

United States Department of the Interior

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IN REPLY REFER TO:

BUREAU OF LAND MANAGEMENT

Ely District Office HC 33 Box 33500 Ely, Novada 89301-9408

1163 (NV-040)

March 21, 1997

Scoping

Dear Evaluation Team Member,

I'd like for you to know how much I appreciate your contributions to the Allotment Evaluations/Evaluation Team meeting last week. It was ever so nice to witness the display of cooperation, courtesy and mutual respect shown by all the group members. Each of you contributed ideas, perspectives and helpful criticisms which led to some very sound suggestions for improving the Ely District Allotment Evaluations. Thank you!

Following our meeting, I visited with the Lincoln County Public Lands Commission and briefed them on what you'd accomplished earlier in the day. They provided an additional suggestion:

"Define the term 'Ecological Condition' so that someone reading about an allotment with X acres in 'fair ecological condition' will have a more positive understanding and won't think the range is in poor shape."

I've enclosed a draft team report derived from the flip charts and notes taken at the meeting. Please review them to make sure that I've accurately captured your thoughts and suggestions. If there are omissions, corrections or additional suggestions which you'd like to make, could you please let me know by April 11, 1997? If you need additional time, please give me a call. My telephone number is (702) 289-1841.

After I've received responses from all of you, I'll finalize the report and send the document for your signature. During the interim period, I'm going to share the

DRAFT

EVALUATION TEAM RECOMMENDATIONS FOR IMPROVING THE ELY DISTRICT'S ALLOTMENT EVALUATIONS AND MULTIPLE USE DECISIONS

The evaluation needs an introductory information paragraph explaining how the evaluation fits into the planning/decision process.

Include a reference Page. As a minimum, cite the following and urge readers to become familiar with the cited documents to aid their understanding of the purpose of the allotment evaluation:

Land Use Plan

Rangeland Program Summary Document

Nevada Rangeland Monitoring Handbook

Allotment Management Plan

Standards & Guidelines

If they (uninformed interests) are not willing to go into this, they can't pass Go (shouldn't be allowed to protest).

The Evaluation needs to tie to N.E.P.A.

Do an Environmental Assessment. Include an alternative analysis in the evaluation. Include rancher presented alternatives if there are some.

Who did this? Cite the author(s) of the document and data collected (tables, charts, etc.)...give credit and establish accountability.

Maps, etc. (technical recommendations)...give the name of the person making the recommendation; if they are making a professional judgement, give their best professional opinion and so state. Include a legend for the maps and list the preparer.

Indicate the date(s) that the transects were read (mm/dd/yy). Seasonal differences in gathering the data can skew the conclusions reached or confuse someone trying to understand how the conclusions were derived.

Reference the work sheets used to collect the data.

Clarify how many AUMs are attached to the permit, both suspended and active. Give an explanation of what each entails (some readers are unfamiliar with the terms, leading to arguments over "paper cows").

Define what the rancher has to do to get the suspended AUMs back. Cite the range standards to be met. Explain the tax effect on the permittee for each alternative.

Provide a summary of actual use by everything: cows, wild horses and wildlife.

Provide color maps (use pattern, etc.). The technology is available and it would aid in communication.

Data should be current with the Evaluation. Some evaluations are based upon data that are several years old.

Use all available data (include non-Bureau sources).

Explain why land-use plan objectives were not met by BLM (money, time, etc.) if have not been met.

Present information in an unbiased manner or a more positive way; give whole picture - especially on decision or agreements. Significant positive improvements have often been made on an allotment and the evaluation makes no mention.

Provide a narrative discussing the reason(s) supporting the decision.

Hold field trips at times when the public can come. Weekends are better for many people. Tours are an excellent opportunity to help in the education of people who are interested in the process.

There should be a consistent format for the documents. There is considerable variation in the documents produced through out the state. It causes confusion for readers and makes review of numerous documents more difficult.

A Notice of 15 days is very short considering the time required for turn around in the mail. It is ok for many documents, however there is a need for a mechanism that could trigger an extension for a longer period of time for documents of concern.

A transfer	notification	on or	decision	should	clearly	state	that	the	transfer	was	made
from	to _		and	include	everyt	hing	that	was	s transfe	rred	from
1	to	_•									

If the transfer results in no change, then no problem. If there is a change, the reasons for the transfer changes need to be supported by showing the data.

The document's continuity could be improved in some cases (don't refer to things that haven't been discussed until later in the document). The topics of presentation need to track to be consistent (facts should agree throughout the evaluation).

Date the document.

Indicate water ownership within the allotment. Some out-of-state readers are not familiar with Nevada water law and don't realize the waters are often privately owned.

Elsie Dupree	DATE	Duane Erickson	DATE
Laurel Etchegaray	DATE	Merlin Flake	DATE
Roy Leach	DATE	Gracian Uhalde	DATE

draft with the range staff so they can begin building your suggestions into documents which are currently in production.

Sincerely,

Curtis G. Tucker

Special Projects Coordinator

Curtis & Tucker

Attachment: Draft Report



COMMISSION FOR THE PRESERVATION OF WILD HORSES

1105 Terminal Way Suite 209 Reno, Nevada 89502 (702) 688-2626

July 10, 1997

Mr. Gene A. Kolkman Ely District Bureau of Land Management HC 33 Box 33500 Ely, Nevada 89301-9408

Subject: Evalution Team

Dear Mr. Kolkman:

The Commission for the Preservation of Wild Horses was invited as a participant to the Ely District Allotment Evaluations/Evauation Team. As a result of our meeting in March, a summary was sent to those who attended.

As Mr. Tucker stated, the Team provided some sound suggestions in the spirit of cooperation. Some of these suggestions would improve the content and assist with understanding this decision making process.

Preceeding this meeting and summary, we presented Mr. Tucker with an example of a current document under consultation. We suggested that a Selective Management Report should embrace an environmental assessment's approach to management alternatives. As observed in this Selective Management Report, there little opportunity for selection for the lack of alternatives. This example represented several of the problems that the Team proposed meaningful solutions.

Mr. Gene Kolkman July 10, 1997 Page 2

We assume that since three months have passed and present documents have not embraced the Team's recommendations, the effort to assist the District was not successful. If these recommendations are contrary to present policies or regulations, please advise the members.

Sincerely,

CATHERINE BARCOMB Executive Director

cc. Duane Erickson, NDOW

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