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Delaney  
HMA

2/6/96



# United States Department of the Interior

Bureau of Land Management  
Caliente Resource Area  
P.O. Box 267  
Caliente, Nevada 89008

In Reply Refer To:  
4160  
Longhorn Cattle Co.  
Grazing Case File  
(NV-055.09)

FEB 06 1996

## FINAL DECISION RESCINDING NOTICE OF CLOSURE AND MODIFYING THE GRAZING PERMIT TO OPEN THE CLOSURE TO LIVESTOCK GRAZING ON THE LOWER RIGGS ALLOTMENT

CERTIFIED MAIL #P310374587  
RETURN RECEIPT REQUESTED

Ken Thompson  
Longhorn Cattle Company  
6200 South Eastern Avenue  
Las Vegas, Nevada 89109

Dear Mr. Thompson:

On December 15, 1995, I issued a Proposed Decision rescinding the Notice of Closure and modifying the grazing permit to open the closure to livestock grazing on the Lower Riggs Allotment. On January 22, 1996, I received a letter of protest from the Commission for the Preservation of Wild Horses.

On February 2, 1996, we discussed the letter of protest with a representative of the Commission for the Preservation of Wild Horses. The issues they identified are as follows:

1. "We are unaware of any allotment boundary fences to manage livestock or limit wild horse to their herd management area."

The Meadow Valley Mountain Range is a geographic barrier between the Lower Riggs and Henrie Complex allotments with drift fences installed at the Carp Pass. These act together to control both livestock and wild horse movement between the two allotments, and limits the wild horses to the Meadow Valley HMA.

No horses on the Lower Riggs Allotment were adversely affected by either the original Full Force and Effect Decision, nor the Proposed Decision.

2. "Use pattern mapping data provided for the Henrie Complex indicate a large percentage of the adjacent allotments suffering overgrazing by both livestock and wild horses prior to the Meadow Fire."

The Lower Riggs Allotment was not overgrazed prior to nor after the burn, by either livestock or wild horses. The Lower Riggs Allotment is separated from the Henrie Complex by a geographic barrier and is not affected by the grazing that occurs on the Henrie Complex.

3. "In the interest of resource protection and re-establishment of the Meadow Valley Wild Horse Herd, the Commission protests the proposed decisions."

The Lower Riggs Allotment is outside the Meadow Valley HMA and no actions in this decision have any impact on the Meadow Valley HMA Horse Herd. Geographic barriers and drift fences prevent any movement between the Lower Riggs and Henrie Complex allotments and the HMAs.

I have considered the protest addressed above and have determined that my decision dated December 15, 1995 will remain unchanged. Based on the protest, the Fire Rehabilitation Environmental Assessment (EA) (#NV-055-93-29) Finding of No Significant Impact and Record of Decision dated September 29, 1993, the Full Force and Effect Notice of Closure to Livestock Grazing issued on October 7, 1993, the Full Force and Effect Grazing Decision dated October 15, 1993 modifying your Federal Grazing Permit and the results of the burn evaluation (Attachment 3) showing that resource management objectives have been met, **my final decision is to modify your existing Federal Grazing Permit signed November 8, 1994, as it relates to the Lower Riggs Allotment only, by rescinding the notice of closure and opening the burn area to livestock grazing.** I will issue a modified Federal Grazing Permit reflecting my decision.

The permitted use (AUMs) of your existing permit are not affected by this decision. Nor does this decision affect other allotments included in this permit.

Your ten year Federal Grazing Permit is modified for the Lower Riggs allotment only, as follows:

**FROM:**

EXISTING FEDERAL GRAZING PERMIT  
FOR THE LOWER RIGGS ALLOTMENT PORTION ONLY  
11/04/94 to 02/28/2004

ALLOTMENT NAME	NUMBER OF LIVESTOCK	KIND OF LIVESTOCK	SEASON OF USE		PERCENT FEDERAL LAND	ACTIVE PREFERENCE AUMs
			BEGIN DATE	END DATE		
LOWER RIGGS	102	CATTLE	05/01	03/24	100	1099

**TO:**

MODIFIED FEDERAL GRAZING PERMIT  
OPENING BURN CLOSURE ON THE LOWER RIGGS ALLOTMENT

11/04/94 to 02/28/2004

ALLOTMENT NAME	NUMBER OF LIVESTOCK	KIND OF LIVESTOCK	SEASON OF USE		PERCENT FEDERAL LAND	ACTIVE PERMITTED USE AUMs
			BEGIN DATE	END DATE		
LOWER RIGGS	102	CATTLE	05/01	03/24	100	1099

In order to insure the continued recovery of the burned areas, the following management objective as amended is included as a part of the terms and conditions of your permit in accordance with the February 24, 1984 grazing decision for the Lower Riggs allotment:

Utilization on the current years growth must not exceed 50 percent on any one of the key perennial grass species, and 30 percent in the spring and 50 percent the rest of the year for any one of the key shrub species within the burn area. If these use levels are reached or exceeded for any one of the key species, the livestock must be removed from and kept out of the burn area. Key grass species are Indian ricegrass, sand dropseed, desert needlegrass, and purple threeawn. Key shrub species are mormon tea and desert bitterbrush. These key species may vary by key area and range site.

All other terms and conditions for the existing permit for the Lower Riggs Allotment remain unchanged (Attachment 2).

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final decision, may file an appeal and petition for stay of the decision pending final determination on appeal.

If you wish to appeal this decision for the purpose of a hearing before an Administrative Law Judge and, in accordance with 43 CFR 4160.3 (c), 4160.4 and 4.470, you are allowed thirty

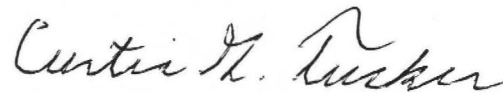
(30) days after the proposed decision becomes final within which to file an appeal and a petition for stay with the Caliente Resource Area Manager, Bureau of Land Management, P.O. Box 237, Caliente, Nevada 89008. The appeal shall state the reasons, clearly and concisely, why you think the final decision is in error.

Should you wish to file a motion for stay in accordance with 43 CFR Sec. 4.21 (b) (1), the appellant shall show sufficient justification based on the following standards:

1. the relative harm to the parties if the stay is granted or denied;
2. the likelihood of the appellant's success on the merits;
3. the likelihood of immediate and irreparable harm if the stay is not granted;
4. whether the public interest favors granting the stay.

The appellant requesting the stay bears the burden of proof to demonstrate that a stay should be granted.

Sincerely,



Curtis G. Tucker  
Area Manager

Attachments

1. Lower Riggs Allotment Map with Burn Area
2. Terms and Conditions for the Lower Riggs Allotment
3. Meadow Burn Evaluation Summary

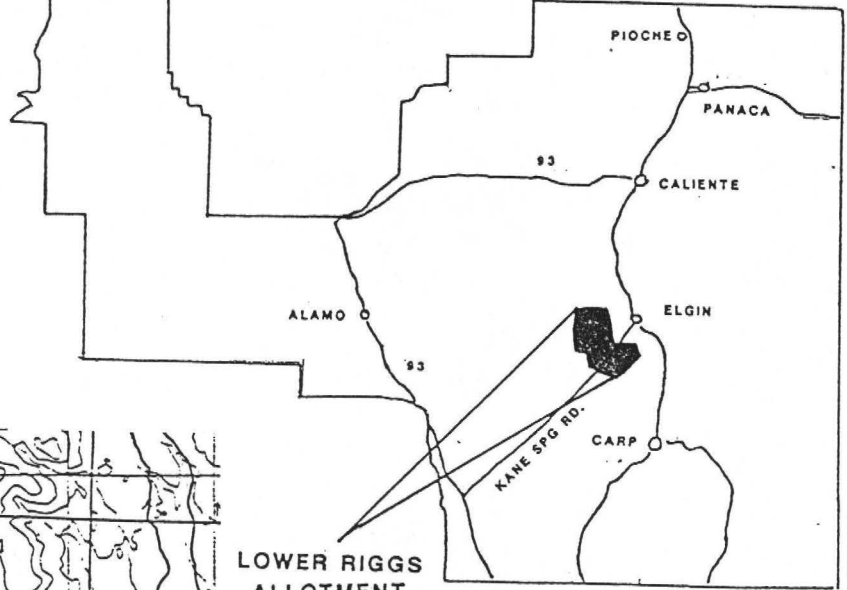
cc:

NV-043

NV-053

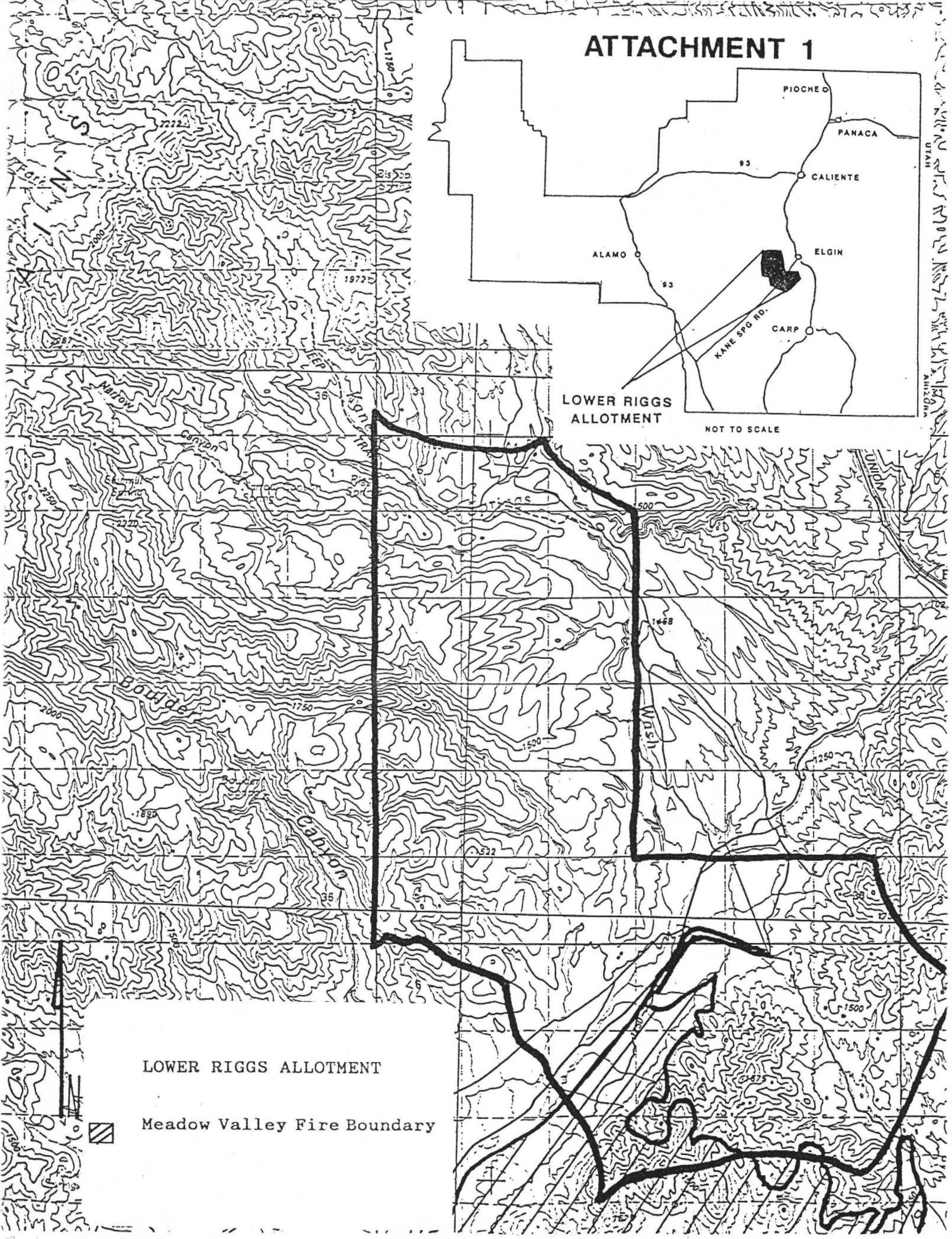
Comm. for the Preservation of Wild Horses, C. Barcomb	Certified Mail No. P310374582
Wild Horse Organized Assistance, Inc., D. Lappin	Certified Mail No. P310374583
N-5 Board, Kenneth Lee	Certified Mail No. P301374584
Lincoln County Public Lands Commission	Certified Mail No. P310374585
Lincoln County Commission	Certified Mail No. P310374586

# ATTACHMENT 1



LOWER RIGGS ALLOTMENT

NOT TO SCALE



LOWER RIGGS ALLOTMENT



Meadow Valley Fire Boundary

## ATTACHMENT 2

### TERMS AND CONDITIONS FOR THE LOWER RIGGS ALLOTMENT

1. Utilization on the current years growth must not exceed 50% on any one of the key perennial grass species, and 30% in the spring and 50% the rest of the year for any one of the key shrub species within the burn area. If these use levels are reached or exceeded for only one of the key species, the livestock must be removed from and kept out of the burn area. Key grass species are Indian ricegrass, sand dropseed, desert needlegrass, and purple threeawn. Key shrub species are mormon tea, and desert bitterbrush.
2. Grazing fees are due upon issuance of billings. Applications for changes in grazing use must be in written form and received by the Bureau of Land Management Office no later than 15 days prior to the desired date of change. Applications for changes in grazing use which require the issuance of a replacement or supplemental billing notice shall be subject to a ten (10) dollar service charge.
3. Grazing applications will be issued on a yearly basis showing all grazing use as active. if you desire to take all or partial non-use for the grazing year, you must indicate this in writing on your grazing application, along with your reasons.
4. The term Federal grazing permit is subject to cancellation, suspension, or modification for any violation of the Code of Federal Regulations or specified terms or conditions of this permit.
5. When the standards and guidelines are identified in accordance with the new 43 CFR dated August 21, 1995, these standards and guidelines are to be considered part of the terms and conditions of this permit.

### ATTACHMENT 3

The management actions required in the specific terms and conditions for your permit as modified in the October 15 decision were:

- A. "The Meadow Fire Closure Area Specific Terms and Conditions shall remain in effect for a minimum of two years, beginning October 15, 1993 and continuing until monitoring indicates resource objectives for the burn area have been attained."
- B. "You shall continuously herd and manage your livestock away from the burn closure area by riding and controlling livestock access to the water trough located in t. 7 S., R. 66 E., Sec. 4 as identified in Attachment 1."
- C. "Any livestock found within the burn closure area (Attachment 1) shall be removed immediately from the burn area by you. You are to notify the Caliente Resource Area office within 24 hours of such actions."
- D. "Should these practices fail to keep the livestock from the closure area, livestock shall be remove from the allotment immediately. The total closure of the Lower Riggs Allotment to grazing in order to insure protection of the burn area will be implemented by the Bureau of Land Management under the authority of this decision."

The following are the resource objectives for the burn area that must be met prior to opening the closure to livestock grazing on the burn:

- 1. Manage for species diversity of the perennial species endemic to the black brush sites for a minimum of 15 species. Three of the species must be native perennial grass species and their growth form must show good vigor as documented photographically.
- 2. Allow for the reestablishment by seedling and/or resprouting/regrowth of shrub and perennial grass species endemic to the ecological sites burned.
- 3. Manage for a canopy cover (basal and crown cover) of native perennial species with a minimum of 15 percent. Annuals are not included in the cover since most that occur in the area after a burn are introduced annuals such as cheatgrass, red brome and filaree that are not desirable ecologically and are climatically variable in their potential for cover.
- 4. Utilization levels of zero or no measurable use during the closure period. Utilization on the current years growth not to exceed 50 percent on any one of the key perennial grass species and 30 percent in the spring and 50 percent the rest of the year for any one of the key shrubs after the burn is reopened to grazing.

The following Tables 1 and 2 summarize whether or not the livestock grazing decisions' management actions and burn resource objectives identified above were followed and met, respectively:

Table 1

MANAGEMENT ACTIONS ASSESSMENT			
ALLOTMENT	GRAZING DECISION MANAGEMENT REQUIREMENTS		MINIMUM TERM OF ACTION MET YES OR NO
	HERDING OF LIVESTOCK AS NEEDED MET YES OR NO	RESTRICTING WATER ACCESS NEAR BURN AS NEEDED MET YES OR NO	
LOWER RIGGS	<p style="text-align: center;">YES</p> <p>In the spring of 1995 livestock were noted in the burn near the south allotment fence and the permittee was required to remove cattle off burn. Permittee removed cattle entirely.</p>	<p style="text-align: center;">YES</p> <p>Livestock access was restricted at the water trough located in T7S R66E Sec. 4.</p>	<p style="text-align: center;">YES</p> <p>Minimum of 2 Years Close to Grazing</p>

Table 2

RESOURCE DATA ASSESSMENT FOR THE CLOSURE AREA	
RESOURCE OBJECTIVES IDENTIFIED	RESOURCE OBJECTIVES MET YES OR NO AND RESULTS
1. Species diversity of min. 15 with 3 grasses. Good vigor.	<p style="text-align: center;">1. YES</p> <p>The burned blackbrush sites had between 23 and 26 perennial species overall with 4 native perennial grass species. Excellent vigor documented photographically.</p>
2. Seedling, regrowth, and re-sprout of native species.	<p style="text-align: center;">2. YES</p> <p>All parameters met. Plants were growing from seed, regrowth and sprouting.</p>
3. Perennial species cover a minimum of 15%.	<p style="text-align: center;">3. YES</p> <p>Cover for most of the area fell within 24 to 28%. A small area (approx. 20 acres) in a previous burn had 17% cover.</p>
4. Utilization overall of no measurable use during closure period.	<p style="text-align: center;">4. YES</p> <p>Use in November 1995 was no measurable use. In March 1995, some cattle were on the southern end of burn causing a small area of slight use. Permittee (LCC) removed cattle promptly.</p>

As the above assessments in Tables 1 and 2 show, the grazing decisions' burn management actions were followed and the resource objectives were met. Additionally, the observed trend for the allotment burn was upward based on native plant vigor and diversity.





# United States Department of the Interior

Bureau of Land Management

Caliente Resource Area

P.O. Box 267

Caliente, Nevada 89008

In Reply Refer To:

4160

Brackenbury

Grazing Case File

(NV-055.09)

FEB 06 1996

## FINAL DECISION

### RESCINDING NOTICE OF CLOSURE AND MODIFYING THE GRAZING PERMIT TO OPEN THE CLOSURE TO LIVESTOCK GRAZING ON THE LOWER RIGGS ALLOTMENT

CERTIFIED MAIL #P310374588  
RETURN RECEIPT REQUESTED

Hank and Joi Brackenbury  
7J Ranch  
Rainbow Ranch  
Caliente, Nevada 89008

On December 15, 1995, I issued a Proposed Decision rescinding the Notice of Closure and modifying the grazing permit to open the closure to livestock grazing on the Lower Riggs Allotment. On January 22, 1996, I received a letter of protest from the Commission for the Preservation of Wild Horses.

On February 2, 1996, we discussed the letter of protest with a representative of the Commission for the Preservation of Wild Horses. The issues they identified are as follows:

1. "We are unaware of any allotment boundary fences to manage livestock or limit wild horse to their herd management area."

The Meadow Valley Mountain Range is a geographic barrier between the Lower Riggs and Henrie Complex allotments with drift fences installed at the Carp Pass. These act together to control both livestock and wild horse movement between the two allotments, and limits the wild horses to the Meadow Valley HMA.

No horses on the Lower Riggs Allotment were adversely affected by either the original Full Force and Effect Decision, nor the Proposed Decision.

2. "Use pattern mapping data provided for the Henrie Complex indicate a large percentage of the adjacent allotments suffering overgrazing by both livestock and wild horses prior to the Meadow Fire."

The Lower Riggs Allotment was not overgrazed prior to nor after the burn, by either livestock or wild horses. The Lower Riggs Allotment is separated from the Henrie Complex by a geographic barrier and is not affected by the grazing that occurs on the Henrie Complex.

3. "In the interest of resource protection and re-establishment of the Meadow Valley Wild Horse Herd, the Commission protests the proposed decisions."

The Lower Riggs Allotment is outside the Meadow Valley HMA and no actions in this decision have any impact on the Meadow Valley HMA Horse Herd. Geographic barriers and drift fences prevent any movement between the Lower Riggs and Henrie Complex allotments and the HMAs.

I have considered the protest addressed above and have determined that my decision dated December 15, 1995 will remain unchanged. Based on the protest, the Fire Rehabilitation Environmental Assessment (EA) (#NV-055-93-29) Finding of No Significant Impact and Record of Decision dated September 29, 1993, the Full Force and Effect Notice of Closure to Livestock Grazing issued on October 7, 1993, the Full Force and Effect Grazing Decision dated October 15, 1993 modifying your Federal Grazing Permit and the results of the burn evaluation (Attachment 3) showing that resource management objectives have been met, **my final decision is to modify your existing Federal Grazing Permit signed November 8, 1994, as it relates to the Lower Riggs Allotment only, by rescinding the notice of closure and opening the burn area to livestock grazing.** I will issue a modified Federal Grazing Permit reflecting my decision.

The permitted use (AUMs) of your existing permit are not affected by this decision. Nor does this decision affect other allotments included in this permit.

Your ten year Federal Grazing Permit is modified for the Lower Riggs allotment only, as follows:

**FROM:**

EXISTING FEDERAL GRAZING PERMIT  
FOR THE LOWER RIGGS ALLOTMENT PORTION ONLY

03/30/92 to 02/28/2002

ALLOTMENT NAME	NUMBER OF LIVESTOCK	KIND OF LIVESTOCK	SEASON OF USE		PERCENT FEDERAL LAND	ACTIVE PREFERENCE AUMS
			BEGIN DATE	END DATE		
LOWER RIGGS	29	CATTLE	05/01	03/24	100	309

**TO:**

MODIFIED FEDERAL GRAZING PERMIT  
OPENING BURN CLOSURE ON THE LOWER RIGGS ALLOTMENT

03/30/92 TO 02/28/2002

ALLOTMENT NAME	NUMBER OF LIVESTOCK	KIND OF LIVESTOCK	SEASON OF USE		PERCENT FEDERAL LAND	ACTIVE PREFERENCE AUMS
			BEGIN DATE	END DATE		
LOWER RIGGS	29	CATTLE	05/01	03/24	100	309

In order to insure the continued recovery of the burned areas, the following management objective as amended is included as a part of the terms and conditions of your permit in accordance with the February 24, 1984 grazing decision for the Lower Riggs allotment:

Utilization on the current years growth must not exceed 50 percent on any one of the key perennial grass species, and 30 percent in the spring and 50 percent the rest of the year for any one of the key shrub species within the burn area. If these use levels are reached or exceeded for any one of the key species, the livestock must be removed from and kept out of the burn area. Key grass species are Indian ricegrass, sand dropseed, desert needlegrass, and purple threeawn. Key shrub species are mormon tea and desert bitterbrush. These key species may vary by key area and range site.

All other terms and conditions for the existing permit for the Lower Riggs Allotment remain unchanged (Attachment 2).

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final decision, may file an appeal and petition for stay of the decision pending final determination on appeal.

If you wish to appeal this decision for the purpose of a hearing before an Administrative Law Judge and, in accordance with 43 CFR 4160.3 (c), 4160.4 and 4.470, you are allowed thirty (30) days after the proposed decision becomes final within which to file an appeal and a petition for stay with the Caliente Resource Area Manager, Bureau of Land Management, P.O. Box 237, Caliente, Nevada 89008. The appeal shall state the reasons, clearly and concisely, why you think the final decision is in error.

Should you wish to file a motion for stay in accordance with 43 CFR Sec. 4.21 (b) (1), the appellant shall show sufficient justification based on the following standards:

1. the relative harm to the parties if the stay is granted or denied;
2. the likelihood of the appellant's success on the merits;
3. the likelihood of immediate and irreparable harm if the stay is not granted;
4. whether the public interest favors granting the stay.

The appellant requesting the stay bears the burden of proof to demonstrate that a stay should be granted.

Sincerely,



Curtis G. Tucker  
Area Manager

Attachments

1. Lower Riggs Allotment Map with Burn Area
2. Terms and Conditions for the Lower Riggs Allotment
3. Meadow Burn Evaluation Summary

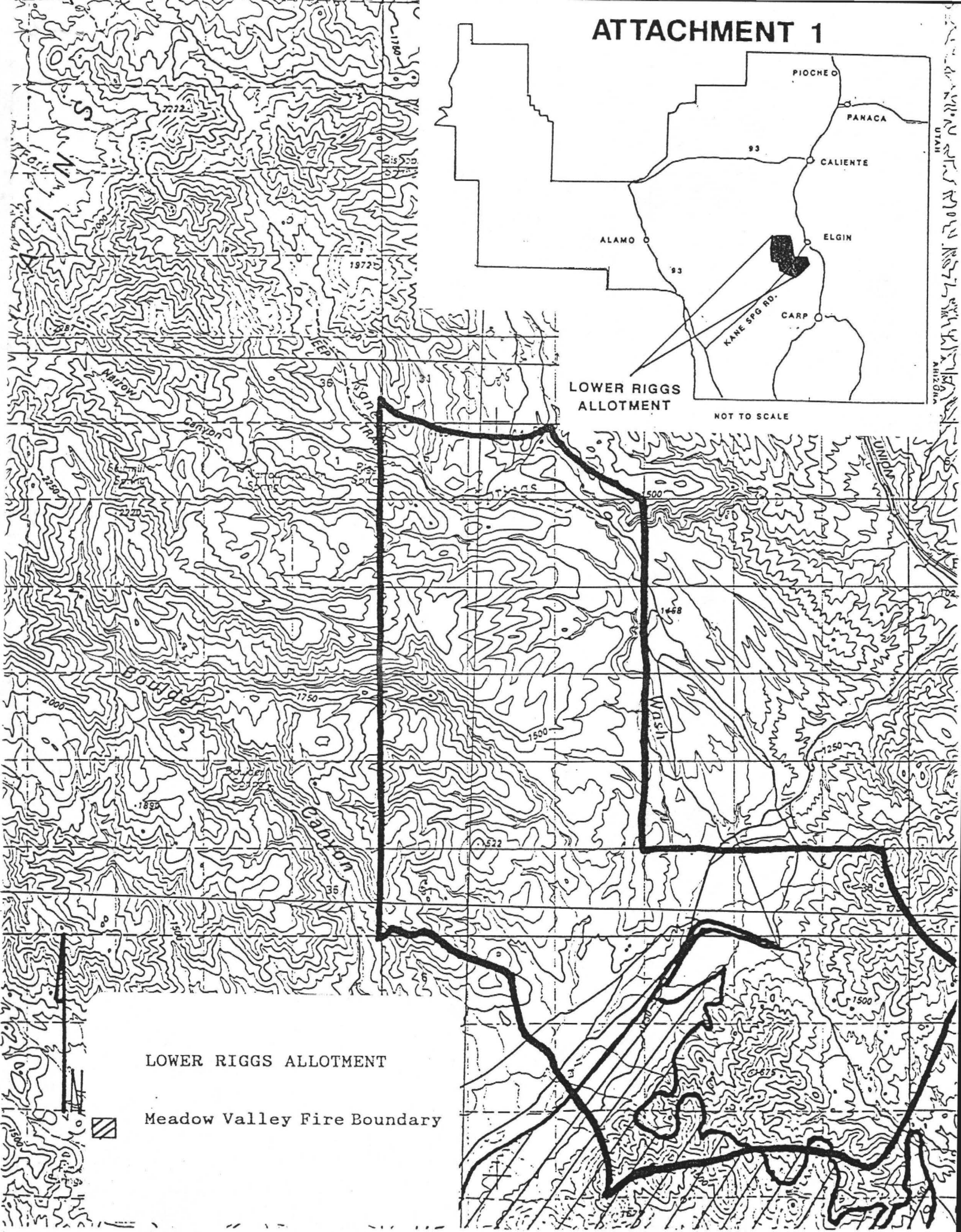
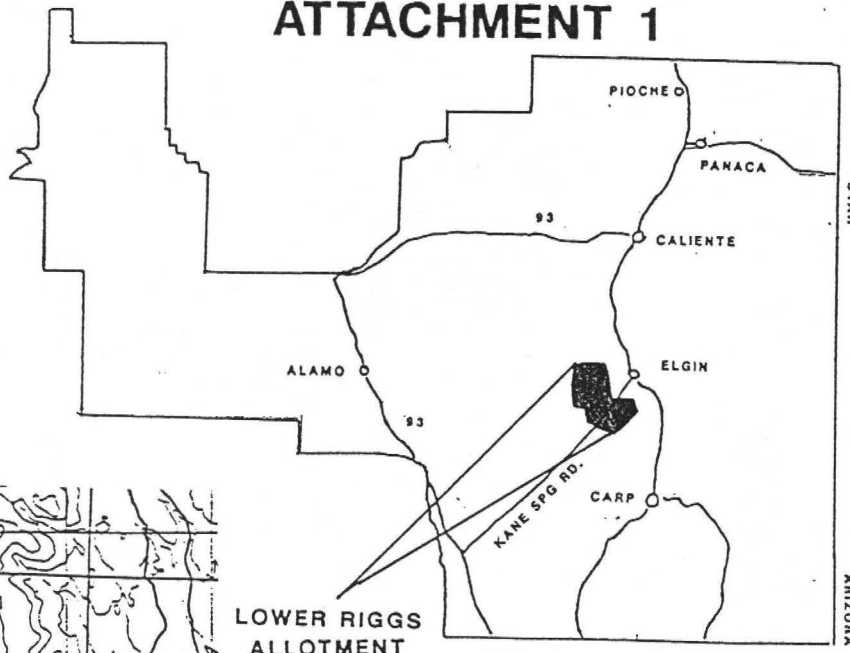
cc:

NV-043

NV-053

Comm. for the Preservation of Wild Horses, C. Barcomb	Certified Mail No. P310374582
Wild Horse Organized Assistance, Inc., D. Lappin	Certified Mail No. P310374583
N-5 Board, Kenneth Lee	Certified Mail No. P310374584
Lincoln County Public Lands Commission	Certified Mail No. P310374585
Lincoln County Commission	Certified Mail No. P310374586

# ATTACHMENT 1



## ATTACHMENT 2

### TERMS AND CONDITIONS FOR THE LOWER RIGGS ALLOTMENT

1. Utilization on the current years growth must not exceed 50% on any one of the key perennial grass species, and 30% in the spring and 50% the rest of the year for any one of the key shrub species within the burn area. If these use levels are reached or exceeded for only one of the key species, the livestock must be removed from and kept out of the burn area. Key grass species are Indian ricegrass, sand dropseed, desert needlegrass, and purple threeawn. Key shrub species are mormon tea, and desert bitterbrush.
2. Grazing fees are due upon issuance of billings. Applications for changes in grazing use must be in written form and received by the Bureau of Land Management Office no later than 15 days prior to the desired date of change. Applications for changes in grazing use which require the issuance of a replacement or supplemental billing notice shall be subject to a ten (10) dollar service charge.
3. Grazing applications will be issued on a yearly basis showing all grazing use as active. if you desire to take all or partial non-use for the grazing year, you must indicate this in writing on your grazing application, along with your reasons.
4. The term Federal grazing permit is subject to cancellation, suspension, or modification for any violation of the Code of Federal Regulations or specified terms or conditions of this permit.
5. When the standards and guidelines are identified in accordance with the new 43 CFR dated August 21, 1995, these standards and guidelines are to be considered part of the terms and conditions of this permit.

### ATTACHMENT 3

The management actions required in the specific terms and conditions for your permit as modified in the October 15 decision were:

- A. "The Meadow Fire Closure Area Specific Terms and Conditions shall remain in effect for a minimum of two years, beginning October 15, 1993 and continuing until monitoring indicates resource objectives for the burn area have been attained."
- B. "You shall continuously herd and manage your livestock away from the burn closure area by riding and controlling livestock access to the water trough located in t. 7 S., R. 66 E., Sec. 4 as identified in Attachment 1."
- C. "Any livestock found within the burn closure area (Attachment 1) shall be removed immediately from the burn area by you. You are to notify the Caliente Resource Area office within 24 hours of such actions."
- D. "Should these practices fail to keep the livestock from the closure area, livestock shall be remove from the allotment immediately. The total closure of the Lower Riggs Allotment to grazing in order to insure protection of the burn area will be implemented by the Bureau of Land Management under the authority of this decision."

The following are the resource objectives for the burn area that must be met prior to opening the closure to livestock grazing on the burn:

- 1. Manage for species diversity of the perennial species endemic to the black brush sites for a minimum of 15 species. Three of the species must be native perennial grass species and their growth form must show good vigor as documented photographically.
- 2. Allow for the reestablishment by seedling and/or resprouting/regrowth of shrub and perennial grass species endemic to the ecological sites burned.
- 3. Manage for a canopy cover (basal and crown cover) of native perennial species with a minimum of 15 percent. Annuals are not included in the cover since most that occur in the area after a burn are introduced annuals such as cheatgrass, red brome and filaree that are not desirable ecologically and are climatically variable in their potential for cover.
- 4. Utilization levels of zero or no measurable use during the closure period. Utilization on the current years growth not to exceed 50 percent on any one of the key perennial grass species and 30 percent in the spring and 50 percent the rest of the year for any one of the key shrubs after the burn is reopened to grazing.

The following Tables 1 and 2 summarize whether or not the livestock grazing decisions' management actions and burn resource objectives identified above were followed and met, respectively:

Table 1

MANAGEMENT ACTIONS ASSESSMENT			
ALLOTMENT	GRAZING DECISION MANAGEMENT REQUIREMENTS		MINIMUM TERM OF ACTION MET YES OR NO
	HERDING OF LIVESTOCK AS NEEDED MET YES OR NO	RESTRICTING WATER ACCESS NEAR BURN AS NEEDED MET YES OR NO	
LOWER RIGGS	<p>YES</p> <p>In the spring of 1995 livestock were noted in the burn near the south allotment fence and the permittee was required to remove cattle off burn. Permittee removed cattle entirely.</p>	<p>YES</p> <p>Livestock access was restricted at the water trough located in T7S R66E Sec. 4.</p>	<p>YES</p> <p>Minimum of 2 Years Close to Grazing</p>

Table 2

RESOURCE DATA ASSESSMENT FOR THE CLOSURE AREA	
RESOURCE OBJECTIVES IDENTIFIED	RESOURCE OBJECTIVES MET YES OR NO AND RESULTS
1. Species diversity of min. 15 with 3 grasses. Good vigor.	<p>1. YES</p> <p>The burned blackbrush sites had between 23 and 26 perennial species overall with 4 native perennial grass species. Excellent vigor documented photographically.</p>
2. Seedling, regrowth, and re-sprout of native species.	<p>2. YES</p> <p>All parameters met. Plants were growing from seed, regrowth and sprouting.</p>
3. Perennial species cover a minimum of 15%.	<p>3. YES</p> <p>Cover for most of the area fell within 24 to 28%. A small area (approx. 20 acres) in a previous burn had 17% cover.</p>
4. Utilization overall of no measurable use during closure period.	<p>4. YES</p> <p>Use in November 1995 was no measurable use. In March 1995, some cattle were on the southern end of burn causing a small area of slight use. Permittee (LCC) removed cattle promptly.</p>

As the above assessments in Tables 1 and 2 show, the grazing decisions' burn management actions were followed and the resource objectives were met. Additionally, the observed trend for the allotment burn was upward based on native plant vigor and diversity.





COMMISSION FOR THE  
PRESERVATION OF WILD HORSES

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

February 14, 1996

Mr. Curtis G. Tucker  
Caliente Resource Area  
Bureau of Land Management  
P.O. Box 237  
Caliente, Nevada 89008

Subject: Protests - Lower Riggs Allotment

Dear Mr. Tucker:

Thank you for considering the issues of the Commission concerning the Lower Riggs Allotment. The addition of terms and conditions to protect the limiting resources of the allotment and burn, assures us that proper management will protect all resources.

We appreciate your attention on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB  
Executive Director