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FINAL

PARADISE-DENIO GRAZING ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WINNEMUCCA DISTRICT, NEVADA



1981

PREFACE

The Final Paradise-Denio Grazing Environmental Impact Statement (FEIS) has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations. This FEIS must be used with the Draft EIS (INT DEIS 81-5). The FEIS includes the Summary from the DEIS, written comments received during the public review process, substantive comments presented at public hearings and the responses to those comments.

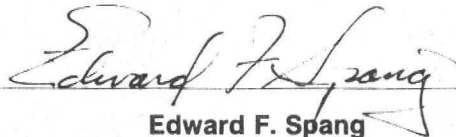
FINAL
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM

for the

PARADISE-DENIO RESOURCE AREA
Humboldt and Pershing Counties
Nevada

Prepared by

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WINNEMUCCA DISTRICT



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State Director
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The Bureau of Land Management proposes to implement a livestock grazing management program for the Paradise-Denio Resource Area of the Winnemucca District in central Nevada. This program proposes to allocate available vegetation to livestock, big game, and wild horses; determine the levels of livestock grazing management; identify needed livestock support facilities; outline a general implementation schedule and list the standard procedures for operation. Four alternatives are considered along with the proposed action. They are: No Livestock Grazing, No Action, Maximizing Livestock, and Livestock Reduction/Maximizing Wild Horses and Burros. A discussion of the affected environment is briefly summarized and the environmental consequences occurring from the proposed action and each alternative are documented in the EIS.

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

SEP 18 1981

SUMMARY

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

The Bureau of Land Management (BLM) proposes to implement a livestock grazing management program in the Paradise-Denio Resource Area of the Winnemucca District. The Paradise-Denio Resource Area encompasses approximately four million acres, nearly all of Humboldt County in northwestern Nevada. Intermingled with these public lands are approximately 602,000 acres of private, state and other lands. The Humboldt National Forest has boundaries within the Paradise-Denio Resource Area (reference Land Status Map in Chapter 1 of the DEIS).

Analyzed in this environmental impact statement (EIS) are the proposed action and four alternatives: No Livestock Grazing, No Action, Maximizing Livestock, and Livestock Reduction/Maximizing Wild Horses and Burros (Summary Table 1).

Components of the proposed action (the BLM's preferred alternative) and each alternative include the analysis of: (1) Vegetation Allocation Program (Summary Figure 1), (2) Levels of Grazing Management (Summary Table 3), (3) Livestock Support Facilities (Summary Table 4), (4) General Implementation Schedule and, (5) Standard Operating Procedures. A detailed description of each alternative is presented in Chapter 1.

Chapter 1 explains the alternatives, including the proposed action. Chapter 2 describes the present condition of the resource area. Analyses of the alternatives including the proposed action are provided in Chapter 3, along with discussions of avoidable and unavoidable impacts and measures that might lessen the effect of the more severe impacts. Technical and backup data are in the Appendixes.

COORDINATED RESOURCE MANAGEMENT AND PLANNING

The 1978 range survey was the source of the production data analyzed in the EIS and was the best information available at the time; however, it is the intent of the Bureau to gather additional rangeland data via monitoring prior to initiating adjustments. Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies. These studies will be obtained from an intensive, coordinated monitoring effort involving all affected interest groups (Coordinated Resource Management and Planning). Pending this data collection,

livestock and wild horse use may continue at approximately current levels, except where agreements are reached with livestock users and/or wild horse and burro interests.

Coordinated Resource Management and Planning (CRMP) is a process that brings together all interests concerned with the management of resources in a given local area: landowners, land management agencies, users, wildlife groups, wild horse groups, conservation organizations, etc.

The CRMP process would not necessarily require participation by the formal CRMP committee. The process may be accomplished in a more informal manner, initiated by either the BLM or the range user. Regardless of the approach, all affected interests will be afforded the opportunity to actively participate in the process.

Prior to initiating grazing adjustments the Bureau, within the framework of the Management Framework Plan and CRMP, will consider the specific management objectives for the allotment and other resource values (e.g., riparian zones, water quality, wildlife, recreation, wild horses and burros, livestock) to be evaluated to determine progress in meeting those objectives. Changes in the resource values may warrant a modification of the scheduled adjustments. Other information necessary to set forth actions required to achieve the resource management objectives for the allotment may also be considered. These objectives will indicate the intensity and types of monitoring that will be required in each allotment; however, as a minimum, studies will include rangeland condition, trend, utilization, actual use and climate data.

Monitoring of key management species in key and/or critical management areas will be based on and tailored to the preliminary management objectives for the allotments.

If monitoring and evaluation procedures determine that management objectives are not being achieved, management modifications will be made that may include, but are not necessarily limited to, period of use, livestock and/or wild horse and burro numbers, management intensity, grazing system, range improvement, or any combination of revisions in order to attain management objectives.

SUMMARY OF IMPACTS

The environmental impacts of the alternatives, including the proposed action, as discussed in Chapter 3 are shown in comparative form (Summary

Table 1). This table outlines the issues and provides a basis for public review and a basis for making a choice among options by the decision maker.

Impacts or changes resulting from various proposed actions on the area's people, animals or resources are discussed. Impacts may be considered significant or not significant, depending on the amount or type of change caused by the proposals (see DEIS Chapter 3, Introduction). Also, significant impacts are determined to be beneficial (good) or adverse (bad).

Different periods of time are used in the analysis of impacts--short term (1991) and long term (2024). The decisions for action are scheduled for 1982; then seven years are allowed for the BLM to implement range improvements and land treatments. The two years until 1991 (short term) are for the land treatments to become fully effective. The long-term date (2024) is 35 years after implementation (1989). (See Summary Figure 2.)

Summary Table 5 shows the relationship between the general planning objectives presented in Chapter 1 of the DEIS, and how well each alternative meets those objectives.

AREAS OF CONTROVERSY

The scoping process, as a part of the BLM planning system, is designed to inform the public about the area manager's land use recommendations and to collect questions and comments from land users and other interested persons.

Early in 1980 the Paradise-Denio's scoping meetings brought in 23 letters with comments and questions indicating the following areas of concern:

VEGETATION

- Survey Methodology
- Present Condition & Trend
- Use and Management of Annual Vegetation
- Allotment Management Plans (AMPs)
- Proper Period-of-use
- Vegetation Changes
- Grasshoppers
- Ground Squirrels
- Selective Production Improvement
- Introduction of New Species

WATER RESOURCES

- Weather modification

SOILS

- Soil Development
- Productivity

RECREATION

- Camp site areas

All of the above were considered in the analysis process and considered in the EIS.

Specific comments included: (1) all the proposed alternatives were unrealistic, (2) Alternative E (to reduce livestock grazing 40-50 percent below the level of the Proposed Action) was unnecessary because the Proposed Action cuts were substantial, (3) Alternative F (elimination or adjustment of allotment boundaries or equal grazing reductions for all users) was impractical and unworkable and (4) coordinated resource management and planning should be used when implementing decisions.

These comments influenced the scope of the EIS. Alternative E was dropped because it was considered unrealistic and Alternative F because it was unworkable.

The allocation of vegetation: respondents questioned the validity of the range survey, the reasons for the current survey allocating only 120,000 animal unit months (AUMs) whereas the 1968 survey had allocated more than twice that number, and disapproved of period-of-use, key species and suitability criteria. One person wrote that the allocation of vegetation was disproportionate and that at least half of the vegetation should go to wildlife and wild horses.

The Winnemucca District is obligated by law and BLM Directives to allocate only the amount of available vegetation, and to allocate vegetation to wildlife and wild horses.

Wild horse management comments included: a wild horse area separate from the rest of the area would be a step in the right direction, a separate wild horse area meant that the BLM was catering to the stockmen and disagreement with the removal of cattle from the proposed wild horse area.

Range improvement comments varied from the one which asked for more seedings, sprayings and burnings than the maximizing livestock alternative proposed to some which questioned the need for the improvements listed in the proposed action.

Disregarding costs, all potentially feasible sites for seeding, spraying and burning have been studied for the maximum livestock alternative. The proposed action includes only those sites on which the improvements are economically feasible.

Economic and social issues' comments showed fear of regional and economic losses because of the proposed grazing cuts and also the loss of a unique culture if ranchers are forced to sell their ranches and move away.

Both economic and social issues are addressed in this EIS.

One person wrote that livestock reductions would make ranching uneconomical and, therefore, eventually nonexistent. The results would then be catastrophic because: (1) fire control would be difficult, (2) populations of insects and small mammals would become unmanageable and (3) fish and wildlife populations would be seriously reduced.

SUMMARY TABLE 1
SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>WATER RESOURCES</u>				
<u>WATER QUALITY:</u> <u>Adverse impact:</u>	<u>Beneficial impact:</u>	Same as proposed action except <u>adverse impact:</u>	Same as proposed action except <u>adverse impact:</u>	Same as proposed action except <u>adverse impact:</u>
13 streams exceed turbidity standards, and 14 streams exceed temperature standards	streams and reservoirs previously impacted	Onion Valley Reservoir, which would exceed turbidity standards	Onion Valley Reservoir which would exceed turbidity standards	Onion Valley Reservoir which would exceed turbidity standards
<u>VEGETATION</u>				
<u>Long-term beneficial impacts:</u>	<u>Long-term beneficial impacts:</u>	<u>Long-term adverse impacts:</u>	<u>Long-term beneficial impacts:</u>	<u>Long-term beneficial impacts:</u>
4% (167,278 acres) in good condition	13% more (501,596 acres) in good condition	3% less (94,207 acres) in good condition	condition class changes are the same as the proposed action	condition class changes are the same as the proposed action
9% more (313,672 acres) in fair condition	3% more (103,123 acres) in fair condition	9% less (359,144) in fair condition	120% (128,298 AUMs) increase in available vegetation	76% (72,283 AUMs) increase in available vegetation
13% less (480,950 acres) in poor condition	16% less (604,719 acres) in poor condition	12% more in poor condition	<u>Adverse impact:</u>	to riparian areas in herd management areas
86% (91,117 AUMs) increase in available vegetation	27% (26,013 AUMs) increase in available vegetation	47% decrease in available vegetation	continued degradation of riparian areas and aspen stands	<u>Adverse impact:</u>
<u>Adverse impact:</u>	riparian areas and aspen stands	continued degradation of riparian areas and aspen stands		continued degradation of riparian areas and aspen stands
continued degradation of riparian areas and aspen stands				

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>WILDLIFE</u>				
Long-term <u>beneficial</u> impacts:	<u>Beneficial</u> impact:	Long-term <u>adverse</u> impacts:	Long-term <u>beneficial</u> impacts:	<u>Beneficial</u> impact:
increase of 194 antelope	same as the proposed action	reduce mule deer by 3,544	increase in 157 antelope	same as the proposed action
vegetation for 753 bighorn sheep	<u>Adverse</u> impact:	reduce antelope by 357	vegetation for 753 bighorn sheep	<u>Adverse</u> impact:
50% increase in sage grouse and quail	mule deer reduced by 549	cancel reintroduction of bighorn sheep	50% increase in sage grouse and quail	mule deer reduced by 765
overall increase in nongame bird numbers		reduce sage grouse and nongame birds	overall increase in nongame bird numbers	
<u>Adverse</u> impact:			<u>Adverse</u> impact:	
mule deer reduced by 730			mule deer reduced by 1,135	
<u>AQUATIC HABITAT</u>				
<u>Adverse</u> impact:	<u>Beneficial</u> impacts:	<u>Adverse</u> impacts:	<u>Adverse</u> impacts:	<u>Adverse</u> impacts:
17 streams	Onion Valley Reservoir	18 streams	17 streams	16 streams
<u>Beneficial</u> impacts:	20 streams	Onion Valley Reservoir	Onion Valley Reservoir	Onion Valley Reservoir
Onion Valley Reservoir		<u>Beneficial</u> impact:	<u>Beneficial</u> impact:	<u>Beneficial</u> impact:
3 streams		2 streams	3 streams	4 streams

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>WILD HORSE AND BURRO</u>				
<u>Adverse impacts:</u>	<u>Adverse impacts:</u>	<u>Adverse impacts:</u>	Impacts are the same as the proposed action	Impacts are the same as the no livestock grazing alternative
horses restricted to one area	reduction of wild horses and burros from 2495 to 700	the health and vigor of horses		
reduction of wild horses and burros from 2495 to 386	8% death loss caused by gathering	fences which impede the free roaming nature of horses would not be removed		
8% death loss caused by gathering	loss of some traits	8% death loss caused by gathering		
loss of some traits	change in herd viability			
change in herd viability	<u>Long-term beneficial impacts:</u>	<u>Beneficial impacts:</u>		
<u>Long-term beneficial impacts:</u>	6 wild horse and burro areas	13 wild horse and burro areas		
fences would be removed to allow free roaming of horses	health and vigor would improve	little change in herd viability		
horse health and vigor would improve	fences would be removed to allow free roaming of horses	less chance of loss of traits		
		horse numbers remain at 2495		

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>VISUAL RESOURCES</u>				
<u>Adverse impact:</u> could be caused by 42,954 acres of seedings	No impacts	No impacts	<u>Adverse impacts:</u> could be caused by 42,954 acres seeding and 780 acres of sagebrush control near Onion Valley Reservoir	Same as proposed action
<u>CULTURAL RESOURCES</u>				
<u>Adverse impacts:</u> trampling damage from livestock, wild horses and burros grazing-related erosion construction of livestock support facilities	<u>Adverse impact:</u> wild horse trampling damage	<u>Adverse impacts:</u> trampling damage from livestock, wild horses and burros grazing-related erosion	Same as proposed action	Same as proposed action

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>RECREATION</u>				
<u>Long-term adverse impacts:</u>	<u>Long-term beneficial impacts:</u>	<u>Adverse impacts:</u>	<u>Adverse impacts:</u>	<u>Adverse impacts:</u>
in general, wildlife numbers would not meet hunting demand	fishing and recreation at Onion Valley Reservoir	similar to proposed action except:	similar to proposed action except:	similar to proposed action except:
stream fishing would not increase in quality and therefore would not meet demand	fishing in 20 streams would improve, and would meet demand	Onion Valley Reservoir would not be fenced	Onion Valley Reservoir would not be fenced	Onion Valley Reservoir would not be fenced
<u>Beneficial impact:</u>	<u>Long-term adverse impact:</u>			
the fencing of Onion Valley Reservoir	wildlife numbers would increase but they would not meet demand			

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>LIVESTOCK</u>				
<u>Adverse impacts:</u>	<u>Adverse impact:</u>	<u>Adverse impacts:</u>	<u>Adverse impacts:</u>	<u>Adverse impacts:</u>
initial allocation (1982) 101,689 AUMs	there would be no livestock grazing	weaning weights calf and lamb crops	initial allocation (1982) 101,888 AUMs	initial allocation (1982) 86,677 AUMs
short term (1991) 161,893 AUMs	(See Summary Figure 1 for comparison of allocations)	increase in death loss	Long-term <u>beneficial</u> impacts:	short term (1991) 134,226 AUMs
(See Summary Figure 1 for comparison of allocations)		(See Summary Figure 1 for comparison of allocations)	long-term allocation (2024) 228,092 AUMs	long term (2024) 150,064 AUMs
Long-term <u>beneficial</u> impact:			(See Summary Figure 1 for comparison of allocations)	(See Summary Figure 1 for comparison of allocations)
increasing calf crop, and higher weaning weights			increasing calf crop, and higher weaning weights	Long-term <u>beneficial</u> impacts: increasing calf crop and higher weaning weights

ECONOMICS

See Summary Table 2

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
<u>SOCIOLOGY</u>				
<u>Impacts to Ranching Community</u>				
Short-term <u>adverse</u> impacts:	Short- and long-term <u>adverse</u> impacts:	Long-term <u>adverse</u> impacts:	In short term, same as proposed action.	Same as proposed action except for some resentment from losing AUMs to wild horses
ranchers would be required to alter historic management patterns, forego economic gain and in extreme cases may be displaced	may leave livestock industry and may relocate elsewhere	continued absence of range improvements would frustrate attempts at long-range management of operations	Long-term <u>beneficial</u> impacts: with increases in AUMs would improve ranchers' ability to maintain preferred lifestyle	
historic character of community may be altered	some ranchers/ranch hands may be forced into non-agricultural jobs	initial sense of relief; possible frustration in future with lack of any new range developments		
increased alienation from Federal Government; resentment of the Federal Government may dissipate in the long term	historic character of community may be altered intense State-wide rancher resentment of Federal Government			
	more active support for State seizure of public lands			

SUMMARY TABLE 1 - Continued
 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS
 PARADISE-DENIO RESOURCE AREA

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horses and Burros
SOCIOLOGY (continuation)				
<u>State and National Impacts</u>				
<u>Wildlife Interests'</u>				
<u>Group Attitudes</u>				
Approve of increases in antelope but not of decrease in mule deer numbers or lack of improvement in riparian habitat	Same as proposed action Those members favoring balanced use of public domain would oppose	Continued resentment at disproportionate number of livestock on public lands Would disapprove of long-term reductions in mule deer and antelope, and lack of improvement in riparian habitat	Same as proposed action	Same as proposed action
Continued resentment at disproportionate number of livestock on public lands				
<u>Protectionist Group Attitudes</u>				
Groups would disapprove of removal of burros and confinement of wild horses to single area	Would not be supported by wild horse protectionists who favor balanced use of public domain vegetation resources	Groups would not endorse this alternative as they feel number of all grazing animals on public lands should be reduced to reverse range deterioration	Same as proposed action	Would be closest to ideal for some members but opposed by most who favor more integrated use of public lands by all grazing animals in their natural environment
Would approve of fence removals and withdrawal of horses from checkerboard lands	Other wild horse protectionists may support			

SUMMARY TABLE 2
 SUMMARY OF SIGNIFICANT ECONOMIC IMPACTS a/
 PARADISE-DENIO RESOURCE AREA

Alternatives	Initial Impacts		Long-Term Impacts	
	Impact	Percent of 1978 Total <u>b/</u>	Impact	Percent of 1978 Total <u>b/</u>
Proposed Action				
County Sales (\$)	-3,333,000	1.7	-2,527,000	1.3
County Income (\$)	-312,000	0.7	-311,000	0.7
County Employment (FTE) <u>c/</u>	-87	2.0	-70	1.6
Rancher Wealth (\$)	-6,208,000	55.0	-1,759,000	1.6
No Livestock Grazing <u>d/</u>				
County Sales (\$)	-13,596,000	7.0		
County Income (\$)	-1,836,000	4.0		
County Employment (FTE)	-387	10.0		
Rancher Wealth (\$)	-11,293,000	100.0		
No Action Alternative No Significant Economic Impacts Would Be Expected From This Alternative.				
Maximizing Livestock				
County Sales (\$)	-3,125,000	1.6	-2,579,000	1.3
County Income (\$)	-271,000	0.6	-321,000	0.7
County Employment (FTE)	-82	1.9	-72	1.6
Rancher Wealth (\$)	-6,148,000	55.0		
Livestock Reduction/Maximizing Wild Horses and Burros				
County Sales (\$)	-4,399,000	2.3	-2,580,000	1.3
County Income (\$)	-450,000	1.0	-320,000	0.7
County Employment (FTE)	-117	2.7	-71	1.6
Rancher Wealth (\$)	-6,950,000	62.0	-3,800,000	34.0

a/ All impacts represent adverse impacts.

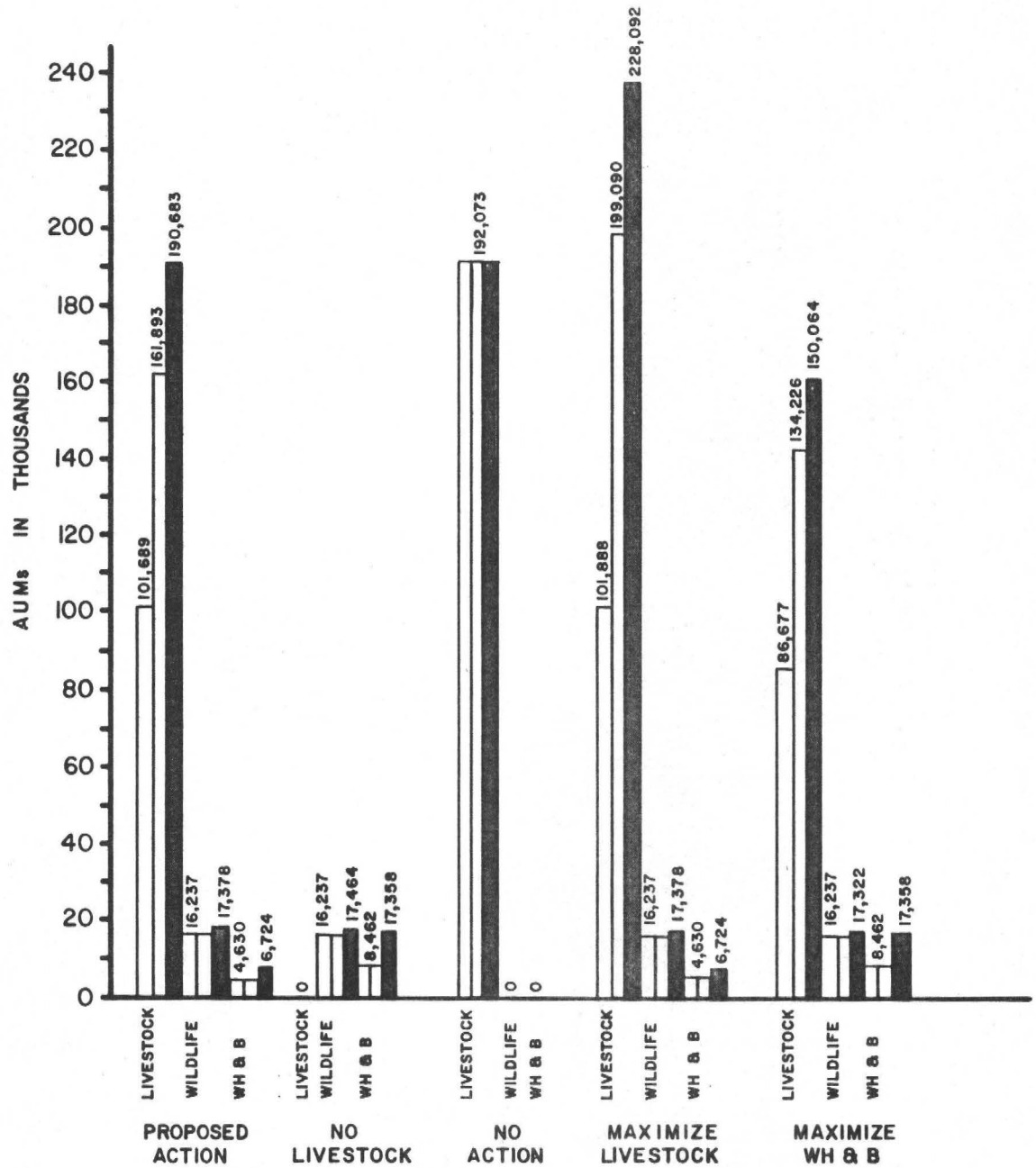
b/ The percent impact on rancher wealth indicated in the "Percent of 1978 Total" column represents the change in percent of contribution of BLM AUMs to rancher wealth.

c/ An FTE denotes a full time equivalent unit of employment. A full time equivalent represents a 2000 hour work year.

d/ Long-term impacts of the no livestock grazing alternative are similar to the initial impacts.

Source: U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Paradise-Denio Environmental Impact Statement Team, 1980.

SUMMARY FIGURE I
VEGETATION ALLOCATION
PROGRAM (AUMs)



VEGETATION BY ALTERNATIVES
 □ INITIAL ALLOCATION (1982)
 ▨ SHORT TERM ALLOCATION (1991) †
 ■ LONG TERM ALLOCATION (2024)

SUMMARY TABLE 3
 PROPOSED LEVELS OF GRAZING MANAGEMENT a/
 PARADISE-DENIO RESOURCE AREA

Type of Action	Intensive Management <u>a/</u>		Less Intensive Management <u>c/</u>		No Livestock Grazing	
	Allotments	Acres	Allotments	Acres	Allotments	Acres
Proposed Action	57	2,984,780	5	184,073 <u>d/</u>	3	433,393 <u>d/</u>
No Livestock Grazing	-	-	-	-	65	3,602,246
No Action	34	1,615,607	30	1,779,818	1	206,821
Maximizing Livestock	64	3,381,436	-	-	1	220,810
Livestock Reduction/ Maximizing Wild Horse and Burro	54	2,232,720	7	759,037 <u>e/</u>	4	670,489 <u>e/</u>

a/ Twelve allotments not listed here, with a total of 126,368 acres, lie within the Winnemucca District boundary but are administered by another district or state. The administering entity will determine management levels in accordance with existing inter-district agreements.

b/ Those allotments that would have a specified grazing system under an allotment management plan (AMP).

c/ Those allotments that would not have an allotment management plan.

d/ In the long term (2024) no livestock grazing category will decrease to two allotments and 429,631 acres.

The less intensive management category will increase to six allotments and 187,835 acres.

e/ In the long term (2024) no livestock grazing category will decrease to three allotments and 606,727 acres.

The less intensive management category will increase to eight allotments and 762,799 acres.

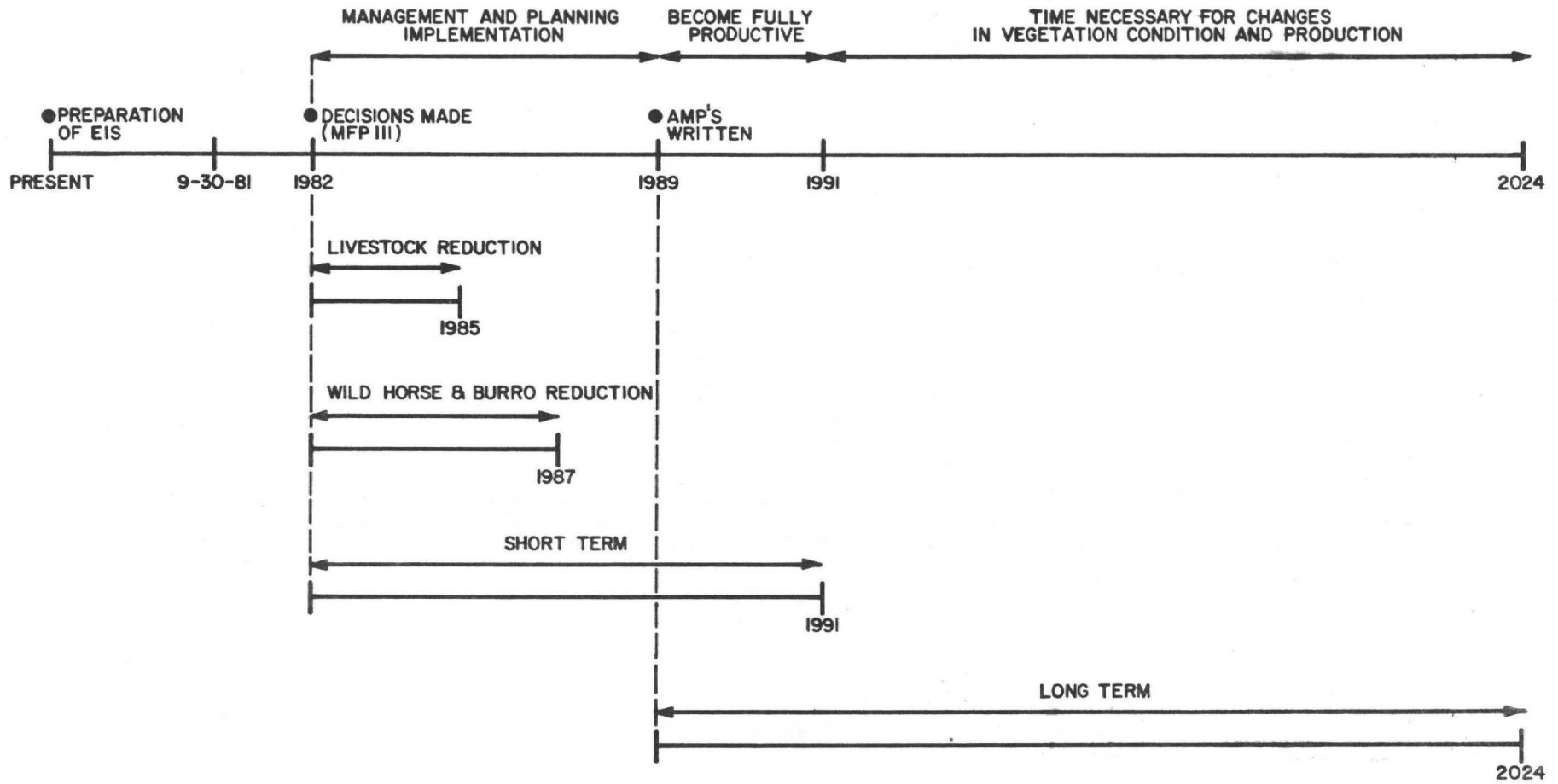
Source: U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Paradise-Denio Environmental Impact Statement Team 1980.

SUMMARY TABLE 4
LIVESTOCK SUPPORT FACILITIES
PARADISE-DENIO RESOURCE AREA

Alternative	Proposed Facilities							Land Treatments (acres)			Removal Fence Removal (miles)	Estimated Cost (Dollars)
	Wells	Pipelines (miles)	Reservoirs	Springs	Troughs	Fences (miles)	Cattle- guards	Sagebrush Control	Seeding	Prescribed Burning		
Proposed Action	18	5.5	1	2	24	247.5	10	140,783	113,966	0	4	9,000,928
No Livestock Grazing	0	0	0	0	0	0	0	0	0	0	0	0
No Action	0	0	0	0	0	0	0	0	0	0	0	0
Maximizing Livestock	18	5.5	1	2	24	277.5	10	236,068	175,031	33,962	4	13,890,510
Livestock Reduction/ Maximizing Wild Horses & Burros	18	5.5	1	2	24	195.0	9	100,973	99,246	0	4	7,436,218
Existing Situation	112	271.5	129	259	600	1565.0	166	89,780	121,643	-	-	-

Source: U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Paradise and Denio Unit Resource Analyses (1979) and Paradise-Denio Environmental Impact Statement Team, compiled from Chapter 1 (1980).

SUMMARY FIGURE 2 TIME FRAMES PROPOSED ACTION AND ALTERNATIVES



SOURCE: U.S.D.I., B.L.M., PARADISE—DENIO ENVIRONMENTAL IMPACT STATEMENT

SUMMARY TABLE 5
RELATIONSHIP BETWEEN THE GENERAL OBJECTIVES AND THE ALTERNATIVES a/
PARADISE-DENIO RESOURCE AREA

General Objectives	Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock	Livestock Reduction/ Maximizing Wild Horse & Burro
(1) Improve habitat and forage for livestock, wildlife, and wild horses by allocation or available vegetation within the productive capability of the vegetation resource.	Meets objective	Meets objective	Does not meet objective	Meets objective	Meets objective
(2) Improve the vegetation resource by establishment of proper periods-of-use by livestock, by allotment, to meet the physiological needs of key management species.	Meets objective	Meets objective	Does not meet objective	Meets objective	Meets objective
(3) Reduce soil erosion and enhance watershed values by increasing ground cover and litter.	Meets objective	Meets objective	Does not meet objective	Meets objective	Meets objective
(4) Improve the health and productivity of wild horse herds by managing wild horse numbers and by improving forage condition.	Meets objective	Meets objective	Does not meet objective	Meets objective	Meets objective
(5) Enhance recreation values by increasing wildlife numbers through improved habitat condition.	All wildlife except mule deer meet objective; Mule deer do not meet objective	All wildlife except mule deer meet objective; Mule deer do not meet objective	All wildlife do not meet objective	All wildlife except mule deer meet objective; Mule deer do not meet objective	All wildlife except mule deer meet objective; Mule deer do not meet objective
(6) Provide suitable habitat for the reintroduction of bighorn sheep into areas where they once lived.	Meets objective	Meets objective	Does not meet objective	Meets objective	Meets objective
(7) Improve the quality of the recreation experience in the Onion Valley Reservoir Area.	Meets objective	Meets objective	Does not meet objective	Does not meet objective	Does not meet objective
(8) Improve and maintain the condition of the riparian and stream habitat.	Does not meet objective	Meets objective	Does not meet objective	Does not meet objective	Does not meet objective

a/ The general objectives are found at the beginning of Chapter 1.

Source: U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Paradise-Denio Environmental Impact Statement Team, 1980.

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ERRATA

ERRATA

TABLE OF CONTENTS

The order of pages in the DEIS was partly reversed. The pages xix thru xxiii are correct. Next is the last page numbered xxxiii, and then backward through the pages numbered xxxii, xxxi, xxx, xxix, xxviii, xxvii, xxvi, xxv and xxiv which should have been the last page of the *Table of Contents*. The Bureau regrets any inconvenience to readers because of this mix-up.

CHAPTER 1

The first sentence of the third paragraph under the LIVESTOCK SUPPORT FACILITIES on DEIS page 1-11 is changed to read "It is anticipated that big sagebrush would be controlled on approximately 140,783 acres to release understory perennial grasses from competition with these shrubs."

In Tables 1-5, 1-17, and 1-20, DEIS pages 1-12, 1-29 and 1-35, respectively, Footnote "a" is changed to read:

"While a comprehensive benefit/cost analysis on each proposed range improvement is beyond the intent of this document, it is the policy of the Bureau to construct all improvements on the basis of multiple use. The development of these facilities are required to support the proposed livestock grazing program, however, where other resource values (wildlife, wild horses and burros) exist the projects will be designed to benefit all uses.

On the Land Status and the Range Facilities and Land Treatments - Existing Maps the term "National Resource Land" should be "Public Land".

CHAPTER 2

After the fourth sentence of the first paragraph under SENSITIVE PLANTS on DEIS page 2-6 add "A revised 'Notice of Review' was published by the U.S. Fish and Wildlife Service on December 15, 1980, in the *Federal Register*, giving those plants recommended for federal listing. A draft of this was used at the November 20-21, 1980, Nevada Threatened and Endangered Plant Workshop in Reno. The results of this workshop, therefore, provide the most current recommendations for Nevada Sensitive Plants. The *Threatened and Endangered Plants*

of Nevada: An Illustrated Manual describes the sensitive plants of Nevada and discusses habitat and threats to the species."

Several additions have been made to Table 2-3 in the DEIS. See Table 2-3 in the FEIS.

On the Vegetative Types Map the term "008 Barren" should be "008 Other."

On Big Game Use Areas - Antelope and Bighorn Sheep Map the term "Yearlong" under the heading of Bighorn Sheep is changed to read "Potential Yearlong."

CHAPTER 3

The third sentence of the third paragraph under SOILS on DEIS page 3-5 is changed to read "Range treatments which include seeding and sagebrush control are proposed for approximately 255,016 acres or six percent of the area."

The second sentence of the third paragraph on DEIS page 3-13 is changed to read "An increase of this significance would result in more ground cover, reduced erosion, increased vigor in key management species and eventually increased numbers in livestock, wild horses and wildlife (professional opinion of EIS Team range conservationist) (Table 1-2)."

The first and second sentence of the first paragraph under SENSITIVE PLANTS on DEIS page 3-17 is changed to read "Five plants on the Paradise-Denio Resource Area are candidate species for threatened or endangered status. In addition, there are seven other plants listed as species of special concern and one now listed as endangered (Table 2-3)."

The second sentence of the first paragraph of 1) under MULE DEER on DEIS page 3-19, is changed to read "Available vegetation would be allocated up to carrying capacity under this proposal, but would not meet the forage demand of existing numbers area wide."

The first sentence of the second paragraph of 1) under MULE DEER on DEIS page 3-19 is changed to read "The allocation would bring the total forage demand more closely in balance with the vegetation resource."

The first sentence of the first paragraph under SOILS on DEIS page 3-73 is changed to read "This alternative involves 236,068 acres of sagebrush

TABLE 2-3
SENSITIVE PLANTS a/
PARADISE-DENIO RESOURCE AREA

Scientific Name	Common Name	Status <u>b/</u>
<u>Artemisia packardiae</u>	Packards wormwood	S
<u>Astragalus alvordensis</u>	Alvord milkvetch	S
<u>Astragalus porrectus</u>	Lahontan milkvetch	T
<u>Astragalus pterocarpus</u>	Winged milkvetch	S
<u>Astragalus solitarius</u>	Solitary milkvetch	E
<u>Astragalus yoder-williamsii</u>	Osgood Mountains milkvetch	OE
<u>Caulanthus barnebyi</u>	Barnebys wildcabbage	T
<u>Cymopterus corrugatus</u>	Corrugated cymopterus	S
<u>Eriogonum anemophilum</u>	Wind-loving buckwheat	S
<u>Hackelia ophiobia</u>	Owyhee River stickseed	E
<u>Oryctes nevadensis</u>	Nevada digger	T
<u>Pediocactus simpsonii</u> var. <u>robustion</u>	Robust Simpsons hedgehog cactus	S
<u>Psoralea kingii</u>	King's indigo bush	S

a/ Current as of November 20-21, 1980 Nevada Threatened and Endangered Workshop.

b/ OE: Officially listed as endangered in Federal Register, August 13, 1980 for a 240 day period under an emergency listing by the U.S. Fish and Wildlife Service.

The following indicate tentative status as recommended at the November 2, 1979, T/E Plant Workshop and by Mazingo and Williams 1980:

E: Endangered

T: Threatened

S: Species of Special Concern

Sources: Mazingo and Williams 1980; Pinzel 1978; Pinzel 1979; and Yoder-Williams, BLM Botanist, Winnemucca District, personal communication, 1980.

control and 175,031 acres of seeding, plus 33,962 acres of controlled burning."

The second sentence of the second paragraph under SOILS on DEIS page 3-73 is changed to read "The short-term yield of 3.55 tons/acre/year is expected to continue for three to four years after burning and would affect only 33,962 acres (.78 percent of the area)."

The first sentence of the first paragraph under SOILS on DEIS page 3-88 is changed to read "The alternative is essentially the same as the proposed action with the exception that 54,530 acres of sagebrush control and seeding would be omitted."

CHAPTER 4

Gerald Smith - partially responsible for *vegetation and livestock* sections.

B.S. (1976) Renewable Natural Resources - Range Management and Forestry from the University of Nevada at Reno.

Experience: five years as range conservationist with the Bureau of Land Management in the Winnemucca District.

BIBLIOGRAPHY

On DEIS page 8-2, the seventh and eighth references in column two, the name "Pinzel" is changed to read "Pinzl."

On DEIS page 8-4, the fourth from last reference in column one should have the word "Proposed" deleted from the title.

APPENDIX B
SECTION 2
TABLE B-4
LIVESTOCK SUPPORT FACILITIES - PROJECT DISTURBANCE TOTALS
PARADISE-DENIO RESOURCE AREA

Project Type	Units	Proposed Action		Maximizing Livestock			Livestock Reduction/ Maximizing Wild Horse and Burro		
		Short-term Acre Disturbance	Long-term Acre Disturbance	Units	Short-term Acre Disturbance	Long-term Acre Disturbance	Units	Short-term Acre Disturbance	Long-term Acre Disturbance
Sagebrush Control	140,783.0 ac.	140,783.0	0	236,068.0 ac.	236,068.0	0	100,973.0 ac.	100,973.0	0
Seeding	113,966.0 ac.	113,966.0	0	175,031.0 ac.	175,031.0	0	99,246.0 ac.	99,246.0	0
Prescribed Burning	0	0	0	33,962.0 ac.	33,962.0	0	0	0	0
Earthen Reservoir	1 ea.	3.0	3.0	1 ea.	3.0	3.0	1 ea.	3.0	3.0
Spring Development	2 ea.	.5	0	2 ea.	.5	0	2 ea.	.5	0
Wells	18 ea.	4.5	1.5	18 ea.	4.5	1.5	18 ea.	4.5	1.5
Pipelines	5.5 mi.	6.9	0	5.5 mi.	6.9	0	5.5 mi	6.9	0
Fences	246 mi.	246.0	15.0	277.5 mi.	277.5	17.0	207 mi.	207.0	12.0
Troughs	24 ea.	6.0	6.0	24 ea.	6.0	6.0	24 ea.	6.0	6.0
TOTAL		255,015.9	25.5		445,358.9	27.5		200,446.9	22.5

a/ Acres of disturbance for range improvements were calculated using the following estimates:

	Short-term	Long-term
reservoir	3 acres each	3 acres each
spring development	.25 acres each	0 acres each
well	.25 acres each	.08 acres each
pipelines	1.25 acres/mile	0 acres/mile
fences	1.00 acres/mile	.06 acres/mile
troughs	.25 acres each	.25 acres each

Source: U.S. Department of Interior Division of Operations and Paradise-Denio Environmental Impact Statement Team, 1980.

CHAPTER 5
PUBLIC PARTICIPATION

CHAPTER 5

PUBLIC PARTICIPATION

HISTORY OF COORDINATION EFFORTS

Communication with public land users and other concerned people has been an integral part of the Environmental Impact Statement (EIS) process, and will continue to be important through the decision-making stage. Public participation--both formal and informal--is vital throughout the planning, decision and implementing processes.

Since the start of the Paradise-Denio (P-D) range survey in 1976, range users have been invited to learn about, participate in and contribute information to the planning system. At the start of the range survey in 1976 letters were sent to all P-D permittees, telling them about the survey, asking for their help because of their experience and knowledge of the area, and also informing them about the upcoming EIS. When the range survey was continued into the summer of 1978, informal contacts were made by the P-D resource specialists to again invite participation from the area's ranchers.

In October 1978 a statewide news release announced the due dates for several EISs, including P-D, and explained why the EISs were being written. A public meeting, attended by about 100 people, was held in February 1979 to explain the planning process and to discuss the need for and the avenues for public participation during each step of the planning and EIS processes. More than 400 people received letters about this meeting and news releases were sent to local, state and national media, as well as a notice to the *Federal Register*.

During 1978 and 1979 Winnemucca District personnel talked to (either in person or on the telephone) numerous public land users, as well as local, state and federal government representatives, about the P-D planning and EIS. Local contacts included civic groups, Humboldt County Commissioners, Humboldt County Planning Commission, local representatives of the Nevada State Departments of Wildlife and Highways and representatives of other federal agencies such as the Forest Service and the Geological Survey. State and national government agencies as well as special interest groups were also contacted. The need for public input--both facts and opinions--was stressed during these contacts.

In August 1979 each P-D grazing permittee was given, during a private meeting between the user and a Paradise-Denio representative, the range survey results and also an estimate of future AUM allocations on his allotment, based on the results of the range survey. Some ranchers returned with additional questions and/or information that conflicted with BLM records. All pertinent information was incorporated and used in subsequent planning.

Several organizations and agencies that were interested in the range survey and its effects were also told about survey results. These groups included, e.g., the Toiyabe National Forest, the Nevada Cattlemen's Association, the Nevada State Department of Wildlife and regional financial institutions.

CONSULTATION AND COORDINATION EFFORTS IN DEVELOPMENT OF THE PROPOSAL

The P-D area manager's recommendations for a land use plan (Management Framework Plan, Step II--MFP II) were announced in March of 1980.

A *Federal Register* notice, a news release and a mailing of more than 500 letters announced a public meeting in March at which the MFP II recommendations were discussed. About 20 people representing range users and special interest groups asked questions and volunteered comments. A total of about 100 people attended.

The scoping process for the EIS was also described at the March meeting and specific requests were made for comments about concerns and problems from public land users. A total of 23 comments were received and each one was considered seriously and then answered. These comments, letters and the BLM answers are included in the final scoping document (available at BLM's state office in Reno and at the Winnemucca District office).

The EIS scoping and MFP II briefings were also presented to the Humboldt County Commissioners, the Nevada State Clearinghouse group and representatives of the Nevada Congressional delegates during March 1980.

An MFP II brochure was sent to all persons, groups and government agencies who have indicated an interest in Winnemucca District resources. The brochure outlined the planning and EIS processes, listed the principal recommendations of the Paradise-Denio area manager, gave the names of District personnel to contact with comments and emphasized the need for public input. The acting district manager, the P-D area manager and the planning and environmental coordinator were available for one week in April. Four permittees came in to talk to the area manager during that week.

All P-D permittees were telephoned or written to when the MFP II recommendations were available and offered separate briefing sessions. About 90 percent of the permittees responded by July 1980.

In December 1979, the district economist asked each permittee for information about ranch economics and a meeting was held in Winnemucca to discuss methods and problems of economic analysis in the EIS. Arrangements were eventually made at the request of local ranchers and Humboldt County officials to have the Agricultural and Resource Economics Department of the University of Nevada, Reno, conduct an economic analysis. The results of this analysis, showing economic effects of the possible downward adjustments in AUMs on the area's economy, were presented at a public meeting in Winnemucca in March.

The EIS team sociologist conducted more than 45 in-depth interviews with ranchers and other persons who have concerns for land and resource values. Interview results were written for the EIS and sent to the ranchers interviewed for additional comments or changes.

INTERAGENCY CONTACTS

Professional contacts have been made and will continue to be made with the following agencies:

U.S. Fish and Wildlife, Nevada State Department of Wildlife, U.S. Geological Survey, U.S. Forest Service, U.S. Soil Conservation Service, Nevada State Historic Preservation Officer, Nevada State Department of Water Resources, various departments at the University of Nevada, Reno, and other BLM districts.

CONSULTATION AND COORDINATION IN REVIEWS OF THE EIS

Public comments continue to be vital to the planning and EIS processes, and will be welcomed before and after the final decisions are made in 1982. All comments received will be considered, even if letters are received after the EIS is published.

AVAILABILITY OF THE FINAL EIS

The final EIS was sent to all those who received the draft EIS and all who commented on the draft. Anyone else requesting a copy may receive one. A *Federal Register* notice and an area news release were also used to inform the public about the final EIS availability.

Copies of the final EIS are available at most public libraries in Nevada (including the University of Nevada at Reno and Las Vegas) and also at BLM District Offices in Nevada, at Susanville in California, and at Vail and Burns in Oregon.

AVAILABILITY OF THE DRAFT EIS

The draft EIS was sent to the following listed agencies, organizations, industries and all persons who indicated an interest. Those who responded with comments are indicated by asterisks. Anyone wishing a copy of the EIS could receive one by calling or writing the BLM Winnemucca District at 705 East Fourth Street, Winnemucca, Nevada 89445 (702-623-3676).

FEDERAL AGENCIES AND LEGISLATORS

Department of Agriculture
Agricultural Stabilization and Conservation Service*
Farmers Home Administration
Forest Service
Soil Conservation Service
Senator Howard Cannon
Department of Commerce
National Weather Service

Department of Defense
 Air Force
 Department of Energy
 Environmental Protection Agency*
 Department of the Interior
 Bureau of Environmental and Compliance Review
 Fish and Wildlife Service
 Geological Survey
 Heritage Conservation and Recreation Service*
 Bureau of Indian Affairs
 Bureau of Land Management - Washington
 Office; Nevada State Office; Susanville, California,
 District Office; Burns and Vale, Oregon,
 District Offices; Battle Mountain, Carson City,
 Elko, Ely and Las Vegas, Nevada, District Offices
 Bureau of Mines
 Water and Power Resources Service (now
 Bureau of Reclamation)
 Senator Paul Laxalt
 Congressman James Santini
 U.S. Advisory Council on Historic Preservation

STATE OF NEVADA

DEPARTMENTS/DIVISIONS/BUREAUS (THROUGH THE NEVADA STATE CLEARINGHOUSE)*

Agriculture
 Conservation and Natural Resources*
 Economic Development
 Energy
 Environmental Protection Service
 Forestry
 Highways
 Historic Preservation and Archeology*
 Human Resources
 Indian Commission
 Lands and Land Use Planning
 Mineral Resources
 Mines
 Museum
 Parks*
 Planning Coordinator
 Water Resources*
 Wildlife*

LEGISLATORS

Assemblyman Douglas R. Bremner
 Senator Carl F. Dodge
 Senator Eugene V. Echols
 Senator Norman D. Glaser
 Assemblyman Thomas J. Hickey
 Assemblyman John Marvel

ALSO

Legislative Counsel Bureau
 Library
 Office of the Governor
 Soil Conservation Districts
 University of Nevada, Reno
 Max C. Fleischmann College of Agriculture
 Nevada Archeological Survey
 Renewable Resources Center
 Desert Research Institute, Resources Center
 Department of Mining Engineering
 Plant, Soil and Water Resources
 Renewable Natural Resources
 Library
 Cooperative Extension Service
 Division of Animal Science
 Bureau of Business and Economic Research
 Division of Agricultural and Resource Economics
 University of Nevada, Las Vegas
 Library

STATEWIDE COMMITTEES AND GROUPS

Grazing Board
 League of Cities
 Multiple Use Advisory Council on Federal Lands for
 the Governor
 Predatory Animals and Rodent Control
 Sheep Commission

LOCAL GOVERNMENTS, LIBRARIES AND GROUPS

Carson City Library
 Churchill County Library
 Clark County
 Library
 Southern Nevada Museum
 Douglas County Library
 Elko County Library
 Esmeralda County Library
 Eureka County Library
 Humboldt County
 Commissioners
 Extension Agent
 Library
 Planning Commission
 Sheriff
 Superintendent of Schools
 Lander County
 Commissioners
 Library
 Planning Commission
 Lincoln County Library
 Lovelock, Mayor of

Lyon County Library
Mineral County Library
Nye County Library
Pershing County
Commissioners
Extension Agent
Library
Planning Commission
Sheriff
Storey County Library
Washoe County
County Manager
Library
Regional Planning Commission
White Pine County Library
Winnemucca, Mayor of

ORGANIZATIONS

American Fisheries Society
American Horse Protection Association
American Humane Association
Animal Protection Institute
Audubon Society
Ducks Unlimited - Reno
Exploration Geologists of Nevada
Foresta Institute
Ft. McDermitt Livestock Association
Friends of the Earth
Geological Society of Nevada
Humane Society of the United States
Humboldt County Cowbells
Humboldt County School Board
International Society for the Protection of Wild
Horses and Burros*
I.T.C. Executive Board
Lions Club
National Council of Public Land Users*
National Mustang Association
National Public Lands Task Force
National Rifle Association
National Wild Horse Association
National Wild Horse and Burro Forum
National Wildlife Federation
Natural Resources Defense Council*
Nevada Cattlemen's Association*
Nevada Farm Bureau Federation
Nevada Miners and Prospectors Association
Nevada Mining Association
Nevada Off-Road Vehicle Association
Nevada Outdoor Recreation Association
Nevada Wildlife Federation*
Nevada Woolgrower's Association
Northern Nevada Native Plant Society
Off-Road Enthusiasts
Oregon Environmental Council
Pacific Legal Foundation

Pennsylvania Cooperative Wildlife Research Unit
Pershing County Sportsmen Association
Public Lands Council
Reno Four Wheelers, Inc.
SAGE
Shoshone-Paiute Tribe
Sierra Club - Toiyabe Chapter*
Society for Range Management-Nevada
Soil Conservation Society of America
Summit Lake Paiute Tribe
Walker River Paiute Tribe
Western Resources
Wild Horse Organized Assistance*
Wildlife Management Institute
The Wildlife Society, Nevada Chapter*
Winnemucca Gem and Mineral Club

Individuals and industries who have requested that they receive EISs.

OTHERS WHO RESPONDED

Sierra Pacific Power Company*
Joseph Thackaberry*
Thomas Cavin*
Marjorie Sill*
Coordinated Research Management and Planning
#1*
Smith and Gamble *(2 letters)
Don Jones*
Nevada First Corporation*
James Linebaugh, UNR*
Robert McCandless*
Karen Hayes, Federal Regulation Review*
Agricultural Stabilization and Conservation Service
Committee - Winnemucca*
Advisory Council on Historic Preservation*

THE FOLLOWING RANGE USERS RESPONDED

Ninety-Six Ranch*
T Quarter Circle Ranches, Inc.*
Bill and Dale DeLong*
Glen Tipton, Frosty Tipton, Mitch Moiola*
Tim and Margarita DeLong*
Jo Christison, Pinson and Pettit Ranches*
Sammye Ugalde*
John and Judy DeLong*

PUBLIC REVIEW AND HEARINGS

About 300 copies of the Draft Environmental Impact Statement were sent out during the last week of February 1981 with accompanying letters noting the date, place and time of the public meet-

ings and the procedure for the public to submit comments. Also, about 300 letters with information about comments and public hearings were sent to interested persons. About 100 more EISs were distributed later in response to requests. The final date for comments to be received in order to be incorporated into the final EIS was given as April 7. A *Federal Register* notice of the release of the DEIS and all pertinent information about hearings and comments was printed on February 12, 1981, and a news release with the same information was sent to area newspapers early in March.

In March the Nevada Cattlemen's Association requested a 30-day extension to give its members more time to answer. This request was granted by BLM State Director Ed Spang so the final date for comments became May 7, 1981. News releases about this extension were sent to area newspapers the first week in April.

The first public meeting was on March 10 in Reno and was attended by 15 persons. Oral testimony was given by two persons and no written statements were submitted. The second public hearing in Winnemucca on March 11 had twenty-three attendees, six persons testifying (one spoke for two separate interest groups) and one written response.

Transcripts of these public meetings are available for inspection at the BLM District Office, 705 E. 4th

Street in Winnemucca; at the BLM Nevada State Office, 300 Booth Street in Reno; and at the BLM Office of Public Affairs, 18th and C Streets in Washington, D.C. Also, transcripts may be purchased from Bonanza Reporting, 1111 Forest, Reno, NV 89509.

INTRODUCTION TO RESPONSES

All written and oral comments have been read and evaluated by Winnemucca District and Nevada State Office resource specialists and planning personnel. Additions to or changes in the DEIS are noted in the ERRATA section of this document. Responses to questions and substantive comments were written by the various specialists and then reviewed by an interdisciplinary team for consistency and accuracy of the responses.

Three people presented oral comments but did not submit written statements. Other people who spoke at the meeting submitted written comments similar to their oral comments. Therefore, no responses to their oral comments were required.

A list of respondents to the DEIS and the comment areas given responses appears in Matrix 1.

Matrix 1
 Respondents to Paradise-Deno Draft Environmental
 Impact Statement and Areas of Concern

Comment
 Letter
 Index #

Agency, Organization or Individual

		Range Survey	Chapter I Alternatives	Climate	Soils	Water Resources	Vegetation	Wildlife	Aquatic Habitat	Wild Horses & Burros	Recreation	Economics, Social Profile
1	Sierra Pacific Power Company											
2	National Council of Public Land Users											
3	Advisory Council on Historic Preservation											
4	International Society fo the Protection of Mustangs & Burros											
5	Sierra Club - Toiyabe Chapter											
6	Nevada State Planning Coordinator											
7	Nevada State Department of Wildlife											
8	Nevada State Department of Conservation & Natural Resources											
9	Nevada State Division of Water Planning											
10	Nevada State Division of Historic Preservation & Archeology											
11	Nevada State Division of State Parks											
12	Bill and Dale DeLong											
13	U.S. Environmental Protection Agency, District IX											
14	USDA Agricultural Stabilization & Conservation Service Humboldt County Ascs Committee											
15	Nevada Wildlife Federation, Inc.											
16	Joseph J. Thackaberry											
17	Thomas A. Cavin											
18	Marjorie Sill											
19	CRMP Local #1 - Sammy Ugalde											
20	John and Judy DeLong											
21	Ninety-Six Ranch											
22	T Circle Ranches, Inc.											
23	Glen Tipton											
24	The Wildlife Society											
25	Tim and Margarita DeLong											
26	Smith and Gamble, Ltd.											
27	Don Jones											
28	Jo Christison											
29	Sammy Ugalda											
30	Natural Resources Defense Council, Inc.											
31	USDI Heritage Conservation & Recreation Service Pacific Southwest Region											
32	Wild Horse Organized Assistance, Inc.											
33	USDA Agricultural Stabilization & Conservation Service Reno, Nevada											
34	Nevada First Corporation											
35	American Horse Protection Association											
36	Smith and Gamble, Ltd.											
37	UNR, Cooperative Extension Service - James Linebaugh											
38	Nevada Legislature - Federal Requation Review Committee											
39	Nevada Cattlemen's Association											
40	W.W. Hall (written comment recieved at Winnemucca Public Hearing)											
T1	Robert Hagar, Nevada First Corporation (Reno Public Hearing)											
T2	Tina Nappe (Reno Public Hearing)											
T3	Lawrence Frenchy Montero (Winnemucca Public Hearing)											

Comment Letter 1

Sierra Pacific Power Company

MICHAEL P. SULLIVAN
Supervisor - Environmental Affairs

February 18, 1981

Mr. Edward Spang
State Director, Nevada BLM
P.O. Box 12000
Reno, Nevada 89520

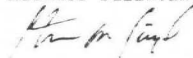
Dear Mr. Spang:

Sierra Pacific Power Company appreciates this opportunity to review the Paradise-Denio Draft Grazing Environmental Impact Statement. Your staff should be commended for producing a clear, easy to read document. The format follows a logical progression which facilitated the review. Charts, maps and other supplementation information added greatly to the description and evaluation of the proposal.

We find no conflicts between your proposed action and our plans for the areas mentioned in the grazing E.I.S. The report should prove to be a valuable tool in the preparation of our assessment reports.

Sincerely,

Michael Sullivan



Steven Siegel
Environmental Specialist

SS:bu

cc: Frank Shields, BLM
Winnemucca

P. O. BOX 10100/ RENO, NEVADA 89510/ TELEPHONE 702/789-4894



Comment Letter 2

National Council of Public Land Users

P. O. Box 811
Grand Junction, Colorado 81501

Paul Maxwell, President

5 Mar 81

Herbert Snyder, Secretary

Mr. James Watt, Secretary
United States Department of Interior
Washington, D.C. 20240

Dear Mr. Watt:

The Draft Environmental Impact Statement, Proposed Domestic Livestock Grazing Management Program for the Paradise-Denio Resource Area, Humboldt & Pershing Counties, Nevada, prepared by Department of Interior BLM, Winnemucca District, has been reviewed.

On Page 3-1 of the Proposed Action, Environmental Consequences, Introduction, it is stated, "Impacts concerning climate were analyzed and found to be insignificant. No further documentation of this component will appear in the EIS".

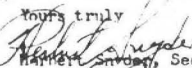
The significance of this statement is reflected in the content of the whole draft. It indicates a total lack of concern for the land and the watersheds in favor of the more influential "economic concern". It is a repetition of the long standing attitude that has made a desert of so much of the West. Domestic livestock grazing being the greatest hazard.

2-1

No amount of deceptive expertise will hide the fact that the relationship between natural precipitation and natural evaporation due to wind and sun determine a fragile DESERT environment, and the importance of mitigating natural vegetative cover.

That these factors are "dismissed" with the statement that "Impacts concerning climate were analyzed and found to be insignificant", clearly indicates the lack of qualifications on the part of those preparing the statement. It should be totally rejected until these important factors are included!

Please advise what you intend to do about it.

Yours truly

Herbert Snyder, Secretary

Copies to: Natural Resources Defense Council
Mr. E. F. Spang, Nevada State Director, BLM
EIS Team Leader, Winnemucca, NV 89445

PS: Where can a copy of the above mentioned "analysis" be obtained?

Response Letter 2

12

2-1 Issue: Desertification of Rangeland

The process of desertification was discussed among team members prior to and during preparation of the draft EIS. It was decided that this process could not be adequately analyzed because of a lack of research in general and the absence of specific information applicable to semiarid rangelands in the Great Basin. See discussion on CRMP in the beginning of the Summary in the FEIS.

Comment Letter 3

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

Reply to:

Lake Plaza South, Suite 616
44 Union Boulevard
Lakewood, CO 80228

March 11, 1981

Mr. Edward Spang
State Director
Nevada State Office
Bureau of Land Management
P. O. Box 12000
Reno, Nevada 89520

Dear Mr. Spang:

This is in response to your request of March 11, 1981, for comments on the draft environmental statement (DES) for the Paradise-Denio Grazing Statement, Winnemucca District, Nevada.

Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act of 1969, the Council has reviewed the Bureau's DES and has determined that there appears to be no reason for the Council to comment at this time.

Sincerely,

L. S. Wall

Acting
Louis S. Wall
Chief, Western Division
of Project Review

Comment Letter 4

INTERNATIONAL SOCIETY
FOR THE
PROTECTION OF MUSTANGS & BURROS

11790 Deodar Way Reno, Nevada 89506
Telephone: (702) 972-1989
FOUNDED IN 1960

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March 19, 1981

Frank C. Shields, District Manager,
Bureau of Land Management,
705 East Fourth Street,
Winnemucca, NV 89445

Dear Mr. Shields:

We thank you for letting us comment on the Paradise-Denio Grazing Impact Statement.

How can the bureau of Land Management best serve the complex of interest in well managed public lands? I believe that the Congress has already indicated how this question is answered. The concept of multiple use is firmly fixed in the Federal Land Policy and Management Act. It has been reinforced in the Public Rangelands Improvement Act. The public interest is best served by multiple use management of public resources through a decentralized management system based on clear Congressional policy guidance and with the active involvement of those affected.

Livestock grazing is only one component in a very complex resource management system. The BLM District Manager must determine the forage capacity of the range, he must also relate that capacity to the needs of wildlife, wild horses and burros, as well as to the needs of livestock.

Decisions about the management of public lands must be well documented and based on sound data. The BLM's objective is to improve the productivity of the public rangelands for the benefit of all users (livestock, wildlife, wild horses and burros, industry and recreation). Long-term benefits are of little value to marginal operations which may be seriously and immediately affected by needed short-term livestock cuts. The BLM should explore methods of analyzing different combinations of reductions in range improvements and should phase in reductions gradually and monitor the results intensively to determine more precisely how the individual range ecosystem respond to reductions.

It is our position that much more can be gained through a cooperative effort between the land management agency and all conservation organizations toward the restoration of the productivity of the public rangelands so than an equitable number of all creatures, including man, will be assured a sustenance in decades to come. The only way that can be accomplished is to recognize that all

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grazing pressures on our public lands must be controlled, including wild horses and burros and domestic livestock overuse and abuse. Abuses have been allowed to continue, particularly numbers of cattle far in excess of that for which a permit is issued.

Every effort should be made on trend studies and establishing trend study plots on each allotment over a reasonable period to get the actual trend. This would allow a concentration on allotments and result in reliable and supportable data upon which to base sound range management decisions.

The areas near water are heavily utilized and priority should be given to improvement of the land resource and further water developments made available for all grazing animals, especially away from the critical areas.

Certainly one of the most emotion-laden programs the BLM administers is the wild horse and burro program. It is popular to blame all the "ills" of the public land use upon the wild horses and burros, but other than density areas, past abuses cannot be solely contributed to wild horse and burro exclusively. Considering the serious condition of the range, and the big hurry to remove the horses, we have asked, time and time again, that proportionate reductions be made in domestic livestock use, since removal of horses and burros alone will have little effect on reducing grazing pressure to the extent desirable.

There is no way to make a proper evaluation of how well the total multiple use plan for an area is working until all uses are at planned levels. This applies especially to wild horses, burros and livestock.

The International Society for the Protection of Mustangs and Burros (ISPMB) and the Multiple Use Advisory Council for Winnemucca district supports in concept the retention of approximately 700 wild horses and burros in the Paradise-Denio Unit; 250 horses will be in the Owyhee area and 50 in the Snowstorm area. Where the AMP can be adequately designed, wild horses and burros in viable herds will be retained throughout the district.

For the safety and welfare of the horses in trespass on private lands, we do not oppose their removal. The law requests BLM to remove horses and burros that stray onto private lands (adjacent to public land in a checkerboard fashion) when they are requested to do so by private landowners.

It is our position that healthy, viable wild horse and burro herds remain on the public domain. Wild Horses and burros deemed to exceed the level which will maintain a natural ecological balance with existing forage and other uses of the public lands should be removed humanely, and be put up for adoption.

As the excess wild horses and burros are removed to planned population levels the next important step will be a management plan tailored to each herd. There is a need to understand the effect as sex ratios, age structure, etc. as related to management to greater extent than we presently do. A viable herd should not be tied to the number of horses (some BLM figures claim 125 head), but instead an animal population must embody a certain amount of genetic diversity in order to be able to adapt to marked environmental changes and survive. Horses for each herd should be selected for quality which would eliminate deformed or extremely poor conformation horses.

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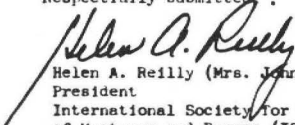
The Committee on Wild and Free-Roaming Horses and Burros appointed by the National Academy of Science at the direction of Congress to report on the state of knowledge on wild horses made its final report last month. The committee specified that wild horse herds be individually managed at a level that insures sufficient genetic probability.

There is still a long way to go and changes are slow in coming. We believe that solutions now being sought in our efforts to bring about lasting protection for our wild horses and burros with emphasis on good management and control program, whereby, they will be protected once and for all, and their numbers controlled wisely and humanely for their future welfare, can be put into effect on other than a biased basis.

We continue to ask the Bureau of Land Management to strive to handle all aspects of the wild horse and burro program humanely, diligently and efficiently. BLM should continue to seek to balance the competing uses of the rangeland resource for wild horses and burros, wildlife and for the domestic livestock use. For this balance to be achieved, wild horses and burros, as well as other grazing animals, must be managed in a way which respects the carrying capacity of the range habitat ... the land, forage and water they have to share.

We thank you for letting us express our views.

Respectfully submitted,


Helen A. Reilly (Mrs. John W.)
President
International Society for the Protection
of Mustangs and Burros (ISPMB)

Response Letter 4

1-4 Issue: Management Implementation

See discussion on CMP at the beginning of the Summary in the FEIS.

Comment Letter 5



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California
P.O. Box 8096 - University Station - Reno, Nevada 89507

March 27, 1981

Frank Shields, Manager
BLM/Winnemucca District
705 E. 4th St.
Winnemucca, NV 89445

Dear Manager Shields,

The Great Basin Group of the Toiyabe Chapter of the Sierra Club submits the following comments on the draft grazing Environmental Impact Statement on the Paradise-Denio Resource Area.

Although several improvements over previous EIS efforts by BLM are made successfully by the P-D DEIS, the range of alternatives remains very poor and inadequate. Also, the BLM proposed action appear to be a shocking abnegation by BLM of its responsibility to manage the public lands for all Americans under the principle of multiple use, and, instead, is a dominant use plan. Our detailed comments follow:

Summary Table 1. The idea of the summary comparison of significant impacts of various alternatives is a good one and well done at the beginning of the DEIS. For those who cannot or lack the time to read the entire DEIS as well as for those who can use the summary to identify areas to be more carefully checked in later chapters, the summary tables are invaluable.

5-1 | The actual summary comparisons are scandalous as the reviewer reads of the significant adverse impacts of every alternative, including BLM's proposed action. Why is there not an alternative considered which will have beneficial impacts on the environment, especially on critical wildlife habitat and currently degraded riparian areas? Why does BLM propose an action that
5-2 | opts to increase livestock forage by 86% while only improving range condition by 13%?

5-3 | The apparent reduction of 730 deer has been explained verbally to us by BLM staff as a "computer problem," yet no such explanation is offered in the DEIS. Corrections should be made in all the tables and chapters falsely reporting the 730 deer decline. We wonder if the "computer problem" also impacts the forage levels for livestock, bighorn sheep, antelope, and wild horses? The FEIS should clearly address the "computer problem."

To explore, enjoy, and protect the natural mountain scene

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While we support some reductions in wild horse numbers, we consider the 650% reduction as well as the 8% death loss, loss of some traits and changes in herd viability as well as the inhumane confinement of wild and free roaming horses into one area excessively detrimental to this public land resource.

5-4 | The recreation summary is poor, as wildlife numbers have not met demand for some time. The impacts of the various alternatives should be separated out from the general inadequacy of game species to meet "demand."

The Sierra Club is neither a "wildlife" nor a "protectionist" group. While we share many of the same concerns with wildlife and wild horse groups, our concerns are not totally identical and should not be presented as such as implied in Summary Table I.

5-5 | Summary Figure 1. It is unreasonable that wildlife and wildhorse numbers would not increase significantly both in the No Livestock Alternative and in the Livestock Reduction/Maximize Wild Horse and Burro Alternative. Yet no explanation is given of the lack of population increases in this bar graph. If there is some sort of reasoning behind these illogical conclusions, the bar graph should be footnoted appropriately.

5-6 | Summary Table III. It is quite awkward to exclude 12 allotments from the DEIS because they are administered by another BLM district. The reviewer never knows if disparities in acreage or AUM totals are due to BLM analysis deficiencies or to this exclusion. The FEIS should list the excluded allotments, depict them on the RA map, and be very clear when the 126,368 acres are included or excluded from the totals.

5-7 | Also, a footnote should be added to explain why acreages are excluded from livestock grazing in alternatives other than the No Livestock Grazing Alternative, as well as which allotments are involved. While I know that some exclusions are due to the proposed wild horse area, I don't know about other exclusions.

Summary Figure 2. The time frame estimation is excellent. We just wonder whether BLM will be able to stick to it - but that's another issue!

Chapter 1. Proposed Action. There are parts of the proposed action which seem very responsible and long overdue for the agency charged with managing our public lands to propose. We support the proposed seasons-of-use as most public land interest groups recognize the damage being done to the public rangelands by too-early and by season-long grazing. Some flexibility should be built into the system to allow earlier and later turn-out dates depending on annual variations in the climate. The proposed grazing treatments appear quite comprehensive and a good guide to the development and/or revision of specific Allotment Management Plans. The need for the proposed grazing systems is also very acute as current deficiencies in range management are succinctly summarized on p.1.11. Major problems

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include "the overobligation of available vegetation, pastures of unequal carrying capacity, uneven livestock distribution, inadequate project maintenance and lack of range supervision and studies."

Livestock Support Facilities. However, we are very concerned about the proposed livestock support facilities for several reasons. 1) The cost, \$9,000,928, appears outrageously high in these times of tightening budgets. If livestock AUMs increase by 88,994 as projected by the proposed action, each additional AUM would cost \$101.14. Another way of looking at it would be to divide the \$9 million by the 67 permittees. BLM proposes to spend at least \$134,343 per permittee!!! Perhaps it would be cheaper in the long run to buy marginal operations outright than to subsidize them indefinitely. The DEIS fails to show the benefits the public would receive by subsidizing the livestock industry, but does clearly show the significant negative impacts of the facilities on other resources, such as water quality, wildlife habitat, cultural resources, soil stability, etc. 2) The proposed facilities appear to be a violation of the public land management principle of multiple use, as footnote a of Table 1-5 states "These livestock support facilities benefit livestock only and do not reflect additional projects for wild horses or big game." These "additional projects" discussed on p.1.13 will cost only \$72,500 or .8% of the cost of the "livestock-only" facilities. 3) The \$9 million cost may be misleading as footnote c of Table 1-5 states "The costs were developed at 1980 prices and do not include future maintenance and replacement costs." From the DEIS, we have no idea whether the proposed facilities will cost another \$9 million to maintain and replace over the long-run (to 2024) or less than that. We do not have sufficient information to be able to support any expenditure for livestock support facilities.

General Implementation Schedule. We would like to suggest another project to improve wildlife and wild horse management, in addition to removing or modifying fences. We recommend that cattle guards also be modified to prevent the cruel and sometimes fatal entrapment of wildlife and wild horses.

No Livestock Grazing Alternative. It is always curious for us to read that the no livestock grazing has more beneficial impacts on the public lands than BLM's proposed action which invariably include millions of dollars for range "improvements." Would the lands be better off without livestock grazing? Will livestock grazing always degrade the rangelands or can livestock grazing be compatible with decent wildlife habitat, excellent riparian condition, good range condition, etc.?!?

Table 1-6. Footnote a lists the criteria on which priorities for developing AMPs were established. But it is not clear how the criteria were used. Is Jackson Mountain-Desert Valley-Blue Mountain with #1 priority the worst area - in greatest need of AMP development? Please specify, if not in the FEIS, then directly to me as I am very curious as to why certain allotments are getting first crack at \$9 million of public funds.

5-8

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5-10

5-11

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5-12 | Table 1-8. Where are wildlife funds coming from? Why weren't these costs included in Table 1-5?

No Action Alternative. The analysis of the impacts of this alternative show the accelerated deterioration of the public rangelands should no new action be taken. We fear, however, that unless all public land interests work out our differences, that this alternative, with all its negative impacts on all the resources, will be the one chosen and implemented by default.

Maximizing Livestock Alternative. I cannot find a significant difference between this alternative and the proposed action, with the exception of more area to receive vegetation manipulation. Otherwise, the stocking rate, the condition class changes, every other type of range improvement and all the adverse impacts are the same. We feel that this alternative is as unacceptable in its disregard for multiple use and its excessive, exclusive subsidies for the livestock industry as the proposed action.

Livestock Reduction/Maximizing Wild Horses and Burros Alternative This alternative is too ridiculous to comment on, as no one has ever supported it to our knowledge. And if someone did, reducing wild horses and burro populations by 650% is hardly what most people would recognize as "maximizing" them. Most wild horse groups and all conservation groups support reducing both livestock and wild horses to the carrying capacity of the public rangelands.

Standard Operating Procedures. We have no objections to these SOP. We only wonder whether BLM will have the intestinal fortitude and financial resources to followthrough on them.

5-13 | Management Supervision Procedures. We understand that MSP is not monitoring. Why isn't monitoring mentioned in the DEIS? Is it not an integral part of all grazing systems, seasons of use, stocking rate decisions, professional range management? Also, why wasn't trespassing mentioned in the DEIS? Is trespassing illegally using a significant amount of AUMs in the P-D Resource Area?

5-14

Chapter 2. The discussion of the affected environment is good, possibly the strength of this EIS. The importance of the riparian vegetation is properly recognized. Riparian vegetation only amounts to 3,694 acres due to the scarcity of water in the P-D resource area. It is of special importance because it furnishes forage and cover for wildlife and livestock and acts as a soil stabilizer and watershed protector. Yet a large percentage of the riparian area is in a deteriorated condition because of overgrazing by livestock. We feel the DEIS is inadequate in not dealing with this problem. We also feel that BLM is in direct violation of its own regulations (BLM Manual 6740 Wetland-Riparian Area Protection and Management) in proposing actions which will further degrade already deteriorated riparian areas.

5-15

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The range condition of the P-D resource area is extremely objectionable. 84% of the 3,702,186 acres is in poor condition. We should all be ashamed of these statistics which reflect on us as poor stewards of the land. Our efforts should be directed at reversing the deterioration of the land resource, not at spending \$9 million to increase forage for livestock!

The discussion on wildlife is very good, except for the omission of any information on non-game species. We sincerely hope that the last of the "wild-cow" operations will be seen shortly as these types of irresponsible uses are ruining the public land for all of us. It is hard for us to believe that BLM would have knowingly published false information on mule deer numbers. The 730 deer "lost in the computer" should be found and restored to the range!

- 5-16 The economic section is technically bankrupt. Assumptions used are ridiculous, logic is laughable. Nowhere could we find the amount of public subsidies to the livestock industry included in the analysis, although the proposed \$9 (or \$13) million in range improvements is not negligible to the P-D resource area, much less previous public subsidies for livestock operators over the years. And where is calculated the increase in "rancher wealth" of 88,994 AUMs? At \$50/AUM, at least \$4,449,700 should be generated by the proposed action and much more by the maximizing livestock alternative. If all types of ranch operations are as unprofitable as the DEIS analysis says, does this imply that vast public subsidies are needed to pump up a marginal industry? Don't these federal subsidies contradict the free enterprise system?
- 5-17
- 5-18

Social Profile. We find it very strange that the permittees, the proposed recipients of millions of dollars of federal funds, are complaining so bitterly about current BLM efforts to manage the public lands. We wonder if their position should be summed up as: SUBSIDIES WITHOUT REGULATIONS! We wonder if the permittees want to be good stewards of the public lands, sharing the lands with all the other users?

Regional attitudes. The Sierra Club has a membership of over 200,000 people. Official conservation policies which apply to the P-D resource area reflect the values and concerns of many more than the 1,400 people reported on p.2-36.

- 5-19 Chapter 3. The role of CRMP is very ambiguous. Is CRMP going to be used to influence BLM decisions or to implement BLM decisions? What is BLM doing to guarantee that all public land interest groups are represented in CRMP? Is BLM going to substitute the votes of a stacked committee for the professional judgement of its own staff?

Thresholds. The use of thresholds is apparently an improvement over "opinions" of specialists. However, the public did not have an opportunity to set the thresholds, nor is there enough information provided in the DEIS to justify specific thresholds.

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Overall, Chapter 3 is poor. Reasoning is superficial. Conclusions do not seem to reflect the significance of adverse impacts of different alternatives.

- 5-20 The discussion on p.3-13 regarding productivity is confusing. Is low productivity intrinsic to a site or is it caused by overgrazing and subsequent deterioration of a more productive site? Will not some sites always be "non-productive" to cattle, although near top ecological productivity? It appears that the proposed action attempts to increase forage production at the expense of improving poor range condition.

- 5-21 On p.3-14, the statement, "A decrease of six percent in the amount of sagebrush is not considered significant..." depends on the location of the brush removal. If a sagebrush removal occurs in a critical deer or antelope area, its loss would be quite significant. We totally oppose sagebrush control projects on Pauite Meadows, Pine Forest, Happy Creek, and Double H allotments due to the significant adverse effects on critical wildlife winter ranges.

Index. This innovation, although simple, is very welcome to EIS reviewers.

In conclusion, we feel that the DEIS does not adequately reflect the concerns expressed in our comments on MFP-II and the P-D scoping. We find it totally unacceptable that BLM proposes alternatives that would have so many significant adverse impacts on the environment and on other resources of the public lands, including critical riparian areas, while at the same time proposes to spend over \$9 million exclusively to increase forage for increased livestock production. We believe such alternatives are in direct violation of BLM's own regulations. We are unable to support any of the P-D alternatives and instead propose one for inclusion in the FEIS. We call our alternative, the Land Resource Maximizing Alternative. While we realize that time limits are short, we feel that your office can analyze our alternative with existing information. Therefore, we submit the following alternative as previously discussed with you and your staff and with Ed Spang, Nevada State Director.

- 5-22 The Land Resource Maximizing Alternative should include the following components:

- 5-23
- 1) Protection of the major fisheries in the P-D resource area. 20 are identified in the DEIS. Such protection would reverse the violation of BLM regulations by the proposed action which would continue to degrade deteriorated riparian areas.
 - 2) Inventory of all other riparian areas and development of management plans or another standard operating procedure to protect all riparian areas.
 - 3) Any proposed range improvement should be balanced between livestock and wild horses and wildlife.
 - 4) Protection and enhancement of critical wildlife habitat, including winter ranges, strutting and nesting areas, etc.
 - 5) Reduction of wild horses to an optimal level in each allotment in which they currently roam.
- 5-24
- 5-25
- 5-26

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- 5-27 6) Development of management supervision procedures to reduce grazing pressures on lands which are unsuitable for grazing; i.e. lands which are easily erodable due to steepness, dryness, or lack of sufficient cover.
- 5-28 7) In all allotments in poor condition, utilization of less than 50% forage in order to leave sufficient forage after grazing to protect the soil, to reduce evaporation, to increase infiltration of water, and to encourage ample root reserves.
- 8) Development of range support facilities that are as simple as possible, easy to operate, and inexpensive to maintain which will not lock the range into a level of production sustainable only by artificial means and periodic treatments, at increasing costs. Any range improvements will either benefit other resource users or offer minimal interference or adverse impacts to such uses. Where reseeding is required, native species will be used if at all feasible. Fire is an acceptable method of removing brush provided wildlife habitat needs and watershed protection are given adequate consideration in the operation. Vegetation manipulation will not utilize chemical pesticides indiscriminately and will not be used unless no other method is feasible.
- 5-29 9) Establishment of season-of-use and grazing systems which will substantially improve range conditions as well as increase forage production.
- 5-30 10) Development of a forage allocation plan which will immediately reduce livestock and wild horse numbers to the current carrying capacity of the land resource. Increased forage production will be equitably shared among wildlife, wild horses, and livestock.
- 5-31 11) Immediate establishment of an effective monitoring program to follow range trend, changes in forage production, etc.
- 12) Establishment of priorities to take measures first where the greatest correctible damage is occurring.

A separate alternative is necessary as the four alternatives in the DEIS inadequately deal with the following:

- 5-32 a) there are no cost estimates for protecting riparian areas by fencing. However, the Winnemucca District staff knows general costs of fencing and specific riparian areas. Therefore, developing minimum costs should not be that time-consuming.
- 5-33 b) there are very few actions proposed for the protection and enhancement of wildlife habitat and for wild horse management. One-half of the proposed \$9 million would be acceptable!
- 5-34 c) although areas unsuitable for grazing have been identified, no plans to develop management and supervision measures or the costs thereof were proposed in the four alternatives.
- 5-35 d) the changes in forage allocation and range condition by restricting grazing below 50% utilization have not been addressed.

We have spent considerable time and effort in reviewing the DEIS, preparing our comments, and developing a land resource maximizing alternative for the Paradise-Deno resource area. We recognize

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that your staff has also expended an immense amount of effort in developing the DEIS. We sincerely hope that all our efforts are not in vain and will result in public land management of which we can all be proud.

Thank you for considering our concerns.

Sincerely,



Rose Strickland
Public Lands Committee
Great Basin Group of the Toiyabe Chapter of the Sierra Club

1685 Kings Row
Reno, NV 89503
(702) 747-4237

Response Letter 5

5-1 Issue: Adverse Impacts to the Environment

In Summary Table 1 on FEIS page iv, and in the text on page 3-55 the DEIS demonstrated beneficial impacts to both riparian areas and wildlife habitat, respectively. These are impacts predicted from the No Livestock Grazing Alternative.

5-2 Issue: Relationship Between Vegetation Condition and Vegetation Production

The 13 percent increase in livestock forage condition in reality affects 26 percent of the EIS area. These lands are also the most productive in the area and as such are capable of vast increases in forage production.

5-3 Issue: Mule Deer Numbers

See response to Issues 7-5 and 7-10.

5-4 Issue: Threshold for Recreation Impacts

The threshold level for significance of impact was derived from the Nevada State Comprehensive Outdoor Recreation Plan (NSCORP). If the estimated demand which was derived from NSCORP figures exceeds the number of hunter days available from wildlife levels, then the impact is considered to be adverse. Likewise, if wildlife levels satisfy demand then the impact is beneficial. Threshold levels are developed by the individual specialist and are only used for the purpose of this analysis.

5-5 Issue: Increases in Wildlife, Wild Horse and Burro Numbers

Summary Figure I does not refer to changes in numbers of wildlife or wild horse and burros. This figure reflects the number of AUMs of available vegetation proposed for allocation under the alternatives including the proposed action. Under these proposals, wildlife would be allocated available vegetation with an objective to reach reasonable numbers, as developed cooperatively by the Nevada Department of Wildlife and the Bureau of Land Management. Population increases of wild horse and burros would only be limited by the amount of available vegetation present within the herd management and herd use areas. Increases in wildlife, wild horse and burros numbers were shown for analysis purposes. Actually adjustments would take place through the CRMP process (see discussion on CRMP in the beginning of the Summary in the Final EIS.)

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5-6 Issue: Acreage Figures

The 126,368 acres of public land in 12 allotments which are administered by other BLM districts and/or states were always included in acreage totals, unless otherwise stated.

5-7 Issue: Exclusion of Allotments from Livestock Grazing

There are three reasons why livestock might not occur on an allotment. They are:

1. There is no available vegetation,
2. It is a wild horse herd use or management area,
3. In the case of the Old Gunnery Range there is no grazing at present and future allocation would be difficult unless a management agreement could be made with the affected range users.

Two methods were used to demonstrate allotments with no livestock grazing. The first was the indication of "No Livestock Grazing" in the far right column of the allocation tables in the DEIS. The second was the indication of "0" in the livestock allocation or use column of these tables.

5-8 Issue: Proposed Range Improvement

See Errata - Chapter 1, corrections to Tables 1-5, 1-17, and 1-20 Footnote 'a'.

5-9 Issue: Modification of Cattleguards

The modification of cattleguards to avoid entrapment of wild horses has been a district policy since 1975. Cattleguards installed since this date have been modified prior to installation. Many cattleguards installed prior to this date have also received this modification. To date, no problem has been identified in this district regarding the entrapment of big game species in cattleguards.

5-10 Issue: Livestock Grazing Compatibility

Livestock grazing can indeed be compatible with other resource values. Compatibility, however, does not imply mutually beneficial co-existence. Trade-offs often exist between resource values, and balances must be struck. This is not to say that conflicts may not exist. For instance, livestock grazing may not be compatible with riparian zone protection.

5-11 Issue: Allotment Management Plan (AMP) Implementation

AMP implementation priorities were established during the Management Framework Plan Step 2 conflict analysis process, using the criteria stated in footnote 'a' of Table 1-6 of the DEIS. The priorities were made for the analysis in the EIS analysis and will be reevaluated through CRMP. See discussion of CRMP at the beginning of the Summary in the FEIS.

5-12 Issue: Wildlife Management Costs

The purpose of Table 1-5 was to display in tabular form those facilities that would be required to support the livestock grazing program under the Proposed Action. Table 1-8 reflects fences which inhibit wildlife movements from one area to another, and would be modified under this proposal for mitigation. Costs of these modifications are referred to in the narrative, "General Implementation Schedule," DEIS page 1-13, last paragraph. Also see response to Issue 11-4.

5-13 Issue: Monitoring

Monitoring is mentioned several times in the DEIS. A few examples are on page iii, 1-2 and 3-2. For a more detailed explanation of monitoring, see the discussion of CRMP at the beginning of the Summary in the FEIS.

5-14 Issue: Discussion of Trespass

Last three-year-average documented trespass was demonstrated on Table 1-14 on page 1-23 of the DEIS. Documented trespass uses less than one percent of the total available vegetation and is considered to be insignificant for analysis purposes.

5-15 Issue: Protection of Riparian Habitat

The protection of each stream and riparian zone will require a different combination of protective measures. The broad nature of the alternatives, including the proposed action, precluded any commitment to any particular set of protective measures for any particular stream. An objective to improve and maintain the condition of riparian and stream habitat was established in the Management Framework Plan. Protective measures needed to improve the conditions of public streams will be included in the development of each coordinated resource management plan. See discussion on CRMP at the beginning of the Summary in the FEIS.

5-16 Issue: Method of Economic Analysis

The economic analysis of the livestock sector of the Paradise-Denio Resource Area is based on linear programming models constructed by the Division of Agricultural and Resource Economics at the University of Nevada, Reno, for use in a study entitled Economic Impact of BLM Grazing Allotment Reductions on Humboldt County (Torrell et al. 1980). The linear programming models were built from ranch budgets representing typical ranches in the EIS area. Secondary impacts to the county economy were analyzed using multipliers and coefficients from an input-output model prepared for a study entitled: The Economy of Humboldt and Lander Counties: A Working Model for Evaluating Economic Change (Fillo et al. 1977). Input-output models are useful for analyzing changes in the sectors of an economy resulting from direct impacts on one specific sector. Both linear programming and input-output modeling represent commonly accepted and current state-of-the-art techniques for preparing economic analysis.

5-17 Issue: Rancher Wealth

Rancher wealth impacts are analyzed in terms of existing conditions. Active preference, the number of AUMs a permittee could license each year if he were to activate his entire authorization, is the level from which rancher wealth impacts are calculated. Active preference in the resource area is 225,857 AUMs. Initially the proposed action would reduce the number of AUMs available to permittees to 101,689 AUMs, a reduction from active preference of 124,168 AUMs. At an average value of \$50 per AUM, the proposed action would initially reduce rancher wealth by approximately \$6.2 million. In the long term the proposed action would allocate 190,683 AUMs to livestock. While this allocation represents a substantial increase from the initial allocation it continues to represent a reduction of 35,174 AUMs from the existing level. This level continues to impose a reduction in rancher wealth of approximately \$1.7 million.

The long-term allocation of AUMs to livestock in the maximizing livestock alternative is 228,092 AUMs. This allocation is an increase of 2,235 AUMs above the existing authorization. It would increase rancher wealth by approximately \$112,000.

5-18 Issue: Ranch Budgets

The ranch budgets used in the economic analysis take into account both cash and noncash costs. The noncash cost category includes charges for items such as the labor of the operator and his family and an opportunity cost involved in his investment in equipment, buildings and livestock. If cash costs only are considered the ranch budgets indicate that ranches in the EIS area earn a net return above cash costs. This return, while small, when combined with other aspects of ranch life (see Social Profile DEIS Chapter 2) provides an acceptable level of return for ranch proprietors.

Response Letter 5

5-19 Issue: Role of CRMP

See discussion on CRMP at the beginning of the Summary in the Final EIS.

5-20 Issue: Vegetation Productivity

Low productivity may be intrinsic to a site or may be a result of any number or combination of factors, including over-grazing of a more productive site. Some sites may indeed be forever non-productive for livestock grazing, though near top ecological condition.

It should be noted that "condition" in the Paradise-Denio DEIS refers to livestock forage condition. Livestock forage condition is determined by interpreting the ability of vegetation, in both quality and quantity, to provide sustained livestock forage and soil stability. It cannot necessarily be used to determine ecological range condition, which is the present state of vegetation of a range site in relation to the climax plant community which could be expected for that site. (See also response to Issue 5-2.)

5-21 Issue: Removal of Sagebrush

The reference made that "... a decrease of six percent in the amount of sagebrush is not significant. ..." was expressed in terms of the relationship between the cumulative size of the areas treated and the total area occupied by sagebrush, not in terms of the effects on wildlife. Impacts to wildlife anticipated from vegetation manipulation projects are analyzed in the Wildlife section of Chapter 3 of the DEIS.

5-22 Issue: Need to Consider Alternatives

There are many alternatives that could have been considered in the DEIS, but not all possibilities were included. The District Manager will decide which alternative or combination of alternatives will be selected for the Paradise-Denio Resource Area. The Bureau's preferred alternative does not necessarily have to be selected. All or portions of any analyzed alternative may be used within the range of these alternatives. Within this framework a broad range of impacts were identified. See discussion on CRMP in the beginning of the Summary in the FEIS.

Response Letter 5

5-23 Issue: Protection of Riparian Habitat

See response to Issue 5-15.

5-24 Issue: Proposed Range Improvements

See Errata - Chapter 1, corrections to Tables 1-5, 1-17 and 1-20 Footnote 'a'.

5-25 Issue: Protection of Critical Wildlife Habitat

See discussion of CRMP in the beginning of the Summary in the FEIS.

5-26 Issue: Optimal Number of Wild Horses

"Optimal", as stated, is taken to mean maximum. In the No Livestock Grazing and Livestock Reduction/Maximizing Wild Horse and Burro Alternative, maximum allowable numbers of wild horses were analyzed.

5-27 Issue: Suitability of Rangeland

Suitability criteria were applied to acreages analyzed in the DEIS. For an explanation of these criteria see Appendix A, Section 3 of the DEIS page 6-6.

5-28 Issue: Forage Utilization

A 50 percent or less proper use factor was applied to key management species in the DEIS. See DEIS Table 1-4 for a breakdown of utilization levels of key management species.

5-29 Issue: Season-of-Use and Grazing Systems

Seasons-of-use (period-of-use in the DEIS) were proposed on all allotments (see Table 1-1 in the DEIS). Grazing systems and their objectives were discussed on page 1-11 of the DEIS.

5-30 Issue: Allocation Plan

In all alternatives, except No Action, allocation never exceeded the carrying capacity stated in the DEIS.

Response Letter 5

5-31 Issue: Monitoring and Implementation

See discussion of CRMP in the beginning of the Summary in the FEIS.

5-32 Issue: Cost of Protecting Riparian Habitat

Cost estimates are difficult to make unless the locations, methods and objectives of riparian habitat protection have been identified. These areas will be thoroughly analyzed and addressed during the actual planning phase. See discussion of CRMP in the beginning of the Summary of the FEIS. Also, see response to Issue 5-15.

5-33 Issue: Range Improvements

See Errata - Chapter 1, change of Footnote 'a' in Tables 1-5, 1-17, and 1-20.

5-34 Issue: Unsuitable Areas

Proposed management actions were applied to potentially suitable areas to make them suitable (see Appendix A, Section 1, DEIS, page 6-1 for examples). Cost of support facilities (e.g., water development) necessary to improve potentially suitable land to land suitable for grazing were included in Tables 1-5, 1-17 and 1-20 of the DEIS. For management cost see response to Issue 11-4.

5-35 Issue: Forage Utilization

See response to Issue 5-28

Comment Letter 6

March 24, 1981

Bureau of Land Management
Mr. E.F. Spang
Director
300 Booth Street
P.O. Box 12000
Reno, NV 89520

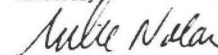
RE: SAI NV #81300028 Project: Paradise Denio Grazing

Dear Mr. Spang:

Attached are the comments from the following affected State Agencies: Divisions of State Lands, Conservation Districts, Water Planning, State Parks, Historic Preservation & Archeology, Environmental Protection, Water Resources and Wildlife concerning the above referenced project.

These comments constitute the State Clearinghouse review of this proposal. Please address these comments in the final or summary report.

Sincerely,



Mike Nolan for
Robert Hill
State Planning Coordinator

RH/MN/jg
Enclosure

Comment Letter 6

STATE CLEARINGHOUSE COMMENTS ON SAI NV #81300028

Paradise Denio Grazing EIS

Division of State Lands

While the Division of State Lands has no direct comment to the DEIS, we feel compelled to state our dislike of the way the public hearing in Reno on March 10th was conducted.

With no preliminary resume' of proposed action or alternatives the impression left with the public was "get this over as soon as possible with as little input as possible."

Division of Environmental Protection

We support management alternatives to use best management practices in upgrading the rangeland and water resources while maximizing the use of area by the ranchers and the public.

Division of Water Resources

Any diversion and beneficial use of the public waters for the Paradise-Denio grazing management plan must be in compliance with the provisions of Chapters 533 and 534 of the Nevada Revised Statutes. The State of Nevada retains jurisdiction over the public waters at all times.

Department of Wildlife

See attached comments.

Division of Conservation Districts

See attached comments.

Division of Water Planning

See attached comments.

Division of Historic Preservation & Archeology

See attached comments.

Division of State Parks

See attached comments.

Comment Letter 7



JOSEPH C. GREENLEY
DIRECTOR

ROBERT LIST
GOVERNOR

1100 VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89520

TELEPHONE (702) 784-6214

March 23, 1981

Mr. Mike Nolan
State Clearinghouse
Office of the State Planning Coordinator
Capitol Complex
Carson City, NV 89710

Dear Mike:

The Nevada Department of Wildlife appreciates the opportunity to review and provide comments on the Paradise-Denio Grazing Environmental Impact Statement, SAI NV # 81300028.

General Comments

We find this EIS to be generally acceptable in format, organization, objectivity and coverage of significant issues. There are, however, some serious omissions concerning wildlife resources which will be addressed in further detail in this response. Unless otherwise noted, the comments herein are directed to the proposed action and its predicted environmental consequences. We have not addressed the alternatives in any detail because we consider them to be either less desirable than the proposed action, or unrealistic or both.

We consider the fact that chukar partridge are not even mentioned in the DEIS to be a serious flaw in this document. The Paradise and Denio Planning Units encompass the most extensive area of high quality chukar habitat and high density chukar populations to be found in Nevada. In fact, the area under consideration may well be the heart of the best chukar habitat in North America. It is also one of the most popular chukar hunting areas in the state, supporting on an annual basis 2,000-3,000 hunters and providing 9,000-10,000 hunter days of recreation.

The only conceivable reason that we can see for the BLM not addressing this very important species is that they considered the impacts from the proposed action to be negligible. We do not agree that this is the case; but even if it were so, a species of such stature should be covered with a conclusion of no significant impact. In our judgement, chukar partridge may be significantly impacted by the proposed action, especially from some of the proposed sagebrush spray projects. An example is the Double E Mountains which is top quality chukar habitat with high density populations.

7-1

Comment Letter 7

Mr. Mike Nolan
March 23, 1981
Page 2

7-1 A significant reduction of brush cover resulting from extensive herbicide application would certainly reduce chukar habitat quality and carrying capacity resulting in a significant deleterious impact to this species. We feel that it is imperative for this serious deficiency (omission of chukar partridge from the impact analysis) be corrected in the final EIS.

7-2 This same situation applies to several other significant species which occur within the planning units including cottontail rabbits and bobcats. These are both highly valued species from several perspectives, particularly human use demand; and therefore, they should be addressed.

7-3 Another area of major concern is that no impact assessment or management strategies are provided for important mountain brush species, except aspen. Such species as mountain mahogany and bitterbrush are very important to big game, especially deer, yet the document does not define objectives or proposed management strategies for these species. Again, we would recommend that this be corrected in the final EIS.

The Department is concerned with three major identified actions or predicted consequences of the proposed action including (1) continued degradation of streams and riparian ecosystems, (2) the extent of proposed land treatments (sagebrush control) and (3) forage allocations for mule deer.

7-4 The EIS adequately identifies the importance of riparian areas to wildlife and provides a good assessment of the current condition of riparian ecosystems including streams. The document also properly identifies the influencing factors responsible for the existing conditions and future trends of these significant habitats. The document fairly states that the BLM manual stipulates the enhancement of sport fishery streams to at least good condition, yet the proposed action offers beneficial impacts to only three streams and only the potential for benefit to aspen stands (depending upon grazing treatments actually implemented). We recognize the inherent difficulty of managing riparian ecosystems in the Great Basin with the constraints of providing for traditional rangeland multiple uses (primarily livestock grazing). We do feel, however, that riparian ecosystems, because of their extreme value to wildlife and other rangeland components and uses, merit special management attention. If the state of the art of range management cannot provide for these areas through innovative management strategies, then fencing of such areas may be the only interim solution. If this is the case, the Department of Wildlife would recommend that such action be taken on riparian areas after a careful case by case assessment of individual areas.

The proposed action specifies sagebrush control through spraying or other means on 140,783 acres of rangeland and seeding on 113,966 acres. This will mean the eventual eradication of some 254,749 acres of sagebrush in addition to the 211,423 acres of existing land treatments (Summary Table 4) for a total sagebrush loss of 466,172 acres or 19 percent of this vegetative type.

Comment Letter 7

Mr. Mike Nolan
March 23, 1981
Page 3

Considering the value of this vegetative type to various species of wildlife, but especially mule deer and sage grouse, this seems excessive.

The Department of Wildlife recommends that vegetal manipulation projects be considered on a site specific, case by case basis through the environmental assessment process and in accordance with supplement No. 2 of the Memorandum of Understanding between Nevada Department of Wildlife and the Bureau of Land Management (BLM Manual Section 6521.11B2b). Such consideration in concert with the wildlife safeguards specified under Livestock Support Facilities on page I-13 and Standard Operating Procedure No. 10 (page I-38) should help to preclude significant deleterious impacts to some important wildlife species. It should be noted that the Department of Wildlife strongly supports Standard Operating Procedure No. 10 and the safeguards on page I-13 as specified in the EIS.

We further have very serious concerns for the potential impacts of the proposed spray and seeding projects on antelope, chukar partridge, and California quail. Such concerns can only be properly addressed through a detailed analysis of specific projects as indicated above.

7-5 The final area of major concern to this Department is the proposal to allocate forage to mule deer at level below existing numbers by 578 animals. We recognize that forage is currently substantially over allocated, and that everyone must bear some of the burden in bringing forage utilization in line with forage availability. In this respect, we do not strongly disagree with the actual proposed allocation, and in fact, are particularly satisfied with the proposed allocation for antelope and bighorn sheep. Conceptually, however, we are somewhat troubled by the proposed action. An analysis of AUM allocations shows the following:

Class of Animal	Allocation as Percent of Available Forage	
	Existing	Proposed Action
Livestock	80.4%	83.0%
Big Game	7.1%	13.2%
Horses and Burros	12.5%	3.8%

It is evident from this information that livestock have been, and will continue to be, allocated the "lion's share" of the available vegetation. Although under the proposed action, livestock will experience a substantial reduction in total AUM's allocated, the percent of the total will increase. Granted, big game allocations will show the most substantial increase, but this is only because the existing allocation is so low. In reality we feel that the proposed allocation will not substantially impact deer, and unless the vegetation manipulation projects are improperly designed and placed in important deer winter ranges, the deer resources should benefit from the better overall management of vegetative resources.

Comment Letter 7

Mr. Mike Nolan
March 23, 1981
Page 4

Specific Comments

- 7-6 1. Several different figures are presented in various places in the document concerning the amount of land scheduled for sagebrush control. For example, Table 1-5, page 1-12 indicates 140,783 acres; while the narrative on page 1-11 specifies 163,000 acres; and the narrative on page 3-5, under Soils - Impacts, indicates 308,272 acres of seedings and sagebrush control which is not in concert with the 254,749 acre total used in several places.
- 7-7 2. The Grazing Treatments (page 1-8) appear adequate to address a broad array of management needs, but the positive and negative affects of each treatment or combination of treatments cannot be ascertained until they are displayed in a sequence in the overall management system. Will this be done on an allotment basis as AMP's are developed, and if so, will the AMP's be subjected to public and agency review through the EA process?
- 7-8 3. The Nevada Department of Wildlife endorses and strongly supports the Inherent Requirements as listed on pages 1-32 and 1-38 and 39 under Standard Operating Procedures.
4. Page 1-41, Table 1-23, identifies 22,126 AUM's for reasonable numbers of wildlife. This is the only place where this figure is identified in the document. Is it an accurate figure, and if so, does the difference between this figure and the 16,237 AUM's initial allocation equal the 578 deer for which forage is not allocated?
- 7-9 5. The Wildlife Section in chapter 2, Affected Environment, is well done except for the omission of several important species such as chukar partridge, cottontail rabbit and bobcat.
6. Page 3-13, paragraph 3. A statement indicates that the projected increase in AUM's would be a beneficial impact in many respects and would eventually result in increased numbers of wild horses and livestock. Why is wildlife not also included with livestock and horses?
7. Page 3-28, paragraph 2. We question the expected 50 percent increase of sage grouse and quail populations. With the significant potential for overall increase in vegetative diversity and density, some increase in these populations would appear likely; however, continued degradation of riparian habitats and potential impacts from sagebrush control might well offset the benefits of better upland range management. Because the location of some, and maybe many key sage grouse habitat components (strutting grounds and wintering grounds) have not been documented, the potential for impact to this resource is real, even when applying the inherent requirements and safeguards as specified in the EIS.

Comment Letter 7

Mr. Mike Nolan
March 23, 1981
Page 5


- 7-10 8. Appendix A, page 6-9. It does not seem quite fair to big game to allocate vegetation in surplus of big game reasonable numbers in any allotment to livestock and horses, but then not compensate for big game AUM deficiencies in any allotment by providing those AUM's in an adjacent allotment. In those cases where the big game herd unit would be expected to benefit from the compensated allocation in an adjacent allotment, this should be done.
- 7-11 9. Appendix D, pages 6-17 and 6-18. No mention is made in the Project Design Features of the special provisions for sage grouse and deer as specified in Inherent Requirements 10, under Standard Operating Procedures, or in the safeguards listed on page 1-13. These stipulations should be included here.

Under Guidelines For Use of Herbicides On Public Land, item 6), this guideline should follow supplement No. 2 to the MOU.

We hope that the Bureau of Land Management will find these suggestions and comments helpful in improving the final EIS and in developing land use decisions which will provide for the needs of wildlife and other multiple uses on the public rangelands in the Paradise and Denio Planning Units.

Sincerely,

JOSEPH C. GREENLEY, DIRECTOR


Dale V. Lockard
Acting Director

WM:pw

cc: Game and Fisheries Division
Region I, II, and III
Front Desk
Paul Bottari

Response Letter 7

26

7-1 Issue: Analysis of Impacts to Chukar

Adverse impacts to chukar habitat can be mitigated to some extent under "Standard Operating Procedure 10," page 1-38, and the "Guidelines for Use of Herbicides on Public Land," page 6-17, of the DEIS. Chukar partridge were not addressed in the DEIS because significant impacts to this species resulting from implementation of the alternatives, including the Proposed Action, were not anticipated.

The proposal to apply herbicides to reduce brush may have a significant impact on this species in the Double H Mountains. Should this proposal be brought forth through the CRMP process (see CRMP discussion in the beginning of the Summary in the FEIS), a site-specific environmental assessment will be completed and mitigating measures considered prior to on-the-ground treatment.

7-2 Issue: Analysis of Impacts to Bobcats and Cottontail Rabbits

Affects to bobcats and cottontail rabbits will be analyzed on a site-specific basis through environmental assessments as land treatment proposals are brought forth through the CRMP process. Safeguards to mitigate adverse impacts to these, as well as other species, are considered in the Standard Operating Procedures (DEIS Chapter 1). Coordination between the Bureau of Land Management and the Nevada Department of Wildlife on management actions affecting these species will take place prior to implementation.

7-3 Issue: Management Strategies for Mountain Brush Species

Management strategies for mountain brush species were discussed in the Grazing Treatments section of the Proposed Action on Page 1-8. Although not specifically stated, Treatment 1 would enhance curleaf mountain mahogany and antelope bitterbrush. Treatment 2 specifically states that "mountain browse" will be helped. Treatment 3 also would enhance manogany and bitterbrush but these species are not specifically listed. Impact assessment of the proposed action and alternatives in the DEIS on mountain browse would be premature since the specific grazing treatment prescribed for a given location has not yet been determined. Proper treatment selection will be part of forthcoming activity plans developed through the CRMP process (see discussion on CRMP in the beginning of the Summary in the FEIS).

7-4 Issue: Protection of Riparian Habitat

See response to Issue 5-15.

Response Letter 7

7-5 Issue: Mule Deer Numbers

The DEIS has addressed, by allotment, a forage allocation for mule deer equal to the existing and projected carrying capacities of the available vegetation. It was recognized that the allocation would be a starting point. Monitoring will be used to determine the effects grazing systems and allocations have on available vegetation for mule deer. Permanent increases in excess of the projections made in the DEIS could be used to reduce this deficiency on a case-by-case basis.

7-6 Issue: Incorrect Acres

See Errata - Chapter 1 and Chapter 2.

7-7 Issue: Review of Allotment Management Plans

Allotment management plans will be developed through the CRMP process. See discussion of CRMP in the beginning of the Summary in the FEIS. An opportunity for input into treatments would be afforded at that time. Proposed grazing and vegetation manipulation treatments will be analyzed through the environmental assessment process. It is district policy that all environmental assessments pertaining to activity plans be sent to the State Clearinghouse for review.

7-8 Issue: Big Game Reasonable Numbers

The proposed allocations of available vegetation were considered for analysis purposes only. Progress towards satisfying the forage demand of reasonable numbers will be a management objective in future activity plans. Future use adjustments will be made based on monitoring, CRMP recommendations and according to Bureau policy.

7-9 Issue: Beneficial Impact to Wildlife

Wildlife should have been included in this paragraph. The effects of the management practices on wildlife are analyzed in the Wildlife section on DEIS page 3-18. See Errata - Chapter 3.

Response Letter 7

7-10 Issue: Excess Available Vegetation Allocation

The procedure used to assess big game demand was developed in cooperation with the Nevada Department of Wildlife and was in accordance with Bureau policy. The specific actions warranted to realize improved habitat conditions for increased big game populations will follow implementation of activity plans.

7-11 Issue: Project Design Features

The requirements as listed under "Guidelines For Use of Herbicides on Public Land," DEIS, page 6-17, will afford safeguards to wildlife, specifically under items 1, 2, 6 and 9. These guidelines will be followed in addition to applicable items in the "Standard Operating Procedures."

Comment Letter 8

ROLAND D. WESTERGAARD
Director
Department of Conservation
and Natural Resources

PAMELA B. WILCOX
Administrative Officer

ROBERT LIST
Legislator



Address reply to:
Division of Conservation Districts
201 South Park Street
Nye Building—Control Complex
Carson City, Nevada 89701
Telephone:
(702) 885-5414

STATE OF NEVADA

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES DIVISION OF CONSERVATION DISTRICTS

CLEARINGHOUSE REVIEW

SAI NV#81300028
Paradise Denio Grazing DEIS

This draft Grazing EIS is in many ways an improvement over earlier draft Grazing EIS's. For example, the data base is still poor in many ways, but there is here at least a recognition of the inadequacy of the data base and a commitment to seek better data.

There are some organizational and editing problems with the draft that should be corrected. The table of contents should have more page numbers listed (for example, there are no listed page numbers between page 3-5 and page 3-53). The maps should have numbers on them to correspond to the numbers listed in the table of contents. The plant listed as *Cymopterus corrugatus* on page 2-7 is replaced by *Gauianthus barnebyi* on map #10. Map #9 (Vegetation Types) labels category 008 (white) as "Barren"; this category includes all the private irrigated lands in the area and should be labeled "Other" - irrigated lands are certainly not barren. Map #16 (Wild Horse and Burro Use Areas) does not explain what a "proposed herd management area" is, as compared to a "proposed herd use area," nor does the text help. Map #11 (Livestock Vegetation Condition) is of unclear meaning: even after reading the text, the reader cannot be sure what is meant by "livestock vegetation condition." Does this mean that the vegetation is of types suitable for livestock, or is in good condition, or both, or something else?

This agency has consistently objected to the range suitability criteria utilized by BLM; these criteria are used here again, and we still consider them objectionable. Rather than blind use of a set of overly simplistic criteria, the BLM should develop a more sophisticated and flexible model for management of multiple-use rangelands based on consideration of the entire ecosystem and all of its complex interrelationships.

Better analysis of resource condition trend over time remains a critical need. At least here (p. 2-9) the BLM admits that their data consist largely of visual impressions only. These data must be improved.

8-1

8-2

8-3

8-4

Comment Letter 8

28

Page 2

Soil surveys of the area must be completed as rapidly as possible. Range improvement work will depend upon soil characteristics. We expect that some of the areas shown here for possible seeding projects have soils that will not support those projects; if brush is stripped from these areas, the soils will be left unprotected and erosion will occur. On the other hand, we also expect that soil surveys would show additional areas with potential for seeding projects.

This agency is pleased to see the BLM's commitment to coordinated resource management and planning added to the grazing EIS. Hopefully future monitoring and coordinated planning work will improve the data base, the management criteria, and the quality of management decisions.

Response Letter 8

8-1 Issue: Plant Names and Vegetation Types Map

See Errata - Chapter 2.

8-2 Issue: Proposed Herd Management Areas and Herd Use Areas

See Glossary of the DEIS, page 7-2, for an explanation of these items.

8-3 Issue: Livestock Vegetation Condition

See response to Issue 5-20.

8-4 Issue: Condition Trend Data

See discussion of CRMP at the beginning of the Summary in the FEIS.

Comment Letter 9

ROBERT LIST
GOVERNOR



JAMES P. HAWKE
ADMINISTRATOR

March 13, 1981

MEMORANDUM

TO: Nevada State Clearinghouse
via: Department of Conservation and Natural Resources

FROM: James P. Hawke, Administrator *JPH*

SUBJECT: SAI NV #81300026: Paradise-Denio Grazing EIS

The above referenced document has been reviewed and is found to be consistent with the State Water Resources Plan. The proposed action is given conditional support as outlined below.

1. Development of water resources should be consistent with the state water law procedure.
2. Improved watershed management, soil erosion programs, and riparian habitat improvement programs should utilize practices identified in the state's Best Management Practices (BMP) Handbook.
3. The proposed action indicates that present aum's allocated to big game amount of 16,867. In the year 2024, a total of 17,387 aum's are indicated as allocated to big game, however it has also been stated that bighorn sheep would be re-introduced into the area. Would this mean that the antelope population in the area will be reduced?

JPH:tf

Response Letter 9

9-1 Issue: Reintroduction of Bighorn Sheep

Under this proposal 1,808 AUMs of available vegetation would be recognized as demand for to bighorn sheep in areas suitable for reintroductions. This forage would be used by domestic livestock until such time that the reintroductions take place. The reintroduction of bighorn sheep would not have an effect on the antelope population.

06
Comment Letter



THE NEVADA DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
201 South Fall Street - Nye Building - Room 113 - Carson City, Nevada 89710
MIMI RODDEN, Administrator Telephone (702) 885-5138

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

ROLAND D. WESTERGARD, Director

ROBERT LIST
GOVERNOR

February 19, 1981

MEMORANDUM

TO: Bob Hill, Planning Coordinator
FROM: Division of Historic Preservation & Archeology
SUBJECT: Comments Concerning SAI NV# 81300028 - Paradise-Denio Grazing

The Division has reviewed the DEIS for the above referenced project. We concur with the finding that the project would have no effect on cultural resources eligible to the National Register. The National Register of Historic Places and Divisional files have been researched and no properties listed on or pending nomination to the Register are located in or immediately adjacent to the project area.

Although cultural resources in the project area are probably eligible to the National Register, the project will have "no effect" on the resources.

A copy of this letter should be retained in the project file as documentation of consultation as required under 36CFR, Part 800.4.

MR:vh



Recycling
Nevada's Heritage

Comment Letter

801.b6 (8)



MEMO

TO: Roland Westergard
FROM: John D. Meyer
SUBJECT: PARADISE-DENIO DRAFT GRADING FILE

DATE: March 8, 1981

DIVISION
OF
STATE
PARKS

11-1

As was indicated in our March 13, 1980 Scoping Comments, the EIS should analyze the impacts on other uses that can take place on the lands. Recreation was one of the uses that we felt needed to be addressed with some detail. The EIS, as it is written, does not sufficiently address recreation for it is limited in types of recreation discussed. It does not address dispersed recreation and the affects of the new fencing. The 1978 map published by the U.S. Fish and Wildlife Service, "Habitat Conditions of Fishable Streams", indicates more streams in the area that could be of concern than are shown in the EIS. There is no mention of the protection of Blue Lake and its recreation value. There is no mention of the protection of the Winnemucca Sand Dunes.

11-2

The EIS has an estimate of 200,000 plus visitor days using the area during the year. With this high use there should be some idea of the other types of use other than fishing and hunting. The conflicts that are brought out in hunting and fishing must surely carry over into other recreation activities.

11-3

The EIS on page 3-49 indicates a conflict with Forest Service grazing times. It seems that since the grazing occurs on BLM and Forest Service lands, Federal lands, that there would have been some effort to coordinate a total grazing plan with the Forest Service that would have been agreeable to both parties.

11-4

Lastly, the EIS indicates a budget need and increased staff need to implement the plan. With the current head of the Department of the Interior will there be the budget and authorization of increased staff? If there is not a budget and staff increase will the Grazing Plan still be implemented?

11-5

Briefly, we believe our comments to you of March 13, 1980 are still valid and should be incorporated into the EIS.

JLM:CF:ew

a division of the Department of Conservation and Natural Resources

Comment Letter 11

891.b6 (8)

Roland Westergard

Jay Meierdierck

PARADISE-DENIO EIS AND MFP SCOPING

March 13, 1989

The Division of State Parks reviewed and commented on a similar scoping document in November 1979 for the Paradise-Denio Planning Area. Apparently there has been confusion over the planning process as indicated by postponement and cancelation of meeting and request for comments. Following are the effects on our plans and programs, including comments sent previously.

Since the grazing EIS will allocate the vegetative resources, the water, land use and other resources, for the 3.8 million acres of BLM administered land for the next 35 years, the Division of State Parks feels the statement should include an analysis of impacts on the other multiple uses. Specifically, recreation is not mentioned as a significant nor nonsignificant issue.

Located with the Planning Area is the Blue Lake or Pine Forest Recreation Management Area. This area should be maintained or enlarged to protect Blue Lake and the surrounding recreational lands.

The proposed Desert National Scenic Trail would impact a corner (northwest) of the Planning Unit. The Desert Trail is a significant part of the Nevada State Trail System, being one of three cross-state trails and the only foot-equestrian trail. The exact routing is not finalized, but the MFP and EIS should further refine a corridor. The route currently proposed would enter Nevada at Denio and then go west into the Sheldon National Wildlife Refuge, possibly at Thousand Creek Gorge or Highway 140. The total distance in the Planning Unit would be approximately 10 miles.

Winnemucca Sand Dunes, a proposed National Natural Landmark, are located within the planning unit. These dunes receive high recreational use as well as scientific study. They should receive protective management to maintain these uses.

Cultural Resources are listed in the EIS scoping document as a nonsignificant issue. Yet a 1968 study by the State Park System identified 21 sites in Humboldt County on the basis of their historic significance and potential use for restoration, preservation or marking as a means of interpreting Nevada's history to the public. Further information on these sites can be obtained from the Nevada Division of Historic Preservation and Archaeology.

Comment Letter 11

Paradise-Denio EIS and MFP Scoping
Page 2

The most prevalent form of recreation in the area is "dispersed recreation" which includes activities such as rockcrouching, exploring, OHV, etc. This type of recreation should be given consideration in the MFP. It may be expected to drastically increase as large areas of southeastern Nevada where this activity is widespread, are taken over by MX development.

Disaster Peak, which used to be a Natural Area, has been recommended for consideration as a National Natural Landmark. Planning in the area of Disaster Peak should protect its natural features.

Trough Springs Raised Bog (approximately 1 acre) is another proposed National Natural Landmark. It has survived many years of regulated and unregulated grazing. With more intensive competition for water by livestock and others, it should probably be fenced.

Another potential landmark is Continental Lake. It is unlikely that any proposed action would adversely impact Continental Lake, but nonetheless it should be recognized and considered.

Planning around the Santa Rosa unit of Humboldt National Forest should continue public access to the forest.

The recently completed wilderness inventory should be included in the MFP and grazing EIS, so actions do not impact future wilderness possibilities.

The Little Humboldt River has been inventoried by the Heritage Conservation and Recreation Service, Department of Interior as a natural and free flowing river, with potential for Wild and Scenic River designation. Planning should maintain this status.

Highway 290, through Paradise Valley has been proposed as a scenic highway by Nevada Department of Transportation. This status should be protected also.

And finally there are numerous picnic, fishing and hunting sites that should be maintained for recreational use.

JH:ev

Response Letter 11

Comment Letter 12

11-1 Issue: Identification of Fishable Streams

Any streams omitted from the DEIS either had absolutely no fishing potential or that part suitable to support a fishery was located on the Humboldt National Forest.

11-2 Issue: Impacts to Blue Lake and Winnemucca Sand Dunes

Impacts were only discussed if they were determined to be significant or if a question of potential significant impact was identified during scoping. Therefore, Blue Lakes and Winnemucca Sand Dunes were not discussed in the EIS because the analysis determined that these areas would not be impacted by the alternatives, including the proposed action.

11-3 Issue: Visitor Days

The estimation of 200,000 visitor days is a best estimate. With the exception of hunting and fishing, the Winnemucca District does not have enough reliable use data to break this figure down accurately.

11-4 Issue: Funding and Manpower

For the purpose of this analysis certain basic assumptions were made. One of these, in the DEIS, page 3-2, number 13, was that funding and manpower would be available to implement intensive grazing management (allotment management plans) and associated livestock support facilities. This would include costs for such actions as wildlife, wild horse and burro management and the implementation of monitoring.

11-5 Issue: Recreational Potential

Many comments in the scoping letter are out of date because of decisions made since the scoping process. The National Park Service rejected the idea of a National Desert Trail and, according to the scoping letter from the Heritage Conservation and Recreation Service dated April 22, 1980, the only currently proposed National Natural Landmark in the Winnemucca District is the Black Rock Desert. Cultural resources and wilderness were discussed in the Draft EIS and, in every alternative except No Action, the north fork of the Little Humboldt should improve significantly with regard to aquatic habitat.

In conclusion, all recreational activities will be taken into consideration in future CRMP recommendations and their subsequent use in the planning process.

March 28, 1981
 From Bill and Dale DeLong
 Box 1058, Winnemucca, Nevada 89445

To: E.D.M.
 Answer to; Paradise/Deno Environmental Impact Statement-Draft.

The District Manager once told a crowd, that the men in his office, "Crazing District #2" were the brightest people in Winnemucca. They were all experts in their fields. Now, it does seem a shame that the ordinary citizen in this district has to show them their mistakes.

While most of your maps, only show the location of 2 (two) ranches around Jackson Mountains, there are in fact 16 or 17 families living on the nine ranches located around the mountain.

LAND STATUS MAP: (enclosed map).
 Deeded Land Not Shown, All of Sec. 24, R.30E., T.40N.
 SW 1/4 SW 1/4 of Sec. 19, R.31E., T. 40N.
 30 A. of NW 1/4 NE 1/4 Sec. 25, T.40N. R.31E.

12-1

PROPOSED ACTION: (May enclosed)
 # 1. 5 or 6 miles of fence on the very top of the mountain, thru Elk Creek Basin would be so costly to build and maintain. Besides tearing up the meadow and building arced to the site, you would then be opening up the whole area for machine travel.

#2. These fences are not in the right areas. If fences are put in, they should be altitude fences not cross country fences.

3. A pipeline out of Donna Shea Spring would be better than a well.

RANGE FACILITIES AND LAND TREATMENTS:
 Prescribed Burning: These areas on the west side of Jackson Mountain don't have all that much brush to burn.

LIVESTOCK REDUCTION/ MAXIMIZING WILD HORSE AND BURRO:
 I sure hate to see my horse turned over to the Wild Hores and Burros.

RANGE FACILITIES AND LAND TREATMENTS, EXISTING:
 None of your fences are correct around Jackson Mountain. Ranches not shown are Alexander, Bottle Creek, Happy Creek, User Creek, Mary Sloan and Jackson Creek. Besides fenced fields at Sweeney Field and Bottle Creek. Ranches not shown as fenced are Meyers Farm, Trout Creek, Willow Creek and Upper Happy Creek.

12-1

Corrals not shown are Winter Camp, Hot Springs, Rock Spring, Thacker Well, Rattle Snake, Fox Farm, Norman Dan and Bottle Creek Corral.

Reservoirs not shown are Smokey Spring, Red Putte, Hot Spring, Donna Shea, Fish Pond and Bliss Canyon.

Well and Trough shown as a spring is Salt Well. Winter Camp has a corral, Windmill and trough. Gavica Well has corral, windmill, trough and resevoir.

Water Troughs not shown are; Smokey Spring, Fox Farm, Brush Basin, Railroad Spring, Nobe Spring, Woodcamp, South Spring, Hot Spring, New Years Canyon, White Point Spring, Rattle Snake Spring and Black Canyon.

Comment Letter 12

March 28, 1981
 From: Bill and Dale DeLong
 Box 1058, Winnemucca, Nevada 89445

Continued; To E.L.L.

Water troughs not shown are: Smokey Spring, Fox Farm, Brush Basin, Railroad Spring, Nobel Spring, Woodcamp, South Spring, Hot Spring, New Years Canyon, White Paint Spring, Rattle Snake Spring and Black Canyon.

12-1

Windmills not shown: Hard Fan, Winter Camp, Corneal Well has a trough and reservoir too, North Pottle Creek Butte Well has a trough, Presnol Well and Hidden Playa Wells both have a trough.

There really is no reason for all the mistakes shown on the map of RANGE FACILITIES AND LAND TREATMENTS EMISSION: Bill, John, Tim and Dale DeLong made several trips to the E.L.L. office and showed the E.L.L. personal on large scale maps where and what kind of water developments existed in this area of Jackson Mountain.

12-2

VEGETATION TYPES: you left out Mary Sloan Basin.
 #001 Grass, so many kinds of grass and you say GRASS, what are they? The reseeded areas you put in?

This map looks like a paint by number picture done by a bunch of kindergarten kids. You don't ever have sagebrush areas right.

12-3

HABITAT CONDITION OF FISHABLE STREAMS AND SENSITIVE PLANTS: This is silly, the two excellent fishing streams on your map are Mary Sloan and Boulder Creek, both dry up to the mouth of the canyon most years. Jackson Creek was a good fishing stream until a couple of cloudburst hit it several years ago.

12-4

SENSITIVE PLANTS: I can't find these plants listed in the plant-list sent me by the University. Does # 8. *Cryotes nevadensis* mean a native Nevada blue grass?

LIVESTOCK VEGETATION CONDITION: Why put horses on Jackson Mountain if it's such poor feed. This map contradicts vegetation types maps as to feed in Desert Valley.

12-5

RANGE STUDIES: ENCLOSURES. Sec 25 or 36 (I'm not sure fo location on your map) R. 38 E. T. 39N. Anyway the fenced in plots north of Paradise Hill station the west side of Hwy 95. I've made note of this a sever. meetings and ask what the study data on it was. No one of the E.L.L. personal knew anything about it. So, what is the story on these fenced plots?

12-6

BIG GAME USE AREAS MULE DEER: Altho you show only two ranches around Jackson Mountain, there are eight ranches with irrigation pumps which keep the fields green and lush far into fall. Many fawns are born in these fields. The deer know this and each ranch has many deer in their fields. From observation the deer winter in the south slopes of the foot hills. I know the deer liver year around on or in the Jackson Mountain. Your map doesn't show it.

BIG GAME USE AREAS ANTELOPE AND BIGHORN SHEEP: Antelope yearning range shown isn't the only place they stay year around.

Comment Letter 12

March 28, 1981
 From: Bill and Dale DeLong
 Box 1058, Winnemucca, Nevada 89445

Continued; To E.L.L.

12-7

WILD HORSE AND BURRO USE AREAS: Fence project # 4559 to be removed. There are no wild horses or burros near this area. We have found this fence most helpfull to prevent over grazing.

VISUAL RESOURCE MANAGEMENT CLASSES AND WILDERNESS INVENTORY CATEGORIES: Both maps are ideas I do not like.

The predictions to the year 2024 is hard to swallow.

After living on the Jackson Creek Randh (NV 020-602) for over 40 years, I know no one could have forecast the changes that have occurred in that time. Births and deaths, Rural Power, telephones, black top roads, irrigation wells that have made it possible to grow more forage on each ranch. Cloudburst and fires, good moisture years and bad, late frost and early frosts have made many differenced that no one could fertell. E.L.L. hasn't learned to control the weather yet!

Bill DeLong
Dale DeLong

Response Letter 12

34

12-1 Issue: Map Discrepancies

Maps used in the DEIS were included as references. They are to be used as a basis for comparison of the alternatives including the proposed action and the existing situations. Because of the small scale of these maps (.1 inch equals one mile or 1:663,000) it is extremely difficult to show exact locations. Large scale maps, (e.g., one inch equal one mile) will be used in the development and implementation of any management plans or range improvements.

12-2 Issue: Grass Types

See Table 2-2, DEIS, page 2-5, for an explanation of vegetation type composition.

12-3 Issue: Aquatic Habitat Condition of Fishable Streams

The aquatic habitat section discussed only the condition of the stream habitat. The survey system used to evaluate stream habitat condition dealt with factors such as bank stability, vegetative shading, composition of the stream bottom materials and pool quality. The excellent rating corresponded to the quality of the habitat and not necessarily the quality of the fishing.

12-4 Issue: Sensitive Plants

The common name for Oryctes nevadensis is Nevada digger. Sensitive plants and their common names are listed in the DEIS, page 2-7.

12-5 Issue: Range Study Plot

This study was set up by the University of Nevada, Reno, in the mid 1970s. It was used to study vegetation production on soils that were covered with a vesicular surface layer (a hardened crust).

12-6 Issue: Mule Deer Use Areas

The mule deer use areas delineated on this map represent the areas where major mule deer populations are found. It is recognized that mule deer make occasional use outside these boundaries and live in agricultural fields as well. In addition, there are areas within the delineated boundaries that mule deer make only limited use.

12-7 Issue: Fence Removal to Accommodate Wild Horses

Under the No Livestock Grazing and Livestock Reduction/Maximizing Wild Horse and Burro Alternatives, the Jackson Mountains were proposed as a herd management area. The area would be limited to wild horse use under these alternatives and, therefore, all fences would be removed to insure the continued wild and free roaming nature of the wild horses within the area.

Comment Letter 13



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

Project # D-BLM-K65044-NV

Frank C. Shields, District Manager
Bureau of Land Management
705 East 4th Street
Winnemucca, NV 89445

Dear Mr. Shields:

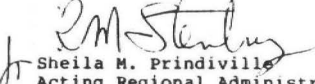
The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM FOR THE PARADISE-DENIO RESOURCE AREA.

The EPA's comments on the DEIS have been classified as Category LO-2. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal Actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

The EPA appreciates the opportunity to comment on this DEIS and requests five copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Susan Sakaki, EIS Review Coordinator, at (415) 556-7858.

Sincerely yours,


Sheila M. Prindiville
Acting Regional Administrator

Enclosure

Comment Letter 13

Water Quality Comments

The Draft Environmental Impact Statement (DEIS) indicates that there will be significant water quality impacts as a result of the proposed plan (see conclusions, page 3-9). At a minimum, the Final Environmental Impact Statement (FEIS) should address the following issues:

- 13-1
1. The DEIS indicates that the water quality impacts of the proposed plan will be from diffuse or non-point sources. The FEIS must demonstrate that the proposed plan is in conformance with the State of Nevada regulations for controlling water pollution from diffuse sources (September 9, 1980).
- 13-2
2. The FEIS should demonstrate coordination between relevant aspects of the State-certified Nondesignated Area Water Quality Management Plan (WQMP, promulgated pursuant to Section 208 of the Clean Water Act) and the Nevada Division of Environmental Protection (NDEP). Specifically, the FEIS should ensure that appropriate Best Management Practices (BMPs), as outlined in the State Conservation Commission handbook, are implemented as appropriate.

Comment Letter 13

EIS CATEGORY CODES

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Response Letter 13

13-1 Issue: Impacts to Water Quality

During the CRMP process water quality will be one of those resources reviewed (see discussion of CRMP at the beginning of the Summary in the FEIS). Impacts to water quality will be addressed on a case-by-case basis as allotment management plans are analyzed through the environmental assessment process.

13-2 Issue: Coordination with State Agencies

The State of Nevada Non-Designated Area Water Quality Management Plan Handbook of Best Management Practices is used in the development of all management plans which are reviewed by the State Clearinghouse. The Handbook is also used in the design of all water developments to be located on public lands.

Comment Letter 14



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL STABILIZATION AND CONSERVATION SERVICE
Humboldt County ASICS Committee
1200 Winnemucca Blvd. East
Winnemucca, Nevada 89445

March 31, 1981

Bureau of Land Management
District Manager, Frank Shields
705 E. Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Shields:

The following is submitted as a comment to the Paradise-Denio Draft EIS.

14-1

The Humboldt County ASC Committee has a serious concern that the 1978 range survey is not the best information available as stated on page 3-2. Their reason for this concern is the severe drought which was well documented and started during the winter of 1976 and ended the spring of 1978. The stream flow from May - July 1977 on the Humboldt River was approximately 5% of normal and Martin Creek 10% of normal. Quinn River was 4% of normal. Precipitation March - May was 20 - 40% of normal. June was very wet with severe cloudbursts which did little good except in the 7000' and up elevations. The balance of the summer and fall of 1977 were generally hot and dry.

Due to the severe losses in both range feed and hay production along with the shortage of irrigation and livestock water, the State of Nevada along with the Congress of the United States saw fit to implement two programs which were administered by this agency. (Drouth and Flood Conservation Program (DFCP) and the Emergency Feed Program (EFP).

The DFPC resulted in expenditures on the farmers and ranchers part in excess of \$300,000 for approved projects. An additional \$300,000 was estimated to have been spent for unapproved projects. Approved projects included livestock watering facilities, irrigation water wells and water conservation measures. Approximately \$65,000 in Federal expenditures was spent in Humboldt County to assist in this effort.

The EFP lasted from September 1977 - April 1978 and resulted in \$295,000 of federal expenditures to assist in the purchase of around 22,000 tons of hay. Humboldt County ranchers spent in excess of \$1,000,000 for feed not normally purchased. In addition it was estimated another 10,000 - 15,000 tons of hay raised by the ranchers, which normally would have been sold as a cash crop, was fed to prevent liquidation of livestock.

Comment Letter 14

Our responsibility, in addition to administering these programs, was to verify the loss in available feed by the rancher. The range conditions were discussed with Bill Markenrider, BLM Area Manager, in September 1977 as in general he stated the range feed was 40 - 60% below normal although the high country above 7000' had good feed.

These facts result in the obvious conclusion that there was no carryover feed into the 1978 Range Year. This in turn resulted in a 1978 range survey which is the newest, but in no way the best information available. It is this Committee's view that an average range survey would result in few, if any, cuts in AUM's if wild horses are reduced to the numbers indicated in the proposed action.

We feel trend studies are necessary to determine trends in the District. The observed trend as based on one individual's opinion (page 2-9) is totally unacceptable in determining trend. Regardless of that person's experience in BLM, it is impossible to accurately determine trend without the proper studies.

This Committee is also very concerned that actions designed to reduce grazing and thereby improve riparian areas and wildlife habitat could in reality have exactly the opposite effect. Since most riparian areas are on private land, permittees forced off public lands would have to fence private lands to survive. This could lead to exclusion of the public and create more intensive grazing in the areas needing the most protection. Reservoirs which this EIS show concern about could, in fact, be drained to produce additional hay or pasture needed to make up for proposed cuts in AUM's. This could, in effect, eliminate the resources you are trying to protect.

The Paradise-Denio EIS neither mentions nor address the impacts caused by the severe drought, the possible closure of private land to the public caused by cuts in AUM's or the possible damage to riparian areas and draining of reservoirs to compensate for the proposed cuts.

Failure to recognize and address these important factors is a serious omission from this EIS.

Sincerely,
For the Committee


John DeLong, Chairman

Certified No. PO3-8236593

Response Letter 14

14-1 Issue: Use of the Range Survey

See discussion of CNMP at the beginning of the Summary in the FEIS.



NEVADA WILDLIFE FEDERATION, INC.

An Affiliate of the National Wildlife Federation
 P. O. BOX 8022 / UNIVERSITY STATION / RENO, NEVADA 89507

April 3, 1981

Mr. Frank Shields, District Manager
 Bureau of Land Management
 705 E. 4th Street
 Winnemucca, Nevada 89445

Dear Mr. Shields:

The Nevada Wildlife Federation has the following comments on the Draft Grazing Environmental Impact Statement for the Paradise-Deno Resource Area.

The fact that the document contains a vast amount of specific information which cannot be thoroughly digested by any single individual makes it difficult for the public to make intelligent recommendations on a specific site or allotment. Therefore, the Federation will comment on the generalities and concepts portrayed in the DEIS. The Federation, however, was enlightened by the fact that the DEIS makes detailed information readily available in a single document.

The standard operating procedures found on P 1-38,39 are very straight forward and meaningful. They would, however, be more meaningful if the BLM could be more prudent in the implementation of these procedures.

The DEIS summary could use a section on the existing environmental conditions. The information can be found in the document, however it is spread through the text and tables and is hard to grasp.

This section might contain some of these facts.

"84% of the range is in 'poor' condition."

"Four of the 77 allotments show an upward trend, 12 show a static trend, and 58 show a downward trend."

CONSERVE OUR NATURAL RESOURCES

Mr. Frank Shields, District Manager
 April 3, 1981
 Page 2

"In general, the quality of mule deer habitat is declining in the resource area...."

"Antelope habitat can generally be characterized as being in 'poor' to 'fair' condition."

"Prime California quail habitat areas are in a degraded condition."

"Deterioration of (sage grouse) habitat because of overgrazing by domestic livestock and wild horses is probably the greatest single factor that has contributed to the decline of this bird."

"A large percentage of the riparian areas are in a deteriorated condition because of overgrazing by livestock."

"86% of the stream miles were in fair or poor condition."

The need for responsible action is long overdue and anxiously awaited; however, the Federation does not find any of the alternatives or the proposed action acceptable. Although they point out the issues and problems, they all fall short of providing and implementing solutions to the basic problem: How can we improve the condition of the native vegetative resource, which would in turn benefit almost all resource users.

15-1

The Nevada Wildlife Federation requests that the BLM include another alternative in the Final EIS which might be called the "Conservation" alternative. Some of the concepts that should be incorporated into this alternative include the following.

1. Available vegetation would be allocated to big game, livestock and wild horses. Combined allocations would not exceed proper use levels. Reduction in livestock and wild horse numbers to, or below the carrying capacity should be implemented immediately.
2. Monitoring programs would be set up in order to make adjustments in allocations as range conditions change. Effective monitoring is essential to any resource management plan.
3. Increases in allocations would be balanced between livestock and wildlife. Native species should be given priority over wild horses and burros in such allocation.

Comment Letter 15

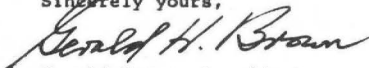
Mr. Frank Shields, District Manager
April 3, 1981
Page 3

4. Proposed range improvements would be geared toward improving our native range instead of artificially rebuilding it with sagebrush control and monotypic seedings. i.e. A range improving from poor to good condition by proper management would be much more acceptable and cost effective than a portion of a range converted mechanically from poor condition to a seeding in good condition. While adjacent areas remain poor.
5. Riparian areas have been continually degraded and would receive special consideration, fencing, rest from livestock grazing, etc.
6. Wildhorses and burros would be reduced or eliminated, in some cases, to allow proper management of the resource.
7. The proposed \$9 million would be used to enhance all uses not exclusively livestock.
8. AMP's should give higher priority to wildlife needs, riparian areas, improving range trend, and improvement of resource as a whole.
9. Available funding would be spent on areas of highest concern to promote rehabilitation of critical areas.
10. Where vegetation manipulation is considered desirable for all resources; prescribed burning would be utilized. Spraying of pesticides would only be allowed in extreme cases.

The "Conservation" alternative proposes to manage the resource for all uses, for the good of the resource.

Thank you for the opportunity to comment on the Paradise-Denio DEIS. The Federation is deeply concerned and wants to be proud of the management of our public lands. Thanking you in advance for your consideration of our comments and suggestion of a true "Conservation" alternative.

Sincerely yours,


Gerald Brown, President

GB:rie

Response Letter 15

15-1 Issue: Need to Consider Alternatives

See response to Issue 5-22. Also, please see discussion of CRMP at the beginning of the Summary in the FEIS.

JOSEPH J. THACKABERRY
LAND MANAGEMENT CONSULTANT

(208) 345-0975

528 Idaho Building
P. O. Box 1405
Boise, Idaho 83701

April 3, 1981

Mr. Frank C. Shields
District Manager
Bureau of Land Management
Winnemucca District
705 E. Fourth St.
Winnemucca, Nevada 89445

Dear Mr. Shields:

Please consider this letter as my comment on Draft Environmental Impact Statement, Proposed Domestic Livestock Grazing Management Program for the Paradise-Denio Resource Area, Humboldt and Pershing Counties in Nevada.

16-1 The Proposed Action to allocate available vegetation is unacceptable. This is due to the fact that the 1978 Range Survey, which is used as the basis for the allocation, is highly inaccurate and unreliable.

Numerous field examinations made by B.L.M. personnel, B.L.M. permittees, and myself reveal that the field data gathered in the 1978 Range Survey is erratic and inaccurate. This is demonstrated by plant species not being recorded on type field write up sheets, where in fact, those plant species actually exist in significant quantities on the ground. Also, actual plant densities and composition in many types are different than that indicated on the field write up sheets. Examination of the compilation of the 1978 Range Survey reveal that data used is inaccurate and improperly applied. This is demonstrated by an erroneous result from the forage acre requirement study, and proper use factors that are unapplicable as to season of use. Suitability criteria, such as the production criteria, for the most part, has been improperly applied.

The results of the 1978 Range Survey as reflected in the Draft EIS are completely unrealistic and cannot be supported by any analysis. It is unfortunate that people who will review this Draft EIS and who are not familiar with the techniques of this type of range survey, will be completely misled by the inaccurate and misleading data derived from the Survey.

Mr. Frank C. Shields
April 3, 1981
Page 2

Because the Proposed Action is based on such inaccurate information as to allocation of vegetation, and because the four alternatives are so unrealistic in practical application, it is suggested that a fifth alternative be developed to replace the Proposed Action. This fifth proposal should adopt as the beginning point for livestock stocking levels, the existing use for livestock for the last three years average licensed use, as set forth in Table 1-1. This average use can generally be used for most allotments concerned. On those allotments where extraordinary circumstances have existed during the last three years, adjustments should be applied to the average as needed. The results of monitoring studies should be used to adjust this initial stocking level as reliable information becomes available.

The development, revision, or maintenance of existing AMP's on approximately 57 allotments as set out in the Proposed Action should be adopted. These improved management systems will not only enhance livestock grazing but will enhance wildlife use as well.

The proposed periods-of-use as set forth in Table 1-1 are idealistic and unrealistic. The establishment of intensive or improved management systems and conventional periods-of-use, will eliminate the reasons for establishing such proposed periods-of-use as set forth in Table 1-1.

The concept of eliminating all horses from all allotments except the Little Owyhee Spring Range is inoperative and unworkable and should be discarded. No exclusive wild horse herd management areas should be established.

I believe that the modification of the Proposed Action as set forth above will more adequately meet the objectives of multiple use management and will also create harmony among the users of the various resources.

I am not going to complement you on the production of the Draft EIS for the reason that I believe the report does not begin to represent conditions as they actually exist in the Paradise-Denio Resource Area. Also, I believe the production of this document has been made at a tremendous cost to the taxpayer, and for the most part this document serves little to no purpose.

Very truly yours,

Joseph J. Thackaberry
Joseph J. Thackaberry

JJT/am
CC Mr. Edward F. Spang

Response Letter 16

16-1 Issue: Use of the Range Survey

See discussion of CRMP at the beginning of the Summary in the FEIS.

Comment Letter 17

April 3, 1981

Mr. Frank Shields, District Manager
Bureau of Land Management
705 E. 4th Street
Winnemucca, Nevada 89445

Dear Frank:

After attending the March Multiple Use Advisory Council meeting and reviewing the Paradise-Denio DEIS, I have several comments concerning future management of the Paradise-Denio Resource Area. I submit the following comments and suggestions for inclusion into the Paradise-Denio final EIS.

The basic document certainly contains a wealth of information and as I read, I had questions which were answered as I read further.

Chapter 2 discusses the condition of the Paradise-Denio Resource Area. Although these depressing statistics are nothing new, the EIS process gives us a chance to make changes and reverse the continual downward trend of our natural resources. The range of alternatives discussed in the DEIS is lacking a good middle of the road alternative. The proposed action is so similar to the all of the other "action" alternatives as far as wildlife numbers are concerned, that there is no real choice. The "no action" alternative is obviously out of the question after the discussion in Chapter 2.

17-1 | The initial allocation of big game forage to meet the demand of the existing population is acceptable. However, increases in big game allocations should be made as range conditions improve instead of the entire allocation going to livestock as shown in essentially all proposals.

17-2 | The proposed action would spend \$9 million on so-called range improvements that would benefit only livestock. First of all, whatever happened to multiple use? Secondly, adopting a plan that is based on future federal funding is wishful thinking.

17-3 |

Comment Letter 17

Response Letter 17

42

Mr. Frank Shields, District Manager
April 3, 1981
Page two

17-4 The objective of improving riparian and stream habitat on P.1-1 seems to have been lost in the shuffle. The proposed action does nothing to improve these areas which are so critical to all wildlife and the resource as a whole. These areas need improvement and the adopted plan should do so.

17-5 Allocation of forage for livestock, wildlife, and wild horses within the productive capability of the land is essential. Equally essential is an effective monitoring program in order to maintain allocations at the proper level.

17-6 Wild horses must be managed as part of the resource if they are not removed entirely from an allotment. Forage allocations for such horses should be made from the livestock allocation, not at the expense of native wildlife species. Also, we need an effective way to remove horses if their numbers get too high.

17-7 I know the Bureau has spent thousands of man hours preparing this document, and I have spent many hours wading through it. I hope my comments will help you and your staff in preparing the final EIS, and most of all help in the proper management of our precious natural resources.

Sincerely yours,
Thomas A. Cavin
Thomas A. Cavin
Wildlife Representative
Multiple Use Advisory Council

TAC:mc

17-1 Issue: Big Game Forage

The forage demand of reasonable big game numbers likely exceeds the available vegetation, and as such represents a management objective to be realized through habitat improvement resulting from the implementation of activity plans.

17-2 Issue: Range Improvements

See Errata - Chapter 1, correction to Tables 1-5, 1-17, and 1-20.

17-3 Issue: Future Funding

See response to Issue 11-4.

17-4 Issue: Protection of Riparian and Stream Habitat

See response to Issue 5-15.

17-5 Issue: Allocation and Monitoring

See discussion of CRMP at the beginning of the Summary in the FEIS.

17-6 Issue: Available Vegetation Allocations for Wild Horses and Burros

The proposed available vegetation allocation in the Paradise-Denio EIS considered competition between livestock and wild horses to be direct and severe. Proposed allocation of available vegetation was either to cattle or wild horses. There were no areas where the number of any wildlife species was reduced to accommodate wild horse numbers.

17-7 Issue: Wild Horse Removal Methods

Presently, wild horse numbers are reduced by using helicopters to round up the animals. This method seems to be the most efficient method of removal and would probably be a primary management tool in the future.

Comment Letter 18

April 2, 1981

Frank Shields
District Manager
Winnemucca District
Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Shields:

Thank you for the opportunity to comment on the Paradise Denio Draft Grazing Environmental Impact Statement.

I feel that the BLM team has done an excellent job of presenting the data collected, and I particularly wish to compliment you on the charts and maps. It is easy to distinguish the effects of the various alternatives.

Perhaps my greatest reservations come from what I perceive as the detrimental effect of the proposed action on the land. For example, one of the adverse impacts listed under the proposed action would be the degradation of riparian areas and aspen stands. Seventeen streams will be degraded in some way, thirteen will exceed turbidity standards, and fourteen will exceed temperature standards. In view of the importance of small streams to the arid southwest, especially wildlife and visual resources, it would seem that such degradation is totally contrary to good land management practices. Any adoption of an EIS which recommends such adverse action would be totally opposed by all environmental and wildlife groups. This section must be modified to insure that good stream habitats can be maintained and poor ones improved.

18-1

Another area of concern is the proposed land treatment program in the recommended action. The seeding of 114,000 acres with a single species - mainly crested wheat grass - is contrary to land management recommendations. Because single species plantings are more subject to grasshopper invasions and various diseases, a selection of native grasses would be far better. As far as sagebrush control is concerned, I feel that prescribed burning does the least environmental damage and contributes least to erosion problems, which are so common on arid western ranges. However, the proposed action recommends use of spraying with 2,4-D over most of the 140,000 acres selected for sagebrush control. The other control would be chaining. Both of these methods are of dubious value and could have gross deleterious effects on the environment.

18-2

18-3

Comment Letter 18

In contrast to the Land Treatment program proposed in this EIS, the Carson City BLM office is proposing burning plus some small amount of chaining mostly to benefit wildlife for their Reno EIS and Land Management plan. They feel that spraying is too expensive. They also believe that planting with a single species is contra-indicated and plan to use a mixture of grasses for their plantings.

Another section of the proposed alternative that concerns me is the recommendation regarding wildlife. The reduction of the deer herd may be realistic, but in many ways hunting is a more important economic resource than open range grazing. Also it is proposed to add 753 head of bighorn sheep to the range, which would compete for the forage needed by cattle. While I am very much in favor of re-introducing bighorn sheep to their native range (for example in the south Jacksons), I do not understand the rationale of a policy that converts one type of browse to another and reduces one kind of wildlife in favor of another.

18-4

The enormous cost of the proposed alternative would hardly seem to be worth the benefits right now. The grazing fee is \$2.25 per AUM. The subsidization of cattle grazing on the open range might be worthwhile if it contributed significantly to the local economy. However, I understand that the largest cattle operation in the area is owned by out-of-state financiers rather than local ranchers. I am not sure that these "absentee landlords" need this kind of financial assistance.

While it is true that much of the range is presently in poor condition, I do not believe the proposed alternative will accomplish a marked improvement in this condition and it certainly will cost an enormous amount of money - a cost that will eventually be picked up by the taxpayer. I understand that it is important to preserve the ranching community in such places as Nevada, but it would seem that this could be accomplished in a modest way with the expenditure of less money and an emphasis on the environmental health of the land and its water, wildlife, and wilderness values. (I plan to comment on wilderness specifically when the studies of the WSA's begin.)

I would urge that a different alternative be studied and that an amended environmental impact statement be issued which accomplishes this goal. While the "no-grazing alternative" is perhaps the best for the land, it is not politically viable and therefore can not be the preferred alternative.

18-5

I would be happy to discuss this EIS with you further because I am very much concerned about the environmental health of this particular area.

Sincerely,

Marjorie Sill
720 Brookfield Drive
Reno, Nevada 89503

Response Letter 18

18-1 Issue: Protection of Stream Habitat

See response to Issue 5-15.

18-2 Issue: Rangeland Seedings

It is current Bureau policy that seedings include a variety of species. Pubescent wheatgrass, Russian wildrye and yellow sweetclover are commonly included with crested wheatgrass for rangeland seedings. Although native species are sometimes seeded or transplanted (e.g., bitterbrush), high cost and low availability prohibits their use in many cases.

18-3 Issue: Methods of Land Treatments

Methods of sagebrush control will be analyzed in Environmental Assessments on a case-by-case basis. The method chosen will be based on the objectives of the project (i.e., enhance mule deer habitat, increase livestock forage, etc.) and characteristics of the environment. Prescribed burning may be the preferred method in many cases. Please note that burning removes vegetation temporarily, leaving the soil unprotected and more susceptible to erosion than spraying would. Spraying with 2,4-D leaves grass and brush stems intact. It is not anticipated that chaining will be widely used in the Paradise-Denio Resource Area due primarily to its high cost. As previously stated, the advantages and disadvantages of the various methods will be considered on an individual project basis.

18-4 Issue: Big Game Numbers

The vegetation manipulation projects proposed under the alternatives, including the proposed action, were primarily analyzed as providing forage for livestock, however, vegetation manipulation projects will be designed to benefit all uses in an area. To accomplish this consideration will be given to project layout and seed mixtures along with other mitigating measures. As analyzed in the DEIS, the treatments as proposed would have a significantly adverse impact on mule deer and antelope in some allotments. On the other hand, there would be some spin-off benefits for bighorn sheep, once reintroduced. Bighorn sheep, however, would not be reintroduced at the expense of other big game species.

Also see response to Issue 24-15.

18-5 Issue: Need to Consider Alternatives

See response to Issue 5-22. Also, see discussion of CRMP at the beginning of the Summary in the FEIS.

Comment Letter 19

CRMP Local #1
815 Harmony Rd.
Winnemucca, NV. 89445

April 2, 1981

Frank Shields
District Manager - BLM
East 4th Street
Winnemucca, NV. 89445

Dear Frank:

RE: Paradise-Denio Grazing EIS Draft

CRMP Local #1 is a local organized group interested in achieving appropriate and suitable multiple use of public lands. The membership represents various state and federal agencies and interest groups.

Several members have submitted written response to the Paradise-Denio Grazing Environmental Impact Statement Draft. These responses express the deficiencies, inaccuracies, omissions and consideration as viewed from their respective areas of interest or expertise.

CRMP Local #1 concurs, there are multiple errors in the EIS Draft that should be addressed by BLM. Consideration was not given to the impact of proposed action upon privately owned lands. Because of the private-public lands relationship in ranching operations, changes effecting public lands most likely translate into adjustments in private land use.

We note the CRMP concept is alluded to in several parts of the draft. Specifically appropriate is that; "Concepts of CRMP will be considered in all cases prior to allocation of vegetation for livestock, wildhorses, burros and big game" (p.iii Summary). The CRMP process as initiated by our group can effectively contribute to an acceptable multiple use of public lands in this District.

Sincerely,

Sammy Ugalde

Sammy Ugalde
Chairman

SU/ljb

19-1

Response Letter 19

19-1 Issue: Role of CRMP

See discussion of CRMP at the beginning of the Summary in the FEIS.

Comment Letter 20

April 3, 1981
Frem John and Judy DeLong
Star Route Box 335
Winnemucca, Nevada 89445

To: B.L.M.
Answer to Paradise/Denio Environmental Impact Statement Draft.

We have a written document from the BLM stating that the survey is in error "wrong information". If we were to use their information based on their survey, the visual operations in the Denio/Paradise Resource Area would go down the drain. After looking through the BIS Draft there mistakes as plain as can be! The District Director once was quoted as saying "No Grazing District" he had the brightest people in Winnemucca in his office. They were all experts in their fields. Are we here to do the corrections for the BLM personnel?

While most of your maps, only show the location of 2 (two) ranches around Jackson Mountains, there are in fact 16 or 17 ranching families living on the nine ranches located around the mountain.

LAND STATUS MAP:

Deeded Land Not Shown: All of Sec. 24, R.30E., T.40N.

SW $\frac{1}{4}$ of Sec. 19, R.31E., T.40N.

30A. of NW $\frac{1}{4}$ NE $\frac{1}{4}$ Sec. 25, T.40N. R31E.

20-1

PROPOSED ACTION:

#1. 5 or 6 miles of fence on the very top of the mountain, thru Big Creek Basin would be so costly to build and maintain. Besides tearing up the meadow and building a road to the site, you would then be opening up the whole area for machine travel.

#2. These fences are not in the right areas. If fences are put in, they should be altitude fences not cross country fences.

#3. A pipeline out of Donna Shea Springs would be better than a well.

RANGE FACILITIES AND LAND TREATMENTS:

Prescribed Burning: These areas on the West side of Jackson Mountain don't have all that rich brush to burn.

LIVESTOCK REDUCTION/MAXIMIZING WILD HORSE AND BURRO:

I sure hate to see my home turned over to the Wild Horses and Burros.

RANGE FACILITIES AND LAND TREATMENTS, EXISTING:

None of your fences are correct around Jackson Mountain. Ranches not shown are Alexander, Bottle Creek, Happy Creek, Deer Creek, Mary Sloan and Jackson Creek. Besides fenced fields at Sweeney Field and Bottle Creek. Ranches not shown as fenced are Meyer's Farm, Trout Creek, Willow Creek, and Upper Happy Creek.

20-1

Corrals not shown are Winter Camp, Hot Springs, Rock Springs, Thacker Well, Rattlesnake, Fox Farm, Morman Dan, and Bottle Creek Corral.

Reservoirs not shown are Smokey Springs, Red Butte, Hot Springs, Donna Shea, Fish Pond, Bliss Canyon and Blue Mountain.

Comment Letter 20

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April 3, 1981
 From John and Judy DeLong
 Star Route Box 335
 Winnemucca, Nevada 89445

Continued: To B.L.M.

Well and trough shown as a spring is Salt Well. Winter Camp has a corral, windmill and trough. Gavics Well has a corral, windmill, trough and reservoir.

Water troughs not shown are: Smokey Springs, Fox Farm, Brush Basin, Railroad Springs, Nobel Springs, Woodcamp, South Spring, Hot Spring, New Years Canyon, White Point Spring, Rattlesnake Spring, Black canyon, and Trail Springs.

20-1 Windmills not shown: Hard Pan, Winter Camp, Corbeel Well has a trough and reservoir too, North Bottle Creek Butte Well has a trough, Praelon Well and Hidden Playa Wells both have a trough.

There are really no reasons for all the mistakes shown on the map of RANGE FACILITIES AND LAND TREATMENTS EXISTION. Bill, John, Tim and Dale DeLong made several trips to the B.L.M. office and showed the B.L.M. personnel on large scale maps where and what kind of water developments existed in these areas of Jackson Mountains.

20-2 HABITAT CONDITION OF FISHABLE STREAMS AND SENSITIVE PLANTS: This is silly! The Two excellent fishing streams on your map are Mary Sloan and Boulder Creek, both dry up to the mouth of the canyon most years. Jackson Creek was good until a couple of cloudbursts hit it several years ago.

SENSITIVE PLANTS: I can't find these plants listed in the plant list sent me by the University.

LIVESTOCK VEGETATION CONDITION: Why put horses on Jackson Mountain if it's such poor feed? This map contradicts vegetation types maps as to feed in Desert Valley.

20-3 RANGE STUDIES: ENCLOSURES: Sec. 25 or 36 (I'm not sure of location on your map). R. 38E. T.39N anyway the fence inplots North of Paradise Hill Station the West side of HWY 95. I've made note of this at several meetings and ask what the study data on it was. Not one of the B.L.M. Personnel knew anything about it. So, What is the Story on these fenced plots?

20-4 BIG GAME USE AREAS, MULE DEER: Altho you show only two ranches around Jackson Mountain, there are eight ranches with irrigation pumps which keep the fields green and lush far into fall. Many fawns are born in these fields. The deer know this and each ranch has many deer in their fields. From observation the deer winter in the South slopes of the foot hills. I know the deer live year round on or in the Jackson Mountain. Your map does not show this. The map does not show year round spring time use on Jackson Mountain. Where do they go? Nothing is said about the hundreds of deer on private lands year round on Jackson Mountains and Pine Forest.

Comment Letter 20

April 3, 1981
 John and Judy DeLong
 Star Route Box 335
 Winnemucca, Nevada 89445

Continued: To BLM

BIG GAME USE AREA, ANTELOPE AND BIGHORN SHEEP: Antelope year long range shown isn't the only place they stay year around.

20-5 WILD HORSE AND BURRO USE AREAS: Fence project #4559 to be removed. There are no wild horses or burros near this area. We have found this fence most helpful to prevent over grazing. Wild horses have never used higher elevations. Shawnee Creek to Bonita Spring South has been their main country. There has always been a migratory route from South Jackson Mountain across the Black Rock Desert to the Black Rock Range and back.

VISUAL RESOURCE MANAGEMENT CLASSES: Whose visual eye was it? Was it a westerners visual eye or an easterners? Its a matter of opinion bases on who promoted his education.

WILDERNESS INVENTORY CATEGORIES: The West side of South Jackson Mountain from Brush Basin South around to Alaska Canyon on the North is the only real actual wilderness country on Jackson Mountain. This is where we proposed a wilderness area. The boundaries are natural, self explanatory whsreaver one looks at the terrain.

This whole book seems too complicated and complex for some to understand. Those who are not aware of the possibilities of errors believe it to be the gospel truth!

*John DeLong
 Judy DeLong*

Response Letter 20

- 20-1 Issue: Map Discrepancies
See response to Issue 12-1.
- 20-2 Issue: Fishable Streams
See response to Issue 12-3.
- 20-3 Issue: Range Studies
See response to Issue 12-5.
- 20-4 Issue: Mule Deer Use Areas
See response to Issue 12-6.
- 20-5 Issue: Fence Removal
See response to Issue 12-7.

Comment Letter 21



Established 1864

NINETY - SIX RANCH

(702) 578-3541

Commercial Cattle

Paradise Valley, Nevada 89426

April 6, 1981

Frank Shields, District Manager
Bureau of Land Management
Winnemucca, NV 89445

Dear Mr. Shields,

I wish to comment on the Paradise-Denio Grazing Environmental Impact Draft Statement.

I have written letters on other occasions prior to the publication of the draft statement. To assure that my previous comments be considered within the time frame of the comment period following publication of the draft statement, I am resubmitting those letters. They are enclosed herewith.

In addition I would like to make the following comments:

- 21-1 1. It is my judgement, based on a lifetime familiarity with the Ninety-Six Ranch Allotment, that there are many inaccuracies and mistakes in the statement. The range survey was done in a year immediately following an extreme draught, and thus did not reflect the true overall condition of the range. Methods and factors used in figuring available forage were not consistent with range conditions in this area. Other criteria should have been applied in order to indicate true conditions. There are many indications to me that this range is in an upward trend, however the survey indicates it is 66% overgrazed. My cattle have always left the range in good condition which they would not have done if the range had in truth been so greatly overgrazed. This fact alone convinces me that the range survey was grossly inaccurate.
- 21-2 2. The maps do not show all the available water. Many springs have been omitted.
3. The forage type lines are not accurate in several instances; specifically in the Mud Springs and lower Charlie Young areas.
- 21-3 4. It has always been recognized that there are no wild horses on the Ninety-Six Allotment. Yet the map showing the proposed wild horse management area includes the eastern portion of the Ninety-Six Allotment near Greeley and Sagehen.

Comment Letter 21

48

2.

5. Consideration should be given to the fact that the range cattle industry is energy efficient. Very little fossil fuel is expended to produce a valuable and necessary food item, in contrast to the large amounts of fuel used in an intensive farming operation. If the range cattle industry is not permitted to survive, many operations will be forced to become more intensive, thus much less energy efficient, with the subsequent higher food prices.

In closing I want to repeat and emphasize several points contained in my previous letters that I feel are crucial to the continued operation of the Ninety-Six Ranch.

1. Spring use is the historic and licensed use of the Ninety-Six Allotment. Spring use works into ranch and Forest Service management. Elevation, available water, and forage types are best suited for spring use. The existing AMP meets the needs of rest and deferment of the plants on the basis of spring use.

2. The range survey on the Paradise-Denio district should not be used to determine proper stocking rates. Instead, present numbers should be used as a starting point. Then adjustments should be made, upward or downward, by establishing and monitoring trend and condition studies.

Thank you for the opportunity to comment.

Sincerely,

Leslie J. Stewart
Leslie J. Stewart

Response Letter 21

21-1 Issue: Range Survey

See discussion of CRMP at the beginning of the Summary in the FEIS.

21-2 Issue: Map Discrepancies

See response to Issue 12-1.

21-3 Issue: Location of Herd Management Areas

The Little Owyhee Herd Management Area shown on the Wild Horse and Burro Use Area map in DEIS Chapter Two should only include that part of the Little Owyhee known as the Spring Range. Any area west of the Spring Range boundary that is shown as a Herd Management Area is incorrect and was caused by a distortion on the map when transferring information from larger scale maps. The allotments that are within use areas are listed in Table 2-8 of the DEIS.

Comment Letter 22

T Quarter Circle Ranches, Inc.
3000 Highway 40 West
Winnemucca, Nevada 89445

Bureau of Land Management
Nevada State Office
300 Booth Street
P. O. Box 12000
Reno, Nv.

Attention: Mr. Ed Spang

I wish to make a public comment on the Draft Paradise-Denio Grazing Environmental Impact Statement.

22-1

The entire E.I.S. is based on a range survey which was poorly done. Since it was an Ocular survey it is extremely susceptible to personal opinions and personal bias. The "on-the-ground" experience of the survey crews were very limited. The credibility of the E.I.S. will depend largely on the Bureau's ability to accurately reflect site specific variables, rather than questionable broad generalizations concerning the three suitability criteria.

The current proper-use-figures have been adjusted since the early 1960's survey. This apparently was done without actually consulting any animal nutritionists. Thus, many high quality forage species do not have P.U.F.s. This apparently was done to provide credibility to the Bureau's position concerning range conditions, example, the fictitious "Nevada Report". If the old P.U.F.s were used, there would be no need for a reduction of any A.U.M.s. It would clearly show that most of the range is at least in a stable condition or actually on an upward trend.

The Forage Acre Requirement is wrong. It is an average of native range P.A.R. taken at Squaw Butte in Oregon, and several area "crested wheat seedings" (some in very poor condition, because of lack of BLM maintenance.) It should not be an average, as native range and "crested wheat seedings" are always used separately. In fact many allotments do not even have "seedings".

This poorly compiled 'Range Survey' is the Bureau's only source for justifying a reduction of A.U.M.s. With a truer 'Forage Acre Requirement' figure, more reasonable 'Proper Use Figures' and corrections of obvious mistakes in the survey, a much fairer 'Resource Management Plan' could be arrived at.

Comment Letter 22

-2-

The period-of-use figures do not consider at all the large amount of forage available from annuals. These annuals can only be used properly from approximately March 1 to June 30 each year. Some use of this large amount of top quality forage needs to be incorporated into the proposed action as well as any alternative considered. None of the alternatives consider any/or reduction in A.U.M.s will have on private land in the unit. Most streams are either on private property or access is controlled by private property. Most of the large season long streams are controlled by valid state water rights. If A.U.M.s are reduced and/or period-of-use changed, nearly all private property now managed by the BLM (under exchange-of-use) will be fenced. This will cause a severe impact on riparian qualities, wildlife and public access on such lands.

Regarding general range conditions, of which the BLM has no valid studies concerning actual trend, the alternative of "No Action" is the most economically feasible. The trend of the range should be studied for a period of a few years and adjustments could be made as needed.

The following is a list of the types in the survey which we feel contain mistakes: Sand Pass--42-01, 42-03, 42-04, 42-05, 42-07, 42-011, 42-012, 42-015, 42-016, 42-018, 42-022, 42-023, 42-025, 42-026, 42-030, 42-033, 42-041, 42-050---Humboldt Valley--- 62-002, 62-005, 62-007, 62-014, 62-016, 62-021, 62-024, 62-028, 62-028, 62-038, 62-041, 62-043, 62-046, 62-047, 62-049, 62-050, 62-051, 62-053, 62-058, 62-060, 62-063, 62-064, 62-065, 62-066, 62-067, 62-069, 62-070, 62-076, 62-077, 62-103, 62-104.----- Sand Dunes--60-004, 60-005, 60-011, 60-013, 60-014, 60-017, 60-019, 60-022, 62-032, 60-036, 60-042, 60-060, 60-064, 60-077, 60-078. The Draft also show a fence around the Sand Pass allotment which is erroneous as there is no fence there.

22 2

22-3

The draft does not recommend removal of wild horses from Sand Pass, Sand Dunes and Humboldt Valley allotments until about 1987. All three allotments contain over 50% private land, all owned or controlled by the permittee's. Most of this private acreage is managed under exchange-of-use agreements. Some is used without exchange-of-use for livestock grazing. The BLM has been asked in writing, numerous times since 1977 and in personal meetings even before 1977, to remove these horses as required by law. The BLM has continuously ignored the T Quarter Circle Ranches requests. Now the T Quarter Circle permit is in jeopardy because of the mismanagement of the horses by the BLM. This is to say nothing of the possible long term damage the horses have possibly caused to public domain, private acreage, private property and wildlife. These horses utilize water pumped by the permittee and many times cause great damage to private property, such as pump engines, corral fences, and young calves besides drinking most of the water and keeping the permittee's cattle away from the waters.

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Comment Letter 22

-3-

If the BLM would have managed the wild horses and asked for and accepted local cooperation the range would be in even better condition than it actually is, and the BLM could be held in much higher esteem.

Instead of trying to manage the range lands of the West from behind a desk in Washington D.C., wouldn't it be more sensible to manage the land from the back of a horse or from behind a "sage brush" in the West in cooperation with the people from the West who know and use the land being managed?

Very truly yours
T QUARTER CIRCLE RANCHES, INC.


Hank Angus

CC: Frank Shields

Response Letter 22

22-1 Issue: Range Survey

See discussion of CRMP at the beginning of the Summary in the FEIS.

22-2 Issue: Map Discrepancies

See response to Issue 12-1.

22-3 Issue: Wild Horse Removal

The priorities for reduction of wild horse and burro numbers were determined by locations for proposed herd management areas, herd use areas and then for areas where range condition is most susceptible to overuse. The area where Sand Pass and Sand Dunes allotments are located, because of funding priority changes since the release of the DEIS, is presently scheduled for reduction of wild horse numbers during the fall of 1981.

Comment Letter 23

Box 98
Golconda, Nv. 89414

Bureau of Land Management
Nevada State Office
300 Booth Street
P. O. Box 12000
Reno, Nv.

Attention: Mr. Ed Spang

I wish to make a public comment on the Draft Paradise-Denio Grazing Environmental Impact Statement.

23-1

The entire E.I.S. is based on a range survey which was poorly done. Since it was an Ocular survey it is extremely susceptible to personal opinions and personal bias. The "on-the-ground" experience of the survey crews were very limited. The credibility of the E.I.S. will depend largely on the Bureau's ability to accurately reflect site specific variables, rather than questionable broad generalizations concerning the three suitability criteria.

The current proper-use-figures have been adjusted since the early 1960's survey. This apparently was done without actually consulting any animal nutritionists. Thus, many high quality forage species do not have P.U.F.s. This apparently was done to provide credibility to the Bureau's position concerning range conditions, example: the fictitious "Nevada Report". If the old P.U.F.s were used, there would be no need for a reduction of any A.U.M.s. It would clearly show that most of the range is at least in a stable condition or actually on an upward trend.

The Forage Acre Requirement is wrong. It is an average of native range P.A.R. taken at Squaw Butte in Oregon, and several area "crested wheat seedings" (some in very poor condition, because of lack of BLM maintenance.) It should not be an average, as native range and "crested wheat seedings" are always used separately. In fact many allotments do not even have "seedings".

This poorly compiled 'Range Survey' is the Bureau's only source for justifying a reduction of A.U.M.s. With a truer Forage Acre Requirement' figure, more reasonable 'Proper Use Figures' and corrections of obvious mistakes in the survey, a much fairer 'Resource Management Plan' could be arrived at.

Comment Letter 23

-2-

The period-of-use figures do not consider at all the large amount of forage available from annuals. These annuals can only be used properly from approximately March 1 to June 30 each year. Some use of this large amount of top quality forage needs to be incorporated into the proposed action as well as any alternative considered. None of the alternatives consider any of the adverse effects the changes in period-of-use and/or reduction in A.U.M.s will have on private land in the unit. Most streams are either on private property of access is controlled by private property. Most of the large season long streams are controlled by valid state water rights. If A.U.M.s are reduced and/or periods-of-use changed, nearly all private property now managed by the BLM (under exchange-of-use) will be fenced. This will cause a severe impact on riparian qualities, wild life and public access on such lands.

Regarding general range conditions, of which the BLM has no valid studies concerning actual trend, the alternative of "No Action" is the most economically feasible. The trend of the range should be studied for a period of a few years and adjustments could be made as needed.

The following is a list of what we feel are mistakes in the range survey on the Golconda Butte Allotment. 41-014, 41-020, 41-005, 41-016, 41-013.

23-2

After reviewing the draft we find that the BLM has mistakenly listed the boundary of the Golconda Butte and Sand Pass allotments as being fenced. This is completely wrong, there is no fence, and how many other mistakes has the BLM made area wide?

Very truly yours

Glenn Tipton
Glenn Tipton

F. H. Frosty Tipton
F. H. Frosty Tipton

cc: Frank Shields

Mitch Moiola
Mitch Moiola

Response Letter 23

23-1 Issue: Range Survey

See discussion of CRMP at the beginning of the Summary in the FEIS.

23-2 Issue: Map Discrepancies

See response to Issue 12-1.

Comment Letter 24

The Wildlife Society

Nevada Chapter
P.O. Box 1806
Carson City, NV 89701

1 April 1981

Mr. Frank C. Shields, District Manager
Bureau of Land Management
705 E. 4th Street
Winnemucca, NV 89445

Dear Mr. Shields:

The Nevada Chapter of The Wildlife Society has reviewed the Draft Environmental Impact Statement (DEIS) for the Paradise-Denio Resource Area and our comments follow.

In general, this is the best prepared grazing DEIS of any we have reviewed for Nevada. It has been well layed out, the discussions are for the most part succinct, to the point, and provide an accurate description of the existing situation, and proposed action and alternatives. Even though we do not agree with all of the discussions or management approaches, it is a well done document. Our comments will range from fairly general to fairly specific, depending on the topic we are addressing.

Tables. Summary Table 1 is the first of its kind we have seen in a grazing EIS and we hope all future BLM grazing EIS's will have this feature: it allows the reader to quickly peruse the proposed action and alternatives and their effects. Several tables were, however, difficult to read--specifically tables 1-1, 1-2, 1-14, 1-16, 1-19, and 3-5. Making the type larger at the expense of several additional pages would be a preferred alternative.

- 24-1** Maps. These are generally easy to read and understand, and have adequate color contrast. Specific comments: 1. Land Status--the term National Resource Lands was outdated three or four years ago--we suggest you use the term Public Lands, instead.
- 24-2** Range Facilities and Land Treatments--1980--Proposed Action--the legend should include the number of acres of sagebrush control and seedings, plus the numbers of other improvements--miles of fence, spring developments, pipelines, etc. 3. Range Facilities and Land Treatments--Maximizing Livestock Alternative--1980: prescribed burning is shown here, but not in the Proposed Action. Why? 4. Range Facilities and Land Treatments Existing--no seedings or spray jobs are shown. Was this area not a part of the old Beowawe project, and were not considerable acreages sprayed and seeded? On page 2-11, in the discussion on Sage Grouse it is noted that 94,220 acres of sagebrush had been removed. These areas should be shown on the existing

The International Organization of Professional Wildlife Ecologists and Managers



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range facilities and land treatments map to put things in accurate perspective for the reader. These would be particularly necessary when making comparisons between this map and the proposed action map. 5. The map showing Antelope and Bighorn Sheep is slightly misleading as there are no sheep on BLM public lands now, but the legend does not state this. Map comparisons. 1. Livestock Vegetative Condition vs. Range

24-5 Facilities and Land Treatments--Proposed Action: why is sagebrush control necessary in the Willow Creek area north of Greeley Crossing if range condition is good? Is this project really needed? The same questions apply to the Willow Springs area on the east side of the Pine Forest Range. 2. Vegetative Types, 1980 vs. Bighorn use areas: the Jackson Mountains are pinyon-juniper or saltbush; the rest of the sheep use areas are in big sagebrush types. These types are not preferred by most bighorns, exceptions being those sheep which come from the Desert National Wildlife Refuge north of Las Vegas. We, therefore, wonder about the suitability of these areas. Perhaps more discussion should be devoted to the proposed sheep release areas in the narrative of the DEIS.

24-6 Wild and Free Roaming Horses. We totally endorse the proposed reductions of horse numbers under the proposed action, including their restrictions to just a few areas instead of resource area wide.

24-7 Soils. We question whether any soil loss is acceptable in Great Basin wildlands. The Soil Conservation Service's accepted criteria of three to five tons per acre is questionable, as most of their work, except for soil survey work for the BLM, has been on private lands having much better soils than are normally found on the rangelands in the Great Basin. A conversion of the tons per acre to inches of soil lost per acre would be much more meaningful to those of us reading the EIS. We suggest this change be made in the final EIS.

24-8 Sensitive Plants. New data are available since the DEIS was prepared: these should be used. They include a new federal listing of endangered plants plus those under consideration for listing, plus results of a meeting on T & E plants held last November in Reno. Your district botanist should have this information at hand. Also, Pinzel, 1978 and 1979 should be spelled Pinzl.

24-9 Chukar. The DEIS does not cover the most important upland game species in the DEIS area--chukar. We are very surprised that this species was omitted. The Paradise-Denio EIS area has some of the best chukar populations and finest hunting anywhere in the United States, based on our knowledge, experience, and Nevada Department of Wildlife data. To leave them out is a major omission. While chukars may not be severely affected by the proposed action, certain populations might be, such as those using the Double H mountains, which are proposed for sagebrush spraying in their entirety. While

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24-9 chukars do not utilize sagebrush for food, sagebrush provides essential escape cover. In areas which have had sagebrush removed, either by spraying or by fire, even though there may be a good stand of cheatgrass remaining, use by chukars is low. We urge you to put a thorough discussion on chukars into the final EIS, as they will be affected by the proposed action, and they are such an important recreational species.

24-10 Forage Allocation. We are not happy to read that 550 to 740 deer from existing populations will not be allocated forage. In perspective, this is a 14 or 15 percent reduction from the estimated 5,000 animals which use the area. We are happy to see that forage will be allocated to bighorn sheep and for additional antelope. We support this overall concept in that a greater species diversity will be the likely result. We support the overall forage allocating as it is described in the DEIS--a major reduction for both livestock and wild horses. We realize that the vegetation resource is finite, and agree that the proposed action is necessary. We do, however, seriously question the concept of forage allocation under the No Livestock Grazing Alternative--what is the use of, or need for, allocating forage to the remaining big game and wild horses? We cannot see a need for this, as current populations of deer and horses are a long way from filling the AUM consumption gap caused by removal of livestock. A technical point: Summary Table 1 shows only cattle as being present, yet the narrative states there is one full time sheep permittee in the DEIS area, plus three other permittees who run both sheep and cattle. This should be clarified in the final EIS.

24-12 Small Habitats. While there are broad expanses of typical vegetation such as sagebrush, saltbrush, and pinyon-juniper, there are very restricted habitats such as springs and seeps, upland meadows, riparian zones, and groves of quaking aspen and mountain mahogany, which are of crucial importance to wildlife. While these habitats in the Great Basin comprise less than one percent of the land surface, they are essential to the continued survival of at least 75 per cent of the vertebrate wildlife living in the Great Basin. These habitats supply part or all of the annual life cycle requirements for these species. If the habitats are further degraded or destroyed, wildlife individuals and perhaps populations may be lost. The riparian habitats are of particular importance, for no other habitat supports such a diverse fauna in terms of both species and individuals. Riparian habitat, or its maintenance and improvement, are the number 8 objective for this DEIS, yet every action--the proposed action and all the alternatives except No Livestock Grazing (which is unrealistic) will degrade riparian habitat in the Paradise-Denio EIS area! According to the data supplied in the EIS area there are 3,694 acres of riparian habitat--out of 4,330,283 total acres in the EIS area. Yet there is not one proposal to protect any of this small acreage of riparian habitat by any means! This to us, as professional wildlife biologists and managers, is totally unacceptable! We are simply appalled that there is so little regard for riparian habitat in this DEIS. At the least,

every bit of identified riparian habitat should be fenced to exclude all livestock and all wild horses. Nowhere has it been demonstrated that any grazing system or grazing management scheme will do anything other than degrade riparian habitat. To put this situation in perspective, the proposed action including all support facilities (Table 1-5) will cost NINE MILLION DOLLARS (at 1980 costs). Riparian areas are so few, so fragile and so important to so many wildlife species, that they must be protected, preferably by fencing. And the additional costs of a few more miles of fence will only be a drop in the bucket compared with the total implementation costs. The same can be said for aspen stands, as they are also very important to many wildlife species. They too, are miniscule in acreage when compared with the EIS area size. We urge that aspen stands be protected by fencing, as fencing is the only tool which we are aware of that will do an adequate job of protection. To not fence or otherwise protect these areas is, we feel, to abrogate BLM's responsibilities as resource managers of public lands. Protection of these habitats, particularly riparian, is required in BLM manual 6740, presidential executive order, and PLMTA. As a last comment, we urge you to send as many of your range and wildlife specialists and area managers as possible to the symposium sponsored jointly by The Wildlife Society and Society for Range Management which will be held in Winemucca on April 14, 15, and 16. Hopefully those who prepared the DEIS will learn first hand of the importance of these small habitats to wildlife.

24-13

Streams. Again, these are very small habitats, very restricted, and yet the proposed action will allow continued deterioration on 17 of the 20 which the DEIS noted are protectable. This is simply unacceptable, for most of the reasons discussed above. We offer the same suggestions as for riparian areas: protect these limited habitats by fencing them, as nothing else we are aware of seems to work. It should not be the responsibility of the BLM's wildlife habitat program in your district to protect streams and riparian areas from the continued degradation caused by livestock grazing--even BLM policy notes this. We urge you to reconsider the effects of the proposed action (and all alternatives except No Grazing) on streams, and add sufficient fencing in the final EIS proposed action to adequately protect this extremely valuable resource.

24-14

While there are several grazing treatments discussed on pages 1-8 and 1-11, and while we support several of these (Treatments 1 and 2) for improving aspen and perhaps riparian areas, we seriously question their feasibility in the real world of functional allotment management plans and permittee cooperation. In other words, these look good on paper, but we doubt whether they can ever be implemented. We must note, however, that this discussion of grazing treatments is the first of its kind we have seen in a grazing EIS and you are to be commended for it.

Spraying and Seeding. The total of 254,000-plus acres of seeding and spraying is an awesome amount by anyone's standards. We will preface our remarks on this by saying that we urge you to use every possible means but spraying and seeding (which includes water developments, fencing, and proposed grazing treatments) for two full grazing cycles, if possible, before embarking on the ambitious vegetative type conversion program described in the proposed action. Barring that, we support the spray-seed program you propose as long as you follow the restrictions you have discussed, such as spraying in strips in deer use areas, and following the guidelines set forth for sage grouse habitat protection as presented by the Western States Sage Grouse Committee. The inclusion of these stipulations is commendable, and we highly support your stand. There are, however, several statements in the DEIS which need clarification. Page 3-14: 2,4-D "is thought to have no detrimental effect" yet no one knows for sure. It is also stated that forbs return to their former abundance in 5 to 19 years after spraying. We find this unacceptable, considering the life spans of most wildlife species, including mule deer, antelope and sage grouse are less than ten years. What will these semi-forb dependent wildlife species and populations exist on during the first four years after spraying has been done? Forbs are essential for the survival of sage grouse chicks, and they are essential lactating mule deer and antelope.

24-15

Potassium Nitrate poisoning: "large herbivores must be restricted from using those plants which accumulate potassium nitrate". If such plants are found in the EIS area, how do you propose to restrict their use by mule deer and antelope? This point should be addressed in the final EIS. We do appreciate the honesty and candor expressed in the various discussions of the effects of these management methods which will alter so much habitat. We suggest also, where spraying is considered near riparian and meadow areas, that the protective buffer strip be widened from 300 feet to 1,500 feet. We have seen such things as domestic rodes killed by 2,4-D which had drifted almost a mile. . . .

24-16

Other comments. Bighorn sheep--how firm are the release site proposals? We are aware that the Nevada Department of Wildlife discussed proposed releases on public lands in several Nevada BLM districts, and urged the BLM to develop habitat management plans and their environmental analyses for sheep transplants. The plans were written, but NDOW plans or priorities changed and the releases have either not been made or have been delayed several years. It is something the Winemucca district should be aware of. Something which you might consider in the final EIS is to concentrate the bighorn sheep transplants to only two or three sites, and let the forage allocated to the other sites revert to use by mule deer and antelope where they are present.

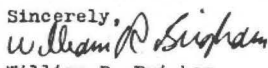
24-17

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Overall, as noted above, this is the best grazing DEIS we have reviewed. The document is well written, gives an honest appraisal of the effects of the proposed action and alternatives, particularly as they affect wildlife habitats, the grazing methods discussion and summary tables are well thought out and prepared, as is the first part of chapter three-- assumptions and analysis guidelines, the threshold concept, and so on. We urge you to make the changes we have suggested, particularly as these apply to riparian areas and other small habitats including streams, and proposals for spraying and seeding.

We thank you for the opportunity to comment and wish to be kept on all mailing lists for the final EIS for Paradise-Denio, all segments of CRMP, as well as the Sonoma-Geilach EIS.

Sincerely,

William R. Brigham
President

Response Letter 24

24-1 Issue: Land Status Terminology

See Errata - Chapter 1.

24-2 Issue: Range Facilities and Land Treatments

A complete breakdown of size and number of range facilities and land treatments by allotment are shown in the DEIS Appendix B, Section 2, page 6-1.

24-3 Issue: Prescribed Burning

The proposed prescribed burning areas shown on the Range Facilities and Land Treatments - Maximizing Livestock Alternative Map are areas that are specifically identified for that type of treatment. Other areas proposed for sagebrush control (either in the proposed action or maximizing livestock alternative) may be controlled by a variety of different methods which include discing, chaining, burning, spraying, etc. as stated on DEIS page 1-11. No areas in the proposed action were specifically proposed for prescribed burning, however, this type of land treatment may be identified during the CRMP process. See response to Issue 18-3 and discussion of CRMP in the beginning of the Summary in the FEIS.

24-4 Issue: Existing Seedings and Spraying

There were considerable acreages seeded and sprayed in the Paradise-Denio Resource Area. Agreeably, addition of existing spraying and seeding would have been helpful in comparing the alternatives. All information necessary for this comparison is available in the Winnemucca District Office.

24-5 Issue: Big Game Use Areas - Antelope and Bighorn Sheep Map

See Errata - Chapter 2.

24-6 Issue: Proposed Land Treatments

The DEIS identified areas that have potential for land treatments. Actual on-the-ground manipulations will not take place until their need is identified through the CRMP process and an environmental assessment and cost-effective analysis have been done.

24-7 Issue: Sediment Yield Measurements

Tons/acre is a generally accepted unit of description used in sediment yield determination, just as gallons/minute is commonly used in water quantification. One reason for this is that soil loss in inches would be measured in minuscule amounts (i.e., one tone/acre equals .006 inches of soil loss).

24-8 Issue: Sensitive Plants

See Errata - Chapter 2, Chapter 3 and Bibliography.

Response Letter 24

24-9 Issue: Analysis of Impacts to Chukar

See response to Issue 7-1.

24-10 Issue: Mule Deer Numbers

See response to Issue 7-5.

24-11 Issue: Domestic Sheep

The term "livestock" as used in Summary Table 1 of the DEIS is used to mean both cattle and domestic sheep.

24-12 Issue: Protection of Riparian Habitat

See response to Issue 5-15.

24-13 Issue: Maintenance of Aspen Stands

Grazing Treatment 1, DEIS, page 1-8, was designed to perpetuate reproduction of aspen. In those allotments where this treatment is applied, it is anticipated that aspen stands will be maintained. The effects of this treatment will be monitored and adjustments made accordingly. Fencing of individual aspen stands may develop through CRMP. See discussion of CRMP in the beginning of the Summary in the FEIS.

24-14 Issue: Protection of Stream Habitat

See response to Issue 5-15.

24-15 Issue: Protection of Wildlife During Treatment

Vegetation manipulation treatments will be developed through the CRMP process (please see CRMP discussion at beginning of the Summary in the FEIS) and specific projects will be proposed at that time. Site-specific environmental assessments analyzing the impacts anticipated on wildlife and their habitat will be completed at that time. Mitigating measures will be applied prior to on-the-ground treatments. Also see Standard Operating Procedures on DEIS page 1-32, 1-38 and 1-39.

24-16 Issue: Potassium Nitrate Poisoning

Adverse impacts to wildlife resulting from toxic accumulations of potassium nitrate in some species of vegetation will be analyzed once specific spraying projects are proposed. Such projects will be developed through CRMP (see CRMP discussion at the beginning of the Summary in the FEIS).

24-17 Issue: Bighorn Sheep Reintroduction

This agency and the Nevada Department of Wildlife have identified areas with suitable habitat for bighorn sheep and also the reasonable numbers which could be supported in these areas once reintroductions have taken place. Priorities for releases vary. The Jackson Mountains are second in the State (California bighorns). Other areas are of lower priority. It is recognized that priorities may change as intensive livestock grazing systems and other activity plans are implemented and vegetative responses occur.

Comment Letter 25

Star Route Box 143
Ginnemucca, NV 89415
April 1, 1981

Bureau of Land Management
Ginnemucca and Reno

Our reading of the Paradise-Denio Grazing Environment-1 Impact Statement has shown us many mistakes and omissions in your Impact Statement. We are listing some of the things which need correcting here.

The Study Area Map has only 2 of the ranches and farms around the Jackson Mountains. There are nine more places. Also it was a surprise the BLM needs over 40 years of proposed action improvements before this area can support less grazing animals (214,785) than it does now (238,836). Now, the ranchers can afford to raise cattle here but the unnecessary cuts in your proposed action would easily change that. Under your No Action Alternative you stress wild horses will continue over grazing and the BLM could do little about it. Isn't it time the government becomes responsible to the taxpayers and quits using BLM employees to gather wild horses. Gathering horses and hunting deer are both ways of preventing overgrazing of wild animals. The difference being the person gathering horses must have enough knowledge of wild horses to gather them alive and not injured. Many old-timers and ranchers of this area know both the horses and the terrain. Let them gather the horses. It is the cheapest and most successful way. If the horses must be returned to the government, the Dept. of Health and Welfare should buy them. We hear of the starving and the necessity of school lunch programs. To waste the abundance of horses on the idea Americans won't eat horse meat is sinful. They have eaten and enjoyed it many times in the past.

25-1 | Your maps have many mistakes and omissions. Not all of the deeded land in the Jackson Mountains is shown on your map. The proposed fences on the map of Proposed Action would have no benefit to the ranchers. Spring and summer fences placed where the ranchers want them could be useful. The fence on top of the mountain would be hard to keep in good shape and building it could make pickup travel on the mountain easier. A pipeline out of Donnashea would be better than a wall. The northern Jackson Mts. has no wild horses. Why are you planning to use this area for horses? It doesn't ^{5/26}right to give up land to horses when you are reducing their numbers. The Existing Map doesn't show these fences: Trout Creek-Willow Creek boundary, Happy Creek boundary, field at Boille Creek and Sweeney Field, around these ranches; Mary Sloan, Deer Creek, Willow Creek, Trout Creek, and Meyers farm. In the past all of us have shown the BLM people where and what kind of water conditions are in the Jackson Mt. This map doesn't show all the windmills, troughs and reservoirs. Please include these on future maps; Smokey Spring, Red Butte, Hot Spring, Donna Shea, Fish Pond, Eliza Canyon- reservoirs; Salt Well, Winter Camp and Gavica Wells; Smokey Spring, Fox Farm, Brush Basin, Railroad Spring, Nobel Spring, Woodcamp, South Spring, Hot Spring, New Years Canyon, White Point Spring, Rattle Snake Spring and Black Canyon- troughs; Hard Pan, Winter Camp, Corbeal, North Bottle Creek butte, Presnol, Hidden Flays- windmills.

Comment Letter 25

25-2 | On your map of Habitat Conditions your excellent fishing streams dry up to the mouth of the canyon in the summer. Big Creek doesn't have fish and a cloud burst hurt fishing in Jackson Creek a few years ago. Bottle Creek has some fishing. Not as good as before. The land is privately owned as far as the narrows around Bottle Creek. Fishermen should be told about this.

After you introduce the big horn sheep into the Jackson Mts. keep away from them. Government employees flying or driving around push cows down from the good feed on the mountain to the flat. If you are really interest in improving the range this doesn't help you either.

This area should never have considered for a wilderness. Airplanes and airforce jets overhead, roads and mining dumps, and all the ranches and farms can be seen from the mountain.

This letter should show you how concerned we are with the management of the Jackson Mts. the Black rock Desert and Desert Valley. This is the land that has supported our family for generations. We don't abuse it. It has taught us much more than you have tried to show in this Impact Statement, and we have tried to share this knowledge with you. Please use the ideas the ranchers here give you. Years of learning, not just a few, have formed them.

Tim and Margarita DeLong

Response Letter 25

25-1 Issue: Map Discrepancies

See response to Issue 12-1.

25-2 Issue: Fishable Streams

See response to Issue 12-3.

SMITH & GAMBLE, LTD.

ATTORNEYS AT LAW

JULIAN C. SMITH, JR.
DAVID R. GAMBLE
WAYNE S. CHINARUSTI

April 1, 1981

808 NORTH DIVISION STREET
CARSON CITY, NEVADA 89701
TELEPHONE (702) 683-3800

Mr. Ed Spang
State Director
Bureau of Land Management
300 Booth Street, Room 3008
Federal Building
Reno, Nevada 89509

Dear Ed:

I attended the Public Comment Hearing in Winnemucca on March 11, 1980, on the Paradise-Denio EIS. In reviewing the EIS, I note that the BLM claims that the 1978 range surveys are "the best information available" for determining the carrying capacity of the range. In view of your commitment to monitoring and in view of the startling results that Resource Concepts has uncovered in the Caliente resource area and various other areas throughout the state, it would seem inappropriate to place so much reliance on range surveys that appear to be shown faulty whenever submitted to close scrutiny.

26-1 The Paradise-Denio EIS also appears to advocate monitoring and forage allocation adjustments based on the coordinated resource management and planning process. From reading the EIS, however, I was unsure if the various alternatives proposed implementation of livestock reductions based on the range inventory as a prerequisite to coordinated resource management and planning. I asked this question of Frank Shields after the hearing, and he confirmed that it was his intent and understanding to impose the livestock grazing reductions outlined in the preferred alternative as a basis upon which coordinated resource management planning would be initiated.

It is my view that if the BLM intends to force the range inventory results on the coordinated resource management and planning committees that the entire process would be doomed. This type of approach to coordinated resource management planning in the Winnemucca District can only further alienate the Bureau of Land Management from the permittees. As a case in point, Pine Forest Land and Livestock Company, having permits in the Pine Forest in Paiute

Mr. Ed Spang
April 1, 1981
Page Two

Allotments is looking at 76% and 86% reductions in livestock grazing. This ranch has been using the public lands for grazing since 1918 in the same family. The deer herds, antelope herds, chucker population and sage grouse population have all been on a substantial increase in the past 20 years. According to Frenchy Montero, the range conditions and weaning weights have substantially improved over the past 20 years. In spite of this, the range inventory through application of the suitability criteria has determined that nearly 100,000 acres of the 124,000 acre Pine Forest Allotment is unsuitable for livestock grazing. It would be easier for the BLM staff to convince the Montero's that the world is flat than it would be to convince them that 100,000 acres of the 124,000 acre allotment is unsuitable for livestock grazing. To force them to accept that as a data basis for the initiation of CRMP is absurd. We discussed this in our March 17, 1981, meeting. At that time, you indicated that you didn't intend for the grazing reduction to be a prerequisite to CRMP. I haven't heard yet if Mr. Shields has received that information.

The Paradise-Denio EIS, as well as the Caliente EIS, fails to analyze one of the most obvious alternatives. The alternative of maintaining livestock grazing at the present levels, initiation of monitoring and implementation of range improvements in areas shown to have the greatest need through monitoring is simply not analyzed. I would hope that in future EIS's being prepared by the BLM this alternative will be addressed. As you know, NEPA does not require you to analyze the obviously impractical alternative. In my view, the analysis of the maximizing wild horse alternative falls in this category. To implement this alternative would be beyond the intent of Congress in adopting the 1971 Wild Horse and Burro Act, and definitely beyond the authority of the Bureau of Land Management.

If coordinated resource management and planning can be undertaken on the Pine Forest Allotment without the prerequisite that the 1978 range inventory be accepted as valid, then Pine Forest Land and Livestock Company, Inc., would like to initiate CRMP on that allotment. It would seem to me that a logical unit for CRMP would be the entire Pine Forest mountain range. This would involve Woodward's Ranch, Big Creek Ranch and Alder Creek Ranch, owned by Frank Pendola, and Knot Creek Ranch. We have not discussed with these other ranchers the prospect of joining in a CRMP planning unit.

Comment Letter 26

Mr. Ed Spang
April 1, 1981
Page Three

I am advised that Richard Drake of the Knott Creek Ranch drained Knott Creek Reservoir as a result of a disagreement with local BLM authorities.

I also note that the Paradise-Denio EIS calls for extensive utilization of Big Onion Reservoir as a recreation site. I am curious if Frank Pendola has been consulted concerning these plans. It seems that BLM's approach to fostering recreation in the Pine Forest area is resulting in a net loss of recreational facilities. The closing of numerous roads, including the road to Blue Lake, to create "roadless areas" and other high-handed management decisions by the local BLM managers, could have devastating effects on the total recreation potential of the area.

Another case in point concerns Leonard Creek. The EIS proposes reduction of livestock grazing by Pine Forest Land and Livestock Company of 76% with one of the potential benefits being enhancement of the fisheries along Leonard Creek. The EIS also recognizes that 14 miles of the 20-mile length of Leonard Creek are privately owned. Essentially all of that 14 miles is presently open to fishing and other recreational activities by the general public. The net result of reduction of 76% of the livestock on the public range can only result in an intensification of the use of the private lands. There is absolutely no question that the total private lands of Pine Forest Land and Livestock Company will be fenced and the public excluded therefrom if the BLM persists in such a drastic reduction in livestock numbers.

The Pine Forest mountain range is an area that cries for CRMP, but it can only be successful there if the BLM starts with an open mind and uses the available data and not the faulty range inventory.

Best personal regards,
SMITH & GAMBLE, LTD.

Julian C. Smith, Jr.

JCS:nat

cc: Frank Shields

Response Letter 26

26-1 Issue: Implementation of the Range Survey

Implementation of the 1978 Range Survey will not be a prerequisite to CRMP. However, the Range Survey does contain information which may be helpful in developing a monitoring program. See discussion of CRMP at the beginning of the Summary in the FEIS.

--5-81

Bureau of Land Management
District Manager
Nunnawaco, Oregon

Subject - Comments on BLM-Parade EIS
Location

The BLM-Parade EIS is a document which is easy to spot as one written by bureaucrats. People with formal-union who have no idea what they are writing is all about.

The EIS would give a person who had no knowledge of the area the idea that it would solve most of not all the problems along with making the area a much more desirable place to hunt, fish, camp and so whatever else the BLM decides is an important one. Perhaps this is what it is intended to do.

Unfortunately, this is the real world and all major impact must be advised regardless of how unimportant they may be to the BLM. The impact caused by joining of private lands was not even recognized much less advised.

This could be caused by joining ranches to former private lands in order to produce additional feed to make up for lost AUM's.

Joining of private lands in the Paradise Bone area would result in eliminate the most desirable joining

and camping resources from private use. It could eliminate access to many other areas in public land. Especially the horses and areas the EIS is trying to protect could be done most damage by any action which could result in the joining of private lands.

Other resources should be in an area of major concern. But BLM has no control over the water. How does it intend to be able to water the water? What if the ranches are forced to share resources to produce additional feed to make up for lost AUM's?

27-1

The proposed livestock rate are based on two assumptions. First, the 1978 survey shows the most questioning one of the largest gaps in need but that was not taken into consideration. Secondly, the method of determining trend (one person share observations) makes it no surprise that the most majority of allotments show a downward trend. Why wasn't this indicated prior in the public and private sector manual of this area? To be the method used? Why wasn't David Graham asked how it became that is the only accurate way to determine trend?

I have no arguments about the need to protect public lands resources. The designated experts are using a shirking and not better information to make their decisions.

In summary the EIS is a document with little or no value. The errors and omissions reflect the quality of work that went into it. It is unfortunate that the language of the nation received as little value for their money. They deserve better.

Sincerely,
Don Jones

Response Letter 27

27-1 Issue: Range Survey

See discussion of CRMP at the beginning of the Summary in the FEIS.

Comment Letter 28

April 1, 1981

Bureau of Land Management
Winnemucca District
705 East 4th Street
Winnemucca, NV 89445

Re: Paradise-Denio Environment Impact Statement

Dear Sirs:

We would like to be on record as objecting and protesting to the draft EIS. We feel that the survey, the study, the findings and the proposals are not necessarily correct.

28-1

First, on page 1-1, the FLPMA states that the "lands and their resources are periodically and systematically inventoried". To us, one survey conducted in 1978, an unusual year, does not constitute a periodic or true inventory. Certainly the trend of these areas should be considered if intelligent theory or management is to follow. As long-time permittees in one area, we object to having had no input in surveys, findings, improvements, or proposals in this draft.

The Range Suitability Criteria used is probably the biggest mistake made in this draft. None of the RSC were specifically determined for this particular area and what is true, for example, at Squaw Butte in Burns, Oregon is not necessarily true at Golconda in Humboldt County, Nevada. Consideration of slope and distance from water are affected by other factors such as weather and accessibility. Productivity did not consider annuals and other vegetation known to be consumed by animals and are of more importance than the perennials in this area. Much of the productivity of these lands is determined by soil chemistry which we fail to see considered in any depth. According to Table 2-2, page 2-5, a total of 32% of these vegetations in this EIS area grow in alkaline soil, which will improve little under the very best of growing conditions as shown by the railroad rights-of-way which have been fenced for many, many years.

Another point we find completely overlooked is "natural" fires (as opposed to controlled burning). These areas are subject

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BLM
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to frequent electrical storms and man-caused fires, and one year could completely wipe out any results that might have been accomplished and completely change the short and long-range planning. Other results of "Mother Nature" have not been considered as well; such as drought (similar to the one prior to 1978) or cloudbursts causing erosion; both are prevalent here.

28-2 In our particular area, two BLM improved springs are not included. One is marked with a very large sign as being BLM; the other was totally developed by the BLM and has all the signed agreements on record. Neither one is on the master map.

28-3 Another blunder concerns wild horses. In Table 2-8, it is estimated that 1980 there were 30 wild horses in our area; this area was designated wild horse free in 1971 and remains so today.

If trend has not and is not to be considered, we fail to see where the draft shows a need for any of the proposals, and should the proposals be implemented, that any of them would be successful in increasing production.

In conclusion, we feel the study is in opposition to reality. This is a basically desert type area that has producing revenue for close to 100 years. The draft proposes drastic reductions in that revenue for the next 42 years in its futile attempts to make the vegetation, soil, and terrain into something that can never be accomplished. Summing up, this draft is written proof that you, the BLM, don't even know the territory or anything that comes with it.

Sincerely,

PINSON and PETTIT RANCHES



(Mrs.) JO CHRISTISON
Owner

JC/dsc

Response Letter 28

28-1 Issue Range Survey

See discussion on CRMP at the beginning of the Summary in the FEIS.

28-2 Issue: Spring Identification

See response to Issue 12-1.

28-3 Issue: Wild Horse Numbers

The data shown in Table 2-8 were correlated prior to the 1980 inventory of the district, and therefore estimates of wild horse numbers were made for each area. The 1980 inventory of the Osgood Mountains area showed that there were 25 wild horses utilizing the area.

4/6/81

Frank C. Shields Dist Manager
705 E. 4th St.
Hammonton New Jersey 87945

Dear Frank,

I have perused your review of the Draft EIS for Pine Barrens and find several items of interest:

1. On summary Table I I question all the attention given to Onion Res. If it weren't for private funds the Res. would not be a reality. Also, there is a gentlemen's agreement, a certain level of water has been left in the Res for fishing, boating & etc. I feel an alternative would be appropriate considering no Reservoir. Also, benefits against livestock degradation.

29-1

2. On summary table I can't. Maximizing livestock will have little or no effect on sign grouse & quail increasing or decreasing. This really needs to be addressed with best & wildlife on season and limits. Some of their methods caused stand some questioning.

29-2

3. I liked the term "hacker health" It is an unfortunate description, I don't see Minnie's Health, B&H Employees health etc.

29-3

I also feel that the No livestock grazing economic impact is way off. About 1500⁰⁰ on Q&H + thousands decrease in value of property by loss of Q&H's

The University did an economic impact study for them & I believe the Bureau used these figures. Their study was only the immediate impact & that, long range. The University has hoped to do a more thorough study plus alternate methods of income but has not had a request to do so.

29-4

I strongly feel there is hope for all of us thru CRMP. I also hope we don't make so fast we don't cover all bases.

The one thing that comes through very strongly is that all interest groups want very much the same, "To make the best of what we have to work with."

I feel there are several errors through out the Draft. but will not state them. through our CRMP plan we should be able to mark these errors out

Sincerely,
Jimmy Elger

P.S. Please excuse my understanding stationery

29-1 Issue: Impacts to Sage Grouse and Quail

Summary Table 1 in the FEIS reflects an anticipated increase of 50 percent in the sage grouse and quail populations under the "Maximizing Livestock Grazing" alternative. Impacts resulting from implementation of this alternative are analyzed in the Wildlife section of Chapter 3 in the DEIS.

29-2 Issue: Rancher Wealth

The term "rancher wealth" refers to the value that has accrued to BLM AUMs as a result of grazing fees which have traditionally been lower on public range than on private. Because this fee is lower, ranchers have been willing to pay more than the original AUMs' cost for the opportunity to graze on federally managed range. As a consequence the grazing permit has acquired a market value that contributes to the capital and credit structure of ranches because the permit may be sold in the market place or used as collateral for loans. Use of the term is in accordance with Washington office and Nevada state office guidance.

29-3 Issue: Ranch Value

Correspondence with a number of brokers dealing with the sale and purchase of ranch properties as well as the Federal Land Bank, indicates that the value of BLM AUMs in northern Nevada ranges from \$25 to \$60 per AUM with an average value of about \$50 (Palk 1980).

The overall value of a ranch can be estimated in terms of the herd size (number of animal units) that it can support on a year-round basis. In Humboldt County, ranch value averages about \$1,500 per animal unit (AU). This value includes the ranch's investment in land, equipment and buildings as well as its BLM AUMs. The loss of all its BLM AUMs does not reduce the ranch's investment in these other resources. Because the ranch retains the capacity (land, equipment, and buildings) to support its original herd size on its base property, and because a ranch has a number of options regarding the acquisition of alternative sources of feed (e.g., private pasture rental or lease, development of additional forage on base property or purchase of hay), it is not possible to predict the decline in ranch value which would be incurred from the loss of BLM AUMs. Approaching the rancher wealth analysis in terms of an animal unit basis was discussed during the preparation of the draft EIS. Although reduction in BLM AUMs definitely affects the animal unit support capacity of a ranch, for the reasons discussed above it was decided that the decline in ranch value could most accurately be reflected in the loss of the value of the BLM AUMs themselves. The economic analysis of the No Livestock Grazing Alternative estimated that 50 ranches, 75 percent of the ranches with BLM permits in the EIS area, would have the greatest probability of ceasing operation. While these ranches might cease operation, their fixed resources (land and improvements) would not be idle. Other ranch firms, agricultural investors or nonagricultural investors would buy the real property and continue to use it in ranching, farming, or develop it for nonagricultural uses. Changes such as these could even increase the land's value.

29-4 Issue: Role of CRMP

See discussion of CRMP at the beginning of the Summary in the FEIS.

Natural Resources Defense Council, Inc.

25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108

415 421-6561

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212 949-0049

April 6, 1981

Frank Shields, District Manager
Winnemucca District
Bureau of Land Management
705 East 4th Street
Winnemucca, Nevada 89445

Re: Draft Paradise-Denio Grazing Environmental Impact Statement

Dear Mr. Shields:

I have reviewed the above-captioned draft environmental impact statement (EIS) and wish to submit the following comments on behalf of the Natural Resources Defense Council, Inc. (NRDC).

As you may already know, NRDC, a nonprofit environmental membership organization, has long been concerned about the management and current conditions of the publicly-owned rangelands in Nevada and other western states. We believe that adequate range EIS's are the key means by which the actions necessary to improve current conditions and achieve multiple use management can be identified and their implementation supported.

The draft EIS reveals that a number of serious management problems exist in the Paradise-Denio Resource Area. These include lack of any season of use restrictions, over obligation of available vegetation, and conflicts between livestock use and wildlife, riparian and recreational resources. It also reveals that, as the result of these and other problems, the publicly-owned resources of the area have been, and are being, adversely impacted. For example, 84% of the lands are in poor condition and riparian areas have been severely degraded.

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Paradise-Denio EIS
April 6, 1981

Page 2

Obviously, prompt changes in existing management are needed in order to remedy the problems and improve the conditions.

The proposed action which is addressed in the EIS contains some features which appear responsive to existing problems, including, for example, the long-overdue establishment of seasons of use and necessary reductions in livestock numbers. It is clearly not a multiple-use plan, however. Moreover, the alternatives to the proposed action which are considered in the EIS were clearly not properly selected. Because of time constraints, these comments will deal principally with these two issues.

30-1

According to the EIS, the proposed action will, if implemented, increase livestock forage by 86% while improving range condition by only 13%. This will be accomplished through the expenditure of more than \$9 million in public monies. In fact, the true costs of the proposal are probably higher since 1980 prices were used. P. 1-12.^{1/} Such funds are even less likely to be forthcoming today than they were when this proposal was originally developed. More importantly, virtually

30-2

all of these funds will admittedly be spent for the sole benefit of livestock. Pp. 1-12, 1-13. The EIS not only fails to justify this massive subsidy for the livestock industry, but also the manner in which the needed funds will be expended.^{2/} It does reveal, however, that these expenditures will come at the expense not only of the public treasury, but

^{1/} All page references are to the draft EIS.

30-3

^{2/} The EIS does provide the criteria used to determine the priorities for AMP development and implementation. Table 1-6, p. 1-14. It does not, however, apply those criteria to the allotments. The final EIS should do so in order that members of the public may evaluate the manner in which the BLM proposes to use their money.

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April 6, 1981

Page 3

also of publicly-owned resources and values, including wild-life, riparian areas, water quality and cultural resources. See, e.g., Summary Table 1. This manifest bias toward livestock use appears to be a clear violation of the Bureau's multiple-use and stewardship mandates.

The alternatives to this proposal which are considered in the EIS appear to have been designed to justify the proposed action. In any case, although the alternatives, including the proposed action, contemplate several different levels of livestock use, they certainly do not include all reasonable alternatives or encompass the range of alternatives reasonably available as required by the National Environmental Policy Act of 1969 (NEPA). See, Council on Environmental Quality, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, 40 C.F.R. Part 1500 (1978), §§1502.14(a), 1502.2(e) (hereinafter CEQ Regulations).

The EIS purports to consider four alternatives to the proposed action: no grazing, no action, maximizing livestock, and livestock reduction/maximizing wild horses and burros.^{3/} See, e.g., Summary Table 2. Consideration of three of these alternatives--no grazing, no action and maximizing wildhorses and burros--is required by NEPA. This fact does not make them realistic alternatives, however. For example, although no one could reasonably expect the Bureau to eliminate grazing entirely in the Paradise-Denio Resource Area, analysis of this alternative is necessary to provide essential baseline information against which to compare all the alternatives involving grazing, including the proposed action. Similarly, given the environmental degradation which has resulted from existing management, or the lack thereof, as well as the

^{3/} In fact, the so-called maximizing wild horse and burro alternative contemplates reducing their populations by 65%. It has obviously been misnamed.

99
Comment Letter 30

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April 6, 1981

Page 4

Bureau's affirmative statutory duty to improve current conditions for all range resources, it is plain that the no action alternative also is not a realistic option.

At best, the EIS provides a choice between the proposed action and maximizing livestock. In fact, however, the only difference between these two options is that the latter involves even more vegetation manipulation for the sole purpose of increasing livestock forage than does the proposed action. Table 1-20, p. 1-35.^{4/} Stocking rates, areas of use, utilization levels and all other management actions are identical.

Even in the unlikely event that the necessary funds were available, the proposed action with or without more vegetation manipulation unquestionably does not constitute the only reasonable option for management of the publicly owned lands and resources in this area. There are other alternatives. NEPA itself, the CEQ regulations and case law plainly demonstrate that the Bureau is under an affirmative mandate to seek out and evaluate these options in order to comply with the most important aspect of the entire EIS process--i.e., the consideration of alternatives. Clearly, that duty has not been met in the preparation of this EIS.

^{4/} Only a few criteria for the selection of areas to be treated are supplied. They involve sage grouse, raptors and riparian areas. See, p. 1-38. While we support these criteria, we believe that additional ones are necessary. They include: 1) treatments will be proposed only in areas that would not be expected to respond to grazing systems; 2) treatments will be proposed only in areas having conditions (soils, climate, precipitation, etc.) which are suited to a favorable response within 3 years; 3) treatments will not be undertaken in known critical wildlife habitats, unless made in accordance with an approved habitat management plan for the area; and 4) all treatments must be cost-effective and demonstrably designed for multiple uses, not single use. Because decisions to engage in land treatments are essentially decisions to allocate the lands involved to livestock use, the criteria must be incorporated in the land use plan.

30-4

Comment Letter 30

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April 6, 1981

Page 5

30-5

In order to remedy this fatal deficiency, we submit that the final EIS must include a genuine, fiscally realistic multiple-use alternative which does not rely on extensive land treatments for livestock forage production and which will, at a minimum: a) protect and enhance all of the area's deteriorated riparian resources as required by the Bureau's wetland-riparian area guidelines; b) protect and enhance critical wildlife habitats; c) incorporate different--i.e., lower--utilization levels on areas in poor condition as well as different seasons of use and other features which can reasonably be expected to produce improved range conditions; d) eliminate or reduce livestock and other grazing use of unsuitable lands; and e) ensure that future management actions address the areas most in need of attention first.

Thank you in advance for considering these comments. We hope that they will be fully addressed and incorporated in the final EIS.

Sincerely,

Johanna H. Wald
Johanna H. Wald

JHW/am

P.S.--The final statement and any future correspondence should be sent only to NRDC's San Francisco office.

Response Letter 30

30-1 Issue: Relationship Between Vegetation Condition and Vegetation Production

See response to Issue 5-2.

30-2 Issue: Benefits from Range Facilities and Land Treatment

See Errata - Chapter 1.

30-3 Issue: Allotment Management Plan Implementation

See response to Issue 5-11.

30-4 Issue: Evaluation of Land Treatments

It is standard policy that environmental assessments and cost-effective analyses be completed for all land treatments prior to implementation of those treatments. The need for land treatments and range facilities will be established through the CRMP process (see discussion of CRMP in the beginning of the Summary in the FEIS).

30-5 Issue: Need to Consider Alternatives

See response to Issues 5-22 through 5-35.

Comment Letter 31



United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102

450 Golden Gate Avenue Box 36062

PSW 2200
DES-81/5

Memorandum

To: District Manager, Bureau of Land Management, Winnemucca District, Nevada

From: Assistant Regional Director, Grants Assistance and Environmental Services Divisions

Subject: Review of draft environmental statement for proposed domestic livestock grazing management program for the Paradise-Denio Resource Area, Humboldt and Pershing Counties, Nevada

We have reviewed the subject document and offer the following comments for your consideration.

General Comments

We support adoption of the proposed action as it relates to improvement of water quality of the North Fork of the Little Humboldt River and improvement of recreational opportunities in the Onion Valley Recreation Area.

Since the North Fork of the Little Humboldt River (from the reservoir at the Little Humboldt River confluence to the source) has been included in the Nationwide Rivers Inventory, we encourage efforts to improve water quality, reduce sedimentation, and enhance fishery values.

Improved recreational opportunities in the Onion Valley Recreation Area, resulting from fencing and exclusion of livestock grazing from campgrounds and fishing areas, are also encouraged. Site-specific planning to improve campground and fishing facilities should be coordinated with the Nevada Division of State Parks.

31-1

Predicted impacts to potential National Natural Landmarks, identified during the scoping process by this Service and the Nevada Division of State Parks, are not specifically addressed in the subject document. Significant natural areas should be identified and predicted impacts, including changes in vegetation and erosion, should be addressed.

James R. Miles

31-1 Issue: Potential National Natural Landmarks

In your scoping document letter dated April 3, 1980, your organization stated that a portion of the proposed Black Rock Desert National Landmark may be in the resource area. A very small part of the proposed landmark is so located, but there would be no conflict between grazing and the purpose of the proposed landmark to highlight the vast alkali plays. This was the only potential national natural landmark that was discussed in your letter.

WHOA!

BOARD OF TRUSTEES
DAVID R. BELDING
JACK C. McELWEE
GORDON W. HARRIS
BELTON P. MOURAS
GERTRUDE BRONN, Honorary

WILD HORSE ORGANIZED ASSISTANCE
INC
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P O Box 555
Reno, Nevada 89504
Telephone 321-5908
Area Code 702

In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

April 3, 1981

Mr. Edward F. Spang, State Director
Department of the Interior
Bureau of Land Management-Nevada State Office
300 Booth Street
Post Office Box 12,000
Reno, Nevada 89520

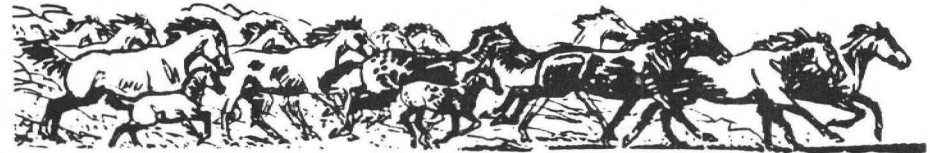
Re: Paradise-Denio Grazing Environmental
Impact Statement

Dear Mr. Spang:

Thank you for the opportunity to comment on the Paradise-Denio EIS. The Bureau is to be commended for the collection of data that pinpoints site specific problems in the current management practices of the public rangeland resource. The Paradise-Denio document is substantially reduced in size from previous statements, therefore WHOA! expected to immediately plunge in and extract the necessary information that applies to our interests and then comment upon them. During this process we found that the DEIS contained little more than an estimated population of the total population of wild horses and very little information that substantiated the proposed action and alternatives. We had to fall back on the MFPs, believing the rationale would adequately address our concerns with the DEIS, they did not, so we went further and requested the URA for the background on inventories and data that provided some clues for the DEIS proposed action. Our conclusion, based on review of the URA, the MFP I & II and the DES, is that the DEIS identified a significant adverse impact on wild horses and burros. The document does not analyze, in sufficient detail, those impacts; therefore you should prepare an additional environmental statement on wild horses and burros as well.

32-1

In as much as the URA provided the data for compilation for the DEIS, we have added our comments to the URA, attached to a copy of the Paradise-Denio URA and want those made a portion of our comments on the total Paradise-Denio DEIS. The comments that follow address our view of a totally negative, exceedingly deficient document, that if implemented will violate not only specific laws--but Bureau policy and regulations as well.



Comment Letter 32

URA

1. WHOA! requested the URA which would include pertinent data upon horse and burro inventories and habitat relating to the data on page 2-17 (Table 2-8) of the Paradise-Denio Draft Environmental Impact Statement. We have number the pages of the URA (attached) because we received what looks like only a portion of what was a larger document. We request the following, the URA copy be reviewed as our total comments for the Paradise-Denio DEIS.

Page 1, Table 1 & 2

No statistical procedure is available which will make data collected under different conditions comparable. 1/ The degree of error with aerial inventories is completely unacceptable when the purpose is to calculate rate of increase. 2/

Relatively simple tasks involving collected inventory data--birth rate/death rate. 3/ Example: the 1st inventory may be collected late summer (August), which would give adult/foal ratios; the second inventory could then be done in mid-winter (February) that would give adult/yearling/foal ratios, the latter would give an estimate of natality for the year in question and an estimate of mortality for that portion of the populations. This technique need not involve expensive nor time consuming efforts, but a simple observation (spotting scopes) on a sample population; which could be used resource-wide. The use of life-tables provides the Bureau with the most promising method of determining mortality in the populations. Once the mortality/natality has been collected, the rate of increase can be determined by comparing this data with the total number of animals present. Aerial inventories can be compared with young/adult ratios, every year--twice a year, to identify and minimize the known biases that exist in any one method. These activities would not increase man hours or travel time if collected when personnel were in the field for all other range purposes. One would surmise that high standards would have predicted this practice for the wild horses specialists for the past ten years.

Page 1, Table 2

The paragraph indicates the Jackson Mountains are divided into two areas does the Table 2 reflect that or is it only one of the areas?

Footnotes

- 1/ Wildlife Society, 1963, Wildlife Investigational Techniques, 2nd Edition, pg 93. Edward Bros., Inc. Ann Arbor, Michigan.
2/ Graeme Caughley 1974, Bias in Aerial Survey, Journal of Wildlife Management, 32 (1) January 1979.
3/ Must be done slightly before or after peak foaling season for comparability.

Comment Letter 32

Page two-UEA

Page 2, paragraph 1

Does this vegetative data apply to page 1, the Jackson Mountains or to the Krum Hills in Table 12? Although inventoried in 1977, the season of inventory was not noted, thus comparison with the other data is questionable.

Page 3, Table 14

Since 'juveniles' again is not specific; we must assume the District explanation must apply here as well. 4/ Question, was there no foals born in 1974 and 1975? You cannot compare the 1974, 1975 and 1977 data. (refer footnote 1 & 2) When was the count done in 1977?

Page 4, Table 16

(refer back to page 2, table 12) Since horses are known to interchange among the Bloody Run, Slumbering Hills, Blue Mountains and Krum Hills and since the season of inventory was not given--being nearly identical--could this in fact be the same horses, inventoried in other areas at different times? Is the District treating these as two distinctive herds or does the District propose two options for the same band?

Page 5, Table 18

The URA gives no inventory data as referred to in the 39% and the 61% herd use areas. Please explain why these previous years inventories were not included, if available, in this URA? Does the URA imply the 'average overall' of all recent inventories, mean the information in Table 18 is verifiable? How did you determine the use area and what is the justification for utilizing these percentages in computing a portion of the population for Table 19?

Page 6, Table 8

Again the discrepancies of seasons defy any legitimate use of comparison. Why was Golconda Butte the only area inventoried in 1977 in this area and what was the season and type of inventory?

While it is true Caughley studies verified discrepancies in surveys it also stated it could vary from 29% to 88% (Caughley, 1977). Why should the District take the maximum upon which to base population estimates?

Footnotes cont.

- 4/ Paul Jancar-personal communication 3/81; "juveniles are those animals not adults, but not born the current foaling season."

70
Comment Letter 32

Page three-URA

You should develop sound techniques for verifying accuracy of your censusing for each herd unit. Sample herds of mortality/natality, life tables, type of aircraft, season of inventory, experience of pilot, and counter are all factors that build credibility into the Bureau's data.

Based on the unknowns cited in the URA, the general confusion and misunderstanding (population condition, season of use, migration, etc.,) it is not surprising the proposed action in the DEIS is unsound. Your 'best available' information only confirms our claim that reduction and reduction only is the perception of responsibility under PL 92-195.

Page 7, Table 10

What is the basis for establishing nine horses as the estimated population in 1974, when the winter inventory shows 27? How does the Bureau separate horse use from livestock use in order to make a generalization that impact to the wet meadows is from horses? This area does not indicate the portion of public/private land status. The inventory of spring 1977 only shows us the Bureau has abrogated it's responsibility of protecting those animals.

Page 8, Table 12

You indicate the inventory data applies to the entire area, does this mean the entire Slumbering Hills? How does this data compare with Table 16, page 4; given they move from Bloody Run, Slumbering Hills, Blue Mountains, and Krum Hills?

Page 9, Table 13

North and South ends of what? We assume it means the page before (page 8, Table 12)?

Page 10, Table 14

How does the population inventories and estimates compare with page 2, Table 12, where the populations interchange? It does not specify the portion of public lands/private lands for reader clarification. The assumptions and statements in the paragraph following the table are representative of a child's games in that given ten blocks and five are taken away, it is assumed that five are left; when variables such as theft, breakage could alter that end number. Playing such games with wildlife populations is dangerous and amateur. While inventories are not necessary to allocate forage or determine optimum numbers for the resource the importance and significance of an inventory to establish the numbers to be left is essential. The URA admission could substantially alter the populations then in the Lower Paradise, Snowstorms, and the Osgood Mountains. This is not anything close to what is required by law.

Comment Letter 32

Page four-URA

Page 12

What techniques is the Bureau using to separate wild horses and livestock use in this area? No need to repeat scientific methods that could be used. We presume the astericks indicate different inventory counts by the two districts, has either used any methd to verify either? Since the Bureau just reduced wild horses in the Snowstorms, we would surmise that you would have counted the remaining wild horses in that area for future use!!

Page 13

The 1951 surveys and anything previous to 1971 are immaterial to the inventorying, forage allocation or future use of wild horses.. The profound conclusion of this paragraph graphically illustrates our impatience with the Bureau and our arising alarm at Bureau practices. . . .

"There was a roundup conducted by the Bureau of Land Management from August 31, 1977, to November 4, 1977, on this area. One thousand sixty-five horses were gathered in this period of time. It is estimated by field personnel that the present numbers are similar to those that occurred before the roundup."

I would like to know what personnel, what method, the area that was censused, the time of census, and the number counted.
BLM's DEFINITION OF RESPONSIBILITY UNDER PL 92-195!

Someone must review and define policies on how, when, and under what conditions data is to be collected if the Bureau does not want to defend these types of documents before Congressional hearings or the judicial system.

Comment Letter 32

Paradise-Denio DEIS

Summary (111)

The Paradise-Denio draft proposal and alternatives are a poor substitute for the many 'reasonable alternatives' that were not proposed or analyzed in behalf of the wild horses and burros. WHOA! refuses to believe these are the 'best' the District could develop and we challenge you to 'prepare and circulate' an appropriate document, revised draft that complies with the present laws. 1/

Summary Table 1 (1v)

The District is to be congratulated for your strategic placement of this table in that it allows the reader to quickly determine the proposals failure to consider true multiple use. It's one major attraction and common denominator indicates the beneficial results from the 'no grazing' alternative. Although WHOA! has never accepted any proposal or alternative that does not consider multiple use, we never-the-less recognize the past dominant use theories that continue to expouse from within the Bureau, making it quite tempting.

Summary Table 2 (xii)

- 32-2 | It would be useful to know if the DEIS reflects that reduced income from the now defunct inventory tax. The livestock community is complaining about the 'current use' as being economically destructive to the industry and want preference returned; therefore, the 'no action' alternative not only continues the decline of the resource but is a significant impact on the future ability of the range to produce forage for anything. 2/

Summary Table 3 (xiv)

There appears to be little difference between proposed action and the 'maximizing livestock' alternative; suggesting dominant use.

Summary Table 4 (xv)

- 32-3 | Other than water facilities, other resource values will not benefit from the \$9,000, 928 of estimated costs. In addition to the 1500 miles of existing fences, an other 247 miles is proposed. It's not acceptable from an aesthetic point of view and certainly not beneficial for the other wildlifes populations. Any cattle guards placed in horse use areas must be modified.
- 32-4 |

Footnotes

1/ 1502.9 NEPA

2/ Sagebrush Rebellion, McClure Bill

Comment Letter 32

Page two-DEIS

Summary Figure 2 (xvi)

The livestock reductions have been extended from 3 to five years under current grazing regulations, thus full reductions may not become reality until 1987, wherein the incremental adjustments can be appealed at the 1st and 3rd years. In the case where inventory methodology is challenged, the fallback would be monitoring, thus little if no reduction may occur. The DEIS impresses the reader with the 'ideal' rather than reality. In the meantime wild horses, burros, wildlife will under-go substantial reductions in numbers and continued loss of habitat in the case of the latter. The public is led to believe that over-utilization will end with the decision and in 3 to 5 years, the problems impacts upon their particular interest will cease. The DEIS is deficient in emphasizing the assumptions that are applied in order to make the proposals or alternatives work.

- 1) that all proposed actions will be acceptable to the various user groups,
- 2) that costs for range improvements to mitigate the impacts to the commercial users will be funded,
- 3) that funds for monitoring will be forthcoming,
- 4) that sufficient man-power and man-hours will be granted, and that
- 5) no environmental stresses will occur that would circumvent the proposed actions.

Summary Table 5 (xvii)

- 32-5 |
- 1) How can the Bureau believe they are 'improving' the horses' lot through elimination? 3/ Is this is what is meant by 'improving their habitat.' More correctly, it facilitates agency involvement and replaces horses and burros with livestock.
 - 3) There appears to be some conflict with #3 & #8 objectives in that one means the objectives and the other does not. We assume the same erosion, watershed, ground cover and litter would be the same in either.
 - 4) We stearnly object to this statement when the health and productivity of the wild horse/burro is not the basis for this proposed action. The bottom line again, is to facilitate the agency and livestock; for if there were any degree of integrity the District would not have recommended the action. The District is NOT managing wild horses, they are ELIMINATING THEM AND REDUCING THEM! Furthermore the lack of management and the current 'catch as catch can' is encouraging productivity, not the condition.
- 32-6 |
- 5) It is unacceptable that wildlife would take any reduction in numbers or forage allocation. Sage grouse has declined due to a lack of habitat, yet the Bureau proposes to spray 100,000 acres of sagebrush.
 - 7) We fail to understand how the objectives are reached under the proposed

Footnotes cont.

3/ 4700.5 (b) (d) 'excess is not used singly, but in conjunction with entire sentence. 4700.0-6 (c) "where found" 4730.1 (b); 4730.3

Page three-DEIS

action, and not under the maximizing livestock; when there appears to be little difference.

8) Unacceptable. See #3

Areas of controversy

We do not understand why the proposed action was not analyzed as an area of controversy for wild horses and burros. We do not consider nine million dollars economically feasible when opponents of wild horses feel that the expenditures of five million for the entire eleven western states, prohibitive. We find the statements 2 & 3 of the last paragraph to be reflective of the dominant use perception of their 'rights', rather than privileges. We wonder how the various species survived before cattle arrived on the scene.

Purpose (1-2)

1) The grazing regulations clearly define the Bureau's responsibility in making hard and necessary decisions. It is my understanding, having attended CRMP meetings, that managers would "find it extremely difficult to ignore decisions made by CRMP." The CRMP may very well resolve conflicts once a decision has been reached so long as the 'national' interests and concerns are considered and not just local interests.

32-7

2) There are no suitability criteria applied to wild life populations, therefore we question the application for wild horses and burros.

Proposed Action (1-2)

The proposed action does not reflect multiple use theories, but rather supports the dominant use. As nearly as we can ascertain, nearly 125,000 AUMs are available; approximately 81% for livestock, 12% for wildlife, and 3% for wild horses and burros. The 3% is atypical of BLM tokenism. A reduction of 85% of the wild horses and 52% of the livestock, with future allocation of forage of 3% for wild horses and 74% livestock, respectively. In plain English, the wild horses and burros are paying, through removal, for range improvements for which they will not benefit in the future from increased forage production. If the action were equitable and the reduction of horses justified, then they should benefit with appropriate proportions reallocated in the future.

32-8

Please explain why the District can compute cow/calf forage allocations, but cannot compute those same known factors for adult/foal ratios in the allocation of forage for wild horses and burros? Several assumptions could be used that would give the Bureau the "benefit of doubt" such as 1) that all mares foals (which they do not), 2) that all colts survive to enter the adult population (which they do not), and 3) that all foals are born in April (which they are not). Adult population x 12 AUMs + foal population x 2 AUMs = Total amount forage consumed; not the standard practice of charging an AUM for the moment a foal drops to the ground.

Table 1-3 (1-7)

The only notable difference is the 'no amp' for the seven allotments, not very significant considering there are 76 allotments present.

Grazing Systems (1-11)

The hidden purpose of elimination of in the majority of areas 'where they were found' at passage of the Act, and the designation of specific

Page four-DEIS

ranges is the persistent desire by the Bureau to fence the West into tightly controlled management parcels for the betterment of a single use group, all other resource values do not derive any benefit from those fences. It is obvious the complex rest rotation systems are not developed for the benefit of all range users, or they would have reflected that in the planning systems. It is possible to maintain wild horses within these systems as any good range manager realizes but most likely, politically, cannot admit. Wild horse specialists should work with the range conservationists to identify horse use areas, through tagging. If then fences are necessary, which we question, then develop the rotation system by establishing the optimum number of horses that will not exceed the utilization level when that pasture is in rest. The fact that this known system is not even tried is due to unqualified range managers or the continued resistance to accept the horses/burros as an 'integral' part of the natural system. It is apparent the Bureau is incapable of multiple use because of a locked in mentality created by vested interest groups.

Livestock Support facilities (1-11)

32-9

Since your proposal states it will take 5 years @ 850 per year for the reduction of horses, what buffer zone or contingency plan has been developed for the spraying of 2-4D in those proposed areas of eliminations? Or will the Bureau arbitrarily spray anyway? If there are negative impacts to wildlife and stream habitats, then we assume there will be some impacts to the wild horses and burros.

Table 1-5 (1-12)

32-10

How dare the District propose to utilize portions of public funds for the sole benefit of one user group! Perhaps when the Bureau employees start drawing their wages from the livestock industry, then perhaps then you could with little difficulty become their sole servants; but the public lands belong to all the American people, many of whom have no contact or interest in the livestock community--those same people contribute to the Bureau's salaries. If opponents of true multiple use want self-supporting programs then we should start with livestock, predator control, support facilities. What are the average (3 year) intake from grazing fees for the Paradise-Denio and how long will it take to recoup the proposed expenditures from those receipts?

General implementation schedule (1-13)

32-11

What special consideration will be given the wild horses, in those areas earmarked for intensive management systems? Will there be any areas where livestock will start at a lower level than current active use?

32-12

The DEIS does not evaluate the costs, in addition to the nine million, for the removal of 850 horses per year for five years. Furthermore the impact of inflation will greatly alter the impact of those funds have on any specific plan. Therefore the nine million dollars of estimated costs are actually under estimates the costs of Multiple Use!

32-13

Does the DEIS estimate include the additional man hours for monitoring, travel time for these commitments?

Management supervision (1-39)

32-14

We assume some written commitment is forthcoming as to how the effects of horses can be separated from those of livestock? What specific monitoring programs are proposed for monitoring of wild horses and burros?

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- 32-15 | If research or additional information is uncovered on wild horses and burros, then the District will prepare an additional EA for horses, prior to modification; as it does for livestock?
- Administration (1-39)
- 32-16 | Does the DEIS include the costs for monitoring season of use, trespass? The FEIS should state clearly that grazing use above and beyond the authorized use must be determined 'wilful' to endanger grazing privileges, a rarity.
- Table 1-23 (1-41)
- 32-17 | In whose determination is the Owyhee the only area best suited for wild horses? The fact that horses are currently present indicates sufficient portions of their habitat requirements are fulfilled. Furthermore, the Winnemucca District in their statements of increase proves the area is well-suited for wild horses. Why wasn't water development proposed for the Slumbering Hills? Why do the antelope show increases in the wild horse areas?
- 32-18 |
- 32-19 |
- Water Resources
- 32-20 | Please clarify those waters which run northward in the Paradise Denio area.
- Table 2-4 (2-8)
- 32-21 | Why is condition data missing for 2 allotments? Since horse reduction is adversely significant, please explain why the condition in allotments without wild horses are in declining condition?
- 32-22 | Please explain the upward trend in mule deer as compared to the Granite range study which shows dietary overlap within the two species. If horses contribute significantly in Owyhee and it is critical summer/winter range for deer; why are you designating it for the horse population? Are there geographical or habitat reasons why big game is not as prevalent in the other livestock use areas?
- Wild Horses and Burros (2-15)
- There were several factors in the Buffalo Hills die-off 1) severe climatic conditions which prevented horses from getting out of the canyons and 2) improperly supervised gates which allowed access. Yes, forage was depleted; but starvation may not have occurred had the other factor not been present. The Bureau MUST truthfully admit all factors if the Bureau credibility is to surface. The same conditions apply to the use of drought conditions, when in Owyhee during the critical years, there was sufficient water available, but it was fenced off from the horses' access and several pumps on public lands were seen that could have provided relief to the horses----they were shut down! I was witness to all actions and tire of the Bureau using half-truths to justify the actions.
- 32-23 | Have you estimated survival or mortality from a time specific life table based on samples of captured animals? If so, what was the mortality/survival estimate? How did you get it? What time of year?
- Table 2-8 (2-17a)

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- 32-24 | It also should be noted that inventories as data to justify decisions must be made at the same time of year, either before or after foaling and under similar conditions. Discrepancies are the result of 1) applying yearly gross figures, 2) failure to use life tables for comparison, 3) failure to compute mortality/natality, 4) the time of census, 5) the type of aircraft, 5) experience of counter/pilot, and 6) climatic conditions. Those factors can and do vary the results. (Wolfe) It is not necessary to know the exact population in order to determine optimum numbers; the inventory is critical when numbers are to be removed from public lands, leaving the optimum. (National Academy of Sciences)
- Livestock Grazing (2-19)
- 32-25 | If the typical operator is 90% cow/calf operation and there are 100 cows for 72 calves; and there is a death loss overall of 7%--given the preventative maintenance of vaccines, dips, retention of portions on private lands--one would suspect that horses, lacking those protections would be higher. Has this been compared or analyzed? If not, why not?
- Social Profile (2-33)
- If environmentalists have a disproportionate share in the say of decisions, and they are opponents of the livestock operator, as they would like everyone to believe; why are the majority of lands still in declining condition?
- 32-26 | Why is it when ranchers breed their thoroughbreds, its called 'line-back breeding' and when it is wild horses it's called 'inbreeding?' What factors are you looking at that tells you that inbreeding in the wild horses is occurring? We assume the typical features of roman-nose, small stature, etc., are those features believed to be inbreeding. Show me a correlation between inbreeding and those characteristics? It isn't so!
- The horses were recognized by the livestock industry as a commodity for which no grazing fees or taxes were paid, in order to subsidize their own economic picture. Now that it is no longer possible to derive income from this resource, they want them removed.
- Regional (last paragraph)
- Only because the Bureau has done such a remarkable job of hard-selling the public on inflated estimates, rates of increases, unsubstantiated wildlife conflicts, of the wild horses and burros. In our opinion the livestock industry has caused widespread vegetative changes and ecological damage from which the range most likely will never recover and the numbers and costs in comparison with the wild horses and burros are infinitesimal.

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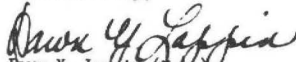
The 1971 population has no basis for discussion in the DEIS or the FEIS when the 1971 figures are highly speculative and largely undocumented. There are no laws, regulations or policies that require its use and in fact instruction memorandums specifically require that 1971 figures not be used.

There are many possible alternatives and mitigation measures that could have been pursued to insure the continuance of livestock, wild-life, wild horses and burros dispersed throughout the Paradise-Denio resource area; the failure to do so properly identifies the predictable sell-out of the public land resources to vested interests.

Our conclusion, based on a frustrated attempt to make some sense of the URA--upon which the DEIS is based, that the document does not analyze in sufficient detail, the impacts of the proposed action and alternative on wild horses and burros; therefore you should prepare an additional environmental statement on wild horses. Furthermore, we will take all measures necessary to prevent this or similar actions from being implemented.

Respectfully submitted.

Most sincerely,


Dawn Y. Lappin (Mrs.)
Director

cc: Board of Trustees
NRDC
Sierra Club
API

Response Letter 32

32-1 Issue: Comments on Paradise and Denio Unit Resource Analysis

A separate letter, under different cover, was sent to Mrs. Dawn Y. Lappin in response to her comments on the URAs.

32-2 Issue: Inventory Tax

Economic impacts from the abolishment of the Inventory Tax are not discussed. The purpose of the DEIS was to only analyze impacts resulting from the implementation of the alternatives including the proposed action. Removal of the Inventory Tax is not proposed in these alternatives.

32-3 Issue: Range Facilities and Land Treatments

See Errata - Chapter 1, corrections to Tables 1-5, 1-17, and 1-20.

32-4 Issue: Modification of Cattleguards

See response to Issue 5-9.

32-5 Issue: Wild Horse Elimination

Wild horses and burros would only be eliminated in areas where management of the animals is not possible because of the large amount of private land intermingled with public land. These private land owners have asked for the removal of the wild horses present. Any further adjustment, if necessary, to wild horse and burro numbers will be based upon reliable vegetation monitoring and/or agreements with affected interests. See discussion on CRMP in the beginning of the Summary in the FEIS.

32-6 Issue: Reduction of Wildlife Numbers

See response to Issue 7-5 and 17-1.

Impacts resulting from vegetation manipulation projects under the "Proposed Action" could have an adverse impact on sage grouse. Overall, impacts to this species resulting from implementation of the Proposed Action in its entirety would be beneficial, and an increase in population size is anticipated. See analysis, page 3-2 of the draft statement, Sage Grouse "summary."

Response Letter 32

32-7 Issue: Suitability Criteria Applied to Wild Horses and Burros

Suitability criteria are not applied to wildlife because of the lack of information pertaining to their application. While suitability was mapped and analyzed in the EIS it will not be used to determine initial stocking rates or proposed numbers. Instead, suitability will be reflected in the monitoring process and subsequent adjustments. See discussion on CRMP in the beginning of the Summary in the FEIS.

32-8 Issue: Cow/Calf Forage Allocation

Within the P-D DEIS all computations of forage allocation were for adult animals in the case of livestock and wild horses and burros. For the purpose of our analysis the amount of forage for one cow AUM was equal to the amount of forage for one horse AUM.

32-9 Issue: Land Treatments In Wild Horse and Burro Use Areas

Vegetation manipulation treatments will be developed through the CRMP (see discussion on CRMP at the beginning of the Summary in the FEIS) and specific projects will be proposed at that time. Site-specific environmental assessments analyzing the impacts anticipated on wild horse and burros and their habitat will be completed at that time. Mitigating measures will be developed prior to on-the-ground treatments.

32-10 Issue: Range Facilities and Land Treatments

See Errata - Chapter 1, corrections to Tables 1-5, 1-17, and 1-20.

32-11 Issue: Relationship Between Intensive Management and Wild Horses

No intensive management systems for cattle were proposed in areas of wild horse and burro use under any alternatives except No Action. Intensive management was proposed for wild horses on herd management areas. As for areas "where livestock will start at a lower level than the current active use," refer to Tables 1-1, 1-10, 1-15 and 1-18 in the DEIS.

32-12 Issue: Cost of Horse Removal

The \$9 million does not include the cost of removal of 850 horses per year. To analyze the alternatives completely, various basic assumptions were made. These assumptions are stated in the DEIS on pages 3-1 and 3-2. DEIS page 3-2, #8, states that wild horses and burros would be removed or reduced within five years. This assumption, along with assumption #13, includes the manpower and funding to complete the proposal.

Response Letter 32

32-13 Issue: Funding for Monitoring

See response to Issue 11-4.

32-14 Issue: Relationship Between Livestock and Wild Horse Grazing

Resource damage caused by wild horses may be difficult to isolate from damage caused by cattle, as utilization by the two is very similar. The objectives are to prevent damage from occurring. If through monitoring (see discussion of CRMP at the beginning of the Summary in the FEIS) overutilization is shown to be occurring then adjustments in management procedures for livestock, wild horses and burros would take place.

32-15 Issue: Herd Management Area Plans

At the conclusion of the land use planning process Herd Management Area Plans (HMAP) will be completed for all areas where wild horses and burros are to be managed. These plans will include an environmental assessment (EA) if reduction in horse and burro numbers is required.

32-16 Issue: Cost of Management

The DEIS did not specifically give a breakdown of these costs. These costs are very difficult to estimate until specific (i.e., by allotment) management objectives are identified through the CRMP process. However, for the purpose of this analysis a general assumption (DEIS page 3-2) was made that the funding and manpower would be available to implement and supervise proposed intensive management systems.

Response Letter 32

32-17 Issue: Selection of Horse Use Areas

This determination was made by the Paradise-Denio Area Manager as a result of the conflict analysis portion of the Management Framework Plan Step II. The following were the reasons that the Owyhee was selected and other areas were rejected.

1. The Black Rock and Jackson Mountains have been identified by the Nevada Department of Wildlife for reintroduction of California bighorn sheep. Bighorn sheep and wild horses may not be in direct competition for forage. However, managing the wild horse gatherings every so many years would involve the use of helicopters, other motor vehicles, capture facilities and the presence of man--which does create serious conflict to bighorn sheep. These two areas are also under consideration for wilderness and are wilderness study units. Wilderness creates a serious conflict for proper management of wild horses with its restrictions on the use of motorized equipment and development of facilities within its boundaries.

2. About 15 percent of the Snowstorm Area is in private ownership and the owner has requested the wild horses to be removed under 43 CRF 4750.3.

The Nevada Department of Wildlife has identified the Snowstorm Mountains as an area for the reintroduction of California bighorn sheep. Wild horses and bighorn sheep may not be competitive for forage, but periodic gatherings will be required to balance the wild horses with the stock rate and this requires helicopters, motor vehicles and men, creating a serious conflict with bighorn sheep.

Management of the various resources is not feasible in horse use areas. Grazing systems are designed for livestock to use the range at certain periods of use and to provide rest and seedling establishment of the vegetation resources, but it is not practical to herd wild horses to follow a grazing system.

3. It is doubtful that seven head of horses in the Slumbering Hills could be considered a viable population or that these animals were present in the immediate locale at the time of the passage of the 1971 act.

4. The Fish and Wildlife Service are in the process of fencing their boundary along McGee Mountain and it is likely the fencing would be completed in the summer. If this is the case the burros would be fenced in the Sheldon Refuge as it is their summer range. If they were fenced out of the Sheldon Refuge, a large portion of their habitat or range would be removed and any area they moved to would be different from that at the passage of the 1971 act.

5. This area consists of 398,000 acres of public land and 16,560 acres of private land ranging from about 5,300 feet to over 6,000 feet in elevation. This area would offer many management opportunities for wild horses, as it is the largest, most consolidated parcel of public land with the fewest conflicts. By managing horse numbers the, vegetation resources may also be managed to maintain the vegetation's vigor.

32-18 Issue: Water Development

Water developments were not proposed for the Slumbering Hills because no allotment management plan was proposed for the Daveytown allotment. Maintenance of existing water facilities should provide adequate water for existing uses.

Response Letter 32

32-19 Issue: Antelope Number Increases

Page 2-10 of the draft EIS (Antelope) indicates that antelope numbers since 1967 have risen 263 percent throughout the entire resource area. This increase is thought to be a result of improved kid production, mild winters (good overwinter survival), and improved census techniques.

32-20 Issue: Northward Flowing Waters

Two streams, Raven Creek and the east Little Owyhee River in the Owyhee Desert, flow northward and are part of the Snake River Drainage.

32-21 Issue: Incomplete Vegetation Production Data

Condition data were not collected on the Upper Quinn River allotment, largely because of the vast acreages of privately owned land and relatively small amount of public land in the allotment.

Condition data were not collected on the Sand Hills allotment due to oversight on the part of the Bureau.

Declining condition in a particular allotment may be due to excessive wild horse numbers, excessive livestock numbers, improper seasons of use, improper grazing systems, or any combination of these factors.

32-22 Issue: Competition Between Mule Deer and Wild Horses

Competition between wild horses and mule deer would occur to some degree on the mule deer's spring range, but this would be minimal providing that wild horses are maintained at carrying capacity as proposed. Competition would increase as wild horse numbers exceed the carrying capacity. Refer to the draft statement, page 3-22, "Wild Horses."

Wild horses do not occur on mule deer summer range. Mule deer winter range overlaps the Little Owyhee Spring Range only slightly, therefore competition is minimal. Dietary overlap between the two animals is also minimal during the winter months.

Mule deer populations are considerably larger in some other mountain ranges in the planning area, for example the Pine Forest Range and Bilk Creek Mountains. Differences in the quantity and quality of habitat are contributing factors to variations in population size.

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32-23 Issue: Estimate of Survival or Mortality

No time-specific life tables have been calculated because the data collected on wild horses on the district were not available. Therefore, no survival or mortality has been estimated.

32-24 Issue: Decisions Pertaining to Wild Horses and Burros

At this time no decisions have been made - only recommendations with the best information that was available at the time.

32-25 Issue: Estimating Natality and Mortality

No data were available for the annual mortality of horses in the resource area. The analysis did consider the estimated annual increase which would be overall natality (birthrate) minus overall mortality. Comparison with livestock death loss would have no bearing on the analysis.

32-26 Issue: Wild Horse Inbreeding

The Social Profile was merely a statement of the ranchers' opinions of the different resource values. It was not a statement of BLM policy.

Comment Letter 33



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL STABILIZATION AND CONSERVATION SERVICE
Nevada State ASICS Office
P.O. Box 360
Reno, Nevada 89504

April 7, 1981

Mr. Ed Spang
U.S. Department of Interior
Bureau of Land Management
Nevada State Office
P.O. Box 1200
Reno, Nevada 89520

Dear Mr. Spang:

The draft environmental impact statement prepared for the Paradise-Denio area provides extensive data. Like any collection of data, considerable latitude and judgement is made while interpreting.

33-1 | The most serious flaw I detected is the use of the 1978 range survey as your vegetative production base. Thus, the basis for the entire report on your range survey reflects the effects of the 1977 severe drought. The range survey would show the worst possible situation as the entire basis for your analysis. Therefore, I do not believe that a fair determination of impacts could be made.

There were several other unequable premises for determinations made which I will list for your further review:

33-2 | Why are livestock producers given three years to adjust numbers while five years are allowed for removal or reduction in the numbers of wild horses or burros?

33-3 | Why does aquatic habitat on private riparian lands have to meet BLM manual 6740 standards? Reduced grazing on public lands will necessitate increased grazing on private land, thus further affecting riparian habitat.

Fecal coliform counts are related to wild horses, burros, wildlife, and man's activities, not just cattle as alleged several places on your report.

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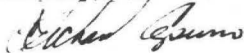
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Allocation of AUM's to wildlife, especially deer, would lead the reader to think that all feed was received from the public range resources. A significant portion of their substance is obtained from the private lands. Agricultural interests would find it necessary to control numbers they will now be expected to feed when livestock is denied AUM's on the public range.

May I again request that your agency take another look at the vegetative production, perhaps use another method of range survey. You will find the range capable of a much higher carrying capacity.

Thank you for the opportunity to review and comment.

Sincerely,



C. Richard Capurro
Acting Nevada State ASC Committee Chairman

Response Letter 33

33-1 Issue: Range Survey

See discussion on CRMP at the beginning of the Summary in the FEIS.

33-2 Issue: Wild Horse Removal Time Frame

The time frame of five years was needed to remove wild horses because of the following limitations.

1. Limited time frame for actual horse removals (July 1 - February 28) because of the foaling season.
2. The total number of wild horses to be removed.
3. Priorities from other districts within the state which limit the work that can be done on this district.

Considering these parameters, it was estimated that it would take five years to remove these horses.

33-3 Issue: Aquatic Habitat Standards on Private Land

The DEIS dealt only with public streams or portions of streams. The habitat condition of the private stream sections was noted, but the BLM 6740 manual requires only that public streams be maintained in good condition by BLM. This was stated in the last paragraph of page 3-24 of the DEIS.

Comment Letter 34

Nevada First Corporation

Farming Ranching Land Development

620 Melarkey Street, P.O. Box N / Winnemucca, Nevada 89445 / (702) 623-2586

April 2, 1981

Mr. Edward F. Spang
State Director, Nevada
U.S. Dept. of the Interior
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89529

Subject: Comments on Paradise-Denio Draft EIS

Dear Mr. Spang:

Nevada First Corporation's BLM grazing privileges are identified in the subject EIS Draft as the Bloody Run, Bullhead, Scott's Spring, Little Owyhee (summer), Little Owyhee (spring) and U.C. allotments. Ninety percent of NFC's activities involving livestock are dependent on the use of BLM grazing. As a result NFC has devoted an enormous amount of executive man-hours and a great deal of private funds as a result of the Paradise Denio EIS process.

While the EIS draft is an elaborate, detailed, complicated document its value as an accurate reference document is almost nil. It does point out the issues and gives a reader an idea of the scope and complexities of grazing's environmental impact. It does not give a reasonable assessment of the active and true grazing impact on the environment.

While the 1968 range survey may be the best information available to BLM from its own sources it is seriously inaccurate due to innumerable errors and omissions of field studies and office calculations. Forage acre requirement as used are recognized by private, university and BLM range specialists as unapplicable, and season-of-use is inappropriately applied. The 1968 survey is a static one-time statement with no evaluation of trend, and was taken during a

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severe drought year. It should not have been used as the basis for the allocation of vegetation in the EIS as it produces an overwhelming bias against livestock, wildlife, wild horse carrying capacities on a sustained year-after-year basis.

While the EIS Draft is full of errors, omissions and poor judgement, to detail them and correct each would require another 2 or 3 years project diverting funds from corrective, monitoring and improvement projects that are recognized necessary by all multiple users and agency personnel. Further delay in decisions would cause irreparable adverse impact on livestock operations, wildlife, wild horses, the local communities and the overall environment as well. It would also further debase the environmental protection cause which forced the EIS.

The EIS has produced its desired affect forcing all interest to give environmental protection full consideration when planning their activities. To destroy all activities by further decision delays in the name of environmental protection would be counter-productive both for the users of public land and protectionists.

34-1

The EIS Draft Summary (page i11) does give all involved a ray of hope when it states "The concepts of coordinated resource management and planning will be considered in all cases of future vegetation allocations". The ball is now in the hands of all interests to make sure a CRMP for each allotment or area is valid and meaningful. If the CRMP'S are in fact meaningful and accurate the BLM would be negligent not to give them full consideration in its planning and operations. Cooperative Resource Management Planning participants must adequately represent all interests (user & environmental) to be valid. The users and interests must accept the burden of participation and results if they hope to see their desires put into action.

At this point I urge you not to try to correct the Draft by complete re-writing if it delays the decision making process but, instead, recognize its severe shortcomings during the CRMP process and make corrections at that time and as the plans progress through adequate monitoring of operations.

None of the alternatives proposed in the EIS are acceptable, nor will they produce the affect desired by the protectionists who instigated the EIS process.

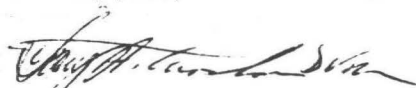
Don't delay the decision making process any further by trying to correct 2 years mistakes, correct them through CRMP'S. Recognize the value and intent of local CRMP groups, accept valid CRMP plans as they are completed, allow reasonable time for CRMP's in process to be completed and complete your decisions on allotments where permittees, BLM and interests

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(including environmental) are in agreement without CRMP'S in a timely manner so all can get on with business and quit wasting time beating a dead horse.

Sincerely yours,



Gary A. Thrasher
Executive Vice President
Nevada First Corporation

Response Letter 34

34-1 Issue: Role of CRMP

See discussion on CRMP at the beginning of the Summary in the FEIS.

Comment Letter 35

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April 24, 1981

Mr. Edward F. Spang
Bureau of Land Management
Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, NV 89520

Re: 1792 NR03, N-020

Dear Mr. Spang:

The American Horse Protection Association thanks you for the opportunity to comment on the draft environmental impact statement for the Paradise-Denio Livestock Grazing Management Program. We realize that this letter is being sent too late for inclusion in the final EIS, but we understand that the comments will still be considered in reaching a final decision.

We find the proposed action to be unacceptable. According to the EIS, some 65,000 livestock use the grazing area. These are less than 2,500 horses. The livestock require nearly 200,000 AUMs per year, the horses less than 30,000. Yet you propose to reduce livestock grazing, on the average, by less than 50%, while the wild horse herd will be chopped to 386 head -- an 85% reduction. All the horses are to be removed from most of the herd areas in Paradise-Denio. Game animals, on the other hand, will suffer the minimal and temporary loss of only 600 AUMs per year.

Even in the long run, horses will be excluded from most of the expected range improvements. AUMs allotted for big game will eventually exceed present use, while livestock AUMs will return to 84% of present use. Wild horses will be allotted 2,000 additional AUM's to total only 25% of present use. This

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Mr. Edward F. Spang

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April 27, 1981

is not an equitable distribution of range resources; the various users of the range have not been treated equally, with the horses, as usual, getting the short end of the stick.

The EIS contain no evidence to justify removing 85% of the horses. To the contrary, if this area is overgrazed, it is because of livestock use, which is ten times the horses use today, and has been even greater in the past. Indeed, there is no way to be certain what the existing horse use is because the Bureau has no accurate data. The EIS contains no inventory data; there is no breakdown of how many horses are in each allotment or in each horse range. The EIS assumes that the horses are increasing at a rate of 14% per year, but nothing has been done to substantiate this assumption.

35-1

Of the limited alternatives presented, we find the Livestock Reduction/Maximize Wild Horse and Burro Alternative most acceptable. Under this proposal, 700 horses would be allowed to remain, or 28% of the current herd.

The additional horses could be maintained at little expense to livestock interests. Under the Bureau's estimates, some 16,000 fewer AUMs would be allotted to livestock at a cost of \$100,000 in yearly income to area ranchers, or 0.3% of total area income from ranching.

We are somewhat mystified as to why even this minimal loss is necessary. The additional horses will need fewer than 4,000 extra AUM's yet livestock AUMs will be cut by 16,000. Possibly this is because the proposal assumes the creation of several livestock-free horse ranges. This seems totally unnecessary, and a waste of space and resources. If it is necessary, then the extra AUMs should be allotted to horses, allowing for more than 700 to remain on the range.

Whatever alternative is adopted, we believe the Bureau has overestimated the degree of impact that horses have on the range and on livestock by way of competition.

The assumption is made that a given range can support livestock or horses equally. This is not so. First, dietary overlap between horses and cattle (which comprise most of the livestock) is not complete. Even in critical spring months, it is at most 60%. (We note that diet studies should be done before horses are removed). This means, under the theory of

Mr. Edward F. Spang

-3-

April 27, 1981

common use, that the range can support -- without detriment -- a greater number of cattle and horses together than of each separately. This should be taken into account in reaching a final decision.

35-2 Second, in computing range suitability and grazing capacity, the Bureau has also treated horses and livestock as if they were the same. Again, this is incorrect. Horses graze on steeper slopes than cattle. They graze farther from water resources than cattle. This means that a given range will support more horses than cattle. It means that a given range will support more horses and cattle together than it will cattle alone. These factors must be considered.

35-3 The case is even more egregious for the 50 burros in Paradise-Denio. The EIS assumes that burros eat 1 AUM per month, the same as the cattle or horses. Since burros are only half the size of horses and cattle, this impact on range resources has been grossly overestimated.

In sum, we find no basis in the draft EIS for eliminating 85% of the wild horses in Paradise-Denio. The data presented does not justify it. Reasonable alternatives permitting more horses to remain on the range were not considered. Essential data, even as to how many horses there really are, is missing.

35-4 Finally, we note that the Bureau has determined that removing more than 4,000 horses over a five year period is a substantial impact under NEPA. We trust that if the Bureau decides to proceed with the massive roundup, it will first prepare the required environmental impact statement.

Very truly yours,

Joseph E. Schuler

Joseph E. Schuler
Attorney for
American Horse Protection
Association

JES/tj

35-1 Issue: Wild Horse and Burro Inventory Data and Productivity

Inventory data for the EIS were taken from the Unit Resource Analysis (URA) and then projected to 1980. Table 2-8 on page 2-17 of the draft statement shows a breakdown of the current wild horse and burro areas in the allotments involved. Appendix C, page 6-15, shows the methodology for computing estimated annual increase in wild horses and burros, using previous inventory data.

35-2 Issue: Application of Suitability Criteria to Wild Horses and Burros

See response to Issue 32-7.

35-3 Issue: Wild Burro Dietary Requirements

Even though wild burros are smaller animals than wild horses the assumption was made that forage would be equal to that of the wild horse because of directives stated in Washington Office Memo 76-339 (available in the files at the Nevada State Office and Winnemucca District Office). This memo states in part "In order to be consistent throughout the Bureau, 1.0 AUM will be used in determining forage allowances for wild horses or burros. This standard is the same as that for domestic horses and burros which will appear in the revised grazing regulations."

35-4 Issue: Wild Horse and Burro Gathering

All roundups that are conducted by the district are preceded by a gathering plan and Environmental Assessment (EA) to determine if there are any significant impacts. From this determination a decision is made about the need for an EIS.

Comment Letter 36

SMITH & GAMBLE, LTD.

ATTORNEYS AT LAW

JULIAN C. SMITH, JR.
DAVID R. GAMBLE
WAYNE S. CHIMARUSTI

May 4, 1981

802 NORTH DIVISION STREET
CARSON CITY, NEVADA 89701
TELEPHONE (702) 883-3200

Mr. Frank Shields
District Manager
Winnemucca District Office
705 East Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Shields:

Following are the comments of Pine Forest Land and Stock Company, Inc. on the draft EIS for the Paradise-Denio Resource Area.

Alternatives Considered

36-1 The draft EIS is legally inadequate because it fails to consider the most logical alternative. The alternative of maintaining livestock numbers at the present levels and the initiation of monitoring to determine carrying capacity and stocking rates has not been considered. This alternative should also provide for initiation of range improvements on a priority basis established through the monitoring process. This alternative would have absolutely no economic impact on the range users or the affected communities initially. The planning and enhancement of recreational, wildlife, grazing and other multiple uses of the resource could be best accomplished through coordinated resource management and planning. For the DEIS to ignore this alternative makes it legally deficient under NEPA.

Range Inventory

The DEIS states that the best information available is the 1978 range inventory conducted by the Bureau of Land Management. This statement is patently untrue. The scientific community has for more than 30 years recognized that range surveys in the Great Basin area are not a reliable method of inventorying forage available. Sporadic precipitation resulting in vast variation in vegetation in any given area makes range surveys in the Great Basin area totally unreliable and therefore useless. At the time the Bureau of Land Management embarked on preparation of EIS's with the pilot project at Challis, Idaho, the scientific community advised the BLM that the use of range surveys in

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Page Two

the great basins was not an appropriate method of inventorying the range's carrying capacity. In spite of this professional advice, the BLM has embarked on the use of range surveys even though the procedure has been discredited for more than 30 years. The University of Nevada, through various range scientists, has repeatedly reminded the Bureau of Land Management that range surveys cannot be relied on for inventorying forage in Nevada.

The range survey conducted in the Paradise-Denio Resource Area was conducted in a year following the worst drought known to the area in many years. William Harkenrider of the Bureau of Land Management stated to the USDA-ASCS in 1977 that the range conditions in the Paradise-Denio Area were from 40 to 50 percent of normal. In spite of this knowledge, the BLM conducted its range survey in 1978 at a time when the range conditions were at an all-time low. With the application of all adjustment factors, no amount of mathematical calisthenics can correct the range survey results to show true average range conditions. Any credible range scientist will acknowledge that range surveys conducted in years of drought will show less carrying capacity than range surveys conducted in years of good forage production. The Paradise-Denio DEIS ignore this fact and purports to allocate range in the preferred alternative based on drought year range surveys.

The 1965 range surveys conducted by the BLM have been totally disregarded in the allocation of forage or establishment of trend on the range. We submit that this evidence is available to the Bureau of Land Management and should be considered if the BLM is committed to reliance upon range surveys in allocating forage.

It is common knowledge that the young people conducting the range survey in the Paradise-Denio Area in 1978 were inadequately trained and unqualified to conduct an ocular reconnaissance of such a complex range ecosystem. The surveys were conducted without establishing any reference points through clipping and weighing and without the use of rudimentary data verification. State recommended proper use factors were ignored and in their place PUF's were used that grossly underestimate the available forage. Cheat grass was assigned a PUF of less than 100 even though it is considered an undesirable species.

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On the Pine Forest and the Paiute Allotments, the season of use allocating to various regions was totally inconsistent with both historic use and the common sense use of the forage. The Blackrock Desert was assigned summer season of use and other spring use areas were assigned summer seasons of use, resulting in drastic deficiencies in the available forage during the assigned season. The use of an appropriate season of use coupled with a survey during that season of use will result in the identification of vastly greater amounts of forage. There was absolutely no consultation with the local ranchers in identifying the season of use of the various areas or in identifying the various forage species available in those areas.

The identification of vegetative units for purposes of the survey was done unprofessionally by inexperienced personnel resulting in designation of vegetative units that distort the true forage availability. This inaccurate designation of vegetative units coupled with the other criticism of the range survey hereinabove set forth has resulted in 82,204 acres of the Pine Forest Allotment being found unsuitable for livestock grazing because its production is below 32 acres per AUM. A properly done survey will show that the production of the majority of that 82,000 acres will be substantially higher than the 32 acres per AUM cutoff point.

The application of the 50 percent slope suitability criteria to the Pine Forest Allotment is totally inappropriate on most of the range. It is our belief that a more careful identification of 50 percent slope lands in the allotment will substantially reduce the 10,195 acres identified as being in excess of 50 percent slope. After identification of the portion of the allotment that is in fact with a 50 percent or greater slope, a qualified range scientist will determine that most of that steep slope area is suitable for grazing in view of the fact that there is water occurring on the slope and in view of the fact that the soil types on these steep slopes are not those susceptible to erosion. It is our interpretation of the suitability criteria concerning slope that it is only lands with a 50 percent or greater slope and susceptible to erosion that should be found unsuitable for livestock grazing. We submit that with the proper application of this suitability criteria to the lands in the Pine Forest Allotment that there will be essentially no land found to be unsuitable for livestock grazing because of slope.

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Page Four

It is our belief that in view of the pattern established by range survey crews in other portions of the state, that a detailed analysis of the range survey data will reveal large errors in mathematical calculations, application of proper use factors and other careless workmanship that will ironically have the net result of reduction in the amount of forage identified on the allotments.

The end result of the range surveys has been drastic reductions in forage identified on the Pine Forest and Paiute Allotments as well as throughout the entire resource area. These drastic reductions viewed in light of historical use, previous range surveys, known range production and wildlife trend, leaves the obvious conclusion that the 1978 range surveys are not the best evidence available but fatally defective. In view of this fatal flaw in the range surveys, it is our position that they should be found officially defective and unreliable and discarded, and in no way referred to or relied on in preparation of the Paradise-Denio EIS.

Coordinated Resource Management and Planning

36-2

We endorse the concept of CRMP and feel that the Pine Forest mountain range is a textbook example of an appropriate application of CRMP. The DEIS endorses the concept of CRMP, however, with one fatal prerequisite. The DEIS requires that CRMP be undertaken with the 1978 range surveys as the data base. The CRMP committees, in order to be meaningful, must consist of persons knowledgeable with the resource area. To require these people to accept as fact a range survey with the flaws as identified hereinabove, is absurd. Planning in the area must fail when founded on an erroneous data base.

The only reasonable method of obtaining a workable plan for the utilization of the Pine Forest range resource is to monitor the known and historical use of the range. Initiation of the alternative suggested in the beginning of these comments will allow the assimilation of an accurate and usable data base.

No planning by the Bureau of Land Management that is done hostile to the owners of the private land can succeed. The private land controls access to the majority of the streams and vast tracks of the public lands. The Leo Sheep case, decided by the United States Supreme Court recently established once and for all that the Bureau of Land Management or any other federal agency has no implied right of way through private lands. If the BLM chooses to rely on the erroneous 1978 range survey and expects the cooperation through CRMP, they are sadly misguided.

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Mr. Frank Shields
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Page Five

Errors in Mapping

36-3 The maps in the DEIS that delineate the Pine Forest Allotment are grossly in error. The actual allotment boundaries include all of the drainage of Leonard Creek, including its tributaries. It encompasses Duffer Peak and includes portions of the drainage of Knott Creek. The delineation on the maps in the DEIS do not accurately depict this.

36-4 The map entitled Vegetative Types identifies two "barren areas" on the Pine Forest Mountain. One of these barren areas is located in the center of a crested wheat seeding and the other is located in what is known as Leonard Creek Meadows, an irrigated meadow area near the headwaters of Leonard Creek. It is obvious that the personnel who identified these areas as barren have not seen them. The map should be corrected in this regard. There are no barren areas on Pine Forest Mountain other than the tops of large boulders that would be microscopic to map and insignificant.

Fencing

The DEIS identifies various fences to be installed on the Pine Forest Allotment. There has been absolutely no discussion with the permittees on the allotment of the location of these fences. The fences as identified on the DEIS map are simply ridiculous. On the contrary, there is a fence needed on the Paiute Allotment that would separate the use by the Paiute Ranch from the use by the Leonard Creek Ranch on that allotment. This fence has been proposed for decades and would be an extremely useful management tool. The DEIS does not identify this much needed management tool.

Figure 1

36-5 Figure 1 in the DEIS graphically shows a comparison of the four alternatives analyzed by the DEIS. It does not, however, indicate the present situation on the allotment. This results in the representation being grossly misleading, bordering on outright dishonesty. We would recommend that the figure be redrawn to reflect the existing situation so a comparison can be drawn as to the effect of all of the alternatives.

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Acreage Analysis

36-6 I have been unable to find in the DEIS analysis of the acreages identified in the range survey as being suitable and unsuitable for livestock grazing. I am aware that this data is available to the BLM, and it would appear to me that it would be absolutely essential to the decision-maker in evaluating the impact of the various alternatives on the resource. It is conceivable that the decision-maker on the document may very well conclude that an alternative that finds over half of the resource area unsuitable for livestock is fatally defective. This is especially true knowing that the entire resource has been used for livestock grazing for more than a century.

Trend

The DEIS purports to identify the Paiute and Pine Forest Allotments as being in a downward trend. However, there have been no trend plots or enclosures established in these allotments prior to the survey. BLM staff, who conducted the survey, have admitted that they have no way of assessing the trends in these areas. Yet the DEIS purports to identify the trends. We are also aware that trend plots have been established subsequent to the 1978 range survey and we are also aware that those trend plots show a substantial upswing in the condition of the range. This upswing in the range condition has been with the historical livestock utilization, not the reduction advocated in DEIS. We feel that is inherently dishonest for the BLM to disregard their most current data regarding trends in analyzing the various alternatives. Of course, BLM policy is that the suitability will not be applied in range with an improving trend. The majority of the reduction in livestock carrying capacity indicated in the preferred alternative on the DEIS would be wiped out if there was no application of the suitability criteria on the Pine Forest and Paiute Allotments. This is true even with all of the flaws in the range survey herein above indicated.

Treatment No. 8

The DEIS is extremely difficult for me to read and comprehend because of its convoluted presentation of the facts. My interpretation, however, of the grazing treatment analysis is that in allotments scheduled for AMP's that

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treatment No. 8 will be applied. Treatment No. 8 proposes to hold livestock off of the allotment until early summer. The analysis on page 1-11 indicates that there is continuous use of the range on these allotments. This is a grossly erroneous assumption. On the Pine Forest and Paiute Allotments, the normal migration of the livestock is from the spring country to the summer country back to the winter country, with substantial numbers of the livestock being removed before going to the winter country. There are long periods of absolutely no use by livestock on substantial portions of allotments during different portions of the year. The implementation of grazing treatment No. 8 would both have devastating effects on the livestock operations and accomplish absolutely no useful purpose in the management of the range. It would totally waste utilization of approximately one-third of the range on the east portion of the Pine Forest Allotment and in addition it would leave Pine Forest Land and Stock Company without a place to pasture the cattle during the most critical pasture season.

I question my interpretation of the DEIS in this respect because it is incomprehensible to me or to my clients that the DEIS actually purports to implement this absurd range treatment. I would hope that this is a misreading on our part.

Respectfully,

SMITH & GAMBLE, LTD.


Julian C. Smith, Jr.

JCS:nat

cc: Pine Forest Land and Stock Co.
Ed Spang

36-1 Issue: Need to Consider Alternatives

See response to Issue 5-22.

36-2 Issue: Role of CRMP

See discussion on CRMP at the beginning of the Summary in the FEIS.

36-3 Issue: Map Discrepancies

See response to Issue 12-1.

36-4 Issue: Vegetation Types Map

See Errata - Chapter 2 corrections to Vegetation Types Map.

36-5 Issue: Present Allocation in Summary Figure 1

For the purpose of comparison the No Action alternative would be equal to the present situation.

36-6 Issue: Suitable and Unsuitable Acreages

A breakdown of suitable and unsuitable acreages by allotment is shown in Appendix G, Table G-1, on DEIS page 6-28.

Comment Letter 37

MAX C. FLEISCHMANN COLLEGE OF AGRICULTURE

UNIVERSITY OF NEVADA RENO
KNUITSEN RENEWABLE RESOURCES CENTER
1000 VALLEY ROAD
RENO, NEVADA 89512



RESIDENT INSTRUCTION
AGRICULTURAL EXPERIMENT STATION
COOPERATIVE EXTENSION SERVICE

May 6, 1981

Mr. Frank C. Shields, District Manager
Bureau of Land Management
705 East 4th Street
Winnemucca, NV 89445

Dear Frank:

Here are some comments on the "Paradise-Denio Grazing Environmental Impact Statement" draft. Thank you for sending me copies to review.

As with previous draft environmental impact statements on grazing of rangelands administered by the Bureau of Land Management, the Paradise-Denio EIS is based on range survey, use of suitability criteria, and use of a computer program for allocation of forage. Strict application of these approaches has not been generally acceptable. The draft EIS also reflects an apparent continuing bias against livestock use (at least at present levels) on BLM administered lands.

It has been my experience in the Great Basin that there are so many variables, unknowns, and considerations sometimes erroneously accounted for that it is nearly impossible to allocate forage using the methods outlined in the draft EIS. A more acceptable approach for use in large areas such as Paradise-Denio will probably involve review and evaluation of use and management over the past several years, use of condition and trend data, management plan preparation involving all interests and expertise available, and a monitoring program to aid in making changes where needed if resource objectives are not being met.

Recent statements by BLM people and what appears to be wholehearted and sincere participation in the Coordinated Resource Management and Planning program in the Winnemucca area tell me that the forage allocations suggested in the draft EIS will not be a problem. This is also strengthened by brief discussions of CRMP in the draft EIS. I am assuming that use of the "CRMP and monitoring" approach will be more clearly and definitely spelled out in the final EIS. It may even be possible in the final EIS to develop the proposed action around "Resource optimization and protection" with heavy emphasis on using the CRMP process.

If the CRMP process is effectively used there should be few unresolved resources problems in the Paradise-Denio area. I do have a few further comments and suggestions for BLM and those working through CRMP:

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UNIVERSITY OF NEVADA & UNITED STATES DEPARTMENT OF AGRICULTURE COOPERATING

37-1

Comment Letter 37

1 - There is substantial agreement among range professionals that grazing management systems can be developed to provide for livestock use during the early spring without damage to the resource -- especially where there are crested wheatgrass seedings.

2 - Wild horses are projected only in a few allotments. It may work better to determine a reasonable number of wild horses and spread them over more area where they are acceptable to the people involved.

3 - I don't understand why some allotments should not have allotment management plans. It seems they are appropriate in all grazed areas.

4 - The schedule for implementation (Table 1-6) will probably change depending on eagerness of grazing users to develop resource plans. I notice the UC allotment is lowest priority in the draft EIS but now is the first to have a plan through CRMP.

5 - Re-establishment of bighorn sheep is proposed in a number of locations. I don't hear a big clamor for their introduction on a large scale basis.

6 - Only 8.7 percent of the area has soil surveys. I strongly recommend their completion in the whole EIS area. Soil surveys can be correlated with range sites to help determine ecological potential (helpful in formulating meaningful objectives and measuring progress toward them). They are useful for preparing management plans and are of value especially in making general plans for range improvements.

7 - The draft EIS estimates only 3694 acres of riparian area. The potential for restoration of additional riparian areas is undoubtedly substantial. Many have deteriorated to brush types and their potential is not recognized. Hopefully the many benefits of their restoration will be fully recognized relative to costs as improvements are considered.

8 - There is much attention given to such as water quality, visual resources, and cultural resources which are all important considerations. I would hope that all of these aspects are fully considered as improvements are planned and applied. There should not be much need for strict application of arbitrary standards and parameters if CRMP groups agree with what is to be done and these dimensions are included in general standards for the work to be done.

Although the Paradise-Denio draft EIS presents problems for many people in the area I believe the Winnemucca district can now proceed with final EIS preparation and implementation of a grazing program that will involve all interests and provide for red meat production from public lands at near or possibly exceeding present levels. Other uses will be fully considered and the resource base will be sustained or improved.

If you have questions on these comments or if I can help otherwise let me know.

Sincerely,


James Linebaugh
Range Specialist

cc: Bill Calkins
Mike Kilpatrick
Dr. Dale Bohmont
Dr. Paul Tjeller
Joe Thackaberry
Ken Sakurada

JL:jc

37-1 Issue: Role of CRMP

See discussion on CRMP at the beginning of the Summary in the FEIS.

NEVADA LEGISLATURE
 FEDERAL REGULATION REVIEW COMMITTEE
 LEGISLATIVE BUILDING
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STAFF DIRECTOR ROBERT E. ERICKSON (702) 885-5617

May 7, 1981

District Manager
 BLM-Winnemucca District
 705 E. 4th Street
 Winnemucca, NV 89445

Dear Sir:

The Nevada legislature's federal regulation review committee has reviewed your draft environmental impact statement for grazing in the Paradise-Denio area. In response to this statement, the following official comments are provided:

1. According to your impact statement, the existing use of AUM's is 238,876 per year. Your 1978 range survey, however, showed that only 124,927 AUM's are available in this area for livestock, wildhorses and burros, and wildlife. Our committee would therefore question why any vegetation exists at all in this area if annual vegetation consumption is twice the amount available. This question leads us to two possible answers: (a) vegetation is being grazed twice as heavily as the plants can produce new growth each year, or (b) the 1978 range survey is inaccurate. Because this area has not been overgrazed into a vast desolate wasteland, we assume that the 1978 survey is not particularly accurate.
2. We strongly support the following policy expressed on page 1-2 of your document: "The intent of the BLM is to use reliable new information that becomes available from BLM land users or other sources before implementation of decisions." (emphasis added). For example, later documentation developed by range users in the Caliente resource area of Nevada demonstrated that the initial range survey used by BLM was inaccurate and deficient. We therefore support the use of new information by BLM as it becomes available.

38-1

Comment Letter 38

Thank you for the opportunity to review and comment on the Paradise-Denio statement.

Sincerely,



Karen Hayes, Chairman

KH:REE:jlc:4.2.BLM

Response Letter 38

38-1 Issue: Use of New Information

See discussion on CRMP at the beginning of the Summary in the FEIS.



May 7, 1981

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Clover Valley, Wells
- Dave Secrist
Elko

Mr. Ed Spang, Director
Bureau of Land Management
P. O. Box 12000
Reno, NV 89520

Dear Mr. Spang:

The Nevada Cattlemen's Association provides the following brief comments on the Paradise-Denio Environmental Impact Statement:

Pg. 1-1, Alternatives including the Proposed Action.

39-1

CRMP: This paragraph states that since the 1978 range survey is the best information available to the BLM, at this time, it was used as the basis for the proposed allocation of vegetation. We do not support using the forage production data from this survey, or any others, to be used as a basis on which to allocate forage. The forage survey method is extremely vulnerable to manipulation and human error and has proven to be faulty in other districts throughout the state. We must suspect that the survey in the Paradise-Denio area is also an unreliable basis to establish stocking rates. Range professionals have documented that many errors have been made in the forage data for the survey.

We support the setting of stocking rates through the evaluation of long-term trend and utilization studies. These are probably the most reliable means available to determine the actual conditions of the range. However, they can also be influenced by personal bias.

Livestock adjustments should not be made until a trend can be determined through the monitoring program.

Wild horses must be reduced immediately in areas where they are in excess of 1971 numbers or where they were already excessive in 1971. Unless wild horses are controlled, it is impossible to conduct multiple-use management on the public lands.



NATIONAL CATTLEMEN'S ASSOCIATION
Affiliate Member

Mr. Ed Spang
May 7, 1981
Page 2

An active range improvement program should be implemented as soon as possible in order to provide the badly needed range improvements that have been held up due to the unfortunate approach taken to fulfill N.E.P.A.

We realize that these comments are brief and really don't support any of the alternatives. However, we strongly feel that the public lands should be managed under the most practical and scientifically proven methods available. What we have recommended fulfills these requirements.

Sincerely,

Paul Bottari, Executive Secretary

PB/sk

Response Letter 39

39-1 Issue: Role of CRMP

See discussion on CRMP at the beginning of the Summary in the FEIS.

Comment Letter 40

COMMENTS ON DRAFT E.I.S.

This will not be a complete response to the E.I.S. Draft. That would take a week to present; however, I would like to hit some of the highlights.

I sincerely doubt that a fair and impartial E.I.S. could have been written under the administration of Chet Conard. One of his first comments to the people of Winnemucca District was, "You people are spoiled, and I've come here to teach you the facts of life, which I intend to do before I leave." From that beginning the situation and communications eroded to zero.

In my opinion, the E.I.S. team leader, Bill Harkenrider, had neither education, experience, nor desire to author a fair and unbiased E.I.S..

The draft E.I.S. fails to adequately explore the history of livestock use in the area and the past relationship of livestock to wildlife and wild horses. Beneficial effects of livestock grazing are not explored. A negative regard for livestock and their influence on the environment is expressed throughout the draft. Data available does not support this negative attitude.

Forage allocation provisions for big game are unnecessary. Forage in excess of big game needs exist in areas denied to livestock allocation. (i.e. rested fields, time livestock can not be on B.L.M.) Also, big game generally consume different plants than do livestock.

40-1

Forage surveys for E.I.S. was done in the second of two drought type years, and many were done in the Fall with personnel who were not sufficiently trained to evaluate under these circumstances.

To the best of my knowledge, none of the permittees in Paradise-Denio were notified that a range survey was being done on their allotment, even though I know some had requested to be notified and allowed to participate.

Data from range survey was denied, at least to me, until I requested it under the "Freedom Of Information Act". Even then, I had to pay for copies of all material I received. It is my

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Comment Letter 40

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understanding that livestock people were the only ones who were treated in this manner.

The draft is developed from insufficient data in regard to trend and condition, simply because the trend and condition studies were not done, and were not current.

The draft does not take into consideration grazing rights. These "rights" were established by law under the Taylor Grazing Act and confirmed as rights through all acts of the Internal Revenue Service, whom the Bureau Of Land Management has never challenged.

A Federal Judge ordered the Bureau Of Land Management to make an Environment Impact Statement of the Western Rangeland administered by the Bureau Of Land Management; however, I don't find any place where he ordered them to make a readjudication of livestock. That should come after the judge accepts the final E.I.S. and all arguments are heard in the courts or hearings.

No consideration was given to the fact that Western Rangeland use by livestock is energy efficient. This energy resource can only be harvested and put to use for the benefit of all people through the utilization of livestock grazing.

No consideration of the environment was given to the fact that livestock and agriculture are the true backbone of the environment. Other uses may come and go, but we all know that agriculture and livestock uses have historically been the most permanent and stable of all uses.

There is one question that must be answered. What are we writing an Environment Impact Statement for? Are we trying to establish a pristine environment, a recreation environment, a productive environment, or something realistic in between all of these uses?

I would like to enter here a paper by Dr. C. Wayne Cook, Department Of Range Science, Colorado State University.

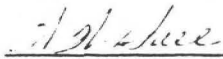
Enter - EXHIBIT A.

I request that the method advocated by Dr. Cook and a majority of range scientists, for establishing stocking rates, be implemented into the Paradise-Denio E.I.S. to replace the Ocular Reconnaissance and Forage value method presently being used in the E.I.S. draft.

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Mr. Spang, On behalf of the Nevada Cattlemen's Association and myself, I request a six (6) month extension of time for public comments. The time limit now proposed, April 7, 1981, is totally unrealistic in view of the amount of technical data that must be reviewed to make a complete response to the proposed E.I.S.. After all, you are asking us to review and comment on this document, the Paradise-Denio Environment Impact Statement, that took a full staff working full time for approximately two years to write. If you truly want an accurate and intelligent response, you will grant us sufficient time to accomplish this!


W. W. Hall
BARNEN CATTLE INC.

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EXHIBIT A.

Determining Grazing Capacity of Ranges

C. Wayne Cook

Department of Range Science
Colorado State University

Currently Range Scientists do not feel that carrying capacity of a range can be determined by any survey method used to date. Rather, it appears the best, and most modern approach to determining carrying capacity of rangeland is to evaluate the utilization being made of the area along with determining changes in vegetation expression with respect to vigor, reproduction, death and replacement of plants over a period of 3 to 5 or even ten years. This would yield information regarding degree of use that would be acceptable on key areas representing the larger range sites to be managed. Trend of range condition could be objectively measured through intermittent measurements over time.

Grazing systems could be initiated and evaluated by this approach. Permanent plots would by necessity have to be established and revisited to determine change over time. These bench marks would be representative of larger and/or critical range sites. Several plots would be established for each vegetation type in each allotment. At the same time corrective measures for any adverse features apparent in the grazing system could be made from year to year as the management plan is evaluated. If we are truly concerned with management of the land resource some method resembling this approach must be used.

Grazing capacity of the range would depend upon the season of use and the species of animal grazing the area. For instance, most desert ranges used during the winter have twice the capacity as the same range used during the spring and summer.

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Various combinations of "range condition" and "range trend" are considered unsatisfactory and need corrective measures. No range in a downward trend regardless of range condition can be considered satisfactory and would require corrective measures. Range trend, however, requires at least two visitations to the same plot or area where data is collected for comparison. Trend should consider rather long-term climate (weather) shifts. Poor range except in the local areas should be in an upward trend. Fair and good condition range could be and often is considered satisfactory if the trend is static or upward.

The corrective measures to be considered, include: change of season of use; change in class of animal; obtaining better distribution through water development, salting, drifting or herding and trail construction; range improvement and reductions in numbers.

The necessary corrective measure or measures may be only one of the above or any combination including all five measures. The cause of the adverse effects in most cases can be identified and corrected rather effectively.

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40-1 Issue: Range Survey

See discussion of CRMP in the beginning of the Summary of the FEIS.

The following are portions of spoken comments presented at the public hearing conducted in Reno, Nevada, March 10, 1981. Only those portions which required a response were reprinted along with the response from BLM.

ROBERT HAGAR:

T1-1

The entire concept of the one-time range survey and stock grazing based upon a one-time survey of forage levels is ridiculous. Monitoring is the only scientific grazing method which can be used to determine what the proper stock grazing are and any attempts to base stock grazing on this unscientific data is intellectually dishonest.

T1-2

First, the economic impact. The most recent, the most advanced econometric modeling showed that a proposed reduction resulted in an \$6,326,880 impact, direct impact on the local economy. This figure is based upon a \$70 per AUM impact and this is the figure that the Department of the Interior in Washington D.C. is now accepting as the most recent impact in terms of the econometric model.

HEARING RESPONSE T1

T1-1 Issue: Range Survey

See discussion on CRMP at the beginning of the Summary in the FEIS.

T1-2 Issue: Method of Economic Analysis

See response to Issue 5-16 and 29-3.

HEARING COMMENT T2

The following are portions of spoken comments presented at the public hearing conducted in Reno, Nevada, March 10, 1981. Only those portions which required a response were reprinted along with the response from BLM.

TINA NAPPE:

T2-1

I'm not totally in contradictory with Mr. Hagar but I had great concerns about the lack of emphasis and concerns about the riparian areas and also about the reductions of deer herds.

T2-2

I am still unclear about the range survey method as a layperson and how that relates to what Mr. Hagar proposes as far as monitoring and it's very unclear to me how CRMP is going to work in there since CRMP is not totally defined as to who will be represented in it and apparently the document does say that it will rest on CRMP, certain amount for decisions that come out.

HEARING RESPONSE T 2

2-1 Issue: Protection of Riparian Habitat

See response to Issue 5-15.

2-2 Issue: Role of CRMP

See discussion on CRMP in the beginning of the Summary in the FEIS.

HEARING COMMENT T 3

The following are portions of spoken comments presented at the public hearing conducted in Winnemucca, Nevada, March 11, 1981. Only those portions which required a response were reprinted along with the response from BLM.

LAWRENCE FRENCHY MONTERO:

3-1

I'm just going to be making some comments on some things that I saw in the E.I.S. that I figured were wrong in it and the thing--it states there that--the BLM states that Pine Forest has 124,000 acres of land and the Paiute allotment has 177,000 acres and out of the 124,000 acres on the Pine Forest, they state that 100,000 of those acres are unsuitable for cattle . . .

HEARING RESPONSE T3

3-1 Issue: Range Survey

See discussion on CRMP in the beginning of the Summary in the FEIS.