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SONOMA·GERLACH Grazing Environmental Impact Statement

FINAL

**United States Department of the Interior
Bureau of Land Management
Winnemucca District Office
Winnemucca, Nevada**



FINAL

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM

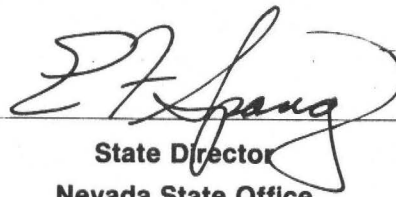
for the

SONOMA-GERLACH RESOURCE AREA

Nevada

Prepared by

**DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WINNEMUCCA DISTRICT**



State Director

Nevada State Office

The Bureau of Land Management proposes to implement a livestock grazing management program for the Sonoma-Gerlach Resource Area of the Winnemucca District in north-central Nevada. This program proposes to allocate available vegetation to livestock, big game, and wild horses and burros; 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 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 Winnemucca District of the Bureau of Land Management (BLM) proposes to implement a livestock grazing management program in the Sonoma-Gerlach Resource Area. The Sonoma-Gerlach Grazing Environmental Impact Statement (EIS) covers approximately 4.5 million acres of BLM-administered public lands in the Sonoma-Gerlach Resource Area. Approximately 1.5 million acres of private, state and other lands are scattered throughout these public lands. In addition, the Summit Lake and Pyramid Lake Indian reservations are located within or adjacent to the resource area.

Five alternatives including the proposed action are being analyzed in the EIS: No Action, No Livestock Grazing, Maximizing Livestock Grazing, Maximizing Wild Horses and Burros, and the Proposed Action.

The various components to be analyzed for the alternatives, including the proposed action, which is the Bureau's preferred alternative, are: (1) Vegetation Allocation Program (Summary Figure 1), (2) Levels of Grazing Management, (3) General Implementation Schedule, (4) Livestock Support Facilities, and (5) Standard Operating Procedures.

Chapter 1 addresses the alternatives, including the proposed action. The present condition of the affected resource area is discussed in Chapter 2. Analyses of the alternatives including the proposed action, along with a discussion of avoidable and unavoidable impacts and means to lessen the effects of the more severe impacts are presented in Chapter 3. The Appendices contain methodologies and back up data.

The year 1982 will serve as the decision for action point followed by a seven year period to implement range improvements and land treatments (1989). A two year time period, designated short term, which would be 1991, has been allowed for land treatments to become fully effective. The long-term date (2024) is 35 years after implementation (1989). Summary Figure 2 further identifies these dates.

COORDINATED RESOURCE MANAGEMENT AND PLANNING

The recompilation of the 1947 and 1960 s range surveys 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 initiat-

ing 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.

AREAS OF CONTROVERSY

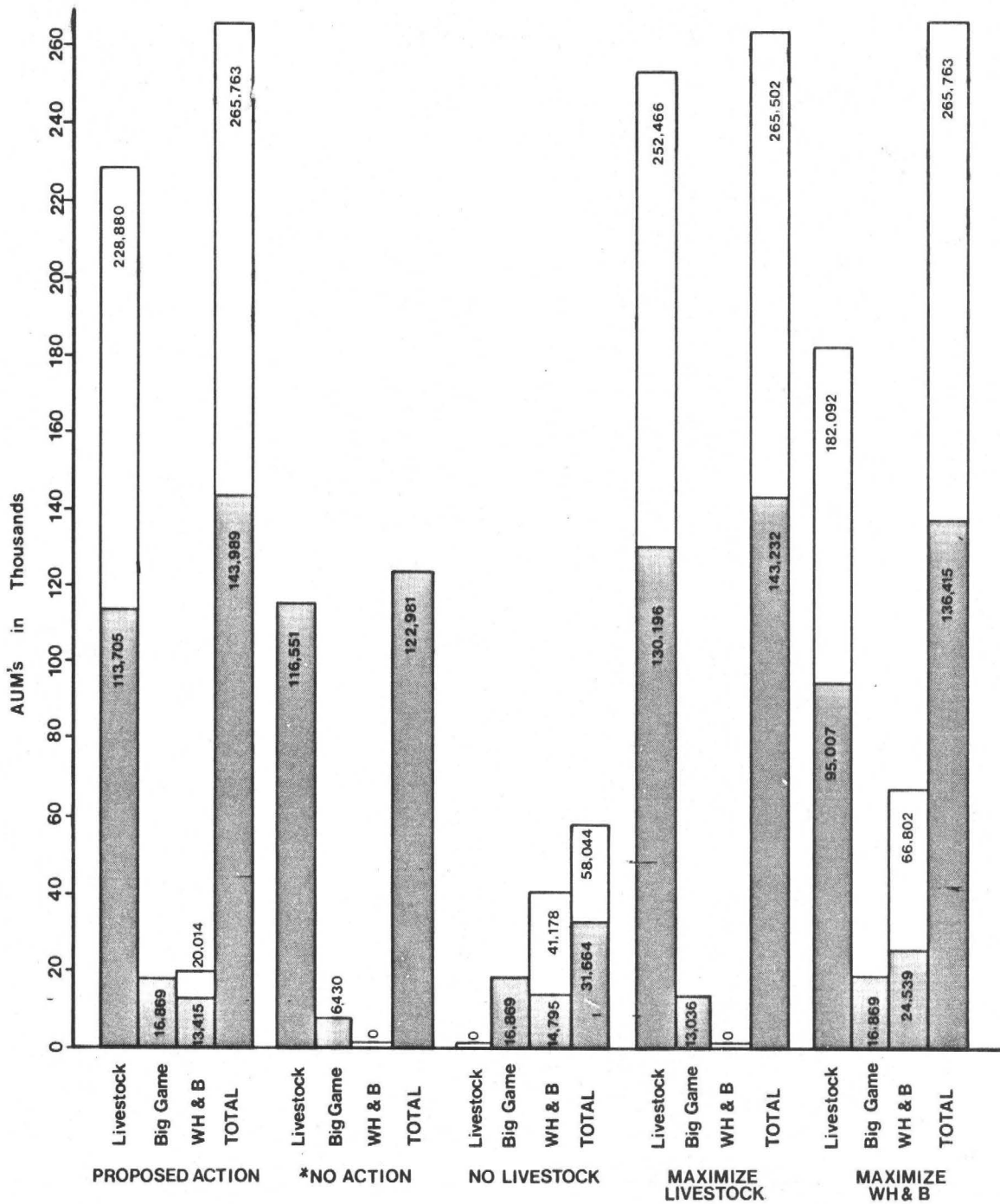
In order to determine areas of concern with the proposed grazing management program in the Sonoma-

Gerlach Resource Area, various interest groups, local and state governments, other federal agencies and numerous individuals were contacted. The allocation of vegetation emerged as a main area of controversy. Of greatest concern was the allocation of vegetation to wildlife and wild horses and burros which was previously allocated to livestock. Another area which drew considerable interest was the total elimination of livestock grazing in the three proposed wild horse and burro herd management areas. The effects on ranch operations resulting from the proposed changes in periods-of-use and the implementation of Allotment Management Plans (AMPs) also generated considerable interest.

Many of these issues will be resolved at the MFP III stage and/or during the implementation stage at which time all interested groups and individuals will be offered the opportunity to join with the Bureau in resolving these and other issues through Coordinated Resource Management and Planning.

The following summary table (Summary Table 1) covers only significant impacts to each resource, broken down by proposed action and alternative. Summary Table 2 shows the development of the Proposed Action through the MFP (planning) process and Summary Tables 3, 4, and 5 outline the vegetation allocations, management levels, and support facilities, respectively, proposed under the various alternatives.

ALLOCATION OF VEGETATION BY ALTERNATIVE



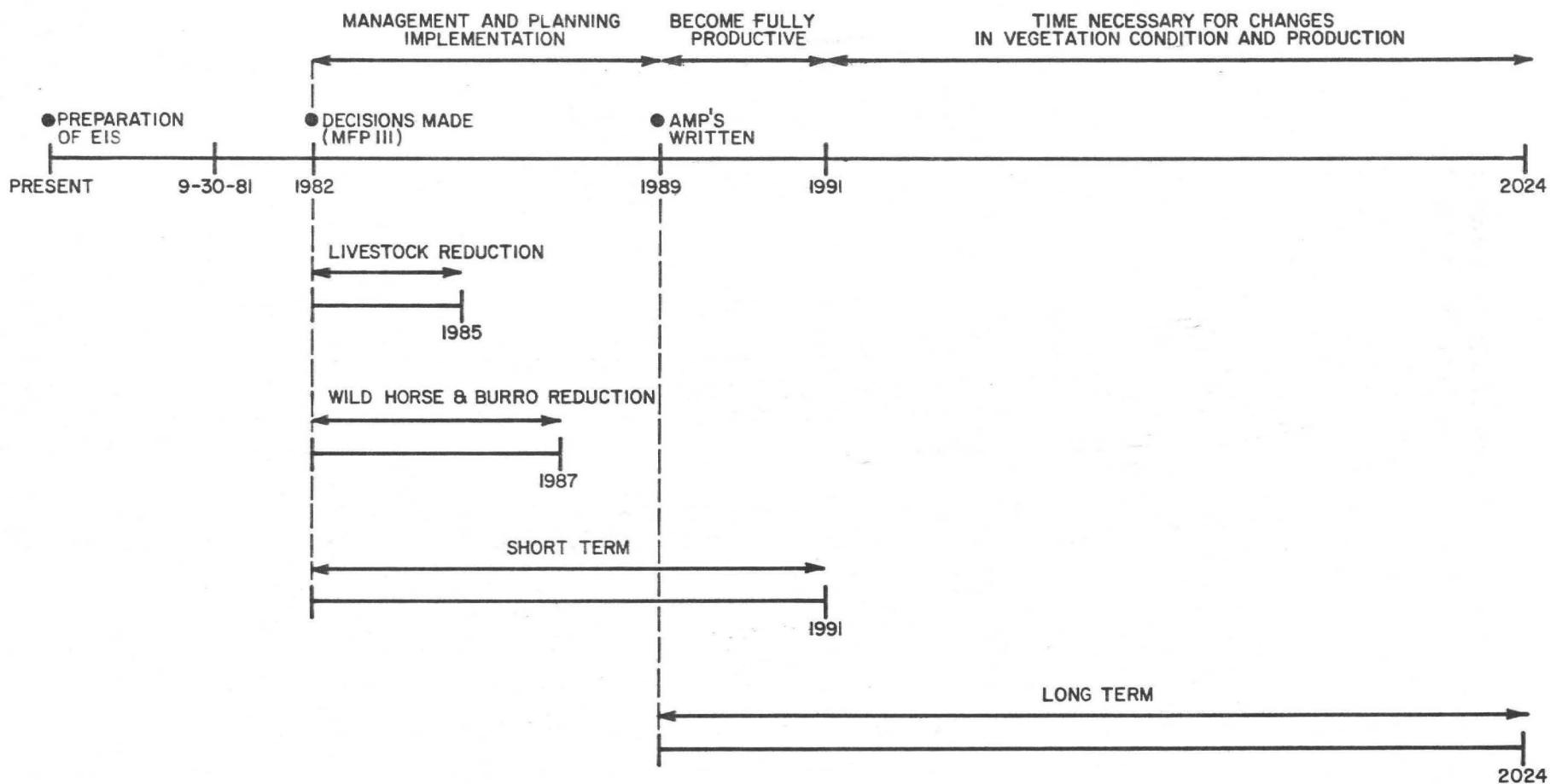
Summary Figure 1

Allocation of vegetation in AUMs under each alternative. In all cases, AUMs for estimated future allocation equal or exceed initial allocations. Shaded areas correspond to initial allocations (1982); white areas correspond to any additional AUMs expected by year 2024.

*No action alternative is also the existing situation.

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SUMMARY FIGURE 2
 TIME FRAMES
 PROPOSED ACTION AND ALTERNATIVES



SOURCE: U.S.D.I., B.L.M., SONOMA-GERLACH E.I.S.

SUMMARY TABLE 1 - Continued
SUMMARY COMPARISON OF SIGNIFICANT IMPACTS

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock Grazing Use	Maximizing Wild Horses and Burros
<u>WATER RESOURCES</u>				
Short and Long-Term Adverse Impacts: 9 streams would exceed turbidity criteria. 3 streams would exceed temperature criteria. 4 streams would exceed coliform bacteria criteria.	Short and Long-Term Beneficial Impacts: 9 streams would not exceed turbidity criteria. 3 streams would not exceed temperature criteria. 4 streams would not exceed coliform bacteria criteria.	Same as proposed action. Same as proposed action. Same as proposed action.	Same as proposed action. Same as proposed action. Same as proposed action.	Same as proposed action. Same as proposed action. Same as proposed action.
<u>VEGETATION</u>				
Short-Term Beneficial Impacts: Vegetation production projected to increase 82,020 AUMs (57 percent); however, eliminating land treatments within WSAs results in 77,011 AUMs (54 percent).	None	None	Short-Term Beneficial Impacts: Vegetation production projected to increase 85,550 AUMs (60 percent); however, eliminating land treatments within WSAs results in 78,332 AUMs (55 percent).	Short-Term Beneficial Impacts: Vegetation production projected to increase 82,020 AUMs (57 percent); however, eliminating land treatments within WSAs results in 77,011 (54 percent).
Short-Term Adverse Impacts: Loss of remaining ecological climax on 244,864 acres (6 percent) from rangeland seedings; however, eliminating rangeland seedings within WSAs results in 226,358 (5 percent).	None	None	Short-Term Adverse Impacts: Loss of regaining ecological climax on 259,956 acres (6 percent) from rangeland seedings; however, eliminating rangeland seedings within WSAs results in 228,840 acres (5 percent).	Short-Term Adverse Impacts: Loss of regaining ecological climax on 244,864 acres (6 percent) from rangeland seedings; however, eliminating rangeland seedings within WSAs results in 226,358 acres (5 percent).
Long-Term Beneficial Impacts: Ecological condition and trend projected to improve 10 and 63 percent, respectively. Vegetation production projected to increase 122,535 AUMs (85 percent); however, eliminating land treatments within WSAs results in 117,526 AUMs (82 percent). Aspen communities (non-riparian) projected to improve, but not significantly.	Long-Term Beneficial Impacts: Ecological condition and trend projected to improve 10 and 56 percent, respectively. Vegetation production projected to increase 39,987 AUMs (28 percent). Riparian and aspen communities projected to approach original (climax) plant communities.	None	Long-Term Beneficial Impacts: Ecological condition and trend projected to improve 11 and 64 percent respectively. Vegetation production projected to increase 121,270 AUMs (85 percent); however, eliminating land treatments within WSAs results in 113,052 AUMs (79 percent). Aspen communities (non-riparian) projected to improve, but not significantly.	Long-Term Beneficial Impacts: Ecological condition projected to improve 4 percent, but not significantly. Ecological trend projected to improve 55 percent. Vegetation production projected to increase 122,535 AUMs (85 percent); however, eliminating land treatments within WSAs results in 117,526 AUMs (82 percent). Riparian and aspen communities projected to improve in herd management areas, but not significantly. Also, aspen communities (non-riparian) projected to improve in allotments managed with AMPs, but not significantly.
Long-Term Adverse Impacts: Riparian communities projected to degrade, but not significantly.	None	Long-Term Adverse Impacts: Ecological condition and trend projected to degrade 13 and seven percent, respectively. Vegetation production projected to decrease 29,194 AUMs (20 percent). Riparian and aspen communities and projected to degrade in aspect, condition and trend and/or lose capabilities to regain original (climax) plant communities.	Long-Term Adverse Impacts: Riparian communities projected to degrade, but not significantly.	Long-Term Adverse Impacts: Riparian communities projected to degrade where livestock grazing continues, but not significantly. Aspen communities projected to degrade in allotments not managed with AMPs that have livestock grazing, but not significantly.
<u>LIVESTOCK GRAZING</u>				
Initial (1982) Beneficial Impacts: The livestock allocation of 113,705 AUMs would increase livestock AUMs over the average livestock licensed use in nine allotments.	None	None	Initial (1982) Beneficial Impacts: The livestock allocation of 130,196 AUMs would increase livestock AUMs over the average livestock use in 11 allotments. This also represents a 12 percent increase in livestock AUMs for the resource area.	Initial (1982) Beneficial Impacts: The livestock allocation of 95,007 AUMs would increase livestock AUMs over the average livestock licensed use in seven allotments.
Initial Adverse Impacts: The livestock allocation would reduce livestock AUMs from the average livestock licensed use in 25 allotments. Implementation of the proposed periods-of-use would impact livestock grazing in all allotments.	Initial Through Long-Term Adverse Impacts: No allocation of the vegetation resource to livestock use would result in a detriment to livestock grazing in all allotments. Also, based on permittees dependence on the public rangeland, 40 permittee's livestock operations would be adversely impacted.	None	Initial Adverse Impacts: The livestock allocation would reduce livestock AUMs from the average livestock licensed use in 23 allotments. Implementation of the proposed periods-of-use would impact livestock grazing in all allotments throughout the short-term.	Initial Adverse Impacts: The livestock allocation would reduce livestock AUMs from the average livestock licensed use in 25 allotments. This also represents an 18 percent decrease in livestock AUMs for the resource area. Implementation of the proposed periods-of-use would impact livestock grazing in all allotments throughout the short-term.
Short-Term (1991) Beneficial Impacts: The livestock adjustments to an estimated 192,247 AUMs would result in an increase in livestock AUMs over the average livestock licensed use in 20 allotments. This also represents a 65 percent increase in livestock AUMs for the resource area.	None	None	Short-Term (1991) Beneficial Impacts: The livestock adjustments to an estimated 216,746 AUMs would result in an increase in livestock AUMs over the average livestock licensed use in 23 allotments. This also represents an 86 percent increase in livestock AUMs for the resource area.	Same as Initial Beneficial Impacts.
Short-Term Adverse Impacts: The livestock adjustments would reduce livestock AUMs from the average livestock use in 13 allotments. Proposed periods-of-use would result in four allotments being adversely impacted throughout the long-term.	Same as Initial Adverse Impacts	None	Short-Term Adverse Impacts: The livestock adjustments would reduce livestock AUMs from the average livestock licensed use in 11 allotments.	Same as Initial Adverse Impacts.
Long-Term (2024) Beneficial Impacts: The livestock adjustments to an estimated 228,880 AUMs would result in an increase in livestock AUMs over the average livestock licensed use in 28 allotments. This also represents a 95 percent increase in livestock AUMs for the resource area. Livestock production would benefit from an increase in calf and lamb crops weaned of five and seven percent, respectively. Livestock production would also benefit from an increase in calf weaning weights of 13 pounds.	None	None	Long-Term (2024) Beneficial Impacts: The livestock adjustments to an estimated 251,466 AUMs would result in an increase in livestock AUMs over the average livestock licensed use in 31 allotments. This also represents a 116 percent increase in livestock AUMs for the resource area. Livestock production would benefit from an increase in calf and lamb crops weaned of five and seven percent, respectively. Livestock production would also benefit from an increase in calf weaning weights of 13 pounds.	Long-Term (2024) Beneficial Impacts: The livestock adjustments to an estimated 182,092 AUMs would result in an increase in livestock AUMs over the average livestock licensed use in 21 allotments. This also represents a 56 percent increase in livestock AUMs for the resource area. Livestock production would benefit from an increase in calf and lamb crops weaned of five and seven percent, respectively. Livestock production would also benefit from an increase in calf weaning weights of 13 pounds.

SUMMARY TABLE 1 - Continued
SUMMARY COMPARISON OF SIGNIFICANT IMPACTS

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock Grazing Use	Maximizing Wild Horses and Burros
Long-Term Adverse Impacts: The livestock adjustments would reduce livestock AUMs from the average livestock licensed use in seven allotments.	Same as Initial Adverse Impacts	Long-Term Adverse Impacts: Livestock production would decline due to a loss in calf and lamb crops weaned, and also, a decline in calf and lamb weaning weights.	Long-Term Adverse Impacts: The livestock adjustments would reduce livestock AUMs from the average livestock licensed use in five allotments.	Long-Term Adverse Impacts: The livestock adjustments would reduce livestock AUMs from the average livestock licensed use in 13 allotments.
<u>WILDLIFE</u>				
Beneficial Impacts: Reasonable number of deer attained or maintained in all but three allotments; antelope would attain reasonable numbers in all but three allotments. Habitat would be provided for 845 sheep. Sage grouse would increase 30 percent. Big game habitat conditions improve.	Beneficial Impacts: Reasonable numbers of all big game species attained in all allotments; sage grouse increase 50 percent; big game, riparian habitat improve in condition.	None	Beneficial Impacts: Mule deer attain, maintain reasonable numbers in 23 allotments, big game habitat improves. Sage grouse increase 20 percent.	Beneficial Impacts: Impacts to wildlife same as proposed action.
Adverse Impacts: Reasonable numbers of deer, antelope not attained in three allotments each; riparian habitat declines in condition.	None	Adverse Impacts: No big game species attains or maintains reasonable numbers in any allotment; sage grouse decline 50 percent; all habitats decline in condition. Significantly adverse impact to mule deer reduced by 1,540.	Adverse Impacts: Mule deer fail to attain, maintain reasonable numbers in 13 allotments, antelope fail to attain reasonable numbers in any allotment, bighorn sheep fail to attain reasonable numbers in Buffalo Hills Allotment, other reintroductions cancelled. Riparian habitat declines in condition.	Same as proposed action.
<u>AQUATIC HABITAT</u>				
Adverse Impacts: Nine streams would remain in fair or poor condition.	Adverse Impacts: None	Adverse Impacts: Same as proposed action.	Adverse Impacts: Same as proposed action.	Adverse Impacts: Eight streams would remain in poor or fair condition.
Beneficial Impacts: One stream would remain in good to excellent condition.	Beneficial Impacts: Ten streams would improve to or remain in good to excellent condition.	Beneficial Impacts: Same as proposed action.	Beneficial Impacts: Same as proposed action.	Beneficial Impacts: Two streams would improve to or remain in good to excellent condition.
<u>WILD HORSE AND BURRO</u>				
Beneficial Impacts: Improved health and condition of remaining animals. Improved health and condition of removed animals.	Same as proposed action.	Beneficial Impacts: Wild horse and burro removals less than 50 percent of present population.	Beneficial Impacts: Improved health and condition of removed animals.	Beneficial Impacts: Improved health and condition of removed and remaining animals. Increase over existing numbers in the long term.
Adverse Impacts: Reduction of animals greater than 50 percent of present numbers. Reduction in Herd Use Areas from present. Death loss due to capture operations of eight percent.	Same as proposed action.	Adverse Impacts: Reduced health and condition of remaining animals. Death loss due to capture operations of eight percent.	Adverse Impacts: Total removal of wild horses and burros and elimination of all Herd Use Areas. Death loss due to capture operations of eight percent.	Adverse Impacts: Reduction greater than 50 percent in the initial allocation. Reduction of Herd Use Areas below present numbers. Death loss of eight percent due to capture operations.
<u>VISUAL RESOURCES</u>				
Adverse Impacts: Potential impacts from land treatments on 15,490 Acres of VRM Class II and 18,004 acres of VRM Class III.	None	None	Adverse Impacts: Potential impacts from land treatments on 560 acres of VRM Class II and 1,910 acres of VRM Class III.	Same as proposed action.
<u>CULTURAL RESOURCES</u>				
Adverse Impacts: Trampling damage from livestock, wild horses and burros which would result in breakage, displacement, rubbing and mixing of cultural strata. Construction of livestock support facilities would adversely affect 97 known cultural resource sites. Grazing-related erosion would occur.	Adverse Impacts: Wild horse and burro trampling damage which would result in breakage, displacement, rubbing, and mixing of cultural strata. Construction of livestock support facilities would adversely affect 97 known cultural resource sites. Grazing-related erosion would occur.	Same as proposed action. Grazing-related erosion would occur.	Same as proposed action. Construction of livestock support facilities would adversely affect 105 known cultural resource sites. Grazing-related erosion would occur.	Same as proposed action. Construction of livestock support facilities would adversely affect 125 known cultural resource sites. Grazing-related erosion would occur.
None	Beneficial Impacts: Elimination of livestock trampling.	None	None	None
<u>RECREATION</u>				
Adverse Impacts: Wildlife numbers would increase but would not meet hunting demand. Stream fishing availability would not meet demand.	Same as proposed action.	Adverse Impacts: Wildlife numbers would decrease and would not meet hunting demand. Same as proposed action.	Same as proposed action.	Same as proposed action.

SUMMARY TABLE 1 - Continued
SUMMARY COMPARISON OF SIGNIFICANT IMPACTS

SUMMARY TABLE 1 - Continued
SUMMARY COMPARISON OF SIGNIFICANT IMPACTS

Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock Grazing Use	Maximizing Wild Horses and Burros
<u>SOCIAL CONDITIONS</u>				
<u>Ranching Community</u>				
<u>Initial Adverse Impacts</u> AUM reductions and changes in periods-of-use may cause many ranchers to go out of business, relocate, become employees of agribusinesses or take non-agricultural jobs. Non-monetary values associated with ranching may be lost, quality of life reduced, and anxieties about future increased. Those who stay in ranching could experience decreased property values, increased difficulties in obtaining loans, reduced income, and decreased quality of life. Acceleration of ranch consolidation could occur threatening traditional rural community.	<u>Initial Adverse Impacts</u> Similar to proposed action but more ranchers would be likely to go out of business.	<u>Initial Through Long-Term Adverse Impacts</u> No additional range improvement, and continuing problems with wild horses. Decline in livestock production in long term could result in adverse social impacts similar to initial impacts of proposed action but occurring at a more gradual rate.	<u>Initial Adverse Impacts</u> Similar to proposed action but less adverse due to fewer and less drastic AUM reductions.	<u>Initial Adverse Impacts</u> Similar to proposed action though slightly less adverse.
<u>Short-Term Beneficial Impacts</u> Some ranchers or ranch heirs (particularly in small class) who stay in business could experience slightly improved quality of life due to economic gains.	None	None	<u>Short-Term Beneficial Impacts</u> Similar to proposed action.	<u>Short-Term Beneficial Impacts</u> Similar to proposed action.
<u>Long-Term Beneficial Impacts</u> Members of all ranch classes who stay in business could experience improved herd condition, economic gains, enhanced quality of life, improved property values and improved loan eligibility.	None	None	<u>Long-Term Beneficial Impacts</u> Similar to proposed action but benefits greater.	<u>Long-Term Beneficial Impacts</u> Similar to proposed action.
<u>Regional</u>				
<u>Initial Through Short-Term Adverse Impacts</u> Loss of ranchers or rancher business would result in social, cultural, and economic losses to EIS area residents. Community cohesion and context and quality of life individuals could be impacted. Increased antagonism toward BLM and federal government.	<u>Initial Through Short-Term Adverse Impacts</u> Same as initial and short-term impacts of proposed action but more adverse due to greater losses or ranchers and rancher business.	None	<u>Initial Through Short-Term Adverse Impacts</u> Similar to proposed action.	<u>Initial Through Short-Term Adverse Impacts</u> Similar to proposed action.
<u>Long-Term Beneficial Impacts</u> Increased quality of life for individuals benefiting from rancher business.	None	None	<u>Long-Term Beneficial Impacts</u> Similar to proposed action.	<u>Long-Term Beneficial Impacts</u> Similar to proposed action.
<u>Long-Term Adverse Impacts</u> Social and cultural losses and impacts to community context and cohesion would persist if there is continued absence of family-run ranches from area.	<u>Long-Term Adverse Impacts</u> Same as short-term	<u>Long-Term Adverse Impacts</u> Impacts similar to proposed action initial through short term impacts may occur but at more gradual rate.	<u>Long-Term Adverse Impacts</u> Same as proposed action	<u>Long-Term Adverse Impacts</u> Same as proposed action
<u>State and National</u>				
<u>Wild Horse Protection Groups</u>				
<u>Beneficial Impacts</u> Perceptual benefits from fence removals, water developments and priority removal from checkerboard lands, and improved health of animals.	<u>Beneficial Impacts</u> Perceptual impacts from horses remaining in natural environment, fence removals, and improved health of animals.	<u>Beneficial Impacts</u> Perceptual impacts from horses remaining in natural environment.	<u>Beneficial Impacts</u> None	<u>Beneficial Impacts</u> Same as proposed action except more animals would remain in natural environment and animal numbers would increase in long term. Most acceptable alternative to group members.
<u>Adverse Impacts</u> Perceptual impacts due to confinement of animals to HMAs and reductions in animals considered excessive by group members.	<u>Adverse Impacts</u> Perceptual impacts due to reductions in animals considered excessive by group members.	<u>Adverse Impacts</u> Perceptual impacts to many members from reduced health and vigor of animals.	<u>Adverse Impacts</u> Perceptual impacts from complete removal of wild horses and burros. Loss of viewing opportunities and what members feel to be important part of national heritage.	<u>Adverse Impacts</u> Initial reductions considered to be greater than necessary.
<u>Conservation, Wildlife Recreation Groups</u>				
<u>Beneficial Impacts</u> Improved quality of perceptual, recreational, and educational opportunities due to improvements in range conditions, non-riparian, big game habitat, slight increases in sage grouse and antelope populations, bighorn sheep introductions and fence removals.	<u>Beneficial Impacts</u> Improved quality of perceptual, recreational, and educational opportunities due improvements in range condition, big game, riparian, and aquatic habitats, water quality, and increases in sage grouse and big game numbers.	<u>Beneficial Impacts</u> None	<u>Beneficial Impacts</u> Similar to proposed action except for decreases in antelope and bighorn sheep.	<u>Beneficial Impacts</u> Similar to proposed action.
<u>Adverse Impacts</u> Decreased quality of perceptual, recreational, and educational experiences on public lands due to deterioration of water quality and riparian zones and slight decreases in mule deer numbers as well as deteriorated condition of aquatic habitat.	<u>Adverse Impacts</u> Most group members favor multiple use of public lands and would not advocate this alternative.	<u>Adverse Impacts</u> Decrease quality of experiences on public lands due to deteriorated range condition, aquatic and wildlife habitats, and wildlife numbers.	<u>Adverse Impacts</u> Decreased quality of experiences on public lands due to deterioration of water quality, decreases in mule deer, antelope and bighorn sheep and deterioration of riparian and aquatic habitat.	<u>Adverse Impacts</u> Similar to proposed action

SUMMARY TABLE 1 - Continued
SUMMARY COMPARISON OF SIGNIFICANT IMPACTS

SUMMARY TABLE 1 - Continued
 SUMMARY OF SIGNIFICANT ECONOMIC IMPACTS 1/
 SONOMA-GERLACH RESOURCE AREA

Alternatives	INITIAL IMPACTS						SHORT TERM IMPACTS						LONG TERM IMPACTS						
	Individual Level		Sectoral Level		Areawide Level		Individual Level		Sectoral Level		Areawide Level		Individual Level		Sectoral Level		Areawide Level		
	Income	Employment 2/	Income	Employment	Income	Employment	Income	Employment	Income	Employment	Income	Employment	Income	Employment	Income	Employment	Income	Employment	
PROPOSED ACTION																			
Ranch Sector	-1,127,000	- 32	-1,127,000	- 32	-1,127,000	- 32	-1,031,000	- 21	-1,031,000	- 23	-1,031,000	- 23	+ 425,000	+ 31	+ 425,000	+ 31	+ 425,000	+ 31	
Construction Sector	+ 118,000	+ 8					+ 118,000	+ 8											
Government Sector	+ 105,000	+ 7					+ 105,000	+ 7											
Trade and Service Sector							+ 5,000	+ 1					+ 5,000	+ 1					
Rancher Wealth 3/	-1,937,000						+1,990,000						+3,822,000						
EIS Area Economy 4/	-2,083,000	- 38	-2,083,000	- 38	-2,083,000	- 38	-1,875,000	- 20	-1,875,000	- 20	-1,875,000	- 20	+ 899,000	+ 57	+ 899,000	+ 57	+ 899,000	+ 57	
NO LIVESTOCK GRAZING 5/																			
Ranch Sector	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	-2,206,000	- 85	
Construction Sector	+ 18,000	+ 0					+ 18,000	+ 0											
Government Sector	- 90,000	- 6					- 90,000	- 6											
Trade and Services Sector							+ 9,000	+ 1					+ 9,000	+ 1					
Rancher Wealth 3/	-7,622,000						-7,622,000						-7,622,000						
EIS Area Tax Revenue	- 40,000	- 1					- 40,000	- 1					- 40,000	- 1					
EIS Area Economy	-4,750,000	-164	-4,750,000	-164	-4,750,000	-164	-4,741,000	-164	-4,741,000	-164	-4,741,000	-164	-4,628,000	-164	-4,628,000	-164	-4,628,000	-164	
NO ACTION																			
Trade and Services Sector							- 5,000	- 1					- 18,000	- 3					
	NO OTHER SIGNIFICANT ECONOMIC IMPACTS WOULD BE EXPECTED FROM THIS ALTERNATIVE																		
MAXIMIZE LIVESTOCK																			
Ranch Sector	-1,112,000	- 31	-1,112,000	- 31	-1,112,000	- 31	-1,011,000	- 21			-1,011,000	- 21	+ 408,000	+ 32	+ 408,000	+ 32			
Construction Sector	+ 126,000	+ 7					+ 126,000	+ 7											
Government Sector	+ 105,000	+ 7					+ 105,000	+ 7											
Trade and Services Sector			NOT SIGNIFICANT																
Rancher Wealth 3/	-1,113,000						+3,215,000						+4,951,000						
EIS Area Economy	-2,038,000	- 35	-2,038,000	- 35	-2,038,000	- 35	-1,825,000	- 17	-1,825,000	- 17	-1,825,000	- 17	+ 859,000	+ 57	+ 859,000	+ 57	+ 859,000	+ 57	
MAXIMIZE WILD HORSES & BURROS																			
Ranch Sector	-1,147,000	- 32	-1,147,000	- 32	-1,147,000	- 32							+ 316,000	+ 21	+ 316,000	+ 21			
Construction Sector	+ 68,000	+ 4																	
Government Sector	+ 105,000	+ 7																	
Trades and Services Sector													+ 5,000	+ 1					
Rancher Wealth 3/	-2,872,000												+1,482,000						
EIS Area Economy	-2,183,000	- 46	-2,183,000	- 46	-2,183,000	- 46							+ 670,000	+ 39	+ 670,000	+ 39	+ 670,000	+ 39	

1/ Significant adverse economic impacts are denoted by a minus (-) sign, while significant beneficial impacts are denoted by a plus (+).
 2/ Employment was calculated on the basis of Full Time Equivalent, with a 2,000 hour work year constituting one FTE.
 3/ The Impact to Rancher Wealth should not be interpreted as an actual income impact.
 4/ Pershing and Humboldt county data was summed in order to accurately portray the EIS area economy.
 5/ Short and long term impacts of the No Grazing alternative are similar to the initial impacts.

Source: U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Sonoma-Gerlach EIS Team, 1980.

SUMMARY TABLE 1 - Continued
 SUMMARY OF SIGNIFICANT ECONOMIC IMPACTS 1/
 SONOMA-GERLACH RESOURCE AREA

SUMMARY TABLE 2
DEVELOPMENT OF THE PROPOSED ACTION THROUGH THE
MANAGEMENT FRAMEWORK PLAN (MFP)

MFP STEP I RECOMMENDATIONS	CONFLICTS	MFP STEP II RECOMMENDATIONS	RATIONALE	TRADE OFFS
Allocate all suitable livestock forage within the resource area to livestock.	<u>Lands</u> Retain public lands around Gerlach and Empire for future municipal expansion.	Accept the recommendation for Gerlach and Empire.	The lands near Gerlach and Empire are the most logical in which to assume that future community expansion would occur.	26 AUMs would not be available for livestock.
	<u>Forestry & Wildlife</u> Consider aspen and mahogany as "critical" management species and designate as Areas of Critical Environmental Concern (ACEC)	Modify recommendation as follows: in design, implementation, or revision of grazing management systems, horse management areas, or horse use areas, consider aspen and mahogany as "critical" management species.	Coordinated planning efforts on an area should develop realistic objectives for these critical management species.	Insignificant.
	<u>Wild Horse & Burro</u> Designate 4 herd management areas and 11 herd use areas for management of wild horses.	Modify recommendation as follows: designate 3 herd management areas.	Restriction of wild horses & burros to HMA would permit effective, intensive livestock management on non-HMAs.	4,445 horses (53,340 AUMs) would be removed from the resource area.
	<u>Wildlife</u> Provide forage for reasonable number of big game by adjusting livestock allocation.	Accept.	Balancing available forage among all grazing animals would help reverse the unsatisfactory ecological range condition.	13,140 AUMs would be allocated to big game out of a total 140,260 AUMs.
	<u>Wildlife</u> Reserve a majority of available forage in Granite Range for a wildlife management area (WMA) or as Area of Critical Environmental Concern (ACEC).	Accept as ACEC.	This area is the most important wildlife habitat in the resource area.	Insignificant.
	<u>Wildlife (Aquatic)</u> Designate following areas as ACECs - Mahogany Creek & its watershed, & Soldier Meadows Warm Springs.	Accept.	These areas should be afforded the special management attention that ACEC classification/designation would require.	Insignificant.
	<u>Watershed</u> Protect the plants from surface disturbance or adverse management actions.	Accept.	It is Bureau policy to protect, conserve, & manage Federal & State T/E plants.	Trade off insignificant.
Establish periods-of-use for each allotment & base management on the physiological requirements of key species.	Same as above for Wild Horse & Burro & Wildlife (Aquatic)	Accept.	The establishment of a period-of-use based upon the physiological requirements of key management species would help to reverse the declining range conditions & would lead to a sustained yield vegetation resource.	Elimination of year-round

Source: U.S. Department of the Interior, Bureau of Land Management, Winnemucca District, Sonoma-Gerlach Management Framework Plan 1980.

SUMMARY TABLE 3
PROPOSED VEGETATION ALLOCATION PROGRAM (AUMs)

Type of Action	Proposed Initial Allocation (1982)				Proposed Short-Term Adjustments (1991)				Proposed Long-Term Adjustments (2024)			
	Livestock	Big Game	Wild Horses and Burros	Total	Livestock	Big Game	Wild Horses and Burros	Total	Livestock	Big Game	Wild Horses and Burros	Total
Proposed Action	113,705	16,859	13,415	143,989	192,247	16,869	16,625	225,741	228,880	16,869	20,014	265,763
No Action	116,551 <u>a/</u>	6,430	0	122,981	116,551 <u>a/</u>	6,430	0	122,981	116,551 <u>a/</u>	6,430	0	122,981
Livestock Grazing	0	16,869	14,795	31,664	0	16,869	14,795	31,664	0	16,869	41,175	58,044
Maximizing Livestock Use	130,196	13,036	0	143,232	216,746	13,036	0	229,782	251,466	13,036	0	264,502
Maximizing Wild Horse and Burro	95,007	16,869	14,795	126,671	95,007	16,869	14,795	126,671	182,092	16,869	66,802	265,763

a/ Livestock use for the No Action alternative is based on the last three to five year average livestock licensed use. This excludes 1,644 AUMs of documented three year average trespass use.

Source: Sonoma-Gerlach EIS Team 1980.

SUMMARY TABLE 4
PROPOSED LEVELS OF GRAZING MANAGEMENT

Type of Action	Intensive Management <u>a/</u>		Non-Intensive Management <u>b/</u>		Update Current Allotment Management Plan <u>c/</u>		No Livestock Grazing <u>d/</u>	
	Allotments	Acres	Allotments	Acres	Allotments	Acres	Allotments	Acres
Proposed Action	26	3,534,580	3	165,301	8	541,568	1	18,393
No Action	8	541,568	30	3,718,274	0	0	0	0
No Livestock Grazing	0	0	38	4,259,842	0	0	0	0
Maximizing Livestock Use	30	3,718,274	0	0	8	541,568	0	0
Maximizing Wild Horse and Burro	24	3,327,301	3	165,301	8	541,568	3	225,672

a/ Those allotments that would have a specified grazing system under an Allotment Management Plan (AMP).

b/ Those allotments that would not have an Allotment Management Plan.

c/ Those allotments that would have an updating of the current Allotment Management Plan.

d/ Those allotments where there would be no livestock grazing allowed.

Source: Sonoma-Gerlach EIS Team 1980.

SUMMARY TABLE 5
PROPOSED LIVESTOCK SUPPORT FACILITIES

Type of Action	Proposed Facilities						Land Treatments (Acres)			Estimated Cost (Dollars)	
	Wells	Pipelines (Miles)	Springs	Troughs	Fences (Miles)	Fence Removal (Miles)	Cattleguards	Sagebrush Control	Seed and/or Reseed		Sagebrush Control Then Seed
Proposed Action	42.0	15.5	8.0	102.0	399.0	0	18.0	0	14,752	230,112	\$16,058,680
No Action	0	0	0	0	0	0	0	0	0	0	0
No Livestock Grazing	0	0	0	0	0	275.1	0	0	0	0	\$ 990,360
Maximizing Livestock Use	44.0	15.5	8.0	106.0	411.0	0	19.0	21,290	16,172	243,784	\$17,320,390
Maximizing Wild Horse and Burro	42.0	15.5	8.0	102.0	692.0	31.9	18.0	0	14,752	230,112	\$17,129,430

Source: Sonoma-Gerlach EIS 1980.

SUMMARY TABLE 6
RELATIONSHIP BETWEEN THE GENERAL OBJECTIVES AND THE ALTERNATIVES a
SONOMA-GERLACH RESOURCE AREA

General Objectives	Proposed Action	No Livestock Grazing	No Action	Maximizing Livestock Grazing	Maximizing Wild Horse and Burro
(1) Improve habitat and rangeland conditions for livestock, wildlife, and wild horses and burros by allocation of available vegetation within the productive capacity of the vegetation resource.	Meets objective	Meets objective	Does not meet objective	Meets objective	Meets objective
(2) Enhance 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 meet objective	All wildlife meet objective	All wildlife do not meet objective	All wildlife meet objective	All wildlife meet objective
(6) Improve 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, Sonoma-Gerlach Environmental Impact Statement Team 1980.

TABLE OF CONTENTS

ERRATA

Chapter 1 1
Chapter 2 1
Chapter 3 1
Bibliography. 1

CHAPTER 5

PUBLIC PARTICIPATION. 3

Consultation and Coordination 3
Scoping 3
Interagency Contacts. 3
Agencies, Organizations, and Persons to Whom Copies of the
Draft and Final Were Sent 3
Locations Where Final EIS is Available. 4
Public Review and Hearing 5
Consultation and Coordination in Reviews of the EIS 5
Availability of the Final EIS 5
Introduction to Responses 6

LIST OF FIGURES

2-3 Average Phenology of Management Species on the Winnemucca
District. 2

ERRATA

ERRATA

Chapter 1

In Table 1-6, DEIS page 1-12, add the following two footnotes:

d. Soldier Meadow-Paiute was arbitrarily given first priority because of the presence of a threatened species. Buffalo Hills-Calico was given second priority because of the presence of a large Area of Critical Environmental Concern (ACEC) and because of the wildlife values present. The other allotments in this group were assigned priority based on severity of reductions, potential for increasing carrying capacity through management, and condition of the soil and vegetation resources and the degree of deterioration. Priority may change because of management need or other reasons.

e. Allotments in this group were prioritized based on potential for increasing carrying capacity through management.

Chapter 2

In the fifth sentence under "Sensitive Plants", on DEIS page 2-7, remove the word "Proposed" from the title. Also change the comment following the title to: provides additional information on status, recommendations, and habitats for Nevada Sensitive Plants.

Following the fifth sentence under "Sensitive Plants", on DEIS page 2-7, add the following sentence: A revised "Notice of Review" was published by the U.S. Fish and Wildlife Service on December 15, 1980 in the *Federal Register* listing those plants recommended for federal listing. A draft of this list was consulted at the November 20-21, 1980 Nevada Threatened and Endangered Plant Workshop in Reno, Nevada. The results of this workshop, therefore, provide the most current recommendations for Nevada sensitive plants.

Several items were omitted on Figure 2-3 (Average Phenology of Management Species on the Winnemucca District) on page 2-8 of the DEIS. See additions to Figure 2-3—FEIS.

In Table 2-2, DEIS page 2-9, *Lomatium ravenii* is deleted from the list and change *Phacelia glaberrims* from T to S status. Change second line of footnote 'a' to read November 20-21, 1980. Under source, change date of workshop to November 20-21, 1980. Also, under source, fourth line, delete "Proposed" from the title.

In Table 2-8, DEIS page 2-22, under Current Conflicts, third line down should list Livestock.

Chapter 3

The first sentence under the heading "Impacts on Sensitive Plants," DEIS page 3-22 should read three plants recommended for threatened status, etc.

Bibliography

The fifth entry on the right hand column under Wilson etc., DEIS page 6-101, add 1978.

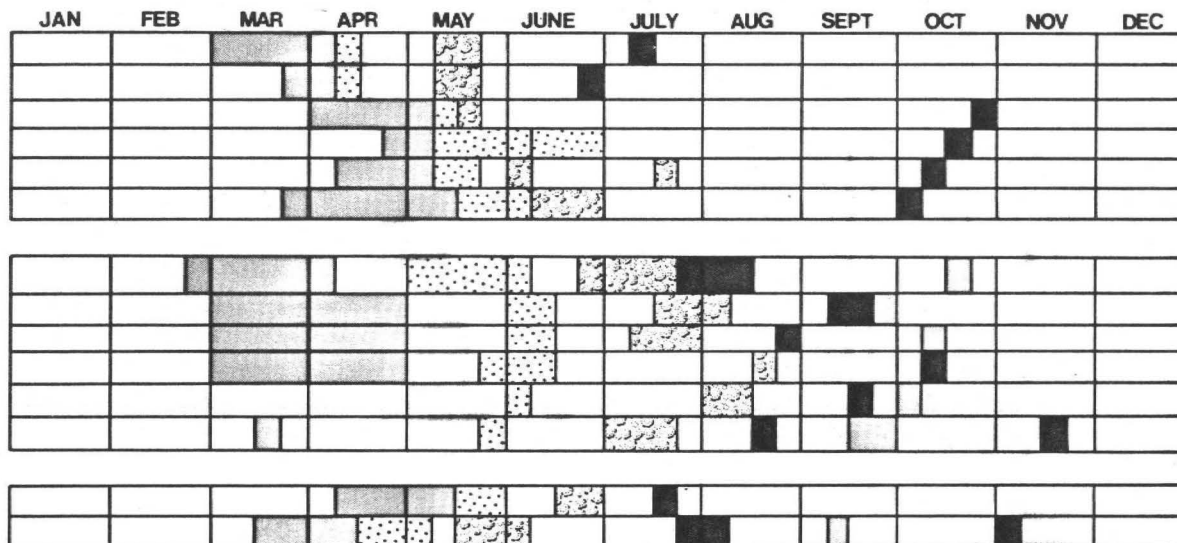
FIGURE 2-3

SHRUBS AVERAGE PHENOLOGY OF MANAGEMENT SPECIES ON THE WINNEMUCCA DISTRICT a/

- bud sagebrush (*Artemisia spinescens*)
- spiny hopsage (*Grayia spinosa*)
- willow (*Salix* spp.)
- serviceberry (*Amalanchier alnifolia*)
- snowberry (*Symphoricarpos* spp.)
- Mormon-tea (*Ephedra*)

- GRASSES
- bottlebrush squirreltail (*Sitanian hystrix*)
 - bluebunch wheatgrass (*Agropyron spicatum*)
 - Thurber needlegrass (*Stipa thurburiana*)
 - Basin wildrye (*Elymus cinereus*)
 - Idaho fescue (*Festuca idahoensis*)
 - Indian ricegrass (*Oryzopsis hymenoides*) b/

- FORBS
- tapertip hawksbeard (*Cepis acuminata*)
 - globemallow (*Shaeralcea* spp.)



KEY

Symbol	Shrubs	Grasses	Forbs
■	Leaf Growth	Growth Starts	Growth Starts
●	Twig Growth	Flower Stalks Appear	Flow Stalks Appear
■	Full Bloom	Seed Dissemination	Full Bloom
■	Leaves Dry & Drop	Plants Dry	Plants Dry

a/ No data available for *Populus tremuloides*, *Ceratoides lanata*, *Balsamorhiza hookeri*, *Purshia tridentata*, *Cercocarpus ledifolius*, *Poa nevadensis*, *Agropyron cristatum*, *Stipa comata*, *Oryzopsis webberi*, and *Balsamorhiza sagittata*, also key management species. Data taken from Nevada Rangeland Phenology, Bureau of Land Management 1976 to 1979. Published by Natural Resources Consultants. Winnemucca District Phenology Study Sites.

b/ Data taken from Nevada Rangeland Phenology, Bureau of Land Management, 1976 to 1979. Published by Natural Resource Consultants. Battle Mountain District Phenology Study Sites.

CHAPTER 5
PUBLIC PARTICIPATION

CHAPTER 5

PUBLIC PARTICIPATION

CONSULTATION AND COORDINATION IN DEVELOPMENT OF THE PROPOSAL AND ALTERNATIVES

Consultation and coordination with all interested parties have been important components in the development of the Sonoma-Gerlach planning/MFP/EIS process, and will continue to play a vital role as the process moves into the final EIS, MFP Step III, decision document, and implementation stages. Each of these stages contains provisions for consultation and coordination through such means as comment periods, informational meetings, news releases, and Coordinated Resource Management and Planning.

In October 1978, a state-wide news release announced the due dates for several EISs, including the Sonoma-Gerlach, and explained why the EISs were being prepared. A public meeting 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 process.

In June and July, 1980, notice of intent to prepare the Sonoma-Gerlach EIS was published in the *Federal Register* and through news releases to the local and regional media. The notices, as well as individual letters, invited interested parties to take part in the EIS process. In July, briefings were held for the Washoe, Humboldt, and Pershing county commissioners and a formal meeting was held with the Nevada State Clearinghouse.

SCOPING

During late July, public scoping meetings for the EIS were held in Gerlach, Lovelock, and Winnemucca. Also, during June through October, consultations were scheduled by appointment with interested individuals and agencies, including livestock permittees in the resource area. Letters of appreciation were sent to persons who responded with information, and all information gathered during the scoping process was considered in developing the alternatives in the EIS.

INTERAGENCY CONTACTS

Professional contacts have been made with the Nevada Department of Wildlife, the U. S. Fish and Wildlife Service, and the USDA Soil Conservation Service.

Coordination will be initiated with the Nevada

Department of Highways should fencing of pasture and allotment boundaries occur along highway rights-of-way. Also applications for water rights will be filed with the Nevada State Water Engineer for water projects.

Informal consultation on the possible existence of threatened or endangered plants is scheduled with the U.S. Fish and Wildlife Service. The State Historic Preservation Officer was consulted on possible impacts to cultural resources.

The Economics, Statistics, and Cooperatives Service (ESCS), U.S. Department of Agriculture, provided economic data for use in the EIS. These data were based on meetings with area ranchers and budget information gathered by the ESCS as part of a nation-wide study.

AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THE DRAFT AND FINAL EISs WERE SENT:

An asterisk indicates those who commented on the draft EIS.

CONGRESSIONAL

Senator Howard Cannon
Senator Paul Laxalt
Congressman James Santini

FEDERAL AGENCIES

Advisory Council on Historic Preservation
Department of Agriculture
Agricultural Stabilization and Conservation Service
Farmers Home Administration
Forest Service
Soil Conservation Service
Department of Defense
Department of the Air Force
Department of Energy*
Department of the Interior
Bureau of Indian Affairs
Bureau of Mines*
Water and Power Resources Service (now Bureau of Reclamation)
U. S. Geological Survey*
Fish and Wildlife Service
Heritage Conservation and Recreation Service
Environmental Protection Agency*

STATE AGENCIES

Office of the Governor, Nevada*
Nevada State Planning Coordinator
Nevada State Clearinghouse*—25 copies—
distributes copies to State Agencies
Nevada Department of Wildlife
Legislative Counsel Bureau

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 AGENCIES

Mayor of Winnemucca
Mayor of Lovelock
Humboldt County Commissioners
Humboldt Planning Commission
Pershing County Commissioners
Churchill County Commissioners
Lyon County Commissioners
Washoe County Commissioners
Big Meadow Conservation District
Sonoma Conservation District

UNIVERSITY OF NEVADA

Max C. Fleischmann College of Agriculture
Division of Agricultural and Resource Economics
Division of Animal Science
Division of Renewable Natural Resources
Desert Research Institute, Las Vegas and Reno
Mackay School of Mines

EXTENSION AGENTS

Humboldt County
Pershing County
Churchill County
Lyon County
Washoe County

NEVADA STATE LEGISLATORS

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

OTHERS

Ada County Fish and Game League, Idaho
American Fisheries Society
American Horse Protection Association, Inc.
American Humane Association
Animal Protection Institute
Audubon Society, Lahontan Chapter
Department of Biological Sciences, Northern Illinois University
Desert Bighorn Council
Enviro Technics, Inc.
Exploration Geologists of Nevada

Foresta Institute
Friends of Nevada Wilderness
Friends of the Earth
Grazing permit holders within Sonoma-Gerlach Resource Area
National Council of Public Land Users, Colorado*
National Rifle Association
Nationwide Forest Planning Clearinghouse
Natural Resources Defense Council
Nevada Cattlemen's Association*
Nevada Outdoor Recreation Association/National Public Lands Task Force
Nevada Woolgrower's Association
Northern Nevada Native Plant Society
Oregon Environmental Council
Pacific Legal Foundation
Pennsylvania Cooperative Wildlife Research Unit
Private citizens who have requested a copy of the DEIS
Public Lands Council
Sage County Alliance for a Good Environment
Society for Range Management
Sierra Club
Sterns-Roger Engineering
Toiyabe Chapter of the Sierra Club*
Wilderness Society
Wild Horse Organized Assistance*
Wildlife Management Institute*

OTHERS WHO RESPONDED ARE:

Pershing County Sportmens' Association
International Society for the Protection of Mustangs and Burros
Wildlife Society
Eisenhower, Carlson, Newlands, Reha, Henriot and Quinn Law Offices

PERMITTEES WHO RESPONDED ARE:

Tony Tipton
C-Punch Corporation
Bill Ceresola
Robert Belzarella
Robert Vesco
Marvel Brothers

LOCATIONS WHERE FINAL EIS IS AVAILABLE

The Draft Environmental Impact Statement (DEIS) and the Final Environmental Impact Statement (FEIS) were sent to everyone who requested copies. Others were sent letters of notification regarding availability of the EISs.

Copies of the DEIS and FEIS will be available for review at all BLM District and State Offices including the following locations: (*indicates address to write for copies of the EIS).

BUREAU OF LAND MANAGEMENT OFFICES

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

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

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

Carson City District Office
1050 E. Williams Street
Carson City, Nevada 89701

Elko District Office
2002 Idaho Street
Elko, Nevada 89801

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

Las Vegas District Office
4765 West Vegas Drive
Las Vegas, Nevada 89102

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

PUBLIC LIBRARIES

Churchill Public Library
553 South Main Street
Fallon, Nevada 89406

Humboldt County Library
85 East 5th Street
Winnemucca, Nevada 89445

Lander County Library
Battle Mountain, Nevada 89820

Nevada State Library
Library Building
Carson City, Nevada 89710

Pershing County Library
1125 Central Avenue
Lovelock, Nevada 89419

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

University of Nevada, Reno
Getchall Library
Reno, Nevada 89507

Washoe County Library
301 S. Center Street
Reno, Nevada 89505

PUBLIC REVIEW AND HEARINGS

About 300 copies of the Draft Environmental Impact Statement were sent out during the first week in April with accompanying letters noting the date, place and time of the public meetings and the procedure for the public to submit comments. Also, about 300 letters with information about comments and public hearings were sent to interested parties. About 30 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 *May 22*. A *Federal Register* notice of the release of the DEIS and all pertinent information about hearings and comments was printed on April 2, 1981 and a news release with the same information was sent to area newspapers.

The first public hearing was in Lovelock on April 28 and was attended by five persons. One person testified and no written responses were turned in. The next meeting in Winnemucca on April 29 had six people attending with one person testifying and no written responses. The last hearing was on April 30 in Reno. Nine people attended, two testified and one written response was submitted.

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.

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.

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. A list of respondents to the DEIS follows at the end of this chapter, prior to the printing of the comments and responses.

LIST OF SONOMA-GERLACH DRAFT
ENVIRONMENTAL IMPACT STATEMENT COMMENTS

INDEX NO. AND LETTER

- 1 DEPARTMENT OF ENERGY, LAS VEGAS
- 2 NATIONAL COUNCIL OF PUBLIC LAND USERS
- 3 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
- 4 PERSHING COUNTY SPORTSMEN'S ASSOCIATION
- 5 UNITED STATES DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY
- 6 TIPTON RANCHES
- 7 C-PUNCH CORPORATION
- 8 WILDLIFE MANAGEMENT INSTITUTE
- 9 BILL CERESOLA
- 10 ROBERT BELZARENA
- 11 INTERNATIONAL SOCIETY FOR THE PROTECTION OF
MUSTANGS AND BURROS
- 12 NEVADA STATE PLANNING COORDINATOR
- 13 NEVADA CATTLEMEN'S ASSOCIATION - ELKO
- 14 MARVEL BROTHERS RANCHING COMPANY
- 15 WILDLIFE SOCIETY - NEVADA CHAPTER
- 16 ROBERT VESCO
- 17 SIERRA CLUB
- 18 EISENHOWER, CARLSON, NEWLANDS, REHA, HENRIOT
AND QUINN
- 19 WILD HORSE ORGANIZED ASSISTANCE - WHOA
- 20 ROBERT LIST - GOVERNOR OF NEVADA
- 21 UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF MINES
- 22 RESOURCE CONCEPTS, INC. (Public Hearing in
Reno)

Comment Letter 1



Department of Energy
Nevada Operations Office
P.O. Box 14100
Las Vegas, NV 89114

APR 05 1981

Mr. E. F. Spang
U.S. Department of Interior
Bureau of Land Management
Nevada State Office
P.O. Box 12000
Reno, NV 89520

Dear Mr. Spang:

The Department of Energy, Nevada Operations Office, Las Vegas, has no comments regarding the Draft Sonoma-Gerlach Grazing Environmental Impact Statement (DEIS). (Refer to: 1792 NR09 N-020.)

Thank you for providing us an opportunity to review this document.

Sincerely,

Richard S. Hague, Chief
Containment and Effects Branch

Comment Letter 2

National Council of Public Land Users

P. O. Box 811
Grand Junction, Colorado 81501

Paul Maxwell, President

9 Apr 81

Herbert Snyder, Secretary

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

Dear Sir:

The draft grazing environmental impact statement on the Nevada Gerlach Resource Area has been reviewed and the following comments are submitted.

The people who prepared the draft are to be complimented on so clearly setting forth the problems resulting from domestic livestock overgrazing.

2-1 | The condition of the watersheds and the vegetation on the National Resource Lands clearly reflect the inability of the Bureau of Land Management to cope with the political influence of the local livestock industry and its extension in Washington, D.C. The stockmen sure as hell should be able to buy whatever influence they need since the Congress subsidizes them with the cheapest livestock feed in the nation. Perhaps this is the reason Nevada believes it can finance the "sagebrush rebellion". Who cares what happens to the nation's topsoil - perhaps it will last the stockman's lifetime. However, those who destroy it are as guilty of murdering future generations as those who perform abortions. Those who vandalized Rome were children compared to the vandalism performed by the domestic livestock graziers on the described lands.

2-2 | While Chapter 2, "Climate" mentions that average annual precipitation varies from 4 inches on valley floors to 20 inches in the mountains, there is no reference to annual solar and wind evaporation. These factors, together with precipitation, are significant influences in determining a "desert environment" and whether or not domestic livestock grazing should be allowed. Ignoring these factors indicates that the government-grazier-banker complex intends to use destruction of the National Resource Land watersheds as a means of "milking" the nation for their benefit. The "carrot" of cheap meat from the NRL is costing the nation more than it's worth.

Please advise what you intend to do about it. It is requested these comments and your reply be recorded in the final impact statement to be available in September 1981.

Yours truly,

Herbert Snyder, Secretary

Copies to interested parties

Response Letter 2

2-1 Issue: Watershed Protection

The importance of key watersheds and their needed protection have been recognized and steps are being taken to protect their critical value with an MFP recommendation for such. In addition, the importance of watersheds will also be addressed in CRMP (see Summary of FEIS).

2-2 Issue: Climate

Solar and wind evaporation are recognized as key factors influencing existence and growth of vegetation, however such data are lacking for this area.

Comment Letter 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

Project # D-BLM-K65046-NV

7 APR 1981

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

Dear Mr. Shields:

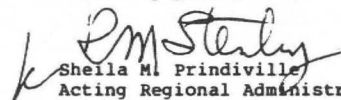
The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED DOMESTIC LIVESTOCK GRAZING MANAGEMENT PROGRAM FOR THE SONOMA-GERLACH RESOURCE AREA.

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 3

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 for which no mitigation is proposed (see conclusions, page 3-8). At a minimum, the Final Environmental Impact Statement (FEIS) should address the following issues:

- 3-1
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).
 - 3-2
 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 3

ETS CATEGORY CODES

Environmental Impact of the Action

IO—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 3

3-1 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 Final EIS). Impacts to water quality will be addressed on a case-by-case basis as allotment management plans are analyzed through the environmental assessment process.

3-2 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 4

May 5, 1981

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

Dear Mr. Shields:

This letter is the response of the Pershing County Sportsmen's Association to the EIS for the Sonoma-Gerlach Area. We are also in the process of sending letters to the congressmen and governor of the State, expressing our request that they support the overall plan as stated in the EIS. It is our hope, however, that the BLM consider making some additional refinements to help wildlife in the plan for the Sonoma-Gerlach Area along the lines of our suggestions that follow.

First, we feel that the continued degradation of the riparian habitat is unacceptable. It seems rather contradictory to profess planning a program to rehabilitate the public range lands as required by Congressional edict and then allow one of the most important and life-giving aspects like meadow areas to continue the decline. The sportsmen of this county have worked for years trying to preserve what few meadows we have left in Pershing County by erecting fences around key locations utilized by wildlife, specifically sage grouse, in hopes that some day the BLM would devise a program to obviate the need for our expense and labor. Now we find that the program of land protection we have awaited does not even give consideration to riparian habitat.

If we would have gotten some help from the BLM in restoring, protecting, fencing, and maintaining these riparian sites in the last ten years, we would not be so concerned. But, we have been able to beg only about two miles of meadow fence since we began making requests twenty years ago even though we have many sites in need of protection. We still await one meadow preservation fence that was planned in 1972 in the Cow Creek area.

All we ask, is that your proposal be modified to give some consideration to adjusting expenditures on fencing so that some funds are shifted from doubtful items like reseeding to riparian fencing. We have knowledge of where the fences are needed and would not only help the BLM to ascertain these sites, but we would also be responsible for maintenance on them. Obviously the fencing of the meadows would not be needed if the BLM can devise other means of protecting the meadows. But, after reading the EIS, I fail to see how it could under the proposed action.

Secondly, we feel the periods of use in the Seven Troughs, Blue Wing, Pleasant Valley, Majuba, Star Peak, Goldbank, White Horse, and Coal Canyon-Poker areas are slanted too much in favor of livestock and not enough in favor of the environment and wildlife. Based on our decades of study of the key plant species, rainfall patterns, plant growth under grazing and devoid of it, botanical studies, reports of how the land was and how it is, and opinions of BLM personnel personally escorted to study vegetation in our area, we feel that the rest period of March through May is just not enough, especially at the inception of the proposed action. The vegetation

Comment Letter 4

both non-riparian and riparian is in deplorable condition in the above named allotments. We don't feel the key plant species can regenerate with only those months' rest. Even the EIS writers and quoted sources feel that a grazing system that is more fall oriented and less spring oriented would be more desirable to our desert environment, especially if the next few years are dry as they are predicted to be by climatologists.

Most specifically, the Blue Wing allotment is in the most deplorable shape. Because of poor water distribution and excessive livestock, most key plant species are almost totally non-existent. This allotment is a perfect example of the desertification the West is undergoing as reported in U.S. News and World Reports due to improper land management.

We feel these allotments should be given at least the months of June and July, also, to rest. If they respond well enough, possibly an increased period of use could be allowed. But after decades of abuse, one wouldn't expect them to come out of desertification very rapidly.

Stream deterioration, like riparian, will continue to occur also. We would like to see fencing money referred to in Appendix C be diverted to stream preservation. We do not have enough streams that we can afford to lose the nineteen referred to in the EIS. Already, our several streams that do support fish are on the verge of extinction due to stream bank deterioration, gullying, and watershed destruction. Star Creek is now many feet below its original level. It seems to us that the EIS shows the BLM to be in violation of BLM Manual 6740 guidelines in planning to allow stream deterioration to continue. We consider all our streams "important" in that they are very few in number, provide much recreation, and are part of the visual resource management. It seems only proper that if the BLM cannot favorably affect the eight or nine privately owned streams, it could at least provide some protection for the nine it does have control over. According to the EIS, this can only be done by fencing.

Another major concern we have is the land treatments listed in Appendix D. We can see only a general listing of proposed treatments and cannot ascertain where these treatments would specifically occur. We would like the BLM to insure that no treatments be made in areas utilized by sage grouse, especially in Pershing County where the grouse population is extremely low and where grouse habitat is perilously rare. Our island grouse populations cannot stand even the slightest disturbance to habitat. We would hope that much research be done to identify any tracts where grouse do occur before any seeding takes place. The EIS seems to imply that this has not as yet been done. Upon the determination that a land tract does indeed have grouse or could be a site for potential grouse population expansion, we would hope that any treatment and seeding of that tract be suspended.

Also, we feel that the implementation schedule is rather late for the Seven Troughs and Blue Wing allotments. These areas are severely depleted, more so than other allotments scheduled earlier. We feel that implementation earlier than 1985 would be desirable.

Lastly, we hope that the overall longterm design of the proposed action for Sonoma-Gerlach be slanted more toward wildlife. We fail to see why the reasonable numbers of deer do not rise in relation to the increase in AUM's.

Comment Letter 4

Also, we don't see why sage grouse can only rise 30%. The only real gains wildlife will make are in antelope and bighorn sheep, assuming that bighorn are introduced in the magnitude suggested, which is unlikely. We would rather see more attention given to sage grouse and deer also.

Thank you for giving us this opportunity to comment on the EIS for Sonoma-Gerlach area. We sympathize with the BLM for trying to implement a program of this magnitude and change in this conservative and often times belligerent environment. We know the political climate is wrong, but we hope, along with you, to achieve at least some beneficial changes in hopes of preventing the ultimate desertification of the West. Should this political climate allow, we would hope that the BLM consider implementing a program that is more land oriented. We would like to see the riparian habitat, streams, aspen groves, soils, stream banks, fish, sage grouse, and other wildlife managed more for their specific benefit and not just as they fit into the livestock plan.

Sincerely yours,

Marlowe Jevning
Marlowe Jevning
Pershing County Sportsmen's Assoc.

Response Letter 4

4-1 Issue: Stream Deterioration

Because of the broad nature of the alternatives, including the proposed action, specific protective measures for particular streams could not be addressed. However, objectives for riparian habitat protection have been established and will be included in the land use plan (MFP). In addition, riparian habitat protection will be fully considered in management plans developed through CRMP.

4-2 Issue: Land Treatments

Land treatments will be analyzed in environmental assessments as specific sagebrush control projects are proposed. Treatments proposed in sage grouse use areas will be coordinated with the Nevada Department of Wildlife, and mitigating measures will be incorporated into project design prior to on-the-ground treatment. See Standard Operating Procedures 1 and 10 in the DEIS, pages 1-30 and 1-33 respectively.

4-3 Issue: Increasing Deer Numbers

See response to Issue 12-4.

Comment Letter 5



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

DES 81-15

MAY 6 1981

Memorandum

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

From: Acting Assistant Director for Resource Programs

Subject: Review of draft environmental statement for grazing
management program, Sonoma-Gerlach resource area, Nevada

We have reviewed the draft statement as requested in the State Director's notice.

5-1 The draft statement indicates that most streams disappear into the ground-water reservoir upon leaving the mountains (p. 6-13), and tables on pages 6-13 and 6-17 suggest the importance of ground water as a source of supply for the proposed management alternative. The statement should summarize the occurrence of ground water, giving at least types of principal aquifers, typical depths of wells, depths to water, well capacities, and any other pertinent information. General information on quality of ground water and any observed water-level trends would be helpful. If some of the wells mentioned in the tables are still to be drilled, this should be indicated.

5-2 The definition of aquifer (p. 6-91) should stipulate that an aquifer is capable of yielding useful or significant amounts of water. The definition of ground water (p. 6-92) should restrict ground water to that within the zone of saturation; otherwise soil moisture, vadose water, vapor-phase water, etc., would be included.

Eddie R. Wyatt
Eddie R. Wyatt

Response Letter 5

5-1 Issue: Groundwater Reservoir

As stated in the DEIS, impacts of the proposed action and the alternatives on the water resource were not considered significant. Consequently, detailed information as suggested is not incorporated into the draft.

5-2 Issue: Definition of Aquifer

While the suggestions for improvement of the definition are constructive and would probably result in a more complete understanding, it is felt that the existing definition is fully adequate to provide the average reader with a basic understanding of the terms.

Comment Letter 6

May 8, 1981

Frank Shields, District Manager
705 E 4th Street
Winnemucca, Nv 89445

Re: Environmental Impact Statement Sonoma-Gerlach

Dear Mr Shields:

The following letter is submitted as comment on the proposed Domestic Livestock Grazing Management Program E.I.S. for the Sonoma-Gerlach area of Northern Nevada. This document requires livestock operators to examine proposals, at least three out of five, of which extend from detrimental to catastrophic to our industry.

While the study concerns itself in great depth with superfluous impacts such as that of the "lizard population from reduced grazing (3-40) and "the visitor days spent viewing wild horses (3-111) nowhere does the study take into consideration the potential consequences of eliminating a local source of human food by reducing or eliminating domestic livestock.

This E.I.S. grazing document is radically biased against the livestock industry. The Bureau of Land Management has purportedly been managing the range since 1946 and has been decreasing livestock numbers, manipulating grazing criteria, and creating artificial barriers to animal movements to further reduce range use. In spite of all this management the report blames domestic livestock for all the ills set forth in this report.

As an example, range livestock appear to be blamed for sage grouse decline (2-21). A large flock of grouse has lived in or near our alfalfa field for years in spite of the fact that we cut three crops of hay, spray for aphids, and pasture cattle there six months out of the year. The birds strut, raise their young in the field and stay among the grazing cattle. The only event that reduced grouse numbers was when hunters came around the field, threw rocks at the grouse until they flew out, and then shot them. All but six were killed in one day. Hunter pressure, not grazing cattle is responsible for decline in game species.

6-1 Forage allocations in this study have been projected on the basis of range surveys 20 and 30 years old, and range trend projected on the professional judgement of field personnel. Before decisions are made, actual range surveys should be done over a protracted cycle of wet and dry years and the cumulative data used.

Comment Letter 6

Comment Letter 6

Suitability criteria, such as 50% slope, should be reexamined.

The report does not explain the benefit of attaining a climax vegetation community when no animals would be allowed to eat this vegetation after this condition was attained. By reducing grazing numbers so that grass is allowed to dry and remain on the ground through the summer, you are creating an extreme fire hazard. More range will be completely destroyed by fire than can be improved by leaving dead grass. Revegetation programs cause ground disturbances which encourage multiplication of burrowing rodents that destroy forage, cause erosion, and spread disease.

Wild horses and burros, are in actuality not wild animals at all, but the product of domestic stock released at the end of the turn-of-the-century mining era and the natural increase of domestic range stock which were confiscated by federal wild-horse legislation. They should be limited to one herd-management area per grazing district. This should be in an area entirely composed of federal land and where no single permittee would be losing all his grazing privilege. Buying or trading for private land by the federal government to create a horse refuge would put an unfair premium on the private land. Ideally the area should be purchased by the horse groups, and the expense of the animals borne entirely by them. The other alternative would be for horse protection groups to pay the same per head grazing fee as other users. The bias in favor of horse protection groups is evident in this report as they were contacted and their comments solicited (2-43). In all fairness, before a final draft is completed, comments from the American Farm Bureau, the National Cattlemens, Woolgrowers, and Cowbellees should be solicited and incorporated.

Reintroduction of big horn sheep would further complicate the allocation problem and should not be considered. Instead of livestock numbers being reduced to increase big game, hunter pressure should be reduced.

The report explores economic options (6-75) for ranchers whose livestock numbers will be severely reduced, but none of the suggestions to mitigate rancher hardships are realistic. Almost all ranches are land-locked with federal land and cannot expand. They are using and selling all of the forage produced and many have all their farm land in production and therefore no expansion alternative. Federal land suitable for farming should be sold into private use as compensation for lost grazing privileges or made available for Desert Land Entry. (No provision was made in this report for reductions in AUM's that will occur should the claims be perfected on DLE or Carey Act applications that have already been filed.)

In addition, ranchers should be compensated for loss of forage on private lands by wildlife. Ranchers gave up many of their range privileges voluntarily in the past in exchange for promises of specific improvements that were never implemented. These agreements should be re-considered and satisfied, and provisions should be made for the return of suspended non-use which ranchers have taken over the years.

6-3 | Periods of use should be made compatible with individual ranch operation not arbitrary objectives of an allotment plan.

In summary: the document is unwieldy and redundant. It is biased against livestock operators. It was written by persons who have inadequate ties to the community and insufficient local experience to make valid conclusions that would terminate the livestock industry. Too much professional opinion and field judgement was used in place of serious research projects. Inadequate and outdated information was used on range condition and trend. Frequent changes in personnel and policy have diminished the effectiveness of federal management of the public lands. We favor a return of the lands to the State of Nevada and that the lands suitable for farming be sold into private ownership. We favor maximizing livestock use in the Sonoma-Gerlach area or a policy of no action until the lands can be turned back to the State of Nevada.

Sincerely,

Tony Tipton

Ruth Tipton

for TIPTON RANCHES
Pumpnickel Valley

cc's to numerous Federal officials
and interested organizations

6-2

15

Response Letter 6

6-1 Issue: Range Survey

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

6-2 Issue: Public Contact

As outlined in National Environmental Policy Act (NEPA), one of the first steps in preparing an EIS is to hold scoping meetings at which time the alternatives including the proposed action and all other pertinent information are presented to the public. All interested persons were encouraged to respond. Every attempt was made to incorporate this public input into the DEIS whenever applicable. It is the intent of the Bureau to send copies of the DEIS to all interested groups and individuals, such as the Nevada Cattlemen's Association, and the Nevada Woolgrowers Association. News releases were issued to inform the public of the availability of the document and that copies would be sent to anyone who requested such.

6-3 Issue: Periods-of-Use

The proposed periods-of-use (Appendix B, 6-9) were established based upon the critical growth periods of key management species for each individual allotment. The critical growth periods of key management species were determined through evaluation of the statewide phenological studies conducted by Natural Resource Consultants (NRC) in cooperation with the Nevada Bureau of Land Management. See DEIS, Chapter 2, Phenology section (page 2-5). Periods-of-use would be established through negotiation and agreement until such time as an intensive grazing management plan has been implemented. However, in the absence of an agreement, periods-of-use would be implemented in conjunction with the CRMP and monitoring process. Upon development of an intensive grazing management system, through agreement and/or the CRMP process, periods-of-use would be tailored to each individual allotment and ranching operation, based upon the critical growth periods of key management species. See discussion of CRMP and monitoring in the Summary in the Final EIS.

Comment Letter 7



C-PUNCH CORPORATION

LOS ANGELES
1130 S. FLOWER ST.
LOS ANGELES, CALIF. 90015
213 747-5684

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██████████
██████████
██████████

May 13, 1981

Mr. E. F. Spang
State Director, Nevada
Bureau of Land Management
P.O. Box 12000
Reno, NV 89520

Re: 1792 NR09 N-020
Sonoma-Gerlach Grazing Environmental
Impact Statement

Dear Sir:

The following are comments by C-Punch Corporation to the Proposed Management Grazing Program (Sonoma-Gerlach Resource Area, Nevada).

C-Punch Corporation wishes to direct its comments regarding the proposed EIS Draft to the Blue Wing and Seven Troughs Allotments.

The first reaction to the Draft is disappointment that so much effort and so much expense has been put into a report which does not offer a valid framework upon which to base future cooperative use agreements between the BLM and the livestock permittee.

The EIS Draft describes and analyzes four proposed alternatives, to wit: (1) No livestock grazing, (2) No action, (3) Maximizing livestock, and (4) Maximizing wild horses and burros. Without being facetious, C-Punch would like to offer a fifth choice, namely, (5) None of the above for the following reasons:

A. THE EIS DRAFT FAILS TO CONSIDER EXISTING CONDITIONS.

C-Punch feels that the assumptions and conclusions presented in the EIS Draft are not current, are not based on supportable facts, and fail to recognize trends and changes in weather patterns and vegetation which have occurred over the past thirty years which are probably irreversible and which cannot be changed by the proposed programs.

For example, Vegetation Production (page 2-7) is estimated as being based on two ocular surveys in 1947 and 1960. No rain fall figures are offered for base year comparison. No usage figures in the base years are offered for comparison.

The report states (page 2-7), "Vegetation Production was estimated by using the 1979 recompilation of 1947 and 1960 ocular reconnaissance range surveys in accordance with BLM Manual 4412.11A."

Comment Letter 7

Mr. E. F. Spange
State Director, Nevada
Bureau of Land Management

Page 2

May 13, 1981

7-1 Apparently, not even an ocular recognaisance was made in 1979 or some of the changes in the area would have been noted. Namely, because of changes in the climate, soil conditions, or other reasons, the principal ground cover in most upper elevation areas of the Blue Wing and Seven Troughs Units is now cheet grass. This vgrass is most beneficial in preventing erosion and is consumed in large quantities by wild horses and livestock and exists in areas which have been grazed as well as in ungrazed areas. For example, the Ragged Top area hasn't been grazed in over twenty years, yet cheet grass is the predominant ground cover on the east side of the mountain. There is certainly no reason to believe the programs outlined in the Draft would result in the re-establishment of more desirable grass species as suggested. Further, it is not shown that a return to less hardy grass species is desirable if it could be accomplished.

In the Blue Wing Unit, 1979 usage is estimated at 43,645 AUM's (Appendix A, page 6-6). According to the EIS survey based on 1947 and 1960 forage estimates which are reduced by the BLM suitability requirements, only 19,816 AUM's are said to be available.

7-2 The Draft states there is therefore 23,829 AUM's of overuse, or 120% overuse. Since no range could survive long with 120% overuse and since a 500% increase in wild horses and burros has occurred since 1971 in the Blue Wing and Seven Troughs Units, why can't the EIS Draft deal with the facts as they now exist instead of harking back to some Camelot in 1947 or 1960 which is no longer material to the present situation?

7-3 While we are discussing changes over the last thirty years, why doesn't the EIS Draft mention the most popular game bird in the area - the chucker? The Blue Wing and Seven Troughs Units offer the finest chucker habitat in the State of Nevada and provides more recreation hours of hunting than all other species put together. I can only speculate this omission was intentional because the chucker is not a native bird. Crested wheat grass and wild horses are not native either. Also, both the wild horse and the chucker depend on, for the most part, the unmentioned cheet grass for their livelihood. The omission of the obvious in the Draft makes it totally unacceptable.

B. SUITABILITY REQUIREMENTS ARE UNREALISTIC.

Appendix A, Section 1, outlines Vegetation Initial Allocation Procedures as follows:

- 1. No vegetation on slopes greater than 50% was allocated to livestock or wild horses.
- 2. No vegetation was allocated to livestock or wild horses in areas that produced less than 25 pounds of forage per acre.

Comment Letter 7

Mr. E. F. Spange
State Director, Nevada
Bureau of Land Management

Page 3

May 13, 1981

- 3. No vegetation greater than four miles from dependable water source was allocated to livestock or horses."

It is submitted none of the foregoing requirements are realistic:

7-4 (a) Even if it were desirable for cattle and horses not to graze on slopes greater than 50%, how does one enforce this criteria? If the grass is thickest on the steep slopes, they will be used.

7-5 (b) Since the most prolific grass (cheet grass) was not even considred, how can one determine from a 20 year old survey what areas produce 25 pounds per acre? Also, the same reasoning applies as to the slope - how can one control where the livestock and horses graze?

(c) The water limitations may have some validity, however, most desert cattle will go more than four miles for water.

7-6 The maps in the EIS Draft showing water locations are not accurate with respect to the Blue Wing and Seven Troughs Units. Many major springs are not shown and some shown no longer exist. Also, many areas contain water during spring and summer rain periods and are heavily grazed when water is available. Such areas should not be excluded. Also, C-Punch hauls water to certain areas to utilize forage and scatter its cattle.

On page 1-2 of the Draft, it is stated:

"4. BLM's intent is to incorporate prior to implementation, any reliable new data and information which may become available from BLM, land users and the general public."

7-7 C-Punch will be happy to assist the BLM in updating its water maps. We also suggest that actual trends and utilization statistics be substituted for the artificial suitability tests which have been incorporated into the EIS Draft.

Actually, no vegetation estimate is feasible for the Blue Wing and Seven Troughs Units until excess wild horses and burros are removed. At the present time, the BLM is under a Court Order to remove excess horses and burros from the permittees private land by October of 1981. In addition, a wild horse drive is planned for the Lava Beds area in early summer.

Land use planning must be based on the control of both horses and livestock. At the present time, livestock production is removed twice a year. Horses have been reproducing for ten years and none have been removed.

Mr. E. F. Spange
State Director, Nevada
Bureau of Land Management

Page 4
May 13, 1981

C. ENVIRONMENTAL AND ECONOMIC CONSEQUENCES OF IMPLEMENTATION OF THE PROPOSED ALTERNATIVES.

Economic forecasts are generally not very accurate and the same is probably true for environmental forecasts. One prediction in the EIS Draft that is accurate is that the large ranches who operate on a twelve month permit will be unable to function economically under the alternatives offered in the EIS, particularly the requirement that livestock be removed for March, April and May.

Because of the following reasons, it is not feasible for C-Punch to remove cattle for certain periods (i.e., March, April and May):

1. Any cow taken off the range must be sold because it is not economical to feed her and put her back. The cost of feed and transportation during the removal period would exceed the value of the calf.
2. Because of weather conditions, it is impossible to round up cattle in January and February.
3. January, February and March are heavy calving periods and it is unwise to try to round up calving cows. (Note: The horse people objected to roundups during foaling, aren't cattle entitled to the same consideration?)
4. At the present time, C-Punch has no place to hold the cattle for three months, nothing to feed them and does not have the manpower and equipment to move them.

Along with the prediction that large ranches cannot operate under the proposed alternatives, to which we agree, it is also predictable that the BLM, which employs as many people as the large ranches, will also become extinct since there will be no need for their expertise in administering the Taylor Grazing laws.

D. "NONE OF THE ABOVE", the alternative suggested by C-Punch.

C-Punch believes that it is possible to develop a management plan which will achieve the goals of the EIS Draft Proposal without destroying the ranchers and the BLM.

We recommend the following:

1. Most important is reduction of wild horse and burro herds to 1971 levels and providing continuing programs for removing excess horses annually as cattle and sheep are removed annually.

2. Under the proposals in Appendix C for livestock support facilities, to wit:

	Fence		Wells	Pipelines		
	Miles	Cattlequards		Miles	Troughs	Springs
Blue Wing	94	3	17	3	38	1
Sev. Troughs	37	2	3	2	8	1

Mr. E. F. Spange
State Director, Nevada
Bureau of Land Management

Page 5
May 13, 1981

There is no doubt that with the proposed range improvements, the present carrying capacity of the range would be improved and livestock grazing of certain areas during critical growing periods could be eliminated for the most part. Fortunately, the area is so large and elevations vary enough that growing periods are different throughout the range.

The most critical areas for fencing are the outside perimeters; (1) along Highway 34 from Lake Winnemucca to Empire, (2) the Southern Boundary between C-Punch and Ceresola, (3) fence off the winter range areas to hold more cattle through April and May, also to keep cattle off the winter ranges till late fall. Most of the winter ranges depend on late spring and summer rainfall.

The map of proposed Land Treatments and Facilities in the EIS proposes to fence off many canyons and washes to create small fields for rest rotation usage.

We doubt very much that fencing the areas shown would achieve the desired results and believe the money could be spent better in creating larger fields and additional water development.

We believe that once the key perimeters are fenced, grazing can be controlled by fencing off the water. Key springs and watering areas could be fenced off during periods when grazing was not desirable and the cattle moved to areas where the water is made available. This way, both horses and cattle can be managed and fencing costs cut to a minimum.

Deer and other wildlife should not be bothered by the fenced water holes.

With water control and perimeter fencing, there is no reason the Blue Wing and Seven Troughs areas couldn't continue to support livestock in present numbers and horses at 1971 levels within a very short time. Certainly, long before the year 2024.

If the foregoing proposal meets with BLM approval, we would be very pleased to assist in the planning process.

Sincerely,

C-PUNCH CORPORATION

Robert G. Irvin
ROBERT G. IRVIN
President

RGI:ljp

District Manager,
Winnemucca District

Response Letter 7

7-1 Issue: Conversion of Vegetation Communities to Cheatgrass Understories

The situation expressed concerning the conversion of perennial grass understories (desirable to livestock) to annual grass understories (undesirable to livestock) in the Sonoma-Gerlach Resource Area was addressed in the DEIS. Refer to Chapter 2, Vegetation Communities section (page 2-2). This aforementioned process is known as retrogression of climax bunchgrass plant communities. Furthermore, the continuation of livestock grazing can hold vegetation communities in a stage of disclimax preventing movement towards climax plant communities (succession), without change in the livestock grazing practices. In addition, the DEIS Chapter 3, Ecological Range Condition and Trend of Vegetation Communities section (page 3-8) expresses the apparent inability of some vegetation communities to improve, due to low site potential and/or low vigor condition. A successional change towards perennial bunchgrass species would be beneficial by providing a sustained yield production for all grazing uses and providing the best means of checking surface soil loss and rebuilding depleted soils. Perennial production is not as variable as annual production due to annual climatic differences.

7-2 Issue: Range Survey

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

7-3 Issue: Chukar

See response to Issue 12-7.

7-4 Issue: Range Suitability Criteria

The range suitability criteria and standards used in the Sonoma-Gerlach EIS were developed by BLM's range staff. These procedures have been field-tested in several BLM districts and reviewed by range scientists from universities and other land managing agencies. Evaluation has indicated the procedure to be a sound method of determining rangeland suitability for domestic livestock grazing.

Rangeland was determined to be suitable for livestock grazing if it could produce forage on a sustained-yield basis without damaging the soil and vegetation resources. Suitable range should not be confused with usable range. Many areas can be grazed by livestock and are therefore usable, but these areas may not be suitable for grazing on a long-term basis because of the resulting damage to the area or adjacent areas.

A value (25 pounds of usable forage per acre) or 32 acres per AUM is considered the maximum number of acres per AUM to be suitable for domestic livestock grazing. Allocation of vegetation from rangelands with less production would result in abuse of adjacent

Response Letter 7

more productive areas and result in a lack of sufficient forage for livestock maintenance and growth. The literature reviewed on this subject includes Stoddart and Smith (1944), Johnston-Wallace and Kennedy (1944), Wallace and Foster (1975) and U.S. Forest Service, Forest Service Handbook (1964).

Steepness of Slope

Research information shows that as the steepness of the slope increases there is less utilization of the forage. Steeper slopes (greater than 50 percent) are seldom utilized. When they are used it is only after damage to resources on adjacent, more gentle slopes has taken place. The literature substantiating this conclusion includes Stoddard, et al. (1975), Cook (1966) and Phillips (1965).

Distance from Water

Four miles from water is the maximum, even on level land, that cows will go to grass and still maintain satisfactory use of the vegetation. The distance from water would be much less in mountainous terrain (generally one mile or less). The literature reviewed on this subject includes the Arizona Interagency Range Committee (1972), and Stoddart, et al. (1975).

Concept of Range Suitability

Suitability classification of rangelands for livestock grazing is the consideration of the capability of forage-producing land to be grazed on a sustained yield basis, under an attainable management system, and without damage to the basic resources of the area or to adjacent areas. Suitable range should not be confused with "usable" range. Many areas can be grazed by livestock and are therefore usable, but may not be suitable for grazing on a long-term basis because of the resulting damage to the area or adjacent areas. The classification of a particular rangeland area as unsuitable does not necessarily mean that area will not receive livestock use, but rather than the available forage on the unsuitable area should not be allocated to livestock use. Therefore, the application of the suitability criteria does not mean actually restricting livestock use on these areas.

While these criteria are realistic and based upon sound principles of range management, the reason for application may not exist in all areas. Therefore, the application of the suitability criteria would be field verified through the CRMP and monitoring process prior to any adjustments in livestock use.

7-5 Issue: Range Facilities Map

Due to the scale of the maps, it is difficult to legibly show every detail on the map. Maps of larger scale and more detail are available at the district office.

7-6 Issue: Range Monitoring

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

7-7 Issue: Intensive Allotment Management Through Development of Livestock Support Facilities

The proposed livestock support facilities were an estimation to provide a base for analysis purposes (see DEIS Chapter 1, Livestock Support Facilities section, page 1-9). Through the coordinated planning effort (see the CRMP section in the Final EIS summary) the development of allotment management plans and associated livestock support facilities to implement these plans will be coordinated with all interest groups. This would assure the tailoring of allotment management plans to individual allotments and ranching operations to best satisfy the desired management objectives. See DEIS Chapter 1, Grazing Systems section (page 1-8) and Chapter 3, Ecological Range Condition and Trend of Vegetation Communities section (page 3-9) for a more detailed discussion of coordinated development and tailoring of allotment management plans.



Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774

DANIEL A. POOLE
President
L. R. IAHN
Vice-President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

May 19, 1981

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

Dear Mr. Shields:

The Wildlife Management Institute is pleased to comment on DRAFT SONOMA-GERLACK GRAZING ENVIRONMENTAL IMPACT STATEMENT.

A major change is needed to make the proposed action acceptable for wildlife. The primary problem rests with the 2,000 acres or 142 miles of riparian areas (p. 2-5 and 2 19). The data presented on 3-14, 3-15, 3-17 and 3-41 indicate a small decline in riparian system condition is contemplated. The data on relation between grazing systems and riparian condition are good. There is no way that the shrubs will improve. No mitigation is proposed. Until substantial effort is made to improve the riparian areas we must object to the proposed action.

Some specific comments follow.

- 8-1 | P. 1-2. How valid are the 1947 and 1960 range surveys "recompiled" in today's planning?
- 8-2 | P. 1-33. Add a section on the size of seedings.
- 8-3 | P. 2-16. Mule deer. We do not know what caused population declines. How can you be sure what is now causing the increase? An explanation is needed of 3,929 deer on 3,550 allotted A.U.M.
- 8-4 | P. 3-3. We do not understand the "riparian threshold." Riparian systems must be related to terrestrial wildlife as well as aquatic.

P. 3-15. Table 3-5 should explain that grazing systems will not of themselves increase trees and shrubs in a riparian area.
- 8-5 | P. 3-23. Unavoidable adverse impacts. No riparian degradation is "non-significant," at least to wildlife.
- 8-6 | P. 3-38. Add a discussion of Bighorn-domestic sheep problems.

20

Comment Letter 8

Mr. Frank Shields

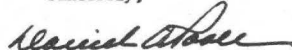
-2-

May 19, 1981

A special section on mitigation is needed.

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

Sincerely,



Daniel A. Poole
President

DAP:lbb

Response Letter 8

8-1 Issue: Range Survey

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

8-2 Issue: Size of Seedings

The establishment of a minimum or maximum size for a rangeland seeding in the Standard Operating Procedures would be an arbitrary estimate only. However, through the CRMP (see the CRMP section in the FEIS summary) process each rangeland seeding would be evaluated on a case-by-case basis for the size, species planted and configuration of the seeding. Thus, all characteristics of a rangeland seeding would be dependent on the established multiple use management objectives for each allotment which would benefit proper rangeland management.

8-3 Issue: Increase in Deer Population

It is not well understood exactly what factors were responsible for the recent increases in the mule deer population. It is likely a combination of factors. Improved harvest management (implementation of a harvest quota system) has no doubt contributed considerably to this increase. Mild winters the past few years have enabled deer to remain on their more productive summer ranges (higher elevations) for longer periods. This contributes to increased health and productivity for these animals. Higher fawn survival also may result during milder winters. See analysis, DEIS Mule Deer section, page 2-16, first paragraph.

Some species of vegetation, e.g., sagebrush, are utilized by deer but are seldom used by domestic livestock. This has provided some additional forage over that initially allocated to deer. In some cases, deer may forage on less desirable vegetation, i.e., less palatable species or second year's growth (coarser twigs on brush species). The overobligation of available vegetation that has occurred does, however, exemplify the major cause of less desirable habitat conditions.

8-4 Issue: Riparian Threshold

The aquatic habitat section deals only with the condition of the riparian vegetation and stream features in relation to the stream's ability to support a sport fishery. The relationship between the riparian zone and terrestrial wildlife is dealt with in the Wildlife Section of the DEIS.

8-5 Issue: Riparian Degradation

The non-significant determination for the degradation of riparian vegetation was based on the vegetation thresholds of significance stated on page 3-2 of the DEIS. As discussed on page 3-16 of the DEIS the probability of the worst case analysis for riparian vegetation actually occurring is estimated to be less than five percent. This estimation of occurrence was determined, considering the Management Framework Plan II (MFP II) recommendation for riparian areas in the proposed action. As stated in DEIS Chapter 1, Grazing Systems section (page 1-8), if objectives for riparian habitat cannot be accomplished through intensive grazing systems, Allotment Management Plans (AMPs), then these riparian areas would be fenced to provide necessary habitat improvement. Thus, based on this MFP II recommendation, riparian habitat objectives would be accomplished depending on the success and/or failure of activity plans to provide for the resource objectives established for riparian vegetation. However, based on individual allotment management decision trade-offs among the resources, riparian vegetation will be as analyzed in the DEIS.

8-6 Issue: Bighorn - Domestic Sheep Problem

Currently, domestic sheep and bighorn sheep do not share the same ranges, but domestic sheep use is authorized in some areas containing potential bighorn habitat. If bighorn sheep introductions are programmed to take place in areas where domestic sheep use is authorized, or if a change in class of livestock from cattle to sheep is proposed where bighorn sheep occur, a site-specific environmental assessment will be prepared. This would include an analysis of bighorn-domestic sheep problems.

Comments on (Draft) Sonoma-Gerlach Grazing
Environmental Impact Statement

(1)

ALLOT.	TABLE 1-1			
	AUMs AUTH NOW	AUMs THREE YR AU USED	AUMs ALLOWED IN 1982	PERIOD OF USE
Desert Queen	3035	2834	730	7-2 to 2-28
Rodeo Creek	6631	6014	5184	6-1 to 2-28

Cannot figure why such a reduction in Desert Queen in 1980 the range looked better than it did 20 years ago or 35 years ago.

9-1 | Do not agree with reduction in Rodeo Creek. Season of use - have used year around since 1910 and range is in comparable condition. Why the big change?

(2)
9-2 | Shows Rodeo Creek has 1092 AUMs reserved for wild horses. Subtract AUMs for wild horses also for slope. The wild horses spend most of their time in the high steep country - this is subtracting AUMs twice. Removing surplus horses is food.

(3)
9-3 | Page 2-1 Says data incomplete - how can make decisions that a stockmans future is at stake based on incomplete information?

(4)
9-4 | Page 2-11 State .07 upward trend .25 stable .68 downward trend. Repeat comment on (1) range looks better and we have higher weaning weights.

(5)
Page 3-8 Says very little response in desert salt shrub after 32 years of protection. Just one good wet year and it responds.

(6)
9-5 | Page 3-8 No grazing March and April. Would be glad to work out rotation plan whereby use could be made year around. This would mean Gerlach Highway (east boundary) would be fenced.

(7)
3-55 States average net income per ranch would decline \$15,000 per year. Why have the program if it is going to break the rancher.

Comment Letter 9

9-6

(8)
Page 6-1 No vegetation allocation on 50%. Slope or greater the best feed is in the high steep country. Its where the wild horses spend most of their time in the summer.

No vegetation allocation on 32 acres/AUM.

I have seen quite a few cattle on areas that are mapped out 32 acres or greater, what are they eating.

No vegetation allocation 4 miles or more from water.

I have heard many good ranchers say their cattle will range up to ten miles from water especially after storms (snow) they will drink out of puddles and when they dry up, go back to water.

One of the statements Wild Horse Annie used before congress getting the wild horse bill passed was "The wild ones are forced to travel many miles to water" (Subtracting AUMs twice again).

Respectfully submitted,



Bill Ceresola

Response Letter 9

9-1 Issue: Range Survey and Season-of-Use

See discussion on CRMP at the beginning of the Summary section in the Final EIS. Also, see response to Issue 6-3 in the Final EIS.

9-2 Issue: Allocation to Wild Horses

The proposed allocation of vegetation to optimum numbers of wild horses in their use areas, as defined in the proposed action, is based on the Area Manager's recommendations in Step II of the Sonoma-Gerlach Management Framework Plan (MFP). Wild horse use areas and population numbers were determined through inventories and from public input prior to and during the MFP process. Only suitable vegetation was allocated to wild horses because the animals tend to graze on steep slopes when the vegetation in more accessible areas is overgrazed. The proposed allocation of vegetation to wild horses will be verified through CRMP and monitoring. Also, see response to Issue 7-4 in the Final EIS.

9-3 Issue: Incomplete Data

The paragraph referred to merely states the current situation concerning completeness of existing soils and range site information. Due to their incomplete nature, the data was not used in making recommendations on future management actions.

9-4 Issue: Rangeland Trend

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

9-5 Issue: Period-of-Use and Allotment Management Plans

See response to Issue 9-1 in the Final EIS.

9-6 Issue: Range Suitability Criteria

See response to Issue 7-4 in the Final EIS.

May 20, 1981
 Lerley, Nev. 89418

Bureau of Land Management
 Winnemucca, District
 705 E. 4th St.
 Winnemucca, Nev. 89418

Dear Mr. Shields:

I would like to make a few comments on the Sonoma Gravel Draft EIS Study that has been completed.

I cannot understand how a viable livestock operation can be maintained when livestock have to be removed from the range during the critical growing period.

Many operators have no place in which to keep their livestock during this period, which will force them out of business.

I believe there are other alternatives to obtain proper management.

First I would like to see several trend plots established in each allotment, study these for 5 years or more if needed, then make reductions or increases in A.U.M.'s if necessary.

To make drastic cuts as proposed without any trend studies is a step in the wrong direction.

Possibly deferred grazing systems could be implemented to ease the pressure of the critical growing period. In some cases a rest rotation system would provide the necessary objectives.

Some BLM personnel think overgrazing has eliminated some species of forbs & grasses on the flats and foothills. We must realize these plants grow on certain elevations and certain soil types and require certain amounts of moisture. Thus you can't have mountain top grass and forbs on the lower country.

I also think has a private range consulting firm done the E.I.S. with range experts and expertise we would have seen a much different end result, as I believe the personnel that prepared the E.I.S. lacked expertise and knowledge in range management.

Finally I would like to say carefully analyze all alternatives before any drastic reductions are implemented as this affects the livelihood of many people and the economy of the area as a whole.

Thank you

Yours Truly
 Star Sheep Co
 Robert Beffume

24

10-1

10-2

10-3

Response Letter 10

10-1 Issue: Trend Plot Establishment

See discussion on CRMP and Monitoring in the Summary Section in the Final EIS.

10-2 Issue: Use of Private Consultant Firm to Prepare EIS

The EIS is based on the recommendations put forth in the Bureau's Planning System - Management Framework Plan - Step II. In the case of the DEIS, the Proposed Action is a direct range recommendation, put forth by the Area Manager. To arrive at these recommendations the Area Manager relies heavily on his staff for their expertise, be it range, wildlife, or whatever, as well as any and all public input received.

10-3 Issue: Reduction

See response to Issue 10-1 in the Final EIS.

Comment Letter 11

INTERNATIONAL SOCIETY
FOR THE
PROTECTION OF MUSTANGS & BURROS

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

EXECUTIVE COMMITTEE OF THE BOARD OF DIRECTORS:

Helen A. Reilly, President
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Chuck John, Vice President
Betty Kuphaldt, Secretary
John W. Reilly, Treasurer
Alan Kanis, Public Relations



May 20, 1981

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

Dear Mr. Shields:

We thank you for letting us comment on the Draft Sonoma-Gerlach Grazing Environmental Impact Statement.

The grazing EIS addressed the environmental impacts of alternative levels of livestock use, systems for managing livestock use to accomplish specific management objectives, and the supporting range development projects. Not surprisingly, these analyses have indicated the need to reduce livestock use in some areas.

Domestic livestock operations are being carried out on land that does not belong to them, only by permit are they using it, and the extent of the use should in some way be more carefully regulated in the public interest. Abuses have been allowed to continue, particularly numbers of cattle far in excess of that for which a permit is issued. Livestock grazing on the public lands is a privilege, and not a right!

The Bureau's objective is to improve the productivity of the public rangelands for the benefit of all users. The Bureau should carefully examine opportunities to phase in reductions gradually and intensively monitor the results to determine more precisely how the individual range ecosystem responds to reductions and investment. In order to accomplish that task most effectively and rapidly, the cooperation of livestock operators is essential.

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. Wild horses and burros, in viable herds, should be retained throughout the district.

The law request BLM to remove horses and burros that stray onto private lands when they are requested to do so by private landowners. The horses in trespass on private lands should be removed for their safety and welfare.

11-1 | We recommend to bring to a halt licensing of domestic horses or burros on allotments which contain wild horses or burros.

Comment Letter 11

Sonoma-Geirach EIS
Page two

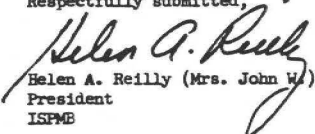
The ability of the Bureau to carry out the Proposed Action is questionable. Since there are many competing demands within the Bureau and the Department of the Interior it is unlikely many of the District's projects would be fully or adequately funded. Given the Bureau's and Interior's funding procedures and policy it is doubtful all projects, developments, etc. would be weighed equally. Whatever adjustments are made will correspondingly affect the Proposed Action. The likely result would be the omission of projects that benefit uses other than the traditional and dominant livestock use. This coupled with current hiring and staffing policies casts doubt on the implementation of the Proposed Action. There is also the reluctance of Congress to appropriate sufficient funding to achieve the proposal. Another obstacle is the Senators supporting livestock interest have imposed a limit on the reduction of livestock grazing to no more than 10%. Anything over 10% is voluntary and that action is the exception rather than the rule!

In reviewing the economics ... the only value figures used are those related to reductions in numbers of livestock and consequent economic impacts. No account is made of the potential economic gains provided by all resources that would be manifested through increased range improvement. If the resource is to be saved then all considerations should be dealt with fairly. I do not believe that every solitary animal on the national resource land should be considered for its economic value, aesthetic values of the public land, must also be considered.

11-2 In closing, I would suggest BIM seriously consider using Coordinated Resource Management Planning (CRMP) in all future efforts to regulate public rangelands. All users and special interest groups (wild horses and burros, wildlife, conservationist), working together, will accomplish the most good in the shortest amount of time.

We thank you for letting us express our views.

Respectfully submitted,


Helen A. Reilly (Mrs. John W.)
President
ISPME

Response Letter 11

11-1 Issue: Licensing of Domestic Horses and Burros

Present Bureau policy is not to license any domestic horses or burros in wild horse and burro use areas, which is the case in the Sonoma-Geirach Resource Area.

11-2 Issue: Using Coordinated Resource Management and Planning (CRMP)

See discussion on CRMP and Monitoring in the Summary Section in the Final EIS.

Comment Letter 12



STATE OF NEVADA
GOVERNOR'S OFFICE OF PLANNING COORDINATION
4F TOL COMPLEX
CARSON CITY, NEVADA 89710
(702) 885-4865

May 19, 1981

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

RE: SAI NV# 81300038 Project: Sonoma Gerlach EIS

Dear Mr. Spang:

Attached are the comments from the following affected State Agencies:
Divisions of Historic Preservation and Archeology, Environmental Protection,
Forestry, Water Resources, State Parks, and the Department of 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
Enclosure

Comment Letter 12

STATE CLEARINGHOUSE COMMENTS on SAI NV # 81300038
Project: Sonoma Gerlach DEIS

Division of Forestry

The Sonoma Gerlach EIS analyzes several alternatives for grazing management throughout the district. In reviewing the EIS I could find no proposed or ongoing management that would conflict with NDF programs or policy.

The district has very little pinyon and juniper forests. Ongoing and potential management would not conflict with any pinyon-juniper multiple use utilization programs of the future.

Division of Conservation Districts

The Sonoma-Gerlach Draft Grazing EIS, like the Paradise-Denio DEIS also reviewed recently, is a much improved document over earlier EIS's. It acknowledges the limitations of the range survey data and commits the BLM to a program of developing better data, including the completion of the soils inventories and the institution of a program of range condition and trend monitoring. It also acknowledges that the range suitability criteria, to which this agency has long objected, may not be applicable in all areas, but will be used with flexibility. Finally, it commits the BLM to active support of the use of coordinated resource management and planning (CRMP) to implement all decisions: the statement that "...the concepts of CRMP would be applied in all cases prior to initiating use adjustments and developing AMPs..." is the strongest I have seen in any grazing EIS. In summary, this document meets this agency's objections to past EIS's. While we do not necessarily agree with the specific forage allocations suggested in the DEIS, we do feel that the DEIS outlines a reasonable program, with which we will be pleased to cooperate.

Division of Water Resources

Pages 3-77 of the draft Sonoma-Gerlach grazing environmental impact statement indicates 39.5 acre-feet of water would be consumed annually by wild horses and big game.

12-1 } Any diversion of the public water to a beneficial use must comply with the provisions of Chapters 533 and 534 of the Nevada Revised Statutes.

Division of Environmental Protection

The project is located in a designated attainment area for ambient air quality standards. The dust standing may be violated during adverse meteorological conditions such as high winds. Proper management could be beneficial by maintaining adequate ground cover and reduced erosions.

Division of Historic Preservation and Archeology

See attached comments.

Department of Wildlife

See attached comments.

Division of State Parks

See attached comments.

27



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

May 1, 1981

MEMORANDUM

TO: Office of the State Planning Coordinator
 FROM: Division of Historic Preservation & Archeology
 SUBJECT: Comments on Clearinghouse Project Summary SAI NV #81300038 -
 Sonoma-Gerlach Grazing EIS

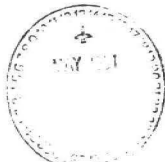
Upon reviewing the Sonoma-Gerlach Grazing Environmental Impact Statement, it has been determined that the report is not in compliance with applicable Federal statutes and regulations for the protection and preservation of the cultural environment.

12-2 Given the insufficient cultural resource data base for the proposed project area (less than one percent survey at the Class III level), generalizations concerning the frequency, location and type of cultural properties contained within the area must be considered highly speculative.

The final environmental statement must include evidence of compliance with the stipulations of the Programmatic Memorandum of Agreement which was executed between the National Conference of State Historic Preservation Officers, the Bureau of Land Management and the Advisory Council on Historic Preservation, and which was ratified on January 14, 1980.

Should you have any questions or require further assistance, please do not hesitate to contact this office.

WDS:vh



Recycling
 Nevada's Heritage



DIVISION
 OF
 STATE
 PARKS

MEMO

TO Roland Westergard
 FROM John L. Meder
 SUBJECT DRAFT SONOMA-GERLACH GRAZING EIS DATE APR 30 1981
 SAI NV # 81300038

The Division of State Parks appreciates the opportunity to comment on the Draft Sonoma-Gerlach Grazing Environmental Impact Statement.

We generally concur with the BLM Proposed Action for the Sonoma-Gerlach Resource Area. While short term impacts will not substantially alter the present conditions of the area in regard to recreation, it appears the long term impacts will be beneficial. Increased vegetation cover would be beneficial from an aesthetic point of view as well as increasing wildlife production for future game hunting.

However, we are concerned with the general effects of the proposed action on aquatic habitat. Most other impacted resources eventually show improved conditions under the proposed action. The DEIS states "The proposed grazing systems would have no beneficial effect on cold water fish in the resource area streams". The 1977 State Comprehensive Outdoor Recreation Plan identified stream fishing as a favorite activity of Nevada residents in five of the six Outdoor Recreation Planning Regions. In-as-much-as BLM lands are "public" lands to be used under the multiple use concept, we would like to see more consideration given to recreationists and their desire for quality fishing locations. Further research and cost analysis should be conducted on stream areas to determine the feasibility and benefits of fencing. Private landowners along these streams could possibly be encouraged to sign cooperative agreements to protect stream areas. Should a private landowner refuse to protect stream habitat on his own property, grazing allotments on "public" property could be withheld.

12-3 Should BLM change their methods of allocating vegetation based on Animal Unit Months (AUM's), as they have in the Caliente Management Area, the Division of State Parks would like to be notified, and eventually included, in the five (5) year monitoring program. Dispersed recreation on public lands is an integral part of the Nevada lifestyle. As such, recreation suppliers and planners should be included in the decision making process where impacts upon recreation are possible.

JLM:tlis



Comment Letter 12

Mr. Mike Nolan
May 18, 1981
Page 3

- a. The map entitled "Proposed Land Treatments..." shows a proposed seeding at approximately T35N, R22E, Sections 4, 5, 7 and 8, and T36N, R22E, Sections 20, 21, 22, 23, 27, 28, 29, 30, 31, 32, 33 and 34 in the Buffalo Hills Allotment. In Nevada Department of Wildlife's Buffalo Hills input report in Table 15 on page 37, a total of 1,844.75 AUM's were identified as being needed for deer within these same townships and in nearly the identical area as the proposed seeding. In essence, the BLM District is proposing a large seeding on a small vital deer range which provides 16% of the identified demand for the entire resource area. An antelope demand of 269 AUM's or 11% of the resource area total was also identified as needed in this same general area (page 49 of Nevada Department of Wildlife's input report). There is also a significant sage grouse resource within this proposed treatment area which would be significantly impacted by this sagebrush control project.
- b. This same map in the DEIS identifies a proposed seeding at approximately T35N, R20E, Sections 2, 3, 4, 5, 6, 8, 9, 10, 11 and 12 in the Coyote Allotment. Nevada Department of Wildlife's Buffalo Hills input report indicates the need for 500 AUM's for antelope in this area in Table 27, page 49. This represents 21% of the need identified for the entire resource area.

12-5 | In both these areas, sagebrush represents the dominant vegetation; and most importantly, it is critical to big game using the area. These seedings have the potential to seriously impact (possibly eliminate given the worst circumstances) 16% of the deer population and 32% of the antelope population for the entire resource area.

Both instances combined represent only a small fraction of the proposed 230,112 acres of seedings and both probably represent the worst possible placement for big game, but just these two proposed seedings could result in reduced carrying capacities for deer by 300 animals and antelope by 150 animals presuming half of the affected populations could relocate. This does not consider the negative impacts anticipated because of period-of-use proposals (page 3-29), or impacts by seedings proposed by Susanville District on adjacent, contiguous big game ranges (see Tulead-Home Camp EIS), which emphasizes the inaccuracy of the Winnemucca District's anticipated impacts: "The effect of these treatments on the resource area deer herd would be a decline of 12 deer in the Buffalo Hills Allotment..." (page 3-35) or "In Coyote Allotment, the shortfall would be 20 head, and three head in Leadville Allotment." (speaking of seeding impacts on antelope on page 3-37). The BLM either did not use our submitted data or chose to disregard it. In these instances treatment is being applied on the most critical deer habitat in the resource area and on the most critical antelope habitat in the State. The Susanville District also proposed seedings on this same piece of antelope habitat.

Comment Letter 12

Mr. Mike Nolan
May 18, 1981
Page 4

Reductions in cover and food resources resulting from many of the proposed seedings are expected to have severe negative impacts on sage grouse, chukar partridge, and California quail. Adherence to the Western States Sage Grouse Committee "Guidelines" as specified in the Standard Operating Procedures would help ameliorate impacts to sage grouse.

It is not our intent to issue a blanket condemnation of vegetation type conversions and seedings, as there are circumstances where such actions can be beneficial to wildlife from several aspects. It is our position, however, that such projects when placed in certain wildlife habitats are most often detrimental to the species of concern. We therefore strongly recommend that the BLM maintain very close coordination with NDOW on site selection and project design for vegetal control land treatments.

The management of riparian communities is an issue which we feel is not adequately provided for in the proposed action or any of the alternatives, except the no livestock grazing alternatives. Recognizing that the Bureau is mandated by Congress to provide for multiple uses on public lands, the enhancement and management of riparian communities through the no livestock grazing alternative is not a viable option. The EIS points out the importance of riparian communities to fish and wildlife and further provides an accurate assessment of the conditions and trend of these very important communities. The EIS also (page 3-43) presents BLM policy on Wetland-Riparian Area Protection and Management. Yet, the document fairly states that these communities will, with few exceptions, continue to degrade under the proposed action management strategy. Because riparian areas and streams are so important to a broad array of fish and wildlife species, as well as livestock and people, we feel that these areas must receive special management attention. In fact, riparian communities are so significant to the Great Basin ecosystem, it is our recommendation that they be considered for designation as Areas of Critical Environmental Concern. Regardless of their classification, such areas should be fenced, as this may be the only possible solution to their unique management problems. Although such action is expensive, in light of the proposed expenditure of 16 million dollars for livestock support facilities under the proposed action, the expense of preserving these extremely valuable riparian areas certainly seems justified.

12-6 |

12-7 | A final area of general concern to us is the fact that several important wildlife species are not addressed in the EIS document. The most notable of these is the chukar partridge, as the Sonoma-Gerlach Resource Area supports some of the best chukar populations in the state.

Comment Letter 12

Mr. Mike Nolan
May 18, 1981
Page 5

We also anticipate that both beneficial (water development) and negative (vegetal control) impacts will result to this species from the proposed action. Other important species which are not addressed include California quail, cottontail rabbits, and furbearers, especially bobcats.

SPECIFIC COMMENTS

- 12-8 1. The allowable utilization levels for key species as presented in Table 1-4 appear to be acceptable, but these expressed levels should be field checked through the monitoring process to ensure that plant health and vigor is being maintained at these levels of use. The management factors presented under the General Implementation Schedule also are acceptable, except that in item 4, we would strongly recommend that consultation concerning the exemption of the suitability criteria be conducted with others, rather than just the user. In cases where important wildlife habitats are involved, the consultation process should also include the Nevada Department of Wildlife.
- 12-9 2. The period-of-use proposed for most livestock allotments is 6/1 to 2/28 (Table 1-1). The DEIS indicates this will have adverse impact on deer (page 3-29). The impacts may be larger than they predicted because of the failure to consider season-of-use in tandem with the proposed seedings (see General Comments).
- 12-10 3. No provisions to manage mountain brush types were included although our input emphasized this was necessary - refer to page 5 and Table 19 in Nevada Department of Wildlife's Buffalo Hills P.U. input report.
- 12-11 4. We endorse the Standard Operating Procedure with the following suggestions (listed by procedure number).
- 12-11 1. EA's on major projects should be routed through the State Clearinghouse for review and input by state agencies.
10. We strongly support this procedure, but would suggest that in some cases, it might be necessary to leave more than ten percent native vegetative cover in order to provide necessary wildlife cover and forage.
- 12-12 13. The Department desires to have input into fire management plans.


Comment Letter 12

Mr. Mike Nolan
May 18, 1981
Page 6

5. We do not agree with the inclusion of wildlife in the statement on page 2-21 under Other Wildlife: "Excessive use by domestic livestock, wild horses and burros, and wildlife has decreased habitat diversity within the resource area." We question whether data is available to support the inclusion of wildlife in this statement.
6. Under Threatened and Endangered Species (page 2-21), bald eagles do migrate through the area and sometimes use portions of the area for wintering.
- 12-13 7. The statements in the first and last sentences in the 5th paragraph on page 3-39 are in direct conflict.
- 12-14 8. Page 3-39, 6th paragraph, this statement is subject to challenge, as not all sage grouse habitat within sage grouse range has been delineated.
9. We question the conclusions presented in the Summary for Sage Grouse (page 3-40) as the continued degradation of riparian habitats coupled with vegetative type conversions will negatively impact sage grouse. The third paragraph on page 3-41 indicates that most species associated with riparian habitats would not be benefited under the proposed action, yet the conclusion for sage grouse is that they will benefit by as much as a 30% population increase. Improved condition of upland ranges should indeed benefit sage grouse, but this benefit could easily be offset by the above mentioned actions.

We hope that you will find these comments useful in formulating a state position, and that they will help the BLM in planning and implementing management actions which will improve public rangelands and attendant wildlife habitats.

Sincerely,


Joseph C. Greenley
Director

WM:pw

cc: Regions
Front Desk
Commissioners
Paul Bottari

Response Letter 12

12-1 Issue: Compliance with Nevada Revised Statutes

It is the Bureau's intent to comply with the State of Nevada Revised Statutes concerning water use. Also, this concern is addressed by Standard Operating Procedure Number 26, in the DEIS.

12-2 Issue: Insufficient Cultural Resource Data Base

The Standard Operating Procedures (page 1-30, DEIS) deal with the Programmatic Memorandum of Agreement. Under Standard Operating Procedures it states specifically that:

"Prior to project approval, intensive field (Class III) inventories will be conducted in specific areas that would be impacted by implementing activities. If cultural or paleontological sites are found, every effort will be made to avoid adverse impacts."

Mitigating measures for these projects will be determined on a case-by-case basis due to the fact, as noted in comment letter, that present inventory makes predictive statements "extremely tentative" (page 6-43).

The Standard Operating Procedures also state "The BLM is committed to upgrading cultural resource inventory data in the following area, as manpower and funding allow. In the Bureau's ongoing inventory, survey efforts are concentrated on those areas identified as being archeologically sensitive," i.e., spring developments, range improvements, etc.

The Standard Operating Procedures does not refer to a Class I inventory but the district presently has a Class I in progress to be completed by Fiscal Year 1981.

12-3 Issue: Allocation of Vegetation

See discussion on CRMP and Monitoring in the Summary section in the Final EIS.

12-4 Issue: Vegetation Allocation by Class of Animal

The reasonable big game forage demand represents a management objective based on current available data. Monitoring will be used to determine the effects that grazing systems and activity plans have on available vegetation and big game populations. There will be opportunities to include new data in the calculation of long term average big game populations on a case-by-case basis when monitoring reveals an increase of available vegetation on a permanent basis.

Response Letter 12

12-5 Issue: Proposed Sagebrush Control

Should the proposal to control sagebrush in these big game use areas be brought forth through the CRMP process, site-specific environmental assessments will be completed and mitigating measures implemented prior to on-the-ground treatments. See discussion on CRMP and Monitoring in the Summary section in the Final EIS.

12-6 Issue: Fencing Riparian Communities to Prevent Degradation

See response to Issue 8-5 in the Final EIS.

12-7 Issue: Chukar Partridge

Chukar partridge were not addressed in the DEIS, because significant impacts to this species resulting from the implementation of one of the alternatives or the proposed action were not anticipated.

12-8 Issue: Suitability Criteria Consultation Process

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

12-9 Issue: Period-of-Use

As analyzed in the DEIS (page 3-29, column 2, paragraph 3), it is anticipated that there would be only a slight chance that such an adverse impact would occur, because the proposed periods-of-use would be replaced by periodic rest in all but four allotments as allotment management plans are implemented. The remaining four allotments either contain very few deer or contain wild horses which would prevent such an adverse impact from occurring.

12-10 Issue: Management of Mountain Brush Type

Management strategies for mountain brush were discussed in the Grazing and Rest Treatments section on pages 1-5 and 1-8 of the DEIS. Treatment 2 would benefit curleaf mountain mahogany and antelope bitterbrush. Treatment 3 would provide needed rest (of two years minimum) to damaged browse species, following wildfire, to regain vigor and/or resprout. Treatment 8 would also benefit mountain brush, especially those species at the higher elevations, since domestic livestock would normally make use of the lower foothills and valleys during the winter.

Response Letter 12

12-11 Issue: State Clearinghouse Review

It is Bureau policy in Nevada to route environmental assessments and management plans on major projects through the State Clearinghouse for review.

12-12 Issue: Fire Management Plans

See response to Issue 12-11.

12-13 Issue: Conflicting Statements

The "Western States Sage Grouse Committee Guidelines for Habitat Protection in Sage Grouse Range" will be adhered to if the seedings in the Buffalo Hills, Coyote and Leadville allotments are proposed through CRMP. Also see Standard Operating Procedure 10, page 1-33 DEIS.

12-14 Issue: Delineation of Sage Grouse Habitat

There is little doubt that additional crucial sage grouse use areas occur which have not been identified. Impacts from land treatments would be extremely adverse to sage grouse if sagebrush were removed from areas encompassing unidentified crucial use areas. Since the location of these are not known, impacts (beneficial or adverse) could not be analyzed. Site-specific environmental assessments will be written to analyze the impacts on sage grouse as specific land treatments are proposed through the CRMP process.

Comment Letter 13



975 Fifth Street - Elko, Nevada 89801
(702) 738-9214

May 22, 1981

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EXECUTIVE COMMITTEE Dear Sir:

E. E. (Ned) Eyre
Eureka

Wayne Martoney
Elko

James B. Tennille
Caliente

W. W. (Bill) Hall
Paradise Valley

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Clover Valley, Wells

Dave Secrist
Elko

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

The Nevada Cattlemen's Association provides the following comments on the Sonoma-Gerlach Grazing Environmental Impact Statement - Draft.

General Comments:

We do not support the use of forage inventories, including those in the 1947 and 1960 surveys, to establish stocking rates. Forage inventories have not proven to be a reliable means to base stocking rates on. These inventories are highly subject to manipulation and personal bias; and if challenged in court would surely not stand up to scrutiny.

We do support the basing of future stocking rates upon data derived from long-term monitoring of trend and utilization. Along this line, we support leaving livestock numbers at their present level and making adjustments in the future based upon the results of trend studies. This is the most reliable means to determine what the actual effect of livestock grazing is on the resource. If the quality of monitoring is of a consistently high level, the results will provide the most accurate, and least challengeable, indication of range condition trend. All entities concerned with range condition will be assured that data necessary to make good range management decisions is available.

More Specific Comments: CRMP

Co-ordinated Resource Management Planning can be effective if local users are involved and the CRMP group responds on a request basis.



NATIONAL CATTLEMEN'S ASSOCIATION
Affiliate Member

Comment Letter 13

Wild Horses

It is essential that wild horse numbers be reduced as soon as possible to reasonable levels if good resource management is to be ensured. Once reduced to a reasonable level, they should be kept to a manageable level as required of other public land users.

Range Improvements

Range improvements should be implemented as soon as possible. A.M.P.'s should not be mandatory before improvements are allowed. These improvements benefit wildlife and wildhorses and burros, as well as livestock. The sooner they are implemented, the sooner the public will realize their benefits.

Season of Use

13-2

No livestock grazing during early growth is not always necessary. We do not support this decision on an area or district-wide basis. Size of the allotment, stocking rate, type and species of forage, and prior use, all play a part in determining if a no livestock grazing during the early growth is necessary. If the trend is static or improving, there should be no reason to restrict use during early months.

Summary

Wild horse numbers should be reduced to a reasonable number as soon as possible. Once this is accomplished, trend and utilization studies should be established throughout the area and on all allotments. Livestock and wildlife numbers should be kept at their present levels, and future adjustments made using data from the long-term trend and utilization studies.

Thank you for your consideration of these comments.

Sincerely,

Paul Bottari, Executive Secretary

PB/sk

Response Letter 13

13-1 Issue: CRMP

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

13-2 Issue: Season-of-Use

See response to Issue 6-3 and the discussion on the CRMP in the Summary section in the Final EIS.

Comment Letter 14

Marvel Brothers Ranching Co.
P.O. Box 1567
Battle Mountain, Nevada
May 21, 1981

Mr. Gerald Moritz
Bureau of Land Management
701 East Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Moritz:

Thank you for the opportunity to review and offer comment on the Bonoma-Gerlach Grazing Environmental Impact Statement. After reviewing it, we submit the following.

14-1

1. We are not satisfied that the information plotted in the Range Studies Map, that is acquired from range trend plots, is valid. We feel there are not enough range plots for the purpose of trend determinations for accurate predictions to be made. Analyses of existing plots are often made by persons unqualified to recognize what is actually occurring in respect to percent of use. We recommend allowing the permittee to be present when the plots are evaluated and have his opinion officially recorded along with those of the BLM.

14-2

2. We do not understand the inference of Appendix I that 1,620 AUM's in the South Buffalo allotment are unsuitable. How was this arrived at? We would also like to know the exact location of the 52,300 acres that are classified as unsuitable in this allotment.

14-3

3. In reference to Appendix J, Section 1, how do you arrive at the conclusion that 83% of the South Buffalo allotment is in poor condition and that 91% of the same allotment is in a downward trend? The range studies map of trend plots included in the DEIS doesn't have several trend plots, that we know to exist, even on the map. This leads us to believe that the conclusions drawn from this study are inaccurate due to incomplete data collection.

14-4

4. In respect to cattle not using slopes over 50% we would be pleased to show any of the personnel who draw these conclusions where use of these steeper slopes has been made by cattle without causing soil erosion or overgrazing of creek bottoms.

Comment Letter 14

14-5

5. In review of Appendix B, removal of cattle from the public range in March and April is unwise from a cattle management standpoint. Most of the cows are either calving or very near calving during these two months. They need browse and a little green grass to prepare them for this ultimately stressful period. This is a critical period in respect to health of the cattle. For us to do extensive gathering and then driving our cattle thirty to sixty miles at that time would cause unnecessary economic hardship to ranchers due to increased calving death loss.

In conclusion, we are sure that good coordinated efforts between the Bureau of Land Management and the ranchers will satisfy the needs of all involved. We feel this can be done without putting Nevada's Livestock industry in jeopardy.

Sincerely,

Joe Marvel
Joe Marvel

Pete Marvel
Pete Marvel
Marvel Brothers Ranching Co.

14-1 Issue: Range Monitoring

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

14-2 Issue: Range Suitability Criteria

The application of the proposed suitability criteria to the 1947 and 1960s range survey for vegetation allocation analysis is explained in Appendix A, Section 1 (page 6-1) of the DEIS. Also, see response to Issue 7-4 in the Final EIS.

14-3 Issue: Rangeland Condition and Trend

Methodology for determining estimated present range condition and trend for the Sonoma-Gerlach Resource Area is discussed in Chapter 2, Ecological Range Condition and Trend sections (page 2-11) and Appendix J (page 6-35) of the DEIS. Because of the small scale used on the reference maps, it is difficult to show exact locations or completeness of projects and plots. Also, refer to the discussion on CRMP at the beginning of the Summary section in the Final EIS.

14-4 Issue: Range Suitability Criteria

See response to Issue 7-4 in the Final EIS.

14-5 Issue: Period-of-Use

There would be adverse impacts to livestock grazing from the proposed periods-of-use as discussed in Chapter 3, Livestock Grazing (page 3-25, DEIS). However, the projected benefits from the proposed periods-of-use and/or grazing systems on the vegetation resource would in the long-term, greatly offset any adverse impacts to livestock grazing. Also, see response to Issue 6-3 in the Final EIS.

The Wildlife Society

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

21 May 1981

Mr. Frank C. Shields, District Manager
Bureau of Land Management
705 East 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 Sonoma-Gerlach Resource Area and our comments follow.

This is a very well prepared DEIS. It has been well written and the discussions are succinct, to the point, and provide an accurate description of the existing situation, proposed action, and alternatives. We support your proposed action--vegetation allocation--and our comments will concentrate on it.

15-1

Forage Allocation. The demands (reasonable numbers) of big game species will be for the most part met by forage allocation, which we support. We question that there will be no additional AUM's reserved for big game even if these become available. It is discouraging to see all additional forage which accrues from management and range improvement allotted to livestock and wild horses and burros. Considering that hunter demand (as evidenced by permit applications) far exceeds supply, we urge you to reconsider the DEIS and make an effort to allocate additional forage for big game, even if it means going back to the Nevada Department of Wildlife (NDOW) and asking them to update their figures. The Nevada Chapter also questions the concept of forage allocation in the No Livestock Grazing alternative. We cannot see a need for allocation since current populations of big game and wild horses and burros are a long way from filling the AUM consumption gap caused by removal of livestock.

Small Habitats, including Streams. There are 4,259,842 acres of public land in the DEIS area: only 5,817 of these acres are riparian, aspen, or meadows. Less than two tenths of one per cent of the land area is covered by what we consider to be very important habitats. These habitats are essential to the continued survival of at least 75 per cent of the vertebrate species using the DEIS area. If they are 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-

The International Organization of Professional Wildlife Ecologists and Managers



Comment Letter 15

Mr. Frank C. Shields Page 2

15-2 including streams- is to be maintained or improved per the number 6 objective of Summary Table 6, yet every action except no livestock grazing will degrade this habitat in the DEIS area. There is no proposal to protect these habitats by fencing or other means, although the degradation problem is well covered in chapter 3. The Nevada Chapter cannot accept this, nor can we accept the DEIS premise that degradation will be insignificant. Any degradation is significant, considering the very small acreage involved, and its tremendous importance to wildlife. We urge you to reconsider this entire situation and provide for fencing in the final EIS, as fencing is the only management facility known to protect riparian and stream habitats from degradation by livestock. The cost needed to do this will be insignificant compared with the total estimated cost of implementing the proposed action. After all, protection of these habitats is required by BLM manuals, Presidential executive orders, and FLPMA.

15-3 Sagebrush control and Seeding. The total of 230,112 acres of vegetal control is a tremendous amount by anyone's standards. We urge you to consider using every possible means except seeding (which includes water developments, fencing, and proposed grazing treatments) for two full grazing cycles, if possible, before embarking on this major program. Barring that, we support the program except on two big game areas, and as long as the BLM follows the Western States Sage Grouse Committee Guidelines for Habitat Protection in Sage Grouse Range (which is commendable). Seedings as shown on the map "Proposed Land Treatments..." in the Buffalo Hills and Coyote allotments would adversely affect both deer and antelope populations in these areas, and should be reconsidered, since the deer and antelope populations in these allotments are significant in the DEIS area. The Nevada Chapter urges the BLM to closely coordinate these vegetal control jobs with NDOW.

15-4 Bighorn Sheep. How firm are the release site proposals? The Nevada Department of Wildlife has discussed proposed releases on public lands in several BLM districts and urged the BLM to develop habitat management plans and environmental analyses, etc., only to change their (NDOW'S) plans or priorities. Thus releases have not been made or have been delayed several years. Something you might consider is to concentrate sheep releases in only two or three areas, and let the forage allocated to the other sites revert to use by mule deer and antelope where they are present.

15-5 Chukar. The DEIS does not address the most important upland game species in the area--chukar. It is surprising that this species was omitted. The Sonoma-Gerlach area has some of the best chukar populations and finest hunting anywhere in the United States, based on our knowledge, experience, and NDOW data. While chukars do not utilize sagebrush for food, it does provide essential escape cover. In areas where sagebrush has been removed, such as by fire or mechanical or chemical means, use by chukars is low, even

Comment Letter 15

Mr. Frank C. Shields Page 3

if there is a good stand of cheatgrass. We urge you to put a thorough discussion of chukars into the final EIS, as they are such an important species, and to coordinate all proposed vegetal changes very closely with NDOW personnel.

15-6 Maps. These are generally easy to read and understand, and have adequate color contrast. On the map showing Existing and Proposed Range facilities, we suggest the following additions: somewhere on the map title put in it that this is for the proposed action; put down the numbers of miles of fence, pipeline, acres of seeding, etc., for both existing and proposed, to give the reader a good perspective of the entire situation.

In summary, this is a very well prepared DEIS. We urge you to make the changes we have suggested, particularly as these apply to riparian habitats including streams, and proposals for vegetal control.

We thank you for the opportunity to comment, and wish to be kept on all mailing lists for the final EIS, plus all segments of CRMP.

Sincerely,

William R. Brigham

William R. Brigham
President

Response Letter 15

15-1 Issue: Forage Allocation

See response to Issue 12-4 in the Final EIS.

15-2 Issue: Riparian Degradation

See response to Issue 8-5 in the Final EIS.

15-3 Issue: Sagebrush Control

See response to Issues 8-2 and 12-5 in the Final EIS.

15-4 Issue: Bighorn Sheep

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

15-5 Issue: Chukar

See response to Issue 12-7 in the Final EIS.

15-6 Issue: Maps

The fences, pipelines and seedings proposed are in Table 1-5 on page 1-10 of the DEIS. As for existing facilities, this information is available in project records. In certain areas, however, especially on very old projects, these records are incomplete.

Comment Letter 16

May 22, 1981

Frank Shields, District Manager

Bureau of Land Management

Winnemucca, Nevada, 89445

Re: EIS-Sonoma-Gerlach District

Dear Mr. Shields:

We are responding to the recently released EIS Draft of the Sonoma-Gerlach District.

16-1

First, the range survey or AUM's is not a true summary of the area, because they referred to the 1947 and 1960 surveys. They were not updated! These years happen to be two of the driest years during the last 30 to 40 years. The real problem is that the AUM's allocated for the Sonoma-Gerlach area are 153,000 AUM's and you intend to cut this to 115,000 AUM's in 1982. This is a 15% cut in the first year! During the last ten years, this area has had exceptionally good moisture. We all know that this varies from year to year, but we do have ample forage left over from the previous year. In the good moisture years, you never mention increasing the AUM's. It is ironic that just this mornigg, we heard on the Nevada news that Mr. Ed Spang, State B.L.M. Director, stated that there is so much dry forage that there is a fire hazard condition. Why haven't the AUM's been increased to try to alleviate this condition?

16-2

Chât grass is a very good forage, and yet the BLM "policy" is to consider this grass as 10% for two months of the grazing season. This BLM policy is not justified. Most all the range surveys in

Comment Letter 16

recent years, prepared by people other than the B.L.M., have indicated that this forage is vastly underrated and should be allotted more grazing value.

A June 1 turn out date would carry a devastating impact on livestock operators in the entire west. The cost of additional feed would make it economically impossible to stay in the livestock business. We realize that the B.L.M. would prefer to have all livestock off the ranges entirely.

16-3

According to your analysis, 10% forage value is allotted to Cheatgrass, an annual, and 90% forage value is allotted to the perennial plants. According to Webster's Dictionary: "a perennial lasts for years, continuing without cessation or interruption, never-failing, continuing to live for years." Thereby, where does the reasoning of no grazing until June 1, "after the plants have seeded," warrant this consideration? These perennials, during an extremely dry period, remain semi-dormant until such time as sufficient moisture renews it. If 90% of the range is perennial, where does reseeding apply?

16-4

According to your survey, cattle will not graze a 50% slope. We have observed, through many years of working with livestock, that as the hot season commences, the cattle, if allowed, will proceed to cooler areas which are found on the mountainsides. Have you observed the trails spiraling to the tops of mountains? Have you observed the moisture captured in those trails after a rain or spring thaw?

We, as ranchers, want to maintain multiple use of our ranges, but we still want to utilize it in a more efficient manner in the wet years as well as the dry years. In recent

Comment Letter 16

years, the ranchers and miners have had very little input into the BLM decisions. The local and state advisory boards have very little influence on changing any B.L.M. decisions, as it indicates in the EIS Draft. As a director of the State Advisory Board (N-2 District), I am well aware of this.

Sincerely,

Robert C. Vesco
Robert C. Vesco
Diana L. Vesco
Diana L. Vesco

P.O. Box 506

Winnemucca, Nevada, 89445

Response Letter 16

16-1 Issue: Range Survey

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

16-2 Issue: Cheat Grass

See response to Issue 7-1 in the Final EIS.

16-3 Issue: Period-of-Use

In response to the question of 'where does reseeding apply,' refer to Chapter 3, Ecological Range Condition and Trend of Vegetation Communities section (page 3-10) and the Vegetation Production section (page 3-17) of the DEIS. Also see response to Issue 6-3 in the Final EIS.

16-4 Issue: Range Suitability Criteria

See response to Issue 7-4 in the Final EIS.

Comment Letter 17



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California
P.O. Box 8096 - University Station - Reno, Nevada 89507
1685 Kings Row Reno, NV 89503
(702) 747-4237

May 22, 1981

Ed Spang, Director
BLM/Nevada State Office
P. O. Box 12000
Reno, NV 89510

Dear Director Spang,

The Public Lands Committee of the Toiyabe Chapter of the Sierra Club submits the following comments on the draft EIS on the Sonoma-Gerlach Resource Area. We are addressing our comments to you to insure receipt by BLM. After many hours of work on our comments for the draft EIS for Paradise-Denio, also in the Winnemucca District, we have received neither acknowledgement of their receipt, response to any questions raised, nor acceptance or rejection of our proposed "Land Resource Maximizing Alternative." At this point, we surmise that the BLM Winnemucca District will advise us just before the FEIS is published, that they have insufficient time to include our alternative in the FEIS (despite its submittal on 3/27/81).

With this experience and others, we feel that ELM is less than unequivocal in its use of public comments which it is legally required only to solicit. In addition, in this instance, the Sonoma-Gerlach DEIS is remarkably similar to the Paradise-Denio DEIS in format and in content. Therefore, we would like to incorporate by reference our comments on the P-D DEIS into these comments. We would also like to incorporate our comments of 8/4/80 on the MFP-II for S-G, as their receipt was also never acknowledged and the stated concerns do not appear to have been incorporated into the DEIS.

We would like to include the following specific comments based on our very cursory review of the DEIS:

- 17-1 |
- 17-2 |
- 17-3 |
- 1) The adverse impacts to the "aquatic habitat" of the proposed alternative is in direct violation of ELM's own regulations and totally non-acceptable.
 - 2) The expenditure of over \$16,000,000 on range improvements to benefit primarily the livestock industry is not only a violation of multiple use, but ridiculous in view of the budget cuts proposed for nearly all federal programs.
 - 3) Even more shocking is the area of native vegetation proposed to be destroyed - over 230,000 acres - some of which provides critical habitat for wildlife. The DEIS

... To explore, enjoy, and protect the natural mountain scene ...

Comment Letter 17

p. 2 SIERRA CLUB

does not establish the public benefit of such an expenditure, nor adequately analyze the negative impacts of such a huge disruption to the ecosystem of the area.

17-4 4) We totally oppose any vegetative destruction or reseeding in the Buffalo Hills and the Coyote Allotments due to the adverse impacts of such destruction on critical deer and antelope habitat.

17-5 5) We also oppose the scheme to allocate all increased forage to livestock and the few remaining wild horses. As we understand it, "reasonable" numbers are just that - reasonable given current conditions. As conditions improve, "reasonable" numbers should also increase.

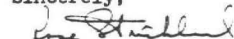
6) Given that 78% or 3,283,573 acres of the S-G R.A. are in poor or fair condition, the proposed 2% reduction in livestock use appears to be somewhat inadequate and unreasonable. Perhaps the DEIS authors plan to drown the rangeland problems in millions of dollars for range improvement - a solution which is financially, ecologically, and politically bankrupt!

7) The DEIS is inadequate in providing any rationale for the "optimum" numbers of wild horses and burros. Confining wild horses in "herd management areas" is a violation of the free-roaming status of the animals and also of the Wild Horse and Burro Act.

8) The proposed use of CRMP appears to be an abnegation of BLM's responsibility to manage the public lands for the public. While agency staff - federal, state, and local - are paid to attend CRMP meetings and permittees can deduct their travel as a business expense for the one allotment they are directly involved in, representatives of other public land interest groups must pay their own travel, and arrange time off their jobs in order to participate in CRMP. We regard this as a private subsidy by wildlife, conservation, and wild horse volunteers to legitimize CRMP. CRMP may be an infringement of our rights to participate in the BLM planning process, due to its financial requirements.

We hope you realize that the negative tone of these comments is a reflection of our disenchantment with BLM's "planning" for the public lands as well as of our frustration over our effective disenfranchisement from participating in decision making on the public lands and the apparent and intentional nullification by BLM of the entire EIS process. While we could spend some time commenting on the positive aspects of the Sonoma-Gerlach DEIS, we feel such time would also be wasted as BLM decisions on our public lands are strictly of a political nature and do not depend on public input. Nor do they reflect in any regard an understanding of environmental impacts of actions, their ecological or financial legitimacy, nor of any particular concern about the lands which are entrusted to your care.

Sincerely,



Rose Strickland
Public Lands Committee
Toiyabe Chapter of the Sierra Club

Response Letter 17

17-1 Issue: Comments Made in Paradise-Denio DEIS and Scoping

The data base and impact analysis for the Sonoma-Gerlach DEIS are significantly different than that used for the Paradise-Denio DEIS, which makes it difficult to incorporate the specific Paradise-Denio comments into the Sonoma-Gerlach Final EIS. However, wherever it is possible, the management concerns expressed in the Paradise-Denio DEIS comment letter will be considered in the Sonoma-Gerlach Resource Area. In regards to the MFP II comments, these concerns are under consideration at this time by the District Manager as he prepares to make his MFP III decisions.

17-2 Issue: Aquatic 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 a 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.

17-3 Issue: Land Treatments

The analysis of proposed land treatment was covered in several sections of the DEIS and represents both the beneficial and adverse impacts from land treatments. Refer to Chapter 3, Ecological Range Condition and Trend of Vegetation Communities Section (page 3-10), Vegetation Production Section (page 3-17), Livestock Grazing Section (page 3-23), Big Game - Mule Deer Section (page 3-29), Antelope Section (page 3-37), Bighorn sheep Section (page 3-38), Upland Game - Sage Grouse Section (page 3-39), Other Wildlife Section (3-40), Visual Resources (page 3-47), Cultural Resources - Range Developments Section (3-49), Wilderness Potential Section (3-51), and throughout the Economics Section (starting on page 3-52). The above mentioned sections relate to proposed land treatments in the proposed action. In addition, beneficial and adverse impacts on the proposed land treatments are discussed for each alternative in the DEIS (see respective sections for each alternative).

17-4 Issue: Proposed Land Treatments - Critical Habitat

See response to Issue 12-5 in the Final EIS.

17-5 Issue: Increased Allocations

See response to Issue 12-4 in the Final EIS.

Comment Letter 18

LAW OFFICES OF

EISENHOWER, CARLSON, NEWLANDS, REHA, HENRIOT & QUINN

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CHARLES D. HUNTER, JR. (1985)
GUY T. ELLIOTT (1978)

May 15, 1981

TELEPHONE
572-4800
AREA CODE 206

Mr. Edward F. Spang
State Director, Nevada
Bureau of Land Management
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Re: Comments of Summit Lake Paiute Tribe on
draft Sonoma-Gerlach grazing environmental
impact statement

Dear Mr. Spang:

This firm represents the Summit Lake Paiute Tribe of
Indians. The Summit Lake Paiute Tribe hereby submits to BLM
its comments on the draft Sonoma-Gerlach grazing environ-
mental impact statement. Those comments are as follows:

1. On page 1-30 of the DEIS, in the paragraph entitled
"Standard Operating Procedures" there is a brief statement
concerning how threatened or endangered plant or animal
species' clearance is required before implementation of any
project. We believe that the DEIS should more specifically
describe the standard operating procedures which are used in
connection with endangered and threatened species' clear-
ance. This should include references to any criteria which
are used.

In this connection, we would also point out that while you
note that consultation with the Fish and Wildlife Service per
§7 of the Endangered Species Act is necessary if a
threatened or endangered species or their habitat may be
impacted, there is nothing in the DEIS concerning the §7
consultation which is currently underway between BLM and FWS
concerning grazing on upper Mahogany Creek. We believe that
this is a glaring deficiency in the DEIS. The §7 biological
opinion of the Fish and Wildlife Service concerning grazing
on upper Mahogany Creek is an essential part of the final
environmental impact statement.

Comment Letter 18

Mr. Edward F. Spang
May 15, 1981
Page 2

2. Your map entitled "Proposed Land Treatments and
Facilities Existing Livestock Support and Management
Facilities" shows that sagebrush control and seed programs
are scheduled for areas adjacent to and northwest of the
Summit Lake Reservation and adjacent to and south of the
Summit Lake Reservation.

- 18-1 With regard to the proposed sagebrush control and seed area
adjacent to and northwest of the Summit Lake Reservation,
the DEIS should specify measures to be taken to insure that
there is no adverse impact on the Summit Lake Reservation
and particularly the water resources of the Summit Lake
Reservation.
- 18-2 With regard to the sagebrush control and seed area south of
the Summit Lake Reservation, we note that on your map
entitled "Proposed Wilderness Study Areas" the same area is
included in the North Black Rock Range proposed wilderness
study area (NV-020-622). It seems to us that there is an
inherent conflict between this sagebrush control program and
a wilderness area. The environmental impact statement
should address this conflict. The EIS should also discuss
measures to be taken to protect the water resources of the
Summit Lake Reservation.
- 18-3 3. On Table 2-8 you list Mahogany Creek as a stream
within the resource area. Under "Current Conflicts," live-
stock should have been listed. This is because of problems
with livestock grazing in the upper Mahogany watershed on
land owned by Mr. Kenneth Earp and on BLM land to which Mr.
Earp has grazing rights.
- 18-4 4. On page 2-30 you discuss current recreation
resources in the affected environment. In this section, you
mention the importance of Mahogany Creek as a natural area
and spawning ground for a rare species of trout. The refer-
ence, of course, is to the Lahontan cutthroat trout. While
this section may not be totally appropriate for the discus-
sion, somewhere in Chapter 2, there should be a discussion
of the importance of the Mahogany Creek and Snow Creek
watersheds and Summit Lake to the Summit Lake Paiute Tribe.
The discussion should not only include the importance of
these resources to the Tribe as recreation areas but also as
sources of livelihood and for their cultural and historical
importance. Chapter 2 of the DEIS is definitely deficient
in that it lacks this discussion of the importance of these
water resources to the Summit Lake Paiute Tribe.

Comment Letter 18

Mr. Edward F. Spang
May 15, 1981
Page 3

- 18-5 5. On page 3-6 of the DEIS, there are several subsections under the heading "Water Quality". In these subsections, the turbidity, temperature and fecal coliform bacteria status of a number of streams is discussed. Unfortunately, the discussions do not specify which streams are involved. The final EIS should specify the streams which are being discussed.
6. On page 3-43 of the DEIS under the heading "Fish Populations" you state that the threatened Lahontan cutthroat trout would be adversely affected by continued grazing along the unfenced portions of Mahogany Creek and Summer Camp Creek. This section should be expanded to specify the adverse impacts which are expected. This might be done in connection with the inclusion in the final EIS of the \$7 biological opinion of the Fish and Wildlife Service. The final EIS will be defective in this regard unless the adverse impacts are pointed out with more specificity.
- 18-6 7. On Table 2-6 of the DEIS, you describe the present livestock grazing situation. We believe that this table should be expanded to include information concerning the date upon which the present permitted use began, the area covered by the present permit, the number of cattle presently using the permitted premises, the proposed term of the permit, and the amount of privately owned grazing land each permittee owns. At present, table 2.6 bases permittee dependency upon a comparison of total herd size to AUM's available on BLM land. We believe, however, that the correct test of dependency is to compare AUM's available on the permittee's privately owned land, AUM's available on BLM land and the number of AUM's necessary for the permittee to maintain a moderate livelihood.
- 18-7 8. The DEIS should include a discussion of what effect, if any, the designation of the Lahontan cutthroat trout natural area or the entire Mahogany Creek watershed as an Area of Critical Environmental Concern would have on grazing and any grazing permits issued by BLM. At present, such a discussion is not included in the EIS.
- 18-8 9. The environmental impact statement should discuss with more specificity the effect grazing has on the BLM plans to rehabilitate the deteriorated habitat on Mahogany Creek. In terms of the requirements of the National Environmental Policy Act that BLM address "any adverse environmental effects which cannot be avoided should the

Comment Letter 18

Mr. Edward F. Spang
May 15, 1981
Page 4

- proposal be implemented" we believe that BLM will have to come to grips with the fact that any grazing in the Mahogany Creek watershed will have an adverse impact on the Lahontan cutthroat trout habitat and fishery in violation of the Endangered Species Act. This situation must be addressed in the impact statement.
- 18-9 10. The importance of and the national duty to protect the threatened Lahontan cutthroat trout vis a vis the desirability of allowing cattle grazing in the Mahogany Creek water shed must be compared and discussed both with regard to "the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity" and "any irreversable and irretrievable commitments of resources which might be involved in the proposed action should it be implemented." This discussion is not included in the present DEIS.
- 18-10 11. The "economics" and "social conditions" sections of Chapter 3 must be expanded to discuss the impacts of the proposed action on the Summit Lake Paiute Tribe and the Summit Lake Paiute Reservation. At present, the discussion focuses entirely on the effect that the proposed action will have on local ranchers in the area. There is no attempt made to discuss impacts on the Summit Lake Paiute Tribe. That is a major deficiency of the DEIS.
- 18-11 12. The DEIS must address the question of whether the proposed action will violate the Summit Lake Paiute Tribe's reserved rights to maintain the Lahontan cutthroat trout fishery in Summit Lake and Mahogany and Snow Creeks. It must also consider whether the proposed action will infringe upon the Tribe's reserved rights to maintain the water quality of these water resources.
13. In terms of the discussion of alternatives to the proposed action, we believe that the DEIS should address the following potential alternatives:
- 18-12 A. Allowing no further livestock grazing on BLM land within the Mahogany Creek watershed. This might include buying out existing grazing privileges pursuant to the provisions of the Federal Land Management and Policy Act.
- 18-13 B. BLM purchasing existing privately owned land in the upper Mahogany Creek watershed and including it within the Lahontan cutthroat trout natural area. This

Comment Letter 18

Mr. Edward F. Spang
May 15, 1981
Page 5

might be accomplished by outright purchase or by trading other BLM land for the private land.

18-14

C. Mitigation for any adverse impacts caused by grazing in the upper Mahogany Creek watershed. This might include BLM support for the Summit Lake Paiute Tribe's hatchery program or other fishery protection programs.

The above represents the comments of the Summit Lake Paiute Tribe on the Draft Environmental Impact Statement. We would appreciate receiving a copy of the final environmental impact statement when it is ready.

Sincerely,



Michael R. Thorp
Tribal Attorney, Summit
Lake Paiute Tribe

MRT/cwp

cc: Lorieta Cowan,
Tribal Chairman
Members of the Tribal Council
Robert L. Hunter,
Superintendent, Western
Nevada Agency
Don Miller, Native American
Rights Fund
William Cowan, Manager
Tribal Fishery Program

Response Letter 18

18-1 Issue: Range Improvements

As stated in Standard Operating Procedure number 1 in the DEIS, environmental assessments will be done prior to implementation. At such time, these concerns would be addressed.

18-2 Issue: Range Improvements - Wilderness Area Conflict

Proposed range improvements conflicting with proposed wilderness areas was recognized and addressed in the DEIS on:

Page 3-10, last paragraph;
Page 3-88, second column, first paragraph; and
Page 3-105, second column, second paragraph.

18-3 Issue: Table 2-8

See Chapter II Errata in the Final EIS.

18-4 Issue: Effects of the EIS on Summit Lake Paiute Tribe

Our preliminary analysis revealed that the allocation of vegetation in the Mahogany Creek area would not impact the recreation and cultural values of the Summit Lake reservation. It is felt that the present discussion concerning the Mahogany Creek and Snow Creek watersheds contained in the DEIS is adequate as far as the effects the alternatives would have on them and that no further discussion is needed in the Final EIS.

18-5 Issue: Lack of Identified Streams

Those streams exceeding water quality criteria were documented by the 1980 Sonoma-Gerlach Water Quality Inventory. Whether or not any stream exceeds Nevada water quality criteria depends on the density of livestock and the level of flow for that particular year. This will change, stream by stream and year to year, resulting in a variation in the number of streams exceeding the various Nevada water quality criteria. Whether any particular stream will exceed some of these criteria year after year also depends on these factors and therefore, the water quality history of any stream may be variable.

The 1980 Sonoma-Gerlach Water Quality Inventory are the only data available and are indicative of general conditions for 1980. A copy of this inventory is available in the Winnemucca Office for public review and a copy was sent to the Summit Lake Indian Tribe upon completion of the inventory in 1980.

Response Letter 18

18-6 Issue: Table 2-6

It is felt that such information is not necessary for the impact analysis, but such information is in the files of the District Office and is available to the general public.

18-7 Issue: Designate Mahogany Creek as an ACEC

If the area of concern were to be designated as an Area of Critical Environmental Concern (ACEC), a management plan for the area would be developed which would identify compatible and non-compatible uses. If the plan receives final designation as ACEC, only those uses found compatible with the maintenance of the Mahogany Creek watershed and its benefit to the Lahontan Cutthroat Trout would be allowed. In addition to setting a special management requirement for the area, the plan establishes a special management priority for that area. There is presently no grazing in the enclosure area. The designation of this area as an ACEC would have no effect on the grazing permits in the Mahogany Creek area.

18-8 Issue: Effects of Grazing in Mahogany Creek

That portion of Mahogany Creek which can be totally protected by BLM has been fenced. The rest of Mahogany Creek and Summer Camp Creek, much of which is private or on the Reservation, will be managed through coordinated resource management planning in which the protection of the stream will be a primary objective.

18-9 Issue: Protection of Lahontan Cutthroat Trout

The relationship between livestock grazing and aquatic and riparian habitat condition was discussed in the DEIS. Due to the general nature of the DEIS, the effects of grazing on Mahogany Creek could not be discussed. Standard Operating Procedure Number One on page 1-30 states that environmental assessments will be conducted prior to project initiation of any nature. At such time, the specific points in the comment letter will be site-specifically addressed. In addition, activity plans will be developed through CRMP which may or may not encourage livestock grazing in this area.

18-10 Issue: Economic and Social Impacts

See response to Issue 18-4.

Response Letter 18

18-11 Issue: Effects of the Proposed Action on the Lahontan Cutthroat Trout

It states in the DEIS, page 3-43, that the proposed action would have no effect on warm water fishes.

18-12 Issue: No Livestock Grazing in Mahogany Creek Watershed

The No Livestock Grazing Alternative addresses this. See page 3-81 of the DEIS.

18-13 Issue: BLM Purchase Private Lands

There is an MFP II recommendation to acquire through exchange, transfer or whatever those private lands within the upper Mahogany Creek watershed. If this recommendation is accepted, then those lands would become part of the natural area.

18-14 Issue: Negative Measures

The existing enclosure on Mahogany Creek has proven beneficial as far as mitigating adverse affects caused by grazing in the upper Mahogany Creek watershed. Also, if the area becomes an ACEC, such a designation will serve to further support such mitigation.

W H O A !

BOARD OF TRUSTEES

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In Memoriam
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 VELMA B. JOHNSTON, "Wild Horse Annie"

**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 323-5908
 Area Code 702

May 15, 1981

Mr. Edward F. Spang, State Director
 Department of the Interior
 Bureau of Land Management-Nevada State Office
 300 Booth Street
 Post Office Box 12000
 Reno, Nevada 89520

Re: Sonoma/Gerlach Grazing DEIS

Dear Mr. Spang:

Thank you very much for the opportunity to comment on the Sonoma-Gerlach DEIS. The direction of the Bureau under the current administration has been duly noted; however, nothing in the regulations or the law allows the Bureau to atrogate it's responsibilities by induendo. Specific laws regulations and policies are still intact and therefore are to be abided by, until such a time as they are repealed. Sonoma-Gerlach is in violation of several portions of the Wild Horse Act, therefore we respectfully submit our objections to this document.

We have concluded that this document, not unlike the Paradise-Denio, has identified a significant adverse impact on wild horses and burros under the proposed and alternative actions (excepting the no grazing). The document does not sufficiently analyze the negative impacts in detail and therefore you should prepare an additional environmental statement on wild horses and burros.

No statistical procedure is available which will make data collected under different conditions comparable in addition to the degree of error with aerial inventories. No indication is given as to the percent of use by wild horses, wildlife, livestock on the 4.5 million acres. Your 'best available' information only confirms our claim that reduction and reduction only is the perception of responsibility under PL 92-195.

While inventories are not necessary to allocate forage or determine optimum numbers for the resource, the importance and significance of an inventory to establish numbers to be left is essential. What techniques are used to separate wild horse use from that of livestock?

19-1 | Does the DEIS reflect the reduced income of the counties on the inventory tax? For the public's benefit the EIS should relate the



Page two

Sonoma-Gerlach DEIS

of Federal subsidies for livestock production on the rangelands, i.e., SCS, range improvements, agriculture, predator control, grasshopper control, etc. More than a little is made about the costs pertaining to the horse program and we feel it is only fair the public understands what exactly it costs them, as taxpayers, for the livestock industry,

The economic returns are unrealistic and not applicable in this day and age, please explain how you justify those millions on single use?

In summary, we will not point by point in the Sonoma-Gerlach point out the 'single use' benefits we feel this document reaks with; but instead challenge you to make a decision based on this data; challenge you to eliminate the horses from their historical habitat. Knowing from experience from previous documents, this one will never be implemented either, or at the least will be litigated to death.

W H O A ! does not support, and in fact we will seek measures to assure, this proposal is not implemented as it applies to wild horses and burros. We are sadded again, that this is the result of the Bureau's interpretation of multiple use.

Most sincerely,

Dawn Y. Lappin (Mrs.)
 Director

cc: Board of Trustees
 API
 Sierra Club
 NRDC

19-1 Issue: Inventory Tax

The purpose of the DEIS was to analyze impacts resulting from the implementation of the alternatives including the proposed action. Therefore, economic impacts resulting from the abolishment of the Inventory Tax are not discussed in any of the alternatives or the proposed action.



The State of Nevada
Executive Chamber

Robert List
Governor

April 13, 1981

Capital Complex
Carson City, Nevada 89710


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

Dear Ed:

Thank you for providing us with the draft "Sonoma-Gerlach Grazing Environmental Impact Statement."

The draft report has been referred to the appropriate state agencies for review. I appreciate your efforts to keep me informed of your agency's activities in Nevada.

Sincerely,


ROBERT LIST
Governor



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF MINES
2401 E STREET, NW.
WASHINGTON, D.C. 20241

May 13, 1981

DES 81-15

Memorandum

To: State Director, Nevada State Office, Bureau of Land Management,
Reno, Nevada

From: Director, Division of Mineral Land Assessment

Subject: Draft Sonoma-Gerlach Grazing Environmental Statement

Although the Bureau of Mines has no significant comment, we thank you
for the opportunity to review this draft statement.

James Paone
James Paone

RESPONSE TO HEARING COMMENTS

R-1 Issue: Suitability Criteria

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

R-2 Issue: Periods-of-Use

See response to Issue 6-3 in Final EIS.

R-3 Issue: Salt Desert Shrub

Expectations are that the salt desert shrub type will improve.
However, on those sites that show low vigor at this time, it is
expected that such sites will need longer periods of time to respond
than the long term may provide. In the DEIS refer to Chapter II,
page 2-2, Vegetation Communities and see also Figure 2-2, page 2-6,
the right hand portion of the figure. Also, refer to Chapter III,
page 3-8, Ecological Range Condition and Trend of Vegetation
Communities.

R-4 Issue: Slope Criteria

See response to Issue 7-4 in the Final EIS.

R-5 Issue: Monitoring Program

See discussion on CRMP and Monitoring in the Summary section in the
Final EIS.