

8/12-82

# W H O A !

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## WILD HORSE ORGANIZED ASSISTANCE INC.

A Foundation for the Welfare of  
Wild Free-Roaming Horses and Burros

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August 12, 1982

Mr. Merrill DeSpain, District Manager  
Bureau of Land Management  
SR 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

First of all, welcome the Ely District. I apologize I was unable to attend your introduction. I wish you the best of luck and hope that WHOA can help provide you some guidance on wild horses and the public's concerns in their regards, as well as several other issues we are deeply comitted in preserving.

Thank you for the opportunity to comment on the EIS for the Schell Resource Area Wilderness study. I am unable to support any alternative but the 'all wilderness' simply because of the limited wilderness proposed in the other alternatives. It appears to me, having quite a bit of knowledge of the area, that somewhere between 'all wilderness' and the 'MFP II wilderness' is a happier medium, but since it was not presented; I have no other choice. Knowing full well that boundaries can be adjusted to mitigate the conflicts, we propose you reconsider.

I have traveled extensively in your District, my ancestors having been born and raised in Ely, Ruth; some of the areas mentioned are more traveled than others, but deserve protection. Please be reminded that wild horse management and wilderness are completely compatable and steps should be taken during this process to assure the management tools necessary, should the areas be designated by Congress, include these tools.

Thank you for your consideration.

Most sincerely,


Dawn Y. Lappin (Mrs.)  
Director



FINAL  
ENVIRONMENTAL IMPACT STATEMENT  
PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM  
for the  
SCHELL RESOURCE AREA  
Nevada

Prepared by

DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ELY DISTRICT



State Director  
Nevada State Office

The Bureau of Land Management proposes to implement a livestock grazing management program for the Schell Resource Area of the Ely District in east-central Nevada. This program proposes to manage forage for livestock, wildlife and wild horses; establish sustained yield levels of forage utilization within three years based on a vegetation monitoring program; determine range developments to improve forage and the management of the forage resource; outline a general implementation schedule; and list the standard procedures for operation with the major goal of solving 5 major resource problems. Four alternatives are considered along with the Proposed Action. They are: Resource Protection, Graze at Preference, No Livestock Grazing, and No Action. A discussion of the affected environment is briefly summarized and the environmental consequences occurring from the Proposed Action and each alternative are documented in the EIS.

For Further Information Write Merrill DeSpain, District Manager  
Star Route 5, Box 1, Ely, Nevada 89301  
or call 702-289-4865

Date final statement was made available to the  
Environmental Protection Agency and the public

OCT 8 1982

# SUMMARY

## ALTERNATIVES, INCLUDING THE PROPOSED ACTION

The Bureau of Land Management (BLM) proposes to implement a livestock grazing management program in the Schell Resource Area (RA) of the Ely District, Nevada. The Schell RA encompasses 4,240,000 ac of public land in east central Nevada (see Location Map). About 119,000 ac of private land are intermingled throughout the area. The Humboldt National Forest, Lehman Caves National Monument, and the Goshute Indian Reservation all have lands within, or adjacent to, the Schell RA, accounting for another 1,642,000 ac.

Analyzed in this environmental impact statement (EIS) are the Proposed Action and four alternatives: Resource Protection, Graze at Preference, No Livestock Grazing, and No Action. Chapter 1 discusses the alternatives, including the Proposed Action. Major differences between alternatives revolve around allocation of forage. Management Framework Plan Step 3 (MFP-3) decisions will be made in 1983 on the grazing management program to be implemented. The actual schedule of implementation will not be known until that time. Final decisions will be based on the Area Manager's recommendations, this EIS, monitoring data, and inputs from Coordinated Resource Management and Planning (CRMP). The Proposed Action starts with present use (the 1977-1979 three year average) or 136,669 AUMs. Adjustments to this level of use may be made with the MFP-3 decision to assure that individual permittees are not significantly economically impacted. Livestock and wild horse adjustments would be made in 3 years when monitoring data would be available to manage forage utilization at sustained yield levels. For analysis purposes in this and the other alternatives, reductions in livestock and wild horse use of 10 percent were assumed to be required in 35 allotments with a present utilization problem. In the short term, increases in use are allowed due to range management actions (seedings, water development, AMPs, grazing systems) that would potentially increase available forage (Summary Figure 1). By the end of the short term, livestock use would be about 138,006 AUMs, 101 percent of present use. Slight increases would occur in the long term due to additional management actions in that in the long term use would be about 104 percent of present.

The Resource Protection alternative would initially reduce present use by 22,156 AUMs (16 percent) which would be allocated to wildlife. Intensive range management actions would increase livestock and wild horse use slightly in the remainder of the short term, but would remain below present levels. In the long term, wild horse and livestock use is expected to increase from short term levels, but still not back to present use. Wildlife use would remain at short term levels.

The Graze at Preference alternative would initially license livestock use at active preference, a 92 percent increase over present use, and remove all wild horses. For analysis purposes, it has been assumed that this would cause severe overgrazing on most allotments, resulting

in significant reductions in use within 3 years when monitoring data becomes available. Range management actions, primarily 3-5 years of total rest from livestock grazing, would be required to return most of the area to usable status. In the long term, livestock use would still be nearly 50 percent lower than present use on most allotments.

The No Grazing alternative analyzes the effects of complete removal of livestock grazing, which would provide additional forage for wildlife and wild horses.

The No Action alternative assumes livestock, wildlife, and wild horse use would remain the same as at present in the short and long terms.

The present condition of the affected resource area is discussed in Chapter 2. The environmental impacts of the alternatives, including the proposed action, are discussed in Chapter 3 and are summarized in Summary Table 1. This table outlines by discipline the significant adverse impacts (SAI) and significant beneficial impacts (SBI) of each alternative and provides a basis for public review and for making a choice among options.

During scoping for this EIS, and during the MFP conflict analysis, 5 major resource problems that are occurring in the Schell RA were noted. Objectives were devised to help solve the problems. The problems and objectives are:

1. Problem: Improper utilization of the vegetation resource occurring on portions of the Schell RA.

Objective: Manage the vegetation resource and its uses to attain utilization rates not to exceed those recommended by the Nevada Rangeland Monitoring Task Force for sustained yield (45 percent for shrubs, 55 percent for grasses and forbs).

2. Problem: A decline in historic wildlife numbers and crucial habitat that is unprotected.

Objective: Attain and maintain habitat for reasonable numbers of wildlife, reestablish bighorn, pronghorn antelope, and elk on historic ranges, and protect crucial wildlife habitat.

3. Problem: Less than good condition of many riparian and wetland areas.

Objective: Upgrade and maintain all riparian and wetland areas in good or better condition.

4. Problem: A decline in livestock use in the Schell RA from historic authorized grazing use levels (active preference).

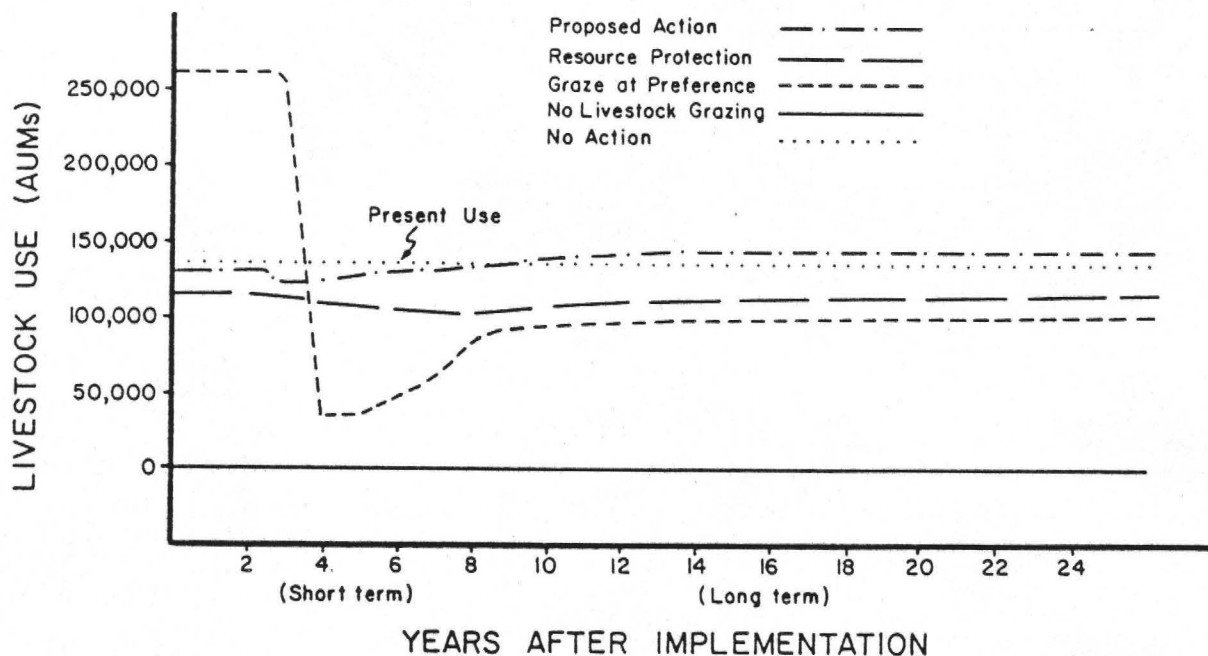
Objective: Maximize livestock based on sustained yield of the forage resource.

5. Problem: Reduction of wild horse numbers below potential population levels.

Objective: Maximize wild horse numbers based on sustained yield of the forage resource.

The No Action and Graze at Preference alternatives meet none of the objectives. The Resource Protection alternative meets 3 of the

Summary Figure 1. Graphic display of changes in livestock use due to implementation of alternatives for the Schell Resource Area grazing management program.



objectives completely, improper utilization, reasonable numbers of wildlife and protection of riparian-wetland areas. The No Grazing alternative meets problems 1, 2, 3, and 5 totally (improper utilization, wildlife, riparian-wetlands, wild horses). The Proposed Action meets problem 1 (improper utilization) completely, and partially meets objectives to problems 2, 3, 4, and 5 (wildlife, riparian-wetlands, livestock, and wild horses, respectively).

## SCOPING COMMENTS

Scoping meetings were held in April 1981 in Pioche, Ely, Baker, and Reno, Nevada, to elicit public opinion concerning the Proposed Action and alternatives. Numerous additional contacts were made before and after the scoping meetings with various interested federal, state, and local agencies and other interest groups. Five major areas of concern or controversy dominated the comments. Environmental groups were concerned that the Schell RA was presently being overutilized by livestock and wild horses and that continuing existing use would not solve the problem. They suggested making initial forage allocations based on the 1978-79 range survey forage production data, rather than initially licensing at present livestock use and then monitoring to determine changes. A one point in time survey was not felt to be adequate to determine forage

production. Therefore, only the apparent trend data and vegetation typing information from the 1978-79 range inventory were used in the EIS. These groups, and others, were also concerned that inadequate forage and habitat for wildlife were contributing to low wildlife numbers. This concern was especially noted for riparian and wetland areas, often extremely important for wildlife and ecosystem diversity. The ranching community was concerned that BLM was attempting to decrease the level of livestock use, a use that in many cases is several generations old in the Schell RA. Wild horse groups were concerned that wild horse management centered on horse removal, rather than positive management.

Several people did not believe that BLM would be able to fund and carry out an extensive monitoring program, judging from past performance. Another federal agency questioned the format of the No Action alternative. Many of the comments concerned the manner in which vegetation allocation was to be handled in the EIS and centered on BLM administrative decisions rather than impacts to be analyzed in the EIS.

Other alternatives that were considered for this EIS but were dropped because they were neither reasonable nor feasible in light of BLM's multiple use objectives included: maximize wild horses, maximize wildlife, maximize livestock, and a 40 to 50 percent reduction in livestock.



Summary Table 1. Grazing Impact Summary for the Schell Resource Area.

Environmental Elements	Proposed Action	Resource Protection	Graze at Preference	No Livestock Grazing	No Action
Water Quality	<p><u>Short Term</u> No significant change over present levels.</p> <p><u>Long Term</u> No significant change over present levels.</p>	<p><u>Short Term</u> Water quality would improve due to fencing and reduced livestock levels, but not significantly.</p> <p><u>Long Term</u> Water quality would continue to improve.</p>	<p><u>Short Term</u> Water quality would decline in most springs and streams due to increased numbers of livestock.</p> <p><u>Long Term</u> Water quality would probably improve to near present levels.</p>	<p><u>Short and Long Term</u> Water quality would improve, but not significantly, due to decreased livestock use.</p>	<p><u>Short and Long Term</u> No change over present levels.</p>
Soils (erosion)	<p><u>Short Term</u> Improvement in erosion in at least 23 percent of Schell RA due to sustained yield utilization - SBI.<sup>a</sup></p> <p><u>Long Term</u> Continued improvement - SBI.</p>	<p><u>Short Term</u> Improvement in erosion in majority of the Schell RA due to sustained yield utilization and decreased livestock use - SBI.</p> <p><u>Long Term</u> Continued improvement - SBI.</p>	<p><u>Short Term</u> Increased erosion in over 50 percent of the Schell RA due to increased livestock use - SAI.<sup>b</sup></p> <p><u>Long Term</u> Continued greater erosion than at present in over 50 percent of Schell RA - SAI.</p>	<p><u>Short and Long Term</u> Improvement in erosion in all of Schell RA except potentially in a few areas of wild horse concentration - SBI.</p>	<p><u>Short Term</u> No change over present.</p> <p><u>Long Term</u> Increased erosion in 23 percent of Schell RA in downward trend - SAI.</p>
Vegetation Livestock Condition and Apparent Trend	<p><u>Short Term</u> Improvement in at least 23 percent of Schell RA in a downward trend due to sustained yield utilization - SBI.</p> <p><u>Long Term</u> Continued improvement - SBI.</p>	<p><u>Short Term</u> Improvement in majority of Schell RA due to decreased livestock use and sustained yield utilization - SBI.</p> <p><u>Long Term</u> Continued improvement - SBI.</p>	<p><u>Short Term</u> Decline in over 50 percent of Schell RA due to increased livestock use - SAI.</p> <p><u>Long Term</u> Gradual improvement in most areas but still lower than at present - SAI.</p>	<p><u>Short and Long Term</u> Improvement in the entire Schell RA due to removal of livestock - SBI.</p>	<p><u>Short Term</u> Little change over present.</p> <p><u>Long Term</u> Decline in 23 percent of Schell RA presently in a downward trend - SAI.</p>
Riparian and Wetland Areas	<p><u>Short Term</u> Improvement in about 250 ac of riparian habitat due to fencing.</p> <p><u>Long Term</u> Additional improvement but the area is not quantifiable.</p>	<p><u>Short Term</u> Improvement in 750 ac of riparian and 11,700 ac of wetland habitat due to fencing or other improvement - SBI.</p> <p><u>Long Term</u> Additional improvement but the area is not quantifiable.</p>	<p><u>Short Term</u> Decline in all riparian and wetland areas due to increased livestock use - SAI.</p> <p><u>Long Term</u> No, or very little, improvement from short term - SAI.</p>	<p><u>Short and Long Term</u> Improvement in all riparian and wetland areas due to removal of livestock - SBI.</p>	<p><u>Short and Long Term</u> No change over present.</p>
Poisonous Plants and Sensitive Plants	<p><u>Short and Long Term</u> No significant impacts.</p>	<p><u>Short and Long Term</u> No significant impacts.</p>	<p><u>Short Term</u> Potential for increased poisonous plants and destruction of some sensitive plants by heavy grazing - SAI.</p>	<p><u>Short and Long Term</u> No significant impacts.</p>	<p><u>Short and Long Term</u> No significant impacts.</p>
Livestock Grazing	<p><u>Short Term</u> Increase in livestock use of about 1 percent over present use.</p> <p><u>Long Term</u> Increase in livestock use about 1 percent above short term use.</p>	<p><u>Short Term</u> Decrease in livestock use of about 11 percent due to reserving forage for wildlife and reductions to achieve sustained yield - SAI.</p> <p><u>Long Term</u> Additional AUMs (3,596) would accrue due to intensive management actions, increasing livestock use to less than 10 percent below present use.</p>	<p><u>Short Term</u> Livestock use would decrease 31 percent from present levels due to overutilization during the first 3 years - SAI.</p> <p><u>Long Term</u> Livestock use would increase but still be more than 10 percent below present levels - SAI.</p>	<p><u>Short and Long Term</u> All livestock would be removed from public lands, decreasing present livestock production by 136,669 AUMs - SAI.</p>	<p><u>Short and Long Term</u> Livestock numbers would remain at present levels, although some minor reductions would be expected in the long term.</p>

Summary Table 1. Continued

Environmental Elements	Proposed Action	Resource Protection	Graze at Preference	No Livestock Grazing	No Action
Wildlife Big Game	Short Term Slight improvement in big game habitat condition and increases in population levels due to sustained yield utilization.	Short Term Habitat and forage for reasonable number of all big game would be reserved and overall habitat condition would improve - SBI.	Short Term Forage and habitat condition for big game would decrease due to overutilization by livestock - SAI.	Short and Long Term Big game would be able to expand throughout the Schell RA due to the removal of livestock - SBI.	Short and Long Term No changes in big game populations or habitat condition are expected.
	Long Term Continued slight improvement.	Long Term Continued habitat condition improvement.	Long Term No significant improvement would occur, continuing the low short term levels of big game - SAI.		
Upland Game and Waterfowl	Short and Long Term No significant impacts.	Short Term The improvement of 750 ac of riparian and 11,700 ac of wetland habitat due to fencing or other actions would benefit upland game and waterfowl. Meadows would improve due to decreased livestock use - SBI.	Short Term Overutilization of all habitats, especially in 3,265,000 ac where it would be most severe, would decrease habitat condition and therefore populations of upland game and waterfowl - SAI.	Short and Long Term All habitats would improve due to the removal of livestock use - SBI.	Short and Long Term No change in population levels or habitat condition would occur.
		Long Term Continued improvement in habitat for upland game and waterfowl.	Long Term Some improvement would occur, but habitat still would be degraded in most of the Schell RA from present levels.		
Nongame	Short Term Nongame habitat would improve due to fencing of streams and wetlands and primarily due to habitat improvement in at least 23 percent of the Schell RA due to sustained yield utilization and intensive grazing management - SBI.	Short Term All habitats for nongame wildlife would improve due to livestock reductions, sustained yield utilization and fencing or other improvement of 750 ac of riparian and 11,700 ac of wetland habitat - SBI.	Short Term Habitat condition would decline in 3,265,000 ac due to increased livestock use for 3 years - SAI.	Short and Long Term Habitat condition would improve throughout the area, with increased populations of nongame wildlife, due to the elimination of livestock grazing - SBI.	Short and Long Term No major changes over present conditions would occur.
	Long Term Continued improvement in nongame habitat.	Long Term Continued improvement in nongame habitat.	Long Term Some recovery would occur, but habitat and population would still be below present levels.		
Aquatics	Short Term Fencing would improve 9.8 ml of fish stream - SBI. Increased livestock use would decrease habitat condition on 5 ml of fish stream - SAI.	Short Term Fencing or other techniques would improve 31.7 ml of fish streams - SBI.	Short Term Twenty-two of the 26 fish streams in the area would be degraded by increased livestock use - SAI.	Short and Long Term All streams would be improved due to elimination of livestock - SBI.	Short and Long Term Stream habitat condition would remain at present levels.
	Long Term Additional streams would probably be improved.	Long Term Additional streams would be improved if their habitat condition was less than good.	Long Term Some improvement would occur in stream habitat quality, but present levels would still not be reached.		

Summary Table 1. Continued

Environmental Elements	Proposed Action	Resource Protection	Graze at Preference	No Livestock Grazing	No Action
Wild Horses	<p><u>Short and Long Term</u> No significant impacts. Mortality of 1-2 percent would be expected during period roundups to maintain present levels of use.</p>	<p><u>Short Term</u> The Antelope Herd would be reduced by 68 horses (27%) - SAI. Additional horses would be removed from other herd units, possibly resulting in significant losses to some herds - SAI. About 1 or 2 horses would die during roundup activities.</p> <p><u>Long Term</u> No significant impacts.</p>	<p><u>Short and Long Term</u> All wild horses would be removed from the Schell RA - SAI. About 5-10 horses would die during roundup and holding.</p>	<p><u>Short and Long Term</u> Wild horses would be allowed to maximize at about 2,000 as forage would be available due to elimination of livestock - SBI.</p>	<p><u>Short and Long Term</u> Population levels would remain at about present levels as periodic roundups would remove excess animals. A 1-2 percent mortality during roundup would be expected.</p>
Recreation	<p><u>Short and Long Term</u> Slight increase in fisherman days, increase of 74 hunter days per year, and slight increases in camping and ORV use.</p>	<p><u>Short and Long Term</u> Slight increase in fisherman days, increase of 7,000 hunter days per year and attendant increases in camping and ORV use - SBI.</p>	<p><u>Short and Long Term</u> At least a 10% reduction in hunter days is expected - SAI.</p>	<p><u>Short and Long Term</u> Slight increases in fisherman days, increase of 7,000 hunter days and attendant increases in camping and ORV use - SBI.</p>	<p><u>Short and Long Term</u> No major changes over present use patterns.</p>
Cultural Resources	<p><u>Short and Long Term</u> Little significant change over present conditions.</p>	<p><u>Short and Long Term</u> Reduced chance of loss of cultural resources due to decreased livestock use.</p>	<p><u>Short Term</u> Increased chance for loss of cultural resources due to increased livestock use.</p> <p><u>Long Term</u> Decreased livestock use would decrease the chance for significant adverse impacts.</p>	<p><u>Short and Long Term</u> Reduced potential for loss of cultural resources due to decreased livestock use.</p>	<p><u>Short and Long Term</u> No major changes from present levels of impact.</p>
Paleontology	<p><u>Short and Long Term</u> No significant impacts.</p>	<p><u>Short and Long Term</u> No significant impacts.</p>	<p><u>Short and Long Term</u> The potential for the loss of scientifically valuable fossils is increased due to grazing at preference - SAI.</p>	<p><u>Short and Long Term</u> No significant impacts.</p>	<p><u>Short and Long Term</u> No significant impacts.</p>
Economics Ranch Operations	<p><u>Short Term</u> No significant impacts.</p> <p><u>Long Term</u> Sheep operators would have a 5 percent increase in net income if water developments and seedings were placed totally on their allotments - SBI. No other ranch size would be significantly affected by this alternative.</p>	<p><u>Short Term</u> Small and medium sized cattle ranches would be reduced 6 and 8 percent in net income by livestock reduction - SAI. All ranch classes would be reduced from 7 to 21 percent by livestock reductions and a period of rest - SAI. Some ranchers would go out of business.</p> <p><u>Long Term</u> Medium sized cattle ranches would be reduced 6 percent in net income without a period of rest - SAI. All ranches except sheep operators would be reduced 7 to 22 percent by a period of rest - SAI.</p>	<p><u>Short Term</u> Many ranchers would be out of business. All ranch size classes would be significantly reduced (6 to 20 percent) in net income without water or seeding development - SAI. Only small cattle ranches would be significantly adversely affected if water and seeding developments were maximized on these allotments - SAI.</p> <p><u>Long Term</u> Net income would probably increase but is not quantifiable.</p>	<p><u>Short and Long Term</u> Most ranchers would go out of business. Sheep operations would be the least affected but net cash income would still be decreased by 26 percent from present levels; cattle operators would be decreased from 18 to 58 percent - SAI.</p>	<p><u>Short and Long Term</u> No significant changes from present conditions.</p>

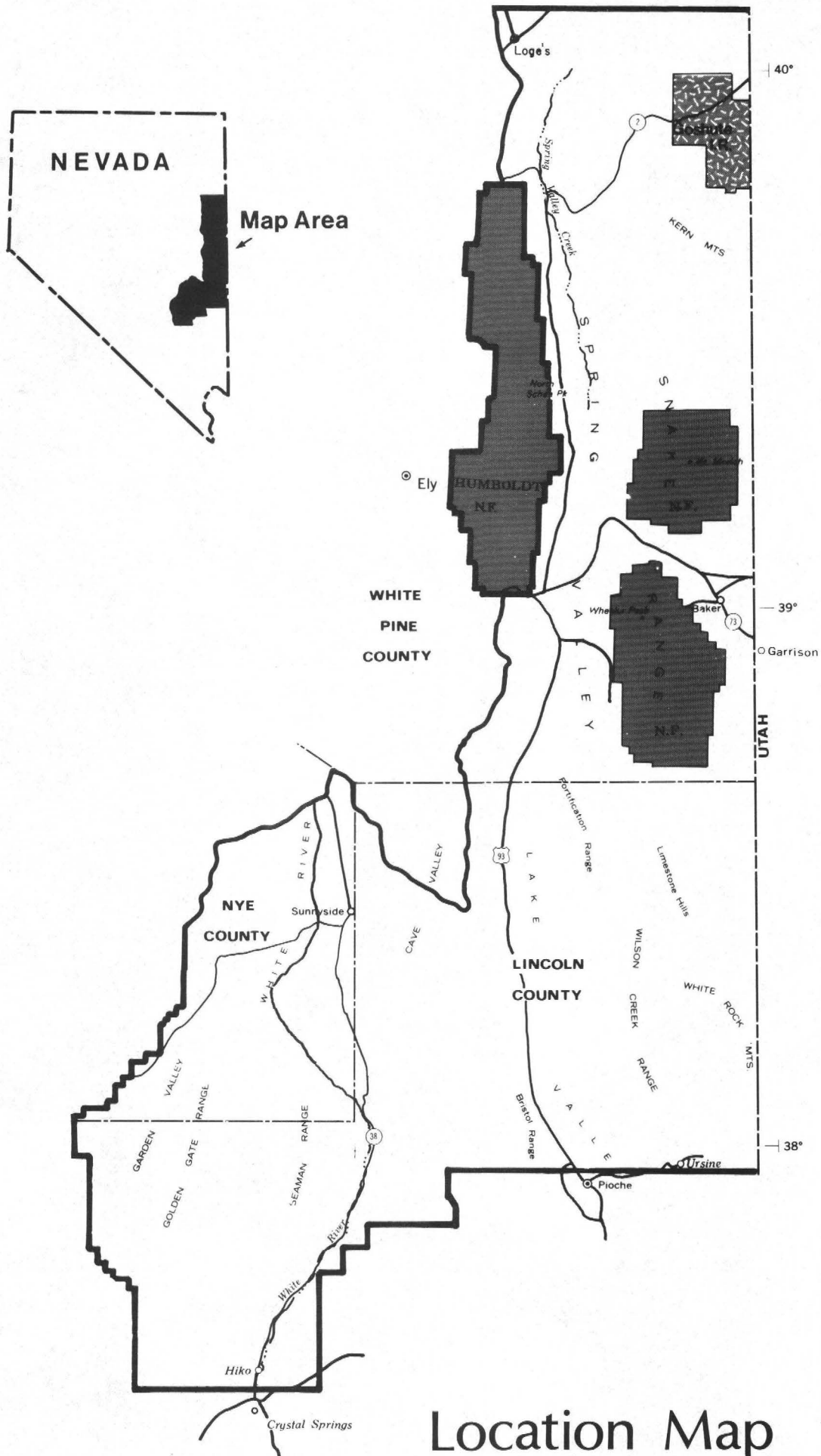
Summary Table 1. Continued

Environmental Elements	Proposed Action	Resource Protection	Grazing at Preference	No Livestock Grazing	No Action
Economics Regional	Short and Long Term No significant impacts.	Short Term Significant ( 5 percent) reductions would occur in the livestock and food and feed grain sectors without a period of rest, wholesale and retail sales would also be significantly reduced with a period of rest - SAI.	Short Term Significant decreases in employment and sales in the livestock and food and feed grain sectors would occur by the end of short term - SAI.  Long Term Significant adverse impacts would probably continue.	Short and Long Term Changes in livestock and food and feed grain sectors would be greater than 50 percent from present levels - SAI.	Short and Long Term No significant changes from present conditions.
Social Ranching Community	Short and Long Term Little significant impact but the overall increase in livestock use due to intensive grazing management would benefit ranchers and the rancher-BLM relationship.	Short and Long Term Livestock reductions for wildlife would cause a deterioration in relationships between ranchers and BLM - SAI.	Short and Long Term Relationships between ranchers and BLM would deteriorate after reductions in livestock use are made. Some ranchers would be forced out of business - SAI.	Short and Long Term The loss of grazing on public land would force most ranchers out of business and cause them to leave the area in search of employment - SAI.	Short and Long Term Ranchers would not be satisfied with the status quo, relationship with BLM would deteriorate - SAI.
Local Community	Short and Long Term No significant impacts.	Short and Long Term Adverse impacts to ranchers would create opposition to BLM policies in the local community - SAI.	Short and Long Term The overall relationship between the local community and BLM would deteriorate - SAI.	Short and Long Term The loss of most of the local ranching would result in strong opposition from the local community, as well as lifestyle and leadership changes - SAI.	Short and Long Term No significant impacts.
Regional and National	Short and Long Term No significant impacts.	Short and Long Term Most wild horse, wildlife, and environmental groups would support this alternative - SBI.	Short and Long Term Wild horse, wildlife, and environmental groups would not favor this alternative due to adverse impacts to multiple use management - SAI.	Short and Long Term Enhanced opportunities for wild horses and wildlife would generally be viewed favorably, although the loss of ranching would be considered adverse by most regional and national groups. Overall impact would be beneficial - SBI.	Short and Long Term Dissatisfaction with present policies by wild horse, wildlife, and environmental groups, especially existing use of livestock, would cause a deterioration of relationships between these groups, BLM, and ranchers - SAI.

<sup>a</sup>SBI = Significant Beneficial Impact.

<sup>b</sup>SAI = Significant Adverse Impact.





Location Map

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# CHANGES TO THE DRAFT EIS

## CHAPTER 1

On DEIS p. 1-11, second column, the first line should read "good condition for streambank cover or stability in the 1976 survey."

The title of Table 1-4, DEIS p. 1-12, is changed to read "Comparison of expenditures<sup>c</sup> for implementation ... ."

A new footnote to Table 1-4 as noted above should read "<sup>c</sup>The values are undiscounted totals for annual expenditures."

## CHAPTER 2

On DEIS p. 2-11, first column under BIGHORN SHEEP, tenth line is changed to read "The existing number of bighorn using the Schell RA is presently about 40 ... ."

On DEIS p. 2-15, second column, second paragraph under WILD HORSES, the last sentence is changed to read "This is due to a relatively small wild horse herd when compared to most other areas in Nevada. They are generally found in small bands and have access to considerable areas of public lands. Their mobility allows them accessibility to adequate water, cover and forage primarily because they are not restricted to limited resources in small areas."

## CHAPTER 3

On DEIS p. 3-3, first column, third paragraph, first line, should end "(Table 3-1)."

On DEIS p. 3-4, first column, fourth full paragraph is changed to: "In summary, all short term actions, both increases and decreases in forage use, result in a net gain of 1,337 AUMs (136,669 AUMs to 138,006 AUMs). This represents about a 1 percent increase over present use and would not be a significant impact to livestock grazing in the Schell RA."

The last sentence on DEIS p. 3-4 which ends on p. 3-8 is changed to read: "..., resulting in nutritional deficiencies and ultimately lower reproductive capacity in the worst case."

# CHAPTER 5

## PUBLIC PARTICIPATION

### SCOPING

Communication and consultation with all interested public land users and other concerned people have been important components in the Schell planning/MFP/EIS process and they will continue to be important in the MFP III decision making and implementation processes. Public participation--both formal and informal--will continue through such means as comment periods, news releases, Coordinated Resource Management and Planning (CRMP) and informational meetings.

EIS scoping meetings and public meetings for comments on MFP II recommendations were held jointly on April 6, 1981, in Pioche, Nevada, April 7, 1981, in Baker, Nevada, April 9, 1981, in Ely, Nevada, and on April 13, 1981, in Reno, Nevada. Brief meetings with local and state governmental entities were held on April 6, 1981, for the Lincoln County Commissioners, April 7, 1981, for the White Pine County Commissioners, and April 13, 1981, for the Nevada State Clearinghouse and Nevada Congressional Delegation.

Written comments and suggestions from individuals and interest groups were accepted from February 27 through May 15, 1981. The Federal Register, dated April 6, 1981, listed the notice of intent to prepare an EIS for the Schell RA. Governmental agencies that provided written comments included the Bureau of Indian Affairs and the Governor's Office of Planning Coordination. Other agencies contacted during scoping included the Nevada Department of Wildlife, U.S. Fish and Wildlife Service, Soil Conservation Service and U.S. Forest Service. Interest groups that responded in writing included Natural Resources Defense Council, Inc., Sierra Club, WHOA, and Resource Concepts Inc. for the Nevada Grazing Board.

### INTERAGENCY CONTACTS

Professional contacts have been made with the Nevada Department of Wildlife, the U.S. Fish and Wildlife Service, and the USDA Soil Conservation Service.

Coordination will be initiated with the Nevada Department of Highways should fencing of pasture and allotment boundaries occur along highway rights-of-way. Also, applications for water rights will be filed with the Nevada State Water Engineer for water projects.

The State Historic Preservation Officer was consulted on possible impacts to cultural resources (see Appendix E).

The Economics, Statistics, and Cooperatives Service, U.S. Department of Agriculture, provided economic data for use in the EIS. These data were based on meetings with area ranchers and budget information gathered by the ESCS as part of a nation-wide study.

### CONSULTATION AND COORDINATION IN REVIEWS OF THE EIS

Public comments continue to be vital to the planning and EIS processes, and will be welcomed before and after the final decisions are made in 1983. All comments received will be considered, even if letters are received after the EIS is published.

### AVAILABILITY OF THE FINAL EIS

The final EIS was sent to all those who received the draft EIS and all who commented on the draft. Anyone else requesting a copy may receive one. A Federal Register notice and an area news release were also used to inform the public about the final EIS availability.

Copies of the final EIS are available at the White Pine and Lincoln County libraries, the Nevada State Library in Carson City, and libraries at the University of Nevada at Las Vegas and Reno. The final EIS can also be seen at all BLM District Offices in Nevada, as well as the Salt Lake, Cedar City, Richfield, Fillmore, and Utah State offices in Utah, and the Office of Public Affairs, BLM in Washington, D.C.

### AVAILABILITY OF THE DRAFT EIS

The draft EIS was sent to the following listed agencies, organizations and all persons who indicated an interest. Those who responded with comments are indicated by an asterisk. Anyone wishing to see a copy of the Draft EIS may review it at any of the libraries or BLM offices listed below.

### FEDERAL AGENCIES AND LEGISLATORS

Department of Agriculture  
Forest Service\*  
Soil Conservation Service

Department of Commerce

Department of Defense  
Air Force

Department of Energy

Department of the Interior  
Bureau of Mines  
Bureau of Reclamation  
Fish and Wildlife Service  
National Park Service\*  
Bureau of Indian Affairs\*  
U.S. Geological Survey



Bureau of Land Management - Washington Office, Denver Service Center, Nevada State Office, Utah State Office, District Offices in Salt Lake, Cedar City, and Richfield, Utah; Susanville, California; Battle Mountain, Carson City, Elko, Las Vegas and Winnemucca, Nevada; and the Area Offices in Fillmore, Utah, and Tonopah, Nevada.

Environmental Protection Agency\*

Senator Howard Cannon

Senator Paul Laxalt

Congressman James Santini

## STATE OF NEVADA

DEPARTMENTS/DIVISIONS/BUREAUS  
(through the Nevada State Clearinghouse)\*

Agriculture

Conservation and Natural Resources

Environmental Protection\*

Forestry

Historic Preservation and Archaeology\*

State Parks\*

Water Resources

Wildlife\*

LEGISLATORS

Assemblyman John Polish

Senator Richard Blakemore

OTHERS

Nevada State Library

Office of the Governor

University of Nevada, Reno  
College of Agriculture  
Department of Renewable Natural Resources  
Desert Research Institute  
Library

University of Nevada, Las Vegas  
Library

LOCAL GOVERNMENTS, LIBRARIES AND GROUPS

Clark County  
Library

Ely, Mayor of

Lincoln County  
Commissioners  
Conservation District\*  
Cooperative Extension Service  
Library - Caliente and Pioche

Nye County  
Director of Planning  
Commissioners  
Cooperative Extension Service

Tonopah Public Library

White Pine County  
Commissioners\*  
Conservation District  
Cooperative Extension Service  
Library  
Planning Commission

## ORGANIZATIONS

American Horse Protection Association\*  
Ely District Grazing Advisory Board  
Humane Society of Southern Nevada  
International Society for the Protection of  
Wild Horses  
Natural Resources Defense Fund  
Nature Conservancy, The  
Nevada Cattlemen's Association\*  
Nevada Outdoor Recreation Association  
Nevada Woolgrowers Association  
Public Lands Council  
Renewable Resources Center  
Sierra Club, Toiyabe Chapter\*  
Wild Horse Organized Assistance  
Wildlife Management Institute\*  
Wildlife Society, The

## OTHERS

Colorado State University  
Documents Library  
D.W.C.S. Inc.  
Dames and Moore\*  
Elanco Products Company  
Environmental Impact Services  
Environmental Management Services Company  
Lincoln County Record, The  
Lost City Museum  
Meridian Land and Mineral Company  
Nationwide Forest Planning Clearinghouse  
Resource Concepts, Inc.\*  
SAI Engineers, Inc.  
Sterns-Rogers Engineering Company

## RANCHERS AND INDIVIDUALS

Frederick Baker - Baker Ranches, Inc.  
Rao H. Bateman  
Mabel Bates  
John Bidart - El Tejon Cattle Company  
Paul Bottari  
Leon Bowler  
Carole Marsh Carter  
James B. Cazier  
William T. and Kathie D. Coon  
Steve Coulter  
Bill Davidson - Steptoe Ranch\*  
Dearden Land & Livestock Co.\*  
Frank and Rose Delmue  
Pete Delmue  
Brent Eldridge - George Eldridge & Son, Inc.\*  
Mahonri Faber - Aaronic Order of the Supreme  
Council  
Helen E. Flynn  
Albert Frehner  
Joseph Gerrard  
Gonder Ranch

John E. Gurley  
 Dan Halstead and Sons  
 Robert L. Harbecke  
 John Hart  
 Willard Henriod  
 Joe V. Higbee and Sons  
 Fred Jenkins - Imperial Farms Land and Cattle  
 Company\*  
 Wayne A. and Kay Jones  
 Kirkeby Ranch  
 Macoy Larsen  
 William Lear  
 Paul Lewis  
 Kenneth and Gordon Lytle  
 Ronald P. Merlo  
 Richard D. Moody - Cleveland Ranch  
 Moriah Ranches, Inc.\*  
 Orren Nash  
 Fred W. Newbold  
 Lee Okelberry  
 Ray E. Okelberry  
 John Osborne  
 Bertrand Parris & Sons  
 Duke Pearce  
 Wayne Pearson - Pearson Brothers  
 James J. Praggastis  
 Clarence Probst  
 Jim Ratzloff  
 Reed B. Robison  
 Warren P. Robison  
 Rogers Brothers  
 George Rogers  
 Jimmy Rosa  
 Bill Rosevear  
 William E. Southern  
 Gary Sprouse - S&H Ranches, Inc.  
 Ray Staley  
 Thomas W. Steele  
 Robert Stewart  
 Brent Stewart - Stewart Brothers  
 Bill Thornley  
 Alan Torrel  
 Stuart L. Twitchell  
 Graclan Uhalde  
 UNELCO, Inc.  
 Ray Urrizago  
 Charles and Clayton Wadsworth  
 Chester O. Wheeler - Wheeler Land & Livestock  
 Company  
 Keith Whipple - Whipple Ranch  
 Harold Williams  
 Connie Wright - Great Basin Ranching & Mining  
 Inc.  
 Jay Wright  
 Yelland Ranches

## PUBLIC REVIEW AND HEARINGS

About 200 copies of the draft EIS were sent out near the end of June, 1982, with accompanying letters noting the date, place and time of the public meetings and the procedure for the public to submit comments. Also, about 150 copies of the Summary were sent to interested persons. About 50 more draft EIS's were distributed later in response to requests. The final date for comments to be received in order to be included into the final EIS was given as August 17, 1982. A Federal Register notice of the release of the DEIS and all pertinent information about hearings and comments were printed on June 23, 1982, and a news release with the same information was sent to area newspapers in late June.

The first public meeting was held on July 12 in Reno and was attended by 7 persons. Oral testimony was given by 4 persons and written statements were submitted by one of the commentators. The second public hearing was held in Ely on July 13 and was attended by 14 persons. Three of those gave oral testimony and one of those had written comments also.

Transcripts of these public hearings are available for inspection at the BLM Ely District Office, at the BLM Nevada State Office, 300 Booth Street in Reno, and at the BLM Office of Public Affairs, 18th and C Streets in Washington, D.C. Also, transcripts may be purchased from Bonanza Reporting, 1111 Forest, Reno, NV 89509.

## INTRODUCTION TO RESPONSES

All written and oral comments have been read and evaluated by Ely District, Nevada State Office, and BIO/WEST, Inc., resource specialists. Additions to or changes in the DEIS are noted in the Changes section of this document, as well as in the Summary. Responses to questions and substantive comments were written by the various specialists and then reviewed by an interdisciplinary team for consistency and accuracy of the responses.

Most people who presented oral comments also submitted similar written comments, or the oral comments were similar to written comments by others. Therefore, responses to only those oral comments not covered adequately by written comments are included in the following section. All written comments were responded to.

Those comments that presented new data, questioned facts and/or analyses, and raised questions or issues bearing directly upon the Draft EIS were responded to in this final EIS. Letters that were general or did not contain direct comments on the adequacy of the EIS were reviewed but no response was made.

Oral and written comments received on the draft EIS are listed below. Following this listing is a copy of substantive comments made at public hearings and in comment letters. Responses to the comments appear across from the respective oral testimony or comment letter.

## ORAL TESTIMONY FROM PUBLIC MEETINGS

### RENO

John McLain, Resource Concepts, Inc., for the  
 N-4 State Grazing Board  
 Fred Jenkins, Imperial Farms Land and Cattle  
 Company  
 Rose Strickland, Toiyabe Chapter, Sierra Club  
 Tom Eaman, Dames and Moore

### ELY

David Eldridge, rancher, Schell Resource Area  
 Bill Davidson, N-4 State Grazing Board  
 Brent Eldridge, rancher, Schell Resource Area

## COMMENT LETTERS

1. U.S. Forest Service
2. Lincoln County Conservation District
3. Wildlife Management Institute
4. Carl J. Dearden
5. Governor's Office of Planning  
Coordination, Nevada
6. Nevada Division of State Parks
7. Nevada Department of Environmental  
Protection
8. Nevada Division of Historic Preservation  
and Archaeology
9. Nevada Department of Wildlife
10. Bureau of Indian Affairs
11. Resource Concepts, Inc., for the N-4 State  
Grazing Board
12. White Pine County Board of County  
Commissioners
13. Nevada Cattlemen's Association
14. Sierra Club, Toiyabe Chapter
15. U.S. Environmental Protection Agency
16. National Park Service
17. American Horse Protection Association,  
Inc.
18. David Eldridge - written comments from  
Ely Public Meeting

## Comment Letter 1

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE  
324 25th Street  
Ogden, UT 84401

1950  
JUL 23 1982



George Cropper, Acting District Manager  
Bureau of Land Management  
Ely District  
Star Route 5 Box 1  
Ely, NV 89301

Dear Mr. Cropper:

We have reviewed the draft Schell EIS and find it to be generally well written and comprehensive in scope. Good coverage/discussion of terrestrial and aquatic resource values, particularly game species.

1-1

Although classified and sensitive plants are mentioned, there was not similar coverage/discussion on threatened and endangered and sensitive animals. Perhaps this should be emphasized a little more?

A considerable acreage of National Forest land is within, or adjacent to, the Schell Resource area. Therefore, management action taken on BLM lands may also have a strong influence on the National Forest lands and vice versa. A section should be added to recognize this interrelationship

1-2

and coordination needs. The CRMP effort may provide for this coordination. If so, it should be spelled out.

We agree the proposed action alternative will provide an equitable balance for managing resource values on the Schell Range.

RICHARD K. GRISWOLD  
Director  
Planning and Budget

## Response

1-1 There were no threatened, endangered, or sensitive animals that may be adversely affected by the alternatives.

1-2 The BLM will continue to solicit the Forest Services' comment on management within the Schell RA. We expect the Forest Service to be represented on CRMP committees that may be recommending actions that would affect National Forest lands. Generally, BLM actions affecting Forest Service lands are coordinated by the agencies both through direct consultation and the CRMP process.



## Comment Letter 2



Lincoln County Conservation District  
P.O. Box 459 · Caliente, Nevada 89008 · Phone (702) 726-3101

*Board of Supervisors*  
Chairman, Keith Whipple  
Vice Chairman, Robert Mathews  
Sec. Treas., Ralph Smeath  
Equipment Mgr., Zone 1, Kenneth Lee  
Equipment Mgr., Zone 2, William Schofield  
Member, Howard McCrosky  
Member, Jay Wright

July 26, 1982

USDI, Bureau of Land Management  
Ely District Office  
Ely, Nevada

Dear Sirs:

We have reviewed the Schell EIS. Our major exceptions to the items have to do with general policy rather than conclusions, therefore we will limit our comments to that which is pertinent to the EIS promulgation.

2-1 Our most serious reservation is relative to the establishment of beginning livestock AUM's. We cannot understand why the numbers begin at a figure that does not have any bearing on the resource base. Using the average grazing of the 77-79 grazing season has very little relationship to range productivity. Actual use, in most cases, is mostly dictated by the economic status of the permittee or the cattle industry at the time.

We agree that the initial stocking rates should be closely watched, using a range-monitoring program for a guide in making future adjustments.

We believe it most important to revise initial stocking rates, in most cases to the preference rates that are established, or to such other rates as may be agreed upon on an individual basis.

2-2 The statement concerning Social Conditions having little change is not agreed with. We feel a reduction of 48% will have a significant impact, especially on some of the ranchers. This may cause a severe hardship on some of them who, since the 77-79 period were able to build up their herd numbers.

Sincerely,

Kenneth D. Lee

KDL;mnh

## Response

2-1 The years 1977 to 1979 were used to establish a starting point since these were the years immediately preceding the EIS. This average 3 years use was used to represent "existing use," which changes from year to year. For example, in 1980, about 127,800 AUMs were utilized and in 1981 about 130,800 AUMs were used (assumed 50 percent of preference for allotments with non-use each year), compared to the 136,669 AUMs used in the Draft EIS. This was done because no reliable productivity data was available. BLM is aware that some operators were at a lower than normal level in 1977-1979, for example 11 allotments were placed at 50% of preference for analysis purposes since they had non-use or were in transfer status with no established routine for these years. Therefore, through consultation and coordination, some individual adjustments may be required to set "existing use" levels. By and large though the levels of use in the DEIS are reflective of preferred levels by ranchers, as noted on page 3-13 from rancher interviews.

2-2 It should be remembered that the 48 percent reduction is a change in active preference levels, not actual use. Your concern was also expressed in the Draft EIS in paragraph 2, Ranching Community, Social Conditions, p. 3-13. The purpose of an EIS is to examine a range of alternatives to a specific proposal and estimate the impacts of implementation of any decision within that range of alternatives. In the case of the Schell Grazing EIS, we have examined the impacts of no grazing, a small reduction in actual use, limiting use to existing levels, and increasing use to preference levels. The actual decisions will be made at MFP-3 and will consider the impacts of all of the alternatives prior to making a decision. In the case of grazing levels on the Schell RA, the Area Manager proposed to limit use to existing levels. However, the District Manager may in his decision elect a different management thrust, as long as that decision falls within the spectrum of alternatives considered in the EIS. He could elect to go with one of the alternatives as written or could select portions of various alternatives. For grazing use levels, for example, he could decide to hold use to existing levels on allotments generally in poor livestock forage condition while allowing increases to preference on allotments in fair or better condition. Or he could allow personal or CRMP appeals to determine individual user increases from existing use levels. The EIS is not a decision document, but an advisory analysis which informs the decision maker of any and all impacts of his potential decisions. Since, at this point in time, we do not know what decision might be made by the District Manager and do not want to prejudge his decision, the MFP-2 recommendation to use the 1977-79 average licensed use will stand and the impacts of implementation are available for the decision maker.

Comment Letter 3



# Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774

DANIEL A. POOLE  
President  
L. R. JAHN  
Vice-President  
L. L. WILLIAMSON  
Secretary  
JACK S. PARKER  
Board Chairman

August 9, 1982

District Manager  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Sir:

The Wildlife Management Institute is pleased to comment on DRAFT SCHELL GRAZING ENVIRONMENTAL IMPACT STATEMENT, Nevada.

The plan is basically one to benefit 58 permittees. It avoids the immediate, practical and obvious land management need of reducing livestock use and fencing riparian areas. Such action would avoid most of the predicted long-term expenses of \$3,100,000 (only \$14,000 for guzzlers are directly attributable to wildlife). Basic land management needs for public resources would be satisfied by the \$700,000 cost of the No Livestock Grazing Alternative. Thus we have:

<b>3-1</b>	\$3,100,000 Preferred Alternative
	- 700,000 No Grazing
	\$2,400,000 Direct Subsidy to 58 permittees. This is an average subsidy of \$41,379 per permittee.

The results of all these improvements are so minuscule as to raise a question--"why this plan?"

**3-2** Summary table 1, page 3, tells us that in the short term 1 percent increase in livestock use and in the long term 2 percent increase (this is 2,733 AUM in the long term or 683 cows in a 4 months use season). All that for an expenditure of \$2,400,000. At the same time, there would be a "slight increase" in big game. We assume it would be less than 1 percent.

Two seedings are proposed. One a "multiple use seeding" of 4,000 acres would produce an additional 400 AUM; 70 percent for livestock would be 280 AUM. The other 120 AUM would be for wildlife. The listed cost of \$131,000 computes out to an average of \$327.50 per AUM for all classes. This could be saved by reductions and grazing systems, even avoiding the possibility of selling some public domain to retire the national debt as has been proposed.

**3-3** All the predictions on Page 1 regarding AUM and land condition are not predictable. The whole plan will be based on results of monitoring at the end of 3 years, not on present knowledge of the area.

## Response

**3-1** Please note that in the Proposed Action, a 750 acre wildlife seeding costing \$27,000.00 and 20 miles of fencing for riparian areas costing \$92,000.00 are also included and can be directly attributed to wildlife. The \$2,400,000 is a portion of the grazing fees charged to the allottees and must be spent on range improvements (20 year figure).

**3-2** The expenditure of \$3,100,000 is not a new or additional cost but was based on current funding levels. The investment of \$155,000 per year is a very low level of investment, typical of past levels for the Schell RA. By limiting spending for improvements, only areas with major problems can expect range improvements. Therefore the continued expenditure of funds at present levels would result in a small increase in livestock or wildlife use of the area in the Proposed Action. Big game numbers could increase more than predicted, although there is no accurate way to predict the magnitude of the change.

**3-3** Your comment is generally correct. Monitoring information will be used to make grazing decisions, much of the analysis in the EIS is for analysis purposes but reflects what we believe will happen in the future. The analysis was conducted with the best available data.

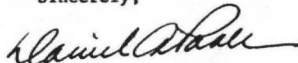
## Comment Letter 3

-2-

Some specific comments follow:

- 3-4** Page 1-1, Problem 3. To upgrade all riparian systems sounds impossible with only 23.8 miles of fencing planned.
- 3-5** Page 3, 3rd Paragraph. This water development could hurt wildlife because it puts cows into areas not now grazed. This question was not addressed. Who will have the water rights to these?
- Page 3-3, 1st Paragraph. This is a delay to avoid cuts that should be made.
- Page 3-3, Right Column, 4th Paragraph. This let burn policy is good and we commend it.
- 3-6** Page 3-4, 3rd Paragraph. Check these figures, they do not agree with the 4th paragraph on page 3.
- 3-7** Page 3-4, 6th Paragraph. Wildlife seeding of 750 acres to provide 195 AUM (1 percent of reasonable deer numbers) seems lots of money for little benefit.
- Page 3-10. The proposed action without improvements would decrease AUM 2 percent. With improvements, the increase would be 1 percent.
- 3-8** Page 3-13. Social conditions. The action will have little impact on ranchers or ranching communities. The only reason for doing it then must be to avoid reductions. We wonder why it is so important to preserve a certain life style for ranchers. The same effort and expense does not go into preserving the life styles of the small sawmill owner, the gypo logger, the Mom and Pop grocery--even the Wildlife Biologist.
- 3-9** Page 4-1. This is the first EIS we have examined prepared by a consulting firm (Bio/West). We are concerned that no Bureau of Land Management wildlife staff are listed as being involved in coordination with the consultants.
- The plan is unacceptable because of limited benefits and high costs.
- These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,



Daniel A. Poole  
President

DAP:lbb

## Response

- 3-4** The objectives on p. 1-1 are not totally met by any alternative. Therefore, the proposal to fence 9.8 miles of stream in most need of corrective action in the Proposed Action is a start toward that objective. Additional fencing of riparian and wetland areas may occur in the long term in the Proposed Action. Some riparian areas in the Schell RA are in excellent condition and therefore do not require fencing.
- 3-5** Water developments funded by BLM will be for multiple use and wildlife are expected to use them. Wildlife should not be hurt by these water developments as they are also often limited by available water. Therefore, water development will open up new areas for both livestock and wildlife. Used in conjunction with a sustained yield grazing system maintained through monitoring, no adverse impacts to wildlife should occur. In accordance with departmental policy, water rights on non-reserved waters will be filed for under Nevada State Law either cooperatively with the range user or by the BLM.
- 3-6** The figures in the EIS are accurate but the wording of paragraph 4 on p. 3-4 is confusing. This has been corrected; please see the "Changes to the Draft EIS" section.
- 3-7** The seeding will provide forage in a key deer summer area where forage is presently lacking. Summer range is used for about 7 months; therefore, an additional 100 deer would be supported each year for 20 years with this seeding. Initial cost of seeding for any grazer in the Schell RA is high.
- 3-8** The alternatives are structured to favor certain resource objectives over others (p. 1-1) and not to address the interests of any user group. The social impact analysis considered the effects of each alternative on the lifestyles for the various affected communities, not only for ranchers. There is no assumption in the EIS that any lifestyle or user group is preferred over others.
- 3-9** BLM staff specialists did review and comment on the Draft EIS at various stages during its development. However, only those with a substantial role in the EIS preparation were listed in the Draft EIS.

## Comment Letter 4

August 12, 1982

Bureau of Land Management  
 Ely District Office  
 S R 5 Box 1, Ely Nevada 89301

Attention: Wayne Lowman

I'm writing to you in regards to the Schell Grazing Environmental Impact Statement.

In regards to fencing the Big Springs Creek, between Cheke Cherry and Haalin Valley grazing allotment( Table 2-2 Stream riparian areas in the Schell Resource Area). I am protesting it for the following reasons.

- 4-1
1. It will prevent cows and small calves from watering in the Spring.
  2. Fencing would cause a congestion problem of cattle congregating causing seperation of calves from mothers causing burners.
  3. I also pretest it as a water user and owners stand point.
  4. With livestock kept away from the ditch it will cause vegetation and will cause a water lose.
- 4-2
5. As president of the Second Big Spring Irrigation Co. I pretest the fencing of this ditch because vegetation will grow and cause a great water lose. Irrigation water is very important in this dry area so would certainly hate to have anything interfer with it.

Sincerely,

*Carl J. Dearden*

Carl J. Dearden  
 Milford Rt.  
 Burbank, Utah 84731

## Response

- 4-1 Riparian fencing would have breaks for livestock watering at least every 1/2 mile; therefore, livestock should not be affected any more than at a trough or other solitary water source.
- 4-2 Increases in riparian vegetation should not affect the available water for irrigation to a noticeable degree. Fencing will allow for multiple use of the area, which is presently overused by livestock. Fences are proposed for the original stream channel, not the ditched portion of the stream.



## Comment Letter 5



STATE OF NEVADA  
GOVERNOR'S OFFICE OF PLANNING COORDINATION  
CAPITOL COMPLEX  
CARSON CITY, NEVADA 89710  
17021 885-4865

August 3, 1982

Mr. Edward F. Spang  
State Director  
Bureau of Land Management  
Nevada State Office  
300 Booth Street  
Reno, Nevada 89520

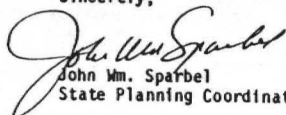
RE: SAI NV# 83300003 Project: Draft - Schell Grazing EIS

Dear Mr. Spang:

Attached are the comments from the following affected State Agencies:  
Divisions of Environmental Protection, State Parks, Historic Preservation and  
Archeology, and the Departments of Wildlife and Agriculture concerning the  
above referenced project.

These comments constitute the State Clearinghouse review of this proposal.  
Please address these comments or concerns in the final decision.

Sincerely,

  
John Wm. Sparbel  
State Planning Coordinator

JWS/sl  
Enclosure

## Response

## Comment Letter 6


 DIVISION  
OF  
STATE  
PARKS

## MEMO

TO John Sparbel  
FROM John Meder *JM*  
SUBJECT SCHELL GRAZING EIS

801.6b(6)

DATE 7-12-82

The proposed allocation of forage to livestock, wildlife and wild horses will have substantial and long range impacts on the Division of State Parks and outdoor recreation in the Schell Resource Area. The Resource Protection Alternative is the best alternative from a recreation and outdoor resource protection point of view. The Division would like to see a modified resolution between the Proposed Action and the Resource Protection Alternative as the best compromise.

6-1

The Nevada Statewide Comprehensive Outdoor Recreation Plan (SCORP) documents outdoor recreation, conservation and open space needs for the State through the SCORP and associated other issues affecting the Schell Resource Area.

- 1) The resource plan should address the continued importance of the public domain as a resource for dispersed recreation. Dispersed recreation is outdoor recreation occurring at undeveloped sites in a natural setting, such as off-highway vehicle use, rock hounding, camping, hunting, hiking, spelunking, etc.

The resource plan should address the access, opportunities, resource management, etc. affecting dispersed recreation. Our SCORP Planning Region IV includes Lincoln, White Pine and Eureka counties, and covers the Egan Resource Area. While this region has 1.7 percent of the state population, it provides a much higher percent of the dispersed recreation activity. A recent survey and study done by the SCORP staff indicated the following percent of statewide activity occurring in Planning Region IV for the listed activities:

Primitive Camping	14.1
Hiking, Backpacking	9.2
Off-highway Vehicle Use	15.5
Rockhounding	14.3
Horseback Riding	15.4
Exploring	10.9
Shooting (non-game)	9.6
Hunting	23.0
Photography	12.5
Sightseeing	11.4
Fishing	11.3

- 2) There are many recreational uses and sites within the resource area that need to be added. These include:

## Response

- 6-1 We appreciate the additional information on outdoor recreational use of the Schell RA. As noted in the DEIS, only minor effects on dispersed recreation are expected; therefore, much of the information noted in your comment was not included in keeping with recent CEQ guidelines for limiting the size of EIS's. Your comments will be considered in the overall MFP process.

## Comment Letter 6

Schell Grazing  
Page 2

- a) Basin and Range OHV trail as identified in the Nevada State-wide Trails Study. This trail runs from Las Vegas dunes to the Pony Express Trail in Spring Valley. A corridor should be maintained and a detailed trail provided as part of MFP III.
  - b) Pony Express Trail, likewise an OHV trail, that goes from Utah to California.
- 3) There are several Natural Heritage areas that should be designated Areas of Critical Environmental Concern, and receive special multiple use management. These include:
- Blue Mass Spring Scenic Area, Spring Valley Swamp Cedar, Spring Valley White Sage Flat, Shoshone Pygmy Sage, Mt. Grafton Scenic Area, Whipple Cave, Mormon Spring, Coal Valley, Hiko Spring, the Highland Range, and Osceola Cave, Tunnel and Area.
- 4) The transfer of the R&PP areas for expansion of Spring Valley State Park should proceed as soon as possible.
  - 5) Visual resources should be considered throughout the forage allocation process and all planning processes, with special consideration to these proposed scenic roads:
    - a) The highway from Baker to Lehman Caves National Monument.
    - b) Highway 6, 50 from Sacramento Pass to Connors Pass.
    - c) Highway (85) 322 from Pioche to end.
    - d) Highway (38) 318 for its entire length within Schell Resource Area.

JLM:tls

## Response

## Comment Letter 7

## Response

Environ. from.  
State Parks  
Forestry  
Water Planning

NEVADA STATE CLEARINGHOUSE REVIEW FORM

PLANNING COORDINATOR  
GOVERNOR'S OFFICE  
CAPITOL COMPLEX  
CARSON CITY, NEVADA  
891-4215

TO:  Transportation  
 Conservation & Natural Resources  
 Human Resources  
 Wildlife (2)  
 Budget  
 Historic Preservation & Archeology  
 Agriculture  
 Community Services Agency  
 Commerce  
 Public Service Commission

Employment Security Department  
 Energy  
 Law Enforcement Assistance  
 Taxation  
 Equal Rights Commission  
 Economic Development  
 G.O.P.C.

RECEIVED  
JUN 25 1982 6-24-82  
ENVIRONMENTAL  
PROTECTION

FROM: John Spurbel State Planning Coordinator

IAI NV # 83300003 PROJECT: Draft - Schell Grazing  
EIS

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to:

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Areawide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations

PLEASE submit your comments to this office NO LATER THAN 7-16-82 by checking the appropriate box below and returning the form to this office. Please do so even if you have no comment on this particular project so that we may complete our processing.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY ( )

- No comment on this project  
 Proposal supported as written (see below)  
 Additional information (see below)
- Conference desired (see below)  
 Conditional support (outlined below)  
 Disapproval/denial of funding (must specify reason below)

Comments (use additional sheets if necessary)

AIR - Dick Serdoz: The project appears not to have an impact on Air Quality and in general, is in a clean area of the State. There is an existing area adjacent in the Steptoe Valley that has been designated by EPA as non-attainment area for SO<sub>2</sub>. The project will not impact SO<sub>2</sub>.

7-1

WATER - Harry van Drielen: Will the projected fencing of stream segments improve water quality for fisheries and stock watering. Suggest additional fencing along fishable waters with development of peripheral stock watering facilities.

SOLID WASTE - Verne Rosse: No comment.



L. W. Hodgson / Hgz Administrator 885-4670 6/30/82  
Reviewer's Signature Title Phone Date

- 7-1 As noted on pages 3-2 and 3-16, water quality would improve due to fencing, although since most of these areas already pass Nevada Water Pollution Control standards, the improvement was not considered significant. In both the Proposed Action and Resource Protection alternatives, additional streams would be fenced in the long term. Future surveys would determine which streams need management actions.

**Comment Letter 8**

**Response**

*Environ. Serv.*  
*State Parks*  
*Forestry*  
*Water Planning*

NEVADA STATE CLEARINGHOUSE REVIEW FORM

PLANNING COORDINATOR  
 GOVERNOR'S OFFICE  
 CAPITOL COMPLEX  
 CARSON CITY, NEVADA  
 893-4665

Transportation  
 Conservation & Natural Resources  
 Human Resources  
 Wildlife (2)  
 Budget  
 Historic Preservation & Archeology  
 Agriculture  
 Community Services Agency  
 Commerce  
 Public Service Commission

Employment Security Department  
 Energy  
 Law Enforcement Assistance  
 Taxation  
 Equal Rights Commission  
 Economic Development  
 G.O.P.C.

FROM: *John Swartz* State Planning Coordinator  
 DIVISION # 83300003 PROJECT: Draft - Schell Grazing EIS

RECEIVED 6-24-82  
 JUN 23 1982  
 Division of Historic Preservation and Archeology

Attached for review and comment is a copy of the aforementioned project. PLEASE evaluate it with respect to:

- 1) the program's effect on your plans and programs
- 2) the importance of its contribution to State and/or Areawide goals and objectives
- 3) its accord with any applicable law, order or regulation with which you are familiar
- 4) additional considerations.

PLEASE submit your comments to this office NO LATER THAN 7-16-82 by checking the appropriate box below and returning the form to this office. *Please do so even if you have no comment* on this particular project so that we may complete our processing.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY ( )

No comment on this project  
 Proposal supported as written (see below)  
 Additional information (see below)  
 Conference desired (see below)  
 Conditional support (outlined below)  
 Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

**8-1**

This Division has received and reviewed the draft of the Schell Grazing Environmental Impact Statement. Adequate consideration has been given to known cultural resources in the proposed project area. However, the District must make a commitment to perform more Class II survey and inventory work in the area in accordance with the PMOA between the Advisory Council, the BLM and the NCSHPO.

The BLM should contact this Division for specifics regarding this work.

*Dynia Nelson*  
 Signature Title SHPO  
 (702) 885-4380 7/23/82  
 Phone Date

JUL 1982

**8-1** We appreciate your comment. Contingent upon funding, additional inventories will be undertaken in accordance with the PMOA. Also see Standard Operating Procedure Number 4 (DEIS p. 1-22).



## Comment Letter 9

## Response



WILLIAM A. MOLINI  
DIRECTOR

ROBERT LIST  
GOVERNOR

1100 VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89520

TELEPHONE (702) 784-6214

July 29, 1982

Mr. John Sparbel  
State Planning Coordinator  
State Clearinghouse  
Capitol Complex  
Carson City, NV 89710



Dear John:

The Nevada Department of Wildlife appreciates the opportunity to review and comment on the Draft Schell Grazing EIS (SAI NV #83300003) and I especially appreciate the time extension for comments that was allowed by your office. We firmly believe that grazing EIS's are an important part of the planning process in terms of management direction and therefore like to insure that all fish and wildlife related matters have been incorporated and considered in a duly manner, an evaluation that is very time consuming. In view of the above, please find listed below those items discussed in the document that are of concern to our agency.

GENERAL COMMENTS

There appear to be major omissions and flaws in the data used to develop this draft. Specifically, riparian habitat and mesic sites were not properly identified to facilitate knowledgeable resource management decisions. The proposed action gives very little real consideration for big game. For example, an increase of 165 deer in 20 years and no recommended bighorn or antelope introductions points out this lack of consideration.

The stated goals of protection and enhancement of wildlife, scenic, and recreational opportunities for the "Resource Protection Alternative" seems rather biased toward producing a negative reaction to the alternative, as if the only things benefitted would be wildlife, scenics and recreation. Actually this alternative would protect and enhance the basic land resources such as soil, water, and vegetation which is the heart of the multiple use concept. If these basic land resources are protected and enhanced, then a productive future for wildlife and livestock can be assured. The short term sacrifice for the long term benefit seems to be an acceptable price to pay. The "Graze at Preference Alternative" is probably unacceptable to the BLM and certainly unacceptable to wildlife resources, but will likely be supported by the livestock industry because of the obvious benefits.

## Comment Letter 9

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Page 2

- 9-1 If time permits, we would suggest the development of an alternative that would combine portions of the "Proposed Alternative" and the "Resource Protection Alternative." This would at least deal in a generally favorable way towards the basic land resources and not be geared for a specific resource user group.

### SPECIFIC COMMENTS

Page 3, Table 1 - Riparian and Wetland Areas

- 9-2 The stated improvements should be quantified with the current condition and trend of riparian areas categorized. The expected condition and trend under various alternatives should also be listed for comparative purposes.

The 250 acres of improvement represent what percent of available riparian and wetland habitat? This should be quantified and qualified as in the section on Vegetation Livestock Condition and apparent trend in Table 1.

Page 4, Table 1 - Upland Game and Waterfowl

- 9-3 Under Short and Long Term - No Significant Impact, the quantity, condition and trend of key upland game and waterfowl habitats (sage grouse brood meadows, wetland habitats) must be determined and evaluated before a determination of impacts can be made.

Page 1-2, Table 1-1 - MFP-2 Recommendations

- 9-4 Change statement number 2 to read, "Cooperate with NDOW to facilitate reintroductions of bighorn, antelope and elk when studies show that there is forage in excess of existing demand."

Page 1-2, Table 1-1 - Resource Trade-Offs

The statement "Fewer areas will be available for reintroduction." is an understatement since licensed livestock use will equal the 1977-79 average at the onset and most areas are admittedly in an overgrazed condition.

- 9-5 Page 1-2, Table 1-1 - MFP-2 Recommendations

"No bighorn sheep are to be introduced into areas where domestic sheep currently graze." Although this statement may be prudent, it is not a decision which should be unilaterally made.

## Response

- 9-1 The MFP-3 decision by the District Manager may include portions of the various alternatives, rather than one alternative in total.
- 9-2 Summary Table 1 was not meant to be a complete listing of the impact analysis, but rather a summary of that analysis. See Chapter 3 for the answers to your questions. For example, p. 3-3 analyzes the percentage improvement in riparian and wetland areas for the Proposed Action.
- 9-3 Little change in condition or trend of key upland game or waterfowl habitats is expected, as noted on p. 3-8.
- 9-4 We can see no difference in the wording as used in the EIS.
- 9-5 We appreciate your comments; they will be considered in the MFP-3 decision. For further explanation of the difference between MFP-2 recommendations and MFP-3 decisions, please see Response 2-2.

## Comment Letter 9

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Page 3

Page 1-2, Table 1-1 - MFP-2 Recommendations

9-5  
(Cont.)

An HMP should not be used as a vehicle to facilitate supplemental releases to augment existing, select or low-level populations of big game.

Page 1-3, Table 1-1 - MFP-2 Recommendations

9-6

The recommendations do not make reference to maintenance, improvement or management of key or critical habitats for sage grouse which include nesting areas, upland meadows, and water sources.

Page 1-4, Table 1-2 - Allotment Characteristics

The following allotments lack adequate identification in the Problem/Objectives category. We would suggest the following changes:

9-7

Allotment	No.	Problem/Objectives
Chin Creek	0104	1, 2, 3, 4, 5
Tippett	0106	1, 2, 3, 4, 5
Tippett Pass	0107	1, 2, 3, 4, 5
Red Hills	0108	1, 2, 3, 4
Mill Spring	0109	1, 2, 3, 4
Muncy Creek	0111	1, 2, 3, 4
Sacramento Pass	0123	1, 2, 3, 4
Pine Creek	1012	1, 2, 3, 4
Needles	1016	1, 2, 3, 4, 5
Hardy Spring	1022	1, 2, 3, 4, 5
Worthington Mtn.	1021	2, 3, 4

Page 1-7, No. 3 - Short Term Management Actions

9-8

Existing numbers (1982) are, in some instances, very different from the numbers in 1980, 1977 or 1975. What numbers are represented in the discussion? How does this decision fit with NDOW intent for population growth or BLM acceptance of reasonable numbers? This section is very confusing and should be clarified.

9-9

Also, will monitoring be accomplished to document forage available to big game as well as livestock (see No. 1, Short Term Actions) and how will forage increases be allotted?

## Response

9-6

This table is a summary of the general recommendations of MFP. Many other recommendations including your suggestions went into the MFP. However, it would be prohibitive to print all recommendations. Sage grouse protection will be included in any site specific proposal.

9-7

As noted on p. 2-2, only riparian areas around potentially fishable streams were included in the EIS as data on other riparian areas were not available. The allotments you suggest adding a problem 3 to do not have streams used in the EIS on them (see Table 2-2, p. 2-4). Thank you for your recommendation on areas with utilization problems. They will be considered in the MFP-3 decisions.

9-8

Existing numbers of big game in each allotment were developed from 1980 NDOW census information in cooperation with NDOW personnel. This alternative has not proposed to manage for reasonable numbers of big game. However, actual numbers of big game to be managed for will be determined through monitoring with CRMP input.

9-9

Monitoring will document the forage available for all grazers, including big game. Forage increases will be allotted based on the type of forage in a specified area. Wildlife forage will be allocated to wildlife, livestock forage will be allocated to livestock and wild horses.

## Comment Letter 9

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### Page 1-7, No. 4 - Short Term Management Actions

- 9-10** The assumption that 4,000 acres of seedings will benefit big game cannot be made unless a number of stipulations are made. In most instances seedings will have to be designed to benefit livestock or wildlife. Very seldom can seedings be highly beneficial to wildlife if livestock forage is the primary concern. What specifications and design criteria will be applied to insure that seedings benefit wildlife?

### Page 1-7, No. 5 - Short Term Management Actions

- 9-11** The development of sound grazing management will contribute more to attain reasonable numbers than would 750 acres of seeding.

### Page 1-7, No. 8 - Short Term Management Actions

- 9-12** As long as there is a justification for 71.9 miles of new fence to improve the distribution of livestock, there is equal or greater justification to fence riparian zones. The 9.8 miles of riparian fencing is not even a sufficient token, let alone a reasonable response to the recognized need to protect riparian zones. Therefore, the fencing of 31.7 miles of riparian zones that are in less than good condition should be a priority decision. A yearly evaluation of unfenced riparian zones should be completed and those found in a state of degradation should be fenced or otherwise protected.

### Page 1-7 - Long Term

- 9-13** Again the general assumption is made that seedings will benefit wildlife. This is not a valid assumption unless very specific design and analysis of benefits versus impacts is done. The assumption is also made that fences will benefit wildlife. In many cases fences have very detrimental effects on wildlife.

- 9-14** We question the statement that a general policy would be implemented in which natural fires would be allowed to burn on their own in many portions of the Schell RA. This technique is of dubious value. A P-J climax may lend itself to this management, but uncontrolled burning should never be allowed in mountain brush areas, particularly where livestock grazing will occur within five to ten years after the fire.

- 9-15** Utilization, in conjunction with a period of rest, probably can exceed 50 percent on upland sites, but we question whether any recovery of riparian areas can be accomplished with this utilization or system.

## Response

- 9-10** The multiple use seeding would be seeded to provide a 70 percent grass, 30 percent forbs and shrubs vegetation mixture. Therefore, 30 percent of the vegetation would be preferred wildlife (deer) forage.

- 9-11** As noted on page 3-4, the EIS indicated that management practices other than the 750 ac. seeding would provide significant benefits to big game.

- 9-12** We appreciate your comment which essentially is supportive of riparian management in the Resource Protection Alternative.

- 9-13** See Response 9-10. Fences will benefit wildlife by helping solve the overutilization problem by properly distributing livestock. This will improve condition and trend in portions of the Schell RA. We are referring to an overall improvement in range condition through better grazing management as a result of fences and not direct impacts such as disruption of migration patterns, entanglements, etc.

- 9-14** The proposed prescribed burn policy would be subject to rather strict guidelines. Your comment suggests certain habitats important to wildlife should not be included in that policy. Your comment will be considered in the final decision.

- 9-15** Ch. 3 of the EIS agrees with your comment concerning potential impacts to riparian communities.

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**9-16** Management actions are not quantified or expressed and as such do not permit an analysis of benefits and impacts of long term management. For example, the statement, "Introductions of elk, antelope and bighorn would occur where forage is in excess of existing demand," does not specify upper limits for competing uses of the vegetative resources or establish existing demand.

Page 1-20 - Implementation, Introduction

**9-17** No timetable is provided for wildlife introductions for either short or long term management actions.

Page 1-22 - Standard Operating Procedures

Areas of Critical Environmental Concern are not specified or identified. Further standard operating procedures should include:

- 9-18**
1. The Western States Sage Grouse Guidelines should be included as a mitigating measure.
  2. The NDOW/BLM Memorandum of Understanding needs to be listed as a method for mitigating management actions.
  3. Specific guidelines should be established concerning size of protected area and procedures to protect raptor nesting sites.
  4. Key or critical wildlife habitats need to be listed as ACEC's or designated as areas where special management will be applied to maintain the areas in good or improving condition.

Pages 2-2 and 2-3 - Vegetation Types

**9-19** The narrative estimates 11,700 acres of wetlands vegetation. Table 2-1 shows only 2,600 acres in the meadow vegetation type. URA data is incomplete, and did not include individual vegetative type areas of less than 20 acres, and did not adequately identify the extent or condition of numerous mesic sites (spring sources and attendant meadows, upland meadow, stream bank meadow) which are key wildlife habitats.

## Response

**9-16** Existing use and excess forage would be determined through the monitoring program. Excess forage will be measured at the time of a request by NDOW for a specific introduction. If forage is or will be available for the size of the proposed introduction, it will be allowed, assuming it is consistent with the HMP/EA process.

**9-17** Schedules for wildlife introductions will be cooperatively developed by NDOW and BLM.

**9-18** Any specific improvements will be coordinated with NDOW prior to actual implementation in accord with the existing Memorandum of Understanding and the CRMP process. We appreciate your comments on other potential Standard Operating Procedures. They will be considered in the MFP-3 decision.

**9-19** Not all wetlands are included in the "meadow" category. Portions of wetlands were placed in a variety of categories on the Vegetation Map. The 11,700 ac figure does not include the small wetlands as you have noted.



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Page 2-4, Table 2-2

Some stream riparian areas omitted from analysis include:

<u>Stream</u>	<u>Allotment</u>	<u>Wildlife Use</u>
Chin Creek	Chin Creek	SG, MD, PA, NG
North Creek	Chin Creek	SG, MD, PA, NG
Middle Creek	Chin Creek	SG, MD, PA, NG
Sharp Creek	Chin Creek	SG, MD, NG
Schellbourne Pass Cr.	Tippett	SG, MD, PA, NG
Spring Valley Creek	Tippett, Tippett Pass	SG, MD, PA, NG, HP

\*Key: SG = Sage Grouse MD = Mule Deer PA = Pronghorn Antelope  
NG = Nongame HP = Hungarian Partridge

Stream riparian habitat is critical to wildlife and resource inventory of these areas is incomplete. analysis of grazing impacts has not been measured.

Page 2-7 - Wildlife

Riparian zones are identified as "special importance to wildlife species diversity" and as receiving disproportionately more wildlife use than any other habitat type, yet inventory of this habitat type was not completed during the URA nor draft EIS process.

Page 2-7

The list of HMP's is incomplete and should be revised to include the East Schell HMP and Kern Mountain HMP. As is the case with the other four HMP's listed in the EIS, little or no work has been accomplished on these HMP's. The ability of the BLM to develop and implement HMP's for high priority wildlife habitat should be addressed in a realistic manner.

Page 2-10 - Mule Deer

Use of crucial spring range may extend from March 1 through May 15, annually or for two and one-half months. It is doubtful that use periods of less than four weeks are experienced on crucial spring range.

"... heavy use of summer range by livestock, wildlife and wild horses. It is suspected that this heavy competition for forage is a primary factor limiting the growth of deer populations." Is there any real documentation of heavy deer use on summer ranges? This section implies this, but presents no data.

## Response

**9-20** As noted on p. 2-2, only potential fish streams on public lands surveyed in 1976 were considered as riparian areas, although it was acknowledged other riparian areas existed. We appreciate your input in this regard, but some of the areas you noted are on private lands and BLM cannot manage habitat on private land.

**9-21** The HMPs you have cited were approved over 10 years ago and no work towards implementation has been conducted on them. Therefore these HMPs need to be revised to be effective. HMPs are not direct parts of the alternatives and therefore are not part of the EIS analysis.

**9-22** The statement does not infer that all three types of grazers heavily use the area, only that together they exert enough pressure to be considered heavy use. Therefore we know of no information concerning heavy deer use of these summer ranges.

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Page 7

Page 2-10 - Pronghorn Antelope

**9-23** Pronghorn populations (1982) in Spring, Snake and Antelope Valleys remain at record high levels since aerial surveys were initiated in 1970. Significant changes in grazing use patterns (voluntary non-use, limited seasonal grazing and removal of wild horses) are factors which have probably contributed to increased pronghorn numbers.

Page 2-10 - Pronghorn Antelope

Although water distribution is not optimum, pronghorn could be reestablished in Dry Lake, Cave and White River Valleys.

Page 2-10 - Pronghorn Antelope

Key pronghorn habitat as delineated on Map 9 and described in the narrative is inadequate. More recent information has been compiled and species distribution maps are being updated.

**9-24** In the basin desert environment that is characteristic of pronghorn habitat in the Schell Resource Area, water is the key component of the habitat. Pronghorn depend more on free water in the late spring, summer, and fall especially when climatic conditions are abnormally dry. When antelope kids are nursing, the water requirement increases for does that are lactating.

During those periods when pronghorn are more dependent of water, the area within a three mile radius of that watering site is also a key component of the habitat. It is within this zone that pronghorn obtain the majority of their forage intake. Excessive livestock or feral horse concentrations at isolated watering sites could preclude pronghorn use resulting in reduced production and survival of pronghorn in those areas.

**9-25** Grazing management practices should consider these key components of pronghorn habitat and insure that water and forage are made available to meet the needs of pronghorn antelope.

Page 2-11 - Bighorn Sheep

**9-26** "Sightings have been made recently on the Schell Creek Range. The existing number of bighorn using this area is presently about 40 but reasonable numbers are estimated at 75 and the current population trend is up." Regarding this statement, according to records in the Ely office, one bighorn ram was observed by several individuals. According to the narrative in the EIS, there is an obviously viable population of

## Response

**9-23** We appreciate the additional information.

**9-24** The BLM would appreciate receiving your updated information on antelope.

**9-25** The Proposed Action included two guzzlers primarily for antelope use. The discussion in Chapter 3 considered the availability of water in addressing impacts to antelope. Other grazing management practices will consider antelope needs.

**9-26** The discussion of bighorn sheep populations in the DEIS was misleading. We are referring to the entire Schell RA and not just the Schell Creek Range. The sentence concerning bighorn numbers should read: "The existing number of bighorn using the Schell R.A. . . ."

## Comment Letter 9

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**9-26 (Cont.)** bighorn sheep in the Schell Creek Range with an upward trend. It is suspected that the description of the bighorn population was meant for the Moriah area and the sentence concerning the Schell Creek Range was misplaced in the narrative.

Page 2-11 - Sage Grouse

**9-27** The narrative states that sage grouse habitat occurs in Spring, Antelope, Snake and Hamblin Valleys and strutting grounds have been identified in Spring and Antelope Valleys. Supplemental information gathered in 1982 documented the presence of strutting grounds in all four valleys mentioned.

The narrative fails to identify that smaller isolated populations of sage grouse also occur in Cave and White River Valleys.

Table 1-2 - Sage Grouse

**9-28** It is interesting to note that 24 allotments are listed as having Problem #1 but not Problem #3. Since Problem #1 is "Improper utilization of the vegetation resource occurring on portions of the Schell RA," it would seem logical that Problem #3 would also occur, "less than good condition of many riparian and wetland areas."

Some examples of this situation where Problem #1 is listed for the allotment in Table 1-2 and Problem #3 is not, but riparian areas can be found in "less than good condition" include the following allotments: Becky Spring, Chin Creek and Tippett.

Wildlife Map

**9-29** The wildlife map showing key range and introduction proposals needs to be updated with regard to bighorn sheep introductions, key pronghorn habitat and sage grouse breeding complexes.

Page 3-1 - Determination of Significant Impacts

**9-30** It is unclear how maintaining the status quo for grazing will result in no significant impacts. In allotments or other areas determined to be currently overstocked and subsequently overgrazed, maintaining the status quo would necessarily continue to provide imp.cts. Overgrazing will maintain range in a deteriorated condition which is a serious impact on other resource values.

Page 3-2, Wildlife - Determination of Significant Impacts

**9-31** In many cases, the thresholds described have already been exceeded to arrive at existing conditions in mule deer habitat (Antelope Range and Kern Mountains), pronghorn habitat (Cave and White River Valleys)

## Response

**9-27** We appreciate the additional information.

**9-28** Please see Response 9-7. We appreciate the additional information.

**9-29** The wildlife map, as all of the EIS, was developed from data generally acquired prior to 1981. We would appreciate the updated information.

**9-30** The EIS analyzes changes brought about by various alternatives. The status quo is considered the baseline; therefore the analysis is on impacts caused by the proposed changes.

**9-31** See Response 9-30.

## Comment Letter 9

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Page 9

**9-31** | and sage grouse habitat (Antelope Range and North Spring Valley). To  
(Cont.) | apply these criteria now will not result in adequate improvement of  
wildlife habitat, but rather special management is needed.

Page 3-4 and 3-8

**9-32** | A long term consequence that permits mule deer herd growth of only  
165 deer over the next 20 years is not considered as an acceptable  
alternative by our agency.

Page 3-8

**9-33** | Fire, particularly in mountain brush communities, does not "retard  
succession" or "produce suitable browse" as stated. Burning is not a  
panacea and wildfire must be controlled in seasonal big game habitats.

While our agency personnel have other concerns relative to the  
draft EIS, we believe that those listed above summarize most of the  
significant comments. If you have any questions on this matter or need  
further input, please advise.

Sincerely,

*Willie*

William A. Molini  
Director

RPM:DE:LG:pw

cc: Region II  
Paul Bottari  
Rose Strickland

## Response

**9-32** We appreciate the comment.

**9-33** The paragraph on p. 3-8 was referring to fires in pinyon-  
juniper areas where fires burning under prescribed con-  
ditions would probably be allowed to burn.

## Comment Letter 10



United States Department of the Interior  
BUREAU OF INDIAN AFFAIRS

EASTERN NEVADA AGENCY  
Owyhee, Nevada 89332

IN REPLY REFER TO  
Land Operations  
(702 757-3133)

Mr. George Cropper  
Ely District, BLM  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. Cropper:

The Schell Resource Area Draft Grazing Environmental Impact Statement has been reviewed by Martin Urka, Land Operations Officer and William Pyott, Range Conservationist, of the Eastern Nevada Agency. The following comments are based on information provided by them.

10-1

We are interested and concerned about your policy of allowing selected wild fires to burn. We would like to know how this policy will be implemented and what criteria will be used for selecting fires not to suppress. We are especially concerned about this in relation to the Goshute Reservation.

In addition we would like to be kept informed of decisions made about land use and development adjacent to or near the Goshute Reservation. We are particularly interested in range improvements which would involve the use of herbicides or fire.

Finally we have some comments on the use of terms in the discussion of soils in Chapter 2, "Soils", p. 2 and "Poisonous Plants", p. 6. It appears that terms for saline and alkali soils are used interchangeably. Technically, soils can be saline without being alkali. Alkali soils are usually considered both saline and alkali (sodic).

10-2

A saline soil usually has a pH of 7.0 (alkaline) or slightly higher and contains soluble salts which impair plant growth. Alkali or sodic soils have a pH of 8.5 or higher with a high percentage of total exchangeable bases. Sodium accounts for 15% or more of these bases.

It would not be correct to identify all these soils as just saline, but it would be correct to call those soils which are growing greasewood both saline and alkali.

Thank you for giving us this opportunity to comment. We would appreciate being kept informed as the planning and implementation processes move ahead.

Sincerely,

ACTING Superintendent

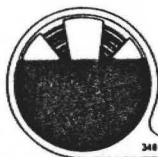
## Response

10-1 For the purposes of fire suppression, the Goshute Reservation will be treated as private land, and when threatened by a fire on Public Land, suppression action will be taken. BLM will keep the Bureau of Indian Affairs informed of management decisions that may affect the Goshute Reservation.

10-2 We appreciate the clarification.



## Comment Letter 11



**RESOURCE  
CONCEPTS  
INC.** ENGINEERING • ECONOMICS  
RESOURCE PLANNING

348 N. MINNESOTA ST. • CARSON CITY, NEVADA 89701 • (702) 843-1900

August 16, 1982

Mr. Wayne M. Lowman  
Schell Resource Area Manager  
Ely District  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

SUBJECT: N-4 State Grazing Board Comments To The Schell  
Resource Area Draft Environmental Impact Statement

Dear Mr. Lowman:

Resource Concepts, Inc., a private consulting firm based in Carson City, Nevada, submits the following comments to the Schell Resource Area Draft Environmental Impact Statement (DEIS) on behalf of the N-4 State Grazing Board. The N-4 State Grazing Board, representing the interest of the livestock permittees of the Ely BLM District is very concerned with the Bureau's lack of supportable data from which management decisions were formulated, the BLM's interpretation and application of the limited data, and the degree to which speculation is used as a basis for supporting the DEIS recommendations. The following text presents a summary of the N-4 State Grazing Board's specific concerns.

## Response

## Comment Letter 11

Mr. Wayne Lowman  
August 16, 1982  
Page 2

### SCHELL GRAZING ENVIRONMENTAL IMPACT STATEMENT FORMAL COMMENTS

#### PROPOSED ACTION P1-1

Short Term Management Actions PPI-1, 1-7.

- 11-1** Action #1. There is no sound basis to force the impacted livestock operators to take cuts ranging from 7 to 94 percent. The three year average use levels were entirely voluntary and should remain as such until monitoring data proves otherwise. To force an operator to take a cut without any data to support this action, yet only allow increases to occur with the support of monitoring data, is unfair and unacceptable.
- 11-2** To force an operator to take a cut without any data to support this action, yet only allow increases to occur with the support of monitoring data, is unfair and unacceptable.
- 11-3** Action #2. Without some method of control a horse herd will increase significantly each year. There is no mention of how the Bureau plans to maintain horse populations at the stated numbers, yet livestock numbers are controlled.
- 11-4** Action #5 P1-7. To provide 750 acres of seedings strictly for wildlife appears to be contradictory to a multiple use concept. Seedings can and should be planned to benefit all range users. Are new seedings for livestock use not required to include wildlife forage species.
- 11-5** While we would agree that these seedings will help livestock producers, it will not help all Schell area ranchers. The seedings are only planned for a limited number of allotments and for a limited number of operators. Thus, while in aggregate these seedings and improvements may offset or mitigate adverse impacts; it says nothing about the distribution of incomes and benefits. Those operators for which the seedings and/or

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## Response

- 11-1** Please see Responses 2-1 and 2-2.
- 11-2** The data used to set "present use" were actual use figures based on grazing licenses. This information therefore came directly from the ranches. The "cuts" you refer to are in active preference, not in licensed use. The reduction of active preference to levels that reflect use at the present time, appears to be reasonable.
- 11-3** As stated on p. 3-9, wild horse roundups will continue as in the past to remove horses above the numbers to be managed for. Many factors affect wild horse herd productivity, therefore roundups will occur when needed. Wild horse numbers will be allowed to expand slightly above the recommended levels before roundups occur, and roundups will reduce remaining numbers to slightly below the recommended levels. Methods to be used would be the same as in the recent past, as described on page 3-9. Consultation with CRMP, horse interest groups, and affected allottees will help develop horse herd management plans which include population controls.
- 11-4** The 750 acres of wildlife seeding would be seeded with a mixture of 1/3 shrubs, 1/3 forbs, and 1/3 grasses to provide a complex habitat for wildlife as opposed to primarily a grass mixture favored by livestock. The primary reason for this seeding is to provide forage exclusively for wildlife, especially mule deer, on summer range where forage is lacking; therefore, livestock exclusion may be justified. Multiple use management often includes setting aside small areas exclusively for a single use. While the seeding may be used by livestock, such use would be limited to the times and levels which would enhance the forage for deer use during this critical period. The limitations on livestock use would be determined through monitoring and would vary from year to year with no guarantee of any livestock use in a given year. In the worst case, livestock would be excluded, and this case was used for analysis in the DEIS.
- 11-5** The seedings you are referring to we assume are the multiple use seedings. These seedings are not mitigative in function since adverse impacts economically to ranchers in the Proposed Action are insignificant (see P. 3-10). Since range improvement funding is limited, seedings and other developments will be placed where they will do the most good from a multiple-use aspect.

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improvements are planned will possibly benefit overall. Whereas other operators will be very adversely affected with no mitigating range improvements implemented as the EIS would imply.

**11-6** Action #6 P1-7. The development of additional water sources should be the number one priority in regards to range improvements. Not only do water developments aid in livestock distribution and control, they provide a component necessary for all range users. The result is a large amount of benefit for the money expended.

**11-7** Action #7 P1-7. Although fences provide absolute control, it occurs at an extremely high cost, both in the installation and later in the maintenance costs. Fences should be considered only after other methods of control have been evaluated with the permittee (i.e., water control, salting, herding, etc.). If a fence is a necessity, close consultation and coordination with the affected operator must be maintained.

**11-8** Action #8 P1-7. To propose the fencing of riparian areas without even considering other less costly and less controversial methods is shortsighted. Researchers such as Platts, 1981; Davis, 1981; May, 1981; and Kimball and Savage, 1977; have reported on techniques other than fencing which can restore and/or protect these riparian areas.

**11-9** Action #9 P1-7. When determining utilization levels in the areas proposed for fencing, those areas under a natural irrigation system should be noted. This is necessary as plant biomass production continues as long as temperatures are warm enough to allow plant growth to occur. Utilization levels in these areas

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## Response

**11-6** We agree that water development generally provides the best return for the money expended but the amount of livestock support facilities that can be constructed is limited by available funding. This does not mean that additional spring and pipeline developments cannot be constructed through private funds or by BLM in the long term.

**11-7** Allotments that may potentially receive fences were listed in Table 1-3. Actual locations of the fences would be determined following monitoring, discussions with the permittee(s) and CRMP. Fence suggestions have already undergone the MFP-1 and MFP-2 parts of the planning process.

**11-8** None of the literature sources cited in your comment, or in the Draft EIS, have shown that riparian areas in poor condition can be improved to good or excellent without fencing. Other methods may improve riparian habitat in better condition, or maintain good or excellent condition, as noted in the Draft EIS. Since the 9.8 miles to be fenced in the Proposed Action are all in very poor shape, fencing of these is well justified. Other techniques to improve stream and riparian habitat were noted on p. 1-11 for the Resource Protection Alternative.

**11-9** Your comment is well taken. Monitoring procedures on wetland or other unique vegetation types will need to be altered somewhat from that used on normal rangelands.

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should be determined on the total year's plant production and not a one time inspection following the initial cattle use period.

**11-10** Action #10 P1-7. All proposed AMPs and grazing systems should be developed with close coordination and input from the affected permittee. Prior to implementing any grazing treatment, the economic impact to the affected permittee should be analyzed and mitigated to the extent possible.

### LONG TERM MANAGEMENT ACTIONS P1-7

**11-11** Any actions occurring in the long term should be approached in a manner similar to short term actions (i.e., consultation with the affected permittee, formulate decisions only after collecting and analyzing valid monitoring data). Analyze all alternatives before implementing any management decisions.

### P1-11, Resource Protection Alternative

**11-12** Throughout this alternative is the assumption that livestock grazing is the major factor in the degradation of this area, yet on page 3-1 under Basic Assumptions, Section 5, the document states "at this point in time it is not known whether present grazing in the Schell R.A. is utilizing vegetation at a rate above, below, or near sustained yield". Any attempt to reduce livestock numbers without sound monitoring data is wrong and discriminatory to the affected livestock operator.

### P1-21, Vegetation Monitoring

**11-13** Utilization - There should be a section provided on the utilization form to record "0" percent or no use. This would eliminate

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## Response

**11-10** AMPs and grazing systems would be implemented with close coordination and input from the affected permittee. It was assumed in the DEIS that these systems would economically benefit ranchers, and therefore would offset any minor economic costs to the ranchers. It is possible that implementation of these systems could create a financial burden to a rancher, but our interviews with present AMP allottees indicated satisfaction with no mention of "economic impact."

**11-11** We appreciate your input into the BLM planning process.

**11-12** Based on professional judgement, available data, and personal observation, it was believed by BLM and BIO/WEST personnel that some allotments in the Schell RA were being overgrazed (by as much as 50%) and that others were being undergrazed (by as much as 30%). Overall, we believe that more overutilization than underutilization is occurring, but probably only about 5% of present use for the Resource Area as a whole. In other words, it was our opinion that when all areas of the Resource Area were monitored for at least 3 years, about a 5% reduction overall would be required to achieve sustained yield utilization, acknowledging that individual allotment changes would vary considerably. In the Resource Protection Alternative, livestock use was reduced initially to provide for reasonable numbers of wildlife, as well as exclusion from certain sensitive ecosystems. For the purpose of analysis it was assumed in the case of this alternative that forage for reasonable numbers must be reserved to reach such numbers.

**11-13** Your input to the monitoring program is appreciated and the change has been made to the form.

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**11-13  
(Cont.)**

an area that is receiving no use from being classified as having slight use, which can be interpreted to mean the use levels had reached the 20 percent level when, in fact, use was 0 percent.

**11-14**

Also utilization cages should be used whenever utilization data is collected to provide proper eye calibration to annual production of key forage species.

P2-2, Vegetation Types

**11-15**

Paragraph 6. To base potential acreages of riparian vegetation on a proposed fencing plan is questionable, especially when the text admits that the 100 feet is "generally greater than the extent of the riparian vegetation". The question of riparian vegetation is a highly controversial issue. To publish admittedly inflated figures on potential riparian acreages without any data to support these claims is wrong. It would seem appropriate to use acreage figures derived during the 1976 stream survey as a starting point to estimate the potential acreages of riparian vegetation (i.e., use the existing data to determine the average width of the riparian vegetation types which occurred adjacent to the streams surveyed in 1976). Also, the use of aerial photography, with accurate planimetry, would yield more acceptable acreages, and better define the valid areas.

P2-6, Livestock Forage Condition

**11-16**

The forage condition ratings depicted in the DEIS are based on broad generalizations concerning palatability and desirability of specific plant species. The desirability of a forage species

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## Response

**11-14** In most cases, a utilization cage will be established on each representative range site in an allotment. An exception may occur where the representative range site overlaps two adjacent allotments.

**11-15** Riparian vegetation on many streams in the Schell RA is not as abundant as under an ungrazed situation. Admittedly, present riparian vegetation does not extend 100 feet on both sides of most streams, but the potential for this to occur probably exists at many streams. Also, stream miles reported do not include most of the small meanders in a stream, and fencing would not follow each curve of a stream. Therefore, the 200 foot width allows for stream meanders and is a fairly realistic method of determining riparian acreage.

**11-16** It is acknowledged that the broad generalizations concerning palatability are somewhat biased against shrub dominated communities, and that the palatability ratings result in much of the Schell RA being classified as poor livestock forage condition. The status of a plant in relation to the climax community is not a determining factor in desirability ratings. Palatability for the kind of livestock is the primary factor in deciding desirability.



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is dependent upon a variety of site specific factors such as associated plant species, breed of livestock, climatic factors, season of use, etc.

11-16  
(Cont)

Also, the criteria used to rate plants as desirable, intermediate, or least desirable requires the observer to make a judgement concerning a plant's relative position in relation to that potential or climate community. However, on page 2-6, paragraph 1 states, "since the Schell RA lacks basic soil mapping and range site delineation, range condition (the condition of a range site in relation to its potential) has not been determined". Considering the above statements regarding required criteria, it appears that correctly classifying a plant as desirable, intermediate, or least desirable would be extremely difficult at best.

P2-6, Apparent Range Trend

11-17

The fact that the text states "apparent range trend information represents only a single year's observations and thus may not reflect the actual long term trend of an area" should preclude these highly questionable figures from being used in any management decisions. Also, concerning the matter of apparent trend the State Director of Nevada, in Memorandum 4412 (N-931.5) to the Director, DSC (D-460) dated December 22, 1981, indicates that this method presents little information even for analytical purposes. The memorandum states:

4440.2--Apparent Trend

This subject should be omitted from the manual. By definition, trend is measured over time. Attempts at collecting trend data with one time recordings are often misleading and the data is of questionable value from a management and decision perspective.

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## Response

**11-17** As explained on page 3-1, the best available data on trend was used for the EIS. It is true that Apparent Range Trend Information is a questionable basis for management decisions. However, this information was used only on a basis for evaluating the impact of management actions, and not as a basis for management actions.

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### P2-6, Livestock Grazing

- 11-18** It is totally erroneous to imply that all voluntary reductions in livestock numbers are due to the improper utilization of the vegetation resource. An operations herd size can be dependent on many factors such as tax liabilities, financial position, local labor conditions, weather, and/or market conditions. Any statements concerning the reasons for voluntary reductions are purely speculative and should be deleted in the final EIS.

### P2-10, Mule Deer

- 11-19** Does any data exist to support the NDOW's theory that the condition of summer habitat is responsible for low deer numbers? If not, appropriate studies should be undertaken in an attempt to discover what is keeping deer numbers static. (Certainly, the methods used for regulating annual hunter harvests could have some effect.)

- 11-20** What criteria was used as a base to evaluate and rate deer use areas? If most of the poor areas are due to a lack of water as shown on Table 2-5 (Footnote a), why is the lack of forage and the condition of summer habitat the only factors highlighted in the text. It would seem that many areas would be improved for deer and livestock if additional waters were developed.

### P2-10, Antelope

- 11-21** The Draft EIS indicates that 51.5 percent of antelope habitat in the Schell R.A. is in poor or fair condition, yet antelope populations are at a 10 year high and increasing. These facts seem to contradict each other and leave the estimates of antelope habitat condition open to question as to their validity.

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## Response

- 11-18** We agree that voluntary reductions by operators in the Schell RA have also included factors other than overutilization. Most of your examples (financial condition, management strategy, weather, market) are important in determining the year to year, or short term, changes in livestock use. Our statement on p. 2-7 indicated that the long term reductions from preference were primarily due to overutilization and that assumption remains valid. Other long-term factors that may have played less important roles in the use reductions include the switch from sheep to cattle operations, often due to labor conditions, and adjudication of use since preference was originally established.

- 11-19** No hard data exists concerning livestock-wildlife competition in the Schell RA. The NDOW, however, has been closely monitoring the mule deer herds in the area and all indications are that competition for forage on summer ranges is a primary factor in suppressing increases in populations. The NDOW has been using restrictive hunting regulations in hopes of expanding population size. Since initiation of the regulations, deer herds which rely on Forest Service land for summer range, have responded with increased numbers. Deer herds which rely totally on BLM land for summer range, have not responded and continue to decline. Grazing is significantly less on Forest Service than BLM summer range. NDOW biologists feel the only explanation for this phenomenon is competition for forage. NDOW is initiating a study to verify the effects of summer range competition on deer populations.

- 11-20** The criteria used to determine the condition of deer use areas were those described in the following publication: Robinson, S. and W. Logan. 1979. Techniques for conducting terrestrial habitat survey in east-central Nevada. Cal-Neva Wildlife, 144-148. These techniques are quite subjective and rely heavily on the judgement of the personnel conducting the survey but it is the only data available. Summer habitat condition and lack of forage was the major reason presented by NDOW for low deer numbers, and therefore warranted a more in-depth discussion. We agree that some areas may be improved for deer and livestock with additional water development.

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P2-13, Aquatics

**11-22** Because the 1976 stream survey is the best available data, is no reason to assume it accurately reflects each of the streams and their habitat condition.

**11-23** From the figures presented in paragraph 2 (60 percent fair, 14 percent excellent, and 16 percent poor habitat condition), one would assume that the remaining 10 percent (60 + 14 + 16 = 90 percent) was in good condition. This means 84 percent of the riparian habitat is in a fair or a higher condition. Considering the length of time livestock use has occurred on the Schell R.A. (in excess of 100 years), the majority of riparian habitat seems to be in reasonably good shape. This fact should raise questions concerning the validity of charges that livestock grazing and unfenced riparian habitat cannot co-exist.

**11-24** Also, there is no indication of any long term data that could be used to support the statement, "The major reason for the fair and poor ratings were poor bank cover and bank stability, as well as low quality instream habitat problems most likely caused by livestock use".

Bank stability often is a function of the bank materials present and the regime of flow inherent in the stream in question (i.e., alluvial streams with highly fluctuating flows tend to produce instability in bed and bank materials). This, in turn, results in a situation where the establishment of plant cover is continually disrupted due to undercutting and sloughing of the bank material.

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## Response

**11-21** It was determined that distribution of permanent water sources is not adequate within antelope range in the Schell RA resulting in a poor or fair condition class rating. The recent years of above normal precipitation have resulted in additional water sources allowing populations of antelope to increase. Should an extended drought occur, populations would likely decrease significantly as these temporary water sources dry up. Also see Comment 9-23.

**11-22** Streams to be fenced were not based solely on the 1976 stream survey. Additional information from a 1981 survey, and personal observations of BLM and BIO/WEST personnel were also used to determine areas in need of fencing. We agree that the "best available data" may not accurately reflect actual condition. But without unlimited funding, much important information will never be obtained. Unfortunately, decisions need to be made and an EIS prepared; therefore, the best available information must be used to achieve the most accurate product at this time. Additional information collected in the future will undoubtedly change some of the decisions made today.

**11-23** It is a BLM management guideline to have all fish stream habitats in good or excellent condition and fair is considered less than desirable. This was prompted by Executive Order 11990. There are no "charges" in the EIS that livestock grazing and riparian habitat cannot co-exist. Page 3-8 - Aquatics noted that light grazing maintained excellent condition in one stream in the Schell RA.

**11-24** Most fair and poor rated streams in the Schell RA do not have unstable banks resulting from alluvial flows. The banks are poorly vegetated and unstable due to livestock use, or other manipulation by man, but plant cover could be established. In other words, your generalization may be correct, but has little validity for the Schell RA based on recent stream surveys and the professional judgement of BLM and BIO/WEST staff.

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### P2-15, Wild Horses

**11-25** Wild Horses. The numbers stated in Table 2-12 are extremely low as compared to reports of sightings by the permittees making use of the allotments located in the various herd units. The Board recommends frequent and intensive inventories to establish a more accurate estimate of horse numbers.

**11-26** The Draft EIS states that the wild horses are generally healthy with the well-being of the herds attributed to an adequate supply of forage cover, water, and solitude yet 62 percent of the allotments that horses occur on have utilization problems. This fact seems to contradict the statement concerning the adequacy of forage amounts for grazing on at least 62 percent of their range.

**11-27** The statement indicating, "Illegal removal may also occur" should be deleted unless supported by specific documentation as this statement only tends to inflame an already emotional issue.

### P2-21, Ranching Community

**11-28** Paragraph 6 - The ranchers' justification for the cause of reduced grazing levels (counter productive management of public lands, economic conditions, social changes, etc.) should be included on P2-6 under the livestock grazing discussion.

### P3-1, Basic Assumptions

**11-29** Assumption #4. To extrapolate already questionable data on trend could increase or decrease the perceived impacts and

## Response

**11-25** Wild horse counts were made by helicopter, recognized as the most accurate method available. Seasonal increases and decreases in horse numbers are likely as the animals use various parts of the Schell RA and adjoining areas of public and private lands. BLM acknowledges that this constantly changing wild horse population is difficult to measure but funding restraints limit the frequency of inventories.

**11-26** The statement in the DEIS was misleading. It should have said that the Schell RA has a very small wild horse herd when compared to most other areas in Nevada. They are generally found in small bands and have access to considerable areas of public land. Their mobility allows them accessibility to adequate water, cover and forage primarily because they are not restricted to limited resources in small areas.

**11-27** In the past, there have been several documented instances of actions in violation of the Wild Horse and Burro Act.

**11-28** The ranchers' perceptions of what has been the cause of livestock use reductions were considered in the Social Section as their opinion. We have no information to confirm these assumptions; therefore, the perceptions were not used in the Livestock Grazing Section.

**11-29** The best available valid data was used in the EIS analysis. As noted in Response 11-17, Apparent Trend Data was used only as a basis for evaluating the impact of management actions. While not quantified, relative estimates of vegetative composition, vigor, and reproduction are important determinants of Apparent Trend. Analysis of the impact of a management action was based on the expected (literature documented) effects of the management actions on vegetative composition, vigor, and reproduction. Significance of the effect was based on the area that would be affected.

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11-29  
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allow erroneous conclusions to be made. Only valid data which is available and quantifiable should be used to derive estimates of impact.

11-30

Assumption #5. To assume a 10 percent reduction in livestock/wild horse numbers will end the utilization problems is questionable, at best. The utilization problems can be tied most generally to inadequate distribution and not excessive numbers. Without additional water developments, fencing, and other management techniques above the proposed levels, little improvement can be expected in the problem areas.

P3-2, Proposed Action

11-31

Soils. The assumption under this section is that grazing use levels are excessive and need reducing. Yet on page 3-1 under basic assumptions, section 5, the document states "at this point in time it is not known whether present grazing in the Schell R.A. is utilizing vegetation at a rate above, below, or near sustained yield." To continue implying grazing use is excessive despite the above statement is wrong.

P3-3, Vegetation

11-32

Again, this section of the text is permeated with the charge that overgrazing by domestic livestock is the root of all the problems when, in fact, no valid data exist to substantiate this charge. Both wildlife and wild horses graze the Schell R.A. and without doubt impact the vegetation to some degree. In the absence of data used to quantify this impact, it is improper to attribute any utilization problems on only one user (domestic livestock).

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## Response

11-30

See Response 11-12. We agree that utilization problems are usually due to distribution, which means that livestock concentrate in certain areas, especially near water and do not utilize forage that is too far away from water. This causes overutilization of the areas around water because of excessive numbers in the area and underutilization in the areas away from water. By reducing livestock, the favored areas will improve due to reduced grazing pressure. Therefore, we disagree with the portion of your statement that infers that reducing livestock numbers would not improve utilization. Additional water developments and fences would distribute livestock more evenly and could increase the number of livestock that can be grazed in an allotment, and some of these developments were planned under this alternative.

11-31

See Response 11-12.

11-32

There are probably isolated instances of overgrazing caused by wildlife and wild horses; however, livestock comprise the vast majority of grazers on the Schell RA and most overutilization is attributable to them. Adjustments in wild horse use are proposed in allotments where they occur and monitoring shows the forage is being overutilized.



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Grazing systems generally only control domestic livestock, and to ignore the impact the other range users might have on the rested pastures or riparian areas is wrong.

**11-33**

The purpose of the monitoring program outlined on pages 1-20 and 1-21 is to accurately determine the impacts of the present grazing practices now affecting the vegetation resource of the Schell R.A. In this light, any or all preconceived judgements concerning livestock, wild horse, and wildlife use are purely subjective and should be eliminated in the final EIS.

P3-3, Livestock Grazing

Any reductions, "paper" or otherwise, without data to support this action is completely unacceptable.

**11-34**

To assume a 10 percent reduction on each allotment listed as having utilization problems, completely ignores the fact that each allotment will be analyzed on a case-by-case basis. It also implies a simple reduction will solve the majority of utilization problems, thereby ignoring management actions such as increased water developments, salting practices, herding, fencing, changes in season of use, etc., that can be used to improve distribution thus eliminating possible utilization problems.

**11-35**

The short term management actions indicate that AUM levels would rise approximately 1 percent. This would mean that the short term action would produce an approximate 47 percent overall reduction from preference levels. A very significant impact by anyone's standard.

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## Response

**11-33** The purpose of the monitoring program is to accurately evaluate the forage resource, its use and measures necessary to achieve management objectives. Present use figures were based on rancher input, NDOW input and information from the Schell URA and MFP documents. Also see Response 3-3.

**11-34** See Responses 11-12 and 11-30.

**11-35** This economic impact was discussed on p. 3-10 and in Response 2-2.

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11-36

The long term action would result in an approximate 44 percent reduction from preference, thus, a very significant negative impact. The Paradise-Denio EIS (1981) estimated current AUM values in Nevada to range between \$25 and \$60 per AUM (Paradise-Denio EIS, 1981). This, then, represents a loss in rancher wealth for each AUM removed. That is, each Federal AUM removed would directly impact rancher wealth from \$25 to \$60/AUM, depending upon which estimate is used.

P3-4, Wildlife

11-37

Without data to support the hypothesis that the lack of summer range is retarding deer population increases, it is wrong to assume a seeding will solve the problem or even improve it, if the problem does, in fact, exist.

11-38

Referring to Table 2-5 (Footnote a) states, "most poor areas (mule deer habitat conditions) due to lack of water". To now state that the cumulative impact of water developments would be insignificant appears to be contradictory. Also, water developments can be designed and constructed to reduce spatial competition between livestock and wildlife.

11-39

Paragraph 3 - Once again, livestock are singled out as being responsible for perceived overgrazing problems with no mention of the impacts from wild horses or wildlife. The fact that fences can cause mortality in wildlife concentration areas is discussed here but ignored when discussing the fencing of riparian areas which are also areas of concentration for wildlife.

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## Response

11-36

Current estimates of the value of permits for similar range-land range between \$15 and \$25 per AUM. Thus, the loss of the suspended non-use at a maximum may lead to reductions of a total of \$3.14 million in rancher wealth, assuming a discount rate of 10 percent. This change is less than 5 percent of the current value of agricultural land in the region. However, it should be noted that lenders, particularly the Production Credit Association, have been reluctant to loan money based on BLM grazing permit value in several areas of the Intermountain West. Thus the real value of wealth is uncertain at this time. It was noted on page 3-10 in the DEIS that rancher wealth could decline due to this proposal. But as indicated on p. 3-13 and in Krannich et al. (1982), most ranchers interviewed did not consider this a threat to themselves.

The justification for using suspended non-use in the future is that the availability of monitoring data will quantify available forage and therefore use. There is, therefore, no need for preference levels above these figures. The use can be increased as improvements are developed or as range condition and trend improves.

11-37

See Response 11-19.

11-38

For water developments to have a significant beneficial impact requires a 20 percent increase in existing deer numbers (see p. 3-2). This threshold would not be met by the proposed water developments.

11-39

As noted on p. 3-4, the problem with wildlife mortality due to fences would be insignificant.

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**11-40** Paragraph 5 - With respect to the discussion on seasons of use, the allowable use levels used by the BLM should ensure that adequate forage remains for deer consumption in these areas. If monitoring data indicates that a change is necessary, the present BLM policy mandating the protection of wildlife habitat would be adequate to provide for the deer populations in these areas.

**11-41** Paragraph 8 - Grazing use can also retard succession and produce suitable browse.

**11-42** Paragraph 9 - There is no hard data to support the statement that deer herds on the Chin Creek, Tippett, Pleasant Valley, and Wilson Creek Units are at critically low levels due to livestock use. The statement, as discussed in Chapter 2, "These populations are at critically low levels and probably would remain so unless there is a significant decrease in livestock use" should be deleted.

P3-8, Upland Game And Waterfowl

**11-43** If fencing would improve 9700 acres of wetland vegetation, but little improvement of wildlife habitat could be expected due to the impacts of livestock grazing, then what is the justification for fencing?

P3-8, Aquatics

**11-44** To make a blanket statement that cattle and sheep grazing around streams have drastic effects on fishery habitats and fish populations is incorrect. Studies by Davis, 1981; Kimball and Savage, 1971; May, 1981; and Platts, 1981; etc., have shown that

## Response

**11-40** It should have been noted on p. 3-4 that this analysis was a "worst case" analysis.

**11-41** We agree.

**11-42** See Response 11-19.

**11-43** The fencing would be used to assure that livestock grazing does not exceed sustained yield.

**11-44** The references cited on p. 3-8 should be consulted and compared with the sources you noted. All of these references agree that livestock can and do have drastic effects on stream systems, but impacts vary depending on a variety of conditions. Also see Responses 11-8 and 11-23.

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the effects of grazing on streams vary drastically in relation to class of livestock, type of vegetation present, management practices, grazing systems, stocking rates, stream characteristics, and most important, utilization levels.

To state that fencing is the only sure way to improve stream habitat ignores the findings of the before mentioned authors and allows erroneous conclusions to be drawn by the readers of this document. It should be changed to read, "planned grazing systems, herding, water developments, fencing, etc., are all management tools that can be used to protect and improve stream habitat".

Paragraph 2 - The lack of detailed data is not a valid reason to assume that streams in allotments with increased livestock use will degrade from present levels or that streams in allotments with decreased grazing will remain in existing condition or improve slightly. The impacts to streams are dependent on many factors and would vary in relation to the type of grazing management applied to each allotment as well as the proposed livestock numbers. At this point in time, the impacts are unknown and the text should state this fact.

11-45

Over the long and short term, livestock numbers will only increase if monitoring data indicates an increase is warranted. This is possible only if the plant and soil resources are not being damaged. The DEIS suggest fencing is the only alternative to improve stream habitat in the short run, but over the long term, sustained yield utilization, grazing systems, and AMPs will help alleviate many adverse problems. This analysis appears to be questionable, as the above mentioned methods could also be used in the short run.

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## Response

11-45 Please refer to Responses 11-8 and 11-44. The impacts determined due to increased or decreased use were based on a number of studies as cited in the Draft EIS. No other management actions were proposed that may have mitigated or reduced the potential impacts. Again, fencing was proposed to alleviate severe problems by improving poor habitat to good or excellent. The management techniques you noted would help reduce degradation of unfenced riparian areas only after a number of years of implementation. Even at that, the improvement projected would not be sufficient to raise poor habitat quality to good or excellent.

**Comment Letter 11**

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P3-9, Wild Horses

**11-46**

Other than the statement "Periodic roundups would be required to maintain present use levels", no mention is made of proposed round-up areas or schedules for gathering. At what point in the horse population increase (5 percent, 25 percent, 50 percent) would a round-up be conducted?

P3-13, Ranching Community

**11-47**

The proposed action would have a significant negative impact to the ranchers who receive reductions ranging from 7 percent to 94 percent. The fact that the present AUM reductions were voluntary but now are proposed to be used as a basis for suspended non-use will only widen the feeling of distrust experienced by most ranchers.

P3-16, Resource Protection Alternative

**11-48**

The entire premise throughout this alternative is that reduced livestock use would solve the majority of problems identified in the Schell R.A. when, in fact, only minimal site specific data is available which supports that theory.

P3-25, Graze At Preference Alternative

**11-49**

To analyze perceived impacts and predict resource deterioration without any supporting data would seem a waste of time. When reviewing this and the other alternatives, it appears the BLM have a preconceived figure with respect to reductions they plan to initiate in three years. If so, then the proposed monitoring plan would appear to be nothing more than a formality.

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**Response**

**11-46** See Response 11-3.

**11-47** Rancher interviews as noted on p. 3-13 did not indicate that such negative impacts would result. But as also noted on p. 3-13, they did suggest that dissatisfaction over reductions in preference levels would result in increased conflict.

**11-48** See Responses 11-12 and 11-32.

**11-49** No prejudging of monitoring is intended. If, when sufficient monitoring data are available, an adjustment up or down is needed, it will be pursued. Any actual adjustment in use will be based on monitoring data.



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P3-35, No Livestock Grazing

**11-50** This alternative is unreasonable and impossible to implement if one considers current BLM policy and regulations.

COMMENTS REGARDING ECONOMIC IMPLICATIONS OF THE PROPOSED ACTION AND ALTERNATIVES PRESENTED IN THE DEIS

**11-51** 1) The "Graze at preference alternative" is completely impractical and goes against the basic principles of ranch management and ranch economics. This point is brought out in the EIS to some degree on the bottom of Page 3-32, but not nearly strongly enough.

A relevant question at this point is why have Schell R.A. ranchers typically grazed at below licensed use? Several reasons are obvious:

**11-52** a) Optimal stocking rates are determined by the interaction of production costs, beef prices, and most importantly, the seasonal mix of forage availability. While the number of BLM AUMs available is a factor, it is not the only one. The obvious answer, given the fact that ranchers in the Schell RA are grazing below authorized use, is that spring, summer, and fall grazing resources (when BLM is typically available in the District) are not the limiting factors of livestock production for most of the Schell ranchers. It would appear that winter feed or early spring grazing is the limiting forage season for livestock production on the Schell. Ranchers have adjusted their seasonal level of BLM use to fit their ranch management and ranch economic needs. To assume that BLM policy could dictate

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## Response

**11-50** We appreciate your comment.

**11-51** We appreciate your comment.

**11-52** We appreciate the additional data.

## Comment Letter 11

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that "you will graze at active preference" would go against the principles of profit maximization for the ranch firms.

11-53

- b) To increase cow numbers requires capital investment in breeding livestock, ranch equipment, labor, and supplemental feeds. In fact, the historical use of BLM forage on the Schell should theoretically represent the "profit maximizing" level of use that ranchers have established through experience. The increased level of short-term grazing called for under the "graze at preference alternative" would represent a higher than optimal level of ranch investment.

The above points are basic to the principles of micro-economic theory. Why is an EIS alternative which is so economically unsound and physically impractical even considered? It is almost as if BLM felt livestock reductions may not be justified at current stocking levels and that this ridiculous alternative was proposed as a safeguard.

11-54

- 2) The economic analyses contained within the Schell EIS fail to recognize the time value of money. Once again, the same mistake has been made. Long term benefits are estimated and treated equivalent to short term impacts. That is, it is not recognized that even given that range improvement may, in the long run, increase livestock grazing, this benefit cannot be directly compared to short-run impacts (reductions in livestock grazing) without discounting long run benefits and short run impacts to present value. It is the present value of various income streams under each alternative that must be compared. To estimate the increased

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## Response

**11-53** As stated on p. 3-32 and 3-34, we noted that most ranchers probably would not increase use to preference levels. But this alternative assumed that preference use would occur and analyzed the impacts of that occurrence.

**11-54** Since the EIS is not a benefit-cost analysis, but rather a projection of the time stream of economic activity, there is no need to discount the future income streams. We recognize that a benefit/cost analysis would indeed require such discounting to compare present values of future incomes.

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grazing capacity and ranch income that may result from range improvements say 20 years in the future and compare this to short run impacts without using the tool of discounting is inappropriate.

This point would be even more important if any of the proposed management alternatives estimated short run or long run benefit to the livestock industry. However, this is not the case. Consider the summary of estimated ranch economic impacts outlined in Summary Table 1 of the EIS. The "proposed action" is estimated to (perhaps) slightly benefit sheep operators in the long term and the "Graze at preference alternative" is estimated to probably increase net income in the long term. All alternatives show either no impact or very detrimental impacts in the short run to the livestock industry. It is obvious then that BLM plans to manage for recreation, wildlife, wild horses, and cultural resources at the direct and very real expense of the livestock industry.

11-55

- 3) Under the "Graze At Preference Alternative", it is indicated that AUMs levels will increase in the long term (pp5 and 3-32). This is not what Summary Figure 1 shows. In Figure 1 under the "Graze At Preference Alternative", AUMs never again reach present use. There could therefore be no "probable" economic benefit as is suggested by Summary Table 1.

11-56

- 4) On page 1-12, Table 1-4, cost comparisons for implementation of the five alternatives considered for the Schell R.A. are presented. It should be noted that the loss in grazing fee income to the BLM is just as real a cost as

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## Response

- 11-55** As explained on pages 3-29 and 3-30, and as shown in Summary Figure 1, livestock numbers would decrease in the short term, and gradually increase in the long term from short term levels, but never reach present use (last 3 yr. average) levels. As noted on p. 3-32 -"economic improvement is expected from the short term, although probably not to a significant degree." Significance, as explained on p. 3-2, was a 5% change in net ranch income. Therefore, no "probable" economic benefit would accrue as you noted, and as noted on Summary Table 1.

- 11-56** Funding levels in Table 1-4 were determined based on projected future funding levels from a variety of sources, including range funds derived from grazing fees. The values are undiscounted totals for annual expenditures. Differences between alternatives reflect differences in grazing fee income, since other funding sources were considered to remain constant. It was assumed that the same proportion of the grazing fees would be returned to the Schell RA as occurred in the last few years. While there would be an additional loss to the general public treasury, it certainly would be insignificant. Table 1-4 was changed (see Changes Section) to reflect a more consistent definition of the values and assumptions. The loss of livestock income is estimated for each alternative (see tables in Chapter 3).

**Comment Letter 11**

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**11-56  
(Cont.)**

monies for fencing, seeding, wildlife guzzlers, etc., and should thus be included in cost comparisons. Also, the loss in livestock production income should be included. As outlined by BLM in their range improvement economic analysis directives, the private land lease rate provides an estimate of what this value per AUM would be. Table 1 outlines our estimate of what this loss in revenue would be for each of the alternatives considered. In addition, it should be emphasized that this loss in grazing fee income and livestock production income would represent an annual loss not just a one-time cost.

As can be seen from Table 1-4 of the EIS, the No Livestock Grazing Alternative is estimated to be the least expensive alternative to implement. However, when the income lost in grazing fees and income lost in livestock production are added, this alternative becomes the most expensive.

**11-57**

- 5) Page 3-32 of the EIS states, ".....if the above problems could be overcome, rancher incomes would increase drastically". This sentence indicates significant short term positive benefits under the "Graze At Preference Alternative". This conclusion relies on the assumption that ranchers will increase herd sizes. However, increasing herd sizes is an investment decision which must be made by each individual rancher. Why would a rancher increase herd size in the short term when in the Schell EIS it is layed out so well that the rancher is to be drastically cut in 3 years? It is possible, if the "Graze At Preference Alternative" were implemented, that additional AUMs supplied in the short run would go unused -- thus no benefit. This point has not been addressed in the EIS and should be prior to any management decision being made concerning this alternative.

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**Response**

**11-57** See Response 11-53.

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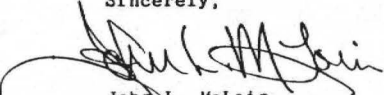
In conclusion, the N-4 State Grazing Board is very concerned with the amount of unsupported speculation that is used to support the DEIS recommendation. The Board is unaware of any reliable trend data, range condition information, forage utilization data, or site specific data documenting negative impacts to wildlife due to the actions of livestock.

Literature, when cited, typically presents information supportive of the proposed recommendations, as opposed to being objective in presenting the "pros" and "cons" of the recommendation.

When one considers all of those factors, the question arises as to how realistic management decisions can be formulated and the benefits of the proposed action be projected when there is such an obvious lack of reliable data.

The N-4 State Grazing Board appreciates the opportunity to comment on the DEIS and hopes that serious consideration will be given to these comments when preparing the final EIS.

Sincerely,



John L. McLain  
Certified Range Management Consultant

JLM:db

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## Response



Table 1. Loss of grazing fee income and livestock production income for each of the proposed alternatives, short term.

Proposed Action		Resource Protection	Graze at Preference	No Livestock Grazing	No Action
AUMs removed over 3 year average use	0 <sup>a</sup>	22,156	0 <sup>a</sup>	136,669	0
Grazing fee Income lost @ \$1.86/AUM	0	41,210	0	254,204	0
Livestock production Income lost @ \$6.29/AUM <sup>b</sup>	0	139,361	0	859,648	0
Short term costs from Table 1-4 of EIS	775,000	625,000	942,300	175,000	400,000
Total Short term costs	775,000	805,571	942,300	1,288,852	400,000

<sup>a</sup>/Because of the initial 3 years proposed forage increase and then decrease, the easiest assumption is that in the short term (say 10 years) no change in grazing fee or livestock income would occur.

<sup>b</sup>/\$6.29/AUM is the average price paid per AUM for pasturing cattle on non-irrigated rangelands in Nevada during 1981 (Fransten, 1982). As outlined in BLM's economic directives on valuing forage for range improvements, this value should approximate the value of an AUM of grazing.

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## Comment Letter 11

### LITERATURE CITED

Davis, Jerry W. 1981. Livestock vs. Riparian Habitat Management - There Are Solutions. In Proc Symp. on Wildlife Livestock Relationships. Department of Wildlife Resources, University of Idaho, Coeur d'Alene, Idaho, 614 pp.

Fransten, Ed. USFS Range Economist, Washington, D.C., personal communication, February, 1982.

Kimball, J. and F. Savage. 1977. Diamond Fork Aquatic and Range Habitat Improvements. U.S. Forest Service, Intermountain Region, Ogden, Utah, 19 pp.

May, Bruce E. 1981. Practices For Livestock Grazing And Aquatic Habitat Protection On Western Rangelands. In Proc Symp. on Wildlife-Livestock Relationships, Department of Wildlife Resources, University of Idaho, Coeur d'Alene, Idaho, 614 pp.

Platts, William S. 1981. Sheep and Cattle Grazing Strategies On Riparian-Stream Environments. In Proc. Symp. on Wildlife-Livestock Relationships, Department of Wildlife Resources, University of Idaho, Coeur d'Alene, Idaho, 614 pp.

U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Winnemucca, Nevada. 1981. Paradise-Denio Grazing Environmental Impact Statement, p.2-26.

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## Response

## Comment Letter 12

Brent Eldridge, Chairman  
 Archie Robison, Member  
 Jay Henriod, Member

P. O. Box 1002  
 (702) 289-8841

### Board of County Commissioners

WHITE PINE COUNTY  
 ELY, NEVADA 89301

August 18, 1982

Merrill DeSpain, D.M.  
 Bureau of Land Management  
 Ely District Office  
 Star Route 5, Box 1  
 Ely, Nevada 89301

Dear Mr. DeSpain:

The following are the Commission's comments regarding Schell Draft EIS.

12-1

1. Fencing of riparian is a Band-Aid approach - Fencing should be planned as an integral part of a management plan resulting in benefit to all users.

12-2

2. Three-year average for initial grazing level should be very flexible to allow authorized officer discretion to implement obviously needed adjustments pending more formal monitoring results.

12-3

3. Effects of agriculture on local economy are not accurately portrayed. Gross product and agriculture is a major contributor to the economy even though net earnings may only account for 2% of local income. Gross income, as well as net should be considered in assessing economic impact.

Thank you for the opportunity to comment on this matter.

Sincerely,



BRENT ELDRIDGE,  
 Chairman

BE/rw

## Response

12-1 See Responses 11-8, 11-44, and 11-45.

12-2 See Responses 2-1 and 2-2.

12-3 The income changes used for the regional impact analysis for the livestock sector are gross receipts from exports, rather than net income to ranchers. All gross output values are total sales (gross revenues), rather than net incomes. The value added amounts are equivalent to net income plus payments to hired labor and returns to borrowed capital.

## Comment Letter 13



419 Railroad Street - Elko, Nevada 89601-3783  
(702) 738-9214

August 17, 1982

George Cropper, Acting District Manager  
Bureau of Land Management  
Ely District Office  
Star Route 5, Box 1  
Ely, NV 89301

Dear Mr. Cropper:

The following comments are made on behalf of the Nevada Cattlemen's Association on the Draft Environmental Impact Statement Proposed Domestic Livestock Grazing Management Program for the Schell Resource Area.

### Comments on the Proposed Action

1) One of our major concerns with the proposed action is the proposal to use the average a.u.m. use between 1977-79 as the present use. Using this average will unfairly reduce permits that took voluntary non-use during this period. Many factors could effect the operator's decision to take non-use other than the ability of the range to handle the cattle. The current use, unless circumstances other than range conditions influenced non-use last year, should be used as a starting point and future adjustments should be made relying upon monitoring data.

2) Wild horses should be inventoried considering adjustments indicated as being needed in the University of Minnesota census study report. Any areas that have horses in excess of the 1971 levels should be reduced to at least this level. In no case should livestock numbers be reduced to make room for wild horse numbers in excess of the 1971 levels.

3) Wildlife habitat management levels should be determined at a local level which includes input from other forage users.

4) The livestock operators in this area feel there is more than 4,000 acres which would benefit from multiple-use seedings. The additional forage available from these seedings should not be allocated on an arbitrary percentage basis, but on what forage sources are available. The BLM should plan for more acreage to be seeded.

Affiliate NATIONAL CATTLEMEN'S ASSOCIATION

## Response

**13-1** See Responses 2-1 and 2-2.

**13-2** Wild horse inventory procedures were discussed in Response 11-3. The Proposed Action would manage wild horses at existing levels. Livestock numbers have not been reduced to accommodate wild horses in any of the alternatives.

**13-3** See Response 9-8.

**13-4** Seeding acreage is limited by available funding. Multiple use seedings would be composed of 70% grasses and 30% forbs and shrubs, and the additional AUMs would be divided into 70 percent for livestock and 30 percent for wildlife.

13-1

13-2

13-3

13-4

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Clover Valley, Wells

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Elio

## Comment Letter 13

George Cropper, Acting District Manager  
August 17, 1982  
Page 2

- 13-5** 5) Seeding and fencing 750 acres specifically for wildlife is not multiple use management. We do not restrict wildlife from using our private lands or public allotments and such restricted use shouldn't be made specifically for wildlife.
- 13-6** 6) The development of 10 springs, 10 miles of pipeline, and 2 miles of fence to aid in the distribution of livestock is too little. Improving the distribution of livestock and wildlife is probably the most beneficial management technique the BLM could use to improve forage conditions in those areas felt to be over grazed. Development of water improvements and pipelines to improve distribution should receive much higher priority. Much more potential exists for these improvements which could help solve many problems.
- 13-7** 7) Development of fences should only be planned with the livestock operator who best knows how his livestock use an allotment.
- 13-8** 8) Fencing of riparian areas should only be used as a last resort. There are other proven methods to improve riparian habitat, that are not as costly, which can result in the same end result. Livestock should not be used as a "scape goat" for degraded riparian habitats. Documentation should be made to determine the actual cause of any deteriorated riparian habitats and alternatives should be developed to resolve the condition.
- 13-9** 9) Utilization of these wetlands proposed to be fenced should be determined as are irrigated meadows. Total annual production should be considered.
- 13-10** 10) Cook book grazing systems don't always fit the particular situation that exists on certain allotments or operations. Often times the livestock operator has developed a system that he feels works best. We strongly encourage the BLM to work closely with the livestock operators when developing grazing systems or allotment management plans.

### Long Term

- 13-11** Our comments on the short term management actions also pertain to the long term proposals. However, as our previous comments indicate, we feel improvements should be speeded up in the short term and maximized over the long term. To support that elk, antelope, and bighorn sheep be introduced to utilize forage in excess of demand leads us to believe that livestock will not be considered for additional forage that may become available. This statement should be clarified.

## Response

- 13-5** See Response 11-4.
- 13-6** See Response 11-6.
- 13-7** See Response 11-7.
- 13-8** See Responses 11-8, 11-44, and 11-45.
- 13-9** See Response 11-9.
- 13-10** Grazing systems or AMPs will be developed in close coordination with the affected operators.
- 13-11** Elk, antelope and bighorn sheep may be introduced in some areas if forage is available. The type of forage and specific circumstances will determine forage allocation. See Response 9-16.



## Comment Letter 13

George Cropper, Acting District Manager  
August 17, 1982  
Page 3

### Selective Management

**13-12** We object to the use of range condition to categorize allotments. The Ely District doesn't have reliable data from monitoring studies to show what the actual range condition is at this time, and won't, until several years down the road. The 1979 range survey results are highly questionable and cannot be considered as a reliable basis to formulate forage condition ratings from. We encourage the BLM to remove this criteria from their categorization process.

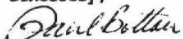
### Vegetative Monitoring

**13-13** Utilization should be determined through use of cages rather than visually as indicated. Actual use of wild horses and wildlife should be determined from the most accurate methods available.

### Summary

We object to the BLM's attempts to use data from the 1979 range survey to make management decisions in this Environmental Impact Statement from. We also object to the statements indicating that widespread overgrazing by livestock is occurring even though there isn't documentation that this is in fact true. Long-term monitoring of the range trend will provide the necessary information from which these decisions can be made. Once this data is available it will provide the basis from which all decisions can be made. We strongly encourage the suggested changes be made in the Final Draft.

Sincerely,



Paul Bottari, Executive Secretary  
Nevada Cattlemen's Association

## Response

**13-12** Thank you for your comment. It will be considered for development of the selective management criteria in the Schell RA.

**13-13** See Responses 11-14 and 11-25.

## Comment Letter 14



## SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO: \_\_\_\_\_

 GREAT BASIN GROUP  
 P.O. Box 8096  
 University Station  
 Reno, Nevada 89507

 LAS VEGAS GROUP  
 P.O. Box 19777  
 Las Vegas, Nevada 89119

August 16, 1982

Merrill DeSpain, Manager  
 BLM/Ely District  
 Star Route 5, Box 1  
 Ely, NV 89301

Dear Manager DeSpain,

Thank you for the opportunity to comment on the draft Schell Grazing Environmental Impact Statement. I am commenting on behalf of the Toiyabe Chapter of the Sierra Club and the Nevada Outdoor Recreation Association. We are pleased to submit the following comments:

- 14-1** Summary. The summary tables were somewhat confusing. We could not determine, for instance, if the 23% improvement in range condition listed for the Proposed Action means that 77% would continue to deteriorate, or if sustained yield is a major goal of the Resource Protection Alternative, but not the Proposed Action. Also, although the DEIS is supposed to use the MFP-II recommendations, it was not at all clear that BLM planning is incorporated into the DEIS. Is the Proposed Action the area manager's MFP-II recommendations?
- 14-2** Chapter I. We are unconvinced that the major innovation of this DEIS, placing the difference between licensed use and past 3-year's average use into suspended non-use will either improve range management or resolve resource problems. We can see a problem with this process penalizing a good operator who has reduced cattle use on an allotment due to poor range condition and reward the over-capacity grazing of less long-sighted ranchers. More rationale is needed for this proposal.
- 14-3** What is BLM trying to accomplish with the Proposed Action? It appears that BLM proposes to spend over \$3,000,000 just to maintain the last 3-years average use. We feel the Proposed Action does not go far enough to improve range conditions or to resolve resource conflicts. The range improvement program appears reasonably conservative; fencing 9.8 miles of riparian stream habitat is good, but not enough; fencing 15 miles to protect 9,700 acres of wetlands is good, but not enough; and placing 19 allotments into custodial management is not at all justified. Conservationists strictly oppose the writing-off of any lands as incapable of being improved and managed properly.
- 14-4**
- 14-5**

To explore, enjoy, and protect the natural mountain scene...

## Response

- 14-1** In the worse case, only 23% of the Schell RA would be improved for livestock forage condition since this is the amount in the Schell RA presently in a downward trend. In all likelihood, more of the Schell RA would be improved, the 23% is the lowest amount that might be improved. Sustained yield utilization is a goal of all alternatives except No Action.
- 14-2** As noted on p. 1-1, the Proposed Action is that portion of the area managers MFP-2 recommendations that affect grazing.
- 14-3** Suspended non-use is an indirect affect of the proposal to go to a sustained yield grazing system as determined by monitoring. Once monitoring data have set the level of use in a given allotment, increases to that use could only occur if future monitoring shows additional forage is available. Therefore, the present preference levels have no real meaning as they would never be attained in most allotments. This system will only penalize a "good operator" for the 1-3 year period before monitoring data becomes available. Also see Responses 2-1 and 2-2.
- 14-4** Range improvements are limited by available funds. Also see Response 3-2.
- 14-5** Placing an allotment into a Custodial category does not say it cannot be improved. Current management of the allotment is sufficient to maintain the resource in its present condition. Neither more intensive management nor range improvements will significantly improve the allotment. Therefore, it will be properly managed within the capability of the resources it presently possesses.

## Comment Letter 14

p. 2 SIERRA CLUB

- 14-6** | The Resource Protection alternative goal of protecting all areas from overgrazing should be required for all the alternatives and BLM management actions. Does this statement mean overgrazing will be allowed in the Proposed Action?
- 14-7** | The Sierra Club does not support the reduction of livestock or wild horses to increase wildlife to reasonable numbers. We support reducing overgrazing by all animals, improving range condition and then increasing all animals proportionately. We believe properly managed range can accommodate livestock preference, reasonable wildlife numbers and viable wild horse herds.
- 14-8** | Fencing 31.7 miles of stream riparian habitat is better than that proposed in the Proposed Action, but probably not enough. The same is true of the fencing of 11,700 acres of wetlands. We support reintroduction of big game species when the forage is available. We strongly support the proposed two month rest for allotments in the Spring in those without AMPs or grazing systems.
- 14-9** | We feel the Grazing At Preference alternative, if implemented would be very disruptive to the livestock industry starting a boom which would soon bust and penalizing good operators who do not exceed carrying capacity. Ofcourse this alternative would institutionalize overgrazing in the Schell RA, also. If this really what the ranchers want? Obviously, BLM cannot maintain big game at present levels if livestock levels are increased to preference, so the analysis is also faulty.
- 14-10** | We approve of the benefits to the land resource of the No Grazing alternative, but feel that resource conflicts would be better resolved if BLM follows the principles of multiple use and sustained yield.
- We highly suspect the No Action alternative to be the real proposed action!  
Implementation
- 14-11** | We greatly doubt whether the monitoring data proposed to be collected and so heavily relied upon to base management decisions will ever be used to reduce livestock AUMs. If monitoring data shows reductions are necessary, the data will be challenged. (See p.3-22, ranching community comments on using "political influence and legal avenues to protect its interests and avoid losses.") We wonder if BLM believes that the best data is data not yet collected!
- CRMP. The emphasis on CRMP is too optimistic as effective 100% participation from all interests will be impossible to achieve and sustain. CRMP will not ultimately rescue BLM from having to make hard management decisions eventually.

## Response

- 14-6** | Managing on a sustained yield basis, as in either the Proposed Action or Resource Protection alternative, does not allow for overgrazing.
- 14-7** | We appreciate your comment.
- 14-8** | The 31.7 miles of stream fencing, and 11,700 ac of wetlands to be fenced, include all the known fishable streams in less than good condition and all the known major wetlands.
- 14-9** | We appreciate your comment.
- 14-10** | Refer to pages 3-30 and 3-31 where wildlife impacts are discussed.
- 14-11** | We appreciate your comment on the BLM planning process.

## Comment Letter 14

p. 3 SIERRA CLUB

**14-11  
(Cont.)**

Selective Management. The process is too simplistic as each allotment has areas of overuse and underuse. Averaging (categorizing) will not solve resource problems. And the system rewards I permittees with range improvement funds, but not M ranchers who are doing a good job. C is totally unacceptable to conservationists. There is no throw-away land. Placing allotments in this category is totally unjustifiable and unjustified in the DEIS.

Vegetation Monitoring. Monitoring should have the first priority for range improvement funds as monitoring is critical to any management plan.

**14-12** Standard Operating Procedures. What is meant by #17?

**14-13** Chapter II. The information presented seems comprehensive. At least the Ely District appears to know the land resources. Table 2-2 is very useful, although problem #3 should occur almost always when problem #1 occurs.


Chapter III. This chapter appears a more honest assessment than in most other EISs. The analysis suffers from the lack of site-specific management actions and thus is probably in violation of NEPA as well as the court orders on grazing EISs.

Overall, the EIS is surprisingly well-written, though short. The alternatives are unique to my experience - worst case types - which are not that realistic but perhaps easier to analyze in a programmatic EIS. At least, the EIS admits resource management problems. Unfortunately, the DEIS only offers non-specific management and then asks the public to trust that whatever BLM ends up doing will solve resource problems and improve range conditions. We fear that the poor conditions in the Schell RA will only be exacerbated by continued overgrazing (last three years average use), especially if eventual reductions based on monitoring data are blocked as threatened by ranchers and/or range improvement funds and BLM staff are further crippled by budget cuts.

We would like to believe that BLM can do a better job of managing the public lands than is presented in the Schell DEIS.

Thank you for considering our comments.

Sincerely,



Rose Strickland, Chair  
Public Lands Committee  
(702) 747-4237

## Response

**14-12** Excess wild horses will be gathered and placed in locations where they can be adopted by the public. They will not be destroyed in the field except under extreme circumstances, such as a debilitating injury.

**14-13** Not all allotments have fish streams, areas suggested for fencing. See Response 9-20.

## Comment Letter 15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

17 August 1982

Mr. George Cropper  
Acting District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. Cropper:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM FOR THE SCHELL RESOURCE AREA.

EPA's comments on the DEIS have been classified as Category LO-2. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

EPA appreciates the opportunity to comment on this DEIS and requests three copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

*William Arning*

*for*

John Wise, Acting Director  
Office of Policy, Technical,  
and Resources Management

Enclosures (2)

## Response



## Comment Letter 15

### Water Quality Comments

- 15-1** 1. National Forest boundaries should be observed to ensure protection of riparian and wetland areas and wildlife habitat from grazing impacts.
- Bakers Creek, Cleve Creek and Hendy's Creek are all Class "A" waters of Nevada from their headwaters to the boundaries of the National Forest.
- To protect these resources, and ensure the integrity of the National Forest and grazing allotment boundaries, grazing allotment permits should be closely monitored in the Baker Creek, Majors and Smith Creek allotments, and appropriate management activities implemented. Fencing has not been proposed for Majors or Baker Creek and this protective measure should be considered.
- 15-2** 2. Table 2-10 (p. 2-14) attempts to classify stream habitat qualitatively as poor, fair, good or excellent. The FEIS should state what criteria were used to establish this ranking system.
3. Stream areas of poorest bank cover and stability have been targeted for management practices (fencing). We are concerned about protection of the excellent and good riparian areas, as well.
- 15-3** Baker, Geyser, Hampton, North Siegal, Strawberry and Vipont Creeks were classified as having excellent habitats. The FEIS should discuss positive or active management plans to protect these riparian areas from grazing induced erosion and degradation.
- 15-4** 4. Regarding fencing provisions in the Proposed Action for Cherry, Negro and Silver Creeks:
- a. The FEIS should provide information concerning the location of fencing in relation to the particular stream reaches.
- 15-5** b. Water quality and suitable wildlife habitat are inversely proportional to the amount of livestock usage around streams and springs. The FEIS should discuss fencing to protect Class A and excellent riparian habitat stream reaches from livestock contact and stream bank erosion.
- 15-6** c. The proposed fencing plan calls for openings at 1/2 mile intervals to allow access to streams for wildlife, wild horses and livestock. This could lead to the creation of use corridors which may result in increased degradation rather than protection of riparian areas. The FEIS should address this issue and discuss management plans to control grazing within the fenced areas.

## Response

- 15-1** Neither Bakers, Hendry's, nor Majors creeks flow on BLM lands, and BLM does not have jurisdiction on Forest Service lands.
- 15-2** Streams on public lands are rated according to BLM Wetland-Riparian Area Protection and Management Manual - Manual 6740.
- 15-3** Since grazing has occurred in these areas for many years, problems should occur only if grazing practices in these areas are altered, especially if grazing use is increased. Therefore, if such grazing changes are implemented in the future, site specific Environmental Assessments would be required to assess potential impacts.
- 15-4** Fencing of all three creeks would occur in their entire portions on BLM-managed land.
- 15-5** See Responses 15-1 and 15-3.
- 15-6** The stream access points would tend to be degraded, but that would more than be compensated for by the increase in the fenced areas where no grazing would be allowed. Access points would be selected in areas where livestock congregation would have minimal impacts.

## Comment Letter 15

### EIS CATEGORY CODES

#### Environmental Impact of the Action

##### LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

##### ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

##### EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

#### Adequacy of the Impact Statement

##### Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

##### Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

##### Category 3—Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

## Response

## Comment Letter 16

## Response



## United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 36063  
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

L7617 (WR-RNE)

August 13, 1982

## Memorandum

To: State Director, Bureau of Land Management, Nevada

From: Associate Regional Director, Resources Management, Western Region

Subject: Draft Schell Grazing Environmental Impact Statement

We have concluded our review of the subject document. The Bureau of Land Management should be commended on a job well done. Since there will be no effect on Lehman Caves National Monument, we have no comments. Thank you for giving us an opportunity to comment on this document.

cc:  
Superintendent, Lehman Caves  
WASO (135)

## Comment Letter 17

LAW OFFICES  
BARRETT, HANNA, DALY & GASPAR

SUITE 475  
2550 M STREET, N.W.  
WASHINGTON, D. C. 20037

August 17, 1982

RAY L. HANNA  
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DAVID M. BARRETT  
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Larry Jung  
Schell EIS Team Leader  
United States Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Re: Schell Grazing Environmental  
Impact Statement

Dear Mr. Jung:

I am writing on behalf of the American Horse Protection Association, Inc., to comment on the draft Schell Grazing EIS.

Although the information in the draft is not entirely clear, it appears that the proposed action initially will reserve about 5,600 AUMs of forage to support about 465 wild horses. After obtaining monitoring data over the next 3 years, BLM anticipates a ten-percent reduction of both wild horse and livestock allocations in those allotments that are presently overgrazed. Nearly all of the wild horse forage would be restored over the short term (6-8 years). Livestock will enjoy a small (four percent) increase in forage allocations over the long term, and wild horse forage would increase very slightly (13 AUMs), to 5,571 AUMs, over the long term.

In this regard, the draft appears fairly balanced: it anticipates parallel reductions in wild horse and livestock numbers on those allotments that are overgrazed, plus the restoration of nearly all of the wild horse cuts over the life of the grazing management plan, as forage conditions improve.

## Response

## Comment Letter 17

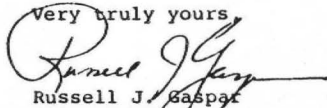
Larry Jung  
August 17, 1982  
Page Two

However, the draft is misleading in its reference to the decision to maintain the current wild horse population essentially unchanged. The removal of over 500 wild horses in early 1980 has, in effect, made the continuation and expansion of the current high levels of livestock grazing possible. The draft proposes to maintain livestock allocations at 136,669 AUMs initially. Of that amount, about 79,500 AUMs are consumed in allotments where wild horses are found. Thus, wild horse forage consumption is only about four percent of total livestock and wild horse forage allocations in the entire Schell Resource Area, and only about 6.5 percent of the consumption in the allotments where both animals are found.

**17-1** In this context, it is difficult to see why a management level of about 465 wild horses has been established. The draft provides no information on that point; it does not specify the nature or extent of resource problems and horse-cattle competition in the allotments where wild horses are found. It simply assumes that the drastic 1980 reduction was necessary, and makes it a premise upon which the draft EIS was developed.

**17-2** This approach violates the mandate of the Wild Free-Roaming Horses and Burros Act that wild horses be managed as an integral part of the natural system of the public lands. It also distorts the analysis of costs and benefits required by the National Environmental Policy Act. For that reason, AHPA urges you to analyze an alternative that will provide for some increase in the wild horse herd over the long term in conjunction with implementation of the grazing plan. Furthermore, since large reductions in wild horse numbers already have taken place, AHPA urges that future short-term reductions in forage allocation fall principally on livestock.

Very truly yours,



Russell J. Gaspar

Attorney for American Horse  
Protection Association, Inc.

cc: Joan R. Blue  
RJG:bb

## Response

**17-1** Four hundred and sixty-five is the number of horses BLM estimates were on the range when the EIS was prepared.

**17-2** Thank you for your comment; it will be considered in the MFP-3 decision-making process. Also see Response 9-1. The No Grazing alternative provides for increased numbers of wild horses.



## Comment Letter 18

DAVID ELDRIDGE . BOX 46 . BAKER NEV. 89311

As a livestock operator in the Schell Resource Area, my first impression is that the livestock operators are not getting adequate representation in individual allotment decisions.

- 18-1** To force affected livestock operators to take reductions based solely on three previous years use is unfair. This action will have adverse impact on any operator who, for whatever reason, has taken voluntary non-use of a portion of his licensed AUMs during 1977 through 1979. This proposed action should be deleted in favor of continuing the current system, until such time as monitoring data indicates a change in AUM levels are warranted.
- 18-2** Adequate consideration has not been given to allotments that are already under AUMS, in respect to the implementation of proposed projects, such as water developments and seedings, which have already been proposed but not implemented.
- 18-3** On Table 1-2, the wildlife demand AUM and the reasonable number of wildlife AUM represents a 212% increase in wildlife AUMs. This seems to be an excessive increase, when taking into consideration such things as impact on private lands and the availability of summer range. This increase and introduction of new game should only be considered after going through coordinated resource management and planning processes.
- 18-4** **SELECTIVE MANAGEMENT**  
The allotments categorization should be done with the participation of the permittee, interested groups and individuals through the CRIP process and be negotiable in the future.
- 18-5** **VEGETATION**  
The fencing out of livestock from streams to improve stream habitat should be a last resort. There is a range of alternatives which should be considered by a group such as the CRIP group, with participation of the affected permittee before such action is taken. To improve stream habitat by fencing out of livestock is not sound range management and conflicts with many existing studies.
- 18-6** **SUPPLEMENT MAPS**  
The supplement maps in the impact statement are generalized and misleading because they give one the feeling that livestock grazing has deteriorated the majority of the area.
- In the Cattle Forage Condition Map, it puts an overwhelming majority of the area in poor condition, with no specific reasons.
- In the Range Trend Map, I question how a trend could be derived at without an ongoing utilization and monitoring program.
- Upon reading the draft EIS, my interpretation is that if a problem arises, the answer to that problem is the reduction of livestock use, when in fact there is little data to support this practice.

## Response

**18-1** See Responses 2-1 and 2-2.

**18-2** Since the time that the AMPs in the Schell RA were developed, BLM's policy for management emphasis funding and range improvements has changed. Under the new Rangeland Management Policy, after completion of the EIS, allotments will be categorized by their resource values according to the Selective Management Criteria explained on pages 1-20 and 1-21 of the draft EIS.

Funding for improvements for Category M and C allotments will primarily be from private sources. Very little, if any, public funds will be available for use on these allotments. Priority for funding improvements on I Category allotments will be from range improvement or appropriated funds, with private funding encouraged.

Allotments with existing AMPs that still have the values that need additional improvement would probably be placed in Category I. Existing AMPs in Category M or C allotments would probably not receive public funding unless it was in excess of that needed on I allotments.

**18-3** See Response 9-8.

**18-4** We appreciate your comment.

**18-5** See Responses 11-8, 11-44, and 11-45.

**18-6** Livestock forage condition is generally poor in the Schell RA because of the shrub dominated communities rather than grasslands. See Response 11-16 for a more detailed explanation. This does not mean that the range is in a deteriorated state, but rather that highly palatable species are not abundant. Apparent range trend was determined during the 1979 Range Survey. Also see Response 11-17.

## Oral Comments

### Reno Public Meeting

- 1 Fred Jenkins, President, Imperial Farms Land and Cattle Company, Owner, Geyser Ranch

"I believe that the BLM would be well advised to further develop their monitoring program on the ground with the permittees to justify the increase or decrease in livestock numbers by --field-by-field or area-by-area analysis of water availability, proposed or possible water development to increase the dissemination of the animals over the various allotments."

- 2 Tom Eaman, Range Scientist, Dames & Moore, Denver, CO

"I am interested in any research, BLM experience or grazing records that support or document the statement in the EIS for the no-livestock grazing alternative. My interest is related primarily to basin big sagebrush range sites. The summary in Table 1 where you have the response to the impact of no livestock grazing, short and long term, quoted the improvement in the entire Schell Resource Area, is due to the removal of livestock, that this will result in a significant beneficial impact."

## Response

- 1 CRMP procedures including allottee consultations will be used in determining need for changes in stocking rates, project development, and plan implementation. While funding levels may force some adjustment in the extent of the monitoring program, the intensity of monitoring on a given allotment will be determined by the problems on the allotment.

- 2 As indicated in Appendices B and C, species composition, reproduction, and vigor are important determinants of livestock forage condition and apparent trend. The removal of livestock would considerably reduce grazing pressure throughout the Schell RA. This would allow previously grazed plants to increase in vigor and reproduction, thus increasing species composition.

In a review of herbage production on moderately grazed and ungrazed western ranges, Lacey and Van Poolen (1981) found that annual herbage production (a major determinant of vigor) averaged  $68 \pm 46\%$  higher when plots were protected from a moderate level of livestock grazing. Similarly, herbage production of individual plants averaged  $59 \pm 50\%$  higher when they were protected rather than clipped at a moderate level of use. Although none of the articles reviewed by Lacey and Van Poolen considered "basin big sagebrush range sites," they did cover an array of vegetation types (20 comparisons in 7 states). Anderson and Halt (1981) studied sagebrush-dominated rangeland in southeastern Idaho. They found a 20-fold increase in perennial grass cover over the past 25 years in the absence of grazing by domestic livestock. This was paralleled by significant increases in density and distribution of the four most important grasses as well as an increase in shrub cover. They hypothesized that this was a reflection of the availability of seeds as formerly depleted populations increased in size.

## Oral Comments

### Ely Public Meeting

- 3 Brent Eldridge, Rancher, Schell Resource Area

"The apparent Range Trend Map is inaccurate. I've been advised personally by Bureau personnel over the past decade, Muncy Creek AMP pastures have shown consistent improvement as measured by trend studies in all but one pasture. ... The Range Trend Map ... is ... in conflict with reality ... . They should be deleted from the draft EIS."

## Response

- 3 The Apparent Range Trend map was developed from the 1979 Range Survey and was a one-time ocular assessment. This data was the best available resource area wide and therefore was used to develop the Apparent Range Trend Map.