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Bureau of Land Management
Winnemucca Field Office, Nevada

July 2005



Winnemucca Resource Management Plan Scoping Summary Report



SUMMARY

The United States Department of the Interior, Bureau of Land Management (BLM) is preparing a Resource Management Plan (RMP) for public lands administered by the Winnemucca Field Office (WFO). The RMP will replace the Sonoma-Gerlach and Paradise-Denio Management Framework Plans, each completed in 1982 and collectively amended in 1999. A separate RMP was completed in July 2004 for a portion of the WFO planning area – the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area. This portion of the *planning area* (approximately 1,015,216 acres) is not included in the BLM *decision area* for this RMP. Public involvement is a vital component of the Federal Land Policy and Management Act and the National Environmental Policy Act for vesting the public in the decision making process and allowing for full environmental disclosure. Public involvement for the WFO RMP is being conducted in four phases:

- Public scoping prior to National Environmental Policy Act analysis to determine the scope of issues and alternatives to be addressed in the RMP/ Environmental Impact Statement (EIS);
- Public outreach via newsletters, news releases, newspaper advertisements;
- Collaboration with federal, state, and tribal governments; and
- Public review and comment on the Draft RMP/ EIS, which analyzes likely environmental effects and identifies the preferred alternative.

This report documents the results of the first three phases of the public involvement process.

PUBLIC SCOPING ACTIVITIES

The scoping process for the WFO RMP began on March 25, 2005, with the publication of a notice of intent in the *Federal Register*. The purpose of the

notice of intent was to inform the public of the BLM's intent to develop an RMP for those BLM-managed lands within the Winnemucca Field Office, which comprise the RMP decision area (Appendix A). The notice of intent also solicited public comments. The public comment period ended on May 24, 2005.

In March 2005, a WFO RMP/EIS project web site was launched to serve as a clearinghouse for project information during the planning effort. The web site, at www.nv.blm.gov/wformp, provided a link for site visitors to submit comments about the project. Due to security issues and upgrades, the web site was temporarily shut down in April 2005 and remained so through the end of the scoping period. The public was urged in public notices and during the scoping meetings to use other means to provide their comments.

On March 23, 2005, a newsletter was mailed to over 1,600 individuals and organizations that have been interested in or participated in other activities hosted by the Winnemucca Field Office. The purpose of this newsletter was to inform them of the WFO RMP planning effort, the location of the open houses, and the opportunity to comment. In addition, the newsletter gave the public various methods to submit their comments including a dedicated e-mail address (comments@wformp.com), via fax (775-623-1503), and the BLM WFO postal address to mail comments. Newspaper advertisements and news releases also were published for the same purposes and to provide contact information. A display advertisement was published in the *This & That* Gerlach newsletter on April 25, 2005; *Humboldt Sun* on April 26, 2005; and *Reno Gazette-Journal* and *Lovelock Review-Miner* on April 28, 2005.

Open houses were held in Winnemucca, Lovelock, Gerlach, and Reno, Nevada, on May 2, 3, 4, and 5, 2005, respectively. These open houses gave the public an opportunity to receive information, ask questions, and provide input. Fact sheets and handouts about the project and a map of the planning area were provided, as was a list of the preliminary planning criteria and anticipated key issues related to the project. Single-page summaries of each resource issue were provided as convenient references to take from the meetings. Site and resource maps were displayed illustrating the current situation and management techniques practiced among different resources and land areas. A slide presentation highlighted key issues and summarized the planning process. Prominent, handicap-accessible local facilities in informal settings were chosen as venues to encourage broad participation. These venues included a convention center and two community centers. Eighty-one people signed in at the open houses. One visitor attended three meetings, which means at least 79 different people were present overall.

In addition to the public open houses, the BLM gave presentations on the WFO RMP planning effort to the following groups:

- Humboldt County Commissioners on March 7, 2005;
- Pershing County Commissioners on March 16, 2005;
- Sierra Front-Northwestern Great Basin Resource Advisory Council on April 28, 2005;
- City of Winnemucca on May 3, 2005;
- Humboldt County Development Authority on May 10, 2005; and
- Two Native American tribal meetings on May 24 and May 26, 2005.

PUBLIC SCOPING RESULTS

Comments were submitted in the form of letters, postage-paid comment forms, faxes, e-mails, and hand deliveries at the scoping meetings. Comments submitted and received in written form were considered in this scoping summary report. Although May 24, 2005 was designated as the end of the official scoping period, all written submissions postmarked through June 19, 2005, are included in this analysis. Only one comment has been received after this date. Due to the lateness of the comment receipt, the BLM was unable to incorporate it into the Comment Summary analysis discussed in Section 2; however the comment was evaluated in Section 3 and Appendix D. This and any other comments received during the RMP process will be considered during alternative formulation and project planning.

Most submissions contained multiple comments on various topics. A total of 452 comments were made in the 58 written submissions received. All information gathered during the scoping period will be evaluated, verified, and incorporated into the RMP and EIS, as appropriate.

All submissions were read and evaluated to determine their content. Since most submissions had several comments often pointing to more than one opportunity or concern, a method was developed to systematically track and statistically describe all discrete comments received. Separate comments within a lengthy letter or comment form were first logged and categorized by topic. The discrete comments were then entered into a database to assist with the analytical review. The database is structured to organize comments by planning theme; geographical location of the commentor; and affiliation of the commentor. These identifiers can be queried and tallied to provide quantitative information on larger concerns and to pinpoint regions or groups providing the most feedback.

The majority of written submissions were from individuals (60 percent), followed by organizations (21 percent). Most comment letters and individual comments received from sources within the WFO RMP planning area came from Washoe County. Only five percent of the comment letters received were from Nevada counties outside of the WFO planning area, while 22

percent came from states other than Nevada (primarily Idaho). The majority of comments focused on issues related to Recreation, Access, and Transportation (14 percent); Mining and Other Commercial Uses (14 percent); Livestock Grazing (13 percent); and Wildlife Habitat and Special Status Species (12 percent).

ISSUE SUMMARY

In March 2004, the BLM developed a Pre-Plan Analysis and Project Management Plan to commence the planning process and summarize the purpose and need of the RMP. This document also highlighted preliminary planning criteria and the 21 anticipated planning issues identified by the BLM interdisciplinary team. All comments received during the public scoping period fell into the 21 preliminary issue categories.

All comments received from the scoping period were compiled and distilled to identify prominent issues. Comment sources included the preliminary issues identified in the BLM's Pre-Plan Analysis; meetings with individuals, organizations, agencies, and tribal representatives; and written comments received during the formal public scoping period. The 21 planning issues, along with subsequently identified issues, planning criteria, and other information (such as occurrence and development potential for minerals), were further refined into nine planning issue themes:

1. Recreation, Access, and Transportation
2. Land Tenure and Use Management
3. Fire Management, Vegetation Management, and Exotic Species
4. Wildlife Habitat and Special Status Species
5. Mining and Other Commercial Uses
6. Livestock Grazing
7. Special Designations
8. Wild Horses and Burros
9. Cultural Resources and Traditional Values

While not all comments and concerns are included in the planning issues, appropriate comments will be addressed by the RMP and will be considered in the effects analysis. However, they will not have overriding influence on the development of alternatives. Comments were categorized into the nine planning issue themes and issue statements were formulated as follows.

1. How will transportation and recreation be managed to improve public access, protect natural and cultural resources, reduce user conflicts, and provide motorized and non-motorized recreation opportunities?

2. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
3. What actions or restrictions will be needed to maintain or improve natural resource values, reduce dangerous fuel loads, control and prevent noxious weeds and other undesirable plant species, and reduce risk of crossing ecological thresholds?
4. How will uses and land management activities be managed to maintain and improve terrestrial and aquatic habitats in a scattered land ownership pattern while maintaining multiple-use land management?
5. How will the BLM manage mining and other commercial uses (other than livestock grazing) on public lands while protecting natural and cultural resources? How will management of BLM lands affect the social and economic resiliency and sustainability of local economies?
6. How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and/or using natural and cultural resources?
7. Where are special designations appropriate to protect unique resources?
8. What is the appropriate management level and other management measures to protect natural and cultural resources while protecting the health and safety of these wild horse and burro communities? Where should Herd Management Area boundaries be adjusted?
9. How can the BLM use proactive management, tribal cooperation, and land tenure tools to identify, protect, and conserve cultural resources? How can these values be incorporated into other management activities?

These planning issues and associated statements, planning criteria, and other information collected in the early planning and scoping phases of the RMP process will be used by the BLM and cooperators to help formulate a reasonable range of alternative management strategies that will be analyzed during the planning process.

FUTURE STEPS

Although the BLM welcomes public input at any time during the project, the next official public comment period will open upon publication of the Draft RMP/EIS, which is anticipated in Summer 2007. The draft document will be widely distributed to elected officials, regulatory agencies, and members of the public who have requested to remain on or be added to the official WFO

RMP/EIS project mailing list. It will also be available on the project web site (www.nv.blm.gov/wformp) when it is back online. The availability of the draft document will be announced in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will again be held in four locations throughout the WFO planning area during the 90-day period.

At the conclusion of the public comment period, the Draft RMP/EIS will be revised. A Proposed RMP/Final EIS will then be published. The availability of the proposed document will be announced in the *Federal Register*, and a public protest period will follow. Concurrently the Governor of Nevada will review document for consistency with approved state or local plans, policies, or programs.

At the conclusion of the public protest period and Governor's consistency review, the BLM will resolve all protests and any inconsistencies, and the approved RMP and Record of Decision will be published. The availability of these documents will be announced in the *Federal Register*.

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LIST OF ACRONYMS

Acronym	Definition
ACEC	Areas of Critical Environmental Concern
AML	appropriate management level
ATV	all-terrain vehicle
BLM	United States Department of the Interior, Bureau of Land Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
HMA	Herd Management Areas
MFP	Management Framework Plan
NEPA	National Environmental Policy Act
NDOW	Nevada Department of Wildlife
NHPA	National Historic Preservation Act
NOI	Notice of Intent
PRCI	Properties of Cultural and Religious Importance
RAC	Resource Advisory Council
ROW	right-of-way
RMP	Resource Management Plan
USFWS	US Fish and Wildlife Service
USFS	US Forest Service
WFO	Winnemucca Field Office
WSA	Wilderness Study Area

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SECTION 1

INTRODUCTION

The United States Department of the Interior, Bureau of Land Management (BLM) is preparing a Resource Management Plan (RMP) for public lands administered by the Winnemucca Field Office (WFO) in Nevada. The RMP will replace the 1982 Sonoma-Gerlach and Paradise-Denio Management Framework Plans and one land use plan amendment entitled Paradise-Denio and Sonoma-Gerlach Management Framework Plan-Lands Amendment (January 1999).

1.1 OVERVIEW OF THE NATIONAL ENVIRONMENTAL POLICY ACT AND PUBLIC INVOLVEMENT PROCESS

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, federal agencies are required to consider the environmental impacts of their proposed actions prior to taking action. Actions that are subject to NEPA include those involving federal funding, requiring federal permits, involving federal facilities and equipment, or affecting federal employees. The actions that would be proposed by the BLM as part of the RMP being developed for the Winnemucca Field Office are subject to the requirements of NEPA. Pursuant to NEPA, the BLM will prepare an Environmental Impact Statement (EIS) for the WFO RMP.

Public involvement is a vital component of the Federal Land Policy and Management Act (FLPMA) and NEPA, vesting the public in the decision making process and allowing for full environmental disclosure. Guidance for implementing public involvement is codified in 40 Code of Federal

Objectives of Scoping

- ◆ Invite agencies and public to participate
- ◆ Identify a preliminary list of environmental and socioeconomic issues to address in the NEPA document
- ◆ Identify and eliminate concerns or issues determined to be insignificant

Regulations (CFR) Section 1506, Part 6 (40 CFR 1506.6), thereby ensuring that federal agencies make a diligent effort to involve the public in preparing NEPA documents.

Public involvement for the WFO RMP is being conducted in four phases:

- Public scoping prior to NEPA analysis to determine the scope of issues and alternatives to be addressed in the RMP/EIS;
- Public outreach via newsletters, news releases, and newspaper advertisements;
- Collaboration with federal, state, and tribal governments; and
- Public review and comment on the Draft RMP/EIS, which analyzes likely environmental effects and identifies the BLM's preferred alternative.

This report documents the results of the first three phases of the public involvement process.

Scoping is a process designed to determine the scope of issues and alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping. Internal scoping is conducted within an agency or cooperating agencies to determine preliminary and anticipated issues and concerns. Internal scoping meetings were held with an interdisciplinary team of BLM resource specialists in 2004 to identify the anticipated planning issues and the methods, procedures, and data to be used in the compilation of the RMP/EIS. These were compiled into an internal RMP Pre-Plan Analysis and Project Management Plan. All of the issues identified in the internal scoping process were relevant to BLM management in the planning area since implementation of the Sonoma-Gerlach and Paradise-Denio Management Framework Plans in 1982.

External scoping is a public process designed to reach beyond the BLM and attempts to clarify the concerns of high importance to the public. The public process is designed to determine and frame the scope of pertinent issues and alternatives to be addressed in a NEPA document. External scoping helps ensure that real problems are identified early and that they are properly studied; that issues of no concern do not consume time and effort; and that the proposed action and alternatives are balanced, thorough, able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (Handbook H-1601-1) requires the preparation of a Scoping Summary Report to capture public input in one document. This report must summarize the discrete comments received during the formal external scoping period. It also must describe 1)

the issues and management concerns from public scoping meetings, internal scoping meetings, and the BLM's Pre-Plan Analysis; and 2) discuss how these comments will be incorporated into the RMP.

1.2 PURPOSE OF AND NEED FOR THE RESOURCE MANAGEMENT PLAN

An RMP is a land use plan that describes broad, multiple-use direction for managing public lands administered by the BLM. FLPMA directs the BLM to develop such land use plans to provide for appropriate uses of public land. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These decisions establish goals and objectives (desired outcomes) for resource management and the measures needed to achieve them. These measures are expressed as actions and allowable uses (i.e., lands that are open or available for certain uses [including any applicable restrictions] and lands that are closed to certain uses).

The BLM developed and approved two land use plans for this area in 1982. At that time, the BLM used a different planning process and called its land use plans "Management Framework Plans." Although the 1982 Sonoma-Gerlach and Paradise-Denio Management Framework Plans for the Winnemucca Field Office were jointly amended in 1999, some of the existing plans do not satisfactorily address new and emerging issues. Laws, regulations, policies, and issues regarding management of these public lands have changed during the life of the existing plans. The BLM is developing a new RMP to ensure compliance with current mandates and to address current issues. If decisions in the 1982 Management Framework Plans are still valid, the BLM may bring them forward into the RMP. When completed, the RMP will replace the existing land use plans.

To support the RMP preparation, the BLM will prepare an EIS that provides a comprehensive evaluation of all environmental issues and impacts. NEPA requires the BLM to consider a range of alternatives in its planning process and to analyze and disclose the potential environmental impacts of proposed RMP decisions. The alternatives and the impact analysis are documented in the EIS. The EIS process also provides opportunities for participation by the public, other federal agencies, state and local governments, and tribal governments in the RMP development. The RMP and EIS will be combined into one document.

1.3 DESCRIPTION OF THE PLANNING AREA

The Winnemucca Field Office is located in the northwest portion of Nevada, encompassing all of Humboldt and Pershing Counties and parts of Washoe, Lyon, and Churchill Counties. The WFO *planning area* boundary encompasses approximately 10,058,312 acres, consisting of public lands, private lands, state lands, Indian reservations, and those federal lands not administered by the BLM. A portion of the planning area managed by the BLM was covered

under a separate RMP completed in July 2004 – the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area RMP. This segment of the planning area will not be covered under this RMP/EIS.

The remaining area, known as the *decision area*, covers about 7,205,564 acres (approximately 72 percent of the overall planning area). Decisions of this planning process may, however, affect or be affected by adjacent lands within and outside the WFO decision area.

1.4 DESCRIPTION OF THE SCOPING PROCESS

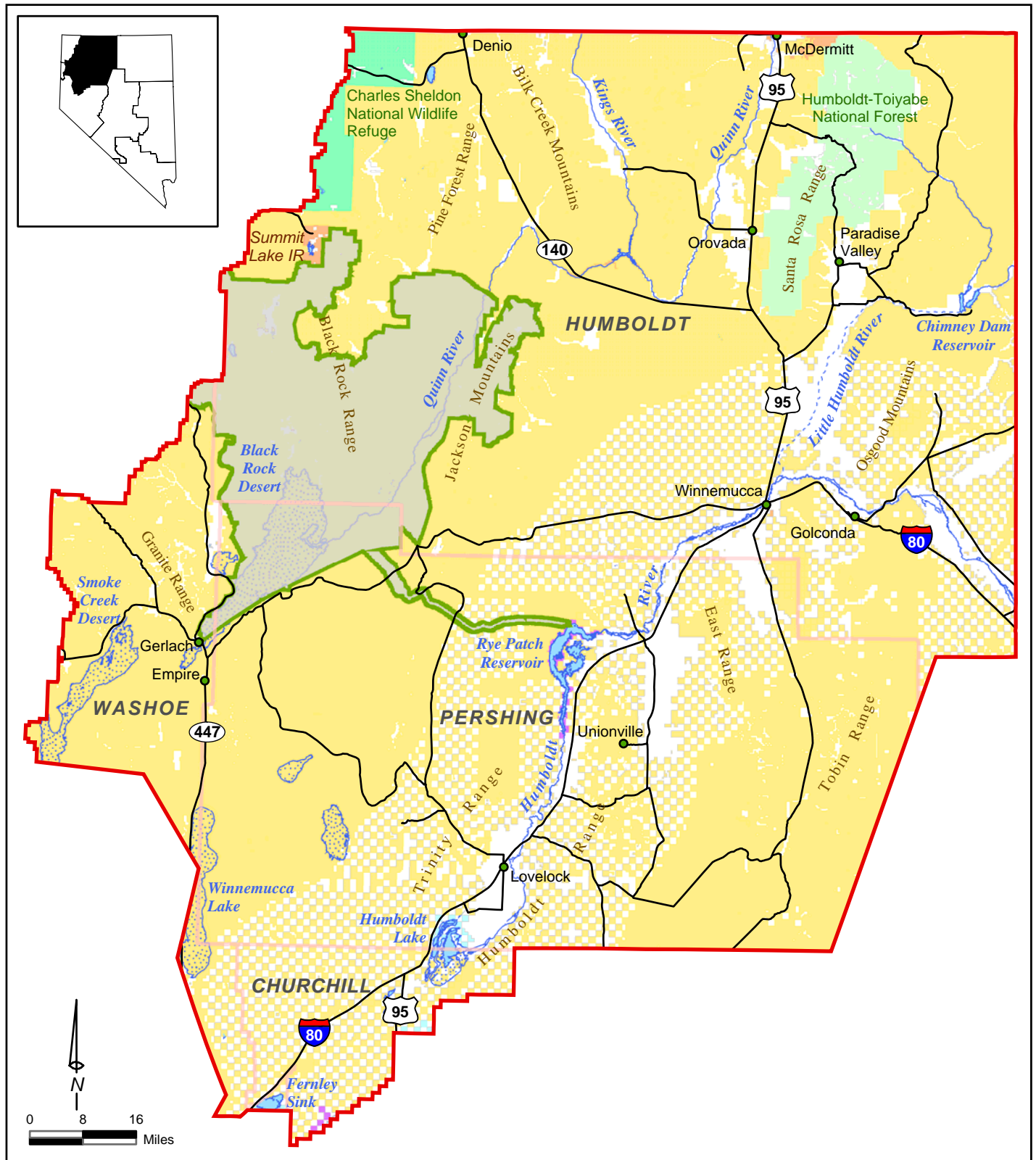
The BLM follows the public involvement requirements according to the CEQ regulations set forth in 40 CFR 1501.7, which states, “there should be an early and open process for determining the scope of issues to be addressed and for identifying the process for determining the scope of issues to be addressed during the planning process.” The BLM also follows public involvement requirements as described in the Resource Management Planning Regulations 43 CFR 1610. The BLM solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, and then distills the comments to identify issues that will be addressed during the planning process. These issues are the scope of analysis for the RMP and are used to develop the project alternatives.

1.4.1 Notice of Intent

The formal public scoping process for the WFO RMP/EIS began on March 25, 2005, with the publication of the Notice of Intent (NOI) in the *Federal Register*. A copy of the NOI is included in Appendix A. The NOI initiated the public scoping process and served to notify the public of the BLM’s intent to develop an RMP for the Winnemucca Field Office. Under CEQ regulations, the public comment period must last for at least 30 days; however, the BLM extended this public comment period until May 24, 2005, providing 60 days. Although the formal comment period has ended, the BLM will continue to consider all comments received during the planning process. The NOI was provided for public consideration at the four scoping open houses and posted on the project web site.

1.4.2 Project Web Site

In March 2005, a Winnemucca RMP/EIS public web site was launched to serve as a clearinghouse for project information during the planning process. The web site, available at www.nv.blm.gov/wformp, provided background information about the project, a public involvement timeline and calendar, maps and photos of the planning area, and copies of public information documents such as the NOI and newsletter. The site also provided a link for submitting comments about the project.



Project Planning Area

Winnemucca Field Office, Nevada

Legend

No warranty is made by the Bureau of Land Management for use of the data for purposes not intended by BLM.



- Winnemucca Field Office
- County Boundaries
- Water
- Dry Lake Bed
- Bureau of Indian Affairs
- Bureau of Land Management
- Bureau of Reclamation
- Private
- Fish and Wildlife Service
- Forest Service
- Nevada State
- Black Rock NCA (excluded)

Figure 1-1

Due to security issues within the online network, the BLM Nevada State Office temporarily discontinued this web site in April 2005. A public web site is not required for NEPA public review periods under CEQ. The BLM, however, understands the inconvenience of the web site not being available during the public review period. For this reason, the public was encouraged to contact the WFO BLM office or attend any of the four scoping open houses held during the first week of May 2005 for any informational requests. Furthermore, the public could submit comments by various other means, including via an email address allocated to receiving scoping comments (comments@wformp.com), by faxing, or by mailing in a pre-paid self-addressed comment form provided in a newsletter distributed in March 2005 and distributed at the scoping open houses.

Upon completion of security upgrades, the site will be reopened to the public, providing up-to-date information on the status of the WFO RMP/EIS and relevant data. A notice will be posted in local papers announcing the availability of the web site.

1.4.3 Newsletter

The first newsletter for the WFO RMP project was mailed on March 23, 2005, to more than 1,600 individuals from the public, agencies, and organizations. The newsletter introduced the BLM and the RMP planning process; provided the preliminary issue themes, planning criteria, and project milestones timeline; and suggested methods for public involvement. The newsletter also provided the dates and venues for the four scoping open houses. A postage-paid comment form was included as an insert to the newsletter to allow the public to easily submit their comments. Additionally, the newsletter gave the public various alternative methods to submit their comments including a dedicated e-mail address (comments@wformp.com), via fax (775-623-1503), and the BLM WFO postal address to mail comments on the enclosed form or in any other format.

In addition to mailing, the newsletter was provided at the scoping open houses and posted on the project web site for public review. Future newsletters will be published at major project milestones and mailed to individuals and organizations that have requested to remain on or be added to the project distribution list. These newsletters also will be posted on the project web site. Participants may request to receive newsletters through electronic mail.

1.4.4 News Release and Newspaper Advertisement

Advertisements were published in the following newspapers to notify the public of the project, to announce the public open houses, to request public comments, and to provide contact information:

- *This & That* – Gerlach, Nevada (April 25, 2005);

- *The Humboldt Sun* – Winnemucca, Nevada (April 26, 2005);
- *Lovelock Review-Miner* – Lovelock, Nevada (April 28, 2005); and
- *Reno Gazette-Journal* – Reno, Nevada (April 28, 2005).

A news release also was issued to various media points during the week of April 25, 2005.

1.4.5 Scoping Open Houses

The BLM hosted four scoping open houses to further provide the public with opportunities to become involved, learn about the project and planning process, meet the RMP team members, and offer comments. As described in Section 1.4.4, the meetings were advertised in local media. Additionally, the newsletter advertising the meetings was mailed to agency staff and members of the public who have participated in past BLM activities and have been included in past BLM distribution lists.

During the first week of May 2005 (see Table 1-1), open houses were held in three locations within the project planning area and one location in Reno, Nevada. Reno is beyond the southern boundary of the WFO planning area, but is convenient to many individuals potentially affected by or otherwise concerned with activities within the WFO planning area.

Table 1-1
Open House Schedule and Attendance

Venue	Location	Date	Time	Attendance
Winnemucca Convention Center, East Hall	Winnemucca, Nevada	May 2, 2005	4:30–7:30 p.m.	11
Pershing County Community Center	Lovelock, Nevada	May 3, 2005	4:30–7:30 p.m.	9
Gerlach Community Center	Gerlach, Nevada	May 4, 2005	4:30–7:30 p.m.	39
BLM Nevada State Office	Reno, Nevada	May 5, 2005	4:30–7:30 p.m.	22
Total				81

At this scoping phase of the planning process, an open house format was chosen over the more formal public meeting format to encourage broader participation, to allow attendees to learn about the project at their own pace, and to enable people to ask questions of BLM representatives in an informal, one-on-one setting. Fact sheets and handouts about the project and a map of the planning area were provided, as was a list of the anticipated planning issues and preliminary planning criteria related to the project. Single-page summaries of each resource issue were provided as a convenient reference to take from the meetings. Site and resource maps were displayed illustrating the current situation and management techniques practiced among different resources and land areas. A slide presentation highlighted key issues and summarized the planning process. Prominent, handicap-accessible local

facilities in informal settings were chosen as venues to encourage broad participation. These venues included two community centers and a convention center. In addition to BLM representatives, a total of 81 people attended the open houses (79 separate individuals; one attendee visited three of the four meetings).

1.4.6 Newspaper Articles

On May 3, 2005, *The Humboldt Sun* (the main local paper for the Winnemucca region) published an article independent of the BLM notification process announcing the BLM's plan to prepare an RMP for the Winnemucca Field Office. Because the article was published the day after the Winnemucca open house, the dates and locations of the three remaining open houses were provided. The article also described the planning process and methods to contact the BLM and/or submit comments on the RMP/EIS. Copies of these articles are included in Appendix B of this document.

1.4.7 Mailing List

The BLM compiled a list of 1,600 individuals, agencies, and organizations that have participated in past BLM projects or requested to be on the mailing list. Each of these individual listings was mailed the initial newsletter (discussed in Section 1.4.3, Newsletter). Recipients of the newsletter and visitors to the scoping open houses were asked to specifically request to stay on the official RMP project mailing list to receive future mailings. Several entries were deleted from the official WFO RMP project mailing list due to duplications, changes of address, and return-to-sender mailings. Several new entries were added. Through this process, the mailing list was revised to approximately 130 entries. Requests to be added to or remain on the official WFO RMP distribution list will continue to be accepted throughout the planning process.

1.5 AGENCY COORDINATION/COOPERATING AGENCIES

A *Cooperating Agency* is any federal, state, or local government agency or Indian tribe that enters into a formal agreement with the lead federal agency to assist in the development of an environmental analysis. On February 16, 2005, the BLM mailed letters to the following local, state, federal, and tribal representatives inviting them to participate as cooperating agencies for the Winnemucca RMP:

- US Fish and Wildlife Service (USFWS)
- Natural Resource Conservation Service
- US Forest Service (USFS)
- Nevada Department of Wildlife (NDOW)
- Burn Paiute Tribe
- Cedarville Rancheria
- Confederated Tribes of Warm Springs Reservation
- Fallon Paiute-Shoshone Tribe
- Fort Bidwell Indian Community
- Fort McDermitt Tribe

- Nevada Department of Agriculture (NDOA)
- Nevada Natural Heritage Program
- State Historic Preservation Office
- Humboldt County
- Washoe County
- Pershing County
- Churchill County
- Lyon County
- City of Winnemucca
- Alturas Indian Rancheria
- Battle Mountain Band
- Klamath Indian Tribe
- Lovelock Paiute Tribe
- Pit River Tribe
- Pyramid Lake Paiute Tribe
- Reno-Sparks Indian Colony
- Shoshone-Bannock Tribes, Fort Hall
- Shoshone-Paiute Tribes of the Duck Valley
- Summit Lake Paiute Tribe
- Susanville Indian Rancheria
- Washoe Tribe
- Winnemucca Tribe
- Inter-Tribal Council of Nevada

Seven agencies accepted the offer to participate in the BLM WFO Planning Process as cooperating agencies:

- Humboldt County;
- City of Winnemucca;
- Washoe County;
- Pershing County;
- Susanville Indian Rancheria;
- Nevada Department of Wildlife; and
- US Fish and Wildlife Service.

These agencies will “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM Land Use Planning Handbook H-1601-1).

The benefits of enhanced collaboration among agencies in the preparation of NEPA analyses include disclosing relevant information early in the analytical process; applying available technical expertise and staff support; avoiding duplication with other federal, state, tribal, and local procedures; and establishing a mechanism for addressing intergovernmental issues.

To initiate the collaborative planning process, on March 25, 2004, BLM mailed letters inviting the aforementioned federal, state, local, and tribal organizations to the four scoping open houses held during the first week of

May. Each of these organizations was also included on the original distribution list to receive the newsletter.

1.5.1 Cooperation and Collaboration with Agencies and Organizations

The BLM believes that face-to-face or one-on-one communication provides the best means of building a trust and good working relationship. The BLM began this practice early in the planning process by giving presentations on the WFO RMP planning effort to the following groups:

- Humboldt County Commissioners on March 7, 2005;
- Pershing County Commissioners on March 16, 2005;
- Sierra Front-Northwestern Great Basin Resource Advisory Council on April 28, 2005;
- City of Winnemucca on May 3, 2005;
- Humboldt County Development Authority on May 10, 2005; and
- two Native American tribal meetings on May 24 and May 26, 2005 (further discussed below in Section 1.6, *Collaboration and Consultation with Tribes*).

The BLM will continue to meet with interested agencies and organizations throughout the planning process, as appropriate, and will coordinate closely with their cooperative partners.

1.5.2 Resource Advisory Council

A Resource Advisory Council (RAC) is a committee established by the Secretary of Interior to provide advice or recommendations to BLM management (BLM Land Use Planning Handbook H-1601-1). A RAC is generally composed of 15 members of the public representing different facets. The Sierra Front-Northwestern Great Basin RAC includes a panel of mixed expertise ranging from natural resources and Native American culture to mining, transportation, and politics. The group is facilitated by the public affairs officer from the BLM.

As provided for by FLPMA, DOI established the RAC program in 1995 as a forum for local citizens to provide advice and recommendations to DOI on management of the public lands. RAC members serve a three year term. In March 2005, five new members were incorporated into the WFO RAC to replace previous members. The first meeting with the new RAC was held on April 28, 2005 at the Winnemucca Field Office. After a presentation of the RMP process highlighting the components and issues of the planning area, preliminary planning criteria, and project status, the RAC elected to form a subgroup to provide assistance and input. The RAC subgroup is expected to meet at a frequency appropriate to meet the needs of the RMP. This subgroup will be an important component of the RMP planning team.

1.6 COLLABORATION AND CONSULTATION WITH TRIBES

The BLM met with two Native American organizations on May 24th (Winnemucca) and May 26th (Reno). On May 24, 2005, Gale Givens, Jeff Johnson, and Mark Ennes of the WFO BLM office, and Ginny Bengston, the cultural resources consultant for the preparation of the RMP, met with tribal representatives from the Fort McDermitt Tribe, Battle Mountain Band, and Lovelock Paiute Tribe at the Holiday Inn Express in Winnemucca, Nevada to discuss tribal concerns to be addressed in the RMP. These tribes wanted to ensure that Native American concerns and land use are addressed in the RMP; they did not believe these issues were adequately incorporated into the 1982 Management Framework Plans (MFPs). They also expressed concern about being given appropriate notification during any archaeological data recovery activities and artifact collections. Tribes would like to receive advanced notice of such activities in case they have site-specific concerns. Site confidentiality was also a concern with these site locations. The group discussed developing standard operating procedures in the RMP to streamline communication and consultations between the BLM and tribal organizations.

On May 26, 2005, Jeff Johnson, Mark Ennes, and Ginny Bengston met with tribal representatives from the Fort McDermott Tribe, Cedarville Rancheria, Susanville Indian Rancheria, and Pyramid Lake Tribe at the BLM Nevada State Office in Reno, Nevada. Key concerns voiced at this meeting included vandalism at rock art sites and past experience in working with other BLM field offices regarding consultation practices and confidentiality of archaeological sites. A representative from the McDermott Tribe was concerned with water run-off from a closed mine in the tribe's area which is thought to be polluting drinking water on the reservation. Representatives requested face-to-face consultation meetings as opposed to consultation letters. Several questions were raised regarding enforcement of cultural site protection and monitoring. Confidentiality of cultural and archaeological sites was a primary concern, and concern was expressed regarding the disappearance of plants that are used in traditional practices.

Like other organizations and governmental agencies, tribes were invited and encouraged to become cooperative agencies. As mentioned in Section 1.5, *Agency Coordination/Cooperating Agencies*, Susanville Indian Rancheria accepted this role in the RMP planning process. The invitation will remain open to tribes as planning continues.

Native American organizations in the WFO planning area include the following:

- Alturas Indian Rancheria
- Battle Mountain Band
- Pit River Tribe
- Pyramid Lake Paiute Tribe

- Burns Paiute Tribe
- Cedarville Rancheria
- Confederate Tribes of the Warm Springs Reservation
- Fallon Paiute-Shoshone Tribe
- Fort Bidwell Indian Community
- Fort McDermitt Tribe
- Klamath Indian Tribe
- Lovelock Paiute Tribe
- Reno-Sparks Indian Colony
- Shoshone-Bannock Tribes
- Shoshone-Paiute Tribes of the Duck Valley Reservation
- Summit Lake Paiute Tribe
- Susanville Indian Rancheria
- Washoe Tribe
- Winnemucca Tribe
- Inter-Tribal Council of Nevada

In a letter dated June 9, 2005, the Fallon Paiute Shoshone Tribe requested continued collaboration with the BLM to address their concerns with land management in the WFO planning area. The BLM is open to continuous discussions with the Fallon Paiute Shoshone Tribe and any other interested tribe or organization.

SECTION 2

COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

Although the end of the official WFO RMP scoping period was May 24, 2005, all written scoping comments received through June 19, 2005 were evaluated and documented in this Scoping Summary Report. Only one comment has been received after this date. Due to the lateness of the comment receipt, the BLM was unable to incorporate it into the Comment Summary analysis; however the comment was evaluated in Section 3 and Appendix D, *Scoping Comments by Planning Issue Theme*, and further will be considered in alternative formulation and project planning. This and any other comments received during the RMP process will be considered during alternative formulation and project planning.

Individuals were encouraged to submit comments in writing unless a special request was made. No such special requests were made. The BLM will continue to accept comments throughout the planning process. The comments received and evaluated in this Scoping Summary Report will be considered in alternative formulation and initial impact evaluations. A total of 58 submissions were received:

- 77.6% by mail [a postage-paid comment form was provided in the newsletter and at the scoping meetings];
- 8.6% by fax;
- 8.6% by hand deliveries to the scoping meetings; and
- 5.2% by e-mail.

A list of commentors and the method and date of receipt is provided in Appendix C. Some individual comment letters included numerous comments. Furthermore, some discrete comments were relevant to numerous resource issues and thereby classified to more than one issue. For

these reasons, the 58 submissions included a total of 452 discrete comments. The postage-paid comment forms provided instructions on requesting confidentiality and on requesting that individual names or addresses be withheld from public review or from disclosure under the Freedom of Information Act.

To ensure that public comments were properly registered and that none were overlooked, a three-phase management and tracking system was used. First, comments were logged and issues and concerns within the submission were categorized into one of the planning issue themes. Since not all comments were about planning issues, the comments were evaluated to identify additional issues to address during the planning process. Second, discrete comments were entered into a database to assist with the analytical review. The database is structured to organize comments by planning issue theme, geographical location of the commentor, and affiliation of the commentor. Finally, these identifiers were queried and tallied to provide quantitative information on issue themes and to pinpoint regions or groups providing the most feedback.

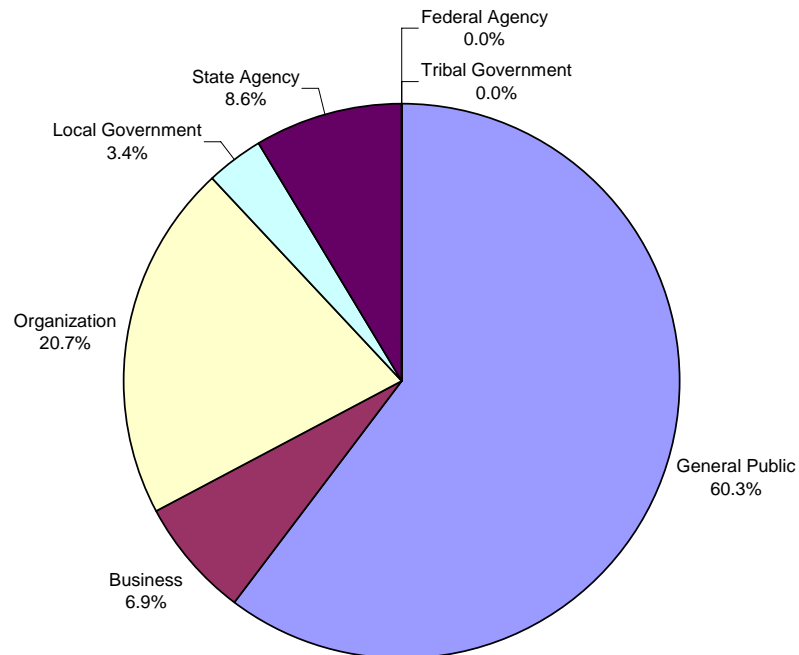
2.2 SUMMARY OF PUBLIC COMMENTS RECEIVED

2.2.1 Comments by Affiliation

Table 2-1 and Figure 2-1 show the number and proportion of discrete comments received by each type of affiliation. Members of the general public who did not disclose a particular affiliation provided 60.3 percent of the comments received during the WFO RMP scoping period. Local interest groups and organizations provided 20.7 percent of the comments received; local and state governmental agencies provided 12.1 percent; and local businesses provided 3.9 percent. No comments were received from elected officials or from federal or tribal governments or organizations. A list of commentors and submissions are included in Appendix C.

Table 2-1
Number of Written Submissions per Affiliation

Affiliation	Number of Written Submissions
Individual	35
Organization	12
Business	4
Federal Agency	0
State Agency	5
Local Agency	2
Tribal Government	0
Elected Officials	0
Total	58

Figure 2-1 Proportion of Written Submissions per Affiliation

2.2.2 Comments by Geographical Area

Table 2-2 and Figures 2-2 and 2-3 show the number and proportion of discrete comments received from each geographical area. About 22 percent of submissions came from addresses outside of Nevada, while only 5.2 percent were from Nevada residents living outside of the planning area. The remaining 71 percent were received from people residing in one of the five counties within the planning area. Washoe County residents provided the greatest portion of both the total submissions (48.3 percent) and the individual comments (48.7 percent). Not considered in these calculations was one comment letter that did not identify a geographical source area.

**Table 2-2
Number of Individual Comments per Geographical Area**

Geographical Source of Comments	Number of Comment Letters	Number of Individual Comments
Humboldt County	9	49
Pershing County	2	2
Washoe County	28	220
Lyon County	1	2
Churchill County	1	1
State of Nevada-Outside of Planning Area	3	40
State of Idaho	7	24
State of California	1	90
Other State	5	22
Unknown	1	2
Total	58	452

Figure 2-2 Proportion of Individual Comment Letters per Geographical Area

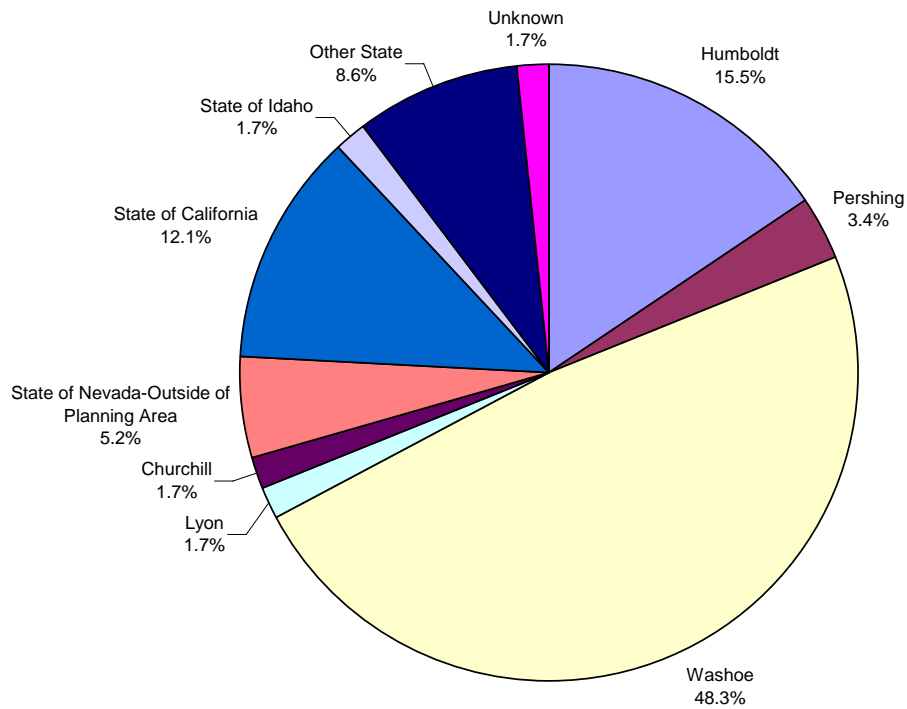
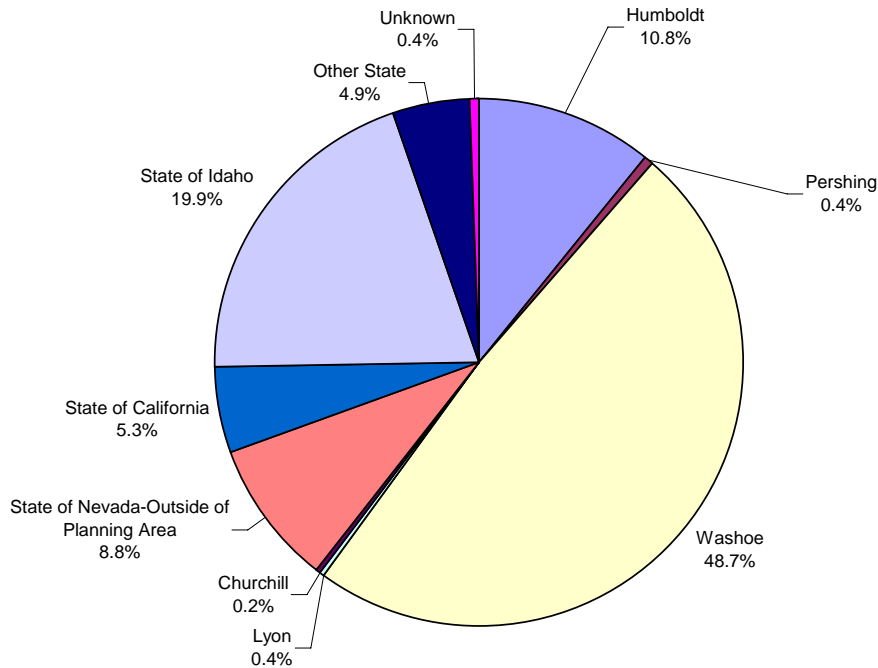


Figure 2-3 Proportion of Individual Comments per Geographical Area

2.2.3 Comments by Planning Issue Theme

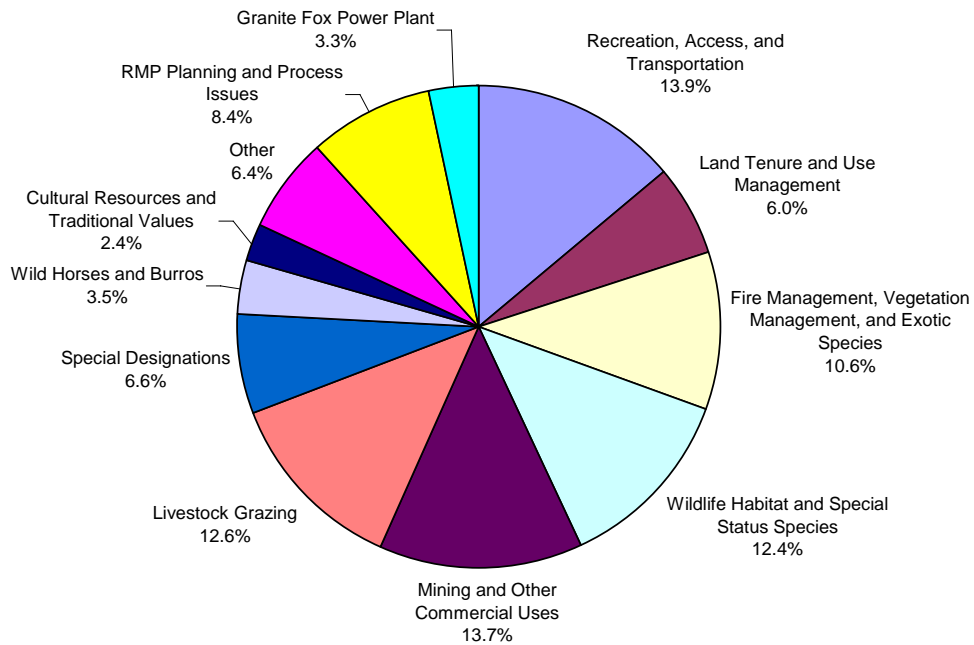
Table 2-3 and Figure 2-4 show the number and proportion of discrete comments on each planning issue theme. Section 3 and Appendix D discuss comments separated by planning issue theme. The majority of comments focused on issues related to Recreation, Access, and Transportation (14 percent); Mining and Other Commercial Uses (14 percent); Livestock Grazing (13 percent); and Wildlife Habitat and Special Status Species (12 percent). Other comments include resource issues that did not receive widespread concern (e.g., Geology not pertaining to mining, air quality, visual resources, etc). Combined, these issues represented 6.4 percent of the overall comments.

Another primary concern among the public within the WFO planning area was a separate project – the Granite Fox Power Plant, which is a proposed coal fire power plant to be constructed near Gerlach, Nevada. Because of the unique attention paid to this project, these comments were compiled and filtered to project-level consideration.

**Table 2-3
Number of Individual Comments per Planning Issue Theme**

Planning Issue Theme	Number of Individual Comments
Recreation, Access, and Transportation	63
Land Tenure and Use Management	27
Fire Management, Vegetation Management, and Exotic Species	48
Wildlife Habitat and Special Status Species	56
Mining and Other Commercial Uses	62
Livestock Grazing	57
Special Designations	30
Wild Horses and Burros	16
Cultural Resources and Traditional Values	11
Other Issues	29
RMP Planning and Process Issues	38
Granite Fox Power Plant Project	15
Total	452

Figure 2-4 Proportion of Individual Comments per Planning Issue Theme



SECTION 3

ISSUE SUMMARY

Issue identification is the first step of the nine-step BLM planning process. As defined in the BLM Land Use Planning Handbook (H-1601-1), planning issues are concerns or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include concerns; needs; and resource use, development, and protection opportunities to consider in RMP preparation. These issues may stem from new information or changed circumstances and from the need to reassess the appropriate mix of allowable uses.

3.1 CHRONOLOGY OF PLANNING ISSUE DEVELOPMENT

The BLM enacted a multi-step issue identification process for the WFO RMP planning effort that began in 2004.

In March 2004, the BLM prepared a Pre-Plan Analysis and Project Management Plan for the WFO RMP/EIS. This plan, used by the interdisciplinary team to commence the planning process, summarized the purpose and need for the RMP. It also highlighted anticipated planning issues, management concerns, and preliminary planning criteria developed by the BLM interdisciplinary team during internal scoping. Based on the lands and resources managed in the planning area, these preliminary issues fell into 21 preliminary themes in the Pre-Plan Analysis which were further distilled and consolidated into 15 issues based on resource likeliness and collaboration:

1. Access and Transportation;
2. Energy;
3. Fire Management;
4. Historic, Cultural, and Paleontological Resources and Traditional Values;

5. Land Tenure;
6. Livestock Grazing;
7. Minerals;
8. Recreation;
9. Social and Economic Concerns;
10. Soil, Water, Air, and Visual Resources;
11. Vegetation and Noxious Weeds;
12. Wild Horses and Burros;
13. Special Designations;
14. Wildlife and Sensitive Species Habitats; and
15. Other RMP Process or Planning Issues.

These preliminary issue themes were expected to encompass most public issues and concerns and to serve as a starting point to spark public consideration; they were not meant to be all-inclusive.

The BLM then issued the NOI to prepare the RMP, which initiated the 60-day scoping period and solicited written comments from the public (further discussed in Section 1.4, *Description of the Scoping Process*). Scoping is a collaborative public involvement process implemented to identify and refine planning issues to address in the planning process. During the scoping period, the BLM also met with interested groups, tribes, and agencies, as discussed in Sections 1.5, *Agency Coordination/Cooperating Agencies*, and 1.6, *Collaboration and Consultation with Tribes*. The BLM hosted four open houses and solicited written comments from the public during the scoping period. The scoping period provided the BLM additional information on the public's concerns and suggestions regarding the planning area.

Information included in the Pre-Plan Analysis; gathered from meetings with interested individuals, organizations, agencies, and tribal representatives; and heard and accepted during the public scoping process were compiled and evaluated to supplement and refine the preliminary issue themes and to develop discreet planning issue statements, which are discussed below in Section 3.2. The purpose of these planning issue statements is to highlight the key issues distilled from these initial planning and scoping processes. These statements are further listed in Section 3.3 according to the various issue themes and associated comments received from the public and interested organizations.

3.2 PLANNING ISSUE THEMES AND ISSUE STATEMENTS

The planning issues will be used to develop alternative management strategies that will be analyzed during the planning process. As discussed in

Section 2.1, *Method of Comment Collection and Analysis*, comments were reviewed, categorized, and evaluated. Key issues identified during comment evaluation were further distilled from the 15 issues identified during pre-scoping planning down to the following nine issue themes:

1. Recreation, Access, and Transportation
2. Land Tenure and Use Management
3. Fire Management, Vegetation Management, and Exotic Species
4. Wildlife Habitat and Special Status Species
5. Mining and Other Commercial Uses
6. Livestock Grazing
7. Special Designations
8. Wild Horses and Burros
9. Cultural Resources and Traditional Values

Most public comments received during the scoping process fell under these topical issues and are summarized through these categories in Section 3.3. Furthermore, comments are listed in Appendix D.

The following planning issue statements, along with subsequently identified issues, planning criteria, and other information (e.g., occurrence and development potential for minerals), will be used by the BLM and co-operators to help formulate a reasonable range of alternatives for the RMP.

1. How will transportation and recreation be managed to improve public access, protect natural and cultural resources, reduce user conflicts, and provide motorized and non-motorized recreation opportunities?
2. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
3. What actions or restrictions will be needed to maintain or improve natural resource values, reduce dangerous fuel loads, control and prevent noxious weeds and other undesirable plant species, and reduce risk of crossing ecological thresholds?
4. How will uses and land management activities be managed to maintain and improve terrestrial and aquatic habitats in a scattered land ownership pattern while maintaining multiple-use land management?

5. How will the BLM manage mining and other commercial uses (other than livestock grazing) on public lands while protecting natural and cultural resources? How will management of BLM lands affect the social and economic resiliency and sustainability of local economies?
6. How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and/or using natural and cultural resources?
7. Where are special designations appropriate to protect unique resources?
8. What is the appropriate management level and other management measures to protect natural and cultural resources while protecting the health and safety of these wild horse and burro communities? Where should Herd Management Area boundaries be adjusted?
9. How can the BLM use proactive management, tribal cooperation, and land tenure tools to identify, protect, and conserve cultural resources? How can these values be incorporated into other management activities?

3.3 PUBLIC COMMENTS BY PLANNING THEME

This section provides summaries of the public comments received during the public scoping process. The actual comments are listed in Appendix D. Each discrete comment received during public scoping was entered into a database and assigned a planning classification. The classifications indicate which public concerns will be addressed and resolved through this planning effort and which ones will not. Comments under Category A are those that will be addressed/considered in the RMP. Comments under Category B will be resolved through policy or administrative actions. Comments under Category C can be addressed by the BLM outside of this planning effort and/or are concerns that the BLM is already actively addressing. Comments under Category D are beyond the scope of this planning effort.

It is important to note that while many concerns are included in the nine planning themes, not all concerns and comments are included in the planning issues. These other concerns and comments – which include comments in Category A (as explained in Appendix D) that are not explicitly included in issue statements and management concerns identified during personal meetings with BLM staff or from the Pre-Plan Analysis – will still be addressed by the RMP and considered in the effects analysis, but these concerns will not have overriding influence on the development of alternatives. Furthermore, adjustments or additions may be made to the planning issues as the planning process proceeds and BLM continues to

review information, meet with the interdisciplinary team, and talk with the public.

Tables D-1 through D-9 present the anticipated decisions for each resource issue. This section is sorted by the nine planning issues refined at the end of the scoping period as discussed in Section 3.2. The number of discrete comments exceeded the number of written submissions received because many written submissions included multiple discrete comments. Furthermore, many discrete comments pertain to more than one planning issue theme and are therefore considered under all applicable themes. As such, some comments are included in more than one table.

3.3.1 Recreation, Access, and Transportation

Appendix D, Table D-1 provides the comments relevant to Recreation, Access, and Transportation. The main theme among comments received pertaining to public access was maintaining access to as many areas as possible. Several respondents, however, appreciated the degradation that can occur to the environment from human influence and especially motorized vehicles. The public is concerned with the effects of development and land use designations on their access rights and recreational opportunities.

Recreation is considered by many to be the best use of BLM public lands. Many, however, feel that these activities, especially motorized uses and subsequent effects from recreational uses such as population and socioeconomic results, must be managed more stringently in order to protect natural and cultural resources in the planning area. One commentor recommended establishing a Special Recreation Management Area program to balance both social and environmental needs on BLM lands. In general, the public requested a thorough assessment and documentation of all types of recreation and their effects on the environment, economy, and well-being of local residents. Based on the results of the RMP/EIS analysis, the public would like clearly defined documentation (i.e., signs or brochures) designating which areas are open, closed, or restricted and an explanation of how this decision was determined. This is the first step in enforcement of land use designations.

Pre-Plan Analysis Goals for Recreation, Access, and Transportation

Recreation

- Identify areas as open or closed to special recreation as a management tool to keep pace with the growing demand for such permits.
- Identify access needs to recreation areas.
- Designate areas for the management of motorized vehicles (including off-highway vehicles).

- Determine how to allow public visitation and still protect sensitive resources (e.g., cultural sites, sensitive status species).
- Assess popular recreation areas or potential areas for future development.
- Identify trails for all terrain vehicles (ATVs), dirt bikes, mountain bicycles, foot and horseback traffic. Develop a long distance ATV trail.
- Develop public information and environmental awareness brochures and programs for public land visitors. (Include initiatives such as Heritage Tourism, Leave No Trace, and Treat Lightly®.)
- Identify allowable kinds and levels of recreation to sustain goals, standards, and objectives that balance public recreation demand with natural resource protection.

Transportation

- Manage safe ground transportation facilities, roads, and trails.
- Identify and manage aviation facilities.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Recreation, Access, and Transportation and will be used to develop RMP alternatives:

1. How will transportation and recreation be managed to improve public access, protect natural and cultural resources, reduce user conflicts, and provide motorized and non-motorized recreation opportunities?
2. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
5. How will the BLM manage mining and other commercial uses (other than livestock grazing) on public lands while protecting natural and cultural resources? How will management of BLM lands affect the social and economic resiliency and sustainability of local economies?

3.3.2 Land Tenure and Use Management

Appendix D, Table D-2 provides comments relevant to Land Use Management. The focal point of these comments was land disposal. Views were split over this issue with some respondents supporting land disposal, and others opposing it. Some respondents felt that disposals should only be for renewable energy projects and not fossil fuels projects, while others commented that lands surrounding communities should be made available for disposal, noting that some communities may depend on these lands to accommodate future growth. Many comments expressed concern with the

scatter land tracts currently spread across the planning area, and most support a multiple-use approach to public lands management. How land disposals may affect public access is also a concern. Respondents want the BLM to evaluate the criteria it uses to decide which lands will be disposed of; to consider national, state, and county approaches to land management; and to provide clear explanations of any decisions that are made.

Pre-Plan Analysis Goals for Land Tenure and Use Management

Land Tenure Adjustment

- Determine lands and interests appropriate for disposal or retention (sale, exchange, Recreation and Public Purposes, lease or sale, Carey Act, desert land entries, etc.).
- Identify lands and other interests (e.g., easements, mineral estates) appropriate for acquisition.
- Implement and review withdrawals and segregation limiting the use of public lands.
- Propose alternatives for resolution of the *checkerboard* land pattern created by railroad land grants. Prioritize and sell or trade checkerboard lands to block up ownership and improve management.
- Determine Cadastral survey needs and concerns.
- Identify and manage split estate lands.
- Incorporate urban interface needs/adjustments through management.

Land Use Authorizations (See IM 2002-196)

- Identify land use authorizations under 43 CFR 2920, including transportation and utility needs, designation of communication sites, and airport leases.
- Determine rights-of-way (ROW) avoidance and exclusion areas.
- Identify easement acquisition needs.
- Identify areas for solar and other renewable energy.
- Modify existing land use authorization stipulations to better provide public health and safety, protection of plant and animal species, and prevention of weed infestations.
- Identify areas with potential for wind energy development and areas to be closed to wind energy facilities.
- Identify utilities to support renewable energy.
- Determine needs for ROW corridors and use areas related to production and distribution of energy.
- Describe limitations or other uses in the potential corridors.
- Identify existing and potential corridors.

- Identify existing and potential ROW development areas to support energy development (wind energy sites) and communications sites.
- Describe adverse effects on distribution or production of energy supplies.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Land Tenure and Use Management and will be used to develop RMP alternatives:

1. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
2. How will uses and activities be managed to maintain and/or improve terrestrial and aquatic habitats in a scattered land ownership pattern while maintaining multiple-use land management?
9. How can the BLM use proactive management, tribal cooperation, and land tenure tools to identify, protect, and conserve cultural resources? How can these values be incorporated into other management activities?

3.3.3 Fire Management, Vegetation Management, and Exotic Species

Appendix D, Table D-3 provides the comments relevant to Fire Management, Vegetation Management and Exotic Species. Comments received focused on methods and procedures to improve current rangeland conditions. Respondents noted that the BLM needs to place emphasis on fire and rehabilitation management, commenting that techniques such as prescribed burns and full suppression should be used to manage exotic species like cheat grass and knapweed. Several comments also noted that livestock grazing should be used as a fire management tool.

Protecting native species was another topic of concern. The public is concerned with protecting riparian habitat and all native vegetation communities. Respondents requested that the BLM address the exotic species problem and facilitate restoration efforts in areas where native species are present. Some areas require protection that may preclude certain activities (e.g., grazing) to prevent future disturbances. Respondents noted that weed infestations can result from domestic livestock, mineral and energy exploration, and roads and vehicles. One commentor also noted that only native species should be used in post-fire seeding efforts.

Pre-Plan Analysis Goals for Fire Management, Vegetation Management, and Exotic Species

Fire management

- Follow Interim Guidance IM OF&A 2003-38.
- Implement a Fire Planning and Management Unit.
- Identify fire management categories per H-1601 Appendix D, such as areas where wildland fire is not desired, areas where unplanned fire is likely to cause negative effects, areas where fire is desired to manage ecosystems, areas where fire is desired to ???.
- Implement fire suppression.
- Determine constraints on fire activities to protect sensitive resources.
- Determine fire management unit strategies for suppression and preparedness.
- Implement fuels management.
- Identify type and level of fire activity and fuel treatment to achieve resource objectives, including targets for fire size, estimated level (acreage) of fuel treatment, and rehabilitation guidance.
- Implement wildland-urban interface management.
- Follow prescribed fire use and procedures.
- Fire restoration planning and implementations
- Maintain State of Nevada Smoke Management requirements.
- Implement community protections and community assistance.

Vegetation

- Determine future desired vegetation, structural stages, and riparian/wetland functions necessary to have healthy plant communities on public lands. Provide for native plant, fish and wildlife habitats.
- Develop methods to restore and maintain healthy ecological conditions as identified in Rangeland Health Standards and Guidelines.
- Incorporate appropriate non-native naturalized plants with, or in place of, native plants during restoration activities and thereafter.
- Minimize habitat fragmentation through management.
- Maximize biodiversity of native species through management.
- Use management tools and practices to maintain healthy woodlands (e.g., pines, cottonwood, pinion, juniper, aspen, etc.) and riparian areas.
- Provide for the public demand for woodland products (pine nuts, fuel wood, Christmas trees, posts, poles, etc.) through management.
- Implement vegetation monitoring and test plots.
- Restore sagebrush ecosystems through management.
- Maximize sensitive plant species recovery through management.

- Prioritize classes or criteria to provide for the maintenance, restoration, or improvement of vegetation communities.
- Control pests such as Mormon crickets and grasshoppers.
- Manage forest products.

Invasive Non-Native Species

- Implement actions (including use restrictions) to control weed infestations and prevent new infestations.
- Ensure ongoing surveying for invasive species through management.
- Prioritize classes or criteria for weed control strategies.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Fire Management, Vegetation Management, and Exotic Species and will be used to develop RMP alternatives:

3. What actions or restrictions will be needed to maintain or improve natural resource values, reduce dangerous fuel loads, control and prevent noxious weeds and other undesirable plant species, and reduce risk of crossing ecological thresholds?

3.3.4 Wildlife Habitat and Special Status Species

Appendix D, Table D-4 provides the comments relevant to Wildlife Habitat and Special Status Species. The main theme discussed related to protection and conservation. Comments focused on protection for several specific species, including Long-Billed Curlew, Pygmy rabbit, Townsend's big-eared bat, California myotis, Preble's shrew, Brazilian fee-tailed bat, Swainson's hawk, Peregrine falcon, and the Sage Grouse.

Respondents also focused attention on the BLM's need to protect water sources, in addition to all elements of essential habitats for wildlife species found in the planning area. Respondents requested that the BLM consider conservation measures to enhance and restore current conditions. Although several comments described a need for increasing protective measures for species, respondents also stated that public lands are managed for multi-use purposes and should not be closed to certain activities because a sensitive resource exists.

Pre-Plan Analysis Goals for Wildlife Habitat and Special Status Species

Threatened, Endangered and Special Status Animal and Plant Species

- Define special status species policy.

- Identify and manage against threats to special status species and designated critical habitat. Identify strategies and decisions to conserve and recover threatened, endangered, and special status species.
- Limit or prevent habitat fragmentation through management.
- Manage Lahontan Cutthroat Trout and desert dace habitat.
- Identify and eliminate habitat degradation for special status species.
- Manage sage grouse using BLM Sage Grouse Strategy and Governor's Recovery Planning.
- Consult with USFWS about existing Memorandums of Agreement.
- Manage habitat to avoid need to list individual species.

Water, Watersheds, Wetlands, and Riparian Areas

- Manage watersheds that need special protection to preserve aquatic ecosystems, ensure public health and safety, or facilitate other public uses.
- Improve water quality and quantity through management and comply with objectives of the Clean Water Act.
- Implement management practices to maintain or restore conditions in riparian and wetland habitats.
- Manage streams and riparian areas to maintain or enhance resource and habitat values in systems containing native fish, special status species, or introduced fish.
- Identify and manage Public Water Reserves.

Wildlife Habitat

- Locate suitable areas for the introduction or reintroduction and management of species such as Lahontan Cutthroat Trout, Bighorn sheep, elk, ruffed grouse, and exotic and naturalized flora and fauna species.
- Determine possible risks to wildlife species and their habitats and develop actions to minimize risks.
- Manage habitat to ensure implementation of the Migratory Bird Treaty Act.
- Use geographic approach to planning for biological diversity (GAP Analysis).
- Allocate forage for any and all existing and potential wildlife and manage habitat for buffers, droughts, non-game, and aquatic fauna to prevent habitat fragmentation.
- Manage mine adits, shafts, and declines for bats (bat gate if necessary).
- Manage dead and dying snags for wildlife habitat.

- Manage for native species but acknowledge the potential for experimenting with non-native flora (forage kochia) and fauna species to increase production, recreation and biodiversity.
- Improve wildlife habitat through management, including vegetation treatments, and provide or improve water sources, including placement of guzzlers.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Wildlife Habitat and Special Status Species and will be used to develop RMP alternatives:

1. How will transportation and recreation be managed to improve public access, protect natural and cultural resources, reduce user conflicts, and provide motorized and non-motorized recreation opportunities?
2. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
4. How will uses and land management activities be managed to maintain and/or improve terrestrial and aquatic habitats in a scattered land ownership pattern while maintaining multiple-use land management?
5. How will the BLM manage mining and other commercial uses (other than livestock grazing) on public lands while protecting natural and cultural resources? How will management of BLM lands affect the social and economic resiliency and sustainability of local economies?
6. How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and/or using natural and cultural resources?
8. What is the appropriate management level and other management measures to protect natural and cultural resources while protecting the health and safety of these wild horse and burro communities? Where should Herd Management Area boundaries be adjusted?

3.3.5 Mining and Other Commercial Uses

Appendix D, Table D-5 provides the comments relevant to Mining and Other Commercial Uses. Comments received concentrated on minerals and the development of renewable resources. The majority of respondents supported commercial uses on public lands. Nevada is a state well suited for renewable energy and several supported the development of renewable energy sources such as wind, solar, and geothermal. Comments stressed that

the BLM's focus should be on these resources. Respondents also discussed how the economic well-being of the local communities is dependent on the use of these resources, noting that farming and ranching needs to be considered in the plan as well. With a concern of access, one respondent highlighted the unique resources and recreational opportunities found with mining and commercial uses in the planning area asking that these areas remain open and not be sold or closed to public use.

Some respondents voiced concern about impacts these commercial uses have on water, biological, and cultural resources. Respondents felt that mines should be held responsible for cleanup and restoration. Others requested that the BLM identify potential sites for gas lines, power lines, water lines, rail lines, and roads as necessary to support the development of the mining industry, and to consider the local communities when making these decisions. Recreation activities and impacts on the local community from big events, such as Burning Man, also need to be evaluated for their effect on the community. One commentor was opposed to fee stations for day use or campgrounds.

Pre-Plan Analysis Goals for Mining and Other Commercial Uses

Minerals

- Manage for mine site rehabilitation, reclamation, and closure.
- Determine areas that should be closed or withdrawn from mineral entry.
- Determine areas that should be open for mineral development.
- Determine preferred areas for mineral material sales.
- Post mine uses and disposal.

Geothermal

- Determine areas open for geothermal leasing.
- Determine areas closed for geothermal leasing.
- Develop standard operating procedures and lease stipulations to protect resources.
- Develop reasonable, foreseeable development scenarios.
- Update information and data on existing geothermal leases.

Oil and Gas (see W.O. IM 2001-191 and IM 2003-233)

- Determine areas open and closed to oil and gas leasing.
- Develop standard operation procedures and lease stipulations to protect resources.
- Develop reasonable, foreseeable development scenarios.
- Review and, if applicable, integrate study results per the Energy Policy and Conservation Act and determine oil and gas potential with the WFO.

- Prioritize oil and gas areas to be reviewed for appropriate levels of or stipulations or unnecessary impediments to oil and gas production.
- Identify off-site mitigation opportunities or other management options.
- Identify areas of high oil and gas potential verses those of low potential.
- Determine management and planning regarding placement of oil and gas infrastructure.
- Update information and data on existing oil and gas leases.
- Manage renewable energy (see land use authorization section).
- Propose reclamation of abandoned mined lands, including management for occupied and potential bat habitat.

Social and Economic Conditions (See IM 2001-038 and WO IM 2002-167)

1. Identify, describe, and analyze social and economic trends and social and economic conditions, including: income, employment, production by industrial sector, population and demographics, population trends, and political, social, and community organizations and infrastructure.
2. Cooperate with local, regional, state and tribal governments, and all relevant organizations and constituencies that have an interest in the disposition of public lands.
3. Evaluate economic impacts (beneficial and adverse) of management proposals.
4. Determine degree of dependence on BLM resources as it relates to social and economic conditions.
5. Update and evaluate demographic information.
6. Incorporate social information, values, beliefs, attitudes, lifestyles, community resiliency, and land use patterns in management proposals.
7. Evaluate economic development, public/private partnerships, community diversification.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Mining and Other Commercial Uses and will be used to develop RMP alternatives:

2. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
5. How will the BLM manage mining and other commercial uses (other than livestock grazing) on public lands while protecting natural and cultural resources? How will management of BLM

lands affect the social and economic resiliency and sustainability of local economies?

6. How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and/or using natural and cultural resources?

3.3.6 Livestock Grazing

Appendix D, Table D-6 provides the comments relevant to Livestock Grazing Management. While livestock grazing is largely inclusive of commercial uses, as discussed above, grazing and ranching is an important and unique land use in the WFO planning area and, consequently, a source of many concerns. These concerns are not solely associated with the commercial and/or socioeconomic issues of grazing. For this reason the BLM has isolated these concerns for a separate evaluation.

Comments associated with livestock grazing were fairly divided. Much of the public recognized that ranching is a traditional and public land use and discussed the several benefits that accompany grazing, such as developed water sources for wildlife and a reduction in fire fuel. One respondent noted that ranching “contributes economically and socially” to the community. Others, however, voiced concern about degradation caused by livestock grazing. Respondents were concerned about livestock trampling vegetation and eroding soils, which leads to weed invasions, degradation of habitat for wildlife, and destruction of sensitive areas such as cultural sites and riparian areas.

Pre-Plan Analysis Goals for Livestock Grazing

Livestock Grazing

- Determine management of areas that are not or should not be available for livestock grazing.
- Incorporate Rangeland Health Standards and Guidelines.
- Accommodate livestock permit holders while allotments are closed.
- Manage livestock, wild horses, and wildlife to maintain or restore upland habitats; maintain or restore healthy woodland habitats; and maintain or restore riparian areas, meadows, wetlands and/or aquatic systems in cooperation with NDOW and USFWS.
- Establish forage banks through management in order to provide forage for livestock during drought, restoration, rehabilitation, etc.
- Assess the need for, manage, define, and process new allotments.
- Manage allotments that cross field office boundaries.
- Adjust livestock numbers, season of use, and use and type of livestock.
- Use livestock as a fuels reduction tool.

- Take action during periods of range depletion due to drought, fire, insect infestation, etc. For example, how would rangeland grazing practices address potential drought conditions?

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Livestock Grazing and will be used to develop RMP alternatives:

6. How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and/or using natural and cultural resources?

3.3.7 Special Designation Areas

Appendix D, Table D-7 provides the comments relevant to Special Designation Areas. Comments were split between those individuals who do not believe additional designations are needed and those who think more designations are necessary to provide added protection to specific areas and resources. Respondents in opposition of special designations felt it takes too much land away from the public for activities such as hunting, mining, and recreation activities. One comment noted that “special designations should be proposed only where there is a demonstrated need that all interests can agree on.”

Respondents mentioned that the following areas need additional protection: Granite Range due to the abundance of wildlife species; Porter Springs due to the presence of several migrant bird species; the Historic California Trail (including the visual integrity); the Lava Beds Complex due to washes, springs, and a variety of wildlife, bird and vegetation species; areas surrounding water resources; and the North Fork and Little Humboldt River for inclusion into the National Wild and Scenic River system. The public also felt it was important for the BLM to recognize that in-holdings or edge-holdings generally acquired through land exchanges should be managed identically to the surrounding or adjacent wilderness study areas (WSAs).

Pre-Plan Analysis Goals for Special Designation Areas

Special Designations

- Identify potential Areas of Critical Environmental Concern (ACECs).
- Identify potential wild and scenic rivers.
- Identify sites suitable for Watchable Wildlife, Rails to Trails, Back Country Byways, and Properties of Cultural and Religious Importance (PCRI) designations.
- Update information and management of wilderness study areas.
- Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Special Designation Areas and will be used to develop RMP alternatives:

7. Where are special designations appropriate to protect unique resources?

3.3.8 Wild Horses and Burros

Appendix D, Table D-8 provides the comments relevant to Wild Horses and Burros Management. Comments centered on how to determine the appropriate management level (AML) for the Herd Management Areas (HMAs). Most respondents were in favor of adjusting the AML for current conditions, stressing that inventories and assessments are necessary to determine appropriate levels. One commentator pointed out that the AML should be set at a level to “maintain the integrity of the soil, water, and vegetation for wild animals and livestock.” The public also mentioned the importance of holding facility conditions and available budgets and workforce to handle new animals as they are gathered. Some of the public felt that wild horses and burros should be left alone. One respondent discussed the problems associated with gathering animals faster than the BLM can care for them (placing animals at risk of disease and reducing adoption opportunities).

Pre-Plan Analysis Goals for Wild Horses and Burros

Wild Horses and Burros

- Adjust/correct boundaries to HMAs.
- Determine/express AML as a range to reflect animal recruitment between gather cycles or other fluctuations in the population.
- Implement management actions to reduce wild horse and burro populations below the upper range of AML or restrictions to support thriving natural ecological balance and multiple use.
- Make management decisions to deal with HMAs or Herd Areas (HAs) that lack viable populations or no longer have animals living within existing HMA or HA boundaries.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Wild Horses and Burros and will be used to develop RMP alternatives:

8. What is the appropriate management level and other management measures to protect natural and cultural resources while protecting the health and safety of these wild horse and burro communities? Where should Herd Management Area boundaries be adjusted?

3.3.9 Cultural Resources and Traditional Values

Appendix D, Table D-9 provides the comments relevant to Cultural Resources and Traditional Values. Most comments pertained to the need for additional protective measures. The public generally felt that cultural resources need to continually be inventoried, studied, and protected. They also want the BLM to work with the tribes directly to ensure proper management of the resources. Places of concern include springs and seeps, the Historic California Trail, the *lava beds*, Bluewing Mountains and playa, and Porter Springs. Livestock facilities and impacts from livestock grazing should also be evaluated for their effects on cultural resources. Respondents requested that the BLM consider cultural resources when identifying lands for disposal.

Pre-Plan Analysis Goals for Cultural Resources and Traditional Values

Cultural Resources and Traditional Cultural Values (See IB 2002-101)

- Develop sufficient information to identify the nature and importance of all cultural resources known or expected to be present in the planning area.
- Develop management actions and prescriptions that will protect cultural resources.
- Preserve and protect significant cultural resources known to exist
 - a. Develop a model based on the known density and distribution of cultural resources in relation to observable environmental variables.
 - b. Develop historic context to facilitate eligibility evaluations.
- Identify and evaluate new cultural resources that may be significant (proactive inventory and evaluation [National Historic Preservation Act (NHPA), Section 110] and compliance, and project-driven work [NHPA, Section 106]).
- Implement appropriate measures to avoid or mitigate adverse effects to significant cultural resources in accordance with each Cultural Resource Use allocation as required, as defined in Washington Office IB No. 2002-101 (e.g., scientific use, public use, etc.).
- Through good-faith consultation, ensure that tribal issues and concerns relative to the management of cultural values are given appropriate consideration during the planning process.
- Compile a comprehensive inventory of PRCI and develop appropriate measures for their protection in consultation with regional tribal groups.
- Promote the public stewardship of cultural resources by enhancing interpretative programs, establishing local and regional partnerships, and using volunteers.

- Identify opportunities to use cultural properties for scientific, educational, recreational, and traditional purposes.

Paleontological Resources

- Preserve and protect important paleontological resources known to exist and identify area-wide criteria or site-specific use restrictions.
- Identify additional areas where geological units (i.e., formations, members, etc.) contain or are likely to contain paleontological resources.
- Evaluate the potential of areas to contain paleontological resources and classify them according to BLM manual 8270 and Manual Handbook H-8270-1.
- Develop management recommendations (including mitigation measures in specific localities) to promote scientific, educational, and recreational uses of paleontological resources.
- Develop and implement strategies to regularly monitor areas where important paleontological materials have been identified.

Related Planning Issues

As discussed in Section 3.2, the following planning issues are related to Cultural Resources and Traditional Values and will be used to develop RMP alternatives:

1. How will transportation and recreation be managed to improve public access, protect natural and cultural resources, reduce user conflicts, and provide motorized and non-motorized recreation opportunities?
2. What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency, appropriate and agreeable levels of public access, and increased public and natural resource benefits?
5. How will the BLM manage mining and other commercial uses (other than livestock grazing) on public lands while protecting natural and cultural resources? How will management of BLM lands affect the social and economic resiliency and sustainability of local economies?
6. How will the BLM manage livestock grazing on public lands while protecting, managing, restoring, and/or using natural and cultural resources?
7. Where are special designations appropriate to protect unique resources?
8. What is the appropriate management level and other management measures to protect natural and cultural resources while protecting the health and safety of these wild horse and burro

communities? Where should Herd Management Area boundaries be adjusted?

9. How can the BLM use proactive management, tribal cooperation, and land tenure tools to identify, protect, and conserve cultural resources? How can these values be incorporated into other management activities?

3.4 PUBLIC COMMENTS NOT APPLICABLE TO PLANNING THEMES

Some public comments did not apply to any of the nine planning themes but are still being considered in the planning process and development. These comments are generally related to agency consultation, administrative action issues, or the overall RMP process. (Future steps in the RMP process are summarized in Section 6.)

Although not a designated planning theme, as discussed in Sections 1.5 and 1.6, consultation with other agencies and local tribes is imperative to a successful management plan. Several agencies are preparing or have already prepared similar land management plans or have implemented resource-level plans (e.g., fire management plans, weeds programs). Consultation can save time, money, and effort for all parties involved and can generate more effective approaches to broad-scale issues.

Public Comment Summary

Appendix D, Table D-10 provides the comments concerning the RMP Planning Process. Respondents concentrated on collaboration, urging BLM to work cooperatively with an array of groups and individuals including members of Indian tribes, NDOW, livestock permittees, and local residents and business owners. A challenge they recognize is the checkerboard configuration with public lands and private ownership, which makes collaboration crucial. The public also encouraged the BLM to use criteria and standards for as many decisions as possible, making it easier to apply management on site-specific activities during implementation-level management phases. One respondent discussed the challenge the BLM faces as a multi-use agency, commenting that [the BLM] must “strike a balance among many competing uses to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.”

3.5 COMMENTS CONCERNING THE GRANITE FOX POWER PLANT

One prominent result of the WFO RMP/EIS scoping process was a clear concern regarding the proposed Granite Fox Power Plant project, which includes an application from the power plant company to the BLM for ROW on BLM land and a 1,200-acre lease. Opponents to this project attended each of the four open houses and numerous comments were received contesting the power plant. Table D-11 of Appendix D lists comments received concerning the Granite Fox Power Plant.

Although the purpose of an RMP is to provide a **broad overview** of multiple-use land management, thereby stepping back from specific projects, the concern about this project was exceptional. In order to meet the goal of developing a dynamic RMP that will be used to govern BLM lands for the next 15 to 20 years, the RMP cannot address specific projects. However, comments received regarding the coal-powered power plant can be considered in a more general sense in establishing guidelines for the types of land uses that may be permitted on public lands or requirements of future lease holders prior to submitting an application or starting a lease. While these comments could not stand as a primary issue in developing alternatives for the EIS, some comments will be considered and incorporated, as appropriate, in the planning process. Furthermore, many of these concerns will be addressed in the cumulative effects section of the EIS.

Furthermore, a separate EIS for the Granite Fox Power Plant project is being prepared. The EIS included a scoping period hosted by the BLM from April 22, 2005 through June 22, 2005, which included public meetings during the week of May 23, 2005. During this scoping period, the BLM accepted comments specific to the project for consideration in developing this EIS.

3.6 ISSUES RAISED THAT WILL NOT BE ADDRESSED

To date, comments and concerns raised during the scoping period have been summarized in this scoping report. Based on those comments, the preliminary planning issues have been refined and classified as Category A of Tables D-1 through D-11. Comments and concerns classified as Categories B, C, and D in Tables D-1 through D-11 will not be considered by the BLM during this RMP planning process. These concerns will be resolved through policy or administrative actions (Category B); addressed by the BLM outside of this planning effort or are concerns that the BLM is already actively addressing (Category C); or are beyond the scope of this RMP effort (Category D). Most of the comments that were classified under Category D were considered out of scope because they either addressed project-specific issues (i.e., the Granite Fox Power Plant project; see Section 3.7.2, *Future Implementation Decisions*) or were beyond the WFO planning area (i.e., within the Black Rock Desert High Rock Canyon planning area, which is covered under a separate RMP completed in July 2004).

3.7 ANTICIPATED DECISIONS

FLPMA requires the BLM to manage public lands using principles of multiple use and sustained yield. Management direction resulting from the planning process for the RMP needs to be adaptable to changing conditions and demands over the life of the RMP. RMPs provide management direction and help with decision making regarding appropriate multiple uses and allocation of resources; develop strategies to manage and protect resources; and establish systems to monitor and evaluate the status of resources and effectiveness of these management practices. As part of an analysis of the management

situation, the BLM is reviewing the existing condition of the environment and existing management situation to identify which existing management decisions should be continued, which existing management directions should be modified, and which management directions should be developed and added.

This scoping report does not make any decisions, nor does it change current management direction set forth in the 1982 Sonoma-Gerlach and Paradise-Denio Management Framework Plans. It only summarizes those issues distilled from comments identified during the scoping period for the WFO RMP planning area. Issues summarized in this scoping report (Section 3.2), along with subsequently identified issues, planning criteria, and other information (e.g., occurrence and development potential for minerals), will be used by the BLM and cooperators to help formulate a reasonable range of alternatives during the next phase of the RMP process. Each identified alternative (including continuation of existing management) will represent a complete and reasonable plan for managing the Winnemucca Field Office. Future decisions will occur at two levels: the RMP, or land use planning, level, and the implementation level. These decision types are described below. In general, only RMP-level decisions will be made as part of the RMP process. The BLM's evaluation of identified alternatives will be documented in an EIS prepared as part of the RMP process (as required by NEPA).

3.7.1 Future RMP-Level Decisions

Future RMP-level decisions will be made on a broad scale. These decisions will identify management direction and guide future actions for the next 10 to 20 years within the planning area. The RMP will provide a comprehensive yet flexible framework for managing the numerous demands on resources managed by the BLM.

The vision for the Winnemucca Field Office planning area will be described in the RMP in terms of desired outcomes, which represent one of two categories of RMP-level decisions. (The second category of RMP-level decisions involves allowable uses and actions to achieve goals.) Desired outcomes will be expressed in terms of specific goals, standards, and objectives. Goals are broad statements of desired outcomes (e.g., ensure sustainable development). Standards are descriptions of conditions or the degree of function required (e.g., land health standards). Objectives are specific, quantifiable, and measurable desired conditions for resources (e.g., manage sagebrush communities to achieve a certain canopy cover by the year 2015).

The second category of RMP-level decisions, allowable uses and actions to achieve desired outcomes, will be expressed in the RMP as allowable uses, actions needed, and land tenure decisions. Livestock grazing, administrative designations (e.g., ACECs), and land disposal are examples of some RMP-level decisions in this category.

3.7.2 Future Implementation Decisions

The RMP makes broad-scale decisions that guide future land management actions and subsequent site-specific implementation decisions. Implementation decisions are often referred to as project-level or activity-level decisions and represent the BLM's final approval of on-the-ground actions. Implementation decisions require a more-detailed site-specific environmental analysis that will tie back to the EIS prepared for the RMP. Implementation decisions generally constitute final approval of on-the-ground actions to proceed. (Land Use Planning Handbook H-1601-1 IV(B)). An example of an implementation decision is development and management of a recreation site. In some circumstances, site-specific implementation decisions may be made through the RMP process.

3.8 SPECIAL DESIGNATIONS, INCLUDING NOMINATIONS

The special designations section of the RMP will include a discussion of designated areas such as ACECs, National Historic Trails, Wild and Scenic Rivers, and WSAs. It also will consider new special management area designations, including Special Recreation Management Areas, ACECs, and river segments eligible and suitable for inclusion in the National Wild and Scenic Rivers System. As summarized in Section 3.3.7 and Table D-7, only a few comments requested studies or designations to wilderness. Per the Utah Wilderness Settlement, the BLM no longer inventories or studies areas for wilderness suitability (including WSA status), so current WSAs will not be expanded from the RMP process. One comment on Table D-7 discounts this rule by stating that "this agreement is invalid and will ultimately be overturned in pending litigation." While the BLM appreciates this point, the agency is required at this time to follow the Utah Wilderness Settlement policy.

SECTION 4

PLANNING CRITERIA

Scoping introduces of planning criteria to the public for comment. At a minimum, the BLM must offer a 30-day comment period on planning criteria. Planning criteria guide development of the plan by helping to define the decision boundaries and focuses; they are generally based upon applicable laws, director and state director guidance, and results of public and governmental participation (43 CFR 1610.4-2). The criteria establish constraints, guidelines, and standards for the planning process. Prior to the public scoping period, the BLM identified the following preliminary planning criteria to use to evaluate planning issues and develop project alternatives. These preliminary planning criteria were included in the initial newsletter, which was distributed to over 1,600 recipients, displayed at the four public open houses held during the first week of May 2005, and posted on the project web site while online for public comment during the 60-day scoping period. Following are the criteria.

- The RMP will comply with the FLPMA and all other applicable laws, regulations, and policies. Decisions in the plan will be consistent with the existing plans and policies of adjacent local, state, tribal, and federal agencies to the extent allowed by federal law, regulations, and policy.
- Impacts of the RMP will be analyzed in an EIS developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500 and the Departmental Manual 516 DM 1-8. The scope of analysis will be consistent with the level of analysis in approved plans and in accordance with BLM standards and program guidance.
- The RMP will recognize the state's responsibility to manage wildlife and water.
- The RMP will recognize valid existing rights.

- Lands covered in the RMP will be public surface and split estate lands managed by BLM. No decisions will be made in the RMP relating to the management of lands not administered by the BLM.
- The RMP will be developed cooperatively and collaboratively with the State of Nevada, tribal governments, county and municipal governments, other federal agencies, the Sierra Front-Northwestern Great Basin RAC, and other interested groups, agencies and individuals.
- RMP development will include government-to-government consultation with Native American Indian Tribes in conformance with the requirements of Section 202(c)(9) of the FLPMA; Section 101(d)(6) of the National Historic Preservation Act; the American Indian Religions Freedom Act; Treaty Rights where applicable; Executive Order 13007 (Indian Sacred Sites); Executive Order 12898 (Environmental Justice); BLM Handbook H-8160-1; BLM Nevada Instruction Memorandum NV-2005-008; and other applicable laws, regulations, and policies.
- The RMP will incorporate standards and guidelines developed in accordance with regulations in 43 CFR Subpart 4180 and approved by the Secretary of the Interior, and will incorporate valid and relevant management decisions from previous BLM plans.
- Minerals management will be consistent with FLPMA and with the Mining and Minerals Policy Act of 1970; the National Materials and Minerals Policy; the Research and Development Act of 1980; and the 3600 and 3800 regulations.
- Determinations for mineral development will be based on mineral, geothermal, and oil and gas potential within the planning area. Reasonable foreseeable development scenarios for fluid minerals will be developed in accordance with BLM Handbook H-1624-1.
- Soil/vegetation correlations, maps, and the included information from Natural Resource Conservation Service Soil Surveys and range site descriptions will be used to evaluate ecological conditions and the fundamentals of rangeland health in uplands.
- Existing ecological site inventories will be used to establish current vegetation conditions.
- Fire Management objectives will be consistent with the current WFO Fire Management Plan; the 2001 Federal Wildland Fire Policy; the National Fire Plan; the Healthy Forest Restoration Act; and other policies.

- Fire Management objectives will be consistent with the current WFO Fire Management Plan; the 2001 Federal Wildland Fire Policy; the National Fire Plan; the Healthy Forest Restoration Act; and other policies.
- The RMP/EIS will be consistent with Homeland Security policies.
- All proposed management actions will be based on current scientific information, research, and technology, and on inventory and monitoring information.
- The RMP will recognize lifestyles and concerns of area residents and stakeholders. Analysis of economic matters will comply with established acceptable standards and environmental justice factors will be considered using analytical parameters recommended by the EPA Environmental Justice Guidelines (April 1998).
- Lands identified for disposal prior to July 25, 2000, will be further identified for disposal under the Federal Land Transaction Facilitation Act.
- Lands identified for acquisition will be consistent with FLPMA Section 205, existing policy and regulation and, when applicable, with the Southern Nevada Public Lands Management Act.
- Adopt adaptive management principles as appropriate.

Although no specific criterion differing from those above were suggested by the public during scoping, many comments supported the method provided by these principles to evaluate the issues. The public encouraged the BLM to use criteria and standards for as many decisions as possible, making it easier to manage site-specific activities during implementation-level management phases. Therefore, the above planning criteria will be used to guide the RMP process. Furthermore, the BLM is currently consulting with and will continue to consult with relevant agencies and tribal governments on issues that will support an effective planning process and offer consistency with similar processes within and adjacent to the WFO RMP planning area.

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SECTION 5

DATA SUMMARY/DATA GAPS

Existing resource information available in the Winnemucca Field Office, including GIS theme maps, will be used in formulating resource objectives and management alternatives. As part of the RMP planning, evaluation, and data collection process, the BLM has inventoried available information and identified data needs. Information is being compiled and put into digital format for use in the planning process and development of resource maps for the RMP/EIS. Information already in a digital format must be updated to the same standards required for newly entered data. Because this information is imperative to quantify resources, create updated maps and manipulate information during alternative formulation, this process must be completed before actual analysis can begin. Any new data generated during the RMP will be used to address planning issues and will meet applicable established standards. This information can be made available upon request.

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SECTION 6

FUTURE STEPS

6.1 SUMMARY OF FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BLM's planning process is to develop management alternatives based on the issues presented in Section 3.2. These alternatives will address planning issues identified during scoping and will meet goals and objectives to be developed by the interdisciplinary team. In compliance with NEPA, CEQ regulations, and the BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation. The BLM will also continue to meet with collaborating agencies, interested tribes, and community groups and individuals. A detailed analysis of the alternatives will be documented. Based on the analyses of the alternatives, the BLM's Preferred Alternative will then be selected and analyzed in detail. The Preferred Alternative is often made up of a combination of management option components from the various alternatives to provide the best mix and balance of multiple land and resource uses to resolve the issues.

The analysis of the alternatives will be documented in a Draft RMP/EIS. Although the BLM welcomes public input at any time during the planning process, the next official public comment period will begin when the Draft RMP/EIS is published, which is anticipated for the Spring and Summer of 2007. The draft document will be widely distributed to elected officials, regulatory agencies, and members of the public, and will be available on the project web site (www.nv.blm.gov/wformp). The availability of the draft document will be announced via a Notice of Availability in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will be held in Winnemucca, Lovelock, Gerlach, and Reno, Nevada during the 90-day period.

At the conclusion of the public comment period, the Draft RMP/EIS will be revised. A Proposed RMP/Final EIS will then be published. The availability of the proposed document will be announced in the *Federal Register*, and a public protest period will follow. If necessary, a notice will be published in

the *Federal Register* requesting comments on significant changes made as a result of protest. Concurrently the Governor of Nevada will review document for consistency with approved state or local plans, policies, or programs.

At the conclusion of the public protest period and Governor's consistency review, the BLM will resolve all protests and any inconsistencies, and the approved RMP and Record of Decision will be published. The availability of these documents will be announced in the *Federal Register*.

Figure 6-1 outlines the major milestones of the WFO RMP/EIS planning process and when the public will be asked for its input.

All publications, including this report, newsletters, the Draft RMP/EIS, and the Notice of Availability, will be published on the official WFO RMP web site (www.nv.blm.gov/wformp) once security upgrades are complete. In addition, pertinent dates regarding solicitation of public comments will be published on the web site.

6.2 CONTACT INFORMATION

The public is invited and encouraged to participate throughout the planning process for the RMP. Some ways to participate include:

- Reviewing the progress of the RMP at the official WFO RMP/EIS web site at www.nv.blm.gov/wformp once it is back online. The web site will be updated with information, documents, and announcements throughout the duration of the RMP preparation; and
- Requesting to be added to or to remain on the official WFO RMP project mailing list in order to receive future mailings and information.

Anyone wishing to be added to or deleted from the distribution list or requesting further information may e-mail their request to information@wformp.com or contact Jeff Johnson at (775) 623-1500. Please provide your name, mailing address, and e-mail address, as well as your preferred method to receive information.

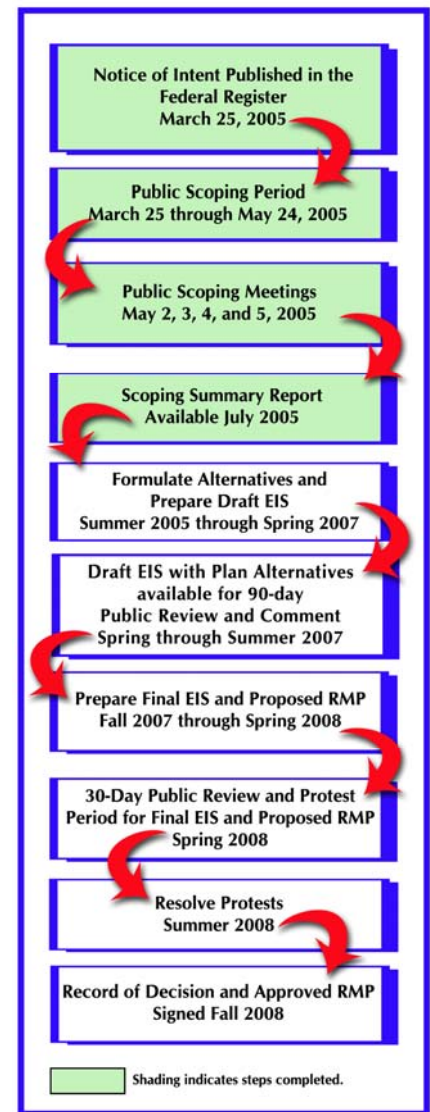


Figure 6-1
Public Involvement
Timeline

Appendix A Notice of Intent

The attached pages from the *Federal Register* include the NOI for the WFO RMP/EIS. The NOI was published on March 25, 2005, and officially initiated the scoping process for the project.

Act established both the Sloan Canyon NCA of 48,438 acres and the North McCullough Wilderness Area (14,763 acres entirely contained within the NCA), which are located southeast of the City of Las Vegas, adjacent to the City of Henderson in Clark County, Nevada. The Clark County Act requires the BLM to develop a plan for the appropriate use and management of the Sloan Canyon NCA and Wilderness within three years of enactment. The Draft RMP/EIS fulfills the needs and obligations set forth by NEPA, FLPMA, the Clark County Act, and BLM management policies described in the Las Vegas RMP of 1998. Upon completion, this RMP/EIS will amend the Las Vegas RMP regarding management of the 48,438 acres within Sloan Canyon NCA and North McCullough Wilderness Area. The management alternatives considered in the Draft RMP/EIS include: Continuing current management practices (no action alternative), an alternative that emphasizes natural character, one that allows moderate developed use while maintaining natural character, and another that emphasizes developed uses. The no action alternative is required by NEPA, and would continue current management as described in the Las Vegas RMP, in conjunction with the requirements of the Clark County Act. The alternatives contain both land use planning decisions and implementing decisions to provide planning structure to facilitate management of the Sloan Canyon NCA. The analysis of the alternatives includes an evaluation of indirect, direct, and cumulative impacts.

Major resources and activities addressed in the Draft RMP/EIS include: Recreation, the North McCullough Wilderness Area, cultural resources, special designations, visual resources, interpretation, facilities, lands and realty, transportation, vegetation management, wildlife management, wildland fire management, water resources and quality, air quality, livestock grazing, geology and soils, minerals, abandoned mines, hazardous materials, and socioeconomics and environmental justice.

Dated: January 10, 2005.

Helen Hankins,

Field Manager, Las Vegas.

[FR Doc. 05-5880 Filed 3-24-05; 8:45 am]

BILLING CODE 5865-DP-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[NV-020-1610-DO-015F]

Notice of Intent To Prepare a Resource Management Plan (RMP) and Associated Environmental Impact Statement (EIS) and Initiate the Public Scoping Process

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: Notice is hereby given that the Bureau of Land Management (BLM), Winnemucca Field Office (WFO), Nevada, is initiating a planning effort to prepare the Winnemucca RMP and associated EIS. The RMP would replace the existing 1982 Sonoma-Gerlach and Paradise-Denio Management Framework Plans and one land use plan amendment titled the "Paradise-Denio and Sonoma-Gerlach Management Framework Plan-Lands Amendment (Jan. 1999)."

DATES: The scoping comment period will commence with the publication of this notice and will end on May 24, 2005. However, collaboration with the public will continue throughout the planning process. Public meetings will be announced through the local news media, newsletters, and a BLM Web site at least 15 days prior to the event. Comments on issues and planning criteria should be received on or before the end of the scoping period at the address listed below.

ADDRESSES: Written comments should be sent to the Winnemucca Field Office, Bureau of Land Management, 5100 E. Winnemucca Blvd., Winnemucca, NV 89445 or via fax at (775) 623-1503.

Comments, including names and addresses of respondents, will be available for public review at the BLM WFO, during regular hours 7:30 a.m.-4:30 p.m., Monday-Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comment. Such requests will be honored to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

FOR FURTHER INFORMATION CONTACT: For further information and/or to have your name added to our mailing list, contact

Jeff Johnson, Project Lead, Telephone (775) 623-1500.

SUPPLEMENTARY INFORMATION: The purpose of the public scoping process is to identify issues that should be considered in the RMP/EIS and to initiate public participation in the planning process. BLM personnel will also be present at scoping meetings to explain the planning process and other requirements for preparing the RMP/EIS.

The planning area includes lands within the BLM WFO administrative boundary. The WFO RMP decision area encompasses about 7.1 million acres of public lands, which are located within Humboldt, Pershing, Lyon, Churchill and Washoe Counties, Nevada. The decision area includes public lands administered by the BLM WFO, and does not include private lands, state lands, tribal trust lands, federal lands not administered by the BLM, and lands located within the planning area of the RMP for the Black Rock Desert—High Rock Canyon Emigrant Trails National Conservation Area, associated Wilderness Areas, and other contiguous lands.

The plan will fulfill the needs and obligations set forth by the National Environmental Policy Act (NEPA) and associated Council of Environmental Quality Regulations 40 CFR part 1500. The plan also fulfills requirements of the Federal Land Policy and Management Act (FLPMA: 43 U.S.C. 1711), applicable planning regulations at 43 CFR part 1600, and BLM management policies.

The BLM WFO will work collaboratively with interested parties to identify the management actions and decisions that are best suited to local, regional, and national needs and concerns of the public, subject to planning criteria to be developed to guide the plan. Preliminary issues and management concerns have been identified by the BLM, other agencies, and meetings with individuals and user groups. The major issue themes to be addressed in the RMP effort include:

- Management and protection of public land resources while allowing for multiple uses.
- Management of riparian areas and water quality concerns.
- Recreation/visitor use and safety management.
- Travel management, including Off Highway Vehicle.
- Management of areas with special values.
- Energy and minerals management.
- Management of wildlife habitat including protection of sensitive species habitat.

- Land Tenure Adjustments.

After gathering public comments, issues will be placed in one of three categories.

1. Issues to be resolved by the plan;
2. Issues resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

Rationale will be provided in the plan for each issue placed in category two or three. In addition to these major issues, a number of management questions and concerns will be addressed in the plan. The public is encouraged to help identify these questions and concerns during the scoping phase. An interdisciplinary approach will be used to develop the plan in order to consider the variety of issues and concerns identified. Disciplines involved in the planning process will include specialists with expertise in rangeland management, minerals and geology, outdoor recreation, archaeology, paleontology, wildlife, fisheries, wild horse & burro, weeds, lands and realty, hydrology, soils, engineering, fire, wilderness, hazardous materials, and social and economic. The BLM has identified some preliminary planning criteria to guide the development of the plan. The following planning criteria have been proposed to guide the development of the plan, to avoid unnecessary data collection and analyses, and to ensure the plan is tailored to issues. Other criteria may be identified during the public scoping process. Proposed planning criteria include the following:

- The plan will comply with all applicable laws, regulations and current policies.
- Broad-based public participation will be an integral part of the planning and EIS process.
- The plan will recognize valid existing rights.
- Areas with special designations as appropriate.

Dated: December 16, 2004.

Vicki L. Wood,

Acting Field Manager.

[FR Doc. 05-2632 Filed 3-24-05; 8:45 am]

BILLING CODE 4310-HC-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[OR-090-5882-PH-EE01; HAG-05-0088]

Meeting Notice

AGENCY: Bureau of Land Management.

ACTION: Meeting notice for the Eugene District, Bureau of Land Management (BLM) Resource Advisory Committees

under Section 205 of the Secure Rural Schools and Community Self Determination Act of 2000 (P.L. 106-393).

SUMMARY: This notice is published in accordance with Section 10(a)(2) of the Federal Advisory Committee Act. Meeting notice is hereby given for the Eugene District BLM Resource Advisory Committee pursuant to Section 205 of the Secure Rural Schools and Community Self Determination Act of 2000, Pub. L. 106-393 (the Act). Topics to be discussed by the BLM Resource Advisory Committee include selection of a chairperson, public forum and proposed projects for funding in "Round 5, FY 06" under Title II of the Act.

DATES: The BLM Resource Advisory Committees will meet on the following dates: The Eugene Resource Advisory Committee will meet at the BLM Eugene District Office, 2890 Chad Drive, Eugene, Oregon 97440, 9 a.m. to 4:30 p.m., on June 16, 2005 and 9 a.m. to 4:30 p.m., on July 21, 2005. The public forum will be held from 12:30-1 p.m. on both days.

SUPPLEMENTARY INFORMATION: Pursuant to the Act, five Resource Advisory Committees have been formed for western Oregon BLM districts that contain Oregon & California (O&C) Grant Lands and Coos Bay Wagon Road lands. The Act establishes a six-year payment schedule to local counties in lieu of funds derived from the harvest of timber on federal lands, which have dropped dramatically over the past 10 years.

The Act creates a new mechanism for local community collaboration with federal land management activities in the selection of projects to be conducted on federal lands or that will benefit resources on federal lands using funds under Title II of the Act. The BLM Resource Advisory Committees consist of 15 local citizens (plus 6 alternates) representing a wide array of interests.

FOR FURTHER INFORMATION CONTACT: Additional information concerning the BLM Resource Advisory Committees may be obtained from Wayne Elliott, Designated Federal Official, Eugene District Office, P.O. Box 10226, Eugene, Oregon 97440, (541) 683-6600, or wayne_elliott@or.blm.gov.

Dated: March 17, 2005.

Mark Buckbee,

Acting Eugene District Manager.

[FR Doc. 05-5912 Filed 3-24-05; 8:45 am]

BILLING CODE 4310-33-M

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[WY-957-05-1320-BJ]

Notice of Filing of Plats of Survey

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of filing of plats of survey, Wyoming.

SUMMARY: The Bureau of Land Management (BLM) has filed the plats of survey of the lands described below in the BLM Wyoming State Office, Cheyenne, Wyoming, on March 15, 2005.

FOR FURTHER INFORMATION CONTACT: Bureau of Land Management, 5353 Yellowstone Road, P.O. Box 1828, Cheyenne, Wyoming 82003.

SUPPLEMENTARY INFORMATION: These surveys were executed at the request of the Bureau of Land Management, and are necessary for the management of resources. The lands surveyed are:

The plat and field notes representing the corrective dependent resurvey of a portion of the subdivisional lines, Township 17 North, Range 94 West, Sixth Principal Meridian, Wyoming, was accepted March 15, 2005.

The plat and field notes representing the dependent resurvey of a portion of the Thirteenth Standard Parallel North, through Range 76 West, a portion of the Ninth Auxiliary Meridian West, through Township 52 North, between Ranges 76 and 77 West, a portion of the south boundary, and the subdivisional lines, Township 52 North, Range 76 West, Sixth Principal Meridian, Wyoming, was accepted March 15, 2005.

Copies of the preceding described plats and field notes are available to the public at a cost of \$1.10 per page.

Dated: March 15, 2005.

John P. Lee,

Chief Cadastral Surveyor, Division of Support Services.

[FR Doc. 05-5910 Filed 3-24-05; 8:45 am]

BILLING CODE 4310-22-P

Appendix B
Newspaper Article

BLM developing new plan for local field office

Special to the Sun

WINNEMUCCA — The Bureau of Land Management Winnemucca Field Office is beginning a collaborative planning process to develop a new Resource Management Plan and associated Environmental Impact Statement for public lands it manages in northwest Nevada.

The RMP would guide management actions on the public lands covered by the plan for approximately the next 15 to 20 years.

"We will involve the public at every step of the planning process," said Jeff Johnson, planning lead for the project. The first such opportunity will be at a series of scoping meetings to be held May 2 through May 5. All meetings will be open houses held from 4:30 p.m. to 7:30 p.m. as follows:

- Lovelock: Today, Pershing County Community Ctr, 820 6th St;
- Gerlach: Wednesday, Gerlach Community Center, 410 Cottonwood St;
- Reno: Thursday, BLM Nevada State Office, 1340 Financial Blvd.

"We hope to have good participation by the public at these meetings because the more active the public is in a planning process, the more comprehensive and responsive to public needs the plan turns out to be," said Johnson.

"We will provide many opportunities for public involvement including attendance at public meetings, membership on subgroups of the Resource Advi-

sory Council, and submission of written comments directly to BLM."

Johnson said that a Notice of Intent to develop the plan was published in the Federal Register on March 25, 2005. This resource management plan will replace two outdated management framework plans originally developed in the 1980s. It will cover lands managed by BLM in Pershing and Humboldt Counties and parts of Washoe, Lyon and Churchill counties.

The new Resource Management Plan is necessary because the existing MFPs do not satisfactorily address new and emerging resource issues such as increasing recreation use, declining habitat conditions for sage-grouse, off-highway vehicle use, mining reclamation and closure, and changed human economic and social needs and expectations. In addition, there have been many changes in laws and regulations.

Comments may be submitted at the meetings or in writing through Wednesday, May 25, 2005 to: Winnemucca RMP, c/o Jeff Johnson, 5100 E Winnemucca Blvd., Winnemucca Nev., 89445-2921. Alternative means of submitting comments include: Faxing to (775) 623-1503 (Attention: Winnemucca RMP); e-mailing to: comments@wformp.com; or completing the comment form online at www.nv.blm.gov/wformp

Additional information about the planning process is available by contacting Johnson at the Winnemucca BLM office at (775) 623-1500.

8 - The Humboldt Sun, May 3 - 5, 2005

COMMUNITY NEWS

nd an equal opportunity lender. Its company, Great Basin Financial

BLM

Appendix C
List of Commentors

RMP Scoping Comments	
Commenter	Date of Submission
Comments Received by Mail	
Michael Anderson	March 26, 2005
John Jay	March 27, 2005
Jeff Vasey	March 30, 2005
Deanna Armstrong	March 29, 2005
Denver Dickerson	March 29, 2005
Mark Tynan	March 31, 2005
Robert McKinnon	March 27, 2005
Ronald Parratt	March 28, 2005
Gerald Kirk	April 3, 2005
Bob Pruitt	April 5, 2005
Roy Leach	April 1, 2005
Robert Colby	N/A
Ralph Young	March 28, 2005
Dick Ingraham	March 31, 2005
Ron Hess	April 3, 2005
Bethany Thompson	April 5, 2005
American Gas Association	April 5, 2005
Western Watersheds Project	April 14, 2005
Brian Dale Covey	April 9, 2005
Larie Trippet	April 28, 2005
Sherman Swanson	April 28, 2005
Andrew Wing	April 25, 2005
Edward & Barbara Conley	May 6, 2005
Don Buck	May 10, 2005
Rod Aeschlimann	April 1, 2005
Don Asher	May 16, 2005
Francis Phillips	May 12, 2005
Nevada Depart. of Wildlife	May 17, 2005
Mike S. Moore	May 14, 2005
Sunny DeForest	May 5, 2005
R.D.D., Inc. - Richard Drake	May 24, 2005
The Toiyabe Chapter of the Sierra Club - Tina Nappe	May 31, 2005
Washoe County Dept of Community Development-Adrian P. Freund	May 31, 2005
Karen Boeger/Dan Heinz	May 31, 2005
Rebel Creek Ranch	May 10, 2005
Friends of Nevada Wilderness - Nevada Wilderness Project	May 24, 2005
John Hunter	May 15, 2005
Michael B. Stewart	May 24, 2005
Paradise Valley Weed Control District	May 20, 2005
Newmont Mining Corp. - John Mudge	May 20, 2005
Tebeau Piquet	May 25, 2005
Central Committee - Nev. State Grazing Boards - James Linebaugh	May 24, 2005
Friends of Nevada Wilderness	May 24, 2005

RMP Scoping Comments	
Commenter	Date of Submission
Michael & Nancy Kerson	May 27, 2005
Humboldt River Ranch Association	May 18, 2005
Leah Brasbear	April 2, 2005 (received July 1, 2005)
Comments Received by Email	
Terry Reed	May 14, 2005
Central Committee - Nev. State Grazing Boards - James Linebaugh	May 24, 2005
Karen Boeger	June 19, 2005
Comments Received by Fax	
American Gas Association	April 4, 2005
Henry G. Nesmith	May 10, 2005
Kenneth Hladek	May 24, 2005
Nevada Clean Energy Coalition	May 24, 2005
Brad Quilici, Rye Patch Ranch	June 8, 2005
Comments Received at the Scoping Meetings	
Jim Christison	May 2, 2005
Rise McKnight	May 3, 2005
Carol Kaufmann	May 4, 2005
Loella Sweet	May 5, 2005
Thomas Cosman	May 5, 2005

Appendix D

Scoping Comments by Planning Issue Theme

Tables D-1 through D-11 list the scoping comments received from the public and interested parties during the public scoping period, March 25 through May 24, 2005. These comment tables are separated by nine planning issue themes:

- D-1. Recreation, Access, and Transportation
- D-2. Land Tenure and Use Management
- D-3. Fire Management, Vegetation Management, and Exotic Species
- D-4. Wildlife Habitat and Special Status Species
- D-5. Mining and Other Commercial Uses
- D-6. Livestock Grazing
- D-7. Special Designations
- D-8. Wild Horses and Burros
- D-9. Cultural Resources and Traditional Values

Comments concerning RMP Planning and Process Issues are listed on Table D-10, and comments specifically addressing the Granite Fox Power Plant are included on Table D-11.

PUBLIC COMMENTS BY PLANNING THEME

All individual comments received during public scoping were entered into a database and assigned a planning classification. These classifications indicate which public concerns will be addressed and resolved through this planning effort and which ones will not. Comments under Category A will be addressed/considered in the RMP. Comments under Category B will be resolved through policy or administrative actions. Comments under Category C can be addressed by the BLM outside of this planning effort or are concerns that the BLM is already actively addressing. Comments under Category D are beyond the scope of this planning effort. Tables D-1 through D-9 present the anticipated decisions for each resource issue. This section is sorted by the nine planning issues refined at the end of the scoping period as provided in Section 3.2.

The number of individual comments exceeded the number of written submissions received because many written submissions included multiple individual comments. Furthermore, many of these individual comments pertain to more than one planning theme and are therefore considered under all applicable themes. As such, some comments are included in more than one table (Tables D-1 through D-10).

**Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation**

Comment	Planning Classification ¹			
	A	B	C	D
As a historian who uses an off-road vehicle for historical research as well as for recreation, I do not want to see the Lassen-Applegate Trail closed to appropriate vehicular travel through the Black Rock Desert and High Rock Canyon areas. As you probably know, part of the trail through High Rock Canyon were later used as a stage route into Nevada and Idaho.				✓
Continue to allow vehicular access to all areas. Additional wilderness designation makes this beautiful area inaccessible for public enjoyment.	✓			
We just would like to see existing trails and roads to remain open except for areas where multiple roads are unnecessary. The Black Rock National Conservation Area (BRNCA) seemed able to keep most areas accessible except for the wilderness areas. Also would like to keep the remote feeling of the area.	✓			
Please keep our BLM lands open to everyone including motorized users.	✓			
I've driven through the High Rock Desert along the Lassen Applegate trail and I'd like that kept open for future generations.				✓
As Nevada continues to steadily develop and growth rates increase our recreational sites are slowly disappearing. I love the Nevada desert and want access to explore and enjoy its beauty.	✓			
By the map on your March 2005 newsletter, it appears that the Lassen Trail is included in the Black Rock Conservation Area - if so, is Antelope Springs accessible by vehicle? I have an ancestor buried there and visit the gravesite occasionally. I also would like to return to Rabbit Hole Springs to do historical research. I would hope that there are, at least, cherry stem roads and parking areas for those unable to walk great distance.				✓
Make sure to follow BLM Nevada OHV guidelines when considering OHV recreation. In particular you should assess future demand for OHV recreation and try to address or meet the demand.	✓			
Please maintain viable recreation opportunities for OHV use. The Black Rock plan is NOT a good example of this. 90% of the once usable area was removed. 10% is not enough and is too limiting for use and access.	✓			
Existing roads and access routes need to remain open.	✓			
For the off hwy vehicle thing, if we the public can't use our lands, then your plan didn't address these issues deep enough.	✓			
Provision for agency/permittee vehicular access to manage grazing and install and maintain range improvements.	✓			
Land classification and disposal issues have resulted in significant changes in public access. Presently, there are large numbers of parcels within the checkerboard lands that may benefit the public for access to public lands. In addition to these opportunities, limited access to the Pine Forest Recreational Area may be of high priority to acquire to sustain the popular use of this area.	✓			
When identifying lands for disposal, please add water, access, minerals and proximity to other commercial areas or historic trails as part of your criteria for selection. Similarly, water, habitat, community water supplies, access and air quality, visual resources should be considered for pieces acquired or disposed of.	✓			

Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Preserve access routes to public lands where access is reasonable or customary. Some access is necessary; some access is often not. Please balance in conjunction with transportation and recreation.	✓			
If ranchers block access, BLM should purchase easements, or condemn private lands if they are an impediment to a long-established right-of-way. Providing a right-of-way across base properties should be a requirement of holding a public lands grazing permit. Private land owners should NOT be rewarded with issuance of a right-of-way if they unlawfully blade roads on public lands, or engage in other such activities to assert a right-of-way.	✓			
I do not support additional management practices that would restrict motorized access or any other access to current WSA or areas that a few people believe have wilderness character. The Wilderness areas that were designated in the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area legislation receive very few visitors throughout the year. It is not multiple use if BLM continues to restrict or special designates additional lands that they already manage for the public. I do not support any new restrictions or special designations. Due to funding, the BLM can not adequately manage existing designations, adding more special designations would not be smart.	✓			
I favor restriction and policing of OHV use to existing roads and the reasonable maintenance.	✓			
Please notify us for the scoping phase of any proposal dealing with ORV management. Including but not necessarily limited to: trail designations, open, limited or closed designations etc. We are particularly interested in any proposals or plans to develop or publicize destination ORV touring or other ORV use areas.	✓			
Recreation is increasingly the highest and best use for BLM lands.	✓			
I camp in your area. The less developed the better!	✓			
We do not believe that there is any need in Northern Nevada for more wilderness areas. Those areas would include Washoe, Humboldt and Pershing counties. The wilderness areas only succeed in taking the land away from the public including the hunters, miners, 4 wheel enthusiasts, senior citizens and children. If you cannot drive on the roads the seniors and/or the kids will not be able to enjoy any of it. For years this area has been the best area in the North of Nevada for hunting (all species) and just getting out in the fresh open air, riding quads, hiking, enjoying the wildflowers, etc. If BLM re-designates any more routes, roads, etc. and makes wilderness areas there will be no hunting, mining, 4 wheeling, etc. or any of the above. The above mentioned fun things to do are our way of life. That is why we live in the Gerlach area to begin with.	✓			
The RMP should address the management and enforcement of off-highway vehicle (OHV) use in the area. OHV management is critical for natural, scenic and cultural resource protection as well as continuation of desirable recreational opportunities for local residents and visitors to the area.	✓			
Don't hesitate to complete your OHV designations, even though you may not have a complete inventory of routes. Again you should set up some	✓			

Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
tentative criteria now to guide your ongoing inventory, then finalize it in your RMP. You can also have some alternative criteria.				
I strongly recommend that the RMP address planned development of "intense" recreation areas. Projections of population, demographics, and related items all point to the need to assure control. over those public recreation activities that would potentially result in significant harm to the lands managed by the WFO.	✓			
I would also hope that through a public hearing process, recreational use will be "guided." I refer here to appropriate signs, limiting vehicle use too close to the trees, providing picnic tables and a barbeque pit in fire safe locations.	✓			
Recreational uses of public lands are burgeoning as populations in the Intermountain West grow.	✓			
The recreation resource on our Nevada public lands is becoming increasing valuable: more people including our members want to recreate on a finite amount of public land. Many recreationists desire solitude, clean air, clean water, vast undeveloped landscapes, and a place to witness healthy natural systems thriving with native plants and wildlife. We would like to see the Winnemucca RMP keep this in mind when making decisions about recreation opportunities. We ask that the BLM consider establishing a special recreation management area (SRMA) for the Lava Beds Complex. This highly scenic area is popular for a variety of recreation uses and is deserving of special management attention. We would be happy to work with BLM staff on specific boundaries.	✓			
Also cite the impacts on air quality when water is removed from the land and how it may affect communities, scenic qualities, water-related recreation and hunting/fishing/birding and more. Address policies for mandatory reclamation if vegetative cover is lost.	✓			
Monitor and crack down hard on irresponsible motorized recreation, and please, take another look at the Burning Man impact. This is not a case of no significance to the playa and never has been. If you really believe that 30K people in one place for a week has no negative environmental impact, hey you'll probably want a coal plant next door, if you get my drift...	✓			
Unauthorized cross county vehicle travel and the continued creation of new routes is a continuing issue. We are looking forward to well thought out off road vehicle management decisions from this RMP. We hope that open areas will be limited to small discrete and well managed areas. We hope that most of the district will be designated as limited to designated routes and that good maps and information will be available to the public on the travel network available for use on lands managed by the Winnemucca Field Office.	✓			
Off road vehicle use of these public lands has had significant changes over the life of the present MFP III. Popular use of all terrain vehicles has increased roads and trails that are now likely to cause undue harm to wildlife and wildlife habitat. Those areas designated as "Open" are in need	✓			

Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
of "Limited" designation. Presently, the Nevada Wildlife Commission has been tasked to find meaningful state regulation to limit the use of these off road vehicles.				
More attention needs to be paid to ORV incursion in wilderness and wilderness study areas; as a forest aid I think several areas need protection - the lava beds among them - and the Smoke Creek Desert in its entirety should be recommended for wilderness study. At the very least it must be taken off the disposable list.	✓			
Will you survey hunters to assess the impact to hunting patterns in advance of the installation of this plant? (It will hardly matter to measure it afterwards.) Have you measured the economic impact for northwestern Nevada of hunting as a recreational practice? If not, why not?	✓			
I support multiple use in this planning area and OHV should continue with all vehicles staying on existing roads, trails and ways.	✓			
What is the total economic impact of Burning Man as an event held annually in the lands under your management? What is the source of, or method used to estimate, this data? What would be the impact to BLM and to the entire northwestern Nevada economy if Burning Man were to leave your district due to this plant?	✓			
Urbanizing California and Nevada are adding pressure on public lands. Environmental protection in California has shifted many of the more invasive activities to Nevada. Because of the Winnemucca Field Office area straddles I-80, the area serves as a gateway for increased recreation. <ul style="list-style-type: none"> • Please address what types of recreation occur and whether or not certain lands should be off limits because of threatened or endangered species or because the area is a water source for a community, or because of Native American religious or traditional issues. • Please address the impacts of OHV's of any type and use the transportation chapter to define where this may occur without upsetting delicate balances within areas such as riparian, streams (perennial or seasonal), or sacred sites. • Please address hunting, fishing, birding, mountain biking, hiking, wildflowers and the importance of scenic qualities to the recreation experience. • Recreational activities such as campfires and catalytic converters on recreational vehicles may cause fires on public lands. Please address this as well. 	✓			
Please designate vehicular and hiking trails in addition to historic trails. Related to recreation and tourism, recreational trails (whether vehicular or hiking/biking/horseback riding) should not be paved and should provide some challenges during travel. Please allow for challenging trails. This relates to the "upgrading" of trail/roads.	✓			
Please address enforcement issues related to OHV traffic.	✓			

Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>Tourism and scenic values: Tourism in the West has always pitched Cowboys and Indians, wide open spaces and clean air.</p> <ul style="list-style-type: none"> • Please develop criteria to protect these within your RMP. <p>Also please identify a few "tours" that people can safely make within the region.</p> <ul style="list-style-type: none"> • Please identify facilities related to tourism, where they are and when they might be sited. • Please identify areas of interest that are cultural, historic or picturesque. • Please highlight the routes of the California Emigrant Trails outside the NCA. • Consider developing the framework for a tourism and recreation plan to follow the RMP. • Fire also plays a role here. Fire affects visual qualities, wildlife, rangeland grazing and facilities. • Please address fire management and the impacts of fire on recreation and wildlife as it relates to scenic values and tourism opportunities. 	✓			
<p>FLPMA requires that BLM prevent unnecessary or undue degradation of the public lands. We are concerned with the proliferation of OHV use by the public, and some livestock permittees. BLM must end all OHV races throughout sensitive special status species habitats. Holding an OHV race in wild lands causes irreparable damage. Trails driven by modern high-powered motorbikes have their soils pounded into concrete, with permanent damage to soils and vegetation. Where trails go up hills, gully formation processes are set in motion. Plus, both the racers and spectators are enticed to re-visit the lands where races occur - with use proliferating in areas where races are held.</p> <p>OHV use should be limited to only existing roads, and only within certain areas. Any trails off the designated roads must be slated for restoration.</p>	✓			
<p>All roads in the important special status species habitats should simply be designated as "Closed" to OHVs - unless they are specifically signed as "Open". A Travel Plan map should be developed as part of the EIS process.</p>	✓			
<p>Access in RR lands, split estate, need to recognize R.S. 2477 roads. Burning Man will replace mining as the main land use.</p>	✓			
<p>All of the WSAs should be designated as limited to designated routes. The routes designated should be only those in existence and in use in 1979 when these areas were designated as WSAs. BLM has a mandate from Congress to protect the wilderness values of these WSAs until such time that Congress makes a wilderness designation decision. In our opinion, the Winnemucca Office personnel have NOT been doing that and the wilderness values of these WSAs are being compromised.</p> <p>As a part of the RMP process, the Winnemucca Field Office must do a comprehensive inventory of all the routes in the WSAs. Using the original inventory maps and aerial photos from 1979, the BLM must clearly identify</p>	✓			

Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>those routes in existence at the time the area was made a WSA in 1979. ALL other routes must be rehabilitated immediately to restore the WSA's damaged wilderness character. This creep of new roads pioneered illegally into these WSAs must stop and the damage be rehabilitated at once. Friends of Nevada Wilderness will be happy to help with the restoration as we have in the designated wilderness areas.</p> <p>There may be cases where routes that were in existence in 1979 should be closed because of damage to natural or cultural resource values. Every route in each of the WSAs should be assessed very closely. We will be happy to assist with that effort as well.</p> <p>There may also be routes which have naturally been reclaimed because they have not been used. These routes should be designated as closed and natural rehabilitation should be encouraged.</p> <p>Having a designation that limits vehicle use to existing routes in wilderness study areas is crazy since the "existing" keeps expanding and expanding over the years. It also "rewards" illegal use and encourages the proliferation of new vehicle routes. This is a problem all over the lands managed by the Winnemucca Field Office but it is a travesty within wilderness study areas.</p>				
<p>Due to the recent public acquisition of lands at and around Knott Creek Reservoir, increased public management of the area will be needed to provide the same conditions that have existed over the last 20+ years with private management of the areas. Roads maintenance is of particular concern due to the effects of weather, wildlife, livestock, and vehicle use.</p>	✓			
<p>Once the legal routes have been identified and decisions made on which additional routes should be closed, the resulting legal vehicle routes in the WSAs should be clearly delineated and be made available to the public on handouts and recreation maps. WSA boundaries need to be signed and it needs to be very clear to the public what is OK to drive on and what is closed within these WSAs.</p>	✓			
<p>I support access to all BLM managed lands on current roads, trails and ways.</p>	✓			
<p>Please designate routes and levels of maintenance for transportation routes. We also recognize that county, state and federal roads and highways are within the RMP area and need to be identified for future capacity levels.</p> <p>Please identify routes (rail, road, air or other) used during potential future industrial development sites</p> <p>BLM lands should be zoned as limited to designated routes. No "off-road" should be allowed.</p> <p>Please designate vehicular and hiking trails in addition to historic trails. Related to recreation and tourism, recreational trails (whether vehicular or hiking/biking/horseback riding) should not be paved and should provide some challenges during travel. Please allow for challenging trails. This relates to the "upgrading" of trail/roads.</p> <p>Please consider the balance between challenge and safety. Remember many opt for challenge. But weigh opportunities and set up criteria for</p>	✓			

Table D-1
Planning Classification for Comments Regarding Recreation, Access, and Transportation *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
determination. Also please consider the cost of construction and maintenance when adding or upgrading roads. Consider NOT upgrading roads; consider eliminating some. Be sure to leave opportunities for solitude outside Wilderness.				
Please address the impacts of water withdrawals, cherrystem roads and air quality within Wilderness and WSA's.	✓			
The best way to protect cultural sites from looting is to limit roading and motorized access to sensitive areas. BLM must analyze significant road closures of salt site roads, or other facility roads (require routine maintenance or salt placement by horseback, limit new livestock developments - that inevitably lead to increased roading), and take other measures to limit ease of access that might damage these sites.	✓			
BLM must identify methods of road closure and restoration.	✓			
Direct effects of roads are destruction of habitat and disruption of dispersal corridors. Indirect effects of roads are cumulative and involve changes in plant and animal community structure and ecological processes. Roads fragment and isolate populations in species that are hesitant to cross them. Direct habitat loss, facilitated invasion of weeds, pests and pathogens, altered predation rates - are all a consequence of roading.	✓			

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-2
Planning Classification for Comments Regarding Land Tenure and Use Management**

Comment	Planning Classification ¹			
	A	B	C	D
1) Does the BLM plan to identify and support disposal of the public land adjacent to the Knott Creek properties as previously agreed, or has this process already been completed?	✓			
2) Will the BLM entertain a direct sale, using a NEPA/Land Use Plan Amendment as originally proposed by Mr. Reed to Mr. Ford (working for The Conservation Fund on RDD, INC.'s behalf)? If the identification of public lands adjacent to the Knott Creek properties has not already occurred, RDD, INC. would like to request a review of land tenures and amendments as appropriate to identify these lands as suitable for disposal. The disposal action by the BLM of these lands would be in the public's best interest due to the facts that: 1) there are many parcels within the checkerboard that could be developed for agricultural purposes, 2) RDD, INC.'s acquisition could allow for the changing of grazing allotments to remove livestock from sensitive areas, and 3) RDD's purchase of the lands would be a benefit to the local tax base.				
In reviewing those [scoping comments provided by the Nevada Clean Energy Coalition] comments, I note that two omissions occurred [from their previous comments]. The first addresses lands identified as "suitable for disposal" under current management plans.	✓			
Consider a reevaluation of how disposal lands will be designated and mapped. The existing Zone 3 map that utilizes a "broad-brush" approach to designating potential disposal lands contains an enormous amount of acreage and is too vague and easily misunderstood by the public and other agencies.	✓			
I think it is important that the Multiple Use approach to these managed lands by the Bureau of Land Management should continue. The National Conservation Area within the Winnemucca district already has limited use in a very large scale throughout the NCA and surrounding Wilderness areas. It is only logical that the remaining lands that this field office manages be opened to the public with the Multiple Use concept applied.	✓			
You need to find a way to maintain the lands identified for sale in the 98 MFP Plan Amendment eligible for Baca (FLTFA) funding. My suggestion is to bring them all forward and then modify it in the RMP by applying the criteria in the MFP using updated resource data. Also I would bring forward the specific criteria from the MFP and apply it in this RMP. Then those same criteria can be applied in the future (adaptive plan) in the future and the lands would still be based on the qualified MFP. The map can be updated based on the original decision then all lands that are disposed would still be eligible under FLTFA. Alternatives could be developed using different criteria.	✓			
Procurement of land currently under review - 1. Time factors, 2. An update on your meeting dealing with recreation usage. Meeting happened about 18 months ago - no follow-up to date.	✓			
I've driven through the High Rock Desert along the Lassen Applegate trail and I'd like that kept open for future generations.				✓

Table D-2
Planning Classification for Comments Regarding Land Tenure and Use Management *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Access in RR lands, split estate, need to recognize R.S. 2477 roads. Burning Man will replace mining as the main land use.	✓			
Nevada is a model to the world for rational regulation, security in land tenure and opportunity for resource development. We all need to work hard to preserve this for the betterment of Nevada and our country.	✓			
Lands should be made available for disposal (sale or exchange) in and around current and future mining operations and ore deposits. Many active mining operations occur on a mixture of public and private land. Privatization of the public portion of the lands alleviates the need for federal resources to manage these mining operations and it would remove the redundancy between the very stringent and comprehensive state program for regulation of mining and the federal program. Such conveyances may also provide economic return for the Federal government.	✓			
The criteria for disposal need to be reviewed as part of the scoping process. There are pluses and minuses regarding land disposal. Each county's outlook on both the criteria and disposal process may vary. In Washoe County, for instance, the amount of private land is limited but proposing sale of public lands raises issues of access, protection of resources, and water availability. The EIS needs to reflect a process, which takes into account national, state, and county approaches to land retention or disposal.	✓			
In your land tenure section, there should be a section stating that any inholdings within a wilderness study area or adjacent edgeholdings that are acquired through land exchanges, acquisitions, donations, etc. will be managed identically to those of the surrounding or adjacent wilderness study area. Had these lands been public at the time of the intensive inventory, they would have been included as part of the wilderness study area. It is critical to protect these values so wilderness characteristics are not lost.	✓			
Population growth should also be projected in regard to the need for private lands to accommodate such growth. Public land surrounding communities in the Winnemucca District should be made available for disposal. Some communities do not have adequate private land surrounding communities to permit well managed growth opportunities.	✓			
As for land tenure, I find it outrageous that the Smoke Creek Playa is designated for possible disposal. This is a unique and pristine area in many ways more interesting (and certainly less disturbed) than the Black Rock and deserves protection and preservation.	✓			
Provision for exchange/disposal of land and ways to make permittees whole if grazing area is removed from allotments.	✓			
Preserve the Smoke Creek! It's bounded by WSA's and an amazingly untouched space of undeniable beauty. Attention should also be paid to the "lava beds" Bluewing mountains and playa, Porter Spring (preserve historic - mining - artifacts, particularly that ancient dumptruck) too much to list but the Smoke Creek should not be on the disposal list - that's crazy!	✓			

Table D-2
Planning Classification for Comments Regarding Land Tenure and Use Management *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Subdivision or other development of checkerboard land threatens future fragmentation of sagebrush and salt desert shrub communities.	✓			
Try to address mining and mine closure by establishing reclamation standards. You could also set criteria for land disposal to improve the opportunities post mine uses. The criteria might be something like if the lands and/or facilities would not have a general public benefit or use, or might have long term hazards or public liability, they would be sold. You could certainly identify existing sites that meet the criteria and later apply the criteria to other locations as things change, either to dispose or retain.	✓			
As stated in the Special Management Area section, there needs to be language stating that any inholdings within a wilderness study area or adjacent edgeholdings that are acquired through land exchanges, acquisitions, donations, etc. will be managed identically to those of the surrounding or adjacent wilderness study area. Had these lands been public at the time of the intensive inventory, they would have been included as part of the wilderness study area. It is critical to protect these values so wilderness characteristics are not lost or diminished by inappropriate or conflicting uses. We would like to see a strategy developed in the RMP to address the management challenges of the checkerboard land along the railroad within the Winnemucca Field Office boundaries. We believe there are public lands in the checkerboard area that would be better suited in private ownership and available to the local communities for economic development. It is important however, that existing public access in the checkerboard region be maintained or acquired as needed through easements with private landowners. While we strongly support privatizing lands adjacent to communities for needed community services and development, we are opposed to lands leaving public ownership for non-public reasons. We support lands being made available to the counties for parks or open spaces.	✓			
Land classification and disposal issues have resulted in significant changes in public access. Presently, there are large numbers of parcels within the checkerboard lands that may benefit the public for access to public lands. In addition to these opportunities, limited access to the Pine Forest Recreational Area may be of high priority to acquire to sustain the popular use of this area.	✓			
Realty actions: <ul style="list-style-type: none"> • Please review your identification of lands for acquisition and disposal and outline clearly why the BLM would dispose or acquire. • Smoke Creek Desert should be designated as Zone 1 (lands to be retained in public ownership). • Please add consideration of neighbors and compatibility with the neighbors, and indicate their interests are important in land use decisions. • When identifying lands for disposal, please add water, access, minerals 	✓			

Table D-2
Planning Classification for Comments Regarding Land Tenure and Use Management *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>and proximity to other commercial areas or historic trails as part of your criteria for selection.</p> <ul style="list-style-type: none"> • Similarly, water, habitat, community water supplies, access and air quality, visual resources should be considered for pieces acquired or disposed of. • We recognize that communities within this RMP may rely on the release of public lands for community development. Work with communities to identify what lands surrounding existing communities are needed and whether or not water, infrastructure and services are affordable and available. Land by itself is not enough. • Encourage sustainable compact development in your RMP. • Develop a framework for land consolidation in areas where it may be desired. Checkerboard lands are problematic, but may work around local communities. • Preserve access routes to public lands where access is reasonable or customary. Some access is necessary; some access is often not. Please balance in conjunction with transportation and recreation. 				
<p>I support current management practices. I support current lands available for disposal, as long as they are not supportive of a fossil fuel project. I also support no limitation on wind energy development or other renewable energy projects. I support withdrawal of all fossil fuel projects in this planning area. Lands for disposal should be considered for renewable projects and not fossil fuel projects. I support exchanges, trading and purchasing of lands of high resource value especially if they support renewable energy or agricultural projects. I do not support future communication sites to be located at existing communication sites. I do not support eliminating all "planning corridors" in the previous MIPS. I do not support exchanges, trading or purchasing of lands for fossil fuel development.</p>	✓			
<p>BLM should pursue acquisition of additional lands located in key habitat areas identified in the EIS process, with BLM acquisition of private inholdings through purchase with Land and Water Conservation funds or other conservation funding.</p> <p>BLM should strive for no net loss of public lands, including retention of significant blocks of lands where checkerboarding now exists.</p>	✓			
<p>BLM must strengthen environmental protection for all rights-of-way on EIS lands. Protections include: Limiting use during sensitive-nesting, fawning, wintering or other periods of use for all native wildlife, assessing impacts of rights-of-ways on spreading exotic species onto surrounding lands and revocation of rights-of-way when weed infestation or wildlife disturbance results. BLM's planning process must not authorize new utility corridors, and must re-examine the suitability of existing corridors. All direct, indirect and cumulative impacts of mining, wind, geothermal, and other energy development on populations of special status species or</p>	✓			

Table D-2
Planning Classification for Comments Regarding Land Tenure and Use Management *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
aquifers across the EIS region must be considered.				
BLM's planning process must not authorize new utility corridors. These corridors open the way for a proliferation of energy developments, and have significant environmental impacts that are directly counter to the goal of restoration.	✓			
Criteria for revocation of rights-of-way if environmental harms (weed spread, significant wildlife disturbance) are occurring must be established. A bonding requirement for any right-of-way must be established by this RMP. The bond must be sufficient to restore the land at the termination of the right-of-way, as well as to mitigate all environmental harms that stem from right-of-way construction and other or ongoing activities.	✓			

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**Table D-3
Planning Classification for Comments Regarding Fire Management, Vegetation Management, and Exotic Species**

Comment	Planning Classification ¹			
	A	B	C	D
Livestock grazing for fire management to control underbrush fuel for fire.	✓			
Grazing is a useful tool for reducing fuels that lead to devastating wildfires.	✓			
There is less and less grazing and consequently, more fuel for fire residue is being left to fuel load out Public Lands.	✓			
Emphasis on fire and rehabilitation/management with allowance for grazing as a tool in fire prevention.	✓			
At this point in the wilderness areas that have already been designated, the BLM has little control over the weeds, not much better control for fire, and very little concern for those people who live and work in this area. Making more wilderness areas appears to be a means for BLM to justify their own existence and not for the good of the land, the animals, or the population.	✓			
Fire also plays a role in a watershed, so please address fire management for watersheds.	✓			
There is enough defacto wilderness now. The Plan should implement fuel reduction grazing, i.e., March April in areas of cheatgrass, not take non-use for 2-3 yrs. While the cheatgrass comes back and continues to build up. Then it can make another run, "the fire" into the sagebrush that was left before.	✓			
I support current management conditions of wildfires and prescribed burns. There should be full suppression of fires in sagebrush areas that have a potential for cheat grass invasion or removal of sagebrush communities.	✓			
Please address fire management and the impacts of fire on recreation and wildlife as it relates to scenic values and tourism opportunities.	✓			
A minimum period of five years rest from livestock grazing following any wild fire must be standard operating procedure on EIS lands. This is necessary to allow recovery and establishment of native species. Grazing should then be allowed only if specific measurable criteria for establishment of native vegetation and microbiotic crusts have been met.	✓			
Only native species should be used in any post-fire seeding effort - or in any seeding effort (such as road rights-of-way, areas where cow troughs are removed) in EIS lands.	✓			
BLM should not construct new or temporary fences in burned lands. The already existing pasture fences should be used to control livestock. Electric fences very often fail, and burn trespass occurs. Any livestock trespass of burns or areas being rested from grazing must result in permit action against the responsible permittee. The public's investment in fire rehab is often tens of thousands of dollars, and it can be destroyed through trespass.	✓			
The old paradigm for rangeland vegetation condition has been replaced by the state and transition model paradigm. This allows the BLM to identify the states that are desired and to focus management of various types of actions on the avoidance of crossing ecological thresholds. This is the time to focus the public on their vision for healthy rangelands that maintain their resiliency and thus avoid the risk of them becoming problematic for future generations.	✓			

Table D-3
Planning Classification for Comments Regarding Fire Management, Vegetation Management, and Exotic Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
BLM is required under FLPMA to consider present and potential uses of the public lands, and the scarcity of values involved. The sagebrush sea, salt desert shrub, aspen pockets, mahogany thickets, playas, scarce streams, springs and seeps, clear air, and wild roadless lands of the Planning area are important examples of the wide-open country that once characterized the American West. Recent scientific assessments conducted under the Interior Columbia Basin Ecosystem Management Project (ICBEMP) such as Wisdom et al. 2000 recognize the importance of protecting and enhancing native plant communities for the long-term persistence of sagebrush biota, as well as the grave threats of growing exotic species invasions that could ultimately doom these lands. (Wisdom 2000).	✓			
Suppress wildfires and protect against wildfires that remove large amounts of sagebrush communities which allow cheat-grass infestations. It is important to maintain healthy vegetation communities.	✓			
Land use activities, climate, juniper invasion and wild fires continue to impact and threaten the Shrub-Steppe Communities in northern Nevada. Sagebrush delineation and assessments for the Great Basin should provide the priority and emphasis of new land use plan direction and decisions. Recent concerns on the status of sage grouse, pygmy rabbit and sagebrush obligate passerine birds will require more specific decisions.	✓			
Aspen communities remain a key wildlife habitat in the influence of the Winnemucca Field Office. Inventory data collected in the previous land use planning effort should be compared to the present data to evaluate the implementation of the present land use plan. Wildlife values of riparian areas have not altered in the past two decades, but federal land managers now recognize the importance of this habitat to neotropical migrant birds and nesting raptors.	✓			
Subdivision or other development of checkerboard land threatens future fragmentation of sagebrush and salt desert shrub communities.	✓			
Riparian habitat restoration remains the primary issue of the existing land use plan, federal policy and Range Reform Regulations. Rangeland Health Assessments and Stream Surveys have been completed and regulatory actions are well defined. Wildlife dependency on these critical riparian areas have been documented and supported in conservation plans, multiple use decisions, habitat management plans and the present Standards and Guidelines. This new planning effort has the opportunity to build on the existing strength of the MFP III and implement known management practices that will result in measurable improvement of riparian habitats. Implementation of conservation measures in planning efforts for sage grouse, passerine birds, Lahontan cutthroat trout and sensitive species will be a function of this new land use plan.	✓			
At present, BLM has very little current information on ecological conditions and the health of native plant communities across the landscape. When BLM conducted its limited and narrow FRH assessments and	✓		✓	

Table D-3
Planning Classification for Comments Regarding Fire Management, Vegetation Management, and Exotic Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
allotment evaluations, it relied on data that was largely a decade old.				
The focus of this RMP must be to remove projects to facilitate restoration of native plant communities.	✓			
BLM must use current ecological science to develop a range of alternatives that act to protect remaining native vegetation communities from activities that result in disturbance that could lead to weed invasion/proliferation of exotic species that threaten sagebrush salt desert shrub, pinyon-juniper and other vulnerable vegetation communities, and their ultimate further fragmentation. Protection of these communities is the first step to ensuring that their ultimate restoration may be possible. BLM must conduct a current inventory of native plant community condition and restoration needs.	✓			
BLM must identify lands in the allotments to be restored to native vegetation. These include: exotic seedings, annual exotic communities, livestock-damaged native communities, areas highly impacted by livestock facilities or management activities.	✓			
We would like to have considered under "noxious weeds" two programs that the BLM is currently conducting within our area, and throughout the District. First is the green stripping program that has been conducted within Paradise Valley. Large strips of land have been brush beaten during the last year or so. We understand this is an attempt to disrupt the monotone of the sagebrush steppe, and at this point it has accomplished that. However, our concern is that when sagebrush is removed, and nothing is added to the disturbed area, the opportunity for invasive annual species to invade is greatly enhanced. Logically this can increase the possibility of destructive fire. However, in addition to such invasive annuals as cheat grass, there are certainly less desirable species that can also invade, including but not limited to; medusa head, Russian knapweed and other equally troubling noxious weeds. We are not against green stripping, but we strongly urge your considerations in regard to taking additional steps with appropriate revegetation once the sage is removed. We firmly believe this must be considered in your RMP. The second area of concern includes the annual disking that occurs along major travel routes within the District. We note that at least both sides of State Routes 290 and 140, as well as Federal Route 95 are disked on an annual basis as a deterrent to fire. We appreciate the effort put forth from a fire retardant standpoint. However, if the disking were ever stopped for any reason, our experiences are such that we know these areas would be invaded on better sites with the likes of cheat grass, and on poorer sites with Russian knapweed, which of course is a noxious weed. Again we strongly urge that through your RMP process that these matters be given careful consideration.	✓		✓	
Making sure that provision is included in the RMP for prevention and/or control of invasive species--particularly in specially designated areas such as wilderness or wilderness study areas.	✓			
The Winnemucca lands provide great opportunities for BLM to actually	✓			

Table D-3
Planning Classification for Comments Regarding Fire Management, Vegetation Management, and Exotic Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
fulfill its duties under FLPMA, and act to stop further ecological harm from occurring to relatively intact landscapes; to undertake meaningful conservation actions to enhance and restore damaged or degraded sites within these lands (i.e. restore de-watered springs; control and obliterate unneeded roading that has grown up without authorization as livestock projects or activities have occurred, such as roads to salting sites); remove harmful livestock projects that may be fragmenting sage grouse or other habitats and may be serving as epicenters of weed invasion; and to restore composition, structure and function of sagebrush communities.				
At this point in the wilderness areas that have already been designated, the BLM has little control over the weeds, not much better control for fire, and very little concern for those people who live and work in this area. Making more wilderness areas appears to be a means for BLM to justify their own existence and not for the good of the land, the animals, or the population.	✓			
Control of noxious weeds.	✓			
It is important to have many tools available in-order to eradicate and control invasive species. I support the use of numerous tools (i.e. chemical, mechanical and biological control tools). BLM should continue supporting cooperative weed management areas.	✓			
Cheatgrass (all invasives) is nature's way of pointing out how badly we've been <i>[expletive]</i> up: control and remediation are urgently needed	✓			
BLM must identify lands in the allotments to be restored to native vegetation. These include: exotic seedings, annual exotic communities, livestock-damaged native communities, areas highly impacted by livestock facilities or management activities.	✓			
Water hauling is associated with a great risk of weed infestation and spread (regular vehicle trips through weed-infested roads and, roadsides, and then deposition of weed seeds in areas of livestock disturbance and ready dispersal). BLM should not continue allowing water hauling.	✓			
Many weedy plants dominate and disperse along road sides. Opportunistic animals benefit from roads. Edge effects are now seen as harmful consequences of habitat fragmentation for many native species. Indirect effects include increased human access, OHV use, hunting, human-caused wildfires, Roads diminish native diversity of ecosystems.	✓			
Powerlines Dissect Wildlife Habitat, Provide Raptor Perches, Result in Increased Predator Travel Corridors and Weed Spread	✓			
BLM must take all possible steps to prevent the spread of weeds into native vegetation communities. Weeds are spreading at alarming rates on arid western lands. BLM must first recognize that domestic livestock are the primary cause of weed infestation on BLM lands. Livestock: Travel cross-country transporting weed seeds in mud on hooves, in fur, in feces. They create zones of intensive disturbance that are ideal sites for initial infestation by weeds. They prime sites for weed invasion by harming and weakening native plant communities, providing bare soil sites for aggressive exotic species invasion.	✓			

Table D-3
Planning Classification for Comments Regarding Fire Management, Vegetation Management, and Exotic Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
BLM must inventory all lands and assess their vulnerability to weed infestation. Strong preventative measures necessary to stem and reverse the tide of weed invasions must be identified and put into action. In the past BLM has shrugged off and ignored the role of livestock in weed infestation. Its only attempt at control was spraying the most obvious weed patches, taking no efforts to revegetate the "naked" sprayed sites, and continuing to let livestock graze as normal and continue to spread weeds. This head in the sand approach has resulted in the alarming weed problem we now face. Knapweeds are rapidly expanding in Planning area lands. These are spread by livestock, and once established in disturbed areas move aggressively into surrounding lands. They are also spread along disturbed road areas, and by vehicles.				
Roads and vehicles are also a major source of weed transport, and soil disturbance that creates ideal sites for weed infestation. Banning cross-country travel by ORVs, closing and restoration of roads and ways in wild lands "at risk" for weed invasions are logical ways to limit spread of weeds. Limiting road maintenance activities is also important, as the blading of ever-widening shoulders on gravel and dirt roads provides an ideal site for weed infestation and then outward spread.	✓			
Various mineral and energy exploration activities involve significant cross-country travel by heavy equipment that disturbs soils and/or spreads weed seeds. These activities should be prohibited in all lands with known weed infestation, or which are identified as being "at risk" for weed invasion or spread.	✓			
BLM's RMP must make land use allocations that prevent lands from undergoing weed infestation. As you may be aware, WWP, CHD, ALA, NCAP and others have submitted a Citizens Alternative to BLM for its Weed EIS (which appears to have been put on permanent hold ???). Our alternative addresses causes of weed infestation, and provides actions to address those causes. These actions include changes/reductions/cessation of livestock grazing, road closure and other actions that are aimed at effectively addressing causes of weed invasion and spread. We have been endlessly told by Brian Amme, BLM's Weed EIS planner that it is at the RMP level where BLM makes forage allocations and other decisions that address causal factors of weed invasion. So, according to BLM's own planners like Mr. Amme, it is BLM's task, in the RMP to effectively address causes of weed invasion.	✓			

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B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-4
Planning Classification for Comments Regarding Wildlife Habitat and Special Status Species**

Comment	Planning Classification ¹			
	A	B	C	D
<p>BLM is required under FLPMA to consider present and potential uses of the public lands, and the scarcity of values involved. The sagebrush sea, salt desert shrub, aspen pockets, mahogany thickets, playas, scarce streams, springs and seeps, clear air, and wild roadless lands of the Planning area are important examples of the wide-open country that once characterized the American West.</p> <p>Recent scientific assessments conducted under the Interior Columbia Basin Ecosystem Management Project (ICBEMP) such as Wisdom et al. 2000 recognize the importance of protecting and enhancing native plant communities for the long-term persistence of sagebrush biota, as well as the grave threats of growing exotic species invasions that could ultimately doom these lands.</p>	✓			
<p>Wilderness values are closely linked in our desert area with water resources. There should be no decisions made by the BLM that would adversely affect the quality, quantity or sustainability of our wilderness water resources.</p>	✓			
<p>We, the public worked with the wetlands, riparian and God only knows what now which were ways in which to reduce even further the numbers of livestock. Oh, and don't forget the slope of steepness in the late 70s. That came before the other 2.</p>	✓			
<p>This comment appears to be in the "Wildlife/sensitive species" Issue. In the "Endangered Species Act of 1973," Congress gave authority and responsibility for designation of endangered and threatened species to the U.S. Fish and Wildlife Service. While "sensitive" species designation in the RMP and follow-on documentation may be a noble effort, without uniform criteria and the ability to uniformly enforce those criteria, the designations may not be in the best interest of the taxpayer. The U.S. Fish and Wildlife are charged with responsibility for protecting this portion of our environment. Development of and application of "pre-endangered/threatened" designations will require use of BLM resources and will be a source of potential highly emotional issues. Again, this may not be the best use, from a taxpayer standpoint, of BLM funds for an "overlap" of responsibility among government agencies. Why should the BLM act independently of the Fish and Wildlife Service?</p>	✓			
<p>Standards for Rangeland Health require that habitat conditions of the public lands meet the life cycle requirements of special status species. Under the principles of ecosystem-based management, species at risk of being listed under the Endangered Species Act are managed to prevent the need to list under the ESA.</p> <p>The Long-Billed Curlew (<i>Numenius omericanus</i>) has been documented and photographed displaying nesting behavior in the Winnemucca Field Office Planning Area. The Long-billed curlew is considered a "critically-imperiled" shoreline species by the U.S. Shorebird Conservation Plan. The BLM is a member of the U.S. Shorebird Planning Council and helped develop the plan. The Nevada BLM State Office has designated the Long-billed Curlew to be a proposed Nevada Special Status Species.</p>	✓			

Table D-4
Planning Classification for Comments Regarding Wildlife Habitat and Special Status Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
There is an essential need for BLM to identify and retain under special management any BLM lands which host water sources and thereby provide limited but essential habitats for so many of our wildlife species and, in some instances, special vegetative or invertebrate species.	✓			
Current scientific information indicates that the Long-billed Curlew must be addressed as a sensitive avian species under the proposed Resource Management Plan and its habitat requirements, which are benefited by livestock grazing, be incorporated into relevant BLM standards and management programs.	✓			
The Winnemucca lands provide great opportunities for BLM to actually fulfill its duties under FLPMA, and act to stop further ecological harm from occurring to relatively intact landscapes; to undertake meaningful conservation actions to enhance and restore damaged or degraded sites within these lands (i.e. restore de-watered springs; control and obliterate unneeded roading that has grown up without authorization as livestock projects or activities have occurred, such as roads to salting sites); remove harmful livestock projects that may be fragmenting sage grouse or other habitats and may be serving as epicenters of weed invasion; and to restore composition, structure and function of sagebrush communities.	✓			
Jack Walters, one of Nevada's pre-eminent bird watchers, first brought to the birding world attention, the existing of Porter Springs located near Lovelock. Because the springs provide one of the few resting and feeding sites for many migrant birds, Porter Springs soon became a regular visiting site for birders. The list of species located at the site is extensive. BLM owns the land around the spring. Ideally, an agreement with the water right owner will result in the type of management, which continues to recognize the importance of the trees, water, and understory for migrating birds. We are asking that Porter Springs be considered for special management such as an ACEC, which can result in protective measures such as fencing to keep the burros out.	✓			
BLM needs to make clear at the very beginning of the EIS process that there are a host of other important and significant public lands values in these lands, so that protection and enhancement of these values will drive the EIS effort and a range of reasonable alternatives, its land management decisions, and habitat enhancement or restoration actions.	✓			
Land use activities, climate, juniper invasion and wild fires continue to impact and threaten the Shrub-Steppe Communities in northern Nevada. Sagebrush delineation and assessments for the Great Basin should provide the priority and emphasis of new land use plan direction and decisions. Recent concerns on the status of sage grouse, pygmy rabbit and sagebrush obligate passerine birds will require more specific decisions. Long-term trend data for mule deer and antelope populations follow the trends in wild fire loss, juniper invasion and ungulate impacts to understory plant communities. The Field Office's implementation of existing MFP III Decisions and Rangeland Standards and Guidelines require rangeland monitoring studies to support any future land use that proposes a real or	✓			

Table D-4
Planning Classification for Comments Regarding Wildlife Habitat and Special Status Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
potential threat to these habitats.				
Aspen communities remain a key wildlife habitat in the influence of the Winnemucca Field Office. Inventory data collected in the previous land use planning effort should be compared to the present data to evaluate the implementation of the present land use plan. Wildlife values of riparian areas have not altered in the past two decades, but federal land managers now recognize the importance of this habitat to neotropical migrant birds and nesting raptors. Environmental assessments and rangeland monitoring data have now better defined the impacts of livestock and climate on the propagation of these aspen clones in the Great Basin. New data and management practices must be strengthened to meet rangeland health criteria of the federal regulations.	✓			
Public lands should not be closed to multiple use just because a sensitive resource exists on that land. BLM has numerous tools, such as the Endangered Species Act, to ensure the protection of such resources while allowing other multiple uses, such as mining to occur.	✓			
While recognizing, protecting, and enhancing special status species habitats and other values, BLM must also grapple with ongoing livestock grazing degradation of riparian areas and uplands in portions of these allotments; invasive species (primarily caused or extended by livestock disturbance, facilities and/or roading); fragmentation caused by grazing installations/livestock facilities, fire and other factors; OHV use exacerbated by livestock facility-associated roading; and other impacts of livestock grazing that are increasingly fragmenting sagebrush habitats.	✓			
Special status species management that provides for continued livestock use in management and recovery plans.	✓			
Any other BLM lands which surround water sources should receive special recognition and management.	✓			
I respect regulating for cultural, T&E habitat.	✓			
Additionally, keeping water within its water basin is critical to wildlife and plants that make the West a desirable place to live and recreate. Please consider developing criteria to keep water in its basin of origin with minor exceptions.	✓		✓	
I do not believe that BLM should use the same level of protection for sensitive species as it does for threatened and endangered species. I would like to see the BLM remove the current status of sensitive species.	✓		✓	
Riparian habitat restoration remains the primary issue of the existing land use plan, federal policy and Range Reform Regulations. Rangeland Health Assessments and Stream Surveys have been completed and regulatory actions are well defined. Wildlife dependency on these critical riparian areas have been documented and supported in conservation plans, multiple use decisions, habitat management plans and the present Standards and Guidelines. This new planning effort has the opportunity to build on the existing strength of the MFP III and implement known management practices that will result in measurable improvement of riparian habitats. Implementation of conservation measures in planning efforts for sage grouse, passerine birds, Lahontan cutthroat trout and sensitive species will	✓			

Table D-4
Planning Classification for Comments Regarding Wildlife Habitat and Special Status Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
be a function of this new land use plan.				
Special attention to soils and water conservation; make mines absolutely responsible for complete cleanups and restoration of watersheds.	✓		✓	
The Bureau of Land Management recently completed its Sensitive Species List for Nevada. At this time we wish to highlight those species dependent upon those habitat types mentioned above: Pygmy rabbit, Townsend's big-eared bat, big brown bat, spotted bat, hoary bat, Fletcher dark kangaroo mouse, California myotis, small-footed myotis, Yuma myotis, western pipistrelle bat, Preble's shrew, Brazilian free-tailed bat, burrowing owl, northern goshawk, golden eagle, short-eared owl, Swainson's hawk, greater sage grouse, snowy plover, prairie falcon, Peregrine falcon, sand hill crane, loggerhead shrike, Colombian sharp tailed grouse and short-horned lizard.	✓			
BLM must collect adequate baseline biological data on wildlife habitats and populations and vegetation and other ecological conditions in the EIS lands. This will require a minimum of two years of intensive effort, and must include new on-the-ground inventories for special status species and analysis of habitat conditions for these species. This information must be thoroughly and systematically collected, as it will be used in developing the EIS that will govern management here for the next decade or longer.	✓			
The proposed Lava Beds SRMA Complex is characterized by incredible granite geology speckled with lush springs. The area north and west of this consists of slowly undulating valleys, marked with numerous washes that lead up to gently sloped peaks of over 6,000 feet. Mule deer, bobcats, wild horses, burros and chukar can be found there, along with resident pronghorn which utilize the valley bottoms. Numerous bird species can also be found including the golden eagle, spotted towhee, Say's phoebe and loggerhead shrike. The area supports at least one sensitive Nevada endemic forb species, the winged milkvetch (<i>Astragalus pterocarpus</i>). The proposed Lava Beda SRMA complex also includes portions of two Nature Conservancy portfolio sites, Kurniva Valley (A146) and Lava Beds Creek (A148), selected as such on the basis of their sagebrush semi-desert ecosystem conservation values.	✓			
Brush management flexibility that provides for sagebrush reduction where fire is a threat to special status species habitat and where encroachment in range improvement seedings is limits forage production and habitat value.	✓			
Identify the criteria for siting utilities and facilities such as water availability, access and routes, new impacts, visual degradation, impairment of habitat for wildlife, wild horses, or humans and public health.	✓			
When identifying lands for disposal, please add water, access, minerals and proximity to other commercial areas or historic trails as part of your criteria for selection. Similarly, water, habitat, community water supplies, access and air quality, visual resources should be considered for pieces acquired or disposed of.	✓			
Please address what types of recreation occur and whether or not certain lands should be off limits because of threatened or endangered species or	✓			

Table D-4
Planning Classification for Comments Regarding Wildlife Habitat and Special Status Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
because the area is a water source for a community, or because of Native American religious or traditional issues.				
Please address the impacts of OHV's of any type and use the transportation chapter to define where this may occur without upsetting delicate balances within areas such as riparian, streams (perennial or seasonal), or sacred sites.	✓			
BLM should not allow Temporary Non-Renewable Use (TNR) on these lands through this EIS process. TNR use is not compatible with restoration of damaged plant communities, protection of special status species habitats, or maintenance of wildlife populations. TNR has typically occurred in the winter - when there are significant conflicts between wintering wildlife and human intrusion on special status species, raptor, big game and other winter habitats. Plus, in many areas where TNR has been issued, smaller native bunchgrasses may be growing, microbiotic crusts extensively trampled under muddy conditions, and sagebrush consumed as winter browse.	✓			
BLM must strengthen environmental protection for all rights-of-way on these lands. Protections include: Limiting use during sensitive nesting, fawning, wintering or other periods of use for all native wildlife, assessing impacts of rights-of-way currently held on spreading exotic species onto surrounding lands. Criteria for revocation of rights-of-way if environmental harms (weed spread, significant wildlife disturbance) are occurring must be established.	✓			
As suggested in the evaluations, terrestrial wildlife requires additional forage allocation outside of the parameters of the present and proposed future implementation phases of land use planning.	✓			
Existing MFP III Decisions provide excellent Guidelines to address mule deer habitat protection and enhancement. Nevada Department of Wildlife has extensive population and trend data to assess in relationship to habitat data collected by the Field Office. These data can be presented in the pending environmental impact statement to support more meaningful and specific decisions for the Resource Management Plan. Pronghorn antelope population trends have shown interesting responses to wild fires, water development and land use practices. Pronghorn immigration into Pershing County has created a large flaw in the present land use plan. Water development and other range impacts require additional attention to better manage for this expanding population of antelope.	✓			
Bighorn Sheep have been re-established through the implementation of Habitat Management Plans and Plans of Operations under the present MFP III Decisions. Land use conflicts have been mitigated, but additional measures must be taken to fulfill the Bureau of Land Management Bighorn Policy. Buffers between domestic and bighorn have not met the 9 mile criteria and domestic sheep trailing routes need to be fully assessed. Water developments have started the necessary mitigation for other adverse land uses and a more comprehensive program will require additional decisions in the Resource Management plan.	✓			

Table D-4
Planning Classification for Comments Regarding Wildlife Habitat and Special Status Species *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Rocky Mountain elk are native specie immigrating into Nevada from adjacent states. The Nevada Elk Species Plan includes habitats within the influence of this plan and decisions are necessary to support pioneering and introductions in the near future.	✓			
BLM must assess the impacts of predator control actions across these lands on special status animal species and native plant communities. BLM must outlaw aerial gunning of coyotes - which causes intrusive disturbance in wildland areas and may disturb sensitive wildlife species during critical periods of the year. Activities of Wildlife Services can damage public lands.	✓			
Water supplies and quality: In the high desert, water is always critical to plants, animals and humans. <ul style="list-style-type: none"> • Please consider what watersheds provide water to rural communities and how activities may impact the water supply and quality. As an example, the Granite Range provides the watershed for Gerlach's drinking water. The GID is spending large sums of money to improve its water quality. To ignore or undo that effort seems counter-productive. Similar circumstances may surround other communities such as Summit Lake, Denio, Lovelock and Winnemucca. Protecting water quality is paramount. • Please consider water supply and quality as key criteria in making land use decisions. • Additionally, keeping water within its water basin is critical to wildlife and plants that make the West a desirable place to live and recreate. Please consider developing criteria to keep water in its basin of origin with minor exceptions. • Also cite the impacts on air quality when water is removed from the land and how it may affect communities, scenic qualities, water-related recreation and hunting/fishing/birding and more. Address policies for mandatory reclamation if vegetative cover is lost. • Fire also plays a role in a watershed, so please address fire management for watersheds. • Water quality and supply are also affected by mercury from mining and potentially from coal fired power plants. Please discuss this as a topic within the RMP. 	✓			✓

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses**

Comment	Planning Classification ¹			
	A	B	C	D
I am concerned at the increasing “lock it away” you can’t have it (like fossils or “rare” species) attitude of people who never go into the field. If there were scientists who came out – let them. Give them a dig and be done with it...I guess I’m afraid of being regulated out of our American prospecting lifestyle because we can’t pay through the nose to document how green we are. After what has happened in some other BLM regulated area (like S. Cal or WA) that has locked out many weekend recreationalists, Nevada needs to be open-not sold off and better enforcement of existing laws instead of making the penalties so big you scare everybody out.	✓			
Small-scale mining activities such as panning, placering, dry washing, and metal detecting need to be continued and encouraged.	✓			
The BLM should do everything in their power to stop the process and construction of the coal-fired energy plant planned by SEMPRE Energy in the Gerlach area. This plant will contaminate our soil, water and air, and greatly effect our quality of life. This plant will not benefit this area as all the power generated will go to California. Let California build their own plant. Keep the pollution in their state.	✓			✓
I am interested in seeing access to federal lands remaining open for responsible development of mineral resources (hard minerals, geothermal, oil and gas). Nevada is a model to the world for rational regulation, security in land tenure and opportunity for resource development. We all need to work hard to preserve this for the betterment of Nevada and our country.	✓			
Access in RR lands, split estate, need to recognize R.S. 2477 roads. Burning Man will replace mining as the main land use.	✓			
Population growth and the commensurate need for metals from mining should be evaluated. Per the Mineral Information Institute, a new born baby in the United States will consume in its lifetime 3.6 million pounds of metals, minerals and fuels. The BLM should evaluate projected population growth in the United States and the commensurate need for materials over the anticipated life of this RMP to provide for a projection of the need for public lands in the district for the extraction of these metals, minerals and fuels. Socioeconomics and the positive impacts resultant from mining on the economies in the Winnemucca district should be evaluated.	✓			
Lands should be made available for disposal (sale or exchange) in and around current and future mining operations and ore deposits. Many active mining operations occur on a mixture of public and private land. Privatization of the public portion of the lands alleviates the need for federal resources to manage these mining operations and it would remove the redundancy between the very stringent and comprehensive state program for regulation of mining and the federal program. Such conveyances may also provide economic return for the Federal government.	✓			
I encourage development of the geothermal resource within this planning area. There should not be any "No Surface Occupancy" stipulation on any new leases within this planning area.	✓			
Lands should continue to be available to provide infrastructure for mining	✓			

Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>such as access roads, power line corridors and pipeline corridors.</p> <p>Public land should continue to be available for mineral exploration and development, including the location of mining claims and mill sites under the Federal Mining Law.</p> <p>Public lands should not be closed to multiple use just because a sensitive resource exists on that land. BLM has numerous tools, such as the Endangered Species Act, to ensure the protection of such resources while allowing other multiple uses, such as mining to occur.</p> <p>Mechanisms should be in place to provide for post mining land use that supports community needs. Mining operations have infrastructure such as roads, water, and power that could subsequently be used by the public for various beneficial uses. Mining operations also present future opportunities for historic preservation. Northern Nevada is one of the richest gold mining districts in the world, the state was founded on mining, and mining continues to have a significant positive impact on rural communities in Nevada.</p>				
Try to address mining and mine closure by establishing reclamation standards. You could also set criteria for land disposal to improve the opportunities post mine uses. The criteria might be something like if the lands and/or facilities would not have a general public benefit or use, or might have long term hazards or public liability, they would be sold. You could certainly identify existing sites that meet the criteria and later apply the criteria to other locations as things change, either to dispose or retain.	✓			
Water quality and supply are also affected by mercury from mining and potentially from coal fired power plants. Please discuss this as a topic within the RMP.	✓			
Please identify potential or future industrial sites or areas such as mining areas or mines or factories similar to the Empire gypsum plant, Eagle-Picher, and others that could surface in the next 20 years.	✓			
Please indicate where potential gas lines, power lines, water lines, rail lines and roads necessary to service or maintain such utilities and facilities might be located.	✓			
<p>When identifying lands for disposal, please add water, access, minerals and proximity to other commercial areas or historic trails as part of your criteria for selection.</p> <p>Similarly, water, habitat, community water supplies, access and air quality, visual resources should be considered for pieces acquired or disposed of.</p>	✓			
While we realize that the natural gas potential is somewhat limited in this area, this is the exact reason we at AGA feel that it is necessary to encourage BLM to take into account the growing energy crisis in the United States. We speak for our members as well as natural gas consumers.	✓			
I favor exploring alternative energy solutions so long as the impact on the environment remains minimal.	✓			
The RMP should contain any needed guidelines for addressing all types of	✓			

Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
energy production on public lands. Guidelines specific to the WFO public lands may be appropriate in addition to the existing Bureau of Land Management west-wide Energy Production EIS.				
In addition, the results of granting rights-of-way to such plants [GFP] will eliminate for the foreseeable future the development of renewable energies such as solar, wind and geothermal in an identified area of renewable resources.	✓			
Currently, one of our nation's most pressing concerns is to reduce our reliance on foreign energy. The vast energy and mineral resources under BLM's jurisdiction gives the agency a natural and key role in ensuring that our country has an adequate supply of energy necessary for the safety and security of our families, our communities, and our nation. These priorities can be met without diminishing the BLM's ability to manage other important interests.	✓	✓		
RDD, INC. would like to express a view in opposition of the proposed Granite Fox Power Plant in the Gerlach area. We have major concerns regarding the negative health and environmental impacts to the Knott Creek properties and surrounding areas as direct effects of the plant operations.	✓			✓
To ensure that the United States has adequate supplies of natural gas to meet demand and to moderate prices, it must pursue new gas supply options in a timely and environmentally responsible manner and diversify domestic sources of gas supply. BLM has an opportunity at this juncture to do just this. By balancing the varied uses in the planning region, it can increase natural gas supply and ease the nation's burden and natural gas demands.	✓			
We recognize that it is not easy to balance other competing interests with the public interest in obtaining a reliable, clean, domestic supply of energy. We believe that BLM can propose workable and well thought out alternatives in its Winnemucca DRMP/EIS, but must consider the policy initiatives discussed herein when finalizing its work product. AGA urges you to give appropriate weight to the broad environmental, economic, national security, and public health impacts when considering access to natural gas supply at a time when we need to increase supply to meet rising demand.	✓			
Nevada is a state well suited for development of renewable energy. We hope that the BLM will emphasize renewable energy over fossil fuel energy development. We support BLM's interest in developing renewable energy sources, such as wind, solar and geothermal energy development. The BLM is clearly considering wind energy around the state and industry interest appears to be increasing evidenced by the recent Draft Programmatic EIS on Wind Energy Development (Wind DEIS) issued last year. We also believe that it is important that project siting take into account the need to protect habitat and other special places. This RMP needs to take a very careful look at	✓			

Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>where development of these renewable resources is compatible with other mandates of the BLM.</p> <p>The Wind DEIS provides that BLM will not permit wind energy development where it is "incompatible with specific resource values." The Wind DEIS also recognizes that wind energy development and its associated infrastructure is incompatible with and should be excluded from the specially designated areas identified, including National Landscape Conservation System areas (National Monuments, National Conservation Areas, Wilderness Areas, and Wilderness Study Areas) and Areas of Critical Environmental Concern. This list should also include Native American sacred sites, citizen-proposed wilderness areas, areas designated or proposed for management to protect wilderness characteristics, areas of critical habitat, and habitats important for imperiled species.</p> <p>Decisions on wind energy or other energy development projects should be postponed until the RMP has been finalized and a thorough analysis completed of where it is appropriate for the development of these resources. The Winnemucca's existing manage plan is too outdated to allow for sound management decisions. Due to potential wildlife conflicts with some locations for wind energy we hope that the Nevada Department of Wildlife will be a key partner with the BLM in specific site location decisions.</p> <p>Additionally, we would like to see a more comprehensive statewide evaluation of the cumulative impacts associated with wind energy development particularly as it relates to wildlife management.</p>				
Please identify geothermal or wind areas that are potentially developable for energy similar to Rye Patch or San Emidio.	✓			
I support current management practices on minerals. I do not support a "no surface occupancy" on any geothermal lease.	✓			
Identify the criteria for siting utilities and facilities such as water availability, access and routes, new impacts, visual degradation, impairment of habitat for wildlife, wild horses, or humans and public health.	✓			
Focus on renewable energy. Leases should not be issued for fossil fuel projects.	✓			
I support development of renewable energy resources on public lands and I do not believe BLM should put "no surface occupancy" restrictions or restrictions on development, exploration, production or closures on renewable energy projects.	✓			
I support current management practices. I support current lands available for disposal, as long as they are not supportive of a fossil fuel project. I also support no limitation on wind energy development or other renewable energy projects. I support withdrawal of all fossil fuel projects in this planning area. Lands for disposal should be considered for renewable projects and not fossil fuel projects. I support exchanges, trading and purchasing of lands of high resource value especially if they support renewable energy or agricultural projects. I do not support future	✓			

Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
communication sites to be located at existing communication sites. I do not support eliminating all "planning corridors" in the previous MIPS. I do not support exchanges, trading or purchasing of lands for fossil fuel development.				
Large mineral, Oil and gas, geothermal and wind energy siting withdrawals must be made as part of this planning process. These activities should be precluded by withdrawals in all biologically sensitive, roadless or other important lands.	✓			
BLM's planning process must not authorize new utility corridors. These corridors open the way for a proliferation of energy developments, and have significant environmental impacts that are directly counter to the goal of restoration.	✓			
Please apply the previous discussion to the siting of all energy projects (wind, solar, etc.). No siting of energy facilities should be allowed in biologically or culturally important wild land areas. Large areas must be withdrawn from use as energy production sites as part of this RMP planning process.	✓			
In the new Resource Management Plan the focus must remain on the multiple use concept. In Nevada where 90% of the State is federally owned, ranches must be able to utilize public lands for grazing in order to sustain a profitable livestock business.	✓			
Look at Australia; you have dissimilar soils and yet the agricultural sustainability is about the same - Australia suffers from poor soils where as Nevada suffers from poor precipitation. But the results are the same: only so many folks can live here. So far Mother Nature has done a good job of limiting Nevada's population, and I would hate for that to change.	✓			
Population growth should also be projected in regard to the need for private lands to accommodate such growth. Public land surrounding communities in the Winnemucca District should be made available for disposal. Some communities do not have adequate private land surrounding communities to permit well managed growth opportunities.	✓			
The economic well-being of the communities involved is dependent to a high degree on the ability of various interests to use the resources on public land.	✓			
I would encourage you and the cooperators to identify economic development opportunities in terms of land tenure and permits/partnerships. Examples might include sand dunes OHV use, Winnemucca Mt., guiding and outfitting, ecotourism, facility development (wild horse viewing, trails, long term visitor areas, recreation sites, cultural interpretation, outdoor education (Water Canyon, Clear Creek, Knott Creek, sleeper pit, wilderness trips, etc.)	✓			
The BLM should develop this RMP in the context of the Mining and Minerals Policy Act of 1970's national policy to foster and encourage private enterprise in developing economically sound and stable domestic mining and minerals industries (30 USC 21a), as well as the Federal Land	✓			

Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Policy and Management Act's multiple-use mandate (43 USC 1732) and policy to recognize the Nation's need for domestic sources of minerals (43 USC 1701(a)(12).				
One should closely consider the influx of large, potentially remunerative (big agricultural projects; mines; Burning Man) in the context of the traditional values of the communities extant and proceed cautiously. With <i>Sempre</i> that should go without saying.	✓			
What is the total economic impact of Burning Man as an event held annually in the lands under your management? What is the source of, or method used to estimate, this data? What would be the impact to BLM and to the entire northwestern Nevada economy if Burning Man were to leave your district due to this plant?	✓			
Please add consideration of neighbors and compatibility with the neighbors, and indicate their interests are important in land use decisions.	✓			
Will the addition (during construction) of 700 to 1000 humans living and commuting in the district impact the traditional value of open access and open use of BLM lands? This is a very important ethic to all Nevadans, and restricted access would be a controversial and unpopular development. What type of use or abuse by these 1000 new, additional "locals" would trigger use restrictions? Surely you have explicit predictions of this. Please share them with all of us in the area.	✓			
We recognize that communities within this RMP may rely on the release of public lands for community development. Work with communities to identify what lands surrounding existing communities are needed and whether or not water, infrastructure and services are affordable and available. Land by itself is not enough. Encourage sustainable compact development in your RMP. Develop a framework for land consolidation in areas where it may be desired. Checkerboard lands are problematic, but may work around local communities.	✓			
Tourism and scenic values: Tourism in the West has always pitched Cowboys and Indians, wide open spaces and clean air. <ul style="list-style-type: none"> • Please develop criteria to protect these within your RMP. • Also please identify a few "tours" that people can safely make within the region. • Please identify facilities related to tourism, where they are and when they might be sited. • Please identify areas of interest that are cultural, historic or picturesque. • Please highlight the routes of the California Emigrant Trails outside the NCA. • Consider developing the framework for a tourism and recreation plan to follow the RMP. 				

Table D-5
Planning Classification for Comments Regarding
Mining and Other Commercial Uses *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<ul style="list-style-type: none"> • Fire also plays a role here. Fire affects visual qualities, wildlife, rangeland grazing and facilities. <p>Please address fire management and the impacts of fire on recreation and wildlife as it relates to scenic values and tourism opportunities.</p>				

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-6
Planning Classification for Comments Regarding Livestock Grazing**

Comment	Planning Classification ¹			
	A	B	C	D
Livestock grazing can be a great tool for the management of public lands when managed properly. Livestock producers must have adequate flexibility to best accommodate changing climates - the amount of moisture, and when the moisture comes, also varying temperatures. Please use not only the educational resources of agency personnel, but the vast knowledge of those who have lived in the area for many years. Livestock grazing can help address many other issues including fire, economic concerns, soil, water, air, vegetation and noxious weeds. Vegetation needs to be harvested to remain healthy. Soils need to be disturbed to remain productive. Water in most cases needs to be developed. You (agency) will be most effective when you let the rancher and his cows assist you.	✓			
Holders of federal grazing permits on federal land should be required to provide access corridors across private holdings to federal lands beyond, as a condition of the grazing permit.	✓	✓		
When addressing lifestyles, please set some criteria for preserving communities and lifestyles without boom/bust cycles (economic stability) or overwhelming local economies. All communities seem to want some growth, but they don't want to be overwhelmed with sudden changes, huge infrastructure and social service costs, and changes of political balances. Small communities want to preserve their neighborliness. Sudden changes disrupt the social and economic structures. Public land ranching is still a use and needs to be discussed in this RMP. BLM should stress the continuation of Grazing Standards and Guidelines.	✓			
I do not support implementing fee stations for day use areas or campgrounds. I do not support altering grazing allotments without the full and complete support of the permittee. I do not support setting aside allotted acreage as open or closed to mineral and energy development or harvesting forest products.	✓			
If you don't plan for all potential impacts to existing farming and ranching operations in this district, then your economic plans are invalid.	✓			
How long will it take for mercury to become an issue to ranchers in terms of the livestock which they grow, and try to sell, from BLM lands under this RMP? How will the federal government compensate these ranchers for the reduced value of their lease holdings?	✓			
BLM must detail its other costs in administration of these lands (recreational opportunities lost, weeds invading and treatments, increased fire suppression costs with livestock-caused weeds like cheatgrass) and present this to the public in its economic analysis. This is necessary to understand the administration of livestock grazing. Of particular concern is the lesser funding traditionally spent on wild lands restoration, habitat enhancement, and collection of baseline biological data.	✓			
Livestock grazing for fire management to control underbrush fuel for fire. Stop soil erosion from four-wheel drive access to grazing areas except for maintenance use.	✓			
The Association would like BLM to consider when preparing the Grazing Management portion of the plan, not issuing permits for the areas in and	✓			

Table D-6
Planning Classification for Comments Regarding Livestock Grazing *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>around the Association Properties. This winter and spring was a difficult time for property owners within the Association because of the cattle. The current permit holder crossed Association drainage ditches and privately owned parcels in order to get to a small portion of land to feed his cattle. I would like to make you aware there are no public easements in that particular area and our roads are privately owned and maintained. All winter the cattle grouped in the area of Phase D & E. There are no natural water supplies in that particular area and the current permit holder made an arrangement with a renter on the properties to place a trough for watering. This is not permitted within the Association and will be pursued further to assure it does not happen again. Feeding and watering close to or inside the Association's borders is simply wrong considering the bulk of the permit area is north of the Association. Ultimately the damage to the Association members' homes, roadways and detentions ponds caused by the cattle was great and unnecessary. The cattle were a nuisance and could have been avoided if the current permit holder would have fed his cattle north of sections 2-4.</p> <p>With the increased traffic, homes being built and Nevada Cements' proposed operations in our area, there is the potential for more damage and accidents should the cattle be permitted to roam.</p> <p>I am aware of the "fence out" portion of NRS however there is still accountability for the permit holder.</p>				
<p>I own a 50 acre parcel surrounded by Humboldt River Ranch property owners, which in turn is surrounded partially by BLM which has a grazing allotment. My concern is, the current permittee turns his cattle out in this area with total disregard for the property owners.</p> <p>My ranch is fenced, but during April and May of this year I was constantly repairing damage by the cattle trying to get to my water ponds.</p> <p>The permittee was not concerned that his cattle had no water in this area. I called several times, but to no avail. Even in open range, an owner should take responsibility to water his cattle. Thirsty cattle have no boundaries.</p> <p>Further more the permittee holder owns NO property in this area nor does he have any facilities in the area for loading or unloading his cattle. He is an absentee allotment owner. What little BLM grazing that there is in this area should be exempt. These cattle hang around Old Victory Hwy and Old U.S. 40 the entire winter, which causes a very dangerous situation, the owner has made no attempt to move the cattle to the BLM areas.</p>	✓			
<p>In the new Resource Management Plan the focus must remain on the multiple use concept. In Nevada where 90% of the State is federally owned, ranches must be able to utilize public lands for grazing in order to sustain a profitable livestock business.</p>	✓			
<p>Ranching is important to open spaces. Ranchers maintain and develop water that benefits wildlife. Grazing is a useful tool for reducing fuels that lead to devastating wildfires.</p>	✓			
<p>All Herd Management Areas and Allotments need to be assessed on their</p>	✓			

Table D-6
Planning Classification for Comments Regarding Livestock Grazing *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
ability to provide water, feed, and cover for domestic livestock, wild horses, wild burros, and other wildlife.				
During the past twenty one years of land use plan implementation, the Bureau of Land Management revised its regulatory authorities under the Range Reform Regulations. To this end, the Resource Advisory Council developed Rangeland Standards and Guidelines to implement through the Winnemucca Field Office. Multiple Use Decisions established allotment specific objectives that served as Guidelines and/or terms and conditions for livestock permits. We would appreciate the correlations of these Guidelines, objectives, terms, conditions or allowable use levels in the new land use plan.	✓			
Emphasis on fire and rehabilitation/management with allowance for grazing as a tool in fire prevention.	✓			
A cow or sheep is the only management tool you have to control crop residue, because they can be put in and removed out of an area when needed. Wild horses can't do that.	✓			
Building in the importance of grazing in the multiple use mix as a lawful activity which contributes economically and socially.	✓			
Here are some questions that need to be answered before we can accept long-range plans for this area: What data does BLM use to ensure that reported livestock numbers (in accordance with issued permits) are correct? Are grazing permits adjusted to reflect annual changes in range conditions? Are provisions in place to remove domestic livestock from over-grazed areas, or are wild horses the main species that is removed? When an area is found to be deteriorating, what methods are used to determine the causes? When wild horses and burros are removed in response to rangeland deterioration, are follow-up studies performed to see if this made any difference? If their removal has brought no measurable improvement, are wild horses and burros either replaced or allowed to replace themselves?	✓			
While recognizing, protecting, and enhancing special status species habitats and other values, BLM must also grapple with ongoing livestock grazing degradation of riparian areas and uplands in portions of these allotments; invasive species (primarily caused or extended by livestock disturbance, facilities and/or roading); fragmentation caused by grazing installations/livestock facilities, fire and other factors; OHV use exacerbated by livestock facility-associated roading; and other impacts of livestock grazing that are increasingly fragmenting sagebrush habitats.	✓			
I would urge the agency to work in cooperation with and include all the livestock permittees involved, in developing this Resource Management Plan. Hopefully by working together in its development, it will lead to a greater acceptance of the plan in the end.	✓			
Provision for exchange/disposal of land and ways to make permittees whole if grazing area is removed from allotments.	✓			
Provision for agency/permittee vehicular access to manage grazing and install and maintain range improvements.	✓			
Public information activities that clearly recognize grazing as a legitimate	✓			

Table D-6
Planning Classification for Comments Regarding Livestock Grazing *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
activity in multiple use and that encourage other interests to have respect for the animals using the rangelands and their associated facilities.				
There is enough defacto wilderness now. The Plan should implement fuel reduction grazing, i.e., March April in areas of cheatgrass, not take non-use for 2-3 yrs. While the cheatgrass comes back and continues to build up. Then it can make another run, "the fire" into the sagebrush that was left before.	✓			
I support current livestock grazing guidelines.	✓		✓	
BLM is required under the Taylor Grazing Act to set forth its criteria and assessments for grazing suitability determinations. The TGA was passed to "stop injury to the public lands by preventing overgrazing and soil deterioration", and to determine that land is "chiefly valuable" for grazing.	✓			
Provision for a "Stewardship" program that would allow grazing permittees greater flexibility in management of livestock use and application of range improvements while cooperating and communicating with BLM (the 4 Cs).	✓			
BLM must provide a two-part grazing suitability analysis that: 1) Catalogues and describes lands unsuitable for grazing due to lack of herbaceous vegetation "production"; distance from natural water sources; slope, rockiness (much of these allotments); existing environmental damage (downcut gullies, wet meadows with shrinking wetted areas due to livestock damage, lands "at risk" to weed invasion); lands so seriously depleted that they are no longer able to support livestock grazing on a sustainable basis; and lands that are "at risk" of crossing thresholds (due to livestock degradation) from which recovery to native vegetation communities will not be possible due to dominance of exotic species. 2) Catalogues and describes lands unsuitable for grazing based on their important values to rare and declining species, recreational uses, cultural sites, aesthetic value, and other legitimate uses and values of public lands that are harmed or degraded by the chronic effects of livestock grazing.	✓			
Will ranchers be permitted to dig ever deeper wells to obtain the same amount of water that they have rights to now? Has BLM conducted an analysis of the well-drilling permit process to ensure rancher access under various models of water impact, including water mining, for the entire basin?	✓			
The Paradise-Denio and Sonoma-Gerlach Grazing Environmental Impact Statements determined the land's suitability for livestock grazing and wild horses in 1981. Studies that determined the amount of available water forage and cover necessary to support these uses set an initial stocking rate for monitoring purposes. During the past 12 years, the duty of the Bureau was to make necessary adjustments in livestock practices and wild horse numbers to achieve the broad objectives of the plan. The purpose of a new land use plan is to implement necessary measures to fulfill these resource mandates with the use of additional data to achieve the proper carrying capacity or thriving natural ecological balance of our public lands.	✓			

Table D-6
Planning Classification for Comments Regarding Livestock Grazing *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Livestock Grazing Causes A Broad Array of Harmful and Ecologically Calamitous Impacts Often Downplayed by Agencies There has long been a tendency by agencies to mask or ignore the severity of the impacts of livestock grazing to native wildlife habitats.	✓			
Livestock grazing causes behavioral disturbance of wildlife, removes protective cover	✓			
Livestock trampling compacts soil and alters soil structure at burrow sites	✓			
Livestock trampling collapses burrows and may injure or kill pygmy rabbits	✓			
Livestock grazing and trampling causes widespread erosion of soils and loss of microbiotic crusts leading to weed invasion	✓			
Livestock grazing destroys composition of big sagebrush communities	✓			
Livestock grazing radically alters shrub structure	✓			
Livestock fences degrade and fragment upland habitats and aid predators	✓			
Livestock water developments degrade and destroy habitats	✓			
Water hauling for livestock demolishes habitats	✓			
Livestock wells and pipelines destroy habitats	✓			
Riparian fencing shifts intensive livestock use to unresilient uplands	✓			
Placement of livestock salt and mineral supplements in upland sites destroys habitats	✓			
Holistic grazing and herding destroy big sagebrush habitats	✓			
Rest rotation grazing schemes flood wildlife habitats with cattle	✓			
Drought exacerbates livestock grazing impacts and competition	✓			
Public land ranching is still a use and needs to be discussed in this RMP. BLM should stress the continuation of Grazing Standards and Guidelines.	✓			
Livestock grazing is the primary (and often the only) cause of water quality degradation in the EIS area. Livestock grazing causes watershed destruction ranging from desiccation of headwater springs and seeps to downcutting and gullyng of streams resulting in rapid runoff and limited water storage.	✓			
BLM must collect baseline water quality data on springs, seeps, streams and other riparian areas during periods of the year when livestock are present, and/or runoff is occurring, as part of this process. This is necessary to allow up-to-date and informed decision-making on compliance with state water quality standards and the CWA, and much-needed additions to the 303d list.	✓			
A minimum period of five years rest from livestock grazing following any wild fire must be standard operating procedure on EIS lands. This is necessary to allow recovery and establishment of native species. Grazing should then be allowed only if specific measurable criteria for establishment of native vegetation and microbiotic crusts have been met.	✓			
BLM should not construct new or temporary fences in burned lands. The already existing pasture fences should be used to control livestock. Electric fences very often fail, and burn trespass occurs. Any livestock trespass of burns or areas being rested from grazing must result in permit action against the responsible permittee. The public's investment in fire rehab is often tens of thousands of dollars, and it can be	✓			

Table D-6
Planning Classification for Comments Regarding Livestock Grazing *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
destroyed through trespass.				
Livestock grazing during all periods of the year damage soils and microbiotic crusts, and increase soil vulnerability to wind and water erosion. Trampling damage to soils affects everything from burrows of native animals, to larvae of native pollinators to roots and mycorrhizae of native tree shrubs and trees.	✓			
Livestock cause erosion and damage or loss to artifacts and sites - particularly in the vicinity of springs, seeps and other riparian areas. Livestock facility construction causes shifts in livestock use that may lead to new or extended damage to sites - spanning the range from disturbance of rimrock stone blinds, to trampling and breakage of artifacts. Invariably, BLM's cultural specialists are forced to allow range developments to proceed, despite shifted use to new areas that may also have cultural importance.	✓			
Federal legislation implementing a buyout of grazing permits and the permanent removal of livestock grazing from the affected lands is a very reasonably foreseeable development in public lands management in the EIS area within the next few years.	✓			
Any economic analysis involving these lands must clearly identify that changes in livestock numbers in most lands here will not be affecting small ranchers. Instead, they mostly involve a huge corporate entities or land speculators that may in reality return a minuscule amount to the local economy. The quite minor economic importance of public lands ranching in the Planning area must also be studied here. BLM must detail its annual cost of administration of livestock grazing on affected lands under the current and alternative systems. BLM must provide the percentage of these administrative costs that are covered by BLM's income from the approx. very meager grazing fee, and present this to the public in its economic analysis.	✓			
During the past twenty one years of land use plan implementation, the Bureau of Land Management revised its regulatory authorities under the Range Reform Regulations. To this end, the Resource Advisory Council developed Rangeland Standards and Guidelines to implement through the Winnemucca Field Office. Multiple Use Decisions established allotment specific objectives that served as Guidelines and/or terms and conditions for livestock permits. We would appreciate the correlations of these Guidelines, objectives, terms, conditions or allowable use levels in the new land use plan.	✓			
BLM should not allow Temporary Non-Renewable Use (TNR) on these lands through this EIS process. TNR use is not compatible with restoration of damaged plant communities, protection of special status species habitats, or maintenance of wildlife populations. TNR has typically occurred in the winter - when there are significant conflicts between wintering wildlife and human intrusion on special status species, raptor, big game and other winter habitats. Plus, in many areas where TNR has been issued, smaller native bunchgrasses may be growing, microbiotic crusts extensively	✓			

Table D-6
Planning Classification for Comments Regarding Livestock Grazing *(continued)*

Comment	Planning Classification¹			
	A	B	C	D
trampled under muddy conditions, and sagebrush consumed as winter browse.				

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-7
Planning Classification for Comments Regarding Special Designations**

Comment	Planning Classification ¹			
	A	B	C	D
We do not believe that there is any need in Northern Nevada for more wilderness areas. Those areas would include Washoe, Humboldt and Pershing counties. The wilderness areas only succeed in taking the land away from the public including the hunters, miners, 4 wheel enthusiasts, senior citizens and children. If you cannot drive on the roads the seniors and/or the kids will not be able to enjoy any of it.	✓			
<p>For the record, we must take issue with the information you provided at your scoping meetings. Specifically, the handout titled Winnemucca Field Office Analysis of Management Situation Summary #15 Special Designations and Wilderness Character.</p> <p>In that document you erroneously state that only Congress can designate WSAs. Clearly that is not the case and BLM has been designating WSAs as part of planning efforts well outside of the original inventory directed by FLPMA.</p> <p>We are aware of the April 2003 settlement agreement (Utah Settlement) between Secretary Norton and the State of Utah, as a result of which BLM abdicated its authority to designate any additional WSAs and subsequently rescinded Handbook H-1630-1. However, we maintain that this agreement is invalid and will ultimately be overturned in pending litigation. Friends of Nevada Wilderness is a part of that litigation and we would be remiss to our members who use public lands managed by the Winnemucca Field Office if we did not bring this to your attention again, during this scoping period.</p> <p>The Nevada Wilderness Coalition, which includes both of our organizations, has reviewed lands within the Winnemucca Field Office and found lands that we believe fully met the criteria and the standards set out in BLM's Handbooks for identification and management of WSAs. Therefore, we contend that BLM can and should continue to designate the areas identified by citizens and by agency personal that have wilderness character.</p> <p>We do applaud your office for specifically listing the following areas as those identified by citizens as having wilderness character.</p> <ul style="list-style-type: none"> • Lave Beds/Dry Mountain • Bluewing Mountains • North Sahwave Mountains • Fencemaker • Portions of the Tobin Range between China Mountain WSA and the Tobin WSA. <p>In our opinion, these lands meet the criteria for designation under the Wilderness Inventory and Study Procedures Handbook (H-1630-1). Consequently, we propose that these lands be designated as WSAs and be managed to prevent impairment of their wilderness character in accordance with the Interim Management Policy (IMP) For Lands Under Wilderness Review (BLM Handbook H-8550-1).</p>	✓	✓		✓

Table D-7
Planning Classification for Comments Regarding Special Designations *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Limiting proposed Wilderness to no more than that recommended earlier by BLM. Other special designations should be proposed only where there is a demonstrated need that all interests can agree on. The recently created Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area with its areas of critical environmental concern and associated wilderness are quite enough for one field office.	✓			
I am particularly concerned about preserving and protecting the National Historic California Trail through the RMP area. This also includes the visual integrity of the California Trail.	✓			
<p>While we have been pleased with the designated wilderness management efforts in the Winnemucca Field Office we have been very discouraged with management (or lack of management of the Wilderness Study Areas (WSAs) within the field office. We would like to see a commitment to better manage these important areas in the RMP itself. Here are some specific suggestions:</p> <ol style="list-style-type: none"> 1) All of the WSAs should be designated as limited to designated routes. The routes designated should be only those in existence and in use in 1979 when these areas were designated as WSAs. BLM has a mandate from Congress to protect the wilderness values of these WSAs until such time that Congress makes a wilderness designation decision. In our opinion, the Winnemucca Office personnel have NOT been doing that and the wilderness values of these WSAs are being compromised. 2) As a part of the RMP process, the Winnemucca Field Office must do a comprehensive inventory of all the routes in the WSAs. Using the original inventory maps and aerial photos from 1979, the BLM must clearly identify those routes in existence at the time the area was made a WSA in 1979. ALL other routes must be rehabilitated immediately to restore the WSA's damaged wilderness character. This creep of new roads pioneered illegally into these WSAs must stop and the damage be rehabilitated at once. Friends of Nevada Wilderness will be happy to help with the restoration as we have in the designated wilderness areas. <p>There may be cases where routes that were in existence in 1979 should be closed because of damage to natural or cultural resource values. Every route in each of the WSAs should be assessed very closely. We will be happy to assist with that effort as well.</p> <p>There may also be routes which have naturally been reclaimed because they have not been used. These routes should be designated as closed and natural rehabilitation should be encouraged.</p> <p>Having a designation that limits vehicle use to existing routes in wilderness study areas is crazy since the "existing" keeps expanding and expanding over the years. It also "rewards" illegal use and encourages the proliferation of new vehicle routes. This is a problem all over the lands managed by the Winnemucca Field Office but it is a travesty within wilderness study areas.</p>	✓			

Table D-7
Planning Classification for Comments Regarding Special Designations *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
The public land management by the WFO within this RMP includes a significant area that is a "checkerboard" configuration with public and private ownership. Nothing in the literature or from the discussions at the workshop appears to address this significant interface. Many of the Preliminary Planning Issues cannot be managed within this framework without a comprehensive integrated plan. "Participation" by Nevada State/County personnel in the planning process will not provide for an enforceable commitment for the issues. One simple example: Wilderness, wilderness study area and other special designations criteria are virtually meaningless within the checkerboard area, if they cannot be uniformly applied to and enforced on both the public and private land areas.	✓			
3) Once the legal routes have been identified and decisions made on which additional routes should be closed, the resulting legal vehicle routes in the WSAs should be clearly delineated and be made available to the public on handouts and recreation maps. WSA boundaries need to be signed and it needs to be very clear to the public what is OK to drive on and what is closed within these WSAs.	✓			
At this point in the wilderness areas that have already been designated, the BLM has little control over the weeds, not much better control for fire, and very little concern for those people who live and work in this area. Making more wilderness areas appears to be a means for BLM to justify their own existence and not for the good of the land, the animals, or the population.	✓			
5) The wilderness study area lands within the Winnemucca Field Office have well known and well documented wilderness values. Since this RMP will be the guiding management document for many years, we would like to see specific language on what the management goals will be for these areas should some WSAs or parts of WSAs not be designated as wilderness by Congress. Wilderness values are a very finite resource and we strongly suggest that the RMP be very clear on how these values will be protected administratively in the long term. We suggest the following language so there is no question. Any WSA acreage not designated as wilderness by Congress should be managed with the following management prescriptions: ROS - Primitive category -to retain the previously identified wild character of the land. <ul style="list-style-type: none"> • VRM-Class 1 - to retain the previously identified visual wild character of the land. • Remain closed to off road vehicle use except for designated routes. • Remain closed to leasable mineral entry • Identified as closed for mineral entry for locatable minerals • Remain closed to saleable mineral entry. • Remain in a Zone 1 land tenure category - to be permanently retained in public ownership 	✓			
Jack Walters, one of Nevada's pre-eminent bird watchers, first brought to	✓			

Table D-7
Planning Classification for Comments Regarding Special Designations *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>the birding world attention, the existing of Porter Springs located near Lovelock. Because the springs provide one of the few resting and feeding sites for many migrant birds, Porter Springs soon became a regular visiting site for birders. The list of species located at the site is extensive. BLM owns the land around the spring. Ideally, an agreement with the water right owner will result in the type of management, which continues to recognize the importance of the trees, water, and understory for migrating birds. We are asking that Porter Springs be considered for special management such as an ACEC, which can result in protective measures such as fencing to keep the burros out.</p>				
<p>Designation of ACECs of sufficient size to truly protect functioning ecosystems is very important to protect special values of these landscapes. It is imperative that BLM in this planning process acts to protect these irreplaceable values and attributes. Recreational uses of public lands are burgeoning as populations in the Intermountain West grow.</p>	✓			
<p>We are proposing that the BLM designate a special management area for the Granite Range. This unique range is crucial for many wildlife species. This range is the oasis in the center of the vastness of the Smoke Creek and Black Rock Deserts. It contains numerous springs and seeps that are the life blood for herds of pronghorn, mule deer and bighorn sheep. Recognizing the special wildlife values of this range and protecting the unfragmented habitat for these species is important. In addition to the importance to the wildlife, this range was important for historic and prehistoric peoples in the region. The range is highly scenic and offers unbeatable views of the surrounding deserts. The Granite Range is the viewshed for the historic Nobels Trail as well as the Lassen-Applegate Trail.</p> <p>Clearly, this area needs special management. We suggest the following management prescriptions:</p> <ul style="list-style-type: none"> • ROS - Semi-primitive non-motorized category -to continue to provide quality wildlife habitat protection and quality hunting experiences. • VRM-Class I - to retain the important historical viewshed that is so critical to the historic trails that run near the Granite Range. • Designate this area as "limited" to designated roads and trails. The baseline should be what routes are currently there. Evaluate all existing roads and trails for their impact on wildlife. Close those routes that would negatively impact wildlife resources in the areas. A special emphasis should be given to ensure roads do not penetrate to wildlife water sources. • Designate the range as closed to leasable mineral entry • Designate the range as closed for mineral entry for locatable minerals • Designate the range closed to saleable mineral entry. • All lands in the Granite Range should be designated as Zone I and be 	✓			✓

Table D-7
Planning Classification for Comments Regarding Special Designations *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
permanently retained in public ownership.				
Be sure to update your plans for WSAs if they are not designated, this might also help in the county land bill process so people would know exactly how the area would be managed.	✓			
Any other BLM lands which surround water sources should receive special recognition and management.	✓			
We would encourage the BLM to closely review the North Fork of the Little Humboldt River for eligibility and suitability for inclusion into the National Wild and Scenic River system. This river would qualify because it contains the outstandingly remarkable value of populations of Lahontan Cutthroat Trout.	✓			
We already have Wilderness Areas, so the people who want solitude should be forced to "use these areas" and not use the shotgun approach in Land Management Decisions that facilitate their philosophy to the rest of our public lands.	✓			
<p>We ask that the BLM consider establishing a special recreation management area (SRMA) for the Lava Beds Complex. This highly scenic area is popular for a variety of recreation uses and is deserving of special management attention. We would be happy to work with BLM staff on specific boundaries.</p> <p>The proposed Lava Beds SRMA Complex is characterized by incredible granite geology speckled with lush springs. The area north and west of this consists of slowly undulating valleys, marked with numerous washes that lead up to gently sloped peaks of over 6,000 feet. Mule deer, bobcats, wild horses, burros and chukar can be found there, along with resident pronghorn which utilize the valley bottoms. Numerous bird species can also be found including the golden eagle, spotted towhee, Say's phoebe and loggerhead shrike.</p> <p>The area supports at least one sensitive Nevada endemic forb species, the winged milkvetch (<i>Astragalus pterocarpus</i>). The proposed Lava Beda SRMA complex also includes portions of two Nature Conservancy portfolio sites, Kurniva Valley (A146) and Lava Beds Creek (A148), selected as such on the basis of their sagebrush semi-desert ecosystem conservation values.</p> <p>There is a good road network to provide adequate access and opportunities for driving for pleasure yet at the same time provide outstanding semi-primitive non-motorized recreation opportunities. Those seeking solitude in the Lava Beds complex would have no difficulty losing themselves in the myriad rocky outcroppings and strange spires. Hunting and hiking are the major recreational activities enjoyed in the area, and its unique geology and stunning vistas attract weekend visitors from the Reno area. Photography is another pursuit in and among the undulating outcrops, and the setting sun creates an amazing play of shadow and light among some of nature's most spectacular architecture.</p>	✓			
I do not support additional management practices that would restrict	✓			

Table D-7
Planning Classification for Comments Regarding Special Designations *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
motorized access or any other access to current WSA or areas that a few people believe have wilderness character. The Wilderness areas that were designated in the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area legislation receive very few visitors throughout the year. It is not multiple use if BLM continues to restrict or special designates additional lands that they already manage for the public. I do not support any new restrictions or special designations. Due to funding, the BLM can not adequately manage existing designations, adding more special designations would not be smart.				
We would like to see a strategy developed in the RMP to address the management challenges of the checkerboard land along the railroad within the Winnemucca Field Office boundaries. We believe there are public lands in the checkerboard area that would be better suited in private ownership and available to the local communities for economic development. It is important however, that existing public access in the checkerboard region be maintained or acquired as needed through easements with private landowners. While we strongly support privatizing lands adjacent to communities for needed community services and development, we are opposed to lands leaving public ownership for non-public reasons. We support lands being made available to the counties for parks or open spaces.	✓			
More attention needs to be paid to ORV incursion in wilderness and wilderness study areas; as a forest aid I think several areas need protection - the lava beds among them - and the Smoke Creek Desert in its entirety should be recommended for wilderness study. At the very least it must be taken off the disposable list.	✓			
Please address the impacts of water withdrawals, cherrystem roads and air quality within Wilderness and WSA's.	✓			
One expects solitude and clean air and water within Wilderness and WSA's. With that in mind, please set limits to change, particularly to air quality in wilderness areas.	✓			
We believe it is necessary for BLM to establish several large ACECs to protect the significant special status species, conservation, watershed and wild land values. Of a size that will protect landscapes or ecosystem level processes. In addition, BLM should designate RNAs, embedded within a larger matrix of an ACEC of sufficient size to protect important ecological values. Large ACECs and seasonal avoidance criteria should be part of the EIS process.	✓			
All WSAs, recommended Wild and Scenic Rivers, significant unroaded lands suitable for wilderness, all ACECs, etc. should be protected from new or increased livestock intrusion in all parts.	✓			
BLM must use this planning process to expand its understanding of unroaded lands beyond that of the out-dated, deeply flawed and politically biased wilderness inventory process of over 20 years ago.	✓			
BLM must designate manage large areas of roadless lands greater than 5000 acres in size, and all portions of ACECS as VRM I. This is fully compatible	✓			

Table D-7
Planning Classification for Comments Regarding Special Designations *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
with special status species habitat management - for example, VRM 1 or 2 classification would result in removal or no new construction of elevated sage grouse predator-perches in wide-open sagebrush landscapes.				
Wilderness values are closely linked in our desert area with water resources. There should be no decisions made by the BLM that would adversely affect the quality, quantity or sustainability of our wilderness water resources.	✓			

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-8
Planning Classification for Comments Regarding Wild Horses and Burros**

Comment	Planning Classification ¹			
	A	B	C	D
<p>Field Office inventories and assessments are necessary to justify current AML's and to adjust them to current conditions. Range conditions need current assessments. For example, the number of proper functioning riparian areas should be compared to those that are functioning at risk or non-functioning.</p> <p>How many of the Herd Management Areas have appropriate management levels determined through Multiple Use Decisions? How many Herd Management Areas are currently at appropriate management levels? If not, do range conditions and the condition of the horses themselves indicate that the stated AML number may be too high or too low?</p> <p>Appropriate Management Levels should be determined using current data regarding riparian habitat, herd viability, herd longevity, and genetic composition.</p>	✓			
<p>Leave the wild horses and burros as they are - stop the roundups and slaughter.</p>	✓			
<p>All Herd Management Areas and Allotments need to be assessed on their ability to provide water, feed, and cover for domestic livestock, wild horses, wild burros, and other wildlife.</p> <p>Appropriate Management Levels of wild horses must be determined with data and computations that are solely founded on wild horse impacts to rangeland. Carrying capacity estimates must separate wild horse usage of key vegetation and riparian areas from that of domestic livestock. For the purpose of assigning AUM's, horse and livestock numbers should be counted in the same way, i.e. cow-calf pairs counted in the same way as mare-foal pairs (either as two individuals or as one, but the same for both species).</p> <p>Wild Horse Management Areas need to be assessed in respect to manageability. Those HMA's with significant portions in private ownership (checkerboard) or within (potential) Tribal lands need to be assessed in respect to the Bureau's ability to manage a viable herd.</p>	✓			
<p>I would like to affirm that there are both wild horses and burros that are not part of the HMA for the Knott Creek allotment and removal is requested. Specifically, the wild horses occupy the Idaho Canyon pasture of the Knott Creek allotment and the burros occupy the Knott Creek North pastures of the Knott Creek allotment.</p>	✓			
<p>Here are some questions that need to be answered before we can accept long-range plans for this area: What data does BLM use to ensure that reported livestock numbers (in accordance with issued permits) are correct? Are grazing permits adjusted to reflect annual changes in range conditions? Are provisions in place to remove domestic livestock from over-grazed areas, or are wild horses the main species that is removed? When an area is found to be deteriorating, what methods are used to determine the causes? When wild horses and burros are removed in response to rangeland deterioration, are follow-up studies performed to see if this made any difference? If their removal has brought no measurable improvement, are wild horses and burros either replaced or allowed to replace themselves?</p>	✓			

Table D-8
Planning Classification for Comments Regarding Wild Horses and Burros *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
We are asking that Porter Springs be considered for special management such as an ACEC, which can result in protective measures such as fencing to keep the burros out.	✓			
Are the water sources on each HMA private or public? If private, what agreements exist between the owner and BLM in regard to wild horse usage? This would be an issue when determining suitability and longevity of HMA's.	✓			
<p>While we support the concept of humanely lowering fertility of certain wild horse herds, in order to reduce the size and frequency of gathers, we do have concerns about this. Experiments in fertility control have been commonplace in Nevada wild horse herds for at least the last 10 years, but there does not appear to be much follow up data collection, or at least, none that is very visible.</p> <p>All data should be assessed to determine the validity of fertility control programs on wild horse populations. What is the impact of the fertility drugs on the health and well-being - both short-term and in the long run - of the mares involved? Are behavioral or physical changes observed that could indicate that the mares are being adversely affected by the presence of these drugs in their systems? If pregnant at the time of inoculation, do the mares abort the foal they are carrying? If not, are the foals born with defects or an increased susceptibility to cancers (as are humans born under similar conditions)? Do the foals mature normally and live normal lifespans? Would vasectomy to males in a capture, snip, and release offer an effective alternative? An Environmental Impact Statement needs to provide rationale for implementing these actions.</p>	✓			
<p>Adoption Policies have altered the age, color and sex components of wild horse herds over the years. All data collected over the term of this land use plan should be mandated and assessed to determine proper herd viability.</p> <p>Wild horse management includes not just what happens on the range, and the gathering of excess animals, but also what happens to the animals once gathered. Conditions at the holding facilities, their budgets and available workforce to handle an influx of newly gathered animals, and the prospects for the newly gathered animals' successful adoption should be part of the planning process.</p> <p>Field Offices need to work in close communication with the holding facilities and the State and National BLM offices, in order to integrate all aspects of the wild horse program, and to be sure that horses and burros, once gathered, can be cared for properly and in a timely manner.</p> <p>Gathers that are not of an emergency nature should be scaled to the abilities of the holding and processing facilities to provide for incoming animals. The holding facilities need to have the workforce - volunteer or paid staff - in place to properly meet the survival needs of young foals and other stressed and compromised newly gathered animals in a timely manner.</p> <p>If the budget for proper care of new arrivals, and effective efforts to get</p>	✓			

Table D-8
Planning Classification for Comments Regarding Wild Horses and Burros *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>them adopted within a reasonable time frame are not in place, then the gather should be postponed.</p> <p>When animals are being gathered at a faster rate than the holding facilities can take care of them, the animals are placed at great risk of disease and death from disease, and they also miss adoption opportunities, since they cannot be adopted until they have their necktags, freezebrands, and vaccinations.</p>				
<p>The RMP should consider the wild horse herd management areas as complexes that reflect actual horse migratory patterns, rather than as human-defined individual areas. There are many HMAs whose herds intermingle with neighboring HMAs. When these conditions of natural herd behavior and relationship exist, it is appropriate to manage them as Herd Complexes, rather than individual HMAs. We are pleased to see that these Field Offices are doing this with the Buckhorn and Coppersmith HMAs. We support this and hope that it continues in the new RMP.</p> <p>Conversely, when an HMA is isolated whether geographically or artificially (such as with a fence), it should be managed as a discreet unit and not artificially merged with another for management and gather decisions. (This would require maintaining a population that is genetically viable)</p> <p>The Appropriate Management Level for each and every HMA needs to be a number that can support a genetically healthy population in the long term. 100 animals is normally considered the requirement for sufficient genetic variability to preserve herd health. 50 breeding adults is considered the absolute minimum. This RMP must include criteria for future management to insure herd viability.</p> <p>Current census data should be used to compare the current herd structure and compositions (as to age range, gender ratio, birth and death rates, etc.) with what would be considered the natural (untampered by humans) composition. Management goal should be to restore each herd to a natural herd composition.</p> <p>What is the actual observed annual rate of population increase for each HMA? (based on gather data and census data) Changes in weather, livestock grazing, disease outbreak, increase or decrease in predators, and other conditions can cause significant variances from the 15% - 17% recruitment used in the computer models. The use of computer modeling programs - while sophisticated and useful up to a point, should not replace actual in-the-field census-taking and monitoring.</p> <p>This RMP needs to establish Standard Operating Procedure (SOP) for determining the carrying capacity of any given range, and of allocating forage to wild horses.</p>	✓			
<p>I support lowering and adjusting AMLs in order to maintain the integrity of the soil, water and vegetation for wild animals and livestock.</p>	✓			
<p>Criteria and direction for emergency gathers should be established in the LUP as guidance for future management in the District. It has been established that the Bureau could identify a potential emergency and react</p>	✓			

Table D-8
Planning Classification for Comments Regarding Wild Horses and Burros *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>appropriately before the situation becomes dire (animals actually dying). Emergency gathers require environmental assessments with decisions backed by a land use plan. The Plan should address the criteria needed to declare an emergency and all other meaningful actions necessary to provide emergency relief to range lands.</p> <p>When animals are completely removed from an HMA after fires and other emergencies, they should be returned to the HMA in the same composition as they were removed. Criteria should be developed to establish guidelines to these emergencies.</p>				
<p>We would strongly urge having each herd area analyzed genetically, by either Dr. Gus Cothran at the University of Kentucky, or a person of similar expertise at local California or Nevada facilities. Establishing a genetic profile for each herd area is useful in many ways, and critical in others:</p> <ol style="list-style-type: none"> 1. It provides a base, from which to monitor changes in genetic variability and herd composition 2. It provides security that we are not inadvertently wiping out possible historical treasures, such as bands or herd with strong genetic links to ancient Spanish lineage, or Native American breeds 3. If and when such herds or bands are found, they can be protected, promoted, etc., in ways that benefit both the BLM WHB program, and the herds themselves (examples: The Sulphur Springs, Pryor Mountain and Kiger herds) 4. Genetic profiles, combined with historical records, give each herd a unique profile that can be used very effectively to promote adoptions. Whatever the background of a herd - whether Ancient Spanish, draft horse, US Cavalry Remount program, Pony Express Trail, Native American breeding, quarter horse ranching, or anything else - each herd has its own unique appeal that can be maximized to promote successful adoptions. This has been done in Oregon and seems to be quite successful. <p><u>Genetics, part 2</u> Whether we like it or not, the fact is that BLM IS in the horse breeding business. Whenever herds are gathered and decisions made as to which animals are removed and which remain to produce the next generation, we are involved in selective breeding. Currently we are seeing herds that have not been within stated AML's for 20+ years, suddenly being gathered to 40% below AML. The reality of this process is that as much as 75 - 85% of the current herd is being removed in some cases. This kind of mass reduction makes the need for careful and intelligent genetic monitoring even more acute. It also mandates that we know very much what we are doing, what we are dealing with in terms of herd qualities, and what we want the horses of the future to look like. We need to make sure that we are not permanently wiping out something that might have been a historical treasure. We need to make certain that we retain on the range breeding stock that is physically,</p>	✓			✓

Table D-8
Planning Classification for Comments Regarding Wild Horses and Burros *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
genetically, and aesthetically sound. <u>Genetics, part 3</u> Some HMAs within this district have already been reduced below the threshold of long term genetic viability. Since this is an apparent violation of BLM's mandate to maintain viable herds, what plans are in place to mitigate this? If the solution is to import "outside blood" - what provisions are in place to preserve the unique qualities and herd character of the affected herds? Again, genetic analysis can help choose appropriate individuals for the purpose of maintaining viable populations who do not lose their unique herd characteristics.				
The Paradise-Denio and Sonoma-Gerlach Grazing Environmental Impact Statements determined the land's suitability for livestock grazing and wild horses in 1981. Studies that determined the amount of available water forage and cover necessary to support these uses set an initial stocking rate for monitoring purposes. During the past 12 years, the duty of the Bureau was to make necessary adjustments in livestock practices and wild horse numbers to achieve the broad objectives of the plan. The purpose of a new land use plan is to implement necessary measures to fulfill these resource mandates with the use of additional data to achieve the proper carrying capacity or thriving natural ecological balance of our public lands.	✓			
Identify the criteria for siting utilities and facilities such as water availability, access and routes, new impacts, visual degradation, impairment of habitat for wildlife, wild horses, or humans and public health.	✓			
While we are not wild horse advocates, and understand the ecological harms that wild horses cause to native vegetation communities, we have repeatedly witnessed Nevada BLM cutting horse numbers while at the same time keeping livestock numbers the same - or even allowing increases. BLM must conduct monitoring that carefully differentiates between the impacts of livestock and horse use. BLM must re-examine all recent decisions where horses have been cut, but domestic livestock numbers remained the same.	✓			

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-9
Planning Classification for Comments Regarding Cultural Resources and Traditional Values**

Comment	Planning Classification ¹			
	A	B	C	D
By the map on your March 2005 newsletter, it appears that the Lassen Trail is included in the Black Rock Conservation Area - if so, is Antelope Springs accessible by vehicle? I have an ancestor buried there and visit the gravesite occasionally. I also would like to return to Rabbit Hole Springs to do historical research. I would hope that there are, at least, cherry stem roads and parking areas for those unable to walk great distance.				✓
I am particularly concerned about preserving and protecting the National Historic California Trail through the RMP area. This also includes the visual integrity of the California Trail.	✓			
Historical etc. values must continue to be inventoried, protected and studied.	✓			
I respect regulating for cultural, T&E habitat.	✓			
Attention should also be paid to the "lava beds" Bluewing mountains and playa, Porter Spring (preserve historic - mining - artifacts, particularly that ancient dumptruck).	✓			
I support current management practices on cultural and paleontological resources.	✓			
When identifying lands for disposal, please add water, access, minerals and proximity to other commercial areas or historic trails as part of your criteria for selection. Similarly, water, habitat, community water supplies, access and air quality, visual resources should be considered for pieces acquired or disposed of.	✓			
Please address the impacts of OHV's of any type and use the transportation chapter to define where this may occur without upsetting delicate balances within areas such as riparian, streams (perennial or seasonal), or sacred sites.	✓			
Please work with local tribes to identify their cultural resources and work with them to protect or interpret (as they wish) what is important. Emphasize the value internally, educate externally and discourage disruption or destruction of these resources. Summit Lake, Lovelock and others within the RMP have other resources, such as fish or aspen woodlands that have been burned or trampled by visitors. Great care should be provided the fish habitat, the air quality and scenic resources of tribal lands.	✓			
Important cultural sites are often located in association with rare springs, plateau rimrocks, canyons, or pinyon pine nut harvest or associated camp sites. Threats to these sites include increasingly easy road access due roads resulting from livestock facilities and management purposes. Increased or more improved roading leads to vandalism or disturbance of cultural sites. Livestock cause erosion and damage or loss to artifacts and sites - particularly in the vicinity of springs, seeps and other riparian areas. Livestock facility construction causes shifts in livestock use that may lead to new or extended damage to sites - spanning the range from disturbance of rimrock stone blinds, to trampling and breakage of artifacts. Invariably, BLM's cultural specialists are forced to allow range developments to proceed, despite shifted use to new areas that may also have cultural importance.	✓			

Table D-9
Planning Classification for Comments Regarding Cultural Resources and Traditional Values
(continued)

Comment	Planning Classification ¹			
	A	B	C	D
<p>Comprehensive cultural surveys must be conducted in the vicinity of all springs and seeps, and all livestock facilities, and the impacts of current livestock grazing on sites must be studied as part of this process.</p> <p>The best way to protect cultural sites from looting is to limit roading and motorized access to sensitive areas. BLM must analyze significant road closures of salt site roads, or other facility roads (require routine maintenance or salt placement by horseback, limit new livestock developments - that inevitably lead to increased roading), and take other measures to limit ease of access that might damage these sites.</p>				
<p>The impacts of livestock grazing and facilities under all alternatives on paleontological values of these lands must be thoroughly assessed. Paleontological values are threatened by haphazard collection (exacerbated by networks of livestock facility roads) and livestock grazing and trampling that results in site erosion, exposure of fossils or strata and other impacts. BLM must inventory and assess paleontological sites, evaluate impacts of grazing activities and facilities on these sites, and identify measures to be taken to protect them from damage or loss.</p>	✓			

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C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-10
Planning Classification for Comments Regarding RMP Planning Process Issues**

Comment	Planning Classification ¹			
	A	B	C	D
We do not expect to comment on the technical details of the plan or process, but instead, raise an important policy concern that we believe you should consider in the context of the scoping process. We also recognize that BLM's management must remain consistent with the principles of multiple use and sustained yield.	✓			
In review of the 5-Year Evaluations for Paradise/Denio and Sonoma/Gerlach Land Use Plans, we found that no Habitat Management Plans or Conservation Plans were listed in the evaluations. These implementation phase cooperative agreements are the essence of the Wildlife Program with the Bureau of Land Management. Without full and adequate evaluations, the Pre-Plan holds little support or rationale for its Purpose and Needs to fulfill the Wildlife Program. As suggested in the evaluations, terrestrial wildlife requires additional forage allocation outside of the parameters of the present and proposed future implementation phases of land use planning.	✓			
Some of my concerns are "if it is not broken, don't fix it," because generally a new plan incorporates wording to lessen the uses on Public Land. I served eight years on the Sierra Front RAC, which includes this planning area. Not once was the RAC asked to review proposals about land management recommendations, but control was the issue. Every decision emphasized more control and less use. The RAC was used to sort of legitimize the ratchet down effect on Public Lands.	✓			
This comment appears to fall within the Issue "Planning/RMP Process." The public land management by the WFO within this RMP includes a significant area that is a "checkerboard" configuration with public and private ownership. Nothing in the literature or from the discussions at the workshop appear to address this significant interface. Many of the Preliminary Planning Issues cannot be managed within this framework without a comprehensive integrated plan. "Participation" by Nevada State/County personnel in the planning process will not provide for an enforceable commitment for the issues. One simple example: Wilderness, wilderness study area and other special designations criteria are virtually meaningless within the checkerboard area, if they cannot be uniformly applied to and enforced on both the public and private land areas.	✓			
Unless you conduct a comprehensive analysis of the economic and other non-environmental impacts of this plant, your RMP is illegitimate. Your public comment "show" that appeared in early May in Lovelock, Gerlach, and Reno was invalid because it did not alert the public to the potential impact from this plant, robbing the public of the single most important piece of information that they would need to have to evaluate your RMP and to provide informed input to that process. Thus, your planning process is invalid, and your public comment process is invalid, and you should start over.	✓			✓

Table D-10
Planning Classification for Comments Regarding RMP Planning Process Issues *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Also I would bring forward the specific criteria from the MFP and apply it in this RMP. Then those same criteria can be applied in the future (adaptive plan) in the future and the lands would still be based on the qualified MFP. The map can be updated based on the original decision then all lands that are disposed would still be eligible under FLTFA. Alternatives could be developed using different criteria.	✓		✓	
Multiple use management is a complicated task, requiring BLM to strike a balance among many competing uses to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.	✓			
Conservation planning, Habitat Management Plans and Species Management Plans all serve as cooperative agreements and essential elements to past and new land use plans. Federal Regulations require that these state conservation plans must be implemented to the full extent of federal law. For example, Nevada Partners in Flight Bird Conservation, Nevada Bat Conservation Plan, Lone Willow Sage Grouse Population Management Plan, East Range Sage Grouse Population Management Plan, Fox Mountain Habitat Management Plan, Jackson Mountain Habitat Management Plan, Antelope Management Plan, Elk Species Management Plan and Mountain Lion Species Management Plan are all to be included and implemented in the pending Resource Management Plan. Management Framework Plan III Decisions for Sonoma-Gerlach and Paradise-Denio Resource Areas hold strong conservation measures for fish and wildlife resources in Nevada. These fundamental decisions were to be tiered into implementation level decisions that were to achieve the federal mandates for multiple uses. We suggest that those decisions that do not have any need for change should be identified and presented to the public in conclusion of this scoping effort.	✓			
The WFO manages land in the northern portion of Washoe County where the vast majority of the land is in federal ownership. This can mean that management actions by the BLM can have the potential for significant impacts to the residents of these rural communities. The WFO is urged to work directly with the residents and business owners of Gerlach and Empire and the scattered residents in the area to involve them in the RMP process.	✓			
In the proposed plan and alternatives I would encourage using criteria or standards for as many decisions as possible. They can be site specifically applied in time so you have a real plan. When conditions change, you can reapply the criteria and update the maps. For example, a route can be open but would be closed or limited if certain resource conditions change such as erosion, sage grouse lek, register eligible site, safety hazard, etc.	✓			
BLM needs to make clear at the very beginning of the EIS process that there are a host of other important and significant public lands values in these lands, so that protection and enhancement of these values will drive the EIS effort and a range of reasonable alternatives, its land management	✓			

Table D-10
Planning Classification for Comments Regarding RMP Planning Process Issues *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
decisions, and habitat enhancement or restoration actions.				
Within the context of the FLPMA, in the Winnemucca DRMP/EIS, BLM's Field Office will prepare different combinations of land management to address issues and resolve conflicts among uses. The alternatives likely will represent possible management scenarios and reflect a reasonable range of potential future land use and resource management scenarios. We feel that it is critical that the alternatives offer various scenarios that address the energy crisis affecting the nation at this time.	✓			
I would urge the agency to work in cooperation with and include all the livestock permittees involved, in developing this Resource Management Plan. Hopefully by working together in its development, it will lead to a greater acceptance of the plan in the end.	✓			
The BLM should develop this RMP in the context of the Mining and Minerals Policy Act of 1970's national policy to foster and encourage private enterprise in developing economically sound and stable domestic mining and minerals industries (30 USC 21a), as well as the Federal Land Policy and Management Act's multiple-use mandate (43 USC 1732) and policy to recognize the Nation's need for domestic sources of minerals (43 USC 1701(a)(12)).	✓			
Continue current management practices and cooperative agreements with NDOW.	✓			
In general try very hard to think forward rather than backward, don't be afraid to include things that might not seem completely realistic today. If you only address things that you know about today and have happened in the past your plan will be out of date very soon. You might want to brainstorm with the subgroup, contractor, and staff to identify future activities that you can deal with. If nothing else the 4-8 hours would be challenging and enjoyable and might yield some very useful future public land uses.	✓			
We recognize that it is not easy to balance other competing interests with the public interest in obtaining a reliable, clean, domestic supply of energy. We believe that BLM can propose workable and well thought out alternatives in its Winnemucca DRMP/EIS, but must consider the policy initiatives discussed herein when finalizing its work product. AGA urges you to give appropriate weight to the broad environmental, economic, national security, and public health impacts when considering access to natural gas supply at a time when we need to increase supply to meet rising demand.	✓			
Management Plans are always a trial and error methodology. Back in the early 70s, the BLM was spraying sagebrush to enhance more room for grass species. Now the plan is to burn more. Overall, no one knows anything about Mother Nature and its delicate balance that man lives in, so let's be careful and not screw it up too. I feel that more sound science and less political science should prevail in this plan. I don't care what the "public feels" if it cannot be backed by sound science.	✓			

Table D-10
Planning Classification for Comments Regarding RMP Planning Process Issues *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
Has BLM surveyed Burning Man management as to its intended response to this plant? Has Burning Man management surveyed their own participants to assess the impact of haze and the general disgust and disdain they may feel for BLM and the Burning Man management if they facilitate placing this plant into operation?	✓			
Can you explain the process by which the RMP was planned, and how it was decided that the proposed power plant would not be a featured part of your public comment efforts? Who was involved in this decision?	✓			
There is a persistent rumor among BLM rank-and-filers that certain BLM officers have been pressured to fast-track Sempra's applications. Can you confirm or deny that you were under any pressure to downplay this power plant as part of your RMP? Do you know of any other BLM managers who have been pressured in any way to accelerate processes related to Sempra's plans?				✓
Encouraging the use of Coordinated Resource Management (CRM) or other collaborative efforts that involve all directly affected interests in reaching agreement on land management decisions.	✓			
Agencies are increasingly relying on what is termed "adaptive management" as an excuse for not taking decisive action necessary to protect resources of public lands during planning processes. This results in a vacuum of management direction, with resources suffering. Use of adaptive management should be minimized, and a set of clear actions laid out for management situation/challenges: "If X happens, then Y will happen", not - "we'll just keep trying something different and never act to really alter situations that are causing harm".	✓			

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B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort

**Table D-11
Planning Classification for Comments Regarding the Granite Fox Power Plant Project**

Comment	Planning Classification ¹			
	A	B	C	D
<p>We note that the current plan is nearly 30 years old and never recognized the pressures that public lands and natural resources now face us, nor the duration of time that RMP's must be in practice.</p> <p>We want to provide data that will show that any other economic use of water in the general Smoke Creek area will be eliminated into the foreseeable future by the development of a coal plant such as that proposed by Sempra plant. This theme is predominant throughout these comments. In addition, the results of granting rights-of-way to such plants will eliminate for the foreseeable future the development of renewable energies such as solar, wind and geothermal in an identified area of renewable resources.</p> <p>We do have a list of questions that we will be offering as scoping comments for the Sempra Granite Fox EIS next month. We request that this list developed for the Sempra scoping be included into the scoping response for this RMP BIS at a future date. We make this request in the hope that it will aid you in creating a framework in the RMP that will help you address these industrial issues in future NEPA processes.</p>				✓
<p>Unless you conduct a comprehensive analysis of the economic and other non-environmental impacts of this plant, your RMP is illegitimate. Your public comment "show" that appeared in early May in Lovelock, Gerlach, and Reno was invalid because it did not alert the public to the potential impact from this plant, robbing the public of the single most important piece of information that they would need to have to evaluate your RMP and to provide informed input to that process. Thus, your planning process is invalid, and your public comment process is invalid, and you should start over.</p> <p>In short, this proposed plant will change everything about northwest Nevada, and your RMP appears to have totally ignored this pending, monumental variable.</p> <p>If you develop a resource management plan that doesn't account for the removal of 25,000 (or more) acre-feet of water from your watershed, your hydrological plans are invalid. Completely, utterly meaningless.</p> <p>If you don't plan for recreation impacts from the plant--for example but not limited to haze (aesthetic impact), mercury poisoning of fisheries, the removal of species due to extreme desiccation of the land, the possible choice of sportsmen (and sportswomen) to choose other areas for their recreation due to their desire to avoid the plant's visual and environmental pollutions--your recreation plans are invalid.</p> <p>If you don't plan for wildlife impacts, in particular, the long-term impacts of dropping tons of mercury-laden particulates onto the lands under your management, and the long-term impact of mining water and removing surface water that was, in the past, available--then your wildlife management plans are invalid.</p> <p>If you don't plan for all potential impacts to existing farming and ranching operations in this district, then your economic plans are invalid.</p>				✓
<p>Sempra Granite/Fox Proposal: The RMP must establish a framework from which to guide and develop future NEPA documents as needed within the district. We believe it is imperative that this RMP EIS develop significant</p>				✓

Table D-11
Planning Classification for Comments Regarding the Granite Fox Power Plant Project *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
<p>guidelines pertaining to power plants such as the Sempra Granite Fox proposal as it can be demonstrated that these substantial industrial facilities will impact the district more than any other multiple use. We also urge to write and approve this plan prior to other major land use decision making. Major recreation, mining, livestock grazing, watershed maintenance, Wilderness, and other land uses, significant wildlife, cultural, and scenic resources are all part of the Winnemucca District's multiple resources. As per 43CFR Part 1600, we suggest that standards and guidelines for analyzing, measuring and mitigating impacts to these resources by coal power plants such as the Granite Fox proposed power plant be developed as part of your Resource Management Plan. The RMP will be incomplete without those guidelines in place prior to future NEPA analysis and decisions for such plants. The Winnemucca District must have the required framework in the Management Plan to structure such NEPA analysis as required by 43 CFR Part 1600. Because your current RMP is so old, we suggest that it barely qualifies as a policy document and certainly appears to be insufficient or inadequate for weighing and balancing public interest and needs.</p> <p>CFR43 Sec. 1601.0-5: "Resource management plans are designed to guide and control future management actions and the development of subsequent, more detailed and limited scope plans for resources and uses." Therefore this RMP EIS must contain adequate discussion to guide future development of the EIS for the Sempra Granite Fox power plant.</p>				
<p>We have clean air, can see all the stars at night. The plant will effect our air, with smoke and pollution, also create a smog which we will have forever, 1 to 2 trains of a 100 car each will create a lot of smoke; ash, mercury, which will kill our fish, animals and others will wade in the ash; even a few humans (do you plan to dump the ash on top of the ground or underneath the ground). Nevada gust winds will blow it all over the state and the lakes; we will have to breathe some of it for sure.</p> <p>Coal miners consumption is very bad; R. Reader Engingeers & firemen back in steam engine days had a lot of it from the coal burners; drs. of Tuscon, Arizona TB Hospital who cared for all of those who had it who came for treatment of railroads of the US came there for treatment all of that stopped when ____ (?) on rails came into use. We don't need the coal burner for Calif. electric use. Let them build their own generator. My feeling.</p>	✓			✓
<p>I am absolutely opposed to Sempra Generation's proposed desecration of the Smoke Creek Basin's air and water depletion aka the Granite Fox Coal Fired Power Plant. Clean coal is an oxymoron offered to us by morons.</p>				✓
<p>First and foremost, no Granite Fox Coal Plant.</p>				✓
<p>I would like to see this RMP address the Sempra coal fired power plant project that is being proposed in this planning area, since it will greatly impact this area. Better yet, I would like to see a withdrawal on development of fossil fuel projects.</p>				✓
<p>If you don't plan for recreation impacts from the plant--for example but not limited to haze (aesthetic impact), mercury poisoning of fisheries, the</p>	✓			✓

Table D-11
Planning Classification for Comments Regarding the Granite Fox Power Plant Project *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
removal of species due to extreme desiccation of the land, the possible choice of sportsmen (and sportswomen) to choose other areas for their recreation due to their desire to avoid the plant's visual and environmental pollutions--your recreation plans are invalid.				
If you develop a resource management plan that doesn't account for the removal of 25,000 (or more) acre-feet of water from your watershed, your hydrological plans are invalid. Completely, utterly meaningless.	✓			✓
How much pollution damage to watersheds would it take for BLM to decide to block their own participation in the Sempra plant? Which pollutants will first become a critical issue? Are these standards set now, and if not, why not?				✓
How much water removal damage would it take for BLM to decide to block their own participation in the Sempra plant? Is this standard set now, and if not, why not?				✓
Is the Smoke Creek watershed tied to Honey Lake and Pyramid Lake, as the area's Paiutes have believed for centuries? How will the BLM answer this question, which seems absolutely critical in assessing water impacts from this plant and for any type of valid RMP?				✓
Do you have any intention of protecting your precious Black Rock NCA from the pollution of Fox Granite Sempra!				✓
One thing I fear may have been overlooked is Sempra Energy's plan for a coal fired power plant just outside the NCA. The water needs alone would have a major impact on any plans inside the NCA. This plant would burn the cheaper high sulfur coal from nearby Wyoming rather than ship more expensive, cleaner anthracite from Pennsylvania and West Virginia. Will the RMP be revised to handle this new threat?				✓
The BLM should do everything in their power to stop the process and construction of the coal-fired energy plant planned by SEMPRE Energy in the Gerlach area. This plant will contaminate our soil, water and air, and greatly effect our quality of life. This plant will not benefit this area as all the power generated will go to California. Let California build their own plant. Keep the pollution in their state.				✓
I am a Gerlach resident adamantly opposed to the proposed Sempra Power Plant. I am concerned as to why this proposed plant is not included in your 20 year plan. This plant should not be built here! Why is it not even mentioned in your outline?				✓
Health for Gerlach and surrounding people in a large area in California, Oregon and Nevada. I am totally against the coal producing electric plant. Please do not build in our area, I have been here from So. California for 42 years now. Please don't ruin this good place.				✓
I am totally against this Project [re. SEMPRE Power Plant]				✓
I am concerned with the possible mercury poisoning that is possible with the construction of the SEMPRE power plant. I feel renewable resources would be a better alternative, which could also be utilized by the community and surrounding farms.				✓
Keep coal-burning and other pollution-causing industry out of the area. It				✓

Table D-11
Planning Classification for Comments Regarding the Granite Fox Power Plant Project *(continued)*

Comment	Planning Classification ¹			
	A	B	C	D
is one of the last untouched areas in the US - please keep it that way.				
Finally, having met you and your staff, I can state that I believe your intentions are benevolent. However, I cannot understand how you could think that the proposed Sempra power plant was not a key factor in any long-range use plan for the BLM in this district. Will you consider restructuring and totally restarting your RMP process to make it valid? If not, will you please provide at least clear and unequivocal assurances that this huge variable will be fully incorporated into a more realistic planning process, and that all your modeling will be prepared based on multiple scenarios, some with the plant and some without, for every aspect of the RMP?				✓
Is BLM willing to delay the RMP until it can make full use of the Sempra EIS? If not, why not?				✓

¹ Comments are classified as follows:

A – will be addressed/considered in the RMP

B – will be resolved through policy or administrative actions

C – are already being addressed or will be addressed independent of the RMP effort

D – determined to be beyond the scope of the RMP effort