

Western Section of The Wildlife Society  
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May 2, 2002

Mr. Brian Amme, Project Manager  
Bureau of Land Management  
P.O. Box 12000  
Reno, Nevada 89520-0006

Subject: The Western Section of The Wildlife Society Comments on the U.S. Bureau of Land Management's Vegetation Treatments Programmatic EIS for the Western United States

Dear Mr. Amme:

The Western Section of The Wildlife Society is writing to recommend potential issues to be addressed in the Programmatic Environmental Impact Statement (PEIS) for the Bureau of Land Management's (BLM) proposed program for vegetation treatments on BLM lands in the western U.S. Our comments and recommendations are based on review of the information contained in the 22 January, 2002, Federal Register notice announcing BLM's intent to prepare the PEIS under the National Environmental Policy Act (NEPA), information received during the public scoping process, and BLM's 1988 California Vegetation Management EIS to chemically treat 50,000 acres of land per year.

The Wildlife Society is a national organization comprised of professional wildlife biologists employed in the private and public sectors, natural resource management agencies and academia. The Western Section currently consists of about 1,000 members in nine chapters in California, Nevada, Hawaii, and the Pacific Islands. Western Section members include field biologists, wildlife managers, and policy makers from a broad range of disciplines who are regularly engaged in resolving land use and conservation issues stemming from impacts to wildlife and the habitats upon which they depend.

Our goal is to enhance the capability of wildlife professionals in conserving natural diversity, sustaining productivity, and ensuring responsible use of wildlife resources for society's benefit. The principal objectives of TWS include development and promotion of sound stewardship of wildlife resources and of the environments upon which wildlife and humans depend; taking an active role in preventing human-induced environmental degradation; increasing awareness and appreciation of wildlife values; and seeking the highest standards in all activities of the wildlife profession.

#### *Understanding of Proposed Program*

BLM owns 264 million acres in the U.S. of which 6 million acres per year would be treated

under this program. The program considered in the PEIS would be the vehicle for implementing federal fire management and post-fire emergency stabilization and rehabilitation mandates. Based on information solicited and received by the BLM from some California offices at least 80,000 acres per year would be treated (about half using fire) in California. Due to the relatively large BLM land base in Nevada, up to 64% of this state would be potentially affected by this program. As with any programmatic document, individual project Environmental Assessments (EA) would be prepared to evaluate project specific impacts and recommend specific mitigation measures while the PEIS would provide guidelines to evaluate treatments and Best Management Practices (BMP) proposed by local offices.

The focus of the PEIS will be to:

- Rehabilitate and restore areas damaged by wildfires (1.5 million acres)
- Reduce hazardous fuel loads to reduce risk of wildfires and removing trees on previously grazed lands that have converted to forests (3.5 million acres)
- Respond to 4-fold increase in weed populations in the last 15 years (25 million BLM acres are dominated by weeds)
- Enhance T&E species habitat and cultural resource areas
- Conduct Environmental Risk assessments for new EPA-approved herbicides (4-6 currently on market and new ones that may be approved).

The proposed program is intended to:

- reduce the proportion of chemical use by half relative to the current program
- double the use of prescribed fire (rural areas)
- double the use of mechanical treatment (urban areas where fire poses a threat to residences)

The PEIS will evaluate and compare 6 proposed treatments including manual (hand labor), mechanical (heavy equipment), biological (predatory insects and pathogens), cultural (grazing animals), chemical (herbicides), and prescribed burns (control size, area, timing, and intensity of burn). Land use areas such as grazing/timber leases and off-road vehicle areas will not be addressed in the PEIS.

### *Comments and Recommendations*

1. We assume the environmental review process for the proposed project described during scoping would include consultation with U.S. Fish and Wildlife Service (USFWS) as required under Section 7 of the federal Endangered Species Act (ESA). As a means of fostering additional protection for both federal and state listed species, we recommend the PEIS require consultation with local (state) fish and game or natural resource management departments. Depending upon the location of the project, this would include the local offices of the California Department of Fish and Game (CDFG) and Nevada Department of Wildlife

(NDOW). A local consultation requirement would ensure information relating to species occurrence, sensitive habitat areas, or designated conservation areas would be considered during development of local vegetation management plans.

2. The PEIS should contain clear policies relating to BLM's intent to conserve all non-target plant and animal species and local plans should address specific populations or areas for which special control measures to avoid impacts to wildlife are intended.

3. The PEIS should contain clear policies relating to BLM's intent to avoid impacts to plants and wildlife in isolated or seasonal wetlands, such as vernal pools and springs, which provide unique and often rare habitat features. In addition, local plans should clearly identify these areas and specify measures that result in complete avoidance of direct and indirect impacts.

4. The PEIS should contain clear policies relating to BLM's intent to avoid impacts to agricultural crops that, in some cases, provide habitat to declining or vulnerable wildlife species displaced by the continued loss and degradation of grasslands.

5. The PEIS should contain clear policies relating to BLM's intent to minimize erosion from treatment areas that could result in siltation and decreased water quality in wetlands. Water quality degradation could directly impact wildlife.

6. The PEIS should contain a complete and thorough discussion of the potential for cumulative impacts to wildlife and wildlife habitats resulting from vegetation control activities in the region. The cumulative effects analysis should consider both the long terms effects of conducting vegetation management activities under the proposed program, and how the entire proposed program could contribute to a cumulative impact when viewed with other public and private vegetation management efforts.

7. The PEIS should describe specific measures, common to all local programs, for minimizing dispersal of invasive and non-native vegetation. In some cases, non-native vegetation can successfully compete with, and ultimately reduce the quality and extent of, native vegetation resulting in impacts to wildlife depending on native species for food and cover. The PEIS should require development of BMP's, designed to minimize the dispersal of invasive weeds, as part of local plans, and require BLM employee and contractor compliance with these practices.

8. The PEIS should describe the BLM's policies on invasive plants or, in the absence of a policy, set forth BLM's position on managing invasive plants on BLM lands. The PEIS should require public education and outreach programs to increase awareness of invasive plant impacts on wildlife thereby reducing dispersal of invasives by members of the public and those leasing grazing lands.

9. The PEIS should analyze the on-going impacts to wildlife from Off Road Vehicle (ORV), grazing, and other land uses to establish a baseline from which project-specific, local impacts can be compared. Analysis methods should be clearly described and methods yielding results comparable to the PEIS land use analysis should be required in local project EA's.

10. The PEIS should require, in local plans, detailed revegetation plans designed to address competition and replacement of non-native species and for replacement with native vegetation following management treatments. These plans should include specific, measurable performance standards and criteria for evaluating revegetation success.

Revegetation efforts, required in both the PEIS and local project EA's, should include monitoring sufficient to conclude, with reasonable confidence, the success of revegetation.

11. The PEIS and subsequent local project environmental review should draw upon the best available science when establishing criteria, standards, methods, and policies for treatments and vegetation management activities. The PEIS and project EA's should focus, in particular, on existing studies (e.g. Lokern Grazing Study) that evaluate impacts of various treatments on invasive weeds to threatened and endangered species. Numerous studies have been done on the effectiveness and impacts of weed management techniques.

12. The BLM should make every effort to coordinate with the public, stakeholders, wildlife managers, and the scientific community on a local, regional, and watershed level. We suggest workshops as an appropriate and effective means of involving varied interests in the process of developing treatment regimes.

Thank you for considering these comments. Please contact me at 530-757-1403 or at the letterhead address to discuss our comments, answer questions related to our recommendations, or provide technical expertise as required.

Sincerely,

Barrett A. Garrison, Past-President  
Western Section of The Wildlife Society

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