

SEP 21 1984

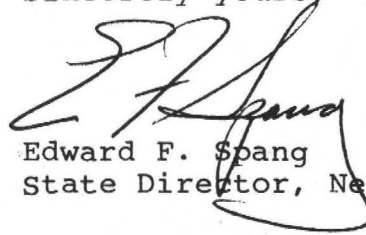
Dear Reader:

Enclosed for your review is the Proposed Egan Resource Management Plan and Final Environmental Impact Statement. The Proposed Plan is a refinement of the preferred alternative presented in the Egan Draft Resource Management Plan and Environmental Impact Statement published in September 1983.

With the exception of certain wilderness recommendations, all parts of this Proposed Plan may be protested. Protests must be filed within thirty days from release of this document (the above date) with the Director of the Bureau of Land Management, 18th and C Streets, N.W., Washington, D.C. 20240 and should contain the following information:

- . The name, mailing address, telephone number, and interest of the person filing the protest.
- . A statement of the issue or issues being protested.
- . A statement of the part or parts being protested.
- . A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the records.
- . A short concise statement explaining precisely why the BLM Ely District Manager's decision is wrong.

Sincerely yours,



Edward F. Spang
State Director, Nevada



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

1792/8500
(N-053)

Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

SEP 20 1984

Dear Reader:

Enclosed is a copy of the Draft Caliente Wilderness Environmental Impact Statement (DEIS). The DEIS analyzes the effects of designating or not designating all or portions of five Wilderness Study areas (WSAs), totalling 588,423 acres, in southern Lincoln and northeastern Clark Counties, Nevada. The goal of this analysis is to recommend for wilderness designation those areas where wilderness is determined to be the most appropriate use of the land and its resources. This analysis involved the evaluation of the potential manageability of wilderness, accessibility of identified mineral values for exploration and development, and the enhancement of such resource values and uses as wildlife habitat, livestock grazing, recreation, cultural resources, and others.

The DEIS describes and analyzes a Preferred Alternative, along with four additional alternatives - All Wilderness, Wilderness Accent, Resource Development and No Wilderness.

This statement was prepared in response to Section 603 of the Federal Land Policy and Management Act of 1976, which directed the Bureau of Land Management to inventory, study, and then report to Congress through the Secretary of the Interior and the President, the public lands suitable for inclusion in the National Wilderness Preservation System.

Except for mineral surveys to be conducted by the U. S. Geological Survey and the U. S. Bureau of Mines on those lands preliminarily recommended suitable for wilderness designation, this document completes the study requirements for the five WSAs in southern Lincoln and northeastern Clark Counties. The preliminary wilderness suitability recommendations will be subject to change during administrative review. The Secretary of the Interior must forward the recommendations to the President by October 21, 1991, and the President must forward them to Congress by October 21, 1993. Only Congress can designate any of the WSAs as wilderness.

Your comments on the environmental consequences of the five alternatives will be appreciated. The comment period will run through January 2, 1985. Comments should be sent to:

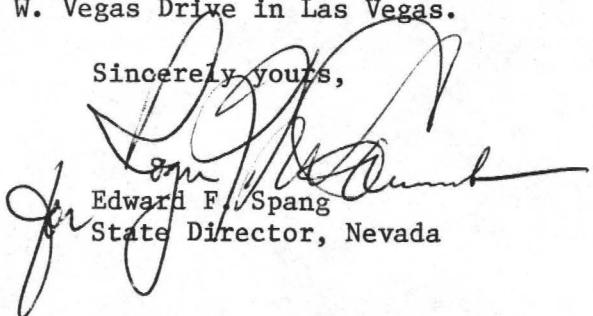
Kemp Conn, District Manager
Attn: Caliente Wilderness DEIS Team Leader
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

Public hearings concerning this DEIS have been scheduled for Wednesday, November 14, 1984 at 7:00 p.m. at the second floor banquet room of the Showboat Hotel, 2800 E. Fremont, Las Vegas, Nevada and for Thursday, November 15, 1984 at 7:00 p.m. at the Caliente City Hall Council Room, Caliente, Nevada. Prior to 4:15 p.m. of the respective hearing days, requests to give oral testimony should be submitted to the Las Vegas District Office at P. O. Box 26569, Las Vegas, NV 89126 or at (702) 388-6403 prior to 4:15 p.m. on November 14, 1984 for the Las Vegas hearing and by 4:15 p.m. November 15, 1984 at (702)726-3141 for the Caliente hearing. Persons giving oral testimony will be limited to 10 minutes. Written comments may be submitted to the above address.

A Wilderness Technical Report has also been prepared, providing supplementary information to the DEIS, and is available on request to the above address.

If you have any questions concerning the DEIS, please feel free to contact either Kemp Conn, District Manager or Frank Maxwell, EIS Team Leader, at (702) 388-6403, or in our offices at 4765 W. Vegas Drive in Las Vegas.

Sincerely yours,



Edward F. Spang
State Director, Nevada

1 Enclosure

Encl. 1 - DEIS (1)

January 17, 1984

Merrill L. DeSpain, District Manager
Bureau of Land Management
SR 5 Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

WFOA submits our comments on the Draft Egan EIS. For many years we have actively displayed our concerns and interest in meaningful management in the District. We very nearly withheld comment, but conscience, anger, and frustration requires some response; whether our comments are considered or not.

BLM appears genuinely concerned regarding litigation by permittees but apparently feels secure that the public trust can continue to be thwarted without response.

It was and is WFOA's belief the purpose of the EIS was to analyze the impacts of livestock grazing on other resource values. BLM has arbitrarily abbreviated the public values to range, reality, and wilderness. All vitally important, but do not complete the entire resource values. How can the public review those resources and the affects of grazing upon them? How can the public be assured that cultural and historical values will be protected by BLM's Standard Operating Procedures, when the public hasn't had the opportunity to review the quantity or quality of those resources?

Proposals for the authorization of three year average licensed use, with substantial reductions in wild horse use fly in the face of laws, court decisions, and data. Paragraph 4 of the Preferred Alternative is totally incorrect and gives the reader the impression that wild horse groups have agreed to horse reductions in Buck and Bald, with current livestock use; this is not true! There is no agreement due to the refusal of the permittee. BLM permits livestock to maintain the status quo until monitoring implies otherwise; an admission by the BLM it does not have the data, or refuses to use data, to reduce overgrazing. Yet, you propose wild horse reductions based on the same data!

BLM implies wild horse/wildlife conflicts by the proposed reduction in horse use only. Presumably you assume that wild horse/wildlife conflicts are due to year round use by horses; yet Zones 1,2,3, and 5 show year round use by livestock!

A substantial number of studies show less wild horse/wildlife conflicts than livestock/wildlife conflicts; yet only horses are to be reduced. If indeed grazing of all types overlap into wildlife habitat and cause dietary competition; then one would assume appropriate reductions in all grazers would facilitate wildlife habitat improvement. However, the simplistic reduction of horses, and increase in acreage use by livestock will result in only short-term improvement. BLM and WHOA is aware that permittees can and do request increases in AUM's up to preferred use, if AUMs are available. Therefore there would be no increase in wildlife AUMs or any improvement in the vegetative resource. Furthermore, studies show horse impact on vegetation around water to be less than with cattle the combination of horse and cattle having a higher impact around water; yet BLM proposes to reduce only horses! ~~Example zone 1, the ratio of cows to horses is 3:1, zone 2, 3:1, zone 3, 10:1, zone 4, 3:1, and zone 5, 5:1, without horse reduction!~~ So the scheme appears to further subsidize the livestock industry at the expense of other public values.

The categorization of allotments, in our opinion, is a subterfuge to convince the public that range management is actually occurring, when in fact, nothing is proposed to address over grazing by livestock, the BLM throwing good tax dollars after bad.

I would commend the Bureau for development of water for wild horses if I believed it, I don't. It wouldn't look too good for a multiple use agency to spend \$347,000 on livestock improvements without throwing in a pitance for wild horses. Other than reduction, the BLM's idea of range improvement; there is no meaningful proposals for habitat improvement for wild horses. I remember a great many seedings where horses were fenced out, even though it was public monies that paid for the seed. I see no alternative such as seedings for wild horses, instead ~~reductions~~, such as is proposed for livestock.

BLM's original fence proposal for Buck and Bald does not lend credence that future fencing will consider the best interests of the horses. Fences benefit no range use other than livestock, and you wouldn't need those if permittees managed their livestock like they say they do. Any fence should be viewed with a critical eye and all stock guards must be modified on horse use areas.

The EIS implies wildlife habitat deterioration; yet proposes a "let-burn" philosophy, which everyone knows promotes grass species for livestock, not browse for wildlife. WHOA ~~does~~ not support existing numbers of wildlife, we support "reasonable numbers of wildlife" as identified by the NDOW. If BLM applied reasonable reductions of grazers, the rehabilitation would result in excess AUMs for wildlife to achieve reasonable numbers.

Current laws provide adequately for community expansion and WHOA sees no purpose served in outright disposal of lands, I believe Congress agrees with us. WHOA supports wilderness. We wonder how you managed a pitiful 200,000 acres out of 4.5 million acres. We request that horse management plans be included in wilderness study areas to be forwarded to Congress for designation. WHOA insists that any water development with public funds have explicit stipulations in the permits for wild horse use; otherwise we will protest them.

Page three
Egan

In conclusion, we support Alternative B, even though we believe it doesn't entirely address over grazing. With this Alternative B, WHOA would consider modest reductions of horses to permit range rehabilitation, with monitoring, until monitoring data can be used to achieve management levels. While there may be individuals within the BLM who recognize and desire true range management, it is apparent by this document, the District would rather make politically expedient management decisions.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: Sierra Club
NDOW
AHPA

Horse
Mg 4730 NW - 033

WNOA submits our comments on the Draft Egan EIS. For many years we have actively displayed our concerns and interest in meaningful management in the District. We very nearly withheld comment on the Egan Draft, but conscience, anger, and frustration requires our response, whether the comments are considered or not.

Bem appears genuinely concerned regarding litigation by permittees but apparently feels secure that the public trust can continue to be thwarted without response from other interests.

It was and is WNOA's belief the purpose of the EIS was to analyze livestock grazing impacts on other resource values. Bem has arbitrarily abbreviated the public values to range, reality, and wilderness. All vitally important, but do not complete the entire resource values. How can the public review those resources and the affects of grazing management on them? How can the public be assured that cultural, and historical resources will be protected by Bem's

Standard Operating Procedures, when the public hasn't the opportunity to review the quantity or quality?

Proposals for the authorization of three year average licensed use, with substantial reductions in wild horse use. Fly in the face of law, court actions, decisions, and data. Paragraph 4 of the Preferred Alternative is totally incorrect and gives the reader the impression that wild horse groups have agreed to horse reductions in Buck + Bald, and current livestock use. This is not true. There is no agreement due to refusal by permittee. BEM permits livestock to maintain the status quo until monitoring data implies otherwise; an admission that BEM does not have data, or refuses to use data, to reduce overgrazing. Yet you propose wild horse reductions based on the same data!

BEM implies wild horse/wildlife conflicts by the proposed reduction in horse use only. Presumably you assume wild horse/wildlife conflicts due to year round use by horses;

yet, Zones 1, 2, 3, and 5 show year
 round livestock use. A substantial
 number of studies show less wild
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 wildlife; yet only horses are to be
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 cause dietary competition; then one
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 in all grazers would facilitate
 wildlife habitat improvement. However
 the simple reduction of horses, an
 increase in use in acreage by livestock
 will result in only short-term
 improvement. The BLM & WAOA is aware
 that permittees then can request an
 increase in AUMs up to preference
 if AUMs are available, therefore no
 increase for wildlife. ~~Just~~

Furthermore, studies show horse
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 combination of horse and cattle impact
 around water to be high; yet BLM
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In Egan zone 1 the ratio of cow to
 horse use is 3:1; zone 2, 3:1 zone 3, 10:1
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horse reduction. So the scheme apparently is to further subsidize the livestock industry at the cost of other public values.

The categorization of allotment, in our opinion, is a subterfuge to convince the public that range management is actually occurring, when actually nothing is proposed to address over grazing by livestock. The BLM instead intends on throwing good tax dollars after bad.

I would commend the Bureau for development of water for horses, if I believed it, I don't. It wouldn't look good for a multiple use agency to spend ~~\$512,000~~ \$347,000 on livestock and not spend any on horses. Other than reduction, BLM's opinion of what is good for horses, the \$30,000 proposed is ~~all you have spend~~ is a drop in the bucket compared to livestock. I remember a great many seeding projects where horses were fenced out, even though the public paid for the seed.

^{original}
BEM's fence proposal in Buck & Bald causes us some concern that future fencing will be in the best interest of the horses. Fences benefit no range use but livestock. Any fence should be viewed with a critical eye and any stock gates must be modified in horse use areas.

The EIS implies wildlife habitat deterioration but proposes a "let-burn" philosophy which everyone knows promotes grass species for livestock, not browse for wildlife. WROA does not support existing numbers of wildlife; we support "reasonable numbers" as identified by NDOW. If BEM applied fair reductions of grazers, the rehabilitation would result in species sums for wildlife to achieve reasonable numbers. ~~It appears BEM enjoy the role of cowboy managers, for steady and surely, the~~

Current laws provide adequately for community expansion and WROA sees no purpose served in outright disposal of lands.

Fallin • Neil-

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We wonder however how you only
managed 200,000 acres out of
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WHAO insists that any waters
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In conclusion, we support
Alternative B, even though it
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alternative, WHOA would consider
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permit range rehabilitation,
with monitoring data used to
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While maybe individuals
may recognize and desire true
range management, it appears
the District would rather make
politically expedient management
decisions.

PROPOSED RESOURCE MANAGEMENT PLAN
AND FINAL ENVIRONMENTAL IMPACT STATEMENT

for the
EGAN RESOURCE AREA

Prepared by the

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELY DISTRICT



Edward F. Spang
Nevada State Director

This Proposed Resource Management Plan is a long-term (20 year) plan to manage 3.8 million acres of public land within the Egan Resource Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that require the Bureau of Land Management to develop land use plans for the public land and to study the suitability of certain lands for wilderness designation. It was developed following a ninety day public review of the Draft Environmental Impact Statement, which described and analyzed six alternatives to guide the overall management of the resource area.

This document is both the Proposed Resource Management Plan and the Final Environmental Impact Statement. Wilderness recommendations in the plan are preliminary and subject to change during administrative review. A separate legislative Final Environmental Impact Statement for Wilderness will be prepared as required by the Bureau's Wilderness Study Policy.

Date final statement was made available to the Environmental Protection Agency and the Public:

SEP 21 1984

Protests - Oct 22, 1984

PREFACE

The Egan Proposed Resource Management Plan and Final Environmental Impact Statement (RMP/FEIS) has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations. This Final RMP/EIS must be used with the Draft RMP/EIS (INT DEIS 83-62). The Final RMP/EIS contains the summary from the draft document, the Proposed Resource Management Plan, revisions and errata of the Draft, written comments received during the public review process, testimony presented at the public hearings and the responses to those comments.

TABLE OF CONTENTS

	Page	
SUMMARY		
Issues	1	
Proposed Resource Management Plan	1	
Changes from Draft to Final	2	
Alternatives in the Draft RMP/EIS	3	
CHAPTER 1: PLANNING ISSUES AND CRITERIA		
Purpose and Need	11	
Issues and Criteria	12	
CHAPTER 2: PROPOSED RESOURCE MANAGEMENT PLAN		
Proposed Resource Management Plan	19	
Implementation	21	
Standard Operating Procedures	25	
Maps		
Potential Utility Corridors	29	
ORV Designations	30	
Revisions and Errata	31	
CHAPTER 3: AFFECTED ENVIRONMENT		
Wildlife	35	
Minerals and Energy	35	
Water Resources	37	
Cultural Resources	38	
Off-Road Vehicles	39	
Revisions and Errata	40	
CHAPTER 4: ENVIRONMENTAL CONSEQUENCES		
Water Resources	43	
Cultural Resources	43	
Off-Road Vehicles	43	
Revisions and Errata	45	
CHAPTER 5: LIST OF PREPARERS		49

CHAPTER 6: PUBLIC COMMENTS/BLM RESPONSES

Consultation and Coordination 53
Availability of Plan 55
Summary of Public Comments and Responses 57
Public Comment Letters and Testimony 65
Responses 199

APPENDICES

Appendix 1: Comparative Review of the Six Alternatives . . 229
Appendix 2: Initial Livestock AUM Levels 233
Appendix 3: Vegetation Type Acreages 241
Appendix 4: Seral Stages for the Proposed Plan 242
Appendix 5: Existing and Proposed AMPs 254
Appendix 6: Categorization of Allotments 255
Appendix 7: Streams and Stream Condition 265
Appendix 8: Comparative Analysis of Long Term Impacts . . . 268
Revisions and Errata 270

GLOSSARY 275
Revisions and Errata 276

REFERENCES 279

SUMMARY

SUMMARY

INTRODUCTION

The Bureau of Land Management is proposing to implement a Resource Management Plan (RMP) for the Egan Resource Area of the Ely District, Nevada. The Egan Resource Area encompasses approximately 3.8 million acres of public land in east central Nevada. The majority of the resource area is located in White Pine County. Portions of the resource area are also located in Nye and Lincoln Counties.

The Egan Resource Management Plan is designed to provide management direction to resolve three issues concerning the management of the public lands.

The Draft Egan Resource Management Plan/Environmental Impact Statement identified a preferred and five other alternatives and analyzed the impacts of each. This document, the Egan Proposed Resource Management Plan and Final Environmental Impact Statement identifies the proposed plan (a combination of the preferred alternative and public comments).

ISSUES

The Egan Resource Management Plan will be addressing the three issues listed below:

1. Range Management
2. Realty Actions
3. Wilderness Study Areas

The Egan Resource Management Plan is specifically tailored to provide management direction for these issues. Issues and land use decisions concerning such resource uses as minerals, cultural, and recreation are covered in Table 1, "Summary of Management Actions" and will be handled through normal administrative procedures. Decisions

affecting these resources will still be guided by the Federal Land Policy and Management Act of 1976 (FLPMA), the National Environmental Policy Act of 1969 (NEPA), and the National Historic Preservation Act of 1966.

This Resource Management Plan contains only preliminary wilderness recommendations. Wilderness is treated differently than the other resources because it is Congress that will make the final decisions on which, if any, of the wilderness study areas are designated as wilderness. A separate final wilderness environmental impact statement will be filed by the Secretary of the Interior at a later date. It will contain information drawn from this Resource Management Plan and the accompanying Egan Wilderness Technical Report.

PROPOSED RESOURCE MANAGEMENT PLAN

The objective of this plan is to emphasize a balanced approach to land management, protecting fragile and unique resources, while not overly restricting the ability of other resources to provide economic goods and services.

Comparison of proposed management actions and current management is displayed in Table 1.

Rangeland Management

Initially authorize livestock use at the three year average licensed use, which is 123,461 AUMs (Animal Unit Months). The three year average use is used for analysis only and would not be required as a stocking rate. Any permittee may activate his nonuse at any time unless emergency conditions such as fire or flood were to preclude it. However, BLM will negotiate with individual

permittees to establish initial livestock levels and this three-year average will be a figure which BLM will strive to have each permittee agree with.

Existing rangeland monitoring studies would continue and new studies would be established as needed. Monitoring studies would be used to determine what adjustments in livestock and wild horse use would be necessary to meet management objectives.

Wild horses would be managed at 1,451 animals in the following herd use areas: Sand Springs, 494; Monte Cristo, 96; Buck and Bald, 700; Butte, 60; Cherry Creek, 11; Antelope, 14; Jake's Wash, 20; White River, 20; Diamond Hills, 36. These numbers are the levels inventoried in 1982-83, with the exceptions of Monte Cristo (an approved management plan) and Buck and Bald (the level established in 1981).

Habitat would be managed for existing levels of wildlife species. Reintroductions of big game species would be accomplished in cooperation with the Nevada Department of Wildlife, where such reintroductions would not conflict with existing uses and if sufficient forage is available.

Realty Management

Lands which would be disposed of are those lands whose disposal would provide for more effective management of the public lands in the resource area. These lands are not in big game or upland game habitat or in wild horse herd management areas. This would amount to disposal of up to 39,555 acres. All land disposal would be done in a planned and orderly manner. Other lands may be appropriately applied for at a later date under one of several methods, including Recreation and Public Purposes Applications, direct sales, exchanges, and Desert Land Applications.

Two utility and transportation corridors would be designated, one running north and south, and one running east and west. Two others would be planned, one running north and south and one running east and west.

Wilderness Study Areas

Portions of three wilderness study areas would be recommended as suitable for possible wilderness designation. Areas

with the lowest wilderness quality were dropped. Important conflicts and manageability problems were excluded, but minor ones were excluded only in combination with other conflicts or problems, or apparent unnaturalness of an area. This would total 106,598 acres recommended for wilderness designation. Wilderness recommendations made in the proposed resource management plan are preliminary and subject to change during administrative review. A separate final legislative environmental impact statement will be prepared for the wilderness study recommendations.

CHANGES FROM THE PREFERRED TO THE PROPOSED (FINAL)

In the Egan Draft RMP/EIS a Preferred Alternative was identified. In this document, however, that alternative now becomes the Proposed Resource Management Plan. In the case of the Egan RMP, because of public comments on the draft, there were a number of changes made and these changes are as follows:

1. Land Disposal - Acres identified for disposal were changed from 79,888 acres to 39,555 acres. This was done because of public comment and it would be more effective management if these 39,555 acres were no longer in public ownership.

2. Utility Corridors - The proposed utility corridor in Butte Valley was dropped and a short segment was added over the Butte Mountains. This was done because of resource conflicts and public comment.

3. ORV Designations - While the balance of the resource area will remain open to ORV use, the northern portion of the Riordon's Well WSA and the central portion of the South Egan Range WSA will be designated as limited, which will allow vehicles to continue to use existing roads and trails. This was done because of the damage presently occurring from ORV use.

4. ACEC Designations - Although there were no ACEC's (Area of Critical Environmental Concern) proposed in the draft, a number of public comments were received suggesting possible candidates. However, we are not proposing any ACEC designations in this document, primarily because of the lack

of accurate field information. We have tentatively identified two areas, a bristlecone pine area in the Egan Range and a swamp cedar area in White River Valley, which may be excellent potential candidates for ACEC designation and these will be closely examined in the future. Until more information is received and reviewed, designation may be untimely.

ALTERNATIVES DISCUSSED IN THE EGAN DRAFT RMP/EIS

The Egan Draft Resource Management Plan contained a Preferred Alternative and five other alternatives for how the Egan Resource Area should be managed. Each alternative, provided a different approach to how the resource area should be managed, varying from no action; and resource protection, to resource development. The theme for each alternative is discussed below. Appendix 1 of this document lists the levels of livestock use by allotment by alternative. These were the figures used to determine impacts in the Egan Draft RMP/EIS. Appendix 1 also lists some priority projects proposed in the draft document.

A comparison of the various alternative levels, by management action is displayed in Appendix 1.

Preferred Alternative: This alternative emphasizes a balanced approach to land management in the resource area. Fragile and unique resources would be protected while not overly restricting the ability of other resources to provide economic goods and services. It is a combination of various alternatives.

Alternative A: This alternative represents a continuation of present resource management uses and levels. The resource area would continue to be managed without a long-range plan and actions would be determined on a case-by-case basis as circumstances and/or public demand dictate.

Alternative B: This alternative is oriented toward preservation of natural values, with emphasis on protecting wildlife and riparian habitats, wild horses, and wilderness values.

Alternative C: This alternative is designed to provide a wide variety of goods and services to the public within the sustained use capabilities of the Egan Resource Area.

Alternative D: This Alternative is designed to emphasize the management of those resources contributing to the commercial well-being of the resource area.

Alternative E: This alternative is designed to emphasize the protection of natural values through the removal of all livestock grazing from public lands.

RELATIONSHIP OF THE PROPOSED PLAN TO NATIONAL ENVIRONMENTAL POLICY (NEPA) GOALS

Section 101 of NEPA outlines a national environmental policy that all federal agencies must carry out. To do this agencies must use all practicable means to ensure that their actions fulfill six goals. This Proposed Plan has been developed to, among other things, meet those six goals.

The objective of this Proposed Plan is to emphasize a balanced approach to land management, protecting fragile and unique resources, while not overly restricting the ability of those resources to provide economic goods and services. The relationship of the Proposed Plan to the six NEPA goals is, in broad terms, as follows:

Goal 1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.

- (a) The Proposed Plan fulfills trustee responsibilities by providing, among other things, for an intensive study of two areas of potential critical environmental concern; by making provisions for protecting, maintaining and/or improving the basic resources of soils, water and air; and by proposing specific areas as preliminarily suitable for wilderness designation.

Goal 2. Ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.

- (a) The Proposed Plan protects fragile and unique resources while enhancing the opportunities of other resources to provide economic goods and services.

Goal 3. Attain the widest range of beneficial use of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences.

- (a) The Proposed Plan makes provision for a balanced use of existing resources among competing user groups while promoting a healthy, productive environment. Plan monitoring will assure that undesirable or unintended consequences are either (a) avoided, or (b) minimized.

Goal 4. Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, whenever possible, an environment which supports diversity and variety of individual choice.

- (a) The Proposed Plan provides for the identification, selection, and management of areas showing natural uniqueness, representativeness, and quality to assist in the development of a nation-wide, maximally diverse system of natural resources for scientific study in which cultural resource inventories, protection, and diversity of individual choice are assured.

Goal 5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities.

- (a) The Proposed Plan provides a balanced management approach designed to protect fragile and unique resources without unduly restricting the ability of other resources to enhance both the social and economic viability of the resource area.

Goal 6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

- (a) Renewable resources such as vegetation and wildlife would be enhanced by implementation of the Proposed Plan. The Proposed Plan would not affect the recycling of depletable resources.



EGAN RESOURCE MANAGEMENT PLAN

TABLE 1
SUMMARY OF MANAGEMENT ACTIONS

Resource	Current Management	Proposed Resource Management Plan
ACECs	No designated ACECs. ACEC nominations will be handled on a case-by-case basis.	Intensively study two areas for potential ACEC designation, including an area of bristlecone pine in the Egan Range and an area of swamp cedar in the White River Valley. Future nominations will continue to be handled on a case-by-case basis.
Air Quality	Protect and maintain the high air quality in the area. Recommendations on projects made to protect the air quality are done on a case-by-case basis.	Same as current management.
Corridors	Rights-of-way applications would be processed on a case-by-case basis. Utility and transportation corridors would not be designated.	Two utility and transportation corridors are existing, one running north and south, and one running east and west. Two others would be planned, one running north and south and one running east and west.
Cultural Resources	Cultural resource inventories and protection are performed in response to individual surface disturbing projects. Standard and special stipulations are applied on a case-by-case basis.	In addition to current management, increase the level of cultural resources management to provide for analysis, interpretation and public awareness.
Energy	<p>The lands in the Egan Resource Area are classified as follows according to availability for leasing and development:</p> <p>Open to leasing with standard, non-restrictive stipulation - 2,060,556 ac's.</p> <p>Open with seasonal closures or mildly restrictive stipulations - 1,464,960 ac's.</p> <p>Open with seasonal closures or no-surface-occupancy stipulations - 264,960 ac's.</p> <p>Closed to leasing. - 51,840 ac's.</p>	<p>Designation of the above WSAs would result in 106,598 acres being closed to mineral leasing (subject to valid existing rights).</p> <p>Current management would continue on the remaining acres.</p>

Resource	Current Management	Proposed Resource Management Plan
Fire Management	Complete fire suppression would continue. There would be no development of fire management plans. Fire would not be used as a management tool.	A fire management plan would be developed which emphasizes fire as a resource management tool, and allows for limited suppression in some instances. It would be used to improve habitat and to increase available forage.
Forestry	Present management is to respond to demand within the limits of sustained yield. Current demand is for Christmas trees, pinenuts, post/poles and firewood (both green, and dead and down). 409,616 acres out of approximately 1,426,000 acres of woodland are currently suitable for the production of some forest products.	Continue to manage those areas, which are economically feasible for harvest, to obtain the allowable cut and maintain the sustained yield. Some acreage may be lost in the future due to wilderness designation, land transfers, and range projects.
Minerals	All but 7,200 acres of the Egan Resource Area are open to mineral entry. Mineral management is handled on a case-by-case basis. Cumulative impacts are not considered.	Designation of wilderness study areas would result in about 101,000 acres being withdrawn from mineral entry (subject to valid and existing rights). Current management would continue on the remaining acres.
Natural History	The current program policy, which utilizes Research Natural Areas, Experimental Preserves and other related management tools, mandates the identification, selection, and management of areas showing natural uniqueness, representativeness, and quality to assist in the development of a nation-wide, maximally diverse system of natural resources for scientific study.	Same as current management.
Off-Road Vehicles	No ORV designations. All lands currently open to ORVs with no restrictions.	Leave all lands open to ORV use, with the exceptions of the northern portion of the Riordan's Well WSA and the central portion of the South Egan Range WSA. ORVs would be limited to existing roads and trails in these two portions of these WSAs.
Paleontological Resources	Based on a resource potential classification system, paleontological resources are identified and protected on an individual project basis.	Same as current management.
Range	License livestock use at a level requested by permittees (up to preference) and develop no AMPs or substantial range improvements.	Initially authorize livestock use at 123,461 AUMs (three-year average) develop AMPs and increase monitoring on all "I" allotments. AMP would contain grazing systems and range improvements.

Resource	Current Management	Proposed Resource Management Plan
Realty	Land disposal is considered on a case-by-case basis.	Up to 39,555 acres of land may be disposed of over a 20-year period. It will be more effective management to dispose of these lands.
Recreation	Manage for dispersed, undeveloped recreation, preparing a cave management plan for cave resources.	In addition to current management, greater emphasis in visitor services and public awareness. Special attention to recreation potential in the South Egan Range.
Soils	Protect, maintain or improve the quality of the soil resource. Recommendations on project restrictions to protect soils are made on a case-by-case basis.	Same as current management.
Threatened and Endangered Species	Follow standard operating procedures concerning T & E species.	Incorporate T & E species needs, into all activity plans and continue standard operating procedures on all projects.
Vegetation	Provide sufficient forage for all range users.	Vegetation would be managed to increase those species of plants needed for livestock, wild horses, wildlife, and watersheds. Same as current management.
Visual Resource Management	Identify concerns and mitigating measures early in project planning.	Improve sensitive watersheds with intensive management practices implemented by other resource programs.
Water Resources	Protect, maintain, or improve the quality of the water resource. Recommendations on project restrictions to protect water quality and quantity are made on a case-by-case basis.	Portions of three WSAs totalling 106,598 acres would be recommended as preliminarily suitable for wilderness. Some wilderness values will be lost in the South Egan Range and Goshute Canyon.
Wilderness	No designated wilderness. Temporary protection for wilderness resource currently exists, but current management cannot be continued.	Portions of three WSAs totalling 106,598 acres would be recommended as preliminarily suitable for wilderness. Some wilderness values will be lost in the South Egan Range and Goshute Canyon.
Wild Horses	Wild horses will be managed at 1,936 animals in the nine horse herd use areas.	Wild horses would be managed at 1,451 animals in the nine horse herd use areas. A herd management plan will be drafted for the Buck and Bald herd in 1984.

Resource	Current Management	Proposed Resource Management Plan
Wildlife	Habitat is managed for existing levels of wildlife species. Reintroductions will be on a case-by-case basis. The two habitat management plans approved in the Resource Area will be implemented as funds become available.	Habitat would be managed for reasonable numbers of wildlife species. Reintroductions of big game species would be accomplished in cooperation with Nevada Department of Wildlife, where such reintroductions would not conflict with existing uses and if sufficient forage is available. Habitat management plans will be completed on all wildlife habitat areas within the resource area.

CHAPTER 1

Planning Issues and Criteria

CHAPTER 1

Planning Issues and Criteria

PURPOSE AND NEED

Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) states "The Secretary shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands." The guidance for preparing this plan, which is known as a Resource Management Plan (RMP), is contained in 43 CFR Part 1600, Public Lands and Resources; Planning, Programming, and Budgeting.

The National Environmental Policy Act of 1969 (NEPA) requires Federal agencies to prepare statements documenting the environmental consequences of Federal actions significantly affecting the human environment. Resource management plans qualify as significant actions and thus require the preparation of an environmental impact statement (EIS). The Council on Environmental Quality's Regulations for Implementation of the Procedural Provisions of the National Environmental Policy Act (40 CFR Part 1500) provide guidance for the preparation of environmental impact statements. This document combines the proposed resource management plan and its environmental impact statement into an integrated package.

The objective of this plan is to improve resource management decisions on public lands through a process of resource management planning that includes participation by the public and Federal, State and local governments, maximizing use of the best available data, and analysis of alternatives. Resource management plans are designed to guide and control future management actions and the development of

subsequent more detailed and limited scope plans for resources and uses.

The Egan Resource Management Plan is designed to provide a framework for future management of the public lands and resources in the Egan Resource Area. This framework will be established by determining which resources will be given management emphasis. This will be consistent with existing legislation, regulations, and the policy of management of public lands on the basis of multiple use and sustained yield. This will be done "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmosphere, water resource, and archaeological values" (FLPMA, Sec. 102 (a)(7) and (8)).

In addition to meeting the planning needs for the Egan Resource Area, this RMP also fulfills other specific objectives. Section 603 of the same act requires the Secretary of the Interior to review roadless areas of 5,000 acres or more in size for wilderness characteristics and report to the President his recommendations as to the suitability or nonsuitability of each such area as wilderness. This proposed RMP/EIS includes an evaluation of four wilderness study areas as required by FLPMA. Through study of the alternatives, the value of these WSAs for wilderness or other uses was determined and the consequences analyzed in the draft document. In accordance with BLM policy the following procedure was used in addressing environmental concerns pertaining to wilderness designation. Environmental impacts of wilderness designation were incorporated into the Bureau planning process through the draft RMP stage. The draft document presented the impacts to wilderness and other resources by alternative in summary form. Comments received on that document on wilderness will be presented in a Preliminary Final Egan Wilderness EIS and in this

document. The Wilderness EIS will be submitted through the BLM Director and Secretary of the Interior to the President. The recommendations contained in this final wilderness EIS and the RMP will be preliminary because they are subject to change by the BLM Director, Secretary of the Interior or President before they are presented to Congress for legislative action. More detailed wilderness information and analysis was incorporated into the Egan Wilderness Technical Report which is available on request for those who desire more information.

A suit was filed in 1973 in Federal Court alleging that the Bureau of Land Management's programmatic grazing environmental impact statement did not comply with the National Environmental Policy Act. As a result of the settlement of this suit, BLM agreed to prepare specific grazing EISs. The resource management plan will meet this objective.

Finally, the resource management plan will also identify lands which will be made available for disposal to consolidate ownership for improved management and to meet other important public objectives.

THE PLANNING PROCESS

The Egan Resource Management Plan is being prepared in accordance with the Bureau of Land Management's planning regulations (43 CFR 1601). The process consists of the following nine steps: 1) identification of issues; 2) development of planning criteria; 3) collection of inventory data and information; 4) analysis of the management situation; 5) formulation of alternatives; 6) estimation of effects of alternatives; 7) selection of preferred alternative (draft plan/EIS); 8) selection of the proposed resource management plan, and 9) monitoring and evaluation.

In July 1981 an interdisciplinary team was established to prepare this document.

ISSUES AND CRITERIA

Resource management plans are limited to issues which are of major concern and importance to the BLM and the public it serves.

Cultural resources and threatened and endangered species are considered under standard operating procedures. Range improvements are discussed in the specific proposals for livestock grazing under the proposed resource management plan.

The three planning issues described in this chapter are the heart of this plan. The Egan Resource Management Plan is designed to resolve these issues. Other resource uses not expressly included as an issue will be managed under the principles of balanced multiple use management. Implementation actions will be guided by the Consistency requirements (43 CFR 1610.3-2) and Conformity and Implementation provisions of 43 CFR 1610.5-3. Further decisions affecting these resources will still be guided by the Federal Land Policy and Management Act of 1976 (FLPMA), and the National Environmental Policy Act of 1969 (NEPA).

Decision Criteria

The objective of the preferred alternative will be to emphasize a balanced approach to land management, while protecting fragile and unique resources, and yet not overly restricting the ability of other resources to provide economic goods and services. Selection of the management actions for this alternative will be based on those management actions which provide for:

1. Public land areas will host multiple uses, except where a single use is in the public interest.
2. The renewable resources of the public lands will be managed on a sustained-yield basis.
3. The resource management plan will be consistent with the planning and management programs of other federal agencies, state and local government and Indian tribal governments except where they conflict with the Bureau of Land Management's legal mandate.
4. The appropriate level of management for each livestock grazing allotment will be determined by following a selective management approach. Following this concept, allotments will be segregated into resource management categories

according to the following renewable resource, economic, and management criteria: (a) range condition, trend, and potential for improvement or deterioration in vegetation productivity, (b) resource conflicts, (c) opportunity for improvement through intensive rangeland management, (d) potential benefit from rangeland improvement projects, (e) size of allotment, and (f) cost effectiveness of implementing range improvements.

As existing range survey information is either old or incomplete, future stocking rate adjustments, if any, will normally be based upon the rangeland monitoring program. In cases where existing range monitoring data demonstrates the need for adjustments, stocking rates may be altered following the procedures contained in the grazing regulations (43 CFR, part 4100).

5. The maintenance of the basic soil and vegetation resources will be given a high priority.
6. The economic health and stability of the livestock industry will be considered.
7. The proposed plan will contain actions to maintain viable and healthy herds of wild horses.
8. Long-term management of wild horse herds will seek to maintain their wild and free-roaming character.
9. The proper management of riparian habitat will be given a high priority.
10. Actions to protect and enhance big game, upland game, waterfowl, fish, and non-game wildlife habitat will be considered.
11. Habitat considered critical to federally-listed threatened or endangered animal and plant species and state-listed sensitive species will be protected.
12. The proposed resource management plan will only recommend areas as suitable for wilderness designation those areas

which possess the following characteristics.

- a. Where the wilderness values and the public's benefit derived through the wilderness values more than offsets the benefits which would be foregone due to wilderness designation.
 - b. Recommended areas must be manageable as wilderness over the long-term.
 - c. Wilderness designation would contribute to the diversity of the National Wilderness Preservation System.
13. A realty management program that is efficient in terms of BLM management costs, and which provides for community expansion, agricultural development, utility corridors, recreation, and other public purposes.
 14. In the case of lands in close proximity to population centers and significant economic and agricultural developments, priority will be given to community expansion, recreation and other public purposes.
 15. Lands suitable for agriculture which do not have a high priority for other uses, such as community expansion, recreation, or public purposes will be considered for disposal for agricultural purposes.
 16. The utility corridor configuration proposed in the proposed plan will be that which best meets utility and transportation development needs and which has the least impact on multiple-use management.

PLANNING ISSUE NUMBER 1

The Bureau of Land Management is responsible for administering the rangeland vegetation. This responsibility includes protecting the integrity and productivity of the vegetation resource, while making vegetation and habitat available for livestock, wild horses, and wildlife. One aspect of this responsibility

is the management of the range. To meet this responsibility the BLM will develop range management practices based on the concepts of sustained yield and multiple use.

Planning Questions Related to Issue Number I

1. How can the vegetation resources be managed under the "Rangeland Management Policy" for the benefit of livestock, wild horses and wildlife? Under the "Rangeland Management Policy" similar allotments would be identified as belonging to one of three categories, for which the objective would be to: maintain current satisfactory condition; improve allotments in unsatisfactory condition; or to manage allotments custodially, while still protecting the existing resources values.

2. How can range use be administered to protect and improve riparian areas to good or better condition as required by existing Executive Orders?

3. How can fire management be used to modify vegetation for the benefit of livestock, wild horses, and wildlife?

Planning Criteria Related to Issue Number I

Inventory Criteria: 1. Use the monitoring procedures established in 1981 by the Nevada Range Studies Task Group to obtain range data. 2. Identify wild horse herd areas. 3. Obtain actual use data. 4. Determine migration routes, habitats, winter ranges and desired population levels for wildlife from the Nevada Department of Wildlife. 5. Gather social and economic information relating to the effect of range management on the ranching industry and the local community. 6. Identify management conflicts associated with the range management program. 7. Analyze fire reports to determine fire occurrence, the rate of spread for fire and the resource values which may be destroyed. 8. Identify range improvement needs.

Criteria for Estimating Effects: The impact of the proposed alternatives on the environment will be based on the implied legal, social, economic, biological and physical consequences (positive and negative).

PLANNING ISSUE NUMBER II

Eighty-five percent of the land within the Egan Resource Area is administered by the Bureau of Land Management. Possible future economic opportunities include the White Pine Power Project, agricultural development, and the continued expansion of the mining industry. Should these economic opportunities begin to materialize, additional people will be attracted to the region. The BLM has a responsibility, as the need arises, to assure that the public lands are available for community expansion, agricultural development, utility corridors, and other public purposes. It is also more effective management to dispose of these lands.

Planning Questions Related to Issue Number II

1. Which lands could be disposed of to improve the management of the public lands?

2. Which lands are suitable to be disposed of for development by private and other public entities?

3. Various utility companies have proposed a series of utility corridors through the Ely District. Where and how many utility corridors should be planned?

Planning Criteria Related to Issue Number II

Inventory Criteria: 1. Identify lands suitable for disposal and utility corridors.

Criteria for Estimating Effects: The impact of the proposed alternatives on the environment will be based on the implied legal, social, economic, biological and physical consequences (positive and negative).

PLANNING ISSUE III

Four areas with wilderness characteristics are located largely or entirely within the Egan Resource Area. They are: Goshute Canyon (NV-040-015), Park Range (NV-040-154), Riordan's Well (NV-040-166), and the South Egan Range (NV-040-168). A wilderness study will be conducted to determine if wilderness preservation is the highest and best use of these areas.

Planning Questions Related to Issue

Number III

1. What wilderness values do these areas have?
2. What other resource values occur in these areas and what is the significance of the conflict between these and wilderness designation?
3. Can the proposed wilderness areas be managed as wilderness over the long term?

Planning criteria Related to Issue

Number III

Inventory Criteria: 1. Obtain public input. 2. Assemble existing wilderness inventory data on the mandatory wilderness characteristics (size, naturalness, and outstanding opportunities for solitude or primitive recreation) and the supplemental values (ecological, geological, or other features of scientific, educational, scenic, or historical value) present in each wilderness study area. 3. Gather social, economic, and mineral data to evaluate highest and best use of wilderness study area.

Criteria for Estimating Effects: The impacts of the proposed alternatives on the environment will be based on the implied legal, social, economic, biological, and physical consequences (positive and negative).

OFF-ROAD VEHICLE DESIGNATION

Off-road vehicle use allocation did not emerge as an issue during scoping for the Egan Resource Management Plan. However, off-road vehicle designations will be done through the planning process for the Egan Resource Area in compliance with Executive Orders 11644 (Use of Off-Road Vehicles on Public Lands) and 11989 (Off-Road Vehicles on Public Lands).

Public lands within the Resource Area must be designated either open, limited or closed to off-road vehicle use. Constraints on off-road vehicle use need to be based on identifiable and defensible concerns. An undefined "potential" for off-road vehicle use damage is not adequate justification for constraints on off-road vehicle use. Damage must be shown to be occurring or imminent.

To evaluate the necessity and appropriateness of constraints on off-road vehicle use, inputs were solicited from all Ely District resource specialists during August of 1982. While some off-road vehicle conflicts and potential for damage were identified, no restrictions on off-road vehicle use were proposed at that time. In instances where specialists had concerns for potential damage, they felt that resource protection could be accomplished with "open" off-road vehicle designations through alternate strategies. These consist of emergency closures for areas endangered by vehicle use; use of the Environmental Assessment process and specialist review for authorizing organized, competitive off-road vehicle events; field monitoring of fragile and environmentally sensitive areas; and eventual limitations on off-road vehicle use through the designation process.

The Interim Management Policy and Guidelines for Lands Under Wilderness Review, states that, "No lands will be designated as 'closed' solely because they are under wilderness review, but if increasing impacts threaten to impair wilderness suitability, the BLM will move to control those impacts and may designate the area as 'closed' to the types of vehicles causing the problem...". It was recently discovered that there indeed has been some damage from ORVs to portions of two WSAs. The northern portion of the Riordan's Well WSA and the central portion of the South Egan Range will be designated as "limited", which will allow vehicles to continue to use existing roads and trails. The remainder of the resource area will be designated "open."

MINERAL AND ENERGY RESOURCES MANAGEMENT

Mineral resources management was not included as a planning issue because the Bureau's mineral resources policy provides that, the public lands shall remain open and available for mineral exploration and development unless withdrawal or other administrative action is clearly justified in the national interest. The existing situation for minerals and energy resources is discussed in Chapter 3 of this document. The minerals and energy resources were discussed in more detail under the wilderness sections in the draft document and the impacts were addressed indirectly in the impact analysis section.

CHAPTER 2

PROPOSED RESOURCE MANAGEMENT PLAN

CHAPTER 2

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PROPOSED RESOURCE MANAGEMENT PLAN

Objective

The objective of this plan is to emphasize a balanced approach to land management, protecting fragile and unique resources, while not overly restricting the ability of other resources to provide economic goods and services.

Management Actions

RANGELAND MANAGEMENT

Short-term Actions (0-5 years)

1. Initially authorize livestock use at the three year average licensed use, which is 123,461 AUMs (Animal Unit Months). The three year average use is used for analysis only and would not be required as a stocking rate. Any permittee may activate his nonuse at any time unless emergency conditions such as fire or flood were to preclude it.
2. Range Improvement projects would be developed which emphasize the greatest return on investment in relationship to resource needs. A list of priority projects, by allotment, can be found in Appendix 2.
3. Continue existing rangeland monitoring studies and establish new studies as needed. Monitoring studies would be used to determine if adjustments in livestock and wild horse numbers were necessary.
4. Wild horses would be managed at 1,451 animals in the following herd use areas: Sand Springs, 494; Monte Cristo, 96; Buck and Bald, 700; Butte, 60; Cherry Creek, 11; Antelope, 14; Jake's Wash, 20; White River, 20; Diamond Hills, 36. The Monte Cristo

Herd Management Area would be managed at 96 animals in accordance with an approved management plan; small portions of the Diamond Hills, Cherry Creek, Antelope, and White River wild horse herds occur in the Egan Resource Area, but would be managed by other resource areas (Shoshone-Eureka, Wells, and Schell) containing the bulk of the herds; the Buck and Bald Herd Management Area would be managed at approximately 700 animals which is an interim level established through a gathering plan and environmental assessment written in 1981; the remaining herds would be managed at the 1982-83 levels; and studies would be undertaken in 1984, in conjunction with BLM (Battle Mountain District) to determine the accuracy of the existing boundary of the Diamond Valley Herd Management Area.

5. Monitoring efforts would be intensified on riparian areas. Where management objectives are not being obtained through application of management practices, fencing will be considered.
6. A resource area-wide fire management plan would be developed which allows a broad spectrum of uses. Fire would be used as a tool when it is the most effective and efficient method for improving habitat and increasing available forage.
7. Habitat would be managed for reasonable numbers of wildlife species. Reintroductions of big game species would be accomplished in cooperation with the Nevada Department of Wildlife, where such reintroductions would not conflict with existing uses and if sufficient forage is available. Habitat management plans would be completed on all wildlife habitat areas within the resource area.
8. All vegetation would be managed for those successional stages which would best

meet the objective of this proposed plan. The vegetation type acreages by zone are listed in Appendix 3. The implementation of grazing systems, construction of range improvements, initial stocking rates, and future adjustments of livestock and wild horse numbers, if necessary, will result in the anticipated levels identified in Appendix 4. This Appendix was reviewed by University of Nevada (Reno) range scientists for technical accuracy. This information has been displayed in a slightly different format than appeared in the DRMP/EIS to improve the usability of the Appendix.

Long-Term Actions (5 to 20 years)

1. In the long-term, the range monitoring program would provide data on which to base additional future adjustments in livestock and wild horse grazing and to determine additional improvements.

2. The allotment categories of maintain, improve, and custodial would be evaluated periodically. These evaluations would assure the management objectives are being reached and that range improvements would be initiated for those allotments with the greatest potential for improvement in resource conditions and return on investment.

3. Providing forage for reasonable numbers of big game would be a long-term objective. It is anticipated that additional habitat management plans will be prepared and implemented in the long-term.

REALTY MANAGEMENT

1. Lands which would be disposed of are those lands whose disposal would provide for more effective management of the public lands in the resource area. These lands are not in big game or upland game habitat or in wild horse herd management areas. This would amount to disposal of up to 39,555 acres. All land disposal would be done in a planned and orderly manner. Other lands may be appropriately applied for at a later date under one of several methods, including Recreation and Public Purposes applications, direct sales, exchanges, and Desert Land Entry Applications.

A breakdown by management zone is as follows:

- a. Zone 1 - dispose of up to 3,840 acres;
- b. Zone 2 - dispose of up to 4,721 acres;
- c. Zone 3 - dispose of up to 24,858 acres;
- d. Zone 4 - dispose of up to 160 acres;
- e. Zone 5 - dispose of up to 5,976 acres.

Land disposals will not adversely affect threatened or endangered species or their habitat, or reduce the likelihood of their recovery, nor will they lead to the loss, destruction, or degradation of wetlands or riparian areas, or lead to the modification, occupancy, or loss of the natural and beneficial functions of floodplains.

Refer to the Lands and Wilderness (Alternative B) Map at the end of Chapter 2 (DRMP/EIS) for the lands identified for potential transfer. It should be noted that, because of the small scale, these maps are for general location only and should not be considered completely accurate.

2. Two utility and transportation corridors are existing, one running north and south, and one running east and west. Two others would be planned, one running north and south and one running east and west. Refer to the Utility Corridors Map at the end of this chapter.

WILDERNESS STUDY AREAS

1. Portions of three wilderness study areas would be recommended as suitable for possible wilderness designation. Areas with the lowest wilderness quality were dropped. Important conflicts and manageability problems were excluded, but minor ones were excluded only in combination with other conflicts or problems, or apparent unnaturalness of an area. This would total 106,598 acres recommended for wilderness designation, including:

- a. Goshute Canyon (NV-040-015) 22,225 suitable acres (13,369 nonsuitable acres) - This would exclude foothill

areas possessing manageability problems, areas of high mineral potential, and areas with oil and gas potential.

b. Park Range (NV-040-154) 46,831 suitable acres (437 nonsuitable acres) - This would exclude an area which is a crested wheatgrass seeding;

c. Riordan's Well (NV-040-166) 37,542 suitable acres (19,460 nonsuitable acres) - This would exclude areas of mineralization, high potential for oil and gas, easy ORV access, and a northern portion which has less than high quality wilderness characteristics;

d. South Egan Range (NV-040-168) 0 suitable acres (96,916 nonsuitable acres) - This is excluded due to an intensity of cherrystemmed roads, crested wheatgrass seedings, easy off-road vehicle access, mineralized areas, and private inholdings. There would, however, be an 80 acre designated geologic area and a withdrawal from mineral entry within T. 10 N., R. 62 E., sec. 25, NE⁴NE⁴ and T. 10 N., R. 63 E., sec. 30 NW⁴NW⁴ (approximate-unsurveyed). The withdrawal would surround a recently discovered large limestone cave, high in the South Egan Range.

See the Lands and Wilderness (Preferred Alternative) Map at the end of chapter 2 (DRMP/EIS) for recommended wilderness areas.

2. Portions of two wilderness study areas would be designated as "limited" to off-road vehicles. This includes the northern part of the Riordan's Well WSA and the Central portion of the South Egan Range. Impacts resulting from ORV use are beginning to damage the wilderness character of these areas. The remainder of the resource area would be designated as "open" to ORV use. Refer to ORV Designation Map at the end of this chapter.

IMPLEMENTATION

INTRODUCTION

The resource management plan will be implemented through activity plans such as

allotment management plans, wildlife habitat management plans, and wild horse herd management area plans. These plans will identify such details as the grazing system to be used in an allotment management plan, the location of range improvements for the benefit of livestock, wild horses and wildlife. The management actions developed for these plans will be integrated into a total management program designed to assure progress towards meeting the objectives of the resource management plan. Additional implementation guidelines that apply to the proposed resource management plan are discussed below.

Implementation of the resource management plan will take place through coordination, consultation, and cooperation. Coordinated resource management and planning is an advisory process that brings together all interests concerned with the management of resources in a given local area (landowners, land management agencies, wildlife groups, wild horse groups, and conservation organizations) and is the recommended public process through which consultation and coordination will take place. Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies, consultation and coordination, inventory, or a combination of these sources.

WILDERNESS

All wilderness study areas will continue to be protected under the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review. Wilderness recommendations made in the proposed resource management plan are preliminary and subject to change during administrative review. A separate final legislative environmental impact statement will be prepared for the wilderness study recommendations. A wilderness study report will also be written that addresses each area individually. After review of these documents, the Director of the Bureau of Land Management would request mineral surveys by the United States Geological Survey and Bureau of Mines for each area recommended as preliminarily suitable. The Federal Land Policy and Management Act of 1976 requires the Secretary of the Interior to review areas of the public lands determined to have wilderness characteristics, and to report to the President by October 21, 1991 his recommen-

dations as to the suitability or nonsuitability of each such area for preservation as wilderness. The President is required to report his recommendations to Congress by October 21, 1993.

Areas designated as wilderness by Congress will be managed under the Bureau's Wilderness Management Policy. Areas designated as wilderness will be designated "closed" to off-road vehicles under the authority of executive order numbers 11644 and 11989 and the Wilderness Act of 1964 except if such use takes place as part of a valid existing right or if authorized in the wilderness management plan for the area.

REALTY MANAGEMENT

All land disposal actions proposed are discretionary. Actual disposal may be at the initiative of the Bureau or in response to expressions of interest from non-bureau individuals and entities. Proposed realty actions will be evaluated through the environmental analysis process to determine if the action is consistent with the objectives of the plan. The decision to dispose of a particular parcel will consider conflicts identified in required cultural resource and mineral reports and potential conflicts with other resources. Unsurveyed lands will be surveyed prior to disposal.

UTILITY CORRIDORS

Utility corridors which include existing transmission lines will be identified as existing corridors. Planning corridors will be identified where no transmission lines exist. Identification of corridors will follow bureau procedures and will be made on a point-to-point basis within specified valleys. The actual route will be established after environmental analysis is completed for the right-of-way. Each corridor will be 5 miles wide to provide opportunities for multiple transmission facilities and selection of routes that minimize environmental degradation in a cost-effective manner. Where utility lines are in existence, the width of the corridor will encompass existing rights-of-way and be located to avoid sensitive resources. Applicants for use of a corridor will be required to locate new facilities proximate to existing facilities except where

considerations of construction feasibility, cost, resource protection or safety are over-riding.

LIVESTOCK USE, WILD HORSE USE, AND WILDLIFE HABITAT MANAGEMENT

Wild Horses

The management of wild horses will be coordinated through wild horse herd management area plans. Wild horses will not be maintained outside of 1971 use areas. While it is recognized that some wild horses may drift outside these areas, management will be designed to minimize such drift.

Wildlife

The development of wildlife habitat improvement projects will be guided by wildlife habitat management plans. The development of plans will be closely coordinated with the implementation of allotment management plans to meet the objectives of both programs. Wildlife habitat management plans will address four major themes: management of crucial habitats to provide for threatened, endangered, or sensitive species where present; management of big game ranges to provide habitat for reasonable numbers of animals over the long term; improvement of riparian, wetland, and aquatic habitats; and management of other habitats to meet needs of upland game and nongame animals.

Riparian and aquatic habitat improvement measures could include managing livestock through grazing systems consistent with maintaining riparian vegetation in optimum condition, pasture fencing, or fencing areas to exclude livestock and wild horses. Whether to use protective fencing, grazing systems, some other appropriate measure, or a combination of methods will be determined on an individual basis for each stream or riparian area.

Livestock

Livestock grazing allotment management plans will include one or more of the grazing treatments described below. The grazing treatments will be designed to provide forage for consumptive use while maintaining proper and judicious use levels for key forage species. Appendix 5 lists the

existing and proposed allotment management plans in the Egan Resource Area. This gives the reader an idea of the basis of grazing systems. Additional AMPs will be developed, but there is not sufficient information to list these presently.

Grazing systems would include one or more of the following treatments in combination.

Treatment 1: Rest from livestock grazing for two consecutive growing seasons (approximately May 1 of one year to August 31 of the following year). Two growing seasons of rest would allow key management species to improve vigor and increase litter accumulation, seed production, and seeding establishment.

Treatment 2: Rest from livestock grazing for at least one year in both the spring (April 1 to May 30) and summer (June 1 to September 1) during each three or four year cycle.

Treatment 3: Graze each pasture at some time during each grazing year.

Treatment 4: Graze no pasture more than twice in the same growing season (spring or summer) during any three or four year cycle.

Treatment 5: Graze livestock to late fall only (approximately July 16 to November 15), and rest during the spring or summer the following year to improve the vigor, density, and reproduction of key grass species.

Treatment 6: Provide rest from livestock grazing for two years until seedlings are established or until it is determined that vegetation manipulation or recovery project is unsuccessful. This treatment provides the protection necessary for establishment or recovery of key management species following wildfire, prescribed burning, and seeding or spraying project.

Treatment 7: Defer livestock grazing from early spring to midsummer each year (approximately April 1 to June 30). Improved vigor and reproduction for key management species in each allotment would result.

Treatment 8: Allow grazing on winterfat/nuttall saltbrush up to 80 percent utilization during the dormant period (approx-

mately November 1 to March 1), and rest from grazing March 1 to October 31 each year.

Treatment 9: Provide for rest of key mule deer winter ranges during the flowering period of key forage species June 1 to July 30 each year.

Treatment 10: Provide for rest from grazing of antelope kidding grounds from May 1 to June 15 each year.

SELECTIVE MANAGEMENT

It is the policy of the Bureau of Land Management to address rangeland management problems through a selective management approach. The Bureau has developed three categories into which allotments will be grouped according to their resource needs and potential for improvement. The names and objectives of the three categories are: 1) maintain the current satisfactory condition; 2) improve the current unsatisfactory condition; and 3) manage in a custodial fashion. Appendix 6 lists each allotment and the final category designation.

SPECIFIC IMPLEMENTATION PROCEDURES

A rangeland program summary will be issued upon completion of the Resource Management Plan to inform livestock grazing permittees and interested publics about the implementation of the rangeland management program.

The Rangeland Program Summary explains the procedure involved in establishing initial and subsequent levels of livestock grazing use. Grazing decisions and agreements will be issued as part of the Rangeland Program Summary and will include either initial livestock grazing use levels or will identify the data needed and the procedures to be used in determining future adjustments.

Range management actions for livestock use and wild horse numbers will be based upon data obtained through the monitoring program and will consider recommendations made through the coordinated resource management and planning process. Actions could include, but will not be limited to, change in seasons-of-use, change in livestock numbers, correction of livestock distribution problems, alteration of the number of wild horses, development of range

Improvements, and taking site-specific measures to achieve improvements in wildlife habitat.

The Implementation strategy for the management actions identified in Table 2-1 related to livestock grazing allotments will be dependent on, and prioritized according to, the selective management category of the allotments.

EGAN RESOURCE MANAGEMENT PLAN

Table 2-1

PRIORITY OF IMPLEMENTATION ACTION BY ALLOTMENT CATEGORY

<u>Implementation Action</u>	<u>Category</u>	<u>Allotment Priority</u>
Fund rangeland	M	2
Improvements with appropriated funds	I C	1 3
Develop allotment management plans	M I C	2 1 3
Use supervision	M I C	3 1 2

MONITORING

A rangeland monitoring system was initiated in the Egan Resource Area during 1982. The purpose of the program is to provide management with reliable data to determine if livestock, wild horse, and wildlife management actions are meeting resource management objectives. It incorporates approved methods in the 1981 Range Studies Task Group monitoring procedures (Range Studies Task Group, 1981). The vegetation monitoring system being used includes:

Utilization: BLM uses the Key Forage Plant Method--an ocular estimate for judging utilization of key species by weight. In this method, the examiner divides noticeable utilization among six classes of use within a key management area; no-use (0 percent), slight (1-20 percent), light (21-40 percent), moderate (41-60 percent), heavy (61-80 percent), and severe (81-100 percent).

Actual Use: Livestock operators will provide records of actual livestock use. Use of the range by wild horses will be determined through census figures, with refinement made by season-of-use data as available. Actual use and season-of-use by big game animals will be determined in cooperation with the Nevada Department of Wildlife.

Climatic Data: Annual precipitation and length of growing season have a marked influence on seasonal vegetation growth and production. Official weather stations and Bureau of Land Management and Nevada State climatic stations will provide the climatic data. This data will be used to correlate seasonal weather to plant growth throughout the resource area as determined in the utilization and trend studies.

Trend: Trend is the direction of change in condition of the range observed over time. Changes in trend are categorized as upward, downward, or not apparent. From three to five years of observation are needed before any trend can be detected on most range sites. Trend is measured by using several methods, primarily by noting changes in the frequency of key species in key areas over time, using the Quadrat Frequency Method. Additional monitoring will be conducted in crucial wildlife and wild horse areas. Information gained through these efforts and other studies will be used in making any grazing decisions. For more detailed information on these monitoring procedures, refer to the 1981 Final Nevada Range Monitoring Procedures (Range Studies Task Group, 1981), the draft Bureau Monitoring Studies Manual (USDI, BLM) and the Nevada Wildlife Manual Supplement 6630 (USDI, BLM, Aug. 1982).

The monitoring program for those allotments in the "maintain" and "custodial" categories will be of low intensity. For the "improve" category allotments, monitoring intensity will be variable, focusing on the effects of management actions on range condition. The monitoring program will be an integral part of the resource management plan.

ESTIMATED COST OF IMPLEMENTATION

Costs of implementation are difficult to determine, given the fact that information on miles of fence, acres of seeding, etc., is somewhat conjectural at this point.

Nevertheless, the costs of implementing the rangeland management issue has been estimated, using the best information currently available. These costs are presented in Table 2-2.

EGAN RESOURCE MANAGEMENT PLAN

Table 2-2

COST OF IMPLEMENTATION

<u>Item</u>	<u>Cost</u>
Livestock Range Improvements	\$ 494,225
Wildlife Habitat Improvements	60,000
Watershed Improvements Riparian Rehabilitation	30,000
Wild Horse Improvements	30,000
Total	\$ 614,225

The costs for this table apply to the Rangeland Management Issue only. Does not include BLM overhead costs for environmental assessment preparation, contract preparation and supervision, etc.

STANDARD OPERATING PROCEDURES

Certain requirements are inherent in the implementation of any Federal action on the public lands. These requirements, or Standard Operating Procedures, are designated to mitigate impacts stemming from management objectives or the construction of support facilities necessary to implement any Federal Act.

The following will be applied to any action resulting from the planning system. These requirements will be part of the standard analysis process.

1. Environmental assessment will be conducted before project development so that, depending on impact, modification or abandonment of the proposed project may be considered.

2. Compliance with wilderness directives on proposed projects will be in accordance with Section 603 (a) of the Federal Land Policy and Management Act (1976), which provides that until Congress acts on Wilderness Study Areas or on lands still under wilderness review, the following policy shall prevail: Existing multiple-use activities, including grazing, will continue, but new or expanded existing uses will be allowed only if the impacts would not impair the area's suitability for designation as wilderness. Proposed uses and projects will be analyzed on a case-by-case basis to assure compliance with the Interim Management Policy and Guidelines for Lands Under Wilderness Review. After designation the areas will be managed in accordance with the wilderness management plan developed for each area and with the Wilderness Management Policy.

3. Threatened or endangered plant or animal species clearance is required before implementation of any project. Consultation with the Fish and Wildlife Service per Section 7 of the Endangered Species Act is necessary if a threatened or endangered species or their habitat may be impacted. If there is deemed to be an adverse impact, either special design relocation or abandonment of the project will follow.

4. Cultural resource protection requires compliance with Section 106 of the National Historic Preservation Act of 1966, Section 2(b) of Executive Order 11593, and Section 101(b)(4) of the National Environmental Policy Act (NEPA) of 1969. Prior to project approval, intensive field (Class III) inventories will be conducted in specific areas that would be impacted by implementing activities. If cultural or paleontological sites are found, every effort will be made to avoid impacts. However, where that is not possible, BLM will consult with the State Historic Preservation Officer and the Advisory Council on Historic Preservation, in accordance with the Programmatic Memorandum of Agreement by and between the BLM and the Council dated January 14, 1980. This agreement sets forth a procedure for developing appropriate mitigative measures to lessen the impact of adverse effects.

5. Visual resource management requires all actions to be in compliance with BLM Visual Resource Management Design Procedures in BLM Manual 8400. On any project which has a

visual contrast rating that exceeds the recommended maximum for the visual class zone in which it is proposed, the visual contrasts will be considered significant and mitigating measures must be examined. The ultimate decision as to whether mitigating measures must be implemented or not rests with the District Manager and will be made on a project-by-project basis.

6. Areas of critical environmental concern will receive priority designation and protection during the land use planning process per Sections 201 and 202 of the Federal Land Policy and Management Act.

7. Deferral of livestock use will be in effect for a minimum of two growing seasons following vegetation conversion projects so vegetation may be reestablished. This may require a temporary nonuse agreement with the rancher involved to suspend part of the use in the allotment until the vegetation can be properly managed for grazing.

8. Only the minimal clearing of vegetation will be allowed on project sites requiring excavation.

9. Vegetation conversion that would alter the potential natural plant composition will not be allowed in riparian areas now or in the future.

10. Alteration of sagebrush areas either through application of herbicides, prescribed burning, or by mechanical means will be in accordance with procedures specified in the Memorandum of Understanding between the Nevada Department of Wildlife and Bureau of Land Management relating to the Western States Sage Grouse Guidelines.

11. Active raptor nests adjacent to areas proposed for vegetation conversion will be protected. On-the-ground work will be confined to the period preceding nesting activity or after the young have fledged (left the nest). Areas containing suitable nesting habitat will be inventoried for active raptor nests prior to initiation of any project.

12. Soils inventories will be completed prior to planning vegetation conversions to determine land treatment feasibility.

13. Fire management plans will be developed before any prescribed burning occurs on any native vegetation.

14. Project area cleanup will be accomplished by removing all refuse to a sanitary landfill.

15. Fence construction must comply with BLM Manual 1737. Lay-down fences will be constructed in wildlife and wild horse areas if necessary and feasible. Fences in wild horse areas will contrast enough with surroundings so as to be visible to horses and will have gates installed at least once every mile and at all corners. Fences in wild horse herd use areas will be located to minimize interference with the normal distribution and movement of wild horses. Selected portions of new fences constructed in these areas will be flagged or otherwise marked for one year after construction to make them more visible to horses.

16. Some spring developments may be fenced to prevent overgrazing and trampling of adjacent vegetation and provide escape areas for small wildlife. Water at these spring developments will be maintained at the source.

17. Physiological requirements for the management of different vegetation types will be determined by BLM based on the best available scientific information. Methods of management to meet these requirements will be determined through consultation with and recommendations from the Coordinated Resource Management and Planning (CRMP) Committee.

18. Water for wildlife and wild horses is to be made available in allotments and rested pastures, whenever feasible.

19. All past and future livestock water improvement sites will have wildlife escape devices (bird ramps) in watering troughs, lateral watering sites off pipelines, and the overflow piped away from the last trough so as to provide water at ground level for wildlife.

20. When required, excess wild horses will be removed from public lands and put in custody of individuals, organizations, or other government agencies. Field destruc-

tion of wild horses or burros, including cases of sick or lame animals, will be made only with appropriate authorization,

21. Water availability will be ascertained by well site investigation before water well development. The investigation will involve a detailed hydrogeological study of the site to determine groundwater availability.

22. Vegetative conversions that require herbicides will be accomplished in accordance with Washington Office Instruction Memorandum 81-135 and Department Manual 517 with regards to safety and application.

23. Applications for commercial or competitive special recreation permits will be analyzed through the environmental assessment process to determine what impacts may occur. These potential impacts will then be weighed against resource values to determine whether or not the special recreation permits will be authorized.

24. Time of day and/or time of year restrictions will be utilized in those areas where construction activities associated with transmission and utility facilities are in the immediate vicinity or would cross sage grouse strutting nesting and wintering grounds; critical mule deer and pronghorn antelope winter range; or antelope kidding areas. The restrictions are listed below.

Restrictions -

- a. Sage grouse strutting grounds: From March 1 to May 15 -- 2 hours before dawn until 10 a.m.
- b. Sage grouse nesting grounds: Late May to mid-June.
- c. Sage grouse wintering grounds: November 1 to March 31.
- d. Critical mule deer and antelope winter range: November 1 to March 31.
- e. Critical pronghorn antelope kidding areas: May 1 to June 30.

25. The Wilderness Study Areas contain 236,860 acres, of which 97,316 acres (41%)

are outside of the resource area. For purposes of analysis, impacts to resources are being analyzed according to the total Egan Wilderness Study Area acreage in relation to the total Egan Resource Area acreage.

26. Pending the development of a management plan for the 34,560 acre Sunshine Locality National Register District (Federal Register, March 7, 1978), any project which may affect the Sunshine Locality will be subject to the review and consultation procedures authorized in Section 106 of the National Historic Preservation Act of 1966 and as required in the Code of Federal Regulations (36 CFR 800).

27. No surface disturbance is to take place within the 1/2 mile buffer zone on either side of the Pony Express Route. The only exceptions allowed will be for the exploration of oil, gas, and geothermal and for the exploration and development of locatable mineral resources under the 1872 Mining law. Specific stipulations for minimizing adverse visual and physical effects including rehabilitation will be required. These stipulations will be developed through the environmental review process for each action.

28. Prior to the approval of a project which may harm or destroy any Native American religious or cultural sites the affected Native American tribes or organizations will be contacted for their input as required by the American Indian Religious Freedom Act of 1978.

29. Environmental analyses, including categorical exclusions, will be conducted prior to implementing any management-level plans (AMPs, HMPs, WHMPs, etc.) or carrying out any specific projects (fences, spring developments, seedings, etc.).

30. Precede any vegetation conversion in pinyon-juniper areas with commercial firewood and post sales. Any material not sold would be available for free use by individuals up until the conversion.

31. All lands not specifically designated closed or limited to off-road vehicles will be designated open to such use. This action is mandated by Executive Orders 11644 and

11989 and will be carried out in conformance with regulations published in 43 CFR 8340, and with BLM Manual Sections 8340, 8341 and 8342.

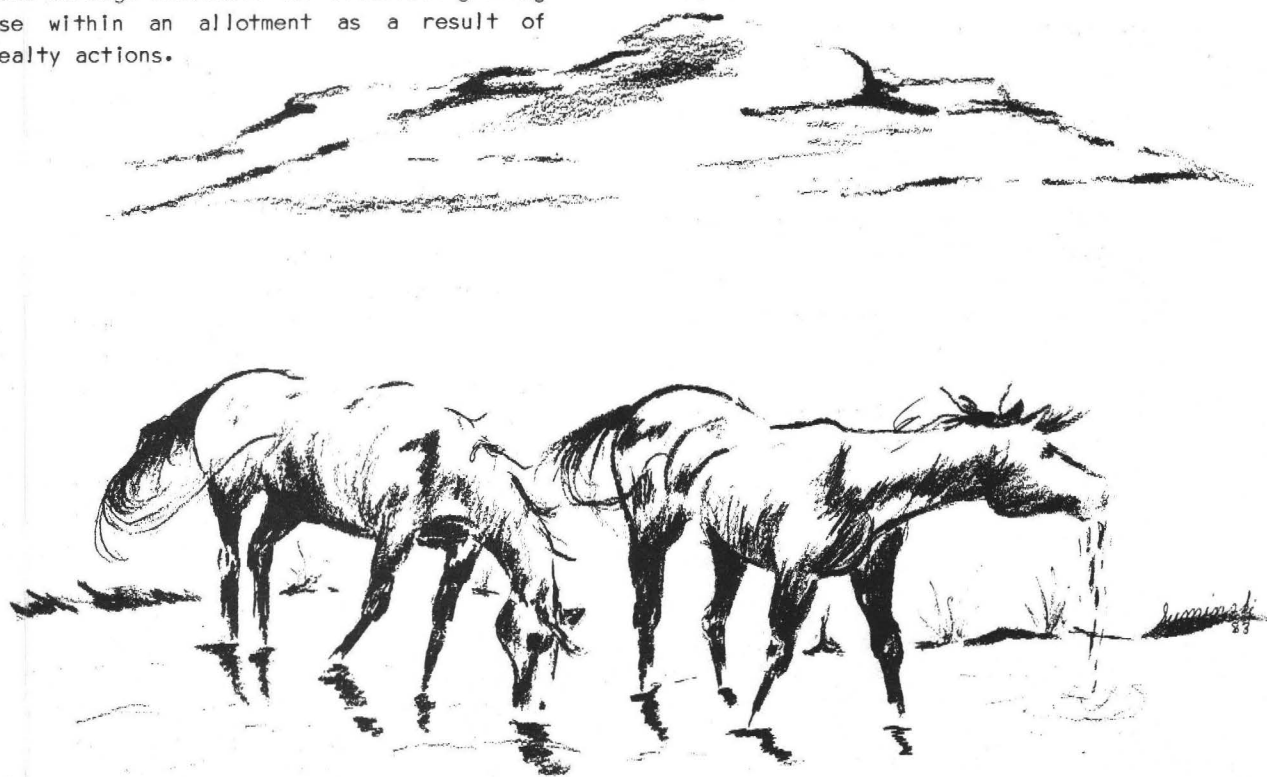
32. Any future land disposals would consider ownership patterns to eliminate the possibility of splitting allotments or use areas of livestock and wild horses, so the animals are able to move freely from one use area to another.

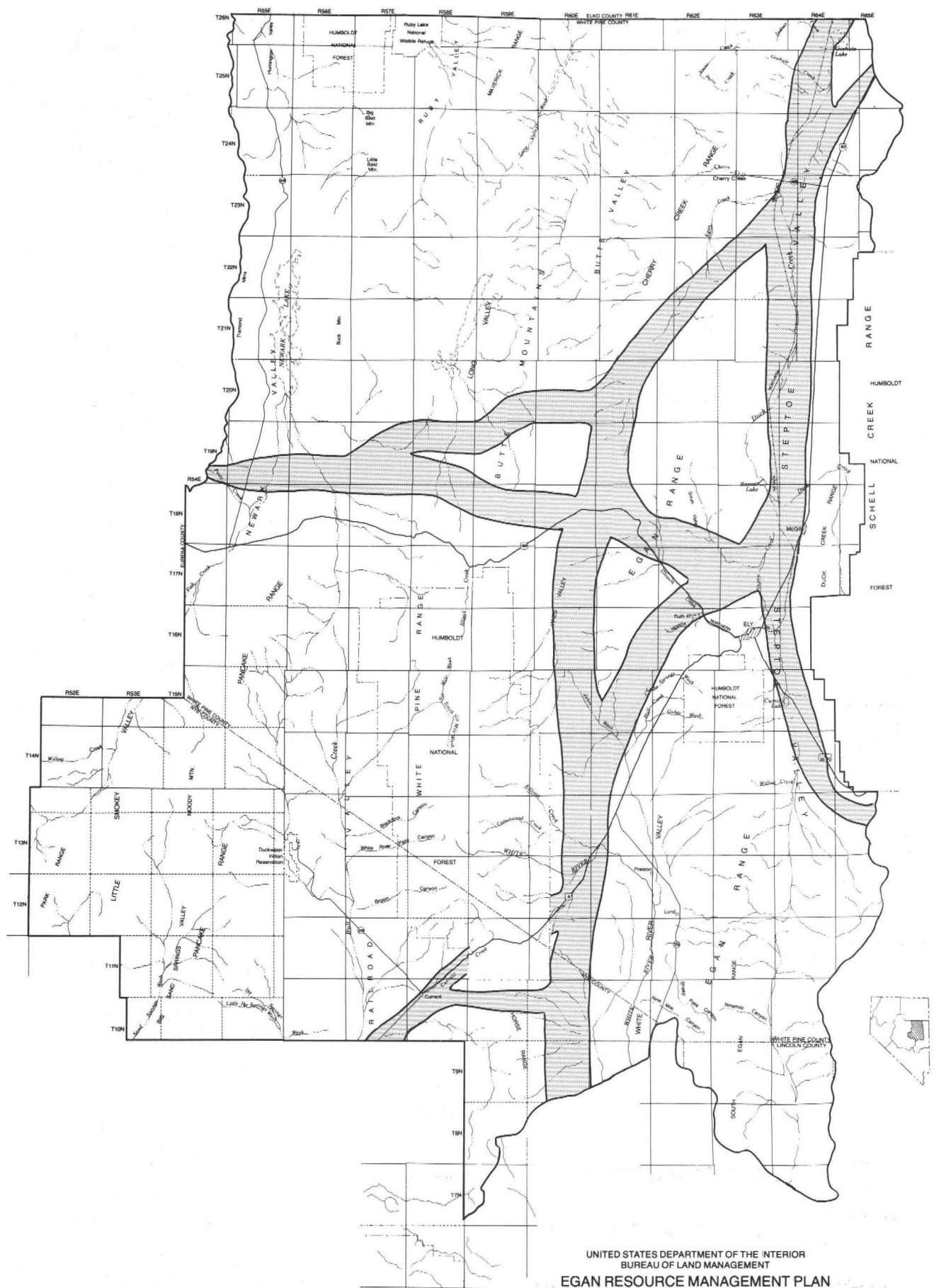
33. All woodland product harvest permits and contracts will include a stipulation to prohibit the cutting of rare or unique trees and vegetation. In particular, cutting of aspen, limber pine and bristlecone pine will be prohibited.

34. Rights-of-way for public access will be reserved prior to disposal of lands.

35. None of the lands identified as suitable for disposal will be transferred to other ownership if the cultural resources survey shows that they contain sites determined to be eligible for inclusion in the National Register of Historic Places (USDI, NPS, 1979).

36. Livestock permits will be adjusted, if necessary, to reflect decreases in public land acreage available for livestock grazing use within an allotment as a result of realty actions.

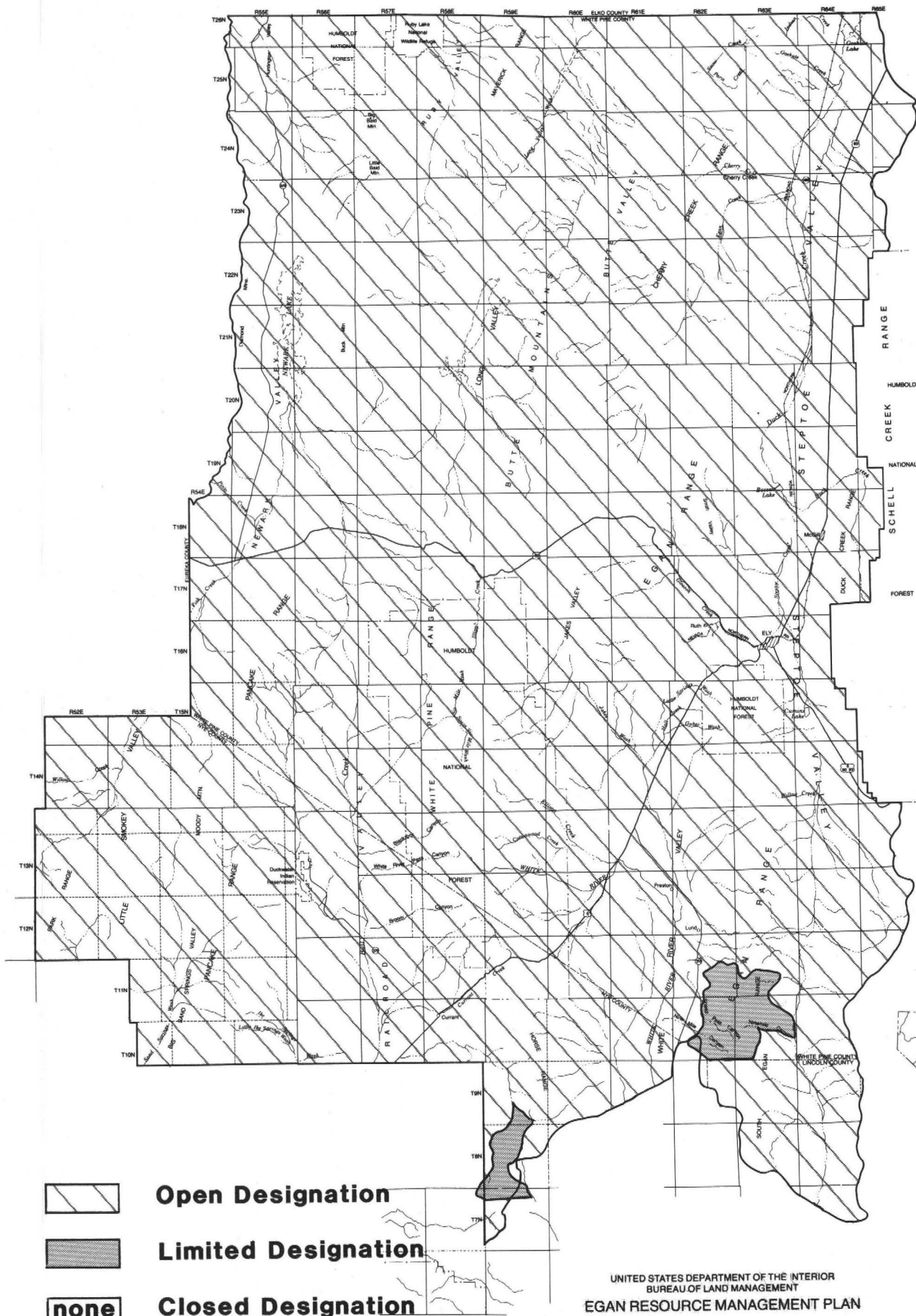




UNITED STATES DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 EGAN RESOURCE MANAGEMENT PLAN

 **CORRIDORS**

PROPOSED UTILITY CORRIDORS



UNITED STATES DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 EGAN RESOURCE MANAGEMENT PLAN

ORV DESIGNATION

1984

Revisions and Errata

DEIS page 20 first column, first paragraph. Revise the last sentence to "Professional judgement and preliminary data from monitoring studies indicate that forage demand may greatly exceed current forage production in some areas and, in certain areas, there is competition between wild horses, livestock, and wildlife for available forage."

DEIS page 20 first column, third paragraph. Revise the last sentence to "Professional judgement and preliminary data from monitoring studies indicate that forage demand may greatly exceed current forage production in some portions of this zone."

DEIS page 20 second column, first paragraph. Revise the last sentence to "Professional judgement indicates that total forage demand may be somewhat greater than current forage production in certain areas of this zone."

DEIS page 20 second column, third paragraph. Revise the last sentence to "Professional judgement indicates that total forage demand may be slightly greater than current forage production in certain portions of the zone."

DEIS page 20 second column, fifth paragraph. Revise the last sentence to "Professional judgement indicates that there may be limited competition between wild horses, livestock, and wildlife in certain portions of this zone."

DEIS page 35, first column, last paragraph. Revise to include at the end of this paragraph. "In order to help meet the objective of this alternative, horse numbers lower than those in Alternative B have been proposed for analysis purposes."



CHAPTER 3

Affected Environment

CHAPTER 3

Affected Environment

WILDLIFE

There has been a great deal of misunderstanding about stream condition as opposed to riparian condition. The two are not synonymous. A stream is a body of running water, either intermittent or perennial, that runs on the earth. Riparian pertains to an area of vegetation adjacent to or situated near a body of water or mesic (moisture) site.

Bureau of Land Management Manual 6671 gives direction as how to evaluate stream habitat condition for fisheries, and only fisheries. Several parameters are involved in collecting data for a stream rating. For the stream rating summary to determine fisheries habitat condition only the following parameters are included; percent of total stream in pools, pool to riffle ratios, percent of optimum, pool quality; percent of optimum, percent of stream bottom in desirable materials, stream bank cover, percent of optimum; and bank stability, percent of optimum. All these parameters are evaluated to determine the percent of stream habitat in optimum condition. The Ely District staff also takes benthos measurements and species as well as water quality.

Fisheries habitat, stream habitat conditions for fisheries may or may not be dependent on the adjacent riparian zone. An example of stream habitat as opposed to riparian rating is depicted in the following example.

Goshute Creek is located some 70 miles north of Ely, Nevada in the Cherry Creek Mountain Range. Goshute Creek lies in a steep canyon with a relatively steep watershed feeding the stream. The geology of the area lends the stream and surrounding area subject to frequent spring flooding during periods of unusually warm weather. The stream, itself,

has been scoured out on several occasions and deep gulleys have resulted in the stream channel because of the highly erodible soils. The stream is in fair to poor habitat condition for fish. However, the adjacent riparian vegetation on both sides of the creek is in good to excellent condition.

Please refer to Appendix 7 for a detailed listing of streams and the fisheries habitat condition for each.

MINERALS AND ENERGY

The Egan Resource Area is entirely within the Basin and Range physiographic province. Most of the mountain ranges trend north-south and are relatively narrow compared to the valleys. The mountain ranges of the area are mainly folded and faulted blocks of sedimentary, metamorphic, and igneous rocks. The present topographic relief is largely the result of movement along many north-trending faults.

Locatable Minerals

The easily discoverable high grade ore deposits have already been extracted or are now being mined. The industry has resorted to the mining of increasingly lower average grade ore deposits. The discovery and definition of new deposits and new mining districts is a future possibility. These two factors and their eventual mineral yields will depend upon 1) the evolution of technology, 2) the socio-economic demand for these minerals, and 3) the availability of lands open to prospecting and mining.

About 90 percent of the locatable mineral deposits in the Egan Resource Area are in contact metamorphic zones, or within or in proximity to granitic intrusive rocks, such

as Late Mesozoic and Early Tertiary Granodiorite and Quartz Monzonite. Such rocks also contain the porphyry copper deposits, and other essential minerals.

Approximately 10,000 mining claims are currently staked in the Egan Resource Area, with few exceptions these are located within the mountainous areas. There are about six active mines in the Resource Area, four of which are large operations employing over 50 people.

With the exception of about 7,200 acres the remainder (3,835,000 acres) of the Egan Resource Area is open to mineral entry.

Mineral exploration is concentrated in the bench and mountainous areas. Impacts from road building, core drilling, and other earth disturbances result from the more intensive exploration efforts. These impacts vary in duration, but are generally more long-lasting than those of oil and gas exploration and development. In fiscal year 1983, about 100 acres were disturbed by mining operations filed under 3809 regulations.

Oil and Gas

The geologic environment of the Egan Resource Area is very complex and little information on oil and gas traps has been revealed. Due to the extensive faulting in the area, the possibility of structural traps is immense. Based upon other geomorphic occurrences of producing oil fields in Nevada, the consensus of opinion is that the valleys are probably the most likely targets for oil and gas reservoirs. Geophysical exploratory operations and oil and gas leasing supports this opinion.

The majority of the Egan Resource Area lies within the trend of the overthrust belt, and oil or gas discoveries are possible in the future.

Oil and gas are known to occur in commercial quantities adjacent to the Egan Resource Area in the graben and downfolded area of Railroad Valley, particularly in the Eagle Springs and Trap Springs oil fields. These two fields are located within 7 miles of each other and about 53 miles southwest of Ely, outside the Egan Resource Area. Reservoir rocks in these fields are fractured

oligocene tuff and Paleocene carbonate rocks of the Sheep Pass Formation. Chainman Shale is considered to be the main source rock. Latest studies show that the lake beds of the Paleocene Sheep Pass Formation are also important source rocks which contain hydrocarbons.

Confirmation of both Chainman Shale and Sheep Pass Formations as probable petroleum source rocks greatly increases the range of geological environments which can be considered favorable for oil occurrence in the Egan Resource Area. There are no known occurrences of carbonaceous shales of the Elko Formation type, with the potential for production of oil shale derived hydrocarbons.

In the search for energy many miles of seismic line have been run across open country. In fiscal year 1983, 5,400 acres were disturbed by seismic activity. Most of the impacts occur in valleys and bench areas, and consist primarily of vegetative disturbances which can last from less than 5 years to more than 100 years, depending upon a number of factors.

An average of five to six applications to drill (APD) are filed each year in the Resource Area. None were filed in 1983 but it is expected that 15 will be filed in 1984. The number of APDs filed seems to depend, at least partially, on the state of the economy. As the demand for oil continues to increase, seismic exploration and drilling of wildcat wells will continue to increase.

There have been 48 wells drilled in the Egan Resource Area. Twelve of these have been drilled since 1979. To date only one of these wells is considered capable of producing commercial quantities of oil. This well is Northwest Exploration's "Carrant No. 1." The crude produced from this well is extremely viscous and produces from formation pressure only at this time. Northwest is considering several methods to enhance production from this well but this is still in the planning stages.

A good portion of the other wells drilled within the Egan Resource Area have had oil shows but have not been capable of producing in commercial quantities.

The lands in the Egan Resource Area are classified as follows according to availability for leasing and development:

Open to leasing with standard, nonrestrictive stipulation	2,060,556 acs.
Open with seasonal closures or other mildly restrictive stipulations	1,464,960 acs.
Open with highly restrictive or no-surface-occupancy stipulations (Wilderness stipulations)	264,960 acs.
Closed to leasing	51,840 acs.

The WSA lands fall within several of the above categories. All leases issued after October 21, 1976 are subject to a wilderness stipulation which restrict certain activities. Since then there has been a ban on oil and gas leases within WSAs. As leases expire within these areas they are not currently released under this moratorium.

Only those acres in the WSAs which actually fall within the Egan Resource Area are included in the above list.

Geothermal

Geothermal potential appears to be low throughout most of the Egan Resource Area with the exception of the area near Monte Neva Hot Springs. Hunt Energy has drilled two wells within this area, but neither well has proven to be productive as a geothermal steam source. One well was hot enough to produce steam but not in a great enough volume. The other well has plenty of hot water but not at a high enough temperature to produce geothermal steam.

The area has been dropped as a Known Geothermal Resource Area (KGRA) but the area still has a good potential as a geothermal resource for purposes other than the generation of electrical energy.

WATER RESOURCES

Surface and Ground Water

Surface water within the Egan Resource Area is limited because of high infiltration and evapotranspiration on valley slopes and evaporation from valley floors. Catchment reservoirs and guzzlers, designed to hold runoff from snowmelt and spring and summer thunderstorms, provide some surface water during certain times of the year. As result of surface water inventory efforts, approximately 700 springs and 39 perennial streams have been identified in the Egan Resource Area, along with numerous intermittent streams flowing only during wetter times of the year. Even the perennial streams which flow yearlong fluctuate in amount and distance of flow.

Groundwater resources are considered substantial in some of the major valleys in the Egan Resource Area. Most of the valleys are closed basins without external drainage. Approximately 115 wells for stock water and numerous private irrigation wells tap the aquifers located some 50 to 500 feet below the valley floors.

The habitat condition of springs and streams in relation to fisheries management was discussed under the riparian habitat section in the draft document.

Water Quantity

Surface water in the form of springs and streams occurs most frequently in or near mountainous areas. The discharge of streams is small, from about 4 to 5 cubic feet per second in the spring to less than 1 cfs in the fall and winter. Average flow of springs is considerably less. Catchment reservoirs and guzzlers provide approximately 100-200 acre-feet of surface water in the Egan Resource Area annually.

Groundwater storage is estimated to total nearly 15,000,000 acre-feet. Annual groundwater recharge is estimated at 150,000 acre-feet. Runoff from the mountainous areas is approximately 130,000 acre-feet annually (State of Nevada, Division of Water Resources, 1971). The ground water recharge in most valleys has not been totally appro-

riated. However, in Steptoe Valley all unappropriated groundwater is under application. One of these applicants, the White Pine Power Project, has applied for 23,000 acre-feet per year in Steptoe Valley and 12,000 acre feet per year in Butte Valley.

Water Quality

In 1980 the water quality of 50 springs and 13 streams was sampled in the Egan Resource Area by BLM. Some of these waters were sampled again in 1982. A BLM stream habitat inventory conducted in 1980-81 provides a limited amount of additional water quality data. In general, the quality of most waters in the area is good. Specific water quality data showed that 8 percent of the springs sampled exceeded 500 mg/l total dissolved solids (TDS) which is the suggested maximum for human consumption, and irrigation. This is primarily a result of the movement of water through mineral-rich alluvial slopes. The survey also showed that none of the streams sampled had TDS levels in excess of 500 mg/l. Average turbidity levels of 10 percent of the springs and streams sampled exceeded 10 turbidity units. The Nevada water quality regulation standard for fecal coliform bacteria was exceeded in 25 percent of those waters sampled.

SOILS

A "Third Order" survey has been completed for 33 percent of the Egan Resource Area. The survey of the entire resource area is scheduled to be completed in 1987. Range site interpretations have been developed for all areas surveyed to date and will be developed for all other areas as the survey is completed. Range site information is important for determining potential of an area to respond to grazing treatments or vegetative manipulation. The physical and chemical properties of different soils are useful in determining feasibility of certain range improvement or erosion control projects.

Because erosion susceptibility information is not available for the Egan Resource Area, erosion condition classes were identified by their respective Soil Surface Factors (SSF).

These factors are statistical ratings of ground cover and evidence of erosion. The SSF ratings and corresponding erosion condition classes are as follows:

0-20 stable, 21-40 slight, 41-60 moderate, 61-80 critical, and 81-100 severe. Nearly 58 percent of the Egan Resource Area is stable or exhibits slight erosion, 40 percent of the area has moderate erosion, slightly over 2 percent has critical erosion, and there are no areas of severe erosion.

CULTURAL RESOURCES

An estimated 1,860 cultural resource sites have been identified within the Egan Resource Area. Covering a timespan of over 12,000 years, these prehistoric and historic sites represent continuous use of the area, and include several substantial finds of the Paleo-Indian tradition, the earliest prehistoric peoples known in North America. More abundant, however, are sites related to the hunter-gatherers of the Desert Archaic tradition and the more recent Shoshone and Southern Paiute groups in the Protohistoric period. Sites associated with the horticulturally-based Fremont culture, who preceded the Shoshone, also occur in portions of the resource area. The various remains of these aboriginal cultures are classified into a variety of site types: open campsites, rock art, artifact scatters, quarries, rockshelters, isolated finds, and structural sites.

Historical use of the area began with early exploration efforts during the first half of the nineteenth century. Later, the establishment of overland mail routes, mining, agriculture, and livestock operations led to the growth and settlement of the area. Historic trails, mining buildings, homesteads, and cemeteries are the remnants of these developmental stages. A Class I literature overview has been completed for the Ely District (James, 1981). Additional Class I projects have focused on Ward-Willow (Johnston, 1983), Cherry Creek (Botti, 1978), and two wilderness study areas within the resource area (Nevada State Museum, 1979). Class II sample inventories have been carried out for the Cherry Creek vicinity (Botti,

1978), Park Range (Johnston and Zancanella, 1983, Pending), the White Pine Power Project (Zeier, 1981).

Approximately 3 percent of the resource area (123,300 acres) has been covered at the Class III Inventory level.

Based on existing site data, sensitive cultural resource areas include the following: Pony Express route, Elko-Hamilton-Stage Route, Northern Railroad Valley, The Sunshine Locality National Register District, and several historic mining districts. Additional sensitive areas may be established by further research or by the presence or absence of certain natural features; for example, pinyon-juniper vegetation, springs, former lake shores and terraces, and sand dune zones which are more likely to have associated cultural resources.

Four "National Register of Historic Places" properties have been identified within the area.

The Sunshine National Register District is the site of substantial, undisturbed deposits representing the 7- 10,000-year-old Western Pluvial Lakes Tradition.

Ward Charcoal Ovens Site, composed of six 30-ft.-high stone ore roasting ovens dating from 1876, is presently administered by the State of Nevada.

The site of Schellbourne has been a Shoshone Indian village, Overland Stage and Mail stop, Pony Express Station, a location on the route of the Overland Telegraph, base of military operations, mining camp, and a location on the Lincoln Transcontinental highway.

The old town of Schellbourne included several stores, blacksmith shops, livery stables, a boarding house, post office and a newspaper. A portion of these buildings remain and are utilized by a private ranching operation. The majority of the site is privately owned.

Ruby is a privately owned site established in 1862 as a station on the Pony Express and Central Overland Stageline; Ft.

Ruby served as a fort during the Civil War. The landmark incorporates two single-story log buildings originally used as a post office and residence. Fort Ruby structures have been transported to a public museum in Elko.

OFF-ROAD VEHICLES

Currently there are no ORV designations in effect for the Egan Resource Area, and the area has been essentially managed as "open" to ORV use. Organized off-road vehicle events (competitive or noncompetitive) are handled on a case-by-case basis through the Special Recreation Use Permit and the Environmental Review process. Emergency ORV closures (BLM Manual 8341.21) are required if it is determined that ORV use is causing considerable adverse effects on resources, and when there is insufficient time to complete Standard or Interim Designation.

Actual cross-country travel is observed fairly infrequently in most of the resource area. The use generally occurs on existing roads and jeep trails. In addition, these existing roads provide access to many backcountry areas and the roads and trails provide a variety of challenge sought by many enthusiasts. Off-road vehicle operation is generally performed in conjunction with some other activity, except around population centers. Activities that often involve off-road use include hunting, trapping, woodcutting, pine nut collection and livestock control.

ORV use associated with unpermitted woodcutting is beginning to damage the wilderness character of the Riordan's Well WSA. Casual road extension in the South Egan Range WSA is also beginning to damage the wilderness character.

Revisions and Errata

DEIS page 57 VEGETATION, second paragraph. Revise "Chapter 2" to "Chapter 3."

DEIS page 60 WILDLIFE, first paragraph. Revise "See Appendix 8 for condition rating system used to determine stream riparian condition" to "See Appendix 8 for condition rating system used to determine fisheries habitat conditon."

DEIS page 62 first column, second paragraph. Revise the first sentence to "The potential exists for augumentation of existing populations in White River, Butte, Long, and Newark Valleys."

DEIS page 63 AQUATICS, second sentence. Revise "Appendix 8" to "Appendix 7."



CHAPTER 4

Environmental Consequences

CHAPTER 4

Environmental Consequences

WATER RESOURCES

In the short-term soil erosion and water quality would continue to be significantly impacted in those areas that are being over-grazed. In the long-term impacts to soil erosion and water quality would decrease because of the improvement to vegetation and the watershed as a whole.

CULTURAL RESOURCES

Due to incomplete cultural resources data for the Egan Resource Area, it is impossible to predict the exact numbers and types of cultural resource sites which might be impacted as a result of implementation of the proposed resource management plan.

Most potential adverse impacts to historic and prehistoric sites will be avoided through adherence to the standard operating procedures outlined in Chapter 2 and the conditions included in the Programmatic Memorandum of Agreement between the BLM and the Advisory Council on Historic Preservation.

Since most cultural resources sites are situated on or just below the ground surface, they are highly susceptible to many forms of impact.

Aside from vandalism (surface collection of artifacts, defacement, or unauthorized excavation) considerable destruction may occur as a result of grazing (Roney, 1977). Trampling by cattle, wild horses, and big game, as well as disturbances resulting from range improvement projects, cause potentially significant impacts to cultural resources. Overgrazing and reduction of vegetation can result in accelerated erosion and deterioration of cultural resource sites (Schell Grazing EIS, 1982).

The development of seedings, springs, pipelines, and fences where relocation is not possible could potentially directly impact cultural resources. But since these areas are site specific, the completion of the required cultural resource surveys and data recovery or salvage prior to construction would result in quantitative and qualitative increases in cultural resource information necessary for both management and scientific needs.

On the other hand, salvage of a cultural resource site also constitutes a significant adverse impact. Once excavated, a site is effectively destroyed and removed from future research considerations which may utilize different or new techniques of data recovery and analysis. A data gap in the history of an area could result as a consequence. Therefore, although salvage is a mitigation technique, it does not eliminate all of the adverse impacts.

The disposal of up to 39,555 acres of public land may result in increased impacts to cultural resources. Though each disposal action will be analyzed and potential impacts will be mitigated on a case-by-case basis, as outlined under standard operating procedures, irretrievable impacts to cultural resources may occur if excavation is necessary to salvage cultural resource information prior to disposal.

OFF-ROAD VEHICLES

Some adverse impacts would occur by designating most of the resource area as "open" to off-road vehicles (ORVs), as presently unroaded areas become roaded as a result of casual ORV use. Occasionally, users will "push" an existing road further into the backcountry or will diverge from it somewhere before it ends, creating branches

off the main route. It is used more and more often by other travelers and soon becomes a permanent feature.

Beneficial impacts to the wilderness character of the Riordan's Well and South Egan Range WSAs would occur as a result of designating portions of these areas as "limited" to existing roads and trails for ORV use. Casual road extension into these portions of the WSA would be prohibited.

Aside from this casual road extension, little damage is known to be occurring from the current levels of ORV use or from the current ORV use patterns, and impacts from this use are considered insignificant.

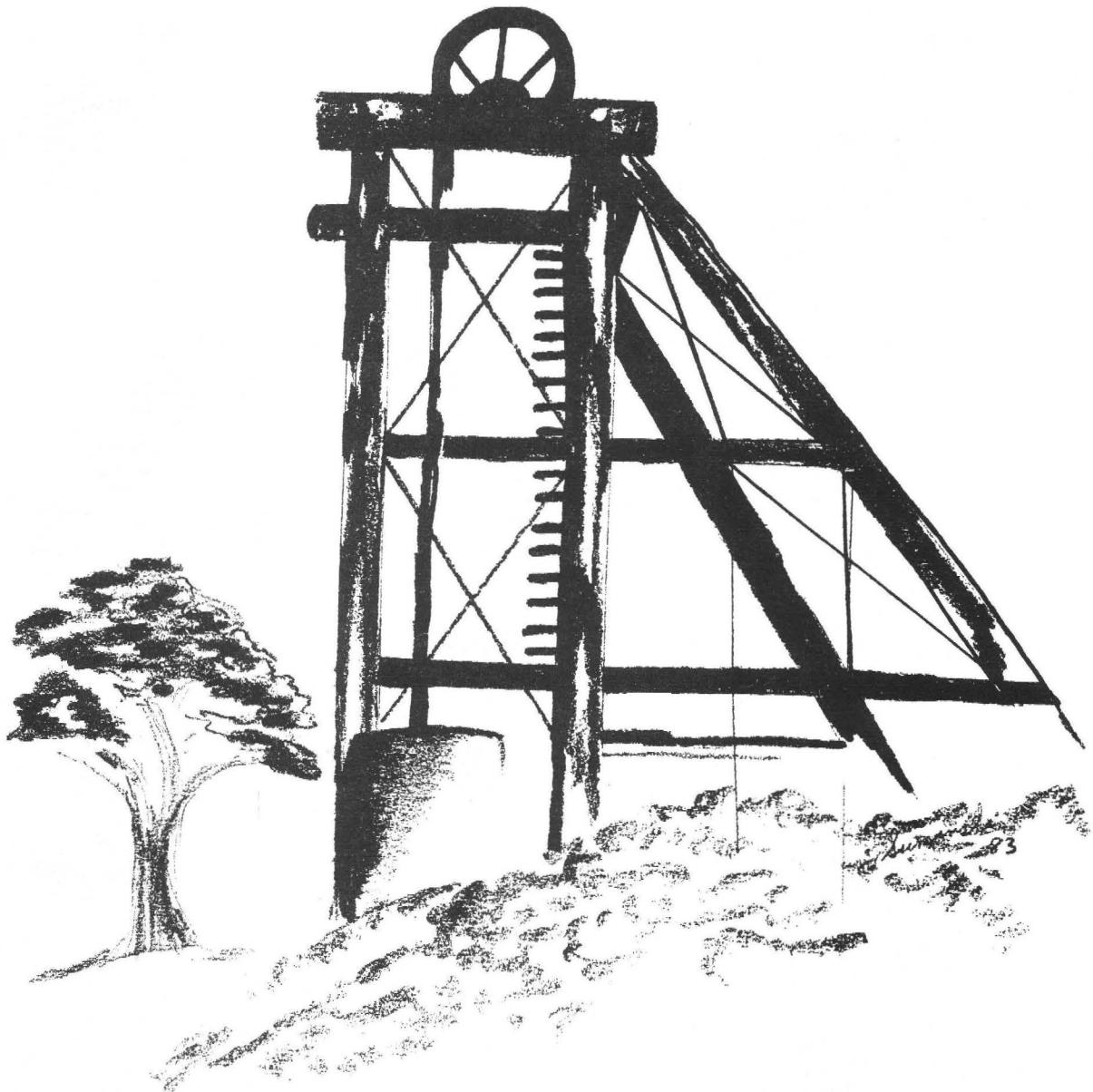
Please refer to Appendix 8 for a comparison between the proposed plan and preferred alternative of the long-term impacts.



Revisions and Errata

DEIS page 93 first column. Delete Assumption 20.

DEIS page 109 VEGETATION, first column, first paragraph. Add at the end of this paragraph "Although not discussed in the previously cited literature, wild horse use is currently year-long and adds greatly to use during the plant's critical growth period."



CHAPTER 5

List of Preparers

CHAPTER 5

List of Preparers

The list of persons who have been involved in the preparation of the Egan Resource Management Plan has been updated. The individuals marked with an asterisk were not included in the draft document.

*Mark Barber, Wildlife Biologist, B.S. Wildlife Management, Oregon State University. Twelve years experience. Responsible for developing the responses to the public's wildlife comments.

Berton Bresch, Sociologist, Masters Degree in Counseling, California State University at Sonoma. Five years experience. Responsible for social values and public attitudes analysis.

Hal Bybee, Wild Horse Specialist, B.S. Agricultural Range Management, University of Nevada at Reno. Seven years experience. Responsible for the wild horse sections.

Vearl Christiansen, Range Conservationist, B.S. Range Science, Brigham Young University. Six years experience. Responsible for the vegetation and range management portions.

Diane Colcord, Cartographer, B.S. Art Education, University of Oregon. Sixteen years experience. Responsible for cartography.

Benjamin Cope, Realty Technician, A.S. Associate of Science, Dixie College. Twenty-two years experience. Responsible for cartography.

William J. Lindsey, Range Conservationist, B.S. Range Resources, Oregon State University. Four years experience. Responsible for vegetation mapping.

Howard Hedrick, Egan Resource Area Manager, B.S. Range Resources, University of Idaho. Eight years experience. Responsible for directing the Egan Resource Management Planning Team.

*C. Wayne Howle, Wilderness Program Leader, B.A. Political Science, College of Charleston. Four years experience. Responsible for wilderness information.

*Sarah Johnston, Archaeologist, B.A. Anthropology, California State University at Sacramento. Seven years experience. Responsible for cultural resources and natural history sections.

*Mary Beth Marks, Geologist, B.S. Geology, Humboldt State University. Three years experience. Responsible for fluid mineral information.

*Cleone McDonald, Public Affairs Clerk, B.S. Education, Dickinson State College. Five years experience. Responsible for editing and typing.

Paul Myers, Regional Economist, B.S. Economics, University of Nevada at Reno. Eleven years experience. Responsible for economic analysis.

*Shaaron Netherton, Outdoor Recreation Planner, B.S. Wildlife Management, Humboldt State University. Six years experience. Responsible for wilderness and recreation sections.

Jerry R. O'Donnell, Clerk-Typist. One year experience. Responsible for typing.

Michael W. Ferkins, Wildlife Management Biologist, B.S. Wildlife Science, Fisheries Science, Utah State University. Eight years experience. Responsible for the wildlife and fisheries sections.

Jacob Rajala, Outdoor Recreation Planner, M.A. Anthropology, M.S. Forestry and Range Management, Washington State University. Five years experience. Responsible for the wilderness portion.

William D. Robison, Geologist, B.S. Geology, San Diego State University. Six years experience. Responsible for minerals and energy sections.

Stephen Rynas, District Planning Coordinator, B.A. History, University of Maryland at College Park. Four years experience. Responsible for quality control.

Ronald Sjogren, Realty Specialist, B.A. Geography, San Diego State University. Twenty years experience. Responsible for the realty management sections.

Rita R. Suminski, Wildlife Management Biologist, M.S. Fisheries Science, New Mexico State University. Responsible for art work. (Schell Resource Area, Ely BLM District.)

*Joyce Yelland, Clerk-Stenographer. Eight years experience. Responsible for typing and editing.

NEVADA STATE BLM OFFICE SPECIALIST REVIEW

Specialists in all fields from the Nevada State BLM Office have reviewed this document for technical accuracy and consistency with Federal law and BLM policy.



CHAPTER 6

PUBLIC COMMENTS

BLM RESPONSES

CHAPTER 6

Public Comments/BLM Responses

CONSULTATION AND COORDINATION

Preparation of the Egan Resource Management Plan was initiated in July 1981. To bring the public and other agencies into the Egan planning process, a mailing list has been developed to keep interested parties informed on the progress of the plan. Further, briefings, workshops, and newsletters have been prepared to encourage public contact and to solicit public input. At the end of this narrative is an abbreviated list of organizations that have been asked to contribute to this planning process.

On July 16, 1981 a "Notice of Intent" for the preparation of the Egan Resource Management Plan appeared in the Federal Register to formally "kick off" the beginning of the planning process. This initial phase involved developing the issues that the Egan Resource Management Plan would be addressing. To solicit public input the Ely District initiated a mass mailing to the people and organizations on the mailing list, issued press releases to the newspapers in Nevada and Utah; and presented briefings to the Nevada State Clearinghouse, Nevada Congressional delegations, local governments, Indian Tribes, Planning Commissions, and civic organizations. Of the six-hundred issue identification brochures which were distributed, just under one-hundred were returned. Basic issues which the public thought that the Egan Resource Management Plan should address were: grazing, wild horses, wilderness, and minerals.

In April 1982 the Issues and Planning Criteria for the Egan Resource Management Plan were released for public review. Just over ten comments were received from the public concerning this phase of the planning effort. The majority of the letters were

supportive of this document and contributed additional criteria for inclusion into the planning process.

In January 1983 the draft alternatives for the Egan Resource Management Plan were released for public review. This phase was preceded with a Federal Register notice, mass mailing, and press releases. Workshops were held in Ely (Feb. 15, 1983) and in Reno (Feb. 16, 1983). By the end of the public comment period just over twenty-five written comments were received. The majority of comments received were sent by the Nevada State Clearinghouse, ranching interests, mining interests, and conservation groups. Overall the respondents were in favor of alternatives which reduced wild horse populations, promoted economic development, and kept wilderness designation to a minimum. Briefings were offered to the Nevada Clearinghouse, the Nevada Congressional Delegations, and local governmental organizations, however, none was ever requested.

The Egan Draft Resource Management Plan and Environmental Impact Statement was mailed out to the persons on the Egan Resource Management Plan mailing list on September 9, 1983. The Federal Register notice announcing the filing of the draft plan and Environmental Impact Statement and its availability to the public appeared in the September 23, 1983 issue of the Federal Register. In addition, this notice stated that public hearings would be held in Ely and Reno, Nevada, and that the public review period for the draft document would end on December 24, 1983. News releases were also issued to announce the availability of the draft document. Approximately five hundred (500) copies of the draft's summary were mailed out. Approximately two hundred and seventy-five (275) copies of the actual draft were distributed.

A public hearing was held in Ely on October 25, 1983. Nine people attended the meeting and four of them made oral statements. A second hearing was held in Reno on October 26, 1983. It was attended by forty-two members of the public, twenty-one of whom made oral statements. The transcripts of these public meetings are available for inspection at the Ely District Office Bureau of Land Management.

In addition to the public hearings, briefings were offered to the State of Nevada Clearinghouse on November 8, 1983 and to the Nevada Congressional Delegations on November 7, 1983.

A total of seventy-four letters were received from the public on the draft plan and environmental impact statement. Comments from the Nevada State Clearinghouse were counted as one letter, but included letters from the Department of Transportation, Department of Agriculture, Department of Conservation and Cultural Resources, Division of State Lands, Nevada Department of Minerals, Bureau of Mines and Geology, Division of State Parks, Department of Environmental Protection, Division of Water Planning, and the Department of Wildlife.

The following list of organizations and persons is an abbreviated version of the Egan Resource Management Plan mailing list. These organizations and persons will be automatically receiving a copy of this document. Copies of this document may be requested by writing to the Ely District at the address found in the section titled Availability of the Proposed Egan Resource Management Plan.

I. State Governmental Agencies

- A. Governor Richard Bryan
- B. Nevada's Congressional Delegations
- C. District 35 Assemblyman, Virgil Getto
- D. State Senator, Richard Blakemore
- E. Nevada State Clearinghouse

II. Federal Agencies

- A. Nevada State BLM Office
- B. Adjacent BLM District Offices
- C. Bureau of Indian Affairs
- D. Environmental Protection Agency
- E. Fish and Wildlife Service
- F. Humboldt National Forest

- G. National Park Service
- H. Soil Conservation Service
- I. White Pine County Extension Agent
- J. Lincoln County Extension Agent
- K. Nye County Extension Agent
- L. Geologic Survey
- M. Bureau of Reclamation
- N. Bureau of Mines

III. Local Governmental Agencies

- A. White Pine County Commissioners
- B. Lincoln County Commissioners
- C. Nye County Commissioners
- D. Ely City Council
- E. White Pine County Regional Planning Commission
- F. Nye County Planning Commission
- G. Lincoln County Planning Commission
- H. Central Nevada Development Authority
- I. Preston/Lund Town Council
- J. McGill Town Council
- K. Ruth Town Council

IV. Public Libraries

- A. White Pine County Library
- B. Lincoln County Library
- C. Nevada State Library
- D. University of Nevada Library
- E. Nye County Library

V. BLM Advisory Councils

- A. White Pine County CRMP Committee
- B. Ely District Grazing Board
- C. Ely District Advisory Council
- D. Nevada State Grazing Board

VI. Indian Organizations

- A. Duckwater Tribal Council
- B. Ely Colony Council

VII. Conservation Groups

- A. American Horse Protection Association
- B. Animal Protection Institute
- C. National Wildlife Federation
- D. Natural Resources Defense Council
- E. The Nature Conservancy
- F. Nevada Archaeological Association
- G. Nevada Wildlife Federation
- H. Nevada Outdoor Recreation Association
- I. Sierra Club
- J. White Pine Sportsman's Club

- K. The Wilderness Society
- L. Wild Horse Organized Assistance
- M. The Wildlife Society

- H. Eureka Sentinel
- I. Millard County Chronicle
- J. Elko Daily Free Press
- K. Elko Independent

VIII. Grazing Interest

- A. Nevada Cattleman's Association
- B. Nevada Woolgrowers Association
- C. Society for Range Management
- D. Resource Concepts Incorporated
- E. Egan Resource Area Permittees
- F. National Cattleman's Association
- G. White Pine County Farm Bureau

IX. Mining Interests

- A. Amselco Minerals, Inc.
- B. Atlantic Richfield
- C. Chevron Resource Co.
- D. Exxon Minerals Co.
- E. Kennecott Minerals Co.
- F. Northeastern Nevada Miners and Prospectors Association
- G. Nevada Mining Association
- H. Silver King Mines
- I. Superior Oil Company
- J. Texaco Incorporated
- K. White Pine Minerals Corporation
- L. Boundy and Foreman
- M. Ely Valley Mines
- N. Bear Creek Mining Company
- O. Placer Amex

X. Electric Utilities

- A. Mt. Wheeler Power Company
- B. Sierra Pacific Power Company
- C. White Pine Power Project
- D. Nevada Power Company

XI. Miscellaneous Corporate Interests

- A. White Pine County Chamber of Commerce
- B. Pacific Legal Foundation
- C. Public Lands Institute
- D. Public Lands Council
- E. Renewable Resources Center
- F. Natural Resources Defense Council

XII. Newspapers

- A. Lincoln County Record
- B. Ely Daily Times
- C. KELY Radio
- D. Nevada State Journal
- E. Iron County Record
- F. Salt Lake Tribune
- G. Wells Progress

XIII. Periodicals

- A. Nevada Farm Bureau's Journal
- B. Habitat
- C. Toiyabe Trails
- D. Rangelands
- E. National Wildlife
- F. Rangeland News
- G. Great Basin Reporter

AVAILABILITY OF THE PROPOSED
EGAN RESOURCE MANAGEMENT PLAN

Persons whose names appear on the Egan Resource Management Plan mailing list will receive notification of the availability of this document. A statewide news release will also provide information for requesting personal copies of these publications.

Copies of the proposed plan will be available for review at the libraries and offices listed below. For further information contact Howard Hedrick, Egan Resource Area Manager, Ely District Office, Star Route 5, Box 1, Ely, Nevada 89301.

Bureau of Land Management Offices

Office of Public Affairs, BLM
18th and C Streets
Washington, D.C. 20240

Nevada State Office, BLM
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Battle Mountain District Office, BLM
North 2nd and South Scott Streets
Battle Mountain, Nevada 89820

Carson City District Office, BLM
1050 E. William Street
Carson City, Nevada 89701

Elko District Office, BLM
2002 Idaho Street
P.O. Box 831
Elko, Nevada 89801

Ely District Office, BLM
Star Route 5, Box 1
Ely, Nevada 89301

Las Vegas District Office, BLM
4765 West Vegas Drive
P.O. Box 26569
Las Vegas, Nevada 89126

Winnemucca District Office, BLM
705 East 4th Street
Winnemucca, Nevada 89445

Utah State Office, BLM
University Club Building
136 East South Temple
Salt Lake City, Utah 84111

Salt Lake District Office, BLM
2370 South 2300 West
Salt Lake City, Utah 84119

Cedar City District Office, BLM
1579 N. Main Street
P.O. Box 729
Cedar City, Utah 84720

Richfield District Office, BLM
150 E. 900 N.
P.O. Box 208
Richfield, Utah 84701

Fillmore Area, BLM
P.O. Box 778
Fillmore, Utah 84631

Nevada State Library
Library Building
Carson City, Nevada 89710

University of Nevada, Las Vegas
James R. Dickinson Library
4505 Maryland Parkway
Las Vegas, Nevada 89154

University of Nevada, Reno
Getchell Library
Reno, Nevada 89507

INTRODUCTION TO PUBLIC COMMENTS AND RESPONSES

All the written and oral comments on the draft were reviewed. Substantive comments which presented new data, questioned facts or analysis, or commented on issues directly affecting the draft, were fully evaluated and are responded to in this document.

All of the letters and oral testimony have been reprinted in this document. The responses to the written and oral comments are listed following all letters and comments. Each response is given a number which corresponds to numbered paragraphs or sections in the actual public comments. To find the BLM response to any particular paragraph or section, simply look for the large bold number directly to the left of the statement and then turn to the Response section and find the same number. Table 6-1 shows a list of respondents and their principle concerns as well as the numbers of the BLM responses.

Public Libraries

White Pine County Library
Campton Street
Ely, Nevada 89301

Lincoln County Library
Caliente, Nevada 89008

Lincoln County Library
Pioche, Nevada 89043

EGAN RESOURCE MANAGEMENT PLAN

TABLE 6-1

PUBLIC COMMENT INDEX

	WILDERNESS	MINERALS	LAND DISPOSAL	ECONOMICS	GRAZING MANAGEMENT	RIPARIAN CONDITION	WILD HORSES	WILDLIFE	ORVs	CULTURAL RESOURCES	ACECs	UTILITY CORRIDORS	MISCELLANEOUS
<u>Written Comments</u>													
1. Terry Woodin	1,2,3												
2. Nevada Mining Assoc.	4-7	4-6		6									
3. White Pine Power Project								10				8	9
4. Conservation Call	1-3		11										
5. Wildlife Management Institute				14,12	16								13,15
6. Marguerite Christoph	1,2												
7. Ward T. Donley	2,3												
8. Ken Goldsmith	2,17												
9. Harold L. Dittmer													
10. Mrs. A. N. Lundholm	2		11										
11. Emil and Maxine Hrubik	1-3												
12. Eileen and Darwin Lambert	1-3												
13. Defenders of Wildlife	1-3	18,19	11								20		
14. Jeff van Ee	1-3	18,19	11										
15. National Park Service										21,22			
16. Ecology Center of So. California	1-3		11										

	WILDERNESS	MINERALS	LAND DISPOSAL	ECONOMICS	GRAZING MANAGEMENT	RIPARIAN CONDITION	WILD HORSES	WILDLIFE	ORVs	CULTURAL RESOURCES	ACECs	UTILITY CORRIDORS	MISCELLANEOUS
17. Richard H. Pough	1-3				26,27,31	29,30,							
18. The Wildlife Society				35,37,38	16,30,15	34,36		23,28,32					24-39
19. Gordon and Irene Fopiano							40						
20. Barbara Kelley	1,3												
21. Peggy Gaudy										21,41			
22. Ecology Center of So. California	1-3												
23. U.S. Forest Service, Intermountain Region													
24. Ms. Joanna G. Ichnatowicz	2,3		11										
25. Ms. Ethyl W. Thorniley													
26. Bob Langsenkamp	1-3												
27. The Wilderness Society	1-3	19,43	11										
28. Doug Hansen	1-3		11										
29. Brent Boyer													
30. Marjorie Sill	1-3												
31. Bradley Bradshaw							40						
32. Barbara Bradshaw							40						
33. Mae Bradshaw				45	44		40						
34. Regional Planning Commission	46,4			4									
35. Sierra Club, Toiyabe Chapter			11			29,47							

	WILDERNESS	MINERALS	LAND DISPOSAL	ECONOMICS	GRAZING MANAGEMENT	RIPARIAN CONDITION	WILD HORSES	WILDLIFE	ORVs	CULTURAL RESOURCES	ACECs	UTILITY CORRIDORS	MISCELLANEOUS
36. Steven Triaw	1-3												
37. Lund Town Council	48												
38. Nevada Wilderness Assoc.	1-3												
39. Eastern Nevada Trappers & Furtakers Assoc.							40						49
40. John Swanson	1-3, 50,51		11										
41. Environmental Protection Agency													50
42. White Pine County Commission	46			46								8	8
43. Steven Carter	48,53-57						40,61,63						
44. Craig Downer	1,2,59	64	11		62		65,16	60	58				52,36
45. Sierra Pacific Power Company												66	
46. Atlantic Richfield Company	1	67,68											
47. Lahontan Audubon Society	1-3		11										
48. Gold Prospectors Assoc. of America/ Reno Prospectors Supply, Inc.													
49. Art Ruggles		69											
50. Rudy Adams													
51. M. P. Boysen													
52. Charles Yoder	1-3												
53. Gayle Smith	1-3												
54. Resource Concepts Inc.				45,84	70,13, 71-83	29,78,79							30

	WILDERNESS	MINERALS	LAND DISPOSAL	ECONOMICS	GRAZING MANAGEMENT	RIPARIAN CONDITION	WILD HORSES	WILDLIFE	ORVs	CULTURAL RESOURCES	ACECs	UTILITY CORRIDORS	MISCELLANEOUS
55. B. W. Hendrix	48												
56. Thor Lane	1-3												
57. Glenn Miller	1-3												
58. Cheryl Cinoske	1-3												
59. Denise Smith	1-3												
60. Marta Porter	2												
61. Mineralogical Research Co.													
62. Guy King	1-3												
63. Ann Rosemary Kersten	1-3												
64. Betty Kersten													
65. Laura King	1-3												
66. William Kersten	1-3												
67. Gregory Ebner	1-3												
68. Earl W. Kerston	1-3												
69. Sierra Club	1-3		11	91	85-88,16 70,26,75 62	29		60,88	58,90		89		
70. White Pine Sportsmen	4,93,94						40	27	92				
71. City of Ely	4 96,100,			4									
72. Paul C. Clifford	101	97-99, 102-104		98					96				95

	WILDERNESS	MINERALS	LAND DISPOSAL	ECONOMICS	GRAZING MANAGEMENT	RIPARIAN CONDITION	WILD HORSES	WILDLIFE	ORVs	CULTURAL RESOURCES	ACECs	UTILITY CORRIDORS	MISCELLANEOUS
73. Governor Richard Bryan	105-106				62,70,26 87,88,16			60,125, 120,123,					
74. Nevada State Clearinghouse	105,106, 48,108	116,117	114,115, 118,11	35,91, 128	109,120, 122	29,80, 124	40,119	126,30, 28		110-112	89,127	107	113,92, 52,121, 15
ORAL TESTIMONY - Ely Hearing													
1. Nevada Department of Minerals	4	129,117		4									
2. Bud Hendrix	130												
3. White Pine Power Project												89,8,131	
4. Nevada Division of State Lands													
ORAL TESTIMONY - Reno Hearing													
5. Nevada Department of Minerals (Repeat of Ely Hearing, not reprinted refer to #1)													
6. Nevada Outdoor Recreation Assoc.	1-3,132		11										133
7. Terry Woodin													
8. Gary Clark	4												
9. Nevada Mining Assoc.	134-141	4,116. 129,140. 136-138		134,139, 141									
10. Rudy Adams	4,93,142			143									
11. Larry Dwyer	1,2												
12. Nina Keeney													

	WILDERNESS	MINERALS	LAND DISPOSAL	ECONOMICS	GRAZING MANAGEMENT	RIPARIAN CONDITION	WILD HORSES	WILDLIFE	ORVs	CULTURAL RESOURCES	ACECs	UTILITY CORRIDORS	MISCELLANEOUS
13. Ray Arnold	144	93											
14. Elizabeth Brownson													
15. Ross Smith		145											
16. Sierra Club, Toiyabe Chapter			11			29,146							
17. Sierra Pacific Power Company													
18. Jeffery Conrad-Forrest	1-3												
19. Sierra Club, Toiyabe Chapter	1-3,147	147											
20. Amy Mazza	2,3,147												
21. Karen Tanner	1-3												
22. Glenn Miller	1-3												
23. Dave Hornbeck	2-3,59, 148	147,149, 152											151
24. Glenn Buchanan		4											
25. Gordon Lorsung									93				

PUBLIC COMMENTS

Comment Letter 1

1835 (Lick Canyon, Nevada)
A.C. No. 89572
October 28, 1983

Merrell De Spain, Dist. Mgr.,
State Route 5
Box 1, Ely, NV 89503

Dear Mr. De Spain,

In regards to Draft EIS
regarding Park Range, Washute
Canyon, Jordan's Well, I commend
your courage in recommending
these areas and urge
you to increase their
acreage as recommended by
the Conservationists
alternative.

- 1
- 2
- 3

We have lived in Nevada
for over fifteen years. My 5
children grew up here and
value its wild beauty.
We realize the needs of miners
and ranchers but feel
the proposed acreage set
aside does not threaten
either interest.

At the hearing concerning
these lands I heard

Comment Letter 1

people complain that the
land will no longer be
available to some citizens
- phooey - I'm fast approach-
ing reaching some citizen
relations and I can still
hike in the wilderness
climb Mt Rose and feel good
when my children or others
conquer more difficult terrain
and come back to tell me of its
beauties.

The fact I am a scientist
also influences my decision
to support wilderness desig-
nation for these areas. Too
often we have rushed
into develop when we were
not ready to do so. Preser-
vation of these areas will
allow future generations to
enjoy and study these
pristine lands. Who knows

Comment Letter 1

what they'll learn, given
improved tools and methods,
if only we can preserve
this land as is.
Thank you for your
consideration

Sincerely
Jerry Woodin

Comment Letter 2

ROBERT E. WARREN
Executive Secretary
N. EDWARD WINN
Consultant

October 27, 1983

MAIL ROOM - ONE EAST FIRST STREET
RENO, NEVADA 89501
TELEPHONE (702) 323-8676

Mr. Edward F. Spang, Director
Nevada Bureau of Land Management
Post Office Box 12000
Reno, Nevada 89520

Re: Egan Resource Area Wilderness Proposals

Dear Ed:

- 4 | I am dismayed to learn the Ely District is recommending three out of the final four WSAs as wilderness. The mining (and eventually ranching) industry can be severely harmed by BLM's apparent willingness to support so much wilderness in Nevada.
- * | Enclosed is a copy of the Nevada Mining Association testimony on the BLM's proposal. I hope you can find time to read it.
- 5 | Because BLM's ground rules were laid down by the Carter-Andrus Administration, which was frequently hostile to Western interests and the concept of multiple use of the public lands, the BLM's planning assumptions suffer from a systemic bias toward wilderness and against the mining industry.
- 6 | If the mining industry loses access to these key mineral areas - some of the highest potential sites in the state - the industry will gradually diminish to an insignificant economic impact in our rural counties.
- 4 | If BLM and the Forest Service continue to recommend so many wilderness areas for Nevada, this state will move from the state with the least wilderness (one at Jarbidge) to the most in the nation.
- 7 | Additionally, when the buffer zone concept is eventually accepted by Congress (it passed the House this month), most of the industrial and agriculture activities within Nevada's valleys will fall under the surveillance (and to an alarming degree the control) of the Federal government. (See enclosed article on buffer zones, taken from the Summer Issue of the NMA BULLETIN.)

Sincerely,

Robert E. Warren

REW:v
Encl.

*Robert Warren's testimony is printed in the oral testimony section, No. 9.

Comment Letter 2

BUFFER ZONE

Cont. from page 3

Bill offers little protection for parks

delay for the Congressional review.

The bill offers little enhanced protection for the parks. Federal statutes are replete with requirements to control activity in and around parks (Clean Air Act, National Environmental Policy Act, etc.). Similarly, the existing federal project approval process has many park system safeguards already built-in. For example, the legislation establishing the U.S. Department of Transportation provided that all projects must preserve the natural beauty of the countryside, public park and recreation lands, wildlife and waterfowl refuges and historic sites. Around these basic requirements a body of law has developed requiring environmental impact statements and reviews for project impacts on water pollution, coastal zones and wetlands, endangered species and historic properties.

The meaning of "adjacent" land is unclear. In addition to its duplication of the existing safeguards, the bill fails to define adjacent land. Hundreds of thousands of acres of federal, state, local and private land could fall under the controls created by HR 2379. This imprecise nature invites constant and continued litigation. Ultimately, the courts may be forced into deciding the future of hundreds of road projects each year.

-RW-

Environmentalists sue EPA to enforce buffer zone concept

Environmentalists are suing the federal Environmental Protection Agency (EPA) in an effort to force the Reagan Administration to adopt the buffer zone (integral vista) concept of protection of visibility from within federal conservation lands.

The environmental groups claim that EPA must not permit "undesirable" activities to take place outside of national parks, wildlife refuges, and wilderness sites which might be viewed by persons from within the protected federal conservation lands.

Want controls over mining and other industries

Such activities could include mining, ranching, farming, land developments, construction (in short, any man-caused action which environmentalists may consider detrimental to the enjoyment of persons within the conservation lands). Should the buffer zone concept be adopted, environmentalists can ask the courts to limit, control or stop the "offensive" activities.

The suit is being brought by the National Parks and Conservation Association, the Environmental Defense Fund, and the Colorado Mountain Club. It is also supported by the Sierra Club, the Wilderness Society and other preservationist organizations.

The suit charges that EPA has done nothing to implement 1980 (Carter-Andrus) rules to control the lines of sight outside the boundaries of the parks, refuges and wilderness areas. The rules ask all states to develop such plans; but none have complied.

The Reagan Administration has also refused to adopt the buffer zone concept of restricting commercial and industrial activities within the line of sight of the parks and wilderness areas.

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Comment Letter 3

White Pine Power Project

A Nevada-California energy generation development in White Pine County

Development Manager:

Los Angeles Department of Water and Power
Room 931, Post Office Box 111, Los Angeles, California 90051

November 10, 1983

Mr. Merrill L. DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

Egan Draft Resource Management Plan and Environmental Impact Statement

Oral comments were presented by Mr. Robert L. Carpenter on behalf of the White Pine Power Project (WPPP) at the October 25, 1983 public hearing on the Egan Draft Resource Management Plan and Environmental Impact Statement (Egan Draft). In addition, the following comments related to the WPPP Draft Environmental Impact Statement (DEIS) are provided on the Egan Draft.

- Page 20, second paragraph of the Egan Draft reads:

"One potential utility corridor crosses east to west in the southern end of the zone."

8

In the WPPP DEIS, a utility corridor (WPPP preferred transmission line corridor to the Machacek Substation) is identified as well as the existing 230,000 volt transmission line corridor to the Machacek Substation described in the second paragraph on page 20 and shown on various maps in the Egan Draft.

- Page 20, fourth paragraph of the Egan Draft reads:

"Up to two north-south and one east-west utility corridors have been identified in this zone."

8

The WPPP DEIS identifies a total of four north-south corridors in this zone. Two of the four north-south corridors are potential railroad corridors (with one potential railroad corridor including a potential water supply pipeline) identified for the alternative WPPP Butte Valley Site. There are two potential transmission line corridors running north to south

Comment Letter 3

Mr. Merrill L. DeSpain

-2-

November 10, 1983

for the WPPP Butte Valley Site and the preferred WPPP North Steptoe Valley Site. The WPPP preferred transmission line corridor from the Butte Valley Site or the North Steptoe Valley Site (east-west) to the Machacek Substation is also identified in this zone. As previously mentioned, there is an existing 230,000 volt transmission line corridor to the Machacek substation in this zone.

- Page 20, sixth paragraph of the Egan Draft reads:

8

"Two east-west and one north-south utility corridors have been identified for this zone."

The WPPP DEIS identifies two potential and one existing utility corridor in Zone 3. The WPPP preferred transmission line corridors to the Machacek Substation and the railroad and water supply corridor for the Butte Valley Site are the two potential east-west corridors. The existing utility corridor is a portion of the 230,000 volt transmission system to Machacek Substation from Gonder Substation. The north-south corridor contains proposed railroad, water supply pipelines, and transmission lines for WPPP.

- Page 21, first paragraph of the Egan Draft reads:

8

"One potential north-south utility corridor exists in this zone."

There is a potential east-west utility corridor that is not mentioned but is shown on the southern portion of Zone 5 on the preferred alternative map (page 47 of the Egan Draft). Since this corridor is not a WPPP-related corridor, it is assumed that it is a proposed corridor for some other project.

- Alternative A, Alternative B, and Alternative E will adversely affect the WPPP planning for its linear facilities. As stated at the October 25, 1983 public hearing, the case-by-case processing hinders development of long-range planning. Restricting the utility corridors to the existing corridors, Alternative B and Alternative E, would preclude WPPP from constructing transmission lines to McCullough Switching Station. Such a restriction would effectively terminate WPPP. Alternative A would allow WPPP to process its corridor needs on a case-by-case basis, but future projects would cause disorderly and unplanned patterns of rights-of-way.

9

- On page 44 of the Egan Draft, Requirement 24 restricts the time period in which utility construction of a transmission or utility facility can be built. Inflexible restrictions such as that proposed could cause WPPP unwarranted difficulty

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89

Comment Letter 3

Mr. Merrill L. DeSpain

-3-

November 10, 1983

10

in constructing linear facilities such as the transmission lines, water pipelines, and the railroad. On the WPPP site itself, it would appear that little would be gained by such restrictions since the site will be fenced around its entire boundary, thereby deterring use of the site by wildlife. It is recommended that some flexibility should be incorporated into Requirement 24 to allow deviation from the restrictions if sufficient need exists for a utility to continue its construction of a linear facility through grouse strutting, nesting, or wintering areas or other critical areas during the restrictive time periods. Under flexible requirements, the utility could still be required to schedule its construction to accommodate the restrictive time periods, but the utility could also overlap the construction time periods should an unforeseeable delay occur in the construction schedule. A method of balancing the anticipated impacts on the wildlife cycle, the construction requirements, and costs of delay needs to be considered.

Thank you for this opportunity to express WPPP concerns on the Egan Draft Resource Management Plan and Environmental Impact Statement. If you have any questions on the above comments, please contact Mr. Michael Yamada at (213) 481-4102.

Sincerely,

Eldon A. Cotton
ELDON A. COTTON
Project Manager

cc: Robert L. Carpenter
Michael Yamada

Comment Letter 4



CONSERVATION CALL
3942 Hughes Court
San Diego, Ca. 92116

16 November 1983

Telephone: ~~771-47~~ ⁶¹⁹ 583-8486

Merrill DeSpain
District Manager, Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89803

Dear Mr. DeSpain:

We urge that the four WSAs you have studying in your district be established as wildernesses.

1 Our information indicates that a combination of the Preferred Alternative and the Wilderness Emphasis Alternative would make up an excellent wilderness of the Goshute Canyon Area. Friends, formerly of San Diego, report this as a hiker/backpacker's delight that should total 28,000 acres.

2 We urge the establishment of a South Egan Range wilderness. The 57,600 acres as set forth in Preferred Alternative would surely make a very fine wilderness.

We are glad to endorse the Park Range wilderness of 46,831 acres. As one who hails from a state (Illinois) that once had tall grass prairies, I am apaticularly pleased that some of Nevada's grassland is slated for preservation.

3 We commend the proposed Riordan's Well wilderness, but suggest that if this is, as mentioned, a most important bird of prey habitat, it should be expanded to 45,791 acres, with hopefully, the addition of those 400 acres dropped because of supposed minerals.

11 Finally, we strongly oppose all large acreage identifications shown in the Resource Management Plan as listed for sale or any other disposal.

Sincerely,
Roscoe A. Poland
Roscoe A. Poland, Director

AS WE SAVE THE NATURAL WORLD, WE ALSO SAVE OURSELVES

Comment Letter 5



Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

November 22, 1983

Mr. Merrill L. DeSpain
Ely District Manager
Bureau of Land Management
SR5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

The Wildlife Management Institute is pleased to comment on EGAN DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, Nevada.

The plan is typical of BLM plans prepared in the last six months. Grazing is continued at the three year average level with no reductions. Data collected in the past are ignored, and meaningful decisions are postponed for five years of "monitoring". Then, grazing plans will be prepared that meet the permittees' approval. And with the Administration determined to reduce professional manpower levels, the monitoring will have to be done by fewer personnel.

The plan's benefits for wildlife are hypothetical, based on reduced funding levels and with no meaningful participation by the Nevada Department of Wildlife. The plan is not satisfactory for wildlife or as a grazing plan.

Subsidies to the 52 active permittees are substantial, as they are in most grazing plans on BLM Resource Areas.

Range improvements for livestock will cost \$494,225 or an average subsidy of \$9,504 for each of the 52 active permittees. These improvements will create 4,747 new AUM at an average cost of \$104.11 per AUM. If the interest costs were only 8 percent to the United States, the annual interest would be \$8.33 per new AUM. The permittee will pay only \$1.40 annual grazing fee, 1/6 of the annual interest. We ask "who is getting the free ride"?

12 A hypothetical long-term increase of 12,346 AUM is predicted from adoption of as yet unspecified grazing systems (if, of course, the permittees approve). If this 10 percent increase in capacity is possible sometime in the future, why not do it now and save the almost half million dollars to be spent for range improvements?

DEDICATED TO WILDLIFE SINCE 1911

Comment Letter 5

Mr. Merrill L. DeSpain

-2-

November 22, 1983

Some specific comments follow:

Page 4 - Table S1, Summary of Impacts. This is not satisfactory. Impacts are not comparable when they are categorized only by the words "significant or insignificant".

Page 11 - right column, 1st paragraph. The Egan RMP will establish a framework by "determining what resources will be given management emphasis". Yet on page 3, issues, it specifies that only range management, realty actions and wilderness will be addressed. Which is correct?

Page 13 - Planning Issue 1, question 2. A better term is how can range use be "controlled" to protect riparian areas, rather than "administered". The problem is one of keeping the cows out of the creek.

13 | Page 19, Number 6, Alternative E. A no grazing alternative is politically impossible to adopt. Consideration of it is a waste of everyone's time.

Page 19. The last paragraph needs emphasis. This area provides winter range for the state's largest deer herd.

Page 37, 1st paragraph. The final resource plan and decision. Plan may consist of any combination of alternatives. This makes a joke of all public input in the draft and final EIS.

Page 61, 5th paragraph. The importance of BLM deer winter range should be emphasized, not buried in the text.

14 | Page 77, paragraph 6. At least qualify the market value of a BLM AUM. From reading this, one would gather it is a legitimate, government recognized value. That is not so.

Page 94, Determination of significant impacts.

15 |

	Thresholds	
Livestock, Change of 10 percent		Significant
Rancher, Change of 5 percent		Insignificant
Wildlife, Change of 15 percent		Insignificant
Big Game		Significant

Why the discrepancy?

16 | Page 97. What proportion of the 10 percent long-term increase in AUM will be allocated to wildlife?

12 |

In the second paragraph of page 106 we find the nuts and bolts of the plan. All the forage increase will have, in the long term, an insignificant beneficial impact. Only 3.9 new jobs will be created, yet the taxpayers of the United States will be asked to donate almost half a million dollars to do that. Priorities need re-examination.

Comment Letter 5

Mr. Merrill L. DeSpain

-3-

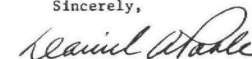
November 22, 1983

There are few to no details in the plan. The state's reasonable numbers goals are not tabulated nor are forage allocations to reach those goals. The Nevada Department of Wildlife must be a full partner in a management plan for an area of this importance to wildlife.

There is not a section on or description of the monitoring on which the decision will be based.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,



Daniel A. Poole
President

DAP:msm

Comment Letter 6

Comment Letter 6

4435 Tilden Ave. St.
San Diego, CA 92107
November 21, 1983

Marcell DeSpain, Ely District Manager
Bureau of Land Management
Dear Sir,

1 | The Egan Resource Area has some fine areas suitable, in my opinion, for wilderness protection. For one, Shoshone Canyon WSA would be a valuable 28,600 acre wilderness. It has Shoshone Cave Geological Area for the spelunkers. I commend the BLM for recommending Park Range WSA for a 46,831 acre wilderness. The virgin grasslands and meadows and cliffs make it very desirable. I am pleased, too, that the BLM has found the Riverton Well WSA suitable for a 37,542 acre wilderness. This area is important as a bird raptor location. South Egan Range WSA has not been recommended for wilderness protection but I feel it should be because it qualifies

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and it protects birds of prey as does the Riverton Well WSA.

Sincerely,
Marguerite Christoph

Comment Letter 7

9745 Lamar Street
Spring Valley, CA 92077
November 22, 1983

Mr. Merrill DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89703

Dear Mr. DeSpain:

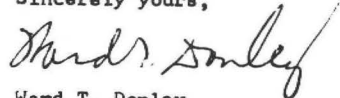
I wish to make comment concerning the possible designation of certain areas as wilderness within the Egan Resource Area. Let me first express my appreciation for the wildernesses already established in your district. Land, a finite asset, cannot be restored to its original form once its pristine state has been violated. For that reason, the concept of wilderness is vital in this day of rapid despoliation of the land that one can see in virtually every corner of our country.

I wish to make the following brief remarks:

- Goshute Canyon unquestionably merits consideration as a wilderness and, in my opinion, there should be no hesitation by the Bureau of Land Management in so recommending it.
- Riordan's Well has been recommended as wilderness but not at an acreage level commensurate to realize its full potential. Since it is an important bird raptor location, the 37, 542 acres currently in the recommendation ought to be enlarged.
- The South Egan Range has not been recommended but should be. It appears comparable to Riordan's Well in its wildlife assets and really should not be left out as a wilderness area.

Thank you for your kind attention to this letter.

Sincerely yours,



Ward T. Donley

Comment Letter 8

Ken Goldsmith
555 Forest Rd
Northford, CT 06472
Nov 25, 1983

Dear Sirs,

I wish to go on record as strongly supporting Alt. B of the Egan RMP.

In particular, I ~~urge~~ urge wilderness designation for all four USA's. As a frequent visitor to the Internationa West (spending my tourist \$ in Nevada), I feel qualified to say that designating a few of the unique, undeveloped mountain ranges of the state (as distinct wilderness) will greatly enhance their attraction to visitors while preserving vital irreplaceable natural areas. The recommendations (in the preferred Alternative) for the Park Range & Riordan's Well & Goshute Canyon are excellent, but the non-wilderness recommendation for the South Egan Range is a travesty. This is a beautiful mountain area with outstanding recreational & natural features. I urge you not to give it to local narrow minded & hood-winkers interests & preserve this area for the people of Nevada & future generations.

The EIS does have a couple of problems. First, it is unclear exactly what areas are included & excluded in the USA's in ~~the~~ each alternative. What exactly are the boundaries? Maps of each

Comment Letter 8

area would be a great help. Second, all of the discussions of actions & effects of each alternative are rather vague & generalised. ~~What~~^{From what} condition is each riparian area in, and what is its expected condition under each alternative? Here again, maps would help.

Sincerely,
[Signature]

73

Comment Letter 9



11-25-83

DEAR Mr DeSpain,
DISTRICT MGR. BLY, BLM

IN CONSIDERATION OF AREAS SUITABLE FOR WILDERNESS, YOUR BLY DISTRICT CERTAINLY MUST HOLD A MULTITUDE OF PLACES THAT QUALIFY.

IN THE FEW TIMES THAT I HAVE VISITED SOME OF THESE PLACES, IT IS NOT WITHIN MY PROVINCE TO JUDGE. I WOULD BE PREJUDICED BECAUSE I COME FROM CALIFORNIA. JUST THE SAME THE AREAS UNDER CONSIDERATION DO HAVE FEATURES MANY OF WHICH ARE IMMEDIATELY IDENTIFIABLE, BUT MANY THAT HAVE ESCAPED MY SCRUTINY. FORGIVE, BUT PLEASE DO CONSIDER ALL THE AVERAGE IN THE BLY DISTRICT THAT ARE BEING CONSIDERED AND DON'T BE STINGY.

I'M AN "ALL OR NOTHING AT ALL" ADVOCATE.

CONSIDER WHAT YOU ARE TRYING TO SAVE AND PROTECT. NOT FOR ME, BUT, FOR FUTURE "ME" PEOPLE THAT WANT TO COME TO NEVADA AND ENJOY MORE THAN JUST THE CASINOS, THE FANCY SHOWS AND ENTERTAINERS, THE GAMBLING. SOME OF US LIKE THE "NATURAL" STUFF THAT OUR COUNTRY WAS BLESSED WITH.

TRY TO SAVE SOME OF YOUR STATE. DON'T LEAVE IT FALL BY THE WAY FOR PROMOTERS, COMMERCIAL ENTERPRISES TO RUIN. KEEP SOME OF IT - NO - AS MUCH AS IS POSSIBLE TODAY - AS IS.

[Signature]

HAROLD L. DITTMER
3911 FERNWOOD AVE
LOS ANGELES CA 90027

Comment Letter 10

December 24, 1983

Merrill DeSpain,
Ely Dist. Mgr., BLM,
Star Route, Box 1,
Ely, NV 89703

Dear Mr. DeSpain,

Your recommendations for Goshute
Canyon with the Goshute Cave Geological
Area, Park Range and Riordan's Well, are
commendable. My sincere thanks.

Why, or what is the reason that South
Egan Range has not been recommended?
It is a great haven for birds and other
wildlife the same as the abundant
wildlife in Riordan's Well.

I herein request that you do not sell
or dispose of the large acreages that are
mentioned in the Resource Mgmt Plan.

Sincerely,
G. W. Schrodeman

(MMS)

79 PEARCE MITCHELL PLACE
STANFORD, CA 94306

Comment Letter 11

P. O. Box 202
Redwood Valley, CA 95470
Nov. 29, 1983

Mr. Merrill DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89301

Dear Mr. DeSpain:

Thanks to the BLM for recommending as wilder-
ness areas Park Range WSA and Riordan's Well WSA.

3 | However, we would like to see Riordan's Well
increased to 45,791 acres, as it is an important
raptor location.

1 | We feel Goshute Canyon WSA deserves full
2 | recognition as a wilderness area. Also, South
Egan Range WSA (listed in BLM's Draft EIS) would
be a very desirable wilderness.

Very truly yours,

Emil Hrubik
Emil Hrubik
Maxine Hrubik
Maxine Hrubik

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Comment Letter 12

423 Route 2
Luray, Virginia 22835

November 28, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
U.S. Dept. of Interior
Ely, Nevada 89803

Dear Mr. DeSpain:

My wife and I want your records to show our strong support for the top priority your recommendations favor for wilderness in Goshute Canyon (NV-040-015), Park Range (154), and Riordan's Well (166). Also our strong hope that you will upgrade wilderness emphasis in the South Egan Range (168, 172).

Though we're not experts on these areas (a status we've come close to on some wild parts of Nevada), we've scouted them from airplane and car quite a number of times and hiked into the Egan-Cherry Creek mountain system at intervals for many years. We feel this system has outstanding wilderness charm in quite a few places, including the study areas now involved. We've enjoyed the spectacular geology, petroglyphs, the wildlife and the vegetation, including evergreen forests and our favorite species, bristlecone pine, in impressive situations. These longest-lived trees on earth generate deep feelings of the primeval in almost everyone who visits them and are the subject of innumerable photographs and of extensive scientific study in relation to climatic patterns, archeological dating, rates of erosion, secrets of longevity, and many other matters.

We'd like to see top emphasis on substantial-sized wilderness in all four areas named--something like a hundred square miles in South Egan, at least half that much in the Goshute Canyon area, and around 75 square miles each in Park Range (which amount you now recommend) and in Riordan's Well--and believe these acreages could be achieved without significant hurt to other interests.

I've prospected and mined in Nevada--as well as been a working member of a Nevada ranching family--yet it doesn't seem to me that these valid interests should have top priority on more than 95% of the land. Wilderness is genuinely important in lastingly protecting the quality of the overall resource as well as for recreation and adventure for an increasing number of Americans. The proportion of wilderness priority we favor seems wise now. If it should happen not to be wise forever, the people and government of another century, in the light of needs not now predictable, could restudy and change as necessary--because we have cared enough to leave them substantial areas not yet harmed.

Sincerely,

Edwin and Darwin Lambert
Edwin and Darwin Lambert
Edwin Lambert

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Comment Letter 13

Defenders OF WILDLIFE

November 28, 1983

Mr. Merrill DeSpain
Ely District Manager
U.S. Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89803

Dear Mr. DeSpain:

On behalf of our Nevada members, Defenders of Wildlife submits this letter as our comments and recommendations on your Draft Environmental Impact Statement and Resource Management Plan (EIS/RMP) for the Egan Resource Area. If possible, please include this letter in the appropriate hearing record.

We generally support and applaud BLM's wilderness recommendations outlined in the Preferred Alternative for three of the four Wilderness Study Areas within the Egan Resource Area. However, we believe that additional wilderness protection is necessary and appropriate.

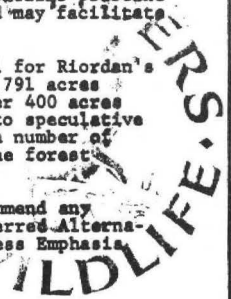
For example, we recommend that the Goshute Canyon wilderness proposal be increased to about 28,600 acres between the Preferred Alternative and the Wilderness Emphasis Alternative. As you know, this is a magnificent roadless area, with important natural values, including cutthroat trout, spotted bats, and bristlecone pine. Expanded wilderness protection would benefit these and other values, and is compatible with the Goshute Canyon Natural Area.

With respect to the Park Range, we commend BLM for the outstanding 46,831-acre wilderness recommendation. This area contains pristine meadows and grasslands, which are rare elsewhere and may facilitate scientific studies.

While we support the 37,542-acre wilderness proposal for Riordan's Well, we believe this should be increased to the 45,791 acres within the Wilderness Alternative, along with another 400 acres on the west side which were improperly omitted due to speculative mineral potential. This Wilderness Study Area has a number of impressive primitive values, including ponderosa pine forest stands and raptor sites.

We are disappointed, however, that BLM did not recommend any wilderness for the South Egan Range within the Preferred Alternative. We feel that the 57,660 acres in the Wilderness Emphasis

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510



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Comment Letter 13

Comment Letter 13

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Alternative is desirable and necessary. This Wilderness Study Area, with its white fir forests, ancient bristlecones, and limestone cliffs, possesses valuable wildlife habitats. Abundant populations of deer, raptors, and other species will benefit.

Finally, we wish to express several overall concerns. First, we hope that BLM will consider these wilderness recommendations in the proper perspective. If Congress approves all of these recommendations, well over 90% of BLM lands will remain under multiple use management. Stated another way, since federal lands should be managed to include wilderness and to recognize the public's support for wilderness protection, it is certainly reasonable to set aside this relatively small fraction of public lands within your jurisdiction as wilderness. It is also important to underscore that fishing, hunting, hiking, and other passive recreational activities are compatible with and allowed in wilderness, as is grazing.

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Second, qualified Wilderness Study Areas should receive wilderness protection and not be denied wilderness status because of speculative mineral potential. Mineral surveys should focus on public lands generally, both in and out of Wilderness Study Areas, to determine the location of marketable reserves, and to compare mineral values in and out of Wilderness Study Areas. This level of precision and comparison is extremely important. If marketable mineral reserves are not located or identified within a Wilderness Study Area, these areas should not be disqualified for wilderness protection simply because some degree of speculation on possible future developments may linger among some commercial interests. Of course, where demonstrable marketable reserves do occur in Wilderness Study Areas, this requires a more difficult balancing of competing values. In some instances, the designation of Areas of Critical Environmental Concern may provide an acceptable compromise. Thus, we recommend that, whenever possible, mineral analyses occur in a comprehensive fashion through all or most of a Resource Area.

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Lastly, we are greatly disappointed that both the Preferred Alternative and Alternative "C" propose the sale of about 80,000 acres for community expansion, ranch annexation, and agricultural programs. We strenuously oppose any such large-scale proposals to sell or dispose of public lands. Indeed, the White House, through the Property Review Board and the Department of the Interior, have reportedly discontinued the controversial and ambitious "asset management program." We, therefore, urge you to reconsider and reject these land sales proposals.

Please keep us informed on your planning activities and management actions affecting the above Wilderness Study Areas.

3.

Thank you very much for considering our views.

Sincerely,

Richard Spotts

Richard Spotts
California/Nevada Representative
Defenders of Wildlife

5604 Rosedale Way
Sacramento, CA 95822
(916) 442-6386

RS/js

Comment Letter 14

2092 Heritage Oaks
Las Vegas, Nevada 89109
December 1, 1983

Merrill LeSpain
Ely District Manager
U.S. Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89803

Dear Mr. DeSpain:

This letter is in support of wilderness recommendations for portions of four WSA's within your district: Goshute Canyon area, South Egan Range, Park Range, and Riordan's Well. This letter also will register my concern with the Bureau's assessment of mineral potentials, or mineral resources, within WSA's. Further, I wish to express my opposition to the sale of public lands.

I am in sympathy with any attempt to consolidate public and private lands for better land management practices. I also am in favor of allowing "land locked" Nevada communities some public lands so the communities may expand and prosper. I am not in favor of the sale of public lands to accomplish those objectives unless an approach similar to the "Santini-Burton" approach is used. (I had a part in the passage of the Santini-Burton bill which, as you probably are aware, was used to allow the city of Las Vegas to expand while critical, environmentally sensitive lands in the Lake Tahoe area were purchased.) When the proceeds of public land sales merely go to the general fund of the Treasury Department, and private lands await Federal Funds for purchase, I am strongly opposed to the Bureau selling valuable public lands. I urge your district to give some thought to the land exchange option, and also to the passage of "Santini-Burton" legislation that would allow the consolidation of both public and private lands when land exchanges prove to be too lengthy or unproductive.

The Bureau in many of its EIS'S has attempted to determine the value of the mineral resources within a WSA without regard to the overall quantity and value of those resources that lie outside the WSA. Further, the Bureau has prejudged the U.S. Geological and the Congress in determining the relative value of those resources. I urge the Bureau to consider the available information on minerals within a WSA, but leave the final evaluations to the U.S.G.S. and Congress.

Comment Letter 14

1 I support the recommendations that a combination of the "Preferred Alternative" and the "Wilderness Emphasis Alternative" be considered for the Goshute Canyon area. The 5009 acre Goshute Canyon Natural Area together with Exchequer Peak and the Goshute Cave should be included in any recommendation.

2 Although the South Egan Range has not recommended for wilderness, I believe the area described in the "Wilderness Emphasis Alternative" should be recommended for wilderness. Most of the mineral conflicts and road-access conflicts have been eliminated in the Alternative, and I see no reason why the BLM should exclude this area from its wilderness recommendation.

The 46,831 acres recommended by the BLM for wilderness in the Park range is excellent, and I support that recommendation. The ungrazed meadows and grasslands in this area area a unique characteristic of this area .

3 While I support the BLM's recommendation for wilderness in the Riordan's Well area, I see no reason why the "Wilderness Alternative" was dismissed. I recommend that the BLM reconsider it's decision and adopt their "wilderness Alternative" for this area.

Thank you for the opportunity to comment on this important topic for your district.

Sincerely,

Jeff van Ee
Jeff van Ee

Comment Letter 15



United States Department of the Interior

NATIONAL PARK SERVICE
WESTERN REGION
160 GOLDEN GATE AVENUE, BOX 96053
SAN FRANCISCO, CALIFORNIA 94102

U. S. DEPT. REFERENCE TO

L7617 (WR-RPE)

December 1, 1983

Memorandum

To: District Manager, Bureau of Land Management, Ely, Nevada
From: **ACTIVED** Regional Director, Western Region
Subject: Egan Draft Resource Management Plan and Environmental Impact Statement (DES 83/63)

In response to your request, we have reviewed the subject document and have the following comments.

In Chapter 3, Affected Environment, the draft document totally fails to address cultural resources. Therefore, we believe that, in order to fulfill the requirements of NEPA and the National Historic Preservation Act and its implementing regulations, 36 CFR 800, the Bureau of Land Management should contact the State Historic Officer and develop a plan for (1) estimating possible archeological resources; (2) summarizing known values based on a review of State Archeological Site files as well as the Bureau of Land Management's State Office Archeological Site files; and (3) initiating archeological field reconnaissance studies in the project area if these have not already been started. At the same time, any future environmental documents prepared for this project area should indicate BLM's willingness and procedures for undertaking site specific surveys of all planned projects within the area, including maintenance bases, access roads, fencelines, springhead modifications, etc., as agreed upon with the State Historic Preservation Officer.

At present, we are reviewing the Draft Environmental Statement for the White Pine Power Project (DES-83/71) which appears to involve portions of the Egan Resource Area. Consequently, we may have additional cultural resource comments pertinent to the Egan Area in our review response on the White Pine statement.

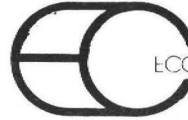
cc:
WASO (792)
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78

Comment Letter 16



ECOLOGY CENTER OF SOUTHERN CALIFORNIA
Project of Educational Communications, Inc.
P.O. Box 37473, Los Angeles, CA 90009

Telephone: (213) 559-9160

December 5, 1983

Mr. Merrill DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89301

Dear Mr. De Spain:

We understand your district is considering the suitability of the four below areas of the Egan Resource Area, for Wilderness Designation. We would like to present to you our recommendations for same:

- 1 | 1. Goshute Canyon WSA: This has especially high wilderness values, including the Goshute Cave Geological Area. We think it possible as well as desirable to have a 28,600 wilderness of outstanding qualities by combining two of the alternatives listed by BLM.
- 2 | 2. South Egan Range WSA: 57,600 acres listed in your Draft EIS would make a fine wilderness. Also an important raptor location.
- 3 | 3. Park Range WSA, one of Nevada's last remaining grasslands. We wish to commend BLM for recommending 46,831 acres.
- 3 | 4. Riordan's Well WSA: we recommend 45,791 acres, over the proposed 37,542, because this area is an important bird raptor location. There are seventeen peaks over 8000 feet.

11 | We are opposing 79,800 acres recommendation on the grounds that the Interior Department has announced they are no longer considering large scale land sales.

We urge a more comprehensive environmental stewardship for these areas, and trust our comments will be part of your records.

Sincerely,

Elaine Stansfield
Assistant Director

ES:mp

Comment Letter 17

RICHARD H. POUGH
38 Highbrook Avenue
Pelham, New York 10803

December 2, 1983

Mr. Merrill DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89303

Dear Mr. DeSpain:

We are fortunate to have the Bureau of Land Management protecting so much of our country's land in Nevada. I have read with interest BLM's recommendations for Wilderness Study Areas in the Egan Resource Area and would appreciate if you would consider my comments and see that they are put into the record.

So much land qualifies as Wilderness Study Areas for inclusion into the National Wilderness System that I believe it is essential to eliminate agricultural, residential and other areas that might cause disputes now or in the future.

1

The Goshute Canyon Area has naturalness, solitude and outstanding primitive recreational opportunities. 28,600 acres, combining areas BLM recommends as Preferred Alternatives and Wilderness Emphasis Alternatives, are needed to protect Goshute Canyon, Goshute Cave and the area that surrounds Exchange Peak. The area is already used for rugged outdoor recreation.

The Park Range in the westernmost part of the Egan Resource Area justly deserves BLM's 46,831-acre recommendation. We are fortunate that virgin grasslands are still protected by the remoteness of the area here and the surrounding rugged cliffs.

2

The South Egan Range deserves to be included in the National Wilderness System. 57,660 acres (a BLM Emphasis Alternative), including the entire area from Brown Knoll to Sheep Pass Canyon, has outstanding wilderness values -- ancient bristlecone pines, white fir forests, nesting areas for raptors, deer habitat, limestone cliffs, caves, etc., etc.

Comment Letter 17

RICHARD H. POUGH
38 Highbrook Avenue
Pelham, New York

- 2 -

3

Riordan's Well to the south would be my final recommendation for inclusion into our National Wilderness System, stretching the area recommended by BLM as a Preferred Alternative to a more viable 45,791 acres. This would include part of the Grant Range, Forest Service lands, Blue Eagle (recommended by BLM in another resource area). 18 peaks in the range are higher than 8,000 feet, including Heath Peak at 9,352 feet.

Yours sincerely,



Richard H. Pough

The Wildlife Society

Nevada Chapter

December 6, 1983



Mr. Merrill DeSpain
District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89301

Dear Mr. DeSpain:

The Nevada Chapter of The Wildlife Society is a non-profit organization comprised of professional wildlife biologists. The Society is dedicated to the wise management and conservation of the wildlife resources and the habitat upon which all wildlife rely for life. Ecology is the primary scientific discipline of the wildlife profession; and, therefore, the interests of the Society embrace the interactions of all organisms with their environment. The Society recognizes that man, as well as other organisms, has a total dependency upon the environment and it is the Society's belief that wildlife, in its myriad forms, is basic to the maintenance of a quality human existence.

The Nevada Chapter of The Wildlife Society appreciates the opportunity to review and provide comments on the Draft Egan Resource Management Plan EIS. We do have some serious concerns for the welfare and future status of wildlife under the preferred alternative of this proposed plan. These concerns are reflected in our specific comments which follow.

CHAPTER 1

Page 12 - Issues and Criteria

On March 29, 1982, the Ely District (BLM) issued a release entitled "Issues and Planning Criteria for the Egan Resource Management Plan". Within the release, four planning issues were listed as critical for inclusion in the RMP. Issue #3 was omitted from the draft RMP and needs to be included. In fact, none of the six issues included within the broader Issue #3 are part of the draft RMP. The issue in question concerns native fish species being considered by U.S.F.W.S. as additions to the list of endangered and threatened fish species.

Page 14 - Planning Issue Number II

As written, the planning issue involving land ownership is not complete. We feel that an all-encompassing land adjustment program should include acquisition of important lands as well as disposal. There are undoubtedly lands within the Egan Resource Area now in private ownership which would be better managed under public ownership. Methods of acquisition should include both purchase and exchange.

The International Organization of Professional Wildlife Ecologists and Managers

Mr. Merrill DeSpain
December 6, 1983
Page 2

CHAPTER 2

Page 19 - Management Alternatives

24 | The alternatives need to be clearly defined. As written, there is little to distinguish between the Preferred Alternative and Alternative C.

25 | The document needs to define "fragile and unique resources", "natural resource values", and "goods and services". Does "goods and services" include those provided by increased wildlife-oriented recreation? Also, does the BLM know the "sustained use capabilities" of the resources under discussion?

Page 21 - Management Objectives Rationale

26 | The document is based on successional changes which are not clearly defined or defensible. It is difficult to relate between successional stage and range condition, trend and potential. The baseline ("desired management level") changed with each alternative and each zone. This makes analysis and comparison difficult.

26 | Additionally, it is evident from the appendices (13-17) that the proposed management actions will not result in the desired management level. In most cases, the anticipated level resulting from the action is drastically different than the desired level. If such is the case, the use of successional stages as a planning tool seems to be inadequate.

Page 22 - Rangeland Management

16 | How will the increased AUMs provided by range improvements be distributed between wild horses and wildlife?

Page 26 - Rangeland Management

27 | How can rangeland improvement projects be justified economically when there will be a reduction in AUMs? If this alternative is intended to protect and enhance natural resource values, why are no wildlife habitat improvement projects included?

Page 27 - Item #7

28 | Why is there no mention of bighorn sheep reintroductions?

Page 27 - Long Term Action #2

29 | Specifically, what corrective actions would be taken to improve riparian and/or wetland areas?

Page 29 - Alternative C

24 | Except for wilderness this is identical to the Preferred Alternative. Why is it repeated?

Comment Letter 18

Mr. Merrill DeSpain
December 6, 1983
Page 3

Page 32 - Alternative D

30 | The increase in livestock AUMs seems excessive. We are particularly concerned about the 237% increase in Zone 1 which presently has conflicts between cattle and deer.

Page 33 - Short Term Action #5

30 | It sounds as if management to improve riparian areas will be instituted only if "noticeable gains would be made by livestock operators". Does the BLM advocate ignoring Executive Orders and existing policy which direct the agency to protect and enhance riparian and wetland areas? With the enormous increase in AUMs it would seem reasonable that riparian areas will continue to suffer at an accelerated rate of degradation.

Page 33 - Long Term Actions

In the long term it seems that this alternative would be detrimental to all resources.

Page 39 - Selective Management

31 | We feel that selective management is not appropriate or effective. The BLM has an obligation to manage every acre under its administration. There are more demands and interests on the public lands than just allotment management planning.

Page 43 - Item 9

Allowing intensive livestock grazing within riparian areas causes a vegetative conversion. Therefore actions under most of the alternatives contradict this operating procedure.

Page 43 - Item 12

Soils inventories are generally low priority projects and take years to complete. Will the BLM hold all conversion projects in abeyance until soils inventories are completed and approved?

Page 43 - Item 18

32 | What is meant by "whenever feasible"? It is state law that water must be left at the source for wildlife (NRS 533.387).

CHAPTER 3

Page 57 - Vegetation

33 | A map of stream riparian zones should be included. This 4,245 acres of critical habitat is not well addressed but lumped into 42,417 acres of "meadow". Appendices 7-9 cover some of the information but impacts under different alternatives are not discussed. Also, the vegetation map is at the end of Chapter 3, not Chapter 2.

Comment Letter 18

Mr. Merrill DeSpain
December 6, 1983
Page 4

Page 60 - Wildlife

34,25 | Does Table 3-1 include stream riparian areas? Also, summer and winter miles of stream should be defined.

Page 61 - Mule Deer

Did the Ruby Mountain deer herd really grow 30% between 1981 and 1982? Why are all the facts documented with "personal communication"? Are there no documented facts for wildlife populations around Ely?

Page 62 - Bighorn Sheep

28 | The document should address potential release sites for reintroductions.

Page 63 - Aquatics

23 | The document should state that four species of endemic fish are listed as category 1 or 2 proposed for listing as T&E species. As such, these species should receive priority habitat management consideration, but maintenance of habitat and potential reintroductions are never addressed.

Page 77 - Wildlife and Recreation

35 | Hunter cost estimates listed here should be used in analysis of the alternatives. There is a large unsatisfied hunter demand which would be partially satisfied with increased deer populations.

CHAPTER 4

Page 91 - Introduction

There will be significant impacts to soil and water quality. The increased number of AUMs under some alternatives will have a deleterious impact on both soil and water quality. Water quality and the condition and trend of riparian areas have a direct relationship.

Page 92 - Item 13

36 | If stream habitat conditions are currently declining, how can soil and water quality not be an issue?

Pages 93-94 - Livestock and Wildlife

15 | Percentage changes (relating to significant impacts) should be the same for both wildlife and livestock.

Page 95 - Economics

37 | What would be the result if a significant decline in rancher wealth occurred? Is the BLM ready to guarantee the affected ranchers a particular level of ranch income? How will these significant impact determinations be used?

Comment Letter 18

Mr. Merrill DeSpain
December 6, 1983
Page 5

Page 96 - Preferred Alternative

- 16 How will the additional AUMs be distributed? Will they be all given to livestock or split among livestock, wildlife and wild horses? Who will make this determination, and how will it be made?

Pages 97-98 - Wildlife

- 31 Generally speaking, the wildlife section is flawed and contradictory. All wildlife numbers and/or habitat improvement is tied to areas placed under grazing management systems. However, only 29% of the allotments are considered in the I category. The remaining 71% of the allotments are low priority and may or may not be put under grazing systems. What happens to wildlife habitat in these areas? It appears that positive long-term impacts for small game, upland game and raptors are tied to riparian areas. The RMP states that all these wildlife populations will increase over the long term. However, Item 6 states that "stream riparian habitat will remain the same or move toward a better condition class than it is presently". The motivation for improvement is grazing management, which will only occur on 29% of the allotments. How can riparian-dependent wildlife increase significantly over the long term when it is unknown how (or even if) the riparian areas will improve? Additionally, grazing systems will not significantly improve riparian areas which are already in poor condition at the time the AMP is implemented. In this type of situation, grazing will have to be excluded. Once conditions have improved, the riparian area can be maintained through implementation of a grazing system.

Page 98 - Wildlife

- 35 A section dealing with increased hunter opportunity should be added. The increased economic benefits from increased recreation should also be analyzed.

Page 110 - Item 6

Supporting any alternative which will result in degradation of riparian habitat directly conflicts with existing Executive Orders and BLM policy regarding management of riparian and wetland areas. In some cases, riparian condition class cannot decline, since it is poor.

- 23 There is no discussion on impacts to the Utah (Bonneville) cutthroat trout, White River spinedace, White River desert sucker, Newark Valley chub, bald eagle and ferruginous hawk, all of which are threatened, endangered or sensitive. Continued deterioration of riparian areas will directly or indirectly impact the above-mentioned species.

Page 115 - Wildlife Associated Recreation

- 38 We do not agree that a reduction in wildlife-associated recreation expenditures is not significant. Total ranching economy is not a significant part of the area's total economy, yet the RMP includes an extensive economic analysis for ranching.

Page 116 - Alternative B

- 27 The goal of this alternative is to preserve "natural resource values". It involves a 25% reduction in existing livestock use levels. It also proposes spending \$100,000

Comment Letter 18

Mr. Merrill DeSpain
December 6, 1983
Page 6

- 27 for range improvements, increasing AUMs by 6,086 (\$16.48/AUM), while spending only \$12,000 for habitat improvements, increasing AUMs by 6,442 (\$1.86/AUM). This seems to be significantly out of balance. More money should be spent on habitat improvements in this alternative, which appear to be more economically beneficial anyway.

Page 119 - Item 6

- 29 This item states that grazing systems "may stop the downward trend of the riparian". This lack of commitment to preserving riparian habitat does not seem to be consistent with preserving natural resource values. This alternative should seek to actively improve the riparian areas rather than merely maintaining them. Does this alternative really strive to preserve natural resource values?

Page 136 - Alternative D

- 30 There is no evidence included within the RMP indicating there is enough forage to sustain the AUMs included within this alternative.

Page 138 - Item 6

Over the long term, stream habitat would decrease by more than one condition class.

Page 138 - Wildlife

This alternative would undoubtedly cause more species to be listed as threatened or endangered. This should be discussed in the RMP.

General Comments

The alternatives are analyzed in such a way that the only acceptable alternative is the Preferred Alternative. Redundant alternatives should be eliminated, as there are really only four alternatives: commodity, noncommodity, no livestock, and no action.

Nowhere in the RMP are the costs for implementation of each alternative displayed. For example, to implement Alternative D the BLM would have to ignore Executive Orders and policy regarding riparian/wetland areas, as well as agreements with NDOW regarding reductions in wildlife populations. Legal and policy constraints for each alternative should be included.

- 39 A map showing the zones should be included, along with an explanation of how the zones differ. The explanation on page 60 is not adequate.

- 31 The Improve, Maintain and Custodial categories (I, C and M) should be dropped to only I and M. The M and C categories are close enough that the allotments within them can be lumped together, with a prioritization within the one category for writing of AMPs. Also, the classification system itself appears arbitrary. For example, Black Point and Rock Canyon allotments have five I categories apiece, but are classified as C, while Groux Wash has only two I categories (Range Trend and Investment Return) yet is listed as an I. Category selection and classification of allotments appear to

Comment Letter 18

Mr. Merrill DeSpain
December 6, 1983
Page 7

33

have occurred using range as a guiding factor. This is unreasonable when considering these areas under the natural resources or no livestock alternatives. The categories appear to have been chosen to minimize impacts to livestock operator.

While the general tone of this response may seem negative, we can assure you that our attempt was to conduct an objective review from the wildlife perspective. We hope that you will find our comments and evaluation of the Draft Egan Resource Management Plan to be of value in the development of a final plan which best serves the needs of all resources and resource uses on the public lands within the Egan Resource Area.

We remain available for further input and consultation should you find such to be desirable.

Sincerely,

William A. Molini
William A. Molini
President, Nevada Chapter

WAM:mp

cc: Chairman, Conservation Review Committee
Executive Board
Dan Poole, Wildlife Mgmt. Institute

Comment Letter 19

*Star Route 1, Box 23
Ely, Nevada 89301
December 9, 1983*

*Bureau of Land Management
Egan Resource Area
Star Route 5 Box 1
Ely, Nevada 89301*

Re: Egan Draft Resource Management Plan

Gentlemen:

In reference to zone 3, Cherry Creek allotment No 0403 we would like to make the following comments:

The Cherry Creek allotment has great potential for vegetation improvements. The range should be improved so the ranchers can use the AUMs that have been expanded. We need these AUMs returned in order to make a living as many of our expenses are the same regardless of the number of AUMs we are using.

40 *The wild horses in the Egan seeding and by Goshute Cove should be removed as they have recently come into these areas.*

The map showing the proposed alternative shows a potential land transfer area (residential?) close to our ranch. If this land is sold that close to the ranch it would hamper our ranching activities.

If land is sold, the adjacent land owner should have preference rights to buy the land.

Comment Letter 19

The water in the Cherry Creek Allotment will be impacted the most by the construction of the White Pine Power Plant by the loss of AUMs and the lowering of the water table which will cause springs and sub-irrigated lands to dry up.

Sincerely,
Doreen F. Foppiano
Doreen Foppiano

84

Comment Letter 20

Barbara Kelley
1850 Van Ness Ave.
Reno, NV. 89503

December 11, 1983

Mr. Merrill DeSpain, District Manager
Egan Resource Area
Star Route 5, Box 1
Ely, NV. 89803

Dear Mr. DeSpain,

As your office considers suitability of the four Wilderness Study Areas in the Egan Resource Area for inclusion in the National Wilderness System, I most strongly recommend some changes in your Preferred Alternatives.

1 First, in the Goshute Canyon area, I recommend a total of 28,600 acres in a combination of your Preferred Alternative and you Wilderness Emphasis Alternative. I have hiked this excellent wilderness region with its extremely high wilderness values of solitude and beauty, and am concerned about protection of the Goshute Cave Geological Area, bristlecone pine forest, rare spotted bats, the beautiful Utah Cutthroat trout, and archeological sites. This area also abounds in wildlife.

2 Second, the 57,660 acres in the WSA for the South Egan Range would be an important addition to the Wilderness System. This area is beautiful with its limestone cliffs and forests, it raptors, deer and other wildlife. The Wilderness Study Area eliminates mineral conflicts and it is inexcusable to omit this area from your recommendations as wilderness.

Third, I am pleased to see the Park Range included in your wilderness recommendations. The cliffs and meadows of this area are gorgeous.

3 Finally, I recommend inclusion of all 45,791 acres in the WSA for Riordan's Well, as well as 400 or so acres on the west that were excluded. Riordan's well is an important part of the wilderness areas including Forest Service recommended wilderness and BLM recommended Blue Eagle Mountain wilderness.

The alternative outlined above recommends all four areas be selected for wilderness, for a total of 183,091, less than 5% of the entire Egan Resource Area. This is barely a reasonable balance in the management of public lands for multiple use.

Sincerely,

Barbara Kelley
Barbara Kelley

Comment Letter 21

Peggy Gaudy
900 La Plata Highway
Farmington, New Mexico 87401

Mr. Merrell L. DeSpain
District Manager
Star Route 5, Box 1
Ely, Nevada 89301

Dear Sir:

Thank you for allowing me to comment on the Draft Egan Resource Management Plan/Environmental Impact Statement.

21 I believe that this document does not fully take into account federal policy established under the Federal Land Policy Management Act of 1976 (FLPMA). In particular cultural resources has received minimal attention. The lack of data on possible effects to cultural resources for each alternative does not provide information for the management to select an alternative based on multiple use of the resources. This lack of data is especially evident in Chapter 3 - Affected Environment where ten different resources in the affected environment are discussed and cultural resources is not included. I believe that the final RMP/EIS should include analysis of the effects that the alternatives may have on the known and predicted cultural resources within the Egan Resource Area.

41 On page 44 under Standard Operating Procedures number 27 discusses a protective measure established for the Pony Express Route. I believe that this measure may not be feasible to carry out due to several factors including: if an exploratory well is drilled and oil/gas or geothermal resources are discovered in marketable amounts industry may develop this resource, which would include numerous ground disturbing activities including wells, pipelines, access, rights-of-ways and others; maintenance of existing improvements; and the rights of mine claim holders. The development of claimed minerals would be difficult to prohibit within the half mile buffer zone.

42 On page 41 - 43 under number 4 it should be changed to read: "...every effort will be made to avoid adverse effect," not adverse impacts.

Sincerely,

Peggy Gaudy
Peggy Gaudy

Comment Letter 22



ECOLOGY CENTER OF SOUTHERN CALIFORNIA
Project: Educational Communications, Inc.
P.O. Box 35473, Los Angeles, CA 90012

Telephone (213) 559-9160

December 10, 1983

Mr. Merrill DeSpain
Ely District Manager
United States Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89803

Dear Mr. DeSpain:

As the Ecology Center of Southern California members have expressed to you before, extensive wilderness designation is crucial for the protection of valuable natural areas in our Southwest deserts. Because those of us living in the urban and rural areas of Southern California appreciate the wildness of the United States landscape, we believe that it is your agency's responsibility to designate extensive acreage as part of the National Wilderness System.

Please revise your Environmental Impact Statement so that your Preferred Alternative for the Wilderness Study Areas in the Egan Resource Area includes portions of all sections. Since these areas encompass 236,780 acres of public land which qualified for WSA status on the basis of naturalness, solitude, and/or outstanding primitive recreational opportunities, why not give full protection? Specifically:

- 1 Goshute Canyon Area--needs 28,600 acres to protect its caves, bristlecone pines, rare spotted bats and Utah Cutthroat trout; the limestone cliffs compliment 10,542 foot Exchequer Peak; much wildlife in the Goshute Canyon Natural Area which is part of this Wilderness Area
- 2 South Egan Range--57,660 acres would make a nice addition to save limestone cliffs and white fir forests
- Park Range--46,831 acre BLM recommendation is excellent for this rugged remote area with few resource conflicts; virgin grasslands and meadows are guarded by rugged cliffs
- 3 Riordan's Well--45,791 acres would protect ponderosa pine forests and an important predatory bird raptor area.

Thank you for your consideration of our recommendations. Please add this letter to our other correspondence as part of the public record.

Sincerely yours,
Nancy Sue Pearlman
Nancy Sue Pearlman
Executive Director

NSP:ez

Comment Letter 23

Comment Letter 24



United States
Department of
Agriculture

Forest
Service

Intermountain
Region

324-25th St.
Ogden, UT 84401

Reply to:

Date DEC 15 1983

Mr. Merrill L. DeSpain
Bureau of Land Management
Ely District Ranger
SR 5 Box 1
Ely, NV 89301

Dear Mr. DeSpain:

The Intermountain Region Office and the Humboldt National Forest have completed a review of the Egan Draft Resource Management Plan and Environmental Impact Statement. We wish to commend your staff for the development of a quality document.

The Preferred Alternative appears to provide a balanced approach to resource management. The management of some area resources, however, require a greater coordination by our two agencies than is called for in the document. You may want to recognize these areas and provide specific direction for continued coordination efforts. The major areas requiring coordination are: Schell Creek Elk winter range, Duckwater Wildhorse Management Unit, the Riordan's Well wilderness study area, noxious weed control, and grazing allotments used in conjunction with National Forest lands.

We appreciate the opportunity to review and comment on your EIS.

Richard K. Griswold
RICHARD K. GRISWOLD
Director, Planning and Budget



FS-8200-11b (7/81)

2001 Canta Lomas
El Cajon, California
December 8, 1983

Office of the District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada

Dear Mr. DeSpain:

3 | Your agency if to be commended for wilderness recommendations involving the following areas: Goshute Canyon (28,000 acres) and Park Range (46,831 acres). While Riordan's Well is included in your recommendations, the acreage should be upped to 45,791 acres to allow a suitable range for the large population of birds of prey residing therein.

2 | Sadly your agency did not recommend South Egan for wilderness status. It is a fine area with raptor habitat similar to Riordan's Well. Please reconsider and designate 57,600 acres here as wilderness.

11 | You may wonder why someone from Southern California would bother about wilderness areas far from home which probably will never be personally even seen. I find wilderness protection to be an integral and valuable part of investment for the future. Simply to know these areas are there and protected by our government makes me more willing to pay my taxes. Those areas which I do visit were once applied for in a similar way and I respect my predecessors' efforts in finding them wilderness today and not overrrun by private interursts. That is why I do not favor the selling off of any of the large acreages or disposing of them in any way to the mining consortia.

Sincerely,

Joanna G. Innatowicz
/Ms./ Joanna G. innatowicz

cc Charles Watson

Comment Letter 25

December 14, 1983

Mr. Merrill L. DeSrain
Ely District Manager
SR 5, Box 1
Ely, NV 89301

Dear Mr. DeSrain:

Alternatives B and E seem to be very similar and would seem to be the best of the lot as they are the most protective of our precious wilderness and wildlife values.

What is protected now could be exploited at a later date if we were ever to be in extremis but it is extremely difficult to restore values which have been damaged.

With the present administration which often talks well but is shortsighted and mainly interested in material visible profits wilderness and wildlife interests need all the protection they can obtain to protect the country as a whole.

Yours truly,

Ethel M. Thorniley

Ms. Ethel W. Thorniley
18453 Schenck
Detroit, MI 48228

Comment Letter 26

BOB LANGSENKAMP
P.O. BOX 601
SILVER CITY, NEW MEXICO 88061
(505) 368-4326

*Mr. Merrill L. DeSrain
Ely Dist. Mgr.
RDM*

12/12/83

*Star #46, Box 1
Ely, NV 89303*

Dear Mr. DeSrain:

I would like to recommend the following areas for WSA status for the following reasons:

- 1 - *Shoshone Canyon Area 28,000 acres total. These areas are very scenic. Provide habitats for wilderness dependent species (etc. etc.) or rare species (spotted owl). Have archaeological sites that would benefit by this protection, and offer high values for wilderness recreation, hiking, climbing, birding, spelunking etc.*
- 2 - *South Egan Mtns - 57660 acres. High scenic. High potential for unconfined recreation. Most mineral conflicts would be eliminated or minimized.*

Comment Letter 26

Park Range - 46,831 acres. Designated wild with few resource conflict. Contains pristine meadows + grassland which are very much underrepresented in the system. High potential for scientific study of such areas.

3 *Riordan's Well 45,791 acres. Semi high country. High potential for primitive + unconfined recreation.*

Thank you for your consideration of these comments.

*Sincerely,
Robert M. Langenberg.*

88

Comment Letter 27



THE WILDERNESS SOCIETY

FOUNDED IN 1935

Merrill L. DeSpain
District Manager
SR 5 Box 1
Ely, NV 89301

December 14, 1983

Dear Mr. DeSpain,

The Wilderness Society is pleased with this opportunity to respond to the Draft Environment Impact Statement for the Egan District. Although we endorse the areas recommended for wilderness, we believe these recommendations should be expanded and added to.

Park Range: We fully commend and endorse wilderness designation for the 46,831 acres recommended in the DEIS.

3 Riordan's Well: The BLM report notes that this area has excellent wilderness qualifications: "...a very natural condition...opportunities for solitude are outstanding...good opportunities for hiking (etc.)..." It is within 5 hours driving from a major population center, is an important raptor habitat, and contains many different wildlife and vegetation species. Significant man-made intrusions have already been eliminated from the wilderness boundaries, and the mineral potential does not appear to be truly substantial. Therefore, we urge an increased wilderness designation of 45,791 acres.

2 South Egan Range: This area has excellent wilderness qualities. Among them -- in addition to the opportunities for recreation, solitude, and high degree of naturalness cited by the BLM -- are raptor nests, deer habitat, ancient bristlecone pines, and unique white fir forests. The area is within 5 hours drive from a major population center, and artificial impacts are insignificant. We urge a wilderness designation of 57,660.

1 Goshute Canyon: In view of the extremely high wilderness values in the Canyon, we urge an increase of 6,375 acres over the BLM recommendation. This would restore the area dropped due to mineral potential and increase protection for the rare spotted bats, trout habitat, bristlecone pine, and aboriginal site. It would also preserve the area for the many forms of primitive recreation, the naturalness of the area, the opportunities for solitude, and the outstanding scenery. We urge a recommendation of 28,600 acres.

278 POST STREET, #400, SAN FRANCISCO, CA 94108

(415) 982-8975
2796

Comment Letter 27

Mr. Merrill L. DeSpain
December 14, 1983
Page Two

43

Two issues in particular concern us deeply about the DEIS and Management Plan. The mineral studies conducted by the BLM seem specious, since they rely on the "needle biopsy" method. Since analysis of these samples is not tied to the marketability or strategic reserve value of the minerals, this process appears to be used mainly to discredit wilderness potential in WSAs. It is important, for a fair and reasonable minerals assessment, to carry out sampling for proven resources in surrounding lands as well as the WSAs. A Resource Area-wide analysis is the only way to determine if mineral potential on a WSA is so much greater than the potential on non-WSA lands that wilderness values are out-weighted.

19

Our second concern is with the realty management section of the preferred alternative. We oppose disposing of large blocks of public land to the private sector, especially when the eventual use of this land is so unclear. Since attempts to make these lands commercially and economically productive have so often been ineffective and have exacted great cost from the government and the private investor, we would like to see this program discontinued.

11

Sincerely,

Patricia Hedge
Regional Director, California-Nevada

88

Comment Letter 28

December 17, 1983

Doug Hansen
3050 Covote Creek Rd.
Wolf Creek, OR 97497

Merrill DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89803

Dear Mr. DeSpain:

I am writing in order to comment on the BLM's wilderness recommendations in the Egan Resource Area of the Ely District. Although the Preferred Alternative has one really good wilderness recommendation (Park Range WSA), I believe that one significant area was not recommended, and two that were recommended need to be expanded.

2

The South Egan Range WSA should be recommended because of it's unique and very rare bristlecone pine and white fir forests, as well as it's importance for birds-of-prey and deer.

3

The Riordan's Well WSA should be expanded because it is part of a larger area of de-facto wilderness that includes the Blue Eagle WSA, which is part of an adjacent Resource Area, and land belonging to the Forest Service.

1

The Goshute Canyon WSA needs to be added to because of the many wilderness resources it contains. Among these are a BLM designated Geological Area and a Designated Natural Area, important habitat for many kinds of wildlife, and it's high recreational use.

11

Additionally, I would like to comment on the 80,000 acres the Preferred Alternative proposes to sell. Both Secretary of the Interior Watt and the Executive Branch's Property Review Board have totally withdrawn their support for such large scale land disposal. The 80,000 acres should remain in public hands.

In closing, I would like to point out that with the addition of the new or expanded areas I have mentioned above, the total amount of wilderness in the District would amount to less than 7% of the district's total area. In addition, none of the areas have proven mineral reserves of any type, and in any case, each area recommended for wilderness would have to have a thorough mineral survey done by the U.S.G.S.

Sincerely yours,

Doug Hansen
Doug Hansen

Comment Letter 29

December 19, 1983

Merrill DeSpain
BLM District Manager
Star Route 5, Box 1
Ely, Nevada 89301

Dear Sir:

Should the Liberty Bell be sold for scrap metal?
Should the Yosemite Valley be flooded by a reservoir?
Of course not. These are national treasures.

Likewise, the few remaining unspoiled, unscared
areas of our state are also national treasures that
must be protected for our future generations.

I support all the recommended wilderness areas in
your district. Having visited the Egan and Park
ranges, I am particularly pleased that we have the
opportunity to save these beautiful mountains from
the kind of despoilation seen in so many other of
Nevada's beautiful areas.

Let us protect these few remaining unspoiled areas
in Nevada by designating them wilderness areas.

With best regards,

Brent Boye
Brent Boyer
P.O. Box 414
Reno, Nevada 89504

Comment Letter 30

720 Brookfield Drive
Reno, Nevada 89503
December 17, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89803

Dear Mr. DeSpain:

Thank you for the opportunity to comment on the wilderness
recommendations in the Egan Area Draft Environmental Impact
Statement. I believe that all four of the WSA's have outstanding
wilderness values and should be recommended.

1 | The speculative mineral potential in the Goshute Canyon Area
should not be allowed to override the enormous value of the area
as wilderness. Prime resources are the bristlecone pines, spotted
bats, Goshute Cave, and the Goshute Natural Area. Eliminating
most of the mining conflicts in the southern part of the WSA still
leaves approximately 28,000 acres that qualify for wilderness and
that will represent a unique resource in the national wilderness
system.

2 | The South Egans are also an important wilderness resource with
their limestone cliffs, fir forests, bristlecone pines, and
myriad of caves. The 57,000 acres recommended in the wilderness
emphasis alternative eliminates most mining conflicts and cherry
stem roads and ways and still provides a manageable and large
wilderness area.

3 | Both the Park Range and Riordans Well are truly wild areas
with few resource conflicts. The Park Range has pristine mountain
meadows protected by spectacular rock walls. Riordan's Well is
part of the large Grant Range complex and provides important
habitat for nesting raptors. I support your 47,000 acre recom-
mendation for the Park Range and ask that Riordan's Well be
enlarged to approximately 45,000 acres to include all the
wilderness values.

I particularly appreciate the fine work that was done by your
staff in writing the descriptions of the four WSA's.

Sincerely,

Marjorie Sill
Marjorie Sill

Comment Letter 31



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

PUBLIC INVOLVEMENT DOCUMENTATION SHEET -- VERBAL COMMENTS

EMPLOYEE Ma Lindsey (SE No. _____)
 (if applicable)
 OFFICE Ely, Nevada
 DATE Dec 19 1983
 PROGRAM AND/OR SPECIFIC AREA DISCUSSED Egan Draft Resource Management Plan and F.I.S.
 NAME OF PUBLIC CONTACT Bradley Bradshaw
 ADDRESS OF CONTACT Bradshaw Ranch Duckwater Nev
 INTEREST GROUP (if any) Rancher
 FORM OF INPUT - Telephone Personal visit Meeting
 Other Written Comment

BRIEFLY DESCRIBE INFORMATION RECEIVED OR OPINION EXPRESSED:

40 Wild Horse Herds should be looked at more closely. There's more horses than the count indicates. Ranges should be studied more. I've seen areas where there's too many horses, and there's hardly a enough food for a rabbit left.

Considerations should be looked at for increasing A.M.M.s for ranchers who take good care of their range and not overgraze.

Bradley Bradshaw

Comment Letter 32



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

PUBLIC INVOLVEMENT DOCUMENTATION SHEET -- VERBAL COMMENTS

EMPLOYEE Mr. Lindsey (SE No. _____)
 (if applicable)
 OFFICE Ely, Nevada
 DATE Dec. 19, 1983
 PROGRAM AND/OR SPECIFIC AREA DISCUSSED Egan Draft Resource Management Plan & F.I.S.
 NAME OF PUBLIC CONTACT Barbara Bradshaw
 ADDRESS OF CONTACT Bradshaw Ranch Duckwater NV
 INTEREST GROUP (if any) local rancher
 FORM OF INPUT - Telephone Personal visit Meeting
 Other Written comment

BRIEFLY DESCRIBE INFORMATION RECEIVED OR OPINION EXPRESSED:

40 In regards to the Duckwater Allotment, I agree with categorization indicated in Appendix 3 that indicates this area can benefit from water development and range improvements.

However, I feel that a more realistic look should be taken at the Sand Spring wild horse herd that runs in this allotment. Considering the current budget problems involved in gathering the wild horses I feel the starting herd size should be much smaller, than 300 head. If you start a herd with

Comment Letter 32

40

300 head and don't gather except every 5 or 6 years. The herd size at gathering would be in excess of 2000 head if only 30% of the herd reproduced yearly. This would devastate the range not only for cattle but for the horses themselves, deer, antelope and other wildlife.

Thank you for your help at the question session.

Sincerely
Marilyn Bradshaw

92

Comment Letter 33



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

PUBLIC INVOLVEMENT DOCUMENTATION SHEET -- VERBAL COMMENTS

EMPLOYEE Lindsey (SE No. _____)
(If applicable)

OFFICE Ely, Nevada

DATE December 19, 1983

PROGRAM AND/OR SPECIFIC AREA DISCUSSED Egan Draft Resource Management Plan and E.I.S.

NAME OF PUBLIC CONTACT Mae Bradshaw

ADDRESS OF CONTACT Bradshaw Ranch, Duckwater, Nevada 89314

INTEREST GROUP (if any) Rancher

FORM OF INPUT - Telephone Personal visit Meeting 12/8/83
Other Written Comments

BRIEFLY DESCRIBE INFORMATION RECEIVED OR OPINION EXPRESSED:

WILD HORSE MANAGEMENT

1. Basic herd numbers are too large.
2. More water facilities should be developed to avoid too much concentration in certain areas.
3. Sand Springs Herd: Basic herd should be 50 to 75 head in order to prevent overgrazing by huge numbers before the next gathering and culling. During Summer months most springs dry up leaving only Ike Spring to water the herd. This practice has had a devastating effect on the forage. Scattered year round water facilities should be developed to avoid concentration.
4. Wild horses practically eliminate range conservatiog, especially where rest rotation pastures are needed.

40

RANGE IMPROVEMENT

Seeding potential areas, pasture rotation, water developments, and proper seasonal use should be instituted.

44

FINANCIAL ANALYSIS

Ranching budgets and grazing returns are inaccurate.

45

Thank you,

Mae Bradshaw

Comment Letter 34

REGIONAL PLANNING COMMISSION

of White Pine County

PHONE 289-3261

CITY HALL, ELY, NEVADA 89301

P. O. BOX 622

December 21, 1983

Mr. Merrill L. DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

RE: Egan Draft Resource
Management Plan and
Egan Wilderness Technical
Report

Dear Mr. DeSpain:

The Regional Planning Commission of White Pine County has read and discussed the above documents. A meeting of the Regional Planning Commission was held December 15, 1983. Concerns were expressed by board members on the following items:

1. Seven members of the eight who were present felt that wilderness designation of any kind in White Pine County would endanger and perhaps eliminate the White Pine Power Project. These members opposed wilderness if elimination of the Power Project was the result.
2. Reference was made to the depressed economy in White Pine County. Concerns were expressed by six board members that wilderness designation of any kind would preclude exploration for oil and gas and minerals, etc. A statement was made that a great deal of the State of Nevada is already under Federal control and jurisdiction. It was felt by the board that existing laws and regulations afford adequate protection for undesignated wilderness, scenic and primitive areas under present multiple use practices. It was felt that range management practices as they are presently being followed should be continued. Multiple use in a literal sense should be allowed. Further regulation of the public lands was opposed by six of the eight members present.

Comment Letter 34

We have ten members on the RPC Board. One member, Vice Chairman Joyce Haskew, was unable to attend but submitted written comments, which were read into the minutes of the meeting. Six members voted to oppose any wilderness designations in or near White Pine County; one member favored wilderness use, however was opposed to any designation which would endanger the White Pine Power Project. The eighth member abstained from comment for he is employed by the Bureau of Land Management.

I personally contacted Ron Beale of the Employment Security Department and was informed that the November unemployment rate is 15.6% for White Pine County. In my opinion this does not represent a true picture of unemployment in White Pine County. There are many discouraged workers who have quit looking or who have moved from the area. Any wilderness designation will tend to limit potential economic development essential to the welfare of White Pine County Residents.

Sincerely,

Nancy M. Swallow
Nancy M. Swallow, Chairman
Regional Planning Commission

NMS/jh

cc: White Pine County, Board of County Commissioners
White Pine County District Attorney
City of Ely

93

46

4

4

Comment Letter 35



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

720 Brookfield Drive
Reno, Nevada 89503
December 19, 1983

Merrill DeSpain
Ely District Manager
Star Route 5, Box 1
Ely, Nevada 89803

Dear Mr. DeSpain:

Thank you for the opportunity to comment on the Egan Draft Resource Management Plan and EIS. Comments on the four WSA's will be submitted under separate cover by Roger Scholl, Wilderness Coordinator, and additional comments on grazing will be made by Rose Strickland, Public Lands Coordinator. In this statement, I shall address three issues: riparian habitat, public land disposal, and seedings.

Riparian habitat has been a great concern of the Toiyabe Chapter for sever years, because of the effect on both wildlife and recreation. Unfortunately, in the Egan area almost one-half of the riparian areas are in unsatisfactory condition, according to your statistics, and none of your management actions will have a short-time effect on this condition. What use is intensifying monitoring efforts when you already know where the problems exist? Fencing the riparian areas where the greatest deterioration has occurred is the only logical solution since the principal cause of riparian deterioration is concentrations of cattle. Areas that have been fenced show enormous improvement in even two or three years.

We are extremely concerned that the preferred alternative proposes to dispose of 79,888 acres of public land and that even Alternative B proposes to dispose of 39,555 acres. There seems to be no good reason for such wholesale land disposal. Selling small amounts of land for civic purposes is reasonable, but in general public lands should be retained or traded for environmentally sensitive lands. We also question the seeding of areas with non-native crested wheat grass which can lead to such problems as insect infestation. We suggest instead that you seed with a mixture of native grasses which have long-term advantages.

Sincerely,
Marjorie Sill
Marjorie Sill
Conservation Chair GREAT BASIN GROUP

LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

To explore, enjoy, and protect the wild places of the earth...

P.O. Box 8096
University Station
Reno, Nevada 89507

Comment Letter 36

December 20, 1983

Dear Mr. DeSpain,

PLEASE SUPPORT THE CONSERVATIONISTS
ALTERNATIVE WHICH INCLUDES GOSHUTE CANYON,
THE 46,531 ACRES OF THE PARK RANCH, THE
45,791 ALTERNATIVE OF RIGGOLD'S WELL, AND
THE ADDITION OF THE SOUTH LOAN RANCH, 57,660
ACRES FOR WILDERNESS DESIGNATION.
THANK YOU VERY MUCH.

1
2
3

Sincerely,

STEVEN THAYER
Box 2788
STATELINE, NEVADA
89449

94

Comment Letter 37

December 20, 1983
Lund Town Council

Dear Sirs:

On the 9th of November 1983, the Lund Town Council held a community meeting at which the proposed wilderness area classification of the South Egan Range was discussed. Those in attendance unanimously expressed opposition to the proposed reclassification and encouraged the town council to draft a letter expressing this feeling. This letter is in response to that request.

The Community feels that the proposed change would be considering the desires and wishes of a chosen few, (many of which are not even familiar with this area) while the majorities viewpoint is ignored. We therefore, proposed that the South Egan Range remain "as-is" with no changes being made.

Sincerely,

Lund Town Council

Laine Hendrix
Arthur Griffin
M. Wayne Parice

48

95

Comment Letter 38

Menill de Spain
District Mgr. - B.L.M.
Ely District

Dear Menill:

The following are my comments concerning wilderness recommendations for the Egan Resource Area:

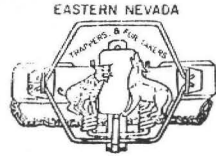
- 1) Goshute Canyon -- The outstanding characteristics of this special area are well known and well documented. I support the entire 35,594 acre area for wilderness. Additionally, you should develop a "wilderness enhancement" alternative. This has been done successfully in Wyoming. Such an alternative would expand the area north & west beyond the defunct "Indian Creek Way", and include the high ridges at the head of Goshute Creek; it also ^{with} close down the so-called "Paris Canyon road". I am interested in protecting complete drainage systems; unfortunately this area has been dissected. I haven't given up on protecting an expanded Goshute Canyon area -- but apparently you have.
- 2) South Egan Range -- I support the 57,660 acre "wilderness emphasis" alternative for this rugged and beautiful area.
- 3) Park Range -- Your preferred alternative recommendation for this area is very good. Don't back down from this proposal.
- 3) Riordan's Well -- I support wilderness for the entire area of 57,000 acres. This area is a vital component of the Grant Range wilderness complex, and should be recommended in full.

Thank you,

Bert Koehler
Consultant for
Nevada Wilderness Assoc.

Comment Letter 39

Comment Letter 39



EASTERN NEVADA TRAPPERS & FURTAKERS, ASSOC.

P.O. BOX 1304 — MCGILL, NV 89318

December 22, 1983

Mr. Merrill DeSpain
 District Manager
 Bureau of Land Management
 S.R. 5, Box 1
 Ely, NV 89301

Dear Mr. DeSpain:

These comments are in response to the Egan Resource Area Management Plan and Environmental Impact Statement. The following comments represent the Eastern Nevada Trappers and Furtakers Associations response to this document. Our association is based in White Pine County, Nevada and made up of informed, concerned, and active conservationists, many of which have lived in the area and Nevada most of their lives. They know the Egan Resource Area and the various opportunities it provides recreationists very well.

It should be noted that the user group we represent have historically made the most use in the Egan proposed wilderness areas. Traditionally trappers have always tried to protect and preserve the wilderness characteristics of our Nevada ranges along with other state sportsmen groups. Were it not for these users concern, many of those areas considered suitable as per BLM evaluations, may not have been so.

Our association has determined that the preferred alternative is the best alternative of those presented in the Egan RMP Summary. We are mainly concerned with any current access routes being closed. Since this has been taken into account by the BLM and existing roads into wilderness areas will continue to allow access to public uses, we support the proposed alternative. However, we support prevention of future access ways into these locations.

49 | Again our support for the proposed alternative is based on assurances that hunting and trapping users have always been compatible within these areas prior to wilderness designation, and these activities will continue to be allowed there.

40 | We feel comfortable with the BLM's handling of the livestock use in the Egan Resource Area. However, we are concerned that the Feral Horse populations are, and will continue to have, significant adverse impacts to the resource. These animals should be reduced to far lower numbers, and managed in such a way as to keep the population down.

2

They have the potential to far more adversely effect the wilderness area's and the resource area at large, than most other users which are much more closely controlled.

We appreciate your extending to us the opportunity to comment on this EIS. We hope you'll consider our input, and continue to keep the association appraised on the progress of your actions on these matters.

Sincerely yours,

Craig Marich, Secretary
 Eastern Nevada Trappers and Furtakers Assoc.
 Box 1304
 McGill, Nevada 89318

96

Comment Letter 40

John R. Swanson
P.O. Box 922
Berkeley, Calif. 94701

December 15, 1983

Egan Resource Area - Bureau of Land Management
Ely, Nevada 89301.

Dear Sirs;

Please accept my comments, as follows, concerning =
*Egan Draft Resource Management Plan and Environmental
Impact Statement

I have been acquainted with this area of Nevada for nearly a half-century and certainly agree that this - now - Egan Resource Area features certain outstanding Wilderness, scenic, wildlife, botanic and cultural resources of particular national interest.

As it contains significant national natural heritage lands; areas that provide a lasting refuge for all Life, including Man, on this decimated planet.

The purpose of Each Unit of all of our Public Lands; local, State and Federal, is to Preserve each such unit. So, then, establish each and every Public Lands Unit into a lasting Preserve. To permanently preserve such units, Wilderness, scenic, wildlife, fish, botanic and cultural resources.

Each Preserve to protect, strengthen and expand Wilderness, preserve watersheds, protect ecosystems, save and enhance wildlife - fish and their respective habitats, protect and to promote biological diversity and to restore - recover - all used - damaged areas back to their respective natural environmental condition.

To accept that Wilderness is the foundation of all Land-Water Resources. With the primary goal of all land-water resources planning and management to protect, strengthen and expand Wilderness.

1.2.3 I Urge that the following areas - acreages located on this Egan Resource Area - Only - Bureau of Land Management administered areas - only - receive permanent Wilderness classification, at this time;

50 | *Park Range 54,217. *Goshute Canyon 41,426.
*Riordan's Well 65,103. *Mount Grafton 85,362.
*South Egan Range 114,849. *Central Egan Range 52,807.

51 | *Plus, to add to this - above - acreages - areas some (at least) 385,000 Acres located on this Egan Resource Area - Only -; lands administered - only - by the Bureau of Land Management.

Comment Letter 40

2

51 |

To total (at least) about 805,000 acres and to be added to our National Wilderness Preservation System representing only Bureau of Land Management administered areas - Egan Resource Area.

To establish this Resource Area as the Egan National Land Preserve.

To Ban - permanently - all forms of surface and sub-surface development on all current, proposed and potential Wilderness, including, Roadless Areas - Wilderness Study Areas. With No Release of any Roadless - Wilderness Study Areas; as they are to be added as Wilderness.

11 |

To acquire all Inholdings on all Public Lands, With No Disposal of any Public Lands.

To eliminate the use of all Off-Road Vehicles.

And to adopt, permanently, Alternative P - for Preservation - as the management plan and program for this Egan Resource Area.

For when we save our natural lands and waters - including Wilderness - we save America!

Sincerely,

J. R. Swanson

(This letter was retyped by the BLM since the original could not be reduced in size without being illegible.)

Comment Letter 41



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca 94105

Merrill L. DeSpain
District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89301

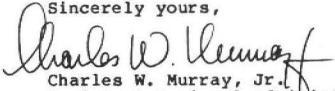
DEC 19 1983

Dear Mr. DeSpain:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled EGAN RESOURCE MANAGEMENT PLAN. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2 (lack of objections - more information needed). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Enclosure (1)

Comment Letter 41

Water Quality Comments

52

The FEIS should provide a basis for the statement on page 91 that impacts to ground and surface water are not considered significant and will not be discussed further. The impacts from grazing to surface water can be significant due to erosion and sedimentation. Water quality and beneficial uses should be protected through effective implementation of the range management practices presented.

Comment Letter 42

Brent Eldridge, Chairman
J. Kendall Jones, M.D., Vice Chairman
Archie Robison, Member
Jay Henrod, Member
Wayne Cameron, Member

P.O. Box 1002
(702) 289-8841

Board of County Commissioners

WHITE PINE COUNTY
ELY, NEVADA 89301
December 21, 1983

Mr. Merrill Despain, District Manager
Ely District Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. ^{Merrill} Despain:

Our Board has reviewed the Draft Egan RMP and EIS and offers the following comments.

We note a letter to you from Mr. Eldon Cotton, Project Manager for White Pine Power Project, dated November 10, 1983, which points out the potential impacts to that project should various alternatives in the RMP be chosen. We favor the preferred alternative, but with the following reservations:

1. That Mr. Cottons' concerns are satisfied, assuring reasonable clearance for White Pine Power Project. Both the Egan and White Pine Power Project DEIS's should agree upon the alternatives for utility corridors and construction sites, and should also address the impact of wilderness designation upon air quality in general upon White Pine Power Project operation in particular.

2. That wilderness designation for Goshute Creek area not be recommended. Our Board has submitted a resolution previously which opposes wilderness designation anywhere in White Pine County because of its potential for adversely affecting our fragile economy. A Goshute Creek wilderness area could, we fear, spell the demise of White Pine Power Project at the preferred North Steptoe site. It could also impact likewise any other emitting industry which might settle in Steptoe Valley, as well as mining and agriculture.

Your approach to planning for the Egan R. A. is appreciated, and we feel that the monitoring program you propose for measuring the effects of forage utilization is good. Except as noted above, we support your preferred alternative.

We thank you and your staff for the presentations given us and for your other efforts to keep us informed.

Sincerely,

Brent

BRENT ELDRIDGE
Chairman

BE/rw

Comment Letter 43

12-20-83

To Merrill L Despain:

I don't really have the time to go page by page in the EIS Egan Range. But I do have a few comments.

1. I don't want to lose any acres in the course of the EIS because of outside influence.
2. I don't want wilderness area to hinder this area.

3. On page 181. Rock canyon management goal is C which means that all that is going to be done is being done. In fact Rock Canyon area has 3 different areas which are all excellent places to put in a reservoir. There is nothing there but black brush and I know that crested wheat is more productive. This needs to be reclassified to could improve.

4. The North Cove says the trend is down, the trend since five years around (30yr) is on the improve and the old times will in force that fact. The cattle come off this allotment after the winter fat.

5. The cattle camp allotment trend is downward. This is not true there is more feed over there than there has ever been. The cattle come off this ^{summer} range fat.

The studies I think are taken near the roads and water holes and don't represent the range as a whole.

6. All of my allotments would be ~~for~~ favorable to improvements of some kind. Sorrenson - Big Six North Cove + Dec Grove Springs & should not be cut out of that classification!!!

Comment Letter 43

Comment Letter 43

To Merrill L. DeSpain.

48

I am opposed to the designation of South Egan Range as a wilderness area because:

53

1. My Rock Canyon allotment is 41% in this area. There is a high potential for development of this grazing resource and if made into a wilderness area would make improvements prohibitive. I drive my pickup & equipment out onto this area all the time and there are roads allow it.

2. Our drive trails are in this wilderness area.

Maintenance of these trails are essential

3. Our summer range is in the Cattle Camp Allotment. There are no wilderness characteristics out in the grazing allotments. Also ^{making} improvements would become impossible.

4. The reports say there are a lot of wild life in the area, but I have never seen any more than a jack rabbit or a wood deer.

54

5. It stated on page 94, that there will be no curtailment of grazing rights but if water developments need improving and I can't get to the project and becomes uneconomical to repair, grazing will be curtailed for that area.

55

6. Page 97 says there will be increase cost of operation. An regulatory constraints

7. We don't need more federal control we need less. Multiple use is the way we need to proceed. Historic use of wood and tree products is a way of life and will not & should not be changed. The top of the mountain has wilderness characteristics and will never change regardless of the designation.

8. On page 99 it says that there will be a loss of additional forage due to the preclusion of some vegetative manipulation projects. It also goes on to say that there will be restrictions on range improvement projects. We need less restrictions.

56

9. In forcing this area would almost be impossible. There would be a lot of undue harassment to citizens of this area who have always got wood and Christmas trees out of there and always will continue (page 105). This will cause a socialistic police state.

54

10. On page 106 it says maintenance of the chaining & seeding would be allowed but cost could be higher than a non wilderness area. I'm opposed to this.

57

11. Page 106 No new range developments have been proposed. Rock canyon area has some of the greatest potential for seeding and resource development. I should not be cut out because of some wilderness area.

48

I strongly oppose making the South Egan Range a wilderness area or any other for that fact. The numerous coupon letters that are sent in, the people don't know what the country is like and should have little influence of the decision. There is enough areas for selection for all. We don't have to protect these areas from ourselves.

Thank you for your consideration

Steven Carter
65W New Holland Rd
Lund, Nevada
89317

Comment Letter 44

Mr. Merrill L. DeSpain
 Ely District Manager B.L.M.
 S.R. 5, Box 1
 Ely, Nevada 89301

Dear Mr. DeSpain:

Thank you for mailing me the Draft Egan Resource Management Plan and Environmental Impact Statement. In general I liked the manner in which the different values were treated, and felt that much of the bias I had encountered in earlier statements had been eliminated. However, I still do not favor the Preferred Alternative but would like to lend my support to Alternative B, which says a more reasonable treatment to all the multiple use values, balancing those of the U.S. Public at large against those of local vested interests. I somewhat favored Alternative E, but believe that its implementation would be very hard to achieve. If Alternative E, the elimination of livestock grazing from public lands --an alternative entirely possible since the land is public--were to be accomplished, then some alternative program should be funded for those livestock operators who would be forced out of business due to the action. Such an alternative program was not mentioned; and, so widespread discontent would result. Although I dare say that the naive Indian who had a life-style distinct from that of the white was given no such kental consideration when the white largely displaced him and his way of life from the land which was his birthright.

The following are my specific comments to the Draft:
 p. 7. Alternative E. Social Analysis: This is said to be a significantly adverse impact and it is true that it would stir things up quite a bit, yet I wonder whether its end result would not be better for the majority of the U.S. citizens, for it would mean that they would have to face up to the harsh reality of what public livestock overgrazing is doing to our marginal desert lands. Perhaps if they faced up now and such a drastic measure as Alt. E was taken, a better way of life would emerge and catastrophe would be averted. This would require a government with considerable foresight, however, and the means to accomplish this change by developing new and imaginative lifestyles.

Ch. I: Planning Issues and Criteria.
 Purpose and Need: 3rd P., beginning: I disagree with the overall purpose of the resource management planning process as stated: "to improve the resources of the resource area which would result in increased goods and services to the public land users and general public." This overlooks the goal of the preservation of inherent natural values, and discounts them as being of little or no value. Too often it is only after such existing non-money producing values are gone that we realize their overriding value both to society and in and of themselves.
 3rd P., ending: There needs to be a well-thought out and long-term balance between multiple-use and sustained yield and the ecological, etc., values, so that use does not become abuse and some expression of the native ecosystem itself is allowed to manifest itself.
 p. 12. Setting: 2nd P: Tourism indicates the importance of the area to the general public. Often this is greatly underestimated for no tally is kept of all the visitors to the area or the vicarious appreciation that the public feel for it. This value should not be underestimated in its importance for it affects the very quality of human life.

101

Comment Letter 44

Owner-2

Criteria Upon Which The Selection of the Preferred Alternative and Planning Decisions Will Be Based
 P. 13, 2nd P: You should mention the preserving of values or qualities rather than speaking only of uses.

4th P: Good.
 P. 14: Criteria Guiding the Development of Alternatives.
 1st P: Protection Parameter: I favor this statement as set forth. I think the natural values such as wilderness, wild horses, and wildlife --and the former is a part of the latter--should outweigh in importance the livestock usage of the land. This would be fairer to all the people of the United States.

58 |

I disfavor the Development Parameter...In general I favor the protection parameter in the Wilderness Designation and other use aspects.
 P. 15. ORV: There is a great need to restrict ORV's in the desert environment. Mineral Resources Management: There is a great need to address the environmental impact of mining activity upon the desert ecosystems.

Ch. 2. Alternatives.
 Of the 6 presented I favor Alternative B. I think it is a fairer balance among the various uses and values represented in the Egan Resource Area. And, although I am partial to E, I think it would prove unrealistic at this time.

11 |

Preferred Alternative:
 Realty Management: I object to the disposal of so much public land in the 5 zones and believe it would be better to leave the land in public hands in most--but not all--cases.

1 |

Wilderness Study Areas
 P. 24. a. Goshute Canyon: Too much acreage has been deleted here. This would be a detriment of the integrity of the wilderness area. Furthermore, many of the spoiling factors would be erased with time and wilderness qualities restored, if the areas were declared as wilderness.

59 |

d. South Egan Range. I find the exclusion of this area unacceptable. This is a splendid area. Most of the objections you mention could be overcome were the area declared wilderness for the same reason mentioned under Goshute Canyon.

40 |

P. 26. Alt. B: I do not agree with managing the wild horse herds at their 1982-83 levels, as these are far short of those which would result from the horses natural place in the desert ecosystem. I think that maintaining them at this level would result in a wild horse population that is frustrated in its attempts to come to terms with its environment and fill a vacant niche which exists for it in the Egan Resource Area as elsewhere in Nevada and for which it is preadapted (referring to the long prehistory of equids in North America).

11 |

P. 27. 6. I approve of the plan for wild fires...some fire should be allowed to burn in order to renovate the land and allow for a greater variety of habitat types and therefore niches for a greater variety of organisms.

7. I also agree with the reintroduction of antelope into their historic ranges and to the reintroduction of elk--but for this to occur the reduction of livestock grazing would certainly have to be more than a "paper tiger."
 Realty Management: I favor not disposing of land in "wildlife habitat or in a wild horse herd management area" but by wildlife do you only mean game species? Also, you should look with an eye to the potential wildlife habitat of these various areas. --Certainly all land is potential wildlife habitat for these various areas, when allowed to its own course. The question is: where would it have the best chance to continue in largest units of continuity and with the greatest degree of habitat diversity.

Comment Letter 44

P. 27. Wilderness Study Areas: I very much favor the designation of all 4 WSU's in their entirety. These 4 are already greatly reduced from those originally possible and should be declared in their entirety in order to adequately represent the wilderness value and all the various desert habitat types. (I am especially upset by the elimination of the South Egan Range from the preferred alternative.)

11

P. 30: Realty Management. I object to the disposal of this much land. Alt. D.

P. 32: Management Action

2. There are too many vegetative conversions.
4. Cutting the wild horse herd back to such a low level is not at all acceptable to me. This is not a fair representation of the wild horse population on public lands.

P. 33. Long-Term Actions

3. This is not fair multiple-use, but is dominant livestock use.
P. 34. WSU's in Gonshute Canyon: This is a beautiful area with exceptional solitude which should be protected as wilderness, not dropped from consideration.

1

Alternative E

Management Action

60

6. You say prescribed burns would enhance wildlife and wild horse habitats-- but my question is which wildlife? Many non-game species thrive in bushy or forest habitat, i.e. owls, song birds, and depend on the pinyon nut and other food sources here. These deserve equal consideration.

P. 36. Realty Management

1. How is it known that these lands are not in wildlife habitat? Again are we considering only game animals?
Wilderness Study Areas: I am very much in favor of designating these 4 "SA's" in their entirety. There are only a small fraction of the total resource area and deserve further study. Enough will be dropped by the time Congress gets around to declaring Nevada's wilderness, without major surgery at the initial stage.

P. 38. Wild Horses

61

How will the 1971 herd areas be determined. I hope not simply by talking to ranchers. Also, I would like to know how the wild horses can be both free and restricted to these herd areas. If they are free then they are distributing their grazing pressure more equitably. Do you allow the wild horses to shift their distribution over time according to their nomadic life style.

P. 39. Selective Management

62

To what extent are these judgements of current satisfactory or unsatisfactory arbitrary and what are the long-term trends?
P. 43. 9. I favor the exception of riparian areas from vegetative conversion.

P. 44. I protest the use of vegetative conversion requiring herbicides, which can have major detrimental impact on many organisms in the desert community.

Ch. 3. Affected Environment

Wildlife. P. 61. Mule Deer. Nevada's Dept. of Wildlife's bucks only hunting upsets the stability of the deer population, killing off the fittest male members of the population, resulting in increased productivity each year, but little long term stability and co-adaptiveness of the population to its environment.

P. 62. Bighorn Sheep. These animals contract disease from domestic sheep, which should be lessened or excluded from areas of bighorn introduction.

Comment Letter 44

Aquatics. P. 64. It is important to protect the White River Speckled Dace and Mountain Sucker, remnant native fish that show much about adaptation to the high desert. Strict measures are needed to assure their survival. Wild Horses. P. 66. This competition between wild horses on the one hand and wildlife and livestock on the other is misleading as stated. The wild horse is wildlife, adapting to the natural scene. The livestock are set out on the range and artificially propped up by man. They are the chief problem in Nevada's desert ecology.

The problems that the wild horses will face in the future can be circumvented by proper actions in the present, and by enforcement of regulations and assurance of watering rights and unrestricted movement. I recommend the BLM's using trade-off agreements to effect this. After all, it is a privilege for livestock to graze on the public lands whereas the wild horses have a right to do so.

Wilderness. P. 70. Large contiguous areas of wilderness preservation are important for the preservation of life communities intact.

P. 72. Social Analysis.

Since the Egan Resource area is 85% public land, the entire U.S. public should have a proportionate say in what happens to this land.

P. 73. There are other more important values at stake here than mere beef. The meat industry is already causing serious health and ecological problems and habitat destruction right in our own country and on a world scale.

P. Livestock Grazing is a privilege not a "right."

I would also oppose this massive sell-off of public lands.

P. 74. The local citizens should also have some regard for the natural value at stake here. "Traditional Nevada antipathy" for the federal government and the wilderness program is true for vested interests, but not necessarily for the majority of Nevadans, nor Americans.

Ch. 4. Environmental Consequences.

Introduction. P. 91. It is an oversight to think that the environmental impacts to air quality, soil, and ground and surface water are not considered to be significant. Even the maintenance of the level of livestock grazing as proposed in the preferred alternative will continue to aggravate a worsening condition of water depletion and soil erosion. Much of the dust that is blown off the desert ends up in the high atmosphere, where it definitely does affect the air quality--and on a world scale!

36,52

58

P. 93. Are you sure that little damage is occurring from OHV's? I doubt it. Determination of significant impacts. The resource specialist should not be influenced by public opinion when it comes to judging trends and impacts to desert ecology.

The 10% figure for judging significant impact seems arbitrary, but is at least consistent for most of your categories.

P. 94. Wild Horses: For a herd, I would recommend more like 100 as the minimum level--and even this would be too small, in my opinion.

P. 95. Economics. The percentage figures here are smaller than for other natural values. I think instead of accepting the status quo lifestyles, the government should attempt to develop alternative lifestyles which would be more compatible with the other desert qualities here.

Visual Resources: I approve of your criteria for Visual Resources.

PREFERRED ALTERNATIVE: Wild horses and wildlife should benefit in the same proportion as livestock from any range improvement. But be careful you do not overlook vital components of the desert ecosystem which may not thrive with these "improvements."

P. 98-99. Wild Horses: Very important to preserve distinctive characteristics by preserving the stallions and the breeding mares. It is not acceptable to me that herd viability would decline.

I would like to know how you know just how few wild horses are

Comment Letter 44

Comment Letter 44

103

63

injured, including all those that are chased and may become lame and go off in the desert to suffer or die. I have seen these escapees, or survivors, limping along, scared out of their wits by a recent BLM helicopter roundup.

2

P. 101. Wilderness. This proposed reduction is excessive since the wilderness areas are already small enough before being further reduced.
P. 102. The dropping of the Egan WSA is certainly an oversight due to the area's vastness, natural solitude and wilderness characteristics.
Conclusion. I agree that a significant adverse impact is incurred by dropping the Egan WSA.

64

P. 102-3. Minerals and Energy. I really doubt that in the overview the loss of these WSAs from mining would be significant to the industry which has access to the large majority of public lands already -- and more than enough to exploit.
P. 103. Social Analysis. The view by ranchers that the wild horses are causing the destruction of public range lands is erroneous; rather, it is their own livestock which have been causing this!
P. 104. Public values would suffer due to this commercialization. Wilderness visitors would create wholesome recreation in Nevada and improve the state's image.

65

P. 105. Realty Mgmt. There is a large discrepancy here between sale value and assessed value and this should not be tolerated by the U.S. taxpayer.
P. 111. Wildhorses. 6. How would the BLM insure that the distinctive characteristics would not disappear after the roundups? This is not at all clear to me.
P. 112. Wilderness. It is absolutely unacceptable that no wilderness WSAs would be declared.

16

P. 113. Social Analysis. Wild horse population levels are minor and degradation of habitat is the result of too many livestock.
Alt. B.
P. 119. Wild Horses. 1. The BLM must assure that the wild horses receive an equitable portion of these increased AUM's.
3 & 4. Is there a contradiction here? How can wild horses be free-ranging and remain confined to the arbitrarily imposed 1971 herd use areas? And how does this set with the ecological health of the life community?

61

P. 120. 6. If this wild horse gathering is random, then how can you be sure of this outcome? What is your method of selection?
Realty Mgmt. 1. I favor this low rate of realty disposal but object to the overall amount. Also, is 39,553 acres to be a ceiling?
2/P. 121. Utility industry should try to minimize corridor areas and use these to the maximum degree necessary.

11

Social Analysis
P. 123. Cultural heritage in wilderness. Yes, indeed, this would uphold a long tradition of naturalism, stemming from Thoreau and even the Indians. Ref. Paul Brooks, 1983. Speaking For Nature, Sierra Club, S.F.
Last P. The individuals who use the area see their use as a right to act without considering the consequences; really, they guard their right to destroy.
P. 124. Economic Analysis. The few would have to look elsewhere for livelihood or develop a more compatible livelihood in this area, so that the many would benefit.
Alt. C.
P. 130. The wild horses' numbers should actually increase if the multiple-use concept is fairly applied.
P. 133. Social Analysis. This indicates that the BLM is catering to locals and is not adequately representing the public interest--which is the nation at large!

Alternative. D. P. 136. Vegetation: This further deterioration of vegetation is unacceptable and at the root of many of the problems here.
P. 137. I find it unacceptable that present livestock use would increase above preference and that wild horse herd viability would be lost (p. 138) and characteristics eliminated (p. 139).
P. 139. Realty management. Unplanned expansion would lead to serious social problems in the future similar to those of the 3rd world!
P. 140. I object strenuously to the wholesale dropping of WSAs and acreages, especially flagrant in the case of Goshute WSA.
Alternative E. Many undesirable elements here, including the concentration of use around waterholes, favoring of big game over other species, etc.
P. 145. Wildlife. Wild horse reducing competition for bitterbrush indicates a complementarity between mule deer and wild horses.
2. Big game... This will also be a better use of the land, i.e. more meat possibly harvested while at the same time preserving the ecological balance.
P. 146. Wild Horses. The 1982-3 level is still artificially low and not in accord with the wild horses' natural place in the ecosystem.
P. 147. Wilderness. I greatly favor the inclusion of all 4 WSAs in their entirety.
P. 148. Minerals and Energy. I doubt that mineral development would be so adversely affected due to the large portion of public lands already open for such.
P. 149. Social Analysis. Perhaps the elimination of livestock grazing would be best in the end, bringing a needed change. But sound alternative lifestyles should be worked out before so that a new and better way of life could emerge. More political support is needed for this truly revolutionary move.
Livestock Grazing. Ranch wealth would decline but greater values than money are at stake here.
P. 151. 4th P. A relatively small number of large scale ranchers hold the majority of AUM's -- about 1/4 of these account for a substantial majority of the state's AUM's!
Forestry. This could prove very profitable in the long term if well managed and done in moderation.
P. 152. Irreversible Commitment of Resources. Are concessions to development in balance with concessions to preservation and in accordance with the long-term public interest--meaning all the people in the U.S.? Irretrievable Commitment of Resources.
3. Mining Activities have and will continue to scar the land unless checked. There is a need to change the antiquated Mining Law of 1879 (?).
7. The loss of a ranch could be a positive gain if the people could evolve a sound alternative, perhaps incorporating such of the ranching life style, but getting away from dependence on destructive overgrazing and fencing and disruption of the freedom of life on the land.
Short-Term VS Long-Term Productivity.
P. 153. 3. There is too much emphasis on productivity in the BLM's management program. You need also to mention such qualities as diversity, stability, balance, and complementarity among the various elements of the ecosystem.

CLOSING: Again, I appreciate this opportunity to review your Draft Management Plan for the Egan Resource Area and hope that my suggestions and comments have been of some help to you. Please keep me informed of the progress of this and other plans.

Sincerely,
Craig C. Downer
Craig C. Downer, M.S., P.O. Box 456 Minden, Nevada 89423

Comment Letter 45

Sierra Pacific Power Company

December 19, 1983

Mr. Merrill L. DeSpain, Manager
Ely District
Bureau of Land Management
SR 5, Box 1
Ely, Nevada 89301

Re: BLM Egan Draft Resource Management Plan and
Environmental Impact Statement

Dear Mr. DeSpain:

Thank you for the opportunity to comment on the Draft Egan
RMP and EIS. BLM Ely District, Egan Resource Area is to be
congratulated for its multiple use planning efforts. The iden-
tification of the corridor issue and subsequent designation of
corridors in the Draft RMP are in keeping with the intent of the
Federal Land Policy and Management Act of 1976 (FLPMA).

Sierra Pacific Power Company supports the Realty Management
Action in the "Preferred Alternative" subject to the clarifica-
tion and resolution of areas of concern outlined in this letter.

The following are areas of concern that Seirra Pacific feels
need to be clarified and resolved:

1. a) Draft RMP/EIS Quote:

Chapter 2 - Alternatives - Implementation - UTILITY
CORRIDORS - page 38

"Utility corridors which include existing
transmission lines will be designated....The actual
route will be established after environmental analy-
sis is completed for the right-of-way....Applicants
for use of a corridor will be required to locate new
facilities proximate to existing facilities except
where considerations of construction feasibility,
cost, resource protection or safety are overriding."

b) Problem:

Sierra Pacific feels that compatibility and reli-
ability should be included when exempting the loca-
tion of new facilities proximate to existing
facilities. Example: Natural Gas pipelines are not
necessarily compatible with electric transmission
lines because of possible electric induction in the
pipeline. Reliability deals with electric system
designs, outages caused by natural occurrences (i.e.,
fire, earthquakes, slides, etc.), and man-caused
occurrences (i.e., airplane accidents, etc.).

P. O. BOX 10100/RENO, NEVADA 89520/ TELEPHONE 702/789-4011



104

Comment Letter 45

Mr. Merrill L. DeSpain
December 19, 1983
Page 2

c) Solution:

Sierra Pacific recommends the following language
change:

33

"Utility corridors which include existing
transmission lines will be designated....Applicants
for use of a corridor will be required to locate new
facilities proximate to existing facilities except
where considerations of construction feasibility,
cost, compatibility, reliability, resource protection
or safety are overriding."

See Map entitled "Lands and Wilderness - Preferred
Alternative - 1983"

b) Problem:

The preferred alternative states (page 23) that there
are to be two designated corridors and three planned
corridors. However, the preferred alternative map
does not differentiate between designated and planned
corridors.

Also, the corridor traversing north through Butte
Valley ends at the northern boundary of the Egan
Resource Area and is not picked up by the adjacent
Wells Resource Area. Essentially, this is a useless
corridor to industry. Inter-district and inter-state
consistency in resource management plans are essen-
tial components to corridor planning.

66

Also, the South Egan Range (NV-040-168) wilderness
study area is not graphically shown on this map.

c) Solution:

Sierra Pacific recommends that the above-referenced
map be changed to graphically differentiate between
designated and planned corridors. Also, graphically
show the South Egan Range wilderness study area on
the map.

The Butte Valley corridor should be resolved by the
Elko and Ely BLM Districts. There obviously was some
rationale in the land use planning phase for this
corridor. Sierra Pacific is definitely concerned
over the consistency of the resource management
plans.

Comment Letter 45

Mr. Merrill L. DeSpain
December 19, 1983
Page 3

33

3. a) Draft RMP/EIS Quote: None
b) Problem:

Sierra Pacific believes the "Western Regional Corridor Study" should be included in the reference section of the RMP/EIS document. This study is the basis for corridor planning in the eleven Western States.

- c) Solution:


Add to Reference Section:

Western Utility Group 1980 Western Regional Corridor Study

We hope that our comments and concerns will be addressed in the Final Egan RMP/EIS.

If you have any questions, please call Stephen Younkin at (702) 789-4747.

Sincerely,


Michael P. Sullivan
Manager - Environmental Affairs
And Right-of-Way Acquisition

MPS/SPY/jc

cc: Ed Spang - BLM Director - Nevada
Stu Gearhart - BLM - Reno

Comment Letter 46

Atlantic Richfield Company 555 Seventeenth Street
Denver, Colorado 80202
Telephone 303 293 7577

J. R. Mitchell
Manager
Public Lands Coordination
Government Relations

December 20, 1983

Mr. Merrill L. De Spain
Ely District Manager
SR 5 Box 1
Ely, Nevada 89301

Re: Draft Resource Management Plan/
Environmental Impact Statement
Egan Resource Area, Nevada

Dear Mr. De Spain:

Please accept the following comments on the Draft Resource Management Plan and Environmental Impact Statement for the Egan Resource Area in Nevada.

Goshute Canyon (NV-040-015)

We disagree with the proposed suitability for wilderness of 22,225 acres in this area especially 10,300 acres in the middle third of this WSA.

67 There is high, not moderate, potential for precious and base metals including gold, silver, and lead. The Cherry Creek Range is a major mining district and a prime target for additional discoveries. The "limited number of mining claims" should not be construed as an indication of low mineral interest or potential.

1 We propose declaring the entire WSA as unsuitable for wilderness, or at the very least, moving the wilderness southern boundary north to the Goshute Creek so areas of mineral and geothermal potential remain open to exploration and development.

Riordan's Well (NV-040-166)

We disagree with the proposed suitability for wilderness of the 37,540 acres in this area especially the 1,230 acres of moderate mineral potential on the southern side of Heath Canyon.

68 Mining interest in this area is not slight. The Troy Mining District, including the Terrell Tungsten Mine, is within one mile of the WSA. Neither the tungsten mines or the surrounding areas have been fully



Comment Letter 46

Mr. Merrill L. De Spain
December 20, 1983
Page 2

explored, but this does not indicate the lack of mineral interest or potential. In addition, there are oil and gas leases and mining claims throughout the proposed wilderness area.

We propose declaring the entire WSA as unsuitable for wilderness based on its geologic favorability for gold, silver, zeolites and salts or at the very least moving the western boundary east so as to open up the area of moderate mineral potential south of Heath Canyon to multiple use that will encourage exploration and development.

South Egan (NV-040-168)

We agree with the proposed unsuitability of this entire WSA based on its energy and mineral potential.

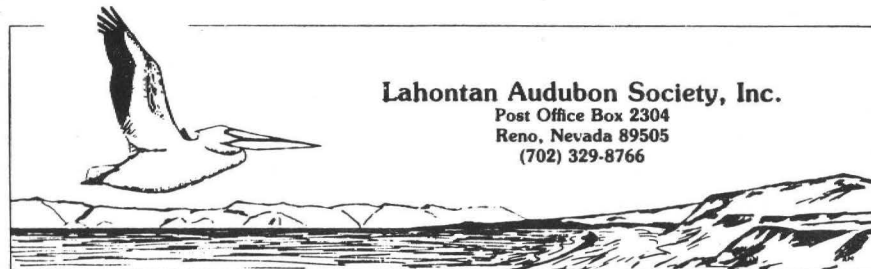
We appreciate the opportunity to comment on the Draft Plan for the Egan Resource Area.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

Comment Letter 47



Lahontan Audubon Society, Inc.
Post Office Box 2304
Reno, Nevada 89505
(702) 329-8766

December 21, 1983

Merrill L. DeSpain
District Manager
S. R. 5 Box 1
Ely, Nevada 89301

Re: Egan Resource Management Plan

Dear Mr. DeSpain:

The Plan and EIS fail to address the possible impacts of the White Pine Power Project. While it is acknowledged that not all possible projects can be addressed, and a separate EIS is being prepared on WPPP, there should be some acknowledgement of impacts on Goshute Canyon WSA, wetlands and other resources.

Generally we support the objective and management actions of Alternative B, specifically the protection and enhancement of natural resources values and wildlife. The limited wetlands available within the Egan Resource Area must be managed for wildlife values regardless of which alternative is selected.

For wilderness study areas included in the Egan Resource Area, we recommend the following:

- A. Park Range - We concur with the preferred alternative.

Comment Letter 47

2-

3

B. Hordans Well - We concur with the wilderness emphasis alternative in that the boundries should form a managable unit and boundries should be easily identifiable.

2

C. South Egan Range - We feel that the EIS and technical report write-up are prejudiced against wilderness. The variety extent and significance of the special features contribute to the importance of this WSA. We recommend the wilderness emphasis alternative.

1

D. Goshute Canyon - We would recommend that all of the WSA be found suitable for wilderness, but as a compromise, we could settle for the preferred alternative area.

11

With the change in the Administrations emphasis on land disposal, and with the declared policy of Congress (second sentence of FLPMA) "that the public lands be retained in Federal ownership", we ask that you reevaluate the lands disposal proposals in the plan, and retain all lands in a public use concept, available to all the people.

Sincerely

Janet C. Meierdierck

Janet C. Meierdierck
President
Lahontan Audubon Society

Comment Letter 48

The undersigned are totally opposed to ANY form of Wilderness designation to be made by the BLM within the Egan District of Eastern Nevada.

We appreciate any and all help you can give on our behalf before December 30, 1983.

- 1 *Maeycella Mueney 1927 "ADDRESS" ST. Sparks Nv*
- 2 *John James 858 BEVING N14 #3.*
- 3 *Robert C. Hillier 1408 12th St. Sparks Nv*
- 4 *Madam President 4765 Mayberry Road*
- 5 *John Hillier 4765 Mayberry Road Sparks Nv*
- 6 *John Hillier 4765 Mayberry Road Sparks Nv*
- 7 *John Hillier 5874 Mayberry Road Sparks Nv*
- 8 *John Hillier 5874 Mayberry Road Sparks Nv*
- 9 *David Spence 734 C. Hawthorn*
- 10 *John O'Mara " "*
- 11 *Lily Clark 275 Diamond Circle Sun Valley Nv*
- 12 *Ronald MATHIER BK 304 LEE VINING CA*
- 13 *Rick Niles Box 262 Lee Vining Ca.*
- 14 _____
- 15 _____
- 16 Several of these petitions were received with a total of 119 signatures.
- 17 _____
- 18 _____
- 19 _____
- 20 _____
- 21 _____
- 22 _____
- 23 _____
- 24 _____
- 25 _____
- 26 _____
- 27 _____

Comment Letter 49

Comment Letter 50

800 Compton
Ely, NV 89301
Dec. 22, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5 Box 1
Ely, NV 89301

Dear Mr. DeSpain,

This letter is in protest of , NV-040-015 WSA,
Goshute Canyon Wilderness Area designation

I believe the south end of this WSA area does
have mineral potential. Improvement in precious metal
prices as well as new recovery processes have
brought about a change in criteria for determination
of ore body potential, during the past several years

As a former Cherry Creek resident, with mining
claims spanning the past thirty-five years, I feel
the interests of the people in the area, would best
be served by maintaining this area at its present
level of use.

Sincerely,
Curt C. Ruggles

69

Gentlemen:

12 22 83

I feel all ~~disturb~~^{areas} under
consideration for wilderness in
Elyon District to be unsuitable.

Wally Culbert
72512003
Reno NV 89510

Comment Letter 51

Dear Mr. DeSpain,
I wish to comment on the BLM Wilderness
Review of the Ely District Egan Resource
Area. I want you to know that I support
the proposal prepared by the Nevada
environmental groups coalition. I believe
that this proposal will preserve the most
beautiful and significant BLM lands.
Thank you.
Sincerely,
MP Boyser

Comment Letter 52

21 Dec 1983

Merrill DeSpain, Mgr.
Ely District, BLM
Star Rt. 5, Box 1
Ely NV 89803

Subject: Wilderness Proposals, Egan Resource Area

Dear Mr. DeSpain:

In considering the question of wilderness I believe the BLM is obligated to consider the question of "balance". In considering the balance of a wilderness proposal it is necessary to remember that the wilderness values of most of the public lands have already been destroyed. The hand of man rests very heavily on the West, on Nevada, and on the Ely District. This lack of balance in the current situation probably can't be changed. It certainly must be considered by the BLM in establishing wilderness recommendations. Even if you recommended as wilderness every roadless acre in the district you would still have a balance tipped against natural values. This lack of balance in the current situation mandates wilderness recommendations unless you are faced with overwhelming conflict unresolvable without development. Such a situation is not established for the Egan Resource Area.

Wilderness recommendation is thus the most balanced recommendation possible unless you are willing to recommend that roads be closed and natural values be restored to lands now developed. Even Wilderness recommendation represents a loss of natural value to development. This bias to development is the result of the BLM's Wilderness Management Policy which seems to protect natural values only if it is not inconvenient to the needs of man. But, discussion of the Wilderness Management policy is relevant here only in that the accommodations to development found in that policy render absurd any statement that a Wilderness Recommendation exacts an uncompensated "cost" from users of the public lands. In fact, one could administer as Wilderness a majority of the District without exacting any costs except those needed to respect the long term needs of the land. Since it is not possible to ignore or escape those "costs" they should not be a factor in a wilderness decision.

My comments on your proposal are made in the context on your need to achieve a balance of values as explained above.

Comment Letter 52

2

1) In the South Egan Range you should look to and adopt the Wilderness Emphasis Alternative. The wilderness and natural values are clearly shown in the inventory. This area should be protected, and can be protected without serious conflict.

3

2) In the Riordan's Well area one finds important natural values. Since the conflicts are insignificant I suggest your recommendation for wilderness be expanded by 8,000 acres.

1

3) Your recommendation for the Goshute Canyon area appears to be heavily influenced by speculation about possible mineral potential. The Wilderness and natural values are real. They exist now. They are not speculation. They are fragile and perishable. Your wilderness recommendation for this area should be at least 28,000 acres.

4) Congratulations! Your proposal for the Park Range shows respect and recognition for the unique accomplishment represented by that area. Any grassland area that can survive 100 years of "stewardship" by the cattle industry deserves a chance to continue. Legislative designation as wilderness would only be legislative acknowledgement of what nature herself has done; create a remote pristine area inaccessible to the benefits of human attention. I support your proposal.

Thank you for the opportunity to comment on your wilderness recommendations.

Charles C. Yoder
Charles C. Yoder
1238 Camelot
Boise, Idaho 83704

110

Comment Letter 53

Nov 20, 1983

Marcel ReSpain, District Manager
Sta. Route 1
Box 1
Ely, Nevada 89803

Dear Mr. ReSpain,

As a resident of Nevada concerned about the preservation of Nevada's wilderness areas, I should like to voice my support for the wilderness areas proposed within the Egan Resource Area by BLM.

I support and highly recommend BLM's decision to include Park Range, Riordan's Well, and Goshute Canyon in their Preferred Alternative proposal. I feel however that acreages in the latter two areas should be expanded. For Goshute Canyon, I endorse a combination of Preferred Alternative and Wilderness Alternative which will expand that area to 28,000 acres. This will better ensure protection of the resource

1

Comment Letter 53

Comment Letter 53

in some places, some rare/unique outcrops, and unique geologic formations.

3

I also support an increase in acreage for the Washan Well area, from 37,572 to 40,741 (as stated in the wilderness Alternative), plus 400 acres on its western side.

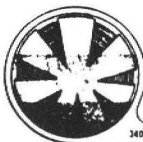
2

Lately I should like to recommend an additional area to the Preferred Alternative in the Egan Wilderness Area. The South Egan Range (57,600 acres) should also be included because of locations of Miocene pine and unusual geologic formations (see Angel Cave).

I support inclusion of all four areas above for designation to

wilderness status. The total area includes 187,091 acres, representing 45% of the Egan River area, and will adequately protect the wilderness of the Egan River area, while accommodating other land uses. Thank you for your attention.

Your sincerely,
Ralph Dennis Smith



**RESOURCE
CONCEPTS
INC.**
ENGINEERING • ECONOMICS
RESOURCE PLANNING

340 N. MINNESOTA ST. • CARSON CITY, NEVADA 89701 • (702) 883-1900

December 22, 1983

Merrill DeSpain
District Manager
Star Route 5, Box 1
Ely, Nevada 89301

SUBJECT: N-4 State Grazing Board Comments to Egan Draft Resource Management Plan

Dear Mr. DeSpain:

Resource Concepts, Inc. (RCI) submits the following comments to the Egan Draft Resource Management Plan (RMP) on behalf of the N-4 State Grazing Board. The N-4 State Grazing Board is well aware that the RMP represents a planning document as opposed to a record of decision. However, the RMP is an "action forcing device" and serves as the basis for making future decisions affecting the livestock industry in the Egan Resource Area. Therefore, it is essential that the RMP objectively evaluate the existing environment and accurately portray the consequences of the various alternatives if implemented. The Board does not consider the Draft RMP as being entirely objective nor accurate in its analysis. In addition, there are several points critical to the future of livestock grazing within the resource area which either have not been addressed or which need further clarification.

Please give all due consideration to the following comments. The N-4 State Grazing Board would appreciate an answer to each specific question and a response to our recommendations.

THREE YEAR AVERAGE USE

The Preferred Alternative states "Initially authorize livestock use at the three year average licensed use....". Page 106 describes the economic impacts resulting from limiting the permittee to the three-year average use and the losses associated with loan and sale values from the reduction of preference levels. The RMP gives every indication that the Bureau fully intends to hold the permittees to their previous three year licensed use. The Board has expressed its concern with this issue during the Schell

Merrill DeSpain
December 22, 1983
Page 2

EIS process, through the Board's consultant, and at several additional meetings, apparently to no avail. The Board has received conflicting responses from the Bureau concerning whether the three-year average license use will be the required starting point or if it is for "analysis purposes only". This issue has generated a great deal of controversy in the past, yet the Bureau has made no attempt to resolve the issue. Resource Concepts, Inc., representing the N-4 State Grazing Board, provided the following comment during the initial stages of the Egan RMP process (correspondence dated April 28, 1983): "Is the three-year average use for livestock for analysis purposes only? If so, it should be stated as such. This issue raised considerable controversy during the Schell EIS."

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Question: Is the three year average licensed livestock use for analysis purposes only, or does the Bureau fully intend to dictate the exact numbers of livestock to graze the Egan Resource Area?

Recommendation: If the Bureau has used the three year average use figure for "analysis purposes only", the Board recommends that a statement to this effect be included with each appropriate alternative. In addition, the following statement taken from the Final Reno EIS, should be included under the "Specific Implementation Procedure" section of the RMP:

"The three year average use was used for analysis only and would not, or could not, be required as a stocking rate. Any permittee is free to activate his non-use at any time unless emergency conditions such as fire or flood were to preclude it. There is no basis to hold a permittee to the past three years active use, as this could be a reduction in preference and would require a District Manager decision with resultant appeal rights. There, of course, is no correlation between active use and proper stocking rate, and without proper data a reduction in preference would not stand up in court."

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Question: If the Bureau intends to hold a permittee to his previous three years' average use, what bearing does the previously presented excerpt from the BLM in the Final Reno EIS have on this matter?

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Question: If the three year average licensed use is for analysis purposes only, how will the initial "starting point" be determined?

If the Bureau actually intends to hold the permittee to the previous three year's licensed use, the Board adamantly opposes this recommendation. The Board's concerns have been adequately expressed on this point in the Schell Final EIS, which included the following:

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 3

Paul Bottari, Secretary of the Nevada Cattlemen's Association: "One of our major concerns with the proposed action is the proposal to use the average AIM use between 1977-79 as the present use. Using this average will unfairly reduce permits that took voluntary non-use during this period."

Dave Eldridge, Permittee: "To force affected livestock operators to take reductions based solely on three previous years use is unfair. This action will have an adverse impact on any operator who, for whatever reason, has taken voluntary non-use of a portion of his licensed AUMs during 1977 through 1979. This proposed action should be deleted in favor of continuing the current system, until such time as monitoring data indicates a change in AUM levels are warranted."

Kenneth D. Lee, Lincoln County Conservation District: "Our most serious reservation is relative to the establishment of beginning livestock AUMs. We cannot understand why the numbers begin at a figure that does not have any bearing on the resource base. Using average grazing of the 77-79 grazing season has very little relationship to range productivity. Actual use, in most cases, is mostly dictated by the economic status of the permittees or the cattle industry at the time."

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Question: Will the Bureau be responsive to the type of concerns expressed by the N-4 State Grazing Board, Mr. Bottari, Mr. Eldridge, and Mr. Lee, or will the Ely BLM continue to blatantly ignore legitimate concerns which effect the economic well-being of every operator in the Egan R.A.?

Furthermore, the Board is confused as to why the Bureau considers it necessary to have a set stocking rate during the initial monitoring period. Since horse numbers will increase, big game numbers will fluctuate, and forage production may vary dramatically, it seems of little value to hold only one consumptive use static during the initial monitoring period. Good range management is a product of wise management decisions which allow flexibility to voluntarily adjust stocking rates to reflect the needs of a resource base. This proposal by the BLM removes the opportunity for judgement which is critical to improving rangelands.

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Question: Why do the Egan BLM personnel consider the continuation of the present system (allow the licensing up to active preference levels) during the monitoring period as unsuitable for monitoring purposes during the short term?

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 4

NO GRAZING ALTERNATIVE

Sections 1601.5-5, Title 43 and 1502.14, Title 40 of the CFR indicate that the RMP alternatives must be "reasonable". The N-4 State Grazing Board is appalled that the Egan R.A. personnel consider No Grazing as a reasonable alternative. The RMP (p.37) states "The final plan may consist of one of the alternatives presented in this document or it may be a combination of several of the alternatives." Therefore, the Board must assume that there is a definite possibility that the "No Grazing Alternative" could be selected by the BLM as the final plan.

In order for the "No Grazing Alternative" to have a "reasonable" chance of implementation, the Bureau would require extensive valid data to justify the closing the range to livestock grazing. Within the Egan R.A., the Board is unaware of any data which could support a "No Grazing Alternative". Without such data a closure of the range to livestock would be contrary to FLPMA, the Taylor Grazing Act, and the Bureau's own Final Grazing Management Policy. BLM Director Burford has stated that a major goal of the Grazing Management Policy is to "Authorize livestock grazing of the public rangelands under the principles of multiple use and sustained yield." Livestock grazing of public lands is a legitimate multiple use.

If the No Grazing Alternative was selected and proposed for implementation, FLPMA requires that this decision receive Congressional review and approval. The Board seriously doubts that the BLM could produce data to convince Congress that closure to livestock within the Egan R.A. is warranted.

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Question: Does the Egan Resource Area personnel contend that they presently have data to support implementation of a "No Grazing Alternative"? If not, how can the BLM possibly meet the NEPA mandate of selecting and evaluating reasonable alternatives?

The Heno EIS states, "An alternative considered but eliminated from study was No Livestock Grazing. This alternative was eliminated because it was considered to be unreasonable and unrealistic per Nevada Instruction Memorandum NV-82-81". The Shoshone-Eureka RMP states "A no livestock grazing alternative was considered initially and then eliminated from further study.... As existing laws recognize livestock grazing as a valid use of the public lands, and given the impracticality of this alternative, it will not be considered further."

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Question: Why is the "No Grazing Alternative" considered reasonable in the Ely District, but not in other BLM Districts?

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 5

Possibly the purpose of the No Grazing Alternative was to provide a range in livestock AUMs among the alternatives. The Board contends that a range in livestock use among the alternatives is adequately portrayed by Alternatives B and D. The Board can see no useful purpose for a No Grazing Alternative in the Egan RMP, does not consider it a "reasonable" alternative, and feels this alternative unnecessarily threatens the livestock industry within the Ely District.

13| Recommendation: The Board recommends that the "No Grazing Alternative" be eliminated from the RMP because it is not "reasonable".

ALTERNATIVE A (NO ACTION)

The objective of Alternative A (No Action) is to "continue to manage the public land as at present". As portrayed in the RMP, if the No Action Alternative is selected as the final RMP, rangelands will deteriorate, increased over utilization of forage will result, and competition between wild horses, livestock, and wildlife will become severe. The Board contends that if the Bureau ascribes to this type of management (or lack of management), they are clearly in violation of their own mandate, PLPMA, the Wild Horse and Burro Act, BLM Policy, etc. Since the implementation of this alternative would be illegal, it must be assumed that Egan RMP's No Action Alternative is not a "reasonable" alternative. NEPA requires that all alternatives analyzed must be reasonable. However, NEPA also requires that a "No Action" Alternative be included in the RMP. Based on this discussion, there is a paradox: there must be a No Action Alternative, but the alternative must be reasonable. The N-4 State Grazing Board contends that this "paradox" is not the result of NEPA regulations. The problem pertains to the manner in which the Bureau has portrayed the No Action Alternative.

30| Question: Would the implementation of Alternative A, as portrayed in the RMP, be illegal?

At this point in the RMP process, the Bureau does not know which alternative or combinations of alternatives will be selected as the final RMP (p.37). As a result, it must be assumed that the "Implementation of the RMP" section of the document would apply to all of the alternatives. However, there are a number of contradictions between the guidelines presented under the Implementation Section of the RMP (which is supposedly applicable to all alternatives) and the No Action Alternative. The following is a summary of these contradictions:

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 6

	Implementation of RMP	No Action Alternative
1) AMPs	(p.37) The RMP will be implemented through activity plans such as AMPs, etc.	(p.108) The allotments would stay as they currently are without AMPs and associated grazing systems.
2) SELECTIVE MANAGEMENT	(p.39) It is the policy of the BLM to address rangeland management problems through a selective management approach.	Indications are that selective management will not apply to the No Action Alternative.
3) GRAZING ADJUSTMENTS	(p.37) Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies,	(p.25) Rangeland monitoring of grazing use for proper utilization and trend would continue. For analysis purposes it is assumed that no adjustments would be made on the basis of monitoring data.
4) RESOURCE CONFLICTS	(p.37) The management actions developed for these plans will be integrated into a total management program designed to assure progress towards meeting the objectives of the RMP.	(p.109) No action would be taken to reduce the competition for available forage among livestock, wild horses, and wildlife.

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 7

30 | Question: If Alternative A is selected as the final RMP, how will the guidelines for implementation be incorporated?

33 | Question: Page 40 states that the monitoring program will be incorporated into all of the alternatives except the No Action alternative. Page 25 states that the monitoring of rangelands for utilization and trend will continue under the No Action Alternative. Which statement is correct?

According to the BLM's Final Grazing Management Policy, the selective management approach should be included under all alternatives. The policy states "District Managers will develop a proposed action and an array of alternatives for each planning area and analyze them through the land-use plan and RIS. The alternatives, as well as the proposed action, should incorporate the features of selective management, including varying the level of inventory..." However, the indications are that selective management will not be a part of the "No Action Alternative".

71 | Question: Why has the Egan Resource Area elected to go contrary to the BLM Director's Final Grazing Management Policy concerning selective management categorization?

The Board agrees that heavy continuous utilization during the critical growing season can result in deteriorating range conditions. The Board does not agree with the Bureau's insinuations on page 108 of the No Action Alternative that this problem is occurring on a large scale within the Egan Resource Area. Page 108 implies that the entire resource area is experiencing heavy utilization and deteriorating range conditions. This is not an accurate portrayal of the existing conditions.

72 | Question: Does the Egan Resource Area possess sound technical data to support the contention that overuse and deteriorating range conditions are occurring throughout the entire Resource Area?

Recommendation: The Bureau should include qualifying statements under the discussion of vegetation on page 108 such as "in some areas of the management zone there may continue to be overutilization".

Page 108 implies that significant adverse impacts to vegetation are the result of "existing livestock management practices", "heavy stocking rates", etc. However, there is no mention that wild horses are causing similar problems.

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 8

33 | Question: Why was there no discussion of wild horse use during the critical growing season and wild horse overuse of key forage species included in the Vegetation Section on page 108?

The Bureau speculates that the limiting factor of the Egan Resource Area big game herds is the availability of forage and that the two major variables affecting the amount of forage available to big game are livestock numbers and wild horse numbers. During recent years, deer numbers have continued to increase (for the most part) within the resource area. The Bureau again speculates that if livestock and wild horse forage demand remains the same, deer numbers will significantly decrease.

73 | Question: Why will currently increasing deer numbers decline in the future due to over utilization of forage if livestock and horse numbers remain constant? We fail to see the logic in this line of reasoning.

RANGELAND MONITORING PROGRAM

Page 40 of the RMP indicates that the Egan Resource Area staff has implemented monitoring studies according to the 1981 Range Studies Task Group monitoring procedures. In Instruction Memorandum No. NV-82-96, the State Director requires these methods "as the minimum standardized procedures and methodologies". The memo also states, "In all cases, when developing your monitoring program, the range user and affected interests must be actively involved in the establishment, reading, and evaluation of the studies. Involvement of this type is an essential part of the CHMP process and is as integral to the success of your monitoring program as the technical adequacy of the methods employed."

74 | Question: The 1981 Range Studies Task Group monitoring procedures state "Utilization Map. The use map is our most important tool, and unfortunately, the most often overlooked." Has the Egan Resource Area range staff conducted annual utilization mapping on their allotments since the State Director's 1982 directive?

75 | Question: What percent of the studies were established and read with the permittee "actively involved" as per NV-82-96 and on what percent of the Egan R.A. allotments?

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 9

ADEQUATE DATA

The RMP gives no indication as to the amount of "professional judgement" used, to what extent data was extrapolated to other areas, and to what degree actual study results were utilized in formulating the RMP document. Without knowing the details, the quality, or reliability of the data, it is difficult for the reviewer to make an adequate evaluation of the Alternatives. Section 1502.22 of NEPA indicates that when there are gaps in the relevant information or scientific uncertainty, the agency shall always make clear that such information is lacking or that uncertainty exists. In addition, Section 1502.24 states the agency "shall identify any methodologies used".

76 | Question: To what extent was data extrapolated to other areas? How was data extrapolated to other areas (methodologies used)? Does the Bureau have any "uncertainties" associated with use of extrapolated data, if used?

As presented on page 20 of the RMP, the Bureau insinuates that overutilization of forage is common to the entire area for 4 of the 5 management zones. The Board contends that it is impossible for all the forage of all the allotments within Management Zones 1,2,3, and 4 to have been overutilized. The Bureau unfortunately has misled the public on this issue and failed to present an accurate portrayal of the real management situation within these zones.

42 | Question: Would the Bureau be receptive to altering their statements concerning the overuse of all forage within the various management zones (p.20) if data was presented to the contrary?

Recommendations: The Board recommends that the Bureau:

1) Change on page 20, the appropriate statements to read, "...indicate that forage demand may exceed current forage production in some areas...of the management zone."

75 | 2) Include a table in the appendix which designates the numbers of utilization studies and their results by allotment for the Egan Resource Area. This table should also indicate if the permittee was involved in the studies site selection and the field utilization evaluations. The percent of the acreages, by utilization class (slight, moderate, heavy, etc.), delineated on the utilization maps (assumed to have been performed if 1981 RSTG recommendations have been followed) by allotment, should also be

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 10

included in this table. If these results indicate that the entire areas represented by Management Zones 1,2,3, and 4 have been overutilized, the Board will retract its comments concerning doubtful nature of the statements presented on page 20.

76 | 3) The RMP should state the methodologies used in determining riparian condition, how the percent of total area of each existing successional stage by management zone was calculated (Appendix 5), how and what type of data was extrapolated, and what degree of certainty the Bureau has in its results.

RIPARIAN

Appendix 7 indicates that livestock grazing is a conflict on the majority of the stream/riparian areas within the resource area. The data presented in the appendix and the criteria used (p.20) confuses "livestock use" with "livestock damage". "Conflict" is a term denoting incompatibility. Proper livestock use of riparian areas is compatible, while livestock overuse is incompatible.

33 | Question: Why is livestock grazing considered a conflict in Appendix 7 on riparian areas that are in "excellent" or "good" condition?

77 | Question: Does this condition evaluation method account for natural erosion?

33 | Question: Does the Egan R.A. range staff agree that "use" is synonymous with "damage" (as portrayed on page 200)?

33 | Question: Why is wild horse use not presented as a conflict in Appendix 7?

78 | Question: The criteria presented on page 200 is entitled "Riparian Condition Classes for Streambanks and Shorelines". Appendix 7 presents the total acres of riparian habitat by stream and implies that the condition rating applies to the total riparian area. Does the Bureau feel confident that a condition evaluation of "Streambanks and Shorelines" can be extrapolated to represent the entire riparian area?

25 | Question: What is the difference between "summer miles" and "winter miles" of streams?

79 | Question: Which criteria were used in determining habitat condition in Appendix 7: the criteria on page 200, or Appendix 8?

A correspondence from Resource Concepts, Inc., (representing the N-4 State Grazing board) to Howard Hedrick, dated April 28, 1983, stated the following:

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 11

"HCI recommends that the BLM exercise caution when interpreting the riparian condition rating results, and that the reasons for a less than good rating be presented and explained, (i.e., undesirable pool to riffle ratio, poor bank cover, etc.), and that the BLM describe its riparian habitat evaluation methodology in the RMP."

80 | Question: Why did the Egan R.A. staff choose not to include Resource Concepts, Inc., recommendations in the RMP?

There are a variety of problems associated with the Bureau's riparian methodology. The BLM's methods for riparian condition rating are:

1) are influenced by stream flows. For example: the pool-to-riffle ratio for a stream will change between seasonal and annual flows. Therefore, the results of the condition rating will vary without an "actual" change in riparian condition.

2) are more accurately termed "fisheries habitat condition" than "riparian condition". The methods result in evaluation of only the streambed, stream channel, and banks. They do not reflect the status of the adjacent riparian vegetation. It is not justified to apply a "fisheries habitat" rating on riparian vegetation.

3) have no relationship to site potential.

The Board contends that the Bureau must explain the limitations in interpreting the data in the RMP and should reassess their own interpretations of the results. Not to do so is misleading to the public.

29 | Question: The RMP indicates that riparian fencing may be necessary if other management actions are not accomplishing riparian habitat goals. The Board assumes that riparian fencing will not occur until grazing systems and/or AMPs have been implemented and evaluated after a complete cycle and monitoring data indicates that fencing is needed. Is the Board's assumption correct?

Recommendation: The Board has the following recommendations:

33 | 1) Under "Aquatics" on page 63, the RMP should read "Appendix 7" instead of "Appendix 8".

117

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 12

2) Appendix 8 should provide a detailed description of the methodologies, the drawbacks of the methods, and the need for caution when attributing the impacts to grazing. Appendix 9 should include the reason for a less than satisfactory condition rating (pool-to-riffle ratio, bank stability, etc.).

3) The criteria on page 200 should differentiate between use and damage. The Bureau should reevaluate the conflicts column in Appendix 7. Specifically, if livestock use should be considered a conflict as opposed to livestock overuse.

WOODLAND

On page 21, under Management Objectives Rationale, the BLM states that, "The primary method of conversion will be through prescribed burning, but under some circumstances may also include chaining, plowing, and application of other herbicides."

While energy conservation is presently of concern throughout the country, it seems that the BLM would feel somewhat compelled to explore "Biomass" harvest opportunities for energy purposes. Identifying plant life, whether shrubs or trees, for removal by burning is, in our opinion, wasteful, if the resource is not first evaluated for its potential for commercial harvest. Offering large designated acreages for commercial harvest could potentially, with good planning, result in improved range conditions for wildlife, livestock, and watershed protection; job opportunities and an improved economic base in many rural communities; limited costs to the BLM and users for range improvement.

Information in the form of technical and economic reports were provided to the Ely BLM by HCI over the past several months to alert the Bureau to current technologies and opportunities potentially available in the Ely area through large scale harvesting of pinyon-juniper woodlands. The Bureau apparently does not feel that investigating new opportunities with the P-J woodlands, etc., which could benefit all users, plus local economies, is worth the effort.

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 13

ECONOMIC ANALYSIS

Page 76 states that total estimated net ranch income in the area for 1980 was approximately \$2.4 million and that average net ranch income per AUM is estimated at \$11.36. Previous studies completed by Resource Concepts, Inc., within the area do not indicate as high net ranch incomes as reported in the DEIS for Egan area ranches (Resource Concepts, Inc., 1981).

45 | Question: What is the basis and data used in deriving these estimates of net ranch income?

Recommendation: Because levels of economic impact to livestock operators is a critical factor to be considered in evaluation and selection of management options, accurate base data is essential to analyses of these impacts. Clarification of the income levels reported in the DEIS and documentation of data sources is suggested and requested.

Page 77 of the DEIS appears to imply that "consumer surplus" related to the use of public lands grazing is derived only from economic benefits to ranchers from the use of those public lands. The DEIS fails to recognize that "consumer surplus" associated with public land use is often more a function of private investment on both public and related private lands than economic benefits derived by ranchers from the use of public lands.

Comments by Dr. Brian Melton, Agricultural Economist and principal of Consolidated Management Services (Roslyn, New Mexico) at a recent meeting of the Public Lands Council Grazing Fee Task Force suggest that grazing permit values are in fact falling as a result of low beef prices, higher costs of production, and a growing risk and uncertainty associated with grazing public lands.

81 | Question: Will the Bureau of Land Management utilize potentially outdated AUM costs from 1980 in reaching management decisions in 1984?

Recommendation: If the Bureau of Land Management feels compelled to stress the perceived "imbalance" between grazing fees and permit values, a discussion regarding the importance and levels of private investment and risk, which are required of the rancher to harvest a Bureau of Land Management administered AUM, is appropriate and should be researched and included in the Final EIS.

118

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 14

Page 97 of the DEIS states that "Added costs to livestock operators would occur because of wilderness designation".

82 | Question: As wilderness designation benefits will accrue primarily to recreationists, why should a livestock operator need to incur higher costs? Would it not be equitable for the BLM, acting on behalf of the non-paying recreationists, to incur these additional costs?

Recommendation: Added range improvement development and maintenance costs attributable to wilderness designations will be easily quantified. Because these benefits will accrue to recreationists, we would recommend that wilderness area users, their special interest representatives, or the public (via the BLM) pay any added costs associated with range improvements in wilderness areas.

None of the discussions of economic impact associated with the various alternatives (pp. 114-151) addresses the added costs of production that will occur after 1984 as all rangeland improvement maintenance costs and a higher share of development costs are shifted to permittees.

83 | Question: Has the BLM considered the ability of permittees to share in development costs and incur full maintenance costs for new range improvements proposed to improve vegetative conditions throughout the area?

Recommendation: The eventual success of any of the alternatives presented in the DEIS in accomplishing its intended objectives will depend heavily upon development of new and/or maintenance of existing range improvements. Because the Rangeland Improvement Policy will effectively shift the major costs of new improvements and maintenance of existing ones to the livestock industry, the industry's ability to incur these additional costs must be considered. The Final EIS should include an analysis of the livestock industry's ability to finance in whole or in part the range improvements proposed under each alternative.

Further, because the Rangeland Improvement Policy directs that primary beneficiaries (51 percent or greater) of range improvements will bear the cost of maintenance, the question of how maintenance will occur under Alternative E should be addressed. Where will the funding come from? Under NEPA it is doubtful that selection of any management approach can be completed until the EIS is expanded to address these questions.

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 15

Page 106 of the DEIS indicates that rancher equity will be reduced by as much as \$4.0 million. This reduction in equity will undoubtedly cause the debt/equity ratios of many operations (as figured by lenders) to fall below acceptable levels. The resulting consequence will see financial institutions calling loans thereby forcing once viable enterprises to be sold, most likely at a much less than equitable price.

84

Question: Where in the DEIS is the effect of lowering debt/equity ratios assessed and how will such effects be incorporated into the management decision making process?

Recommendations: A consideration of how impacts would be realized over time should be considered in economic considerations given in the grazing DEIS. MCI would suggest that the guidelines for social and economic analysis in grazing impact statements laid out in BLM instruction memorandum number 81-88 be followed.

To adequately estimate economic impacts of adjustments in BLM policies, the fact that ranchers may be forced out of business must be explicitly addressed.

SUMMARY

In summary, the Board has made recommendations to the Draft RMP to aid in formulating an acceptable Final RMP. The major recommendations are:

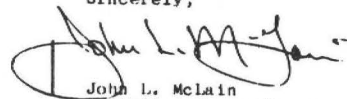
- 1) The proposed action should be a combination of the Preferred and No Action Alternatives. The Board contends that since RMPs have been written in the past, that monitoring has been occurring for some time, and that selective management is required, there should be very little difference between the Preferred Alternative in the RMP and the continuation of present management.
- 2) The No Grazing Alternative should be eliminated.
- 3) Permittees should be allowed to run any number of livestock, so long as it does exceed active preference levels, during the short term.
- 4) Incorporate the concept of commercial harvest of pinyon-juniper woodland harvest into the Final RMP.

Comment Letter 54

Merrill DeSpain
December 22, 1983
Page 16

The N-4 State Grazing Board is well aware that the RMP is an instrument of analysis as opposed to a decision document. However, this does not preclude the Egan Resource Area's responsibilities in presenting reasonable alternatives, accurate data, and objective analysis. The Bureau of Land Management has a commitment to the public to produce an unbiased document. We do not feel that the Board's concerns, expressed during the planning process, were adequately addressed in the draft RMP. Hopefully, these concerns will be addressed in the Final RMP. The N-4 State Grazing Board welcomes the opportunity to discuss these comments in person prior to the formulation of the Final RMP. We look forward to discover what changes the Draft RMP will incur as a result of our comments as well as those of others. The N-4 State Grazing Board appreciates the opportunity to comment and improve the Draft RMP.

Sincerely,



John L. McLain
Certified Range Management Consultant

JLM:db

Comment Letter 5 5

Comment Letter 5 5

Ely, Nev.
Dec. 22, 1983

Merrill L. Delpain
District Manager
Bureau of Land Management

Dear Sir:

48

Even though the bureau has recommended the South Egan Range unsuitable as a whole for a wilderness area, I feel we should protest the suitability of any portion as being suitable. Our objections are as follows.

First is the possibility of a large mining area. This is in the north part of the study area. Not only the northern portion but the nine mile area on the east side of the mountain and the foot hills on the north western portion.

Second the possibility of oil or gas in the southern portions.

Third the numerous roads in the area from east to west, south and north. A primitive area in my opinion should be a place of solitude. A place that is quiet except for the birds and animals of the area and you have the occasional noise of an aeroplane overhead. In the latter part of 1983 in August, September, October and November, I spent about twenty nine days in the northern part of the study area. There wasn't a day when from two to four or more pickups and trucks and an occasional motorbike disturbed the solitude.

Fourth is the nearness of the town of Lund.

Fifth is the use of the area by the people of Lund and Preston. They have used it from 1900 to the present time for grazing, timber for building, fence posts, fuel wood and rocks for building plus picnicing, hiking and hunting.

I am better acquainted with the northern half of the study area than any other living being as my father run sheep and cattle in the area for years.

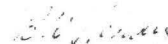
page 2

I have walked the area many times and have ridden it horseback. I have hunted in the area for the past fifty five years and camped in the area many times, prospecting and mining.

I am writing this letter of protest in behalf of myself and all the Hendrix families who have an interest in mining claims in the area.

A copy of this letter, with the signatures of all concerned will be mailed to the Governor of Nevada and to our congressman and senator.

Sincerely,



B. W. Hendrix
321 Fay ave.
Ely, Nev.

Comment Letter 56

Box 87
Cortaro, AZ 85230
December 21, 1983

Merrill DeSpain
Ely Dist. Mgr.
BLM
Star Rte 5, Box 1
Ely, NV 89803

Dear Mr. DeSpain:

Please enter this letter as part of the public hearing record for the Ely District Wilderness Studies.

1 I support a 28,600 acre Goshute Canyon wilderness, a combination of the Preferred Alternative and the Wilderness Emphasis Alternative. Goshute Canyon, containing several hundred acres of bristlecone pine and rare spotted bats, should be set aside with wilderness protection to preserve the flora and fauna.

2 A South Egan Range 57,600 acre wilderness should be created. In addition to bristlecone pines, the area contains an unusual pit cave. Wilderness would afford protection. I support a 45,791 acre wilderness for Riordan's Well. This area is

Comment Letter 56

3 an important predatory bird area and wilderness would help maintain present bird populations. L2

A 46,871 acre Park Range wilderness should be created. One of the state's few remaining virgin grasslands is found in this area. Wilderness would help maintain the present flora which has considerable scientific value.

Sincerely

Thor Lane

Comment Letter 57

Comment Letter 57

1850 Prior Road
Reno, Nevada 89503

Dec. 21, 1983

Merrill DeSpain
Ely District Manager
BLM
Star Route 5, Box 1
Ely, Nevada 89803

Dear Mr. DeSpain,

I wish to offer comments on the BLM's wilderness recommendations for the Egan Resource Area. I strongly support designation of wilderness in Nevada to protect some of the wild country in our state. Your recommendations will be a very major part of that process. The Ely District BLM lands have undergone sharp scrutiny and all those areas that have conflicts or do not qualify have been eliminated. The four areas that remain all have outstanding wilderness character and the majority or all of each area should be recommended for wilderness management. Specifically, I recommend the following areas:

1 | Goshute Canyon This area is particularly scenic and has abundant wildlife values, particularly Utah Cutthroat trout, rare spotted bats and various big game species and birdlife. The recommended unit should include a combination of the preferred and wilderness emphasis alternatives, which total approximately 28,600 acres. The areas of high mineral potential in the south should be eliminated, although the preferred alternative eliminates an excessive amount of land in the southern part.

2 | South Egan Range The high Egan Range in this area should be included in the recommendation, as indicated in the 57,660 acre wilderness emphasis alternative. This unit offers rugged recreational country and excellent raptor and large game habitat. While several ways exist in the total unit (most of which are on the edge) the area retains very high wilderness character and should be recommended. Roads can be cherry stemmed and ways returned to a natural condition.

3 | Riordan's Well The 45,791 acre wilderness emphasis alternative most adequately presents the best wilderness recommendation. The unit is adjacent to the USFS recommended Grant Range and the BLM recommended Blue Eagle unit, and together, they make a particularly outstanding and large area for wilderness protection. Essentially no mineral conflicts exist. This large area is particularly valuable for recreational opportunities and is truly remote and offers unequalled solitude.

2.

Park Range The preferred alternative for the Park Range is excellent. This pristine area, guarded by steep limestone cliffs exists as a biological resource research area. Since it has not been grazed extensively and has not been roaded, it still contains historically natural areas that must be protected and kept in their pristine condition. There are essentially no conflicts, and this area, particularly, has scientific merit, in addition to the wildlife and recreational values.

The BLM has done a good job identifying these units, and I am hopeful that each of these very valuable areas can be protected for our children over the long term.

Thank-you for considering these comments.

Sincerely,

Glenn C. Miller

Comment Letter 58

816 Lillis
N. Las Vegas NV 89030
December 26, 1983

Merrill DeSpain
District Manager
Star Route 5
Box 1
Ely, NV 89803

Dear Mr. DeSpain:

I realize that the deadline for letters regarding the wilderness recommendations for the Egan Resource Area was the 24th, but I hope this letter will still be considered. With Christmas and all, I just didn't manage to write it any sooner.

I would like to compliment the Bureau of Land Management for its Preferred Alternative. I believe that you acted sincerely in evaluating the potentials for wilderness. The Egan Area contains great potential for wilderness. However, I feel that certain additions are necessary in order to best evaluate this area.

1 | First, in the Goshute Canyon area, it is important to combine the Preferred Alternative and the Wilderness Emphasis Alternative. This area is extremely valuable for wilderness, especially because of its bristlecone pine and aboriginal site. In addition, it has extremely important wildlife values--both "ordinary" wildlife such as deer and elk, as well as rare wildlife such as rare spotted bats and Utah Cutthroat trout. The area is extremely important to hikers, photographers, cavers, and backpackers. Although there were mineral conflicts in the southern part of the WSA, these have been eliminated, so there is no reason not to preserve as much land as possible in this area as wilderness.

2 | I would also recommend you propose the South Egan Range as wilderness. This area would be a unique addition to the wilderness system because of its limestone cliffs and white fir forests. Furthermore, it also offers much habitat for raptors and deer.

I would very much applaud your recommendation for the Park Range. You have recognized the lack of resource conflicts and the excellent opportunities for wilderness experience in this range.

3 | Finally, I would recommend you greatly enlarge your recommended wilderness for Riordan's Well. It is important to complete the wilderness recommendation in this area, between the Forest Service recommended wilderness and the proposed Blue Eagle Mountain wilderness. Again, there are few mineral or other conflicts in this area.

As I stated above, I hope this letter is not too late to help urge you to consider expanded wilderness proposals. The Egan

Comment Letter 58

Resource District is an important wilderness resource for residents throughout the state of Nevada. Even if all the above areas were included in a wilderness proposal, less than 5 per cent of the Resource Area would be proposed for wilderness.

Sincerely,

Cheri Cinkoske

Comment Letter 59

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

Kevin M. Smith
1056 Helms Ave. S
Reno, Nev. 89502

Comment Letter 60

December 15, 1983
5901 Broadway #1
Oakland, California 94618

Merrill DeSpain,
Ely District Manager,
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89703

Thank you for considering the following areas for wilderness designation:

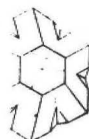
- Goshute Canyon WSA
- Park Range WSA
- Riordan's Well WSA

2

Future generations will surely benefit as well as this generation. However, I believe the South Egan Range should also be considered. I understand it is an important raptorial bird location.

Sincerely,
Marta Porter
Marta Porter

Comment Letter 61



MINERALOGICAL RESEARCH CO.

DIVISION OF THE NAZCA CORPORATION
Eugene & Sharon Cisneros • 704-708 Charcot Avenue • San Jose, California 95131-2292 U.S.A.
Phone: (408) 263-5422 DAYTIME
(408) 923-6800 EVENING

DECEMBER 8, 1983

Merrill DeSpain
Ely District Manager
U.S. Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89803

Subject: Egan Resource Area

Dear Mr. DeSpain:

It has come to our attention that the Ely District of the BLM is considering the suitability of four Wilderness Study Areas in the Egan Resource Area for inclusion into the National Wilderness System, specifically, the Goshute Canyon Area, South Egan Range, Park Range, and Riordan's Well.

Our company has been directly involved in the marketing of mineralogical samples for research institutions, school use, private collection, and museum display for nearly twenty years. While we have, from time to time, had the opportunity to deal in small amounts of mineral samples from the State of Nevada, we have never been offered, or heard of, any valuable mineralogical or mining areas or sites within the area in question. If such resources exist, they would be as an extremely small type of deposit, and certainly would not constitute what you could refer to as a valuable mineralogical occurrence or mineral reserve, suitable for mining.

We feel it is extremely important to preserve these valuable wilderness areas, and that mining ventures in these areas should not be allowed, on the basis of our observations of the materials present in quantities sufficient to support profitable ventures on the part of the mining industry, during the time we have been in business.

Very truly yours,

MINERALOGICAL RESEARCH COMPANY
DIVISION OF THE NAZCA CORPORATION

Sharon L. Cisneros
Corporate Vice President

SLC:mk

SHOWROOM OPEN BY APPOINTMENT

Fine Crystal & Mineral Specimens — Worldwide Localities Available
Rare Mineral Species for Research, Museum, and Systematic Collections
Meteorites — Import & Export — Mina Numero Uno — Crystal Photography — Microscopes
Ultraviolet Lamps — Specimen & Jewelry Boxes — Display Stands
Mineralogical Books — Mineralogical Record Back Issues

125

Comment Letter 62

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
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- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely, *Aug Q. King*
1218 Pattick Ave.
Reno, NV

Comment Letter 63

Comment Letter 64

December 24, 1983

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 3, Box 1
Ely, Nevada 89301

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 3, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

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Sincerely,

Sincerely,

Ann Rosemary Kiratin
1650 Royal Drive
Reno Nevada, 89503

Merrill DeSpain
1650 Royal Drive
Ely, Nevada 89301

Comment Letter 65

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

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The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*Laura K. Kingston King
1215 Patrick Ave
Reno, Nevada
89509*

Comment Letter 66

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

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The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*William Keuter
1650 Royal
Reno, NV
89503*

Comment Letter 67

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

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The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

Gregory P. Ebner

14 East "I" St

Sparks, Nevada 89431

Comment Letter 68

December 24, 1983

Merrill DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

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The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

8 Prof. Earl W. Kessler

1650 Royal Dr Reno, NV 89503

and

Geography Dept., Univ. of Nevada, Reno, NV.

Comment Letter 69



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO: _____

GREAT BASIN GROUP
P.O. Box 8096
University Station
Reno, Nevada 89507

LAS VEGAS GROUP
P.O. Box 18777
Las Vegas, Nevada 89119

December 23, 1983

Merrill DeSpain, Manager
BLM/Ely District
Star Route 4, Box 1
Ely, NV 89803

Dear Manager DeSpain,

I am submitting these comments on the Egan Draft Resource Management Plan and Draft Environmental Impact Statement as Chair of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club. The Toiyabe Chapter has nearly 2,000 members in Nevada and Eastern California who are vitally concerned with the quality of public land management in the Egan Resource Area. The public lands committee has considerable expertise in its review as it has reviewed all previous grazing EISs produced in Nevada and Sierra Club members have participated in local planning groups and BLM advisory councils when permitted by the national administrations.

I was very disappointed with the Egan RMP/EIS as it proposes no real solution to very serious public land management problems in the Egan RA, except categorization of allotments into M, I, and C and extensive and expensive vegetation conversions which primarily benefit livestock. There is extremely limited reference to reducing or eliminating livestock overgrazing or even to improving the ecological condition of the vegetation, which would actually benefit wildlife and wild horses, improve watershed, recreational, wilderness, and all other non-commodity values, in addition to livestock operations.

Nowhere does FLPMA or PRIA state the overall goal of public land management is "to improve the resources of the resource area which would result in increased goods and services to the public lands users and general public." (p.11) A less commodity oriented goal which would comply with the stated intentions of Congress would be "to improve and maintain public rangelands to good or better ecological condition." An objective to reach this goal would be "to reduce overgrazing by adjusting livestock numbers to the carrying capacity of the range and developing grazing systems which comply with the principle of sustained yield, a legal requirement of BLM operations.

85 | Any vegetation conversion projects should be considered only
16 | after grazing management has been implemented, not in
substitution for a grazing system. When AUMs increase due to
improved grazing management, they should be used to make up for
the BLM-estimated forage deficiency in over 90% of the RA, not be

To explore, enjoy, and protect the natural mountain scene...

Comment Letter 69

60

used to justify increases in livestock numbers, as the EIS implies. And why is fire so over-proposed as a conversion technique? There is no justification given for the purported improvement in wildlife habitat by extensive burning. In fact, most wildlife professionals oppose a "let-burn" philosophy, especially when an increase in livestock forage production is the BLM goal.

86

Not enough emphasis is given to the use of other standard range management practices, such as the setting of utilization levels of vegetation, especially that important to wildlife, nor to maintaining a credible and functioning monitoring program. In fact, we are very concerned that monitoring in the Egan RA will be used to justify additional range improvements to bring forage up to and beyond existing (over) stocking rates, not to adjust livestock numbers to the carrying capacity of the public rangelands. We would have little confidence in such monitoring data.

33

In addition, adjusting seasons-of-use does not appear to be under consideration for use in the Egan RA. The EIS is fuzzy on how many AMPS will be developed for the 90 allotments without grazing management and when. No range improvements should be even considered unless they are a part of a comprehensive AMP.

87

70

It is totally unacceptable to the public concerned with proper range management and the correction of historic abuses of livestock overgrazing for BLM to propose in most of its alternatives to license livestock use at the 3 year average levels or higher when the EIS acknowledges extensive overgrazing, i.e. "forage demand is far greater than forage production" (p.20), although estimates of acreage in poor, fair, good, and excellent condition are never made. Instead, statements on range condition and carrying capacity are prefaced by "professional judgement and preliminary data from monitoring studies indicate." Doesn't BLM even know the condition of the rangeland it is supposed to be managing? What is its "preliminary data?" If BLM does not know range conditions or carrying capacity, then on what legitimate basis is the agency permitting any livestock use of the public lands?

26

The EIS appears to be written to obfuscate the actual poor conditions of the public land. The use of "percent acres in desired successional stages" instead of poor, fair, good, and excellent (if any) are worthy of Orwell's prophecies of doublespeak in 1984, which has arrived! It is not even clear that if the Egan RA successional stages occur as desired that the public rangelands will be in satisfactory condition. It appears that BLM is using this language to confuse the public and to be thus relieved of accountability for poor management.

88

Categorizing allotments into M, I, and C is an action designed to convince the public that something is being done about livestock overgrazing. Categorizing is a paper exercise, which on its face is ridiculous. Putting 76 allotments into M & C categories (i.e., do nothing) when BLM admits that over 90% of the Egan RA

Comment Letter 69

is overgrazed, riparian areas are being systematically destroyed, only 5 allotments have AMPs, etc., is a callous disregard of BLMs public land management responsibilities.

1
2
3

Wilderness was handled with more consideration. We support an increase to the Preferred Alternative for the Goshute Canyon WSA to 29,000 acres. Its wilderness and numerous other natural values make it an outstanding addition to the National Wilderness system. We support the Wilderness Emphasis Alternative for the South Egan Range WSA of 58,000 acres. The unique white fir forests, the hardy bristlecone, the limestone caves, the important raptor sites as well as its solitude and outstanding opportunities for primitive recreation qualify the WSA as wilderness. The 47,000 acre Preferred Alternative recommendation for the Park Range is very good. We support it especially given the pristine meadows which should be used as a comparison for excellent ecological condition. We support the 46,000 acre Wilderness Alternative recommendation for the Riordan's Well WSA. Resource conflicts are minimal and wilderness values are extremely high in this rugged area.

75

We have several other general complaints about the planning process in the Egan RA. While the RMP/EIS states (p.11) that "RMPs are designed to make maximum use of the best available data in formulating and analyzing alternatives," the document never states what data is available. Have range surveys been conducted? When was monitoring initiated in the Egan RA? What kind of monitoring has occurred, where, and for how long? How is this data actually used?

The lack of specificity in the Egan RMP/EIS leads this reviewer to conclude that this EIS is programmatic and will not meet a court test of its adequacy.

89

The Sierra Club is also concerned about the lack of identification of Areas of Critical Environmental Concern in the Egan RA. It is inconceivable that in 3.8 million acres, the BLM can find no ACECs. It is well known that the Egan RA has critical wildlife habitat, including habitat for rare and endangered species, bristlecone pine areas, significant archeological and cultural sites, and other scenic and geological areas of public interest. The RMP and EIS is quite deficient in complying with its own regulations on ACECs.

58

We are very interested in the principle articulated on p.15 regarding ORV designation. The RMP states "An undefined 'potential' for off-road vehicle use damage is not adequate justification for constraints on off-road vehicle use." Does this principle also apply to land disposal, i.e., "an undefined or non-specified 'potential' for disposal of public lands is not adequate justification for BLM proposed disposals in the Egan RA?" Does this principle apply to wilderness designation, i.e., "an undefined or non-specified 'potential' for minerals in a WSA is not adequate justification for BLM proposed negative recommendations for wilderness designation or the elimination of

90

Comment Letter 69

large areas of WSAs due to 'mineral conflicts'?" BLM should try to be consistent!

33

We object to the handling of "mineral resources management" (on p.15). Doesn't the BLM have some regulations regarding the minimization of negative environmental impacts of mining exploration and development or at least some requirements for minimal reclamation of disturbed areas? If so, environmental protection from disturbances from mineral development should be a part of the Egan RMP.

29

The treatment of the destruction of riparian areas by unmanaged livestock and BLM actions proposed to correct this problem are very superficial. Is not BLM specifically mandated to protect riparian areas and manage them in good or better condition? If so, the proposed alternatives are deficient.

26

A particularly obtuse statement on p.23 requires clarification. What is meant by "All vegetation will be managed for those successional stages which would best meet the objectives of this alternative"? The paragraph was truncated by a misplaced paragraph 5 before it could reveal which Appendix attempted to quantify this obtusity. Although the Preferred Alternative is supposed to be balanced, the management actions described appear to almost exclusively benefit livestock; therefore, does this unclear statement mean that the vegetation will be managed to benefit livestock?

11

The acreage proposed for disposal is totally unacceptable. No justification was given for how the disposal of 80,000 acres is in the public interest, nor even of who is requesting such massive land disposals. The law provides for reasonable disposals for community expansion and other public purposes and for small unmanageable parcels, not for thousands of acres which apparently will benefit private individuals, not the public.

62

In general, we support Alternative B, but feel it is a feeble effort in an overall inadequate plan to balance land management among all the multiple uses. We have no idea if livestock levels of 75% of 3-year average use is adequate or not. Are 92,000 AUMs within the carrying capacity of the range?

91

The other alternatives are obviously inadequate. We do commend BLM for including a NEPA-mandated no grazing alternative, but the general non-specificity of this EIS practically negates the usefulness of using the no-grazing alternative for base-line comparisons. Why is the requirement for a benefit-cost ratio of 1.0 for range improvement projects only mentioned in one alternative? Does this requirement not apply to projects in all alternatives? Or does BLM propose to fund range improvements in which costs exceed benefits?

88

According to information obtained from the Nevada Department of Wildlife, there are inaccuracies or substantive disagreements on the categorization of 20 allotments into M or C categories. We

Comment Letter 69

support DoW recommendations for all the 20 allotments to be put into the I category.

The Egan RMP/EIS is one of the most poorly written documents I have yet reviewed. Substantively, it is inadequate, leading me to believe that the BLM does not know much about the Egan RA, its problems, or their solutions or that the Bureau is not courageous enough to honestly describe the problems nor take the necessary corrective actions. I hope and trust that this "plan" will be rewritten when reason is restored to public land management in this country.

Thank you for considering my comments.

Sincerely,


Rose Strickland, Chair
Public Lands Committee of the Toiyabe Chapter of the Sierra Club

Comment Letter 70

WHITE PINE SPORTSMEN
Nevada Wildlife Federation - Member
P. O. BOX 1187
ELY, NEVADA



December 29, 1983

Bureau of Land Management
SR 5 Box 1
Ely, Nevada 89301

Attention: Merrill L. DeSpain

Subject: Comments on Egan Draft Resource Management Plan

Our primary interests are wildlife and recreational use of the land,

27 | Our most serious concerns for wildlife are: 1) present overpopulation of wildhorses, 2) almost no habitat improvement for wildlife,

40 | The wildhorse overpopulation problem is severe in the Buck-Bald Mountains and Long Valley areas for mule deer. These areas are winter range for our mule deer and the habitat is being ruined. Since the U.S. Congress resists efforts to legally and rapidly reduce the impact of these wildhorses, the problem drifts year after year. We deplore the lack of action by U.S. Government agencies and the U.S. Congress. We don't see how you can have an effective, long range "Egan RMP" without this problem being addressed in total,

92 | Our concerns for recreational use of RMP land is that the citizens of Nevada will have the same access to all RMP public lands after the RMP is implemented as before. There are literally hundreds of four wheel drive roadways existing that do not show up on official maps. If they aren't considered a maintained roadway, they are defined as not existing. If these wilderness areas are created, a great deal of access will be lost to older and physically impaired citizens. We applaud the principle of setting aside some of our public lands for wilderness. Our great basin valleys also have many unique wildlife, plant, and scenic features, but they aren't included in wilderness areas. The mountain ranges that are included are so narrow that they would make only marginal wilderness areas at best.

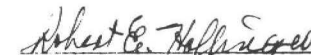
93 |

94 |

4 | The "Preferred Alternative" is flawed from our point of view, in several areas: 1) wildhorse populations aren't being reduced, 2) nearly 1/2 of total proposed wilderness study area acreage is included which has substantial negative impact on mining,

We do not support the "Preferred Alternative" nor "Alternative A through E" as written.


Bob Marcum, President


Bob Hollinger, Secretary

Comment Letter 71

CITY OF ELY

BOX 299
ELY, NEVADA 89301

January 9, 1983

Bureau of Land Management
SR 5 Box 1
Ely, Nevada 89301

re: Egan Wilderness Study

Gentlemen:

The Ely City Council at its January 9th meeting discussed the Egan Wilderness Study performed by your agency. The City Council feels if this designation will in any way hurt the economy of Ely (ie: White Pine Power Project, oil and gas exploration etc.) than the City of Ely cannot in any way support this possible designation.

Sincerely

Robert Spellberg
City Clerk

cc: Mayor White
Ely City Council

Comment Letter 72

2955 Berkshire
Cleveland Heights OH 44118

January 13, 1984

Mr. Merrill L. DeSpain
District Manager
U.S. Bureau of Land Management
SR 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

I must apologize for the tardiness of this comment. However, I feel that there are definite extenuating circumstances. I requested the Egan EIS, RMP, and Wilderness Technical Report (WTR) on December 14 and it was mailed from Ely that day. It was not delivered to me until December 27 and already after the due date. It was not sent PRIORITY mail. The Lahontan EIS, RMP and WTR were requested on December 13. These were sent PRIORITY mail and arrived on the 15th.

Technically, you can throw the attached comment away, disregard it, or not even read it, but you are not obliged to do so. You can also still accept it and I hope that you will.

I feel that I am uniquely qualified to comment on the issue of wilderness in northern Nevada as I am a member of every responding special interest group except ranching. I am a professional geologist with a Master's degree in geology and work experience with the U.S.G.S. (field mapping); Hanna Mining Co. (base and precious metal exploration); Humble Oil and Refining Co., now Exxon (geophysics). I have also been president of my own mining company, Phoenix Mineral and Mining Associates, for ten years. That company successfully carried out precious opal mining operations at Virgin Valley, Humboldt Co., Nevada, for two years as well as base and precious metal exploration and property evaluation in Nevada, Alaska, and elsewhere. During the opal mining operation we had the largest mining operation in Humboldt County according to the Nevada Bureau of Mines. I feel that I am familiar with much of northern Nevada because of these activities.

Presently I am Curator of Mineralogy at the Cleveland Museum of Natural History and consider myself a conservationist. I also do considerable field collecting of rocks and minerals and am deeply involved with regional and national rock-hound organizations. I have two bad knees which prohibit extensive field work so I cherish my ability to drive my car like an ORV into the most outlandish areas. (I've gone farther than some motorcycles and pulled jeeps out of bogs.) I am an Eagle Scout (1958) and have enjoyed primitive camping in the West since 1956.

Comment Letter 72

In addition, my parents had three lots on Assateague Island which were taken by the U.S. government for the National Seashore there with what I still consider to be woefully inadequate compensation. There is absolutely no question, however, that the area has been put to a much better use as a National Seashore than had it been developed in cottages. I thoroughly enjoyed my subsequent visit there.

Possibly I have written far too much about myself but I am going to propose some things for which I thought it best to state my qualifications. The most important is that I love northern Nevada very much and would consider it an honor to live there. Virtually everyone I spoke with in the area also cherishes the place, but most, in fact, are so familiar with it that they do not appreciate the uniqueness of the environment in which they live. In time, I think that they and their children will thank you for saving some portion in a degree of wilderness. The designation of wilderness areas seeks to preserve exactly those elements of the environment that we all cherish, whether we be ranchers, miners, rockhounds, or "conservationists" (whoever they are).

Finally, I would like to especially thank those who prepared the Wilderness Technical Report and Environmental Impact Statement. They have provided concerned persons of all persuasions the facts with which to make informed comment. It is deeply appreciated. I hope that my comments are received by them as an extension of the same theme -- that all of us are trying to find the most suitable use for some unique lands that we all cherish. I would like to receive any comments from BLM or others regarding this comment. I also wish to be kept informed of all matters relating to BLM actions on wilderness in the Ely District.

Sincerely,


Paul C. Clifford

Comment Letter 72

COMMENTS ON EGAN DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT AND SUPPORTING EGAN WILDERNESS TECHNICAL REPORT

The Wilderness Study Areas (WSAs) of interest are:

Goshute Canyon (NV-040-015)
Park Range (NV-040-154)
Riordan's Well (NV-040-166)
South Egan Range (NV-040-168)

Comments pertaining to all four WSAs

All four of the areas under consideration have been designated Wilderness Study Areas (WSAs). Under the Wilderness Act of 1964 and Federal Lands Policy and Management Act (FLPMA) of 1976, Section 603, these areas are to be managed under an Interim Management Plan (IMP) which essentially treats them as wilderness areas until Congress designates each area a Wilderness Area or returns the specific area to general multiple use. As a WSA each area has been found to be suitable as wilderness under the Wilderness Intensive Inventory. To delete an entire area or portion of an area from recommendation to Congress there must exist a documented and clearly overriding resource or management conflict. Ties must be settled in favor of wilderness designation. Those areas without a documented significant conflict must be recommended as suitable. This comment will focus on conflicts cited by BLM for reductions of acreages suitable for recommendation to Congress for Wilderness Designation.

Size, naturalness, and outstanding opportunities for solitude or primitive recreation are mandatory wilderness characteristics which are splendidly met by all four WSAs. Special features, multiple resource benefits, and diversity in the National Wilderness Inventory are additional (supplemental), highly valued, but not mandatory wilderness characteristics. It is also my understanding that decisions in California RARE II disputes as applied to WSAs and Interior Board of Land Appeals decisions in Utah and Arizona mandate that only man-generated imprints arising within a WSA are to be considered. Imprints such as noise and view impairment arising outside the area are not to be considered. Minor imprints such as range improvements do not disqualify an area.

Wilderness Study Policy and Planning Criteria Quality Standard 4 states: "In determining whether an area is suitable or unsuitable for wilderness designation, the BLM wilderness study process will consider comments received from interested and affected publics at all levels: local, state, regional, and national. Wilderness recommendations will not be based exclusively on a vote counting majority rule system. The bureau will develop its recommendations by considering public comment in conjunction with its analysis of a wilderness study area's multiple resource, social, and economic values and uses." This clearly says that the recommendation isn't a beauty contest. Informed public comment pertinent to the issues of analysis will be considered by the BLM. Yet at the end of the presentation of each alternative there is a section under Social Conditions anticipating the local and nonlocal responses to the alternative. This is very troubling, because it seeks a political solution to what is basically a technical process, namely determining suitability of all or part of a WSA for designation as wilderness.

This is painfully obvious in the case of wilderness designation. The severe changes made in the Preferred Alternative (as opposed to the balanced approach put forward in the Mid Range Alternative "C") regarding wilderness have been brought forward, without BLM comment or justification, apparently to placate certain segments of the local community. According to Wilderness Study Policy and Planning Criteria, each quality standard will be "fully considered and documented" in determining recommendation as suitable or unsuitable.

95

As BLM chose to include the wilderness considerations with the RMP they must still justify (document) why the preferred alternative is better, particularly since it is so different from the Mid Range Alternative. As such the EIS is severely if not fatally flawed as regards wilderness designation recommendation.

It is critical to accurately evaluate potential resource or management conflicts to determine the ultimate suitability of each individual WSA. The Egan Wilderness Technical Report (WTR) is generally an excellent document setting forth well the facts necessary to make proper decisions. The most important differences of opinion are the valuation of mineral potential and the consistent introduction of outside imprints which should not be considered (see above).

While the technical report is generally excellent, I have major difficulties with some evaluations of that report contained in the Egan Draft Resource Management Plan and Environmental Impact Statement (EIS), most specifically with regard to mineral potential, BLM management conflict concerns with off-road vehicle (ORV) use, and perception of wilderness value.

The conflict with ORV use is a real one. Northern Nevada is one of the most sparsely populated areas in the entire country. Most people would consider this as solitude even without a wilderness title. Yet, for about 140 years people have driven their wagons, trains, cars, trucks and ORVs hither and thither until even here some 97% of the Resource area is unsuitable for wilderness designation. The stereotyped Nevadan is extremely independent and will "drive" (go?) where he pleases. In recognition of this the BLM has removed as much area literally accessible to ORV users as possible from its preferred and wilderness emphasis recommendations. The only difficulty with this defensive approach is that new generations of ORVs are continually becoming available and even now I suspect there is virtually no area absolutely inaccessible to ORVs.

Additionally, some WSAs are severely reduced in size or eliminated altogether by this removal of areas accessible to ORVs. Fortunately, Nevadans are also very law-abiding people with a well-developed sense of social justice. They don't like government interference by laws but usually they will comply with them, particularly if they are viewed as reasonable. I think, in time, more and more Nevadans will recognize that the use of land as wilderness is reasonable.

But what should the BLM do in the meantime? First, one needs to look at the scale of the potential problem. The EIS (p. 93) states:

"Current off-road vehicle (ORV) use within the area is generally restricted, by user choice, to existing roads and trails. Topography, terrain and vegetation effectively eliminate ORV use on much of the area. In addition, the existing roads and trails provide access to many backcountry areas and the roads and trails provide the variety of challenge sought by many

enthusiasts. ORV use is low in comparison to the size of the area. Use is estimated at 8,000 visitor hours per year. Little damage is known to be occurring from the current levels of use or from the current use patterns. Therefore, it is assumed that there are currently no significant impacts from off-road vehicle use within the Egan Resource Area."

The EIS (p. 15) also states:

"Public lands within the Resource Area must be designated either open, limited or closed to off-road vehicle use. Constraints on off-road vehicle use need to be based on identifiable and defensible concerns. An undefined "potential" for off-road vehicle use damage is not adequate justification for constraints on off-road vehicle use. Damage must be shown to be occurring or imminent".

This is a very sensible approach and extends very well to ORV management in Wilderness areas and basically translates "We don't have a problem we cannot document. We will not solve problems we do not have". In terms of management of ORVs no problem has been documented despite a concerted effort to define ORV use as a problem. Therefore ORV use by current patterns (see above) does not pose a significant management problem in the WSAs.

96

BLM is required at present to manage all WSAs to preserve wilderness values under existing IMPS. Management is an active endeavor according to my dictionary and involves manipulation to achieve the desired goals. Removing all substantial parts of a WSA based on potential illegal vehicle trespass on a scale so trivial as described above is not management of wilderness but active abetting of the destruction of it which is forbidden by the IMP. As such, these reductions in size are themselves illegal except in areas of overwhelming impact. These exceptions are very, very rare in the 4 WSAs.

I feel that the best defined boundaries on the ground are existing roads and fence lines. Conspicuous signs can be placed when entering, leaving, or adjoining a WSA. Periodic signs along the boundary roads and at critical logical entry points should be sufficient to inform the public of the presence of a wilderness area. I think that you will get a reasonable compliance as a result of such posting. Boundary effects are always present in any physical system. They must be accepted, tolerated, but not condoned. It is therefore best to site the boundaries such that the boundary effects do not affect core wilderness values i.e. at the side of the boundary road. Determined ORV trespassers will ignore or destroy any other boundary device anyway, including topographic barriers.

The real problem then is what to do with the deliberate ORV trespasser. I would suggest that fines for first time offenders be up to \$100; second offense, mandatory \$500; and third offense, mandatory \$1000 and confiscation of vehicle. The BLM contends that it does not have or anticipate sufficient manpower to police such regulations regardless of desirability or willingness. I would therefore recommend that responsible local people (probably ranchers) be deputized to enforce these rules and that the arresting officer (if deputy or citizen) receive 75% of any fine collected. The BLM should receive the other 25% or 100% if its own personnel make the arrest. Such a system would generate a strong incentive for enforcing compliance from local citizens. The economic gains to the local community from such a revenue source would far offset any adverse economic impact due to designation of any of the WSAs as a wilderness if the ORV problem is as serious as BLM contends.

A second problem involves the evaluation of portions of the WSAs for

Comment Letter 72

97

potential mineral production. There appears to be a mixture of terminology in the WTR and EIS between "high-moderate-low" potential which I associate with the "Classification and Confidence" scheme used in other BLM EISs and "high-good-speculative-low" as defined in the WTR Glossary. In fact they correlate well high=high, moderate=good, low=low. The WTR classification has the crucial and mandatory additional classification of "Speculative." I have addressed this "speculative" component in my comments on other Wilderness EISs. The mineral potentials used in this comment will be as defined in WTR Glossary (p. 144), and recited below:

MINERALS POTENTIALS:

High Potential - High potential is assigned to areas that contain or are extensions of active or inactive properties which show evidence of ore, mineralization and favorable geologic characteristics. All producing properties fall within this category.

Good Potential - Good potential is assigned to areas with several geologic characteristics indicative of mineralization, relatively lower economic value of past production and similar environments out at greater distances from known ore and mineral occurrences. This category may include areas adjacent to known districts or in mineral belts.

Speculative Potential - Speculative potential is assigned to areas having some favorable geologic parameters and inferences based on geologic models and analogies to known favorable environments. Increasing depth of alluvial cover over areas of potential deposits is also a consideration in this category, except in the case of oil and gas potential.

Low Potential - Low potential is assigned to areas that are outside any constructed favorable geologic and mineral trend projections or are buried by over 1,500 meters of alluvium (except oil and gas).

As defined above, all areas of high potential were excluded during the Wilderness Intensive Survey. No mines presently active or inactive are included in any of the WSAs. The areas assigned a high or moderate value in the WTR or EIS should have a lower classification detailed below.

In fact the potential of all four WSAs to produce ore at a profit is quite low. There are no working mines in any of the four WSAs as far as I know and according to the WTR. Most of these areas lie near or directly in the path of early emigrant trails and have been prospected for the last 140 years. Nothing of any real significance has ever been found within them.

There is a big difference between prospecting and developing a claim. Serious development is hard, expensive work. Prospecting, on the other hand, can be anything from a pleasant diversion to hard work as well. I am not aware of any serious development work or large scale mineral prospecting at the present time in any of the WSAs. Given the strong work ethic of most Nevadans I suspect that for many prospecting is a somewhat more socially acceptable recreation than fishing. Besides there are more mountains than fishing holes in Nevada. The main point is that it is socially acceptable to be "working" at prospecting (rather than fence mending, say) but it is not yet socially acceptable to hike, birdwatch, or do other such silly things. None-the-less, prospecting for many is a means of getting away from the

Comment Letter 72

regular routine under the guise of work. The last thing these people want is to actually find something which would demand or warrant serious development. That would be real work again! But, one does need to file a claim now and again and do the annual assessment work (that no one can find later) so that one's wife and peers will take one's effort seriously and not interfere with one's prospecting "work"!

Whether by dint of hard work or pure chance some people do make a valid discovery of mineral wealth. Such fortunate people can stake a valid claim and that claim should be honored. However, the conditions that must be met are pretty strict. First, the claim must be properly located, staked and recorded with both the county and BLM in Nevada. The assessment work must be kept current. And, perhaps most important and least honored, there must be a valid discovery.

A valid discovery of minerals is one "where the evidence is of such a character that a person of ordinary prudence would be justified in the further expenditure of his labor and means, with a reasonable expectation of success, to develop a valuable mine, and where the requirements of the statutes have been met".

There are a number of key words here. Evidence discernable by others rather than hope is required. A prudent person, not a gambler, must assess and be willing to accept the risk of further effort be it labor or money. Remember, the law was written in 1872 and requires either a 10' X 10' X 10' hole or heading or its equivalent or \$100 expended on labor or material directly for the mine. In 1872 holes were drilled with a single or double jack with some poor fellow holding the drill steel in his hands. One hundred dollars was about equivalent to the average working man's salary for an entire year. This is the kind of commitment required in the original law. Our prudent person must have a reasonable expectation of success in developing a valuable mine, i.e., it must be consistently workable at a profit commensurate with return of investment. It cannot just be a hobby, and the overriding principal value must be the mineral produced not the recreational value of the site. Other case laws have developed that the reasonable return is equivalent to all or a substantial part of a person's annual earnings of today, say \$10,000 profit per year.

Serious prospectors and developers holding claims in these WSAs should demand that they be designated as suitable for wilderness. If they are, then the USGS and USBM are required to do an individual in-depth analysis of each claim to determine its validity. Such an analysis is invaluable to the serious claim holder and anathema to the hobbyists.

There was once (and maybe there still is) a program administered by USBM to aid small mine developers in assessing the potential of their property but giving the U.S. Government an equity position in the potential production. A lot of miners wished to take advantage of this program but it was never really funded and very few were actually helped. Here, anybody with a claim in a WSA gets the same or better for free! If the claim is not found to contain a valid discovery then the serious claim holder would want to cut their losses and drop it anyway. Invalid claims should not affect wilderness considerations.

Additionally if the claims are not filed by December 30, or whenever the designation is made, the free market place has determined that the BLM assessments of moderate and high potential do not economically warrant the

Comment Letter 72

expenditure of effort simply to file as the USBM and USGS will have to analyze them for free.

The EIS and Technical Report have been out for some months to tell prospectors where to locate additional claims with a minimum of effort. I suspect that the non-filers are indeed reasonable and prudent people.

Saleable minerals include sand, gravel, and topsoil. However, these commodities can be made available in sufficient quantity in adjacent areas. The extraction and potential of saleable minerals within the WSAs are insignificant.

A number of geologic factors must be present to create an economic concentration of oil or gas. There must be source rocks, usually marine. These must be buried deeply enough to be gently heated but not so deeply that the oil and gas are subsequently heated to such a degree that they are destroyed. The oil and gas must then be able to move to permeable reservoir rocks which are sealed on top and sides to prevent the escape of the oil or gas. The deposit must then be found and developed.

Oil and gas potential is bimodal in the Egan RA. There is valley fill, and various portions of all four WSAs centered on mountain masses. The geologic history of the region essentially precludes economic concentrations of oil and gas in the mountain masses. The conditions above are simply not met. The mountain masses do not end at the topographic break in slope we now observe, but rather they are bounded by faults which may be some distance, often a mile or more toward the valley from the topographic break in slope. This means that the valley edges generally belong to the geologic province of the mountains and hence have a very low potential for oil and gas production.

The fact that these areas are leased for oil and gas has no significance except to show that the government is very shrewd about such leases. Leasees pay a set fee by the acre for the entire lease whether or not particular areas within the lease have high or low potential. Often as much land of low or no potential is added to a lease as the traffic will bear. This happens under the guise of keeping neat boundaries, like township lines, etc. If you want the good you take the bad as well. This has two profitable effects from the government's point of view. First, otherwise unleaseable land is leased at the same rate as higher potential land. Second, more allotments of the same general size can be leased. Both of these make the leasor (BLM) look very good. The oil and gas leases in all of the WSAs essentially fall into this category and should not be considered further.

An indication that leases do not intrinsically mean any real potential for production is seen in the areas where the same ground is leased for both oil and gas as well as geothermal. The two are essentially mutually exclusive. One may have production of either hydrocarbons or steam from a specific site but not both. Geothermal targets are of two types: 1) deep circulation of water on the major boundary faults mentioned above, and 2) igneous rocks cooling near the surface. The fault type target usually gives low to moderate temperatures presently generally only suitable for space heating or processing. These are found associated with many of the mountain masses throughout the basin and range province so are not unusual. The second type of geothermal target, cooling igneous rocks at shallow depth can give very high "dry" steam temperatures eminently suitable for electrical generation. The only significant geothermal area associated with these WSAs is far from the transportation and social infra-structure necessary to warrant

Comment Letter 72

putting it to use except for very local space heating at the isolated ranches. Such use would in no way adversely impact wilderness.

The EIS implies a great adverse economic impact due to wilderness designation due to withdrawal of WSAs from mineral entry. This is totally unwarranted. No larger mines employing a number of people are anticipated in any WSA since overall projections are that there would be no significant changes in area or local economies whether designated wilderness or not. One cannot claim an economic loss of a potential resource that has not been identified, quantified, or even staked with a mineral claim.

For example, the Winnemucca EIS (p. 3-9) correctly states that "wilderness designation allows livestock grazing and range developments (except for vegetative manipulation). However, vegetative manipulation is a proposed project and represents potential AUMs of forage not presently used by the operator, therefore, denial of vegetative manipulation cannot be considered a true economic impact to those operators". The economic impact of vegetative manipulation on range value can at least be quantitatively estimated with a fair degree of accuracy. Nevertheless, the impact is a potential one since the BLM is under no obligation to act to manipulate the vegetation. This is directly analogous to the unpatented mining claims and ground not covered by claims before designation. The potential values contained in unvalidated mining claims, and certainly any values associated with all the ground not even claimed, are not being currently used by anyone. Therefore, denial of development of such resources should they even exist harms no one individually since BLM is not obligated to act by staking claims for "parties unknown."

This is not an economic impact but a perceived diminution of individual opportunity which is a sociological impact. Not one unpatented claim in any of the WSAs has been validated. Claims can presumably be staked until Congress designates the area as wilderness. Anyone who can show a valid mineral interest in a valid mineral claim will be permitted to pursue that economic value and is thus made economically whole. The likelihood of certifying significant numbers of valid mining claims on geologic parameters is dealt with above and in the unit analyses. Overall the likelihood is very low that any of the fraction of claims certified will be brought to actual production. It is not the threat of a claim but the ground disturbance associated with actual development which is detrimental to wilderness values.

The EIS states in all alternatives that wilderness designation will have an adverse impact on grazing permittees because of increased costs of range improvements. However, the EIS also states that essentially all cost effective range improvements have already been made within the WSAs. There is only one range improvement planned in the Riordan's Well WSA. This well will be dealt with in the unit analysis for the WSA. As no other range improvements are planned or held to be cost effective the economic impact is nonexistent. There is an insignificant potential adverse impact if new range improvements are designed and found to be cost effective.

The following WSA unit analyses will show that the sum of all acreage found "suitable" under any of the alternatives other than "All Wilderness" has high wilderness value, is manageable, has an insignificant impact on the minerals and energy industries and an insignificant economic impact on the economy and social fabric of the local area. All such areas should therefore be recommended to Congress as suitable for designation as Wilderness areas.

98

Comment Letter 72

Park Range WSA (NV-040-154)

Size: 47268 acres

Naturalness: Pristine

Solitude: Exceptional
Topographic Screening: Excellent
Vegetative Screening: Good

Primitive Recreation: Outstanding

Special Features: Archaeological sites, ungrazed mountain meadows,
raptor eyries, wild horses

Energy: No recorded production
Oil and Gas: Low potential
Geothermal: 22,250 acres based solely on inference

Minerals: No recorded production
Potential: Low metallic mineral potential
Claims: None

Manageability: Said by BLM to be manageable under the preferred
alternative
Essentially self protecting
No private land
437 acre crested wheat grass seeding

Manageable Forest Land: 9000 acres or about 2% of RA resource

Economic Impact: Negligible on all sectors

BLM Perceived Conflicts:

Conflict # 1: 437 acre seeding is unnatural
BLM Resolution: Exclude from suitable area
Acceptability (this comment): Acceptable

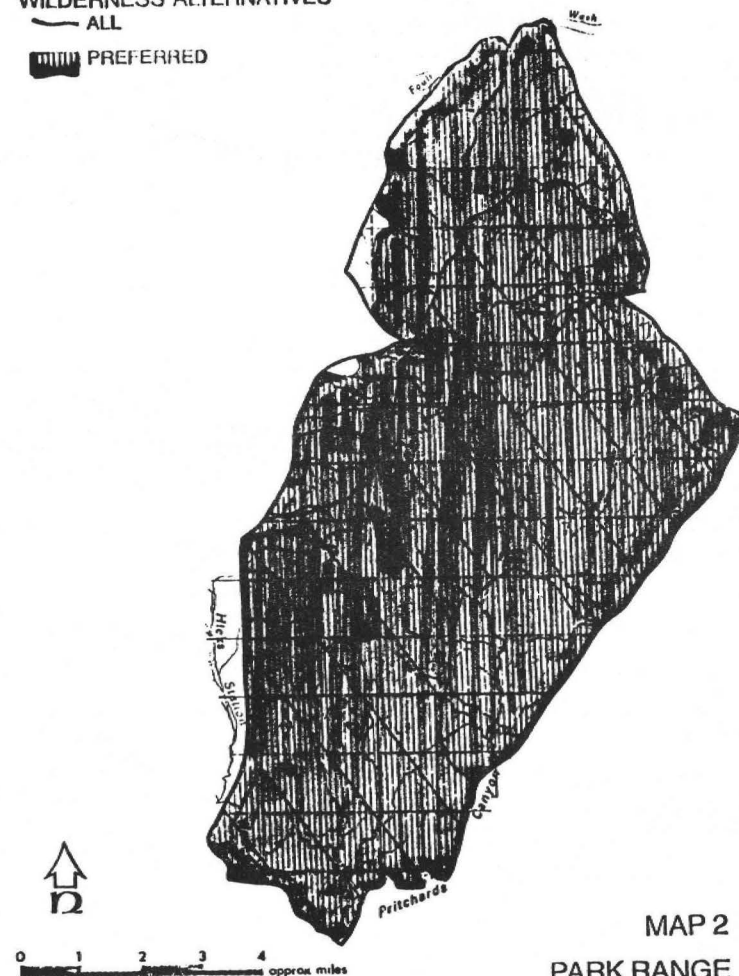
Conflict # 2: 22,250 acres moderate geothermal potential
BLM Resolution: Ignore - mitigated by remote location
and lack of economic infrastructure
Acceptability (this report): Concur with comment.
This moderate classification is too high to begin
with. No geothermal activity is known in the WSA.
Classification is based only on inference and
is therefore "speculative" potential. Action is
the same.

Area To Be Found Suitable: 46,831 acres (same as the preferred
alternative)

Comment Letter 72

WILDERNESS ALTERNATIVES

— ALL
▨ PREFERRED



MAP 2
PARK RANGE
NV-040-154

Comment Letter 72

Rioden's Well WSA (NV-040-166)

Size: 57,002 acres

Naturalness: Very natural

Solitude: Excellent

Topographic Screening: Very Good to Fair
Vegetative Screening: Excellent

Primitive Recreation: Good (BLM).

Comment: I do not understand this rating. The diversity of scenery may not be outstanding but the opportunities for primitive recreation are excellent. Scenic qualities are excellent in mountainous core and throughout Heath Canyon.

Special Features: Ponderosa Pine, wild horses, raptor eyries, elk and big horn sheep, especially scenic Heath Canyon, Thunder Cave

Energy: No recorded production
Oil and Gas: Low, no potential
Geothermal: Low, no potential

Minerals: No recorded production
Metallic Minerals: 2950 acres moderate (BLM) remainder low potential
Non-Metallic Minerals: Moderate throughout WSA
Claims: Two blocks - 16 in and near Great Canyon; 47 in the east central portion; 23 along southern border

Manageability: Said by BLM to be manageable under the Wilderness Emphasis (C) Alternative. There are no private inholdings. There are numerous cherry stem routes along the SE bench which pose an ORV problem. There is one proposed well.

Manageable Woodlands: 17,892 acres or about 4% of RA resource

Economic Impact: Negligible all sectors

BLM Perceived Conflicts:

Conflict # 1: 2950 acres of moderate (BLM) metallic mineral potential would be withdrawn from mineral entry
BLM Resolution: Under the Wilderness Emphasis Alternative 1230 acres would be included in the suitable portion.

Comment Letter 72

The remaining 1520 acres would be part of 7360 acres deemed unsuitable in the western tip
Acceptability (this comment): The "moderate" potential classification is too high. It is based solely on the presence of the thrust fault (a favorable geologic parameter) and the jasperoid gold deposit model. No jasperoid is in fact known. This fits the definition of "speculative" potential exactly. There is some potential for gold and tungsten according to the BLM because of mines in the Troy District to the southwest. The geologic environments which host these ores are not known to extend or occur in the WSA. There are no occurrences or prospects in the WSA (WTR p. 63). The 2950 acres should have a "speculative" classification. The entire 7360 acres, which has high wilderness values, should be returned to the suitable area. This area (7360 acres) is critical as it is adjacent to a USFS Presidentially endorsed wilderness area to the south and connects along the length of Heath Canyon to Blue Eagle WSA which is recommended preliminarily "suitable" in the Tonapah Draft EIS. Designation would also increase manageability of all three areas by making the total designated area more compact.

99

Conflict # 2: There is a proposed stock well in the Dry Basin (also in the 7360 acre area above)
BLM Resolution: Either declare 7360 acres unsuitable or disallow development of the well

Comment: The permittee does not have a "right" to the well. It is unclear from the EIS and WTR if the proposed well is cost effective. Let's assume that it is. The proposed well is only 0.75 miles up a draw into the WSA. If the well can be moved downstream it would soon be outside the WSA and be allowed. Alternatively the well could be permitted where it is and access allowed if sufficient justification can be found for protecting the range or wilderness value. This may take some creative thinking on the part of those in favor of development. The simplest and best solution is just to move the well downstream to the WSA boundary. The well is certainly not justification for removing 7360 acres of prime wilderness from "suitable" status.

100

Conflict # 3: "Moderate" potential for non-metallic minerals throughout

BLM Resolution: Conflict entirely mitigated by abundant supply, closer to markets available throughout the general area. No rational or interest in development.
Comment: I concur.

Conflict # 4: Excessive ORV accessibility to SE benches.

Comment Letter 72

101

Resolution: Remove approximately 5900 acres (wilderness emphasis) or 5200 acres (preferred) from those "suitable" for recommendation.

Comment: The boundaries proposed by either alternative are within 0.25 miles of each other and in fact cross. Either would be acceptable with the following caveat. I feel that the best boundary is in fact the boundary road. It is easily defined and is unequivocal. There will always be boundary effects and it is best to keep these effects from impacting core wilderness values. The area is remote and usage is very low. The deleted area has lower (but not low) wilderness value but plays a vital role as a buffer zone. See above for BLM rationale for controlling ORV. If no real problem exists, don't fix it.

Conflict # 6: Potential ORV abuse in northern portion.




BLM Resolution: In the BLM preferred alternative the resolution is to delete about 5600 acres. In the wilderness emphasis alternative the solution is to add about 2000 acres to the WSA increase manageability and solitude. The latter is better because the area to the NW and adjoining the WSA along the lower reaches of Cold Spring Canyon is part of the Blue Eagle WSA which has been preliminarily recommended as suitable in the Tomapah Draft EIS. Including this area improves manageability of both WSAs greatly by eliminating a huge reentrant into the wilderness areas. The wilderness emphasis alternative should be adopted for this conflict.

Summary: The Wilderness Emphasis Alternative area with the restoration of approximately 7360 acres on the western tip of the USA, should be recommended as suitable for designation as wilderness. There are no documented, substantial, unmitigated conflicts with this action.

139

Comment Letter 72

WILDERNESS ALTERNATIVES

- ALL
-  PREFERRED
-  EMPHASIS
-  ADDITIONAL PROPOSED



MAP 3
RIORDAN'S WELL
NV-040-166

Comment Letter 72

South Egan Range WSA (NV-040-16R)

Size: 96916 acres

Naturalness: Very natural condition, particularly in the high country. The center of the unit has some impact of cherry stem roads and range improvements.

Solitude: Outstanding opportunities are present in most of the WSA. Topographic Screening: Excellent with rugged mountains and cliffs. Vegetative Screening: Excellent in the high country.

Primitive Recreation: Outstanding opportunities for recreation. Strongly supported by the Nevada Division of State Parks. Hiking, hunting, nature study, horseback riding, rock and technical climbing and spelunking are excellent.

Special Features: Archaeological sites, Angel Cave, bristlecone pine, Gambel's quail, elk, raptors and massive limestone cliffs are of interest.

Manageability: The area is said to be manageable as wilderness under either the Wilderness Emphasis or Wilderness De-emphasis Alternatives.

Energy: Oil and Gas: Low potential - exploratory wells have shown no commercial shows of oil or gas
Geothermal: Low potential

Minerals: No active mining in the WSA
802 acres of "high" mineral potential (BLM)
7633 acres of "moderate" mineral potential (BLM)
Remainder of WSA has a low potential for minerals
Non metallic mineral potential high in the Ellison District (BLM)

Forestry: 15000 acres is manageable woodland 3% of Egan RA resource

Economic Impact: Negligible beneficial or adverse impacts on all segments of economy.

Conflicts Perceived by BLM:

Conflict # 1: Withdrawal of 802 acres of "high" mineral potential represents an adverse impact to the mining community

Comment Letter 72

BLM Resolution: Exclude this area from acreage recommended suitable

102 Comment: The potential assigned here should be "good". The Ellison District has only very small mines none of which were large producers. All of the rich oxidized surface ore has been mined out and drilling by a major company revealed no new reserves. This is the definition of "good potential" in the WTR Glossary. The area has been excluded under the Wilderness Emphasis and De-Emphasis Alternatives. I concur.

Conflict # 2: Withdrawal of 7633 acres of "moderate" mineral potential represents a significant adverse impact on the mining community

BLM Response: Exclude all but 4300 acres of this area under either the Emphasis or De-Emphasis Alternatives.

103 Comment: The proper mineral potential classification for this acreage is "speculative." There are no known mineral occurrences or even particularly favorable geology. Past mining is some miles away. No models even predict economic deposits here. All the known ore controls are well to the north. Mining of a non-existent resource will not extend into this 4300 acre area.

Conflict # 3: Potential OVR management problems on cherry stem roads into the interior-particularly in the Sheep Pass Canyon Area.

BLM Resolution: Condemn the entire WSA and deem the entire WSA unsuitable for designation under the Preferred Alternative.

96 Comment: The BLM resolution of this conflict cannot be justified by documentation. Under the Wilderness Emphasis Alternative there are no remotely significant conflicts with anything but ORV manageability. Even the De-Emphasis Alternative found the "impenetrable" 16000 acres in the north acceptable! The de-emphasis alternative finds any resource conflict significant and throws the area out.

As to ORV manageability, the BLMs own study found no current significant impacts and therefore no current need of remedies to ORV abuse. How then can an entire WSA, two-thirds of it inaccessible to ORVs be thrown out on the basis of potential ORV abuse! The solution is very close at hand in any event. Should ORV abuse actually occur then BLM has the authority and the obligation to restrict OVA access under either the IMP or Wilderness Management Program. The penetrating roads can be closed to all but permittees and BLM vehicles. This can be done easily where the roads enter the narrow defiles to breach the ridge.

BLM claims there is no current abuse and that none is anticipated in the RA. The remedy for potential abuse is readily at hand and is inexpensive. Measures were outlined

Comment Letter 72

in the general comments about deliberate ORV trespasses. This is a bogus excuse for the reduction of Wilderness acreage. Very real concerns affect much of the acreage removed from the WSA under the Wilderness Emphasis Alternative. This reduction can perhaps be justified. The obliteration of the WSA cannot!

The Wilderness Emphasis Alternative should be adopted (with roads closed to all but permittees if necessary). The 57,660 acres should be recommended to Congress as suitable for Wilderness Designation.

Comment Letter 72

WILDERNESS ALTERNATIVES
— ALL
[---] PERMITTED
[---] EMPHASIS

MAP 4
SOUTH EGAN RANGE
NV-040-168



Comment Letter 72

Goshute Canyon WSA (NV-040-015)

Size: 35,594 acres

Naturalness: One would perceive the WSA to be in a natural condition

Solitude: Outstanding

Topographic Screening: Excellent. The mountains are steep, rugged and dissected with many canyons
Vegetative Screening: Good-mostly mixed conifer and pinyon/juniper forest cover on mountains

Primitive Recreation: Outstanding-splunking in Goshute Cave, fishing for Utah cutthroat trout, hunting deer and grouse, high scenic qualities, nature photography, hiking, camping, backpacking and winter sports

Special Features: Outstanding scenery, bristlecone pine, wild horses, archaeological sites, Goshute Cave, elk, spotted bats, Utah cutthroat trout, Goshute Canyon Natural Area

Manageability: Said by BLM to be manageable under the Preferred Alternative covering 22,225 acres or under the Wilderness Emphasis Alternative

Energy:

Oil and Gas - potential is low
Geothermal - low except in extreme SE

Minerals:

5731 acres classified as "high" mineral potential by BLM and 18,733 acres of moderate mineral potential including a jasperoid prospecting target
The remainder has a low mineral potential

Forestry: 5600 acres of manageability (1.2% of RA resource)

Economic Impact: Negligible favorable or adverse all segments

Conflicts Perceived by BLM:

Conflict # 1: Withdrawal of 5731 acres of "high" mineral potential would constitute a significant adverse impact on the mining community

BLM Resolution: Withdraw this area from the acreage deemed "suitable" under all alternatives other than all wilderness

Comment: The area under discussion contains no working mines, past mines or current prospects

Comment Letter 72

These were all deleted during the intensive inventory. The 5731 acres are however of "good" potential because they are adjacent to the active mining areas, and have some favorable geologic characteristics, but are at some distance from the producing areas. The subject acreage has only a "good" potential but it should be withdrawn from the suitable acreage.

Conflict #2: There is a jasperoid prospecting target for a disseminated gold deposit in the south central portion of the WSA.

BLM Resolution: This prospect has been thoroughly explored and drilled and an exploitable deposit was not found and the claims were dropped.

Comment: The area can now be safely assigned a potential value of "speculative" at best, not the "good" or "moderate" values assigned by the BLM. The exploration has shown that an economic deposit is not there with considerable confidence. I concur that the presence of the jasperoid can be ignored in this case.

Conflict # 3: Withdrawal of 18,733 acres of moderate mineral potential represents a significant adverse impact to the mining community.

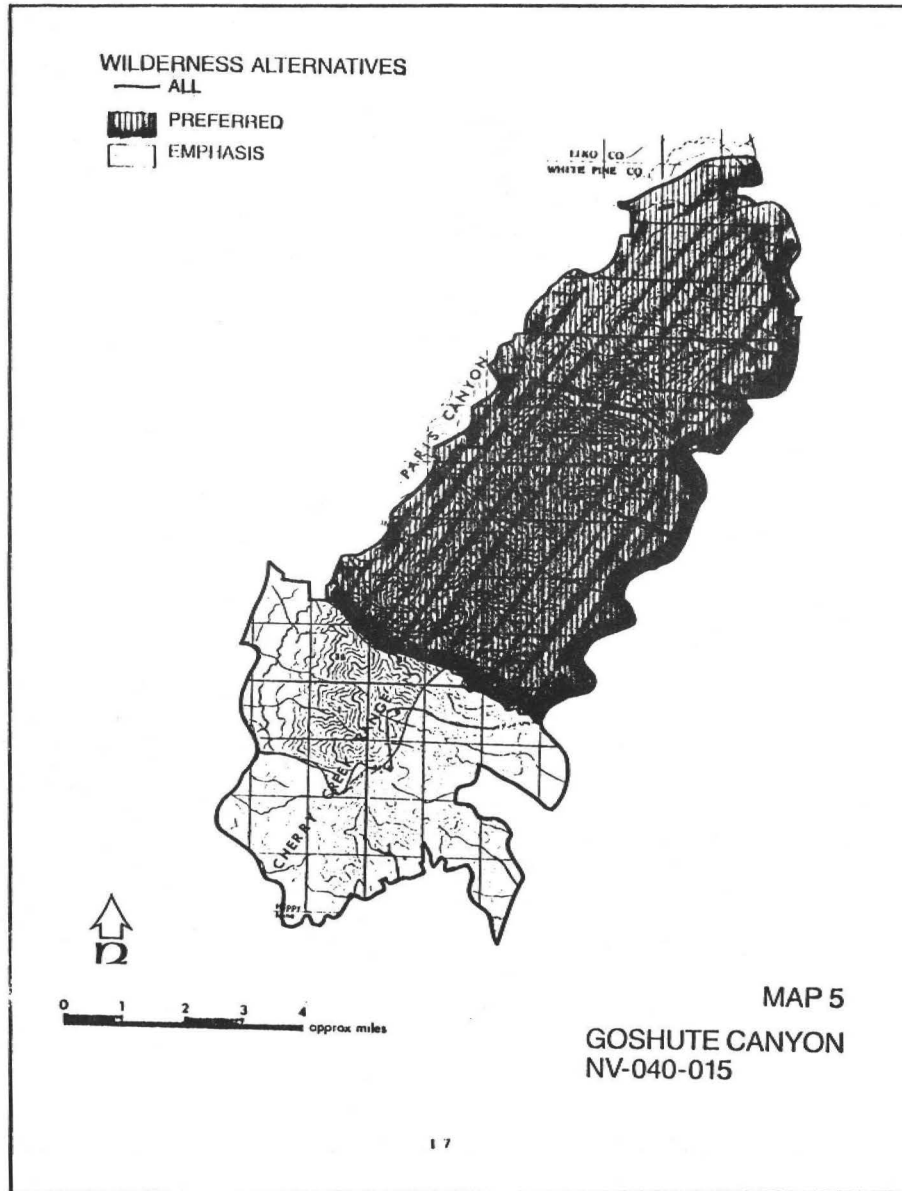
BLM Resolution: Withdraw the southern portion (13,369 acres) from the area recommended as suitable under the Preferred Alternative and 8500 acres in the southern portion in the Wilderness Emphasis Alternative.

Comment: The subject acreage is far removed (up to 5 miles) from the active mining properties. The specific ore controls important within the Cherry Creek District are well known and have been essentially explored. These controls do not extend into the area in question. At best this acreage should have a "speculative" potential rating and some if not all should be restored to the acreage found "suitable."

Conclusions: Approximately 8500 acres in the southern portion of the WSA should be withdrawn because of mineral conflicts. The remainder of the WSA has been found to be manageable under either the Preferred or Wilderness Alternatives. Exclusion of this area essentially removes all conflict of potential economic mineral production. No acres of genuine "high" or "good" mineral potential as defined in the Glossary of the WTR remain in the area proposed as suitable. As a result, the amended Goshute WSA (less the 8500 acres mentioned above) should be recommended to Congress as suitable for Wilderness designation.

Comment Letter 72

Comment Letter 72



Summary

Portions of all four WSAs should be recommended as suitable for Wilderness Designation. There are:

Goshute Canyon WSA (NV-040-015)	27,094 acres
Park Range WSA (NV-040-154)	46,831 acres
Riorden's Well WSA (NV-404-166)	53,091 acres
South Egan Range WSA (NV-404-168)	57,660 acres
Total	184,676 acres

In the 185,000 acres more or less there are no substantiated unmitigated significant adverse impacts. There are no "high" or "good/moderate" mineral potential lands in the proposed acreage and therefore no significant adverse impact on the mining community. There are no ORV management problems which cannot be simply remedied. In short, on this acreage, there are no overriding conflicts and these portions of the four WSAs must, according to the law, be suggested to Congress as suitable for designation as Wilderness Areas under the National Wilderness Preservation System.



THE STATE OF NEVADA
EXECUTIVE CHAMBER
CARSON CITY, Nevada 89710

January 9, 1984

RECEIVED

TELEPHONE

Merrill L. DeSpain, District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

Thank you for providing the Draft Egan Resource Management Plan and Environmental Impact Statement for our comment. The Resource Management Plan deals with a variety of issues and uses relating to the Bureau of Land Management lands within the resource area; however, at this time, this comment is specifically on the wilderness study areas considered in the document.

You should have already received comments from various state agencies representing their specific concerns with each area. I hope you find these informative and useful. Because the various state agencies are given different mandates and have different concerns, their evaluations and comments may understandably vary.

I have asked the various state agencies to work with my office to develop a consensus position for the wilderness study areas in the Egan Resource Area. These agencies were the State Department of Agriculture, Conservation and Natural Resources, Minerals and Wildlife. The State's position is based upon information provided by the Bureau of Land Management, the State's knowledge of the resources and attributes of each area, and concerns presented by the general public.

Park Range (NV-040-143) - This is a very scenic area having outstanding primitive recreation opportunities and wilderness qualities. The area is isolated and has very few resource conflicts apparent at this time. I concur with the Preferred Alternative which proposes the area to be continued to be considered for wilderness designation.

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Riordan's Well (NV-040-166) - The wilderness values in this area do not seem to be substantial or of special significance. Portions of the area are isolated and do have scenic value; however, many roads extending into the area compromise the solitude that may be found. Mineral values are noted within the area. This area should not be further considered as a potential wilderness area.

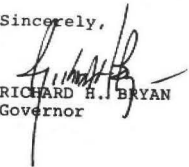
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South Egan Range (NV-040-168) - This area does have some limited portions which can be considered to have high wilderness qualities; however, the values of these limited areas are outweighed by the mineral potential and other resource values found throughout the range. Numerous roads and ways further detract from the limited wilderness characteristics present. I concur with the preferred alternative which proposes the area to be not further considered for wilderness designation.

Goshute Canyon (NV-040-015) - Much of the study area does have wilderness qualities worthy of further consideration of wilderness designation. The highest wilderness qualities are found in the northern portion of the area and within the area presently designated as a natural area. The portion of the study area south of the natural area contains high mineral values and should remain open to mineral exploration and development. I support continued wilderness consideration for the area included in, and north of, the area now designated as a natural area.

The State appreciates the opportunity to comment on your study. We urge you to consider carefully the concerns of the State and the local units of government in your continued review.

Sincerely,


RICHARD H. BRYAN
Governor

RHB/sc

Comment Letter 74

STATE CLEARINGHOUSE
FEDERAL IMPACT
REVIEW PROGRAM

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAMS, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

- | | | |
|--|--|--|
| <input type="checkbox"/> Governor's Office | <input type="checkbox"/> Labor Commission | |
| <input type="checkbox"/> Attorney General | <input checked="" type="checkbox"/> Legislative Counsel Bureau | Conservation and Natural Resources |
| <input type="checkbox"/> Administration | <input type="checkbox"/> Library | |
| <input checked="" type="checkbox"/> Agriculture | <input type="checkbox"/> Prisons | <input checked="" type="checkbox"/> State Lands |
| <input type="checkbox"/> Commerce | <input type="checkbox"/> Public Service Commission | <input type="checkbox"/> Conservation Districts |
| <input type="checkbox"/> Community Services | <input type="checkbox"/> Taxation | <input checked="" type="checkbox"/> Environmental Protection (Lew Dodgion) |
| <input type="checkbox"/> State Job Training Office | <input checked="" type="checkbox"/> [Redacted] | <input checked="" type="checkbox"/> Forestry |
| <input type="checkbox"/> Economic Development | <input checked="" type="checkbox"/> UNR-Bureau of Mines | <input checked="" type="checkbox"/> Hist. Preservation & Archeology |
| <input type="checkbox"/> Education | <input checked="" type="checkbox"/> UNR-Dept. of Range, Wildlife, and Forestry | <input checked="" type="checkbox"/> State Parks |
| <input checked="" type="checkbox"/> Employment Security Department | <input checked="" type="checkbox"/> Wildlife (William Molini) Director | <input checked="" type="checkbox"/> Water Planning |
| <input type="checkbox"/> Dept. of Minerals | | <input type="checkbox"/> Water Resources |
| <input type="checkbox"/> Equal Rights Commission | | |
| <input type="checkbox"/> Human Resources | | |
| <input type="checkbox"/> Indian Commission | | |

FROM: Linda A. Ryan, Director

SAI NV # 84300018 PROJECT: EGAN DRAFT RMP/EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

- 1) the program's effect on your plans and programs;
- 2) the importance of its contribution to State and/or areawide goals and objectives;
- 3) its accord with any applicable law, order or regulation with which you are familiar and/or
- 4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 12/14/85. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

- | | |
|--|--|
| <input type="checkbox"/> No comment on this project | <input type="checkbox"/> Conference desired (see below) |
| <input checked="" type="checkbox"/> Proposal supported as written | <input type="checkbox"/> Conditional support (outlined below) |
| <input checked="" type="checkbox"/> Additional information (see below) | <input type="checkbox"/> Disapproval/denial of funding (must specify reason below) |

Comments (use additional sheets if necessary)
In relation to short and long term goals of the Nevada Department of Transportation the selection of any of the proposed alternatives stipulated with the "Egan Resource Area Resource Management Plan" would not impact current or future intentions of this Department. However, as a courtesy, should an alternative be selected in which grazing allotment fence would be constructed so as to intersect or run adjacent to a State Interest Highway to please notify this agency. The reason being to monitor auto/cattle accidents at these locations for possible corrective measures, should a hazard be identified. If the above condition is met please notify Mr. Frank Page, Chief Safety Engineer at the Headquarter's address.

Linda A. Ryan
Reviewer's Signature Transportation Analyst IV (NDOT) 885-3461 12/14/85
Title Phone Date

Comment Letter 74

STATE DEPARTMENT OF AGRICULTURE
JOHN H. PAETZ, CHAIRMAN
STEPHEN H. BOUGON
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ARLE W. ANNEHRUNG, D.V.M., DIRECTOR
NEVADA ANIMAL INDUSTRY
CHARLES E. BARKINLETT, DIRECTOR
NEVADA STATE INDUSTRY
STEPHEN J. MAHONEY, DIRECTOR
NEVADA BRAND INSPECTION

STATE OF NEVADA
DEPARTMENT OF AGRICULTURE
350 CAPITOL BUILDING AVENUE, RENO, NEVADA 89501
MAILING ADDRESS: P.O. BOX 1100, RENO, NEVADA 89501
TELEPHONE (702) 789-0180

November 30, 1983

Office of Community Services
1100 E. Williams, Suite 109
Carson City, NV 89710

SAI # 84300018 - Egan Wilderness Technical Report/Egan Draft RMP/EIS

We appreciate the opportunity to comment on the Draft Egan Resource Management Plan and Environmental Impact Statement and the Egan Wilderness Technical Report. The Nevada Department of Agriculture comments and recommendations are as follows:

The proposed RMP for the Egan Resource Area is a long-term proposition. Over the 20-year span envisioned in the plan, many changes will occur in BLM personnel, Ranch ownership and management, local needs, local economy, national emphasis and priorities, etc. It is our recommendation that a Stewardship Committee be established to provide long range objectivity, direction, continuity, stability, flexibility, and local acceptance to resource management in the Egan Resource Area.

107 Corridors: Designate reasonable width transportation and utility corridors along existing rights-of-way. Require use of these corridors for future developments wherever feasible. Livestock grazing and Desert Land Entry should be allowed in the corridors where feasible.

Wilderness: Implement Alternative "A" with respect to wilderness area action.

62 Livestock Grazing: The three year average use levels in every management zone within the proposed resource area are well below the preference levels indicating the concern of the livestock operator to protect the range resource. Top priority should be given to range improvement to increase usable livestock forage. Monitoring must be of the highest quality to guarantee maximum efficient use of available forage while at the same time ensuring range improvement. AUM's should be adjusted regularly to reflect range conditions. To limit grazing to the three year average for an undetermined period of time may not provide for efficient forage use.

Comment Letter 74

Community Services
Page 2
November 30, 1983
SAI #84300018

109

Review the categorization procedure described in the document and after consultation with the livestock operators, re-categorize the allotments, placing greater emphasis on range condition, trend and productive potential and on the desires of the livestock operators.

Develop grazing plans for those allotments where extensive improvements and/or grazing systems are needed and practical, and where the livestock operators are willing to participate.

Wild Horses: Reduce and maintain horse numbers to 1971. Do not allow horses to extend into areas where they did not exist prior to 1971.

Wildlife: Wildlife should be maintained and protected without adversely affecting the livestock interests.

88

Selective Management (M-I-C): It is our experience that no allotment is totally uniform and so it is a matter of judgement when they are placed in the different M, I, and C categories. It is recognized that there is room for improvements on every allotment. Therefore, we recommend that placement of allotments in one of the categories should not be inflexible. Where the livestock operator objects or wishes to have it in a different category, his reasonable desire should be allowed.

Sincerely,


Thomas W. Ballou
Executive Director

TWB:L

146

Comment Letter 74

STATE OF NEVADA

ROLAND D. WESTERGARD
State Historic Preservation Officer



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY

201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 885-5136

December 8, 1983

MEMORANDUM

TO: John Walker, Office of Community Services

FROM: Alice M. Becker, Staff Archeologist 

SUBJECT: EGAN DRAFT RMP/EIS, SAI NV#84300018

The Division participated with other state agencies in commenting on the BLM's proposed wilderness designations for the Egan Resource Area. Our comments in general are included with those to be submitted by the state of Nevada. However, we would also like to communicate our concern for cultural resources in several areas.

110

First, there is a need for further investigation of archeological sites associated with the pristine mountain meadows in the Park Range. Although these sites will receive added protection from wilderness designation, we feel they merit study for a more complete understanding of regional pre-history.

111

In regards to the South Egan Range, numerous archeological sites have been located. Because the area was not recommended for wilderness designation, some form of additional protection may be necessary if development accelerates in the near future.

112

The Resource Management Plan/EIS does not adequately describe cultural resources in the chapter on affected environment. In accordance with the Rangeland PMA between the BLM and the Advisory Council dated January 14, 1980 reference must be made of existing Class I and II inventory reports identifying historic and cultural properties. This information should be included in the final RMP/EIS.

If there are any questions regarding these comments, BLM staff is encouraged to contact us.

AMB/lmw

Comment Letter 74

Division of State Lands
State Land Office
State Land Use Planning Section
1000 S. 11th



Address Reply to
Division of State Lands
200 S. 11th Street
Capital Complex
Carson City, Nevada 89701

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

December 15, 1983

Merrill L. DeSpain
District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

SUBJECT: Comments on Egan Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. DeSpain:

After reviewing the Egan Draft Resource Management Plan and Environmental Impact Statement and attending all the public hearings held regarding the plan and EIS, we would like to offer the following comments:

1. The three year average licensed use of 123,461 AUM's for livestock grazing levels is considerably lower than 216,348 AUM active grazing preference for the entire area. It is generally agreed that since the three year average licensed use represents actual livestock use in the area, little adverse impact would be noted for most of the livestock operators in the area. Our concern is with the livestock operators whose three year average use is lower than a reasonable stocking rate for their allotment. These reduced numbers may have occurred for a variety of reasons, some not related to forage conditions. We would recommend that the three year licensed use be used as a general guide in establishing stocking rates on which monitoring will be based. For those livestock operators who have been running less livestock in the past three years for reasons unrelated to forage availability, we suggest that BLM work with this limited number of operators to establish a stocking rate which would be more equitable. This would avoid unfairly penalizing a few operators who happened to have had herd levels less than what they reasonably could have had during the past three years. We recognize that a proper monitoring program should allow for upward adjustments for these operators; however, these adjustments under the process proposed, will not be implemented until after monitoring is well underway. This will still unfairly penalize some of the operators who have reduced herd levels.

The actual implementation of fair stocking rates to be used as a basis for monitoring could be established through a coordinated resource management planning process, if all participants are agreeable to using the process.

70

147

Comment Letter 74

Merrill DeSpain
December 15, 1983
Page 2

40

2. We question how a significant increase in wild horses (page 99 under the preferred alternative) will be a beneficial impact. Wild horse numbers are far too high in many areas of the state, including the Egan Resource Area, and considerable effort and money is being expended in trying to reduce these already high wild horse populations. A proposal to reduce wild horse levels, perhaps to 1971 levels, should be proposed in the preferred alternative, instead of retaining the unreasonably high population levels now found in the area.

113

3. The Plan and EIS fail to address the possible impacts that may occur if the White Pine Power Project is implemented. The preferred site for the power plant is in Steptoe Valley north of Ely. If this plant is constructed, it will have impacts on the Goshute Canyon WSA, land disposal proposals, potential irrigated agricultural land entries in Steptoe Valley, loss of AUM's for livestock, wild horses, and wildlife, recreation and utility corridors. We suggest that these potential impacts be addressed in the plan and EIS.

4. For wilderness study areas included in the planning area, we offer the following evaluations and recommendations:

105

- A. **Park Range (NV-040-143)** - We concur with the preferred alternative which proposes the Park Range be further considered as a potential wilderness area. The WSA is a very natural area which has excellent wilderness values. These values, coupled with the fact that few resource conflicts are evident and the area appears to be manageable as a wilderness, make this area worthy of further wilderness consideration.

48

- B. **Riordan's Well (NV-040-166)** - The area should be dropped from further consideration as a wilderness area. Some portions of the area have potential mineral resource conflicts and other portions are adversely impacted by many ways and cherrystem roads. The area, also, lacks significant wilderness qualities and opportunities for solitude and primitive recreation experiences.

106

- C. **South Egan Range (NV-040-168)** - The area should not be further considered for wilderness designation. Portions of the area do contain outstanding wilderness characteristics; however, much of the area is adversely affected by the intrusions of man through cherrystem roads and numerous ways which nearly divide the area into many small segments. Resource conflicts, primarily mineral potential, are significant throughout the study area. The many multiple use benefits that can be realized from the area outweigh its potential as a wilderness area.

- D. **Goshute Canyon (NV-040-015)** - The area contains high wilderness values and unique features which seem to qualify some of the area for further wilderness consideration. The best areas for wilderness are located in the northerly portion of the WSA. We support continued consideration for wilderness for the area north of the southerly boundary of the designated natural area. The portion of the WSA south of this line contains high mineral values and should remain open to mineral exploration and development. We are concerned, however, that the proposed power plant, with its preferred site close to the WSA, could adversely affect the wilderness values, and vice-versa, the proximity of the WSA could adversely influence the power plant proposal.

Comment Letter 74

Merrill DeSpain
December 15, 1983
Page 3

- 33 | 5. On a small matter that appears to be an oversight, we note on the preferred alternative map (no page or map number) that a proposed utility corridor is shown extending northeast from Currant to the National Forest boundary. This corridor does not seem to exit the National Forest as it should. We suggest that the map be corrected to show the corridor east of the National Forest.
- 114 | 6. The DEIS for the White Pine Power Project indicates that approximately 2250 acres of public land would go out of public ownership if the plant is constructed, irrespective of the site. On page 100, Table 4-1 should be amended to reflect this possibility under all the alternatives presented.
- 115 | 7. Under Alternative D, on Table 4-1 (page 100) 7,855 acres are indicated for possible disposal for "Grass Seeding (Dryland)," a figure considerably higher than that which is proposed for any of the other alternatives. Discussion of this type of disposal was not found in the EIS. We suggest that this type of disposal be more fully explained. Included in the discussion should be an explanation of why 7,855 acres is appropriate for this alternative and only 712 or 913 acres are considered for disposal for this class in the other alternatives.

We thank you for the opportunity to participate in the planning for the Egan Resource Area and hope our comments and suggestions are useful to you.

Sincerely,

Pamela B. Wilcox
Administrator

PBW:jMD:js

148

Comment Letter 74

RICHARD H. BRYAN
Governor

STATE OF NEVADA



DEPARTMENT OF MINERALS
400 W. King Street, Suite 100
Carson City, Nevada 89710
(702) 885-5050

December 7, 1983

Mr. Merrill L. DeSpain
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. DeSpain:

The Nevada Department of Minerals appreciates the opportunity to review and comment on the Draft Egan Resource Management Plan and Environmental Impact Statement (SAI NV # 84300018). Our agency is particularly interested in issues associated with minerals and energy development, since related decisions could have long lasting effects on the mineral industry in the State.

116 | The Nevada Department of Minerals has several concerns relative to the Egan Resource Management Plan and Environmental Impact Statement. Of primary concern is the proposal to close several sections of land in which there currently is or has been mining or exploration activity. Many of these areas also have favorable potential for geothermal development and include sections of lands currently under oil and gas leases. The department is also concerned about the designated mineral potential as stated in the draft document. We feel that the rating system to evaluate mineral potential is inaccurate and biased since a high rating only recognizes past mineral activities. We believe that an area's true mineral potential can never be fully known until actual mining and exploration occurs. In many cases, major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seems to have little or no mineral potential into a prime exploration target.

117 | The Department recommends that wilderness study areas should only be considered if an area has no mineral resource potential; that is, areas with sufficient geologic data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

Comment Letter 74

Page Two
December 7, 1983
Egan Wilderness Comments

Furthermore, the department feels that if any area with favorable mineral potential is to be recommended for wilderness, it should only be because: 1) There are no alternate sites with no mineral potential, or 2) An intensive U. S. Geologic Survey or U. S. Bureau of Mines study has been conducted at a sufficient level of detail to reclassify the area as having no resource potential.

Generally, the department found the draft document to be well written and easy to understand. Your staff should be complimented on these efforts concerning both data collection and compilation.

For clarification purposes, please find listed below our specific comments on each of the four Wilderness Study Areas identified in the Egan Resource Area.

108

Park Range-The moderate geothermal potential on both the western and eastern edge of the WSA along with the possibilities of favorable metallic mineral resources presents resource conflicts that the department feels outweighs the wilderness value in the area. Therefore, the department recommends that the entire area not be considered for wilderness since all alternatives, except no wilderness, would have a significant adverse impact on mineral and energy development in the area.

105

Rfordan's Wells-The Nevada Department of Minerals recommends that the entire area not be considered for wilderness due to the numerous oil and gas leases in the area along with moderate mineral potential in the southern half of the WSA. The numerous mining claims in the central sections of the WSA indicates that favorable mineral potential may occur in areas not designated in the draft document. The Troy mining district, which is located southeast of the WSA was very active during past years with recorded production of gold valued at approximately 1 million dollars. The Terrell Mine, which produced tungsten, is located just outside the southern edge of the WSA. The department feels that all alternatives, except no wilderness, would have a significant adverse impact on mineral and energy development in the area.

South Egan Range-The Nevada Department of Minerals supports the preferred alternative for this Wilderness Study Area.

106

Goshute Canyon-The Nevada Department of Minerals strongly recommends that the entire area not be considered for wilderness due primarily to excellent mineral potential and consequent resource conflicts which exist in the area. The Goshute Canyon WSA is very close to the historic mining town of Cherry Creek. The Cherry Creek mining district, which recorded millions of dollars in production, extends into the WSA. Minerals produced in the Cherry Creek mining district include gold, silver, lead, copper and tungsten. Nevada's only known coal deposits are located in Paris Canyon on the western edge of the WSA. The coal deposits, only a few feet thick in many areas, have been of interest to the mineral industry for many years.

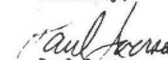
Comment Letter 74

Page Three
December 7, 1983
Egan Wilderness Comments

Goshute Canon (cont.)-Paleozoic sedimentary rocks cropping out in the center of the WSA are the same formation type as the host rock which is currently being mined for gold and silver at the Alligator Ridge Mine. The Jasperoid rocks located in the center of the WSA are of extreme interest to the mineral industry since Jasperoids are a target material for Carlin-type gold deposits. The department feels that all alternatives, except no wilderness and wilderness de-emphasis, would have a significant adverse impact on mineral and energy development in the area.

As a closing statement, the Department of Minerals does value preserving some public lands for future generations and scientific study, as long as the mineral industry, which is so essential to our national defense and the State's progressive economy, can remain healthy and be provided the opportunity to pursue new mineral resources.

Sincerely,


Paul Averson
Deputy Director

PI/kc

cc: Edward F. Spang, State Director
Linda Ryan, Office of Community Services, State Clearinghouse Program

Comment Letter 74

NEVADA BUREAU OF MINES AND GEOLOGY
MACKAY SCHOOL OF MINES
UNIVERSITY OF NEVADA • RENO
RENO, NEVADA 89557-0088

(702) 784-6881

13 December 1983

EGAN DRAFT RMP/EIS, EGAN WILDERNESS TECHNICAL REPORT

As described within the preferred alternative management plan, boundary of the Goshute wilderness study area includes an area with inferred high mineral potential along the south and eastern margins of Paris Canyon. There is considerable claim staking activity here, and there may be potential for the discovery of disseminated gold deposits in this area. Rocks outcropping along the upper reaches of Paris Canyon include the Mississippian Chainman Shale and Joana Limestone. This group of rocks forms the host horizon for the disseminated gold deposit at Alligator Ridge in the southern Ruby Range to the west. Pennsylvanian-Permian rocks on the northwest side of Paris Canyon contain one of the few coal deposits in the State of Nevada. Old workings on the coal seam indicate that some coal has been mined here.

150

Comment Letter 74

RICHARD BOYAN
GOVERNOR



DIVISION
OF
STATE
PARKS
JOHN RICHARDSON
~~JOHN RICHARDSON~~
Administrator

SUITE 210
1923 N. CARSON ST.
CAPITOL COMPLEX
CARSON CITY,
NEVADA 89710
(702) 885-4884

Mailing Address:
Capitol Complex
Carson City
Nevada 89710

In Reply Refer to

October 21, 1983

Merrill L. DeSpain
District Manager
Star Route 5, Box 1
Ely, Nevada 89301

Dear Merrill,

We have reviewed the Egan Draft of the Resource Management and the Environmental Impact Statement.

We feel that a modified version of the Bureau's Preferred Alternative would be beneficial to the recreational interests of the State of Nevada.

2 We suggest that the South Egan Range not be dropped from Wilderness Designation. Instead we feel that a compromise can be made by modifying the acreage to eliminate part of the conflicts, while protecting the most significant natural, geological, and biological aspects within the South Egan Range.

If the South Egan Range can not be included in the Preferred Alternative, we would support Alternative B.

I would be happy to meet with you to discuss our concerns and recommendations.

Sincerely,

John Richardson
Administrator

JR:km

Administration: (702) 885-4884
Operations and Maintenance: (702) 885-4887
Planning and Development: (702) 885-4370

a division of the Department of Conservation and Natural Resources
Roland D. Westergard, Director

Comment Letter 74

STATE CLEARINGHOUSE
FEDERAL IMPACT
REVIEW PROGRAM

RECEIVED

SEP 16 1983

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

ENVIRONMENTAL
PROTECTION

- TO:
- Governor's Office
 - Attorney General
 - Administration
 - Agriculture
 - Commerce
 - Community Services
 - State Job Training Office
 - Economic Development
 - Education
 - Employment Security Department
 - Dept. of Minerals
 - Equal Rights Commission
 - Human Resources
 - Indian Commission
- Labor Commission
 - Legislative Counsel Bureau
 - Library
 - Prisons
 - Public Service Commission
 - Taxation
 - Transportation
 - UNR-Bureau of Mines
 - UNR-Dept. of Range, Wildlife, and Forestry
 - Wildlife (William Molini) Director
- Conservation and Natural Resources
 - State Lands
 - Conservation Districts
 - _____ (Lew Dodgion)
 - Forestry
 - Hist. Preservation & Archeology
 - State Parks
 - Water Planning
 - Water Resources

FROM: Linda A. Ryan, Director

SAI NV # 84300018 PROJECT: EGAN DRAFT BMP/FIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

- 1) the program's effect on your plans and programs;
- 2) the importance of its contribution to State and/or areawide goals and objectives;
- 3) its accord with any applicable law, order or regulation with which you are familiar and/or
- 4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 15. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

- No comment on this project
- Proposal supported as written
- Additional information (see below)
- Conference desired (see below)
- Conditional support (outlined below)
- Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

AIR-Dick Serdoz: No comment.

WATER-Steve Weaver: DEP is opposed to a alternatives which would lead to degradation of riparian habitat or rangeland vegetative cover, especially where it may impact perennial streams, lakes or reservoirs. Improved riparian habitat and increased vegetative cover, which would improve water quality by decreasing sediment loads, is preferred. Alternatives A&D appear to be unsatisfactory in these respects, while alternatives B&G are the most satisfactory.

SOLID WASTE-Verne Rosse: No comment.

L. W. Dodgion/Kga
Reviewer's Signature

Administrator
Title

885-4670
Phone

11/03/83
Date

Comment Letter 74



STATE OF NEVADA

ADDRESS REPLY TO:

DIVISION OF WATER PLANNING
2015 FALL STREET, NYE BLDG.
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710

TELEPHONE (702) 885-4380

December 14, 1983

TO: Office of Community Services - Federal Impact Review Program
FROM: Robert E. Walstrom, Hydraulic Engineer III
SUBJECT: SAI NV # 84300018, Egan Wilderness Technical Report

The Division has finished its review of this document and would make the following comment:

42

On page 36 of the report it might be noted that under the heading Water Quantity the Steptoe Valley was Designated by the State Engineer in 1983 and thus the ground water basin is fully appropriated except for rare cases.

[This document review is due 12-15-83]



STATE OF NEVADA
 ADDRESS REPLY TO:
 DIVISION OF WATER PLANNING
 201 S. FALL STREET, NYE BLDG.
 CAPITOL COMPLEX
 CARSON CITY, NEVADA 89710
 TELEPHONE (702) 885-4380

December 14, 1983

TO: Office of Community Services - Federal Impact Review Program
 FROM: Robert E. Walstrom, Hydraulic Engineer III *Robert E. Walstrom*
 SUBJECT: SAI NV # 84300018, Egan Draft RMP/EIS

The Division has reviewed this document and wish to make the following general statements:

118 Under the heading of Realty Management in all alternatives are listed large acreages to be disposed of to the private sector. It is suggested that the first priority, when considering disposing of public lands, be exchange of lands. The second priority should be competitive sales and the third direct sales to public entities and private parties. The reasons for these priorities is to retain as much land in public ownership as possible. And to block-up private lands as well as public lands for better management.

One suggestion would be to identify private inholdings on public lands and earmark these for possible exchange or purchase (the money coming from sale of other BLM lands). This technique would benefit both the public lands through blocking-up and the private lands for the same reason.

52 In your section on Affected Environment no mention is made concerning water as an affected resource. Any change in the management of other resources (mining, wild horses, recreation etc) would impact on this scarce resource. Most of the surface water is fully allocated in this area and the entire Steptoe Valley and Lake Valley ground water system has been designated by the State Engineer to be a critical area for water. It is suggested that water be added as an affected resource along side of the other resources: land, wildlife etc.

[This document review is due 12-15-1983]



STATE OF NEVADA
 DEPARTMENT OF WILDLIFE
 1100 Valley Road
 P. O. Box 10678
 Reno, Nevada 89520 0022
 (702) 789-0500

WILDLIFE DIVISION

December 13, 1983

Ms. Linda Ryan, Director
 Office of Community Services
 1100 East William, Suite 109
 Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and provide comments on the Egan Wilderness Technical Report which was prepared by the Ely District of the Bureau of Land Management (SAI NV#84300018). Our agency provided some input directly to the BLM on those issues in the form of a completed questionnaire in 1980. Our comments relative to the specific areas in question are as follows:

Park Range - We support the designation of the Park Range as a wilderness area as a means of protecting existing resource values. This remote tract of land has few inroads and is important transitional and wintering habitat for mule deer.

Riordan's Well - Our agency supported wilderness consideration for this area in 1980 with mention that numerous roadways were present in the canyon bottoms and along the alluvial fans. We continue to support wilderness for much of the area as a protective measure for the natural resources but believe that existing access roads should continue to be maintained. Hunter access to the canyon areas is important because of the use of the area as a deer winter range.

South Egan Range - We did not support wilderness consideration for this area since it appears to lack significant natural features. Numerous roads also proliferate the area.

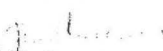
106 | Goshute Canyon - We did not believe that this area provided significant wilderness characteristics because of past development projects within and adjacent to the area. The naturalness and associated opportunities for solitude appear to be limited.

Comment Letter 74

Ms. Linda Ryan
December 13, 1983
Page 2

I hope the above comments will be of value to the Bureau of Land Management in making a final determination as to the wilderness values within the Egan Resource Area. If you have any questions on the above or feel a need for further input at this time, please advise.

Sincerely,


Jim Wenner
Acting Director

RPM:cb
cc: Region II

Comment Letter 74



STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

RECEIVED ON

DEC 23 1983

OFFICE OF
COMMUNITY SERVICES

WILLIAM A. MOULTON
Director

December 21, 1983

Ms. Linda Ryan, Director
Office of Community Services
1100 East William, Suite 109
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and comment on the Draft Egan RMP and EIS document which was prepared by the Ely District of the Bureau of Land Management (SAI NV #84300018).

It appears the Draft Egan RMP and EIS does not present any viable or long-term solutions of how to best manage public lands for all resource values. The primary focus of the RMP appears to center on large expenditures for range improvement projects for the primary benefit of the livestock industry. The benefits to wildlife would result primarily from management actions proposed to improve ecological conditions. We can and do support grazing management programs designed to improve vegetative ecological conditions because good native range conditions do contribute significantly to the overall well being of all wildlife species. However, we do not support the RMP assumption that massive vegetal conversion will contribute any significant amount of forage and habitat for wildlife. We recommend that the RMP address and present objectives to accomplish the following:

1. Design and implement grazing systems to maintain or improve native ranges to a good or better ecological condition.
2. Initiate vegetal conversion only after grazing management programs are implemented and working.
3. Use grazing management, not vegetal conversion, as the primary means to increase AUM's.
4. Manage for reasonable numbers of big game in the short term. Reasonable numbers should be met if native ranges were maintained in a good or better ecological condition.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 2

- 5. Set utilization levels on key wildlife vegetation compatible with wildlife needs.
- 6. Emphasize the need to upgrade and maintain a high level of monitoring for wildlife and livestock.

Only through some strong commitments to manage native ranges in acceptable condition will wildlife realize any substantial benefits from the RMP.

62

The draft states that forage demand is far greater than current forage production on 2,493,000 acres and somewhat to slightly greater on 1,065,000 acres. This would suggest that action must be taken immediately to correct this situation. To authorize use at the three year average license use (123,461 AUM's) would only continue this production/demand shortfall in the short term.

26

The criteria by which objectives for range management are judged is confusing. The draft does not present objectives in terms of ecological condition, but rather in terms of percent acres in desired successional stages. It would be more meaningful and understandable to present vegetational management in terms of desired levels of ecological condition classes. It appears that if these successional levels are reached, ecological condition could still be less than desirable.

60

The emphasis on burning for vegetative conversion is alarming. The preferred alternative proposes to burn 18,500 acres with the assumption that forage will be increased for wildlife. We feel that the overall vegetative impacts on wildlife habitats would far outweigh any positive aspects. Throughout the draft the use of fire as a management objective has been so overemphasized as to practically disregard other management tools.

87

Currently, there are only five allotments, out of 95, which are operating under an AMP. All alternatives state that grazing systems will be implemented. There are no commitments on how many AMP's will be implemented in either the short or long term. It would appear that AMP's are essential to the grazing management objectives and are needed before range improvement projects are initiated.

119

We are concerned about the preferred alternative proposal to manage wild horses at the 1,451 level. We feel this number should be reduced, particularly in areas where horses are in direct competition with wildlife. Our primary concern is in the Buck/Bald herd area where horses are competing directly with deer on key winter range. We recommend that herd numbers be reduced by 74 percent. This is the amount the Monte Cristo herd will be reduced by. We feel that even horse protection groups would not advocate numbers that are serious competitors with wildlife on key ranges.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 3

88

The placement of 76 allotments, out of a resource area total of 93, in the "M" or "C" category does not present a firm commitment to basic vegetative resource improvement. For example, selective management criteria state that in "M" allotments current forage production is near maximum and no change is required in current grazing practices. The designation of 76 "M" allotments would not appear to sufficiently address current problems such as 92 percent of the RA with forage production less than demand, year-round grazing on all allotments, range trend down on 29 allotments, etc. We suggest that a significant number of the "M" allotments be reevaluated and placed in the "I" category.

SPECIFIC COMMENTS

CHAPTER 1

Page 13, Issues and Criteria

89

It is stated there are no areas of critical environmental concern within the Egan RA. Why then does the Standard Operating Procedures address requirements to deal with them? Why were no ACEC's designated or criteria presented to make this determination?

Who makes the determination when single use is in the best public interest?

120

The condition and trend of wildlife habitat should be a major component in the allotment categorization process. The Department of Wildlife should be involved throughout the process.

Page 13, Inventory Criteria

35

The socio-economic value of wildlife should be addressed.

Page 14, Criteria Guiding Development of Alternatives

121

Why does criteria present only a protection or development parameter, the two extremes, when the preferred alternative is supposed to emphasize a balanced approach to land management?

Fire can be recognized as part of the natural ecosystem, but can no longer be considered to produce natural resource values because land use and ecosystems are far from being natural. Under pristine conditions this may be true, but fire in many circumstances will not now restore natural values.

Page 15 Mineral Resources Management

33

The Bureau should at least outline the need and objectives for reclamation of areas disturbed by mining or associated activity.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 4

CHAPTER 2

122

In the discussion on management zones, it is stated that forage demand is greater than current forage production on all but 284,000 acres. No quantification of this demand is presented other than for greater, somewhat greater, or slightly greater. Is there any data available to make a better evaluation?

Page 21, Management Objectives Rationale

60

We seriously question the rationale behind using fire as the primary method of vegetal conversion. In the recent past, fire had significant deleterious impact on wildlife habitat.

Preferred Alternative

We have some serious concerns with the preferred alternative.

62

1. How can initial stocking rates be authorized at the three year average licensed use when forage demand is greater than forage production on 93 percent of the RA? It is not conceivable that range management projects would contribute much to the forage production in the short term. In that interim, forage and resource values would continue to suffer because of excess demand. Livestock numbers should not surpass forage capabilities of the range. We present the Buck/Bald area as an example of this concern.

60

2. Since wildlife is included under the range management issue, we feel wildlife has not been given due consideration in the proposals for range improvements. The conversion of 20,000 acres of sagebrush could be damaging to wildlife. There is no documentation or reference as to what portions of increased forage would be specifically for and available to wildlife. To burn 18,500 acres with the primary purpose of increasing livestock forage without consideration for wildlife is of serious concern to us.

123

3. There is no mention of utilization levels for key browse species on deer winter range. Alternative C at least mentions proper use. Utilization levels must be presented as a management action.

119

4. We do not agree with the proposed management levels of wild horses where there is serious conflict with native wildlife for available forage. We recommend that numbers be reduced below 700 in the Buck/Bald herd area.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 5

29

5. We agree that monitoring efforts must be intensified on riparian areas. If management objectives are not being met through application of management practices, what other option is left but to physically protect these areas? If riparian areas are mandated to be protected and improved to good or better condition by Executive Order, the Bureau must develop some firm management objectives and present them in some quantifiable way. The RMP does not state by areas, percentage or mile how much area will be managed in any stated condition class. The RMP contradicts itself on evaluation of current condition. For example, in the text (Affected Environment) it states Goshute Creek is in poor to fair condition, but Appendix 9 states Goshute Creek is in good condition. This type of discrepancy is not conducive to placing confidence in all stated conditions.

124

6. To manage habitat, even in the short term, for existing levels of wildlife is unacceptable. In fact we have serious reservations that management practices outlined in the preferred alternative are capable of meeting current needs of wildlife, let alone long-term needs for reasonable numbers.

87

7. The RMP states that grazing systems will be implemented. This is fine, but without any goal objectives for number of AMP's and time frames for implementation the commitment is rather weak. The RMP should state how many AMP's, in what time frame, will be implemented.

26

8. What exactly is meant by the statement "all vegetation would be managed for those successional stages which would best meet the objectives of this alternative." We contend this means that vegetation would be managed primarily for livestock because the alternative is almost entirely based on what can be done to benefit livestock.

We recommend that monitoring be used primarily as a basis for livestock adjustments. If monitoring is used largely to justify additional range improvements to bring forage up to stocking rate, then the original intent of monitoring has been largely ignored.

9. We feel that the development of HMP's has not and will not be a major benefit to wildlife based on past experience. For example, the Buck/Bald HMP has been completed for some time but never implemented. If all HMP's were implemented when they were completed they should provide substantial benefits.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 6

11

10. We view the disposal of large tracts of lands as a serious threat to a multitude of resource values. Disposal should be limited primarily to address the expansion needs of municipalities, land for utility projects, and the lack of manageability of small isolated parcels.

Page 25, Alternative A

The management actions we favor are:

1. Complete suppression of wild fires would continue.
2. Land disposal would be considered on a case by case basis.

We do not concur with the remaining management actions.

Page 26, Alternative B

This alternative outlines more management actions that are truly multiple use oriented than any of the alternatives presented. If wild horses would be managed at some realistic figure, this alternative may be supported by a majority of the land users.

The alternative states that "corrective action would be taken to improve these areas where necessary to bring them up to the good condition class." This is possibly the only time a condition class is stated as a goal in the RMP. We believe this objective should be a management action in the preferred alternative.

Page 29, Alternative C

We find this alternative largely unacceptable. However, there are two management actions which are good and we cannot understand why they were not presented in the preferred alternative or other alternatives. These actions are:

91

1. Range projects must have a benefit/cost ratio of 1.0 before being funded.
2. Total utilization will not exceed proper utilization of key species.

Page 32, Alternative D

30

This is the least acceptable of all presented alternatives. Why under this alternative, to maximize resources for livestock, is the action presented to not exceed proper utilization on key species when it is not even mentioned in the preferred alternative?

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 7

Page 35, Alternative E

33

Why would horses be managed at a lower level under no grazing than under Alternative B with 92,308 livestock AUM's?

IMPLEMENTATION OF THE RMP

Page 37, Land Tenure Adjustments

33

The decision to dispose of a particular parcel should consider all conflicts, not just cultural and mineral.

Page 38, Wildlife

We agree that AMP's must be closely coordinated with HMP's. Probably more positive wildlife benefits would be realized through the implementation of good range management of native ranges than through any other means. We do not consider the conversion of native ranges to largely monotypic seedings as good range management where there are identified conflicts with wildlife.

Page 38, Livestock

Grazing treatments should be designed not only to provide forage and maintain proper use levels, but to maintain or improve ecological condition to a good or better condition class.

Page 40, Utilization

123

Is the proposed annual utilization rate of 45 percent for both livestock and wildlife? If this figure is only for livestock, then it must be adjusted downward. We recommend that browse utilization rates for livestock be set at 25 percent of current annual growth on key browse species on deer winter range.

Pages 41-44, Standard Operating Procedures

We suggest the addition of the following standard operating procedures:

125

1. Crested wheatgrass seedings will not be located in key big game habitats.

42

2. Emphasis will be placed on the management of browse on key mule deer winter range.

126

Operating procedure #10 is not entirely clear. Will the Western States Sage Grouse Guidelines be a standard operating procedure?

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 8

127 | What is the criteria for designation of ACEC's? Would key wildlife habitats qualify and if not, why not?

CHAPTER 3, AFFECTED ENVIRONMENT

Page 61, Wildlife - Mule Deer

No mention is made of the mule deer resource in the Diamonds nor of habitat problems on the Ruby herd winter range. However, the summer range problems were discussed for the Egan/Cherry Creek herd.

Page 62, Bighorn Sheep

28 | The RMP should discuss potential introduction sites as they were presented in the 1982 wildlife input report.

Page 62, Antelope

42 | The EIS uses the statement ". . . re-establishing viable pronghorn population in White River . . . Valley." The statement "augmentation of an existing population" would be better as there is an existing antelope herd present in the valley.

Page 63

There is a good possibility that blue grouse exist in the Butte Range.

No mention is made of sandhill cranes in Newark or Steptoe Valleys, nor of the Lund stopover area.

Page 72, Social Analysis

128 | Are "base properties" still required for grazing on federal land?

Page 77, Economic Analysis - Wildlife

35 | We feel the economic analysis for areas other than livestock received only a cursory evaluation. Under wildlife, trapping, fishing, and nonconsumptive uses were not mentioned.

Maps

The big game map is extremely poor in its seasonal use delineation by species. For example, it does not even show deer winter range in the Buck, Bald, Maverick, and Little Antelope summit areas. Nor do the maps show antelope distribution in Railroad Valley, Little Smoky Valley, and others.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 9

Data on upland game maps is incomplete. We recommend the Bureau at their earliest convenience update maps directly from regional maps available at the Region II Elko office and at the Region III office in Las Vegas.

CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

Pages 92-93, Assumptions

This section should include the assumption that demand for wildlife resources, particularly harvestable resources, will continue to increase. For example, the demand for all big game tags far exceeds supply at the present time.

29 | How can riparian and stream habitat presently declining and not proposed for a change in management be allowed to decline at present rates? On page 13 it states that Executive Orders require riparian areas to be administered in good or better condition.

Page 93, Determination of Significant Impacts

Can a significant negative impact be measured when a vegetative community is in poor condition and declining trend?

25 | What is the definition of disruption in #2 under Livestock?

Page 94

The determination of significant impacts on big game should be measured on a herd management area and not on a zone or resource area.

Number 4 under Wild Horses should also be included under the Wildlife section.

15 | Why are the percentage change standards greater for big game than small game and horses?

ENVIRONMENTAL CONSEQUENCES - PREFERRED ALTERNATIVE

Page 97

16 | It appears that if grazing systems and AMP's do increase AUM's, then that increase would best be used to make up the existing deficiencies in forage demand rather than increasing total AUM's. The text states that 92 percent of the area has a forage demand in excess of forage production. We strongly question the adequacy of forage currently provided to wildlife.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 10

125

We can not support the assumption that big game numbers would increase through the implementation of range improvement projects when these projects are primarily created wheat seedings.

There are several questionable assumptions in analyzing the impacts of the preferred alternative:

1. The increase in AUM's will allow operators to eventually increase herd sizes above the three year licensed level. Competition for forage resources in the Buck/Bald area between livestock, wild horses, and wildlife is intense. Heavy utilization of forage plants by livestock and horses during the grazing season leaves little forage for wintering deer. Initiation of the preferred alternative would continue this trend. While grazing systems would be a welcome change from the present "year-long use," we doubt whether grazing systems in conjunction with range improvements will ever logically allow increases in licensed livestock use, particularly in Zone 1. Preference held by livestock operators in the Buck/Bald area far outweigh the area's forage production capabilities. This is a direct result of past conversion ratios when cattle replaced sheep. We feel the Bureau has been negligent in its role to determine appropriate stocking rates for livestock based on forage production capabilities in the Buck/Bald area.

Page 99, Wild Horses

We can not support the proposal to let wild horse numbers increase significantly since they could only do so at the expense of other resources.

119

According to the BLM-USFS report to Congress in June, 1982, wild horses are to be maintained only in areas where the animals existed when the 1971 Act was passed. What measures, therefore, will be taken by the BLM to insure that wild horses will not spread into other areas?

Page 103, Social Analysis

Benefits derived from improvement in wildlife habitat are not mentioned.

158

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 11

APPENDICES

Appendix 1

33

The appendix states that all forage demands for wildlife are being met in Zone 1. We do not agree and this statement is contradicted on page 20 by the statement that forage demand is far greater than forage production.

33

Apparently the statistics for Zone 5 were left out and the statistics given for Zone 5 is the total for all zones except those given for the range improvement projects.

33

The reasonable number of wildlife AUM's does not compare with the total Egan RA reasonable number AUM's presented to the Bureau in the 1982 Egan RA Input Report. The input report lists 59,401 AUM's for deer and the EIS list 41,353. We recommend that figures for deer, antelope, and elk be checked for accuracy.

33

If forage demand exceeds forage production on all but 284,000 acres, then the assumption that only 1,713 wildlife AUM's are unmet is not a valid or reasonable assumption. We conclude that unmet demand in Zone 1 alone far exceeds that figure.

Appendix 3, Allotment Categorization

The maps do not allow one to determine location of each allotment.

120

We question the categorization of the following allotments:

ALLOTMENT	NDOW RECOMMENDED		COMMENTS
	BLM CATEGORY	CATEGORY	
0402 Goshute Basin	M	I	
0407 Schellbourne	M	I	Season of use 05/01-03/31 does not assure that the resource can be maintained which precludes a categorization of M.
0415 Steptoe	M	I	Season of use 11/21-09/30 does not assure proper rest to maintain the vegetative resource which precludes a categorization of M.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 12

ALLOTMENT	BLM CATEGORY	NDOW RECOMMENDED CATEGORY	COMMENTS
0416 Heusser Mountain	M	I	Season of use 01/01-05/31 poses potential conflicts with sage grouse strutting activities. Revision of AMP is advised.
0419 Duck Creek Basin	M	I	Season of use 04/16-08/31 potential conflict with the only active sage grouse strutting ground in Duck Creek Basin, as well as key deer winter/spring range.
0423 Duck Creek	M	I	Potential conflict with domestic sheep and deer on important deer summer and winter/spring range in Duck Creek Basin. Late summer/early fall use by domestic sheep increases of key deer forage species.
0424 Gilford Meadows	M	I	Season of use 05/01-09/30 poses potential conflicts with deer in key fawning areas and spring/summer range.
0426 Cherry Creek ADP	M	I	Season of use 04/15-12/31 does not assure proper rest for the maintenance of the vegetative resource which preclude the categorization C.
0505 McDermitt	M	I	Potential conflicts with livestock and deer in fawning areas and summer range. Season of use could be adjusted.
0605 Ft. Ruby	M	I	Season of use 03/01-10/31 poses potential conflicts with sage grouse during the breeding/nesting period and does not appear to provide any rest during the grazing seasons.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 13

ALLOTMENT	BLM CATEGORY	NDOW RECOMMENDED CATEGORY	COMMENTS
0607 Strawberry	M	I	Yearlong grazing would not appear to provide sufficient rest to maintain the vegetative resource which is a condition of M categorization. Potential conflicts with sage grouse during the breeding/nesting period.
0609 Dry Mountain	M	I	Season of use (winter/spring) is not consistent with the maintenance of the vegetative resource without some sort of rest from livestock grazing.
0610 Sabala Springs	M	I	Season of use (winter/spring) is not consistent with the maintenance of the vegetative resource without some sort of rest from livestock grazing.
0803 Tom Pluin	C	I	Yearlong grazing would not appear to provide sufficient rest to maintain the vegetative resource required under C categorization. Potential conflicts with sage grouse in breeding/nesting areas and winter areas.
0805 McQueen	M	I	Potential conflict - deer spring range with season of use 04/15-10/31.
0806 McQueen	C	I	Potential conflict - deer spring range with season of use 04/01-10/30.
0129 Willow Springs	M	I	Contains crucial summer and/or winter deer habitat.
0913 Little White Rock	M	I	Contains crucial summer and/or winter deer habitat.

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 14

ALLOTMENT	BLM CATEGORY	NDOW RECOMMENDED CATEGORY	COMMENTS
0914 Chimney Rock	M	I	Contains crucial summer and/or winter deer habitat.
0808 Rock Canyon	C	I	Contains crucial summer and/or winter deer habitat.

Appendix 9

We question the fair designation given to Deadman, Old Deadman, and Huntington Creeks. We would not rate any of the riparian zones in the Buck/Bald area to be in fair condition. All are in poor condition. What criteria was used to evaluate? The following indicates other stream riparian conditions in Zone 2 and Zone 3

STREAM	ALLOTMENT	BLM RATING	NDOW RATING
Gleason	Thirty-Mile Spring	Good	Poor - Fair
Illipah	Moorman Ranch	Good	Poor
Boneyard	Gilford Meadows	Good	Poor - Fair
Gilford	Gilford Meadows	Excellent	Fair - Good
Goshute	Cherry Creek	Good	Fair
North	Duck Creek Basin	Good	Fair
Worthington	Duck Creek	Excellent	Fair

80

160

Comment Letter 74

Ms. Linda Ryan
December 21, 1983
Page 15

Again, thank you for the opportunity to review the draft and we hope our comments will be considered in the preparation of the final document.

Sincerely,

Willie
William A. Molini
Director

RPM:pw

cc: Wildlife Commissioners
Daniel A. Poole, Wildlife Management Institute
Paul Bottari, Nevada Cattlemen's Association
Rose Strickland, Sierra Club
Region I, II, III

ELY HEARING

Testimony 1

MR. IVERSON: My name is Paul Iverson, Carson City, Nevada. I represent the newly created Nevada Department of Minerals.

The Nevada Department of Minerals has several concerns relating to the Egan Resource Management Plan and Environmental Impact Statement.

A primary concern is a proposal to close several sections of land in which there are currently or have in the past been exploration activities; also areas having potential for geothermal development and sections of land under oil and gas leases.

129 | The department is also concerned about the designated mineral potential as stated

in the draft documentation. We believe that an area's true mineral potential can never be fully known until actual mining and exploration occurs. In many cases the major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seemed to have little or no mineral potential into a prime exploration target.

117 |

From our viewpoint, wilderness study areas should only be considered if an area has no mineral resource potential and that that is, areas with significant geological data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

Testimony 1

Furthermore, the department feels that if any area has favorable mineral potential that is to be recommended as wilderness, it should only be because, one, there are no alternate sites, with no mineral potential or two, if intense U.S. Geological Survey or U.S. Bureau of Mines study has been conducted at a sufficient level of detail to reclassify the area as having no resource potential.

The Nevada Department of Minerals would like to emphasize the fact that preserving and expanding the mining industry in the State of Nevada is considered a major element in the Governor's economic development program.

4 | The department feels that wilderness designation of such areas as those in the Egan Resource Area would be in direct conflict with the State's economic development plan. The Department of Minerals remains an active participant in the clearinghouse process by reviewing and analyzing proposed wilderness study areas with other State agencies and negotiate with them on important issues such as mineral potential. Since different agencies are concerned with various issues the negotiation process provides for State consensus resulting in the drafting of a recommended State policy which is submitted to the Governor for his review and final approval.

As a closing statement, the department does value preserving some public lands for

Testimony 1

future generations and scientific study as long as the mining industry which is so essential to our national defense and this State's progressive economy can remain healthy and be provided the opportunity to pursue new mineral resources.

Thank you.

Testimony 2

MR. HENDRIX: My name is Bud Hendrix. I live at 321 Fay Avenue in Ely. I am representing the Hendrix families that own about fifty-eight unpatented claims and seven patented claims in the Egan Area.

I'm a little appalled at the lack of interest in this meeting this evening. I thought that there would be more people here to listen and make comments.

I have gone through this wilderness technical report and am fairly well pleased with it. A lot of work has gone into it.

In some areas I was a little disappointed in the lack of information and it seemed to me that the minerals part of it was kind of downgraded or maybe they didn't mean to downgrade it, but that's the way it seemed to me. They didn't put enough emphasis on the importance of minerals.

In another part of the book they went into the fact that the government isn't going to stockpile no more of this mineral or that mineral because they had plenty of it. And, then they stated that a certain percent, certain type of mineral was imported from foreign countries, just like that pipeline would always be open. And, we know this isn't right. You can have a source of foreign material today and tomorrow that material can be cut off.

All we got to do is look back at the gasoline shortage, or supposed to have been a shortage, which was no shortage at all. But the only shortage was between our two ears.

Testimony 2

130

Something else that bothered me a little bit is the northern boundry of this South Egan District. There's still a patented mining claim in the area that's included in the study area. And, I can't understand why that was left in there.

Furthermore, they didn't -- they deleted some of the mining property, but didn't go near far enough. Also, they don't seem to have too much information on the metals and minerals that are in that area.

I have probably spent more time in that area in the northern part of the South Egan Range than any individual in White Pine County. My father use to run sheep there. I have walked over it, I've rode on it on a horse many times. This fall since the 28th of July I have spent twenty-nine days there. Four of those days we stayed right there night and day.

There is available information on several drill holes, some of them to the depth of twenty-eight hundred feet. And the assays of those drill holes indicate a metal about the same amount all the way down twenty-eight hundred feet. And, then there's some not quite so deep that indicate the same thing. The surface of this mining area hasn't even been scratched. The only work that's been done of any significance is down in the bottom of the canyon. This patented claim up on top a little ore was shipped from there and we shipped a little ore a little ways south of there. This patented up on top has been tied up for years in an estate and no one could do anything about it. But a private party has that now and so we may see some action in that area.

Testimony 2

I go along with the department. I'm totally agin tying that area up in wilderness. That area is my main interest. But, I'm agin tying any area up where there's a potential for mineral or gas or oil. This nation should be self sufficient and I'm sure we have the material if we just get busy and develop it. We shouldn't be dependent on any other nation for the material that we need.

I appreciate this opportunity to say a few words and I am preparing a written document to the Bureau and I'll give them in this document a log of two or three of those holes that was drilled with the assays and all, so it will give them a better idea of mineral in that area. Okay. Thank you.

I'd like to make one more statement. It would be a crime to the people of Lund to tie that area up. They have used it since 1900 for wood and rocks or whatever they might want. And, to tie that up in a wilderness area would be a crime against that group of people. So, I hope we don't get foolish enough to do it. Thank you.

Testimony 3

MR. CARPENTER: I'm Robert Carpenter, Chief of Surveys for the City of Los Angeles Department of Water and Power, the Development Manager for the White Pine Power Project.

I'm here tonight to provide some preliminary comments on the Draft Egan Resource Management Plan and Environmental Impact Statement. We have reviewed the Egan EIS and offer the following comments with regard to the White Pine County Power Project. We concur with the Bureau of Land Management evaluation that a case by case processing of utility rights-of-way will lead to disorderly, and unplanned pattern of right-of-way through the county and that the lengthy application process and uncertainty as to whether the rights-of-way will be granted benefits neither the developers nor the public and hinders long-range planning.

Secondly, the White Pine Power Project transmission corridors from the North Steptoe Valley and the Butte Valley alternative sites to the Machacek Substation are not included on the Egan EIS. These corridors should be shown on the EIS maps for the preferred alternative, the goods and services emphasis Alternate C and commercial emphasis, Alternative D. And should be discussed in the text for each of the alternatives. The Machacek corridors should be included in the Egan Resource Plan and Environmental Impact Statement. These corridors are evaluated in the Draft Environmental Impact

8
9

164

Testimony 3

Statement for White Pine Power Project, which was released last Thursday on October 20th.

Our preferred railroad corridor for the Butte Valley Site through Egan Pass is not shown in the Egan Preferred Alternative. This railroad corridor would be the most desirable route should the Butte Valley Site be selected instead of the North Steptoe Valley Site which is our preferred site.

On Page 93, Item 17, BLM has estimated that fourteen acres per mile of transmission line corridor would be affected by construction. For the two, five hundred thousand volt lines that are in the southern transmission system of the project the amount of land affected by construction would be approximately seven acres per mile, primarily due to construction of new access roads. If existing roads are used, which we attempted to do, most of the way, land disturbance would be limited to area around the transmission tower footings.

We will supply additional written comments on the EIS by November 24th, 1983. Thank you for your consideration.

8

131

RENO HEARING

Testimony 4

MR. DELGROSSO: It's only going to take
a second.

As Paul Iverson mentioned
the State is getting together the various departments and
divisions to consider wilderness proposals and one of the
reasons we are here tonight is to get input from the local
people, get their feelings. And we're a little bit
disappointed there weren't more comments made. But what
we have heard has been helpful. Thank you.

Testimony 5

SAME AS TESTIMONY GIVEN IN ELY

SEE TESTIMONY 1

Testimony 6

MR. WATSON: My name is Charlès S. Watson, Jr., Director of the Nevada Outdoor Recreation Association. The headquarters are in Carson City, Nevada. We are an organization of approximately 400 members, not only in Nevada, but in 17 other states.

The main thrust of our organization is in support of the continued existence of the public lands and public ownership. We also exist for the support of the Federal Lands Policy Management Act.

My statement is this: To begin with, concerning the RMP, this organization has serious objections to raise concerning the proposed land sales within the district. In the Egan proceeding, the BLM proposes to offer for sale nearly 80,000 acres within the scope of just a single BLM resource area. We find this truly astonishing in light of both of the Secretary of Interior's and the Property Review Board's clear pronouncements: That large scale land sales would cease on the federal lands. But there is someone who doesn't get the word.

I recently visited Boston, Massachusetts, where I was briefed by our attorneys at the Conservation Law Foundation. As you are no doubt aware, the Nevada Outdoor Recreation Association is a co-plaintiff in a lawsuit challenging the legality of the "asset management" land sales of what has been called privatization.

We consider this whole program as nothing less than a "great terrain robbery" that would deny Americans and future generations their land inheritance.

Incidentally, while in Boston I learned that at the last Court hearing before Federal Judge Andrew A. Caffrey,

11

166

Testimony 6

the Justice Department attorneys has assured the Court that, all substantial sale programs, as charged by the plaintiffs, are no longer being considered by the US Department of Interior. Gentlemen, in light of this, these sales violate not only FLPMA law, but now extant government policy. They should be removed from the RMP.

Those are now our wilderness recommendations:

1

Number one, Goshute Canyon. We endorse a combination of the preferred alternative and the wilderness emphasis alternative. We have visited this exceptional and unique wild land. The existence of the native trout streams and such wonders as the Goshute Cave were first inventoried by NORA in our NORA Index and Survey nearly 20 years ago.

In the mid-1970s, we again visited the canyon with BLM personnel and actually observed the native fish in the Goshute Creek area. We came away truly astonished and impressed with its geological, botanical, archeological and wildlife attributes.

The area has rare spotted bats, Utah cutthroat trout, ancient Bristlecone pine forests and truly spectacular cliffs and canyons. We urge preservation of 28,600 acres.

2

The South Egan Range: We are very concerned and perplexed over the failure of the BLM to include this area in its preferred alternative. We know of stunning sets of towering bluffs, hidden gorges, white fir forests from Brown Knoll to Sheep Pass Canyon. Again, this area contains ancient Bristlecone pines and an unusual pit cave -- angel cave -- near the top of the range.

132

The Egan Range is known to us as an important habitat for predatory birds. All too often, we have seen the BLM indicate that "ways" both in and outside of the WSA

Testimony 6

constitute "substantial" intrusions and thereafter effects solitude.

132

We challenge such statements in the light of our investigations of district and state office records and photographs of these roads we have seen. They are clearly trails and ways. These are for the most part paths that actually help the casual hiker enjoy the wilderness threshold. This is truly one of the most rugged areas of wild lands in the State. It is an exceptional area; and we recommend protection of 57,660 acres.

The Park Range: We have known this area from explorations dating back to 1960. This range was one of the first de facto roadless wilderness areas to be noted in our Nevada Outdoor Recreation Resources Index and Survey.

While there are no towering peaks, it is one of the most pristine massif-type mountain areas -- massif, m-a-s-s-i-f -- in the state. It has a great resemblance to the Black Hills of South Dakota. It is known to us for its pristine hidden glens, beautiful sedimentary rock formations, untouched meadows, and colorful bluffs and cliffs. It has high value for wilderness screening, because it is well forested. Therefore, we urge 46,831 acres for wilderness protection.

3

Riordan's Well: This organization urges 45,791 acres as suitable for protection as wilderness. These mountainous ridges, which extend up to 9,352 feet, is in an area rich in geological displays; faulting, complex thrusts, and vulcanism.

Its higher slopes are covered with virgin ponderosa and there are cliffs, bluffs and ridges known to contain important predatory bird raptors. It is an important

Testimony 6

winter deer habitat, and we have received reports of elk in the WSA.

There is a cave system in the area, which has yet to be explored and mapped by professional spelunkers. Too many of these virgin caves are being lost, even before the most rudimentary examinations can be made of them.

We simply are not convinced by reading the BLM's technical report, that they truly understand what a treasure-trove this series of connected Grant Range ridges is. Surely, enough is known concerning its wilderness character to upgrade the BLM's preferred alternative.

I have some closing remarks. The bibliography of the reports that have been issued by the BLM, not the Ely District but others. In closing we must point out a glaring omission in all the BLM reports we have seen, including Egan, that have come out in Las Vegas and other areas as well.

133

Since 1959, we have repeatedly brought the NORA Index and Survey -- this is a giant book, 25 pounds, that contains photographs, maps, and narratives -- and periodically we visit every district in the State of Nevada, including resource area offices. Much information that was in BLM files that was used to consider these WSA's came as a result of the NORA Index and Survey being fed into the BLM planning system as early as 1966.

The NORA Index and Survey is a large inventory, consisting of mainly maps, short narratives, and extensive color photographs of BLM wild lands which dates back to 1958. It is extremely comprehensive. Even the Public Land Law Review Commission and the National Park Service in 1966 and 1969 have

Testimony 6

133

noted in their reports to Congress that this inventory was the first and original BLM public lands environmental project in the nation.

We trust, therefore, that the record will be corrected in regard to putting the references of the NORA Index and Survey into them. Thank you very much.

The following letters under Testimony 6 were submitted by Charles Watson during his oral testimony.

Testimony 6



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

IN REPLY REFER TO
6101.7 (712e)

May 17, 1967

Mr. Charles S. Watson, Jr.
P. O. Box 6601, Lemay Branch
6197a Lemay Ferry Road
St. Louis, Missouri 63125

Dear Mr. Watson:

Thank you for your letter of May 10, 1967 and the attached correspondence from Mr. Baker to Dr. Lyon, dated April 27, and Mr. Baker's letter to you on the same date.

You have raised several questions in your letter that I will try to answer as best I know how:

- 1. "It would appear that his letter to Dr. Lyon indicates Mr. Baker knows nothing at all about the 'task force' on recreation you discussed with George Kell and I early last year. I had understood that during your trip to Nevada, at that time, you discussed this with Mr. Baker and Mr. Keil. As I recall it was agreed 'NORA' Inc. would be made a part of this 'task force on recreation'."

Answer:

My one and only trip to Reno, Nevada in connection with the N.O.R.A. program was when Mr. Penny was State Director. Mr. Keil was at that time Assistant State Director of California. A meeting was held by me with Mr. Kell of N.O.R.A., Mr. Penny and Mr. Baker at that time. As I recall, our general discussion with Mr. Kell centered around a "joint effort" on the part of N.O.R.A., BLM and other agencies, to identify, study, exchange information, and assess outstanding scenic, natural, historic and outdoor recreation opportunities on BLM lands in Nevada. In my phone conversation yesterday with Mr. Baker, he stated that he recalled no specific reference to the establishment of a task force during this meeting. I believe this to be understandable in that our discussion was general and was mostly focused on joint efforts in the exchange of information and how N.O.R.A. and BLM could best accomplish this. As I recall, no reference was made toward establishment of a working group, membership of group or assigned responsibilities normally considered the formation of a task force. I am assuming that you have somewhat the same viewpoint of what constitutes a task force.

It was my view during that meeting and subsequent meetings with you, that joint efforts are necessary between your organization and ours (and other agencies) to be sure that all the outdoor recreation opportunities on BLM lands in Nevada are identified and that we move as rapidly as we can to preserve and protect them within the limitation of funds and manpower.

Testimony 6

It was not my intention to establish a task force on recreation for Nevada with specific membership, specific duties and specific responsibilities, but rather your group and ours work together jointly to freely exchange information and receive the benefit of individual knowledge, expertise and experience. I recall stating to you that joint effort could best be accomplished by identified individuals of your organization and ours studying together the opportunities in Nevada. This is what I envisioned we would do, both here and at the field level. Whether I called it "task force" or "joint effort" I truthfully don't recall. Nevertheless, it still is my view that we should continue to objectively analyze together, cooperatively, the Nevada recreation resources - endeavoring to find ways to preserve and protect them. You are, and have been the spokesman for N.O.R.A., and I have sought to the best of my ability to discuss with you the various problems in order that you can participate jointly in our effort; I will continue to do this. I do not, however, feel that this effort requires a formal working group with an established membership and responsibilities.

2. "I would also appreciate an explanation of what Mr. Baker means by his claim that N.O.R.A.'s survey had been considered. . . ."

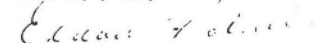
Answer:

It would be my thinking that Mr. Baker is referring to actions taken both at the Washington level and Nevada level in connection with the N.O.R.A. survey.

A good deal of time has been spent at both levels in comparisons of inventory information, analysis of significant areas, and, being sure that all possible opportunities are identified. This includes microfilming the N.O.R.A. survey at the State Office, and providing the respective District offices with all this information. Each District office in its development of plans for protection, preservation and development is giving and will give full consideration to N.O.R.A.'s inventory along with BLM's to be sure that no opportunities are missed. To my knowledge your inventory and assessment of significant areas is a very basic part of our inventory, and that through the exchange of information between N.O.R.A. and BLM, both of us have a pretty good picture.

I have always enjoyed our discussions over the many hours we have spent analyzing inventories and problems of protection of the Nevada recreation resources. I hope you will continue to give me your viewpoints and comments as they occur to you.

Sincerely yours,



Eldon F. Holmes
Chief, Recreation Staff

Testimony 6

THE WHITE HOUSE
WASHINGTON

July 7, 1983

Honorable James Watt
Secretary of the Interior
Washington, D.C. 20240

Dear Secretary Watt:

I am writing to clarify the role of the Property Review Board as it relates to the disposal of public lands by the Department of the Interior. In Executive Order 12348 the President directed the Board to develop and review policies of federal agencies as they relate to the management of real property. In this regard, the Board has consulted with the Department of the Interior to determine the Department's current land management policies and to give the Department guidance as to where those policies could be adjusted to make them consistent with the provisions and the philosophy of the Executive Order. The Executive Order did not intend nor has the Board presumed for the Board to become involved in the operational functioning of the agency in regard to the management of the public lands.

The Board has not requested that you consult with it in regard to transactions where land is sold for fair market value. We are interested in the Department's sales program in order to monitor the progress being made in the disposal process, but it is not our intent to in any way inhibit the statutory authority granted you to sell BLM lands. It would be helpful if the Department of the Interior provided the Board monthly with a summary of the previous month's sales activity.

I trust that this letter will clarify any confusion that may have existed concerning the Board's role in the Department of the Interior's disposal process.

Sincerely,



Edwin L. Harper
Chairman, Property Review Board

Testimony 6



THE SECRETARY OF THE INTERIOR
WASHINGTON

July 18, 1983

MEMORANDUM TO WESTERN GOVERNORS

From: Secretary of the Interior

Subject: Good Neighbor Policy

I was particularly pleased with the opportunity to share with you the tremendous successes we have had in the last two and a half years. I felt your questions, both in private and public, dramatized the real progress that has been made. The questions that were not asked were more revealing than the questions that were. As I reflect back over the several meetings we have had in the past and compare them to the Montana meeting, I am delighted with the progress that has been made. That is not to suggest, however, that more progress does not yet remain to be realized.

One of the areas that continues to draw criticism deals with the disposal of lands no longer needed by the Federal Government. I am satisfied that the mistakes of 1982 are not being, and will not be, repeated. Each Governor has been briefed, or his staff has been briefed, on our plans for disposing of the few isolated tracts in the respective states. Several of you did suggest that we needed to reduce the involvement of the Property Review Board of the White House in the Department of the Interior activities. I assured you that as a practical matter they were not involved, but I would seek to formalize that relationship.

Upon returning to Washington, I have secured from the Chairman of the Property Review Board a letter that clearly states that the Board was not to "become involved in the operational functioning of the agency (Interior) in regard to the management of the public lands." I am attaching a copy of that letter just so that there can be no doubt. I am satisfied, based on the private conversations and the public dialogue, that there is no room for criticism of this program as it relates to future activities. Criticism of the past is for the most part justified.

I look forward to improving relationships and thank you for helping us to be as successful as we have been.

If you have any concerns or questions, please call. The rule continues to be that if I don't hear from you, things are going well.

Testimony 7

MS. WOODIN: I'm Terry Woodin. My address is Reno, Nevada. I represent myself and a large family.

My main remarks are directed to, one, thanking you for your courage in this political climate to be willing to set aside any lands for wilderness designation. A bit of chagrin to find my tax dollars are paying for statements that essentially say, "No land can be set aside," because in order to set it aside we first have to explore to see if there are mineral resources.

And the sort of exploration that was described would, in effect, destroy any wilderness designation that was there to begin with.

And to urge you to include in your wilderness areas not only those which you have already included, but those which are just recommended to you by the previous speaker, because as -- not only as a mother of a large family, as a scientist I realize the necessity for keeping some for future generations to explore areas which have not been touched or damaged, so that things that we now do not anticipate being valuable will be available to be utilized in the future.

Thank you.

Testimony 8

MR. CLARK: My name is Gary Clark. I live in Sparks, Nevada. I am with the GPAA, the Gold Prospectors Association of America.

4 | I support wholeheartedly the State's position on mineral identification and resource management of those minerals in this State. I have spent a great many summers in the Egan District. There are some very pristine areas; however, the amount of land required certainly is grossly overestimated. The entire state would be served by those areas being put into a State Park system. Thank you.

Testimony 9

MR. WARREN: My name is Bob Warren. I'm the Executive Secretary of the Nevada Mining Association. The Mining Association has some 730, I guess, up to this time, members. Sixty of them are the larger corporations; the Anacondas, Kennecotts, and Duvals.

The larger operating mining companies in Nevada upon which the rural communities depend for their economic sustenance--others are individuals who are interested in mining - hope to be someday prospectors, hope to be someday producers and suppliers of equipment and supplies, and mining law attorneys.

A large number of them are also small exploration firms; some of the largest exploration firms in the nation and some of the most sophisticated in the world.

We, also, I feel, represent directly the people who live in our rural areas in Nevada who must depend upon mining and ranching for a long-term economic liability; the families, their children, their cousins, and all of the people who depend upon a strong economic base for continued high quality of life, which they hope to preserve in Nevada.

My formal statement is not to be interpreted by the individual staffers of the BLM as critical of them as individuals. I respect your integrity and your professional competence, and you know that I do.

I think, however, that my remarks will demonstrate that you are victims of the system.

A careful reading of the Draft Resource Management Plan in the Environmental Impact Statement leaves the Nevada Mining Association to reluctantly conclude the judgmental elements of this report are heavily biased toward creation of wilderness at the expense of the development of the resource

Testimony 9

Testimony 9

potential of the proposed wilderness areas.

4

The judgments that flow from this systemic bias will irretrievably injure the economic viability of the communities near these sites. This built-in bias toward wilderness is probably not evident to the BLM professionals who prepared this document, because it flows logically from certain key assumptions in the planning process. The result, however, unfortunately, is an anti-mining document.

These two assumptions: Assumption one, the rating system to determine mineral potential is prejudicial and unprofessional according to top exploration geologists, many of whom are located in Reno, because Nevada is now considered one of the prime targets for mineral potential in the entire United States and, indeed, in the world, we have firms here from Belgium, South America, France, Germany, England. We have the top talent, the cream of the talent in the state.

116

A high rating for mineral potential is given only if the area shows favorable geological characteristics. Of course, that would be appropriate. And if the area is contained or are extinctions of active or inactive properties which show evidence of ore for mineralization. In other words, to rate high. And if you are not high you are not to be considered a candidate for wilderness. To rate high there must have been previous evidence of mining -- evidence of previous mining.

Based upon this flawed rating system, such major mineral areas such as Freeport's World-Class Gold Mine in Elko City and the U.S. Steel Corporation's discovery of nearly two billion tons of high-grade ore east of Yerington, do not qualify as areas of high mineral potential. Yet, these are

some of the most significant discoveries made in the last ten years in Nevada.

Face it, we wouldn't qualify under the definition of high mineral potential in the BLM's rating system. In similar "non-mining areas" today, other important discoveries of minerals and resources are being made. They are the results of today's sophisticated geologic models and geologic concepts; thus, the built-in bias number one:

129

The BLM staff cannot properly rate an area's mineral potential under the system. Areas with potential for production are thereby automatically underrated and become candidates for wilderness.

Assumption number two: There are only two of them that I am commenting on that have created this systemic bias. Quoting from the page 105 of the draft EIS, we find the following assumption: "There would be minimal overall impacts on the local non-ranching community," if we were not permitted to mine, in other words.

134

If the exploration for the production of mineral resources is forfeit, there would be forces - there will be minimal overall economic impacts on the local non-ranching community. I will offer evidence later to demonstrate the fallacy of this assumption.

134

But with such an assumption as planning guidelines, and it is one of the planning guidelines, BLM staff has found it much more comfortable to make the judgment that wilderness values outweigh the benefits that would flow from future mineral production.

Testimony 9

Speaking specifically to this Egan draft, may I point out the erroneous conclusions that have resulted from these two erroneous planning assumptions? For instance, in the analysis of the Park Range, the technical draft states, Page 11:

135 "Wilderness values are high and in nearly all cases take precedence over current or potential incompatible uses."

BLM can support such a conclusion when it is based upon an assumption of only minimal economic impact on the Nevada communities when the future of mineral production is forfeit.

The analysis of the Riordan's Well states also: "Wilderness values are limited" -- and they don't point out that they are limited -- "but appear to be the highest and best use for the core of this area."

This statement, despite the high mineral potential of this area, which I will document again in our program,

136 and I am quoting, again, "The wilderness values were of more importance than a moderate potential for minerals based on a geologic inference."

But the conclusion of "moderate potential" is based upon the faulty definition of what is high or moderate mineral potential. It flows, again, in part from built-in bias number one: That there must have been previous mining to rate as high potential.

116

And we all know that is no longer a proper geologic determination. The best discoveries in Nevada are being made in areas that had no exploration previous and no evidence of previous mining.

To comment on the Goshute Canyon, we find the same bias in the analysis of the Goshute Canyon. The analysis states: "It was decided that known high wilderness values in

137

Testimony 9

this situation outweighed an unknown potential for mineral resources."

Here again, the two key planning assumptions lead to inaccurate conclusions. The minerals rating system fails to recognize the mineral potential, and it was assumed that forfeited mineral production is of minimal concern to persons living within that county. Thus, BLM staff is able to conclude that wilderness is the highest use of the land.

Quoting from a report prepared at BLM's request by the Nevada Mining Association, BLM asked us to review the GEM report, which was contracted for by BLM, to review the areas. It was largely literature search and BLM recognized that. So they asked me to put together some of the top exploration jobs in the world and in Nevada. I did so. I did so, and about nine of them reviewed the report and found that because it was limited to a search of literature, primarily the officers didn't have a chance to get out in the field, but they had terribly understated some of the potential.

For instance, in the Goshute Canyon area the nine geologists concluded this, and I am quoting from the report: "High exploration potential for precious and base metals."

Listen to this: "The formation names of units in the Cherry Creek Range sounds like a "Who's Who" of host rocks for major ore bodies."

Yet, the conclusions of the BLM, EIS and the U.S. management report says this is an unknown potential and,

138 therefore, it cannot be considered as a component weight against the wilderness values.

Testimony 9

Let me move now to more specific comments which will be backed again by documentation entered into your record.

116

Back again to assumption number one, a high mineral potential rating is limited only to areas of previous mining or evidence of mineralization. BLM's own geologists know that this is untrue. I had talked to some of them about this. They are disturbed about the trap that has been laid for them, because all of these guidelines were laid down by a previous administration at a time when there was not only a systemic bias towards the creation of wilderness, but there was a political bias at that time.

I suggest that BLM's management -- because the geologists don't need to do that -- confer with the Nevada Bureau of Mines and Geology and other geologists identified in my exhibits, and those geologists that put this report together are some of the people from Noranda Exploration, the eighth largest mining company from the United States; from the Anaconda, from the Freeport Exploration, from Asarco, and several of the independent jobs including the former professor of the Mackay School of Mines.

I would suggest that the management confer and find out the true feeling about what is and what is not a proper tool to identify mineral potential in an area. I will also place some testimony in the report requested by BLM from the Nevada Mining Association. This is the report I just told you about.

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We did this, and we find that the limited report of the dealing contract based upon the dollars available, simply wasn't able to identify mineral potential. We urge,

Testimony 9

therefore, that BLM adopt a more professionally recognized rating system for mineral potential.

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And we likewise urge BLM to make use of the information compiled by NMA's team of nine skilled geologists, and I will submit that into the record.

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Finally, we urge BLM also to re-think assumption number two; that the loss of future mineral production will have only "a minimal overall impact on the local non-ranching mining community." I can put it in parenthesis that if you are talking about ranching community, it is also going to have an impact on the ranching community. Because Nevada ranchers know. They do not believe the statement by the Federal Government that if you create a wilderness you will be able to continue to raise your cows, continue to have access to your water wells and to your tanks. They know better.

139

And the Cattlemen's Association of Nevada and National Cattlemen have resolved repeatedly that they are terribly concerned about setting these areas aside for wilderness, because they know eventually it will severely cripple the cattle industry.

These assumptions have robbed BLM of the objectivity it needs to evaluate which public lands should be closed to mineral production if continued -- And it has gone on with the previous reports; that was, the same systemic bias has continued - this statewide bias will severely injure the economic viability of Nevada's rural communities which must depend upon ranching and mining for the next 100 years or more as a source of employment, income, tax revenues, and the economic vitality that can contribute to the high quality of life for Nevada's rural citizens.

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We are talking about wilderness to contribute to

Testimony 9

140 | the high quality of life for the hikers. We ought to consider high quality of the life to the rural citizens who live in the .

The necessity of continued mining and, therefore, access to future mineral deposits, is documented by a recent study by three University of Nevada economists, published by the Bureau of Business and Economic Research -- and I will submit this into the record tonight -- the report is entitled "An Analysis of the Economic Impact of the Mining Industry on Nevada's Economy "

If someone would like to know about the importance of the mining industry to the rural community, you need to review this highly professional report.

If BLM fails to correct this bias toward wilderness built into the statewide wilderness evaluations system, the agency will severely injure the long-term interests of the ranching industry, as I had pointed out, the interest of vehicle orientated recreationists who need more, not less, access to Nevada's mountain playgrounds; the interest of hunters who can no longer drive into some of the best hunting areas in the State; and, of course, the mining industry which must mine where nature created and exposed ore deposits, not deep beneath Nevada's valleys and dry lake beds.

141 | THE HEARING OFFICER: Would you conclude --
MR. WARREN: Yes. I have one paragraph left.

140 | Nevada's preservationists are asking for exclusionary use of up to five percent of the public lands. Mining would be happy with one-tenth of this to mine. Our activities disturb about a scratch of a, chicken in a large football field.

7 | Nevada's ranking geologists recognize that some 70 percent of this land being proposed for wilderness has

Testimony 9

high potential for mineral production. And, in fact, some of it is probably the most favorable area in the State. Inasmuch as there are 70 percent, there still are 30 percent probably that would not have high potential; that would be an ample area, considering all of the wilderness areas, some hundred areas of Nevada in consideration for wilderness.

If 30 percent belonged to the Forest Service and the Department of Fish and Game, Wildlife, and the Federal Department were put together, there would be a vast wilderness area in the State without injuring the mining and ranching industries.

141 | My final comment, please don't forfeit the long-term interests of Nevada's rural mining communities for a trickle of Nevada and out-of-state hikers who seek a "wilderness experience" without concern for the obvious injury to the economy and quality of life of rural Nevadans.

I will submit these documents for the record.
Thank you.

Testimony 10

MR. ADAMS: My name is Rudy Adams. I am from Reno, Nevada. I am a member of the Gold Prospectors Association, which has approximately 100,000 members in the nation and about 3,000 of those in Nevada, and the local Comstock Chapter has approximately 300 members.

I would like to address the issue of the wilderness areas. I think they are a little bit ill conceived, as the previous speaker implied better than I could possibly say it, but the bottom line comes down to stop picking on Nevada. There is nothing wrong with having wilderness areas in some part of the country, but it seems like we are getting too much of our share being proposed here.

We presently have access to this land for not only recreational, prospecting, but for the more serious mining interest. But with the wilderness concepts slowly creeping along, we are slowly being denied access to this land or would be denied access to this land.

So therefore, I am not in favor of that in any way. So we should maybe consider some more of the eastern states that have some areas and, of course, the gross discrimination against the handicapped and the senior citizens, of course, is a very serious issue to address, because as the wilderness concept simply means unless you are very hale or a very strong-type person or hiker and that sort of thing, you are not going to be able to enjoy it.

Then, of course, I would also like to comment on the fact, knowing the nature of the government, that we really have no guarantees that in the future even the wilderness areas would be protected. So, therefore, I am not in favor of wilderness areas in this area in the State of Nevada in the

Testimony 10

concept that is presently being considered, of which is too much land, as the previous speaker spoke of, and as Mr. Clark addressed earlier in the evening, that some of these areas that are -- could be put aside as possibly state parks that do not have any mineral potential, are not readily available or the type of property that would be available to the handicapped and the senior citizens.

In fact, if we use the criteria of the present wilderness system, Yosemite National Park would be a wilderness area. And, of course, we would all be missing a very valuable treasure there if we would not be able to see it. That is the whole concept, the American people of our land should have access to it and be able to see it and not limit it just only to the hale and the hearty.

So with our small Nevada population and, of course, the few visitors that we have, I do not think it would be used very much anyway, and I think that there is a possibility that they could be more useful, as our Director of Minerals pointed out earlier, that this is a mining state and it is moving along, and we in the prospecting organization are out there looking for things that we hope someday will benefit our State from an economical standpoint and, of course, improve our quality of life. Thank you.

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93

142

143

Testimony 11

MR. DWYER: My name is Larry Dwyer. I live in Reno, Nevada. I am here representing myself as well as many friends of mine who enjoy hiking, backpacking, fishing and hunting in Nevada's many de facto wilderness areas, as well as the few designated wilderness areas.

I commend the BLM for their proposal which includes the three wilderness recommendations on the map and their preferred alternative. I would also urge the BLM to extend their proposal to all four of the study areas. In particular, I would recommend adding the Goshute Canyon area, as well as including the South Egan area in the wilderness proposal. Thank you.

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Testimony 12

MS. KEENEY: My name is Nina Keeney. I am Treasurer of the Great Basin Group of the Sierra Club. I don't like -- I don't hunt, I don't fish or prospect or mine or ranch, but my concern is mainly that with the -- all of the raping that has been done to the environment and the land and on the east where you have so few areas left that are populated, I think we should reserve as much land as we can now for the future generations to come. Thank you.

Testimony 13

Testimony 13

MR. ARNOLD: I am Ray Arnold and my address is in Reno. I have lived here some 13 years, but I have been an inhabitant of Nevada for some 30 years.

144

I know it well and I have explored the Black Rock Desert. I have explored in the Ely area. And I was free to go anywhere anytime that I wanted to. I could walk with a stick in my hand and I could knock off a rock and look at it, inspect it, and proceed.

There are thousands of people in this small State, a small populated State, that are prospectors. They are interested in more in the welfare of the State than they are of themselves.

Let me tell you, not all of us have the luxury of time and of the money to put on a backpack and walk out into the area. There is nobody preventing them from doing that, regardless of what happens at the final decision of this great Congress who will have the final approval.

93

May I say that there are thousands of prospectors that ride out into the hills with a pick in their hands. They are hardly able to move around, hardly able to get up in the morning, but the pleasure they get of going out there and seeing the beauty of this country, irregardless of the two or three or four, half a dozen mining ventures that have been created in this State; such as in Ely, such as in Yerington -- is that where the big copper mine is? All right. Those have not deteriorated the area or the areas for the hikers. They still hike. They go anywhere they want to, and I have yet to see a mining venture destroy a view or destroy very many plants except where they are actually operating and putting in roads.

But let me say, I heartily favor our speakers, the statements made by Paul Iverson and Bob Williams (sic). And I hope a lot of other people here can support this.

Testimony 14

MS. BROWNSON: My name is Elizabeth Brownson. I am a resident here in Reno, Nevada. I also want to commend the BLM for their report and their study, but I hope that they will also extend their recommendations to include the conservationists areas in the decision, all four of the lands.

I really think it is important that we don't look at just today and now, but consider the whole history to come still, that these lands are valuable to maintain.

As Mr. Warren states, we are not creating the wilderness. It is there and we need to save it, I think.

I am not against progress. I have lived a good part of my life in major cities and enjoyed it, but I think the most valuable experiences you have is when you go in the wilderness areas and experience that. I mean, it just -- I can't believe you are talking about this map. It is just a little area of the whole State, a small percent, and you are talking even about a smaller fraction of the percent in these areas that are colored in.

There might be some mining there, although in the Park Range there is really not any.

I think the value that you are going to gain by saving and preserving those areas is going to be far outweighed. And I don't -- there is still a great deal of land in the State still to mine, and I think it is important that we save it, and that the areas we do want to preserve are rich with wildlife and all sorts of resources that we want to preserve.

Testimony 15

MR. SMITH: My name is Ross Smith. I live in Reno and at the present time I represent myself, only.

My acquaintance with the Egan Resource Area dates from quite a while ago. During my college days at UNR in the late 40's, I worked for several summers over in the Liberty Pit at Ruth for Kennecott Copper Corporation.

After graduation, in 1950 I worked for a year as a mining engineer for a Consolidated Copper Mines Corporation, Kimberly Nevada, a company which later sold out to Kennecott and no longer exists.

At that time I did visit at least one of the areas. I visited the Goshute Canyon area, and I may have visited the South Egan area, although I am a little bit uncertain now about exactly where I did go. It may have been a little north of there.

At the present time I am a professor of minerals processing in the Mackay School of Mines, University of Nevada, Reno. Now, at the same time I am an environmentalist and a member of a number of environmental organizations. And since 1940, I have been a backpacker and have backpacked over most of the western United States and have seen all types and manners of wilderness areas, de facto areas, and so on.

As I stated before, I represent myself, only. When I think about this, of course, I do experience some conflicts when I think of my mining position and background and of my love and respect for the wild places of the United States.

Of course, when I take a stand on something like this, I must decide on how I will act as a true professional, based on the greatest good for the most people over the longest

Testimony 15

period of time, as I see it.

Actually, however, in the case of the Egan area, the choice is easy, as it is in many other areas, considering the amount of designated wilderness that does exist in the U.S. at the present time. I think that at least the wilderness emphasis and preferably the All Wilderness Alternative should be recommended. I will attempt to explain why.

There are, according to the BLM, approximately 3.8 million acres of public land on the resource area. The four areas being looked at are already, you know, a compromise of a compromise. And if we reduce the area of any of them further, we have another compromise. We are being compromised to death here. And every compromise really is a loss. Even the All Wilderness Alternative would involve only about 6.2 percent of the public lands in the Egan Resource Area; really a rather trivial amount. The wilderness emphasis is only about four and a half percent.

Now, I ask you, is that all that is left of our Nevada wild heritage? I mean, is that all we can come up with out there?

Further, you know, we have had people talk about, oh, the people who live out in White Pine County. I know some of those people. I also know many who have left the area. I mean, I still know a few, but most of them have left by now or have died, or various things have happened to them.

I cannot believe that all the people in White Pine County want every last square mile, every last square inch, I should say, of the Egan area roaded.

You know, many of the people out there really like the land, the land out in White Pine County. They are, of

Testimony 15

course, suspicious of the government and so maybe we all are in our own way. But I seem -- it seems to me that someday they will all recognize and realize that the only way to really protect their wild Nevada heritage is through a certain quantity of formally designated wilderness areas.

Concerning mining and geothermal development, again we are only talking about four and a half to six percent of the Egan area. And, again, I would claim that this is insignificant.

Consider, for example, Nevada has been opened to mining, prospecting and the like for a long time, for well over a century. Furthermore, among western states, the lower 48 and more of it has been available for prospecting.

Furthermore, as was noted in McPhee's recent book on the Great Basin, Nevada is aware, in his words, everything hangs out unencumbered by thick vegetation and soil. In spite of this and in spite of the fact that any number of prospectors have gone over the State time and time again. And, furthermore, yes, a few more things can be found through modern methods, but maybe not all that many.

In spite of this intensive look that has been given to Nevada by prospectors for well over a hundred years, there really is surprisingly little mining in Nevada. In 1981, according to the U.S. Bureau of Mines Mineral Yearbook, Nevada was only sixteenth in the nation in production for value of non-fuel mineral resources; thirty-third based on a square mile basis, per square mile basis.

Also, let us consider -- I mean, that is just -- there are lots more important mining states than Nevada, obviously, and this is in spite of the fact that most of it

Testimony 15

has been available for prospecting and mining and so on for well over a hundred years. Consider what is being mined now in Nevada. It is true that there is a considerable amount of gold, some silver mining in this State and, yes, Nevada is an important gold mining state. This is where the most values will be found.

There is also, of course, molybdenum mining. I guess it is not being mined right now since the Tonopah concentrator. I think it is operating, but I am not sure if there is any mining there. No molybdenum has been sold. No, that is not true. I guess some has been sold to Japan, but not much from that.

What I am trying to say, there is quite a bit of molybdenum in the State, not only in Tonopah, but Exxon has a rather large find in eastern Nevada. But my God, we have more moly than we know what to do with, and we are well into the 21st century.

Consider that Anaconda's operation in Tonopah is very much in doubt. It could only be resuscitated by a tremendous growth in our steel industry, which is unlikely to take place.

Furthermore, Moly Corp at Questa, New Mexico, has recently completed a third of a million dollar expansion and renovation program, a moly operation; the Thompson Creek operation in Idaho, development of this has continued about to the present. It may stop. This is of the same order of magnitude as the Tonopah operation; the exploration at Quartz Hill. The development of Quartz Hill in Alaska is continuing. This property is of the order ten times greater than anything that we have been talking about now.

Testimony 15

There is, of course, Crested Butte in Colorado which has not been developed; a large deposit on the Colville Indian Reservation in Washington, and so on.

That is what I am trying to say, is that we have so much moly that we really don't know what to do with it. Copper, there is a fair amount of copper, low grade, in Nevada.

You know, I have not commented about this too much, but I would like to take one small pot shot at a statement in the Egan wilderness technical report. At one point it says something about other companies supplying copper in the world market at an artificially low price. Come on now, does this mean that they are artificially upgrading the grade of their ores? But that actually has very little to do with my discussion here.

At any rate, what I am trying to say is that one could not expect a significant copper from the State of Nevada in the near future. There is a substantial amount of barite present and magnesite, some magnesite, one big magnesite operation, some gypsum. I am not certain whether there is a fluoride operation or not.

Some mercury, however mercury is a poor bet as long as Almaden, Spain exists, where the problem there is to keep from poisoning all of the workers from the mercury that oozes out of the rocks.

At any rate, what I am trying to say is that on that four and a half to six percent, chances of really finding something viable--or we could have some people out there tearing up the land, a single man with a bulldozer can do a lot of damage. We are not talking about anything really significant, in my opinion.

145

Testimony 15

Also, keep in mind, someone mentioned something about exploration geologists. Keep in mind that they are not disinterested observers, that their job depends on going out and looking. So, of course, they are going to say we have wonders here. Otherwise, you know, there is not much mining, really, in Nevada.

There is probably some things I have forgotten about.

Geothermal, you know, the geothermal deposits that are going to be developed are only those -- at least for the power generations -- are only those that are very large and have a very high temperature. They are not likely to be present on those little areas that we are talking about. That is that it is simply not going to be possible to run them, if one considers the laws of thermodynamics and so on, unless they are very, very large.

Now, it is true there are some operations around the State where lower amounts, smaller amounts of geothermal energy can be used for agricultural use and so on. But this can only take place very close to a railroad or a major highway. It will not take place in some of these more remote corners of the State.

My gosh, we can't even develop Steamboat Springs near Reno, right here, let alone some of this other stuff.

THE HEARING OFFICER: Can you conclude?

MR. SMITH: I am just about to finish.

At any rate, what I fear more than loss of mining opportunities is that we will not in the long run set aside enough wilderness areas, BLM, Forest Service, National Parks and so on, not certainly for the year 2100, perhaps not even

Testimony 15

for the year 2000.

And I think that we should set aside a reasonable amount here. More than we will really, much more than we are going to.

Furthermore, I do resent the whole idea, even though I am a mining man and mining has its place here on public lands, but public land should not be administered strictly for mining, as some of you would have it. Thank you.

Testimony 16

MS. SILL: My name is Marjorie Sill. I live in Reno, Nevada. I have lived here for 24 years. Tonight I am representing the Toiyabe Chapter of the Sierra Club, of which I am the conservation chair.

The Sierra Club, the Toiyabe Chapter has approximately 1,900 members in Nevada and California east of the Sierra Pass and part of Alpine Counties, and nationwide has over 300,000 members.

I am going to speak tonight to the general Resource Management Plan. The statement on wilderness will be given by our wilderness Chair., Roger Scholl.

These are very important items to the Sierra Club, because the Sierra Club has a multiple use bias toward the management of the land. We think a lot of things are important about the land. All of the uses you have heard mentioned here tonight, plus some other interests that you have not heard mentioned tonight.

And I am going to supplement my statement by a written statement, because it would be impossible to cover the document that was written, the draft EIS, in a statement of approximately eight minutes or so. So I am going to focus on some things that have been discussed in the management plan that particularly concern me.

One area that concerns me is the -- what I feel is sort of a disregard of the importance of riparian areas. Now, all of you know that in a state like Nevada, our water, our riparian areas, our meadows, our streams are extremely important. Probably more important than if you were talking about an area of high rainfall or something like that. Every one of these streams, our riparian areas is precious, not only for

Testimony 16

itself. I say it is precious for itself from an aesthetic point of view, but also as habitat for wildlife, for fish, for all of the things that we like to associate with living in Nevada, part of the Nevada heritage. It's so precious that it has got to be guarded very closely.

Now, in perusing this document, they have broken the resource area into zones. There are five zones altogether. I have made statistics on the condition of the streams: In the zone one, 67 percent of the streams are in unsatisfactory condition; in zone two, 28 percent are in unsatisfactory condition; in zone three, 50 percent are in unsatisfactory condition; and in zone five, 100 percent of the streams are in unsatisfactory condition.

It concerns me very much. Particularly when I read the preferred alternative and learn that there will be no short-term changes in the riparian condition. They are projecting beneficial long-term changes speculated, I presume, from the reading I have done, on better range management practices. But these are long-term range management practices.

There is no proposal to fence or in any other way preserve any of the streams or to stop the degradation.

In the proposal in the preferred alternative, they propose to reduce the wild horse herd by 30 percent, and I have not seen the data on which this reduction is based, so I really can't comment on this.

There is no proposal in the alternative to reduce any of the cattle grazing by any amount. Now, this may be perfectly all right. In fact, the only proposal, the only alternative which seems to create an immediate short-term riparian improvement would be the elimination of all cattle

Testimony 16

grazing, which we all know is neither a viable nor a desirable alternative.

But I do not see proposed the kind of management that I have heard ranchers talk about that would protect the riparian areas. It is proposed that they monitor them.

Well, in my opinion, if you have 50 percent of your streams or more in an undesirable condition, they have already been monitored. Something should be done about this particular problem.

And I am very much concerned that -- and it should be done almost immediately -- I mean, you can have degradation and degradation can continue. You can say yes, in the long term we are going to take care of some range management improvements here, but I haven't seen nothing in the document that gives me confidence that these problems are going to be addressed. That is one of my principal concerns with the document.

Another concern is the proposed disposal of land under the preferred alternative. Now, I can't think of anything that locks up land as much as disposing of it to private entities. And if we are talking about maintaining the present rate of AUM's or the -- we are talking about the possibility of miners and ORV people being able to go out on 95.5 percent of the area.

Why, if we cut the area by disposing of it to private interests, why then there is less area for this kind of thing. And I'm rather surprised at the figures which are shown here.

According to the preferred alternative, 79,888 acres are proposed for disposal to private entities. Now, it is not specified to what entities this private land will be sold.

146

Testimony 16

Certainly, part of it probably will be acquired by the City of Ely for necessary expansion. And I don't think anyone has any objection to that.

Part of it could be acquired by a rancher who needs a section to firm up his holdings. And I don't think anyone would have any objection to that.

But given the history of attempted Nevada land acquisitions, we find people coming in here who have none of the interests of Nevadans at heart and would be able to acquire -- would have the money to acquire large chunks of land. So I think that this disposal under the preferred alternative would be counter to the interests of all of us.

In the Alternative B of the proposed 39,555 acres, and even that amount sounds to me as if it is too large of a figure for the kinds of things that might be needed by the community and by the local ranchers.

So these are two areas that I have focused on. I need more time to study the document, but I congratulate the Ely District in putting out such a provocative document.

But at the same time I am concerned that we address the real questions of the best use of the land, which I think this is all about.

11

Testimony 17

MR. YOUNKIN: My name is Steve Younkin. I work for Sierra Pacific Power Company in Reno, Nevada.

I have a very brief statement, and that is to congratulate and commend BLM for its planning effort in a document that it has produced and its recognition and implementation of Section 503 of FLPMA, which addresses the issue. I feel that the Egan District has fulfilled the intent of Congress, which directed land managers to reduce the preparation of right of ways.

Sierra Pacific supports the preferred alternative with very -- with some exceptions and clarification and Sierra will provide detailed comments on that for the December 24th date

Testimony 18

MR. FORREST: My name is Jeff Conrad-Forrest. I live in Reno. I respect the BLM staff for their ability to professionally assess the Egan Resource Area. I think they appreciate the unique qualities of eastern Nevada, which are represented in the Egan and Schell Resource Areas with their Proximities to the Ruby, Schell Creek, and White Pine Ranges.

I support the preferred alternative resource plan
1 with modifications to the -- with modifications to the Riordan's
2 Well and Goshute Canyon area to include the areas outlined
3 in the wilderness alternative. Also, the South Egan Range
should be included as a wilderness area.

The wilderness alternative for this area has eliminated most of the mineral and cherrystemed road conflicts.

In summary, the Goshute Canyon, South Egan Range, Park Range and Riordan's Well, including the modifications stated previously, are only 4.5 percent of the resource area and should be administered as wilderness.

As a postscript I would like to say that wilderness values are appreciated by more than just hikers. There are philosophical and psychological benefits which are important to many people. Thank you.

Testimony 19

MR. SCHOLL: Good evening. I am Roger Scholl from Reno, the wilderness committee chairman for the Toiyabe Chapter of the Sierra Club.

The Toiyabe Chapter appreciates this opportunity to comment on the Draft EIS/Resource Management Plan for the Egan Resource Area. My comments represent the Chapter's suggestions only on the wilderness resources under consideration.

BLM is to be commended for recommending in its preferred alternative portions of three of the resource areas four WSA's, wilderness study areas, as suitable for wilderness preservation.

Each would make an outstanding addition to the wilderness system. However, we urge that BLM in its final decision adopt a modified version of the wilderness emphasis alternative, which includes a portion of the South Egan Range WSA.

The massive limestone cliffs, fir, and bristlecone pine forests, caves and excellent wildlife habitat make this a spectacular wilderness.

The wilderness emphasis alternative boundary has almost all of the high wilderness values, yet excludes most resource conflicts except possibly some range developments and vehicle routes in the center of the area.

But, livestock grazing and some range improvements are allowed. So BLM should strongly consider recommending even this part of the area.

We are especially gratified to see part of the Goshute Canyon WSA recommended by the BLM. We have followed this area carefully from the inventory stage and the wilderness review process. I believe it contains some of the

Testimony 19

highest wilderness values that the BLM manages in Nevada.

With the extensive forests, including bristlecone pines, peaks of 10,500 feet, rare spotted bats, Utah Cutthroat trout, the area is truly outstanding. We urge the BLM to extend its recommendation to include all of the land in the preferred alternative plus the south end down to at least the area that existing information indicates has high mineral potential.

While there are indications that much of the south end of the area has moderate potential, this is not the stage of the process for BLM to exclude it on that basis. Only areas recommended suitable now will have the benefit of the USGS mineral survey which will better define potential for mineral development.

When an area has such a high wilderness values as the Goshute Canyon, boundary decisions should be made later in the development of administration recommendations with the benefit of added information on possible mineral potential.

It is, after all, only a sketchy idea of mineral potential that we have at this stage. In fact, there are not even any mining claims in most of the area rated as moderate potential. Yet we know the wilderness values are truly outstanding.

The BLM's recommendation for the Park Range in the preferred alternative is excellent. This remote rugged area has virtually no resource conflicts, but has wilderness values that are essentially untouched by man including rare, pristine meadows. We heartily support it.

The BLM's preferred alternative recommendation for

Testimony 19

3

the Riordan's Wells WSA is also good, but would be improved by expansion to include the wilderness emphasis alternative boundaries plus adding about 4,000 acres of rugged land on the west.

This recommendation would fill an important wilderness corridor between the Grant Range, national forest recommended wilderness, to the south and the BLM's wilderness recommended to the north.

In conclusion, we urge that the BLM recommend portions of all four WSA's as outlined above. We feel four to five percent of this vast 3.8 million acre resource area is wilderness, preserving that much is wilderness, while leaving some 95 percent available for all other uses, including mineral development, will in no way cripple the mining industry or other uses of public lands.

In fact, we contend that recommending some five percent of the resource area as wilderness and four widely scattered areas will only provide some semblance of a reasonable balance for protecting the remaining wilderness values in the Egan Resource Area while providing for other uses, other multiple uses of the lands. Thank you, again, for this opportunity to present our comments.

Testimony 20

MS. MAZZA: My name is Amy Mazza. I live in Reno, Nevada.

I think the BLM has done an excellent job in studying the Wilderness Study Areas in the Egan Resource Area. I support the wilderness recommendation for all four: The Goshute Canyon, the Park Range, the South Egan Range, and the Riordan's Well.

The wilderness resource of the Park Range has long been recognized by the BLM. I remember before FLPMA was passed, it was high on the list, high on a list of primitive areas proposed in the State Office. I totally support the BLM's proposal for the Park Range.

3 I have hiked in the Grant Range both to the north and to the south of Riordan's Well and experienced an awesome beauty there. I support expansion of the WSA on the southwest. It makes much more sense to me to protect the known resource now and to allow the USGS to study this mountainous portion to see if a sufficient economically productive mineral really does exist there.

147

2 I believe this is also true of a couple thousand acres in the southern portion of the Goshute WSA. The South Egan Range is, as Charlie Watson pointed out, possesses pristine wilderness and natural features. It should be recommended for wilderness by the BLM. These four areas are in effect wilderness now and it is not injuring our local economy,

Further, even though I am not a hunter, I think that some hunters also need areas not roaded up. In addition, not all Nevada ranchers are against wilderness and it has a positive value of protecting their grazing lands from some of the troubles that vehicular access can bring.

Testimony 20

If there is, as Bob Warren said, a so-called business bias against mining in this document, I think it is because it is such a change. For the first time this process is the first time that in the history of the west that BLM is giving wilderness a fair shake. It is really looking at the wilderness value and what is the wilderness value.

And I think that is a hard change, because for so long the west has not been interested in preserving itself. It has been destroying itself.

But I believe wilderness is just as important as mining. As Aldo Leopold said, something like, "What good are 40 freedoms without a blank spot on the map?" What good is the standard of living and material things that mining gives us if we destroy the beauty of spectacular places like these four WSA's?

In this materially dominated world, I think we need beauty. I think we need a passion for beauty if we are going to -- if our race is going to exist in the future. Thank you.

Testimony 21

MS. TANNER: Well, if I can decipher these notes tonight, I might have something to say to you. My name is Karen Tanner and I live in Reno and I am speaking just for myself.

I am a school teacher, an elementary school teacher. In school the other day we were having a discussion in social studies. I teach three of the fifth grade classes social studies, because we trade four different subjects, and we were doing sort of an overview of the whole United States and talking about the different natural regions and what each of those regions had to offer.

We were talking about the natural resources of the land as a whole and, gee, why were people interested in coming there from Europe. And so we began listing what things land had to give us. I like to teach by asking questions rather than telling the children.

So we were listing them on the board and they were giving me some ideas, and we listed forests, and water and minerals and oil, and gas and coal.

Then one little girl raised her hand, and she is sort of a slow-speaking child, and she kind of is slow in a lot of ways, but she said very quietly, "Beauty."

And I said, "What?"

And she repeated it. She said, "Beauty."

I had never had this come up before and I have been teaching nine years. I thought: Well, yes, Erica, you really have a good idea there.

And then I asked the children, "Well, can the land be valuable just for itself; is beauty a value?"

And we did discuss that for a while and there

Testimony 21

were different opinions on that. I won't go into that right now, but it really points out how we are at sort of a turning point right now in that our historical perspective has always been one of needing to use the land for its economic benefits, and now we are just -- this whole inventory is sort of a symbol of fact beginning to change and develop a land ethic now that we are finally running out to the end of our land, that perhaps there are other values besides the economic value.

Well, all that just sort of gives you an indication that I, of course, will be speaking in favor of wilderness. And, so to speak specifically to your proposal, I would like to say that I think you did a really fine job and I like your preferred alternative, although I would make additions to that.

The Park Range is fantastic. That is great. I don't see any resource conflicts there. The wilderness values are high and that is just a real -- that is a shoe-in. That is great.

3 Riordan's Well, I would -- I would ask for the whole thing. I think that while down in the boot-shape unit it does have some mineral potential on that, that is speculative. And in the north, I think it is very important that this area is adjoining to the Blue Eagle Unit, which is also a WSA.

And I think that in the preferred alternative that boundary is pulled back away from the Blue Eagle Unit, and I think that it should be maintained adjoining in the hopes that perhaps we can make some kind of a significant complex some day, maybe even to the point of closing that road. I think we have a great opportunity there.

Testimony 21

1 Let's see. The Goshute Canyon is a beautiful area. Your proposal is good, but I think what we really need is, again, the whole thing.

In the south it is quite scenic and it is known, the whole area is known for its wilderness qualities. The conflict is, again, mineral. And, again, I would say that that is speculative and we really need to find out more about that before we cut so much out of the Goshute Canyon Unit.

2 And last of all, the South Egan Range. I would propose that we keep a portion of the South Egan Range and that we go with the wilderness emphasis alternative. It is highly scenic, especially the nine mile canyon area. I know that there are a lot of conflicts with this area. I know that there are a lot of cherrystem roads, but I think with the wilderness emphasis alternative, that where you pull back the boundaries to that western bench, that you have eliminated the majority of the cherrystem problem, granted there are still roads penetrating the central portion, but these roads are of a low quality.

I think that we -- that this area is important enough that we should consider some other alternatives, whether it were to break this unit up into two separate units and consider them that way, or I would prefer that perhaps those roads -- those portions of those roads be closed.

And, last of all, I would like to re-emphasize like so many people have done, that we are really talking about a very, very small portion of this entire resource area. My proposal is just a little over four and a half percent. That is just negligible, and if you were really to be truly democratic and divide this area up amongst the different

Testimony 21

multiple uses that are listed in the organic act; what are there, maybe four or six different amounts? Maybe wilderness should be getting 20 percent or 25 percent. So I think four and a half percent is a very small percentage to ask.

Also, I think it is very important to note what Roger had said, that if indeed these areas are recommended, that the USGS and the Bureau of Mines are then required to do an intensive study of these areas for their mineral potential.

I agree with Bob Warren that the mineral study so far is highly inadequate and they do need to be able to be looked at much more thoroughly. So I think it would be to everyone's benefit to have these areas be recommended and then have a thorough study done and then make the final decision.

Last of all, I would just like to say that -- conclude with a thought that we should really begin thinking of not just ourselves and our particular lifetime, but our future generations.

I have two teenagers and am contemplating grandmotherhood not too long down the road, and I would like to think my children and their children and even 200 years from now, my distant relatives will be able to have some sort of choice in what is to be done with our land.

We are down to the very last little bit of it that we are looking at now and that is like our money in the savings bank. We are faced with the choice now of whether we are going to spend all our savings now or hold some of that in trust.

So I would say that if we err -- I think we should err on the side of wilderness, because once that land is opened, it cannot be returned to a wilderness state. But if it

Testimony 21

is protected as wilderness, it is not locked up. It is just held in trust for a future decision. Thank you.

Testimony 22

MR. MILLER: My name is Glenn Miller. I live at 1850 Pryor Road in Reno. I would like to speak generally for wilderness and in the preferred alternative in some cases and the wilderness emphasis in some other cases.

First of all, I would like to make a couple comments generally about the wilderness process. As I am sure you are well aware of, the wilderness progress has been going on for quite some time now. And in that progress, lands have been gone through various processes of wilderness study. And the lands that have been excluded up to now, in some cases are areas that we felt -- conservationists felt that should have been retained.

A couple of those areas are an area in the Egan Range, which is Martin Spring, and also the north part of the Goshute Canyon Range to the north of the large road cut.

These areas are very high and very spectacular and have wilderness qualities that we feel should have been retained. The point is that a lot of land in the Egan Resource Area has already been excluded into what has come down to a very, very, I think, a fine line or a very detailed consideration and exclusion of a lot of areas. So what remains are areas that do, indeed, have dramatic wilderness potential.

First of all, I would like to support strongly the Park Range proposal. It has a special primitive character that exists in very few places in the lower 48 states. There is, indeed, very very few areas in the entire world at this time that are as remote and, I think, as pristine as the Park Range, from an academic perspective, which is what I have the areas --

Testimony 22

the areas have offered tremendous research potential in the years to have some areas that exist today and will hopefully exist in the future as they existed a hundred, two hundred thousand years ago.

I think it is very important to have that biological and genetic research available in those kinds of areas which exist in very few other places.

3 Second, Riordan's Well, again, it has been expressed before. It is a very fine land north of the Blue Eagle recommended wilderness and also the Forest Service Grant recommended wilderness. And I feel that could be very easily extended to the west to include the wilderness emphasis alternative. There are very few conflicts in either of the first two.

In the South Egans also we would very much like to see recommended, wildlife emphasis, as you are well aware is not recommended, but the Egans is an area I have hiked in and was particularly impressed with the spectacular and high nature of Egan, which is unlike a lot of the BLM areas that have been considered around the State.

It is a pine forest. It has running water in many cases, and the wildlife resource - which is tremendous.

2 Again, the South Egans should be recommended. It is part of a chain of mountains and it extends quite a ways up. I think there should be aspects of that range protected over the long term. It would require some firm decisions, resource decisions, but certainly there is an area that could be taken -- that could be recommended with very little conflicts, particularly in the north.

Testimony 2 2

And, finally, the Goshute Canyon area is an area, I think, there has been some concern about. It is an area of particularly high wilderness value. It has high classic wilderness values. Ask the general population what kind of an area would you think about wilderness and they would talk about an area such as the Goshute Canyon.

It has fishing qualities, hunting qualities that will best be retained by having a very unroaded area.

I hiked last weekend with my two girls and my wife in an area around Reno that had previously not, obviously, and will not be declared a wilderness, close to Reno, and it had -- it seemed to have roads go everywhere. There was not, I don't think, from what we could see, there was not even a quarter of a mile of open country that was not roaded. It was a very nice area, but, obviously, there was no experience of solitude or no wilderness experience in that area, although this was very pleasant to walk in.

I think a four percent recommendation of the resource area is certainly not an overestimation of the amount of area that could be recommended.

Lastly, in the Goshute Canyon area, I would like to see the south wilderness emphasis and an overlap of the wilderness emphasis and the recommended -- the preferred alternative be included. I even think the wilderness emphasis is not including enough land to the south. Certainly, there are some mining conflicts in the very far south. I think they can be excluded. They can be drawn around, but the rest has certainly high wilderness values.

From a mining perspective, I can understand criticism if an area like Alligator Ridge was recommended,

Testimony 2 2

because of the very high mineral potential in that area. It is not and clearly should not be. It has high values for the minerals industry and I don't think anyone is proposing that it is; it is what is -- the use of that land is as it should be. It is a mineral production.

But the areas that are under consideration now, none of them have high wilderness potential. There is only a small percent that even has a moderate potential. And a lot of them have really essentially no -- excuse me -- have high minerals, very, very little of it even has a moderate minerals potential, and most of it has a very, very low mineral potential.

And I think that the -- on a balancing thing, and this is what I think everybody is interested in, a four percent recommendation is not very large.

Finally, what we are balancing in most of these areas, all of these areas is a very known and well established wilderness value against a highly speculative mineral potential, and I think in this case with all the other areas that have been excluded, going with the known wilderness resources is the obvious and correct decision. Thank you.

Testimony 23

MR. HORNBECK: Thank you. My name is David Hornbeck I am a resident of Reno. I am an attorney here in Reno. I am speaking on behalf of myself.

First of all, I would like to congratulate the Ely District for a very comprehensive and well thought out analysis of this Egan Resource Area. Basically, or in general, I would like to support the preferred alternative with some additions and generally those additions would follow along with what has already been referred to a number of times this evening as a conservations' alternative list With additions from what would be the All Wilderness Alternative, although not all of it.

With respect to the Park Range, I have no quarrel with that whatsoever. I think that is a fine decision.

3 With respect to Riordan's Well, I feel that the addition of the area that connects to the Grant Range and the Forest Service areas should be included for the reasons earlier stated. It has an ability to make a better continuity wilderness areas, an area which also contains a raptor habitat.

I refer to the technical summary or technical analysis on page 103, when it points out--this is in the All Wilderness Alternative, that with respect to the mineral aspects of the area, there are nominal adverse impacts of making that entire -- entirely wilderness area.

There are only 2,950 acres which indicate a moderate level. And this does not raise the level of a significant impact as indicated by that definition on page 95 of the draft plan.

I would point out that on page 122 of the draft plan, with respect to all of these areas there is an analysis of mineral impact for the All Wilderness Alternative. And in that listing there are no significant impacts in any of these

Testimony 23

areas to minerals by the definition you've adopted with the exception of the Goshute Canyon Area at the south end -- I assume of where they are the high and moderate potential and, therefore, enough area over the 5,000 acres to constitute what you would define as a significant adverse impact there. I will get to that in a moment.

148 But with respect to the Riordan's Well, I think that the advantages certainly outweigh the disadvantages including all of that area.

149 With respect to Goshute Canyon, in the technical report on page 85 it points out -- or it mentions that the BLM does not really know what the mineral potentials are there.

150 It also points out that ore bodies are estimated to be too small to be of interest to large modern corporations. Coupling those two facts, I think that the prudent thing to do is to go ahead and recommend a greater area except for those definite and existing claims that are, in fact, in operation at the very south end.

I notice in -- I can't turn to the map at this instance, but I was noticing one of your maps that indicate essentially all of the claims are post FLPMA with the exception of the very few in the very southern part. So I think there would be no great difficulty in following a procedure that way, designate a far greater part of the area excluding only those parts at the very southern end where there is actual activity.

147 And then let the USGS make its survey, and then perhaps you will have a better idea and better picture of what is there rather than just making assumptions.

Testimony 23

I know Bob Warren is critical of some of the -- I think it is the GEM report -- and perhaps well he should be. And, therefore, since that is the data you are going on, I suggest that that -- I agree with you in that if this isn't good data, we should wait until we have good data before we make these management decisions.

With respect to the South Egan Range, you obviously have excluded all of it with which I disagree. Particularly in -- let me refer to the page. Well, that is a portion around page 121 referring to the wilderness aspects of the South Egan Range. I guess this is the section on Alternative B, which covers the All Wilderness Emphasis Alternative.

Under the manageability, which appears to be the only real problem that you have with the South Egan Range, I point out that it is only a thousand acres of this area that is involved with possible mining activity. There is the one possible inholder with potential for building a road. And I would suggest that it may be premature to assume that such a road be built, because quite possibly when these areas are designated there are other alternatives.

For example, to use land transfers or outright purchase the land from the inholder to consolidate the area.

The other point is that it would be difficult to manage off-road vehicle access. I submit that this area is far too valuable an area as a wilderness area to allow these potentials or problems and supposed management problems, which are not perhaps realized at this point from stopping at this stage from designating it and then dealing with the realities of what may happen later.

59

Testimony 23

In the technical report, I would point out that there are a number of positive aspects to designating this area as wilderness that you list. For example, the existing access development that I refer to, the 40 acre parcel, you state that there would be a loss of naturalness and opportunities for solitude which will result immediately adjacent to road access, but this will not affect the area as a whole. And that the non-conforming developments on many of the adjacent parcels of private land are possible but not likely.

I submit that it is not likely that this would occur either with reference to the fact that there are beneficial impacts occurring both long- and short-term for the area as a result of wilderness designation, and that is your conclusion.

As far as the minerals go, you point out that the ore deposits are too small to be of interest to the large mining companies, and that is also listed as not a significant area, as I mentioned before. There is no significant mineral impacts or energy impacts in any of the areas except Goshute Canyon.

As far as range goes, these would be minor impacts. As far as wildlife, this is a positive beneficial aspect for wilderness designation.

You also list the adverse impacts on forestry which involves, apparently, local cutting of Christmas trees. I think there can be alternatives to that.

The really, the White Pine Power Project, I wasn't under the impression that this was right on this. There is no direct interference, as I understand it, between the area and the White Pine Power Project. And there are alternatives

151

Testimony 23

available to the routing and so forth for the access.

2 There is the one Desert Land Entry that you refer to, and also a mention of possible coal delivery systems and the like. In my opinion, the values of the South Egans far outweigh these supposed and tentative problems that may or may not develop. Therefore, I would recommend that it be included as a recommended area for more intensive and further evaluation.

In summary, I have to agree that I think 4.5 percent of a 3.8 million acre resource area is a very small area indeed. And I would point out that the winnowing process has been going on for a long time. I always find it somewhat incongruous that when one speaks in favor of wilderness, one has to come from the standpoint of proving that this is a superior use of the land than some other; whereas if we apply the same requirement, let's say to mining, that say this entire area of the resource area is going to be considered wilderness unless you can prove that there is a better use and prove that there is a mineral use there that exists.

In fact, I think that would put the shoe on the other foot and we would have far larger areas designated wilderness. After all, the wilderness is compatible with almost all of the multiple uses that the Congress has designated for the management of our public lands, whereas mining is essentially a totally exclusive use.

There isn't much grazing in a mine; there isn't much watershed in a mine; there isn't much wildlife habitat, riparian areas, or anything of this sort in a mine, for example. So I think that the public interest is best served by a use of the land that is truly in multiple use.

Karen's comments about her children and spending

Testimony 23

your savings versus putting it in a trust reminded me of another point. That is that from a conservative standpoint, I feel that our national interests are much better served by placing some of these mineral resources in trust for future generations as well as wilderness. Wilderness can always be undone to get to the mineral resources.

Once we have exhausted these non-renewable resources, we are then, perhaps, in a much greater position of being dependent upon others, whereas -- in the world -- whereas if we save these natural resources and approach a policy of stockpiling sources from outside this country, I think we would be much better served in the long run, because then we would have not only wilderness in trust for future generations, but minerals as well.

And if, in fact, those minerals were there and if in fact there is some time when those minerals become crucial to us, then we can always get them, if in fact we can find them. Thank you. That concludes my remarks. Thank you.

Testimony 24

MR. BUCHANAN: My name is Glenn Buchanan from Reno and everywhere else. I have done a lot of prospecting and a lot of mining, but the actual principle behind the whole thing with the Bureau of Land Management and mining is a subject by itself.

4 | The country needs the minerals and the forests and the terrain. In other words, different formations to draw the eye, but we have to stop to remember that the minerals is what we live with. And if you cut the minerals out, you have cut everything out.

The other amendments put up by the BLM in the past, deregulated and didn't permit inference. You who are speaking in favor of this maybe sorry later, because you may not be able to get into that land as easy as you think.

That is about my comment. Thank you.

Testimony 25

MR. LORSUNG: My name is Gordon Lorsung. I am from Reno and I represent me.

I have sat here tonight and listened to a lot of talk about preserving the land and about mining it. And I haven't heard anything about what I like to do, which is drive.

93 | I am a little crippled up. I don't walk well. I like to see these pretty sights around the country. And if you take the roads away from me, I don't get out there and I don't like that.

I think I have got pretty much as much right as anyone else to see them. That is about all I have to say.

BLM RESPONSES

**RESPONSE
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1

The Goshute Canyon WSA has high wilderness values, but it also has high mineral values concentrated in the southern third of the area. The Preferred Alternative for the area is a compromise recommendation that attempts to preserve the highest wilderness values, but also excludes the portions with the highest mineral potential. Inevitably, some of each resource value is foregone, but the Preferred Alternative is believed to be the fairest way of dealing with the conflicting resources and uses.

2

Several factors influence the recommendation for the South Egan Range WSA. As reported in the Wilderness Technical Report, designation of the entire area would create some very tenacious manageability problems. Some of these would involve conflicting resource uses, such as mining on the north end and forest product harvest on the north and west bench.

Yet, reduction in the size of the suitable area (considered in two different alternatives) to eliminate manageability problems and conflicts would substantially affect the quality of the area's wilderness values. The recommendation contained in the Resource Management Plan is considered to be the most reasonable alternative for the WSA.

The BLM does recognize that the South Egan Range contains highly scenic portions and many opportunities for recreation. The area will be given special attention for possible recreational developments and will be managed in a manner to preserve these special values.

3

The most important values in the Jordan's Well WSA, including the scenic areas, raptor habitat and ponderosa pine, are contained within the BLM's suitable recommendation for the area. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

4

The Preferred Alternative recommends that 106,216 acres, or 2.8 percent of the Resource Area be designated as wilderness. This leaves 97.2 percent of the Resource Area unaffected by wilderness designation. This is not considered to be an excessive recommendation. The economic and social impacts which would result from the recommendation have been thoroughly considered. All available information indicates that impacts would be insignificant to all sectors of the local and state economies.

5

The basis for the BLM's wilderness review has been the Wilderness Act of 1964, passed by the U.S. Congress during the early Johnson Administration, but conceived during the days of the Eisenhower and Kennedy Administrations. This Act sought to ensure recognition and protection for one particular legitimate use of the land-wilderness-within a multiple use framework. It applied to Forest Service and National Park Service lands. The Federal Land Policy and Management Act, passed by Congress in 1976, directed the Bureau of Land Management to conduct a wilderness review of the lands it administers in accordance with the guidance set forth in the Wilderness Act. The BLM's "ground rules" for developing wilderness recommendations were issued in February 1982, with the publication of the "Wilderness Study Policy; Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands." This policy was issued during the present administration. The specific procedures for inventory and wilderness study were developed only after lengthy and wide-ranging public comment periods were held throughout the nation. These extensive efforts were made to avoid bias of any sort in the process.

RESPONSE
NUMBER

RESPONSE

6

The assessment of mineral potential has been given top priority in the wilderness studies. Not only is this policy, it is mandated in the Wilderness Act and the Federal Land Policy and Management Act. The best information available to the BLM at this time indicates that withdrawal from mineral entry of the 2.8 percent of the Resource Area contained in the preliminarily suitable areas would affect the mining industry very little. However, this analysis is just the beginning. Every area that is found suitable for designation must undergo an extensive mineral survey conducted by the U.S. Geological Survey and the U.S. Bureau of Mines. New findings can affect the suitability recommendation for any WSA. The redundancy and intensity of minerals impact analysis is designed to avoid any major economic dislocations.

7

The Bureau of Land Management's Wilderness Study Policy explicitly states that "no buffer zones will be created around wilderness areas to protect them from the influence of activities on adjacent lands" (11.B.9). The bill currently before Congress applies only to National Parks.

8

The discussion on the "Designation of Management Zones" only refers to the potential for corridor designation without discussing specifically what is to be in them and without regard to any specific alternative. Further, the corridors shown in the Egan Resource Management Plan have been purposely drawn wide so that a particular corridor will be able to accommodate several types of specific corridors (i.e., transmission, railroad, and pipeline) while still allowing flexibility in the actual placement of facilities. The proposed resource management plan has been revised to enlarge the east-west utility corridor to the Machacek Substation to allow for the corridor needs of the White Pine Power Project's Butte Valley site.

9

The National Environmental Policy Act requires that Environmental Impact Statements develop an array of alternatives. Each alternative represents a different management philosophy. This approach allows the reader to see the possible range of management actions and serves as a basis for the analysis of positive and negative effects of each alternative. Alternatives A, B, and E were developed to meet this legal mandate and are not being proposed for implementation due to their adverse impacts.

10

Requirement 24 is a standard operating procedure developed by the Western States Fish and Game Commissioners. This procedure is consistent with the Memorandum of Understanding between the Bureau and the Nevada Department of Wildlife. These guidelines do allow for site specific evaluation with flexibility in modifying the restriction based on the site specific analysis.

11

Many comments were received expressing concern that the amount of land designated for disposal under the Preferred Alternative was excessive. After review the Draft RMP/ EIS, it was determined that the disposal of up to 39,555 acres of land would provide for more effective management of the public lands. Please refer to Chapter 2, The Proposed Resource Management Plan, for more details.

RESPONSE
NUMBER

RESPONSE

12

The projected increase in AUMs is based upon the implementation of grazing systems, whose success might depend upon the development of range improvements. Grazing systems and improvements may take several years to fully implement and several more to show significant improvement. The impacts of not implementing grazing systems and range improvements have been analyzed in Alternative A (DRMP/EIS) and were found to be not acceptable.

13

State Directors have been delegated authority to approve and file grazing EISs. This includes the authority to determine which alternatives will be addressed, subject to applicable laws, regulations, and policy.

Public Law 91-190: National Environmental Policy Act (NEPA) of 1969, Section 102(c) requires EISs to address "The Environmental Impact of the Proposed Action," and "Alternatives to the Proposed Action." The Council on Environmental Quality Regulations, Part 1502.14(a) states that the agency will "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated."

Letters from Natural Resource Defense Council (NRDC) to BLM have stated:

"It should be noted that no grazing alternative is useful because, if properly analyzed, it will provide essential baseline environmental information against which to measure the results of all other alternatives considered, including the proposed action, and "...one of the basic questions to be addressed by these and all other grazing EISs is whether any level of livestock grazing should be allowed, and "...the draft should consider the alternative of eliminating grazing on all lands of the study area."

We agree the no grazing alternative may not be realistic, however, it does serve as an analytical tool for providing baseline environmental information and the no grazing alternative (Alternative E) will remain as an alternative in the Egan RMP/EIS.

14

The market value of a public range AUM, its derivation, and lack of official recognition by the Federal Government, is discussed on page 77, paragraph 5 of the draft document. This immediately precedes the discussion of the paragraph in question.

15

Pages 93-95 of the draft document gives an explanation of the criteria for each resource as to what impact was significant or not. These criteria were developed from resource specialist knowledge and professional experience and judgments as explained on p. 93 of the DRMP/EIS.

16

Future actions for determining livestock and wild horse numbers and habitat available for wildlife will be based upon data obtained through the monitoring program and will consider recommendations made through the coordinated resource management and planning process. Grazing decisions may ultimately be prepared to determine this. These decisions will be developed and implemented after consultation with affected permittees, other rangeland users, intermingled landowners, involved state and federal agencies, district grazing advisory boards, advisory council, and other interested parties. Agreements will also be made between BLM and permittees which will establish livestock numbers.

17

Site-specific maps and narrative are available in the Egan Wilderness Technical Report, available upon request as mentioned in several places in the Egan Resource Management Plan.

RESPONSE
NUMBER

RESPONSE

18

Except in a very few cases, it is impossible to say absolutely whether or not minerals exist in an area without spending many millions of dollars and impacting some of the values which are being considered for protection. However, the confidence with which assessments of potential are made can and have been ranked, and these rankings have played a part in the final recommendations contained in this document.

19

Resource area-wide surveys are desirable for conducting wilderness studies, but in the case of the Egan studies were impossible to attain because of funding and time frames. (They have been available for other studies, such as those for the Schell Resource Area in the Ely District.) There is nonetheless some explicit judgement about the relative abundance of outside opportunities in the selection of the Preferred Alternative and in the statements about its impacts on energy and minerals.

20

Unlike wilderness areas, ACECs are not necessarily areas in which no development can occur. An ACEC designation is not a mineral withdrawal; withdrawal authority is retained by the Secretary of the Interior. The BLM did not find that ACEC designation of nonsuitable wilderness acreage in the Egan Resource Area was warranted.

21

During the issue identification phase in which the public was requested to submit their concerns, cultural resources did not surface as a major problem in the Egan Resource Area. Therefore, cultural resources was not considered a critical issue requiring specific management direction within the RMP/EIS. However, cultural resources is considered an important program and is still operating under normal administrative procedures as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA), the National Environmental Policy Act of 1969 (NEPA), and the National Historic Preservation Act of 1966. Chapter 3, the affected environment, has been expanded in this document to include more cultural information.

22

BLM's "willingness and procedures for undertaking site specific surveys of all planned projects within the area" has been addressed under Standard Operating Procedures Number 4 in Chapter 2 of this document. A cultural resources section has been added to the affected environment chapter and Impacts chapter in this document.

23

The "sensitive resource" issue was dropped during the scoping process since existing laws and regulations proved sufficient management direction for the issue. Any action which could affect habitat critical to threatened and endangered species would receive Section 7 consultation through the Fish and Wildlife Service. Please refer to Standard Operating Procedures Number 3 for more details.

24

A range of alternatives was developed through public consultation and coordination. The draft RMP/EIS contained not only these alternatives, but a Preferred Alternative. The Preferred Alternative was developed after a review of the range of alternatives and differs enough from Alternative C, e.g., wild horse numbers and wilderness acreage that it was more accurate to include both.

25

The definition of these terms may be found in the Glossary section of this document.

26

In dealing with the subject of range condition, past grazing environmental impact statements and resource management plans have analyzed it as forage condition and/or ecological site condition. The first, analyzed range condition based upon the preference or desirability a grazing animal, usually livestock, would have for the present plant community and included a soil erosion criterion. The three condition classes identified under this system are good, fair, and poor. The later method compared the relative degree to which the kinds, proportions, and amounts of plants in the present community resemble that of the potential of climax plant community for a particular ecological site. There are four condition classes identified in this method excellent, good, fair, and poor. It should be noted that classes used in one system do not correspond to classes in the other. For instance, a site in excellent ecological condition may be in poor forage condition and so on. The Soil Conservation Service National Range Handbook defines range condition as follows: "Range condition is the present state of vegetation of a range site in relation to the climax (natural potential) plant community for that site. It is an expression of the relative degree to which the kinds, proportions, and amounts of plants in a plant community resemble that of the climax plant community for the site. Range condition is basically an ecological rating of the plant community."

This Handbook also explains how range condition is determined, as follows: "The range condition of areas within a range site is determined by comparing the present plant community with that of the climax plant community, as indicated by the range condition guide for the site."

In both approaches, the condition classes imply a connotation of value, i.e., good, fair, etc., for an area. It is often not an accurate interpretation since it is based upon a comparison to some potential or ideal vegetation composition without considering such factors as existing or proposed uses and management practices.

As a result, when it is time to begin implementing specific management practices or activity plans, there may not be much correlation between the proposed or preferred vegetation conditions discussed in the environmental impact statement or resource management plan and those managed for during implementation. For example, in the pinyon pine or juniper vegetation types, which are common in Nevada, the potential or climax (excellent ecological condition class) often has a high percentage of sagebrush and mature pinyon-juniper trees with little palatable understory vegetation (poor forage condition). If the existing or proposed use in the area is for mule deer and livestock, management for a condition class other than excellent, i.e., fair or good, may be what is actually done in order to gain understory plant species. Essentially what this involves is managing for the particular vegetation seral or successional stage that best complements the uses planned without adversely impacting the resource.

Succession as it is used here is a process whereby environmental factors such as fire, climate, grazing, etc., cause changes in the proportions of plant species present in a community or the complete replacement of one plant community by another. The changes are measured in relation to a potential or climax community. A plant community with a distinct species composition would be considered a seral or successional stage.

The Egan Resource Management Plan will not be discussing condition as has been done in the past. Instead it has incorporated a system based upon professional judgement in lieu of adequate vegetation condition inventory data that analyzes estimated successional vegetation composition classes as they relate to the uses proposed on the public lands. It is believed that this is a more realistic approach and will facilitate a more useful planning document for setting guidelines for implementation.

RESPONSE
NUMBER

RESPONSE

27

A large share of funding to be used in range improvements comes from a portion of grazing fees mandated by law to be spent in the originating district. The wells, springs and reservoirs planned will have definite benefits for wildlife. The very limited wildlife project funding will be used to construct guzzlers (water catchments) specifically to benefit wildlife. Please refer to response 16 for more information.

28

The Nevada Department of Wildlife has the lead responsibility in identification of bighorn transplant sites. No sites have been identified in the Egan Resource Area to date. Nevada Department of Wildlife with BLM assistance will prepare site release plan(s) with public input. Once populations are established, Habitat Management Plan(s) will be prepared.

29

Monitoring efforts will be intensified on both stream and other riparian areas to determine the extent and cause of any overgrazing or impact to fisheries habitat. Management plans will then be prepared to, among other things, correct any overgrazing. These plans could include the implementation of grazing systems, development of various range improvements, and adjustments of livestock and wild horse numbers. The implementation of properly developed grazing systems has proved to be an effective method to improve riparian habitat. In some instances grazing systems coupled with other measures may be necessary to improve riparian areas. Until each specific activity plan is written, it is impossible to predict each range improvement. Improvements will be incorporated into grazing systems and will be handled on a case-by-case basis.

30

These are very valid concerns expressed regarding this alternative. For these and a great many other reasons, all valid, this alternative was not selected as the proposed resource management plan. It should be noted that Alternative A, like Alternative E, is for analysis purposes. There would be similar contradictions between these points in the RMP implementation and Alternative E, i.e., selective management would lose its significance, many resource conflicts would be eliminated, and grazing adjustments and AMPs would not be necessary.

31

Selective management is, essentially, a bureau-wide land categorization process designed to help Bureau personnel to prioritize efforts to implement the rangeland management program and assign management priorities among allotments or groups of allotments within a planning area. Selective management provides broad policy guidelines within which managers have the flexibility to consider local resource conditions, rangeland uses, and the management capabilities of field office staffs when developing and implementing a grazing management program. Within the framework of the planning system, District Managers have the latitude and responsibility to conduct progressive inventories and/or monitoring studies needed to make increasingly complex decisions. District Managers also can progressively issue decisions, vary the intensity of management efforts, and establish investment priorities among allotments or groups of allotments so that available funding and personnel are most efficiently used. The latitude and responsibility to vary these management actions in response to the local resource situation is the basis of selective management.

Selective management recognizes that: (1) an allotment's (or area's) resource characteristics, including its potential for improvement, can be identified; (2) these characteristics define the allotment's management needs and imply a reasonable intensity

**RESPONSE
NUMBER**

RESPONSE

of management efforts; and (3) limited management capabilities are best invested when the priority and intensity of management actions for and among allotments respond to their management needs and potential for improvement. Potential for improvement is the capacity of an allotment to produce a positive return on investments within a reasonable time period. Positive return can be viewed in terms of increased resource production or resolution of serious resource-use conflicts.

It is somewhat misleading to say that habitat improvement will occur on only 29 percent of the allotment. Please refer to response No. 88 for a clarification.

32

Water will be left at the source in spring developments (per NRS 533.367). In other water developments, e.g. wells, water will be left at the source if physically possible and depending on water right considerations.

33

This comment pointed out an oversight during the preparation of the Draft RMP/EIS. Please refer to the Revisions and Errata section at the end of the appropriate chapter for the correction, revision, or addition. Chapters 1 and 2 have been reprinted completely.

34

Acreage of stream riparian vegetation is included within this table.

35

Recreation was not considered to be an issue in the RMP because such activities would not be significantly affected under any of the alternatives. Wildlife-associated recreation, including trapping, fishing, and non-consumptive uses, may be evaluated and quantified in economic terms, but only if estimates of the number of days spent in such activities are available. Unfortunately, no such data was available, and we were only able to develop estimates for hunting activities presently occurring on the public lands.

The time necessary to develop reasonable estimates for other recreation activities, including wildlife-associated recreation, was prohibitive, and represented an unnecessary expense to the public in view of the fact that recreation would not be significantly affected.

36

Please refer to Chapter 1 of this document for a more detailed explanation of issues and how they were selected. Upon further review, water quality was determined to be impacted and a discussion is included in this document in both Chapter 3 and Chapter 4.

37

A decline in ranch wealth, deriving from a loss of AUMs, would have a negative effect on loan (equity) and sale values of the affected ranches. The BLM does not and cannot guarantee ranchers any level of income, but impact estimates are necessary in order that management might be fully apprised of the range of potential effects of alternative proposals.

These estimations were utilized by management in the selection of the proposed action. This plan will be designed, with the participation of the public, to maximize the allocation of limited resources in such a way that the achievement of the public's goals, as expressed through the political process, can be enhanced while minimizing any hardship or adversity that might be suffered by individuals or interest groups.

RESPONSE
NUMBER

RESPONSE

38

The criteria established for determination of economic significance is presented on page 95 of the Draft RMP/EIS. The effects on wildlife-associated recreation expenditures are not expected to exceed these thresholds of significance.

39

Management zone boundaries are on the map titled "Grazing Allotments and Management Zones" at the end of Chapter 2 of the Draft RMP/EIS. A detailed explanation of zones is on pages 19-20 of the same document, which includes zone differences.

40

The general policy set by the Bureau of Land Management concerning wild horse populations is to use current numbers as an initial interim population level from which to begin monitoring; thus, management levels or numbers cannot be established at the present time. The several exceptions to this policy include numbers in an approved wild horse management plan (Monte Cristo) in interim numbers set in earlier gathering plans (Buck and Bald).

Management numbers for each herd use area will be established based on what monitoring indicates and addressed in herd management area plans. Based on multiple-use considerations, population levels in any individual herd use area could remain the same or be allowed to increase or the herd could be reduced. It is also policy that wild horses will continue to be managed in areas they inhabited in 1971.

41

Standard Operating Procedures No. 27 has been amended as follows:

27. No surface disturbance is to take place within the one-half mile buffer zone on either side of the Pony Express Route. The only exceptions allowed will be for the exploration of oil, gas, and geothermal and for the exploration and development of locatable mineral resources under the 1872 Mining Law. Specific stipulations for minimizing adverse visual and physical effects including rehabilitation will be required. These stipulations will be developed through the environmental review process for each action.

42

The wording has been changed as suggested. See the Revisions and Errata Section at the end of the appropriate chapter. Chapters 1 and 2 have been reprinted completely. Discussions of resources omitted from the Draft may be found in Chapters 3 and 4.

43

The Bureau of Land Management began with a macroscopic examination of geologic settings and inferred geologic processes, then consider more area-specific information about past mining, mining claim and lease location, and known mineral deposition. In certain instances, actual assay information is available. Once an area is recommended preliminarily suitable, the mineral survey begins. The Bureau of Mines closely examines existing mines and prospects. The USGS effort is more uniformly applied. One stream sediment sample is collected per square mile for geochemical studies; geologic mapping is performed for the entire area; and geophysical methods such as gravity surveys and aeromagnetic surveys may be performed. All of this data is then assembled and presented in a report that should represent a broad based consideration of an area's mineral potential. In all of these efforts, there is consideration of the economic conditions affecting possible development of potential of resources. There is also, as required, consideration of impacts to the national effort to develop and stockpile critical and strategic minerals.

**RESPONSE
NUMBER**

RESPONSE

44

Range improvements will be installed on a priority basis as stated in the selective management system (see Table 2-1 of the Egan Draft RMP/EIS) as funding will allow. Grazing systems will be implemented in the same manner.

45

The ranch budgets utilized in the analysis are adapted from budgets developed by Resource Concepts, Inc., 1981, "Potential Impacts of MX Deployment on Ranch Management and Ranch Economics," and from the, "Draft Grazing Environmental Impact Statement, Schell Resource Area, 1982," completed by the Bureau of Land Management, Ely District.

Each budget is designed to be representative of a "typical" or average ranch operation within the design classification. Actual operations are individual and unique, with operating characteristics which will differ from those of the "typical" ranch for which budgets were designed.

Purchase costs and selling prices were based on a 1978 through August, 1980 average, and were considered to be appropriate to the base year (1980) community economic data. While it is recognized that three-year-average prices may or may not be reasonable, depending on the state of the cattle cycle and the expected rate of inflation, such price and cost average are widely considered to be a fair estimate of an expected average over the next several years.

"Return to total investment" and "net ranch income," as utilized in the analysis, was defined in Appendix 10, page 205 of the draft RMP/EIS. Total net ranch income, for ranch operations in the Egan Resource Area, was estimated using the net ranch income figures for "typical" operations, multiplied by the estimated number of livestock brought to market by ranch operations within each "typical" classification.

46

The BLM's Wilderness Management Policy states, regarding wilderness areas, that:

When activities on adjacent lands are proposed, the specific impacts of [sic] those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements, as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities. (II. B.9.)

The same document also states the BLM's position on air quality in wilderness areas:

Under the Clean Air Act (as amended, 1977), BLM-administered lands were given Class II air quality classification, which allows moderate deterioration associated with moderate, well-controlled industrial and population growth. The BLM will manage designated wilderness areas as Class II unless they are reclassified by the State as a result of the procedures prescribed in the Clean Air Act (as amended, 1977).

According to the Clean Air Act, air quality reclassification is the prerogative of the States. The States must follow a process mandated by the Clean Air Act Amendments of 1977, involving a study of health, environmental, economic, social, and energy effects, a public hearing, and a report to the Environmental Protection Agency. (III.G.)

With these guidelines, wilderness designation would not endanger the White Pine Power Project in any way.

RESPONSE
NUMBER

RESPONSE

47

Monitoring efforts will help to identify the causes of any overgrazing and then management plans can be prepared to provide overall solutions to many of the problems. Far too often, short-term solutions to correct one problem may cause problems to other resources and may not fit in with an overall management plan. A better approach, the one selected for use within the resource area, is to use the monitoring program initially, to identify proper stocking levels and later to evaluate the effectiveness of management actions in achieving resource management objectives. Management plans will be prepared which will incorporate all resources, not just a few.

48

The proposed resource management plan recommends that all of the South Egan Range WSA is nonsuitable for wilderness designation.

49

The BLM Wilderness Management Policy states that hunting, fishing and trapping are compatible with wilderness and will be allowed, subject to applicable State and Federal laws and regulations.

50

The Mount Grafton WSA was studied in the Schell Wilderness Draft EIS, made public on April 8, 1983.

51

All roadless areas in the Egan Resource Area were inventoried for wilderness characteristics. The four wilderness study areas considered in the Egan Wilderness Technical Report were the areas determined to contain wilderness characteristics. Only these may now be considered for wilderness designation.

52

Upon closer examination it was determined that water quality may well be impacted in certain areas due to any number of management actions. Therefore, a discussion of water quality may be found in Chapter 3 and Chapter 4 of this document.

53

No access would be closed even if this area were designated wilderness, since existing roads would be left open to vehicle travel. Please refer to Response No. 48 for more detail.

54

The BLM's Wilderness Management Policy states that "maintenance of existing necessary rangeland improvements may be allowed to continue" (III.H.e.1.). Mitigation requirements will not entail "unreasonable costs."

55

The statement on page 97 of the draft document refers to new range improvements developed after designation. The same statement says that "cost increases will be within reason."

56

The problems of managing the area as wilderness are partly responsible for the nonsuitable recommendation for the area issued by the Ely District Office.

RESPONSE
NUMBER

RESPONSE

57

Page 106 in the Egan Technical Report does state there are no range improvements proposed. During the allotment categorization process, the Rock Canyon Allotment was designated as a "C" allotment. Funding of rangeland improvements will first be emphasized in "I" category allotments. As the funding is limited, "M" and "C" allotments will be scheduled for few, if any, projects. This is unrelated to the wilderness study area.

58

The Egan Resource Area receives only light ORV use. At this time it is not necessary to have strict limitations on ORV use. In the future if damage begins to occur, the BLM regulations allow for emergency limitations or closures to ORVs. These emergency limitations will be used in this Resource Area if damage occurs.

It was recently discovered that there indeed has been damage from ORVs to portions of the resource area. The northern portion of the Riordan's Well WSA and the central portion of the South Egan Range WSA will be designated as limited, which will allow vehicles to continue to use existing roads and trails. The remainder of the resource area will be designated open.

59

No single factor is responsible for the nonsuitable recommendation for the South Egan Range WSA. Rather, it is the combination of factors enumerated in the Technical Report that is the cause. Any one of these factors might successfully be mitigated, but the combination of them presents an insurmountable problem.

60

Vegetation conversion projects will be conducted primarily in areas producing greatly less than their potential, which support only a few species of wildlife and low livestock and wild horse use. The 19,000 acres involves only 0.4 percent of the public land in the Ely District so impacts on the few species which use this community will be limited. All plantings will be a "multiple species" seeding not the monotypic crested wheat used in past years. Both direct and indirect benefits for wildlife will result. By moving livestock use from higher mountain brush communities to seedings, mule deer winter ranges can be improved. By increasing plant diversity, use by both game and non-game species is expected to increase. The use of prescribed fire is not a management objective in itself, but a tool to be considered along with other available management options. As stated in Standard Operating Procedure 1 of this document, an environmental assessment would be conducted prior to any project development.

61

The area referred to as the 1971 wild horse areas were determined between 1971 and 1975 based on historical information where wild horses existed prior to the passage of Public Law 92-195 commonly known as the Wild Horse and Burro Act of 1971.

62

The initial determination of range condition for selective management criteria was based upon preliminary monitoring data and professional judgement and will be refined as monitoring data is obtained. It would be premature to consider any adjustments in livestock and/or wild horse numbers based upon our preliminary monitoring data and professional judgement.

RESPONSE
NUMBER

RESPONSE

63

Gathering wild horses with a helicopter has proven to be the most humane method to capture wild horses. As stated on page 99 of the Draft RMP/EIS death loss due to gathering operations in the Ely District has been less than 2 percent, and based on the information, it is projected that average death loss would not exceed that level.

64

Threshold values were developed by resource professionals familiar with local and industry conditions.

65

Wild horse gatherings are only one of the management actions used when managing wild horses, that is, specifically to control population levels when necessary. Another specific action is to select for unique characteristics if they exist within a herd use area, thus during a gathering operation these animals would not be removed.

A random removal would be used when no unique characteristics are identified. Thus, a gathering operation would remove a cross section of all the characteristics that exist within a herd use area. Since no wild horse herd is identical, each of these actions identified as well as many more, are analyzed on a case-by-case basis, before a decision is made.

66

The South Egan Range (NV-040-168) Wilderness Study Area is not graphically shown as it is not being recommended as suitable under the proposed resource management plan. The Butte Valley corridor north of T. 20 N. is being dropped from the proposed resource management plan. The Egan Resource Area has two designated corridors. A designated corridor is a corridor which already has an existing transmission or transportation facility which has room for expansion. A planned corridor is a utility corridor which has no existing transmission or transportation facilities in it and represents a preferred route. The designated corridors in the Egan Resource Area are the north-south corridor in Steptoe Valley which generally parallels U.S. Highway 93 and the Northern Nevada Railroad; and the east-west corridors north of U.S. Highway 50 from Steptoe Valley to Newark Valley.

67

The BLM has established a set of definite criteria for assigning classes of mineral potential to different areas. The purpose in first defining these criteria is to allow for judgements about potential that are as scientific and nonarbitrary as possible. However, a certain amount of subjectivity--and therefore room for disagreement--is unavoidable. The Ely District recognizes these differences, but respectfully declines to adjust its judgements solely on the basis of a difference of opinion. All specific comments regarding mineral resource values submitted to the Ely District over the past five years of inventory and study have been given consideration commensurate with their specificity and accuracy.

68

The geologic environments which host ores in nearby mines are not known to occur within the Riordan's Well WSA. The presence of mining claims and mineral leases do not, by themselves, signify the presence of energy or mineral potentials. A thorough mineral survey will be conducted for the WSA now that a portion of it has been recommended suitable for designation.

69

The proposed resource management plan recognizes the high mineral potential and historic mineral interest in the south end of the unit by recommending that this zone of potential is nonsuitable for designation.

RESPONSE
NUMBER

RESPONSE

70

The three year average use is used for analysis only and would not be required as a stocking rate. Any permittee may activate his nonuse at any time unless emergency conditions such as fire or flood were to preclude it. Determination of livestock grazing capacity will be based on monitoring data. See response No. 16 for determining the initial starting point. However, BLM will negotiate with individual permittees to establish initial stocking levels and this three-year average will be a figure which BLM will strive to have each permittee agree with.

71

Selective management categorization was done in accordance with the Director's final grazing management policy (Instruction Memorandum No. 82-292) and applies to all alternatives.

72

Professional judgement and limited existing studies was used to make the determination that overgrazing occurs in portions of grazing allotments in the Resource Area. The monitoring program will provide sound technical data as to the range condition in the resource area.

73

Deer depend heavily (key winter use) on already over utilized mountain brush communities. Livestock and wild horses depend more on grass and low shrub communities. It is expected that deer will be the first to decline in harsh winters when food is short. Livestock and wild horses will either decrease or change use areas but numbers will not be affected as soon as deer. Deer are more dependent on traditional winter range than livestock, which can be moved to different range or wild horses which move on their own.

74

Utilization studies have been established in many allotments in the Egan Resource Area. Each permittee has been given the opportunity to participate in the study process. Utilization maps have not been prepared for all allotments at this time. However, we agree this information is a valuable management tool to develop management systems, monitoring plans, etc. and should be used equally with other data and not be prepared on an annual basis.

75

This data is available at the District Office, therefore, no new appendix will be added. Please refer to Chapter 1 of this document for a detailed explanation of a resource management plan and what type of information that can be expected to be found in such a plan.

76

There were no range inventories conducted in the Egan Resource Area. Monitoring studies were started in 1979. The source of data used was indicated, whether it was professional judgement or preliminary monitoring data. No monitoring data was extrapolated between data allotments for riparian condition.

77

The condition evaluation method does account for natural erosion. BLM Manual 6612 is used to evaluate stream riparian condition. If little or no stream bank cover is noted ungulate damage is looked for. If no ungulate damage is detected, then natural erosion is the probable cause of the lack of vegetation.

RESPONSE
NUMBER

RESPONSE

78

Two methods of evaluating streams were utilized. BLM Manual 6612 (stream banks and shorelines) was used to evaluate stream bank riparian condition and was not extrapolated to evaluate the entire riparian area. BLM Manual 6671 was used to evaluate the stream as a fishery.

79

The criteria presented on page 200 was used to determine stream bank habitat condition in Appendix 7. Appendix 8 was mislabeled, the title should read "Fisheries Habitat" instead of "Riparian Condition."

80

The Egan Resource Area staff did not evaluate riparian habitats that were not associated with streams. BLM Manual 6612 was used to evaluate stream banks and shorelines. BLM Manual 6671 was used to evaluate stream habitat conditions.

81

The analysis of potential economic impacts which might occur in the affected area is necessarily time specific and must be based on data which identifies and describes the interrelationships which exist within the framework of a specific economic community at a point in time. At the time this analysis was conducted, the best available income and employment data for White Pine County described the economic community for the base year, 1980.

The typical ranch budgets utilized in the analysis reflect purchase costs and selling prices representative of a 1978 through August 1980 average, and were considered to be appropriate for application to the base year (1980) community economic data.

While it is recognized that three-year-average prices may or may not be reasonable, depending on the state of the cattle cycle and the expected rate of inflation, such price and cost averages are widely considered to be a fair estimate of an expected average over the next several years.

BLM grazing fees were not adjusted because they were appropriate to the base year economic data and were considered to be reflective of the relative production cost relationships at that time. Grazing fees for BLM administered lands are set by a legislative formula which requires annual adjustment with reference to the price of beef and cost of production. It is reasonable to assume, therefore, that the relative production cost relationships, with reference to the grazing fees, will be maintained.

82

This only refers to added costs of new range projects. Costs will be higher in wilderness study areas because of the emphasis placed on use of the least impairing construction methods and most environmentally compatible materials. It would have been more accurate to say that, if it was decided to construct a new project within a wilderness study area, the construction costs would be higher. However, the majority of projects in the Egan Resource Area are funded by BLM, not the rancher.

83

All vegetation conversions are considered to be non-structural improvements and, as such, BLM will continue to have full maintenance responsibility. All cost sharing of range projects is done with full agreement between BLM and the permittee.

RESPONSE
NUMBER

RESPONSE

84

Debt/equity ratios, per se, are not discussed in the draft RMP/EIS because such information is not available to BLM. The level of debt in proportion to capital asset value is a function of the resources available to each individual ranch operation and the private entrepreneurial philosophy and decisions of each operator. The degree to which debt financing is utilized is, therefore, highly variable for each operation and cannot be determined without access to sensitive information which many consider to be private and confidential.

However, gains or losses in loan or sale (capital asset) values, or ranch wealth, determined on the basis of the number of AUMs involved, was estimated and is discussed under each alternative. This analysis was included to display the overall effect on ranch operations in order that management might have information about the potential level of adversity or benefit that might occur under each alternative. It will be taken into consideration, along with all other potential effects, in the decision-making process.

85

Vegetative conversions will be done primarily in conjunction with the implementation of grazing systems on "I" allotments. Range improvements will not be used in place of grazing systems.

86

The rangeland monitoring program currently under use in the Egan Resource Area is adopted directly from the 1980 Nevada Range Studies Task Group (NRSTG) procedures, BLM 4410 studies manual, and various district supplements. The NRSTG is composed of specialists from BLM, USFS, Soil Conservation Service, the University of Nevada (Reno), and from private companies, only to name a few. These are some of the leading experts in the field of rangeland monitoring.

Monitoring data is used to determine vegetation potential, the existing situation, trend, and future livestock adjustments, if necessary, not to justify additional range improvements.

87

Allotment management plan (AMP) development and scheduling is, in part, a function of work load and funding. Although AMPs will still be completed, more efforts will be directed toward the preparation of overall management plans, which will include AMPs, habitat management plans and wild horse management plans. These will provide much better management actions for specific areas. AMPs will be prepared in conjunction with these management plans. In addition, grazing management systems can be implemented prior to or exclusive of the preparation of AMPs where appropriate.

88

Selective management is a Bureau-wide, comprehensive management policy, tied to the existing planning system, that would help BLM to prioritize efforts to implement the rangeland management program and assign management priorities among allotments or groups of allotments within a planning area. See Response No. 31 for more detail regarding selective management. There are 68, not 76, allotments placed into the M and C categories which means 28 allotments are in the I category. This may be somewhat misleading to say that only 28 of 96 allotments are in the I category, since in fact, these 28 allotments account for over 76 percent of the total acreage within the resource area. Placing more than 76 percent of the area in a high priority category defeats the basic purpose of categorization. Selective management is not inflexible, it is a dynamic process in that as resource conditions change, additional data becomes available, and/or funding and people permits, the original category an allotment was placed in may change. Please refer to Response No. 31 for a more detailed discussion of selective management criteria. Please refer to Response No. 119 for NDOW's involvement in allotment categorization.

RESPONSE
NUMBER

RESPONSE

89

Although there were no ACECs (Area of Critical Environmental Concern) proposed in the draft, a number of public comments were received suggesting possible candidates. However, we are not proposing any ACEC designations in this document, primarily because of the lack of accurate field information. This is not to say that areas cannot be designated in the future. We have tentatively identified two areas, a bristlecone pine area in the Egan Range and a swamp cedar area in White River Valley, which may be excellent candidates for ACEC designation and these will be closely examined this summer. Until more information is received and reviewed, designation may be untimely. The Resource Area does contain areas of critical wildlife habitat, cultural sites and scenic areas but there are other management options to protect these areas.

90

The draft RMP stated, "An undefined potential for off-road vehicle damage is not adequate justification for constraints on off-road vehicle use." This is a general guideline. If the BLM believes significant damage is imminent, corrective measures will be taken on a case-by-case basis. These may include emergency ORV limitations or closures. Currently, with the light ORV use in the Egan Resource Area, it would not be prudent to place restrictions on ORVs based on some undefined potential for abuse.

In the case of land disposal, these "potential" areas are not all slated to be sold. These are merely areas that could be suitable for disposal over the next 20 years. It is unlikely that all this land would be disposed of. Refer to Response No. 11.

The BLM did consider mineral potential in making its preliminary wilderness recommendations. Our policy requires this. Since wilderness designation is for perpetuity and will not be reviewed again in 20 years like the other resources in the RMP our recommendations should look as far into the future as possible. This includes addressing the area's mineral potential to the best of our ability. The BLM is not being inconsistent with the use of "potentials." Each resource has a different set of guidelines and management objectives that need to be followed.

91

Any group of range improvements installed must have a benefit-cost ratio of 1:1 unless there are over-riding environmental concerns or other written justification. Projects with less than 1:1 ratio were considered for analysis purposes only.

92

A great deal of effort was expended during the wilderness inventory to identify all roads and ways in the wilderness inventory units. Field reconnaissance included fixed wing and helicopter time and extensive ground work. Several formal comment periods were held to acquire from the public specific information about manmade imprints in the areas. Identified roads and noticeable ways will not be closed.

93

All existing access will remain open in the areas recommended suitable in the Egan Resource Area. The aged and infirm will not be denied the ability to travel anywhere that they are now able to visit.

Several commentators of advanced years have presented an opposing view, stating that they continue to enjoy large unroaded areas in spite of their senior status. Handicapped persons have often experienced the exhilaration of overcoming the challenge of the wild.

RESPONSE
NUMBER

RESPONSE

94

None of the valley areas by themselves qualified as WSAs during the wilderness inventory, however, most of the WSAs include roadless valley portions associated with the mountain ranges. The BLM recognizes the special and unique features of our valley areas. The mountain ranges in the Great Basin are by nature not as expansive as those found in other areas. Those identified as WSAs, however, were found to possess the wilderness criteria specified by Congress.

95

The Draft RMP/EIS is a document designed to help the manager make decisions by presenting a range of alternatives and analyzing their impacts. A draft document should not justify any alternative. It is up to the manager to choose the proposed action from the information presented in the draft.

96

To a certain degree, wilderness study and regular land use planning are incompatible exercises. The first is a one-time-only process that must examine impacts as far into the future as foreseeable. The second is a planning process intended to cover a finite time period (20 years in the case of the RMP) after which the plan can be rewritten to suit changing conditions. Incongruities arise because of these differences. Consideration of ORV use in wilderness involves long-term and very-long-term time frames, while generic ORV planning is concerned only with the 20-year lifetime of the RMP. Even so, there are immediate concerns with ORV use in wilderness study areas, and the final RMP has been written to reflect these concerns.

97

The definitions for mineral potential listed in the Wilderness Technical Report have been supplanted by the same "Classification and Confidence" scheme used in other BLM EISs. All analysis of mineral potential contained in the Technical Report is based on this latter scheme, and the wilderness preliminary final EIS will carry the appropriate definitions.

98

The significant adverse impact which would result to the minerals sector is not an economic one, but rather comes as a result of withdrawing from mineral entry an acreage amount that exceeds the established threshold. This threshold was established by the Ely District's Staff Geologist, who is cognizant of market conditions, the extent of ongoing and likely future exploration and mining, and resource potential in the WSAs. It is a subjective--but not arbitrary--measure of the effect that an action would have on the industry. While there are no identified reserves that would be withdrawn from entry, the withdrawal of lands with potential for minerals is a very definite impact. Denied the opportunity to explore for minerals, the industry is adversely affected to a greater or lesser degree depending upon the acreage withdrawn.

99

Recently acquired information from the U.S. Geologic Survey field testing supports the ratings first given to mineral potential in the Riordan's Well WSA. Further detailed study will be conducted through 1987.

100

The potential for well drilling in the western part of the Riordan's Well WSA is only of secondary importance to exclusion of that portion from the suitable recommendation. The primary reason is the potential of the area for mineral resources, based on favorable geology and proximity to existing mines.

RESPONSE
NUMBER

RESPONSE

101

Manageability concerns and low wilderness values combine with potential for oil and gas to make the east valley part of the Riordan's Well WSA nonsuitable for designation.

102

Recently acquired information suggests potential for a mineable subsurface deposit. This, in combination with the revised definitions of mineral potential, warrants a "high" potential rating.

103

The revised definitions of mineral potential allow for this rating. Recently acquired information from claim holders and the U.S. Geological Survey further substantiate the findings.

104

The jasperoid prospect mentioned has definitely been drilled by Amselco Minerals and they have dropped this area from further consideration. However, the Phase II GEM, geochemical sampling program found anomalously high levels of gold at approximately 30 PPM, and silver at or above 100 PPM. With these levels of mineral concentrations it is felt that further study of the area is warranted and no change in mineral classification needs to be made.

105

The Riordan's Well WSA consists of a diverse section of the Grant Range with numerous peaks separated by drainages which create a maze-like system. Heavy forest cover is provided by pinyon, juniper, and mountain mahogany. The screening provided by the topography and vegetation makes for outstanding opportunities for solitude. These opportunities, along with the size (57,002 acres) and the naturalness of the unit, give the area wilderness character as defined by the Wilderness Act of 1964. Special features of the area which supplement this wilderness character include bighorn sheep and ponderosa pines. Both are ecological features important for scientific study and for genetic diversity of the species.

The Riordan's Well WSA is in a highly natural condition. Most of the unit, including its large core of mountainous terrain, is untouched by manmade intrusions. Only along the periphery are there evidences of man's work. At the lower elevations of the suitable portion, the topography has permitted penetration by 4-wheel drive vehicles used by hunters and trappers. The result has been creation of 5 two-track roads and ways that are very primitive in nature and are well-screened by pinyon and juniper. These are cherry-stemmed out of the suitable area in accordance with BLM policy and practice, and thus remain available for use. Their presence does not affect the naturalness or solitude of the area.

The naturalness of the area is also unaffected by a spring development and pipeline at Lower Perish Spring on the east bench, and a fence in Heath Canyon. Their presence is very subservient on the landscape, they are peripheral in the unit, and they are cherry-stemmed from the suitable portion.

The overwhelming impression given by the suitable portion is of a wild, unsullied area where the forces of nature operate freely without interference from man.

Riordan's Well WSA offers outstanding opportunities for solitude due to its ruggedness, forested slopes and naturalness. Opportunities also exist for camping, hiking, cave exploration, horseback riding, hunting and nature study. The presence of bighorn sheep, mule deer, raptors and other wildlife enhance many of these opportunities.

There are no known mineral occurrences within its borders, and there has been no mining or prospecting. Based solely on geologic inference, potential was estimated to be low for accumulation of metallic mineral resources, with one exception in the west where contact metamorphism may have occurred in about 3,000 acres. No individual or company has been able to provide information to the contrary.

In January of 1984, the U.S. Geological Survey completed a geochemical study of the area and reported anomalously high values in certain parts of the WSA for silver, gold, lead, zinc, molybdenum, and copper. These studies are not conclusory, nor do the anomalous values guarantee a deposit of any of these metals. They only hint of deposition, and indicate a need for additional study, which is planned to begin in the summer of 1984.

Oil and gas potential for the area is estimated to be low. Again, this estimate is based on geologic inference. No company has been forthcoming with hard data supportive of any estimate of potential.

Conflicts with other resource values in the area are low. Livestock grazing occurs in some parts and would be unaffected by designation. Existing range facilities (Lower Perish Spring and the Heath Canyon Fence) are cherrystemmed from the area, and maintenance practices would be allowed to continue. There are no proposed range developments in the suitable portion. Much of the manageable woodland that occurs in the WSA is excluded from the suitable portion, so that conflicts with local resident needs for firewood, Christmas trees, and posts and poles would be minimal.

No other resource conflicts have been identified in the Riordan's Well WSA.

106

The Goshute Canyon WSA has outstanding opportunities for both recreation and solitude. Recreation opportunities include hunting, trapping, hiking, backpacking, spelunking, trout fishing, photography, nature study, and cross-country skiing. Among the environmental factors that contribute to these opportunities are the great abundance of wildlife including elk, mule deer, mountain lions, bobcats, sage grouse, and blue grouse; a very diverse landform and vegetative community that creates exceptional scenery; numerous springs and streams; and the highly natural condition of the setting. The recreation opportunities of the area have been enjoyed for many years by generations of local residents, and are now being discovered by Nevadans from the southern part of the state.

Many of the same features that contribute to recreation opportunities also make for outstanding opportunities for solitude. The diverse landform, with elevations above 10,000 feet and numerous large canyons walled by steep, rocky cliffs, provide excellent topographic screening. Vegetation screening is also excellent, with heavy stands of pinyon, juniper, aspen, and fir. The combination of these forms of screening in a well-configured unit creates a place where an individual may remove himself from all reminders of man's influence, and will likely not encounter other parties in the area except at trailheads.

These opportunities for recreation and solitude are distributed uniformly in the WSA. The mountains are rugged throughout, although the highest elevations occur in the south. Goshute Canyon in the northern half offers great recreation opportunities and a chance to penetrate deeply into the mountains, but so do two major canyons to the south, Currie Canyon and Log Canyon. Vegetation and wildlife are very similar in type and numbers along the entire length of the range.

Special features enhance the outstanding opportunities found within the unit. These special features include one of the Ely District's largest regenerating stands of bristlecone pine. The trees occur in the central high country mostly south of Goshute Creek and along the ridgelines. Examples of both young trees and those with the classic gnarled forms can be found. All age classes of bristlecone pine are represented. Other special features include the highly decorated Goshute Cave, archaeological values, diverse wildlife and spectacular scenery.

The quality of minerals information for the area varies greatly. In the southern tip of the area near where mining has occurred since the late 1800's, the information is good, and mineral potential appears to be high. Although most surface deposits have been mined out, there is a good probability that mineable subsurface deposits exist. This zone of potential is excluded from the preliminarily suitable portion.

The northern half of the WSA is rated as having low potential because of the lack of prospects, claims, or evidences of mineralization, and because of the lack of complex geology. It falls within the suitable portion.

Between the high potential in the south and the low potential in the north is an area rated as having moderate mineral potential. About half of this zone lies within the area recommended suitable for wilderness in the draft RMP. The estimation of moderate mineral potential is based primarily upon the proximity of the area to active mining in the south and the structural complexity of the geology. It is also based upon a jasperoid occurrence located along the western boundary. Because it is a target material for gold exploration, the jasperoid indicates some potential for mineralization, although a drilling program by a large mining concern rendered disappointing results, and the claims in this particular location have lapsed. The available information is therefore suggestive of some potential in the central part of the WSA, but is far from conclusory. To help substantiate what at this point are mere suspicions, the BLM, as required by the Federal Land Policy and Management Act, has arranged for the U.S. Geological Survey and Bureau of Mines to extensively survey the area. Some work was done during the summer of 1983, and the preliminary results tend to substantiate the original findings. They do not provide information sufficient to warrant boundary adjustments. The Geological Survey suggests that additional work be conducted, including more detailed stream sediment sampling and rock sampling and detailed geologic mapping. This work is scheduled to begin in the summer of 1984.

107

The usual width of utility corridors is 5 miles to allow for a variety of uses within the corridor and to allow the route of a right-of-way to vary in response to topographic or environmental problems. Livestock grazing and Desert Land Entry will be allowed in corridors.

108

As the Egan Wilderness Technical Report states on page 102, extreme circumstances make the removal from entry of geothermal potential in the WSA a very minimal impact. These include the distance from markets, lack of available infrastructure, and the low confidence in the assignment of potential. Metallic mineral potential was found by the USGS, during the 1983 Phase II GEM Inventory, to be low. These mineral and energy potentials are judged in this case to be preceded by the extraordinary wilderness values of the Park Range. Closer examination of the energy and mineral potential will, of course, follow.

**RESPONSE
NUMBER**

RESPONSE

109

The categorization procedure described in the draft RMP/EIS is consistent with procedures used throughout Nevada. Production potential has played an important part in categorization, as has current production. Livestock operators had the opportunity to review allotment categorization at meetings held throughout the area in December 1983. Please refer to response 88 for more details. Some changes may occur as new data becomes available.

110

A study of several archaeological sites associated with the Park Range meadows is currently underway. A portion of the Park Range is being considered for designation as a Research Natural Area, which could provide as much protection as wilderness.

111

In the case of any development which may affect archaeological sites in the South Egan Range, impacts will be analyzed and mitigated as outlined under the Standard Operating Procedures.

112

The affected environment chapter has been expanded in this final document to include more cultural information. Reference has been made to the existing Class I and II Inventory reports.

113

Impacts resulting from the construction of the White Pine Power Project (WPPP) are addressed in the EIS prepared specifically for the WPPP. All the potential impacts listed in your letter should be addressed in the final EIS which will be released in the spring of this year.

114

The White Pine Power Project, as yet, has not formally applied for the land to be used as its power plant site. It is possible, though unlikely, the site could be located in Spring Valley which is not in the Egan Resource Area. Impacts caused by the disposal of the land needed for the White Pine Power Project will be handled in the WPPP EIS.

115

The grass seeding (dryland) land use class was that land which had the soil and moisture to allow dryland farming and were no longer important for Federal ownership. The difference between alternatives is due to the fact that Alternative C eliminated those dryland areas that were in key wild horse habitat.

116

The definition for high mineral potential used by the Great Basin GEM Joint Venture, an independent group contracted by the BLM to rate potentials in Nevada WSAs, reads as follows:

The geologic environment, the inferred geologic processes, the reported mineral occurrences, and the known mines or deposits indicate high favorability for accumulation of mineral resources.

This definition allows for a high rating in previously unmined areas. The findings of the GEM Joint Venture were accepted by the BLM largely without change, so that the above definition of high potential supercedes the one listed in the Egan Wilderness Technical Report. All areas found by the GEM Joint Venture to have high mineral potential are shown on maps and reported in the text of this document.

117

Although nonimpairing geochemical and geophysical studies can be conducted to assess mineral potentials, in order to determine that an area has no mineral resource potential, its naturalness and other values would have to be impacted by extensive exploration. To do so in the search for suitable wilderness areas could paradoxically destroy the resource that is being considered for protection. This, of course, would thwart the original interest of Congress when it established the National Wilderness Preservation System.

Furthermore, the Congress did not indicate any intent to prohibit designation of areas with mineral potential. Instead, it mandated an extensive mineral survey for all areas prior to designation so that a reasoned and knowledgeable balancing of values could be conducted. Where it appears that wilderness values outweigh mineral (and other competing resources) values based upon the best available information, then wilderness designation is indicated. No single resource will always have priority in these management recommendations.

118

The Bureau's policy is to consider the merit of each proposed land disposal on a case-by-case basis and not to give any one method of disposal (such as land exchanges) priority over any other, unless it would be in the public's interest.

The Federal Land Policy and Management Act (FLPMA) declared "It is the policy of the United States that - (1) the public lands be retained in Federal ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular parcel will serve the national interest."

At present there is no authority except for special acts of Congress, (for specific areas such as Lake Tahoe) to use money from the sale of public lands to purchase private lands.

119

Current policy for establishing wild horse numbers is based on the following:

- a. Where range studies or other quantifiable data have identified a need to begin monitoring studies with a specific number of wild horses or burros and those studies demonstrate that only by reducing the number of wild horses or burros will a specific resource problem be corrected, the specified number of animals may be used.
- b. Where the CRMP has recommended an alternative number of wild horses or burros, as documented in the minutes of a CRMP meeting and concurred with by the Bureau, the alternative number may be used.
- c. Where formal signed agreements between affected interests have been obtained which specify a different number of wild horses or burros from current levels, the specified number may be used.
- d. Where previously developed interim capture and management plans and associated EARs presently exist and where actual implementation has started but not been completed, the interim number of wild horses or burros specified in the plan may be used.
- e. Where previously developed interim capture/management plans exist, nothing has been done toward implementation and there is reason to believe that support for the plan by affected parties no longer exists, current wild horse or burro numbers will be used unless negotiations can produce a documented acknowledgment supporting the number of animals specified in the plans.

**RESPONSE
NUMBER**

RESPONSE

f. Where previously developed interim capture plans exist, nothing has been done toward implementation and there is reason to believe that support for the plan by affected parties still exists, the number of wild horses/burros specified in the plan may be used.

g. Where negotiations are in progress (either CRMP or other processes of negotiation) and there is an opportunity to arrive at an adjusted number of wild horses/burros, the land use decision may acknowledge a range of numbers being considered in the negotiations.

h. If none of the above conditions are applicable in establishing a starting point for monitoring, the current wild horse and burro numbers will be used.

Herd management area plans will be developed by BLM after the multiple-use decisions have been made. These plans include specific information on habitat improvements, method and timing for removal of excess animals, monitoring of the herds and habitat and population control measures. Population levels in each herd use area will be based on what monitoring indicates, addressed in the herd management area plan and be approved by all concerned agencies, Permittees and special interest groups. Thus, population levels or management numbers in each herd use area could remain the same, be allowed to increase or the herd could be reduced.

The interim population for the Buck and Bald Herd use area will be 700 animals. This interim management level is based on the number that was established in 1981 via the interim management plan.

Wild horses will be managed in the 1971 areas and controlled through gathering operations.

120

Wildlife and potential conflicts were considered throughout the categorization process. The BLM has had numerous meetings during the past two years regarding the RMP, ranging from scoping (determining issues) to reviewing alternatives. Nevada Department of Wildlife has not had representatives at any of these meetings. More specifically, BLM scheduled three meetings in December 1983 to discuss allotment categorization, all of which NDOW did not attend. BLM then offered to have a special meeting for Nevada Department of Wildlife (NDOW) regarding allotment categorization, but NDOW was unable to attend. We heartily agree that the Department of Wildlife should be involved throughout the process and would welcome any suggestions to get that involvement.

121

The development of the criteria incorporated into the draft plan were preliminary steps used to guide the development of the resource management plan. Therefore, at the time that these criteria were developed it was unknown how the management actions proposed in the Preferred Alternative would be made. Criteria were eventually developed, but not incorporated into the actual document for each alternative during the alternative formulation phase. The stated objective found at the beginning of each alternative narrative is a summary of the criteria used to develop that alternative. The decision criteria for the proposed resource management plan are listed in Chapter 1 of this document.

122

Professional judgement of Resource Area specialists and available monitoring data was used to determine the amounts of forage production. No decisions were based upon this data. The data displayed here was used to help determine and differentiate between management zones. Incomplete data is presently available from the numerous monitoring studies placed within the Buck, Bald, and Maverick areas.

RESPONSE
NUMBER

RESPONSE

123

The 45 percent use on shrubs is total utilization by all animal species and comes from the 1981 Nevada Range Studies task group guidelines for range monitoring. Use by animal species will be determined by monitoring procedures and adjustments made to correct over use problems.

124

BLM Manual 6671 was used to evaluate Goshute Creek and the creek was determined to be in poor to fair habitat condition for fish. BLM Manual 6612 was used to evaluate stream bank riparian condition of Goshute Creek. The riparian vegetation, other than stream riparian, is in good condition.

125

Seeding locations will be determined when AMP/HMPs are developed. In some areas/seasons elk and mule deer use seeding heavily, so seedings in key big game habitats can't be automatically excluded. Big game animals can and will increase through the implementation of properly planned and constructed range improvement projects.

126

The Western States Sage Grouse Guidelines will be followed in areas with sage grouse use.

127

The criteria for designation of ACECs is outlined in the June 1980 BLM guidelines. One or more wildlife species or populations of unique value can qualify. ACEC designation in Nevada has been limited to small areas for which there are no other better means of protection. Management of key wildlife habitat can be dealt with through habitat management plans or other management actions. ACEC designation is not necessary.

128

As stated in 43 CFR 4110.1: "To qualify for grazing use on the public land an applicant must be engaged in the livestock business, and must own or control land or water base property."

129

All areas are candidates for wilderness designation, whether they have high, moderate, low, or no mineral potential.

130

The patented land was not included within the WSA. It is adjacent to the north boundary of the WSA but is located outside of the WSA.

131

The 14 acres per mile impact of transmission corridor construction is limited to the construction of corridors through pinyon-juniper stands as stated on page 93 of the draft plan. It is realized that this figure would be lower when construction takes place over areas that are not as densely vegetated and have easier access.

RESPONSE
NUMBER

RESPONSE

132

In several cases, primitive roads and ways have provided partial reasons for nonsuitable recommendations. Oftentimes this is so not only because of the unnatural appearance of the travel routes, which is in some cases admittedly slight; but also because of the impracticality of ever closing such routes to vehicles, because of the impacts such vehicles would have on a wilderness area, and because of the cumulative effect of such routes when several occur in a relatively small area. All such instances were given careful consideration by personnel who had good on-the-ground knowledge of the areas.

133

The efforts of NORA (and many other groups and individuals) to provide relevant information about the Egan WSAs are gratefully acknowledged by the Ely District. Comments received from NORA have been considered - and are on file with - all other public comments received during the inventory and study of lands for wilderness designation.

134

The quote from page 105 in the Draft Resource Management Plan is not a generic assumption, it is a conclusion about the specific proposals contained in the Preferred Alternative: there would be "minimal overall impacts" as a result of designating 106,598 acres as wilderness. The impacts of the alternative on future mineral production and on other components of the local economy have been given due consideration in the Egan Wilderness Technical Report, and will continue to receive treatment in the mineral surveys conducted for the suitable areas.

135

The selected statement referred to here comes from the "Alternatives" Chapter of the Technical Report, not the "Environmental Consequences" chapter. The statement describes the guidance used to formulate one alternative for one area. The analysis of impacts which follows concludes, indeed, that wilderness designation for the Park Range (46,831 acres) would not significantly affect the minerals industry. This conclusion applies only to this area in this alternative. It is not a general assumption about wilderness designation's impacts on the industry.

136

The best available information indicates low to moderate favorability for mineral accumulation in the Riordan's Well WSA.

137

This quote, taken out of context, refers to the formulation of alternatives, not the assessment of impacts. It refers to one part of the Goshute Canyon WSA, not the entire area. The same paragraph states that "the southern third is recommended unsuitable because of a combination of high and moderate favorability." The BLM is fully aware of the importance of mining to the local economy.

138

The GEM report for the Goshute Canyon WSA lists high mineral potential in the south end of the area, and moderate potential for much of the remainder. This information was incorporated in the Wilderness Technical Report and the Resource Management Plan, and is directly responsible for the diminished configuration of the preliminarily suitable part of the WSA.

139

The Nevada Cattleman's Association, in a letter dated 1983 supported wilderness designation in four (unspecified) roadless areas in the Egan Resource Area. This letter is on file at the Ely District Office.

RESPONSE
NUMBER

RESPONSE

140

Wilderness is not an exclusive use of the land. Livestock grazing, for example, will be allowed to continue at present levels. The benefits of designation may also be wide-ranging, affecting resources such as wildlife, watershed, and social values of long-standing.

141

The BLM believes that the wilderness recommendations for the Egan Resource Area are a reasonable response to the Congressional mandate contained in the Wilderness Act and the Federal Land Policy and Management Act. By recommending that 2.8 percent of the Resource Area be set aside as wilderness, the BLM is contributing to the establishment of "an enduring resource of wilderness" for "the permanent good of the whole people," not just for a few "Nevada and out-of-state hikers." These recommendations come only after extensive consideration of their effects on other resources and uses, and are subject to modification after still further study.

142

There is a place and a need for parks like Yosemite, and there is a place and a need for designated wilderness areas. The United States Congress has recognized the need for each in a long history of enabling legislation.

143

It is predicted that wilderness areas in the Egan Resource Area would receive only light recreation use for several years to come. Recreation use, however, is only one of six public purposes for which Congress established the National Wilderness Preservation System. The others are scenic, scientific, educational, conservation, and historical use. Also, the Congress established the system for the American people of present and future generations. Use in these areas may not be high during this or even the next generation, but at some time in the future may become substantial. Because of the nature of the resource, however, allocations must be made now.

144

The BLM's Wilderness Management Plan states that:

Recreational or hobby collection of mineral specimens (rockhounding) will be allowed in wilderness. Such use will be limited to hand methods or detection equipment that does not cause surface disturbance, such as a metal detector or Geiger counter. (III.A.5.)

145

The statement from the Technical Report refers to the fact that some nations subsidize their copper industries with wealth drawn from other domestic industries, then export the copper at very competitive prices so as to acquire foreign exchange.

146

The studies quoted determining condition of riparian areas are preliminary studies. Detailed monitoring will enable us to determine the extent and cause of over-grazing of riparian areas. When these monitoring studies are underway, management plans can be prepared which, among other things, will improve the condition of riparian areas. These plans may incorporate grazing systems, adjustments of livestock and/or wild horse numbers, and the construction of range improvements. Any construction of fences within an allotment may hamper future plans and may cause other resource conflicts, e.g., disrupting wild horse movement.

**RESPONSE
NUMBER**

RESPONSE

147

In case of the Goshute Canyon WSA, the body of information concerning mineral potential is extensive and well-researched. Where such information is mainly cursory for other areas, it is believed adequate in this case to make major boundary adjustments.

148

While mineral resource potentials played some small role in the configuration of the Riordan's Well suitable area, a more important factor was the unmanageable character of certain portions, including the north end and the east bench.

149

The mention on page 85 of the Technical Report refers to actual ore bodies, not potential. The extent of ore bodies is not known, but potential for substantial deposition is believed high.

150

While large companies may be uninterested in the area, smaller scale operations may profitably extract minerals from the area. Such operations can be very important to the local economy since small and medium-sized operations are more likely to have substantial involvement from local firms than are large operations.

151

The conflict with the White Pine Power Project involves the routing of a coal transportation railroad to the power plant from a point south of the WSA.

APPENDICES

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 1
COMPARATIVE REVIEW OF MANAGEMENT ACTIONS OF THE SIX ALTERNATIVES

Resource	Preferred	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Livestock Use	123,461 AUMs	123,461 AUMs	92,308 AUMs	123,461 AUMs	236,316 AUMs	0 AUMs
Range Improvement	Implement those projects which would emphasise the greatest return on investment in relationship to resource needs.	No planned or scheduled projects	Implement those projects which would have a substantial benefit, in addition to livestock, to wildlife and wild horses.	Implement those projects which would provide the greatest return on investment.	Implement those projects which would provide the greatest benefit to livestock.	Implement projects which would only benefit wildlife and wild horses.
Rangeland Monitoring	Continue existing rangeland monitoring studies and establish new studies as needed. Monitoring studies would be used to determine if adjustments in livestock and wild horse numbers were necessary.	Rangeland monitoring of grazing use for proper utilization and trend would continue. For analysis purposes, it is assumed that no adjustments would be made on the basis of monitoring data.	Rangeland monitoring would continue as in the past, but would be modified by incorporating new studies as necessary. Monitoring studies would be used to determine if adjustments in livestock and wild horse numbers were necessary.	Continue existing rangeland monitoring studies and establish new studies as needed. Total utilization will not exceed proper utilization of key management species.	Continue existing rangeland monitoring studies and establish new studies as needed. After five years of monitoring, if excess forage beyond sustained yield is available, it would be given to livestock by allowing for an increase in numbers of livestock. Total utilization will not exceed proper utilization of key management species.	Rangeland monitoring would continue, but would be modified by incorporating new studies as necessary. Monitoring studies would be used to determine if adjustments in wild horse numbers were necessary.

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 1 (con't.)
COMPARATIVE REVIEW OF MANAGEMENT ACTIONS OF THE SIX ALTERNATIVES

Resource	Preferred	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Wild Horse Levels	1,451 Horses	1,936 Horses	2,235 Horses	1,936 Horses	347 Horses	2,205 Horses
Fire Management	A resource area-wide fire management plan would be developed which allows a broad spectrum of uses. Fire would be used as a tool when it is the most effective and efficient method for improving habitat and increasing available forage.	All wildfires would continue to be suppressed.	Wildfires would be suppressed in all riparian areas, key wildlife habitat, or when life or property are endangered.	A resource area-wide fire management plan would be developed which allows a broad spectrum of uses, depending on the individual situation. Fire would be used as a tool when it is the most effective and efficient way of accomplishing a task.	A resource area-wide fire management plan would be developed, which would allow fires to burn in pinyon-juniper and sagebrush ecotypes if conditions for prescription are met, where there is no threat to private or historic structures or life, and when such burning is in accordance with the woodland management policy. Generally areas which could support grass seedings would be seeded with crested wheatgrass after burns.	Wildfires would be suppressed in all riparian areas, key wildlife habitat or when life or property are endangered.

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 1 (con't.)

COMPARATIVE REVIEW OF MANAGEMENT ACTIONS OF THE SIX ALTERNATIVES

Resource	Preferred	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Vegetation	Manage for that vegetation which will provide sufficient forage for the proposed levels of wild horses, wildlife, and livestock.	Manage vegetation to provide available forage for existing levels of animals.	Manage vegetation which will mostly benefit wild horses and wildlife.	Same as the Preferred Alternative.	Manage for that vegetation which will most benefit livestock.	Same as Alternative B
Land Disposals	79,888	On a case-by-case basis.	39,555 acres	79,888 acres	113,479 acres	39,555 acres
Utility Corridors	Two utility and transportation corridors are existing, one running north and south, and one running east and west. Three others would be planned, two running north and south, and one running east and west.	Applications would be processed on a case-by-case basis.	Two utility and transportation corridors are existing, one running north and south along an existing 69 KV utility line in Steptoe Valley and the other running east and west along an existing 230 KV utility line.	Two utility and transportation corridors are existing, one running north and south, and one running east and west. Three others would be planned, two running north and south, and one running east and west.	Utility and transportation corridors, both existing and planned, would be in conjunction with the Western Regional Corridor Study and where utility companies have indicated an interest or need.	Two utility and transportation corridors are existing, one running north and south along an existing 69 KV utility line in Steptoe Valley and the other running east and west along an existing 230 KV utility line.

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 1 (con't.)

COMPARATIVE REVIEW OF MANAGEMENT ACTIONS OF THE SIX ALTERNATIVES

Resource	Preferred	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
Wilderness Study Areas	Goshute Canyon (NV-040-015) 22,225 suitable acres (13,369 nonsuitable acres).	None of the wilderness study areas would be recommended as suitable for wilderness designation.	Goshute Canyon (NV-040-015) 35,594 suitable acres.	Goshute Canyon (NV-040-015) 26,436 suitable acres (9,158 nonsuitable acres).	Goshute Canyon (NV-040-015) 0 suitable acres (35,594 nonsuitable acres).	Goshute Canyon (NV-040-015) 35,594 suitable acres.
	Park Range (NV-040-154) 46,831 suitable acres (437 nonsuitable acres)		Park Range (NV-040-154) 47,268 suitable acres.	Park Range (NV-040-154) 38,573 suitable acres (8,695 nonsuitable acres).	Park Range (NV-040-154) 34,042 suitable acres (13,226 nonsuitable acres).	Park Range (NV-040-154) 47,268 suitable acres.
	Riordan's Well (NV-040-166) 37,542 suitable acres (19,460 nonsuitable acres).		Riordan's Well (NV-040-166) 57,002 suitable acres.	Riordan's Well (NV-040-166) 42,493 suitable acres (11,211 nonsuitable acres).	Riordan's Well (NV-040-166) 30,363 suitable acres (26,639 nonsuitable acres).	Riordan's Well (NV-040-166) 57,002 suitable acres.
	South Egan Range (NV-040-168) 0 suitable acres (96,916 nonsuitable acres).		South Egan Range (NV-040-168) 96,996 suitable acres.	South Egan Range (NV-040-168) 57,660 suitable acres (39,256 nonsuitable acres).	South Egan Range (NV-040-168) 16,560 suitable acres (80,356 nonsuitable acres).	South Egan Range (NV-040-168) 96,996 suitable acres.

232

* Wilderness recommendations made in the Proposed Resource Management Plan are preliminary and subject to change during administrative review. A separate final legislative EIS will be prepared for the wilderness study recommendations.

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 1 Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Railroad Pass	2,311 C 691 S	313 C 630 S	313 C 630 S	313 C 630 S	313 C 630 S	2,311 C 691 S	0 0		
W P Seeding	258 C	250 C	250 C	250 C	250 C	258 C	0		
Cold Creek	9,129 C	5,406 C	5,406 C	5,406 C	5,406 C	9,129 C	0		
Fort Ruby	90 C	90 C	90 C	90 C	90 C	90 C	0		
Warm Springs	23,995 C	10,261 C	10,261 C	86 C	10,261 C	23,995 C	0	Spring development	1000 ac. burn, 1000 ac. burn/seed
233 Strawberry	3,256 C	1,500 C	1,500 C	1,374 C	1,500 C	3,256 C	0		
Newark	12,404 C	6,890 C	6,890 C	4,443 C	6,890 C	12,404 C	0		
North Pancake	648 S	381 S	381 S	356 S	381 S	648 S	0		
Maverick Springs	1,500 C	1,375 C	1,375 C	1,375 C	1,375 C	1,500 C	0		
Warm Springs Trail	2,632 S	461 S	461 S	461 S	461 S	2,632 S	0		
Silverado	338 C	181 C	181 C	143 C	181 C	338 C	0		
	53,308 C 3,971 S	26,266 C 1,472 S	26,266 C 1,472 S	13,480 C 1,447 S	26,266 C 1,472 S	53,281 C 3,971 S	0 C 0 S	Other Improvements In	This Zone: 1,500 acre burn/seed 1/2 mile pipeline 2 wells guzzler

C - Cattle
 S - Sheep

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (cont.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 2 Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Sabala Springs	2,466 S	790 S	790 S	790 S	790 S	2,466 S	0		
Six Mile	1,354 S	860 S	860 S	778 S	860 S	1,354 S	0		
Monte Cristo	1,129 C	372 C	372 C	372 C	372 C	1,129 C	0		
South Pancake	1,154 S	492 S	492 S	467 S	492 S	1,154 S	0		
Black Point	609 C	510 C	510 C	510 C	510 C	609 C	0		
Ruby Valley	850 C	580 C	580 C	580 C	580 C	850 C	0		
Horse Haven	1,056 C	671 C	671 C	671 C	671 C	1,056 C	0		Pipeline
Duckwater	30,086 CS	16,274 CS	16,247 CS	15,835 CS	16,247 CS	30,086 CS	0		1,200 ac. burn/seed, 2 guzzlers
Moorman Ranch	10,099 C	5,404 C	5,404 C	5,184 C	5,404 C	10,099 C	0		
Gold Canyon	1,068 S	173 S	173 S	0	173 S	1,068 S	0		
Medicine Butte	15,174 CS	9,673 CS	9,673 CS	600 CS	9,673 CS	15,174 CS	0		
North Butte	698 C	463 C	463 C	463 C	463 C	698 C	0		
Thirty Mile Spring	8,405 CS	5,047 CS	5,047 CS	4,217 CS	5,047 CS	8,405 CS	0		
South Butte	850 C	358 C	358 C	358 C	358 C	850 C	0		
South Butte Seeding	342 C	228 C	228 C	228 C	228 C	342 C	0		
Butte Seeding	350 C	217 C	217 C	217 C	217 C	350 C	0		
Dry Mountain	966 S	836 S	836 S	826 S	836 S	966 S	0		
	69,648 C 5,789 S	39,797 CS 3,151 S	39,797 CS 3,151 S	29,235 CS 2,861 S	39,797 CS 3,151 S	69,648 CS 5,789 S	0 0	Other Improvements In	This Zone:
								4 wells 5 springs 3,500 acre burn/seed	

234

C - Cattle
S - Sheep

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (con't.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 3 Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Willow Springs	5,856 C	1,757 C	1,757 C	1,276 C	1,757 C	5,856 C	0		
Indian Creek	71 C	70 C	70 C	0	70 C	71 C	0		
Goshute Basin	543 S	440 S	440 S	0	440 S	534 S	0		
Becky Creek	671 S	224 S	224 S	178 S	224 S	671 S	0		
North Steptoe	700 S	418 S	418 S	388 S	418 S	700 S	0		
Lovell Peak	105 S	30 S	30 S	6 S	30 S	105 S	0		
Schellbourne	799 CS	125 CS	125 CS	101 CS	125 CS	799 CS	0		
Whiteman Creek	384 S	0	0	0	0	384 S	0		
Bennett Creek	37 C	23 C	23 C	15 C	23 C	37 C	0		
Big Indian Creek	99 C	16 C	16 C	11 C	16 C	99 C	0		
Middle Steptoe	173 C	175 C	175 C	167 C	175 C	173 C	0		
Deep Creek Flat	1,359 C	499 C	499 C	489 C	499 C	1,359 C	0		
Steptoe	2,779 C	1,820 C	1,820 C	1,642 C	1,820 C	2,779 C	0		
Husser Mountain	1,416 C	1,287 C	1,287 C	1,134 C	1,287 C	1,416 C	0		
Second Creek	358 S	120 S	120 S	117 S	120 S	358 S	0		
Gallagher Gap	169 C	142 C	142 C	139 C	142 C	169 C	0		

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (con't.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 3 (con't.) Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Duck Creek Basin	436 C	438 C	438 C	186 C	438 C	436 C	0		
Schoolhouse Spring	191 C	64 C	64 C	24 C	64 C	191 C	0		
Goat Ranch	213 C	208 C	208 C	83 C	208 C	213 C	0		
Georgetown Ranch	1,719 C	283 C	283 C	283 C	283 C	1,719 C	0		
Cherry Creek	7,146 CS	3,039 CS	3,039 CS	2,313 CS	3,039 CS	7,146 CS	0		
Duck Creek	498 S	208 S	208 S	0	208 S	498 S	0		
Gilford Meadows	420 C	419 C	419 C	58 C	419 C	420 C	0		
Gleason Creek	2,567 S	0	0	0	0	2,567 S	0		
West Schell Bench	1,460 S	1,172 S	1,172 S	892 S	1,172 S	1,460 S	0		
McDermitt	630 C	630 C	630 C	630 C	630 C	630 C	0		
Sawmill Bench	114 C	114 C	114 C	0	114 C	114 C	0		
Rock Canyon	432 C	432 C	432 C	432 C	432 C	432 C	0		
Six Mile Ranch	162 C	162 C	162 C	125 C	162 C	162 C	0		
Dee Gee Spring	200 C	200 C	200 C	193 C	200 C	200 C	0		
Brown Knoll	135 C	136 C	136 C	0	136 C	135 C	0		
Tamberlaine	2,002 C	2,000 C	2,000 C	1,408 C	2,000 C	2,002 C	0		

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (cont.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 3 (cont.) Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
White Rock	7,473 C	6,097 C	6,097 C	5,760 C	6,097 C	7,473 C	0		
Cattle Camp/Cave Valley	6,878 C	5,934 C	5,934 C	5,087 C	5,934 C	6,878 C	0		
Cave Valley Ranch	2,403 C	1,181 C	1,181 C	355 C	1,181 C	2,403 C	0		
Sheep Pass	1,150 C	1,224 C	1,224 C	415 C	1,224 C	1,150 C	0		
Shingle Pass	2,802 C	1,867 C	1,867 C	568 C	1,867 C	2,802 C	0		
Haggerty Wash	194 C	195 C	195 C	131 C	195 C	194 C	0		
Cave Valley Seeding	200 C	217 C	217 C	153 C	217 C	200 C	0		
Cold Spring	1,265 C	1,265 C	1,265 C	827 C	1,265 C	1,265 C	0		
Lake Area	2,074 CS	1,732 CS	1,732 CS	1,334 CS	1,732 CS	2,074 CS	0		
Little White Rock	485 CS	464 CS	464 CS	295 CS	464 CS	485 CS	0		
Chimney Rock	684 CS	680 CS	680 CS	0	680 CS	684 CS	0		
	<u>62,516 SC</u> 7,286	<u>34,895 SC</u> 2,612	<u>34,895 SC</u> 2,612	<u>25,674 SC</u> 1,581	<u>34,895 SC</u> 2,612	<u>52,129</u> 7,277	<u>0</u> 0	Other Improvements In	This Zone:
								13,200 acre burn/seed	
								2 wells reservoir	
								4 mile pipeline	

C - Cattle
 S - Sheep

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (cont.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 4 Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Copper Flat	1,190 S	941 S	941 S	648 S	941 S	1,190 S	0		
Jake's Unit Trail	832 S	334 S	334 S	334 S	334 S	832 S	0		
Badger Spring	1,412 S	473 S	473 S	472 S	473 S	1,412 S	0		
Giroux Wash	3,107 CS	493 CS	493 CS	173 CS	493 CS	3,107 CS	0		
Dark Peak	1,065 CS	581 CS	581 CS	449 CS	581 CS	1,065 CS	0		
	<u>4,172 CS</u> 3,434	<u>1,074 CS</u> 1,748	<u>1,074 CS</u> 1,748	<u>622 CS</u> 1,454	<u>1,074 CS</u> 1,748	<u>4,172 CS</u> 3,434	<u>0</u> 0	Other Improvements In	This Zone:
								1 well	
								2,000 acre burn/seed	
								3 mile pipeline	

C - Cattle
 S - Sheep

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (con't.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 5 Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Tom Plain	6,039 C	6,039 C	6,039 C	5,963 C	6,039 C	6,039 C	0		
Indian Jake	2,948 C	1,495 C	1,495 C	1,449 C	1,495 C	2,948 C	0		
McQueen Flat	496 C	310 C	310 C	310 C	310 C	496 C	0		
Preston	166 C	132 C	132 C	132 C	132 C	166 C	0		
Douglas Point	368 C	207 C	207 C	168 C	207 C	368 C	0		
Douglas Canyon	175 C	172 C	172 C	150 C	172 C	175 C	0		
Big Six Well	140 C	110 C	110 C	100 C	110 C	140 C	0		
North Cove	732 C	732 C	732 C	695 C	732 C	732 C	0		
Cove	1,040 C	1,038 C	1,038 C	1,012 C	1,038 C	1,040 C	0		
Sorenson Well	193 C	193 C	193 C	193 C	193 C	193 C	0		
Wells Station	312 C	217 C	217 C	202 C	217 C	312 C	0		
Preston Lund Trail	1,568 S	728 S	728 S	728 S	728 S	1,568 S	0		
Willow Springs Seeding	124 C	102 C	102 C	102 C	102 C	124 C	0		
Willow Springs Addition	251 C	193 C	193 C	193 C	193 C	251 C	0		
Maybe Seeding	300 C	299 C	299 C	299 C	299 C	300 C	0		

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 2 (con't.)
 INITIAL LIVESTOCK AUM LEVELS BY ALTERNATIVES
 AND PRIORITY RANGE IMPROVEMENTS

ZONE 5 (con't.) Allotment	Preference	Preferred	A	B	C	D	E	RANGE IMPROVEMENTS	
								Short Term	Long Term
Sheep Trail Seeding	200 C	196 C	196 C	196 C	196 C	200 C	0		
East Wells	122 C	115 C	115 C	109 C	115 C	122 C	0		
Swamp Cedar	192 C	193 C	193 C	193 C	193 C	192 C	0		
	<u>13,798 C</u> 1,568	<u>11,743 C</u> 728	<u>11,743 C</u> 728	<u>11,466 C</u> 728	<u>11,743 C</u> 728	<u>13,798 C</u> 1,568	0 0	Other Improvements In 5 wells 4,000 acre burn/seed	This Zone:

240 C - Cattle
S - Sheep

Total AUMs for Resource Area								
Initial or Short Term	216,348	123,461	123,461	92,308	123,461	236,316	0	
Long Term	216,348	128,208	-	98,394	128,208	-	0	

EGAN RESOURCE MANAGEMENT PLAN

Appendix 3

Vegetation Type Acreages By Zone

	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Total Acres by Veg. Type
Aspen (PNV* Conifer)	2,118	1,380	1,779			5,277
Aspen (PNV* Aspen)	2,118	1,379	1,779	-	-	5,276
Meadow	15,433	14,600	9,598	176	2,610	42,417
Flood Plain/Basin Wildrye	14,373	10,100	53,297	-	9,828	87,598
Salt Desert-Shadscale	70,779	457,607	17,212	20,127	59,038	624,763
Salt Desert-Greasewood	18,214	8,688	50,047	-	-	76,949
Northern Desert Shrub Big/Black Sagebrush	332,823	448,062	386,089	26,822	110,624	1,304,420
Woodland - Pinyon & Juniper	262,251	650,156	328,607	94,345	91,257	1,426,616
Mountain Brush - Mountain Mahogany	12,986	24,648	40,808	2,259	-	80,701
Mixed Conifer/Bristlecone Pine	3,142	23,681	20,012	-	-	46,835
Playa	11,447	1,294	-	-	-	12,741
Crested Wheatgrass	26,944	19,653	52,649	9,411	12,761	121,418
Salt Desert-Winterfat	104,648	85,842	-	-	41,524	232,014
Total Acres by Zone	878,276	1,747,090	961,877	153,140	327,642	4,068,025

* See Glossary

EGAN RESOURCE MANAGEMENT PLAN

Appendix 4

Seral Stages for the Proposed Plan by Vegetation Type

The following pages in Appendix 4 list the various seral stages by the eleven vegetation types found in the Egan Resource Area. Each page lists a vegetation description of the various seral stages, followed by a percentage of that seral stage for the resource area (existing situation) and an anticipated percentage of that seral stage for the resource area. The anticipated percentages are expected to result from the implementation of various management actions.

An example would be the pinyon-juniper vegetation type. Currently, 46% of this type is a closed community of mature, overmature decadent trees, with little understory available. Through proposed management practices, we anticipated this will eventually be reduced to 45% or there will be a reduction of 14,266 acres in this type (see Appendix 3 for acreage figures).

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Aspen (PNC Aspen)

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass and weedy forb/ even age old increaser and shrub.	0	0
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb/Aspen suckers/mixed age group increaser and decreaser shrub.	12	21
Late Seral	Perennial decreaser and increaser grass/desirable forb/ young Aspen trees and suckers/mixed age group decreaser shrub.	77	69
Potential Natural Community	Perennial decreaser grass/ desirable forb/mixed age group of Aspen trees.	11	10

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Aspen (PNC Conifer)

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass and weedy forb/ even age old increaser* and shrub.	0	0
Mid-Seral	Perennial increase and decreaser* grass/weedy and desirable forb/Aspen suckers/young conifer.	12	21
Late Seral	Perennial decreaser and increaser grass/desirable forb/mixed age conifer and Aspen.	77	69
Potential Natural Community*	Perennial decreaser grass/ desirable forb/mixed age conifer.	11	10

* See Glossary

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Meadow

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass/weedy forb/mixed age, old increaser shrub.	0	0
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb even age old increaser shrub.	14	15
Late Seral	Perennial decreaser and increaser grass, desirable and weedy forb.	18	18
Potential Natural Community	Perennial decreaser grass/ desirable forb.	68	67

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Flood Plain/Basin Wild Rye, Alkali Sacaton, Inland Saltgrass

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass and weedy forb/ mixed age group increaser shrub.	0	0
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb/even age old increaser shrub.	28	29
Late Seral	Perennial decreaser and increaser grass/desirable and weedy forb/even age old increaser shrub.	36	39
Potential Natural Community	Perennial decreaser grass/ desirable forb.	36	32

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Salt Desert and Desert Shrub/Shadscale

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass, weedy forb and or even age, old decreaser and increaser shrub.	25	19
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb/old and young decreaser shrub/old increaser shrub.	1	1
Late Seral	Perennial decreaser and increaser grass/desirable and weedy forbs/mixed age group decreaser shrub.	11	11
Potential Natural Community	Perennial decreaser grass/ desirable forb/mixed age group decreaser shrub.	63	69

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (cont.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Salt Desert and Desert Shrub/Black Greasewood

Seral Stage	Vegetation Description of Seral Stage	Existing Situation	Anticipated Levels Through Management
Early Seral	Annual Grass and weedy forb/ even age old increaser and decreaser shrub.	5	6
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb/mixed age group increaser and decreaser and young and old decreaser shrub.	0	0
Late Seral	Perennial decreaser and increaser grass/desirable and weedy forb/mixed age group decreaser shrub.	6	4
Potential Natural Community	Perennial decreaser grass/desirable forb/mixed age group decreaser shrub.	89	90

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Northern Desert Shrub/Sagebrush

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass/weedy forb and or even age old increaser shrub with increaser grass.	7	7
Mid-Seral	Perennial increaser and decreaser grass, weedy and desirable forbs/old and young increaser shrubs.	8	9
Late Seral	Perennial decreaser and increaser grass/desirable and weedy forbs/mixed age group increaser shrub.	21	21
Potential Natural Community	Perennial decreaser grass/ desirable forb/mixed age groups increaser shrubs.	64	63

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Pinyon - Juniper

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass/weedy forb/young age class increaser shrub.	2	3
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb/mixed age group increaser shrubs/young age trees.	5	7
Late Seral	Perennial increaser and decreaser grass, desirable and weedy forbs/old increaser shrubs/young and midaged juniper, pinyon.	47	45
Potential Natural Community	Juniper/Pinyon Woodland closed community of mature, overmature decadent trees.	46	45

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Mountain Brush/Mountain Mahogany

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Perennial decreaser and increaser grasses/weedy forbs, decreaser and increaser shrubs/some small scattered mahogany.	7	9
Mid-Seral	Perennial decreaser and increaser grasses/weedy and desirable forbs/increaser and decreaser shrubs/clumped mountain mahogany in immature and seedling stages.	25	25
Late Seral	Few perennial grasses/few desired forbs/all ages classes of mountain mahogany/few over mature or decadent plants.	55	52
Potential Natural Community	Very few perennial grasses and forbs/shrubs only in openings/ mountain mahogany in closed stands of mature, over mature and decadent plants.	13	14

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (con't.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Mixed Conifer/Bristlecone Pine

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annuals/seedling and sapling trees mixed with krummholz few herbaceous specimens in soil pockets.	5	5
Mid-Seral	Seedlings and saplings of pine and conifer/some krummholz/ some limber pine/a greater number of herbaceous plants in soil pockets.	42	40
Late Seral	Well developed stand of bristlecone pine, mixed with limber pine and krummholz of bristlecone, limber pine/ herbaceous species grasses, forbs, and half shrubs in soil pockets.	45	45
Potential Natural Community	All age classes bristlecone pine, mostly mature, over mature and decadent age classes; older age classes of other tree species, limber pine, herbaceous species present but fewer in number than mid or late seral.	8	10

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 4 (cont.)

SERAL STAGES FOR THE PROPOSED PLAN BY VEGETATION TYPE FOR THE RESOURCE AREA
(EXISTING AND ANTICIPATED LEVELS)

Salt Desert and Desert Shrub/Winterfat

Seral Stage /	Vegetation Description of Seral Stage /	Existing Situation /	Anticipated Levels Through Management
Early Seral	Annual grass/weedy forb/old and young increaser shrub/few old decreaser shrubs.	17	16
Mid-Seral	Perennial increaser and decreaser grass/weedy and desirable forb/old and young decreaser shrub and old increaser shrub.	10	10
Late Seral	Perennial decreaser and increaser grass/desirable and weedy forb/mixed age group decreaser shrub, old increaser shrub.	39	34
Potential Natural Community	Perennial decreaser grass/desirable forb/mixed age group decreaser shrub	34	40

EGAN RESOURCE MANAGEMENT PLAN
 APPENDIX 5
 EXISTING AND PROPOSED ALLOTMENT MANAGEMENT PLANS

<u>Allotment Name</u>	<u>Grazing System</u>	<u>Class of livestock</u>	<u>Season of Use</u>	<u>Grazing Treatment (Listed on p. 23)</u>
Cold Creek	4 units with 4 pasture rest rotation 1 unit with 2 pasture deferred	Cattle	Spring	Treatment 3
			Summer	Treatment 4
			Fall	Treatment 7
				Treatment 6
				Treatment 8
Cattle Camp Cave Valley	4 pasture rest rotation 2 pastures deferred until fall	Cattle	Year-round	Treatment 3
				Treatment 4
				Treatment 5
				Treatment 6
Duck Creek Flat	4 pasture deferred	Cattle	Year-round	Treatment 3
				Treatment 7
Step toe	6 pasture deferred	Cattle	Year-round	Treatment 3 Treatment 7
Heusser Mountain	1 unit 4 pasture rest rotation 1 unit 3 pasture deferred	Cattle/sheep	Year-round	Treatment 2
				Treatment 4
				Treatment 7
				Treatment 8

PROPOSED

White Rock	4 pasture rest rotation	Cattle	Summer/Fall	
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Additional allotment management plans will be developed, but there is not sufficient information to list these presently.

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0129 Willow Springs 0915 (Conners Summit)	I	I	M	M/I	M/I	I	I	M/C	M
0401 Indian Creek	C	M/C	M/C	M/C	M	M	M	M	M
0402 Goshute Basin	I	M	M	M/C	M	M	M	I	M
0403 Cherry Creek	I	I	I	I	M/C	C	I	I	I
0404 Becky Creek	I	M/C	M/C	M/C	C	M/C	C	M/C	M
0405 North Steptoe	C	M/C	M/C	M/C	M	M	M	M/C	M
0406 Lovell Peak	C	M	M	M	M	M	M	M	M
0407 Schellbourne	C	M	M	I	M	M	I	M	M
0408 Whiteman Creek	I	I	M/C	I	I/C	I/C	M	M	C
0409 Bennett Creek	C	M/C	M/C	M/C	M	M	M	M/C	M

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con'tt.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0410 Big Indian Creek	I	I	M/C	I	I/C	I/C	I	M/C	C
0411 Middle Steptoe	C	M	M/C	M/C	M	M	C	M	C
0412 Duckcreek Flat	C	I	M/C	M/C	M	M	I	M/C	M
0413 Gold Canyon	C	M	M/C	M/C	M	M	M	I	M
0415 Steptoe	I	I	M	M	M	M	M	M	M
0416 Heusser Mountain	I	I	M/C	M/C	M	M	M	M	M
0417 Second Creek	C	M	M	M	M	M	M	M	M
0418 Gallagher Gap	M	I	M/C	I	M	M	M	M	M
0419 Duckcreek Basin	I	M	M/C	M/C	M	M	M	M/C	M
0420 Schoolhouse Spring	C	C	C	C*	C	C	C	C	C

* Kennecott SO₂ fallout limits product.

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con't.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0421 Goat Ranch	I	I	I	M	I	I	I	M/C	I
0422 Georgetown Ranch	I	I	M	I	I	M	I	C	C
0423 Duckcreek	C	M	M/C	M/C	M	M	M	M/C	M
0424 Gilford Meadows	C	M	M/C	M/C	M	M	C	M	M
0426 Cherry Creek ADP (No. Steptoe Trail)	I	I	M	I	M/C	C	I	I	C
0427 Copper Flat	I	M	M	M	M	M	M	I	M
0429 Gleason Creek	M	M	M	M	M	M	M	C	M
0433 West Schell Bench	M	M	M	M	M	M	M	C	M
0501 Medicine Butte	I	I	I	M	M	M	I	C	I
0502 No. Butte	I	I	I	I	I	I	I	M/C	I

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con't.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0503 Thirty Mile Spring	I	I	I	M	M	C	M	M	I
0504 So. Butte	I	I	M	M	M	C	M	M	M
0505 McDermitt	C	M	M/C	M	M	M	M	M/C	M
0506 So. Butte Seeding	C	M	M/C	M/C	M/C	M/C	M	M/C	M
0507 Butte Seeding	C	M	M/C	M/C	M	M	M	M/C	M
0601 Railroad Pass	I/M	I	I	I	I	I	I/M	I	I
0602 W P Seeding	I/M	I	M	M	I	M/I	I/M	M	M
0603 Cold Creek	M	I/M	I	M	M/I	M	M/I	M	I
0605 Ft. Ruby	M/I	I	M	M	I	M	M	M/I	M

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con't.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0606 Warm Springs	I	I	I	I	I	I	I	I	I
0607 Strawberry	I/M	I	M	I/M	I	I	I/M	M	M
0608 Newark	I/C	I/M	I	M	M/I	M	M/C	M	I
0609 Dry Mountain	M/I	M/I	M	M	I	I	C/M	M	M
0610 Sabala Springs	M	M/I	M	M	I/M	M	C	M	M
0612 North Pancake	I/C	I	M/I	M	I/M	M	I	M	M
0613 Six Mile	M	M/I	M/I	M	M/I	M	I/C	M	M
0614 Monte Cristo	M	M	I	M	M	I	M	I	I
0615 South Pancake	M	I	M	M	I	M	M/C	M	M

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con't.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0617 Black Point	I	I	M/C	I	I	I	M/C	M/C	C
0619 Ruby Valley	M	I	I	I/M	I	I/M	M/C	I/M	I
0620 Horse Haven	I	M/I	I	M	M/I	I/M	I/C	M	I
0621 Maverick Springs	M	I	I	I	I	M/I/C	M/C	M	I
0622 Warm Springs Trail	I	I	M	I	I	I	I	I	M
0623 Silverado	C	I	C	C	I	C	M/C	C	C
0701 Duckwater	I	I	I	I	I	I	I	I	I
0802 Moorman Ranch	I	I	I	M/I	M/I	M	I/M	I	I
0803 Tom Plain	I	I	M	M	I	M	I	C	C
0804 Indian Jake	I	I	I	I	I	I	I	C	I
0805 McQueen Flat	M	M	M	M	M	M	M	M	M

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (cont.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0806 Preston	M	I	M	I	I	M	I	C	C
0807 Sawmill Bench	M	M	M	M	M	M	M	C	M
0808 Rock Canyon	I	I	M	I	I	M	I	C	C
0810 Douglas Point	I	I	I	C	C	I	M	I	I
0811 Douglas Canyon	C	C	C	C	C	C	C	C	C
0812 Big Six Well	C	C	M	C	C	C	C	C	C
0814 Six Mile Ranch	M	M	M	M	M	M	M	C	M
0815 Dee Gee Spring	I	I	M	I	I	C	I	C	C
0816 North Cove	M	I	I	I	I	I	I	I	I
0817 Cove	M	I	M	I	M	I	C	C	M
0818 Sorenson Well	C	C	C	C	C	C	C	C	C

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con'tt.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0819 Wells Station	M	I	I	I	I	I	I	C	I
0821 Jakes Unit Trail	C	I	M	I	I	I	I	I	M
0822 Preston Lund Trail	C	I	M	I	I	I	I	I	M
0823 Badger Spring	I	I	I	M/C	M	M	I	M/C	I
0824 Willow Springs Seeding	M	M	M	M	M	M	M	C	M
0825 Willow Springs Addition	M	M	M	M	M	M	M	C	M
0826 Giroux Wash	M	M	I	M	M	I	I	C	I
0827 Dark Peak	I	I	I	I	M	I	I	C	I
0828 Maybe Seeding	M	M	M	M	M	M	M	M	M
0829 Sheep Trail Seeding	M	M	M	M	M	M	M	C	M
0830 East Wells	C	C	C	C	C	C	C	C	C

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con't.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0831 Brown Knoll	I/M	I	I	M	M	I	I/M	C	I
0832 Swamp Cedar	M	M	M	M	M	M	M	C	M
0901 Tamberline	C	M/C	M	M	M	M	M	M/C	M
0902 White Rock	M	I	I	I	I	I	I	C	I
0903 Cattle Camp/Cave Lake	I	I	I	I	I	I	I	C	I
0904 Cave Valley Ranch	I	I	I	M	M	I	M	C	I
0905 Sheep Pass	I	I	I	M	M	I	I	C	I
0906 Shingle Pass	I	I	M	M	I	I	I	M	M
0907 Haggerty Wash	M	M	M	M	M	M	M	C	M
0908 Cave Valley Seeding	M	M	M	M	M	M	C	C	M
0909 Cold Spring	C	M	M	M	M	M	M	M	M

EGAN RESOURCE MANAGEMENT PLAN

Appendix 6 (con't.)

Categorization of Allotments

Allotment	Production Potential	Current Production	Resource Conflicts	Management Practices	Forage Values	Range Trend	Invest. Return	Social Controversy	Final Designation
0910 Lake Area	I	I	I	M	M	I	I	I	I
0913 Little White Rock	M	M	M	M	M	I	M	C	M
0914 Chimney Rock	M	M	M	M	M	I	M	M	M

EGAN RESOURCE MANAGEMENT PLAN

Appendix 7

Stream Habitat Condition, Conflicts, BLM-administered Miles and Fish Species in Egan Resource Area Streams

Stream	Allotment	1981 Mi, Sp./Sum.	Fish Species Occurrence	Habitat Condition Class	Acres of Stream Riparian	Conflicts
		BLM Administered Miles				
Berry	Duck Creek - 0423	1.0	R.T. B.T.	3	1.0	Livestock grazing
Big Indian	Indian Creek - 0410	1.2	R.T. B.T.	2	1.0	Livestock grazing
Boneyard	Gilford Meadows - 0424	0.5	R.T. B.T.	2	.2	Livestock grazing
Bullwhack	Little White Rock - 0413	2.0	-----	4	.5	Livestock grazing, erosion
Cold	Cold Creek - 0603	.25	R.T. B.N.T.	1	.5	None
Connors	Cold Creek - 0603	9.0	-----	3	---	Livestock grazing, wild horses
Crystal	Duckwater - 0701	3.0	-----	2	.4	Livestock grazing, wild horses
Currant	Duckwater - 0701	2.0	B.T. R.T.	2	.05	Livestock grazing, wild horses
Deadman	Warm Springs - 0606	0.5	-----	3	1.0	Livestock grazing, wild horses
Douglas	Douglas Canyon - 0811	1.75	-----	3	---	Livestock grazing, large reservoir on private land
Duckcreek Basin	Duck Creek - 0423	1.0	S.D.?	3	14.0	Livestock grazing
Duckwater	Duckwater - 0701	1.0 (winter)	-----	---	---	-----
East	Duck Creek - 0423	1.5	B.T. R.T.	3	7.0	Livestock grazing
Egan	Cherry Creek - 0403	2.0	R.T. #	2	3.0	Livestock grazing
First	Second Creek - 0417	.75	#	1	.3	None
Fitzhugh	Second Creek - 0417	1.0	#	3	2.0	Livestock grazing, water held private land dry yrs.
Gilford	Gilford Meadows - 0424	1.0	-----	1	2.0	None
Gleason	Thirty Mile Spring - 0503	2.0	-----	2	5.0	Livestock grazing
Gold	Gold Canyon - 0413	2.2	-----	2	5.0	None at present
Goshute	Cherry Creek - 0403	7.0	U.C.T.	2	15.0	Livestock, siltation upper basin road, wild horses
Haggerty	Shingle Pass - 0906	2.0		3	1.0	Livestock, erosion
Horse and cattle	Willow Spring - 0129	2.5		4	1.0	Livestock grazing
Huntington	Railroad Pass - 0601	.25	R.T.	1	.2	None

EGAN RESOURCE MANAGEMENT PLAN

Appendix 7

Stream Habitat Condition, Conflicts, BLM-administered Miles and Fish Species in Egan Resource Area Streams

Stream	Allotment	1981 Mi, Sp./Sum.		Fish Species Occurrence	Habitat Condition Class	Acres of		Conflicts
		BLM Administered Miles				Stream	Riparian	
Illipah	Moorman Ranch - 0802	3.2		R.T. B.T. B.N.T.	2	4.0		Livestock
Illipah unnamed	Moorman Ranch - 0802	2.0		-----	4	2.0		Livestock
Indian	Indian Creek - 0410	.25		#	2	.4		Livestock
McDonald	Gilford Meadows - 0424	.25		-----	3	1.0		-----
Nine Mile	Cherry Creek - 0403	3.0		#	2	4.0		None at present
North	Duck Creek Basin - 0419	.5		R.T.	2	.03		None at present
Old Deadman	Warm Springs - 0606	2.5		-----	3	1.5		Livestock, wild horses
Paris	Medicine Butte - 0501	2.0		R.T. B.T.	2	12.0		Livestock
Pinto	Newark - 0608	1.0		R.T.	3	1.0		Livestock
Schell	Schellbourne - 0407	1.5		-----	3	1.0		Livestock
Second	Second Creek - 0417	3.0		#	3	0.0		Livestock
Snow	Medicine Butte - 0501	3.0		-----	3	.5		Livestock, ditched
Steptoe	Heusser Mountain - 0416	0.0		W.R.M.S.	4	0.0		Livestock
Tehema	Whiteman Creek - 0408	1.7		-----	3	.3		Livestock
Third	Second Creek - 0417	.5		#	1	0.0		None at present
Water Canyon	White Rock - 0902	7.0		B.T. ?	3	7.0		Livestock
Wtr Cnyn(Sadler)	Newark - 0608	2.5		#	---	15.0		-----
Whiteman	Whiteman Creek - 0408	2.0		#	1	1.0		None at present
White River	Tom Plain - 0803	1.0		RT,BNT,BT,WRMS,WRSD	3	4.0		Livestock
Willow	Lake Area - 0910	1.5		R.T. B.T.	4	2.0		Livestock
Willow-Snowball	Duckwater - 0701	2.0 (Winter)		-----	2	4.0		Livestock, wild horses
Williams	Lake Area - 0910	2.0		-----	2	.5		Livestock
Wilson-Mather	Bennett Creek - 0409	2.3		R.T. B.T.	2	4.0		Livestock, possible div. onto private land
Worthington	Duck Creek - 0423	1.0		R.T. B.T.	1	.5		None
Zips Cabin	North Steptoe - 0405	.75		-----	4	2.0		Livestock
Duck Creek	Cherry Creek - 0403	30.0 (Winter) 0.0 (Summer)		R.T. B.N.T.	4	4129.0		Livestock, wildhorses
Totals		88.9(Summer) 121.8(Winter)			4245.2			

Habitat Condition Classes for Streambanks and Shorelines.

1. Class I. Excellent - No negligible use; well-rooted vegetation (primarily grasses, sedges, and forbs); sod intact; very little, if any, erosion from vegetation areas; less than 5% bare soil showing along shoreline.
2. Class II. Good - Some use or damage; vegetation generally well-rooted; sod mostly intact; soil showing in places (6% to 15% bare soil showing overall); some surface erosion evident.
3. Class III. Fair - use or damage close to sod; vegetation shallow-rooted; moderate surface erosion (16% to 25% bare soil showing overall).
4. Class IV. Poor - Heavy to severe use or damage; vegetation generally grazed down to the soil; considerable soil showing (over 25 percent) with sod damage serious; active surface erosion a serious problem.

W = Winter

R.T. = Rainbow trout

U.C.T. = Utah Cutthroat trout

W.R.S.D. = White River Speckled Dace

D = Dry

B.T. = Brook trout

S.D. = Steptoe Dace

D.T.C. = Duckwater Tui Chub

S = Summer

B.N.T. = Brown trout

W.R.M.S. = White River Mountain Sucker

= Proposed Utah Cutthroat Introduction

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 8

COMPARATIVE ANALYSIS OF LONG TERM IMPACTS

	Proposed Resource Management Plan	Preferred Alternative (Draft RMP)
Vegetation	The physiological needs of plant species would be met. Plant vigor and seedling success of forage species would improve, seed planting of forage species would be promoted, and repeated plant overuse would be reduced. The total amount of available forage would increase. Ground cover, species composition, and plant density would improve.	Same as proposed plan.
Livestock	There would be an increase in available AUMs, including a ten percent increase through the implementation of grazing systems and a five percent increase through the development of range improvement projects.	Same as proposed plan.
Wildlife	Big game numbers and distribution, small game distribution, and upland game distribution would all increase.	Same as proposed plan.
Wild Horses	Wild horse numbers in all herd areas will increase.	Same as proposed plan.
Realty	Community expansion and agriculture development needs would be accommodated. Utility and transportation companies would benefit through the establishment of utility and transportation corridors.	This may flood the local market and decrease land values. Utility and transportation companies would benefit through the establishment of utility and transportation corridors.
Wilderness	This would help balance the geographic distribution of areas in the National Wilderness Preservation System, expand the diversity of ecosystems represented in the Wilderness System, and would expand the opportunities for primitive recreation and solitude. The wilderness values in the South Egan Range WSA could be lost.	Same as proposed plan.

EGAN RESOURCE MANAGEMENT PLAN

APPENDIX 8 (con't.)

COMPARATIVE ANALYSIS OF LONG TERM IMPACTS

	Proposed Resource Management Plan	Preferred Alternative (Draft RMP)
Minerals and Energy	11,500 acres of land with moderate mineral potential would be lost. Some geothermal potential would also be lost.	Same as proposed plan.
Social	There would be minimal overall impacts on the local community. There would be no significant impacts to current lifestyles, interactional patterns, leadership structure or community viability.	Same as proposed plan.
Economics	No significant alteration of the area economy would occur due to wilderness designation. There could be adverse financial impacts on local governments if the tax revenues do not meet the expenses incurred in providing services to outlying developments. There would be positive improvements and moderately beneficial economic effects.	Same as proposed plan.
Forestry	There would be a sixteen percent reduction in the manageable woodland acreage. This will not affect the forestry program.	Same as proposed plan.
Water Resources	Water quality will increase due to the improvement of the vegetation and watershed as a whole.	Same as proposed plan.
Cultural Resources	Most potential adverse impacts to sites would be avoided through adherence to standard operating procedures. Some sites may be destroyed, however, due to incomplete cultural resources data.	Same as proposed plan.

Revisions and Errata

DEIS page 201, title. Revise "Riparian Condition Rating for Streams" to "Fisheries Habitat Condition Rating for Streams."

GLOSSARY

GLOSSARY

DECREASER: A plant species whose frequency of occurrence lessens with grazing pressure.

DISRUPTION: Any significant change in livestock management practices, e.g., trucking livestock as opposed to historic trailing, which are brought about by forces outside of the permittee's control.

FRAGILE AND UNIQUE RESOURCES: Any of a number of resources, e.g., caves, species, habitat types, etc., that could be adversely affected by the Bureau of Land Management actions.

GOODS AND SERVICES: Goods are tangible, physical commodities provided for material consumption or use. They may be utilized in their natural state or enter the production process as raw materials. Goods provided by the public lands include range forage for livestock, habitat for big game, mineral resources, and land itself. Services represent the provision of activities or opportunities which accommodate the needs of public land users. Recreation in all of its many and varied forms is included, as is maintenance of range facilities and access.

INCREASER: A plant species whose frequency of occurrence increases with grazing pressure.

MANAGEABILITY: A requirement for wilderness studies that states an area recommended suitable for wilderness must be capable of being effectively managed to preserve its wilderness character.

NATURAL RESOURCE VALUES: The values (both esthetic and economic) that are placed on natural resources, e.g. wildlife, wild horses, habitats, etc.

POTENTIAL NATURAL COMMUNITY: The biotic community that would become established if all successional sequences were completed without interferences by man under the present environmental conditions.

SUMMER MILES OF STREAMS: Miles of streams within the area that are subject to annual dry-ups during the summer months due to evaporation or diversion to private property for irrigation.

SUSTAINED USE CAPABILITIES: The amount of use a resource can withstand without significantly affecting that resource.

WINTER MILES OF STREAMS: Miles of streams within the area that actually flows when there is a minimum amount of dry-up. This is the maximum length of the stream and usually occurs during the winter months.

Revisions and Errata

DEIS page 264 DESIGNATED CORRIDORS. Revise this definition to "EXISTING CORRIDORS: A preferred location for expansion which has an existing transmission or transportation facility and room for expansion."

DEIS page 264 RIPARIAN. Revise this definition to "RIPARIAN VEGETATION: An area of vegetation adjacent to or situated near a body of water or a mesic (moist) site."

REFERENCES

REFERENCES

Western Utility Group, 1980 Western Regional Corridor Study.