United States Department of the Interior
Bureau of Land Management

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Reno, Nevada 89520

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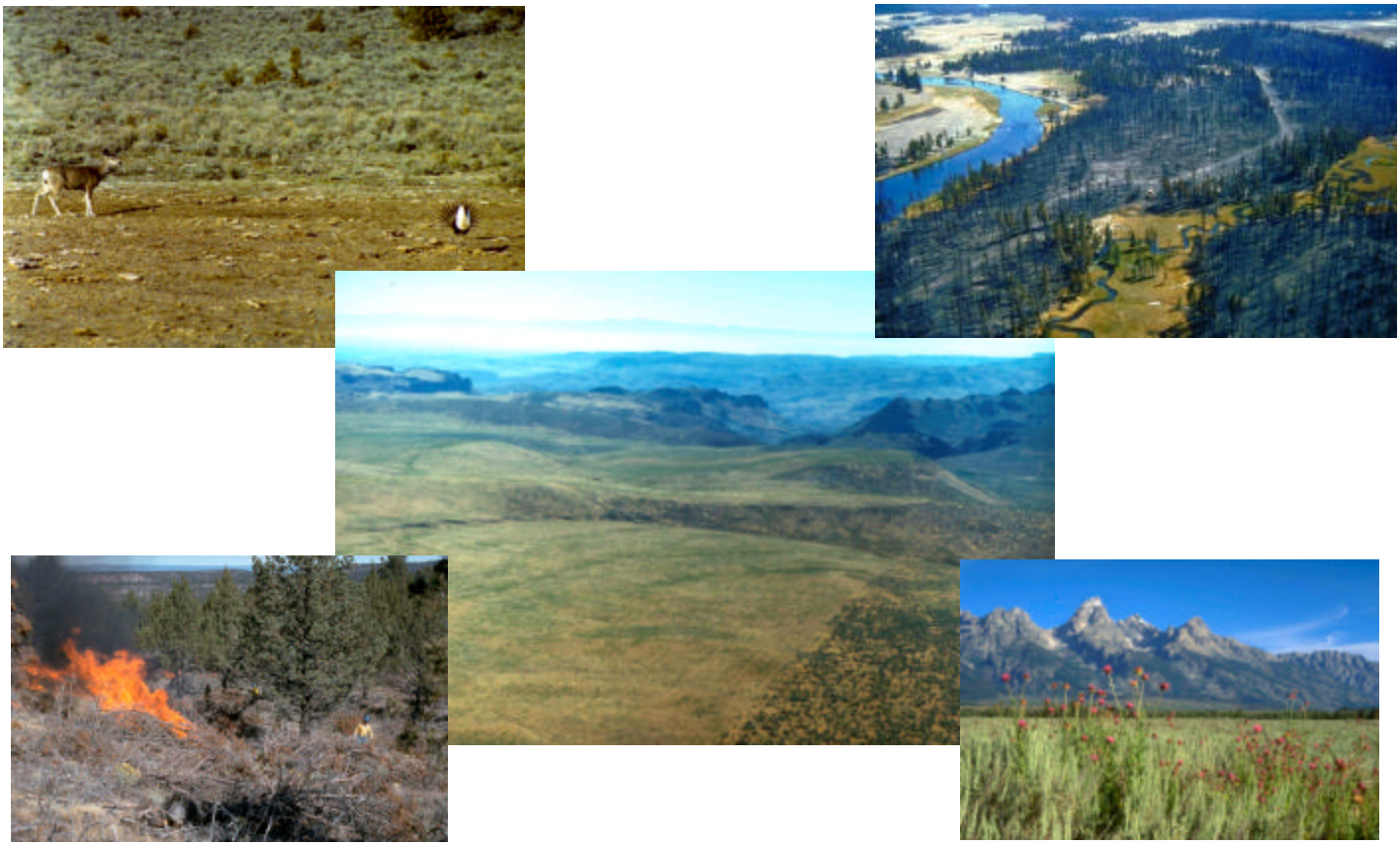
Scoping Comment Summary Report for the Vegetation Treatments Programmatic Environmental Impact Statement



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1.0 SUMMARY OF PUBLIC AND AGENCY SCOPING ACTIVITIES

1.1 INTRODUCTION

Four Bureau of Land Management (BLM) National Environmental Policy Act (NEPA) programmatic vegetation treatment Environmental Impact Statements (EISs) were developed in the mid 1980s to early 1990s to assess vegetation treatment alternatives on BLM-managed lands in the western U.S. The four EISs are:

? Northwest Area Noxious Weed Control Program - 1986
? California Vegetation Management - 1988
? Vegetation Treatment of BLM Lands in Thirteen Western States - 1991
? Western Oregon Program Management of Competing Vegetation - 1992

Treatment alternatives included the use of mechanical and manual manipulation, herbicides, cultural controls, biological agents, and prescribed fire. These documents are reaching the limits of their usefulness, however, because:

? The analyses in the EISs are over a decade old;
? The BLM has implemented new policies and programs to manage vegetation;
? New information on vegetation treatment methods and impacts has become available during the past decade; and
? The BLM vegetation management objectives and number of acres that must be treated have changed substantially during the past 10 years.

The BLM has adopted and implemented several significant policies in recent years that affect vegetation management. These include the Federal Wildland Fire Policy, the Rangeland Health Standards and Guidelines, the Northwest Forest Plan, the National Fire Plan, and the Unified Federal Policy. The Emergency Stabilization and Rehabilitation Program, which is responsible for stabilizing and rehabilitating lands damaged by wildfires, has grown considerably in recent years, especially following fires that occurred during fiscal year (FY) 1999 and FY 2000. There is an increased emphasis in the BLM on using vegetation management to improve water quality and watershed functionality, and to control the spread of weeds. In addition, the development of conservation strategies for threatened, endangered, and special status species on lands administered by the BLM requires both habitat conservation and modification as habitat protection needs grow in the face of increasing human demands.

As a result of these policies and initiatives, the number of acres that must be treated on BLM lands continues to grow. Under the Record of Decisions (RODs) for the earlier EISs, the average number of acres that could be treated annually was about 506,853 acres. Today, the BLM is proposing a program to treat approximately 6 million acres annually. Treatments would involve several BLM program areas, including prescribed and managed natural fire, integrated weed management, hazardous fuels reduction, and emergency stabilization and rehabilitation of lands burned by wildfires, as well as landscape level restoration initiatives such as the Great Basin Restoration Initiative. The goals of this program would be to:

? Manage vegetation on approximately 6 million acres annually in 18 western states, including Alaska.

? Utilize a variety of techniques, including prescribed fire, herbicides, biological and cultural control agents, and mechanical and manual means, as part of an integrated vegetation management program.

? Restore habitats to conserve multiple species of plants and animals, with priority given to special status species and wetland and riparian habitats.

? Use new chemicals to control vegetation that are more beneficial than herbicides currently used by the BLM, and that do not adversely impact human health or the environment.

- ? Develop protocols to evaluate the risks associated with the use of chemicals that may be developed in the future for controlling invasive vegetation to determine if these chemicals are safe for use by the BLM.

- ? Update information and analyses provided in the earlier programmatic EISs, where necessary, to ensure that ongoing and proposed vegetation treatment methods are safe for humans and the environment and meet treatment objectives.

- ? Provide vegetation management guidance to local field offices for use in developing their land use and vegetation treatment plans.

- ? Ensure compliance with applicable federal, state, local, and tribal laws, regulations, statutes, policies, and management plans.

As part of this proposal the BLM is preparing a *Vegetation Treatments Programmatic EIS* that will evaluate proposed vegetation treatment alternatives on lands managed by the BLM in the western continental U.S., and Alaska. As part of the development process for the EIS, the BLM held public scoping from October 12, 2001, through March 29, 2002, to allow the public to comment on the proposal. Comments on the proposal could be submitted in writing to the BLM Project Manager. In addition, the BLM held 18 public scoping meetings in the western U.S., and one scoping meeting in Washington, D.C. Written and oral comments were accepted at these meetings, and a court reporter prepared a transcript of the comments given at each meeting.

The scoping process is initiated by the publication of a Notice of Intent in the Federal Register and in local newspapers. The scoping process includes holding at least one public meeting per affected area and requesting written and oral comments on what issues and environmental concerns the EIS should address.

The geographical areas affected by this EIS include all surface estate public lands administered by the BLM in the western United States and Alaska. These public lands are administered by 11 BLM field offices which include: Alaska, Arizona, California, Colorado, Idaho, Montana/Dakotas, New Mexico/Oklahoma/Texas/Kansas, Nevada, Oregon/Washington, Utah, and Wyoming/Nebraska.

1.2 PUBLIC NOTICES AND NEWS RELEASES

On October 11, 2002, the BLM published a Federal Register Notice of Intent notifying the public that the BLM had formed a team to prepare an Environmental Impact Statement (EIS) on the treatment of vegetation on BLM-administered lands in the western U.S., including Alaska. The Notice of Intent also stated that the period in which comments would be taken on the proposal would be from October 12, 2001, through November 11, 2001.

A second Federal Register Notice was published on January 2, 2002, notifying the public of the locations of public scoping meetings, and extending the public comment period until March 29, 2002.

A third Federal Register Notice was published on January 22, 2002, notifying the public of changes to the schedule and scope of the public scoping.

All affected states issued public notices of the scoping period, which were placed in newspapers in or near locations where public meetings were held. In addition, information on the location of scoping meetings was provided in early December 2001, and again in early January 2002, by electronic mail to all members of the public that had placed their names on the electronic mailing list for the project before the date of the announcements.

1.3 PUBLIC MEETINGS

Nineteen public meetings were held in 12 western states, including Alaska, and in Washington, D.C. The locations and dates of these meetings are summarized in Table 1-1.

The scoping meetings were conducted in an open-house style. Informational displays were provided at the meeting, and handouts describing the project, the NEPA process, and issues/alternatives were given to the public. In addition, a formal presentation provided the public with additional information on program goals and objectives. The formal presentation was followed by a question and answer session.

TABLE 1-1

Location and Dates of Public Scoping Meetings

State	Locations	Dates	Number of Attendees[a]
Alaska	Anchorage	March 6	3
Arizona	Phoenix	February 4[b]	32
California	Alturas	February 5	28
	Bakersfield	February 26	26
Colorado	Grand Junction	January 24[b]	42
Idaho	Boise	February 13	36
	Twin Falls	February 14	19
Montana	Miles City	January 29	14
	Helena	February 11	16
Nevada	Reno	February 19	11
	Elko	February 21	16
New Mexico	Socorro	February 25	28
Oregon	Portland	March 4	32
Utah	St. George	January 22	33
	Salt Lake City	January 23	25
Washington	Spokane	February 28	14
Wyoming	Rock Springs	January 30	28
	Worland	January 31	36
Washington, DC	Washington, DC	March 12	16

a - Number of attendees based on number of people signing in at the meeting.
b - Two scoping meetings were held at this location, one in the afternoon and one in the evening.

1.4 AGENCY MEETINGS

One agency meeting was held at the Fairbanks, Alaska, office of the BLM and involved staff from the BLM and Alaska Fire Service, based at Fort Wainwright, Alaska.

2.0 COMMENT STATISTICS

The BLM received 1,034 requests from individuals, organizations, and government agencies, to be placed on the project mailing list, and 381 written comment letters or facsimiles on the proposal to prepare a *Vegetation Treatments Programmatic EIS*. In addition, comments were taken from the public at the public scoping meetings, although not all individuals were able to be identified at the meeting, making it difficult to determine the exact number of individuals presenting comments at the public meetings. Based on written and oral comments given during the scoping period, 2,838 catalogued individual comments were given during scoping on the *Vegetation Treatments Programmatic EIS*.

Table 2-1 summarizes the number of individuals/organizations requesting to be placed on the mailing list, and the number of written comments received, for each state. This is not a complete list of all individuals/organizations requesting to be placed on the mailing list or providing comments for each state, as some comments were received by electronic mail transmissions that did not provide an address. In addition, multiple individuals signed some letters, or referenced members of the organization, but were counted only once.

Table 2-2, Comment Subject Breakdown, provides the number of individual comments received on the EIS by relevant section of the EIS. It should be noted that some comments could fit in more than one category, but were only counted once.

TABLE 2-1

Summary of Individuals Requesting to be Placed on the Mailing List and Providing Oral or Written Comments

State	Number of Individuals Requesting to Be Placed on Mailing List	Number of Oral Comments Given at Scoping Meetings[a]	Number of Individuals/Organizations Providing Written Comments
Alaska	19	8	11
Arizona	78	33	24
California	144	75	60
Colorado	59	33	12
District of Columbia	27	40	0
Idaho	80	67	24
Montana	59	54	28
Nebraska	2	0	1
North Dakota	1	0	0
New Mexico	56	36	23
Nevada	46	41	19
Oklahoma	2	0	1
Oregon	105	15	48
Texas	3	0	0
Utah	91	56	23
Washington	48	40	30
Wyoming	81	59	13
Other States[b]	30	NA	13
State Unknown	103	NA	51
Totals	1,034	567	381

a – Since not all individuals were identified at each meeting while giving comments, the number of comments given are listed here, but more than one comment may have been given by an individual.

b – Other states include Alabama, Hawaii, Illinois, Kentucky, Massachusetts, Maryland, Michigan, Missouri, North Carolina, New Jersey, New York, Texas, and Virginia.

NA – Not applicable.

TABLE 2-2

Comment Subject Breakdown

Comment Subject	Number of Comments	Percent of Total
Proposed Action and Purpose and Need		
Project Purpose and Need	97	3.4
Causes of Land Use Impacts	291	10.3
Documents that Influence Scope of EIS	8	0.3
Scope of Analysis and Decisions to be Made	116	4.1
Relationships to Statues, Regulations, and Policies	30	1.1
Interrelationships and Cooperating Agencies	102	3.6
Consultation	9	0.3
Public Involvement and Scoping	5	0.2
Alternatives		
Policies, Initiatives, and Programs Influencing Development of Alternatives	59	2.1
Treatment Methods Evaluated	145	5.1
Chemicals Evaluated	35	1.2
No Action and Proposed Action Alternatives	43	1.5
Other Proposed Alternatives	276	9.7
Restoration Goals, Best Management Practices, and Management Objectives	417	14.7
Affected Environment		
Air Quality	11	0.4
Water Quality	1	0.0
Environmental Consequences		
General	53	1.9
Fire Ecology	3	0.1
Air Quality	12	0.4
Soils	18	0.6
Water Quality	67	2.4
Vegetation	217	7.6
Fish	6	0.2
Wildlife	70	2.5
Species of Concern	50	1.8
Livestock (impacts to livestock)	3	0.1
Special Designation Areas	9	0.3
Rights-of-Way	12	0.4
Oil, Gas, and Minerals Development	5	0.2
Cultural Resources	8	0.3
Recreation	15	0.5
Human Health and Ecological Risk Assessment	91	3.2
Socioeconomics	68	2.4
Other Comments		
Terminology	21	0.7
Document Production	3	0.1
Issues/Comments Not Considered in EIS	462	16.3
Total Comments	2,838	

3.0 SUMMARY OF COMMENTS

3.1 PROPOSED ACTION AND PURPOSE AND NEED

3.1.1 Purpose and Need for Action

3.1.1.1 Purpose and Need

A few individuals who commented were unclear about the need for, purpose, and intent of the EIS. Many respondents stated that the program goals should be long-term ecosystem sustainability, biological diversity, and watershed restoration. Others felt it was important to focus on reducing wildfire risk, particularly in urban areas. Many respondents suggested addressing all invasive and exotic plants (i.e., not just weed species) and replacing them with native species. A few comments suggested considering delisting species currently on the Endangered Species List. The need for clearly defined long-term restoration and conservation objectives, particularly in terms of achieving a perennial ecosystem that maximizes the ability of desirable vegetation to outcompete weeds, was expressed. One respondent also suggested including goals for reducing the acreage requiring treatment. Another individual felt a need for the EIS to explain the significant increase in treatment area. Some comments stated that explanations concerning the health of the land, how much is in poor health, how it reached the existing state, and how the BLM would manage it to reach the desired future condition, be given. In addition, one individual doubted that the proposed treatments would be adequate to solve the problem.

3.1.1.2 Causes of Land Degradation and Weeds

A large number of comments were received suggesting that the EIS consider how the full range of land use impacts has led to the decline of native species and ecosystems, either directly, indirectly, or cumulatively, through factors including: fire suppression, energy exploration and development, livestock grazing, logging, mining, roads, motorized vehicles, and recreational activities. Removing the underlying causes of noxious weed spread and preventative actions, rather than treatments, should be the focus of the EIS. One respondent wanted to see the use of landscape-level analysis in assessing land use impacts on native vegetation and wildlife habitat. Identifying how weed species are introduced and addressing the fact that exotic species are still being introduced needs to be considered. One individual wanted to know why cheatgrass is not a problem in Russia, and another inquired about how invasive species have changed the fuel/fire interaction. Concern was raised about practices that degrade the condition of riparian and wetland areas. One respondent suggested not treating symptoms that are likely to recur, while another suggested not assessing the causes of the current situation at all.

3.1.2 Documents that Influence the Scope of this EIS

Several comments were related to how the old EISs would be incorporated into this one and inquired whether this EIS is a cost-saving measure. One respondent suggested starting with information already in existence. Another wondered how the content of the EIS would compare to what is in the BLM manuals. One comment suggested referring to the Bonneville Power Administration's (BPA's) *Transmission System Vegetation Management Program Final EIS*.

3.1.3 Scope of Analysis and Decisions to Be Made

Many respondents stated that the BLM should focus on the underlying causes of the issues identified (such as livestock grazing, motorized off-road vehicles, unregulated recreation, hunting and fishing, livestock trespassing, road building, and logging) rather than ineffective treatments. However, one remark also suggested focusing on the treatment of manageable areas rather than root causes. One individual wanted to know if the EIS would issue regulations, while another inquired about the expected life of the EIS. A couple of comments related to how site-specific the analysis

would be. Concerns about how restoration issues would be addressed, as opposed to other processes, were also raised. A couple of respondents wondered why timber harvesting was excluded from the EIS.

3.1.4 Relationship to Statutes, Regulations, and Policies

One comment specified addressing NEPA requirements, while others mentioned considering the Clean Water Act and Clean Air Act. One respondent noted that based on a court decision, users of aquatic pesticides may be required to obtain a National Pollution Discharge Elimination System (NPDES) permit for application of these products. A few respondents suggested that equal consideration be given to all parties, whether industry, local residents, or environmental groups.

3.1.4.1 Tiering

A few individuals asked about how future NEPA documents would be tiered off of this programmatic EIS. Some individuals wondered how this EIS would be incorporated with other plans, such as other ongoing vegetation management programs and BLM Resource Management Plans. The need for consistent implementation between BLM offices across multiple states was raised, while others wanted to know if local offices would have input into the EIS. One individual wanted to know if Resource Management Plans would be amended as part of this EIS. Others were concerned that other BLM planned projects may be restricted or delayed because of this EIS. One respondent inquired if local EISs would be more detailed. Another individual wondered if right-of-way projects would require a specific project EIS. A comment was received inquiring if other agencies would use this EIS.

3.1.5 Interrelationships and Cooperating Agencies

A couple of respondents inquired about how other agencies were cooperating with the BLM and how this program would be integrated into other ongoing BLM planning efforts. One comment stated that the BLM should take the lead on vegetation treatments over other agencies. A number of respondents stressed the importance of cooperation among federal, state, and local governments, tribes, non-government organizations (NGOs), and private landowners on prevention, education, and control. More specifically, some respondents suggested coordination between management of federal and private lands so that consistent actions are taken across administrative boundaries. In particular, one respondent stressed that public land management must compliment the uses of private land in the area. Several comments suggested integration of federal efforts between the BLM, National Park Service, U.S. Fish and Wildlife Service, U.S. Forest Service, U.S. Department of Agriculture, Bureau of Reclamation, Army Corps of Engineers, and the Environmental Protection Agency, and the inclusion of language on how these and other agencies would cooperate. One comment proposed entering into a Memorandum of Understanding with individual states under 7 United States Code (USC) Section 2814, "Management of Undesirable Plants on Federal Lands." Many respondents suggested that the BLM consult and cooperate with specific national, state, and local organizations or programs, including: state land resource protection agencies, Animal and Plant Health Inspection Service (APHIS), Western Governor's Association, National Association of Counties, Western Area Power Administration, local air agencies, local fire agencies, Weed Science Society, Invasive Species Council, local weed control districts, European Biological Control Laboratory, local and state livestock organizations, state grazing boards, Western States' sage grouse coordinators, National Wool Growers, and National Cattleman's Association. One individual was concerned about protecting the State of Wyoming Office of State Lands and Investments' ability to develop their mineral estate. A number of comments were related to coordinating treatment on lands adjacent to the BLM treatment areas. Establishing a technical advisory committee to help the BLM personnel make wise decisions about herbicide use was suggested. One individual wanted to know if the BLM is working with the U.S. Forest Service on the sage grouse. Another comment encouraged the BLM to use funds to support local government weed management. One comment stressed that existing weed control efforts should not be duplicated.

3.1.6 Consultation

There were several comments relating to how the Endangered Species Act and Habitat Conservation Plans would be addressed. Some respondents encouraged coordination with the U.S. Fish and Wildlife Service and National Marine Fisheries Service. One respondent asked how consultation with Native American tribes was conducted and suggested having separate meetings with the tribes. Consultation with the Indian Basketweaver Organization was specifically mentioned. Another comment encouraged the involvement of archaeologists and Native Americans in cultural resource issues.

3.1.7 Public Involvement, Scoping, and Issues

Several comments encouraged the facilitation of public participation in all steps of the EIS. Another comment requested that the method by which scoping comments are addressed be described.

3.2 ALTERNATIVES INCLUDING THE PROPOSED ACTION

3.2.1 Policies, Initiatives, and Programs Influencing Development of Alternatives

Several respondents asked who determined how much land will be treated by each method and who authorizes these decisions. Other individuals wondered if the treatment area goals are realistic.

3.2.1.1 Cohesive Strategy

One comment suggested integrating the National Fire Plan, the Cohesive Federal Strategy for Restoration in Fire Adapted Ecosystems, and the work of the National Invasive Species Council. A couple of comments asked why fire and mechanical treatments were favored weed control methods. One respondent requested identifying the location and level of risk of high-risk urban interfaces.

3.2.1.2 Integrated Weed Management Program

A couple of comments encouraged the BLM to take the lead on noxious weed control and to develop a group to fight weeds. Some comments stressed the importance of weed control activities, but another respondent felt that noxious weeds should be considered separately from fire issues. A few respondents doubted if enough land would be treated to get the weed problem under control.

3.2.1.3 Rangeland Management

One comment inquired as to whether grazing areas would be treated.

3.2.1.4 Riparian Area Management

There were a couple of comments concerned with the restoration and protection of riparian and wetland areas.

3.2.1.5 Other Programs

One comment was received that suggested considering rights-of-way and recreational areas.

3.2.2 Funding

Several comments were concerned with how the project would be funded, while one respondent was specifically concerned about whether the BLM would be able to treat the 6 million acres annually at current funding levels. One

respondent suggested that funding should be consistent from year to year. Many comments inquired about whether adequate funding was available. One respondent wanted to know specifically how much money has been appropriated by Congress for this project. There were some specific questions about how funding is shared between states, whether funding is distributed by individual method or if it can be used for any method, and whether revegetation costs are included in the budget. One comment inquired if funding is "hooked into" the EIS. Another respondent stressed the importance of obtaining adequate funding for fuels reduction, and that this fund should be separate from the weed control fund. Several others felt that funding for monitoring should be independent of other funding. One person felt that more money should be allocated to noxious weed removal efforts, while another respondent felt that more money and personnel should be allocated to monitoring endangered species. The question of what will happen if funding runs out was also raised.

3.2.3 Treatment Methods Evaluated Under the Proposed Alternative

A few respondents suggested that all treatment methods should be given equal consideration. A number of respondents encouraged using Integrated Resource Management and/or Integrated Weed (Pest) Management. A couple of respondents stressed that the goal of Integrated Pest Management is to reduce the use of chemicals.

3.2.3.1 Fire

Many respondents felt that naturally occurring fires should be allowed to burn and that fire should be restored to BLM lands. One respondent specifically encouraged the use of fire to improve ecosystem health and to reduce hazards. Another respondent was concerned about where fire would be used. Several comments suggested only using fire when and where it is appropriate. A couple of respondents would like to see a discussion of using fire for weed control. One respondent felt that human-imposed fires based on past fire intervals cannot be considered natural. Concern was expressed for prescribed burns near human structures and fragile environments and the risk of prescribed fires getting out of control. One comment noted that in the boreal forest of Alaska, prescribed burns of 10,000 to 100,000 acres are within the normal size distribution of wildland fires. Another respondent disagreed with the notion that fire issues are a scientifically defensible context for restoration.

3.2.3.2 Mechanical

A couple of comments recommended using the full range of mechanical treatments, including chaining, mowing, and mulching. One respondent called for the end of the practice of tree chaining. Some respondents were concerned that timber harvesting would be used to justify fuel reduction, while another recommended it. One respondent suggested using a masticator to break down fuels, leading to more rapid decomposition, mulching, erosion control, and habitat improvement.

3.2.3.3 Herbicides

Many comments recommended limiting the use of herbicides, exploring the use of newer, less toxic herbicides, and giving preference to ground over aerial application. One respondent noted that herbicides are not effective, while others felt that herbicides are more effective than other methods for weed suppression. One respondent inquired about the timing of herbicide applications.

3.2.3.4 Cultural

One comment recommended using holistic management of grazing. Several respondents encouraged the use of grazing as a weed control tool, particularly sheep and short-term intensive cattle grazing. It was also noted that sheep help push seeds into the ground.

3.2.3.5 Biological

A couple of comments encouraged experimenting with the use of biological control for managing unwanted vegetation. Concern was expressed about the fate of biological control agents after the vegetation is controlled and keeping biological control agents contained. One respondent inquired whether the BLM or APHIS does risk assessments on biological control agents. One respondent expressed a need to further examine natural controls.

3.2.4 Chemicals Evaluated Under Proposed Alternatives

One respondent inquired about whether the list of potential herbicides has been established yet. Several respondents were concerned about the criteria used for consideration of herbicides, how they are evaluated, and who evaluates them. A couple of respondents wondered if herbicides in the old EIS could be carried over, whether previously completed herbicide risk assessments were still adequate and valid, or whether herbicides not on the list could be used. One respondent suggested that the use of currently approved herbicides should not be prohibited. Others wanted to reassess currently used herbicides, and inquired about what new herbicides would be evaluated. One respondent recommended having a wide range of herbicides available for use, while several others recommended the continued evaluation of new chemicals as they are discovered in the future. Questions about specific herbicides were also raised, including the consideration of sulfonylurea herbicides, which the respondent believed have a very narrow ratio of effective to excessive dose. The following herbicides were recommended to be included in the EIS: Imazapic (Plateau), Quinclorac, Olympus, Diflufenzopyr, Glyphosate (Glyfos and Glyfos X-TRA brands), and Oust. A couple of respondents wondered whether Oust and Spike have been or will be evaluated. A specific question regarding the use of herbicides to treat all vegetation (as opposed to not just noxious weeds) in Oregon was also raised.

3.2.5 Proposed Action and Alternatives

One comment questioned what alternative treatments might be developed. One respondent felt the EIS should give equal consideration to all alternatives, while another suggested thoroughly evaluating the no action alternative.

3.2.5.1 Alternative A - No Action

Several respondents requested accounting for the acreage of land treated, quantity and formulation of herbicide used, and number of years to date herbicides have been used. An additional comment inquired about the highest number of acres the BLM has burned using prescribed fire in a year.

3.2.5.2 Alternative B - Proposed Action

Comments relating to the proposed action included questions about how treatment areas per state for each treatment are determined, whether the specific areas to be treated have been determined yet, and whether estimates of treatment area and type are flexible or rigid. One respondent wondered if the same 6 million acres would be treated each year, or if an additional 6 million acres would be treated in each subsequent year. It was also unclear whether a given area treated by different methods would count multiple times when calculating acreage (e.g., 1 acre treated 4 times = 4 acres treated). Some specific questions concerning fire management were also raised. In particular, it was unclear whether wildfires would be considered in the prescribed fire acreage. Several respondents stressed that fuels reduction treatments should be guided by sound restoration science rather than a justification for timber harvest. One respondent wondered how much total land would be treated with herbicides, while another questioned why less land than in the past was being treated with herbicides, based on the number of acres treated using herbicides as a percentage of all acres treated. Additional comments questioned why the percentage of acres treated by cultural or biological control was dropping. Changes in application methods, particularly aerial spraying, were a concern. Several comments inquired about how many acres would be treated for a given state. One respondent suggested that Alaska should treat 50,000 acres annually by prescribed fire, not 600,000. Another respondent noted that the 600,000 acres treated in Alaska includes lands in the Limited Fire Management Option. One respondent noted that Alaska does not need modification of its fire

regime. One respondent wondered why so few acres were being treated in California. A suggestion to address areas withdrawn under the Military Lands Withdrawal Act was also submitted.

3.2.5.3 Other Potential Alternatives

It was suggested that an alternative should be based on an ecosystem management approach. Various comments were received suggesting that more land should be treated. One respondent suggested expanding the EIS to cover 25 million acres. However, another respondent was concerned about the massive increase in the annual number of acres to be treated. Many respondents suggested that fuels reduction only occur where there are residential developments and significant wildfire risks. Numerous respondents called for no use of herbicides at all, limited use of herbicides, and/or choosing non-chemical alternatives. Many respondents requested including policies that require a quantitative reduction in herbicide use by the BLM over the life of the EIS, and many others noted that the ultimate goal should be to reduce or eliminate herbicide use. One respondent would like to see a deadline proposed for the end of use of herbicides by the BLM. Weighing the environmental costs of herbicides against benefits in light of alternative methods was suggested. Following the Oregon Watershed Enhancement Board's management without herbicides guidelines was recommended. Some respondents wanted to see alternatives that include each of the following: no aerial spray, no biological control, no logging, and no grazing. A couple of respondents would like to see more chemical control. One respondent recommended not using heavy equipment for treatments. A few respondents suggested developing an alternative that analyzes restoration of native vegetation to lands presently dominated by non-native vegetation. One respondent recommended not treating any native "weeds." Many comments recommended that motorized vehicles be restricted on lands to be rehabilitated or that are not already impacted. An alternative halting roadbuilding, logging, off-road vehicle (ORV) use, and other weed-spreading activities was suggested. One respondent felt that grazing permittees should submit an EIS and bond for repair of lands damaged by grazing prior to use by livestock. One respondent wanted an alternative to maintain cavity-nesting bird populations at 100 percent of potential carrying capacity to be included in the EIS.

3.2.6 Restoration Goals and Management Procedures Common to All Alternatives

3.2.6.1 Restoration Goals

A number of respondents called for the identification of weed-infested areas and the setting of restoration priorities. Criteria for prioritizing restoration areas should be stated and areas should only be restored if necessary. A few respondents recommended using both active and passive (removing harmful activities) restoration techniques. Several respondents stated that restoration efforts should be narrowly directed at restoring natural disturbance regimes and ecosystem processes, and at recovering extirpated and at-risk native species. A few respondents felt that reestablishing natural processes was important. One comment stressed that an equal amount of effort should be allocated to prevention, treatment, and restoration of ecological integrity of treated sites. Others suggested that the emphasis should be on protecting intact systems and directing funds toward potentially successful ventures. One respondent recommended using an integrated ecosystem approach to restoration, while another suggested following Andre Clewell's restoration guidelines. Numerous comments requested better management of BLM lands for multiple use and maximum public benefit. One comment suggested including forest and livestock forage enhancement in the EIS. One comment stressed the need to address regional issues and Best Management Practices (BMPs).

3.2.6.2 Planning and Management

One respondent recommended that the BLM use the best available science when developing treatment plans. Another suggested conducting an assessment of the root causes of weed expansion and the appropriate and least intrusive restoration methods, prioritizing restoration needs, and identifying the integrity of the area. Identifying the historic, current, and desired future conditions was also noted as an important consideration. One respondent raised the question of how the desired "natural condition" is determined as well as how conditions that inhibit natural recovery are identified. A few respondents felt that weed management components should be incorporated into existing land use activities rather than reducing or eliminating current uses. Several comments questioned how treatment areas are prioritized and how treatment methods to be used on a given area are selected. Areas that have been treated in the past

should be identified, and areas that have never been treated should not be treated under the EIS. One respondent suggested including a priority setting based on the Annual Work Plan General Directive. A suggestion was made that analyses should be conducted at the landscape level, then basin, then sub-basin, and then site-specific level, and that all levels should interact. Several comments stressed the importance of local control and local conditions and suggested that treatments be flexible enough to adapt to changing conditions. A few respondents emphasized that nothing should be treated until site specific analyses have been conducted. Respondents also stressed taking an inventory of weed populations prior to treatment and using this information to plan restoration treatments before they begin. One respondent suggested allowing natural processes to restore native plant communities. A number of comments addressed changing management policies for activities that spread weeds. One respondent emphasized focusing on non-structural, non-intensive management. Conducting wildlife habitat studies and improvements was also suggested. One comment inquired about what level of BMPs would be recommended.

3.2.6.3 Site Selection and Treatment Priorities

Numerous respondents suggested considering all viable treatments and using multiple treatment methods together. A few comments were received recommending that the timing and appropriateness of all restoration and treatment activities be addressed. One respondent inquired about the reasons why different areas are treated differently. Another question addressed the time frame in which the treatments were to occur. Suggestions such as using treatments most likely to restore natural processes, using site-specific treatments, and doing treatments on a watershed basis were submitted. Other suggestions included prioritizing areas for treatment based on risk and effectiveness and avoiding limiting the size of treatment applications. A large number of comments addressed the need to focus on identifying weed locations and restoration priorities. A related comment concerned the prioritization of weed species based on the degree of spread threat and hardiness. One respondent encouraged the formation of resource area weed action plans to mitigate damage to already infested areas and to prevent the spread of noxious weeds into uninfested areas. A comment was submitted encouraging the development of models to predict the species needed to restore native communities and to work with others to obtain a source for seeds. One remark stressed that alternative strategies must be site-specific, since chemical and mechanical methods affect each plant species differently. Another comment proposed that noxious weeds be prioritized, followed by invasive weeds. A couple of respondents were concerned about harmful activities in riparian zones. Inquiries about whether the EIS would recommend a particular treatment method to use or rank methods by preference were received. One suggestion proposed considering different treatments for different vegetative communities.

A number of comments were received related to fire. One suggested treating all fire class areas, not just Fire Class 3 areas. Another proposed using prescribed fire rather than mechanical treatments, while the manual removal of fuels was also suggested. One respondent noted that fire is not always appropriate. Two comments suggested considering changes in conditions when evaluating the reintroduction of natural fire regimes. One respondent advised only using fire for fuels reduction when necessary, while another felt that fire should be followed by other weed control treatments.

Numerous respondents urged that herbicides should be used only as a last resort. One respondent wanted to know the method for determining which herbicides can be used and who is responsible for making this decision. One remark noted that herbicides should not be used on native invaders where the anticipated project life is less than 25 years. Refraining from using new herbicides on large areas was encouraged. One respondent felt that herbicide use should not be unnecessarily constrained, while another proposed considering chemical control in all areas. The question of whether leasees will perform treatments was also raised.

3.2.7 Treatment Best Management Practices

3.2.7.1 Prevention

Many comments advised the need to address the causes of weed spread (see Section 3.1.1.2). Numerous respondents requested that road closure and obliteration be considered as a means of restoring ecosystem health. Several other comments focused on the minimization and mitigation of further road construction, large tree removal, and other

disruptions. One respondent noted that management activities must be altered so that the original problems do not return. A couple of comments were received urging the preservation of the natural environment. A number of comments encouraged investigating and expanding capabilities for early detection of and rapid response to invasive species. One respondent suggested promoting the conservation of areas where invasive non-natives do not currently exist. Another remark encouraged developing a strategy to preserve the ecological integrity of areas that are in good condition now. Several remarks proposed the prohibition of unnatural disturbances on intact plant communities. A couple of comments proposed managing activities that encourage invasive species spread. Some suggestions included developing a vehicle wash system and prohibiting vehicles and livestock from using sensitive areas. Decontaminating vehicles to prevent the spread of weed seeds was suggested. One remark requested that the EIS address the possibility for lands to recover without intervention if damaging uses are halted. Another suggested that the BLM should focus on managing changing ecosystems rather than treating them.

3.2.7.2 Treatment - Fire

A number of comments were submitted concerning air quality. These comments included recommendations that the BLM develop a smoke management program; take actions to minimize fire emission and/or smoke impacts; use smoke dispersion evaluation or criteria; use public notification procedures; monitor air quality; use predetermined trigger points to determine when air quality impacts occur; engage in planned coordination with adjacent and downwind land managers, and regulatory agencies; and comply with existing laws, rules, and guidance. One comment suggested eliminating fees for wood gathering and allowing citizens to gather excess fuels. A couple of respondents encouraged using green belts for fire control and using shaded fuel breaks. One remark advised against waiting for a lull in the fire suppression season to conduct prescribed burns. The mastication, mowing, or removal of excess fuels prior to using prescribed fire was recommended. Training personnel to understand fire-adapted ecosystems and training and maintaining a skilled work force for prescribed fire activities were encouraged. The need for coordination between state and local crews, as well as coordination with local fire agencies was also mentioned. One remark noted that in fire management, safety is the first priority. One respondent inquired about what would happen if fire safeguards are not followed. Another wondered what guidelines for prescribed fire would be in the EIS. A few comments advised limiting activities such as livestock grazing and ORV use in recently burned areas.

3.2.7.3 Treatment - Herbicides

A large number of respondent requested that herbicide use be limited. A couple of remarks encouraged providing strict controls to protect soil, water, and native species. One respondent was concerned about user restrictions during herbicide application. There was a suggestion that smaller plots be treated so access to large areas would not be denied to the public. Another respondent wondered how long an area would be restricted for access after a treatment. One comment addressed the method by which aquatic glyphosate formulations would be applied. One respondent advised having a comprehensive health and safety plan for workers and the public during application. One comment suggested that permittees be allowed to apply herbicides, while another comment noted that permittees are not very careful when applying herbicides.

3.2.7.4 Treatment - Cultural

Many comments suggested that grazing should be restricted on lands that are scheduled for rehabilitation or that are not already impacted. Some respondents advised allowing for a rest period after treatments. One respondent felt that grazing should be prohibited for 3 years after a burn. There were a few inquiries about the length of time that treated "active use" grazing areas would be off limits to grazing. One respondent recommended implementing action plans in conjunction with the Allotment Management Plan to ensure that rangeland health standards are maintained in all areas on all allotments. Having clear and enforced guidelines and grazing standards was suggested. A couple of respondents suggested using dehydrated molasses supplements or supplemental low moisture blocks to encourage grazing in certain treatment areas. An additional comment suggested using holistic grazing management that includes livestock and wildlife.

3.2.8 Rehabilitation and Revegetation

Many remarks urged the BLM to use native plants for revegetation. One respondent noted that native grasses are difficult to establish, and several respondents suggested that the BLM consider the use of some beneficial non-natives that are easier to establish. Another respondent remarked that native species alone are not the answer to restoration, and that a wide variety of species and unconventional tools are required instead. Continued research on native plants was proposed. Some respondents felt that rehabilitation of treated areas is critical, and that post-treatment management is key. Resting the land from management activities was suggested as a treatment method. Many comments were received stressing the importance of reseeding after treatment, especially fire. One comment noted that reseeding is often ineffective during drought. Several respondents doubted that the BLM would be able to obtain enough native seed, and others urged the BLM to expand its seed storage, availability, and mixing capabilities. Coordination with the Natural Resource Conservation Service and the U.S. Department of Agriculture for native seed was suggested. It was also noted that seed selected should be easy to establish, vigorous, and persistent. One respondent inquired as to whether crested wheatgrass or native grasses would be recommended for revegetation. Another respondent suggested planting sagebrush to encourage crested wheatgrass. Numerous respondents encouraged using only certified weed-free seed, hay, and fill dirt. One respondent remarked that the BLM purchases seed that violates state and federal laws.

3.2.9 Monitoring and Maintenance

Many comments stressed the importance of monitoring the success of treatments. Several comments proposed using performance measures and including damage thresholds to monitor success. Others inquired about how monitoring would be done, or how the natural range of variability would be incorporated into monitoring programs. Annual evaluations of project success were proposed. One comment noted that Californians for Alternatives to Toxics has won lawsuits against the U.S. Forest Service and California Department of Forestry and Fire Control for not addressing maintenance needs that arise from fuel reduction projects at the programmatic level. One respondent felt that monitoring for persistent toxins should occur before and after herbicide application, and that independent monitors (including lab analysis) should be used. Water quality monitoring was suggested, as well as transects to monitor plant diversity and cover. One suggestion promoted the implementation of standardized methods of tracking vegetative conditions. Another suggestion involved developing indicator species lists for monitoring purposes.

3.2.10 Coordination and Public Awareness

Many respondents felt that public education programs should be included in all alternatives. Numerous resondents encouraged the BLM to educate the public, as well as federal employees, about noxious weeds, fire, fuels management, endangered species, forest ecology, and natural ecological processes. Respondents also considered it important to notify land users of planned treatment areas, safety concerns, and herbicide use, and providing pertinent information in the languages of potential users. One suggestion was to post dates and locations of work on local BLM websites, and to provide maps of weed infestations to local weed management agencies. Another was to encourage users to bring weeds to local weed officials for identification. One remark encouraged the use of BMPs and providing assistance to adjacent landowners to reduce fire and weeds. Utilizing recreational user volunteers for weed control and other assistance was also proposed.

3.2.11 Special Designation Areas

Several comments suggested that different standards of management should exist in Wilderness Study Areas, Wilderness Areas, National Monuments, Inventoried Roadless Areas, and Natural Conservation Areas. Some respondents felt that such areas should not be treated, or treated only if absolutely necessary, while others felt that Special Designation Areas should be treated. One respondent suggested not using herbicides or machinery in Wilderness Areas. Another noted that it is illegal to suppress fire in Wilderness Areas. Additionally, it was recommended that wildlife habitat restoration in Wilderness Areas should only occur if required for threatened and endangered species.

3.3 AFFECTED ENVIRONMENT

3.3.1 Air Quality

Respondents suggested that the EIS contain information about the general meteorology of the project area. They suggested an identification of Class 1 areas and other smoke sensitive areas that are downwind or potentially downwind of the project area. In addition, an evaluation of all air quality laws, rules, and guidance, including General Conformity, should also be performed. One respondent suggested that smoke budgeting must be done by December. Another remark noted that only 35,000 acres can be burned in New Mexico by prescribed fire because of smoke budgeting. Recent historic and projected emissions from prescribed fire and wildland fire should be considered in estimating resource benefits. Concern was also expressed that exceeding air quality standards might halt industrial activity until standards are met.

3.3.2 Water Quality

A single comment was submitted requesting a 10-year sequential review of water quantity and quality since 1910.

3.4 ENVIRONMENTAL CONSEQUENCES

3.4.1 General

Several respondents were not clear about "cumulative effects." A question was raised as to whether the EIS will discuss situations in which different treatment methods can and cannot be used. One respondent noted that the "no action" alternative may cause further degradation. Addressing the effectiveness of various treatments, of reactive versus preventative treatments, landscape-level impacts, and the success of past treatments over time are also concerns. Several remarks suggested weighing the alternatives by resource values, not just by economics. Questions were raised about the necessity of repeated or continuous applications of treatments. Several respondents requested that impacts to private land adjacent to BLM lands be addressed. Others stated that natural disturbances should be allowed and incorporated into the EIS, and that impacts of prescribed fire as compared to natural fire should be analyzed. One respondent noted that when grazing is accompanied by active timber or forest management, fire is not a necessary tool in grazing ecosystems. Another noted that Alaska has a different kind of fuels buildup compared to other places. Recommendations were made to consider the work of Jack Cohen and Joy Belsky. Other suggestions included evaluating all the effects of fire (loss of wildlife, soil erosion, stream degradation, air pollution, and negative aesthetic) as well as the long-term effects of herbicide use. A comment was also submitted noting that the Californians for Alternatives to Toxics won a lawsuit against the U.S. Forest Service for not adequately evaluating herbicide effects.

A couple of respondents suggested analyzing fire history and fire ecology. Another encouraged gathering information on historic stand structure, forest type, aspect, elevation, precipitation, and fire regime and comparing these with current values to assess fire risks.

3.4.2 Air Quality

A couple of comments stressed the importance of addressing air pollution and smoke management. Comments indicated that the following mitigation measures should be considered in the Environmental Consequences section: estimates of air pollutants and their effects on visibility and National Air Quality Standards (NAAQS); evaluation of cumulative effects of smoke; and evaluation of the human health effects of smoke, particularly on asthmatics. There was some concern for increased dust and smoke from fire in non-attainment zones. It was also noted that regulations on emissions from prescribed burning should incorporate a long-term strategy so that the agencies have some control over the timing, amount, and path of emissions.

3.4.3 Soils

There was considerable concern that the EIS address herbicide runoff, overspray, drift, drift on wind-eroded soil, and the grasshopper effect. It was noted that burning too often will degrade soil. One respondent recommended measuring organochlorine residues in soil. One respondent recommended that the BLM minimize erosion impacts associated with treatments. Other respondents felt that disturbances to cryptogramic crusts must be eliminated, sites where the crust species are locally extinct must be reinoculated, and signs should be placed alongside trails to educate hikers about biological soil crusts.

3.4.4 Water Quality

Many comments were received concerning water quality and water issues. Some felt that important issues should be considered on a watershed basis. Respondents wanted to see issues of water pollution, water development, and conservation addressed. One respondent felt that vegetative restoration to increase infiltration and reduce runoff and erosion is important. There was also concern that treatments may cause increased sediment transport. Several respondents were concerned about grazing in riparian areas, while another suggested using low moisture blocks to supplement feed in order to keep livestock away from riparian areas. Assessing treatment effects on water yield, quality, and salt concentration was recommended. Respondents suggested restoring natural flood regimes and degraded fluvial systems. One respondent wanted to know what aquatic and riparian areas were targeted for treatment. It was suggested that water improvement projects that have negative effects on water infiltration and retention be prohibited. Another suggestion noted that active timber management has the potential to increase water flows and should be used to provide water for irrigation. Other respondents indicated that erosion and stabilization of treated areas should be addressed, and the effects of burning on watershed stability should be researched. In addition, fuels reduction in riparian zones should be scaled back and fires near rivers and streams should be immediately extinguished.

There was a considerable amount of concern from respondents regarding the negative impacts of herbicides on water quality. Numerous respondents felt that the EIS should address herbicide runoff, overspray, drift, the grasshopper effect, and the impacts and benefits of herbicide use in riparian areas. Respondents felt that the effects of decay products of herbicides in water should also be addressed. There was specific concern about the impacts of herbicide use on aquatic life, the degradation of water quality, and the risk of herbicides accumulating in hydrological systems. One respondent inquired about the method by which aquatic glyphosate formulations would be applied. Another respondent stated that non-point source pollution is an unworkable and unacceptable concept.

One respondent suggested that if timber harvest and road construction are claimed to help watershed health, then unhealthy watersheds should be identified to support this claim. There was concern about the effects of salt cedar on water quality, quantity, and riparian areas, with one respondent noting that water yield on the Mojave River has not increased since the removal of the salt cedar. One respondent proposed restoring beaver to riparian areas, while another was concerned for the species diversity in vernal pools and springs. Others felt that water for wildlife should be of good quality and quantity, and that salt loading in the Colorado and other rivers is an important issue to address. A couple of respondents noted that activities near stream channels in Utah need state authorization.

3.4.5 Vegetation

The largest number of comments submitted were related to vegetation. Numerous comments suggested that the EIS address all invasive plants, not just weeds. One respondent wished to see a breakdown of the 6 million acres into acreages of forest, shrub, and grassland. Another suggested that allowing natural succession (i.e., grassland to forest) would reduce the costs of maintaining early successional stages. It was noted that the deliberate introduction of non-native species on BLM lands is an issue to address, and that native alternatives should be considered in the future. Native invasives should be controlled, but not at the expense of wildlife. One respondent suggested that priority should be given to controlling species that directly threaten listed native species. One respondent wondered whether this program would reclaim some of the previously open range that has been taken over by forest. It was felt that using timber harvesting to improve habitat and ecosystem health should be justified. A couple of respondents advised not to

use the terms “forest health” or “rangeland health” to justify commercial timber removal. One respondent noted that millions of acres would convert back to native plant communities if the disturbance factors were removed. There was concern about introduced revegetation species invading rare plant habitat. There was one inquiry about what treatment methods are being considered for woodlands. There was also concern about the impacts of treatments on vegetation used for subsistence. One respondent proposed focusing on minimizing the spread of existing weed infestations, while others wanted to ensure that weed control measures do not result in more ecological disturbances than the weeds themselves. Evaluating the potential for new weed outbreaks was suggested. It was also noted that some natives may become invasive as other species are eliminated. One respondent requested disclosing “forest health restoration” measures. Another suggested that remaining areas of high quality habitat be analyzed.

There were a number of comments relating to the interactions between fire and vegetation. Numerous comments pointed out that fire encourages weed growth, and that the invasion of fire-adapted exotic species to the disadvantage of native species is a concern. It was noted that fire is often not desirable in rangeland ecosystems. Another comment noted that burning often brings minerals to the soil, encourages growth, and improves watershed health. Using fire after timber removal to encourage grass growth was recommended, as was following prescribed burning with other weed control treatments. Other statements were that crested wheatgrass protects areas from fire, that fire can help plants used to make baskets, and that fire can encourage desirable vegetation and improve habitat. One respondent suggested using prescribed fire for cheatgrass control. It was also suggested that there should be science-based silvicultural treatments of fuel-ladder thickets in ponderosa pine forests.

Respondents stated that grazing can be used to reduce hazardous fuels and feed livestock, and that hazardous fuels can also be reduced by irrigation and by harvesting grasses and forbs for winter livestock feeding. One respondent inquired about whether there are size and species limits on live vegetation removal. Another proposed addressing biomass removal for fuels reduction. Several respondents questioned why prescribed fire is proposed when some weeds thrive on fire. However, it was also noted that burning cheatgrass and Junegrass at the proper time kills their seeds.

A large number of comments recommended evaluating the impact of herbicides on other plant and animal species within the areas considered for treatment. Using vegetative management strategies that minimize the adverse environmental effects of herbicides was recommended. Several comments called for the EIS to address the impacts of new-generation, high-potency pesticides on non-target plants. Respondents felt that Imazapyr herbicide should be considered for foliar spraying of large pest trees where chainsaw use is restricted. There was some concern about weeds becoming herbicide resistant, and about how the BLM would prevent the death of beneficial native plants from herbicides.

One respondent remarked that mechanical treatments and logging cause weed spread and erosion, and increase fire risk and forest health concerns. There was some concern for vegetation and wildlife disruption and soil compaction and destabilization from mechanical treatments. One respondent wondered if commercial logging would be used as a tool. Others noted that logging does not reduce fire risk in wild stands and that fire salvage logging does not restore site ecology. It was also felt that secondary benefits that might come from timber harvest should not be used as an excuse to harvest. One respondent proposed increasing timber harvest. Others noted that logged areas have higher fire risk. It was suggested that the benefits of unlogged areas be analyzed and that old growth stands not be logged.

Some concern was expressed about harm to desired species from biological control agents. Another respondent suggested that the BLM not convert natural climax vegetation to something more desired by ranchers. One respondent stated that areas treated to improve vegetation composition or density must be protected from disturbances such as grazing. A couple of respondents inquired about how rangeland cheatgrass would be controlled, while another respondent noted that short term intensive grazing by sheep can control cheatgrass. Short-term intensive grazing of cattle was also recommended as a treatment method, and it was also suggested that grazing should be addressed as a tool to reduce fuel loads and weeds. One respondent noted that correct animal control improves forage. Another suggested that livestock management should favor native species. One respondent felt that sheep grazing is better than mechanical or chemical control. Other respondents suggested considering “restorative” grazing. Some respondents felt that excessive grazing which results in a decline of range condition should be prohibited. To improve sage grouse habitat, one respondent recommended that instead of burning sagebrush, strips of vegetation should be treated with

herbicides, then allowing cattle to break the vegetation down, followed by planting with grass. Some respondents felt that cheatgrass should be replaced with native bunchgrass perennials, not crested wheatgrass and other non-natives. Another respondent, however, felt that crested wheatgrass should be used to compete with cheatgrass when appropriate. One respondent inquired about what would be used to replace cheatgrass and suggested that prostate koshia could overtake cheatgrass.

Several comments suggested that specific analysis of issues concerning the maintenance and restoration of high quality sagebrush habitats be included in the EIS. The loss of aspen clones was also an issue to be addressed. A few respondents pointed out that not all introduced species are bad. There was some concern about the spread and increased density of pinyon-juniper woodlands. One comment recommended thinning the pinyon-juniper overstory so the understory could develop. Another encouraged the eradication of tamarisk and restoration of cottonwoods along rivers. It was also noted that the control of salt cedar must be gradual and low impact because it provides important habitat for wildlife species that use riparian habitats. Several respondents felt that Medusa-head, Mediterranean sage, African rue, and big sage should be included and considered in the EIS. One respondent noted that yellow star thistle grows better after fire. Another reported that elk eat knapweed seed heads and spread the seeds. One respondent criticized the lack of aggressiveness in treating perennial pepperweed in the Warner wetlands, while another questioned whether reed canarygrass would be controlled. One respondent felt that habitat restoration for threatened and endangered species should be a priority. Another recommended avoiding the listing of new plants on the Endangered Species List. Analyzing the impacts of using certified versus non-certified weed-free seed, hay, and straw was suggested.

Developing a list of invasive plants that includes species of both state and local concern was recommended. Several respondents felt that if state listed weeds are not consistent with BLM target species, then these discrepancies should be addressed. One respondent recommended allowing more plants to be added to the weed list. Others suggested adding European beach grass, Medusa-head, and Mediterranean sage. Other respondents noted that weed control information can be obtained from the California Exotic Pest Plant Council. One respondent inquired about whether cheatgrass was listed in Nevada as noxious.

3.4.6 Fish and Wildlife

One respondent requested that water with fish and water without fish be differentiated. An additional comment suggested acknowledging and addressing specific sites that have high fish value. One respondent suggested that the BLM protect fish using wetlands and vernal pools. There was some concern about herbicide bioaccumulation in fish and wildlife. Some respondents felt that the BLM should manage for biodiversity and identify specific sites that have high wildlife value, and consider the cumulative impacts of treatments on wildlife. Other respondents wanted the EIS to address the habitat requirements of different wildlife species and the ways in which vegetation treatments will influence these habitats. Considering treatment effects to ground-nesting birds and other non-target species was also mentioned as an important issue to consider. It was noted that burning may remove desirable habitat, and projecting biodiversity before and after fire was suggested. Some respondents felt that spring burning would harm wildlife, and that it is not consistent with natural fire regimes. Some concern was expressed that firelines might be used as vehicle routes and cause degradation of vegetation and wildlife habitat.

Numerous comments also promoted the idea that wildlife habitat improvement efforts should be directed at restoring habitat and natural ecological processes. One respondent recommended that the BLM protect wetlands and vernal pools used by wildlife. Several respondents suggested that the role of keystone species, such as the prairie dog, pronghorn antelope, and bison, are important considerations, and that State special status species and threatened and endangered species should be protected. A couple of respondents felt that responsibilities for improving wildlife habitat should not be deferred to state wildlife agencies. It was also suggested that subsistence species for rural Alaskans should be considered special status species. Respondents were also concerned about the impacts of treatments on habitat of wildlife used for subsistence (e.g., reindeer, fish, etc.).

The protection of sage grouse and their habitat was advised, and one respondent wondered how the EIS would change if the sage grouse were listed. It was noted that carefully applied herbicides may improve sage grouse habitat. Comments also suggested that the impacts to spotted owl habitat should also be identified and addressed. It was noted that the maintenance of early-successional deciduous vegetation and a mosaic of vegetation types is important for most wildlife in interior Alaska. One respondent suggested that the treatment of critical habitat areas would force wildlife to other areas, and wondered whether the BLM would also manage those areas. One respondent noted that aggressive tamarisk removal efforts in the Mojave River have killed wildlife in the past. Respondents also felt that impacts of treatments on soil and litter organisms, insects, and snag habitat should also be analyzed. Other respondents felt that salamanders and red tree voles should be surveyed and managed according to the Northwest Forest Plan. There was concern that cherry oak is being removed to increase grass production for cattle, but that this is destroying wildlife habitat. One respondent recommended that the BLM avoid impacts to agricultural crops used by wildlife.

3.4.7 Species of Concern

Numerous comments encouraged the BLM to use this EIS process as an opportunity for the recovery of the full range of native species and ecosystems across the western states, including species such as the sage grouse, white-tailed and black-tailed prairie dogs, black-footed ferret, Columbia spotted frog, Washington ground squirrel, desert yellowhead, and wolves. One respondent recommended that specific directions for biological assessments of state special status species and threatened and endangered species should be provided in the EIS. Another respondent questioned how Habitat Conservation Plans and the Endangered Species Act would be tied into the EIS. It was also suggested that any decisions concerning threatened and endangered species should be peer reviewed. One respondent remarked that a single EIS addressing all special status species in the Western states would lack the depth of analysis to be credible.

3.4.8 Livestock

Some comments suggested that the dangers to livestock from noxious weeds needs to be addressed. One respondent inquired about how livestock grazing would be prevented on areas treated with Picloram. It was suggested that the BLM provide alternative grazing areas if livestock are displaced for vegetation treatment.

3.4.9 Wilderness Areas

A few respondents proposed that the role of areas of critical concern in conserving at-risk, rare/threatened plants and wildlife, and unique communities and habitats should be addressed. The Wilderness Act's mandate that any actions that generally compromise wilderness character must first be subjected to a "minimum requirements analysis" should be discussed. Adapting the Carhart Model for minimum requirements analysis was proposed. Some respondents suggested that weeds should be stopped from spreading into Wilderness Areas by treating them outside of these areas. Other respondents proposed that unique natural areas including riparian zones, roadless areas, old growth areas, and areas of highest biological integrity should be protected and that roadless areas should not be treated.

3.4.10 Rights-of-Way

Respondents indicated that prescribed burns should not be conducted in utility rights-of-way for safety reasons, that safety is an important consideration in rights-of-way, and that the National Electric Safety Code should be utilized when developing treatments.

3.4.11 Oil, Gas, and Mineral Development

Some respondents felt that the impacts from fluid mineral activities should be included in the EIS. Concern for the influx of noxious weeds near coal-bed methane sites was expressed. Another respondent recommended that the BLM should monitor and treat noxious weed invasions caused by coal bed methane since it is regulated by the BLM. One respondent wondered whether oil and gas operations would be restricted in an area that has been treated. Another respondent suggested that pipelines and oil and gas developers must revegetate and monitor sites.

3.4.12 Cultural Resources

Some respondents felt that cultural preservation is an important issue and encouraged addressing the impacts to cultural and archaeological sites. Other respondents suggested that traditional cultural properties should be properly safeguarded, and treatments should be completed in a way that is sensitive to cultural resources. Some respondents wanted the impacts of treatments on basket plants to be considered. Respondents noted that fire generally helps these plants, while herbicides are detrimental. One respondent requested that the BLM evaluate the cumulative impacts of burning near Alaska Native villages.

3.4.13 Recreation

Several respondents remarked that the needs of motorized recreationalists must be adequately considered and that the impacts of treatments on recreational uses and enjoyment of public lands should be addressed. Other respondents remarked that treatments should not be used as an excuse to close ORV trails. Another comment requested that areas not be treated solely to improve recreational use. If any travel or access routes will be closed, the impacts on recreation and nearby areas that will handle the shift in use should be addressed. The effects of herbicides on recreational users should also be addressed.

3.4.14 Risk Assessment

A large number of respondents were concerned about the risks to human health from treatments. Some respondents felt that both human and ecological risk should be addressed for all alternatives. Respondents suggested that at-risk groups like infants, elderly, sick people, and people with sensitivities to chemicals and smoke be specifically addressed. A number of comments proposed that risk assessments be performed for both prescribed and natural fires. One respondent felt that public land health should not be compromised for the sake of reducing fuel loads. Numerous respondents urged the BLM to describe all potential toxicological hazards of herbicides, including their ability to disrupt hormone systems and immune systems. It was noted that herbicides may have long-term effects on non-target species. One respondent wondered whether any of the potential herbicides are safe for household use. According to several respondents, sublethal effects of herbicides, surfactants, and emulsifiers should also be considered. Several respondents suggested using existing herbicide risk data. Another noted that if there are insufficient risk data to be found, then an herbicide should not be used. There was concern for the effects of herbicides on basket plants and the people who collect them. Health effects of herbicides on Native Americans was also a concern.

A number of respondents questioned how herbicides would be evaluated, particularly new herbicides, and who would evaluate them. Using independent, non-biased researchers to do herbicide research was recommended. Another comment suggested establishing a technical advisory committee to aid BLM personnel in making wise decisions about herbicide use. The interdisciplinary team should include someone with a thorough knowledge of the potential toxicity of herbicides, and evaluations of herbicides should be based on scientific data. The question of whether previously completed herbicide risk assessments were still adequate and valid was raised. Some respondents also felt that herbicides currently used, and those proposed for future use, should be thoroughly described and uncertainties regarding the environmental effects of herbicides should be disclosed. One respondent wondered how the BLM's herbicide assessment would differ from the EPA's. Another respondent wondered whether the BLM herbicide studies could be used for labeling. Establishing a goal of using the minimum effective dosage and developing protocols for achieving this was encouraged. According to some respondents, Oust should be considered for evaluation. One respondent questioned whether Oust would be a preferred treatment, and whether a new risk assessment would be completed for Oust.

3.4.15 Socioeconomics

Respondents felt that the economic impacts of BLM activities on local communities and residents should be considered, including all economic and ecological costs and benefits. Other respondents suggested that the BLM address its needs for personnel and fiscal resources, and how the designated work would be done. Some respondents

suggested addressing the costs to state, county, and private individuals associated with the secondary effects of logging, including road repair, lost business to alternative fiber industry, and lost recreational use area. Several respondents proposed that the socioeconomic benefits of using cultural control instead of other treatments needs to be addressed, and that environmental justice and Indian Trust issues should also be discussed. A number of comments addressed the potential economic effects to ranchers if their grazing areas are changed or access denied. According to some respondents, decreasing property values near treated areas should also be addressed. One respondent noted that areas grazed for treatment should not count against Animal Unit Months (AUMs). Another respondent wondered whether grazing permittees would pay for some of the treatment costs. Some respondents proposed including the projected cost per acre for each treatment method as well as for revegetation and recommended that fuels should not be sold as biomass or commercial timber. One respondent suggested using firefighters in the off-season or during slow periods to reseed fire-damaged lands, while another suggested that the BLM use Native American firefighters to conduct prescribed burns. Respondents suggested that volunteers from native plant societies and other groups could also be used to help propagate and collect native seed. Other respondents suggested using volunteers or prisoners for weed treatment and monitoring. A few respondents wondered whether the BLM would perform the treatments or contract them out, while others suggested contracting to local vendors. A couple of comments were concerned about economic inpacts to local firefighters. One respondent suggested paying U.S. citizens to hand pull weeds rather than spending money on herbicides. Another questioned whether the BLM has adequate personnel to do more mechanical treatments. Respondents also suggested considering high or inflated seed prices and estimates of annual seed usage when evaluating vegetation treatments.

3.5 OTHER ISSUES

3.5.1 Terms

Respondents felt that euphemistic terms should not be used in the EIS, and that the following terms should be clearly defined: native vegetation, restoration, ecosystem processes, fire-adapted ecosystem, wildland-urban interface zone, noxious, invasive, non-native, weed, and sensitive species. A couple of respondents suggested using the National Invasive Plant Council's definition of an invasive weed. Another respondent wondered whether the BLM considers all non-native species to be invasive.

3.5.2 Document Production

One respondent suggested that all maps (e.g., land allocations, road and stream networks, proposed roads, land use history, fire history) should be represented at a consistent scale for easy comparison. Another suggestion proposed that the activities described in the EIS should be divided into two parts: restoration and prevention. One respondent encouraged writing in non-ambiguous, easy to understand language.

3.6 ISSUES NOT CONSIDERED IN THE EIS

The BLM EIS core team met in early April, and again in late April, to review public comments and determine which comments would be addressed in the EIS. The following are comments that the team decided should not be addressed in the EIS.

Comments were rejected from further analysis for several reasons. In many cases, comments were of general nature and did not lend themselves to analysis (e.g., respondent agrees that BLM should prepare an EIS), or gave the respondent's opinion on BLM or government operations and activities. A large number of comments dealt with issues that were best addressed at the local level, rather than in a programmatic EIS covering issues of concern to the western U.S., including Alaska.

Several comments dealt with issues or concerns unrelated to the project purpose and need, which is to manage vegetation in the western U.S., including Alaska, or dealt with issues that have already been covered in other NEPA documents. For example, the EIS will not focus on the causes of land degradation, except in the context of how it may

influence the impacts of vegetation management activities. The focus of this EIS is on vegetation treatments to maintain and restore land health, rather than on ways to eliminate causes, especially if the causes of land degradation are associated with activities allowed under Federal Land Management and Policy Act (FLMPA), such as oil and gas development and grazing.

As discussed at the scoping meetings, this EIS will not address vegetation management that is primarily focused on commercial timber or other forest product enhancement or use, livestock forage enhancement or use, abandoned mine land reclamation, or energy production. This EIS will not analyze fire suppression operations and soil stabilization, except where related to vegetation treatments. This EIS also will not evaluate policies and programs associated with land use activities authorized by the BLM, such as livestock grazing, off-highway vehicle use, and timber harvesting, and will not make land use allocations. Thus, comments that dealt with these issues will not be evaluated in the EIS.

3.6.1 Proposed Action and Need

A number of respondents felt that the EIS is too broad in scope. One respondent remarked that fire and invasive plant management should be evaluated in two separate EISs. Whether the project schedule was realistic was questioned. Another respondent wondered if there was a push at the local level to start working on these treatments. One respondent remarked that analysis is not necessary, but that action is.

A number of comments recommended addressing the impacts of livestock grazing on the following issues: the spread of disease vectors; noxious weeds and other invasive species; fire frequency and altered fire regimes; riparian habitats, wetlands, springs, and watershed health; aquifer recharge; composition and vigor of native vegetation; pinyon-juniper ecosystems; the health of native fisheries; wildlife habitat; soil erosion, compaction, and loss of microbiotic crusts; native biodiversity; non-game species, including predator populations; and the health of the recreational public.

3.6.2 Scope of Analysis and Decisions to be Made

Some comments suggested that no changes be made to existing EISs that deal with timber and livestock forage. One remark questioned whether the EIS will list things that cannot be done. A couple of respondents wondered how grazing could be excluded from the EIS. Another question raised was whether a new EIS would be required if the BLM wants to treat more land in the future. It was suggested that information that is unknown or unavailable be fully disclosed. One respondent suggested that banning the causes of disturbance (e.g., livestock, ORVs, etc.) must be tried as the first alternative. Several respondents proposed commissioning an independent scientific analysis of the causes of weed spread on BLM land.

3.6.3 Relationship to Statutes, Regulations, and Policies

One respondent felt that the project does not comply with federal regulations. Evaluating potential legal blocks was suggested. One remark recommended expediting the environmental assessment process so that plans could be implemented sooner. Another respondent wondered what would happen if there was a delay due to a lawsuit. Choosing the “no action” alternative if insufficient supporting scientific data is available was suggested. Another suggestion proposed using categorical exclusion to allow for treatment of lands prior to EIS completion to protect the public and wildlife. Respondents felt that noxious weeds should be classified as a “non-appealable categorical exclusion” and treated immediately. One respondent felt that Alaska should have its own EIS since it is so different than the other western states. Another felt that Alaska would be well served by a Department of Interior integrated EIS. Some respondents felt that NEPA procedures should be streamlined and that emergency response without NEPA analysis should be allowed. An annual review of the EIS was also recommended.

3.6.4 Policy

A few respondents recommended changing and adapting policy and management plans if they are not working. One respondent noted that the BLM does not have the responsibility to treat Native lands in Alaska and should not treat them. Another suggestion was that the BLM should consider whether policies that favor logging, grazing, and mining

serve the broader public interests of Americans. A couple of respondents inquired about whether the World Trade Organization, North America Free Trade Agreement, and other trade agreements and state and federal laws facilitate new weed outbreaks and how they may be prevented. Some respondents proposed amending the Mining Act of 1872 to charge royalties and make mines practice sound environmental stewardship, or repealing the Act. There was concern that the public should have access to public lands through private lands. Some respondents advised against constructing new roads, increasing vehicle or machinery use, and increasing livestock access. Trading BLM lands for development rights to lands in wildlife migration routes was proposed. One respondent felt that the EIS should provide recommendations, not policy.

3.6.5 Interrelationships and Cooperating Agencies

A few respondents proposed that BLM offices should work more independently. It was also proposed that the EIS include language for district rangers on what local governments and tribes are entitled to. One respondent inquired as to whether the Forest Service was doing a similar EIS. There was some concern that a lack of cooperation by adjacent private landowners would hamper project success. Respondents also recommended coordinating with the Navajo Nation to repair earth dams, and that rules between different agencies should be standardized.

Respondents felt that treatments that damage natural resources should not be used. One respondent inquired about the time frame for project-level plans. Another respondent remarked that since the conditions in Alaska vary from those in other states, the proposed actions may be detrimental to Alaska. It was advised that there should be water for Walker Lake. The question of whether the EIS will address local tamarisk problems was raised. Respondents suggested providing detailed information about the location and areas to be treated. There was some concern that input into the EIS would supercede previous local rural input and would therefore diffuse the input of local citizens. Some respondents felt that citizens also need to know who to work with locally. There was some criticism that this EIS does not address local conditions and is only top-down management. Respondents proposed that the boundaries of treated areas be marked and local governments be given control. Some respondents also recommended that forage allocations be stated so that some is left for wildlife and to improve plant vigor. One respondent recommended obtaining consent from members of the public that may be affected by treatment programs, and noted that the Oregon BLM was sued for failure to notify the affected public about treatment activities.

3.6.6 Public Involvement, Scoping, and Issues

One respondent wondered whether treatment methods would be analyzed during scoping meetings. Some suggested having public scoping meetings in each district and in each large city in Nevada, having public meetings in rural areas, as well as having meetings on evenings or weekends. Respondents asked for public notices to be put in a section of the paper that many people read, and felt that comments from the west should be weighed more heavily. There was some concern that information could not be reviewed by the public prior to public meetings. Several persons requested that the comment deadline be extended. A respondent inquired about whether the meeting transcripts would be available for public review. One respondent was concerned that a non-government contractor was sending electronic mail notices to the public regarding the scoping meeting dates and locations.

3.6.7 Funding

One respondent was against BLM money going to non-profit groups. Another respondent recommended that more employees are needed to complete the BLM's duties.

3.6.8 Management and Treatments

One respondent encouraged that the BLM should not manage for single issues.

3.6.8.1 Fire

One respondent remarked that fire management should be a separate NEPA process. There was concern that overly restrictive regulations for prescribed fire emissions would curtail programs needed to rejuvenate wildlife habitat. One respondent was against fire and wondered if the BLM could require adjacent landowners to protect their own property from fire. Addressing the impacts from compounds used to start fires was recommended. Allowing livestock permit holders and private owners to burn was also proposed. One respondent suggested creating Fire Management Plans for every burnable acre. Numerous respondents suggested that there must be parallel commitment by private landowners to reduce fuel burdens on their properties. There was some concern that environmental groups would oppose the clearing of dead materials. A number of comments advised that fuels reduction close to (i.e., within 40 meters of) a structure is more effective than landscape-wide thinning in the wildland-urban interface. Harvesting fuels for the production of energy in a cogeneration plant was suggested. One respondent advised excluding cattle before and after fire. Another respondent recommended reviewing the Intermountain Fire Sciences Lab's fuel management videos. One respondent felt that the EIS is a means to justify wasting federal fire funds on destructive projects. Another wanted to learn more about hazardous fuels reduction activities on public lands.

3.6.8.2 Herbicides

Numerous respondents proposed including a complete evaluation of all herbicide ingredients (i.e., not just active ingredients) in products proposed for use. One respondent wondered whether there were any new restrictions on chemicals since September 11, 2001. Whether the BLM herbicide studies can be used for labeling was questioned. Several respondents inquired as to whether the BLM will test and determine which pesticides are effective as part of the EIS. Completing a cost-benefit analysis of herbicides was recommended. One respondent wondered if the BLM will work to get herbicides that have the potential for wildland use labeled for such use. Some respondents indicated their support for chemical control. Clarifying what "modern" herbicides are was suggested. A couple of comments were received asking the BLM to update its DuPont crop protection list and Cornbelt Chemical/Van Diest Supply Company product portfolio. One respondent suggested considering Olympus herbicide to control brome species. One respondent questioned whether the general public is opposed to any kind of herbicide use.

3.6.9 Revegetation

One respondent encouraged concentrating on restoring riparian areas first, then upland areas. One person suggested that the BLM only control juniper where it occupies greater than 25 percent of the landscape, since it increases landscape diversity. One recommendation called for prescribing a standard framework for uniform implementation of vegetative treatments. Using genetic engineering to develop new plants was encouraged, and whether the BLM is funding the development of more competitive plants was questioned. It was noted that Idaho is developing new species like prostate koshia. One respondent proposed analyzing the effects of land uses on vegetation and developing BMPs for each land use. One permit holder requested that crested wheatgrass be planted in his area. Landscaping roads with natives was also recommended.

3.6.10 Coordination and Education

One comment proposed that the BLM establish minimum core standards of formal weed science training for its resource managers.

3.6.11 Effects on Vegetation

One respondent felt that vegetation on BLM and adjacent lands should be compared and old growth stands should be identified. Many commentators felt that the effects of livestock grazing on native plant populations should be addressed in the EIS, including how it relates to the amount of treatment required.

3.6.12 Effects on Fish and Wildlife

Several respondents requested that predator control activities not be conducted on BLM lands. Some respondents felt that federal and state programs of stocking exotic game or fish species should be ended. One respondent suggested creating water developments for wildlife, and that the designation of critical habitat should be addressed in the EIS. A few respondents requested the restoration of beaver, prairie dog, and black-footed ferret populations. One respondent noted that endangered species should really be endangered, based on scientific data. Respondents also felt that species viability benchmarks should also be incorporated into vegetation treatments. One respondent requested that the BLM evaluate the impacts of ORV use on wildlife. Another was concerned about the misuse of lynx hair samples during laboratory testing of hair samples collected in the Pacific Northwest.

3.6.13 Effects on Wild Horses and Burros

A couple of respondents remarked that the environmental impacts of domestic livestock should be compared with that of wild horses and burros, while another remarked that wild horses and burros have less negative impact than livestock. Allocating more money for wild horses and greater control of the herds was encouraged. A suggestion that wild horses be classified as big game for sportsmen was made. There was also some sentiment that wild free-roaming horses and burros should be protected as stated in the Wild Free-Roaming Horse and Burro Act of 1971.

3.6.14 Effects on Livestock

There was some concern about overgrazing abuses on public lands, including a call to remove cows from public lands. However, another respondent encouraged expanding the grazing program. Respondents proposed that unneeded stock tanks, water diversions, and dams be removed. A few respondents proposed establishing a maximum level of livestock grazing based on native ecosystem viability for each alternative and including a cost-benefit analysis for maintaining any level of grazing. The concepts of "forest health" or "rangeland health" should not be used as an aegis to continue livestock grazing. One respondent requested that Allan Savory's rangeland management ideas not be followed. Some suggestions called for the phasing out of livestock grazing wherever practical, especially on marginal lands and in sensitive areas. One respondent suggested that grazing regulations need to be improved to prevent overgrazing, while another comment suggested that grazing regulations be changed so ranchers can better control weeds. Electronic cattle training was suggested as a method worthy of consideration. One respondent proposed that grazing fees be increased. Respondents felt that reducing sheep grazing is costly and funds should be established for sheep grazing programs to control weeds. It was noted that weed control activities may indirectly help grazers. Areas where grazing is not economically or ecologically sound should be inventoried. One respondent suggested that ranchers should be allowed to manage grazing themselves. Some respondents proposed that livestock access be reduced proportionately to the reduction of wild horses and burros. The alternative land uses that no longer take place in areas where grazing now occurs should be analyzed, and the benefits (i.e., economic, ecological, aesthetic) of ending grazing should be assessed.

3.6.15 Effects on Wilderness Areas

There was some concern about the loss of wilderness in managed landscapes. The allocation of more money and personnel to take care of established Wilderness Areas was recommended, but others encouraged the BLM to de-list Wilderness Study Areas. A couple of respondents noted that roadless areas are important for plants and wildlife.

3.6.16 Effects on Oil, Gas, and Mineral Development

One respondent suggested that oil and gas leasing by the BLM should be halted to slow the pace of global warming and to avoid the immediate degrading impacts on natural ecosystems. There were suggestions that oil, gas, and coal gas sales on BLM lands be reduced. Adopting stricter regulations and enforcement for restoration and revegetation of mineral leases after a definite period in non-use was proposed. There was also some concern about reclamation of mineral and energy production sites. One respondent was concerned that the BLM would not take the interests of the oil and gas industry into account when making vegetation treatment decisions.

3.6.17 Effects on Recreation

Respondents felt that the BLM's policies and practices should reflect the shift in the economy from one based on extractive industries to one based on recreation. It was suggested that any strategy developed in the EIS must keep public lands open to the majority of the public for motorized recreation. One respondent proposed that ORVs have license plates and that they be required to stay on marked trails, and that the public given an 800 number to call to report abuses by ORV users. Concern was expressed about the "massive influx" of recreational users. Several respondents suggested that vehicles only be allowed in designated areas with monitoring and enforcement. Numerous comments were submitted encouraging the BLM to restrict or eliminate motorized vehicles in proposed Wilderness Areas, inventoried roadless areas, and in Wilderness Study Areas. An additional comment requested that motorized vehicles be removed from BLM lands altogether, unless they can be restricted to small areas where weeds can be contained. Others proposed increasing the penalties for violators of ORV rules. One respondent requested that no new Wilderness Areas be designated, as ORV users are not allowed to use these areas. Another respondent suggested only allowing ORVs on weed-infested lands, since driving over weeds will kill them. Getting funding from recreational groups was recommended. It was also felt that wildcrafters (harvesters) are harvesting too many plants and disturbing the ecosystem. One respondent also requested that ORV use not be evaluated in the EIS.

3.6.18 Effects on Cultural Resources

One respondent recommended that a project should not be held up if a few minor artifacts are found.

3.6.19 Effects on Risk Assessment

Several comments were submitted that recommended evaluating all new experimental treatments, not just herbicides.

3.6.20 Effects on Socioeconomics

A number of comments suggested completing a cost-benefit analysis of all treatments.

3.6.21 Anti Government

Respondents expressed concern that the 10 state zoning law is contrary to the intent of the founding generation. There was also an opinion that the Federal Government's stewardship of land is worse than that of private management. Numerous comments called for taking no action on or blocking the implementation of the desertification treaty. Several respondents noted a lack of trust in the government and felt that this project is a resource/land grab by the government. Many respondents requested that private property rights and no net loss of private property should be considered. It was suggested that the issues be addressed without locking up the land or creating ineffective and expensive programs, while avoiding top-down micromanagement strategies. A few respondents recommended that industry not be allowed to control government or the BLM, while another respondent remarked that the BLM is unconstitutional and must not be in control of anything. Some respondents criticized the poor management of lands by the BLM in the past, indicating that it has caused the current problems.

3.6.22 Document Production

One respondent wondered why a contractor was preparing the EIS. A number of comments were received relating to mapping. Respondents also felt that maps should allow for site-specific analysis and include every road and trail, and that they show the degree to which noxious weed invasions are connected to roads, mining, grazing, logging, and other activities. In addition, respondents stated that areas with weed infestations and areas free of pests should also be mapped, and that water bodies and aquatic areas should be mapped and protected, particularly those in project areas. One respondent wondered whether a large Geographic Information Systems (GIS) product associated with this project would be available on CD or on the Internet.

3.6.23 General Comments

Numerous comments expressed concern about the environmental movement. Many comments requested that access issues be addressed and called for public lands to be kept open for everyone. One respondent wondered whether it was possible for the land to continue to be productive, while at the same time enacting management practices. It was recommended that forest policy be changed to reflect public interest. One respondent noted that Alaska does have weeds. Another comment questioned whether Dow Chemical Company could help fund this project. There was an inquiry about what BLM team specialists are located in Montana. Respondents also felt that the cumulative impacts of nuclear and other weapons testing should be considered in the EIS. Another respondent inquired about how much BLM land in California is desert compared to wetlands. One respondent shared their support for the EIS.