

APPENDIX D – COMMENT RESPONSE

The Department of Energy – Idaho Operations Office made the draft EA available to the public for review and comment from September 16 to October 16, 2002. DOE-ID received ten comment documents during the comment period. The five comments from the public include: two comments suggesting that DOE choose the Maximum Fire Protection Approach (Alternative 1) as the preferred alternative, two comments providing suggestions on how to control fire on the INEEL, and one comment providing information relative to the number of fires on the INEEL over this individual’s 30-year employment at the Site. None of these comments required any changes to the environmental assessment. DOE thanks those individuals for their comments.

DOE-ID also received comments from the following federal and state agencies and conservation groups:

- September 20, 2002, Letter from Monte D. Wilson, Chair, **Citizens Advisory Board**, Idaho National Engineering and Environmental Laboratory, Idaho Falls, ID.
- October 9, 2002, Letter from Ms. Deb Mignogno, Supervisor, **U. S. Fish and Wildlife Service**, Eastern Idaho Field Office, Pocatello, ID.
- October 9, 2002, Letter from Robert J. Sabin, Regional Supervisor, **Idaho Department of Fish and Game**, Idaho Falls, ID.
- October 15, 2002, Email from Mr. Ken Thacker, Sagebrush Steppe Ecosystem Reserve Leader, **Bureau of Land Management**, Idaho Falls, ID.
- October 22, 2002, Letter from Trish Klahr, Chief Conservation Scientist, **Nature Conservancy**, Sun Valley, ID.

The following comments and responses are grouped by agency. In addition, where applicable the comment response identifies changes to the EA and their location. As stated earlier, the comments from the public did not require any changes to the EA.

Comments and Responses	
COMMENTS FROM THE CITIZENS ADVISORY BOARD (CAB)	
CAB COMMENT (1) DOE use Alternative 2, The Balanced Approach whenever possible.	RESPONSE: DOE has selected Alternative 2, the “Balanced Fire Protection Approach” as the preferred alternative in the Finding of No Significant Impacts. We did not change the EA as a result of this comment.
CAB COMMENT (2) DOE and BLM work together on pre-fire planning and fire suppression planning with the goal of using the same suppression approach and protection methods for the facilities.	RESPONSE: Section 1.3 describes the relationship of this EA to BLM’s EIS and the Sagebrush Steppe Ecosystem Reserve. DOE and BLM are coordinating efforts. That coordination lead to an initial decision to include the INEEL in the BLM EIS and identify it as a Category “B” Polygon meaning that wildland fire is not desired and aggressive fire suppression tactics would be employed. However, if DOE makes a decision based on this EA that would change the “B” polygon designation, DOE will work with BLM to revise the designation in their EIS. If the management plan and associated EA for the Sagebrush Steppe Ecosystem Reserve indicates the need for a wildland fire strategy that differs from an alternative selected based on this EA, that strategy would be incorporated into the INEEL’s wildland fire management. We did not change the EA as a result of this comment.
CAB COMMENT (3) DOE include the Wildland Fire Management Committee as part of all the alternatives.	RESPONSE: The purpose of the Wildland Fire Management Committee (WLFM Committee) is to provide recommendation to DOE for pre-fire and post-fire activities (see Section 2.1). Alternative 4 “Traditional Fire Protection Approach” is the no action alternative, and as such describes the current wildland fire management strategy, and does not include a WLFM Committee. Few pre- and post-fire activities under

	<p>Alternative 3 “Protect Infrastructure and Personnel Safety Approach” are closely associated with protection of facilities, and would likely not need a WLFM Committee to provide recommendations.</p> <p>We did not change the EA as a result of this comment.</p>
COMMENTS FROM THE U. S. FISH AND WILDLIFE SERVICE (FWS)	
<p>FWS COMMENT (1) DOE consider and discuss threatened and endangered species that occur or may occur on the INEEL, such as the gray wolf, bald eagle, and Ute ladies’-tresses and species of concern sage grouse, yellow-billed cuckoos, and pygmy rabbits.</p>	<p>RESPONSE: There have been no confirmed sightings of the gray wolf on the INEEL and we concluded that it was unlikely there would be negative impacts to this species. Bald eagles have been known to winter on and near the INEEL. We have no records indicating that they nest on the INEEL, and believe that nesting habitat for this species does not exist on the INEEL. Wintering bald eagles can be found on the INEEL perched on power line poles but are mainly found along the northwest boundary of the INEEL in the vicinity of Howe. While in this area, the eagles are foraging primarily on agricultural fields in that area. Foraging perches on the INEEL in that vicinity are limited to power line poles. Protection of those poles is discussed elsewhere in this document. There has been speculation that the Spreading Areas near RWMC could be an important wintering area when the Big Lost River is flowing and the Spreading Areas contain enough water to attract ducks. It is unlikely that summertime fires or fire fighting would have any impact on this potential resource.</p> <p>Ute ladies tresses is listed for Bonneville and Jefferson counties. The areas of the INEEL that occur in these two counties are almost entirely sagebrush steppe. It is highly unlikely that suitable habitat for this species exists in those areas and impact to this species or its habitat due to wildland fire or fire fighting is unlikely.</p> <p>The yellow-billed cuckoo requires large blocks of riparian habitat. Riparian habitat on the INEEL is restricted to a narrow band along the Big Lost River. None of this habitat could be described as the kind of riparian woodland necessary for yellow-billed cuckoo habitat. It is unlikely that wildland fire or fire fighting would have impacts to this species or its habitat.</p> <p>Potential impacts to sage grouse and pygmy rabbits and their habitats were addressed along with all other sagebrush obligate species. The need to maintain large expanses of unfragmented sagebrush steppe, required for many of the INEEL “species of concern,” was the focus for much of the discussion of the environmental consequences to wildlife/habitat resources in this document.</p> <p>We did not change the EA as a result of this comment.</p>
<p>FWS COMMENT (2) DOE limit the use foam and fire retardants as fire suppression activities to prevent potential long-term impacts to ecological resources.</p>	<p>RESPONSE: In this document we discussed the science regarding the known effects of fire retardants on sagebrush steppe vegetation. As reported, there appear to be no short-term effects to sagebrush communities. We did not find any documentation concerning the long-term effects of fire retardants in sagebrush steppe and, therefore, the potential long-term impacts of their use cannot be estimated. However, the alternatives to using fire retardants do have well recognized long-term impacts. These alternatives include increased loss of sagebrush habitat due directly to fires and the impacts of creating containment lines around those larger fires as described elsewhere in this document. See Section 4 of the EA and Table 4.2.</p> <p>We did not change the EA as a result of this comment.</p>
<p>FWS COMMENT (3) DOE keep cultural and historical resource impacts as low as possible.</p>	<p>RESPONSE: The EA states that the cultural resource management goal is to reduce or eliminate impacts to cultural resources from INEEL activities, including wildland fires (see Section 1.4.5). DOE is recommending Alternative 2, the “Balanced Fire Protection Approach” as the preferred alternative in the Finding of No Significant Impacts. The analysis in the EA indicates that Alternative 2 meets the cultural resource management objectives (see Table 4-2).</p> <p>We did not change the EA as a result of this comment.</p>
COMMENTS FROM IDAHO DEPARTMENT OF FISH AND GAME (IDFG)	
<p>IDFG COMMENT (1) soil disturbing activities like road</p>	<p>RESPONSE: In Section 4.1.3 of this EA, we discuss the increased probability of weed invasion associated with Fuel Management Zones, Upgrading Unimproved Roads,</p>

<p>widening should be avoided. The IDFG is concerned...that cheatgrass and other undesired plant species will become established in the disturbed soils along these roads. The invasive species are usually highly fire prone and could lead to more frequent wildfire.</p>	<p>Defensible Space and Fire Suppression Activities. Although we did discuss the relationship between cheatgrass invasion and increased fire frequency elsewhere in this document (Section 3.4 and Appendix A), we did not make the direct connection in the Environmental Consequences section between the invasion of annual weeds associated with Fuel Management Zones, Defensible Space and Fire Suppression Activities, and the increased likelihood of ignition and the potential for increased fire frequency. The long-term potential for increased fire frequency, higher risk of ignition, and potential for more and larger fires associated with these soil-disturbing activities has been considered.</p> <p>We did not change the EA as a result of this comment.</p>
<p>IDFG COMMENTS (2) greenstripping only be considered around buildings and other facilities.</p>	<p>RESPONSE: We have removed references to greenstripping from the EA.</p>
<p>IDFG COMMENTS (3) post-fire activities not include the burning out of sagebrush steppe areas. Intact sagebrush steppe should be left in place.</p>	<p>RESPONSE: Burning sagebrush within the fire perimeter would only be done to when necessary to improve the effectiveness of a containment line. The practice is not included in any alternative as a post-fire activity (see Section 2.1.2).</p> <p>We did not change the EA as a result of this comment.</p>
<p>IDFG COMMENTS (4) recommended that burned areas should at least be seeded with sagebrush to decrease the timeframe for sagebrush to re-colonize the area.</p>	<p>RESPONSE: The Department understands and agrees with the need to decrease the timeframe for sagebrush reestablishment after a wildland fire. Options to reduce that timeframe include aerial seeding, various ground drill planting techniques of seeds, and planting of seedlings. The first two options have been repeatedly tried in various areas of the west, including on the INEEL. To date, reestablishment by those techniques has not proven successful. Aerial seeding versus natural recovery is being studied on the INEEL under a long-term research project. DOE will continue to assess new data regarding the reestablishment of sagebrush and prefers to keep the recovery options open on whether the INEEL uses planting seedlings, developing specialized drills for seed planting, special timing of aerial seeding or a new technology yet to be developed. DOE will evaluate the latest data available when deciding what method to use for future restoration activities.</p> <p>We did not change the EA as a result of this comment.</p>
<p>COMMENTS FROM THE BUREAU OF LAND MANGEMENT (BLM)</p>	
<p>BLM COMMENT (1) that the EA does not adequately reflect potential impact and threat to sagebrush habitat from the invasion of weeds, especially cheatgrass following pre-fire and suppression activities.</p>	<p>RESPONSE: See response to IDFG Comment (1).</p> <p>We did not change the EA as a result of this comment.</p>
<p>BLM COMMENT (2) providing the acres disturbed by fuel management and upgrading unimproved roads for each alternative.</p>	<p>RESPONSE: We concur and have added the number of acres disturbed by fuel management and upgrading unimproved roads for each alternative (see Table 2-1).</p>
<p>BLM COMMENT (3) revising the values in the Evaluation Matrix (Table 4-2) related to “Maintain plant genetic diversity” and “Prevent invasion of non-native species including noxious weeds.”</p>	<p>RESPONSE: We concur and have revised the values to those natural resource objectives (see Table 4-2).</p>
<p>COMMENTS FROM THE NATURE CONSERVANCY (NC)</p>	
<p>NC COMMENT (1) adding as a management objective to prevent and/or minimize the introduction of fuels onto the INEEL specifically referring to cheatgrass invasion resulting from soil disturbance.</p>	<p>RESPONSE: We agree that preventing the invasion by cheatgrass is critical to any wildland fire management plan for sagebrush steppe and that soil disturbance is the primary risk factor for cheatgrass invasion on the INEEL. We also agree that achieving many, if not most, of the Management Objectives (1.4.2 through 1.4.5) can be met through minimizing soil disturbance and that is reflected in the discussions of environmental consequences in Section 4. Although we recognize it as an important method for achieving our management objectives, we did not consider it a purpose or target that we hope to achieve with our management.</p>

	We did not change the EA as a result of this comment.
NC COMMENT (2) that the EA provide further justification for “Unimproved Road Upgrade” action in Alternative 2.	<p>RESPONSE: The criterion for upgrading unimproved roads is to make them passable by 4x4 equipment in part, to improve fire fighting access and response times. The primary impediment to 4x4 travel on two-track roads is deep rutting. Upgrading will be primarily limited to filling these ruts with gravel. No soil disturbance will be allowed in this process without further environmental review.</p> <p>We added a note a note to the EA clarifying upgrading unimproved roads (See Table 2-1, Pre-Fire Actions, Alternative 2, Unimproved Road Upgrades and Section 2.1.1, Road Improvements).</p>
NC COMMENT (3) the EA identify “Natural Burn Areas” where naturally occurring wildland fires could burn without soil-disturbing interference.	<p>RESPONSE: We have chosen not to specify any let-burn areas except as a default condition for Alternative 3 where there is no objective to contain any fire and only facilities would be protected. Guidelines for sage grouse management recommend protecting all sagebrush from fire. There are distinct trade-offs between aggressively fighting fire to limit the amount of sagebrush habitat lost and increasing the likelihood of weed invasions due to soil disturbance associated with constructing containment lines. The most important need is to develop a post-fire rehabilitation plan that focuses on preventing weed invasion. Since 1994, almost one-third of the sagebrush habitat on the INEEL has been lost to fire. At this time, protecting the remaining sagebrush habitat is now of great importance.</p> <p>We did not change the EA as a result of this comment.</p>
NC COMMENT (4) clarifying the term “unwanted wildland fire.” A better term might be “human-caused wildland fires” as opposed to “naturally ignited wildfires.”	<p>RESPONSE: We chose to use the term unwanted to describe fires that are not burning according to a prescription regardless of the ignition source.</p> <p>We did not change the EA as a result of this comment.</p>