

Rose Strickland 2/6/84

Dear Dawn

My source came through.
The greedy bastards control 95%
of the public lands. They are now
going after the last 5% - no
wilderness, wild horses, or wildlife
just cows!

They are attacking wildlife
data just like they did the
inventories!!

NRDC + SC are protesting!

Rose

2/1/84

NEVADA GRAZING BOARD of DISTRICT #1
Post Office Box 52
Elko, Nevada 89801

Phone 702/738-8997

February 1, 1984

Mr. Robert Burford, Director
Bureau of Land Management
1800 C Street, N.W.
Washington D.C. 20240

Re: Proposed Wells RMP and Final Grazing EIS

Dear Mr. Burford;

The Nevada Grazing Board of District N-1, Post Office Box 52, Elko, Nevada 89801, phone 702/738-8997 is protesting parts of the Wells Resorce Management Plan. The interest of the Grazing Board is to assure good grazing management, compliance with the multiple use concept and fair and equitable treatment for livestock operators.

The issues and parts of the plan being protested are listed below together with a reference to the document or other input into the planning process and a statement expressing why we believe the State Director's decision is wrong. We have numbered the supporting documents as exhibits and have referred to them by number in the discussion. These exhibits are:

1. Letter from this Board to Rodney Harris, Elko District Manager, dated August 8, 1983;
2. Comments on the draft RMP/EIS, submitted by this board on August 12, 1983;
3. The 'Sixth Alternative', prepared by this Board and submitted on August 12, 1983;
4. Verbal testimony given by our consultant at the public hearing held in Wells, Nevada on June 21, 1983;
5. Letter from our consultant to Rodney Harris, dated December 16, 1982;
6. Letter from our consultant to Rodney Harris, dated January 11, 1983;

7. Comments on Planning Criteria, contained in a letter dated February 24, 1981 from our consultant to Rodney Harris.

RMP ISSUE #5-Wilderness:

1. We protest the decision to recommend four Wilderness Study Areas, totalling 159,881, acres as being 'preliminarily suitable for wilderness designation'.

For related statements see: Pages 7 and 8 of Exhibit #2; Exhibit #3; Exhibit #4; and Exhibit #6.

We believe the State Director's decision is wrong because designation as wilderness will interfere with other resource uses of the areas and because the WSAs are not truly wilderness quality. Our comments listed above discuss these reasons in greater detail.

RMP ISSUE #6-Livestock Grazing:

1. We protest the use of the three to five year average licensed use as the base number from which reductions or increases in grazing permits would be made.

For related statements see: Pages 7 and 8 of Exhibit #2; Exhibit #3; Exhibit #4; and Exhibit #6.

We believe the State Director's decision is wrong because no consideration was given to the fact that in most cases these arbitrary numbers have little or nothing to do with the condition of the range or with the ability of the allotment to produce forage for livestock and wildlife. We have a strong fear that these numbers will become the new permitted number where three years of monitoring does not indicate an upward trend on a few 'key areas' that may or may not have been properly located to reflect the use and potential on the allotment.

2. We protest the plan to increase grazing above the three to five average use on only four of the eighty nine allotments. Range seeding would be done to give three of these four allotments substantial increases above active preference. The RMP does not say how forage would be developed to allow the small increase on the third.

No previous comments were made on this issue because the information was not disclosed in the draft RMP/EIS.

The State Director's decision on this matter is wrong because it is unfair to other users. Our position is that the necessary work should be planned to bring AUMs to full preference on ALL allotments where the potential exists, where no serious environmental damage will occur and where the operator is willing to actively participate in the planning and installation of the needed practices.

3. We protest the placement of allotments in an MIC category without consultation with the livestock operator involved and with only minor consideration being given to existing range condition, trend, watershed condition and potential for improvement.

For related statements see: Pages 3, 9 and 10 of Exhibit #2; Exhibit #3; Exhibit #4; and Exhibit #5.

The State Director's decision is wrong because it allows the lumping together of the three most important criteria (condition, trend and potential) in making the important decision on categorization. The decision is wrong because it allows stand the assignment of categories without even discussing the matter with the livestock operator. The operator is the one who knows the allotment best, and he is the one who will either make the range program succeed or fail.

4. We protest the minimal amount of range improvement work planned, the limitation of vegetative treatment to only eighteen of the eighty nine allotments and the inclusion of only short term goals for range improvements.

For related statements see: Page 9, 10 and 13 of Exhibit #2; and Exhibit #3.

The State Director's decision is wrong because: more water developments are needed to improve the distribution of livestock, wildlife and horses; vegetative treatment, particularly brush control through burning or spraying, is needed to enhance vegetation for livestock and wildlife on parts of nearly every allotment; and range improvement work should be accomplished over a period of several years to minimize the disruptions to wildlife and livestock, to limit damages in case of failure of the practice and to make it easier for operators to finance their share.

5. We protest the addition of the column headed 'Estimated Production' in table A-3 of the final document.

This is a new issue raised by an unreviewed modification to the final RMP/EIS document.

The State Director's decision to include this information in the final document is wrong for the following reasons:

a. The field data collected was not accurate. Our consultant monitored the progress of this survey while it was being conducted and detected many inconsistencies, errors in judgement and other problems but certainly did not find them all. Survey supervisors made efforts to correct most of those specific problems reported to them, but did little to prevent a reoccurrence of the problem and apparently made no effort to spot-check the field data on their own.

b. The computer program used to analyze and summarize the data is complex, contains questionable procedures and uses numerous arbitrarily assigned adjustment factors. The use of this program was prohibited by a Washington Instruction Memorandum dated December 2, 1982.

c. The results obtained from a and b above, and printed in table A-3 are in many cases completely ridiculous. For example, for the Hot Creek allotment Table A-3 lists the 3 to 5 year average use as 4,137 AUMs while the estimated production is listed as only 1,941 AUMs. This allotment is under an AMP with a fully functional 3 pasture rest-rotation grazing system that has resulted in an obvious improvement in range condition.

The year of the survey, the cows started leaving the early use field on August 10, about 2 weeks after the survey was completed.

An analysis of the field data from the survey shows an average utilization estimate of 30% on the use field. This certainly does not sound like an allotment that is producing less than one-half the amount of forage needed to support the number of livestock that have been using it! While this is probably the most striking example, we have data documenting a similar situation on several other allotments.

c. The inclusion of this erroneous information serves no purpose other than to inflame the environmentalist camp and lend support to their position that the range is being desecrated by the

ranchers with the help of the BLM.

d. The inaccuracy of the survey is illustrated by the RMP decision to do range seeding on two of the four allotments scheduled for increase above the 3-5 year use. The survey shows these allotments to have more forage than their preference calls for without seeding. However, those responsible for developing the plan must think that more grass is needed.

6. We protest the inflexibility implied by the dates specified for livestock grazing treatment number 8 under Specific Implementation Procedures.

For related statements see: Page 4 of Exhibit #2; and Exhibit #6.

The State Director's decision is wrong because the calendar dates specified may not fit every winterfat and/or Nutall saltbush site in the resource area and because complete growing season deferral every year has not been proven to be essential to the maintenance of a healthy, productive stand of these species. The grazing period should be established on a case by case basis, depending on the location, the kind of grazing pattern or system being carried out and on climatic conditions during a particular year.

7. We protest the lack of consideration for or even mention of the AUM's held in suspended non-use.

For related statements see: Pages 10 and 11 of Exhibit #2; and Exhibit #3.

The State Director's decision is wrong because these AUM's may constitute a significant portion of the value of a ranch operation and their loss could have a serious economic effect. Our position is that suspended AUMs should be restored through range improvements wherever practicable. (See item 2, above.)

RMP ISSUE #7-Wildhorses:

1. We protest the objective of managing six horse herds with a population ranging between 550 and 700 head.

For related statements see: Exhibit #3; and Exhibit #6.

The State Director's decision is wrong because 550 head

substantially exceeds the number of horses projected to have been present in 1971. This number of horses, running on the range for twelve months of the year will do tremendous damage to the resources. Much of the area inhabited by horses has white sage and Nuttall saltbush. If livestock must be removed from these areas during the growing season, it seems reasonable that heavy horse use should not be allowed during that period.

RMP ISSUE #8-Terrestrial Wildlife Habitat:

1. We protest the modification of 650 miles of fence to meet wildlife standards.

For related statements, see: Exhibit #3.

The State Director's decision is wrong because the modified fences do not contain livestock as well as standard fences and they may require more maintenance. The modification of this amount of fence is a waste of money. Our position is that the fences across migration routes and in critical locations should be considered for modification, but that most fences should be left alone.

2. We protest the proposals to 'manage' 2,600 acres of non-aquatic riparian habitat and 1,000 acres of mountain mahogany and the proposal to 'improve' 55,500 acres of 'crucial' big game habitat without stating the kind of work being considered, where it would be done and what effect it would have on other resources and resource uses.

For related statements see: Page 15 of Exhibit #2; and Exhibit #3.

The State Director's decision is wrong because it is impossible to evaluate the effect the proposed practices will have on other resources and resource uses unless the practices are described in greater detail. These practices should not be exempt from review just because they are wildlife oriented.

3. We protest the adoption of the Western State's Sagegrouse Guidelines as the specifications to be followed in sagebrush modification projects.

For related statements see: Page 4 of Exhibit #2; Exhibit #3; Exhibit #4; and Exhibit #6.

The State Director's decision is wrong because Standard Operating Procedure number 9 states that treatment will be in accordance with procedures 'specified' in the Guidelines. Even some Nevada Department of Wildlife personnel consider the document to be just guidelines, not specifications and agree that each case should be judged on its merits.

4. We protest the inclusion of erroneous numbers represented as being the total reasonable numbers and total existing numbers for the four big-game species.

For related statements see: Exhibit #1; Page 16 of Exhibit #2; and Exhibit #4.

The State Directors's decision is wrong because the numbers in the table are wrong. You don't add the number of animals using winter range to the number of animals using summer range and that

total to the number using spring range to find out how many animals you have. These numbers also include animals that are using significant areas of privately owned lands, namely areas DY-4, DS-5, DSP-1 and the entire checkerboard pattern area. Exhibit #1 was written specifically to call BLM's attention to these errors. The problem was also discussed in Exhibit #2 and Exhibit #3. In spite of this, they still made the same error in addition and still claim that BLM feeds the deer herds that occupy private land.

5. We protest the setting of goals for the improvement of wildlife habitat without considering the capability of the land to produce desirable habitat characteristics and without knowledge of the actual trend in the condition of those habitats.

For related statements see: Pages 16, 17 and 18 of Exhibit #2; Exhibit #4; and Exhibit #5.

The State Director's decision is wrong because BLM evaluates wildlife habitats by rating several habitat elements numerically in relationship to the ideal or optimum situation for a particular wildlife species. These ratings are totalled and a condition class based on the percentage of optimum is assigned. No consideration is given to the ability of the area to produce the attributes desired for optimum condition habitat. Therefore, there is no way of knowing that a particular goal is realistic.

6. We protest the inference that livestock grazing is the primary cause of poor wildlife habitat conditions.

For related statements see Page 18 of Exhibit #2 and Exhibit #6.

The State Director's decision to allow this thinking to be repeated several places in the document is wrong because livestock grazing is just one of many factors that affect the condition of wildlife habitat. Once a less than factual inference is published, it gains respectability and is often quoted and used as evidence by those whose purpose it best suits.

RMP ISSUE #9-Riparian/Stream Habitat:

We protest the proposal to 'improve' 95.5 miles and 2,518 acres of 'deteriorated' riparian/stream habitat to at least good condition.

For related statements see: Pages 14 and 19 through 21 of Exhibit #2; Exhibit #3; Exhibit #4; Exhibit #6 and Exhibit #7.

The State Director's decision is wrong because the RMP/EIS document does not describe the proposed treatment. The decision is wrong because there has not been sufficient study and investigation by a multi-disciplinary team to determine:

(a) That all of these streams are in fact degrading under existing conditions;

(b) That all of these streams have the potential to support good or better condition using the rating system upon which the present rating is based;

(c) That the proposed treatment will be effective on all these streams; and

(d) The physical, economic and environmental effect the proposed treatment will have on other resources and resource uses in the short-term and in the long-run.

GENERAL:

1. We protest the BLM's failure to respond to comments by making meaningful changes in the RMP.

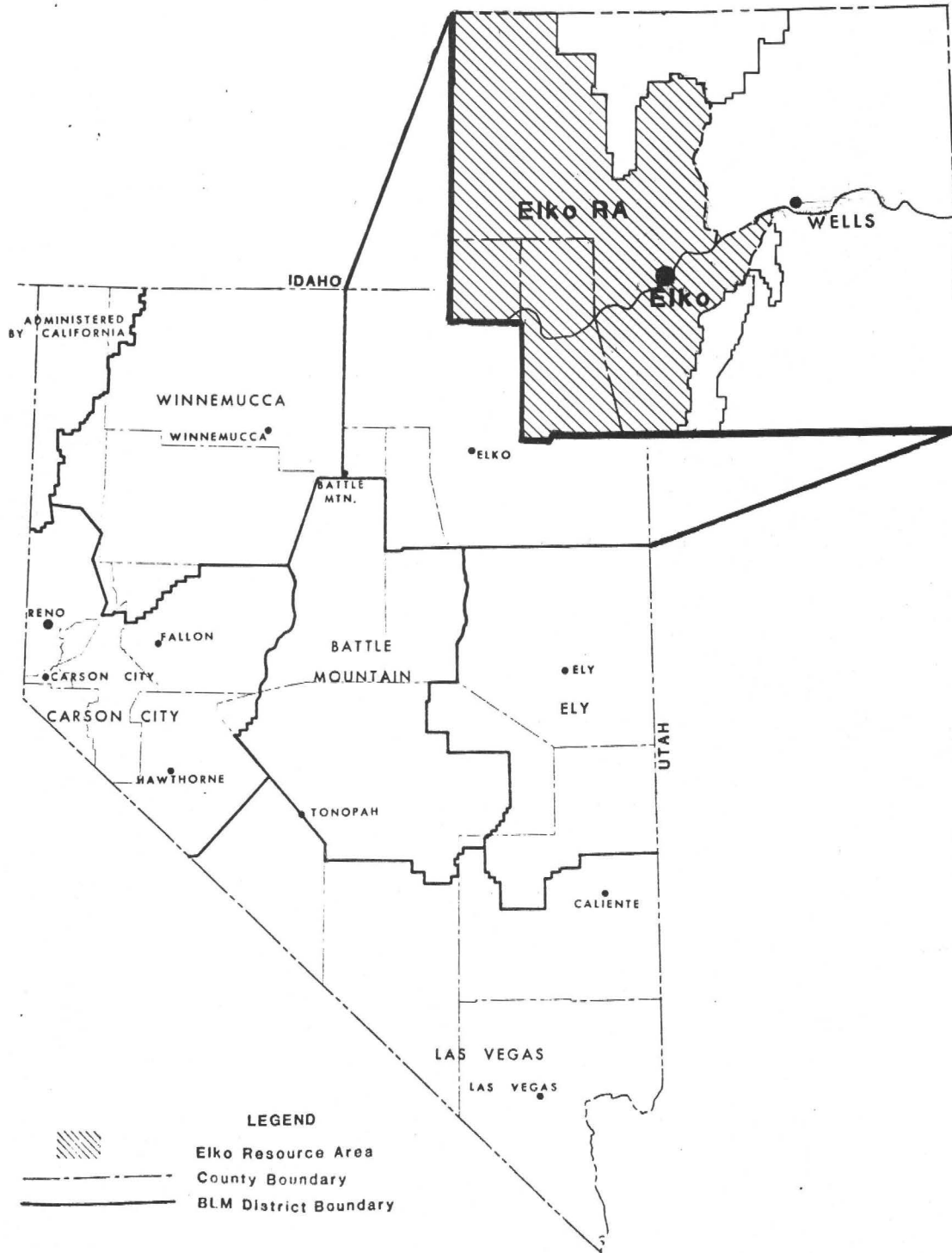
2. We protest the BLM's failure to adequately address the alternative proposed by this organization and endorsed by several of those submitting written comments on the draft RMP/EIS.

We would appreciate your serious consideration of the points being protested above.

Sincerely,

Roy Young, Chairman
Nevada N-1 Grazing Board

ELKO DISTRICT





United States Department of the Interior

IN REPLY REFER TO

BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
P.O. Box 831
Elko, Nevada 89801
702-738-4071

1601(NV-010)

Dear Interested Reader:

A few months ago you helped us identify resource management issues for public lands within Elko Resource Area. These issues were expressed in 38 issue identification forms and letters and through informal means, such as discussions with many of you in the field and office or over the telephone. In addition, our staff expressed management concerns which were incorporated with your issues.

Through this review process, a total of eleven issues have been identified for analysis in the resource management planning process. These issues represent those resources and uses on which planning efforts will be concentrated.

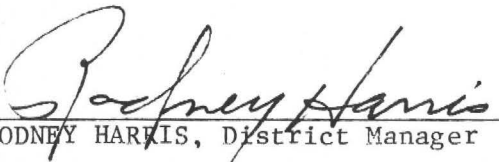
In response to these resource management issues, we have documented the proposed planning criteria that will influence resource management and uses. Planning criteria take the identified issues one step further by defining the specific concerns about each issue. Planning criteria serve to additionally concentrate and focus decisionmaking, analysis and data collection through all subsequent steps in the planning process. Planning criteria also provide guidelines to use in establishing the range and content of alternatives and in eventually selecting the preferred alternative.

We would like your evaluation and comments on these proposed criteria. If you have comments, please send them to the address above by May 20, 1984.

Our next step is preparation of the analysis of the management situation. In this stage, inventory information describing the condition of the resources is presented along with documentation of social and economic factors relative to the planning issues. If you have information which may contribute to this analysis, please contact us by June 1, 1984.

You will continue to be informed of progress on this planning effort. Thank you for your interest and assistance.

Sincerely yours,



RODNEY HARRIS, District Manager



TIM HARTZELL, MANAGER,
Elko Resource Area

Introduction:

Issues drive the Resource Management Plan and indicate the significant concerns both the public and BLM have for the planning area. Planning criteria are prepared to ensure that the plan is tailored to the identified issues. Planning criteria are used to evaluate all subsequent planning steps. They are based on a number of factors including laws, regulations, Bureau policy and guidance and the principles of multiple use and sustained yield set forth in the Federal Land Policy and Management Act (FLPMA) of 1976.

Issue No. 1: Lands and Realty

Requests have been made by the public to identify lands suitable for disposal through sales, exchanges, and applications under the Recreation and Public Purposes Act within the Elko Resource Area.

Planning Question

Which lands should be identified for disposal or retention:

Planning Criteria

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

Category I - Lands which will be retained in Federal ownership and will not be considered for sale.

Category II - Lands which will be considered for sale, exchange, or applications under the Recreation and Public Purposes Act.

- a. Propose sale of a parcel of land if:

- The lands are isolated from other public lands and there is no legal access,
- The lands are needed for community expansion,
- Disposal would serve important public objectives that would outweigh the public objectives and values served by retention.

- b. Consider lands for exchange if the non-Federal offered lands contain resource values, such as important wildlife habitat, recreation potential, or where an exchange would improve grazing management, land ownership pattern and resource administration.

2. In identification of lands suitable for community expansion and other public use, the following shall be considered:

- a. Local community expansion and economic development,
- b. Whether the physical capabilities of the public lands are adequate to support actions needed to meet the stated objectives of the community,

- c. The consequences of BLM actions needed to assist the community in meeting its objectives (e.g. socio-economic impacts, impacts on resources, impacts on existing land uses and land users), and
- d. The potential of private lands assisting the community in meeting its objectives.

Issue No. 2: Corridors

The opportunity exists for formal designation of utility corridors under the authority of Section 503 of FLPMA and in accordance with the Western Regional Corridor Study prepared by the Western Utility Group. Such designation could serve to minimize width requirements for rights-of-way and maximize multiple occupancy. Therefore the suitability of lands to accommodate future utility corridors needs to be addressed.

Planning Question

What areas should be recommended for utility corridors?

Planning Criteria

1. Designate corridors for major facilities in areas that meet the following criteria:
 - a. Have existing major facilities,
 - b. Have been identified by the Western Regional Corridor Study for a potential corridor,
 - c. Are technically and economically suited for such uses,
 - d. Correspond with designated corridors in other planning areas, and
 - e. Do not have significant resource values that would be adversely impacted. Areas having significant values could include lands with wilderness potential, Areas of Critical Environmental Concern designation, and/or threatened or endangered species habitat.
2. Give priority to corridor designation in the following order:
 - a. Use existing transmission line rights-of-way with sufficient width to upgrade existing facilities and permit further expansion.
 - b. Follow existing secondary highways and railroads, if technically or economically feasible.
3. Identify planning corridors in areas with no major facilities that meet the following criteria:
 - a. A need is demonstrated to place a facility within a certain area, and

- b. Identify land areas suitable for future corridors in accordance with the Western Regional Corridor Study. The width, location, and number may vary according to need. The corridors may specify a particular width or may designate a beginning and ending point with approximate route.

Issue No. 3: Access

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

Planning Question

Where is access needed to facilitate resource management and public uses?

Planning Criteria

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

Issue No. 4: Recreation

The Elko Resource Area offers a variety of recreation opportunities and is used increasingly for recreation by both local communities and nonlocal sources. The nearest metropolitan areas of Salt Lake City, Reno and Las Vegas are expected to continue their population growth, creating the potential of greater recreational demands within the resource area. With a higher level of use comes the potential for impairment of other resource values.

Planning Question

What areas will be open to off-road vehicle use?

Planning Criteria

1. Identify areas of public land that will be designated as open, limited or closed to off-road vehicles.

2. Off-road vehicle designations will consider protection of resource values such as crucial wildlife habitat, riparian areas, cultural or historical sites, watershed stability, potential wilderness areas, areas of conflicting uses, areas of critical environmental concern, visual quality and other values and uses.
3. Restrictions will be the least necessary to satisfy identified concerns. Restricted or closed vehicle areas will be identified on public maps or by site specific signs.

Planning Question

Other than extensive recreation use areas, how will recreation areas be designated and managed?

Planning Criteria

1. Recreation areas will be designated as Developed Special Recreation Management Areas (SRMAs) Enhanced SRMAs, or developed recreation sites.
2. The intensity of management actions for each designation will vary. Management of a designated recreation area will be based on the parameters of carrying capacity, Recreation Opportunity Spectrum classes, resource protection and user safety. Management goals will be to provide quality wildland recreation experiences suitable to the resources and complimentary to other programs and agencies.

Issue No. 5: Wilderness

Section 603 of FLPMA directs the Secretary of the Interior to review roadless areas of 5,000 acres or more identified as having wilderness characteristics, and to report to the President on their suitability or nonsuitability for wilderness designation. The Secretary is also directed to cause mineral surveys to be conducted by the U.S. Geological Survey and the Bureau of Mines to determine the mineral values, if any, in suitable areas. The Secretary is further directed to manage lands under review, in a manner that will not impair their suitability for wilderness designation, as set forth in BLM's Interim Management Policy.

Planning Question

Which wilderness study areas (WSAs) or portions of WSAs will be recommended as suitable, and which will be recommended as unsuitable for designation as part of the National Wilderness Preservation System?

Planning Criteria

BLM recommendations in this RMP on suitability or nonsuitability of wilderness study areas for wilderness preservation will be based upon:

1. Evaluation of wilderness values
 - a. **Mandatory wilderness characteristics:** The quality of the area's wilderness characteristics, e.g. 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, e.g. 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 expanding 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: Recommendation as to an area's suitability or nonsuitability for wilderness designation will reflect a thorough 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 or unsuitable 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 wilderness study area's multiple resource and social and economic values and uses.

- e. Local Social and Economic Effect: In determining whether an area is suitable or unsuitable for wilderness designation, the BLM will give special attention to adverse or favorable social and economic effects, as identified through the wilderness study process, which designation of the area would have on local areas.
- f. Consistency with Other Plans: In determining whether an area is suitable or unsuitable 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 the BLM planning regulations.

Issue No. 6: Livestock

As a result of a 1973 Federal court suit, the BLM has been directed to prepare an environmental impact statement (EIS) to analyze the potential impacts of alternative grazing programs. This EIS requirement is integrated into the Resource Management Planning process.

Planning Question

What will be initial stocking levels, kind of livestock and season-of-use for each allotment?

Planning Criteria

Mapped vegetation and utilization patterns, ecological condition, soil survey and range site correlation for each allotment will be compared to the total and active grazing preference for livestock, the past average actual livestock use as submitted by the livestock operator, and the forage demand for wild horses and wildlife. This information, along with additional range monitoring studies (actual use, utilization, condition class, trend and climatic information) and consultation with livestock permittees and other interested parties will be used to establish (1.) a proposed initial stocking level, (2.) kind of livestock, and (3.) season-of-use designed to improve each allotment to good condition or better.

When the existing demand for forage exceeds the current forage production, livestock, wild horse, and wildlife numbers will be balanced to meet available forage needs.

Planning Question

Which allotments have the potential to produce additional livestock forage and which require allotment management planning?

Planning Criteria

1. Soil survey and range site information, range monitoring studies and site specific observations by BLM personnel and permittees will be used to identify those areas having potential for development of additional livestock forage.

2. Other inventories and site specific information will identify critical resource values such as crucial wildlife habitat, cultural sites, erosive soils, wilderness study areas, and high quality scenery. Land treatments will be emphasized if they do not conflict with valuable non-livestock resource values. Grazing management will be designed to enhance these values along with the vegetation and soil resources.
3. Allotments will be categorized based on the selective management approach which identifies allotments sharing similar resource characteristics, management needs and economic potential for improvement. Similar allotments will be identified as belonging to one of three categories, for which the objective is to: Maintain their current satisfactory condition (M); Improve their current unsatisfactory condition (I); or manage the allotments Custodially, while still protecting existing resource values (C).
 - a. Allotments in the Improve category will be given first priority for development of allotment management plans or activity plans to resolve specific identified problems. Second priority for allotment management plan development will be given to Maintain category allotments; third priority will be assigned to Custodial category allotments.
 - b. Allotments have been categorized (M, I, or C) as a result of consultation between Elko Resource Area range conservationists and livestock permittees. All permittees have had the opportunity to provide input. The Elko District Grazing Advisory Board, Coordinated Resource Management and Planning Committee, Nevada Department of Wildlife and other interested parties will also have the opportunity to provide their recommendations.

Issue No. 7: Wildlife Habitat

Terrestrial

In compliance with the principles of multiple use, the BLM is charged with the protection and enhancement of wildlife habitat. Competition for habitat components (forage, water and cover) exists between wildlife and other resource uses, e.g. mining, livestock, recreation, in some portions of the Elko Resource Area.

Planning Question

What will be the number of mule deer, elk, and antelope to be maintained in each grazing allotment?

Planning Criteria

Identify present and future levels of big game to be maintained within each allotment.

Planning Question

Where are the areas of crucial wildlife habitat and how will these be managed to maintain and enhance big game, upland game and non-game populations?

Planning Criteria

1. Identify crucial seasonal and crucial year round habitat for wildlife species. Priority areas include:
 - wintering areas
 - nesting and brood rearing areas
 - fawning areas
 - strutting grounds
 - riparian habitat
2. Identify areas needing management to provide for the protection or development of food, water and cover which will allow for optimum wildlife populations.

Riparian

Aquatic, and riparian habitats constitute less than one percent of the total land area administered within the Elko Resource Area. However, they are the most productive in terms of plant and wildlife diversity. They are also areas where competition exists between various resources, including wildlife, mining, livestock and recreation. As required by Executive Orders 11988 and 11990, management actions within floodplains and wetlands are to include measures to preserve, protect and, if necessary, restore their natural condition.

Planning Question

How will riparian resources be managed to maintain those areas in good or excellent condition or enhance those in poor to fair condition?

Planning Criteria

Aquatic/riparian habitat in poor or fair condition will be managed in a manner that will improve habitat to good condition. Habitat in good or excellent condition will be managed to maintain that condition. Protective measures will occur on a priority basis as funding permits. The following criteria will be used to prioritize the order for protection:

- areas providing habitat for threatened, endangered or sensitive species.
- areas containing crucial wildlife or fisheries habitat.
- waters presently containing productive fisheries.

- waters where the maintenance of water quality is essential.
- areas having the potential of becoming crucial wildlife habitat as the result of reintroduction of a wildlife species or the potential of becoming a productive fishery with the restoration of degraded habitat.

Planning Issue No. 8: Wild Horses

Wild horse management is governed by the Wild and Free Roaming Horse and Burro Act of December 15, 1971. 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.

Planning Question

What areas will be designated as herd management units?

Planning Criteria

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

Planning Question

How many wild horses will be maintained within designated herd units?

Planning Criteria

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

Issue No. 9: Watershed

Critical watersheds are areas which are deemed critical because they are (1) presently used or are being considered for use as a supply of water to municipalities, (2) currently or could potentially support fisheries, and (3) are used as high recreation use areas or are within unique and natural settings, such as, wilderness study areas. Significant concerns associated with critical watershed uses are to provide a sustained source of clean water for municipalities and fisheries and promote stable watersheds in recreation areas and areas of unique and natural features.

Planning Question

Where are the critical watersheds and how can they be managed to promote watershed stability?

Planning Criteria

1. Identify critical watershed areas that either are currently or are being considered for supplying water to municipalities.

2. Identified erosion problems will be controlled by appropriate actions such as use restrictions, seasonal closures, rangeland watershed seedings, and drainage control structures.
3. Soil survey will be used to identify those soils having restrictions for land uses such as livestock grazing (in combination with monitoring data), road building, off-road vehicles, vegetative conversions, etc.

Issue No. 10: Forestry

Increasing public demand has made it necessary to develop a management program that will maintain or improve the supply of forest products i.e. firewood, posts, pinenuts and Christmas trees, for private and commercial uses. Portions of the Elko Resource Area need to be identified as suitable for the harvest of forest products.

Planning Question

What is the production capability of forest lands and how will the demands for forest products, in relation to this production, be met?

Planning Criteria

1. Identify a yearly harvest level that will maintain or improve the sustained yield capability of the land.
2. Designate harvest areas that will achieve management goals for sustained yield and multiple use resource values while reaching or attempting to reach the demand for wood products.

Planning Question

What portion of the yearly harvest will be available for commercial versus private uses?

Planning Criteria

Determine what portion of the allowable cut will be identified for commercial versus private uses.

Issue No. 11: Minerals

Development of locatable (hard rock) and leasable (oil and gas and geothermal) minerals is necessary to meet National, regional and local demand and to provide increased employment and an expanded tax base for local communities. The Federal Mining and Mineral Policy Act of 1970 declared that it is the policy of the Federal government to foster and encourage the development of mining. However, in some areas mineral exploration, development and associated road construction are conflicting with other resource values.

Planning Question

What areas will be open to leasable mineral development?

Planning Criteria

1. Identify areas that are open to mineral leasing with no special protection required.
2. Identify areas needing special protection, but otherwise open to mineral leasing.
3. Identify areas which should be closed to mineral leasing in order to protect special or unique values or uses that are incompatible with mineral development.

Planning Question

What areas will be open to locatable mineral development?

Planning Criteria

1. Identify areas that are open to locatable mineral development with no special protection required.
2. Identify areas needing special protection, but otherwise open to locatable mineral development.
3. Identify areas which should be closed to locatable mineral development in order to protect special or unique values or uses that are incompatible with mineral development.