

7/10/92



STATE OF NEVADA
DEPARTMENT OF WILDLIFE

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July 10, 1992

BOB MILLER
Governor

WILLIAM A. MOLINI
Director

Gene Drais, Manager
Egan Resource Area
Bureau of Land Management
HC33 Box 33500
Ely, NV 89301

RE: Draft Warm Springs Allotment Evaluation Summary

Dear Mr. Drais:

We appreciate receiving the draft evaluation and having the opportunity to provide our comments and recommendations.

The overall value of this allotment for wildlife, particularly mule deer, has been clearly recognized by both the Bureau and our Department. The magnitude of these resources merit a thorough evaluation and a strong commitment for improved management.

In general, we feel the evaluation adequately portrays the current state of resource conditions. It was noted that of 15 native key areas only 4 rated better than 50% of PNC. Of the 20 total key areas, 6 show a downward trend and the rest are static. None of the areas show an upward trend. Of the 21 land use planning objectives applicable for this allotment, we see that only two have been met. The evaluation notes that nearly all of the riparian areas have received heavy to severe utilization by horses and cattle. From our recent ocular surveys of several riparian areas, we feel that riparian conditions have continued to deteriorate, even in the last several years.

In our opinion, the proposed recommendations offer a substantial commitment to improved land use management and the opportunity to meet many of the land use planning objectives in the future. We feel that current resource conditions and trends cannot and should not continue any longer if possible. Therefore, based on those resource conditions and trends, we strongly recommend and encourage you to place the Final Decision into full force and effect. Based upon the magnitude of wildlife resources within this allotment, we feel the Department may want to intervene to support

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a sound decision, particularly if placed in full force and effect.

For the Final evaluation we would request your consideration for changes in a couple of the technical recommendations. In the Newark evaluation, we felt we made a strong and valid case for a season of use on whitesage to not extend past April 1. We feel that based on vigor and invasion by less desirable species, this season of use is justified. However, the proposed April 15 date is much better than April 30. Our second recommendation concerns the season of use on bitterbrush. The Buck, Bald, Maverick and Diamond Mountains HMP points out the importance of the winter range to the Area 10 deer herd and the objective to limit utilization to 15% of current annual growth. This objective would be much easier to achieve if livestock use did not extend past July 15 within the Buck/Bald use area.

We appreciated meeting with your staff on July 7 to discuss these issues and recommendations with them. We will continue to work with you throughout the evaluation process on this allotment.

Sincerely,



Larry Barngrover
Wildlife Regional Manager

LIVESTOCK

PREFERENCE = 23995

ACTUAL USE = 12227 (YEARS USED TO CALCULATE VARIES BY USE AREA)

PROPOSED USE = 7766 (36% BELOW ACTUAL USE, 68% BELOW PREFERENCE)

HORSES

ACTUAL USE = 5502 (FROM III, B. 7. PARTS a-g)

PROPOSED USE = 1732 (69% BELOW ACTUAL USE)

TOTAL (HORSES/LIVESTOCK)

ACTUAL = 17729

PROPOSED = 9498 (% BELOW ACTUAL USE)

IN OUR EVALUATION WE SAW A PROPOSAL FOR A SIZEABLE REDUCTION (68%) FROM PREFERENCE AND A FAIRLY SIGNIFICANT ONE (36%) FROM ACTUAL LIVESTOCK USE. WE ALSO APPROVED OF THE APRIL 15 OFF DATE ON MAJOR USE AREAS, EVEN THOUGH WE WOULD HAVE PREFERRED THE APRIL 1 ON WE ALSO FELT THAT A REDUCTION IN HORSE USE WAS JUSTIFIED BUT WE DIDN'T FEEL IT WAS OUR RESPONSIBILITY TO COMMENT ON THE PROPORTIONAL REDUCTIONS BETWEEN LIVESTOCK AND HORSES.

WE THINK IT IS EXTREMELY IMPORTANT THAT ALL AFFECTED INTERESTS PUSH HARD FOR A FULL FORCE AND EFFECT DECISION, OTHERWISE WHILE RUSSELL 7 THIS UP IN COURT THE CURRENT ABUSIVE LAND MANAGEMENT CONTINUES.

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