

BOB MILLER  
Governor

STATE OF NEVADA

✓ m 10/25/93  
CATHERINE BARCOMB  
Executive Director



**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

50 Freeport Boulevard, No. 2  
Sparks, Nevada 89431  
(702) 359-8768

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Reno, Nevada

October 25, 1993

Bill Baker, Manager  
BLM-Elko District Office  
3900 E. Idaho Street  
Box 831  
Elko, Nevada 89801

Dear Mr. Baker,

We received your letter containing the EA for the Spruce Interim AMP prepared by RCI. We also noted your decision to rescind authorization of the Spruce Interim AMP pending "until such time as the appeals are resolved," and to follow regulations and policy in preparation of the Interim AMP.

Since that time you have called us requesting that we withdraw our appeals, especially since you have also informed us that the appeal was never filed with IBLA. After discussion, we are unable to comply with your request as we have serious concerns we would like to see resolved. We have sent you our comments on the EA for the AMP and expressed our concerns to you on that as well.

We feel that at this time we cannot withdraw our appeal since we do not wish the agreement and interim AMP authorized as stated in your letter of August 23, 1993. Therefore, we formally request that you file our appeal with IBLA immediately.

If you have any questions, please feel free to contact us.

Sincerely,

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

CATHERINE BARCOMB  
Executive Director

# W H O A

WILD HORSE ORGANIZED ASSISTANCE  
P.O. BOX 555  
RENO, NEVADA 89504



a note from

Dawn Y. Lappin

October 25, 1993

Bill Baker, Manager  
BLM-Elko District Office  
3900 E. Idaho Street  
Box 831  
Elko, Nevada 89801

Dear Mr. Baker,

We received your letter containing the EA for the Spruce Interim AMP prepared by RCI. We also noted your decision to rescind authorization of the Spruce Interim AMP pending "until such time as the appeals are resolved," and to follow regulations and policy in preparation of the Interim AMP.

Since that time you have called us requesting that we withdraw our appeals, especially since you have also informed us that the appeal was never filed with IBLA. After discussion, we are unable to comply with your request as we have serious concerns we would like to see resolved. We have sent you our comments on the EA for the AMP and expressed our concerns to you on that as well.

We feel that at this time we cannot withdraw our appeal since we do not wish the agreement and interim AMP authorized as stated in your letter of August 23, 1993. Therefore, we formally request that you file our appeal with IBLA immediately.

If you have any questions, please feel free to contact us.

Sincerely,

DAWN Y. LAPPIN  
Director

10/15/93 Cathy  
FOI  
Rose

Toiyabe Chapter of the Sierra Club PO Box 8096 Reno, NV 89507

Oct. 15, 1993

Bill Baker, Manager  
BLM/Wells RA  
PO Box 831  
Elko, NV 89801

VIA FAX  
and Mail

Dear Manager Baker,

Thank you for rescinding authorization of the interim AMP and Spruce and Valley Mountain Rangeline Agreement until such time as the four appeals are resolved and for sending us a copy of the environmental assessment on the Spruce Interim AMP for our review and comments. You subsequently asked that the Sierra Club and NRDC withdraw our appeals so that the BLM can go through the CCC process.

Unfortunately, we are unable to comply with your request, as we have serious concerns with both the Rangeline Agreement and the interim AMP which we would like to see resolved. These include an excessively high and unjustified cattle to sheep conversion ratio, lack of actual use information since 1986, lack of monitoring data on condition and trend, no provisions to prevent future degradation of riparian areas nor to restore and rehabilitate existing degraded riparian areas, and a totally unrealistic level of "range improvements" designed to increase livestock forage production and availability with no concomitant commitment to improving grazing management - thus simply spreading livestock overgrazing around. We definitely do not wish the agreement and interim AMP authorized if we withdraw our appeals, as stated in your letter of August 23, 1993.

Likewise, we have serious concerns with the draft EA which should be addressed. These include the lack of specific information on actual use, condition and trend of vegetation, and monitoring; the lack of a range of reasonable alternatives; the lack of any substantive analysis of the environmental impacts of the proposed action; the inclusion of exorbitant levels of economically and environmentally unsound range improvements; the lack of any substantive provisions to protect riparian areas or to

restore and rehabilitate degraded riparian areas.

For these reasons, we are unable to withdraw our appeals at this time. We request an opportunity for direct consultation with you and your staff on the concerns and questions we have about these documents before we are able to decide on withdrawing our appeals.

Thank you for your attention to this matter.

Sincerely,

/s/

Rose Strickland  
Sierra Club

/s/

Johanna Wald  
NRDC

52% COTTON FIBER 92A  
TYPE-EBVSE