assessment to determine the extent to which fuel breaks and other treatment schemes may cause increased, continuous flammable exotic grasses, cause loss of biodiversity, adversely affect native biota, cause loss of microbiotic crusts, accelerate soil erosion, and fail to achieve results predicted.

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapters of the PEISs.

3.10.2 Applicable to the Fuel Breaks PEIS

Issue: What are the cumulative impacts of fuel breaks? How will the BLM develop mitigation measures to reduce these types of impacts?

Comment Summary
Commenters requested an analysis of the reasonably foreseeable adverse cumulative impacts on the sagebrush steppe ecosystem and related environmental resources, including air and water quality. The commenters recommended the BLM develop mitigation measures to reduce these indirect impacts of the proposed actions.

Consideration
The BLM will consider developing a design feature to address this issue and will analyze this issue, as appropriate, in the environmental consequences chapter of the PEIS.

Issue: What methods will be utilized to create fuel breaks? What are the impacts on air quality, viewshed and visitor experience, vegetation, wilderness, wildlife, and habitat fragmentation? How will impacts be minimized?

Comment Summary
Commenters expressed concerns regarding fuel breaks methods and the potential effects on air quality, viewshed and visitor experience, native vegetation, and wildlife movement corridors. Commenters requested the BLM work to prevent fuel breaks from becoming corridors where high concentrations of invasive species become established and then spread from these new, intensive, and ongoing surface disturbances.

Commenters requested the BLM minimize impacts by making the "fire containers" as large as possible, so that the edge-to-area ratio is as small as possible to protect resources.

Commenters expressed concern over habitat fragmentation due to fuel breaks.

Consideration
The BLM will consider developing a design feature to address this issue and will analyze it, as appropriate, in the environmental consequences chapter of the PEIS.

Issue: How will the BLM address conflicts between proposed fuel breaks methods and the BLM mission of rangeland restoration?

Comment Summary
Commenters expressed concern in how herbicide treatment conflicts with other proposed PEIS's missions of rangeland restoration. Commenters requested that the use of herbicides, their potential adverse impacts on healthy rangelands, and criteria or protocols on when their use is appropriate or not appropriate be analyzed.

Consideration
The BLM will tier to the its Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2007) and its Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2016) regarding the use and impacts of approved herbicides. In addition, the BLM will address this issue, as appropriate, in the environmental consequences chapter of the PEIS.

Issue: How will the BLM ensure that Great Basin biodiversity is not affected by proposed fuel breaks?

Comment Summary
Commenters expressed concern regarding the overall cumulative impacts on the diversity of Great Basin vegetation from conifer removal projects, especially if fuel breaks are not as successful as the BLM hopes in stopping or controlling wildfires, cheatgrass, and invasive species.

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapter of the PEIS.

3.10.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What herbicides may be used and what are the impacts from herbicide treatments?

Comment Summary
Commenters requested the BLM disclose the types of herbicides that would be used in suppressing cheatgrass and what the impacts from these herbicides would be.

Commenters stated that the BLM must consider impacts from herbicides on imperiled amphibian populations.

Consideration
The BLM will tier to the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2007) and its Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2016) regarding the use and impacts of approved herbicides. In addition, the BLM will address this issue, as appropriate, in the environmental consequences chapter of the PEIS.

Issue: What are the short- and long-term effects of conifer removal as a treatment method for fuels reduction?

Comment Summary
Commenters requested that the BLM analyze the short- and long-term effects of conifer removal treatments on hydrology, geochemical cycling, vegetation, wildlife, fuels, fire behavior, and economics.

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapter of the PEIS.

3.11 LIVESTOCK GRAZING

3.11.1 Applicable to both PEISs

Issue: How will the BLM manage livestock grazing to prevent or reduce invasive species?

Comment Summary
Commenters stated that livestock should be quarantined for several days before moving from weed-infested private or state lands onto BLM-administered lands.

Other commenters stated that road closures and/or greatly limiting road blading disturbances helps to prevent weed invasion and outward spread by livestock into disturbed grazed sites, such that natural recovery may occur.

Commenters suggested that treated areas be reseeded to ensure that exotic species are not able to become established.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate. The agency will analyze this issue, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: How will the BLM involve livestock contractors to manage fuels? What classes of livestock will be used to achieve objectives?

Comment Summary
Commenters requested that the BLM utilize livestock contractors to assist with fuel breaks and fuels reduction. Further, some commenters suggested that the definition of "livestock" include appropriate numbers of sheep or cattle, and not be limited to goats to achieve objectives.

Commenters requested that no areas of a pasture and allotment, including those receiving the most intensive use by livestock, should be allowed to receive greater than 10 percent of the surface area being trampled.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate.

Issue: How will the BLM minimize and analyze the impacts of targeted grazing on the ecosystem, recreational users, and wildlife?

Comment Summary
Commenters stated that during targeted grazing operations, supplements should be banned to prevent the spread of noxious weeds or the attraction of nonnative wildlife. Other commenters requested that the BLM remove livestock grazing, fences, water developments, and salt supplements in important wildlife habitats. Commenters stated that the agency must assess potential adverse impacts on aquatic biota, wildlife, and recreationists from livestock supplement use.

Commenters requested that the BLM consider impacts from grazing, including weed invasion and spread; degradation of wildlife habitat components of food, cover, space, and habitat security; habitat fragmentation; influence on pinyon and juniper expansion; or spread of diseases like West Nile virus that are a threat to migratory birds, sage-grouse, and recreational visitors. Other commenters

requested careful consideration of livestock interactions with wildlife species such as bighorn sheep.

Commenters requested a spatial analysis of livestock disturbance as a cumulative impact.

Consideration
The BLM will consider developing design features to address this issue and will analyze it, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: How will the BLM manage livestock grazing to enhance fuels management and protect other resources? Will the BLM make changes to grazing levels, infrastructure, timing, or locations?

Comment Summary
Commenters stated that targeted grazing is an economically and ecologically effective tool to prevent large fires by reducing fuel loading and creating fuel breaks. Others further argued that if lands were grazed to their potential, there would be significant reductions of fuels, which would reduce wildland fires and reduce the necessity for, or degree of, additional fuel break treatments.

Commenters also recommended that grazing with adequate numbers of livestock would curtail invasive species spread (such as cheatgrass) without the use of herbicides.

Commenters suggested expanding the use of targeted grazing rather than limiting its use to fuel breaks only. Similarly, other commenters suggested that targeted grazing should not be constrained by acreage limitations.

Other commenters stated that grazing and ranching on public lands should not be the primary purpose of these fuels reduction activities. They pointed out that grazing has been detrimental in the past as a fuels management treatment.Other commenters suggested changes to grazing management. For example, some commenters requested that the BLM consider extending the customary 2-year posttreatment rest period and reducing posttreatment livestock numbers. Commenters requested 10 to 20 years of rest to all pastures that are treated. Other commenters requested that the BLM allow a moderate intensity of use or a short duration of use; the BLM remove grazing for a period of time to allow for sufficient recovery of plant health; and that grazing should not occur at the same time year after year.

Commenters stated that fences and roads for livestock access can fragment and isolate segments of natural ecological mosaics, thus influencing the capability of wildlife to adapt to a changing climate. Others suggested using active restoration, such as removing fences, facilities, and routes.

Some commenters requested that grazing and associated infrastructure be excluded from important wildlife conservation areas, such as habitats of sensitive terrestrial and aquatic biota, native raptor species, wintering migratory birds, native predators, and big game. Other commenters requested seasonal restrictions on grazing and trailing, such as during nesting, birthing, and young rearing periods or during winter periods, to prevent stress, disturbance, and displacement.

Commenters stated that no grazing should occur in riparian areas and native fish and amphibian habitats when redds and/or egg masses are present. Other commenters argued that erosion triggered by livestock use is a major source of sediment, nutrients, and pathogens in western US streams.

Some commenters stated that livestock use effects, exacerbated by climate change, often have severe impacts on upland plant communities.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate. Any grazing management and resource protections will comply with existing laws, regulations, and policies, including RMPs and the Greater Sage-Grouse ARMPAs. Effects associated with livestock grazing will be addressed, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: How will adaptive management be applied to livestock grazing management?

Comment Summary
Commenters stated the need for adaptive management, based on a large set of tools and strategies, to determine the timing and utilization of pastures by livestock.

Consideration
The BLM will consider this issue during alternatives development.

3.11.2 Applicable to the Fuel Breaks PEIS

Issue: How will the BLM implement targeted grazing to create and maintain fuel breaks?

Comment Summary
Commenters requested that grazing be closely managed to support the proper functioning of fuel breaks. If areas of unsustainable use occur, adjustments in livestock timing, intensity, or duration can become necessary.

Commenters requested that the BLM expand the rest period to at least four growing seasons at a minimum. This would ensure that the public's investment

in the treatment is not put at risk by premature grazing that could greatly reduce the intended benefits of the treatment.

Commenters noted that targeted grazing, which requires short-term, concentrated high stocking rates of livestock to remove the current year's growth prior to the onset of fire, may be an effective way to promote fire resistance.

Consideration
The BLM will consider this issue during alternatives development, including incorporating adaptive management. It will consider developing design features to address this issue, as appropriate.

Issue: What is the impact of livestock grazing in fuel breaks on wildlife habitat and noxious weed spread? How would fuel breaks within grazing leases be monitored to reduce the likelihood for impacts?

Comment Summary
Commenters requested that the PEIS ensure the use of grazing strategies that are benign and/or beneficial to sagebrush habitats and sagebrush obligate wildlife species.

Commenters recommended that the BLM manage livestock grazing to improve wildlife habitat rather than create fuel breaks.

Commenters expressed concern that within a grazing lease, it would be difficult to discern between poor stockmanship and fuel breaks as the reason for an increase in weedy plants.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate. The agency will analyze this issue, as appropriate, in the environmental consequences chapter of the PEIS.

3.11.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What are the impacts of targeted grazing on other resources?

Comment Summary
Commenters requested an impacts analysis of existing grazing as a fuels reduction treatment. Other commenters requested that the BLM acknowledge the role of livestock grazing in altering vegetation structures, changing soil characteristics, spreading nonnative grasses, and increasing fire risk. Other commenters expressed concern that grazing has depleted sage-grouse habitat across the West. Commenters stated that there are significant impacts of grazing on species composition and overall ecosystem resilience.

Commenters stated that targeted grazing can result in the overutilization of forage that may facilitate cheatgrass expansion, reduce desirable perennial grass species, disturb biological soil crusts, affect riparian vegetation, and degrade water quality. Commenters requested that the PEIS provide a detailed explanation how fuel reduction through "biological thinning" will avoid such impacts while also resulting in any appreciable change in fuels.

Consideration
The BLM will address this issue, as appropriate, in the affected environment and environmental consequences chapter of the PEIS.

Issue: Will the BLM use targeted grazing to reduce fuel loading and the spread of invasive species? If so, how, where, and when will the BLM use targeted grazing?

Comment Summary
Commenters suggested that targeted grazing is an economical solution for reducing fuel loading. This includes planned grazing systems and grazing in the fall/winter. Commenters requested flexibility in using livestock as part of the rehabilitation process after a burn.

Some commenters suggested that the BLM consider periods of grazing, season of use, or other factors to diminish the dominance of invasive annual grasses. Commenters suggested that encouraging earlier grazing would reduce cheatgrass in at-risk areas.

Other commenters stated that grazing is not a demonstrated sufficient solution for cheatgrass reduction on a landscape scale and is an expensive tool to utilize. Commenters requested that the BLM remove livestock from areas of flammable invasive weeds, such as medusahead, as they may spread onto public lands. Others requested that the BLM include mitigation measures for livestock grazing in areas where restoration has occurred.

Commenters requested that native biota, including old-growth, be protected to maintain value for wildlife species.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate. The BLM will analyze this issue as appropriate in the environmental consequences chapter of the PEIS.

3.12 POST-FIRE RESTORATION AND MAINTENANCE

3.12.1 Applicable to both PEISs

None.

3.12.2 Applicable to the Fuel Breaks PEIS

Issue: How will the BLM maintain fuel breaks and ensure their effectiveness? What is the BLM's plan for long-term maintenance and monitoring of projects?

Comment Summary
Commenters expressed concern that firebreaks do not effectively prevent large-scale wildfires over the long term because they require frequent maintenance and often become infested with invasive vegetation.

Commenters requested that the PEIS specifically explain how and when maintenance of fuel breaks will be carried out and that the environmental effects of the required maintenance be analyzed. Considering the failed maintenance of existing fuel breaks, the BLM should explain how maintenance programs will differ from failed plans.

Commenters suggested that the BLM conduct post-implementation monitoring of project sites to provide information on resource conditions and that it assess how often future retreatments would be necessary.

Another thought fuel breaks are unnecessary as long as active management is regularly employed in resilient habitats.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate. The BLM will analyze this issue as appropriate in the environmental consequences chapter of the PEIS.

3.12.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What is the BLM's proposed plan for long-term maintenance of restoration areas?

Comment Summary
Some commenters requested information on the plan for long-term maintenance of restoration areas, including the types of restoration that are being considered.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it, as appropriate.

3.13 PROCESS: PUBLIC OUTREACH

3.13.1 Applicable to both PEISs

Issue: How will the public and stakeholders be involved and informed throughout the NEPA process? How will streamlining affect the public's role in the NEPA process?

Comment Summary
Commenters were concerned with the role of NEPA streamlining in this project and asked to be kept well informed to help with their understanding of this process. Some suggested that nearby ranchers and other stakeholders should be included in the planning process.

There was concern that the public wasn't involved early enough, and commenters requested the public to be heard at all stages of the planning process. There is also concern that the project and environmental documents, such as categorical exclusions, will be used to avoid full NEPA compliance. Others asked that categorical exclusions or NEPA adequacy review be the limit of NEPA analysis. Commenters asked for the opportunity to provide input at both PEIS and site-specific levels.

Commenters supported using local sources, such as state and county agencies, to provide information on restoration. Comments were written in support of restoration decisions at the local level for successful restoration. Some commenters felt that the best way to implement the PEIS goals is at the county level.

Commenters requested collaboration between the BLM and the Watershed Restoration Initiative to implement fuels treatment projects that improve water quality, watershed health, and biological diversity.

Moving forward, commenters asked for more public involvement opportunities, outreach, and informational materials. Commenters requested more detail on the PEISs, including how the PEISs will provide opportunities for volunteers to be incorporated into restoration actions.

Consideration
The BLM will follow public outreach regulations and guidelines, in accordance with NEPA and BLM regulations. Relevant information will be posted on the ePlanning website (https://go.usa.gov/xnQcG), and interested members of the public will be updated via project newsletters. For site-specific projects, the BLM will conduct additional outreach at the local level.

The BLM cannot use a categorical exclusion to create fuel breaks or conduct fuels reduction. Categorical exclusions available for use by the BLM are specified in Chapter 4 of the BLM NEPA Handbook (H-1790-1, found online at

https://www.ntc.blm.gov/krc/uploads/366/NEPAHandbook_H-1790_508.pdf). A 2009 BLM Instruction Memorandum (IM 2009-199, found online at https://www.ntc.blm.gov/krc/uploads/454/IM_2009-199_Fuels,Veg,GrazingCXs .pdf) rescinded the use of categorical exclusions for fuels reduction, certain vegetation management activities, and grazing permit issuance.

3.13.2 Applicable to the Fuel Breaks PEIS

Issue: How will the public be involved and informed about the project?

Comment Summary
Commenters noted that landowners in the area want to know if fuel breaks will interfere with the continued use of their land.

Commenters suggested that livestock producers be consulted before seeding projects require allotments to be rested.

Commenters requested that the BLM include an alternative and desired condition that ensures the BLM works closely with livestock permittees, landowners, local governments, and all other affected groups during planning to implement treatments.

Consideration
Projects under consideration will not affect use of private lands. The BLM will follow public outreach regulations and guidelines under NEPA and BLM regulations. Relevant information will be posted on the ePlanning website (https://go.usa.gov/xnQcG), and interested members of the public will be updated via project newsletters.

3.13.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: How will restoration be defined in the PEIS?

Comment Summary
Commenters were concerned that the meaning of "restoration" wasn't defined for the purposes of this PEIS, making it difficult for the public to comment.

Consideration
The BLM will define restoration in the Fuels Reduction and Rangeland Restoration PEIS.

3.14 PURPOSE AND NEED

3.14.1 Applicable to both PEISs

Issue: Can the BLM provide more information related to the purpose and need for the PEISs? How does the BLM define certain terms used in describing the project?

Comment Summary
Commenters asserted that the BLM's mission of promoting multiple use and sustained yield must be detailed in the PEISs.

Some commenters questioned the definition of some terms used in the public scoping materials. Commenters noted that the term "restoration" is a goal but is not clearly defined. The term "restoration" can mean different things to different user groups. Commenters noted that a part of the stated purpose is to support the "western lifestyle." Without a definition, this term is vague and may be offensive to some. Commenters stated that the term "rangelands" implies that grazing is the primary purpose of the land. Other commenters requested a better explanation of the term "rangeland restoration" and associated goals and objectives.

Consideration
Definitions and the BLM's mission will be included in the PEISs, potentially in a glossary or appendix.

Issue: Is sage-grouse management part of the purpose and need for the projects? Are fuels reduction projects effective in sagebrush?

Comment Summary
Commenters noted that sage-grouse management is not addressed in the purpose and need. If fuel breaks and fuels reduction will be used for sage-grouse management, it should be stated in the purpose and need. Other comments were concerned with the lack of research surrounding fuels reduction and biological thinning in sagebrush.

Consideration
While greater sage-grouse management is not explicitly part of the purpose and need for the PEISs, both aim to protect and conserve the sagebrush steppe ecosystem, that the greater sage-grouse and many other wildlife species depend on. The BLM will address impacts on greater sage-grouse, as appropriate, in the environmental consequences chapters of the PEISs.

Issue: How will programmatic actions support site-specific BLM proposals? What is the BLM's rationale for preparing two PEISs?

Comment Summary
Some commenters felt that the communities, habitats, and people that the BLM needs to protect are site specific. As such, addressing them through a programmatic action is not appropriate.

Some commenters felt that fuel breaks and fuel reductions are connected actions and should be considered in one PEIS. Combining the actions into a single PEIS would allow for the more efficient reconciliation of different restoration strategies. Some comments expressed support for completing the two PEIS actions concurrently, while others would prefer the reduction and restoration PEIS to take place prior to the fuel breaks PEIS.

Other commenters felt that the project tries to consider too many tools and that the Great Basin is too varied for the application of widespread assumptions and impacts. The connections between resources are not considered in enough depth, and the focus areas are considered without including surrounding areas that may be affected. In this case, some argue it would be simpler to have more EIS documents that are more region specific.

Consideration
The BLM is preparing these PEISs concurrently in order to gain efficiencies in scoping and effects analyses. Programmatic analysis allows for effective cumulative impacts analysis and helps streamline site-specific NEPA analyses.

Two PEISs will be prepared due to the nature of these PEISs, the scope for each topic, and differences in purpose and need. Site-specific NEPA analyses will be completed at the project level to address local issues.

Issue: How did the BLM determine the project area for the PEISs?

Comment Summary
Commenters asserted the PEISs should be applied in the Rocky Mountain region, as the need is greater there. Others felt that lower elevations in western and west-central Nevada should be included in the project area.

Consideration
The BLM will consider describing the rationale for determining the project area in Chapter 1 of the PEISs or in the project record.

3.14.2 Applicable to the Fuel Breaks PEIS

None.

3.14.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.15 PUBLIC HEALTH AND SAFETY

3.15.1 Applicable to both PEISs

Issue: What is the impact of herbicides on public health and safety?

Comment Summary
Commenters stated that the BLM's demonstrated use of herbicides in the public scoping video endangers public health and safety.

Consideration
The BLM will tier to the BLM's Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2007) and Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2016) regarding the use and impacts of approved herbicides.

3.15.2 Applicable to the Fuel Breaks PEIS

None.

3.15.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.16 RECREATION

3.16.1 Applicable to both PEISs

Issue: Will the BLM change travel and recreation management, including off-highway vehicle (OHV) access, in the PEIS planning areas? What are the impacts of this management?

Comment Summary
Commenters asked the BLM to consider how vegetation management can affect both motorized and nonmotorized recreation. Commenters requested that recreation staff be included in the development of trail and road mitigation guidelines to include in the PEISs.

Commenters noted that impacts should be addressed from a sportsman's standpoint; an objective must be included, in each proposed project, assessing impacts on the recreation spectrum of opportunity.

Consideration
The BLM will consider developing design features to address this issue, as appropriate, and will analyze it, as appropriate, in the environmental consequences chapters of the PEISs.

3.16.2 Applicable to the Fuel Breaks PEIS

Issue: How will the BLM manage OHV use in fuel break areas?

Comment Summary
Some commenters were concerned that fuel break construction will increase human activity in remote areas, and possibly increase fires caused by OHVs. Commenters expressed concern regarding the impacts and benefits of motorized recreation on the human environment.

Consideration
The BLM will analyze this issue, as appropriate, in the environmental consequences chapter of the PEIS.

3.16.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.17 RELATIONSHIP WITH OTHER FEDERAL, STATE, OR LOCAL POLICY

3.17.1 Applicable to both PEISs

Issue: How will the PEISs incorporate guidance from the Greater Sage-Grouse Approved Resource Management Plan Amendments? How will fuel break construction activities affect habitat areas and disturbance caps for greater sage-grouse?

Comment Summary
Some commenters requested that the BLM follow requirements for greater sage-grouse habitat identified in exiting greater sage-grouse management plans, such as the ARMPAs of 2015, when developing alternatives. Commenters pointed out that the Fuel Breaks PEIS must be consistent with the previous plans. Some commenters requested information as to how the projects would affect the Sage-Grouse Conservation Credit System. Others argue that the BLM has not stated how the PEISs will comply with the ARMPAs.

Commenters stated that the PEISs must address the effects of fuel breaks on sage-grouse habitat surface disturbance caps promulgated through the ARMPAs.

Commenters stated that fuel breaks should be excluded from priority habitat management areas defined in the ARMPAs and should be located to prevent the spread of high-intensity wildfire into these areas.

Consideration
The BLM will comply with existing plans, laws, regulations, and policy, including such guidance as the Greater Sage-grouse ARMPAs. The BLM will consider this issue during alternatives development and in the environmental consequences chapters of the PEISs, as appropriate.

3.17.2 Applicable to the Fuel Breaks PEIS

Issue: How will the PEIS incorporate guidance from the Greater Sage-Grouse Approved Resource Management Plan Amendments?

Comment Summary
Commenters requested that the proposed action be consistent with existing BLM policies and plans, including the Oregon Sage-Grouse ARMPA.

Consideration
The BLM will address this issue through compliance with existing plans, laws, regulations, and policies, including such guidance as the Greater Sage-grouse ARMPAs.

3.17.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: How will the PEIS incorporate guidance from the Greater Sage-Grouse Approved Resource Management Plan Amendments?
Commenters stated that in the 2015 Decision and ARMPA there is little to no language about using livestock grazing as a tool to improve ecological condition.

Consideration
The BLM will review existing plans, laws, regulations, and policies, including such guidance as the Greater Sage-grouse ARMPAs, and will consider this issue during alternatives development to ensure compliance with these plans.

3.18 SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE

3.18.1 Applicable to both PEISs

Issue: What are the socioeconomic impacts? Will the analysis separate social issues from economic issues?

Comment Summary
Commenters requested that the PEISs include an analysis of impacts on socioeconomics. One was concerned that it will be difficult to separate social issues from economic issues and suggested that emphasis should be given to analysis of local economics. As social issues often are directly related to local economics, actions that benefit the local economy will create social benefits.

Commenters suggested that the BLM conduct an economics analysis, including valuations based on nonmarket values and traditional market values, and that all data be compared in a detailed and well-supported cost-benefit analysis.

Commenters requested that forestry values be assessed, including costs incurred from the loss of wood products. Another requested a candid socioeconomic analysis that considers costs from loss of recreation

opportunities, loss of sustainable and clean water sources, noxious weed management, grazing administration, and agency monitoring.

Consideration
The BLM will address this issue in the socioeconomic reports, one for each PEIS, which will be available on the ePlanning website (https://go.usa.gov/xnQcG). The BLM will incorporate a summary of these impacts in the environmental consequences chapters of the PEISs.

Issue: How will the proposed projects affect local economies?

Comment Summary
Some commenters noted the potential for the proposed projects to stimulate local economies by increasing job opportunities. Commenters noted that removed trees could be used for lumber and would therefore spur the housing market.

Consideration
The BLM will consider this issue in the environmental consequences chapter of the PEIS, as appropriate.

3.18.2 Applicable to the Fuel Breaks PEIS
None.

3.18.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS
None.

3.19 SOIL RESOURCES

3.19.1 Applicable to both PEISs

Issue: What are the impact to soils, and how will the BLM minimize these impacts?

Comment Summary
Commenters stated that soil in mechanically treated areas would be susceptible to the greatest impacts, such as soil compaction, displacement, and subsequent soil erosion. Thus, mechanical treatments significantly add to the risk of posttreatment soil erosion. Commenters were concerned that soil disturbance will drastically increase heat load, which needs to be quantified.

Commenters stated that erodible soils are often damaged by chronic livestock grazing and other disturbance, and erosion caused by wind and water must be sharply limited.

Commenters stated that land management agencies should prioritize soil recovery, as it is the very basis of a healthy sagebrush steppe ecosystem.

Consideration
The BLM will consider developing design features to address this issue and will analyze it in the environmental consequences chapters of the PEISs, as appropriate.

Issue: What are the impacts to microbiotic crusts? How will the BLM reduce impacts on microbiotic crusts?

Comment Summary
Commenters requested that the BLM include specific required measurable standards that protect microbiotic crusts, understory components, and shrub structure as mandatory measurable terms and conditions.

Commenters stated that the loss of crusts due to fuel breaks and treatments will harm or destroy crusts over vast areas.

Consideration
The BLM will consider developing design features to address this issue and will analyze it in the environmental consequences chapters of the PEISs, as appropriate.

3.19.2 Applicable to the Fuel Breaks PEIS

Issue: What measures will the BLM employ to minimize impacts on soil resources associated with fuel breaks?

Comment Summary
Commenters requested that the BLM create measures to keep fuel breaks from becoming avenues for runoff and erosion.

Consideration
The BLM will consider developing design features to address this issue, as appropriate.

3.19.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What are the impacts on microbiotic crusts as a result of fuels reduction and restoration efforts?

Comment Summary
Commenters stated that crusts are important soil function indicators that need to be considered. Commenters stated that sources of impacts on biotic crusts include heavy equipment, pile burning, wood chips smothering them, and deforestation exposing sites to even more intensive grazing impacts such as soil/crust trampling, deposition of weed-causing manure, and eating fragile native plants.

Commenters stated that microbiotic crusts tend to reduce the spread of invasive species; livestock grazing associated with this PEIS will harm or destroy microbiotic crusts.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to address it. The agency will analyze this issue in the environmental consequences chapter of the PEIS, as appropriate.

3.20 SPECIAL DESIGNATIONS, INCLUDING LANDS WITH WILDERNESS CHARACTERISTICS

3.20.1 Applicable to both PEISs

Issue: What are the impacts to special designation areas from fuels reduction and fuel breaks?

Comment Summary
Commenters asked that impacts from fuels reduction and fuel breaks to areas of special concern, such as sage-grouse Priority Habitat Management Areas, wilderness study areas, lands with wilderness characteristics, and other undisturbed areas, be critically analyzed and minimized.

Consideration
While the BLM is not proposing fuel breaks in designated Wilderness Areas, Wilderness Study Areas, or areas designated as having lands with wilderness characteristics in this document, site-specific analysis could occur at the local level. The BLM will consider developing design features to include in the Fuels Reduction and Rangeland Restoration PEIS and will incorporate them into the environmental consequences chapters as appropriate.

Issue: How will the alternatives address management of special designations areas in the project area?

Comment Summary
Commenters requested that treatments in special designation areas be required to meet a higher threshold of need and to include measures to mitigate negative effects. Commenters would like an alternative that avoids treatments in wilderness study areas, areas of environmental concern, wild and scenic rivers, wilderness areas, priority sage-grouse habitat, and other sensitive areas. Commenters specifically mentioned not using heavy equipment, such as bulldozers, in sensitive areas.

Commenters felt that lands with wilderness characteristics should have management that would minimize impacts and that would have no permanent impacts. Commenters stated that lands with wilderness characteristics have a higher threshold of need if at risk of being damaged. Some commenters stated that there should not be fuel breaks in roadless areas.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to reduce impacts.

3.20.2 Applicable to the Fuel Breaks PEIS

Issue: How would lands with wilderness characteristics in Oregon be affected by fuel breaks?

Comment Summary
Commenters stated that the BLM should carefully examine all proposed fuel breaks in the Oregon portion of the project area. The agency should evaluate and disclose whether and how the fuel breaks affect these lands with wilderness characteristics and whether they comport with the Oregon Natural Desert Association Settlement Agreement.

Consideration
The BLM will address this issue, as appropriate, in the environmental consequences chapter of the PEIS.

3.20.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.21 SPECIAL STATUS SPECIES

3.21.1 Applicable to both PEISs

Issue: How will the proposed projects affect special status species, and how will these impacts be analyzed?

Comment Summary
Commenters requested that both PEISs thoroughly analyze the potential impacts of the proposed actions on special status species and their habitats, such as pygmy rabbit populations. Some commenters requested information on how the analysis would be conducted and requested that the BLM prepare a full biological assessment to evaluate the impacts of the projects on special status species.

Commenters noted that the PEISs should recognize the importance of conservation of native vegetation communities as habitat for special status species. Further, some commenters noted that the BLM could use the proposed projects to provide greater protections to and enhance habitat for special status species. Some commenters wished to know whether grazing in special status species' habitats would affect populations and reproductive success.

Consideration
The BLM will consult with the US Fish and Wildlife Service and National Oceanic and Atmospheric Administration Fisheries, in accordance with Section 7 of the Endangered Species Act, as required. The agency will also consider developing design features and will address this issue in the affected environment and environmental consequences chapters of the PEISs, as appropriate.

Issue: How will the BLM manage fuels treatments in sage-grouse habitat?

Comment Summary
Commenters requested that the BLM manage fuels where livestock are reduced or removed from important sage-grouse habitats to allow for the recovery of native vegetation. Others suggested focusing active restoration on nonnative seedings as an alternative focus could be failed fire rehabilitation areas and other areas with minimal sagebrush cover near occupied greater sage-grouse habitats. Commenters requested that pinyon and juniper trees be removed only within 100 meters of sage-grouse leks.

Consideration
The BLM will consider this issue during alternatives development.

Issue: How will the proposed projects, both individually and cumulatively with past activities, affect the greater sage-grouse and its habitat? How will the BLM minimize impacts on greater sage-grouse populations?

Comment Summary
Commenters expressed concern regarding potential effects of the proposed projects on the greater sage-grouse and its habitat. They requested that, in both PEISs, the BLM consider the full extent of likely impacts on sage-grouse throughout the project area.

Commenters asked for information on how the BLM would prevent impacts on greater sage-grouse populations and habitat and suggested that the BLM identify a conservation strategy for the species. Other commenters stated that the BLM must ensure that the proposed approaches are consistent with ecological conservation goals. These commenters also stated that the approaches result in minimum impacts on greater sage-grouse habitat and other area resources and resource uses. They asked that the BLM analyze the project in a comprehensive fashion to understand the cumulative impacts of connected and related actions.

Commenters identified wildfire, habitat restoration activities, and habitat fragmentation as threats to greater sage-grouse persistence. Other commenters noted passive restoration, invasive species control, and restoration of the diversity and cover of native species while retaining sagebrush cover as important ecological restoration needs in greater sage-grouse habitat.

Commenters suggested that the BLM analyze local and regional greater sage-grouse population and habitat trends based on best available science and consider how previous human activities have affected these trends. Commenters requested information as to how populations are defined and monitored and where existing sagebrush habitat meets criteria for desirable habitat attributes and habitat needs.

Consideration
The BLM will comply with greater sage-grouse management guidance provided in the ARMPAs. In addition, it will consider this issue during alternatives development and will consider developing design features to reduce impacts. The BLM will address this issue in the environmental consequences chapters of the PEISs, as appropriate.

Issue: How does grazing affect greater sage-grouse habitat?

Comment Summary
Commenters were concerned about the impacts of grazing on sage-grouse habitat and requested information on how grazing would affect sage-grouse populations, reproductive success, and habitat attributes including lek security, nesting and brood rearing cover, overall cover, and winter habitat. Commenters requested information as to how grazing has affected streams, springs, and meadows used by sage-grouse and suggested the BLM include water flow data in the PEISs.

Commenters wished to know whether the BLM works with livestock operators to use grazing as a tool to improve greater sage-grouse habitat.

Consideration
The BLM will consider this issue in the environmental consequences chapters of the PEISs, as appropriate.

Issue: How will the proposed projects affect special status plants?

Comment Summary
Some commenters requested that the PEISs disclose how the BLM plans to minimize or avoid negative impacts on slickspot peppergrass during vegetation treatments and fuel break construction.

Consideration
The BLM will consider developing design features to address this issue and will analyze impacts on special status plants in the environmental consequences chapters of the PEISs.

3.21.2 Applicable to the Fuel Breaks PEIS

Issue: How will fuel breaks affect sagebrush-dependent special status species, such as greater sage-grouse, populations and habitat? What measures will the BLM employ to provide protection to these species and habitats?

Comment Summary
Commenters requested that the Fuel Breaks PEIS provide a thorough analysis of the impacts of fuel break construction on sage-grouse habitat. Commenters requested that the BLM analyze the effects of fuels treatments, the effects of installing fuel breaks, and the effects of similar manipulation of fuels and landscape patterns. Such treatments are intended to reduce wildfire spread and burn intensities on greater sage-grouse habitat use, movement patterns, and population trends. They are intended to help minimize the potential detrimental effects of fire-risk reduction measures on the species.

Commenters were concerned that constructing fuel breaks in contiguous sagebrush areas may significantly damage and fragment habitat for sagebrush-dependent species, many of which require large unbroken expanses of sagebrush. This could lead to population declines. Commenters also noted that fuel breaks promote the growth of invasive species, which degrades sage-grouse habitat. Commenters requested that fuel breaks be prohibited within sage-grouse Priority Habitat Management Areas.

Commenters stated that fuel breaks that involve removal or modification of sagebrush should not be constructed near sage-grouse leks and that the location of every fuel break must be evaluated relative to seasonal habitat use. Commenters stated that fuel breaks that involve removal or modification of sagebrush should not be constructed near golden eagle nesting territories.

Commenters requested that the BLM explain how removal of sagebrush during the treatments will affect sage-grouse and other sage-dependent species. Another pointed out that restoring long-term landscape health would be more effective than fuel breaks for preserving greater sage-grouse habitat.

Consideration
The BLM will consider developing design features to address this issue and will analyze impacts on sagebrush-dependent special status species in the environmental consequences chapter of the PEIS.

3.21.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: How will fuels reduction and rangeland restoration activities affect greater sage-grouse populations and habitat? What information will be used to evaluate these impacts?

Comment Summary
Many commenters noted the importance of restoring sagebrush habitat for greater sage-grouse and requested information on how active restoration activities and vegetation treatments will affect greater sage-grouse habitats as part of the proposed projects. Commenters requested that the BLM conduct scientific studies and surveys to evaluate these impacts.

Some commenters suggested that the BLM focus removal of woody vegetation in areas that are a high priority for sage-grouse restoration (i.e., within a certain distance from leks). Commenters requested that the BLM disclose whether previous vegetation removal projects have benefited sage-grouse and that restoration activities would benefit sagebrush ecosystems and sage-grouse.

Commenters noted that projects that rely on invasive processes, such as insecticides, heavy equipment, and controlled burns, promote cheatgrass, which is a threat to sage-grouse habitat. Another stated that reduced fuel loads through targeted livestock grazing could indirectly benefit sage-grouse habitat.

Consideration
The BLM will consider this issue during alternatives development and will analyze impacts on greater sage-grouse in the environmental consequences chapter of the PEIS.

3.22 TRAVEL MANAGEMENT

3.22.1 Applicable to both PEISs

Issue: How will treatments affect road creation, footprint, maintenance, and width?

Comment Summary
Commenters were concerned that creation of new roads will increase the magnitude of disturbance by facilitating weed expansion, increasing watershed impacts, and intensifying habitat loss and fragmentation. Some commenters would like the BLM to provide detailed maps and analysis of existing roads and construction of new roads and corridors. Other commenters were concerned that maintenance of new and existing roads would cause widening over time due to roadside blading and vegetation removal.

Consideration
The BLM is not proposing changes to travel management as part of the PEISs. It will consider developing design features to reduce impacts on roads and will analyze impacts in the environmental consequences chapters of the PEISs. Site-specific impacts will be addressed at the local level during implementation.

3.22.2 Applicable to the Fuel Breaks PEIS
None.

3.22.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS
None.

3.23 TRIBAL INTERESTS

3.23.1 Applicable to both PEISs

Issue: How will potential actions under the two PEISs affect areas important to Native American Tribes for traditional uses? Will the BLM consult with Tribal governments?

Comment Summary
Commenters stated that the construction and maintenance of fuel breaks and fuels reduction treatments can affect areas important to Native American Tribes for traditional uses, such as food gathering or for ceremonial purposes, for example in pinyon-juniper woodlands.

Commenters noted that the BLM must consult with all affected Tribal governments in a thorough and meaningful fashion.

Consideration
The BLM will consider non-archaeological traditional use and other important heritage resources in the environmental consequences chapter of the PEIS. It will comply with applicable laws related to government-to-government consultation

3.23.2 Applicable to the Fuel Breaks PEIS
None.

3.23.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS
None.

3.24 VEGETATION RESOURCES

3.24.1 Applicable to both PEISs

Issue: What species of vegetation will be used in reseeding efforts? What is the BLM's management plan for removal, control, and prevention of invasive and noxious weeds? How will the BLM protect existing vegetation, including special status plant species?

Comment Summary
Commenters were concerned that disturbance to soils and existing vegetation may promote the growth of cheatgrass and other noxious weeds. Other commenters pointed out that removal of vegetation may cause hotter and drier soils with low shade, which could exacerbate noxious weed growth and cause further incidence of wildfire. Commenters requested that the BLM disclose the likely effects of fuel breaks and fuels reduction projects on the establishment and spread of nonnative, invasive species, such as cheatgrass. They also asked how the projects would affect the elimination of desirable native species, like sagebrush and native grasses.

Some commenters asked the BLM to conduct active restoration of cheatgrass/weed infestation areas and avoid loss of existing shrub cover; however, other commenters requested that only passive restoration take place in native communities and sage-grouse habitats. Commenters requested the sole use of native vegetation in seeding and restoration and that use of nonnative plants be prohibited.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to reduce impacts. It will analyze impacts of nonnative, invasive plants in the environmental consequences chapters of the PEISs.

Issue: What vegetation analyses will be used and how will the BLM decide where and when vegetation treatments will take place? To what extent will the BLM utilize herbicides?

Comment Summary
Commenters would like the PEIS to outline exact treatment protocols and analysis. Some commenters suggested that the BLM only use heavy equipment in grass areas. Commenters were concerned about the use of herbicides on public land and state that the use of herbicides should be greatly limited.

Commenters requested that the BLM eliminate aerial spraying of herbicides, limit other herbicide use to targeted application on individual plants, and eliminate any use of herbicides of known controversy, such as glyphosate and dicamba.

Consideration
The BLM will tier to its Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2007) and the Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2016) regarding the use and impacts of approved herbicides. In addition, the BLM will consider this issue during alternatives development, providing details appropriate for a programmatic-level document.

Issue: How will the BLM determine which pinyon-juniper areas require treatment?

Comment Summary
Commenters requested that fuels treatment projects be limited to Phase I pinyon-juniper woodlands. Others stated that conifer removal be limited to western juniper stands that have expanded due to fire suppression.

Consideration
The BLM will consider this issue during alternatives development.

Issue: What are the impacts associated with utilizing nonnative plant species?

Comment Summary
Commenters requested that the BLM analyze the beneficial and harmful uses of nonnative plants and prescribe protocols to minimize their harm to ecosystem health.

Consideration
The BLM will consider this issue in the environmental consequences chapter of the PEIS, as appropriate.

3.24.2 Applicable to the Fuel Breaks PEIS

Issue: What species of vegetation will be used in reseeding fuel breaks? What is the BLM's management plan for removal, control, and prevention of invasive and noxious weeds?

Comment Summary
Some commenters would prefer that the BLM create "green strips" by reseeding fuel breaks with nonnative species, such as kochia, to increase their effectiveness. Other commenters feared that seeding with nonnative species may lead to encroachment of nonnatives into surrounding native communities.

Commenters stated that without effective preparation and maintenance, fuel breaks can be a corridor for spreading weeds. There was further concern

among other commenters that mowing equipment or dirt firebreaks may increase the likelihood for spread and invasion of cheatgrass and other noxious weeds. Additionally, commenters suggested that fuel breaks provide a corridor for noxious plant seed dispersal by recreational vehicles.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to reduce impacts on vegetation communities. It will analyze impacts on vegetation and nonnative, invasive plants in the environmental consequences chapter of the PEIS.

Issue: In which vegetation communities will fuel breaks be created?
Commenters asked that fuel break locations be limited to areas dominated by big sagebrush and avoid areas dominated by black or low sagebrush.

Consideration
The BLM will consider this issue during alternatives development and will consider developing design features to reduce impacts on vegetation communities.

3.24.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What techniques will the BLM use to restore rangelands?

Comment Summary
Commenters were concerned about the BLM's categorization of encroaching conifers, compared with areas experiencing recolonization of pinyon-juniper woodlands. They suggested that conifer expansion is the result of recolonization of previously occupied sites and not true encroachment into new areas.

Commenters suggested landscape-scale review of patterns of transition in vegetation to ensure reduction treatments are in line with ecological trends. Some commenters stated that removing junipers may not be as effective in preventing wildfires as removing grazing livestock; in some cases grazing may increase cover by noxious weeds.

There was concern by some commenters that juniper reduction with heavy equipment may negatively affect surrounding native vegetation, soils, and wildlife. Some commenters asked that all available tools be used to remove pinyon-juniper woodlands. Other commenters asked that BLM prohibit removal of Class 3 pinyon-juniper woodlands.

Consideration
The BLM will consider this issue during alternatives development. It will address current conditions related to pinyon-juniper woodlands in the affected environment chapter of the PEIS and will analyze impacts in the environmental consequences chapter of the PEIS.

Issue: How will the BLM determine which pinyon-juniper areas require treatment?

Comment Summary
Commenters were concerned about the BLM's categorization of encroaching conifers compared with areas experiencing recolonization of pinyon-juniper woodlands. Commenters suggested that conifer expansion is the result of recolonization of previously occupied sites and not true encroachment into new areas. Commenters suggested landscape-scale review of patterns of transition in vegetation to ensure reduction treatments are in line with ecological trends.

Some commenters stated that removal of junipers may not be as effective in preventing wildfires as removal of grazing livestock, and in some cases grazing may increase cover by noxious weeds. There was concern by some commenters that juniper reduction with heavy equipment may negatively affect surrounding native vegetation, soils, and wildlife. Some commenters asked that all available tools be used to remove pinyon-juniper woodlands.

Other commenters asked that the BLM prohibit removal of Class 3 pinyon-juniper woodlands.

Consideration
The BLM will consider this issue during alternatives development. It will address current conditions related to pinyon-juniper woodlands in the affected environment chapter of the PEIS and will analyze impacts in the environmental consequences chapter of the PEIS.

3.25 VISUAL RESOURCE MANAGEMENT

3.25.1 Applicable to both PEISs

Issue: How will fuel break and fuel reduction vegetation projects affect visual resources?

Comment Summary
Commenters were concerned about the visual impacts of fuel breaks and fuel reduction projects. Commenters noted that projects that alter vegetation can degrade visual quality. A specific concern was that thinning of trees will make grazing infrastructure more visible. Additional concerns included the visual impacts of possible stumps, burn marks, and cheatgrass burn piles from fuel treatments.

Commenters requested that the PEIS describe mitigation protocols designed to address the impacts of fuel break construction and maintenance on visual resources.

Consideration
The BLM will consider developing design features to address this issue and will analyze impacts on visual resources in the environmental consequences chapters of the PEISs.

3.25.2 Applicable to the Fuel Breaks PEIS

Issue: What are the visual impacts that fuel breaks will have on recreation resources? How will BLM mitigate these impacts?

Comment Summary
Commenters were concerned about the visual impacts of fuel breaks created along trails and roads, and they asked that the PEIS analyze visual impacts that fuel breaks will have on recreation resources.

Consideration
The BLM will consider this issue in the environmental consequences chapter of the PEIS, as appropriate.

3.25.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.26 WATER RESOURCES

3.26.1 Applicable to both PEISs

Issue: How will the PEISs affect water resources and how will the BLM reduce these impacts?

Comment Summary
Commenters requested that disturbance be limited throughout watersheds to protect water, soils, and cultural resources. Commenters stated that the BLM should fully protect riparian and all freshwater sources, excluding them from fuels treatments and routing fuel breaks away from them. Other commenters requested that the BLM identify intermittent versus perennial versus ephemeral reaches and assess how the projects would affect them. Commenters stated that fuel treatments may lead to removal of shade and subsequent temperature increase in streams, increased sedimentation, and herbicide pollution and drift.

Commenters requested that watershed or aquatic habitat restoration be used where impairment exists.

Consideration
The BLM will consider this issue during alternatives development and may develop design features to reduce impacts. The BLM will analyze the impacts on water resources in the environmental consequences chapters of the PEISs, as appropriate.

Issue: What are the impacts from climate change on water resources?

Comment Summary
Commenters wrote that climate change is likely to exacerbate the impacts of other stressors on water resources, resulting in adverse effects on fragile watersheds and sustainable flows.

Consideration
The BLM will consider the impacts associated with climate change in the environmental consequences chapters of the PEISs, as appropriate.

Issue: What are the impacts from junipers on water resources during proposed treatments?

Comment Summary
Commenters indicated that the hydrologic impacts of junipers may be miscalculated; once the root zone is recharged during the winter, the trees have little impact on the annual discharge of water to streams.

Consideration
The BLM will consider the impacts associated with this issue in the environmental consequences chapters of the PEISs, as appropriate.

3.26.2 Applicable to the Fuel Breaks PEIS

Issue: How will fuel breaks be implemented to avoid impacts on water quality and water flow?

Comment Summary
Commenters requested that the BLM analyze water quality impacts from pinyon-juniper removal and livestock removal.

Commenters stated that fuel breaks may increase sedimentation in waterways and disrupt hydrologic function. This disruption would result from runoff modification and the concentration of flows within the fuel breaks.

Commenters requested that fuel breaks be designed to avoid adverse impacts on surface water resources.

Commenters expressed concern that fuel breaks would modify or interfere with the natural flow of water through the landscape.

Consideration
The BLM will consider developing design features to address this issue. It will analyze the impacts on water quality and water flow in the environmental consequences chapter of the PEIS, as appropriate.

3.26.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

Issue: What are the impacts of woodland removal and herbicide use for fuels reduction on water quality (surface and groundwater)?

Comment Summary
Commenters requested the PEIS analyze the impacts of woodland removal on hydrological functioning in watersheds and groundwater basins.

Other commenters requested that the BLM analyze the impacts from herbicide use on watersheds and groundwater basins.

Commenters stated that tree cover may improve water quality, and impacts on water quantity from juniper may have been miscalculated. Commenters requested that small-scale juniper removal be employed rather than landscape removal to improve groundwater recharge.

Consideration
The BLM will tier to the BLM's Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2007) and the Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (2016) regarding the use and impacts of approved herbicides. The BLM will address this issue in the environmental consequences chapter of the PEIS, as appropriate.

Issue: How will these PEISs improve water infiltration and groundwater flow?

Comment Summary
Commenters requested that the BLM utilize these PEISs to improve water infiltration and groundwater recharge, reduce soil erosion, and improve vegetation and wildlife habitat.

Consideration
The BLM will consider this issue in the environmental consequences chapter of the PEIS, as appropriate.

3.27 WILDLAND FIRE MANAGEMENT

3.27.1 Applicable to both PEISs

Issue: What tools will the BLM use to reduce the risk of wildland fire?

Comment Summary
Commenters held that all available tools and resources must be utilized, including firebreaks and fuels reduction.

Consideration
The BLM will consider tools to reduce the risk of wildland fire during alternatives development.

Issue: What are the potential effects of long-term changes in weather and atmospheric conditions on wildfire severity and frequency?

Comment Summary
Commenters asked the BLM to discuss and analyze long-term climate trends and how they may affect fire frequency and intensity. Commenters suggested the PEISs examine the possibility that extreme temperatures, low humidity, and high winds might outweigh fuel presence and composition as factors for fire severity and behavior.

Consideration
The BLM will consider this issue in the affected environment chapters of the PEISs, as appropriate.

3.27.2 Applicable to the Fuel Breaks PEIS

Issue: What is the decision-making process and criteria for the location and extent of fuel breaks? How will fuel breaks be managed?

Comment Summary
Some commenters stated that the BLM should proactively implement range-wide fuel breaks across the Great Basin. Commenters requested that fuel breaks not be proposed within resilient/resistant landscapes, and be constructed on and around existing infrastructure, such as roads or preexisting disturbances. Commenters stated that it is vital for the BLM to employ regular and active treatment of fire-resistant areas to ensure that these areas do not add to the risk of catastrophic wildfire.

Consideration
The BLM will consider developing design features to reduce impacts associated with fuel break locations and management.

3.27.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.28 WILD HORSES AND BURROS

3.28.1 Applicable to both PEISs

Issue: How do wild horses and burros affect the spread of noxious weeds?

Comment Summary

Commenters noted that wild horses and burros further the spread of noxious weeds and the resulting increase in wildfire occurrence.

Consideration

The BLM will consider developing design features to reduce wild horse and burro impacts on fuel breaks, fuels reduction, and rangeland restoration investments.

Issue: Will the PEISs address the role of wild horse and burros in vegetation management? Will managing wild horse populations be included in fuel breaks and fuels reduction planning?

Comment Summary

Commenters noted that wild horses pose a threat to vegetation management actions within Herd Management Areas and suggested that the BLM identify appropriate measures to be implemented for treatments located in and near Herd Management Areas as part of the PEISs.

Consideration

The BLM will consider developing design features to reduce wild horse and burro impacts on fuels management investments.

3.28.2 Applicable to the Fuel Breaks PEIS

None.

3.28.3 Applicable to the Fuels Reduction and Rangeland Restoration PEIS

None.

3.29 SITE-SPECIFIC COMMENTS

3.29.1 Air Quality

Commenters suggested that wood should be harvested and turned into long-lived products.

3.29.2 Alternatives

Commenters requested that the BLM propose specific treatment areas and methods in the PEISs.

3.29.3 Fish and Wildlife

Some commenters requested surveys and inventories of certain sensitive wildlife species, such as the ferruginous hawk, across the proposed project area.

3.29.4 Impacts: Direct, Indirect, and Cumulative

Commenters requested that the BLM calculate the current fence density and that it map and thoroughly analyze the configuration of fences in relation to all sensitive species' seasonal habitats.

Commenters expressed concerns over the potential size of the BLM's projected fuel breaks and requested that the size and scope of any fuel breaks in the Great Basin be fully analyzed and disclosed.

3.29.5 Lands and Realty

Some commenters expressed support for using existing and orphan rights-of-way to create fuel breaks in order to minimize disturbance to more pristine areas. Other commenters asked whether private operators will be incentivized to use rights-of-way corridors as fuel breaks. Commenters pointed to many abandoned rights-of-way as opportunities for fuel breaks.

Some commenters were concerned that creating fuel breaks along roads may change the nature of those roads under provisions of Idaho Code (40-203), as public funds determine right-of-way.

3.29.6 Livestock Grazing

Commenters requested that land health assessments take place before any BLM treatments.

Commenters requested that science and site-specific data be used to determine the presence of old-growth or historic juniper before using targeted grazing.

3.29.7 Post-Fire Restoration and Maintenance

Commenters suggested creating and implementing criteria for determining restoration feasibility at the local level, including climatic and monitoring data at appropriate time scales.

3.29.8 Recreation

Commenters requested that the BLM maintain existing OHV and other travel access as fuel breaks are made. Others requested that the BLM provide new OHV access and opportunities to replace any closure of existing OHV trails. Commenters suggested seasonal closure of roads and trails to prevent damage during wet seasons.

3.29.9 Relationship with other Federal, State, or Local Policy

Commenters felt it was unacceptable to tier off the PEISs with categorical exclusions, and an environmental assessment should be the minimum NEPA analysis.

3.29.10 Socioeconomics

Commenters requested that the PEISs include analyses of impacts on socioeconomics, particularly on a local level.

Some commenters noted the potential for the proposed projects to stimulate local economies, keeping project dollars within affected counties when possible by providing local economic opportunities.

Commenters asserted that a stable economic environment should be sustained and enhanced so that ranchers may assist in the conserving the rangelands. Another suggested that economic impacts at the local level could be minimized by careful project planning to allow projects in certain areas if closures are needed in other areas.

3.29.11 Soil Resources

Commenters stated that the BLM must quantify project-induced losses in soil productivity, potentially leading to serious long-term reduction in vegetation growth.

Other commenters requested that the BLM use the Natural Resources Conservation Service (NRCS) ecological site descriptions associated with specific soil map units mapped in the NRCS service soil survey for the project area. They asked that the BLM compare the NRCS potential natural community description, which indicates whether pinyon-juniper communities should be on the site, with current site conditions.

3.29.12 Special Status Species

Commenters suggested that the BLM conduct site-specific baseline inventories for all rare and sensitive biota for consideration in the impact analysis.

Commenters suggested that the BLM conduct field surveys of rare plants following established protocols and provide an inventory of all plant species encountered in the surveys. Surveys should be conducted over several seasons to accurately evaluate on-site conditions.

Commenters also requested that the BLM provide detailed mapping and analysis of all greater sage-grouse habitat categories and leks. They requested information on lek activity, location, and size.

Commenters requested that the BLM estimate the amount of habitat that would be directly destroyed by fuel breaks and the amount of nesting habitat that would fall within the 5-kilometer (3.1-mile) buffer.

3.29.13 Tribal Interests

Commenters stated that each project tiered off the PEISs must contain site-specific impacts analysis and site-specific consultation with local Tribes.

Commenters requested that the BLM survey all affected areas for archaeological resources. This is because only a small portion of public lands have been surveyed and some prior surveys are not adequate by today's standards. Because petroglyphs are often difficult to see, commenters requested that survey crews include persons with experience in rock art discovery and recording.

3.29.14 Vegetation Resources

Commenters requested populations of noxious weeds to be mapped, including cheatgrass, medusahead, and knapweed.

Some commenters suggested that the BLM incorporate current site-specific potential, range of variability, thresholds, and soil bioassays into planning and management.

3.29.15 Water Resources

Commenters requested that impaired and high-quality waterbodies be identified and considered when selecting potential treatment areas. Commenters requested a stormwater pollution prevention plan be developed for larger fuels breaks and fuels reduction projects.

Commenters wrote that reintroducing beavers to creeks would keep the stream bottoms green and raise the humidity of the air nearby. Commenters stated that a string of beaver ponds going up a drainage is a permanent fuel break and may serve as refuges for all animals during a fire; it may trap sediment and the debris that washes down from burns to protect water quality.

3.30 Out of Scope Comments

3.30.1 Air Quality

Commenters asked that after a wood harvest, new young trees should be planted to reduce carbon dioxide emissions from deforestation.

Other commenters stated that deforestation causes carbon dioxide to linger in the atmosphere and causes the greenhouse effect.

3.30.2 Alternatives

Commenters requested a restoration alternative, under which the BLM would not undertake any vegetation treatments but instead would protect habitat from human disturbances.

3.30.3 Economics

Commenters requested that the BLM reveal the sources of funding for the projects. They suggested that funding be leveraged whenever possible to maximize project implementation. Others suggested that for each project, the BLM set aside funds equivalent to the cost of redoing the project, if the project fails to restore native vegetation.

Some commenters suggested prioritizing economically viable actions with the highest probability of success. Commenters asked whether funding would be available or increased for such activities as seed collection and research into restoration practices. Another suggested activity was using existing systems (ranchers and wildland fire crews) to create more resilient plant communities. Commenters asked if local fuels managers would have increased flexibility, control, and budgets.

Commenters pointed out that if motorized vehicle use is restricted, then fees associated with motorized vehicle use should not be used in the project area. Commenters further suggested that motorized funds used previously in the area should be returned for use on motorized projects.

Commenters asked how the potential cost/benefit of areas affected by proposed actions would be evaluated given that elevation, precipitation, and soil type are key elements for success.

3.30.4 Fish and Wildlife

Commenters requested a detailed analysis of the effects of deforestation on wildlife.

3.30.5 FIAT Assessments

Commenters requested that the BLM provide pertinent local information before selecting which projects to prioritize.

3.30.6 Forestry and Woodland Products

Some commenters expressed an opposition to logging, with concern that this would lead to deforestation. Other commenters supported the idea of using logging to reduce fuels, noting that logging worked in the past.

Commenters suggested letting loggers harvest beetle-infested trees. They noted that if trees are usable, loggers could pay to cut them down, and if not they could be used as biofuel or wood pellets.

Commenters also offered thoughts on who could remove forested vegetation, noting that reinstating the Civilian Conservation Corps or allowing timber sales on public land would offer the means to remove trees for fuels reduction. Commenters suggested implementing a rotation plan for logging in the next few years that allows the public to claim firewood from slash piles.

3.30.7 Impacts: Direct, Indirect, and Cumulative

Commenters recommended that the BLM analyze and describe the risk of fuel breaks facilitating future development; examples are additional roads, trail and camping disturbances, rights-of-way requests, and visual standards reductions.

Commenters stated that the BLM must consider the likely impacts on native wildlife and vegetation, should grazing increase post-treatment.

3.30.8 Livestock Grazing

Commenters requested that current grazing practices be analyzed and compared with past years when fires were manageable. The purpose would be to determine if the level of grazing may be causing more fuel for wildfires.

Other commenters suggested that large reference areas excluding grazing in the different subsets of sagebrush steppe ecosystems be created to better understand the effects of fire and other events on a sagebrush community that has not been grazed.

Commenters requested that the BLM create short- and long-term monitoring sites in areas that are receiving significant livestock use, based on site visits with interested parties and use patterns.

Commenters requested the development of site-specific, mandatory, grazing control actions,. They requested that the BLM ensure annual compliance with grazing permits. This would be done to protect public investment in the proposed projects and to aid in buffering lands from adverse impacts of climate change.

Commenters requested that the BLM include grazing livestock in their definition of healthy rangeland, as is standardized in the applicable Rangeland Health Standards. Commenters requested that an upland trampling standard be applied to limit disturbance of soils, microbiotic crusts, and native plants, including seedlings, as a term and condition of livestock grazing permits.

Commenters stated that no calving/lambing operations should be allowed on public lands to control large predators and nest and egg predators for avian species.

Commenters requested an analysis of the effects of cattle grazing on the ecosystem and a consideration of retiring permits to improve the ecosystem. Some requested both a reduction in grazing levels from the actual use that has been occurring, coupled with the seasonal avoidance of habitats for sensitive species. Other commenters stated that the BLM should consider eliminating grazing, due to the degree of habitat loss, degradation, and fragmentation.

Commenters stated that effective policies and management of livestock grazing programs have the potential to maintain habitat for a variety of species. Such procedures could also protect and restore the sagebrush steppe ecosystem when decisions are made at an allotment level.

Commenters suggested that increasing grazing permit flexibility, such as periods of use and other current management processes, would allow managers and grazers to make the best use of grazing to benefit the livestock operator and meet fuels reduction goals.

Some commenters requested increasing animal unit months in areas meeting or exceeding land health standards to aid in fuels reduction. Other commenters suggested that carefully structured allotment management plans are an economical solution for reducing fuel loading. Commenters suggested integrating targeted grazing into updated grazing permits to gain support and cooperation from managers and grazers.

Other commenters stated that grazing causes pinyon-juniper expansion, and the BLM must consider a full range of options for slowing or reversing expansion, including reducing grazing. Commenters requested that the BLM remove livestock and reintroduce fire to reestablish a mosaic of fire-driven seral development.

Some commenters requested that livestock management practices be revised to ensure sufficient fine fuels are available when a normal fire return interval can be established and maintained.

Commenters requested that the BLM improve the ability to predict fuel loads.

Commenters requested that the BLM disclose the actual use levels across the affected grazing allotments in occupied greater sage-grouse habitats and how this compares with permitted use. They stated that minimizing or removing grazing disturbance is crucial to maintaining ecological integrity of fuels reduction.

3.30.9 Post-Fire Restoration and Maintenance

Commenters identified the need for a post-fire rehabilitation plan, based on site-specific data. This is because post-fire restoration is equally critical to stabilize the ecological integrity of the site immediately after fire containment. Commenters requested that the BLM catalog, map, and summarize post-fire rehabilitation and emergency stabilization and rehabilitation actions undertaken by the BLM over the past 50 years across all offices.

Some commenters suggested that the post-fire restoration plan be based on available tools, including seeding native and desirable adapted species and mimicking natural plant spacing patterns. Commenters noted the importance of employing regular and active treatment in resilient areas to ensure that, in the case of a fire, these areas do not add to the risk of catastrophic wildfire.

Commenters expressed concern that the BLM has not adequately addressed post-fire fuel loads, which are the result of failure to graze, lack of budget to treat chemically, or lack of flexibility to treat with grazing.

Commenters requested information on whether wildfire burns would be actively or passively managed. Another suggested that the BLM require livestock to be removed for a minimum of 10 to 20 years following a wildfire. This commenter also suggested that the BLM implement specific recovery criteria for

native grasses, forbs, shrubs, and microbiotic crusts that must be applied and attained before grazing can resume.

Commenters suggested that post-fire treatments, such as reseeding burnt areas with native and desirable vegetation and maintaining optimal vegetation conditions, will be more effective for preventing large-scale wildfires.

Commenters requested details regarding how long-term maintenance will be funded.

Commenters pointed out that restoration projects are usually unsuccessful if grazing is allowed before restoration goals and objectives have been met. Commenters requested that the need and requirements for rest from grazing after treatments be analyzed in the PEIS.

3.30.10 Purpose and Need

Some commenters stated the need for specific information related to the implementation of fuel breaks and fuel reduction projects. For instance, there is no description of how projects will be prioritized.

3.30.11 Public Health and Safety

Commenters suggested that the BLM provide signs with a number to call in case of a wildfire.

Commenters stated that the Fuel Breaks EIS must consider how fuel breaks may give landowners and firefighters a false sense of security, which may in turn result in serious injury or death.

3.30.12 Recreation

Commenters requested that the BLM maintain OHV access during restoration, noting that all OHV vehicles are required to have a spark arrestor before being ridden on public lands. Commenters noted that OHV riders may even be able to help alert the BLM early if a wildfire has started.

Some commenters requested that travel management decisions or recreation restrictions not be considered in the PEISs. There was concern that the BLM has not completed adequate analysis or compiled data on motorized recreation. Commenters stated that an updated travel plan should be a priority.

3.30.13 Relationship with other Federal, State, or Local Policy

Commenters were concerned that targeted grazing is not economically viable for ranchers and would require additional subsidies for the livestock industry.

3.30.14 Soil Resources

Some commenters stated that NRCS ecosites are speculative and erroneous.

Commenters stated that the BLM must quantify grazing-induced losses in soil productivity, potentially leading to serious long-term reduction in vegetation growth.

Commenters stated that there are impacts from cattle grazing and other treatment operations on microbiotic crusts.

3.30.15 Special Status Species

Commenters requested that the BLM eliminate threats associated with livestock grazing from areas that are a high priority for sage-grouse restoration.

3.30.16 Water Resources

Commenters stated that impacts on water quantity should be assessed for surface and groundwater resources, including perennial flow. The commenters stated that reducing water removal from springs would improve riparian vegetation.

Commenters stated that the water cycle is affected by deforestation, which reduces the content of water in the soil and groundwater, as well as atmospheric moisture. The commenters stated that deforestation reduces soil cohesion so that erosion, flooding, and landslides ensue.

Commenters wrote that shrinking forest cover lessens the landscape's capacity to intercept, retain, and transpire precipitation.

Commenters stated that increased and earlier runoff would result from deforestation of any type, and this type of impact needs to be quantified.

3.30.17 Wildland Fire Management

Commenters recommended investment and use of resources for increases in rangeland fire personnel, reclaiming and closing roads, establishing no-surface occupancy areas and exclusion areas, and reducing or eliminating livestock grazing.

Other commenters requested that the BLM not conduct new fuel breaks or vegetation treatment but instead rely on additional firefighting resources and increasing incident attack centers in some areas. Some commenters stated that outcomes from alternative management and control decisions may achieve similar preventative and restorative outcomes. Commenters asked the BLM to increase fire suppression probability by locating personnel closer to important habitats and increasing aerial detection.

Additionally, commenters asked that the BLM identify and disclose the reasoning for regional differences among firebreak density, extent, and management.

3.30.18 Wild Horses and Burros

Commenters requested that managing wild horse populations be included in fuel breaks and fuels reduction planning. They requested that the PEISs provide flexibility for managers to gather more frequently if necessary to maintain herds within appropriate management levels.

Commenters requested that the PEIS include the cost of restoring wild horses and burros, suggesting that this would be an affordable fuels reduction alternative.

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CHAPTER 4
FUTURE STEPS

4.1 FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BLM's environmental analysis process is to develop draft management alternatives and design features for each PEIS based on the issues presented in Chapter 3 of this scoping report. These alternatives and design features will address issues identified during scoping and will meet goals and objectives to be developed by the BLM's interdisciplinary team. In compliance with NEPA, Council on Environmental Quality regulations, and BLM regulations and guidance, alternatives should be reasonable and able to be implemented. The BLM will also meet with cooperating agencies and interested tribes; the BLM is available and open to meeting with community groups and individuals upon request. A detailed analysis of the alternatives and design features will be completed, and the BLM's preferred alternative will then be identified.

The analysis of the alternatives and design features will be documented in a Draft PEIS. The BLM anticipates preparing the Draft Fuel Breaks PEIS first, with the Draft Fuels Reduction and Rangeland Restoration PEIS shortly thereafter. Although the BLM welcomes public input at any time during the environmental analysis process, the next official public comment period will begin when the Fuel Breaks Draft PEIS is published, which is anticipated in winter 2019. The availability of the draft document will be announced via a Notice of Availability in the *Federal Register*, and a 60-day public comment period will follow. Public meetings will be held throughout the Great Basin during the comment period. The same process will occur for the Draft Fuels Reduction and Rangeland Restoration PEIS.

At the conclusion of the public comment period, the Draft PEIS will be revised, followed by publication of the Final PEIS. The availability of the Final PEIS will be announced in the *Federal Register*. The date the notice appears in the *Federal Register* initiates the required 30-day availability period. Although this is not a formal public comment period, the BLM may receive comments. If there are

comments on the Final PEIS, the BLM will determine if they have merit (for example, if the comments identify significant new circumstances or information relevant to environmental concerns and bear upon the proposed action, or if the comments note a correction to be addressed). Any comments received may be addressed in the Record of Decision (ROD).

The BLM will prepare the ROD to document the selected alternative and any accompanying mitigation measures; the ROD will be signed by the authorizing official. No action concerning the proposal may be taken until the ROD has been issued, except under conditions specified in Council on Environmental Quality regulations 40 CFR 1506.1.

4.2 CONTACT INFORMATION

The public is invited and encouraged to participate throughout the environmental analysis process for the Fuel Breaks PEIS and Fuels Reduction and Rangeland Restoration PEIS.

Anyone wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may send a request to GRSG_PEIS@blm.gov or mail a request to:

Jonathan Beck
BLM Idaho State Office
1387 S. Vinnell Way
Boise, ID 83709
Fax: 208-373-3805

Please provide name, mailing address, and email address, as well as the preferred method to receive information. Before submitting written comments regarding a NEPA action, be advised that your entire comment—including personally identifiable information (such as your address, phone number, and email address)—may be made publicly available at any time. While you can request that your personally identifiable information be withheld from public review, we cannot guarantee that we will be able to do so.