United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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In Reply Refer to: 4130/1792 (NV010.08) #2700085

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Dear Interested Public:

The Bureau of Land Management has developed an environmental assessment (EA) # LLNV-W01000-2009-0003-EA for the proposed Ten Year Grazing Permit Renewal - Jersey Valley, Hole in the Wall and Home Station Gap Allotments and it is now available for public review and The EA discloses the environmental consequences expected as a result of implementing the proposal.

This EA has been prepared to analyze the environmental effects of livestock grazing on the Jersey Valley, Hole in the Wall and Home Station Gap allotments ((T.26 N, R.39 E., T.26 N. R.40 E., T.25 N. R.37 E., T.25 N. R.38 E., T.25 N. R.39E, T.25 N. R.40 E., T.24 N. R.38 E., T.24 N. R.39 E., T.24 N. R.40 E., T.23 N. R.37 E., T.23 N. R.38 E., T.23 N. R.39 E., T.23 N. R.40 E.). The proposed action is to issue a ten year livestock grazing permit with terms and conditions that will continue to meet the Standards for Rangeland Health (SRH) or make significant progress toward meeting the SRH and the Multiple Use Objectives established for the Jersey Valley, Hole in the Wall and Home Station Gap Allotments.

It can be reviewed online at:

http://www.blm.gov/nv/st/en/fo/wfo/blm information/nepa0/rangeland management.html or in hardcopy at the BLM Humboldt River Field Office. Hardcopies are also available upon request.

The BLM would appreciate receiving comments on this preliminary EA by the close of business on March 30, 2009. Written comments should be directed to Robert J. Edwards, Field Manager, Humboldt River Field Office, 5100 E. Winnemucca Blvd., Winnemucca NV 89445-2921. Comments can also be submitted by email to NV WFO Webmail@blm.gov. Email messages should include "Jersey Valley, Hole in the Wall and Home Station Gap EA" in the subject line.

Your address, phone number, e-mail address, or other personal identifying information in your comment, will be made publicly available when the grazing decision is issued. While some information such as your phone number and e-mail address are optional, your mailing address must be included to keep you informed regarding the grazing decision and any appeals in accordance with 43 CFR 4.471(b)(1).

Cathy Barcomb

From:

Sent:

Friday, January 30, 2009 10:16 AM

To:

Cathy Barcomb

Subject:

Jersey, Hole in the Wall, Home

Attachments: Jersey Allotment.doc

I am a little tired of sending these types of letters, only in the view that they are trashed on receiving them.

As far as the horse issue.

- 1. The horse person thought the AML was determined in 1981 MFP III. Wrong.
- 2. The horse person does not know that MFP III required 3 and 5 year evaluations to determine numbers.
- 3. The horse person realizes that random gathers over the past 11 years has resulted in small numbers of horses without any consideration for genetic pools....they just culled what they thought they could adop. So where did she go in the gather plans or EAs.
- 4. The EA did not take in account the 30% utilization limit on riparian vegetation by wild horses and cattle to be monitored or evaluated. Therefore, no new AML or validation.
- 5. The Proposed Action is to remove cattle every other year from summer use areas or riparian areas. This action might present an opportunity to monitor riparian habitat use by strictly horses, but given the total lack of knowledge or process to adjust numbers according to monitoring, BLM will receive this on deaf ears.

I would suggest that BLM employees learn and participate in these matters rather than act like Virginia City Advocates that speak loud and think not......

March 12, 2009

Robert J. Edwards, Field Manager Humboldt River Field Office Bureau of Land Management 5100 Winnemucca Boulevard Winnemucca, Nevada 89445-2921

Re: EA for the Proposed 10 Year Grazing Renewal–Jersey Valley, Hole in the Wall, and Home Station Gap Allotments

Dear Mr. Edwards;

The Wild Horse Commission has received and reviewed the notification letter and EA on the BLM's website. We have reviewed the preliminary environmental assessment for reissuance of the 10 year Grazing Permits and sustaining appropriate management levels for affected wild horse herds.

We have reviewed the comments submitted by our sister agency, the Nevada Department of Wildlife. We concur and support their comments as submitted:

"Allotment specific objectives established under the Sonoma-Gerlach Final Grazing Environmental Impact Statement and Management Framework Plan Decisions are binding conditions of the 1997 Multiple Use Decisions and these pending decisions.

As a matter of land use plan implementation, the previous allotment evaluations established carrying capacities and allocated forage to livestock permits and to establish wild horse appropriate management levels. Appropriate management levels of wild horses were not established in the land use plan of 1981. At that time in the 1990's,

Robert J. Edwards, Field Manager March 12, 2009 Page 2

allowable use levels or objectives were established to be management triggers for ungulates and measurable aspects of vegetation for the Bureau to monitor and adjust numbers as necessary. This environmental assessment shows no evidence that these previous permit conditions were monitored or enforced. Without meaningful rangeland monitoring data in this document, the ten year old appropriate management levels cannot be validated nor adjusted as necessary, as required by your present land use plan.

Proposed livestock grazing seasons of use are justified by pending rangeland projects that are neither completed nor funded for the implementation of new grazing permits. Additional allotment specific objectives now appear not to be monitored or assessed by the document. With additional Guidelines applied by the Resource Advisory Council to assure proper functioning condition of uplands and riparian habitats, the document has failed to provide any data to justify the past and future management strategies or decisions.

The preliminary environmental assessment provides an opportunity to properly assess rangeland monitoring data and propose meaningful management actions to fully implement the present land use plan and Rangeland Health Criteria required by regulation. This effort will require the determination of a carrying capacity and actions to achieve a viable thriving natural ecosystem as required by the Wild Horse and Burro Act."

I personally was on a field tour of this area with BLM and took many photos a year ago. The area is in severe condition and needs intense management strategies to work towards restoring the land.

Prior to issuing another document after evaluating comments you receive, I would suggest a range tour including affected parties such as Department of Wildlife, Wild Horse Commission, permittees, RAC members, and open to other members of the public on your affected party mailing list. This could be a work in progress of all parties and working towards consensus on restoration, but needs to be transparent and with serious strategies to manage the area, not just issue another permit without necessary changes.

Thank you for considering these matters and we look forward to working with you...

Sincerely,

CATHERINE BARCOMB Administrator

Mr. Gene Seidlitz Winnemucca Field Office Bureau of Land Management 5100 Winnemucca Boulevard Winnemucca, Nevada 89445

Re: PEA – Jersey Valley, Hole in the Wall, and Home Station Allotments

Dear Gene:

The Nevada Department of Wildlife has reviewed the preliminary environmental assessment for re-issuance of 10 year Grazing Permits and sustaining appropriate management levels for affected wild horse herds. Allotment specific objectives established under the Sonoma-Gerlach Final Grazing Environmental Impact Statement and Management Framework Plan Decisions are binding conditions of the 1997 Multiple Use Decisions and these pending decisions.

As a matter of land use plan implementation, the previous allotment evaluations established carrying capacities and allocated forage to livestock permits and to establish wild horse appropriate management levels. Appropriate management levels of wild horses were not established in the land use plan of 1981. At that time in the 1990's, allowable use levels or objectives were established to be management triggers for ungulates and measurable aspects of vegetation for the Bureau to monitor and adjust numbers as necessary. The said environmental assessment shows no evidence that these previous permit conditions were monitored or enforced. Without meaningful rangeland monitoring data in this document, the ten year old appropriate management levels cannot be validated nor adjusted as necessary, as required by your present land use plan.

Proposed livestock grazing seasons of use are justified by pending rangeland projects that are neither completed nor funded for the implementation of new grazing permits. Additional allotment specific objectives now appear not to be monitored or assessed by the document. With additional Guidelines applied by the Resource Advisory Council to assure proper functioning condition of uplands and riparian habitats, the document has failed to provide any data to justify the past and future management strategies or decisions.

Mr. Gene Seidlitz January 30, 2009 Page 2

The preliminary environmental assessment provides an opportunity to properly assess rangeland monitoring data and propose meaningful management actions to fully implement the present land use plan and Rangeland Health Criteria required by regulation. This effort will require the determination of a carrying capacity and actions to achieve a viable thriving natural ecosystem as require by the Wild Horse and Burro Act.

Thank you for considering these matters.

Sincerely,

Roy Leach Western Region

cc. Kyle Neill