



U.S. Department of the Interior  
Bureau of Land Management

# Northwest California Integrated Proposed Resource Management Plan and Final Environmental Impact Statement



Volume 4: Appendix K,  
Public Comments and BLM Responses

June 2024



Cover Photos (clockwise from top): Yuki Wilderness,  
Sacramento River Bend Outstanding Natural Area, Ma-le'l  
Dunes, Sacramento River Bend

Photo Credit: BLM

---

## TABLE OF CONTENTS

---

K      Public Comments and Responses

This page intentionally left blank.



---

# Appendix K

## Public Comments and Responses

This page intentionally left blank.



---

# TABLE OF CONTENTS

Chapter

Page

---

**APPENDIX K. PUBLIC COMMENTS AND RESPONSES .....K-I**

K.1	Comment Analysis Process.....	K-1
K.1.1	Draft RMP/EIS Public Comment Period.....	K-2
K.1.2	Letter Campaigns.....	K-3
K.1.3	Comments by Category.....	K-3
K.2	How to Read This Volume.....	K-5

This page intentionally left blank.



# Appendix K. Public Comments and Responses

This volume presents comments the Bureau of Land Management (BLM) received on the Draft Northwest California Integrated Resources Management Plan (RMP) and Environmental Impact Statement (EIS). It also includes a description of the public comment process, how the BLM considered all comments, and responses to all substantive comments.

## K.1 COMMENT ANALYSIS PROCESS

The National Environmental Policy Act (NEPA) requires that all substantive comments received before reaching a decision must be considered to the extent feasible, and that agencies must respond to all substantive written comments submitted during the public comment period for an EIS (40 CFR 1503.4). Comments must be in writing (including paper or electronic format or a court reporter's transcript taken at a formal public meeting or hearing), substantive, and timely, in order to merit a written response. Further, consistent with the BLM's planning regulations, the public "shall be provided opportunities to meaningfully participate in and comment on the preparation of plans, amendments and related guidance and be given early notice of planning activities" (43 Code of Federal Regulations [CFR] 1610.2[a]).

BLM diligently reviewed and analyzed each comment letter to identify all substantive comments. In performing this analysis, the BLM relied on Section 6.9.2, Comments, in the BLM NEPA Handbook H-1790-I to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information or analysis in the EIS
- Questions, with a reasonable basis, the adequacy of the information or analysis in the EIS
- Presents reasonable alternatives other than those in the Draft EIS that meet the purpose of and need for the proposed action and addresses significant issues
- Questions, with a reasonable basis, the merits of an alternative or alternatives
- Causes changes in or revisions to the proposed action
- Questions, with a reasonable basis, the adequacy of the planning process itself

Additionally, the BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis—Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are considered substantive; they may or may not lead to changes in the Final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the BLM Authorized Officer responsible for preparing the EIS does not think that a change is warranted, the response should provide the rationale for that conclusion.

- **Comments That Identify New Impacts, Alternatives, or Mitigation Measures**—Public comments on a Draft EIS that identify impacts, alternatives, or mitigation measures that the draft did not address are considered substantive. This type of comment requires the BLM Authorized Officer to determine if it warrants further consideration; if so, he or she must determine if the new impacts, new alternatives, or new mitigation measures should be analyzed in the Final EIS, in a supplement to the Draft EIS, or in a completely revised and recirculated Draft EIS.
- **Disagreements with Significance Determinations**—Comments that directly or indirectly question, with a reasonable basis, determinations on the significance or severity of impacts are considered substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the BLM Authorized Officer does not think that a change is warranted, the BLM's response should provide the rationale for that conclusion.
- Comments that failed to meet the above description were considered non-substantive.

#### **K.1.1 Draft RMP/EIS Public Comment Period**

The BLM published the Draft RMP/EIS on September 29, 2023. The public comment period to receive comments on the Draft RMP/EIS ended on December 28, 2023. The BLM received written comments by mail, email, and the online comment form via ePlanning.

The BLM held in-person and virtual public meetings during the Draft RMP/EIS comment period. A list of the meetings and meeting dates are provided below.

- October 23, 2023: Virtual Public Meeting
- October 30, 2023: In-person Public Meeting (Loleta, California)
- November 2, 2023: In-person Public Meeting (Redding, California)
- December 13, 2023: Virtual Public Meeting

Comments received covered a wide spectrum of thoughts, opinions, ideas, and concerns. The BLM recognizes that commenters invested considerable time and effort to submit comments on the Draft RMP/EIS. The BLM developed a comment analysis method to ensure that all comments were considered, as directed by NEPA regulations. This systematic process ensured the BLM tracked and considered all substantive comments.

On receipt, each comment letter was assigned an identification number and logged into a database that allowed the BLM to organize, categorize, and respond. The BLM coded substantive comments from each letter to appropriate categories, based on content, and the link to the commenter was retained. The categories generally follow the sections presented in the Draft RMP/EIS, though some related to the planning process or editorial concerns.

The BLM grouped comments similar to each other together and prepared one response for each group of similar comments. The responses were crafted to respond to the comments and to note if a change to the EIS was warranted.

The BLM received a total of 854 comment letter submissions; 111 of these were considered unique submissions, and 743 were part of form letter campaigns. Many comments received throughout the comment analysis process expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft RMP/EIS, or represented commentary on management actions that



are outside the scope of the RMP/EIS. These commenters did not provide specific information to assist the BLM in making a change to the existing action alternatives, did not suggest new alternatives, and did not take issue with methods used in the Draft RMP/EIS; the BLM did not address these comments further in this document.

The BLM read, analyzed, and considered all comments of a personal or philosophical nature and all opinions, feelings, and preferences for one element or one alternative over another. Because such comments were not substantive, the BLM did not respond to them. It is also important to note that, while the BLM reviewed and considered all comments, none were counted as votes.

Subject matter experts reviewed comments that recommended additional studies, data, or scientific literature to be incorporated into the analysis; new information and citations were incorporated into the Proposed RMP/Final EIS as appropriate. Comments citing editorial changes to the document were reviewed and incorporated.

### K.1.2 Letter Campaigns

Several organizations and groups held standardized letter campaigns to submit comments during the public comment period for the Draft EIS. Through this process, their constituents were able to submit the standard letter or a modified version of the letter indicating support for the group's position on the BLM management actions. Individuals who submitted a modified standard letter generally added new comments or information to the letter or edited it to reflect their main concerns. The BLM received 743 form letters from 4 separate campaign letters, most of which were identical to the master letter. Modified letters with unique substantive comments were given their own submission number and were coded appropriately.

### K.1.3 Comments by Category

The BLM received most correspondence via email comments submitted through the project email or to the BLM project manager during the public comment period. The following table summarizes the distribution of comments by category. These categories were used to group similar comments while preparing responses to substantive comments submitted to BLM during public comment period.

<b>Substantive Comments</b>	
<b>Commenter</b>	<b>Number of Comments</b>
<b>Government Agency</b>	
California Natural Resources Agency	2
EPA Region 9	2
North Coast Regional Water Quality Control Board	3
<b>Individual (Last Name)</b>	
Alderson	1
Best	1
Butler	1
Cabral	1
Cann	9
Carlton	1
Crellin	5
Cullars	2

Commenter	Number of Comments
Dorsey	1
Fissel	1
Gilbaut	1
Green	3
Griffith	2
Hoover	1
Hughes	1
King	1
Lincoln	4
Master	2
Murchison	3
Neal	5
Not Provided	7
Pedersen	8
Randall	2
Rankin	12
Reifsnider	2
Rios	4
Roberts	3
Sadowski	2
Simpkin	2
Sorenson	1
Straub	2
Tenorio	3
Venturino	3
Wasielewski	1
<b>Organizations</b>	-
American Whitewater	17
Amphibian Refuge	2
BlueRibbon Coalition	10
California Four Wheel Drive Association	16
CalWild	6
Capital Vehicle Trail Association	71
Center for Biological Diversity	4
Center for Large Landscape Conservation	34
Conservation Lands Foundation	94
Defenders of Wildlife	18
Friends of the Lost Cost	5
Golden State Salmon Association	1
Hunting and Shooting Sports Roundtable	3
Hypower, Inc	6
InterTribal Sinkyone Wilderness Council	5
Maryland Ornithological Society	1
Northcoast Environmental Center (NEC)	4
Pew Charitable Trusts	27
Rocky Mountain Elk Foundation	5
Safe Alternatives for our Forest Environment (SAFE)	3
Save California's Salmon	12
Shasta Environmental Alliance	6

Commenter	Number of Comments
Shasta Miners Prospectors	1
The Grazing Reform Project	2
Trinity County Fire Safe Council	2
Trout Unlimited	33
Western Watersheds Project	40

## **K.2 HOW TO READ THIS VOLUME**

The BLM assigned a letter number to every comment letter received during the Draft RMP/EIS public comment period. The following tables contain all substantive comments with the BLM's responses; they are organized by the category that comments regarded. Commenter names and applicable organization or agency are provided for letter submissions that did not request that their information be withheld. Complete transcripts of the virtual public meetings can be accessed at the project website here online: <https://eplanning.blm.gov/eplanning-ui/project/2012803/570>

This page intentionally left blank.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Air quality and climate change	11.The agency should adequately consider that 100 years of weather data is not adequate to evaluate the trends of climate change and any conclusions made on this basis are erroneous. 12.The agency should reasonably consider that using average and/or median climate statistics misleads the public because these statistics misrepresent rainfall, temperature, streamflow, etc. as being relatively constant. Instead, the agency should show complete robust data sets and the natural extremes that they contain.	Section D.2.1 adequately explains climate change trends, referencing the Intergovernmental Panel on Climate Change definition of climate change as changes in temperature, precipitation, and other climate variables that persist for decades or longer. Conclusions regarding climate change are not directly evaluated considering 100 years of weather data but are limited to the existing studies and the timeframes considered in the data available. Evidence of weather extremes are discussed in Section D.2.1, explaining to the reader that weather is not constant.The weather data provided is clearly indicated as "median" information, for the purpose of characterizing the climate in the planning area. Raw data can be found at the US Climate Data, the reference provided for the climate Figures D-1 through D-3.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Air quality and climate change	1.The agency should adequately consider that motorized recreation is not a significant contributing factor to purported climate change. 2.The agency should adequately consider that if CO2 is a significant factor; then wildfires and prescribed burns are creating a significant impact and this impact should be adequately addressed and mitigated. 3.The agency should adequately consider that if wildfires are a significant contributor to CO2 and the agency can do something about controlling wildfires.	Section D.2.1 discusses the general scientific consensus that global climate change is occurring, caused in whole or in part by increased emissions of greenhouse gases from human activities – primarily through the combustion of fossil fuels.This includes combustion of fossil fuels from motorized recreation.Additionally, in Section D.2.1 Trends, it is discussed that PM10 and PM2.5 emissions due to wildfires have all been shown to have an increasing trend in California, following the similarly increasing trend of annual wildfire burn acreage. Prescribed burning is used to possibly prevent wildfire ignition, spread, and or severity. Prescribed fires are used to prevent future wildfires from occurring. Therefore, the significance of wildfires and prescribed fires is adequately considered, and the agency will continue to manage and control prescribed fires to prevent damage to the environment, and they are not allowed to create poor air quality conditions.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - general alternative comments	The agency should employ an adequate sense of magnitude so that the record of decision provides a reasonable level of multiple-use and motorized recreation.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process.Alternative C favors community use broadly, including focusing on recreational access and recreational development.Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - general alternative comments	The agency should seek to develop an alternative and analysis that would provide a reasonable level of multiple-use and a decision that would provide more motorized access and motorized recreation.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process.Alternative C favors community use broadly, including focusing on recreational access and recreational development.Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - general alternative comments	The government should adequately consider the significant impacts on the human and natural environment that are created by not returning an equitable amount of the gas tax paid by offroad users to maintain and develop offroad opportunities.	This comment is outside the scope of the RMP and EIS. No change has been made.The BLM applies for and uses state OHV funds to create and maintain high quality OHV experiences in the planning area.These projects are planned and implemented at the implementation level.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - specific change to existing alternative	The agency needs to adequately consider the effects of the earth core slowing down, reversing and the 70-year cycle on climate change. <a href="https://www.sciencetimes.com/articles/41996/20230123/earths-inner-core-reversing-direction-slowing-down.htm">https://www.sciencetimes.com/articles/41996/20230123/earths-inner-core-reversing-direction-slowing-down.htm</a>	The suggested link has been reviewed by the BLM. No change has been made.The NCIP promotes ecological resiliency in the face of climate change. See Section D.2.1, Climate Change Effects on Resources for further discussion.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - specific change to existing alternative	The agency should adequately consider the significant impacts that the massive release of CO2 from wildfires has on the natural and human environment.	The suggested link has been reviewed by the BLM.The NCIP promotes ecological resiliency in the face of climate change. See Sections D.2.1 and D.3.1 for further discussion.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - climate	5.The agency should adequately consider that the road density impact criteria are not site-specific and, consequently, not valid for the project area. 6.The agency should adequately consider that the road density impact criteria over-estimates the impact of motorized recreation on wildlife and does not reasonably consider mitigation measures and alternatives that could be implemented. 7.The agency should adequately consider that the road density impact criteria are not a reasonable measure of motorized impact on wildlife habitat.	Road density impact criteria is not addressed in the NCIP. This comment may be in reference to another plan.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	3. Develop a Reasonable Alternative to Address the Need for Motorized Access and Motorized Recreation for the Elderly, Handicapped, and Disabled 1.The agency should adequately consider that the elderly, handicapped, and disabled need motorized recreational opportunities that are relatively close to town. 2.The agency should adequately consider that the project area is used extensively by elderly, handicapped, disabled and veterans and motorized closures significantly impact this user group. 3. The agency should adequately consider alternatives that would adequately provide motorized opportunities to replace the closure of opportunities close to town. 4. The agency should adequately consider reasonable alternatives that would adequately provide motorized opportunities that adequately meet the needs of the elderly, disabled and veterans. 5. Consideration for motorized trail riding opportunities for the disabled, elderly, and veterans should be given a hard look.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process.Alternative C favors community use broadly, including focusing on recreational access and recreational development.Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-I for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.The Recreation section of the Proposed RMP/Final EIS strives to balance all recreational uses.  The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-I, Row 353) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan.The Land Tenure section of the Proposed RMP/Final EIS (starting on Row 139 of Table B-I) contains goals, objectives, and management direction where the BLM will look for opportunities to improve public access, which could also support motorized public access.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	29.The agency should adequately consider that the public needs to be able to camp and picnic using at least a 300-foot setback from roads for the safety of children and pets and health (dust). 30.The agency should adequately evaluate and consider the public safety issues created by limiting dispersed camping to within 70-foot of a road. Two of our members recently witnessed a family camping within 70-feet of the road whose dog was hit and killed by traffic. The dog owner was experiencing extreme grief and shock. Just imagine a similar incident involving the loss of a child and how devastating that would be for the parents.The 70-foot limitation is not a reasonable restriction for public safety and safe camping.	There is no 70-foot limitation from roadways in the Proposed RMP/Final EIS.This comment appears to be related to a different BLM land use planning effort.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	The agency should adequately consider an alternative that would maximize recreation opportunities in proportion to the needs of actual visitors to the project area.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process. Recreation use and access is less restrictive in Alternative C; the Proposed RMP includes acres for OHV open and limited designations. Further,Alternative C proposed acres within SRMAs and ERMAs that provide unique opportunities for recreation based on public input, current conditions and opportunities, and potential for resource impact.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	The agency should adequately consider and carry forward an alternative that would provide a reasonable level of motorized trail opportunities to meet the existing and future needs of OHV recreationists.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process. Recreation use and access is less restrictive in Alternative C; the Proposed RMP includes acres for OHV open and limited designations. Further,Alternative C proposed acres within SRMAs and ERMAs that provide unique opportunities for recreation based on public input, current conditions and opportunities, and potential for resource impact.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	The agency should adequately consider that E-bikes have become popular in the last 5 years including: a. E-bikes have significant positive impacts on the human environment. b. E-bikes do not have any greater impact on the natural environment than mountain bikes. c. E-bikes should be allowed on all non-wilderness trails. d. E-bikes should be legal to use everywhere except for congressionally designated wilderness for people who are over 55 years of age or have a qualifying physical limitation. e.The Agency should give E-bikes proper procedural consideration including public input on their use on all existing non-wilderness trails.	NCIP provides management direction consistent with current BLM policy, including policy on E-bikes. See Table B-I in Travel and Transportation Management in the Proposed RMP/Final EIS for management direction pertaining to e-bikes.The BLM will follow policy guidance in IM 2023-051 'Management and Use of Electric Bikes on BLM-Managed Lands' and requirements of 43 CFR § 8340.0-5.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	The agency should adequately consider that motorized recreation and dispersed camping opportunities should not be closed by the Agency without site-specific data and analysis as required by NEPA guidance.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. No areas specific to motorized recreation were closed in the Proposed RMP/Final EIS.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - recreation	The agency should adequately consider that there is an inadequate number of dispersed camping spots in the project area. The preferred alternative should address this significant issue.	This was not an issue identified during scoping. Specific camping closures are included in Table B-I of the Recreation and Visitors Use section. Designation of campsites would be undertaken at the implementation level. The vast majority of the planning area on BLM-administered lands is open to dispersed camping.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	15.c Avoid Inadequate Disclosure 1. The agency should adequately disclose both in tabular and map form the miles of existing trails closed to OHV use.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. Specific trail closures are not identified in the NCIP. This will be done during the Travel Management Plan at the implementation planning level following the completion of the NCIP.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	23. The agency should adequately consider alternatives to motorized closures such as public education that would mitigate concerns with the natural environment. 24. The agency's education program should include OHV enthusiasts on the agency's staff and effective outreach to individual motorized recreationists and motorized groups. 25. The agency's education program should include a youth outreach program similar to Kids and Adults on Snowmobiles (KAOS) so that OHV use gets off on the right foot. ( <a href="https://awsc.org/getmedia/22a8a18d-d1ba-4e97-a02e-da6fb92bcc79/Youth-Program-Flyer.pdf">https://awsc.org/getmedia/22a8a18d-d1ba-4e97-a02e-da6fb92bcc79/Youth-Program-Flyer.pdf</a> )	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. These interventions would be considered at that time.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	4. The agency should adequately consider alternatives to motorized closures such as public education that would mitigate concerns with the natural environment.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. These interventions would be considered at that time.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	4. The agency should adequately consider OHV back country discovery routes, OHV byways, and long-distance trails for motorized recreationists so that we have opportunities equal to existing non-motorized opportunities. 5. Many areas are looking for new outdoor recreation opportunities to help diversity their economies and bring tourism dollars to local communities. A Backcountry Discovery Route draws thousands of riders a year into your rural towns looking for food, fuel, lodging and supplies. Backcountry Discovery Routes is dedicated to developing adventure riding opportunities across the U.S., while making a positive economic impact on local businesses along the way. In 2022, BDR surveyed adventure riders to quantify its value in helping smaller communities thrive. In 2022, the total economic impact from all routes was \$60 million from the existing network of routes. BDR riders are supporting local workforces. BDR related visitor spending on BDR routes supports a total of nearly 500 jobs annually. <a href="https://ridebdr.com/news/economicstudy2023/?mc_cid=6a9e59b98d&amp;mc_eid=2fd77d608c">https://ridebdr.com/news/economicstudy2023/?mc_cid=6a9e59b98d&amp;mc_eid=2fd77d608c</a> <a href="https://ridebdr.com/BDR_2023EconomicImpactStudy/files/extfile/DownloadURL.pdf">https://ridebdr.com/BDR_2023EconomicImpactStudy/files/extfile/DownloadURL.pdf</a>	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. Nothing in the NCIP precludes us from developing these types of opportunities. The BLM would continue to work with partners to explore recreation opportunities including increased OHV opportunities as described in Recreation Section D.3.6 and acquiring lands suitable for OHV development as described in the Lands Tenure Section D.3.2.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	Opening dates should be based on weekends, for example open for use on 2nd weekend in May. Closing dates should be based on a weekday, for example, closed for use on 2nd Monday in October.	The only seasonal closure dates identified in the NCIP are based on the biology of sensitive species.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	The agency should adequately consider alternatives to wholesale motorized closures that would mitigate fish and wildlife concerns should be given a hard look.	The plan is not considering any wholesale closure of existing routes.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	The agency should adequately consider providing pullouts for passing oncoming OHVs on 50" wide trails located in long narrow sidehill areas that do not have adequate safe places for passing and/or where reasonable consideration should be given to designating trails with inadequate passing as one-way trails.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. These design features would be considered at that time.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	The agency should adequately develop site-specific Need Factors for each route and the decision establishing the amount of non-motorized versus motorized opportunity should be informed and reliable.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. These design features would be considered at that time.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	The agency should carefully follow the policy of providing equal access to recreation opportunities and resources for people who might otherwise be excluded or marginalized including those disadvantaged in the NEPA process, those who have physical disabilities and members of underserved motorized sectors.	The BLM's commitment to provide opportunities for different user groups can be found under Table B-I, Recreation and Visitor Services, Goals and Objectives.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Alternatives - travel management	We ask that proposed action include proper recognition of the original agreements behind the travel management rule decisions which allow continued use of the existing networks of motorized roads and trails without massive motorized closures.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	15. The agency should adequately consider all of the requirements of the Equity Action Plan with respect to motorized recreationists. 16. <a href="https://www.whitehouse.gov/equity/#:~:text=Equity%20Action%20Plans%20were%20required,and%20partnership%20with%20all%20communities">https://www.whitehouse.gov/equity/#:~:text=Equity%20Action%20Plans%20were%20required,and%20partnership%20with%20all%20communities</a>	The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-I, Row 352) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	In order to adequately evaluate the cumulative effect of all route closures, the agency should adequately consider all mapping that displayed roads and trails in use by the public going back to the 1800's including agency maps and aerials, RS 2477 maps, GLO maps, County Maps, Benchmark, Delorme, and USGS 15" and 7.5" quadrangles. Use equivalent to <a href="https://forestservicemuseum.org/wp-content/uploads/2019/11/Mapping-the-National-Forests-Nov19.pdf">https://forestservicemuseum.org/wp-content/uploads/2019/11/Mapping-the-National-Forests-Nov19.pdf</a>	The BLM is using the best available information for this planning effort. Route closures will be implemented on a site-specific level, subject to agency discretion, and travel would continue on existing routes until actual route designation occurs. In areas designated as open or limited for OHV use, the BLM would monitor and identify thresholds for evaluating potential resource impacts and use BMPs and/or closures to limit those impacts. Additional analysis of Forest Service Road closures and mapping that displays roads and trails in use by the public going back to the 1800's, including agency maps and aerials, would not contribute meaningfully to the analysis in the Proposed RMP/Final EIS.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	Paleo trends must be adequately considered such as found in the paper 1200 years of Upper Missouri River streamflow reconstructed from tree rings at <a href="https://www.sciencedirect.com/science/article/pii/S0277379119306985">https://www.sciencedirect.com/science/article/pii/S0277379119306985</a>	A review of 1,200 years of streamflow on the Upper Missouri River is not necessary to prepare the RMP/EIS. A thorough description of current conditions for each resource is included in the Affected Environment section. This description captures past activities that have resulted in the current conditions. The level of detail included in the Affected Environment includes only what is necessary to address the actions that are analyzed in the analysis of environmental consequences.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	The agency needs to adequately consider the effects of the earth core slowing down, reversing and the 70-year cycle on climate change. <a href="https://www.sciencetimes.com/articles/41996/20230123/earths-inner-core-reversing-direction-slowing-down.htm">https://www.sciencetimes.com/articles/41996/20230123/earths-inner-core-reversing-direction-slowing-down.htm</a>	Comment noted. The Environmental Protection Agency (EPA), Intergovernmental Panel on Climate Change (IPCC), and other authorities will continue to update studies, regulations and guidance with the current air and climate change information for which management in the planning area would analyze and comply. Therefore, the provided source will not be addressed currently.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	The agency should adequately consider how changes in the output of the sun including the current hyperactive solar cycle and the earth's change magnetic field produce a significant amount of climate change that is not CO2 based. <a href="https://www.cnn.com/2022/02/09/why-solar-geomagnetic-storms-destroy-satellites-like-spacex-starlink.html">https://www.cnn.com/2022/02/09/why-solar-geomagnetic-storms-destroy-satellites-like-spacex-starlink.html</a>	Comment noted. The Environmental Protection Agency (EPA), Intergovernmental Panel on Climate Change (IPCC), and other authorities will continue to update studies, regulations and guidance with the current air and climate change information for which management in the planning area would analyze and comply. Therefore, the provided source will not be addressed currently.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	The agency should adequately consider that mental health needs for youth is at extremely high levels, continues to rise, and needs to be addressed with healthy activities. <a href="https://helenair.com/news/state-and-regional/montana-youth-mental-health-needs-on-the-rise/article_c9ad3613-68b8-591d-91fc-5dae86b9b364.html">https://helenair.com/news/state-and-regional/montana-youth-mental-health-needs-on-the-rise/article_c9ad3613-68b8-591d-91fc-5dae86b9b364.html</a>	The BLM recognizes the value and benefits that the natural resources under the Agency's jurisdiction can provide to all individuals who visit those resources for any number of different activities and purposes. The BLM manages natural resources for the benefit of present and future generations of Americans and individuals or third-party organizations that wish to use these resources for the benefit of youth or other groups are welcome to make use of those resources to the extent allowed by Agency guidelines and regulations.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	The agency should adequately consider the economic loss associated with the loss of motorized access and motorized recreation as demonstrated in the following report <a href="https://extension.usu.edu/apec/files/OHVeconomicimpacts.pdf">https://extension.usu.edu/apec/files/OHVeconomicimpacts.pdf</a>	As shown in Table B-1, OHV recreation opportunities would be preserved under all alternatives. The Travel and Transportation Management section notes that under all alternatives, the BLM would maintain 190 acres as open to OHV use in the Samoa Dunes SRMA. Travel routes and OHV use within the Samoa Dunes SRMA would continue along the same patterns and trends as currently occurring. Furthermore, the recreation section analysis states that under Alternative B, although there would be fewer opportunities, the vast majority of opportunity would continue to exist, in some cases with improved trails and management that could improve quality for OHV users. Therefore, the BLM anticipates that OHV use is not being significantly restricted under any alternatives. The ability to perform quantitative analysis on economic impacts from these management changes, including use of the travel cost methods, is limited by the lack of identified changes to the level and type of recreation visitation use.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Best available science and information	The agency should adequately consider the significant amount of data on cumulative Forest Service Road closures that the Montana Environmental Quality Council assembled for the 2015 House Joint Resolution 13 study. <a href="https://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Committee-Topics/hj-13/hj13-finalreport.pdf">https://leg.mt.gov/content/Committees/Interim/2015-2016/EQC/Committee-Topics/hj-13/hj13-finalreport.pdf</a>	OHV use is not being significantly restricted under any alternative. The ability to perform quantitative analysis on economic impacts from these management changes, including use of the travel cost methods, is limited by the lack of identified changes to the level and type of recreation visitation use.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Consistency with other plans, laws, and regulations	2. The Supreme Court released a decision in West Virginia vs. EPA ( <a href="https://www.supremecourt.gov/opinions/21pdf/20-1530_n758.pdf">https://www.supremecourt.gov/opinions/21pdf/20-1530_n758.pdf</a> ), that established when federal agencies are exceeding their regulatory powers. This decision should result in opportunities for examination of existing regulatory powers for federal agencies. For example, if Congress hasn't given explicit authorization to create Subpart C travel management rules to regulate OHV and snowmobiling recreation, then the agency may not have the regulatory authority to create these rules.	The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. Furthermore, this is not a travel management plan. Route designations, closures, or restrictions of routes for OHV or snowmobile use would be determined during the Travel Management Planning process at the implementation level following completion of the NCIP.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Consistency with other plans, laws, and regulations	In April 2022 the Department of Interior released its Equity Action Plan which addresses the lack of access on public lands. Recreation, primarily motorized recreation, has taken a backseat to conservation and protection. Motorized recreation is often the only way those with mobility impairment disabilities are able to access public lands. BLM should ensure that the plan complies with the Department of Interior's Equity Action Plan, which recognizes that restrictions on motorized access to public land create barriers of access to those with disabilities.	The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-1) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan. The Land Tenure section of the Proposed RMP/Final EIS (starting on Row 139 of Table B-1) contains goals, objectives, and management direction where the BLM will look for opportunities to improve public access, which could also support motorized public access.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Consultation and Coordination	12. Provide Adequate Coordination with Local and State Government 1. The agency should adequately consider coordination with all surrounding counties is required and should be adequately provided.	Cooperating agencies; those federal, state, and local agencies and Tribes that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative, pursuant to 40 CFR 1051.8, were consulted through the National Environmental Policy Act (NEPA) process. In January and February 2021, the BLM sent letters to 68 local, state, federal, and Tribal representatives, inviting them to participate as cooperating agencies. A total of 25 entities agreed to participate as a cooperating agency.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Consultation and Coordination	The agency should team with the Post Wildfire OHV Recovery Alliance (PWORA). PWORA is a national non-profit organization founded to protect and restore sustainable OHV recreation from the devastating effects of intense wildfires and other natural disasters. <a href="http://pwora.org/">http://pwora.org/</a>	The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. NEPA and the associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process. The BLM is open to opportunities to collaborate with partners and will continue to meet with interested agencies and organizations throughout the planning process, as appropriate.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Effects analysis approach/methodology	The agency should adequately consider, evaluate, and disclose those trends to the public including the significant cumulative impacts of closure and reduced use on the health of the public land and the health of the public including the significant need for motorized access and recreation. a.The health of the human environment must be given a hard look. b.Nothing in NEPA and CEQ guidance says that the health of the natural environment should prevail over the health of the human environment. c.The health of the human environment must be given consideration equal to the natural environment. d.The agency should adequately consider that it has created significant cumulative impacts on the human environment by closing an excessive amount of multiple-use land to motorized access and motorized recreation. e.The agency should adequately consider that motorized recreationists have been hammered by motorized closure after motorized closure in California and surrounding states.	Under the National Environmental Policy Act (NEPA), "environment" is defined as the natural and physical environment and the relationship of people with that environment. Also, human environment means comprehensively the natural and physical environment and the relationship of present and future generations of Americans with that environment. For the alternatives considered, evaluation of the direct, indirect, and cumulative impacts on the land, water, air, structures, living organisms, environmental values at the site or sites, and the social, cultural, and economic aspects of each alternative was conducted.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Environmental justice	15.Adequately Consider NEPA and Environmental Justice Issues 1.The agency should adequately listen to the needs of all of the public and act on those needs on an equal basis. 2.The agency should adequately consider justice for the closure of motorized recreational opportunities that were made without adequate and credible scientific data and analyses and/or without adequate comparison to natural impacts and change.	Additional information has been added to Section D.5.2 of the EIS to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Outreach/education	The agency should find ways to adequately involve motorized recreationists in the planning and decision processes.	The BLM has made a diligent effort to involve the public in the National Environmental Policy Act (NEPA) process and carried out public involvement-related activities in accordance with guidance for implementing public involvement under NEPA, codified in 40 CFR 1506.6.A detailed description of public involvement, including the public scoping process, is provided in Section 4.3 of the RMP/EIS.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Public health and safety	4.d Public Safety 1.The agency should adequately consider public safety by forcing camping, picnicking, and other motorized access activities in close proximity to well-traveled roads. 2.The agency should adequately consider public safety by squeezing motorized activities into limited miles of roads and trails.	Different OHV usage limits and associated impacts were evaluated for each of the alternatives considered.The BLM does not intend to limit recreation activities in close proximity to well-traveled routes.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Purpose and need	1. Motorized recreation represents and supports many different visitor interests. Supporting motorized recreation is the best way to support diversity of uses and multiple-use.This over-arching fact should be adequately addressed in the purpose and need and adequately considered in the analysis and decision.	The Purpose and Need sections note several factors affecting the daily management decisions of the FO and that generate justification for revising the preliminary RMPs, including changes and increases in recreational use.The BLM also believes that the EIS and range of alternatives analyzed was reasonable for NEPA. Recreation use and access is less restrictive in Alternative C; the Proposed RMP includes acres for OHV open and limited designations. Further,Alternative C proposed acres within SRMAs and ERMA's that provide unique opportunities for recreation based on public input, current conditions and opportunities, and potential for resource impact.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Purpose and need	Motorized recreationists need trail opportunities similar the abundant hiking and mountain bike trail systems.The purpose and need process circumvented identifying and addressing this critical issue.	The Purpose and Need sections note several factors affecting the daily management decisions of the FO and that generate justification for revising the preliminary RMPs, including changes and increases in recreational use. BLM believes that the EIS and range of alternatives analyzed was reasonable for NEPA. Recreation use and access is less restrictive in Alternative C; the Proposed RMP includes acres for OHV open and limited designations. Further,Alternative C proposed acres within SRMAs and ERMA's that provide unique opportunities for recreation based on public input, current conditions and opportunities, and potential for resource impact.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	13.The agency should adequately consider that significant cumulative effects have occurred because motorized recreationists cannot successfully change or challenge the Agency's predisposition to motorized closures. 14.The agency should adequately consider that motorized closures since 1985 meet the NEPA and CEQ test for significance with respect to cumulative effects and cumulative effects should be adequately considered in the analysis. 15.The agency should adequately consider that a sense of magnitude should be used to identify the significant cumulative impact that motorized recreationists have experienced over the past 40 years.	Description about past and present motorized closures has been added to Appendix C, Table C-I, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider and mitigate the significant negative cumulative effect of all motorized closures on the public.	See table in Travel and Transportation Management Appendix D, Section D.3.7 for a comparison of designation criteria and OHV areas. The BLM used a data set of known preliminary routes to quantify impacts for the EIS. The analysis in Travel and Transportation Management Section D.3.7 showed that the Proposed RMP/Final EIS would not close any of these preliminary routes. Future implementation level travel planning will establish a more definitive inventory of routes.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider and mitigate the significant negative cumulative effect of all motorized closures on the youth, disabled, elderly, and veterans.	See table in Travel and Transportation Management Appendix D, Section D.3.7 for a comparison of designation criteria and OHV areas. The BLM used a data set of known preliminary routes to quantify impacts for the EIS. The analysis in Travel and Transportation Management Section D.3.7 showed that the Proposed RMP/Final EIS would not close any of these preliminary routes. Future implementation level travel planning will establish a more definitive inventory of routes.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider how the continual conversion (cumulative effects) of multiple-use land to defacto wilderness land impacts the public including a cumulative effects analysis of all of the motorized opportunities available prior to BLM and USFS planning guidance and rules established in the 2000's compared to the reduced level available today and with the proposed action.	A description about increased and decreased recreation from wilderness and motorized closures has been added to cumulative impacts.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider only site-specific data and analysis that demonstrates that adequately demonstrates a significant impact from camping and dispersed camping opportunities on the natural environment.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. Planning level analyses do not rely on only site-specific data. No change made.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider that all of the defacto motorized closures that have resulted from vegetation and timber projects, erosion and flood damage, blockage from beetle kill downfall, and obliteration of the trail tread and downfall from wildfires have a significant impact on the public's opportunity to enjoy motorized access and motorized recreation. a. The cumulative effect of this continual loss has become significant and should be addressed and mitigated.	A description about increased and decreased recreation from motorized closures has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider that the analysis should adequately disclose and evaluate the amount of motorized access and motorized recreation that has been lost to public use since the 1960's.	A description about past and present motorized closures has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider that the cumulative effect of this action combined with many other similar motorized closure decisions significantly affects our pursuit of happiness and the quality of the human environment.	A description about past and present motorized closures has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider that the public has effectively lost the use of a significant number of trails and routes each year due to inadequate maintenance including vegetation and timber projects, erosion and flood damage, blockage from beetle kill downfall, and obliteration of the trail tread and downfall from wildfires. a. The cumulative effect of this continual loss has become significant and should be addressed and mitigated.	A description about past and present trail/route loss has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should adequately consider the significant impact of motorized closures on other public lands including those managed by the Bureau of Land Management because they are similar in significant cumulative impact to the motorized closures enacted by the Forest Service and estimated to be about 1/3 of routes available to the public in 1990.	A description about past and present motorized closures has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should carefully consider that the current trend of massive, motorized closures has minimized OHV opportunities to the extent that many remaining OHV destinations look like over-crowded refugee camps.	A description about past and present motorized closures has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Recreation	The agency should provide full and adequate disclosure of the cumulative effects of all motorized closures on the public so that the decision does not marginalize motorized recreational opportunities.	A description about past and present motorized closures has been added to Appendix C, Table C-1, Recreation and Visitor Use. This section addresses past, present, and reasonably foreseeable future actions considered in the cumulative effects analysis.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Social and economic conditions	The agency should adequately consider the economic loss associated with the loss of motorized access and motorized recreation as demonstrated in the following report <a href="https://extension.usu.edu/apec/files/OHVeconomicimpacts.pdf">https://extension.usu.edu/apec/files/OHVeconomicimpacts.pdf</a>	As shown in Table B-I, OHV recreation opportunities would be preserved under all alternatives. The Travel and Transportation Management section notes that under all alternatives, the BLM would maintain 190 acres as open to OHV use in the Samoa Dunes SRMA. Travel routes and OHV use within the Samoa Dunes SRMA would continue along the same patterns and trends as currently occurring. Furthermore, the recreation section analysis states that under Alternative B, although there would be fewer opportunities, the vast majority of opportunity would continue to exist, in some cases with improved trails and management that could improve quality for OHV users. Therefore, the BLM anticipates that OHV use is not being significantly restricted under any alternative. The ability to perform quantitative analysis on economic impacts from these management changes, including use of the travel cost methods, is limited by the lack of identified changes to the level and type of recreation visitation use.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Travel Management	I. Prior to the BLM Travel Management Rule, motorized recreationists had a reasonable opportunity to enjoy motorized access, motorized roads, and motorized trails. Now with nearly 20 years under the travel management rule motorized recreationists are subject to motorized closure upon motorized closure and the cumulative impact associated with those closures has become significant yet ignored by the agency. a. Motorized recreationists did not expect the travel management rule to be a massive closure action and accepted it on that basis. b. Motorized recreationists did not expect the travel management rule to be a massive closure action, but the agency has chosen to implement the travel management rule that way. c. Motorized recreationists did not expect the travel management rule to be a massive closure actions, but the agency has chosen to implement the travel management rule that way. d. The travel management rule were not adequately evaluated and disclosed to the public as massive, motorized closure actions. e. This implementation and the ultimate significant end impact of the travel management rule on the public was not adequately identified, was not adequately evaluated, was not adequately disclosed, and was not adequately mitigated. f. The agency's implementation of the travel management rule must be corrected to address these deficiencies starting with the Northwest California Integrated Resources Management Plan.	Implementation of the BLM Travel Management Rule is not covered under this RMP. In many places in the planning area, off-route travel is difficult due to steep terrain and dense vegetation in areas where off-road travel is not feasible and causes resource damage. Travel would continue on existing routes until actual route designation occurs.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	12. The agency should have their recreation team visit the project area during the weekends and seek out motorized recreationists so that they have site-specific information on needs necessary to adequately evaluate the number of motorized recreationists, types of motorized recreation and visitors accessing the project area. 13. The agency should use adequate site-specific data and evaluations to support more motorized recreational opportunities in the decision-making and record of decision.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	7. For assessment of negative and positive impacts on the human environment, the agency should develop site specific data, evaluations and comparisons by collection and development of site-specific data and evaluations for each route including: a. Interviews with motorized recreations to find out their needs and values for each motorized route, b. Document why motorized recreationists enjoy this route, c. Who is using each road and trail by development of a Need Factor for each route. i. The Need Factor should be based on category of user (non-motorized or motorized), observed number of users during a reasonable monitoring period, and divided by the total number of users. ii. For example, 90 motorized visitors and 10 non-motorized users observed over 4 weekends equals a Need Factor of 0.90 for motorized users and 0.10 for non-motorized users. iii. Route availability should then be based on these Need Factors. d. Is this motorized route part of a network or destination? e. Research to document the history of the route including historic wheeled use and historic pioneer and mining use. f. Quality of the route, g. Alternatives that would allow sharing of the route, h. Document who is working to maintain the route, i. Site-specific data for each of the claimed negative impacts from motorized access and motorized recreation on the natural environment, j. Site-specific data and analysis of e-bike recreation, k. The agency should adequately consider that motorized recreation and camping opportunities should not be closed without site-specific data and analysis as required by NEPA, and CEQ guidance, and l. benefits to the human environment including flow by use of the route.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	One significant issue to address right up front is the development of detailed site-specific data and analysis by 4x4 and OHV enthusiasts. These team members should be experienced using a wide spectrum of motorized routes so that the value and need for an adequate quantity and variety of motorized routes is adequately documented. The analysis and documents should include easily interpretable maps with adequate detail so that the public can easily understand what areas and routes are being evaluated and comment on them. Maps should include all existing motorized roads and trails including motorized singletrack trails. Maps should be developed and evaluated with input from 4x4 and OHV enthusiasts.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	For assessment of negative and positive impacts on the natural environment, the agency should develop site specific data, evaluations and comparisons by: a. Collection and development of site-specific data including monitoring for each route, b. Development of site-specific positive and negative impact evaluations for each route, c. For both positive and negative impacts on the natural environment, the test of significance should be made using a comparison to the natural level of impacts occurring on each route. d. The agency should adequately consider that impacts on fish and wildlife should not be assumed based on beliefs and impact analyses should be based on adequate site-specific data and studies and then verified. e. The agency should adequately only consider site-specific data when evaluating motorized and camping opportunities. f. The agency should adequately consider that the road density impact criteria are not site-specific and, consequently, not valid for the project area. g. The agency should adequately consider the need for site-specific data and the value for decision-making as demonstrated by 6 years of monitoring in Yellowstone National Park which demonstrated little impact to wildlife from snowmobiles.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	The agency should adequately consider that the analysis and decision-making for claimed impacts should be based on an adequate sense of magnitude which can only be established by comparing impacts based on site-specific data and scientific analysis to natural levels.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	The agency should adequately consider the value of motorized recreation opportunities on the human environment using site-specific data and analysis addressing social and economic values and impacts; the need for recreation and healthy activities; the need to experience "flow" and nirvana; the need to exercise our culture; and the need to address obesity and suicide issues, and the need to address physical and mental health needs. NEPA 1969 was intended to protect and promote all environments equally. The depth and breadth of site-specific data and analysis of the human environment should be equal to that of the natural environment so that the true cause and effect is adequately considered.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	The agency should adequately monitor evaluations and decisions so that they are not made based on beliefs and are made on site-specific data and analysis and then verified.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. BLM would complete travel management planning according to relevant policies.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Use of site-specific data/methodology	The agency should revisit any motorized closures that were enacted without adequate site-specific data and analysis.	This comment is beyond the scope of the RMP/EIS. Designations of specific routes and associated site-specific analysis would be done at the implementation level during travel management planning following the completion of the NCIP. No areas specific to motorized recreation were closed in the Proposed RMP/Final EIS. Closures or restrictions of routes would be determined during the Travel Management Planning process at the implementation level following the completion of the NCIP.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Wildlife	8. The agency should adequately consider that; a. Topography is a significant factor affecting wildlife habitat. b. The vertical topography in the project area greatly reduces the impact on wildlife and is just as effective as or more effective than cover. c. The analysis should reasonably consider topography.	This comment is outside the scope of the RMP/EIS. No change has been made. An analysis of the effects of topography on wildlife would not contribute meaningfully to the EIS.
Action Committee	CTVA	44	Capital Trail Vehicle Association	Wildlife	9. The agency should adequately consider that: a. A motorized trail does not have the same impact on wildlife as a road. b. The impact analysis should not assume that one size of impact fits all motorized uses. c. A criteria and impact analysis should be developed that differentiates between different tread widths and level of use including traffic counts.	This comment is outside the scope of the RMP/EIS. No change has been made. A criteria and impact analysis on tread widths does not meet the purpose and need. The current analysis does not assume that roads and trails have the same impact on wildlife. The impact analysis presents a broad range of potential effects from all types of recreation and linear features.
Alderson	George and Frances	50	N/A	Alternatives - wilderness/wsa/lwc	We ask BLM to ban off-road vehicles from wilderness study areas and Lands with Wilderness Characteristics. BLM should set up a process to review existing ORV routes, identify problem areas, and ban ORVs where they have been damaging fish and wildlife habitat.	The BLM would conduct travel management process at the implementation planning stage as needed. Through this planning process, the BLM identified areas where [OHV] use should be limited or closed to prevent damage to resources.
Artis	Scott	62	Golden State Salmon Association	Alternative D (preferred alternative)	We support Alternative D (Preferred Alternative), which would strike a balance between creating opportunities for resource uses, such as recreation, maintaining ecological function and meeting land capability to protect habitat connectivity. Through this alternative, the draft NCIP recommends wild and scenic protection for 56 suitable river segments totaling 135.3 miles, including the 5.7 miles of Butte Creek. Other important wild and scenic recommendations in the Sacramento River watershed include the Sacramento River near Bend and several tributaries. Additionally, we strongly urge the BLM to include in its recommendation that Battle Creek, Deer Creek and Mill Creek be designated as Wild and Scenic River to extend protections and aid recovery of threatened salmon runs.	Battle Creek is already considered suitable under Alternative D and in the Draft Suitability Report. The BLM recognizes the regional importance of Deer Creek and Mill Creek (particularly for fisheries and recreation); however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable wouldn't meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Augustine	Justin	103	Center For Biological Diversity	Alternatives - forestry	The DEIS states the following with respect to all three Plan alternatives: "Prioritize forest health and fuels treatments around and in ACECs and late-successional forest to protect these areas from fire in cases of insect and disease infestations and outbreaks resulting in declining forest health and tree mortality." This raises some concern because some "forest health and fuels treatments" can cause harm to wildlife habitat. For example, the northern spotted owl ("NSO") relies heavily on intact late-successional forest. NSO research (Lesmeister et al. 2021) notes that "[u]nder most fire weather, suitable [NSO] nesting forests burn at lower severity compared to the surrounding landscape but are at increased risk of burning at high-severity when fragmented and surrounded by non-nesting forests (primarily younger forests) which are most susceptible to loss due to wildfire." Lesmeister et al. 2021 supports a "call for conservation of existing high-quality northern spotted owl nesting forest and, outside those areas, focused treatments to increase the extent of forest types with large diameter trees, high amounts of canopy cover, and decadence components such as broken topped live trees, mistletoe, cavities, large snags, and fallen trees." Similarly, Lesmeister et al. 2019 found that "northern spotted owl habitat can buffer the negative effects of climate change by enhancing biodiversity and resistance to high-severity fires," and "protecting large blocks of old forests could be an integral component of management plans that successfully maintain variability of forests in this mixed-ownership and mixed-severity fire regime landscape." We therefore ask that more specific direction be provided to ensure protection of late-successional forest. See 43 U.S.C. § 1701(a), 1702(a) (Federal Land Policy and Management Act (FLPMA) stating that BLM must manage public lands "in a manner that will protect the quality of the scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values," and must give special protection to areas of critical environmental concern ("ACECs")); see also 43 U.S.C. § 1732(b) (requiring BLM to manage all public lands under its direction to prevent "unnecessary or undue degradation").	The statement is referring to stands that are already declining or in response to a disturbance/mortality event. Management actions in these scenarios would be analyzed at the implementation level to promote forest health and retain Late Successional Reserve (LSR) or ACEC characteristics such as fire resilience and wildlife habitat.
Augustine	Justin	103	Center For Biological Diversity	Alternatives - new special designation nominations	We support the following areas remaining as ACECs: Butte Creek, Deer Creek, Forks of Butte Creek, Hawes Corner, Iaqua Buttes, Sacramento Island, and Swasey Drive. We support the expansion of the following ACECs: Gilham Butte, Sacramento River Bend, Shasta and Klamath Rivers Canyon, and Upper Burney Dry Lake and Baker Cypress. We support the following new ACECs: Beegum Creek Gorge, Black Mountain, Corning Vernal Pools, Eden Valley, Grass Valley Creek, Ma-le'l Dunes, North Fork Eel River, North Table Mountain, Sheep Rock, South Spit, Upper and Lower Clear Creek, Upper Klamath Bench, Upper Mattole, and Willis Ridge. We therefore ask that all be included as ACECs in the Final Plan.	The BLM Interdisciplinary team has taken the recommendations into consideration. The ACECs carried forward in the Proposed RMP/Final EIS are listed in Table B-1 (beginning on Row 250).
Augustine	Justin	103	Center For Biological Diversity	Alternatives - wilderness/wsa/lwc	We support the following areas as LWCs: Cahto Peak, Camp St. Michel, Chappie Shasta, Grass Valley South, Sacramento River Bend, and therefore ask that they be included as such in the Final Plan.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Appendix B, Table B-1 for Lands with Wilderness Characteristics managed as a priority over other use.
Augustine	Justin	103	Center For Biological Diversity	Alternatives - wilderness/wsa/lwc	We support the following areas as WSAs (per Alternative B, DEIS page 2-196): Brushy Mountain/English Ridge, Gilham Butte, Red Mountain, Trinity Alps, and Yolla Bolly. We therefore ask that they be included as WSAs in the Final Plan.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Appendix B, Table B-1.
Best	Jim	100	N/A	Alternatives - lands and realty	BLM should encourage steps that create as much protective buffer as possible ...Wild and Scenic status, encourage acquisition of as much of the 12,000 acres of private lands relevant to the area of protection, limit OHV use to existing roads and trails, prohibit target shooting, establish VRM II status throughout, and in general, manage and protect the 6,640 acres of the Sacramento River Bend Area as Lands with Wilderness Characteristics.	The acquisition criteria are laid out and do encourage acquisition by adjacency as described in Table B-1. Thank you for the comment, the BLM has worked to balance the important conservation and recreation uses of the area with a variety of management direction.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Butler	Sarah	101	N/A	Alternative D (preferred alternative)	Specifically I urge you to consider adopting Alternative B.This alternative is impressive since under Alternative B, management actions that promote habitat connectivity would be given priority consideration. I urge you to protect old growth forests by retaining the Late-Successional Reserves, and to manage the 12,110 acres of the English Ridge, Gilham Butte, Trinity Alps, Red Mountain, and Yolla Bolly as Wilderness Study Areas. I urge you to further improve the final version of the NCIP by protecting all of the wildest BLM parcels in the region in as strict a fashion as possible while allowing existing recreation activities to continue.	The BLM Interdisciplinary team has taken the recommendation into consideration.The Proposed RMP/Final EIS shows the special designations carried forward in Appendix B, Table B-I for Section 202 WSAs.
Cabral	Jesse	78	N/A	Alternatives - travel management	I would like to propose the opening up of the sand dunes along big black sands beach north of Shelter Cove. Opening the beach to 4x4 vehicles and atv's. I remember that beach open to recreational vehicles all the way to Gitchell Creek, it was exciting and well known.That was back in the 90's.The beach water is dangerous to swim so recreational vehicles are perfect for the public.	Black Sands Beach is outside of the planning area (within the King Range NCA).
Cann	Bruce	10	N/A	Alternatives - new special designation nominations	Also on page 2-187 and other pages as well, the management direction of Alternatives B,C, and D are for the most part, not viable. For example, on page 2-187 it states the entire Eel River WSR would be managed as Wild.The lower reaches of the mainstem Eel River are adjacent to Highway 101, and there are many other paved roads, towns and developed communities within the river corridor. How is the BLM going to manage this section as Wild.The answer is that BLM won't and I'm sure BLM has not intention on managing this section as Wild.	As described in Appendix I, the East Branch South Fork Eel River was found not suitable for inclusion in the National System based on the fact that surrounding land uses and management direction is not consistent with management of Outstandingly Remarkable Values (ORVs) and when looking at the larger river system, this segment does not provide a critical link to the systems approach.
Cann	Bruce	10	N/A	Alternatives - new special designation nominations	In Alternative A there is mention of a "CRMP".The acronym table does not include this so I assume it means "Coordinated (Resource or Recreation) Management Plan. Is BLM planning on writing such a plan? If so, for what area or program?	CRMP stands for Comprehensive River Management Plan. Under the Proposed RMP/Final EIS, the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers, however, nothing precludes the BLM from doing so in the future if the opportunity arises.
Cann	Bruce	10	N/A	Alternatives - new special designation nominations	On page 2-187 it states that the management direction of Alternatives B,C, and D is to manage the Eel River WSR as "Wild".The VRM Class would be Class II, which is inconsistent with BLM manuals and policies as Wild sections of WSR's and designated Wilderness Areas are by default classified VRM I. Other management classes are not allowed.	The Proposed RMP/EIS has been revised. Changes to WSR designated Wild VRM classes have been made where appropriate. It should be noted, however, that BLM Handbook 6400,WSRs, does not mandate a VRM classification, nor does the VRM handbook.The Visual Resources Inventory Handbook gives guidance on how to analyze visual impacts for WSR wilds but does not give management recommendations.
Cann	Bruce	10	N/A	Alternatives - new special designation nominations	Regarding the fire suppression program, all WSR's classified Wild should have at least 2 Resource Advisors on sight and on the fire line during all operational periods. Resource Advisors should also be on site during suppression repair activities.The use of bulldozers in Wild sections should only be approved by written authorization of the State Director.	This comment is outside the scope of the RMP/EIS. No change has been made.The use of Resource Advisors is not a lands use planning decision.The Authorized Officer would determine how many Resource Advisors would be needed.
Cann	Bruce	8	N/A	Alternatives - new special designation nominations	Under 2.Alternatives (Tale 2-2: Land Use Plan Decisions by Alternative) my comments are listed below: 1. On page 2-180 it states "Management for National Trails does not vary by alternative." Why not?...there are numerous scenarios that can be identified. For example, one alternative could have a section of trail designated VRM I while another alternative could have a different section of trail designated VRM III. Alternatives regarding camping / day use could be identified.Alternative scenarios for fire fighting access could also be identified, i.e. levels of mechanical use such as bulldozers, chainsaws, etc. OHV alternatives could be identified. How about different levels of maintenance? In summary, having only one alternative is inconsistent with NEPA as a range of reasonable alternatives is required if possible. On page 3 of this document describes 4 general alternatives that are wide-ranging and cover a multitude of management scenarios. There is really no good reason not to have 4 alternatives under the National Trails management program. If there is then BLM needs to explain in detail why there is only one alternative.	The BLM did not receive comments on National Historic Trails (NHTs) during public scoping, and no issues were identified that necessitated a range of alternatives under NEPA requirements.
Cann	Bruce	14	N/A	Alternatives - travel management	I recommend that there be additional management goals and direction regarding regional trail connectivity.There is no mention of the Great Redwood Trail, minimal mention of the Coastal Trail, and no mention of opportunities to connect trails so that a regional network is completed at some point in time.	Information about opportunities to work with partners on regional trail networks has been added to Table B-I, Goals and Objectives under Recreation and Travel and Transportation Management.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cann	Bruce	12	N/A	Alternatives - wildland fire	2. Specifically, I recommend that at least one Alternative include the following: A) During a wildfire, MIST will be utilized for all Wilderness Areas, WSA's, Wild and Scenic River Corridors, and ACEC's; B) BLM local Resource Advisors will be deployed ASAP to all wildfires on BLM land; C) An Archaeologist will be deployed ASAP; D) Appropriate tribal representatives will be contacted ASAP.	The NCIP clearly states that areas in special designation or sensitive to fire suppression will be given consideration or utilize Minimum Impact Suppression Tactics. Tiered Fire Management Plan documents are the most appropriate place to identify suppression tactics, identify resource types to use or avoid, and the required deployment of personnel in mitigation of potential impacts.
Cann	Bruce	12	N/A	Alternatives - wildland fire	3.) Designate "Retardant Avoidance Areas" that includes Wilderness Areas, WSA's, designated W&S River Corridors, and ACEC's where sensitive vegetation, aquatic resources, and cultural values would likely be negatively impacted.	Agencies should avoid aerial application of retardant or foam within 300 feet of waterways and any ground application of wildland fire chemicals into waterways. A waterway is defined as any body of water—including lakes, rivers, streams and ponds—whether or not it contains aquatic life.
Cann	Bruce	12	N/A	Alternatives - wildland fire	Under Wildland Fire Management, located in 2. Alternatives (Table 2-2: Land Use Plan Decisions by Alternative) I have the following comments: 1. Instead of stating "No similar management action" under Alternative A, (because this is simply not the case) I suggest that the BLM develop 4 viable alternatives for each resource program instead of combining Alternatives B, C, and D into one. There are numerous differing management actions not identified in Alternative A. Having only two Alternatives that do not cover a wide range of potentially viable management actions is in conflict with NEPA (as stated in my earlier comments).	A reasonable range of alternatives across resources exist, including Wildfire.
Carlton	Alan	142	N/A	Alternatives - general alternative comments	The plan should be revised to provide maximum protection for all undeveloped lands, including recommending wilderness protection and not allowing logging or mining on other near wilderness lands	The Proposed RMP/Final EIS provides protections for Wilderness, Section 202 WSAs, and Lands with Wilderness Characteristics managed as a priority over other uses, as shown in Table B-1.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Additionally, "Authorized officers," consulting with Tribes to include TEK into decision making should at least require one Indigenous officer. Mistrust in the federal government is a barrier in tribal engagement practices, having a Native person in the room making those connections and decisions has a greater impact. Tribal people communicate easier with trust when communicating with fellow Indigenous people. This requirement would guarantee that there will be someone who understands Tribal concerns, practices, and politics without having to wait for them to get trained or caught up on that information.	The BLM will continue partnerships and collaboration in adherence to Secretarial Order 3403, BLM Handbook 1780, and other laws and policies as applicable.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	A need for water resources, including water quality, and groundwater to be considered by the BLM with respect to proposed management of forested areas	The Proposed RMP/Final EIS addresses water quality and groundwater with respect to forestry practices through a variety of actions, described in both the Water Quality and Riparian Management Area section.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Coordination of fisheries management with Tribes to identify strategic land for future acquisition by BLM to protect anadromous fish habitat	This is covered under the Goals and Objectives of Table B-1, Tribal Interests (Row 355) and Land Tenure (Row 140).
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Coordination with Tribes regarding fuels reduction and/or cultural burn projects to restore, enhance, and promote ecosystem health to sustain and improve the quality of culturally utilized plants that are covered under the CA BLM/US Forest Service Region 5 Interagency Traditional Gathering Policy	This is addressed in Management Common to All Action Alternatives, Tribal Interests, Row 357. This is also addressed in the Fire Section.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Co-stewardship agreements and repatriation of sacred sites, gathering areas, cultural resources, and places with cultural significance to Tribes	Included in Management Common to All Action Alternatives, Tribal Interests, in two separate bulleted points.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Education and interpretation of salmon heritage sites in coordination with Tribal partners	This is covered in the Proposed RMP/Final EIS under the Cultural Resources Section, Goals and Objectives.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Incorporation of cultural burning and Indigenous knowledge/traditional ecological knowledge (TEK) to facilitate movement toward desired vegetation conditions	This is covered in the plan under the Tribal Interests and Fire Sections.
Chichizola	Regina	69	Save California's Salmon	Alternatives - general alternative comments	Meaningfully include both federally and non-federally recognized Tribes in land, water, and coastal resource management decisions, including but not limited to opportunities for co-management, early, often, and meaningful consultation, and hiring Indigenous staff to develop trust and establish deeper connections	Meaningfully including Tribes is covered in the plan under Tribal Interests: Fulfilling Trust Responsibility, EO 13175, etc. Hiring practice is outside the scope of the RMP but see EO 13985.
Chichizola	Regina	69	Save California's Salmon	Alternatives - forestry	Include annual, cultural burning, and land management practices to preserve healthy ancient forests in the LSRs from invasive species, which are creating excessive fire fuels and depleting the water sources. This includes excessive young conifers.	The Forestry section includes specific direction for late-successional reserves to protect them.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Chichizola	Regina	69	Save California's Salmon	Alternatives - new special designation nominations	New regulations regarding conservation and landscape health, must include Tribes. Examples include deciding which land should be chosen for Areas of Critical Environmental Concern (ACEC) Restoration Prioritization I, and wilderness study areas; giving Tribes priority or right of first refusal over conservation leases; requiring states and local governments to consult with Tribes in meaningful ways if they are to receive conservation leases; assessing for ACEC co-stewardship opportunities; and engaging in communication even when it is assumed that there is no substantial direct effect on Tribes.	The Proposed RMP/Final EIS identifies multiple instances where Tribes will be engaged with management actions, listed in Table B-1.
Chichizola	Regina	69	Save California's Salmon	Alternatives - wilderness/wsa/lwc	Clearly state in the NCIP Record of Decision that Wilderness Study Area (WSA) designation and Lands with Wilderness Characteristics (LWCs) management is consistent with and would not limit traditional tribal cultural resources, practices, traditions, and uses	The Proposed RMP/Final EIS addresses Tribal cultural resources, practices, tradition, and uses in lands with wilderness characteristics in Section D.5.3. The BLM would not limit any access for Tribal cultural uses. "Facilitate Tribal access to lands with wilderness characteristics with traditional Tribal values and use."
Chichizola	Regina	69	Save California's Salmon	Tribal consultation and coordination	In consideration of the FO to comply with legislative mandates, and executive orders, we ask you to honor the federal Indian trust responsibility, a legal obligation of the federal government to protect tribal treaty rights, lands, assets, resources and the duty to carry out the mandates of federal law with respect to tribes. (I. Seminole Nation v. United States, 316 U.S. 286 (1942); "What is the federal Indian trust responsibility?", US Dept. of Interior, Indian Affairs (2017). <a href="https://www.bia.gov/faqs/what-federal-indian-trust-responsibility">https://www.bia.gov/faqs/what-federal-indian-trust-responsibility</a> ) We also encourage honoring Secretarial Order Number 3335 (2. Reaffirmation of the Federal Trust Responsibility to Federally Recognized Indian Tribes and Individual Indian Beneficiaries," Department of the Interior, 2014. <a href="https://www.doi.gov/sites/doi.gov/files/migrated/news/pressreleases/upload/Signed-SO-3335.pdf">https://www.doi.gov/sites/doi.gov/files/migrated/news/pressreleases/upload/Signed-SO-3335.pdf</a> ), Joint Secretarial Order Number 3403, Amendment No. 1 (3 Joint SO 3403 (doi.gov) <a href="https://www.doi.gov/sites/doi.gov/files/elips/documents/joint-so-3403-a1_0.pdf">https://www.doi.gov/sites/doi.gov/files/elips/documents/joint-so-3403-a1_0.pdf</a> ), in fulfilling the Trust Responsibility to Indian Tribes and in the Stewardship of Federal Lands and Waters. The Secretarial Order was issued by the Secretary of Agriculture, the Secretary of the Interior and the Secretary of Commerce to ensure that the Department of Agriculture, the Department of the Interior, and the Department of Commerce and their component Bureaus and Offices are managing Federal lands and waters in a manner that seeks to protect the treaty, religious, subsistence, and cultural interests of federally recognized Indian Tribes consistent with the nation-to-nation relationship between the United States and federally recognized Indian Tribes; and, that such management fulfills the United States' unique trust obligation to federally recognized Indian Tribes and their citizens.	The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. NEPA and the associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process. This is to develop a reasonable range of alternatives to the proposed actions and to prepare environmental documents that disclose the potential impacts of proposed actions and alternatives.
Crellin	Justin	111	N/A	Alternatives - lands and realty	Concerning other recent BLM acquisitions in NW CA that are not included or referenced in the DEIS, specifically the tract in northern Mendocino County known as Lost Coast Redwoods, I urge BLM to conduct an assessment of these newly acquired lands under NCIP and manage them to keep mature trees and to regrow the ancient forests of the future. I also request the same for BLM's new acquisition south of Guthrie Creek in the Lost Coast Headlands - and encourage managing this parcel in a manner consistent with that of the larger Lost Coast Headlands holdings that it is adjacent to. These are exciting and valuable additions to the public lands of NW CA - and I wholeheartedly support BLM continuing to increase its holdings in these areas and across all lands and waterways referenced in the NCIP DEIS. I'd also suggest this be done in a manner that seeks input, but does not require official approval from, local government entities.	Acquired lands would be managed similarly to adjacent BLM-administered lands unless the BLM determines specific management needs unique to those acquired lands. Management direction for these properties will come from the 'coastal strip' management direction (see Coastal Resources Management). All forest lands in the NCIP will be managed to protect late-seral characteristics. Implementation -level planning for acquisitions would be completed after lands are acquired. The public will have the opportunity to participate in this separate planning effort.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Crellin	Justin	III	N/A	Alternatives - new special designation nominations	With regard to WSRs in the Lost Coast region, I encourage BLM to move all Mattole River segments and tributaries listed in Alt B to the preferred alternative. These tributaries include segments of Grindstone Creek, Sholes Creek, Eubank Creek, NF Fourmile Creek, and Fourmile Creek, totaling 14.7 miles, 2.7 of which flow through BLM land. In addition to the outstanding scenic and/or wild characteristics of these streams, they also provide outstandingly remarkable anadromous fish value and are crucial in supporting healthy flows in the Mattole River. Though WSR designation is strongly encouraged - especially considering statewide interest in conserving the Mattole River watershed - BLM, at a minimum, should retain eligibility of the Mattole segments and its tributaries to maintain interim protection of the fish values.	The BLM recognizes the regional importance of the Mattole River and its tributaries as mentioned in the Gilham Butte ACEC and Upper Mattole ACEC, Table B-1. Additionally, the BLM has determined current federal and state laws provide protection to this area and protect the ORVs.
Crellin	Justin	III	N/A	Alternatives - new special designation nominations	The outstanding natural resources of this holding include abundant old growth forest (including outside of the existing LSR) and prime conditions for northern spotted owl, marbled murrelet, and other threatened species that depend on old growth forest habitat. Gilham Butte is also an important wildlife corridor, essentially connecting Humboldt Redwoods State Park and Bull Creek State Wilderness to the north and King Range National Conservation Area/King Range Wilderness to the west and south. With regard to Humboldt Redwoods State Park, Gilham Butte's 5840 LWC-appropriate acres directly border state park property, providing incredible potential for public recreational access via an expansive trail system that exists in Humboldt Redwoods State Park. Various conservation acquisitions and easements in this area over recent decades comprise what is known as the Redwoods To The Sea Corridor; a statewide-identified Essential Corridor of High Biological Value. Backpackers and trail enthusiasts have long dreamed of making a Redwoods To The Sea Trail through this corridor a reality. A trail system like this would be an outstanding recreational asset, connecting the largest tract of contiguous old growth redwoods anywhere in the world to the longest stretch of coastal wilderness in the lower 48 states - with the wild lands of Gilham Butte in between. Not only would this visionary project allow public access to Gilham Butte, it also has the potential to be a major economic driver, drawing tourists to an otherwise depressed economic region that is increasingly looking to public lands and outdoor recreation for economic sustainability. Because of this potential, and the larger wilderness characteristics present at Gilham Butte, not only would WSA designation be appropriate for the 5840 LWC-recommended acres, but an upgraded VRM to no less than level 2 should also be adopted for the entirety of the Gilham Butte holdings to protect its outstanding scenic qualities. I'd also recommend that continued acquisitions occur in the vicinity of Gilham Butte, both to further the above stated connectivity in the Redwoods To The Sea Corridor and with lands to the east, which feature ultramafic/serpentine outcrops and a variety of rare or endemic plant communities.	Some ACECs vary in VRM class responding to their respective Relevant and Important (R&I) values. An R&I value for Scenic Quality would have a more conservative VRM class. VRM classes within ACECs may also vary based on other special designations that may overlap the ACEC boundary. For the proposed Gilham Butte ACEC of 9,330 acres it is a VRM Class III. However, 5,840 acres is proposed as VRM Class II because those lands are also lands with wilderness characteristics managed to protect wilderness as a priority, which are to be managed as VRM Class II. Therefore, 5,840 acres of Gilham Butte ACEC would be managed as VRM II, while the remainder of the proposed expanded ACEC, would be managed as VRM Class III. The Proposed RMP/Final EIS identifies Section 202 WSA and how they will be managed as described in Table B-1.
Crellin	Justin	III	N/A	Alternatives - wilderness/wsa/lwc	With regard to the larger DEIS document, I encourage BLM to adopt the highest level of wilderness management prescription for all NCIP LWCs that meet the criteria for 202 WSAs and don't have conflicting recreation uses - i.e. Brushy Mountain/English Ridge, Gilham Butte, and Yolla Bolly/Middle Eel from Alt B, plus those already included in the preferred alternative. Additionally, I recommend that Eden Valley be included in the preferred alternative as a WSA. Despite the existing LWC acreage of the Eden Creek portion of this holding falling just shy of the 5000 acre minimum threshold for wilderness, in consideration that the recent and adjacent Elk Creek acquisition would increase acreage to surpass the minimum threshold, not to mention the adjacent Yuki Wilderness on USFS land, the portion of Eden Valley proposed as Wilderness in HR 3700/S. 1776 should be recommended for WSA designation in the preferred alternative, pending an LWC assessment of the Elk Creek acquisition.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 for Section 202 WSAs. The two Eden Valley units (north and south) are bisected by a road and therefore it does not meet lands with wilderness characteristics size requirement. Eden Valley does not meet the criteria to be designated as having lands with wilderness characteristics. If it does meet size requirement due to acquisition then it would be re-inventoried.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Crellin	Justin	111	N/A	Alternatives - wildlife	I also support the designation of the South Spit ACEC, which could vary in size between 630 and 888 acres depending on how the shoreline varies over the years of this RMP. This 4.5 mile long spit is critical to the continued existence and recovery of beach layia, Menzie's wallflower, and western snowy plover. South Spit is comprised of four California Sensitive Plant Communities that are vulnerable to critically imperiled, such as northern foredune grassland, active coastal dunes, northern coastal salt marsh, and brackish coastal marsh. With active management, these native and rare communities can be recovered where invasive, non-native species have affected community composition and the natural processes that sustain them. I recommend providing the 888-acre number to its management and adjusting as needed over the life of the RMP.	The area is owned by CDFW and managed by BLM under cooperative management agreements to protect conservation and recreation access values for which it was acquired. While the BLM is not authorized to designate an ACEC unless the BLM owns the property in fee, upon any portion of future acquisition in the proposed action area shown in Appendix G, ACEC Report, South Spit Figure 32, the NCIP RMP would then confer designation of ACEC without further planning. Until such time, the BLM would continue to manage to protect the R&I values identified for the proposed ACEC.
Cullars	Justin	82	N/A	Alternatives - lands and realty	The BLM should acquire private lands from willing sellers to increase public ownership and resource protection in the Wild and Scenic River corridor and ACEC.	BLM acquisition criteria can be found in Table B-I. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).
Cullars	Justin	82	N/A	Alternatives - new special designation nominations	I support continued management of the Deer Creek corridor as an ACEC to protect its important biological and cultural values. ACEC boundaries should be those shown on the BLM's 2017 Surface Management Map.	The existing ACEC designated in the 1993 Redding RMP were drawn to include private lands. Early on the BLM decided to only include lands that the BLM could apply special management to protect the R&I values. The 1993 and Draft NCIP plan included the same BLM lands.
Cunningham	Laura	123	Western Watersheds Project	Air quality and climate change	<p>The DEIS says: Livestock grazing actions are generally projected to result in localized air quality impacts, including windborne particulates from exposed soils as vegetation is removed by livestock (fugitive dust emissions) and methane as a byproduct from the animals. These air quality impacts would depend on the level of grazing (amount of bare soils subject to wind erosion) and the number of animals grazed and associated methane emissions. The more land reserved for grazing may result in an incremental beneficial effect on air quality, however, this would be dependent on the number of animals grazed per acre and potential alternate land uses. Common management actions such as control of land utilization levels, erosion control, and livestock grazing standards would generally have a beneficial impact on air quality, because they promote grazing practices that aim to reduce fugitive dust emissions and promote soil and vegetation health for carbon sequestration. Because annual vegetation production, actual use levels by livestock, and patterns of distribution of livestock vary, the impacts on air quality, fugitive dust, and methane emissions would be speculative; however, there are no appreciable differences in the areas open to grazing among the alternatives, so their impacts are expected to be similar, although are discussed under each alternative. (3-25)</p> <p>We agree with this analysis but disagree that methane emissions and dust levels are speculative- these can be quantitatively measured depending on livestock type and stocking levels, and with simple particulate air quality measuring devices.</p>	Given the variables associated with livestock emissions, the analysis remains qualitative. Monitoring and quantitative emissions would require more detailed and variable information than possible for the planning area (annual vegetation production, actual use levels by livestock, varying patterns of distribution of livestock, wind conditions, exposed soil, etc.). These air quality impacts would depend on the level of grazing (the amount of bare soils subject to wind erosion) and the number of animals grazed and associated methane emissions, as discussed in Section D.2.1.
Cunningham	Laura	123	Western Watersheds Project	Alternative A (no action)	We are also concerned that some specific and detailed management directions in the Arcata Resource Management Plan (RMP) of 1992 and the Redding Resource Management Plan of 1993 are reduced to more general and vague management directions in the proposed Alternatives in the NCIP DEIS. Some examples include details in these older RMPs of the inclusion of the Yokayo Grazing Management Record of Decision, improvement of chinook salmon spawning areas in the lower Shasta River, closing the Upper Klamath River to livestock grazing, improving Dry Creek spawning habitat for steelhead trout, and Shasta Valley wetland enhancement, using grazing as a management tool, and integrated resource planning.	Thank you for your comment. The EIS contains more information pertaining to the Yokayo Grazing Management Record of Decision than the 1992 Arcata RMP. This can be found in Table B-I, which describes management direction pertaining to livestock grazing. Improvements of Chinook salmon spawning areas in the Lower Shasta River and Shasta Valley wetland enhancement are also described under Management Direction in Table B-I, under the heading Riparian Management Area Management Actions. The Upper Klamath River and Dry Creek are closed to livestock grazing. Management and maintenance for the purpose of restoring functional riparian systems would not necessarily entail incorporation of existing strategies from the Arcata RMP and Redding RMP.
Cunningham	Laura	123	Western Watersheds Project	Alternatives - climate	Although we generally support this management direction, BLM should clarify what below-ground carbon sequestration by soil amendments means exactly. The best carbon sequestration we know of is to allow native deep-rooted perennial bunchgrasses and biological soil crusts to stabilize and build organic soils over decades without grazing or dumping of livestock manure or fertilizers.	Soil amendments can increase plant growth, and thus root growth, which increase carbon sequestration. Woodchips and biochar have shown promising results with increasing soil fertility and may be considered on a case-by-case basis with project level planning.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - fish and aquatic species	We approve of the BLM carrying forward the Aaquatic Conservation Strategy from the Northwest Forest Plan. The DEIS says that in the action alternatives, the concept of riparian management areas has been carried forward, but configurations and widths have been modified (at 2-26), and we request that these modifications be detailed and mapped in the Final EIS.	Riparian Management Areas are described in the RMP/FEIS. Mapping is not feasible at this scale.  See Map 2-1 and Map 2-2 for a planning wide look of riparian management areas. We recognize that these maps are hard to apply on the ground, so riparian management areas have been applied on the ground by definition. We have included an illustration of the definitions (a diagram depicting the buffers) to help clarify. This is now Figure D-4 in the revised document.
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - fish and aquatic species	We generally support Alternative B and D with respect to riparian area management, but we would like clarification on how fuels would be reduced: The location, extent, and management of riparian management areas would be based on the type and hydroperiod of the aquatic resource. This would increase the amount of riparian management areas compared with Alternative A. Basing management on the ecological and hydrological characteristics of the area would facilitate movement toward desired conditions. Designing and implementing watershed restoration projects to promote long-term ecological integrity, using site-appropriate native species, removing invasive, nonnative plants, and reducing fuels would lower the risk of catastrophic fire and improve resilience to future climate-related disturbances like fire and drought. (2-205)	Revisions have been made to clarify management direction in the RMP/EIS. Direction for Riparian Management Areas (Table B-1) has been updated to include revised management direction which provides more detail on what is allowed to occur.
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - fish and aquatic species	We support fully removing all livestock from streams, riverbanks, springs, and wetlands, as mentioned in the DEIS under impacts of grazing: Grazing can compact soils, remove vegetation, erode stream banks, and add nutrients (livestock manure) to water bodies. This would degrade habitat and degrade water quality for aquatic species by increasing water temperature through the reduction of riparian shade vegetation, increasing erosion and water turbidity, and potentially causing algae blooms and subsequent reduction in dissolved oxygen. Current BLM guidelines aim to minimize these impacts by, among several guidelines, restricting the time and seasonality of livestock grazing in riparian areas, and placing salt blocks and supplemental feed away from riparian areas. These impacts could be further reduced by requiring that livestock be excluded from streams and sensitive waterbodies and requiring a no-grazing buffer around these areas. (DEIS at 3-162) Fencing buffer zones should depend on slope, soil, and watershed characters.	This comment is beyond the scope of the RMP/EIS. Specific authorizations associated with grazing allotments will be reviewed at the implementation level following the completion of the NCIP. Fencelines are either historically maintained at their current locations, or after Rangeland Health Assessments point to livestock impacts, analyzed in site-specific NEPA to be moved or adjusted based on water quality objectives within each allotment. The Riparian Management Areas section directs BLM to address impacts to riparian areas by livestock grazing.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	123	Western Watersheds Project	Alternatives - livestock grazing	<p>4. North Coast Range allotments in Alternative A: See PDF for map.</p> <p>1. North Coast Range allotments in Alternative D: See PDF for map.</p> <p>BLM lands are opened up to livestock grazing in Alternative D in the North Coast Range of Mendocino County, in areas around Potter Valley, Willits, and Laytonville in areas we know well from camping and exploring for many decades. These areas hold valley grasslands, Douglas fir forests, coast redwood groves, and diverse oak and shrub communities. Again, BLM needs to analyze the impacts of opening up lands that are currently unavailable for livestock grazing and give the public the reasons for proposing to graze these areas. Therefore, we do not fully support Alternative D until we can understand the BLM's rationale for proposing to open up currently ungrazed public lands to livestock grazing.</p>	<p>This is primarily due to the Covelo Vicinity Area that was previously closed to livestock grazing now considered in the preferred Alternative D as open. The BLM has a multiple use mission. In accordance with FLPMA 1976, Sec. 102 (a)(11), "the public lands shall be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber and fiber from public lands." And, (c), "The term "multiple use" means the management of public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services [...] a combination of balanced and diverse resource use that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values, [...]" This means that the BLM evaluates the multiple resource benefits available for use while considering the long-term sustainability of such resources. This includes range, which is a consideration for this RMP. These lands identified in the original Arcata RMP 1996 were designated 'closed' without rationale. Any individual allotments that could be created would be on a case-by-case basis and would need to follow criteria that identify it as suitable for grazing. The areas that are now open in Alternative D would go through additional analysis to determine if the desired area is suitable to sustain a livestock operation, then an allotment could be established. Determination of site suitability includes an assessment of resources including vegetation, cultural resources, wildlife, sensitive species, and other site-specific factors. Such determinations would go through an additional appropriate decision-making process.</p>
Cunningham	Laura	123	Western Watersheds Project	Alternatives - livestock grazing	<p>The BLM is currently managing 27 active livestock grazing allotments within the planning area, as well as 33 vacant allotments with no current permit or lease associated with them. Additionally, five of the vacant grazing allotments have pending applications. Regardless, all livestock grazing use must meet the standards set forth in Rangeland Health Standards and Guidelines for California and Northwestern Nevada Final EIS (BLM 1998b) to ensure that range condition and productivity are stable. .... Currently, four allotments have a completed AMP. We recommend that BLM complete Allotment Management Plans for the remaining 23 active allotments. As interested public citizens we insist.</p>	<p>43 U.S.C 1752 (e)- states, " In all cases where the Secretary concerned has not completed an allotment management plan or determines that an allotment management plan is not necessary for livestock operations and will not be prepared, they shall incorporate in grazing permits or leases such terms and conditions as [he or she] deems appropriate for management of the permitted or leases lands pursuant to applicable law." This means that it is up to the Authorized Officer if or when an allotment management plan is necessary. Within the Field offices of this plan, some allotments have active AMPs but all others incorporate the measures necessary for successful, sustainable livestock management on Public Lands and therefore do not need to complete an AMP for all remaining allotments.</p>
Cunningham	Laura	123	Western Watersheds Project	Alternatives - livestock grazing	<p>The DEIS at 3-92 says: Livestock may contribute to nonnative, invasive plant establishment and spread. Ungulates can promote seed dispersal via dung, fur, and hoofs (Collins and Uno 1985; DiTomaso 2000). Grazing may increase the available sites for colonization by creating openings in the grassland canopy and reducing the accumulation of litter.</p> <p>BLM needs to analyze the impacts of proposed targeted grazing to sensitive resources, and include the public in any proposed targeted grazing plans. Targeted grazing is mentioned in the DEIS with no discussion of where and how targeted grazing would be implemented: Biological treatment methods to move vegetation towards desired condition would typically include livestock grazing. Targeted grazing would primarily be used to reduce fuels from invasive annual and nonnative perennial grasses. Grazing can also increase soil compaction and bare ground, and contribute to nonnative, invasive plant seed dispersal. (3-84) Targeted grazing does not remove woody vegetation such as shrubs and trees at a level that would reduce fire fuels, and thus is not a preferred option to deal with wildlands fire management.</p>	<p>The BLM plans to utilize a suite of vegetation treatments to promote and maintain biodiversity across the landscape, each dependent on-site specific details that would shape which tools BLM would use. Options for vegetation treatment include targeted grazing, which is generally paired with flash grazing techniques to target a specific stand of vegetation for a short duration of time. Targeted grazing most commonly uses goats as a method to reduce undesirable vegetation which includes non-native invasive species and woody vegetation prominent in vigorous resprouting species such as tanoak as well as shrubs and firs encroaching in prairies in the absence of fire. Where it is appropriate and feasible, with consideration to sensitive resources such as rare plants in implementation level decisions. In response to this comment, BLM plans to further detail the uses and impacts of targeted grazing as a tool for vegetation management which tiers to the Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report (PER; USDI BLM 2007b).</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - livestock grazing	<p>The DEIS describes the potential impacts of opening up habitats to livestock grazing and we agree with these negative impacts: Livestock grazing would alter the quality of wildlife habitat by causing changes in the vegetation structure and cover. Effects include loss of vegetation cover, which may increase susceptibility to predation; the loss of forage and prey base, which may lead to starvation, malnutrition, or habitat displacement; and habitat degradation through the introduction of noxious weeds and invasive, nonnative plants, which may lead to a reduction in native vegetation (Gross 2013). This would reduce preferred native plants used for food and the cover that native vegetation provides. There is also the potential for increased competition with some wildlife species for forage, and potentially reduced cover and nesting habitat for other species. Further, wildlife may be displaced from their habitats, which could increase competition for resources in adjacent habitats, affecting survival or reproductive success for some individuals. Species adapted to open habitats may experience increased habitat availability from grazing that reduces vegetation cover, whereas species that require denser cover may see a decrease in habitat (Schieltz and Rubenstein 2016; Dettenmaier et al. 2017). (3-134)</p> <p>BLM says: "Under all alternatives, the BLM's management of livestock grazing would ensure that leases comply with the Rangeland Health Standards and Guidelines for California and Northwestern Nevada Final EIS (April 1998), which includes Proposed Grazing Management Practices for Water Quality in California. This would reduce the level of effects to wildlife and habitat because standards for rangeland health and water quality, and, therefore, wildlife habitat conditions, would be maintained." (3-134) This may require updating, and we encourage the use of ESDs to gradually replace this management and monitoring protocol.</p>	<p>Ecological Site Descriptions (ESDs) are used in Rangeland Health Assessments to aim for site-specific standards across the state. Unfortunately, NRCS has yet to release published ESD's for the whole state, so more times than not, the BLM is working off provisional ESD's that are not yet published. The BLM has been working with the NRCS to develop ESDs. ESDs are not a monitoring protocol nor a management strategy, they are a tool used to assist the identification of the site's potential versus the actual site that is being evaluated. No change is necessary.</p>
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - livestock grazing	<p>We do not support widespread vegetation treatments in forests and chaparral, which can negatively impact wildlife habitat. The chart below, DEIS at 3-134, shows that Alternatives B and D would open up large areas of wildlife habitats that are currently closed to livestock grazing (Alternative A, current management) to grazing. Increasing mule deer and elk habitat to cattle and sheep grazing could lead to increased negative interactions with any dispersing wolf populations, which can rely on deer and elk as a prey base. This needs analysis. Therefore, we support Alternative A levels of closed habitat to grazing. See PDF for Table 3-33</p>	<p>The BLM would coordinate with CDFW and USFWS if any conflicts arise within grazing allotments. Conflicts would be addressed at the implementation level.</p>
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - livestock grazing	<p>We generally agree with these best management practices but recommend fencing out livestock permanently from water bodies in order to reduce soil erosion and non-point source water pollution.</p>	<p>This was considered, but being a multiuse agency, the BLM cannot make a planning level decision this large in favor of a single resource. Water quality is often analyzed on a case-by-case basis at implementation level, rather than planning. The BLM also analyzes impacts to water quality in Appendix D, discussing adding range improvements such as troughs away from water sources and drawing livestock away from more sensitive areas.</p>
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - new special designation nominations	<p>BLM proposes management to include that Trail corridor infrastructure would not be allowed to detract from the heritage values, except where features are already in place. Future changes to existing infrastructure in the trail corridors would not be allowed to detract from the trail values. (2-215) We agree with this, and suggest a 5-mile visual buffer to preclude any new transmission or energy infrastructure intruding on the trail values.</p>	<p>The portions of the trails located on BLM-managed lands have been inventoried. The 150-foot buffer is adequate for trail's protection given its location in scattered public lands in an urban setting and along a still used fire egress road.</p>
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - new special designation nominations	<p>BLM should detail the need for cattle trailing across the Yreka Trail Route of the California National Historic Trail and how this should be handled as a regular trailing permit and not mandated in to an RMP which seems to favor a particular private individual lessee in this planning process above others: The trail corridor would be managed to allow cattle trailing as part of the heritage value of the trail. This could cause impacts on the trail's integrity from surface disturbances associated with this activity. (3-429)</p>	<p>Protection of Sheep Rock as an ACEC has appropriately addressed these values in major sections of trail on BLM lands. Trailing has been permitted for over 150 years through County ordinance on sections of trail. BLM access is provided to an isolated parcel by a lessee through private lands on the cattle trail. A trail management plan in coordination with the NPS could result in a fenced corridor on an approximate trail location in one section already heavily impacted and studied where a grazing lease exists.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	We also recommend surveys and monitoring of native grass species and native grassland communities, especially deep-rooted native perennial grasses that may be present. We have observed native cool-season perennial bunchgrasses such as purple needlegrass ( <i>Stipa pulchra</i> ), blue wildrye ( <i>Elymus glaucus</i> ), and mountain brome ( <i>Bromus marginatus</i> ), as well as native cool-season rhizomatous grasses such as creeping wildrye ( <i>Elymus triticoides</i> ) in ungrazed and less-grazed grasslands to greatly contribute to soil stability. These native grassland vegetation relicts should be protected from excessive grazing, included in rangeland health assessments, and monitored for trend. Utilization should be no more than 80% and seedheads should not be allowed to be grazed off so that populations can continue to reproduce. In our observations the vast majority of rangelands in the NCIP area are California annual grasslands composed of introduced Eurasian annual grasses with shallow roots and much less capability to hold soils together during grazing, trampling, disturbance, and wind and rain erosion.	The maintenance, enhancement, and restoration of native perennial grassland communities has been selected as the preferred alternative in the vegetation section. Livestock grazing in this vegetation community type would adhere to the rangeland health standards and guidelines and promote grassland conservation on public lands as detailed in the preferred alternative for Livestock Grazing. Within the Vegetation section, monitoring protocols such as AIM are included, which capture point in time measurements of vegetation within a study plot. This monitoring method would include detailed species level identification as well as collecting frequency and density data for species encountered within the plot. If these grasses that are identified within the comment are present, they would be captured in the protocol. BLM is currently expanding the AIM program to the Northwest California. Additionally, through Interpreting Indicators of Rangeland Health (IIRH) as part of the AIM protocol, uses established ESDs to evaluate conditions of vegetation within a site.
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	BLM would use a combination of Assessment Inventory and Monitoring (AIM) methods, Rangeland Health Evaluations (RHE). And legacy methods currently implemented by BLM for long term monitoring projects. State and transition models from approved Ecological Site Descriptions (ESDs) and REAs could be used (if or when available) in addition to best available data to evaluate potential changes in vegetation communities, as necessary. Using the most up to date science and data available, management changes would be implemented to best address the vegetation trends. Accordingly, the management actions associated with each vegetation cover type described in the matrix below would adhere to that vegetation type as it shifts in location and extent due to disturbance, climate change or other factors. BLM could use these monitoring methods, and state and transition models from approved ESDs and REAs to identify and manage refugia to provide for natural resource resiliency to climate change impacts, as necessary. (2-37) We have been investigating reference sites for grassland communities in California and would be willing to work with BLM to help develop these for ESDs.	The BLM is open to opportunities to collaborate with partners on the development of ESDs in Northern California to support our Rangeland Health Assessments to ensure we are meeting Rangeland Health Standards and Guidelines.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	<p>Coastal prairies In northern California, coastal prairies are limited to bluff and marine terrace areas in a relatively narrow, discontinuous band along the Pacific coast. These communities are adapted to salt-laden air from sea spray, and salt-accumulating soils. Coastal prairie also occurs in areas below about 3,000 feet further inland (rarely more than about 62 miles), but under maritime influence (Kie 1988; Reynier et al. 2019c; Sims et al. 2019b). Plant communities vary widely within the region depending on microclimate, soil, topography, disturbance history, and historical and contemporary land use. Habitats are often dominated by perennial grass species, such as California oatgrass (<i>Danthonia californica</i>), Pacific hairgrass (<i>Deschampsia cespitosa</i>), sweet vernalgrass (<i>Anthoxanthum odoratum</i>), Kentucky bluegrass (<i>Poa pratensis</i>), and forbs like goldfields (<i>Lasthenia</i> sp.) and western bracken fern (<i>Pteridium aquilinum</i>). Coastal prairie communities often intergrade with scrub, woodland, and forest types to form a mosaic across marine terraces. Before Euro-American settlement, regular burning of coastal prairies by Tribal communities was common. Burning prevented woody species encroachment, converted shrublands to grasslands, maintained and increased herbaceous plant productivity by reducing competition, and maintained hunting grounds by increasing forage for ungulates (Reynier et al. 2019c). Recurrent wildland fire likely maintained grasslands by limiting shrub encroachment, and also limited tree encroachment in coastal scrub stands (Sims et al. 2019b).</p> <p>Coastal prairies provide habitat for many wildlife species, including large herbivores like: Roosevelt elk (<i>Cervus elaphus roosevelti</i>) and black-tailed deer (<i>Odocoileus hemionus</i>), foraging habitat for numerous raptor species like red-tailed hawk (<i>Buteo jamaicensis</i>), American kestrel (<i>Falco sparverius</i>), and northern harrier (<i>Circus hudsonius</i>), nesting and foraging habitat for migratory bird species, and habitat for common reptiles and small mammals (Kie 1988). (See Section 3.2.5, Wildlife, for more information.)</p> <p>Coastal prairies are sensitive to water availability. Changes in precipitation and soil moisture are likely to alter species composition and distribution. In some coastal prairie grasslands, bluff erosion resulting from sea level rise will eliminate habitat. Coastal prairies are susceptible to woody vegetation encroachment in the absence of periodic disturbances such as wildland fire, which can slow tree encroachment into herbaceous prairies and increase vegetation productivity in burned areas (Reynier et al. 2019c). (3-64)</p> <p>This is a good summary of coastal prairies in northern California, and we would like to add an emphasis in managing and increasing native perennial grasses such as California oatgrass (<i>Danthonia californica</i>), Pacific hairgrass (<i>Deschampsia cespitosa</i>), and Idaho fescue (<i>Festuca idahoensis</i>). California oatgrass can tolerate light to medium intensity livestock grazing, Pacific hairgrass can tolerate light grazing, but Idaho fescue is usually quickly eliminated with even livestock grazing. Therefore, this species may occur in only relict stands, and there could be opportunities to survey for it and increase stands. A program of prescribed fire in a patch mosaic of every 5-10 years would allow shrubs like coyote brush to continue to mix in with coastal prairie grasses, providing nesting habitat for birds such as white-crowned sparrow (<i>Zonotrichia leucophrys</i>), and cover for brush rabbits (<i>Sylvilagus bachmani</i>).</p>	<p>Within the Vegetation section, monitoring protocols such as AIM are included, which capture point in time measurements of vegetation within a study plot. This monitoring method would include detailed species level identification as well as collecting frequency and density data for species encountered within the plot. If these grasses that are identified within the comment are present, they would be captured in the protocol. The BLM is currently expanding the AIM program to the Northwest California which would allow for more monitoring points within the coast that would ideally pick up these relic stands. Additionally, through Interpreting Indicators of Rangeland Health (IIRH) as part of the AIM protocol, uses established ESDs to evaluate conditions of vegetation within a site. If or when these relic stands of these identified grasses are found, the BLM could use these stands as a seed source to propagate and use for restoration within the appropriate regions. BLM Arcata is currently doing this through partner organizations to bolster these populations within prairies on the North Coast.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	Grazing can eliminate these native grasses, even light grazing and with low utilization rates. BLM should survey for native grassland relict communities and conserve these areas from all livestock grazing.	The maintenance, enhancement, and restoration of native perennial grassland communities has been selected as the preferred alternative in the vegetation section. Livestock grazing in this vegetation community type would adhere to the rangeland health standards and guidelines and promote grassland conservation on public lands as detailed in the preferred alternative for Livestock Grazing. Within the Vegetation section, monitoring protocols such as AIM are included, which capture point in time measurements of vegetation within a study plot. This monitoring method would include detailed species level identification as well as collecting frequency and density data for species encountered within the plot. If these grasses that are identified within the comment are present, they would be captured in the protocol. The BLM is currently expanding the AIM program to the Northwest California. Additionally, through Interpreting Indicators of Rangeland Health (IIRH) as part of the AIM protocol, uses established ESDs to evaluate conditions of vegetation within a site. If or when these relict stands of these identified grasses are found, the BLM could use these stands as a seed source to propagate and use for restoration within the appropriate regions. BLM Arcata is currently doing this through partner organizations to bolster these populations within prairies on the North Coast. Grazing would not be excluded from these areas if it is within an active allotment, however if these stands persist in rangelands, the BLM anticipates they are not within the normal territory that cattle graze, likely protected by natural features such as steep terrain or isolated pockets surrounded by undesirable vegetation. See Table B-1, Livestock Grazing.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	<p>Juniper and Sage Juniper habitats are characterized as woodlands of open to dense aggregations of junipers in the form of shrubs or small trees. Western juniper (<i>Juniperus occidentalis</i>) occurs primarily on the Modoc Plateau and Great Basin of northeastern California, and mountain juniper (<i>Juniperus communis</i>) is found in the higher elevations of the Sierra Nevada and Yolla Bolly Mountains of northern California. California juniper (<i>Juniperus californica</i>) stands are located in the interior coast ranges of northern and central California and the Sierra Nevada foothills in the planning area and are also distributed in southern California. Juniper stands are on valley bottoms, slopes, alluvial fans, steep and rocky escarpments, on various, but often shallow soils. Young junipers are fire-sensitive and find refuge from wildfire on rocky sites (Laudenslayer, Jr. 1988). Sagebrush habitat is found in the east and northeast portions of California, on dry slopes and flats from about 1,600 to 10,500 feet in elevation (Neal 1988).</p> <p>Juniper habitats are woodlands of open to dense aggregations of junipers (particularly western juniper and mountain juniper in the planning area) in the form of shrubs or small trees. Stands can be small clumps to widely scattered single plants. Associated tree and shrub species, depending in part on species of juniper and its distribution, include white fir (<i>Abies concolor</i>), Jeffrey (<i>Pinus jeffreyi</i>) and ponderosa pine, curl leaf mountain-mahogany, antelope bitterbrush (<i>Purshia tridentata</i>), and big sagebrush (<i>Artemisia tridentata</i>). In denser stands, there is usually a grassy understory, but in open stands, a shrub understory is usually present (Laudenslayer, Jr. 1988). Often in the planning area, the shrub understory is dominated by big sagebrush. Sagebrush stands are often mixed with other species of shrubs of similar form and growth habit, like: rabbitbrush (<i>Ericameria</i> spp. or <i>Chrysothamnus</i> spp.), horsebrush (<i>Tetradymia</i> spp.), gooseberry (<i>Ribes</i> spp.), curl leaf mountain mahogany, and antelope bitterbrush. In undisturbed sites with more moisture, sagebrush stands have an understory of perennial grasses and forbs. After disturbance and during years with excess moisture, annual grasses such as cheatgrass (<i>Bromus tectorum</i>) and medusahead invade sagebrush stands (Neal 1988).</p> <p>Juniper and sage habitats are important for wildlife (see Section 3.2.5, Wildlife). Juniper berries are an important food source for wintering birds and the foliage is eaten by several mammals and they may be an important food source for some of these animals, especially during harsh winters (Laudenslayer, Jr. 1988). Sagebrush is also a major winter-range type for migratory mule deer, and principal habitat for pronghorn (<i>Antilocapra americana</i>). Sagebrush is a year-round habitat for many small mammals, migratory birds, and raptors (Neal 1988).</p> <p>BLM should also include native perennial grasses in its management of Juniper-sage vegetation communities, and adjust livestock grazing towards light or no grazing management. We have found complex and diverse native grass components in juniper-sagebrush communities, with a few examples including Thurber's needlegrass (<i>Stipa thurberiana</i>), needle-and-thread (<i>S. comata</i>), Sandberg bluegrass (<i>Poa secunda</i>), squirreltail (<i>Elymus elymoides</i>), bluebunch wheatgrass (<i>Agropyron spicatum</i>), and many others. Native meadow communities may include such species as tufted hairgrass (<i>Deschampsia cespitosa</i>) and sedges (<i>Carex</i> spp.), which can be significantly impacted by grazing.</p>	The preferred alternative for Juniper and Sagebrush ecosystems in the vegetation section directs the BLM to manage for diverse sagebrush steppe with a native perennial grass understory. Rangeland Health Assessments and routine annual monitoring for forage will direct further management actions on livestock grazing practices to conserve perennial grass communities. See Table B-1, Row 39 (Vegetation).

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	<p>Oak Savannas and Open Woodlands These are oak-dominated habitats of blue oak, valley oak, interior live oak, and Oregon white oak, both in savanna settings (scattered trees with less than 25 percent canopy cover) and open woodlands (between 25 and 50 percent canopy cover) (Hilberg et al. 2019d).</p> <p>Oak savannas and woodlands are extensive within the interior Coast Range and Sacramento Valley, often with foothill pine as a co-dominant species (see Foothill Pine and Oak Woodland above). Blue oak savannas and woodlands are the most widespread types, and they are generally found on warmer, drier sites. Interior live oak is most common in the southern Klamath Mountains and Coast Ranges, and it is often associated with blue oak woodlands and chaparral. Valley oak woodlands occur in riparian areas and floodplains with deep alluvial soils, primarily in the Sacramento Valley and Coast Ranges. Oregon white oak habitats are scattered throughout the coastal forest zone, along river corridors, and within lower montane forests in the Klamath region (Hilberg et al. 2019d).</p> <p>Oak savannas and open woodlands are highly valued by Northern California Tribes for acorn harvest and other traditional uses (see Section 3.5.3, Tribal Interests).</p> <p>Contemporary oak savannas and open woodlands have existed since the last glacial period, and their structure and distribution has been enhanced and maintained by routine cultural burning, a process that creates and maintains habitat for a diverse suite of plant and wildlife species and habitats (Hilberg et al. 2019d).</p> <p>Oak savannas and woodlands are primarily sensitive to climate stressors that reduce water availability, including changes in precipitation amount and timing, reduced soil moisture, and increased drought. Reduced moisture availability reduces acorn germination and seedling and sapling survival, ultimately determining oak recruitment rates and distribution on the landscape. Water stress also reduces tree vigor, enhancing vulnerability to disturbances. Oaks are well-adapted to low- and moderate-intensity wildland fires, which maintain the open settings of savannas and open woodlands by limiting encroaching shrub and conifer species (Engber et al. 2011, Perry et al. 2011).</p> <p>However, changes in the frequency and intensity of wildfires may increase rates of tree mortality, preventing successful oak sapling recruitment and subsequent acorn production and potentially leading to the conversion of oak woodlands to chaparral and grasslands. (3-71-72)</p> <p>We would add that the native grassland component in oak savanna communities should also be managed for, including a careful analysis of any proposals to open up areas for livestock grazing. Our work in northern California in Blue oak savannas has found a substantial native grass component, with some species favoring the shade of oak canopies, and other species preferring the sunlit open areas.</p>	Prior to the issuance to a new livestock grazing authorization site specific NEPA analysis would be completed to analyze for any potential impacts to botanical resources, including remnant stands of native grasses. See Table B-1, Row 39 (Vegetation).
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - vegetation	<p>We agree with some limited removal of conifers in coastal prairie to maintain or increase the extent of this community, and that prescribed fire, native plantings, and soil amendments would improve the structure and function. BLM should also compare how prescribed fire plots could gradually eliminate conifers in coastal prairies without mechanical removal. (2-205)</p>	The use of fire and mechanical removal methods have been analyzed within the scientific community. Both have pros and cons that are considered when BLM decides to use each tool. The efficacy of each method is based off many factors such as environmental effects, funding availability, seasonal timing of work, availability of fire crews and so on. Each option is then evaluated to identify the best tool for land managers to utilize in managing woody vegetation on public lands. It would be a consideration for BLM to conduct site specific study plots, however, that would also be on project level basis and not within the RMP.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - water resources	<p>BLM presents a rather vague statement on how grazing management may be continued, and we would like more details of how rangeland health evaluations will contribute to protection of riparian areas: Trends in livestock grazing would depend on a number of environmental factors; however, the BLM would continue to administer rangeland health evaluations to ensure protection of riparian areas and water resources under changes to range management. (3-59)</p> <p>The Goals and Objectives proposed for Alternatives B, C, and D are good, and many if not all of these can be directly related to grazing, and this should be better analyzed with respect to rivers, watersheds, streams, springs, and wetlands:</p> <ul style="list-style-type: none"><li>-Protect and increase water to riparian areas by reducing vegetative water intake and using best management practices to reduce sedimentation into stream channels.</li><li>-Conserve, recover, enhance, and restore aquatic and riparian areas.</li><li>-Contribute to the conservation and recovery of ESA-listed fish species and their habitats and provide for conservation of BLM Special Status fish and other BLM Special Status riparian- associated species.</li><li>-Maintain and restore natural channel dynamics and processes, and the proper functioning condition of riparian areas, stream channels, floodplains, and wetlands by providing forest shade, sediment filtering, wood recruitment, stability of stream banks and channels, water storage and release, vegetation diversity, nutrient cycling, and cool and moist microclimates.</li><li>-Maintain water quality and streamflows within the range of natural variability, to protect aquatic biodiversity, provide quality water for contact recreation and drinking water sources.</li><li>-Meet water quality criteria identified in regional Water Quality Control Plans (Basin Plans).</li><li>-Maintain high quality water and contribute to the restoration of degraded water quality for 303(d)-listed streams.</li><li>-Reduce summer water temperatures in watersheds where they exceed or are close to exceeding known thresholds to maintain cold water biota. (2-26)</li></ul> <p>Yet the management Direction for these same Alternatives vaguely says: Adhere to the standards and guidelines for rangeland health to protect riparian resources. (2-27)</p> <p>More detail of management should be provided in the Final EIS.</p>	Revisions have been made to the analysis in the RMP/EIS. The analysis of grazing impacts on water resources has been updated in Section D.2.3.
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - wildlife	<p>Gray wolf habitat is included as being present in the planning area (DEIS at 3-122 and 3-124). Yet we found no analysis of how wolf habitat would be managed, and no analysis of how any wolf encounters with domestic livestock would be avoided or mitigated. This needs analysis in the Final EIS. The only management for wolves we found in the entire DEIS was in chapter 3 under BMPs in Appendix D-8: D.2.7 Migration/Movement Corridors</p> <ul style="list-style-type: none"><li>-Identify wildlife migration and movement corridors that cross BLM lands.</li><li>-Manage areas to protect migration and movement routes for mule deer and other wide-ranging wildlife, and especially keystone species such as wolves, cougars, and other carnivores. This includes identification and mitigation of barriers such as highways, canals, fencing, and man- made dams.</li><li>-Prevent habitat loss and fragmentation within the corridor. Use existing conservation programs to enhance habitat in identified corridors.</li><li>-Where corridors cross jurisdictional boundaries, coordinate management of the corridor with all relevant agencies, governments, landowners, and other entities.</li><li>-Consider identified corridors during management planning processes.</li></ul> <p>BLM should manage these habitats for reduced fencing, and removal of livestock in areas identified as high-use or denning sites for wolves.</p>	The BLM will protect active gray wolf den and rendezvous sites from human disturbance during the critical breeding period. Site specific details will be used to develop appropriate buffer distances and work periods for individual projects implemented under the RMP.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Alternatives - wildlife	<p>We support the DEIS in the following analyses, and we want to see any proposed opening of closed lands to grazing better analyzed in the Final EIS: Wildlife species associated with riparian habitat types could be affected the most by livestock overgrazing because livestock disproportionately use these areas for forage, water, and shade. Excessive grazing can alter streambank stability, channel structure, and riparian composition, leading to reduced stream functionality, water quality, and habitat function (Belsky et al. 1999; Forest Service 2015). Additionally, grazing can cause injury or mortality of some aquatic-dependent species, such as amphibians, due to trampling individuals and eggs. Migratory birds would also experience habitat loss or degradation from livestock overgrazing in riparian areas, which many migrating birds use as stopovers on their migration routes. Reduced vegetation and its diversity, altered vegetation, and reduced habitat connectivity would limit the availability of nesting areas, forage, and cover for many bird species. (3-135)</p> <p>Livestock overgrazing can affect upland habitat if it reduces herbaceous plant cover and density, decreases plant litter, and alters the plant species composition and structure of riparian habitats. These changes would reduce forage or prey availability, cover, and breeding habitat for some species. Areas surrounded by livestock watering facilities would be devoid of vegetation and would not provide habitat for wildlife, while forage around livestock watering facilities would be reduced. Also of concern is direct competition between native ungulates and cattle for browse and forbs, particularly during droughts (Ockenfels et al. 1991). Deer may avoid sites with high cattle utilization (Collins and Urness 1983), and reproductive success may be lower in areas with high cattle stocking rates (Smith 1984). (3-133-135)</p>	<p>The effects described are considered to be effects of overgrazing and are analyzed in Section D.3.8 with discussion/analysis of effects of opening closed lands to grazing. Grazing would be managed in accordance with rangeland health standards as described in Table B-1, Livestock Grazing. Analysis for opening new allotments would be done on a case-by-case basis taking aspects discussed in the comment into account.</p>
Cunningham	Laura	I23	Western Watersheds Project	Best available science and information	<p>Incorporating Interpreting Indicators of Rangeland Health(I) could go a long way in analyzing and monitoring soil and rangeland health, including understanding reference conditions of soils and vegetation types in the planning area. I <a href="https://www.blm.gov/documents/national-office/blm-library/technical-reference/interpreting-indicators-rangeland-health-0">https://www.blm.gov/documents/national-office/blm-library/technical-reference/interpreting-indicators-rangeland-health-0</a></p>	<p>As stated in Section D.3.8, the BLM routinely conducts rangeland health assessments, and more frequently in areas where monitoring is required as described in the Rangeland Health and Standards Guidelines for California and Northwestern Nevada (BLM 1998). The IIRH protocol is not intended to be used for "independent monitoring or to determine trend" as stated on Page 6 of the BLM protocol Interpreting Indicators of Rangeland Health, Version 5. The protocol is intended only to provide a "preliminary evaluation" of rangeland health.</p>
Cunningham	Laura	I23	Western Watersheds Project	Consultation and Coordination	<p>We appreciate the BLM's very good alternatives towards conserving sensitive natural and cultural resources and considering long-term management for resilient landscapes, while trying to balance multiple uses. This is an above-average resource planning effort, and we would like to extend our support and help with approving the final plan. We would like to work with the BLM to make the final NCIP effort the best possible, and we truly appreciate your hard work on this. Please let us know how we can help provide our own data and expertise in the years ahead on sensitive species, vegetation communities, wildlife, grazing management, and fire management.</p>	<p>The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. NEPA and the associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process. The BLM is open to opportunities to collaborate with partners and will continue to meet with interested agencies and organizations throughout the planning process, as appropriate.</p>
Cunningham	Laura	I23	Western Watersheds Project	Fish and Aquatic Resources	<p>Alternatives B and D appear to open up public lands to livestock grazing in the Henley area along tributaries to the Klamath River and directly to the Klamath River. BLM needs to analyze how grazing will impact anadromous fisheries in the recovering Klamath River, and how increased erosion, trampling, vegetation impacts, and water quality impacts will affect the river and fish here.</p>	<p>Impacts to rivers and fish by livestock are described in Section D.2.6. The riparian habitat of the Klamath River and its tributaries were included in the analysis of grazing impacts to fish and aquatic species in lotic habitats (see Table D-44). Anadromous taxa of fish in the Klamath River Basin were included in the impacts assessment (see Table D-40).</p>
Cunningham	Laura	I23	Western Watersheds Project	Livestock grazing	<p>As noted in other sections, the number of acres of lands available to grazing and close to grazing in the Alternatives differs greatly, and on the whole the acres of available acres increases in Alternatives B, C, and D with respect to current management (Alternative A). Some lands with high value are closed in some alternatives such as B and D, while other areas in Alternative A that are potentially of high b]value are proposed to be opened to grazing but there is no analysis in the Draft EIS. This needs to be better analyzed in the Final EIS, as we have discussed here.</p>	<p>Please refer to Section D.3.8 for a detailed analysis regarding the impacts of each Alternative to Livestock Grazing within the planning area. Impacts to other resources as a result of these management changes are outlined under each resource section in Appendix D.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Livestock Grazing	Incorporating Interpreting Indicators of Rangeland Health(I) could go a long way in analyzing and monitoring soil and rangeland health, including understanding reference conditions of soils and vegetation types in the planning area. I <a href="https://www.blm.gov/documents/national-office/blm-library/technical-reference/interpreting-indicators-rangeland-health-0">https://www.blm.gov/documents/national-office/blm-library/technical-reference/interpreting-indicators-rangeland-health-0</a>	As stated in Section D.3.8, the BLM routinely conducts rangeland health assessments, and more frequently in areas where monitoring is required as described in the Rangeland Health and Standards Guidelines for California and Northwestern Nevada (BLM 1998). The IIRH protocol is not intended to be used for "independent monitoring or to determine trend" as stated on Page 6 of the BLM protocol Interpreting Indicators of Rangeland Health, Version 5. The protocol is intended only to provide a "preliminary evaluation" of rangeland health.
Cunningham	Laura	I23	Western Watersheds Project	Livestock Grazing	We are concerned that the preferred alternative D opens up more lands to grazing without an analysis of potential water quality impacts. Will the Final EIS undertake suitability and capability analyses for each allotment that might be opened up to grazing? We recommend this.	The analysis of environmental impacts to water resources from livestock grazing is included in Appendix D of the Proposed RMP/Final EIS. This includes the analysis of impacts associated with varying the areas available to grazing across the alternatives.
Cunningham	Laura	I23	Western Watersheds Project	Livestock grazing	Yet the DEIS fails to analyze the impacts of increasing BLM lands available for grazing, which differ drastically among the Alternatives, and all newly proposed Alternatives increase public lands available for livestock grazing from current management. DEIS Volume 2 maps show that the existing management, Alternative A, has much more BLM- managed lands unavailable for grazing. Alternative B, the supposed conservation-oriented alternative, and Alternative D, the BLM-preferred alternative, open up a large acreage of these unavailable lands to livestock grazing. We could find no analysis or detailed rationale for this.	Please refer to Section D.3.8 for a detailed analysis regarding the impacts of each Alternative to Livestock Grazing within the planning area. Impacts to other resources as a result of changes to areas available to livestock grazing are outlined under each resource section in Appendix D. The rationale for varying acres of lands available to livestock grazing is to develop a range of alternatives, as required by NEPA, based on the presence and use of other resource values and uses across the landscape.
Cunningham	Laura	I23	Western Watersheds Project	Public health and safety	Management of livestock grazing increases public health and safety risks due to potential interactions between livestock or guard/herding dogs and individuals that result in physical injury. Lands unavailable for livestock grazing lower public health and safety risks because interactions between livestock and the public would be avoided. (3-507) We support the minimum number of acres available to livestock grazing in order to limit public health impacts, which is acreage in Alternative A. Yet Alternative B and D also have differing areas closed to livestock grazing, so we believe that more analysis is needed in the Final EIS to map the impacts of proposed open and closed areas.	Areas closed to grazing for the different alternatives are presented in Map 2-39 (Alternative A), Map 2-40 (Alternative B), Map 2-41 (Alternative C), and Map 2-42 (Alternative D).
Cunningham	Laura	I23	Western Watersheds Project	Soils	BLM says that the less restrictive management strategy from a grazing perspective under Alternative C coupled with an increase in acreage allowed for grazing could result in additional soil impacts (erosion, degradation, and compaction) under Alternative C, although modern management techniques could ameliorate an increase in potential impacts. (DEIS 3-43-44) What are these modern management techniques? The Final EIS needs to detail these.	Modern management techniques would be incorporated at a project-level basis for new and updated Grazing Management Plans.
Cunningham	Laura	I23	Western Watersheds Project	Vegetation	2. Detail of Redwood Creek watershed allotments in Alternative A: See PDF for map. Detail of Redwood Creek watershed area allotments in Alternative D: See PDF for map. Redwood Creek watershed allotments appear to be opened up to livestock grazing, comparing maps from Alternative A and D. BLM needs to analyze and describe the impacts of opening up areas that may be coastal prairies to grazing which have not been grazed recently.	See figure entitled "Vegetation Cover Types" and Table D-15: coastal prairies do not occur in any of the acres available for grazing under any alternative.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Vegetation	3. Redding area allotments in Alternative A: See PDF for map. In the Redding area, BLM appears to be trading some grazing areas for others in its proposed allotments made unavailable for grazing in the different Alternatives. Removing protections from livestock grazing in large areas of BLM-managed lands in the Sacramento River watershed and Klamath-Trinity River watersheds in Alternative A (existing management) for management which would designate other areas for lands unavailable for livestock grazing in lesser amounts and in certain areas, seems like a harsh deal that we are not quite ready to accept. BLM needs to map out the natural resources that will be impacted by making large acreages available for grazing in Alternatives B and D, and analyze impacts in detail. We know these lands well and have worked in the region for USGS-BRD surveying for foothill yellow-legged frogs. The region is highly diverse with respect to vegetation communities, rare plants, Threatened and Endangered species, special status species, and wildlife. The areas we have visited harbor such diverse habitats as valley grasslands, coastal prairies, chaparral, blue oak savannas, knobcone pine forests, riparian areas along rivers and streams, mixed coniferous forests, montane meadows, and other plant communities. BLM needs to survey and map vegetation communities in detail, and rare alliances and rare plants as well as ungrazed grassland communities, before it approves new livestock grazing in these areas.	<p>The BLM has classified all lands in the decision area according to the vegetation cover classes described in the Affected Environment of the Proposed RMP/Final EIS. The Environmental Consequences section describes the anticipated effects of management, including for livestock grazing, on the vegetation cover classes. The cover classes have also been used to assess the potential for special status species to occur on the decision area, and the Environmental Consequences similarly describes the anticipated effects on these resources.</p> <p>The BLM is considering the comments connected to opening larger areas to grazing. The analysis has been revised to provide an updated explanation as to why this is being considered.</p> <p>Vegetation condition and resources within the proposed newly open areas would be analyzed on a case-by-case basis if or when an allotment were to be established and a BLM grazing lease were issued. Additional NEPA analysis for each specific allotment would identify resources such as BLM sensitive, CRPR for species found within the project area as well as potential impacts to other resources within the proposed livestock area. In this analysis for the NCIP, BLM has coordinated closely with the FWS to conduct a thorough analysis on impacts to federally listed and proposed candidate species. The species identified within the comment, if they were not listed, is because in coordination with FWS to issue a Section 7 consultation on impacts to listed species, they were not identified as qualifying for the analysis since the federal level does not analyze impacts on state listed species. However, if or when there is cross over between state listed, BLM sensitive and federally listed species, they would then be analyzed within a BA and BO.</p>
Cunningham	Laura	I23	Western Watersheds Project	Vegetation	<p>The DEIS says: Climate change will impact livestock grazing in the future by altering the availability and type of forage available for livestock grazing. Climate change may result in increased frequency, size, or severity of fires, which would change the ground cover and the vegetation type (particularly a transition to annual grass species from perennial grasses). During catastrophic wildfires, livestock grazing lessees are put more at risk of impacts as a result of wildfires; these impacts include needing to evacuate the lessees' animals and find temporary shelter for them, a loss of forage due to fire, and damage to grazing infrastructure. (3-18)</p> <p>The Final EIS should also analyze how livestock grazing reduces the potential of native vegetation communities and deep-rooted native perennial grasslands to sequester carbon in healthy soils. Methane emissions from commercial livestock production on public lands also needs to be addressed.</p>	<p>See Section D.2.1: "Livestock grazing actions are generally projected to result in localized air quality impacts, including windborne particulates from exposed soils as vegetation is removed by livestock (fugitive dust emissions) and methane as a byproduct from the animals. These air quality impacts would depend on the level of grazing (the amount of bare soils subject to wind erosion) and the number of animals grazed and associated methane emissions. The more land reserved for grazing may result in an incremental beneficial effect on air quality, however, this would be dependent on the number of animals grazed per acre and potential alternate land uses. Common management actions such as control of land utilization levels, erosion control, and livestock grazing standards would generally have a beneficial impact on air quality, because they promote grazing practices that aim to reduce fugitive dust emissions and promote soil and vegetation health for carbon sequestration. Because annual vegetation production, actual use levels by livestock, and patterns of distribution of livestock vary, the impacts on air quality, fugitive dust, and methane emissions would be speculative; however, there are no appreciable differences in the areas open to grazing among the alternatives, so their impacts are expected to be similar, although are discussed under each alternative."</p>
Cunningham	Laura	I23	Western Watersheds Project	Vegetation	The Final EIS should detail why the Preferred Alternative D proposes to open up more chaparral and shrubland plant communities according to the chart at 3-92: See PDF for Table 3-15.	Compared to the No Action Alternative, there would only be 700 more acres of chaparral shrubland open to grazing. This equates to 0.005 percent of the total planning area, which is a negligible amount.
Cunningham	Laura	I23	Western Watersheds Project	Vegetation	We also disagree that there are no appreciable differences in Alternatives, as Alternatives B, C, and D open up large acreages to grazing on potentially sensitive resources, delicate soils, riparian areas, and vegetation communities not adapted to heavy bovid grazing. This needs to be analyzed.	For soils, level of impact based on acreage is presented Section D.2.2. Grazing is specifically addressed and the level of impact between alternatives analyzed in comparison of alternatives. These discussions do present the difference between alternatives from a Soils perspective.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	123	Western Watersheds Project	Water resources	<p>Acres open to livestock grazing (and subsequent surface-disturbing activities) as a result of Alternative A, Alternative B, Alternative C, and Alternative D are summarized in Table 2-1 and compared below. There is also a qualitative discussion of management relative to alternatives. Alternative A under current management plans allows for just over 186,900 acres of livestock grazing, while Alternative B, Alternative C, and Alternative D would allow for an increase in this allowable acreage, with Alternative B allowing for an increase to 232,800 acres and Alternative D allowing for an increase to 237,700 acres, and Alternative C allowing the largest increase to approximately 271,800 acres. Areas restricted that do not allow grazing under current management plans (and subsequently under Alternative A), are currently just under 195,300 acres. With the increase in grazing acreage allowable under Alternative B through Alternative D, these alternatives would subsequently necessitate a decrease in grazing restrictions to 144,500 acres for Alternative B and Alternative D, and less restrictions under Alternative C (110,400 acres). However, in general, BLM lands are open to grazing unless specifically closed within an RMP or wilderness designation that does not already have existing grazing. The actual ability to graze these public lands is dependent on suitability criteria which gets analyzed through on-the-ground monitoring, NEPA analysis and administrative efforts to establish project-specific and appropriate allotments taking into consideration forage, steep slopes, parcel size, access, and more. There are many sections of lands that are not appropriate for grazing due to limiting factors such as slope, forage, and access, yet these areas may be included in “open” areas for grazing until further on-the-ground analysis can be done at the project level. Therefore, a comparison based on acreage alone does not mean that the total acreage would ever be opened completely to grazing. (3-57)</p> <p>BLM needs to analyze allotments proposed to be open to grazing in Alternative D with respect to suitability and capability, fish and aquatic resources, and the potential for significant water quality impacts.</p>	<p>For Soils, this topic has been addressed. This level of analysis and site suitability will be addressed on the project level analysis, as appropriately described in the Proposed RMP/Final EIS.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Cunningham	Laura	I23	Western Watersheds Project	Water resources	<p>The DEIS says that these impacts could be mitigated: Allotment management plans or Rangeland Health Evaluations based off Rangeland Health Standards and Guidelines for California and Northwestern Nevada, could monitor grazing practices, evaluate resource conditions based on soil conditions and land health, and would also take into consideration water resource impacts. (3-51)</p> <p>These prescriptions could prescribe management activities to maintain water resource health and function, including fencing and riparian maintenance.</p> <p>These prescriptions could include periods of rest (rotation or deferment) to impose utilization limits within grazing allotments to allow ground cover to increase and soil litter to accumulate. Adequate ground cover would reduce soil erosion, increase infiltration to maintain water resources, and maintain watershed health and desired vegetation communities. The most acute areas for impacts would exist where livestock tend to concentrate such as salt licks, water sources, and fence lines. Water resources would be included in consideration of issuing grazing leases, and if analysis determines special protection is warranted, they would be included in the terms and conditions of the grazing lease. The BLM would work with lessees on Rangeland Improvement Projects to protect riparian resources. Rangeland Improvement Projects could include work such as installing infrastructure such as fencing to exclude cattle or installing water troughs that are removed from the riparian zone to draw animals away from the waterbody. (3-51-52)</p> <p>These management prescriptions are presented as potential actions, and the Final EIS should make prescriptions mandatory and in a public process. Unfortunately, the public is often excluded because of NEPA reviews for permit renewals being continued without public review under Section 402(c)(2) of the FLPMA as amended by Public Law No. 113-291. A preferable management direction would be to work with the public to better water quality with transparent allotment management plans, and environmental reviews for areas where allotments hold sensitive resources.</p>	<p>The EIS discusses several tools and practices that the BLM will use as needed, on a case-by-case basis, to achieve the Rangeland Health Standards. Because each allotment has different baseline conditions and different proposed grazing operations, the BLM maintains flexibility in applying practices at their discretion, on a case-by-case basis, in order to achieve these Standards. Therefore, revisions to the Proposed RMP/Final EIS were not made in response to this comment.</p>
Davidson	Sam	I22	Trout Unlimited	Air quality and climate change	<p>Under various authorities (including BLM Instruction Memorandum 2013-094 and 40 C.F.R. § 1502.22(b)), the NCIP must take a hard look at climate change impacts, and how management decisions will affect them. These impacts include diminishing water resources; longer/larger and more severe drought, wildfire and flood events; invasion of non-native species; and loss of wildlife habitat, soils, and other critical components to habitat health. BLM must identify and implement management prescriptions that do not impair or cause undue degradation to natural resources vital for biodiversity, water, and wildlife migration in the face of climate change. The Final NCIP must therefore (1) prioritize ecosystem resilience to both mitigate and adapt to climate change, in addition to addressing its direct impacts such as drought, flooding and wildfire, and (2) adopt long-term management prescriptions that maintain and enhance ecosystem resilience. In our view, DEIS Alternatives B and D would best satisfy these requirements.</p>	<p>The comment is noted, recognizing Trout Unlimited's belief that DEIS Alternatives B and D would best satisfy requirements set by various authorities.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	I22	Trout Unlimited	Alternatives - general alternative comments	<p>The NCIP update process should reflect not only the objectives for 30x30 but also provide specific prescriptions for achieving them in the planning area. Primary among these prescriptions should be designating Wilderness Study Areas (WSAs), Areas of Critical Environmental Concern (ACEC)s, and Wild and Scenic Rivers (WSRs), as few other tools at our disposal deliver such strong and diverse conservation benefits at scale. The BLM has broad authority under FLPMA to provide durable administrative protections for deserving resources through resource management planning processes. Given the short timeline for achieving the biodiversity goals of 30x30, and the rapid pace of climate change, the FEIS of the NCIP should ensure that more acres of the planning area will be managed sustainably in a primarily natural state. Thus, we support many of the conservation designations described in Alternatives B and D that would boost percentages of the planning area designated as America the Beautiful conserved areas (DEIS, Table I-2).</p>	<p>The America the Beautiful Initiative and the California 30x30 initiative (see Section I.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider “conserved.” Table I-2 in Chapter I of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>The action alternatives would prioritize acquisition of lands near ACECs to add to the protection of sensitive resources and to the overall significance of the area. BLM would pursue opportunities for acquisition of land with wetland habitat and migration/essential connectivity corridors of high biological value. Alternative D, in particular, would promote acquisition of coastal areas to offset sea level rise and prioritize lands for recreation and add protection of sensitive resources through coastal ACECs.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table I-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>
Davidson	Sam	I22	Trout Unlimited	Alternatives - lands and realty	<p>Due to the fragmented status of many BLM parcels in the planning area, and the consequent effects on wildlife habitat and migration corridor connectivity, it is important that BLM prioritize consolidation of the public lands under its jurisdiction and work with willing landowners and other agencies to improve connectivity and public access. Full funding of the Land and Water Conservation Fund by Congress and resources dedicated to achieving California’s commitment to 30x30 represent a rare opportunity to better connect existing public land holdings with high natural resource, recreational, and cultural values. Under NCIP Alternative B, 6,000 acres could be “disposed of” while under Alternative D 6,600 acres would be potentially available for disposal. We urge BLM not to dispose of any lands that may have significant ecological, water-source, fish and wildlife, or cultural values as determined through tribal consultation and site-specific analysis.</p>	<p>The disposal criteria for lands precludes disposing of lands with significant ecological or cultural values, unless it is determined that another entity could better manage and protect those resources (see disposal criteria) The Proposed RMP/Final EIS includes management actions that promote connectivity and public access. Disposal of parcels language is included in Table B-1.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	122	Trout Unlimited	Alternatives - lands and realty	<p>We also support prioritizing acquisition of private lands from willing sellers along key riparian corridors to improve connectivity, wetland habitat, wildlife migration corridors, coastal areas, habitat for sensitive species, WSR corridors, lands that would enhance recreation access or opportunities, lands within or adjacent to wilderness, WSAs and LWCs, lands that improve water quantity and water quality, and lands with important cultural and/or archaeological values.</p> <p>The NCIP's stated intention to acquire private lands only if county boards of supervisors approve of such transactions seems unnecessary (unless required by statute or agency direction; if so, it should be cited) and a potential obstacle to achieving some management objectives described in the plan. We suggest this section of the NCIP be revised to emphasize the importance of outreach to county and local governmental bodies in considering additions to BLM-managed lands via willing-seller acquisitions, without stating that any acquisition is contingent upon the approval of any stakeholder or non-federal interest.</p>	Revisions have been made to the analysis in the RMP/EIS. The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows applicable updates in Lands and Realty - Land Tenure Section D.3.2.
Davidson	Sam	122	Trout Unlimited	Alternatives - lands and realty	The final NCIP should prioritize acquisition of undeveloped private lands within the ACEC and suitable WSR corridor boundaries to protect and enhance connectivity, protect habitat, and provide public recreation access.	BLM acquisition criteria can be found in Table B-I Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).
Davidson	Sam	122	Trout Unlimited	Alternatives - lands and realty	We support the suitability findings for all 13.8 miles of Clear Creek, and suggest that the Final NCIP prioritize acquisition of undeveloped private land from willing sellers to protect habitat, improve connectivity, and enhance recreational access and opportunity.	BLM acquisition criteria can be found in Table B-I. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).
Davidson	Sam	122	Trout Unlimited	Alternatives - new special designation nominations	<p>The Draft NCIP reflects BLM's finding that several tributaries of the Middle Eel WSR are eligible and suitable for WSR designation, including 3.3 miles of Elk Creek, 5.7 miles of Eden Creek and its tributaries, 3.1 miles of Deep Hole Creek, and 1.6 miles of Thatcher Creek, due to their outstandingly remarkable fish and cultural values. Hayshed Creek, also a tributary to the Middle Eel, is found eligible due to its anadromous fish ORV but not suitable. Under a systems approach, it seems sensible to find all of these tributaries to be eligible and suitable. We support these findings of eligibility and suitability and suggest the Final NCIP reflect 'LM's determination that Hayshed Creek is also eligible and suitable.</p>	Revisions have been made to clarify management direction in the RMP/EIS. The suitability determination for Hayshed Creek has been updated in the Proposed RMP/Final EIS and Wild and Scenic Rivers Suitability Report. All the other creeks listed in the comment are identified as suitable.
Davidson	Sam	122	Trout Unlimited	Alternatives - new special designation nominations	The NCIP DEIS finds 4.5 miles of Butte Creek and .8 miles of the West Branch Butte Creek WSR suitable and recommends them for designation due to their outstandingly remarkable fish, scenic, recreation, history, and geologic values. We support the suitability recommendation for Butte Creek but recommend that an extended corridor should be determined suitable, from the eastern boundary of the Forks of Butte ACEC to the BLM lands near Centerville. The final NCIP should prioritize acquisition of undeveloped private land from willing sellers to complete public ownership of the suitable WSR corridor and existing ACEC.	This area is identified as suitable. Additionally, one of the identified acquisition criteria in Table B-I is to acquire land in or nearby WSRs.
Davidson	Sam	122	Trout Unlimited	Alternatives - new special designation nominations	The NCIP DEIS finds 7.6 miles of Lacks Creek eligible and suitable for WSR designation. BLM finds that 3.6 miles of Lacks Creek tributaries are also eligible and suitable. Due to the importance of these waters for salmon and steelhead, we recommend extending the eligible-and-suitable corridor of Lacks Creek all the way to its confluence with Redwood Creek.	This area is identified as suitable.
Davidson	Sam	122	Trout Unlimited	Alternatives - new special designation nominations	The NCIP DEIS finds suitable and recommends for WSR designation 2.1 miles of the NF Cottonwood Creek, 4.6 miles of the MF Cottonwood Creek, 4.7 miles of Beegum Creek (tributary to the MF Cottonwood Creek), and 3.1 miles of the SF Cottonwood Creek. We support the suitability findings for these waters and suggest that extended corridors be established, particularly for SF Cottonwood Creek, from the Yolla Bolly-Middle Eel Wilderness boundary to the South Fork's confluence with Brush Creek.	Segment lengths were determined during the eligibility phase, considering the location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	I22	Trout Unlimited	Alternatives - new special designation nominations	The NCIP DEIS reflects 'LM's finding that several tributaries of the South Fork Eel WSR are eligible for WSR designation, but not all were determined suitable. Suitable rivers include 6.3 miles of Cedar Creek and its tributaries and 3.9 miles Elder Creek and its tributaries. Eligible but not suitable waters include 1.2 miles of the East Branch South Fork Eel and small segments of three tributaries, Elkhorn Creek, Cruso Cabin Creek, and Tenmile Creek. Because of their importance to the SF Eel fishery, segments of the East Branch, Elkhorn Creek, and Cruso Cabin Creek, along with Cedar and Elder Creeks, are proposed for WSR designation in legislation currently working its way through Congress. BLM management should focus on protecting the anadromous fish and water quality values of this resource area. Because of their importance to the SF Eel fishery, segments of the East Branch, Elkhorn Creek, and Cruso Cabin Creek are proposed WSRs in legislation currently pending in Congress (along with Cedar Creek and Elder Creek).A true systems approach would include all of these South Fork tributaries as both eligible and suitable - the Final NCIP should reflect this determination.	The BLM recognizes the regional importance of the segments; however, the BLM has determined that managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. Additionally, the area is protected as a wilderness area which will meaningfully protect these values. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.
Davidson	Sam	I22	Trout Unlimited	Alternatives - new special designation nominations	The NCIP provides the opportunity to update the anadromous fishery ORV to reflect the current status of these species and their habitat and to identify additional ORVs not considered in 1980.The decline of most anadromous fish populations, degradation of habitat, climate change, formal recognition of Native American use of and culture associated with these rivers, and significant increases and changes and in recreational use all represent changed circumstances that warrant updating of existing ORVs and potentially adding new ones. We recommend that BLM revise the NCIP (p. 3-436) to reflect the multiple species of anadromous fish that comprise the fisheries ORV for these waters and describe the current status of these species and their habitat, and, to document in the FEIS the required conformity review of existing WSR boundaries and plans.We recommend the inclusion of unique life histories into the fisheries ORVs, including summer-run steelhead, spring and fall-run Chinook in coastal rivers, and spring, fall, late-fall, and winter-run Chinook as warranted in Sacramento River tributaries.	The Wild and Scenic Rivers Eligibility Report describes stream specific fish populations in more detail for eligible segments.  Reviews under WSRA Section 3(d)(2) are not required for WSR designated rivers under WSRA Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers however, nothing precludes the BLM from doing so in the future if the opportunity arises.While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers.The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.
Davidson	Sam	I22	Trout Unlimited	Alternatives - new special designation nominations	We support BLM's finding that five tributaries to the Trinity WSR, including 2.9 miles of Canyon Creek, 5.4 miles of Indian Creek, 1.5 miles of West Weaver Creek, and .1 mile of an unnamed tributary of West Weaver Creek, are eligible and suitable for WSR designation. However, Weaver Creek downstream of the East/West Weaver confluence has the same outstandingly remarkable value for fish as West Weaver Cr-eek - we suggest it likewise be determined eligible and suitable.	The BLM appreciates you pointing out the importance of this area. Segments were determined during the eligibility phase, and it seems Weaver Creek may have been overlooked during this phase. Segments were determined during the eligibility phase and Weaver Creek was not identified. Public scoping requirements associated with the eligibility process would preclude BLM from adding an eligible segment at this point.
Davidson	Sam	I22	Trout Unlimited	Alternatives - new special designation nominations	We support the suitability findings for 5.5 miles of the Shasta River, 3.4 miles of which flow through BLM- managed lands. BLM references the suitable segm'nts' outstandingly remarkable fish and recreational values. Because the suitable segments also provide very high ecological values, BLM management direction should include an ecology ORV.The final NCIP also should prioritize acquisition of undeveloped private land from willing sellers to protect aquatic and riparian habitat, improve connectivity, and enhance recreational access and opportunity.	The BLM has considered the ORVs for this area and fish, scenic, cultural, and recreation were identified.Additionally, one of the identified acquisition criteria in Table B-1 is to acquire land in or nearby WSRs.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	122	Trout Unlimited	Alternatives - new special designation nominations	<p>WSR Eligibility Inventory &amp; Suitability Recommendations: Extended WSR Corridors</p> <p>Previous WSR inventories conducted in 1993 (Redding RMP) and 1995 (Arcata RMP) identified WSR corridors that extended beyond the short segments where the stream flows on public lands managed by BLM. The 2018 and 2023 WSR inventories, however, largely focus on the eligibility of just the public land segments, rather than an extended corridor that more logically can be managed to protect WSR values. Consequently, the 2018 and 2023 inventories include more eligible segments but fewer eligible miles than the 1993/1995 inventories. We suggest that the suitable river tables and maps show both eligible miles on BLM-managed public lands as well as miles of the extended corridor.</p> <p>Extended eligible river corridors longer than just the BLM-managed segments are specified in the suitability tables only for Bear Creek, Big Chico Creek, Clear Creek, Hulls Creek, Indian Creek (Trinity River tributary) and the Mattole River. It seems sensible that all waters listed in the inventory as suitable would benefit from the establishment of extended river corridors that go beyond shorter segments on public lands, particularly where existing BLM management direction is to acquire more public lands from willing sellers in these corridors.</p>	<p>Table 1-2 in the Proposed RMP/Final EIS now shows length on BLM lands and mileage totals. In some cases where segments termini such as confluences with other designated or suitable rivers the segment length was extended in most cases. However, in most cases the BLM used the upper most and lower most managed lands to determine termini. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.</p>
Davidson	Sam	122	Trout Unlimited	Alternatives - new special designation nominations	<p>WSR Eligibility Inventory &amp; Suitability Recommendations: Ineligible Rivers</p> <p>The Revised WSR Eligibility Report (2023) (Table 2-3, pp. 2-15 to 2-17) provides a list of inventoried rivers determined ineligible. This table identifies some river segments as ineligible that actually are already in the National Wild and Scenic Rivers System, including .4 miles of the NF Trinity River, 2.2 miles of the NF Eel River, and 2.4 miles of the SF Eel River. These and any other existing WSR-designated river segments should be removed from the ineligibility table. We also suggest BLM include some narrative explaining the rationale for ineligibility determinations.</p>	<p>Thank you for noting the inconsistency. At this point, the BLM will not be making changes to the Eligibility Report.</p>
Davidson	Sam	122	Trout Unlimited	Alternatives - special designations	<p>Shasta and Klamath Rivers Canyon ACEC</p> <p>We support the proposed expansion of this ACEC and management as proposed under DEIS Alternative D, with language added to management objectives specific to protecting sensitive riparian and fisheries habitat values.</p>	<p>Management Directions were developed to protect sensitive riparian and fisheries habitat values. All future projects would have to consider Fisheries and Riparian values before the projects would be approved by the Authorized Officer.</p>
Davidson	Sam	122	Trout Unlimited	Alternatives - special designations	<p>The Trinity Alps are an iconic resource area and popular destination for backcountry trout fishing. We support designation of the proposed 220-acre Trinity Alps WSA identified during the LWC inventory and recommended under both alternatives B and D as described at DEIS p. 2-196. We also request that the following proposed WSAs from alternative B be included in the final NCIP: Yolla Bolly (Subunits 1, 2, and 3) Under Alternative B (DEIS, p. 2-9), 210 acres of the proposed Yolla Bolly-Middle Eel Wilderness additions included in S. 1776 and H.R. 3700 would be designated as a WSA. We support this proposed WSA because it will better protect a resource area vital for the Eel River's ecology and its salmon and steelhead populations.</p>	<p>The Proposed RMP/Final EIS identifies Section 202 WSA and how they will be managed as described in Table B-1.</p>
Davidson	Sam	122	Trout Unlimited	Alternatives - special designations	<p>Eden Valley</p> <p>We support designation of this ACEC and management as proposed under Alternative D to better protect important sources of cold water for listed salmonids, unique geologic features, and cultural and archaeological values. However, we recommend that the area be closed to OHV use given its remote location and that it currently has no legal public vehicle access, nor any routes designated for public use. While much of Eden Valley is proposed for addition to the Yuki Wilderness in S. 1776 and H.R. 3700, BLM notes that "illegal route proliferation is present" (DEIS, p. 3-410). Protecting this area's unique wilderness characteristics should be prioritized.</p>	<p>The Proposed RMP/Final EIS currently identifies this proposed ACEC as OHV limited, rather than OHV Closed. Current acquisition projects in the vicinity may create new opportunities for access wherein designated routes may be desired. Under OHV Limited, any future route designation or closure would require additional implementation-level planning.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	122	Trout Unlimited	Alternatives - wilderness/wsa/lwc	<p>In the Draft NCIP (DEIS at p. 3-450), BLM reports that 53,161 acres of land were inventoried for management as Lands with Wilderness Characteristics (LWCs) and that 34,080 acres were determined to meet the definition of LWCs, including Brushy Mountain/English Ridge (5,500 acres), Red Mountain (320 acres), Sacramento River Bend (Subunit 2) (6,640 acres), Trinity Alps (Subunit 4) (220 acres), and Yolla Bolly (Subunits 1, 2, and 3) (250 acres). We agree that these areas merit management as LWCs. We also recommend that the wilderness character of the following areas that are not proposed as LWCs be reconsidered: proposed Beegum Gorge ACEC; Eden Valley; proposed North Fork Eel River ACEC.</p> <p><b>Beegum Creek</b> We support the draft NCIP's proposal under both alternatives B and D to designate a 4,380-acre Beegum Creek Gorge Area of Critical Environmental Concern. BLM found this parcel fails to meet the minimum size-criteria for LWC designation. We suggest BLM consider this resource area as part of a contiguous block of wilderness-eligible lands managed by BLM and the adjacent Shasta Trinity National Forest (STNF). The roadless BLM parcel and the STNF's East Beegum Inventoried Roadless Area share Beegum Creek, whose values are well documented in the ACEC and WSR portions of the DEIS. This would better align with the federal lands agencies' stated commitment to taking a more holistic "all lands approach" to public lands that are adjacent but managed by different agencies.</p> <p><b>Eden Valley</b> Similarly, while we support designation of the proposed Eden Valley ACEC, we suggest this resource area's qualifications for management as an LWC be reconsidered. The proposed ACEC includes the proposed Eden Creek WSR; Eden Creek is an important tributary to Elk Creek, also proposed for WSR designation and important habitat for native steelhead. S. 1776 and H.R. 3700 propose to add the NCIP's Eden Valley ACEC to the nearby Yuki Wilderness and to designate Eden Valley Creek and Elk Creek as WSRs while leaving two roads open for BLM administrative use.</p> <p><b>North Fork Eel River</b> While we support the draft NCIP's proposal under both Alternatives B and D to establish a North Fork Eel River ACEC, we suggest BLM reconsider the wilderness characteristics of this resource area in a more "all lands" context, specifically, as part of a nearly three-mile stretch of wilderness-eligible USFS and BLM lands connected to the North Fork Eel River Wilderness. Note that this BLM parcel and adjacent National Forest lands are proposed as additions to the North Fork Eel River Wilderness under S. 1776 and H.R. 3700.</p>	<p>The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 for lands with wilderness characteristics managed as a priority over other uses.</p> <p>The BLM followed guidance provided in BLM Manual 6310-Conducting Wilderness Characteristics Inventory on BLM Lands (USDI BLM 2021). This policy states that USFS roadless areas not designated as recommended wilderness cannot be included in determining the size criteria for wilderness characteristics.</p>
Davidson	Sam	122	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	<p>A .4-mile eligible segment of Tenmile Creek was found eligible due to its outstanding anadromous fishery, yet the creek was determined unsuitable for designation. Tenmile Creek should be determined suitable from where it enters the BLM land to its confluence with the SF Eel.</p>	<p>The BLM maintains the conclusion that this segment of Tenmile Creek is not suitable for designation, as described in the Suitability Report.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	I22	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	<p>A crucially important tributary to the Sacramento River for anadromous salmonids, Deer Creek possesses outstanding scenery, recreation, fish, and ecological connectivity values. The creek is listed as non-suitable (App. G, pg. 3-61). The .2-mile eligible segment reflects only the portion of the creek flowing on BLM- managed public lands, even though the 1993 inventory documented an 8.1-mile eligible segment for Deer Creek extending from the Lassen National Forest boundary to the Deer Creek diversion dam. We support continued use of the extended 8.1-mile segment, as Deer Creek flows through the Deer Creek ACEC, with management direction to acquire from willing sellers more public lands in the in the extended corridor; provides a critical link to the systems management approach (Deer Creek flows through a large Natural Landscape Block and its upper and lower segments are considered Essential Connectivity Areas); and, Deer Creek's threatened spring Chinook salmon and winter steelhead seasonally migrate through and hold in pools in the 8.1-mile segment between the National Forest boundary and the Deer Creek diversion dam, while the 30 miles of Deer Creek on the Lassen Forest have been determined eligible and suitable for National Wild and Scenic River designation. For salmon and steelhead, the migration and holding habitat found in the downstream BLM segment is just as important as the spawning habitat in the upstream National Forest segment. We recommend the NCIP determine that the 8.1-mile segment of Deer Creek within the Deer Creek ACEC is eligible and suitable, and that management objectives prioritize acquisition of undeveloped private lands from willing sellers to improve connectivity, protect habitat, and provide public recreation opportunities.</p>	<p>The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.</p>
Davidson	Sam	I22	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	<p>A total of 1.5 miles across two segments of Big Chico Creek was found eligible due to its recreational value yet was determined unsuitable for designation. We recommend that Big Chico Creek be determined suitable, and that BLM also consider the outstanding anadromous fisheries values, which consist of spring-run Chinook salmon and steelhead, both of which are culturally significant to the Mechoopda people. While the short BLM-managed segments have a variety of outstandingly remarkable qualities, including high fish and wildlife values, nearby lands are also managed for ecological and recreational values, including the downstream City of Chico and Big Chico Creek Ecological Reserve properties and upstream portions of Lassen National Forest. We suggest the eligible segments of Big Chico Creek should remain eligible for WSR protections and the BLM should continue to provide interim protection.</p>	<p>The BLM recognizes the regional importance of Big Chico Creek for recreation; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's recreation ORV. Fish passage to the BLM managed segments is currently not possible, so a Fish ORV is not appropriate. If fish passage is established for this segment of Butte Creek, the BLM may reconsider the ORV determination in the future. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.</p>
Davidson	Sam	I22	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Casoose, Brin Canyon, and Horse Canyon Creeks all flow into Hulls Creek, an important tributary to the NF Eel River. The 2023 inventory found that some 16 miles of Hulls Creek is eligible and suitable for WSR designation due to its outstanding anadromous fishery value but its tributaries - Casoose, Brin Canyon, and Horse Canyon Creeks - were found unsuitable. BLM and CDFW surveys reported resident rainbow trout and numerous steelhead in Casoose Creek downstream of its confluence with Antone Creek. A CDFW survey of Horse Canyon Creek in 1996 found steelhead downstream of a waterfall located .8 miles upstream of its confluence with Hulls Creek. A CDFW survey of Brin Canyon Creek in 1996 found steelhead and mature rainbow trout in the .5 mile segment of Brin Canyon Creek upstream of its confluence with Horse Canyon Creek. WSR protection for these important Hulls Creek tributaries would strengthen protection of the North Fork's anadromous fishery by adding upstream fish habitat and existing sources of high-quality water that ultimately flow into the North Fork. We recommend the NCIP reflect a determination that the eligible segments of Hulls Creek, Casoose Creek, Brin Canyon, and Horse Canyon are all suitable for WSR designation.</p>	<p>Hulls Creek tributaries have been added to the "Hulls Creek Complex" as suitable.</p>



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	I22	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	Fish and Indian Creeks are important contributors of high-quality water to a segment of the main stem Eel River and support the Eel's outstandingly remarkable anadromous fishery values. The extended WSR segments should begin at their sources and continue downstream to their confluences with the Eel River. This strategy would better align with BLM management priorities pertaining to land ownership and a systems approach.	The BLM recognizes the importance of these creeks to the Eel River, and the identified values will maintain protections through several mechanisms. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.
Davidson	Sam	I22	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	The EBSF Eel and its tributaries are important for their contribution of cold, clean water to the SF Eel and its salmon and steelhead populations and should be considered as a hydrologic unit for management purposes. We suggest the eligible/suitable segments begin at the sources of Cruso Cabin, Elkhorn, and School Section Creeks and extend to their confluence with the EBSF Eel and include the EBSF Eel downstream to the Little Butte Ecological Reserve. BLM management should prioritize acquisition from willing sellers of undeveloped private lands in the WSR corridors and surrounding areas to improve connectivity and protect habitat and native salmonids.	The BLM recognizes the regional importance of the segments; however, the BLM has determined that managing this area as suitable wouldn't meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. Much of the area is protected as a wilderness and existing regulations will meaningfully protect these values.
Davidson	Sam	I22	Trout Unlimited	Appendix G: Draft Wild and Scenic River Suitability Report	WSR Eligibility Inventory & Suitability Recommendations: Eligible/Non-Suitable Rivers The NCIP DEIS, Vol. 3, Appendix G, Chapter 3 (pp. 3-1 to 3-161) identifies eligible rivers determined by BLM to be non-suitable. Non-suitability decisions are significant because once the NCIP Record of Decision is released these eligible but non-suitable segments will lose interim protection of free-flowing character, tentative classification, and outstandingly remarkable values. This is problematic for several eligible but non-suitable streams, and recommend that for some eligible rivers where BLM-managed public lands are small and fragmented, they remain eligible to allow for future acquisitions of undeveloped private lands from willing sellers and other action that improve WSR protection and management. In addition, eligible streams where current management direction already exists to acquire more public lands should be determined suitable.	This Plan follows BLM Wild and Scenic River Manual 6400, which references as policy guidance the Interagency Wild and Scenic River Study Process document that states "Agency-identified study river protection continues unless a river is determined not suitable for designation. For non-suitable Section 5(d)(1) rivers, protection of river values reverts to the direction provided in the underlying land use plans for the area." The outstandingly remarkable values on eligible segments that are determined to be non-suitable would be protected through other means, such as those provided in the Plan (e.g., ACEC, Riparian Management Areas, Water Quality), as well as regulatory mechanisms such as the Endangered Species Act and Clean Water Act.
Davidson	Sam	I22	Trout Unlimited	Consultation and Coordination	We support the proposed management of the English Ridge resource area as proposed under NCIP Alternative B (DEIS, p. 196), which would designate 5,500 acres of the Brushy Mountain /English Ridge area as a WSA. This designation would better protect streams such as Fish Creek and Indian Creek and their tributaries. The DEIS refers to enhancement of recreation opportunities on the Eel River Wild and Scenic River, such as prioritizing efforts to improve and enhance sustainable public access to landlocked BLM parcels (e.g., English Ridge). We appreciate this consideration and encourage BLM to work with tribes and other stakeholders to explore how sustainable recreation opportunities and improved recreational access for this relatively remote section of California's third longest river can be realized.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 for WSRs.
Davidson	Sam	I22	Trout Unlimited	Consultation and Coordination	Of the 14.7-mile Mattole River corridor determined extended eligible in the 2023 WSR inventory, about 2.7 miles flow through BLM-managed public lands. In addition, several Mattole tributaries were determined eligible (2 miles of Sholes Creek, 4.2 miles of Fourmile Creek and its North Fork, 1.5 miles of Grindstone Creek, and .2 miles of Eubank Creek). All of these eligible segments have outstandingly remarkable anadromous fish value. Because of the Mattole's importance for wild salmon and steelhead, we recommend BLM continue to manage the Mattole segments and its tributaries as eligible to maintain interim protection of fish values. This is another resource area where BLM should prioritize working cooperatively with tribes, stakeholders and landowners to prioritize acquisition of undeveloped private lands to improv connectivity, protect habitat, and enhance public and tribal access to the river.	The BLM recognizes the regional importance of the Mattole River and its tributaries as mentioned in the Gilham Butte ACEC and Upper Mattole ACEC in Table B-1. Additionally, the BLM has determined current federal and state laws provide protection to this area and protect the ORVs.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Davidson	Sam	I22	Trout Unlimited	Monitoring	We support the proposed Monitoring Plan for the planning area. A rigorous science-based monitoring system should be described in this plan, with intervals and standards, as appropriate, for evaluation of the plan's effectiveness. Such vigilant monitoring is crucial to the flexible adaptive management approach required as climate change intensifies.	<p>As described in the Proposed RMP/Final EIS, the BLM would adhere to the guidelines outlined in 43 CFR §1610.4-9 regarding monitoring and evaluation. The intervals and standards for assessing the approved RMP would be established in alignment with the sensitivity of the resources affected by the decisions made following the signing of the NCIP Record of Decision. These intervals and standards would facilitate ongoing evaluation to ascertain the effectiveness of management actions, detect any significant changes in related plans of other federal, state, or local agencies, or Tribes, and consider new data of significance to the plan. The BLM would provide for the monitoring and evaluation of the plan, following the established intervals to meet current BLM policy and best available methods and science to determine changes needed. Additionally, assessments would be conducted at other appropriate times to determine whether there is sufficient cause to warrant an amendment or revision of the plan, as specified in the regulations.</p> <p>Additionally, the BLM conducts a number of ongoing monitoring protocols across different resource areas which can be used to conduct meaningful analyses of a changing climate. Forest inventories, datasets of vegetation distributions, and robust wildlife monitoring across of a range of species are all baseline datasets from which the impacts of climate changes and management decisions can be evaluated. BLM will continue to work with partner agencies specializing in the collection of climate data including temperature, wind patterns, and hydrology as well as researchers focused on the impacts of climate change on flora and fauna across the planning area to continue using adaptive management to protect resources.</p>
Davidson	Sam	I22	Trout Unlimited	Other Laws	Legislative Redesignation of 2(a)(ii) Segments State rivers added to the federal system under 2(a)(ii) are to be managed by the state, but the law does not authorize the state to manage federal land in designated river corridors. This has created uncertainty over which agency should implement the federal law to protect the free-flowing condition and outstandingly remarkable values of 2(a)(ii) rivers. The US Forest Service co-manages with BLM 2(a)(ii) segments of the Klamath, Trinity, Middle Eel, NF Eel, and main stem Eel Rivers. To clarify administration and federal jurisdiction over the rivers where they flow through federal public lands, the Forest Service has recommended legislative redesignation of its 2(a)(ii) river segments in northwest California. To improve joint management of these river segments with the Forest Service and to clarify BLM jurisdiction to managed 2(a)(ii) segments, the BLM should likewise recommend legislative redesignation for its 2(a)(ii) rivers in the final NCIP.	This comment is outside the scope of the RMP/EIS. No change has been made. It is out of scope of this plan to recommend redesignation legislatively. The USFS, NPS, and the BLM utilize an MOU to closely coordinate management of 2(a)(ii) rivers.
Davidson	Sam	I22	Trout Unlimited	Other Laws	The former 320 acres of private land in the South Fork Eel Wilderness is recommended as a WSA under both alternatives B and D (DEIS, p. 2-196). Note that the area is also proposed as an addition to the South Fork Eel River Wilderness in current legislation working its way through Congress (S. 1776 and H.R. 3700).	The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. Decisions regarding land acquisition and land tenure can be found in Table B-1. For information about how future land withdrawals and acquisitions would be managed, refer to the Lands and Realty – Land Tenure section in the RMP/EIS.
Davidson	Sam	I22	Trout Unlimited	Other Laws	The NWSRA requires a conformity review of boundaries, classifications, and river management plans during the planning process for rivers designated prior to 1986 (which applies to the BLM's WSR segments in the NCIP). There is no indication in the NCIP DEIS that such a review has been completed. As part of the conformity review, the BLM should determine if any of its 2(a)(ii) segments would benefit from preparation of a Comprehensive River Management Plan (CRMP). The Trinity River WSR, for example, is a very popular recreation destination, flows through a mix of public and private lands, and is the setting for a large-scale fish habitat restoration program - making it an ideal candidate for a CRMP. We also note that BLM published a South Fork Eel River Draft Management Plan/EIS in 1990 and a supplemental draft in 1993. It is unclear whether this plan was ever finalized, but it should also be reviewed and updated.	Reviews under WWSRA Section 3(d)(2) are not required for WSR designated rivers under WWSRA Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers, however, nothing precludes the BLM from doing so in the future if the opportunity arises. While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers. The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Decker	Karie	37	Rocky Mountain Elk Foundation	Alternatives - lands and realty	RMEF recommends inclusion of plan components that seek opportunities to improve road and trail rights-of-way for access to hunting, fishing, and other recreational opportunities.	This is covered under the Land Tenure Goals and Objectives and Management Direction in Table B-1. The plan also includes criteria for land acquisitions in Table B-1, which specifically identifies acquiring lands that enhance recreation access, improves access to lands which meet recreation priorities in the Dingell Act, and improves public and administrative access to existing federal land identified for retention.
Decker	Karie	37	Rocky Mountain Elk Foundation	Alternatives - special designations	RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other treatments helps prevent catastrophic wildfires and assists in long-term ecosystem resilience. In addition, managing natural ignitions can help achieve fuel and vegetation goals. RMEF expresses concern about vegetation and timber management restrictions that would be in place following implementation of several ACECs, particularly those proposed for old growth protection. The draft Plan components lack clarity as to desired conditions for timber production or vegetation management that would support vegetation diversity and heterogeneous vertical structure. As-is, priority would be given to activities that protect old growth values. For this plan component, RMEF supports Alternative C, no designation of ACECs focused on protecting old growth and limiting active management activities. Considering RMEF's past and future conservation efforts in the Eel River area, this would include the Willis Ridge ACEC or Eden Valley ACEC. Instead of landscape-scale ACEC management direction, RMEF recommends that specific management treatments and decisions be made at the project level where potential impacts can be better assessed.	This comment is outside the scope of the RMP/EIS. No change has been made. RMPs provide high-level management direction; future site-specific planning will be done as needed.
Decker	Karie	37	Rocky Mountain Elk Foundation	Alternatives - wildlife	RMEF appreciates the BLM's recognition of the role that hunting plays in wildlife management and its continued importance as a wildlife-dependent recreational activity. However, within the Wildlife Section, row 86, management direction identifies over 89,000 acres to be managed as critical deer winter range and to pursue opportunities to improve access for deer hunting. We recommend consultation with CDFW to identify crucial habitat (parturition areas, corridors, summer/winter range) for tule elk and other big game species and include management direction to conserve/enhance these habitats, explore land tenure adjustments, and improve public access.	Table B-1, Wildlife, in the Proposed RMP/Final EIS includes management direction for managing big game species. The BLM will continue to coordinate with CDFW on management and monitoring at the implementation level. Table B-1 Land Tenure of the Proposed RMP/Final EIS includes a goals and objectives to target acquisition of land that has a high resource value or to provide public access and management direction in Table B-1 (land adjustments) to acquire lands or interests that complement important resource values and further management objectives. Table B-1, Criteria for Lands Proposed for Retention, the Proposed RMP/Final EIS includes management direction to retain lands with Essential Corridors of Connectivity, identified as important for wildlife habitat, and lands that meet the criteria in the Dingell Act for providing access from public roads to aid in resource management and public access. Furthermore, Table B-1, Criteria for Land Acquisition, includes management direction to enhance recreation access and other opportunities. Table B-1, Recreation and Visitor Services, include goals and objectives to provide for a diversity of recreational opportunities and access.
Decker	Karie	37	Rocky Mountain Elk Foundation	Alternatives - wildlife	California is the only state where tule elk occur, and the total population is estimated to be only 5,000 animals. Tule elk tend to stay in general geographic areas and have limited migratory patterns. The ERP Project is at the northern geographical range for tule elk and is a focus area where RMEF pursues consolidating habitat to secure the future of this unique population. Tule elk serve 'distinct roles and contributions' to multiple user types and the BLM Resource Management Plan (Plan) plays an important role in supporting future big game populations. RMEF recommends recognition of elk as an important species for their economic and recreational value and include plan components that develop habitat conditions to support healthy elk populations.	See Table D-27 and management actions that pertain to elk and big game. The BLM will work with CDFW on Tule elk habitat and monitoring and the BLM is already managing for ungulate habitat.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Decker	Karie	37	Rocky Mountain Elk Foundation	Consultation and Coordination	A significant portion of these acres conserved in California fall within the Northwest California Integrated Planning (NCIP) area, specifically, the Eel River drainage, east of Willits. The Eel River Peninsula Conservation Project (ERP) is a landscape scale conservation project totaling more than 70,000 acres, once complete, and is composed of multiple phases. The project is adjacent to the Mendocino National Forest, public lands managed by the Bureau of Land Management (BLM), several State Land parcels and other private properties. The ERP aims to protect tule elk habitat, including elk calving areas and migratory corridors, enhance connectivity and public access to existing public lands, and protect private working timber and rangelands. RMEF is currently working with the BLM and other partners on an acquisition in this area, near the Eden Valley Wilderness Study Area. The Elk Creek Acquisition is an active project that will conserve 3,380 acres and more than 15 miles of perennial and intermittent streams. RMEF asks for close coordination with BLM on the disposition of the parcel (land use and management designations) upon project closing.	The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. NEPA and the associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process. The BLM is open to opportunities to collaborate with partners and will continue to meet with interested agencies and organizations throughout the planning process, as appropriate.
Dorsey	Ann	140	N/A	Alternatives - lands and realty	prioritizing the acquisition of new lands from willing sellers along key riparian and wildlife migration corridors, in critical deer winter range, wetland habitat, coastal areas, habitat for sensitive native species, proposed and designated Wild and Scenic River corridors, and lands that would provide recreation access, improve water quantity and quality, and are within or nearby Wilderness, WSAs, and LWCs.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Drake	Madeline	43	California Natural Resources Agency	Alternatives - new special designation nominations	The preferred alternative in the DEIS (Alternative D) generally does an excellent job of balancing opportunities for resource use such as recreation, motorized and mechanized travel, and livestock grazing, with maintaining ecological function and meeting land capability to protect habitat connectivity. However, given the urgency of the biodiversity and climate change crises we face, we encourage BLM to enhance conservation measures on Brushy Mountain-English Ridge (5,500 acres) and Yolla Bolly sub-units (210 acres) by managing as Wilderness Study Areas as described in Alternative B due to the important ecosystems and habitat characteristics these areas conserve. Elevating the importance of these two areas in addition to Red Mountain and Trinity Alps (as described in Alternative D) is consistent with areas under consideration for Wilderness designation in Representative Jared Huffman's Northwest California Wilderness, Recreation, and Working Forests Act (HR 3700) and Senator Alex Padilla Protecting Unique and Beautiful Landscapes by Investing in California (PUBLIC) Lands Act (S.1776).	The Proposed RMP/Final EIS identifies Section 202 WSAs and how they will be managed as described in Table B-1.
Drake	Madeline	43	California Natural Resources Agency	Alternatives - wildland fire	Finally, as noted in the NCIP, we are cognizant of the disrupted fire ecology as an overarching concern impacting the entire plan area. For all lands included in the NCIP, we recognize and support the need for fire suppression and fuels treatments that prioritize and balance overall forest health and public safety. We encourage BLM to consider a preapproval process for utilizing mechanized fire suppression methods in WSAs, ACECs, and LWRs where needed to ensure the safety of the public and firefighters are not at risk. This is especially important in areas adjacent to private lands and communities to avoid overly cumbersome approvals that have the potential to reduce the response capabilities for wildfires. We are committed to working with our federal partners on improving wildfire resiliency in California utilizing the best available tools and information for restoring healthy fire ecology.	Table B-1, rows 98 – 109 note that use of mechanized suppression equipment within ACECs, Wilderness, WSAs, and lands with wilderness characteristics, requires approval from the Authorized Officer (Field Manager). The requirement for approval of equipment use allows for BLM to reduce impacts/suppression damage and participate in strategic decision making with fire protection agencies. Wildfire section clearly states in Goals/Objectives the priorities for protecting life and property along with ecosystem function and wilderness values. Preapproval in special designation areas would not meet management objectives.
Evans	Steve	102	CalWild	Alternatives - new special designation nominations	Table 2-2, pg. 2-194 indicates that all suitable WSR segments classified as Recreational will be managed for VRM class III (partial retention). However, we believe that the BLM has an obligation to manage segments with an outstandingly remarkable scenery value to a higher (protect and enhance) standard, regardless of classification. Segments classified as Recreational but possessing scenery ORV should be managed for VRM class II (retention). This includes Recreational segments of Battle Creek, Canyon Creek, MF	Scenic values would be protected as an ORV even under a Recreational WSR classification.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Evans	Steve	102	CalWild	Alternatives - new special designation nominations	VRM management is not consistent throughout the draft NCIP for the Sacramento River Bend Area. For example: 1. Map 2-7 in Appendix A depicting VRM for Alt. D shows the Sacramento River Bend allocated to a mix of VRM class II (Retention) and VRM class III (partial retention). This is confirmed in the narrative for the Sacramento River Bend ACEC on pg. 3-393. However, the VRM II allocations for the Sacramento River Bend Area appear to include eligible WSR corridors and some but not all of the Bend Area LWCs depicted on Map 2-54. 2. Table 2-2 Vol. I, pg. 2-77 indicates that for Alt. B and D, the Sacramento River Bend ACEC will be managed for VRM class III (partial retention), except lands with wilderness characteristics will be managed as VRM class II (retention). 3. Table 2-2, Vol. I, pg. 2-169 indicates that for Alt. B and D, the Sacramento River Bend ACEC will be managed for VRM class II (retention). We urge that the final NCIP be clarified to show that all lands in the Sacramento River Bend ACEC be managed for VRM class II (retention) except for the existing powerline corridor in the southern half of the ACEC.	Thank you for identifying the inconsistencies in the alternatives and maps. The BLM has addressed these inconsistencies into the Proposed RMP/Final EIS. The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts.
Evans	Steve	102	CalWild	Alternatives - wilderness/wsa/lwc	Table 2-2, pg. 2-197 indicates that LWCs will not be managed to minimize impacts to wilderness characteristics in Alt. D. while pg. 2-198 indicates that LWCs in the Sacramento River Bend Area will be managed to protect wilderness characteristics under Alt. D. We urge that the final NCIP be clarified to indicate that all 6,640 acres of LWCs in the Sacramento River Bend Area be managed to protect their wilderness characteristics.	Revisions have been made to clarify management direction in the RMP/EIS. The discussion of Sacramento River Bend Area in Table B-I has been updated to reflect the acreage of the Proposed RMP/Final EIS that will be managed as having lands with wilderness characteristics managed as a priority over other uses. The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts, by limiting shooting to designated areas only.
Evans	Steve	102	CalWild	Appendix A: Maps	Map 2-12 also shows parcels identified for disposal that encompass the Middle and North Forks Cottonwood Creek suitable WSR corridors. Both streams were found suitable and proposed for designation in the draft NCIP. Disposal of public land in these suitable WSR corridors would violate the NCIP's land tenure retention criteria which includes retaining public land in WSR designated management corridors; lands that provide habitat for proposed, candidate, and federally listed species; and lands with riparian areas or perennial surface water. Disposal of lands within the suitable WSR corridors also violates BLM guidelines requiring the agency to protect the free-flowing character and outstanding values that made the stream eligible.	The BLM changed the Alternative D lands identified for disposal to no longer include Alternative D WSR suitable corridors.
Evans	Steve	102	CalWild	Appendix A: Maps	The scale of the NCIP maps and the lack of geographical features makes it difficult to determine the impacts of land disposal on suitable WSRs and other special areas. The BLM should ensure that the final NCIP does not identify for disposal public land parcels in suitable WSR corridors and other special areas. Thank for considering these supplemental comments.	The BLM changed the Alternative D lands identified for disposal to no longer include Alternative D WSR suitable corridors.
Evans	Steve	102	CalWild	Appendix A: Maps	Appendix A Map 2-12 Alt. D Land Tenure shows parcels identified for disposal in the Trinity Wild and Scenic River corridor. This violates section 8(a) of the National Wild and Scenic Rivers Act which withdraws "All public lands within the authorized boundaries of any component of the national wild and scenic rivers system...from entry, sale, or other disposition under the public land laws of the United States." All public parcels in the Trinity WSR corridor should be retained.	The BLM changed the Alternative D lands identified for disposal to no longer include Alternative D WSR suitable corridors.
Felice	Pace	33	The Grazing Reform Project	Alternatives - lands and realty	1. It is imperative that BLM retain the parcel of land located a short distance below the confluence of Scott River and Wildcat Creek. This parcel provides the only public access to the Upper Scott River's Valley segment of the River. It is used, mostly by locals but also visitors, to float the Valley Segment of Scott River. This is a great trip and resource for young people too young for white water and a way to study listed and at risk species like the Bank swallow in their natural habitats.	This parcel has been identified for retention under Alternative D. BLM retention criteria can be found in Lands and Realty - Land Tenure, Table B-I.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Felice	Pace	33	The Grazing Reform Project	Alternatives - livestock grazing	2. Unmanaged and poorly managed grazing on BLM lands in the region is damaging water quality and wetland habitat. These impacts can be greatly reduced but only if the BLM will require regular active herding, including rotation of grazing among the various parts of the grazing area. To address water quality and water supply degradation via grazing, the BLM must require appropriate herding to control and reduce impacts. Even where rotation among pastures is not feasible, grazing permit holders should be required to regularly herd their livestock out of riparian areas and wetlands to underutilized uplands.	Riparian areas within grazing allotments will be managed to meet the Aquatic Conservation Strategy objectives as outlined in the Riparian Management Area section. Potential impacts to riparian resources would be analyzed at the project level and project design features would be implemented to ensure no significant impacts to riparian areas in grazing allotments.
Fisher	Skylar	22	Trinity County Fire Safe Council	Alternative D (preferred alternative)	We agree that Alternative D should be designated as the preferred alternative. In Table 2-2 Land Use Plan Decisions by Alternative, Alternatives B through D are documented as having the land management direction of emphasizing wildfire risk mitigation actions, such as Community Wildfire Protection Plans (CWPPs), and supporting the creation of CWPPs. As the TCFSC has led the updates to and maintenance of the Trinity County CWPP since its inception in 1999, we agree that federal partners are essential to the plan's success. That being said, only committing to support the document's development is not enough. Strengthening Alternative D should include language that commits the BLM not just to participate in CWPP development but also to reference the plan in determining fuels management projects aimed at reducing wildfire risk on both BLM property and the wider community. The BLM's continued partnership in the Trinity County CWPP is essential to its success and aligns with the NCIP's objective of adopting locally developed approaches to resource management. We urge the BLM to adhere to all pertinent local ordinances, plans, and resolutions when maintaining lands within Trinity County.	The BLM Fire and Fuels programs are guided by existing policy to participate in the development of CWPPs by non-federal stakeholders in order to promote community input and prioritization of fuels reduction projects on public lands, especially in WUI environments. Reference: H-9211-1 – FIRE PLANNING HANDBOOK: IV.C.1. Community Wildfire Protection Plans - The Healthy Forests Restoration Act (HFRA) provides communities the opportunity to influence where and how federal agencies implement fuel reduction projects. The HFRA places priority on treatment areas identified by communities through CWPPs. The minimum requirements for a CWPP (as described in HFRA) are: 1. A CWPP must be collaboratively developed by local and state governments in consultation with federal agencies and other interested parties. 2. A CWPP must identify and prioritize areas for hazardous fuel reduction treatments and recommend the types and methods of treatment that will protect one or more at-risk communities and essential infrastructure. 3. A CWPP must recommend measures that homeowners and communities can take to reduce the ignitability of structures throughout the area addressed by the plan. FLPMA specifically directs the BLM to coordinate with federal, state, local, and Tribes to assist in resolving inconsistencies between BLM's land use plans and local land use plans, to the maximum extent consistent with federal law and the purposes of FLPMA. Appendix E lists the relevant plans, policies, and programs that were reviewed. The BLM did not identify any inconsistencies.
Fisher	Skylar	22	Trinity County Fire Safe Council	Alternatives - wildland fire	Consistent with the 2003 Healthy Forests Restoration Act, we recommend the BLM adopt the wildland urban interface (WUI) boundaries as defined within the Trinity County CWPP. These boundaries were developed through combining the Shasta-Trinity, CAL FIRE, and BLM WUI boundaries and then incorporating geography, climate conditions, weather patterns, local areas of concern, ingress/egress, community placement, and community feedback. Aligning BLM's vegetation management planning with these defined WUI boundaries would better serve the community's goals and interests.	The Proposed RMP/Final EIS does not adopt the WUI boundary outlined in the Trinity CWPP. The RMP utilizes a one-mile buffer from developed areas, travel routes, and WUI infrastructure as defined by CalFire community assessment fire risk modelling. The Trinity CWPP recommends a two-mile buffer. This was not carried forward in the NCIP but was considered during WUI buffer development.
Fissel	Michael	134	N/A	Other Laws	In April 2022 the Department of Interior released its Equity Action Plan which addresses the lack of access on public lands. In order to advance equity of access on public land for those with mobility impairment disabilities, it is important to recognize that discrimination towards Americans with disabilities within federal land management agencies is deeply rooted and hidden in plain sight. Recreation, primarily motorized recreation, has taken a backseat to conservation and protection. Motorized recreation is often the only way those with mobility impairment disabilities are able to access public lands. BLM should ensure that the plan complies with the Department of Interior's Equity Action Plan, which recognizes that restrictions on motorized access to public land create barriers of access to those with disabilities.	The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-1, Row 352) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan.
Flick	Pamela	110	Defenders of Wildlife	Alternatives - fish and aquatic species	We also recommend prioritizing decommissioning unnecessary roads used in past commercial harvesting projects to reduce erosion and sedimentation of streams and rivers and reconnect habitat; and replacing non-functional or undersized culverts on access roads to allow for fish passage.	The Soils, Water Quality, and Riparian Management Areas sections discuss prioritizing the removal or decommissioning of roads that are potential sediment sources. The BLM would develop and implement a multi-tier sediment assessment and would use that assessment to prioritize projects to reduce sedimentation. The Riparian management Areas section includes upgrading culverts for fish passage.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - livestock grazing	Livestock grazing: For livestock grazing, acres grazed by livestock grazing within grazing allotments are essentially the same - Alternative A, 62,600 acres; Alternative B, 62,000 acres; Alternative C, 64,500 acres; and Alternative D, 62,100 acres. We also consider acres "administratively" open to livestock grazing inadequate because it ranges from 186,900 acres in Alternative A (No Action), 232,880 in Alternative B, 271,800 in Alternative C and 237,700 acres in Alternative D (Preferred). All three action alternatives B, C and D would increase acres open to livestock grazing compared to Alternative A. We recommend that BLM include additional alternatives that would reduce the total amount of acreage open to livestock grazing.	Acreage for the Lightning Camp Ridge allotment was decreased as part of the alternatives as well as the closure of Lake Mountain Allotment. Within this plan many areas, including ACECs and proposed Section 202 WSAs, would be closed to grazing. Many of the alternatives include lands that are now closed, however, with the inclusion of the proposed lands in the Covely Vicinity Area which would become open. This has offset the size that would become available, but the BLM does consider options to close new areas and keep areas closed through this RMP. The BLM has a multiple use mission. In accordance with FLPMA 1976, Sec. 102 (a)(1) "the public lands shall be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber and fiber from public lands." And, (c), "The term "multiple use" means the management of public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services [...] a combination of balanced and diverse resource use that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values, [...]." This means that the BLM evaluates the multiple resource benefits available for use while considering the long-term sustainability of such resources. This includes range, which is a consideration for this RMP. These lands identified in the original Arcata RMP 1996 were designated closed without rationale. Any individual allotments that could be created would be on a case-by-case basis and would need to follow criteria that identify it as suitable for grazing. Identification of areas that are now open to grazing does not mean they would immediately be grazed but would go through additional analysis to determine if the desired area is suitable to sustain a livestock operation, then an allotment could be established. Determination of site suitability includes an assessment of resources including vegetation, cultural resources, wildlife, sensitive species, and other site-specific factors. The BLM is considering the multiple use mission when evaluating lands open or closed to grazing under this RMP.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - livestock grazing	Please include additional information on livestock grazing in the Proposed NCIP and Final EIS, specifically 1) what grazing allotments would be open and closed, 2) any new allotments that would be designated on lands identified above as open to livestock grazing and 3) the results of the most recent rangeland health assessments and determinations. We recommend that the Proposed NCIP include an objective where BLM would accept voluntary grazing permit relinquishments and permanent retirement of livestock grazing allotments, particularly for those that have had historical noncompliance problems or conflicts with natural resources or other public lands uses.	The RMP does show areas where allotments are and what would be open and closed under this plan in the alternatives. No new allotments have been or would be identified under this RMP, only identifying lands open/closed to grazing is completed at the RMP level. Allotment designation is done at the implementation level and outside the scope of this plan. Results from Rangeland Health Standards are available within the EA or EIS for individual allotment analysis and not included in this plan. Considering that resource conditions change and are variable with climate trends and use, it would not be appropriate to include that information in this plan.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - livestock grazing	We request clarification on the acres "administratively" open to livestock grazing and the process used to authorize any new grazing.	Text describing the acreage open to grazing has been revised for clarity. 43 CFR § 4130.2 - Grazing permits or leases provides additional clarification regarding administrative procedures for authorization of grazing permits.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - livestock grazing	In addition, we recommend an additional alternative or alternatives that significantly reduces or eliminates acres of public land open to grazing within areas with rivers, streams and wetlands; and habitat for species that are known to be sensitive to or adversely impacted by grazing. One alternative could be the elimination of the 28 allotments that are vacant or not currently used.	One of the other alternatives (Alt D) reduces acreage available to grazing. However, closing the vacant allotments to grazing permanently reduces the livestock use permanently, and eliminates a viable option for landscape level fuels reduction as well as posing a harm to socioeconomic groups that rely on the livestock industry.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - livestock grazing	We also request that BLM include in the Proposed NCIP the requirement for livestock grazing permittees to use nonlethal tools and strategies known to be effective in reducing wolf-livestock conflicts.	The BLM would coordinate with CDFW and USFWS if any conflicts arise within grazing allotments. Conflicts would be addressed at the implementation level.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - livestock grazing	We request that BLM incorporate management measures in the Proposed NCIP to minimize overlap between wolves and livestock on the landscape, including voluntary retirement of grazing allotments that may present a higher likelihood of wolf-livestock conflicts, including allotments that contain or are in close proximity to known wolf dens or rendezvous sites.	The BLM would coordinate with CDFW and USFWS if any conflicts arise within grazing allotments. Conflicts would be addressed at the implementation level.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - new special designation nominations	Under Section 102(a)(11) of FLPMA, BLM is charged with promptly developing and implementing regulations and plans for the protection of ACECs; and prioritizing the designation and protection of ACECs under Section 201(c)(3). Given the above mandates under FLPMA, we recommend that BLM give highest priority to developing and implementing actions necessary to protect the values for which each existing ACEC was designated, and to monitor the condition of those resources so that corrective actions can be identified and implemented where ACEC resources are being impacted by other multiple use activities, climate change or are threatened by wildfire due to excessive fuel loads. BLM should also give high priority to designating and protecting new ACECs based on the relevant and important resources and their values.	ACEC designations emphasize that special management is needed to protect R&I values. ACEC proposed management can be found in the Proposed Action, Appendix G ACEC Report, and also in Table B-1 and in the Management Common to All in the ACEC's section.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - travel management	At a minimum, BLM must correct the deficiencies in the RMP and DEIS. First, BLM must apply and implement the ORV designation criteria at 43 CFR 8342.1 to each of the open and limited OHV areas proposed in the alternatives and disclose how it did so.	See table in Travel and Transportation Management Appendix D, Section D.3.7 for a comparison of designation criteria and OHV areas. The BLM used a data set of known preliminary routes to quantify impacts for the EIS. The analysis in Travel and Transportation Management Section D.3.7 showed that the Proposed RMP/Final EIS would not close any of these preliminary routes. Future implementation level travel planning will establish a more definitive inventory of routes.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - travel management	ORV use: The alternatives allowing ORV use are essentially the same - 540 miles under Alternative A, 530 miles under Alternative B, 540 miles under Alternative C and 540 miles under Alternative D. We recommend that BLM include additional alternatives that would allow ORV use on significantly fewer miles of existing and designated routes while concurrently closing routes that adversely impact special status species and their habitats. We provide additional comments on this topic in # 3 (Travel Management).	The planning level decision in the Proposed RMP/Final EIS is to have areas open, limited, or closed. In the Proposed RMP/Final EIS we do not specifically identify routes for closure in limited areas. This is why these numbers do not vary by alternative. Future route specific implementation level planning will happen after the NCIP is completed.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - travel management	Second, BLM must provide more information about the existing 205 miles and the 540 miles of OHV routes described in Alternative A. For routes that have not been considered previously in a travel management process, BLM must make clear in the EIS that those routes constitute a baseline insofar as they document user-created damage but do not constitute a baseline of designated or approved routes.	The planning level decision in the Proposed RMP/Final EIS is to have areas open, limited, or closed. In the Proposed RMP/Final EIS we do not specifically identify routes for closure in limited areas. This is why these numbers do not vary by alternative. Future route specific implementation level planning will happen after the NCIP is completed.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - travel management	Third, BLM should commit in the RMP to undertake travel management planning within two years; if BLM does not expeditiously undertake travel management and leaves the lands under a "limited to existing" scheme, the result will be more user-created routes and damage. As part of the travel management process, BLM must provide an updated inventory of travel routes including which were established through a NEPA process and which were user-created.	Specific route designations would be made in an implementation-level travel and transportation management planning process following the completion of the RMP. Per BLM Handbook H-8342, all Travel and Transportation Management planning should be completed within 5 years of the signing of the Record of Decision (ROD) for the RMP. The BLM Arcata and Redding Field Offices would undertake travel management planning within 5 years per BLM policy.
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - travel management	We find the description of existing routes in the DEIS confusing. The DEIS states that there are 205 miles of known routes, yet the alternatives all propose 530-540 miles of motorized routes. Are the 205 miles of known routes designated previously in a travel management decision? How does BLM know it has an addition 300+ miles of motorized routes on its estate if an inventory does not exist?	Revisions have been made to the analysis in the RMP/EIS. The analysis has been updated for clarity in Section D.3.7. The existing RMPs have only designated a few areas as OHV limited or closed to OHV use, and undesignated lands have been managed as open to OHV travel by default. While there is no comprehensive travel management plan for the planning area, several site-specific designations for routes have occurred through various land use plans or Federal Register notices. See Table D-78.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Flick	Pamela	I 10	Defenders of Wildlife	Alternatives - travel management	BLM Policy Manual 1626 provides direction on addressing travel management in land use plans. BLM is directed to zone the planning area into closed, open and limited ORV areas in the RMP. "The decision-making process used to designate ORV areas must be thoroughly documented in the administrative record, summarized and analyzed in the NEPA document supporting the designation decisions. The BLM must specifically document how it considered and applied the designation criteria in 43 CFR 8342.1 in making ORV area designation decisions..." BLM Manual 1626, Section 3. More generally, "[a]ll RMPs must contain a list of the criteria used to evaluate area designations and a preliminary set of those criteria that will be used to evaluate individual transportation linear features..." Id. at 3.3. Finally, BLM must publish in the RMP a map representing the known inventory of transportation linear features (routes) occurring on BLM-administered public lands. If this is not feasible, at a minimum, the RMP should describe a process and schedule to acquire the information necessary to establish a baseline transportation linear feature inventory for use in the travel and transportation management planning process. This inventory data should also include information regarding existing route authorizations or travel management decisions." Id. at 3.5. In evaluating the criteria at 43 CFR 8342.1 agencies have a substantive obligation to meaningfully apply and implement - not just identify or consider - the impact minimization criteria when designating each area or trail, and to show in the record how they did so. (1) (1) For example, see: WildEarth Guardians v. U.S. Forest Service, 790 F.3d 920, 929-32 (9th Cir. 2015) (Forest Service failed to "apply the minimization criteria to each area it designated for snowmobile use" on the Beaverhead-Deer Lodge National Forest and to provide the "more granular analysis [necessary] to fulfill the objectives of Executive Order 11644"). For a more detailed explanation of agency obligations related to these evaluative criteria, see: The Wilderness Society. 2016. Achieving Compliance with the Executive Order "Minimization Criteria" for Off-Road Vehicle Use on Federal Public Lands: Background, Case Studies, and Recommendations (Attached)	Specific route designations would be made in an implementation-level travel and transportation management planning process following the completion of the NCIP.
Flick	Pamela	I 10	Defenders of Wildlife	Best available science and information	We offer the following sources of information on the impacts of motorized and ORVs on the environment for consideration in preparing the final NCIP and EIS: Switalski, A. 2014. Snowmobile best management practices for Forest Service travel planning. A Comprehensive Literature Review and Recommendations for Management. Winter Wildlands Alliance, Boise, Idaho. <a href="https://winterwildlands.org/wp-content/uploads/2015/02/BMP-Report.pdf">https://winterwildlands.org/wp-content/uploads/2015/02/BMP-Report.pdf</a> Trombulak, S.C. and C.A. Frissell. 2000. Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities. Conservation Biology, Vol. 14 (1): 18-30. <a href="https://conbio.onlinelibrary.wiley.com/doi/pdf/10.1046/j.1523-1739.2000.99084.x">https://conbio.onlinelibrary.wiley.com/doi/pdf/10.1046/j.1523-1739.2000.99084.x</a> United States Government Accountability Office. 2009. Federal Lands: Enhanced Planning Could Assist Agencies in Managing Increased Use of Off-Highway Vehicles. <a href="https://www.gao.gov/assets/gao-09-509.pdf">https://www.gao.gov/assets/gao-09-509.pdf</a>	Thank you for bringing these reports to our attention. The BLM will consider this type of information in future project planning and implementation.
Flick	Pamela	I 10	Defenders of Wildlife	Consistency with other plans, laws, and regulations	In our analysis of the DEIS, we have identified several ways in which BLM has failed to comply with its policy and regulatory direction: - BLM does not show if and how it applied the ORV impact minimization criteria at 43 CFR 8342.1 to the designation of each ORV open and limited area; - BLM does not provide a list of the criteria used to evaluate area designations (in addition to the ORV minimization criteria) and a preliminary set of those criteria that will be used to evaluate individual transportation linear features; - BLM does not provide a map of linear features or at a minimum a plan for generating an updated travel feature inventory; and - BLM does not provide detailed information on prior travel management decisions or authorizations that exist.	This comment is beyond the scope of the RMP/EIS. Section D.3.7 of Appendix D, Travel and Transportation Management, contains a detailed presentation of Designation Criteria in Table D-78. The section also describes that the proposed plan would not close any of these preliminary routes. Future implementation level travel planning will establish a more definitive inventory of routes. .

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Flick	Pamela	I 10	Defenders of Wildlife	Consistency with other plans, laws, and regulations	<p>Instruction Memorandum 2023-005, Change I: Habitat Connectivity on Public Lands: The Proposed NCIP and EIS should incorporate the requirements of Instruction Memorandum (IM) 2023-005, Change I: Habitat Connectivity on Public Lands, dated 11/18/2022,(3) and its implementation guidance.(4) It responds to Interior Secretary Haaland's direction in 2022 for Interior agencies to update policies, identify and prioritize conservation and restoration of wildlife corridors and other lands and waters that protect habitat connectivity, permeability and resilience in partnership with state and Tribal wildlife managers and other stakeholders. (3)</p> <p><a href="https://www.blm.gov/policy/im-2023-005-change-I">https://www.blm.gov/policy/im-2023-005-change-I</a> (4)</p> <p><a href="https://www.blm.gov/sites/default/files/docs/2022-11/IM2023-05%2C%20ChangeI%20att2_0.docx">https://www.blm.gov/sites/default/files/docs/2022-11/IM2023-05%2C%20ChangeI%20att2_0.docx</a>, <a href="https://www.blm.gov/sites/default/files/docs/2022-12/IM2023-005_att1.pdf">https://www.blm.gov/sites/default/files/docs/2022-12/IM2023-005_att1.pdf</a> The IM directs BLM State and Field Offices to ensure that habitat connectivity, permeability and resilience is restored, maintained, improved and conserved on public lands. It requires State Offices to consult with state fish and wildlife agencies and Tribes to assess habitat connectivity and develop actions to manage public lands to protect and restore intact and connected habitats. Furthermore, it requires BLM to identify areas of habitat connectivity on public lands that support priority species movements and other ecological processes, such as seed dispersal, migrations and stopover sites. Initial assessment of connectivity habitats is to be completed within one year and based on priority habitats and areas of connectivity between them.The initial assessment is to be based on collaboration, coordination and consultation with Tribal and state wildlife managers, and other federal agencies. Consideration will be given to both linear connectivity, habitat permeability and resilience, and will incorporate reasonably foreseeable changes in species ranges, movement and migration. The IM requires habitat connectivity to be considered and analyzed in revisions to land use plans, such as the NCIP, including management actions in the alternatives that achieve the purpose and need of the IM.Actions may require designation of connectivity habitats as ACECs to provide for their protection as mandated under FLPMA.</p>	Proposed management direction under the action alternatives includes the promotion and prioritization of habitat connectivity, as described in Table B-1. Essential habitat connectivity corridors are detailed in maps contained in Appendix A of the document.
Flick	Pamela	I 10	Defenders of Wildlife	Livestock grazing	<p>We recommend a more in-depth analysis of the effects of livestock grazing on at-risk species and their habitats. Below we provide additional information for BLM to consider including in the final EIS. - Niederman, T.E. et al. (2023) published a comprehensive review of literature on the effects of livestock grazing that occurs on approximately 30 percent of land in the U.S.The information provided is intended to manage livestock grazing in a manner that sustains ecosystems, livelihoods and climate resilient landscapes. - Kaufman (2022). Climate change is expected to amplify the impacts of livestock grazing on at-risk species in the western U.S. Livestock remove native vegetation and litter; trample and compact soil and streambanks; pollute water through defecation and urination; spread invasive non-native plants; and increase surface water temperatures through alteration of riparian vegetation and streambanks. - Beschta et al. (2013) reported similar findings, noting that the effects of livestock on vegetation, soils, hydrology and wildlife species composition and abundance exacerbate the effects of climate change on these resources.The authors recommended removing or reducing livestock on public lands to eliminate or reduce the stress of livestock grazing and render habitats less vulnerable to the added effects of climate change. - Wilcove et al. (1998) quantified the effects of human activities on imperiled plants and animals in the U.S., including livestock grazing.They found that livestock grazing caused significant adverse impacts to 33 percent of plants and 14 percent of animals listed under the Endangered Species Act.</p>	Please refer Section D.3.8 for a detailed analysis regarding the impacts of each Alternative to Livestock Grazing within the planning area. Impacts to other resources as a result of changes to areas available to livestock grazing are outlined under each resource section in Appendix D.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Glass	Larry	I33	Safe Alternatives for our Forest Environment (SAFE)	Alternatives - general alternative comments	While we are in support of alternative B, we want to emphasize that fire resiliency is a very Important outcome that should be strived for in whatever alternative is adopted. It's important that the use of fire as a management tool incorporates indigenous knowledge and cultural burning tactics. We also believe strongly in continued work on fuel reduction without sacrificing shaded canopy. Specifically fuels work in conifer dominated forests should not reduce the canopy cover below 60% at the minimum. This does not include areas where the focus is oak woodland restoration or range enhancement. In all management tactics we would like to see an emphasis on small-scale and mosaic management plans that are specific to an area's ecology, rather than applying blanket management tactics to large-acreage areas. We appreciated BLM's commitment stated in Chapter 1 of the NCIP EIS, most notably "[m]anaging for diverse, ecologically resilient landscapes and healthy forests will be central to adapting to a changing climate." In order to meet these commitments we would like to see the NCIP adopt research and monitoring plans emphasizing conservation. In particular we would like to see the development of fire ecology studies within the BLM areas, in order to ensure that the RMP is meeting management goals. As stated in chapter 1.4, monitoring and evaluation are essential for an adaptive management approach that will ensure an effective RMP into the future. As ecosystems are forced to evolve to a changing climate, we would like to see public land agencies such as BLM be leading forces in developing and incorporating studies that ensure the most adaptive management tactics are being utilized. This should include consulting conservation and/or ecology specialists when developing management and fire resiliency plans.	The NCIP in Fire/ Fuels, Forestry, and Vegetation sections speak to long term monitoring of vegetation distributions, assessment of effects related to management actions, and evaluating changing vegetation communities in response to disturbance such as wildfire. The NCIP does not propose specific fire ecology studies to evaluate RMP effectiveness as this proposal would be most effective on a project or implementation level analysis.  The BLM employs ecologists, foresters, botanists, and fire managers who specialize in ecological process, productivity, and biodiversity on public lands as they relate to proposed management actions or large-scale disturbance. The NCIP is designed to give general guidelines for vegetation types but leave site specific treatments to the implementation level.
Glass	Larry	I33	Safe Alternatives for our Forest Environment (SAFE)	Consistency with other plans, laws, and regulations	Lastly, we would like to see the BLM work to develop a definition of "mature" and "old-growth forests" specific to the species present within the NCIP, in order to ensure management plans are implemented in accordance with Section 1 of the Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies, (EO 14072).	The BLM defers to the United States Forest Service definitions of mature and old-growth forest with regard to habitat requirements for Northern Spotted Owl (NSO). Scientific research and monitoring indicate spotted owls generally rely on mature and old-growth forests because these habitats contain the structures and characteristics required for nesting, roosting, and foraging. More information can be found in the 2011 Revised Recovery Plan for the Northern Spotted Owl, published by the US Forest Service and available at: <a href="https://www.fws.gov/sites/default/files/documents/NSO_RevisedRP_2011.pdf">https://www.fws.gov/sites/default/files/documents/NSO_RevisedRP_2011.pdf</a>
Glass	Larry	I33	Safe Alternatives for our Forest Environment (SAFE)	Consistency with other plans, laws, and regulations	SAFE encourages the BLM to commit to remain consistent with all locally approved plans and policies, Particularly in Trinity County where the will of the people for the last four decades has been very clear that they don't want chemical herbicides used as a management tool. We also encourage the BLM to integrate the Trinity County Community Wildfire Protection Plan into the NCIP.	Consistency with local land use plans is described in Section 1.6 of the RMP/EIS. Management common to all action alternatives includes consistency with existing local and regional land use plans and policies, including those relevant to land use planning in Trinity County.
Green	Mark	I13	N/A	Alternatives - lands and realty	The BLM should seek to acquire private lands from willing sellers to increase public ownership and resource protection in the Wild and Scenic River corridors.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Green	Mark	I13	N/A	Alternatives - new special designation nominations	I support National Wild and Scenic River protection for the Sacramento River and its tributaries, including Battle Creek, North Fork Battle Creek, South Fork Battle Creek, Inks Creek, Massacre Creek, unnamed Sacramento River tributaries 1 and 2, Paynes Creek, Turtle Creek, and Sevenmile Creek. The eligible segment of the Sacramento River should begin at Ball's Ferry and end at the stream gauge upstream of Red Bluff. Because they provide key migration corridors between Mt. Lassen and the Central Valley for fish, wildlife, and plants (particularly in response to climate change), an outstanding ecological value should be identified for the eligible/suitable segments of Battle Creek.	The Wild and Scenic Rivers Suitability Report has been updated to include a revision to ORVs identified. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Green	Mark	113	N/A	Alternatives - recreation	Off Road Vehicle use in the Bend area of the Sacramento River should be limited to existing trails to ensure a tranquil experience for hikers and floaters. Likewise, this area is inappropriate for target shooting, which should be banned in the ACEC and relocated elsewhere.	<p>OHV limited designations in the Proposed RMP/Final EIS are limited to existing routes until routes are designated in future implementation level travel management planning. Through this planning process, the BLM identified areas where OHV use should be limited or closed to prevent damage to resources.</p> <p>The BLM recognizes the concern related to recreational target shooting. Impacts to recreational users are discussed in Section D.3.6. The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts, by limiting shooting to designated areas only.</p>
Griffin	Simone	68	BlueRibbon Coalition	Air quality and climate change	One of the Air Resource Planning questions is, "How many miles of new roads would be created under each alternative that could result in increased potential for air pollution?" BRC believes with new technologies developing at an increased rate it is irresponsible for the BLM to believe a finite number of roads will increase air pollution and therefore set limitations that will direct the planning area for many years to come. This question should be eliminated from the planning process as every single motorized user could be using an electric motor.	Comment noted. It is not reasonable to eliminate consideration of new road construction for air quality impacts, given the potential for increased vehicle emissions and dust. It is reasonable to anticipate use of combustion engine vehicles on our roads for many years to come, even with increased use of electric vehicles. The potential emissions from new roads/vehicles should still be addressed and considered in the NCIP.
Griffin	Simone	68	BlueRibbon Coalition	Alternative C	BLM did not develop a plan that expands recreation access. Alternative C even has some level of closures and restrictions.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process. Alternative C favors community use broadly, including focusing on recreational access and recreational development. Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.
Griffin	Simone	68	BlueRibbon Coalition	Alternatives - general alternative comments	In addition to a recreation alternative, the BLM should consider developing an alternative that corrects the disturbing socioeconomic trends that are taking root in the Western communities that call the areas surrounded by the Redding and Arcata areas home.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process. Alternative C favors community use broadly, including focusing on recreational access and recreational development. Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.
Griffin	Simone	68	BlueRibbon Coalition	Alternatives - travel management	Any approach to management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the BLM consider the access needs of disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access.	In future implementation travel planning the BLM would consider expanding access where safe and appropriate.
Griffin	Simone	68	BlueRibbon Coalition	Alternatives - travel management	Expanding trail networks for all user groups, as well as new user groups such as ebikes, dispersed camping and overloading needs to be analyzed and incorporated into an alternative. Motorized access provides the best opportunities for those with disability access issues and the RMP is the best resource for the BLM to comply with the Equity Action Plan.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process. Alternative C favors community use broadly, including focusing on recreational access and recreational development. Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited. The Recreation section of the Proposed RMP/Final EIS strives to balance all recreational uses.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Griffin	Simone	68	BlueRibbon Coalition	Alternatives - travel management	<p>"User conflict" is an inappropriate and often misapplied concept that has generally been created and emphasized by anti-motorized advocates who are looking for any opportunity to restrict or eliminate motorized use. Despite their aggressive litigation efforts, there are few, if any, court decisions that have forced an agency to restrict any motorized recreation based on alleged "conflict." Rather, the courts have generally upheld a reasoned agency conclusion designed to address any alleged "conflict." See, e.g., Wild Wilderness v. Allen, 871 F.3d 719, 728-729 (9th Cir. 2017); Pryors Coalition v. Weldon, 803 F.Supp.2d 1184 (D. Mont. 2011), aff'd, 551 Fed.Appx. 426 (9th Cir. 2013). There are many strategies that can be employed to manage the ever-growing human population that desires to recreate in the planning area. We generally support the concept of "shared use." As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. There will always be a handful of pathologically disgruntled individuals seeking their own private rejuvenation on public lands. These outliers should not dictate policy or use designations, and should be handled in a similar way as children testing parental boundaries.</p> <p>Contrasted to those using "conflict" in a transparent effort to put a thumb on the scales of management balance, there are legitimate concerns that usually reflect the simple fact there are too many people trying to enjoy the same areas at the same time. These "conflicts" can occur within user groups or modalities as often as they occur between them. The agency should consider strategies to publicize and manage these situations. One option might be to designate non-motorized companion trails along motorized routes or designate/groom non-motorized only trails to Wilderness or non-motorized land classification to reduce conflict of uses. Such efforts might be coupled with a targeted information campaign to direct non-motorized uses to non-motorized land classifications. Another element might be to consider enhanced staging/parking for non-motorized users so as to provide better access to non-motorized areas. Finally, we have always been and remain strong advocates of an active and effective enforcement program, so that users who violate or choose to remain criminally ignorant of management prescriptions suffer meaningful adverse consequences. All users need to understand and respect the fact that their use of our public lands is a privilege to be shared with others under the terms established by applicable law.</p>	One way that the BLM has tried to address user conflicts and shared use in this plan is through designation of a variety of SRMAs and ERMAs to spread out different types of use and minimize user conflicts. The BLM's commitment to provide opportunities for different user groups can be found in goals and objectives in Table B-1, in the Recreation section.
Griffin	Simone	68	BlueRibbon Coalition	Best available science and information	<p>The Executive Order on Advancing Equity also recognizes that poverty and inequality can lead to systematic discrimination against historically underserved and marginalized communities. We strongly encourage the BLM to incorporate into their planning the findings of The Slums of Aspen: Immigrants vs. the Environment in America's Eden by Lisa Sun-Hee Park and David Pellow and Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West by Justin Farrell. Both of these works document extensively how Western communities surrounded by public land are undergoing significant socioeconomic changes that result in skyrocketing housing costs, use of conservation and land-use restrictions to limit development, and displacement of the local middle and lower classes from Western Communities.</p>	Thank you for your comment. The cited books are related to specific communities that are not the subject of this planning effort (i.e., Aspen, Colorado and Jackson, Wyoming) and do not necessarily reflect the issues of concern for the communities in the planning area. The discussion in the Socioeconomic section is framed to reflect the social and economic issues identified in project area specific socioeconomic workshops and public scoping.
Griffin	Simone	68	BlueRibbon Coalition	Environmental justice	<p>It should also be acknowledged that it is also entirely possible that many of the tribal members who wish to access sacred and cultural sites within the planning area currently or will at some point suffer from mobility impairment disabilities. Since the elimination of motorized access from the planning area would prevent disabled tribal members from accessing sacred and cultural sites, the motorized restrictions in an Alternative would likely be contrary to EO 13007, EO 13985, and AIRFA.</p>	Additional information has been added to Section D.5.2 of the EIS to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment, potentially including some members of Tribal communities.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Griffin	Simone	68	BlueRibbon Coalition	Social and economic conditions	The socioeconomic analysis should acknowledge the direct financial impact that will occur to organizations like ours if the agency were to adopt a alternative B or D.The Administrative Procedures Act is important to a planning process such as the development of this plan, because this statute makes it clear that agency actions that are both contrary to "the constitutional right, power, privilege, or immunity;" or "in excess of statutory jurisdiction, authority, or limitations, or short of statutory right must be held unlawful." The plan should acknowledge these important statutory and constitutional provisions.	As shown in Table B-I, OHV recreation opportunities would be preserved under all alternatives.The Travel and Transportation Management section notes that under all alternatives, the BLM would maintain 190 acres as open to OHV use in the Samoa Dunes SRMA.Travel routes and OHV use within the Samoa Dunes SRMA would continue along the same patterns and trends as currently occurring. Furthermore, the recreation section analysis states that under Alternative B, although there would be fewer opportunities, the vast majority of opportunity would continue to exist, in some cases with improved trails and management that could improve quality for OHV users. Therefore, the BLM anticipates that OHV use is not being significantly restricted under any alternative.The ability to perform quantitative analysis on economic impacts from these management changes, including use of the travel cost methods, is limited by the lack of identified changes to the level and type of recreation visitation use.
Griffin	Simone	68	BlueRibbon Coalition	Social and Economic Conditions	<p>We recommend that the BLM use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. In April 2022 the Department of Interior released its Equity Action Plan which states, "Public land visitation data collected from the Department's bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large." This includes persons with disabilities and limited physical access.</p> <p>On his first day in office, President Joe Biden issued an "Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government." This executive order established "an ambitious whole-of-government equity agenda" which focuses on addressing "entrenched disparities in our laws and public policies," and mandates a "comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality."</p> <p>Under this executive order, "The term 'equity' means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities...." Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.</p> <p>Management policies focused on "minimizing" the environmental impacts of motorized recreation has resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities.Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other "human powered" and "quiet use" forms of recreation in which many people with disabilities are unable to participate.</p> <p>Every time motorized routes or areas are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else.As a result, the BLM has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans.</p>	Additional information has been added to Section D.5.2 of the EIS to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Griffin (cont.)	(see above)	(see above)	(see above)	(see above)	The Biden Administration's focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM is therefore required by this executive order and others mandating that federal agencies consider "environmental justice" in NEPA proceedings to consider whether any route closures in the Northwest California Integrated Resource Management Plan would disproportionately harm disabled users' ability to access public lands.	(see above)
Griffith	Gary	141	N/A	Alternatives - new special designation nominations	Managing the Sac River Bend area as a Special Recreation Management Area (SRMA).	The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts by limiting shooting to designated areas only.
Griffith	Gary	141	N/A	Alternatives - recreation	Excluding target shooting within the Sac River Bend ACEC. Even confined to designated areas my experience is that they greatly impact wildlife and other recreational use due to their persistent, high decibel noise.	The BLM recognizes this issue. Impacts to recreational users and impacts on wildlife from target shooting are analyzed in Section D.3.6. The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts, by limiting shooting to designated areas only.
Guilbault	Charlie	84	N/A	Alternatives - new special designation nominations	After paddling Deer Creek for several years, I support the protection of the 8 mile section of Deer Creek. I support the continued management of Deer Creek as an ACEC for it's biological and cultural values. This area is shown on the BLM's 2017 Surface Management Map. The BLM should increase ownership of any available lands to increase protection of the Wild and Scenic River corridor. Please use all of your resources to help save the remaining natural river for future generations.	<p>The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable wouldn't meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.</p> <p>Protection of the Deer Creek as an ACEC appropriately addresses these values. One of the identified acquisition criteria in Table B- I . Land Tenure, is to acquire land in or nearby ACECs.</p>
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	Based on the whitewater recreation ORV and the critical role that BLM land along Deer Creek in the existence of this ORV, find Deer Creek to be suitable for inclusion in the National Wild and Scenic Rivers System. [IMAGE, p. 14: Deer Creek. BLM-managed land is in the center midground on both sides of the creek. Whitewater boaters camp on this land and a small area of BLM-managed land just upstream.]	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I. Protection of the Deer Creek as an ACEC appropriately addresses these values.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	Review designated Wild and Scenic Rivers to determine whether they possess additional ORVs. Update the information for the existing anadromous ORV to reflect the latest knowledge on the fishery resource and habitat needs. Update the resource management plan to properly protect and enhance these additional and updated ORVs on BLM-managed land.	The BLM is not re-evaluating 2(a)(ii) as part of this Plan. A future coordinated multi-agency effort could be appropriate.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	The BLM should check its information on proposed hydropower developments and correct the DEIS as necessary. If the BLM finds any active applications or permits for FERC projects on this segment or other segments evaluated in the DEIS, it should include the names and FERC project numbers for these projects in its references.	The BLM has used our best available data on proposed FERC projects in the DEIS.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	We urge the BLM to properly re-evaluate the Klamath River in Wards Canyon for its eligibility with its current free-flowing condition, to thoroughly evaluate all potential ORVS and to find this segment suitable. [PP. 7-10: PHOTOGRAPHS OF RIVER FEATURES: -Soaring colonnades of columnar basalt rise from the Klamath River in Wards Canyon. Everything in view is on BLM-managed land. -Late light in Wards Canyon, highlighting the blue heron rookery in the cottonwood tree and the convoluted columnar basalt walls. Everything in view is on BLM-managed land. Photo: Andy Marx via Instagram. -Whitewater rafter negotiating the rapids on the Klamath River in Wards Canyon. Everything in view is on BLM-managed land. -Removal of Copco 2 Dam began in June 2023 and was completed in October. The Klamath River's free-flowing condition through Wards Canyon is now restored. Photos: Shane Anderson/Swiftwater Films.]	At this time the BLM is not considering additional eligible segments. At a later date the BLM may conduct an eligibility of study of the Klamath River through BLM lands nearby the former Copco and Irongate dams. The BLM would support future interagency and Tribal efforts to assess the newly free-flowing sections holistically for inclusion in the WSR system, as stated in the Wild and Scenic River Klamath River section of Table B- I .

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	For the BLM, the NCIP planning process is the appropriate venue to analyze these rivers for additional ORVs and possible re-classification via the NEPA process. Table 2 describes our proposed additional ORVs for these rivers and their WSR-designated tributaries. Table 2: List 2(a)(ii)-designated rivers and proposed additional ORVs. Designated River or Complex: Klamath Update Existing ORV(s): Anadromous fish Proposed Additional ORV(s): Scenery, recreation, culture Designated River or Complex: Trinity Update Existing ORV(s): Anadromous fish Proposed Additional ORV(s): Scenery, recreation, culture, history Designated River or Complex: Middle Eel Update Existing ORV(s): Anadromous fish Proposed Additional ORV(s): Scenery, recreation, culture Designated River or Complex: North Fork Eel Update Existing ORV(s): Anadromous fish Proposed Additional ORV(s): Scenery, recreation, culture Designated River or Complex: South Fork Eel Update Existing ORV(s): Anadromous fish Proposed Additional ORV(s): Scenery, recreation, culture, botany Designated River or Complex: Eel (mainstream) Update Existing ORV(s): Anadromous fish Proposed Additional ORV(s): Scenery, recreation, culture, history, geology	The BLM is not re-evaluating 2(a)(ii) as part of this Plan. A future coordinated multi-agency effort could be appropriate.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	Because the BLM lacks statutory authority to make suitability determinations for rivers it has identified as Wild and Scenic eligible, we request that it remove such determinations from the final EIS and ROD, in compliance with the law. Notwithstanding this position, our comments will address BLM's suitability determinations as part of its current proposed action.	It is out of the scope of this planning effort to reinterpret guidance provided in BLM Manual 6400. No change has been made. Section 5(d)(1) of the WSRA states, in part, "The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved." The BLM evaluates rivers for possible inclusion in the National WSR System under Section 5(d)(1) of the WSRA, following policy guidance in BLM policy manual 6400, Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, Planning, and Management (2012).



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 1: The BLM does not have statutory authority to make suitability determinations for rivers and streams that it has identified as eligible for inclusion in the National Wild and Scenic Rivers System. Consequently, it should not be making suitability determinations via this resource management plan process.</p> <p>The Wild and Scenic Rivers Act requires BLM to consider potential additions to the National Wild and Scenic Rivers System, but it does not provide BLM with the authority to make suitability determinations for rivers it has determined to be Wild and Scenic eligible. In its Revised Wild and Scenic Rivers Eligibility Report for the NCIP, the BLM correctly cites section 5(d)(1) of the Act as requiring the agency to consider "potential national wild, scenic, and recreational river areas" in its land management planning. However, Manual 6400 (Wild and Scenic Rivers-Policy and Program Direction for Identification, Evaluation, Planning, and Management - BLM 2012) incorrectly interprets other sections of the Act, creating a process whereby BLM determines the "suitability" of rivers and streams it has found to be Wild and Scenic eligible. There is no express authorization in section 5(d)(1) for the BLM to conduct suitability determinations. In fact, section 5 of the Act is titled, "Rivers constituting potential additions to the national wild and scenic rivers system" and subsection 5(d) is titled "Continuing consideration by Federal agencies to potential national, wild, scenic and recreational river areas" (emphases added). Nowhere in the Act is there express Congressional direction for the agency to evaluate eligible rivers and pare down the list the rivers to those it deems "suitable" for Congressional designation. Section 4(a) of the Act directs that the Secretary of Interior or Agriculture "shall study and submit to the President reports on the suitability or nonsuitability for addition to" the System "of rivers which are designated herein or hereafter by the Congress as potential additions to such System" (emphasis added). The BLM has long misinterpreted this, believing it is authorized to perform suitability determinations for rivers it has identified as Wild and Scenic eligible under its section 5(d)(1) obligation, a practice incorporated into Manual 6400. However, the clear wording of section 4(a) of the Act limits the BLM to reporting on suitability or nonsuitability to rivers that Congress, not the BLM, has identified as potential additions to the National Wild and Scenic Rivers System.</p> <p>With one limited exception, the Act does not provide the BLM with authority to make suitability determinations for rivers other than those identified by Congress. The exception, in section 5(d)(2), specifically applies to the Klamath River, adjacent to and upstream of the NCIP planning area. Here, Congress authorizes the BLM to complete a study of eligibility and suitability for a river previously identified by the BLM (via the Secretary of Interior) as Wild and Scenic eligible. Beyond this instance, Congress has never authorized a federal land management agency to complete a study that includes a suitability determination for an agency-identified eligible river.</p>	<p>The NCIP has followed the process outlined in BLM policy in Manual 6400. It is out of scope of the NCIP to reinterpret guidance provided in BLM Manual 6400. No change has been made. Section 5(d)(1) of the WSRA states, in part, "The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved." The BLM evaluates rivers for possible inclusion in the National WSR System under Section 5(d)(1) of the WSRA, following policy guidance in BLM policy manual 6400, Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, Planning, and Management (2012).</p>
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 2: The segment of the Klamath River that flows through BLM-managed land in Wards Canyon is newly free-flowing, contains several outstandingly remarkable values, and it should be re-evaluated under its current status and found Wild and Scenic eligible and suitable.</p> <p>The BLM inventoried the segment of the Klamath River segment flowing through BLM-managed land in Wards Canyon near Copco, California, but determined it was ineligible (Revised WSR Eligibility Report, Table 2-3, p. 2-17). (1 The geographic center of this river segment is 41.9816035°, -122.3547073°, and it is identified with OBJECTID = 11097 in the BLM's WSR_Inventoried_Rivers in the ARWSR_GIS.gdb dataset.) The report contains no reasoning or basis for this determination. However, it seems likely that BLM staff determined that the near-complete diversion of the Klamath River's flow at the Copco 2 Dam located one mile upstream disqualified this segment on the basis that it was not a free-flowing river.</p>	<p>At this time, the BLM is not considering additional eligible segments. At a later date the BLM may conduct an eligibility study of the Klamath River through BLM lands nearby the former Copco and Irongate dams. The BLM would support future interagency and Tribal efforts to assess the newly free-flowing sections holistically for inclusion in the WSR system, as stated in the Wild and Scenic River section of Table B-1.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding (cont.)	Scott	66	(see above)	(see above)	<p>In 2023, the Klamath River Renewal Corporation fully removed Copco 2 Dam, ending all diversion and restoring flows to the Klamath River downstream. (2. See press release, Work on Copco No. 2 Dam Removal Comes to a Close (November 2, 2023 <a href="https://klamathrenewal.org/work-on-copco-no-2-dam-removal-comes-to-a-close/">https://klamathrenewal.org/work-on-copco-no-2-dam-removal-comes-to-a-close/</a>). The river now flows freely through Wards Canyon, including BLM-managed lands, and clearly possesses a free-flowing condition. The BLM should now evaluate it for the presence of outstandingly remarkable values, of which there are several.</p> <p>This reach of the river flows through BLM-managed land at the deepest depths of a remote, spectacular canyon. The river makes a sharp left turn around a prominent rock outcrop that holds great spiritual significance to the Shasta people. A massive blue heron rookery fills a cottonwood tree at the base of the outcrop. On the right, soaring colonnades of columnar basalt rise vertically in cliffs carved by the river, creating a spectacular panoramic display of uniquely patterned rock. All of this is on BLM-managed land.</p> <p>The whitewater boating on the Klamath River through Wards Canyon is exceptional and unique, offering a year-round class IV whitewater experience in a region where all other free-flowing rivers of comparable quality and difficulty only flow at boatable levels for portions of the year. A whitewater boating study was conducted in 2020 as part of the environmental analysis for the dam removal project. The study evaluated the specifics of whitewater boating in Wards Canyon following dam removal and utilized special flow releases from Copco 2 Dam, then still in place, to allow a team of boaters to navigate the river through the canyon under varying flow conditions to determine its qualities. The report details the exceptional nature of the whitewater in Wards Canyon and notes how it is anticipated to be a very popular whitewater run following dam removal.</p> <p>"Previously unboatable due to restricted access and very low bypass flows, Ward's Canyon will provide an exciting new whitewater boating opportunity. The segment has the best scenery of the Upper Klamath River, in a narrow canyon with elaborate columnar basalt displays and good wildlife viewing, and it feels isolated despite its two-mile length. With drawdown, dam removal, and access at Copco Valley, the segment will include another mile of river with whitewater. Regardless of eventual length, Ward's Canyon currently has several fun-but-not-scary Class III/IV rapids, and they will be boatable at low summer flows of 800 to 1,100 cfs in the segment. Close to the I-5 corridor along mostly paved roads, the segment has the easiest access of any Upper Klamath run, and an efficient shuttle road out of sight and sound of the river allows multiple runs in a day." -Final Whitewater Boating Study Study Report, Lower Klamath River Project (FERC No. 14803), pages 56-57 (3. The full whitewater boating study is available here: <a href="https://drive.google.com/file/d/1hbQEArZZRvHK4jZWetEqLVr6Chgkueb9/view?usp=share_link">https://drive.google.com/file/d/1hbQEArZZRvHK4jZWetEqLVr6Chgkueb9/view?usp=share_link</a>)</p> <p>Additionally, dam-related in-stream hazards were removed from the Klamath River in Wards Canyon as part of the Copco 2 Dam removal process. Consisting of trees and vegetation that had unnaturally grown directly in the river channel during the 98 years it was dewatered by the dam, the removal of these hazards has improved the whitewater boating recreational resource and prepared this section of river for safe use by boaters and outfitters.</p> <p>In 2024, the remaining three hydropower dams on the Klamath River will be removed. This is the largest dam removal project ever undertaken in the world and is significant not only for the restoration of the river and its fishery but for its historical context. The segment of river in Wards Canyon was one of the first to be impacted by hydropower development in the early 1900s and it is the first to be returned to its original state via dam removal. With no road or trail access, this river segment appears wild and untouched by humans, and boat access is the only viable way to reach the depths of the canyon and the BLM-managed land. It fits the criteria for a wild or scenic classification:</p> <ul style="list-style-type: none"><li>- Free of impoundment and diversion (as of removal of Copco 2 Dam in 2023)</li><li>- Undeveloped shoreline with no evidence of human activity</li><li>- Inaccessible except by whitewater boat or off-trail travel</li><li>- Water quality is improving with removal of upstream dams and reservoirs</li></ul>	(see above)

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding (cont.)	Scott	66	(see above)	(see above)	<p>Potential outstandingly remarkable values for the segment of the Klamath River through BLM-managed lands in Wards Canyon are shown in Table I. This is not an exhaustive list, and other ORVs are likely present.</p> <p>Table I: Summary of ORVs, Klamath River in Wards Canyon (BLM-managed lands) [Table has been copied and pasted below]</p> <p>Scenery: This segment has exceptional scenic qualities including panoramic views of soaring columnar basalt colonnades located on a sweeping bend around a prominent rock outcrop. The columnar basalt, uniquely starburst-patterned, creates a display unparalleled on the Klamath River or elsewhere in the region.</p> <p>Recreation: The river provides year-round class IV whitewater boating in a scenic canyon that is readily accessible by boat. Exceptionally unique as a "new" whitewater run made possible by Klamath River dam removal, it is expected to be very popular with boaters and outfitters seeking alternatives to the popular Hells Corner Run (IV) upstream, which previously depended on dam-release flows that no longer occur.</p> <p>Wildlife: Virtually untouched and unvisited, the river is home to a massive blue heron rookery, mink, and other river-dependent wildlife. The concentration of wildlife is exceptional, even for a river like the Klamath and the riparian habitat is uniquely untouched by humans due to 98 years of access prohibitions that were part of the Klamath Hydropower Project (now removed).</p> <p>History: This segment of river attracted some of the earlier hydropower developments in California, with two dams immediately upstream and a third dam downstream. Hydropower use dominated the river for a century but the historic removal of these dams is underway- the largest dam removal project ever undertaken in the world- ushering in a new era and making history. This is already drawing visitors from outside the region and nation.</p> <p>Culture: Wards Canyon has a long and ongoing history of use by Native American peoples. Numerous Shasta Indian cultural sites and resources are present. The canyon and its prominent rock outcropping located on BLM-managed land, K'úć'áwa?k, continue to hold the utmost significance as the spiritual center of the Shasta world. Evidence of visitation and use by other Tribes exists along the river.</p> <p>Following the BLM's Manual 6400 procedures, this segment should also be determined to be suitable for inclusion in the National Wild and Scenic Rivers System.</p> <p>Although the river segment only flows through 0.3 miles of BLM-managed land, all of the ORVs listed above are present on this land and no other agency or entity is able to manage the land for their protection. The BLM found the adjacent upstream segment of the Klamath River (JC Boyle Dam to Copco Lake) eligible and suitable in 1990, and the adjacent downstream segment (Iron Gate to Pacific Ocean) is designated as a National Wild and Scenic River. The BLM already manages both of those segments, so it follows that it has the capacity to manage the Wards Canyon segment in between.</p> <p>Additionally, the Klamath River is undergoing a massive dam removal project, yet only a Wild and Scenic River designation that includes the Wards Canyon segment can assure that a future dam will not be authorized on this reach, undoing the gains accomplished through Klamath dam removal. Only the BLM can find this segment eligible and suitable, setting it up for future designation by Congress and ensuring that the current Klamath dam removal and river restoration efforts are enduring and not just a step towards a future re-damming of the river.</p> <p>The entirety of non-federal lands in Wards Canyon are currently owned by the Klamath River Renewal Corporation and, under the terms of the 2016 Amended Klamath Hydropower Settlement Agreement, the State of California will assume ownership and management of these lands following dam removal in 2024 with the requirement to manage them "for public interest purposes such as fish and wildlife habitat restoration and enhancement, public education, and public recreational access." (4. See section 7.6.4 of the 2016 Amended Klamath Hydropower Settlement Agreement, p. 46, available at</p>	(see above)

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding (cont.)	Scott	66	(see above)	(see above)	<a href="https://klamathrenewal.org/settlement-agreements/">https://klamathrenewal.org/settlement-agreements/</a> .) The California Department of Fish and Wildlife will protect the outstanding values on its land in the canyon when it assumes management in 2024, but only the BLM can protect the significant ORVs on the federal land in the canyon. Finding the river eligible and suitable is a necessary step to ensuring adequate federal protection.	(see above)
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 3:The suitability determination for Butte Creek I Segment A (Sacramento River) contains two errors that should be corrected, and the suitability determination should be re-assessed using corrected information and a broader view of BLM's role in protecting ESA-listed species in this segment.</p> <p>First, there is an error in the suitability determination for this segment. In the discussion of Factor 12 (Appendix G, p. 3-34), the DEIS refers to Coleman Creek rather than Butte Creek: "Coleman Creek contains a minimal amount of BLM-administered lands within its segment corridor and contains fragmented pieces at best." This should be corrected to provide information specific to Butte Creek I Segment A. Second, in the discussion of Factor 3 (Appendix G, p. 3-32) and Factor 13 (p. 3-34), the DEIS states that there are currently two FERC dam or diversion projects proposed for this river segment. We thoroughly searched FERC records on November 26, 2023 and were unable to locate any active applications or preliminary permits for proposed hydroelectric dams or diversions along this segment of Butte Creek or any other segment of Butte Creek.As such, it appears that the information in the DEIS may be incorrect.</p> <p>Additionally, the BLM should take a broader view on its role in protecting the ESA-listed species in this segment and how its determination of suitability aids significantly in this protection.Although this segment is short and there is a low proportion of BLM-managed land in the river corridor, a Wild and Scenic River designation would nonetheless significantly aid in the protection and enhancement of ESA-listed fish populations and habitat.</p> <p>Previously, Butte Creek has faced threats from dam and diversion projects that would harm ESA-listed species. The Wild and Scenic Rivers Act, aimed at preserving streams like Butte Creek, is the sole federal law protecting such rivers from these developments.Although the BLM's jurisdiction over Butte Creek is limited, its eligibility and suitability determinations are crucial for future Wild and Scenic designation.This designation is vital for the recovery of endangered species, safeguarding their habitats from the impacts of new dams and diversions, including those along Butte Creek.</p>	Updates have been made to the Wild and Scenic River Suitability Report to reflect these comments.The BLM recognizes the regional importance of Butte Creek I Segment A; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details in Appendix I. The Factor 12 error has been corrected.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 4:The suitability determination for Butte Creek (Sacramento River) Complex (Butte Creek I Segment B, and West Branch Butte Creek I) incorrectly states that there are proposed dams or diversions on Butte Creek.</p> <p>In the discussion of Factor 3 (Appendix G, p. 2-12), the DEIS states that "there are two applications for dams or diversions on file for this river; however they would be located outside of the WSR segment boundary." We thoroughly searched FERC records on November 26, 2023 and were unable to locate any active applications or preliminary permits for proposed hydroelectric dams or diversions anywhere along Butte Creek.As such, it appears that the information in the DEIS may be incorrect.</p>	Updates have been made to the Wild and Scenic River Suitability Report to reflect your comments.The BLM recognizes the regional importance of Butte Creek I Segment A; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details in Appendix I. The Factor 12 error has been corrected.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 5: It appears that not all portions of the Mad River within BLM-managed lands were evaluated for Wild and Scenic eligibility, and for those portions that were evaluated, the BLM did not recognize the outstandingly remarkable value for whitewater recreation.</p> <p>Portions of the Mad River that flow through BLM-managed lands were first paddled in the early 1970s and documented in Dick Schwind's 1974 seminal guidebook, West Coast River Touring<sup>5</sup>. The outstanding recreation resources of the Mad River have been recognized ever since, and more recently boaters have ventured into the "Grand Canyon of the Mad River," the reach between Highway 36 and the river access at Jack Shaw Road approximately thirty miles downstream. This reach has stunning Coast Range scenery, challenging rapids, and it offers a rare opportunity for boaters seeking an overnight or multi-day river trip in Northwestern California. It is sought after by locals and visitors alike and is detailed in The New School Guide to Northern California Whitewater by Dan Menten (2016). However, the BLM does not recognize this segment's whitewater recreation as an outstandingly remarkable value.</p> <p>5. Available for download from American Whitewater, see pages 125-128. <a href="https://www.americanwhitewater.org/content/Document/fetch/id/1456/raw">https://www.americanwhitewater.org/content/Document/fetch/id/1456/raw</a></p> <p>In fact, review of the BLM's NCIP GIS data indicates that most of the mileage of the Mad River that is on BLM-managed land was not evaluated for its Wild and Scenic eligibility. This can be visualized in the GIS data by looking at the WSR_Inventoried_Rivers layer and the NCIP_RMP_DecisionArea layer: a significant portion of the Mad River within BLM-managed lands is not shown as having been inventoried. The entirety of the Mad River is enjoyed by whitewater boaters and is recognized as offering some of the finest whitewater in the region.</p>	<p>The BLM included all segments of the mainstem Mad River that intercept BLM lands. See map showing four segments in Eligibility Report. We recognize the recreation ORV and have added it to the Suitability Report. However, we maintain the conclusion that these reaches are not suitable for inclusion, and BLM is not able to manage the 30-miles referenced in the comment. However, the ORVs on BLM-managed lands will be protected through other mechanisms such as the Clean Water Act and Endangered Species Act.</p>
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 6: It appears that Antelope Creek (east of Red Bluff) was not evaluated for Wild and Scenic eligibility.</p> <p>Review of the BLM's NCIP GIS data indicates that Antelope Creek, a free-flowing stream approximately eight mile ENE of Red Bluff, was not evaluated for its Wild and Scenic eligibility. [IMAGE OF ANTELOPE CREEK] This can be visualized in the GIS data by looking at the WSR_Inventoried_Rivers layer and the NCIP_RMP_DecisionArea layer: the portions of Antelope Creek within BLM-managed lands are not shown as having been inventoried.</p> <p>Antelope Creek is enjoyed by whitewater boaters and, with a 19.5-mile-long boating run, it is recognized as offering one of the best long day or overnight boating trips in the region. It clearly possesses an outstandingly remarkable value for whitewater recreation.</p>	<p>Antelope Creek was not included because the BLM determined there was no intersection of BLM land with the stream.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 7: The BLM should determine that Deer Creek is suitable for inclusion into the National Wild and Scenic Rivers System.</p> <p>The BLM has recognized that Deer Creek possesses scenery, recreation, and fish ORVs and has a tentative scenic classification. Even though the BLM recognizes that Wild and Scenic designation would provide protection and enhancement of these ORVs, it does not find Deer Creek to be suitable for inclusion in the National Wild and Scenic Rivers System because "the percentage of BLM-managed lands within the corridor is minimal, fragmented, and would not provide adequate access for management of ORVs" (DEIS Appendix G, p. 3-64).</p> <p>While true that BLM manages a small portion of the Deer Creek corridor, the BLM-managed land provides whitewater boaters the only opportunity to camp on public land while boating this 23.7-mile-long overnight run. Without this camping opportunity, boaters would be forced to trespass on private land or compromise their safety and the overnight boating experience to attempt to push through this long class IV-V run in a single day. The suitability determination did not consider this aspect: the whitewater ORV is completely dependent upon the small amount of BLM land along the creek. Wild and Scenic River designation will ensure that this BLM land is managed to protect the whitewater ORV, and the BLM should find this segment suitable for this reason.</p>	The Plan does not limit dispersed camping in this area, and the Deer Creek ACEC will protect the scenery and fish values.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Comment 8: The BLM should evaluate 2(a)(ii)-designated Wild and Scenic Rivers to determine whether they possess additional ORVs.</p> <p>Nearly all federally designated Wild and Scenic Rivers in Northwest California were added to the National Wild and Scenic Rivers System in 1981 via the 2(a)(ii) designation pathway. Also known as the Secretarial Determination, this designation pathway essentially copies an existing state designation into the National Wild and Scenic Rivers System upon request of the state's governor and approval of the Secretary of the Interior. When this occurred in 1981 for rivers in Northwestern California, the state's single ORV for anadromous fisheries became the single ORV in the federal designation as well, without any consideration of whether the rivers possess additional ORVs. No federal agency has ever conducted a systematic evaluation of these rivers to determine what additional ORVs they may possess.</p>	The BLM is not re-evaluating 2(a)(ii) as part of this Plan. A future coordinated multi-agency effort would be appropriate.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Correct errors in the suitability determination and re-evaluate suitability using the corrected information and a broader view of the importance of a suitability determination for the protection of ESA-listed species that constitute the identified ORV for Butte Creek I Segment A.</p> <p>If the BLM finds any active applications or permits for FERC projects on this segment or other segments evaluated in the DEIS, it should include the names and FERC project numbers for these projects in its references.</p>	Updates have been made to the Wild and Scenic River Suitability Report to reflect your comments. The BLM recognizes the regional importance of Butte Creek I Segment A; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details in Appendix I. The Factor 12 error has been corrected.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	Evaluate Antelope Creek for its Wild and Scenic eligibility, whitewater recreation ORV, and other ORVs. Find the creek eligible and suitable for inclusion in the National Wild and Scenic Rivers System.	Antelope Creek was not included because the BLM determined there was no intersection of BLM land with the stream.
Harding	Scott	66	American Whitewater	Appendix G: Draft Wild and Scenic River Suitability Report	Re-evaluate all portions of the Mad River for Wild and Scenic eligibility, adding whitewater recreation as an outstandingly remarkable value. With additional eligible segments and ORVs, find the Mad River as suitable for inclusion in the National Wild and Scenic Rivers System.	The BLM recognizes the recreation ORV and have added it to the Suitability Report. However, the BLM maintains the conclusion that these reaches are not suitable for inclusion.
Hayward	Kristian	85	N/A	Alternatives - lands and realty	The BLM should acquire private lands from willing sellers in order to expand public ownership and protect these resources, especially as a migration corridors for various species, which are increasingly threatened in the face of climate change. When the opportunity to acquire and protect segments as pristine and historic as the aforementioned section of Deer Creek arises, the BLM should take action and secure these natural resources for today's and tomorrow's generations.	BLM acquisition criteria can be found in Table B-1, Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Hoover	Vicky	55	N/A	Alternatives - new special designation nominations	The decision area has more than a hundred eligible streams for which recommendation for Wild & Scenic River status would be extremely helpful--these are streams such as Butte, Clear, Paynes, Beegum, Indian and West Weaver Creeks in the Sacramento and Trinity River watersheds, and Cedar, Hulls, Elk Creeks in the Eel watershed, and Lacks Creek, flowing into Redwood Creek. Riparian corridors along these waterways definitely need to be included in the protection. Where such riparian corridors are privately owned, their acquisition via Land & Water Conservation fund moneys or other newer 30x30 grants should be made a high priority.	All of the listed segments are identified as suitable. Suitable segments would be managed with a 0.25-mile buffer to protect free flowing nature, water quality, and ORVs as described in Table B-I and the Wild and Scenic Rivers Suitability Report. Additionally, one of the identified acquisition criteria in Table B-I is to acquire land in or nearby WSRs.
Huff	Christina	72	Friends of the Lost Coast	Alternative D (preferred alternative)	Friends of the Lost Coast does, however, see opportunities to strengthen the conservation management prescriptions for local lands and waterways that are not presently included in the preferred alternative - and request BLM to adopt the alternative B recommendations for 5840 acres of Gilham Butte as a 202 WSA and include segments of the Mattole River and five important tributaries - Eubank Creek, Grindstone Creek, Sholes Creek, NF Fourmile Creek, and Fourmile Creek - as WSRs. Our reasoning is outlined below - along with some additional comments regarding other BLM lands in the larger Lost Coast region. Gilham Butte is a holding that is critically important to the Lost Coast from an ecological perspective. While considered landlocked from public access, the wild character and biological value of this holding is well known and local efforts to conserve and protect Gilham Butte go back more than 3 decades. 2500 acres of the present holdings were designated as both an ACEC and LSR in the 1994 NW Forest Plan. While these designations are significant, the larger 5840 LWC-appropriate acres of the Gilham Butte holding are equally worthy of such recognition, checking all the boxes to warrant the highest level of conservation management as a WSA. The outstanding natural resources found here include abundant old growth forest (including outside of the existing LSR) and prime conditions for northern spotted owl, marbled murrelet, and other threatened species that depend on old growth forest habitat. Gilham Butte is also an important wildlife corridor, essentially connecting Humboldt Redwoods State Park and the Bull Creek State Wilderness to the north and King Range National Conservation Area/King Range Wilderness to the south and west. With regard to Humboldt Redwoods State Park, Gilham Butte's LWC-appropriate acres directly border state park property, providing incredible potential for public recreational access via an expansive trail system that exists in Humboldt Redwoods State Park.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-I for Section 202 WSAs and WSRs.
Huff	Christina	72	Friends of the Lost Coast	Alternatives - lands and realty	Concerning recent acquisitions in NW CA that are not included or referenced in the DEIS, specifically the tract in northern Mendocino County known as Lost Coast Redwoods, Friends of the Lost Coast request BLM conduct an assessment of these newly acquired lands under NCIP and manage them to keep mature trees and to regrow ancient forests for the future. We also request the same for BLM's new acquisition south of Guthrie Creek in the Lost Coast Headlands - and recommend managing this parcel in a manner consistent with the larger Lost Coast Headlands holdings that it is adjacent to. These are exciting and valuable additions to the public lands of NW CA - and FOLC wholeheartedly encourages BLM to continue to increase its holdings in the vicinity of these areas and all stated lands and waterways referenced in the NCIP DEIS.	Acquired lands would be managed similarly to adjacent BLM-administered lands unless the BLM determines specific management needs unique to those acquired lands. Management direction for these properties will come from the 'coastal strip' management direction (see Coastal Resources Management). All forest lands in the NCIP will be managed to protect late-seral characteristics. Implementation -level planning for acquisitions would be completed after lands are acquired. The public will have the opportunity to participate in this separate planning effort.
Huff	Christina	72	Friends of the Lost Coast	Alternatives - lands and realty	FOLC also recommends that continued acquisitions occur to expand the Gilham Butte holdings and further build out the Redwoods To The Sea Corridor.	BLM acquisition criteria can be found in Table B-I, Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Huff	Christina	72	Friends of the Lost Coast	Alternatives - special designations	With regard to WSRs in the Lost Coast region, Friends of the Lost Coast encourages BLM to move all Mattole River segments and tributaries listed in Alternative B to the preferred alternative. These include segments of Grindstone Creek, Sholes Creek, Eubank Creek, NF Fourmile Creek, and Fourmile Creek, totaling 14.7 miles, 2.7 of which flow through BLM land. In addition to the outstanding scenic and/or wild characteristics of these streams, they also provide outstandingly remarkable anadromous fish value and are crucial in supporting healthy flows in the Mattole River. Though WSR designation is strongly encouraged, because of statewide interest in conserving the Mattole River watershed, the BLM - at a minimum - should retain eligibility of the Mattole segments and these tributaries to maintain interim protection of the fish values.	The BLM recognizes the regional importance of the Mattole River and its tributaries as mentioned in the Gilham Butte ACEC and Upper Mattole ACEC Table B-I. Additionally, the BLM has determined current federal and state laws provide protection to this area and protect the ORVs.
Huff	Christina	72	Friends of the Lost Coast	Alternatives - visual resources	Various conservation acquisitions and easements in this area over recent decades comprise what is known as the Redwoods To The Sea Corridor, a statewide identified Essential Corridor of High Biological Value. Backpackers, equestrians, and trail enthusiasts have long dreamed of a Redwoods To The Sea Trail through this corridor. A trail system like this would be an outstanding recreational asset, connecting the largest tract of contiguous old growth redwoods anywhere in the world to the longest stretch of coastal wilderness in the lower 48 states - with the wild lands of Gilham Butte in between. Not only would this visionary project allow public access to Gilham Butte, it also has the potential to be a major economic driver, drawing tourists to an otherwise depressed economic region that is increasingly looking to public lands and outdoor recreation for economic sustainability. Because of this potential, and the larger wilderness characteristics present at Gilham Butte, not only would WSA designation be appropriate for the LWC-recommended acres, but an upgraded VRM to no less than level 2 should also be adopted for the entirety of the Gilham Butte holdings to protect its outstanding scenic qualities.	Some ACECs vary in VRM class responding to their respective R&I values. An R&I value for Scenic Quality would have a more conservative VRM class. VRM classes within ACECs may also vary based on other special designations that may overlap the ACEC boundary. For the proposed Gilham Butte ACEC of 9,330 acres it is a VRM Class III. However, 5,840 acres is proposed as VRM Class II because those lands are also lands with wilderness characteristics managed to protect wilderness as a priority, which are to be managed as VRM Class II. Therefore, 5,840 acres of Gilham Butte ACEC would be managed as VRM II, while the remainder of the proposed expanded ACEC, would be managed as VRM Class III.
Hughes	Howard	139	N/A	Social and economic conditions	The increasing restrictions on motorized access to public lands are inequitable to people that have disabilities or families with young children.	Additional information has been added to Section D.5.2 of the EIS to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment.
Hunter	Priscilla	52	InterTribal Sinkyone Wilderness Council	Alternative D (preferred alternative)	Sinkyone Council requests BLM to prioritize the highest level of conservation management in the final plan, including: 1) Managing Cahto Peak, Camp St. Michel, Chappie-Shasta, Grass Valley South, and Sacramento River Bend as lands with wilderness characteristics (LWCs); 2) managing English Ridge, Gilham Butte, Trinity Alps, Red Mountain, and Yolla Bolly as wilderness study areas (WSAs); and 3) designating Eden Valley, North Fork Eel, Beegum Creek Gorge, Deer Creek, Gilham Butte, Grass Valley Creek, Sacramento River Bend, Shasta and Klamath River Canyon, Upper and Lower Clear Creek, Mattole River, and Willis Ridge as Areas of Critical Environmental Concern.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-I, beginning row 333 for WSAs, row 323 for WSRs, and row 347 for Lands with Wilderness Characteristics managed as a priority over other uses, and row 250 for ACEC.
Hunter	Priscilla	52	InterTribal Sinkyone Wilderness Council	Alternative D (preferred alternative)	We thank you for crafting the draft NCIP with so many lands and waters proposed for protection. We strongly urge you to improve the final version of the NCIP by protecting all of the most natural and "wild" remaining BLM parcels in the region in as strict a fashion as possible while allowing non-detrimental recreation activities to continue.	The BLM recognizes the regional importance of Deer Creek and Mill Creek (particularly for fisheries and recreation), however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable wouldn't meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Hunter	Priscilla	52	InterTribal Sinkyone Wilderness Council	Consistency with other plans, laws, and regulations	Please see the Tribal Leaders Statement on 30x30, an initiative that Department of the Interior Secretary Deb Haaland helped convene, and which we and others are signatory to: <a href="https://www.nafws.org/wp-content/uploads/2021/03/FINAL-Tribal-Leader30x30-Statement-5.6.21.pdf">https://www.nafws.org/wp-content/uploads/2021/03/FINAL-Tribal-Leader30x30-Statement-5.6.21.pdf</a>	<p>BLM acknowledges Tribal Leaders and Tribal organization leaders' expressed support for the Biden Administration's Thirty by Thirty (30x30) initiative to set a goal for the United States to protect and conserve at least 30% of oceans and lands by 2030. The America the Beautiful Initiative and the California 30x30 initiative (see Section 1.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider "conserved." Table 1-2 in Chapter 1 of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table 1-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>
Hunter	Priscilla	52	InterTribal Sinkyone Wilderness Council	Tribal consultation and coordination	<p>Because we share the responsibility of caring for nature, we ask the BLM to respect Tribes' cultural-spiritual ways of life that have ensured, and continue to ensure, the protection of the Northwest region and our planet. This includes recognizing and upholding the inherent personhood and rights of Nature, which in turn helps ensure continuation of life. We realize it is not easy for an agency to do this, but if you work with the Tribes, this ideal can be realized. We must work together to address the climate, wildlife and conservation crises that threaten everyone's future. The notion of human supremacy and control over nature is an outdated colonial concept that is antithetical to Indigenous Peoples lifeways and contradicts the very facts of the universe. When humans respect and relate to nature through genuine consent and care, they adapt their interactions to help ensure the sanctity and integrity of natural and "wild" places are protected, thus supporting a good future for the next generations of all species, humans included.</p> <p>Tribes would like to develop lasting and meaningful collaborations with the BLM. Concomitant to that desire, and all requests by the Sinkyone Council expressed in these comments, is the crucial need for BLM to: renew and strengthen its federal trust and fiduciary responsibilities to Tribes; engage meaningfully with Tribes as sovereigns who possess longstanding, inherent, unceded, and unique rights; collaborate with Tribes to effectuate key provisions of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP); implement the principles of Free, Prior and Informed Consent (FPIC); and collaborate toward achievement of equitable BLM-Tribal decision-making, shared governance, and collaborative management.</p>	The BLM is honored to manage lands within the ancestral territories of InterTribal Sinkyone Wilderness Council member Tribes. The BLM looks forward to working closely with the Tribes to better understand these concepts and to co-steward these lands in implementation of NCIP.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Johnson	Eric	2	Amphibian Refuge	Alternatives - fish and aquatic species	Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, and climate change. Amphibians are the most threatened class of vertebrates and merit special attention in the Northwest California Integrated Resource Management Plan and Environmental Impact Statement (NCIP). Northwest California is a region of high amphibian diversity. The Pacific-Cascades-Sierra Nevada Ranges are one of three areas of amphibian species richness in the United States (the other two areas are the Southern Appalachian Mountains and the Southern Coastal Plain). The NCIP should include measures for amphibian protection, especially for rare species such as the California red-legged frog (federal threatened), foothills yellow-legged frog (proposed federal threatened and state threatened), Shasta salamander (state threatened), and western spadefoot toad. Protection measures should also be implemented for the diverse salamander populations in the NCIP planning area that includes ensatina, Pacific giant salamander, northwestern salamander, Olympic salamander, Del Norte salamander, black salamander, clouded salamander, and Shasta salamander.	Habitats for aquatic species (i.e., amphibians) will be prioritized for conservation and restoration following the Riparian Management Areas section. Terrestrial forested species will also afford protections with regards to development and management of late-successional reserves.
Johnson	Eric	2	Amphibian Refuge	Alternatives - wildlife	In Table 2-2, Row 80, a subsection for amphibians should be added. For Alternatives B, C, and D, amphibian habitat protection, and amphibian population monitoring should be included, especially for rare species such as the California red-legged frog, foothills yellow-legged frog, Shasta salamander, and western spadefoot toad. In Row 82, buffer areas for Shasta salamander are a good protection measure.	Management and policy decisions for special status or otherwise sensitive species is generally directed at the state or national level. The BLM is required and committed to preventing the listing of these species; actions towards this end are generally decided and implemented at the project level. These species would be managed as described in Table B-1, Row 82. If these species are found, BLM will manage sensitive species according to BLM policy.
King	John	116	N/A	Alternative D (preferred alternative)	I am a avid outdoors man. I use BLM property for hiking, fishing, hunting, prospecting and exploring. I am the VP for the NorCal GPAA Redding chapter, prospecting club. I also belong to Shasta Miners and Prospectors Association. My wife and I enjoy metal Detecting, sluicing, gold panning and rock hounding. Our club would prefer plan C, because it is the least restrictive, but I still have several concerns. This plan will nullify mining claims that we have maintained for many years. Making so many environmental zones also limits our ability to prospect around the Redding and Trinity areas. Another concern I have, is access for older members of the public. I am 67 years old, and it is harder for me to get access to BLM land through hiking. It seems like all of the plans are for 20 - 30 year Olds. It does not seem to be any provision for upgrading or maintaining roads or trails, only gating or removing access to them. Several of the waters that these plans propose for designation as a "wild and scenic" river are merely creeks or seasonal waters, and do not need to be designated as such. My final concern are the restrictions on electronic devices on BLM land. Metal Detecting for gold is not looting. It is the most environmentally friendly and effective way of prospecting for gold. Ebikes in the same way allow access for Seniors and disabled people. Battery operated motors for mining equipment do not cause environmental damage. Please consider making modifications for plan C to include my concerns.	The Proposed RMP/Final EIS would not nullify valid existing mining claims. Casual use means activities ordinarily resulting in no or negligible disturbance of the public lands or resources (43 CFR 3809.5). Metal detecting in ACECs with known sensitive cultural resources may have cumulative effects greater than casual use. Where the cumulative effects of casual use by individuals or groups have resulted in, or are reasonably expected to result in, more than negligible disturbance, the BLM State Director may establish specific areas as he/she deems necessary where any individual or group intending to conduct activities under the mining laws must contact BLM 15 calendar days before beginning activities to determine whether the individual or group must submit a notice or plan of operations.
Ledger	David	120	Shasta Environmental Alliance	Alternatives - forestry	Grass Valley South We are concerned that logging is continuing to be allowed upslope of this highly geologically unstable area resulting in more sedimentation of Grass Valley Creek. We encourage acquiring land along County Line Road next to Whiskeytown NRA and working with Cal Fire to limit logging in this area: continued logging degrades the considerable work that has been done to restore the Grass Valley watershed.	The Grass Valley South ACEC is designated as an ACEC. Fuels reduction and forest health projects are consistent with ACEC management to protect R&I values, which includes the sensitive soil types. Special designations and areas near special designations are a criterion for land acquisition as described in Appendix B Land Tenure and the ACEC sections. It is out of the scope of the NCIP to limit CAL FIRE's ability to approve logging plans on private lands.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Ledger	David	I20	Shasta Environmental Alliance	Alternatives - lands and realty	<p>Hawes Corner, Corning Vernal Pools While Hawes Corner is only 40 acres, we would recommend continuing to protect this area for preserving sensitive species. At the nearby Hawes and Ranch Supply at Dersch and Deschutes Road, the Shasta County Planning Commission approved a change in zoning from Ag land to Commercial Recreation on 143 acres including into the riparian areas and into the water of the Sacramento River with a Negative Declaration, no mitigation required. An adjacent parcel was cited by the county for grading and holding wedding ceremonies in the floodplain indicating threats to local habitat.</p> <p>Two miles away the Shasta County Board of Supervisors approved a large gun range in vernal pool and wetland areas in east Millville Plains which include Bear Creek. The shooting range will have pistol, rifle, skeet shooting and a high-powered rifle range. Overnight RV dry camping is allowed as well as several annual events of up to 500 people and many with up to 200 people. Currently the matter is in Superior Court as local residents have sued the county. With up to 98% of vernal pool areas in California lost to development, we strongly encourage you to preserve and acquire adjacent lands to these to areas as they become available.</p>	Table B-I describes how Hawes Corner ACEC will be managed. Under this plan, Corning Vernal Pools ACEC would also be designated. Management for this ACEC can be found under Table B-I.
Ledger	David	I20	Shasta Environmental Alliance	Alternatives - lands and realty	<p>Other Shasta County Areas The City of Redding owns approximately 380 acres of land in southwest Redding in an area called Oregon Gulch. This land has a natural vegetative cover of oak woodland and chaparral, that is protected as Open Space. This area is roughly between Country Heights on the north and just north of Branstetter Road on the south. It has several long ten acre parcels, running north to south that bring it close to Branstetter Road and a 15 acre BLM parcel. This Oregon Gulch property currently is in the planning stage of developing trails.</p> <p>Directly south of Oregon Gulch is the Gore Ranch owned by the McConnell Foundation consisting of approximately 1000 acres that recently was put into a conservation easement with the Shasta Land Trust. The south end of the Gore Ranch could connect to the Clear Creek Greenway and if allowed by the McConnell Foundation, a trail could be connected between Kenyon Drive in Redding, through Oregon Gulch and the Gore Ran and along the Clear Creek Greenway and through the Cloverdale area. Minor acquisitions or land trades would make this connection possible. We encourage BLM to work to make this possible.</p>	This 15-acre BLM parcel has been identified for disposal under Alt D. However, there are two other nearby parcels (internal BLM parcel number SHA-145 and FID-315) that BLM has identified as retention under Alt D. Land Acquisition Criteria can be found in Table B-I. Under Recreation and Visitor Services Table B-I, we identify improve recreation access and opportunities through prioritizing land tenure projects that provide public access.
Ledger	David	I20	Shasta Environmental Alliance	Alternatives - new special designation nominations	<p>Sierra Pacific Industries owns 35% of the land in the Battle Creek watershed including over 80% of the industrial forest land in the watershed. Their preferred method of forestry is clearcut logging, and because of their extensive increase in logging in he area since 1995, it is having the increased effect of raising air temperatures, decreasing wildlife diversity and adding sedimentation into Battle Creek from logging roads and storm events on steep clearcut logging slopes.</p> <p>Recently NOAA and NMFS approved a 50 year Habitat Conservation Plan for Sierra Pacific Industries with a Safe Harbors Act exemption for incidental kill of protected fish species in the entire HCP area of about 350,000 acres. As SPI owns 35% of the land in the Battle Creek watershed and 80% of the industrial forested land, any incremental addition of land that BLM can acquire which will protected from clearcutting will help the watershed. Roads, both public and private logging roads, are the biggest sources of sedimentation of the creek, all BLM lands in this area should be closed to OHV's and no roads built unless necessary for land management. There will only be three water monitoring locations in the entire HCP and none in Battle Creek. One monitoring station will be above Shasta Dam.</p>	The BLM has management direction in the Proposed RMP/Final EIS and BMPs in Appendix F to minimize sedimentation and impacts to water quality. See Riparian Management Areas, Table B-I for further details. The Sacramento River Bend Area ACEC is designated as OHV limited which means that vehicles are limited to existing routes until otherwise designated in implementation level travel management planning.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Ledger	David	120	Shasta Environmental Alliance	Alternatives - new special designation nominations	Swasey Recreation Area This formerly popular hiking and horseback riding area is becoming extremely popular with mountain bikers with two trails built exclusively for mountain bikes. (Hikers can walk the two trails, but it is not safe as they were built for skilled mountain biking with high-speed banked turns and many jumps.) With management building more mountain biking trails in this area, it would be best to concentrate mountain biking in this area and limit it on other BLM lands in local lands elsewhere to allow groups seeking to learn, educate and enjoy nature to have more trails they can access without having to worry about safety concerns and disruptions from speeding mountain bikes.	Throughout the Redding Trails SRMA the Proposed RMP/Final EIS identifies several RMZs each with slightly different recreational activity focuses (included in Table B- I, Recreation in the identified activities and actions). We used these to balance multiple uses within recreation areas.
Ledger	David	120	Shasta Environmental Alliance	Alternatives - special designations	Sacramento River Bend Area We urge you to adopt Alternative D for this area and limit mountain bikes in this area as much as possible as they are not compatible with wildlife and those seeking to enjoy nature such as the groups of our alliance listed above, nor are they compatible with horseback riders. We would encourage you to limit bikes from beyond the fencing at the end of the Perry Riffle Trail. As this area is being preserved to also enhance the riparian areas for the benefit of the endangered fish, we would encourage stronger fencing in areas where cattle are allowed to protect riparian areas. Acquisition of land to expand this area is very important to protect endangered species especially salmon and steelhead trout and we urge you to continue this process.	The Proposed RMP/Final EIS includes livestock grazing restrictions in the Riparian Management Area as described in Sections D.2.4 and D.3.8 to protect sensitive species. The BLM will conduct travel management planning at the implementation stage, as needed.
Llnocln	Kelly	34	N/A	NEPA (National Environmental Policy Act)	I am confused about the statement at the end of the plan that says maps will not be developed until after the plan is adopted because the plan is also an environmental impact statement. Or is there a separate EIS that I do not have a link to? Does that EIS, if it exists, have maps?	We are unsure which statement is being referred to. This document is both a resource management plan, and an environmental impact statement that analyzes the potential effects of implementation of management alternatives. Maps associated with the RMP/EIS are provided in Appendix A.
Llnocln	Kelly	34	N/A	NEPA (National Environmental Policy Act)	In his post on local media, Congressman Huffman reports that this plan is the "preferred alternative," but i do not see the alternate plans. where does the public Easily find these documents? I dont see them posted under "notices" on the BLM webpage.	There were multiple plan alternatives analyzed in the Proposed RMP/Final EIS (described in Appendix B). Alternative D was identified as BLM's Preferred Alternative in that document.
Llnocln	Kelly	34	N/A	Planning process	And then Im confused about the relationship of this document to the creation of the wildernesses, trails, and recreation areas it mentions. They all already exist. This document doesnt seem to fund their development. Is it correct to say that the document establishes the definitions and the relationships between all the agencies in the development and managment of these recreation opportunities?	Alternative A is no action; alternatives decide whether to carry forward existing management, change it, or add new management. Management actions identify coordination with agencies that would be required to implement management.
Llnocln	Kelly	34	N/A	Wilderness, Wilderness Study Areas, and Lands with Wilderness Characteristics	Also, I searched the plan for the word "disabled" and got no returns. Do the 300 square miles designated as wilderness areas since 2019 plan to allow anyone with mobility issues to continue to use any of the existing federal roads in these areas? Without maps, i do not know if there are any, or what quality they may be.	The Proposed RMP/Final EIS states in the Recreation section of Table B-I that ADA mobility devices would be allowed on routes that are consistent with safe use by those devices.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	3. Eden Valley: This area is slightly less than 5,000 acres, and BLM's inventory did not find that it contained wilderness characteristics due to size considerations. However, Eden Valley is an integral part of a complex of BLM lands and USFS administered Mendocino National Forest parcels in the Elk Creek Watershed -an area that has two proposals for VWSR designation in S. 1776 and HR 3700. Additionally, BLM's Arcata Field Office is in the process of acquiring land adjacent to Eden Valley. The entire region, including the potentially acquired land, is proposed for wilderness designation in S. 1776. The National Environmental Protection Act (NEPA) imposes a continuing obligation on the BLM to evaluate new circumstances or information relevant to environmental impacts of proposed actions. The Elk Creek acquisition is currently in process and represents new circumstances relevant to the management and designation of LWCs. This full area should be reassessed for LWCs.	Revisions have been made to clarify management direction in the RMP/EIS. The Proposed RMP/Final EIS includes language in Table B- I Lands with Wilderness Characteristics to update the lands with wilderness characteristics inventory for units that are adjacent to future acquisitions.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	Pew also urges the BLM to include nearly 21,000 acres of the three existing ACECs proposed to be removed due to their overlapping boundaries with Wilderness areas. The first is the South Fork Eel River ACEC, which contains habitat for the endangered Chinook salmon and Coho salmon. The second is the Elder Creek ACEC, which the BLM acknowledges as a significant area, and the lower portion of which is managed for wild lands research by the University of California, Berkley. The result of removing Elder Creek's ACEC designation would be that the this designated critical habitat for the Chinook salmon, Coho salmon, and steelhead will have no special management protection as is afforded by the current ACEC designation management. Moreover, there are significant portions of the Elder Creek ACEC that will be unprotected because it does not overlap with the Southfork Eel River Wilderness. Finally, the BLM also plans to remove the Red Mountain ACEC, which hosts several federally endangered and rare plant species that rely on the serpentine soil of the area. While these ACECs overlap with Wilderness areas, such designations do not preclude the BLM from designating ACECs. While Wilderness designations provide significant protection, ACECs can be overlaid to provide management specific to the values for which an ACEC is designated. The BLM can and should consider areas that meet the relevance and importance criteria regardless of underlying designations such as Wilderness, WSAs, Back Country Areas (BCAs), or other conservation designations. In this way, the BLM would be fulfilling responsibilities outlined in FLPMA through prioritizing the designation of ACECs. Thus, Pew encourages the BLM to carry forward the ACEC designations to ensure protection of their critical habitat and connectivity corridors.	This ACEC is not being carried forward as the resources it contains are now protected by the designation of wilderness; it no longer requires special management attention afforded by ACEC designation because the R&I values are protected by the Wilderness designation.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	Pew further appreciates that the BLM included the six citizen nominated ACECs by CalWild et al. This includes portions of the Swasey Clear Creek Greenway, Beegum Creek Gorge, Grass Valley Creek, Eden Creek, and Willis Ridge. Pew supported scientific analysis, conducted by Conservation Science Partners, as part of these nominations, and we are pleased to see that the BLM largely concurs with these findings. In particular, the ACEC Report on the Application of the Relevance and Importance Criteria mentions that these nominations meet multiple criteria, and we recommend emphasizing the necessity of special management attention for these ACEC nominations.	ACEC designations emphasize that special management is needed to protect R&I values. ACEC proposed management can be found in the Proposed Action, Volume 3 NCIP RMP, Appendix G ACEC Report, and also in the Table B-1 and in the Management Common to All in the ACEC section.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	Pew recognizes BLM's efforts through including and evaluating 31 potential ACECs within the range of the alternatives. Pew recommends that the BLM carry forward the full suite of ACEC nominations into the proposed final plan and record of decision. We noted there were many rationales for ACECs that look ahead to how climate change will change the ecosystem. For example, the BLM analyzes the Grass Valley Creek ACEC as an intact landscape likely to have high climate resilience. We applaud the BLM for the use of ACECs to protect Essential Connectivity Corridors (ECCs) of High Biological Value, such as the Beegum Creek Gorge ACEC and the Upper Mattole ACEC. We also recognize and commend the corridor conservation efforts in the BLM's management prescription in Alternative B of the Gilham Butte ACEC to maintain a corridor between the neighboring Humboldt Redwoods State Park and the King Range Conservation Area. By layering conservation designations on ecologically valuable areas like ECCs, ACECs can help plant and animal species to better adapt to climate change.	The ACECs included in the Proposed RMP/Final EIS are listed in Table B-1 (beginning Row 250) The BLM has taken the recommendation into consideration on the Proposed RMP.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	<p>WSAs are BLM's most durable and important administrative designation to maintain wilderness character on certain high value public lands. These wild and undisturbed BLM-managed lands harbor important wildlife habitat and enhance species connectivity between other protected lands, provide backcountry recreation experiences, and serve as climate refugia for species adapting to a changing planet. These lands also sequester significant amounts of carbon, help conserve scarce water resources, and safeguard cultural landscapes and artifacts. To meet the nation's and California's ambitious conservation goals to conserve 30 percent of lands and waters by 2030, the BLM must consider these areas for durable administrative protection as WSAs.</p> <p>Pew applauds the BLM for exercising its authority by including Section 202 WSAs in the range of alternatives within the DEIS. Specifically, Pew supports the designations of Brushy Mountain/English Ridge, Gilham Butte, Red Mountain, Trinity Alps, and subunits 1 and 2 of the Yolla Bolly WSAs. All these areas were inventoried by the BLM and/or a local citizen group, and found to contain wilderness characteristics as well as supplemental values, which are detailed in the CalWild et al comments, incorporated by reference here. Pew recommends that the BLM carry these six units forward into the final plan and record of decision.</p> <p>These lands should be managed consistent with BLM's Manual 6330 "Management of BLM Wilderness Study Areas" to maintain the area's suitability for preservation as wilderness. This includes the following guidance laid out in Manual 6330:</p> <ul style="list-style-type: none"><li>- Preventing impairing activities by not allowing new surface disturbing uses or facilities, as well as by providing public information, such as posting signs at key WSA access points, and providing maps and information on BLM websites.</li><li>- Monitoring WSAs at an interval that ensures continued suitability for designation as wilderness.</li><li>- Documentation, including photos of conditions, primitive routes, range developments, and other activities, including maintaining a permanent file with photos and a record of monitoring activities.</li></ul>	The Proposed RMP/Final EIS identifies Section 202 WSAs and how they will be managed as described in Table B-1.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	<p>For each ACEC, the BLM should include specific management prescriptions to protect the values for which the ACEC is designated. This may include:</p> <ul style="list-style-type: none"><li>- A withdrawal from mineral entry;</li><li>- Close to leasing or allow leasing only with no surface occupancy with no exceptions, waivers, or modifications;</li><li>- Designation as ROW exclusion areas;</li><li>- Close to construction of new roads;</li><li>- Designation as closed to motor vehicle use, as limited to motor vehicle use on designated routes, or as limited to mechanized use on designated routes;</li><li>- Close to mineral material sales;</li><li>- Designation as VRM Class I or II;</li><li>- Restricting construction of new structures and facilities unrelated to the preservation or enhancement of wilderness characteristics or necessary for the management of uses allowed under the land use plan; and/or retain public lands in federal ownership.</li></ul>	The management actions identified for each ACEC in the Proposed RMP/Final EIS can be found in Table B-1, beginning Row 250.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	Pew recommends the BLM return to using extended eligible river corridors, especially where management directions are to acquire more lands from willing sellers.	The BLM has extended the corridor for suitable segments based on our judgement and current policies and regulations. Acquisition criteria allows us to acquire land within and nearby special designations. This was written this way to avoid missing opportunities to protect areas just outside the designated boundaries.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	The already designated WSR segments that were included in the ineligibility table incorrectly should be removed and greater justification for ineligible rivers and specific segments should be added to the table.	Thank you for noting the inconsistency. At this point, the BLM will not be making changes to the Eligibility Report.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - new special designation nominations	The BLM should apply management prescriptions sufficient to protect the values for which the ACECs are designated.	The management actions identified for each ACEC in the Proposed RMP/Final EIS can be found in Table B-1 to protect the ACEC's values described in Appendix G.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - wilderness/wsa/lwc	Pew also requests that the BLM pay special attention to lands identified in federal legislation as deserving of wilderness protection by California's Members of Congress and Senators. Included in Appendix A is a list of lands that should be reevaluated and found eligible for inclusion in BLM's LWC Inventory and a brief explanation of why.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-I of Appendix B for lands with wilderness characteristics managed as a priority over other use.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - wilderness/wsa/lwc	Pew also requests that the BLM pay special attention to lands identified in federal legislation as deserving of wilderness protection by Californian's congressional representatives. Included in Appendix A is a list of lands that should be reevaluated and found eligible for inclusion in BLM's LWC Inventory and a brief explanation of why.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-I of Appendix B for lands with wilderness characteristics managed as a priority over other use.
Maggi	Andrew	32	Pew Charitable Trusts	Alternatives - wilderness/wsa/lwc	Pew recommends the BLM consider adjacent federal lands managed by different agencies as wilderness or the protection of wilderness characteristics as one contiguous wild unit. This approach would allow additional lands to be added to the LWC inventory and be managed to protect their wilderness characteristics.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-I of Appendix B for lands with wilderness characteristics managed as a priority over other use.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	2. Hulls Creek tributaries: Casoose Creek, Brin Canyon Creek, and Horse Canyon Creek flow into Hulls Creek. About 16 miles of Hulls Creek is eligible and suitable in the 2023 inventory due to its outstanding anadromous fishery. WSR protection of these Hulls Creek tributaries would increase the protection of the North Fork's anadromous fishery by adding upstream fish habitat and existing sources of high-quality water that ultimately flow into the North Fork.	Hulls Creek tributaries have been added as suitable to "Hulls Creek Complex".
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	3. East Branch South Fork (EBSF) Eel River and its tributaries: Segments of the EBSF Eel and its tributaries - Cruso Cabin, Elkhorn, and the School Section Creek complex - should be considered together. The eligible/suitable segments should begin at the sources of Cruso Cabin, Elkhorn, and School Section Creeks to their confluence with the EBSF Eel River and include the EBSF Eel downstream to at least the Little Butte Ecological Reserve. Cruso Cabin and Elkhorn were included as proposed WSRs in federal legislation that has passed the House of Representatives several times. These same streams are included in federal legislation currently under consideration by the Senate Energy and Natural Resources Committee. The EBSF Eel River and its tributaries are important high quality water contributors to the South Fork Eel River and its anadromous fisheries. BLM management direction should focus on acquisition from willing sellers of private lands in the WSR corridors and surrounding areas.	The BLM recognizes the regional importance of the segments; however, the BLM has determined that managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. The area is protected as a wilderness area and regulations which will meaningfully protect these values. BLM acquisition criteria can be found in Lands and Realty - Land Tenure.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	5. Mill Creek: The 0.2-mile eligible segment of Mill Creek is located downstream of a 32-mile segment of the creek on the Lassen National Forest determined eligible and suitable for WSR protection. Though the eligible BLM segment is short, it possesses outstandingly remarkable scenery, fish, wildlife, geology, and cultural values. It is also adjacent to the Dye Creek Preserve, which is owned by the state and managed by The Nature Conservancy, which has a long-term land conservation strategy for the Lassen Foothills. At the minimum, the 0.2-mile segment of Mill Creek should match the status of the segment of creek in Lassen National Forest and be provided protection.	The BLM recognizes the regional importance of Mill Creek (particularly for fisheries and recreation); however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	6. Mattole River and tributaries: Of the 14.7-mile extended eligible corridor, about 2.7 miles flow through BLM-managed public lands. In addition, several Mattole tributaries were determined eligible including 2 miles of Sholes Creek, 4.2 miles of Fourmile Creek and its North Fork, 1.5 miles of Grindstone Creek, and .2 miles of Eubank Creek. All of the eligible segments possess outstandingly remarkable anadromous fish value. Because of statewide interest in conserving the Mattole River watershed, the BLM at the minimum should retain eligibility of the Mattole segments and its tributaries to maintain interim protection of the fish values.	The BLM recognizes the regional importance of the Mattole River and its tributaries as mentioned in the Gilham Butte ACEC and Upper Mattole ACEC Table B-I. Additionally, the BLM has determined current federal and state laws provide protection to this area and protect the ORVs. BLM acquisition criteria can be found in Lands and Realty - Land Tenure.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	7. Tenmile Creek: A 0.4-mile segment of Tenmile Creek was found eligible due to its outstanding anadromous fishery, but the creek was determined unsuitable for designation in part for its fragmented nature in relation to BLM managed lands. However, when Tenmile Creek leaves BLM-managed public land, it flows for more than a half mile through the state-owned Angelo Coast Range Reserve. From where Tenmile Creek enters the BLM land, flows through the Angelo Reserve, to its confluence with the South Fork Eel River, it should be determined suitable. In addition, the creek provides a popular class IV kayak run which leads boaters into the SF Eel wilderness run, making recreation an additional ORV.	The mention of Angelo Reserve as a neighbor has been added to the Suitability Report. BLM maintains its conclusion that the recreation value on the BLM segment does not meet criteria as outstandingly remarkable, and that this segment of Tenmile Creek is not suitable.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	8. Sevenmile Creek: Sevenmile Creek is the only Sacramento River tributary in the Sacramento River Bend Area to be determined eligible but not suitable. About 1.3 miles of the creek and 5.8 miles of its tributaries are eligible due to outstandingly remarkable cultural and ecological values. Sevenmile Creek and its tributaries are located within the Sacramento River Bend ACEC and possess cultural and ecological values that contribute to the unique nature of the overall area and its suitable rivers. To optimize this strategy, section 35 between the ACEC boundary and Sevenmile Creek's confluence with the Sacramento River should be acquired on a willing seller basis. Until such a time, the river should remain eligible, and its important values protected.	Revisions have been made to clarify management direction in the RMP/EIS. The suitability determination for Sevenmile Creek and tributaries has been updated in the Proposed RMP/Final EIS and Wild and Scenic Rivers Suitability Report.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	DEIS, Vol. 3, Appendix G, Chapter 3. Suitability Determination: Not Suitable Segments, pgs. 3-1 to 3-161, identifies eligible rivers determined by the BLM to be non-suitable. However, the language used to describe the non-suitability of several segments appears to be repetitive and not specific to that particular stream. In some cases, this leads to inaccurate and unsupported determinations of non-suitability or weak justifications for such a decision. Non-suitability decisions are a significant issue. If they are included in Alternative D, once the NCIP is finalized and a Record of Decision (ROD) released, these eligible but non-suitable segments will lose interim protection of free-flowing character, tentative classification, and ORVs. Pew recommends that where BLM-managed public lands are minimal and fragmented, eligibility of these rivers should be preserved to support future land acquisitions that improve VSR protection and management. For streams deemed eligible and where current management direction exists to acquire more public lands that would reduce fragmentation exists, Pew recommends they be determined suitable. CalWild et al has submitted comments on VSRs that share similar concerns to those Pew is submitting. Their comments provide a deeper level of analysis and are incorporated by reference. Included in appendix B are a selection of rivers Pew believes should be.	The final Suitability Report contains expanded rationale for some streams. As discussed in the Suitability Report, ORVs for the non-suitable streams will be maintained through various other mechanisms.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The Revised WSR Eligibility Report (2023) Table 2-3, pgs. 2-15 to 2-17, displays a list of inventoried rivers determined ineligible. The table does not narratively describe why the inventoried segments are not eligible. More concerning, the table includes some river segments as ineligible that are already in the NWSRS, including 0.4 miles of the North Fork Trinity River, 2.2 miles of the North Fork Eel River, and 2.4 miles of the South Fork Eel River.</p> <p>Previous WSR inventories conducted in 1993 (Redding RMP) and 1995 (Arcata RMP) identified WSR corridors that extended beyond just the short segments where the stream flows on public lands managed by the BLM. This was necessary given the scattered nature of BLM-managed public lands in north central and northwest California. Otherwise, many eligible streams in the NCIP region would be considered non-suitable due to the difficulty of managing and protecting river values on short segments limited to just public lands. These concerns found validation as the 2018 and 2023 WSR inventories largely focus on the eligibility of only the public land segments, rather than an extended segment that more logically can be managed to protect river values. The 2018 and 2023 inventories include more eligible segments but less eligible miles than the 1993/1995 inventories. Pew believes that all suitable rivers listed in the inventory would benefit from the establishment of extended river corridors that go beyond the smaller, discreet segments on public lands, particularly where existing BLM management direction is to acquire more public lands from willing sellers in the river corridors.</p>	The Eligibility Report is final and changes are not being considered at this time. The designated segments listed were errors and being on the list does not change management as designated rivers in the WSR.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	<p>I. Deer Creek: An important tributary to the Sacramento River, Deer Creek possesses outstanding scenery, recreation, and fish values. The creek is listed as non-suitable (App. G, pg. 3-61). The 0.2-mile eligible segment reflects only the portion of the creek flowing on BLM-managed public lands, even though the 1993 inventory documented an 8.1-mile eligible segment for Deer Creek extending from the Lassen National Forest boundary to the Deer Creek diversion dam. While the suitability analysis accurately reflects the status of public lands in the Deer Creek corridor, it ignores the fact that Deer Creek flows through the Deer Creek ACEC, with existing management direction to acquire from willing sellers more public lands in the extended corridor.</p>	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I. Protection of the Deer Creek as an ACEC appropriately addresses these values.
Maggi	Andrew	32	Pew Charitable Trusts	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The final suitable river tables should show both the eligible miles on BLM-managed public lands and the overall miles of the extended corridor.</p>	The table in the Suitability Report has been updated to show BLM miles and total miles.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Best available science and information	<p>Executive Order 14008, entitled "Tackling the Climate Crisis at Home and Abroad" (January 2021), calls for a government-wide approach to the climate crisis, including by increasing resilience to the impacts of climate change by conserving our lands, waters, and biodiversity.</p> <p>Following the issuance of EO 14008, the Department of the Interior (DOI) released a series of updated climate policy Departmental Manuals (DM) on September 28, 2023. In particular, 604 DM 1, "Landscape-Level Management", outlines the department's policy, which also applies to its component Bureaus, including the BLM, to advance landscape-level approaches, including prioritizing landscapes for conservation. Furthermore, 523 DM 1, "Climate Policy", directs DOI to, among other actions, "...integrate. climate change adaptation strategies into its policies, planning, programs, and operations, including, but not limited to, park, refuge, and public land management..." I The manual further acknowledges the inherent uncertainty associated with climate change and directs the department to utilize: (1) vulnerability assessments, (2) scenario planning, (3) adaptive management, and (4) other risk management or other decision-making approaches. Finally, as related to the NCIP, the policy directs the inclusion of "...measurable goals and performance metrics in all management plans that address climate change adaptation, regularly assess and report on whether adaptive actions are achieving desired outcomes..." 2 I. Department of Interior, 2021, 523 DM 1, p. 1 2. Department of Interior, 2021, 523 DM 1, p 3</p> <p>Pew recognizes that this guidance was not in place while the DEIS was being drafted but appreciates that the BLM has included goals and objectives across all alternatives within the DEIS to address the myriad impacts of climate change, including promoting the adaptive capacity of ecosystems through increased resilience, diversity, and connectivity, and providing for monitoring to inform management approaches. Additionally, the BLM has identified the need for habitat conservation in response to climate change, to help facilitate species migration and population changes. To achieve these goals, the BLM must protect intact landscapes and rivers that often serve as climate refugia through LVCs, ACECs, WSAs, and WSRs. Further, connectivity between intact landscapes must be maintained and enhanced. Additional recommendations around these allocations, designations, and connectivity are below. Finally, the BLM must ensure that a monitoring program is implemented to track the impacts of climate change, how management is affecting landscapes, and provide for adaptive management. Recommendation: Pew encourages the BLM to adhere to these updated guidance manuals within its resource management planning process, including for the NCIP.</p>	<p>RE: 604 DM 1, "Landscape-Level Management;" the Proposed RMP/Final EIS includes consideration of landscape level management, including the use of Essential Corridors of Connectivity, which includes large relatively natural landscape blocks that are essential to the ecological connectivity important to species, and places restrictions on certain activities that could adversely affect wildlife and the integrity of plant habitats. Furthermore, the protections that ACECs, WSRs, Section 202 WSAs, and lands with wilderness characteristics afford within these Essential Corridors of Connectivity are designed to further safeguard species and their ease of movement throughout the planning areas, especially with the consideration of a changing climate and the need to protect sensitive areas.</p> <p>RE: 523 DM 1, "Climate Policy;" the BLM is required to follow the guidance outlined in the policy and the Proposed RMP/Final EIS provides goals, objectives, and management direction to address climate change resilience and adaptations. For more comprehensive information on goals, objectives, and management actions related to climate change, please refer to Table B-1 on Climate Change in the Proposed RMP/Final EIS. Furthermore, Section D.2.1 on Air Quality and Climate delves into a thorough explanation of the current conditions and trends of climate change and drought in the planning area. This is followed by an analysis of the direct, indirect, and cumulative impacts that account for drought and climate change. The Proposed RMP/Final EIS also includes a detailed baseline analysis for current conditions and trends associated with climate change. Multi-jurisdictional EcoAdapt vulnerability assessments were completed for key vegetation types, wildlife, and pollinators that identify climate and non-climate stressors, disturbance regimes, and adaptive capacities that helped to inform long-term management approaches that support ecological resilience in the NCIP Planning Area. The BLM would follow climate policy in evaluating the Proposed RMP/Final EIS in compliance with 43 CFR §1610.4-9 to determine the effectiveness of different management actions and achievement of goals/objectives identified in the plan. Furthermore, the BLM would follow the 523 DM 1 climate policy during implementation level planning to ensure impacts on resources are assessed and minimized through the use of the referenced 1) vulnerability assessments, (2) scenario planning, (3) adaptive management, and (4) other risk management or other decision-making approaches.</p>
Maggi	Andrew	32	Pew Charitable Trusts	Consistency with other plans, laws, and regulations	<p>BLM should define 30x30 lands as ACECs, LVCs that are managed as a priority, suitable WSRs, designated WSRs, wilderness areas, and WSAs, and other designations, when the goals, objectives, and management actions prescribed in a resource management plan provide protection and durability.</p>	<p>As outlined in Chapter 1. Introduction, the NCIP strives to meet the goals of the America the Beautiful Initiative and California's Pathway to 30x30 report by providing a range of alternatives with different compositions of special designations and protected areas in the form of existing and proposed ACECs, Section 202 WSAs, Wilderness, WSRs, late successional reserves, and lands with wilderness characteristics managed as a priority.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Maggi	Andrew	32	Pew Charitable Trusts	Consistency with other plans, laws, and regulations	2) BLM should craft a final proposed NCIP plan that includes a robust mix of these designations and allocations, with management to sufficiently and durably protect these lands and rivers to best meet the 30x30 goals.	<p>The America the Beautiful Initiative and the California 30x30 initiative (see Section 1.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider “conserved.” Table 1-2 in Chapter 1 of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table 1-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>
Maggi	Andrew	32	Pew Charitable Trusts	FLPMA - General	Pew encourages BLM to fully implement the ACEC provisions in FLPMA, including increased conservation emphasis and expanded applicability to broader landscape conservation.	Thank you for your comment. The BLM has taken the recommendation into consideration in the Proposed RMP.
Maggi	Andrew	32	Pew Charitable Trusts	Tribal consultation and coordination	The landscapes that will be considered during this process include important places for Indigenous tribes in the region, including the Cahto, Karuk, Wintun, and Yurok Nations and the peoples represented by the Round Valley Indian Tribes. Input from these sovereign nations and communities will be critical during the NCIP planning process. Pew urges the BLM to conduct thorough and meaningful outreach and consultation throughout the RMP development process to ensure the interests of both federally recognized and non-federally recognized tribes are prioritized, understood, and included in the planning process.	Cooperating agencies -- those federal, state, and local agencies and Tribes that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative, pursuant to 40 CFR 1051.8, were consulted through the NEPA process. In January and February 2021, the BLM sent letters to 68 local, state, federal, and Tribal representatives, inviting them to participate as cooperating agencies. A total of 25 entities agreed to participate as a cooperating agency.
Master	Form I	30	N/A	Alternatives - lands and realty	I also ask the BLM to prioritize acquisition of new lands from willing sellers along key riparian and wildlife migration corridors, in critical deer winter range, wetland habitat, coastal areas, habitat for sensitive native species, proposed and designated Wild and Scenic River corridors, and lands that would provide recreation access, improve water quantity and quality, and are within or nearby Wilderness, WSAs, and LWCs.	Table B-1 describes how lands are prioritized for acquisition by the BLM under the Proposed RMP/Final EIS.
Master	Form I	30	N/A	Alternatives - special designations	I encourage the BLM to prioritize conservation management in the final plan, including: 1) Managing Cahto Peak, Camp St. Michel, Chappie-Shasta, Grass Valley South, and Sacramento River Bend as lands with wilderness characteristics (LWCs); 2) managing English Ridge, Gilham Butte, Trinity Alps, Red Mountain, and Yolla Bolly as wilderness study areas (WSAs); and 3) designating Eden Valley, North Fork Eel, Beegum Creek Gorge, Deer Creek, Gilham Butte, Grass Valley Creek, Sacramento River Bend, Shasta and Klamath River Canyon, Upper and Lower Clear Creek, Mattole River, and Willis Ridge as Areas of Critical Environmental Concern.	The Proposed RMP/Final EIS identifies Lands with Wilderness Characteristics, Section 202 WSA, ACEC to be managed as described in Table B-1.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Air quality and climate change	<p>The BLM is required to take a hard look at direct, indirect, and cumulative impacts to and from climate change in the planning area in the NCIP.The BLM baseline data on climate change must be sufficient to permit analysis of impacts under NEPA. Importantly, 40 C.F.R. § 1502.15 requires agencies to "describe the environment of the areas to be affected or created by the alternatives under consideration." Establishment of baseline conditions is a requirement of NEPA. In Half Moon Bay Fisherman's Marketing Ass'n v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit states that "without establishing. . . baseline conditions. . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." The court further held that "[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process."</p> <p>The BLM's duty to evaluate reasonably foreseeable significant adverse impacts includes "impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason." 40 C.F.R. § 1502.22(b). Such impacts are especially significant in the face of climate change. We believe that this draft falls short of providing a meaningful baseline analysis from which climate considerations and future management decisions can be based.We ask that the final plan clearly provide such an analysis as required or outline a plan to complete this action within one year of the ROD for NCIP.</p>	<p>The BLM has completed a comprehensive baseline analysis included in the Analysis of the Management Situation for the NCIP and as discussed in the Affected Environment of Section D.2.1 Air Quality and Climate of the Final EIS.Additionally, multi-jurisdictional EcoAdapt vulnerability assessments were completed, organized by habitat type, that highlight the known resource vulnerabilities of BLM managed lands in the NCIP planning area, and how different resources, resource uses, and local communities may be impacted by climate change.</p> <p>Furthermore, the BLM conducts a number of ongoing monitoring protocols across different resource areas which can be used to conduct meaningful analyses of a changing climate. Forest inventories, datasets of vegetation distributions, and robust wildlife monitoring across of a range of species are all baseline datasets from which the impacts of climate changes and management decisions can be evaluated. The BLM will continue to work with partner agencies specializing in the collection of climate data including temperature, wind patterns, and hydrology as well as researchers focused on the impacts of climate change on flora and fauna across the planning area to continue using adaptive management to protect resources.</p> <p>The BLM also recognizes the persistent drought challenges within the planning area, attributed to climate variability.The Proposed RMP/Final EIS aims to reduce impacts caused by drought by managing for a diverse, ecologically resilient landscape and healthy forests.This includes placing an emphasis on active forest and vegetation management to enhance ecosystem function and enhance resiliency to large disturbances such as drought, catastrophic fire, and heavy rainfall. Goals, objectives, and management direction to address on-going impacts from drought include, but are not limited to, prioritizing hazardous fuels reduction and prescribed burning within fire-dependent ecosystems, reforestation to maintain forest health, employing management actions that promote habitat connectivity, and providing for management changes for grazing allotments during periods of extended drought. For more comprehensive information on goals, objectives, and management actions related to climate change and drought, please refer to Table B-1 on Climate Change and Livestock Grazing in the Proposed RMP/Final EIS. Furthermore, Section D.2.1 on Air Quality and Climate delves into a thorough explanation of the current conditions and trends of climate change and drought in the planning area.This is followed by an analysis of the direct, indirect, and cumulative impacts that account for drought and climate change.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - general alternative comments	The final plan must prioritize and embrace ecosystem resilience as a way to both mitigate and adapt to climate change, in addition to addressing greenhouse gas emissions and direct impacts from climate change, such as drought, wildfire, and sea level rise. Through the final plan, BLM must adopt long-term management prescriptions that maintain and enhance ecosystem resilience with respect to a changing climate. Plan elements in Alternatives B and D, detailed in other sections of our letter and including administrative protections like WSAs and ACEC, represent our best chance at maintaining ecosystem resilience in the face of climate change. We urge the BLM to prioritize protecting critical habitat, migration corridors, and other sensitive resources, particularly as these resources face the threat of climate change.	The Proposed RMP/Final EIS provides goals, objectives, and management direction to ensure ecosystem resilience. Essential Corridors of Connectivity, as mapped by the California Department of Transportation and the California Department of Fish and Game's California Essential Habitat Connectivity project, are considered for decision-making to ensure important wildlife and plant habitats are not adversely impacted. The NCIP also outlines management actions in the Proposed RMP/Final EIS to proactively manage for drought, carbon sequestration, plant community resilience, and air and water quality, to ensure ecosystems are adapting to climate change and adverse impacts are minimized. Multi-jurisdictional EcoAdapt vulnerability assessments were completed for key vegetation types, wildlife, and pollinators that identify climate and non-climate stressors, disturbance regimes, and adaptive capacities that helped to inform long-term management approaches that support resilience. Protections are proposed for areas with sensitive natural and cultural resources in the form of ACECs, Section 202 WSAs, WSRs, and lands with wilderness characteristics managed as a priority over other uses. Additionally, acquisition near these protected areas are prioritized to further enhance the values for which they are designated, particularly if located within an Essential Corridor of Connectivity. Lastly, the Proposed RMP/Final EIS includes proactive management direction to reduce the risk of catastrophic wildfires through forest health treatments, fuels reduction projects, prescribed burning, and collaborating with partners, local/state/federal agencies, and Tribes.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - general alternative comments	FLPMA is sufficiently flexible that the agency has broad discretion to provide durable administrative protections through resource management planning processes with sufficient policy guidance. In the spirit of 30x30 and America the Beautiful, the FEIS should ensure that more acres will be managed to maintain a primarily natural state, providing connectivity corridors and habitat for wildlife and ensuring clean water and air for local communities.	<p>As outlined in Chapter 1. Introduction, the NCIP strives to meet the goals of the America the Beautiful Initiative and California's Pathway to 30x30 report by providing a range of alternatives with different compositions of special designations and protected areas in the form of existing and proposed ACECs, Section 202 WSAs, Wilderness, WSRs, late successional reserves, and lands with wilderness characteristics managed as a priority.</p> <p>The America the Beautiful Initiative and the California 30x30 initiative (see Section 1.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider "conserved." Table 1-2 in Chapter 1 of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table 1-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - specific change to existing alternative	Table 1-2, pg. 1-7 transposes the mileage for Paynes Creek and Paralyze Canyon. The eligible/suitable segment of Paynes Creek is 7.7 miles and the mileage for Paralyze Canyon is 3.6 miles.	Revisions have been made to clarify management direction in the RMP/EIS. Thank you for your comment, we have updated the document to correct the mileage for the Paynes Creek and Paralyze Canyon Tributaries segments.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - fish and aquatic species	The federally threatened California red-legged frog ( <i>Rana draytonii</i> )--ponds should be prioritized with vegetation for cover and good water quality.	These habitats would be prioritized for conservation as outlined in the Riparian Management Section.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - fish and aquatic species	The proposed federally threatened foothill yellow-legged frog ( <i>Rana boylei</i> )--Clear streams in foothill areas should be prioritized for improving water quality and removal of invasive predators.	Habitats for aquatic species (i.e., amphibians) will be prioritized for conservation and restoration following the Riparian Management Areas section.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - fish and aquatic species	The US Fish and Wildlife Service is proposing to list the Northwestern pond turtle ( <i>Actinemys marmorata</i> ) as threatened under the Endangered Species Act. 17 Habitat and populations should be mapped, and management following the Service's Western Pond Turtle Range-wide Management Strategy (2020). 18 Habitat fragmentation, road mortality, poaching, and invasive predators such as bullfrogs have led to declines of this species. ACECs with pond turtle populations and good quality habitat should be prioritized for designation and management. 17. <a href="https://ecos.fws.gov/ecp/species/1833">https://ecos.fws.gov/ecp/species/1833</a> 18. <a href="https://ecos.fws.gov/docs/recovery_plan/WPT%20RCC%20Strategy%202020.pdf">https://ecos.fws.gov/docs/recovery_plan/WPT%20RCC%20Strategy%202020.pdf</a>	The BLM coordinates closely with USFWS to conserve and restore listed species populations. In the Redding Field Office, much of the habitat where pond turtles are found are within existing (e.g., Sacramento River Bend) or proposed ACEC's. Concerns regarding invasive predators and habitat connectivity are addressed throughout the document, though not with specific reference to western pond turtles.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - lands and realty	Management for essential connectivity corridors should be specified, and we would support efforts by the BLM to pursue land allocations and/or water rights to benefit wildlife habitat, including big game and riparian habitat, in order to expand wildlife and sensitive species linkages.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1 and we identify acquiring water rights to protect sensitive resources under Water Resources in Table B-1, beginning Row 19.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - lands and realty	We fully support the prioritization of acquiring new lands along key riparian corridors to improve riparian connectivity, in critical deer winter range, wetland habitat, wildlife migration corridors, coastal areas, habitat for sensitive species, WSR corridors, lands that would enhance recreation access or opportunities, lands within or nearby wilderness, WSAs, and LWCs, parcels needed to improve efficiency for long-term resource management of other BLM-administered areas, lands that improve water quantity and water quality, lands with high-value cultural resources, and lands with significant paleontological resources. We object to the provision in the plan that proposed acquisitions will only proceed with the support of county boards of supervisors. Although a county's position should be considered as part of local consultation and integral in the approval process, they should not have veto power over acquisitions that are supported by local community members and landowner(s). We recommend this language be updated to emphasize the importance of county outreach and input to the process without an acquisition being contingent upon their approval.	Revisions have been made to the analysis in the RMP/EIS. The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows applicable updates in Lands and Realty - Land Tenure Section D.3.2.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	Although not required by law for these 2(a)(ii) rivers, there is nothing prohibiting the BLM from development Comprehensive River Management Plans (CRMPs) for its pre-1986 rivers. CRMPs are an essential management tool to protect the free-flowing condition and outstanding values of protected rivers. As part of the conformity review, the BLM should determine if any of its 2(a)(ii) segments would benefit from the development and implementation of a CRMP. For example, the Trinity WSR is an increasingly popular recreation destination, flows through a mixture of federal and private lands, and is the target of a large-scale fish habitat restoration program. It is an ideal candidate for the development and implementation of a CRMP.	Reviews under WSRA Section 3(d)(2) are not required for WSR designated rivers under WSRA Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers however, nothing precludes the BLM from doing so in the future if the opportunity arises. While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers. The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	CalWild's NCIP scoping comments and detailed response to the 2018 WSRs Eligibility Inventory cited numerous additional ORVs for the BLM segments of the Klamath, Trinity, Middle Eel, NF Eel, and main stem Eel WSRs. The table below summarizes the existing WSR segments and the need to document an updated anadromous fish ORV and potentially new ORVs, all based on changed circumstances. Updated and Proposed New ORVs for 2(A)(II) Rivers Klamath WSR: Update Anadromous Fish ORV; Recreation; Culture; Ecology Trinity WSR: Update Anadromous Fish ORV; Scenery; Recreation; Culture; History; Ecology; Science/Research Middle EEL WSR: Update Anadromous Fish ORV; Scenery; Recreation; Wildlife; Culture; Ecology NF EEL WSR: Update Anadromous Fish ORV; Scenery; Recreation; Wildlife; Culture; Ecology SF EEL WSR: Update Anadromous Fish ORV; Scenery; Recreation; Wildlife; Culture; Ecology/Botany; Science/Research EEL (Main Stem WSR): Update Anadromous Fish ORV; Scenery; Recreation; Cultural; Ecology For details and citations, we hereby incorporate by reference CalWild's scoping comments dated May 14, 2022 (pgs. 54-72) in response to the 2018 Wild and Scenic River Inventory. Recommendations: Update the anadromous fish ORV based on new data, status, and changed circumstances affecting the existing 2(a)(ii) rivers flowing through BLM-managed public lands. Identify new ORVs for these segments based on changed circumstances since they were designated in 1981.	Reviews under WSRA Section 3(d)(2) are not required for WSR designated rivers under WSRA Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers, however, nothing precludes the BLM from doing so in the future if the opportunity arises. While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers. The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	Recommendations: Include in the final plan/FEIS the legally required conformity review of corridor boundaries, segment classifications, and management plans for all 2(a)(ii) segments designated prior to 1986. Make a commitment during NCIP plan implementation to update the South Fork Eel Management Plan as needed. Consider developing a CRMP for pre-1986 rivers that would benefit the most from such a planning process, such as the Trinity WSR.	Reviews under WSRA Section 3(d)(2) are not required for WSR designated rivers under WSRA Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers however, nothing precludes the BLM from doing so in the future if the opportunity arises. While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers. The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	There are several promising references in the DEIS to enhancing recreation opportunities on the Eel River WSR such as prioritizing efforts to improve and enhance sustainable public access to "landlocked" BLM parcels as is mostly the case for English Ridge. We thank you for those, and request that the ROD commit BLM to working with tribes, the MNF, the four Eel River watershed counties, other agencies, boaters and other recreationists, The Wildlands Conservancy, Great Redwood Trail backers, PG&E, and potentially many others, to take a fresh look look at improving the sustainable recreation opportunities available on the entire length of the stream that once was-and hopefully will be again after much restoration and recovery-California's third largest fishery.	Information about opportunities to work with partners on regional trail networks has been added to the Recreation Section in Table B-1.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	<p>As discussed in the ACEC section of these comments we very much welcome and strongly support the draft NCIP's proposal under both alternatives B and D to establish a North Fork Eel River ACEC with the management framework described above.</p> <p>However, as we did in scoping we request once again that the BLM assess the parcel's wilderness characteristics in tandem with adjacent wilderness-quality lands in the SRNF that themselves adjoin the existing North Fork Eel River Wilderness. In the NCIP LWC inventory the BLM found that the parcel failed to meet the minimum size-criteria for LWCs despite the fact that it is part of a roughly three-mile unbroken stretch of wilderness-eligible USFS and BLM lands connected to the North Fork Eel River Wilderness upstream. Note that the parcel and adjacent National Forest lands are proposed as additions to the North Fork Eel River Wilderness by S. 1776 and HR 3700. We urge the BLM to take this all-lands approach when considering the wilderness-characteristics of the North Fork Eel River ACEC. As is noted above in the NWPS section of these comments, the BLM already jointly manages the Yuki and Yolla Bolly-Middle Eel Wilderness Areas with the USFS so we are perplexed by the agency's refusal to apply such a standard to LWC as well.</p> <p>As is shown on page 2-197 of the DEIS, under alternative B the 6,640-acre Sacramento River Bend LWC unit would be managed as LWC "with wilderness characteristics managed to protect wilderness characteristics as a priority over other multiple uses." The DEIS under alternative D as shown on page 2-198 would manage the LWC "with wilderness characteristics managed to minimize impacts to wilderness characteristics while emphasizing other multiple uses."</p> <p>We strongly support the proposed expanded ACEC and its proposed management under alternative B. Given the Sacramento River Bend's popularity with mountain bikers, we do not support LWC management that would prohibit cycling such as proposed in alternative B. Instead, we support alternative D for the LWC portion of the Sacramento River Bend region with wilderness characteristics managed to "minimize impacts to wilderness characteristics while emphasizing other multiple uses."</p>	The BLM followed guidance provided in BLM Manual 6310 - Conducting Wilderness Characteristics Inventory on BLM Lands (USDI BLM 2021). This policy states that FS roadless areas not designated as recommended wilderness cannot be included in determining the size criteria for wilderness characteristics.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	<p>The BLM manages segments of the Klamath, Trinity, NF Eel, Middle Eel, SF Eel Rivers, and main stem Eel in the NCIP region, totaling 51.9 miles.<sup>4</sup> These state-protected rivers were administratively added to the National Wild and Scenic Rivers System under section 2(a)(ii) of the NWSRA in 1981. Except for an outstandingly remarkable whitewater recreation value identified for the Middle Eel, the only other originally identified outstandingly remarkable value for these rivers is their anadromous fish.<sup>5</sup></p> <p>4. NCIP DEIS Vol. I, Table 3-84, pg. 3-437.</p> <p>5. Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System, Vol. I, pgs. P-3 to 4, USDI December 1980; Approval for Inclusion in the National Wild and Scenic Rivers System as State Administered Components, Federal Register Vol. 46, No. 15, Friday January 23, 1981, pg. 7484.</p> <p>The DEIS asserts that the anadromous fishery ORV for these rivers is for winter-run steelhead and the whitewater boating value is not outstandingly remarkable.<sup>6</sup> Both assertions are incorrect. The 1980 FEIS documenting the federal designation of state rivers clearly cite multiple anadromous fish species that comprise the rivers' outstandingly remarkable cold-water fisheries, including king (chinook) salmon, silver (Coho) salmon, steelhead - including unique populations of spring run steelhead (now known as summer steelhead) in the Klamath-Trinity-Eel systems - as well as other anadromous species such as cutthroat trout, green sturgeon, and white sturgeon.<sup>7</sup> In addition, the Middle Eel's whitewater recreation ORV is also well documented in the 1980 FEIS. 6. NCIP DEIS Vol. I, pg. 3-436. 7. USDI Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System, FEIS Vol. I, December 1980, pgs. III-37 to 38.</p> <p>6. NCIP DEIS Vol. I, pg. 3-436.</p> <p>7. USDI Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System, FEIS Vol. I, December 1980, pgs. III-37 to 38.</p> <p>Since the state rivers were added to the federal system, many of the anadromous species that comprise the fisheries ORV have declined and have been listed as threatened or endangered. This underscores the importance of continued protection these species and their habitat. The threatened and endangered status of these stocks, coupled with climate change, clearly represents changed circumstances that warrant revising the description of the anadromous fish value.</p> <p>16 USC Section 1274(d)(2) of the National Wild and Scenic Rivers Act (NWSRA) requires a conformity review of boundaries, classifications, and river management plans during the planning process for rivers designated prior to 1986 (which applies to the BLM's WSR segments in the NCIP). There is no indication in the NCIP DEIS indicating such a review has been completed.</p> <p>Recommendations: Revise NCIP FEIS Vol. I on page 3-436 to reflect the multiple species of anadromous fish that comprise their fisheries ORV and include the most recent information on the status of these species and their habitat. Add the whitewater recreation ORV for the Middle Eel WSR. Document in the FEIS the conformity review of existing WSR boundaries and plans as required by 16 USC Section 1274(d)(2).</p>	<p>This table is listing the general ORV label. For more specific information about ORVs please see the write up in the suitability and eligibility reports. Whitewater recreation has been updated to reflect its importance and existence on the MF Eel River. Reviews under WSR Section 3(d)(2) are not required for WSR designated rivers under WSR Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers however, nothing precludes the BLM from doing so in the future if the opportunity arises. While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers. The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	<p>Specially-managed areas with high conservation values, such as lands with wilderness characteristics, backcountry recreation areas and ACECs, should be managed as VRM I and II to protect scenic values. the visual resources present in the NCIP area are notably diverse, including ocean landscapes, dunes, forests, rolling hills, mountains, snow- covered peaks, flat valleys, oak savannah, numerous rivers - including designated wild and scenic rivers - and reservoirs. These visual resources are highly valued by area residents and visitors. Therefore, we request that the following ACECs be changed to a VRM class II in the ROD to align with BLM policy to protect the quality of the scenic (visual) values of these lands.:</p> <ul style="list-style-type: none"><li>- Baker Cypress ACEC</li><li>- Butte Creek ACEC</li><li>- Gilham Butte ACEC</li><li>- Hawes Corner ACEC</li><li>- Iaqua Butte ACEC</li><li>- Lacks Creek ACEC</li><li>- Sacramento Island ACEC</li><li>- Sacramento River Bend ACEC (just WSR corridors)</li><li>- Shasta and Klamath River Canyon ACEC</li><li>- Grass Valley Creek ACEC (north of Highway 299)</li><li>- Swasey Drive Clear Creek Greenway ACEC</li><li>- Black Mountain ACEC</li><li>- Upper Klamath Bench ACEC</li><li>- Upper Mattole ACEC</li></ul>	Scenic values are not identified as R&I values for which these ACECs are designated, and therefore, VRM III is consistent with the VRI inventory, medium sensitivity, and BLM policy.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - new special designation nominations	<p>State rivers added to the federal system under 2(a)(ii) are to be managed by the state, but the law grants no state authority over the management of federal land in designated river corridors. This creates ambiguity over which agency should be implementing the intent of federal law to protect the free-flowing condition and outstanding values of 2(a)(ii) rivers. In response to the federal designation of these state rivers, the California Legislature significantly modified state management of its protected river system by delineating the protected area as the river up to the first line of permanent riparian vegetation and eliminating the management plan requirement. Due to these changes, state rivers are largely self-administering in California. The Forest Service co-manages with the BLM 2(a)(ii) segments of the Klamath, Trinity, Middle Eel, NF Eel, and main stem Eel. To clarify administration and federal jurisdiction over the rivers where they flow through federally-managed public lands, the Forest Service has recommended legislative redesignation of its 2(a)(ii) river segments in northwest California.<sup>9</sup></p> <p>9. Klamath National Forest FEIS Record of Decision, USDA Forest Service July 1995, pg. 3; Mendocino National Forest FEIS Record of Decision, USDA Forest Service July 1995, pg. 6; Six Rivers National Forest FEIS Record of Decision, USDA Forest Service June 1995, pg. 5; Shasta-Trinity National Forest Plan, FEIS Record of Decision April 1995, pg. 8.</p> <p>Recommendations: To improve joint management of these river segments with the Forest Service and to clarify BLM jurisdiction to managed 2(a)(ii) segments on federal public lands, the BLM should recommend legislative redesignation for its 2(a)(ii) rivers in the final NCIP.</p>	It is out of scope of this plan to recommend redesignation legislatively. No changes have been made. The USFS, NPS, and the BLM utilize an MOU to closely coordinate management of 2(a)(ii) rivers.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - soils	<p>We greatly appreciate measures to restrict grazing in areas of higher botanical value such as ACECs, and certain sensitive soil types. We would recommend that Alternatives B and D should include language to indicate specifically that grazing would be unavailable in areas of ultramafic/serpentine soils and biological soil crusts in addition to decomposed granite soils.</p>	Revisions have been made to clarify management direction in the RMP/EIS. The Proposed RMP/Final EIS includes an update to management direction in Table B-I, that directs the BLM to implement measures to minimize effects to soil crusts at the implementation level.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - soils	We fully support the closure of areas with decomposed granite soils, ultramafic/serpentine soils, and biological soil crusts to surface disturbance. The importance of biological soil crusts has been underappreciated in many planning documents, and the requirement that pre-construction assessments for these sensitive soils allow for the preservation of the valuable ecosystem services that they provide. These assessments could also be used to determine the presence of decomposed granite and ultramafic/serpentine soils, allowing for avoidance or mitigation of impacts to these soil types where not provided protections from other land designations. The protections provided in alternative D could be strengthened by including the exclusion of mineral materials development within the floodplain as in Alternative B. Including a ROW exclusion for the Gilham Butte ACEC in Alternative D could help to reduce potential impacts to the ultramafic/serpentine soils found here, and to the diversity of rare plant species that depend on these sensitive soils. 15. Belnap, J., 2003. The world at your feet: desert biological soil crusts. <i>Frontiers in Ecology and the Environment</i> , 1(4), pp.181-189.	In the Proposed RMP/Final EIS, the BLM would not prohibit mineral materials development in the active floodplain; however, site specific assessments would be completed for all mineral materials projects, which would account for the active floodplain and the BLM would make a determination at that time to approve activities or not depending on the natural and cultural resource constraints. Additionally, the Proposed RMP/Final EIS includes ROW avoidance for the Gilham Butte ACEC; however, exclusions may be put in place at the implementation level as the result of site-specific assessments that determine the presence of sensitive soils or other natural and cultural resource constraints
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	Because of Gilham Butte's tremendous ecological importance we strongly support the ACEC expansion proposed in alternatives B and D, the management guidelines for the ACEC provided in alternative B, and the WSA designation proposed in B. As we request above in the WSA section of our comments, please use best available science, professional expertise, commonsense, and a spirit of collaboration to thread the needle with the NCIP ROD and resolve any perceived conflicts between WSA and ACEC management for Gilham and any truly practicable measures designed to protect and restore ecological health, where needed.	The action alternatives were devised as a result of a comprehensive analysis and review by the BLM Interdisciplinary Team that took into account various factors, including input from the public during public scoping periods, inventory of current conditions, potential management opportunities and constraints, technical feasibility, environmental impacts, and best available science. ACEC designations emphasize that special management is needed to protect Relevance and Importance (R&I) values. Gilham Butte ACEC proposed management can be found in Table B-1 and in Volume 3, Appendix G, ACEC Report. Gilham Butte lands have also been inventoried as meeting Lands with Wilderness Characteristics criteria and are proposed to be managed as Lands with Wilderness Characteristics to protect wilderness characteristics as a priority over other multiple uses. Special management for LWC designations areas can be found in the Alternatives Matrix, Table B-1. Where special designations overlap, the area would be managed under the more conservative designation, such as VRM II provided by lands with wilderness characteristics. We believe the expanded ACEC and lands with wilderness characteristics, provides the best suite of protection of R&I values and wilderness characteristics, while balancing the needs of resource protection and uses.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	The [Laqua Buttes] ACEC contains late-seral forest in a region where most such habitat on private lands has been eliminated. We support the management proposed in alternative D because we believe that it will protect the area's ancient forest. We request that BLM include the alternative D proposal for this ACEC [Laqua Buttes] in the NCIP ROD.	The Proposed RMP/Final EIS includes carrying forward the Laqua Buttes ACEC for the protection of R&I values that includes late-seral forest protection.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	The Butte Creek ACEC contains late-seral Douglas-fir forest in a region where most such habitat on private lands has been eliminated. The Butte Creek ACEC is therefore of immense ecological value and we support the management proposed in alternative D because it will protect the area's ancient forest. We request that BLM include the alternative D proposal for this ACEC in the NCIP ROD.	The Proposed RMP/Final EIS includes carrying forward the Butte Creek ACEC for protection of R&I values that includes late-seral forest protection.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	The Red Mountain LWC unit's unique ecological, historic, and geological values make it a prime candidate for WSA designation. We applaud the proposed establishment of Red Mountain WSA because it will help to durably protect the former private land until such time as Congress can add it to the NWPS by passing S. 1776 and HR 3700. We thank the BLM as well for making improved access to the South Fork Eel River Wilderness a "priority" given that, like so many AFO parcels, it has historically had very limited legal access. We urge the BLM to include the proposed WSA in the final ROD.	The Proposed RMP/Final EIS identifies Section 202 WSAs and how they will be managed as described in Table B-1.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the management proposed in alternative D because we believe that it will protect the area's very popular recreation opportunities, cultural resources, and oak forest and other important lowland habitat in a region that has been fragmented by urban development. We request that BLM include the alternative D proposal for this ACEC [Swasey Drive] in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 for ACECs.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	The proposed [Ma-le'l Dunes] ACEC expansion area contains the same regionally significant plant communities and cultural resources as the existing ACEC. We request that BLM include the designation of this ACEC and its proposed management under alternative D in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We request that BLM include the designation of this 173 acre ACEC [Corning Vernal Pools] and its proposed management under alternative D in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We request that BLM include the designation of this ACEC [Upper and Lower Clear Creek] and its proposed management under alternative D in the NCIP ROD because it will help protect and improve anadromous salmonid habitat and the scenic values of the Clear Creek canyon.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We request that BLM include the designation of this ACEC [Upper Mattole] and its proposed management under alternative D in the NCIP ROD in order to protect anadromous fish habitat, scenery, and recreation opportunities, and so that the BLM can work over time to promote late-seral forest conditions.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We request that BLM include the designation of this ACEC [North Fork Eel River] and its proposed management under alternative D in the NCIP ROD in order to protect the North Fork Eel WSR and its anadromous fish habitat, scenery, and recreation opportunities.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the designation of Black Mountain as an ACEC in alternative D because it will protect old-growth forest and other important wildlife habitat, unique geologic features, and cultural resources and we request that BLM include it in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the designation of this ACEC [Sheep Rock] as it falls within an identified Essential Connectivity Corridor of High Biological Value and is a migration corridor for the east Shasta Valley elk herd, which winters in the region. It is also home to nesting golden eagle, prairie falcon, and peregrine falcon. The historic Yreka Trail passes through the proposed ACEC. We request that BLM include the designation of this ACEC and its proposed management under alternative D in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the establishment of the proposed ACEC [South Spit] because it will: - Maintain natural dune processes - Maintain archaeological sites - Prioritize acquisition within the South Spit area We request that BLM include the designation of this ACEC and its proposed management under alternative D in the NCIP ROD.	The area is owned by CDFW and managed by BLM under cooperative management agreements to protect conservation and recreation access values for which it was acquired. While the BLM is not authorized to designate an ACEC unless the BLM owns the property in fee, upon any portion of future acquisition in the proposed action area shown in Appendix G, ACEC Report, South Spit Figure 32. The NCIP RMP would then confer designation of ACEC without further planning. Until such time, the BLM would continue to manage to protect the R&I values identified for the proposed ACEC.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the expansion of the ACEC [Shasta and Klamath Rivers Canyon] and the management guidelines proposed under alternative D and we request that BLM include it in the NCIP ROD to help protect rare and sensitive riparian and fisheries habitat values.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the management proposed in alternative D because we believe that it will protect the area's rare valley oak-riparian woodland and habitat for anadromous fish, western yellow-billed cuckoo, and other species of concern. We request that BLM include the alternative D proposal for this ACEC [Sacramento Island] in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the proposed Upper Burney Dry Lake and Baker Cypress ACEC and the management guidelines proposed under alternative D and we request that BLM include them in the NCIP ROD to help protect the rare Baker cypress and other sensitive species.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the retention of the ACEC [Forks of Butte Creek] and its proposed management under alternative D because it will help to protect Butte Creek's scenic values, cultural resources, and fisheries. We request that BLM include the alternative D proposal for this ACEC in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the retention of the ACEC [Deer Creek] and its proposed management under alternative D because it will help to protect cliff-habitat for raptors such as the peregrine falcon, critical habitat for spring-run Chinook salmon, cultural resources, recreational opportunities, and scenic values. We request that BLM include the alternative D proposal for this ACEC in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support the retention of the ACEC [Hawes Corner] and its proposed management under alternative D because it will help to protect slender Orcutt grass and habitat connectivity for deer and other wildlife impacted by nearby urban development. We request that BLM include the alternative D proposal for this ACEC in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1 for ACEC.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We support this ACEC and its management proposed under alternative D because: - Willis Ridge contains important late-seral forest habitat - Willis Ridge, like English Ridge to the east, is a rare BLM holding in a part of the Eel River watershed that is dominated by private land - Willis Ridge and English Ridge are important habitat connections for wildlife such as the NSO - The Eel River WSR at the eastern base of Willis Ridge contains habitat for threatened salmon and steelhead We request that BLM include the designation of this ACEC and its proposed management under alternative D in the NCIP ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward to protect the Relevance and Important Values identified for each proposed ACEC in Section D.4.1.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - special designations	We urge the BLM to include the proposed Trinity Alps WSA in the final ROD.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 for Section 202 WSAs.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - vegetation	The desired conditions for Douglas-fir and tanoak dominated forests should be clarified to indicate the desired level of reduction in tanoak populations and to substantiate the rationale for removing currently healthy trees. Does published research show that the desired conditions described are likely to reduce the spread of sudden oak death? Is there a clear ecological benefit to the proactive removal of trees? Is the goal of these treatments to protect certain populations of tanoak, or to prevent the spread to other susceptible species? The benefits of the desired conditions and the reasoning for proactive removal of trees could be explained in more detail in the EIS.	Clarification on desired condition of Douglas-fir tanoak forests has been provided in Table B-1. Desired condition maintains a tanoak component but thins stands to improve forest health and resiliency.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - vegetation	Chaparral communities are adapted to infrequent, often stand replacing, high intensity wildfires. Treatments to reduce the severity and intensity of wildfire in chaparral habitats may not offer benefits to their health or ability to regenerate post fire, and may cause unintended consequences that could be detrimental to the persistence of chaparral. The disturbance caused by fuel reduction treatments in chaparral could create opportunities for the establishment and/or spread of invasive annual species. The presence of these easily ignitable species provides fuels that have been shown to greatly increase the risk of reduced fire return intervals. This can greatly increase the chance of functional type conversion through the loss of obligate seeding species with a single reduced interval fire event. The loss of resprouting species as a result of reduced interval can lead to vegetation type conversion and the loss of chaparral habitat entirely. These communities have evolved to recover from high severity fires leading to the loss of all aboveground vegetation, through seed that can lay dormant in the seedbank for decades or more, and species that are able to resprout from carbohydrates stored below ground. The Management Direction for chaparral outlined in row 47 mentions the use of mechanical vegetation treatments to promote regeneration, however mechanical treatments would only allow for the regeneration or resprouting species and could induce a functional type conversion through the loss of obligate seeding species which require fire to induce the germination of their seed. The ability for chaparral to recover from high severity fire, the historic fire return intervals that chaparral has evolved with, and the risk of vegetation treatments not having a clear ecological benefit all need to be carefully analyzed when considering fuel treatments in chaparral shrublands.	<p>The NCIP in Fire/ Fuels, Forestry, and Vegetation sections speak to long term monitoring of vegetation distributions, assessment of effects related to management actions, and evaluating changing vegetation communities in response to disturbance such as wildfire. The NCIP does not propose specific fire ecology studies to evaluate RMP effectiveness as this proposal would be most effective on a project or implementation level analysis.</p> <p>The BLM employs ecologists, foresters, botanists, and fire managers who specialize in ecological process, productivity, and biodiversity on public lands as they relate to proposed management actions or large-scale disturbance. The NCIP is designed to give general guidelines for vegetation types but leave site specific treatments to the implementation level.</p> <p>However, the BLM acknowledges and recognizes the role of fire in chaparral ecology, as discussed in Section D.2.8.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - visual resources	Wilderness Areas and WSAs must be managed under VRM class I per BLM guidance (Instruction Memorandum No. 2000-096 (2009)). We would like further clarification as to why some ACECs are managed as VRM class II and others as class III in the DEIS.	ACECs are designated based on R&I values and VRM classes are assigned accordingly.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	As we requested in the case of the English Ridge proposed WSA, please use best available science, professional expertise, commonsense, and a spirit of collaboration to thread the needle with the NCIP ROD and resolve any perceived conflicts between WSA management for Gilham and any truly practicable measures designed to protect and restore ecological health, where needed, in the WSA.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Appendix B, Table B-1, beginning row 333 for WSAs, row 323 for WSRs, and row 347 for Lands with Wilderness Characteristics managed as a priority over other uses, and row 250 for ACEC.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	Beegum Creek As discussed in the ACEC section of these comments below we very much welcome and strongly support the draft NCIP's proposal under both alternatives B and D (as shown on page 2-7 of the DEIS) to include all of the RFO's Beegum Creek holdings in a new 4,380-acre Beegum Creek Gorge ACEC. Having said that, the BLM found that the parcel failed to meet the minimum size-criteria for LWC. As we did in scoping, we ask again that you consider the roughly 2,800-acre roadless BLM lands as part of a contiguous block of wilderness-eligible land of over 9,000 acres jointly managed by BLM and the adjacent STNF. The roadless BLM parcel and the STNF's East Beegum Inventoried Roadless Area "seamlessly" share Beegum Creek and its many values documented so well in the ACEC and WSR portions of the DEIS. Over the years we have heard BLM and USFS officials talk about taking a more holistic "all lands approach" when it comes to addressing key issues where National Forests and BLM holdings come together such as in the AFO and RFO. We urge the BLM to take this all-lands approach when considering the wilderness-characteristics of the Beegum Gorge. This is precisely the approach you currently use in managing the wilderness character of the Yuki Wilderness and Yolla Bolly-Middle Eel Wilderness, which we rightly praise in our DEIS NWPS comments above.	The BLM followed guidance provided in BLM Manual 6310-Conducting Wilderness Characteristics Inventory on BLM Lands (USDI BLM 2021). This policy states that USFS roadless areas not designated as recommended wilderness cannot be included in determining the size criteria for wilderness characteristics. Throughout the Proposed RMP/Final EIS the BLM highlights our desires to work collaboratively with Tribes, agencies, and partners, which addresses the USFS' "all-lands" approach.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	<p>Cahto Peak The DEIS under alternative B as shown on page 2-9 proposes to manage Cahto Peak as LWC "with wilderness characteristics managed to protect wilderness characteristics as a priority over other multiple uses."</p> <p>The DEIS under alternative D proposes to manage Cahto Peak as LWC "with wilderness characteristics managed to minimize impacts to wilderness characteristics while emphasizing other multiple uses" as shown on page 210. We suspect that one of the reasons for the proposal in alternative D is to facilitate continued efforts by BLM and the Cahto Tribe to remove small conifers and restore oak woodlands on Cahto Peak. We have visited the area many times and understand that the oaks there have suffered from conifer encroachment resulting from decades of fire suppression. Crews have been removing and pile-burning small conifers and using cultural burns to benefit the small, oak studded grasslands just north of Cahto Peak. As with English Ridge, we encourage the final NCIP ROD to allow such restoration work, where necessary, in both LWCs and WSAs so long as no new road construction is allowed and the chainsaw use is for the purposes of restoring "good fire" to the area over time. We therefore request the selection of alternative B, but with the proviso that the oak woodland restoration efforts with the Cahto Tribe be permitted to continue in the future.</p>	<p>The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1, beginning row 333 for WSAs, row 323 for VSRs, and row 347 for Lands with Wilderness Characteristics managed as a priority over other uses, and row 250 for ACEC.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	<p>Yolla Bolly (Subunits 1, 2, and 3) As is shown on page 2-9 of the DEIS, under alternative B, 210 acres of the proposed Yolla Bolly-Middle Eel Wilderness Additions included in S. 1776 and HR 370 would be designated as a WSA. Also as is shown on page 2-9 under alternative C 230 acres of the Yolla Bollies would be managed as LWC "with wilderness characteristics managed to protect wilderness characteristics as a priority over other multiple uses."</p> <p>We support the proposed WSA recommended under alternatives B because it will help to durably protect the 210 acres until such time as Congress can add it to the Yolla Bolly-Middle Eel Wilderness by passing S. 1776 and HR 3700. We urge the BLM to include the proposed WSA in the final ROD.</p>	<p>The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1, beginning row 333 for WSAs.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	<p>As discussed in the ACEC section of these comments we very much welcome and strongly support the draft NCIP's proposal under both alternatives B and D (as shown on page 2-7 of the DEIS) to include all of the AFO's Eden Valley holdings in a new 10,810-acre "Eden Valley ACEC." The proposed ACEC includes both the 4,600 acres proposed for Eden Creek LWC and then ACEC designation proposed by CalWild as well as the existing 6,150-acre Eden Valley WSA to the south.</p> <p>The roughly 4,600 acres of BLM around Eden Creek failed to meet the minimum size-criteria for LWCs because it is 5,000 acres in size. We urge the BLM to reconsider the finding and to identify the Eden Creek lands as LWC because:</p> <ul style="list-style-type: none"><li>- Of the area's superlative habitat for rare and uncommon plants</li><li>- Of the Eden Creek proposed WSR's importance to wildlife, including steelhead trout in the Elk Creek proposed WSR downstream</li><li>- It is an integral part of a growing portfolio of BLM and MNF parcels in the Elk Creek watershed</li><li>- The AFO is in the process of acquiring private lands adjacent to Eden Valley along the Elk Creek proposed WSR</li></ul> <p>- The 5,000-acre threshold is not a requirement. According to the BLM's key partners at the University of Montana who maintain the <a href="http://www.wilderness.net">www.wilderness.net</a> site, as of this writing there are 89 units of the NWPS that are less than 5,000 acres in size in the US and three in California, including the BLM's 1,530-acre Saddle Peak Hills Wilderness</p> <p>NEPA imposes a continuing obligation on BLM to take a hard look at new circumstances and information (see 40 C.F.R. §§ 1500.1 and 1502.9) relevant to environmental impacts of proposed actions. Arcata BLM's Elk Creek acquisition is currently in process and represents new circumstances relevant to the management and designation of LWC. With this new acquisition, we recommend that the BLM complete an LWC inventory, and if it is found to be eligible, add these to the existing Eden Creek inventory and manage the entire area as LWC except for the access road running from Elk Creek to Eden Valley Ranch and the access road running along Elk Creek that we understand BLM may use to facilitate restoration.</p> <p>The Elk Creek watershed has no designated trails on either the MNF or on BLM, and the access roads are not open to vehicles driven by the public because adjacent landowners do not allow such access. Thanks to the MNF's acquisition of lands upstream along Elk Creek in the Yuki Wilderness and now in light of the BLM's pending acquisition along the stream, we ask that the NCIP commit to working with the MNF and others as needed to establish trails in the Yuki Wilderness, which currently has no official trails. Old roads on the recent MNF and BLM acquisitions in the Elk Creek watershed could be the start of such a first-ever Yuki Wilderness trail system. Note that S. 1776 and HR 3700 proposes to add the NCIP's Eden Valley ACEC to the nearby Yuki Wilderness and to designate Eden Valley Creek and Elk Creek as WSRs while leaving the two access roads open for BLM administrative use.</p>	<p>Eden Creek failed to meet the size-criteria for lands with wilderness characteristics and will be designated as ACEC in the Proposed RMP/Final EIS to protect R&amp;I values as listed in the comment which includes protecting rare plants. If it does meet size requirement due to future acquisition, then it would be re-inventoried. The BLM will continue to work with partners on implementation level projects and work to improve access.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	<p>We request that the NCIP ROD protect English Ridge's wilderness characteristics in as durable a fashion as possible until such time as Congress can add it to the NWPS. Protecting this area has been a long fight. While both alternatives B and D are likely to protect the area until it becomes the "English Ridge Proposed Wilderness" and a unit of the NWPS, given English Ridge's ecological importance, current and potential recreational importance, long wilderness candidacy, and other reasons offered below, we believe that WSA designation is the BLM's best and most durable administrative tool available for ensuring that this particular LWC's wilderness characteristics are preserved.</p>	<p>The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 for Section 202 WSAs.</p>



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wilderness/wsa/lwc	<p>We concur with the BLM's conclusion that these areas are LWC, and we are pleased with the high-quality LWC inventory included in the draft NCIP. We do ask that the wilderness character of the following areas be reconsidered, however, for the reasons described below:</p> <ul style="list-style-type: none"><li>- A portion of the proposed Beegum Gorge ACEC</li><li>- Eden Valley</li><li>- The proposed North Fork Eel River ACEC</li></ul> <p>Due to changed circumstances, we withdraw the request made in our NCIP scoping comments that the roughly 273-acre BLM parcel on Salt Creek in Trinity County be identified as LWC. Note also that the parcel is no longer proposed as an addition to the North Fork Wilderness in HR 3700/S. 1776. Note also that the legislation will not only enlarge the North Fork Wilderness, but it will also rename it the "North Fork Eel River Wilderness" (<i>italics added</i>) in response to suggestions made by members of the Round Valley Indian Tribes to Representative Huffman almost a decade ago.</p>	<p>The BLM Interdisciplinary team has taken the recommendation into consideration and acknowledge the commenters removal of their recommendation for the 273-acre parcel on Salt Creek in Trinity County. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1 of Appendix B for lands with wilderness characteristics managed as a priority over other use.</p> <p>The BLM followed guidance provided in BLM Manual 6310-Conducting Wilderness Characteristics Inventory on BLM Lands (USDI BLM 2021). This policy states that USFS roadless areas not designated as recommended wilderness cannot be included in determining the size criteria for wilderness characteristics.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wildlife	<p>Critical habitat occurs in the planning area for this federally threatened seabird. They are highly dependent for nesting in late successional forest habitats that include old growth and mature forests. The seabirds fly from forested nesting sites to the Pacific Ocean for foraging, and collision risks with tall infrastructure such as wind energy projects and transmission lines is a growing concern. Therefore, we strongly support the maximum acreage of Right of Way exclusion zones in marbled murrelet habitat and flight zones.</p>	<p>BLM will always consider resource values when assessing proposed ROWs, with careful consideration for Federally listed species. As mandated by the ESA, BLM is required to determine the affects to any listed species for any project, including proposed ROWs, within designated critical habitat and will work to minimize any potential take in consultation with USFWS.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wildlife	<p>Critical habitat occurs in the planning area, and BLM should adopt management actions to sustain habitat to support Pacific marten populations.</p>	<p>Forestry management as described in Table B-1 for late-successional reserves includes habitat management for this species.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wildlife	<p>Fishers are found in low- to mid-elevation mature forests with complex habitat features including old-growth characteristics, moderate to dense forest canopies, large-diameter trees, coarse downed wood, large snags, tree cavities, and deformed trees. Fishers are obligate users of tree or snag cavities for denning and resting. This should be emphasized in best management practices. From the DEIS, Appendix D-8, covers some of this, but we would like to see more detail:</p> <p>D.2.8 Late Successional Forest (Northern Spotted Owl, Pacific Fisher, Marbled Murrelet)</p> <ul style="list-style-type: none"><li>- Manage forest stands for late successional characteristics such as uneven-aged and multilayered canopy.</li><li>- Snags greater than 12" DBH shall be retained on project sites for cavity dependent wildlife species whenever possible. Large trees with large cavities, mistletoe clumps, broken tops, deformed branches, and long lateral branches will be maintained for nesting, resting, and roosting sites.</li><li>- Maintain a minimum of 60% canopy closure with patches exceeding 80% canopy closure.</li><li>- Maintain brushy islands and corridors for dispersal/movement paths for Pacific fishers and other wildlife.</li></ul>	<p>The desired outcomes expressed in the comment are largely determined at the project level. As the commenter noted, many characteristics of high-quality fisher habitat are expressly called out via BMP's. Still others, such as retention of complex, large diameter trees and contiguous patches of riparian and other forest types, are called out in Forestry and Vegetation management sections.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wildlife	<p>Roosevelt elk and tule elk (<i>Cervus canadensis roosevelti</i> and <i>C. c. nannodes</i>) both occur in the NCIP area. Interbreeding between the two subspecies occurs in Eden Valley. Despite being hunted through most of California, these native elk subspecies have high value for helping to restore coastal prairies, valley grasslands, oak woodlands, and other native habitats, and management conservation measures should be developed to help elk populations expand into former habitat and maintain genetic diversity. Migratory corridors should be identified and maintained for elk, and the return of natural wolf predation planned for. We support the designation of Eden Valley ACEC to protect elk habitat. Rocky Mountain elk (<i>C. c. nelsoni</i>) were historically native to the Modoc Plateau and eastern slopes of the Cascades and northern Sierra Nevada. We have observed elk gradually moving southwards into the northern Sierra Nevada, and this subspecies should be added to the NCIP planning area as a wildlife species to be managed.</p>	<p>See Table D-27 and management actions pertaining to elk and big game.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wildlife	The DEIS says that recently California condors were sighted at Lacks Creek ACEC (Appendix D-31). Before reducing the acreage of this ACEC, BLM should undertake a study of condor use patterns, foraging habitat, and roosting areas in the region. The Yurok Tribe has been actively releasing condors into the wild, and these birds are expected to gradually use NCIP area habitats.	The BLM works with the Yurok Tribe to identify Condor roosting areas, nesting areas, and feeding areas. Management would be determined at the implementation-level.
Matsumoto	Kara	26	Conservation Lands Foundation	Alternatives - wildlife	<p>The draft EIS (at 3-124) says that populations of the newly reestablished wolf are stable, although habitat trends are unknown. The wolf is found within the NCIP region in the Klamath Mountains, Eastern Cascades Slopes and Foothills, Cascades, and Sierra Nevada ecoregions. Wolves such as "OR-7" are known to have spent significant time in the Sacramento River Bend Area over the last few years, with multiple visits by wolves documented through the use of tracking devices. The Bend Area is a key connection between the Central Valley and Cascades where the Lassen Pack has been recognized by the CDFW. The Lassen Pack has produced litters each year since 2017. The NCIP planning area once was wolf country and given this reproductive success, is clearly the domain of Canis lupus again.</p> <p>Wolf OR-7 visited the Sacramento River Bend area twice during his wanderings, as shown below from CDFW radio-collar data. See PDF for Gray Wolf ORV Travels Map BLM should consider the positive impacts of healthy predator systems on native grazing ungulate populations that help maintain natural forest and grassland systems. Management measures should be clearly outlined and followed to minimize overlap between wolves and livestock on the landscape through voluntary retirement of any grazing allotments that may present a higher likelihood of wolf-livestock conflicts, including allotments that contain or are in close proximity to known wolf dens or rendezvous sites.</p>	<p>While the NCIP does not directly specify wolf habitat, it does promote the conservation of movement corridors and conserving areas where denning may occur. The NCIP also addresses restoring and conserving ungulate habitat which in turn addresses wolf habitat (Kovacs et al 2016) as wolves occupy various habitats and are primarily dependent upon their prey species (i.e., deer and elk).</p> <p>BLM will protect active gray wolf den and rendezvous sites from human disturbance during the critical breeding period. Site specific details will be used to develop appropriate buffer distances and work periods for individual projects implemented under the RMP.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Fish and Indian Creeks are important contributors of high-quality fresh water to a segment of the main stem Eel River that has been degraded by upstream water diversions. They also contribute to the Eel's outstandingly remarkable anadromous fishery and provide important old growth forest habitat for old forest dependent species. Because the BLM 1995 WSR Inventory identified both creeks as eligible due to the anadromous fishery and wildlife values, both creeks were included in federal legislation in Congress as WSRs.</p> <p>Recommendations: The extended WSR segments should begin at their sources and proceed downstream to their respective confluences with the Eel River. This strategy would comply with Factors 1 and 12 (land ownership and systems approach). The BLM should acquire undeveloped private inholdings from willing sellers to increase connectivity, protect habitat, and improve public and tribal access to the watersheds and the overall English Ridge area.</p>	The BLM recognizes the importance of these creeks to the Eel River, and the identified values will maintain protections through several mechanisms. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The NCIP DEIS finds eligible/suitable 6.9 miles of Hulls Creek due to its fish ORV. Because it is addressed separately both in the report narrative and in the maps, it's likely that the public may not understand that Casoose Creek is an eligible but not suitable tributary of Hulls Creek. At-risk salmonids migrate up Hulls Creek into Casoose Creek and two other Hulls Creek tributaries - Brin Canyon and Horse Canyon Creeks. A true systems approach would find all four streams eligible and suitable. The contribution of these tributaries to the North Fork's degraded fishery and water quality should also be recognized. The Hulls/Casoose/Brin Canyon/Horse Canyon system would benefit greatly from targeted acquisitions of undeveloped private land to fill out the WSR corridors.</p> <p>Recommendations: In addition to Hulls Creek, determine its tributaries - Casoose Creek, Brin Canyon Creek, and Horse Canyon Creek - to be eligible and suitable. Develop a comprehensive plan to acquire undeveloped private land to fill out public ownerships of the WSR corridors.</p>	Hulls Creek tributaries have been added to the "Hulls Creek Complex" as suitable. Table B-1 describes how lands are prioritized for acquisition by the BLM under the Proposed RMP/Final EIS.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>A .4-mile eligible segment of Tenmile Creek was found eligible due to its outstanding anadromous fishery, but the creek was determined unsuitable for designation for the same generic reasons that disqualified other streams. However, no mention is made of the fact that once Tenmile Creek leaves BLM-managed public land, it flows for more than a half mile through the state-owned Angelo Coast Range Reserve.</p> <p>Recommendations: At the minimum, Tenmile Creek from where it enters the BLM land, flows through the Angelo Reserve, to its confluence with the SF Eel should be determined suitable. In addition, an outstandingly remarkable whitewater recreation value should be identified for the creek, which provides a popular class IV kayak run leading boaters into the SF Eel wilderness run. A Google search shows several hits on Tenmile Creek kayaking, proving its statewide significance.</p>	The mention of Angelo Reserve as a neighbor has been added to the Suitability Report. BLM maintains conclusion that the recreation value on the BLM segment does not meet criteria as outstandingly remarkable, and that this segment of Tenmile Creek is not suitable.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>An important tributary to the Sacramento River, Deer Creek possesses outstanding scenery, recreation, fish, and ecological connectivity values. The creek is listed as non-suitable (App. G, pg. 3-61). The .2-mile eligible segment reflects only the portion of the creek flowing on BLM-managed public lands, even though the 1993 inventory documented an 8.1-mile eligible segment for Deer Creek extending from the Lassen National Forest boundary to the Deer Creek diversion dam. We support continued use of the extended 8.1-mile segment. The BLM cites four generic arguments as to why Deer Creek is non-suitable. In rebuttal:</p> <ul style="list-style-type: none"> <li>- Factor 1 - Minimal, fragmented nature of the public lands: Although this accurately reflects the current status of public lands in the Deer Creek corridor, it ignores the fact that Deer Creek flows through the Deer Creek ACEC, with existing and proposed continued management direction to acquire from willing sellers more public lands in the in the extended corridor.</li> <li>- Factor 8 - Surrounding land uses are not consistent: This contention is disputable in regard to Deer Creek. The lands within the extended river corridor are zoned in the Tehama County General Plan for Resource Lands and Upland Agriculture. 11 The Resource Lands designation is intended to protect the natural resource base of Tehama County for its economic, aesthetic, and ecological value. The Upland Agricultural designation is used to preserve lands capable of supporting grazing activities (which is allowed in WSR corridors) and conserve areas of important open space, recreation, scenic, and natural value; and to accommodate non-agricultural uses, including commercial recreation, hunting and fishing, resource protection and management, and habitat management. 12 Not only is this zoning generally consistent with WSR management, the existing direction to acquire more public lands in the ACEC/WSR corridor provides BLM with the necessary tool to address whatever inconsistent land uses may be allowed under this zoning.</li> </ul> <p>11. Figure 2.0-2, Land Use Map, Tehama County General Plan pg. 2.0-27:  12. Tehama County General Plan pgs. 2.0-14, 2.0-21: <a href="https://www.co.tehama.ca.us/wp-content/uploads/2021/12/Tehama-County-General-Plan.pdf">https://www.co.tehama.ca.us/wp-content/uploads/2021/12/Tehama-County-General-Plan.pdf</a></p> <ul style="list-style-type: none"> <li>- Factor 12 - The segment does not provide a critical link to the systems approach: This is absolutely incorrect. The California Essential Habitat Connectivity Project (CalTrans, CDFW, Feb. 2010) shows that Deer Creek flows through a large Natural Landscape Block and its upper and lower segments are considered Essential Connectivity Areas. 13 In addition, the entire creek from its source to its confluence with the Sacramento River is a Potential Riparian Connection. Deer Creek's threatened spring Chinook salmon and winter steelhead seasonally migrate through and hold in pools in the 8.1-mile segment between the National Forest boundary and the Deer Creek diversion dam. The 30 miles of Deer Creek on the Lassen Forest have been determined eligible and suitable for National Wild and Scenic River protection. Although the spawning habitat on the upstream National Forest segments is important to the survival of these threatened species, so is the migration and holding habitat</li> </ul>	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I. Protection of the Deer Creek as an ACEC appropriately addresses these values.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto (cont.)	Kara (cont.)	26 (cont.)	(see above)	(see above)	found in the downstream BLM segment. Whitewater kayakers begin their run on the National Forest and float downstream into the extended BLM segment, emphasizing the connectivity of the system. 13. California Essential Habitat Connectivity Project, CalTrans/CDFW, Feb. 2010, Modoc Plateau Ecoregion Map, pg. B-46, <a href="https://consbio.org/wp-content/uploads/2022/05/CEHC_Plan_MASTER_030210_31_2.pdf">https://consbio.org/wp-content/uploads/2022/05/CEHC_Plan_MASTER_030210_31_2.pdf</a> - Factors 7 & 9 - Federal/state laws currently protect the segment: This is true for Deer Creek and every eligible WSR segment that possess an outstandingly remarkable fish value because they support threatened and endangered fish species. WSR designation and management adds an important layer of land management conservation to this protective strategy. Although state law prohibits any state permits or funding for a water resource project on Deer Creek, this protection does not provide the kind of land management protection associated with federal designation. Factors 7 and 9 should not be used as a rationale to preclude suitability of an eligible segment. Recommendation: Find the 8.1-mile segment of Deer Creek within the Deer Creek ACEC to be eligible and suitable. Acquire undeveloped private lands from willing sellers to improve connectivity, protect habitat, and provide public recreation opportunities within the WSR corridor/ACEC.	(see above)
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	Casoose, Brin Canyon, and Horse Canyon Creeks all flow into Hulls Creek and Hulls Creek flows into the NF Eel River. Hulls Creek is suitable but Casoose, Brin Canyon, and Horse Canyon are not. The NF Eel River was designated to protect its outstanding anadromous fishery. About 16 miles of Hulls Creek is eligible and suitable in the 2023 inventory due to its outstanding anadromous fishery. But its tributaries - Casoose, Brin Canyon, and Horse Canyon Creeks - were found unsuitable. BLM and CDFW surveys found resident rainbow trout and numerous steelhead in Casoose Creek. The extent of anadromy appears to be a 40-foot high waterfall just downstream of the Antone Creek confluence. A CDFW survey of Horse Canyon Creek in 1996 found steelhead downstream of a waterfall located .8 miles upstream of its confluence with Hulls Creek. A CDFW survey of Brin Canyon Creek in 1996 found steelhead and mature rainbow trout in the .5 mile segment of Brin Canyon Creek upstream of its confluence with Horse Canyon Creek. 14 WSR protection of these important Hulls Creek tributaries would increase the protection of the North Fork's anadromous fishery by adding upstream fish habitat and existing sources of high-quality water that ultimately flow into the North Fork. 14. Steelhead/Rainbow Trout ( <i>Oncorhynchus mykiss</i> ) Resources of the Eel River Watershed, California, Gordon S. Becker & Isabelle J. Reining, Center for Ecosystem Management and Restoration, Oakland CA, 2009. Recommendations: The eligible segments of Hulls Creek, Casoose Creek, Brin Canyon, and Horse Canyon should all be suitable. To improve public and BLM understanding of the connectivity of this important contributing system to the NF Eel, the eligible/suitable segments should be shown on one map. The extended WSR corridor for Casoose Creek should begin at the Antone Creek confluence (a waterfall below the Antone Creek confluence marks the extent of anadromy on Casoose Creek). This best meet Factor 12 (systems approach). Future management direction to acquire more public lands in the eligible/suitable river corridor is consistent with Factor 1.	Hulls Creek tributaries have been added to the "Hulls Creek Complex" as suitable.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Five tributaries of the Trinity WSR were determined eligible and suitable, including 2.9 miles of Canyon Creek, 5.4 miles of Indian Creek, 1.5 miles of West Weaver Creek, and .1 mile of an unnamed tributary of West Weaver. Identified ORVs include scenery, recreation, and fish for Canyon Creek; fish and cultural for West Weaver Creek and its unnamed tributary; cultural for Grub Culch; and fish and cultural for Indian Creek. We are perplexed as to why Weaver Creek below the East and West Weaver confluence is not considered eligible and suitable for its fish value - which is the same fish ORV for the upstream segment of West Weaver Creek. A true systems approach would find both West Weaver Creek and lower Weaver Creek eligible/suitable. Visitor and community use of the trail system along West Weaver Creek has increased with the establishment of the Weaverville Community Forest. The system attracts visitors from beyond the region and is becoming more popular not only as a day use destination by tourists, but also for organized events. A recreation ORV should be applied to West Weaver Creek. In addition, there is an opportunity to extend West Weaver Creek's eligibility/suitability upstream into National Forest lands, along with East Weaver Creek. Recommendations: Weaver Creek downstream of the East/West Weaver confluence possesses the same fish ORV as West Weaver Creek - it should be determined eligible and suitable. Because the Weaverville Community Forest trail system attracts visitors from beyond the region and this use is likely to increase in the future, a recreation ORV should be applied to the creek. Both West Weaver/Weaver Creek and Indian Creek would be benefit from extended WSR corridors. Develop a comprehensive plan to acquire undeveloped private land to fill out public ownership of the WSR corridors, improve connectivity and protect habitat.</p>	<p>The Proposed RMP/Final EIS speaks to acquisition criteria in Table B-1, Land Tenure. The criteria include key riparian corridors that improve riparian connectivity and maintain riparian habitat integrity and lands that improve water quantity and water quality. Both criteria could apply to streams whether or not the area is in a WSR corridor.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>NCIP DEIS, Vol. 3, Appendix G, Chapter 3. Suitability Determination: Not Suitable Segments, pgs. 3-1 to 3-161, identifies eligible rivers determined by the BLM to be non-suitable. The reasoning provided as to why these eligible rivers were determined non-suitable generally consists of generic boiler plate language with little difference between individual rivers. The generic nature of these arguments makes it difficult for the public to determine the real reasons for non-suitability decisions. In several specific cases, use of the generic arguments to disqualify eligible segments as non-suitable is inaccurate and not supported by the facts. In summary, the most common generic arguments are:</p> <ul style="list-style-type: none"><li>- Factor 1 (land ownership): The percentage of BLM-managed lands within the corridor is minimal, fragmented, and would not provide adequate access for management of ORVs;</li><li>- Factor 8 (local zoning): The surrounding land uses and management direction is not consistent with management of ORVs</li><li>- Factor 12 (river system approach): When looking at the larger river system, this segment does not provide a critical link to the systems approach, and;</li><li>- Factors 7 &amp; 9 (other federal/state/local protections): There are federal and state laws that currently apply protections to portions of the segment. Non-suitability decisions are a significant issue because once the NCIP EIS is finalized and a Record of Decision released, these eligible but non-suitable segments will lose interim protection of free-flowing character, tentative classification, and outstandingly remarkable values. This is problematic for several streams on the eligible/non-suitable list for reasons indicated below.</li></ul> <p>Recommendations: For some eligible rivers where BLM-managed public lands are indeed minimal and fragmented, we recommend that they remain eligible to allow for future acquisitions of undeveloped private lands from willing sellers that improve WSR protection and management. Eligible streams where current management direction already exists to acquire more public lands should be determined suitable.</p>	<p>Please see the updated Suitability Report that contains additional information for several streams' suitability determinations. This Plan follows BLM Wild and Scenic River Manual 6400, which references as policy guidance the Interagency Wild and Scenic River Study Process document that states "Agency-identified study river protection continues unless a river is determined not suitable for designation. For non-suitable Section 5(d)(1) rivers, protection of river values reverts to the direction provided in the underlying land use plans for the area." The outstandingly remarkable values on eligible segments that are determined to be non-suitable would be protected through other means, such as those provided in the Plan (e.g., ACEC, Riparian Management Areas, Water Quality), as well as regulatory mechanisms such as the Endangered Species Act and Clean Water Act.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Previous WSR inventories conducted in 1993 (Redding RMP) and 1995 (Arcata RMP) identified WSR corridors that extended beyond just the short segments where the stream flows on public lands managed by the BLM. This was necessary given the scattered nature of BLM-managed public lands in north central and northwest California. Otherwise, many eligible streams in the NCIP region would be considered non-suitable due to the difficulty of managing and protecting river values on short segments limited to just public lands (see Eligible/Non-Suitable Rivers section below for further discussion).</p> <p>The 2018 and 2023 WSR inventories largely focus on the eligibility of just the public land segments, rather than an extended corridor that more logically can be managed to protect river values. Consequently, the 2018 and 2023 inventories include more eligible segments but less eligible miles than the 1993/1995 inventories. In response to our inquiry about this issue, the BLM indicated that the agency intended to use extended corridors but didn't have the time to reconcile the mileage numbers in the DEIS. The suitable river tables should show both the eligible miles on BLM-managed public lands and the overall miles of the extended corridor, but in many cases, the mileage numbers don't reflect extended corridors.<sup>10</sup> The individual suitability maps in Appendix G should also be updated to show the extended corridors.</p> <p><sup>10</sup> Email discussion with Zane Ruddy, Arcata BLM, Oct. 3, 5, 17, and 18, 2023.</p> <p>Extended eligible river corridors longer than just the BLM segments are specified in the suitability tables only for Bear Creek, Big Chico Creek, Clear Creek, Hulls Creek, Indian Creek (Trinity River tributary) and the Mattole River. We believe that all suitable rivers listed in the inventory would benefit from the establishment of extended river corridors that go beyond the smaller discreet segments on public lands, particularly where existing BLM management direction is to acquire more public lands from willing sellers in the river corridors.</p> <p>Recommendations: Wherever feasible, use logically extended WSR corridors to fully protect the free-flowing character and outstanding values of suitable rivers. Acquire undeveloped private land from willing sellers to increase connectivity, protect habitat, and provide for public recreation access. Update the suitability maps in Appendix G to depict extended corridors.</p>	The BLM has extended the corridors where we believe it makes sense to do so. The Suitability Report has been updated to ensure all mileages are accurate.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Sevenmile Creek is the only Sacramento River tributary in the Sacramento River Bend Area to be determined eligible but not suitable. About 1.3 miles of the creek and 5.8 miles of its tributaries are eligible due to outstandingly remarkable cultural and ecological values. But the BLM uses the same four generic factors to discount its suitability. The BLM claims that Sevenmile and its tributaries do not contribute to the larger river system, and yet all other tributaries and 15 miles of the Sacramento River are suitable. Unless the BLM is to acquire the intervening private property, we agree that including the very upper segment of Sevenmile Creek and its tributaries in section 20, T28N, R2W east of Highway 36 may not be suitable. However, lower Sevenmile Creek and its tributaries are located within or directly adjacent to the Sacramento River Bend ACEC and possess cultural and ecological values that contribute to the unique nature of the overall area and its suitable rivers. To optimize this strategy, section 35 between the ACEC boundary and Sevenmile Creek's confluence with the Sacramento River should be acquired on a willing seller basis.</p>	The suitability determination for Sevenmile Creek and tributaries has been updated in the Proposed RMP/Final EIS and Wild and Scenic Rivers Suitability Report.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Several tributaries of the South Fork Eel WSR were found eligible but not all were determined suitable. Suitable rivers include 6.3 miles of Cedar Creek and its tributaries and 3.9 miles Elder Creek and its tributaries. Eligible but not suitable rivers include 1.2 miles of the East Branch South Fork Eel and two of its tributaries - .1 mile of Elkhorn Creek and .3 miles of Cruso Cabin Creek, and .4 miles of Tenmile Creek.</p> <p>A systems approach would assess the East Branch and Elkhorn and Cruso Cabin Creeks as one system and display on one map. Although we agree that the East Branch "is an important producer of federally-listed Threatened steelhead trout" the NCIP description fails to recognize that the East Branch provides cool water into the degraded South Fork. A field trip to the East Branch in August during the fifth year of drought found the stream to be flowing well and maintaining suitable temperatures for salmonids. BLM management should focus on maintaining this attribute. Because of their importance to the SF Eel fishery, segments of the East Branch, Elkhorn Creek, and Cruso Cabin Creek are proposed WSRs in legislation currently pending in Congress (along with Cedar Creek and Elder Creek).</p> <p>Tenmile Creek flows out of public land managed by the BLM into state land managed as part of the Angelo Coast Range Preserve. A true systems approach would include all of these South Fork tributaries as suitable. Lower Elder Creek is also located in the state-owned Angelo Coast Range Reserve. The eligible/suitable segments of Cedar Creek and its tributaries end at the public lands boundary - about three miles of creek flows unprotected through private lands to its South Fork confluence</p> <p>Recommendations: Follow a systems approach and find all South Fork tributaries - Elder Creek, Tenmile Creek, Cedar Creek, East Branch South Fork Eel, Elkhorn Creek, and Cruso Cabin Creek to be suitable. Develop/implement a comprehensive acquisition plan for undeveloped private lands to increase public ownership in the WSR corridors, improve connectivity, protect habitat, and enhance public recreation access, particularly for lower Cedar Creek and the East Branch.</p>	<p>The BLM recognizes the regional importance of the segments but has concluded the systems approach of including many small segments within a large basin as one unit is not appropriate. The description of cool stream temperatures is not consistent with the water temperature data available for the lower East Branch SF Eel, which indicates temperatures exceeding the thermal tolerances of cold-water fish in many locations.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The .2-mile eligible segment of Mill Creek is located downstream of a 32-mile segment of the creek on the Lassen National Forest determined eligible and suitable for WSR protection. Astoundingly, this short BLM segment is packed with outstandingly remarkable scenery, fish, wildlife, geology, and cultural values. The eligible segment is also adjacent to the Dye Creek Preserve, which is owned by the state and managed by The Nature Conservancy, which has a long-term land conservation strategy for the Lassen Foothills.</p> <p>Recommendations: At the minimum, the .2-mile segment of Mill Creek should remain eligible and the BLM should continue to provide interim protection. The BLM should work cooperatively with The Nature Conservancy to develop a comprehensive plan to acquire undeveloped private land from willing sellers in the lower foothills segment of the creek to increase connectivity, protect habitat, and provide public recreation opportunities.</p>	<p>The BLM recognizes the regional importance of the segment, but for the reasons explained in the Suitability Report we have found it to be not suitable, and the Plan does not provide interim protections for non-suitable segments.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The EBSF Eel and its tributaries are important high quality water contributors to the SF Eel and its anadromous fisheries. Segments of the EBSF Eel and its tributaries - Cruso Cabin, Elkhorn, and the School Section Creek complex - should be considered together per Factor 12 (systems approach). Public ownership along this crucial tributary of the SF Eel is fragmented, but the stream is fed high quality water from the serpentine soils on the east side of Red Mountain. This water flows downstream to maintain water quality and fish habitat in the SF Eel. Because of their contribution to the SF Eel fishery, the EBSF Eel and its tributaries were included in federal legislation as a WSR.</p> <p>Recommendations: The eligible/suitable extended segments should begin at the sources of Cruso Cabin, Elkhorn, and School Section Creeks to their confluence with the EBSF Eel and include the EBSF Eel downstream to at least the Little Butte Ecological Reserve. BLM management direction should focus on acquisition from willing sellers of undeveloped private lands in the WSR corridors and surrounding areas to improve connectivity and protect habitat. This suitability strategy would be in full compliance with Factors 1 and 12 (land ownership and systems approach).</p>	The BLM recognizes the regional importance of the segments, but has concluded the systems approach of including many small, scattered segments within a large basin as one unit is not appropriate. Much of the area is protected as a wilderness and existing regulations will meaningfully protect these values.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The Mattole River is one of the few eligible streams where an extended eligible river corridor identified in the 2023 inventory. Of the 14.7-mile extended eligible corridor, about 2.7 miles flow through BLM-managed public lands. In addition, several Mattole tributaries were determined eligible including 2 miles of Sholes Creek, 4.2 miles of Fourmile Creek and its North Fork, 1.5 miles of Grindstone Creek, and .2 miles of Eubank Creek. All of the eligible segments possess outstandingly remarkable anadromous fish value.</p> <p>Recommendations: Because of statewide interest in conserving the Mattole River watershed, the BLM at the minimum should retain eligibility of the Mattole segments and its tributaries to maintain interim protection of the fish values. The BLM should work closely with Mattole watershed groups to develop a comprehensive plan to acquire undeveloped private lands from willing sellers to increase connectivity, protect habitat, and improve public and tribal access to the river.</p>	The BLM recognizes the regional importance of the Mattole River and its tributaries as mentioned in the Gilham Butte ACEC and Upper Mattole ACEC Table B-1. Additionally, the BLM has determined current federal and state laws provide protection to this area and protect the ORVs.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The NCIP DEIS finds eligible and suitable 7.6 miles of Lacks Creek due to its scenery, fish, and ecology ORVs. In addition, 3.6 miles of Lacks Creek tributaries are eligible/suitable due to their scenery and ecology values. Lacks Creek would benefit from extended its eligible/suitable corridor downstream to the creek's confluence with Redwood Creek.</p> <p>Recommendations: Extend the eligible/suitable corridor for Lacks Creek down to its confluence with Redwood Creek. - North Fork Eel River Tributaries</p>	The corridor includes the private segment downstream of the BLM boundary. See Lacks Creek Map in Suitability Report.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>The NCIP DEIS finds suitable and recommends 2.1 miles of the NF Cottonwood Creek, 4.6 miles of the MF Cottonwood Creek (segs. A, B), 4.7 miles of Beegum Creek (a tributary of the MF Cottonwood Creek), and 3.1 miles of the SF Cottonwood Creek (segs. A, B). The suitable segments possess scenery, recreation, fish, and geology ORVs. The suitability recommendations are appropriate given the fact that Cottonwood Creek is one of the largest undammed tributaries to the Sacramento River. There is also an opportunity to extend WSR protection upstream on the MF and SF Cottonwood Creek and Beegum Creek into National Forest lands.</p> <p>Recommendations: We support the suitability findings for the NF, MF, and SF Cottonwood Creek and Beegum Creek. Extended corridors should be established, particularly for the SF Cottonwood Creek, which should extend from the Yolla Bolly-Middle Eel Wilderness boundary to the South Fork's confluence with Brush Creek. The final NCIP should prioritize acquisition of undeveloped private land from willing sellers to increase public ownership of the suitable WSR corridor, improve connectivity, protect habitat, and enhance public recreation.</p>	Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	The NCIP DEIS finds suitable and recommends 4.5 miles of Butte Creek and .8 miles of the West Branch Butte Creek due to their outstandingly remarkable scenery, recreation, fish, history, and geology values. Recommendations: We support the suitability recommendation for Butte Creek with some changes. We recommend that an ecology ORV be applied to Butte Creek because it flows through a large Essential Connectivity Area identified by the California Habitat Connectivity Project. An extended corridor should be suitable, starting from the eastern boundary of the Forks of Butte ACEC and extending downstream to the BLM-managed public lands near Centerville in section 8, T22N, R3E. The final NCIP should prioritize acquisition of undeveloped private land from willing sellers to complete public ownership of the suitable WSR corridor and the existing ACEC, improve connectivity, protect habitat, and enhance public recreation.	Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths. The BLM has considered your recommendation about adding an ecology ORV and we do not feel it is appropriate in this case. While Butte Creek is an important ecological area, the area does not meet the standard of being so unique, rare, or exemplary as to make them outstandingly remarkable. Acquisition criteria found in Table B-1, Land Tenure include criteria to prioritize WSR suitable corridors and other stream areas regardless of whether it is in a WSR or not.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	The Revised WSR Eligibility Report (2023) Table 2-3, pgs. 2-15 to 2-17, displays a list of inventoried rivers determined ineligible. There is no narrative with this table that delineates the segments inventoried or that provides specific reasons why the BLM believes the segments to be ineligible. The table includes some river segments as "ineligible" that are already in the National Wild and Scenic Rivers System, including .4 miles of the NF Trinity River; 2.2 miles of the NF Eel River; and 2.4 miles of the SF Eel River. Recommendations: The existing designated segments should be removed from the ineligibility table. Some narrative should be included in the final inventory for the remaining ineligible rivers that delineates the specific segments and explains the rationale for the ineligibility determinations.	The Eligibility Report is final and not open for edits. The segments listed were mistakes and being on the list does not change management.
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	We support the suitability findings for 5.5 miles of the Shasta River (segs. A-B), of which, 3.4 miles flow through BLM-managed public lands. The suitable segments possess scenery, recreation, fish, and cultural ORVs. We recommend that an ecology ORV should also be applied because the eligible/suitable segments of the river are located in a Large Natural Landscape Block anchored to the east and west with Essential Connectivity Areas identified in the California Essential Habitat Connectivity Project. Recommendations: Retain the suitability findings for all 5.5 miles of the Shasta River and add an ecology ORV. The final NCIP should prioritize acquisition of undeveloped private land from willing sellers to increase public ownership of the suitable WSR corridor; improve connectivity, protect habitat, and enhance public recreation. Develop a comprehensive plan to acquire undeveloped private land to fill out public ownerships of the WSR corridors.	The BLM has considered your recommendation about adding an ecology ORV and we do not feel it is appropriate in this case. Acquisition criteria found in Table B-1, Land Tenure section include criteria to prioritize WSR suitable corridors and other stream areas regardless of whether it is in a WSR or not.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Appendix G: Draft Wild and Scenic River Suitability Report	<p>Will the BLM forego the opportunity to help protect the Grand Canyon of the Mad River? Of the 30-mile segment of the river between Highway 36 and Jack Shaw Road (which includes the segment that expert whitewater kayakers consider to be the "Grand Canyon" of the Mad River), only about .9 miles of the Mad River in four disjunct segments were determined eligible due to the river's outstanding anadromous fishery. We strongly believe that this segment of the Mad River also possesses an outstandingly remarkable whitewater value. According to kayaker and Dan Menten, author of The New School Guide to Northern California Whitewater:</p> <p>The Grand Canyon of the Mad escaped the kayak radar for years because it was beyond the limits of whitewater that longer boats could navigate. With changes in design, skills, and the mentality of class V kayakers, the Grand Canyon of the Mad now makes for expedition-style whitewater kayaking in California and belongs at the top of any experienced boater's list... The Mad River enters the beautiful "Grand Canyon" section. The walls rise enormously and class IV rapids are fairly continuous until you reach the end of the gorge. (pgs. 177-178)</p> <p>BLM-managed public lands on the Mad River are minimal and fragmented. But simply finding the river to be non-suitable eliminates the interim protection provided by eligibility/suitability and ignores creative solutions that could permanently protect the river.</p> <p>Recommendations: Outstanding whitewater recreation should be added as an ORV. The 30-mile segment of the Mad River should at the minimum remain eligible and that the BLM should participate in a cooperative effort with the Baduwa't Watershed Council (formerly the Mad River Alliance), the Wiyot Tribe, and with anglers and boaters to develop a comprehensive plan to acquire undeveloped private lands from willing sellers to increase connectivity, protect habitat, and improve public and tribal access to the river.</p>	<p>We recognize the recreation ORV and have added it to the Suitability Report. However, we maintain the conclusion that these reaches are not suitable for inclusion, and BLM is not able to manage the 30-miles referenced in the comment.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Best available science and information	<p>Finally, BLM Instruction Memorandum 2013-094 regards management during drought. This IM requires the BLM to modify uses and management to lessen impacts from drought including activities such as grazing, recreation, lands actions and minerals activities. IM 2013-094 also states that the BLM should consider the information in the BLM's Rapid Ecoregional Assessments, when available, for assessing drought and mitigation measures and states a preference for RMPs and other plans to proactively address potential drought and its effects.</p>	<p>The BLM Instruction Memorandum 2013-094 expired in 2014. More information on how livestock grazing would be managed can be found in the Proposed RMP/Final EIS in Table B-I and in relevant BMPs in Appendix F.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Best available science and information	<p>Impacts to the ecosystem from climate change include shrinking water resources; extreme flooding events; invasion of more combustible non-native plant species; soil erosion; loss of wildlife habitat; and larger, hotter wildfires. Many of these impacts have been cataloged in recent studies by federal agencies showing the impacts of climate change specifically in the United States such as the National Climate Assessment (see National Climate Assessment).</p> <p>Secretarial Order (S.O.) No. 3289 unequivocally mandates all agencies within the Department of Interior "analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." S.O. 3289, incorporating S.O. 3226. This plan falls squarely under this guidance, and we thank the BLM for assessing in detail the impacts from the proposed actions under each alternative that may directly, indirectly, or cumulatively result in exacerbating climate change.</p>	<p>Comment noted and appreciated.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Consistency with other plans, laws, and regulations	BLM must also consider the various planning efforts across the state and country that will have broader implications for the planning area, including the Western Solar Plan Programmatic EIS and the West-Wide Energy Corridor Review.	Ongoing energy development-related actions are currently addressed in the RMP/EIS. The Cumulative Impacts discussion under Section D.3.4, for example, specifically describes that the Energy Act of 2020 mandates the DOI to authorize a total of at least 25 gigawatts of electricity production from wind, solar, and geothermal energy projects on federal lands by 2025. In 2022, the BLM stated its intent to prepare an updated PEIS for solar energy development in western states, including California, by June 2024. This PEIS will update and build upon the BLM's 2012 Solar PEIS and Record of Decision (ROD) in response to Executive Order 14008 and the Energy Act of 2020. The 2024 Western Solar PEIS may require amendments to existing RMPs and may also result in updated mapping or modeling for solar potential and developable acreage for solar projects within the planning area and throughout California and neighboring states.
Matsumoto	Kara	26	Conservation Lands Foundation	Consistency with other plans, laws, and regulations	BLM is engaged in several proposed rulemaking processes that should work as a package to support planning decisions within the AFO and RFO. BLM's Proposed Conservation and Landscape Health Rule, Proposed Rule on Fluid Mineral Leases and Leasing Process, and Proposed Renewable Energy Rule all present a unique opportunity for the agency to ensure land use planning decisions ladder up to and support national policy goals.	The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. Management common to all action alternatives includes consistency with existing Executive Orders, Secretarial Orders, laws, and regulatory requirements. Alternative B emphasizes habitat connectivity and resilience while allowing appropriate development scenarios for resource uses (such as recreation, ROWs, livestock grazing, and mineral leasing).
Matsumoto	Kara	26	Conservation Lands Foundation	Consistency with other plans, laws, and regulations	<p>On January 27, 2021, President Biden signed Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, which laid out a policy goal of protecting at least 30% of our nation's lands and waters by 2030. This goal is what scientists have determined we need to combat the biodiversity and climate crises and sustain the human population worldwide. The success of this 30x30 initiative will hinge on the nation's largest land manager, the BLM. BLM should use this planning process as an opportunity to uphold the principles of 30x30 by establishing protections throughout the NCIP planning area, including designating Wilderness Study Areas (WSAs) and ACECs. In addition to committing to the 30x30 goal in Executive Order 14008, President Biden strengthened his administration's dedication to meaningful conservation through the recommendations set forth in the 2021 America the Beautiful report.<sup>2</sup> This report provides guidance and principles for pursuing locally led efforts to conserve and restore "America the Beautiful." The eight principles are:</p> <p>1. <a href="https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/">https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/</a></p> <p>2. <a href="https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf">https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf</a></p> <p>Principle 1: Pursue a Collaborative and Inclusive Approach to Conservation</p> <p>Principle 2: Conserve America's Lands and Waters for the Benefit of All People</p> <p>Principle 3: Support Locally Led and Locally Designed Conservation Efforts</p> <p>Principle 4: Honor Tribal Sovereignty and Support the Priorities of Tribal Nations</p> <p>Principle 5: Pursue Conservation and Restoration Approaches that Create Jobs and Support Healthy Communities</p> <p>Principle 6: Honor Private Property Rights and Support the Voluntary Stewardship Efforts of Private Landowners and Fishers</p> <p>Principle 7: Use Science as a Guide</p> <p>Principle 8: Build on Existing Tools and Strategies with an Emphasis on Flexibility and</p>	<p>The America the Beautiful Initiative and the California 30x30 initiative (see Section 1.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider "conserved." Table 1-2 in Chapter 1 of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table 1-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Consistency with other plans, laws, and regulations	We applaud the DEIS' recognition of both California and federal 30x30 efforts, and we urge the BLM to keep both in mind when finalizing the NCIP RMP.	<p>The America the Beautiful Initiative and the California 30x30 initiative (see Section 1.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider “conserved.” Table 1-2 in Chapter 1 of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table 1-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	Consistency with other plans, laws, and regulations	<p>We support the BLM recognizing and implementing California state 30x30 policies into the NCIP, and we urge BLM to continue cooperating with the CNRA to achieve 30x30 goals through the NCIP planning process. California's "Pathway to 30x30" report explicitly mentions federal efforts, such as NCIP. California defines conservation areas as "[l]and and coastal water areas that are durably protected and managed to support functional ecosystems, both intact and restored, and the species that rely on them."3 Such protections can be designated through the NCIP planning process, including wild and scenic river (WSR) and WSA designations. We urge the BLM to establish such protections through NCIP, in order to further the state's 30x30 goals.</p> <p>3. Pathways to 30x30 California</p>	<p>The America the Beautiful Initiative and the California 30x30 initiative (see Section 1.4.1) are both initiatives that focus on conserving lands and waters across the nation and state, respectively. While the California 30x30 initiative has developed a definition for a Conservation Area, the America the Beautiful Initiative does not currently have a published definition of what to consider “conserved.” Table 1-2 in Chapter 1 of the RMP/EIS identifies the BLM-administered land by alternative that the BLM determined would contribute to both initiatives.</p> <p>Under all alternatives, disposal of BLM-administered lands that are currently considered to contribute to the America the Beautiful Initiative (Table 1-2) could potentially result in reduced protection of those areas. Alternative A proposes the greatest acreage of land potentially suitable for disposal, followed by Alternative C. Alternatives B and D would therefore be the most consistent with the America the Beautiful Initiative. However, as discussed under Impacts Common to All Alternatives, the BLM would not dispose of conservation lands unless they could be transferred to another federal agency.</p> <p>The BLM would consider disposing of lands containing sensitive resources to nonfederal agencies or nonprofit organizations (for example, county and state agencies or conservation organizations) only if the protection and conservation that would be afforded the parcel following transfer of title would equal or exceed the level afforded by BLM ownership. Therefore, all alternatives would result in an incremental beneficial impact on conservation and recreation lands that would support both conservation initiatives. Alternatives B and D would result in the greatest beneficial contribution toward conservation.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Consultation and Coordination	Perhaps we can even in the near-term make heroism in wilderness stewardship less necessary for AFO and RFO staff as a result of alternative D. We hope to collaborate with AFO and RFO on that further as part of implementing the ROD. We will continue in our efforts to win the AFO and RFO all of the sustainable funding it needs and deserves to steward these units of the NWPS and its portion of the Ishi Wilderness that the RFO manages with the Lassen NF.	Thank you for your comment. The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. NEPA and the associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process. The BLM is open to opportunities to collaborate with partners and will continue to meet with interested agencies and organizations throughout the planning process, as appropriate.
Matsumoto	Kara	26	Conservation Lands Foundation	FLPMA - Multiple Use	None of the overarching legal mandates under which BLM operates, be it multiple use or non-impairment, authorizes BLM to establish energy development as the dominant use of public lands. Thus, any action that attempts to enshrine energy development as the dominant use of public lands is invalid on its face and inconsistent with the foundational statutes that govern the management of public lands. BLM has authority to close areas to oil and gas leasing in order to prioritize other important resources and values. The U.S. Court of Appeals for the 10th Circuit has reiterated: "It is past doubt that the principle of multiple use does not require BLM to prioritize development over other uses. Development is a possible use, which BLM must weigh against other possible uses including conservation to protect environmental values. . . ." (New Mexico ex rel. Richardson v. BLM, 565 F.3d 683, 710 (10th Cir. 2009)). BLM recognizes that oil and gas leasing can be inconsistent with protecting other important resources and values. BLM must prioritize protection of natural resource values where they exist, and adhere to the agency's multiple use and sustained yield mandate in developing the plan.	<p>The purpose of the NCIP is to make land use decisions to guide the management of BLM-administered lands within the planning area. Planning decisions would integrate current law and policies, as well as current information, to resolve primary issues identified in the planning area, specifically related to increasing human population and changing use patterns, wilderness management, climate change, special status species, and land tenure.</p> <p>The BLM manages public lands for multiple uses and sustained yield in accordance with FLPMA. The BLM makes land use decisions to protect the resources while allowing for different uses of those resources, such as energy and mineral development, timber harvest, recreation, and livestock grazing. When there are conflicts among resource uses or when a land use activity could result in unacceptable or irreversible impacts on the environment, the BLM may restrict or prohibit some land uses in specific areas. To ensure the BLM meets its multiple-use and sustained yield mandate in land management actions, the alternatives' impacts on resource uses are identified and assessed as part of the planning process. The projected impacts on land use activities and the environmental impacts of land uses are characterized and evaluated for each alternative.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	FLPMA - Multiple Use	The Federal Land Policy and Management Act (FLPMA) obligates BLM to abide by the principles of multiple use and sustained yield. The definition of multiple use makes clear that BLM is obligated to manage our public lands for a number of resources other than oil and gas leasing, including recreation, watershed health, wildlife and fish, and natural scenic, scientific, and historical values. BLM is directed to not always prioritize economic return. In other words, simply because a particular resource exists does not mean that BLM should or must allow extraction of that resource. Outdoor recreation, fish and wildlife, and grazing are all "principal" uses of public lands and must receive the same consideration as energy development.	<p>The purpose of the NCIP is to make land use decisions to guide the management of BLM-administered lands within the planning area. Planning decisions would integrate current law and policies, as well as current information, to resolve primary issues identified in the planning area, specifically related to increasing human population and changing use patterns, wilderness management, climate change, special status species, and land tenure.</p> <p>The BLM manages public lands for multiple uses and sustained yield in accordance with FLPMA. The BLM makes land use decisions to protect the resources while allowing for different uses of those resources, such as energy and mineral development, timber harvest, recreation, and livestock grazing. When there are conflicts among resource uses or when a land use activity could result in unacceptable or irreversible impacts on the environment, the BLM may restrict or prohibit some land uses in specific areas. To ensure the BLM meets its multiple-use and sustained yield mandate in land management actions, the alternatives' impacts on resource uses are identified and assessed as part of the planning process. The projected impacts on land use activities and the environmental impacts of land uses are characterized and evaluated for each alternative.</p>
Matsumoto	Kara	26	Conservation Lands Foundation	GIS maps/data	Map 1-2 Suitable Rivers requires some corrections/additions. Beegum Creek is missing from the map, as are some tributaries in the Sacramento River Bend Area, including Turtle Creek, Inks Creek and tributary, Massacre Creek, and the two unnamed Sacramento River tributaries. In addition, Grub Creek, a West Weaver Creek tributary, is also missing from the map.	Maps of eligible and suitable river segments have been updated in Appendix A and Appendix I.
Matsumoto	Kara	26	Conservation Lands Foundation	GIS maps/data	The improved individual WSR eligible/suitable maps in the 2023 eligibility report are quite useful and we thank the BLM for providing them. However, these maps should be adjusted to show the extended WSR corridors displayed in Map 1-2 Suitable Rivers, DEIS Appendix G (see comment above).	The RMP addresses lands administered by the BLM only. Total segment length of suitable river or stream segments is included in the text to show the ecological connectivity between stream segments and not applicability of management actions. Maps of eligible and suitable river segments have been updated in Appendix A and Appendix I.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	GIS maps/data	Map 2-50 Alternative D:Wild and Scenic Rivers is different than Map 1-2 Suitable Rivers, DEIS Appendix G.The former shows just the eligible/suitable segments on BLM-managed public lands while the latter depicts the logically extended WSR corridors for eligible/suitable rivers. In response to our inquire, we were informed that Map 1-2 Suitable Rivers from Appendix G is the most accurate map. Map 2-50 should be updated to reflect this.	Map entitled "Alternative D: Wild and Scenic Rivers" depicts all suitable river segments that are on BLM-managed lands.The plan and EIS (including the maps) only depict management for BLM-managed lands; BLM can only make decisions about BLM-managed lands.The Suitability report (and associated maps) try to look at river systems more holistically and thus are considering the non-BLM-managed lands in the segment corridors.This report is a communication tool for land managers, law makers, and others, rather than a decision document that must focus on where BLM has jurisdiction.
Matsumoto	Kara	26	Conservation Lands Foundation	Monitoring	The proposed plan should establish intervals and standards, as appropriate, for monitoring and evaluation of the plan. Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or whether there is new data of significance to the plan. BLM should designate a field manager to be responsible for monitoring and evaluating the plan in accordance with the established intervals and standards and at other times as appropriate to determine whether there is sufficient cause to warrant amendment or revision of the plan. See 43 C.F.R. § 1610.4-9I. Such vigilant monitoring is crucial in order to create an effective adaptive management framework in the face of climate change.	As described in the Proposed RMP/Final EIS, the BLM would adhere to the guidelines outlined in 43 CFR §1610.4-9 regarding monitoring and evaluation.The intervals and standards for assessing the approved RMP would be established in alignment with the sensitivity of the resources affected by the decisions made following the signing of the NCIP Record of Decision.These intervals and standards would facilitate ongoing evaluation to ascertain the effectiveness of management actions, detect any significant changes in related plans of other federal, state, or local agencies, or Tribes, and consider new data of significance to the plan.The BLM would provide for the monitoring and evaluation of the plan, following the established intervals to meet current BLM policy and best available methods and science to determine changes needed. Additionally, assessments would be conducted at other appropriate times to determine whether there is sufficient cause to warrant an amendment or revision of the plan, as specified in the regulations.
Matsumoto	Kara	26	Conservation Lands Foundation	Monitoring	We support the publication of a Monitoring Plan with the final EIS, and we welcome the opportunity to provide input on how monitoring can and should be conducted within the planning area, particularly with respect to climate change. General statements that the BLM will conduct monitoring are not a sufficient form of climate impact mitigation. Simply monitoring for expected damage does not reduce or alleviate any actual impacts. Instead, a vigilant science-based monitoring system should be detailed in the forthcoming Monitoring Plan, in order to address unforeseeable shifts to the ecosystem.A detailed monitoring approach is also required under the BLM's planning regulations.	As described in the Proposed RMP/Final EIS, the BLM would adhere to the guidelines outlined in 43 CFR §1610.4-9 regarding monitoring and evaluation.The intervals and standards for assessing the approved RMP would be established in alignment with the sensitivity of the resources affected by the decisions made following the signing of the NCIP Record of Decision.These intervals and standards would facilitate ongoing evaluation to ascertain the effectiveness of management actions, detect any significant changes in related plans of other federal, state, or local agencies, or Tribes, and consider new data of significance to the plan.The BLM would provide for the monitoring and evaluation of the plan, following the established intervals to meet current BLM policy and best available methods and science to determine changes needed.Additionally, assessments would be conducted at other appropriate times to determine whether there is sufficient cause to warrant and amendment or revision of the plan, as specified in the regulations. Additionally, the BLM conducts a number of ongoing monitoring protocols across different resource areas which can be used to conduct meaningful analyses of a changing climate. Forest inventories, datasets of vegetation distributions, and robust wildlife monitoring across of a range of species are all baseline datasets from which the impacts of climate changes and management decisions can be evaluated. BLM will continue to work with partner agencies specializing in the collection of climate data including temperature, wind patterns, and hydrology as well as researchers focused on the impacts of climate change on flora and fauna across the planning area to continue using adaptive management to protect resources.The BLM is open to opportunities to collaborate with partners and will continue to meet with interested agencies and organizations throughout the planning process, as appropriate.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto	Kara	26	Conservation Lands Foundation	Other Laws	Representative Jared Huffman's Northwest California Wilderness, Recreation, and Working Forests Act (HR 3700), which is one of three measures included in Senator Alex Padilla Protecting Unique and Beautiful Landscapes by Investing in California (PUBLIC) Lands Act (S. 1776), has passed the House twice and is slated to be "marked-up" by the Senate Energy and Natural Resources Committee on December 14th of this year. Please note that S. 1776 and HR 3700 propose to add the Big Butte WSA to the adjacent Yolla Bolly-Middle Eel Wilderness and all but roughly 200 acres of the Eden Valley WSA to the adjacent Yuki Wilderness. The bill also proposes to release the roughly 200 acres of the Eden Valley WSA that would not be designated as a component of the NWPS because it has been impacted by roads used to access adjacent private land on the Eden Valley Ranch.	Thank you for your comment. The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. The BLM would also manage BLM-administered lands in accordance with such bills, when executed. Decisions regarding land acquisition and land tenure can be found in Section D.3.2 or Table B-1. For information about how future land withdrawals and acquisitions would be managed, refer to the Lands and Realty – Land Tenure section in the RMP/EIS.
Matsumoto	Kara	26	Conservation Lands Foundation	Other Laws	Sec. 1274(d)(2) of the NWSRA requires a conformity review of river corridors, segment classifications, and management plans for rivers designated before January 1, 1986 - this applies to the 2(a)(ii) segments managed by the BLM in the NCIP region. We can find no mention of this requirement in the NCIP DEIS. The final plan should include the conformity review required by law. Even though it wasn't required by law, the BLM published a South Fork Eel River Draft Management Plan/EIS in 1990 and a supplemental draft in 1993. It is unclear as to whether this plan was ever finalized, but it should also be reviewed and updated if needed.	Reviews under WSRA Section 3(d)(2) are not required for WSR designated rivers under WSRA Section 2(a)(ii). Under the Proposed RMP/Final EIS the BLM is not requiring the writing of a CRMP for the 2(a)(ii) designated rivers, however, nothing precludes the BLM from doing so in the future if the opportunity arises. While no federal river plans are required for these state-administered, federally designated rivers, the BLM could make a future decision to develop a step-down plan for one or more of these rivers. The NCIP contains direction to protect and enhance the values of 2(a)(ii) WSR in the planning area.
Matsumoto	Kara	26	Conservation Lands Foundation	Vegetation	1B and 2B taxa with documented CNDDDB occurrences on BLM land not included in the EIS Scientific Name: Cardamine pachystigma var. dissectifolia Common Name: dissected-leaved toothwort Federal State: [blank] CRPR: 1B.2 Scientific Name: Carex lyngbyei Common Name: Lyngbye's sedge Federal State: [blank] CRPR: 2B.2 Scientific Name: Castilleja litoralis Common Name: Oregon coast paintbrush Federal State: [blank] CRPR: 2B.2 Scientific Name: Downingia pusilla Common Name: dwarf downingia Federal State: [blank] CRPR: 2B.2 Scientific Name: Downingia willamettensis Common Name: Cascade downingia Federal State: [blank] CRPR: 2B.2 Scientific Name: Erigeron bloomeri var. nudatus Common Name: Waldo daisy Federal State: [blank] CRPR: 2B.3 Scientific Name: Erysimum concinnum Common Name: bluff wallflower Federal State: [blank] CRPR: 1B.2 Scientific Name: Erythronium hendersonii Common Name: Henderson's fawn lily Federal State: [blank] CRPR: 2B.3 Scientific Name: Erythronium oregonum Common Name: giant fawn lily Federal State: [blank] CRPR: 2B.2 Scientific Name: Erythronium revolutum Common Name: coast fawn lily Federal State: [blank] CRPR: 2B.2 Scientific Name: Frasera albicaulis var. modocensis Common Name: Modoc green-gentian Federal State: [blank] CRPR: 2B.3 Scientific Name: Fritillaria gentneri Common Name: Gentner's fritillary Federal State: [blank] CRPR: 1B.1 Scientific Name: Hymenoxys lemmonii Common Name: alkali hymenoxys Federal State: [blank] CRPR: 2B.2 Scientific Name: Juncus dudleyi Common Name: Dudley's rush Federal State: [blank] CRPR: 2B.3 Scientific Name: Lomatium peckianum Common Name: Peck's lomatium Federal State: [blank] CRPR: 2B.2 Scientific Name: Microseris laciniata ssp. detlingii Common Name: Detling's silverpuffs Federal State: [blank] CRPR: 2B.2 Scientific Name: Moneses uniflora Common Name: woodnymph Federal State: [blank] CRPR: 2B.2 Scientific Name: Monotropa uniflora Common Name: ghost-pipe Federal State: [blank] CRPR: 2B.2 Scientific Name: Montia howellii Common Name: Howell's montia Federal State: [blank] CRPR: 2B.2 Scientific Name: Polemonium carneum Common Name: Oregon polemonium Federal State: [blank] CRPR: 2B.2 Scientific Name: Potentilla newberryi Common Name: Newberry's cinquefoil Federal State: [blank] CRPR: 2B.3 Scientific Name: Silene bolanderi Common Name: Silene bolanderi Federal State: [blank] CRPR: 1B.2 Scientific Name: Silene greenei ssp. angustifolia Common Name: Red Mountain catchfly Federal State: [blank] CRPR: 1B.2 Scientific Name: Silene hookeri Common Name: Hooker's catchfly Federal State: [blank] CRPR: 2B.2 Scientific	This search appears to be made on a USGS quadrangle map basis which is a much larger area than the BLM land within in the planning area. Search criteria in the comment materials indicate that 180 individual quadrangle maps were included as the basis for the search area. The EIS contains a list of the special status plants that are known to occur on BLM land within the planning area. Additionally, CRPR 2B rankings are not considered to be BLM sensitive species, and as such were not included in the analysis for special status plants. The BLM is held to policy guidance and direction for land use planning decisions. Adding CRPR 2 plants to the special status species list is outside the scope of this plan. Special status species lists are constantly evolving with new discoveries and any special status plants found on BLM lands would be managed accordingly and added to the list.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Matsumoto (cont.)	Kara (cont.)	26 (cont.)	(see above)	(see above)	Name:Trifolium piorkowskii Common Name: maverick clover Federal State: [blank] CRPR: 1B.2 Scientific Name:Trifolium siskiyouense Common Name: Siskiyou clover Federal State: [blank] CRPR: 1B.1 Scientific Name:Triteleia grandiflora Common Name: large-flowered triteleia Federal State: [blank] CRPR: 2B.1 Scientific Name: Viburnum ellipticum Common Name: oval-leaved viburnum Federal State: [blank] CRPR: 2B.3 Please see the attached list of all CRPR taxa with the potential to occur on BLM lands within the NCIP planning area.16 16. <a href="https://www.google.com/url?q=https://drive.google.com/file/d/1qC-zYCuJj7tt5jBmba_CA04zNBjf3sKU/view?usp%3Ddrive_link&amp;sa=D&amp;source=docs&amp;ust=1701453369332216&amp;usg=AOvVaw2lcZfp2pY4edSXsSIUshwH">https://www.google.com/url?q=https://drive.google.com/file/d/1qC-zYCuJj7tt5jBmba_CA04zNBjf3sKU/view?usp%3Ddrive_link&amp;sa=D&amp;source=docs&amp;ust=1701453369332216&amp;usg=AOvVaw2lcZfp2pY4edSXsSIUshwH</a>	(see above)
Matsumoto	Kara	26	Conservation Lands Foundation	Vegetation	The addition and expansion of ACECs being managed for the protection of rare plant species, serpentine habitats, and old growth reserves described in alternative D serves to protect a broad range of sensitive habitats and rare plant species found across the planning area. However, there are documented occurrences of several rare plants, including a federally endangered species, within BLM lands that were not included for analysis in the EIS. Our review of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) shows a documented occurrence of Fritillaria gentneri (Gentner's fritillary) just south of Brushy Gulch associated with populations of Calochortus greenii. Gentner's fritillary is Federally endangered and listed with a California Rare Plant Rank (CRPR) of 1B.1. There are several other CRPR listed species that are present within BLM lands in the NCIP planning area, including many 1B taxa that should be included in the BLM sensitive plant species list. We strongly feel that 2B species should also be included in the sensitive plant species list, while they may be more common outside of California these species are important to the biodiversity of California, and the biodiversity of BLM lands they occupy. While the BLM sensitive vascular plant species list was updated in 2020 we would recommend that the Arcata and Redding field offices create an additional list for species of conservation concern with the potential to be present within the NCIP planning area to more comprehensively account for the impacts of future project activities, including impacts of hazardous fuels reduction projects.	Gentner's fritillary is distributed within the BLM's Cascade Siskiyou National Monument, which is outside of the planning area. The EIS contains a list of the special status plants that are known to occur on BLM land within the planning area. CRPR 2B rankings are not considered to be BLM sensitive species, and as such were not included in the analysis for special status plants. The BLM is held to policy guidance and direction for land use planning decisions. Adding CRPR 2 plants to the special status species list is outside the scope of this plan. Special status species lists are constantly evolving with new discoveries and any special status plants found on BLM lands would be managed accordingly and added to the list.
Murchison	Barbara	90	N/A	Alternatives - lands and realty	Finally, it would be wonderful to expand the existing Sacramento River Bend Area through acquisition of private land within the Area of Critical Environmental Concern. The draft plan proposes to acquire an additional 1,820 acres....a good start. However, my understanding is that there are roughly 12,000 acres of private land in the area. While not all of this land may be available, I would like to see the NCIP propose acquiring as much land as possible from willing sellers in the area to improve recreational opportunities, protect wildlife, and expand on existing natural values.	BLM acquisition criteria can be found in Table B-1. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).
Murchison	Barbara	90	N/A	Alternatives - new special designation nominations	I urge the BLM to seek National Wild and Scenic River protection for the section of the Sacramento River beginning at Ball's Ferry and ending at the stream gauge upstream of Red Bluff. I would also like to see similar protection recommended for the river's tributaries in this section, including Battle Creek, North Fork Battle Creek, South Fork Battle Creek, Inks Creek, Massacre Creek, Paynes Creek, Turtle Creek, and Sevenmile Creek.	The suitability determination for Sevenmile Creek and tributaries has been updated in the Proposed RMP/Final EIS and Wild and Scenic Rivers Suitability Report. All the other creeks listed in the comment are identified as suitable. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.
Murchison	Barbara	90	N/A	Alternatives - recreation	Given the importance of the Sacramento River Bend Area to wildlife (and humans like me seeking some restorative quiet), I would urge the BLM to minimize human disruption/noise in the area wherever possible. Revisions to two sections of the draft plan offer two opportunities to do this: 1. The draft plan currently proposes to "limit OHV use" in the area. Nobody wants to hike alongside OHVs. I would like to see more specificity in the language and recommend changing this to "Limit OHV use to existing roads and trails." 2. The draft plan proposes to limit target shooting to designated areas in the area. I would like to see target shooting prohibited in this area altogether.	OHV limited designations in the Proposed RMP/Final EIS are limited to existing routes until routes are designated in future implementation level travel management planning. Through this planning process, the BLM identified areas where OHV use should be limited or closed to prevent damage to resources. The BLM recognizes the concern related to recreational target shooting. Impacts to recreational users are discussed in Section D.3.6. The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts, by limiting shooting to designated areas only.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Neal	Thomas	I45	N/A	Appendix A: Maps	The roads inventory map for Chappie- Shasta subunit 3 is incomplete. There is a road that accesses the northern end of my private property, (Alpine and Backbone patents) that has been used since at least the early 1980's. This road is presently brushy in spots, and may have been missed by whomever did the inventory. This road was built specifically to access the backside of this mine property and is cleaned up when it is needed. I am pointing this out, because I will use this road when I need to in the future. Changing the classification of this unit does not erase over 40 years of use for this purpose. This subunit should not be reclassified, and if it does, it needs to be redrawn, leaving this road out of it. I am including the roads inventory map with a black line in the approximate location of this road.	A Lands with Wilderness Characteristics inventory was conducted following BLM Policy (Manual 6310). The difference between routes and roads is nuanced and only roads are considered in lands with wilderness characteristics inventories. If the route in question has not been used or maintained recently and it has overgrown, it is questionable whether it should be considered a road in the inventory. Things like an active right-of-way or incorporation into the BLM's maintenance program would indicate that it is a road to consider in the inventory. This road has neither of those things. At this point, the BLM will defer to the work that the lands with wilderness characteristics Inventory Team did for this planning effort. However, inventories are living documents, so the BLM will note the presence of this route for future wilderness inventory purposes. Of note, this area is not being managed with wilderness as a priority, so nothing in the lands with wilderness characteristics section would limit the BLM from maintaining this route in the future or issuing a ROW in the future if site specific analysis indicates there are no other issues.
Neal	Thomas	I45	N/A	Nonrenewable energy and minerals	In reading through the proposed NCIP, I am quite concerned with the lack of mention of the mineral exploration and mining industry. Mining and grazing have historically been two of the major players in the multiple use of public lands, and unlike most other uses, add revenue into the coffers of the United States. The mining industry on public lands, through mining claim and maintenance fees nationwide, generates tens of millions, if not hundreds of millions of dollars annually. It also produces billions of dollars worth of metal and non-metal products that our society and lifestyles require.	Please see Section D.3.5 Nonrenewable Energy and Minerals for information about mineral exploration and development in the planning area.
Neal	Thomas	I45	N/A	Wild and Scenic Rivers (WSR)	On page 92 of the NCIP wild and scenic rivers eligibility report is a listing for Scorpion Gulch. I cannot speak for the rest of the tentative listings in this report, as I am unfamiliar with them, but if there are others that are as embellished in description as this one, they should not be listed. I am intimately familiar with Scorpion Gulch. Having two lode claims that cross it, and having a brother who owns the Empire patent (private property) on the upstream end of it, and having worked at the Washington Mine for over 10 years, I feel I am qualified to say that. Someone without first hand knowledge of this listing, because of its tentative wild and scenic status, could assume that this is a substantial stream, when in reality it is a small, short gulch that in an average summer could be run through a 4" pipe. The historic architectural value spoken of completely burned to the ground in the 2018 Carr fire, and does not exist. There are numerous mines in this drainage, but the Brunswick is not one of them. It lies in the Summit Gulch drainage to the south. This small segment has historic and current roads on all sides of it, and a road running up the bottom of it from its confluence with French Gulch. (Gated private property) Most, if not all of Scorpion Gulch is under claim, lode or placer, or is private property. The Washington Mine currently is a local employer, and in the recent past was, and in the future could be a major employer and contributor to the local economy. It is interesting to note that this particular stream was chosen for inclusion into this status, and not any of the dozens of other local gulches with the same characteristics.	Scorpion Gulch was found to not be suitable in the Proposed RMP/Final EIS. No additional restrictions or limitations are put on Scorpion Gulch. The aim of the Proposed RMP/Final EIS is to balance the multiple uses of these areas while minimizing impacts to sensitive resources.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Neal	Thomas	27	N/A	Wilderness,Wilderness Study Areas, and Lands with Wilderness Characteristics	Reading through the summary of analysis of the WIU Chappie-Shasta Subunit 3, I must make some factual corrections to the description of the mines described here. on the west end of the unit, they were all gold mines, lode and placer. There were no limestone quarries here. The American mine is still active and has another road not shown on the inventory roads map. It states that this unit has values that include the presence of habitat for threatened flora and fauna. Without specific species mentioned, that statement can be applied to all of the rural lands in the state. I am concerned that classifying this subunit as having wilderness characteristics may have more to do with president Biden's Executive order(EO) 14008, specifically section 216, also known as the 30x30 plan, than it's actual merits as an area with wilderness characteristics. I deduce from my reading, that lands with wilderness characteristics and WSA's will be managed in the same general way, and under the BLM's discretion, can prioritize protecting over other resource values and multiple uses. It seems as though once a block of land gets a WSA status, it never comes out. Wilderness study Areas were supposed to allow time to study an area to see if it met the requirements to be designated as wilderness by congress. Unfortunately, this process gets abused, and WSA's are basically wilderness without congressional approval. If we create a new land category, and call it " land with wilderness characteristics", we have now given the power to tie up land using a non impairment management standard to unelected bureaucrats. WSA's were meant to be studied in a reasonably timely manner, and turned into wilderness by an act of congress, or released back to a multiple use status. What are the long term repercussions of listing this subunit as land with wilderness characteristics? would it be off limits to mineral entry? Are they going to be made roadless? Is this a temporary or permanent classification?	Lands with Wilderness Characteristics were inventoried following BLM policy. It is out of the scope of this plan to make changes to this policy. However, in this case, the Chappie-Shasta Subunit 3 will not be managed with wilderness characteristics as a priority. Instead, the BLM will continue to recognize these values, but emphasize other uses. No impacts to uses (such as mining, rights of ways, road maintenance) are anticipated from the Proposed RMP/Final EIS. Wilderness characteristics inventories are living documents, so BLM has noted the presence of this route for future wilderness inventory purposes.
Neal	Thomas	145	N/A	Wilderness,Wilderness Study Areas, and Lands with Wilderness Characteristics	Reading through the summary of analysis of the WIU Chappie-Shasta Subunit 3. I must start by making some factual corrections to the descriptions of the mines here. On the west end, all of the mines were gold, lode and placer. On the East there were possibly some copper mines, but never were there any limestone Quarries. The American Mine is still sporadically active, and the hard closure shown on the picture and map is required to be unlocked for public vehicle use during Deer rifle season. It also has an opening on its south side for pedestrians, horses, bicycles and motorcycles that is open year round.	Thanks for pointing out these possible inconsistencies. Wilderness characteristics inventories are living documents, so we will note this mining history for inclusion in future inventories.
Not Provided	Not Provided	67	N/A	Air quality and climate change	Climate change is already altering and stressing natural systems and communities of native species. The NCIP should provide greater protection to help compensate for those alterations and stresses.	Management actions associated with each of the resources for each alternative have been discussed and provide the information necessary to evaluate actions and alternatives that would have the least impact on air quality and climate change, including both direct and indirect impacts. Many of the resource areas have proposed management and travel-related decisions that limit or reduce surface and vegetation disturbance, increase vegetation and habitats, limit or reduce OHV and other off-trail access, and improve existing roadway and trail surfaces. To the extent these decisions reduce emissions, there may be an insignificant beneficial impact on air quality and climate change. This analysis is not totally inclusive of future potential decisions that may reduce the impacts to the air quality and climate change. In Section D.2.1, it is stated that climate change has and will continue to affect the BLM-administered lands within the planning area. While projected changes in temperature, precipitation, and sea level rise differ based on modeling assumptions, each of these climate components is expected to change during the implementation of the NCIP. By accounting for the potential effects of climate change during the planning process, the BLM can make management decisions that reflect anticipated impacts on vulnerable resources and, therefore, assure with higher probability that the BLM can be attaining its stated planning goals.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Not Provided	Concerned American	11	N/A	Alternatives - livestock grazing	Despite my support for components of Alternatives B and D, I believe that none of the DEIS action alternatives may properly address the need to greatly reduce the cumulative adverse impacts from ongoing livestock grazing. I believe that the final RMP should make any allotments that don't meet required rangeland health standards unavailable for future grazing. Grazing that jeopardizes riparian and other sensitive habitats should also be phased out. There should be the ability for the willing seller sales of existing grazing permits to conservation groups so those allotments can be permanently retired. Please review the attachments relating to the climate change and other impacts associated with livestock grazing on public lands.	Rangeland Health assessments are a separate analysis document, not related to the planning project. They are completed for each allotment and would require a change in allotment management if the allotment was not meeting rangeland health standards (such as reducing stocking rate, season of use, etc.), but would not necessarily require the closing of the allotment. The plan acknowledges we complete RHA's, but we would not close something at a planning level because it failed a lower-level quantitative and qualitative analysis.
Not Provided	Please consider grazing impacts	25	N/A	Alternatives - livestock grazing	In some situations, BLM has supported mitigation requirements that include the voluntary willing seller buy out of BLM grazing permits and then BLM can make those allotments unavailable for future grazing in RMP revisions. This can be a "win, win" situation where the permittees are compensated and there is reliable and effective mitigation for permanent habitat losses from approved land uses such as mining or other intensive developments. Since the NCIP planning can include decisions about the future use of grazing allotments, this is the best time to evaluate allotments that are in new protected areas or that are in degraded conditions.	Following a ruling by the 10th Circuit in Public Lands Council v. Babbitt, the ability to transfer grazing allotments to "conservation use" permit regulatory provisions was eliminated from 43 CFR Part 4100.
Not Provided	Not Provided	38	Hunting and Shooting Sports Roundtable	Alternatives - recreation	We are disappointed, however, that the Draft did not identify other informal recreational shooting sites that may have potential for construction of range as a means of helping to manage recreational shooting, considering the large acreage included in the plan. We request that the final RMP include additional opportunities for future range construction.	The Iron Mountain and Spring Branch shooting ranges came up during public scoping as an important topic to address in this RMP, even though these types of decisions are generally not RMP decisions. The BLM may consider the construction of additional target shooting ranges at the implementation level in the future.
Not Provided	Not Provided	38	Hunting and Shooting Sports Roundtable	Alternatives - wildlife	We appreciate the BLM's recognition of the role that hunting plays in wildlife management and its continued importance as a wildlife-dependent recreational activity. However, within the Wildlife Section, row 86, management direction identifies over 89,000 acres to be managed as critical deer winter range and to pursue opportunities to improve access for deer hunting. We recommend consultation with CDFW to identify crucial habitat (parturition areas, corridors, summer/winter range) for other big game species and include management direction to conserve these habitats and explore land tenure adjustments to improve recreational access to other hunting opportunities.	Table B-1 in the Proposed RMP/Final EIS includes management direction for managing big game species. The BLM will continue to coordinate with CDFW on management and monitoring at the implementation level.
Not Provided	Please consider grazing impacts	25	N/A	Best available science and information	In the context of this planning process, please consider the attached information relating to livestock grazing impacts on public lands. And consider whether lands that BLM may decide to designate as "protected" in the new NCIP will be truly protected including from potential grazing impacts.	Thank you for your comment. We have reviewed the information provided relating to livestock grazing impacts. The BLM management specified in the RMP will conform with the California Rangeland Health Standards to ensure livestock grazing allotments maintain healthy rangelands that provide forage for both livestock and wildlife and provide for the appropriate management and protection of other resource values and uses. An analysis of impacts to other resource values and uses as a result of changes to areas available to livestock grazing are included under each resource section in the plan.
Not Provided	Concerned American	11	N/A	Best available science and information	My primary concern is how the final BLM RMP may authorize human land and energy uses that may or may not contribute to the already extremely serious and rapidly worsening climate and extinction crises. These overlapping crises pose an existential threat to humanity and the health of our planet's biosphere. There is an overwhelming international scientific consensus on the increasing severity of these crises and the urgent need for bold remedial actions. Please review the related, attached IPCC report.	The complexity of future management of the planning area and rapidly worsening climate is noted. Per Section D.2.1, climate change has and will continue to affect the BLM-administered lands within the planning area. While projected changes in temperature, precipitation, and sea level rise differ based on modeling assumptions, each of these climate components is expected to change during the implementation of the NCIP. By accounting for the potential effects of climate change during the planning process, the BLM can make management decisions that reflect anticipated impacts on vulnerable resources and, therefore, assure with higher probability that the BLM can be attaining its stated planning goals.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Not Provided	Not Provided	18	N/A	Beyond Scope	I am concerned that BLM's traditionally regressive management culture may improperly influence the NEPA analysis and ultimate decision on this proposed action. BLM managers may put political expediency ahead of applying modern science, relevant laws, and contemporary public values. Please consider the information in the important attachment. I agree with the need to reform BLM's management culture and the nine specific recommendations to help with that reform process. I especially agree that BLM managers need to be better held accountable for whether their collective decisions and actions contribute to making resource conditions better or worse. Thank you.	This comment is outside the scope of the RMP/EIS. No change has been made. Resource Management Plans must meet the requirements of the National Environmental Policy Act (NEPA), either through the production of detailed Environmental Impact Statements or less-complex Environmental Assessments and related documents. The BLM's National Environmental Policy Act (NEPA) Handbook (H-1790-1) provides specific guidance on the implementation of NEPA analysis.
Not Provided	citizen	15	N/A	Beyond Scope	I believe that BLM's dominant management culture is relevant to the adequacy, objectivity, and outcome of this NEPA analysis. I found an interesting open letter to Interior Secretary Haaland after an internet google search. The letter describes problems with BLM's current management culture (including relating to NEPA compliance) and provides specific reform recommendations. This published letter is pasted into the attached pdf. Please carefully review this attached letter, consider how it may affect this NEPA analysis, and include it in this NEPA project file with my comments. If there is a problem with the attachment, the letter can also be found here: <a href="https://www.counterpunch.org/2021/08/20/the-blm-is-broken-heres-how-to-fix-it/">https://www.counterpunch.org/2021/08/20/the-blm-is-broken-heres-how-to-fix-it/</a> I share the writer's concerns, support his recommended reforms, and urge BLM to move forward to implement these clearly necessary reforms. Thank you very much for your consideration.	This comment is outside the scope of the RMP/EIS. No change has been made. Resource Management Plans must meet the requirements of the National Environmental Policy Act (NEPA), either through the production of detailed Environmental Impact Statements or less-complex Environmental Assessments and related documents. The BLM's NEPA Handbook (H-1790-1) provides specific guidance on the implementation of NEPA analysis.
Not Provided	Not Provided	38	Hunting and Shooting Sports Roundtable	Cooperating Agencies	Specific to the Iron Mountain Target Shooting Area - identification of an area for development of a recreational shooting range on BLM-administered land near Redding will be a huge step forward for managing this underserved activity on public land in California. We support this approach identified in Alternatives C and D. We urge the BLM to work with the California Department of Fish and Wildlife (CDFW) to secure Pittman-Robertson funding for construction of the range. Several of the undersigned NGOs are available to assist the BLM in the range construction effort.	The Iron Mountain and Spring Branch shooting ranges came up during public scoping as an important topic to address in this RMP, even though these types of decisions are generally not RMP decisions. The BLM may consider the construction of additional target shooting ranges at the implementation level in the future.
Odry	Sable	112	Northcoast Environmental Center (NEC)	Consistency with other plans, laws, and regulations	Lastly, we would like to see the BLM work to develop a definition of "mature" and "old-growth forests" specific to the species present within the NCIP, in order to ensure management plans are implemented in accordance with Section 1 of the Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies, (EO 14072).	The BLM defers to the United States Forest Service definitions of mature and old-growth forest with regard to habitat requirements for Northern Spotted Owl (NSO). Scientific research and monitoring indicate spotted owls generally rely on mature and old-growth forests because these habitats contain the structures and characteristics required for nesting, roosting, and foraging. More information can be found in the 2011 Revised Recovery Plan for the Northern Spotted Owl, published by the US Forest Service and available at: <a href="https://www.fws.gov/sites/default/files/documents/NSO_RevisedRP_2011.pdf">https://www.fws.gov/sites/default/files/documents/NSO_RevisedRP_2011.pdf</a>
Odry	Sable	112	Northcoast Environmental Center (NEC)	Consistency with other plans, laws, and regulations	The NEC encourages the BLM to commit to remain consistent with all locally approved plans and policies, Particularly in Trinity County where the will of the people for the last four decades has been very clear that they don't want chemical herbicides used as a management tool.	Consistency with local land use plans is described in Section 1.6 of the RMP/EIS. Management common to all action alternatives includes consistency with existing local and regional land use plans and policies, including those relevant to land use planning in Trinity County.
Odry	Sable	112	Northcoast Environmental Center (NEC)	Consistency with other plans, laws, and regulations	We also encourage the BLM to integrate the Trinity County Community Wildfire Protection Plan into the NCIP.	Consistency with local land use plans is described in Section 1.6 of the RMP/EIS. Management common to all action alternatives includes consistency with existing local and regional land use plans and policies, including those relevant to land use planning in Trinity County.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Odry	Sable	112	Northcoast Environmental Center (NEC)	Monitoring	We appreciated BLM's commitments stated in Chapter 1 of the NCIP EIS, most notably "[m]anaging for diverse, ecologically resilient landscapes and healthy forests will be central to adapting to a changing climate." In order to meet these commitments we would like to see the NCIP adopt research and monitoring plans emphasizing conservation. In particular we would like to see the development of fire ecology studies within the BLM areas, in order to ensure that the RMP is meeting management goals.As stated in chapter 1.4, monitoring and evaluation are essential for an adaptive management approach that will ensure an effective RMP into the future.As ecosystems are forced to evolve to a changing climate, we would like to see public land agencies such as BLM be leading forces in developing and incorporating studies that ensure the most adaptive management tactics are being utilized.This should include consulting conservation and/or ecology specialists when developing management and fire resiliency plans.	The NCIP in Fire/ Fuels, Forestry, and Vegetation sections speak to long term monitoring of vegetation distributions, assessment of effects related to management actions, and evaluating changing vegetation communities in response to disturbance such as wildfire.The NCIP does not propose specific fire ecology studies to evaluate RMP effectiveness as this proposal would be most effective on a project or implementation level analysis. The BLM employs ecologists, foresters, botanists, and fire managers who specialize in ecological process, productivity, and biodiversity on public lands as they relate to proposed management actions or large-scale disturbance.The NCIP is designed to give general guidelines for vegetation types but leaves site specific treatments to the implementation level.
Pedersen	Sarah	118	N/A	Alternatives - lands and realty	NCIP should propose acquiring from willing sellers all undeveloped private lands in the ACEC. (12K acres)	BLM acquisition criteria can be found in Table B-1. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).
Pedersen	Sarah	118	N/A	Alternatives - lands and realty	The BLM should acquire private lands from willing sellers to increase public ownership and resource protection in the Wild and Scenic River corridors.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1 (beginning Row 139).
Pedersen	Sarah	118	N/A	Alternatives - new special designation nominations	-Because they provide key migration corridors between Mt. Lassen and the Central Valley for fish, wildlife, and plants (particularly in response to climate change), an outstanding ecological value should be identified for the eligible/suitable segments of Battle Creek	The Wild and Scenic Rivers Suitability Report has been updated to include a revision to ORVs identified.
Pedersen	Sarah	118	N/A	Alternatives - new special designation nominations	-Sevenmile Creek and its tributaries within the Sacramento River Bend Area should be recommended by the BLM as suitable.	The suitability determination for Sevenmile Creek and tributaries has been updated in the Proposed RMP/Final EIS and Wild and Scenic Rivers Suitability Report.All the other creeks listed in the comment are identified as suitable. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands.At this time, the BLM is not considering changes to the segment lengths.
Pedersen	Sarah	118	N/A	Alternatives - new special designation nominations	-The eligible/suitable segment of the Sacramento River should begin at Ball's Ferry and end at the stream gauge upstream of Red Bluff.	The Wild and Scenic Rivers Suitability Report has been updated to include a revision to ORVs identified. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands.At this time, the BLM is not considering changes to the segment lengths.
Pedersen	Sarah	118	N/A	Alternatives - new special designation nominations	-The Sacramento River Bend Area may more appropriately be managed as a Special Recreation Management Area (SRMA). However, SRMA management should be subordinate to protecting the area's natural and cultural values.	The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts by limiting shooting to designated areas only.
Pedersen	Sarah	118	N/A	Alternatives - new special designation nominations	The BLM should manage the entire Sacramento River Bend Area for VRM II (Retention) to protect the area's existing visual quality.	The BLM has taken the recommendations into consideration in the Proposed RMP/Final EIS.The Sacramento River Bend Area has a high demand for multiple uses and the Proposed RMP/Final EIS aims to balance resource uses while minimizing impacts.
Pedersen	Sarah	118	N/A	Alternatives - new special designation nominations	The eligible/suitable segment of the Sacramento River should begin at Ball's Ferry and end at the stream gauge upstream of Red Bluff.	Segment lengths were determined during the eligibility phase, considering location of BLM managed lands.At this time, the BLM is not considering changes to the segment lengths.
Prijatel	Jean	108	EPA, Region 9	Consistency with other plans, laws, and regulations	The EPA understands the BLM is finalizing a Public Lands Rule.The Public Lands Rule is intended to establish a framework for protecting and restoring healthy landscapes, abundant wildlife habitat, clean water and balanced decision-making on our nation's public lands.The proposal would uphold the BLM's multiple use and sustained yield mission, ensuring the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.The BLM describes the Public Lands Rule as putting conservation on an equal footing with other uses.We recommend the Final EIS include an explanation for how this new rule would impact management of the Northwest California Integrated Resource Management Plan.	The RMP is consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein. An explanation for how the Public Land Rule would impact management of the Northwest California Integrated Resource Management Plan would be outside of the scope of this analysis.The purpose of the NCIP is to make land use decisions to guide the management of BLM-administered lands within the planning area. Planning decisions would integrate current law and policies, as well as current information, to resolve primary issues identified in the planning area, specifically related to increasing human population and changing use patterns, wilderness management, climate change, special status species, and land tenure.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Prijatel	Jean	108	EPA, Region 9	Cooperating agencies	The EPA did not identify significant public health, welfare, or environmental quality concerns to be addressed in the Final EIS. The BLM coordinated early with the EPA and other cooperating agencies and made several documents available for review and comment, including a draft Socioeconomic Report, Analysis of the Management Situation Revision, and an administrative Draft EIS. We appreciate that comments about potential air quality impacts, climate change, and environmental justice that EPA submitted in these earlier documents were addressed in the Draft EIS.	The BLM will continue to coordinate with and engage the Environmental Protection Agency (EPA) and cooperating agencies during preparation of the Proposed RMP/Final EIS.
Rabellino	Devon	117	North Coast Regional Water Quality Control Board	Beyond Scope	-Will the Resource Management Plans for the areas outside of the NCIP planning area - such as the King Range National Conservation Area and Headwaters Preserve - be updated as necessary in the future to conform with NCIP management measures that are more protective of water quality and other natural and cultural resources?	Resource Management Plans for the areas outside of the NCIP planning area will be updated in conformance with the Federal Land Policy Management Act (FLPMA), which requires the revision of land use plans when appropriate, pursuant to Sec. 202. [43 U.S.C. 1712] (a).
Rabellino	Devon	117	North Coast Regional Water Quality Control Board	Consistency with other plans, laws, and regulations	- Regional Water Board staff are currently developing the Federal Lands Permit, which we anticipate will replace the 2015 Federal Waiver prior to NCIP approval. The Federal Lands Permit may modify several procedural and regulatory aspects of the 2015 Federal Waiver and its associated monitoring and reporting requirements. Some of these changes include improving the 2015 Federal Waiver's application to BLM lands; introducing a new regulatory approach to livestock grazing and sediment source treatment; and conducting an updated and expanded environmental analysis for compliance with the California Environmental Quality Act (CEQA). The Federal Lands Permit and supporting CEQA document are anticipated to be proposed for Regional Water Board adoption by fall 2024. Please visit the Federal Permitting webpage(4) and subscribe to the federal lands email subscription list for development updates on the Federal Lands Permit. 4 Federal Nonpoint Source Permitting Webpage: <a href="https://waterboards.ca.gov/northcoast/water_issues/programs/forest_activities/US_forest_service/">https://waterboards.ca.gov/northcoast/water_issues/programs/forest_activities/US_forest_service/</a> .	Thank you for your comment. The RMP is consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein. The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures, and would incorporate guidance from the Federal Land Permit when implemented.
Rabellino	Devon	117	North Coast Regional Water Quality Control Board	Consistency with other plans, laws, and regulations	-The current Federal Waiver and the forthcoming draft Federal Lands Permit will require federal agencies to comply with applicable guidance documents used to guide their planning and decision making, such as the proposed NCIP, other BLM Resource Management Plans, and California State Office's Best Management Practices for Water Quality. As such, Field Office compliance with the management guidelines and standards in the proposed NCIP will in part constitute compliance with the Federal Lands Permit.	Thank you for your comment. The RMP is consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein. The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures, and would incorporate guidance from the Federal Land Permit when implemented.
Randall	Joni	94	N/A	Alternatives - lands and realty	In conjunction with ACEC and Wild and Scenic River Protection, I also ask the BLM to continue acquiring adjacent properties. A large, more in-tact tract of land will be more suitable and easier to manage, keeping all this beautiful land in pristine condition. Clearly if this section of Deer Creek was found eligible, but not suitable, acquiring more nearby plots would streamline the process of managing Deer Creek, so this section can get the protection it deserves and it would be more suitable to manage.	BLM acquisition criteria can be found in Table B-I. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250).
Randall	Joni	94	N/A	Alternatives - new special designation nominations	Beyond just regarding this section highly for its recreational uses in this amazing river corridor, it is also crucial that the BLM recognizes the outstandingly remarkable ecological value of Deer Creek, specifically for its critical role as a migration corridor for various species. As climate change continues to increase rapidly, extensively protecting areas such as this one are even more critical.	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable wouldn't meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.
Rankin	James	148	SMPA FG Mining District	Alternatives - general alternative comments	Page 2-5 this table gives recommended acreages to be withdrawn from mineral entry by Plan Option A - 0 acres. B - 104,700 acres. C - 55,900 acres. D - 86,100. Page 3-137 lists recommended acreages to be withdrawn for wildlife B - 105,800 acres. C - 70,600 acres. D - 57,000 acres. COMMENT: The differences should be reconciled and more location information should be provided.	Acres have been reconciled in the document with regard to areas withdrawn from mineral entry. See Table B-I for areas that are recommended for withdrawal.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rankin	James	I48	SMPA FG Mining District	Alternatives - specific change to existing alternative	Fire Suppression. Page 2-16 states that Redding area ACEC's will require "modified fire suppression techniques" including BLM consultation and pre-approval to use cross country dozers. Page 2-161 states that where possible use "MIST" minimum impact fire suppression techniques. Page 3-197 states that special permission is needed within ACEC's for some fire suppression tactics. Page 3-198 states that special permission from a BLM rep or the State Director is required to use heavy equipment in ACEC's. COMMENT: In consideration of the damage to the public lands and the adjacent private properties from the Carr, Camp and Zogg fires these restrictions on fire fighting methods and waiting for approvals is not in the best interest of protecting the public and private lands, adjacent private property and lives. The proposed Swasey/Clear Creek ACEC is adjacent to many private homes and the towns of Redding and Shasta. During the Carr fire the aggressive "no holds bared" fire fighting helped to prevent a substantially worse outcome. Aggressive and early fire suppression without delays should be the BLM policy. Anything less is a reckless endangerment and abdication of responsibility.	The NCIP clearly states that areas in special designation or sensitive to fire suppression will be given consideration or utilize Minimum Impact Suppression Tactics. Tiered Fire Management Plan documents are the most appropriate place to identify suppression tactics, identify resource types to use or avoid, and the required deployment of personnel in mitigation of potential impacts.
Rankin	James	I48	SMPA FG Mining District	Alternatives - specific change to existing alternative	Page 2-16- plans B,C and D state "surface disturbances, such as through metal detection without a permit or other authority are not allowed". Comment: Page 3-326 notes that the use of metal detectors falls within the description of allowable "casual use mining". Pages 3-306, 3-307 notes that decisions regarding mining / prospecting would require a Section 106 review before implementation. In addition the French Gulch / East Fork Clear Creek Mining Districts have exercised their authority and recognized the use of metal detectors as a valid prospecting and mining method. The statement from the plan referenced above should be stricken. Page 3-330 states that dredging would not be allowed in ACEC's. Comment: I do not believe that this mining restriction can be initiated within this planning format. The BLM and Forest Service allow dredging in adjacent states with proper permitting. I do not know of a complete Federal ban or moratorium on dredging. The California State Waterboard has been working on state dredging regulations. They have not yet issued their second draft for public comment. It would be premature to issue a plan wide dredging moratorium, before this long running state effort is completed. It is difficult to provide "substantive" counterarguments against this proposed moratorium, since individual streams are not listed, nor are the reasons for the proposed restrictions given.	Prohibitions or limitations on metal detecting have been replaced with language pointing to 43 CFR 3809.31(a) regulations.
Rankin	James	I48	SMPA FG Mining District	Alternatives - specific change to existing alternative	Pages 2-197, 3-462 These both recommend that areas with wilderness characteristics be withdrawn from mineral entry. COMMENT: In the Redding area the Chappie wilderness characteristics area has been heavily mined in the past. It contains several current mining claims and private patented mine sites. This area should not be withdrawn from locatable mineral entry. It is an area that has current active mine sites and a locatable mineral withdrawal could inhibit potentially necessary additional filings for these active claims/ private mines.	Thank you for the comment. The Proposed RMP/Final EIS includes management direction for Lands with Wilderness Characteristics in Table B-1. Any area recommended for withdrawal will be reviewed at the implementation level and feedback such as this would be considered at that time.
Rankin	James	I48	SMPA FG Mining District	Alternatives - specific change to existing alternative	Dredging Page 2-128. this page notes that in plan B and plan D dredging would not be allowed. Page 2-212 notes in plan B and plan D dredging would not be allowed on 382,200 acres within the planning area. Page 3-330 notes that dredging would be prohibited. COMMENT: It is difficult to provide substantive comments regarding such generalized statements that do not list specific areas or reasons for the proposed prohibitions on dredging. I am not aware of any general Federal prohibition on dredging. It is commonly done on Federal lands in adjoining states with less restrictive state laws with proper permits. Dredging in California is not prohibited, but under a moratorium until the State Waterboard completes their dredging regulations. I do not believe that such a widespread prohibition of dredging can or should be implemented under a NCIP plan.	The Proposed RMP/Final EIS has been updated to remove language pertaining to the prohibition of dredging.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rankin	James	I48	SMPA FG Mining District	Alternatives - specific change to existing alternative	Roads: Page 2-220. Plan B, C and D all include language regarding the blocking of "unused roads" to "prevent the unauthorized access by the public". COMMENT:As the VP of the Shasta Miners I know how the blocking of the small secondary roads so negatively affects our older members.They often are unable to walk far or carry their gold panning supplies very far.When these "unused" roads are blocked (picture the hated 5 big rocks) it effectively prevents many mobility impaired people from using these public lands.As these secondary lesser used roads are blocked it affects the access for hunters and other users of these lands, without some use and minimal maintenance these roads are soon lost and no longer available for fuels management projects and fire fighting access.A significant portion of the secondary roads in the Carr fire scar have been blocked by fallen trees for so long that they are now being overgrown and becoming unusable due to lack of maintenance.	Thank you for the comment.The statement has been corrected to remove language in reference to blocking of "unused roads."
Rankin	James	I48	SMPA FG Mining District	Alternatives - new special designation nominations	Page 2-192 through 2-195 list the "river" segments proposed to be managed as potentially WSR. Plan A and B propose 117 segments (201.7 miles) as potential WSR. Plan C (3) and D (56) segments.These segments include special management within ¼ mile of the designated segments.The proposed management of these segments include many substantial restrictions on currently allowable uses, such as no surface disturbing activities, prohibitions on mineral leasing and mineral materials development, recommended for locatable mineral withdrawal. Page 3-443 propose to prohibit dredging in the Klamath River WSR corridor (see comments on dredging). COMMENT: I am not familiar with all of the "river"segments proposed for these protected designations, however I know some of them well. Under proposal A and B Scorpion Gulch is listed as scenic. I have a placer claim covering the proposed section. In addition there are 2 lode claims in the same area. I would be open to walk this stream section with someone who can explain how this stream qualifies as "scenic". It is less than a foot wide and a couple of inches deep. Even though it was mined in the distant past, all the evidence of that has been erased by 1950's and 60's work. I find it hard to believe that anyone would think Scorpion Gulch deserves this designation. If designated, it would result in increased restrictions and costs to the mining claimants (see comment under locatable minerals). I have grave concerns that other streams listed may be in a similar situation.The more substantial streams listed will result in significant restrictions to the current uses of these streams.Without getting locked into the rigid requirements of managing as potential WSR the BLM already has the management tools necessary to protect these streams on an individual, more responsive basis.	Scorpion Gulch was found to not be suitable in the Proposed RMP/Final EIS. No additional restrictions or limitations are put on Scorpion Gulch.The aim of the Proposed RMP/Final EIS is to balance the multiple uses of these areas while minimizing impacts to sensitive resources.
Rankin	James	I48	SMPA FG Mining District	Alternatives - new special designation nominations	Sacramento River Bend ACEC: This proposed ACEC includes riparian areas along the Sacramento river and Battle Creek as well as the adjacent uplands.The adjacent uplands contain the Spring Branch target shooting area. COMMENT:The adjacent uplands are of a completely different character from the riparian areas and will require different management procedures. It seems that if this ACEC area was changed to exclude the uplands the public shooting area could remain and a different management of this area could be instituted.	R&I values are for both the riparian and uplands portions of the ACEC. Hunting is open except for administrative sites (Parking lots and Sherman Ranch). Substantial target shooting outside of designated areas would impact R&I values.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rankin	James	148	SMPA FG Mining District	Alternatives - recreation	Page 3-179 states in part " the use of metal detectors would not be allowed in ACEC's--" Page 3-501 states: " Minerals: Casual mining and prospecting, particularly the use of metal detectors, would not be allowed within ACECs, especially those identified with important cultural values". Pages 3-206, 3-207, discusses concerns regarding mining / prospecting and cultural resources. It notes any decisions would require a Section 106 review before implementation. Page 3-326 notes that the use of metal detectors are included within the definition of "casual use" mining. COMMENT:The use of metal detectors for locating minerals - particularly gold is acceptable as "casual use" mining. The French Gulch / East Fork Clear Creek Mining Districts have recognized the use of metal detectors as an approved method of prospecting and mining. A Section 106 review and careful consideration of the allowable "casual use" of metal detectors for mining and prospecting should be considered before the proposed restrictions are implemented. The use of metal detectors for "nugget hunting" is very popular in most of the areas being proposed for the prohibition of their use.	Prohibitions or limitations on metal detecting have been replaced with language pointing to 43 CFR 3809.31(a) regulations.
Rankin	James	148	SMPA FG Mining District	Consistency with other plans, laws, and regulations	Pages 1-8 of the plan outline the planning priorities. Among them are the preservation of 30% of lands by 2030 and creating "millions of union jobs". I did not find any specifics portions of the plan that address creating "millions of union jobs". Was this omitted or is the BLM able to choose which plan priorities they incorporate into this management plan? On page 1-10 I find a table that gives the areas of conserved lands per plan. The percentages range from a low of 54% to a high of 84%. In my reading of the plan "conserved" equates to substantial restrictions on public access and current uses for these public lands. All of these plans (A, B, C and D) far exceed the stated 30% goal at the expense of the public land users. COMMENT: These restrictions / "conserved" areas should be reduced.	The BLM believes that the range of alternatives analyzed was reasonable for NEPA. Alternative C favors community use broadly, including focusing on recreational access and recreational development. Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.
Rankin	James	148	SMPA FG Mining District	Nonrenewable energy and minerals	Page 3-327. This includes an analysis of the proposed locatable mineral withdrawals. In part it states "The BLM does not anticipate impacts on locatable mineral activities in the decision area associated with the recommended withdrawals or any other proposed management decisions" it then states " If a recommendation for withdrawal was enacted, withdrawn areas would no longer be available for staking new claims, resulting in a reduction in the availability of locatable mineral resources on BLM-administered lands, and the development of existing claims in withdrawn areas would require a validity examination, resulting in increased costs of development." COMMENT: These 2 statements are a contradiction. The reduction of available areas and increased costs of development are an impact on locatable minerals. There are existing mining claims within these areas that will be subject to increased costs. There is current interest in filing additional mining claims within these proposed areas that would become unavailable.	The BLM does not anticipate any impacts associated with recommendations for withdrawals because a recommendation for withdrawal does not change management and is not a binding action. The decisions being considered in the plan, including making recommendations for withdrawal from locatable mineral entry, do not create any withdrawal or any change to the management of locatable minerals. The BLM cannot propose or make withdrawals in an RMP, only make a recommendation that the Secretary of the Interior consider a withdrawal. There is no requirement that the Secretary of the Interior need consider or accept the recommendation or enact any withdrawal. The Secretary of the Interior may also withdraw areas that have not been recommended for withdrawal. Because of this, withdrawal of any areas recommended for withdrawal in the plan is not considered a reasonably foreseeable future action. The statements are not intended to be an analysis of the impacts of any future withdrawal, merely an example of the type of impacts that might be associated with a withdrawal from mineral entry. Should the Secretary of the Interior choose to withdraw any lands in the planning area a separate analysis of the impacts of that decision will be conducted as required under NEPA. This section has been edited to clarify decisions and impacts for locatable minerals based on the above response.
Rankin	Emily	49	N/A	Outreach/education	This process has NOT been user friendly and is so complicated that it discourages people who are trying to make an effort to comment. Some people thought they had submitted comments when they hit the button, not realizing there was another button to click o .	The BLM has made a diligent effort to involve the public in the National Environmental Policy Act (NEPA) process and carried out public involvement-related activities in accordance with guidance for implementing public involvement under NEPA, codified in 40 CFR 1506.6. A detailed description of public involvement, collaboration and outreach is provided in Section 4.3 of the RMP/EIS.
Reifsnider	Betsy	127	N/A	Alternatives - lands and realty	Purchase private lands from willing sellers to put them into public ownership, thereby protecting more of the Wild and Scenic river corridors.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Reifsnider	Betsy	127	N/A	Alternatives - new special designation nominations	Begin the eligible and suitable segment at Ball's Ferry and end at the stream gauge upstream of Red Bluff. * Identify eligible and suitable segments of Battle Creek.	Segment lengths were determined during the eligibility phase, considering the location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rios	Jessica	128	N/A	Alternatives - lands and realty	Additionally, the BLM should actively acquire private lands from willing sellers to increase public ownership and resource protection in the Wild and Scenic River corridors.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Rios	Jessica	128	N/A	Alternatives - new special designation nominations	I support National Wild and Scenic River protection for the Sacramento River and these tributaries: Battle Creek, North Fork Battle Creek, South Fork Battle Creek, Inks Creek, Massacre Creek, unnamed Sacramento River tributaries 1 and 2, Paynes Creek, Turtle Creek, and Sevenmile Creek. My findings indicate that the eligible/suitable segment of the Sacramento River should begin at Ball's Ferry and end at the stream gauge upstream of Red Bluff. The BLM should recommend Sevenmile Creek and its tributaries within the Sacramento River Bend Area as suitable. This stream is an important part of the overall resource values of the area. An outstanding ecological value should be identified for the eligible/suitable segments of Battle Creek, since they provide key migration corridors between Mt. Lassen and the Central Valley for fish, wildlife, and plants (particularly in response to climate change).	The suitability determination for Sevenmile Creek and tributaries has been updated in the Proposed RMP/Final EIS and Wild and Scenic Rivers Suitability Report. All the other creeks listed in the comment are identified as suitable. Segment lengths were determined during the eligibility phase, considering location of BLM managed lands. At this time, the BLM is not considering changes to the segment lengths.
Rios	Jessica	128	N/A	Alternatives - special designations	In terms of recreational use, given its popularity as a recreation destination and the diversity of its recreation opportunities, the Sacramento River Bend Area would likely be best managed as a Special Recreation Management Area (SRMA). However, SRMA management should be subordinate to protecting the area's natural and cultural values. Recreation in a natural area - or any area - should come second to adequately preserving and respecting it.	Recreation and protection of natural and cultural values are both very important in the Sacramento River Bend area, as the commentor describes. SRMAs are used to define areas where recreation is the predominant use in the area. ERMAs are used to define areas where recreation is managed commensurate with other values. The ERMA designation is the best option to define the importance to recreation, while also recognizing the importance of natural and cultural resource protections in the Sacramento River Bend area.
Rios	Jessica	128	N/A	Alternatives - visual resources	In areas managed for VRM II (Partial Retention, not 'Retention'), the level of change should be moderate and management activities may attract attention but should not dominate the view of the casual observer. The BLM should manage the entire Sacramento River Bend Area for VRM II (Retention) to protect the area's existing visual quality.	The Sacramento River Bend Area has many demands and different areas would be classified under different VRM classes to accommodate multiple uses.
Roberts	Chad	131	N/A	Alternatives - wildland fire	Attached to this letter are two memoranda that consider specific scientific issues related to the management of federal lands in northern California. Both memoranda address potential land management issues that arise in large part because of climate change, as well as from increased knowledge during the past three decades about the science that affects these federal landscapes. As a consequence, the issues are specific concerns that the BLM should address in the NCIP. The memoranda address the following topics, which are fundamental planning concerns in northern California with respect to the effects of climate change and increased climate-related stressors such as fire: ·The Importance of Hardwood Trees and Shrubs in Alternative Stable States of Northern California Landscapes for Planning and Management ·The Critical Zone, Riparian Areas, Ecohydrology, and Climate Change in Northern California Land Management Planning These memoranda are incorporated into this letter as if fully set forth.	Additional information has been added to the Proposed RMP/Final EIS to address these topics.
Roberts	Chad	131	N/A	Best available science and information	The Forest Service's NWFP amendment process is subject to planning-related regulations (the "2012 planning rule") that assure that the Forest Service incorporates "best available science" in developing and approving the NWFP amendment. I encourage the BLM to follow the same regulatory standard in developing and approving the NCIP. Notwithstanding the language of the regulations embodied in the 2012 planning rule, however, there is reason for concern that Forest Service planners and managers may not incorporate the "best available science" in some circumstances, both because some of that "best science" is incompatible with the explicit text in the regulations (regarding a topic called the "historical range of variation") and because the agency has a number of traditional perspectives about managing federal lands that may not be easily compatible with current scientific knowledge. I'm concerned that the BLM process may raise similar conflicts, which I hope this letter can help avoid.	The RMP is consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein of other federal agencies and would incorporate direction from the NWFP.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Roberts	Chad	131	N/A	Vegetation	I have particular concerns about the focus on "moist forests" that dominates the 1994 NWFP, because substantial scientific research in the intervening three decades has demonstrated that the majority of federal land in northern California does not behave ecologically as the NWFP presumed that it did. I suspect that the majority of the BLM-managed land in the area managed by the Arcata Field Office probably is "moist forest", as that is currently understood by scientists in western North America. However, I'm rather sure that most or all of the land managed by the Redding Field Office is something else, namely "dry" or "frequent-fire forest" landscapes. To the extent that the NCIP (both the plan documents and the environmental documents) does not reflect this distinction, it would in my opinion fail to address the current scientific understanding of the region's landscapes.	Vegetation cover types were primarily compiled using habitats described in the California Department of Fish and Wildlife (CDFW) California Wildlife Habitat Relationship (CWHR) database (CDFW 2023), and not the 1994 NWFP. The term "moist forest" only appears in the EIS once. The EIS accounts for a variety of dry and moist vegetation types as well as a range of fire regimes.
Rogers	Wayne	53	Hypower, Inc	Alternatives - lands and realty	Hypower, Inc., a California corporation, is the owner of the 14.5 MW Forks of Butte hydropower station ("Forks") located on Butte Creek, approximately 5 miles north of DeSabra, California and 17 miles northeast of Chico, California. For purposes of locating the area, the intake for Forks is located at elevation 2225, river mile 67.8. The powerhouse is approximately 5 river miles downstream from the intake with water conveyed via a tunnel. The project utilizes approximately 10 acres of BLM land, for passage of the tunnel, and existing access roads to intake, pursuant to a ROW grant. Renewable energy for the benefit of Californians has been generated at Forks for over 30 years. Four miles upstream from the Forks diversion is the Butte Creek diversion of the PG&E DeSabra hydropower project. DeSabra diverts Butte Creek above the Forks diversion into a canal, which bypasses the Forks diversion, and combines water diverted from the West Branch of the Feather River, before returning the now augmented flow from the DeSabra powerhouse to Butte Creek, 0.1 miles downstream from the Forks powerhouse. The overall PG&E project includes the Centerville project whose diversion dam is just downstream of the DeSabra powerhouse, leading to a canal and the Centerville powerhouse. The foregoing is an abbreviated summary of the PG&E DeSabra-Centerville development in this small section of the river which consists of 3 reservoirs, 3 powerhouses, 14 diversion dams and feeder dams and five canals. Portions of this development have been serving Californians since 1900. A schematic of this existing system is attached to this letter. The BLM is undertaking the EIS in support a new Resource Management Plan to address the "changes in resource conditions in the planning area over the last 30 years." (Ex Sum. 2) The RMP would satisfy NEPA by analyzing the effects of proposed management decisions. The EIS considers the direct and indirect effects caused by the proposed actions. Indirect effects are caused by the proposed action but are later in time, however, are still reasonably foreseeable (Sec 3-2). It is these direct and indirect effects that raise concerns for the Forks project. It is requested that the actions proposed be very clear, that existing rights be protected and that adoption of policies not be done with a broad brush, resulting in consequences unintended when they were adopted.	Thank you for your help in understanding the hydropower facilities located on Butte Creek. This comment seems to be concerned with three things: (1) the lack of clarity about valid prior existing rights, (2) the impact that the ACEC designation would have on the existing hydropower projects and (3) the impact that finding Butte Creek suitable for inclusion in the National Wild and Scenic River System (NWSRS) would have on existing projects on Butte Creek. (1) We have added clarification to the Proposed RMP/Final EIS that states that the management direction in the Proposed RMP/Final EIS must honor valid prior existing rights (such as mining claims, ROW authorizations, FERC withdrawals, etc.). (2) The Forks of Butte ACEC was designated in the 1993 Redding RMP and the BLM currently manages the area as an ACEC. The comment does not point out any inconsistencies that have been identified in the last 30 years with managing this area as an ACEC and operating hydropower projects. Management under the Proposed RMP/Final EIS would follow the same boundaries and would change very little about the management of the ACEC from current management. The only additions to the management direction under the Proposed RMP/Final EIS is a ROW avoidance designation. This means new ROWs should be avoided, if at all possible, but are not prohibited. This designation is also subject to the consideration of valid prior existing rights. (3) Butte Creek was deemed eligible for inclusion in the NWSRS with a tentative classification as Scenic. The NWSR Act allows for low dams or small diversion works to be present on a stretch of river in the system. Butte Creek was found suitable for inclusion in the NWSRS by the BLM as described in the Wild and Scenic River Suitability Report. However, it is important to note that suitability does not mean this creek is designated as part of the NWSRS - that is primarily handled by Congress. When found suitable, the creek is not protected by the Act from proposed hydroelectric facilities, re-licensing of existing hydroelectrical facilities or other federally assisted water resources projects that have the potential to affect the river's free-flowing characteristics and other identified values. However, the managing agency should, within its authorities, protect the values that make the river eligible or suitable. The specific management direction in the Proposed RMP/Final EIS mirrors the direction in the Forks of Butte ACEC, with the addition of requiring permitted surface disturbing activities be compatible with and fully protect identified values. This requirement would still be subject to valid prior existing right. Revisions have been made to the analysis in the RMP/EIS, Appendix D has been updated to include this analysis that the existing hydroelectric projects in the Forks of Butte Creek would not be impacted by the decisions made in the Proposed RMP/Final EIS. BLM is not going to alter the boundaries of the ACEC of WSR corridor.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rogers	Wayne	53	Hypower, Inc	Alternatives - new special designation nominations	<p>In the area of Butte Creek from the Forks intake to the powerhouse none of these to be protected values apply. Specifically for this area: Scenic: While we agree that Butte Creek is very scenic, the views of the river are, and have been, impacted by the reduced flow in the reach of the river diverted. Any scenic views by recreationalists are those that currently exist or have existed for over 120 years. The stream gradient is steep and the canyon walls in most areas not accessible. Minimum flows are provided in the diverted reach. It is not appropriate to manage this area for retention of unimpaired flow. To adopt a management plan for this area that includes prescriptions such as "not permit any activities that would adversely effect the free flowing nature" of Butte Creek, or "to protect...with a priority over other uses" or to "manage to minimize water quantity" impacts or manage so that flow is "undiminished" or "new applications for waterpower...will be denied" could result in the unintended impact of placing BLM in position that it must follow the management plan, which failed to distinguish clearly the long existing situation and rights, essentially altering current rights, without justification. Protection is not an alteration of the existing situation. Retention should not be to change, rather to prevent change. Cultural: There are no cultural protected sites in the project boundary. There are cultural sites up and downstream that are not impacted by the project. These sites outside the Forks project boundary include historic hydropower, mining and early native sites. None are applicable within the project boundary. Fisheries: Of major concern is Spring run Chinook Salmon and Steelhead. These species are located downstream from the Forks project and are not impacted by the project, except positively. Flows downstream from the Forks powerhouse are undiminished. Temperature of streamflow is monitored, and the project has had a beneficial effect on streamflow, through the water travelling in tunnel and returning to the river cooler than if it had been exposed to the heating of the ambient environment. Endangered Frog: The Foothill Yellow-Legged frog has not been found in the project boundary. Surveys have been conducted and its habitat is unlikely in the project area, preferring areas of shallow, low gradient stream, which is not characteristic of the Forks project. Historical: The DeSabra Project has been in operation in parts since 1900 and is listed as a historic site (CA-BUT-868). Forks has operated for over 30 years and is located right next door. The DEIS notes the historic hydropower projects, however, the management prescriptions seem counter to preservation. Management of historic properties should not be by altering their operation for a higher determined priority. Historic preservation constantly deals with the issue of removal of historic structures for higher priorities. In this case the status quo and existing developments should be preserved. Particularly when one of the purposes of creating the new management plan is to deal with climate change. Renewable energy generation combats climate change and an unintended consequence of reducing renewable energy in the name of climate change should be avoided. Old Growth Forest: The project has no impact on old growth forest. As outlined above there are NO criteria that would list the area of the Forks project as an ACEC, nor any impact that should be adopted in the event an upstream or downstream section is designated as a Wild and Scenic River. Given the large area (2900 acres) located in a box on the maps, the area of the Forks project should be clearly identified as not included. Future actions by the BLM will be based upon what is adopted in the management plan. It should not be left open to misinterpretation. We propose the following edit to the ACEC, Wild and Scenic River and other sections of the DEIS, FEIS and ROD concerning Forks of Butte: The area encompassed by this designation does not include the project area of the Forks of Butte hydropower station (FERC Project No. 6896).</p>	<p>Thank you for your help in understanding the hydropower facilities located on Butte Creek. This comment seems to be concerned with three things: (1) the lack of clarity about valid prior existing rights, (2) the impact that the ACEC designation would have on the existing hydropower projects and (3) the impact that finding Butte Creek suitable for inclusion in the National Wild and Scenic River System (NWSRS) would have on existing projects on Butte Creek.</p> <p>(1) We have added clarification to the Proposed RMP/Final EIS that states that the management direction in the Proposed RMP/Final EIS must honor valid prior existing rights (such as mining claims, ROW authorizations, FERC withdrawals, etc.).</p> <p>(2) The Forks of Butte ACEC was designated in the 1993 Redding RMP and the BLM currently manages the area as an ACEC. The comment does not point out any inconsistencies that have been identified in the last 30 years with managing this area as an ACEC and operating hydropower projects. Management under the Proposed RMP/Final EIS would follow the same boundaries and would change very little about the management of the ACEC from current management. The only additions to the management direction under the Proposed RMP/Final EIS is a ROW avoidance designation. This means new ROWs should be avoided if at all possible, but are not prohibited. This designation is also subject to the consideration of valid prior existing rights.</p> <p>(3) Butte Creek was deemed eligible for inclusion in the NWSRS with a tentative classification as Scenic. The NWSR Act allows for low dams or small diversion works to be present on a stretch of river in the system. Butte Creek was found suitable for inclusion in the NWSRS by the BLM as described in the Wild and Scenic River Suitability Report. However, it is important to note that suitability does not mean this creek is designated as part of the NWSRS - that is primarily handled by Congress. When found suitable, the creek is not protected by the Act from proposed hydroelectric facilities, re-licensing of existing hydroelectrical facilities or other federally assisted water resources projects that have the potential to affect the river's free-flowing characteristics and other identified values. However, the managing agency should, within its authorities, protect the values that make the river eligible or suitable. The specific management direction in the Proposed RMP/Final EIS mirrors the direction in the Forks of Butte ACEC, with the addition of requiring permitted surface disturbing activities be compatible with and fully protect identified values. This requirement would still be subject to valid prior existing right.</p> <p>Revisions have been made to the analysis in the RMP/EIS. Appendix D has been updated to include this analysis that the existing hydroelectric projects in the Forks of Butte Creek would not be impacted by the decisions made in the Proposed RMP/Final EIS. BLM is not going to alter the boundaries of the ACEC of WSR corridor.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rogers	Wayne	53	Hypower, Inc	Alternatives - new special designation nominations	<p>The mapping tool is a good source for the general public, however, if river segments are intended to be impacted, it should be clearly delineated. In the virtual public meeting it was stated/inferred that a broad view of river segments would be taken, more specifically that any river designated would include the entire river and all of its tributaries. This is too broad a characterization particularly when within the document there are a plethora of impacts to existing rights that could be interpreted from utilizing language that is not precise. Under Areas of Critical Environmental Concern (Sec 3.4) a large portion of Butte Creek above the DeSabra forebay is noted in red as an ACEC (Figure 5). It is not clear why this section was selected as it includes the existing hydropower stations (which is not a "retention" of free-flowing river), nor Chinook Salmon (which are downstream from this area and not impacted, except positively by the hydropower stations). The canyon walls are steep and one must cross on private property (the Forks intake and powerhouse) to access the river. It is not used for recreation around the intake/powerhouse. There is no impact on trees or animals' access to the river. The scenic nature is the river with the existing diversions in place. Utilizing a large block on the map, without a clear delineation and reference that it does not include the existing hydropower river sections, will create misunderstandings and potential future conflict. This is an indirect impact of the management plan that is clearly foreseeable and should be addressed in the FEIS and ROD. Suggested edit: River segments impacted by existing hydroelectric facilities shall not be included under the management mandates surrounding wild and scenic rivers and areas of critical environmental concern unless they alter the quantity of water available in the river downstream of the existing powerhouse.</p>	<p>Thank you for your help in understanding the hydropower facilities located on Butte Creek. This comment seems to be concerned with three things: (1) the lack of clarity about valid prior existing rights, (2) the impact that the ACEC designation would have on the existing hydropower projects and (3) the impact that finding Butte Creek suitable for inclusion in the National Wild and Scenic River System (NWSRS) would have on existing projects on Butte Creek.</p> <p>(1) We have added clarification to the Proposed RMP/Final EIS that states that the management direction in the Proposed RMP/Final EIS must honor valid prior existing rights (such as mining claims, ROW authorizations, FERC withdrawals, etc.).</p> <p>(2) The Forks of Butte ACEC was designated in the 1993 Redding RMP and the BLM currently manages the area as an ACEC. The comment does not point out any inconsistencies that have been identified in the last 30 years with managing this area as an ACEC and operating hydropower projects. Management under the Proposed RMP/Final EIS would follow the same boundaries and would change very little about the management of the ACEC from current management. The only additions to the management direction under the Proposed RMP/Final EIS is a ROW avoidance designation. This means new ROWs should be avoided, if at all possible, but are not prohibited. This designation is also subject to the consideration of valid prior existing rights.</p> <p>(3) Butte Creek was deemed eligible for inclusion in the NWSRS with a tentative classification as Scenic. The NWSR Act allows for low dams or small diversion works to be present on a stretch of river in the system. Butte Creek was found suitable for inclusion in the NWSRS by the BLM as described in the Wild and Scenic River Suitability Report. However, it is important to note that suitability does not mean this creek is designated as part of the NWSRS - that is primarily handled by Congress. When found suitable, the creek is not protected by the Act from proposed hydroelectric facilities, re-licensing of existing hydroelectrical facilities or other federally assisted water resources projects that have the potential to affect the river's free-flowing characteristics and other identified values. However, the managing agency should, within its authorities, protect the values that make the river eligible or suitable. The specific management direction in the Proposed RMP/Final EIS mirrors the direction in the Forks of Butte ACEC, with the addition of requiring permitted surface disturbing activities be compatible with and fully protect identified values. This requirement would still be subject to valid prior existing right.</p> <p>Revisions have been made to the analysis in the RMP/EIS. Appendix D has been updated to include this analysis that the existing hydroelectric projects in the Forks of Butte Creek would not be impacted by the decisions made in the Proposed RMP/Final EIS. BLM is not going to alter the boundaries of the ACEC of WSR corridor.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rogers	Wayne	53	Hypower, Inc	Alternatives - water resources	<p>The maps show a large area of Forks of Butte to be included as an Area of Critical Environmental Concern (ACEC). Of particular interest to Hypower is the area upstream of the DeSabra forebay. In this section, the flow of Butte Creek is diverted by the Forks project pursuant to existing water rights, FERC license and permits. Under the existing RMP (1993) the rights of existing ROW holders are protected both currently and in a renewal. Under the discussion of hydropower (3-321), Alternate A (existing situation) states: Prior and existing rights would be honored. Any existing withdrawals or permit for water power or storage would be recommended by the BLM for extension/renewal. Thus, no impact on existing hydropower generation facilities is anticipated under Alternative A. Alternative B in the current DEIS does not address FERC licensed projects, nor make the affirmative statement that existing rights would be protected, no impact on existing hydropower projects are being created by this RPM and that BLM would recommend extension/renewal of permits without impact. It only deals with two cases: Non-FERC hydropower and new hydropower projects stating: Under Alternate B, non-FERC regulated small scale (&lt;10 MW) hydropower applications would be considered on a case by case basis... Therefore, Alternative B would limit opportunities for new [emphasis added] hydropower projects compared with Alternative A. Under Alternative D (Preferred Alternative) the DEIS states: Impacts to hydropower under Alternative D would be the same as those discussed under Alternative B. Alternative B (and D) therefore lack the assurances specifically existing and stated in Alternative A and are silent on both existing hydropower stations (FERC and non-FERC) and in the scenario of a renewal. Language should be added to the EIS and ROD stating: Prior and existing rights will be honored. Any existing withdrawals or permits for water power or storage would be recommended by the BLM for extension/renewal. Thus, no impact on existing hydropower generation facilities is anticipated under [Alternative B, C, D, Final Alternative].</p>	<p>Thank you for your help in understanding the hydropower facilities located on Butte Creek. This comment seems to be concerned with three things: (1) the lack of clarity about valid prior existing rights, (2) the impact that the ACEC designation would have on the existing hydropower projects and (3) the impact that finding Butte Creek suitable for inclusion in the National Wild and Scenic River System (NWSRS) would have on existing projects on Butte Creek.</p> <p>(1) We have added clarification to the Proposed RMP/Final EIS that states that the management direction in the Proposed RMP/Final EIS must honor valid prior existing rights (such as mining claims, ROW authorizations, FERC withdrawals, etc.).</p> <p>(2) The Forks of Butte ACEC was designated in the 1993 Redding RMP and the BLM currently manages the area as an ACEC. The comment does not point out any inconsistencies that have been identified in the last 30 years with managing this area as an ACEC and operating hydropower projects. Management under the Proposed RMP/Final EIS would follow the same boundaries and would change very little about the management of the ACEC from current management. The only additions to the management direction under the Proposed RMP/Final EIS is a ROW avoidance designation. This means new ROWs should be avoided, if at all possible, but are not prohibited. This designation is also subject to the consideration of valid prior existing rights.</p> <p>(3) Butte Creek was deemed eligible for inclusion in the NWSRS with a tentative classification as Scenic. The NWSR Act allows for low dams or small diversion works to be present on a stretch of river in the system. Butte Creek was found suitable for inclusion in the NWSRS by the BLM as described in the Wild and Scenic River Suitability Report. However, it is important to note that suitability does not mean this creek is designated as part of the NWSRS - that is primarily handled by Congress. When found suitable, the creek is not protected by the Act from proposed hydroelectric facilities, re-licensing of existing hydroelectrical facilities or other federally assisted water resources projects that have the potential to affect the river's free-flowing characteristics and other identified values. However, the managing agency should, within its authorities, protect the values that make the river eligible or suitable. The specific management direction in the Proposed RMP/Final EIS mirrors the direction in the Forks of Butte ACEC, with the addition of requiring permitted surface disturbing activities be compatible with and fully protect identified values. This requirement would still be subject to valid prior existing right.</p> <p>Revisions have been made to the analysis in the RMP/EIS. Appendix D has been updated to include this analysis that the existing hydroelectric projects in the Forks of Butte Creek would not be impacted by the decisions made in the Proposed RMP/Final EIS. BLM is not going to alter the boundaries of the ACEC of WSR corridor.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rogers	Wayne	53	Hypower, Inc	Renewable energy	<p>The Draft EIS notes that there are several areas with hydropower stations with a "concentration of use in the Forks of Butte area" (3-318). It goes on further to state: Although hydropower has numerous benefits, such as power production with low greenhouse gas emissions, cost efficiency, and flexible power generation, adverse impacts on fish migration, changes in flow regime and water quality, loss of biological diversity and population displacement are associated with these developments. (3-318). The paragraph continues describing a project being decommissioned project as an example of hydropower (and ostensibly, its negative impacts). This paragraph unintentionally creates a negative impression of hydropower with the public. The statement further utilizes a generic approach, which in many ways, is inapplicable to the situation in Northern California generally and the Forks of Butte area specifically. Hydropower at Forks of Butte has no (not low) greenhouse gas emissions. Further, the release of water with lower temperatures than naturally occurring results in positive impacts on fish migration in Butte Creek. Changes in the flow regime in Butte Creek has clearly been a positive factor for fisheries. Factually, water diverted by PG&amp;E from the West Branch of Feather increases total flow quantity available in Butte Creek below the DeSabra Powerhouse by approximately 40% in July and August. Water imported by PG&amp;E from West Branch of the Feather River additionally provides needed cool water that does not exist naturally for the benefit of CV Spring-Run Chinook Salmon and Steelhead fish. While the Forks of Butte Project does not divert from another river to Butte Creek, the water travelling through the tunnel arrives downstream at a lower temperature than would have naturally occurred, again aiding downstream fisheries that suffer from both lack of water and higher than optimal water temperatures for fisheries. The Forks project returns the water to Butte Creek without change in quantity. FERC and resource agencies strictly regulate hydroelectric facilities which ensure that any environmental impacts are minimized. While population displacement may take place with large hydropower facilities in foreign countries, it is inapplicable to the California area. The following edit is proposed: Hydropower has numerous benefits, such as power production with no greenhouse gas emissions, cost efficiency, and flexible power generation. Hydropower can provide benefits and enhancements or be harmful to biological diversity, fisheries, including migration, through changes in flow regime and water quality, depending on the operational parameters adopted. If the EIS is to include a hydropower project that is being decommissioned as an example of negative impacts it should include also include an example where there are positive impacts. We would be pleased to provide you further information.</p>	<p>Section D.3.4, Renewable Energy, Affected Environment, Hydropower/FERC Ancillary ROWs, has been revised as follows: Hydropower has numerous benefits, such as power production with few to no greenhouse gas emissions, cost efficiency, and flexible power generation. Hydropower can also result in changes in flow regime, water quality, and water temperature, which can result in adverse or, in some cases, beneficial impacts to fisheries, fish migration patterns, and biological diversity depending on the operational parameters adopted (NREL 2012). For example, the hydropower project on South Fork Battle Creek is currently being decommissioned to increase fish migration and improve habitat as part of the larger Battle Creek Salmon and Steelhead Restoration Project. The project is restoring 42 miles of habitat on Battle Creek and an additional 6 miles on Battle Creek tributaries. Conversely, some hydropower projects are designed to return water to source streams at lower temperatures than would occur naturally or augment return flows with diversions from other water sources, which can create favorable conditions for certain fish species (NOAA Fisheries 2024). FERC and other resource agencies strictly regulate hydroelectric facilities to ensure that any environmental impacts are minimized.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Rogers	Wayne	53	Hypower, Inc	Renewable energy	The EIS document does not distinguish between Run of River hydropower (where water is not stored and released immediately so that instantaneous inflow equals outflow and there is no downstream impact on water quantity) and storage. For example, the DEIS uses in various places "waterpower/storage". These are not necessarily interchangeable terms. Waterpower can include run of river hydro (where there would be no impact downstream) and storage hydro (where water is released with different timing). This is extremely important as the guidance would state that waterpower would not be allowed on any stream that is proposed to be included in the wild and scenic rivers designation (either through interim protection or final). The DEIS refers to a 1.5 mile portion of Butte Creek that may be included as wild and scenic river. If upstream or downstream of a run of river hydropower station, there would be no effect on riverflow, so a blanket prohibition on the entire stream is not appropriate. Neither would it be appropriate to designate a portion of a stream where a historical hydroelectric station is located (as noted on Butte Creek) as the stream is not at that point "wild and scenic." The management plan focus should be on the protection and retention of important values and not used as a method to alter existing uses. Recommended edit: Distinctions should be made between run of river hydropower and storage projects throughout the DEIS. (If specific pages or language input requested, please let us know and we will prepare a detailed page input)	The BLM acknowledges the difference between run of river and storage hydropower projects and that power/storage are not necessarily interchangeable terms. However, we have reviewed the mentions of hydropower and storage projects and the context in which these project types are discussed throughout the RMP/EIS and determined that the distinction between run of river and storage hydropower projects does not significantly affect or add value to the overall analysis. No changes have been made regarding this distinction.  WVSR suitability and any associated restrictions would only apply to the given segment of the stream, not the entire stream. The BLM has already determined that Butte Creek is suitable for inclusion in the NWSRS with a tentative classification as Scenic, as described in the Wild and Scenic River Suitability Report. The NWSR Act allows for low dams or small diversion works to be present on a stretch of river in the system; therefore, the BLM has determined that the presence of the existing hydroelectric facility does not affect the segment's suitability.  Revisions have been made to the analysis in the RMP/EIS. Updates have been made to the Renewable Energy > Environmental Consequences section of the RMP/EIS to better capture how suitability designations would impact hydropower development.
Sadowski	Dan	96	N/A	Alternatives - lands and realty	Moreover, I encourage the BLM to actively pursue the acquisition of private lands within this corridor from willing sellers. Such acquisitions would significantly enhance public ownership and bolster resource protection in the Wild and Scenic River corridor and ACEC. This strategy not only promotes conservation but also facilitates greater public access and enjoyment of these pristine natural areas.	BLM acquisition criteria can be found in Table B-1. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250)
Sadowski	Dan	96	N/A	Alternatives - new special designation nominations	Additionally, it is imperative that the BLM recognizes the outstandingly remarkable ecological value of Deer Creek, particularly its critical role as a migration corridor for various species. This recognition is more important than ever, as we face the challenges of climate change. Deer Creek serves as an essential pathway for species adaptation and survival in changing environmental conditions. Protecting this corridor is not just about preserving a scenic river; it is about ensuring ecological resilience and biodiversity in the face of global climate shifts.	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I. Protection of the Deer Creek as an ACEC appropriately addresses these values.
Simpkin	John	98	N/A	Alternatives - lands and realty	I think BLM should acquire private lands from willing sellers to increase public ownership and resource protection in the Wild and Scenic River corridor and ACEC	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Simpkin	John	98	N/A	Alternatives - new special designation nominations	I think BLM should recognize an outstandingly remarkable ecological value for Deer Creek due to its importance as a migration corridor for species to survive climate change.	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. Protection of Deer Creek as an ACEC would appropriately address these values. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I.
Sleight	Roger	45	Shasta Miners Prospectors	Alternatives - recreation	Recreational mining and casual metal detecting are popular activities in areas of Northern California; particularly in Shasta, Trinity, and Siskiyou Counties. The withdrawal of locatable entry would severely hamper access to areas for recreational mining. VRM decisions should not limit casual/recreational mining as typical small scale activities have a minimal impact on resources. Casual metal detecting should be allowed in ACECs as it has a minimal impact. Metal detecting enthusiasts using proper mining practices have little to no lasting effect on the environment. Recreational mining and metal detecting is a great tool in reducing and eliminating trash and other metals such as lead from the environment. The preferable choice of plan is "Plan C" as it allows a broader recreational component as opposed to a strict conservation agenda.	Prohibitions or limitations on metal detecting have been replaced with language pointing to 43 CFR 3809.31(a) regulations.
Sorenson	Brenda	121	N/A	Alternatives - new special designation nominations	Please include the proposed 5.7 miles of Butte Creek as part of the National Wild and Scenic River. The creek is important to the salmon, the largest wild run of spring chinook salmon!	Segment B for Butte Creek was included as a suitable segment. See the Wild and Scenic Rivers Suitability Report for more information.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Straub	Carolyn A.	29	N/A	Alternatives - lands and realty	Prioritize acquisition of new lands from willing sellers along key riparian corridors, in critical deer winter range, wetland habitat, wildlife migration corridors, coastal areas, habitat for sensitive species, proposed and designated Wild and Scenic River corridors, lands that would provide recreation access, lands within or nearby Wilderness, WAs, and LWCs, and lands that improve water quantity and water quality.	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Straub	Carolyn A.	29	N/A	Alternatives - new special designation nominations	BLM, please:: <ul style="list-style-type: none"><li>• Manage the following "lands with wilderness characteristics" (LWC) in order to protect those characteristics, as a priority: Cahto Peak, Camp St. Michel, Chappie-Shasta, Grass Valley South, Sacramento River Bend. (LWC is the BLM term for the wildest and least developed tracts of land that it manages.)</li><li>• Manage 12,110 acres of English Ridge, Gilham Butte, Trinity Alps, Red Mountain and Yolla Bolly as Wilderness Study Areas.</li><li>• Designate the following Areas of Critical Environmental Concern (ACECs): Eden Valley, North Fork Eel, Beegum Creek Gorge, Deer Creek, Gilham Butte, Grass Valley Creek, Sacramento River Bend, Shasta and Klamath River Canyon, Upper and Lower Clear Creek and Willis Ridge.</li><li>• Recommend 117 eligible river segments for National Wild and Scenic River protection. This would include several salmon and steelhead streams in the Sacramento River watershed, including the Sacramento River and several tributaries (Battle Creek, Paynes Creek, Beegum Creek, Butte Creek, Clear Creek, and Cottonwood Creek), three tributaries to the Trinity River (Canyon Creek, Indian Creek, West Weaver Creek), several Eel River tributaries (Cedar Creek, Elder Creek, Elk Creek, Hulls Creek), Lacks Creek in the Redwood Creek drainage, and the Shasta River (an important coho salmon spawning tributary to the Klamath River).</li></ul>	The Proposed RMP/Final EIS identifies Lands with Wilderness Characteristics, Section 202 WSA, ACEC to be managed as described in Table B-1.
Tenorio	Robie	132	N/A	Alternative D (preferred alternative)	I would also suggest that BLM strengthen the conservation management prescriptions for local lands and waterways that are not presently included in the preferred alternative - and request BLM to adopt the alternative B recommendations for 5840 acres of Gilham Butte as a 202 WSA and include segments of the Mattole River and five important tributaries - Eubank Creek, Grindstone Creek, Sholes Creek, NF Fourmile Creek, and Fourmile Creek - as WSRs. Gilham Butte is a holding that is critically important to the Lost Coast from an ecological perspective. While considered landlocked from public access, the wild character and biological value of this holding is well known. My family and I have participated in local efforts to conserve and protect Gilham Butte for more than 30 years. 2500 acres of the present holdings were designated as both an ACEC and LSR in the 1994 NW Forest Plan. While these designations are significant, the larger 5840 LWC-appropriate acres of the Gilham Butte holding are equally worthy of such recognition, that warrant the highest level of conservation management as a WSA. The outstanding natural resources found here include abundant old growth forest (including outside of the existing LSR) and prime conditions for northern spotted owl, marbled murrelet, and other threatened species that depend on old growth forest habitat. Gilham Butte is also an important wildlife corridor, essentially connecting Humboldt Redwoods State Park and the Bull Creek State Wilderness to the north and King Range National Conservation Area/King Range Wilderness to the south and west. These wildlife corridors have been a long-term vision with great community collaboration and support. With regard to Humboldt Redwoods State Park, Gilham Butte's LWC-appropriate acres directly border state park property, providing incredible potential for public recreational access via an expansive trail system that exists in Humboldt Redwoods State Park.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Tenorio	Robie	132	N/A	Alternative D (preferred alternative)	Various conservation acquisitions and easements in this area over recent decades comprise what is known as the Redwoods To The Sea Corridor, a statewide identified Essential Corridor of High Biological Value. Backpackers, equestrians, and trail enthusiasts have long dreamed of a Redwoods To The Sea Trail through this corridor. A trail system like this would be an outstanding recreational asset, connecting the largest tract of contiguous old growth redwoods anywhere in the world to the longest stretch of coastal wilderness in the lower 48 states - with the wild lands of Gilham Butte in between. Not only would this visionary project allow public access to Gilham Butte, it also has the potential to be a major economic driver, drawing tourists to an otherwise depressed economic region that is increasingly looking to public lands and outdoor recreation for economic sustainability. Because of this potential, and the larger wilderness characteristics present at Gilham Butte, not only would WSA designation be appropriate for the LVC-recommended acres, but an upgraded VRM to no less than level 2 should also be adopted for the entirety of the Gilham Butte holdings to protect its outstanding scenic qualities. I also hope and encourage that continued acquisitions could occur to expand the Gilham Butte holdings and further build out the Redwoods To The Sea Corridor.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the special designations carried forward in Table B-1.
Tenorio	Robie	132	N/A	Alternative D (preferred alternative)	With regard to WSRs in the Lost Coast region, please consider moving all Mattole River segments and tributaries listed in Alternative B to the preferred alternative. These include segments of Grindstone Creek, Sholes Creek, Eubank Creek, NF Fourmile Creek, and Fourmile Creek, totaling 14.7 miles, 2.7 of which flow through BLM land. In addition to the outstanding scenic and/or wild characteristics of these streams, they also provide outstandingly remarkable anadromous fish value and are crucial in supporting healthy flows in the Mattole River. Though WSR designation is strongly encouraged, because of statewide interest in conserving the Mattole River watershed, the BLM - at a minimum - should retain eligibility of the Mattole segments and these tributaries to maintain interim protection of the fish values.	The BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I. The BLM will continue to manage segments determined to be non-suitable in accordance with BLM policy. Agency-identified study river protection continues unless a river is determined not suitable for designation. For non-suitable Section 5(d)(1) rivers, protection of river values reverts to the direction provided in the underlying land use plans for the area (guidance provided by Interagency Wild and Scenic Rivers council).
Todd	Robin	130	Maryland Ornithological Society	Alternatives - travel management	Off-road Vehicles: The MOS recommends that off-road vehicles (ORV) be restricted to routes already designated for their use and be barred from WSAs and from Lands with Wilderness Characteristics. The final plan should establish a process for reviewing existing ORV routes and identifying those that are creating impacts against bird and wildlife habitat. The impacts are problematic especially where ORVs travel in riparian habitat, where vehicles cross streams, or where they travel in a streambed. Any such routes should be closed and rehabilitated to restore the damaged habitat.	This will be done at the implementation level during travel management planning following the completion of the NCIP.
Venturino	Jeff	126	N/A	Alternatives - lands and realty	The BLM should work to acquire lands from willing sellers to increase public ownership and resource protection,	BLM acquisition criteria can be found in Lands and Realty - Land Tenure, Table B-1.
Venturino	Jeff	126	N/A	Alternatives - lands and realty	work with local partners to improve access to the area at Ponderosa Way,	Acquired lands would be managed similarly to adjacent BLM-administered lands, unless the BLM determines specific management needs unique to those acquired lands. The BLM would work with willing sellers to acquire lands. Table B-1, includes acquisition criteria.
Venturino	Jeff	126	N/A	Alternatives - new special designation nominations	The Resource Management Plan fails to provide an updated management plan in Alternative B, C, or D that adequately protects the Deer Creek corridor and ACEC. While the document's stated reasons on the need for an update to the plan are clear, it is a substantial oversight to leave Deer Creek out of those alternatives, and a revised version of the document with adequate resource protections for that creek should be prepared.	The BLM recognizes the regional importance of Deer Creek; however, the BLM has determined that with the small amount of river mileage managed by the BLM, managing this area as suitable would not meaningfully contribute to the protection of the river's free flowing condition, water quality, and ORVs. See the Wild and Scenic River Draft Suitability Report for details on each segment in Appendix I. ACEC management is detailed in Table B-1 and Section D.4.1.
Wasielewski	Jeff	99	N/A	Alternatives - lands and realty	The BLM should acquire private lands from willing sellers to increase public ownership and resource protection in the Wild and Scenic River corridor and ACEC.	BLM acquisition criteria can be found in Table B-1. Lands and Realty - Land Tenure (beginning Row 139) and additional criteria for ACECs (beginning Row 250)

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Winn	Rose	65	California Four Wheel Drive Association	Alternatives - general alternative comments	As currently written, each the proposed alternatives presented in the NCIP would negatively impact Cal4Wheel members, as well as all members of the general public who enjoy outdoor recreation on BLM managed lands, by significantly minimizing their ability to access public land. The NCIP fails to provide a recreation alternative as required by NEPA. While Alternative A would not change existing management practices, it would therefore also fail to optimize outdoor recreation as a high-value use of BLM managed land across the 382,200 acres that are encompassed within the footprint of the NCIP. Alternatives B, C, and D would all reduce public access to outdoor recreation in a variety of ways. The alternatives presented in the NCIP serve to diminish (at best) or eradicate (at worst) the multiple-use mandate by which the BLM is required to manage public lands.	The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section 1.4 Planning Process. Alternative C favors community use broadly, including focusing on recreational access and recreational development. Alternative C does still respond to other resource concerns with proposed protections (like wilderness character and ACECs), but it is not the focus of the alternative. Recreation use and access is less restrictive in Alternative C as shown in Table B-1 for acreage comparisons between alternatives, particularly in categories like acres of Recreation Management Area designated and acres of OHV closed and limited.
Winn	Rose	65	California Four Wheel Drive Association	Alternatives - general alternative comments	Furthermore, Cal4Wheel contests the validity of the NCIP based on BLM failure to evaluate alternative means to accomplish the goal of the action, and, rigging of the purpose and need section of a NEPA process to limit the range of alternatives. The Purpose and Need, and the content of Alternatives B, C, and D are in direct conflict with one another. We subsequently assert the legal requirement for BLM to retract the proposed NCIP and return to the Scoping phase in order to rectify this issue.	There was a comprehensive scoping process and the action alternatives are different ways to achieve the purpose and need. The action alternatives were devised as a result of a comprehensive analysis and review by the BLM Interdisciplinary Team that took into account various factors, including input from the public during public scoping periods, inventory of current conditions, potential management opportunities and constraints, technical feasibility, and environmental impacts. The goal of the range of alternatives developed was to explore a range of options that address the purpose and need that was informed by these factors.
Winn	Rose	65	California Four Wheel Drive Association	Alternatives - new special designation nominations	Alternatives B, C, and D will each advance the creation or expansion of designated lands with "wilderness characteristics," Wilderness Study Areas (WSA), Wild and Scenic River segments (WSR), and Areas of Critical Environmental Concern (ACEC). Lands with wilderness characteristics, WSAs, WSRs, and ACECs all result in policies that reduce or eliminate public access within the border of lands defined with those designations. Specifically, public access via OHV motorized recreation is consistently, significantly reduced, if not completely eliminated within lands with wilderness characteristics, WSAs, WSRs, and ACEC. We assert that the BLM must remove the creation or expansion of all such designations within the NCIP as it escalates discrimination of members of the public with disabilities. The BLM is accountable to their mission and directive to manage our public lands for public benefit. Management policies that result in closures of areas, roads, and trails within BLM managed lands, including OHV road closures, eliminate or restrict motorized access and thereby create discrimination against people with disabilities. We believe that maintaining motorized access to public lands is critically important, as it provides a mode of access that persons with disabilities can use and enjoy.	The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-1, Row 352) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan. The Land Tenure section of the Proposed RMP/Final EIS (starting on Row 139 of Table B-1) contains goals, objectives, and management direction where the BLM will look for opportunities to improve public access, which could also support motorized public access.
Winn	Rose	65	California Four Wheel Drive Association	Alternatives - new special designation nominations	In regard to discrimination of disabled users, the NCIP violates the BLM requirement to maintain compliance with federal regulation by imposing public land management policy that contravenes EO 13985. The BLM must, in order to achieve compliance with EO 13985, eliminate creation or expansion of lands with wilderness characteristics, WSAs, WSRs, and ACECs.	The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-1, Row 352) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan. Additional information has also been added to Section D.5.2 of the EIS to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Winn	Rose	65	California Four Wheel Drive Association	Alternatives - recreation	<p>Elimination of a Recreation Emphasis alternative constitutes an explicit violation of the requirements of NEPA analysis in multiple ways:</p> <ul style="list-style-type: none"><li>- Agencies shall rigorously explore and objectively evaluate all reasonable alternatives</li><li>- Alternatives analysis is both independent of, and broader than, the EIS requirement</li><li>- The entire range of alternatives presented to the public must encompass those to be considered by the ultimate agency decisionmaker</li><li>- In defining the project limits the agency must evaluate alternative means to accomplish the general goal of an action and cannot "rig" "the purpose and need section of a NEPA process to limit the range of alternatives</li><li>- An agency must perform a reasonably thorough analysis of the alternatives before it; the "rule of reason" guides both the choice of alternatives as well as the extent to which an agency must discuss each alternative</li><li>- The discussion of alternatives must go beyond mere assertions if it is to fulfill its vital role of exposing the reasoning and data of the agency proposing the action to scrutiny by the public and by other branches of the government</li></ul> <p>Cal4Wheel contests the absence of a Recreation Emphasis alternative based on the legal precedent that a NEPA analysis is invalidated by the existence of a viable but unexamined alternative. We subsequently assert the exigence that the BLM retract the proposed RMP / EIS and return to the Scoping phase in order to revise the NCIP to include a robust, fair, and complete analysis of a Recreation Emphasis alternative.</p>	<p>The BLM analyzed a reasonable range of alternatives as required by NEPA, as described in Section I.4 Planning Process. Recreation use and access is less restrictive in Alternative C; the Proposed RMP includes acres for OHV open and limited designations. Further, Alternative C proposed acres within SRMAs and ERMA's that provide unique opportunities for recreation based on public input, current conditions and opportunities, and potential for resource impact.</p>
Winn	Rose	65	California Four Wheel Drive Association	Environmental justice	<p>Additionally, EO 13985 requires that the BLM refrain from imposing discrimination of impoverished communities through implementation of public land management plans and policies. Cal4Wheel is concerned about the negative economic effects that the NCIP will have on communities that are adjacent to BLM managed public lands. The NCIP will detrimentally impact multiple-use recreation, whereas many rural economies and communities that serve as gateway points for BLM managed public lands depend on multiple-use recreation for social and economic survival.</p>	<p>As shown in Table B-1, OHV recreation opportunities would be preserved under all alternatives. Furthermore, the recreation section analysis states that under Alternative B, although there would be fewer opportunities, the vast majority of opportunity would continue to exist, in some cases with improved trails and management that could improve quality for OHV users.</p> <p>Therefore, the BLM anticipates that recreation use is not being significantly restricted under any alternative. As such, it is unlikely that impoverished communities are facing perpetual systemic barriers to recreation opportunities or that environmental justice communities being negatively and/or disproportionately affected. The ability to perform quantitative analysis on economic impacts from these management changes on gateway communities is limited by the lack of identified changes to the level and type of recreation visitation use.</p>
Winn	Rose	65	California Four Wheel Drive Association	Environmental justice	<p>Many low-income residents enjoy multiple-use recreation in BLM managed public lands. The NCIP will harm the ability of low-income populations to enjoy motorized or mechanized recreation. Additionally, gateway communities are vulnerable populations, and the BLM neglected to adequately address economic impact on gateway communities when drafting this NCIP.</p>	<p>Economic contributions from recreation management are discussed both qualitatively and quantitatively for Alternative A in Section D.5.1, Socioeconomics. Due to uncertainty related to the impact of proposed management on visitation levels and type of visitation, impacts by alternative are discussed qualitatively by action alternative. BLM's consideration of conservation designations is consistent with FLPMA and the principles of multiple use.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Winn	Rose	65	California Four Wheel Drive Association	Environmental justice	<p>On his first day in office, Biden issued the Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO 13985)7. (7. Executive Office of the President. Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. EO 13985. <a href="https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government">https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government</a> )</p> <p>This executive order established "an ambitious whole-of-government equity agenda" which focuses on addressing "entrenched disparities in our laws and public policies," and mandates a "comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality."</p> <p>Under this executive order, "The term 'equity' means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as "... persons with disabilities..." Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote back country area or traverse the beauty of rugged sand dunes, but many such people are still able to drive Jeeps, side-by-sides, ATVs, and OSVs, which are restricted to the designated motorized route network.</p> <p>Motorized access eliminates ableist bias in BLM management policies, which aligns with the goals of EO 13985. Management policies that focus on minimizing motorized recreation have caused significant decrease in public access to public lands over many decades; this has disproportionately impacted people with disabilities. In alignment with EO 13985, we call attention to and assert the exigence of the BLM to advance equity in public access in all BLM managed public lands by removing management policy that serves to discriminate against those with disabilities.</p>	Additional information has been added to Section D.5.2 of the EIS to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment.
Winn	Rose	65	California Four Wheel Drive Association	FLPMA - Multiple Use	<p>The draft NCIP is problematic given that the alternatives presented serve to diminish or eradicate the purpose and implementation of the multiple-use mandate on BLM managed public lands. As set forth in law, the BLM mission and congressional management directive is to achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of the people of the United States. The BLM's operational guidelines clearly state that the foundational framework for all BLM action is to uphold and expand the multiple-use objective, manage public lands for the benefit of the people (all citizens of the USA), to maintain transparency and accountability in all decisions and actions, to execute decisions in a way that is fair to the public, and most importantly - to follow the law and congressional intent.</p>	<p>The purpose of the NCIP is to make land use decisions to guide the management of BLM-administered lands within the planning area. Planning decisions would integrate current law and policies, as well as current information, to resolve primary issues identified in the planning area, specifically related to increasing human population and changing use patterns, wilderness management, climate change, special status species, and land tenure.</p> <p>The BLM manages public lands for multiple uses and sustained yield in accordance with FLPMA. The BLM makes land use decisions to protect the resources while allowing for different uses of those resources, such as energy and mineral development, timber harvest, recreation, and livestock grazing. When there are conflicts among resource uses or when a land use activity could result in unacceptable or irreversible impacts on the environment, the BLM may restrict or prohibit some land uses in specific areas. To ensure the BLM meets its multiple-use and sustained yield mandate in land management actions, the alternatives' impacts on resource uses are identified and assessed as part of the planning process. The projected impacts on land use activities and the environmental impacts of land uses are characterized and evaluated for each alternative.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Winn	Rose	65	California Four Wheel Drive Association	FLPMA - Multiple Use	Elimination of public access and failure to adhere to the multiple-use objective is a violation of Congressional direction and Congressional intent for the scope of limitations by which the BLM is authorized to manage our public lands. It is critical for the BLM to bear in mind that the BLM does not own our public lands. BLM managed lands are a part of the public endowment, as all public lands are owned by the citizens of the USA (the public); the BLM is merely contracted to manage those lands within the defined scope of limited authority that is granted by Congress. With the NCIP, the BLM is overstepping Congressional direction and Congressional intent such that the best interests and needs of the public are being overrun by an attempt to reduce or eliminate public access to BLM managed lands through unjustified application of management authority.	<p>The purpose of the NCIP is to make land use decisions to guide the management of BLM-administered lands within the planning area. Planning decisions would integrate current law and policies, as well as current information, to resolve primary issues identified in the planning area, specifically related to increasing human population and changing use patterns, wilderness management, climate change, special status species, and land tenure.</p> <p>The BLM manages public lands for multiple uses and sustained yield in accordance with FLPMA. The BLM makes land use decisions to protect the resources while allowing for different uses of those resources, such as energy and mineral development, timber harvest, recreation, and livestock grazing. When there are conflicts among resource uses or when a land use activity could result in unacceptable or irreversible impacts on the environment, the BLM may restrict or prohibit some land uses in specific areas. To ensure the BLM meets its multiple-use and sustained yield mandate in land management actions, the alternatives' impacts on resource uses are identified and assessed as part of the planning process. The projected impacts on land use activities and the environmental impacts of land uses are characterized and evaluated for each alternative.</p> <p>The Proposed RMP/Final EIS (Socioeconomics and Environmental Justice, Table B-1, Row 352) contains goals, objectives, and management direction related to recreational equity that were developed in relation to the Equity Action Plan. The Land Tenure section of the Proposed RMP/Final EIS (starting on Row 139 of Table B-1) contains goals, objectives, and management direction where the BLM will look for opportunities to improve public access, which could also support motorized public access.</p>
Winn	Rose	65	California Four Wheel Drive Association	Outreach/education	While Cal4Wheel appreciates BLM efforts to inform the public through Scoping and environmental assessment as to how the NCIP may impact the public through implementation of the plan, we feel the scope of the RMP / EIS falls dramatically short of BLM minimum requirements to comply with legal standards for scoping and analysis of public land management plan revisions.	BLM has made a diligent effort to involve the public in the NEPA process and carried out public involvement-related activities in accordance with guidance for implementing public involvement under NEPA, codified in 40 CFR 1506.6. A detailed description of public involvement, including the public scoping process, is provided in Section 4.3 of the RMP/EIS.
Winn	Rose	65	California Four Wheel Drive Association	Social and economic conditions	Additionally, it is pertinent to consider the socioeconomic impact of OHV recreation specifically as a core area of impact by the NCIP. Northern California boasts one of the largest networks of OHV routes in the state, with world class OHV roads contained within the NCIP footprint. This network of OHV roads and trails serves as a major draw for OHV enthusiasts from across California and the US to visit northern California for outdoor recreation. Visitors represent a massive contribution to the local economy, as they spend money for lodging, food, and tourism. It is critical for the BLM to prioritize preservation, restoration, and maintenance of OHV roads and trails as part of the scope of the NCIP in order to help local communities rebuild through economic growth and stability.	Economic contributions from recreation management are discussed both qualitatively and quantitatively for Alternative A in Section D.5.1, Socioeconomics. Due to uncertainty related to the impact of proposed management on visitation levels and type of visitation, impacts by alternative are discussed qualitatively by action alternative.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Winn	Rose	65	California Four Wheel Drive Association	Social and economic conditions	Multiple agencies across the federal government, including the BLM, have broadly acknowledged that "the best way to meet the needs of the American people is the Net Public Benefit (NPB)", but the NCIP does not mention or analyze this. The NCIP is lacking in adequate analysis of economic impact resulting from reduction or elimination of public access for OHV recreation and general outdoor recreation. In order to maintain compliance with the standards and protocol required of Congressionally-authorized public land management policies, the BLM must carry forward the Net Public Benefit concept in all land management decisions. Net Public Benefit speaks to and supports the objectives of EO 13985.	<p>Per CFR § 1502.22 - For purposes of complying with NEPA, agencies need not display the weighing of the merits and drawbacks of the various alternatives in a monetary cost-benefit analysis and should not do so when there are important qualitative considerations.</p> <p>As shown in Table B-I, OHV recreation opportunities would be preserved under all alternatives. The Travel and Transportation Management section notes that under all alternatives, the BLM would maintain 190 acres as open to OHV use in the Samoa Dunes SRMA. Travel routes and OHV use within the Samoa Dunes SRMA would continue along the same patterns and trends as currently occurring. Furthermore, the recreation section analysis states that under Alternative B, although there would be fewer opportunities, the vast majority of opportunity would continue to exist, in some cases with improved trails and management that could improve quality for OHV users. Therefore, the BLM anticipates that OHV use is not being significantly restricted under any alternatives. The ability to perform quantitative analysis on economic impacts from these management changes, including use of the travel cost methods, is limited by the lack of identified changes to the level and type of recreation visitation use.</p>
Winn	Rose	65	California Four Wheel Drive Association	Social and economic conditions	In regard to discrimination of impoverished communities, the NCIP violates the BLM requirement to maintain compliance with federal regulation by imposing public land management policy that violates EO 13985. The BLM must, in order to achieve compliance with EO 13985, conduct robust economic analysis of this NCIP on gateway communities, preserve all existing multiple-use recreation opportunities across BLM managed public lands, and expand planning and dedicated resources to increase multiple-use recreation opportunities across BLM managed public lands.	<p>As shown in Table B-I, OHV recreation opportunities would be preserved under all alternatives. Furthermore, the recreation section analysis states that under Alternative B, although there would be fewer opportunities, the vast majority of opportunity would continue to exist, in some cases with improved trails and management that could improve quality for OHV users.</p> <p>Therefore, the BLM anticipates that recreation use is not being significantly restricted under any alternatives. As such, it is unlikely that impoverished communities are facing perpetual systemic barriers to recreation opportunities or that environmental justice communities being negatively and/or disproportionately affected. The ability to perform quantitative analysis on economic impacts from these management changes on gateway communities is limited by the lack of identified changes to the level and type of recreation visitation use.</p>

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Winn	Rose	65	California Four Wheel Drive Association	Social and economic conditions	<p>Of equal importance to assessing the socioeconomic loss from catastrophic fire, is assessment of socioeconomic gain through implementation of vegetation management projects that would restore public lands to greater resilience to future fire incidents. The unburned landscape within the NCIP footprint has become severely overgrown with an excess of trees, underbrush, deadwood, and other biomass. This is an issue that has developed over many decades, and thus, the core factors are fully understood. Furthermore, the BLM explicitly acknowledges that overly dense conditions across BLM managed lands contribute to the risk of high-severity burn. If BLM managed lands are to be restored to a healthy and resilient status, it is critical to resolve over densification through logging, salvage, and removal of excess timber and deadwood, including hazard trees. Congressman Tom McClintock correctly stated in a presentation<sup>10</sup> to support The Resilient Federal Forest Act of 2015, "There's an old adage that excess timber comes out of the forest one way or the other. It's either carried out, or it burns out." (10. Congressman Tom McClintock, 5th District of California. Resilient Federal Forests Act. July 9, 2015. <a href="https://mcclintock.house.gov/newsroom/press-releases/resilient-forests-act">https://mcclintock.house.gov/newsroom/press-releases/resilient-forests-act</a>)</p> <p>In fact, excess timber has not been effectively removed from BLM managed lands for over 30 consecutive years. As noted in an article<sup>11</sup> sharing critique of the role of extreme environmentalism as a direct causal factor for extreme wildfire in California, from 1960 to 1990, 10.3 billion board feet of timber were removed from federal forest land each year. (11. The Federalist. How Misguided Environmentalism is to Blame for California's Wildfires. November 16, 2018. <a href="https://thefederalist.com/2018/11/16/misguided-environmentalism-blame-californias-wildfires/">https://thefederalist.com/2018/11/16/misguided-environmentalism-blame-californias-wildfires/</a>) From 1991 to 2000 that number dropped to 2.1 billion board feet of timber per year, and has remained at an average of about 2.5 billion board feet per year<sup>12</sup> from 2000 to 2021. (12. USDA Forest Service. Forest Products Cut and Sold from the National Forests and Grasslands. Accessed and cited February 12, 2023. <a href="https://www.fs.usda.gov/forestmanagement/products/cut-sold/index.shtml">https://www.fs.usda.gov/forestmanagement/products/cut-sold/index.shtml</a>) Simple calculations quickly demonstrate how the dramatic decrease in removal of timber from federally managed land for over 30 years has contributed to overly dense, fire prone forests.</p> <p>Removal of excess timber would stimulate socioeconomic health in the communities that lie in and near the NCIP footprint through growth in jobs and commerce. Forestry and outdoor recreation represent vital components of the economy in the communities that are local to public lands. In 2020, national GDP from the outdoor recreation industry produced \$374 billion<sup>13</sup>. (13. 13. Bureau of Economic Analysis. Outdoor Recreation. November 9, 2022. <a href="https://www.bea.gov/data/special-topics/outdoor-recreation">https://www.bea.gov/data/special-topics/outdoor-recreation</a>) California takes the lead in financial value added by outdoor recreation over other states across the nation, contributing nearly 12% of the national total, equating to \$44 billion in GDP in 2020<sup>14</sup>. (14. Bureau of Economic Analysis. Regional Data. Accessed and cited February 12, 2023. <a href="https://apps.bea.gov/iTable/?reqid=70&amp;step=1&amp;acrdn=9">https://apps.bea.gov/iTable/?reqid=70&amp;step=1&amp;acrdn=9</a>) Of that \$44 billion, \$1.2 billion is attributed directly to the forestry industry.</p>	<p>The requested analysis of socioeconomic contributions through implementation of vegetation management projects that would restore public lands to greater resilience to future fire incidents is briefly discussed in Section D.5.1, "Impacts Common to All Alternatives". Additional details have been added to support this discussion.</p>
Winn	Rose	65	California Four Wheel Drive Association	Social and economic conditions	<p>The BLM could plan for a better future for recreation on public lands by expanding and improving recreational access, which would align with the multiple use directive for BLM public land management. However, the NCIP introduces new mechanisms for closure of public access for some or all multiple uses through designation of lands with wilderness characteristics, WSAs, WSRs, and ACECs. Closing OHV routes and camping areas is detrimental to rural communities, as noted in the USDA 2010 publication on Jobs, Economic Development, and Sustainable Communities 8. (8. USDA Rural Development. Jobs, Economic Development and Sustainable Communities (2010). <a href="https://www.rccrnet.org/sites/default/files/documents/USDA_Report_2010.pdf">https://www.rccrnet.org/sites/default/files/documents/USDA_Report_2010.pdf</a>)</p>	<p>Economic contributions from recreation management are discussed both qualitatively and quantitatively for Alternative A in Section D.5.1, Socioeconomics. Due to uncertainty related to the impact of proposed management on visitation levels and type of visitation, impacts by alternative are discussed qualitatively by action alternative.</p>



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - fish and aquatic species	To maintain fish and other organism passage new, replacement, and reconstructed stream crossing sites (culverts, bridges, and other stream crossings) shall accommodate at least the 100-year flow and be designed to withstand and to route stream flows into the downstream thalweg in the event the crossing is plugged or is exposed to a flow greater than for which the crossing was designed to pass through. Exceptions may be allowed when an evaluation of site conditions, resource values, infrastructure values, or passage design features demonstrates fish and other organism passage can be maintained without installing a structure that accommodates the 100-year flow. Carson National Forest Plan (2022).	Aquatic organism passage management direction has been added to the Appendix B Riparian Management Areas section, which calls for new or upgraded stream crossings to pass 100-year flow events.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - lands and realty	The NCIP planning team should also consider using existing datasets to specify priority locations for addressing transportation impacts. BLM planning direction is particularly important in contexts where the BLM has the authority to provide or acquire secure land tenure on both sides of a potential wildlife crossing. One area that warrants consideration in this respect is along I-5 and State Route 97 south of the Oregon border (Figure 1), an area identified as a connectivity hotspot at the recent Cascade-Siskiyou Connectivity Symposium (Penrod, 2023). On I-5, a 23.3-mile-long California Priority Wildlife Barrier (CDFW 2020, 2022) stretches from the Oregon border to Yreka and was identified for remediation to benefit species such as mule deer, mountain lion, and gray wolf. There are also several stream crossings on BLM land along or adjacent to this stretch, some of which could be candidates for improvements. South of Yreka, a 6.3-mile segment of I-5 is one of the worst deer-vehicle collision hotspots in the state (Huijser & Begley, 2019). State Route 97, between mileposts 13 and 29.8, is another Priority Wildlife Barrier (CDFW 2020, 2022) that bisects Essential Connectivity Areas and ungulate migration areas (Spencer et al., 2010; Kaufmann et al., 2022). [SEE FIGURE 1, p. 12 (Cascade-Siskiyou Connectivity Area)]	BLM is supportive of wildlife connectivity crossings and will consider projects brought to us on a case-by-case basis. Habitat connectivity is identified as a criterion for land acquisitions.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - recreation	Research increasingly highlights the impacts of recreational activities on wildlife movement (see Wisdom et al. 2018). Given the preferred alternative's emphasis on balancing resource uses such as recreation with habitat connectivity conservation, we suggest additional direction for recreation and visitor use is warranted. For instance, new trail and facility development should consider potential impacts on wildlife in areas identified as important movement corridors.	Revisions have been made to clarify management direction in the RMP/EIS. The Proposed RMP/Final EIS reflects updated language to include direction for considering impacts on wildlife for new trail and facility development. Section D.2.5 also discusses impacts to wildlife from new facility or trail development. Managing short-term corridors in response to a disturbance event will be assessed at the implementation level. The NCIP forestry section also discusses restoring LSR characteristics in forest management.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - recreation	To limit habitat alternations that could impede long range movement to wide-ranging species, new permanent facilities or structures and relocation of existing facilities within key linkage areas should be designed and located so that wildlife movement patterns are not permanently disrupted.	Revisions have been made to clarify management direction in the RMP/EIS. The Proposed RMP/Final EIS reflects updated language to include direction for considering impacts on wildlife for new trail and facility development. Section D.2.5 also discusses impacts to wildlife from new facility or trail development. Managing short-term corridors and specific habitat characteristics in forest management will be addressed at the implementation level. Specifically, the NCIP addresses retaining and promoting characteristics beneficial to fishers and martens in through BMPs.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - recreation	To maintain wildlife habitat connectivity, new recreation development designed for the purpose of increasing recreation use should not be allowed within key linkage areas. New recreation developments may be constructed to address on-going or imminent ecological resource concerns within the key linkage area, including but not limited to, degradation of wildlife habitat connectivity.	Revisions have been made to clarify management direction in the RMP/EIS. The Proposed RMP/Final EIS reflects updated language to include direction for considering impacts on wildlife for new trail and facility development. Section D.2.5 also discusses impacts to wildlife from new facility or trail development. The analysis in the RMP/EIS addresses retaining Essential Connectivity Corridors for wildlife movement and promoting LSRs. Alternative D works to balance recreation while protecting sensitive resource issues.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - water resources	Finally, we also suggest that the NCIP planning team consider adopting or modifying goals, objectives, and management direction from the updated Aquatic and Riparian Conservation Strategy for Region 5 and 6 of the USFS (ARCS) (USDA Forest Service 2018). The ARCS updates the original ACS from the Northwest Forest Management Plan in light of lessons learned and new science and may be a useful framework for aligning cross-boundary restoration efforts.	The BLM has considered updates to the Aquatic Conservation Strategy as a source of information as we modified our Riparian Management Areas management direction in the Proposed RMP/Final EIS. The BLM does not foresee any cross jurisdictional boundary issues.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - water resources	Properly functioning and connected riparian corridors are critical for fish and wildlife movement in a changing climate (Fremier et al., 2018; Krosby et al., 2018). They also provide important ecosystem services such as forage for livestock, recreation, and water quality and quantity regulation. Recent years have seen a growing awareness of the importance and effectiveness of low-tech process-based restoration approaches and the development of new data and tools for strategically prioritizing where they are implemented (Wheaton et al., 2019). To support the strategic and collaborative implementation of riparian restoration, we recommend additional planning direction that emphasizes low-tech process-based restoration (not just BDAs) and the use of the Riverscape suite of tools to prioritize restoration where there is the greatest opportunity to maximize lateral reconnection of floodplains, and longitudinal reconnection of riparian vegetation along riverscapes (see Figure 2). And because riparian restoration requires a multi-scale and multi-pronged approach, coordinated across ownerships, we recommend stronger planning direction for collaboration with state, federal, NGO, and tribal partners.	Revisions have been made to clarify management direction in the RMP/EIS. Appendix B, Table B-1 (Riparian Management Areas Management Action and Water Quality) has been updated to revise methods and collaboration with applicable agencies and Tribes.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	1. To reduce the risk of population-level fragmentation, when working in fisher key connectivity areas and/or fisher travel routes: a. Retain higher canopy cover in drainages, north facing slopes, and riparian corridors where conditions permit. b. Avoid creating areas with less than 30 percent tree or shrub cover and devoid of other hiding structures that would completely sever a potential corridor.	This comment is outside the scope of the RMP/EIS. No change has been made. Species specific concerns would be addressed at the implementation level. If fishers are eventually listed, the BLM will consult with USFWS, and until that time we will manage as a sensitive species according to BLM policy.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	2. Consider improving fisher connectivity where cover is lacking by retaining some brush piles or slash piles with characteristics such as: a. Large enough for fisher use, generally 10 feet by 15 feet in size. b. Containing at least two large-diameter logs. c. Containing large enough interstitial spaces for fisher to move and hide within the pile.	This comment is outside the scope of the RMP/EIS. No change has been made. Species specific concerns would be addressed at the implementation level. If fishers are eventually listed, the BLM will consult with USFWS, and until that time we will manage as a sensitive species according to BLM policy.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	3. Following large severe disturbances and in other deforested areas, consider identifying and managing some areas to serve as short-term corridors between existing habitat patches. Manage conifer restoration or reforestation on other areas to recover lost mature forest habitat:	This comment is outside the scope of the RMP/EIS. No change has been made. Species specific concerns would be addressed at the implementation level. If fishers are eventually listed, the BLM will consult with USFWS, and until that time we will manage as a sensitive species according to BLM policy.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	4. For short-term corridors that facilitate fisher movement across disturbed areas: a. Look for areas that can provide 40 to 60 percent total canopy (understory and overstory). b. Consider managing shrub patches and leaving down logs to create corridors to allow movement between steppingstone patches such as unburned patches. c. Consider leaving untreated areas greater than 100 yards wide where shrubs can grow, and snags can naturally fall to create complex cover to support fisher movement and hiding.	This comment is outside the scope of the RMP/EIS. No change has been made. Species specific concerns would be addressed at the implementation level. If fishers are eventually listed, the BLM will consult with USFWS, and until that time we will manage as a sensitive species according to BLM policy.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	5. For long-term corridors and restoration of mature forest conditions: a. Consider reforestation and recovery to provide potential habitat in shorter timeframes by restoring and managing conifers and hardwoods to develop future structure and composition consistent with the natural range of variation. Provide additional planning direction for balancing recreation with connectivity conservation	This comment is outside the scope of the RMP/EIS. No change has been made. Species specific concerns would be addressed at the implementation level. If fishers are eventually listed, the BLM will consult with USFWS, and until that time we will manage as a sensitive species according to BLM policy.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	At present, most spatially explicit connectivity-related provisions are tied to the Essential Connectivity Corridors (Spencer et al., 2010). We recommend that additional planning direction should be developed to address species-specific connectivity needs, particularly for special status species with mapped corridors that overlay the NCIP decision area, such as Coastal Marten (see Slauson et al., 2019; Schrott & Shinn, 2020) and Pacific Fisher (see Spencer et al., 2016).	This comment is outside the scope of the RMP/EIS. No change has been made. The BLM prioritizes Essential Connectivity Corridors that would be addressed at the implementation level. Best management practices regarding habitat requirements of the Pacific Fisher are identified in Appendix F and are otherwise accounted for indirectly via the Forestry and Vegetation management sections. Habitat connectivity is addressed throughout the document and is identified as a criterion for land acquisitions.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Decommissioning or reducing access to BLM-managed roads that bisect seasonal movement corridors for big game or special status species and/or see traffic densities that may negatively affect wildlife movement.	BLM considered decommissioning roads that bisect Essential Connectivity Corridors on a case-by-case basis as outlined by BMPs in Appendix F.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Defining minimum wildlife-vehicle collision (mortality) and traffic volume (connectivity) thresholds that determine when the unit must consider wildlife mitigation measures.	These potential impacts on wildlife will be analyzed at the project-specific level and BMPs are included in Appendix F to address the concern.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Designing and building linear infrastructures (e.g., fences, roads, and transmission lines) in a manner that does not create unreasonable or unnecessary movement barriers or hazards for terrestrial and aquatic wildlife.	These potential impacts on wildlife will be analyzed at the project-specific level and BMPs are included in Appendix F to address the concern.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Designing new, replacement, and reconstructed stream crossing sites (i.e. bottomless culverts, bridges) to provide and maintain passage for fish, other aquatic species, and/or riparian-associated terrestrial species (although constructed barriers may need to be maintained in instances where native species benefit from physical isolation).	The Proposed RMP/Final EIS includes management direction for to provide for fish passage in Table B-1, Riparian Management Area Management Actions. If constructed barriers are proposed for specific fish management reasons, we would consider at the site-specific implementation level.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Developing or using an existing standardized methodology for reporting and collecting data on wildlife-vehicle collisions and wildlife carcasses along BLM roads.	The BLM would coordinate with CDFW on collision related issues at the implementation level.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Improve wildlife or aquatic habitat connectivity by removing unneeded structures (e.g., fences, roads, cattleguards, culverts, and spring developments) or completing improvement projects (e.g., remove barriers, restore dewatered stream segments, connect fragmented habitat, wildlife passage friendly fences, etc.) in at least 10 to 20 locations during each 10-year period following plan approval. Carson National Forest Plan (2022).	This comment is outside the scope of the RMP/EIS. No change has been made. Wildlife and aquatic connectivity best management practices and management direction would be coordinated at the project implementation level.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity. Inyo National Forest Plan (2019)	The RMP is consistent with officially approved or adopted resource-related plans, and the policies and procedures contained therein. Site specific analysis pertaining to road/trail interceptions or diversions to streams, meadows, wetlands, or other aquatic features and associated maintenance/restoration actions would be done at the implementation level following completion of the NCIP.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	New infrastructure or constructed features (e.g., fences, roads, recreation sites, facilities, drinkers, and culverts) should be designed and maintained to minimize negative impacts to the movement and dispersal of wildlife, fish, and rare plants. Infrastructure and constructed features already present that do negatively impact movement and dispersal should be modified or removed when no longer in use in order to improve connectivity. Barriers may be used to protect native species or prevent movement of nonnative species. Carson National Forest Plan (2022)	This comment is outside the scope of the RMP/EIS. No change has been made. The BLM prioritizes Essential Connectivity Corridors and would address this at the implementation level. Alternative B and Alternative D emphasize habitat connectivity and resilience.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	New or reconstructed fencing must allow for wildlife passage, except where specifically intended to exclude wildlife (e.g., elk exclosure fence) or to protect human health and safety. Carson National Forest Plan (2022)	This comment is outside the scope of the RMP/EIS. No change has been made. The BLM prioritizes Essential Connectivity Corridors and would address this at the implementation level. Alternative B and Alternative D emphasize habitat connectivity and resilience.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	To improve habitat connectivity, methods that accommodate wildlife (e.g., fencing, underpasses, overpasses, larger culverts) should be used when constructing or reconstructing highways or high-traffic volume Forest Service roads. Carson National Forest Plan (2022)	This comment is outside the scope of the RMP/EIS. No change has been made. The BLM prioritizes Essential Connectivity Corridors and would address this at the implementation level. Alternative B and Alternative D emphasize habitat connectivity and resilience.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Alternatives - wildlife	To maintain long-term population viability and herd distribution objectives, travel route re-alignment options should be considered in association with any new project proposal in order to create larger contiguous habitat blocks and security areas, ultimately reducing the amount of fragmentation. This guideline applies to big game production areas, migration corridors, severe and critical winter range, and winter concentration areas as mapped by Colorado Parks and Wildlife. Route re-alignment to create larger contiguous habitat blocks and security areas may increase the route density in some areas on edges of these mapped habitats, provided that habitat connectivity is maintained and the overall density of routes in the interior of these habitats is reduced. Grand Mesa Uncompahgre National Forest Draft Plan (2023)	This comment is outside the scope of the RMP/EIS. No change has been made. The BLM prioritizes Essential Connectivity Corridors and would address this at the implementation level. Alternative B and Alternative D emphasize habitat connectivity and resilience.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name:A landscape connectivity analysis for the Coastal Marten (Martes caurina humboldtensis) (Schrott and Shinn 2020) Description:This dataset was developed to inform and facilitate conservation planning for the Coastal Marten, a subspecies of the Pacific Marten, and it highlights several corridors that span NCIP decision area lands.The dataset includes a habitat connectivity model for the marten throughout its historical range. Spatial analysis tools, such as Linkage Mapper, were used to identify habitat "cores" (blocks of potentially suitable habitat likely to be large enough to sustain at least a small population) linked by "least-cost corridors" (relatively narrow swaths of land linking the cores that were expected to be the shortest route through the most easily traversed habitat).The goals of this dataset were to: (1) assess the relative isolation of the remaining marten populations (isolation from other populations being a risk factor for extirpation), (2) identify areas of potentially suitable but unoccupied habitat that could one day support marten populations, and (3) identify significant corridors that may facilitate dispersal by martens and warrant protection and/or habitat restoration. Source: <a href="https://www.fws.gov/project/landscape-connectivity-analysis-coastal-marten-martes-caurina-humboldtensis">https://www.fws.gov/project/landscape-connectivity-analysis-coastal-marten-martes-caurina-humboldtensis</a>	This dataset was reviewed and considered.The dataset utilized by the BLM (essential connectivity corridors of high biological value) in the NCIP for connectivity was broader and more inclusive than species-specific datasets, which works better for landscape level planning.The BLM will consider species-specific data sets in the future during project level planning.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: California Fish Passage Assessment Database Description:The Passage Assessment Database (PAD) is an ongoing inventory of known and potential barriers to anadromous fish in California. It compiles currently available fish passage information from more than two hundred data sources, and allows past and future barrier assessments to be standardized and stored in one place.The inventory is to be used to identify barriers suitable for removal or modification to restore spawning and riparian habitat for salmon and steelhead, and to enhance aquatic and riparian habitat. The PAD is intended to be compatible with a variety of other data sets related to anadromous fish issues. PAD records are saved with geographic location information. Each barrier record is indexed to the 24k high-resolution NHD allowing the user to combine the PAD with other fisheries data tied to the same hydrography. Source: <a href="https://map.dfg.ca.gov/metadata/DS0069.html">https://map.dfg.ca.gov/metadata/DS0069.html</a>	Thank you for bringing these datasets to our attention. The BLM prioritizes Essential Connectivity Corridors;Alternative B and Alternative D emphasize habitat connectivity and resilience.The BLM will incorporate this type of information into future project planning and implementation.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: Habitat Connectivity for Fishers & Martens in the Klamath Basin Region of CA & OR (Spencer et al. 2019) Description:This report identifies important landscape connectivity areas in the mid-Klamath Basin of northern California and southern Oregon for two imperiled forest species of conservation concern: Pacific marten (Martes caurina) and Pacific fisher (Pekania pennanti). It assesses current connectivity status and identifies where connectivity could be improved through restoration or other actions. Results for the current condition could serve as a baseline against which to compare potential future conditions due to the effects of land management, climate change, fire, or other factors. Conservation Biology Institute completed these analyses and report for the U.S. Fish and Wildlife Service. USFWS is currently working with Caltrans and the Karuk Tribe to monitor bridges and culverts for these species (Penrod, 2023). Source: <a href="https://consbio.org/reports/habitat-connectivity-for-fishers-martens-in-the-klamath-basin-region-of-ca-or/">https://consbio.org/reports/habitat-connectivity-for-fishers-martens-in-the-klamath-basin-region-of-ca-or/</a>	This dataset was reviewed and considered.The dataset utilized by the BLM (essential connectivity corridors of high biological value) in the NCIP for connectivity was broader and more inclusive than species-specific datasets, which works better for landscape level planning.The BLM will consider species-specific data sets in the future during project level planning.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: Omnidirectional Connectivity for Resilient Terrestrial Landscapes in the Pacific Northwest Description: Results were stratified by ecoregion and by geophysical setting ("land facets") to identify portions of land facets more likely to be resilient to climate change. The broad-scale landscape connectivity analysis reported here complements these previous analyses by identifying areas likely to facilitate ecological flow-particularly movement, dispersal, gene flow, and distributional range shifts for terrestrial plants and animals-over large distances and long time periods. Similar to the local permeability analyses (Buttrick et al. 2015), this analysis is not species-specific. Rather, it focuses on structural connectivity of natural lands, with resistance to movement modeled as a function of landscape naturalness. This analysis shifts the focus to identifying areas important for longer-distance movements - up to 50 km - complementing the local permeability analyses which identified areas well-connected within a 3-km radius. Source: <a href="https://databasin.org/datasets/a205a1c2fe5e499399f5f186bf6e6e50/">https://databasin.org/datasets/a205a1c2fe5e499399f5f186bf6e6e50/</a>	Thank you for bringing these datasets to our attention. The BLM prioritizes Essential Connectivity Corridors; Alternative B and Alternative D emphasize habitat connectivity and resilience. The BLM will incorporate this type of information into future project planning and implementation.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: Restoring California's Wildlife Connectivity 2022 (CDFW) Description: The California Wildlife Barriers reports (2020, 2022) identify a suite of priority wildlife movement barriers across the state-some of which are found in the NCIP planning area. Target species were identified for each of the priority barriers and included diverse species across multiple taxonomic groups. These include species, such as gray wolf, mountain lion, bobcat, badger, kit fox, and other meso-carnivores; ungulates such as bighorn sheep, elk, pronghorn, and mule deer; amphibians and reptiles such as California tiger salamander, arroyo toad, blunt-nosed leopard lizard, and western pond turtle; and imperiled invertebrates such as the Quino checkerspot butterfly. The 2022 report identifies 146 segments of linear infrastructure as wildlife barriers throughout California, 62 of which were identified as priority wildlife barriers and 12 that were included on the statewide top priority list. The 146 segments were evaluated based on criteria identified at the 2020 Northeastern California Connectivity Symposium (Penrod, 2020). Source: <a href="https://data-cdfw.opendata.arcgis.com/datasets/CDFW::wildlife-movement-barrier-priorities-cdfw-2022-ds3025/explore?location=37.225462%2C-119.773557%2C6.92">https://data-cdfw.opendata.arcgis.com/datasets/CDFW::wildlife-movement-barrier-priorities-cdfw-2022-ds3025/explore?location=37.225462%2C-119.773557%2C6.92</a>	Thank you for bringing these datasets to our attention. The BLM will coordinate with CDFW on any new or existing datasets, maps, or reports and will incorporate this information into future project planning and implementation.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: Schloss, et al. (2021, 2022). Connectivity for climate change adaptation in California [Dataset]. Description: This connectivity model is a structural, coarse filter approach that explicitly incorporates human modification as a factor that will limit movement for species moving in response to climate change as that has been shown to pose an additional threat to climate-driven movement. This approach also addresses the multiple scales at which suitable climates may drive species distributions by modeling connectivity between the broad shifts in coarsely-defined climate "space" along routes with finer-scale topoclimate diversity. Finally, it accounts for the longer timeframes and incremental movements necessary for multi-generational range shifts by incorporating the likelihood of climate-driven movement across microclimate stepping-stones. Source: <a href="https://doi.org/10.5061/dryad.d7wm37q1m">https://doi.org/10.5061/dryad.d7wm37q1m</a>	Thank you for bringing these datasets to our attention. The BLM prioritizes Essential Connectivity Corridors; Alternative B and Alternative D emphasize habitat connectivity and resilience. The BLM will incorporate this type of information into future project planning and implementation.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: Terrestrial Connectivity, Areas of Conservation Emphasis version 3.1 (CDFW 2019) Description: The Terrestrial Connectivity dataset is one of the four key components of CDFW's Areas of Conservation Emphasis (ACE) data visualization platform, along with Terrestrial Biodiversity, Significant Habitats, and Climate Resilience (CDFW 2019). CDFW compiled and synthesized the best-available spatial information in California on connectivity and wildlife movement into the Terrestrial Connectivity Dataset to better integrate biodiversity conservation with transportation and infrastructure planning. Other ACE datasets that may be applicable to the NCIP include SWAP Terrestrial Targets (CDFW 2015; BIOS dataset ds1966); Terrestrial Climate Vulnerable Species (BIOS dataset ds 2701); and Terrestrial Significant Habitats Summary (BIOS dataset ds 2721). Source: Map viewer available CDFW ACE 3 (ca.gov); BIOS dataset ds2734	Thank you for bringing these datasets to our attention. The BLM prioritizes Essential Connectivity Corridors; Alternative B and Alternative D emphasize habitat connectivity and resilience. The BLM will incorporate this type of information into future project planning and implementation.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Best available science and information	Feature name: Ungulate Migrations of the Western United States (Kauffman et al 2022) Description:The Ungulate Migrations of the West effort (Kauffman et al. 2020, 2022ab), a collaboration among federal scientists, university researchers, biologists and analysts from state and tribal agencies, is mapping migrations of mule deer, elk, and pronghorn in support of Secretarial Order 3362. There are a few ungulate migrations ( <a href="https://westernmigrations.net/">https://westernmigrations.net/</a> ) corridors for both elk and mule deer herds within the planning area. Source: Report and data <a href="https://pubs.usgs.gov/publication/sir20225088/full">https://pubs.usgs.gov/publication/sir20225088/full</a>	Thank you for bringing these datasets to our attention. The BLM prioritizes Essential Connectivity Corridors; Alternative B and Alternative D emphasize habitat connectivity and resilience. The BLM will incorporate this type of information into future project planning and implementation.
Wurtzebach	Zack	70	Center for Large Landscape Conservation	Consistency with other plans, laws, and regulations	CLLC believes the NCIP process is an important opportunity for the BLM to work with partners to advance policy goals found in the BLM Habitat Connectivity Instruction Memorandum, the proposed Public Lands Rule, and Secretarial Orders (i.e., No. 3353, 3356, 3362, 3366). Conserving connectivity at a truly landscape scale across multiple jurisdictions will require agencies, organizations, and individuals from across diverse sectors to work together. No single entity can do it alone. Cooperation and collaboration with other federal, state, and local agencies, tribes, non-governmental organizations, and industry stakeholders are needed to develop and implement robust, stakeholder-supported, science-based planning direction for habitat connectivity.	<p>Management common to all action alternatives includes consistency with existing Executive Orders, Secretarial Orders, laws and regulatory requirements. Alternative B emphasizes habitat connectivity and resilience while allowing appropriate development scenarios for resource uses (such as recreation, ROWs, livestock grazing, and mineral leasing).</p> <p>The BLM conducts land use planning in accordance with statutory requirements, regulations, and DOI and BLM policies and procedures. NEPA and the associated laws, regulations, and policies require the BLM to seek public involvement early in and throughout the planning process. This is to develop a reasonable range of alternatives to the proposed actions and to prepare environmental documents that disclose the potential impacts of proposed actions and alternatives.</p> <p>Cooperating agencies--those federal, state, and local agencies and Tribes that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative, pursuant to 40 CFR 1051.8 were consulted through the NEPA process. In January and February 2021, the BLM sent letters to 68 local, state, federal, and Tribal representatives, inviting them to participate as cooperating agencies. A total of 25 entities agreed to participate as a cooperating agency.</p>

Comments Received After Close of Comment Period

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Brown	Matt	L-1	U.S. Fish and Wildlife Service (USFWS) Red Bluff Fish and Wildlife Office	Alternative D (preferred alternative)	We agree with selection of Alternative D as the preferred alternative. Alternative D affords resource protections as good or better than the existing management of the No Action Alternative while preserving the opportunity for agency use of river materials for habitat improvements. River materials adjacent to the Sacramento River and its tributaries are critically important to restoring natural riverine process to our river and floodplain environments. Management Direction of the Preferred Alternative places a desirable emphasis on watershed and riparian restoration. Protections for restored riparian areas are bolstered with the exclusion of commercial mining activities in those areas where it could undo or destroy riparian restoration.	The BLM Interdisciplinary team has taken the recommendation into consideration. The Proposed RMP/Final EIS shows the final decisions related to Riparian Management Area Management Actions, Soil Resources, and Water Quality in Table B-1.
Brown	Matt	L-1	U.S. Fish and Wildlife Service (USFWS) Red Bluff Fish and Wildlife Office	Alternatives - fish and aquatic species	We encourage implementing screening and management of water diversions for features like the Paynes Creek Wetland Complex to comply with NOAA Fisheries guidelines and to also avoid adverse effects of water diversion on ESA listed salmonids, like those found in Paynes Creek.	We will comply with NOAA Fisheries guidelines as stated in Table B-1 under Management Direction for Water Resources.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Alternatives - special designations	Page 2-74; Row 118, Alternatives B-D The NPS recommends using "California National Historic Trail" "(e.g., instead of Yreka Historic Trail) for greater accuracy to capture both the Nobles Trail Route and Yreka Trail Route. Yreka is a route recommended suitable for inclusion in the California NHT as a whole, not as an NHT unto itself.	Revisions have been made to clarify management direction in the RMP/EIS The BLM has updated the language as it relates to the trail in Table B-1.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Alternatives - special designations	Page 2-180; Row 320 - and - Page 2-215 - and - Page 3-428 A 150-foot corridor width is inadequate for the protection of the NHT. Until such time that necessary inventory can determine the proper trail management corridor per BLM Manual 6280, a wider corridor is needed to ensure protection of the preservation values for which the California NHT was designated. 150 feet does not account for the scale at which NHTs are designated (a scale of 1:100,000 and based on historic documentation and maps) prior to necessary inventory for accurate trail location takes place. This is the responsibility of the federal land manager to determine. Standard practice in other planning documents provide at least a half mile to a mile buffer on either side of the existing congressionally designated centerline, for frame of reference.	The portions of the trails located on BLM managed lands have been inventoried. The 150-foot buffer is adequate for trail protection given its location in scattered public lands in an urban setting and along a still used fire egress road.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Alternatives - special designations	"Page 3-211; Last sentence of last paragraph of Alternative A  NHT designation is an act of Congress and not determined at the discretion of federal land managers. If this is intending to refer to designation as part of an ACEC, clearer language would read "Under Alternative A, no national historic trails would be designated as or included in additional ACECs."	Revisions have been made to clarify management direction in the RMP/EIS. The suggested language has been updated.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Best available science and information	Page 3-427; First sentence - and - References-25 This management plan was finalized in 1999. The bibliographical citation is: US Department of the Interior 1999 Final Environmental Impact Statement, Comprehensive Management and Use Plan for the Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails. National Park Service. "NSHT" may have been intended, but that is not an acronym provided in the document on viii or ix. The citation for the existing management and use plan for California NHT is: US Department of the Interior 1999 Final Environmental Impact Statement, Comprehensive Management and Use Plan for the Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails. National Park Service.	The "NSHT" acronym and definition (National Scenic and Historic Trails) has been added to the document.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Alternatives - special designations	B-58 A 150-foot corridor width is inadequate for the protection of the NHT. Until such time that necessary inventory can determine the proper trail management corridor per BLM Manual 6280, a wider corridor is needed to ensure protection of the preservation values for which the California NHT was designated. 150 feet does not account for the scale at which NHTs are designated (a scale of 1:100,000 and based on historic documentation and maps) prior to necessary inventory for accurate trail location takes place. This is the responsibility of the federal land manager to determine. Standard practice in other planning documents provide at least a half mile to a mile buffer on either side of the existing congressionally designated centerline, for frame of reference.	The portions of the trails located on BLM managed lands have been inventoried. The 150-foot buffer is adequate for trail's protection given its location in scattered public lands in an urban setting and along a still used fire egress road.

Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Vegetation	<p>Pages 3-73 to 3-77 (Affected Environment and Environmental Consequences - Vegetation: Special Status Plants)</p> <p>To elaborate on our prior comments, the NPS suggests that BLM begin collecting information and mapping CNPS List 3 species on their land. More information is needed on CNPS List 3 taxa to review their status. A list of these taxa known to occur or that potentially occur on BLM land should be incorporated into the Table 2-26/2-27 of the 2021 AMS. “BLM practices are intended to sustain and promote species that are legally protected and prevent those species that are not yet legally protected from needing such protection.” (pg. 2-97; Special Status Plants: Indicators). We also recommend that BLM collect data on CNPS list 4 species in areas outlined within its holdings as having some importance or elevated status. This is especially relevant to areas subject to substantial land use change, as these taxa are on a ‘watch list’. If substantial impacts are occurring to populations subject to land use alterations due to this plan, that information can and should be incorporated into further planning. Furthermore, should the status of these taxa become elevated, the agency will already have data on their locations and BLM will be able to provide input on any status changes to populations within its holding. Suggested areas where more intensive data collection of species should occur include: SRMA/ERMA, ROW permitting areas, wildfire management areas, grazing allotments, visual resource management areas (class3/4), areas open for mining operations of any kind, areas subjected to OHV traffic, and/or land subjected to tenure changes. Species should also be mapped within ACEC, Wilderness Areas, and Wild and Scenic Rivers because tracking and evaluating their biological resources will be crucial for management objectives in the future. Incorporating additional areas with unique vegetation types or soil types (decomposed granite and serpentine soils) is another consideration. Areas west of Whiskeytown National Recreation Area in the Grass Valley area of BLM are almost entirely decomposed granite and the geographic position of the habitat means it is likely to host a wealth of rare species. Constructing a list of these species would be useful to include in the EIS. Wording for these actions, both CNPS list 3 &amp; 4, should be incorporated into the NCIP in section Special Status Plants (pg. 3-73). Lastly, we recommend that BLM incorporate language that they will share any findings of special status plants with adjacent land managers. Should any rare taxa be found in areas adjacent to NPS land, it would be advantageous for such discoveries to be shared so we can understand taxa that might be encountered on NPS land.</p>	This comment is outside the scope of the RMP/EIS. No change has been made.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Wildlife	<p>Page 3-74 (Table 3-8) Recommendations: Add Fremontodendron decumbens (Found at border of Whiskeytown NRA and BLM land). Add Phacelia damnationensis (Found on Bohemotosh Mountain). Add Eriogonum ursinum var erubescens (Found on Bully Choop).</p>	The SEIS incorporates the best available science and information, including that contained in the 2017 Analysis of Management Situation and year 2023 geospatial data for listed plant species occurring on BLM-administered lands. New data and references suggested or provided by commenters were reviewed and included as appropriate.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Vegetation	<p>Page 3-74 (Table 3-8) Several taxa should be added to the AMS table 2-27 as being suspected of occurring on BLM land: Sedum rubiginosum, Calystegia stebbinsii, Trifolium pirokowskeii, and Malacothamnus astrotenticulatus</p>	This comment is outside the scope of the RMP/EIS. No change has been made.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Wildlife	<p>Page 3-112 ; Cumulative Impact The last sentence of this section states "Action alternatives that would promote active vegetation management to enhance ecosystem resiliency (Alternative C), may have greater contributions than other action alternatives (Alternatives B and D)." This point should be elaborated upon. It is unclear what defines ecosystem resiliency, why Alternative C is preferred, or how this conclusion was reached. All alternatives, particularly B, are meant to promote active management that restores historic disturbance regimes. Both Alternatives C and D would promote more erosion, invasive species encroachment, and pressure to utilize resources for economic gains as opposed to conservation, therefore they would be expected to reduce resiliency. The environmental analysis does not explain the preference for Alternative C is over Alternative D. If substantial evidence cannot be provided to suggest Alternative C may be preferred to enhance ecosystem resiliency, and what that means, such an assertion should be removed.</p>	Revisions have been made to the analysis in the RMP/EIS. The document has been updated to elaborate on the last sentence in this section.



Last Name	First Name	Letter #	Organization Name	Comment Code Name	Comment Text	BLM Response
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Alternatives - special designations	Map 2-14 ; Land Use Authorizations ; Alternative B The NPS recommends that the entire Grass Valley ACEC be considered as an exclusion area, and at minimum the Subunit I identified in alternative B, due to being an area with wilderness characteristics. Should the BLM consider Alternative D instead, the NPS recommends that an amendment be made to incorporate this specific exclusion area into the preferred alternative. This would further promote protection in the Grass Valley area that abuts the park’s border, promoting habitat preservation and reducing impacts to sensitive resources within both BLM and NPS borders.	The ROW avoidance designation, the VRM II designation (south of Hwy299), and the R&I values from the ACEC designation offer appropriate protections for the Grass Valley area.
Hoines	Josh	L-2	National Park Service (NPS) at Whiskeytown National Recreation Area (NRA)	Alternatives - visual resources	Map 2-4 to 2-7; Visual Resource Management ; All Alternatives Visual Resource Management in the South Fork Mountain area north of Whiskeytown NRA is slated for Class 4 (major modification to landscape) under all scenarios. Although this area is important for utility infrastructure, considerable habitat modification would drastically alter habitat and negatively impact sensitive resources. NPS recommends Class 3 is a preferred management strategy for this location and should any modifications occur, surveys should occur for sensitive species. Working in coordination with NPS in this area is important because of the overlap between utility operations and resource concerns on NPS land, including sensitive species and habitat impacts, invasive species introduction, and erosion issues.	The BLM standard is to classify communication sites as VRM IV. The area designated as VRM IV was keep to a minimum to encompass the existing communication site.

This page intentionally left blank.