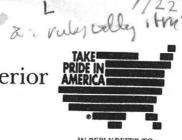


## United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

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



IN REPLY REFER TO:

4130 (NV-040)

JAN 2 2 1997

Dear Interested Public:

On 12/26/96 the Bureau of Land Management, Ely Field Office received a grazing application for the transfer of grazing privileges from the Farm Service Agency to Raymond and Sandy Rosenlund for grazing use on the Maverick Springs, Horse Haven and Ruby Valley Allotments. The Rosenlunds meet all of the qualifications for a grazing permittee outlined in 43 CFR 4110.1 and have offered property in White PIne County, which they own, as base property for the Allotment AUMs.

The Rosenlunds will be offered a term permit which will change the total number of animal unit months of specified grazing use previously authorized. Based on the evaluation of monitoring data, the total number of animal unit months of specified livestock grazing will be adjusted from 599 active AUMs to 416 active AUMs for the Ruby Valley Allotment only. The total number of animal unit months of specified livestock grazing will not change and shall be 1500 AUMs for the Maverick Springs Allotment and 18 AUMs for the Horse Haven Allotment. The terms and conditions will not change and are those which have historically appeared on previous annual licenses or permits authorizing grazing use in these allotments.

Issuance of this term permit complies with the regulations outlined in 43 CFR 4110.2-1, 4110.2-2 and 4110.2-3. The terms and conditions and the impacts of livestock grazing under these terms and conditions are consistent with and have been analyzed in the Egan Resource Management Plan and Environmental Impact Statement.

If you have any questions or comments please provide them within 15 days of receipt of this letter either in writing to Hal Bybee, ADM-Renewable Resources at the address above or by contacting Wendy Fuell, Rangeland Management Specialist at (702) 289-1889. If no allotment specific information pertaining to issues or concerns are received, a term permit will be issued to the Rosenlunds and the transfer will be completed.

Sincerely yours.

Hal M. Bybee, ADM

Renewable Resources



## COMMISSION FOR THE PRESERVATION OF WILD HORSES

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

February 24,1997

Mr. Hal Bybee Ely District Bureau of Land Management HC 33 Box 33500 Ely, Nevada 89301-9408

Subject: Maverick Springs, Horse Haven and Ruby Valley

Dear Mr. Bybee:

The Commission for the Preservation of Wild Horses has reviewed the said transfer of grazing permits. To our knowledge, these allotments have not had allotment evaluations or multiple use decisions. These allotments are within the Buck and Bald Wild Horse Herd Management Areas.

Adjustments in ungulate use are to be based upon rangeland monitoring data. It appears that these transfers were based upon some analysis of data, but the documents were not disclosed.

We are interested in the applied criteria and data that determined the active preference for Ruby Valley Allotment. It is unknown if actual use of the allotment was affected.

Your attention on this matter would be appreciated.

Sincerely,

CATHERINE BARCOMB Executive Director

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I am not sure...Buck and Bald probably had a "Kokman Emergency = Gather" back about 6-7 years ago. BLM is establishing an AML in a = multiple use decision - ONLY ONCE. Despite the changes and further = commitment to monitor range conditions, BLM is not doing its job to = adjust AML's overtime with monitoring data. BLM does everything on the = allotment basis, if some allotments do not have carrying capacities or = horse AUMs - Oh, well. =20

Second issue, assuming there was a gather, BLM should have collected = age, sex, longevity data, composition, etc at the gather. Therefore, the = concerns about restructuring are real and BLM has the data. BLM chose = not to open the door. BLM should have censuses the herd and model its = population with data - Nope!

The letter makes the assumption that BLM must prepare a real = environmental assessment - Not going to happen. The letter also makes = assumptions about how the action will effect the herd and horse behavior = - BLM will escape with the "professional discretion call".