



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Eagle Lake Resource Area  
705 Hall Street  
Susanville, CA 96130

6-22-95

JUN 22 1995

In Reply  
Refer to:  
4130 (CA-026)

Dear Interested Party:

You are being invited to join BLM in a field examination of the sites of proposed BLM projects for the Twin Peaks Allotment. These projects are proposed for implementation in 1995 and 1996. The field examination is slated for July 19, 20, and 21 (if necessary), 1995. The examination will involve viewing the project sites and discussing project intent and design. During the examination, BLM would like tour participants to discuss the merits of the subject proposals relative to their consistency with and their ability to facilitate management that furthers the goals and objectives of the Cal-Neva Management Framework Plan and Final Grazing Environmental Impact Statement of 1983, the Twin Peaks Allotment Management Plan of 1985 as modified in 1992, the Wilderness Recommendations, Eagle Lake - Cedarville Study Areas, Final Environmental Impact Statement of 1987, and BLM policy for management of livestock grazing, wildlife habitat, riparian areas, wild horse and burros, wilderness study areas, cultural resources, special status plants and animals, and water quality compliance.

Last February we invited comments from eighty-three entities concerning these project proposals. This solicitation anticipated BLM environmental analysis of project impacts required by NEPA (National Environmental Policy Act of 1969) and included a brief description of each project and its intended purposes, and maps showing the proposed project locations. Responses to this solicitation were received from The Wilderness Society, Intermountain Range Consultants (representing John Espil Sheep Company), Sierra Club - Toiyabe Chapter, California Mule Deer Foundation, California Wilderness Coalition, Sierra Club - Mother Lode Chapter - Shasta Group, Hal J. Whitaker, and the Nevada Division of Wildlife.

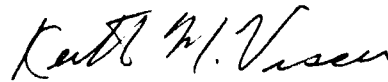
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Also enclosed with this letter are maps which show the current proposed project locations in a larger setting than the maps provided with the February notice. Please note that the proposal for the Bullfrog fence has been dropped in favor of an option which maintains the existing fence in place with additional gates that are to be opened during the time that they are not needed to control livestock. Also be aware that a late-May examination of Seep 13 resulted in it being dropped as a proposed project in favor of an enclosure around a spring in an adjacent drainage

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If you plan to attend the field examination, please RSVP to Ken Visser of my staff at (916) 257-0456 or at the above address by July 7, 1995. Ken Visser will provide all respondents with the logistical details of the field examination after that time.

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Acting For Linda D. Hansen  
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Enclosures

- 1) BLM Synopsis of Comments Received
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**SYNOPSIS OF COMMENTS RECEIVED IN RESPONSE TO BLM'S FEBRUARY,  
1995 REQUEST FOR COMMENTS ON 1995 AND 1996 PROJECT PROPOSALS IN  
THE TWIN PEAKS ALLOTMENT**

compiled by: Ken Visser, Supervisory Range Conservationist, Eagle Lake Resource Area,  
Susanville District BLM, Susanville, California

June 15, 1995

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**The Sierra Club - Toiyabe Chapter** commented that they understood that "the Twin Peaks allotment has seriously degraded the public lands", especially the riparian areas in the region, and that they hope the BLM will address the entire problem, including a reduction in the livestock on the range. They state that this is an important area for mule deer and pronghorn and that the best management practices need to be instituted as soon as possible. Concerning the Chimney drift fences, they state they understand that gap fencing is allowed under BLM wilderness study area Interim Management Guidelines and under BLM Wilderness Management Policy, but that 4.5 miles of fence does not seem to come under the category of a gap fence and that they could find no explanation (in the Notice) of why a wire fence to control livestock movement between Chimney and Buffalo subdivisions would necessarily help the restoration of the riparian areas and that this needs to be explained. Concerning East Fork Springs and Pipeline, they commented that it is necessary to be very careful in any alterations they are made in these water sources. They asked if an inventory of snails, amphibians, insects and any other creatures that may live there, and of sensitive plants and cultural resources has been made. They stated that generally they believe that development in WSA's should only occur for the benefit of endemic wildlife and that such development needs to be done carefully to ensure that no degradation of the wilderness quality of the WSA occurs. They believe a field trip is needed for BLM to demonstrate what we have proposed. Concerning the Red Rock Springs I & II redevelopment and the Sagehen Spring redevelopment, they comment that these proposals have the same problems as the East Fork Springs and Pipeline and need the same attention. They question whether troughs in the uplands are necessary for the benefit of wildlife and are concerned that Red Rock Springs I & II redevelopment exceeds what is allowed in a WSA and would like to see a ruling from the State Wilderness Coordinator in Nevada on this question. They noted that the projects in California regarding spring developments and pipelines are in areas determined to be non-suitable whereas similar projects in Nevada are in areas "usually" deemed suitable, and hoped that the Nevada lands in WSA status managed by Susanville BLM will have equal protection (as those in California).

**California Mule Deer Association (CMDA)** stated that it appears that the projects are well beyond the scoping stage and are into the site specific stage and assume that the comments requested are scoping comments. They state that CMDA and the public have repeatedly been opposed to any project that may reduce the wilderness character of WSA's, particularly those

recommended for wilderness. They request that BLM provide written assurance that these projects will not impair the designation of recommended wilderness areas before continuing the planning process for these projects so as to comply with law and BLM policy. They commented that the Twin Peaks AOPs have clearly stated the aspen groves in the Skedaddles are to be completely avoided by any livestock and that the need to fence these areas demonstrates BLM's inability to control the livestock in the proposed project areas. They suggested the BLM take the necessary action to ensure that these areas are not used by livestock by designating the Skedaddles unsuitable for grazing based on inability to control livestock movement, and that BLM needs to deal with the source of the problem and not simply apply a band-aid reaction. They comment that as riparian areas provide a disproportional amount of livestock forage and that these areas will be made unavailable for livestock use (due to the proposed projects), subsequent AUM reductions are necessary to reflect this. They comment that due to excluding livestock from the proposed project areas, adjacent upland areas will receive an increase in livestock pressure from foraging, compacting and trampling, providing further stress to key shrub communities already identified as being in critical condition. They state that project planning must take this into account in analyzing suitability for the projects, and that BLM should deal with the source of the problem and not band-aid it. They state that ~~the projects will cost the Agency to pay an excessive economic and environmental cost and request that BLM provide and accurate cost-benefit analysis for all proposed projects including subsequent impact to wildlife and all recreation opportunities.~~ They comment that the entire project area lies within antelope and mule deer range and will have significant impacts to the species, particularly when cumulative impacts are analyzed considering degraded habitat conditions and caloric expenditures by wildlife, blocked passage to critical ranges, entrapment and entanglement. They state they find it difficult to accept the idea of fencing out sheep without fencing out deer and antelope simultaneously and that 3-way enclosure designs clearly point this out. They comment that a realistic and accurate analysis must be provided for direct, indirect and cumulative impacts to wildlife. They state that acknowledgement of BLM is needed as far as the dependability of fencing to exclude livestock based on decades of documented experience exhibiting the contrary. They comment that fences somehow get cut, broken down, blown over, torn down, left open, etc., etc., and ask what assurance, if any, can BLM provide to the public regarding required fence maintenance and what are the consequences to the parties responsible for fence maintenance if said maintenance is not provided. They state that fences on such a large scale are a bad public investment for the above-stated reasons. They suggest that the terms and conditions of the grazing permit be modified to provide specific requirements for areas to be avoided and if the livestock cannot be controlled to meet the terms and conditions, the permit should be cancelled. They comment that this alternative is the most economically and environmentally responsible answer to the public concerns and resource damage issues on this allotment.

**California Wilderness Coalition** commented that because the Twin Peaks allotment occurs in one of the wildest and most isolated areas of California and is the site of their proposed Smoke Creek Wilderness, preserving its ecological integrity is a high priority for their organization. They commented that they are concerned that the proposed actions may not be the best way to achieve the goals they support of improved riparian habitat, water quality and aquatic ecosystems in the Twin Peaks allotment. They stated that their observations of the allotment over the last

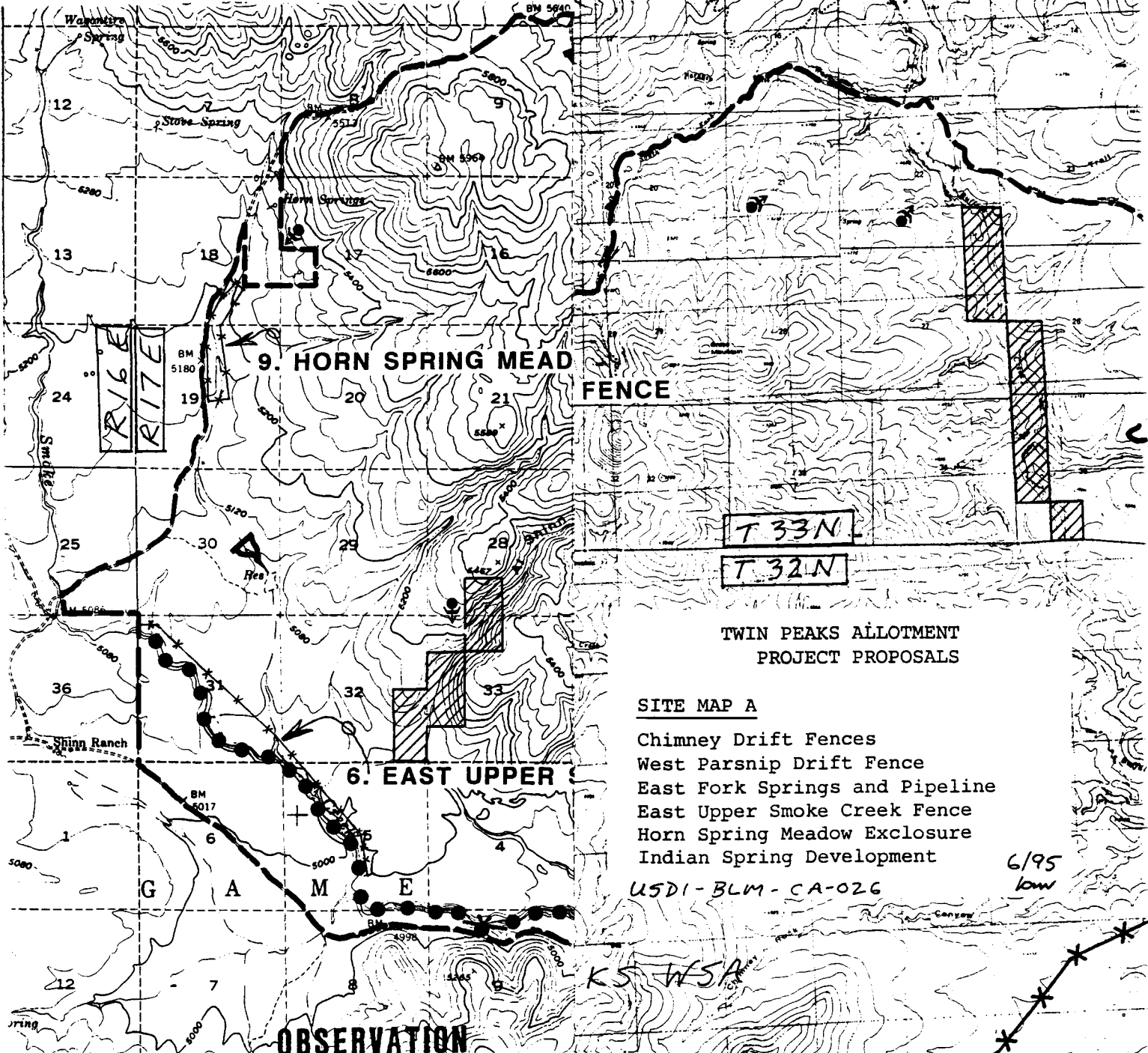
two years indicate that it is badly overgrazed and that remedying the situation calls for a reduction in AUM's, increased salting and riding on the part of the permittees, changing the seasons of use, resting the area and increased monitoring by BLM. They comment that these remedies are more likely to improve riparian and upland conditions than fencing, which they state is a stop-gap measure easily undone by wear and tear, a lack of proper maintenance or vandalism. They comment that the construction of **over 20 miles of fence as proposed by BLM will seriously disrupt pronghorn and deer habitat within the Five Springs, Dry Valley Rim, Buffalo Hills, Twin Peaks and Poodle Mountain WSA's.** They state that native ungulates have already been stressed by overgrazing and several years of drought and that even if they are able to successfully go over or under the proposed fences, this will require an inordinate amount of energy. They request that the following issues be considered in the EA: impacts upon the ecological, recreational, and aesthetic values of WSA's; impacts upon plant communities, soils, wildlife and other values following riparian fencing; and, the ecologic, economic, recreational, and aesthetic costs and benefits of pursuing the proposed action as opposed to other strategies (rest, changing the seasons of use, increased BLM/permittee monitoring, reduced AUM's, etc.).

**H.J. Whitaker** commented that although our efforts to restore damaged riparian and wetlands are laudable, construction in a proposed wilderness raises considerable concern. He states that before BLM embarks on such a project, he thinks a number of questions need to be thoroughly considered: 1) Will grazing fees even come close to the cost of building and maintaining the proposed fences? 2) Wouldn't it be cheaper simply to buy back the grazing leases and leave the land cattle free? 3) Aside from pronghorn and deer, what effect does cattle grazing have on other animal and plant species in the region? and, 4) Since other range developments have been allowed in the proposed wilderness in the past, what are the cumulative environmental and economic impacts of all of these projects?

**Sierra Club - Mother Lode Chapter - Shasta Group** stated that in general, the Sierra Club supports efforts to improve wet areas in the dry country of the proposed projects. They commented that they are concerned that any project involving a spring be done in a manner that protects all of the native biota found at that particular spring. They state that according to a dissertation by Don Sada, which they will make available to BLM, some of the springs in the area have fish and snail species that are specific to the sites, and that these should be noted and protected. They state that a complete native plant and animal (including invertebrates) species review at each project site be done by BLM specialists and outside experts such as Sada and that they would like to assist BLM in doing these species assessments. They comment that they are concerned about the proposed spring developments inside WSA's and have found that above-ground troughs made of man-made materials such as metal, plastic or fiberglass are unsuitable for use in potential wilderness. They state that troughs made of rock masonry no more than 1 foot above ground level would be acceptable to the Shasta group, provided that the water is piped underground and that the troughs are equipped with automatic shut-off devices to prevent run-off at the trough site. They comment that for all proposed spring developments, analysis needs to be done to guarantee adequate natural flow to the spring site for native species, including plants, fish and invertebrates. They state that a full archeological review of each spring site needs to be made and that these springs were often the location for Native American encampments prior

to the 1800's, and that important archeological features could be harmed without adequate field checks.

**State of Nevada - Department of Conservation and Natural Resources - Division of Wildlife** commented that **excluding livestock and wild horses from critical riparian habitat should provided immediate relief.** They stated that the project design suggests that spring head boxes will divert the water from the hydric soils and vegetation and that without adequate hydrology to the wetlands, the values to wildlife will be diminished. They recommend that the point of diversion be downstream and at the outer limit of the hydric soils. They stated that a properly designed project should allow riparian areas to achieve their potential. They commented that is was their observation in 1994 that Parsnip Spring was diverted to a pipeline and resulted in the loss of a meadow.



TWIN PEAKS ALLOTMENT  
PROJECT PROPOSALS

SITE MAP A

- Chimney Drift Fences
- West Parsnip Drift Fence
- East Fork Springs and Pipeline
- East Upper Smoke Creek Fence
- Horn Spring Meadow Exclosure
- Indian Spring Development

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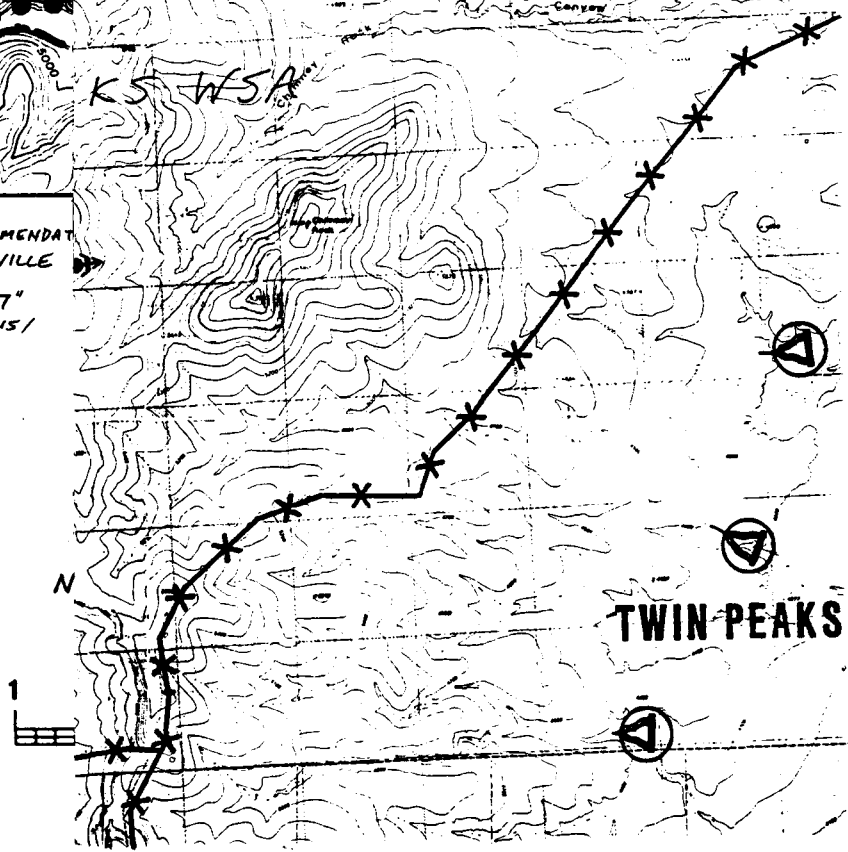
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**OBSERVATION**

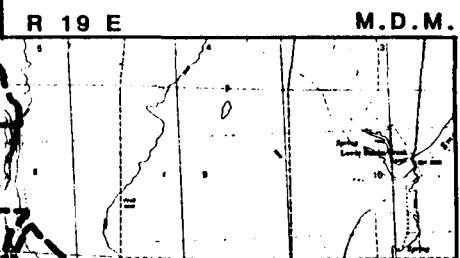
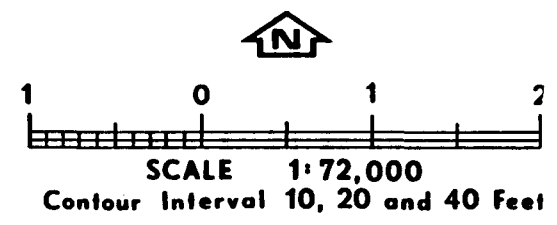
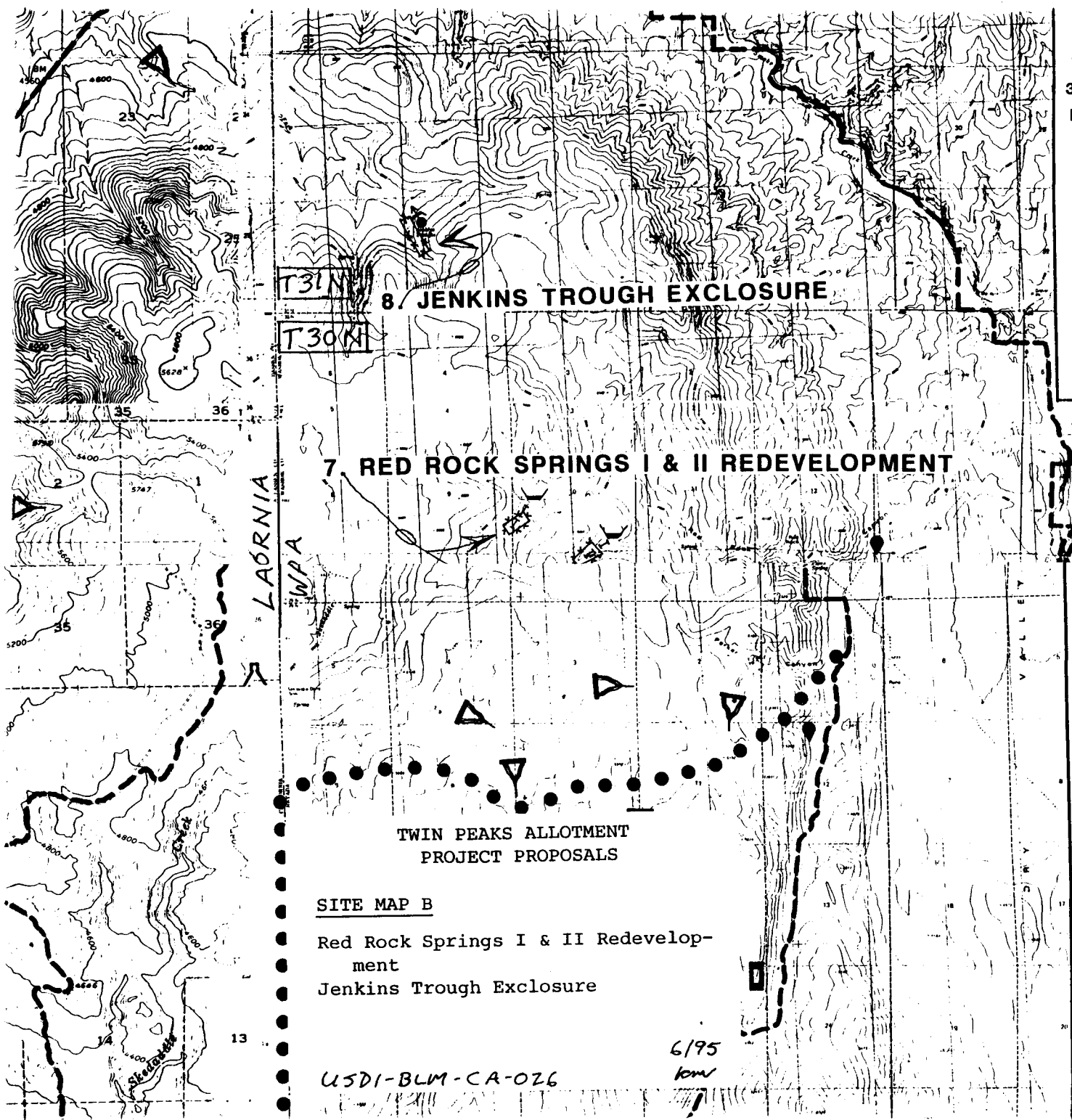
MAP SOURCE:  
"WILDERNESS RECOMMENDATION  
EAGLE LAKE-CEDARVILLE  
STUDY AREAS  
FINAL EIS: 1987"  
(WITH SOME ADDITIONS/  
MODIFICATIONS)

LEGEND

- WSA boundary
- Private land within WSA
- GRASS** Grazing allotment name
- Grazing allotment boundary
- Existing fence
- Pit reservoir
- Existing developed spring
- Proposed dam reservoir
- Dam reservoir







8 JENKINS TROUGH ENCLOSURE

7 RED ROCK SPRINGS I & II REDEVELOPMENT

LAORNIA  
WPA







TWIN PEAKS ALLOTMENT  
PROJECT PROPOSALS

SITE MAP B

Red Rock Springs I & II Redevelopment  
Jenkins Trough Enclosure

USDI-BLM-CA-026

6195  
low

-  Developed spring
-  Guzzler
-  Wild horse trap site
-  Existing dam reservoir
-  Proposed dam reservoir
-  Existing pit reservoir

MAP SOURCE:  
"WILDERNESS RECOMMENDATIONS  
EAGLE LAKE - CEDARVILLE STUDY  
AREAS  
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(WITH SOME ADDITIONS/MODIFICATIONS)

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TWIN PEAKS ALLOTMENT  
PROJECT PROPOSALS

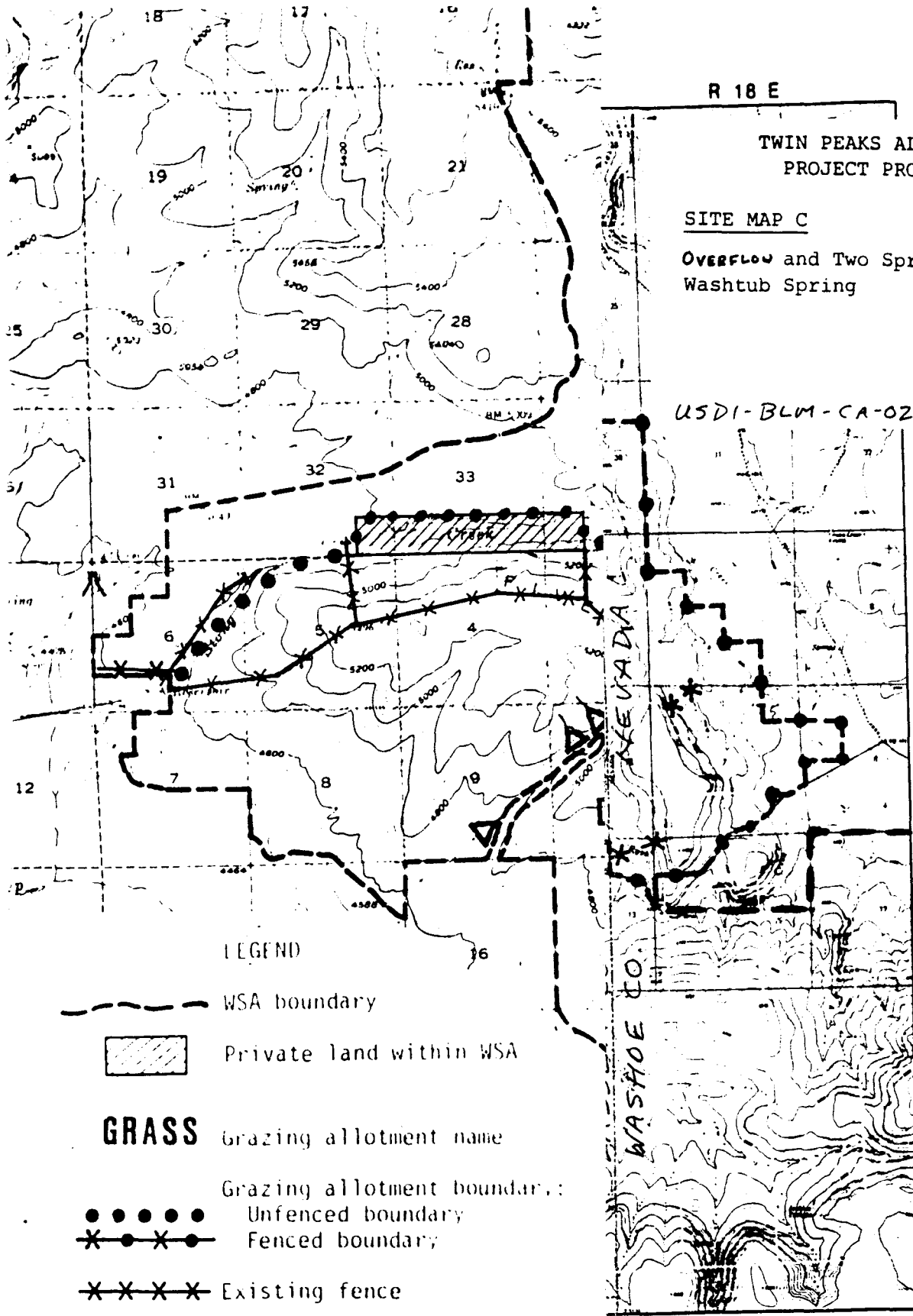
SITE MAP C

OVERFLOW and Two Springs Enclosures  
Washtub Spring

USDI-BLM-CA-026

6/95  
LOW

MAP SOURCE  
"WILDERNESS RECOMMENDATIONS  
EAGLE LAKE-CEDARVILLE  
STUDY AREAS  
FINAL EIS - 1987"  
(WITH SOME ADDITIONS/MODIFICATIONS)



LEGEND

- - - WSA boundary
- [Hatched Box] Private land within WSA

GRASS

Grazing allotment name

- Grazing allotment boundary: Unfenced boundary
- Grazing allotment boundary: Fenced boundary
- XXXXX Existing fence
- XXXXX Proposed fence

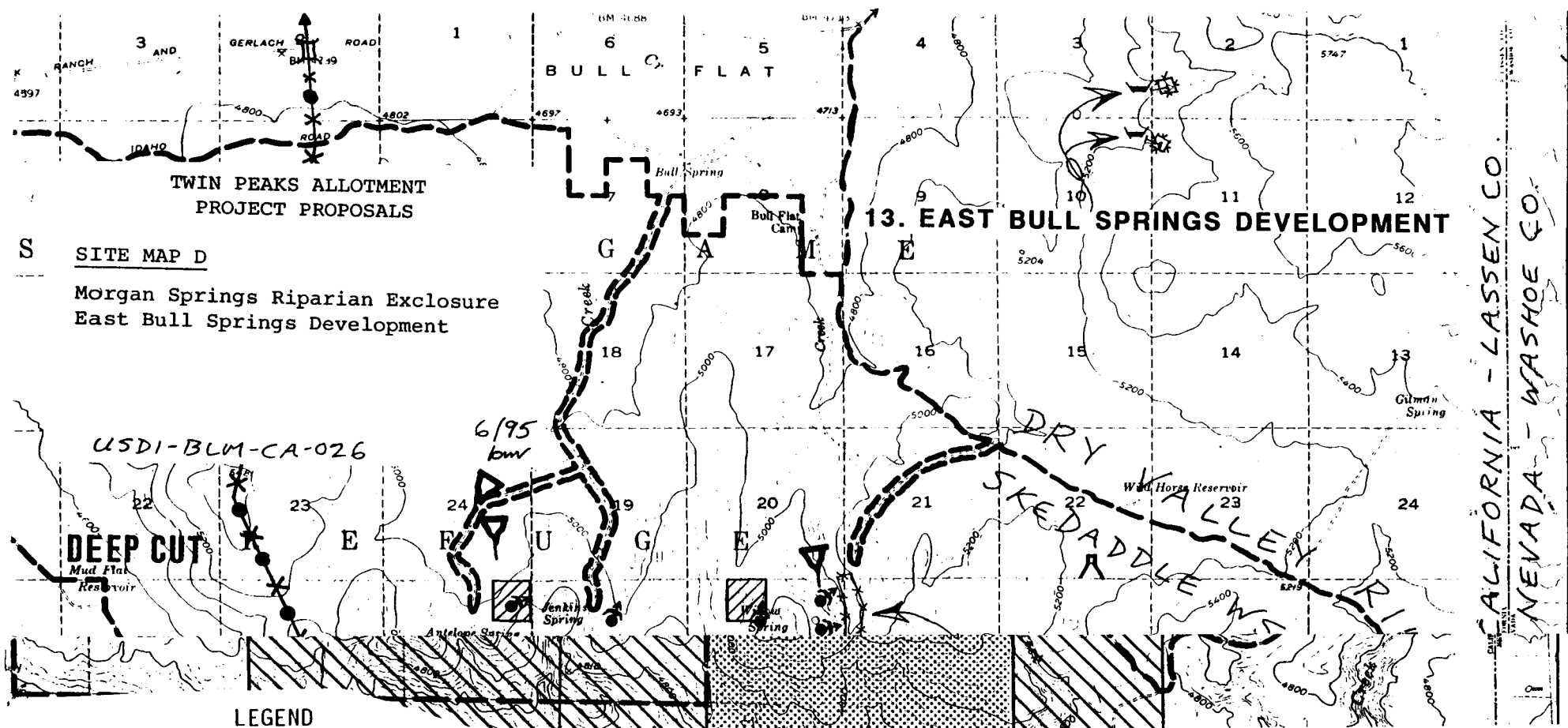
- ∧ Wild horse trap site (near WSA)
- ♂ Develop spring
- ▽ Dam reservoir
- Existing pit reservoir
- ⊕ Proposed pit reservoir

WASHOE CO. WYOMING

T  
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N



SCALE 1:62,500  
Contour Interval 20 and 40 Feet



TWIN PEAKS ALLOTMENT  
PROJECT PROPOSALS

S SITE MAP D  
Morgan Springs Riparian Exlosure  
East Bull Springs Development

USDI-BLM-CA-026

CALIFORNIA - LASSEN CO.  
NEVADA - WASHOE CO.

LEGEND

- WSA boundary
- Private land within WSA
- Lassen County public safety zone
- Military withdrawal

**GRASS**

Grazing allotment name

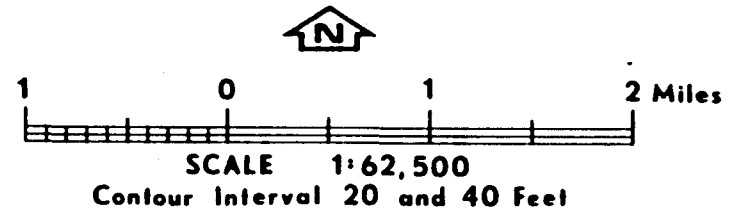
Grazing allotment boundary:  
fenced

unfenced

Fence

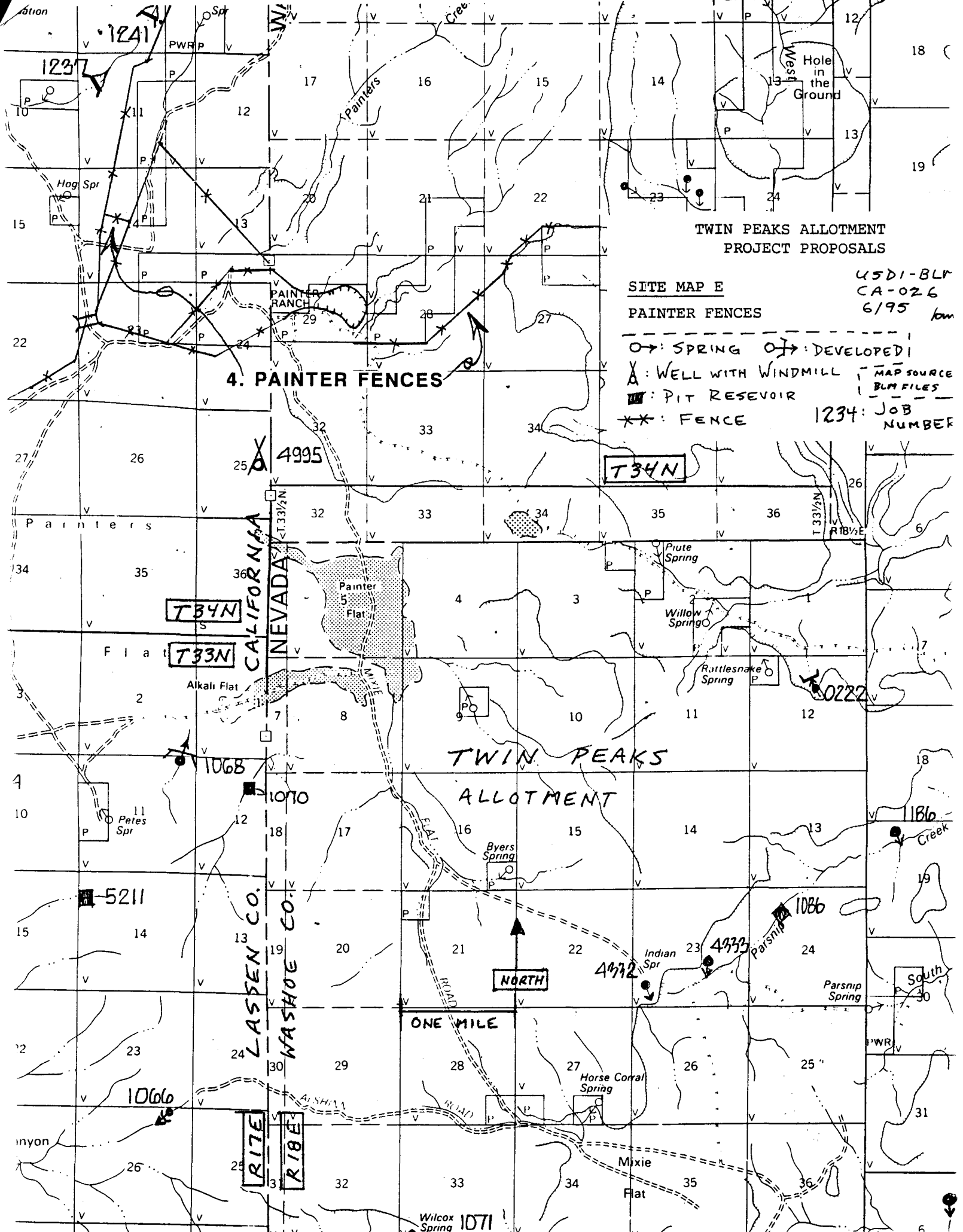
Wild horse trap site

- Developed spring
- Guzzler
- Proposed windmill
- Existing pit reservoir
- Existing dam reservoir
- Proposed dam reservoir



M.D.M

MAP SOURCE:  
"WILDERNESS RECOMMENDATIONS  
EAGLE LAKE/ CEDARVILLE  
STUDY AREAS FINAL EIS-1987  
(WITH SOME ADDITIONS/  
MODIFICATIONS)



**4. PAINTER FENCES**

**TWIN PEAKS ALLOTMENT  
PROJECT PROPOSALS**

**SITE MAP E**

**PAINTER FENCES**

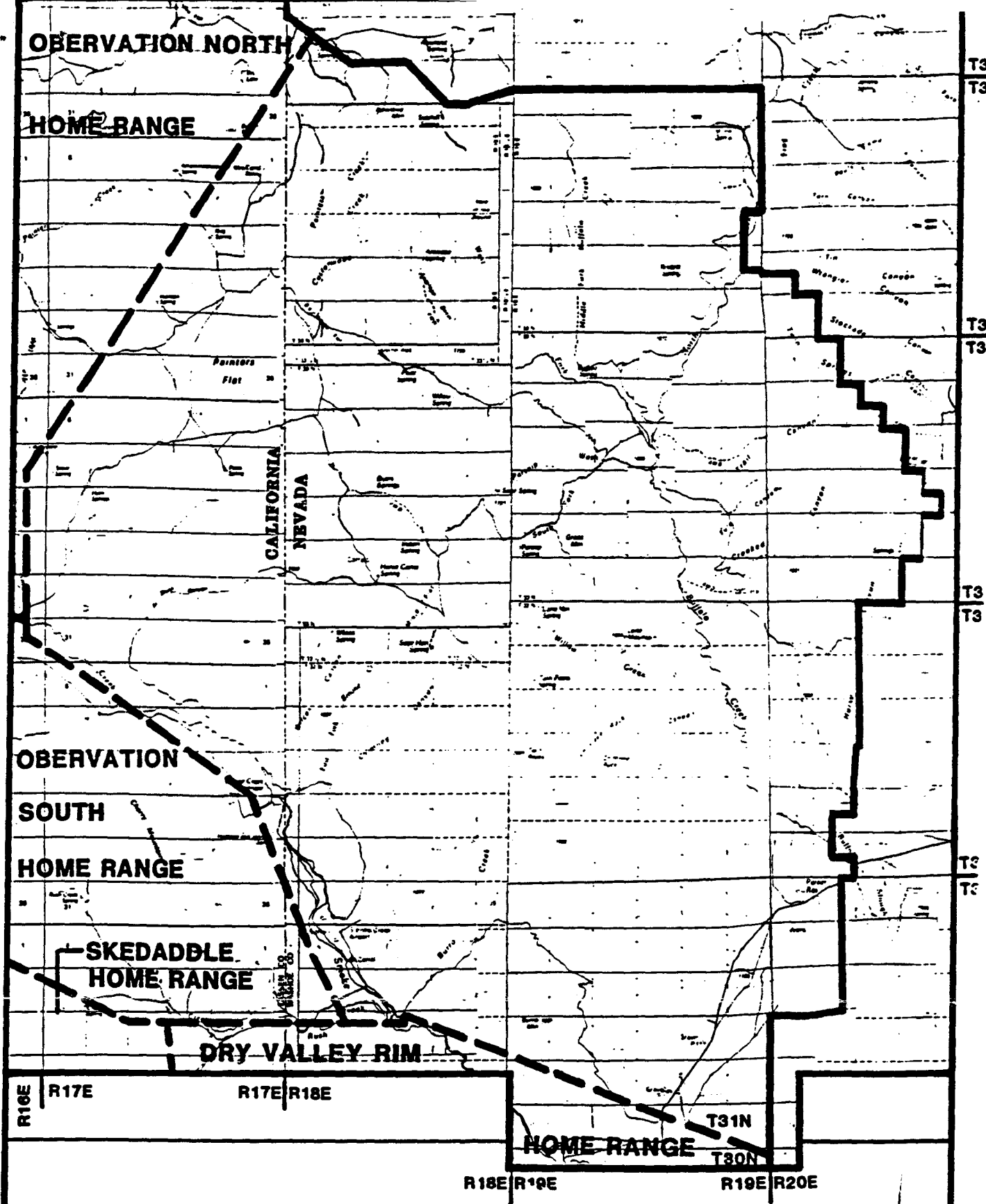
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- O: SPRING
  - O with arrow: DEVELOPED
  - X: WELL WITH WINDMILL
  - : PIT RESEVOIR
  - \*\* : FENCE
- MAP SOURCE  
BLM FILES  
1234: JOB NUMBER

**TWIN PEAKS  
ALLOTMENT**

**NORTH**

**ONE MILE**



 Herd Management Area boundary  
 Home Range boundary



UNITED STATES  
 DEPARTMENT OF THE INTERIOR  
 BUREAU OF LAND MANAGEMENT  
 CALIFORNIA STATE OFFICE  
 HERD MANAGEMENT AREA  
**TWIN PEAKS**  
**TWIN PEAKS NORTH HOME RANGE**



# United States Department of the Interior

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Eagle Lake Resource Area  
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EA-CA-026-95-07

### Appendix F

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**Intermountain Range Consultants representing John Espil Sheep Company** stated that they support the subject projects and it should be pointed out that the allotment subdivisions stated in the February Notice are not enclosed pastures but rather areas created for the purpose of discussing areas of similar vegetation and soil types. They commented that the Chimney Drift fences depicted on the maps enclosed with the Notice are located differently than previously discussed and "will also allow some control when the Bureau does rehabilitate portions of the



burned area in this locale." They state that the Chimney fence locations will need to be properly located on the ground so as not to create "traps" for horses and livestock. They state that as shown on the map, the fences may create problems and that they should be higher in the drainages and nearer to saddles, "etc.", but that these problems can be addressed by on-the-ground design. They commented that the Bullfrog Fence needs to be constructed to allow rapid removal of livestock up and out of the canyon via a side drainage, rather than in a location that requires the trailing of cattle all the way back down the canyon. They stated that the Parsnip fence is shown to be down in the basin and that in order to impede livestock drift from Painter and other areas without creating a concentration problem in the Parsnip Basin, the fence needs to be nearer the ridgeline to prevent cattle from entering the basin and "hanging" on the fenceline.

**The Sierra Club - Toiyabe Chapter** commented that they understood that "the Twin Peaks allotment has seriously degraded the public lands", especially the riparian areas in the region, and that they hope the BLM will address the entire problem, including a reduction in the livestock on the range. They state that this is an important area for mule deer and pronghorn and that the best management practices need to be instituted as soon as possible. Concerning the Chimney drift fences, they state they understand that gap fencing is allowed under BLM wilderness study area Interim Management Guidelines and under BLM Wilderness Management Policy, but that 4.5 miles of fence does not seem to come under the category of a gap fence and that they could find no explanation (in the Notice) of why a wire fence to control livestock movement between Chimney and Buffalo subdivisions would necessarily help the restoration of the riparian areas and that this needs to be explained. Concerning East Fork Springs and Pipeline, they commented that it is necessary to be very careful in any alterations they are made in these water sources. They asked if an inventory of snails, amphibians, insects and any other creatures that may live there, and of sensitive plants and cultural resources has been made. They stated that generally they believe that development in WSA's should only occur for the benefit of endemic wildlife and that such development needs to be done carefully to ensure that no degradation of the wilderness quality of the WSA occurs. They believe a field trip is needed for BLM to demonstrate what we have proposed. Concerning the Red Rock Springs I & II redevelopment and the Sagehen Spring redevelopment, they comment that these proposals have the same problems as the East Fork Springs and Pipeline and need the same attention. They question whether troughs in the uplands are necessary for the benefit of wildlife and are concerned that Red Rock Springs I & II redevelopment exceeds what is allowed in a WSA and would like to see a ruling from the State Wilderness Coordinator in Nevada on this question. They noted that the projects in California regarding spring developments and pipelines are in areas determined to be non-suitable whereas similar projects in Nevada are in areas "usually" deemed suitable, and hoped that the Nevada lands in WSA status managed by Susanville BLM will have equal protection (as those in California).

**California Mule Deer Association (CMDA)** stated that it appears that the projects are well beyond the scoping stage and are into the site specific stage and assume that the comments requested are scoping comments. They state that CMDA and the public have repeatedly been opposed to any project that may reduce the wilderness character of WSA's, particularly those

recommended for wilderness. They request that BLM provide written assurance that these projects will not impair the designation of recommended wilderness areas before continuing the planning process for these projects so as to comply with law and BLM policy. They commented that the Twin Peaks AOPs have clearly stated the aspen groves in the Skedaddles are to be completely avoided by any livestock and that the need to fence these areas demonstrates BLM's inability to control the livestock in the proposed project areas. They suggested the BLM take the necessary action to ensure that these areas are not used by livestock by designating the Skedaddles unsuitable for grazing based on inability to control livestock movement, and that BLM needs to deal with the source of the problem and not simply apply a band-aid reaction. They comment that as riparian areas provide a disproportional amount of livestock forage and that these areas will be made unavailable for livestock use (due to the proposed projects), subsequent AUM reductions are necessary to reflect this. They comment that due to excluding livestock from the proposed project areas, adjacent upland areas will receive an increase in livestock pressure from foraging, compacting and trampling, providing further stress to key shrub communities already identified as being in critical condition. They state that project planning must take this into account in analyzing suitability for the projects, and that BLM should deal with the source of the problem and not band-aid it. They state that the projects will cost the American taxpayer an excessive economic and environmental cost and request that BLM provide and accurate cost/benefit analysis for all proposed projects including subsequent impact to wildlife and all recreation opportunities. They comment that the entire project area lies within antelope and mule deer range and will have significant impacts to the species, particularly when cumulative impacts are analyzed considering degraded habitat conditions and caloric expenditures by wildlife, blocked passage to critical ranges, entrapment and entanglement. They state they find it difficult to accept the idea of fencing out sheep without fencing out deer and antelope simultaneously and that 3-way enclosure designs clearly point this out. They comment that a realistic and accurate analysis must be provided for direct, indirect and cumulative impacts to wildlife. They state that acknowledgement of BLM is needed as far as the dependability of fencing to exclude livestock based on decades of documented experience exhibiting the contrary. They comment that fences somehow get cut, broken down, blown over, torn down, left open, etc., etc., and ask what assurance, if any, can BLM provide to the public regarding required fence maintenance and what are the consequences to the parties responsible for fence maintenance if said maintenance is not provided. They state that fences on such a large scale are a bad public investment for the above-stated reasons. They suggest that the terms and conditions of the grazing permit be modified to provide specific requirements for areas to be avoided and if the livestock cannot be controlled to meet the terms and conditions, the permit should be cancelled. They comment that this alternative is the most economically and environmentally responsible answer to the public concerns and resource damage issues on this allotment.

**California Wilderness Coalition** commented that because the Twin Peaks allotment occurs in one of the wildest and most isolated areas of California and is the site of their proposed Smoke Creek Wilderness, preserving its ecological integrity is a high priority for their organization. They commented that they are concerned that the proposed actions may not be the best way to achieve the goals they support of improved riparian habitat, water quality and aquatic ecosystems in the Twin Peaks allotment. They stated that their observations of the allotment over the last

two years indicate that it is badly overgrazed and that remedying the situation calls for a reduction in AUM's, increased salting and riding on the part of the permittees, changing the seasons of use, resting the area and increased monitoring by BLM. They comment that these remedies are more likely to improve riparian and upland conditions than fencing, which they state is a stop-gap measure easily undone by wear and tear, a lack of proper maintenance or vandalism. They comment that the construction of over 20 miles of fence as proposed by BLM will seriously disrupt pronghorn and deer habitat within the Five Springs, Dry Valley Rim, Buffalo Hills, Twin Peaks and Poodle Mountain WSA's. They state that native ungulates have already been stressed by overgrazing and several years of drought and that even if they are able to successfully go over or under the proposed fences, this will require an inordinate amount of energy. They request that the following issues be considered in the EA: impacts upon the ecological, recreational, and aesthetic values of WSA's; impacts upon plant communities, soils, wildlife and other values following riparian fencing; and, the ecologic, economic, recreational, and aesthetic costs and benefits of pursuing the proposed action as opposed to other strategies (rest, changing the seasons of use, increased BLM/permittee monitoring, reduced AUM's, etc.).

**H.J. Whitaker** commented that although our efforts to restore damaged riparian and wetlands are laudable, construction in a proposed wilderness raises considerable concern. He states that before BLM embarks on such a project, he thinks a number of questions need to be thoroughly considered: 1) Will grazing fees even come close to the cost of building and maintaining the proposed fences? 2) Wouldn't it be cheaper simply to buy back the grazing leases and leave the land cattle free? 3) Aside from pronghorn and deer, what effect does cattle grazing have on other animal and plant species in the region? and, 4) Since other range developments have been allowed in the proposed wilderness in the past, what are the cumulative environmental and economic impacts of all of these projects?

**Sierra Club - Mother Lode Chapter - Shasta Group** stated that in general, the Sierra Club supports efforts to improve wet areas in the dry country of the proposed projects. They commented that they are concerned that any project involving a spring be done in a manner that protects all of the native biota found at that particular spring. They state that according to a dissertation by Don Sada, which they will make available to BLM, some of the springs in the area have fish and snail species that are specific to the sites, and that these should be noted and protected. They state that a complete native plant and animal (including invertebrates) species review at each project site be done by BLM specialists and outside experts such as Sada and that they would like to assist BLM in doing these species assessments. They comment that they are concerned about the proposed spring developments inside WSA's and have found that above-ground troughs made of man-made materials such as metal, plastic or fiberglass are unsuitable for use in potential wilderness. They state that troughs made of rock masonry no more than 1 foot above ground level would be acceptable to the Shasta group, provided that the water is piped underground and that the troughs are equipped with automatic shut-off devices to prevent run-off at the trough site. They comment that for all proposed spring developments, analysis needs to be done to guarantee adequate natural flow to the spring site for native species, including plants, fish and invertebrates. They state that a full archeological review of each spring site needs to be made and that these springs were often the location for Native American encampments prior

to the 1800's, and that important archeological features could be harmed without adequate field checks.

**State of Nevada - Department of Conservation and Natural Resources - Division of Wildlife** commented that excluding livestock and wild horses from critical riparian habitat should provided immediate relief. They stated that the project design suggests that spring head boxes will divert the water from the hydric soils and vegetation and that without adequate hydrology to the wetlands, the values to wildlife will be diminished. They recommend that the point of diversion be downstream and at the outer limit of the hydric soils. They stated that a properly designed project should allow riparian areas to achieve their potential. They commented that is was their observation in 1994 that Parsnip Spring was diverted to a pipeline and resulted in the loss of a meadow.

June 28, 1995

Note to File Re. Mailing:

The letter dated June 22, 1995, providing a comment synopsis and inviting for a field tour was mailed to the attached mailing list on June 22, 1995.

A handwritten signature in cursive script, appearing to read "Kenneth M. Visser".

Kenneth M. Visser

JOHANNA WALK  
NATURAL RES DEFENSE COUNCIL  
1350 NEW YORK AVE NW  
WASHINGTON DC 20005-4709

AMERICAN HORSE PROTECTION SOC  
P.O. 3586  
WASHINGTON DC 20007

LASSEN COUNTY  
COMMUNITY DEVELOPMENT DEPT  
707 NEVADA STREET  
SUSANVILLE CA 96130

DR SHERMAN SWANSON  
UNR RENEWABLE NATURAL RES  
1000 VALLEY ROAD  
RENO NV 89512

~~NEVADA WILDLIFE FEDERATION~~  
~~ATTN: FRED WRIGHT~~ ED WAGNER  
~~P.O. BOX 71238~~ MWE Stewardship  
~~RENO NV 89431~~ 2280 Armstrong Ed  
Reno, NV 89509  
329-8946

NEVADA HUMANE SOCIETY  
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SPARKS NV 89431-5354

INTERMNTN RANGE CONS  
ATTN: BOB SCHWEIGERT  
P.O. BOX 1033  
WINNEMUCCA NV 89445

NATIONAL RESOURCE CON SVC  
ATTN: STAN BOLTZ  
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RENO NV 89502

THE MULE DEER FOUNDATION  
ATTN: CRAIG LARSON  
1005 TERMINAL WAY STE 110  
RENO NV 89502

ROSE STRICKLAND  
SIERRA CLUB  
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RENO NV 89503-5903

JEAN LOUBET  
LASSEN COUNTY SUPERVISOR  
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MOUNTAIN LION FOUNDATION  
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WILD HORSE ORGANIZED ASSISTANCE  
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CA DEPARTMENT OF FISH & GAME  
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GEORGE BERRIER  
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RIO OSO CA 95674  
916-742-1901

CA DEPT OF FISH & GAME  
1416 9TH STREET  
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BUREAU OF LAND MANAGEMENT  
ATTN: BRANCH CHIEF BIO. RES.  
2800 COTTAGE WAY  
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NEVADA DIV OF WILDLIFE  
380 WEST B STREET  
FALLON NV 89406

LASSEN SPORTSMEN'S CLUB  
ATTN: JOHN GAITHER  
713-260 SEARS ROAD  
JANESVILLE CA 96114

LAVER RANCH  
c/o RON LAVER  
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BOARD OF SUPERVISORS  
220 S LASSEN STREET  
SUSANVILLE CA 96130

JOHN ESPIL  
P.O. DRAWER N  
SUSANVILLE CA 96130

CA DEPT OF FISH & GAME  
ATTN: FRANK HALL  
728-600 FISH AND GAME ROAD  
WENDEL CA 96136

LASSEN COUNTY FISH & GAME CO.  
707 NEVADA STREET  
SUSANVILLE CA 96130

ORGANIZED SPORTSMEN  
LASSEN COUNTY  
P.O. BOX 467  
SUSANVILLE CA 96130

COMMISSION FOR THE PRES OF WH  
c/o CATHY BARCOMB  
255 W. MOANA LN STE 207A  
RENO NV 89509

ANIMAL PROTECTION INST. OF AMERICA  
2831 FRUITRIDGE ROAD  
P.O. BOX 22505  
SACRAMENTO CA 95822

STEPHANIE LIGHT  
NEVADA WOOLGROWERS ASSOC  
339 W. ROCKWOOD DR  
ELKO NV 89801

WILLIAM MOLINI  
NV DIVISION OF WILDLIFE  
P.O. BOX 10678  
RENO NV 89520-0020

TWIN PEAKS AFFECTED INTERESTS

6/22/95 Mailing

1 of 5

INT'L SOC FOR PROT OF MUSTANG/BURROS  
c/o KAREN SUSSMAN  
6212 EAST SWEETWATER AVENUE  
SCOTTSDALE AZ 85254

TOM BALLOW  
NV DEPT OF AGRICULTURE  
P.O. BOX 11100  
RENO NV 89510

WASHOE COUNTY  
BOARD OF COMMISSIONERS  
P.O. BOX 11130  
RENO NV 89520

RAY BUTLER  
CA NATIVE PLANT SOCIETY  
7006 WESTPORT STREET  
RIVERSIDE CA 92506

MATT BAILEY  
SIERRA CLUB, MOTHER LODE CHPTR  
P.O. BOX 186  
DUTCH FLAT CA 95714

DAN MACON  
CALIFORNIA CATTLEMEN  
1221 H STREET  
SACRAMENTO CA 95814

DON COOPS  
P.O. BOX 159  
CEDARVILLE CA 96104

GLENN NADER  
COOP EXT, LASSEN COUNTY  
LASSEN CNTY MEMORIAL BLDG  
SUSANVILLE CA 96130

RICH ELLIOT  
CA DEPT OF FISH & GAME  
601 LOCUST STREET  
REDDING CA 96001

DAN MCGINN  
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1673 FRUITVALE ROAD  
LINCOLN CA 95648

VIVIAN VAUGHT  
SIERRA CLUB-CALIFORNIA  
3140 DEL PASO BLVD  
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JOHN R. HANSON  
LASSEN CNTY CATTLEMEN ASSOC  
490-800 HORSE LAKE ROAD  
SUSANVILLE CA 96130

WALLY HERGER  
US CONGRESSMAN 2ND  
55 INDEPENDENCE CIRCLE SEE 104  
CHICO CA 95926

SENATOR TIM LESLIE  
FIRST SENATE DISTRICT  
1200 MELODY LANE #110  
ROSEVILLE CA 95678

CONGRESSWOMAN BARBARA VUCANOVICH  
SECOND DISTRICT NEVADA  
300 BOOTH ST RM 3030  
RENO NV 89509

*7000*

AL WRIGHT  
ASD BUREAU OF LAND MANAGEMENT  
2800 COTTAGE WAY RM E-205  
SACRAMENTO CA 95825

*New*

WASHOE-STONEY CON. DISTRICT  
GAYLE BOWERS, CHAIRWOMAN  
1201 TERMINAL WAY, STE 222  
RENO NV 89502

*This list matches:  
Turn Peaks affected in forests 2/95*

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PAUL CLIFFORD J0328  
2955 BERKSHIRE  
CLEVELAND HGHTS OH 44118

AMERICAN WILDERNESS J0322  
ALLIANCE  
ATTN: CLIFTON B. MERRITT *delete*  
7600 E. ARAPAHOE RD SUITE 114  
ENGLEWOOD CO 80112

THOMAS & SHEILA GAST J0291  
ENVIRONMENTAL MGMT SERVICES  
P.O. BOX 8626  
FORT COLLINS CO 80524

FRIENDS OF NEVADA WILDERNESS J0413  
P. BOX 19777  
LAS VEGAS NV 89132

NV DEPT OF WILDLIFE J0340  
ATTN: RICH HEAP  
380 WEST "B" STREET  
FALLON NV 89406 *duplicate*

TINA NAPPE J0292  
SIERRA CLUB  
3340 BERTHOUD  
RENO NV 89503

DISPLAY MEMORYD J0293  
SIERRA CLUB  
ROSE STRICKLAND  
619 ROBINSON COURT  
RENO NV 89503-5903 *duplicate*

SIERRA CLUB J0294  
TOIYABE CHAPTER  
P.O. BOX 8096  
RENO NV 89507

FRIENDS OF NEVADA WILDERNESS J0414  
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RENO NV 89507

JIM YOUNG J0354  
920 VALLEY ROAD  
RENO NV 89512

WASHOE COUNTY J0352  
COMMISSIONERS  
WASHOE COUNTY COURTHOUSE  
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STATE DIRECTOR J0356  
NEVADA STATE OFFICE  
BUREAU OF LAND MANAGEMENT  
P.O. BOX 12000  
RENO NV 89520

NV WILDLIFE FEDERATION J0343  
NORTHERN VICE PRESIDENT  
ATTN: GALE DUPREE  
216 E. HAMPTON DRIVE  
CARSON CITY NV 89701 *duplicate*

CHARLES S. WATSON J0295  
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NV OUTDOOR RECREATION ASSOC.  
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CARSON CITY NV 89702

LESLIE FRIEDMAN J0296  
THE NATURE CONSERVANCY  
785 MARKET STREET, 3RD FLOOR  
SAN FRANCISCO CA 94103

SIERRA CLUB J0348  
LEGAL DEFENSE FUND, INC.  
ATTN: LAURENS SILVER  
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SAN FRANCISCO CA 94104-4230

JOAN REISS A4127  
REGIONAL DIRECTOR  
THE WILDERNESS SOCIETY  
116 NEW MONTGOMERY #526  
SAN FRANCISCO CA 94105

JOHANNA WALD C1475  
NATURAL RES DEFENSE COUNCIL  
71 STEVENSON ST SUITE 1825  
SAN FRANCISCO CA 94105 *delete*

HARRIET BURGESS J0297  
VICE PRESIDENT  
THE TRUST FOR PUBLIC LAND  
116 NEW MONTGOMERY, 4TH FLOOR  
SAN FRANCISCO CA 94105

OREGON-CALIFORNIA J0345  
TRAILS ASSOCIATION  
C/O TOM HUNT  
950 OLD TRACE ROAD  
PALO ALTO CA 94306

JEFF BLEWETT J0422  
N. DISTRICT ENVIRONMENTAL  
AFFAIRS CHAIRMAN  
1328 S. LEE STREET  
LODI CA 95240

REDWOOD CHAPTER J0299  
SIERRA CLUB  
P.O. BOX 466  
SANTA ROSA CA 95402

RON GUENTHER J0300  
REDWOOD CHAPTER  
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DAVE DRELL J0301  
CITIZEN'S COMMITTEE TO SAVE  
OUR PUBLIC LANDS  
P.O. BOX 1471  
WILLITS CA 95490

4 of 5



CA Dept. of Fish & Game  
Attn: Frank Hall  
728-600 Fish & Game Road  
Wendel, CA 96136

*Duplicate*

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Sacramento, CA 95814

Sierra Club - Toiyabe Chapter  
c/o Marjorie Sill  
720 Brookfield Drive  
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Sierra Club - Mother Lode Chapter  
Shasta Group c/o Stan Weidert  
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Redding, CA 96049