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M  
Natural Resources  
Defense Council

25 Kearny Street  
San Francisco, CA 94108  
415 421-6561

March 26, 1986

John Matthiessen, Area Manager  
Bureau of Land Management  
1050 E. William St., Suite 335  
Carson City, NV 89701

Re: Buckeye AMP

Dear Mr. Matthiessen:

I am writing on behalf of the Natural Resources Defense Council (NRDC) to express our serious concerns regarding the draft Buckeye Allotment Management Plan (AMP). The draft AMP proposes to increase livestock grazing significantly, even though: (1) range condition is poor and declining throughout the area; (2) the BLM apparently lacks monitoring data to support such increases; and (3) such increases were not analyzed in the Reno EIS. Furthermore, the proposed actions will clearly not meet the wildlife objectives for the area, which are to improve mule deer habitat and to protect and improve riparian areas. Finally, the draft AMP would allow the permittee excessive flexibility. For these reasons, the AMP should be significantly revised.

As revealed in the Reno EIS and draft AMP, range condition is poor in 82 percent of the area, and the trend is downward throughout the area. Under the circumstances, it is apparent that increasing livestock grazing substantially is not the way to achieve the BLM's objectives for the area: namely, to improve range conditions and reverse downward trend. While the removal of wild horses might otherwise result in improved range conditions, the substantial addition of livestock will apparently negate any such improvement. Nor are we persuaded that the proposed livestock grazing system alone will measurably improve range conditions, particularly given the large increases in livestock numbers. In any case, neither the AMP nor the EIS adequately explains how the grazing system is likely to be sufficient to achieve objectives for the area.

We strenuously object to the implementation of any livestock increases in the absence of monitoring data that show that sufficient forage is available. In the pending court action, BLM staff have consistently argued that, under current agency policy, no adjustments in grazing use can be implemented without

sufficient monitoring data (i.e., trend, utilization, actual use, and climate) regarding use by livestock, wildlife, and wild horses. Are such data available for the Buckeye Allotment? If so, what is the carrying capacity of the allotment? (As noted by Judge Burns in his ruling on the Reno EIS and MFP, "the BLM is required to determine grazing capacity at the time it issues grazing permits and prepares Allotment Management Plans.") If not, what is the agency's scientific and policy basis for implementing large increases in livestock use?

Third, we note that the proposed livestock increases were not analyzed in the Reno EIS. In fact, the Reno EIS apparently contains erroneous information: according to the draft EIS (p. 1-2), the last three years average use in the allotment was 4550 AUMs, whereas the draft AMP states that, since 1981, average licensed use has been 2962 AUMs and average actual use has been 1981 AUMs. The draft AMP proposes to increase licensed use to approximately 3956 AUMs, and aims to increase use within ten years up to 4000-4500 AUMs. However, the environmental consequences of allowing grazing use to increase by approximately 2000 AUMs over recent actual use, or 1000 AUMs over licensed use, has never been analyzed. Moreover, the accuracy of the Reno EIS now appears to be questionable.

We also note that the Bureau's failure to propose any steps to improve wildlife and riparian habitat is inconsistent with the agency's objectives for the area. As noted in the draft AMP, overall mule deer forage quality and quantity is poor, and habitat is being "severely impacted" due to excessive forage utilization. Yet, despite the fact that the Bureau's objectives are to improve wildlife and riparian habitat in the area and to "provide an increase in deer AUMs" (Rangeland Program Summary, Table II), the AMP fails to propose any steps that would measurably approach these objectives. As noted by Sam Millazzo of the Nevada Department of Wildlife in his letter to you dated February 21, 1986, "this document proposes little resolution to the existing conflicts on the Buckeye Allotment."

Finally, we are concerned about the "flexibility" that would be allowed the permittee under the AMP. The AMP would allow the operator to increase sheep numbers by 5 percent, or by 175 sheep (5% of 3500), and to expand the season-of-use by 15 days. This amounts to a substantial AUM increase on top of the major increases already proposed. Moreover, FLPMA requires that AMPs "prescribe" how grazing will be managed in an allotment. As noted by Judge Ramirez in his ruling overturning the Bureau's attempt to weaken the requirements of AMPs, this requirement "indicates Congressional intent that seasons, numbers, and cancellation provisions be specified in all permits, including those containing AMPs." NRDC v. Hodel, 618 F. Supp. 848, 875 n. 49 (E.D. Cal. 1985). Allowing the permittee discretion to

increase numbers and seasons beyond those specified in the AMP is inconsistent with this mandate.

In sum, the draft Buckeye AMP is patently inadequate. It fails to comply with Bureau policy or to meet the agency's own objectives for the area. Moreover, it raises new doubts about the accuracy and adequacy of the Reno EIS. For these reasons, we urge you to revise the AMP substantially.

Thank you for considering our views. Please keep me informed of any further proposals or decisions in the area.

Sincerely,

  
David B. Edelson

DBE:hw

cc: Rose Strickland ✓



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT CARSON CITY DISTRICT OFFICE

1050 E. William St., Suite 335  
Carson City, Nevada 89701

IN REPLY REFER TO:

4130  
(NV-037)

AUG 23 1985

Ms. Dawn Lappin  
Wild Horse Organized Assistance  
P.O. Box 555  
Reno, Nevada 89505

Dear Ms. Lappin:

An Allotment Management Plan is being developed for the Buckeye and Pinenut Allotments. Boundaries of the areas covered by the plans are generally the crest of the Pinenut Mountains on the east and south sides and Carson Valley and Carson River on the west and north sides, respectively. Buckeye Allotment contains approximately 87,000 acres of public land on which Buckeye Ranch has grazing preference for sheep. Pinenut Allotment contains approximately 19,000 acres of public land on which Borda Brothers have grazing preference for sheep.

Livestock grazing plans can be implemented in both allotments without any additional range improvement projects. An important component of the grazing plans is that all portions of each allotment will be rested from livestock grazing in at least 2 of each 6 years. Following implementation of the plans, the allotments will be monitored through one grazing cycle at which time the plans will be carefully evaluated.

Comments concerning proposed livestock grazing practices in both allotments are welcome through September 20, 1985.

If you are interested in more specific basic data for either allotment, the information will be sent to you upon request.

Sincerely yours,

John Matthiessen  
Area Manager  
Walker Resource Area