



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
3900 E. IDAHO STREET
P.O. BOX 831
ELKO, NEVADA 89801



IN REPLY REFER TO:

4130 (NV-015)

JAN 12 1996

Commission for the Preservation
of Wild Horses
255 W. Moana Lane Suite 207A
Reno, NV 89509

Dear Ms. Barcomb:

This letter is in response to your correspondence of January 3, 1996, concerning the request by DBA Need More Sheep Co. for temporary non-renewable use in the Badlands/Goshute Mountain Allotments.

In response to your questions, we submit the following: the Badlands Allotment does fall within the Antelope Valley Herd Management Area combined winter use areas by wild horses and livestock as depicted on map 2 and 5 of the Proposed Wells Resource Management Plan Wild Horse Amendment and Environmental Assessment. Less than 5% of the Antelope Valley Herd Management Area (HMA) falls within the Badlands Allotment. The Goshute Mountain Allotment is a small area within the Antelope HMA in the Ely District (please see enclosed map). The two key areas within the Badlands Allotment are key areas where wild horse use would be monitored and horses limited to 10% use prior to livestock turnout. No utilization readings have been collected prior to livestock turnout because aerial census data and allotment inspections have shown only incidental use by wild horses for the last 13 years and ocular estimates by rangeland management specialists have shown utilization by wild horses to be well below the 10% allowable use levels.

To date, monitoring data has consisted of aerial census flights, allotment inspections and frequency, production and utilization transects at the key areas. Ecological Status Inventory has also been completed in the Badlands Allotment.

Approval of the temporary non-renewable use does not set allowable use levels nor appropriate management levels for livestock or wild horses. This will be done through the allotment evaluation and multiple use decision process which is scheduled to be completed in 1996.

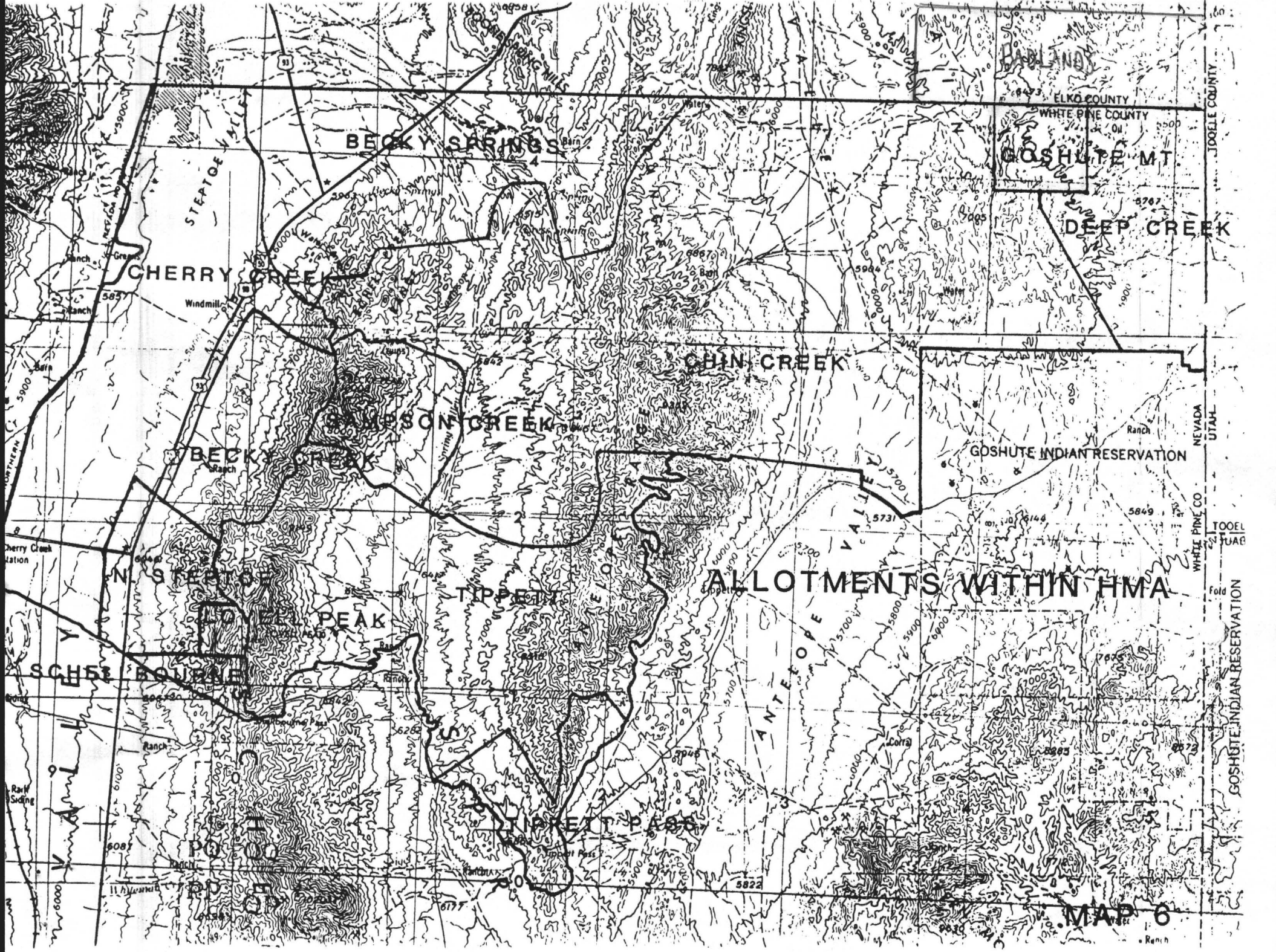
Should you have any questions concerning the subject matter, please contact Kathy McKinstry or Bruce Thompson at (702) 753-0200.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bill Baker", with a stylized flourish at the end.

**BILL BAKER, Manager
Wells Resource Area**

Enclosure: as state above:



MAP 6

Ranch



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

January 19, 1996

Mr. Bill Baker
Wells Resource Area
Bureau of Land Management
3900 East Idaho Street
P.O. Box 831
Elko, Nevada 89801

Subject: Goshute/Badlands TNR

Dear Mr. Baker:

Thank you for your attention to address issues important to the Commission for the Preservation of Wild Horses. It is encouraging to find the Badlands Allotment is scheduled for evaluation this year. The Wells Wild Horse Amendment immediately reduced wild horse herds and established criteria for future adjustments without affecting other uses. Present regulations require consultation for any changes made to grazing permits, but Districts are not providing adequate information or analysis to the affected interests.

In this specific case, the permittee is requesting additional use above the established stocking rate of the Wells Resource Management Plan. Without the benefit of all available range monitoring data, any decision would appear arbitrary. In response to our concern, the District found a key area for wild horses has been established on the allotment and use pattern mapping data does not indicate that the 10% utilization limitation on winter forage for wild horses has not been exceeded. This suggests that winter forage is available for allocation.

Mr. Bill Baker
January 19, 1996
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It is our opinion that there has been sufficient range monitoring data collected since the land use plan. Since new data exists, any action affecting any grazing authorization would require an environmental assessment. The proposed decision should not be assumed as programmatic under the current land use plan.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB
Executive Director

12/15/95



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
3900 E. IDAHO STREET
P.O. BOX 831
ELKO, NEVADA 89801

IN REPLY REFER TO:

4120 (NV-015)

DEC 15 1995

Dear Interested Public:

In accordance with the Grazing Regulations, "... the authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to issuance of nonrenewable grazing permits and leases".

DBA Need More Sheep Company has applied to graze 1,864 sheep on the Badlands/Goshute Mountain Allotment from 3/05/96 to 3/31/96. The permittee's sheep will be on private property in White Pine county on March 4, 1996. The grazing permit for this allotment shows a period of use from 11/01 to 3/03, therefore the application for an extension of use is considered a temporary deviation from the grazing permit. Applications for extension of use have been approved the past few years. Although the application requests an extension, total AUMs of use would not exceed permitted use (active preference).

The Badlands/Goshute Mountain Allotment is a small winter sheep grazing area located east of Antelope Valley approximately 45 miles south of Wendover, Nevada. The application for an extension on or about March 5, 1996 is during the dormant season for the key forage plant which is winterfat/white sage. The health of the plants should not be affected when grazing occurs during the dormant season. This allotment receives only incidental use by wild horses. There are no streams or springs on this allotment. The permittee hauls water into the allotment.

In addition to the standard terms and conditions regarding actual use reports and the use of salt, mineral or protein supplements, the following term and condition will apply:

The extension in period of use (3/5/96 through 3/31/96) is authorized as temporary nonrenewable use, and will not result in a permanent change to your grazing permit.

If you have any comment regarding the approval or denial of this application, please provide it to this office within 15 days of the date of this letter.

If you have any questions, please call Bruce Thompson or Karl Scheetz at (702) 753-0200.

Sincerely yours,



BILL BAKER, Manager
Wells Resource Area

cc: DBA Need More Sheep Co.
Reed B. Robison
US Fish and Wildlife Service
Nevada Dept. of Agriculture
Nevada Division of Wildlife
Commission for the Preservation of Wild Horses
Natural Resources Defense Council
Sierra Club, Toiyabe Chapter
Wells Res. Area Grazing Assn.
Nevada Land Action Assn.
Animal Protection Institute
The Nature Conservancy
HTT Resource Advisors
Gordon Temoak
W. Shoshone Historic Preservation Society
Kathryn Cushman
Federal Land Bank
Edie Wilson
Rutgers School of Law



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

January 3, 1996

Mr. Bill Baker
Wells Resource Area
Bureau of Land Management
3900 East Idaho Street
P.O. Box 831
Elko, Nevada 89801

Subject: Badlands/Goshute Allotment

Dear Mr. Baker:

The Commission for the Preservation of Wild Horses has received the notification to issue temporary non-renewable use for the Badlands/Goshute Mountain Allotment. Insufficient information has been provided to fully assess impacts to wild horses. As with previous comments to these types of notifications, we request the following information:

* What percentage of the wild horse herd management area is affected by this permit?

* Are any of the key areas that limit wild horse use to 10% of winter forage within this allotment?

* Has monitoring data been collected on this allotment since the land use plan?

Please provide any additional information pertinent to wild horse herds and their habitat.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB
Executive Director