



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

ELY DISTRICT OFFICE
HC33 BOX 150
ELY, NEVADA 89301-9408

Buck + Bald HMA m 11/2/96



IN REPLY REFER TO:

1610/4400
(NV-047)

NOV 2 1990

Dear Public Land Interest:

The Egan Resource Area (ERA) is now in the process of evaluating the monitoring data on the following allotments (see the attached map for locations-numbers keyed to map):

Map Reference #	Allotment Name	Allotment Categorization	Allotment Number
3	*Cold Creek	M	0603
6	*Horse Haven	I	0620
8	*Medicine Butte*	I	0501
31	*Duckcreek Basin	M	0419
33	Gilford Meadows	M	0424
49	*Newark	I	0608
63	Little White Rock	M	0913
68	Chimney Rock	M	0914
69	Cattle Camp/Cave Valley	I	0903
81	*North Cove	I	0816

*The Medicine Butte Allotment Evaluation is a carryover from the 1990 fiscal year.

The purpose of an evaluation is to assess if current management practices are meeting the allotment specific and land use plan objectives as described in the Rangeland Resource Summary (RPS), dated May 1988, for the ERA.

This fiscal year (1991) the ERA is scheduled to complete the evaluation process for these allotments through either an agreement or proposed decision, if they are in need of an adjustment of current management practices, or to document the files if no change in current management is indicated by adequate monitoring data.

I request that those individuals and groups that have an interest in any or all of the listed allotments please submit by January 31, 1991, allotment specific data related to the allotment objectives described in the RPS. The information submitted will be used during the allotment evaluation process and to determine who is an affected interest and the nature of their interest.

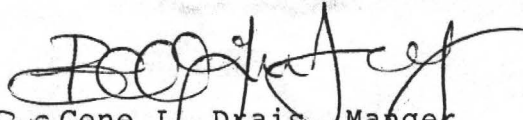
The ERA will incorporate any pertinent allotment specific information provided by the public into the allotment evaluation, which will be completed through the technical recommendations portion. During the summer of 1991, the ERA will coordinate the review of the evaluation with the permittee and other affected interests that requested involvement through an allotment specific response to this inquiry.

At this point the ERA will consider the input received from review of the evaluation by all the affected interests and in July and August 1991 complete the final portion of the evaluation. This consists of selection of management action(s) to be taken and subsequent development of a proposed decision, agreement, and/or documentation to the files if no change is recommended for the allotment.

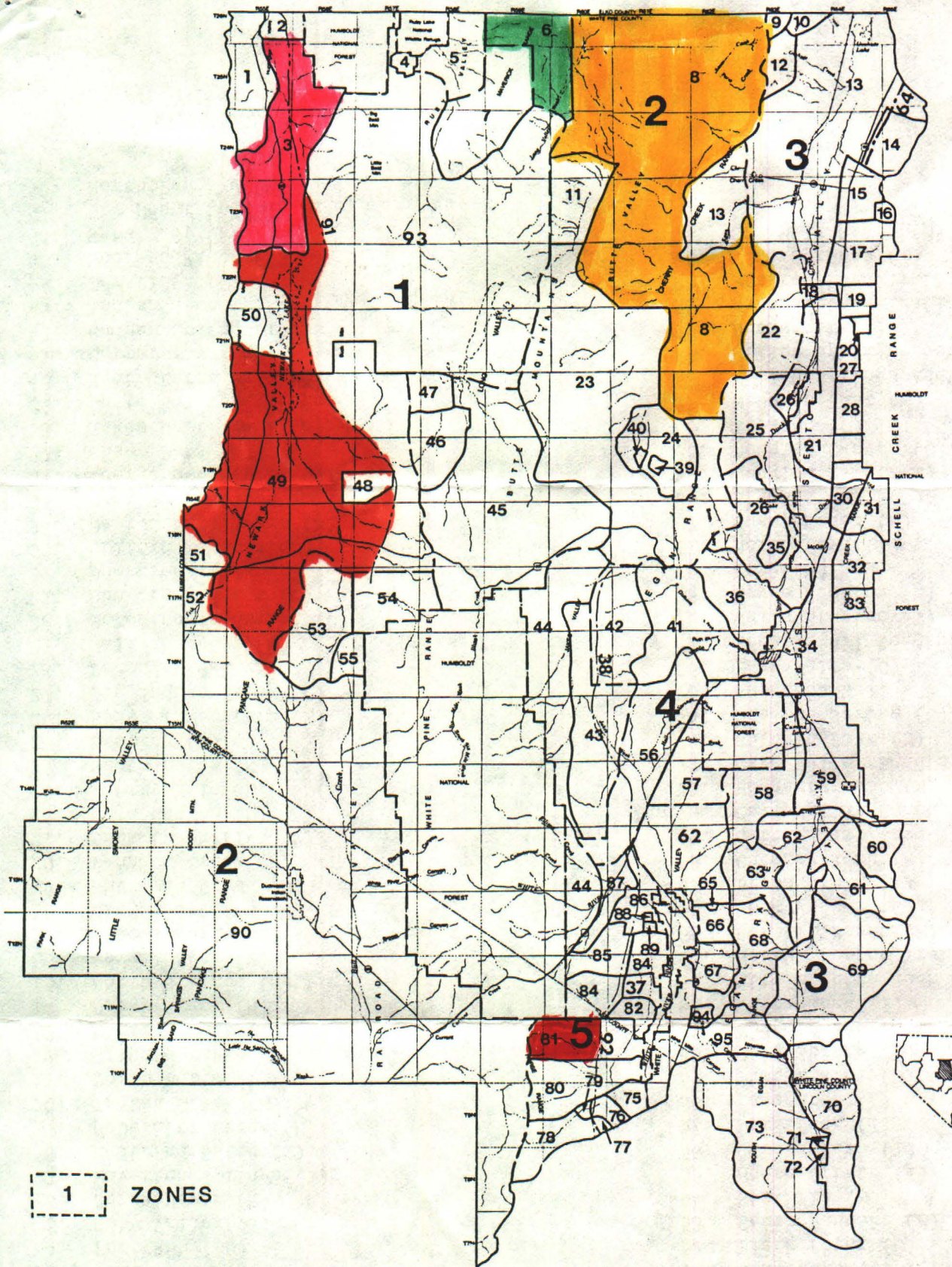
It is my intention that the above described procedures will provide the opportunity for permittees and other affected interests to become involved in the allotment evaluation process as well as provide the opportunity to become informed of the conclusion of the evaluation process.

In response to this letter, please send your allotment specific data and information to the above address, attention: Gene Drais, Egan Resource Area Manager.

Sincerely,


for Gene L. Drais, Manager
Egan Resource Area

Enclosure: Allotment List
and Map



SEE BACK OF MAP FOR LIST
OF GRAZING ALLOTMENTS
AND MANAGEMENT
CATEGORIZATION.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
EGAN RECORD OF DECISION
GRAZING ALLOTMENTS AND
MANAGEMENT ZONES

Grazing Allotments
MIC Categories

1. Railroad Pass (I)
2. White Pine Seeding (M)
3. Cold Creek (I)
4. Fort Ruby (M)
5. Ruby Valley (I)
6. Horse Haven (I)
7. Maverick Springs (I)
8. Medicine Butte (I)
9. McDermitt Creek (M)
10. Indian Creek (M)
11. North Butte (I)
12. Goshute Basin (M)
13. Cherry Creek (I)
14. Becky Creek (M)
15. North Steptoe (M)
16. Lovell Peak (M)
17. Schellbourne (M)
18. Middle Steptoe (C)
19. Whiteman Creek (C)
20. Bennett Creek (M)
21. Duck Creek Flat (M)
22. Gold Canyon (M)
23. Thirty Mile Spring (I)
24. South Butte (M)
25. Steptoe (M)
26. Heusser Mountain (M)
27. Big Indian Creek (C)
28. Second Creek (M)
29. Gallagher Gap (M)
30. Schoolhouse Spring (C)
31. Duckcreek Basin (M)
32. Duckcreek (M)
33. Gilford Meadows (M)
34. West Schell Bench (M)
35. Goat Ranch (I)
36. Georgetown Ranch (C)
37. Sheep Pass (I)
38. Jakes Unit Trail (M)
39. Butte Seeding (M)
40. South Butte Seeding (M)
41. Copper Flat (M)
42. Badger Spring (I)
43. Indian Jake (I)
44. Tom Plain (C)
45. Moorman Ranch (I)
46. Sabala Spring (M)
47. Dry Mountain (M)
48. North Pancake (M)
49. Newark (I)
50. Strawberry (M)
51. Silverado (C)
52. Black Point (C)
53. South Pancake (M)
54. Six Mile (M)
55. Monte Cristo (I)
56. Giroux Wash (I)
57. Dark Peak (I)
58. Lake Area (I)
59. Tamberlaine (M)
60. Cold Spring (M)
61. Connors Summit (M)
62. White Rock (I)
63. Little White Rock (M)
64. North Steptoe Trail (C)
65. Sawmill Bench (M)
66. Rock Canyon (C)
67. Brown Knoll (I)
68. Chimney Rock (M)
69. Cattle Camp/Cave Valley (I)
70. Cave Valley Ranch (I)
71. Haggerty Wash (M)
72. Cave Valley Seeding (M)
73. Shingle Pass (M)
74. Dee Gee Spring (C)
75. Sorenson Well (C)
76. East Wells (C)
77. Sheep Trail Seeding (M)
78. Wells Station (I)
79. Maybe Seeding (M)
80. Cove (M)
81. North Cove (I)
82. Swamp Cedar (M)
83. Big Six Well (C)
84. Douglas Point (I)
85. Douglas Canyon (C)
86. Preston (C)
87. McQueen Flat (M)
88. Willow Springs Addition (M)
89. Willow Springs Seeding (M)
90. Duckwater (I)
91. Warm Springs Trail (M)
92. Preston-Lund Trail (M)
93. Warm Springs (I)
94. Six Mile Ranch (M)



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

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November 14, 1990

Gene L. Drais, Manager
Egan Resource Area
Ely District Office-BLM
HC33 Box 150
Ely, Nevada 89301-9408

Dear Mr. Drais,

Thank you for the opportunity to participate in the allotment evaluation process. We wish to be considered an interested and affected party as our concern is for the protection of wild horses and their habitat.

In checking documents I have found that the following allotments contain wild horses; Cold Creek, Horse Haven, Medicine Butte, Newark, and North Cove. Please correct me if I have missed any allotments that are being evaluated that have wild horses in them.

Our main concern for the wild horses during the allotment evaluation process is who ate what....when and where.

Some of the information we would need to evaluate the allotments in question would be:

- 1) Actual Livestock Use
 - (a) Actual Use Reports
- 2) Season of Use by Wild Horses
- 3) Season of Use by Livestock
- 4) Seasonal Census...showing where the majority of wild horses graze during seasonal yearly movements.
- 5) Use Pattern Mapping
- 6) Location of water used by livestock and wild horses.
- 7) Map of the HMA in relationship to the allotment that shows distribution of horses, cows, and water.

In the RPS dated May 1988, for the Egan Resource Area you discuss AML's for all of the allotments listed above. With the exception of North Cove, all of the allotments are slated for a reduction in AUM's to support a management objective to initially manage rangeland habitat at set AML's for wild horses.

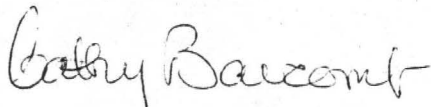
Gene L. Drais, Manager
November 14, 1990
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In the recent IBLA 89-285, 89-286 decision dated October 16, 1990, for API, it states (116 IBLA 243): "As with earlier APIA challenges to BLM removal actions, the actions in question herein were generally designed to return the number of wild horses within each HMA to an AML. We examined BLM's general method for establishing AML's at great length in APIA, supra, and discussed the framework for how these numbers evolved. Our discussion in APIA, supra, at 115-19, regarding BLM's approach and how its horse removal calculations for administrative convenience have not complied with the requirements of the law is similarly controlling in the instant cases." It further states that "These AML's were originally established for administrative convenience, rather than based on a determination of the optimum number of wild horses which would maintain the range in a thriving natural ecological balance and avoid a deterioration of the range." "There is no evidence that BLM has engaged in any range assessments adequate to allow BLM to conclude that returning the numbers of wild horses to these AML's would achieve that optimum number of wild horses."

With keeping this ruling in mind, any arguments you present to establish an AML in any of the allotments in question should be thoroughly defined, well documented statements that removal is necessary to restore the public range to a thriving natural ecological balance and prevent a deterioration of the range threatened by an overpopulation of wild horses.

Again, thank you for the opportunity to participate in the evaluation process for Cold Creek, Horse Haven, Medicine Butte, Newark, and North Cove allotments. If you have any questions, please feel free to call.

Sincerely,



CATHY BARCOMB
Acting Executive Director