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Paradise-Denio Grazing
Environmental Impact Statement

Documentation
of the
Scoping Process

June 1980

Prepared by
U.S Department of The Interior
Bureau of Land Management
Winnemucca District Office
Winnemucca, Nevada

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BACKGROUND AND NEED FOR SCOPING

Final regulations implementing the National Environmental Policy Act (NEPA), Part 1500, provide that there shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. The regulations direct that this process will be termed scoping and that, as soon as practicable after its decision to prepare an environmental impact statement (EIS), the lead agency shall publish a notice of intent in the Federal Register.

The regulations further direct that the lead agency (Bureau of Land Management--BLM) shall invite the participation of affected Federal, State and local agencies, any affected Indian tribe, and interested persons. The BLM will also determine the scope and significant issues to be analyzed in depth in the EIS. Issues which are not significant or which have been covered by prior environmental review will be identified and eliminated.

Information is gathered in the course of scoping meetings or from direct contact with interested groups, agencies and individuals by resource specialists and team members in the course of research. Written comments are also received as a result of news releases and notices in the Federal Register.

Information gathered through the scoping process is then integrated with existing resource information in preparation of the EIS. The purpose of scoping is to encourage public input, emphasize the significant issues to be addressed, and to reduce the length of the environmental impact statement by eliminating unnecessary information about insignificant issues.

PUBLIC INVOLVEMENT ARRANGEMENTS

Summary of Contacts

Through the scoping process conducted over a nine-week period, February 7 to April 11, 1980, the Winnemucca District of the Bureau of Land Management contacted interested individuals, groups, and other governmental agencies concerning the preparation of the Paradise-Denio Grazing EIS. Initial notification of the scoping process was given in a "Notice of Intent" published in the Federal Register of February 7, 1980. Letters of invitation were sent to individuals, groups, and governmental agencies. A news release was issued to the local and State news media soliciting public input.

Two briefings were held, one with the Nevada State Clearinghouse to brief the State Government agencies, and one with the Congressional field representatives. Three public meetings were held, one with the Humboldt County Commissioners, one with the Humboldt County Planning Commission, and one with the general public.

Chronology of Events

<u>Date</u>	<u>Action</u>	<u>Target Group</u>
August 1978	Inventories Completed	
August 1978	Consultation with Users	Interested Public
August 1979	Unit Resource Analysis completed	
September 1979	Management Framework Plan Step I completed	
January 1980	Management Framework Plan Step II completed	
February 7, 1980	Notice of Intent Published in <u>Federal Register</u>	Interested Public
March 4, 1980	Letter of Invitation (to the Public) to participate in Scoping Process	Paradise-Denio EIS mailing list
March 4, 1980	Issued News Release of Scoping Process	Local and State Media
March 4, 1980	Formal Meeting with Nevada State Clearinghouse	Nevada State Government
March 6, 1980	Briefing for Humboldt County Commissioners and other Government entities	Humboldt County Government
March 10, 1980	Briefing for Congressional Field Representatives	Congressional interests
March 19, 1980	Public Meeting	Interested Public

<u>Date</u>	<u>Action</u>	<u>Target</u>
March 24-28, 1980	Consultation with interested individuals and/or agencies	Interested Public
April 11, 1980	Deadline for comments on Scoping Process	Interested Public
April 24, 1980	Humboldt County Planning Commission	Humboldt County Government
December 12, 1980- February 9, 1981	Public Review of Draft EIS	Interested Public
June, 1981	Final EIS available	Interested Public
December, 1982	Management Framework Plan Step III	Interested Public
Spring, 1982	Decisions Issued	Interested Public

Comments Received, Issues Identified and Response to Comments and Issues

During the Paradise-Denio Grazing EIS scoping process, 23 written comments were received. Each comment has been included in this scoping document. Several of the comments were detailed and identified significant issues, others were statements of opinion or were general in nature, and others were only inquiries about the EIS and the scoping process.

Two briefings were held, one with the Nevada State Clearinghouse to brief the State Government agencies, and one with the Congressional field representatives. Three additional public meetings were held, one with the Humboldt County Commissioners, one with the Humboldt County Planning Commission, and one with the general public. Written comments were received from all meetings except for the Congressional briefing.

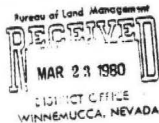
The EIS will analyze the impacts of the proposed action and alternatives on all resource uses. Only those issues determined to be significantly impacted will be documented in the EIS.

The following section contains a copy of each public contact received. They are numbered chronologically. Responses to comments and issues are given the same number and follow each contact.

Log of Official Comments on Scoping Process for Paradise-Denio
Environmental Impact Statement

No.	Date Received	Agency, Organization, or Individual
1.	3/23/80	Lee Nelson, Denio, NV
2.	4/10/80	Pinson Ranch, Golconda, NV
3.	4/5/80	American Horse Protection Association, Inc., Washington, D.C.
4.	4/3/80	Sierra Club, Toiyabe Chapter, Reno, NV
5.	3/28/80	Animal Protection Institute of America, Sacramento, CA
6.	4/10/80	Robert R. Hager, Salt Lake City, Utah
7.	4/10/80	Ninety-Six Ranch, Paradise Valley, NV
8.	3/31/80	DeLong Ranches, Inc., Winnemucca, NV
9.	4/8/80	Nevada First Corporation, Winnemucca, NV
10.	3/12/80	U.S. Department of Agriculture, Reno, NV
11.	3/11/80	University of Nevada, College of Agriculture, Reno, NV
12.	4/28/80	Nevada Cattleman's Association, Elko, NV
13.	4/11/80	Matt Morris, Director, Humboldt County Regional Planning Commission, Winnemucca, NV
14.	4/7/80	U.S.D.I., Heritage Conservation & Recreation Service, San Francisco, CA
15.	5/9/80	Joseph L. Gough, Chairman, Humboldt County Regional Planning Commission, Winnemucca, NV
16.	4/4/80	Julian C. Smith, Jr., Carson City, NV
17.	4/12/80	State Clearinghouse, Carson City, NV
18.	4/8/80	Committee for the Emigrant Trail National Monument, Palo Alto, CA
19.	4/7/80	Nevada Mining Association, Vic Botts, First Vice President, McDermitt, NV

No.	Date Received	Agency, Organization, or Individual
20.	3/20/80	Sierra Pacific Power Company, Reno, NV
21.	3/28/80	U.S.D.I., Bureau of Mines, Spokane, WA
22.	3/13/80	Milchem, Battle Mountain, NV
23.	3/14/80	Chevron Resources Company, San Francisco, CA



Mar. 19, 1980

T. W. Nelson, Sr.
Bureau of Land Management
District Manager - Winnemucca
705 East Fourth Street
Winnemucca, Nev. 89445

Dear Sir:

Thank you for distributing the BLM brochure "Management Framework Plan Step II".

Due to business at home, I will be unable to attend the evening meeting, scheduled March 19, at Nixon Hall, Winnemucca.

I would like to pass on to you my views regarding Step II. Also, I have some questions that I am sure you can answer.

I am a native of Nevada. My childhood and nearly all of my adult life has been in this state of ours. For eighty years, I have watched Nevada's growth and development. I am proud of what I see. And in my heart I want the best for this wonderful free country.

As a governmental agency, BLM, a land management arm for the people, is best equipped to direct responsible environmental preservation. You and your staff have the facilities at your disposal. We, the people, the residents who earn our keep from the Nevada lands, must rely on the good judgment of BLM. We do not have the time nor resources. And often it is difficult to keep abreast of the abundant proposals prepared by your busy staff. I am sure you can relate to this problem.

Now, I have some questions. I am an active miner and prospector. Under the heading "Minerals" you list four areas where BLM recognizes the mineral potential. Is this all of the mineralized land in the Denio-Paradise Valley area that you recognize? What, I ask, would you do to protect my interest in an area not mentioned?

My second question is part of the first. Protecting water shed, wild life, and cultural resources is a commendable task for any developed society. But would these same conservation goals tie my hands? Would I not develop mining lands, say in the Pueblo (Continental Lake) or Pine Forest or Wilder ranges? Do you mean, by the listing of Jackson, Eugene, and other ranges, that all areas of these ranges are under protective conservation, prohibiting mining development? I know of many areas outside of your mineralized zones that are rich in ores. Geologist may not know of them. Time after time, the "ignorant" prospector has found a bonanza under the skeptical nose of the "educated eye".

The third question is in regard to the five mile buffer zone of the Applegate - Lassen Emigrant Trail. Preserving this historic highway depicting monumental strength, endurance, and tenacity of the pioneers is of course necessary. However, five miles, I presume two and a half on either side, is a bit excessive don't you think? In your proposal of the buffer, would you exclude mining rights? It seems to me that a few hundred yards would be adequate to preserve the historic trail.

It is difficult for a man to fathom, to understand the vastness of a million acres. I have spent a life time, working to hang on to just a few. We tend to toss numbers of acres around like a child tossing sand in the wind. One acre is precious. A million acres is a million times more precious - think of it!

We who rely on this land for a living, so that we may pay our taxes and educate our children, are very concerned about too much governmental control over the use of our public lands. Please, let us not tie the hands of the Nevadans for the sake of governmental projects. Let us not create unneeded reclamation and wild life protection. I do not see gross neglect. And with the service of your agency, we shall not see it in the future. However, let's not pretend that it is there when it is not. I am thinking now of the proposal recently made public, regarding the fencing in of water holes, springs, and pools for the protection of wild life. Certainly the animals will have a chuckle over this.

Under Planning, in the MFP Step II brochure, you write that your staff have gathered inventory data on each resource. Would you please be a little more specific, what on earth would inventory refer to? May I make a suggestion. You are communicating to just "plain folks" in your district. We are not intune with departmental jargon.

I thank you for the opportunity to express my views. I hope all people will always have that right. Your attention to my questions will be appreciated.

Respectfully yours,

Lee Nelson
Lee Nelson

cc. Congressman
Jim Santini



United States Department of the Interior

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

April 21, 1980

Lee Nelson
P.O. Box 16
Denio, NV 89404

Dear Mr. Nelson

Thank you for your letter concerning our Management Framework Plan Step II. Your concerns about minerals on our district will be considered in any land use decisions we make. The District Manager's decisions concerning this land use plan are scheduled to be made in December of 1981.

I would also like to answer the questions you asked in your letter. We realize that there are minerals located in more than the four areas listed in our brochure (Jackson, Eugene, Osgood, and Montana Mountains). These mountain ranges contain minerals that have been listed as being of strategic importance. We feel that keeping the lands containing these minerals free from any decisions that would hinder mineral development is in the best interest of the United States. Mineral development on the rest of the district will be allowed as it has in the past.

The five-mile buffer strip along the Applegate-Lassen Historic Trail will be in force only until the area is studied and it is determined whether or not this area can be leased for geothermal development without damage to the trail. Other mineral development will be handled the same as it has been in the past. The 1972 mining law is still the law under which we operate.

Gathering inventory data simply means going into an area and seeing what is there. For instance wildlife inventory data simply means what wildlife animals can be found in an area. There may be deer, antelope, sage grouse, rabbits, etc.

I hope that I have answered your questions. Please feel free to call on me at any time.

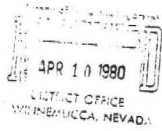
Sincerely yours,

Vaden G. Stickley
Acting District Manager



Save Energy and You Serve America!

P.O. Box 15
Golconda, WY 82414
April 3, 1980



Bureau of Land Management
District Manager, Winnemucca District Office
206 East Fourth Street
Winnemucca, WY 82415

Mr. Harkenrider:

We, the undersigned, who represent the Pinson Ranch, would like to officially air our comments on your major recommendations in conjunction with the Management Framework Plan Step II.

In general, we find your recommendations, with exceptions, to be basically sound in their intent. However, we feel certain specific recommendations to be totally irresponsible and deplorable in their intent and subsequent effect.

These specific recommendations are:

Minerals. 1. Make no land use decisions that would interfere with potential mineral development in the following areas: Jackson, Bureau, Teton, and Montana Mountains. Limit the size of any withdrawal to what is absolutely necessary to protect the values requiring the withdrawal.

Minerals. 4a. Make no land use decisions that would interfere with potential oil and gas or geothermal development on public lands classified as prospectively valuable for the above resources.

Comment. What basis is there in selectively "allowing" one segment of the multiple use concept, which is basically destructive in nature and non-renewable, to develop without the same constraints that are applied to the other multiple uses? This strikes us as a blatant abuse of proper resource management and gives credence to the commonly-held theory of selective discrimination and special-interest accommodation by the BLM.

Mr. Harkenrider
Page Two
April 3, 1980

Wild Horses and Burros. Maintain wild horses on 134,000 acres of public land in the Cwyhee spring range and remove wild horses from the remainder of the resource area.

Comment. This is a grand idea, but obviously unattainable considering the past failures of the BLM in this area and unrealistic, given the current access to federal funds.

Range Management. 7. Increase existing allocatable livestock permits by the following artificial methods:

- a. Seeding approximately 131,590 acres
- b. Controlling sagebrush on approximately 144,178 acres
- c. Developing and maintaining waters.

Comment. We feel this program is vastly below the public need. In our particular area, we have not been scheduled for any range improvement under this program, and we feel that is regrettable.

Range Management. 8. Implement an ear tagging program. Ear tags are used to facilitate range use supervision.

Comment. As we already have a sufficient identification and are in an individual allotment program would cause unnecessary expense to implement and maintain.

Range Management. 10. Eliminate staggered or pyramid licenses because of the difficulty of administering.

Comment. The simplest method or most convenient to the BLM is not necessarily realistically implemented on a practical level. Certain concerns for the time-honored methods of each rancher's individual operation should certainly be considered. Ease of administration by the BLM should not be paramount to the workability of any given operation.

Finally, our major opposition is to your specific recommendation that the allocation for livestock AUMs in the Paradise-Denio Resource Area be reduced on an average of 50%. This recommendation, we feel, is totally irresponsible and reprehensible coming from a government official in charge of improving resource management. The end result of such a recommendation would be disastrous to our personal operation.

Mr. Harkenrider
Page Three
April 3, 1980

A 50% reduction in AUMs would force a 50% reduction in our ranch income. Needless to say, this would put our ranching operation in an economically-unprofitable position. This recommended situation would effectively eliminate, through sheer economics, many of the present day cow-calf operations in the Paradise-Denio Resource Area. Our present day management program is one that has been developed over the past 92 years by the same family using first-hand knowledge and the experience gained through trial and error. Our success and continued survival through all forms of hardships should speak for itself.

Basically, our response is an emotional one as it is obvious to us that your recommendations are not rational and are deleterious in their intent and affect.

Mr. Harkenrider, your recommendations are entirely incongruent with the ethics of the rancher, and are abhorrent in theory, and insufferable in practice. Coming from a civil servant, these recommendations smooch of pomposity and the insidious abuse of an administrative office.

Sincerely,

PINSON RANCH

By *[Signature]*
[Signature]
[Signature]
[Signature]

PR/dsc



United States Department of the Interior

IN REPLY REFER TO
1792
(N-022)

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

April 22, 1980

Pinson Ranch
P.O. Box 15
Golconda, WY 89414

Dear Mr. & Mrs. Christison and family:

Thank you for your comments concerning the recommendations in the Management Framework Plan Step II for the Paradise-Denio Resource Area. I would like to assure you that your comments will be considered in any land use decisions that are made by the Winnemucca District. The decisions for the Paradise-Denio Resource Area are scheduled to be made in December of 1981. The area manager's recommendations are the result of a rather lengthy process. Each resource specialist on the district gathers as much information as he can about his particular resource. He then gives to the area manager a set of selfish recommendations that he would like to see implemented for his resource. The area manager then takes all of these selfish recommendations and attempts to resolve the conflicts between them. The area manager's Step II recommendations is the result of this conflict analysis.

If you wish I will ask the area manager to discuss his specific recommendations with you.

Sincerely yours,

Vaden G. Stickley
Acting District Manager

LAW OFFICES
McCANDLESS & BARRETT
 Tenen Plaza
 1707 H Street, N.W.
 WASHINGTON, D. C. 20006

ROBERT C. McCANDLESS
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 DANIEL A. SIEGEL

202 223-8440
 CABLE "BOONER"
 NEW YORK OFFICE
 425 PARK AVENUE
 NEW YORK, NEW YORK 10022

April 4, 1980

William J. Harkenrider, Jr.
 Area Manager
 U.S. Bureau of Land Management
 705 East Fourth Street
 Winnemucca, Nevada 89445

Dear Mr. Harkenrider:

We are in receipt of the Management Framework Plan Step II for the Paradise-Denio Resource Area.

We are pleased to note that the wild horse management plan has been altered to allow some horses to remain in the Owyhee spring range. While we are encouraged by this step, I must remind you of the pending litigation regarding the Paradise-Denio Resource Area. This case, American Horse Protection Association, Inc. v. Andrus, is awaiting resolution of several critical legal issues by the United States District Court in Nevada. Therefore, we request that any proposed action be suspended until the litigation is concluded.

Very truly yours,
 McCANDLESS & BARRETT

By *Joseph E. Schuler*
 Russell J. Gaspar
 Attorneys for American Horse
 Protection Association, Inc.

RJG/ll
 cc: Joan Blue



United States Department of the Interior

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

IN REPLY REFER TO
 1792
 (N-022)

April 21, 1980

Russell J. Gaspar
 McCandless & Barrett
 Tenen Plaza
 1707 H Street, N.W.
 Washington, D.C. 20006

Dear Mr. Gaspar:

I would like to thank you for your comments concerning our Management Framework Plan for the Paradise-Denio Resource Area. Your concerns about wild horse management on our district will be considered in any land use decisions we make. The district manager's decisions concerning this land use plan are scheduled to be made in December of 1981.

I would also like to assure you that we are aware of the pending litigation concerning the Paradise-Denio Resource Area and that it will be given full consideration prior to implementation of any land use plans.

Sincerely yours,

Vaden G. Stickley
 Acting District Manager



SIERRA CLUB

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

April 1, 1980

William J. Harkenrider, Jr.
 Area Manager
 Bureau of Land Management
 705 East Fourth St.
 Winnemucca, Nevada 89445

Dear Manager Harkenrider,

Thank you for sending the brochure on the MFP II for the Paradise-Denio Resource Area. We regret we were unable to send a representative to the March meeting, but most Sierra Club volunteers are not available for meetings in the middle of the week, so far from Reno.

We would like to make several comments on the MFP II. First, we would like to commend the presentation of the information in an attractive, readable format. Second, we agree with most of the recommendations presented in the brochure. One exception was the apparent commitment to mineral and energy development in Minerals 1 and 4a with no consideration given to multiple use. In Watershed we think mining disturbance, especially that caused by open pit mining and strip-mining should also be evaluated for rehabilitation. In Wildlife, we definitely support road closure in the Pine Forest Area and other areas suffering from extensive 4X4 damage. We support the Wilderness recommendation and hope your activities will not be limited to signing WSA boundaries.

Third, we do not have sufficient information on the condition of the range in the Paradise-Denio Area to evaluate the Range Management and Wild Horse and Burro recommendations. We did not notice specific recommendations for reductions in grazing allotments in order to improve range condition and forage production. We also cannot support the 144,178 acre sagebrush control and 131,590 acre seeding without more information on range conditions and AUM adjustments.

Fourth, there is no recreation resource listed in the brochure. Why was recreation omitted? Is wilderness the only recreation activity anticipated by the Winnemucca District?

Thank you for the opportunity to comment on the MFP II.

Sincerely,

Rose Strickland
 To conserve the area and protect the natural mountain scene

Bureau of Land Management
RECEIVED
 APR 03 1980
 DISTRICT OFFICE
 WINNEMUCCA, NEVADA



United States Department of the Interior

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

IN REPLY REFER TO
 1792
 (N-022)

April 22, 1980

Rose Strickland
 Toiyabe Chapter Sierra Club
 P.O. Box 8096 University Station
 Reno, NV 89507

Dear Ms. Strickland:

Thank you for your comments concerning the MFP II for the Paradise-Denio Resource Area. The brochure was intended to provide only the major recommendations for each resource and to be used as a supplement to the public meetings. The recreation resource was inadvertently omitted from the brochure but the recommendations concerning this resource were addressed in the public meeting. The recreation recommendations are too extensive to address in this letter but if you would like more information on them please feel free to contact me at any time.

The recommendations for the land use plan recommend roughly a 50% reduction in livestock AUMs for the area from a total of 225,815 AUMs to 100,861 AUMs. The range of these adjustments are from slight increases on five allotments to 100% reductions on several others. Also we are recommending that AUMs be allocated to wild horses and wildlife. These resources were not allocated any AUMs or very few AUMs in the past.

If you would like to discuss this plan further please feel free to contact me at any time.

Sincerely yours,

Vaden G. Stickley
 Acting District Manager



ANIMAL PROTECTION INSTITUTE OF AMERICA
1924 South Leno Park Drive
P.O. Box 22005
Sacramento, CA 95822
(916) 422-1741

March 25, 1980

Mr. Brad Hines
Area Manager
Winnemucca District Office
705 East South Street
Winnemucca, NV 89445

Dear Mr. Hines:

Thank you for your letter to Ted Grail of March 18, 1980. I have reviewed your Management Framework Plan Step II and, while I agree with certain proposals, I still have a number of doubts and objections.

Your proposed allocations for available forage has disproportionate values for wildlife and wild horses. At least one half of the proposed allocation should be for the latter two. I would suggest the following breakup:

50,835 AUM's--Livestock
30,467 AUM's--Wild horses
30,467 AUM's--Wildlife
100 AUM's--Recreation.

Your proposal to remove wild horses from all areas in the Paradise-Denio Resource Area except for 398,000 acres in the Owyhee Spring Range makes it appear that you are catering to the wishes of stockmen. Wild horses as wildlife should be provided for in all areas throughout your resource area; and a balance between the various multiple uses of the range should be established. If wild horses are to be established, they must be allowed to have a population which comes close to filling their niche or adaptive zone in the ecosystems. Wild horses can occupy many areas where neither the plant material or the terrain are suitable to livestock. They can graze coarser material and pass this through their digestive systems at a faster rate with their post-gastric digestive systems. The organic material of their feces aids the soils in building their humus content; and the undegraded seeds in their feces also aid in plant propagation on the range. Also, the nomadic, wide-ranging habits of horses disperse their grazing pressure over a large area.

Under your watershed recommendations, I would like to know how the use of prescribed burning to control big sagebrush will improve the desirable watershed. I realize

continued....

MEMBER
WORLD FEDERATION
FOR THE
PROTECTION OF ANIMALS
DORIS WHITFIELD

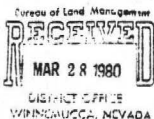
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Mr. Brad Hines

-2-

March 25, 1980

that grass and annual forbs would experience a resurgence after burning due to the release of minerals. However, I would suspect that the wind or rain would erode the exposed soils. And I doubt that grassland would remain with continued grazing pressure. Rather, sagebrush would again occupy the terrain, since the grass and forbs palatable to cattle or sheep would be grazed to as to greatly eliminate them from the ecosystem.

I question whether sheep-cattle conversion is always desirable. Certain areas are probably better suited for sheep, others for cattle. And there are probably many areas in your unit where neither belongs.

Under your Wildlife category, I strongly favor your intention to modify 81.75 miles of existing fences to allow freedom of passage to wildlife--and the same would apply to wild horses, which you fail to mention. I would recommend even more modification or even the elimination of fences which restrict the motions of wildlife. Fences often cause overgrazing by inhibiting the movements of grazing animals.

As for your Water category, I hope that water sources will, indeed, be available throughout the year for all forms of life. The fencing or sealing off of water and piping to ranches below springs does, in effect, kill wildlife and wild horses in the critical dry periods of the year. Cases of this have been reported from the Ely BLM district, Buck Mountain. Necessary legal steps should be taken to help keep springs open to all life throughout the year. And adequate inspection camps should assure that they are so maintained. But I doubt that this is possible under present state and federal laws, which allow those parties who own the water rights to cut off the use of their water by wildlife, wild horses, etc. Cases of this are found in many places: the Nut Range, ranges near Ely, and, I suspect, in ranges of your Paradise-Denio range.

No mention was made of trapping and provision for predatory animals. Trapping endangers golden eagles, foxes, mountain lions, bobcats, and many other forms of life. Studies show that an estimated 80% of wildlife caught in traps are species other than those sought. Trapping is bringing about the demise of many of those species most endangered in the state of Nevada, such as the Mountain Lion and the Golden Eagle. If possible it should be eliminated on public lands.

I would like to know what portion of your resource area is on slopes of greater than 45° and whether livestock grazing is going to continue on these slopes. Also, it would be a good thing to know the present state of the area as to erosion, successional trends, etc., to better appraise your recommendations. For this, a history of grazing use and vegetative patterns would be desirable.

Please inform me whether Livestock AUM allotments are being reduced over what they were in previous years.

I am very interested in wilderness areas and would appreciate having a map of these areas. I would like to make a visit to these proposed wilderness areas and perhaps do an aerial survey of the entire resource area.

continued.....

Mr. Brad Hines

-3-

March 25, 1980

Please call me when any important meetings or wild horse roundups are going to take place. I would appreciate being included in your planning procedure. (I hold a M.S. in biology from UNR and have worked for years as a wildlife biologist and ecologist.)

Sincerely yours

Craig C. Downer
Research Services

CCD/ba

P.S. Sorry I missed the meeting last Wednesday, but I did not receive your letter, through no fault of your own, until this Monday.



United States Department of the Interior

IN REPLY REFER TO
1792
(N-022)

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

April 22, 1980

Craig C. Downer
Animal Protection Institute of America
P.O. Box 22505
Sacramento, CA 95822

Dear Mr. Downer:

Thank you for your comments concerning our Management Framework Plan Step II for the Paradise-Denio Resource Area. Your concerns will be taken into consideration when the land use decisions are made for the Paradise-Denio Resource Area. These decisions are scheduled to be made in December of 1981.

Our recommendation to maintain wild horses on the Owyhee Spring Range seems to be slightly misunderstood. We are proposing that all of the livestock be removed from the Owyhee Spring Range and the range reserved for wild horses.

Whenever an area is burned there will be a period of at least two years rest from livestock grazing in order to properly establish the vegetation.

Under the vegetation allocation which we propose grazing would not be allocated on areas where the slope is in excess of 45°. Grazing would also be eliminated in areas that are more than four miles from water and those areas that do not produce more than 25 pounds of forage per acre.

On the average area-wide livestock allocations under our recommendations would be reduced by 50% from 225,315 AUMs to 100,361 AUMs. The range of reductions on allotments would be from an increase on a few allotments to a 100% reduction on others.

We will be glad to keep you on our mailing list and you will be informed whenever meetings are held concerning land use plans, wild horse gatherings, or any other major actions.

Sincerely yours,

Vaden C. Stickley
Acting District Manager



April 4, 1980

District Manager
Bureau of Land Management
Winnemucca District Office
705 East Fourth Street
Winnemucca, Nevada

Dear District Manager:

As Acting Director for the Public Lands Legal Foundation, I would like to comment on the Paradise-Denio Area Manager's planning recommendations as set forth in the "Management Framework Plan Step II" brochure dated March, 1980. The Public Lands Legal Foundation (PLLF) is a non-profit, public-interest organization dedicated to the protection of public land users' rights consistent with traditional multiple use concepts of public land management. Members of PLLF use and enjoy the public lands in the twelve Western public land states and have used the Paradise-Denio area for grazing and recreational purposes since 1912.

PLLF hopes that the Bureau is not already committed to the proposals of the Area Manager as set forth in the MFP II brochure. Many citizens in the Paradise-Denio area, whose lifestyles and livelihoods depend upon reasonable BLM regulation, feel that they have been closed-out of the land use decision-making, and that the Area Manager has evidenced a total lack of concern for local and regional needs. PLLF would like to see the BLM begin to work with public land users in the area so that the land use decisions in the Paradise-Denio area will be made in the public interest.

If implemented, the Area Manager's recommendations would create: catastrophic local and regional economic dislocation; disastrous cultural consequences due to immediate, grave, substantial injury to America's cultural resources; cataclysmic environmental results due primarily to the loss of domestic livestock as a management tool useful for the manipulation of rangeland resource values; and calamitous fire control and pest control problems which could threaten grazing and recreational potential throughout the area. PLLF would like to see the

District Manager
Bureau of Land Management
April 4, 1980
Page 2

proposed wild horse area be established adjacent to a paved access road so that these beautiful creatures can be better viewed and enjoyed by the national public; an area adjacent to Interstate 80 would probably be best.

RANGE MANAGEMENT

PLLF has consulted with professional range scientists at major Universities in the Intermountain West and, based upon this consultation, recommends a thorough review of the range survey by an outside expert. It must be determined why, although there are less domestic livestock grazing in the resource area at this time than during the most recent previous range survey in the mid-1960's, the latest range survey resulted in such a drastic reduction in recommended grazing use. In the mid-1960 range survey, approximately 243,000 AUM's were determined to be available for grazing use, while, by comparison, the total recommended carrying capacity of the resource area is now recommended to be merely 120,000 AUM's. This is approximately a 50% reduction in proposed allocation, despite the fact that forage trends should be improving since the mid-1960's survey due to less intensive use in the area pursuant to BLM regulation.

Professional range scientists insist that the carrying capacity of the range cannot be accurately determined by the range survey methods used in the Winnemucca District. The only scientific way to determine the carrying capacity of the range is through monitoring of condition and trend of rangeland under present use and not through range surveys. Also, the Area Manager is mixing two completely different concepts: (1) proper use and (2) key species. It is predicted by range scientists that the result of this mixing of concepts and planning based on an inadequate data base will be unnecessary restrictions on livestock grazing.

Professional range scientists who are familiar with the effects of climate on the amount of vegetation produced on Nevada rangeland feels that the weather factor has not been adequately considered by the Area Manager. Range scientists at the University of Nevada-Reno conclude that the Bureau has failed to adequately take into consideration the effects of climate on the amount of rangeland vegetation.

District Manager
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The most important single recommendation, that of no livestock grazing in the Paradise-Denio area during the month of April, is not even set forth in the MFP II brochure. This concept of range management is regarded by professional range scientists as an unnecessary impediment to range utilization. The scientific utility of "no livestock grazing during April" was rejected by knowledgeable range scientists in Nevada more than thirty years ago. The physiological requirements of forage should be the determining factor of seasons of use, rather than administrative expediency. PLLF feels that it is dishonest to omit this critical recommendation from the MFP II brochure and recommends that henceforth the Area Manager disclose for public comment all land use recommendations, as required by law.

The BLM should be aggressively working to enhance the productivity of the public lands through on-the-ground range improvements and weather modification. PLLF feels that funds collected from grazing permittees should be put into on-the-ground improvements as expressly ordered by Congress. Congress took the BLM to task in 1978 for excessive "paper-shuffling" and other non-productive agency activity and ordered that the Bureau comply with the statutory formula which compels the expenditure of funds received for grazing fees for on-the-ground improvements in the district in which those grazing fees were collected. Range improvement techniques which should be used include brush removal, seedings, controlled burnings, and weather modification.

Local, Regional and National Economic Implications

The most notable impact of the proposed action is the drastic economic dislocations which are sure to result if the proposed reduction in grazing use is put into effect. Economists from the University of Nevada in Reno have identified a number of very serious negative implications to the local and regional economies. The grazing reductions would: increase unemployment by driving many ranchers into bankruptcy by creating non-economic ranching units; drive up the national rate of inflation in what President Carter has already identified as a dangerously inflationary climate; accelerate the distressing trend toward concentration in the Nevada ranching industry; increase but country's dependence upon foreign sources of

District Manager
Bureau of Land Management
April 4, 1980
Page 4

petroleum by forcing a shift to more Midwestern, energy-intensive production of grain-fed beef; provide a disincentive for any ranch operators to invest in range improvements due to the present tenure evidenced by such actions. In recognition of these considerations Congress passed the so-called McClure Amendment in 1979, which is a clear directive to the BLM that it should not be the policy of the Bureau to implement drastic grazing reductions, either through the FLPMA land use planning process or any other means.

Since the viability of desert ranches in Nevada is almost entirely dependent upon public land regulations, BLM decision-makers must consider the economics of ranch operations in the land use planning process. Economists have unanimously concluded that the Area Manager's recommendations would force many ranch operators into bankruptcy, with a consequent "rippling effect" of increased unemployment and bankruptcies in the local cities and towns. The effect on resale value of ranch base property would be devastating.

If the Area Manager's recommendations are put into effect, many ranch operators would be forced to sell their base properties at a loss, and, as Dr. Ruth Houghton of UNR noted, this would accelerate the trend of increased corporate ownership of ranches in Nevada. Dr. Houghton, an anthropologist whose report was based upon ten years of research and interviews of residents of Northern Nevada, stated: "There was a personal concern about the condition of the land, public and private, and it was felt that family-owned ranch grazing privileges were more carefully used. Those interviewed said, families have a sense of responsibility for the condition of the land that a speculator, big outside owner, or maybe a temporary resident BLM employee does not have." (P. 95)

PLLF feels that, while most corporate ranching operations respect BLM regulations and are concerned about the condition of the land, it is nonetheless not in the public interest to administratively hasten the trend toward concentration in the Western livestock industry. In any case, the potential for and implications of increased concentration in the Nevada livestock industry are factors which must be carefully analyzed before existing operators are forced out of business by BLM regulation.

District Manager
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Cultural Resources

One of the obvious negative implications of forcing ranching families out of the ranching business is the grave, irreparable injury which will result to one of America's unique sub-cultures. The diversity of cultures in our nation is one of the factors which makes this country a great place to live, and irreparable harm to the indigenous culture should not be taken lightly. NEPA, the Antiquities Act, and the BLM's own regulations prohibit actions which would wantonly destroy America's cultural resources. One of these protected cultural resources is clearly the western ranching family, and the BLM should comply with its own regulations in protecting the continued existence of this valuable cultural resource. These ranching families should not be forced into an economic situation in which they cannot survive.

National Inflationary Impact

President Carter has just recently announced new, drastic action designed to curb inflation. The public certainly has an interest in slowing down the inflation rate, particularly with respect to the price of consumer goods such as red meat. Many economists feel that excessive emphasis on the natural environment, along the lines of incessant reductions in livestock grazing on the public lands, is a luxury which our nation can no longer afford. Given the current inflationary climate, it is not in the public interest to implement administrative decisions which will unquestionably increase the rate of inflation and the price of consumer goods. In order to protect the public interest, PLLF recommends that the implications of the proposed grazing reductions on the inflation rate and on President Carter's price guidelines be fully assessed.

The National Energy Crisis and the Balance of Trade Deficit

Another important national economic consideration involves the use of energy in the production of red meat. Since grain-fed beef takes twenty-times as much energy to produce as does grass-fed beef, a reduction in the amount of grass-fed beef would result in the increased use of energy, especially the use of imported petroleum products. Every increase in the amount of petroleum imported weakens the dollar, fuels inflation, and

District Manager
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Page 6

increases our nation's dependence upon uncertain foreign sources of energy supply. President Carter has stated that energy conservation is of the highest priority and has asked all Americans to work together toward that goal.

Thus, consistent with President Carter's energy conservation objectives, it should be the policy of the Department of Interior to facilitate the production of range cattle, and not to unreasonably interfere with or destroy energy-efficient range cattle operations. Governmental policy should be to facilitate and encourage the energy-efficient, productive use of the public lands. It should not be the Bureau's policy to force range cattle operations into an economic situation in which they cannot survive.

ENVIRONMENTAL CONCERNS

By forcing ranch operators into bankruptcy, the BLM would lose its most effective land management tool--domestic livestock. Domestic livestock grazing use can be adjusted so as to maximize desired resource objectives. It is not realistic, however, to assume that livestock operators who are faced with reductions of forty to ninety percent will continue to operate at those reduced levels; such operations would not be economical. Thus, if the Bureau desires to retain management flexibility offered only by domestic livestock grazing, the economic viability of ranching units must be preserved.

PLLF feels that if livestock use is no longer practical as a result of BLM regulation, then cataclysmic environmental consequences will result. Fire control will be such a problem that wildlife, public health and safety, and property will be threatened. Studies also indicate that when livestock use is cancelled populations of pests such as insects and small mammals, which otherwise compete with livestock for available forage, quickly become unmanageable. These pests cannot be controlled as can livestock, and every indication is that, with an uncontrolled increase in their numbers, they would soon consume the forage previously used by livestock on the public lands and then move on to ravage vegetation produced on private lands.

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PLLF requests that, since a drastic reduction in livestock use is in effect a decision to have no livestock use, in-depth studies be conducted by range science departments of major universities to determine the environmental consequences of no livestock use of the public lands. PLLF predicts that fish and wildlife populations would be seriously reduced if no livestock grazing were allowed due to fire control and pest control problems, and that public health and safety and private property would be threatened for these same reasons.

WILD HORSES AND BURROS

The proposal to establish a wild horse range may be the best way to deal with the explosion in the wild horse population and the serious environmental degradation resulting from the BLM's present ineffective wild horse management program. PLLF does not feel, however, that most members of the public will be able to enjoy these lovely creatures if they are banished to the remote Owyhee desert area. The intent of the "Free Roaming Wild Horse and Burro Act" is to protect these animals so as to maximize public appreciation of their free-roaming nature. In this light, it would be in the public interest to create the wild horse range next to a paved, all-weather access road such as Interstate 80, where interstate travellers can more easily observe them.

PLLF feels that cancellation of any authorized livestock use for the reallocation of that use to wild horses should be done only in accordance with existing law. Any livestock grazing reductions for the establishment of wild horse areas must be "equitably apportioned" by law. In any budget requests for funding to establish a wild horse area, the BLM should include a request for severance damages to be paid to the affected permittees. The amount of severance damages should take into consideration the value of the base properties with and without the adjustment in authorized AUM's.

MINERALS

This nation is currently facing serious shortages in strategic minerals and deficient domestic production of oil and gas. In this light, the BLM should make no land use decisions which would interfere with potential mineral development or oil and gas development in any area.

District Manager
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WATER

The brochure describing the Area Manager's recommendations states that all water developments "will be established through either state water law or other appropriate direction (means)." PLLF feels that the BLM should not try to undo over one hundred years of federal-state relations in the Western water law area. The BLM should comply with state water law; there is no other "appropriate direction (means)." Interior Secretary Andrus has promised Western Governors that so-called "unreserved water rights" will not be asserted by the Department, and this promise should be kept.

RECREATIONAL ACCESS - BLUE LAKES

Finally, PLLF opposes the closure of the Blue Lakes access road due to the discriminatory impact that this action has on elderly and handicapped recreational users of the public lands. The BLM should not select to impose unique hardships on handicapped and elderly people who wish to continue to enjoy the only high-mountain lake accessible by road in Northern Nevada. This proposal to halt public use of the access road is a denial of equal protection under law to those persons who, due to physical inability to "hike-in," are discriminated against. It should be the policy of the Federal government to protect the rights of disadvantaged minorities such as the elderly and the handicapped, and not to administratively violate Constitutionally-protected rights.

CONCLUSION

PLLF is interested in and supportive of any practical plan to promote conservation of soil, wildlife, water and esthetic qualities in the Paradise-Deno area. Along these lines, the Bureau should comply with express Congressional mandate to reinvest fees collected for livestock grazing in on-the-ground improvements. Weather modification should also be studied and, if successful, implemented so as to increase productivity of the public lands.

PLLF finds the Area Manager's proposals deficient in specific data and analysis of realistic potential consequences. This is a vital, important subject with tremendous local, regional and

District Manager
Bureau of Land Management
April 4, 1980
Page 9

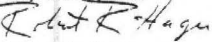
national ramifications which require more detailed analysis. PLLF would like to see the BLM take into consideration local and regional needs in the land use planning for the Paradise-Denio area. Not only do the Area Manager's recommendations threaten the vitality of the local and regional economy, but the effect of implementation of these proposals would also be to increase the national inflation rate and to worsen our nation's energy crisis by forcing increased dependence upon foreign sources of petroleum.

If the proposed livestock grazing reductions are put into effect, the following will also likely occur: America's rich diversity of cultures will be irreparably damaged; cataclysmic environmental degradation will result; fire control and pest control will be made impossible; and fish and wildlife resources will be severely damaged. Additionally, PLLF is acutely aware that the strictly factual imperatives generated by our current energy and balance-of-payments crises require promotion of energy-efficient, productive use of the public lands.

Given the magnitude and implications of land use planning in the Paradise-Denio area, outside experts should be consulted in order that a sound, practical plan be formulated for the area. Western land-grant universities would be a good source for many of these experts. An additional source of invaluable information is those who have lived and worked in the Paradise-Denio area for years.

PLLF would like to thank the District Manager for this opportunity to comment on the Area Manager's recommendations, and would be happy to assist the BLM in reformulating the subject recommendations so that they more accurately reflect the public interest.

Very truly yours,



Robert R. Hager
Chief Legal Officer/Acting Director
Public Lands Legal Foundation

RRH:llp

District Manager
Bureau of Land Management
April 4, 1980
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cc: Honorable Howard W. Cannon
Honorable Paul Laxalt
Honorable James Santini
Honorable Orin Hatch
Honorable James McClure
Harry Swainston, Esq.
Ed Spang
Frank Gregg
William Harkenrider
Robert Neary



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 22, 1980

Robert R. Hager
839 E. So. Temple #107
Salt Lake City, UT 84102

Dear Mr. Hager:

Thank you for your comments concerning the Paradise-Denio Management Framework Plan Step II. Your concerns will be considered in any land use decisions that are made by this district. The district manager's land use decisions for the Paradise-Denio Resource Area are scheduled to be made in December of 1981.

As you know the University of Nevada Reno has recently completed an economic study of Humboldt County. We will use the data gathered by the university as the basis for any economic analysis we do. A copy of the economic analysis is enclosed. Also we have recently become involved in the concept of Coordinated Resource Planning. The Winnemucca District supports this concept and is interested in working through this process to arrive at the best plans possible.

The area manager's recommendations are the result of a rather lengthy process. Each resource specialist on the district gathers as much information as he can about his particular resource. He then gives to the area manager a set of selfish recommendations that he would like to see implemented for his resource. The area manager then takes all of these selfish recommendations and attempts to resolve the conflicts between them. The area manager's Step II recommendations is the result of this conflict analysis.

If you wish I will ask the area manager to discuss his specific recommendations with you.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



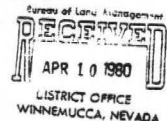
Established 1864

NINETY - SIX RANCH

(702) 578-3541

Commercial Cattle
Paradise Valley, Nevada 89425 April 7, 1980

Vaden G. Stickley
Bureau of Land Management
705 East Fourth Street
Winnemucca, NV 89445



Dear Mr. Stickley,

I wish to suggest the following alternatives to the Paradise-Denio MFP Step II scoping process and request that they be given consideration.

1. Adopt a positive, rather than negative approach, to livestock grazing. Accomplish this by determining proper stocking rates by starting with present numbers. Then through the use of trend and condition studies, actual use figures, and sound basic resource management, arrive at the proper stocking rate. The BLM seems to promote the idea that all problems can be corrected by reducing livestock numbers. This is basically unsound. Lack of knowledge and ability, or unwillingness to properly manage the resource is usually the problem. The positive approach would accomplish such toward stabilizing the livestock industry dependent upon the Federal range. Do this, rather than devastating long established operations through reductions with the nebulous promise of range improvement in the future.
2. Base range management on key species that are capable of withstanding sustained use, rather than putting so much emphasis on trying to maintain or regain a pristine condition. Many non-pristine and introduced species are capable of such more sustained use than are pristine species.
3. When classifying land for disposal for agricultural or other uses, make provision for rights-of-ways for livestock operations based on their traditional use and/or use allocated to them in previous AMPs and range agreements.
4. If range survey crew personnel, or any personnel, involved in preparation of EISs, make errors that ultimately result in loss or damage to anyone, those individuals should be held personally

2.

liable for the loss or damage. A person in business for himself is liable for mistakes that damage others and this should also apply to government employees. They would then be "living in the real world".

At this time I am also resubmitting two other letters that were submitted earlier in the EIS process. The first, addressed to Jerry Smith, dated August 27, 1979, outlines suggestions that I feel could improve range management and increase forage production on the Ninety-Six Ranch grazing allotment.

The second letter, addressed to Bill Harkenrider, dated September 10, 1979, states my views and opinions of the range survey made on the Ninety-Six Ranch grazing allotment.

I would like these two letters be made a permanent record of the Ninety-Six Ranch MFP Step II scoping process and be considered in all decision concerning this ranch.

Sincerely,

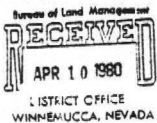
Leslie J. Stewart
Leslie J. Stewart

cc: Bill Harkenrider
Bureau of Land Management
Winnemucca, NV 89445

Ed Spang, State Director
Bureau of Land Management
Reno, Nevada 89520

Senator Paul Laxalt
326 Russell Senate Office Bldg.
Washington, D. C. 20510

Representative Jim Santini
1408 Longworth Office Bldg.
Washington, D. C. 20515



Mr. Bill Harkenrider, EIS Coordinator
Paradise-Denio EIS
Bureau of Land Management
Winnemucca, Nevada

Dear Mr. Harkenrider:

I request that this letter be made a part of the Paradise-Denio EIS record, file of the Ninety-Six Ranch (formerly the Wm. Hook Farming Co.) and be considered by you in all present and future decisions in connection with the EIS for this ranch.

I wish to present the following observations on the figures and information given us on August 27, 1979 by Mr. Jerry Smith, which shows a tentative reduction in AUMs of approximately 66% for the Ninety-Six Ranch:

1. The entire area was rated on the basis of summer use. Refer to the grazing permits issued since the inception of the Taylor Act and they will show that they have always been for spring use.
 - (a) The single exception to this is a small number, 30-40 head, that are licensed for summer use during July and August. This being due to the practical fact that a small number of cattle may be missed in gathering or may drift back to the BLM range. This small summer use is carried to avoid trespass.
2. The area does not physically, vegetation or climatically, lend itself to summer use. There is no water, if not complete, lack of water in the area in the summer. The feed is so dry that cattle cannot thrive in the summer. They have much better forage on the Forest Service range at this time to the year.
3. The area is under a management plan. The plan recognizes that the area is spring range and the purpose of the plan is to meet the needs of the plant while still allowing for spring use. This is accomplished by allowing certain areas to fully mature in various years in accordance with good range management and as set forth by a modified Hormay system of grazing.
4. Annual plants cannot be hurt by spring grazing due to the very fact that they are annuals. Spring is the only time they can contribute to the grazing capacity of a range and by grazing in the spring take a certain amount of pressure off the perennials. If not grazed early they contribute nothing to the range on this allotment and this places an even greater degree of use on the perennials.
5. The ranch's summer range is on the Humboldt National Forest, Santa Rosa Division. The season is June 11 - October 2.

2.

...is conducted under an allotment plan... to meet the needs of the plant, to coordinate with the BLM plan and the operation of the ranch. To change the BLM area to summer use, with greatly reduced numbers, will completely disrupt the operational plan of the ranch and Forest Service system. Further, it will probably endanger the Forest Service permit due to decreased numbers and identical season of use. It is not practical, or even possible, to use the BLM and Forest at the same time of the year.

6. The Taylor Act provides for, "stopping injury to the public grazing lands...provide for improvement and development, to stabilize the livestock industry dependent upon the public range." To the best of my knowledge, the Taylor Act has not been repealed and while there are other acts concerning public land in the west, the objectives of the Taylor Act should still be considered. The objective of stabilizing the livestock industry should still have equal status with the other objectives.

7. It is incomprehensible to me how a range could be grazed for 75-100 years, be 66% overallocated, as your reports indicate, and not to have had the cattle starve to death many years ago.

I submit the following summary:

- A. That the area is not summer range and should be reallocated for spring use.
- B. That the operational stability of the Ninety-Six Ranch and the use of the Forest Service permit cannot be accomplished if your report is not changed.
- C. That the range survey must have mistakes and discrepancies.
- D. That I am not in agreement with your range survey, season of use, nor your findings of available AUMs.

Yours,

Leslie J. Stewart
Leslie J. Stewart
Marie M. Stewart
Marie M. Stewart
Fred W. Stewart
Fred W. Stewart

cc: Ed Spang, State Director



United States Department of the Interior

IN REPLY REFER TO
1792
(N-022)

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

April 22, 1980

Leslie J. Stewart
Ninety-Six Ranch
P.O. Box 14
Paradise Valley, NV 89426

Dear Mr. Stewart:

Thank you for your comments concerning the Paradise-Denio Environmental Impact Statement scoping process. The two letters which you resubmitted will be made a part of the Ninety-Six Ranch permanent record.

I would like to assure you that your concerns will be taken into consideration when the land use decisions are made for the Paradise-Denio area. As you know these decisions are scheduled to be made in December of 1981.

I recognize that there have been problems in the past between the Bureau and yourself. However, I feel that your input is important and hope that we can keep the lines of communication open.

Sincerely yours,

Vaden G. Strickley
Acting District Manager

March 23, 1980

DeLong Ranches, Inc.
Box 1058
Winnemucca, Nevada 89445

8

Dear Mrs. DeLong:

After seeing the Scoping Section the other night I'm at a loss as to what to answer. It seems we've had hearings on about all of these issues in our process. You've had our verbal reports and our written letters on most sections of your Proposed Actions.

As a result of 35 years will be used for determining future development projections. If you (the BLM) had kept your TREND studies for the last 35 years you would have a lot of your answers to the questions you ask. Instead you seem to want to know what we think about the future. Let the truth take over. We'll never hold line to kill every cow off the face of the earth.

If you are going to want to produce more food for the wild horses and burros, it looks to me if you should make some monetary returns on them. I think the Adopt a Horse market has reached the saturation point.

I know some of the wildlife in our area has increased much. We see hundreds of deer on the summer range where we used to see by tens. Some birds seek the protection of our fenced pastures.

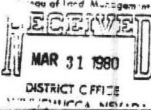
I hope Nevada can keep control of our water.

The social and economic values and the effects on our life styles, makes it sound like we are freaks of some sort for ever living on ranches in the country. We pay our taxes, spend most of our monies in the community. Strive to have our kids have a well rounded education, mix with others in our community. Encourage our kids to join and participate in sports. We work for the best of our ability for the others in our area. Belong to Farm Bureau, Cattlemen's, Cow-Belies, Foremen's, 4-H's, our political party. We donate time and materials to others that request our help.

Wilderness potential is too late. People have moved all over this country. I do think people really don't want a true wilderness. Over the years we've lost our, pulled people out of mud holes, lost their food, beds, rides, firewood, and let the public use our land for facilities, also our tolerance. I think they have been glad to see us living here on the edge of nowhere.

Grading permits values: This frightens me. The value of an ATM has been a big factor in the value of a ranch. The ranches that have spent a lot of money recently would be at a great disadvantage if all the money spent were to come back down in value. But then our income too would go down. Hopefully your ways along with it.

Yours truly,
Dale DeLong, Sec



United States Department of the Interior

IN REPLY REFER TO
1792
(N-022)

BUREAU OF LAND MANAGEMENT
705 East 4th Street
Winnemucca, Nevada 89445

April 21, 1980

Dale DeLong
P.O. Box 1058
Winnemucca, Nevada 89445

Dear Mrs. DeLong:

Thank you for your comments concerning the scoping process for the Paradise-Denio Environmental Impact Statement. Your concerns will be taken into consideration when the EIS is written for the Paradise-Denio area.

The area manager's recommendations are the result of a rather lengthy process. Each resource specialist on the district gathers as much information as he can about his particular resource. He then gives to the area manager a set of selfish recommendations that he would like to see implemented for his resource. The area manager then takes all of these selfish recommendations and attempts to resolve the conflicts between them. The area manager's Step II recommendations is the result of this conflict analysis.

If you wish I will ask the area manager to discuss his specific recommendations with you.

Sincerely yours,

Vaden G. Crickley
Acting District Manager

9

Nevada First Corporation

Farming Ranching Land Development

620 Melarkey Street, P.O. Box N / Winnemucca, Nevada 89445 / (702) 623-2536

April 1, 1980

Mr. William J. Harkenrider, Jr.
Paradise Denio Area Manager
BLM Dept. of Interior
705 East 4th Street
Winnemucca, Nev. 89445



Subject: Comments on "Preliminary Scoping Document for Paradise-Denio Environmental Impact Statement"

Dear Mr. Harkenrider:

Please consider the following comments when developing the final scoping documents for Paradise-Denio EIS.

General: "The purpose of the statement (EIS) is to analyze the potential impacts on the human environment resulting from the implementation of a vegetative allocation program." - from your preliminary scoping document.

How can you even begin with out knowing the final MFP for the area? All indications are that the MFP is no more than guidelines and final planning and implementation of proposals are to be on a case-by-case cooperative basis. Each allotment is to be assessed intail with management plans, range improvements, trend site development, grazing reductions or increases, wildlife and wild horse allocations and/or management to be mutually agreed upon by all multiple use interests. The final plan decision must include negotiation and concessions by all multiple use interests and the BLM. It will certainly differ from the present MFP and the "scope" of its EIS will differ as well. The premature scoping of the EIS only provides a shelter forcing the plan to an irrational, incomplete final decision. The "scope" must depend on the details of the final plan-considering all provisions for on-going changes, otherwise an EIS will need to produce for each decision regarding grazing in the future. One overall Resource Area EIS is the intent of the NRDC suit, it cannot be completed until the sum total of all allotment plans for the resource area are complete. The BLM efforts, time and resources should be spent to develop and implement each allotment plan. The sum total of these agreed plans constitutes the resource Areas Plan which requires an EIS. As it appears now, you have the "total" and are adjusting arbitrarily each allotment so the "total" comes out correct to fit your predetermined result.

Much of the EIS work done prematurely will be irrelevant or need serious modification-even rescoping.

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Specifically: I Proposed Action

A. Allocation of vegetation for big game should be done with consideration of the vegetation type actually consumed by the big game not merely by AMN's as currently used.

F. Must include resources, personnel and funding required to keep all trend studies current and on-going for 10-15 years at least.

H. Must consider development and theory of AMN's currently in use and whether they have yet to complete a "cycle".

Also must include historic use over the entire domestic grazing history- at least 100 years including immigrant trails, sheep and cattle trails, wild horses and wildlife. Should also include evaluations of trend periods and why all "cycles" occurred, (i.e. 1880-1900, 1900-1920, 1920-1940 etc) whether cycles were due to available vegetation, disease, economic demand etc. This will give a historic "trend" perspective to the entire EIS. Could prove the value of the Taylor Grazing Act and existence of BLM, should also include cost of such management relative to returns to taxpayers and permittees.

II Alternatives: - All alternatives must be within guidelines of legislation now existing and those proposed.-especially multiple-use directives and wild horse and burro laws. They should be technically, legally and financially feasible, otherwise are not truly alternatives.

III Significant Issues:

Vegetation: Should include selective production improvement and introduction of new species

Socio-economic: Should have the greatest detail attention of all significant issues. We are concerned with the human environment and socio-economic life if what differentiates one nation from another. It is the American way of life and absolutely a part of our human environment.

The socio-economic impact on human activity in the resource area, state and U.S. has to be evaluated.

The bottom line is - Who will benefit from the planned grazing changes, how will they benefit, at what cost and with what final return?

Sincerely,

Gary A. Thrasher
Executive Vice-President
Nevada First Corporation

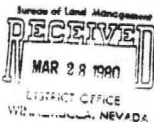
Nevada First Corporation

Farming Ranching Land Development

520 Melarkey Street, P.O. Box N / Winnemucca, Nevada 89445 / (702) 822-2586

March 27, 1980

Mr. William Harkenrider, Jr.
Area Manager - Paradise-Denio Resource Area
Winnemucca District, Bureau of Land Management
U.S. Department of Interior
705 East Fourth Street
Winnemucca, Nevada 89445



Subject: Comments of Paradise-Denio MFP Step II

Dear Mr. Harkenrider:

The following comments are offered:

Lands: add - b. Provide for land trades with private owners to "block" areas of previous "checkerboard" ownership. Present "checkerboard" pattern is difficult, if not impossible to manage or improve in the public and private owners best interests. In making such trades appraisals must consider water availability under state laws after government lands are transferred into private ownership. Past government decisions have not considered state restrictions on water improvement after it becomes private land.

Wild Horses and Burros: This proposal, to set up a "wild horse refuge" in the entire Ovshes spring range, excluding all livestock grazing and remove all wild horses from the remainder of the resource area, is not the intent of the original Wild & Free Roaming Horse & Burro Act and is opposed by most of the "Wild Horse" interest groups. I have discussed your proposal with representatives from "W.H.O.A." and "I.S.P.M.B." who find your proposal unrealistic and not in the best interest of the wild horses nor grazing permittees. Not only is it impractical but it removes many horses from their "natural range". Management and population control at a practical level throughout the resource area is more desirable to the "wild horses" interests and us both.

Your comment that Nevada First Corporation should sacrifice its spring grazing allotment for the good of the permittees in the entire resource area looks like a ploy to alienate Nevada First Corporation and neighboring permittees. It creates a personal interest to us which we must address in time and resources which overshadows our participation in any "group" problem of our neighbors.

Range Management: The proposed allocation of AUM's represents an enormous reduction of grazing capacity with out any regard for Allotment Management Plans that are now in effect. In fact, very few have completed

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a "cycle" without being altered in some way so that trends of improvement are impossible to measure. Of the few (approx. 30) photo trend plots on over a million acres of our allotments none have been followed through and they weren't put in until 1972, many years after your last range survey.

Many discrepancies and differences of opinion cast doubt on the validity of the current range inventory on which you base your grazing reductions.

If, on any particular allotment, the range condition truly justifies a reduction it should be done on a "cooperative implementation" basis with effectively monitored trend studies to affect gradual reductions or increases as trends indicate. The "full force and effect" attitude is devastating for permittees and is economically irreversible.

Your proposal to seed areas and control sagebrush is hollow in light of the districts history over the past eight years. It should have the utmost priority and be implemented far before any across-the-board reductions in AUM's.

Staggered or pyramid licensing should not be eliminated. While more difficult for BLM to administer, it is, at times, the most efficient and reasonable way for permittees to use available AUM's. Certainly your jobs would be easier without staggered and pyramid licensing, but our job would be much easier without the BLM.

Sincerely,

Gary A. Thrasher
Executive Vice-President
Nevada First Corporation



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 21, 1980

Gary A. Thrasher
Nevada First Corporation
620 Melarkey Street
Winnemucca, Nevada 89445

Dear Mr. Thrasher:

Thank you for your comments concerning the preliminary scoping document for the Paradise-Denio Environmental Impact Statement and the MFP Step II. Your concerns will be given consideration in any land use decisions which are made for this district. The decisions for the Paradise-Denio Resource Area are scheduled to be made in December of 1981.

The Environmental Impact Statement is an analytical document that is prepared to help the district manager arrive at the best decision he can possibly make. The EIS itself does not make any decisions. It merely gives the district manager a prediction of what is likely to happen if he implements a particular land use alternative. For instance, the EIS will tell the district manager that if he implements a grazing reduction on the Paradise-Denio Resource Area what the affect of that action will be on vegetation, soils, livestock, wildlife, economics, social values, etc. This analysis is then completed for each alternative. The district manager then considers these impacts before he makes his land use decisions.

Coordinated resource planning is a new concept that has recently been introduced for consideration in allotment management planning. The Winnemucca District fully supports this concept and is willing to work through this system to achieve the best plans possible.

If you have any further comments or questions please feel free to call on me at any time.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



UNITED STATES DEPARTMENT OF AGRICULTURE
AGRICULTURAL STABILIZATION AND CONSERVATION SERVICE
Nevada State ASICS Office
P.O. Box 360
Reno, Nevada 89504

March 10, 1980

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

Dear Sir:

The Nevada State Agricultural Stabilization and Conservation Committee have requested me to respond to your major recommendations for the Paradise - Denio resource area. They have made their recommendations as follows:

Lands

They feel the areas mentioned are well defined and allow for adequate flexibility.

Minerals

Number 3 should also include rock, and it should not be confined to just one site. There could be two or three sites for each community. Energy use has to be given consideration in all matters, so hauling distances have to be a major factor.

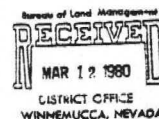
Number 4 C - If a five-mile buffer zone means width, it may be too much - one-half mile would be more appropriate.

Wild Horses and Burros

We feel that confining wild horses and burros to one range and eliminating them from the remainder of the resource area is a real step in the right direction.

Watershed

Number 3 - We particularly like controlled burning because it can enhance the vegetative cover in many areas.



Range Management

We feel that the stewardship program should be adapted for the area

BLM Should work with other agencies of government to participate in funding public range and private range rehabilitation projects with the permittees. This will effect a maximum conservation benefit as well as mitigating the effects of severe grazing cuts. This should include seeding, shrub control, and water development.

Water

Obtaining water rights should only occur when that source of water is being threatened as to availability for public use.

The Nevada State ASC Committee feels that the initial BLM proposal to file on 3,000 or more water rights caused quite an upheaval. It is not cost-effective for you to do so, and you also do not have the time or personnel.

Another agency of government has quietly filed for water permits for campgrounds, picnic areas, etc., for years when it felt the absolute necessity for such a move. They have done it without so much as raising an eyebrow. We feel the BLM can do thusly and still remain in the good graces of the sportsmen, miners, hikers, and permittees alike.

We submit the above recommendations, hoping they will receive careful consideration. What we are mostly suggesting are addendums to quite a comprehensive plan.

Sincerely,

Al Pasquale
Al Pasquale
State Executive Director
for the Nevada State ASC Committee



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 22, 1980

Al Pasquale
U.S. Dept. of Agriculture
Nevada ASCS Office
P.O. Box 101
Reno, NV 89504

Dear Mr. Pasquale:

Thank you for your comments concerning the recommendations made for the Paradise-Denio Resource Area Land use plan. Your concerns will be considered in any land use decisions we make. The land use decisions for the Paradise-Denio Resource Area are scheduled to be made in December of 1981.

The concept of Coordinated Resource Planning has recently been introduced for consideration in this area. The Winnemucca District fully supports this concept and is willing to work through this system to achieve the best plans possible.

The stewardship program is an experimental program presently being set up in the Topopah Resource Area in which the permittees become involved in the management of the public lands. We feel that the Coordinated Resource Planning will accomplish the same thing by getting the livestock operator involved in setting up the grazing system and monitoring its progress.

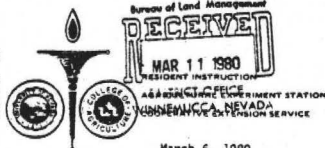
If you have any further comments or questions please feel free to contact us at any time.

Sincerely yours,

Vaden C. Stickley
Acting District Manager

MAX C. FLEISCHMANN COLLEGE OF AGRICULTURE

UNIVERSITY OF NEVADA RENO
KNUDSEN RENEWABLE RESOURCES CENTER
1090 VALLEY ROAD
RENO, NEVADA 89512



March 6, 1980

Glen Stickley, Acting District Manager
Winnemucca District Office, BLM
705 East Fourth Street
Winnemucca, Nevada 89445

Dear Glen:

I appreciate the opportunities to review and comment on your MFP II proposals and your EIS scoping as provided by your briefing this week in Carson City and by the materials passed out there. My comments follow.

While I certainly do not agree with all the MFP II recommendations, most appear quite straight forward and, if adequately addressed in the EIS process, sufficient technical information and public opinion should be generated to adjust recommendations as necessary. However, I have a few comments that seem appropriate at this time.

First, I would urge a thorough review of your range survey and related processes and methodologies by a qualified outside expert. Based on my knowledge of range methodology and of range conditions in Humboldt County, I cannot conceive how you can come up with 243,000 AUMs of forage in the mid-60's and only half that in the late-70's - using essentially the same system. (Perhaps this should be noted with scoping comments)

Second, there was quite a bit presented orally at Carson City about reintroductions of Big Horn Sheep, but there is little note of this in the MFP brochure. Reintroduction of a wildlife species is a major sort of decision in terms of land use and range management and the final decision should carefully consider informed public opinion. Therefore, I think you need to give more public emphasis and clarity to these recommendations now.

Third, another area not clear in your brochure is the apparent determination to recommend no livestock grazing during the months of April and May (stated clearly at the briefings). Yet, in the brochure you say you are going to establish seasons of use for each allotment based on physiological requirements of key plants. If I understand the present intent, that statement is much more than misleading and should be publically corrected. Removal of all livestock from the Federal range in April and May would be a major action and certainly your intent must be made clear to all concerned. In my opinion it is also an unnecessary (even undesirable) action, a concept that most range managers discarded 30 or more years ago and one I thought we had talked the Nevada BLM out of in 1977. But that's not my primary point here.

Glen Stickley
Page 2

March 6, 1980

Fourth, as I pointed out at the briefing, the second part of the third range management recommendation is technically and scientifically unsound. The concept of proper use factors in a range survey is totally different from the concept of proper use of key species in managing proper range utilization.

Fifth and finally, your brochure does not state that your recommendation for a 398,000 acre wild horse range on the Owyhee Desert includes the recommendation that livestock be excluded from that area. That point should be made clear to the public.

Now to the "scoping". First, considering that "early and open scoping" has been the "regulation of the land" since last July (and public knowledge since December, 1978), I think you're pretty late in getting the public involved and I think this is unfortunate. At this point, most of us have the feeling that the game plan has already been established and that you really haven't wanted much outside comment until "it's too late to change". True or not, you have produced an environment that does not invite positive public participation.

I understand that a small group of ranchers with some local public officers are working on a "local alternative". I think it is very important that a locally feasible and acceptable alternative be considered and if I can help in any way in developing it, I'll be most pleased to do so.

The "significant issues" listed in your preliminary scoping document look like they've come directly from a national manual rather than developed on the basis of local conditions and perceptions. Under "vegetation", you list only "production" as an issue. Certainly the survey methodology are a significant issue. Also important are present condition and trend of the vegetation, use and management of annual forage, grazing management systems, "proper" seasons of use, and any and all assumptions made in anticipating specific quantitative vegetation change (including production) from alternative management schemes and treatments (specifically projecting changes 35 years hence).

I'm sure there are a number of other significant issues beyond these range management issues I've noted. However, I think there are others who are more qualified that will respond.

I hope you will find these comments and suggestions helpful to you and that they will be passed along to the appropriate people. Perhaps they sound overly negative and critical, but my intent is to be constructive. I also hope you will feel free to consult with me further and utilize whatever expertise I have.

Sincerely,

John L. Artz
JOHN L. ARTZ
Range Scientist

JLA:ldd



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 22, 1980

John L. Artz
Range Scientist
Las V. Purserman College of Agriculture
University of Nevada-Reno
Knutsen Renewable Resources Center
1900 Valley Road
Reno, Nevada 89512

Dear Mr. Artz:

Thank you for your comments concerning the Preliminary Scoping Document for the Paradise-Denio Environmental Impact Statement and the MFP Step II. Your concerns will be given consideration in any land use decisions that are made for the Paradise-Denio Resource Area. These decisions are presently scheduled to be made in December of 1981.

If you have any suggestions as to how we can improve our scoping process we would be glad to discuss them with you.

The significant issues which you address in your letter are especially helpful and will be addressed in our Environmental Impact Statement.

We would also like to know what studies methods you would recommend that we use, to best gather information in a short period of time. This is an especially troublesome area.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



975 Fifth Street - Elko, Nevada 89801
(702) 738-6846

April 25, 1980

- OFFICERS
PRESIDENT
FIRST VICE PRESIDENT
SECOND VICE PRESIDENT
EXECUTIVE SECRETARY
EXECUTIVE COMMITTEE
FAST PRESIDENTS

BUREAU OF LAND MANAGEMENT
District Manager
Winnemucca District
705 E. 4th St.
Winnemucca, NV 89445

Dear Sir:

On behalf of the Nevada Cattlemen's Association and the permittees in the Paradise-Denio Resource Area, we are requesting that your comment period on the MFP Step II be extended to May 16, 1980.

We strongly feel that this additional time is needed to allow permittees adequate time to get input into the next stage of the planning process. This is a busy time of the year for ranchers and time is hard to find in which adequate input can be made. Such important decisions should have more than 30 days for input.

Sincerely,

Dave Secrist
President

cc: Mr. Ed Spang
Bill Hall



NATIONAL CATTLEMEN'S ASSOCIATION
Affiliate Member



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 30, 1980

Dave Secrist, President
Nevada Cattlemen's Association
975 Fifth Street
Elko, Nevada 89801

Dear Mr. Secrist:

The District Manager's Decisions on the land use plan (MFP) being prepared for the Paradise-Denio Resource Area are presently scheduled to be made in December of 1981. Comments on this plan will be accepted and considered throughout this twenty (20) month period. We sincerely hope that all of the permittees in the Paradise-Denio area get together with the Area Manager and discuss his recommendations in detail as they pertain to their grazing allotments. He is available to discuss his multiple use objectives on each allotment, and how they were developed.

We are also preparing an environmental impact statement on the Paradise-Denio area. The EIS is scheduled to be completed by September 30, 1981. The comment period for scoping portion of this process ended on April 11, 1980. I assume that this is the deadline that you and the Paradise-Denio permittees would like extended until May 16, 1980. We will be happy to receive your comments at any time during the EIS process and they will be given full consideration. However, because of printing deadlines and schedules which must be met for us to complete the EIS on time, comments received after April 11, 1980 will not be published in our final scoping document.

I hope that this clears up any misunderstanding there may be about our schedule concerning the land use plan for the Paradise-Denio Resource Area. The land use decisions will not be made until at least December, 1981.

Please contact Robert Neary of our planning and environmental staff if this is still not clear.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



HUMBOLDT COUNTY REGIONAL PLANNING COMMISSION

CITY/COUNTY COMPLEX • WINNEMUCCA, NEVADA 89445
(702) 883-3081

April 11, 1990

Mr. William Harkenrider, Manager
Paradise-Denio Area
Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445



Dear Mr. Harkenrider:

RE: Preliminary Scoping Document for Paradise-Denio Grazing Environmental Impact Statement

The Humboldt County Regional Planning Commission will be discussing the proposed grazing cuts, the scoping document, and the Management Framework Plan at their meeting of April 24th.

At this time, I would request that you and your staff reserve time for the Planning Commission's comments to be given FULL consideration in your process. That is the prime reason that this letter is being written and submitted before the 4:30 p.m. cut-off today.

The secondary reason is to submit my own comments as a professional staff member.

As I see it, another alternative needs to be added and examined. That is the use of "Coordinated Resource Management Planning", such as occurs on the Sheldon Antelope Range, and in Oregon.

The CRMP approach would allow a more sensitized approach, with the BLM, Soil Conservation Service, Agricultural Stabilization and Conservation Service, Cooperative Extension Service, and the rancher to develop a rational work plan.

The plan(s) would be developed within the context of the four principles of "Coordinated Resource Management Planning":

1. The plan must involve multiple resources.
2. The process should involve multiple agencies.
3. One or more ownerships (or allotments) to be involved.
4. The coordinated planning process is followed
 - a. with user groups involved in the process from the beginning to the end.

April 11, 1990
page 2

The plan(s) would be subject to annual reviews, such as occurred yesterday--when the Sheldon CRMP was reviewed.

The environmental and resource groups, in Oregon and on the Sheldon Range, are pleased with what has been done, both in methodology, attitude-orientation, and results. In light of the N.R.D.C. suit, I think it is very relevant.

This also appears to be consistent with what Bill Anderson tells me is about to happen in the Bureau. Frank Greco and others have told Bill that there are going to be changes. The changes in the Bureau will be more toward discussion-orientation-cooperative agreement and implementation-orientation. The changes in the orientation that may have characterized, and stereotyped the Bureau.

Enclosed is an article by Bill Anderson on the CRMP process. Also I'll be forwarding a copy of my notes from Wednesday's CRMP Workshop in Reno. The workshop, heavily attended by BLM (Tom Owen, Ed Soano, etc.), Forest Service, SCS, Conservation districts and other agencies' officials, concluded with apparent unanimity that we need to implement CRMP in this State as soon as possible. A report to this effect will be forwarded to the State Committee for Multiple Use on Federal Lands, who will be expected to act on it.

As a result, I think that Coordinated Resource Management Planning (CRMP) should be included in the scope of the Paradise-Denio EIS.

Thank you, in advance, for your full consideration of these matters.

Sincerely,

Matt Morris
Director of Planning

cc: Mr. Joseph Gough
Mrs. Sammie Uvalde
Mr. Ed Soano

attachments

kv

Matt Morris

Planning the Use and Management of Renewable Resources



E. William Anderson
Consultant in Renewable Resources
1609 Hemlock St., Lake Oswego, Ore. 97034

Reprinted from *Ranger's Journal*
Vol. 4, Nos. 4 and 5, August and October 1977, p. 98-102, 146-147

Editor's note: This article is timely but lengthy—hence it is published in two parts. It tells what renewable resource planning is all about, gives the background, benefits and importance of planning, which should be helpful to the new crop of planners coming on. It is also a reminder that resource planning didn't start just yesterday.

Resource planning is building up a great deal of interest among agencies, organizations, and disciplines. Involved is a new group of resource workers who have had little or no contact with the background philosophy and principles that were developed over a period of 30-40 years. During this process, the whole coordinated resource management planning technique originated, developed and then was refined. This article is intended to summarize these experiences and ideas on the new crop of the major basic concept that guides all resource planning from the beginning.

Part I

Range and wildlife management, forestry, soil science and other resource disciplines are unquestionably more advanced today than ever before. Despite this advance, much of it introduced, there is considerable public dissatisfaction with the conduct of certain resource programs. People who feel their interests are being short-changed are forcing major program alignments. This leadership is asking that the whole environment, including the society of man, be taken into account in pursuit of resource programs.

Foresters, for example, are being attacked by critics who insist that forests have values beyond the production of trees. These critics probably do not object to the cutting of trees. However, they do object to the methods used—the sudden disruption of the natural scene, the expansion of road systems, the resulting erosion, the silt and debris in streams and lakes. The critics apparently think that foresters are not acting like the land and

resource managers which they should be, but are mere producers of trees from land on which they have much broader resource responsibilities.

Similar criticism also has been directed at other resource workers in such fields as range management, wildlife management, and farming. Much of this criticism is justified, but it is not wholly a people problem. It is important to recognize that the policies, philosophies, and modes of operation of certain industries, groups, and public agencies have drifted from resource workers to conformity with their wishes even though they do not personally approve.

Such criticism emphasizes the absolute necessity for resource disciplines to work together and with resource users. It points to the obvious need for the kind of thoroughly designed, practical plans for the use and management of renewable resources that will result in action out on the land.

Why Plan?

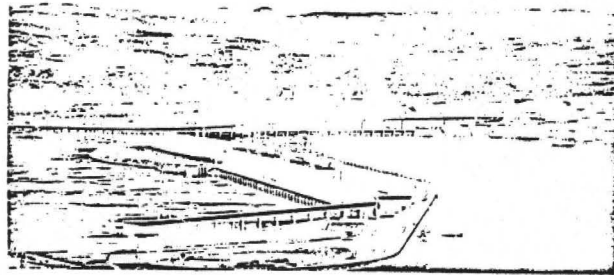
Man and his environment are inseparable and interactive. Just as man is capable of altering his environment, man's environment influences him. Without guidance, the interaction will have both adverse and beneficial aspects. If the interaction is to be mutually beneficial, it is essential for man to design thoroughly an appropriate plan and put it into effect.

As the public learns more about environmental matters and their inter-relationships, resource planning becomes even more important, increasingly, when we plan for something to be done on the land, we must concern ourselves with the second and third order of consequences, not just the obvious—immediate. Doing this job well requires a higher degree of technical and professional competence than ever before.

Workers in renewable resources must begin to regard our individual disciplines as one integral part of the whole ecological complex. Only in this setting can we effectively promote the ecology of our individual disciplines, none of which can afford to continue acting unilaterally.

Tunnel Vision

Too frequently, we resource workers do not think about the environment—about the second and third order of consequences that take place when we do something out on the land. One major reason is that our attention is divided by bureaucratic functions, by our disciplines, and by our philosophies.



The Oakes Dam is one of a series of dams on the Coquille River system in the Pacific Northwest. When it was constructed it inundated an important Indian fishing site. Coquille Falls, Mount Hood and the city of The Dalles, Ore., are shown in the background.

Segregated bureaucratic functions: An overall umbrella of segregated attention is created by the conflicts that occur between programs and policies of various agencies. Let us consider some examples.

Highway departments build roads at the least possible cost, often disturbing neighborhoods, landscapes, farmland, and resulting in enormous social discomfort. Simultaneously, other agencies are striving to reduce social discomfort.

Engineering agencies construct dams on major river systems to provide hydropower, flood control, irrigation, and navigation. This drastically and adversely changes major waterway habitat and fish migrations. At the same time, Fish and Wildlife agencies are conducting programs to enhance fish and wildlife populations.

Industry, including some governmentally financed projects, occupies prime agricultural land and flood plains. Simultaneously, government agencies carry on a strong program to preserve our food- and fiber-producing lands.

Individuals, we can not do much to stop this bureaucratic segregation. However, it helps to recognize that the discretionary bureaucratic umbrella does exist and that we have to work under it. Yet we must try to overcome its effects at the field level.

Segregated disciplines: Segregated attention among disciplines commonly exists within a single agency or organization. It should be of more concern because we can do something about this. Again we have examples.

Engineers, using public funds, design and construct reservoirs deliberately planned for a mere 50 to 100-year life expectancy due to siltation. No provisions are made or funds provided to actually conduct a land treatment program on each reservoir's watershed which would reduce erosion so as to prolong the useful life of the reservoir.

Rangemen make plans and eradicate shrubs without coordinating with wildlife biologists. Such action, however benevolent

from a forage production standpoint, can be highly detrimental to habitat and populations of wild animals and birds. Through coordination, essentially the same forage benefits can be achieved while at the same time leaving planned areas for wildlife food, cover, corridors of travel, sanctuaries, and nesting areas with results that are pleasing to the eye.

Forestry agencies compute allowable annual cut on the basis of all trees growing within a locality. In order to meet this cut, roads are built into isolated, often steep and inaccessible, patches of timber. As a result, people and machines then have access to areas vitally needed as wildlife sanctuaries at certain seasons; seasonally required cover, especially for wildlife winter protection and migration, is removed; quality hunting is destroyed. Siltation of streams is increased in direct relation to the road system installed; the hydrology of the watershed can be changed to cause massive downstream damage. At the same time, other disciplines, often within the same agency, are striving to prevent such happenings.

Segregated philosophies: Differences of opinion, objectives, or degrees of understanding among workers within a single discipline make for segregated philosophies. Let us consider the possibilities that may be involved.

Rangemen, agriculturalists, and graziers burn or otherwise eradicate trees in favor of forage. On certain sites, trees may be the best crop from an ecological standpoint and, over a long period of time, they may become the best economic crop. In order to protect young trees, foresters prohibit livestock grazing, but ungrazed herbaceous plants may compete with and damage growth of young trees more than proper grazing does.

Extremes sponsor no-hunting laws to preserve game herds, while wildlife population dynamics and herd-food relationships make controlled harvest of wild animals mandatory if reasonably uniform and healthy herds are to be maintained.

A tunnel-vision approach often can be gloriously successful but it collides disastrously with principles of unity. Damming an entire river system is a glorious accomplishment. The second order of consequences, however, can be disastrous to anadromous fish, waterfowl, and recreation. In time, a third order of consequences can be equally or more disastrous when the reservoir eventually fills with mud. The original benefits of power, flood control, irrigation, and navigation are diminished beyond acceptable levels without periodic maintenance costs.

It is easy to recognize that there is a lack of communication between some disciplines and agencies. However, the basic problem is segregated attention, or disciplinary tunnel-vision. It appears that an important reason for our abuse of the environment is that, in our modern goal-oriented society, the principle of segregation, which has isolated us from the natural creature-comfort and immediate income, is undermining the principle of unity. This is producing an ever-increasing degree of disorder, inconvenience, and discomfort. Fragmentation of effort is one of our major problems and a major impediment to progress.

We must and can do something about this situation. One solution lies in the use of an inter-disciplinary, inter-agency team of specialists to work simultaneously on a project. The team should include appropriate resource users and organizations. This approach should begin with scheduling at the field level. Teamwork must be deliberately planned and not left to happenstance. Otherwise, already-scheduled commitments could be used as good excuses by some individuals for not coming to the team, thus permitting them to continue working comfortably in a tunnel-visioned, unilateral setting, if this is their inclination.

The team members must start working together at the initiation of the project and not start functioning as a review team after planning is well under way. Independent reviews, referrals, reports, staff conferences are not a substitute for planning input concurrently from various disciplines, managers, and users. Today's resource program is strongly oriented around a highly trained specialist who has a broad-based background, training, and experience in resource matters. Teamwork helps develop this type of individual and thereby produces new leaders, who are greatly needed.

Principles and Concepts of Resource Planning

Planning can be defined as the process through which decision-makers marshal the facts and consider the potentials and alternatives before embarking on a course of action. It is the process which guides deliberate action.

Planning includes study, evaluation, and selection from existing alternatives concerning the future course of action. It also includes scheduling the amount of time and setting dates for planning functions in relationship to other work assignments. Major objectives of resource planning are to assist people to appreciate the nature, extent, and importance of the resources and thereby become involved and more active in resource undertakings; to understand and manage the resources for present and future use on a sustained basis within the capabilities of the land and in harmony with other uses of the resources; to understand and improve the quality of the present and future environment; to obtain optimum social, economic, and environmental values from limited renewable resources while maintaining future development options; and to recognize and develop resource-based economic opportunities.

Planners, especially those who lead the planning process, should be aware that there are certain factors that influence

decision-making; among them is the fact that people are goal oriented and vary in their ability to observe the future—usually this ability improves with their commitment to a cause and with their increasing interest and optimism.

Most planning is accomplished as the decision-makers become aware of limiting environmental and other factors and as they look ahead to determine probability and desirability of future states of affairs.

In almost every planning situation there are both rational and irrational reasons for or against change. Both must be recognized and dealt with objectively. FACTS provide the best answer to irrational reasons.

Planning must be legitimized not only by action of official decision-makers (landowners, representatives of agencies and organizations) but also by agreement of the public.

Planning should be based on sound sociological principles: the influence to change is most effective when it comes from the persons who form the group that is to be changed; the more that individuals of a planning group, including agencies and organizations, discover for themselves the need for change, the stronger will be the desire to do so; continued support of planning decisions will be strongest when all those concerned assist with all steps in planning. Changes in attitudes, values, and actions are most effectively brought about when the decision-maker feels that the changes to be made are relevant to his objectives.

Planning renewable resources requires that the following points be observed: planning should be done with people, not for them; facts about the resources are key to sound planning decisions; the role of technical people includes that of "helper" and this generally should be an inter-disciplinary, inter-agency team effort; resource plans must be flexible and open-ended to accommodate changes when needed; goals may not always be clearly defined and may need to be amended as time goes on; information upon which plans are based is seldom complete; and only some of the available alternatives can be fully evaluated.

Terminology

There are various kinds of resource planning that differ primarily in their objectives and in the level of generalization with which they deal with the resources. In order to differentiate between kinds of planning so as to improve communications, the



National Marine Fisheries Service photo. Pacific Northwest incident of many inns fishing salmon with nets at Clatsop Falls before the area was inundated by The Dalles Dam on the Columbia River. Second and third order of consequences have included long-lasting controversy, recreation, and "regain over river fishing rights and streams.

following three types are proposed for our purpose: land use planning, resource management planning, and project planning. Land use planning is the type used when general-purpose use of government (State Land Conservation, Developmental Commission or County Planning Commission) make plans that guide the use of land resources owned by individuals, or corporations, or managed by agencies of government (such as the Forest Service, BLM, etc.), generally within large areas as a county or state. Decisions are made through political processes initiated by owners and managers.

It involves the development of public policies, rules and regulations that guide how other people can manage or use their land (such as building along seashores). It is a government process that directly regulates or influences the use of land that is not owned or directly controlled by the unit of government that does the planning. This type of plan is framework planning. It involves a high degree of public opinion, thus considerable involvement of the general public usually is needed, with public meetings characteristic of the planning process.

The end product is usually defined in broad terms: for example, a high quality environment. Guidance consists of generalized instructions or precautionary statements regarding what should/should not be done with the resources.

This type of planning has received some opposition from rural citizens. However, the reasons why land use planning is important to them. First, it tends to cut down on loss of agricultural, grazing, forest and other rural land to urban sprawl and the resulting nuisance complaints and conflicting uses. Second, it provides a means of retaining and protecting the physical, economic, and social aspects of the rural area.

Resource management planning deals directly with a specific area of land and with resources owned, controlled, or managed by an individual(s), corporation(s), agency(s), or a combination of these. Decisions are made by the landowners, managers, and major users of the resources on the policies, rules, and regulations sponsored by the framework or land use plan, if one exists, that encompasses the planned area.

Public input is specific and generally limited to those who are actually involved in the planned area. The end product is a series of more-or-less specific decisions, depending upon the apparent need for specification and detail. Project planning is the type aimed at the construction or installation of a project or measure, like a grazing system, which has been decided upon during the resource management planning process. The end product is a set of specifications for completing the project according to a required standard. Public input is very specific and usually limited to those who will actually use the project.

Project plans are usually addenda to resource management plans and are developed in sequence over a period of time according to the priority placed on completion of each project. The difference between these three types of resource planning probably does not make one type more important, relevant, or difficult than the others. However, these differences are significant when it comes to getting the job done out on the land.

Throughout the three types of resource planning, goals must be established and used differently. Data needs are vastly different. Therefore, procedures to transfer land use planning techniques to resource management planning situations, or vice versa, are likely to be unsuccessful. Neither can project planning techniques be applied to resource management planning, or vice versa.

Land use planning entails the constant testing and retesting of public goals and objectives. The decision-makers must decide

whether or not proposed development or land use is in keeping with current goals and objectives. They may periodically change the goals depending upon their view of the current situation. In land use planning, decision-makers make social choices. Since this planning is more involved in goal testing than in goal achievement, the appropriate planning methods should more like political science than like environmental design.

Resource management planning, while also carried on under public scrutiny and with periodic reassessment of goals and objectives, consists of more conservative choices or centralized decisions. It lays the groundwork for the action that will occur out on the land.

Project planning deals primarily with capital improvement projects such as stockwater ponds, stream riprap, or forest thinning. However, it also includes such detailed projects as grazing systems, timber programs, timber investing funds, and roadway systems; it is resource development and management in action.

Decisions made during land use planning often have second and third order of consequences that are difficult, if not impossible, to predict accurately. For example, an ordinance designed to obtain a desired growth pattern in a community may bring about individual private decisions by local businessmen or residents that collectively insure that the desired pattern of growth will never materialize. In contrast, decisions made during resource management planning are carried out by the individuals or agencies that developed the plan. Once the plan is completed and funds are available, the plan can be implemented with a minimum of help from other people or agencies outside of the planning group. The prospects for accomplishing a substantial part of a resource management plan are good—vastly better than most land use plans—because it is a totally different kind of plan.

Rangelands, forests, ranches and farms, rural and urban communities do not stand in a row at any specific one place, or corner. Appropriate predictions of the end-state are of dubious value. Computerized decision-making, however popular and useful, is no substitute for the brain-power, expertise, experience, and multiple judgement of an inter-disciplinary, inter-agency planning group working in unison.

It is a procedure of resource management planning and/or project planning, the continual positional goal-testing and "holding around" that dominates land use planning may seem to be a wasteful, inefficient effort that detracts from resolving issues or creating workable plans. It may also be apparent that a great deal of time and money goes into land use planning, yet such plans may not directly, and often not even indirectly, result in action out on the land. However, this kind of planning receives good publicity, which results in its being publicly and politically popular. It often receives good funding which in turn causes agencies to establish in program end-state drift with publicity—in order to get a share of these funds. It is also a fair observation that land use planning often attracts and provides positions for people who are practically incapable, because of a lack of know-how, of making the kinds of specific decisions that characterize resource management planning and project planning.

This article will be concluded in the October, 1977 issue of R.J. Part II discusses citizen involvement in the planning process. It outlines a project planning technique which represents how resource management planning is done in order to put into effect the principles and concepts discussed herein.

Part II Planning the Use and Management of Renewable Resources

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This is a continuation of a discussion started in the August, 1977, R.J. Part I presented the reasons and need for planning. It showed why resource workers often do not think of the second and third order of consequences that take place when something is done out on the land. The tunnel-vision approach is explained with examples. Principles and concepts of resource planning, with appropriate rules, are explained and compared as to their inherent terminology and improve communications. Part II deals with resource management planning, emphasizing citizen involvement and a co-ordinated procedure.

Partial acceptance or outright rejection of resource management plans can be due largely to ineffective citizen involvement. Total citizen involvement often is impractical or even impossible. Too often, however, planning is carried on for, rather than with, people. Citizen participation often consists of an agency conducting a sales-pitch program of already-made decisions, rather than enlisting the actual, active participation of citizens in their formulation.

Most citizens are willing to leave technical details to the trained resource worker provided they feel that the professional is

working toward their goals and objectives; but citizens should be challenged to consider options, alternatives, and their consequences that might be new to them.

The number of citizens, groups, or organizations attending a resource management planning session often is measured to measure the quality of involvement. The number is an important item only when "none" versus "some" is being considered. It is the quality of input that really counts and this is usually related to citizen awareness of the problems and objectives and to the contributions citizens make to resolving problems. In most cases, a "few" is better than "too many." Experience has proven that not very much resource management planning is accomplished in a large public meeting.

The citizens invited to attend a resource management planning session should understand the concepts and purposes of resource management planning and be themselves major users of the resources in the area to be planned. It is difficult and risky to deliberately leave out someone. But doing so probably will have less adverse effect on the final plan than having the planning session degenerate into a public meeting.

As has been previously stated, land use planning involves topics for which general public opinion is important and broad public input is required. Resource management planning should be limited to those who are actually involved in the area to be planned. Project planning should involve the actual users of the project.

Among the citizens, groups, or organizations professing interest in resource matters are those who play the role of the extremists. Some seem to dominate public meetings where they can get publicity and have the apparent pleasure of agitating others and disrupting meetings. Such people are often labeled "environmentalists," which is not a good derogatory term, if one is desired—all good resource workers have concern for the environment and, therefore, they too are environmentalists.

One stated viewpoint is that the extremists will fall on his face when he is most needed because he has constantly probed his case too strongly. Whether or not this viewpoint will materialize will remain to be seen.

As irritating and obnoxious as some extremists are, it is the extremist who gives power to the moderator. Between the outer limits of nearly every conflict is a middle-ground, compromise situation which brings the moderator into power. Without extremes of conflicting viewpoints, needed changes might not occur.

Extremism also incurs obligation. It is not enough to be against something without recognizing alternative solutions and legitimate needs. Searching for and accepting these solutions is required on the part of extremists themselves. Very few cases are totally correct to the extent that compromise or alternatives can be ignored.

Resource management planning itself is a compromise. If we are willing to accept Nature's own dynamic succession, most renewable resources might be protected if left completely alone. However, it is worth noting that uncontrolled succession is a worthy topic. Is that what the public really wants?

Utilization of the resources—land, vegetation, animals, water—is based on the fact. There is no alternative to use. Resource conservation, by definition and fact, implies the rational use of resources for man's benefit with a minimum of environmental impairment. Use with preservation, not use versus preservation, is the real challenge. At the same time, natural areas preserved in perpetuity for various valid reasons obviously are needed by today's world.

Co-ordinated Resource Management Planning

This term represents a relatively new planning technique which embodies the concepts and purposes of resource management planning that have been discussed heretofore. The actual resource management planning should be done.

Co-ordinated resource management planning, as developed in Oregon in the early 1950's and then more fully developed during the past decade, has proven to be an effective and efficient procedure for achieving improved use and management of renewable resources. Its objectives are: to produce compatibility between the uses being made of renewable resources, including forestry, farming, watershed management, wildlife habitat and management, livestock grazing, and recreation; to

bring about improvement of the resources and maintenance in a desirable quality condition; and to create an optimal sustained flow of food, fiber, and other goods, services and benefits from such lands while at the same time protecting and enhancing environmental qualities.

This procedure is designed to handle simple or complex situations. The area selected for planning may consist of a forestry, ranch, or farm operating unit or a watershed, range, unit, stream corridor, wildlife area, or other type of area. It can be made up of public or private land only or of public and interdependent or interested private lands. It can occur in one block or in scattered tracts.

A co-ordinated resource management plan involves all of the ownerships of the planned area. All major uses of the area are taken into account and developed to avoid unresolvable conflicts. Uses such as farming, forestry, ranching, recreation, watershed, and wildlife are integrated into a single unified program for use and management consistent with land capabilities. The impacts of urban, industrial, and similar developments are also taken into account.

Each plan is developed concurrently by a group consisting of the principal land owners, resource managers, and users of the planned area who are the decision-makers during the planning process. Others less directly involved with the planned area may be invited to attend the planning session.

A special format has been designed to help the decision-makers set the major problems of the planned area, record their individual and collective objectives, and develop resource management systems that will resolve these problems and achieve their objectives. In this planning procedure, a candid exchange of viewpoints and experiences is required in order to arrive at a consensus and produce a decision made by the group or by an individual land owner or agency.

Co-ordinated resource management planning involves multiple expertise and judgement in different disciplines or subjects, which greatly adds to the potential accuracy of the decisions made during the planning process.

Each plan is open-ended in that it can be amended and changed when necessary. However, major changes would be made by the planning group and not by individuals.

Four Levels

Co-ordinated resource management planning is guided and conducted by more-or-less formal organization at four different levels: the interagency working agreement, the Executive Group, the Task Group, and the Local Planning Group.

As a first step, a memorandum of understanding between renewable resource agencies at the top level of administration provides the over-all setting under which this program is conducted throughout a country. In British Columbia, this memorandum is signed by the chief executives of Agriculture, Fish and Wildlife, Forest Service, and Lands Service. In the United States, it is signed by the chief executives of the Bureau of Land Management, Forest Service, and Soil Conservation Service and is endorsed by the President, National Association of Conservation Districts.

Next, co-ordinated resource management planning is guided at the top level within a Province or State by this organized group of agency administrators. In British Columbia, the Provincial Executive Group consists of the Associate Deputy Minister, the Assistant Chief Forester for resource management, and the Director of Range Division of the B.C. Forest Service, Assistant Deputy Minister and the Director of Land Management in the

Lands Service, the Associate Deputy Minister and the Assistant Director of Management and Development in the Fish and Wildlife Branch, the Associate Deputy Minister and the Director of Production and Marketing Services in the provincial Department of Agriculture. In Oregon, this group consists of State administrators for three Federal agencies (Bureau of Land Management, Forest Service, and Soil Conservation Service) and five State agencies (Extension, Fish and Wildlife, Forestry, Land Conservation and Development, Soil and Water Conservation).

The functions of the Executive Group are intended to be limited to the intra- and interagency conduct of the co-ordinated planning program within the State or Province and to bring the program to the attention of Government.

The Group reviews progress and problems, facilitates the program by providing for training and assignment of personnel, and considers staffing needs to achieve the desired rate of plan development and implementation. It establishes guidelines for determining priorities for co-ordinated planning in respect to other agency programs and otherwise achieves agency co-ordination and co-ordination throughout the area in which the program is being conducted. Meetings are held at least once annually to conduct these functions. A chairman is elected by the Group and this office is rotated annually. Representatives of appropriate industries, other agencies and groups may be invited to participate in these meetings at the discretion of the Executive Group.

Active leadership to co-ordinated planning of renewable resources is provided by the Task Group. British Columbia currently has five, one for each resource management region in which this program is being conducted. Oregon has one Task Group. Each Group should be interagency and interdisciplinary in make-up.

Each Task Group consists of representatives of the resource-oriented agencies, usually staff specialists who have been designated decision-making roles in management of renewable resources. Members have State-wide or regional responsibilities and considerable expertise in their current positions. Each member is appointed by the agency represented and, as such, is the official representative of that agency for the co-ordinated planning program. Agencies and disciplines represented on the Task Group may vary from State to State or region to region depending on the kinds of resources and their major uses.

The Task Group provides leadership, training, and special assistance, when needed, to local planning groups. It periodically reviews selected plans, monitors effectiveness and progress, and otherwise acts in a supervisory capacity for the co-ordinated planning program. It meets periodically to conduct these functions and to report to the Executive Group. The chairman is elected by the Group and this office is also rotated on an annual basis.

The functions of the Task Group are intended to be limited to intra- and interagency conduct of the co-ordinated planning program with a State or resource management region.

The core of the Local Planning Group, which actually does the co-ordinated planning, consists of the principal resource managers and users within the planned area who have decision-making authority. Task Group members also participate as needed to provide training or give special assistance. Agency representatives who are key participants in the local resources group must have the authority to make resource

management decisions for the agency (including the decision that additional consultation is needed with the Task Group, other staff specialists, or their administrators). All major changes in the plan, once it is completed and signed, should be made by the Local Planning Group. Otherwise, there is established an instable system of review by individuals who did not participate in the development of the plan, thus blocking progress, creating dissension, and causing repeated reworking of the Local Planning Group. In principle, co-ordinated planning eliminates unilateral decision-making, which often is the cause of unacceptable conflicts in resource use.



Developing the co-ordinated resource management plan for the near flat grazing allotment on the Washoe-Whitman National Forest and the ranches operated by the eight permittees. Local planning group consisted of the rancher-permittees, U.S. Forest Service and Soil Conservation Service. Timber, wildlife, watershed, recreation, and livestock grazing on both private and public lands were incorporated into one plan. Soil Conservation Service photo.

A number of local planning groups function simultaneously within a State or region. The make-up of the group changes somewhat from plan to plan because of a change in resource values or land owners.

Scheduling for co-ordinated planning is essential. Each agency and group has its own program of activities for which priorities are established. The development of each co-ordinated plan should be dovetailed into the activity schedule of each, if at all possible. This requires a reasonable amount of give-and-take between participants.

Assigning priorities for completion of co-ordinated plans also should take into account the need for making progress with resource management in situations where co-ordinated plans will not take place for some time to come. The co-ordinated planning technique is especially suitable for handling large, complex situations and those having major impacts on social and/or resource values. Therefore, such situations normally should be considered when assigning priorities to requests for co-ordinated resource management plans.

In addition to the underlines necessary for working together, guided development of co-ordinated planning of renewable resources during the past decade has evolved several significant

points that are appropriate in today's resource program.

There is a great need in resource management planning to give full consideration to the second and third order of consequences that likely will take place as a result of a planned achievement.

The "good top inch" of soil and similar basic resource considerations need to be revitalized because they are often forgotten in today's dollar-oriented resource management. There is no substitute for a sound, ecologically based resource inventory as the foundation for decisions governing management of all major resources of the planned area—land, wood, water, wildlife, forage—each of which should no longer be planned independently.

Concern for the environment and knowledge of cause-effect interactions in resource use have emphasized the need for combinations of measures, treatments and developments—RESOURCE MANAGEMENT SYSTEMS—instead of piecemeal application of practices.

Well-meaning but often misinformed, uninformed, unbalanced, or antagonistic persons and groups will exist in resource work. The ameliorating force that can be most effective in resolving this problem is face-to-face, rational exchange of viewpoints on objectives and alternatives—co-ordinated resource planning. The listening that occurs during this process is one of the most important things that happens. Individuals in planning groups may not have listened to each other heretofore.

If resource users, owners, and managers will collectively make resource management decisions and abide by them, the courts and politicians will not have to do this.

Summary

Resource management planning is an open-ended, continuing process. It is a decision-making process, not a forecasting device.

Planning must be done with people, not for people. The same planning steps are needed whether dealing with a single crop/land field, forest cutting block, ranching enterprise, watershed, stream corridor, or a complex of these and others. There is only a difference in the level of generalization that might be required to arrive at decisions.

Resource owners, managers, and users can and will think broadly and are anxious to work together for wise use of renewable resources.

Resource management planning must involve the physical, social, economic, environmental, and political welfare of the community—both rural and urban—it is to be accepted and put into effect.

Almost never does one agency, group, or discipline have all the answers or expertise needed. Teamwork, both public and private, is vital.

Resource management planning, done correctly, is not an easy academic exercise. It involves time, money, and hard work; reversals can be expected. But the rewards from actually developing and improving human and physical renewable resources are well worth the effort and trouble.

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United States Department of the Interior

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

IN REPLY REFER TO:
 1792
 (N-022)

April 21, 1980

Matt Morris
 Humboldt County
 Regional Planning Commission
 City/County Complex
 Winnemucca, NV 89445

Dear Mr. Morris:

Thank you for your comments concerning the Preliminary Scoping Document for the Paradise-Deno Environmental Impact Statement.

We will be happy to allow time for the Regional Planning Commissions comments and would like to assure you that they will be given full consideration when they are received.

We on the Winnemucca District fully support the concept of coordinated resource planning and are willing to work through this system to arrive at the best plans possible. I have looked at the articles you submitted with your letter and would like to thank you for sending them in.

Sincerely yours,

Vaden G. Stickley
 Acting District Manager



United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
 PACIFIC SOUTHWEST REGION
 SAN FRANCISCO, CALIFORNIA 94102
 450 Golden Gate Avenue Box 36062

IN REPLY REFER TO:
 PSW 200

APR 3 1980

MEMORANDUM

To: District Manager-Winnemucca District Office
 Bureau of Land Management

From: Chief, Federal Coordination & Landmarks Division

Subject: Paradise - Denio Management Framework Plan Step II (1120 N-022.3)

We have reviewed the listed recommendation and offer the following comments. Three areas of concern are addressed in our comments: Cultural resources preservation in livestock grazing and range improvement programs, National Natural Landmark sites, and the Nationwide Rivers Inventory in the study area.

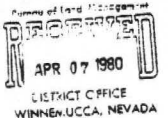
Cultural Resources

The draft environmental statement should include evidence of compliance with the Programmatic Memorandum of Agreement (MOA) between BLM, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers regarding the Livestock Grazing and Range Improvement Program. A copy of the MOA should be included in the draft EIS.

National Natural Landmark Program

A portion of the Black Rock Desert, which may be located in the management plan study area, is proposed for designation as a National Natural Landmark. Notification of proposed Natural Landmark sites was addressed to the Director, Bureau of Land Management on February 21, 1980.

A landmark brief and map for the proposed Black Rock Desert landmark are enclosed to facilitate consideration and planning for the protection of this valuable resource. The Fact Sheet attached explains the designation process and related protection responsibilities.



Nationwide Rivers Inventory

Both the North and South Forks of the Little Humboldt River have been included on the first phase of the Nationwide Rivers Inventory, as prepared by the Pacific Southwest Regional Office of the Heritage Conservation and Recreation Service.

In his Environmental Message of August 2, 1979, the President identified Federal land management agency responsibilities related to rivers included on the Nationwide Rivers Inventory. Final implementation procedures and copies of the Nationwide Inventory for the Pacific Southwest Region will be forthcoming in the near future.

Should you have any questions, please contact us at (415) 556-2480. Thank you for the opportunity to comment.

Lucas C. Lewis

Enclosures

THE NATIONAL NATURAL LANDMARKS PROGRAM**Fact Sheet**

America has a wealth of natural resources which constitute a rich and diverse natural heritage. National Natural Landmarks are among the best examples of this natural heritage.

A National Natural Landmark is a select portion of America's land and waters which is a unique and representative example of the Nation's natural history. National Natural Landmarks range from such famous areas as Mount Katahdin, Maine; The Great Dismal Swamp, Virginia; Point Lobos, California; Shishaldin Volcano, Alaska; and Okefenokee Swamp, Georgia, to other equally significant but lesser known areas. Taken together, National Natural Landmarks illustrate the array of terrestrial and aquatic communities, landforms, geological features, and habitats of threatened plant and animal species that constitute the Nation's natural history.

The National Natural Landmarks Program was established in 1963 by the Secretary of the Interior to encourage the preservation of areas that illustrate the ecological and geological character of the United States, to enhance the educational and scientific value of the areas thus preserved, to strengthen cultural appreciation of natural history, and to foster a wider interest and concern in the conservation of the Nation's natural heritage. The program was transferred from the National Park Service, which had administered it from its inception, to the Heritage Conservation and Recreation Service (HCERS) when it was created in January of 1978.

The mission of HCERS is to plan, evaluate, and coordinate the conservation of the Nation's natural and cultural resources, and to assure adequate recreation opportunities for all its people. One of the major responsibilities of HCERS is to assist in the conservation of a variety of significant natural areas which, when considered together, will illustrate the diversity of the Nation's natural history. This aim is realized through the identification and designation of National Natural Landmarks and listing them on the National Registry of Natural Landmarks, which is periodically published in the Federal Register.

THE DESIGNATION PROCESS

HCERS conducts studies of ecological and geological resources in the 33 natural regions (e.g. Appalachian Plateaus, Gulf Coastal Plain, etc.) of the United States, Puerto Rico, Virgin Islands, and Pacific Trust Territories to provide a logical and scientific basis for designating National Natural Landmarks. Each study produces a classification and description of the ecological and geological features of the natural region, plus a list of areas recommended for National Natural Landmark status.

These recommended areas are reviewed by ecologists and geologists and the appropriate HCERS regional office to assess their potential national significance. Their recommendations are forwarded to the central landmark staff located in the Mid-Continent Regional Office in Denver, where they are reviewed and submitted to the Secretary of the Interior for final approval and Landmark designation.

CONSIDERATIONS FOR NATIONAL SIGNIFICANCE

Landmark status is ascribed to areas which best illustrate or interpret the natural history of the United States.

Examples of this natural history include several types of ecological and geological resources: (1) terrestrial and aquatic communities, such as an ecological community that illustrates the characteristics of a biome, or a relict flora or fauna persisting from an earlier period; (2) geological features and land forms, such as geological formations that illustrate geological processes or fossil evidence of the development of life on earth; and (3) habitats of rare or restricted native plant and animal species.

Criteria for National Natural Landmark status are used to evaluate examples of the types of ecological and geological resources outlined above. These criteria include, but are not limited to, the following considerations: (1) how well the nominated example typifies the ecological and geological resources; (2) the present condition of the nominated example; (3) the anticipated long-term viability of the example as reflected in the size and quality of the surrounding natural area which contains it; (4) the defensibility of the example from detrimental outside influences; (5) the rarity of the type of resource represented by the example; and (6) the number of high quality examples of different natural resources which the area contains.

CONSERVATION OF LANDMARKS

In view of their national significance, it is important that the qualities of National Natural Landmarks be maintained.

Official recognition of an area in the National Registry of Natural Landmarks often stimulates its owner or manager to protect the area's nationally significant qualities.

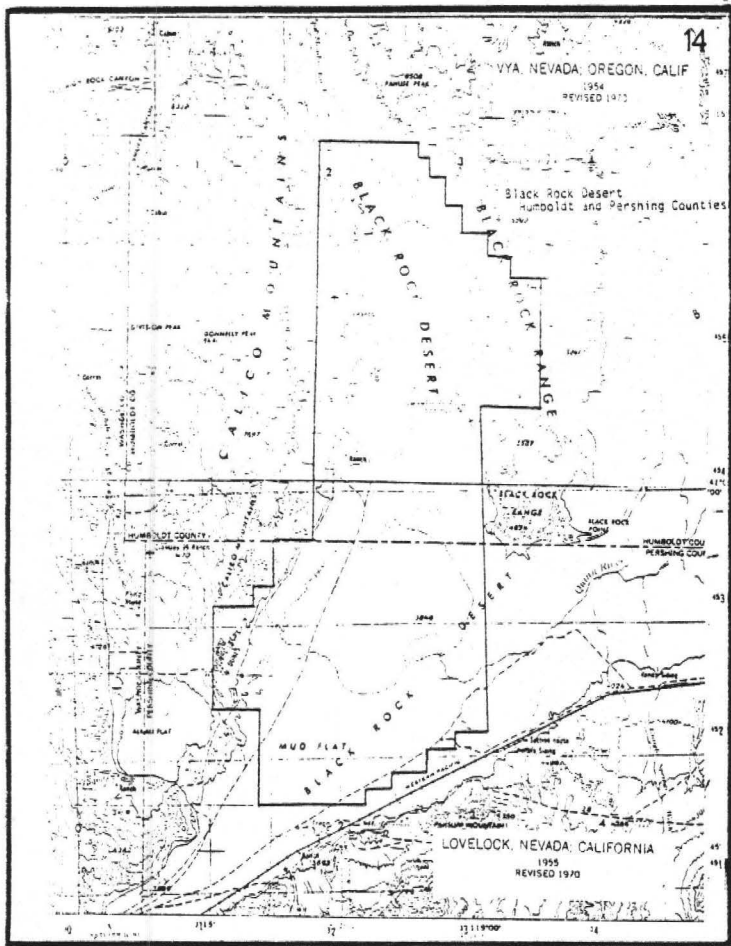
Indirect protection is provided by the National Environmental Policy Act of 1969, which requires Federal agencies undertaking major actions to file statements which detail the effect of such actions on the environment, including National Natural Landmarks. In addition, an

annual report to the Congress is prepared by HCERS which identifies those National Natural Landmarks which exhibit damage or threats to their integrity.

The owner of each newly designated National Natural Landmark is invited to adopt basic conservation practices in the use, management, and protection of the property. When this commitment is formally made, the area becomes a registered National Natural Landmark. The owner relinquishes none of the rights and privileges for use of the land, nor does the Department of the Interior gain any possessory interest in lands so designated. The owner may later receive a bronze plaque and a certificate which recognize the significance of the property.

For further information on the National Natural Landmarks Program, write to the Director, Heritage Conservation and Recreation Service, 440 G Street, N.W., Washington, D.C. 20243, or the following HCERS Regional Offices:

NORTHWEST	Regional Director, 915 Second Avenue, Seattle, Washington 98174; (Idaho, Oregon, Washington)
PACIFIC SOUTHWEST	Regional Director, Box 36062, 450 Golden Gate Avenue, San Francisco, California 94102; (American Samoa, Arizona, California, Guam, Hawaii, Nevada)
MID-CONTINENT	Regional Director, P.O. Box 25387, Denver Federal Center, Denver, Colorado 80225; (Colorado, Iowa, Kansas, Missouri, Montana, Nebraska, North Dakota, South Dakota, Utah, Wyoming)
SOUTH CENTRAL	Regional Director, 5000 Marble Avenue, N.W., Albuquerque, New Mexico 87110; (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)
LAKE CENTRAL	Regional Director, Federal Building, Ann Arbor, Michigan 48107; (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)
SOUTHEAST	Regional Director, 148 International Boulevard, Atlanta, Georgia 30303; (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, Virgin Islands)
NORTHEAST	Regional Director, Federal Office Building, 600 Arch Street, Philadelphia, Pennsylvania 19106; (Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, West Virginia, and the District of Columbia)
ALASKA	Area Director, Alaska Area Office, 1011 E. Tudor, Suite 297, Anchorage, Alaska 99503



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Natural Landmark Brief

- Site: Black Rock Desert, Humboldt and Pershing Counties, Nevada.
- Description: This 71,500 ha (176,600 acres) site is located in northwestern Nevada, about 90 km (60 miles) west of Winnemucca. Black Rock Desert is several arms of pluvial Lake Lahontan.

A prominent feature of the Black Rock Desert country is the vast alkali plain -- 30 km (20 miles) wide and 130 km (80 miles) long. At first sight, it is nearly featureless -- a level hardpan, without a blade of grass, that stretches to the horizon. Away from the playas and around the perimeter of the Black Rock Range -- where the soil is less saline -- greasewood helps stabilize the sand dunes. Sometimes shallow lakes form whose water has a composition similar to that of the surrounding area, which is highly saline. The water is evaporated, leaving an absolutely barren plain of mud, broken up by a polygonal pattern of sun cracks.

Another interesting feature of the playa is the white saline efflorescence which is formed by the crystallization of various salts brought to the surface in solution by the action of capillary attraction, and left as the water that dissolved them is evaporated. Incrustations of this nature sometimes cover areas many miles in extent, especially along the borders of the playas, and render the surface as dazzling as if covered by snow.

Black Rock Point rises abruptly 120 meters (400 feet) above the playa at the southern edge of Black Rock Range.

There are a number of thermal springs at the base of Black Rock Range, on the western side, whose water is at or near boiling point.

The Black Rock Desert, like other playas in the Great Basin, is a true desert and it is absolutely barren of vegetation. Saltgrass (*Distichlis spicata* var. *stricta*) grows around the springs, and greasewood (*Sarcobatus vermiculatus*) occurs in places around the margin of the playa. But no vegetation invades the playa for any distance.
- Owner: U.S. Government; administered by the Bureau of Land Management, Winnemucca District, Nevada; and Private.

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- Proposed by: Vernon B. Bostick, et al., "Inventory of Natural Landmarks of the Great Basin", 1975.
- Significance: Black Rock Desert is the most expansive, silt-clay playa within the Great Basin. While playas are a common feature throughout the region, other great playas (e.g., Death Valley and Big Smokey Valley) are examples of salt playas and, hence, are mineralogically and scenically different. As outlined, the site includes marginal sand dunes and small seeps, both of which are regular associates of the larger playas of the region. A number of thermal springs add to the significance of the area. The overwhelming feeling of isolation and solitude a visitor can experience from its vastness and lifelessness adds to the qualities of Black Rock Desert: it is America's equivalent of Arabia's Empty Quarter.
- Land use: Formerly a U.S. Naval Gunnery Range, the playa now supports small amount of grazing -- primarily near the springs which are privately owned. History buffs enjoy the region, while recreationists enjoy the solitude. A small amount of land in the vicinity of the springs near Black Rock Point is reserved for ditches and/or canals.
- Dangers to integrity: Apparently, the only threat to the integrity of Black Rock Desert is its possible future use as a site for capturing geothermal, wind and solar energy.
- Special conditions: None known.
- Evaluated by: G. William Fier, University of Nevada, Las Vegas; Ted L. Hines, California State University, Fullerton; Kimball T. Harper, Brigham Young University; Jim Holland, National Park Service, Denver; and Peter G. Sanchez, National Park Service, Death Valley National Monument.

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IN REPLY REFER TO
1792
(N-022)

United States Department of the Interior

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

April 22, 1980

U.S. Department of the Interior
Chief, Federal Coordination & Landmarks Division
Heritage Conservation & Recreation Service
450 Golden Gate Avenue, Box 36062
San Francisco, California 94102

Dear Sir:

Thank you for your comments concerning our Management Framework Plan Step II for the Paradise-Denio Resource Area. In answer to your questions about cultural resources, national landmark program, and nationwide rivers inventory, we are aware of the particular situation in each of these concerns and we will take due consideration when the land use decisions are made. We appreciate the information that was enclosed.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



HUMBOLDT COUNTY
REGIONAL PLANNING COMMISSION

CITY/COUNTY COMPLEX • WINNEMUCCA, NEVADA 89443
(702) 683-3061

May 9, 1980

Mr. Vaden Stickley
Acting District Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445



Attn: Mr. William Harkenrider

Dear Mr. Stickley:

The Humboldt County Regional Planning Commission has discussed the proposed Management Framework Plan - Step II (MFP II) and the Scoping Document for an Environmental Impact Statement (EIS), both of which pertain to the Paradise-Deno Area. We have also assigned a sub-committee to do further research, and discuss various facets of the plan and scoping document with BLM personnel. As a result, we are offering comments in four basic areas:

1. The Scoping Alternatives
2. The Methodology
3. Implementation
4. Public Information

1. The Scoping Alternatives

In summary, it is our considered opinion that:

- a. Alternative E ("Reduction in Livestock Grazing to a Level that is 40-50 Percent Below the Proposed Action") is inappropriate. This is because the proposed allocations are a 50% drop (in many cases) and a further 50% would mean a 75% decline. The proposed action itself answers the intent of this alternative quite handily.
- b. Alternative F ("Elimination or Adjustment of Allotment Boundaries and Equal Grazing Reductions for All Users") should not be included because it is almost unworkable, given the implementation costs (staff and funding) it would generate, along with litigation.
- c. A modification of Alternative C ("Maximizing Livestock Use Through Management and Development") should be entered into the scope of the EIS. In this manner, the prerequisites of environmental evaluation and clearance would be met, so as to allow decisions and actual implementation of Coordinated Resource Management Planning (CRMP)--as per the Bill Anderson/Oregon approach. Use of that method may cause a higher number of Animal Unit Months (AUM's) to be allocated to livestock, through intensive and detailed plans followed-up by proper management.

It would be a shame if this type of approach, and its beneficial results, were limited or prohibited by NEPA-based procedure hang-ups or inadvertent oversights.

2. Methodology

- a. There is a need for the Bureau of Land Management to work closely with the ranchers and other user and interest groups. The Oregon model of CRMP, as explained and advocated by Bill Anderson and about to be endorsed by the Nevada Advisory Committee for Multiple Use of Federal Lands, appears to be a desirable process for conducting this.

The orientation and policy of Mr. Spang, to maximize discussion, negotiation, and cooperative agreement/disagreement, should allow CRMP to work here.

There needs to be more "on the ground" examination of range conditions by the BLM and ranchers working together.

- b. There needs to be a greater refinement (in the field) of range survey information, upon which MFP II was based.
- c. One example, is the concern that adjacent plots of private and public land should receive equal amounts of AUM allocations, when there is identical or similar vegetative types and conditions.
- d. Another example of this, and an item of concern and constructive criticism, is the policy where range land with a slope greater than 50% is not counted for calculating forage, allocating AUM's, etc. This is not considered realistic ("the cows don't know that"), nor practical in the allocation of AUM's, which MFP II proposes to shrink in a draconian manner. The 50%+ slope policy must, in our opinion, be relaxed to more realistic "rules-of-thumb". Otherwise, there will be rapid depreciation of Bureau credibility, with all the attendant side-effects of such a loss.

3. Implementation

- a. Greater control of pests:
 - i. Grasshoppers (we believe this is a major issue, not one of lesser importance, as proposed in the scoping document.)
 - ii. Ground squirrels
- b. More seedings
- c. More sprayings
- d. More funding. Without adequate funding for maintenance and intensive implementation, all of the planning, cooperation, and agreement, etc. between local government, user groups, special interests and the BLM goes for naught.

Non-implementation of plans prepared at great cost is, in our minds, as futile as acquiring an expensive car, but never putting in enough gas to go anywhere. We believe that effective user-BLM cooperation depends on properly thought-out and properly funded implementation.

Without adequate implementation funds, the Bureau might be perceived by some persons as a CETA-type program allocated to the Department of the Interior, instead of the Department of Labor. We think it would be in everyone's interest if the BLM received more implementation funding.

4. Public Information

It is apparent that the BLM has been hit, and hit hard, by public pressures from all sides. The Bureau's position might be assisted by more dialogue with the state and local community which could perhaps lend assistance as needed and appropriate.

- a. We believe it would be appropriate to have regular meetings between the BLM District and Area staff, and our Regional Planning Commission:
 - i. We believe it would be appropriate to allocate 10-30 minutes for the Bureau at our "Special Meeting", held the second Thursday of every month at 7:30 p.m. The Special Meeting is when we discuss plans, ordinances, policies, etc.

This type of regular communication regarding current BLM activities, proposed and upcoming plans, etc., will help in fostering more two-way communication (twelve Planning Commissioners have many contacts in the community, and are almost always asked about Bureau proposals, etc.).

If certain matters suggest more involved feedback, the Planning Commission could schedule a public hearing at their "Regular Meeting", which is held on the last Thursday of the month, in the evening.

- ii. We would suggest beginning at our Special Meeting of June 12, 1980. Perhaps the meeting could be held in the Bureau's meeting room, with your staff giving the Planning Commission a detailed presentation on MFP II, and the rationale for arriving at the points contained there.
- iii. Based on the discussion at that meeting, the Planning Commission could prioritize those items which BLM Staff could discuss at succeeding "Special Meetings" over the next few months.

- b. Informing the local area (via Planning Commission meetings, the media, etc.) about pressure and suits being brought against the local and state BLM offices. In this way local support could be generated via resolutions, Congressional liaison, amicus briefs in WRDC-type suits, etc. It may, perhaps, be in the best interest of our area, if suits were filed to assist the BLM, when outside groups seek judicial manipulation of the Bureau, for decisions that would harm our local economy and its life style.

In conclusion, we have concern about

- a. the scoping alternatives (request elimination of Alternatives "E" and "F", while adding NEPA-EIS coverage for a Coordinated Resource Management Plan, which may raise the number of AUM's to be allocated);
- b. the methodology for the MFP II and EIS process;
- c. the great need for implementation (funding and relaxation of artificial judicial constraints); and
- d. local public information activities need to be undertaken so as to allow a better exchange of ideas, greater understanding between residents and Bureau staff, and pave the way for more cooperation.

Sincerely,

HUMBOLDT COUNTY REGIONAL
PLANNING COMMISSION

Joseph L. Gough
Joseph L. Gough, Chairman



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

May 19, 1980

Joseph L. Gough, Chairman
Humboldt Regional Planning Commission
City/County Complex
Winnemucca, NV 89445

Dear Mr. Gough:

I would like to thank you for your letter of May 9 concerning our Management Framework Plan and EIS process. We found your comments to be very constructive and helpful. I sincerely hope that we can continue to build a high level of communication between the Bureau and the people of Humboldt County through the Planning Commission.

Your letter of May 9 addressed four basic areas.

1. Scoping Alternatives
2. The Methodology
3. Implementation
4. Public Information

This was very helpful and allowed us to easily work your comments into our EIS process.

1. **Scoping Alternatives** - As you recommend Alternative E (Reduction in Livestock Grazing to a Level that is 40-50 Percent Below the Proposed Action) and Alternative F (Elimination or adjustment of Allotment Boundaries and Equal Grazing Reductions for All Users) have been dropped and will not be analyzed in the EIS.

Coordinated resource management planning will be an important consideration throughout the EIS process. The coordinated planning process will be considered in all of the alternatives including the maximizing livestock alternative. We are assuming for analysis purposes that Coordinated Resource Planning will occur.

2. **Methodology** - All of the suggestions you make under methodology will be used. We will work closely with the ranchers, users, and interest groups. We plan to look on the ground at each allotment with the ranchers this summer. We will go over and refine the range survey with them at that time. Adjacent plots of public and private land will be given equal allocation when they are in the same vegetative types.

The suitability criteria will be looked at on an allotment by allotment basis as the Coordinated Resource Plan is formulated. There may be instances where exceptions to this criteria will be allowed but this will have to be evaluated on a case by case basis.

3. **Implementation** - We will treat the items you listed (Bait Control, Seedings, Sprays) as significant issues in our EIS process.

Funding for Implementation is very important. We are optimistic that our projects will be funded if they are called for in a sound management plan.

4. **Public Information** - We are very much interested in creating a better dialogue with the state and local community and feel that your suggestion to allocate 10-30 minutes at your special meeting the second Thursday of each month is an excellent one. We will be happy to have your June 12 meeting here in our District Conference Room. I will make all the arrangements for Bill Harkenrider and the district staff to give you a detailed briefing on the Paradise-Denio MFP II at that meeting.

I feel that your suggestions are a good beginning for breaking down the communication barriers that exist between the local community and the Bureau.

I would appreciate your confirmation of the June 12 meeting date at your convenience and look forward to working with the Planning Commission.

Sincerely yours,

Robert J. Neary
Acting District Manager

SMITH & GAMBLE LTD.
ATTORNEYS AT LAW

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

502 NORTH DIVISION STREET
CARSON CITY, NEVADA 89701
TELEPHONE (702) 883-1800

March 27, 1980

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

Re: Paradise-Denio Management Framework Plan
Step III - Comments

Dear Sir:

Please consider this letter formal comments on your Area Managers Recommendations for the Management Framework Plan Step II for the Paradise-Denio Resource Area. These comments are made without benefit of seeing the actual recommendations and are based upon the circular distributed by your office and the presentation made by Mr. William Harkenrider and others to the State agencies on March 4, 1980.

On October 19, 1979, I made specific comments to William Harkenrider concerning his recommendations on the MFP II as they relate to Pine Forest Land and Livestock Company allotments. I have not received a reply from Mr. Harkenrider to know if any of those comments were incorporated in his recommendations or not. I have enclosed a copy of that October 19, 1979, letter with this letter and hereby incorporate those comments herein as if fully set forth in this letter.

The headings I have used in my following comments are in reference to the headings used in the brochure distributed by your office. My comments are as follows:

Planning

You indicate that the Area Manager and his staff have gathered inventory data on each resource, explored resource opportunities, applied legal constraints and finally identified and resolved conflicts among the resources. At the scoping meeting in Carson City, Mr. Harkenrider indicated that he had not read the Court's Order in the American Horse Protective Association vs. BLM case. It would seem that the decision of the Court in that case that directly relates to Mr. Harkenrider's resource area would be extremely relevant in applying the legal

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constraints referred to in your brochure. I would recommend that the U.S. Justice Department and the Area Manager meet for the exclusive purposes of reviewing that legal Court decision before embarking on any land use decisions in the resource area concerning wild horses.

There are also several other Court decisions that directly relate to the management of the land in this resource area that should be reviewed by Mr. Harkenrider and the Justice Department before reaching any management decisions concerning this grazing unit. These decisions are commonly known as the Leo Sheep Case (which arose in Wyoming and was appealed to the U.S. Supreme Court), the New Mexico vs. U.S. case concerning water rights which was decided by the United States Supreme Court and the pending cases in the U.S. District Court in Reno wherein the State of Nevada vs. the BLM concerning both desert land entries and management of wild horses. The Area Manager's recommendations clearly reflect that he has not been properly briefed on these legal constraints and potential legal constraints in making his management recommendations.

The BLM Planning Process

It was revealed at the March 4, 1980, meeting that the Area Manager and the BLM staff would consider both oral and written comments received at the various scoping meetings scheduled. At the meeting I attended, however, there was no method used for recording the comments of the speakers so that they could be integrated in the management decisions. Mr. Harkenrider reflected that he would remember the comments. I recognize that man is fallible and that if Mr. Harkenrider does not remember the comments or live to record them, the thoughtful comments of the persons participating in the scoping meeting would be lost forever.

It would also be helpful if the public could be informed of any changes the Area Manager may have made since the initial disclosure of any proposed recommendations last August. It would be a substantial waste of resources to require the public to comment at this time on early recommendations that have been modified by the Area Manager.

Lands

Item 3 indicates that the Area Manager recommends transfer of land for recreation and public purposes as needs are identified by local government bodies. I am aware that Humboldt County has requested on two separate occasions over the past several years lands in the Blue Lake area of The Pine Forest Range for establishment

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of a park. These requests have been denied for various purposes. I am pleased to see that the policy will be to transfer land for recreation and public purposes as the needs are identified by the local government bodies. I would hope that the BLM would adopt a policy of cooperation with the local government bodies rather than the previous posture in this regard. I feel that if the local governmental bodies are willing to develop recreation areas they should be allowed to do so rather than the B.L.M.

I would recommend that before utility right-of-way corridors are designated that input be solicited from the various utilities that may wish to establish corridors across the resource area. I would also hope that the utility corridors not be established adjacent to Interstate 80. As a Nevadaan I feel that the millions of travelers that pass through Nevada on Interstate 80 should be spared the unsightly appearance of a power line adjacent to the road when there are so many routes that power lines could take without impairing the landscape.

I would recommend that input be solicited by the Area Manager from all present users of communications rights to explore the feasibility of sharing existing sites.

Minerals

Your circular implies that only the Jackson, Eugene, Osgood and Montana Mountain Areas have potential for mineral developments. At the March 4 hearing, however, Mr. Harkenrider indicates that there were several other areas in the resource area that were such that no land use decisions would be made that would interfere with a potential mineral development. I would encourage that the Nevada Bureau of Mines, Nevada Mining Association, U.S. Bureau of Mines, Mackay School of Mines, and the Exploration Geologist in Nevada be consulted regarding identifying areas of potential mineral development in the resource area before the list of areas is completed.

I feel that before the BLM undertakes to eliminate any hazards related to past mining activities that notice to the owner of the claims where the alleged hazards occur be made and that the framework for eliminating these hazards by the State law be employed rather than an additional level of regulation or law.

It is my understanding that in addition to the community material sites indicated in the brochure that there will be designated material sites for both the State Highway Department and the County Road Department. I would also recommend that community

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material sites be developed within a 10 mile radius of any ranch that is more than 10 miles from any of the indicated towns or communities. If material sites are available within 10 miles to the people of a community, it would be unfair for there not to be a material site available to the people that don't live within 10 miles of those communities. Suggested locations for additional community material sites would be Kings River Valley, Bottle Creek, Leonard Creek, Paiute Meadows, Davey Town, Desert Valley, Jackson Creek and Eden Valley.

I feel a 5 mile buffer strip which in effect is a 10 mile strip of land for the Applegate Lassen Emigrant Trail is much too wide to achieve the objectives of establishing a buffer strip. I also feel that the circular is misleading by indicating it is a 5 mile buffer strip without indicating that it would be 5 miles on either side of the Emigrant Trail as indicated to the group on March 4, 1980.

Wild Horses & Burros

I feel that the wild horses and burros should be managed at the 1971 level and that no area of the resource area be designated exclusively for wild horses. I also feel that it is unrealistic to think that you can maintain the horse numbers at 600 by reducing them to 450 every five years. I believe biological information on the horses will reveal that they multiply much faster than that. I do commend you, however, for proposing to remove all horses from all areas except the Owyhee spring range. I foresee that it would be impossible to manage the horses on the checkerboard patterned lands to keep them off the private lands and therefore illegal.

Watershed

The recommendations appear to limit the control measures for big sagebrush to burning. I would suggest that plowing and spraying also be considered as methods of controlling big sagebrush. I would also recommend that greasewood and rabbit brush control be considered.

Wildlife

Under Paragraph 1d you propose to protect waters in crucial wildlife use areas. I strongly oppose any "protection" or any other management of waters by an agency of the United States of America. It is my view that the waters are in the exclusive jurisdiction of the State of Nevada.

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In Paragraph 2 you propose to develop a waterfowl habitat in the Quinn River Lakes area. If this development would include any interference with downstream water rights, I strongly oppose it.

In Paragraph 3 you propose to prohibit on the public lands the use of poisons with secondary killing effects. I am aware that there are poisons with secondary killing effects that do not have such secondary killing effects when properly administered and managed. I oppose a blanket prohibition of these poisons if they can be administered and managed to avoid secondary killing effects. I am aware that predators are on the verge of putting the sheep industry in Nevada out of business and seriously cutting into the income of the cattle industry.

I would recommend that there be public hearings and direct user involvement before any area is designated a bighorn sheep range and that no bighorn sheep range be designated that would have any effect on present use of the range.

You refer to reintroduction areas for bighorn sheep in Item 6. I am unaware of any native bighorn sheep areas in the Paradise-Denio Resource Area. I would want to see convincing empirical data that would establish that there have been bighorn sheep in an area before any "reintroduction" of sheep into an area. You also refer to "Bureau roads". It is my understanding that all "Bureau roads" that are open to the public are "public roads" and that these roads will remain forever open to the public.

I strongly oppose any closure of roads in the Pine Forest area for the purpose of creating a roadless area. In fact I oppose any closure of roads in the Paradise-Denio Resource Area for the purpose of creating a roadless area. It is my view that any roads that are open to the public and have been so open to the public are public roads and not within the jurisdiction of the Bureau of Land Management to close.

In regards to the Pine Forest road closures it is my view that there are several alternatives much preferable to closing the roads to achieve the objectives of the BLM. The BLM has dispatched personnel to police the closure on Pine Forest. These personnel could just as easily insure proper use of the areas by vehicles and visitors so that all visitors could enter the areas. The road to Blue Lake was constructed for the purpose of allowing fish planting and access by persons unable to hike over the mountain. In the same area there is Leonard Creek Lakes who are not served by a road and would afford a backpacker a wilderness experience. There is no reason that Blue Lake could not remain assessable to vehicles while persons wishing a

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more primitive wilderness experience can hike over the mountain to Leonard Creek Lakes.

Cultural Resources

It would seem unrealistic to me to preserve all "Basque aspen carvings" in view of the fact that the aspen tree is a rather short lived tree and in view of the fact that aspen carvings are being made on a continuing basis by most people that visit the area. It appears to me that a much better method of preserving the cultural resource would be an inventorying of the carvings by photograph without any additional level of government regulation that attempts to preserve something that will shortly die or be altered by subsequent visitors.

In Paragraph 2 you indicate that you wish to preserve a representative sample of line shacks and other isolated historical structures. At the meeting in Carson City on March 4, 1980, you admitted that your office had destroyed McCulley's Cabin located at the head of Snow Creek. Contrary to your representations to the group in Carson City, it is my belief that McCulley's Cabin had as many or more historical characteristics than any structure in the resource area. The cabin was a log cabin constructed of quaking aspen with a thatch and sod roof. It seems to be hearsay for the Bureau of Land Management to in 1980 say that they wish to preserve isolated historical structures when only two years earlier they maliciously destroyed a most representative example of isolated historical structures.

I cannot comment intelligently concerning subparagraph 3 without knowing what major "cultural sites" that you are referring to and without knowing what you propose to do to "attempt to prevent degradation".

Range Management

The cookbook method of surveying the range that I am aware of in this resource area is totally faulty. State and National administrators of the Bureau of Land Management have commented on various occasions of public meetings that range suitability criteria will not be applied in surveying the range if the range is in an improving trend. Local range scientists as well as State and National BLM administrators have repeatedly admitted that they do not have sufficient data on the Nevada ranges to determine what the trend is. Nevertheless Mr. Harkenrider at the presentation in Carson City admitted that in some allotments of this resource area the range was in an improving trend. He also admitted, however, that the range suitability criteria have been applied to all allotments in his resource area. This local

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policy of conducting range surveys is totally inconsistent with the stated policy of the National and State administrators. It would seem that the policy of a National and State administrators is the best approach in managing range lands. It would seem extremely important that if a range is in an improving trend that no adjustments whatsoever should be made to the ecology of the area for fear of disrupting that trend. Any artificial input to an ecosystem by man when the range is in an improving trend could have devastating affect on the entire ecosystem.

I have not received satisfactory explanation why the range surveys conducted in the mid-60's that indicated the appropriate number of AUM's for the livestock were 243,000 and now with the application of the highly questionable range suitability criteria and other "modern" range survey methods the recommend carrying capacity has shrunk by nearly 50% to 110,000 AUM's. Could it be that the recent surveys rely too heavy on the ocular recurrence.

I would recommend that:

1. That the Bureau of Land Management disregard the recent range surveys that apply suitability criteria.
2. Arrange individual meetings between the Area Manager, the Range Survey staff and the users of the allotment to exchange information concerning the present use of the allotment and the ultimate goal that the BLM seeks to achieve by resurveying the range. At this meeting the range users should also become informed as to the various alternate methods of surveying the range so that a method can be used that would be best suited for the range to be surveyed.
3. Conduct an initial survey of the range in consultation with the range users, the State and Federal wildlife managers and all other persons concerned with the use of the range to establish the present range trend. All available data should be assimilated in reaching a decision as to the current trend of the range including a comparison of the productivity of the range for both wildlife and livestock past and present. It would seem that the entire range survey process could be short-circuited if it was found that the range was in an improving trend. The logical alternative for range that is in an improving trend is to do nothing.
4. Conduct a new range survey in consultation with the users of the range on ranges that show a declining trend.
5. Key plant species should only be determined after consultation and a consensus with the historical users of the range as to what in fact are the key plant species.

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It seems unscientific to me to make a blanket statement that you could allow complete conversion of cattle to sheep or any combination thereof on any allotment. It would seem that because of the differing types of forage the two classes of livestock consume that some ranges would be more suitable for one class of livestock than the other. To allow such a complete conversion across the board on all allotments completely ignores any range survey data.

I would strongly recommend that the BLM immediately establish trend study plots throughout the range as should have been done in 1963 when the last surveys were completed. It would be a travesty if in 15 years the BLM staff were to come back to the public and again say that they do not have any reliable evidence of trend on the range.

Wilderness

The BLM should avoid designating any area as a wilderness study area until it has directly solicited input from each and every user known to it of the area, including but not limited to oil and gas lessees, geothermal lessees, grazing permittees and mining claim owners. Staff personnel should be dispatched to each proposed wilderness study area to determine if there are in fact all of the wilderness characteristics required by the BLM criteria. It appears obvious that staff people are not aware of the criteria or are disregarding them in examining the areas. If access points as referred to in the brochure are roads, it seems inconsistent to put up a sign at a road that says "Beyond This Point This Road is in A Road Area."

Fire

The BLM fire management program cries for a total rethinking. Before man, lightning started fires that burned until all of the fuel was consumed. This is part of the ecological balance of the range. Rather than immediately extinguish range fires they should be allowed to burn to their logical conclusion. The fire management program should focus on protecting combustible personal property rather than immediate suppression that usually results in greater and more long lasting scars on the terrain than the fire itself.

Fire control crews should be dispatched to various areas of the resource area and given specific range improvement projects to engage themselves in. This method of disbursing the fire control crews would accomplish three distinct purposes. First, the Government and the range would receive positive benefits from the wages paid the young people hired for fire control.

Bureau of Land Management
Page 9
March 27, 1980

Second, the crews would be dispatched so that they could more quickly respond to scattered fires and so that they could more quickly identify scattered fires. Additional assistance could be summoned by radio. Third, the BLM would accomplish positive public relations by having the young people of the fire control crews out and visibly engaged in productive activities rather than sitting around the yard playing cards.

Water

I strongly oppose any acquisition of water rights by the United States of America for any purpose whatsoever. It is my view that the water rights for the livestock watering should belong to the owner of the livestock as indicated in the New Mexico case. It is also my belief that the water for watering wildlife if necessary to be quantified by any agency should be quantified by the State of Nevada and not the Bureau of Land Management.

Areas of Critical Environmental Concern

There should be no such areas designated without first specific written notice to each user of the area including but not limited to geothermal lessees, oil and gas lessees, grazing permittees, mining claim owners, cities and counties affected. After specific written notice to each of these users, public hearings should be conducted in the area with broad based public notice before any of such areas are designated.

Activity Plans

The interdisciplinary resource teams referred to I assume consist of an assortment of individual human beings. Before any team member is permitted to participate in developing these plans he should be required to go through an orientation program that would require his introduction to each of the users of the area and the County Commissioners so that they can know who are on these resource teams and how to contact them for the purpose of imputing information.

Respectfully

Julian C. Smith, Jr.
JULIAN C. SMITH, JR.

JCS:sr
Enclosure

cc: Honorable Howard W. Cannon
Honorable Paul Laxalt
Honorable James Santini
William Macdonald
Pete L. Bengochea
Sammye Ugalde
Alan E. Beck



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 25, 1980

Julian C. Smith, Jr.
Smith & Gamble, Ltd.
502 North Division Street
Carson City, NV 89701

Dear Mr. Smith:

Thank you for your comments concerning the Paradise-Danilo Management Framework Plan Step II. I would like to assure you that your ideas and comments along with all others, will be considered in any land use decisions that are eventually made on this district.

I have recently become aware that you are involved with promoting the concept of Coordinated Resource Planning. I would like to assure you that the Winnemucca District fully supports this concept and is interested in working through this process to arrive at the best mutually acceptable action plans possible.

The Area Manager's recommendations are the result of a rather lengthy process. Each resource specialist on the district gathers as much information from all sources as he can about his particular resource. He then gives to the Area Manager a set of reasonable but "selfish" recommendations that he would like to see implemented for his resource. The Area Manager then takes all of these recommendations and attempts to resolve the conflicts between them. The Area Manager's Step II recommendation is the result of this conflict analysis.

If you wish I will ask the Area Manager to discuss any of his specific recommendations with you in detail.

Sincerely yours,

Vaden G. Stickley
Acting District Manager

cc: State Director, Nevada



STATE OF NEVADA
GOVERNOR'S OFFICE OF PLANNING COORDINATION
CARTON CITY, NEVADA 89701
(702) 885-6665

April 10, 1980

Ed Spang
State Director
Bureau Land Management
Nevada State Office
Federal Building Rm 1009
100 Booth Street
Reno, Nevada 89505

RE: SAI NV # 80200034 Project: Paradise Denio Scoping

Dear Mr. Spang:

Attached are the comments from the following affected State Agencies: Departments of Agriculture, Wildlife, and Energy and the Divisions of State Parks and Conservation Districts 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
Mike Nolan for
Robert M. Hill
State Planning Coordinator

RMH:md
Enclosures

STATE CLEARINGHOUSE COMMENTS ON SAI NV # 80200034 Paradise - Denio Scoping

Dept. Agriculture

We need additional data. We'd like to see copies of survey data and results, particularly, the data upon which the trend decisions were based. We believe that severe livestock reductions are unnecessary and are too much to allow the livestock industry to survive in the area. We further believe that the suitability criteria was arbitrary and unscientific. We will provide further comments as the requested data is available for review and study.

Division of State Parks

see attached

Dept. Wildlife

see attached

Division of Conservation Districts

see attached

Dept. Energy

Development of alternate energy sources to lessen the impact of today's energy crisis, should be one of the goals of federal, state and local governmental entities. It is imperative that the BLM give priority to the development of any geothermal resources on any land that it administers. This priority should be accomplished by: 1) completing any environmental work necessary as soon as possible, 2) removing institutional barriers in the way of geothermal development, 3) resolving land use conflicts between geothermal development and other activities, and 4) leasing of now unleased geothermal tracks.



MEMO

TO: Roland Westergard
FROM: Jay Meierdieck
SUBJECT: PARADISE-DENIO EIS AND MFP SCOPING DATE: March 13, 1980

DIVISION OF STATE PARKS

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

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

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

The proposed Desert National Scenic Trail would impact a corner (northwest) of the Planning Unit. The Desert Trail is a significant part of the Nevada State Trail System, being one of three cross-state trails and the only foot-equestrian trail. The exact routing is not finalized, but the MFP and EIS should further refine a corridor. The route currently proposed would enter Nevada at Denio and then go west into the Sheldon National Wildlife Refuge, possibly at Thousand Creek Gorge or Highway 140. The total distance in the Planning Unit would be approximately 12 miles.

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

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

RECEIVED
MAR 17 1980

Department of Conservation
and Natural Resources

A DIVISION OF THE DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Paradise-Denio EIS and MFP Scoping
Page 2

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

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

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

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

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

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

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

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

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

JM:ew

MILAN D. WATKINS
Director
Department of Conservation
and Natural Resources
Jean Mirau
Administrative Officer

ROBERT LEST
Governor



Address copy to
17
Division of Conservation Districts
201 South Park Street
Nye Building—Carson City
Carson City, Nevada 89701
Telephone
(703) 882-2444

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF CONSERVATION DISTRICTS

March 18, 1980

MEMORANDUM

To: Peter G. Morros, Assistant Director
From: Dean Mirau, Administrative Officer *DM*
Subject: Clearinghouse Review Project: Paradise-Denio Scoping

It is apparent that considerable attention is being given to the E.I.S. in the Paradise-Denio district. However, the attention is from one point of view and with a decided determination to follow through with plans conceived to be feasible, functional and to the best interest of all concerned. In reality, the scoping information reveals a certain amount of shortsightedness and a considerable amount of assumption. To begin with, the proposal allows for six alternatives which show extremes in activity in some cases and ineffective activity in others. The reduction in livestock grazing, as an example, would deal a crushing blow to the economy of not only the rancher, but the community as well. No livestock grazing would simply mean the end to ranching for several marginal ranchers who just make it as is, and considerable hardship for the others.

The objections to major issues found in the document and in the presentation given March 4, 1980 in Carson City are outlined in the sentences that follow.

An assumption has been made, based on studies not revealed in the document or at the meeting, that eliminating grazing in the months of April and May will restore lost vigor and growth to forage. Or, conversely, that to graze livestock during April and May retards useful forage production and growth stimulation. If either of these assumptions has a sound basis it has not as yet been revealed to the public. Furthermore, if it were to be true in one or two isolated cases, is it to be a practice to assume it to be true in all cases and therefore applied carte blanche to all acreage in question? The two months in question are prime grazing

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Peter G. Morros
March 18, 1980
Page 2

months in the spring and an ideal time to utilize the natural seed dispersal and planting facilitated by grazing cattle as well as the natural organic fertilizer it produces.

The suitability criterias are also questionable in light of grazing habits which differ with cattle breed and varying environmental factors. Not all cattle require water to be within a four mile radius of grazing. In some cases grazing from water sources may take place to much more than four miles. The slope of the land may not in all cases prevent cattle from grazing on 50% or greater slope conditions. It is also suspect that the thirty two acres per 1000 acres uniformly to all breeds of cattle under all circumstances. And finally, the erodability of some areas may be more susceptible without grazing and may even be more detrimental than with grazing cattle present.

When confronted with an increase in grazing fees and a reduction in allotment, some ranchers say, and in all probability will, suffer a loss in revenue which affects more than just the rancher himself. Alternate methods of feed procurement will necessitate a rancher's reassessment and reappraisal of the worth related to a continuation of his operation in the face of such an adversity. The simple economics of the situation dictates the rancher's next move, which in all probability is beyond his reach and in time will be beyond his influence, necessitating an alternate course of action in order to ensure his livelihood.

The allotment proposals are too severe and in some cases even detrimental. Allotment reduction combined with an economic hardship (inflation, feed costs, alternate land use costs, etc.) will surely drive some ranchers completely out of business. This is contrary to Federal legislation and original intent in grazing and land use acts. The rancher in many cases has done more for improving the land while ensuring forage for his cattle than if no grazing took place at all. The allotment reduction would disqualify any activity of a desirable nature set in motion for range improvement and counter the productivity it may have evolved.

In relation to basis of information from which data is drawn and parameters scribed, a questionable validity in base and historical data is cognized. The data base for recognizable study evaluation on which trend data and slope analysis is drawn is not revealed or apparent. The paucity of such data raises speculation regarding the method known as ocular reconnaissance range survey, which incidentally is coupled officially with no other trend data or statistically reliable data method. In short, a need is apparent to establish a data base source from which reasonable trends and estimations can be drawn and less reliability placed on eyeballing. Also, the methodologies utilized are formulated on a basis of scarce data and unreliable plot data information related to select random samples; a technique useful in population estimation but questionable in plant forage data survey with large acreage application.

DM/be



17
JOSEPH C. GREENLEY
Director

ROBERT LEST
Governor

1100 VALLEY ROAD P.O. BOX 10678 RENO, NEVADA 89520 TELEPHONE (703) 784-6214
April 8, 1980

Mike Nolan
Office of the State Planning Coordinator
Capitol Building
Carson City, Nevada 89710

Dear Mike:

The Nevada Department of Wildlife appreciates the opportunity to review and provide comments on Paradise-Denio Scoping, SAI #80200034.

Our comments are as follows:

- The Department supports the proposed scoping process with the following stipulations regarding the proposed seeding:
Plow and Seeding Area Criteria
 - Potential seedings should be limited to those areas which are not expected to respond to the grazing system within a reasonable length of time.
 - Ecological factors such as conducive soils and proper precipitation zones (8-12) inches must be adequate in order to insure seed germination and seedling establishment.
 - Potential seeding areas must not be placed in documented critical wildlife habitats.
 - The cost/benefit ratio of any proposed seeding must be effective and justifiable.

Sincerely,

Joseph C. Greenley
Joseph C. Greenley
Director



17
United States Department of the Interior

IN REPLY REFER TO
1792
(N-022)

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

May 20, 1980

Robert M. Hill
State Planning Coordinator
Capitol Complex
Carson City, Nevada 89710

Dear Mr. Hill:

In the clearinghouse comments dated April 10, 1980 concerning the Paradise-Denio Management Framework Plan Step II and the EIS scoping document the Department of Agriculture stated that they needed additional data. That in particular they would like to see copies of the range survey data and results, and the data on which the trend decisions were based.

Due to the volume of U.S.G.S. orthophoto quads that the survey was done on and the large number of write-up sheets required to do the survey we cannot send you all the information that you request. However, the information is available for you to review here in our office at your convenience.

I am enclosing a copy of the portion of our land use plan which tells how we arrived at our assumptions for condition and trend. We have not made any decisions concerning condition and trend as yet. We have estimated condition and trend for analysis purposes only at this point. Decisions will come through the coordinated resource planning process.

I am also enclosing copies of the instruction memoranda which lays out the suitability criteria which will be used for the Paradise-Denio resource area. This criteria will be assessed on an allotment by allotment basis in the coordinated planning process also.

We welcome your comments and look forward to working with you.

Sincerely yours,

Robert J. Neary
Acting District Manager

Enclosures

cc: Marta Adams, NSO
Nevada Department of Agriculture

COMMITTEE FOR THE EMIGRANT TRAIL NATIONAL MONUMENT

950 OLD TRACE ROAD • PALO ALTO, CALIFORNIA 94306 • TELEPHONE 415/941-0818

April 8, 1980

Mr. William J. Harkenrider, Jr.
Area Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Harkenrider:

Thank you very much for sending the Management Framework Plan Step II for the Paradise-Denio Resource Area. We are very gratified to see that the BLM is recommending a five-mile buffer strip for the Applegate-Lassen Trail. This marvelous cultural resource certainly deserves to be properly protected.

As I'm sure you know, our Committee continues its efforts to have the Applegate-Lassen Trail through Black Rock and High Rock declared a National Historical Monument. We would appreciate being kept abreast of BLM actions concerning the trail in this resource area.

We fully support your efforts to provide for suitable protection for this historic trail.

Sincerely,



Thomas Hunt
California State Coordinator



United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 21, 1980

Thomas Hunt
Committee for the Emigrant
Trail National Monument
950 Old Trace Road
Palo Alto, CA 94306

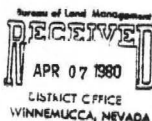
Dear Mr. Hunt:

I would like to thank you for your comments concerning our Management Framework Plan for the Paradise-Denio Resource Area and assure you that your concerns will be considered in any land use decisions that will be made by this district. The district manager's decisions concerning this land use plan are scheduled to be made in December of 1981.

The major portion of the Lassen-Applegate Trail lies within the Sonoma-Carlsbad Resource Area and the land use plan for this area is being formulated at the present time. The area manager's recommendations will be completed sometime in June. We will keep you informed of our progress as we go through this process.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



V.V. Botts
1st. Vice President
Nevada Mining Association
P.O. Box 218
McDermitt, Nevada 89421
April 2, 1980

William J. Harkenrider, Jr.
Paradise-Denio Area Manager
U.S. Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445

Re: Management Framework Plan Step II. Paradise-Denio Resource Area.

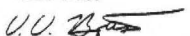
Dear Mr. Harkenrider:

This letter is written to provide input to your management framework plan. In general, the plan appears to be reasonable. However, I would offer the following suggestions:

- (1) The entire recommendation section should be preceded by a statement as to the objectives and priorities of the resource management plan.
- (2) Under minerals Section I - I recognize the purpose of this statement and agree with it. However, since this is the only statement concerning mining in the recommendations, one might infer that land use decisions that would interfere with potential mineral developments could be made in areas other than those mentioned.
- (3) Under minerals 4. a. - one might interpret this section as implying that land use decisions that would interfere with potential oil, gas, or geothermal development might be made in areas outside those classified as prospectively valuable.
- (4) Under minerals 4. c. - the term "Buffer Strip" is not defined in this statement. Since it appears in the minerals section, one would assume that it implies two and a half miles on each side of this trail will be closed to mineral development. At a rate of 3000 acres per mile of trail, this would be a very sizeable closure.

I appreciate this opportunity to comment on the plan.

Yours truly,



V.V. Botts
1st. Vice President
Nevada Mining Association

VVB/kjk

cc: R.E. Warren

United States Department of the Interior

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

IN REPLY REFER TO
1792
(N-022)

April 21, 1980

V.V. Botts
First Vice President
Nevada Mining Association
P.O. Box 218
McDermitt, NV 89421

Dear Mr. Botts:

Thank you for your comments concerning our Management Framework Plan Step II. Your concerns about minerals within the resource area will be considered in any land use decisions that are made.

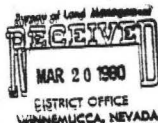
We realize that there are minerals located in more than the four areas listed in the brochure (Jackson, Eugene, Osgood, and Montana Mountains). These mountain ranges contain minerals that have been listed as being of strategic importance. We feel that keeping the lands containing these minerals, free from any decisions that would hinder mineral development is in the best interest of the United States. Mineral development on the rest of the district will be allowed as it has in the past.

The five mile buffer strip along the Applegate-Lassen Historic Trail will be in force only until the area is studied and it is determined whether this area can be leased for geothermal development without damage to the trail. Please call us at any time you have any further questions or comments.

Sincerely yours,

Vaden G. Stickley
Acting District Manager

In the Matter of the Proposed Management Framework Plan for the Paradise-Denio Resource Area noticed for Public Hearing March 19, 1980



STATEMENT

Good evening, my name is Steven Siegel. I am environmental specialist for Sierra Pacific Power Company. Our business address is P O Box 10100, Reno, NV. The company is concerned about the effects of the proposed management framework plan, as it will affect our present and planned facilities and the need for establishing utility planning corridors in the Paradise-Denio Resource Area.

The resource area manager proposes to establish a buffer zone, 10 miles in width, for a section of the Applegate-Lassen historic trail as it crosses the Black Rock Desert. The company is concerned that this buffer zone will restrict development which may impair or alter the visual quality of the trail. The proposal will essentially withdraw 300,800 acres of land.

Will this proposed buffer zone along the Applegate-Lassen historic trail create a barrier for future electric transmission facilities and may it also constrain the siting of electric generation facilities?

If such an exclusion is created it may significantly affect the economic development of the northwestern Nevada region as well as future electric transmission ties with neighboring utilities to the west. At the present time, this region is somewhat limited in its development. This is not to say, however, that this region will not develop in the future. Allowances must be made for such development as desert land entries; residential, commercial and industrial growth in the Gerlach/Empire area; mining; and other commercial enterprises. Additionally, there is a known geothermal

resource area located near Gerlach. This resource may be developed for electric power generation or other commercial use such as vegetable drying. Restriction of electric utilities along this trail may interfere with the development of this geothermal resource. Should Nevada's geothermal resources be further developed, it is conceivable that neighboring utilities in the northwest may also be constructing electric transmission lines through this region. Sierra is presently in the planning phases of identifying an electric transmission tie-line with Pacific Gas & Electric to the west near Alturas, CA.

For these reasons, we highly recommend that BLM establish planning corridors through this region for future utilities. It is further recommended that BLM identify areas along the Applegate-Lassen trail which may be crossed by utilities for future economic development of the region.

The utility and industrial land users of the eleven western states are presently involved in planning corridor studies which will identify future corridors needed in this region.

A planning corridor, as defined is a planning tool used to illustrate the spacial needs of the utility and industrial concerns. It is linear in form, but is non-binding and general in its location. It merely states a need to connect two points.

The Wilderness ad hoc Committee of the Western Utility Group is presently preparing several maps to present to the Bureau of Land Management and the Forest Service in Washington, DC on April 18, 1980. These maps are designed to express the needs of the Western Utility Group for corridors through 1990. By identifying these needs, it is hoped, that the Bureau of Land Management and the Forest Service will address our needs and consider them in their land use plans for the future.

Sierra Pacific would be glad to assist the Bureau of Land Management in developing these planning corridors to meet the needs of all concerned.



United States Department of the Interior

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

IN REPLY REFER TO 1792 (W-022)

April 21, 1980

Steven Siegel Sierra Pacific Power Company P.O. Box 10100 Reno, Nevada

Dear Mr. Siegel:

Thank you for your comments concerning our Management Framework Plan Step II for the Paradise-Denio Resource Area. I would like to assure you that your concerns will be considered in any land use decisions we make. The information which you gave us concerning future proposed powerline routes will be especially helpful.

The district manager's decisions for this land use plan are scheduled to be made in December of 1981. If we can be of any help to you please feel free to call on us at any time. We would also appreciate any new or changing information on your needs as they develop.

Sincerely yours,

Vaden G. Strickley Acting District Manager



United States Department of the Interior

BUREAU OF MINES
EAST 315 MONTGOMERY AVENUE
SPOKANE, WASHINGTON 99207

March 25, 1980

21

Memorandum

To: William J. Harkenrider, Jr., Area Manager, Bureau of Land Management, Winnemucca, Nevada
From: Chief, Western Field Operations Center
Subject: Paradise-Denio Management Framework Plan Step II

The Paradise-Denio Management Framework Plan Step II brochure has been reviewed with respect to its consideration of minerals. We are pleased that minerals have been presented as a major element of consideration in the brochure.

The Bureau of Mines has available minerals data that perhaps would aid you in presenting minerals information. The Bureau's computerized Mineral Industry Location System (MILS) has been used by the Forest Service, Bureau of Land Management offices, other Federal and State agencies, and private concerns as a mineral data base for planning minerals exploration programs.

The enclosed information is provided as guidance in determining costs of reproduction. Many agencies have purchased the computer output and maps. Enclosures with this memorandum show base map numbers and the computer output price list. If you have any questions, please call or write us.

R. N. Appling, Jr.

Enclosures (2)



United States Department of the Interior

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

April 21, 1980

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IN REPLY REFER TO
1792
(N-022)

R.N. Appling, Jr.
U.S. Dept. of Interior
Bureau of Mines
E. 315 Montgomery Ave.
Spokane, Wn 99207

Dear Mr. Appling:

Thank you for your comments concerning our Management Framework Plan Step II for the Paradise-Denio Resource Area. The information you enclosed has been given to our geologist for his information and consideration. I am sure that this data will be helpful in making the land use decisions for the Paradise-Denio Resource Area. These decisions are scheduled to be made in December of 1981.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



(702) 635-5111

P.O. Box 1065
Battle Mountain, NV 89820

March 12, 1980

22

Mr. William J. Harkenrider, Jr.
Area Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, NV 89445

Dear Mr. Harkenrider,

I have reviewed the Management Framework Plan Step II brochure that you sent out last week. The major recommendations concerning minerals is the area on which I would like to direct a few comments.

The Paradise-Denio Resource Area is well endowed with minerals, including, but not limited to, gold, silver, uranium, barite, and tungsten. Each of the listed commodities are of extreme importance in terms of their contribution to helping to maintain this nation as a world power. I am gratified to see, from your recommendations, that the managers of the district have decided that mineral development (and exploration) should be considered a very high use of the public lands. Remember, though, that undue economic constraints on mining caused by start-up delays, unreasonable reclamation requirements and general over-regulation will definitely preclude adequate development of the mineral resources in your area. The decision to mine is always an economic one.

As a general comment on the major recommendations outlined in the brochure, I think you are taking a reasonable approach to the management of your resource area.

Sincerely,

Russ Fields
Chief Geologist,
Battle Mountain



RAP/je



United States Department of the Interior

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

April 21, 1980

22

IN REPLY REFER TO
1792
(N-022)

Russ Fields
Chief Geologist
Milchem
P.O. Box 1065
Battle Mountain, NV 89820

Dear Mr. Fields:

We appreciate your comments concerning our Management Framework Plan Step II for the Paradise-Denio Resource Area.

Our recommendations were made realizing the potential for mineral development with the other resource values in mind. Your concerns will be taken into consideration when the land use decisions are made for the Paradise-Denio Resource Area, which are scheduled for December 1981.

Sincerely yours,

Vaden G. Stickley
Acting District Manager



Chevron Resources Company
A Division of Chevron Industries, Inc.
225 Bush Street, San Francisco, California
New Address: P.O. Box 3722, San Francisco, CA 94119

March 13, 1980

Bureau of Land Management
RECEIVED
MAR 14 1980
DISTRICT OFFICE
WINNEMUCCA, NEVADA

Mr. William J. Harkenrider, Jr.
Paradise-Denio Area Manager
Bureau of Land Management
Winneucca District Office
705 East Fourth Street
Winneucca, NV 89445

Dear Mr. Harkenrider:

Your recommendations for land uses in the Paradise-Denio Resource Area, as outlined in the 1980 BLM brochure, have been reviewed by various members of our Project Evaluations staff. We are in general agreement that the results of the planning process are moderate, constructive, and sensitive to the needs of a broad cross section of citizens.

You are to be congratulated on the balance achieved by your studies.

Yours very truly,

G. Kemp Williams
King's River Project



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
705 East Fourth Street
Winneucca, NV 89445

IN REPLY REFER TO
1792
(N-022)

April 21, 1980

Mr. G. Kemp Williams
King's River Project
Chevron Resources Company
P.O. Box 3722
San Francisco, CA 94119

Dear Mr. Williams:

Thank you for your comments concerning our Management Framework Plan Step II for the Paradise-Denio Resource Area. If before decisions are made, you have any further questions or comments, we would appreciate them.

Sincerely yours,

Vaden G. Stickley
Acting District Manager

Conclusion

The 23 letters received during the scoping comment period and/or comments made at the scoping meetings included specific comments about the scoping document and also requests for more information. Questions concerned ways to participate in the EIS process and specific MFP-II recommendations.

The following are issues that scoping comments showed to be of concern. These are in addition to those previously identified in the preliminary scoping document.

Vegetation

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

Water Resources

Weather Modification

Soils

Soil Development
Productivity

Recreation

Camp Site areas

All of the above issues will be considered in the analysis process and, if found to be significant issues, will be documented and considered in the EIS.

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

These comments have been used and have changed the scope of the EIS. Alternative E was dropped because it was considered unrealistic and Alternative F because it was unworkable. Coordinated resource management planning will be used in the implementation process.

The allocation of vegetation drew numerous comments. Many questioned the validity of the range survey and several asked why the current survey allocated only 120,000 animal unit months (AUMs) while the 1968 survey had allocated more than twice that number. Several comments showed disapproval of

the criteria for period-of-use, key species and suitability. One person wrote that the allocation of vegetation was disproportionate and that at least half of the vegetation should go to wildlife and wild horses.

The Winnemucca District is obligated by law and BLM Directives to allocate only the amount of available vegetation, and to allocate vegetation to wildlife and wild horses. Comments may be made when the Draft EIS is issued and any further objections may be voiced at MFP-III decision time.

Wild horse management drew mixed comments. Several people said that a wild horse area separate from the rest of the area would be a step in the right direction. One person said that a separate wild horse area meant that the BLM was catering to the stockmen. Another person disagreed with removing cattle from the proposed wild horse area.

All these comments are being considered and any further objections may be voiced when the Draft EIS is issued or at the MFP-III decision time.

Range improvement comments varied from the one which asked for more seedings, sprayings and burnings than the Maximizing Livestock Alternative proposed to some which questioned the need for the improvements listed in the Proposed Action.

Disregarding costs, all potentially feasible sites for seeding, spraying and burning have been studied for the Maximum Livestock Alternative. The Proposed Action includes only those sites on which the improvements are economically feasible. Specific comments may be made when the draft EIS is issued.

Economic and social issues were noted by some people. They fear regional and economic losses because of the proposed grazing cuts and also the loss of a unique culture if ranchers are forced to sell their ranches and move away.

Both economic and social issues will be addressed in the EIS.

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

The EIS will try to address the environmental consequences of each alternative. Opportunities to comment on all these concerns will be given after the draft EIS is completed.

Paradise-Denio Grazing
Environmental Impact Statement

FINAL SCOPING DOCUMENT
May 1980

This final scoping document completes an "early and open process" for public input into the scoping process for the Paradise-Denio Grazing Environmental Impact Statement (EIS). The scoping process consisted of determining the scope of the issues to be addressed and identifying the significant issues to be addressed in the EIS.

The Paradise-Denio EIS is being prepared by the Winnemucca District, Bureau of Land Management (BLM) on approximately 3.8 million acres in Nevada's Humboldt and Pershing Counties (see attached map.) The EIS will be an analysis of impacts on the human environment which would be caused by allocating vegetation to big game, wild horses and livestock.

I. PROPOSED ACTION

In the Paradise-Denio Grazing EIS, the BLM proposes to implement a vegetation allocation program to big game (e.g. mule deer, antelope, bighorn sheep, and elk), wild horses, and livestock. Vegetation would be allocated (by use area in each allotment) to reasonable numbers of big game--reasonable as determined by the Nevada Department of Wildlife and concurred with by the BLM. Vegetation allocations to wild horses would be based on optimum numbers--by use area in each allotment--as determined by the Bureau's Management Framework Plan Step II (MFP II). Vegetation allocations to livestock would be based on livestock preference (i.e., Class I demand) by allotment. Vegetation allocations would be based on Animal Unit Months (AUMs) which is the amount of vegetation necessary for the subsistence of one cow or its equivalent (e.g., five deer, five antelope, five bighorn sheep, one elk, or one horse) for one month.

The following items will also be included in the proposed action:

- A. Allocation of vegetation to "reasonable numbers" of big game in use areas, by allotment, as cooperatively determined by the Nevada Department of Wildlife and the Winnemucca District BLM.
- B. Allocation of vegetation to optimum numbers of wild horses and burros by horse use area and by allotment. Optimum numbers are the manageable numbers of horses and burros as determined in the Management Framework Plan Step II (MFP II).

- C. Allocation of vegetation to domestic livestock by allotment or combination of allotments. A determination of numbers and kinds of livestock and period-of-grazing use will be made.
- D. Identification of Allotment Management Plans (AMPs) and non-AMP areas.
- E. Discussion, in a general manner, of grazing treatments needed to provide for the physiological needs of key plant species and, also, a summarization of criteria for considering certain grazing systems.
- F. Identification of studies needed to provide information on condition and trend of the vegetation. These studies will be the basis for making future adjustments in grazing use, and will include, but not be limited to, climate, vegetation utilization, water quality, wildlife habitat, range condition and trend, and actual or licensed use.
- G. Description of specific support facilities, i.e., type (fences, water developments, etc.), general expected locations (maps), and approximate amounts (miles). Range improvement projects to facilitate livestock grazing management may be considered on all allotments if they are economically reasonable.
- H Discussion and tabulation to show: (1) actual use (the last three years of present licensed use, estimated unauthorized livestock use and additional wild horse use); (2) proposed licensed use; and assumptions for future use in 35 years.
- I. A general implementation schedule to include grazing adjustments and priorities. Seven years will be the maximum amount of time for total implementation after the AMPs are prepared, depending on the availability of funds and manpower.
- J. Identification of use supervision procedures.
- K. Identification of standard operating procedures for archeological clearance, endangered species clearance, wilderness clearance, etc.

- L. Identification of wild horse and burro areas.
- M. Identification of wildlife areas.

II. ALTERNATIVES

Four alternatives to the proposed action are presently being considered. Additional alternatives will be considered if they are presented. The 13 items mentioned above will be evaluated for applicability to each of the following alternatives. Future vegetation projections under these alternatives will also be based upon the time period of 35 years.

A. No Livestock Grazing

This alternative is defined as the exclusion of all livestock grazing from public lands in the Paradise-Denio Resource Area. All available vegetation would be allocated to "reasonable numbers" of big game and the numbers of wild horses identified for management in the Management Framework Plan Step I, by horse use area or by herd use area. Vegetation in excess of these requirements would not be allocated, but would be used for nonconsumptive uses such as watershed protection.

B. No Action

This alternative is defined as the range management program in the Paradise-Denio Resource Area as it exists at the time the EIS is being prepared. This includes present livestock and wildlife allocations, and wild horse and burro vegetation requirements. This also includes present levels of studies and supervision as well as the impact of the present program on riparian habitat and areas identified for submission as areas of initial areas critical environmental concern.

C. Maximizing Livestock Use Through Management and Development

This alternative is defined as the maximum development of range improvements throughout the resource area wherever the improvements are technically feasible (Reference Range MFP Step I recommendations). In this alternative, economic reasonableness will be disregarded; however, the cost of the projects will be listed. Under this alternative allocations will be made to "reasonable numbers" of big game and optimum numbers of wild horses and burros, the latter as identified in the MFP-II.

D. Maximizing Wild Horses and Burros in Herd Use Areas on Public Land

This alternative is defined as the allocation of vegetation for the maximum number of wild horses and burros in each herd use area, as defined in the Paradise-Denio Management Framework Plan (Reference Step I Wild Horse and Burro Recommendations).

III. SIGNIFICANT ISSUES

The following items have been identified as significant issues. Both the beneficial and negative impacts will be analyzed and documented in the EIS.

Vegetation

Production
Condition and Trend
Sensitive Plants
Proper Period-of-Use

Wild Horses

Allocation of vegetation
Livestock support facilities
Effects of Allotment Management Plans

Livestock

Trespass
Periods of use
Livestock support facilities
Proper use levels
Grazing treatments
Allocation of vegetation
Allotment Management Plans

Wildlife

Allocation of vegetation
Effects of grazing management treatments
Livestock support facilities
Aquatic habitat & riparian areas

Soils

Erosion

Water Resources

Quality
Yield
Availability

Socio-Economics

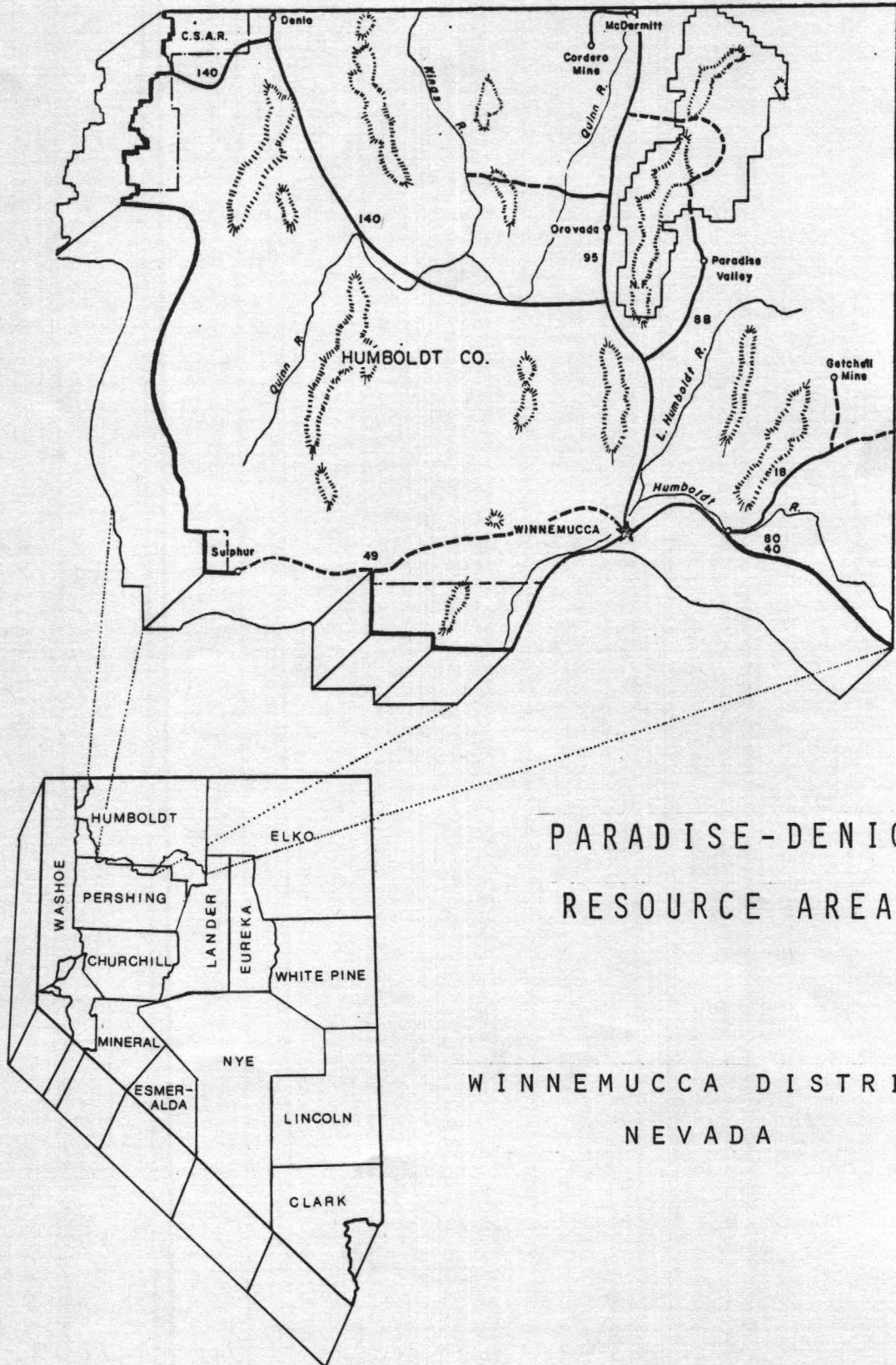
Social values
Economic values
Effects on attitudes and life styles
Grazing permit values

Recreation

Wilderness potential
ORV designations

IV. Nonsignificant Issues

The following items have been identified as non-significant issues, however, they will all be analyzed and if found to be significant, they will be documented in the EIS: Air Quality, Minerals, Grasshopper Control, Ground Squirrel Control, Cultural Resources, Threatened and Endangered Plants, Visual Resources, Forest Products, Fire Management, Small and Medium Sized Mammals, Amphibians, Reptiles, Insects, etc.



PARADISE-DENIO
RESOURCE AREA

WINNEMUCCA DISTRICT
NEVADA