

Appendix N: Comments and Responses



Appendix N: Comments and Responses
Section 1: Agency Letters and Responses

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

June 20, 2003

David Cooper, NCA Manager
Bureau of Land Management
Winnemucca Field Office
5100 E. Winnemucca Blvd.
Winnemucca, NV 89445-2921



Subject: Draft Environmental Impact Statement (DEIS) for Black Rock Desert/High Rock Canyon Emigrant Trails National Conservation Area (NCA) [CEQ #030096]

Rating: Lack of Objections (LO)

Dear Mr. Cooper:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

The DEIS analyzes several options for managing resources and visitation in the Black Rock Desert/High Rock Canyon Emigrant Trails National Conservation Area (NCA). Alternative B (Emphasis on Response to Change) has been identified as the preferred alternative. In our view, the preferred alternative reflects a sincere effort to improve recreational opportunities and moderate environmental impacts and potential user conflicts associated with increased use of the NCA. In general terms, we found the DEIS to be both thorough and well-written. Our review revealed no significant concerns with the preferred alternative.

For these reasons, we have rated the preferred alternative as Lack of Objections (LO). EPA's rating and a summary of our comments will be published in the *Federal Register*. Please see the enclosed Rating Factor for a description of EPA's rating system.

We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CMD-2). If you have any questions, please contact me or Leonidas Payne, the lead reviewer for this project. Leonidas can be reached at 415-972-3847 or payne.leonidas@epa.gov.

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office

Enclosure:
Summary of EPA Rating Definitions

Thank you for your comments. BLM's NCA Planning Team worked diligently to strike a balance between resource conservation and recreational use in the Proposed Plan for the NCA.

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MAY-28-2003 10:19

NEVADA STATE CLEARINGHOUSE

Department of Administration
 Budget and Planning Division
 209 East Musser Street., Room 200
 Carson City, Nevada 89701-4298
 (775) 684-0209
 Fax (775) 684-0260

RECEIVED

APR 13 2003

DEPARTMENT OF ADMINISTRATION
 CHIEF OF THE DIVISION
 BUDGET AND PLANNING DIVISION

DATE: March 13, 2003

Governor's Office	Legislative Counsel Bureau	Conservation-Natural Resources
Agency for Nuclear Projects	Information Technology	Director's Office
Energy	Emp. Training & Rehab Research Div.	State Lands
Agriculture	PUC	Environmental Protection
Business & Industry	Transportation	Forestry - cover only
Minerals - cover only	UNR Bureau of Mines - cover only	Wildlife
Economic Development - cover only	UNR Library	Region 1
Tourism	UNLV Library	Region 2
Fire Marshal	Historic Preservation	Region 3
Human Resources	Emergency Management	Conservation Districts
Aging Services	Office of the Attorney General	State Parks
Health Division	Washington Office	Water Resources
Indian Commission - cover only	Nevada Assoc. of Counties	Natural Heritage
Colorado River Commission	Nevada League of Cities	Wild Horse Commission - cover only

Nevada SAI # E2003-105
 Project: DEIS & RMP for the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area



CLEARINGHOUSE NOTES:
 Enclosed, for your review and comment, is a copy of the above mentioned project. Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than **April 17, 2003**. Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference. Questions? Heather Elliott, 684-0209.

THIS SECTION TO BE COMPLETED BY REVIEW AGENCY:

<input type="checkbox"/> No comment on this project	<input type="checkbox"/> Conference desired (See below)
<input type="checkbox"/> Proposal supported as written	<input type="checkbox"/> Conditional support (See below)
<input checked="" type="checkbox"/> Additional information below	<input type="checkbox"/> Disapproval (Explain below)

AGENCY COMMENTS:

The plan may not exclude holders of a valid water right issued pursuant to Nevada Revised Statutes (NRS) chapters 533 and 534 from accessing, maintaining or improving permitted points of diversion or water conveyance facilities. The plan may not exclude owners of dams from accessing, maintaining, improving or removing recognized structures pursuant to NRS chapter 535. **All** water improvements must be permitted pursuant to NRS chapters 533 and 534 and possibly chapter 535. **All** abandoned or deficient wells on public property must be plugged in conformance with Nevada Administrative Code (NAC) and NRS chapters 534.

Signature: Michael J. Anderson P.E. Agency: DWR Date: April 2, 2003

The enabling legislation that created the NCA and associated Wilderness Areas explicitly recognized and protected all valid existing rights that occurred in these areas. Therefore, the exclusion of access or maintenance associated with a valid existing right is not contemplated by any of the planning decisions within this Resource Management Plan. Appendix A was modified to clearly state that resource uses and activities shall be allowed to continue subject to valid existing rights, applicable laws, regulations, and executive orders. Where points of diversion or conveyance structures occur in a Wilderness Area, the access routes and maintenance routines will be identified in the Wilderness Management Plan.

Appendix N: Comments and Responses



KENNY C. GUINN
Governor

SCOTT K. SISCO
Interim Director

STATE OF NEVADA
DEPARTMENT OF CULTURAL AFFAIRS
Nevada State Historic Preservation Office
100 N. Stewart Street
Carson City, Nevada 89701

DIVISION OF
STATE LANDS

RONALD M. JAMES
State Historic Preservation Officer

'03 MAY 14 AIO-27 May 12, 2003

MEMORANDUM

TO: Mike Del Grosso, State Lands
Heather Elliot, Nevada State Clearinghouse

FROM: Alice M. Baldrice, Deputy SHPO *Alice M. Baldrice*

SUBJECT: DEIS and RMP for the Black Rock High Rock Emigrant Trails National Conservation Area (SAI #E2003-105)

I will be unable to attend the meeting scheduled on May 16, 2003 for state agencies to air concerns and suggestions regarding the above referenced plan. I reviewed the documents and have one major comment regarding the potential selection of Alternative B, the preferred alternative. The selection of Alternative B allows the Bureau of Land Management the flexibility to respond to any resource degradation that might occur due to increased visitation. Although this sounds good in principle, the actions need to be tied to the expenditure of funds to ensure the long-term preservation of segments of the trail and other resources in the Black Rock High Rock Emigrant Trails NCA. How can this be accomplished when funding is dependent on Congress on an annual basis?

An example regards the improvement of roads, particularly on the east side of the Black Rock Range, described on page 4-79. The roads will be improved under Alternative B but additional monitoring of archaeological sites would not occur unless BLM noted increases in looting of area sites. Sites on the east side of the Black Rock Range have been exceptionally vulnerable in the past to looters due to their isolation and the attractive nature of the archaeology. Increasing accessibility without concomitant monitoring would be disastrous. We strongly recommend that BLM not wait until the worst happens but make increased monitoring by law enforcement and resource staff a component of any road improvements.

In conclusion, BLM should not wait for resource degradation to occur but be proactive. For each project undertaken, plan and budget for monitoring. The BLM doesn't need additional studies to determine that increased visitation results in increased resource damage. We know this happens. Instead, the BLM needs to remember that the intent of designation of this area was "to protect one of the last nationally significant segments of the historic emigrant trails..." Additional law enforcement and monitoring must be a part of increased visitation and road improvement.

Chapter 9 in the proposed RMP addresses implementation of the RMP. A substantial portion of this section deals with the application of Adaptive Management.

BLM has hired two new Law Enforcement Rangers (one in Cedarville and one in Winnemucca), a staff archaeologist for the NCA and a backcountry ranger to increase our presence in the NCA, monitor sites and curtail looting.

Appendix N: Comments and Responses

Draft Resource Management Plan and Draft Environmental Impact Statement for the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area and Associated Wilderness and other Contiguous Lands in Nevada.

GENERAL COMMENTS AND RECOMMENDATIONS

Wild Horse and Burros

Wild Horses and Burros, Threatened and Endangered Species and the Wilderness Act of 1964 all share language that require health rangeland and habitats. The National Conservation Area includes and influences the Massacre Lakes, Nut Mountain, Wall Canyon East, High Rock, Fox Hog, Granite, Calico, Warm Springs Canyon, Black Rock East, Black Rock West, Jackson Mountains, Lava Beds, Kamma Mountains and Antelope Range Herd Management Areas. Many of these herd management areas are not separate but function as complexes for the herds. The Bureau of Land Management's Wild Horse Strategic Plan required that each herd have an appropriate management level and be managed at that level at the time of this document.

It has been our observation that none of 14 wild horse herds have appropriate management levels that were determined under the same criteria nor was the available forage allocated the same for each herd. This matter of inconsistency proposed many problems with wild horse interests and resource people within the Bureau of Land Management. At the time the appropriate management levels were determined, the Bureau of Land Management did not consider the population genetics and longevity parameter of these herds. Funding and adoption program problems prevented the Bureau from ever achieving the appropriate management levels.

The Draft Resource Management Plan portrays the appropriate management levels and suggests that adjustments in stocking levels may achieve a thriving natural ecological balance as required by the Wild Horse and Burro Act. In review of the allotment specific or multiple use decisions that established these appropriate management levels, we find that all appropriate management levels are approaching 10 years old. Realizing that these old decisions were based upon three years of rangeland monitoring data, the document's appropriate management levels are obsolete and in need of review and new decisions.

Since the Resource Management Plan is to set guidance to new activity planning in the future, the document should recognize the need for new AML's and provide a consistent reasonable set of standard operating procedures to determine these AML's. The stakeholders and public should have full access to these matters at the time of the RMP.

We find the content in some sections of this draft allows for the use of helicopters over the wilderness areas and use of traps outside of the wilderness areas. While these measures might be desirable in a wilderness area, the practical matter of gathers may

BLM has gathered all the HMAs within the past several years, removing over 3,000 head of horses from the NCA and wilderness areas. This effort has resulted in most areas being close to the identified AML. BLM will continue to gather to balance horse numbers with the other resources and uses.

Historically AMLs were set in RMPs. A court decision a number of years ago required that AMLs be set or adjusted only through an evaluation process based upon site-specific monitoring data.

Because each Herd Management Area is different, the type of available monitoring information, the resource values and uses and the seasonal use patterns of wild horses are also different. Therefore it is not unusual that the approach used in setting AMLs on adjacent HMA varies.

The Land Health Standards provide a desired condition for all rangelands within the planning area. BLM works to develop strategies for managing all uses and values (including wild horses and burros) within the planning area to achieve those standards. If monitoring data indicates that impacts on resources are occurring as a result of livestock or wild horses or burros, appropriate adjustments will be made to the specific class of use (Decision WHB-7).

Appendix N: Comments and Responses

require more access to wilderness areas. Issues such as distance traveled from inception to trap site during capture are regulated. Our agency recognizes that helicopter census, helicopter gathers and traps are intrusive to the solitude and primitive values of a wilderness area, but the actions might be necessary to achieve the ecological balance or natural features of these areas.

Our agency cannot find the need or purpose of the RMP in respect to wild horse and burro management of the NCA. However, the Bureau should include the necessary standard operating criteria to determine appropriate management levels. This criteria must include the determination of carrying capacity, allocation of forage, genetic viability assessment and population dynamics parameters for proper management of wild horse and burros herds.

Responses to these comments are included in the response on the previous page.

Appendix N: Comments and Responses



KENNY C. GUINN
Governor

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF WILDLIFE

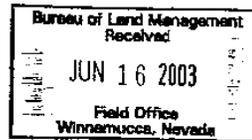
1100 Valley Road
Reno, Nevada 89512
(775) 688-1500 • Fax (775) 688-1595

R. MICHAEL TURNIPSEED, P.E.
Director
Department of Conservation
and Natural Resources

TERRY R. CRAWFORTH
Administrator

June 12, 2003

Terry Reed, Field Office Manager
Bureau of Land Management
Winnemucca Field Office
5100 Winnemucca Blvd.
Winnemucca, NV 89445



Dear Mr. Reed:

Thank you for the opportunity to participate in the development of the Resource Management Plan (RMP) for the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area and Associated Wilderness Areas. Please find attached our agency comments on the Draft RMP/EIS. We look forward to a final document and decisions that will meet both our needs for the effective management of these resources so important to the citizens of Nevada.

BLM's responses to your comments are included in the following pages.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doug Hunt".

Doug Hunt,
Chief, Habitat Bureau

Attachment

cc: Members, Board of Wildlife Commissioners
Chairman, Black Rock-High Rock NCA/RAC Subgroup

NDOW

Comments on the Draft RMP & EIS for the Black Rock Desert-High Rock Canyon Emigrant Trail NCA and Associated Wilderness

Thank you for the opportunity to participate in the development of this plan. As you are aware this area has long been an important resource to citizens of Nevada. The wildlife management direction for this area has been in development for many years. Recent management direction, provided by the Nevada Board of Wildlife Commissioners (Commission), and County Wildlife Advisory Boards have provided for the successful introduction of extirpated sub-species of Big Horn Sheep, the implementation of recovery for the threatened Lahontan Cutthroat trout, emphasis on the management of sage grouse and numerous non-game species and "watchable wildlife". In addition, this area remains an important resource to Nevada's outdoor sporting public, providing recreational hunting opportunity for native and naturalized species of wildlife.

There is a concern that the specifics of wildlife management relative to our agency's jurisdiction and responsibilities within the designated Wilderness and NCA could be compromised by the adoption of this RMP as written. The deferral of wildlife management decisions to activity plans to be developed sometime in the future would severely limit the states ability to plan and implement wildlife management activities in this area. For example, the specifics of all trap and transplant and survey inventory work with division aircraft is deferred to the minimum tool analysis found within the (yet to be written) Wilderness plan. The adoption of language limiting the use of established equipment and techniques will limit the ability of the state to monitor and manage wildlife, making it difficult to compare historic data collected prior to wilderness designation. Specific wildlife management activities should be analyzed in the RMP with regard to anticipated state management actions and appropriate use of equipment. In addition, a listing of critical management activities should be presented and analyzed as potential wildlife management actions to be conducted as the need arises.

Negotiated language authorizing continued maintenance and construction of water developments in much of the Wilderness and NCA is listed as a preferred alternative in the draft RMP. The "preferred" alternatives presented to the NCA/RAC planning group on June 2,3 recognized the jurisdictional issues with regard to wildlife management and water development. Specifically, the following language was presented and adopted by the RAC. **2.7.12.2.1 Wildlife Water developments "Existing Wildlife related projects, including water developments in the NCA and Wilderness would be repaired, maintained, and reconstructed. Inspection of projects would be completed regularly to minimize the amount of maintenance and reconstruction required. Maintenance activities would be conducted as needed, and maintenance of projects in Wilderness would be conducted using methods consistent with minimum tool analysis. These methods could include access by helicopter as well as non-mechanized means. New water developments or other wildlife-related projects could be constructed when the project would promote healthy, viable, and more naturally distributed wildlife populations and would enhance wilderness values; was required to preserve wilderness values; or was required to correct unnatural wildlife habitat conditions caused by human actions. Any projects constructed would be designed to minimize visual impacts."** This NCA/RAC consensus language should be carried forward into the final decision. To defer, the decisions authorizing such activities negotiated in the "public planning process" will

BLM has attempted to add specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. BLM is committed to working closely with NDOW in the future in order to effectively manage wildlife populations and habitats and is confident that any future required site-specific analysis could be completed in a timely manner. In addition, the Proposed RMP creates no restriction on aircraft surveys, as BLM has no jurisdiction on airspace.

The language in the plan is a direct result of consensus language from the RAC subgroup. The existing constructed wildlife water sources will be maintained as stated in Decision FW-10 of the section 8.2.12.2 of the proposed RMP. Construction of new wildlife projects will be authorized in wilderness if it meets the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964.

Appendix N: Comments and Responses

understandably violate a “public trust” for those who have been assured from the inception that negotiated “consensus” would matter.

Language listed in the “common to all alternatives” pertaining to management of naturalized wildlife species has not been supported by the state or the NCA/RAC team. Specifically, language listed under fish and wildlife management 2.4.12.2.2 **“Naturalized game birds would continue to be priority species for hunters in the Wilderness Areas, but no additional wildlife water developments or other habitat manipulations would be undertaken to manage naturalized game bird populations in Wilderness.”** Consensus by the NCA/RAC was contradictory to this language. Proposed wildlife population management activities including species selection and program priority are the jurisdiction and responsibility of the state. RMP language should not identify or dictate state wildlife management direction. Therefore we strongly recommend the deletion of the above italicized language from the plan.

Plan reference to management of Sage grouse habitat to broad management guidelines listed under “standards for rangeland health, and the adoption of the locally developed sage grouse conservation plan upon completion is recognized and was adopted by the NCA-RAC planning team and is supported for inclusion in the RMP.

Language listed under Preferred Alternative 2.7.12.1 **“Animal damage control in Wilderness would be allowed only to protect threatened and endangered species, and to prevent the transmission of disease to other wildlife and humans, and to prevent serious loss to livestock”** is not the jurisdiction of the BLM. For example, wildlife control activities to protect newly introduced species have been shown to be an effective tool in population establishment. These decisions are the exclusive jurisdiction of the state management authority and as such should not be considered in this RMP.

Additional language found in the “Common to all section” under 2.4.12.1.2. Reads as follows **“Trap and transplant activities associated with native wildlife species in Wilderness would be allowed if they were necessary to meet the minimum requirements for the administration of the Wilderness Areas. Use of gas-or electric-powered equipment and motorized vehicles, including aircraft, would be authorized in support of trap and transplant, or project development, activities when they were determined to be the minimum tools for implementing the project.”** Again, proposed wildlife population management activities including species selection and program priority are the jurisdiction and responsibility of the state. RMP language should not identify or dictate state wildlife management direction. The word native should be deleted from the above italicized language. This analysis to authorize routine wildlife management activities relative to equipment and motorized vehicles should be completed in this RMP. The RMP analysis should specifically recognize aircraft use where this use has already been established. Once again, the jurisdiction and legal mandates of the State must be weighed in this decision and cannot be deferred to another planning effort yet to be announced. NCA/RAC planning endorsed the development of activity specific planning and authorization in this plan.

Language assuring the continued access to the Wilderness areas via the “wilderness access routes”, including maintenance levels, should be found in this RMP and not deferred to other planning documents. The specifics of road construction and maintenance will undoubtedly need to be addressed in a comprehensive OHV transportation plan, but assurances for continued public access in those areas negotiated and granted by congressional action needs to be spelled out in this RMP.

The referenced decision is not included in the Proposed RMP. However, management of lands as wilderness will emphasize native wildlife species.

Comment noted.

The proposed RMP does not address the animal damage control activities conducted by NDOW outside designated Wilderness. The language in the proposed RMP is consistent with BLM's policy on Animal Damage Control in wilderness areas.

As mentioned previously, BLM has attempted to add specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. BLM is committed to working closely with NDOW in the future in order to effectively manage wildlife populations and habitats and is confident that any future required site-specific analysis could be completed in a timely manner.

Section 8.2.12 of the proposed RMP includes language directly from the NCA Act related to the jurisdiction of the State of Nevada to manage wildlife.

BLM Wilderness regulations and policy emphasize management of Wilderness for native wildlife populations. Decision FW-2, FW-7, FW-8, FW-10, FW-11, FW-12, and FW-13 in the proposed RMP provide the ability to authorize routine wildlife management activities including the use of aircraft.

The Final RMP/EIS includes modified language to address wilderness access routes (see decision TRAN-7). Maintenance levels within the planning areas to ensure access for the use and enjoyment of the NCA are listed in Table 8-1 and decision TRAN-3.

Appendix N: Comments and Responses

Proposed road closures and recreational changes to the ISA portions of the RMP should be handled in a separate document. In many cases it is easy to confuse NCA management proposals for the ISA portions. Management changes proposed for these areas are in question with regard to pending legal decisions. As such, these complex management decisions should receive the full wait of Winnemucca Field Office RMP planning proposed to commence following the completion of the Black Rock RMP.

And finally, the Black Rock-High Rock NCA/RAC Subgroup and Summit Lake tribe endorsed the concept of a long-term implementation team to review the adoption of additional activity plans and the interpretation and implementation of upcoming management. It was felt that the intent of the original planning efforts would be best served and preserved if voluntary oversight was provided to preserve planning intent and provide for periodic mid-course correction.

Because of the proximity to the NCA, and the need to make decisions on several unresolved issues, the Lahontan Cutthroat Trout Area was included in the planning process. This does not imply that the NCA legislation applies to this area.

The introduction to the Proposed RMP includes an outline for a public involvement group to participate in the implementation of the RMP.

COMMENTS BY THE NEVADA DIVISION OF STATE PARKS

On the

Black Rock Desert—High Rock Canyon Emigrant Trails National Conservation Area (NCA) Draft Environmental Impact Statement/Resource Management Plan (DEIS/RMP)

May 20, 2003

The Nevada Division of State Parks reviewed the **Black Rock Desert—High Rock Canyon Emigrant Trails National Conservation Area (NCA) Draft Environmental Impact Statement/Resource Management Plan (DEIS/RMP)** based on how the document addresses the eight outdoor recreation issues and 59 actions recommended to address the eight issues as they are cited in the soon to be released draft of Nevada's 2003 Statewide Comprehensive Outdoor Recreation Plan (SCORP). Federal laws encourage federal agency plans to be consistent with state SCORP's.

The Nevada Division of State Parks is responsible for the development and maintenance of Nevada's SCORP. The SCORP is a federal requirement for states to participate in the federal Land and Water Conservation Fund (L&WCF) Grants Program. Nevada will receive \$1.12 million in L&WCF grant moneys in FY 2003, half of which will go to Nevada State Park projects and half to local government projects.

BLM's responses to your comments are included in the following pages.

All eight of the outdoor recreation issues cited in Nevada's 2003 SCORP are relevant to the management of the Black Rock Desert—High Rock Canyon Emigrant Trails National Conservation Area. The eight issues are:

Issue # 1: Public Access to Public Lands for Diverse Outdoor Recreation

Issue # 2: Funding Parks and Recreation

Issue # 3: Recreational Trails and Pathways

Issue # 4: Balancing the Protection of Nevada's Natural, Cultural, and Scenic Resources with Users

Issue # 5: Protecting Water Resources as Vital Components of Nevada's Recreational Base

Issue # 6: Interpretation and Education of Outdoor Recreation Opportunities

Issue # 7: Nevada's Growing Population Places Increasing Demand on Outdoor Recreation Resources and Suppliers

Issue # 8: Coordination and Cooperation Between Recreation Providers

Appendix N: Comments and Responses

The four alternatives included in the DEIS/RMP were reviewed to determine which alternative would be most consistent with Nevada's 2003 Outdoor Recreation Plan. Alternative C—Emphasis on Visitation and Interpretation was found to be most consistent with Nevada's 2003 Outdoor Recreation Plan, with one exception. The NDSP strongly recommends that the plan include/allow the following from Alternatives B and C.

Plan includes/allows:

From Alternative C:

- ◆ **Transportation system upgraded for better access to remote areas.**
- ◆ **OHV use on 861 miles of BLM roads and vehicle routes.**
- ◆ **Emphasis on interpretation of historic trails and other cultural sites.**
- ◆ **Permitted recreational events subject to fewest restrictions.**
- ◆ **Visitor services at the highest levels, with a visitor center in or near the NCA.**

From Alternative B:

- ◆ **Retention of existing man-made water resources for wildlife in the Wilderness.**

The NDSP will reserve comment on the remaining plan elements of the four alternatives. Other state agencies are better qualified to respond to the remaining elements.

Based on the percentage of population increase, Nevada is the fastest growing state in the United States. Over 84% of Nevada residents aged 16 years old and older participate in outdoor recreation annually. Trail related outdoor recreation activities are very popular with Nevadans. Eight of the top ten outdoor recreational activities are activities that could occur on trails if trails are available (Nevada's 2003 SCORP). Over 29% of Nevada's residents (approximately 500,000) participate in off-road vehicle activities each year.

Nevada's top eight outdoor recreation issues cited in Nevada's 2003 Outdoor Recreation Plan illustrate how the plan elements recommended above for inclusion in the **Black Rock Desert—High Rock Canyon Emigrant Trails National Conservation Area (NCA) Draft Environmental Impact Statement/Resource Management Plan (DEIS/RMP)** would be consistent with Nevada's SCORP.

There is a growing need to protect, maintain, and increase public access to public lands for the greatest diversity of outdoor recreational users (issue # 1). There is a growing need to provide recreational trails and pathways throughout the state, in both urban and rural areas (issue # 3).

Protection of natural, cultural, and scenic resources needs to be put in balance with users. Create opportunities for users to participate in the protection, i.e., site stewards—mandate that a majority of fees paid in a recreation area stay in that area for improvements and maintenance. Citizens acknowledge this as an investment and a way to participate in the conservation of these resources (issue # 4). Water resources must be

The transportation system management described in TRAN-1, TRAN-2, TRAN-3, TRAN-4, TRAN-8, and OHV-1 attempts to strike a balance between providing for adequate access and conserving, protecting and enhancing the resources, including the setting of the emigrant trails and a wilderness landscape. The system would be designed to provide a series of primary access routes where the roads would be adequately maintained to provide for a wide range of public access combined with many miles of motorized trails where the public could experience solitude, isolation and the challenge of self-discovery. The decisions also provide a process to continually evaluate and adjust the management of the transportation system to meet the future needs for management.

Trail, camping and OHV uses would continue under direction of the RMP. Trail opportunities could be developed in certain cases as discussed in decision REC-13. The National Desert Trail would be routed through the NCA and Wilderness (see decision REC-14). OHV use would be limited to designated routes, with the exception of the playa, which would remain open to vehicle travel.

Volunteer opportunities such as those described in CRM-7 will be available to encourage participation by NCA visitors and to implement important resource projects. The NCA manages user fees under the Fee-Demonstration Project, which was designed to keep user fees for management of the area where they originated (currently, fees are only collected from activities that require a special recreation permit).

A variety of outreach methods would be used to inform visitors about the resources and opportunities available in the NCA. Public safety would be emphasized. See decisions for Public Outreach and Visitor Services (page 8-23 and 8-24).

Appendix N: Comments and Responses

protected to maintain the needed quantity, quality, and accessibility for public recreation. Recreation and wildlife depend on the limited water resources in Nevada (issue # 5). We need to encourage, fund and provide environmental, cultural, and heritage interpretation and educational programs and opportunities, especially outdoor opportunities, throughout Nevada (issue # 6).

Nevada's growing population is placing an increasing demand on recreation resources and recreation suppliers at all levels, statewide. New resources need to be identified, acquired, funded, and developed (issue # 7). Existing levels of outdoor recreation funding are inadequate to meet the recreation needs of Nevada (issue # 2). Coordination and cooperation between public and private recreation providers at all levels is very important. More true support from private citizens, user groups, and governmental entities (local, state, and federal) are important partnerships to pursue (issue # 8).

The Nevada Division of State Parks takes the position that public lands should be managed to meet the outdoor recreation needs of the residents of Nevada and the millions of out-of-state visitors that frequent the State annually while conserving the natural resource base that supports outdoor recreation activities on these lands. Public land management agencies should take proactive actions to accommodate visitors to public lands. This agency also believes that aggressive proactive management practices to accommodate visitor use occurring on public lands will result in a reduction of adverse impacts on the natural resources we all wish to conserve.

One of the most important aspects of a proactive approach is to prepare visitors using the NCA to insure visitor safety. The Black Rock—High Rock Desert environment can be fatal to visitors who are neither educated nor prepared for the hostile environment that this area may become at times.

It is also the belief of this agency that the vast majority of visitors to the NCA are law-abiding citizens who wish to comply with the laws. A proactive management approach is the best means to equip citizens to be law-abiding citizens. Well-informed law abiding recreationists become better conservationists.

The emphasis on visitation and interpretation cited in Alternative C as amended provides the best elements of a plan consistent with Nevada's 2003 Outdoor Recreation Plan.

Impacts to water resources from recreation use would be minimized through the use of camping restrictions and site designations in areas that are experiencing recreation related impacts (see decisions REC-17 and REC-18).

Decision VIS-2 as revised in the proposed RMP includes the establishment of an administrative site/visitor contact station in Gerlach as well as multifunctional visitor centers in other gateway communities. Details of outreach strategies would be developed in the Education/Outreach plan (see decision VIS-5). Many varieties of off-site interpretation and education would be encouraged along with minor on-the-ground provisions.

Partnerships with local communities and governments would be established to assist in providing recreation services for the NCA and the surrounding areas (See decision REC-17 and VIS-1 through VIS-4).

KENNY C. GUINN
Governor

STATE OF NEVADA



PAUL IVERSON
Director

DEPARTMENT OF AGRICULTURE
251 Jeanell Drive, Suite 3
Carson City, Nevada 89703
Telephone: 775-684-5333 ~ Fax 775-882-5121

June 9, 2003

Nevada Department of Agriculture comments regarding the Blackrock NCA Draft Resource Management Plan proposed alternatives:

1) LAND HEALTH STANDARDS

a) Alt. B is acceptable

2) TRANSPORTATION AND OHV ROUTES

a) Alt. C is acceptable, management options should remain flexible over time to deal with public safety and continued multiple use. Signs should be placed on all major thoroughfares and maps available at entrances so that the public knows where they are and where they are going. Will keep disturbance by public to a minimum and prevent unnecessary travel in areas where travel is undesirable. Matter of public safety.

3) CULTURAL RESOURCE

a) Alt. B is acceptable

4) NATIVE AMERICAN VALUES

a) Alt. B is acceptable

5) PALEONTOLOGICAL RESOURCES

a) No comment

6) WILDERNESS

a) No Action Alternative is preferred

7) SPECIAL DESIGNATIONS

a) No Action Alternative is preferred
b) Grazing language in Alternative A and B is unacceptable and contrary to the intent and language of the Act.

8) VEGETATION

a) No Action Alternative is preferred

Your comments were considered in the decision-making process for the Proposed Plan.

Land Health Standards apply to all uses and programs in all alternatives, including the Proposed RMP, except for the No Action Alternative as shown in sections 2.6.1, 2.7.1, 2.8.1, and 8.1.1.

The transportation system management described in TRAN-1, TRAN-2, TRAN-3, TRAN-4, TRAN-8, and OHV-1 attempts to strike a balance between providing for adequate access and conserving, protecting and enhancing the resources, including the setting of the emigrant trails and a wilderness landscape. The decisions also provide a process to continually evaluate and adjust the management of the transportation system to meet future needs for management. Decisions SIGN-1, SIGN-2, SIGN-3 incorporate the ability to change the installation specifications of signage in an adaptive manner.

Many of the elements from Alternative B for Cultural Resources and Native American Values are proposed in the final plan.

Comment noted.

Comment noted.

Comment noted. Additional grazing responses are included below.

Comment noted.

9) LIVESTOCK GRAZING

a) No Action Alternative is the only legal alternative with modification. The "Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area Act of 2000" states in Paragraph 7 "Public lands in the conservation area have been used for domestic livestock grazing for over a century, with resultant benefits to community stability and contributions to the local and State economies. It has not been demonstrated that continuation of this would be incompatible with appropriate protection and sound management of the resource values of these lands; therefore, it is expected that such grazing will continue in accordance with the management plan for the conservation area and other applicable laws and regulations."

Livestock grazing – Common to All Alt.

2.4.9.2 Grazing Management – Strike "the Mahogany Creek Exclosure portion of Soldier Meadows would continue to be excluded from grazing." Grazing can be managed through other means and this is contrary to the Act.

2.5.9 Only legal alternative – the other alternatives should not be published.

Any grazing language included in the Plan for areas outside of the NCA to be managed as a part of the plan should adhere to the intent of the Act and specific grazing changes should only be addressed in specific AMPs or LUPs and not in the NCA resource plan.

Grazing permitted at the time of passage of the Act is the correct terminology, not actual grazing occurring at the time of passage, to determine if grazing should continue. Changes to permitted grazing use can occur through the AMP and LUP process over time.

General Comments:

Initiation of the Oversight team of affected interests, state agencies and stakeholders through Memorandum of Understanding will allow those with management, use and oversight of land and resources in the NCA to develop an operational understanding and basis for working together over the long term that helps to satisfy the intent of the act while maintaining multiple use and rural economic stability.

Gary McCuin
Range Specialist.

Grazing would be restricted or not permitted in the Soldier Meadows Hot Springs, Stanley Camp Riparian Pasture and Mahogany Creek Exclosure areas to aid in the recovery of species listed as threatened under the Endangered Species Act. The recovery plans and recent Biological Opinions prepared by the FWS for listed species within these areas included the best available information and support the limitations on livestock use. Grazing would be restricted or not permitted in the High Rock Canyon and Little High Rock Canyon areas to allow for the continuing recovery of riparian vegetation in the narrow canyons where livestock previously concentrated. These areas also provide visitors with vegetation conditions similar to those experienced by the emigrants. In all these areas, the benefits to resources and uses other than livestock grazing are considered to be greater than the small losses of forage for livestock.

The NCA Act provides that livestock grazing should continue where it was permitted at the time of designation, subject to applicable laws, regulations and Executive Orders. The Stanley Camp Riparian Pasture and Mahogany Creek Exclosure areas are outside the NCA and Wilderness Areas and therefore not subject to provisions of the NCA Act. All the restricted grazing areas would continue past practices developed as a result of compliance with regulations implementing the Endangered Species Act, the Federal Land Management and Policy Act, the Clean Water Act, and other applicable laws.

Map 8-7 provides a comparison of the existing and proposed allotment boundaries. Decision GRAZ-12 in the proposed RMP would change the allotment boundaries to conform to historic livestock grazing areas. No currently ungrazed areas would be grazed as a result of the decision. No change in permitted livestock use levels would occur. The decision is appropriate for the RMP because the designation of areas for livestock grazing must occur in an RMP.

The language in the proposed RMP has been changed to reflect the wording in the NCA Act with respect to grazing permitted at the time of passage of the Act.

Chapter 7 (Section 7.4) provides for the formation of a public involvement group that would continue to advise the two RACs during RMP implementation.

Appendix N: Comments and Responses

COMMISSIONERS:
JOHN T. MCGILAN JR.
Chairman
BRADLEY D. QUILLICI
Vice Chairman
CLINT BENTLEY
BILL BRADLEY
TOMMY A. FORD
CHRIS MACKENZIE
DAVID McMINCH
ERIC J. OLSEN
MIKE RICHARD
TERRY R. CRAWFORTH
Secretary

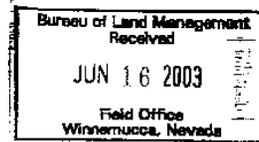
STATE OF NEVADA
BOARD OF WILDLIFE COMMISSIONERS
1100 Valley Road, Reno, Nevada 89512 • Telephone (775) 688-1500
Fax (775) 688-1207 • TDD (775) 688-1583



KENNY C. GUINN
Governor

Bob Abbey, Nevada State Director
Bureau of Land Management
1340 Financial Blvd.
Reno, NV 89502

June 12, 2003



Dear Mr. Abbey:

Thank you for the opportunity to participate in the development of the Resource Management Plan (RMP) for the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area and Associated Wilderness Areas. As you are aware, based on the response to the initial legislation, this area has long been an important resource to the citizens of Nevada. The wildlife management direction for this area has been in development for many years. Recent management direction, provided by the Nevada Board of Wildlife Commissioners (Commission), and County Wildlife Advisory Boards have provided for the successful introduction of extirpated sub-species of Big Horn Sheep, the implementation of recovery for the threatened Lahontan Cutthroat trout, emphasis on the management of sage grouse and numerous non-game species and "watchable wildlife". In addition, this area remains an important resource to Nevada's outdoor sporting public, providing recreational hunting opportunity for native and naturalized species of wildlife.

There is a concern that the specifics of wildlife management relative to the jurisdiction and responsibilities of Nevada Division of Wildlife (NDOW) within the designated Wilderness and NCA could be compromised by the adoption of this RMP as written. The Commission would like to strongly emphasize Sec. 4 (d) (8) of the Wilderness Act of 1964, which states; "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish...".

The Commission, in their negotiations with the Nevada Legislative delegation, was assured that specific wildlife management programs and activities would be identified and included in this planning effort. The deferral of these decisions to additional activity plans to be developed in the future is not acceptable. The lack of wildlife management decisions in this plan and the uncertainty of timely completion of the activity level plans leave us unable to plan and implement effectively within these areas.

The final plan should clearly identify that the population management direction and priority within the planning area will remain the jurisdiction of the State. Established management for naturalized species has provided Nevada citizens with a highly

Your comments were considered in the decision making process for the Proposed Plan.

Actions related to wildlife management in wilderness areas have been revised in the Proposed RMP to better conform to NDOW's identified actions as expressed during the comment period. Also, the Proposed RMP attempts to conform to the MOU between NDOW and federal land management agencies related to wildlife management in wilderness areas.

BLM has attempted to add specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. BLM is committed to working closely with NDOW in the future in order to effectively manage wildlife populations and habitats and is confident that any future required site-specific analysis could be completed in a timely manner.

Appendix N: Comments and Responses

valued resource in both the wildlife and fisheries programs. Specific population management actions such as, but not limited to, the continued management of naturalized species, water developments, trapping and transplant of native and naturalized species are critical to wildlife management. Additionally, authorization and/or implementation of animal damage control and emergency wildlife management actions as may be determined necessary by the NDOW should continue to be implemented on an as needed basis.

Wilderness access routes as identified in the Technical Revisions bill must be identified as open and maintained as passable. The Commission strongly urges the Bureau of Land Management (BLM) to expedite the construction of the public access routes called for within the Technical Revisions bill.

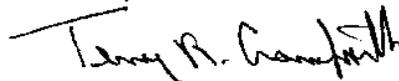
The final plan should authorize the established use of gas and/or electrical equipment and motorized vehicles, including aircraft, to survey, capture, transplant and monitor wildlife populations, provide for repair, maintenance, and reconstruction of existing wildlife water developments, and for the installation of new water developments. New water developments and other wildlife management structures shall be constructed within designated wilderness when:

1. The action will enhance wilderness values by promoting healthy, viable, and more naturally distributed wildlife populations.
2. Care is taken to construct and maintain projects that minimize visual impacts.

The Commission endorses the NDOW comments on this plan as attached and strongly urges the BLM to incorporate them in the final decision. We appreciate the opportunity to comment and look forward to continuing our strong partnership in the management of Nevada's natural resources.

At the May 9, 2003 meeting of the Board of Wildlife Commissioners, by a unanimous vote, the Commission authorized the Secretary of the Commission to provide a letter supporting NDOW's comments on the Blackrock NCA RMP, here contained.

Sincerely,



Terry R. Crawford,
Secretary of the Commission

cc: Members, Board of Wildlife Commissioners
Terry Reed, Winnemucca Field Office Manager

The Proposed RMP includes the language from the legislation that recognizes the role of NDOW in managing wildlife populations. The Proposed RMP includes provisions for animal damage control and emergency wildlife management actions in wilderness areas consistent with management of these areas to retain wilderness values.

Decision TRAN-7 has been added to the Proposed RMP to demonstrate that wilderness access routes and wilderness boundary roads would be maintained as necessary in the future to provide the access prescribed in the Act.

As mentioned previously, BLM has added specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. BLM is committed to working closely with NDOW in the future in order to effectively manage wildlife populations and habitats and is confident that any future required site-specific analysis could be completed in a timely manner.

Use of aircraft for population surveys is addressed in decisions FW-2 and FW-7 of the Wildlife Section. Maintenance of existing wildlife waters will continue as outlined in Decision FW-10 of the Wildlife Section. Captures and transplants of native species and construction of new wildlife projects would be authorized in wilderness if the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964 (Decision FW-8), is met.

Appendix N: Comments and Responses

County Commissioners:

DAN CASSINELLI, *Chairman*
JOHN H. MILTON III, *Vice Chairman*
CHUCK GIORDANO
BUSTER DUFURRENA
TOM FRANSWAY

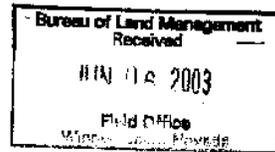
Humboldt County
Board of Commissioners

County Administrator:
BILL DEIST

COURTHOUSE, ROOM 205
50 W. FIFTH STREET
WINNEMUCCA,
NEVADA 89445
Phone: (775) 623-6300
Fax: (775) 623-6302

June 4, 2003

Dave Cooper, NCA Manager
Bureau of Land Management
Winnemucca Field Office
5100 E. Winnemucca Blvd.
Winnemucca, Nevada 89445



Dear Dave,

The Humboldt County Commission has reviewed the draft Resource Management Plan and Draft Environmental Impact Statement for the Black Rock Desert - High Rock Canyon Emigrant Trails National Conservation Area (NCA) and Associated Wilderness, and other Contiguous Lands in Nevada. In this review we started with the preferred alternative and will only offer input on the areas where we feel change is needed. We approached the review from the standpoint of maximum flexibility in the management of the NCA. In doing this we have included the maximum access to the NCA, the maximum visitor benefit/experience, and attempted to keep the safety of the public in mind.

We would recommend that a committee, which includes representatives of the Humboldt, Pershing and Washoe County Commissions, be created to work with the BLM in the implementation of the plan. In addition we would request that scheduled reviews between the BLM and the County be scheduled to discuss what is working as expected, what is not, and what early solutions, probably at lower expense, are possible.

At this point I would like to offer the following input on the plan related to specific areas. If we do not suggest changes in an area we would recommend that the preferred alternative be adopted.

TRANSPORTATION AND OHV ROUTES

- Adopt Alternative C for road closures as this provides the maximum access to the NCA.

Your comments were considered in the decision-making process for the Proposed Plan.

BLM recognizes the importance of communicating and working with local communities, jurisdictions, and other stakeholders. Management decisions have been incorporated into the draft and final RMP/EIS to pursue agreements with counties regarding roads (decision TRAN-6). In addition, Chapter 7 (Section 7.4) provides for the formation of a public involvement group that would continue to advise the two RACs during RMP implementation.

The transportation system management described in TRAN-1, TRAN-2, TRAN-3, TRAN-4, and TRAN-8 attempts to strike a balance between providing for adequate access and conserving, protecting and enhancing the resources, including the setting of the emigrant trails and a wilderness landscape. The decisions also provide a process to continually evaluate and adjust the management of the transportation system to meet future needs for management.

- We will work with the BLM on a transportation plan for the NCA with the understanding that much of the perimeter access is from County Roads and the level of maintenance rests with the County.
- We will be willing to enter into a cooperative agreement with the BLM to provide a means of addressing road improvements, especially the "High Road" and the Soldier Meadows Road. We agree that the Pershing County portions of these roads need to be upgraded.
- Turn around areas and/or parking areas need to be established on the cherry stem roads into the Wilderness. This needs to be done for safety reasons and to provide access to the wilderness.

Comment noted.

Comment noted.

Decision TRAN-11 includes provisions for vehicles to pull off of roads up to 50 feet for the purposes suggested. After completion of this RMP, a Wilderness Management Plan will be prepared to address site-specific management of the Wilderness Areas. As part of that process the need for turn around and trailhead parking areas will be analyzed and if needed, locations will be identified.

CULTURAL RESOURCES

- We would recommend Alternative C, as we believe it would offer a better visitor experience than Alternative B. It would also allow for research in the area and let people experience these resources.

Comment noted.

VEGETATION

- Any minimum tool requirement in the Wilderness areas must address the reality of noxious weeds. Large infestations, if they occur, will require the use of mechanized equipment, airborne or ground-based, to control/eradicate the populations. These approaches should not be excluded.
- An active weed inventory program that must be repeated frequently. Infestations are treated easiest when they are small and small populations can explode quickly when the right growing conditions occur. Because of access restrictions the Wilderness Areas should be inventoried frequently, five years or less.
- BLM should immediately adopt a weed-free forage program for all of the NCA and Wilderness Areas. This is one of the best approaches to keeping noxious weeds out of remote areas.

Weed control measures in Wilderness Areas would be determined through the minimum tool process. The proposed RMP does not exclude any potential treatment methods, but leaves the decision of what is the appropriate treatment in any situation to the site-specific analysis. Active weed inventory is ongoing and expected to continue. The requirement to use weed-free hay on public lands is a BLM policy, but that language has been added to the proposed RMP.

GRAZING

- We would recommend Alternative C as it provides the most flexibility.

Comment noted.

FISH AND WILDLIFE

- Alternative B is acceptable with the following emphasis: All wildlife water developments in Wilderness Areas should be maintained. Their purported adverse effect on wilderness and naturalness relates more to individual values than actual effect. They provide a positive effect for resources in the landscape. They help maintain populations of both game and non-game species that attract both hunters and non-hunters to the area, which provides economic benefit to Humboldt County.

The existing constructed wildlife water sources would be maintained as stated in decision FW-10 of the wildlife section in the proposed plan. Construction of new wildlife projects would be authorized in wilderness if it meets the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964.

LAND AND REALITY

- We would recommend Alternative C as it allows more flexibility including above ground utilities in certain corridors.
- The purchase of private lands by the Federal Government should be minimized and preferably avoided. If private landholders move from the county because the BLM purchases their property, their income and its turnover in the community are lost resources, and the county needs to be adding resources, not losing them.

RECREATION

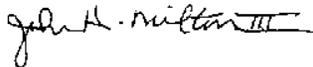
- Alternative C should be considered, as we believe it is more visitor friendly. This area needs to be used by as many people as possible.

PUBLIC OUTREACH AND VISITOR SERVICES

- If the zoning concept were retained in the Rustic Zone and the Front Country zone, we would recommend Alternative C. Once again this alternative is more visitor friendly and would provide the most opportunity for the visitor to enjoy and understand the NCA.
- Any Visitor Center facilities should be located at the Gateway to the Black Rock, Winnemucca, Nevada.

Thank you for the opportunity to provide our comments and input on this plan. We look forward to reviewing the final plan and working with you on the implementation of the alternative selected.

Sincerely,



John H. Milton, III
Vice-Chairman
Humboldt County Commission

xc: Humboldt County Commission

See decisions LAND-3, LAND-4, LAND-7 and LAND-8. The two existing utility corridors would be retained, however, above ground facilities would not be allowed on the playa.

There is no plan to purchase any private lands within the NCA; however, BLM will entertain purchasing lands with high resource values if BLM is approached by the landowner indicating a desire to sell that land. See decision LAND-5.

Comment noted.

Decision VIS-2 was revised in the proposed RMP to include the establishment of an administrative site/visitor contact station in Gerlach. Multifunctional visitor centers in other gateway communities, including Winnemucca, could be established through partnerships. Decision VIS-6 also supports the availability of high-quality information for visitors in gateway community visitor centers.

Appendix N: Comments and Responses

R. MICHAEL TURNIPSEED, P.E.
Director
Department of Conservation
and Natural Resources

PAMELA B. WILCOX
Administrator

KENNY C. GUINN
Governor



State Land Office
State Land Use Planning Agency
Address Reply to
Division of State Lands
333 W. Nye Lane, Room 118
Carson City, Nevada 89706-0857
Phone (775) 687-4363
Fax (775) 687-3783

STATE OF NEVADA

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

June 11, 2003

Dave Cooper
NCA Manager
Bureau of Land Management
Winnemucca Field Office
5100 East Winnemucca Boulevard
Winnemucca, Nevada 89445

2003 JUN 13 AM 11:41
RECEIVED JLM
WINNEMUCCA NV

Dear Dave:

This comment letter is to supersede and replace the previous letter sent to you from this agency dated May 28, 2003. The comments made in this revised letter are based on additional information and a better understanding of the issues relating to the Black Rock Desert High Rock Canyon Emigrant Trails National Conservation Area.

We want to thank you for all the assistance and information you and your agency have provided to the state and its agencies on the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area DEIS and Resource Management Plan (hereafter referred to as Black Rock NCA and DEIS). We appreciate very much the help provided in our evaluation of the draft plan and EIS.

The State of Nevada response to the Black Rock NCA and DEIS will consist of this letter and the attached comments of individual state agencies which address the specific concerns of those agencies. Some state agencies may have submitted comments directly to you. We urge you to also consider those responses as representing the concerns of that agency and the state.

In 1986, the Nevada Statewide Policy Plan for Public Lands was approved by Governor Richard Bryan. The document contains broad guidance for the management and use of the public lands in Nevada and are an expression of the state's position on how public land managing agencies will plan and manage those public lands. Local governments also adopted public land management policies as part of the statewide plan, some of which

Your comments were considered in the decision making process for the Proposed Plan. Responses to your comments are presented on the following pages.

Appendix N: Comments and Responses

Dave Cooper, BLM
June 11, 2003
p. 2

have since been updated, and these local policies should also provide guidance for the Bureau of Land Management in developing the Black Rock NCA RMP.

Pertinent goals established in the Statewide Policy Plan that should be applied in the planning effort are:

- Manage and utilize public lands on the basis of multiple use and sustained yield concepts, and in a manner that will conserve natural resources, protect and preserve the quality of the environmental, ecological, scenic, historical and archeological values; protect and preserve wildlife habitat and certain lands in their natural condition; and provide for long term benefits to the people of Nevada and future generations.
- Maintain and/or increase cooperation and coordination between local, state and federal agencies to facilitate the most effective and beneficial planning and management of Nevada's natural resources.
- Retain existing access to public lands and provide new means of access where necessary.
- Develop, conserve and protect scenic, historic and recreational resources for the benefit of present and future generations.
- Maintain and improve public access to recreational resources on public lands.
- Coordinate federal, state and local efforts to understand and protect the quality of the environment and natural ecosystems, considering also impacts on Nevada's communities and people.
- Conserve and protect the structures, objects, sites and trails of historic and prehistoric significance found on the public lands for the benefit of present and future generations.

General Comments:

The NCA and related wilderness were created by Congress over the wishes of the state, local governments and many of the users of the area to achieve various natural and cultural resource objectives. Putting the area "on the map" will be an enticement to many that would have not otherwise known of the area and will want to see what is there. The RMP should anticipate a possible range of impacts and/or needs that could occur by increased visitation, especially by those who are not prepared for the challenges the area presents. The RMP will be a long-range plan and anticipating these needs should be part

The pertinent goals identified from the State and local public land management policies are consistent with BLM's mandate under FLPMA and direction set forth in the NCA Act. Section 9.9 describes the relationship of the proposed RMP to other agency plans. As outlined in Section 1.8, BLM is required by FLPMA to ensure consistency with other federal, State, and local agencies and Tribal plans. Representatives from these agencies and Tribes were included in the NCA RAC subgroup to participate in the collaborative planning process.

The potential increase in visitation, the rate of that increase and the specific requirements of those future visitors are unknown. The proposed RMP is designed to be flexible in response to changes in visitation and resource conditions. Use of adaptive management is intended to provide the flexibility that you seek as an active part of the plan. Chapter 9 in the proposed RMP addresses implementation of the RMP. A substantial portion of this section deals with the application of Adaptive Management.

Appendix N: Comments and Responses

Dave Cooper, BLM

June 11, 2003

p. 3

of the plan. Relying on adaptive management to address problems when and if they occur does not go far enough. More needs to be included in the plan on how future problems will be addressed and when. Thresholds may need to be included in the plan that will force a resolution of the problems that will likely occur over time.

Efforts should be directed toward keeping as much of the available area open and accessible for public use as possible. The designation by Congress included over 750,000 acres of wilderness (378,329 acres in the NCA) where public access will be limited. The remaining area should be kept as accessible as possible by motorized vehicle use while protecting the natural and cultural resources found in the non-wilderness areas.

Because designation will result in more visitors, many of which will not be adequately prepared for the conditions and terrain of the area, a greater emphasis must be made on public safety. This should include road and access improvements, signing, designated primitive camping areas and providing the necessary information to the public. None of the alternatives presented go far enough in addressing these needs.

Many of the actions proposed in the various alternatives will lack adequate enforcement. As an example, simply identifying OHV use areas that are limited to certain existing designated roads will not prevent misuse from occurring. Another example is the restriction of camping within 200 feet of water. All proposals intended to protect natural and cultural resources must be monitored and all restrictions of use must be enforced. Adequate personnel to accomplish this must be assigned to the NCA, at least seasonally. Unless the plan calls for this higher level of monitoring and enforcement it is not likely these needs will be provided for when needed or requested.

Efforts must be made to inform prospective visitors of the conditions they will be facing before they enter the area. This can be accomplished by providing information centers or signboards at all major entry points to the NCA. At a minimum this should include information sites at Gerlach, Cedarville, Inlay, Lovelock and Winnemucca. An entry to the NCA from the north near Denio, also requiring an information center, should be anticipated. The information available should include current road conditions and suggestions on what type of vehicle is suitable for the road conditions to be encountered. The siting of these informational centers should be as near as possible to main traveled routes, such as I-80, not at the actual boundary of the NCA, to prevent people from traveling a long distance before learning of conditions they may be facing that could dissuade them from going further.

In this contemporary era it is impossible to recreate what the emigrants saw and experienced on the trail. There are those who would urge that efforts be made to do this. We do not support this concept, instead, efforts should be made to protect that which

Public Access would be provided through a network of roads and motorized trails (see Map 8-3). BLM would work in partnership with counties and the State to maintain reasonable public access to the NCA. See Transportation decisions for specific details (pg. 8-2 and 8-3).

Partnerships with local communities and governments would be established to assist in providing recreation services for the NCA and the surrounding areas (See decision REC-17 and VIS-1 through VIS-4).

Trail, camping and OHV uses would continue under direction of the RMP. Trail opportunities could be developed in certain cases as discussed in decision REC-13. The National Desert Trail would be routed through the NCA and Wilderness (see decision REC-14). OHV use would be limited to designated routes, with the exception of the playa, which would remain open to vehicle travel. The proposed RMP includes only 23 miles of road closures.

Volunteer opportunities will be available to encourage participation by NCA visitors and to implement important resource projects. The NCA manages user fees under the Fee-Demonstration Project, which was designed to keep user fees for management of the area where they originated (currently, fees are only collected from activities that require a special recreation permit).

Impacts to water resources from recreation use would be minimized through the camping restrictions and site designations in areas that experience recreation related impacts (see decisions REC-17 and REC-18). Vehicle camping could be restricted in portions of the Lahontan Cutthroat Trout Area and in both ACECs if alternative camping locations can be provided. The remainder of the NCA would be open to dispersed camping at least 1/2 mile from designated campsites. Primitive campgrounds could be developed in areas experiencing adverse resource impacts, where opportunities for overnight use would be retained.

A variety of outreach methods would be used to inform visitors about the resources and opportunities available in the NCA. Decision VIS-6 provides for the availability of high-quality information at multi-function visitor centers in gateway communities. Public safety would be emphasized. See decisions for Public Outreach and Visitor Services (page 8-23 and 8-24).

In addition, BLM has hired two new Law Enforcement Rangers (one in Cedarville and one in Winnemucca), and a backcountry ranger to increase our presence in the NCA and monitor use in the NCA.

Appendix N: Comments and Responses

Dave Cooper, BLM
June 11, 2003
p. 4

remains and provide increased opportunities to those who wish to see and use the area to do so in a relatively safe manner.

As mentioned above, the NCA was created over the objections of the local governments having jurisdiction over the area included. The BLM should work closely with these local governments to address their concerns about management and access needs to the NCA from their local areas. Since these local areas are likely to share in some of the visitor impacts, whatever economic benefits that may be derived for the rural areas should be sought. Installing information centers in or near some of the locations cited above would promote visitors stopping in these communities for various supplies and services.

Road access over public land to the NCA from where visitors will leave main traveled highways should be maintained by the BLM since the increase in traffic over these routes will have been caused by the creation of the NCA. The access roads should be well identified and maintained at a level that promotes user safety.

A seasonally manned visitor center, preferably in Gerlach and possibly collocated with an administrative center, should be established to provide information and maps to users of the area and to be a contact point for those seeking information prior to a visit. We expect that Gerlach will be the primary entrance used by visitors to the NCA. This visitor center should be augmented by unmanned informational sites at the locations mentioned above.

Provide throughout the NCA non-intrusive interpretative signs at key locations describing what occurred there or in the general vicinity, preferably using the words recorded by emigrants in their diaries. Some of this type of signing already exists on trail markers established by trail advocate groups but this use of signs and markers should be expanded to enhance the visitors experience and honor the emigrants that traversed the area.

Specific Comments:

We endorse the revised planning criteria stated on page 1-7 and the pre-planning criteria stated on pages 1-5, 1-6 and 1-7. These criteria should guide the decisions to be made in developing the final plan.

All roads/ways that will be closed to OHV use in those areas where use will be restricted to existing roads should be rehabilitated to discourage further use and eliminate resource damage.

On p. 3-48 information regarding "Active Mining Claims and Associated Grandfathered Mining Permits" should be updated in the FEIS since the deadline for mining notices (January 20, 2003) has passed.

BLM recognizes the importance of communicating and working with local communities, jurisdictions, and other stakeholders. Management decisions have been incorporated into the draft and proposed RMP to pursue agreements with counties regarding roads (decision TRAN-6). Chapter 7 (Section 7.4) provides for the formation of a public involvement group that would continue to advise the two RACs during RMP implementation.

The Proposed RMP adopts a strategy that focuses on maintaining major access corridors to current needs, including: the High Road, which provides east-west access to the southern portion of the planning area and the playa; the Soldier Meadows Road, Sulphur-Jackson Road and County Road 34 which provide north-south access through and around the planning area; and County Road 8A and the Stevens Camp Road which provides access at the northwestern portion of the planning area. These roads would include regular maintenance and directional signs, allowing visitors to access all areas of the planning area. The next tier of roads would be designated as motorized trails, maintaining current road conditions in the interior of the planning area. However, as visitor use increases, the functional classification and maintenance levels of motorized trail segments could be changed to protect resources and maintain adequate access with the planning area.

Decision VIS-2 was revised in the proposed RMP to include the establishment of an administrative site in Gerlach as well as multifunctional visitor centers in other gateway communities.

A Cultural Resource Management Plan will be prepared for the planning area. The majority of site interpretation will be through literature distributed to the public at visitor contact sites and centers, etc. Signs will be used very rarely, if at all.

Comment noted.

Decision WILD-2 addresses the rehabilitation of roads/ways to be closed.

Since publication of the DEIS, three mining claims have been dropped in the Pahute Peak Wilderness and have been removed from Table 3-17. Three mining notices have been extended and are active. One mining notice in the central Black Rock Range has expired, but remains open pending completion of reclamation.

Appendix N: Comments and Responses

Dave Cooper, BLM
June 11, 2003
p. 5

In Chapter 3- Social and Economic Conditions on page 3-68. Access to the NCA from Imlay should be added. The route from Imlay to the High Road may be used by some visitors and provides access to certain key areas along the emigrant trail such as Rabbithole Springs. This route should be identified as an NCA access route and treated accordingly.

The level of road maintenance specified in Table 2-4 on page 2-39 (Alternative C) is the best of the alternatives, however, we feel that the maintenance level for Resource Road 2086 (Rabbithole) should be upgraded from 2 to at least a 3, including those portions outside the NCA. This road will be used by many accessing the NCA from the Imlay area and warrants a higher grade for user safety.

The page headings for Alternative C on pages 2-39 through 2-46 are labeled "Chapter 2- Alternatives Considered But Not Included". This labeling should not begin until page 2-47, since Alternative C is being addressed on those pages.

Preferred Alternative:

Alternative C should be the preferred alternative since it best serves the user and visitor to the area. There are, however, various elements of Alternative B which should be combined with or used to replace similar elements in Alternative C. Those elements of B that should be used are:

- Those elements in Alternative B that are identical to those in Alternative C.
- 2.7.7.1 Special Designations. Areas of Critical Environmental Concern. We feel the retention of a portion of the ACEC in High Rock Canyon should be part of the RMP and Alternative B appears to be appropriate. The expansion of the Soldier Meadows ACEC by 2,077 acres with the management actions indicated also appears to be appropriate and warranted.
- 2.7.12.2.1 Fish and Wildlife Habitat. The measures contained in Alternative B appear to allow more management flexibility and should be used instead of Alternative C.
- 2.7.5 Paleontological Resources. Alternative B would be acceptable.
- 2.5.10 Wild Horses and Burros. Alternative B is preferred.

We thank you for letting the state and state agencies be a part of the process and allowing

Only the major gateway communities to the planning area are included in the Locale and Access section of Chapter 3. The access route from Imlay to the planning area is frequently used and will remain an access route to the planning area. The Proposed RMP does not preclude any access in the corridor from Imlay to Sulphur.

The portion of BLM Road 2086, the Rabbithole Road, within the Planning Area is identified by Pershing County as a county road. BLM recognizes this claim and identifies this road in the Proposed RMP as a County Road. BLM intends to maintain a transportation system for the planning area that meets the requirements to protect and enhance the values for which the NCA and Wilderness Areas were designated, while providing adequate access to current and future visitors. This system will involve regular coordination between BLM and the affected counties.

The headings mismatch in Chapter 2 was a typographical error contained in the Draft. It has been corrected in the Proposed RMP and Final EIS.

Comment noted.

Comment noted.

Comment noted.

The existing constructed wildlife water sources will be maintained as stated in decision FW-10 of the wildlife section in the proposed plan. Construction of new wildlife projects will be authorized in wilderness if they meet the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964.

Comment noted.

Comment noted.

Appendix N: Comments and Responses

Dave Cooper, BLM
June 11, 2003
p. 6

us to help develop the plan for the NCA. We look forward to reviewing the FEIS and RMP proposal.

Sincerely,



Heather Elliott
State Clearinghouse



Mike Del Grosso
Division of State Lands

Enclosures: Comments of Department of Agriculture
Comments of Division of State Parks
Comments of Division of Water Resources

cc: Vicky Oldenburg, Office of the Governor
R. Michael Turnipseed, P.E.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

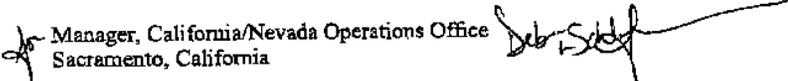
California/Nevada Operations Office
2800 Cottage Way, Suite W-2606
Sacramento, California 95825

June 17, 2003

In Reply Refer To:
AES/HC
ER03/0013

Memorandum

To: Manager, Black Rock Desert-High Rock Canyon Emigrant Trails National Management Area, Bureau of Land Management, Winnemucca, Nevada

From:  Manager, California/Nevada Operations Office
Sacramento, California

Subject: Review of the Draft Environmental Impact Statement (DEIS) and Resource Management Plan (RMP) for the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area (NCA)

We reviewed the subject document and provide the following comments for your consideration. Comments with more detail are provided in an attachment to this memorandum. This DEIS and proposed RMP address 1.2 million acres of BLM-administered lands covered by the National Conservation Area Act of 2000, and other contiguous lands. These contiguous lands include the South Playa, the Lahontan Cutthroat Trout Area (LCT Area), and lands that bound either Wilderness areas or Wilderness Access Routes that provide vehicle access to the interior of the Wilderness areas.

As a program level document, the broad direction of the BLM is clear. We will need site specific information, however, to fulfill Endangered Species Act (ESA), section 7 consultation requirements. This site specific information will allow us to fully address the potential effects to listed species, including Lahontan cutthroat trout, desert dace, and basalt cinquefoil. To achieve this we recommend conducting a programmatic consultation, followed by project specific consultations as the RMP is implemented. This approach is consistent with the RMP planning process adopted by the BLM.

Several management plans are expected to be developed and implemented (i.e., wilderness, vegetation and noxious weeds, recreation, water quality objectives, Soldier Meadows Activity Plan (SMAP)). In addition, a variety of inventory and monitoring protocols (i.e., for cultural resources, recreation, sage grouse, basalt cinquefoil) must to be developed and implemented in order to meet the goals of the RMP. We recommend the BLM establish a time line for the development and implementation of these critical elements of the RMP. We also recommend that regardless of the alternative selected, or components thereof, a recreation plan should be developed to allow for sensitive species management.

Your comments were considered in the decision-making process for the Proposed Plan. Responses to your comments are presented on the following pages.

BLM has prepared a program level Biological Assessment for the proposed RMP/EIS process. BLM will continue to fulfill requirements under ESA section 7 through activity level planning that is part of RMP implementation. Future site-specific projects will require additional consultation with the Fish and Wildlife Service where listed species or those proposed for listing are affected.

BLM agrees with these recommendations. Activity level plans will be prioritized and timelines established following the adoption of an RMP. A recreation plan identified in the RMP that includes actions to recover sensitive species will be developed at that time.

Appendix N: Comments and Responses

Staff from our Nevada Fish and Wildlife Office, in Reno have been working closely with BLM staff from the Winnemucca and Surprise Field Offices throughout the planning process. We look forward to a continued close working relationship throughout the remainder of the planning and consultation process. Questions about these comments may be directed to Bob Williams or Jody Fraser at (775) 861-6300.

Attachment

cc: Bob Williams (FWS, Reno)

ATTACHMENT

General and Specific Comments: Review of the Draft Environmental Impact Statement (DEIS) and Resource Management Plan (RMP) for the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area (NCA)

General Comments

Adaptive Management Program: We believe a comprehensive adaptive management approach should be taken regardless of the alternative selected. This would provide the BLM the flexibility to address changing management needs for the planning area over the long-term. We strongly support the implementation of Rangeland Health Standards for all uses and programs, as these standards will help inform the adaptive management process and identify long-term management and conservation needs.

Management Zoning: Front Country Zone designation for the Soldier Meadow area would focus visitor activities in this area and would conflict with the conservation needs of the sensitive biological resources endemic to the Soldier Meadow springs complex. Therefore, we recommend a Rustic Zone designation for this area.

Transportation and Off-highway Vehicle (OHV) Routes: We have general concerns about upgrading roads because of the potential increased visitation and resource damage in sensitive habitats. We also support the closure of roads in the vicinity of the Soldier Meadow Springs Complex. This would reduce degradation of sensitive species habitat within the area. Closing the BLM portions of spur roads that are intermingled with private lands, however, may result in these sections being relocated onto private lands closer to sensitive species habitats. Any closures should be evaluated on a case-by-case basis.

The Mahogany Creek crossing within the Stanley Camp Pasture area continues to widen and fill with sediment, degrading water quality and spawning habitat and creating passage barriers for both migrating and resident LCT. We recommend this crossing be retrofitted with either a Bailey bridge or a hardened elevated surface.

Cultural Resources: We recommend matching your cultural resource inventory and sensitive species program activities, with the goal of facilitating timely implementation of projects beneficial to sensitive species, where possible.

Special Designations (Area of Critical Environmental Concern (ACEC) and Wild and Scenic Rivers): We support maintaining the existing High Rock Canyon ACEC at 24,006 acres and expanding the Soldier Meadow ACEC to 3,770 acres. We also support acquiring private lands from willing sellers within and adjacent to the Soldier Meadow ACEC. Management of lands acquired by BLM that support federally listed, candidate, or sensitive species will of course need to take these species into account.

We support continued exclusion of grazing in all sensitive areas and recommend fencing be constructed to eliminate grazing from sensitive species habitats within the Soldier Meadow ACEC. We support adjusting the boundaries of the Buffalo Hills, Jackson Mountains, and Paiute Meadows grazing allotments to better conform to historical grazing patterns which will eliminate some sensitive areas from

Chapter 9 in the proposed RMP addresses implementation of the RMP. A substantial portion of this section deals with the application of Adaptive Management

This area is proposed for Frontcountry designation because of existing levels of concentrated use. Frontcountry designation would better support the types of facilities and signage needed for resource protection. The management zone boundaries have been adjusted based on public input. Please see Decision REC-15, Map 8-13 and zone descriptions, found in Appendix B of this Plan.

The Proposed RMP includes few upgrades to road segments. However the plan does include the ability to change the functional classification or maintenance levels of BLM roads and motorized trail segments when required to protect resource values and maintain adequate access to the planning area. The change in functional classification or maintenance levels includes the opportunity to add, modify or close road segments. This process would include opportunities for public involvement, appropriate levels of NEPA analysis and any necessary consultation to comply with existing law.

Decision LCT Area-3 includes provisions for the construction of hardened stream crossings in the LCT.

Comment noted.

Comment noted.

Appendix N: Comments and Responses

livestock use. We also support gathering excess wild horses and burros and maintaining or decreasing appropriate management levels (AMLs) to reduce habitat degradation.

We support limiting road use in Soldier Meadow ACEC within or near sensitive species habitats through road closures or relocations. Improving road conditions where roads are affecting sensitive species (e.g., stream crossings) would reduce impacts to these habitats.

We recommend reevaluating the proposal to designate the Soldier Meadow area for full fire suppression. Prescribed fire may be appropriate in some cases, for instance, to remove excess dead vegetation in ungrazed spring enclosures for the benefit of basalt cinquefoil, desert dace, or springsnails. Rehabilitation of and monitoring for non-native species in burned areas is also recommended.

Wilderness: We recommend the existing designated routes, portions of the main Barlett Butte BLM system road (#2052), the Summer Camp route, the Pole Creek West Road, and the route into Wood Canyon be included in the LCT Wilderness Study Area (WSA) and be closed to vehicle traffic. Information has been collected that indicates LCT are negatively affected by road use and maintenance. Furthermore, leaving the roads open will likely result in increased visitation and traffic that will more severely impact LCT habitat. Because this area supports one of only two self-sustaining lacustrine LCT populations, we recommend these routes be closed to vehicle use until monitoring indicates the habitat has recovered sufficiently to support increased vehicle traffic. Additionally, we support inclusion of the 10 acquired wilderness inventory units in the LCT WSA.

We believe the goals and objectives of wildlife management within Wilderness Areas should focus on native species and natural population dynamics. As a result we recommend against the creation or maintenance of artificially constructed wildlife water developments in Wilderness Areas, except where they are necessary to recover listed species.

Vegetation: We support restoration activities where appropriate. This includes control of noxious weeds, with priority given to sensitive species habitats. Because of the potential of infestation by noxious weeds, we recommend that BLM minimize the number of vegetation management projects they implement unless there is a rigorous, long-term weed monitoring and control program associated with the projects. We request additional information be provided regarding the implementation of green stripping and its benefits, costs, and expected maintenance of these areas. Finally, we suggest the BLM require appropriate reclamation and weed management plans for all gravel pits that are developed within the planning area.

Fire Management: We do not see clear evidence supporting the conclusion that eliminating grazing from the Mahogany Creek enclosure and Stanley Camp Pasture would maintain increased fuel loads and could indirectly increase the size of potential fires and fire suppression costs. In fact, trespass cattle grazing within the enclosure has been an issue for this area for the past 10 years, and yet the human-induced fire in 2000 burned intensely through the woody vegetation in this area.

Livestock Grazing: As stated previously, we support altering livestock grazing use areas within the Soldier Meadow ACEC to benefit sensitive species and their habitats. Fencing sensitive species habitats is also desirable. We recommend not opening the Stanley Camp Pasture to grazing, and

The Category A polygon at Soldier Meadows is centered on the private lands associated with the ranch, not habitat associated with the rare species. Those areas are designated as Category B, where fires could be used to meet resource objectives.

As stated in Decision LCT Area-3 of the Wilderness Section, restrictions on motorized vehicles will be implemented when monitoring shows negative impacts are occurring to LCT.

It is BLM's policy that wildlife management in wilderness focus on natural population dynamics. Active management of these areas is allowed for in the Wilderness Act when it is proven to be the minimum required action necessary for the management of the area as wilderness. Generally, active management in wilderness areas will only occur to mitigate a human caused impact such as invasive weeds, or loss of habitat.

Green stripping was included in the plan as one of several potential tools that could be used to reduce wildfire size in areas dominated by invasive, flammable species. There are no current proposals to use green stripping within the Planning Area so no specific additional information can be provided on implementation including costs and maintenance. If green stripping were chosen as an appropriate technique for a given site, site-specific analysis would be completed prior to implementation.

Grazing removes fine fuels at a rate of about 1000 pounds per AUM. Depending upon the levels of grazing, this reduction in fuels may be sufficient to alter fire behavior in such a manner that fires spread more slowly. This could lead to reduced fire size and lower suppression costs.

All alternatives limit grazing within the Soldier Meadows ACEC in order to protect sensitive species and their habitats. The level of this protection varies among the alternatives. The Stanley Camp Pasture would be excluded from grazing under Alternatives A, B and C. The Mahogany Creek Enclosure portion of the Soldier Meadows Allotment would continue to be excluded from grazing (GRAZ-4). Additionally, water quality of both the Mahogany and Summer Camp Creek watersheds would be managed to meet the life history requirements of populations of Lahontan Cutthroat Trout (GRAZ-10).

Appendix N: Comments and Responses

suggest that livestock grazing be removed from Mahogany and Summer Camp creeks to allow for recovery of LCT.

We ask that you clarify and inform the Reno Fish and Wildlife Office of the process for incorporating the terms of Multiple Use Decisions (MUDs) for livestock grazing into management of the planning area. For instance, grazing management on the Hot Springs Pasture of the Soldier Meadow Allotment may conflict with recreation management within the NCA. Additionally, management of federally listed and candidate species may also result in conflicting objectives. How will potential allotment boundary adjustments and operator flexibility affect MUDs? How is operator flexibility defined? What are the implications with respect to sensitive resources, riparian areas, and streams and springs?

Wild Horse and Burros: As stated previously, we support gathering excess wild horses and burros and maintaining or decreasing AMLs to reduce habitat degradation. We prefer that AMLs be decreased as prescribed in the Rangeland Health Standards.

Fish and Wildlife: We support improving habitat for sagebrush dependent species by implementation of actions to benefit sage grouse and pygmy rabbit. We recommend the document include language to the effect that, in coordination with their partners, BLM will adopt and consider the Western Association of Fish and Wildlife Agencies' guidelines for managing sage grouse.

We support restrictions and permanent and seasonal closures of vehicle and OHV routes, especially in riparian areas and sensitive species habitats. This includes restrictions on recreation use in ACECs.

We recommend the BLM reassess the potential for use of wetlands or riparian habitats by wading or migratory birds within the NCA boundaries. It is likely that a variety of bird species will utilize even very small wetlands or riparian zones relative to the landscape as resting or foraging grounds.

Special Status Species: Because of the expected increases in visitation to the NCA, we recommend activities within sensitive species habitat be closely managed and monitored to ensure adverse effects to these species are avoided or minimized. A comprehensive adaptive management program will allow for data collected through monitoring to inform the decision making process when addressing issues within these areas.

We support managing streams to meet the life history requirements of LCT. While we prefer permanent road closures within the vicinity of Mahogany and Summer Camp creeks within the Stanley Camp Pasture, we strongly support a seasonal closure to protect LCT spawning habitat. Road closures in these riparian areas would greatly enhance the ability to recover LCT in this region. Also, we recommend removal of nonnative fish species and/or stocking listed native species for recovery purposes.

Support of specific actions that would provide protection and conservation of special status species, such as habitat protection, restoration, and rehabilitation; OHV limitations and recreation restrictions; and gathering excess wild horses and burros and maintaining or decreasing AMLs, has been expressed under previous headings.

The relationship between the Multiple Use Decision (MUD) process for grazing and wild horses and other uses of the public land is complex. During the allotment evaluation process, the impacts of livestock grazing practices and wild horse and burro management on all the applicable resources in the allotment are evaluated. If conflicts are identified the MUD can be modified to meet the multiple uses within the allotment. The MUD must correspond to a specific area authorized for grazing. If allotment boundaries were adjusted for any reason, the MUD for that allotment would apply to the area within the altered allotment area. Operator flexibility is the range of potential actions, including timing, duration, frequency, intensity, and area of livestock use, a livestock grazing permittee may take without BLM being required to further analyze the potential actions. The MUD will include ranges or thresholds for grazing practices that define the limits of operator flexibility. When federally listed or candidate species occur within a grazing allotment, BLM is required to consult with the FWS prior to issuance of the MUD. Also the allotment evaluation process leading to the MUD requires that consideration of all the resources, including riparian areas, springs and streams be included to meet RMP objectives and Rangeland Health Standards.

The designated AMLs are considered appropriate to ensure a thriving ecological balance among wild horse and burro populations, wildlife, livestock, vegetation resources, and other resource values. AMLs are changed either up or down following site-specific analyses of monitoring data. RMPs were the vehicle to set AMLs until court decisions required site-specific analysis. AMLs can be adjusted when data exist that indicate that adjustment is required to meet Land Health Standards or other resource objectives. It is BLM policy to gather horses and burros to achieve AML. The Land Health Standards provide a desired condition for all rangelands within the planning area. BLM works to develop strategies to achieve those standards for all uses within the planning area to.

Decision FW-3 requires BLM to use the best available guidelines for managing sage-grouse including Western Assoc. of Fish and Wildlife Agencies' guidelines.

Camping and vehicle travel would be limited to designated areas in the High Rock Canyon and Soldier Meadows ACECs. The NRS statute that restricts camping within 300 ft. of springs would also be adopted. Sections 3.12.3.6.6 and 3.12.3.6.7 have been modified to include the potential for wading or migratory birds in wetlands and riparian habitats.

The Proposed RMP includes an adaptive management approach (section 9.2 in Volume 3). This approach will also address monitoring sensitive species habitats. Neither permanent nor seasonal road closures are included in the proposed RMP within the Stanley Camp Pasture. There are provisions for future closures, either permanent or seasonal, if monitoring documents impacts from human use. There is also a provision that additional restrictions to human uses could occur, including closure to camping, if documented impacts to the trout occur. Finally the plan encourages the development of off-site recreation facilities on private and nearby tribal lands as a means of reducing recreational use within the Mahogany Creek watershed. Removal of nonnative species and stocking of native species would be consistent with decisions in the Proposed RMP to recover populations and improve habitats of all special status species.

Appendix N: Comments and Responses

Water Resources: Overall, we believe the implementation of Rangeland Health Standards will facilitate recovery and rehabilitation of water resources. Limitations on grazing, restrictions on camping and recreational uses within 300 feet of springs, and designating vehicle routes as open, closed, or limited will likely result in reduced soil erosion and stream sedimentation, recovery of vegetative cover in riparian areas, and increased hydrologic function of streams. We also believe maintaining or modifying existing authorized water diversions and troughs may degrade water quality and cause increased water temperatures downstream.

Land and Realty: As stated previously, we support acquiring private lands from willing sellers within or adjacent to the existing Soldier Meadow ACEC. We also support acquiring private lands from willing sellers along occupied and unoccupied LCT recovery streams within NCA.

Soils: We support reducing soil disturbance, compaction, and erosion by implementing day-use designations and road closures, limiting OHV use, and concentrating recreational sites into specified areas.

Recreation: We encourage the BLM to implement the SMAP to improve protection of sensitive resources within the Soldier Meadow ACEC. This includes managing springs to reduce impacts to desert dace and springsnails.

We recommend not allowing recreational users to camp in or near the riparian areas of Mahogany and Summer Camp creeks or developing campgrounds within Stanley Camp Pasture. Restricting camping and other recreational uses within these riparian areas will greatly enhance the ability to recover LCT in this area.

Woody debris is an important habitat component for both aquatic and terrestrial species. We recommend that wood for campfires be imported and collection of firewood (including dead and down wood) be prohibited, especially in areas around sensitive species habitats.

SPECIFIC COMMENTS:

Page 3-14, 3.6.2: We recommend including language explaining that the LCT population that inhabits the Mahogany Creek watershed is one of only two self-sustaining lacustrine populations, and is genetically pure.

Page 3-16, 3.6.2.2: Currently, LCT is listed as threatened under the Endangered Species Act of 1973, as amended, not endangered.

Page 3-22, Table 3-7: We recommend changing the title of the Species of Concern section on this table from "...that may occur..." to "...that are known to occur..."

Page 3-30, 3.12.1: Please clarify the language in this paragraph to reflect the consultation process. The Service provides species lists to the action agency that identifies federally listed, proposed, candidate species as well as species of concern that may occur in the project area. A biological opinion is provided for those listed species within the action area that may be adversely affected by the actions proposed by the agency.

Comment noted. Where existing water developments are resulting in impacts to water quality, corrective remedies may be identified at the activity planning level.

There is no plan to purchase any private lands within the NCA; however, BLM will entertain purchasing lands with high resource values if BLM is approached by the landowner indicating a desire to sell that land. See decision LAND-5.

Comment noted.

Camping in the LCT area will be limited to existing sites. If monitoring indicates unacceptable resource impacts, sites would be closed and restored to natural conditions. If alternative opportunities can be provided on private or other public lands outside of the LCT watershed, overnight vehicle camping would be restricted. Please see decision REC-11 of the proposed RMP. No campground would be developed by BLM in the Stanley Camp Pasture as proposed in Alternative C of the Draft RMP.

Visitors would be encouraged to minimize the impacts of campfires and would be encouraged to use imported firewood only (See decisions REC-3 and REC-4). Supplemental rules developed through site-specific plans will address collection limitations or restrictions in specific areas.

A paragraph including the suggested information on LCT has been added to Chapter 3.

The suggested change has been made.

The suggested modification has been made.

Section 3.12.1 has been updated to better reflect the consultation process.

Appendix N: Comments and Responses

Page 3-31 and 32, 3.12.2: It appears the information on LCT is not up to date. Our understanding is that LCT does not currently occur in the North Fork of Jackson Creek, and both the North Fork of Battle Creek and Colman Creek have been identified as occupied habitat, not potential habitat. Additionally, the 1996 Nevada Division of Wildlife reference should be included in the literature citation.

The section has been updated and the NDOW reference added to citations.

Page 3-38, Table 3-14: For the springsnails under Candidate Species, please clarify that the "proposed" designation pertains specifically to BLM status.

The suggested modification has been made.

Page 3-39, Table 3-15: The North Fork of Battle Creek needs to be added to the table under LCT since it is currently occupied habitat.

The suggested modification has been made.

Appendix N: Comments and Responses

Land Health Standards

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
1	2.4.1 Land Health Standards. Rangeland Health Standards should apply across the board—for grazing and for recreation. Healthy land should apply to all users and the resources. We should say that here.	Land Health Standards apply to all uses and programs in all alternatives, including the Proposed RMP, except for the No Action Alternative as shown in sections 2.6.1, 2.7.1, 2.8.1, and 8.1.1.

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
2	Include no new roads or road upgrades unless and until BLM complies with statutory procedures required by NEPA and the National Historic Preservation Act (NHPA), and affords full and open public participation.	See decision TRAN-1. The Proposed RMP includes relatively few increases in road maintenance that would increase surface disturbance. Initial maintenance levels are presented in Table 8-1 and TRAN-3, and assessed in this document. Upgrades in road condition or maintenance levels to implement the RMP would require site-specific inventories, necessary consultation for NHPA and other laws, and the appropriate level of NEPA analysis. The RMP process included the involvement of Nevada State Agencies including the Office of the State Historic Preservation Officer. Comments received during the scoping period and during the formulation of alternatives were considered in the development of the alternatives.
3	I understand that 6 miles of original emigrant trail were "mistakenly" bladed while upgrading a road. I believe that unimproved roads contribute to the feeling people have of the "primitive character" of the area, and that the challenge of driving on those roads enhances the feeling of the "emigrant experience" and a sense of self-reliance to be gained by following the trail. The primitive character of the NCA would be destroyed by being able to drive on "good" roads. Improvement of interior roads within the NCA should be done only when absolutely necessary; roads should not be improved for the convenience of traveler (or ranchers).	The Pershing County Road Department graded about 6 miles of county road in the Rabbithole Spring area that they have infrequently graded in the past. A portion of this county road overlays the Emigrant trail in this area is considered Class D, Trail Converted to Improved Road.
4	On page 3-7 (Volume 1), it states, "the Act mandates that the RMP inventory and designate a transportation system and provide appropriate signage." We cannot find this mandate anywhere in the final version of the enacting legislation. Please cite the section in the Act used as the basis for this process. We question the need or purpose for measuring routes in an "open area," especially since "open areas" allow cross country travel and routes in this area can change from year to year due to weather. Unless measuring and mapping of routes in the open area is a prelude to route designation and a change to a limited area designation, please reconsider this practice. In all three action alternatives the acreage is the same: Limited Area = 346,191 acres and Closed Area = 751,879. In general, will new routes be allowed in the Limited Area? If the answer is yes, please clearly state that in the Final RMP. The change from the "open area" existing acreage (No Action) of 435,575 acres to the three action alternatives amount of 104,546 acres could be a significant impact. Very little discussion is presented in the DRMP Chapter 4 concerning the loss of recreational opportunity and displaced use from this change. Please expand on the justification for such a substantial reduction in open area acreage. At the very least, the reduction in open area acreage justifies Alternative C -keeping as many roads open as possible to accommodate the different but related "open area" users.	The reference to the Act on page 3-7 referred to in this comment is under Section 3.2.2, OHV Designations. Section 5(c)(2) of the NCA Act limits OHV use to designated routes and designated areas identified in the RMP pursuant to Section 5(e), which incorporates appropriate decisions from previous plans. In implementing this mandate, routes must first be inventoried as part of the RMP process and open, closed, and limited designations created to meet the intent of the Act. Information on the miles of route on the playa was included in the EIS to provide an explanation of the roads on the playa in a number of the maps. OHV area designations are designed to delineate areas where OHV use should be eliminated (closed areas), areas where OHV use should not be restricted (open areas), and areas where OHV could continue on designated routes and trails. Decision TRAN-4 provides for development of new roads and trails where consistent with the intent of the Act in areas designated as open to OHV use on designated roads and trails. Sections 4.2.1.19, 4.2.2.19, 4.2.3.19, 4.2.4.19 and 4.2.5.19 "from justifies Alternative C -keeping as many roads open as possible to Transportation and OHV management" in the FEIS discussion the impacts accommodate the different but related "open area"

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
		users.
5	Please add a qualifier to the statement on page 3-7 (Affected Environment) in regards Donnelly Creek Road. Even though the existing condition may preclude passage by compact or 2WD cars, it is legally open and passable to 4 wheel drive vehicles.	Section 3.2.1 has been modified to indicate that many segments of BLM roads are passable only in 4-WD, high clearance vehicles.
6	The road just east of Little High Rock Canyon needs to be improved (gravel dumped in the road bed may be all that is necessary) since resource damage is already occurring with vehicles driving around the mud and water in the roadbed.	Decision TRAN-3 in the Proposed RMP provides for the site-specific maintenance proposed in the comment.
7	The level of road maintenance specified in Table 2-4 on page 2-39 (Alternative C) is the best of the alternatives, however, we feel that the maintenance level for Resource Road 2086 (Rabbit-hole) should be upgraded from 2 to at least a 3. This road will be used by many accessing the NCA from the Imlay area and warrants a higher grade for user safety.	The portion of BLM Road 2086, the Rabbit-hole Road, within the Planning Area is identified by Pershing County as a county road. BLM recognizes this claim and identify this road in the Proposed RMP as County Road. BLM intends the maintenance of a transportation system for the planning area that meets the requirements to protect and enhance the values for which the NCA and Wilderness Areas were designated while providing adequate access to current and future visitors will require regular coordination between BLM and the affected Counties.
8	The "transportation" plan (p.2-6) should be developed with full and open public participation. An EA should be written to determine the environmental impacts of improving the Pershing County portion of Soldier Meadows Road, including whether a higher speed road would increase accidents and the need for law enforcement and search and rescue activities of visitors unprepared for the primitive nature of the NCA or increase vandalism of historic and paleontological resources.	The guidance in the RMP should be sufficient to operate the transportation system without a subsequent transportation plan. However, anytime that changes in functional class or maintenance level of a motorized trail or road segment is proposed that would result in new surface disturbance, include the Pershing County portion of the Soldier Meadows Road, inventories and the appropriate level of NEPA analysis would be completed prior to any surface disturbing activities.
9	One of the purposes of this draft plan/EIS was to clearly identify the routes that would be designated for use in the planning area, Those routes not specifically designated would be 'closed. Closure priorities should be given to segments of the historic trail still retaining more primitive values, routes causing resource damage such as those in the dune areas along the edge of the playa, those that have more than one route already accessing an area, etc.	The transportation and OHV maps in the Proposed RMP (Maps 8-2a-f and 8-3) have been updated to reflect the best available information collected in the field and received from the public. The routes included in the Proposed RMP for closure include segments of the emigrant trail, places where a motorized trail is causing resource damage to stream habitats and duplicate access routes. Decision TRAN-8 provides a process to continuously evaluate road and motorized trail use and conditions during the life the RMP and provide mechanisms to close or change road and trail management based upon site-specific information.
10	First I would point out that listing the area of limited use to OHV's (i.e. alternatives A,	The NCA Act stated that use of motorized vehicles in the conservation area

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
	B, & C) as "acres" is misleading. This is an unnecessary, unfair and highly overdone reaction to OHV use in this area! After all, what type of land can recover more quickly from tire tracks than the dust of a flat, windy playa?	shall be permitted only on roads and trails and other areas designated for use of motorized vehicles. The OHV decisions (OHV-1) provide for a large open area (Map 8-3) that includes the entire Playa and the remainder of the area is designated for motorized use on roads and trails. 23 miles of roads are proposed for closure in the RMP.
11	Language assuring the continued access to the Wilderness areas via the "wilderness access routes", including maintenance levels, should be found in this RMP and not deferred to other planning documents. The specifics of road construction and maintenance will undoubtedly need to be addressed in a comprehensive OHV transportation plan, but assurances for continued public access in those areas negotiated and granted by congressional action needs to be spelled out in this RMP .	The Final RMP/EIS includes modified language to address wilderness access routes (see decision TRAN-7). Maintenance levels within the planning areas to ensure access for the use and enjoyment of the NCA are listed in Table 8-1 and decision TRAN-3.
12	The increased impact on the county roads due to creation of the Black rock NCA and Black Rock Wilderness is already quite noticeable. This increased traffic has in some cases overtaxed the ability of the local county road crews to properly maintain our roads causing travel hardship not only on the visitor but especially us locals that must use these roads. I believe the OHV routes as they stand are a bare minimum for fair access to the NCA & Black Rock Wilderness areas. Another fact to consider is that we need to use every means available to fight fires in the Black Rock NCA/Wilderness including mechanized as well as aerial. Shutting down the existing OHV routes will severely hamper firefighting efforts in the NCA & Black Rock Wilderness areas.	Discussion with County Road Departments during the preparation of the DEIS revealed few specific concerns from the Counties. One issue that did surface is the inability of Pershing County to maintain their portion of the Solider Meadows Road. The Proposed RMP includes provisions for BLM to support Pershing County including allowing BLM to take over the responsibility for this road. BLM recognizes that as visitor use changes over time, the ability of the Counties to maintain their roads within the planning area could change. BLM will work cooperatively with the Counties to meet this challenge. The closure of OHV roads and trails in designated wilderness areas is required to meet the legislative requirements to manage the areas as Wilderness. The Act also indicated that OHV use be confined to designated roads and routes, except for areas designated for open use. The Proposed RMP closes 23 of almost 1000 miles of existing roads and trails, including County Roads. Use of motorized and mechanized equipment for firefighting and other emergencies is provided in the Wilderness Act and BLM's regulations. Nothing in the Proposed RMP reduces those provisions.
13	Wilderness access routes as identified in the Technical Revisions bill must be identified as open and maintained as passable. The Commission strongly urges the Bureau of Land Management (BLM) to expedite the construction of the public access routes called for within the Technical Revisions bill.	Decision TRAN-7 has been added to the Proposed RMP to demonstrate that wilderness access routes and wilderness boundary roads would be maintain as needed in the future to provide the access provided in the Act.

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
14	Areas should be designated Closed, Limited, and Open to OHVs as indicated for Draft Alternative B, assuming that the Closed area includes the dunes along the edges of the playa in the Black Rock and Double Hot areas and between the Quinn and Black Rock. These dunes must be protected from the damage current being done by OHVs.	The OHV designations were modified to exclude OHV use from dunes on the playa. The dune areas surrounding the playa are limited to designated routes. These modifications are included in decision OHV-1 and shown on Map 8-3.
15	I recommend that roads be closed as shown for Alternative C, with one addition, as follows: The first half mile of the trail, where it rises from today's Rye Patch Reservoir, is a two-track. It is used by people approaching the reservoir. It is important to be able to drive that segment of trail/two-track, for good interpretation of the trail. That short segment should be designated as an open road, as is the road that leads to it from the main gravel road. There are two small playas northeast of Black Rock Springs, known as the "High Dries." The currently used road to the High Dries should be kept open while the non-existent road shown on the maps should be closed, exactly the opposite of what is indicated for Alternatives A and B.	The portion of the trail near Rye Patch Reservoir has been added to the road and route database and included as a motorized trail on Maps 8-2a and 8-3. None of the specific routes described in the comment would be closed in the Proposed RMP. The plan would provide for future evaluation of existing routes (Decision TRAN-8) based upon resource damage and vehicle use levels. The evaluation would be the mechanism that additional road closure or changes in maintenance levels would be developed.
16	I support the wording of section 2.7.2.3, Alternative B, for Directional Signage, but feel very strongly that there needs to be a good, constrained definition of the type, style, and size of directional signs. Therefore, I recommend that the RMP (and the wording here of Alternative B) be supplemented by a subordinate management plan for all signage, and that this subordinate plan be developed with public input.	See decisions SIGN-1, SIGN-2 & SIGN-3. A sign plan will be developed following the adoption of an RMP. The sign plan, and subsequent planning identified through the RMP, will be developed with input from an implementation committee as described in Chapter 9.
17	Of particular concern for the future conservation of the area is increasing ORV use. Alternative A will provide the most protection for the historical, cultural, and spiritual features of the area. Alternative A will provide clear definitions of which areas and roads are designated for ORV use and those areas which are to be protected from their impacts for their natural and historical values.	The Act and the Proposed RMP include closure of 751,879 acres to OHV use and designate 345,969 acres OHV use limited to designated roads and motorized trails. The Proposed RMP also changed the designation and maintenance levels of 132 miles of BLM System Roads to motorized trails maintaining existing road conditions on these segments and reducing the likelihood of future upgrades in road condition.
18	The "cherrystem" road issue. As the roads are identified, there is "no maintenance" language placed upon them. My concern is the "no maintenance" language and given enough time, the identified roads will become unusable. Being unusable, the roads will become closed thus not meeting the intent of wilderness access with the NCA - Wilderness Policy. I ask for an exemption to allow for maintenance of the identified wilderness access roads to insure they are and will remain wilderness access roads. Scrap the "no maintenance" language.	The Final RMP/EIS includes language to address maintenance on wilderness access routes (see decision TRAN-7).

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
19	BLM Should Comply with Section 106 of the NHPA with Designations. BLM should conduct a Section 106 review of areas designated for OHV use, before approving the RMP. Section 106 of the NHPA requires BLM to take into account the effects of its actions on all affected historic resources and to provide the federal Advisory Council on Historic Preservation a reasonable opportunity to comment prior to making its decision. 16 U.S.C. § 470f. With respect to these decisions within the RMP , the regulations state that "[i]t is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations." Id. We believe that designating an area open or limited for OHV use constitutes a sitespecific activity -undertaking, thus triggering Section 106 review before approval.	The area designated as open to OHV use in the Proposed RMP is the playa of the Black Rock Desert and two other small lakebeds. Several small areas of the playa with known cultural values have been designated as closed to OHV use in part because of cultural resource values. Another area was included in the area designated for OHV use only on designated roads and trails to reduce potential impacts to cultural resources. Inventories for other uses of the playa during the past several decades have shown that continuing to manage a large area as open to OHV use would not significantly damage cultural resources.
20	We are also concerned with the Preferred Alternative's upgrade of Stevens Camp to a local road status and Sulfur Jackson Road to Maintenance Level 3.	Decision TRAN-1 in the Proposed RMP does not include upgrading either the Stevens Camp or Sulphur Jackson roads. Maintenance of those roads would continue consistent with past practices and no change in the amount of surface disturbance.
21	Road access to the NCA from main traveled highways over public land should be maintained by the BLM since the increase in traffic over these routes will be caused by the creation of the NCA. The access roads should be well identified and maintained at a level which promotes user safety.	The Proposed RMP adopts a strategy that focuses on maintaining access to current and future vehicle needs in major access corridors including: the High Road, which provides east-west access to the southern portion of the planning area and the playa; the Soldier Meadows Road, Sulphur-Jackson Road and County Road 34 which provide north-south access through and around the planning area; and County Road 8A and the Stevens Camp Road, which provides access at the northwestern portion of the planning area. These roads would include regular maintenance and directional signs, allowing visitors to access all areas of the planning area. The next tier of roads would be designated as motorized trails, maintaining current road conditions in the interior of the planning area. However, as visitor use increases, the functional classification and maintenance levels of motorized trail segments could be changed to protect resources and maintain adequate access with the planning area.
23	The High Road (2048) should be designated as a "Collector" road, with maintenance level 4. The Stevens Camp Road (37017) should be designated as a "Resource" road with maintenance level 3. The road through High Rock Canyon (3702) should be designated as a Trail, with maintenance as appropriate for a Designated Route.	Decisions TRAN-1 and TRAN-3 are consistent with listed concerns for the High Road, the Steven's Camp Road, and High Rock Canyon Road. Portions of the Rabbithole Road in the planning area and the road through Rosebud are Pershing County Roads.

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
	<p>The Rabbithole road (2086) should be designated as a "Designated Route," with appropriate non-maintenance. The road between Sulphur and the road coming out of Rosebud Canyon (going past the Double O mine), which is currently well maintained, should be designated and maintained appropriately so it can be the primary connector between Sulphur and Rosebud Canyon (Seven Troughs Road, Imlay, etc.). All other System Roads identified in the draft tables should be designated and assigned a maintenance level reflecting the level of maintenance they received as of the passage of the act.</p>	
24	<p>I prefer Alternative A which sounds more like adaptive management: "Existing signs would be maintained. New signs would be added where monitoring indicates a need to prevent resource damage or visitor confusion."</p>	<p>Decisions SIGN-1, SIGN-2, SIGN-3 incorporate the ability to change the installation specifications of signage in an adaptive manner.</p>
25	<p>The designation of maintenance categories for the inventories roads for each of the alternatives misses a fundamental point. Each road should be evaluated to determine that each road serves a unique travel purpose.</p>	<p>Decisions TRAN-2, TRAN-3, TRAN-4, and TRAN-8 provide the mechanisms to evaluate individual segments of roads and motorized trails.</p>
27	<p>The NCA Act allows maintenance of existing roads. However, in all the alternatives, only the minimal amount of maintenance (bringing roads up to current standards) is mentioned. There is no assurance road maintenance will be improved with excessive visitor use. Don't folks realize indiscriminate off road driving is "resource damage"? Proper road maintenance can mitigate resource and historical damage while allowing the visiting public to traverse the area without damage to their personal vehicles. Access roads to the Wilderness Areas will also need periodic road maintenance, if the public is to fully enjoy wilderness areas.</p>	<p>The transportation system described in TRAN-1, TRAN-2, TRAN-3, TRAN-4, and TRAN-8 attempts to strike a balance between providing for adequate access and conserving protecting and enhancing the resources, including the setting of the emigrant trails and a wilderness landscape. The system would be designed to provide a series of primary access routes where the roads would be adequately maintained to provide for a wide range of public access combined with many miles of motorized trails where the public could experience solitude, isolation and the challenge of self-discovery. The decisions also provide a process to continually evaluated and adjust the management of the transportation system to meet the future needs for management.</p>
28	<p>A part the technical amendment was written to allow for passage around the Paiute Meadows Ranch. I believe that the plans dealing with passage, both north/south and east/west in that area should be in all the alternatives. The north/south passage is allowed for in the technical amendment in that the wilderness boundary line was drawn back from the eastern side of the Paiute Meadow Ranch to make room for a route.</p>	<p>Decision TRAN-10 provides support for public access on the East side of the Black Rock Range. The specific means for this access would be developed during the implementation phase after consideration of existing and potential routes. Transportation planning would include public participation, site inventories, and appropriate NEPA analysis.</p>
29	<p>Driving vehicles off-road across sagebrush habitats destroys vegetation and biological soil crusts, contributes to soil erosion, and can destroy nests and nestlings. Keep all vehicles on established roads and trails or confined within areas established</p>	<p>Many roads in sagebrush habitats were closed by the Act because they are in designated Wilderness Areas. All other sagebrush habitats would be in portions of the Planning Area designated for vehicle use only on designated</p>

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
	specifically for off-road recreation.	routes as identified in the Proposed RMP in decision OHV-1 and Map 8-3.
30	We were told that transportation decisions needed to be included in this plan, but it alludes “a transportation plan”. I strongly urge you to pursue and develop cooperative agreements with the counties to define “safe”, sensitive trails, appropriate grading to not include prisms and berms and the like.	<p>The proposed RMP will not require an additional Transportation Plan because transportation issues have been adequately addressed.</p> <p>The four BLM System road segments listed in Table 8-1 would include safety considerations during maintenance activities. All other motorized trails in the planning area would remain in their current condition. If resource damage occurs or documented safety concerns are observed on a specific motorized trail decision TRAN-8 would provide guidance to resolve the issue.</p>
31	Limit the number of roads, and reclaim unused roadbeds with sagebrush and native grasses and forbs. This will reduce weed invasion, roadkills, and fragmentation. On remaining roads, use annual weed and fire control to protect adjacent sagebrush habitat.	Decisions TRAN-1, TRAN-3, TRAN-8, and OHV-1 in the Proposed RMP would create limitations on the number of roads and create a process to evaluate road conditions and uses during the life of the RMP. Additional decisions in Section 8.2.8.2 provide guidelines on the protection of sagebrush habitat and noxious weed detection and control.
32	We have general concerns about upgrading roads because of the potential increased visitation and resource damage in sensitive habitats. We also support the closure of roads in the vicinity of the Soldier Meadow Springs Complex. This would reduce degradation of sensitive species habitat within the area. Closing the BLM portions of spur roads that are intermingled with private lands, however, may result in these sections being relocated onto private lands closer to sensitive species habitats. Any closures should be evaluated on a case-by case basis.	The Proposed RMP includes few upgrades to road segments. However the plan does include the ability to change the functional classification or maintenance levels of BLM roads and motorized trail segments when required to protect resource values and maintain adequate access to the planning area. The change in functional classification or maintenance levels includes the opportunity to add, modify or close road segments. This process would include opportunities for public involvement, appropriate levels of NEPA analysis and any necessary consultation to comply with existing law.
33	The need to provide property owners access to their property must be acknowledged. I recommend that the possibility that the RMP specifically include the possibility that roads will be downgraded, as indicated for Alternative A. As regards the Garrett, Trego, and Cholona playa access roads: It is particularly important that the right-of-way for these railroad crossings be obtained (if they do not already exist at this time) and that the crossings be maintained to ensure safety. In particular, I totally support the improvement of the Trego crossing as indicated in all the alternatives. It is very heavily used and needs to be improved. However, I recommend that the Garrett and Cholona be improved beyond the minimal required for safety only if a study of usage of these crossings indicates the necessity. As just stated, I support the road classification	<p>Decisions LAND-1 and LAND-2 acknowledges access to private property and provide mechanisms to obtain permits or rights of way to maintain that access.</p> <p>Decision TRAN-8 was not modified to include the possibility of downgrading roads. However, 132 miles of system roads have been proposed for a change in designation from BLM system road to motorized trail (Decisions TRAN-1 and TRAN-3), which would have a much lower level of maintenance. The Grassy Road and the High Rock Lake road are among those proposed to be designated motorized trails. The remaining BLM</p>

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
	identified for Alternative B.	<p>system roads are considered the minimum necessary to provide effective access to the area and would not be suitable to downgrade in functional class or maintenance level. Decisions TRAN-1 and CRM-3 provide for some closures of Class C trail segments and limit maintenance of other segments.</p> <p>After the publication of the Draft EIS/RMP a working group consisting of BLM specialists, Railroad officials, County Road Departments, and NDOT officials was formed to consider issues of railroad crossing safety and public access to the planning area. The proposed RMP includes the recommendations of this group in decision TRAN-5. In the proposed RMP the existing railroad crossings would be closed and one new, improved crossing would be created. This decision provides the required sight distance for public rail crossings, improves the quality of the access to standards, but reduces the number of access points.</p>
34	Protect the important resources of High Rock Canyon from OHV use. Maintain opportunities for visitors to experience the Emigrant Trail in the Canyon.	In order to avoid travel during inappropriate seasonal conditions, Decision ACEC-3 provides a seasonal OHV closure of High Rock Canyon. Travel in High Rock Canyon is permitted on designated routes during the remainder of the year to provide opportunities for the public to experience the terrain, sights, and conditions of the Emigrant Trail.
35	In general, roads should be kept at their present maintenance level. Developing higher speed roads only promotes more traffic and detracts from the primitive experience which encourages self-reliance and safety in navigating the remote roads within NCA. Navigating the unimproved roads contributes to the feeling people have of the "primitive character" of the area, and that the challenge of driving on those roads enhances the feeling of the "emigrant experience" and a sense of self-reliance to be gained by following the trail. The reality and sense of the primitive would be destroyed by being able to drive on "good" roads. To be able to maintain the area in the setting unaltered from the days the emigrant wagons traveled there and to "preserve opportunities for ... primitive experiences" one must accept the risk of diminished safety and inconveniences attendant upon unimproved roads. Improvement of interior roads within the NCA should be done only when absolutely necessary; roads should not be improved for the convenience of the traveler.	Decision TRAN-1, TRAN-2, and TRAN-3 in the Proposed RMP provide that only a few BLM System Roads, described in Table 8-1, would receive regularly scheduled maintenance. These roads currently are maintained by BLM, provide the primary access for administration, recreational use and landowners. Continuing to manage these roads to provide primary access would require no additional surface disturbance. All other vehicle access routes managed by BLM would be designated as motorized trails. Motorized trails are low standard, unimproved vehicle routes, often two tracks requiring high clearance vehicles and 4-WD. Within the Planning Area, motorized trails would include the wilderness access routes and boundary roads. They are usually maintained by the continued passage of vehicles. When conditions require additional maintenance, maintenance would be applied to the minimum degree necessary to prevent resource damage while allowing the trail to remain open to vehicle use.

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
36	Roads should only be maintained at their current maintenance levels to preserve the primitive experience of the NCA. Adequate public access to the area needs to be preserved. It is important to protect the Emigrant Trail from disturbance due to road maintenance activities.	Decisions TRAN-1 and CRM-3 provide for some closures of Class C trail segments and limit maintenance of other segments. TRAN-2 and TRAN-3 provide guidance for the maintenance of low standard roads. Any new surface disturbance associated with road maintenance would require an appropriate level of NEPA analysis and public input.
37	We support the functional categories for the roads with a few exceptions. We feel very strongly that the BLM should clearly identify in their transportation plan and maps ALL roads segments that are also historic trail segments. These historic sections of the trail need to be kept in as rustic condition as possible. They should NOT be bladed, graded etc. regardless of the functional category or ownership of the road if at all possible. Perhaps the Winnemucca BLM should create a special road category for these trail segments. As the recent incident with Pershing County road department illustrates, there could be more sensitivity by the county and BLM road departments on the appearance of these trail segments. While we understand that in this instance the road had been graded in the past, maintaining the appearance of older two tracks is important for visitors. We would further recommend that the BLM update/amend their MOUs with the various counties road departments to increase understanding and sensitivity on this issue. We also want to see more guidance in the final plan for the management direction on maintenance within the planning area. Nearly all of the functional categories allow for a higher level of maintenance than is practical or desirable on the ground. We do not want wholesale grading of the Category 2 or 3 roads. We would like written guidance in the plan that roads will be repaired only in the specific locations where a problem occurs (examples would include placement of a culvert, fixing a portion of a road where it has become marginally possible and new user created trails are being pioneered around the rough or eroded sections).	See decisions CRM-3 and Maps 8-2a-f.
38	Road upgrades would decrease safety, increase numbers and speed of vehicles and increase weed infestations and incidence of fire. We oppose any upgrading of existing roads or construction of new roads. Even current maintenance, particularly in the Washoe County portion of the NCA, increases the likelihood of serious accidents by making it possible for vehicles to travel at high speeds on gravel roads. There is much less likelihood of accidents for vehicles traveling at slow speeds because of poorly maintained roads. In addition, road maintenance and improvement create vectors for noxious weeds, which are seen to be growing and increasing along all regularly maintained roads. You have not adequately addressed or assessed these issues. We support road closures if impacts to resources are determined by monitoring. We support limiting visitor numbers. But we do not support any road improvement or	Upgrades to roads changes potential safety issues from those associated with hazards, including becoming stuck, breakdowns due impacts with objects in the roadway or sliding from the roadway in wet conditions, to those associated with increased drivability, including loss of traction or collisions with other vehicles. The transportation system in the proposed RMP would result in few immediate changes in the condition of road surfaces that would maintain the current safety situation for drivers and their vehicles.

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
	construction.	
39	Where an existing Class C emigrant trail (OCTA Class 2) is used by vehicles to follow the trail, this type of road should be maintained as a Resource Road (Maintenance Level 2) and definitely not improved. Road maintenance should be at a level consistent with keeping this kind of road open to high-clearance 4WD vehicles. There should be no road improvements involving blading and grading without an environmental assessment and public input.	<p>Decisions TRAN-1 and CRM-3 provide for some closures of Class C trail segments and limit maintenance of other segments.</p> <p>TRAN-2 and TRAN-3 provide guidance for the maintenance of low standard roads.</p> <p>Any new surface disturbance associated with road maintenance would require an appropriate level of NEPA analysis and public input.</p>
40	Objective 1 states, "To provide a transportation network for effective access, consistent with the Act, public safety, and resource objectives". The current characteristics of the roads in the NCA play a significant role in providing a "wilderness experience" to visitors. Upgrading roads would detract from that experience and preclude realizing the stated objective. No roads should be upgraded. The current conditions of roads do not meet the stated maintenance levels for their current classifications. Bringing these roads up to these levels would be tantamount to an upgrade. Re-evaluate the classification of these roads to match their current maintenance level (and reality).	<p>Decisions TRAN-1, TRAN-2 and TRAN-3 in the proposed RMP would create a transportation system that focuses on maintaining access to current and future vehicle needs in major access corridors including: the High Road, which provides east-west access to the southern portion of the planning area and the playa; the Soldier Meadows Road, Sulphur-Jackson Road and County Road 34 which provide north-south access through and around the planning area; and County Road 8A and the Stevens Camp Road, which provides access at the northwestern portion of the planning area. These roads would include regular maintenance and directional signs, allowing visitors to access all areas of the planning area. The next tier of roads would be designated as motorized trails, maintaining current road conditions in the interior of the planning area. However, as visitor use increases, the functional classification and maintenance levels of motorized trail segments could be changed to protect resources and maintain adequate access with the planning area.</p>
41	The DEIS supports	<p>The enabling legislation provided for continuing access to users of the area. However the Act also required that OHV use be confined to designated roads and trails or others designated for vehicle use. The OHV decision contained in the Proposed RMP includes area designation for OHV use that includes a mix of open, closed and limited areas. The route designation is similar to that found in Alternative C.</p>
42	Why are the mountain roads closed off? One example is of this is "Franks Road", the road that runs along the high ridge line of High Rock Canyon through the head of Yellow Rock Canyon was built long with mechanized equipment long before the BLM was created. This road was used for 50 years by visitors to the area is a beautiful view	<p>The "mountain roads" you are referring to are closed in those areas because they are within designated wilderness. Roads must be closed and mechanized, motorized travel is not permitted in any wilderness areas per the Wilderness Act of 1964. They will not be reopened through selection of</p>

Appendix N: Comments and Responses

Transportation and OHV Routes

Section 2: Comment Summaries and Responses

#	Comment	Response
	of High Rock Canyon.	the No Action Alternative.
43	Section 3.2 states, "...the Act mandates that the RMP...provide appropriate signage." I have read the Act a number of times and have been unable to find any language that might be construed as a mandate in this regard.	Section 3.2 has been modified to clarify the language related to signs. Section 3.1 has been modified to better reflect the condition of many segments of BLM System Roads.
44	Alternative C is recommended. It has the most roads remaining open and the least change and restriction placed on the user. If Alternative B is chosen the	None of the road segments discussed in the comment would be closed in the Proposed RMP. Decision TRAN-9 provides for easement acquisition or the relocation of roads or trails that cross private land.

Appendix N: Comments and Responses

Cultural Resources (including emigrant trails) **Section 2: Comment Summaries and Responses**

#	<i>Comment</i>	<i>Response</i>
45	<p>A key to the management of the NCA has to be preserving the emigrant trail experience, its history, and the visitor's experience of that unique resource. Criteria should be established for evaluating trail traces on which to base conservation measures, to inventory the trail, and to manage the trail viewsheds to retain the setting experienced by the emigrants. Unfortunately, some of the proposed management directions in various alternatives threaten that experience with road upgrades, increased signage, lower VRM standards, and development of recreational facilities.</p>	<p>Criteria have been developed for evaluating trail remnants, inventorying and evaluating cultural resources, and viewshed management. The proposed road upgrades, signage and facilities are designed to reduce the impacts to cultural and natural resources that are already occurring through the current visitation levels. Without these developments and upgrades, there is a real danger that cultural resources will be lost.</p>
46	<p>The EIS lacks any discussion of how adverse effects to historic properties will potentially be resolved through the Section 106 process. Assuming this is the</p>	<p>BLM will not be exempted from its Sec. 106 responsibilities just because a land use plan was prepared and an alternative selected. Compliance with NHPA, NAGPRA, ARPA, and other related cultural resource laws and regulations, is common to all alternatives. No significant impacts are identified because the area is designated as National Conservation Area and wilderness, with many of the most severe potential impacts removed through legislation, and because other adverse effects will be taken care of through Sec. 106 consultation based mitigation as needed.</p>
47	<p>How will this identification and categorization process take place? For instance, how much of the historic trail system in the NCA has been identified, meaning recorded, to date (ie., 10 percent? 50 percent)? Will only those resources known to date be categorized, or will additional inventory be conducted? Please quantify the level of additional inventory to be conducted and provide an approximate schedule for these data to be collected. Please integrate the proposed identification and classification of cultural resources with National Register eligibility and listing of historic properties. Additionally, please explain to what extent the Nevada State Historic Preservation Officer will be involved in the process of identifying and categorizing NCA cultural resources for ongoing management.</p>	<p>The identification and categorization process will occur through Sec. 106 and Sec. 110 cultural resource inventories. Although the Applegate Trail was placed on the National Register of Historic Places in 1977, very little of the trail was recorded at that time. Since then, Peggy McGuckian traced the route through lands administered out of the Winnemucca Field Office, and OCTA trail mapper Don Buck has mapped roughly 80% of the trail. Additional inventory will be conducted, and new resources will be classified. Less than four percent of the planning area has been inventoried. Inventory efforts will be based on available funding and will often utilize the volunteer efforts of interested persons and groups. No meaningful schedule can be provided at this time. Sites found to be eligible for the National Register will be placed in a category other than Discharged from Use. Non-eligible sites may or may not be placed in the Discharged from Use category, depending on the needs of the NCA. For example, a heavily vandalized emigrant glyph that no longer meets the integrity requirements for eligibility might be placed in the Experimental Use category and used in an effort to determine the best spray paint removal method. Normal Sec. 106 and Sec. 110 consultation will proceed through the Nevada State Historic Preservation Officer under the terms of the State Protocol Agreement and other applicable laws and regulations.</p>

Appendix N: Comments and Responses

Cultural Resources (including emigrant trails) **Section 2: Comment Summaries and Responses**

#	<i>Comment</i>	<i>Response</i>
48	Interpretation of cultural sites must be kept to a minimum and as unobtrusive as possible. Best to provide interpretive literature and safety information at visitor centers outside the NCA, appropriate private facilities, and at the NCA entry portals, all of which keep the NCA as visually pristine as possible. Any additional on-site signage, beyond what presently exists, must be avoided.	A Cultural Resource Management Plan will be prepared for the planning area. The majority of site interpretation will be through literature distributed to the public at visitor centers, etc. Signs will be used in very rare cases, if at all.
49	Increased damage and vandalism occurs with more people and their vehicles. The rock writing in lower High Rock Canyon has been disfigured by shotgun blasts, and many of the caves and rock shelters in the area have been trashed and looted. More vehicles and OHV traffic without the necessary law enforcement inevitably leads to more irreversible damage. Additional law enforcement and monitoring needs to be proactive instead of reacting to increases in looting of area sites, and should be a component of increased visitation and road improvement. The flexibility to respond to resource degradation from increased visitation needs to be tied to the expenditure of funds to ensure the long-term preservation of segments of the trail and other resources.	The BLM has hired two new Law Enforcement Rangers (one in Cedarville and one in Winnemucca), a staff archaeologist for the NCA, and a backcountry ranger to increase our presence in the NCA, monitor sites, and to curtail looting.
50	Careless fire suppression can do considerable damage to remnants of the emigrant trails. The locations of the emigrant trails need to be communicated to the agencies involved in fire suppression. The need to be least disruptive and avoid damage to these sites needs to be emphasized and incorporated into their mandate.	A fire management plan will be prepared that will take in account protection of cultural resources, including the Applegate Trail and Nobles Route. Appendix K has been modified to include specific criteria for use of heavy equipment on emigrant trail segments during fire suppression activities.
51	BLM should prescribe adequate buffer zones to control activities having visual and physical effects on the Emigrant Trails. Although Appendix G and the corresponding maps for each Alternative classify the trail segments, it is unclear what prescriptive mechanisms are necessary to prevent against activities that will impact the integrity of the Emigrant Trails. BLM should discuss, and provide, adequate buffer zones for the Emigrant Trails.	"Buffer zones" for the emigrant trails are provided for in the Proposed RMP through the Visual Resource Management (VRM) classifications. All wilderness areas will be VRM Class I (no new developments), with the remainder of the NCA areas with historic trails classified as VRM Class II (developments will be substantially unnoticeable). Wyoming BLM has used this approach with good effect in protecting California historic trail segments in active oil and gas fields. The NCA designation itself also provides a level of additional protection to the trail's setting by withdrawing the majority of the NCA from mineral entry and leasing and other development activities. California historic trail segments in active oil and gas fields. The NCA designation itself also provides a level of additional protection to the trail's setting by withdrawing the majority of the NCA from mineral entry and leasing and other development activities.
52	Section 110 of the NHPA instructs BLM to identify, evaluate, and nominate historic properties to the National Register of Historic Places, as well as protect these properties. Although costly and time-consuming, BLM needs to inventory cultural	BLM recognizes the need to undertake cultural resource inventories of large areas as discussed in the common to all alternatives section 2.4.3.2 and RMP decisions CRM-1, CRM-4, and CRM-5. The plan states that an historic

Appendix N: Comments and Responses

Cultural Resources (including emigrant trails) **Section 2: Comment Summaries and Responses**

#	<i>Comment</i>	<i>Response</i>
	resources in the Black Rock High Rock NCA to determine what cultural resources exist for future management decisions and protect the emigrant trail. Inventorying should be the foremost and unceasing priority that is immediately funded and adequately staffed so as to accomplish this goal in the shortest time possible. Possibly, knowledgeable individuals and organizations with direct interests in the NCA could be utilized as volunteers to assist in bringing about such a cultural resource inventory. BLM cannot properly establish a management framework in this Draft to protect the trails and resources without completely understanding what cultural resources exist.	context and research design will be written and that additional Section 110 inventory will be conducted in the planning area. In addition, BLM would encourage scientific research in inventories in the proposed plan as described in appendix M (decision CRM-7). Volunteers from organizations with direct interests in the NCA are currently being used to inventory cultural resources, and will be utilized in such a manner in the future. New sites identified will be classified and evaluated for their NRHP eligibility, and protected accordingly.
54	In section 2.4.3.2 putting in parallel hiking paths or driving roads to supposedly protect trail segments from use would lead to the degradation of the surrounding environment and inevitably impact the viewshed.	Any parallel routes created to divert traffic from Emigrant Trail traces will be outside the immediate viewshed of the trail and will be constructed in such a manner as to minimize degradation of the surrounding environment.
55	I recommend that Site Conservation be emphasized for Class A and Class B segments of the historic trail and other cultural sites not on commonly used visitor routes. Public Use should be emphasized for other classes of historic trail segments and cultural sites found on commonly used visitor routes. I strongly recommend that interpretation of cultural sites be handled through literature made available at visitor centers, appropriate private facilities and locations, and at the NCA portals rather than through on-site signage. Special protection should be given to Coyote Springs, perhaps by designating the area as Closed to OHVs or by restricting camping to a designated site. The road leading from the trail segment east of the "descent into fly canyon" toward Soldiers Meadows Ranch must be recognized as a historic road associated with Camp McGary, and protected as such.	The proposed plan will designate Class A and most Class B segments as Conserved for Future use, while other commonly used segments will be Public Use. Use of literature instead of signage is also in the preferred alternative. Steps are being made to protect the Coyote Springs area, such as designating it closed to OHV. Identification of other historic roads and routes throughout the NCA will be an ongoing process, with appropriate classification of these segments.
57	The official National Park Service brochure/map for the California National Historic Trail accurately names the emigrant trail within the NCA as the " Applegate Trail or Southern Road to Oregon." It would be a disservice to the public if this incorrect hyphenated trail name is disseminated through BLM brochures and maps	An attempt to remove -Lassen from the Applegate trail has been made, although isolated cases may still show up throughout the document.
58	THE RMP SHOULD INCLUDE SPECIFIC STEPS TO PROTECT AND MANAGE THE CULTURAL, HISTORICAL, AND PALEONTOLOGICAL RESOURCES IN THE BLACK ROCK HIGH ROCK NCA AS NATIONAL TREASURES. BLM's identification, evaluation, and assessment of adverse impacts on cultural, historic, and paleontological resources within each alternative of the Black Rock-High Rock NCA is inadequate.	RMPs provide broad direction for management. Additional site-specific planning is required to implement this direction. Specific steps to protect and manage cultural and paleontological resources in the planning area will be outlined in the forth coming Cultural Resources Management Plan.

Appendix N: Comments and Responses

Cultural Resources (including emigrant trails) Section 2: Comment Summaries and Responses

#	Comment	Response
59	<p>It is not clear if Antelope Springs has been included within the NCA boundaries. These springs are among the most historically significant sites on the emigrant trail and all efforts should be made to bring them under the protection of the NCA.</p>	<p>Antelope Springs is not included within the NCA boundaries. It is located on private property outside of the NCA boundaries, and the BLM has no jurisdiction concerning its management. The NCA legislation dictates that the BLM can only acquire private property if a "willing seller" offers it. If the current landowner approaches the BLM, every effort will be made to acquire these springs although they will still be outside the NCA boundary.</p>
60	<p>Inadequate Examination of Cumulative Impacts on Cultural and Historic Resources. Extending from the issues addressed above, we find BLM's required examination of cumulative impacts on cultural and historic resources inadequate to assess the impacts of designated activities. We recognize that evaluating cumulative impacts on cultural and historic resources is difficult, especially given that only 2 percent of the plan area has been surveyed. We find BLM's required examination of cumulative impacts on cultural and historic resources inadequate to assess the impacts of designated activities. We recognize that evaluating cumulative impacts on cultural and historic resources is difficult, especially given that only 2 percent of the plan area has been surveyed. RMP at 4-3. Nevertheless, the Federal Land Policy and Management Act (FLPMA) and the National Environmental Policy Act (NEPA) require BLM to evaluate the cumulative impacts on cultural and historic resources. BLM's final RMP should examine in greater detail the cumulative impacts on cultural and historic resources.</p>	<p>Please keep in mind that the planning area is mostly National Conservation Area or wilderness-designations that curtail the variety of impacts that could occur to cultural resources. The BLM's role in cultural resource management is a continuous one, and Sec. 106 inventory, mitigation, analyses, etc. will take place as needed. Additional inventory and monitoring efforts are planned for the planning area. The plan allows for site classification as new sites are discovered. Reclassification will protect sites by placing them into the category that will allow optimal management. Many impacts that cultural resources might receive will not be an issue with the designation of National Conservation Area or wilderness. Increased visitation and potential vandalism will be addressed with additional law enforcement and cultural resource management staff.</p>
61	<p>I would insist that a Cultural Resources Management Plan (CRMP) be prepared specific to NCA historic wagon trails and their associated features (eg. graves, campsites, inscribed rocks). This plan should identify thresholds of "effects" upon various characteristics of the trails (its swale, its features, and its viewshed) and establish standard operating procedures from which BLM could then develop appropriate management strategies for the overall NCA. The need for this step is obvious; with an adequately prepared CRMP the BLM would not be so quick to consider management alternatives that involve random new development within the viewshed of the historic trail system.</p>	<p>A CRMP for the planning area would be developed during implementation of the Plan, which will include a section on trail related resources. New developments would require site-specific cultural, as well as other inventories and a completion of appropriate NEPA analysis before construction.</p>
62	<p>Discussion of Section 110 of the NHPA is Inadequate. BLM's management objective for cultural resources, and Native American values -to protect their</p>	<p>While conducting Sec. 110 inventory of the planning area prior to writing and implementing a RMP would be desirable, the BLM is under a Congressionally mandated deadline to complete the plan by December of this year. Funding for the plan did not include any provisions for completing Sec. 110 inventory. The proposed RMP does make provisions for</p>

Appendix N: Comments and Responses

Cultural Resources (including emigrant trails) **Section 2: Comment Summaries and Responses**

#	Comment	Response
		completing additional Sec. 110 inventory as funding allows, and prioritizes the areas where inventory will take place.
63	BLM should integrate President Bush' s recent Executive Order 13287, entitled "Preserve America," into the final RMP/EIS. The Executive Order requires each Federal agency to "prepare an assessment of the current status of its inventory of historic properties," expanding on the requirement found in section 110(a)(2) of the NHPA. Exec. Order 13287 § 3; see 16 U.S.C. § 470(h)-2(a)(2). It also requires each agency to "ensure that the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties."	Executive Order 13287 has been incorporate into Appendix A as one of the constraints for management of the planning area.
64	BLM should examine in detail the potential cumulative impacts on cultural and historic resources for areas designated as open for OHV use. Attempt to mitigate adverse effects associated with OHV designated areas within the RMP. This should include providing methods to prevent degradation of known, and unknown, cultural and historic sites. BLM should also provide for adequate enforcement to control looting and vandalism.	<p>The BLM has taken into account OHV use on cultural resources. Currently, the majority of the non-wilderness portion of the planning area is classified as open to OHV use. The plan will be restricting or closing much of the currently open areas, with only portions the Black Rock Desert playa remaining open. The playa is a large, flat, dry lakebed with few cultural resources of any kind. Much of the planning area's inventory took place on the playa surface years ago due to proposed geothermal development, and the majority of the artifacts found are pieces of debitage near the shorelines and are out of primary context or widely scattered cartridge casings and bullets dating to the time when the area was a naval air gunnery range. These isolated artifacts have little research or cultural values. Areas where significant cultural resources have been identified on the playa are classified for OHV traffic as restricted to existing routes or closed.</p> <p>The BLM has hired two new Law Enforcement Rangers (one in Cedarville and one in Winnemucca), a staff archaeologist for the NCA, and a backcountry ranger to increase our presence in the NCA, monitor sites, and to curtail looting.</p>
65	<p>ONLY those cultural resource sites that are currently receiving high public visitation and demonstrate a need for protection, should be managed for public use.</p> <p>* Inventorying and monitoring should be on-going process and needs to be mentioned. There is SO much we don't know about the cultural and scientific resources within the NCA. Systematic studies should be a top priority.</p>	<p>The plan specifies that sites heavily visited or damaged be managed for public use. For example, the pristine Emigrant Trail traces are placed in the Conservation or Conservation/Scientific categories, while traces that are commonly traversed by motorized vehicles, are placed in the Public Use category.</p> <p>Systematic inventory of the NCA is proposed in the plan, with high visitation areas given a priority. Monitoring of key resources is also proposed.</p>

Appendix N: Comments and Responses

Cultural Resources (including emigrant trails) **Section 2: Comment Summaries and Responses**

#	Comment	Response
66	Keeping the emigrant trails as near to their original condition, both visually and physically, as humanly possible, consistent with allowing visitors to see, experience, follow, and enjoy the original environment and trails.	The Proposed RMP would restrict impacts to the pristine trail segments while allowing for continued touring along trail segments that are converted to 2-track or county roads. The setting of the trail would be preserved through VRM designations of Class I in wilderness and Class II in the remainder of the planning area, shown on Map 8-9.
68	The RMP fails to provide an assessment of what sites are present within the area, and how the sites will be adversely affected by designated activities. The RMP simply states that cultural resources, Native American values, and Paleontological resources will suffer "decreased integrity due to road improvements, fire, rehabilitation projects, grazing, wild horse & burro presence, and mineral entry." dRMP at ES-8-10. We strongly encourage BLM to integrate its stewardship responsibilities into the RMP, in accordance with Section 110 of the NHPA.	Your comment correctly pointed out that BLM lacks adequate inventory of the planning area. BLM feels, however, that the inventory already acquired, coupled with the historic record, gives a good indication of the range of cultural resources in the area. BLM also created the RMP to be flexible enough to adequately deal with any new sites, or new site types, as they are encountered. Please keep in mind that the planning area is mostly National Conservation Area or wilderness-designations that curtail the variety of impacts that could occur to cultural resources. BLM's role in cultural resource management is a continuous one, and Section 106 and 110 inventories and active site management will not cease just because a plan is written and an alternative selected.

Appendix N: Comments and Responses

Native American Values

Section 2: Comment Summaries and Responses

#	Comment	Response
69	BLM should clarify protective management measures for identified Traditional Cultural Properties.	When Properties of Cultural and Religious and Importance are identified, they will be placed in a Traditional Use or Traditional Use/Scientific category. A Traditional Use category allows for traditional uses with which it is identified, and would curtail other uses that would conflict with that use; for example, Christmas tree cutting in a traditional pinyon nut gathering area would not be allowed. A Traditional Use/Scientific category would allow limited scientific research as long as it does not interfere with traditional uses and adequate consultation has been undertaken. More details will be available in the Cultural Resource Management Plan.
70	We are concerned with BLM's Native American tribal consultation, as is required under FLPMA, NEPA, NHPA, and other policies and procedures. Although many tribes were contacted, which we find commendable. it is unclear whether further consultation lead to the protection of traditional religious and cultural properties. Further, it is unclear whether management mechanisms have been constructed to protect these areas. We recommend that BLM clarify its consultation with interested Native American tribes, as well as identify proactive measures to ensure protection of traditional cultural properties and provide access to such properties.	The BLM is very aware of its Native American consultation responsibilities and has made, and continues to make, every effort to involve tribal governments and members in the planning process. BLM has met with representatives of 7 Tribes and the proposed RMP incorporates suggestions made in those meetings.
71	It must be recognized that every water source in the NCA is of cultural interest and of ethnographic interest. It would be more appropriate that these sites be managed under the Traditional/Scientific Use category rather than the Traditional Use category. Traditional Use would prevail if there arose a conflict with Scientific Use and would allow for ethnographic and cultural studies. No fencing, road closures, etc. should be initiated without meeting the additional stipulation that they could only occur after a period of site monitoring and analysis concluded that the action was necessary in order to protect the resource.	The BLM recognizes that water sources are important to Native Americans. The proposed RMP would place several categories of these sites in the Traditional/Scientific Use category.

Appendix N: Comments and Responses

Paleontological Resources

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
72	Vertebrate fossils are rare and should be off-limits to casual users so they can be placed in context to interpret past conditions. Large scale collection of petrified wood quickly depletes the resource, but casual collection should continue to be permitted.	Current laws and regulations protect vertebrate fossils, and these will continue to be enforced.
73	*Common to all in Paleontological Resources mentions managing them to "facilitate educational and recreational needs". I need this further clarified.	Facilitating educational needs means assisting permitted paleontologists with research efforts. This assistance would range from providing an excavation permit up to providing matching funds or supplies. It would also mean encouraging the publication of their results, both in academic and public venues. It does not mean on-site interpretation, unless something very rare and of importance to the entire nation is found.

Appendix N: Comments and Responses

Wilderness

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
74	Proposed road closures and recreational changes to the ISA portions of the RMP should be handled in a separate document. In many cases it is easy to confuse NCA management proposals for the ISA portions. Management changes proposed for these areas are in question with regard to pending legal decisions. As such, these complex management decisions should receive the full wait of Winnemucca Field Office RMP planning proposed to commence following the completion of the Black Rock RMP.	Because of the proximity to the NCA, and the need to make decisions on several unresolved issues, the Lahontan Cutthroat Trout Area was included in the planning process. This does not imply that the NCA legislation applies to this area.
75	Many comments indicated a lack of support for the "natural" and "wild" emphasis zones in Wilderness as described in Alternative C of the Draft EIS/RMP.	The "natural" and "wild" emphasis zones proposed in alternative C of the Draft Plan are not being use in the proposed RMP.
76	We believe the goals and objectives of wildlife management within Wilderness Areas should focus on native species and natural population dynamics. As a result we recommend against the creation or maintenance of artificially constructed wildlife water developments in Wilderness Areas, except where they are necessary to recover listed species.	It is BLM's policy that wildlife management in wilderness focus on natural population dynamics. Active management of the these areas is allowed for in the Wilderness Act when the action is proven to be the minimum required action necessary for the management of the area as wilderness. Generally active management in wilderness areas will only occur to mitigate a human caused impact such as invasive weeds, or loss of habitat.
77	Wilderness Study Area Designations. The Sierra Club supports Alt A, adding all 10 acquired parcels to the Lahontan Cutthroat Trout WSA, leaving two access routes open and closing; the area seasonally to motor vehicles during the spawning season of LCT (February through June). The Sierra Club objects to the proposed construction of a developed campground (Alt. C) in the heart of the area	Due to a recent court settlement, BLM's authority to designate new WSAs has expired. However, wilderness values continue to be an important part of BLM's multiple use mandate and BLM may continue to protect areas with wilderness characteristics and identify management prescriptions needed to accomplish this. Decision LCT Area-1 in the Wilderness Section outlines management for areas with wilderness character in the Lahontan Cutthroat Area.
78	Several comments indicated support for the maintenance and construction of wildlife water sources within Wilderness. Other commentors preferred that only the existing wildlife water developments be maintained, or in some cases decommissioned.	The existing constructed wildlife water sources will be maintained as stated in Decision FW-10 of the section 8.2.12.2 of the proposed RMP. Construction of new wildlife projects will be authorized in wilderness if they meet the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964.
79	Page 3-14.3.6.2: We recommend including language explaining that the LCT population that inhabits the Mahogany Creek watershed is one of only two self-sustaining lacustrine populations, and is genetically pure.	A paragraph including the suggested information on LCT has been added to Chapter 3.
80	Page 3-16.3.6.2.1: Currently, LCT is listed as threatened under the Endangered Species Act of 1973, as amended, not endangered.	The suggested change has been made.

Appendix N: Comments and Responses

Wilderness

Section 2: Comment Summaries and Responses

#	Comment	Response
81	Negotiated language authorizing continued maintenance and construction of water developments in much of the Wilderness and NCA is listed as a preferred alternative in the draft RMP. The "preferred" alternatives presented to the NCA/RAC planning group on June 2,3 recognized the jurisdictional issues with regard to wildlife management and water development. Specifically, the following language was presented and adopted by the RAC. 2.7.12.2.1 Wildlife Water developments "Existing Wildlife related projects, including water developments in the NCA and Wilderness would be repaired, maintained, and reconstructed. Inspection of projects would be completed regularly to minimize the amount of maintenance and reconstruction required. Maintenance activities would be conducted as needed, and maintenance of projects in Wilderness would be conducted using methods consistent with minimum tool analysis. These methods could include access by helicopter as well as non-mechanized means. New water developments or other wildlife-related projects could be constructed when the project would promote healthy, viable, and more naturally distributed wildlife populations and would enhance wilderness values; was required to preserve wilderness values; or was required to correct unnatural wildlife habitat conditions caused by human actions. Any projects constructed would be designed to minimize visual impacts." This NCA/RAC consensus language should be carried forward into the final decision. To defer, the decisions authorizing such activities negotiated in the "public planning process" will understandably violate a "public trust" for those who have been assured from the inception that negotiated "consensus" would matter.	The language in the proposed RMP is a direct result of consensus language from the RAC subgroup.
82	The Sierra Club supports signing wilderness boundaries as frequently as needed, but strongly supports the development of excellent maps by the BLM showing the boundaries and access routes as equally important to inform visitors. In addition, BLM should commit to enforcing the boundaries against vehicular trespass, especially on high use summer weekends and during special events on the playa.	The language in the proposed plan in decision WILD-3 for wilderness signing has been adjusted to reflect an adaptive management approach. BLM has also prepared maps of individual wilderness areas and has made them available to the public, so that they may more easily locate the boundaries. Additional law enforcement officers have been added to the NCA staff to enforce wilderness regulations.
83	We do not need any kind of permit system with the amount of wilderness use anticipated.	A wilderness permit system will not be implemented. BLM has provided detailed maps showing the wilderness boundaries to users of the area.
84	The final plan should authorize the established use of gas and/or electrical equipment and motorized vehicles, including aircraft, to survey, capture, transplant and monitor wildlife populations, provide for repair, maintenance, and reconstruction of existing wildlife water developments, and for the installation of new water developments. New water developments and other wildlife management structures shall be constructed	We have added specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. We are committed to working closely with NDOW in the future in order to effectively manage wildlife populations and habitats and are confident that any future

Appendix N: Comments and Responses

Wilderness

Section 2: Comment Summaries and Responses

#	Comment	Response
	within designated wilderness when: 1. The action will enhance wilderness values by promoting healthy, viable, and more naturally distributed wildlife populations. 2. Care is taken to construct and maintain projects that minimize visual impacts	required site-specific analysis can be completed in a timely manner. Use of aircraft for population surveys is addressed in decisions FW-2 and FW-7 of the Wildlife Section. Maintenance of existing wildlife waters will continue as outlined in Decision FW-10 of the Wildlife Section. Capturing and transplanting of native species and construction of new wildlife projects will be authorized in wilderness if they meet the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964 (Decision FW-8).
85	We do not fully understand the process involved in determining "methods consistent with minimum tool analysis". It appears as though a wide range of tools are available, but each case may have to be reviewed to determine how the maintenance or construction of new units can take place.	See Appendix F for an explanation of the "minimum required/tool analysis" that must be completed for projects proposed for wilderness areas.
86	1) Wilderness Areas - the rule for sign spacing should be = only as many as it takes to prevent the public from inadvertently breaking the law by trespass . Putting them in at every mile or ½ mile seems arbitrary to me . 2) WSA Designation -- Alt. A offers the best protection for the LCT habitat. This area currently demonstrates a need for this change (seasonal closure and closure of some routes) in order to protect its wilderness qualities and the LCT habitat . In addition , there is no mention of the need to armor stream crossings.	The language in the proposed plan in decision Wild-3 for wilderness signing has been adjusted to reflect an adaptive management approach. BLM has also prepared maps of individual wilderness areas and has made them available to the public, so that they may more easily locate the boundaries. Additional law enforcement officers have been added to the NCA staff to enforce wilderness regulations. Due to a recent court settlement, BLM's authority to designate new WSAs has expired. However, wilderness values continue to be an important part of BLM's multiple use mandate and BLM may continue to protect areas with wilderness characteristics and identify management prescriptions needed to accomplish this. Decision 40 in the Wilderness Section outlines management for areas with wilderness character in the Lahontan Cutthroat Area.
87	Any cherry stems in the Wilderness that are not specifically guaranteed to be kept open in the legislation should be closed. Vehicle use on such roads violates Wilderness character and recreation in Wilderness should be designed for those who are dependent on Wilderness Areas to find the solitude and primitive recreation for which they are designated.	Wilderness Areas are closed to motor vehicle use. The 33 "cherry-stems" or "vehicle access routes" that were left open to vehicles by Congress are not within the wilderness boundaries.
88	I support the Draft's Alternative B as regards the designated wilderness areas. I recommend that the BLM weigh heavily the opinions of the Summit Lake Paiute Indian	The Summit Lake Paiute Tribe has been consulted throughout the planning process and their comments have been incorporated into the proposed

Appendix N: Comments and Responses

Wilderness

Section 2: Comment Summaries and Responses

#	Comment	Response
	Tribe as regards the LCT WSA components of the RMP.	RMP.
89	In general, this DEIS seems terribly lacking in its discussion of monitoring. In the Wilderness it is especially important to inventory the existing conditions and establish the limits of acceptable change that BLM will allow before specific actions are triggered to mitigate for this. BLM guidance requires this.	A section on monitoring has been added to the Proposed RMP (See Chapter 9). The Wilderness Management Plan that will be prepared after the Resource Management Plan will outline specific monitoring procedures.
90	During preparation of wilderness management plans, we expect BLM to respect existing and future access needs to water sources for private use. This may include the use of motorized vehicles without prior notice to BLM. Nothing in the language of the enacting legislation requires BLM to prohibit or limit this type of access, especially since ongoing motorized access occurred prior to enactment.	BLM will continue to honor valid existing rights in the wilderness areas, while minimizing their impacts on the wilderness resource.
91	The RMP is somewhat obscure regarding Nevada's authority to conduct management-based activities within the area. Those activities and the protocol for the same should be outlined in the RMP. Or, a clear cut MOU between BLM and NDOW should be developed in concert with this plan so as to avoid any hidden surprises regarding the latitude the state can take, especially in emergency wildlife situations. Wildlife water developments are in fact "wildlife water developments". Disallowing future wildlife water developments is disturbing from the standpoint that "naturalized species will benefit". Monitoring data suggests that the diversity of native species using these developments is considerably more than the chukar partridge. To limit the expansion of additional units based on that rationale seems self-limiting	A Statewide MOU between the BLM and NDOW is currently being prepared. The MOU will specify the terms and conditions under which wildlife management activities in the wilderness areas may occur, and will outline the process that will be used to authorize these actions. Construction of new wildlife waters will be allowed when they are the minimum required action necessary for the management of the areas as wilderness.
92	The RMP far oversteps its authority legislated by the amendment in several provisions such as disallowing future water developments for naturalized species. The chukar partridge is the most popular game bird in the state. Our small game guzzlers benefit a myriad of wildlife species whether classified as game or non-game, native or naturalized.	The referenced decision is not included in the Proposed RMP. However, management of lands as wilderness will emphasize native wildlife species.
93	We recommend the existing designated routes, portions of the main Barlett Butte BLM system road (#2052), the Summer Camp route, the Pole Creek West Road, and the route into Wood Canyon be included in the LCT Wilderness Study Area (WSA) and be closed to vehicle traffic. Information has been collected that indicates LCT are negatively affected by road use and maintenance. Furthermore, leaving the roads open will likely result in increased visitation and traffic that will more severely impact LCT habitat. Because this area supports one of only two self-sustaining lacustrine LCT populations, we recommend these routes be closed to vehicle use until monitoring	As stated in Decision LCT Area-3 of the Wilderness Section, restrictions on motorized vehicles will be implemented when monitoring shows negative impacts are occurring to LCT.

Appendix N: Comments and Responses

Wilderness

Section 2: Comment Summaries and Responses

#	Comment	Response
	indicates the habitat has recovered sufficiently to support increased vehicle traffic.	
94	Preserve the Wilderness: The plan should avoid active management of wilderness areas, such as wildlife guzzlers, prescribed burns, or use of herbicides to control weeds.	It is BLM's intent to maintain and enhance the wilderness values of the wilderness areas. Active management of the these areas is allowed for in the Wilderness Act when the action is proven to be the minimum required action necessary for the management of the area as wilderness. Generally active management in wilderness areas will only occur to mitigate a human caused impact such as invasive weeds, or loss of habitat.
95	Several comments indicated that signing of Wilderness boundaries at prescribed intervals was not appropriate. Commentors expressed a preference for improved visitor information and signing where needed to prevent resource damage and impacts to Wilderness.	The language in the proposed plan in decision Wild-3 for wilderness signing has been adjusted to reflect an adaptive management approach. BLM has also prepared maps of individual wilderness areas and has made them available to the public, so that they may more easily locate the boundaries. Additional law enforcement officers have been added to the NCA staff to enforce wilderness regulations.
96	Wilderness designation in the planning area should be removed	Rescinding a congressionally designated wilderness area is outside of the authority of the Bureau of Land Management.
97	·Turn around areas and/ or parking areas need to be established on the cherry stem roads into the Wilderness. This needs to be done for safety reasons and to provide access to the wilderness.	After completion of this RMP a Wilderness Management Plan will be prepared to address site specific management of the Wilderness Areas. As part of that process the need for turn around and trailhead parking areas will be analyzed and if needed, locations will be identified.

Appendix N: Comments and Responses

Special Designations

Section 2: Comment Summaries and Responses

#	Comment	Response
98	A number of comments indicated that Wild and Scenic Rivers should not be designated through the RMP. Comments indicated a lack of support for suitable recommendations for any stream segment in the planning area. Other comments pointed out that adequate protection already existed for the areas and values potentially protected by Wild and Scenic River designation.	<p>BLM planning guidance requires that stream segments in the planning be evaluated for Wild and Scenic eligibility and suitability. To be eligible a stream segment must be free flowing and contain at least one Outstandingly Remarkable Value. A stream segment does not have to have consistent yearlong flow to be eligible. The Outstandingly Remarkable Values for all eligible stream segments can be found in Table 3-6 in Chapter 3 of the Draft Plan.</p> <p>BLM planning guidance mandates that BLM conduct a inventory of stream segments to determine if any of them are eligible and suitable for Wild and Scenic River status. The results of this inventory can be found in Table 3-6 of Chapter 3 of the Draft Plan. The plan does not designate Wild and Scenic Rivers only Congress or the Governor may actually designate a stream.</p>
99	By designating large areas as ACEC, it detracts from the "focus", the intent of the legislation. Keep the ACEC designation to a minimum. Alternative C, as regards ACEC designation in High Rock Canyon, is deemed to best meet the intent of the Act. The same logic applies to the Soldier Meadows ACEC designation. The existing 307-acres designation will have the desired effect of focusing attention. The No Action Alternative as regards ACEC designation in Soldier Meadows is deemed to best meet the intent of the Act. Alternative C, as regards Wild and Scenic Rivers is deemed to best meet the intent of the Act.	<p>The intent of BLM in the Proposed RMP is to focus attention on the sensitivity of resource values within the High Rock Canyon and Soldier Meadows areas. We hope that the ACEC designation will increase the public awareness that they are entering areas where the resource values are unique, important and require changes in public behavior even beyond what is required in the NCA and wilderness areas.</p> <p>The 307 acre existing ACEC at Soldier Meadows was designated prior to acquisition of additional habitat for the rare species. The ACEC included in the proposed RMP would include all the public land habitats of rare species in that area.</p>
100	The difference in stream miles between Alternatives A and B is significant (137.3 miles versus 34.1 miles). Either a stream is or isn't suitable. The lack of uniformity with the choices leads to the conclusion that suitability is a value judgment devoid of fact. Alternative A stream miles are found in and out of wilderness. Designation of W&S within wilderness is a redundancy and should be avoided. The remaining 34.1 miles proposed outside of wilderness are not suitable. We support Alternative C (no designation).	<p>Wild and Scenic River inventories consist of two parts; eligibility and suitability. A stream segment is eligible if it is free flowing and had at least one Outstandingly Remarkable Value. The Outstandingly Remarkable Values for eligible streams in this plan can be found in Table 3-6 in Chapter 3 of the proposed RMP. Suitability determines whether or not a Wild and Scenic river designation would actually provide increased protection of the stream segments. Because the NCA/Wilderness designation already provides some amount of protection for the these streams, the amount of streams proposed as suitable varies among the alternatives.</p>
101	We support the existing, No Action seasonal closure (February 15 through March 31) to visitors and vehicles in High Rock Canyon, without the ACEC designation. We	<p>The seasonal closure from February 15 through March 31 was based upon the potential to disturb nesting raptors during the courtship and egg laying</p>

Appendix N: Comments and Responses

Special Designations

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
	support Alternative C (no designation) with continuation of use restrictions if needed. Rare species management does not require ACEC designation as proposed for Soldier Meadows. We support Alternative C (no designation).	periods when they are most sensitive to human disturbance. Since that time bighorn sheep have been reintroduced into the High Rock Area. Bighorn lambing occurs in April and ewes and their young lambs are particularly sensitive to disturbance during the first month after birth. Wildlife professionals including biologist with NDOW recommended extending the seasonal closure into May in the High Rock area where bighorn and OHV use is concentrated in a small area. ACECs are designated where important resources require special management. For this planning effort, ACECs are considered an appropriate designation when multiple, and potentially conflicting, locally unique resources occur in areas expected to have concentrated human use. The purpose of the ACEC designation then would be to protect those important resources and simultaneously raise the information and education transfer to the users of the importance of the resources.
102	The proposed exclusion of camping in High Rock Canyon when combined with the seasonal road use by off road vehicles seems to be an inherent conflict of preservation and use. I do agree with the seasonal closure High Rock Canyon for wildlife, but take exception to the camping limitation in the canyon while leaving the route open to vehicular traffic. Backpacker's have a minimal impact from continued camping and the Corridor Trail concept has a minimal to nonexistent impact.	The seasonal closure from February 15 through March 31 was based upon the potential to disturb nesting raptors during the courtship and egg laying periods when they are most sensitive to human disturbance. Since that time bighorn sheep have been reintroduced into the High Rock Area. Bighorn lambing occurs in April and ewes and their young lambs are particularly sensitive to disturbance during the first month after birth. Wildlife professionals, including biologists, with NDOW recommended extending the seasonal closure into May in the High Rock area where bighorn and OHV use is concentrated in a small area. ACECs are designated where important resources require special management. For this planning effort, ACECs are considered an appropriate designation when multiple, and potentially conflicting, locally unique resources occur in areas expected to have concentrated human use. The purpose of the ACEC designation then would be to protect those important resources and simultaneously raise the information and education transfer to the users of the importance of the resources.
103	What is not clear is the extent of fencing that would be allowed in the Soldier Meadows ACEC. Fencing and grazing should be kept at its present level and not extended. Excessive fencing will detract from the primitive character of what emigrants knew as Mud Meadows.	Decisions to fence portions of the Soldier Meadows area that contains habitats for Desert dace, springsnails, and Basalt cinquefoil are not included in the Proposed RMP. The fencing for those habitats will be completed prior to the adoption of the plan as one of the elements of a Biological Opinion issued to BLM by the FWS. The Proposed RMP does include language on

Appendix N: Comments and Responses

Special Designations

Section 2: Comment Summaries and Responses

#	Comment	Response
104	I recommend that the following points be included in the final plan. These points are not discussed in the draft. More protection should be explicitly provided for the hot springs habitats at Soldier Meadow and Black Rock Springs. I've seen severe tire track damage to hot springs habitat at Soldier Meadow.	how the fenced are would be used to manage livestock and wild horses. The Proposed RMP provides for closure or relocation of roads at Soldier Meadows that allows vehicles to access the primary hot springs areas. Additionally, camping next to hot pools would be eliminated and all camping would occur in designated camping areas within walking distance of hot springs. Camping at Black Rock Spring would also be allowed in designated camping locations more than 300 yards from the spring.
106	Wild and Scenic Rivers. Appendix J states three questions that "guided the suitability recommendations". There are almost no details of how the questions were answered and how suitability was assessed for each stream. There is no justification of the Alternative C assertion, page J-6, that existing designations provide sufficient protection. Asserting that these designations offer sufficient protection under Alternative C, but not under Alternative B and Alternative A, certainly appears illogical.	Although specific findings were not included in the Draft Plan, all three questions in appendix J were used to evaluate the suitability of each stream segment. BLM must capture the full range of reasonable alternatives when preparing an RMP. To accomplish this BLM varied the number of suitable streams among the alternatives. This does not imply that suitability is an arbitrary decision but that it is a professional judgment made by the agency based on balancing often conflicting resource values and whether or not WSR designation would actually increase the protection of the stream outstandingly remarkable values. No Wild and Scenic Rivers designations are recommended for in the Proposed Plan because BLM believes that sufficient protective designations and management currently exists on the streams. 11 of the 16 eligible streams are located with designated wilderness. Wilderness designation is the highest level of protection for BLM lands. Designating these streams as WSR would not add any additional protective management to these streams. 3 of the streams are located within a WSA and a Natural Area that was specifically designated for the protection of the fisheries values associated with those streams. The remaining 2 streams are located within the NCA and two separate ACECS which would not allow for the degrading of the streams values.
108	Grazing language for ACECs and the LCT Area in Alternative A and B is unacceptable and contrary to the intent and language of the Act.	The act provided that grazing would continue where permitted at the time of designation subject to applicable laws, regulations and executive orders. Restrictions on grazing within the High Rock Canyon ACEC were developed in 1981 in compliance with the Federal Land Management and Policy Act and are retained in the Proposed RMP as provided in the Act. Grazing within the Soldier Meadows Area is being limited due to the requirement to comply with the Endangered Species Act. Grazing in the LCT Area is not constrained by the NCA legislation as this area is outside the NCA and the Act specifically limits the Act to areas within the NCA and wilderness areas.

Appendix N: Comments and Responses

Special Designations

Section 2: Comment Summaries and Responses

#	Comment	Response
109	No justification is offered for restricting the access of wild horses and humans to the Soldier Meadows ACEC, while allowing limited private livestock grazing. It seems as though wild horses would have priority access to the limited resources of this area, while livestock grazing can easily be moved offsite.	Limitations on grazing in this area are carried forward in order to comply with the Endangered Species Act. Wild horse use of the Soldier Meadows area occurs outside their designated Herd Management Area (Map 3-6) and there is no evidence of a need to change the boundary. Therefore horses do not have a priority for use in the area and are considered a potential threat to the balance of other uses. The proposed RMP includes a provision that grazing could be allowed under a prescriptive grazing program if consistent with the recovery of the rare species within the ACEC. Grazing use under this requirement would occur infrequently and for very short duration only when determined beneficial to the rare species.
110	Several comments received voiced concerns over the size of the Soldier Meadows and High Rock Canyon ACECs. Some commentors supported reductions in size or elimination of both ACECs. Others preferred maintaining the size of the existing ACECs or enlarging them. All ACEC comments expressed that the protection of important values within the ACEC would be improved through a change in ACEC size.	ACECs are designated where important resources require special management. For this planning effort, ACECs are considered an appropriate designation when multiple, and potentially conflicting, locally unique resources occur in areas expected to have concentrated human use. The purpose of the ACEC designation then would be to protect those important resources and simultaneously raise the information and education transfer to the users of the importance of the resources. Additionally, ACEC designation in itself does not add additional layer of rules and regulations. Each ACEC is designated to provide special management actions required by important resources values. It is those management actions that changes uses within an ACEC not the designation itself.

Appendix N: Comments and Responses

Vegetation

Section 2: Comment Summaries and Responses

#	Comment	Response
111	BLM must also address measures to restore lands where weeds have been treated. Before BLM undertakes burns or any vegetation manipulation, it must first heal livestock/road/mining/mineral exploration damaged lands. BLM needs sharply reduce sources of disturbance/causal factors of weed invasion and restore health of understories, microbiotic crusts and native vegetation communities.	Vegetation treatments in support of restoration of lands is provided for in the proposed RMP. Prior to initiation of any project, a site-specific evaluation including appropriate NEPA compliance as well as any required cultural or Endangered Species Act consultation would be conducted to determine the best treatment practices and post-treatment management to ensure the project is a success.
112	While the draft discusses life history and habitat requirements of fish and special status species such as Sage Grouse and sensitive plants, the document does not contain information on other mammals, migratory birds, amphibians and invertebrates, especially of sagebrush-obligate species. In addition, habitat for Lahontan cutthroat trout continues to be degraded in the NCA area. The NCA plan alternatives are substantively deficient in protecting, conserving, and enhancing the area's fish and wildlife resources and their habitats.	The RMP provides broad guidance for all programs and uses. Limited specific guidance is provided because it would be impossible to cover the entire range of species and wildlife habitats in adequate detail. The RMP depends upon the implementation of activity plans that would deal with priority species and geographic areas. In addition there are other guidelines that exist to aid in the management of sensitive species. The requirement that Land Health Standards apply to all uses and programs provides one of the primary mechanisms to incorporate the most current management practices for wildlife species management, including the two references in the comment. Additionally, requirements for consideration of migratory bird species in project planning and implementation has been included in the proposed RMP.
113	Noxious weeds need to be controlled, but control methods with the least impacts to other uses, natural processes, and native vegetation should be used. Herbicides should be avoided.	The NCA and Wilderness remain areas where native vegetation in good condition remains more common than invasive species. Noxious weeds are invasive, non-native species that can replace native vegetation over wide areas. The Proposed RMP provides for active inventory followed by aggressive response to weed populations before they become large. Control of noxious weeds would be conducted using the best combination of treatment practices developed specifically for the target species and infested site, consistent with Nevada Revised Statute 555.010 (DEIS, 2-9).
114	We are very concerned about the ensuing off-road impacts of any BLM fire and vegetation treatments causing increased soil disturbance, "brush clearing, cross country travel in the course of conducting projects (prescribed fire, mechanical thinning of woody, vegetation, mowing, brush-beating, etc"), all of which are likely to lead to easier and increased OHV travel and new roading. BLM must consider this very negative impact of vegetation removal, landscape scars and areas cleared by "treatments" entice motorized users, and take a very long time to heal In big sagebrush habitats"	The barren playa of the Black Rock Desert is the area open to off road OHV use. All other areas are either closed to OHV use or limited to designated routes. These requirements apply to BLM as well as the public. If off-road vehicle access is required for fire suppression or other purposes, it would be restored at the completion of the project to prevent formation of new routes.

Appendix N: Comments and Responses

Vegetation

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
115	We request additional information be provided regarding the implementation of green stripping and its benefits, costs, and expected maintenance of these areas.	Green stripping was included in the plan as one of several potential tools that could be used to reduce wildfire size in areas dominated by invasive, flammable species. There are no current proposals to use green stripping within the Planning Area so no specific additional information can be provided on implementation including costs and maintenance. If green stripping was chosen as appropriate technique for a given site, site specific analysis would be completed prior to implementation.
116	Page 3-23 3.8.4 Noxious Weeds, roads and road maintenance are not mentioned as vectors for the increasingly visible noxious weed problem within the NCA boundaries. This oversight should be corrected and provisions for mitigation provided.	Section 3.8.4 has been modified to include this potential invasion vector. This impact has also been added to Chapter 4.
118	1) In common to all , obj. 8 = add words "or non-functioning status 2) Alt. B needs to include the possibility of prescribed fire as a tool for restoring areas that are currently monoculture stands of grass . 3) Not listed in the impacts : Up-grading roads = increased # of vehicles = increased WEEDS .	1) Objective 8 in Section 2.4.8.1 has been modified to apply to all riparian areas. 2) This possibility is provided in Decision VEG-10. 3) The Vegetation impacts in Chapter 4 have been modified to include this impact.
119	·Any minimum tool requirement in the Wilderness areas must address the reality of noxious weeds. Large infestations, if they occur, will require the use of mechanized equipment, airborne or ground-based, to control/ eradicate the populations. These approaches should not be excluded. ·An active weed inventory program that must be repeated frequently. Infestations are treated easiest when they are small and small populations can explode quickly when the right growing conditions occur. Because of access restrictions the Wilderness Areas should be inventoried frequently, five years or less. ·BLM should immediately adopt a weed-free forage program for all of the NCA and Wilderness Areas. This is one of the best approaches to keeping noxious weeds out of remote areas	Methods for controlling weeds in Wilderness Areas would be made through the minimum tool process. The proposed RMP does not exclude any potential treatment methods, but leaves the decision of what is the appropriate treatment in any situation to the site-specific analysis. Active weed inventory is ongoing and expected to continue. The requirement to use weed free hay on public lands is a BLM policy, but that language has been added to the proposed RMP.

Appendix N: Comments and Responses

Livestock Grazing

Section 2: Comment Summaries and Responses

#	Comment	Response
120	The Executive Summary sections ES.5.2, ES.5.3 and ES.5.4 state: " Areas grazed at the time of enactment would be maintained." This statement should conform to the language in the NCA Act in Sections 5(f) and 8(d).	The language in the Executive Summary has been changed to reflect the wording in the NCA Act.
121	Areas in the planning area proposed for prescription grazing including the High Rock Canyon, Little High Rock Canyon, Soldier Meadows Hot Springs, Stanley Camp Riparian Pasture, and Massacre Ranch areas should not be grazed, even on a limited basis.	Restricted grazing through a site-specific grazing prescription is retained in Decisions ACEC-4, GRAZ-3, GRAZ-5, GRAZ-10, and GRAZ-11 in the proposed RMP. Future opportunities for prescribed grazing in these areas maintains the use of livestock grazing as one of a number of techniques to change vegetation composition, structure or standing crop. It is expected that use of prescribed grazing would occur in any of these areas infrequently and only after a site-specific NEPA analysis and appropriate coordination and consultation with affected agencies and other stakeholders.
122	The proposed RMP decision in Section 2.7.9 that changes the boundaries of the Buffalo Hills, Paiute Meadows and Jackson Mountains allotments is unclear. The map does not specifically show the changes in the allotments. Would the decision open additional areas to livestock grazing to increase permitted grazing? This proposal should not be included in the RMP, but should be considered in the allotment evaluation and Multiple Use Decision process for each allotment.	Map 8-7 provides a comparison of the existing and proposed change in allotment boundaries. Decision GRAZ-12 in the proposed RMP would change the allotment boundaries to conform to historic livestock grazing areas. No currently ungrazed areas would be grazed as a result of the decision. No change in permitted livestock use levels would occur. The decision is appropriate for the RMP because the designation of areas for livestock grazing must occur in an RMP.
123	The High Rock Canyon, Little High Rock Canyon, Soldier Meadows Hot Springs, Stanley Camp Riparian Pasture, and Mahogany Creek Exclosure areas should be available for regularly scheduled grazing because there is little evidence that the areas should not be grazed and restricting grazing is contrary to the NCA Act.	Grazing would be restricted or not permitted in the Soldier Meadows Hot Springs, Stanley Camp Riparian Pasture, and Mahogany Creek Exclosure areas to aid in the recovery of species listed as threatened under the Endangered Species Act. The recovery plans and recent Biological Opinions prepared by the FWS for listed species within these areas included the best available information and support the limitations on livestock use. Grazing would be restricted in the High Rock Canyon and Little High Rock Canyon areas to allow for the continuing recovery of riparian vegetation in the narrow canyons where livestock previously concentrated. These areas also provide visitors vegetation conditions similar to those experienced by the emigrants. In all these areas, the benefits to resources and uses other than livestock grazing are considered to be greater than the small losses of forage for livestock. The NCA Act provides that livestock grazing should continue where it was permitted at the time of designation, subject to applicable laws, regulations, and Executive Orders. The Stanley Camp Riparian Pasture, and Mahogany Creek Exclosure areas are outside the NCA and Wilderness Areas and

Appendix N: Comments and Responses

Livestock Grazing

Section 2: Comment Summaries and Responses

#	Comment	Response
		therefore not subject to provisions of the NCA Act. All the restricted grazing areas would continue past practices developed as a result of compliance with regulations implementing the Endangered Species Act, the Federal Land Management and Policy Act, the Clean Water Act and other applicable laws.
124	Any grazing language included in the Plan for areas outside of the NCA to be managed as a part of the plan should adhere to the intent of the Act and specific grazing changes should only be addressed in specific AMPs or LUPs and not in the NCA resource plan.	Areas outside of the NCA or wilderness areas but within the planning area are not subject to the Act, as they are not part of the NCA. Specific grazing changes will indeed be addressed in specific AMPs and LUPs. Changes proposed in the proposed RMP provide the broad direction for those more specific changes.
125	As opportunities present themselves, grazing leases should be bought up from willing sellers.	There are no provisions in the law or regulations for purchase of grazing permits by BLM.
126	The RMP should allow grazing in areas currently ungrazed and not part of any grazing allotment. Specifically portions of the Black Rock Desert Wilderness Area with unused forage should be considered for livestock grazing.	The areas of the Black Rock Desert Wilderness Area that are not part of a livestock grazing allotment were not permitted for grazing at the time of the passage of the NCA Act. Therefore the areas cannot be permitted for livestock use in the future.
127	Small birds sometimes drown in stock tanks and troughs. Provide escape ramps or floats to prevent drowning (Candelaria and Wood 1981).	Decision GRAZ-7 in the proposed RMP supports modifications to existing water developments consistent with the comment.
128	The RMP does not contain specific guidelines or limitations on livestock grazing that would prevent damage or slow restoration of soils, wildlife habitats and populations, vegetation communities or wetland/riparian areas.	The RMP provides broad guidance and decisions to manage the area in a manner consistent with the intent of the NCA Act, all laws and regulations, and in accordance with the Land Health Standards described Appendix C. Specific grazing management practices include intensity, frequency, timing, duration, and location of grazing. Practices that are consistent with the guidance described above are developed through allotment evaluations on a site-specific basis. Selection of the mix of livestock grazing practices that best meet the resource objectives of each area grazed and the implementation strategy for those practices would follow appropriate NEPA analysis including public involvement.
129	Any remaining livestock grazing within the NCA should be permanently retired no later than when the current permits expire. Livestock grazing is known to degrade desert ecosystems, and is not compatible with conservation management. Leave our public lands in good condition for future generations.	The enabling legislation provides that livestock grazing will continue where it was permitted at the time of designation, subject to existing laws and regulations. Retiring of livestock permits at some future date is not consistent with the NCA Act.

Appendix N: Comments and Responses

Livestock Grazing

Section 2: Comment Summaries and Responses

#	Comment	Response
130	We ask that you clarify and inform the Reno Fish and Wildlife Office of the process for incorporating the terms of Multiple Use Decisions (MUDs) for livestock grazing into management of the planning area. For instance, grazing management on the Hot Springs Pasture of the Soldier Meadow Allotment may conflict with recreation management within the NCA. Additionally, management of federally listed and candidate species may also result in conflicting objectives. How will potential allotment boundary adjustments and operator flexibility affect MUDs? How is operator flexibility defined? What are the implications with respect to sensitive resources, riparian areas, and streams and springs?	The relationship between the Multiple Use Decision (MUD) process for grazing and wild horses and other uses of the public land is complex. During the allotment evaluation process, the impacts of livestock grazing practices and wild horse and burro management on all the applicable resources in the allotment are evaluated. If conflicts are identified the MUD can be modified to meet the multiple uses within the allotment. The MUD must correspond to a specific area authorized for grazing. If allotment boundaries are adjusted for any reason, the MUD for that allotment would apply to the area within the altered allotment area. Operator flexibility is the range of potential actions, including timing, duration, frequency, intensity, and area of livestock use, a livestock grazing permittee may take without BLM being required to further analyze the potential actions. The MUD will include ranges or threshold for grazing practices that define the limits to operator flexibility. When federally listed or candidate species occur within a grazing allotment, BLM is required to consult with the FWS prior to issuance of the MUD. Also the allotment evaluation process leading to the MUD requires that consideration of all the resources, including riparian areas, springs and streams be included to meet RMP objectives and Land Health Standards.
131	Operator flexibility serves the overall objectives, so if livestock is a given, the flexibility to manage it to promote range health within an allotment should be an option.	Appropriate levels of operator flexibility is provided livestock graziers and rangeland managers as part of the allotment evaluation and decision processes. The RMP provides broad guidance and direction but not specific practices for livestock grazing.

Appendix N: Comments and Responses

Wild Horses and Burros

Section 2: Comment Summaries and Responses

#	Comment	Response
132	As stated previously, we support gathering excess wild horses and burros and maintaining or decreasing AMLs to reduce habitat degradation. We prefer that AMLs be decreased as prescribed in the Rangeland Health Standards.	The designated AMLs are considered appropriate to ensure a thriving ecological balance among wild horse and burro populations, wildlife, livestock, vegetation resources, and other resource values. AMLs are changed either up or down following a site-specific analysis of monitoring data. RMPs were the vehicle to set AMLs until court decisions required the site-specific analysis. Now AMLs can be adjusted when data exists that indicates that an adjustment is required to meet Land Health Standards or other resource objectives. It is BLM policy to gather horses and burros to achieve the AML. Land Health Standards provide a desired baseline for all rangelands within the planning area. BLM works to develop strategies for managing all uses within the planning area to achieve those standards.
133	In Chapter 2, page 11, third paragraph 4 in the left hand column, the text states that "Aircraft would continue to be used for the management and, when necessary, removal of wild horses and burros". It might be helpful to point out that removed horses and burros are offered up by adoption by the BLM. The planning document never makes it clear what happens to Horse and Burros that are removed to achieve AMLs.	Information related to the gathering and adoption of wild horses and burros has been added to Section 3.10.
134	Wild Horses and Burros, Threatened and Endangered Species and the Wilderness Act of 1964 all share language that require health rangeland and habitats. The Bureau of Land Management's Wild Horse Strategical Plan required that each herd have an appropriate management level and be managed at that level at the time of this document. It has been our observation that none of 14 wild horse herds have appropriate management levels that were determined under the same criteria nor was the available forage allocated the same for each herd. The Draft Resource Management Plan portrays the appropriate management levels and suggests that adjustments in stocking levels may achieve a thriving natural ecological balance as required by the Wild Horse and Burro Act. Since the Resource Management Plan is to set guidance to new activity planning in the future, the document should recognize the need for new AML's and provide a consistent reasonable set of standard operating procedures to determine these AML's.	When monitoring data indicates that impacts on resources are occurring as a result of livestock or wild horses or burros, appropriate adjustments will be made to the specific class of use (Decision WHB-7). Each Herd Management Area is different, and the type of available monitoring information, the resource values and uses and the seasonal use patterns of wild horses are also different. Therefore it is not surprising that the approach used in setting AMLs on adjacent HMA varies. BLM has gathered all the HMAs within the past several years, removing over 3000 head of horses from the NCA and wilderness areas. This effort has resulted in most areas being close to the identified AML. BLM will continue to gather to balance horse numbers with the other resources and uses.
135	Attain and maintain appropriate wild horse numbers within the area occupied at the date of passage of the "Wild Horse and Burro Act " .	The law requires that wild horses and burros be managed on public lands in a manner that maintains as thriving ecological balance between horses and other natural resources. The NCA Act identified wild horses and burros as one of the values within the NCA. Over the past several years over 3,000 animals have been removed from the NCA in order to maintain this balance. BLM will continue to manage horse and burro numbers to meet

Appendix N: Comments and Responses

Wild Horses and Burros

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
		the population management goals to the best of our ability.

Appendix N: Comments and Responses

Wildland Fire

Section 2: Comment Summaries and Responses

#	Comment	Response
136	Prescribed fire is acceptable in some areas where effects are well understood and negative impacts are minimal. Using fire to promote vegetation diversity and Great Basin Wildrye in the (now) xeric meadows for example may be acceptable. Fires in some of the upland shrub sites may not be desirable. All aspen stands still surviving in the area need to be actively protected and restored. All prescribed fire effects need to be disclosed and subjected to ecological modeling such as VDDT or SIMPPLE or similar state-and-transition models.	Prescribed burning would be used only where a site-specific analysis indicates that use of fire would likely achieve the objectives without undue risk. This analysis would include opportunities for public involvement.
137	I am not sure what the fire language for Alternative B means, but it seems to indicate that fire suppression techniques might be used even in Category B areas (page 2-34). All current research shows that the reestablishment of natural fire regimes is of paramount importance. The ultimate result of the reestablishment of a natural fire regime is that all fires outside the urban/wildland interface will someday be wildfires. Wildland fires, when they occur in acceptable seasonal conditions are a vital component in the process to return to natural fire regimes.	Active suppression would be the most likely scenario in both Category A and B areas. Because of the risks of conversion to cheatgrass in lower elevation salt desert shrub and sagebrush communities and concerns about the loss of sagebrush regionally it is not desirable at this time to attempt to reestablish natural fire regimes.
138	We do not see clear evidence supporting the conclusion that eliminating grazing from the Mahogany Creek enclosure and Stanley Camp Pasture would maintain increased fuel loads and could indirectly increase the size of potential fires and fire suppression costs. In fact, trespass cattle grazing within the enclosure has been an issue for this area for the past 10 years, and yet the human-induced fire in 2000 burned intensely through the woody vegetation in this area.	Grazing removes fine fuels at a rate of about 1000 pounds per AUM. Depending upon the levels of grazing, this reduction in fuels may be sufficient to alter fire behavior in such a manner that fires spread more slowly. This could lead to reduced fire size and lower suppression costs.
139	We favor fire suppression Category B for trail corridors with the proviso that a plan be instituted to prevent damage to the trail and its corridor by heavy equipment used in fire suppression. Within the NCA, wildfires will not damage a trail but heavy equipment, like bulldozers, used to fight a fire can irreparably damage an historic trail.	Section 8.2.11.2, Decision FIRE-8 of the proposed RMP has been modified to include specific reference to use of heavy equipment on the emigrant trail. Additionally all wild fires in the NCA and wilderness would include the use of wilderness specialists and archaeologists as resource advisors to ensure that fire suppression activities cause minimal impacts on important resources values.
140	Any and all means of fire suppression should be allowed. Every time a fire occurs cheat grass takes over and makes more of a fire hazard than before. We need to use every means available to fight fires in the Black Rock NCA/Wilderness including mechanized as well as aerial. It will also stifle or reduce the effectiveness or rehabilitation and restoration projects in burn areas.	Although Category B lands may be subject to fire through modified suppression techniques or prescribed burning, the expected response in almost all cases of wildfire is likely to be full, aggressive suppression. The risk of conversion of cheatgrass in the lower elevations and the regional loss of sagebrush requires a very cautious approach to fire within the NCA and wilderness area.
141	We recommend reevaluating the proposal to designate the Soldier Meadow area for	The Category A polygon at Soldier Meadows is centered around the private

Appendix N: Comments and Responses

Wildland Fire

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
	full fire suppression. Prescribed fire may be appropriate in some cases, for instance, to remove excess dead vegetation in ungrazed spring enclosures for the benefit of basalt cinquefoil, desert dace, or spring snails. Rehabilitation of and monitoring for non-native species in burned areas is also recommended.	lands associated with the ranch, not habitat associated with the rare species. Those areas are designated as Category B, where fires could be used to meet the resources objectives.

Appendix N: Comments and Responses

Fish and Wildlife

Section 2: Comment Summaries and Responses

#	Comment	Response
142	<p>In the Nevada Bird Conservation Plan (1999), Nevada Partners in Flight identified over 50 bird species of conservation concern in our state, over half of which occur in these sagebrush steppe habitats. Rather than taking a species-level approach to conservation, this document associates suites of species of concern with their habitats, thus taking a more holistic approach with an emphasis on habitat quality and quantity. In the Bird Conservation Plan Nevada Partners In Flight made many management recommendations for reducing declines in the populations and habitats of these species. We are requesting that this document be incorporated into this NCA planning process. Also, there are additional management strategies in Birds in a Sagebrush Sea: Managing Sagebrush Habitats for Bird Communities (2000) written by Sharon A, Ritter and Christine Paige and published by the Idaho Partners in Flight. Please incorporate additional direction from these two publications for Nevada birds , and habitat in the final RMP/EIS for the NCA.</p>	<p>A new decision related to consideration of migratory birds has been added to the Proposed RMP that would include the use of appropriate practices from the two cited publications during site-specific actions and project implementation. See decision FW-4.</p>
143	<p>There is a concern that the specifics of wildlife management relative to the jurisdiction and responsibilities of Nevada Division of Wildlife (NDOW) within the designated Wilderness and NCA could be compromised by the adoption of this RMP as written. The Commission would like to strongly emphasize Sec. 4 (d) (8) of the Wilderness Act of 1964, which states; "Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish...".</p>	<p>Actions related to wildlife management in wilderness areas have been revised in the Proposed RMP to better conform to NDOW's identified actions as expressed during comment period. Also the Proposed RMP attempts to conform to the MOU between NDOW and federal land management agencies related to wildlife management in wilderness areas.</p>
144	<p>The RMP does not contain specific guidelines for improvement of wildlife habitats and populations for game and non-game species.</p>	<p>The RMP provides broad direction and decisions to manage the planning area in a manner consistent with the requirements of the NCA Act and other laws, regulations, Executive Orders, and Land Health Standards. Specific management practices would be developed and implemented throughout the life of the RMP as part of efforts to evaluate and adjust activity plans, develop projects and other actions. Selection of the mix of practices that best meet the resource objectives for specific geographic areas or wildlife habitats would occur following appropriate NEPA analysis. Information on this process is contained in Chapter 9.</p>
145	<p>All wildlife water developments in wilderness areas should be constructed and maintained in support of all wildlife. Their purported adverse effect on wilderness and naturalness relates more to individual values than actual effect. They provide a positive effect for resources in the landscape. They help maintain populations of both game and non-game species that attract both hunters and non-hunters to the area, which provides economic benefit to local communities.</p>	<p>The existing constructed wildlife water sources will be maintained as stated in decision FW-10 of the wildlife section in the proposed plan. Construction of new wildlife projects will be authorized in wilderness if they meet the criteria of being the minimum required action necessary for management of the areas as wilderness, as mandated by the Wilderness Act of 1964.(Standard Wilderness Water Development Response) Emphasis in wilderness areas will be put on native wildlife and natural population</p>

Appendix N: Comments and Responses

Fish and Wildlife

Section 2: Comment Summaries and Responses

#	Comment	Response
		dynamics.
146	The RMP includes commitments to systematically inventory the numerous species in the NCA (including mammals, birds, amphibians, and invertebrates) and study their habitat requirements, including healthy spring systems and riparian areas. We do not find many specific measures in the alternatives, which would accomplish the wildlife objectives, including an inventory of species and data on habitat requirements and Wilderness areas, and other sensitive areas. Clarify what specific measures BLM intends to take as a commitment to inventory the numerous species in the NCA.	The RMP is generally intended to provide broad guidance not specific actions. During the implementation of the RMP site-specific actions and projects would be undertaken to meet the needs of wildlife including inventory of populations and habitats. The Proposed RMP Implementation section includes general information on monitoring and inventory. Specific measures are not included because they cannot accurately predicted at this time. The species, habitat and geographic area to be inventoried and monitored in the future depend upon funding and the priorities associated with habitat/species issues or geographic areas.
147	Section 3.12.3.6.1 This section mentions "valley quail (Lophorlyx californicus)." There is no such species of bird identified by this common or scientific name-the reference should probably be to California Quail (Callipepla californica).	Section 3.12.3.6.1 has be modified to include this correction.
148	The final plan should clearly identify that the population management direction and priority within the planning area will remain the jurisdiction of the State. Specific population management actions such as, but not limited to, the continued management of naturalized species, water developments, trapping and transplant of native and naturalized species are critical to wildlife management. Additionally, authorization and/or implementation of animal damage control and emergency wildlife management actions as may be determined necessary by the NDOW should continue to be implemented on an as needed basis.	The Proposed RMP includes the language from the legislation which identifies the role of NDOW in managing wildlife populations. The Proposed RMP includes provisions for animal damage control and emergency wildlife management actions in wilderness areas consistent with management of these areas to retain wilderness values.
149	Fish and wildlife management 2.4.12.2.2 "Naturalized game birds would continue to be priority species for hunters in the Wilderness Areas, but no additional wildlife water developments or other habitat manipulations would be undertaken to manage naturalized game bird populations in Wilderness." Consensus by the NCA/RAC was contradictory to this language. Proposed wildlife population management activities including species selection and program priority are the jurisdiction and responsibility of the state. Therefore we strongly recommend the deletion of the above language from the plan.	The referenced decision is not included in the Proposed RMP. However, management of lands as wilderness will emphasize native wildlife consistent with BLM wilderness regulations.
150	The Commission, in their negotiations with the Nevada Legislative delegation, was assured that specific wildlife management programs and activities would be identified and included in this planning effort. The deferral of these decisions to additional activity plans to be developed in the future is not acceptable. The lack of wildlife management	We have attempted to add specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. We are committed to working closely with NDOW in the future in order to

Appendix N: Comments and Responses

Fish and Wildlife

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
	decisions in this plan and the uncertainty of timely completion of the activity level plans leave us unable to plan and implement effectively within these areas.	effectively manage wildlife populations and habitats and are confident that any future required site-specific analysis can be completed in a timely manner.
151	Language listed under Preferred Alternative 2.7.12.1 " Animal damage control in Wilderness would be allowed only to protect threatened and endangered species, and to prevent the transmission of disease to other wildlife and humans, and to prevent serious loss to livestock" is not the jurisdiction of the BLM. For example, wildlife control activities to protect newly introduced species have been shown to be an effective tool in population establishment. These decisions are the exclusive jurisdiction of the state management authority and as such should not be considered in this RMP.	The proposed RMP does not address the animal damage control activities outside designated Wilderness conducted by NDOW. The language in the proposed RMP is consistent with BLM's policy on Animal Damage Control in wilderness areas.
152	Page 3-31 and 32. 3.12.2: It appears the information on LCT is not up to date. Our understanding is that LCT does not currently occur in the North Fork of Jackson Creek, and both the North Fork of Battle Creek and Colman Creek have been identified as occupied habitat, not potential habitat. Additionally, the 1996 Nevada Division of Wildlife reference should be included in the literature citation.	The section has been updated and the NDOW reference added to citations.
153	Hunting and fishing are also allowed in the NCA. There is little about it in the Draft EIS.	Hunting is a recreation related activity were discussed in the recreation and socio-economic sections of Chapter 3. Hunting and fishing are administered by the State of Nevada and nothing in the proposed RMP would change that administration (Section 8.2.12). The first objective in Section 8.2.12.1.1 includes providing quality hunting and fishing opportunities.
154	Section 3.12. Mine shafts and adits are recognized for their potential to provide habitat for numerous bat species. We are also finding they are used as winter roosts for Black Rosy Finches, a NV PIF Species of Concern. The fact that these sites are increasingly being evaluated as bat roosts and hibernacula prior to closure is good, but their value as for the Black Rosy Finches should also be assessed. The list of bird species at playas is probably not intended to be exhaustive. However, Snowy Plover (<i>Charadrius alexandrinus</i>) is one of the more critical species for which the playas provide breeding habitat and they should be included in this list.	Section 3.12 has been modified to include this information.
155	Page 3-30.3.12.1: Please clarify the language in this paragraph to reflect the consultation process. The Service provides species lists to the action agency that identifies federally listed, proposed, candidate species as well as species of concern that may occur in the project area. A biological opinion is provided for those listed	Section 3.12.1 has been updated to better reflect the consultation process.

Appendix N: Comments and Responses

Fish and Wildlife

Section 2: Comment Summaries and Responses

#	Comment	Response
	species within the action area that may be adversely affected by the actions proposed by the agency.	
156	Table 3-15 For Sage Grouse the table indicates the "Primary risk is a loss of sagebrush cover." This statement should be modified to include the loss of grasses, forbs. and associated insects this species requires.	Table 3-15 has been modified to reflect this information.
157	1) F & W Management - animal damage control in Wilderness. It's my understanding that science has shown control to be only temporary in effectiveness as coyotes will increase their populations accordingly. Also, if coyote populations are down, it could result in over-population of rodents / small mammals. This in turn could increase depredation on sage grouse nests. These impacts have not been addressed. 2) The need for more systematic studies of numerous species, spring systems, and riparian areas is not addressed. 3) The fact (p. 3-32) that 54% of aquatic ecosystems within the NCA are FAR (functioning at risk) or NF (non-functioning) has a huge impact on many species. This should be noted in the impacts either here or in the grazing section.	1. Impacts associated with animal damage control are included in Chapter 4 in the Impacts on Fish and Wildlife from Fish and Wildlife Management. 2. There is a continuing need for additional studies in support of implementation of the proposed RMP. This is discussed in chapter 9 of the proposed RMP. 3. The relationship between riparian condition and wildlife habitat value has been added to section 3.12.3.3.
158	The draft document states that the Black Rock playa is barren. Barren of vegetation perhaps, but not barren of life. There is no discussion of the playa's invertebrate life forms and possible impacts to invertebrate life, although you do concede that information about invertebrate life is unavailable.	Section 3.12.3.6.8 has been modified to include information about potential invertebrate populations on the playa. However, because no specific information current exists for the occurrence of specific invertebrate species, no changes were made to Chapter 4. Invertebrates will continue to be considered during site-specific evaluation of activities that occur on the playa.
159	2.4.12 This section misses any mention of antelope or big horn sheep. Antelope and big horn sheep are part of the system in the area. They provide a large game viewing and hunting opportunities. Please provide an objective for big game as well as for small wildlife and reptiles. We need to be as inclusive as possible.	While the objectives for wildlife in section 2.4.12 do not specifically mention antelope, Objectives 1,3 and 4 in section 2.4.12.1.1 includes the needs of antelope. California bighorn sheep are considered a special status species in Nevada. Objective 1 in section 2.4.13.1 includes the needs of bighorn.
160	Elk is a native species that has occurred and will continue to immigrate into the entire area. I would hope this species is recognized as a native species and managed by NDOW in concert with the development of an Elk Management Plans for Humboldt and Washoe Counties.	While future elk populations in the Planning Area are not specifically mentioned in the plan, they are considered a native species. The wildlife objectives in section 2.4.12 would support future elk management in the Planning Area.
161	Section 3.12.3.7.1 Evidence is emerging that indicates that high quality sage grouse habitat does not equate to high quality habitat for all sagebrush obligates.	Section 3.12.3.7.1 has been modified to reflect that sage-grouse are not the only species of concern in sagebrush habitats.

Appendix N: Comments and Responses

Fish and Wildlife

Section 2: Comment Summaries and Responses

#	Comment	Response
	Using Sage Grouse as an umbrella species is probably not a safe assumption upon which to predicate the analysis for the EIS.	
162	We recommend the BLM reassess the potential for use of wetlands or riparian habitats by wading or migratory birds within the NCA boundaries. It is likely that a variety of bird species will utilize even very small wetlands or riparian zones relative to the landscape as resting or foraging grounds.	Sections 3.12.3.6.6 and 3.12.3.6.7 have been modified to include this information.
163	My recommendation is that that the RMP either be specific in addressing NDOW authority and allowed activities, or that all wildlife management references be omitted in lieu of a joint memorandum of understanding between BLM and NDOW detailing these issues. The MOU should be completed in 2003 to minimize interruptions in management activities.	The Proposed RMP includes the language from the NCA Act related to State jurisdiction in management of wildlife in Section 8.2.12.2. This section also identifies that a statewide MOU is being prepared in conjunction with NDOW that will specify the terms and conditions under which wildlife management activities in the wilderness areas may occur, and will outline the process that will be used to authorize these actions.
164	Section 3.12.3.4 Although mentioned elsewhere, it should be explicitly stated in this section that Ferruginous Hawks rely heavily (though not exclusively) on junipers for nesting	Section 3.12.3.4 has been modified to include this information.
165	There is a concern that the specifics of wildlife management relative to our agency's jurisdiction and responsibilities within the designated Wilderness and NCA could be compromised by the adoption of this RMP as written. The deferral of wildlife management decisions to activity plans to be developed sometime in the future would severely limit the states ability to plan and implement wildlife management activities in this area. For example, the specifics of all trap and transplant and survey inventory work with division aircraft is deferred to the minimum tool analysis found within the (yet to be written) Wilderness plan. The adoption of language limiting the use of established equipment and techniques will limit the ability of the state to monitor and manage wildlife, making it difficult to compare historic data collected prior to wilderness designation. Specific wildlife management activities should be analyzed in the RMP with regard to anticipated state management actions and appropriate use of equipment. In addition, a listing of critical management activities should be presented and analyzed as potential wildlife management actions to be conducted as the need arises.	We have added specific authorizations for wildlife management actions in wilderness identified by NDOW during the planning process where they were consistent with management of lands as wilderness. We are committed to working closely with NDOW in the future in order to effectively manage wildlife populations and habitats and are confident that any future required site-specific analysis can be completed in a timely manner. The Proposed RMP creates no restriction on aircraft surveys, as BLM has no jurisdiction on airspace.
166	BLM should commit to undertake systematic studies and management actions necessary to improve the aquatic systems in the NCA. Fifty-four percent of the aquatic ecosystems within the NCA are functioning at risk or non-functioning, which has a	Systematic studies are needed evaluate the effectiveness of the RMP. Chapter 9 has been added to provide an overview of how the planning, implementation, monitoring and evaluation process will operate in the future

Appendix N: Comments and Responses

Fish and Wildlife

Section 2: Comment Summaries and Responses

#	Comment	Response
	huge impact on the integrity, and population viability of wildlife. dRMP at 3-32.	to assure that the objectives in the RMP will be achieved.
167	We support managing streams to meet the life history requirements of LCT. While we prefer permanent road closures within the vicinity of Mahogany and Summer Camp creeks within the Stanley Camp Pasture, we strongly support a seasonal closure to protect LCT spawning habitat. Road closures in these riparian areas would greatly enhance the ability to recover LCT in this region. Also, we recommend removal of nonnative fish species and/or stocking listed native species for recovery purposes.	Neither permanent nor seasonal road closures are included in the proposed RMP for this area. There are provisions for future closures, either permanent or seasonal, if monitoring documents impacts from human use. There is also a provision that additional restrictions to human uses could occur, including closure to camping, if documented impacts to the trout occur. Finally the plan encourages the development of off-site recreation facilities on private and nearby tribal lands as a means of reducing recreational use within the Mahogany Creek watershed. Removal of nonnative species and stocking of native species would be consistent with decisions in the Proposed RMP to recover populations and improve habitats of all special status species.
168	Page 3-39. Table 3-15: The North Fork of Battle Creek needs to be added to the table under LCT since it is currently occupied habitat.	The suggested modification has been made.
169	Page 3-22. Table 3-7: We recommend changing the title of the Species of Concern section on this table from "...that may occur..." to "...that are known to occur..."	The suggested modification has been made.
170	Page 3-38. Table 3-14: For the spring snails under Candidate Species, please clarify that the "proposed" designation pertains specifically to BLM status.	The suggested modification has been made.
171	Because of the expected increases in visitation to the NCA, we recommend activities within sensitive species habitat be closely managed and monitored to ensure adverse effects to these species are avoided or minimized. A comprehensive adaptive management program will allow for data collected through monitoring to inform the decision making process when addressing issues within these areas.	The Proposed RMP includes an adaptive management approach. This is contained in section 9.2 in Volume 3.

Appendix N: Comments and Responses

Visual Resources

Section 2: Comment Summaries and Responses

#	Comment	Response
172	Page 2-35 2.7.14 Visual Resources: we have trouble with the areas as classified for the following reason. The whole area has an extremely wide view-shed and generally clear air. Therefore one can easily see extremely long distances. The visual intrusions in one classified area will be readily visible from other areas that have been classified more stringently. The way you have delineated the view-shed allows visual intrusions in the Class III areas to impact Class I and II areas. The classification must be redone with this in mind.	As outlined in decision VRM-2, all of the planning area will be designated as either Class I or II to protect the visual resources of the area.
173	Guarding the viewshed of the emigrant experience is the chief goal of management, so that visitors of today and tomorrow will be able to see a view as much like that of the first settlers as possible. Careful criteria should be established for assessing, inventorying, and studying Emigrant trail remnants, and for managing the viewsheds to retain that unique emigrant experience.	BLM recognizes the need for retaining emigrant trail viewsheds and establishing criteria to guide management actions. These management actions are discussed in Section 8.2.14.2 of the proposed RMP.
174	Any and all signing will impair the realization of Objective 1, "To provide a primitive and natural setting for visitors" and will negatively impact the spirit of the intent of the Act. Keep any new signage within the NCA would be prima facie contrary to the letter of the Act mandating the preservation of "an unaltered setting". Adding signage to the NCA would be a big step in the direction of turning it into a "park", considerably lessening the opportunity to experience a sense of "risk, challenge and adventure" and destroy the very qualities that justified the creation of the NCA in the first place.	Management direction under the proposed RMP would focus on retaining the wild and undeveloped character of the planning area. Off-site methods of public outreach and interpretation/education would be emphasized, such as maps, driving guides, websites, self-guided tours, and informational exhibits located near the entry points of the NCA boundaries. The increased use of volunteers and BLM presence would also help to provide information in the absence of developed facilities. Facilities, signage, and road upgrades within the NCA would be kept to a minimum, and partnerships would be pursued to provide visitor services outside the NCA boundaries. Activity level planning would determine the specific details of site development, interpretation or other visitor facilities. Road maintenance levels and directional signage would also be handled through the implementation of the transportation plan.
175	Lands should be placed in protective VRM categories I and II, to protect their high value as wild lands.	As outlined in decision VRM-2, all of the planning area will be designated as either Class I or II to protect the visual resources of the area.

Appendix N: Comments and Responses

Water Resources

Section 2: Comment Summaries and Responses

#	Comment	Response
176	Livestock grazing is the primary (and often the ONLY) cause of water quality degradation on most BLM lands, except for a few localized instances near hot springs. We ask that you conduct extensive water quality sampling during periods when livestock are present on the affected lands, as part of this RMP effort. BLM must assess the impacts of livestock on the diminishment of surface flows of springs, seeps and riparian areas of the affected lands.	Water quality and related compliance issues are the purview of the State of Nevada Division of Environmental Protection (NDEP). The Bureau of Land Management, through this plan, has identified several sensitive aquatic habitats and water quality management objectives to support those habitats requirements (Section 8.2.15.2). The BLM's commitment to monitoring is demonstrated in Section 9.6 and is further delineated at the activity planning and authorization level.
177	2.4.15 Water Resources. Objective 2 should clearly state the wording in NRS about camping near springs. This part is explicit and often violated and should be made perfectly clear here.	Water Resources Objective 2 deals specifically with the direct use of water. As presented in the comment, camping near springs is an indirect use of water, therefore it is addressed under the Recreation section. The suggested language can be found in decision REC-2.
178	I DO NOT FEEL THAT BLM SHOULD WREST CONTROL OF THE STATE OF NEVADA'S (WATER) FROM THE STATES HANDS. SINCE THE SUPREME COURT HAS DECIDED THAT ANY LAND TO WHICH SOMEONE HAS A CLAIM, IS NOT, THEREFORE, PUBLIC LAND, IT WOULD SEEM THAT THOSE WATER SOURCES WHICH ARE PART OF MINING CLAIMS OR GRAZING ALLOTMENTS WOULD BE EXEMPT FROM FEDERAL MEDDLING. THE 9' CIRCUIT COURT DECISION THAT STATED THAT A HOLDER OF A MINING CLAIM HAS A REAL PROPERTY INTEREST, WOULD SEEM TO CONCUR THAT WATER ASSOCIATED WITH CLAIMS OR ALLOTMENTS WOULD BE, FOR THE INTERIM ANYWAY, NOT AVAILABLE.	Nothing in this plan will impact Valid Existing Rights. This has been added as an overall Program Planning Criteria in Appendix A. The Bureau of Land Management has long recognized the State's regulatory authority to administer waters within their boundaries (BLM Manual at 7250.06 1984). All planning decisions within this document must be in compliance with the State of Nevada's Water Law. The plan further states that where a need for water is identified, the Bureau will comply with State Water law to secure a water right.
179	In the Common to All Section 2.4.15.3, private Water Rights need to be recognized and a goal written to protect private water rights.	Please see the response to comment 832. The Bureau of Land Management has long recognized the States regulatory authority to administer waters within their boundaries (BLM Manual at 7250.06 1984). Nothing within this plan will attempt to change that. A goal of protecting private water rights is beyond the scope of this document and is a regulatory responsibility of the Nevada State Engineer.
180	The Sierra Club strongly urges the BLM to include acquisition of water rights to protect the biotic integrity of hot springs which support the survival of endemic desert dace and snails and other animals and plants.	The Winnemucca Field Office (WFO) has already taken measures to secure the habitat for the desert dace and the endemic hydrobiid snail. In 1992 the WFO, working through the Nature Conservancy, purchased a conservation easement that included a water management plan for the sensitive habitat found within the Soldier Meadows area. Although actual

Appendix N: Comments and Responses

Water Resources

Section 2: Comment Summaries and Responses

#	Comment	Response
		water rights were not purchased, the water management plan prescribes how these waters may be used with the expressed intent of protecting and conserving the habitat of the desert dace and the endemic hydrobiid snail.
181	No water rights takings should be allowed. Water use, including but not limited to stock water use by existing water rights holders needs to be protected. When streams, springs or other water sources are fenced, there should be other measures available for the water rights holder to access the use of their water.	Continuation of existing management regarding water rights is included under all alternatives. BLM would continue to file for water rights through the State of Nevada to support uses consistent with this plan that help to achieve resource management objectives and maintain healthy and functioning riparian and upland systems (Decision WATER-7).
182	The Sierra Club strongly supports the "common to all alternatives" direction to manage water quality to meet the life history requirements of populations of LCT. However, we found no conservation measure (except currently unsuccessful Best Management Practices prescriptions) which would accomplish this direction, including no BLM commitment to actually monitor water quality in the 12 watersheds mentioned on p. 2-13 on an annual basis to determine if this goal is achieved or not. More information on how the BLM intends to achieve this goal/direction should be included in the final EIS/RMP.	The BLM will continue to employ Best Management Practices (BMPs) at the Resource Management Planning Level. BMPs are an iterative process that allows management to accommodate changes on the landscape, without the need to amend the Resource Management Plan. As actions are proposed, specific water quality concerns are identified. During the development of the activity plan (to support the proposed action) site specific BMPs can be/are created to reduce the level of impact. It is important that these actions take place at the activity plan level so that the BMPs can be tailored to the individual action. The variety of landscapes across the planning area demonstrates why BMPs must be prescribed at the activity level rather than "canned" within a Resource Management Plan. Activity level planning is currently ongoing that will address grazing within 6 of the 12 LCT watersheds. The BLM's commitment to monitoring is demonstrated in Section 9.6 and is further delineated in the activity plans and authorizations.
183	I believe that any water improvements that are in place should be left in place and if anything, improved upon. This is essential to offset the exploding under managed, non-native feral horse population that has had an unnaturally heavy impact on the natural water and native wildlife forage resources of the region.	As stated in decision GRAZ-6, "Existing authorized structural rangeland projects would be maintained where beneficial to resource values." In addition decision GRAZ-7 states "All spring developments would be modified where necessary to maintain, improve, or restore the biotic

Appendix N: Comments and Responses

Water Resources

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
184	The plan may not exclude holders of a valid water right issued pursuant to Nevada Revised Statutes (NRS) chapters 533 and 534 from accessing, maintaining or improving permitted points of diversion or water conveyance facilities. The plan may not exclude owners of dams from accessing, maintaining, improving or removing recognized structures pursuant to NRS chapter 535. ALL water improvements must be permitted pursuant to NRS chapters 533 and 534 and possibly chapter 535. All abandoned or deficient wells on public property must be plugged in conformance with Nevada Administrative Code (NAC) and NRS chapters 534.	integrity of the spring system in accordance with BLM Technical Reference 1737-17. These spring developments would also be modified to provide water for wildlife at ground level adjacent to the spring source." Additional water developments may be considered where resource conditions indicate a need. The enabling legislation that created the NCA and associated Wilderness Areas explicitly recognized and protected all valid existing rights that occurred in these areas. Therefore, the exclusion of access or maintenance associated with a valid existing right is not contemplated by any of the planning decisions within this Resource Management Plan. Where these points of diversion or conveyance structures occur in a Wilderness Area, the access routes and maintenance routines will be identified in the Wilderness Management Plan.

Appendix N: Comments and Responses

Lands and Realty

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
26	The transmittal letter in the Draft states that "Lands affected ..include only those BLM administered..." Most of the private holdings in the planning area are significantly affected by the NCA act and by this plan. That should be acknowledged in the final plan and any other statements to the contrary should	Objectives and decisions in a BLM RMP only apply to public lands within the planning area. It is true that activities and uses on public lands may affect private lands. The Proposed RMP includes provisions for obtaining easements or re-routing roads and trails that cross private lands. The Plan also includes decisions that would maintain opportunities for acquisition of rights-of-way to access private lands. Consideration of the impacts of plan actions are included in the Socio-Economic sections of Chapter 4. The Act included provisions, through references to other legislation, for the continued access to rangeland improvements for maintenance and reconstruction. The Proposed RMP includes no additional restrictions on that access. None of the specific roads mentioned in the comment would be closed in the Proposed RMP. Decisions SIGN-1 and SIGN-3 in the Proposed RMP provide for flexibility in signing approach, location and format.
185	Eliminating established utility corridors within the plan area, as proposed in Alternative A, also will render the remainder of the corridors outside the NCA unusable. Will alternate corridors in non-NCA areas be created and existing RMP's be amended to reflect these new corridor locations?	See decision LAND-7 in the proposed RMP. This decision retains the existing utility corridors.
186	Within the Lands and Realty Management section on page 4-32, the EIS/RMP states "...no major utilities are planned for the subject areas and the remoteness of the subject area does not lend itself to development." While Sierra has no facilities planned within its 10 year planning window it does foresee the need for a 345kV or higher transmission line from it's Valmy Power plant to Northern California/Southern Oregon area sometime in the future.	See decisions LAND-3, LAND-4, and LAND-7 in the proposed RMP. Because of the juxtaposition of Wilderness Areas in the planning area, it appears doubtful that a major transmission line could be routed through most of the planning area while avoiding Wilderness Areas or impacts to the Applegate National Historic Trail.
187	Protect and safeguard, and otherwise not infringe upon DRI's pending land purchase from BLM.	The proposed purchase is outside of the plan area, so it would not be affected by the plan.
188	UNDER ALT. A, NON-ACCESS RIGHT OF WAY SOUNDS LIKE AN IMPOSSIBILITY; AREN'T THEY MUTUALLY EXCLUSIVE?	An example of a non-access right-of-way would be one for a power line only, that does not include an access road.
189	1. Why is the utility corridor so wide (2.75 miles) ??? 2. Rights-of-way should be only along existing transportation routes. This isn't mentioned. 3. Assurance needs to be given that there will not be any overhead transmission lines within the NCA. Not only would there be a visual impact and subsequent loss of	1. The utility corridor is 2.75 miles wide for consistency with the existing corridor which is 2.75 miles wide. 2. It is not always practical or possible to place right-of-way along existing transportation routes. Placing them there could violate visual resource management objectives or other resource management objectives. Each

Appendix N: Comments and Responses

Lands and Realty

Section 2: Comment Summaries and Responses

#	Comment	Response
	values, but also potential impacts on sage grouse populations.	application will have to be analyzed on a case by case basis. See decision LAND-4 in the proposed RMP. 3)See decisions LAND-3 and LAND-4. Site specific analysis would be completed prior to the issuance of any new ROW that would include consideration of visual and other resources.
190	Property owners within and immediately adjacent to the NCA and wilderness areas are extremely vulnerable to management actions undertaken by BLM, and public pressure. Although the term "willing seller" is used in the DRMP, we have seen where unwilling sellers become "willing," it is just a matter of time. Please do not set the stage for BLM management action, in concert with targeted public pressure, to lead to the eventual sale of private land. BLM can respond to those outside forces in a manner that properly sets the stage: BLM is a good neighbor and will seek solutions avoiding adversarial situations, wherever possible.	See decision LAND-5. BLM cannot control outside influences that may induce a seller to hold or dispose of their private property.
191	BLM's planning process must sharply limit new utility corridors and strengthen environmental protection for all rights-of-way on these lands. These corridors open the area for a proliferation of energy developments, and have significant environmental impacts that are directly counter to the goal of restoration. Power lines dissect wildlife habitat, provide raptor perches, and result in increased predator travel corridors and weed spread. Current use should be limited during sensitive nesting, fawning, wintering or other periods of use for all native wildlife and impacts from spreading exotic species onto surrounding lands assessed. Criteria for revocation of rights-of-way and a bonding requirement if environmental harms occur (weed spread, significant wildlife disturbance) must be established by this RMP. The need to preserve wild untrammelled vistas, primitive and undeveloped wild land settings and the darkness of night skies must be the guiding principle in any right-of-way issuance or utility corridor consideration.	See decisions LAND-3, LAND-4 and LAND-7.
192	The Preferred Alternative, Alternative B causes Sierra Pacific Power Company concern. This alternative limits a section of an existing utility corridor to buried utilities only. In short this action would nullify the corridor and the action is, in practice, the same as if the entire corridor were eliminated. -The cost to bury lower voltage transmission lines, 60kV to 230kv, is roughly 7 to 10 times more costly. -The three mile section of corridor limited to underground utilities would cost utility customers in the neighborhood of \$6,000,000 to \$10,000,000. -An above ground installation would cost on the order of \$600,000 to \$1,000,000.	See decisions LAND-3, LAND-4 and LAND-7 in the proposed RMP. Future utilities could be considered in the planning area consistent with the objectives following site specific NEPA analysis.

Appendix N: Comments and Responses

Lands and Realty

Section 2: Comment Summaries and Responses

#	Comment	Response
	<p>-At the higher voltages, 345 kilovolt (kV) and higher burial is not considered prudent utility practice for reliability and operational reasons. -Current technology and utility reliability standards combine to make underground installation of voltages above 230kV impractical. -Buried facilities in the upper voltage classes are relatively new and have not therefore been field-tested. -Transmission lines of 230kV and higher, or bulk transmission lines, are used to transfer large amounts of power. A loss to a single line can have a devastating impact to the electrical stability of an entire region. The loss of an underground line is much more difficult and time consuming to repair than its above ground counterpart. A single outage of an underground line could take from days to weeks to repair leaving the electrical grid substantially weakened and potentially non-functional.</p>	
193	<p>I own ½ of the water rights of an unnamed spring. It is important that we have access via the spring road for the maintenance and cleaning of the spring, and pipeline. I request that the existing spring road be left open in the area outside Wilderness.</p>	<p>As shown on the OHV Designation Map (Map 8-3), the mentioned road would remain open in the proposed plan.</p>
194	<p>VOLUME 2 APPENDIX A. Please include Executive Order 12630, signed by President Ronald Reagan on March 22, 1988. This EO deals with private property and requires each federal agency to review its regulations before they are issued in order to "prevent unnecessary takings and account in decision making for those takings that are necessitated by statutory mandate." This review of federal regulation is called a "Takings Impact Analysis." Has the BLM done such an analysis as part of this DRMP/DEIS?</p>	<p>Executive Order 12630 has been added to Appendix A and will be complied with as necessary. BLM does not find that any action in the Proposed RMP would create a taking of private interests.</p>
195	<p>Please change all statements in the DRMP/DEIS referring to private lands as "not subject to decisions contained in this planning document." (DRMP, page 1-3). Those lands are affected, and in some cases, such as wildland fire prevention or water supply, the effects can be direct and significant.</p>	<p>There may be indirect affects that will have to addressed on a case by case basis.</p>
196	<p>Alternative C is preferred for the utility corridors and ROW's for buried and aboveground facilities. The communities of Gerlach, Empire, surrounding areas and private property owners within the NCA should have the opportunity to pursue the use of renewable energy. They will need associated corridors and ROW's.</p>	<p>See decision LAND-4. Corridors shouldn't be confused with rights-of-way. Corridors are merely a planning designation of the preferred location for rights-of-way. However, not all rights-of-way have to be located within a corridor.</p>
197	<p>Please reword Objective 4 on page 2-14 to a more positive tone: "To allow development and establishment of new private interests on public lands when they are consistent with the resource goals of the planning area." This may have the most</p>	<p>The wording was changed in the proposed RMP (Section 8.2.16.1) to reflect a more positive tone.</p>

Appendix N: Comments and Responses

Lands and Realty

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
	bearing on new recreation/nature study/heritage tourism opportunities that take advantage of the cultural and natural setting.	
198	There needs to be language to facilitate the purchase of public rights of ways across private land and language to facilitate the relocation of roads around private land if a public right of way can not be purchased. Condemnation of private property should not be allowed. One specific area of concern is the Summer Camp and Stanley Camp private 40-acre parcels. Under all alternatives except A, the public access is right through these private parcels. The road needs to be moved so that the landowner has the exclusive enjoyment of their deeded land, and can enforce a no trespassing policy without enticing the hue and cry of the public.	See decision TRAN-9 with regard to access across private parcels. Each issue of access across private land would have to be addressed on a case-by-case basis. Some access routes across private land may be "public access" that is the responsibility of the State and/or local government.
199	A primary goal of lands and realty actions should be no net loss of public lands in the planning area.	The Act prohibits the disposal of any public land within the National Conservation Area.
200	Please change all statements in the DRMP/DEIS referring to private lands as "not subject to decisions contained in this planning document." (DRMP .page 1 -3). Those lands are affected, and in some cases, such as wildland fire prevention or water supply, the affects can be direct and significant.	The referenced statement is correct in that BLM cannot impose decisions on private land. There may be indirect affects that will have to addressed on a case by case basis.
201	We have property which lies within the Black Rock Desert-High rock Canyon emigrant Trails area. How many acres of private land that we own is included in this Black Rock Area? Does the government plan to purchase this land? What are our potions regading this property future use?	Two of the three parcels are likely to be within or partially within the NCA boundaries. The RMP/EIS does not propose any changes to the status of any inholdings within the NCA. Decision actions proposed in the RMP/EIS only apply to public lands. There is no plan to purchase any private lands within the NCA, however, BLM will entertain purchasing lands with high resource values if BLM is approached by the landowner indicating they wish to sell that land. See decisions LAND-1, LAND-2, LAND-4 and LAND-5.
202	We do not support the implication of the text on page 2-14 that access to wilderness inholdings is conditional, only "allowed for the reasonable purposes for which the property is held or used." It is not within the BLM's authority to define or dictate what is a "reasonable purpose" of private property. That is the County's jurisdiction. Traditional private access, if nothing else pertains, at least has some son of protection through prescriptive easement. There is nothing in the enacting legislation that grants power to BLM to interfere with private inholdings. Most wilderness legislation includes the "no buffer" language. This legislation uses the "no buffer" language for the NCA but does not apply it to the 3 wilderness areas outside the NCA. Nonetheless, BLM	See decisions LAND-1 and LAND-2. Language for this decision came directly from BLM's wilderness regulations found in CFR 6300, which outlines how BLM authorizes motorized access to inholdings completely surrounded by designated wilderness. The mentioned properties are surrounded by designated wilderness and BLM can only authorize motorized access to the properties as it existed at the time of designation.

Appendix N: Comments and Responses

Lands and Realty

Section 2: Comment Summaries and Responses

#	Comment	Response
	authority should end at the boundary line between public and private rights. Protect and safeguard DRI's vehicular access to private property in the Mary Sloan Basin and property near the Quinn River to the west of Lower Jackson Creek Ranch.	
203	As a secondary argument, we do not support the requirement for a private in holder to obtain a permit to use motorized or mechanized vehicles for routes which may be RS 2477 rights of way. The RS 2477 right derives from historic use of a route, or other conveyance, prior to the passage of the Federal Land Policy and Management Act in 1976. The right is self asserting and does not require a permit for compliance. Please identify those routes which may have RS 2477 rights attached to them - they should be exempt from permit requirements.	Not all routes across public land qualify as RS2477 rights-of-way and there are specific requirements for the right-of-way to be realized. It's not incumbent on the BLM to identify RS2477 rights-of-way, but it's the responsibility of the entity that believes they have met the requirement for such a right-of-way. Currently the BLM has a moratorium on accepting RS2477 right-of-way assertions. Since rights-of-way cannot be granted in Wilderness Areas, access routes can only be authorized in them by issuance of a land use permit. See decision LAND-1.
204	The Draft Environmental Impact Statement failed to map all existing power lines and existing rights of way and no comparison of existing and potential impacts was shown. Visual simulations need to be produced showing a realistic impact of adding facilities to the existing corridors.	All locations of known rights-of-way within the planning area were identified on Map 3-14. While there are other ROWs near the planning area they are entirely outside the planning and not affected by decisions contained in the proposed RMP. Visual simulations could be used on a case-by-case basis, but are not included in the EIS process because there are no current or projected projects that would require that technique in or near the planning area.
205	We strongly oppose the direction (p.2-14) "which would grant utility rights-of-way 'outside of Wilderness,' in support of valid existing rights." This direction appears to permit a powerline through the heart of the NCA viewshed (outside the emigrant trail corridor). If this is not the BLM intent, then this statement should be clarified, revised, or omitted, since it would not be in compliance with the NCA Act.	See decisions LAND-3, LAND-4 and LAND-7 in the proposed RMP. Any proposals for rights-of-way within the NCA would have to be consistent with achievement of the resource objectives of the planning area and be subject to site-specific NEPA analysis that includes public involvement.
206	Please add the statement to "Lands and Realty" text common to all alternatives (pages 2-14, 15): Condemnation will not be used to acquire private parcels within the planning area.	See decision LAND-5 in the proposed RMP. Our intent is to acquire private lands or property interests only through agreement with willing landowners. The NCA Act does not provide for condemnation.
207	I object to the following statement in the Lands and Realty "Common To All Alternatives" description: "Proposed utility rights-of-way could be granted, except as specifically excluded, where in conformance with the objectives and decisions of this plan, law, regulation, policy, and the intent of the legislation. Rights-of-way would be granted, outside of Wilderness, in support of valid existing rights." That statement is so broad that it includes everything. (I see no exclusions in the Draft.) I believe that the	See decision LAND-4. Under-grounding of electrical lines is not feasible over long distances due to physical and monetary constraints. See decisions LAND-2, LAND-3 and LAND-7.

Appendix N: Comments and Responses

Lands and Realty

Section 2: Comment Summaries and Responses

#	Comment	Response
	<p>RMP should not prohibit power lines from being brought into occupied private inholdings, but I believe the plan should include constraints that would minimize the impact of such power lines on the NCA and restrict utility corridors to the periphery of the NCA and along the Soldier Meadows Road whenever possible. Power lines should be underground. Other than that, I support the Draft's Alternative B. I see no real reason to interrupt the utility corridor south of the railroad track as shown in Alternative A. If a utility line were to be run through that area, it could be designed and constructed in a manner that had minimal impact on the trail and I trust that the BLM would ensure that.</p>	
208	<p>The lands and Realty Management sections on pages 4-32 and 4-66 conflict.</p> <p>-On 4-32 the EIS/RMP states, "Retaining the two existing utility corridors would accommodate existing utilities and encourage the placement of future utilities within them."</p> <p>-Page 4-66 states, "Eliminating two existing utility corridors, but not existing utilities, would protect the visual quality from impacts that would be caused by concentrating utility use in these corridors."</p> <p>The point needs to be made that utilities don't necessarily choose to utilize corridors as they can cause operational constraints to the electrical system. Rather, utilities have been encouraged by federal agencies over the years to "concentrate utility use" in corridors thus causing the visual impacts which appear to be the EIS/RMP's concern on page 4-66</p>	<p>The two sections cited are not contradictory since they are the analysis of impacts to two separate resources, Lands and Realty, and Visual Resources in two separate alternatives, No Action and Alternative A. The analysis in Visual Resources is not necessarily a concern, merely a statement of impacts to that resource.</p>
209	<p>BLM must not intrude in any way on private property, nor should private property owners need a permit to access their property whether by existing roads or by the creation of a new road.</p>	<p>The BLM has no authority to affect management on private land.</p> <p>Vehicle access is restricted in Wilderness areas and the Federal Land Policy and Management Act prohibits the issuance of rights-of-way in Wilderness, so a permit is required to authorize access to private land or interests in land.</p> <p>The Federal Land Policy and Management Act requires a right-of-way for construction of a new access road.</p>
210	<p>BLM must analyze the suitability of any existing/pending communication sites as part of the RMP process.</p>	<p>See decision LAND-4. Site-specific inventories would be completed prior to the issuance of any new ROW's for communication sites.</p>

Appendix N: Comments and Responses

Mineral Resources

Section 2: Comment Summaries and Responses

#	Comment	Response
211	Development of geothermal and mineral facilities should not be allowed. Such development would require roads, vehicles, disturbed ground, numerous buildings, 24-hour year-around lights, constant noise, powerlines, and more roads. This development would degrade aesthetics of the area and impact hot springs and connected water tables in the area, including the springs in Gerlach. These negative impacts outweigh the potential benefits from geothermal and mineral development.	The only area within the planning boundary, considered for geothermal development is the South Playa area. Decision MIN-2 and MIN-7 would apply. Many of the hot springs in Gerlach are on private lands not under federal jurisdiction. Much of the federal lands within the Gerlach Known Geothermal Resource Area, is open to geothermal leasing and development, and is outside of this planning boundary. Current Administration policy is to prioritize energy development, especially alternative sources like geothermal. Most geothermal facilities would be located near Gerlach, an area already impacted by commercial and residential development. (Note: A modification to MIN-7 could be, open to new leasing with "no above ground facilities" allowed.)
212	On p. 3-48 information regarding " Active Mining Claims and Associated Grandfathered Mining Permits" should be updated in the DEIS since the deadline for mining notices (January 20, 2003) has passed.	Since publication of the DEIS, three mining claims have been dropped in the Pahute Peak Wilderness and have been removed from Table 3-17. Three mining notices have been extended and are active. One mining notice in the central Black Rock Range has expired, but remains open pending completion of reclamation.
213	Mining and oil/gas development should only be a short-term habitat conversion. Land reclamation, initiated concurrently with mining operations, can restore sagebrush habitat for birds. Avoid placing mines, oil and gas drill sites, sand or gravel pits, geothermal sites, and roads in or next to sensitive habitats such as grouse lek, breeding, or wintering habitat; raptor nest sites on cliffs and outcrops; or riparian areas, springs, and other wetland habitats.	With the exception of small mining operation (less than 5 acres of disturbance) all energy and minerals developments are subject to the NEPA analysis where mitigating measures are developed to protect sensitive habitats. If mitigating measures cannot be developed operations could be denied. Most operation are short term and are bonded to assure reclamation is completed upon closure of the operations.
214	All areas outside the NCA and Wilderness boundaries, but within the planning area should be open to the Mining Claim Act, Mineral Leasing Laws, 1970 Geothermal Steam Act, and Mineral Materials Act. The legislation includes NO BUFFER ZONES. This is the intent of the legislation and BLM must adhere to it. The VRM classes will already add additional restrictions to these uses outside the NCA and Wilderness boundaries. The communities of Gerlach, Empire, surrounding areas and private property owners within the NCA should have the opportunity for uses of renewable energy and associated corridors and ROW's. New technology is being developed daily and the door should not be closed to future technology and uses.	In addition to the NCA and Wilderness Areas designated by Congress, this planning document addresses other federal lands considered to be an integral part of the Black Rock System. Increases in conflicting public demand dictate a planning document that addresses uses on these other federal lands. This planning document does not create BUFFER ZONES for lands surrounding the NCA and Wilderness Areas. VRM classifications in the proposed RMP are in conformance with the mineral leasing categories in the proposed RMP. These other federal lands addressed in the planning document contain low potential for locatable minerals and moderate to high potential for mineral materials. Governmental use of mineral materials in some of these other federal lands will be allowed. The South Playa area contains high potential for geothermal resources where leasing with "no surface occupancy" (or "no above ground facilities") will be

Appendix N: Comments and Responses

Mineral Resources

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
		allowed. This would conform to the current Administrations^ emphasis on development of alternative energy sources.
215	1) How about a Management Area-wide soils-type assessment in order to map potential cheatgrass conversion areas. This would help in crafting an effective fire management plan. 2) All dune areas need to be studied and protected until / unless human impacts are shown to be non-impairing of resource values.	BLM and the National Resources Conservation Service have completed soil surveys for the entire planning area. These surveys provide the basis for future project and activity planning including fire plans. The dune areas would be closed to OHV use except on designated routes.
216	I recommend that Soils management be included in the RMP. The dunes are a special worry for me, since they are now being damaged. I think the dunes should be covered in the section on soils. I also think the playa should receive special consideration in the soils section.	Application of Land Health Standards to all uses and programs provides consideration of soils in the Proposed RMP. Each set of Health Standards includes a specific soils standard and indicators or criteria that define what the soils standards mean. During development of the plan soils experts found the standards to fulfill the needs of soils management for the planning area.
217	We found no mention of air quality, even though many of the actions will increase visitor use. Increased visitor use will increase dust and should be analyzed.	Impacts to air quality from each alternative are considered in Chapter 4. The air quality sections are contained in sections 4.2.1.17 through 4.2.4.17 for each alternative. A section on air quality decisions has also been added to the Proposed RMP and can be found in section 8.1.20 in Volume 3 of the Final RMP/EIS.

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
218	Page 2-36 2.7.18. Recreation Zones: We object to zoning for the same reasons we object to the delineation of visual impacts. The entire NCA should be managed for conservation values. Such zoning will automatically increase visitor use and therefore will increase impacts to the Conservation Area. Zoning will impact the wild, pristine, remote, undeveloped character. In addition, we object to the lack of limits on fossil collection using non-motorized hand-tools. Fossils are a non-renewable resource, and may become legally protected in the near future. We should not allow this resource to be squandered, especially in an area with a legislated conservation designation.	<p>Zoning is a management tool for use by the managing agency, which is not intended to change the visitor experience or the resource condition. They are used to help maintain the diversity of resources and related experiences that currently exist. Zones describe the character of visitor facilities, activities, etc., which are permitted within them, and are based on existing conditions or desired resource conditions. The management zone boundaries have been adjusted based on public input. Please see Decision REC-15, Map 8-13, and zone descriptions, found in Appendix B of this Plan.</p> <p>Collection of minerals, rocks, and fossils would be limited in the planning area. Limits could only be waived for specific reasons and would require a permit (see decision REC-12).</p>
219	Many comments urged BLM to protect the wild and undeveloped character of the NCA by emphasizing off-site outreach techniques, limiting or doing without new directional signs, kiosks or on site interpretation, and minimizing road upgrades. The State, counties and municipalities expressed the desire to promote recreation opportunities in their communities, to encourage cooperation between NCA management and the local communities, and to develop outreach and visitor services in some of their communities. Several comments urged BLM to develop specific specifications for on-site facilities, and requested an adaptive approach to placement or removal or facilities. There were also comments that expressed the need for sanitary facilities in some locations.	<p>Management direction under the proposed RMP would focus on retaining the wild and undeveloped character of the planning area. Off-site methods of public outreach and interpretation/education would be emphasized, such as maps, driving guides, websites, self-guided tours, and informational exhibits located near the entry points of the NCA boundaries. The increased use of volunteers and BLM presence would also help to provide information in the absence of developed facilities. Facilities, signage, and road upgrades within the NCA would be kept to a minimum, and partnerships would be pursued to provide visitor services outside of the NCA boundaries. Activity level planning would determine the specific details of site development, interpretation or other visitor facilities.</p> <p>When facilities are deemed necessary to protect resources or to provide opportunities for interpretation/education they would be limited to the Frontcountry zone, areas that currently have developed facilities, areas where monitoring indicates impacts to sensitive natural and cultural resources, where public safety concerns exist, where there is continual motorized trespass in wilderness, and where inadvertent damage related to uninformed visitor use continues. All facilities would be designed to be unobtrusive and aesthetically compatible with the landscape. Developments would not occur in designated wilderness, unless a specific resource concern arises. Existing interpretive and directional signage would be maintained until the completion of the signing plan.</p>

Appendix N: Comments and Responses

Section 2: Comment Summaries and Responses

Recreation

#	Comment	Response
220	<p>Based on the percentage of population increase, Nevada is the fastest growing state in the United States. Over 84% of Nevada residents aged 16 years old and older participate in outdoor recreation annually. Trail related outdoor recreation activities are very popular with Nevadans. Eight of the top ten outdoor recreational activities are activities that could occur on trails if trails are available (Nevada's 2003 SCORP). Over 29% of Nevada's residents (approximately 500,000) participate in off-road vehicle activities each year.</p> <p>Nevada's top eight outdoor recreation issues cited in Nevada's 2003 Outdoor Recreation Plan illustrate how the plan elements recommended above for inclusion in the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area (NCA) Draft Environmental Impact Statement/Resource Management Plan (DEIS/RMP) would be consistent with Nevada's SCORP.</p> <p>There is a growing need to protect, maintain, and increase public access to public lands for the greatest diversity of outdoor recreational users (issue # 1). There is a growing need to provide recreational trails and pathways throughout the state, in both urban and rural areas (issue # 3).</p> <p>Protection of natural, cultural, and scenic resources needs to be put in balance with users. Create opportunities for users to participate in the protection, i.e., site stewards - mandate that a majority of fees paid in a recreation area stay in that area for improvements and maintenance. Citizens acknowledge this as an investment and a way to participate in the conservation of these resources (issue # 4). Water resources must be protected to maintain the needed quantity, quality, and accessibility for public recreation. Recreation and wildlife depend on the limited water resources in Nevada (issue # 5). We need to encourage, fund and provide environmental, cultural, and heritage interpretation and educational programs and opportunities, especially outdoor opportunities, throughout Nevada (issue # 6).</p> <p>Nevada's growing population is placing an increasing demand on recreation resources and recreation suppliers at all levels, statewide. New resources need to be identified, acquired, funded, and developed (issue # 7). Existing levels of outdoor recreation funding are inadequate to meet the recreation needs of Nevada (issue # 2).</p> <p>Coordination and cooperation between public and private recreation providers at all levels is very important. More true support from private citizens, user groups, and governmental entities (local, state, and federal) are important partnerships to pursue (issue # 8).</p> <p>The Nevada Division of State Parks takes the position that public lands should be managed to meet the outdoor recreation needs of the residents of Nevada and the millions of out-of-state visitors that frequent the State annually while conserving the natural resource base that supports outdoor recreation activities on these lands. Public</p>	<p>Public Access would be provided through a network of roads and motorized trails (see Map 8-3). BLM will work in partnership with counties, state, and other private interests to maintain reasonable public access to the NCA. See Transportation decisions for specific details (pg. 8-2 and 8-3).</p> <p>Partnerships with local communities and governments would be established to assist in providing recreation services for the NCA and the surrounding areas (See decision REC-17 and VIS-1 through VIS-4).</p> <p>Trail, camping and OHV uses would continue under direction of the RMP. Trail opportunities could be developed in certain cases as discussed in decision REC-13. The National Desert Trail would be routed through the NCA and Wilderness (see decision REC-14). OHV use would be limited to designated routes, with the exception of the playa, which would remain open to vehicle travel.</p> <p>Volunteer opportunities will be available to encourage participation by NCA visitors and to implement important resource projects. The NCA manages user fees under the Fee-Demonstration Project, which was designed to keep user fees for management of the area where they originated (currently, fees are only collected from activities that require a special recreation permit).</p> <p>Impacts to water resources from recreation use would be minimized through the use of camping restrictions and site designations in areas that are experiencing recreation related impacts (see decisions REC-17 and REC-18). Vehicle camping could be restricted from portions of the Lahontan Cuththroat Trout area if alternative camping locations can be provided.</p> <p>The remainder of the NCA would be open to dispersed camping at least 1/2 mile from designated camping areas. Primitive campgrounds could be developed in areas experiencing adverse resource impacts, where opportunities for overnight use would be retained.</p> <p>A variety of outreach methods would be used to inform visitors about the resources and opportunities available in the NCA. Public safety would be emphasized. See decisions for Public Outreach and Visitor Services (page</p>

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
	<p>land management agencies should take proactive actions to accommodate visitors to public lands. This agency also believes that aggressive proactive management practices to accommodate visitor use occurring on public lands will result in a reduction of adverse impacts on the natural resources we all wish to conserve. One of the most important aspects of a proactive approach is to prepare visitors using the NCA to insure visitor safety. The Black Rock-High Rock Desert environment can be fatal to visitors who are neither educated nor prepared for the hostile environment that this area may become at times.</p> <p>It is also the belief of this agency that the vast majority of visitors to the NCA are law-abiding citizens who wish to comply with the laws. A proactive management approach is the best means to equip citizens to be law-abiding citizens. Well-informed law abiding recreationists become better conservationists.</p> <p>The emphasis on visitation and interpretation cited in Alternative C as amended provides the best elements of a plan consistent with Nevada's 2003 Outdoor Recreation Plan</p>	8-23 and 8-24).
221	<p>The State of Nevada's limitation on camping next to water should be applied – and enforced – uniformly through the area. Camp sites should be monitored and, when and if monitoring indicates resources are being damaged by camping, management actions should be escalated from “no action” to the least action that will stop the damage and allow the damaged area to recover.</p>	<p>The State of Nevada camping restrictions within 300 feet of springs would be adopted and enforced by BLM. Camping would be managed to provide opportunities for dispersed camping in most areas, but camping would be limited to designated sites in certain sensitive areas that attraction visitation. Please see decision REC-18 for specific areas where restrictions apply. Sites would only be designated outside these areas when monitoring indicates resource impacts. Sites could be designated or closed and restored to natural conditions. Alternate sites or primitive campgrounds may be provided in appropriate areas (see REC-17, REC-7 and REC-11).</p>
222	<p>We recommend not allowing recreational users to camp in or near the riparian areas of Mahogany and Summer Camp creeks or developing campgrounds within Stanley Camp Pasture. Restricting camping and other recreational uses within these riparian areas will greatly enhance the ability to recover LCT in this area.</p>	<p>Camping in the LCT area will be limited to existing sites. If monitoring indicates unacceptable resource impacts, sites would be closed and restored to natural conditions. If alternative opportunities can be provided on private or other public lands outside of the LCT watershed, overnight vehicle camping would be restricted. Please see decision REC-11 of the proposed RMP. No campground would be developed by BLM in the Stanley Camp Pasture as proposed in Alternative C of the Draft RMP.</p>
223	<p>Several comments expressed the value and importance of rockhounding as a recreational activity in the planning area.</p>	<p>Rockhounding would continue to be a legitimate recreational activity in the planning area. Decision PAL-3 in Section 8.2.5 proposes new collection limits and one area closure, as an effort to maintain rockhounding resources for future generations, and to minimize surface disturbing activities related</p>

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
		to rockhounding.
224	"By 2001, visitation for dispersed use and special recreation permit events had grown to nearly 60,000 (see Tables 3-25 and 3-26)." (page 3-59, Volume 1) It appears that table 3-26 shows total numbers of dispersed recreation visitors added together with special event visitors? If so, we request a separate table featuring the dispersed use.	Table 3-26 was changed to reflect this comment. The data in Table 3-26 represents visitation data for dispersed use only, which doesn't include special recreation permits.
225	Special orders for day-use only areas and restrictions on numbers and types of recreational activities can be implemented on a site specific basis without the zones. Dispersed camping should be allowed within the non-wilderness areas.	An adaptive management approach would be used to implement further restrictions on number and types of recreational activities (See Chapter 9). Existing BLM regulations would be enforced and the NRS statute that restricts camping within 300 ft. of springs would be adopted (See decision REC-2). Camping would be limited to designated sites in certain areas containing sensitive resources or experiencing adverse resource impacts (See decisions REC-17, REC-18 and map 8-4). With the exception of those areas listed in the decisions mentioned above, dispersed camping would be allowed throughout the planning area, within 1/2 mile of designated camp sites (See decision REC-16).
226	Several comments voiced concern over the decision to designate the NCA as a Special Recreation Management Area (SRMA). The significance of SRMA designation for area management was not clearly stated in the Draft EIS/RMP, which lead to comments from respondents who believed SRMA designation indicated a higher priority for recreation, possibly leading to development of visitor services, signage, increased enforcement, or unnecessary levels of bureaucracy.	During the development of land use plans, BLM policy requires SRMA designation for all areas with significant recreation management issues . In response to the comments received, the definition of a SRMA has been clarified to better represent the intent of SRMA designation within the NCA. The Special Recreation Management Area is a BLM administrative term used to define an area where significant recreation issues may require further planning and intensive management. Intensive recreation use, with related impacts and conflict, is occurring in these areas. Recreation related investments are required and focused in these areas. SRMA designation does not imply an emphasis on providing for recreation nor does it require any specific on the ground management, rather it recognizes the potential for recreation related impacts and enables BLM to address recreational use.
227	We find it difficult to analyze your data on Visitor use and data collection. We believe there are mistakes in this portion. 1. Page 3-59 3.17.1 "By 2001, visitation for dispersed use and special recreation permit events had grown to nearly 60,000 (see Table 3-25 AND 3-26)" 2. Page 3-75 3.19.4.1 "Total Visitor Days (for the same year 2001) for all SpecialRecreation permits are estimated at 77,695. This compares to the estimate of 63,803 Visitor Days for all of the non-SRP recreation."	The figures in Table 3-26 are based on monitoring data and the typographical error has been changed to reflect this comment and now reads nearly 70,000. The figures in Table 3-26 represent actual monitoring data for dispersed recreation. The recreation estimates found on page 3-75 are based on standard recreation economics estimation procedures for visitor days. The

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
	These statements conflict with others made in the same section as well as with some charts. These errors must be corrected.	difference in these figures is due to this estimation in the socioeconomic analysis and is negligible with respect to recreation management or economic impacts.
228	I would like to see the area remain open to dispersed recreation and camping. Restrictions should only be placed on use when a problem has developed. I do not want to see any more large scale events like Burning Man. They should be allowed to continue as long as they abide by the law, but no new events of that scale should be permitted.	Most areas would remain open to dispersed camping, with the exception of those areas mentioned in decision REC-18 and those areas experiencing unacceptable resource impacts. Large-scale permits would continue to be permitted, but would be limited in number, duration, and location.
229	The maps indicate that Front Country Zone extends north above the black county line. I suggest that the northeast red boundary be pulled back slightly from Black Rock Springs to allow more of a protective buffer for the dunes, the Trail and the springs from large scale events (similar to Map 2-35).	Zone boundaries were adjusted based on public input. Please see Map 8-13. Although the frontcountry designation on the playa extends to dune and hummock areas and to close proximity of Black Rock and Double Hot Springs, camping and vehicle travel would be limited to designated areas, which would help minimize use-related impacts to these resources. No large-scale recreation permits would be authorized within 5 miles of the Emigrant Trail. See map 8-14. Decision REC-25 would minimize use of the Northern playa, by first emphasizing use of the southern reaches of the playa by large scale special recreation permits.
230	There should not be any vehicle use in the dunes area.	Camping and vehicle travel throughout the dune and hummock areas would be limited to designated routes and campsites. If monitoring indicates excessive impacts as a result of camping related use the dunes and hummocks could be closed to camping. See decision REC-18, REC-19, and OHV-1.
231	Camping sites and areas should be managed to maintain their unimproved character (with the exception of the developed Stevens Camp). A monitoring process should be implemented to assess any degradation, and where this occurs the least intrusive mitigation action should be taken to allow the site to recover to its former condition. Building improved campsites, whether public or private, should be avoided until all other measures have been exhausted. The dune and hummock areas in the vicinity of Black Rock and Double Hot Springs are not only subject to camping but OHV use. They may require protection from both of these impacts. High Rock Canyon (not including Stevens Camp) attracts campers all through the canyon. Provisions may	Zoning is a management tool for use by the managing agency, which is not intended to change the visitor experience or the resource condition. They are used to help maintain the diversity of resources and related experiences that currently exist. Zones describe the character of visitor facilities, activities, etc., which are permitted within them, and are based on existing conditions or desired resource conditions. The management zone boundaries have been adjusted based on public input. Please see Decision REC-15, Map 8-13, and

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
	have to be instituted for camping at specified locations within the canyon where the least impacts will be made.	zone descriptions, found in Appendix B of this Plan. The State of Nevada camping restrictions within 300 feet of springs would be adopted and enforced by BLM. Camping would be managed to provide opportunities for dispersed camping in most areas, but camping would be limited to designated sites in certain sensitive areas that attraction visitation. Please see decision REC-18 for specific areas where restrictions apply. Sites would only be designated outside these areas when monitoring indicates resource impacts. Sites could be designated or closed and restored to natural conditions. Alternate sites or primitive campgrounds may be provided in appropriate areas (see REC-17, REC-7 and REC-11). Vehicle travel would be limited to designated routes, except on the playa.
232	I found the legends didn't necessarily match up to the map, on the stripped and polka-dotted areas on Maps 2-24 and 2-35.	Please see the corrected Map 8-14 for Special Recreation Permits in the proposed RMP.
233	Several comments disagreed with or questioned the utility, the boundary definitions for zones, and whether or not the use of zoning was within the intent of the NCA legislation and Wilderness designation. Several comments questioned the need to manage one area differently from another, since the entire area was designated as an NCA. One recurring theme of the comments was the thought that zones could undermine the primitive character of the NCA. Other comments suggested different boundary alignments; some wanted the Frontcountry zone located only in the South Playa and some included Steven's Camp or Soldier Meadows. Comments pertaining to specific road segments or areas around Stevens Camp and Soldier Meadows were also received.	Zoning is a management tool for use by the managing agency, which is not intended to change the visitor experience or the resource condition. They are used to help maintain the diversity of resources and related experiences that currently exist. Zones describe the character of visitor facilities, activities, etc., which are permitted within them, and are based on existing conditions or desired resource conditions. The management zone boundaries have been adjusted based on public input. Please see Decision REC-15, Map 8-13, and zone descriptions, found in Appendix B of this Plan.
234	Special orders for day-use only areas and restrictions on numbers and types of recreational activities can be implemented on a site specific basis without the zones. Although I support the use of large scale events on public land, one large scale event a month would put the local agricultural community out of business.	An adaptive management approach would be used to implement further restrictions on number and types of recreational activities (See Chapter 9). Existing BLM regulations would be enforced and the NRS statute that restricts camping within 300 ft. of springs would be adopted (See decision REC-2). Camping would be limited to designated sites in certain areas containing sensitive resources or experiencing adverse resource impacts (See decisions REC-17, REC-18 and map 8-4). With the exception of those areas listed in the decisions mentioned above, dispersed camping would be allowed throughout the planning area, within 1/2 mile of designated camp sites (See decision REC-16). Large scale permitted activities would be managed to maintain full public

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
		access during at least one-half of the primary visitor season (Memorial Day to Labor Day). Please see specific decisions for Special Recreation Permits on page 8-22.
235	Please consider providing maps, informational brochures, self-guided tours, and cautionary information at kiosks at each of the major entry points to the NCA. This is not proposed in any of the Alternatives, and would obviate the need for signs and interpretation within the NCA.	The installation of kiosks at the major portal areas was added as a decision, based on overwhelming public support.
236	The "front country" zone should be limited to the areas where "front country" concentrations of recreational activities now occur. Likewise, large events should be limited to the areas where they now occur. Camping and OHV travel should not be allowed in the dune and hummock areas. Only day use should be allowed in the Canyon. Only day use should be allowed in the other areas specified in Alternative A. The hot springs habitats at Soldier Meadows and Black Rock Springs should be protected from vehicular and other recreational impacts. Camping should be limited to designated sites between Soldier Meadows and High Rock Lake. Parties with more than 3 vehicles should camp only in designated areas, as in alternative A. The rock collection limits appear to be very high.	The frontcountry boundaries have been adjusted based on public comments to include only those areas already having developed facilities and those receiving the highest levels of use. Camping and OHV travel would be limited to designated sites/areas and routes within the dune and hummock areas. Camping in dunes could be eliminated altogether if monitoring indicates unacceptable impacts. The hot springs at Soldier Meadows would have better protection as a result of implementing the SMAP, designating vehicle routes, allowing camping in designated sites only, and rerouting the access road to the springs. Vehicle impacts at Black Rock Springs would be minimized through route designation. Limits on group size would be implemented if monitoring indicates impacts related to group size. The rock and mineral collection limit of 25 pounds per day and one piece up to 250 pounds is thought to be adequate to minimize resource depletion and major surface disturbing activities related to rockhounding.
237	I do not favor building a campground near Soldier Meadows, but I do favor building a small, inconspicuous solar toilet there which campers can use. This is necessary because of water pollution from human waste.	Implementation of the Soldier Meadows Activity Plan would include the installation of a toilet near Soldier Meadows hot springs and camping area. All facilities would be designed to protect visual quality of the NCA.
238	Add the words "and streams" to the 300-foot camping restriction. DELETE the word "inside (the NCA)" from where it suggests encouraging developed campgrounds on private lands . That is fine OUTSIDE , but not inside the NCA . What , if any , developments would the Nat'l Desert Trail entail? Dune and hummock areas should be closed until science indicates that camping / OHV routes will not damage their natural values . The area of the playa relegated to class 4 events needs to be moved much farther south , just north of the NCA boundary . It is important that large-scale events remain in their current sites and not move north up the playa .	The NRS statute that would restrict camping within 300ft. of springs would be adopted as written (decision REC-2). Decision REC-18 restricts camping to designated sites in High Rock Canyon, in the LCT area, and within the dune and hummock areas, which would minimize impacts to riparian areas. Developed campgrounds would be encouraged only on private lands within the NCA, which would alleviate camping pressure on public lands within the NCA and promote economic growth in the gateway communities. (See decision REC-11) OHV travel would also be restricted to designated routes in the dune and

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
239	Many comments expressed concern over developed campgrounds in the NCA. The comments expressed concerns about the need for developed campgrounds, the level of development and impacts to the primitive character and visitor experience. Comments expressed both support and opposition to developed campgrounds on private lands inside or outside of the planning area.	hummock area. If monitoring indicates resource impacts, dune and hummock areas would be closed to camping (see decision REC-19). The establishment of the Desert Trail would not involve trail construction, it would be established as an orienteering trail, in which a point-to-point hiking corridor would be identified. Large scale permitted activities would be permitted in the area shown on Map 8-14. The revised language in decisions REC-25 and REC-27, clarifies the intention to concentrate large-scale permits to the southern portions of the playa and to maintain public access and opportunities for solitude at least one-half of the summer season (Memorial Day through Labor Day).
240	Comments supporting the routing of the Desert Trail were received, except for a few skeptics who questioned the level of development involved with the routing. Many of the same comments indicated support for designated sites in High Rock Canyon or opposition to year-long camping restrictions for non-motorized overnight use.	Visitor education, enforcement and other off-site tactics would be the first tactics taken to address resource concerns.
241	A multitude of comments were received in response to proposed decisions for Special Recreation Permits. Many of the comments were directly correlated to the proposed permit area for large-scale permitted activities. Several comments were adamantly opposed to authorizing large-scale permits at all, and many permit participants indicated their desire to continue managing the playa for large scale permitted activities. Many comment also raised concerns about impacts to other users (particularly in northern parts of the playa), sensitive hot springs sites, the condition of the playa surface, and impacts to local residents and communities among other things, that could result from the continuation of large-scale permitted activities.	Consideration was given to the National Desert Trail in the RMP. The trail would be routed through the NCA and wilderness. The use of designated sites would be encouraged, but only vehicular camping in High Rock Canyon would be required to use designated sites, unless monitoring indicates a need for additional restrictions. See decision REC-14, REC-18 and map 8-4.
242	Existing interpretive signing installed and maintained by Trails West has become part of the landscape and should be allowed to remain.	Large-scale permitted events were given specific mention in the legislation that created this NCA. Large scale permitted activities would be permitted in areas of the playa shown on Map 8-14. Minor modifications were made to reduce the northern extent of the permit area proposed in the preferred alternative of the Draft RMP. The language found in decisions REC-25 and REC-27 were adjusted based on public input to clarify the intent of concentrating large-scale permits to the southern portions of the Black Rock Desert playa, as well as maintaining access and opportunities for solitude.
	Existing interpretive signage installed and maintained by Trails West has become part of the landscape and should be allowed to remain.	Existing interpretive signage would remain. Self-guided tours, using methods such as those you suggested, would be used as an effort to reduce on site developments.

Appendix N: Comments and Responses

Recreation

Section 2: Comment Summaries and Responses

#	Comment	Response
243	Woody debris is an important habitat component for both aquatic and terrestrial species. We recommend that wood for campfires be imported and collection of firewood (including dead and down wood) be prohibited, especially in areas around sensitive species habitats.	Visitors would be encouraged to minimize the impacts of campfires and would be encouraged to use imported firewood only (See decisions REC-3 and REC-4). Supplemental rules developed through site specific plans will address collection limitations or restrictions in specific areas.
244	Comments supporting the routing of the Desert Trail were received, except for a few skeptics who questioned the level of development involved with the routing. Many of the same comments indicated support for designated sites in High Rock Canyon or opposition to year-long camping restrictions for non-motorized overnight use.	Consideration was given to the National Desert Trail in the RMP. The trail would be routed through the NCA and wilderness. The use of designated sites would be encouraged, but only vehicular camping in High Rock Canyon would be required to use designated sites, unless monitoring indicates a need for additional restrictions. See decision REC-14, REC-18 and map 8-4.
245	A multitude of comments were received in response to proposed decisions for Special Recreation Permits. Many of the comments were directly correlated to the proposed permit area for large-scale permitted activities. Several comments were adamantly opposed to authorizing large-scale permits at all, and many permit participants indicated their desire to continue managing the playa for large scale permitted activities. Many comment also raised concerns about impacts to other users (particularly in northern parts of the playa), sensitive hot springs sites, the condition of the playa surface, and impacts to local residents and communities among other things, that could result from the continuation of large-scale permitted activities.	Large-scale permitted events were given specific mention in the legislation that created this NCA. Large scale permitted activities would be permitted in areas of the playa shown on Map 8-14. Minor modifications were made to reduce the northern extent of the permit area proposed in the preferred alternative of the Draft RMP. The language found in decisions REC-25 and REC-27 were adjusted based on public input to clarify the intent of concentrating large-scale permits to the southern portions of the Black Rock Desert playa, as well as maintaining access and opportunities for solitude.
246	Page 2-37 2.7.18.5 Special Recreation Permits: We were unable to interpret the map (2-35) provided for this section. The keys were not clear and the areas seemed inconsistent with the maps for Visual Resources (2-31).	Large-scale permitted events were given specific mention in the legislation that created this NCA. Large scale permitted activities would be permitted in areas of the playa shown on Map 8-14. Minor modifications were made to reduce the northern extent of the permit area proposed in the preferred alternative of the Draft RMP. The language found in decisions REC-25 and REC-27 was adjusted based on public input to clarify the intent of concentrating large-scale permits to the southern portions of the Black Rock Desert playa, as well as maintaining access and opportunities for solitude.

Appendix N: Comments and Responses

Public Outreach and Visitor Services

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
247	New signs, new roads, road upgrades, on-site interpretation, visitor services, maps and informational brochures, and developed campgrounds do not fit in with the goal of maintaining the historic primitive outlook and generally do not belong within the NCA. Visitor services would be very appropriate in the gateway communities. In addition to such community visitor centers, the main road entrances to the NCA would be excellent places for modest kiosks (with parking areas) to display detailed maps.	<p>Management direction under the proposed RMP would focus on retaining the wild and undeveloped character of the planning area. Off-site methods of public outreach and interpretation/education would be emphasized, such as maps, driving guides, websites, self-guided tours, and informational exhibits located near the entry points of the NCA boundaries. The increased use of volunteers and BLM presence would also help to provide information in the absence of developed facilities. Facilities, signage, and road upgrades within the NCA would be kept to a minimum, and partnerships would be pursued to provide visitor services outside of the NCA boundaries. Activity level planning would determine the specific details of site development, interpretation or other visitor facilities. Road maintenance levels and directional signage would also be handled through the implementation of the transportation plan.</p> <p>When facilities are deemed necessary to protect resources or to provide opportunities for interpretation/education they would be limited to the Frontcountry zone, areas that currently have developed facilities, areas where monitoring indicates impacts to sensitive natural or cultural resources, where public safety concerns exist, where there is continual motorized trespass in wilderness, or where inadvertent damage related to uninformed visitor use occurs. All facilities would be designed to be unobtrusive and aesthetically compatible with the landscape. Developments would not occur in designated wilderness, unless a specific resource concern arises. Existing interpretive and directional signage would be maintained until the completion of a signing plan.</p> <p>Visitor education, enforcement and other off-site tactics would be the first tactics taken to address resource concerns.</p> <p>Private landowners within the NCA and private operators outside of the NCA would be encouraged to provide visitor services. Encouraging developments to occur on private lands is an attempt to draw visitation away from attraction areas on public lands. Since most private landholdings within the NCA are associated with ranching operations, including ranch houses and outbuildings, fences and other developments, impacts to the undeveloped nature and in these areas would be minimal.</p> <p>To allow continued overnight use of attraction areas on public lands,</p>

Appendix N: Comments and Responses

Public Outreach and Visitor Services

Section 2: Comment Summaries and Responses

#	Comment	Response
248	Administrative and Visitors Centers: The BLM should establish an administrative facility at Gerlach, to be staffed (seasonably at least) by BLM staff providing law enforcement and management in the area. The facility should be staffed on weekends of traditional heavy use in the area. Volunteers should be able to use the facility to provide informational and interpretative material to visitors during high use weekends throughout the summer season.	developed campgrounds could be used to concentrate use to suitable locations away from sensitive resources in the Frontcountry Zone. The frontcountry zone encompasses those areas where developed facilities currently exist, and areas receiving high levels of visitation. Therefore, impacts to the undeveloped nature and opportunities for solitude in these areas would be minimal. Campgrounds would be primitively developed; facilities would be used for resource protection more than visitor comfort. They would be designed to be visually unobtrusive and compatible with the surrounding environment. Visitor management of attraction areas within the Rustic Zone would be handled through the use of designated campsites. Rather than concentrating use, overnight use would be dispersed through the provision of limited designated campsites within the immediate vicinity of popular destinations (ie: Black Rock Springs, roaded portions of the LCT Area and Double Hot Springs). Camping would be restricted within one-half mile of these designated sites.
249	Include only minimal new onsite visitor interpretation, as put forth in Alternative A. The degree of new on-site interpretation and signs allowed in the Preferred Alternative would dramatically change the character of the area -- a fact given insufficient consideration in the RMP/EIS "impacts" section. Site specific proposals must comply with the mandates of NEPA.	See decision VIS-2 as revised in the proposed RMP. This decision includes the establishment of an administrative center/visitor contact station in Gerlach as well as multifunctional visitor centers in other gateway communities. Management direction under the proposed RMP would focus on retaining the wild and undeveloped character of the planning area. Off-site methods of public outreach and interpretation/education would be emphasized, such as maps, driving guides, websites, self-guided tours, and informational exhibits located near the entry points of the NCA boundaries. The increased use of volunteers and BLM presence would also help to provide information in the absence of developed facilities. Facilities, signage, and road upgrades within the NCA would be kept to a minimum, and partnerships would be pursued to provide visitor services outside of the NCA boundaries. Activity level planning would determine the specific details of site development, interpretation or other visitor facilities. Road maintenance levels and directional signage would also be handled through the implementation of the transportation plan. When facilities are deemed necessary to protect resources or to provide

Appendix N: Comments and Responses

Public Outreach and Visitor Services

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
		<p>opportunities for interpretation/education they would be limited to the Frontcountry zone, areas that currently have developed facilities, areas where monitoring indicates impacts to sensitive natural or cultural resources, where public safety concerns exist, where there is continual motorized trespass in wilderness, or where inadvertent damage related to uninformed visitor use occurs. All facilities would be designed to be unobtrusive and aesthetically compatible with the landscape. Developments would not occur in designated wilderness, unless a specific resource concern arises. Existing interpretive and directional signage would be maintained until the completion of a signing plan.</p>
251	<p>2.4.20 Public Outreach and Visitor Services. I strongly support the Objectives, especially Objective 4. This is where the State and Counties can have their economic development and tourism contact facilities. I strongly support use of staff on the ground to meet and talk with visitors when and where possible. Personal contact has a more powerful message than any kiosk, brochure or sign. Please include personal contact by staff to your list of potential types of information and formats.</p>	<p>Increased on-the-ground presence was added to the list of possible outreach methods shown in decision VIS-5 of the proposed RMP.</p>
253	<p>In this category, Trails West found neither Alternative A, B, nor C desirable in their entirety. Some type of permanent visitor center and administrative facility should be established at Gerlach, the primary entry to the NCA, that would provide administrative services and law enforcement for the NCA. It should be staffed at least during periods of heavy travel in the NCA and provide travel and interpretive information. Volunteers could be recruited to answer travel questions and hand out informational literature during periods of high use. In addition, an NCA web site should be created to provide, as a minimum, information on permitted events, travel and safety conditions, and any road/area closures to the NCA.</p>	<p>See decision VIS-2 as revised. This decision includes the establishment of an administrative center/visitor contact station in Gerlach as well as multifunctional visitor centers in other gateway communities.</p>
254	<p>Many comments requested clarification of how outreach and visitor services would be provided through the Internet. Several of these comments asked that the website provide calendar services, interpretive materials, and information on events in the planning area.</p>	<p>Our website would be one of the primary methods of disseminating information to the NCA visitors and area users. Details of outreach strategies would be developed in the Education/Outreach plan (see decision VIS-5).</p>
256	<p>Many comments expressed concern over developed campgrounds in the NCA. The comments expressed concerns about the need for developed campgrounds, the level of development and impacts to the primitive character and visitor experience. Comments expressed both support and opposition to developed campgrounds on private lands inside or outside of the planning area.</p>	<p>Visitor education, enforcement and other off-site tactics would be the first tactics taken to address resource concerns.</p> <p>Visitor education, enforcement and other off-site tactics would be the first tactics taken to address resource concerns.</p>

Appendix N: Comments and Responses

Public Outreach and Visitor Services

Section 2: Comment Summaries and Responses

#	<i>Comment</i>	<i>Response</i>
		<p>Private landowners within the NCA and private operators outside of the NCA would be encouraged to provide visitor services. (See Decision REC-11). Encouraging developments to occur on private lands is an attempt to draw visitation away from attraction areas on public lands. Since most private landholdings within the NCA are associated with ranching operations, including ranch houses and outbuildings, fences and other developments, impacts to the undeveloped nature and in these areas would be minimal.</p> <p>To allow continued overnight use of attraction areas on public lands, developed campgrounds could be used to concentrate use to suitable locations away from sensitive resources in the Frontcountry Zone (See decision REC-7). The frontcountry zone encompasses those areas where developed facilities currently exist, and areas receiving high levels of visitation. Therefore, impacts to the undeveloped nature and opportunities for solitude in these areas would be minimal. Campgrounds would be primitively developed; facilities would be used for resource protection more than visitor comfort. They would be designed to be visually unobtrusive and compatible with the surrounding environment (See decision REC-8). Visitor management of attraction areas within the Rustic Zone would be handled through the use of designated campsites (See decision REC-17 and REC-18). Rather than concentrating use, overnight use would be dispersed through the provision of limited designated campsites within the immediate vicinity of popular destinations (ie. Black Rock Springs, roaded portions of the LCT Area and Double Hot Springs). Camping would also be restricted within one-half mile of designated sites (See decision REC-16 and REC-19).</p>

Appendix N: Comments and Responses

Socioeconomics

Section 2: Comment Summaries and Responses

#	Comment	Response
257	The DEIS lacks an economic analysis of its impact on region users and adjacent property owners. We recommend that a economic analysis with user demographics be conducted prior to the final decision.	While there is insufficient data on user demographics to complete a detailed regional economic impact analysis, the analysis provided in Chapter 4 describes the economic impacts of major activities in the planning area. The economic analysis includes descriptions of potential impacts from increased visitation to county road maintenance, the change in regional revenue based on recreation use, search and rescue costs, and benefits to local communities. The impacts of providing a visitor contact station are also described. Section 3.19.4 describes the lack of economic impacts to the agricultural sector because grazing, the predominant agricultural activity in the planning area, was included in the NCA Act.
258	In Chapter 3- Social and Economic Conditions on page 3-68. Access to the NCA from Imlay should be added. The route from Imlay to Sulphur may be used by some visitors and provides access to certain key areas along the emigrant trail such as Rabbithole Springs. This route should be included as an access route.	Only the major gateway communities to the planning area are included in the locale and access section of Chapter 3. The access route from Imlay to the planning area is frequently used and will remain an access route to the planning area. The Proposed RMP does not preclude any access in the corridor from Imlay to Sulphur.
259	Vision and Goals: I agree with most goals but I find the goal to “allow for social and economic benefits” may not be compatible with the protection of the area. In no part of the legislation do I read about social and economic benefits. Are they inferred from providing visitor facilities?	Social and Economic benefits are derived through ongoing activities specifically mentioned in the Act including, but not limited to grazing, permitted events, and valid existing rights. The goals of the proposed RMP continue to support these benefits.

Appendix N: Comments and Responses

General Comment

Section 2: Comment Summaries and Responses

#	Comment	Response
260	<p>In 1986, the Nevada Statewide Policy Plan for Public Lands was approved by Governor Richard Bryan. The document contains broad guidance for the management and use of the public lands in Nevada and are an expression of the state's position on how public land managing agencies will plan and manage those public lands. Local governments also adopted public land management policies as part of the statewide plan, some of which have since been updated, and these local policies should also provide guidance for the Bureau of Land Management in developing the Black Rock NCA RMP. Pertinent goals established in the Statewide Policy Plan that should be applied in the planning effort are:</p> <p>Manage and utilize public lands on the basis of multiple use and sustained yield concepts, and in a manner that will conserve natural resources, protect and preserve the quality of the environmental, ecological, scenic, historical and archeological values; protect and preserve wildlife habitat and certain lands in their natural condition; and provide for long term benefits to the people of Nevada and future generations.</p> <p>Maintain and/or increase cooperation and coordination between local, state and federal agencies to facilitate the most effective and beneficial planning and management of Nevada's natural resources.</p> <p>Retain existing access to public lands and provide new means of access where necessary.</p> <p>Develop, conserve and protect scenic, historic and recreational resources for the benefit of present and future generations.</p> <p>Maintain and improve public access to recreational resources on public lands.</p> <p>Coordinate federal, state and local efforts to understand and protect the quality of the environment and natural ecosystems, considering also impacts on Nevada's communities and people.</p> <p>Conserve and protect the structures, objects, sites and trails of historic and prehistoric significance found on the public lands for the benefit of present and future generations.</p>	<p>The pertinent goals identified from the state and local public land management policies are consistent with BLM's mandate under FLPMA and direction set forth in the NCA Act. As outlined in Section 1.8, BLM is required by FLPMA to ensure consistency with other federal, state, and local agencies and tribal plans. Representatives from these agencies and tribes were included in the NCA RAC subgroup to participate in the collaborative planning process.</p>
261	<p>BLM's preferred alternative needs to ensure that visitors will be able to relive the emigrant experience of traveling through an unaltered, primitive, undisturbed area, as set forth by Congress. Please ensure the planning area stays primitive, wild and undeveloped for generations to enjoy. The current management proposal allows road upgrades, development of facilities that might threaten the natural habitat and spoil the wilderness character of the NCA. Management objectives should be comprehensive protection and enhancement of the Emigrant Trail.</p>	<p>The RMP focuses on preserving the natural state of the planning area while allowing for visitor opportunities. The balance given to these goals varies among the management alternatives, thereby establishing a reasonable range of alternatives consistent with NEPA regulation. Road upgrades and facility development under some alternatives were found to be important in achieving the goals set forth for the NCA and meeting the intent and spirit of the individual alternatives.</p>
263	<p>The Humboldt County Commission has reviewed the draft Resource Management Plan and Draft Environmental Impact Statement for the Black Rock Desert -High Rock</p>	<p>BLM recognizes the importance of communicating and working with local communities, jurisdictions, and other stakeholders. Management decisions</p>

Appendix N: Comments and Responses

General Comment

Section 2: Comment Summaries and Responses

#	Comment	Response
	<p>Canyon Emigrant Trails National Conservation Area (NCA) and Associated Wilderness, and other Contiguous Lands in Nevada. In this review we started with the preferred alternative and will only offer input on the areas where we feel change is needed. We approached the review from the standpoint of maximum flexibility in the management of the NCA. In doing this we have included the maximum access to the NCA, the maximum visitor benefit/ experience, and attempted to keep the safety of the public in mind.</p> <p>We would recommend that a committee, which includes representatives of the Humboldt, Pershing and Washoe County Commissions, be created to work with the BLM in the implementation of the plan. In addition we would request that scheduled reviews between the BLM and the County be scheduled to discuss what is working as expected, what is not, and what early solutions, probably at lower expense, are possible.</p>	<p>have been incorporated into the draft and final RMP/EIS to pursue agreements with counties regarding roads (decision TRAN-6) and forming an public involvement group to provide feedback to BLM through the Resource Advisory Councils (Chapter 7).</p>
264	<p>Manage the NCA for conservation, protection and enhancement of the emigrant trail and surrounding area, not as a Special Recreation Management Area.</p>	<p>The definition of SMRA has been changed in the glossary to reflect that recreation would not overshadow the need to protect the emigrant trails and their setting for future generations.</p>
265	<p>As a program level document, the broad direction of the BLM is clear. We will need site specific information, however, to fulfill Endangered Species Act (ESA), section 7 consultation requirements. This site specific information will allow us to fully address the potential effects to listed species, including Lahontan cutthroat trout, desert dace, and basalt cinquefoil. To achieve this we recommend conducting a programmatic consultation, followed by project specific consultations as the RMP is implemented. This approach is consistent with the RMP planning process adopted by the BLM.</p>	<p>BLM consultation with the Fish and Wildlife Service throughout the RMP/EIS process was at the programmatic level. BLM will continue to fulfill requirements under section 7 through activity level planning that is part of the implementation of the RMP. The future coordination and consultation with the FWS will be site-specific.</p>
266	<p>Several management plans are expected to be developed and implemented (i.e., wilderness, vegetation and noxious weeds, recreation, water quality objectives, Soldier Meadows Activity Plan (SMAP). In addition, a variety of inventory and monitoring protocols (i.e., for cultural resources, recreation, sage grouse, basalt cinquefoil) must to be developed and implemented in order to meet the goals of the RMP. We recommend the BLM establish a time line for the development and implementation of these critical elements of the RMP. We also recommend that regardless of the alternative selected, or components thereof, a recreation plan should be developed to allow for sensitive species management.</p>	<p>BLM agrees with these recommendations. Activity level plans will be prioritized and timelines established following the adoption of an RMP. Sensitive species plans as well as a recreation plan identified in the RMP will be developed at that time as well.</p>

Appendix N: Comments and Responses

Other

Section 2: Comment Summaries and Responses

#	Comment	Response
267	Tillage fragments and completely alters sagebrush habitat to the detriment of sagebrush birds. However, even remnant sagebrush patches have value to some species. Certain practices can be adopted to reduce farming's impacts on birds. Minimum till and no-till systems maintain vegetative cover through the non-breeding season and provide habitat for small mammals and wintering songbirds. This in turn benefits raptors. The burrowing owl and short-eared owl, and to a lesser extent the ferruginous hawk and prairie falcon, all use agricultural areas during winter for foraging (Young 1987). Sites with unsuitable soils or slopes too steep for farming should be kept in native vegetation as "habitat stepping stones."	Farming within the planning area only occurs on private lands; therefore, BLM does not have control over farming practices implemented. Tilling practices to create fire lines, fencing, and other activities which may potentially affect migratory birds will be conducted in accordance with Executive Order 13686.
268	Impacts of military activities or over flights on public lands must be fully assessed In this land use plan process, and the impacts use of flares causing fires, noise or low level flights interfering with recreational uses, any on-the-ground maneuvers, etc. must be fully addressed. Are any military activities currently occurring in Black Rock lands, or airspace?	Military activities are not occurring on the ground in the NCA or wilderness areas. BLM has no jurisdiction in the management of airspace.
269	The concept of adaptive management needs to be better defined and additional information supplied on how adaptive management would be implemented in the planning area.	Chapter 9 includes information on the use of the adaptive management process in the implementation and evaluation of the RMP.
270	The RMP should provide for and propose what will be necessary to do an adequate job of protecting the area as intended by Congress. Designation of the area as a National Conservation Area because of special attributes found there will result in attracting those that would not have otherwise known of the area to visit.	The first analytical assumption in Section 4.1.1 states that funding will be available to implement any of the alternatives described in Chapter 2. All decisions in the proposed RMP were developed under this assumption and BLM will pursue funding to implement decisions found in the plan in order to achieve plan objectives.
271	The page headings for Alternative C on pages 2-39 through 2-46 are labeled "Chapter 2 Alternatives Considered But Not Included". This labeling should not begin until page 247, since Alternative C is being addressed on those pages.	This was a typographical error contained in the Draft. It has been corrected in the Proposed RMP and Final EIS.
272	The NCA was created over the objections of the local governments having jurisdiction over the area included. The BLM should work closely with these local governments to address their concerns about management and access needs to the NCA from their local areas. Since these local areas are likely to share in some of the visitor impacts, whatever economic benefits which may be derived for the rural areas should be sought. Installing information centers in or near the locations cited above would promote visitors stopping in these communities for various supplies and services.	BLM recognizes the importance of communicating and working with local communities, jurisdictions, and other stakeholders. Management decisions have been incorporated into the draft and proposed RMP to pursue agreements with counties regarding roads (decision TRAN-6) and forming an implementation committee to provide feedback to BLM (Chapter 9). Decision VIS-2 was revised in the proposed RMP to include the establishment of an administrative center in Gerlach as well as multifunctional visitor centers other gateway communities.

Appendix N: Comments and Responses

Other

Section 2: Comment Summaries and Responses

#	Comment	Response
273	The RMP Implementation should include the continuing use of a group of agencies, Tribes and other stakeholders. The successful involvement of the RAC subgroup demonstrates the usefulness of such a group.	Chapter 7 (Section 7.4) provides for the formation of a public involvement group that would continue to advise the two RACs during RMP implementation.
274	Many of the actions proposed in the various alternatives lack adequate enforcement. As an example, simply identifying OHV use areas that are limited to certain existing designated roads will not prevent misuse from occurring. All proposals intended to protect natural and cultural resources must be monitored and all restrictions of use must be enforced. Adequate personnel to accomplish this must be assigned to the NCA, at least seasonally.	The BLM has hired two new Law Enforcement Rangers (one in Cedarville and one in Winnemucca), and a backcountry ranger to increase our presence in the NCA and monitor use in the NCA.
275	Zones are being used to accept greater degradation of resources in one area than another. The legislation does not suggest such a thing; the objectives of the NCA are best met by affording equal protection to resources in all areas of the NCA. There is no reason to accept anything less than the greatest protection for resources in all parts of the NCA. Large recreational events, which will continue on the playa as indicated by the legislation, can be controlled to minimize damage to resources. Do not divide the area by zones. Be consistent in the area's management, for equal conservation, protection, and enhancement of all values and resources throughout the whole of the area as required by the legislation. Do not use zones. I support the zoning boundaries identified in Alternative A of the draft, with the Front Country zone additionally limited on the north by the Pershing/Humboldt County line. (Better: The boundary should be drawn south of the Pershing/Humboldt County line, about as far north as Flowing Wells, and excluding the Quinn River sink.) The management objectives for the Rustic Zone (listed in Appendix B of the Draft) should be changed. The management objectives for the Front Country Zone should be changed.	Zoning is a management tool for use by the managing agency, which is not intended to change the visitor experience or the resource condition. They are used to help maintain the diversity of resources and related experiences that currently exist. Zones describe the character of visitor facilities, activities, etc., which are permitted within them, and are based on existing conditions or desired resource conditions. The management zone boundaries have been adjusted based on public input. Please see Decision REC-15, Map 8-13, and zone descriptions, found in Appendix B of this Plan.

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Agencies

United States Environmental Protection Agency, Region IX
Nevada State Clearinghouse
Nevada State Historic Preservation Officer (SHPO)
Nevada Department of Wildlife (NDOW)
Nevada Division of State Parks
Department of Agriculture
Nevada Board of Wildlife Commissioners
Humboldt County Commission
Nevada Division of State Lands
United States Fish and Wildlife Service - Nevada Office

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Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

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Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

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Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

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Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

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Klis Guckenburg	Kelly Hanlon	Chris Hehman	Bob Hill	Jane Hooten	Janine Ireland
Karen Guffy	Kathleen Hanna	Lorraine Heidecker	Andrea Hiller	Triska Hoover	Elizabeth Irons
Bill Guheen	Michael Hannan	Shelly Heigert	Briana Hiller-Hannan	Sheila Hopkins	Nick Irvine
Lilace Guignard	Sonja Hannon	Kim Heilig	Carole Hillwig	David Horneck	Shawna Isaacson
Liz Guilfoy	Adam Hannuksela	John Heinlein	Meleah Hember	Elizabeth Horvath	Kim Isban
Marge Guimbellot	Timothy Hanold	Dan Heinz	Glenn Himebaugh	John Hotchkiss	Susanna Isbell
Jane Gump	Christine Hansen	Gary Heitz	Lisa Hines	Janet Houle	Regina Itskova
Janine Gunderman	Kristin Hanson	Betty Heller	Peter Hinson	Patricia House	Javan Ivey
Joan Gunderson	Cynthia Harbert	Janne Hellgren	Deborah Hirsch	Toni Howard	Sharon Jabs
Angela Gunn	George and Frances Harbin	V Hemingway	Ethan Hirsch-Tauber	Barbara Howard-Liberti	Trisha Jachlewski
Daniel Gunnarson	Anuj Gupta	Ethan Hemming	Diane Hise	Donna Howarth	Erlene Jackson
Gwendolyn Gurley	Andrea Hardiman	Jane Henderson	Mary Hitchcock	Tom Howell	Ann Jacobs
Howard Gutknecht	Steve Harding	Dennis Hendren	Janet Hitt	David Howenstein	Paul Jacobsen
Marie Gutkowski	Debra Harding-Vanaman	Sandra Hendricks	Ruth Hixon	Lindsay Hoyt, Jr.	Lois Jacobson
Ernest Guzman	Peggy Hardman	Troy Hendrickson	Yary Hluchan	Teresa Hsieh	Fred Jakobic
Kristen Gwara	Terry Hardwicke	Brandi Henley	Maryjane Hoadley	Alice Huang	Matthew Jalbert
Deborah Haber	Ann Hardy	Christopher Hennes	Thomas Hoaglund	Margaret Hubbert	Candice James
Carol Habre	Oskar Harjes	Veronica Henning	Cara Hochhalter	Dorothy Hudig	Mike Jameson
Alison Hager	Amy Harlib	Ellen Henrici	Patrick Hodge	Georg & Gesa Hueckel	Ross Janes
Bridgette Hagerty	Gail Harmon	Russell Henry	Tash Hodges	Terry Huey	Cheryl Janicki
Talbott Hagood	Hudlene K Harney	Alan Hensley	Carson Hoffman	Amie Huffman	Andrew Janjigian
Candy Hagy	Robert Harper	Teresa Henson	Paul Hofheins	Angie Hughes	Monika Jansen
Karl R. Hahn	Peter Harrell	Gail Herath-Veiby	Brian Hogan	Judie Hulett	Robert Janusko
Jenna Hains	Alice Harriman	Ed Herb	Susan Hogarth	Carla Hull	Jendra Jarnagin
Jim Hajek	Collin Harris	Kris Herbst	Pete Hogg	Steve Hummel	Samantha Jarnot
Carol Halberstadt	Dana Harrison	Susan Hericks	Chris Hogger	Chris Hundhausen	Douglas Jaslow
Biswanath Halder	Raymond Hart	Mark Herman	Ron Holberg	George Hunt	Ralph Jaszowski
Leann Hale	Diana Hartley	Rick Hermann	Joshua Holden	Jennifer Hunter	Paula Jayne
James Hall	Kathleen Hartman	Steve Hermsillo	Robert Holder	Ophea Huntsman	Lawrence Jeffery
Mary Halligan	Marcia Harvey	Laura Herndon	Renee Holesovsky	Rose Hurst	Jim Jeffress
Neal Halloran	Thomas Hasek	C Herold	Erin Holland	Deborah N. Hurwitz	Lynne Jeffries
Marsha Hall-Prieto	Kenneth Hasenfus	Jan Herrell	Phil Hollenbeck	Heather Huse	Alexander Jelinek
Robert Halpin	Marjorie Hass	Ken Herren	Mary Holleran	Yuri Huta	Katherine Jenkins-Murphy
Mark Halvorsen	Jeff Hatcher	Diane Hert	Lauris Hollis	Terrance Hutchinson	Alan Jenks
Annette Halvorson	Frank Hauke	Carla Herwitz	David Hollon	Wilma Hutchison	Patricia J. Jennings
Sarah Hambrick	Elissa Hauptman	Linda Hes	Laurel Holloway	Doris Hutton	Tel Jensen
Lisa Hamilton	Barbara Hawkins	Judy Heumann	Melisa Holman	Anisha Hyers	Lottie Jenvey
Debi Hamlin	Harold Hayes	Eric Hevenor	Even Holmboe	Scott Ibbs	Suzanne Jerabeck
Miss Maryjane Hammel	Walter Hayley	Rick Hiatt	Eamon Holmes	Angela Ichigui	Jan Jewell
Karen Hammer	Susan Haymore	Rebecca Hibbs	Ed Holowinko	Melissa Ide	Paul Jhona
Andrew Hammersley	Stephanie Hazlett	David Hicks	Janet Holsomback	V Ielmorini	Pamela Jiranek
Kristen Hampton	Jim Head	Andrew Hieb	Carl Holton	Robert & Virginia Iardi	Tanya Jisa
Lillian Hanahan	Pat Headley	Mark Higbie	Sharon Hone	Melinda Illingworth	Ms. Wynn Johanson
Paula Hance	Michael Heald	Caitlin Higgins	Albert Honican	Karen Ingerman	Bill Johansson
Steven Handwerker		James R. Higgs	Lisa Hood	Jack Ingersoll	Meghan Johnsen

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Leigh Johnson	Ali Kendrick	Diane Kolakoski	Linda-Lou La Voy	Thomas Lawless	Greg Liburd
Susan Johnston	Bill Kennedy	Ellen Kolasky	Bill Laben	Brian Lawrence	Allison Licalsi
Nancy Johnstone	Meredith Kenney	Kurt Komraus	Jonathan Labozzetta	Larry Lawton	Edgar Lickey
Amy Jo Jolly-Van	Ann Kerchner	Susan Koop	Dale Lacognata	Betty Ann Lay	Evelyn Lickfeld Hayes
Bodegraven	David Kerlick	Mark Koplik	Juan Laden	Andrew Lazzarini	Allen Lieb
Marianne Jones	Donald Kern	Helen Kopp	Gary Ladner	Sylvia & Don, &	Debra Lieberman
Lauren Jonik	Deborah Kerr	Mary Korde	Jared Lafave	Daughter, Emily Leach	Fritz Lieberhardt
Lawrence Jordan	John Kesich	Ann Korman	Brian Lafferty	Noreen Leahey	Laura Liebman
James H Jorgensen	Laura Ketchum	June Koster	Michele Lafontaine	Nanette Leaman	David Lien
Debra Joseph	Omar Khalid	Constance Kosuda	Dawn Lafrance	Autumn Lear	David Liewehr
Judy Joslin	Gurudaya Khalsa	Dimitri Kourouniotis	Emily Lain	Patricia Lebaron	Nancy Lill
Joe Jowdy	Hilda Kidwell	Jenni Kovich	Cate Laine	Janet Leblanc	Mao Teng Lin
Lucy Joyce	Steve Kiene	Monica Koziol	Michael Laird	Linda Z Leblang	Michael L. Lindberg
Marjorie Joyner	Terry Kilcrease	Summer Kozisek	Mark Laitysnyder	Matthew Lebrato	Darren Linder
G. Russell Juelt	Sharon Killay	Marilyn Kramer	Mark Lakata	Haidee Leclair	Amy Lindsey
Halina Just	Jeanette Kille	Claude Krampe	Mark Lakes	Bernadette Lee	James A Linebaugh
Linda Kadas	Kathy Kilmer	Emmanuel Krasner	Chris Lakin	Kathleen Leenerts	Thomas Linell
Darren Kaiser	Steve Kimball	Cheryl Krauss	Ivonne Lamazares	Susan Lefler	Robert Lingo
Avvaiyar Kamari	Charles Kimble	Anthony Krawczyk	Patricia Lambert	Rachel Leibowicz	Vincent Link
Karen Kamm	Valerie Kindschy	Ed Kraynak	Richard Lamke	Ron Leiken	Patricia Linley
Deborah Kamradt	Emerson Kindy	Fred Krebs	Emily Jane	Jack Leishman	Christine Linnemeier
Colleen Kane	Patricia King	Val Krehbiel	Lamontagne	Frederic Leist	Donald Lintner
Barbara Karcher	Douglas Kinney	Liz Kreml	David & Betsy Lamp	Cayce Leithauser	Mikey Linville
Robert Karges	Scott Kirby	Dale Krewson	Samantha Lampert	J. Lellinger	Donna Liolis
David Karowe	Kathy Kirkland	Ken Krieger	Harold Lampkin	Mary Lemay	Edward Liona
Don Kass	Selena Kiser	Terri Kriegsfeld	Seth Land	Michael Lemieux	Ero Lippold
Elaine Kassel	Greg Kiskaden	Kristopher Kriner	Hazel Landa	Michelle Lemon	Tamara Lischka
Terese Katz	Irene Kitzman Md	Cory Kringlen	Ted Landry	Doug Lenier	Richard List
Steve Kaub	Eugene Kiver	Nidhi Krishen	Earl Lane	Maria Lent	Beth Liston
Sue Kaufman	William Klassen	Corbett Kroehler	Robert Laney	Barry Lentz	Joseph Lite
Katherine Kautz	Don Kleinhenz	Robert Krone	Miki Lang	Stacy Leon	Todd Littell
Jennie Kay	Angela Kleis	Steve Kronen	Eileen Lange	Richard Leonard	Amanda Little
Emma Kaye	Vanessa Klimek	Sara Kube	Tom Langley	Rachel Lepine	Tina Littleman
Jennifer Keating	Kym Kline	William Kuehnling	Don Langstaff	Joan Leppla	Karen Liuzzo
Sarah Keatts	George Kloszewski	Roger Kuhlman	Donna Langston	Kenny Lerner	George Livesay
Robert Keck	Thomas Klotz	Rick Kuhn	Bridget Lanoir	Jeanne Leske	Connie Livingston-
Nina Keefer	Charles Klyn	Richard Kump	Jerry Lansdowne	Robert Lesko	Dunn
Carole Keene	Andrew Kmetz	John Kunkel	Marcus Lanskey	Dawn Lesley	E Lloyd
Harolyn Keeney	Leah Knapp	Lisa Kunsch	James Lapean, Sr.	Sherry Letavis	Bruce Loeb
Joy Keeping	Sherry Knoppers	Bradley Kuntz	Rene Laplante	Michael Letendre	Peter Loeff
William Keeting	Margaret E. Knowlton	Michael Kupferberg	Thalia Large	Rafi Levavy	Nicole Loerzel
Linda Keeton	David and Betty	John Kurti	Brian Larson	Edward Levieux	Corina Logan
Robert Keiser	Knutzen	Anne Kurtzman	John Lashier	Robert Levin	Dale & Reva Logsdan
Debby Keller	Shane Koch	Aurora Kushner	James Latchney	Misty Levis	M.E Lohmeyer
Geoff Kelley	Richard Kociban	Ferdinand Kutheis	Chip Latham	Shai Levit	Krista Lohr
Lori Kelly	Lisa Koehl	Peter Kutra	Dina Lauman	John Lewis	Janine Loiselle-
Craig Kelso	Douglas Koenig	H. David Kwinter	Bridget Laurent	Ingrid Leyboldt	Newbern
David Kemmerer	William Koenig	Angela Kyser	Courtney Laves-	Matthew Libbey	Mary Jane Lombardo
Nathan Kempfer	Jake Koenigsberg	Doug La Follette	Mearini	Carol Liberatore	Kay Long
Scott Kender	Keith Kohnke	Peggy B La Point	Jacqueline Lavigna	Karl Libert	Carol Lonsdale

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Henry Lopez	Linda J. Mack	Larry Marson	Ed Mcdade	Warren Mehl	Don Minnerly
Paul Lopinski	Glen B Mackenzie	Karen L. Martellaro	Erica Mcdaniel	Glen Mehn	Amanda Minnix
Steven Loria	Patricia Mackura	Paul Martin	Ann Mcdermott	Jacqueline Meier	Shannon Minor
V Loring	Jill Maclaren	Henry Martini	Martine Mcdonagh	Chris Meilstrup	Dawn Misawic
Nichole Lorusso	Eleanor Maclellan	Anne Mascaro	Colin Mcdonald	Ron Meiners	Elizabeth Mitchell
Merry Loscalzo-Stumpf	Geoff Macnaughton	Michael Maslanek	Briana Mcelfish	Lillian J. Meissler-	Joe Mitchoff
Carla Lott	Diann Macrae	John Mason	Kathy Mcelwain	Deslandes	Lori Moak-Kean
Jonathan Lotz	Cher Madden	Bisanne Masoud	James Mcevoy	Arthur Meister	Anthony Modafferi
Charlotte Louis	David Ljung Madison	Kevin Mass	Terri Mcfarland	Rory Mellinger	David Modarelli
Cypress Lounge	Jan Madkins	Robert Massaro	Sheila Mcfather	Edward Mello	Lance Modlspacher
Kimball Love	Jessa Madosky	Eric Matheny	Elva Mcghee	Marion Melody	York Moehlenkamp
Nancy S. Lovejoy	Daniela Maestro	Jennifer Mathews	Paul Mcgill	Robin Melrose	Catherine Moffitt
Michael Loveless	P Magnuson	Michael Matiassek	Kathleen Mcginnis	Rachel Meltzer	Phillip Mohorich
Kimberly Lowe	Anthony Maguire	Dawn Matson	Colleen Mcdglone	Valorie Mendelson	David Moldal
Pam Lowrance	Rohit Mahajan	Steve Mattan	Wendy Mcdglathlin	Michelle Mercer	Helen Moller
Rosalinda Lozano	Cory Mahan	Felicia Matto-Shepard	Glenn Mcdgrew Iii	George A Merkel Iii	Todd Monaghan
Brian Lu	Robert S. Mahoney	Julie Mattson	Thomas Mcdquire	Jennifer Merrick	Heather Monasky
Deborah Lubar	Maia Maia	Jim Maurer	Mac Mcdintosh	Hilary Merrill	Alison Monk
Nicholas Lubofsky	Alexa Majors	A. May	Don Mcdivor	Dale Merriman	Daniel Monnig
Diane Lucas	Lorri Makela	Zaira Mayen	Mike Mckay	Jim Mertens	Hannah Monsimer
Phil Luccock	Brian Malechuk	Mindy Mayers	Kurt Mckenzie	Barbara Mertig	Oscar Adrian Montes
Noelle Lucenti	William Maley	Ardath Mayhar	Renae Mckeon	Kim Merville	Iga
Cathy Luchetti	Joel Malkerson	Hildy Maze	Gail Mckinley	Corinne Merwarth	David Moodie
Gary Ludi	Sonja Malmuth	Raphael Mazor	Peter J. Mckinney	Kevin Metz	Mark Moody
Jim Ludwig	Bill Malone	Mariah Mazur	Candy Mckinzie	Mark Metzger	Shannon Moore
Benjamin Luedke	Paul & Traci Maloney	Jeanette J. Mcdadoo	Beverly Mclaughlin	Debra Meyer	Marjorie Morace
Paul Luehrmann	Michael Malott	Tim Mcdavoy	Carole Mclendon	Jill Meyerhofer	James Moran
Keth Luke	Nicole Malyj	Sarah Mccaleb	Gail Mcmahon	Joseph Meyers	Madeline Moreaux
Pepper Lumina	Ted Manahan	Wm. Mccall	Mary Mcmann	Scott Michael	Lisa Morehead
Mark Lundgren	F. Manas	Kristi Mccann	Mimi Mcmillen	Coky Michel	Phyl Morello
Krista Luoto	Bonnie Mandell-Rice	Hunter Mccardle	Daniel Mcmiller	Sharon Midcap	Christine Moreno
Mayra Luria	Sandra Mandeville	Camille Mccarthy	Ann Mcdmullen	Corinne Middendorf	Kathy Morey
Richard Luther	Thomas Manes	Chris Mccarty	Patrick Mcdmurray	Stephen Mihm	David and Shannon
Richard Lutz	Laura Manges	Matthew Mccloskey	Robert Mcnally	Amanda Mikalson	Morgan
David Luxem	Ramona Manheim	Wolfe	Kapila Mcnary	Sally Mikkelsen	Simone Morgen
Patrice Lyke	Steven Mann	Gary Mccoin	Shirley A Mcneal	Carlos Milan	Kelly A Moritz
Joe Lynch	Susan Marchant	Malcolm Mccollum	Suzanne Mcdpherson	Lisa Milatovich	Dennis Morley
Andy Lynn	John Marchese	Lavonne Mccombie	Michael Mcdqueary	Marilyn Milbrandt	Jeanne Morlon
Beth Lyons	Kelly Marcu	Micah Mcdconochie	Lyle Mcdrae	Eric Miller	Gian Andrea Morresi
Bonnie Lytle	David Maret	Keren Mccord	R. Boyd Mcdsparran	Sharon Millerman	Peter Morris
Symone Ma	Gary Margolis	Doug Mccorkle	Elizabeth Mcdtaggart	Susan Milliner	Donald Morrison
Claude Maberry	Steven Marjeh	Laura Mccormack	Robert Mcdwhorter	Susan Mills	Kay Morrissey
Shawn Macdonald	Naomi Mark	Sheila Mccormick	Karen Meacham	Bryan Milne	Trey Morton
Mike Macdougall	Jonathan Markowitz	Brent Mccracken	Roy Mead	Jennifer Milton	Dottie Moseley
Jane Macek	Donna Marks	Jennifer Mccreary	Karen Meadow	John H Milton, Iii	Kim-Nora Moses
Michael Macelhiney	Leslie Marlow	Gary Mccuin	Lynn Meadows	Rachel Mimis	Mikasa Moss
Bruce K. Macfarlane	Susan Marrant	Marie Mccullough	Heather Mecham	Matthew Mims	Henry Most
Kurtis Macferrin	Dorothy Marsden	Bonnie Mcd Cune	Melissa Meece	Kevin Mineer	Elizabeth Motter
Milisen Machle	Bruce Marsh	Darci Mccurdy	Meriel Meehan	Brian Miner	Todd Mower
Marcia Machtiger	Gerald Marshall	Mike Mccurry	Peggy Megivern	Lynn Minneman	Melissa Moyer

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Nancy Moynihan	Riffraff Neredowell	Robert E Oleachea	Gwendolyn	David and Maren	Erik Poulson
Debbie Mrozinski	Ruth Nesbitt	Jan Oleson	Paruszkiewicz	Petersondegroff	Robert Pousman, Do
Joan Mueller	Henry Nesmith	Julie Olexa	Angela Paschall	Thomas Petrovich	William Powell 2ND
Cathy Muha	Steven Nesselroth	David K Oline	Frances/Summer Patch	Todd Petrowski	Molly Powers
Chris Muhlenfeld	Sharon Netherton	Frank Olsen	Shawn Patel	Deborah Pezzutti	Claudia Prather
Juliana Mujica	June Neubert	Kevin Olson	Jim and Pat Patera	Deborah Pflanz	Carly Pratt
Mary Alice Mulford	William Neuman	Janelle Olvey	Todd Patrick	Tracy Pheneger	Helga Preinesberger
Carol Mulhall	Jennifer Newberry	Joy Om	Susan Patrie	Trent Philipp	Pattie Ray Prentice
Robert Mull	John Newell	Elizabeth O'Nan	Paige Patterson	Elselil Philipps	Roland A. Press
Andrea Mullen	Jill & Richard	T Ondracek	Alan Paul	Christine Phillips	Charles Preston
Glorian Mulligan	Newhouse	Terry O'Neal	Dr. Paula K. Ivey	Alesandra Phillips-Shur	John Preudhomme
Carolyn Mullin	Tonya Newton	Annamarie O'Neil	Ernest Paviour	Dale Phurrough	Adam Prewett
Veneita Mullins	Angela Nichols	Yvonne O'Neill	Bekka Payack	Mary Phythian	Steph Price
Kim Mummert	Leslie Nicholson	Imperiale	Stephanie Payette	Sara Pic	Lisa Printz
Alison Munday	Marguerite Nicholson-	Beth Opazo	Karen Payne	Melanie Picciotti	Amy Prisco
Jacob Munoz	Schenk	Jo Oppenheimer	Alison Pearse	Celeste Picco	Lynn Proenza
Richard Munyon	Oliver Nickels	Marcos Orozco	Nick Pearson	Elizabeth Piechuta	Maria Prokopowycz
Martha Murchison	Deborah Nicol	John Orr	Terilee Peavler	Teri Pieper	Ted Proske
Ann Murphy	Carmen Nidkerson	Larry Orzechowski	Kristin Peckman	Jennifer Piercy	Linda Prostko
Lorraine Murray	William Niedringhaus	Bea Osapai	John Pedersen	Kat Pierquet	Guy Prouty
Jill Muse	Andreas Niesen	Mike O'Shea	Shannon Pedlar	Dolores Pietrzak	James Provence
Bob Mustacich	James Nimmo	Amie Osowski	Sheila Peebles	Russell Pillsbury	Jeffrey Prowell
Jim Myers	Gloria Nissenson	Frederick J Osterhagen	Linda Peer	Candace Pinaud	Joann Pruden
David Myes	Jan Nissl	Marie Ostrander	Rick Peerboom	Dolores C. Pino, Esq.	Susan Puder
J N	Paz Nkisi	Brenda Ostreicher	Carleen Peitzmeyer	Sheryl Pipe	Nicholas Pugliese
Lynette Naar	William Nobles	Kristin Otto	Terry Pelech	Derrell Piper	Elizabeth Purvis
Ryah Nabielski	Mary Jane Nolan	Leo Ouellette	Ellie Pelican	Natasha Piry	Eileen Putman
Laszlo Nadasdi	Victor None	Zbyslaw Owczarczyk	David Pell	Lisa Pisanic	Ed Pyle
Beverly Nadelman	Joseph Nonemaker	Jessica Owens	Claudette Pelsor	Danielle Piscatelli	Naomi Quenk
Susannah Naglee	Janice Norberg	Alan Ozer	Janet Pence	Jennifer Pitt	Jill Quick
Jacqueline Nagy	James M Nordlund	Jacquelyn P	Marie Pendzich	Susan Pitts	Julie Quick-Alcorn
Greg Nakamoto	Merle Norman	Peggy Paberzs	Carolyn Pennington	Marshall Pixley	Jill Quilici
Christie Nanawa	Ethan Norris	Roger Packard	Deanna Penwell	Theresa Pizzuto	Ew Quimbaya-Winship
Bj Narog	Melissa Notar	Lauren Padawer	Renee Pepin	Scott Plantier	Jeanne Quinn
Jeff Nash	Sharon Novak	Deborah Padgett	Jeanne Peppard	Kimberly Plastina	Noa R
Lisa Nativi	Louis Novellino	Kathleen Page	Sarah Pepper	Barry Plato	Rebecca Rabinowitz
Barbara Navarro	Bruce Nowak	Victor Paglia	Susan Pepperwood	Josie Platt	Ed Rachles
W. Jason Naylor	Suzanne Null	Aleta Pahl	Sheila Pereira	Richard Plude	Skip Radau
Tess Naymick-Forman	Sheila Nunn	Mike Painter	Theresa Perenich	Carrie Plummer	Shawn Radcliffe
Daniel Nazarenko	Charmaine Oakley	Terry Palin	Luiz Perez	Ted Pollard	Doug Rader
Tom Nead	Kevin O'Brien	Alicia Palmer	Sid Perkiins	Lance Polya, Ph.D.	Harold Radtke
N.T. Nealley	Todd O'Buckley	Nicholas Panella	Frances Perlman	Mary Pope	Judy Raetz
Ashley Neece	Satu O'Connell	Janine Panna	Matthew Perry	Carlo Popolizio	Dorli T Rainey
Meredith Needham	Carroll Oden	Ed Park	Jean Perry-Jones	Michael Poreda	Barbara Raisbeck
Larry A Neel	Celeste Oehl	Kathryn Parke	Rita Persichetty	Alison Portello	Annie Ralph
Grace Neff	Gloria Oehlman	Cindy Parker	Anita Pesec	Stuart Porteous	Karthik Raman
H.E. Neilson	Kari Oeltjen	Jean Parkinson	Lydia Peter	David Porter	Michelle Ramauro
Eileen Nelson	Jessica Oggenfuss	Niko Parlapiano	Cara Peters	Diane Porterfield	Jacquelyn Ramirez
Sarah Nelson-	Nanette Oggiono	Stacey Parris	Jeff Petersen	Kay Posey	Marguerite Ramlow
Steinberg	Susie Oh	James Parrott	Erik Peterson	Tecca D. Potina	Mary Ramos

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Tobin Ramsay	Jen Rhein	Cheryl Rosenfeld	Ron Sandvik	Michael Schmotzer	Fhatima Shands
Jenn Ramsey	Louis Rhodes	Merryl Rosenthal	Paul & Kathryn Sanko	Chris Schneider	Faron Shanklin
Cara Rancourt	Billy Rhyne	Liz Ross	Judyth Sant and	Fenster	Gerrie Shapiro
D. A. Randall	Mike Rice	Mary Ann Rossi	Family	Karen Schnurstein	Chris Shaver
Cheryl Rankin	Chuck Ricevuto	E.A. Rothman	Sonia Santana	Gordon Schochet	Joel Shaw
Rita L Ransom	Kim Rich	Lori & Richard	Roger Santerre	Erika Schoen	Robert Shearer
Robert Rapice	Ron Richards	Rothstein	Marie Santiago	Murry Schoenberger	Jane Sheldon
Harold Rapp	Don Richardson	Shelley Rothwell	Gina Santonas	Jackie Schofield	Charles Shelton
Ari Rapport	Kay Richey	Ann Rouhselange	Deborah & Joe	Stephen Scholand	Frederick Shenkman
\$Teven Raspa	Rae Richman	Bill Roullier	Santone	Marianne Scholer	Hope Sheppard
Raymond & Phyllis	Kelli Riddle	Sarah Rouse	Saskia Santos	Ken Schoolmeester	Linda Sherk
Ratte	Chris Ridenhour	Patricia Ann Roush	Desiree Saporito	Judy Schorler	John Sherman
Mark Rausher	Alan L Rider	Karline Rousseau	Ariana Saraha	Richard Schramm	Margaret Shermock
Jackie Raven	Harold Riegle	Dwight Rousu	Robert Sargent	Patricia Schreiner	Tanya Shersnow
Gigi Ray	Laura Riel	Jeff Routson	Val Sarver	Renee Schrock	Melanie Sherwinski
Pamela Raya-Carlton	Ie Ries	Patricia Rowe	Vincent Saulino	Steve Schroeder	Mark Shimshak
Tristan Raymond	Paul Riley	Stephen Royer	Julia Saunders	Rose and Mike Schulte	Benjamin Shipley
Peg Reagan	Charles Rinehart	Gail Rozek	Kat Sauter	Trevitt Schultz	Jane Shippy
Helen Real	Carol Ritchie	Ari E Rozycki	Lynne Savage	Carl Schumacher	Bridget Shirey
P Reay	Randi Rittman	Carol Ruby	Riccardo Savi	Angela Schwartz	Joe Shirk
Judy Redding	Melissa Rivard	Stuart Rudolph	Hank Saxe	Jean Schweibish	Erin Shoemate
Margaret Redmond	Dylan Robards	Sandra Rudy	John Scahill	Luann Schweitzer	Jamie Shohan
Karolyn Redoutey	Terry Robb	Karen Ruppert	Debra Scalice	Catherine Schwering	Michael Shombeery
Shannon Reed	Mark Roberts	Wanda Rurak	Wayne Scallon	Bronwyn Scott	Duane Short
Linda Reens	Bruce Robertson	Dean Ruscoe	William Scanlan	Jason Scullion	Laurel Showstack
Michael Rees	Danielle Robillard-	Elgrit B. Russell	Dick & Jan Scar	Josiah Q. Seale	Nancy Shrewsbury
Calvin Reeves	Flower	Joe Russo	Rickey Scarbrough	Joni Seals	Mike Shriberg
C Reeves-Rutledge	Leslie Robinette	Levanah Ruthschild	Merrilee Scatena	Jerry Seaman	L. Siefert
Kelly Reice	Christopher Robinson	Dale Rutschow	Edward Scerbo	Katrina Seater	Ryan Siesel
Todd Reich	Gina Rocchio	Erica Ryan	Angela Schaab	Rebecca Seavey	Rae Ann Siewert
Robyn Reichert	Tyler Rock	Marc S	Sandra Schachat	Ruth Seeliger	Angela Signore
Brian Reid	Catherine Rodgers	Michael Sackin	Helen Schafer	Claire Sefiane	Yutona Siikavaara
Peter C. Reilly and	Jo K Rodriguez	Rick Sadowsky	Sarah Schaff	Bob Segal	Maya Silliman
Maureen A. Flannery	Kenneth Roe	Adam J Sagert	Michael Schaper	Pam Seidenman	Jason Silverio
Gene Reimer	James Roeder	Fumiko Sakoda	Charles Schartung	John Seider	Michael Silverman
Richard Reinoehl	Kelsey Rogan	Cody Salinas	Terry Schaunaman	Neil Seigel	Lisa Silvey
Jozef Reintjens	Jackson Rogers	Thomas Salmini	Arielle Schechter	Leslie Seki	Korey Simeone
Katharyn Reiser	Bruce Rogow	Richard Sam Salmon	Rick Scheffert	Brenda Seldin	Lindsay Simmonds
Debbie Reisert	Richard Roland	Ken Salo	Russell Scheidelman	Krista Seller	Kathryn Simmons
Kelly Reiss	Barbara Roman	Jorge Salotto	Joe Scheidler	Dan Semler	Linda Simpson
David Reister	David Romano	James Salva	Crystal Schenk	Janet Senneker	Angela Sims
Michael Religa	Aaron Romero	Virginia Salvin	Sandy Schepis	Jennifer Serrano	Darcie Sinclaine
Connie Rempel	Sarah Romitre	Jaya Salzman	Chris Schiller	Mark Severino	Thomas Singleton
Christien Renee	Melbourne Romney	Philip Samuels	Sheryl R Schindler	Mike Sexton	D. William Sinnett
Clark Renfro	Shawn Rorke-Davis	Ann Sanchez	Sarah Schlichter	Sharon Shadbolt	Laura Sisk
Kent Renno	Ted Rose	Bette Sandall	Kerri Schlottman	John Shadowfax	Douglas Sittler
Aimee Renteria	Mari Rosen	Scott Sanders	Lynn Schluns	Nileen Shadowhawk	Mark Sitton
Elaine Repschlaeger	Mary Rosenbeck	Peter Sandoval	Megan Schmall	Rhiamon Shae	Sue Sjolin
Lorraine Reyna	Heather Rosenberg	Jean Sandow	Nicholas Schmidt	Nandita Shah	Tabatha Skelton
Robert E Reynolds	Lara Rosenblith	Kris Sands	Cassie Schmitz	Harriet Shalat	Mary Beth Skeuse

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Sara Skinner	Nancy Spears	Steven Stocker	Tracy Swenson	Douglas Thunberg	Philip Turner
Ned Skipper	Jennifer Speciale	Frank Stoffers	Christopher M Swift	Rick & Beth Thurber	Jennifer Turner-
Melissa Sklar	Monica Speck	Donald Stokes	Anne Swigart	Sarah Thurmond	Wilkinson
Dennis Skudney	Robert A. Speizer	Charles L (Chuck) Stoll	Sheila Swigert	Eric Tillman	David Turnoy
David Slater	Patrick Spencer	Meredith Stone	Michele Swing	Charles Tillotson	Sherida Tutor
Marcia Slatkin	Linda Sperling	Debra Stonebraker	Kris Sykes	Ralph Timberlake	Laurie Tuttle
Thomas Slawson	Edward Spevak	Janet Stoner	Cs Symington	Don and Roberta	Holly Twining
Barbara Slemmons	Tom Spindler	Elizabeth Storey	Tina Syphus	Thurstin Timmerman	Mark Tynan
Tisha Sloan	Glenys Spitze	Suzanne Storm	Shirley Sysum	David Timson	Max Tyomkin
Elizabeth Slone	Brett Spivey	Sam Stormont	Gail Szanyi	Lolly Tindol	Marcy Ugstad
Lauryn Slotnick	Judith Springer	Ken Stott	Jennifer Szoke	Erika Tingey	Sarah Uharriet
Shaun Smakal	Todd Springett	William Stout	Tera T.	Lynnette Titus	Lola Ulvog
B. Casey Small, Esq.	Liane Ssell	Jeremy Stover	Steve Tabor	David Tobias	Leilani Ungaro
Mike Smith	Leslie St.Pierre	Michael R Stowe	Deanna Tachna	Sr. Sean Marie Tobin	Jerry Unruh
Lorri Smith-Bates	Robert Stabbert	Dawn Stowell	Mark Tadder	Jeremy Tokat	Meris Untalan
Ms. Roberta D.	Jack Stabley	Dow Strader	Kathy Tafel	Raymond Toldo	Stuart Updegrave
Smolenski	Evan Stafford	Christina Strasdas	Amy Tajdari	Robert Tolfree	Kelley Updike
Gerald Smolinsky	Charlotte Stahl	Joe Strassner	M K Talbott	Patti Tomasello	Clay Uptain
Daniel A Smuts	Ruth Stambaugh	Patsy Stratton	Elizabeth Tallakson	Eric Tomaskik	Lesley Urasky
Kathleen Sneed	Gary Stanfield	Jenessa M. Strickland	Mindi Tambellini	Lisa Tomkosky	Marc Urbaitel
Carolyn Snegoski	Cary Stanford	John Strickler	Roxanne Tandberg	Claire Tompkins	Joshua Valencia
Ann Sniedze	R Stanton	Phil Stripling	Helen Tanguis	Arim Topete	George Valentine
Lee Snowberg	Acy James Stapp	Robert Strobel	Christine Taniguchi	R Torreano	Tina Van Camp
Larry Snyder	Johnnie Stark	Carol Stronstorff	Carole A. Tante	Karrie Torres	Paula Van De Werken
Alla Sobel	Alex Stavis	Susan Stross	Margaret Tash	Alan Torrise	Adrian F. Van Dellen
Jerald Sody	William Stavisky	Sarah Strotman	Yvonne Tasker-	Sarah Tosh	Ron Van Der Eerden
Celia Sofie	T Steadman	Christopher Strunk	Rothenberg	Terry Towers	Valerie Van Der Meer
Marie Sokoloski	Timothy Stebler	Gregory Stuart	Elizabeth Tatum	Marian Towles	Jenny Van Dorsten
Victor Solano	Katrina Stechler	Sheree Stuckert	Mike Tauber	Ron Tragesser Jr.	Dean Van Gundy
Greg Solberg	Lisa Steckhouse	Scott Stuckman	Jeff Trapp	Jeff Trapp	Alice Van Leunen
Ana Yong Soler	Kim Steele	Hilary Studebaker	Laura Traynham	Laura Traynham	Jeff Van Osdol
James Solley	Gretchen Steen	Michelle Stumbo	Dan Treinis	Dan Treinis	Robin Van Tine
Eric Sollien	Dana Steeples	Robert Stump	Glenda Jean	Glenda Jean	Betty J. Van Wicklen
Harlan Solomon	Courtney Stefano	Chris Sturgess	Fran Teders	Tremewan	John Vance
Jody Solow	Klaus Steinbrecher	Jim Styn	Kezia Tenenbaum	Tia Triplett	David Vandermast
Trevor Somers	Sarah Steiner	Bahira Sugarman	Carol Tepper	Tapan H Trivedi	Dr. Debby Sue
Joann Sonenstein	Thomas Steines	Dustin Sulak	Tatjana Terauds	Mary Troland	Vandevender
Robert Soper	Jim Steitz	Ann Sullivan	Theresa Terhark	Greg Tropea	Janice Vandusen
Betty Soreide	Bill Stender	Dot Sulock	Gerald Terwilliger	Lura Trossello	Matt Vannus
Paula Sorensen	Shirley Stephenson	Kristin Summerlin	Cheryl Thacker	Andrew Trout	Jim R. Vanosdell
Cristina Sorrentino	Jared Stern	Jim Summers	Tor The Nomad	Toni Ann Troy	Lezlie Vanover
Richard Sorrento	Erin Steurer	Allison Sumner	Barbara Thetford	James Trujillo	Chris Vargis
Sandee Sousa	Brooke Stevens	Dot Sumpter	Gary Theut	Leon Trumpp	Linda Varian
Thomas Southern	James Stevenson	Craig Sumyre	Ursula Thieme	Ashlin Tucker	Jeff Vasey and
Glen D Southwick	Natalie Stewart	Nida Sun	Corri Thom	Leon Tudyk	Samantha Nisson
Joseph Sozzani	Lydia Stewart Castle	Lisa Sunde	Mary Thomas	Toni Tumonis	June Vassallo
Julee Spangler	Alexa Stickel	Jane Sunshine	Ani Thompkins	Tiffany Tunich	Karen Ziomek Vayda
Thomas Sparks	Paula Stiles	Jerry J Sutherland	Lynn Thompson	Syd Tupaj	Grant Vecera
Todd Spear	Richard Stimson	Blaze Suzan	Renee Thomson	Mark Turbin	Gary Vedvik
Mary Spearman	Amber Stine	Steve Swartz	Eric Thu	Jeanne Turgeon	Lamont Venardos

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

John Venezia	Barbara Warner	Lois White	Genevieve Woodard	Sam Zappala	Robert Anthony
Joanne Vennetti	Gordon Warren	Tanja Whited	Angela Woodcock	Mark Zappone	Eric R. Apple
Steven Verry	Jeffrey Warwick	Richard Whiteford	Eric Woodlock	Paul Zarchin	Tina Arnold
Gerald Vertrees	Lindsay Waskey	Edward Whitehead	Greg Woodruff	Wendy Zawacki	Kristina Aston
Allison Vetter	Lee Waterhouse	Aimee Whitman	Reverend Brandie Woods	Teresa Zawiskie	Martha Atkinson
James Vickers	Laura Waters	Lori Whitney	Shaun Woodson	Matthew Zedler	Patrick Aubuchon
Manuela Vieira-Daponte	Lyn & Janis Watkins	Linda Whitten	Garlynn Woodsong	John Zedolik	Kate B.
Ronald Vigar	Porter Watson	Therese Wick	Tia Woodward	Jeff Zell	Joan Bailey
Jan Vigne	Charles S Watson, Jr	Laura Wickersham	Kerala Woodworth	Raleigh Zellers	Tim Bailey
Alan Villavicencio	Benita Watters	Erika Widener	John Woolsey	John Zemek	Jonathan Baker
John Vinson	Chad Wawrzyniak	Rev Eugene Widrick	Katharine Wooten	Kerri Zemko-Kriz	Jp Baker
Susan Voll	Frances Wear	Gloria Wiemann	Tom Workman	John Zender	Karen Baker
Allan Vollendorf	Marcia Weare	Corenna Wieselmann	Rev. Richard Workowski	Lyn Zerlin	Pamela Baker
Linda Von Merta	Dianna Weaver	Joseph Wiesner	Cheryl Works	Dawne Ziegler	Stephen Baker
Curtis Von Trapp	Brad Webb	Adam Wiggins	Chris and Erica and Family Worrell	Roger Zimmerman	Daniel Ball
Blake Vonderheide	Marc Weber	Gail Wilcox	Frank Worshek	Robert Zinn	David Banner
Niki Vonhedemann	Marie Webster	Lynn Wilczek	Kari Wouk	Carolyn Zinns	Jennifer Banoczy
Diana Vonholdt	Sidney E. Wechsler	Marika Wilde	Mark Woynicz	Thomas Zissu	Walter Barnes
Bill & Marilyn Voorhies	Elizabeth Wedel	Jeffrey Wiles	Robert E. Wozna	Conrad Zobel	Jim Barton
William Vorachek	Margaret Weeks	Jennifer Hocking Wiley	Owen Wozniak	Michael Zuber	Nancy Bates
Kathryn Vore	Paul Wegemann	Paul Wilgus	Theodore Woznick	Jane Zuke	Scott Bates
Aaron Voreis	Charles Wegener	Stephen Willeumier	Cathryn Wright	Michael Zyzda	Karen Bauer
Jessie Vosti	Thomas Weickert	Martyn Williams	Irma Wuertz	Frank Aaron	Lynn Bauer
Bill W.	Steve Weigner	Patrice Williamson	Angie Wulfow	Rob Aaron	Kevin Bauman
Pat Wade	Sherry Weiland	Beverly Williamson-Pecori	Bryan Wyberg	Bill Abelson	Rebecca Bauman
Margaret Waggoner	D. Weiler	Jennifer Willis	Jessica Y	B G Adams	Joan Beck
Jim and Virginia Wagner	Isabel Weimar	Monika Willisegger	William Yake	Barb Adams	Jonathan Beck
Davette Wakefield	Jordan Weiner	Summer Wilson	Natasha Yannacanedo	Evelyn Adams	Ruth Beck
Wendy Wakula	Diane Weinstein	Tom Wiltzius	Michael Yannell	Jamie Adams	Thomas Beck
Bret Walburg	Bridgette Weir	William Wing	Christine Yap	Thoms Adamski	Gregg Bell
Garry Walczewski	Tom Weis	Alyssa Winick	Karen Yarbrough	Christie Allen	Teja Bell
Mack Waldrip	Sandy Weisto	Jeff Winston	Linda Yarnell	Dennis Allen	Janet Bender
Robert (Chip) Waldron	Mike Welker	Joel Winter	H Yarrow	Judy Allen	Regina Benge
Martha Walker	Jason Wells	Genevieve Winters	Courtney Yarsley	S.O. Allen	Brooke Bennett
James Wall	Lorien Wendt	Warren Withers	Joan Yates	Sheryl Allen	Tucker Bennett
Lawrence Wallman	Karen Wening	Julia Withington	Susan Yatsky	Susan Allen	Cris Benton
Peter Wallrich	Angela Werneke	Cindy Witt	Rachel Yankinson	Erick Andersen	Jon Benton
Had Walmer	Katherine Wessling	Diana Wittenbreder	Arnold and Louise Yorra	Bradley Anderson	Kristin Berger
Cathleen Walp	John West	Charley Wittman	Thomas Young	Christine Anderson	Chrisley Bernucca
Terry Walsh	Ellen Westbrook	Shirley Wold	Heather Youngman	Clark O Anderson	Harrison Bertram
Cj V Walter	Claudia Westendorf	Martin Wolf	Patricia Youngson	Constance Anderson	Paul Bertram
Virginia Waltermire	Pieters	Mark Wolfe	Jennifer Wolfson	David Anderson	Mark Betz
Cynthia and George Waltershausen	Karen Westerlund	Wayne Wolfram	Wendy Woller	Jon Anderson	Theresa Bianchi
Marie Walz	Katherine Westfall	Jennifer Wolfson	Alix Woltjer	Mark Anderson	Harold Bingham
Ron Wambach	Melody Westlake	Wendy Woller	Tim Wong	Michael Anderson	Agnes Bird
Timothy Wampler	David Wexstein	Elizabeth Wood	Kimberly Zalewski	Michael J Anderson	Susan L Bishop
Jeff Ward	Elizabeth Wheat			Tori Anderson	Brianna Black
	Marsha Wheaton			William Anderson	Jeffrey C Black
	Marc Wheeler			Laura Andersson	Michael Black
	Dawn Whitaker			Ryan Andrews	Selma Blair

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Louise Rose Blume	Kathleen Campbell	Peggy Conroy	Courtney Dubois	Kelly Fuller	George Hamilton
Julie Booth	Patricia Campbell	Beverly Conway	Diane Dunlap	Tonda Fuller	James Hamilton
Jerry Boyd	Perry Campbell	Brick Conway	Erin Dunleavy	Will Fuller	Sheila Hamilton
Drew Bradbury	Ron Campbell	Eva Millette Coombs	Judith Dyer	Barbara Gallagher	Tracey Hammer
Marty Bradbury	Paul Carlson	Kelly Cooper	Mary Dyer	Kathy Galligan	William Hampton
Ken Bradley	Toni Carmichael	Mont Cooper	Bob Edwards	Thomas Gardner	Howard Hanna
Basin Branch	Jerry and Charles	Naomi Cooper	Dave Edwards	Patrick Gavin	Harley Hansen
Christine Braun	Carpenter	Matthew R. Courter	Robert Edwards	Nikki Gentry	Johnna Hansen
Carle Brown	Loren Carpenter	Kevin Cox	Roger Edwards	Cathleene George	Torri Hansen
Clayton Brown	Bryanna Carroll	Lylanya Cox	Garth T Elliott	Christy George	Torri Hansen
Danny A Brown	Mark Carroll	Shannon Cox	Brian English	Kristine George	Chris Hanson
David Brown	Elizabeth Case	Elizabeth Case	Stephanie English	Lee Gibson	Lori Harmon
Deanna Brown	Doris Cassidy	Peter Craig	Crystal Erickson	Stephen Gibson	Sue Harmon
Erin Brown	Kai Chan	William Craig	Jude Erickson	Valarie Gibson	Ed Harris
Fred Brown	Gabriel Chavez	Mark Craven	Carol Evans	William Gibson	Linda Harris
Gary Brown	Mary Cherry	Alicia Crews	Chuck Evans	Jennifer Gilmartin	Suzanne Harris
Lauren Brown	Wes Cherry	Deborah Crews	Dinda Evans	Betty Glass	David Harrison
Marjorie L. Brown	Paula Chihill	Jonathan Crews	Kristen Evans	David Goldstein	Dnew Harrison
Monica Brown	Brian Clark	Stephen Crockett	William Evans	Alejandro Gomez	Kay Harrison
Nancy Brown	Colleen J.G. Clark	Peter Cronin	Benjamin Farrell	Erika Gomez	Paige Harrison
Patrick Brown	Diana Clark	David Crouch	Sheryl Ferguson	Marisa Gomez	Gregory Hartley
Richard Brown	John Clark	Marcia Cummings	Susan Ferguson	Lucy Goodman	Karen Hartley
Rick Brown	Jon Clark	Dave D	Al Fink	Kathy Goodwin	Jeff Hayes
Rosa Brown	Katherine L Clark	Duane Dann	Darcy Fischer	Donald Graham	Scott Hayes
Rose Brown	Martina Clark	Brian Davis	Elaine Fischer	John L Graham	Kathleen Heaney
Susi Brown	Montgomery Clark	Dixie Davis	Darius Fisher	Susan Graham	Ted Heinz
Tristan Brown	Shirley Clark	Ed Davis	Joanne Fisher	Bill Gray	Dewitt Henderson
Marcia Bruce	Susan Clark	George Davis	Kimberley Fisher	Joanne Gray	Scott Henderson
Michelle Bruce	Thomas Clark	Jeffrey Davis	Mary & Gerald Fisher	Dave Green	Claudia Hendrickson
Joseph Bryant	Tim Clark	John J Davis	Mary Fisher	Doug Green	Michael Henry
John Buchanan	William Clark	Kaitlin Davis	Mary Fisher	Jordan Green	Tracy Hensley
David Paul Xavier	Kathy Cody	Mark Davis	Tonya Fisher	Lora Green	Joe Herbst
Burch	Brian Coffey	Stan Davis	Katie Fite	Steve Green	Mary Herbst
Angela Burgess	Gracie Coffey	Pat Davison	Paul Fleming	Edward Gregory	Dr. Bradley Higgins
Mike Burgess	Robert Coffey	Dennis Day	Constance Fletcher	K. Griffin	Jeffery Hill
John Burke	Bruce Cohen	Reid Decker	Ethan Fletcher	Nancy Griffin	Joann Hill
Patricia Burke	Daniel Cohen	D.D. Delaney	Herb Fong	Ellen Griffith	Karen Hill
Anthony Burns	Howard Cohen	George Delaney	Glenn Ford	Helen Griffith	William Kay Hill
Denise Burns	Megan Cohen	John Delong	Merritt Ford	Jennifer Griffith	Cyndi Hoffman
Sarah Burns	Nayana Cohenour	Alex Diaz	Paul Foster	Paul Griffith	Kathy Hoffman
Harvey Buskirk	Jonathan Coker	Tod Ditommaso	Linda Fowler	Catherine Haber	Lisa Hoffman
Brenda Butler	Barbara Cole	James Dixon	Donivan Fox	Jon Hager	Cynthia Hogan
Deborah Butler	Cal Cole	Barbara Dobson	Brad Frank	Marycie Hagerty	Martha Hogarth
Gwendolyn Butler	Merrill Cole, Ph.D.	Chuck Dodd	James Frank	Allain Hale	Joshua Holden
Denis Byrne	Brian Collins	Elizabeth Dodd	Lee Frank	Sarah Hale	Mary Holder
Nicholas L. Cain	Carol Lynn Collins	Michael Donaldson	William Frazier	Ashleigh Hall	Robin Holman
Christopher Caldwell	Patricia Collins	Mercy Drake	Jeanne Freeland	Maggie Hall	Brad Holmes
Bob Campbell	Steven Collins	Michael Drake	Linda Freeman	Myra Hall	Ashley Holt
Chris Campbell	Rick Conner	William Drake	Robert Friedman	David W Halligan	Victoria N Hoover
David Campbell	Kathleen Conroy	Denise Driscoll	Christopher Frost	F. Hamilton	Lee Hopkins

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Mark Hopkins	Karen Johnson	Zoe Laird	Scott Macdonald	Daniel Mims	Madeline Oleson
Paul Hopkins	Kurt Johnson	Mary Ann Lambert	Sarah Mahoney	Jeanne Minor	Shawn Olsen
Stan Hopkins	Larry Johnson	K. Landa	Greg Maloney	Anna Mitchell	Andrea O'Neal
Hildegard Howard	Mary L. Johnson	Chris Lane	Lisa Maloney	Chuck Mitchell	Megan O'Neal
Holly Howard	Mike Johnson	Diana Lane	Charles Manges	Diana Mitchell	Joyce O'Neill
Judith Howard	Pat Johnson	Marlena Lange	David Marks	Erica Mitchell	Jim Otto
Lee Howard	Sharon Johnson	Theresa Lapean	Edna Marshall	James Mitchell	Beata Owczarczyk
Richard Howard	Tim Johnson	Dale Larson	Judy Marshall	Julie Monaghan	Alix Owens
Wendy Howell	Mary E. Johnston	Matt Larson	Lisa Marshall	Audrey Moore	Gary Owens
Linda Hoyt	Timothy Johnston	Seanna Larson	Bill Martin	B.R. Moore	Mary Owens
Kelly Huffman	Bill Jones	Frank Lawton	Corinne Martin	David Moore	Robert Owens
Marian Hull	Don Jones	Joneen Lawton	Drew Martin	Deborah Moore	Amberly Palmer
Sara Hull	Elliot Jones	Howard Lazzarini	Gail Ann Martin	Jay Moore	Elizabeth Parke
Cashin Hunt	Jeff Jones	Shoko Lazzarini	Justin Martin	John K Moore	Jeff Parker
Doug Hunt	Jeff Jones	Jeri Lee	Katrina Martin	Mardell Moore	Ken Parker
Linda Hunt	Leah Jones	Jon Lee	Lee Martin	Robert Moore	Andrew Patrick
Peggy Hunt	Leahlin Jones	Jonathan Lee	Patricia Martin	Barbara Morgan	Bart Patterson
Thomas H Hunt	Mark Jones	Richard Lee	Ron Martin	Colleen Morgan	Bruce Patterson
Christian H Hunter	Miriam Jones	Richard Lee	Todd Martin	Donald Morgan	Shirley Patterson
M Hurst	Mitch Jones	Susan Lee	Glenna Mason Pope	Jeff J Morgan	Joseph Payne
Starr Hurst	P Jones	Sarah Lemieux	Harris	Louise Morris	Kathern Pearson
Kathie Ingram	Patricia Jones	Doris Leonard	Pearl Mccullough	Vicki Morris	Sandra Pearson
Harriet Irby	Heidi Jordan	Ben Levin	Mary Lou Mcdonald	Kassandra Morrison	Tim Pearson
Bruce Jackson	Teresa Jordan	Brian Levin	Meg Mcdonald	Marla Morrison	Tamra Perez
Debi Jackson	Brian Kaye	Ross Levin	Suzie Mcgill	R Morrison	Bill Perry
Jane Jackson	Ms. Maureen Keller	Michael Lewis	Gail Mclglone	Laurie Moss	Debbie Perry
Terri Jackson	Ron Kelly	Rebekah Lindberg	Matthew M McGuire	Jack Motter	Nathan Perry
Tom Jackson	Wayne Kelly	David Lindsey	Kent Mclaughlin	Emmett J. Murphy	Rob Perry
Chris Jacobs	Alison Kennedy	Erin Lindsey	Robert J Mclaughlin	Erica Murphy	Gregory Peters
Ann Jacobson	Ann Kennedy	Cynthia Little	Alisa Mcmahon	Jonerik Murphy	Barbara Peterson
Billie Jean James	Brenda Kennedy	Stanley Logan	Jennifer Mcmahon	Robert Murphy	John Peterson
Timothy James	Karen Kennedy	Beth S. Long	Mary Mcmann	Christina Myers	Tim Peterson
Jendra Jarnagin	Sarah Kennedy	Catherine Long	Evelyn Mcmullen	Corinne Myers	Dennis Phillips
Herbert Jennings	Pam Kimball	Kristen Long	Theodore Mertig	Donna Nelson	Jeff Phillips
Joe Jennings	Dawn Kimble	Nichole Long	Larry Meyers	Eileen Nelson	Scot Phillips
Nayana Jennings	Bill King	Rebecca Long	Becky Miller	Jessica Nelson	Sarah Piechuta
Joel Jensen	Dusty King	German Lopez	Brenda Miller	John Nelson	Robin Pitt
Lori Jensen	Jill King	Gina Lopez	Constance Miller	Roger Nelson	Bev Pollard
Andrea Johnson	Kerri King	Stephanie Love	David Miller	Steven Nelson	David Xc Pollard
Andrew Johnson	Lana Kirby	Ron Lutz 2Nd	Dick Miller	Mike Newell	Alisa Porter
Carol Johnson	Nancy Kirby	Wendi and Ed Lutz	Dusty Miller	Barbara Newton	Tim Porter
Chrissie Johnson	Laura Klotz	Christopher Lynch	Jean Miller	Dub Newton	Celia Powell
Christopher Johnson	Peter Koch	Gail M. Lynch	Jill Miller	Allan Nichols	Dawn Powell
Claudia Johnson	Elaine Koplik	Nicholas Lynch	Joseph Miller	Roy E Nichols	Lynn Powell
Dan Johnson	Scott Korman	Sandra Lynn	Laura Miller	Scott Nicol	Michael Powell
Douglas Johnson	Cathay Kramer	Susan Lynn	Michael H Miller	Natalie Nobles	Herbert Powers
Freddie Johnson	Dann Kramer	T. Lynn	Mitchell Miller	Peter Nolan	Michele Powers
Janet Johnson	Denali Krampe	Anthony Lyons	Morris B. Miller	Anita Norris	Wendy Powers
Jeff Johnson	Brad A Krebs	Astrid Lyons	John Mills	Bridget O'Brien	Carl Pratt
Jennifer Johnson	Carrie Kube	Denise Lytle	Nancy Mills	Joan O'Brien	Jennifer Price

Appendix N: Comments and Responses
Section 3: Agencies and Persons Submitting Comments on the Draft

Stacey Putman	Kali Rowe	Kathleen Smith	Ted Tash	Scott Warren	Michael Wilson
Frederick Quinn Iv	Barbara Russell	Kathleen Smith	Alison Taylor	Tom Warren	Sara Wilson
Peggy Rainey	Cynthia Russell	Kellie Smith	Angeline Taylor	Mark Watkins	Tim Wilson
David Randall	Michael Russell	Ken & Sally Smith	Bert Taylor	Adrienne Watson	Racheal Winston
Kathy Rapp	Cara Russo	Lucy Smith	Cynthia Taylor	Claire Watson	Darlene Wolf
Richard Ray	Curtis Ryan	Mack Smith	Debbie Taylor	Donna Watson	Robert Wolf
Hank Raymond	Michelle Ryan	Marshall Smith	Elaine B. Taylor	Dorothy Watson	Thunderr Wolf
Marcy Reed	Dawn I. Sanchez	Michael Smith	Grover Taylor	Meg Webb	Alan R. Wolfe
Nora Reed	Justin Sanders	Michael Smith	Linda Taylor	Earlene Webster	Barbara Wood
Stacy Lenore Reed	Ani Sandoval	Nicole Smith	Raili Taylor	Cynthia Weeks	Carol Wood
Rachel Rees	Stuart Sands	Paul K. Smith	Rosemary Taylor	Holly Welker	Emily Wood
Sandra Reeves	Biefke Vos Saulino	Randall Smith	Natalie Tenenbaum	James Welker	Angela Woodcock
Danny Reich	William Schramm	Robin Smith	James Thetford	Amanda Wells	Judith Woods
Michael Reilly	Adam Schwartz	Sydney Smith	Amanda Thomas	Amy Wells	Margaret Workman
Fred Reimer	Ben Scott	Tricia Smith	Bradley Thompson	Karena Wells	Al Wright
Ronald Reimer	Dawn A. Scott	Willow Smith	Elizabeth Thompson	C. Nicole White	C Wright
Cathy Reynolds	Evalyn Segal	Annette Snyder	Kara Thompson	Cheryl White	Cathryn Wright
Lone Rhodes	Diana Shaw	Arlen Dean Snyder	Matthew Thompson	Cynthia White	Christina Wright
Daryl Rice	Jeffrey Sherman	Eleanor Snyder	Stephen Thompson	Dee White	Christine Wright
Nena Rice	Rachel Sherman	William Snyder	Tim Thompson	Eric White	Dave Wright
Vincent Rice	Tillman Sherman	Scott Sobel	Lee Towles	Joan White	Denise Wright
Amy Rich	Betty Shipley	Anita Soper	Sarah Triplett	Karen White	Jillian Wright
Beth Rich	Doug Shohan	Lisa Spangler	Jason Turner	Lynn White	Patricia Wright
Peggy Sue Richards	Seth Silverman	Lynne Stanford	Rene Turner	Mary White	Betty Young
Cynthia Riddle	Barre Simmons	Joanne Steele	Diana Valentine	Mary White	Chris Young
Erin Riddle	Betty Simmons	Kathleen Steele	Ron and Carole Vance	Jon Whitney	Dustyy Young
Erin Riddle	James Simmons	Warren Steiner	Loretta Verry	Chris Wiesner	Geoffrey Young
Mike Rivard	Pamela Simmons	Gary Stevens	Michael Verry	Patricia Wiesner	Jane Young
Adrian Roberts	Paul Simmons	Joan Stevens	John Wade	Barbara Williams	Kathy Youngson
Jason Roberts	Jeff Simpson	Edward Stewart	Dean Wagner	Craig Williams	Judith
Bina Robinson	Emily Sims	Edward Stewart	Leslie Wagner	David Williams	
Faith Ann Robinson	Onie Sims	Iain Stewart	Sienna Wagner	George M. Williams	
Julie Robinson	Tommy Singleton	Jess Stewart	Stacey Wagner	Gilbert S. Williams	
Mary Robinson	Tabatha Skelton	John Stewart	Agnes Walker	Ian Williams	
Paula Robinson	Belinda Smith	Marry Stewart	Frank Walker	Janet Williams	
T Dr Robinso	Beth Smith	Michael B Stewart	Frank Walker	Jennifer Williams	
Tammy Robinson	Brian Smith	Rusty Stewart, Ph.D.	John Walker	Jennifer L. Williams	
Thom Robinson	Bruce Smith	Sharon Stewart	Marjorie Walker	John Williams	
William H. Robinson	Bryan Smith	Anne Stine	Martha Walker	Linda Williams	
Ann T. Rogers	Carl Smith	Bill Stokes	Neil Walker	Margaret Williams	
Jenna Rogers	Chelea Smith	Beatrice Stone	Roy Walker	Robert D Williams	
John Rogers	Chelsea Smith	Mindy Stone	Tracey R Walker	Stephen Williams	
Marisa Rose Sunflower	Claire Smith	Mary Strassner	Stacey Wall	Taffy Williams	
Faraldo	Deborah Smith	Rose Strickland	Brian Walsh	Terese Williams	
Ursa Rose	Don Smith	Jill Sullivan	John Ward	Viki Williams	
Victoria Rose	Edward Smith	Nancy Sullivan	Linda Ward	Alisha Wilson	
Daria Ross	Eileen Smith	Patricia Sullivan	Pamela Ward	Doris Wilson	
Janice Ross	Gerry Smith	Lois Swartz	Harry Warner	Glow Wilson	
Margaret Ross	Jerry E. Smith	Alain Sykes	Lawrence Warner	Jerry Wilson	
Susan Ross	Jonathan Smith	William Tallakson	Gary Warren	Joseph Wilson	