

ea 7/9/79

IN REPLY REFER TO
4700
(N-027.8)



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
705 East Fourth Street
Winnemucca, Nevada 89445

July 9, 1979

Wild Horse Organized Assistance
Dawn Lappin
P.O. Box 555
Reno, NV 89504

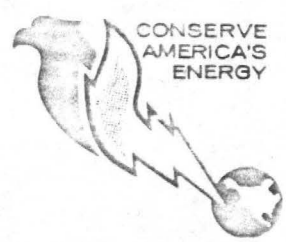
Dear Ms. Lappin:

The wild horse and burro numbers have reached extreme levels in the Winnemucca District. In response to this situation we have proposed two gathering plans for the Sonoma-Gerlach Resource Area:

1. Buffalo Hills Range - located approximately 100 miles due west of Winnemucca, Nevada.
2. Humboldt and West Humboldt Ranges - located approximately 30 miles southwest of Winnemucca, Nevada.

All of the available forage on the public lands in these two mountain ranges was adjudicated in the mid-60's for use in cattle operations and for wildlife. No AUM's were adjudicated for wild horses or burros. Because of this situation coupled with the increasing horse numbers, significant range damage is occurring in both ranges. This condition was exemplified during the 1977-1978 winter when approximately 300 wild horses died of starvation and stress in the Buffalo Hills Range. Perennial grasses are being grazed close to 100% yearly, and sagebrush and hopsage plants are being pawed out by horses in search of the protected grasses in these shrub understories. This is causing a significant decrease in the percentage of ground cover and is contributing to increased soil erosion problems, plus increased wildlife and livestock competition for forage.

We propose to reduce the total number of horses in the Buffalo Hills Range to an interim management level of 100 animals, and to remove all of the horses from the Humboldt Range. This will involve removing approximately 500 horses from the Buffalo Hills Range and approximately 900 horses from the Humboldts. A detailed inventory will be conducted prior to each roundup to determine the exact number of animals to be removed.



Save Energy and You Serve America!

Both roundups have been tentatively scheduled to begin this summer or fall, depending on the availability of funds, and will continue until all of the horses are gathered.

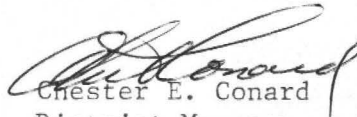
It is not anticipated that any harassment to the wildlife populations in either area will occur during the trapping operations.

In accordance with Section 14 of the Public Rangeland's Improvement Act of 1978 (P.L. 95-514), we invite your comments concerning the proposed gatherings.

If you require any further information please contact Brad Hines or Rodger Bryan at this office.

If you care to comment on the proposed action please do so by July 31, 1979.

Sincerely yours


Chester E. Conard
District Manager

Mr. Bob S
Intermountain
Post Office
Winnemucca

Dear Mr.

Review of
process in

Dawn
This paragraph is critical to
your argument to IBLA that NDOW
has been given unfair advantage in review
of the allot. evaluation for Buffalo Hills.
The paragraph admits that NDOW should
only comment on objectives and not conclusions
regarding those objectives. As you pointed
out in your brief to IBLA, NDOW's comments
covered the entire area of conclusions
regarding mgt. & if they can do ~~it~~
so should you be provided with
the opportunity to do it.

M.H.

evaluation

indicates you have two concerns.

The first concern relates to permittees and their consultants not being involved early on in the allotment evaluation process.

The Bureau's position is to seek close consultation, coordination, and cooperation with all interest groups involved in and affected by public land management issues. As you know, from your involvement in cooperative monitoring efforts on your clients' allotments, you often conduct monitoring efforts jointly with BLM personnel from the District Office, and have provided the Bureau with data in several cases.

Following this data collection we conduct evaluations to determine if existing management is meeting the multiple use objectives established by the Land Use Plan for an allotment, or if not, what changes in management are required.

The evaluation addresses only those multiple use objectives that are affected by livestock grazing on public lands. This requires a multi-disciplinary review of both the objectives and the data. One stage may occur before another, but be assured I am requiring appropriate coordination before any action is taken. The permittee will be heavily involved in this process.

Your second concern related to the Bureau submitting the evaluations to "...outside entities, specifically the Nevada Department of Wildlife...(when) permittees still have not been allowed any participation in the evaluation process whatsoever."

As discussed above, these allotment evaluations relate to attainment of multiple use objectives that may be impacted by livestock grazing on public lands. Prior to a conclusion on wildlife objectives, consultation with the Nevada Department of Wildlife on data relevant to the evaluation as well as

Mr. Bob Schweigert
Intermountain Range Consultants
Post Office Box 1033
Winnemucca, NV 89445

AUG 12 1988

Dear Mr. Schweigert:

Review of your letter dated, June 27, 1988, concerning the allotment evaluation process underway in the Winnemucca District indicates you have two concerns.

The first concern relates to permittees and their consultants not being involved early on in the allotment evaluation process.

The Bureau's position is to seek close consultation, coordination, and cooperation with all interest groups involved in and affected by public land management issues. As you know, from your involvement in cooperative monitoring efforts on your clients' allotments, you often conduct monitoring efforts jointly with BLM personnel from the District Office, and have provided the Bureau with data in several cases.

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As discussed above, these allotment evaluations relate to attainment of multiple use objectives that may be impacted by livestock grazing on public lands. Prior to a conclusion on wildlife objectives, consultation with the Nevada Department of Wildlife on data relevant to the evaluation as well as

the Department's specific population data is required. Be assured that there is no intent to circumvent or preclude the timely involvement of the livestock permittee in the allotment evaluation process.

With this understanding hopefully you will reconsider your advisement of clients to not share monitoring data with the Winnemucca District Office. Mutual cooperation is surely in the best interests of your clients and our shared commitment to sound land management decisions.

Sincerely,

Sgd. Edward F. Spang

Edward F. Spang
State Director, Nevada

cc: District Manager, Winnemucca
Nevada Garvey Ranches
Circle A Ranches
EK Ranches
Bob Thomas
DeLong Ranches, Inc.
Barnen Cattle Co.
Roy Shurtz

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WINNEMUCCA, NV 89445

RT. 2, BOX 2797
HERMISTON, OR 97138
(503) 867-8073

June 27, 1988

Ed Spang, State Director
Bureau of Land Management
P.O. Box 12,000
Reno, Nevada 89520

Dear Mr. Spang:

We have previously stated our concerns regarding the ongoing allotment evaluations being conducted by the Bureau of Land Management in Nevada. These concerns included the fact that permittees and their consultants are not being included in the evaluation process early in the procedure, nor to the extent which would be most advantageous to the Bureau's process.

We have repeatedly requested early consultation in the evaluation process in the several allotments on which Intermountain is conducting range monitoring. We have been told that following evaluation by the local range conservationist, the district range staff, and, at least in initial evaluations, the Nevada State Office staff, we would be allowed our "consultation" in the allotment analysis.

This is, as I have stated in previous letters, a reversal of the natural process of evaluation, since it is more logical to start with the consultation of those permittees and their employees or contractors who have the most knowledge of the allotment, and proceed to those who know less as the process continues. I have expressed my concerns about the "ink being dry" on the evaluations before the permittees are allowed their input, and will simply reiterate that concern at this time.

Of far greater concern at this time is information we have obtained from the Winnemucca District to the effect that you have instructed the districts to submit, or your staff is submitting, to outside entities, specifically the Nevada Department of Wildlife, your evaluations following review by your staff. At this point, the permittees still have not been allowed any participation in the evaluation process whatsoever.

The Winnemucca District is currently involved in having range cons, most of whom have not even been on the allotments they are evaluating, writing evaluations which are then evaluated and revised by range staff who almost assuredly are unfamiliar with the allotments, with further input by State Office staff who would be hard-pressed to find the allotments, and now apparently further input by NDCW, who have their own motives and motivations in any evaluation.


It is apparent to us that the Bureau is treading the same path it attempted to follow after the 1978 Range Survey and data input from nearly everyone except those most intimate with the allotments and the grazing of the allotments.

If any allotment evaluations have left the confines of the Bureau for input or evaluation by outside entities, we expect the Bureau to give like consideration to the permittees at the same time. Such an approach is only fair and equitable to the people most involved and most affected by the evaluations.

Intermountain is advising all of our clients to provide no more monitoring data to the Bureau until such time as we are also allowed input to the evaluations themselves. Monitoring data is not always self-explanatory, and rather than risk the Bureau's misinterpretation or misapplication of data without opportunity for explanation, we believe the data is better retained until the consultation "phase" of the allotment evaluations.

I will appreciate your response.

Sincerely yours,


Bob Schweigert

cc:

Scott Billing
Nevada Garvey Ranches
Circle A Ranches
EK Ranches
Bob Thomas
DeLong Ranches, Inc.
Barnes Cattle Co.
Roy Shurtz