



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

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

IN REPLY
REFER TO:

1792
(NV-010)

NOV 28 1983

Dear Reader:

Enclosed for your information is the Proposed Resource Management Plan and Final Environmental Impact Statement (RMP/FEIS) for the Wells Resource Area. This document analyzes the effects of implementing a multiple use resource management plan on 4.1 million acres of public land in the Wells Resource Area, Elko District, Elko, Nevada.

This RMP/FEIS has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations and should be used in conjunction with the draft EIS (INT DEIS 83-30). This final document contains the summary from the draft, the issues and planning criteria, the proposed resource management plan, revisions and errata of the draft, written comments received during the review period, substantive comments presented at the public hearings, and responses to written and oral comments. Modifications from the draft are based on public input and comments received during the comment period.

A protest may be made on this proposed resource management plan within 30 days from release. Any such protest must be in writing to the Director, Bureau of Land Management, 18th and C Streets N.W., Washington, D. C. 20240.

Wilderness recommendations in this plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness will be prepared as required by the Bureau's Wilderness Study Policy.

We extend our thanks to those individuals and organizations who provided suggestions and comments on the draft. Your help has been invaluable in the preparation of the RMP/FEIS which will assist us to more effectively manage the public lands.

PROTEST PERIOD
ENDS FEB. 7, 1984

Sincerely yours,


Edward F. Spang
State Director, Nevada

1 Enclosure

1/22/81

IN REPLY REFER TO

1601 (N-010)



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
P.O. BOX 831
Elko, Nevada 89801

JAN 22 1981

Ms. Dawn Lappin, Director
WHOA!, Inc.
P.O. Box 555
Reno, NV 89504

Dear Ms. Lappin:

The enclosed Elko District newsletter will bring you up to date on our progress toward developing a Resource Management Plan (RMP) for the Wells Resource Area.


Your comments last summer and the suggestions of a number of other individuals and groups were crucial in the identification of significant public land issues which should be dealt with in the Wells RMP. Careful study of all comments resulted in the consolidation of the 15 issues which you see described on pages 2 and 3 of the newsletter. We have also developed guidelines, or "planning criteria", which we propose to follow in resolving each of these issues.

One of the concerns you expressed which is not reflected in these issues is the Desert Land Entry (DLE) program. It has been our policy to begin processing DLE applications as they are received, rather than to delay such action until completion of the RMP in 1983. We are now handling applications by hydrographic basin and expect to have completed the program using this approach by 1983. In the event the program has not been completed by that time, we will have refined our processing methodology to the point where analysis in the RMP would be inappropriate. If you have further questions or concerns about the DLE issue, please let us know.

We would also like to hear your ideas on the issues and planning criteria which have been developed. Are your concerns addressed by these issues? Do you think the planning criteria we are proposing will result in a resolution of the issues? Whether your answer to these questions is yes or no or uncertain at this point, please let us know and tell us why. This is a key step in the planning process. The planning criteria adopted now will largely direct the formulation of management alternatives and, eventually, the selection of the management plan for the Wells Resource Area. We need to know what you think.

Thank you very much for your interest in this program and your contribution to date. We hope that your support and involvement will continue. We will be happy to discuss any aspect of this planning effort with you at any time.

Sincerely yours,


RODNEY HARRIS
District Manager

Enclosure

7/3/80

July 3, 1980

Mr. Lee Wangsguard, Manager
Wells Resource Area
Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Re 1600 (N-010)

Dear Mr. Wangsguard:

Thank you very much for the opportunity to comment upon the Resource Management Plan (RMP). Our apologies for the tardiness of the response and it is hoped that our comments will still be considered, for a fair and equitable plan for all resource values.

Issues and Concerns 1. para. 3

The long-range objectives to achieve identified multiple use; provide forage to help meet the needs of the nation and to help stabilize the livestock industry are well known. Perhaps it is the deficient statement in paragraph 4 that leads one to believe that management is the sole objective as it pertains to wild horses and burros.

The intensive management systems being developed by the Bureau may indeed sustain the livestock industry by creating equal or more forage than presently available; but at what expense? The systems being developed are not necessarily conducive to wildlife or wild horses, an integral part of that ecosystem. The Bureau sees intensive management as the panacea to range problems and we disagree with this extensive portioning off of the public lands to the benefit of a single use. We disagree that fencing, vegetative manipulation, rest-rotation are beneficial to wild horses or wildlife.

Public land disposals/exchanges 2. para. 1

Present laws and regulations exist that provide ample opportunity for community development in an orderly fashion without encouragement from the Bureau. Nevada Statutes are clear regarding public/private lands intermingled. So long as these statutes exist we see no reason why the community cannot live with them.

Desert Land Entry Program 2. para. 3

Our single most question would have to be, "what if the entry usurped the only wild horse habitat within the District?" Followed by would "water draw-down have any

impact on the already short water supplies on public lands which the horses would depend upon?"

Mineral and prospecting 4. para 1

We have no objection for mineral search or energy self-sufficiency; however we are gravely concerned when the agency is mandated to protect the horses, how it can arbitrarily allow mining where animals would be severely impacted. There are few wild horses left in the Elko District and we expect those presently there will be protected from displacement or harassment. If mining is essential then we would expect the Bureau to mitigate those impacts either through expansion of the habitat or water development, etc.

Wilderness 5. para 1

In an area where the birth of the "sagebrush rebellion" was initiated, we look dismally on the ability of the Bureau to designate wilderness as it should be. Wilderness is not for conservationists of today, but rather a bank account of lands set aside for future generations, that they would not be exploited or ruined.

WIDA believes that adequate and just laws exist for the Bureau to take charge and protect not only the resources, but the livestock industry, the wildlife and wild horses and burros, recreation, mining and cultural resources without bias. The RMP is an excellent opportunity for the Bureau to resolve the conflicts between the user groups. Certainly all groups will pay particular attention to this area.

We would appreciate being kept advised as this RMP advances.

Most sincerely,

Bawn Y. Lappin (Mrs.)
Director



United States Department of the Interior

IN REPLY REFER TO
1600 (N-010)

BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
P.O. Box 831
Elko, Nevada 89801

MAY 28 1980

WHOA, Inc.
P.O. Box 555
Reno, NV 89504

Dear Sirs:

The Bureau of Land Management (BLM) is undertaking a major land use planning program in the Wells Resource Area of the Elko District, and is soliciting your assistance to help ensure the project is successful.

The Wells Resource Area (see enclosure 1) has been designated by the BLM as one of five pilot areas in the western states for development and implementation of a Resource Management Plan (RMP) - the land use planning concept outlined in the Federal Land Policy and Management Act of 1976. The major effect of this new planning system will be to combine traditional land use planning and environmental impact assessment processes into one streamlined operation. An increased emphasis on public involvement at all steps is intended to key the attention of land managers to significant issues by identifying public concerns at the outset.

At this first stage of planning, we are especially interested in learning your viewpoints regarding land and resource issues which should be addressed in the RMP. Five general issues already identified by some of our publics (described in enclosure 2) can be used as a starting point. If you have specific ideas relative to these or other issues, we would like to know. We invite you to consider the use, management, and conservation of public land resources in the Wells planning area, as well as local community needs and other concerns.

Our schedule calls for completion of a draft Wells RMP by February 28, 1983, and a final by September 30, 1983. These deadlines ensure compliance with the court mandated schedule for completion of the Wells grazing environmental impact statement (included in the RMP). In order to allow adequate time for accomplishment of the more involved phases of inventory, analysis, and formulation of management alternatives, we are asking that recommendations on issues be submitted by June 30, 1980.



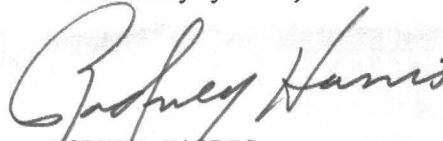
Save Energy and You Serve America!

We encourage your active involvement in this program, and will welcome your ideas at any stage of the planning process. Throughout the development of the Wells RMP, we will strive to maintain an open and continuous dialogue with all of our publics in order to both understand their concerns and to keep them informed of RMP progress.

Please direct your questions or comments on issues to the Wells Area Manager, Lee Wangsgard, by writing the Elko District Office at the above address, or by calling (702) 738-4071. Office hours are 7:30 a.m. to 4:30 p.m., Monday through Friday.

We are looking forward to working with you in establishing sound management policies and practices on our public lands.

Sincerely yours,

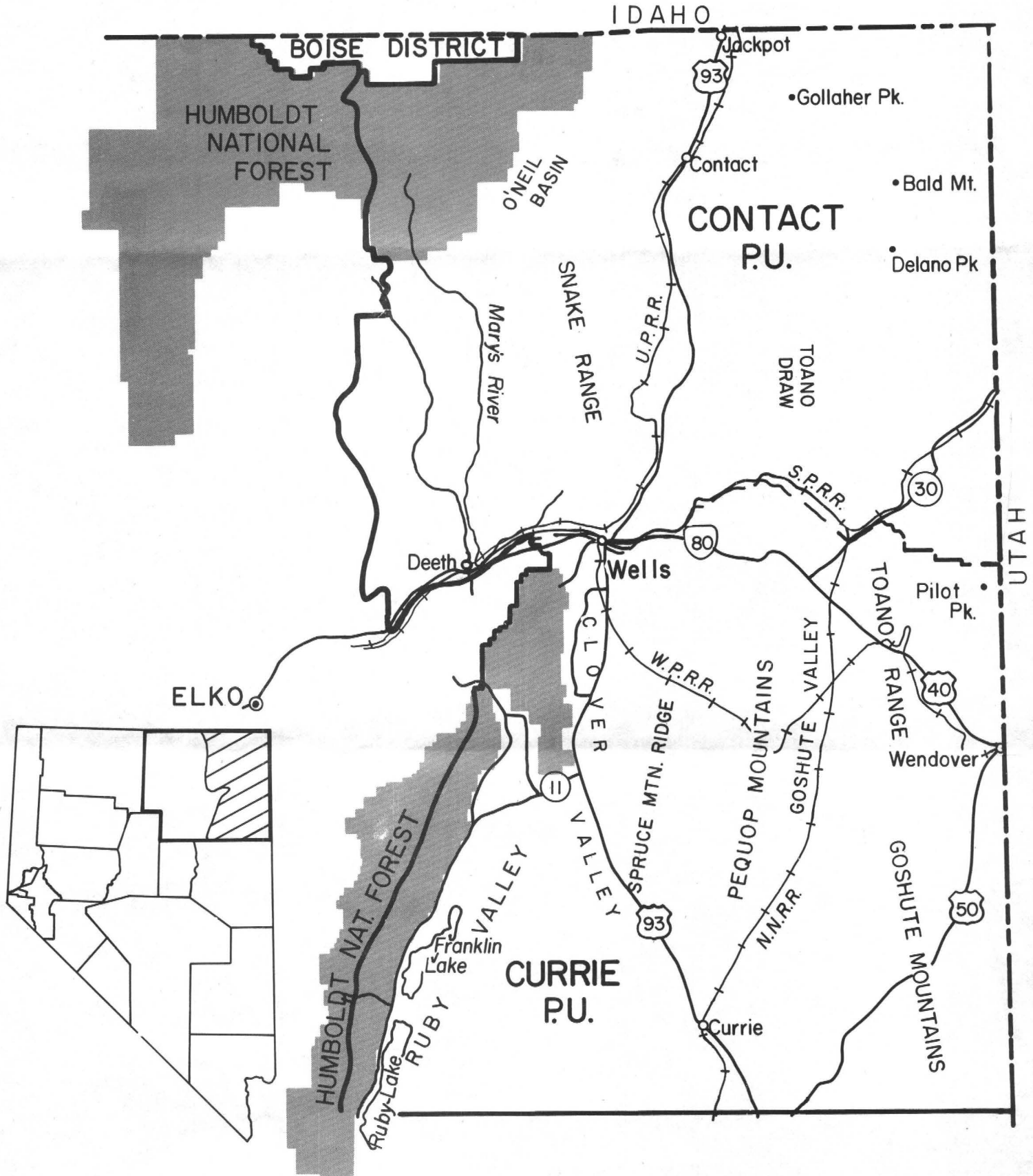
A handwritten signature in cursive script that reads "Rodney Harris".

RODNEY HARRIS
District Manager

Enclosures (2)

- 1-Wells Planning Area Map
- 2-Introduction to Wells RMP

WELLS PLANNING AREA ELKO DISTRICT NEVADA



INTRODUCTION TO WELLS RMP

The Wells Resource Management Plan (RMP) is Nevada's pilot effort at developing and implementing the new land use planning system prescribed by the Federal Land Policy and Management Act of 1976 and recent regulations. The planning area (enclosure 1) corresponds to the Wells Resource Area of the Elko District and consists of two planning units - the Contact Planning Unit in the north and Currie Planning Unit in the south. Prior to this pilot assignment, schedules necessary to complete traditional grazing EISs in the Elko District were triggered by the Natural Resources Defense Council vs. Morton suit of October, 1973. The requirement for meeting mandated court schedules, although now under the RMP concept, remains unchanged. The sequence of steps in the process, from the current phase of issues identification to the ultimate goal of RMP, is outlined below.

- I. Identify issues
- II. Develop draft planning criteria (30 day comment period)
- III. Analyze management situation
- IV. Develop management alternatives (30 day comment period)
- V. Assess effects of alternatives
- VI. Select preferred management alternative
(30 day comment period)
- VII. Issue draft RMP (90 day comment period)
- VIII. File final RMP with Environmental Protection Agency by
September 30, 1983 (30 day protest period)
- IX. Implement RMP and activity plans

Planning Area

The geographic planning area consists of approximately 5,479,000 acres and includes the eastern half of Elko County. Over four million of these acres (80%) are public lands, including a 50-mile wide band of checkerboard ownership which borders the railroad right-of-way, lies in an east-west direction, and approximately bisects the planning area. The area, bordered on the north by Idaho, and the east by Utah, also adjoins the Humboldt National Forest and the Ruby Lake National Wildlife Refuge. Several Indian colonies and reservations fall within and/or are impacted by the planning area.

The Wells Resource Area is also split by Interstate Highway 80 and Highway 93 (see attached map). The area, considered rural, has about three quarters of its population in three "urban" centers - Wells, Jackpot and Wendover. The estimated 1980 population of the Wells Resource Area is 7,000 with a projected 1985 population of 9,000. Employment is principally associated with tourism, outdoor recreation, agriculture and mining; tourism being the major employer. Many goods and services are not provided satisfactorily within the area resulting in residents traveling to Elko, Twin Falls, Idaho, and Salt Lake City, Utah, for a large portion of their needs. Elko, with a 1980 population of 10,452 and an estimated 1985 population of 12,700, is located on Interstate 80 to the west of the Wells Planning Area and constitutes the major community in the Elko District.

Issues and Concerns

A preliminary identification of issues and concerns has been accomplished through public meetings held in March/April, 1979. Key representatives of State and local governments and others associated with major resource activities were requested (November, 1979) to provide general and specific planning recommendations to BLM. The following general topics were identified:

1. Management of vegetation use on public lands

The Elko District has been the center of Nevada's power structure for the livestock industry since passage of the Taylor Grazing Act. The Elko based leadership headquarters of the Nevada Cattlemen's Association provides representation on the Public Lands Council, the political arm of the National Cattlemen's and National Woolgrowers Associations.

Close ties also exist among Nevada Cattlemen's Association leaders in Elko and local leaders of the Nevada Central Board and northeastern Nevada State legislators. Nevada is the "home of the Sagebrush Rebellion" which was initiated by two legislators located in the Elko District, and has resulted in the Wells (and Elko) Planning Area(s) becoming the center of these influential legislators' focus on BLM.

The dependency of the livestock industry on public lands within the Wells Resource Area is substantial. Of approximately 95 livestock operations within the Wells Planning Area, only 10 (11%) have little or no need for BLM administered vegetation to sustain their operations. Past and anticipated changes in rules and regulations governing vegetation allocation are a controversial issue among ranchers and others. A primary concern is focused on the allocation of vegetation among competing uses. Existing range survey data are inadequate for determining proper vegetation allocations.

Other concerns relating to the management of vegetation include grazing trespass, change in class of livestock, livestock distribution, period-of-use by livestock, and management of wild horses. It is expected that with the current emphasis on intensive land management, the checkerboard land pattern occurring in portions of the planning area will make effective resource management more difficult than in areas where large blocks of public lands occur.

The major wildlife problem under current management is lack of livestock grazing systems which also enhance or maintain terrestrial and aquatic wildlife habitat. The task of effectively balancing livestock and wildlife habitat management on public lands through vegetation allocations for reasonable numbers is one of the most challenging problems which must be faced in the Wells Planning Area. ("Reasonable numbers" apply to big game and are determined by the Nevada Department of Wildlife and reviewed by BLM. Figures represent population averages during the past 10 years.)

The demand for big game and upland game bird hunting is high. The ability of the public lands to produce continued opportunities for these activities has caused considerable controversy among livestock operators and wildlife interests.

2. Public land disposals/exchanges

Demands continue to increase for making public lands available for community and agricultural needs. Significant economic and population growth is anticipated in or near principal communities within the next five years. Housing and other community demands are critical at the present time. The number of vacant building lots available within communities has decreased markedly as populations have increased recently, and logical controlled expansion may be directly dependent on the availability of carefully selected public lands.

Community and county leaders are frustrated by difficulties associated with satisfying the regulations of agencies, principally BLM, when trying to develop public purpose land. Their primary concerns involve Federally administered lands adjacent to growth communities and those lands in checkerboard ownership.

3. Desert Land Entry program

The response to the recently re-opened Desert Land Act has resulted in a "land rush" response, which is viewed as a threat to many users of public lands. The Act, which dates back to March 3, 1877, is intended to encourage and promote the reclamation, by irrigation, of arid and semi-arid public lands of the western states through individual effort and private capital. It permits the entry (or use) of up to 320 acres of land per qualified individual for farming purposes. Successful applicants eventually receive title to the land. The Elko District is presently recruiting to establish an inter-district, interdisciplinary "Desert Land Entry Task Force Team", one of two in Nevada. Approximately 40% of the Nevada caseload falls in the Wells Planning Area. The Desert Land Entry program is expected to be of long duration.

4. Mineral prospecting and potential development

Within recent years, oil and gas, geothermal, and locatable mineral (e.g. gold, silver, tungsten and barite) exploration and mining have increased dramatically. It is anticipated that this trend will continue.

5. Wilderness

The roadless/wilderness area concept and program have been highly controversial. The generally negative Nevada reaction to the U.S. Forest Service Rare II effort was strongly reinforced and transferred to BLM's effort. Much of the criticism appeared to stem from an almost universal lack of support and understanding by local governmental groups and the vocal segment of the public regarding inventory procedures and the intent of the Federal Land Policy and Management Act of 1976. Confusion was augmented by editorials and news articles published in rural Nevada newspapers. However, environmental organizations based in Reno, Las Vegas and in other states have voiced general support of BLM's proposed Wilderness Study Areas.

TABLE A-2

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE
(Revised Fiscal Year 85)

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>AUM Demand****</u>
Cherry Creek	DW-1	100	11/15- 3/15	4	3800 (2600)				3800
	DW-6	100	12/01- 3/31	4	1200 (850)				1200
	DS-1	100	3/16-11/14	8	1050 (800)				2100
	DS-6	100	4/01-11/30	8	200 (100)				400
	DS-5	22	4/01-11/30	8	50 (20)				100
	AY-2	32	1/01-12/31	12		90 (120)			200
	TOTAL								
Spruce/Goshutes	DY-1	100	1/01-12/31	12	200 (200)				600
	DS-4	100	3/01-11/30	9	450 (300)				1000
	DY-3	85	1/01-12/31	12	200 (100)				500
	IWI-1	100	10/15-10/31	0.5	3300 (2100)				400
	DW-2	100	11/15- 3/15	4	3800 (2600)				3800
	DW-5	100	12/01- 3/31	4	1200 (850)				1200
	DW-9	51	11/01- 3/30	5	1000 (700)				1300
	DW-10	100	11/01- 3/30	5	3300 (2100)				4150
	DW-11	94	11/01- 3/30	5	1000 (650)				1150
	DW-	100	11/01- 3/30	5	300 (150)				400
	(GOSHUTES)								
	DW-	100	11/01- 3/30	5	850 (450)				1050
	(KINGSLEYS)								300
	DS-5	78	4/01-11/30	8	150 (100)				
	AY-1	29	1/01-12/31	12		20 (20)			50
	AY-2	68	1/01-12/31	12		190 (40)			700
	AY-3	100	1/01-12/31	12		100 (50)			250
	AY-4	100	1/01-12/31	12		100 (25)			250
	AY-5	33	1/01-12/31	12		10 (5)			30
	EY-1	85	1/01-12/31	12				30 (40)	375
			11/01- 3/31	5			60 (55)	250	
BSY-4	100	1/01-12/31	12			200 (0)		500	
BSY-5	86	1/01-12/31	12			120 (0)		300	
TOTAL									18,555

A-6 (Revised)

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>AIM Demand</u>
Mary's River	DY-4	87	1/01-12/31	12	250 (175)				750
	DS-1	56	4/01-10/31	7	2800 (1400)				4900
	DS-4	30	4/01-10/31	7	850 (425)				1500
	AY-1	55	1/01-12/31	12		40 (40)			100
	AS-3	13	4/01-10/31	7		60 (60)			80
	PIEW-1	5	11/01- 3/31	5				10 (0)	40
	BSW-1	15	11/01- 3/31	5			10 (0)		10
TOTAL									7380
O'Neil/Salmon Falls	AS-1	100	4/01-10/31	7		125 (25)			175
	AS-2	100	4/01-10/31	7		150 (30)			200
	AS-3	47	4/01-10/31	7		200 (50)			300
	AW-1	57	11/01- 3/31	5		150 (30)			150
	AW-3	100	11/01- 3/31	5		150 (30)			150
	DY-1	100	1/01-12/31	12	100 (70)				300
	DS-1	44	4/01-10/31	7	2100 (1100)				3700
	DS-2	100	4/01-10/31	7	100 (50)				175
	DS-3	100	4/01-10/31	7	220 (110)				400
	DS-4	41	4/01-10/31	7	1200 (600)				2000
	DS-5	86	4/01-10/31	7	1800 (900)				3100
	DS-9	100	4/01-10/31	7	100 (50)				175
	DS-10	100	4/01-10/31	7	75 (40)				150
	* DSP-1	100	3/01- 3/31	1	4000 (2600)				1000
	DSP-2	100	3/01- 3/31	1	600 (400)				150
	DW-3	100	11/01- 3/31	5	2300 (1500)				2800
	DW-4	100	11/01- 3/31	5	3200 (2000)				4000
	** DW-5	11	11/01- 3/31	5	250 (100)				300
	PIEW-1	95	11/01- 3/31	5				90 (0)	350
	PIES-2	100	4/01-10/31	7				10 (0)	50
BSY-1	100	1/01-12/31	12			90 (0)		200	
BSW-1	85	11/01- 3/31	5			40 (0)		40	
TOTAL									19,765

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>ALM Demand</u>
Goose Creek	** DW-5	31	11/01- 3/31	5	675 (300)				850
	DW-6	100	11/01- 3/31	5	600 (230)				750
	DS-6	100	4/01-10/31	7	820 (300)				1450
	DS-8	88	4/01-10/31	7	450 (175)				800
	DS-5	7	4/01-10/31	7	150 (75)				<u>250</u>
TOTAL									4100
Pilot/Crittenden	DY-2	100	1/01-12/31	12	100 (45)				100
	DY-3	15	1/01-12/31	12	30 (15)				100
	** DW-5	58	11/01- 3/31	5	1300 (550)				1600
	DW-11	6	11/01- 3/31	5	60 (40)				75
	DS-7	100	4/01-10/31	7	200 (75)				350
	DS-8	12	4/01-10/31	7	60 (25)				100
	EY-1	15	1/01-12/31	12				30 (20)	50
				11/01- 3/31	5			170 (50)	700
	BSY-5	14	1/01-12/31	12			20 (0)		<u>50</u>
TOTAL									3125
Metropolis	DY-4	13	1/01-12/31	12	40 (25)				120
	DS-4	29	4/01-10/31	7	820 (410)				1450
	DS-5	7	4/01-10/31	7	150 (75)				250
	DW-9	4	11/01- 3/31	5	80 (60)				100
	AY-1	45	1/01-12/31	12			35 (10)		80
	AS-3	40	4/01-10/31	7			180 (70)		250
	AS-4	100	4/01-10/31	7			50 (20)		70
	AW-1	43	11/01- 3/31	7			100 (40)		150
	AW-2	100	11/01- 3/31	7			50 (20)		<u>70</u>
TOTAL									2540

A-8 (Revised)

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>AUM Demand</u>
Ruby/Wood Hills	DW-4	100	12/01- 4/30	5	725 (475)				900
	DSP-1	100	4/15- 5/15	1	3000 (2100)				750
	DW-9	45	11/01- 3/30	5	1000 (650)				1200
	DSP-2	100	4/15- 5/15	1	600 (475)				150
	AY-1	71	1/01-12/31	12		40 (80)			100
	AY-5	67	1/01-12/31	12		25 (5)			<u>50</u>
TOTAL									<u>3150</u>
Wells RA Total									<u><u>66,415</u></u>

* - Deer Spring (DSP) is figured at the same percentage as the existing carrying capacity of the primary winter range (% existing of reasonable)

** - Reasonable & existing numbers do not allow for approximately 4000 deer that migrate into this area from Idaho & Utah.

*** - Reasonable Numbers updated by publication Potential Bighorn Sheep Habitat in Northern Nevada, Golden & Tsukumoto 1979.

**** - AUM demand, as depicted here, only represents what the demand of reasonable numbers would be. Allocation is not implied nor anticipated, this information is presented for analysis purposes only.

PROPOSED RESOURCE MANAGEMENT PLAN
AND FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

WELLS RESOURCE AREA

NEVADA

Prepared by the

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT


Edward F. Spang
Nevada State Director

This proposed resource management plan is a long-term (20 year) plan to manage 4.1 million acres of public land within the Wells Resource Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that require the Bureau of Land Management to develop land use plans for the public land and to study the suitability of certain lands for wilderness designation. It was developed following a 90-day public review of the draft environmental impact statement, which described and analyzed five alternatives to guide the overall management of the resource area. An integral environmental impact statement assesses the environmental consequences of the plan.

This document is both the proposed resource management plan and the final environmental impact statement. Wilderness recommendations in the plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness will be prepared as required by the Bureau's Wilderness Study Policy. The Wells Wilderness Technical Report, containing the wilderness study area specific analyses required by the study policy, is available upon request.

For further information contact: Rodney Harris, District Manager, P.O. Box 831, Elko, Nevada 89801 (702-738-4071).

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

JAN 6 1984

INT FEIS 84 - 1

INT FEIS 84 - 1

PREFACE

The Final Wells Resource Management Plan and Environmental Impact Statement (FRMP/EIS) has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations. This Final RMP/EIS must be used with the Draft RMP/EIS (INT DEIS 83-30). The Final RMP/EIS contains the summary from the draft document, the proposed resource management plan, revisions and errata of the Draft, written comments received during the public review process, substantive comments presented at the public hearings and the responses to those comments.

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SUMMARY

In accordance with the Federal Land Policy and Management Act (FLPMA) of 1976, the Bureau of Land Management (BLM) is proposing to implement a Resource Management Plan (RMP) in the Wells Resource Area (RA), Elko District, Nevada. The Wells RA encompasses about 5.1 million acres, of which 4.1 million acres are public land. The resource area encompasses the eastern half of Elko County in northeastern Nevada. Because of its large size and for analysis purposes, the resource area was divided into eight smaller areas called Resource Conflict Areas (RCAs). Each RCA has its own unique combination of problems and conflicts. The RCAs and their major conflicts are described on page 2-1 of the Draft Environmental Impact Statement (DEIS).

Early in the planning process, several issues of concern were identified. Those issues included the following items:

1. Land Actions
2. Corridor Designation and/or Identification
3. Public Access
4. Recreation Management
5. Wilderness Area Designation
6. Livestock Grazing Use
7. Wild Horse Numbers
8. Terrestrial Wildlife Habitat
9. Riparian/Stream Habitat
10. Woodland Products

These issues form the basis for management actions within the proposed resource management plan.

AFFECTED ENVIRONMENT

Lands

Federal ownership amounts to about 80 percent of the land within the Wells RA boundaries. The land in private ownership is concentrated primarily within the 40 mile wide "checkerboard" area which bisects the Wells RA. This land was originally granted to the Union Pacific and Central Pacific Railroads as an incentive for construction of the transcontinental railroad. The checkerboard land pattern presents management problems in the resource area for both Federal and private managers. Rapid community growth by the principal towns of Wells, West Wendover, and Jackpot has created considerable pressure for disposal of Federal lands to private ownership. A recent resurgent interest in agricultural development is the other major factor contributing to the demand for public lands.

Corridors

No utility corridors have been designated or identified in the resource area at this time, although there are existing proposals for major utility developments.

Access

Increased public demand for access for recreation, livestock management, and woodland products harvesting purposes will intensify the needs for access planning.

Recreation

Recreation activities throughout the resource area consist primarily of camping, hunting, fishing, and sightseeing. Presently only two recreation sites are administered by BLM, one at Ruby Marsh (a developed campground) and one at Tabor Creek (undeveloped).

Some environmental degradation problems are occurring at these and other areas having recreational values because of unregulated off-road vehicle (ORV) use, lack of facilities, and poor refuse disposal methods.

Wilderness

Four wilderness study areas (WSAs) have been identified in the resource area as having potential for wilderness designation. Each WSA has been evaluated for wilderness values including special and unique features, and also for conflicts with other resources such as energy and minerals, livestock use, and rights-of-way.

These WSAs total 175,951 acres and include the Bluebell WSA (55,665 acres) in the northern half of the Goshute Mountains, the Goshute Peak WSA (69,770 acres) in the southern half of the Goshute Mountains, the South Pequop WSA (41,090 acres) at the southern end of the Pequop Mountains, and the Bad Lands WSA (9,426 acres) which includes a portion of Salmon Falls Creek and lies to the southwest of the community of Jackpot.

Livestock Grazing

Livestock grazing in the Wells RA consists of both sheep and cattle operations with a total of 81 livestock operators using 89 allotments. The grazing preference amounts to 379,279 Animal Unit Months (AUMs) with a current licensed grazing use of 288,934 AUMs.

Wild Horses

Wild horses are currently found in six herd units within the Wells RA. The most recent census for the resource area shows that the total population was about 700 animals in 1981.

Terrestrial Wildlife Habitat

The bald eagle is the only resident Federally listed endangered species found in the Wells RA. Peregrine falcons, also on the endangered list, are occasionally observed. Bighorn sheep, a Nevada listed sensitive species, are no longer found in the area.

Mule deer and pronghorn antelope occur throughout the resource area with mule deer populations currently estimated at 38,000-40,000 animals and antelope numbers at 800-1000 animals. Elk occur

only in the Pilot Peak area with current population estimates at 50-100 animals.

Mule deer habitat conditions range from fair to good on summer range and fair to poor on winter range. Antelope ranges are generally in fair to poor condition.

A variety of upland game, including chukar part ridge, sage grouse, blue grouse, mourning doves, and rabbits inhabit the resource area.

Numerous hazards to wildlife exist in the Wells RA. Improperly constructed fences present barriers to large game species and improperly constructed water facilities often prevent animals from using them and serve as drowning hazards.

Terrestrial riparian habitats include seeps, springs, small wet meadows, small natural ponds, and small groups of trees.

Riparian/Stream Habitat

Riparian/stream habitats comprise less than one percent of the total land area, yet, these lands support the majority of use by livestock, wildlife, and humans with livestock being the dominant use. A joint Nevada Department of Wildlife/BLM stream survey (1979-80), indicated about 73 percent of the 220 miles (5,928 acres) of riparian habitat administered by BLM is rated in fair or poor condition.

Threatened, Endangered, or Sensitive Fish Species

Threatened and Endangered (T&E) or sensitive species of fish found within the resource area include the Lahontan cutthroat trout, redband trout, relict (Steptoe) dace, Independence Valley tui chub, Clover Valley speckled dace, and Independence Valley speckled dace. The Lahontan cutthroat is the most wide-spread of these species.

Woodland Products

Woodland areas occupy 600,000 to 700,000 acres within the resource area. Fuelwood, Christmas trees, pinenut harvesting, and post cutting contribute to the area's economy. Some commercial businesses depend on these products for a livelihood and many of the local residents depend on wood for at least part of their home heating needs. As energy prices rise, the demand for fuelwood may intensify. Overharvesting and

unauthorized harvesting of woodland products would continue to be a problem in localized areas.

Minerals

Minerals mining and exploration is a significant activity within the Wells RA. Barite is the most important mineral mined; however, tungsten, silver, copper, and molybdenum are other important minerals, mined at the 13 active mines in the resource area. Minerals exploration for locatable minerals, especially gold, is very active with hundreds of new mining claims being filed annually. Oil and gas exploration is also active with about 100 new leases issued each year. Oil and gas exploration has been largely unsuccessful at the present time. Some geothermal exploration has occurred near Ruby Valley. The potential for geothermal development is considered high, as evidenced by numerous hot springs found throughout the area.

Human Resources

The 1980 population for the resource area was about 3395 persons. Most of these were concentrated in Wells, West Wendover, and Jackpot. Tourism is the most important income producing trade in the Wells RA, followed by agriculture and then mining. Businesses such as retail trades, banking, and manufacturing are not well developed because of the small resource area population. Mining and energy-related projects such as the Thousand Springs and White Pine Power Projects could result in large influxes of employees to construct, maintain, and operate these facilities.

Vegetation

The Wells RA supports vegetation typical of the Great Basin region. A total of 18 different vegetation types are present as a result of extremes in climate, elevation, exposure, and soils. The sagebrush-rabbitbrush community is the dominant vegetation type, covering almost two-thirds of the resource area. This is followed by the pinyon pine-juniper type which comprises one-fifth of the area. Other vegetation types include greasewood, saltbush, grasslands and riparian vegetation. Range condition surveys have not been completed with respect to percentages of the entire resource area within each of the ecologic range condition classes. However, preliminary information shows that 20 percent is in poor condition, 54 percent is in fair, and 26 percent is in good or excellent condition.

Poisonous plants are common within the resource area. Halogeton and greasewood are probably the most prevalent and the source of greatest concern especially to sheep operations. Other common species include poison vetch, death camas, lupine, horsebrush, and larkspur.

No Federally listed T&E plants are known to exist in the resource area. However, several which are candidate species for inclusion in this list or are species of special concern are either known to occur or have the potential of being found in the resource area.

Soils

The relatively short growing season and low levels of precipitation are two climatic factors which limit soil productivity within the Wells RA. High temperatures and low rainfall promote rapid drying of soils so that by mid-summer most plant growth ceases. Soils are rather poorly developed because of these climatic limitations on plant growth. The most productive areas are irrigated pastures or croplands followed by floodplain areas of perennial streams and then the deeper mountain soils at elevations above 6300 feet. Wind and water erosion pose problems for soil management in the resource area; severe down cutting of stream channels with subsequent lowering of both water tables and productivity in riparian areas appears to be the most serious erosion-related problem.

Water Resources

Surface water in the resource area is rather limited. Most overland flow is intermittent, with only a few major streams either emptying into the Humboldt or Snake-Columbia River systems. Availability of surface water is quite often the limiting factor which affects livestock distribution and wildlife and wild horse populations and distribution. Ground water supplies are more abundant. Generally, adequate amounts of water can be obtained for domestic use or for livestock and wildlife by drilling wells to a maximum of 500 feet.

Air Quality

Air quality is rated good for most of the Wells RA. Wind-blown dust is the major contributor to air pollution. Industrial sulphur dioxide pollution from the Ely, Nevada area has been found to exceed acceptable limits in the Steptoe Valley area.

Visual Resources

Spectacular vistas of north-south trending mountain ranges separated by large, flat valleys are present throughout the resource area.

Cultural Resources

An intensive inventory of archaeological resources in the Wells RA has not been done. Approximately 1100 sites have been recorded to date. The most common sites are small temporary camps, however, several large semipermanent winter camps, rockshelters, antelope traps, rock art sites, and lithic procurement areas are also present.

PROPOSED RESOURCE MANAGEMENT PLAN

The Proposed Resource Management Plan is a multiple use plan designed to protect fragile and unique resources while not overly restricting the ability of other resources to provide economic goods and services. A total of 90,000 acres of land would be offered to the public, primarily through public sale. A total of 566 miles of transportation and utility corridors would be identified or designated based on proposals in this plan. Easement acquisitions would be acquired on 158 miles of roads for high priority management activities such as recreation, livestock grazing, woodland products, and minerals. Recreation facilities at Ruby Marsh, Salmon Falls Creek, Tabor Creek and Mary's River would be upgraded or developed. A 160 acre tract at Ruby Marsh Campground would have ORV use limited to designated roads and trails and would be segregated from mineral entry. A total of 159,881 acres would be recommended as preliminarily suitable for wilderness designation. Livestock grazing levels would be increased by 1.7 percent to 293,846 AUMs from the present 3 to 5 year average use level of 288,934 AUMs. This represents a 22.5 percent reduction from preference. A total of 37,500 acres would be seeded, 27,000 acres would be burned on a prescription basis, 1,500 acres sprayed, 65 wells drilled, 5 reservoirs constructed, 265 miles of fence built, 30 springs developed, and 80 miles of pipeline built. The wild horse population would be allowed to fluctuate between 557 to 692 animals. Approximately 95 miles of deteriorated riparian/stream habitat would be improved over the long-term. Terrestrial wildlife actions would include modification of 650 miles of fence, 250 spring developments, designation of 6,200 acres as an Area of Critical

Environmental Concern (ACEC) for peregrine falcons, treatment and seeding of 5,500 acres of crucial deer winter range and time of year restrictions on use of crucial sage grouse and mule deer habitats. Habitat in potential bighorn sheep reintroduction sites would be improved and approximately 53,600 acres of woodland would be more intensively managed to meet wildlife needs. Woodland products harvesting would be designed to achieve a sustained yield of both Christmas trees and firewood and would emphasize both commercial and private uses.

The following list displays the implementation costs of the Proposed Resource Management Plan by resource.

<u>ITEM</u>	<u>COST</u>
Recreation Development	\$30,000
Livestock Grazing Improvements	\$2,429,500
Wild Horse Improvements	\$90,000
Wildlife Habitat	\$1,509,000
Riparian Habitat Improvement	<u>\$585,000</u>
TOTAL	\$4,643,500

NOTE: These costs are for labor and materials only. They do not include BIM overhead costs for environmental assessment and contract preparation and contract supervision.

ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED RESOURCE MANAGEMENT PLAN

Lands

Resource area land values may be expected to decrease as a result of implementing a large-scale (90,000 acres) land disposal program.

Corridors

Corridor designations and identifications would provide for adequate long range planning by the affected interests. Corridor designations would detrimentally affect bald eagles and visual resources.

Access

Access would be acquired over 158 miles on 38 roads identified as being important for public access and BLM administration. No important access routes are expected to be lost.

Recreation

The quality of dispersed recreational hunting, fishing, and wildlife observation would improve and recreation use would increase. Opportunities at developed facilities would be enhanced because of proposed improvements. No significant adverse impact to ORV use would occur.

Wilderness

A total of 159,881 acres in portions of the Bluebell, Goshute Peak, South Pequop, and Bad Lands WSAs would be recommended as preliminary suitable for designation as wilderness and would retain their wilderness character. About 16,070 acres would lose their wilderness character over time.

Livestock Grazing

Livestock grazing would be increased by 1.7 percent over the existing 3 to 5 year average use level to 293,846 AUMs. Range condition would improve as a result of new range improvements — notably water developments, seedings and fences — and improved grazing management. Large scale land disposals could displace affected ranchers if lands pass into private ownership to someone other than the permittee.

Wild Horses

Wild horse numbers would fluctuate between 550 and 700 horses. New water developments would benefit wild horses, whereas proposed fences would impede their free roaming nature.

Terrestrial Wildlife Habitat

Opportunities to reintroduce peregrine falcons would be enhanced because of ACEC designation. Reintroduction of bighorn sheep would be enhanced greatly if wilderness designation of the Bad Lands, Goshute Peak, and/or Bluebell WSAs were to be enacted. About 60 percent of existing big game habitat and 75 percent of terrestrial

riparian habitat would improve one condition class. About 10 percent of fair or good riparian habitat would decline one condition class. An active program for reduction of hazards to wildlife would be initiated throughout the resource area.

Riparian/Stream Habitat

Indications are that 104 miles or 23 percent of existing riparian/stream habitat would be managed in good or better condition whereas the remaining habitat would be in less than good condition.

Woodland Products

Fuelwood harvest would increase by more than 10 percent under an intensive management program. This plan would benefit both private and commercial parties.

Minerals

A total of 21,750 acres having good mineral potential would be recommended as being preliminarily suitable for wilderness designation.

Time of year restrictions to protect sage grouse strutting and nesting habitats would slow oil/gas and geothermal exploration and/or development.

CHAPTER 1

INTRODUCTION

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INTRODUCTION

PURPOSE AND NEED

Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) states "The Secretary shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands." The guidance for preparing this RMP is contained in 43 CFR Part 1600, Public Lands and Resources; Planning, Programming, and Budgeting.

Section 603 of the same act requires the Secretary to review roadless areas of 5000 acres or more in size for wilderness characteristics and report to the President his recommendations as to the suitability or unsuitability of each such area as wilderness. Four wilderness study areas are examined in this plan.

The National Environmental Policy Act of 1969 (NEPA) requires Federal agencies to prepare statements documenting the environmental consequences of Federal actions significantly affecting the human environment. Resource management plans qualify as significant actions and thus require the preparation of an environmental impact statement (EIS). The Council on Environmental Quality's Regulations for Implementation of the Procedural Provisions of NEPA (40 CFR Part 1500) provide guidance for the preparation of environmental impact statements. This document combines the Proposed Resource Management Plan and FEIS into an integrated package.

The overall purpose of the resource management planning process is to improve the resources of the resource area which would result in increased goods and services to the public land users and general public. This will be accomplished through a planning process using an interdisciplinary approach that includes participation by the public, other Federal agencies, state and local governments, and Indian tribes. RMPs are

designed to make maximum use of the best available data in formulating and analyzing alternatives.

The Proposed Wells Resource Management Plan is designed to provide a framework for future management of the public lands and resources in the Wells RA. This framework will be established by determining which resources will be given management emphasis. This will be consistent with existing legislation, regulations, and the policy of management of public lands on the basis of multiple use and sustained yield. This will be done "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmosphere, water resource, and archaeological values" (FLPMA, Sec. 102 (a)(7) and (8)).

In addition to meeting the planning needs for the Wells RA, the RMP also fulfills other specific objectives. A suit was filed in 1973 in Federal Court alleging that the Bureau of Land Management's programmatic grazing EIS did not comply with the National Environmental Policy Act. As a result of the settlement of this suit, BIM agreed to prepare specific grazing EISs. The RMP will meet this and other important public objectives as well as identify lands which will be made available for sale or exchange to consolidate ownership for improved management.

ISSUES AND PLANNING CRITERIA

RMPs are limited to issues which are of major concern and importance to the BIM and the public it serves. The previous planning system provided detail on a wide range of issues and concerns without considering their overall significance.

The following issues and planning criteria focus on specific resource conflicts in the Wells RA. They are divided into land management or vegetation management issues.

LAND MANAGEMENT ISSUES

ISSUE 1: PROBLEMS OCCUR IN THE MANAGEMENT OF THE "CHECKERBOARD" AREA, AND DEMANDS ARE PLACED ON PUBLIC LANDS FOR COMMUNITY EXPANSION NEEDS AND AGRICULTURAL DEVELOPMENT.

Problems including access, accommodation of public works projects, and unauthorized uses of public lands occur in certain areas as a result of the intermingled pattern of public and private land ownership. Public lands are in demand for agricultural development, urban and residential expansion, and other intensive uses. Public lands can be disposed of for these or other purposes if disposal serves the national interest. A variety of land tenure adjustment procedures are available which could help meet these needs and resolve land management problems.

Planning Criteria

1. Public lands will be placed in one of the following categories:

Category I — lands and mineral resources which will be retained in Federal ownership and will not be considered for sale.

Category II — lands which will be considered for sale or transfer. The mineral estate of Category II land may be sold upon application as allowed in section 209 of FLPMA. The mineral estate can be conveyed upon application if 1) there are no known mineral values or 2) that reservation of the mineral rights in the United States is interfering or precluding nonmineral development of the land and that such development is a more beneficial use of the land than mineral development.

Category III — lands and mineral resources which will require further study in order to determine whether they should be placed in Category I or II.

2. Propose sale of a parcel of land if:

- a. It is difficult or uneconomical to manage and is not suitable for management by another Federal agency.
- b. It was acquired for a specific purpose which is no longer served by retention.

- c. Disposal would serve important public objectives and would outweigh the public objectives and values which would be served by retention.

3. Consider allowing agricultural entry where:

- a. There is unappropriated ground water available and the development of new irrigation wells meets the criteria established by the state water engineer.
- b. The land is suitable for agricultural use as established through appropriate laws and regulations.

4. Consider for withdrawal land which another Federal agency has shown to be necessary to its programs.

5. Where a critical resource need for a tract of land is identified, consider purchase only if other forms of acquisition (such as exchange and easements) are not feasible.

ISSUE 2: ROUTES MUST BE DETERMINED FOR MAJOR TRANSMISSION LINES, PIPELINES, RAILROADS, AND OTHER UTILITY/TRANSPORTATION USES.

As demands for energy (e.g., oil and gas, new powerplants) arise, construction of interstate high voltage powerlines, pipelines, and other facilities becomes necessary. This requires designation and/or identification of corridors for existing and future major transportation and utility rights-of-way (ROWS) within the planning area.

Planning Criteria

1. Establish designated corridors for major facilities in areas that meet all of the following criteria:

- a. Have existing major facilities,
- b. Are technically and economically suited for such uses,
- c. Correspond with designated corridors in other planning areas, and
- d. Do not have significant values that would be adversely impacted. Areas having significant values could include

wilderness study areas, ACECs, and/or T and E species habitat.

2. Give priority to corridor determination in the following order:

- a. Use existing transmission ROWs with sufficient width to upgrade existing facilities and that will permit further expansion.
- b. Follow existing secondary highways and railroads.
- c. Identify corridors through undeveloped areas or along interstate highways.

ISSUE 3: LEGAL ACCESS IS NECESSARY TO ENABLE CONTINUED PUBLIC USE AND TO FACILITATE EFFECTIVE MANAGEMENT OF PUBLIC LANDS.

Legal access is defined as the lawful right to enter or leave a parcel of land. It includes the right to enter adjacent public land from an existing public road or trail, as well as from roads or trails that lead to public land through private property. Neither BLM nor the public has an inherent right of legal access to public lands over private property. As populations, recreational use, and mining activities increase, access problems could occur.

Planning Criteria

1. Select roads and trails for inclusion in the transportation system according to:
 - a. Type and frequency of historical use,
 - b. Identified public needs,
 - c. Management requirements, and
 - d. Coordination with other Federal agencies, and state, county, and local governments, Indian tribes, and affected private landowners.
2. Establish priorities for access acquisition on the basis of identified public and administrative needs.
3. Consider consolidating roads or trails that serve common purposes, origins, and/or destinations.

ISSUE 4: CERTAIN LANDS REQUIRE SPECIAL MANAGEMENT FOR THEIR RECREATION POTENTIAL.

Special recreation management can include designation, protection, and/or development of certain areas for a variety of significant recreational values. Recreation management should be designed to provide for current uses as well as to accommodate projected demands.

The National Park Service (NPS) has conducted inventories to identify the best remaining relatively natural and free-flowing stream segments in the United States. Some of these stream segments may meet minimum criteria for further study as potential components of the National Wild and Scenic Rivers System. The Mary's River from the western boundary of Section 13, T. 42 N., R. 59 E., to its source was so identified.

Planning Criteria

1. In evaluating the suitability of recreational lands for special designations, protection, and/or development:
 - a. Identify for development those areas which receive significant recreation use.
 - b. Consider recreational demands outlined in the Statewide Comprehensive Outdoor Recreation Plan (SCORP), and county or local planning documents.
 - c. Give priority to areas which provide opportunities for more than one recreation activity.
 - d. Consider non-Federal areas or facilities when planning future recreation development.
2. Maintain all lands open to off-road-vehicle (ORV) use. Consider a limited or closed designation if:
 - a. Significant cultural or natural features may be damaged.
 - b. Harassment of wildlife or damage to wildlife habitat may occur.
 - c. Threatened or endangered species may be adversely impacted.

- d. Wilderness suitability of WSAs may be impaired.
- e. Extreme natural or manmade hazards to human life or property exist.

3. Consider whether a portion of the Mary's River from the western boundary of Section 13, T 42 N., R. 59 E., to its source should be recommended for further study as a potential component of the National Wild and Scenic Rivers System. The standards for inclusion are:

- a. General
 - 1. Substantially free-flowing
 - 2. Water of high quality or water that could be restored to that condition
 - 3. River and adjacent lands in a natural or aesthetically pleasing condition and possessing outstanding scenic, recreation, geologic, fish and wildlife, historic, cultural, or similar values
- b. Wild Rivers
 - 1. Free of impoundments
 - 2. Inaccessible by trail
 - 3. Primitive watershed
 - 4. Unpolluted water
- c. Scenic Rivers
 - 1. Free of impoundments
 - 2. Accessible in places by roads
 - 3. Watersheds largely primitive
 - 4. Shorelines largely undeveloped
- d. Recreational Rivers
 - 1. Some impoundments and diversion
 - 2. Readily accessible by road or railroad
 - 3. Some development along shore

ISSUE 5: TO DETERMINE WHETHER THE BLUEBELL, GOSHUTE PEAK, SOUTH PEQUOP, AND BAD LANDS WSAs SHOULD BE RECOMMENDED AS WILDERNESS AREAS.

BLM's wilderness review is a process which includes public involvement at local, state, and national levels. Wilderness area designation is resolved by Presidential recommendation and Congressional action.

Planning Criteria

BLM recommendations for wilderness suitability will be based on the following criteria:

1. Evaluation of wilderness values
 - a. Mandatory wilderness characteristics: The quality of the area's wilderness characteristics - size, naturalness, and outstanding opportunities for solitude or primitive recreation.
 - b. Special features: The presence or absence, and the quality of the optional wilderness characteristics - ecological, geological, or other features of scientific, educational, scenic, or historical value.
 - c. Multiple resource benefits: The benefits to other multiple resource values and uses which only wilderness designation of the area could ensure.
 - d. Diversity in the National Wilderness Preservation System: Consider the extent to which wilderness designation of the area under study would contribute to the diversity of the National Wilderness Preservation System from the standpoint of each of the factors listed below:
 1. Expanding the diversity of natural systems and features, as represented by ecosystems and landforms.
 2. Assessing the opportunities for solitude or primitive recreation within a day's driving time (5 hours) of major population centers.
 3. Balancing the geographic distribution of wilderness areas.
2. Manageability

The area must be capable of being effectively managed to preserve its wilderness character.
3. Quality Standards
 - a. Energy and Mineral Resource Values: Recommendations as to an area's suitability or unsuitability for wilderness designation will reflect a

through consideration of any identified or potential energy and mineral resource values present in the area.

- b. **Impacts on Other Resources:** Consider the extent to which other resource values or uses of the area would be foregone or adversely affected as a result of wilderness designation.
- c. **Impacts of Nondesignation on Wilderness Values:** Consider the alternative use of the land under study if the WSA or some portion of the WSA is not designated as wilderness and the extent to which the wilderness values of the area would be foregone or adversely affected as a result of this use.
- d. **Public Comment:** In determining whether an area is suitable for wilderness designation, the BLM wilderness study process will consider comments received from interested and affected publics at all levels - local, state, regional, and national. Wilderness recommendations will not be based exclusively on a vote-counting majority rule system. The BLM will develop its recommendations by considering public comment in conjunction with its analysis of a WSA's multiple resource and social and economic values and uses.
- e. **Local Social and Economic Effect:** In determining whether an area is suitable for wilderness designation, the BLM will give special attention to adverse or favorable social and economic effects.
- f. **Consistency with Other Plans:** In determining whether an area is suitable for wilderness designation, the BLM will consider and document the extent to which the recommendation is consistent with officially approved and adopted resource-related plans of state and local governments, and Indian tribes, as required by FLPMA and BLM planning regulations.

VEGETATION MANAGEMENT ISSUES

ISSUE 6: AREAS EXIST THAT ARE IN LESS THAN GOOD CONDITION AND PRODUCING LIVESTOCK FORAGE BELOW POTENTIAL.

The central objective of the grazing management program is to manage livestock grazing in such a manner as to protect and improve rangeland condition and productivity. This objective will be accomplished through implementation of grazing systems which may require range improvements concurrent with a program of rangeland monitoring.

Range improvement efforts should be designed to improve and enhance rangeland condition, facilitate the orderly administration of public lands, and benefit the widest variety of possible uses. Range improvements include fencing, water development, and vegetation manipulation, as well as any other facilities, structures, or projects which meet the above objectives.

Range improvement needs are site specific and are therefore outlined in individual activity plans such as Allotment Management Plans, Habitat Management Plans, and Wild Horse Management Plans. Nevertheless, all range improvements impact many resource values in a given area, and certain considerations apply to general types of range improvements regardless of their specific location or primary intended purpose.

Planning Criteria

1. Water
 - a. Design water developments to manage the rangeland resource and to accommodate the needs of the animals which can reasonably be expected to use the water.
 - b. Ensure that the public investment in all water developments is protected.
2. Fencing
 - a. Restrict fencing to the minimum amount necessary to meet management objectives.
 - b. Ensure that fencing conforms to bureau standards established for the animals in that area.
 - c. Coordinate with users and take precautions to avoid problem maintenance areas.
3. Vegetation Manipulations
 - a. Consider vegetation manipulation on sites

where production of desirable plant species is less than 25 percent of potential or where significant noxious weed problems occur.

- b. Determine the kind of manipulation to be used, considering site-specific objectives and constraints described in activity plans and outlined as follows:

1. Use burning where a desirable understory exists for release and where overstory species can be controlled by fire.
2. Use herbicides to control brush where a desirable understory exists for release but where overstory species are not controllable by fire, or for control of noxious weeds.
3. Use mechanical brush removal where neither fire nor herbicides are suitable.
4. Use seedings/plantings where desired or in combination with one of the above.

- c. Seeding/planting mixtures will consist of native species, unless otherwise provided in activity plans.

4. General: Ensure that all range improvement undertakings are cost effective.

ISSUE 7: WILD HORSE POPULATIONS MUST CONTINUE TO BE MANAGED IN THE SIX EXISTING HERD USE AREAS WITHIN THE CARRYING CAPACITY OF THE RANGE WHILE MAINTAINING THE HEALTH AND VIABILITY OF THE HERDS.

Wild horse management is governed by the Wild and Free Roaming Horse and Burro Act of December 15, 1971, as amended. The purpose of the Act is to ensure the preservation of a unique feature of our Western heritage, as well as to prevent undue competition among wild horses, livestock, and big game, which can result in damage to range resources.

Planning Criteria

1. Maintain wild horse use in areas where wild horses occurred on December 15, 1971 and land ownership patterns are compatible with management

of wild horses.

2. Establish population levels by determining minimum numbers necessary to maintain viable herds and maximum numbers compatible with vegetation requirements.

ISSUE 8: TERRESTRIAL WILDLIFE HABITAT IS GENERALLY IN POOR OR FAIR CONDITION AND BLM IS REQUIRED TO PROTECT AND ENHANCE WILDLIFE HABITAT.

Managing wildlife habitat involves providing the essential habitat elements of food, cover, water, and space, as well as ensuring compatibility with other resources and uses.

Planning Criteria

1. Implement wildlife management actions in the following order of priority:
 - a. Maintain existing projects.
 - b. Eliminate hazards to wildlife, e.g. fence modification in big game habitat, fence/protection and development of important spring meadow complexes.
 - c. Mitigate habitat conflicts among wildlife and other multiple uses.
 - d. Construct new projects.
2. Determine relative needs for new habitat development projects by considering the degree of resource damage or conflicts occurring.
3. Consider chaining, burning and seeding to desirable browse species in areas where insufficient forage exists to meet demands of reasonable numbers of big game.
4. Protect special habitat features and special wildlife use areas, through ACEC designation or other means considering:
 - a. The diversity and/or abundance of species use,
 - b. The relative scarcity of the type of feature in the general area,
 - c. The irreplaceability of the feature, and
 - d. The degree to which one or more wildlife species may depend on the feature/area for survival.

**ISSUE 9: THERE IS A SIGNIFICANT AMOUNT OF
AQUATIC AND RIPARIAN HABITAT IN POOR AND FAIR
CONDITION.**

Habitats associated with water are relatively scarce and are highly productive in terms of plant and animal species diversity and abundance. They are important sources of food, water, and cover for most animal species and are popular human use areas.

Planning Criteria

1. Retain existing wetland/riparian/stream habitat under BLM administration.
2. Manage and/or enhance wetland and riparian areas to improve them to, or maintain them in at least a good condition class.
3. Special management considerations will be considered for areas in the following order of priority:
 - a. Those containing T and E and/or protected sensitive species.
 - b. Those with existing or potential sport fishing use.

**ISSUE 10: PUBLIC DEMAND HAS INCREASED FOR
WOODLAND RESOURCES INCLUDING FUELWOOD,
CHRISTMAS TREES, AND OTHER PRODUCTS.**

The increasing demand for wood products necessitates a management program which will maintain or improve the supply of these commodities.

Planning Criteria

Determine areas to be managed for sustained yield and develop management techniques by species and project, considering:

- a. Present volume of products,
- b. Volume production capability,
- c. Reproduction potential, and
- d. Conflict with other resources.

CHAPTER 2

PROPOSED RESOURCE

MANAGEMENT PLAN

CHAPTER 2

PROPOSED

RESOURCE MANAGEMENT PLAN

Goal: The Proposed Resource Management Plan, covering 4.1 million acres of public land, emphasizes a balanced approach to land management in the resources area. Fragile and unique resources would be protected while not overly restricting the ability of other resources to provide economic goods and services. It is a combination of the Resources Production, Midrange, and Resource Protection Alternatives and was analyzed in the DEIS as the Preferred Alternative. However, it differs in that where these alternatives employ a blanket set of management actions on a resource area wide basis, this plan chooses the best management action for each issue to fit the specific RCA. Table 2-5 of the DEIS shows the detailed management actions of this proposed plan by RCA.

OBJECTIVE/MANAGEMENT ACTIONS

Each resource issue listed below contains an objective statement to be met under this plan, followed by the management actions proposed to attain that objective.

ISSUE 1: LANDS

Objective: To allow disposals, land tenure adjustments, and land use authorizations based on long range goals. These goals are to identify lands to be disposed of or retained and administered for multiple use. These identifications are based on land manageability and quality of resource values and are shown on Map 2-7 of this FEIS.

Short and Long-Term Management Action: Dispose of 90,000 acres, including community expansion lands, primarily through public sale.

ISSUE 2: CORRIDORS

Objective: To determine designated corridors and identified planning corridors in coordination with other multiple use objectives, including visual quality.

Short and Long-Term Management Actions: (see Map 2-9 of the DEIS).

1. Locate corridor routes on existing rights-of-ways whenever possible.
2. Meet selected corridor needs projected to the year 2020.
3. Propose or designation and/or identification 566 miles of transportation and utility corridors including some routes for the proposed White Pine and Thousand Springs Power Projects. Also included is a narrowed width of the MM-NN corridor segment and selection of the P-GG-Q corridor segment to protect wilderness quality of the South Pequop and Goshute Peak WSAs respectively.

ISSUE 3: ACCESS

Objective: To acquire legal access for routes which would enhance opportunities to use public land resources.

Long-Term Management Action: Acquire legal access for 38 roads (158 miles) considered as high priority for management of all resources.

ISSUE 4: RECREATION

Objective: To provide a wide range of recreation opportunities.

Short-Term Management Actions: (see Map 2-1 of the DEIS)

1. Upgrade facilities at the Ruby Marsh Camp-ground Special Recreation Management Area (SRMA).
2. Designate Salmon Falls Creek as a SRMA and manage Tabor Creek and Mary's River as Recreation Areas of Management Concern (RAMCs). Develop new facilities at these locations.
3. Designate the resource area "open" for ORV use except for 160 acres in the Ruby Marsh Camp-ground SRMA, where use would be "limited" to designated roads and trails.
4. Withdraw 160 acres at the Ruby Marsh Camp-ground SRMA from mineral entry.
5. Continue to extensively manage the remainder of the Wells RA for dispersed recreation.

ISSUE 5: WILDERNESS

Objective: To manage as wilderness those portions of the WSAs which are manageable as a wilderness area and for which wilderness is considered the best use of the lands.

Short-Term Management Actions: (see Maps 2-3 to 2-6 of the DEIS).

1. Recommend portions of the four WSAs totalling 159,881 acres as preliminarily suitable for wilderness designation.
2. Recommend portions of the four WSAs totalling 16,070 acres as nonsuitable for wilderness designation.

<u>WSA</u>	<u>Suitable Acres</u>	<u>Nonsuitable Acres</u>
Bluebell	48,308	7,357
Goshute Peak	65,585	4,185
South Pequop	37,573	3,517
Bad Lands	8,415	1,011
TOTAL	159,881	16,070

The nonsuitable areas include lands which do not meet the size criterion, are unnatural, are unmanageable as wilderness, include existing rights-of-way, and are rated by the GEM Assessment as having high energy and/or mineral potential. (Bureau of Land Management 1983).

Long-Term Management Action: Manage such areas as are designated as wilderness by Congress to preserve their wilderness characteristics in the long-term.

ISSUE 6: LIVESTOCK GRAZING

Objective: To provide for livestock grazing consistent with other resource uses resulting in an increase in 4912 AUMs from the three to five year average licensed use of 288,934 AUMs to a level of 293,846. This would be 1.7 percent over the three to five year licensed use and 22.5 percent below preference. Range improvements will be provided primarily in I Category allotments.

Short-Term Management Actions:

1. Develop activity plans and grazing systems on Category I allotments and grazing systems as needed on Category M and C allotments to allow for natural recovery of range condition while considering multiple use values.
2. Construct 265 miles of fence, drill 65 wells, construct 5 reservoirs, develop 30 springs, and install 80 miles of pipeline to improve livestock distribution and utilization of vegetation.
3. Seed 37,500 acres, excluding areas identified for disposal under the various land laws, to provide for spring forage and allow natural recovery of the native range. Prescribe burn (without seeding) 27,000 acres and spray (without seeding) 1,500 acres where understory is adequate to provide natural revegetation.

Long-Term Management Action: Monitor and adjust grazing management systems and livestock numbers as required.

ISSUE 7: WILD HORSES

Objective: To continue management of the six existing wild horse herds (see Map 3-4 of the DEIS) consistent with other resource uses.

Short and Long-Term Management Actions:

1. Continue to monitor wild horse populations and habitat conditions.
2. Conduct gatherings, of excess wild horses as necessary so as to maintain populations within a range from 550 to 700 animals.

3. Construct six water development projects (catchment type) with a storage tank and trough.
4. Remove wild horses from private lands if required.

ISSUE 8: TERRESTRIAL WILDLIFE HABITAT

Objective: To conserve and/or enhance wildlife habitat to the maximum extent possible while eliminating all of the fencing hazards in crucial big game habitat, most of the fencing hazards in noncrucial big game habitat, and all of the high and medium priority terrestrial riparian habitat conflicts in coordination with other resource uses.

Short-Term Management Actions:

1. Modify 475 miles of existing fences within crucial and 175 miles within noncrucial big game habitats that do not meet Bureau specifications.
2. Protect, enhance, and/or develop 250 spring sources for their wildlife values.
3. Designate and manage 6,200 acres as the Salt Lake ACEC to protect and enhance peregrine falcon habitat (see Map 2-10 of the DEIS).

Short and Long-Term Management Actions:

1. Maintain all existing wildlife projects.
2. Continue to monitor the interaction between wildlife habitat condition and other resource uses and consider adjustments in livestock seasons of use to improve or maintain only essential and crucial wildlife habitats.
3. Improve habitat in areas identified as potential reintroduction sites for native species of wildlife as previously identified by the Nevada Department of Wildlife (NDOW). Prior to improvement of bighorn sheep habitat in the Spruce/Goshutes and Pilot/Crittenden RCAs, further study of conflicts between bighorn and domestic sheep will be undertaken in cooperation with NDOW.
4. Manage 2,600 acres of nonaquatic riparian aspen and 1,000 acres of mountain mahogany to improve deer and elk habitat.
5. Chain or burn, and seed 5,500 acres to improve crucial big game habitat.

6. Identify, in coordination with woodland products management, about 50,000 acres of crucial deer winter habitat for improvement.

7. Apply time of year restrictions on leaseable and/or saleable mineral development to protect crucial deer winter range and sage grouse strutting and nesting habitats.

ISSUE 9: RIPARIAN/STREAM HABITAT

Objective: To improve high and medium priority riparian/stream habitat to at least a good condition and prevent undue degradation of all riparian/stream habitat due to other uses.

Short-Term Management Action: Improve 1,007 acres/38.2 miles of deteriorated high and medium priority riparian/stream habitat using techniques which would result in a minimum improvement of 30 percent of its habitat condition within the short-term.

Long-Term Management Actions:

1. Improve an additional 1,511 acres/57.3 miles of deteriorated high and medium priority riparian/stream habitat using techniques with results described above.
2. Manage nondeteriorated areas to prevent a decline to less than good condition.
3. Manage new road construction and mining activities within riparian zones.

ISSUE 10: WOODLAND PRODUCTS

Objective: To achieve a sustained yield of woodland products and provide as wide a variety of products and services as possible to both the general public and commercial users.

Short and Long-Term Management Actions:

1. Implement intensive management of Christmas tree cutting on the entire 600,000 to 700,000 acres of woodlands.
2. Using the sustained yield concept, implement management of fuelwood harvesting to meet the present annual demand of approximately 1,300 cords. Open additional live and dead fuelwood and post harvesting areas to meet both increasing general public and commercial demands.

3. Manage salvage cuts for both the general public and commercial users on areas where pinyon-juniper conversions for wildlife or livestock management enhancement would occur.
4. In coordination with terrestrial wildlife management, promote the sale and harvest of 75 percent canopy cover removal of woodland products on about 50,000 acres of crucial deer winter habitat.
5. Open pinyon pine ranges that have good or better crops of pine nuts to pine nut collecting.
6. Implement techniques such as fire management and harvesting practices to rejuvenate deteriorating aspen stands.

IMPLEMENTATION

There are three major decision levels in the Bureau planning system:

1. Policy Level - national policy and program development guidance, supplemented by State Director guidance, constitutes this policy level.
2. Resource Management Plan (RMP) Level - multiple use management decisions for a defined geographic area are made.
3. Activity or Plan Implementation Level - detailed, site-specific management actions are developed. Activity plans include wildlife habitat management plans (HMPs), allotment management plans (AMPs), recreation area management plans (RAMPs), and wilderness management plans.

Implementation of the proposed RMP will take place through monitoring, consultation, and coordination. Coordinated Resource Management and Planning (CRMP) is an advisory process that brings together all interests concerned with the management of resources in a given area; landowners, land management agencies, wildlife groups, wild horse groups, and conservation organizations and is the recommended public process through which consultation and coordination will take place. Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies, consultation and coordination, baseline inventory, or a combination of these.

Livestock Grazing Management

To implement the proposed plan, a grazing

management program will be proposed to improve or maintain the public land resources through a selective management approach to rangeland management. This approach is based on the concept that an allotment's resource characteristics, management needs, and potential for improvement can be identified and the timing and intensity of the management actions should be varied according to an allotment's identified needs and potential. The purpose of the proposed grazing management program is identified by the following general objectives:

1. Authorize livestock grazing of the public rangelands under the principles of multiple use and sustained yield.
2. Protect, maintain, and improve the rangeland resources through sound land use and grazing management decisions.
3. Conduct the level of soil and vegetation inventories necessary to support management decisions and provide a baseline for monitoring programs.
4. Increase and encourage systematic cooperation, consultation, and coordination with rangeland users and intermingled landowners as part of the land use and grazing management decision making process.
5. Monitor rangeland resources and livestock use to assist in determining proper stocking levels and measure progress toward achieving management objectives.
6. Determine appropriate stocking levels (including proper season and area of use) based on monitoring data and authorize livestock grazing consistent with those stocking levels.
7. Initiate cost effective rangeland improvements that will help improve the condition of the lands for livestock grazing, wildlife habitat, wild horses and watershed protection.

To facilitate the selective management approach, BLM has developed three categories into which allotments are grouped according to their potential: maintain (M), improve (I), and custodial (C). Objectives for these categories are to: (1) maintain current satisfactory condition, (2) improve current unsatisfactory condition, and (3) manage custodially while protecting existing resource values. The characteristics which

pertain to these three categories are found beginning on page 2-27 of the DEIS.

Specific Implementation Procedures

After publication of the Final RMP/EIS and categorization of allotments, implementation actions by category would generally be prioritized as shown on Table 2-6 of the DEIS. Flexibility of livestock operations, as appropriate, would be allowed on all allotments through terms and conditions of permits, leases, and AMPs.

Livestock Grazing Treatments

Grazing systems would include one or more of the following treatments in combination.

Treatment 1: Rest from livestock grazing for two consecutive growing seasons (approximately April 1 of one year to August 31 of the following year). Two growing seasons of rest would allow key management species to improve vigor and increase litter accumulation, seed production, and seedling establishment.

Treatment 2: Rest from livestock grazing at least one year in both the spring (April 1 to May 30) and summer (June 1 to August 31) during each three or four year cycle.

Treatment 3: Graze each pasture at some time during each grazing year.

Treatment 4: Graze no pasture more than twice in the same growing season (spring or summer) during any three or four year cycle.

Treatment 5: Graze livestock from midsummer to late fall only (approximately July 16 to November 15), and rest during the spring or summer the following year to improve the vigor, density, and reproduction of key grass species.

Treatment 6: Provide rest from livestock grazing for two years until seedlings are established or until it is determined that a vegetation manipulation or recovery project is unsuccessful. This treatment provides the protection necessary for establishment or recovery of key management species following wildfire, prescribed burning, and seeding or spraying projects.

Treatment 7: Defer livestock grazing from early spring to midsummer each year (approximately April 1 to June 30). Improved vigor and repro-

duction for key management species in each allotment would result.

Treatment 8: Allow grazing on winterfat/Nutall saltbush up to 80 percent utilization during the dormant period (approximately November 1 to March 1), and rest from grazing March 1 to October 31 each year. This treatment would not apply to the Mary's River, O'Neil/Salmon Falls, and Goose Creek RCAs.

Estimated Cost of Implementation

Cost of implementation is difficult to determine, given the fact that information on miles of fence, acres of seeding, and number of water developments is somewhat conjectural at this point. Nonetheless, costs of implementing the Proposed Resource Management Plan are estimated below by resource.

<u>Item</u>	<u>Cost</u>
Recreation Development	\$ 30,000
Livestock Grazing Improvements	\$2,429,500
Wild Horse Improvements	\$ 90,000
Wildlife Habitat Improvements	\$1,509,000
Riparian Habitat Improvement	\$ 585,000
TOTAL	<u>\$4,643,500</u>

NOTE: These costs are for labor and materials only. They do not include BIM overhead costs for environmental assessment and contract preparation and contract supervision.

MONITORING

Monitoring was initiated in 1981 in the Wells RA so that initial livestock stocking rates could be determined as early as 1984 and adjusted later as additional data dictates. Monitoring methods include Utilization, Actual Use, Climatic Data, and Condition and Trend and are explained on page 2-30 of the DEIS.

The monitoring program for those allotments in the M and C categories would be of low intensity. For the I category allotments, monitoring intensity would be variable, focusing on the effects of management actions on range condition. Additional monitoring would be conducted in crucial

wildlife and wild horse areas. Information gained through these efforts and other studies would be used in making any grazing decisions.

The monitoring program, along with input through CRMP, would determine the time at which range management action would be needed in a particular allotment. A partial list of possible actions includes change in livestock season of use, construction of fence, water development, vegetation removal (chaining, controlled burns) and reseeding, and livestock adjustment. The monitoring program would be an integral part of the Proposed Resource Management Plan.

STANDARD OPERATING PROCEDURES

Certain requirements are inherent in the implementation of the Proposed Resource Management Plan. These requirements, or Standard Operating Procedures, are designed to mitigate impacts stemming from management objectives or the construction of support facilities necessary to implement any action by the Bureau or persons authorized by the Bureau. These are found beginning on page 2-31 of the DEIS and will be applied to actions of the proposed plan.

CHAPTER 3

REVISIONS

AND ERRATA

CHAPTER 3

REVISIONS AND ERRATA

SUMMARY

Revise Table S-1, DEIS page S-3 as follows.

<u>ALTERNATIVE</u>	<u>ISSUE</u>	
	<u>RECREATION</u>	<u>LIVESTOCK GRAZING</u>
Resource Production		383,452 AUMs 33% Increase
Midrange	3 Recreation Areas	
Resource Protection		176,223 AUMs 39% Decrease
Preferred	4 Recreation Areas	

Revise Table S-2, DEIS page S-4 as follows.

	<u>Change with No Action</u>
Market Value of AUMs	0

CHAPTER 1

See Chapter 1 of this FEIS.

CHAPTER 2

DEIS page 2-2, MANAGEMENT ALTERNATIVES. Replace the second paragraph with the following four paragraphs.

For discussion of the alternatives, excluding the No Action Alternative, the resource area was separated into three management classifications. These are Disposal (D), Retention/Consolidation (R/C), and Retention/Management (R/M) (see Map 2-7). These were delineated on the basis that disposal areas are difficult to manage and have essentially no resource values and resource values are fewer and consequently, less cost effective to manage in R/M areas compared to R/C areas. The purpose of the three designations are to categorize these land types for their suitability for various land tenure adjustments.

The lands in the Disposal (D) category can be disposed of by any available means, however, the primary vehicle, particularly around communities, would be through public sale. Lands within the "D" category typically meet the FLPMA sale criteria.

The Retention/Management (R/M) areas are generally, as the name suggests, to remain under BIM management. Unlike the "D" lands, "R/M" lands do not typically meet FLPMA sale criteria. They are, however, suited for exchange for private lands within the Retention/Consolidation (R/C) areas and development under the agricultural land laws. Exchanges that would acquire private lands within the "R/M" category are generally discouraged.

Finally, the Retention/Consolidation (R/C) lands are high resource value public lands that are to be retained and managed intensively and consolidated where possible to enhance management opportunities. Disposals of any nature will generally not occur in the "R/C" areas. The exceptions to this would only occur adjoining existing private lands and only to resolve

specific management problems, facilitate land exchanges within the "R/C" areas, or permit agricultural entry where state water law indicates priority water applications of the adjoining land owner exist. No specific management actions will be analyzed for the "R/M" or "R/C" areas and, therefore no further consideration will be given them.

Table 2-1, pages 2-3 to 2-6 of the DEIS has been corrected and has been reprinted as Table A-1 of this FEIS.

DEIS page 2-9, ISSUE 1: LANDS, Short and Long-Term Management Action. Revise 93,150 to 90,000. Make the same change on page 2-22.

DEIS page 2-9, ISSUE 3: ACCESS, Long-Term Management Action. Revise 11 to 14 and 67 to 87.

DEIS page 2-10, Issue 5: WILDERNESS. Add the following after the table. "Long-Term Management Action: Manage such areas as are designated as wilderness by Congress to preserve their wilderness characteristics in the long-term." Make the same additions to pages 2-14, 2-19, and 2-23.

DEIS page 2-10, Issue 6: LIVESTOCK GRAZING, Objective. Revise 94,788 to 94,518; 383,722 to 383,452 and 1.2 to 1.1.

Tables 2-2, 2-3, 2-4, and 2-5 of the DEIS have been revised. Those revisions necessary are contained in Table 3-1 found on page 3-6 of this FEIS.

DEIS page 2-13, ISSUE 3: ACCESS, Long-Term Management Action. Revise 35 to 38 and 138 to 158. Make the same change on page 2-22.

DEIS page 2-14, RECREATION, Long-Term Management Action. Delete the action pertaining to Crittenden Reservoir. Make the same deletion from page 2-23.

DEIS page 2-15, fourth short and long-term terrestrial wildlife habitat management action. Replace the word "habitat" with "to improve deer and elk habitat." Make the same revision to pages 2-20 and 2-24.

DEIS page 2-15, fifth short and long-term woodland products management action. Reword to read "open pinyon pine ranges that have good or

better crops of pine nuts to pine nut collecting." Make the same change to page 2-25.

DEIS page 2-23, LIVESTOCK GRAZING, first Short-Term Management Action. Change 35,500 to 37,500.

Revise Table 2-7, DEIS page 2-30 as follows.

	<u>Preferred</u>
Livestock Grazing Improvements	\$2,429,500
TOTAL	\$4,643,500

DEIS page 2-30, MONITORING, Utilization. Modify the last sentence to read "Grazing areas would be managed for a maximum combined utilization by livestock and wildlife of 55 percent for perennial grasses and forbs and 45 percent for shrubs."

DEIS page 2-33, 25th standard operating procedure. Change "overflow" to "overflow."

DEIS page 2-33. Add the following as the 32nd standard operating procedure. "Lands will be retained in Federal ownership if needed to protect unique resource values."

DEIS page 2-33. Add the following as the 33rd standard operating procedure. "All areas open to leasing as listed in the Elko District Oil, Gas, and Geothermal EAR will remain open."

Maps 2-1, 2-8, 2-9 and 2-11 have been revised and are located at the end of this chapter of the FEIS.

CHAPTER 3

DEIS page 3-4. Delete the second full paragraph of the first column pertaining to recreation opportunities at Crittenden Reservoir.

DEIS page 3-4, Bluebell WSA, third paragraph, last sentence. Revise "5,000-6,000" to "up to 10,000."

DEIS page 3-5, second paragraph, second sentence. Revise "5,000 to 6,000" to "8,000 to 10,000."

DEIS page 3-10, Fencing Hazards, second paragraph. Delete the last sentence and insert

the following sentences. "Fences within the resource area have undoubtedly caused a far greater mortality problem to deer than they have to antelope. Deer are frequently caught in fences in isolated areas not readily witnessed. A local study documented that of 144 mortalities, 13 percent were a result of deer becoming entrapped in barbed-wire fences (Papez 1976)."

DEIS page 3-15, Locatable Minerals, last paragraph. Add the following sentence to the paragraph. "The geologic environment of the Wells RA is also favorable for significant gold discoveries."

Revise Table 3-8, DEIS page 3-17 as follows.

<u>Community</u>	<u>Projected Populations</u> (High, Medium, Low)	
	<u>1985</u>	<u>1990</u>
West Wendover	1,500	4,500
	800	2,400
	500	1,500
Total Wells RA	10,900	16,500
	7,300	11,100
	4,300	5,600

DEIS page 3-23, second column, fourth full paragraph. Delete the first sentence.

DEIS 3-25, Condition, second paragraph, third sentence. Revise the word "finalized" to "determined."

Revise Table 3-12, beginning on page 3-26 of the DEIS, as follows.

<u>Vegetation</u> <u>Type</u>	<u>Associated</u> <u>Species</u>
Perennial Forbs	balsamroot, lupine
Mountain Shrub	Add Idaho Fescue

Revise Table 3-13, DEIS page 3-29, as follows.

Delete Astragalus miser var. oblongifolius and add Triglochin maritima, common name Arrowgrass.

DEIS page 3-30, second column, last paragraph. Delete the first sentence.

DEIS page 3-31, Surface water, third paragraph, first sentence. Revise the sentence to read "Springs and seeps (approximately 830) in the Wells RA vary in size and flow from less than 1 gallon per minute (gpm) to over 50 gpm."

Maps 3-2 and 3-3 have been revised and are located at the end of this Chapter of the FEIS.

Revise the legend for Map 3-3, DEIS page 3-36 as follows.

<u>RCA</u>	<u>NUMBER</u>	<u>NAME</u>
Spruce/ Goshutes	13	Chase Springs
	14	White Horse
	15	Sugarloaf
	16	Leppy Hills
	17	Spruce

CHAPTER 4

DEIS PAGE 4-3, ISSUE 5: WILDERNESS, fourth assumption. Revise as follows. "Impact conclusions (except for woodland products) are based on..."

DEIS page 4-3, ISSUE 6: LIVESTOCK GRAZING, first assumption, first sentence. Strike the word "completed."

DEIS page 4-4, second "Other Assumption." Reword to read "... assume that the entire area having time of year restrictions would be totally..."

DEIS page 4-7, second column, third paragraph, first sentence. Revise 35 to 38.

DEIS page 4-7, ISSUE 4: RECREATION, second paragraph, second sentence. Revise the sentence to read "Visitors at Ruby Marsh Campground would continue to utilize facilities in need of rehabilitation."

DEIS page 4-8, first column, second full paragraph. Delete this entire paragraph pertaining to Crittenden Reservoir.

DEIS page 4-10, ISSUE 8: TERRESTRIAL WILDLIFE HABITAT. Replace the fourth paragraph with the following two paragraphs.

This alternative would also not designate any wilderness areas. Probably the single largest conflict with the reintroduction of bighorn sheep

WILDERNESS DESIGNATION AND GOSHUTE PEAK WSAS and on Pilot Peak in the Pilot/Crittenden RCA is that the identified habitat is currently being grazed by domestic sheep. This constitutes a potential problem with animal health if reintroduction were to occur.

With wilderness designation — as in the other DEIS alternatives — the Bureau and NDOW would consider a more active program towards reintroduction because man-made disturbance would be held to a minimum and habitat improvement projects could be easily coordinated. Therefore, significant short and long-term adverse impacts to bighorn sheep reintroduction occur as result of no wilderness designation.

Tables 4-3, 4-6, 4-11, 4-16, and 4-19 of the DEIS have been revised. Those revisions necessary are contained in Table 3-2 found on page 3-7 of this FEIS.

DEIS page 4-19, ISSUE 1: LANDS, first sentence
Revise 93,150 to 90,000.

DEIS page 4-19, second column, second full paragraph, first sentence. Add the following reference "(Olendorff, Miller, and Lehman 1981)." Add the same reference to pages 4-31 and 4.43.

DEIS page 4-19, ISSUE 3: ACCESS, second paragraph, second sentence. Revise 11 to 14 and 67 to 87.

DEIS page 4-20, ISSUE 4: RECREATION, fifth paragraph. Delete this sentence dealing with Crittenden Reservoir.

DEIS page 4-21, second paragraph. Delete the last sentence.

DEIS page 4-21, ISSUE 6: LIVESTOCK GRAZING, second paragraph, third sentence. Spruce Goshutes. Revise 70,213 to 69,943.

DEIS page 4-31, ISSUE 3: ACCESS, second paragraph, second sentence. Revise 35 to 38 and 138 to 158.

DEIS page 4-32, RECREATION, second paragraph. Delete this entire paragraph pertaining to Crittenden Reservoir.

DEIS page 4-32, second column, first complete paragraph. Revise to read "Impacts would generally be the same..." Make the same revision on page 4-44.

DEIS page 4-44, RECREATION, third paragraph. Delete the words "Crittenden Reservoir" from the sentence.

DEIS page 4-44, LIVESTOCK GRAZING, second paragraph. Replace the paragraph with the following. "This alternative would reduce AUMs from the three to five year licensed use of 288,934 AUMs by 112,588 to a level of 176,376. This would be 39 percent below three to five year licensed use and 53 percent below preference. Reductions proposed by RCA are as follows: Cherry Creek (3469 AUMs, 30%); Spruce/Goshutes (24,535 AUMs, 50%); Mary's River (11,367 AUMs, 25%); O'Neil/Salmon Falls (46,545 AUMs, 65%); Goose Creek (3474 AUMs, 15%); Pilot/Crittenden (13,263 AUMs, 44%); Metro polis (8530 AUMs, 20%); and Ruby/Wood Hills (1375 AUMs, 9%). These reductions would be short and long-term significant adverse impacts to live stock grazing in the resource area and in all RCAs except Ruby/Wood Hills.

DEIS page 4-54, ISSUE 4: RECREATION, third paragraph. Delete the words "at Crittenden Reservoir and impacts."

DEIS page 4-58, Construction Sector, first paragraph, second sentence. Revise \$4,595,500 to \$4,643,500.

DEIS page 4-62, second column, number 10. Delete the words "as a result of implementing the management options in the RMP."

CHAPTER 5

No revisions necessary.

CHAPTER 6

DEIS page 6-2, I.C. Federal Agencies: Delete Water and Power Resources Service and insert Bureau of Reclamation.

APPENDICES

Table A3-1, DEIS page A3-2. Replace this table with Table A-2 beginning on page A-6 of this FEIS.

DEIS A5-9, second column, second paragraph, first sentence. Delete the words "Report of Impacts of" and insert "Economic Impact of."

Table A5-3, DEIS page A5-10. Delete the entire line across the page pertaining to "Fish (reservoir)." Also make the following revisions.

	Antelope	Deer	Fish (Stream)
Resource Production			4,000
Midrange			10,000
Resource Protection	175	17,587	20,000
Preferred			10,000

Table A5-4, DEIS page A5-11. Revise the source to read "Nevada Division of State Parks 1980."

GLOSSARY

DEIS page G-2. Add the following definitions.

DESIGNATED CORRIDOR: A 3 mile wide (where possible) passage on which existing utility transmission or transportation facilities are located for which a future need may be accommodated.

DESIGNATED CORRIDOR - LOW VISIBILITY: A 3 mile wide (where possible) passage on which existing utility transmission or transportation facilities are located for which a future need may be accommodated if the facility is not evident in the characteristic landscape.

REFERENCES

No revisions necessary.

TABLE 3-1

REVISIONS TO TABLES 2-2, 2-3, 2-4, and 2-5 OF THE DEIS

Issue/Action	Cherry Creek	Spruce/ Goshutes	Mary's River	O'Neil/Salmon Falls	Goose Creek	Pilot/ Crittenden	Metropolis	Ruby/Wood Hills	Wells RA
REVISIONS TO TABLE 2-2									
LANDS:								69,095 acres, in- cluding 360 acres for community expansion of Montello	90,000 Acres
ACCESS:	BLM Road # 1132		BLM Road #1070, 1074						14 Roads
	6 Miles		9 Miles	25 Miles					87 Miles
LIVESTOCK GRAZING:									
Seed Acres					6000			6500	
NA = Not Applicable									
REVISIONS TO TABLE 2-3									
ACCESS:	BLM Road #1132		Add BLM Road #1070, 1074	Delete "& ex- tension at Twin Meadows Ranch" and insert 1222					38 Roads
	6 Miles		14 Miles	34 Miles					158 Miles
RECREATION:						Delete Action			Manage 3 recreation areas
NA = Not Applicable									
REVISIONS TO TABLE 2-4									
ACCESS:				Delete "& ex- tension at Twin Meadows Ranch" and insert 1222					
NA = Not Applicable									
REVISIONS TO TABLE 2-5									
LANDS:								69,095 acres, in- cluding 360 acres for community expansion of Montello	90,000 Acres
ACCESS:	BLM Road #1132		Add BLM Road #1070, 1074	Delete "& ex- tension at Twin Meadows Ranch" and insert 1222					38 Roads
	6 Miles		14 Miles						158 Miles
RECREATION:						Delete Action			Manage 4 re- creation areas
NA = Not Applicable									

TABLE 3-2

REVISIONS TO TABLES 4-3, 4-6, 4-11, 4-16, and 4-19 of the DEIS

Issue/Impacts	Cherry Creek	Spruce/ Goshutes	Mary's River	O'Neil/Salmon Falls	Goose Creek	Pilot/ Crittenden	Metropolis	Ruby/Wood Hills	Wells RA
---------------	-----------------	---------------------	-----------------	------------------------	----------------	----------------------	------------	--------------------	----------

REVISIONS TO TABLE 4-3

ACCESS: Public access easements would be acquired	Public access easements would be acquired on a case-by-case basis as major difficulties arise. They would be of very small magnitude and would be beneficial to any affected resource (SB).								
Public access would be lost	Public access through routes important for any of the resource issues could be lost. →								
	1		6						38 Roads (SA)
	6		14	34					158 Miles (SA)
RECREATION: Recreation opportunities would be enhanced or degraded.						Delete "fishing degraded at Crittenden Reservoir (SA)."			

REVISIONS TO TABLE 4-6

ACCESS: Public access easements would be acquired	Public access easements would be acquired for access routes important for the public use and BLM administration of livestock grazing, woodland products, and minerals (SB).								
	1		2						14 Roads (SB)
	6		9	25					87 Miles (SB)

Public access would be lost Public access through routes important for public use and BLM administration of recreation, wilderness areas, wild horses, and terrestrial wildlife and riparian habitats would be lost (SA).
 0
 0

RECREATION: Recreation opportunities would be enhanced or degraded

Delete
 "fishing degraded at Crittenden Reservoir (SA)."

LIVESTOCK GRAZING:
 Licensed use increase

69,943 AUMs
 143% (SB)

94,518 AUMs
 33% (SB)

REVISIONS TO TABLE 4-11

ACCESS: Public access easements would be acquired

Public access easements would be acquired for access routes important for the public use and the BLM administration of all resources (SB)

1	6	10	38 Roads (SB)
6	14	34	158 Miles (SB)

Public access would not be lost

Public access through routes important for any of the resources would not be lost (SB). →

RECREATION: Recreation opportunities would be enhanced or degraded

Delete
 "Fishing enhanced at Crittenden Reservoir. Increase 300 angler days (SB)."

REVISIONS TO TABLE 4-16

ACCESS: Public access easements would be acquired

Public access easements would be acquired for access routes important for the public use and BLM administration of recreation, wilderness areas, wild horses, and terrestrial wildlife and riparian habitats (SB).

0
0

Public access would be lost

Public access through access routes important for public use and BLM administration of livestock grazing, woodland products, or minerals would be lost (SA).

1 2 0
6 9 5

9 Roads (SA)
63 Miles (SA)

RECREATION: Recreation opportunities would be enhanced or degraded

Delete "Fishing degraded at Crittenden Reservoir (SA)."

LIVESTOCK GRAZING:

Licensed use decrease	3469 AUMs 30% (SA)	24,535 AUMs 50% (SA)	11,367 AUMs 25% (SA)	46,545 AUMs 65% (SA)	3,474 AUMs 15% (SA)	13,263 AUMs 44% (SA)	8,530 AUMs 20% (SA)	1,375 AUMs 9% (NS)	112,558 AUMs 39% (SA)
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REVISIONS TO TABLE 4-19

ACCESS: Public access easements would be acquired

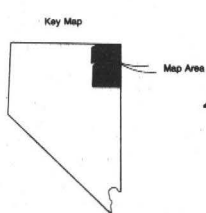
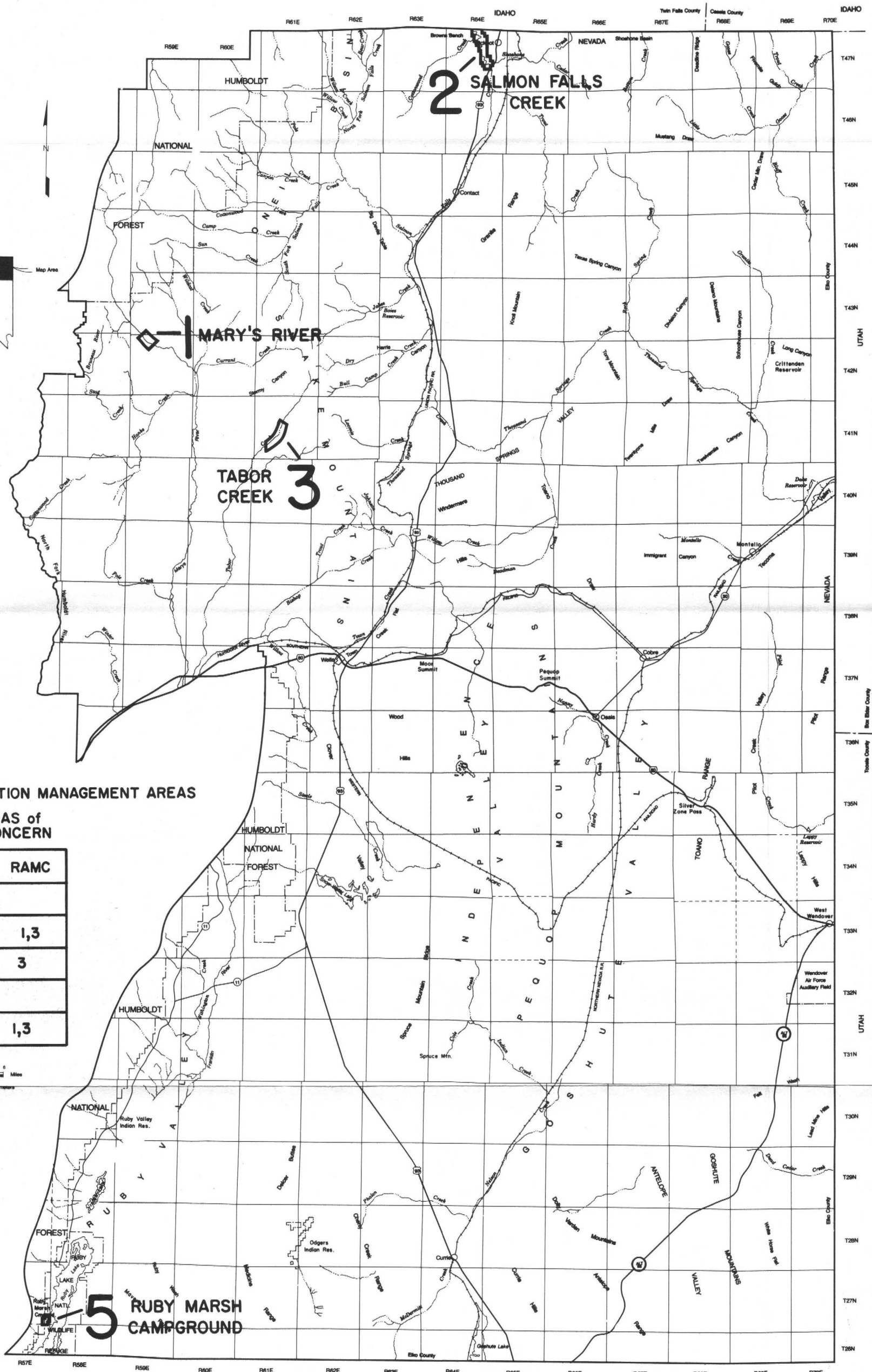
Public access easements would be acquired for access routes important for the public use and BLM administration of all resources (SB).

1 6 10
6 14 34

38 Roads (SB)
158 Miles (SB)

RECREATION: Recreation opportunities would be enhanced

Delete "Fishing enhanced at Crittenden Reservoir. Increase 300 angler days (SB)."



LEGEND

(SRMA) SPECIAL RECREATION MANAGEMENT AREAS

(RAMC) RECREATION AREAS of MANAGEMENT CONCERN

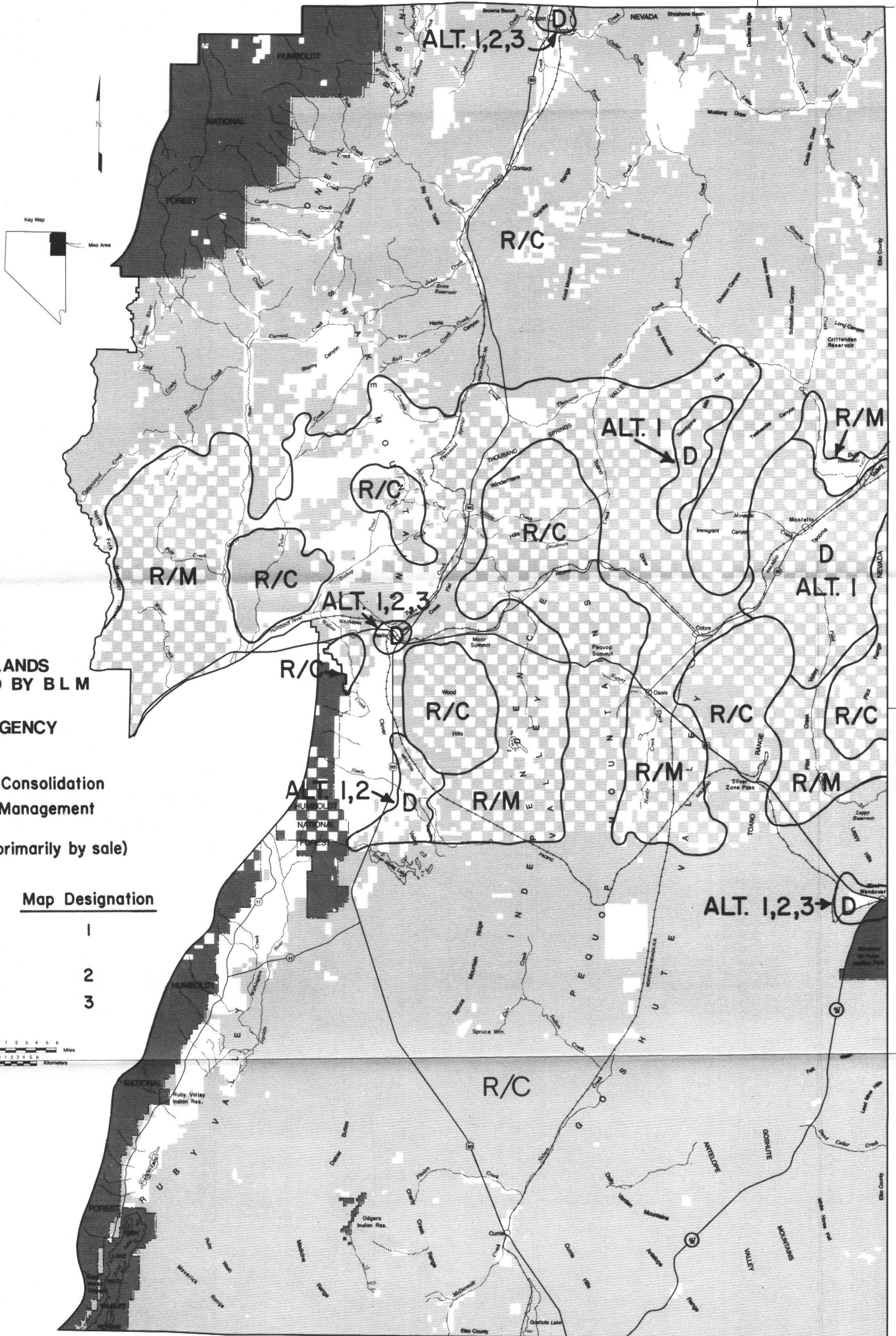
Alternative	SRMA	RAMC
No Action	5	
Resource Production	2,5	1,3
Mid-Range	2,5	3
Resource Protection	2,5	
Preferred	2,5	1,3



RECREATION MANAGEMENT

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WELLS RMP

1983



PUBLIC LANDS MANAGED BY BLM

OTHER AGENCY LANDS

R/C - Retention / Consolidation

R/M - Retention / Management

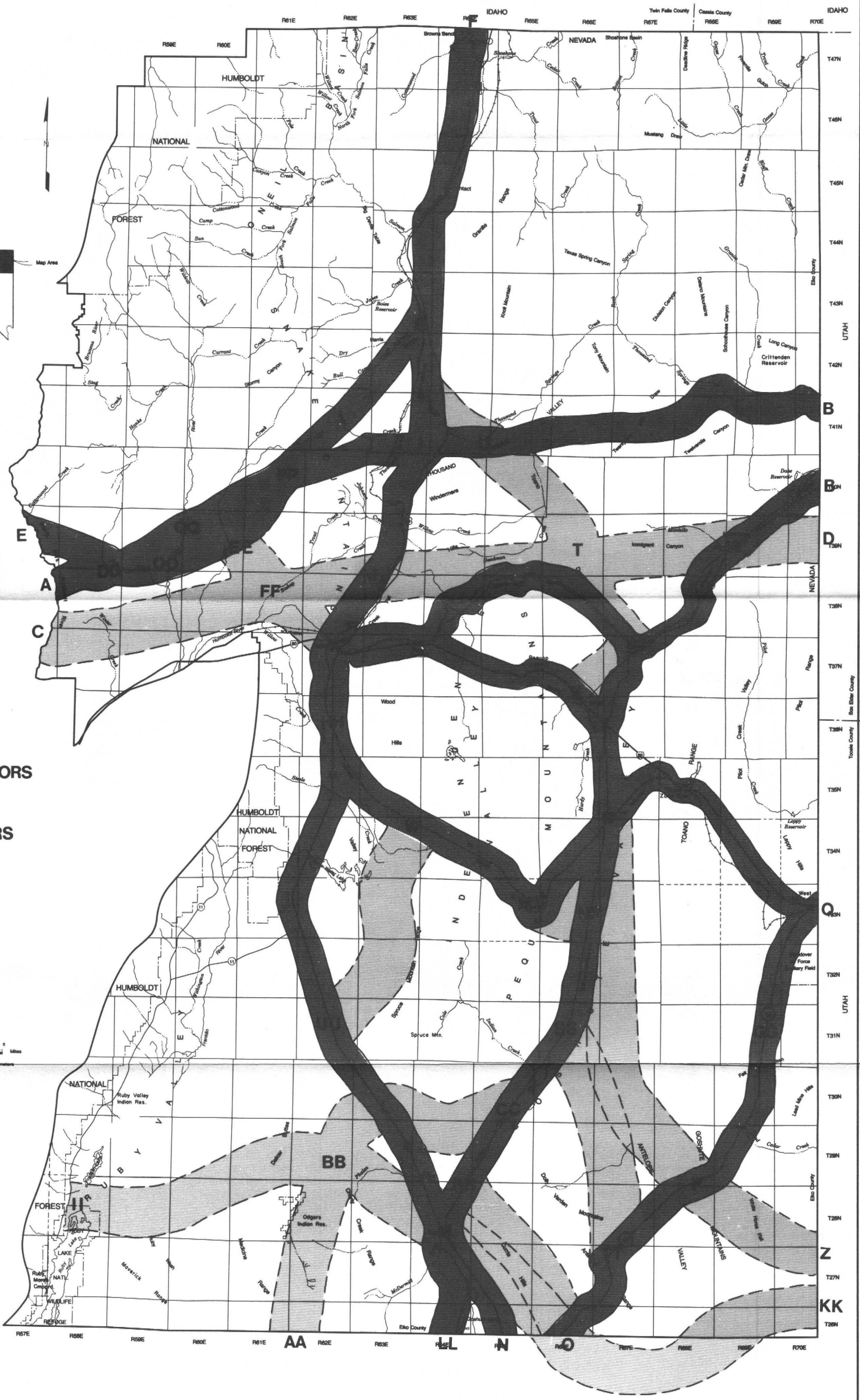
D - Disposal (primarily by sale)

Alternative	Map Designation
Production and Preferred	1
Midrange	2
Protection	3




LAND TENURE ADJUSTMENTS


UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT WELLS RMP



SECTIONALIZED TOWNSHIP

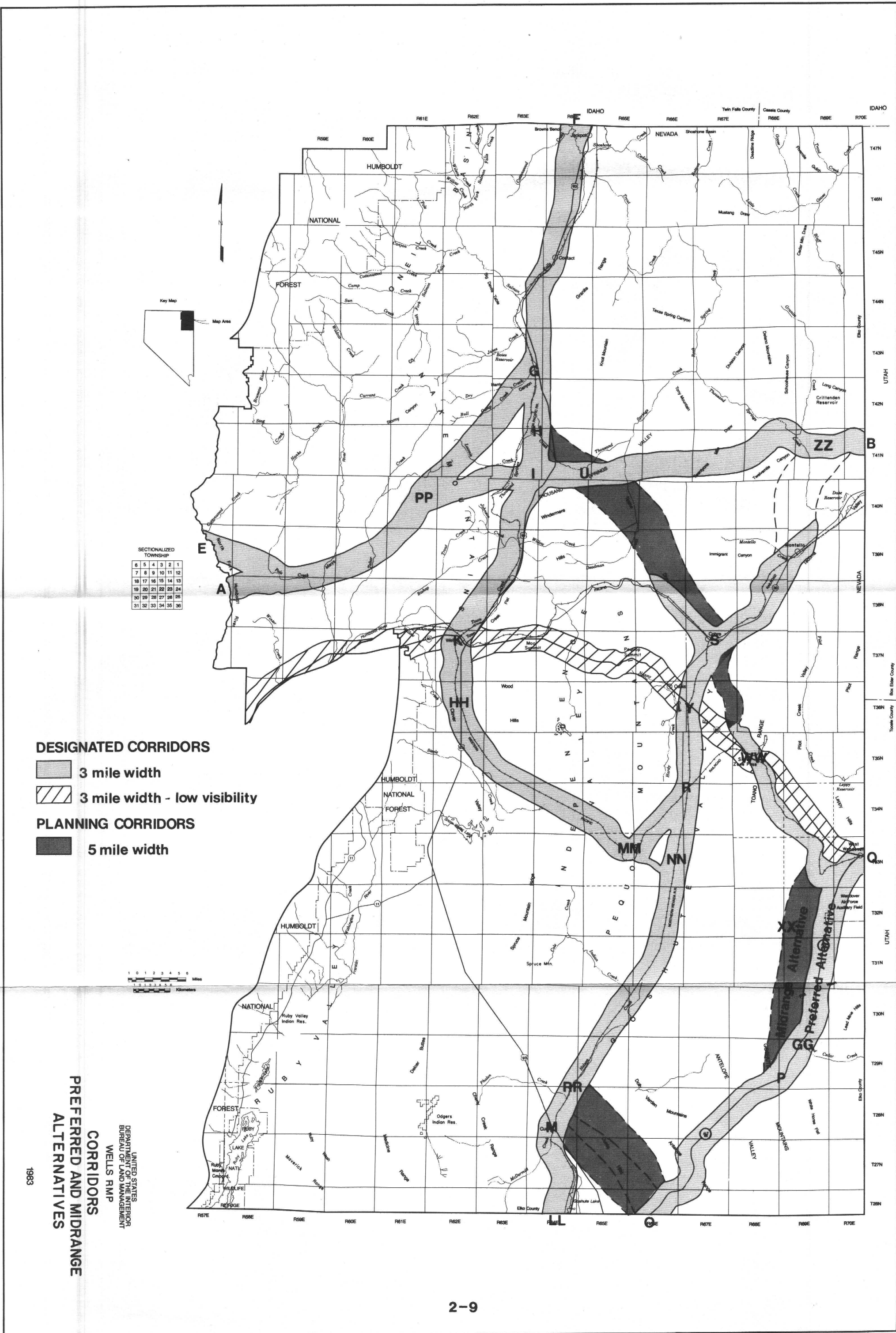
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

DESIGNATED CORRIDORS
 3 mile width

PLANNING CORRIDORS
 5 mile width



UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 WELLS RMP
CORRIDORS
RESOURCE PRODUCTION
ALTERNATIVE
 1983



DESIGNATED CORRIDORS

- 3 mile width
- 3 mile width - low visibility

PLANNING CORRIDORS

- 5 mile width

SECTIONALIZED TOWNSHIP

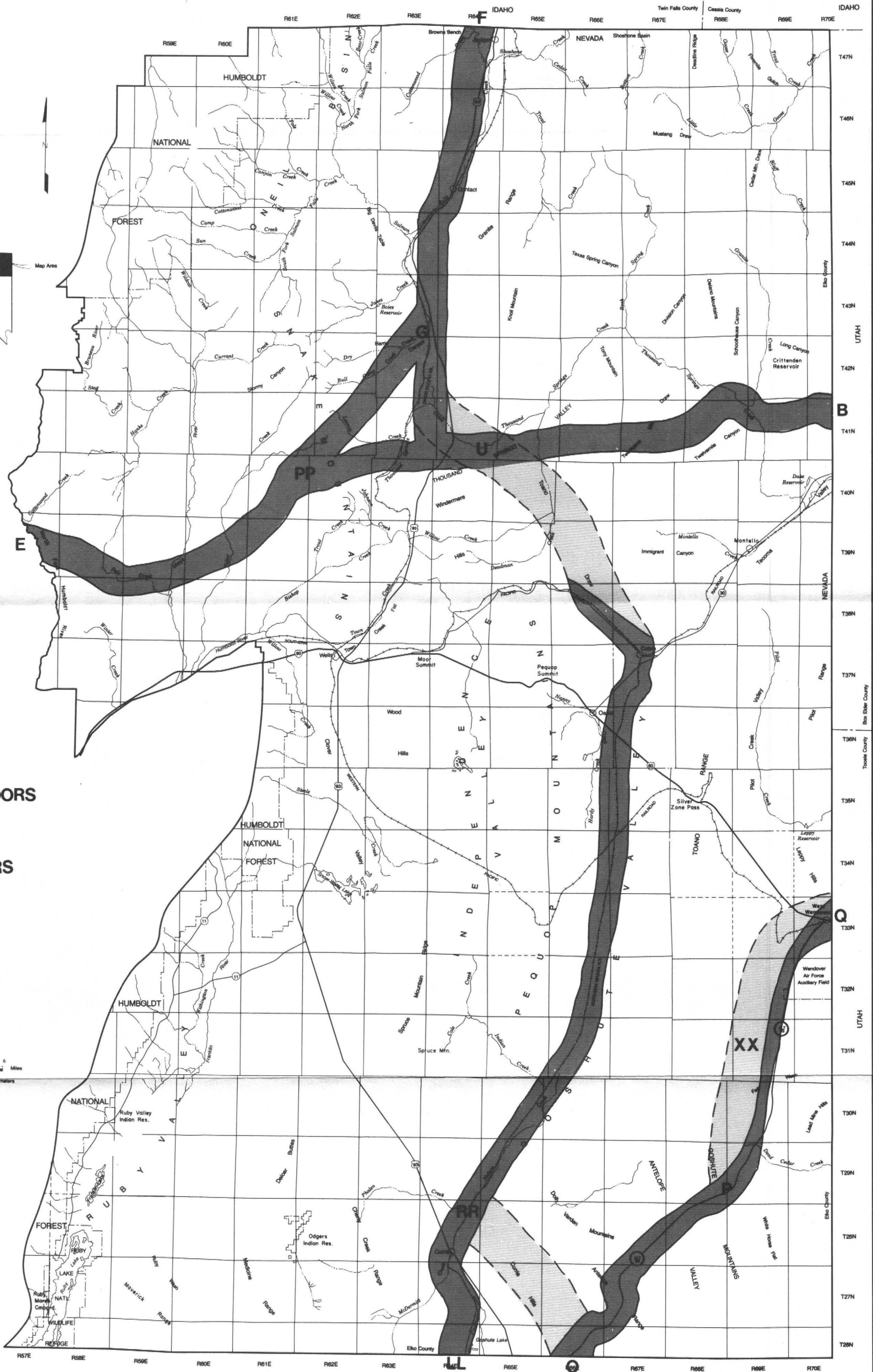
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36



**PREFERRED AND MIDRANGE
CORRIDORS
ALTERNATIVES**

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WELLS RMP

1983



DESIGNATED CORRIDORS

3 mile width

PLANNING CORRIDORS

5 mile width

SECTIONALIZED TOWNSHIP

6	5	4	3	2	1
7	8	9	10	11	12
13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36





**CORRIDORS
RESOURCE PROTECTION
ALTERNATIVE**

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WELLS RMP

1983



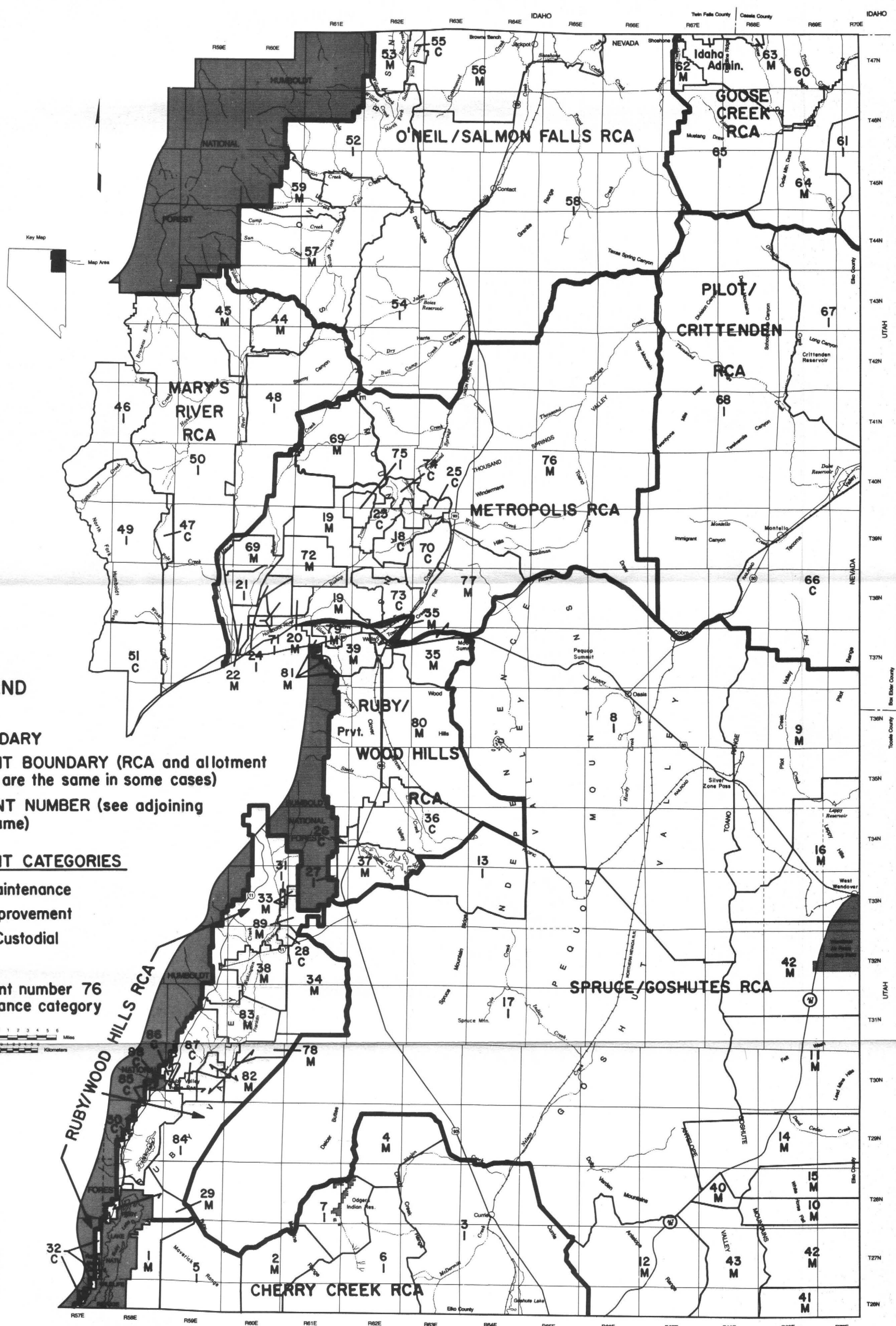
FEDERAL LANDS

-  BLM
- 1286 BLM ROAD NUMBER**
-  OTHER AGENCIES



UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 WELLS RMP
**ROADS IDENTIFIED AS
 HAVING IMPORTANT ACCESS NEEDS**

1983



LEGEND

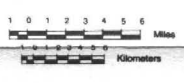
- RCA BOUNDARY
- ALLOTMENT BOUNDARY (RCA and allotment boundaries are the same in some cases)
- 76** ALLOTMENT NUMBER (see adjoining page for name)

ALLOTMENT CATEGORIES

- M**-Maintenance
- I**-Improvement
- C**-Custodial

EXAMPLE:

76-Allotment number 76
M-Maintenance category



UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 WELLS RMP
**RESOURCE CONFLICT AREAS (RCA)
 AND
 ALLOTMENT CATEGORIZATIONS**
 1983

CHAPTER 4

CONSULTATION

AND COORDINATION

CHAPTER 4

CONSULTATION AND COORDINATION

PUBLIC INVOLVEMENT

Communication and consultation with all interested public land users and other concerned people have been important components in the Wells RMP/EIS process and they will continue to be important in the decision making and implementation processes. Public participation will continue through such means as comment periods, news releases, Coordinated Resource Management and Planning (CRMP), and informational meetings.

The planning issues and criteria were developed after intensive input and review by the public. Initially, several public meetings were held in March and April of 1979 to identify issues of concern to individuals in the Wells RA. In addition, representatives of state and local governments, including the Elko Mayor and the Elko County Manager, and representatives of various user and interest groups (mining, livestock, environmental, and sportsmen) were contacted in November of 1979. This public input was combined with input from BLM staff specialists to identify and develop a set of planning issues.

A Federal Register notice of intent was published on May 23, 1980. This notice discussed issues to be considered in a general way and invited public comment and recommendations.

Planning criteria were developed to set standards and guidelines for planning to follow. A draft version of the issues and planning criteria was distributed to the public in January 1981 in The Sage, a district newsletter. About 350 copies were sent to selected individuals, elected officials, interest groups, and other agencies.

Another 4,000 copies were distributed as a supplement to the Elko Daily Free Press.

Fifty-seven responses were received. These included 33 individuals, four economic interest groups, two conservation groups, two "informal groups" (a family and an EIS consultant), and one university department spokesperson. A total of 38 respondents were residents of the Wells RA, while 12 were from the Reno-Carson City area and seven were from out of state.

The 57 public responses, along with comments received from the Nevada BLM State Office, were used to develop an initial set of planning issues and criteria. In July 1982, these were re-evaluated, with issues being restated as problem statements instead of general planning questions, and four issues being incorporated into other issues.

A second Federal Register notice was published on August 23, 1982. Its purpose was to present the revised issues noted above and the five alternatives to be analyzed in the EIS. This notice also initiated another 30-day public comment period.

Evening workshops to discuss the alternatives were held in Reno, Elko, and Wells, Nevada on September 13, 21, and 22, 1982. Total attendance at these sessions was 24 people representing a cross section of interests including the mining and livestock industries, state agencies, Sierra Club, and Earth First. Also, an open house was held in the Elko District Office in September 1982 during which 17 individuals met with Bureau personnel.

Twenty-five letters were received in addition to

the comments made at the above meetings and open houses. These were utilized, along with impact analyses, in developing the preferred alternative.

COORDINATION IN REVIEW
OF THE DRAFT RMP/EIS

The draft RMP/EIS was sent to about 450 governmental agencies, individuals, special interest groups, and industry including those listed below. An asterisk indicates those who provided written response to the document.

I. Governmental Agencies and Individuals

- A. Governor Richard Bryan
- B. Nevada Congressional Delegation
- C. Federal Agencies

- Bureau of Indian Affairs
- BLM State Offices
- Bureau of Mines
- Bureau of Reclamation*
- Department of Commerce
- Department of Energy
- Department of Defense*
- District Managers, BLM Districts in Nevada, Idaho, and Utah
- Environmental Protection Agency*
- Fish and Wildlife Service*
- Geological Survey
- Humboldt National Forest
- National Park Service
- Soil Conservation Service

D. Local Government

- Community Services Division, Carson City
- Elko City Mayor
- Elko County Commissioners
- Elko County Manager
- Elko County Planning Commission
- Jackpot Advisory Council
- Wells City Mayor
- West Wendover Advisory Council

II. Special Interest Groups and Others

A. Conservation and Wildlife Groups

- American Fisheries Society
- Audubon Society
- Desert Fishes Council*
- Desert Research Institute

- Elko County Sportsmen Association
- Friends of the Earth
- National Wildlife Federation
- Natural Resources Defense Council*
- Nevada Dept. of Conservation & Natural Resources
- Nevada Dept. of Wildlife*
- Nevada Wildlife Federation
- Sierra Club*
- The Wildlife Society*
- Wilderness Society
- Wildlife Management Institute*

B. Cultural Resources

- Nevada Division of Historic Preservation and Archaeology*
- Nevada Archeological Society
- Te-Moak Bands of Western Shoshone

C. Grazing Interests

- Nevada Cattlemen's Assoc.*
- Nevada Woolgrower's Assoc.
- Wells RA Livestock Operators*

D. Land Management Interests

- Elko County Assoc. of Conservation Districts
- Federal Land Bank Assoc.
- Nevada Division of Forestry
- Nevada Farm Bureau Federation
- Public Lands Council
- Southern Pacific Land Co.

E. Mining Interests

- AMOCO Production Co.
- Anaconda Copper
- Atlantic Richfield*
- Chromalloy Corp.*
- Freeport Gold
- Nevada Mining Association
- Union Oil Co.

F. Recreation Groups

- Federation of Western Outdoor Clubs
- National Rifle Association
- Nevada Outdoor Recreation Association

G. Universities

- University of Nevada, Reno

H. Utilities

California Pacific Utilities
Sierra Pacific Power Co.*
Western Pacific Railroad

I. Wild Horse Groups

American Horse Protection Association
International Society for the Protection
of Mustangs & Burros
National Mustang Assoc.
WHOA Inc.

AVAILABILITY OF THE PROPOSED
PLAN AND FINAL ENVIRONMENTAL
IMPACT STATEMENT

This proposed resource management plan and final environmental impact statement was sent to those who received a draft document and all who commented on the draft. A Federal Register notice and an area-wide news release were also used to inform the public of the availability of this document. Copies are also available for review at the following BLM offices and public libraries:

BUREAU OF LAND MANAGEMENT OFFICES

Office of Public Affairs
Bureau of Land Management
18th and C Streets
Washington, D.C. 20240

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

Battle Mountain District Office
North 2nd and Scott Streets
P.O. Box 194
Battle Mountain, NV 89820

Carson City District Office
1050 East Williams Street
Carson City, NV 89701

Elko District Office
2002 Idaho Street
Elko, NV 89801

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

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

Winnemucca District Office
705 East 4th Street
Winnemucca, NV 89445

PUBLIC LIBRARIES

Elko County Library
720 Court Street
Elko, NV 89801

Nevada State Library
Attn: Documents
Library Building
Carson City, NV 89710

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

Government Publications Department
University of Nevada, Reno Library
Reno, NV 89557

Wells Branch Library
Wells, NV 89835

White Pine County Library
Campton Street
Ely, NV 89301

PUBLIC REVIEW AND
HEARINGS

Some 450 copies of the Draft RMP/EIS were mailed on May 20, 1983. Accompanying the draft was a letter noting the date, place, and time of the public hearings and the procedure for the public to submit comments. The final date for comments to be received in order to be incorporated into this document was August 19, 1983. A notice of the release of the Draft and pertinent information on comments and public hearing dates was published in the May 20, 1983 issue of the Federal Register.

A public hearing was held in Reno on June 20 attended by 24 members of the public, 11 of whom made oral statements. A second hearing was held in Wells on June 21. It was attended by 44 members of the public, 20 of whom made oral statements. The transcripts of these public hearings

are available for inspection at the BLM Elko District Office, 2002 Idaho Street, Elko; BLM Nevada State Office, 300 Booth Street, Reno; and BLM Office of Public Affairs, 18th and C Streets, Washington, D.C.

A total of 56 written comments were received during the public review period on the draft RMP/EIS.

All letters and testimony were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the draft environmental impact statement. Substantive comments which presented new data, questioned facts and/or analyses, or commented on issues bearing directly on the draft environmental impact statement or the environmental impacts of the alternatives were fully evaluated and given responses. Changes or additions to the draft environmental impact statement have been incorporated into this final statement.

RESPONSE TO PUBLIC COMMENTS

Table 4-1 (see next page) is an index of responses (by number) to comments received, organized by issue. All of the written comments (1-56 left column) have been reprinted in this FEIS beginning on page 4-23. In addition, excerpts from the public hearing record which required responses (57-73 left column) have also been reprinted beginning on page 4-109.

Table 4-2, beginning on page 4-6, displays the responses to public comment which are indexed in Table 4-1. When persons provided both written and oral comment, responses were developed for the written material only, unless issues not covered in the letter were raised during oral testimony.

	Bureau of Mines & Geology								40
	Department of Wildlife	2		82		2		41,3	2
	Division of Environmental Protection								
30.	Nevada Division of Historic Preservation & Archeology								
31.	Natural Resources Defense Council					35,36,42		43	43
						43			
32.	Glen E. Shewmaker					1	50	37,44,45,50	
33.	Marla Griswold & O. Steve Boies*								
34.	Dick Roth* (1st letter)					46,47			
35.	Dick Roth* (2nd letter)								
36.	Sierra Pacific Power Co.	2	2,48,87		48			2	
37.	Lands of Sierra, Inc.	49				2			
38.	Salmon River Cattlemen's Association							51	
39.	Sierra Club, Conservation Committee					35			52,53
40.	Sierra Club, Public Lands Committee*	2				18,36,42,54,81		41,55	55
41.	Nevada Cattlemen's Association				56	18,88		56	
42.	Jack G. Taylor								
43.	Kenneth L. Johns								
44.	Lloyd E. Shewmaker								
45.	Chromolloy								
46.	U.S. Environmental Protection Agency			57		42			11
47.	Demar H. Dahl*								
48.	U.S. Air Force								
49.	Dan H. Shewmaker*							51,8	45
50.	City of Wells								
51.	Pleasant Valley Grazing Association, Inc.								
52.	Dale R. Andrus Associates					18,42,58,		2	2
53.	Nevada Department of Agriculture	33	33		33	18,33,39,59	6,33	3	33 33
54.	Harry Melts (2nd letter)				64				
55.	Elliott Bernshaw								
56.	Vargas & Bartlett, Attorneys at Law				68				

ORAL

57.	Texas Gulf Minerals & Metals Co.				68				
58.	Sierra Club (Same as #40 above)								40
59.	Nevada Mining Association	60			68,69,72,73,74,75				60
60.	Dave Hornbeck				76				
61.	Les McKenzie				69,74,77	5,18		3,8	
62.	Von L. Sorensen (Same as #22 above)				69				
63.	Dick Roth (Same as #34 & 35 above)					5			
64.	Marta Agee				78,79,80			3,51	61
65.	Steven Boies (Same as #33 above)					7		3	
66.	Demar H. Dahl (Same as #47 above)					5			
67.	Dale Messner							3	
68.	Robert Watt			62		83,84,85		51	63
69.	Ray Bedke			4		1		3	
70.	Walter Winchell					5		51	
71.	Craig Spratling					5		3,8,51	
72.	Loyd Sorensen				69				
73.	Herbert Uhlig								9

* Indicates both written comment and oral testimony received from this person.

** This was the first of 96 identical form letters received from persons in the Wendover, Utah and West Wendover, Nevada area.

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
7 Cont.	<p>2. Permittees and lessees will maintain structural improvements constructed or installed primarily to benefit livestock grazing, and the requirement to maintain these improvements in current useable condition shall become a condition of a permit or lease. The maintenance of improvements not designed for the primary benefit of livestock grazing may be assumed by the Bureau, nonlivestock cooperators, or livestock operators.</p> <p>3. Where existing cooperative agreements cannot be renegotiated voluntarily, the primary beneficiary of an improvement shall be assigned maintenance responsibility by decision.</p> <p>4. Failure to maintain improvements to usable standards may result in the withholding of an annual authorization, cancellation of a cooperative agreement or range improvement permit, and/or eventual cancellation of the permit or lease.</p> <p>5. The owner of an improvement shall be responsible for reconstructing an improvement or repairing acts of vandalism.</p> <p>6. The costs of modifying an improvement shall be the responsibility of the party requesting the modification.</p>
8	<p>The Western States Fish and Game Commissioners recommendations for the management of sage grouse habitat has progressively developed over the past eighteen years. These recommendations have been periodically updated as new research indicated a change was necessary. The guidelines are simple, straight forward, and apply only in areas of sage grouse habitat. They suggest a close working relationship between the state wildlife and land management agencies. They recommend two years advanced notice of treatment be given to the state wildlife agency but allow for less. This is consistent with the Memorandum of Understanding between the Bureau and NDOW which requires a minimum of 12 months notification.</p> <p>Pertaining to sage grouse strutting and nesting habitat the guidelines recommend parameters within which no vegetative manipulation take place. The two mile radius (8000 acres), so often referred to, incorporates the majority of the strutting and nesting habitat. This would be a "worst case" in which the entire 8000 acres of habitat met the parameters in the guidelines. Such would very seldom be the case. For each proposed vegetative modification an on-the-ground investigation by Bureau and NDOW personnel will be performed to determine where the specific parameters exist. These portions of the 8000 acres would be recommended for exclusion from modification.</p> <p>Standard Operating Procedure #9, DEIS page 2-32, allows for the incorporation of new information concerning sound sage grouse management practices.</p>
9	<p>Page 6-1 of the DEIS describes public participation within the planning process. The public was invited by means of news releases, mailings, and <u>Federal Register</u> notices to participate during issue identification, scoping of the alternatives, and the 90-day comment period on the DEIS. To determine who the concerned members of the public are and contact all of them personally to gather information on multiple use of the land would be an extremely time consuming and expensive venture and as such it is not required within the planning process.</p>

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
10	Energy and minerals was not determined to be an issue because the program is handled under normal administrative procedures as governed by current laws, regulations, and policy. Specific mining proposals are handled through established environmental and administrative processes. It is impossible to assess the impacts from this program since it is not known where and when development will occur.
11	Page 6-1 of the DEIS describes the public participation activities of the issue identification process. Neither the public nor Bureau personnel raised water resources or air quality as issues of concern. It should be noted, however, that site specific analyses of the effects on these resources for individual projects will be prepared through established environmental and administrative procedures.
12	Cost per acre for vegetation manipulation projects for wildlife (5500 acres) is significantly higher than those for livestock because of several factors but primarily due to the methods used and the high cost of browse seed and seedlings.
13	See Chapter 2, Proposed Resource Management Plan, of this FEIS.
14	There is no documentation to show that wild horses were not on the Chase Springs and Tobar Allotments on December 15, 1971. All documented evidence (BIM Inventories February, 1975 and March 1978) indicates that there were horses on these allotments. Many of these were claimed trespass horses which were gathered during the claiming period of 1974 to 1978. All claims in this area were filled during this time and any horses left in the area are considered by law to be Wild Free Roaming Horses (letter of July 30, 1980 from the Wells Area Manager to Blair Johns in allotment files).
	Map 3-4 of the DEIS shows that lands in T. 33 N., R. 63 E. exist within the Spruce-Pequop Wild Horse Herd Use Area but that T. 33 N., R. 62 E. is outside the area. Wild horses have been observed on T. 33 N., R. 63 E. as well as other places in the Spruce-Pequop herd area.
15	As stated on page 2-2 of the DEIS all project proposals are for I category allotments but that some improvements will be done as the need arises on M and C category allotments. Improvements could include limited fencing or water developments but not extensive pasture fencing, large pipeline projects or seedings.
16	Although it is true that the Resource Protection Alternative would protect more springs than the Resource Production Alternative, this is insignificant when compared to the proposed seedings of the latter. The Resource Production Alternative proposes 232,000 acres of crested wheatgrass seedings at a cost of 5.5 million dollars while the Resource Protection Alternative proposes none.
17	As stated on page 2-18 of the DEIS the goal of the Resource Protection Alternative is "the preservation of natural values, with emphasis on management of fragile and unique resource values." Implementation of this alternative would cause substantial improvement of terrestrial wildlife and fishery habitats within the Wells RA. A secondary, not primary, benefit of these improvements is the significant increase in recreational use and economic good caused from increased hunting and fishing. Because these are secondary benefits they are appropriately addressed in the Resource Protection, not the Resource Production Alternative.

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
18	<p>Allotment categorization is a two step process which requires professional judgment on the part of the BLM for many of the criteria, along with personal experiences of livestock operators and CRMP Committee members.</p> <p>The first step was the development of the criteria. On March 5, 1982 the proposed criteria went to all livestock operators for their review. On May 26, 1982, Elko District personnel went to the Elko County CRMP Committee to request their input into the proposed criteria. At that time a subcommittee (comprised of representatives from the Nevada Cattlemen's Association, Society for Range Management, Northern Nevada Mining Association, Elko County Association of Conservation Districts, Western Shoshone Sacred Land Association, and Nevada Department of Wildlife) was formed. When the subcommittee made their recommendations, they included combining the criteria of range condition, trend, and potential into one since they are evaluated together. We incorporated all these recommendations and the final criteria were approved by the BLM Nevada State Director on December 21, 1982. Due to the fact that these criteria have received local review and approval by our State Office, they are not an issue at this point in time and have not been revised because of comments received.</p> <p>The second step is actual categorization of the allotments according to the approved criteria. Due to the timing of the RMP and the time consumed for public review of the proposed criteria and their final approval, there was not enough time for livestock operator input into the placement of the category prior to the DEIS. Therefore, it was decided to allow public comment on the categorization during the review period.</p> <p>In addition, it should be noted that allotment categories can be changed as the allotment situation changes or as new information becomes available. At such time the allotments will be evaluated with the livestock operator and the Elko County CRMP Committee as to its appropriate category.</p> <p>Table A2-1 of the DEIS shows the footnoting of specific information available which influenced the rating of a criteria. General professional judgment was not footnoted. As the table displays, there are seven criteria used to derive a category. There are no cases where all seven criteria resulted in seven Ms, Is, or Cs. Therefore, if the majority of the criteria were "M", then the allotment would be categorized as an "M". If allotments were categorized as "I" because any of the criteria were "I", then all of the allotments would be in the "I" category. The primary purpose of the Final Grazing Management Policy is to concentrate the Bureau's personnel and funding to the allotments with the greatest potential for returns. Therefore, if all of the allotments were in the "I" category, the purpose of that policy would have been defeated. In addition, the ability of a private individual to invest in projects is not a factor in allotment categorization. However, it does become a factor in prioritization of projects to be completed during a particular fiscal year.</p>
19	<p>The definition of "Net Ranch Income", as used in Table 3-2 of the DEIS, is provided in footnote 2 of the table.</p>
20	<p>The most recent data available on prices, at the time these ranch budgets were developed, was for the year 1980. Prices used reflect a 3-year average for 1978-80 as determined by the Economic Research Service, USDA. These price levels were discussed with Wells RA ranch operators at a workshop in Elko on November 12, 1981.</p>

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
21	These budgets are designed to represent the "average" or "typical" ranch operation and reflect the range of operating characteristics identified within the individual size classifications. Calving percentages and sale weights, etc., are based on data developed for the Federal Enterprise Data System by the Economic Research Service, USDA. The appropriateness of the values estimated for these parameters were discussed with Wells RA ranch operators at a ranch budget workshop held in Elko on November 12, 1981.
22	Production values per cow is an average value based on estimated sales of the typical ranch within each size group and the average herd size. It can be reasonably assumed that production values per cow reflect the relative style and efficiency of operating characteristics within each size group. The difference can be explained by the number and type of beef cattle brought to market relative to the average herd size of the typical ranch within each group. The number and type of cattle brought to market for each size group is based on USDA data as adjusted at the ranch budget workshop held in Elko on November 12, 1981.
23	The \$10.06 value is in error. The corrected value of \$0.65 was utilized in the final budgets and in the linear programming analysis. Revised final budgets are found in Table A-7 beginning on page A-20 of this FEIS. The ranch budget linear programming analysis, as discussed in the DEIS, was fully based on the revised final budgets.
24	The linear programming (LP) analysis of ranch operations and budgets by the Economic Research Service, USDA, is based on Total Digestible Nutrient (TDN) requirement of the herd for each month of the year. While hay may be fed for a 3-month period, the Economic Research Service analysis indicated that, on the average, hay provided only 21 percent of the total TDN requirement from feed, forage, and supplemental sources.
25	Revised final budgets, Table A-7 beginning on page A-20 of this FEIS, show that labor cost per cow data were moderately adjusted prior to the linear programming analysis. Labor cost information was developed by the Economic Research Service, USDA, and is based on data from the Federal Enterprise Data System, previous budgets developed in Elko County, and information directly supplied by ranch operators at the ranch budget workshop in Elko on November 12, 1981.
26	Table A5-2 of the DEIS describes the results from the linear programming analysis. The analysis is an optimizing technique which seeks the most efficient utilization of all factors of production. With the assumptions incorporated in the model, under the No Action Alternative the typical ranch in each size category would achieve its most efficient operation at a level somewhat lower than the characteristics described by the typical budgets for the existing situation.
	Table S-2 of the DEIS is in error. The \$650,000 figure under the heading "Change with No Action" should be deleted.
27	Native range condition would not improve as much under the Resource Production Alternative as the Midrange Alternative. There would not be more intensive livestock management by implementation of the former, but there would be more crested wheatgrass seedings and more cattle.

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
28	It is the intent of the Bureau, through cooperation and close coordination with livestock operators, that the design and implementation of any project be done in such a manner so as to eliminate or minimize impacts to other resource values.
29	Streams are especially valuable water sources for livestock and the Bureau recognizes their value to the livestock operator. However, the Bureau has the responsibility of, not only preserving streams for their value as water sources for livestock, but also providing wildlife and fisheries habitat, recreational opportunities and other uses associated with this resource. Streams and associated riparian communities are essential ecosystems. To maintain these communities and their multiple use resource values, systematic treatments, including definite periods of rest and grazing, are necessary.
30	While wild horse numbers would increase under the Resource Protection Alternative, livestock numbers would be decreased and total actual AUM usage would be less overall. Livestock AUMs would be decreased from the three to five year average use by 112,711 AUMs while wild horse use would only increase by 8,304 AUMs (692 horses x 12 months).
31	<p>The primary management action in the Resource Production Alternative would be to increase livestock grazing to preference by means of crested wheatgrass seedings. These seedings would be used to supplement early season forage. However, afterwards, the increased numbers of livestock would be turned out on native range. The combination of these increased numbers and the existing range habitat conditions would result in increased utilization of key browse species by livestock. As this component of the native range is already being severely impacted in most areas, big game (mule deer) habitat condition would be expected to either enter into, or continue in, a downward trend.</p> <p>Depending on the degree of livestock increase (some allotments would increase 50 percent over three to five year use levels in the Resource Production Alternative) stocking rates could have much more of an impact on big game habitat than season or frequency of use.</p>
32	A similar situation exists on Salmon Falls Creek through the Bad Lands WSA where livestock have little or no direct access to the stream but the habitat condition remains fair. Upstream watershed condition has a tremendous impact on these types of areas. Until some improvement is made to degraded streams and/or watersheds, upstream, these "pristine" areas will remain in less than optimal condition. However, it should be noted that nearly all streams in the Wells RA are like Salmon Falls Creek (their habitat can be improved) whereas that type mentioned in the comment (where their habitat is unimprovable) is rare.

TABLE 4-2 (Continued)

Response
Number

Response

33

The Sixth Alternative has components exactly the same, or similar to, those analyzed in the DEIS. The listing below shows by resource issue which alternative in the DEIS is like that proposed in the Sixth Alternative.

<u>Issue</u>	<u>DEIS Alternative</u>
Lands	Preferred
Corridors	No Action
Access	No Action
Recreation	None (See below)
Wilderness	No Action
Livestock Grazing	Preferred (See below)
Wild Horses	Production (See below)
Terrestrial Wildlife	None (See below)
Riparian/Stream Habitat	No Action (See below)
Woodland Products	Preferred

Recreation: Components in the Sixth Alternative which differ from those of the Preferred Alternative are: 1) Close additional areas to ORV use besides the Ruby Marsh Campground and 2) develop additional recreation areas as needs and opportunities arise.

As noted in response number 4, ORV use is causing very little damage within the Wells RA and further "closures" or "limitations" are not necessary.

Recreation use along Salmon Falls Creek and Mary's River indicate a current need for recreation facilities at these sites. To further postpone development would bring about added resource damage and visitor inconvenience at these areas.

Livestock Grazing: The Preferred Alternative incorporates all components of the Sixth Alternative except that the latter would adjust livestock grazing numbers according to results of at least five years of monitoring. We believe that three to five years of monitoring will provide sufficient data on which to make adjustments.

Wild Horses: The Sixth Alternative recommends maintaining wild horse numbers at the 1971 level of 320. First, as stated in response number 6, the number of wild horses in 1971 is unknown, but it would be significantly greater than 320. Second, the impacts of the Sixth Alternative would be similar to those of the Resource Production Alternative which would reduce wild horse numbers to 356.

Terrestrial Wildlife: Components in the Sixth Alternative which differ from those of the Preferred Alternative are: 1) modify hazardous fences only across major wildlife migration routes; 2) improve the condition of only crucial wildlife habitat shown to be in downward trend after monitoring; and 3) designate no ACEC.

The Sixth Alternative would modify fewer miles of fence than the Resource Production Alternative which would modify 475 miles within crucial big game habitat. It would also improve the condition of less crucial habitat than the Resource Production Alternative which would maintain the condition of all crucial habitat, not just that shown to be in a downward trend.

Without the ACEC designation of the Preferred Alternative the Bureau would be doing nothing to protect the historical habitat of peregrine falcon, a threatened and endangered species.

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
33 Cont.	<p><u>Riparian/Stream Habitat</u>: The outcome of implementing the riparian/stream habitat component of the Sixth Alternative would be the same as the No Action Alternative. By the time it is cooperatively decided which areas are high and medium priority habitat and methods of improvement agreed upon by all users of the allotment, nothing would be done for many more years. Meanwhile riparian/stream conditions will have continued to decline as outlined in the No Action Alternative. If this were to occur, the Bureau would most likely be in violation of the Threatened and Endangered Species Act of 1973, as amended, by allowing the continued degradation of habitat currently occupied by Lahontan cutthroat trout.</p>
34	<p>Wildlife associated recreation expenditures data were derived from the Nevada Department of Conservation and Natural Resources publication, "Economic Impact of Outdoor Recreation in Nevada," November, 1980. The <u>1980 National Survey of Fishing, Hunting, and Wildlife Associated Recreation, Nevada Supplement</u>, prepared by the U.S. Fish and Wildlife Service, was not available to us at the time this analysis was conducted.</p>
35	<p>To clear up any misunderstanding as to how the level of livestock grazing AUMs by alternative were derived, the following rationales are provided.</p> <p><u>Resource Production Alternative</u>: The increased grazing use under this alternative is based on bringing livestock use up to the preference grazing level by increasing forage production through seeding 232,000 acres of crested wheatgrass, prescribed burning on 10,500 acres and implementation of management systems.</p> <p><u>Midrange Alternative</u>: The livestock grazing use level is based on the 3 to 5 years average actual grazing use level and seeding 30,000 acres of crested wheatgrass to provide spring forage for livestock and deferment for native vegetation during the critical growth period.</p> <p><u>Resource Protection Alternative</u>: The reduction in livestock grazing use under this alternative was based on removal of livestock from areas of crucial wildlife habitat.</p> <p><u>Preferred Alternative and Proposed Resource Management Plan</u>: Increase grazing use to the preference level within the Ruby/Wood Hills and Metropolis RCAs and continue stocking at the 3 to 5 year grazing level for the remainder of the RCAs. The increase to preference in the Ruby/Wood Hills and Metropolis RCAs would be based on increased forage through seeding 6500 acres of crested wheatgrass and implementation of management systems. The Ruby/Wood Hills and Metropolis RCAs are composed primarily of small crested wheatgrass allotments with limited potential for development of other resource values.</p>
36	<p>A full evaluation of a No Grazing Alternative is not required for several reasons.</p> <ol style="list-style-type: none"> <li data-bbox="338 1669 1506 1795">1. The Taylor Grazing Act of June 28, 1934, recognized domestic livestock use on public lands and set up procedures to authorize and regulate that use. Therefore, alternatives should not seek to eliminate this recognized use but discuss alternatives that recognize and regulate livestock use. <li data-bbox="338 1827 1506 1885">2. Section 105 of the National Environmental Policy Act of 1969 states that "the policies and goals set forth in this Act are supplementary to those set forth in existing

TABLE 4-2 (Continued)

Response Number	Response
36 Cont.	<p>authorizations of Federal agencies." This suggests that since the Taylor Act authorizes, and regulates livestock grazing, we should not question the use itself (i.e., No Grazing), but only variations of that use.</p> <p>3. Council on Environmental Quality regulations on the implementation of NEPA, 1502.14(a), specify evaluation of all reasonable alternatives and a brief discussion of reasons for alternatives eliminated. Page 2-2 of the DEIS briefly discusses why the No Grazing Alternative was eliminated.</p>
37	<p>The statements on pages 2-11, 2-15, 2-20 and 2-24 of the DEIS are intended to reflect the condition of individual streams. For example, a stream that currently has a condition rating of 40 percent of optimum would be improved by 30 percent in the short-term. This would result in a 52 percent ($40 + (.3 \times 40) = 52$) of habitat optimum rating (includes both riparian and aquatic habitat) after seven years of treatment.</p> <p>It should be noted that the rate of recovery of a deteriorated <u>riparian system</u> is very rapid (based on numerous studies, see references in the DEIS) and that a 30 percent recovery in seven years is thought to be easily achievable on most streams. The rate of <u>aquatic habitat</u> recovery is somewhat slower. In many cases this type of recovery is accelerated by improvements in the adjoining riparian community. However, a 30 percent improvement in current conditions should be a reasonable objective for any stream within the Wells RA.</p>
38	<p>As stated on page 3-12 of the DEIS, the Bureau administers about 28 miles of stream habitat currently inhabited by Lahontan cutthroat trout within the Wells RA (43.5 percent of the total cutthroat habitat within the Elko District). This habitat is considered by the Bureau to be the highest priority fishery habitat in the resource area. This priority status is reflected in Chapter 2 under the various alternatives (pages 2-11, 2-15, 2-20 and 2-24, of the DEIS). This habitat is included in that habitat which would be improved within the short-term under the Resource Production Alternative. These same miles are included among those for improvement in the Midrange, Resource Protection, and Preferred Alternatives.</p>
39	<p>Recommendations on the implementation of the Experimental Stewardship Program will not be made until 1985 when the results of the studies have been completed. Since the program is still in the development stage it was not addressed in the DEIS.</p>
40	<p>Barite is mentioned on page 3-15 of the DEIS within the last paragraph of the Locatable Minerals section. The comment about gold not being mentioned is appropriate and Chapter 3 of this FEIS includes a statement about gold to be added to the paragraph.</p>
41	<p>In areas where restricting livestock grazing is necessary to maintain or improve crucial big game habitat, that method would be employed prior to costly vegetative manipulation. The 5500 acres of chain or burn, and seed recommended on page 2-24 of the DEIS will only occur as a part of detailed habitat management plans to be developed cooperatively with NDOW and CRMP. The 5500 acres have not been identified, but it is certain they will be dispersed throughout the Wells RA. This management action is included to allow the Bureau the opportunity to improve primarily mule deer winter range which could not be effectively improved by any other means.</p>

TABLE 4-2 (Continued)

Response
Number

Response

42

In response to comments received which requested additional clarification of range information, Table A-3 to A-6 have been prepared which show data by grazing allotment and are found beginning on page A-10 of this FEIS. It should be noted that information in the DEIS summarizes the cumulative effects anticipated after activity plans (prepared with consultation between the Bureau, livestock operators, and the Coordinated Resource Management and Planning Committee) are implemented. The above mentioned tables are provided as supportive data to the summaries in the DEIS.

A range of grazing treatments to be applied to allotments are listed on page 2-29 of the DEIS. Since the treatments to be applied to specific allotments are subject to the above mentioned consultation, we cannot say which treatment would be applied to a specific allotment. However, with few exceptions, on perennial native grass range, whether systems are intensive or custodial, the system will be designed with operator and CRMP input to meet the physiological requirements of the vegetation by not grazing any one area during the critical growth period (May and June) in two consecutive years. In addition, on salt desert shrub type vegetation, systems will be designed to defer grazing each year during the active growth period on areas where winterfat Oeratoides lanata is the key species.

Implementation of activity plans will require time and more detailed problem solving during the activity planning phase. Waiting until all specific plans are developed would mean several years delay in completion of the final Wells RMP. Environmental evaluation of proposed activity plans will be completed through normal administrative procedures as directed and in compliance with existing laws, regulations, and policy.

43

Site specific analysis of all land treatment activities, including herbicide spraying, will be through preparation of environmental assessments in compliance with existing laws, regulations, and policy. Only herbicides approved by the Environmental Protection Agency will be used and will be applied only in strict compliance with label restrictions by a licensed applicator.

44

Dr. William Platts, in his 1982 paper Livestock and Riparian - Fishery Interactions: What Are the Facts? showed the Hayes study not to be a properly conducted scientific experiment and refutes its conclusions as follows.

"Hayes (1978) studied a series of high elevation meadows and their associated streams in central Idaho. Ungrazed meadows were compared with meadows that were being grazed by cattle under a three-pasture, rest-rotation system. After only one field season of observation, Hayes reported that rest-rotation grazing by cattle did not significantly alter channel movement and that soil erosion on the ungrazed streambanks was significantly greater than the erosion on the grazed streambanks. Hayes did attribute some bank erosion to livestock during the vegetative growing season.

Hayes' conclusion that streambank erosion was greater on ungrazed watersheds than on grazed watersheds is biased because of improper study design. Hayes selected a study stream for the ungrazed meadow sites that naturally had less stable streambanks, greater stream power, four times greater channel gradient, higher stream velocities, larger channel substrate,

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
44 Cont.	and greater distance from the stream bottom to the top of the bank than the streams selected to represent grazed conditions. The grazed sites were also higher in elevation. The sites were in no way comparable and so the conclusions of the study cannot be accepted."
45	The inventory of aquatic and riparian resources within the Elko District was a joint effort by NDOW and BLM. The inventory conformed to procedures in the Nevada State Office Supplement (Release NSO 6-38, January 25, 1978) to BLM Manual 6671. Data collected included specific surface water measurements including discharge; measurements and categorization of stream bottom materials; stream bank measurements including cover, stability, gradient and percent ungulate damage; water quality sampling; macroinvertebrates sampling; and fish population data. This inventory as well as numerous on-going scientific studies throughout the Great Basin Region have shown that livestock grazing is the primary cause of stream/riparian habitat deterioration (see references in the DEIS).
46	The 1978-80 average sales price of cattle is based on data supplied by the Economic Research Service, USDA, and discussions with Wells RA ranch operators at the workshop in Elko on November 12, 1981.
47	<p>The feed and forage requirements for the linear programming analysis are based on Total Digestible Nutrients (TDN) in terms of Animal Units (AU). Cows are assumed to require 1 AU each or 2409 AUs of TDN for each of 3 winter months. Yearlings are assumed to require .45 AUs each or 399 AUs. Bulls are assumed to require 1.25 AUs each or 133 AUs. This makes a total feed and forage requirement of 2974 AUs for each of 3 winter months, or a total of 8922 AUs through the winter. The model incorporates an equivalency of 600 pounds of hay for 1 AU, therefore, 8922 AUs are estimated to require a total of 2676.6 tons of hay.</p> <p>The costs of production for meadow hay, as included in the budget line item, are variable costs only and do not include fixed costs or labor - both of which are included in other line items. Costs were calculated on a per-acre basis, at average yields, using 3-year average prices. Variable costs were estimated at \$27.62 per ton of meadow hay, or \$30.70 per cow for the preliminary budgets. These estimates were moderately adjusted in the revised final budgets, Table A-7 beginning on page A-20 of this FEIS.</p>
48	<p>The impact analyses in the RMP for wilderness was guided by the BLM <u>Wilderness Management Policy</u> and the <u>Wilderness Study Policy</u>. The <u>Wilderness Study Policy</u>, published February 3, 1982, allows for the consideration of outside sights and sounds during the wilderness study. As stated on page 18 of that document, "during the wilderness study, sights and sounds of human activities and works outside the boundaries of the wilderness study area may be taken into account in assessing the quality of an area's naturalness or its opportunities for solitude or primitive recreation. Any influence of outside sights and sounds upon naturalness or opportunities for solitude or primitive recreation within the WSA should be documented."</p>
	<p>Refer to Map 2-9 of the DEIS for corridor locations in the Midrange and Preferred Alternatives. The Midrange Alternative on Map 2-9 shows corridor segment Q-XX-PP penetrating the southeast portion of the Goshute Peak WSA while the Preferred Alternative displays corridor segment Q-GG-PP outside the boundary of the WSA.</p>

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
49	Bureau policy, as stated in Washington Instruction Memorandum No. 83-777 dated August 16, 1983, has changed and lands identified for disposal no longer must be offered for sale for two years prior to considering a land exchange.
50	Unlike domestic livestock, it is not the nature of wild horses to continuously graze riparian areas. As a result, the removal or elimination of a limited number of wild horses from the range will make little or no improvement in riparian resources (Feist, J.D. 1971 and Pelligrini, S.W. 1971).
51	<p>Because of the magnitude of fencing as a hazard to terrestrial wildlife in the Wells RA, building only future fences to wildlife specifications will not solve the problem. Depending upon the kind of livestock and wildlife which occupy a given area, fence specifications will differ somewhat. Mixing designs and standards to fit particular situations (fences near water, pasture fences, boundary fences) will be evaluated on a case by case basis.</p> <p>The Bureau is a multiple use agency as directed by FLPMA. The modification of existing fences to mitigate their adverse impacts to wildlife was recently supported by a landmark legal decision known as the Gist Decision. In this case (Gist Ranch, New Mexico, Interior Board of Land Appeals 6-78-1) it was documented that in New Mexico fences modified to meet wildlife needs did control livestock. In addition, research in Wyoming (Spillette et al 1967) has shown that properly designed fences constructed on public land can allow for antelope movement while still serving their original purpose of livestock control.</p> <p>Several hundred miles of fence with similar specifications have been built in a variety of situations and terrain in the Elko District within the last ten years. The lack of complaint from the livestock industry has led us to assume that these fences are serving the purpose of livestock control and that no major problems have been encountered. Fencing Manual 1737 guides the Bureau and states that fences should not be constructed in a manner degrading to wildlife habitat or impede the movements of wildlife. Also that all fencing should accomplish the desired objectives with the least restrictive and most cost effective type of fence.</p>
52	Bureau forest management guidelines recommend that maximum woodland harvest be at the sustained yield level. Sustained yield in the Wells RA is approximately 5250 cords per year. In practice there is no difference between the Midrange, Resource Protection, and Preferred Alternatives as far as cordage cut is concerned. Wood permits under any of them would be sold up to the sustained yield level of 5250 cords per year.
53	Both the general public and commercial Christmas tree cutters are allowed to cut trees on BLM administered lands, with the exception of the wilderness study areas where no live tree cutting is allowed. However, specific areas are outlined where commercial cutters bid competitively each year for the opportunity to cut Pinyon Pine and Juniper Christmas trees. It should be pointed out that both private and commercial Christmas tree harvesting is managed on a sustained yield basis, where only a certain number of trees are harvested each year.

TABLE 4-2 (Continued)

Response Number	Response
54	Table 2-1 of the DEIS has been updated and is presented as Table A-1 of this FEIS. Average three to five year licensed use in excess of grazing preference is temporary nonrenewable use.
55	The management action to reduce pinyon pine and juniper canopy cover by 75 percent on approximately 50,000 acres over 20 years is an attempt to improve mule deer winter habitat. Through the designation of selective greenwood harvest areas, private and/or commercial woodcutters would thin woodlands in areas where desirable understory vegetation exists that has the potential to re-establish or increase in quality and quantity to benefit deer winter habitat. These small areas, usually less than a few hundred acres, will be carefully selected by a wildlife biologist, coordinated and set up by the district forester, and reviewed by NDO and CRMP. We believe that this management option is the most cost effective when compared to chaining or burning.
56	As stated on page 4-8 of the DEIS "opportunities for hunting, fishing, and wildlife observation would continue to decline resource area wide as aquatic, riparian, and big game habitats continue to degrade" under the No Action Alternative. The decrease in visitor days derived from wildlife associated recreation (see Table A5-3 of the DEIS) was estimated to result in a decline in expenditures of \$184,700. Using the household multiplier of 0.296 (see Table A5-3 of the DEIS), the estimated loss in personal (household) income in the affected area was estimated at \$54,600. Figures were based on the estimated expenditure, rather than the amount by which expenditures declined, with results rounded off (see Table A5-4 of the DEIS).
57	A wild and scenic river study of Mary's River could take place in addition to implementation of the Mary's River Habitat Management Plan mentioned on page 4-2 of the DEIS. However, we believe that to do so would be a duplication of effort and would provide no more protection for the river than implementation of the management plan alone.
58	Estimates of the amount of range improvement work were made to meet the objectives of each alternative within the constraints of personnel and funding.
59	Bureau of Land Management Washington Office Instruction Memorandum No. 83-432 dated April 1, 1983 states that exchange-of-use is not required to receive credit for a percent federal range license on intermingled private lands within an allotment.
60	See Chapter 1 of this FEIS.
61	Maps 3-7 and 3-8 of the DEIS show both riparian and aquatic habitat of this section of stream to be in poor condition. These maps, at first glance, seem to be in conflict with the paragraph on page 3-5 of the DEIS which states, "the stream fishing available to the hiker or kayaker is considered the best in Elko County. Both rainbow and German brown trout inhabit these waters, due primarily to the excellent riparian habitat found along its banks. However, largely because of increasing sediment loads from upstream, the spawning gravels for these fish are being eliminated. Therefore, the quality of this fishery and its associated recreational value is being reduced over time."

TABLE 4-2 (Continued)

Response
Number

Response

- 61 Cont. It would also appear to be in conflict with the Wells Wilderness Technical Report which, on page 75, states "the untrampled streamside riparian and aquatic habitats are in fair condition and are considered unique ecological features. The fishery through the WSA offers about the best opportunities for stream fishing in Elko County."
- Actually the maps, if studied carefully, are not in conflict with either document and both statements are true. There is a statement on each map which reads "condition classes shown are overall riparian habitat averages. Isolated sections of riparian habitat may be in better or worse condition than average." This section of Salmon Falls Creek is an example of an area in somewhat better condition than the overall stream average. This area is well protected from livestock grazing because of steep rocky topography. Problems impacting this area are spring runoff (flooding) and heavy sediment deposition, both a result of less than optimal upstream watershed and riparian conditions.
- 62 The \$54,600 figure (page 4-15 of the DEIS) represents the decline in personal income in Elko County resulting from the long-term decline of \$184,700 in wildlife associated recreation expenditures under the No Action Alternative. This decline in expenditures is a result of fewer recreation visitor days expected because of decreased wildlife populations. The \$572,900 figure (page 4-26 of the DEIS) represents the estimated decline in wildlife associated expenditures under the Resource Production Alternative, which predicts an even more severe decline in wildlife species numbers and associated recreation visitor days. Under the Midrange or Preferred Alternative (pages 4-39 and 4-56 of the DEIS), expenditures are estimated to increase by \$589,000 due to increased wildlife numbers and associated recreation visitor days. This is estimated to contribute an additional \$174,400 in personal income to Elko County, an increase of 31 percent over the estimated present level of personal income of \$563,900 derived from wildlife associated recreation. See Tables A5-3 and A5-4 of the DEIS.
- 63 According to Dr. Robert J. Behnke (1979) of Colorado State University the coastal rainbow trout and the redband trout had common ancestors. Genetically they remain very closely related. In fact identification and separation of redband and rainbow trout is largely based on geographic locality. However, some of the more interesting differences in the two species are found in their ecology.
- The desert basin redband trout has a tolerance for high temperatures, high alkalinity and high pH. For example in Chino Creek within the Elko District (Elko Resource Area) redband trout survive in water which frequently has temperatures in excess of 83° F. This temperature extreme would have long since eliminated pure rainbow trout.
- Redband trout also appear to reach sexual maturity at an advanced age, have a long maximum live span, and have a more predacious tendency than rainbow trout.
- 64 The BLM Wilderness Management Policy (pages 14-30) identifies the specific guidelines which will be used in developing a wilderness management plan for each BLM-administered wilderness area. These detailed plans will include decisions to allow or disallow motor vehicle use and activities such as trapping operations. Additionally, the plans will specify the frequency, magnitude etc. of various activities occurring in wilderness areas.

TABLE 4-2 (Continued)

Response Number	Response
65	Elimination of Area "B" would only result in the deletion of ways W-24, W-25 and W-26, a total of about three miles, from the wilderness area. Ways W-19 through W-24 were deleted from the wilderness area (Area "C") in the Midrange and Preferred Alternatives. Additionally, there are no mining claims in Area "B" and anticipated conflicts with minerals were deleted in the Preferred Alternative; lands adjacent to the Ferguson Mining District were recommended nonsuitable.
66	The existing ways and fence in Area "D" are substantially unnoticeable and are not anticipated to present future manageability problems. The ways are infrequently traveled. The elimination of the area proposed would result in an odd configuration in the southwest portion of the wilderness area, which could result in future manageability problems.
67	Ways W-2 through W-9 are substantially unnoticeable, rarely traveled, rehabilitating naturally, and are not anticipated to present future manageability problems. The Wells RA contains numerous areas outside the boundaries of the Goshute Peak WSA which are suitable for recreational camping.
68	Geology, Energy and Minerals (G.E.M.) assessments (Mathews and Blackburn 1982 and Great Basin G.E.M. Joint Venture 1983) were prepared for all WSAs in the Wells RA and were fully considered in the wilderness suitability recommendations. Public comment on mineral potential in the WSAs was solicited and literature reviewed. All claims were examined along with general reconnaissance of the WSAs. Mineral potential of the WSAs was then classified based on known mineral occurrences. Minerals data was used to formulate the Preferred Alternative which reduced resource conflicts with minerals. Minerals information used in the DEIS was felt to be the best available at the time. The U.S. Geological Survey and U.S. Bureau of Mines will perform more detailed mineral potential evaluations of the WSAs prior to the Department of the Interior making a recommendation on suitable areas to the President.
69	The determinations of access routes being either roads or ways during the wilderness inventory process were based on the <u>Wilderness Inventory Handbook</u> , published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road." The Interior Board of Land Appeals (I.B.L.A.) has not reversed this decision. Additionally, the I.B.L.A. has ruled the use of cherrystem roads by the BIM is an acceptable practice in deliniating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.
70	Visitor day estimates by WSA were derived through use of the best available information including inventory, personal knowledge of the WSAs, and field surveillance.
71	Few individuals use the WSAs to manage livestock and prospect for minerals, as evidenced by the magnitude of these operations in the WSAs. Total yearly use for these activities in the WSAs is estimated to be less than 500 visits. The majority of livestock management in the WSAs is either accomplished through nonmotorized methods or takes place on the border roads and cherrystem roads which penetrate the WSAs. The 1750 visitor days shown on Table 3-11 of the DEIS does not include these 500 visits, only recreational use.

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
72	To date there has been little production of gold in the Wells RA. The major gold belt in Nevada is located west of the Wells RA in the western half of Elko County.
73	Mining claims were not used as the basis for determining mineral potential classification, but did serve to delineate first priority areas for a field evaluation.
74	The existing and future recreation use of the WSAs both with and without wilderness designation are shown on page 3-20 of the DEIS. The Proposed Resource Management Plan recommends 159,881 WSA acres for wilderness designation. Therefore, about 3.7 percent of the public lands in the Wells RA would no longer be usable for motorized recreation. This is an insignificant long-term impact according to the threshold on page 4-4 of the DEIS.
75	Page 4-25 of the DEIS states "...no significant adverse impacts to minerals would occur in the long-term." It does not state that "mineral development would not be adversely impacted because of wilderness designation."
76	The acreage differences between the Resource Protection and Preferred Alternatives is small, but the 7,357 acres recommended nonsuitable in the Preferred Alternative for the Bluebell WSA would result in improved manageability of the remaining area as wilderness by eliminating or reducing resource conflicts.
77	There is no difference between the visitor days displayed for wilderness on page 93 of the revised MSA dated January 1983 and those on page 3-20 of the DEIS.
78	All WSAs in the Wells RA were determined to have wilderness characteristics as documented in the <u>Wilderness Study Area Decisions</u> document published November 15, 1980. Guidance for conducting the wilderness inventory was contained in the <u>BLM Wilderness Inventory Handbook</u> . The purpose of the wilderness study is to analyze the impacts to other resources and users of designating or not designating the area as wilderness.
79	Some increased visitor use is expected in the Bad Lands WSA with wilderness designation. However, this increased use, which is expected to be about 2,000 visitor days by the year 2000, is not anticipated to result in conflicts with bighorn sheep inhabiting the area or its surrounding lands.
80	No conflicts are expected to arise between mule deer and bighorn sheep utilizing the same range.
81	Both the estimated range condition (Table A2-2 of the DEIS) and apparent trend (Table A-6 of this FEIS) are based on professional judgment, not on a vegetation inventory.
82	Table A5-3 has been revised (See Chapter 3, Revisions and Errata) to delete reservoir fishing use days as none of this use occurs on public lands. Fishing use is expected to increase over current levels in the Midrange (Preferred) and Resource Protection Alternatives due to improved habitat in high use fishing areas. Even with human population increases, fishing use is expected to decline below current use levels in the Resource Production and No Action Alternatives because of continued habitat quality decline in important recreational streams. For example, in the long-term under the Resource Production Alternative, 52 miles of stream would be improved. However, most of these miles would improve T&E species habitat which may not significantly improve sport fishing within the Wells RA.

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
83	Livestock industry employment and income does have multiplier effects through the county and the region. However, while the livestock industry is recognized as a very important stabilizing factor to the economy in the area, income and employment effects resulting from livestock actions under each of the alternatives were not determined to be significant in terms of the total economy of the county.
84	Three-year average prices for 1978-1980 were utilized in the analysis. This was the most current data available at the time and was considered to be a fair estimate over the next several years. It is recognized that three-year average prices may or may not be reasonable, depending on the state of the cattle cycle and the expected rate of inflation.
85	The \$25 and \$70 values refer to "return above cash costs," which represents total sales minus cash costs only. A better measure of earnings may be found in "Return to total investment" which is the return above cash costs minus family labor and depreciation. These values were modified in the revised final budgets, Table A-7, beginning on page A-20 of this FEIS.
86	See standard operating procedure number 32 in Chapter 3 of this FEIS.
87	The intent of the definition is accurate as written. A "Corridor" is intended to accommodate all future or existing utility <u>transmission</u> and transportation facilities where delineated. The exclusion of a major utility <u>transmission</u> or transportation route from corridor identification does not ignore its existence or conflict with the definition.
88	Gross income represents estimated sales revenue. It is based on herd sizes of ranch operations within each RCA multiplied by the estimated sales revenue per cow as displayed in the typical budgets (Table A-7 beginning on page A-20 of this FEIS). Net ranch income, for purposes of this analysis, is defined as the return above cash costs and family labor. Table A-7 of this FEIS displays costs considered for typical budgets of each ranch size classification.

Comment Letter 1

CELSIUS ENERGY COMPANY

P.O. BOX 11070 • SALT LAKE CITY, UTAH 84147 • PHONE (801) 530-2600

May 23, 1983

Mr. Rodney Harris
Elko District Manager
RMP/ETS Team Leader
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

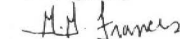
RE: Wells Resource Management Plan

Dear Mr. Harris:

I welcome the opportunity to respond on the "Wells Resource Management Plan." Celsius Energy Company is an oil and gas exploration firm with leases in the Spruce/Goshutes Resource Conflict Area. Celsius Energy strongly recommends that the Bureau of Land Management use the Resource Production Alternative for the classification of the Spruce/Goshutes Resource Conflict Area. Celsius believes that the Goshutes Valley area would be best utilized under the multiple use concept under this classification.

If you have any questions with regard to any comments, please feel free to contact me.

Best regards,



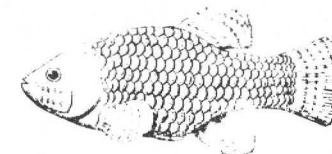
G. G. Francis
Western Division
Exploration Manager

GGF:jh

cc: Mr. Ruland Gill
Mr. Bob Pittam

Comment Letter 2

Desert Fishes Council



"Dedicated to the Preservation of American Desert Fishes"

407 West Line Street
Bishop, California 93514
May 26, 1983

Rodney Harris, District Manager
Bureau of Land Management
Elko District Office
P.O. Box 831
Elko, Nevada 89801

Re: 1792 (NV-010)

Dear Mr. Harris:

This refers to your recent communication relating to the draft Wells Resource Plan and Environmental Impact Statement Summary.

In the long term interest of the people of the United States, the Council urges you to adopt the Resource Protection Alternative, which would improve riparian/stream habitat conditions on the greatest area and length of stream mileage, while reducing livestock impacts. Although the Preferred Alternative is no doubt more acceptable to BLM under the current political climate, it nevertheless is biologically (and logically) inconsistent.

It seems illogical to make tacit admission of continuing habitat degradation (by reducing the area on which riparian/stream habitat might be improved), while allowing for a 2% increase in livestock grazing, which is the primary cause of riparian/stream habitat damage.

Again, we urge adoption of the Resource Protection Alternative.

Sincerely,

E. P. Pister
Executive Secretary

Comment Letter 3

2921 NE 53rd Street
Lighthouse Point, Florida 33064
May 28, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
2002 Idaho Street
Elko, Nevada 89801

Dear Mr. Harris:

Please include this letter in the comments on Draft Wells Resource Management Plan and Environmental Impact Statement. I support the resource protection alternative. This should include designation of 175,251 acres of wilderness in four units. It is important that this wilderness be saved for wildlife, scenic, recreational, and primitive values. I lived in Nevada for twenty years.

Sincerely,

Reed Beard
Reed Beard

Comment Letter 4

Rodney Harris
District Manager
(Po. 831) Wells Resource Area
Elko, NV. 89801

6-10-83

Re: Wells Wilderness Report

Dear Mr. Harris:

Thank you for the chance to review the copy of the Wilderness Technical Report and Draft Resource Plan. I am an Oregon attorney, ornithologist, backpacker, fisherman and conservationist, deeply concerned with the management of our federal lands.

In review of your "Preferred" Alternative, I find the following:

- (1) I question the need for intensive management of lands by cutting out all 700,000 acres of woodland. The Objective in Resource Protection Alternative.
- (2) The Riparian Habitat Plan should follow the Resource Protection Alt. for 52.4 miles of stream habitat improvement. I find this one of the most common, and worst problem on all BLM districts in the W. I feel because of the tremendous value of scarce riparian habitat to fisheries, watershed, wildlife habitat, and commodity uses it must have top priority.
- (3) I don't like the language under Terrestrial Wildlife Habitat, where only "essential and crucial" wildlife habitats will be protected.

Comment Letter 4

be adjustment of livestock usage. I realize full well that grazing has always received top priority on BLM range, but it should not, to the exclusive of AVMS and usage for all but crucial areas in need of. For example, if domestic sheep have to be relocated in Goswite or Pilot areas for protection of high mountain raptors, that should be done.

(4) I question the need for an increase in domestic grazing on any BLM district I have seen. Further the proposed plan to construct all the "improvements" including 80 miles (!) of pipeline seems suspicious on a cost/benefit basis. It would appear we tax payers will bite the bullet on that. I would appreciate more data on these proposed actions, especially as they may impact WSAs, ACEC, etc.

With regard to the recommended wilderness alternative, I generally support your position. The acreage in each area recommended is sufficiently justified by the data. My question is how such an enormous resource area could have only these 4 areas designated as WSAs?

Comment Letter 4

I am sorry I was not involved in the earlier stages of the WSA inventory on your district.

Of special importance to me are the protection of the areas & conditions in the Goswite & Bluebell WSA that protect the tremendous raptor migrations. When are the peaks of these migrations - October & March?

Thank you for the opportunity to comment on your documents. Please keep me advised on the progress of these plans, and what WSAs are recommended to $\frac{1}{2}$ by the State Director.

Sincerely,

Jeffrey Cook

27691 SE Haley Rd
Boring Or 97009

Comment Letter 5

Financial Impact of a July 1 BLM turn out date.

You recognize the importance of Livestock Grazing in the Wells resource area and also the significant long term adverse impacts to all ranch size owners.

Merley Nelson, who has done so much work with the birds of prey had stated that Rangeland is the most compatible use of the land with nature.

The Cattlemen still in business are hanging on, because costs and income will balance next year or before the banker call in the loans used to cover losses during this cost-price squeeze, which is one of the worst in the history of cattle ranching in this country.

Cattlemen own the Salmon River Cattlemen's Assn. by heavily day on fence and pasture ground until burnout. 2 to 3 extra months means the loss of crops on those fields or added corral facilities, or purchasing extra grazing.

On hay (with hay costs averaged at \$65.00 per ton for alfalfa) it costs \$54 per day (20 lbs. per day per cow) or \$10.80 for 30 days, and this does not include any protein supplement. Costs per day for 7,000 head would run \$4,500.00.

Your price for calves is \$28.67 per hundred lbs., while as of May 3, 1983, steer calves were bringing an average of \$67.00 per hundred lbs., thus reducing our returns by \$38.33 per hundred over your figures. Your figures also show a loss on all units under \$90 and the Salmon River Cattlemen's Assn. is made up almost entirely of units under \$90.

The increased costs of the program you are proposing would completely close off any light at the end of the tunnel for many cattlemen in this present financial struggle.

Tom Smith
Salmon River Cattlemen
242

6-21-83

4-26

1

Comment Letter 6

Mr. Rodney Harris
Elko District Manager Attn. RMP/EIS Team Leader 28.06.83.
Elko, NV 89801

Subject: Comments on the Draft Wells RA Draft RMP/EIS.

Personal Background: Even I spend summers in Canada, spring, winter and fall is often spent in Nevada, Arizona and Utah. I do not belong to any organizations advocating pro or against wilderness. I am a recreational wilderness user with main activities: day hiking and camping.

First a few general comments followed comments on specific WSA's.

I support the Preferred Alternative. Items I strongly support in it:

1. Acquiring of legal public access. In the past I have been unable to visit and enjoy many BLM areas due to lack of easements for access resulting many BLM lands becoming de facto private possessions not open to the public. Access becomes even more important, taking into considerations that majority of users are one-day users from their vehicles. Therefore legal public access and designated access corridors are important. I am pleased that the Preferred Alternative specifies the most miles for acquiring public legal access.

2. Springs are important to all users. Spring improvements should be done so that assure potable water for the camper and hiker barring animals from the well head's immediate vicinity to prevent contamination.

* * * * *
3. Grazing should be excluded in specific areas so that examples of ungrazed natural native vegetative areas can be viewed for quality wilderness experience. This is specially valid where wildflower displays occur. Support a decrease in AUM's.

Fire Management. Fire management of lightning caused fires should allow a minimum area to burn over in order to keep part of WSA's in natural state.

Scientific use of WSA's for research. Nevada has a sad record allowing public lands damaged by being lax in control of damaging single purpose activities by institutions and "academics". Permits are issued without safeguards to environmental damage. We have witnessed the issuance of permit to cut down the oldest known bristlecone tree (4900 years) in Ely District near Wheeler Peak. Frequently litter, traps, cut trees and branches are left after departure. People getting study ~~permits~~ permits should required to issue a bond to cover the cost of rehabilitation if it is required, more so in WSA's. Management policies are there, enforcement is not.

Comment Letter 6

Goshute Peak WSA

Support the Preferred Alternative, but with the following exceptions:

- 65 1. Eliminate Area B (map 2-4 RMP). It will eliminate from WA no fewer than seven existing Ways, (W19 to W25) and part of W26. It will eliminate the W24 which you intend for regular use by motorized vehicles by raptor study biologists even after WA is declared. For more details to my objections are outlined in my letter of 31.05.83. Your reply (your ref. 8500 (NV-017) dated June 16th 83 supplied additional information. I still object a regularly occurring motorized use in a wilderness area, my objection is based on that the motorized use in this case is avoidable, non-essential to management of this specific wilderness if designated as such. Even your WMP states that "Research and other studies will be conducted without use of motorized equipment or construction of temporary structures" True, the State Director can make exceptions to this policy in projects that are essential to management of the specific wilderness where no other feasible alternatives exist. Trapping of raptors is not essential to management of this WA. Trapping of raptors is not in the same category as trapping of wild horses. Wild horses are an introduced species, excessive numbers will ~~mark~~ cause ecological damage. Further WMP states "...where no other feasible alternatives exist". Your own WTR on page 43 states "Vehicular access should be allowed up Christmas Tree Canyon to the terminal end of W24. This would enable persons to haul necessary equipment for trapping operations to the base of the mountain before having to carry it on foot to the top". If it is feasible to carry this equipment on foot a longer distance on foot trail up a steep mountain side then it must be also feasible to carry this equipment a shorter distance through section 36 on a way (W24). Obviously raptor trapping does not qualify for exception for motorized vehicle use, once WA is declared.
- 64 Elimination of Area "B" eliminates part of the problem. If trapping is unavoidable due to pressure from biologists then the trap area (section 35 should also be eliminated from the proposed WA. I disagree with your statement on page 43 that the above trapping activities are not expected to impair the wilderness character of the area. A birdwatcher and/or wilderness visitor sure will object to the howling of engines and trapping of birds. All this will undermine the integrity of Wilderness Area principles. Elimination of area B will also eliminate some opposition from mining claim owners and objections based that "B" is a good mineral potential area.
- 66 2. Eliminate a small part of area D by having boundary line follow W17 to its terminal, follow section line to W16 then along W16 until it joins the proposed boundary. This will also eliminate a fence line within it. Since the new boundary will follow mostly the two ways it should not pose management difficulties.

4-27

Comment Letter 6

- 67 3. Classify as non-suitable area F. Elimination of this narrow strip will exclude from the proposed WA no less than eight ways (W2 to W9). These short ways then will be ideal for recreational camper to leave a road with its traffic and dust and greatly increase the quality of his camping experience.

BLUEBELL WSA

I support the Preferred Alternative and agree with your observation that the Morgan Rd should be left open for motorized travel.

In conclusion, I found the WTR and RMP drafts well prepared and very informative. These documents provide ideas where to go in the future and no doubt will increase the recreational visits to Wells RA. Recreational use is a function of information available. I hope considerations will be given where the future trailheads, campsites and parking areas will be before the final wilderness boundaries are established.

Sincerely,
Harry Melts
Harry Melts
Box 568
Creston, BC V0B 1G0
Canada

Comment Letter 7

July 10, 1983

Mr. Rodney Harris
Elko District Manager
Attn: RMP/EIS Team Leader
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

I have recently reviewed the environmental impact statement dealing with the BLM lands in Elko County.

2 In reviewing this document, an area of concern has surfaced. In section 3 page 17 (3-17) the population chart shows Wendover to have a population of 395 in 1980; 370-1100 in 1985 and 450-1400 in 1995. The current population in West Wendover already exceeds the 1995 forecast. It is impossible to do any quality planning with information that is this inaccurate.

There is a desperate need for affordable housing in West Wendover. Currently all the private land is under the control of one company and it is uncertain when they will put any land on the market for individuals to purchase. There is a concern that the land they sell will be very expensive.

It would be beneficial for West Wendover to have BLM land released for private residential development. There isn't a need for commercial property at this time.

I understand that the company which owns all the land is opposed to any BLM land being released but that this is not the feeling of a large majority of the people in West Wendover.

MIL HARRIS-

I AGREE WITH HIS LETTER AND WOULD APPRECIATE YOUR OPINIONS.

BRENT JONES
Box 2422
WENDOVER, NEVADA 89403

4-28

Comment Letter 8

Statement of Bob Wright on Wells Draft Resource Management Plan and Environmental Impact Statement.

After reviewing the Draft Plan and Statement I wish to make some comments in regard to it. One of the purposes of the development of the plan was to identify the habitat condition of the lands managed by the Bureau. Actual field forage inventories were made in the Wells Resource area. yet in reviewing the habitat condition for wildlife, about one-fourth of the mule deer and two thirds of the antelope ranges are listed as in unknown condition. To the Natural Resource Defense Council, who was responsible for the E.I.S.'s, this is only telling them that the Bureau hasn't done their homework and invites court action. They have already initiated court action on two E.I.S.'s in Nevada. Surely the Bureau people know range conditions sufficiently to rate them in something other than unknown.

It seems rather odd that the antelope range did not rate in good or fair condition, only poor or unknown. That, to me, seems irresponsibly done as antelope and livestock basically have the same grazing habits and three fourths of the livestock ranges were rated as being excellent, good or fair condition. Some of the finest specimens of antelope are being taken in the Wells Resource Area which speaks well for the forage available.

3 The request of the Nevada Department of Wildlife that deer herds be doubled in numbers and antelope herds be increased by 400% is unrealistic. Both private lands and public lands within the resource area could not handle that many. Wildlife numbers have increased dramatically over the last forty to fifty years while livestock numbers have decreased. If ~~the~~ wildlife numbers are allowed to increase at that rate then livestock numbers should also be increased.

Bob Wright

Comment Letter 8

3) Bob Wright

The modification of fences to accommodate wildlife would be an expensive undertaking and not cost effective. In areas where wildlife frequently graze, such as meadows and irrigated pastures, seldom does one get hung up in a fence. If the 650 miles of fence is modified the wildlife department should make arrangements to stand the cost of the project.

4 I did not ^{find} much reference in the plan to the damage being done by four wheel drive vehicles used by hunters and recreationists. In some areas just about every ridge is getting a road started and with the increased moisture the past year erosion is taking place on these roads. In fact one road I have seen this spring has washed to a depth of ten to twelve feet. This should be addressed in the plan.

5 In regard to livestock grazing in the Well Resource area I find very little mention of the suspended non-use A.U.M.s and their relationship to the active use. All comparisons in the management actions are made on a 3 to 5 year use. The preferred alternative shows a 2% increase in A.U.M.s when actually it is a 23 1/2% decrease when compared to the active preference. The only alternative that shows any increase in livestock grazing is the Resource Production one, that being about 2%.

The improvements proposed in the preferred alternative for livestock grazing is not adequate. Only 27,000 acres are identified as reseeded whereas the Resource Production alternative identifies 232,000 acres. More water wells should be drilled and springs developed along with pipelines to obtain better distribution of livestock and wildlife use. Much research has been done on prairie burning and spraying. Only 28,500 acres are being proposed. Economics will be such that burning will have to be used more. Seeding within the burns and sprayings should be considered using

Comment Letter 8

Native species as well as the wheat grasses. Seeding would also help reduce the increase of rabbit brush in the treated areas.

I find nothing in the plan that shows the economic contribution of the wild horse herds to the resource area. If no-one is viewing the horses and no economic or emotional good is being provided then the roughly 600 head herd is hard to justify. The forage they consume would be better allocated to wildlife or livestock.

The three wilderness areas being proposed in the Spruce-Goshutes seem to be more than adequate for that type of wilderness. Our wilderness area could just as well suffice and adequately provide for that demand.

After the tour last year of the riparian-stream habitat in the O'Neil and Mary's River area and the sentiment expressed by the persons present I find it difficult to believe that the Bureau is proposing the actions they are. More research needs to be done before such an ambitious program is undertaken. It is my understanding that some fencing of riparian zones has not been beneficial and have been removed. To construct 95 miles of fence along stream banks in a deep snow country doesn't seem very worthwhile.

After reviewing the various alternatives proposed the one that I feel the most acceptable is the no action one. It is a continuation of the present practices and uses, making decisions on a case by case basis. It is tried and tested. When one views the waving grass, the blossoming shrubs and the excellent condition of wildlife and livestock in the Well Resource area then some degree of successful land management has been attained. The alternative being developed by the grazing board would have to be evaluated when it is finalized but it would surely be more acceptable than any of the alternatives proposed in the plan.

Comment Letter 9

ROBERT E. WRIGHT, JR.

702-752-3458 • CLOVER VALLEY
WELLS, NEVADA 89835

June 21, 1983

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

Dear Mr. Spang;

I have reviewed the Draft Resource Management Plan, and Environmental Impact Statement, Wells Area, and would like to offer comments for the consideration of the Bureau and for inclusion in the "Public Comments" section of the Final Environmental Statement.

This submission includes comments on the proposed action, suggestions for improvement of the Final E.S. and recommendations for modification of the proposed plans.

In reading through this Draft it reminds me of college days. The class members had to buy books on how to rope. The class studied these books for 1/2 of the college year. Each book had alternatives. If you were left handed you do it one way, hold the rope 6 inches from the hondo, swing it above your head or along your side. Well, after 4 months of study we were all experts, until the actual use of roping was put into action. With this example I will base my submissions.

I have been engaged in the use of Public Lands all my life. At least once a week for the last 20 years I have travelled these public lands during the accessible and climatic times of the year. I have watched and maintained Wild Horse Bunches, Wildlife Species, Land Actions, Woodland Products, Water Projects and Livestock Use. Now, after 20 years of study and experience, and reading this draft it makes one wonder how any of the issues the Bureau identifies and addresses ever existed before now. But they did.

Of the Livestock grazing issue, the change from 3-5 year use, there are more active use A.U.M.s in the Wells area then you have outlined. The Bureau has 289,934, when actually there are 379,279

5

Comment Letter 9

(2)

A.U.M.s.

The Bureau in there 5 Alternatives suggests no change in 2. A decrease of 39% in 1 alternative, and an increase of 2% and 33% in 2 alternatives. After reading further into the draft the actual increase is not 33% but 1.2%. The numbers used in the Draft do not relate to each other and are incorrect. The Bureau states and I Quote, "Livestock grazing use will continue to be licensed at present levels. Monitoring studies will be conducted on allotments until sufficient data has been obtained." End of quote. It seems to me that this draft was put together with more emphazises on school book data and little or incorrect information on actual use or trend.

6

I believe the horse numbers should be brought back to the 1971 numbers. And that is 320 horses. In which there was no mention of this figure in the Draft.

I would also like to comment on the protected numbers of springs. During the Planning process of the Draft, Livestock users were asked to send into the Bureau the area and numbers of springs on the livestock users allotment. Published in the draft are the numbers of springs as "Unkown". Water is a very, very important source of the multiple use concept. It is a management tool. In some allotments water is not considered as a beneficial use to the allotment, because the Bureau has never committed funds or improvements to water developments.

It is mentioned in the draft that water is to be made available in allotments for wildlife, wild horses, and recreation. There is no figures given on how much water do wildlife, wild horses, and recreation need. How much water does a mule deer need, does a crow need etc..

7

It is mentioned that spring developments, riparian stream habitat, wildlife escape devices, water troughs, etc. will be implemented. But no mention of who will provide and maintain these projects. There also is no recognition given of any spring developments done by any other land users of the Bureau.

8

I would like to comment on the procedures the Bureau will go in accordance with as specified in the Western States Sage Grouse Guidelines. Any alteration of sagebrush areas, or any crested wheatgrass seedings will not be located in crucial big game habitats or sage grouse areas. Studies have just been completed on the Saval Ranch north of Elko, in which the numbers of sage grouse increased

4-30

Comment Letter 9

(3)

8 | because the sagebrush was removed and crested wheatgrass was planted.

In the Draft it is stated that fence construction must comply with the B.L.M. manual. The state fence laws are much more reasonable and less cost effective. It is mentioned that lay-down fences will be constructed, gates positioned every mile, barb-less wire used, springs fenced and over 600 miles of fence reconstructed to meet these guide lines. But no mention given of who has to reconstruct, build, and maintain it.

No studies were mentioned of public access over railroad tracks. In the Wells area railroad tracks are existant. What does the presence of these tracks do to the access of public lands and do they create management problems to the users.

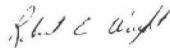
9 | I was told that during the planning stages of the draft, that land users mainly livestock owners would be contacted to gather information on the multiple use land they use. This was not done.

In looking at the draft references of over 120, I reconize about 1 hand full. Of: the references given, 1 allotment in which a study has been conducted by the University of Nevada for over 10 years was not mentioned. This study was fenced so no livestock could get in. Results of this study are showing that the fenced area is in a declining trend.

It is surprising that the Bureau would develop such a document that if implemented, would have adverse impacts on the livestock user and surrounding economic value of a county.

If the livestock user can supply data and information in an effort to accommodate a valid E.I.S., then certainly we are willing to extend that cooperation and input.

Sincerely yours,



Robert E. Wright

Comment Letter 10

Atlantic Richfield Company 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

July 26, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Re: Draft Wells Resource Area
Resource Management Plan

Dear Mr. Harris:

Atlantic Richfield Company appreciates having this opportunity to provide comments to the Bureau of Land Management (BLM) on the Draft Resource Management Plan (RMP) for the Wells Resource Area, Nevada.

Atlantic Richfield strongly supports a balanced approach to the multiple use of our nation's public lands, and believes that the BLM should fully consider energy and mineral resources in its planning procedures. As an initial phase in planning for the Wells Resource Area, the BLM identified a list of ten issues of concerns, including such items as recreation, wilderness, livestock and wildlife. However, energy and minerals was not listed as a planning issue, and we question whether this important class of resources has received consideration as a full and equal use of our public lands.

10 | As you may be aware, Atlantic Richfield holds substantial property interest in a portion of the Wells Resource Area known as the Elko Fairway, which in our estimation harbors high potential for the development of oil and gas. Our evaluation of the Preferred Alternative's recommendations for this tract did not reveal any proposed restrictions or special area designations that would hinder development of this area's resources. Because of its development potential, we believe that restrictive stipulations should not be adopted for the Elko Fairway.

68 | We strongly recommend that the BLM fully consider the information now available in the Geology-Energy-Minerals (G-E-M) reports which have been completed for many BLM wilderness study areas in Nevada. These



Comment Letter 10

Comment Letter 10

Mr. Rodney Harris
July 26, 1983
Page 2

68

reports contain useful information on the development potential of specific areas. With respect to particular wilderness proposals in the Wells Resource Area, we agree with the G-E-M report's recommendation for the South Pequop area that detailed mapping of phosphate occurrences be completed to determine how significant these occurrences are, and that geochemical sampling be undertaken to check for the presence of metallic mineral occurrences. The G-E-M report for the Bluebell/Goshute Peak areas contains a great deal of information on their mineralization that should be considered in planning. We concur in the report's conclusion that reconnaissance and geochemical sampling be used to determine if there are unknown mineralized or altered areas within this tract. These activities will help broaden the resource information base that is essential to informed, rational land use decisions. We encourage the BLM to re-evaluate its preliminary recommendations for wilderness suitability using the additional information now available in the G-E-M reports. Because of these areas' mineral potential, we believe the wilderness acreage as contained in the Resource Production Alternative is preferable to that recommended in the Preferred Alternative.

We are also concerned over the proposed application of time of year restrictions on leasable and/or saleable minerals to protect crucial deer winter range and sage grouse strutting habitat. For example, if there is a mining operation within an area subject to a seasonal stipulation, would the mine have to temporarily cease operations? Such closure would certainly have a severe economic impact on operations at the site.

In summary, we encourage the BLM to more fully consider energy and mineral resources in the plan for the Wells Resource Area, and to incorporate information contained in the recently completed G-E-M studies. Such consideration will help the BLM fulfill its multiple use mandates for public land management.

Mr. Rodney Harris
July 26, 1983
Page 3

Thank you for this opportunity to provide these comments. Please contact this office if we can be of further assistance in your planning effort.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

JRM:JFO:drm



United States Department of the Interior
WATER AND POWER RESOURCES SERVICE
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COLLEGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY
REFER TO: MP-150

JUL 28 1983

To: District Manager, Elko District, Bureau of Land Management, Elko, NV, Attention: RMP, EIS Team Leader
From: Acting Regional Director, Sacramento, CA
Subject: Review of Draft Wells Resource Management Plan and Environmental Impact Statement

We have reviewed the draft statement (DEIS). Our comments are as follows:

General

Chapter 1, Planning Issues and Criteria, should include a discussion of surface and ground-water availability and management. The issue of water availability is critical to an arid area such as that covered by the DEIS.

11 Impacts to surface and ground-water availability resulting from the proposed action should be mitigated. Current water users must be assured that the quantity and quality of their water will be protected.

Specific

1. Summary, Alternatives, page S-1 - The introductory paragraph states "each [alternative] emphasizes a different balance between conflicting resources." In view of the alternatives presented, the paragraph should state instead, "each [alternative] emphasizes a different resource."

2. Preferred Alternative, Issue 6, #2, page 2-23 - The development of water resources in the Wells Resource Area is discussed. The location of the water projects mentioned, the quantity of the water involved, and the water development and management agency should be included in the discussion.

3. Locatable Minerals, page 3-15 - The introduction to the list of minerals is not clear. The list apparently identifies "critical and/or strategic minerals," some designated as occurring in "identified or potential reserves." Barite, mentioned in the text as the most important mineral mined in the area, is absent from the list.

4. Environmental Consequences, page 4-2 - As mentioned previously, a specific amount of water development is proposed for the Preferred Alternative discussed in chapter two. However, in the discussion of the environmental consequences of this water development, the first paragraph on page 4-2 implies environmental impacts have yet to be determined. If this implication is valid, such environmental impacts will have to be identified and analyzed.

Under the discussion of an irreversible commitment of resources for the Preferred Alternative, #7, page 4-62, evaporation from newly created impoundments should be mentioned. The amount of water lost to evaporation and the effects of this loss on downstream water users, should also be discussed.

2 | 5. Interagency Contacts, I.C., page 6-2 - The reference to the Water and Power Resources Service should be changed to the Bureau of Reclamation.

Thank you for the opportunity to comment on this document.

4-33

I would like to buy a minimum of one acre to put my
 own horse trailer on. I would like another acre for my
 son's family - likewise my daughter. I cannot find
 any more land on the Utah side or the Nevada side of
 the border. I have been waiting 24 years for land
 on the Nevada side. How much longer must I
 wait? Do I have to be a millionaire to buy a parcel
 in order to get a spot for myself? All that land
 sits there - unused, useless - sagebrush and
 dirt. So many, many people in Henderson would
 give their eyes teeth for a plot of ground to cast their
 own shadow. How does it all come so much land in our
 name? It produces nothing. Let the people
 to rent + let Nevada collect the taxes ^{who speaks}
 who is the little guy? The one who pays the highest
 percentage of taxes in the country? Does money
 talk? You bet it does! The rich get richer. Average
 Joe flows along the same or goes backward -
 seldom forward. I just don't have \$20,000 for 1/4 acre
 or 1/2 acre that Nevada Crossing is asking for their
 land. In fact they aren't selling any yet. Will they
 ever? Our employees at the Hillbilly casino
 have difficulty finding living quarters here in
 Henderson. The large casinos have housing for their
 employees only. When they quit they have to move +
 find housing elsewhere. Most times they can't so they
 leave Henderson. The Ely wells all got land
 to expand. Why not Henderson? Who decides who gets
 the land? The corporation without the money? Are

we big checks for big amounts of money then we don't
 stand a chance of profit by it? At whose expense? Do
 our votes count? Do we have anything to say
 about it? Why don't you come out to Henderson and
 talk to the people who live and work here. Why don't
 you hear our side of it? Who represents ~~us~~ ^{us}?
 Mary Ann Dotson



Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1806

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

August 2, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
Post Office Box 831
Elko, Nevada 89801

Dear Mr. Harris:

The Wildlife Management Institute is pleased to comment on DRAFT WELLS RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT, Nevada.

The plan has so little detail that we cannot determine how the "benefits" will be derived, if the plan is the best way to achieve benefits, or if in fact the wildlife benefits will be achieved. For example, massive range improvements will increase livestock AUM by 4,912 (1.7 percent) over the three to five year average licensed use at a cost of \$2,381,500 (Page 2-23). This calculates to a cost of almost \$485 per AUM or a subsidy of \$29,401 for each of the 81 livestock operators in the Wells area.

The interest, at 8 percent, on the cost of each new AUM comes to \$38.80 a year. The United States charges \$1.40 a year for use of that AUM. It is interesting to read that this report (Page A5-9) uses \$7.88 as the lease value of an AUM to compute value of forage consumed by wild horses on BLM lands.

Either the costs of livestock grazing improvements (\$2,381,500) are too low, or the costs of wildlife habitat improvements are too high (\$1,509,000) (Table 2-7). A comparison of work listed does not seem to agree with the amount of cost.

Livestock Improvements		Wildlife Improvements	
Seed	35,500 acres	Chain or Burn	5,500 acres
Burn	27,000 acres		
Spray	1,500 acres		
Fence	265 miles	Modify Fence	650 miles
Wells	65		
Reservoirs	5		
Springs	30	Protect and	
Pipeline	80 miles	Enhance Springs	250
Cost	\$2,381,500		\$1,509,000

DEDICATED TO WILDLIFE SINCE 1917

Mr. Rodney Harris

-2-

August 2, 1983

Riparian habitat is to be improved. We could find no details on how this will be accomplished. No fencing is listed, no grazing systems are listed, and only \$585,000 is to be spent.

The monitoring started in 1981 (Page 2-30). This is good. No mention is made of wildlife monitoring, or the part that the Nevada Department of Wildlife will have. Since the Wells Resource area has 30 percent of Nevada's mule deer (Page 3-39), the state should have an overriding interest in monitoring which will set the standards for grazing increases. Since monitoring and negotiation with operators will be the basis for adjustments, we consider state wildlife participation essential to sound wildlife management (Page 4-3).

The "reasonable numbers" wildlife goal (Table A3-1) is good. These figures should include AUM's of forage reserved for wildlife and should be moved to the main body of the statement, not buried in the appendix.

Since there is little detail on management of either livestock or wildlife and the costs are very high for both, we find the plan unacceptable. Nearly all the wildlife benefits could be achieved by stream fencing and livestock reductions.

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

Sincerely,

Daniel A. Poole
President

DAP:bb

4-35

12

13

Comment Letter 14

Comment Letter 14

Blair A. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835
August 14, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

I have studied with great interest your Draft of the Wells Resource Management Plan and Environmental Impact Statement.

I attended your June 21, 1983 public hearing.

I feel that the draft as proposed makes too much of an issue about conflict of interests and not enough said about cooperation between the users of Federal land.

Under your Preferred Alternative Plan:

Issue 6: Livestock Grazing.

5

You propose a cut of 23% of grazing A.U.M.'s below preference. You propose to cut my A.U.M. preference on my Chase Springs and Tobar allotments by 63.9%. That proposal is just not fair.

I am a relatively new permittee having purchased the Chase Spring allotment in 1970 and the Tobar allotment in 1971. I have not had enough cattle to use all of my A.U.M.'s each year. So now by taking the three-year average of the A.U.M.'s used you want to penalize me by canceling 63.9% of my preference A.U.M.'s.

You will notice in my files at your office many letters requesting cooperative participation in new range seeding, fencing and water development. The A.U.M. reduction you have proposed for my allotments will be a severe economic blow to me. It severely undermines one's desire to really protect, conserve and improve the Federal range. It will wreck my ranching plans for the future.

Issue 7: Wild Horses.

14

There were no wild horses on my Tobar and Chase Springs allotments at the time of the passage of the Law on Dec. 15, 1971. Oscar Anderson, my B.L.M. area supervisor said that "No wild horses were on those allotments. You will notice that you have letters in my files in your office concerning horses.

Mr. Rodney Harris - Page 2

The B.L.M. is obligated by law to remove any wild horses from my allotments if they are requested to do so.

Issue #: Wild Life.

You have placed too much emphasis on increasing wild life and decreasing livestock grazing. It would be better to emphasize cooperation and an equal increase or decrease of numbers. Don't forget the great part that the private landowners play in providing water and feed for wild life. I personally provide for wild life on my private land but I surely will not feel good about it if you increase wild life 300 to 400% and then at the same time cut my livestock B.L.M. Grazing Preference 63.9%.

Summary: For Chase Springs and Tobar Allotments.

1. We should increase production as per my requests over the last 12 years for cooperative reseeding, water development and fencing. There is enough land suitable for reseeding to produce feed for 10,000 A.U.M.'s plus wild life feed.

2. Your proposed 63.9% reduction in my grazing preference would place a very severe economic strain on my long-range plans for my ranching business. Private hay land has just been acquired to winter enough cattle to fill all of my B.L.M. A.U.M. grazing preference.

3. Your Wild Horse Map #3-4, Spruce-Pequeop Herd use Area shows approximately the following land in my Chase Springs Allotment:

T. 33 N., R. 62 E.; Section 13, all. Section 14, SE $\frac{1}{4}$; Section 24, all; Section 23, E $\frac{1}{4}$; Section 25, NE $\frac{1}{4}$.

14

T. 33 N., R. 63 E., Section 18, all; Section 17, SW $\frac{1}{4}$; Section 19, all; Section 20, SW $\frac{1}{4}$; Section 30, NW $\frac{1}{4}$; Section 29, N $\frac{1}{2}$.

Some of the above land is my private land. All of the water in the area is on my private land. There are not now and never has been any wild horses in that area. Much of it is steep and rough and too far to water.

4. I agree with the Sixth alternative. Wells Resource Area Management Plan as developed by the grazing board. Will you please use it as suggested to bring together in a cooperative atmosphere all of those factions which use the Federal land.

Sincerely yours,

Blair A. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835

4-36

Comment Letter 15

Comment Letter 16

Nevada Grazing Board of District #1
Post Office Box 52
Elko, Nevada 89801
(702) 738-5716

August 8, 1983

Mr. Rodney Harris, District Manager
Elko District Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

3

It has come to our attention that a severe discrepancy exists between the wildlife numbers contained in the draft Wells Resource Area Environmental Impact Statement and the numbers the Nevada Department of Wildlife gave to your agency in 1978 or 1979. According to information given to our consultant by NDOW personnel, the numbers provided by NDOW were intended to reflect their best estimate of reasonable numbers for big-game animals.

An analysis of NDOW's estimate of reasonable numbers for deer showed a range of from a low of about 46,000 (for 8 months) to a high of about 54,000 (for 1 month). The average for the year was about 49,000. These numbers include deer using adjacent National Forest lands, large blocks of private land and other BLM Resource Areas as well as lands within the EIS area.

3

NDOW's reasonable number of deer using Wells R.A. BLM lands would range from about 15,000 (for 5 months) to about 31,000 (for 1 month). The average would be about 20,000 head.

The EIS gives 73,000 as the reasonable number for deer, and shows the existing number of deer as 38,700. A similar discrepancy exists with the antelope numbers.

If you will look closely at the above numbers, I am sure you will agree that this is a significant error and that corrections should be made in the analysis of impacts of the various alternatives.

Very truly yours,

Roy Young
Roy Young, Chairman

RY/sa

4-37

Nevada Grazing Board of District #1
Post Office Box 52
Elko, Nevada 89801
(702) 738-5716

August 12, 1983

Mr. Rod Harris
District Manager
Interior Department
Bureau of Land Management
2002 Idaho Street
Elko, Nevada 89801

Dear Mr. Harris:

Enclosed are our comments on the Wells Resource Area Resource Management Plan and Environmental Impact Statement. Also enclosed is an alternative we are suggesting for the Resource Management Plan.

Please consider these documents carefully when you are preparing the final EIS and are selecting the alternative implementation.

Very truly yours,

Roy Young
Roy Young, Chairman

RY/sa

Comment Letter 16

NEVADA GRAZING BOARD OF DISTRICT N-1
COMMENTS ON WELLS RESOURCE AREA RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT
by Lester A. McKenzie

GENERAL COMMENTS:

Page 2-1, Resource Conflict Areas:
Dividing the Resource Area into units with similar problems probably expedited the preparation of the RMP and EIS. The choice of the word 'Conflict' was unfortunate, however, because it indicates the authors had preconceived conclusions about the interaction between the resources prior to starting on the RMP and EIS. The use of this term establishes a negative tone for the whole document.

Page 2-2, last sentence of 2nd paragraph under 'Selective Management Criteria':
'All range improvement projects proposed in this document are for category '1' allotments.'

15

According to this, only 25 of the 89 allotments would have any improvement work done. Many 'C' and 'M' allotments have rather serious livestock distribution problems that can be solved only by installing water developments and fencing. Are these allotments to be ignored until management plans have been implemented on all of the 'I' allotments?

Page 2-2, last sentence of 2nd paragraph under 'Management Alternatives':
'No specific management actions will be analyzed for R/C areas'

This sentence (read together with map 2-7) seems to say that no work will be done outside of the checkerboard pattern. Surely this is not what was intended!

2

The subject of Disposal, R/C and R/M is confusing and should be explained in greater detail.

Page 2-7, No-action alternative:
The alternative as written is not realistic. Continuation of present uses and levels would still require compliance with law and with Washington and State office directives. Actual practice would be considerably different from the picture painted by the description of the No-Action alternative contained in this

Comment Letter 16

document. Several examples are listed below.

1. Wilderness study requirements would still be in effect, and quite likely at least a portion of at least one of the study areas would be recommended.

2. Expenditures would be made for improvements and these would be covered by plans and EAR documents.

5

3. The licensed use could easily change from year to year, depending on precipitation, economic conditions, etc. The three to five year average use means nothing as far as range carrying capacity or adjudicated use is concerned. This needs to be explained very clearly in this document.

If this is truly a 'No-action' alternative, what would cause the change in the market value of AUM's, shown in table B-2, and other minor changes throughout the document?

The no-action alternative could never be carried out as described and the only justification for including it is to provide a range of alternatives for analysis. It falls short of meeting this need.

It would be interesting to see an analysis of a true no-action alternative which described the minimum action capable of meeting all requirements of law and regulations.

Page 2-9, Resource production alternative:
In part, the goal stated for this alternative is: '...to emphasize the management of the resources contributing to the commercial well-being of the Resource Area....'

16

The management actions described for the alternative seem to be near the maximum practicable for lands, corridors, woodland and minerals. Actions described to benefit grazing and other economic uses are quite conservative in most instances. For example, the PROTECTION alternative has more spring developments, more ponds and more brush burning than the PRODUCTION alternative.

17

Later pages in the document make quite a point of the monetary value of recreation and credit most of the recreational use to wildlife attractions. It seems that an alternative designed to emphasize 'commercial well-being' would address those recreational activities that contribute or have the potential to contribute dollars to the local economy. Omitting actions

Comment Letter 16

N-1 GRAZING BOARD Comments on Wells R.A. RMP/EIS Page 3

17 designed to enhance the recreational benefits of fisheries and wildlife tends to further the misconception that grazing, mining and other "commercial" uses of the public lands must always be in conflict with and at the expense of recreation, fisheries and wildlife. This omission slants the comparison of alternatives by showing adverse impacts where the impact could have been beneficial, had the alternative been written differently.

The introduction to Chapter 2 states that all the alternatives are oriented toward multiple use management. A much more informative and useful EIS would have resulted if this alternative had maximized all of the uses of the area.

Page 2-22, Preferred alternatives:

The second sentence of the first paragraph states, in part: "...this alternative chooses the best management action for each issue to fit the specific RCA." We seriously doubt that the actions proposed for wilderness, livestock grazing, wildlife habitat, riparian area treatment and wildhorses are the best management actions.

Pages 2-27 and 2-28, Implementation, Selective Management Criteria; and tables A2-1, Allotment Categorization: The land ownership objectives are unclear. One interpretation of the category M objective is that these lands will be kept in the present ownership (the same state). However, several allotments listed as category M are in the checkerboard land pattern, where exchanges to block up ownership would facilitate the management of both public and private lands.

18 The land ownership objectives for category I and C both refer to the "planning system". I was under the impression that the RMP was the plan being developed under the "planning system" and as such would identify the specific lands that would be retained because of special resource values and those that would be offered for exchange, sale or other disposal action.

Item 7, under each of the category descriptions, combines into one factor the most important characteristics being considered in the categorization process. Condition, trend and potential should all be given prominence in the determination of priorities for the installation of range improvements and the implementation of management plans.

It is apparent that livestock operators were not consulted prior

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N-1 GRAZING BOARD Comments on Wells R.A. RMP/EIS Page 4

18 to assigning their allotment to a category. The needs and desires of these people must be considered if the system is to work properly.

Page 2-29, Livestock Grazing Treatments:

The great variation in elevation, exposure, climate and other factors makes the use of specific dates in this broad, overall plan unrealistic. It would make more sense to describe the treatment in terms of growth stages of certain plants, then tailor the dates to the individual allotment (or portion thereof) when grazing plans are developed.

Page 2-30, Monitoring:

Monitoring was started on a very limited scale in 1981 and there is no way you can determine livestock stocking rates by 1984!

2 Last sentence under "Utilization":

You will not manage for 55% utilization on ALL perennial grasses and 45% utilization on ALL shrubs. God help the range and the livestock both if you use 45% of the current year's growth on big sagebrush or rubber rabbitbrush!

Climatic data:

The sources named should be supplemented by BLM and cooperator operated precipitation and temperature stations. The extreme variation between locations, even in the same valley, makes it important that as much data as possible be obtained and that you DO NOT attempt to average the data from various stations to compute climatic adjustment factors.

Condition and Trends:

You do not have soils and range site descriptions for most of the resource area at this time. How do you intend to arrive at condition during the interim period, while soil surveys are being completed, sites described and correlation accomplished?

Page 2-31, third paragraph, last sentence:

This sentence indicates that monitoring would not be done under the "No Action" alternative. Isn't monitoring required by Washington and/or State memoranda?

8 Page 2-32, Standard Operating Procedures:

The wording of procedure #9 indicates that the recommendations contained in the Western State's Sagegrouse Guidelines will be

Comment Letter 16

8 considered as specifications, rather than as guidelines to be considered in developing sagebrush modification projects. From conversation with personnel of the Elko office of the Nevada Department of Wildlife, it appears that BLM biologists may be interpreting the 'Guidelines' much more strictly than are NDOW biologists.

7 Page 2-32, Standard Operating Procedure number 23:
Who determines whether or not this is feasible? Who pays the cost of pumping during the off-season or the cost of repairs caused by freezing watering facilities operational during a rest period?

Page 2-22, Standard Operating Procedures number 24, 25 & 26:
Who will be responsible for the operation and maintenance of these modifications? Would they be required on improvements constructed under section 4 permit, where the operator is paying the cost of the project?

Page 2-31, Standard Operating Procedure number 29:
Is crested wheatgrass considered to be a native species for any purposes?

Page 2-32, Standard Operating Procedure number 31:
This is an excellent change from the statement contained in the Planning Criteria document.

Page 4-2, General Assumptions, number 7:
'Best available' data on vegetative condition, trend and habitat condition are based on 'professional judgement' which is an educated guess at best and may include personal bias at the worst. While these judgements may be adequate for general planning purposes, they may not provide a suitable basis for the analysis of impacts.

ISSUE #1, LANDS:

Page 4-15, Social impacts:
I saw nothing in the no action alternative prohibiting land exchanges and nothing in the other alternatives encouraging them.

ISSUE #2, CORRIDORS:

Comment Letter 16

Page 4-19, Resource values would be degraded:
Merely designating corridors would have no effect on riparian quality, wilderness character or wildlife habitat. The chances that 1,023 miles would be used is extremely remote, but designation would provide flexibility and save a great deal of time and expense in the future. Is it really logical to blame bald eagle shooting deaths on a powerline? Come on now, why not blame the gun or the car?

ISSUE #3, ACCESS:

Page 1-4, Planning Criteria:
Legal access across private lands will be difficult to obtain unless something is done to relieve land owners of liability for injuries or property damage claims that may result from such use.

ISSUE #4, RECREATION:

Page 1-5, Planning Criteria:
Closure to ORV use should be considered to prevent damage to fragile soils and other resources, to prevent harassment of livestock and to prevent interference with other uses.

Page 4-7, first paragraph:
Why would the facilities at Ruby Marsh Campground be less than properly maintained under the no-action alternative? The alternative suggests no reduction in maintenance funds. If the facility is not being properly maintained now, then nothing would change, so there would be no impact, either beneficial or adverse.

Page 4-8, ORV:
The designation of the WSAs as wilderness would be adverse impacts to recreation under all alternatives except no action. Persons depending upon motor vehicles to use these areas would be excluded. This number probably includes nearly 100% of the people now using the areas and those projected to use the areas without wilderness designation.

Page 4-15, Economic Impacts:
The reported economic impact on recreation is based largely on projected decreases in big-game and fisheries habitat. Since the conclusion that these decreases would occur is based on questionable assumptions, there is no real evidence that the

Comment Letter 16

N-1 GRAZING BOARD Comments on Wells R.A. RMP/EIS Page 7

economic impact would be as stated.

ISSUE #5, WILDERNESS:

The recommendation to designate these areas as wilderness is, in our opinion, not the best management action for this issue. The three southern areas are very similar to each other and to other nearby mountain ranges in topographic, vegetative and other characteristics. They are all short of water. They certainly have the capability to provide solitude, but it is not really 'outstanding' when a similar opportunity is available in so many places in northeastern Nevada. Can the recreational opportunities be called outstanding when an area is so dry and is so similar to much of the surrounding country?

69 Two of the areas contain cherry-stemmed roads and all have so-called ways leading to mining claims, wood cutting areas, christmas tree harvest areas and livestock handling facilities. Some of these 'ways' have had occasional maintenance performed to keep them passable. The existence of these features and the habits and needs of the people who created and have used them will make management difficult. The May 1982 issue of the Management Situation Analysis discusses the need to evaluate the closure of the cherry-stemmed roads to improve manageability. If closure is necessary to maintain wilderness qualities, the areas are not roadless in the first place and shouldn't have been considered as potential wilderness.

70 Table 3-11, on page 3-20 shows a calculation of User Day Benefits for recreational usage of the four WSAs under the assumptions of designation and non-designation. How were the visitor day numbers for the existing situation obtained? Access to the Badlands is pretty well limited to crossing occupied private land. How could 500 people have entered this area without having been seen by the land owners? Were these numbers actual counts or were they just based on visitor day estimates made on similar sized areas somewhere else? Why are these numbers so different from those shown in table 3-21, page 104 of the May 1982 issue of the Management Situation Analysis?

If there were 500 people in the Badlands, or 300 people in Bluebell, or 800 in Goshute Peak or 150 in South Pequop during 1981, the majority most likely was there to gather firewood, cut christmas trees, collect pinenuts, hunt deer or carry out some other activity having nothing whatsoever to do with solitude or a wilderness experience. This majority, most likely, used a motor

Comment Letter 16

N-1 GRAZING BOARD Comments on Wells R.A. RMP/EIS Page 8

71 vehicle to get to where they were going and would not have been there had they not been able to use the motor vehicle. If there were 1,750 recreational visitor days on these 4 areas, how many use days resulted from people working with livestock, prospecting for minerals, or doing something else not qualifying as recreation? The impacts on all the people presently using these areas have not been adequately considered in making this recommendation.

We question the accuracy of the estimated number of visitors for the existing situation and must also question the projected numbers. The percentage increase portrayed aren't realistic. Why would the visitation to South Pequop increase 667% while the visitation to Goshute Peak only increase 375%? According to table 3-18 of the MSA, Goshute Peak is larger and offers a more varied selection of 'attractions' than does South Pequop. Visitation to Badlands would increase only 400%, in spite of it's being the most desirable of the four areas.

Assuming these projections are accurate, what would be the impact on the physical environment of injecting 3,000 visitor days into the Goshute Peak area or 2,000 into the Badlands? What would be the effect on wilderness quality itself? That narrow strip of land on each side of Salmon Falls Creek would certainly show the effects of man's presence if you encourage 2,000 people to spend the day there by designating it as wilderness. What would it do to the solitude that now exists and is likely to remain if the area is NOT designated?

Page 3-4, Affected Environment:
The descriptions contained in this document and in the Wilderness Technical report paint a pretty picture of the so-called wilderness qualities of these WSAs while down-playing the value and potential value to other uses. The tone of these documents makes one wonder if they were not developed to sell wilderness, rather than to provide unbiased information for someone else to use in making a decision.

2 Page 4-10, 3rd paragraph, left column:
This paragraph seems to indicate that the designation or non-designation as wilderness would have an effect on the use of the WSAs by sheep. Nothing I have seen in the Wilderness Act would cause a change in the class of livestock using an area.

ISSUE #6, LIVESTOCK GRAZING:

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Page 1-7, Planning Criteria 3a: Burning, spraying or mechanical control without seeding are usually disappointing on sites where desirable species make up less than 25% of the production. The degree and rapidity of improvement, due to brush control, is directly proportional to the abundance of desirable species in the plant community being treated. Satisfactory improvement of communities having less than 25% desirable species most often requires seeding of adapted species, in addition to brush control.

Page 2-23, Objectives: It is more accurate and meaningful to say the projected number of AUMs constitutes an 85,433 AUM or 25% reduction from preference rather than say it is an increase of 4,712 AUMs over the three to five year licensed use.

The 3-5 year average use simply indicates the amount of voluntary non-use taken, for various reasons, over the 3-5 year period, and has no relationship to carrying capacity or range condition. This can be illustrated by comparing the percentages contained in Table 2-1 with the rating of condition, trend, etc. used in the categorization of allotments (appendix Table A2-1):

The condition-trend etc. factor was rated 'I' on 23 of the 89 allotments. On these 23 allotments the 3-5 year use ranged from 43.7% of preference to 115.9% of preference, with an average of 83.3%;

This factor was rated 'M' on 50 allotments, with the 3-5 year average use/preference ranging from 15.1% to 151.3%, or an average of 80.1%;

It was rated 'C' on the remaining 16, with the 3-5 year average use/preference ranging from 33.2% to 117.3% for an average of 80.5%;

Overall, the range was from 15.1% to 151.3% with a simple average of 81.1%. The weighted average was 76.2%, reflecting the effect of several fairly large sheep allotments with low usage because of economic, labor, predator and other factors having nothing at all to do with range condition or carrying capacity.

In other words, the allotments categorized as 'I', because they need improvement, showed the least non-use being taken, while the allotments said to be satisfactory averaged the highest percentage of non-use. Which is wrong, the professional judgement used in categorizing the allotments or the theory that the 3-5

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year average licensed use reflects the carrying capacity of the allotment?

Page 2-23, Short-term Management Actions: The need and potential exist for much more range improvement work than is indicated in paragraphs 1 and 2 under this item.

My understanding has been that this document discusses no improvement work for lands identified for disposal, so why include the phrase "...excluding areas identified"? There certainly are enough suitable seeding areas not so identified to make room for much more than 35,500 acres.

How would grazing systems be implemented on category 'M' and 'C' allotments unless you install fencing, water developments and other range improvements? How did they get in the 'M' and 'C' categories in the first place if grazing systems are needed? Doesn't this need indicate that management is not satisfactory, the activity plan is not satisfactory, condition and trend are not satisfactory, improvements are not satisfactory and there is a potential for economic return on the investment?

Page 2-23, Long-term Management Actions: The proposed program should be designed to provide sufficient forage to supply at least the full preference number of livestock and REALISTIC reasonable wildlife numbers. The improvements necessary to accomplish this should be programmed over a several year period to avoid much of the impact on the land and on budgets. It would be impractical to try to accomplish the necessary improvements on a short-term basis, since funds may not be available to carry out even the modest amount of improvement work discussed in this alternative over the period of time described.

The preferred alternative should make provision for privately financed range improvements on all categories of allotments.

Page 3-7, Affected Environment, Livestock Grazing: 379,279 AUMs represents the current active grazing preference, not the total grazing preference. More than 25,000 AUMs of suspended non-use listed on grazing permits are completely ignored. Suspended AUMs make up approximately 2/3 of the preference on one allotment and approximately 1/3 of the preference in the Ruby/Wood Hills area. AUMs were suspended for a variety of reasons, ranging from punishment for some infraction of the rules to a temporary adjustment to facilitate the

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5 | Implementation of a grazing system. Most permittees were apparently told that the AUMs would be restored after a certain date or after certain management objectives were attained. Others were promised range seedings, and/or other improvements to restore suspended AUMs, but these were delayed pending the completion of the EIS.

The number of suspended AUMs is significant in the evaluation of the economic effects of the grazing reductions proposed under the various alternatives and should be shown in the report.

19 | Table 3-2, 'Livestock Grazing Characteristics': The data under the column headed 'Net Ranch Income' do not reflect true net income because they do not include two very important items of expense-depreciation and interest on investment. These are significant costs for ranch operations, just as they are for motels, service stations and factories. These costs should be included to avoid the erroneous conclusion that each AUM provides a net return of \$18.74. (\$5,416,600 divided by 288,934 AUMs)

20 | Tables A5-1 contain some questionable information that could significantly effect the economic computations: The prices used in calculating the total value of livestock production are out of line on today's market and probably are considerably higher than the average received by ranchers during the 1978-1980 period.

21 | Calving percentages and sale weights are usually significantly lower than average on the very large operations because the owner or manager cannot pay as much personal attention to the details of good animal husbandry. This report shows these figures and other operational parameters to be the same for all four herd sizes analyzed.

22 | All four tables show the same calf crop percentage, loss percentages, replacement rate, cow/bull ratio, sale weight and price per pound. Why then, is the production value per cow so much lower for the less than 200 head operation than it is for the other three? Rounding would account for some of the variation, but certainly not 16% and more.

23 | The grazing fee costs stated are not consistent with the percent federal land forage dependency listed in the foot notes for the various herd sizes. For example, there is no real reason why, for the 0-199 cow operation, grazing fees for a National Forest permit providing 1% of the year's forage should cost \$10.06/cow

23 | while a BLM permit providing 30% of the year's forage costs \$12.31.

24 | The 21% of a year or 2.5 month feeding period is not long enough for Elko County conditions. A more realistic 3 month period would increase hay and protein supplement costs by about 20%.

25 | The total labor cost per cow (family labor plus hired labor) shows a rather unusual variation between the four different size operations. The 0-199 and the 500-999 head units both require about \$42 per cow, the 200-499 head unit requires \$69 per cow and the 1000 plus unit requires about \$26 per cow. It is difficult to understand why the 200-499 head operation requires 65% more hired labor per cow than does the 500 to 999 head operation and at the same time utilizes 65% more family labor than does the larger unit. One would certainly think the results of this amount of labor would be evidenced in increased calf crop, heavier weights or some other factor.

Probably none of the above flaws is fatal by itself, but if these and others I have not listed were corrected, the result of the economic analyses might look much differently.

Page 3-25, Condition:

This is the first EIS I have seen acknowledge that the present vegetative condition is a result of past, rather than present, grazing practices. This paragraph also indicates that some improvement is taking place under existing use. Congratulations!

Page 3-2, Condition, 2nd paragraph:

2 | The third sentence of this paragraph indicates that trend studies will be finalized when soils information becomes available. The monitoring of trend should be a permanent part of the management of rangelands and should never be 'finalized'. Properly interpreted soils information is useful in selecting and evaluating locations for monitoring studies and in establishing realistic goals and objectives for management, but play very little part in actual trend analyses.

2 | Table 3-12 contains some rather obvious errors in the lists of species associated with the various types. Examples: Idaho fescue is missing from the Sagebrush-Rabbitbrush and the Mountain shrub types and should definitely NOT be listed in the Saltbush type.

2 | Page 4-3, Livestock Grazing, assumption #1: This assumption indicates that monitoring will be discontinued

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2 after sufficient information has been obtained to make grazing level adjustments. The word 'completed' should be eliminated to avoid this interpretation.

26 Page 4-15, Economic Impact, Livestock Grazing: This paragraph states that the no action alternative would have no impact on the ranching economy. Why then does table A5-2 show a negative economic effect when compared with the existing situation and table B-2 show an increase in the market value of AUMs under the no action alternative?

Page 4-16, Social Impacts, Livestock grazing: The statement that the no-action alternative would not be the rancher's first choice is questionable. The no-action alternative would not preclude the installation of necessary range improvements.

Page 4-21, Livestock grazing: The projected overall increases in AUMs would not be distributed among allotments within an RCA in accordance with their need for improvement. Example: Spruce-Goshutes has 14 allotments, all of which used less than active preference over the past 3-5 years, according to table 2-1. Only 3 of these are in category 'I', so only 3 could be improved and receive a portion of the 70,000 AUM increase projected for this RCA. Of the 89 allotments, 56 used less than the permit, but only 25 were placed in category 'I'.

As written, the Resource Production alternative could not possibly result in seedings which would be located properly to provide for the spring forage needs at current livestock numbers

and the majority of the requirements for additional livestock numbers'. Improving 25 allotments just would not get this job done.

27 Page 4-21, 2. Native range...: Over the long-term, proper grazing management should result in AT LEAST a one condition class improvement on areas of native vegetation that are presently in fair or better condition. Table A2-2 shows that only about 20% of the R.A. is in poor condition. Therefore, if just the category 'I' allotments are treated, the improvement in condition on at least some of the RCAs should far exceed the threshold of significance. You are overlooking the fact that vegetative trend will be monitored on all allotments and appropriate adjustments made under this alternative.

Page 4-21, No added costs...:

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This is a questionable determination. The possibility that BLM may someday close the cherry-stemmed roads because they interfere with the wilderness character was discussed in the MSA and therefore should be considered in determining the impact.

Page 4-22, Loss of livestock grazing...: The loss of forage is not the major adverse impact that would result from fencing riparian areas:

28 1. Fencing proposals exist on allotments having existing, properly functioning grazing systems. The insertion of fenced strips may cut the fields into such small segments as to interfere with the functioning of the system;

2. Fencing will interrupt the customary movement of livestock from one part of the range to another, and may cause isolated unutilized areas;

29 3. Fencing may cut off accustomed sources of stock water and adversely effect livestock performance and utilization patterns. Streams are especially valuable as water sources because they require no maintenance and can be depended upon to not fail unexpectedly except under unusual circumstances. The provision of water gaps is a less than satisfactory solution because of destructive erosion and increased fence maintenance due to crowding of livestock where water gaps are too narrow;

28 4. Fencing along sidehills may create traps which can cause death loss or injury to both livestock and wildlife;

5. Locating fences to avoid the impact stated in 4 could cause many more than 1,610 acres to be eliminated from grazing under this alternative;

7 6. Fence maintenance will be a problem. Part of the sales pitch so far has been that BLM will maintain the fences. This could change at any time, resulting in either the requirement that the permittee maintain the fence or abandonment which would in time result in down wire strung out across the landscape. Trespass will undoubtedly result from improper or no maintenance, or from poor fence location or construction. Many ranchers are hard-pressed to maintain the improvements they have now, let alone fences which are going to be of no importance to their operation.

The order in which the above impacts are listed has no bearing on their importance. Some of the above impacts could be avoided by

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proper planning of all the resource needs on an allotment prior to the implementation of any major changes or improvements.

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Page 4-33, paragraph beginning at bottom of left hand column: Vegetative improvement under the resource production alternative should be at least as great as is shown here because of the more intensive management proposed under that alternative.

Page 4-39, Livestock grazing: If no increase in AUMs is projected, why this exercise? How can a 3.5% increase in sales result in an 11.1% decrease in net income while a 2.1% sales increase results in a 16.1% increased income?

Page 4-41, Livestock grazing: All of the alternatives depend upon monitoring of vegetation to determine if management adjustments need to be made. If monitoring is done realistically, cooperatively and fairly, there is no reason to believe that ranchers will be 'dismayed' at the results.

Page 4-45, Native range: The many long-term enclosures located throughout northern Nevada indicate that complete exclusion of livestock does not necessarily result in improved native range condition.

ISSUE #7, WILDHORSES:

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Page 4-45, Wildhorse numbers: What on earth would be the rationale for allowing wildhorse numbers to increase by 100% in the Protection alternative? This is an unmanaged, 12 months of the year use. The impacts of this destructive use are not addressed.

ISSUE #8, TERRESTRIAL WILDLIFE HABITAT:

Page 2-24, Short-term management actions: The practices anticipated to manage the proposed ACEC should be specified.

Page 2-24, Short & long-term management actions: The actions anticipated to improve habitats for the reintroduction of 'native' species should be specified so environmental and other effects can be identified.

The actions anticipated to manage the non-aquatic aspen and

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mountain mahogany habitats should be specified so environmental and other effects can be identified.

What would be seeded in the 5,500 acre project(s) for big-game? Would this (these) project(s) also benefit livestock? If not, how would it (they) be protected from livestock use? I could find no mention of the environmental or other effect of this action.

The actions anticipated to improve the 50,000 acres of crucial deer winter habitat should be specified so the environmental and other effects can be identified.

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Page 3-9, Big Game Populations and Habitat Conditions: Appendix table A3-1 is said to contain reasonable and existing big-game numbers provided by the Nevada Department of Wildlife in 1977 and 1978. A comparison between the numbers contained in this table and copies of the NDDW information, obtained from BLM biologists in 1980, indicates that some mistake in tabulation must have been made. For Mule Deer, table A3-1 shows a reasonable number of 73,700 while the NDDW information indicates a peak month reasonable number of 54,000. The NDDW number includes deer using National Forest Lands, private lands and BLM lands outside of the Wells Resource Area. The maximum reasonable number projected for BLM lands within the Wells Resource Area would be 31,000 head on the first day of March. The minimum number projected for Wells R.A. BLM lands was 15,000 head for a five month period, June through October. Note that the above numbers for BLM lands still include deer that would use a significant acreage of privately owned lands, much of which comprises the better deer habitat. Also note that the peak 'reasonable' number obtained from the NDDW sheets is not very much higher than the 'existing' number reported in the EIS. A similar discrepancy exists in the antelope numbers.

Wildlife habitat condition was determined by numerically rating several existing habitat features against a specific optimum condition for those features, then totaling the ratings to obtain

percent of optimum. This method of evaluation does not take into consideration the capability of the site to produce the desired characteristics. It is based solely on whether or not the desired attributes are present or absent.

Obviously, not every one of the 4.5 million acres of BLM lands in the Wells R.A. has the capability to provide all the attributes it takes to rate as good or excellent deer, antelope, elk or bighorn habitat. Many acres in this area are not used at all by

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big-game species. Many heavily used acres can supply only part of the things required or the quality of what is supplied may be mediocre. These acres may be rated only fair or poor because the site is unable to produce good or excellent condition due to soil, moisture, elevation, exposure, temperature, fire or other environmental factors having nothing to do with competition from livestock.

The determination of the trend in condition for any use requires rather precise measurements over a period of several years. The results of these measurements must be evaluated very carefully, considering the effect of weather conditions, wildlife and livestock use, fire, insects, rodents and other variables. The studies for the Wells area EIS have not been going on for long enough to make meaningful comparisons, nor to identify the cause of a trend if it did exist.

NDOW personell tell me that the trend in deer and antelope numbers is generally upward. Would this be happening if habitat conditions were so bad and in a downward trend?

In spite of the lack of solid data, the EIS cites livestock competition as the primary reason for the 'decline' in deer habitat, antelope habitat and Elk habitat. The statement near the top of page 3-10: 'Elk habitat is in poor condition at lower elevations primarily from livestock competition.' is a good example of this. The most significant cause of poor elk habitat on the low elevations of Pilot Peak is connected with site attributes, not with livestock use. This area is just naturally marginal elk habitat and even complete removal of livestock will not allow it to provide the attributes required to rate as good or excellent condition.

Page 4-5, Determination of significant impacts, Terrestrial Wildlife Habitat:
'Threshold' number 4 states that any action which results in 50% or more of the known condition of big game habitat being in fair or poor condition is an adverse impact. Table A3-2 indicates that more than 50% of the known condition of deer habitat and 100% of the known condition of antelope habitat are in fair or poor condition at the present time. How can this be a suitable 'threshold' for determining the effect of an alternative when the existing situation already exceeds the stated level?

No data is presented to show that 50% of the area used as big-game habitat has site characteristics capable of supporting fair or better habitat condition. Without evidence that this

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amount of improvement can be attained, 'threshold' number 4 is not supportable. The inclusion of 4 and 5 is really unnecessary because 'threshold' number 3 adequately covers the impact of any estimated change in habitat condition.

Hopefully 'threshold' number 5 is not referring to table A3-1 as being NDOW's definition of 'reasonable numbers'.

Page 4-10, 2nd paragraph, right column:
The terrestrial wildlife inventory referenced in this paragraph does not provide a basis to support the statement that 50% of all fair or better habitats will deteriorate by one condition class. As has been stated previously, the determination of trend must be done over a period of time. A one point-in-time estimate has no validity when dealing with a dynamic vegetative community.

Page 4-10, 3rd paragraph, right column:
BLM habitat studies have not been carried out for sufficient time to identify a trend in condition. If the rate of deterioration alluded to in this paragraph and on the following page had been constant throughout the 100 plus years these lands have been grazed, all habitat areas would have been reduced to poor condition or would have been destroyed. There is evidence showing that big-game numbers are much greater now than they were when white man first settled Elko County. If the habitat had been plentiful at that time wouldn't there have been deer and antelope to fill it?

The winter of 1982-1983 was rather severe. However, there were no reports of a significant die-off of deer, such as occurred during previous heavy snow winters. Since winter range seems to make up the bulk of the crucial ranges rated as poor condition in this document, wouldn't there have been die-offs if conditions are really as bad as portrayed?

31 | Page 4-22 and 4-23:
The assumptions relating to the deterioration of big-game habitat are both unrealistic and arbitrary. A well accepted principal of range management is that all perennial forage species including grasses, forbs, shrubs, half-shrubs and trees will benefit from periodic rest during the growing season. The assumption that the management proposed in the resource production alternative would cause browse to enter into a downward trend is not supportable.

31 | Page 4-35, Big game habitat would
There is no basis for the assumption that the change in the

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condition of big-game habitat would be any different for this alternative than for the resource production alternative. The basic difference between the two alternatives is stocking rate and the amount of range seeding proposed. Livestock stocking rate has much less effect upon vegetative condition than does season and frequency of use, kind of management system and other factors.

ISSUE #9, RIPARIAN/STREAM HABITAT:

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Page 2-25, Objective:

The worthy objective of improving these habitats to good or better condition may not be physically attainable because the site may not have the characteristics necessary to support the attributes required in good or better condition. For example, a fisheries habitat study was done on the upper Mary's River by the Forest Service and NDOW, using essentially the same criteria as is used by BLM. One section in the upper reaches was rated fair condition with a remark to the effect that the site was essentially pristine, with little or no evidence of livestock related influences. Obviously, the site did not have the potential for any better condition. Quite conceivably this is not a unique circumstance.

Page 3-11, Riparian/stream habitat:

The procedure used to evaluate fisheries habitat is explained in several of the paragraphs on the left side of page 3-12. The fifth full paragraph on this page discusses the primary rating factors and the number of streams where these factors were in poor or fair condition.

These five factors, as well as the 'Priority B' factors, are all effected to some degree by one or more of the following: gradient of the stream bed; soils and soil parent material on the watershed and in the area of the stream channel; magnitude of the peak and minimum water flows and the relationship between the annual high and low flows; geologic conditions and events; other environmental factors; and man caused disturbances.

On most streams, the things that man cannot control have more influence on some of the rating factors than do the things he can control. The gradient of the stream bed, for example, controls the velocity of the water, which in turn effects: the kind of material on the stream bed; the ratio of riffles to pools; the width of the channel in relation to water depth; the quality of pools; the stability of stream banks; and in some cases the kind

of vegetation along the stream. The degree to which gradient will effect these factors is in turn dependent upon hydrologic, geologic, soils and other topographic conditions.

Because of the complex relationships involved, persons familiar with all of these sciences should be included on the team charged with trying to determine the reason a stream is in a particular condition and how much potential it has to reach a better condition. The joint stream inventories, referred to on the 3rd paragraph on page 3-12, were not made by such a team. The conclusion that a stream is in deteriorated condition due to livestock grazing (p 3-14, 3rd par.) may therefore be erroneous in more cases than it is right. Because each stream segment is unique and different, the success or failure of a certain treatment on a few selected stream reaches will not necessarily mean that all other streams will, or will not, have a similar response to that treatment.

Page 4-5, Determination of significant impacts, Riparian/stream habitat:

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As previously stated in these comments, not all riparian/stream habitats are located on sites capable of supporting good or better condition. Until condition is defined as being in relationship to the potential for the site, a threshold of good or better condition is unrealistic.

Page 4-17, Riparian/stream habitat:

The phrase 'subtle changes in riparian condition' bears out the previous comment that only long-term studies and investigation by an interdisciplinary team can determine the actual trend and condition of these areas.

The purpose for this EIS is to disclose the environmental effects that would result from the implementation of the five RMP alternatives. Since the RMP properly does not propose any treatment on privately owned land, the EIS should not include private acres and miles of stream when discussing the various kinds of wildlife habitat. The range people were able to separate the BLM administered lands from the privately owned lands when listing range types and estimating ecological condition. It should have been easier for the wildlife people because they are talking about fewer acres.

Including private property adds emphasis to the point the biologists are trying to sell, but the condition and trend of privately owned habitat (particularly fenced lands) is of absolutely no importance to the determination of the impacts of

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the treatment of public lands. It is no more the concern of BPP that privately owned stream segments might be deteriorating or improving than it is that the private lands might be eroded as a result of irrigating the hay needed to winter the cows that graze BLM lands. There are other agencies and other programs charged with working with land owners to evaluate and solve problems on private land.

Respectfully submitted,

Dexter A. McEnzie

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Certified Range Management Consultant

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SIXTH ALTERNATIVE
Wells Resource Area Resource Management Plan

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This alternative, being proposed by the Nevada Grazing Board for District N-1, is multiple use oriented, stressing a workable approach to resource management in the Wells Resource Area. Units of various practices and issues have not been quantified in most cases, because these numbers should remain flexible to permit appropriate adjustments to be made.

OBJECTIVE/MANAGEMENT ACTIONS

ISSUE 1: LANDS

Objectives: (Same as preferred alternative)

Short and Long-Term Management Actions:

1. Dispose of 93,150 acres, including community expansion lands, primarily through public sale.
2. Expedite land exchanges for the purpose of blocking up ownerships to permit more efficient management of both public and private lands.

ISSUE 2: CORRIDORS

Objectives: (Same as no-action)

Short and Long-Term Management Actions: Designate reasonable width transportation and utility corridors along existing rights-of-way. Require use of these corridors for future developments wherever feasible. New corridors will be considered for designation on the basis of economic justification, proximity to existing corridors and complete environmental studies of alternate routes.

ISSUE 3: ACCESS

Objective: To acquire legal access for routes necessary for

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resource management

Long-Term Management Action: Acquire access through negotiation with land owners as needs are identified and opportunities arise.

ISSUE 4: RECREATION

Objective: To provide a range of recreation opportunities while protecting fragile resources and avoiding interference with other uses.

Short-Term Management Actions:

1. Upgrade facilities at existing developed recreation areas.
2. Close 160 acres in Ruby Marsh campground to ORV use.
3. Identify areas of steep slopes and fragile soils for closure to ORV use.
4. Identify areas where ORV users are harrassing wildlife or livestock or are interfering with other land uses and close these to ORV use.

Long-Term Management Action: Continue to evaluate the need to develop additional recreational areas and install facilities as needs and opportunities arise.

ISSUE 5: WILDERNESS

Objective: (Same as no-action)

Short and Long-Term Management Action: (Same as no-action)

ISSUE 6: LIVESTOCK GRAZING

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Objective: To increase the yield of useable livestock forage sufficiently to meet at least the full grazing preference demand on all allotments where the potential exists to sustain this level of use and the livestock operator is willing to actively cooperate in planning and implementing the improvements and management actions necessary to meet this objective.

Short-Term Management Actions:

1. Review the categorization procedure described in the RMP/EIS document and, after consultation with the grazing operators, re-categorize the allotments, placing greater emphasis on range condition, range trend and productive potential and on the desires of the livestock operators.
2. Develop grazing plans for those allotments where extensive improvements and/or grazing systems are needed and practical, and where the livestock operators are willing to participate. Plans will consider all uses of the allotment and will include the treatments and practices needed for wildlife habitat improvement and other uses as appropriate.
3. Install needed water development projects on those allotments having treatable livestock distribution problems.
4. Install monitoring studies on allotments where grazing plans have already been implemented and are functioning satisfactorily and on allotments where no grazing plans or significant improvements are anticipated.

Long-Term Management Actions:

1. Install planned livestock and wildlife improvements and management practices over a period of years to avoid a sudden, massive impact on habitats and livestock use. This will also facilitate private investment and provide a more uniform distribution of federal funds.
2. Establish monitoring studies on allotments where major changes in livestock distribution patterns have resulted or will result from the implementation of grazing plans.
3. Make adjustments to grazing systems and/or livestock numbers as indicated by the results of not less than 5 years of monitoring studies.

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ISSUE 7: WILDHORSES

Objective: To manage wildhorse herds in accordance with the mandates of law and the need to protect the resources.

Short and Long-Term Management Actions:

1. Continue to monitor wildhorse populations and habitat conditions.
- 6 2. Conduct wildhorse gatherings as necessary to reduce and maintain the total number of horses in the resource area at the 1971 number of approximately 320 head.
3. Remove wildhorses from areas where they did not occur in 1971 and from private lands if requested.

ISSUE 8: TERRESTRIAL WILDLIFE HABITAT

Objective: To enhance wildlife habitat conditions through improved livestock management, multiple use range improvements and specific habitat improvement practices.

Short and Long-Term Management Actions:

1. Modify hazardous sections of fence, located across major migration routes, to meet standards for the species of wildlife utilizing the area.
2. Maintain existing wildlife projects.
3. Work with users to develop suitable remedies in cases where monitoring shows a downward trend in the condition of crucial wildlife habitat to be resulting from other resource uses.
4. Plan and carry out multiple use projects for wildlife habitat improvement, livestock forage production and woodland management on crucial deer winter ranges.

ISSUE 9: RIPARIAN/STREAM HABITAT

Objective: To develop a recognition of the value of riparian/stream habitats and initiate a program to improve these

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habitats to a condition consistent with their potential and other resource uses.

Short-Term Management Action: Plans on allotments containing high and medium priority riparian/stream habitat systems will include provision for the improvement and or maintenance of these areas, using methods agreed to by all users of the allotment.

Long-Term Management Action: Work with users to develop suitable remedies in cases where monitoring shows a downward trend in the condition of riparian habitats to be resulting from other resource uses.

ISSUE 10: WOODLAND PRODUCTS

Objective: (Same as Preferred Alternative)

Short and Long-Term Management Actions:

1. Implement the necessary management actions to assure that Christmas tree and fence post cutting and fuelwood harvesting are done on a sustained yield basis.
2. Manage salvage cuts for both the general public and commercial users on areas where pinyon-juniper conversions for wildlife or livestock forage enhancement would occur.

IMPLEMENTATION

Selective Management Criteria for Livestock Grazing-(Page 2-27)

Category M Allotment Characteristics

Revise 4 to read-"The land ownership objective is to retain these lands in public ownership or to exchange them for other land to facilitate management."

18 Revise 7 to read-"The current ecological range condition is satisfactory."

Add "8. The trend in ecological range condition is up or not apparent."

Add "9. The potential for vegetative production is moderate to

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high.

Add "10. Watersheds are in satisfactory condition."

Category I Allotment Characteristics

Revise 4 to read-"The land ownership objective is to retain these lands in public ownership or to exchange them for other land to facilitate management."

Revise 7 to read-"The current ecological range condition may be unsatisfactory."

Add "8. Ecological range condition may be down or not apparent."

Add "9. The potential for vegetative production is moderate to high."

Add "10. Watershed conditions may be unsatisfactory."

Category C Allotment Characteristics

Revise 4 to read-"The land ownership objective is to dispose of the majority of the public lands within the allotment."

Revise 7 to read-"The current ecological range condition is not a major concern in this category"

Add "8. The trend in ecological range condition is not a major concern in this category"

Add "9. The potential for vegetative production is not a major concern in this category"

Add "10. Watershed condition is not a major concern in this category"

MONITORING-Climatic Data-(Page 2-30)

Change second and third sentences to read-"Official weather stations, BLM and Nevada State climatic stations and stations operated by cooperating ranchers would provide climatic data. This data would be used to correlate seasonal weather variations occurring in different parts of the resource area to plant growth as determined in the utilization and trend studies."

STANDARD OPERATING PROCEDURES-(Page 2-31)

Modify item 9 to read-"Alteration of sagebrush areas other

through application of herbicides, prescribed burning or by mechanical means will be guided by the procedures outlined in the Western State's Sage Grouse Guidelines, the Memorandum of Understanding between the Nevada Department of Wildlife, the results of nearby research projects and other studies."

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8-16-83

DEAR ROO,

AM TAKING A FEW MINUTES TO SEND YOU A NOTE INDICATING MY FEELINGS CONCERNING THE WELLS RMP/EIS.

IN THE LAST COUPLE OF DAYS I HAVE RECEIVED A COPY OF AN ALTERNATIVE PROPOSED BY THE NEVADA GRAZING BOARD, N-1 DISTRICT WHICH LOOKS REASONABLE TO ME AND I WOULD HOPE THAT YOUR OFFICE WOULD GIVE IT SERIOUS CONSIDERATION.

OF THE ALTERNATIVES OFFERED IN YOUR DRAFT STATEMENT THE "NO ACTION" SOUNDS THE BEST TO ME. IT ALLOWS FOR SITUATIONS TO BE HANDLED INDIVIDUALLY AND AS TIMES AND CIRCUMSTANCES CHANGE

I AM CONCERNED ABOUT THE IDEA OF BASING LONG TERM STOCKING RATES ON THE 3 TO 5 YEAR AVERAGE USE. IN OUR CASE, I KNOW THAT WE HAVE DELIBERATELY HELD

-2

DOWN THE STOCKING RATE BECAUSE WE HAVE EXPERIENCED SOME PRETTY SEVERE DROUTH YEARS AND, PARTICULARLY THE LAST THREE YEARS ON THE RUBY VALLEY SIDE, HAVE SEEN AN ENORMOUS CONCENTRATION OF JACK RABBITS; FOR WHICH REASON WE HAVE NOT STOCKED THAT AREA HARDLY AT ALL SINCE THE SPRING OF 1980.

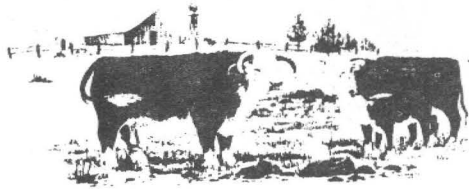
OUR PREFERENCE AUM'S HAVE ALL BEEN BOUGHT AND PAID FOR AND I FEEL STRONGLY THAT THEY SHOULD NOT BE ARBITRARILY TAKEN FROM US WITHOUT COMPENSATION.

SINCERELY,

King Jones

4-52

5



QUALITY HEREFORDS

Mr. and Mrs. Robert R. Wright
Clover Valley Rt.
Wells, Nevada 89835
752-3784

Aug. 15, 1983

Mr. Rod Harris
District Mgr. Elko B.L.M.
P.O. Box 831
Elko, Nev 89801

Dear Rod:

I wish to amend the comments that I have previously made in regard to the Wells Draft Resource Management Plan. In my previous comments I selected the "no action" alternative as being the most nearly satisfactory of any offered.

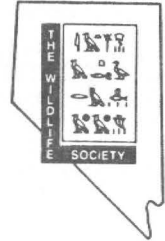
I wish to now endorse a sixth alternative proposed by the District Grazing Board. This alternative is a combination of some of the previous alternatives as well as adding some new ideas and proposals. It seems to more nearly express my thoughts on management in the Wells Resource Area.

Would appreciate you and the Wells Resource Management team giving serious consideration to accepting the alternative of the District Advisory Board.

Sincerely,
Bob
Bob Wright, Pres.
Robert R. Wright Co.

The Wildlife Society

Nevada Chapter



August 12, 1983

Rodney Harris, District Manager
Elko District
Bureau of Land Management
2002 Idaho St.
P.O. Box 831
Elko, NV 89801

Dear Mr. Harris:

The Nevada Chapter of the Wildlife Society herewith submits the following comments on the Draft Wells Resource Management Plan EIS. The Nevada Chapter also desires to monitor annual progress of the implementation of the Final RMP. The Nevada Chapter strongly supports the BLM intentions of following the Standard Operating Procedures (pages 2-30 through 2-32) in the implementation of this RMP.

The Nevada Chapter of The Wildlife Society is a non-profit organization comprised of professional wildlife biologists. The Society is dedicated to the wise management and conservation of the wildlife resources and the habitat upon which all wildlife rely for life. Ecology is the primary scientific discipline of the wildlife profession; and, therefore, the interests of the Society embrace the interactions of all organisms with their environment. The Society recognizes that man, as well as other organisms, has a total dependency upon the environment and it is the Society's belief that wildlife, in its myriad forms, is basic to the maintenance of a quality human existence.

3

We believe that the impact analysis section has not adequately addressed competition among wildlife, livestock and wild horses. The discussion of reasonable numbers of wildlife should include AUM requirements, season of use and the degree of dietary overlap among the three groups of herbivores. The Nevada Chapter supports the preferred alternative in relation to livestock grazing, assuming that reasonable numbers of wildlife can be achieved and maintained under this alternative.

The Nevada Chapter endorses the preferred alternative for fence modification, as improperly constructed fences hinder the movement of deer and antelope and may cause mortality as well. The wildlife resource is of such economic value to the area that simple fence modifications would halt the needless waste of these valuable resources and still provide livestock control. Fences in antelope range and deer winter range should have the highest priority for modification, and fence modification should meet BLM manual specifications for wildlife fences.

The Nevada Chapter supports the protection alternative for improvement of terrestrial and streambank riparian habitat. Since riparian areas comprise such a small

The International Organization of Professional Wildlife Ecologists and Managers

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Comment Letter 19

Mr. Rodney Harris
August 12, 1983
Page 2

percentage of the total rangeland resource (less than 1% of the public land in the Wells Resource Area) and are so important for wildlife and fish, they should receive maximum protection (see position statement on Riparian Habitat by Nevada Chapter of The Wildlife Society). Protection of this small acreage should not cause a significant loss of livestock forage. The impact analysis of livestock grazing effects on riparian habitat should be discussed in greater detail. Streambank riparian habitat may not be adequately protected solely by grazing systems and fencing may be necessary to improve and maintain this habitat in a good ecological condition. Benefits of fencing to livestock, range quality, watershed, wildlife, fisheries and recreation should exceed construction and maintenance costs of such fencing. Streams containing red band trout and the threatened Lahontan cutthroat trout should receive high priority for protection and improvement.

Other threatened and endangered species should receive maximum protection. Bald eagle roost and feeding areas should be managed primarily for this wildlife species. The Nevada Chapter supports the protection alternative for peregrine falcon habitats.

The Nevada Chapter supports the preferred alternative for wilderness area recommendations. Although The Nevada Chapter supports wise use of our natural resources, we believe this to be the best alternative for protection and improvement of some important and unique wildlife habitats.

The economic benefits attributed to recreation appear unrealistically low. Based on the 1980 National Survey of Fishing, Hunting, and Wildlife Associated Recreation, Nevada Supplement (U.S. Fish & Wildlife Service and Bureau of the Census, 1980), Nevada hunters expended an average of \$55.00 per hunter day while fishermen averaged \$50.00 expended per fisherman day. At these cost estimates, expenditures under the existing situation would be \$2,230,375 and would increase or decrease accordingly under the various alternatives.

We believe the values of recreation uses (fishing, hunting, backpacking, ORV use, etc.) are underestimated in the EIS and need greater attention to reflect more realistic values.

The Nevada Chapter hopes that these comments are of value to you in developing final land management decisions which will result in a healthy, productive ecosystem which supports a high density and diverse wildlife community.

Sincerely,

William A. Molini

William A. Molini, President
Nevada Chapter, TWS

WAM:mp

34

Comment Letter 20



United States Department of the Interior

FISH AND WILDLIFE SERVICE
GREAT BASIN COMPLEX OFFICE
4600 Kietzke Lane - Bldg. C
Reno, Nevada 89502-5093

August 15, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

Dear Mr. Harris:

We appreciate the opportunity to comment on your draft Wells Resource Management Plan and Environmental Impact Statement. The document adequately identifies the resource issues and current wildlife habitat conditions, particularly your coverage of terrestrial riparian and riparian stream habitats. We feel the No Action Alternative should be avoided since 82 percent of the BLM administered area is without AMPs or any other grazing system. Under these conditions multiple use would be difficult to attain. The Fish and Wildlife Service supports the Preferred Alternative if several modifications can be made.

The following section includes comments and questions on specific sections in the EIS:

Page S-2. We recommend that this table be amended to separate the economic impacts of grazing on public lands from other agriculture in the Wells RA. Figures such as the \$1,985,000 net ranch income from grazing on public lands presented on page 2-2 would be very useful to represent impacts of the proposed actions. Why is this figure not identified in Table S-2? Data on grazing fees would also be valuable. We recommend inclusion of a comparable table summarizing economic impacts upon all other multiple use activities over the 20 year period of analysis. We feel this EIS is deficient until such information is included.

Page S-3. Quantification of the No Action Alternative would be useful.

Page 1-3. Issue 1. Public lands are a significant portion of our national heritage. These lands offer opportunity for fish and wildlife management and public access to utilize these managed resources. We acknowledge that the present distribution of some public lands (for example "checkerboard" lands) can greatly hinder attainment of multiple use requirements. We recommend that land exchange be considered the primary method used to remedy existing difficulties. We recommend that equal wildlife value and public use thereof be used as one of the deciding criteria. Nationally we are dealing with a dwindling wildlife habitat base, and this approach would preclude additional losses.

86

Comment Letter 20

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Unique habitats and habitats supporting threatened or endangered species should not be considered in the above recommendation.

Page 1-4, Issue 3: We support an active program designed to secure legal access to public lands.

Page 1-7, Issue 8: We concur with the physical actions proposed in this section. However, to correct some poor wildlife habitat conditions, we recommend placing emphasis on planning criteria i. e.g., mitigation of conflicts among wildlife and other multiple users, possibly through CRMP. However, this document should be very specific to assure the CRMP process works.

Page 1-8, Issue 8 and 9: Consideration should be given to federal responsibilities toward migratory birds in management of habitats covered in issues 8 and 9. Wetlands/riparian areas are well documented as critical for many migratory birds.

Page 1-8, Issue 9: We suggest a prioritized list of proven approaches be included here as is included under issue 6 above.

Page 2-2. The introductory paragraph under Management Alternatives discusses the moral and social aspect of grazing on public lands. We would like to see a similar adjacent paragraph discussing similar consideration involving fish and wildlife and their non-consumptive and consumptive uses. The emotional value of these resources to consumers who expend monies and limited vacation time deserves recognition. The economics of these uses should also be developed. This should also include economics of business dependent upon these users (sporting goods, motels, restaurants, service stations, taxidermists, etc., etc).

36

Regardless of BLM's opinion as to the "impracticality" of a no grazing alternative because of impacts on ranchers, such an alternative deserves complete treatment in the draft HMP/EIS. In considering only wildlife values, all alternatives presented except the Resource Protection alternative are "impractical" because of impacts to wildlife, recreation, etc. A thorough and accurate presentation is needed of the economic gains realized through increased hunting, fishing, camping, boating, etc., if no grazing were allowed. A no-grazing alternative is routinely considered in HMPs and/or Grazing EIS; and we seriously question the validity of the Wells HMP/EIS unless such an alternative is presented and considered.

Page 2-22, Issue 1: The disposal of 93,150 acres primarily through sale would certainly preclude multiple use aspects. We recommend consideration of figures in the range of the Resource Protection Alternative. Also, we recommend that land exchange be the primary approach with wildlife habitat values and human use thereof being one of the deciding factors.

Comment Letter 20

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Page 2-11, 2-15, 2-20, 2-24. Issue 9. What is meant by "result in a minimum improvement of 30% of its condition within the short term"? We do not understand how habitat can be improved some "percentage of its condition", if condition refers to poor, fair, good, or excellent. Is the BLM stating that it will improve 30% of the indicated riparian habitat (e.g., 26.2 miles) a minimum of one condition class?

Page 3-12. Threatened, Endangered, and Sensitive Species. No mention is made of the Mary's River Aquatic Habitat Management Plan (Mary's River HMP) and its management implication for Lahontan Cutthroat trout. This is crucial because the Lahontan Cutthroat Trout Fishery Management Plan for the Humboldt River Drainage Basin specifies that agency (e.g., BLM) land management planning processes (e.g., HMPs) will be the mechanism for management of riparian and stream habitats. This plan has been approved and signed by the Director of the Nevada Department of Wildlife and is being reviewed for signature by the Regional Director, U.S. Fish and Wildlife Service; Regional Forester, U.S. Forest Service; and State Director, Bureau of Land Management. Once signed, this management plan commits each of the agencies to implement the management actions specified in the plan. Delisting of the Lahontan Cutthroat trout in the Humboldt River Basin would then be initiated by the U.S. Fish and Wildlife Service. It is important for the BLM to realize that the Humboldt River Drainage Basin management plan for Lahontan Cutthroat trout is one component of the Lahontan Cutthroat Trout Recovery Plan, as required under Section 4 of the Endangered Species Act. Approval of the Humboldt River plan by the four agencies involved is a major commitment of those agencies to undertake specific management actions so that delisting of the Lahontan Cutthroat trout may be initiated. Failure of the Wells RMP to satisfy these proposed actions would violate the intent and purpose of the Endangered Species Act. In this context, BLM should be aware of the following objectives stated in the Humboldt River Drainage Lahontan Cutthroat Trout Management Plan:

38

- 1) Stream riparian quality will not be allowed to decline below present condition class levels.
- 2) One-third of the stream riparian and habitat conditions will be improved one condition class within the first 10 year period.
- 3) Land management plans within the Lahontan Cutthroat trout planning areas will receive funding priorities for program implementation when funds are available.

Furthermore, the Humboldt River Drainage plan specifies the following management priorities in the Mary's River subbasin:

- 1) Riparian habitat and stream quality improvement through HMP and AMP planning
- 2) Completion of fish population surveys

4-55

38

- 3) Instream improvements in Mary's River through boulder placement
- 4) Completion of the stream survey on south end.

BLM should therefore insure that management plans for riparian and stream habitats meet criteria specified in the Humboldt River Fishery Management Plan.

In the context of the #1 and #2 objectives for the entire Humboldt River Basin, none of the alternatives appear to meet this objective. As pointed out previously, wording of management actions under Issue 9 in each Alternative is confusing and we suggest they be rewritten.

- Page 2-24, Issue 8: Under Short and Long-Term Management Actions, No. 2, we recommend that you implement adjustments in livestock seasons and numbers as necessary to support multiple use objectives, including wildlife on all habitats.
- Page 2-24, Issue 9: It is recommended that the entire 161 miles (p. 3-12) of Riparian/Stream Habitat in less than good condition receive upgrading to good condition within the 20 year long-term Management Action. Again, the Humboldt River Basin Lahontan Cutthroat Trout Management Plan specifies that one-third of riparian habitats will be improved one condition class in the first 10 years.
- Page 2-31. Standard Operating Procedures. FWS supports the listed procedures and recommends their continued implementation in BLM actions.
- Page 3-9 Threatened, Endangered, and Sensitive Species. Does the BLM have management plans proposed for the known roosting areas for Bald Eagles? Are there any proposed plans for possible reintroduction (with NDOW assistance) of peregrine falcons into known historic habitat (Salt Lake ACEC)? Four bird species (Ferruginous hawk, Swainson's hawk, Long-billed curlew, and White-faced ibis) are considered candidate species by FWS. Information indicates that these species warrant consideration under the Endangered Species Act, pending additional data. FWS would like to see effects of possible alternative actions on these species addressed in the RMP/EIS. Consideration of these actions on candidate species may help to insure that future listing of those species will not be necessary.
- Page 3-12 Redband trout and Relict dace are both candidate species for listing under the Endangered Species Act. Does the BLM have any management plans for these two species? As with above-mentioned birds, present consideration of these species and their habitats may help prevent future listing.
- Page A5-9 Reliance on only 35 "key members of the local economy" for interviews to determine information on social values and public attitudes is highly questionable in our opinion. Were an equal number of hunting/fishing/wilderness/camping/etc. representatives included along with ranching/mining/banking/development, etc. interests?

2

Page A5-10 On Table A5-3 we question the omission of user days for upland game and waterfowl. Since this EIS covers a 20-year period, average conditions should serve as a guide. We believe that the Resource Protection and other alternatives should produce substantial gains in these areas over the 20-year period of analysis. We recommend the inclusion of user days in these areas. Is this table representative over the 20-year period of analysis?

Please explain the 175 user days identified for deer under the Resource Protection analysis.

Please explain how the Resource Protection alternative will support 2,000 less days of camping than the Resource Production alternative.

Are the basic figures for hunting and fishing consistent with Nevada Department of Wildlife figures and projections for these activities?

2

Page A5-11 Table A5-4. Is the listed source correct for derivation of this table? BLM 1982b, according to References, is an unpublished report on range condition and trends. Where were the data for Table A-5-4 derived? How does Table A5-4 relate to the user days presented in Table A5-3 in terms of a dollar value for each type of user day, and an average value for all types combined.

Page A5-11 Is Table A5-4 a complete analysis of expenditures generated through activities identified in Table A5-3? A large proportion of such expenditures frequently occur beyond the immediate area of analysis and are normally considered essential for a thorough analysis.

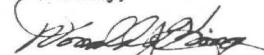
Does Table A5-4 include consideration of intangible values to the identified users?

Does Table A5-4 represent the 20-year period of analysis?

We recommend creation of another table which may be used in conjunction with Summary Table S-2 on page S-4.

If you have any questions concerning these comments, additional input can be provided in an effort to adequately address the wildlife values of the Wells Resource Area.

Sincerely,


Donald J. King
Complex Manager

Comment Letter 21

August 15, 1983

Dear Mr. Harris,

I approve of the Nevada Grazing Board's alternative grazing plan.

Yours Truly,

James K. Wilson

Comment Letter 22

*Clower Valley
Wells, Nev. 89835
Aug. 16, 1983*

*Mr. Rodney Harris
Bureau of Land Management
Elko, Nev. 89801*

Dear Mr. Harris,

Regarding the Wells Resource Management Plan, I endorse the alternative proposed by the Nevada Grazing Board for District 11-4 as the best and most workable approach to resource management in the Wells Resource Area.

Sincerely,

Vern L. Sorenson

Comment Letter 23

Comment Letter 24

4-58

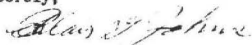
Elair G. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835
August 17, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

In my letter to you of August 14, 1983 concerning the Wells Resource Management Plan I made a mathematical error in stating that your proposed cut in my grazing preference would be 63.9%. It should have read 55.9% cut based on the three-year average use.

Sincerely,



BGJ:j

Carol M. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835
August 17, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

I am involved with my father in ranching in Clover Valley. As a user of the Chase Springs and Tobar Allotment area I endorse the Sixth Alternative to the Wells Environmental Statement for the Wells Resource Area Management Plan as developed by the grazing board. Please use this to develop a cooperative atmosphere of all those factions which use the Federal lands.

Sincerely,





U X LIVESTOCK COMPANY

8/15/83

RUBY VALLEY, NEVADA

Mr. Rod Harris
 District Manager, Bureau of Land Management
 Elko, Nv 89801

Mr. Harris

In reviewing the Draft Wells Resource Management Plan and Environmental Impact Statement, we find several plans that leave us with concern.

5

1. We question the wisdom of the stocking rate based on a 3-5 year period. Since we were off one piece of our BLM during this period because of a range fire, you can see this is hardly fair to our operation.

2. We feel strongly that no fencing should be done along the streambottoms to keep livestock and wildlife away from this forage and shelter. I realize the problem of keeping the stream bottoms from showing heavy wear from cattle, but the fencing of these areas will cause greater wear and tear along the fence lines and in the water gaps where livestock will be allowed to go to the stream beds. This is also another trap for migrating deer, any fence that will keep livestock back from these prime grazing areas will also trap many deer while trying to go through or over it.

3. We feel the Impact Statement is putting too much emphasis on wildlife, spending too much more on them compared to expenditures on the livestock industry.

18

4. We feel that each allotment should be recategorized, putting more emphasis on ownership and trends and allow people to put in private investments if they so desire with the approval of the BLM.

Because of these listed problems, we urge you to consider the sixth alternate proposal that is sanctioned by the grazing board. We feel this proposal fills our needs and answers the many problems of the use growth on the BLM.

Kindest personal regards,

Elaine McGraw

REGISTERED & COMMERCIAL HEREFORDS

Memo

From
 HAWKS AND SON

*To Wells Resource Mgmt
 in Elko*

*We would like to
 see the sixth alternative
 added to the Wells
 Resource Mgmt Resource
 Management Plan.*

Robert Hawks

BURLEY BUTTE CUSTOM FEEDLOT
 BOX E, BURLEY, IDAHO 83318
 1 - 208 - 678-2844

4-59

SMITH BROS. OX RANCH
RUBY VALLEY, NEVADA 89833
702-779-2293

Aug.12, 1983

Mr. Rod Harris
Bureau of Land Management
2002 Idaho St.
Elko, Nevada

Dear Mr. Harris:

In the matter of the Wells RMP and EIS, we wish to go on record to state the following:

39

1. We prefer the Stewardship Program as recommended by Mr. James Watt, Secretary of the Interior, and the Burford. The Wells Resource Management Plan and EIS has failed to address the Stewardship Program which we feel could be implemented by all the ranchers operating here in Ruby Valley as well as most of the other ranches in the Wells Resource Area. It is obvious that if your sanction was given and you personally encouraged this program it would be far superior to the Preferred alternative promoted by the Wells Unit Manager because of the following reasons:

A. There would be a real incentive for the ranchers to put their funds into necessary re-vegetation, water, fencing and other projects which would greatly help to increase the habitat of wildlife as well as forage for livestock. These funds produced by the rancher, his equipment use, and hours of labor would many times exceed the acres and funds proposed by the Preferred Alternative Table 2 - 5

B. The ranchers would have reason to be really involved in the management of their allotments where they could see and benefit from their efforts.

C. The oral hearing held in the Wells High School proved to me there are many potential Stewards more capable to carry out this great program than the individuals who will try to improve the forage in the Wells Resource Area by using only the Preferred Alternative program.

D. The Nevada Grazing Board has concurred with our desire to have the Stewardship program implemented by stating under the heading of Issue 6, Long Term Management Action, "-----This will also facilitate private investment and provide a more uniform distribution of federal funds". We might add, the grazing funds returned to the Grazing Board could be put to a wiser and more equitable use under this better program.

E. There would be a much improved relationship between the BLM and Rancher.

F. We are aware of the fact that the Preferred Alternative is not in the interest of the livestock producer and will not benefit the other users of the Wells RA or wildlife as much as a full fledged Stewardship Program.

G. The Wells RMP has not addressed the Stewardship Program and therefore is not carrying out a program fully backed by Mr Watt and Mr Burford. We would like to know why the RMP doesn't mention the Stewardship Program so that this matter can be brought to the attention of Mr. Burford.

2. We want to register our complaint that the Wells RMP and EIS is in direct violation of the laws of the State of Nevada.

3. Any change of existing laws except by the congress of the U.S. is unconstitutional.

4. We feel there are many good points in the Nevada Grazing Board N I Alternative

submitted to you. However, we do not wish to fully endorse it as we can see where someone could twist it in such a manner as to use it against us like the so-called great multiple use program that was forced upon us over 20 years ago and then it was removed in such a way that the Preferred Alternative makes the rancher look like a breachy cow that needs to be taken to task.

5. The Preferred Alternative attempts to take from the ranches, their vested grazing rights that were created and "cemented" during the past 120 years of use. These ranches, during this period of use, created a "demand" the same as the "demand" when someone homesteaded a parcel of land. This Alternative fails to acknowledge grazing rights established during the priority years and adjudicated since then thus making these grazing rights a very tangible item.

6. "Livestock grazing is a valid use of the public lands as determined by law." Found on page 2 - 2 of the RMP

Sincerely,

Bert N. Smith
Smith Bros. O X Ranch
Bert N. Smith

09-4

Comment Letter 28

SMITH BROS. OX RANCH
RUBY VALLEY, NEVADA 89833
702-779-2293

Aug. 12, 1983

Mr. Rod Harris
Bureau of Land Management
2002 Idaho St.
Elko, Nevada

Dear Mr. Harris:

I would like to state my own personal feelings and protest in regards to the Wells RMP and EIS.

1. I concur with the statements we have stated in the comments we expressed in our Smith Bros O X Ranch letter. I feel the Stewardship program is the most positive and beneficial way to meet the demands of all users of the allotments we use.

2. The oral testimony given in Wells was sincere and mostly positive. These men would be some of the Ranchers in the Wells RA who could make a great success of the Stewardship Program.

3. I feel the N D O W should enter into the Stewardship Program by also furnishing funds and labor if they are to have a voice in the improving and management of the Wells RA.

4. The Wells RMP does not set a specific number for Wildlife on the Wells RA. The NDOW must set a definite Maximum number of large Animal (deer, antelope and ect) that will graze each area of the Wells RA, the same as the number of livestock AUMS have been set. I feel the numbers of deer, antelope and ect that are presently grazing in the Wells RA, are completely without any reason. The progenators of the antelope on our allotment were transplanted from another state following World War II. Where these antelope do not meet the requirements and criteria of the priority years of 1929 to June 1974, they are in trespass and must be removed from the Wells RA. The Ramp states these should be over 17,000 antelope on the Wells RA, also the deer herds have become so excessive that they are spending a large part of the Spring on our private land, and adjacent ELM lands. I challenge anyone to document the fact that such large herds existed in the Wells RA during, prior, or even after the priority years.

5. The RMP tries to document by showing circled areas on a map where crucial kidding areas exist. Are we expected to believe such trite? Who and when were such observations made? I demand proof be shown that this document is valid.

6. It is a fact that there are numerous NA's found in the tables of the RMP under the Ruby/Wood Hills heading. Where this is so, how can anyone make a decision one way or another unless the information or study is complete? Don't you agree that the Wells RMP and EIS must be shelved until all studies are complete and all information is available.

7. Our allotment proves Treatment 3 is superior to Treatments 1 and 2 Page 2 - 29.

8. I feel page 2 - 30 contains comments about Climatic Data that should be changed. The rain fall in Ruby is greatly varied thru out the valley as I imagine it is thru out the Wells RA.

9. I feel there are some Bureau personnel who could have a field day with the N 1 Grazing Boards Alternative Issue. I bet they could really twist that to their liking.

Comment Letter 28

10. I challenge the title of Preferred given to the Alternative proposed by the Unit manager. I also challenge and condemn the action of someone giving the title of No-Action to one Alternative. How big's can you get? I suppose that person should be given some credit. They didn't call it the Least Preferred or No-good Alternative. The RMP didn't speak very highly of it and gave it it's least attention. I feel that because of this attitude that we were in limbo. No-Action casts a bad reflection upon the past actions and efforts, during the past decades, of the ELM, ranchers and NDOW. We do not feel these three groups are deserving of this bad light. Our Ruby 7 is rated 8 "Ms".

11. I feel that TABLE 4 - 7 is very efficient in waving a red flag in m^{rs} face. Who is the educated genius who made up the Tables? What facts and studies did that person or group^s to show that there was absolutely no good wildlife Habitat.

12. After reading the RMP's thought on what is going to happen to the economic and social values of the now so-called permittees (who should really be licensees), and their families and to think of losing such of their life's sweat and efforts, page 2 - 2, 4 - 51 & 52 makes one wonder if strong action be taken to correct this injustice. I was wondering if those responsible for the Wells RMP realize that Nevada is no longer a colony or territory but a state, with state rights over it's own domain?

13. Meat and fiber production will greatly be curtailed if the preferred alternative goes into effect.

14. The Wells RMP fails to address the subject of how much water, forage and salt is furnished to wildlife in the Wells RA by the rancher who pays for and performs the labor whereby wildlife benefits by getting these items free.

15. Specific range management practices such as spraying and ect has not been addressed.

Sincerely,


Paul W. Smith

39

19-4

Comment Letter 29



RICHARD H. BRYAN
GOVERNOR

STATE OF NEVADA
STATE OFFICE OF COMMUNITY SERVICES
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710
TELEPHONE (702) 885-4420

August 12, 1983

LINDA A. RYAN
DIRECTOR

88-17

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

Re: SAI NV No. 83300086 Project: Draft Wells Resource
Area MP/EIS, 1792
(NV-010)

Dear Mr. Spang:

Attached are the comments from the UNR-Bureau of Mines,
Nevada Department of Wildlife, and Division of Environmental
Protection concerning the above referenced project.

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

Sincerely,

John B. Walker
John B. Walker FOR

Linda A. Ryan
Director

LAR:JBW/aa

Enclosure

Comment Letter 29

FEDERAL IMPACT
REVIEW PROGRAM

OFFICES OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

<input type="checkbox"/> Governor's Office	<input type="checkbox"/> Labor Commission	<input type="checkbox"/> Conservation and Natural Resources
<input type="checkbox"/> Attorney General	<input checked="" type="checkbox"/> Legislative Counsel Bureau	<input type="checkbox"/> State Lands
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<input type="checkbox"/> Indian Commission	<input type="checkbox"/> _____	

FROM: Linda A. Ryan, Director

SAI NV # 83300086

PROJECT: Wells Resource Area, RMP - EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

- 1) the program's effect on your plans and programs;
- 2) the importance of its contribution to State and/or areawide goals and objectives;
- 3) its accord with any applicable law, order or regulation with which you are familiar and/or
- 4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [REDACTED]. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

<input type="checkbox"/> No comment on this project	<input type="checkbox"/> Conference desired (see below)
<input type="checkbox"/> Proposal supported as written	<input checked="" type="checkbox"/> Conditional support (outlined below)
<input type="checkbox"/> Additional information (see below)	<input type="checkbox"/> Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

In the section on minerals (p93-15), Barite and gold should be included on the list of minerals. The terms "strategic" and "critical" should not be used in an evaluation such as this. While gold and barite may not be on the Govt. list of strategic and critical commodities, they are economically very important and occur (barite) or may occur (gold) within the Wells Resource area.

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J. V. Tandy
Reviewer's Signature

Geologist, USMB
Title

784-6691
Phone

7/8/83
Date

Comment Letter 29



Nevada
Department of
Wildlife

WILLIAM A. MOLINI
DIRECTOR



RICHARD H. BRYAN
GOVERNOR

1100 VALLEY ROAD P.O. BOX 10678 RENO, NEVADA 89520-0022 TELEPHONE (702) 784-6214

July 5, 1983

Ms. Linda Ryan
Director
Offices of Community Services
1100 East William, Suite 109
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and comment on the draft Wells Resource Management Plan and Environmental Impact Statement which was prepared by the Elko District of the Bureau of Land Management (SAI NV #83300086). The EIS does present a detailed evaluation of planning issues and criteria, alternatives, affected environment, and environmental consequences. We further believe the document presents some very good assessments of current conditions for wildlife habitat and appreciate the Bureau's efforts to present this information in a straightforward and unbiased manner. Those portions of the text relative to riparian condition were particularly well presented and provide strong commitments toward resolving conflicts at degraded sites.

The Department does recognize the Bureau's mandate to manage all resource values under the multiple use concept and therefore the reasoning behind the selection of the preferred alternative. We naturally would support the Resource Protection Alternative as it outlines the strongest commitments for wildlife. We see no reason to oppose the overall concept of the Preferred Alternative since it appears to reasonably satisfy or address problems and concerns for many issues. The concerns we have relative to the preferred alternative include the following:

We question whether the I category allotments can accommodate 35,000 acres of seedings, 27,000 acres of burns, and 1,500 acres of spray w/o seeding and not seriously jeopardize a significant amount of wildlife habitat. A total of 63,500 acres out of a total of 4.3 million acres in the Resource Area does not appear to be very significant. However, when considering the past cumulative effects of vegetal conversion and the large percentage of area physically unsuitable for conversion, it places the proposal in a different perspective. It is also stated that "any loss of wildlife or fisheries resources over the short or long-term from range seedings, livestock grazing practices, or land disposal actions and subsequent development would be irretrievable.

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Also, it is unclear whether the total acreage is a firm commitment or can be substantially modified based on soils, climate, and wildlife concerns. With 3,523,000 (82%) of the resource under neither AMP's or any grazing system it would appear that significant gains in overall condition and trend of vegetative resources can be realized merely by the implementation of well designed grazing systems. This alone would appear to significantly reduce the necessity for large scale vegetative conversions. It is stated in the EIS that "on areas under AMP's and grazing systems designed to allow for periodic food storage, seed production, and seedling establishment of desirable plants, ecologic condition improves relatively quickly." We would recommend that the preferred alternative address goals for numbers of AMP's to be completed in a given time frame.

We would suggest that the top priority for wildlife would be to insure that wildlife receives equal consideration with all resource values in all land management actions and decisions. We feel that the broadest spectrum of wildlife benefits will be realized from the integration of wildlife needs and conflicts in projects and planning not specifically designed as wildlife projects. Since grazing management plans include virtually all wildlife habitats, firm commitments and decisions which will insure the protection or enhancement of wildlife habitat will benefit wildlife on a broad scale. This should not imply that specific "wildlife projects" have not or will not provide substantial benefits. However, funding levels for implementation and/or maintenance of such projects will probably never meet the identified needs. If wildlife needs are an integral part and given full consideration, based on identified values and requirements, in all AMP's and grazing systems then broad scale benefits will be realized.

The following section will be comments or questions to specific sections in the EIS:

PAGE 1-4, ISSUE 2: 1, d

Establishment of designated corridors should not adversely impact key or critical wildlife habitats in addition to lands with wilderness potential, ACEC's, and/or T & E species habitat.

PAGE 1-7, ISSUE 6: 1, a

Planning criteria should stipulate that all water developments maintain an adequate supply of water as the source for wildlife needs and the maintenance of all existing riparian or mesic vegetation.

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PAGE 1-7, ISSUE 6: 3, b

Constraints should also include a thorough evaluation and consideration for wildlife needs. We would recommend that mechanical, with the exception of plowing, means of brush removal be given equal consideration with spray or fire in any vegetal conversion proposal. Often the total removal of all native browse species can cause adverse impacts to wildlife. Mechanical removal methods can often be designed to leave a desirable amount of native browse species and cause minimal impacts to forbs.

PAGE 1-7, ISSUE 6: 4

When computing cost/benefit ratios, would adverse impacts on wildlife habitat be added to the cost in the analysis?

PAGE 1-8, ISSUE 8: 3

Planning criteria should include the establishment and enhancement of a wide variety of browse species, which could include sagebrush, mahogany, serviceberry, cliffrose, 4-wing saltbrush, and not just be limited to bitterbrush. Grazing management should also be considered as a means to enhance the overall condition and trend of desirable browse species.

PAGE 1-8, ISSUE 9: 2

We thoroughly agree with the planning criteria commitment to manage and/or rehabilitate wetland and riparian areas to improve them, or maintain them in at least a good condition class.

PAGE 1-8, ISSUE 9: 3

Special management considerations should also be given to riparian areas with valuable habitat needs for any species, not just for T & E and/or protected species, and sport fishing.

CHAPTER 2 ALTERNATIVES

All RCA's should state there are conflicts occurring between wildlife and livestock grazing. Specific conflicts which should be identified for individual areas include the following:

PAGE 2-1, SPRUCE/GOSHUTES RCA

We would recommend that the maintenance and enhancement of key deer winter range be included as a primary conflict in this RCA.

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PAGE 2-2, PILOT/CRITTENDEN RCA

Pilot Peak provides habitat and supports a limited population of Lahontan cutthroat trout. The need for habitat protection should be identified. Conflicts also occur with the elk herd in the area.

PAGE 2-2, RUBY/WOOD HILLS RCA

Wildlife conflicts in this area should include relict dace, mule deer, and antelope.

PAGE 2-2, MANAGEMENT ALTERNATIVES

The management classification (D, R/C, R/M) is rather confusing and particularly vague where it outlines those areas designated for disposal. The disposal areas (map 2-7), in most cases, are extremely large with no given evaluation of why they were so designated. Many areas within the disposal designation contain very valuable public resource uses and should be evaluated further before being given a broad brush disposal classification.

We presume that no specific management actions will be analyzed for the R/C areas means that no land exchanges will be considered. This is not clearly defined in the narrative. We would suggest that many areas in the R/C areas could be consolidated into public ownership to protect valuable resource values. We feel that specific management actions should be considered in the R/C areas.

CHAPTER 2 PREFERRED ALTERNATIVE

PAGE 2-22, ISSUE 1: LANDS

The disposal of 93,150 acres could jeopardize a number of valuable resource values. The midrange or resource protection alternative where 18,065 or 10,385 acres were identified for disposal would be a better choice. We would recommend a very cautious approach to disposal until detailed evaluation has shown that these lands do not provide valuable natural resources.

Land disposal south of Montello (Tecoma or Pilot Valley), although much of this area is checkerboard, a growing antelope population exists. Disposal to the private sector could decrease wildlife values. Elk sometimes winter at low elevations on both private and public land. Development of this remote area could also decrease wildlife values. The disposal of lands immediately around Wells, Montello and Wendover are not a major problem.

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PAGE 2-23, ISSUE 5: WILDERNESS

We would favor the identified wilderness in the preferred alternative as being preliminarily suitable for wilderness designation.

PAGE 2-23, ISSUE 6: LIVESTOCK GRAZING, 3

We wholly support the development of AMP's and grazing systems on allotments. We would hope that such systems would be implemented for all category allotments.

PAGE 2-24, ISSUE 8: TERRESTRIAL WILDLIFE HABITAT

Livestock adjustments should be implemented, not just considered, to improve or maintain essential or crucial wildlife habitats. Also numbers, not just season of use, may have to be adjusted. It would be desirable to set a specific level at which these habitats would be maintained at or improved to. We would suggest that the level be set at least at good or better condition.

What is the definition of essential habitat? Our definition of essential would cover a very broad range of habitat needs for all wildlife species.

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We would suggest that the improvement of 5,000 acres of crucial big game habitat be accomplished by a variety of management methods, not just by chain or burn. In some areas a very restrictive livestock grazing system may accomplish identified goals.

A high priority management action for wildlife should include the complete integration of wildlife needs into any grazing system.

PAGE 2-24, ISSUE 8: 5

41

Chain or burn and seed 5,500 acres to improve crucial big game habitat should be considered carefully. Vegetative manipulation on winter ranges is a risky proposition at best. Seeding browse would be beneficial, but livestock removal is a must until "ID" team agrees that plant phenology could handle livestock use.

PAGE 2-25, ISSUE 10: WOODLAND PRODUCTS, 4

The recommendation to harvest 75 percent canopy cover removal of woodland products on 50,000 acres of crucial deer winter habitat should be site specific. Thermal cover is essential for winter survival of mule deer.

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PAGE 2-25, ISSUE 10: 6

To successfully rejuvenate deteriorated aspen stands will require some long-term management commitments, such as elimination of grazing for a period of years till sprouts are established. Merely burning and cutting in itself will not be successful. We also seriously question whether there is sufficient aspen in the Resource Area to even support any level of harvest program.

Proper use levels for livestock should be established for key browse species on all key or critical big game winter ranges. Proper livestock utilization on these species will assure that ample forage remains for big game.

PAGE 2-30 MONITORING

2

We would consider 45% utilization of shrubs by livestock on key winter ranges to be excessive. The utilization level should be held to 25-30% or less in these areas.

PAGE 2-32

The incorporation of the Western State's Sage Grouse Guidelines into the Standard Operating Procedures is a very positive accomplishment. We also view Standard Operating Procedures numbers 22 through 30 as having positive aspects for wildlife.

CHAPTER 3 AFFECTED ENVIRONMENT

PAGE 3-9, BIG GAME POPULATIONS AND HABITAT CONDITIONS

Maps 3-5 and 3-6 should be updated from additional information which is available at our Elko office. We are particularly concerned that the potential reintroduction sites for antelope and bighorn sheep are not adequately identified on these maps.

PAGE 3-11, HABITAT CONFLICTS

It should also be identified that conflicts with livestock and riparian areas include the excessive removal of mesic vegetation associated with the site. Long term excessive use will result in elimination of desirable mesic species and/or invasion by less desirable species. Excessive removal of mesic vegetation can also initiate or accelerate erosion.

There are numerous habitat conflicts not associated with terrestrial or stream riparian sites throughout the RA. These conflicts should be discussed in the narrative.

Ms. Linda Ryan
 July 5, 1983
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PAGE 3-14, SIGNIFICANT HABITAT CONFLICTS

We totally support the statement, "in most cases, livestock grazing was primarily responsible for producing and maintaining deteriorated aquatic/riparian habitat conditions". It is also stated that contemporary riparian studies within the Wells RA support this finding. It probably would add emphasis and support to the statement if some specific results or findings of Deer Creek or other studies were included in the EIS.

PAGE 3-23, LIVESTOCK GRAZING

2

If all the ranchers interviewed "said that they would not run more cattle on their BLM allotments, even if they were allowed to", why propose a 1.7% increase in AUMs over the three to five year licensed use, as stated in the preferred alternative. We find the statement a little incredulous when considering local attitudes.

PAGE 3-24, WILDLIFE HABITAT

What is really gained in the EIS when statements such as "most interviewers did not think cattle competed for forage with other big game such as deer or antelope"; "seedings are beneficial to wildlife"; and "cattle do not create that much of a problem on good fishing streams because they usually cannot penetrate the willows and brush" are presented. We feel the EIS should present only documented facts and not wild conjecture.

PAGE 3-30, VEGETATION - THREATENED, ENDANGERED, AND SENSITIVE SPECIES

2

The statement that "the complete removal of even one plant from any of these populations would be detrimental" seems completely in opposition to the statement "grazing does not seem to have a harmful effect on any of the known populations of these species".

CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

PAGE 4-2

It would seem reasonable that lands suitable for agricultural development be allowed not only under the constraints of water availability, but also under the constraints to protect or preserve all valuable resource values as they presently exist on those lands.

PAGE 4-5, ISSUE 8: TERRESTRIAL WILDLIFE HABITAT, 2

We would suggest that the change in one condition class be based on 10% of the acreage. This would make wildlife consistent with livestock in the percentage for condition class change.

Ms. Linda Ryan
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PAGE 4-5, ISSUE 8: 4 & 5

We would request that the fair condition be changed to good in number four and poor condition be changed to fair to signify significant beneficial or adverse impacts.

PAGE 4-55, ISSUE 8: 6

We question whether the Ruby/Wood Hills and Metropolis RCAs can support grazing at preference levels without resource damage. Preference levels would entail stocking rates which are 8% above current levels. If the increase will rely totally on established crested wheat seedings then probably little conflict would occur.

APPENDICES

PAGE A3-2 APPENDIX TABLE A3-1

Reasonable numbers for deer as presented in Appendix Table A3-1 appear to be incorrect or the table may be titled improperly. This table should be reviewed and possibly revised using information available at our Elko office.

3

It is also rather difficult to interpret the reasonable numbers because the RCAs combine areas different than our herd management units. The Department has calculated reasonable numbers on herd management areas. We do question the existing number of 30 antelope in the Ruby/Wood Hills RCA. Present numbers probably surpass the 60 given as a reasonable number. A reasonable number of 200 would represent a goal level for this RCA.

We also seriously question the existing number of elk listed for the Spruce/Goshute RCA. Existing elk in this area are probably only transient animals.

A 5-10 TABLE A5-3 WILDLIFE REC. DAYS WRA

82

The preferred alternative will decrease current use levels of fishing (both stream and reservoir) by 30% and 15% respectively? Fishing use days are predicted to decrease under all alternatives, even the no action alternative. Either we do not understand the table or it is not accurate. We do not believe angler days will decrease in the WRA.

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Comment Letter 29

Ms. Linda Ryan
July 5, 1983
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We basically find the RMP and EIS a well written document which addresses the ramifications of most important issues within the Wells Resource Area. Hopefully the BLM planning staff will find the above listed comments useful in developing a final plan which addresses all wildlife concerns. If you have any questions on this matter or feel a need for further input at this time, please advise.

Sincerely,

Willie

William A. Molini
Director

JW:RPM:cb

cc: Region III

Comment Letter 29

FEDERAL IMPACT
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OFFICES OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
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<input type="checkbox"/> Education	<input type="checkbox"/> UNR-Renewable Natural	<input type="checkbox"/> & Archeology
<input type="checkbox"/> Employment Security Department	<input type="checkbox"/> Resources	<input checked="" type="checkbox"/> State Parks
<input type="checkbox"/> Energy	<input checked="" type="checkbox"/> Wildlife	<input checked="" type="checkbox"/> Water Planning
<input type="checkbox"/> Equal Rights Commission		<input type="checkbox"/> Water Resources
<input type="checkbox"/> Human Resources		<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Indian Commission		

FROM: Linda A. Ryan, Director

SAI NY # 83300086

PROJECT: Wells Resource Area, RMP - EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

- 1) the program's effect on your plans and programs;
- 2) the importance of its contribution to State and/or areawide goals and objectives;
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PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [redacted] Write out your comments if applicable, check the appropriate box and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

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<input type="checkbox"/> Additional information (see below)	<input type="checkbox"/> Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

AIR-Dick Serdoz: This area has some existing permitted sources of Air Pollution. The area has been identified as having at least two potential power plant locations, along with a lime kiln depending on the economics in the near future. The area had been used for mineral extraction which are not in operation at the present time. These potential conflicts were not identified nor were mitigation addressed.

WATER-Allen Biaggi: The Nevada Division of Env. Prot. recognizes the deteriorating condition of riparian areas within the resources study area. The Division strongly supports those alternative actions which will most improve and protect the resource values in these areas. The Division permits a number of municipal discharges, through the N.P.D.E.S. system, into waters in the resource area. Impacts of these discharges, if any, on the values present are not addressed.

SOLID WASTE See attached page.

L. H. Hodgson/Kay Administrator
Reviewer's Signature Title

885-4670 5/23/83
Phone Date

Comment Letter 29

Comment Letter 30

Clearinghouse Comments. #83300086, Wells Resource Area, RMP - EIS

Solid Waste-Doug Martin: Several towns in the resource area have existing R&PP leases for solid waste disposal sites yet there is no mention of this or other solid waste issues, for example, the BLM campground at Ruby Marsh is a major generator of solid waste, what impact does this generation have on the local landfill and what does BLM plan doing if they expand or close the campground?

89-4

RICHARD H. BRYAN
Governor

STATE OF NEVADA

ROLAND D. WESTERGARD
State Historic Preservation Officer



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY

201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 885-5138

August 17, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
ATTENTION: Wells RMP/EIS Team Leader
P. O. Box 831
Elko, NV 89801

Dear Mr. Harris:

The Division has reviewed the draft of the Wells Resource Management Plan and Environmental Impact Statement. Although there are no properties listed on the National Register of Historic Places within the Wells Resource Area, numerous archeological and historical sites have been discovered, some of which may be eligible to the Register.

BLM proposes to protect significant cultural resources under standard operating procedures which entails compliance with current federal preservation laws and regulations. We encourage the BLM to utilize existing data (such as that found in the Cultural Resources Overview of the District) during planning to identify potential conflicts, for example, between the placement of transmission line corridors and archeologically or historically sensitive areas. We would also recommend a similar approach for proposed land transfers. The more promptly potential conflicts are noted in planning, the more easily they are resolved before plans become formalized.

Native American consultation should be a consideration during the planning of larger projects. Plant and animal gathering areas, burial grounds and sacred sites should be taken into account when making major decisions concerning transmission line corridors and land transfers.

We have no other comments at this time.

Sincerely,

Alice M. Becker
ALICE M. BECKER
Staff Archeologist

AMB/lmw

cc: John Walker, Office of Community Services
Re: 83300086
Ed Spang, State Director, BLM

Comment Letter 31

Natural Resources Defense Council, Inc.

25 KEARNY STREET
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415 421-0561

Washington Office
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SUITE 600
WASHINGTON, D.C. 20006
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NEW YORK, N.Y. 10018
212 919-0019

August 16, 1983

Rodney Harris, District Manager
Attn: RMP/EIS Team Leader
P.O. Box 831
Elko, Nevada 89801

Re: Wells Resource Management Plan/
Environmental Impact Statement

Dear Mr. Harris:

I have reviewed the Wells RMP/EIS and submit these comments on its range management provisions on behalf of the Natural Resources Defense Council, Inc.

The range management sections of the RMP/EIS are inadequate both as a land use plan and as a grazing EIS. The provisions are so vague and generalized that they will not constrain or limit future resource uses and will not provide meaningful guidance for existing or subsequent resource activities, as required by law. See 43 U.S.C. § 1712; 43 C.F.R. §§ 1601.0-5(k) (1983), 4100.0-5 (1982) (definition of "land use plan"). The EIS also lacks the detailed proposals, resource information, and impact analysis required by the National Environmental Policy Act (NEPA). See NRDC v. Morton, 388 F. Supp. 829 (D.D.C. 1974). Given these deficiencies, as detailed below, the draft should be revised and supplemented extensively and circulated for additional public comment. See 40 C.F.R. § 1502.9(a) (1982).

One crucial shortcoming of the RMP/EIS is its failure to analyze specific proposals for range management, even though such proposals are concededly necessary to remedy serious resource problems. EISs must contain proposals and alternatives that include the actual terms and conditions under which grazing will be allowed. Such proposals must include, for each allotment or group of allotments, numbers of livestock, seasons of use, maximum utilization levels, and grazing systems. See NRDC v. Morton, supra; 43 C.F.R. §§ 4120.2, 4120.2-1(a) (1982).

Although the proposals and alternatives in the EIS include grazing levels, they lack all the other elements necessary to make a reasoned choice among alternatives. The Bureau states

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Public Lands Institute: 1720 RACE STREET • DENVER, CO. 80206 • 303 377-9719

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August 16, 1983
Page Two

that it will "develop activity plans and grazing systems" under each alternative (EIS, pp. 2-10, 2-14, 2-19, 2-23), but the EIS fails to identify any such specific plans or systems. Even under the "no action" alternative, existing AMPs and grazing systems are mentioned but not described. (p. 3-7.) Similarly, wildlife objectives are set forth in terms like "improve" or "identify" crucial habitat, but no specific "techniques" for attaining these goals are identified. (E.g., pp. 2-11, 2-15.)

The lack of specific proposals is particularly troublesome given the area's serious resource problems. The EIS concedes that approximately 75% of the area is in unsatisfactory range condition and that "improved range management practices and treatment" are needed to remedy this situation (p. 3-25), but fails to identify the needed actions. Similarly, there are few specific proposals to improve riparian and aquatic habitats that have been degraded by livestock. (Tables 3-4, 3-5, p. 3-14.) Likewise, although mule deer and antelope habitat have declined due in part to excessive livestock use (pp. 3-9 to 3-10) the EIS lacks any remedial proposals. Under the circumstances, the proposals and alternatives in the EIS clearly violate the Bureau's duty to "take any action necessary to prevent unnecessary or undue degradation" of the public lands. 43 U.S.C. § 1732(b).

The alternatives in the EIS are also inadequate. The EIS fails to consider any alternative management practices, much less a "full range of management practices," as required by NEPA and the "Final Grazing Management Policy," p. 1-18 (I.M. No. 82-292, March 5, 1982). Although the EIS contains a range of grazing levels, it fails to explain or justify the numbers chosen. Moreover, the Bureau's decision to reject the "no grazing" alternative was erroneous, for the reasons stated in the attached memoranda from BLM officials in Colorado and New Mexico.

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Another fundamental deficiency of the EIS is the absence of essential range and resource condition data. The EIS is wholly lacking in basic range information. Ecological range condition data have not even been gathered. (p. 3-25.) The EIS lacks estimates of current and future grazing capacity, which are essential to prevent overgrazing. The Bureau has long conceded the need for this information, and has included it in most past grazing EISs. Nor does the EIS contain any discussion of specific resource conflicts and problems in particular areas. Without this information, it is impossible for the public or the agency to analyze the impacts of the proposed action or the alternatives.

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Given the absence of specific proposals and baseline information, the EIS's environmental impact analysis is totally unsatisfactory. The analysis is based on unfounded "assumptions" like "proper season of use" (p. 4-3), even though such "proper"

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seasons are never identified. Improvements in condition are predicted (e.g., pp. 4-32 to 4-33) but never explained or justified adequately. The analysis improperly focuses on the adverse economic impacts to permittees of reduced grazing (e.g., Tables S-2, 3-2) while ignoring the adverse environmental impacts to the public lands of existing and proposed grazing. In short, the impact analysis simply assumes that management will be "improved" (e.g., p. 4-33), and predicts environmental benefits based on these hypothetical actions.

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The EIS also fails to analyze the potentially serious adverse effects caused by herbicide treatments. Virtually no information is provided with respect to the types of treatments that will be allowed, the specific areas that will be sprayed, or the need for such treatments. The EIS lacks any analysis of the potential risks to humans and the environment posed by herbicide spraying, including a worst case analysis, as required by NEPA. See, e.g., Save Our Ecosystems v. Watt, Civ. No. 83-6090-E (D. Ore. May 6, 1983); Merrill v. Block, Civ. No. 81-6138-E (D. Ore. April 19, 1983); Southern Oregon Citizens Against Toxic Sprays v. Watt, Civ. No. 79-1098PR (D. Ore. Sept. 9, 1982). The EIS should consider utilizing other techniques of vegetation manipulation, such as burning, as well as the possibility of "no action," or foregoing all such techniques. Without such analysis, neither the Bureau nor the public can determine how much, if any, herbicide spraying should be allowed. Moreover, because the RMP is designed to provide comprehensive guidance for all future management actions, including herbicide spraying, if any, this analysis should be included in the draft RMP/EIS, not in some later document. See, e.g., 40 C.F.R. § 1502.22 (1982).

In conclusion, the range management provisions of the draft Wells RMP/EIS should be completely revised and circulated for additional public comment. As is, the document falls far short of satisfying the requirements of NEPA and the judgment in NRDC v. Morton, and will undoubtedly be ruled inadequate.

Thank you for considering these comments. Feel free to contact us to discuss these issues further.

Sincerely,

David B. Edelson

Enclosures

Comment Letter 31



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Roswell Resource Area
P. O. Drawer 1857
Roswell, New Mexico 88201

IN REPLY REFER TO

1601

RECEIVED

JUL 29 1983

NRDC CALIF.
July 27, 1983

Dear Public Land User:

This letter is to inform you of the addition of Alternative 5 to the West Roswell Management Framework Plan Amendment (MFPA) and Environmental Impact Statement (EIS). Alternative 5 is the "No Grazing Alternative" and will be considered for the following reasons.

Our Final Grazing Management Policy dated 3/5/82 states:

"Alternatives analyzed in the EIS must describe a full range of management practices, including various levels of livestock grazing use. Recommended minimum alternatives are:

- Proposed Action
- No Action
- No Grazing
- Increased livestock grazing use; &
- Decreased livestock grazing use."

As you may recall, at our public meeting in March of this year we made the statement that we did not include the "No Grazing Alternative" because we did not see it as a viable alternative. We still maintain that it is not a viable alternative, however, it must be included.

The reason the policy directs us to include this alternative is to comply with the National Environmental Policy Act and the 1975 U.S. District Court Agreement.

The purpose in including this alternative, even though it may not be viable, is to provide the decision maker the opportunity to study the effects of no grazing. This provides him with information from a broad range of alternative actions and impacts from which he can make comparisons and select the least impacting program for implementation.

In addition, our State Office has also directed us to include this additional alternative for the reasons stated above and because of legal action taken against two recently completed EIS's because they failed to include the "No Grazing Alternative".

If you have any questions concerning this issue, please contact us.

Sincerely yours,

Area Manager
Roswell Resource Area

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Comment Letter 31



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
1037 20th STREET
DENVER CO 80202

US REPLY 8/17/81

CO-933
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AUG 1 1983

NRDC CALIF.

December 16, 1981

Instruction Memorandum No. CO 82-68
Expires 9/30/83

To: District Managers
From: State Director, Colorado

Subject: The "No Grazing" Alternative

Colorado will continue to consider a "No Grazing Alternative" in the remaining EIS's mandated by the NRDC vs. Morton court judgment.

There are two options that can be used, and the District Manager may decide on a local basis which option to use.

1. Display the full development and analysis of the "No Grazing Alternative" in the EIS as we have done in the past.
2. Have the development and analysis of the "No Grazing Alternative" complete as shelf data, available for those who wish to review it. In the EIS on the table of "Summary and Comparison of Impacts," display the impacts for the "No Grazing Alternative." Document in the EIS why this alternative is not fully discussed in the statement and where the "shelf data" are available for review.

There are several reasons for continuing to analyze this alternative.

1. It will provide baseline information against which to measure other alternatives to consider.
2. It does display the socioeconomic impacts at the local and regional level of livestock grazing on public lands.
3. Past agreements with outside groups that a "No Grazing" alternative would be applicable to all grazing EIS's.
4. Maintain consistency in Colorado.

The enclosed issue paper traces the history of the "No Grazing Alternative."

Cecil Roberts

Enclosure

Comment Letter 32

COMMENT ON WELLS RIS/RMP

June 21, 1983

The Resource Production Alternative is misnamed and / or analyzed incorrectly. It would only allow for a 1.2% increase in the preference. This is the first example of the negative thinking in preparing this document.

On page 2-1 this document describes "resource conflict areas." The second major topic of negative thinking. One of the benchmarks of ecology is the symbiotic relationship of plants and animals. For example, the inferred conflict between deer, antelope, and cattle on the same range is more likely to be a complimentary association rather than an antagonistic one. If proper stocking rates and management are applied. Williams et al, 1981, found that deer preferred blue-bunch wheatgrass plants that had been defoliated the previous fall to those that had not. Other studies demonstrate that light grazing of bitterbrush is beneficial to wildlife.

The Resource Production Alternative should be the positive thinking plan and the one I support. However, the plan does not propose maximum production of the range resources for livestock. It is the opinion of many range managers, including agency personnel, that brush control on a crested wheatgrass seeding, for example, may only last 20 years until something needs to be done again whether or not it has been heavily grazed or lightly grazed. Our association has begun a brush control program on our private seedings which were planted about 20 years ago. This document doesn't propose anywhere near the needed maintenance of already existing improvements and seedings.

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The Resource Protection Alternative is unacceptable. The underlying premise is that livestock grazing is always to the detriment of the other resources and simply is not true.

The preferred alternative proposes seeding 10,000 acres and prescribed burning 3,500 acres in the O'Neil/Salmon Falls RCA (Table 2-5.) Although this is the same as proposed in the Resource Production Alternative, the amount of seeding would be about right for our allotment but not enough to spread between all the allotments in this RCA. The amount of burning is about 1/3 of the BLM acreage in the RCA. Fire can be the cheapest brush control tool available. It is well documented that the Juniper woodlands have increased because of man's over-control of wildfires. I am not advocating torching off vast acreages on all types of range sites and habitat types. If misused fire can create serious problems for wildlife, livestock, and the watershed.

The worst conflict with the critical deer winter range was the wild horse concentration occurring up until 1979. The control of the horses from those critical areas in Meadow Creek, the Granite Range and the L and D Mountains has already shown positive results. It's our opinion that with current stocking rates the critical deer ranges will continue to improve. The control of wild horse continuous grazing on riparian areas will also allow for improvement of these areas.

The Sage Hen population is thriving in the pasture north of Gollier Mountain. This area receives early spring use at moderate stocking rates. The area was also sprayed extensively for brush control in the middle 60's.

Their rating of the current management as "unsatisfactory" in the MSA reflects on themselves. The BLM has failed to maintain the ranges by brush control at proper intervals on portions of the range, reseeding defoliating

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ranges with an ineffective chance of natural recovery, maintaining water improvements, and building and maintenance of fences to control livestock. The inconsistencies in the BLM personnel and policies is the underlying problem of most of the failures.

The BLM's appraisal of the range conditions and trend of the Salmon River Allotment is contrary to anyone's opinion who has observed the vegetation over a long period of time.

On page 2-11, Issue 2, the short-term management action states "Improve 805 acres or 26.2 miles of deteriorated high priority riparian/stream habitat using techniques which would result in a minimum improvements of 30 percent of its condition in the short-term." This is highly unlikely! The BLM is overestimating the rate of recovery of the riparian system. There is much we don't know about riparian systems, hydrology, and the effect of livestock grazing. There have been very few properly conducted scientific experiments and observations of grazing effects of riparian areas. Results indicated, in a study by Hayes, 1978, that rest-rotation grazing did not significantly accelerate channel movement and that the occurrence of degradation during spring discharge along ungrazed streambanks was significantly greater than degradation occurring along grazed streambanks.

"Currently 87 percent or about 396 miles of streams are in a deteriorated state. Primarily as a result of livestock grazing...the ongoing decline would continue." (Page 4-11) That is an opinion not a scientific projection.

I agree that the proposed seedings would help solve the problem of spring forage and improve the native range condition on the higher precipitation sites because of longer deferral from grazing. (Resource Production Alternative, page 4-21, Issue 6, paragraph 2.)

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Comment Letter 32

The BLM shouldn't figure yearlings as a full Animal Unit. A yearling doesn't consume 26 lbs. dry matter per day. Holechek and Vavra (1982) determined steers had a mean forage intake level of 2.1% of body weight. Therefore, a 600 lb. steer would consume 12.6 lbs. dry matter per day.

Range managers are concerned about the plants physiological needs and rightly so, but we are ignoring the physiological needs of cattle. Why do cattle concentrate on riparian areas? Bryant (1982), studying response of livestock to riparian zone exclusion, concluded that regardless of aspect both cows with calves and yearlings generally selected the riparian zone over the upland zone throughout most of the summer. But both classes of livestock reversed their selection in favor of upland vegetation in September through October.

He reminds us that ungulates have few mechanisms to control body temperature. Cattle cope with excessive heat in the following ways: (1) increase respiration (2) consume water (3) restrict movements or rate of movements (4) seek more comfortable environmental conditions (5) perspire through relatively insufficient apocrine sweat glands. All of these reduce the metabolic rate.

In this same study, Bryant recorded that the temperature was cooler and humidity higher in the riparian zone during the summer. If we can figure out how to provide shade, water, and palatable forage at intervals away from the riparian zones, we should be able to better distribute livestock on the range and at the same time make them comfortable. If cattle are stressed they will not gain weight properly. Fencing of riparian zones will not solve the problem of livestock comfort or distribution, the cattle will merely concentrate along the fence. This study also found that salt placement did not affect livestock distribution.

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1 Concerning the desire of the BLM to delay the turnout date of the cattle, this may be desirable for plant physiology but would be the economic ruin of our stockholders. Almost all of our cattle are wintered on irrigated farmland up until average turnout date of April 22. It is critical that the cattle be removed from the irrigated farm ground in order to plant crops and pre-irrigate the cropland. In addition, to feed 7,000 head of cattle \$60 a ton hay at 22 pounds per head for one week would cost the Association \$52,340.00. It currently costs more to produce a calf than we can get at the marketplace.

The best opportunity for delaying turnout on native ranges is to seed crested wheatgrass on appropriate sites to accommodate the livestock during this crucial period of native plant growth. We currently are working with the BLM to develop a plan for desirable grazing systems to meet the physiological requirements of the plants.

A BLM letter dated December 15, 1955, lists a ten year permit issued to the Association for 6,500 cattle for eight months and 4,436 sheep for five months (Approximately 56,436 AUM's). In January 1960 and "agreement of understanding", the Association put "4,000 AUM's in suspended non-use until such time that more feed is available either through water developments, management, or artificial revegetation". The document lists our Class I demand at 31,304 AUM's (CFR 4110.0-5 (K)(I)). It also states "The Bureau of Land Management agrees to cooperate with the Salmon River Cattlemen's Association through management and/or revegetation to restore the suspended non-use."

We do agree that the potential for an economic return on investment is high. However, the Association has invested close to one million dollars in labor and materials over a long period of time and have not received

Comment Letter 32

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credit from the BLM. Our only gain from this investment has been a few pounds of beef. Although the improvements we made were the responsible thing to do, it is not economically feasible to subsidize the BLM this way.

There are several sections of sagebrush between the San Jacinto Ranch Headquarters and highway 93 which have not been grazed by livestock for a period of time in excess of 30 years. Yet within the SVIM survey done in 1979 the BLM described it as in poor condition and in a downward trend. I agree with the poor ecological condition status, but I believe the trend is not apparent. Livestock grazing is obviously not the critical factor in the failure of the vegetation to progress toward a climax community or late seral state.

I believe the Grazing Board Alternative is a more positive and workable plan to get the BLM and resource users back in the range management business. If the BLM has the objective of increasing and using resource values, then it will take a commitment of personnel and funds to undertake 'on the ground' improvements.

I thank you for the opportunity to express some facts and observations of the Wells EIS and RMP. I hope you will have an open mind and truly study these comments.

Sincerely,

Glenn E. Shewmaker
Glenn E. Shewmaker

Comment Letter 32

Brvant, Larry D. (1982). Response of Livestock to Riparian Zone Exclusion. *J. Range Manage.* 35:780-786.

Holbrook, Jerry L. and Martin Vavra. 1982. Forage Intake by Cattle on Forest and Grassland Ranges. *J. Range Manage.* 35: 737-741.

Haves, F.A. 1978. Streambank stability and meadow condition in relation to livestock grazing in mountain meadows of central Idaho. M.S. Thesis. Univ. of Idaho, Moscow, ID. 91p.

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Comment Letter 33



QUALITY LIVESTOCK
BOIES RANCHES

WELLS, NEVADA 89835

August 18, 1983



Rodney Harris, District Manager
Elko District-Bureau of Land Management
Elko, Nevada

Dear Sir:

Comments are given in response to the Draft Wells Resource Management Plan and Environmental Impact Statement by the owners and operators of Boies Ranches.

We are equally interested in all the resources in the area of our grazing lands and the resources of the entire Wells Management area.

Twenty years ago this area was part of a pilot program to implement the multiple use concept of management of the public lands. Interest in this project may have diminished with some of the parties involved, but the multiple use concept has always been practiced in this area by the management of Boies Ranches.

In addition to the oral testimony given by Steven Boies at the June 21 1983 hearing held at Wells, Nevada, we would like to recommend the Sixth Alternative proposed by the Nevada Grazing Board for District N-1 be adopted. Please find copy enclosed.

In the interest of all concerns more money must be put into on the ground improvements. The study process has been much too costly in terms of man power and money. We are troubled by the futility of this process and feel it is time for the B.L.M. to move in the direction of constructive implementation. We must be mindful that the environmental values we all feel are so important are not placed in jeopardy.

One study may remain to be done. If each party involved would do a self-evaluation of their individual attitude, progress toward constructive goals would undoubtedly result. Without this effort progress will be impossible.

President Boies Ranches

Marla Friedman

Vice-President Boies Ranches

O. Stan Boies

Comment Letter 34

FLYING "S" LAND & CATTLE COMPANY
BIG SPRINGS RANCH
WELLS, NEVADA 89835

15 August 1983

Rodney Harris
Elko District Manager
Bureau of Land Management
Elko, Nevada

Dear Sir:

These writings will serve as comments upon the "Draft Wells Resource Management Plan and Environmental Impact Statement," prepared by the U.S. Department of the Interior, Bureau of Land Management. They are written by Dick Roth, Ranch Manager, Big Springs Ranch, Flying 'S' Land & Cattle Co., Wells, Nevada, 89835.

"Livestock production is a major industry within the Wells RA" (WRA-RMP/EIS, p 3-21).. "The residents of the resource area perceive the livestock industry to be both socially and economically important to the community...In fact, ninety percent of the persons interviewed for the social analysis mentioned ranching as the number one industry associated with public lands..." (WRA-RMP/EIS, p 3-23).

As ranchers, we are well pleased with the BLM's attempt at a good neighbor policy. However, we are shocked at the antagonism encountered towards us as an industry throughout this document. Many things would lead us to believe that a "good neighbor" is simply "window dressing." What we see here is an end result of the "Preferred Alternative," - reduction of our AUM's to 48.1% of that to which we are now entitled. This, of course, would be economically catastrophic if it were carried through.

It is evident that those in the BLM who prepared this document do not understand the economics of ranching. An attempt to gloss over this inadequacy was rather lamely made on page 3-21: "Within the Wells RA, each ranch has a set of unique characteristics which will cause its operation to differ from those of the 'typical ranch.'" I need mention only two items from pp A5-2 through A5-5 to prove my assertion of lack of understanding.

- 46 | 1) The estimated sales price of cattle said to be the 1978 to 1980 average price is questionable, at best. (One could make a case that it has been wildly inflated.) My best guess is that it averages at least 15% higher than actual prices. This fact alone could vastly affect an assessment of the economic impact of the BLM's proposals.
- 47 | 2) Selling yearling steers and heifers requires feeding those animals through a winter. For ease of figuring, one can assume that each animal will consume one ton of hay per winter, (twenty pounds per day for one hundred days). Add this to one ton of hay

PHONE: ELKO, NEVADA, TOLL STATION BIG SPRINGS RANCH #1

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15 August 1983
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(approximately), per cow and bull in the herd, and one would have 3298 tons of hay to feed as per your example on page A5-5. At a price of \$80. per ton of hay, this would be \$263,840. worth of hay. Assuming that the ranch can produce hay at 85% of market value, we would expect the ranch to have to purchase \$176,840. worth of hay to keep the animals alive that this document maintains that it does. However, this document shows no cost to purchase hay. This is patently ridiculous and shows the total lack of understanding of economics and realities that the BLM has of its "good neighbors."

These are but two of many examples that would obviously wrongly influence the BLM's assessment of the ranchers ability to survive, having his AUM's drastically reduced as you have so blithely proposed to do to our operation and many others in this study. These fictional economic numbers for the "typical" ranch would lead the reader of this document to believe that ranchers are presently "rolling in cash." Of course, as any aware individual knows, the exact opposite is true. In fact, the ranching industry is struggling hard to improve range conditions and stocking rates so that it can conceivably operate at a profit. We don't need the Federal Government to take from us the few chances we may have to succeed. A truly "good neighbor" would help his neighbor to do what he has the ability to do, rather than impose conditions upon him that would force him to vacate his premises.

The BLM has gone on record in this document as "preferring" this alternative, saying that it does not "overly restrict the ability of other resources (i.e. ranching), to provide economic goods and services." It further states that this is "the best management action." (p 2-22.) We, of course, could not disagree more vehemently.

That the BLM does not consider ranching a resource worth protecting is shown further in its "Resource Protection Alternative." I originally thought we were at least considered a "resource" when the authors of this document designated the entire Wells area a "Resource Area," and further when they divided us up into "Resource Conflict Areas." (This term shows the negative attitude inherent in the entire study. A positive outlook could just as easily have chosen the term "Resource Cooperation Area." Surely this would show a more "good neighborly" underlying attitude. Unfortunately, it is more evident that the management of the USDI and the BLM have not effectively instilled even their rhetoric throughout the rank and file of their bureaucracies.) I assumed that we were at least considered a "resource" that was in conflict with others. But even if we are in "conflict" they have chosen not to "protect" us. To quote how the Resource "Protection" Alternative affects ranchers: "Ranchers would be extremely displeased with the AUM reductions in this alternative. Rancher would be severely impacted and some would be put out of business." (p 4-52) This is "protection of a resource?"

I have presented just a small portion of the evidence that the BLM is highly antagonistic towards the ranching community, and would seemingly "prefer" to have ranchers out of business. If their calculations of our economic viability are simple errors, we would expect

15 August 1983
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them to be corrected and their preferred alternative to be adjusted accordingly. If, in fact, the errors are deliberate attempts to mislead the decision-making process, we expect them to remain in place. We will, of course, be forced in that case to bring them to the attention of those who make the decisions in this country through other means.

We strongly support the attitude in evidence in the Sixth Alternative, submitted by the Wells District Grazing Board. This proposal takes the *rational* approach to the grazing issue by stating the objective as:

Increase the yield of usable livestock forage sufficiently to meet at least the full grazing preference demand on all allotments where potential exists to sustain this level of use, and the livestock operator is willing to actively cooperate in planning and implementing the improvements and management actions necessary to meet this objective.

Not only does this statement reveal a much more helpful, realistic, and neighborly attitude, it would go a long way towards helping maintain the health of a very important industry to our Nation. This alternative would not approach the grazing issue in an arbitrary, RA-wide, insensitive fashion, but would deal with the issue rationally, case by case, trying to bring a resource to its full potential.

We look forward, with interest, to the resolution of the errors and attitudes contained in this document.

Dick Roth
Manager
Big Springs Ranch
Flying 'S' Land & Cattle Co.

DR/sd

Comment Letter 35

**FLYING "S" LAND & CATTLE COMPANY
BIG SPRINGS RANCH
WELLS, NEVADA 89835**

15 August 1983

Mr. Rod Harris
BLM District Manager
Elko, Nevada

Dear Sir:

As manager of the Big Springs Ranch, I would like to go on record supporting the Sixth Alternative (copy enclosed), as proposed by the Nevada Grazing Board for District N-1.

As submitted in greater detail in other comments, we feel the BLM's Preferred Alternative for the WRA-RMP/EIS to be based on erroneous information, arbitrary attempts to solve a diversified issue, and an underlying prejudiced and antagonistic attitude towards the ranching community.

We feel the Sixth Alternative to be rational, realistic, and fair, especially in relation to livestock grazing.

Thank you for your forthcoming solutions to the problems in your document.

Sincerely,

Dick Roth
Manager
Big Springs Ranch
Flying 'S' Land & Cattle

DK/sd
encl.
CC: Bob Wright

PHONE: ELKO, NEVADA, TOLL STATION BIG SPRINGS RANCH #1

Comment Letter 36

Sierra Pacific Power Company

August 18, 1983

Mr. Rodney Harris, Manager
Elko District
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

RE: Draft Wells Resource Management Plan and Environmental Impact Statement

Dear Mr. Harris:

Thank you for the opportunity to comment on the Draft Wells RMP and EIS. BLM Elko District, Wells Resource Area is to be congratulated for its multiple use planning efforts. The identification of the corridor issue and subsequent designation of corridors in this Draft RMP are in keeping with the intent of the Federal Land Policy and Management Act (FLPMA).

Sierra Pacific Power Company supports the "Preferred Alternative" subject to the clarification and resolution of areas of major concern outlined in this letter.

The following are areas of major concern that Sierra Pacific feels need to be clarified and resolved:

1. a) Draft RMP/EIS Quote:

GLOSSARY-page G-1: "CORRIDOR: A passageway through which all utility transmission (powerlines, gas pipelines, etc.) and transportation (roads, railroads) facilities, both existing and proposed, are located."

b) Problem:

Sierra Pacific finds this definition to be misleading and not consistent with the definitions or their intent as found in 43 CFR 2800. The use of "All" in this definition leads one to believe that there are no utility and transportation facilities outside of a "Corridor."

Due to topographic constraints, compatibility, etc. not all transportation and utility facilities will be in the same corridor. Also, we find that a definition of a "designated corridor" needs to be included in the Glossary.

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P. O. BOX 10100/RENO, NEVADA 89520/ TELEPHONE 702/788-4011



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Mr. Harris
August 18, 1983
Page 2

c) Solution:

Sierra Pacific recommends the following changes and additions to be made to the Glossary.

1) Change definition as follows:

"Corridor: A passageway through which any combination of similar, identical, or compatible utility transmission (powerlines, gas pipelines, etc.) and transportation (roads, railroads) facilities, both existing and proposed are located."

2) Add definition as follows:

"Designated Corridor: A three-mile (3) wide passage on which existing transportation and utility facilities are located and are suitable to accommodate future transportation and utility facilities which are similar, identical, or compatible."

2. a) Draft RMP/EIS Quote: None. See Map 2-9.

b) Problem:

The term "Designated Corridors - Low Visibility" is used on Map 2-9. This term is undefined in the Draft RMP and EIS. This oversight will surely lead to a misunderstanding of accepted use within this "designated corridor" by transportation and utility users. In meeting with Charles Boyer - Wells R.A. Manager on August 9, 1983, Sierra Pacific was informed of specific constraints and stipulations within corridor V-K-Y-WW-Q (see map 2-9). Yet, these constraints and stipulations (i.e., no powerlines along Interstate 80) are not defined or addressed in the Draft RMP and EIS. Hence, the public has not had the opportunity to review or comment on BLM intentions in the Wells Resource Area.

c) Solution:

Sierra Pacific recommends that the above-mentioned issue be addressed in the Final RMP and EIS.

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Comment Letter 36

Mr. Harris
August 18, 1983
Page 3

3. a) Draft RMP/EIS Quote:

Chapter 2 - Alternatives - Preferred Alternative - Issue 2: CORRIDORS - page 2-22

"3. Propose for designation...Power Projects. Also included is a narrowed width of the MM-NN corridor segment and selection of the P-GG-Q corridor segment to protect wilderness quality of the South Pequop and Goshute Peak WSAs respectively."

(Emphasis Added)

Chapter 4 - Environmental Consequences - Mid-range Alternative - Issue 2: CORRIDORS - page 4-31 (Preferred Alternatives same as Mid-range Alternative)

"2. Resource values would be degraded.

Designation and/or identification of 566 miles of corridors is expected to have significant short- and long-term adverse impacts to visual quality, wilderness character and wildlife habitat. These resources would be affected because of the locations of some of the corridors. Impacts are generally fewer than in the Resource Production Alternative. Corridor segments G-F; K-I; I-U; and U-B on Map 2-9 would cause significant visual impairment.

The solitude and primitive recreation experience within the northern portion of the South Pequop WSA would be impaired by the adjacent corridor segment MM-NN. Corridor segment O-XX-P would be within the southeastern portion of the Goshute Peak WSA. The location of the power line, railroad and/or other transportation routes in this area would not only greatly impair the experience of solitude and primitive recreation but would also cause the loss of naturalness in the area."

(Emphasis Added)

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Comment Letter 36

Mr. Harris
August 18, 1983
Page 4

b) Problem:

Sierra Pacific finds the above statements unacceptable as written. These statements constitute a "wilderness buffer zone" around the Wilderness Study Areas in the Wells Resource Area. Not one corridor shown in the Preferred Alternative encroaches upon a WSA. Corridor distances from WSA boundaries range from common boundaries to a six-mile (6) separation. Sierra Pacific feels that Congress did not intend to create wilderness buffer zones. If a WSA cannot stand on its own merit as outlined in the Wilderness Act of September 3, 1964, then the WSA unit should be recommended as unsuitable for inclusion in the National Wilderness Preservation System. An example would be the suggested loss of naturalness in Goshute Peak WSA because of the influence of the corridor which lies outside the WSA boundary. When the Wilderness Act talks of solitude or primitive and unconfined type of recreation, it was looking to preserve those opportunities within a given area or boundary. There is nothing to our knowledge in the Wilderness Act that states or implies that man's imprint will not be seen from a wilderness area.

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c) Solution:

Sierra Pacific recommends that the BLM rewrite the environmental consequences for the corridor issue. Adverse impact on wilderness characteristics is improperly applied to the corridor.

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4. a) Draft RMP/EIS Quote:

Chapter 4 - Environmental Consequences - Mid-range Alternative - Issue 2: CORRIDORS page 4-31 (Preferred Alternative same as Mid-range Alternative)

"Bald eagles would be adversely impacted from increased shooting deaths as a result of powerline placement near highways on segment P-O. Wintering bald eagles would be adversely impacted if construction took place from November 1 to March 31 on segment I-U."

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Comment Letter 36

Mr. Harris
August 18, 1983
Page 5

b) Problem:

Sierra Pacific questions the first sentence of the above-mentioned paragraph. Sierra Pacific is unaware of any shooting of bald eagles from power lines in this state. Further, BLM appears to have taken the position that a supposed adverse impact to bald eagles by power line placement cannot be mitigated. This is totally incorrect. The utility industry, through years of research and experience, is able to mitigate adverse impacts to raptors. Mitigation measures can either enhance raptor habitat or deter raptors from areas such as mentioned in this RMP.

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c) Solution:

The entire paragraph on bald eagles deals in areas of mitigations. Thus, the adverse impacts of power lines and construction time are not environmental consequences but mitigation measures. Mitigation is project related on a case by case basis and would be a condition of a grant of right-of-way. Therefore, Sierra Pacific Power Company requests the deletion of the entire paragraph in the Final RMP and EIS.

5. a) Draft RMP/EIS Quote: None. (See Map 2-9)

b) Problem:

Mapping of the Corridors is of extreme importance in land use planning process. This mapping becomes the public documentation (Resource Management Plan) with which the BLM will manage public lands for this use. Therefore, the need for complete and reasonably accurate maps is essential. Corridor A or E-PP-I-U-ZZ-B was to represent the AT&T Transcontinental Cable. This corridor was also represented in the Western Regional Corridor Study. From a field investigation on August 9, 1983, it would appear that corridor A or E-PP-I-U-ZZ-B on Map 2-9 is located south of the actual location of the AT&T Cable.

Also, Sierra Pacific finds some corridors located (see Exhibits "A" and "B") in areas having either no potential for utilization as corridors or corridors excluded where facilities presently exist.

Comment Letter 36

Mr. Harris
August 18, 1983
Page 6

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c) Solution:

Because of the crucial and essential need for corridor mapping in the Final RMP and EIS, Sierra Pacific strongly urges and recommends the following:

- 1) Accurately locate the AT&T Transcontinental Cable on Map 2-9.
- 2) Implement the corridor changes and additions shown on the attached "Wells" 1:250,000 Quad Map (Exhibit "A") and the "Elko" 1:250,000 Quad Map (Exhibit "B"). The solid black line represents the Draft RMP and EIS corridor location. The solid red line represents the requested corridor changes and additions. Also attached for your information is a graphic display of the mapping discrepancies and changes.
- 3) Attached is a brief summary, hereto referred to as Exhibit, "C," of each corridor segment describing in general what and where the corridor traverses, pointing out any exceptions to the corridor widths and locations. BLM may want to consider implementing portions of this in the Final RMP and EIS.

6. a) Draft RMP and EIS Quote:

Chapter 2 - Preferred Alternative - Issue 1:
Lands page 2-22

"Objective: To allow disposals, land tenure adjustments, and land use authorizations based on long-range goals. These goals are to identify lands to be disposed of or retained and administered for multiple use. These identifications are based on land manageability and quality of resource values and are shown on Map 2-7.

Short- and Long-Term Management Action:
Dispose of 93,150 acres, including community expansion lands, primarily through public sale."

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Mr. Harris
August 18, 1983
Page 7

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- b) Problem: Sierra Pacific Power Company has purchased the Gamble-Winecup Ranches for the proposed Thousand Springs Power Plant. Our concern centers around the land tenure adjustments in the Thousand Springs Creek and Toano Draw area. Sierra Pacific does not find definitions or explanation to the terms Retention/Consolidation - R/C or Retention/Management - R/M referenced on Map 2-7.

Can exchanges or sales be made in either R/C or R/M areas? Can a power plant site be "blocked" up in either R/C or R/M areas?

- c) Solution: As you can see, Sierra Pacific has many questions as to the impact of land tenure adjustment in the Draft RMP and EIS. Sierra Pacific requests that Land Tenure Adjustments not preclude acquisitions by direct sale or exchange of lands for a power plant site.

Sierra Pacific is anxious to have the corridor issue in the Wells RMP developed with the most up-to-date and complete data. Sierra Pacific feels the Wells RMP is the cornerstone for the guidance and direction of the future RMP's to be developed in Nevada. Sierra Pacific feels consistency of the RMP's on the corridor issue is essential to developing a statewide transportation and utility corridor system.

We hope that our comments and concerns will be instrumental in the outcome of the Wells RMP.

Sincerely,

Michael P. Sullivan
Michael P. Sullivan
Manager, Environmental Affairs
& Right-of-Way Acquisition

MPS/cf
EAE4/69-84

Attachment

cc: Ed Spang - BLM, Nevada State Director, Reno
Stu Gearhart - BLM, Reno

Comment Letter 36

EXHIBIT "C"

SUMMARY - CORRIDOR SEGMENTS

This exhibit is hereby made a part of Sierra Pacific's comments on the Draft Wells RMP and EIS.

2 The following is a written analysis of the proposed Corridor Map 2-9 in the Draft RMP and EIS. This written analysis is to be used along with Exhibits "A" and "B." This analysis will address the BLM proposals and requested changes by Sierra Pacific.

Corridor Segment	Comments
F-G	<p>RMP: A one and one-half mile corridor each side of Highway 93 from the Idaho border to Henry, Nevada; thence, straight south presumably following the Idaho Power Co. 138 kV transmission line to intersection with Sierra Pacific's 345 kV transmission line.</p> <p>SPPCo: The corridor needs to be modified as shown on Exhibit "A." A corridor thru the Jackpot community and its logical expansion is not useable. If BLM wishes to include Highway 93, Sierra Pacific would then request the expansion of the corridor to the red line on the west. The changes south of Jackpot to "G" are self-explanatory.</p>
G-PP-A-E	<p>RMP: It is presumed that the intent of this corridor was to follow the existing SPPCo. 345 kV transmission line and AT&T Cable.</p> <p>SPPCo: The plotting of the 345 kV transmission line has pointed out some major mapping discrepancies. Also, field investigation has found extensive agricultural development around the Mary's River Ranch. Exhibit "A" reflects where the corridor should be along with some suggested changes. Also, the AT&T Cable needs to be located in this area.</p>

Comment Letter 36

G-H-I-K

RMP: It is presumed that the intent of this corridor was to generally follow the IPCo. 138kV transmission line and Highway 93 to Wells, Nevada.

SPPCo: Suggest that the corridor be designated as outlined on Exhibit "A."

H-U-S

No mapping problems.

PP-I-U-ZZ-B

RMP: This corridor was generally shown on the Western Regional Corridor Study and is supposed to be AT&T Cable.

SPPCo: Field investigation shows the AT&T Cable to be farther north. The AT&T Cable needs to be more accurately located on Map 2-9. Sierra Pacific will offer BLM assistance in this matter upon request.

S-B

RMP: This corridor generally follows the Southern Pacific Railroad and Highway 30 from Cobre, Nevada, to a point approximately three miles northeast of Montello, Nevada; thence, north to the presumed AT&T Cable corridor.

SPPCo: The corridor on the south side of the Southern Pacific Railroad from three miles northeast of Montello, Nevada, to the Utah border should be included in the Final RMP and EIS. BLM has cited the Peregrine Falcon habitat as the reason for excluding this corridor. Sierra Pacific does not support or agree with these findings. BLM is basing its decision on historical habitat as stated on page 3-9 of the Draft RMP and EIS. The Draft RMP and EIS does not inventory any Peregrine Falcons within this area.

V-K-Y

No mapping problems.

S-K

RMP: No continuous corridor along Southern Pacific Railroad from Cobre, Nevada, to Wells, Nevada.

Comment Letter 36

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K-MM-NN and
K-MM-R

SPPCo: This corridor should be included in the Final RMP and EIS in order to provide for a continuous transportation corridor.

RMP: Narrowed width of MM because of WSA to the south.

SPPCo: Basically these corridors are useable with the exception of the crossing of the Pequop Mountains. Because of topographic constraints, a split corridor is recommended as shown on Exhibit "B."

R-NN-RR-M-LL

RMP: Corridor follows the Nevada Northern Railroad.

SPPCo: No problem with mapping or corridor to Currie (M). Corridor segment M-LL should be moved west as shown on Exhibit "B" so as to avoid Goshute Lake.

RR-O and M-O

No mapping problems.

S-Y-R; S-WW
and Y-WW

RMP: Map 2-9 is self-explanatory of area.

SPPCo: S-WW corridor as mapped by BLM would traverse along the top of the Toano Range. Also in this area, a portion of the Western Pacific Railroad is not included in a corridor. Sierra Pacific recommends that the corridors be altered in this area per Exhibits "A" and "B."

WW-Q

RMP: This corridor generally follows I-80 to Wendover, Utah.

SPPCo: Passage of transportation and utility facilities thru Wendover are greatly constrained by the mountains on the north and the U.S. Air Force base on the south. This, coupled with the community expansion, makes passage extremely difficult. Sierra Pacific recommends a two-mile (2) wide corridor on the north side of the mountains as shown on Exhibit "B."

Q-GG-P-O and
Q-XX-P-O

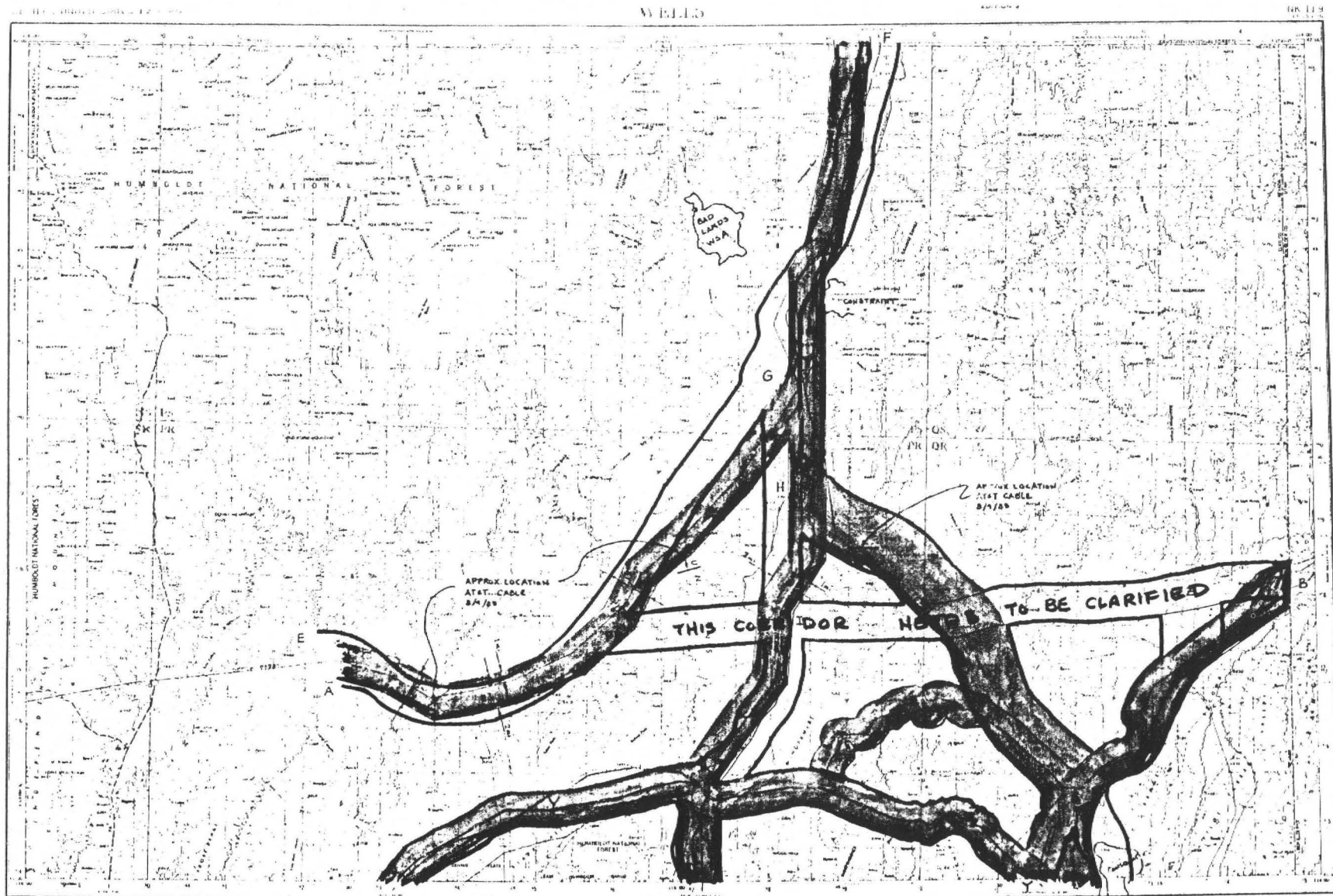
RMP: The map and EIS is self-explanatory.

SPPCo: WSA's topographic constraints and military installations are the prime factors in recommending the corridors as shown on Exhibit "B." This recommendation provides for a more useable and feasible corridor than presently given in the Draft RMP and EIS.

Utah Corridors

RMP: Not addressed.

SPPCo: These two, two-mile wide corridors were addressed in the Western Regional Corridor Study - May 1980 - Utah. The Nevada map of this study overlooked these corridors. Sierra Pacific questions whether the Elko District has contacted the adjacent BLM Districts in Utah to discuss the corridor issue. Sierra Pacific recommends that these corridors be addressed in the Final RMP and EIS.



LOS ANGELES
SANTA BARBARA
CALIFORNIA

CONTOUR INTERVAL 200 FEET
WITH SUPPLEMENTARY CONTOURS AT 100 FOOT INTERVALS
TRANSVERSE MERIDIAN PROJECTION

— RMP CORRIDORS
— RECOMMENDED CORRIDOR CHANGE

EXHIBIT A

STOCK NO. WADSWORTH 119-03

Comment Letter 37



Lands of Sierra,
SUBSIDIARY OF SIERRA PACIFIC POWER CO.

100 EAST MOANA LANE
P.O. BOX 10100, RENO, NEVADA 89520 • TELEPHONE (70

August 18, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Re: Draft Wells Resource Management Plan and Environmental Impact Statement

Dear Mr. Harris:

Thank you for this opportunity to comment on the Draft Wells Resource Management Plan and Environmental Impact Statement. Lands of Sierra, Inc. is the owner of the Gamble-Winecup Ranches, with holdings of over 248,000 acres within the boundaries of the Wells Resource Area. Lands of Sierra has specific concerns regarding the classification of and proposed management for the grazing lands we lease from the Bureau of Land Management.

Map 2-7 depicts the land tenure adjustments proposed in the Wells Resource Area for the next twenty years. Lands of Sierra is attempting to consolidate its land holdings in the area of the Gamble Ranch headquarters. Checkerboard ownership and isolated tracts of other private ownership make improvements to our cattle operation difficult to accomplish. We would like to block up some of these areas around the ranch headquarters through land exchanges with the Bureau of Land Management. It is our understanding that under present policy, lands in the disposal classification must be offered for public sale for a two year period prior to being available for exchange. The requirement for this two year offering could significantly affect our plans for consolidation and land improvements. As these lands are within the checkerboard ownership pattern owned by either Lands of Sierra or the Bureau of Land Management, we don't feel that there will be a general public interest in these isolated tracts.

We propose that the boundary for the disposal area be located further westerly of the Gamble Ranch headquarters, thus separating these isolated tracts so that they would fall into the retention/management category, allowing for future land exchanges. The parcels of specific concern were identified in our letters dated April 11, 1983 and April 21, 1983, to Mr. Gary Bowers.

The Pilot Valley allotment is included in the lands classified for disposal, and as I am sure you are aware, this allotment is one of the few within the Resource Area that provides winter range for cattle grazing. We understand that the multitude of private land ownership has made management of this allotment difficult, however, it would create a financial hardship to our cattle operations if we were to lose these grazing rights. We are also aware of the requirements imposed on BLM through the Asset Management Program. More recently, as the Asset Management Program has been de-emphasized, it is our

Comment Letter 37

Mr. Rodney Harris
August 18, 1983
Page 2

hope that the land disposal program will likewise be diminished. We request that if these lands are scheduled for disposal in the future, that the present licensees be given priority to purchase these tracts.

In Table 2-1 on Page 2-5 listed under the Pilot/Crittenden Resource Conflict Area, we note that the Pilot Valley allotment has been placed within the custodial category. It is our understanding that it has been so classified because management of the allotment is complicated by the multitude of private owners. While under the custodial classification, the allotment will receive minimal allocations for range improvements, until it is either disposed of or reclassified. If the disposal does not occur during the course of this twenty year plan, due to some future policy change, the licensees will not have received their share of improvements from their grazing fees. We therefore urge you to reconsider the disposal alternative, given the recently announced changes to the Asset Management Policy. We further urge the BLM to provide as much advance notice to the permittees as possible, in the event that these lands are scheduled for disposal.

2 | On Page 2-5, the acreage listed under the "Private Acres" heading for the Gamble individual allotment is in error. Lands of Sierra and others own over 120,000 acres within this allotment, as compared to the 7,045 acres listed in the table.

Regarding the Crittenden Reservoir, the Preferred Alternative states a long term management action to...."Manage Crittenden Reservoir (if land around the reservoir can be acquired through exchange) as a RAMC develop new facilities at this site." To dispel any misunderstandings that may have occurred in the past, the private lands surrounding Crittenden Reservoir and the reservoir itself, are not available for land exchange or sale. It is our intention to continue managing this water resource in its present mode.

Should you have any questions concerning these comments, or need additional information concerning the ranch operations, please call me.

Sincerely,

Gary M. Soule
Gary M. Soule
Vice President

GMS/MPS/ks

cc: Ed Spang, BLM
Nevada State Director

4-85

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Comment Letter 38

Dear Sirs:

My name is Maurice Fuller and I am a stockholder and at present the President of the Salmon River Cattleman's Association.

I would like to first comment on the spring turn out time for cattle. I would like to recommend an early turn out time, by the 15th of April when the weather is permitting and especially when there has been plenty of grass carried over from the season before. This falls into the category of management, with good management the range land and grass will improve for the livestock and give more feed for the wildlife. Several years ago the S.R.C.A. received permission from the BLM to remove all of the wild horses from the private and public range lands. By doing this the grass has improved 100% and the wildlife like deer and sage grouse have also increased. So with good management livestock and wildlife can and will work together.

But good management requires many things and fences are a needed and important part on the range lands, such as to control over grazing. But the Fish and Game wants to put up fences that are only 4 strands, 48 inches high and with the bottom wire 18 inches off the ground so wildlife can crawl underneath. With the bottom wire so high calves can easily crawl under, and with only 4 strands of wire and 48 inches high, cows could walk right through this type of fence.

The Salmon River Cattleman's Association have been making improvements on the range lands since it was organized on the 28th day of April 1947. These improvements consist of plowing and spraying sagebrush and reseeding these lands into useable range lands.

Comment Letter 38

Plus installing numerous miles of pipe line and hundreds of water troughs. With these many improvements it has cost the association between 1 million and 1½ million dollars over the period of years. These improvements were for the livestock, but the wildlife has also benefitted from these improvements. The increased numbers of wildlife can alone prove this statement. I would recommend the BLM to start a program of spraying sagebrush and the reseeding of the grass lands. With this, in the near future, would not only help make the range lands better for the livestock but also make it better for the wildlife.

A.U.M.'s

The S.R.C.A. has always used all of their A.U.M.'s every grazing season, while other ranchers may not. In light of this fact many ranchers may take a cut in their allotments of A.U.M.'s, the S.R.C.A. cannot afford to take a cut, because a certain amount of cattle will have to be left home costing the cattleman more money in feeding his cattle.

With this statement I would like to bring to your attention a deal the S.R.C.A. worked with the BLM area manager Don Ray in the year of 1968. The S.R.C.A. voluntarily took nonuse on 4000 A.U.M.'s with the intention if the S.R.C.A. would make improvements on the range land, like improving stock water with pipe lines and springs, spraying sagebrush, do some reseeding and with the removal of the wild horses, the BLM area manager led us, the S.R.C.A., to believe we would receive back these 4000 A.U.M.'s after these improvements were made. After 15 years the S.R.C.A. have still not receive these A.U.M.'s back.

Comment Letter 38

I feel that the S.R.C.A. has fulfilled their part of the agreement and should be entitled to the 4000 A.U.M.'s, which were voluntarily put aside, back from the BLM who have seemed to forgot that the deal was ever made.

Sincerely yours,



Maurice Fuller
President of the Salmon River Cattleman's Association
Route 2 Box 5536
Twin Falls, Idaho 83301

Comment Letter 39



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO:

GREAT BASIN GROUP
P.O. Box 80396
University Station
Reno, Nevada 89507

LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

720 Brookfield Drive
Reno, Nevada 89503
August 17, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

Thank you for the opportunity to comment on the Draft Wells Resource Area Resource Management Plan and Environmental Impact Statement. We think you and your staff have done a great deal of work on this document and that it is well-prepared and well-written. Division of the entire area into Resource Conflict Areas makes the differences in the various regions clear to the reader. Our comments will address the various issues in turn, either stating the reasons for supporting the preferred alternative if we do so or stating the rationale for adopting some other alternative.

We favor the preferred alternative on the wilderness issue and congratulate your staff on the excellent presentation of this issue. The four WSA's in the Wells area are all of outstanding wilderness quality and will make important additions to the National Wilderness System. With the boundaries drawn as suggested in the preferred alternative, almost all real resource conflicts are avoided, and the areas are eminently manageable. The Badlands WSA is a 'little jewel' of wilderness with its spectacular canyon walls and the fine trout fishing in Salmon Falls Creek. Bluebell, Goshute Peak, and South Pequop are larger areas which provide not only outstanding solitude and primitive recreation values but are also important habitat for raptors including the bald eagle.

Although recreation use in the Wells area is now generally light, except for the Ruby Marsh campground, it will undoubtedly increase as those who are tired of heavily used areas come to enjoy the scenic and recreational values of Eastern Nevada. For this reason we favor the preferred alternative which identifies five recreation areas to be designated or upgraded. However, we



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

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 Las Vegas, Nevada 89119

Rodney Harris
 8/17/83. Page 2.

feel that the 1650 acre Salmon Falls Creek--an extremely important scenic and recreation area--should have ORV use limited to designated roads and trails, as proposed in the Resource Protection alternative. In this way ORV's are not excluded but managed so as not to impact the resource. We are certainly in favor of upgrading the Ruby Marsh campground, withdrawing it from mineral entry, and limiting ORV use to designated roads and trails.

We favor the preferred alternative on the wild horse issue which maintains the herds at approximately the present populations and continues to monitor habitat conditions. Presumably the six water development projects for horses could also be used by wildlife and cattle. We also support the preferred alternative calling for a terrestrial wildlife habitat plan that protects 250 springs and modifies 650 miles of fence in big game habitats.

The proposal to increase livestock grazing in the preferred alternative from 289,000 to 294,000 AUM's seems contrary to the information provided in your document on the condition of the range. According to your estimates of ecological range condition (Pg. 3-25), the Wells Resource Area has 20% in poor condition, 54% in fair condition, 25% in good condition, and only 1% in excellent condition. It would appear that some decrease in AUM's would be in order, particularly in RCA's where over 20% of the range is estimated to be in poor condition-- (O'Neill-Salmon Falls, Goose Creek, and especially Cherry Creek with 40% of the range in poor condition.) It is particularly important that grazing seasons be adjusted so that perennial grasses not be grazed during the critical growth period (early May through mid-July), and winter fat not be grazed during the summer growth period. The spending of over two million dollars for livestock grazing improvements does not justify the decision to increase the AUM's. We favor an alternative on this issue that takes into account the real condition of the range and yet is not economically and politically unfeasible such as the 39% proposed reduction in the Resource Protection Alternative. Since no such alternative has been included, we ask that the preferred alternative be modified in this direction.

35



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Toiyabe Chapter - Nevada and Eastern California

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 Las Vegas, Nevada 89119

Rodney Harris,
 8/17/83. Page 3.

Riparian/Stream Habitat is an extremely important issue in this Resource Area and one that needs to be given top priority. As is stated on Page 3-14 of this document, "livestock grazing was primarily responsible for producing and maintaining deteriorated aquatic/riparian habitat conditions. . . Lowered water tables, higher stream temperatures, increased sedimentation, decreased water storage capacities, unstable stream banks, and elimination of streambank vegetation all are common occurrences on Wells RA streams where riparian zones are not protected." This serious problem needs to be addressed immediately in an all-out effort. Consequently, we feel that the Resource Protection Alternative which improves conditions on 220 miles of stream and 5935 acres of riparian habitat is the only logical choice for the BLM to make on this issue. The 95.5 miles and 2518 acres in the Preferred Alternative is totally inadequate and cannot be justified by your own research and statistics. Bold steps are needed if this problem is to be solved.

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On the woodland products issue, we are completely mystified as to why 5250 cords per year are listed for the Resource Protection Alternative and only 1300 cords per year for the midrange and preferred alternatives. We favor the latter. We question the cutting of Christmas trees on the entire 600,000 to 700,000 acres of woodlands (presumably not including the wilderness recommendations) in the RA. If this is a one tree per family permit, it will undoubtedly have little effect, but if commercial cutting is allowed, we are concerned that all of the woodlands are to be subjected to such cutting.

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One of our grave concerns with the proposed alternative involves the amount of land recommended for land disposal. 93,150 acres is a large amount of land, especially when the balanced mid-range alternative recommends only 18,065 acres. We believe that most of the lands identified for disposal in the preferred alternative (as shown on Map 2-7) should be kept in public ownership and then used as trading stock to acquire environmentally sensitive lands that are now in private ownership. We realize that checkerboard land is sometimes difficult to manage, but if the public land is sold, there will be no way to acquire the private lands where this is desirable. We therefore favor the mid-range alternative on land disposal.

88-4



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Toiyabe Chapter - Nevada and Eastern California

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 Las Vegas, Nevada 89119

Rodney Harris
 8/17/83. Page 4

It is important to identify utility corridors within the resource area, but every care must be taken that such corridors do not interfere with other values. In the preferred alternative section MM-NN seems to be unnecessary and undesirable because of its impact on the South Pequop WSA.

The Salt Lake ACEC is an important addition to preserve peregrine falcon habitat, but the 6200 acre proposal in the preferred alternative is entirely too small. We recommend the full 16,200 acres included in the Resource Protection Alternative. Other potential ACEC's should also be identified to help preserve special values (for example, the Steptoe dace) in the Wells Resource Area.

Please send us a further clarification on the Christmas tree cutting issue and a copy of your final decision and EIS when these are completed.

Sincerely,

Marjorie Sill
 Conservation Chair



SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

August 17, 1983
 PLEASE REPLY TO: _____

GREAT BASIN GROUP
 P.O. Box 8098
 University Station
 Reno, Nevada 89507

LAS VEGAS GROUP
 P.O. Box 19777
 Las Vegas, Nevada 89119

Rod Harris, Manager
 BLM/Elko District
 PO Box 831
 Elko, NV 89801

Dear Manager Harris,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club, I am submitting these comments supplemental to my testimony at the 6/20/83 public hearing in Reno on the Draft Wells Resource Area RMP and EIS.

Before commenting on the substance of the document, I would like to compliment the authors on a well-written, well-organized and readable document. I only wish the substance of the document had measured up to its style!

CHAPTER 1: PLANNING ISSUES AND CRITERIA

The stated overall purpose of the resource management planning process (p.1-1) is rather utilitarian. We would like to believe that the Bureau is striving to improve the resources of the resource area whether or not the improvements would result in increased goods and services to the users or public, but because we are all striving to be good stewards of the land and all its resources, are we not?

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It is not clear from the document what vegetation inventory data (1-2) is available or used by BLM. Table A2-2 cites no source. Is the estimated ecological range condition based on a vegetation inventory? If so, how and when was the inventory taken?

In Issue 2 (1-5), key or critical wildlife habitats should be added as a category that should not be adversely affected by utility or transportation corridors.

In Issue 4, Planning Criteria 2 (1-5), it is not stated that ORVs will be limited or closed if ORV use results in visual or environmental degradation, specifically, scars on hills or erosion. Isn't BLM concerned about these problems and should they not be part of the RMPlan?

In Issue 6, Planning Criteria (1-7), what happened to livestock reductions as a means of range improvement? We are certain we raised this as an issue during scoping. We feel BLM should be capable of adjusting numbers to the carrying capacity of the range because in Issue 7, Planning Criteria 2 (1-7), it is proposed to establish maximum wildhorse numbers compatible with vegetation requirements. Please explain.

Also on Issue 6, Planning Criteria 1, we are concerned with the

4-89

broad wording of the section on water developments for cattle. We certainly would not support any expenditure of funds for this purpose unless BLM guarantees that an adequate supply of water would be left at the source for wildlife and existing riparian vegetation would be maintained. Perhaps such language should be included in this planning criteria.

In Issue 9, Planning Criteria 3 (1-8), we noticed that no priority is given to most wildlife species (non-game and non-T&E) for special management consideration in aquatic and riparian areas. Since the documents states that most species are highly dependent on riparian areas for food, cover, and water, we feel that a third category - all non-game animals - should be added to this planning criteria.

CHAPTER 2: ALTERNATIVES
 RCAs. The division of the Wells RA into resource conflict areas is unique to this district. While it appears to make writing and reviewing this document easier, we fear that it contributes to the lack of specificity in resource problem identification and proposed management actions for real on-the-ground problems.

Doesn't the Spruce/Goshutes RCA (2-1) contain wildlife? If so, are there not serious resource problems between wildlife and livestock? We have the same question on the Pilot/Crittenden RCA (2-2) and the Ruby/Wood Hills RCA (2-2).

Selective Management Categorization. This process (2-2) has always filled us with great dismay. How allotments are categorized and what the short and long term effects of such categorizations will be are unknown. Why the permittees doing the best job (M allotments) are not rewarded in favor of others who have more problems, and how C allotments are written off by BLM as not improvable violate not only common sense, but also our strong values of resource conservation and good land stewardship.

In particular, the selective management categorization in this document is obscure and implausible. While the criteria identified in Appendix 2 are clear, the judgments, apparently not subject to public review, some how resulted in an inordinate number of M allotments. The characteristics for M allotments (2-27&28) do not match up with the estimated ecological condition in Table A2-2, nor the allotment categorizations in Table A2-1. For instance, resource conflicts are identified in many allotments which are then judged to be M. Yet, M allotments are supposed to have resource conflicts that can be corrected with minimal effort. Are we then to believe that the 12 allotments with I or C resource conflicts which were judged to be in the M category anyway have easily corrected resource conflicts? Or that the 3 RCAs with a high intensity conflict level have 16 out of a total of 29 allotments in the M category - i.e., all have current satisfactory conditions? We are dissatisfied with this process and feel it should be opened up for public scrutiny.

Table 2-1 (2-3) is also confusing. In the allotments where

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grazing preference used exceeds 100%, are we to understand that the percentage over 100% represents overgrazing, trespass grazing, or temporary non-renewable use or something else?

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Management Alternatives. We disagree with the decision to eliminate from study a no grazing alternative. An EIS is not a decision document, but is written to analyze the environmental impacts of BLM actions. A no grazing alternative would provide the baseline data against which to judge other alternatives. We fear that it was eliminated not because of political infeasibility, but because an analysis would show that the environmental impacts of not grazing the public lands would have far more beneficial effects on all natural resources, besides being much cheaper than all the other alternatives, that the BLM decision-makers and the public would have to reconsider whether the public benefits of livestock grazing as currently practiced outweigh its public costs. Besides, such an alternative is required by the court order which mandated grazing EISs!

2

The discussion of the categorization of the Wells RA into three management classifications (2-2) was very perfunctory. Are we to understand that all lands identified for disposal (D) are difficult to manage and have essentially no resource values? And are resource values fewer and consequently, less cost effective to manage in Retention/Management (R/M) areas than in Retention/Consolidation (R/C) areas? We're not sure what this language means. Map 2-7 is rather large scale. It is difficult to identify the differences between R/M and R/C lands or why the huge area around Montello is any more worthless than the other checkerboard areas. And since it's public knowledge that many wildlife species, including antelope and elk use the lower lying areas slated for disposal, how does BLM justify that the D lands have no resource values?

2

ISSUE 1: LANDS. We support the Resource Protection Alternative proposal on lands. Although we generally support public land disposal for community expansion, we greatly object to the disposal of 72,245 acres around Montello in the Resource Production and Preferred Alternatives. At first, we thought the acreage must be a typo as the other communities, West Wendover, Jackpot, and Wells, average about 7000 acres each proposed for disposal. But the inflated figure is repeated throughout the document. If real, no explanation or justification is given for the huge expansion planned for Montello. Please provide additional information in the FEIS.

ISSUE 2: CORRIDORS. We support the Resource Protection Alternative proposal on corridors. We totally reject the 1023 miles proposed in the Resource Production as exhorbitant. It appears that more acreage for corridors is proposed than acreage for wilderness. We do not understand how BLM can propose many of the corridors as the proposals violate the planning criteria set out in Chapter 1. The EIS documents that some proposed corridors have significant negative impacts on wilderness areas, ACECs, peregrine falcons and eagles, summer deer range and visual

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quality, impacts which should disqualify these sections. Explain.

ISSUE 3: ACCESS. We support the Midrange Alternative on access. BLM does the public a disservice by separating the need for access for administrative and commodity users from other users.

ISSUE 4: RECREATION. We support the Preferred Alternative proposal on recreation.

ISSUE 5: WILDERNESS. We support the Resource Protection Alternative proposal on wilderness. We do indeed feel that the Elko District wilderness inventory was too restrictive in selecting WSAs for review. The four remaining are indeed the very best and should be recommended for wilderness designation. Detailed comments on wilderness will be submitted separately.

ISSUE 6: LIVESTOCK GRAZING. We support the Resource Protection Alternative proposal for livestock grazing, only because we have no other choice. From the information available in the EIS, we do not know if 176,211 AUMs use is within the carrying capacity of the Wells RA or how BLM arrived at this precise number, but we are sure that some reductions will benefit all other resources. We are also sure from BLM "estimates" of range condition and muted recital of resource problems that current use, 288,934 AUMs, is contributing to massive resource problems and conflicts and that the 293,846 AUM figure proposed in the Preferred Alternative is a blatant violation of the law which requires sustained yield management on the public lands.

ISSUE 7: TERRESTRIAL WILDLIFE HABITAT. We support the fence modification and spring protection proposed in the Resource Protection and Preferred Alternatives and the ACEC proposal in the Resource Protection Alternative. These proposals are among the best made in this EIS and we commend the Elko District on the identification and analysis of terrestrial wildlife habitat problems.

Our only criticism lies in the superficial treatment of livestock grazing as a problem and livestock grazing management as a part of the solution. For example, in the preferred alternative (2-24), it is stated that BLM will "consider adjustments" in livestock use to maintain essential or crucial wildlife habitats. We hope BLM will implement adjustments in livestock numbers as well as seasons-of-use to maintain critical wildlife habitats and to improve habitats as well. A good livestock grazing system may improve wildlife habitat far more effectively than the chaining or burning and seeding of 5,500 acres identified in Issue 8, #4. Vegetation manipulation on critical wildlife areas is very risky!

ISSUE 9: RIPARIAN/STREAM HABITAT. We support the Resource Protection proposal on riparian/stream habitat. We again commend BLM for its excellent identification, analysis, and proposed solutions to this long overlooked problem.

ISSUE 10: WOODLAND PRODUCTS. We support the Resource Protection

Comment Letter 40

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Alternative proposal for 4 RCAs under intensive management, but the Midrange Alternative and Preferred Alternative proposal for cords/yr harvest. However, some of the management actions slated for woodland products in the preferred alternative appear quite radical. Removing 75% canopy cover on deer winter range might have negative results as any additional forage obtained may be far outweighed by the loss of the thermal cover needed by deer in the winter. We totally oppose BLM proposing a timber sale on the highly valuable aspen stands (2-25) in the Elko District. Perhaps you should consider why the aspen stands are deteriorating and fit the management action to the resource problem. A good grazing system or deferrment might benefit the aspen stands far more than a fire or a chainsaw!

In general, we fear that the alternatives offered for analysis are variations of the No Action Alternative, at least as far as livestock grazing is concerned. Livestock overgrazing, the most serious of the Wells RA resource problems, has gotten lost in the discussion of the other resource problems, objectives and management actions.

While many of the proposed actions in non-livestock grazing areas sound good, we are concerned whether many of them will be implemented, due to BLM budget and staff constraints, etc. We especially question the panacea of CRMP, as CRMP will only work if all interest groups and agencies are represented in developing on-the-ground plans. Obtaining wide representation on the number of CRMP groups necessary for this huge RA will be difficult if not impossible. Plans developed without wide consensus are doomed to abandonment with every change in national politics. As far as the livestock grazing treatments, we wonder if any of them will be implemented. We hope Treatment 8 will be eliminated immediately, as 80% utilization of any native plant, whether growing or dormant, is very unwise. We greatly hope that BLM really intends to use its monitoring data to adjust stocking rates to vegetation needs. By 1984, BLM will have 3 years of monitoring data (2-30). Will stocking rates be adjusted in 1984? How many years of data does BLM need to adjust livestock numbers to the carrying capacity of the range?

We strongly support the inclusion of the Western State's Sage Grouse Guidelines in the Standard Operating Procedures (2-32). We also strongly urge the addition of a fourth factor to #16 - ORV designation (2-32) - to protect the RA from any undue environmental degradation, especially erosion.

CHAPTER 3: AFFECTED ENVIRONMENT

Indirectly, this chapter does document the majority of resource problems in the Wells RA. We were very disappointed to learn that only 9 allotments have AMPs. This deficiency probably explains why so much of the RA is in poor condition and why there are so many livestock-wildlife conflicts. We hope BLM will strongly pursue the development of AMPs on all allotments with resource conflicts and poor range conditions. The work done on riparian areas in this RA is excellent. We only hope the

42

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solutions match the identification of the problems!

We were quite amused to read that the AUM a wild horse consumes is worth \$7.88, but the AUM a cow and calf consume costs the permittee only \$1.41. Either the value of a wild horse AUM should receive the same subsidy domestic livestock receives or the subsidy the livestock industry receives in lower grazing fees should be calculated into public costs of livestock grazing!

We were also startled to learn that greasewood and horsebrush are poisonous plants, as we have observed both plants being browsed by cattle. We fervently hope that the Elko District does not have any poisonous plant control programs in mind for our native plants, especially rare Astragalus!

CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

Generally, a good effort is made to evaluate the environmental impacts of proposed actions. We do have some questions, however.

42


GENERAL ASSUMPTIONS. Why baseline (4-2) data for vegetation condition and trend, habitat condition, and other parameters is adequate for planning and analysis purposes and is not adequate for making forage allocation decisions is incomprehensible to us. Please explain.

OTHER THRESHOLDS. What possible justification exists for the statement that a significant adverse impact to mineral development would occur if 1% of lands within an RCA or the Wells RA were segregated from mineral entry? I can understand the statement if made by the Nevada Mining Association, but not from the Bureau of Land Management which is supposed to be managing the public lands for multiple use!

Our last comments are on the economic analysis, not the one in Chapter 4, but our own on the implementation costs by alternative (Table 2-7). It appears that the 33% increase proposed for livestock grazing in the Resource Production Alternative would cost the public over \$71/AUM. At \$1.41/AUM, it would take over 50 years to amortize that investment. On the other hand, it appears a far better deal than that in the Preferred Alternative which proposes to spend \$2,381,500 on livestock grazing improvements for a 2% increase in AUMs, or over \$484/AUM. We didn't try to calculate the pay-back time!

It took us many hours to review the DRMP and DEIS. We are left with a hazy view of the Wells RA, its users, its problems and conflicts, and its managers. We trust that its managers have the necessary skills and courage to make the best land use decisions based on this ambivalent document and to implement those decisions in our lifetimes!

Sincerely,



Rose Strickland, Chair, Public Lands Committee



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- Dave Sacrat
Elko
- E E (Ned) Eyrle
Eureka

August 18, 1983

Bureau of Land Management
Rod Harris, District Manager
Elko District
P.O. Box 831
Elko, NV 89801

Dear Mr. Harris:

The following comments on the Wells Resource Area RMP are on behalf of the Nevada Cattlemen's Association.

Alternatives: We support the addition of Alternative Six as submitted by the N-1 Nevada Grazing Board.

General: We have received Lester McKenzie's comments on behalf of the N-1 Grazing Board and support them in their entirety. Much effort has gone into these comments and they are quite thorough. The record should show that we express, and support, each of the points brought up by Mr. McKenzie. We would also appreciate a copy of BLM's response to these questions, points, and concerns. In addition to Mr. McKenzie's comments we offer the following:

1. In general the RMP makes proposals for future management direction based on either inadequate or insufficient data. Projected numbers of livestock and wildlife are purely one or several persons' expectations based on so called "professional judgement". Until BLM installs, and monitors, the study plots and cages necessary to determine the actual trend in range condition and utilization, there isn't any sound basis to make decisions which allocate forage to the range uses. Probably the persons most knowledgeable on the range conditions on specific allotments are the allotment operators.
2. Allotment Categorization. We object to the fact that allotment operators weren't involved in determining what category their allotment should be placed in. According to Washington-level BLM, the involvement by the affected livestock operators was to be an integral part of the categorization process. We cannot support the present

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Comment Letter 41

Bureau of Land Management
Rod Harris, District Manager
Wells Resource Management Plan Comments
Page 2
August 18, 1983

categories proposed for allotments where the operator wasn't in agreement.

3. No Action Alternative - Economic Impacts Section Pp. 4-15.

56

Recreation and Wildlife:

- a) On what basis does BLM predict decreased wildlife populations?
- b) Specifically, how was the predicted decrease of personal income to Elko County of approximately \$54,600 per year determined?

Livestock Grazing:

- a) The statement that under the No Action Alternative (continuance of the existing situation), no economic impacts would result to the ranching community, is incorrect. Unless BLM puts more emphasis in improving the public rangelands through additional seedings, water developments, etc. the ranching community will continue to suffer economically. As with most private enterprise businesses, they have to continue to become more efficient if they are to survive. Under present BLM management this is impossible in most instances.

Wild Horses:

- a) Why will there be no change in wild horse numbers under present management? It is incorrect to assume that the current wild horse situation isn't having any adverse effects on the ranching economy.

4. Pg. 2-33, No. 29. Under the preferred alternative it is explained that "vegetative manipulation that would alter the potential natural plant composition will not be allowed in riparian areas". Couldn't seedings of species not included in the natural plant composition in some areas increase the speed of stabilizing degraded riparian areas?

88

5. Table 3-2, Pp. 3-8. How was the total Gross Income and Net Ranch Income determined? What costs were considered?

Summary: As stated previously and as explained in Mr. McKenzie's comments, this draft includes many incorrect statements and predictions. The final draft will surely be a weak document on which to guide management decisions if left unchanged from the draft.

Comment Letter 41

Bureau of Land Management
Rod Harris, District Manager
Wells Resource Management Plan Comments
Page 3
August 18, 1983

Thank you for this opportunity to comment.

Sincerely,

Paul Bottari
Executive Secretary

PB:sh

Comment Letter 42

Taylor, Ltd.
2110 INTERFIRST TOWER
Austin, Texas 78701
512/478-1071

August 16, 1983

Mr. Rodney Harris, District Manager
Bureau of Land Management - Elko District Office
P. O. Box 811
Elko, Nevada 89801

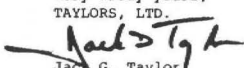
RE: BLM Wells Area Environmental Impact Study

Dear Mr. Harris:

This letter is to register our thoughts and objections to the subject study. I would like to make the following comments:

- 1) The Wood Hills are not correctly identified on the map.
- 2) You state that having our cattle in the Wood Hills affects feed for the deer. I strongly disagree as there are very few deer and they seldom come into the area where we are located. There is feed that has not been used for many years due to no cattle or deer having grazed. The lack of water affects even the deer. In all of our years in the area, we have never seen or had hunters who wanted to go on the Wood Hills as they prefer the Pequop or Ruby Mountains which are nearby and much better for deer.
- 3) Until very recently it has been impossible to develop water or build fences in the Wood Hills area due to a freeze by the BLM. This has greatly handicapped us in our use of the Wood Hills Allotment. We would like to have drilled wells, built dams, installed water pipelines, and built fences if we had been permitted to do so.
- 4) We recommend that the Alternative Plan proposed by the Nevada Grazing Board for District N-1 be adopted.
- 5) The Wood Hills are checkerboarded with Southern Pacific Railroad land. This checkerboard area should be traded out.

Very truly yours,
TAYLORS, LTD.


Jack G. Taylor

JGT:c
cc Rulon Brown

Comment Letter 43

Aug 17, 1983

Dear Mr. Harris,

After reviewing the "sixth alternative to the Wells Environmental statement" I find that I am in full agreement and would endorse it.

Please indicate so.

Thank you,
Kenneth R. Johns

Comment Letter 4 4

August 17, 1983

Rodney Harris
Elko District Manager
Attn. RMP/EIS Team Leader
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

I was unable to attend the Public Hearing in Wells June 21 so my comments may be repetitious. However, I would like to point out a few things that should be given consideration in the Wells Area RMP.

The Salmon River Unit was converted to a summer grazing operation December 2, 1947 when the Salmon River Canal Company transferred the irrigation water from 10,760 acres of land along Salmon Falls Creek into Idaho and gave a 99 year lease to the Salmon River Cattlemen's Association, Inc. for the land involved. Along with deeded land and public land it has provided a balanced livestock operation for summer use and utilization of fall and winter pasture and feeding in southern Idaho. Our mid April turnout in Nevada is critical for farm land tillage.

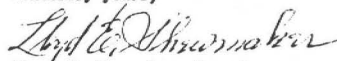
Cattle numbers have remained stable over a long period of time. Large fluctuations are not practical due to the supply of feed, breeding programs, financial requirements, labor, and equipment needs.

In spite of some adverse conditions such as dry years, wild horses, and recessions, our Association has maintained a sound record of accomplishments. We have installed water facilities, pasture fences, and seedings. Certainly the condition of the range will warrant the return of the 4,000 AUM's we put in voluntary suspended non use in 1968. We have a fixed cost and the additional AUM's are the only way we can realize any return on our investment. This holds true for the involvement of the BLM in these projects.

We believe in multiple use and in the process have had our private land exploited in some instances. Our livestock should have the advantage of shade and the cool atmosphere along the streams. Comfort is a key to pounds of gain for livestock.

My support would go to the Alternate plan presented by the Nevada Grazing Board District N-1.

Sincerely yours,



Lloyd E. Shewmaker, Secretary
Salmon River Cattlemen's Assoc.

Comment Letter 4 5



MINING & MILLING DIVISION
POST OFFICE BOX 429
ELKO, NEVADA 89801
702/738-3496

August 17, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

Attention: RMP/EIS Team Leader

Dear Mr. Harris:

The following are Chromalloy Mining and Milling's comments on the Alternatives listed in the Draft Wells Resource Management Plan and Environmental Impact Statement.

The Preferred, Resource Production, Resource Protection, and Midrange Alternatives do not take the future resource needs of mining into consideration and therefore Chromalloy does not support them.

The basic plan of the alternatives are inflexible for future resource development of presently unknown resources. Designation of utility corridors is excessive. The mineral resources of the Wells RA are, to a large extent, unknown and it is impossible to designate access where it is not known whether or not a valuable resource exists. It is apparent that power plant development has taken precedence over mining.

The emphasis on improving grazing lands, land sales and wilderness designation will possibly hinder future mineral exploration and development.

Loss of important and economic access routes may result from the large scale land sales.

The only alternative that is not prohibitive to mining is the No Action Alternative and Chromalloy supports it. All access designations and land acquisitions are carried out on a case by case basis. It is the natural way for mineral development to proceed since the extent of the mineral resources are unknown.

The possibility of "wasting" unknown resources on designated access areas or by land sales that may never be used is greatly lessened.

Comment Letter 45

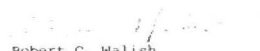
Mr. Rodney Harris
Elko District Manager (cont.)
Page 2


Without the push to sell large tracts of public land, more land is available for exploration and unencumbered mineral reconnaissance. Mining costs increase significantly due to surface damage payments, acquiring private access, etc. when operating on private land.

The No Action Alternative is by far the most flexible proposal. Mining activity is not additionally restricted. All developments proceed on a case by case basis according to their importance to the resource area.

Thank you for the opportunity to comment. Chromalloy would appreciate the opportunity to participate in any further planning in the area Chromalloy operates mines.

Chromalloy Mining and Milling


Robert C. Walsh
Manager
Nevada Operations


Sheila Miller
Environmental Liaison
Nevada Operations

Comment Letter 46



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

AUG 18 1983
Rodney Harris
District Manager
Elko BLM District Office
P.O. Box 831
Elko, Nevada 89801

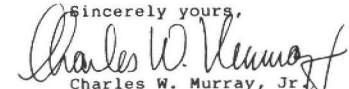
Dear Mr. Harris:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled WELLS RESOURCE MANAGEMENT PLAN, ELKO COUNTY, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2. Definitions of the categories are provided by the enclosure. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or PTS 454-8188.

Sincerely yours,


Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Enclosures (2)

Comment Letter 46

-1-

Water Quality Comments

1. The DEIS provides very little specific water quality data for the area. On page 3-32, the DEIS states:

Surface water quality varies within the Wells RA. From 1979 through 1982, BLM conducted a water quality survey which included sampling 39 streams and 15 springs during the high water flow, high temperature and low water flow periods. The results of the survey indicate that surface water quality is adequate for livestock watering and irrigation purposes. The suitability of surface water for domestic uses depends upon the location of the source.

This is not an adequate response to our scoping comments of October 22, 1982.

11

The FEIS should elaborate upon this information by comparing the water quality survey results with the state-adopted, Federally-approved water quality standards for the area. The Nevada Division of Environmental Protection should be contacted regarding the appropriate standards. Also, the FEIS should discuss any likely future changes to the water quality resulting from the preferred alternative and provide mitigation measures.

Air Quality Comments

1. The DEIS states (pp. 4-1, 4-2), "Impacts to air quality and groundwater are not considered to be significant and will not be discussed further."

11

The FEIS should substantiate that statement, especially with regard to mining activities.

General Comments

1. The FEIS should clarify what interim management measures will be in effect during the wilderness classification process.

The DEIS states that no controls on off-road vehicles will be in effect prior to wilderness classification. (p. 4-3). The FEIS should clarify whether this will affect the potential wilderness status of these areas.

Comment Letter 46

-2-

The FEIS should clarify whether access for mining, oil and gas exploration, or other development will be allowed during the wilderness designation process.

2. The DEIS notes on page 4-3 that a minerals survey by U.S. Geological Survey/Bureau of Mines will be done. The RMP FEIS and the subsequent wilderness EISs should discuss how this information will be used to modify the 159,881 acres identified as suitable for wilderness designation.
3. Please send our Regional Office a copy of the Wells RA Wilderness Technical Report to facilitate our review of the final EISs.
4. The DEIS recommends no further study of the Mary's River for possible inclusion in the National Wild and Scenic River System.

Specifically the DEIS states on page 4-2 that:

About 25 miles of the Mary's River are on this list and were analyzed by the Elko BLM and the Humboldt National Forest in a report titled Mary's River - Wild and Scenic River Evaluation dated December 1982. This report determined that implementation of the Mary's River Habitat Management Plan involving stream rehabilitation and the presence of 14 of the 25 river miles within the Jarbidge Wilderness Area would provide more protection and enhancement of the stream and its environs than would further study for inclusion into the National Wild and Scenic River System. Therefore, further study of the river would not have a significant beneficial or adverse impact and will not be analyzed further.

57

The FEIS should clarify why further Wild and Scenic study could not take place in addition to the River Habitat Management Plan.

Vegetation Comments

1. The DEIS does not present adequate information regarding how the proposed grazing levels under the RMP will impact the ecological range conditions.

42

The existing ecological range conditions are estimated in Table A2-2 (p. A2-6). That table shows the conditions as: excellent - 1%; good - 25%; fair - 54%; and poor - 20%.

4-97

42

The FEIS should include an additional map showing the distribution of these areas within each Resource Conflict Area.

There is apparently not enough information available at this time to determine ecological range conditions and trends (p. 3-25). In the absence of such important information, the FEIS should provide a "worst case" analysis of possible vegetation impacts resulting from each of the alternatives.

EIS CATEGORY CODES

Environmental Impact of the Action

LO--Lack of Objections

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

ER--Environmental Reservations

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

EU--Environmentally Unsatisfactory

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

Adequacy of the Impact Statement

Category 1--Adequate

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

Category 2--Insufficient Information

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

Category 3--Inadequate

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

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

Comment Letter 47

DEMAR H. DAHL
BOX 67
DEETH, NEVADA 89823

3) L.M.

COMMENTS BY DEMAR DAHL ON
DRAFT WELLS RESOURCE MANAGEMENT
PLAN AND ENVIRONMENTAL IMPACT STATEMENT

I support the sixth alternative
which is enclosed.

forments only

Comment Letter 48



DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET - ROOM 1316
SAN FRANCISCO, CALIFORNIA 94111

Mr. Rodney Harris, District Manager
Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

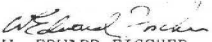
We have reviewed the Draft Resource Management Plan and Environmental Impact Statement for the Wells Resource Area, Nevada, and make the following general comment:

A small portion of the Wells Resource Area is subject to military overflights as it has been in the past. Historically, there have been no problems between the Air Force and the Bureau of Land Management concerning potential conflicts between military overflights and wilderness/recreation designations. We, therefore, concur with any of the alternatives your agency designates, provided no restrictions are placed on current military overflights.

As you know, areas suitable for military overflights are becoming increasingly scarce. Desirable characteristics include areas presently under Federal ownership, diverse topography, sparse population, and areas which lack heavy commercial activities such as mining. Therefore, the Air Force supports alternatives which dispose of the least amount of property, allow for the least number of transmission lines, do not allow for an excessive amount of commercial activity, and do not restrict military overflights.

We appreciate this opportunity to comment on this Draft Resource Management Plan and Environmental Impact Statement for the Wells Resource Area.

Sincerely,


W. EDWARD FISCHER
Deputy Regional Civil Engineer

Timberly, Idaho
August 19, 1983

Mr. Rodney Harris
Elko District Manager, BLM
Elko, Nevada

Mr. Harris,

Following are comments on the Draft
Wells Resource Area RMP/EIS. I am a
stockholder in the Salmon River Cattlemen
Assn., Inc., a livestock permittee. I enjoy
big game hunting and would consider
myself an outdoor enthusiast. But, the
Draft gives too much consideration to wild
life, to the detriment of livestock permittees.
The two-year lead time for land treatments
required by NDOW is unreasonable. Changing
existing fences to meet wildlife standards
is unacceptable. Fencing as a method of
improving riparian areas is unacceptable.
Riparian areas are generally in good to
excellent condition on the Salmon River
Allotment. I question the reliability of the
inventory and classification of the riparian
and aquatic areas on the Salmon River Unit.
This leads me to question the credibility of the
survey of riparian areas for the entire Resource
Area. Terrestrial wildlife habitat is in excellent
condition. Presently there exists more winter
browse than can be utilized by present big

①

game numbers. Strict compliance with
Standard Operating Procedure Number 9 (p. 2-32)
would be unacceptable. In the past, the
Salmon River Cattlemen Assn., Inc., has voluntarily
left strips of sagebrush when we sprayed
on our private range land. Sagebrush
reinvades created wheatgrass seedbanks faster
than we can afford to retreat the areas.
I feel that the scope of the areas
required for sagebrush habitat is way out
of line.

8

The Salmon River Cattlemen Assn., Inc., has
implemented voluntary cuts in use during
drought periods. We have 4,000 AUMs
in voluntary non-use which was to be
returned but wasn't. I would hope the
BLM would honor their prior agreements
by returning the AUMs after the implementation
of the RMP.

I believe in and practice the multiple
use concept. Some of the finest wildlife
areas in these United States are on the
Salmon River Allotment. The best of these
areas are largely on our private property.
We have never denied access or permission to
hunt on our allotment or private land.
Rockhounds camp on our private springs and
waterholes and flourish there. We are
happy to have all of this going on in
our midst for the most part. But the
BLM and the public must remember from

②

I have just read the Proposed Resource Management Plan for the Wells Resource Area. Due to other commitments I did not participate in commenting on the Wells DEIS, thereby not qualifying to protest the decision document. However, as an interested party and a taxpayer, demands some comment, whether it is considered or not.

It is totally unclear to us how rangeland can recover from historical overgrazing when the preference level for livestock of 379,279 AUMs were allocated before the enactment of PL 92-195. The current use of 288,934 AUMs with an 1.7% increase to 293,846 AUMs leaving only 85,433 AUMs below preference. "Most of the States Range Surveys carrying capacity was based on AUMs which were usable only for the purpose of livestock production. Wildlife AUMs allocated on a percentage basis of the total acreage in the geographic area." ¹⁾ Hence the allocation

1) Effects on Livestock Grazing (April 1974)
Elko Dist. Mgr. Feb. 27, 1974 (Appendix 1 - Jackpot)

of 379, 279 preference contained little, if any consideration for the vegetative resource, the wildlife requirements or wild horse needs. If indeed "areas exist that are in less than good condition," the cattle/horse ratio is evidence the offender is livestock, yet the district proposes to increase this use. ²⁾

It is also unclear what "continue to monitor wild horse populations & habitat conditions" would include. Do you mean to implement monitoring systems to determine utilization or do you mean the inventorying of numbers? Upon what data do you base the 550-700 numbers? The short term and long term management actions are grossly deficient. No mention is made of removing fencing that inhibits their free roaming status, no mention that future fencing will not occur where it will interfere with that free roaming behavior.

2) Wells. FEIS pg 1-5

I have just read the Proposed Resource Management Plan for the Wells Resource Area. Due to other commitments I did not participate in the previous planning documents thereby not qualifying to protest this decision document. However, as a concerned taxpayer, an interested organization I must comment on this document.

(Planning Criteria 2b (pg 1-3)

Should include critical wild horse habitat.

No mention is made of herd management plans, re-habitating wild horse habitat (i.e.) seeding of overgrazed lands as is proposed for livestock). Nor was wild horse habitat mentioned in areas considered for disposal. It is unclear what the \$90,000 in water developments would achieve, does it distribute horses more evenly or are they because of the extensive fencing for livestock that they are required?

WNOA is not reassured by the SOP will protect wild horse habitat when it comes to the fencing.

By the levels of comments in the FEIS it is apparent that livestock operators are not satisfied with 95% of the use and still want more. Despite the Elko ratio of 23 domestic livestock to 1 horse, the complaint consistently arises that there should be less, Elko having 38% of state cattle numbers and 6% of the horses ³⁾

3) Forty-Eighth North American Wildlife Conference.

It is appropriate to note that
Halogen, a native of Russia, was first
recorded near Wells, Nevada in 1934. ⁴⁾

⁴⁾ Sacred Cams / Ferguson

1

WNOA has reviewed the Proposed Resource Management Plan for the Wells Resource Area. It is clear to us that multiple use is literally applied to resources when the objective is dominant use by livestock. A token number of horses in the most productive ranges in Nevada and the promise to conserve wildlife habitat, while increasing livestock use on admittedly overgrazed ranges is not our idea of multiple use or resource protection.

Issue 1: Lands

There is no need for large disposal of lands as current laws are adequate to provide for community expansion. Is there any horse habitat in the 90,000 acres proposed for public sale, or are any surrounding land use areas?

Issue 3: Access

I commend BLM for seeking access to public lands.

Issue 5: Wilderness

WNOA supports wilderness as compatible with wild horses, recommendations

to Congress should include HMP's.

Issue 6: Livestock Grazing / Issue 7

It is hard to understand whether \$4,600,000 worth of range improvements are truly a benefit to the public, when in fact range improvements tend to cover up mismanagement and overgrazing.

It is appropriate to note in these comments that Kalogiton, a native Russian plant, was first recorded near Wells, Nevada in 1934. It doesn't appear that any lessons

from this plant's history of preferring disturbed sites, has been learned.

The 1974 study of the "Effects of Livestock Grazing, States most range surveyed carrying capacities were based on AUMs which were usable only for the purpose of livestock production, wildlife AUMs allocated on a percentage basis of the total acreage in the geographic area."

Presumably the preference of 379,279 livestock AUMs were based on the above and historical use. The FEIS States "Sacred Cows" / Ferguson, 1983

3

50% forbs brush & grasses.

that "areas exist that are in less than good condition & producing livestock forage below potential." The same study states only one district (Carson) allocated forage to wild horses and we presume that NDOW reasonable numbers for wildlife have not occurred; then how can BLM propose a 1.7% increase to livestock, furnish habitat for viable numbers of horses and reasonable numbers of wildlife and still believe the range will improve in the future? On what data do you base a horse population of 550-700 horses? The Elko BLM District has 38% of state cattle numbers and 6% of the state horses;²⁾ presumably the livestock industry and BLM would rather "establish population levels by determining minimum numbers necessary..."³⁾ to get under the wire of multiple use. The facts are indisputable, BLM's wild horse numbers have no scientific basis, but rather an arbitrary figure that least aggravates the livestock community.

2) Forty-Eighth North American Wildlife Conference ISSN

3) Wells FEIS planning criteria (1-6)

It is unclear what "continue to monitor wild horse populations & habitat conditions" implies. Do you mean to implement specific studies on utilization, does it mean the separation of utilization data between horses and cattle; or does monitoring mean censusing?

The planning criteria for wild horse management is woefully inadequate and further supports our claims the BLM has no plans to manage horses except through reductions. No mention is made of eliminating hazards to wild horses, e.g. fencing; nor the use of horse management to improve wildlife habitat. Nor do we see any recommendations, although allowed by BLM regulations, of limiting livestock use in critical wild horse habitat. It is disgusting to see academics continually implying that wild horses compete for livestock forage but not the other way around.

Issue 8: Wildlife

WFOA supports reasonable numbers of wildlife, but certainly we don't want

this to represent only big game species. In your planning criteria (1-6) you propose chaining, burning, and seeding to desirable browse species. However, experience has shown that unless WOOD recommendations are used on the percentage removed or type of vegetative conversion use to encourage forbs, brush, and grasses, little benefit to wildlife results. This vegetative conversion must be more specific in how this will be done to benefit wildlife.

~~Issue 9:~~ Aquatic Habitat & Riparian Habitat.

WNOA has reviewed the FEIS for
Wells Resource Area which mandates
some comment.

BIM consistently quotes the
"extravagance" of tax dollars for
wild horse management and
protection and in the same
breath in most impact statements
proposes the "wise" use of tax
dollars to improve the range.

It is hard to determine whether
\$4,600,000 of range improvements
are truly benefitting the resource
or the public or just a cover up
for mismanagement and over-
grazing.

Comment Letter 49

where their food comes. Beef cattle turn the arid rangeland into a valuable resource. When we consider the balance of multiple uses of our public land we must credit the cattle industry for the contributions it makes to the well-being and stability of our collective lives and to the whole economy.

Thank you for considering my comments.

Respectfully,

Dan H. Snowmaker

Dan H. SNOWMAKER
Rt 2 Box 49
KIMBERLY, IDAHO 83341

Comment Letter 50

City of Wells

OFFICE OF CITY CLERK

279 Clover Avenue WELLS, NEVADA 89835 Phone 752-3355

August 17, 1983

MAYOR
~~BOYD MITT~~
Superintendent of
Finance and Revenue
MAYOR
CARRIE FITCH
City Clerk

COUNCILMEN
STEVEN R. RANSON
Supt. Public Safety
CARL WEDDLE
Supt. Street and
Public Works

CHARLES HIGGEL
Supt. Parks, Health
and Recreation

LYNDA BELLER
Supt. Water, Utilities
and Sanitation

DON MARTIN
City Manager

Edward F. Spang
United States Department of the Interior
Bureau of Land Management
Nevada State Office
P. O. Box 12000
300 Booth St.
Reno, Nevada 89520

Dear Mr. Spang:

The City of Wells would like the Bureau of Land Management to keep the Wells Resource Area the way it is.

The people of Wells have a good working relation with the ranchers when it comes to sharing the land, cutting wood and using the land for recreation.

The ranchers have a direct impact on the economy of the City of Wells.

The people of the City of Wells feel you should retain the land in the Wells resource area as it is so the people of Wells, the ranchers and the rest of Nevada can continue to enjoy the land and have access to it.

If you must change part of it, we would ask that you do it on a case by case basis and consider keeping the areas closest to Wells - The Spruce Mountain area, Clover Valler, Moore etc. as they are, as these are the areas that most directly affect the economy and the people of Wells. Also the Metropolis area.

Sincerely,

Lynda J. Beller
Councilwoman
City of Wells, Nevada

Up-to-Date Airport Facilities • Highways U.S. and U.S. 93 • Three Main Line Railroads

4-101

PLEASANT VALLEY GRAZING ASSOCIATION, INC.
 1112 Main Street
 Buhl, Idaho 83316
 August 19, 1983

Rodney Harris
 Elko District Manager
 P.O. Box 831
 Elko, Nevada 89801

Dear Mr. Harris:

We would like to go on record as opposing the Wells Resource Management Plan and the Environmental Impact Statement. None of the alternatives you presented are acceptable to us. We would endorse the alternative plan submitted by the Nevada Grazing Association.

We see no need for wilderness areas as you have proposed. Some of the areas are criss-crossed with roads. There is no access at all except through private land which would cause hardship on the private land owner. The plan also deprives livestock of necessary watering holes.

Sincerely yours,

Bill Brake
 President

Dale R. Andrus Associates

Specialists in Governmental Affairs Land Energy Minerals Livestock Grazing
 Contacts in Washington D.C. All Points West

August 17, 1983

Rodney Harris, District Manager
 Attention: RMP/EIS Team Leader
 Bureau of Land Management
 P.O. Box 831
 Elko, Nevada 89801

Dear Mr. Harris:

First, let us commend you and your staff in coming to grips with a very complex natural resource program area. It appears that you have treated all of the identified issues, selected a viable preferred alternative, and outlined a very realistic resource management program. While we do not agree with all of your assumptions and conclusions, your analysis in general is sound and treats all of the user groups fairly based on information available.

Recognizing that the federal agencies have some flexibility in selection of the format to be used in preparing an Environmental Impact Statement (EIS), we support your approach in dividing the Wells Resource Area into sub-units having similar resource uses and conflicts (page 5-1, paragraph 2). It definitely facilitates review of the document by its readers. However, the term selected Resource Conflict Areas (RCA's) implies that all users and/or uses in the sub-units are in conflict, which we both know is not true but other groups or individuals with a single use background may conclude that they are. Therefore, it is suggested that you call them Resource Use Areas (RUA's) which is more descriptive of the situation as it exists on the ground and does not wave any red flags. It also eliminates any conflict with or misunderstanding about designated Resource Conservation Areas (RCA's).

Other comments are in page sequence to aid you and your staff.

PAGE 1-5

Issue 4: Item 1, a.: It is suggested that you add an additional item or change it to read "Develop those areas where development is necessary."

Comment Letter 52

Mr. Harris, page two

to protect other resource values." This would provide five evaluating criteria.

Item 2. f.: "Harassment of livestock or damage to authorized private property" should be added.

PAGE 1-7

Issue 6: Item 1. a.: This should be changed to read, "Develop water resources that enhance management of the rangeland resource and accommodate the needs of the animals which can reasonably be expected to use the water."

Issue 7: An additional criterion should be used, "Remove wild horses and/or relocate to protect fragile public resource values, i.e., ACEC, endangered plants, etc." Wild horses are not sacred cows.

PAGE 2-2

Under Selective Management Categorization par. 2, we suggest dropping the word unsatisfactory. "On I category allotments, the objective is to improve current conditions." In fact, the word satisfactory in the preceding statement concerning M category allotments should also be removed. Then both definitions would be more factual. I recognize that these definitions were prepared in Washington, D. C., but they too have been known to be wrong.

PAGE 2-23

You state under Issue 6 that livestock grazing that short term management actions affect will include 35,000 acres by seeding, 27,000 acres by prescribed burning, and another 1,500 acres by spraying for the entire Wells Resource Area. If these figures are correct, we are very concerned about the Mary's River program set forth in Table 2-5. We cannot believe that 7,000 acres is the entire amount of federal acreage identified for vegetative manipulation (prescribed burn). We firmly believe that 20 to 30,000 acres can be improved by applying different methods of vegetative manipulation on the Rafter Diamond Ranch alone. Selection of the proper method would improve the rangelands for both livestock and big game animals as well as the watershed. Because we feel very strongly about this issue, we are requesting an opportunity to sit down and discuss this matter with you at your convenience, but before the RMP/EIS is finalized.

Comment Letter 52

Mr. Harris, page three

PAGE 2-33

There is a typographical error in the first line: "overflow."

PAGE 4-3

Issue 6: Item 2: We would suggest you change it to read, "All livestock grazing systems will be designed to provide for the physiological needs of key vegetative species." Proper season of use in many instances is going to be established by professional judgments which will vary because of the many natural variables. The assumption would be more definitive as well as obtainable.

Issue 8: This should be modified to eliminate placing foxes in charge of the hen house. "1. Reasonable numbers of wildlife as determined by the NDOW and agreed to by BLM includes random use by wildlife of both public and intermingled private lands." An agreement exists between BLM and the Colorado DOW along this vein if a precedent is necessary. BLM as the land manager should arrive at wildlife numbers jointly with a wildlife agency as they do with the livestock operators. If you don't, you may have bighorn transplants in downtown Reno and mule deer hedging the shrubs in downtown Elko.

PAGE 4-4

Other assumptions Item 2: This is a total cop out and it is not entirely compatible with conclusions reached in treatment of the minerals program in any one of the alternates. Even the no action alternate states in part that "Time of year restrictions to protect sage grouse and other species are not significant in the other five RCA's and the Wells Resource Area as a whole." Time of year restrictions for terrestrial wildlife habitat require identification of significant habitat areas, fawning and calving grounds, strouting grounds, etc., so that the mineral and energy industry can plan its work in advance. It appears that a very small portion of the Wells Resource Area as a whole would be restricted at any one time. Therefore, we suggest that Item 2 be rewritten accordingly. The only real adverse limitation on the minerals industry will be withdrawal and designation of the WSA's. The time of year restrictions on the minerals industry are no more adverse than season of use on the livestock industry or hunting seasons on the sportsman.

Under "Determination of Significant Impacts" Issue 2: Corridors: an additional impact should be added.

4-103

18

58

42

2

Comment Letter 52

Mr. Harris, page four

3. The designation or identification of any transportation and utility corridor will adversely affect private and public land values in the long term and is a significant adverse impact.

We have two other general comments to make before summarizing our statement. The Impact Tables prepared for each alternative in Chapter 4 capsulize very precisely what is going to happen but the supporting narration in the "Preferred Alternative" leaves the reviewer in a mental quandary. It is suggested that a statement under each Issue be complete instead of a referral statement such as "Impacts are the same as the Resource Production Alternative." It is felt that this would help to clarify and summarize the proposed actions being presented in the document, in the reviewer's mind.

While we don't question the need for additional administrative access routes in the northern portion of the Mary's River area and on a case by case basis may support access for the general public, we will request that the state and federal agencies assume responsibility for damages due to loss or vandalism of property and enforce seasonal closures as well as police the hunters and fishermen. After all, many sportsmen say that road closures are necessary to enrich the recreation experience.

In summary, we assume that the general comments and suggestions regarding the assumptions and impacts, if considered favorably, will be incorporated into the document. We also request that time be made available to meet with you or Charles Boyer to discuss the location and amount of acres being considered for land treatment in the Mary's River Resource Use Area (RUA).

Again, we wish to commend you for an outstanding job and the opportunity to comment. We look forward to meeting with you in the near future.

Sincerely,

Dale R. Andrus
for Jim McCormick
Aurora, Colorado
Owner, Rafter Diamond Ranch
Deeth, Nevada

DRA:tom
cc: Charles Boyer
cc: Jim McCormick
cc: Bob Garrett

4-1014

Comment Letter 53

OFFICE OF THE DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF AGRICULTURE
WELLS DISTRICT OFFICE
ELKO, NEVADA 89801

August 10, 1983

Rodney Harris
Elko District Manager
P.O. Box 831
Elko, Nevada 89801

Dear Rod:

We appreciate the opportunity to send you our comments and recommendations relating to the Draft Wells Resource Management Plan and Environmental Impact Statement. The Nevada Department of Agriculture comments and recommendations are as follows:

39

Long Range Planning and Stewardship. The proposed RMP is a long term proposition. Over the 20 year span envisioned in the plan, many changes will occur in BLM personnel, ranch ownership and management, local needs, local economy, national emphasis and priorities, etc. It is our recommendation that a Stewardship Committee be established to provide long range objectivity, direction, continuity, stability, flexibility, and local acceptance to resource management in the Wells resource area. A recent solicitors' ruling has established that the Experimental Stewardship Program does not terminate in 1985 but goes on indefinitely. Now is the time to establish such a program in the Wells area and other resource areas. The existing Experimental Stewardship programs have demonstrated the success of the concept and have developed the operating procedures that assure success. A Stewardship Steering committee can provide that necessary mix of stability and flexibility that is necessary to success of a long range plan.

Checkerboard Area Needs. The checkerboard area requires a level of special effort to cooperate with the private land owner. Land exchanges where requested by the private land owner should be expedited in order to establish larger ownership blocks which will provide for better or easier management. Range improvements should be allowed on a cooperative basis so that projects such as shrub control, reseeding, and fences can follow natural terrain feature. This will avoid that artificial appearance created when such treatments are required to follow section lines. This will also provide lower cost and more effective treatments.

59

In the past where unfenced checkerboard areas exist the private land owners have been required by the BLM to sign exchange of use agreements which abrogate most of their personal property rights. We recommend that this practice be abandoned in favor of cooperative management agreements where the livestock owner is

Comment Letter 53

59 charged prorata based on the ratio of private and Federal AUMs' actually grazed.

Land Disposal. We recommend that the BLM dispose of 93,000 acres. The land needed for community expansion should be allowed under the public purposes and use act, Agricultural lands through the DLE program or sale and other lands through sale.

Corridors. Short and Long-Term Management Actions: Designate reasonable width transportation and utility corridors along existing rights-of-way. Require use of these corridors for future developments wherever feasible. New corridors will be considered for designation on the basis of economic justification, proximity to existing corridors and complete environmental studies of alternate routes. Livestock grazing and Desert Land Entry should be allowed in the corridors where feasible.

Wilderness. Implement the no action alternative. These lands should not be managed as wilderness until they are finally declared wilderness.

Livestock Grazing. Objective: To increase the yield of useable livestock forage sufficiently to meet at least the full grazing preference demand on all allotments where the potential exists to sustain this level of use and the livestock operator is willing to actively cooperate in planning and implementing the improvements and management actions necessary to meet this objective.

A. Short-Term

33 Review the categorization procedure described in the RMP/EIA document and, after consultation with the grazing operators, re-categorize the allotments, placing greater emphasis on range condition, range trend and productive potential and on the desires of the livestock operators.

Develop grazing plans for those allotments where extensive improvements and/or grazing systems are needed and practical, and where the livestock operators are willing to participate. Plans will consider all uses of the allotment and will include the treatments and practices needed for wildlife habitat improvement and other uses as appropriate.

Install needed water development projects on those allotments having treatable livestock distribution problems.

Install monitoring studies on allotments where grazing plans have already been implemented and are functioning satisfactorily and on allotments where no grazing plans or significant improvements are anticipated.

B. Long-Term

Install planned livestock and wildlife improvements and management practices over a period of years to avoid a sudden, massive impact on habitats and livestock use. This will also facilitate private investment and provide a more uniform distribution of federal funds.

Establish monitoring studies on allotments where major changes in livestock distribution patterns have resulted from the implementation of grazing plans.

Make adjustments to grazing systems and/or livestock numbers as indicated by the results of not less than 5 years of monitoring studies.

Comment Letter 53

6 Wild Horses. Reduce horse numbers to 1971 levels and monitor future years numbers to maintain the 320 head of horses inventoried in 1971. Remove horses from private land if so requested. Do not allow horses to increase above 1971 levels in any herd use area or to expand to areas where they did not exist prior to the 1971 Wild Horse Act.

3 Wildlife. It appears that the wildlife numbers should be reviewed with the State Department of Wildlife to eliminate errors in historical and projected use.

33 Riparian Habitat. Include in allotment management plans provisions for improvement of riparian habitat. Provisions for improvement should be those agreed upon by all users. Fencing should be de-emphasized because it is costly and detrimental to all users.

Woodland Products. Harvesting of pinion and juniper should be encouraged and planned to improve wildlife habitat and forage for beef production.

18 Selective Management (M-I-C). It is our experience that no allotment is totally uniform and so it is a matter of judgement when they are placed in the different M, I and C categories. It is recognized that there is room for improvement on every allotment. Therefore, we recommend that placement of allotments in one of the categories should not be inflexible. Where the livestock operator objects or wishes to have it in a different category his reasonable desire should be allowed.

Language. One of the RMP Team Leaders mentioned to me that some time was spent by the BLM on eliminating objectionable words/wording from the Draft. They forgot one. The label, Resource Conflict Area, RCA, is quite negative and puts the land user on the defensive immediately. A suggestion to change it to Resource Use Area sounds better.

One last comment on the titling of the Alternatives. People might accept the document better if the Alternatives were labeled I, II, III, ... By labeling their favorite as the Preferred Alternative, they, the BLM, are setting themselves up for more criticism along the lines of, "The BLM already has their mind made up and these comments and public scoping don't mean a thing". EIS's should be as objective as possible.

I wish to commend you and the team for not including the so called "no grazing alternative" because this would have upset the local population to a much greater degree. It certainly would not have been a viable alternative here or in any statement addressing livestock grazing.

Sincerely,


Thomas W. Ballou
Executive Director

TB:pt

cc: Ed Spang

4-105

Comment Letter 54

Comment Letter 54

Mr. Gene L. Drais
RMP/EIS Team Leader
Elko District, BLM

31.05.83.

Thank you for the WTR and Draft EIS for Wells RA. In order to submit my comments I would appreciate receiving supplementary information on the following:

Goshute WSA.

64

I. I am puzzled that you advocate periodic motorized travel in a proposed wilderness area even after designation. By the spirit of the definition these two do not go together. Here I refer that the biologist will be allowed to travel on W-25 on their regular visits with their motor vehicles even after the area are made wilderness. It is absurd you demand on one hand that non mechanical means are used for one time spring improvement but allow periodic motorized vehicular travel for biologists! To allow me to comment on this in my submission please send additional information, detailed.

- a) A copy of the map. The report maps do not show the Christmas Canyon by name, so on this map please mark this and also location about the trail, the construction site for blinds, nets traps etc. *
- B) To what extend you currently enforce and police that the biologists do not leave trash, litter and eyesore construction behind?
- c) After wilderness designation will these enforcements tightened from its present level?
- d) Will the biologist allowed the use of W-24 (Map 6 in WTR)
- e) Please send a copy as to the Wilderness Management Policy pertaining to permitted extent of impairment. Both as the regulations are applied now and in the future. (by the scientific community)
- f) What is your opinion at the trapping sites condition at present? Satisfactory? This is a key question!
- g) In wilderness you do not allow a backbacker to cut down a branch from a living tree but you readily permit this done at in large number of lining branches by biologists.
- h) Why do you allow biologist travel by vehicles in wilderness but not wilderness horse gatherers to transport their traps? (p.43)*
- i) Who and at what position level in BLM organization determines who qualifies as biologist and can use trucks inside a wilderness?

The reason I dwell in depth on this issue is the principles involved I consider it a test case for future applications. The scientist are notorious for their disregard to ecology outside their discipline. The government agencies' issuing permits without discretion as long the request is made by an "academic" or institution.

* Also the distances the Biologist are allowed to travel with their trucks, (inside the wilderness Area) on W-25
** Why can not the trapping equipment transported by helicopter?

On my travels in the backcountry I have many times seen trash and equipment left behind which on later inquiry turned out to belong to some biologist or study group. I have seen the results like extensive alpine meadow bulldozing in a National Park with the persons walking away without restoration of any kind. In Ely a permit was issued a few years ago to a scientist by Humboldt National Forest Supervisor to cut down a 4900 year bristlecone pine near Wheeler Peak and as I heard afterwards made ashtrays out of it! This researcher cut down the known oldest bristlecone pine in whole of Eastern Nevada! I could cite dozens of specific instances where extensive damage bordering to arrogance and vandalism has been done by researchers.

I wish that in your reports something would have said how and to what degree you plan to enforce the regulations in established wilderness areas. In my travels on BLM lands in Nevada I note many unauthorized uses and a lack of enforcement of existing regulations. In view that it will be 1993 before the Congress will act and with the lack of protection at present, the question comes up how much wilderness will be left by 1993 in the WSA's so designated?

Sincerely, *Harry Melts*
Harry Melts
Box 668
Oreston, B.C. V0B 1G0

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Nevada State Office
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Page 2

open pit methods. Probably most of the recent staking in the GRA was directed toward targets of this type.

In the same report at page 24, the authors set forth the fact that they believed the quality of data pertaining to mineralization in the area is low and its quality is correspondingly low, but that their level of confidence in the geological data is high, but the level of confidence in mineralization data is low.

The GEM report also contains recommendations for additional work:

Because of the apparent lack of previous prospecting in the interior of the mountains, geological reconnaissance for mineral occurrences is recommended. To supplement this a geochemical survey should be made with at least sampling of sediments in streams and washes all around the edges of the mountains. (page 30)

68

Duval believes the conclusions reached for the Bluebell WSA contained in the Wells Wilderness Technical Report dated April 1983 does not take into account the final report prepared by Great Basin GEM Joint Venture dated May 6, 1983, referenced above. The Technical Report states:

1. There is no active mining in the WSA.
2. Minor exploration has taken place, but no mineral development has occurred within the WSA and no significant ore deposits are known to exist.
4. The great majority of the WSA has low mineral potential for all commodities. (page 22)

68

As noted in the Technical Report, with wilderness designation the area would be segregated from all forms of mineral entry with the exception of valid existing rights. In light of the GEM final report and the recommendations for additional work contained therein, and the lack of information at this time

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Page 3

68

with regard to mineralization in the area, most particularly in the abundant carbonate rocks which are known to exist in the area, we would like to see the period for comment be extended until such further information can be obtained and made available. In the alternative, we would suggest the resource production alternative be implemented, or nondesignation take place.

Should you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,

VARGAS & BARTLETT

Linda A. Bowman
Linda A. Bowman

LAE:dm

801-108

RENO, NEVADA PUBLIC HEARING TESTIMONY

57. Paul Hartley, District Geologist, Texas Gulf Minerals and Metals Company

68 "Within the South Pequop Wilderness Study Area the north half of Area A posed moderate potential for low-grade phosphate reserves, and high potential for carbonate-hosted lead, zinc and silver deposits throughout the Wilderness Study Area within the middle to late-Paleozoic rocks; moderate to high potential for carbonate-hosted lead, zinc and silver deposits exists within ninety percent of the Bluebell Wilderness Study Area; and moderate potential for low-grade gold systems is also present, but over a much more restricted area, primarily Area B."

To the south, within the Goshute Peak Wilderness Study Area there is excellent potential for Alligator Ridge-type gold occurrences -- these are low-grade gold deposits -- within Areas B and C and moderate to high potential for carbonate-hosted lead, zinc and silver deposits present within the remaining areas to the west."

58. Rose Strickland, Chair, Public Lands Committee of the Sierra Club

40 "In the EIS and draft plan I did read the section in Chapter 3 that has to do with mineral development. There was nothing in there about gold at all identified. I think it was on 3-15. It identified a number of critical or strategic minerals that may be found in the Wells Resource Area and gold was not mentioned."

59. Bob Warren, Executive Secretary, Nevada Mining Association

69 "Now, you have five or six usable and important necessary access roads in the Bluebell WSA; you have at least four according to geologists who have been in and out of the area and reported to me in the South Pequop area; and three not-so-great roads but accessible roads for purposes of prospecting and access for the general public for recreational activities, as well as cattlemen, in the Goshute area."

"Now, the Mining Association has responded to this, we put together a team of nine of the outstanding geologists or exploration firms in the Reno area. That means they are nine of the outstanding in the nation because we have the top exploration firms and talent now in the United States in the Reno area.

68 And they have further reviewed and added some first-hand on-the-spot information, as you heard earlier from the gentleman who spoke first. And, they have found -- reading from our summary of this -- the South Pequop area the gem rating is slightly low based upon exploration data by Freeport Exploration and others.

They note that the bulk of the mountain range is Paleozoic with favorable stratigraphy pervasive (ph) host rocks. And, this is something that has not been given proper attention in the gem report."

72 "But, the Bluebell, as was pointed out, is a high potential for carbon-type disseminated gold mineralization."

73 "The absence of claims is no indicator of lack of mineralization under modern day geologic methods."

69 "You realize that a road merely needs to be a way of egress, in and out, and it doesn't have to be maintained even. According to the Interior Board of Land Appeals it can be maintained merely by driving in and out."

60 "On page 1-3 of your document you indicate that there is a criteria set up for the sale and disposal of public lands, including minerals. But, all of the information that we've received from the federal Administration -- and from Congress, as far as that's concerned -- indicate that there is no intent whatsoever to sell the minerals."

74 "You pointed out the user day benefits that you estimated might take place under wilderness designation. You did not, and you should quite definitely, point the user day benefits for vehicle-related activity, vehicles related to recreation that would be foregone, or that is presently enjoyed but would be foregone under the wilderness designation."

". . . It states: "Mineral development would not be adversely impacted because of wilderness designation."

75 That is a startling statement, it's a totally uninformed statement. Not only are the mining companies unable to mine the wildernesses, as we all know, but it is virtually impossible because of lawsuits that would be brought by the Natural Resources Defense Council and others and the heavy regulatory costs that would be imposed to mine anywhere near a wilderness."

60. Dave Hornbeck

76 "This is such a miniscule difference that I do not discern a valid reason for not going with the entire resource protection versus the preferred alternative, especially where. . ."

WELLS, NEVADA PUBLIC HEARING TESTIMONY

61. Les McKenzie, Consultant for the N-1 District Grazing Board

69 ". . . cherry-stem roads in two of the areas should have eliminated them from consideration on the basis of size and naturalness."

74 "No mention has been made of the adverse effect wilderness designation would have on persons who utilize motor vehicles to carry them and their belongings into the areas to hunt, gather pinenuts, cut wood, cut Christmas trees, observe wildlife, study nature, look at fossils or carry out other recreational pursuits, for which the use of the motor vehicle is incidental but necessary for transportation. These are evidently the 1,750 days of existing use shown on page 3-20 of the report."

77 "There is, by the way, a considerable difference between the estimated visitor use days shown on this document and those contained in the management situation analysis."

18 "I feel that your categorization process was faulty. There was no consultation with the affected livestock operators in the assignment of categories, and the most important criteria of all, range condition, range trend, watershed condition and climax potential, were all lumped into one simple catch-all factor."

5 ". . . using the three to five year average license livestock use figure as a basis of comparing existing allotments and reliable grazing levels with levels anticipated under the various alternatives, is misleading."

8 "A case in point is the adoption of the procedures specified in the western states sagebrush guidelines as the criteria to be followed for in the alteration of sagebrush areas. Recent research findings indicate that these guidelines may be overly restrictive and suggest that some sagebrush modification may actually be beneficial to sage grouse."

3 ". . . the reasonable wildlife numbers indicated in the appendix are not really realistic. If these are the numbers Nevada Department of Wildlife gave you, they should be thoroughly reviewed. The doubling of wildlife numbers in this area is absolutely not realistic."

62. Von Sorensen, Rancher

69 "I feel that these designated study areas are not truly representative of wilderness criteria. They are traversed by various roads that we have used and maintained over the years."

63. Dick Roth, Flying S Land and Cattle

5 "We consider the three to five year projected use as arbitrary and unscientific in that it just lumps what has been over the past for all the ranches, without consideration for any individual ranch."

64. Marta Agee, Twin Meadows Ranch

78 ". . . we feel that the Bad Lands area has real problems for potential wilderness. Mainly, it is a small area, there's not many acres involved, and the strip through the middle that is really ideal for wilderness is so very narrow and small, you could put very few people in there to adequately have a really worthwhile wilderness experience. We've boated that river. There are two or three camping places where you can spend the night, and if you make that a wilderness area where there are only three or four ideal camping spots, you can't manage with that few of a -- with those few of camping spots, adequately from an Elko office, to staff it out there. It just seems totally impractical."

79 ". . . if you add more people to make it wilderness, then you add the bighorn sheep, you're practically adding two uses that are going to conflict."

80 "The Bad Lands area is a prime wintering area for deer. So, if you add your bighorn sheep into that you're going to probably lose some of your prime winter habitat for your deer."

61 "In one part of the document we refer to the streams along the wilderness area, downstream from our place, the Twin Meadows Ranch, down to the

61 | Boies Ranches, and that's described as having some of the finest habitat
-- streamside habitat -- in the state. If you look to your maps, you'll
see a conflict immediately. It is listed as being poor. It can't be
both, and yet in the document it is described as both."

51 | "The suggestion in the document that existing fencing should be modified
for wildlife uses seems really rather -- like an impractical use of very
limited improvement money. We feel that what fencing is out there, let's
use it like it is and change the standards for new fencing."

3 | ". . . I am appalled at the wildlife figures where they are projected to
triple and quadruple wildlife."

65. Steven Boies, Boies Ranches

7 | "Another concern is the miles of proposed fencing and most important, who
will maintain those fences."

3 | "I question the statistics cited for the Salmon Falls, O'Neil Area. On
page A3-2, titled big game numbers, existing numbers are listed at 6,900.
You have listed a reasonable number at 19,700 deer. I feel this
reasonable figure of 19,700 is highly inflated due to the scarceness of
suitable deer winter range."

66. Demar H. Dahl, Rancher

5 | "Suspended non-use, or those areas temporarily suspended for one reason
or another, but always there with the promise of being activated some day
are not mentioned in the Wells draft. More serious than the deletion of
the suspended non-use, however, is the Bureau's replacement of active
preference with the three to five year average use."

67. Dale Messner, Salmon River Cattlemen's Association Member

3 | "I do feel like some of the others have said, in their doubling and
tripling of wildlife, they are expecting -- they're giving wildlife an
unfair advantage of which there is not enough winter range. . ."

68. Robert Watt, Salmon River Cattlemen's Association Member

83 | "In the economic impact of Elko county, it is not considered very well in
this EIS at all, except on a per capita personal income, and since
livestock only represents 6 percent, it's considered almost
insignificant. I don't think that is true because through the expenses
that are expended through the livestock industry and multiplied and
rippled through the economy, not only in southern Idaho but throughout
the Wells RA and Elko county, it has a considerable impact."

84 | "These costs represented in here were quite misleading, and I've got a
few incidences in here, but basically on this whole problem, price makes
the big differential, and if you put 1982 prices and use the same cost on
this figure, you'd come out with approximately a \$9 loss no matter what
you do. . ."

85 | "Although in this statement, the economic factors involved show that we
made \$25 a head in one statement, and \$70 in the other, per thousand cow

85 | herd. Now, any banker that has been with the ranchers the last three or four years knows that some of these factors are not quite true. . ."

62 | "You've got a decrease of \$54,000 for no action taken. Under maximum production the \$572,900 per year loss you had under the medium range in preferred. You have almost the identical reverse increase. I think these are quite capritious numbers. That's an 80 percent increase over present. I don't believe those are going to happen over the short-range term."

51 | "In University of Idaho studies, they utilized where - increased migration areas where they used smooth wire fence on the bottom 18 inches, they found that you could decrease your cost by using only this in migration areas where it was known that animals such as antelope and deer trends -- mainly antelope is what we're dealing with with the smooth wire."

63 | ". . . Red Band Trout is nothing more than a small mutant trout. . ."

69. Ray Bedke, Rancher

4 | "Also, the off-road vehicles. I feel that these need to be coralled into certain areas, perferably not Goose Creek because they create so much of a -- oh, I'm trying to say -- washes and gullies and all of these things so readily. . ."

1 | "Our operations are geared around those meadows and if we don't get them out, those cattle off those meadows to where we can raise the winter forage, we're through anyway, and June 1 is not the time to go out, or even May 15th."

3 | "I was a little concerned about the numbers of wildlife that is projected for our area. I don't feel that this is realistic inasmuch as the critical area for those animals is the winter range. . ."

70. Walter Winchell, Rancher

5 | "This three to five year average, I don't think is a fair way to figure licensing. . ."

51 | "In one area I have, it's considered critical to deer and antelope range. And if you take your criteria you showed in the book for deer and antelope and throw those two fences together, you've got a fence a maximum of 38 inches high, and it's got to be at least 16 inches off the ground, and essentially all you got is a little bit of fence there left. You haven't got anything, essentially, to turn cow anymore. . ."

71. Craig Spratling, Rancher

5 | "One of my main concerns is your livestock grazing based on a three to five year use."

3 | "Another thing I'd like to mention is the increase in the big game. I think these figures are quite unrealistic under the doubling of the mule deer population and the quadrupling of the antelope numbers."

51 "Another area I'd like to mention is these new fencing standards. I totally disagree with them. I agree with the last speaker; if you have our ranges and antelope and deer range together, and if you have a fence 16 inches off the ground and only 38 inches high, that sure isn't going to do it."

8 "The last topic I'd like to mention is that vegetation manipulation would have to be done according to the western states sage grouse guidelines, and also in cooperation with the Nevada Department of Wildlife. I think these guidelines are way out of line."

72. Loyd Sorensen, Rancher

69 "Now, coming to wilderness. We have very few areas in the Wells resource area that would fit the wilderness criteria that they set up, and in order to get by with the acreage, you had to cherry-stem these mountains to get the acreage that was required for a wilderness area."

73. Herbert Uhlig, Rancher

9 "As I understand, when this program was to be taken into study -- I can't recollect, but I think a letter was sent out to each permittee stating that representatives will come and make this study and they will contact each permittee to discuss things with him about the methods that they use. I wish to state here tonight that that -- on my part, it's never been done."

CHAPTER 5

REFERENCES

CHAPTER 5

REFERENCES

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APPENDICIES

1 THROUGH 7

PREFACE

Table A-1 is included as updated information to Table 2-1 of the DEIS.

Table A-2 is included as updated and revised information to Appendix Table A3-1 of the DEIS.

Tables A3-A6 are included in response to comments requesting additional clarification of range information.

Table A-7 shows the final ranch budgets which update the draft budgets in Table A5-1 of the DEIS.

TABLE A-1

GRAZING ALLOTMENT DATA BY RCA

CHERRY CREEK RCA

<u>Allotment</u>	<u>Public Land (BLM) Acres</u>	<u>Other Federal, State, County Acres</u>	<u>Unfenced Private Acres</u>	<u>Total Acres</u>	<u>Existing Periods of Use</u>	<u>Grazing Preference AUMs</u>	<u>Average 3-5 Yr Licensed Use (AUMs)</u>	<u>% Grazing Preference Used</u>	<u>Category</u>
Ruby #9	18,831	1063	155	20,049	3/1 - 4/31 & 11/10-12/31	810	646	80.0	M
Bald Mountain	31,283	0	0	31,283	6/1 - 9/30	1,173	818	69.7	M
Currie	147,866	0	3852	151,718	4/1 - 2/28	4,687	4,461	95.2	I
North Butte Valley	31,001	0	207	31,208	5/1 -11/30	1,645	682	41.5	M
Maverick	38,142	0	35	38,177	5/1 - 8/15 & 11/10-12/31	1,864	1,106	59.3	I
West Cherry Crk.	62,990	0	875	63,865	4/16-10/31	2,661	2,661	100.0	I
Ogders	<u>25,319</u>	<u>0</u>	<u>517</u>	<u>25,836</u>	4/16-10/15	<u>1,596</u>	<u>1,190</u>	<u>74.6</u>	<u>I</u>
TOTALS	355,432	1063	5641	362,136		14,436	11,564	80.1	3M, 4I

MARY'S RIVER RCA

Hot Creek	17,092	0	1,052	18,144	4/1 -11/30	4,163	4,137	99.4	M
Anderson Creek	23,367	0	1,869	25,236	4/16-11/30	5,467	4,667	85.4	M
Stag Mountain	37,793	0	1,247	39,040	5/1 - 9/30	8,273	6,720	81.2	I
Pole Creek	2,731	0	2,852	5,583	4/1 - 10/31	516	201	39.0	C
Stormy	43,087	0	21,422	64,509	4/16-11/30	6,294	3,942	62.6	I
Devil's Gate	35,702	0	29,328	65,030	4/10- 5/31	6,117	5,232	85.5	I
Deeth	120,156	0	55,167	175,323	4/10-12/31	22,437	20,367	90.8	I
Morgan Hill	<u>13,737</u>	<u>0</u>	<u>14,960</u>	<u>28,697</u>	4/10-11/30	<u>1,127</u>	<u>201</u>	<u>17.8</u>	<u>C</u>
TOTALS	293,665	0	127,897	421,562		54,394	45,467	83.6	2M, 4I, 2C

TABLE A-1 (Continued)

GRAZING ALLOTMENT DATA BY RCA

SPRUCE/GOSHUTES RCA

Allotment	Public Land (BLM) Acres	Other Federal, State, County Acres	Unfenced Private Acres	Total Acres	Existing Periods of Use	Grazing Preference AUMs	Average 3-5 Yr Licensed Use (AUMs)	% Grazing Preference Used	Category
Big Springs	294,717	0	187,899	482,616	3/1 - 2/28	18,272	8,788	48.1	I
Pilot	81,833	0	61,249	143,082	11/12- 3/15	12,491	4,827	38.6	M
Ferber Flat	20,433	0	0	20,433	12/7 - 4/20	2,735	1,184	43.3	M
Lead Hills	80,602	0	195	80,797	11/1 - 3/31	7,930	3,214	40.5	M
Boone Springs	79,166	0	567	79,733	11/1 - 3/31	3,198	1,199*	—	M
Chase Springs	45,637	0	787	46,424	4/1 -11/30	2,586	1,131	43.7	I
White Horse	61,571	0	0	61,571	11/8 - 4/ 8	7,500	2,146	28.6	M
Sugarloaf	23,170	0	0	23,170	12/15- 4/25	3,105	603	19.4	M
Leppy Hills	68,704	2,704	1,587	72,995	12/15- 4/25	3,476	803	21.4	M
Spruce	797,142	0	16,125	813,267	3/1 - 2/28	35,565	17,380	48.9	I
West White Horse	7,208	0	0	7,208	12/15- 3/31	670	478	71.3	M
Badlands	19,812	0	0	19,812	12/15- 3/31	2,647	1,285	48.6	M
Utah/Nev. #1	107,760	12,256	601	120,617	11/10- 5/10	13,766	4,048	29.4	M
Antelope Valley	45,363	0	95	45,458	12/1 - 5/31	5,072	1,984	39.1	M
TOTALS	1,733,118	14,960	269,105	2,017,183		119,013	49,070	41.2	1IM, 3I

* Allotment has taken total nonuse for the time period used in computing licensed use; the figure used represents approximately half of the overall average percent of grazing preferences used in the Wells RA.

O'NEIL/SALMON FALLS RCA

Buckhorn	57,967	13	1,113	59,093	4/1 -10/31	6,775	6,635	97.9	I
Gulley	11,355	0	1,573	12,928	5/1 -11/30	1,633	2,100	128.6	M
Hubbard Vineyard	112,953	18	6,874	119,845	4/1 -12/31	13,096	13,029	99.5	I
Bear Creek	1,268	0	876	2,144	7/1 -10/31	240	240	100.0	C
Jackpot	66,369	0	3,768	70,137	5/15- 1/31	7,006	7,034	100.4	M
O'Neil	85,143	0	4,668	89,811	4/16-10/20	14,198	13,157	92.7	M
Salmon River	276,401	0	35,174	311,575	4/16-12/31	27,304	27,304	100.0	I
Cottonwood	16,506	360	133	16,999	4/1 -10/31	1,680	2,108	125.5	M
TOTALS	627,962	391	54,179	682,532		71,932	71,607	99.5	4M, 3I, 1C

TABLE A-1 (Continued)

GRAZING ALLOTMENT DATA BY RCA

GOOSE CREEK RCA

<u>Allotment</u>	<u>Public Land (BLM) Acres</u>	<u>Other Federal, State, County Acres</u>	<u>Unfenced Private Acres</u>	<u>Total Acres</u>	<u>Existing Periods of Use</u>	<u>Grazing Preference AUMs</u>	<u>Average 3-5 Yr Licensed Use (AUMs)</u>	<u>% Grazing Preference Used</u>	<u>Category</u>
Big Bend	52,492	0	7,655	60,147	4/1 -12/31	10,207	7,112	69.7	I
Grouse Creek	16,566	0	345	16,911	4/16-10/15	1,983	1,981	99.9	I
Barton	3,225	0	2,644	5,869	5/1 -11/30	810	795	98.1	M
Cavanaugh	Administered by Burley, Idaho, District				8/1 - 9/30	191	191	100.0	M
Bluff Creek	51,180	0	5,192	56,372	4/16-11/30	6,445	6,747	104.7	M
Little Goose Creek	<u>67,850</u>	<u>0</u>	<u>3,341</u>	<u>71,191</u>	4/1 -12/31	<u>6,268</u>	<u>6,332</u>	<u>101.0</u>	<u>I</u>
TOTALS	191,313	0	19,177	210,490		25,904	23,158	89.4	3M, 3I

PILOT/CRITTENDEN RCA

Pilot Valley	49,398	0	56,198	105,596	4/1 - 2/28	5,197	4,908	94.4	C
Dairy Valley	51,658	0	37,994	89,652	4/16-10/15	7,231	6,900	95.4	I
Gamble Individual	220,601	<u>0</u>	<u>124,736</u>	<u>345,337</u>	4/15-10/31	<u>18,335</u>	<u>18,335</u>	<u>100.0</u>	<u>I</u>
TOTALS	321,657	0	218,928	540,585		30,763	30,143	98.0	2I, 1C

TABLE A-1 (Continued)

GRAZING ALLOTMENT DATA BY RCA

METROPOLIS RCA

<u>Allotment</u>	<u>Public Land (BLM) Acres</u>	<u>Other Federal State, County Acres</u>	<u>Unfenced Private Acres</u>	<u>Total Acres</u>	<u>Existing Periods of Use</u>	<u>Grazing Preference AUMs</u>	<u>Average 3-5 Yr Licensed Use (AUMs)</u>	<u>% Grazing Preference Used</u>	<u>Category</u>
Black Butte	27,688	0	19,746	47,434	4/1 -10/31	6,474	6,573	101.5	M
Town Creek	5,270	0	5,859	11,129	5/1 - 8/31	1,110	833	75.0	C
Rabbit Creek	5,218	0	0	5,218	4/1 - 9/30	1,072	1,123	104.8	I
Bishop Creek	9,271	0	6,373	15,644	4/16- 9/30	1,362	1,192	87.5	M
Wells	2,774	0	1,614	4,388	5/1 - 9/30	551	551	100.0	C
Dalton	1,576	0	1,889	3,465	5/1 - 9/30	347	407	117.3	C
Antelope	3,714	0	595	4,309	5/1 - 9/30	478	554	115.9	I
H.D.	238,255	63	142,341	380,659	3/1 - 2/28	22,136	22,136	100.0	M
Holborn	26,292	0	22,904	49,196	4/1 -11/30	2,267	2,200	97.0	M
Cedar Hill	4,900	0	4,595	9,495	5/15-10/31	1,031	878	85.2	C
Metropolis	24,313	0	11,717	36,030	4/16- 9/30	2,510	2,020	80.5	M
Railroad Field	1,988	0	1,202	3,190	5/1 - 8/31	113	123	108.8	M
Westside	7,818	0	69	7,887	4/1 - 8/31	1,707	1,261	73.9	I
Spratling	5,219	0	118	5,337	3/20- 9/30	1,014	980	76.6	M
Trout Creek	2,136	0	2,706	4,842	4/16-10/15	642	651	101.4	C
Metropolis Seeding	2,417	0	0	2,417	4/16- 9/30	1,126	919	81.6	I
Bishop Flat	2,495	0	2,443	4,938	5/1 - 8/31	276	249	90.2	C
TOTALS	371,344	63	224,171	595,578		44,216	42,650	96.5	7M, 4I, 6C

TABLE A-1 (Continued)
GRAZING ALLOTMENT DATA BY RCA

RUBY/WOOD HILLS RCA

<u>Allotment</u>	<u>Public Land (BLM) Acres</u>	<u>Other Federal, State, County Acres</u>	<u>Unfenced Private Acres</u>	<u>Total Acres</u>	<u>Existing Periods of Use</u>	<u>Grazing Preference AUMs</u>	<u>Average 3-5 Yr Licensed Use (AUMs)</u>	<u>% Grazing Preference Used</u>	<u>Category</u>
Gordon Creek	808	0	1,134	1,942	5/15- 6/14	141	141	100.0	C
Warm Creek	1,537	0	0	1,537	3/1 - 6/20 & 11/15-11/30	175	159	90.9	I
Ruby #4	1,415	0	144	1,559	4/15- 6/15	314	314	100.0	C
Harrison	8,856	0	286	9,142	4/15- 6/25 & 11/1 -12/31	1,019	1,180	115.8	M
Forest	2,633	0	402	3,035	5/1 -10/31	316	105	33.2	C
Ruby #1	418	0	0	418	5/1 - 5/31	115	174	151.3	M
South Ruby	2,068	682	425	3,175	5/16- 7/31	196	80	40.8	C
Ruby #2	826	0	0	826	4/20- 9/19	237	237	100.0	M
Curtis Springs	37,434	0	880	38,314	11/1 - 3/31	1,841	690*	—	M
Moor Summit	9,605	0	8,718	18,323	3/1 -10/15	291	358	123.0	M
Tobar	18,542	0	15,814	34,356	4/1 - 2/28	1,717	778	45.3	C
Snow Water Lake	18,647	0	231	18,878	5/1 -11/13	1,160	1,165	100.4	M
Ruby #5	16,791	0	820	17,611	5/1 - 9/15	1,677	1,690	100.8	M
Smiley	5,497	0	6,872	12,369	4/16- 9/30	492	492	100.0	M
Ruby #7	12,444	0	517	12,961	5/16- 9/15	1,103	1,153	104.5	M
Hylton	2,449	0	1,744	4,193	4/15- 7/15	763	1,008	132.1	M
Wood Hills	40,103	0	31,354	71,457	4/1 -11/30	958	145	15.1	M
Clover Creek	2,185	422	22	2,629	5/1 -11/15	342	342	100.0	M
Big Meadows	14,559	0	117	14,676	5/1 -11/30	1,155	979	84.8	M
Ruby #6	16,042	0	222	16,264	5/1 -11/30	1,629	1,345	82.6	M
Ruby #8	28,900	0	164	29,064	4/15- 9/30	1,967	1,806	91.8	I
Mayhew Creek	1,032	0	0	1,032	5/1 - 5/30	156	127	81.4	C
Kelly Field	194	0	92	286	5/1 - 5/30	27	27	100.0	C
Bennett Field	1,164	0	1,634	2,798	5/15- 9/15	180	154	85.6	C
Overland Creek	265	0	78	343	6/15- 8/31	39	15	38.5	C
Ruby #3	4,683	0	389	5,072	4/16- 8/15	611	611	100.0	M
TOTALS	249,097	1,104	72,059	322,260		18,621	15,275	82.0	15M, 2I, 9C
GRAND TOTALS (WELLS RA)	4,143,588	17,581	991,157	5,152,326		379,279	288,934	76.2	45M,25I,19C

* Allotment has taken total nonuse for the time period used in computing licensed use; the figure used represents approximately half of the overall average percent of grazing preference used in the Wells RA.

TABLE A-2

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>AUM Demand****</u>	
Cherry Creek	DW-1	100	11/15- 3/15	4	3800 (2600)				3800	
	DW-6	100	12/01- 3/31	4	1200 (850)				1200	
	DS-1	100	3/16-11/14	8	1050 (800)				2100	
	DS-6	100	4/01-11/30	8	200 (100)				400	
	DS-5	22	4/01-11/30	8	50 (20)				100	
	AY-2	32	1/01-12/31	12			90 (120)		200	
	TOTAL					6300 (4370)	90 (120)			7800
Spruce/Goshutes	DY-1	100	1/01-12/31	12	200 (200)				600	
	DS-4	100	3/01-11/30	9	450 (300)				1000	
	DY-3	85	1/01-12/31	12	200 (100)				500	
	DWI-1	100	10/15-10/31	0.5	3300 (2100)				400	
	DW-2	100	11/15- 3/15	4	3800 (2600)				3800	
	DW-5	100	12/01- 3/31	4	1200 (850)				1200	
	DW-9	51	11/01- 3/30	5	1000 (700)				1300	
	DW-10	100	11/01- 3/30	5	3300 (2100)				4150	
	DW-11	94	11/01- 3/30	5	1000 (650)				1150	
	DW-	100	11/01- 3/30	5	300 (150)				400	
	(GOSHUTES)									
	DW-	100	11/01- 3/30	5	850 (450)					1050
	(KINGSLEYS)									300
	DS-5	78	4/01-11/30	8	150 (100)					
	AY-1	29	1/01-12/31	12			20 (20)			50
	AY-2	68	1/01-12/31	12			190 (40)			700
	AY-3	100	1/01-12/31	12			100 (50)			250
	AY-4	100	1/01-12/31	12			100 (25)			250
	AY-5	33	1/01-12/31	12			10 (5)			30
	EY-1	85	1/01-12/31	12					30 (40)	375
				11/01- 3/31	5				60 (55)	250
	BSY-4	100	1/01-12/31	12				200 (0)		500
	BSY-5	86	1/01-12/31	12				120 (0)		300
TOTAL					15,750 (10,300)	420 (140)	320 (0)	90 (95)	18,555	

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>ALM Demand</u>
Mary's River	DY-4	87	1/01-12/31	12	250 (175)				750
	DS-1	56	4/01-10/31	7	2800 (1400)				4900
	DS-4	30	4/01-10/31	7	850 (425)				1500
	AY-1	55	1/01-12/31	12		40 (40)			100
	AS-3	13	4/01-10/31	7		60 (60)			80
	PIEW-1	5	11/01- 3/31	5				10 (0)	40
	BSW-1	15	11/01- 3/31	5			10 (0)		10
TOTAL					3900 (2000)	100 (100)	10 (0)	10 (0)	7380
O'Neil/Salmon Falls	AS-1	100	4/01-10/31	7		125 (25)			175
	AS-2	100	4/01-10/31	7		150 (30)			200
	AS-3	47	4/01-10/31	7		200 (50)			300
	AW-1	57	11/01- 3/31	5		150 (30)			150
	AW-3	100	11/01- 3/31	5		150 (30)			150
	DY-1	100	1/01-12/31	12	100 (70)				300
	DS-1	44	4/01-10/31	7	2100 (1100)				3700
	DS-2	100	4/01-10/31	7	100 (50)				175
	DS-3	100	4/01-10/31	7	220 (110)				400
	DS-4	41	4/01-10/31	7	1200 (600)				2000
	DS-5	86	4/01-10/31	7	1800 (900)				3100
	DS-9	100	4/01-10/31	7	100 (50)				175
	DS-10	100	4/01-10/31	7	75 (40)				150
	* DSP-1	100	3/01- 3/31	1	4000 (2600)				1000
	DSP-2	100	3/01- 3/31	1	600 (400)				150
	DW-3	100	11/01- 3/31	5	2300 (1500)				2800
	DW-4	100	11/01- 3/31	5	3200 (2000)				4000
	** DW-5	11	11/01- 3/31	5	250 (100)				300
	PIEW-1	95	11/01- 3/31	5				90 (0)	350
	PIES-2	100	4/01-10/31	7				10 (0)	50
	BSY-1	100	1/01-12/31	12			90 (0)		200
	BSW-1	85	11/01- 3/31	5			40 (0)		40
TOTAL REASONABLE #'s (EXISTING #'s)					16,045 (9,520)	775 (165)	130 (0)	100 (0)	19,765

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>AUM Demand</u>
Goose Creek	** DW-5	31	11/01- 3/31	5	675 (300)				850
	DW-6	100	11/01- 3/31	5	600 (230)				750
	DS-6	100	4/01-10/31	7	820 (300)				1450
	DS-8	88	4/01-10/31	7	450 (175)				800
	DS-5	7	4/01-10/31	7	<u>150 (75)</u>				250
TOTAL					2695 (1080)				4100
Pilot/Crittenden	DY-2	100	1/01-12/31	12	100 (45)				100
	DY-3	15	1/01-12/31	12	30 (15)				100
	** DW-5	58	11/01- 3/31	5	1300 (550)				1600
	DW-11	6	11/01- 3/31	5	60 (40)				75
	DS-7	100	4/01-10/31	7	200 (75)				350
	DS-8	12	4/01-10/31	7	60 (25)				100
	EY-1	15	1/01-12/31	12				30 (20)	50
				11/01- 3/31	5			170 (50)	700
	BSY-5	14	1/01-12/31	12	_____		<u>20 (0)</u>	_____	<u>50</u>
TOTAL					1750 (750)		20 (0)	200 (70)	3125
Metropolis	DY-4	13	1/01-12/31	12	40 (25)				120
	DS-4	29	4/01-10/31	7	820 (410)				1450
	DS-5	7	4/01-10/31	7	150 (75)				250
	DW-9	4	11/01- 3/31	5	80 (60)				100
	AY-1	45	1/01-12/31	12			35 (10)		80
	AS-3	40	4/01-10/31	7		180 (70)			250
	AS-4	100	4/01-10/31	7		50 (20)			70
	AW-1	43	11/01- 3/31	7		100 (40)			150
	AW-2	100	11/01- 3/31	7		<u>50 (20)</u>			<u>70</u>
TOTAL					1090 (570)	415 (160)			2540

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

<u>RCA</u>	<u>Big Game Use Area</u>	<u>% within RCA</u>	<u>Season</u>	<u># of Months</u>	<u>Deer</u>	<u>Antelope</u>	<u>Bighorn***</u>	<u>Elk</u>	<u>AUM Demand</u>
Ruby/Wood Hills	DW-4	100	12/01- 4/30	5	725 (475)				900
	DSP-1	100	4/15- 5/15	1	3000 (2100)				750
	DW-9	45	11/01- 3/30	5	1000 (650)				1200
	DSP-2	100	4/15- 5/15	1	600 (475)				150
	AY-1	71	1/01-12/31	12		40 (80)			100
	AY-5	67	1/01-12/31	12		25 (5)			50
TOTAL					5325 (3700)	65 (85)			3150
Wells RA Total					52,855 (32,290)	1865 (770)	1250 (0)	400 (165)	66,415

* - Deer Spring (DSP) is figured at the same percentage as the existing carrying capacity of the primary winter range (% existing of reasonable)

** - Reasonable & existing numbers do not allow for approximately 4000 deer that migrate into this area from Idaho & Utah.

*** - Reasonable Numbers updated by publication Potential Bighorn Sheep Habitat in Northern Nevada, Golden & Tskumoto 1979.

**** - AUM demand, as depicted here, only represents what the demand of reasonable numbers would be. Allocation is not implied nor anticipated, this information is presented for analysis purposes only.

TABLE A-3

COMPARISON OF LIVESTOCK AUMs
BY ALTERNATIVE

CHERRY CREEK RCA

<u>Allotment Name</u>	<u>Preference</u>	<u>Estimated* Production</u>	<u>3-5 Yr. Average Use</u>	<u>No Action</u>	<u>Resource Production</u>	<u>Midrange</u>	<u>Resource Protection</u>	<u>Preferred</u>
Ruby #9	810	581	646	646	646	646	530	646
Bald Mountain	1,173	655	818	818	818	818	702	818
Currie	4,687	6,378	4,461	4,461	5,033	4,461	3,305	4,461
North Butte Valley	1,645	1,182	682	682	682	682	335	682
Maverick	1,864	701	1,106	1,106	1,906	1,106	875	1,106
West Cherry Creek	2,661	728	2,661	2,661	3,711	2,661	1,505	2,661
Odgers	1,596	420	1,190	1,190	1,640	1,190	843	1,190
TOTALS	14,436	10,645	11,564	11,564	14,436	11,564	8,095	11,564

MARYS RIVER RCA

Hot Creek	4,163	1,941	4,137	4,137	4,137	4,137	3,682	4,137
Anderson Creek	5,467	3,262	4,667	4,667	4,667	4,667	3,758	4,667
Stag Mountain	8,273	4,579	6,720	6,720	6,720	6,720	4,901	6,720
Pole Creek	516	818	201	201	201	201	201	201
Stomy	6,294	2,031	3,942	3,942	6,294	3,942	1,669	3,942
Devil's Gate	6,117	2,349	5,232	5,232	6,117	5,232	4,777	5,232
Deeth	22,437	19,081	20,367	20,367	26,057	20,367	14,911	20,367
Morgan Hill	1,127	1,901	201	201	201	201	201	201
TOTALS	54,394	35,962	45,467	45,467	54,394	45,467	34,100	45,467

* Estimated production is based on a one point in time weight estimate survey

TABLE A-3 (Continued)

COMPARISON OF LIVESTOCK AUMs
BY ALTERNATIVE

SPRUCE/GOSHUTES RCA

<u>Allotment Name</u>	<u>Preference</u>	<u>Estimated* Production</u>	<u>3-5 Yr. Average Use</u>	<u>No Action</u>	<u>Resource Production</u>	<u>Midrange</u>	<u>Resource Protection</u>	<u>Preferred</u>
Big Springs	18,272	7,715	8,788	8,788	26,973	8,788	3,882	8,788
Pilot	12,491	6,295	4,827	4,827	4,827	4,827	3,355	4,827
Ferber Flat	2,735	2,135	1,184	1,184	1,184	1,184	693	1,184
Lead Hills	7,930	3,985	3,214	3,214	3,214	3,214	2,233	3,214
Boone Springs	3,198	8,593	1,199	1,199	1,199	1,199	708	1,199
Chase Springs	2,586	607	1,131	1,131	3,929	1,131	640	1,131
White Horse	7,500	6,864	2,146	2,146	2,146	2,146	1,655	2,146
Sugarloaf	3,105	2,038	603	603	603	603	112	603
Leppy Hills	3,476	7,125	803	803	803	803	312	803
Spruce	35,565	21,450	17,380	17,380	66,340	17,380	5,113	17,380
West White Horse	670	734	478	478	478	478	478	478
Bad Lands	2,647	873	1,285	1,285	1,285	1,285	794	1,285
Utah-Nev. #1	13,766	5,904	4,048	4,048	4,048	4,048	3,067	4,048
Antelope Valley	5,072	3,892	1,984	1,984	1,984	1,984	1,493	1,984
TOTALS	119,013	78,210	49,070	49,070	119,013	49,070	24,535	49,070

O'NEIL/SALMON RCA

Buckhorn	6,775	6,415	6,635	6,635	7,100	6,635	3,771	6,635
Gulley	1,633	2,850	2,100	2,100	2,100	2,100	1,384	2,100
Hubbard Vineyard	13,096	12,489	13,029	13,029	13,924	13,029	6,584	13,029
Bear Creek	240	152	240	240	240	240	240	240
Jackpot	7,006	7,600	7,034	7,034	7,034	7,034	1,305	7,034
O'Neil	14,198	7,998	13,157	13,157	13,157	13,157	6,712	13,157
Salmon River	27,304	16,667	27,304	27,304	29,524	27,304	4,390	27,304
Cottonwood	1,680	1,619	2,108	2,108	2,108	2,108	676	2,108
TOTALS	71,932	55,790	71,607	71,607	75,187	71,607	25,062	71,607

* Estimated production is based on a one point in time weight estimate survey

TABLE A-3 (Continued)

COMPARISON OF LIVESTOCK AUMs
BY ALTERNATIVE

GOOSE CREEK RCA

<u>Allotment Name</u>	<u>Preference</u>	<u>Estimated* Production</u>	<u>3-5 Yr. Average Use</u>	<u>No Action</u>	<u>Resource Production</u>	<u>Midrange</u>	<u>Resource Protection</u>	<u>Preferred</u>
Big Bend	10,207	5,262	7,112	7,112	9,858	7,112	6,880	7,112
Grouse Creek	1,983	1,451	1,981	1,981	1,981	1,982	1,749	1,981
Barton	810	371	795	795	795	795	100	795
Cavanaugh	191	—	191	191	191	191	191	191
Bluff Creek	6,445	6,554	6,747	6,747	6,747	6,747	5,821	6,747
Little Goose Creek	6,268	3,807	6,332	6,332	6,332	6,332	4,943	6,332
TOTALS	25,904	17,445	23,158	23,158	25,904	23,158	19,684	23,158

PILOT/CRITTENDEN RCA

Pilot Valley	5,197	2,276	4,908	4,908	4,908	4,908	3,702	4,908
Dairy Valley	7,231	4,295	6,900	6,900	7,100	6,900	3,886	6,900
Gamble Individual	18,335	16,526	18,335	18,335	19,673	18,335	9,292	18,335
TOTALS	30,763	23,097	30,143	30,143	31,681	30,143	16,880	30,143

METROPOLIS RCA

Black Butte	6,474	9,665	6,573	6,573	6,573	6,573	4,867	6,573
Town Creek	1,110	776	833	833	833	833	620	833
Rabbit Creek	1,072	1,646	1,123	1,123	2,623	1,123	910	2,623
Bishop Creek	1,362	1,657	1,192	1,192	1,192	1,192	979	1,192
Wells	551	222	551	551	551	551	338	551
Dalton	347	467	407	407	407	407	194	407
Antelope	478	679	554	554	620	554	341	620
H.D.	22,136	21,913	22,136	22,136	22,136	22,136	18,294	22,136
Holborn	2,267	3,414	2,200	2,200	2,200	2,200	1,987	2,200
Cedar Hill	1,031	758	878	878	878	878	665	878
Metropolis	2,510	2,864	2,020	2,020	2,020	2,020	1,807	2,020
Railroad Field	113	301	123	123	123	123	123	123
Westside	1,707	2,018	1,261	1,261	1,261	1,261	1,048	1,261
Spratling	1,014	3,431	980	980	980	980	767	980
Trout Creek	642	530	651	651	651	651	438	651
Metropolis Seeding	1,126	2,736	919	919	919	919	706	919
Bishop Flat	276	388	249	249	249	249	36	249
TOTALS	44,216	53,465	42,650	42,650	44,216	42,650	34,120	44,216

* Estimated production is based on a one point in time weight estimate survey

TABLE A-3 (Continued)

COMPARISON OF LIVESTOCK AUMs
BY ALTERNATIVE

RUBY/WOOD HILLS

<u>Allotment Name</u>	<u>Preference</u>	<u>Estimated* Production</u>	<u>3-5 Yr. Average Use</u>	<u>No Action</u>	<u>Resource Production</u>	<u>Midrange</u>	<u>Resource Protection</u>	<u>Preferre</u>
Gordon Creek	141	68	141	141	141	141	141	141
Warm Creek	175	77	159	159	175	159	159	175
Ruby #4	314	965	314	314	314	314	314	314
Harrison	1,019	1,051	1,180	1,180	1,180	1,180	1,180	1,180
Forest	316	373	105	105	105	105	105	105
Ruby #1	115	419	174	174	174	174	174	174
South Ruby	196	131	80	80	80	80	80	80
Ruby #2	237	400	237	237	237	237	237	237
Curtis Springs	1,841	1,970	690	690	690	690	537	690
Moor Summit	291	2,195	358	358	358	358	358	358
Tobar	1,717	550	778	778	778	778	778	778
Snow Water Lake	1,160	1,429	1,165	1,165	1,165	1,165	1,050	1,165
Ruby #5	1,677	5,602	1,690	1,690	1,690	1,690	1,575	1,690
Smiley	492	430	492	492	492	492	492	492
Ruby #7	1,103	1,841	1,153	1,153	1,153	1,153	1,153	1,153
Hylton	763	869	1,008	1,008	1,008	1,008	1,008	1,008
Wood Hills	958	1,533	145	145	145	145	145	145
Clover Creek	342	260	342	342	342	342	189	342
Big Meadows	1,155	898	979	979	979	979	864	979
Ruby #6	1,629	2,048	1,345	1,345	1,345	1,345	926	1,345
Ruby #8	1,967	1,111	1,806	1,806	5,136	1,806	1,501	5,136
Mayhew Creek	156	137	127	127	127	127	127	127
Kelly Field	27	11	27	27	27	27	27	27
Bennett Field	180	112	154	154	154	154	154	154
Overland Creek	39	55	15	15	15	15	15	15
Ruby #3	611	1,914	611	611	611	611	611	611
TOTALS	18,621	26,449	15,275	15,275	18,621	15,275	13,900	18,621
Resource Area Totals	379,279	301,063	288,934	288,934	383,452	288,934	176,376	293,846

* Estimated production is based on a one point in time weight estimate survey

TABLE A-4

GRAZING TREATMENTS ON EXISTING
ALLOTMENT MANAGEMENT PLANS (AMP)

Cottonwood AMP

System: 4 pasture rest rotation

Treatments: 4/1-6/10, 6/11-7/31, 8/1-11/30,
Rest

Treatments: 7-pasture

1. 5/1-12/31, 7/15-12/31, rest
2. 5/15-12/31, 8/1-12/31, rest

4-pasture

1. 5/15-12/31, 8/1-12/31, rest

Hot Creek AMP

System: 3 pasture rest rotation

Treatments: early (4/1-7/25),
late (7/26-11/30), rest

Note: dates are approximate

Ruby #1 AMP

System: 1 pasture deferred

Treatments: 5/1-5/31 + 8/1-8/31, 8/1-9/30

Ruby #5 AMP

Seeding: 3 pasture rest rotation

Treatments: 5/1-5/31, 6/1-6/30, rest

Native: 3 pasture rest rotation

Treatments: 7/1-8/10, 8/11-9/15, rest

O'Neil AMP

System: 4, 3-pasture rest rotation systems
1 deferred system

Treatments: Rest rotation -

1. Spring/Summer (4/16-9/15),
Summer/Fall (7/1-9/15),
Rest
2. Spring (4/16-7/15),
Summer (6/1-7/15)
Rest
3. Spring/Summer (4/16-10/20),
Summer/Fall (7/16-10/20),
Rest
4. Spring/Summer (4/16-10/10),
Summer/Fall (6/11-10/10),
Rest

Ruby #6 AMP

Neff Ranch Co.: 3 pasture rest rotation

Treatments: 5/1-6/15, 11/16-1/15, rest

UX Livestock Co.: 5/1-6/15, 6/16-8/15, rest
3 pasture rest rotation

Deferred -

1. Fall (8/1-10/10)

Utah-Nevada AMP

System: 3 pasture deferred rotation

Treatments: 11/10-3/31, 11/10-3/31,
11/10-3/31

Spratling AMP

System: 3 pasture rest rotation

Treatments: 3/20-5/5, 5/6-6/25, rest

Jackpot AMP

System: 2, 7-pasture rest rotation
1, 4-pasture rest rotation

TABLE A-5

LAND TREATMENTS FOR LIVESTOCK GRAZING
BY ALLOTMENT AND ALTERNATIVE (ACRES)

CHERRY CREEK RCA

ALLOTMENT	RESOURCE PRODUCTION			MIDRANGE			RESOURCE PROTECTION			PREFERRED		
	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY
Ruby #9												
Bald Mountain												
Currie	2500			2000						2000		
North Butte Valley												
Maverick	2250			1000						1000		
West Cherry Creek	3000			2000						2000		
Odgers	1250			2000						2000		
TOTALS	9000			7000						7000		

MARY'S RIVER RCA

Hot Creek												
Anderson Creek												
Stag Mountain												
Pole Creek												
Stompy	6000			7000			7000				7000	
Devil's Gate	2500											
Deeth	4500											
Morgan Hill												
TOTALS	13000			7000			7000				7000	

SPRUCE/GOSHUTES RCA

Big Springs	48100											
Pilot												
Ferber Flat												
Lead Hills												
Boone springs												
Chase Springs	7400			2000						2000		
White Horse												
Sugar Loaf												
Leppy Hills												
Spruce	129500			6000						6000		
West White Horse												
Bad Lands												
Utah-Nev #1												
Antelope Valley												
TOTALS	185000			8000						8000		

TABLE A-5 (Continued)

O'NEIL/SALMON FALLS RCA

ALLOTMENT	RESOURCE PRODUCTION			MIDRANGE			RESOURCE PROTECTION			PREFERRED			
	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	
Buckhorn	1350			1000				1500			1000		
Gulley													
Hubbard Vineyard	2650			4500				500			4500		
Bear Creek													
Jackpot													
O'Neil													
Salmon River	6500			4500				1500			4500		
Cottonwood													
TOTALS	10,500			10,000				3500			10,000		

GOOSE CREEK RCA

Big Bend	6000			1500	1500	1500		1000			1500	1500	1500
Grouse Creek					1000			1000			1000		
Barton													
Cavanaugh													
Bluff Creek													
Little Goose Creek				2500	3500						2500	3500	
TOTALS	6000			4000	6000	1500		2000			4000	6000	1500

PILOT/CRITTENDEN RCA

Pilot Valley													
Dairy Valley		2000			2500			2500				2500	
Gamble Individual		8500			8000			8000				8000	
TOTALS		10,500			10,500			10,500				10,500	

TABLE A-5 (Continued)

METROPOLIS RCA

<u>ALLOTMENT</u>	<u>RESOURCE PRODUCTION</u>			<u>MIDRANGE</u>			<u>RESOURCE PROTECTION</u>			<u>PREFERRED</u>		
	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>
Black Butte												
Town Creek												
Rabbit Creek	1800									1800		
Bishop Creek												
Wells												
Dalton												
Antelope	200									200		
H.D.												
Holborn												
Cedar Hill												
Metropolis												
Railroad Field												
Westside												
Spratling												
Trout Creek												
Metropolis Seeding												
Bishop Flat												
TOTAL	2000									2000		

RUBY/WOOD HILLS RCA

Gordon Creek
 Warm Creek
 Ruby #4
 Harrison
 Forest
 Ruby #1
 South Ruby
 Ruby #2
 Curtis Springs
 Moor Summit
 Tobar
 Snow Water Lake
 Ruby #5
 Smiley
 Ruby #7
 Hylton
 Wood Hills
 Clover Creek

TABLE A-5 (Continued)

RUBY/WOOD HILLS RCA (Continued)

<u>ALLOTMENT</u>	<u>RESOURCE PRODUCTION</u>			<u>MIDRANGE</u>			<u>RESOURCE PROTECTION</u>			<u>PREFERRED</u>		
	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>	<u>SDG.</u>	<u>BURN</u>	<u>SPRAY</u>
Big Meadows												
Ruby #6												
Ruby #8	6500			1000						6500		
Mayhew Creek												
Kelly Field												
Bennett Field												
Overland Creek												
Ruby #3												
TOTAL	6500			1000						6500		
TOTAL BY ALTERNATIVE	232,000	10,500		30,000	23,500	1500				37,500	23,500	1500

TABLE A-6

APPARENT TREND (ACRES) BY RCA

<u>RCA</u>	<u>DOWN</u>	<u>%</u>	<u>STATIC</u>	<u>%</u>	<u>UP</u>	<u>%</u>	<u>TOTAL</u>	<u>%</u>
Cherry Creek	17,724	5	292,891	81	51,521	14	362,136	100
Mary's River	73,582	17	188,611	45	159,369	38	421,562	100
Spruce Goshutes	168,428	9	1,577,668	78	271,087	13	2,017,183	100
O'Neil Salmon Falls	80,599	12	456,050	67	145,883	21	682,532	100
Goose Creek	1,221	1	144,355	69	64,914	30	210,490	100
Pilot Crittenden	59,305	11	279,488	52	201,792	37	540,585	100
Metropolis	80,150	13	344,359	58	171,069	29	595,578	100
Ruby/Wood Hills	82,652	26	194,303	60	45,305	14	322,260	100
TOTALS	563,661	11	3,477,725	67	1,110,940	22	5,152,326	100

NOTE: Totals include all unfenced private land, land administered by the U.S. Forest Service, and BLM administered land which falls within the boundary of each RCA.

Source: Bureau of Land Management 1982b

TABLE A-7

Costs and returns for beef herds of 0-199 cows,
BLM-Wells EIS Area, Northeast Nevada

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	9	360	80.67	2,614
Heifer calves	Head	4	330	71.75	947
Yearling Steers	Head	13	625	68.56	5,571
Yearling heifers	Head	4	550	64.95	1,429
Cull cows	Head	10	900	43.07	3,876
Cull yearling heifers	Head	3	630	61.13	1,155
Total					15,592
Total/cow					210.70
Cash Costs:					
BLM grazing fee				911	12.31
Forest grazing fee				48	.65
Other BLM grazing fee				640	8.64
Hay (produce)				2,323	31.39
Protein supplement				943	12.74
Salt and mineral				130	1.75
Veterinary and medicine				444	6.00
Hired trucking				276	3.73
Marketing				119	1.61
Fuel and lubricants				845	11.41
Repairs				828	11.18
Taxes				1,718	23.22
Insurance				444	5.99
Interest on operating capital				546	7.37
General farm overhead				663	8.96
Hired labor				1,042	14.08
Total cash costs				11,920	161.08
Other Costs:					
Family labor				2,083	28.15
Depreciation				2,524	34.11
Interest on investment other than land				7,910	106.89
Interest on land				29,172	394.22
Total other costs				41,689	563.36
Total all costs				53,609	724.45
Return above cash costs				3,672	49.62
Return above cash costs and family labor				1,589	21.47
Return to total investment				-935	-12.64
Return to land				-8,845	-119.53

FOOTNOTE: Average herd 74 cows, 80 percent calf crop based on Jan 1 bred cow inventory with pregnancy test, 6 pct. calf loss birth to weaning, 3 pct. annual cow loss, 20 pct replacement rate, 18 cows per bull, cattle and purchased hay prices 1978-80 three year averages, all other costs 1980, percent forage dependency Wells EIS area 30 pct., other BLM 20 pct., National Forest 1 pct., Deeded range 25 pct., hay 22 pct., protein supplement 2 pct., real estate valued on an AU basis.

TABLE A-7 (Continued)
 Costs and returns for beef herds of 200-499 cows,
 BLM-Wells EIS Area, Northeast Nevada

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	48	360	80.67	13,940
Heifer calves	Head	24	330	71.75	5,683
Yearling Steers	Head	71	625	68.56	30,424
Yearling heifers	Head	23	550	64.95	8,216
Cull cows	Head	44	900	43.07	17,056
Cull yearling heifers	Head	10	630	61.13	3,851
Total					79,170
Total/cow					250.54
			<u>Total</u>	<u>Value/</u>	
			Value	Cow	
Cash Costs:					
BLM grazing fee				2,520	7.98
Forest grazing fee				333	1.05
Other BLM grazing fee				467	1.48
Hay (produce)				10,366	32.80
Protein supplement				3,643	11.53
Salt and mineral				553	1.75
Veterinary and medicine				3,118	9.87
Hired trucking				1,938	6.13
Marketing				836	2.65
Fuel and lubricants				5,606	17.74
Repairs				5,018	15.88
Taxes				6,964	22.04
Insurance				1,925	6.09
Interest on operating capital				3,129	9.90
General farm overhead				4,656	14.73
Hired labor				14,630	46.30
Total cash costs				65,702	207.92
Other Costs:					
Family labor				10,746	34.01
Depreciation				12,453	39.41
Interest on investment other than land				34,616	109.54
Interest on land				115,815	366.50
Total other costs				173,630	549.46
Total all costs				239,332	757.38
Return above cash costs				13,468	42.62
Return above cash costs and family labor				2,722	8.61
Return to total investment				-9,731	-30.79
Return to land				-44,347	-140.34

FOOTNOTE: Average herd 316 cows, 80 percent calf crop based on Jan 1 bred cow inventory with pregnancy test, 6 pct. calf loss birth to weaning, 3 pct. annual cow loss, 20 pct replacement rate, 18 cows per bull, cattle and purchased hay prices 1978-80 three year averages, all other costs 1980, percent forage dependency Wells EIS area 18 pct., other BLM 3 pct., National Forest 3 pct., Deeded range 52 pct., hay 21 pct., protein supplement 3 pct., real estate valued on an AU basis.

TABLE A-7 (Continued)
 Costs and returns for beef herds of 500-999 cows,
 BLM-Wells EIS Area, Northeast Nevada

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	112	360	80.67	32,526
Heifer calves	Head	65	330	71.75	15,390
Yearling Steers	Head	167	625	68.56	71,560
Yearling heifers	Head	65	550	64.95	23,220
Cull cows	Head	97	900	43.07	37,600
Cull yearling heifers	Head	30	630	61.13	11,554
Total					191,850
Total/cow					258.21
Cash Costs:					
				Total Value	Value/ Cow
BLM grazing fee				6,226	8.38
Forest grazing fee				933	1.26
Private range lease/rent				7,381	9.93
Other BLM grazing fee				184	.25
Hay (produce)				24,532	33.02
Protein supplement				9,456	12.73
Salt and mineral				1,301	1.75
Veterinary and medicine				4,458	6.00
Hired trucking				1,984	2.67
Marketing				1,984	2.67
Fuel and lubricants				8,182	11.01
Repairs				7,659	10.31
Taxes				14,419	19.41
Insurance				4,411	5.94
Interest on operating capital				6,151	8.28
General farm overhead				6,658	8.96
Hired labor				20,927	28.17
Total cash costs				126,846	170.72
Other Costs:					
Family labor				20,059	27.00
Depreciation				23,674	31.86
Interest on investment other than land				77,843	104.77
Interest on land				244,182	328.64
Total other costs				365,758	492.27
Total all costs				492,604	662.99
Return above cash costs				65,004	87.49
Return above cash costs and family labor				44,945	60.49
Return to total investment				21,271	28.63
Return to land				-56,572	-76.14

FOOTNOTE: Average herd 743 cows, 80 percent calf crop based on Jan. 1 bred cow inventory with pregnancy test, 6 pct., calf loss birth to weaning, 3 pct. annual cow loss, 20 pct. replacement rate, 18 cows per bull, cattle and purchased hay prices 1978-80 three year averages, all other costs 1980, percent forage dependency Wells EIS area 20 pct., other BLM 1 pct., National Forest 3 pct., deeded range 47 pct., range lease 5 pct., hay 21 pct., protein supplement 3 pct., real estate valued on an AU basis.

TABLE A-7 (Continued)
 Costs and returns for beef herds of more than 1,000 cows,
 BLM-Wells EIS Area, Northeast Nevada

Item	Unit	Number	Average Weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	362	360	80.67	105,129
Heifer calves	Head	212	330	71.75	50,196
Yearling Steers	Head	543	625	68.56	232,676
Yearling heifers	Head	212	550	64.95	75,732
Cull cows	Head	314	900	43.07	121,716
Cull yearling heifers	Head	96	630	61.13	36,971
Total					622,420
Total/cow					258.37
			<u>Total Value</u>	<u>Value/Cow</u>	
Cash Costs:					
BLM grazing fee			19,222	7.98	
Forest grazing fee			2,058	.85	
Private range lease/rent			37,623	15.62	
Hay (produce)			79,519	33.01	
Protein supplement			30,760	12.77	
Salt and mineral			4,215	1.75	
Veterinary and medicine			11,805	4.90	
Hired trucking			1,120	.46	
Marketing			3,361	1.40	
Fuel and lubricants			13,003	5.40	
Repairs			19,019	7.90	
Taxes			41,850	17.37	
Insurance			13,606	5.65	
Interest on operating capital			17,928	7.44	
General farm overhead			15,659	6.50	
Hired labor			46,095	19.13	
Total cash costs			356,843	148.13	
Other Costs:					
Family labor			49,867	20.70	
Depreciation			60,796	25.24	
Interest on investment other than land			243,214	100.96	
Interest on land			720,267	298.99	
Total other costs			1,074,144	445.89	
Total all costs			492,604	594.02	
Return above cash costs			265,577	110.24	
Return above cash costs and family labor			215,710	89.54	
Return to total investment			154,914	64.31	
Return to land			-88,300	-36.65	

FOOTNOTE: Average herd 2409 cows, 80 percent calf crop based on Jan. 1 bred cow inventory with pregnancy test, 6 pct. calf loss birth to weaning, 3 pct. annual cow loss, 20 pct. replacement rate, 18 cows per bull, cattle and purchased hay prices 1978-80 three year averages, all other prices 1980, percent forage dependency Wells EIS area 19 pct., National Forest 2 pct., deeded range 47 pct., range lease 8 pct., hay 21 pct., protein supplement 3 pct., real estate valued on an AU basis.