PROPOSED WELLS RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

UNITED STATES

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

Elko District Office

Elko, Nevada

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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

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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

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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.

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 downcutting 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 ADUs from the present 3 to 5 year average use level of 288,934 ADUs. 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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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, BLM 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 BLM 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

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 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 seedlings/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-Q-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 OKV 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 unsuitable for wilderness designation.

<u>WSA</u>	<u>Suitable Acres</u>	<u>Unsuitable 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 unsuitable 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 pine-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 BLM 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 BLM 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/	13	Chase Springs
Goshutes	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

within the Bluebell 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 NDOI 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.

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
REVISONS TO TABLE 2-2									
LANE:						69,095 acres, including 360 acres for community expansion of Montello			90,000 Acres
ACCESS:	BIM Road # 1132		BIM Road #1070, 1074						14 Roads
	6 Miles		9 Miles	25 Miles					87 Miles
LIVESTOCK GRAZING:									
Seed Acres					6000			6500	
NA = Not Applicable									

REVISES TO TABLE 2-3				
ACCESS:	BLM Road #1132	Add BLM Road #1070, 1074	Delete "6 extension at Twin Meadows Ranch" and insert 1222	38 Roads
	6 Miles	14 Miles	34 Miles	158 Miles
RECREATION:			Delete	Manage 3 recreation areas
NA = Not Applicable				

REVISIONS TO TABLE 2-4			
ACQUISITION:			Delete "5 extension at Twin Meadows Ranch" and insert 1222
NA = Not Applicable			
REVISIONS TO TABLE 2-5			
LANDS:			69,095 acres, including 360 acres for community expansion of Montello
			90,000 Acres
ACCESS:	BLM Road #1132	Add BLM Road #1070, 1074	Delete "5 extension at Twin Meadows Ranch" and insert 1222
	6 Miles	14 Miles	38 Roads
RECREATION:			Delete Action
			158 Miles
			Manage 4 recreation areas
NA = Not Applicable			

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 4-11

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					9 Roads (SA)
		6	9	5					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)

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	38 Roads (SB)
		6	14	34	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
Mld-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

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

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

DESIGNATED CORRIDORS

- 3 mile width
- 3 mile width - low visibility

PLANNING CORRIDORS

- 5 mile width

PREFERRED AND MIDRANGE ALTERNATIVES

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

SECTIONALIZED
TOWNSHIP

8	5	4	5	2	1
7	6	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

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

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

1983

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

TABLE 4-1

INDEX OF RESPONSE NUMBERS TO COMMENTS, BY ISSUE

COMMENTS		Lands	Corridors	Access	Recreation	Wilderness	Grazing	Wild Horses	Wildlife Habitat	Aquatic/ Riparian	Woodland Products	Other
Written												
1.	Celsius Energy Co.											
2.	Desert Fishes Council											
3.	Reed Secord											
4.	Jeffrey Crook											
5.	Don Smith*						1					
6.	Harry Melts (1st letter)					64,65,66, 67						
7.	Wendover form letter**											2
8.	Bob Wright* (1st letter)				4		5		3			
9.	Robert E. Wright, Jr.*						5, 7	6	8			9
10.	Atlantic Richfield Co.					68						10
11.	Bureau of Reclamation											11, 2
12.	Mary Ann Dotson											
13.	Wildlife Management Institute						12, 13		12, 13			
14.	Blair G. Johns (1st letter)						5	14				
15.	Roy Young								3			
16.	Nevada Grazing Board of District #1	2,33	33	33	17,33	2,33,69, 70,71	2,5,7,15, 16,18,19, 20,21,22, 23,24,25, 26,27,33 5	6,30, 33	3,8,31, 33	28,29,32 33	33	
17.	Ken Jones											
18.	Bob Wright* (2nd letter)											
19.	The Wildlife Society				34				3			
20.	U.S. Fish & Wildlife Service	86			2		36			37,38		
21.	Leonard N. Wines											
22.	Von L. Sorenson*											
23.	Blair G. Johns (2nd letter)											
24.	Carol M. Johns											
25.	Eloise McQueary						5,18					
26.	Robert Hawks											
27.	Bert N. Smith						39					
28.	Paul W. Smith						39					
29.	Nevada State Clearinghouse											
	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, 18,33,39, 59		2 3			2
53.	Nevada Department of Agriculture	33	33			33		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 76						60
60.	Dave Hornbeck											
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

RESPONSES TO WRITTEN AND ORAL COMMENTS

<u>Response Number</u>	<u>Response</u>
1	<p>The later livestock turnout date of July 1 is only one of the several methods of achieving proper grazing management identified on page 2-29 of the DEIS. These treatments will be used only where appropriate for the management of a specific vegetative type, allotment, or pasture.</p> <p>Concern for the economic impact is appropriate and the values are significant. These economic effects will be taken into consideration in the decision process.</p>
2	See Chapter 3, Revisions and Errata, of this FEIS.
3	In response to these comments both reasonable and existing numbers for wildlife have been double checked and revised where necessary through a cooperative effort of both the Bureau and the Nevada Department of Wildlife. Table A-2, beginning on page A-6 of this FEIS, displays this revised information. Even though it is anticipated that these revised reasonable numbers will be considered high by some individuals and/or groups, the season of use and duration which wildlife occupy any given area are the important factors.
4	The vast majority of ORV use in the Wells RA is occurring on the numerous existing roads scattered throughout the area. While some occasional ORV use does take place off existing roads, this minimal use has posed no serious threats to various resources (archaeological sites, wildlife habitat, soils) which would warrant "limiting" or "closing" an area to motor vehicles. ORV use was addressed within the recreation issue in the DEIS.
5	<p>Since range survey data will not be used to set initial stocking rates, the three to five year annual licensed AUM use figure was used for analysis purposes in the DEIS. It represents neither an increase nor a decrease in actual livestock use but the present level of grazing use.</p> <p>In reference to the lack of information on suspended non-use AUMs, an allotment may eventually have more or less AUMs than its "total preference" (active and suspended AUMs). Stocking rate will be determined by the carrying capacity of the range as indicated by rangeland monitoring, not whether it has suspended AUMs.</p>
6	The 1971 level of wild horse numbers have never been determined because of the lack of verified counts. However, since all counts prior to 1978 included claimed and private horses, the number would be significantly greater than 320.
7	<p>In regard to maintenance of range improvement projects, BLM policy from Washington Office Instruction Memorandum No. 83-27 entitled "Final Rangeland Improvement Policy" states that:</p> <p>1. Parties deriving the primary benefit(s) from a structural improvement shall be responsible for maintaining that improvement. Primary benefits constitute more than 50 percent of the benefits realized. When no party derives more than 50 percent of the benefits from an improvement, or when use of an improvement is required at a time when the primary beneficiary would not ordinarily use the improvement, maintenance responsibility will be negotiated on a proportionate share basis.</p>

TABLE 4-2 (Continued)

Response Number	Response
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 Federal Register 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-Pequot 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-Pequot 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)

Response Number	Response
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)

Response Number	Response
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 1980 National Survey of Fishing, Hunting, and Wildlife Associated Recreation, Nevada Supplement, 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 ALMs 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 defoliation 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="173 1144 992 1231">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="173 1253 992 1297">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.	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.
	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.
37	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.
	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.
38	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.
39	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.
40	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.
41	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.

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 Oeratoideis 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)

Response
Number

Response

- 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 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.
- 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.
- 48 The impact analyses in the RMP for wilderness was guided by the BLM Wilderness Management Policy and the Wilderness Study Policy. The Wilderness Study Policy, 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."
- 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-QG-PP outside the boundary of the WSA.

TABLE 4-2 (Continued)

Response Number	Response
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	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.
	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.
	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.
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)

<u>Response Number</u>	<u>Response</u>
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 NDOW 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.	<p>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."</p> <p>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.</p>
62	<p>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.</p>
63	<p>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.</p> <p>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.</p> <p>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.</p>
64	<p>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.</p>

TABLE 4-2 (Continued)

<u>Response Number</u>	<u>Response</u>
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 unsuitable.
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 BLM is an acceptable practice in delineating 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)

Response Number	Response
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 unsuitable 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 1008 • SALT LAKE CITY, UTAH 84147 • PHONE (801) 536-0000

May 23, 1983

Mr. Rodney Harris
Elko District Manager
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 exploration firm with leases in the Spruce/Goshute Resource Conflict Area. We strongly recommend that the Bureau of Land Management use the Resource Management Alternative for the Classification of the Spruce/Goshute Resource Conflict Area. We believe this alternative is the most logical and 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

G. G. Francis
Western Division
Exploration Manager

GGF:jh

cc: Mr. Roland Gili
Mr. Bob Pittam

Comment Letter 2

Desert Fishes Council

Dedicated to the Preservation of the
Desert Fishes of the
Bishop, California 9534
May 26, 1983

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

Re: 1792 (NW-010)

Dear Mr. Harris:

This refers to your recent communication relating to the 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. This would move livestock grazing off the riparian/riparian habitat while reducing livestock impacts. Although the Preferred Alternative is 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/riparian habitat might be improved), and allowing for a 2% increase in livestock grazing, which in the primary cause of riparian/riparian habitat damage.

Again, we urge adoption of the Resource Protection Alternative.

Sincerely,

E. P. Pfister
Executive Secretary

Mr. Barney Harris
District Manager
Bureau of Land Management
2002 22nd Street
Las Vegas, Nevada 89101
Dear Mr. Harris:

Please include this letter in the cc. only on BLM's Resource Management Plan and Environmental Impact Statement. I support the Resource Management Plan and Environmental Impact Statement. It is important that we have the BLM's resources be used for wildlife, lands, recreation, and primitive values. I lived in Nevada for twenty years.

Sincerely,
Charles S. Scahill
Box 3-300

Rodney Harris
District Manager
(P.O. 834) 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, backpacker, and conservationist, deeply concerned with the management of our federal lands.

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

- (1) I question the need for intensive management of shrub tree cutting on all 700,000 acres of woodland. The objective in Resource Protection is to protect the riparian habitat plan should follow the Resource Protection Act for 524 miles of stream habitat improvement. I find this one of the most common and worst problems on all BLM districts in the W. I feel because of the tremendous value of scarce riparian habitat to fisheries, water shed, wildlife habitat, and commodity use it must have top priority.
- (2) I don't like the language "essential and unique habitat" where only "essential and critical" wildlife habitat will be protected.

be adjustment of live stock usage. I realize
 full well that grazing has always received
 top priority on BLM range, but it
 should not to the exclusion of AUMS
 and range for all but curable areas
 in wild life. In example, if domestic sheep
 have to be relocated in Opshute or
 Pilot areas for protection of bighorn rein-
 deers, that should be done.

(4) I question the need for an increase in
 domestic grazing on any BLM district
 I have seen. Further the prebuck plan
 to construct all the "improvements" including
 80 miles (1) of pipeline seems suspicious
 on a cost/benefit basis. It would appear
 we taxpayers will bite the bullet on
 that. I would appreciate more data on
 these proposed actions, especially as they
 may impact WSA's, ACEC, etc.

With regard to the recommended
 wilderness alternative, I generally support
 your position. The average in each area
 recommended is significantly justified by
 the data. My question is how much
 more wilderness area could have only
 these 4 areas designated as WSA's?

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

Of special importance to me are the protection
 of the area & conditions in the Opshute &
 Bluebell WSA that protect the bighorn
 reaper 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
 WSA's are recommended to by the State
 Director.

Sincerely,

Jeffrey Cook

27041 SE Holly Rd
 Boise ID 83709

Comment Letter 6

The increased costs of the operation are more than made up for by the fact that the tunnel would completely close off any light at the end of the tunnel for any catfish in the tunnel.

6-21-23

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 regard to environmental damage, have witnessed the issuance of permits to dig down the Grand Canyon, and to dump 6000 tons of perlite in Ely District near Wheeler Peak. Frequently litter, traps, outcrops and branches are left after departure. People getting study permits should required to issue a bond to cover the cost of rehabilitation if they are not required. More so in WSA's. Management policies are their enforcement.

July 10, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
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.

In reviewing this document, an area of concern has surfaced. In section 3 page 17 (3-17) the 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 the only way to purchase private land on the market for individuals is through a company. 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. I am not the feeling of a large majority of the people in West Wendover.

MRL Harris-

In agree with this letter and would
Appreciate your opinions.

Brend Jones
Box 2422
Wendover, Nevada 89083

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

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 conditions of the lands managed by the Bureau. Actual field range numbers 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., this is only telling them what 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 range available.

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 Wildlife numbers are allowed to increase at that rate then livestock numbers should also be increased.

3rd Wright

The modification of fences to accommodate wildlife would be an expensive undertaking and not cost effective. In areas where wildlife frequently grazes such as meadows and irrigated pastures, seldom does one get hung up in a fence. If the 420 miles of fence is modified the wildlife department should make arrangements to stand the cost of the project.

I did not touch reference in the plan to the change being done by four wheel drive vehicles used by hunters and recreationalists. In some areas just about every ridge is getting a road started and with the increased motorize the past year erosion is taking place on these roads. In last one road I have seen this spring has washed to a depth of ten to twelve feet. This should be addressed in the plan.

In regard to livestock grazing in the Wild Resource area, I find very little mention of the suspended now-use A.U.M.'s and their relationship to the active use. All comparisons in the management actions are made on a 5 to 8 year use. The preferred alternative shows a 22% increase in A.U.M.'s when actually it is a 25 1/2% decrease when compared to the active preference. The only alternative that shows any increase in livestock grazing is the Resource Rehabilitation one, that being about 22%.

The improvements proposed in the preferred alternative for livestock grazing is not adequate. Only 22,000 acres are identified as rangeland whereas the Resource Rehabilitation alternative 220,000 acres. Once water wells should be drilled and springs developed along with phosphorus to obtain better distribution of livestock and wildlife use. Much research has been done on prescribed burning and spraying. Only 41,500 acres are being proposed. Economics will be such that burning will have to be used more. Seeding within the dunes and sprays should be considered being

native species as well as the wheat grasses. Seeding would also help reduce the increase of rabbit brush in the trashed 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 goal 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 Ignace-Gashuata seem to be more than adequate for that type of wilderness. Can wilderness area could just as well suffice and adequately provide for that demand.

After the four last year of the riparian stream habitat in the Olmit 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 90 miles up 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 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 viewing posts, the blooming shrubs and the excellent condition of wildlife and livestock in the Wild 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 and it would surely be more acceptable than any of the alternatives proposed in the plan.

Comment Letter 9

ROBERT E. WRIGHT, JR.

702752-3458 • CLOVER VALLEY
WELLS, NEVADA 89835

June 21, 1983

Mr. Ed Spang
State Director
Nevada State Office
Bureau of Land Management
Federal Building
300 South Street
Heno, 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 4 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 handle, 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 than you have outlined. The Bureau has 289,034, when actually there are 379,279

Comment Letter 9

(2)

A.U.M.s.

The Bureau in these 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 emphasis on school book data and little or incorrect information on actual use or trend.

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 "unknown". 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 figure 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.

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 use of the Bureau.

I would like to comment on the procedures the Bureau will go in accordance with as specified in the Western State Sage Grouse Guidelines. Any alteration of sagebrush areas, or any created whoatease seedlings will not be located in crucial big game habitat or eagle grouse areas. Studies have just been completed on the Savel Ranch north of Elko, in which the numbers of eagle grouse increased

(3)

8 because the sagebrush was removed and created 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, barbed-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 existent. What does the presence of these tracks do to the access of public lands and do they create management problems to the users.

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 recognize about 1 hand full. Of the references given, 1 allusion 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 values 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

Robert E. Wright

Atlantic Richfield Company 555 Savantheen 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 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 RMP should properly 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 resource management concerns, including such items as recreation, wildlife, timber, 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 a substantial property interest in a portion of the Wells Resource Area, and the BLM has jurisdiction in our estimation harbors high potential for the development of oil and gas. Our evaluation of the preferred alternative's recommendations for this area is based on the fact that the RMP contains no 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 Railway.

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

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Comment Letter 10

Comment Letter 10

Mr. Rodney Harris
July 26, 1983
Page 2

reports contain useful information on the development potential of specific areas. With respect to the Wells Resource Area, we agree with the G-E-M report's recommendation for the South Requep area that detailed mapping of phosphate occurrences be completed to determine how significant these occurrences are, and that 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 recommendation that detailed mapping 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 the G-E-M's recommendations. We encourage the BLM to re-evaluate its preliminary recommendations for wilderness suitability using the additional information now available in the G-E-M report. We believe the wilderness acreage 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 that is designated as a wilderness area, 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 report. We believe that the BLM should be able to fulfill its multiple use mandates for public land management.

68

Mr. Rodney Harris
July 26, 1983
Page 3

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

Sincerely,

Joy R. Mitchell

J. R. Mitchell
JRM:JFO:dsm

United States Department of the Interior
BUREAU OF RECLAMATION

WATER-CONSERVATION-RECLAMATION-DIVISION
BUREAU OF RECLAMATION
1400 G STREET, N.W.
WASHINGTON, D.C. 20004

DATE: MP-150

JUL 28 1983

To: District Manager, Elko District, Bureau of Land Management, Elko, NV, Attention: RSM, EIS Team Leader
From: 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 groundwater availability and an arid area such as that covered by the DEIS. Impacts to surface and ground-water availability, resulting from the proposed project, should be discussed. Groundwater users must be assured that the quantity and quality of their water will be protected.

Specific

1. Summary, Alternatives, page 5-1 - The introductory paragraph states "each [alternative] emphasizes a different balance between conflicting resources." In view of the fact that the project is a water project, the word "each" alternative emphasizes different water resources.
2. Preferred Alternative, Issue 6-23, page 2-23 - The development of the project in the Resource Area is discussed. The location of the water project and 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 "critical and/or strategic minerals," some designated as "critical and/or strategic minerals," some designated as "critical and/or strategic minerals." Barite, mentioned in the list, is a critical mineral mined in the area, is shown on the list.

4. Environmental Consequences, page 4-2 - As mentioned previously, the preferred alternative is 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. Environmental impacts will have to be identified and analyzed.

Under the discussion of an irreversible commitment of resources for the preferred alternative, page 4-2, the amount of water lost to evaporation and the effects of this loss on downstream water users, should also be discussed.

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.

Paul R. [Signature]

I have read a lot of comment & one time or another
 we have had criticism about the article, even saying
 it's only religious propaganda. I don't find
 it so much so on the whole, since the words used of
 it are. There have been exciting people for land
 in the America and the much longer must I
 be able to get a spot for myself? All that land
 in the - unexcited, useless - Saginaw and
 it's so many many people in America want
 it, they expect for a plot of ground to work their
 own land. It's over so much that we over
 it is a lot harder to collect the taxes, who else
 can the little guy? He one who pays the highest
 sort of tax of taxes in the country & has money
 over? You bet I do! He not get rich. Change
 for their story, the same is your business -
 without financial I just don't have 3000 for 4000
 in 1/2 an hour! I would be working as hard for the
 land. In fact they aren't selling any got. We're they
 not? Our employees at the whole way, even
 how difficultly, getting things together for in
 the house. He large company how housing for them
 employees only. What they put they have to move &
 find housing elsewhere that time they can't in the
 town. We don't. The city really all got land
 to expand it, not to expand? Who decides, who gets
 the land? The no person with all the money & the

... it would be a lot of money to have
 in it's name - Do we have anything to say
 about it? I don't want you come out to understand
 talk to the people who live and vote here. Why don't
 you have our side of it & let's represent ~~the~~ ^{us}
 (Why are we here?)

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

August 2, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management

Post Office Box 831
Elko, Nevada 89801

W. Mr. Harkin:

The Wildlife Management Institute is pleased to comment on DRAFT WELLS REBRESOURCE 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 AIM by \$,312 (1.7 percent) over the three to five year average licensed use at a cost of \$2,381.00 (Page 2-23). This calculates to a cost of \$7.48 per AIM 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 (\$9,381,500) 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 work listed at cost.

Livestock		Wildlife	
Improvements		Improvements	
Seed	35,500 acres	Chain or burn	5,500 acres
Burn	27,000 acres		
Spray	1,500 acres	Modify Fence	650 miles
Fence	265 miles		
Grass	600 acres	Protect and	
Neenwaite	30	Enhance Springs	250
Pipeline	80 miles		
	\$2,381,500		\$1,509,000
Total			

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 sets 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,

David W. Reed

Daniel A. Poole
President

DAP:1bb

K C Ranch
Clover Valley
Hells, Nevada
August 16, 1973

Mr. Rodney Harris
Bureau of Land Management
P.O. Box 931
Elko, Nevada 89601
Dear Mr. Harris:

I am delighted with great interest your Draft of the Wells
and Tobar allotment Plan and Environmental Impact Statement.
I attended your June 21, 1973 public hearing.

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

Under your Preferred Alternative Plan:

Issue 6: Livestock grazing.

You propose a cut of 33% of grazing A.U.M.'s below preference.
You propose to cut my A. U. M. preference on my Chase Spring
and Tobar allotment by 63.4%. That proposal is just not fair.

I am a relatively new landowner 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
away 33% of my A.U.M.'s you are forcing me to cancel 63.4% of my preference A.U.M.'s.

You will notice in my files at your office many letters re-
questing cooperative participation in new range seeding, fencing and
water development. I have been very cooperative and I am sure that
my desires will be a severe economic blow to me. If severely undermined 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.

There were no wild horses on my Tobar and Chase Springs
allotments until the passage of the Act in December, 1971.
Glen Anderson, my B.L.M. "wild horse" manager, told me
my files on those allotments. You will notice that you have letters
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 4: Wild Life.

You have placed too much emphasis on increasing wild life
and decreasing livestock grazing. It would be better to emphasize
cooperation and management of the range. I am a rancher. Don't
forget the threat of that private landowner who is not getting
wild 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 63.4%.

Summary: For Chase Springs and Tobar Allotments.

1. We should increase production as per my requests over the last
12 years. I have been very cooperative in my grazing. I am not
asking for more. There is enough land suitable for reseedling to produce feed for
10,000 A.U.M.'s plus wild life feed.

2. Your proposed 63.4% reduction in my grazing preference would
place me in a severe economic straits. I have been very cooperative
in my ranching business. Private may 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-Peque Hard use Area shows
approximately the following land in my Chase Springs Allotment:

T. 33 N., R. 43 E., Section 13, all. Section 16, S&4
Section 24, all. Section 23. E4. Section 25, N&4.

T. 33 N., R. 43 E., Section 16, all. Section 17, S&4
Section 19, all. Section 20, S&4. Section 30, N&4,
Section 29, N&4.

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 management plan all of those sections which use the
Federal land.

Sincerely yours,

K C Ranch
Clover Valley
Hells, Nevada 89655

K C Ranch

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, Nevada Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

It has come to our attention that a severe discrepancy exists between the wildlife numbers contained in the draft Wells Resource Area Management Plan and the actual wildlife numbers. According to information given to our consultant by NDOI personnel, the numbers provided by NDOI were intended to reflect their best estimate of reasonable numbers for big-game animals.

An analysis of NDOI'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 50,000. This estimate was based on the assumption that there were large blocks of private land and other BLM Resource Area as well as lands within the EIS area.

NDOI'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 75,000 as the reasonable number for deer, and shows the discrepancy between the NDOI estimate and the EIS estimate exists with the antelope numbers.

If you will look closely at the above numbers, I am sure you will agree that the discrepancy between the NDOI estimate and the EIS estimate should be made in the analysis of impacts of the various alternatives.

Very truly yours,

Roy Young
Roy Young, Chairman

RY/sa

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

WILSON RESERVATION, GRAND UP DISTRICT, N-1
COMMENTS ON WELLS RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT
by Lester A. McKenzie

GENERAL COMMENTS:

Page 2-1, Resource Conflict Areas:
Dividing the area into units with similar problems probably expedited the preparation of the RMP. The choice of the word 'Conflict' was unfortunate, however, because it indicates the authors had preconceived conclusions about the distribution of 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' projects proposed in this document are for category '1' allotments.

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According to this, only 25 of the 67 allotments would have any improvement work done. Many 'c' and 'M' allotments have serious livestock distribution problems that can be solved only by installing water developments and fencing. Are these allotments ignored until management plans have been implemented on all of the '1' allotments?

Page 2-3, 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 the checkerboard pattern. Surely this is not what was intended!

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

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Page 2-7, No-action alternative:
This alternative is not realistic. Continuation of the present uses and levels of development is not in line with law and with Washington and State office directives. Actual activities would be considerably different from the picture painted by the description of the No-Action alternative contained in this

11 15017HS Bldg Comments on Wells R.A. RMP/EIS Page 2

document. Several examples are listed below.

1. Modern study requirements would still be in effect, and the need for modification of at least one of the study areas would be recommended.

2. Improvements would be made for improvements and these would be covered by plans and EIR documents.

3. The livestock 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 indicated 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 RMP'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 reduce the resource contribution to the commercial well-being of the Resource Area...."

The management actions described for the alternative seem to be near the maximum practicable for lands, corridors, woodland and riparian areas. The alternative is not a true no-action alternative. It is quite conservative in most instances. For example, the PROTECTION alternative has more spring developments, more ponds and more brush burning than the PRODUCTION alternative.

Other uses 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 or would address those commercial activities that contribute to the local economy. Omitting actions

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designed to enhance the recreational benefits of fisheries and wildlife. Funds to further the recreational benefits of fisheries 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 starts the comparison of alternatives by benefit, had the alternative been written differently.

The introduction to Chapter 2 states that all the alternatives were given equal weight in the management. It is much more informative and useful to know that much more weight was given to the alternative that maximized all of the uses of the area.

Page 2-22, Preferred Alternative

The second sentence of the first paragraph states, in part: "...this alternative chooses the best management action for each issue to fit the specific NCA. We seriously doubt that the proposed management action would be the best management action for habitat, riparian area treatment and wildhorse and the best management action for..."

Pages 2-27 and 2-28, Implementation, Selective Management

Criterial and Tables A2.1, Allotment Categorization: The land ownership objectives are unclear. One interpretation of the category 1 objective is that these lands will be kept in the private ownership. Another interpretation is that these lands will be listed as category 1 are in the checkerboard land pattern where exchanges to block up ownership would facilitate the management of both public and private lands.

The land ownership objectives for Category 1 and 2 both refer to the "planning system". I was under the impression that the RHP was the plan being developed under the "planning system" and as such would identify the specific lands that would be retained because of their value to the public. The lands that would be offered for exchange, sale or other disposal action.

Item 7, under each of the category descriptions, combines into one sentence the information concerning condition, trend and the categorization process. Condition, trend and the categorization 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

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

Page 2-29, Livestock Grazing Treatment

The great variation in weather, topography, climate and other factors makes the use of specific data in this broad, overall plan unrealistic. It would make more sense to describe the treatment in terms of growth stages of certain plants, then the rates of growth and the amount of 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.

Page 2-31, Utilization

You will not manage to 55% utilization on all perennial grasses and 45% utilization on ALL shrubs. Bad 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 RHP and cooperator operated precipitation and temperature stations. The extreme weather conditions, even in the same valley, makes it important that as much data as possible be obtained. It is DO NOT attempt to average the data from various stations to compute climatic adjustment factors.

Condition and Trend

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?

Page 2-32, Standard Operating Procedures

It is noted that the recommendations contained in the Western State's Sagegrouse Guidelines will be

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Comments on Wells R.A. RMP/L15

1 Aug.

Page 1-7, Planning Criteria 3a: Barring, spraying or mechanical control without seeding are usually disappointing on sites where desirable species have up less than 25% of the production. The degree and capacity of the site to produce desirable species is directly related 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 selected species, in addition to brush control.

Page 2-29, Objectives

It is more accurate and meaningful to say the projected number of AUMs constitutes an 85.4-13 AUM or 22% reduction from preference AUMs, than to say an increase of 4-12 AUMs over the time to 100-year licensed use.

The 3-5 year average use simply indicates the amount of voluntary use taken for various reasons, over the 3-5 year period, and does not indicate the amount of use that would be required to 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 12-11).

The condition-trend etc. factor was rated '1' on 23 of the 89 allotments. On these 23 allotments the 3-5 year use ranged from 45.7% of preference to 115.9% of preference, with an average of 81.1%.

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 '1', because they need improvement, showed the least non-use being taken, while the allotments said to be satisfactory averaged the highest non-use. This is a very misleading picture, and the professional judgement used in categorizing the allotments or the theory that the 3-

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Comments on Wells R.A. RMP/E15

Page 10

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 to be done to improve the range. Then is indicated in paragraphs 1 and 2 under this item.

My understanding has been that this document discusses no improvement for identified areas. It is not clear why the phrase "including areas identified as unsuitable" is included. There 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' category in the first place if grazing systems are needed? Based on this, it is not satisfactory to indicate that the activity plan is not satisfactory. A condition and trend is not satisfactory, improvements are indicated, 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 RECREATION reasonable wildlife numbers. The improvements and RECREATION reasonable wildlife numbers should be programmed over a year period to avoid much of the cost of the program and several 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 the total grazing preference are currently grazed, and 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/Mud Hills area. AUMs were submitted for a number of reasons, ranging from punishment for some attraction of the release to a temporary adjustment to facilitate the

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Page 3-25, Cont'd from

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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.

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

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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 livestock production compared with the existing allotments and the no action alternative?
Allotments under the no action alternative?

Page 4-16, Social Impacts, Livestock grazing.
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. Examples: Spruce-Bushlets has 14 allotments, all of which are in poor condition. Over the period 1975-1980, according to table 2-1, only 3 of these allotments, 1, 2, and 3, only 3 could be improved and receive a portion of the 76,000 AUM increase projected for this RCA. Of the 89 allotments, 56 need less than the permit, but only 25 were placed in category 1's.

As written, the Resource Production alternative could not possibly result in seedlings which would be located properly to "provide for the spring forage needs of current livestock numbers and the majority of the requirements for additional livestock numbers". Improving 25 allotments just would not get this job done.

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 2-1 shows that 60% of the AUMs are in poor condition. Therefore, if just the category 1 allotments are improved, 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 have been able to determine the impact of the proposed action with the wilderness character was discussed in the MSA and therefore should be considered in determining the impact.

Page 4-21, Loss of livestock grazing...

1. Fencing proposals exist on allotments having existing, properly functioning grazing systems. The insertion of fenced stream channels would result in small segments as to interfere with the functioning of the system.

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

3. Fencing may cut off accustomed sources of stock water and adversely affect livestock performance and utilization patterns. Fencing may also result in increased maintenance costs. Fences 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 running of livestock where water gaps are too narrow.

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

5. Locating fences to avoid the impact stated in 4 could cause many more than 1610 acres to be eliminated from grazing under this alternative.

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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 the fences being removed. Fences require 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.

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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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Comments on Wells R.A. RMP/EIS

Page 16

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

Page 4-35, paragraph beginning at bottom of left hand column: Vegetative improvement under the resource production alternative would be implemented in the same manner as the more intensive management proposed under that alternative.

Page 4-36, livestock grazing: How much more is needed, why this exercise? How can a 7.5% increase in grazing be achieved? How can a 10% increase be achieved? How can a 15% increase be achieved? While a 2.1% sales increase results in a 16.1% increase in income.

Page 4-41, livestock grazing: How much more is needed, why this exercise? How can a 7.5% increase in grazing be achieved? How can a 10% increase be achieved? How can a 15% increase be achieved? While a 2.1% sales increase results in a 16.1% increase in income.

Page 4-42, Native range: How much more is needed, why this exercise? How can a 7.5% increase in grazing be achieved? How can a 10% increase be achieved? How can a 15% increase be achieved? While a 2.1% sales increase results in a 16.1% increase in income.

ISSUE #7, WILDERNESS

Page 4-42, Wilderness numbers: What on earth would be the rationale for allowing wilderness numbers to increase by 100% in the Protection alternative? This would be a massive increase in the year one, the impacts of this destructive use are not addressable.

ISSUE #8, TERRESTRIAL WILDLIFE HABITAT

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

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

The actions anticipated to manage the non-native species, and

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Comments on Wells R.A. RMP/EIS

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mountain meadow habitats should be specified as environmental and other effects can be identified.

What would be needed in the 5,500-acre project for big game? What would be needed in the 5,500-acre project for big game? What 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 as the environmental and other effects can be identified.

Page 3-9, Big Game Populations and Habitat Condition: A study, table A3-1, compares the population 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 NDM information, obtained from BLM field offices, indicates that the numbers in the table are not reliable. Most have been made. For Mule Deer, table A3-1 shows a reasonable number of 73,700 while the NDM information indicates a peak month reasonable number of 54,000. The NDM number includes deer in the Nevada Resource Area, private lands, and the Nevada Resource Area. The Nevada 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 or 15,000 head. The Nevada Resource Area, the maximum reasonable number projected 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 of deer in the Nevada Resource Area is 54,000 head, which is the "existing" number reported in the EIS. A similar discrepancy exists in the antelope numbers.

Wildlife habitat condition was determined by numerically rating 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 account the relative importance of the various habitat features. Characteristic, 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

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

The true mutation of the trend in condition for any new requires either a rise in measurements over a period of several years, the results of these measurements must be evaluated very carefully, and during the first of weather conditions mild and pleasant (no fog, fire, insects, rodents and other vermin). The temperature of the wells area has never been quiet on for long enough to make meaningful comparisons, nor to identify the cause of trend if it did exist.

William Werhane will 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 ECLS cites livestock production as the primary reason for the decline in deer abundance and elk habitat. The statement near the bottom of page 100, "Elk habitat is disappearing because of the competition primarily from livestock production," is a good example of this. The most significant cause of poor elk habitat attributes, not with livestock, was this area just naturally marginal elk habitat and even complete removal of livestock will not make it suitable for elk. The statement, "The removal of livestock will make the habitat excellent," is also a good example of this.

Stage 4-5. Determination of significant impacts, terrestrial wildlife habitat.

Threshold number 4. States that any action which results in 50% or more loss of wildlife habitat, including loss of deer habitat, or a poor condition is an adverse impact of deer habitat.

Threshold number 5. States that any action which results in 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 is an adverse impact of deer habitat.

Stage 5-6. Present time. How can this be a suitable threshold for already present time? How can this be a suitable threshold for already present time? How can this be a suitable existing situation already existing the stated level?

440 data is presented to show that 50% of the area used as
441 big game habitat has site characteristics capable of supporting
442 fair or better habitat condition. Without evidence that this

[illegible][illegible]

1059 (484). *Melospiza cinerea*.
1060 (11112). *Spizella monticola*. *Melospiza*

[illegible]

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

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OBJECTIVE / MANAGEMENT SOLUTIONS

ISSUE 1: LANDS

Beitrag zur Entwicklung des (Sammel-)Kunstbegriffs (1941) (Sammel-)Kunstbegriff

Short and Long-term Management Actions

1. Disposal of 42,150 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 function)

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 31 ACCESS

Objective: To acquire legal access for routes necessary for

N-1 GRAZING BOARD Proposed 6th Alternative, Wells RHP-Page 2

Long-Term Management

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

ISSUE 41: RECREATION

Short-Term Management Actions: Develop a plan 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. Install 100 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 harassing wildlife or livestock or are interfering with other land uses and close these to ORV use.

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

ISSUE 51: WILDERNESS

Objective: (Same as no-action)

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

ISSUE 61: WILDLIFE GRAZING

N-1 GRAZING BOARD Proposed 6th Alternative, Wells RHP-Page 3

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 increase this use. Long-Term Management Actions: Develop a plan to negotiate cooperative planning with private landowners to develop and implement management actions necessary to meet this objective.

Short-Term Management Actions:

1. Review the categorization procedure described in the RHP/FIL document and, after consultation with the grazing operators, develop a plan to implement management actions to improve condition, range trend and productive potential and on the desires of the livestock operators.

2. Develop grazing plans for those allotments where no fence improvements and/or other management actions are needed, and where the livestock operators are willing to participate. The plan will consider all uses of the allotment and will include the treatments and practices needed for wildlife habitat enhancement 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 undue 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.

N-1 GRAZING BOARD Proposed 6th Alternative, Wells RMP-Page 4

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.
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.

6

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

N-1 GRAZING BOARD Proposed 6th Alternative, Wells RMP-Page 5

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, and 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 private-property conversions for wildlife or livestock forage enhancement would occur.

IMPLEMENTATION

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

Category II Allotment Characteristics
 Advise 4 to read: "The land ownership objective is to retain these lands in private ownership or to exchange them for other land to facilitate management."

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Revised 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

N-1 GRAZING BOARD Proposed 6th Alternative, Wells NR-1 map, 11

high."

Add "10. Watersheds are in satisfactory condition."

Category 1 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 "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 2 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-Climate 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. These data would be used to assess seasonal weather variations occurring in different parts of the allotment and to correlate plant growth as determined in the utilization and trend studies."

STANDARD OPERATING PROCEDURES (Page 2-31)

Modify item 9 to read: "Alteration of sagebrush stands other

N-1 GRAZING BOARD Proposed 6th Alternative, Wells NR-1 map, 11

through application of herbicides, prescribed burning or by mechanical means will be guided by the procedures outlined in the Western State's sagebrush management plan. The removal of or control of nonforage plants and shrubs will be a result of herbicide research projects and other studies."

8-16-83

DEAR BOB,

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 PREPARED BY THE NEVADA GAMING BOARD, N-1 DISTRICT WHICH LOOKS RETAINABLE 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 GIVING LONG TERM STOCKING RATES IN THE 3 TO 5 YEAR AVERAGE USE. IN ONE CASE, I KNOW THAT WE WERE DEMOCRATICALLY HELD

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-2

DOWN THE STOCKING RATE BECAUSE WE HAVE EXPERIENCED SOME PESTY SEVERE DEATH YEARS AND, PARTICULARLY THE LAST THREE YEARS ON THE RUBY VALLEY SIDE, HAVE SEEN AN ENORMOUS CONCENTRATION OF JACK RABBIT; 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 THE SHOULD NOT BE ARBITRARILY TAKEN FROM US WITHOUT COMPENSATION.

Sincerely,

Harry Jones

QUALITY HEREFORDS

Mr and Mrs Robert R. Wright
 14601 N. 2nd St.
 Wells, Nevada 89435
 752-3764

Aug. 1st, 1983

Mr. Rod Harris,
 District Mgr., Elko B.L.M.,
 P.O. Box 831
 Elko, Nev. 89601

Dear Rod:

I wish to send 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 Advisory Board. This alternative is a combination of some of the previous alternatives as well as adding our 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 Wright, Pres.
 Robert R. Wright Co.

The Wildlife Society

Nevada Chapter

August 12, 1983

Rodney Harris, District Manager
 Elko District
 BLM Resource Management
 2002 Idaho St.
 P.O. Box 831
 Elko, NV 89601

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 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, naturalists, and conservationists dedicated to the 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 interests of the Society are not limited to other organisms, but to the total dependency upon the environment and it is the Society's belief that, in its myriad forms, is basic to the maintenance of a quality human existence.

We believe that the impact analysis section has not adequately addressed competition among wildlife, livestock, and humans. The Nevada Chapter supports 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 a loss of such economic value to the area. Simple fence modifications would both the adverse effects of fences 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

Mr. Rodney Harris
August 12, 1983
Page 2

percentage of the total rangeland resource (less than 1% of the public land in the Nevada Chapter) and that the proposed riparian habitat protection would result in a maximum protection (see position of 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 the best habitat for riparian wildlife. The riparian habitat should be managed to 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. Bad 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 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. Mohlin

William A. Mohlin, President
Nevada Chapter, TWS

WAM:mp

United States Department of the Interior

FISH AND WILDLIFE SERVICE
GREAT BASIN COMPLEX OFFICE
1000 North Virginia Street, Suite 200
Reno, Nevada 89502-5093

August 15, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P.O. Box 831
Elko, NV 89501

Dear Mr. Harris:

We appreciate the opportunity to comment on your draft Wells Resource Management Plan. The plan 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 32 percent of the BLM administered area is without riparian habitat. The plan does not provide a clear and concise description of the 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 5-2. We recommend that this table be amended to separate the economic impacts of grazing on public lands from other agriculture in the Nevada Chapter. The table should include the following information: 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 5-2? Data on grazing fees would also be useful. We recommend inclusion of a comparable table showing the economic impacts of grazing on public lands. The values prior to the 20 year period of analysis. We feel this EIS is deficient until such information is included.

Page 5-3. 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 recommend that the EIS include a table of the following information (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. The EIS should include a table of the following information: the number of acres of public lands used as one of the deciding criteria. Nationally we are dealing with a dwindling wildlife habitat base, and this approach would preclude additional losses.

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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 condition. However, to correct some poor wildlife habitat criteria 1, e.g., mitigation of conflicts among wildlife and other species, possibly including riparian areas, should be very specific to assure the CMP process works.

Page 1-8, Issue 8 and 9: Consideration should be given to federal responsibility for riparian areas. The importance of riparian areas is 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 aspects of grazing on public lands. In considering only wildlife values, all alternatives presented are 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 to enjoy these resources is not reflected in the economic analysis developed. This should also include economics of business development upon these users (sporting goods, motels, restaurants, service stations, taxidermists, etc., etc.).

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 are 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 to enjoy these resources is not reflected in the economic analysis developed. This should also include economics of business development upon these users (sporting goods, motels, restaurants, service stations, taxidermists, etc., etc.).

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 method of disposal. We would like to see what values and human use thereof being one of the deciding factors.

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Page 2-11, 2-15, 2-20, 2-24, Issue 9: What is meant by "result in a minimum number of condition classes" is not understood. It is not understood 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. The Humboldt River Drainage Basin 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 habitat. The Humboldt River Drainage Basin Management Plan, signed by the Regional Director, U.S. Fish and Wildlife Service, and the Regional Forester, U.S. Forest Service, and State Director, Bureau of Land Management, signed by the Humboldt River District Director, is the plan. Deletions 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 Basin is a 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 step in the process of implementing the plan. The plan is not a condition class. Failure of the Humboldt River plan to satisfy these proposed actions would violate the intent and purpose of the Endangered Species Act. In this context, the BLM should be aware of the following objectives stated in the Humboldt River Drainage Lahontan Cutthroat Trout Management Plan:

- 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 RMP planning
- 2) Completion of fish population surveys

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- 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 including wildlife on all habitats.

Page 2-24, Issue 9: It is recommended that the entire 161 miles (p. 3-12) of riparian habitat be in less than good condition receive upgrading to good condition in the next 10 years. This is a very ambitious goal. Again, the Humboldt River Basin Lahontan Outpost your 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 in place for Bald Eagles? Are there any proposed plans for possible reproduction (nesting assistance) of peregrine falcons into known historic habitat (Salt Lake City)? Four bird species (Ferruginous hawk, Swainson's hawk, Long-billed curlew, and the California gull) are considered candidate species by FWS. Information indicates that the BLM has not conducted a study under the Endangered Species Act, pending additional data. We would like to see effects of possible alternative actions on these species addressed in the RMP/EIS. Consideration of these actions on candidate species is necessary to insure that future listing of those species will not be necessary.

Page 3-12 Redbad trout and Relict dace are both candidate species for listing under the Endangered Species Act. Does the BLM have any management plans for these species? Do you have any proposed roads, 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 and economic conditions 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?

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 average conditions for upland game and waterfowl should produce substantial gains in these areas. The omission of user days from 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?

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? Is the dollar value of user days presented in this table an average value for all types combined, and an average value for all types combined.

Page A5-11 Is Table A5-4 a complete analysis of expenditures generated through activities? Are expenditures for hunting and fishing proportion of such expenditures frequently occur beyond the limited number 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 effort to adequately address the wildlife values of the Wells Resource Area.

Sincerely,

Donald J. Grogg
Complex Manager

Dear Mr. Harris,

I approve of the Nevada Grazing Board's alternative grazing plan.

August 15, 1983

Yours Truly,

James R. Harris

Clara Valley
Nevada, 89835
Aug. 16, 1983

Mr. Rodney Harris
Director of Forest Management
Elko, NV, 89801

Dear Mr. Harris,

Regarding the 11th Resource
Management Plan, of
Bureau of the Office of
Range and Grazing, I am
writing to report that I
will not be able to attend
the 11th Resource

Sincerely,

James R. Harris

David G. Johns
K C Ranch
Clover Valley
Wells, Nevada 89555
August 17, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 631
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 in carrying out the carrying preference would be 63.5%. It should have read 55.5% cut based on the three-year average use.

Sincerely,

David G. Johns

89113

David G. Johns
K C Ranch
Clover Valley
Wells, Nevada 89555
August 17, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 631
Elko, Nevada 89801

Dear Mr. Harris:

I am involved with my father in working in Clover Valley. As a user of the Chase Springs and Tohar Allotment I endorse the Sixth Alternative to the Wells Environmental Plan for the Wells Resource Area Management Plan as developed by the Bureau of Land Management. I would like to see use this to develop a cooperative atmosphere of all these factions which use the Federal lands.

Sincerely,

David G. Johns

U X LIVESTOCK COMPANY

8/15/83

RUBY VALLEY, NEVADA

S. Neil Herfritz
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.

1. No 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 around 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.

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,

Elmer McGinnis

18

Memo

Tom
HAWKS AND SON

To Mr. Harris

*We would like to
see the sixth alternate
added to the well
fenced area because
the agency is the.*

Elmer Hawks

BURLEY BUTTE CUSTOM FEEDLOT
Box R, Burley, Idaho 83318
1 - 208 - 678-2844

REGISTERED & COMMERCIAL HEREFORDS

SMITH BROS. OX RANCH
RUBY VALLEY, NEVADA 89833
702 796-2293

Aug. 12, 1983

Mr. Rod Barria
Bureau of Land Management
2002 Idaho St.
Elko, Nevada

Dear Mr. Barria:

In the matter of the Wells BMP and EIS, we wish to go on record to state the following:

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 needs of the ranchers who live and work on the ranches in the Wells Resource Area. It is obvious that if your action was preferred 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. Burford promotes a program which would require the ranchers to accept a decrease in livestock, 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 paid and by the Preferred Alternative Table 2 - 5.
 - B. Burford promotes a program which would require the ranchers to accept a decrease of their allotments where they could see and benefit from their efforts.
 - C. The oral hearing held in the Wells High School proved to us there are many potential stewards more capable to carry out this great program than the individual 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 D. 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 user and more equitable use under this better program.
 - E. There would be a much improved relationship between the BMP 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 BA or wildlife as much as a full fledged Stewardship Program.
 - G. The Burford Alternative would require the ranchers to accept a decrease in livestock and carrying out programs fully backed by Mr. Watt and Mr. Burford. We would like to know why the BMP doesn't mention the Stewardship Program so that this matter can be brought to the attention of Mr. Burford.
 - H. We want to register our complaint that the Wells BMP and EIS is in direct violation of the National Antidegradation Policy.
 - I. Any change of existing law except by the congress of the U.S. is unconstitutional.
 - J. We feel there are many good points in the Nevada Grazing Board N I Alter-

native 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 from it was received in such a way that the Preferred Alternative makes the rancher look like a loser.

5. The Preferred Alternative attempts to take from the ranches, their vested grazing rights that were created and "ceased" during the last 120 years of use. These ranches, during this period of use, created a "claim" the same as the "claim" when someone bought a piece of land and made improvements on it. The ranchers are 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 BMP

Sincerely,

Smith Bros. O X Ranch
Bert N. Smith

702-779-2293

Mr. Rod Harris
Bureau of Land Management
2002 Idaho St.
Elko, Nevada 87

93

[illegible]

7. Our allotment process (instead of a period of 3 months) is too long.
8. I feel page 2 - 30 contains comments about climatic data that should be changed.
9. The rain fall in Ruby is greatly varied thru out the valley as I imagine it is thru out the cells R.
10. I feel there are some Bureau personnel who could have a field day with the grading Boards Alternative Issue. I bet they could really twist thaso to their liking.

15. Specific range management practices such as spraying and cutting have not been decreased.

Sincerely,

1100 VALLEY ROAD

P.O. BOX 0678

RENO, NEVADA 89502-0622

TELEPHONE (702) 784-4214

WILLIAM A. HOLIN
DIRECTOR

RICHARD H. BRYAN
DIRECTOR

July 5, 1983

Ms. Linda Ryan
Director
Office of Community Services
1100 Bureau of Wildlife Management
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 (SAL NV #83300086). The EIS does present a detailed evaluation of planning issues and criteria, alternatives, affected environment, and 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 which describe riparian conditions are particularly well presented and provide strong commitments towards resolving conflicts at designated sites.

The Department does recognize the Bureau's mandate to manage all resource values under the multiple use concept and therefore the EIS does not present a "preferred" alternative. We see no reason to 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. To summarize, we have relative to the Preferred Alternative include the following:

We question whether the 1 category allotments can accommodate 35,000 acres of designated corridors and 100,000 acres of riparian/wetland and seriously separate, significant amount of wildlife habitat. A total of 63,000 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 vegetation removal, the proposed riparian/wetland allotments 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."

Ms. Linda Ryan
July 5, 1983
Page 2

Also, it is unclear whether the total acreage is a firm commitment or whether it is a goal. The EIS does not state whether the goal is a firm commitment. With 3,323,000 (62%) of the resource under neither AP'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 be a significant achievement and would be a major step towards the conversions. It is stated in the EIS that "on areas under AP's and grazing systems designed to allow for periodic food storage, seed production, and seedling establishment of desirable plants, ecologic condition and improvement relatively quickly." We would recommend that the EIS be revised to address goals for numbers of AP's to be completed in a given time frame.

We would suggest that the top priority for wildlife would be to favor riparian/wetland areas with the highest wildlife values. 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 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 implementation of wildlife projects are not identified in the EIS. If wildlife needs are an integral part and given full consideration, based on identified values and requirements, in all AP'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, AGIC's, and/or T & E species habitat.

PAGE 1-3, 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 wetland vegetation.

Ms. Linda Ryan
July 1, 1983
Page 3

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 piling, means of brush removal be given equal consideration with spray or fire in any vegetal conversion proposal. Often the removal of brush and the maintenance of wildlife habitat are considered mutually exclusive. 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 the removal of brush. The removal of brush should 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 fish and/or protected species, and sport fishing.

CHAPTER 2 ALTERNATIVES

All RCA's should state there are conflicts occurring between wildlife and the private sector. The areas which should be identified for individual areas include the following:

PAGE 2-1, SPRUCE/COSHITES RCA

We would recommend that the maintenance and enhancement of key deer winter range be included as a primary conflict in this RCA.

Ms. Linda Ryan
July 5, 1983
Page 4

PAGE 2-2, PILOT/CRITTENDEN RCA

Pilot Peak provides habitat and supports a limited population of Labrador cuthroat 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 deer, mule deer, and antelope.

PAGE 2-2, MANAGEMENT ALTERNATIVES

The management classification (O, R/C, R/M) is rather confusing and particularly the one where it outlines the 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 resources 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 necessarily desirable. We suggest that the areas designated for disposal to 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 91100 acres could jeopardize a number of valuable resources. We would recommend that the areas designated for disposal be 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. The disposal of lands immediately around Wells, Montello and Mendover are not a major problem.

Ms. Linda Ryan
July 5, 1983
Page 5

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 GRADING, 3

We wholly support the development of APV's and grazing systems on all category allotments, and 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 adjusted. 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.

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 grazing. Grazing is one method, but not the only one. Other grazing systems 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

Chain or burn and seed 5,500 acres to improve crucial big game habitat should be considered. Grazing systems may be beneficial, but livestock removal is a must until "IP" 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.

Ms. Linda Ryan
July 5, 1983
Page 6

PAGE 2-25, ISSUE 10: 6

To successfully rewildify deteriorated riparian 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

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 3-5, 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 effects of 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
Page 1

PAGE 3-14, SIGNIFICANT HABITAT CONFLICTS

We totally support the statement, "In most cases, livestock grazing was probably 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 in support to the statement if some specific findings of other studies were included in the EIS.

PAGE 3-23, LIVESTOCK GRAZING

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 ADUs 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 3-26, WILDLIFE HABITAT

What is really gained in the EIS when statements such as "most interviewers did not think cattle competed for forage with other wildlife", "cattle do not create that much of a problem on good fishing streams", and "cattle do not 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

The statement that "the complete removal of even one plant from any of these populations would be considered a threat to the survival of the species" in 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 the constraints of wildlife habitat. We would like to know what the value of the lands would be if the valuable resource values as they presently exist on these 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
July 5, 1983
Page 8

PAGE 4-5, ISSUE 8: 4 & 5

We would request that the fair condition be changed to good in number of condition classes. This condition be changed to fair to signify significant beneficial or adverse impacts.

PAGE 4-55, ISSUE 8: 6

We question whether the Ruby/Rood 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 created 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.

It is also rather difficult to interpret the reasonable numbers because the RCAs combine areas different than our bird management units. The Department has calculated reasonable numbers on bird management areas. We do question the existing number of 30 antelope in the Ruby/Rood Hills and Metropolis RCAs. We would like to see these 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 Spivey Creek and Ruby/Rood RCAs. Existing elk in this area are probably only transient animals.

A 5-10, TABLE A5-3 WILDLIFE REC. DAYS MPA

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 MPA.

Comment Letter 29

cc: Region III

5123

Clearinghouse Comments. #81300086, Wells Resource Area, RWP - EIS

Solid Waste-Doug Martin: Several towns in the resource area have existing RWP leases for solid waste disposal sites yet there is no mention of this or other solid waste issues, for example, the BLM National Register of Historic Places. If solid waste disposal sites in the resource area have on the local landfill and what does BLM plan doing if they expand or close the compground?

RICHARD H. MARTIN
Governor

STATE OF NEVADA

RONALD O. WETTERGARD
State Historic Preservation Officer

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF HISTORIC PRESERVATION AND ARCHITECTURE

201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 883-5138

August 17, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
National Register of Historic Places
P.O. Box 831
Carson City, Nevada 89401
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, many of the National Register-eligible 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 National Historic Preservation Act (NHPA) and National Antiquities Act (NAA) requirements. The BLM is currently conducting a 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 BLM will continue to conduct investigations in planning, the more easily they are resolved before plans become formalized.

Native American consultation should be a consideration during the planning of large projects and the BLM will continue to make 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

AMS/lmw

cc: John Walker, Office of Community Services
Re: 81300086
Ed Spang, State Director, RLM

Natural Resources Defense Council, Inc.

25 MARINA STREET
LOS ANGELES, CALIFORNIA 90048
TEL 451-6900

Station, Los Angeles
C. J. HARRIS, JR.
NATURAL RESOURCES DEFENSE COUNCIL
400 442-8400

Los Angeles, California
400 442-8400
400 442-8400

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 vague and generalized that they will not constrain or limit future range management actions. The RMP/EIS does not provide 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), 1100-5 (1982) (definition of "land use plan"). The EIS also fails to provide the information required by the National Forest Management Act. See NRDC v. Morton, 388 F. Supp. 829 (D.C. 1974). Given these deficiencies, as detailed below, the draft should be revised and resubmitted. See 40 C.F.R. § 1502.3(d) (1982).

One crucial shortcoming of the RMP/EIS is its failure to analyze specific proposals for range management, even though the RMP/EIS contains numerous specific proposals for various 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, the number of allotments, numbers of livestock, seasons of use, maximum utilization of livestock, and other relevant information. See NRDC v. Morton, supra; 43 C.F.R. § 4120.2-1(a) (1982).

Although the proposals and alternatives in the EIS include grazing, the EIS does not provide the information necessary to make a reasoned choice among alternatives. The Bureau states

See EIS and Draft EIS, 43 U.S.C. § 1712; 43 C.F.R. § 1601.0-5(k) (1983), 1100-5 (1982) (definition of "land use plan").

See also EIS.

Los Angeles, California
August 16, 1983
Page Two

that it will "provide additional information and grazing systems under the RMP/EIS (p. 3-14). The RMP/EIS does not provide the information under the "no action" alternative, existing AMFs and grazing systems are mentioned but not described. (p. 3-7.) Similarly, the RMP/EIS does not provide the information under the "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 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 since 1960, the RMP/EIS does not provide specific proposals. The EIS lacks any remedial proposals. Under the circumstances, 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 (40 C.F.R. § 1502.2). The EIS also fails to provide the information required by 43 U.S.C. § 1712; 43 C.F.R. § 1601.0-5(k) (1983), 1100-5 (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 is not supported by the reasons stated in the attached memoranda from BLM officials in Colorado and New Mexico.

Another fundamental deficiency of the EIS is the absence of essential range and resource condition data. The EIS is deficient in that it does not provide the information required by 43 U.S.C. § 1712; 43 C.F.R. § 1601.0-5(k) (1983), 1100-5 (1982). The EIS lacks estimates of current and future grazing capacity, which are essential to prevent overgrazing. The Bureau has long conceded that the RMP/EIS does not provide the information required by 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.

Given the absence of specific proposals and baseline information, the EIS's environmental impact analysis is totally inadequate. The EIS does not provide the information required by 43 U.S.C. § 1712; 43 C.F.R. § 1601.0-5(k) (1983), 1100-5 (1982). The EIS lacks "proper reason of use" (p. 4-3), even though such "proper"

Comment Letter 31

Rodney Harris
August 16, 1983
Page Three

seasons are never identified. Improvements in condition are predicted (e.g., pp. 4-32 to 4-33) but never explained or justified according to the standards of NEPA. The analysis of adverse impacts to permittees of reduced grazing (e.g., Tables 3-2, 3-2) while ignoring the adverse environmental impacts to the public lands of existing and proposed grazing. In short, the impact analysis only considers the environmental benefits based on these hypothetical actions.

The EIS also fails to analyze the potentially serious adverse impacts to the public lands of the West. 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 the use of herbicides. The analysis is required by NEPA. See, e.g., *Save Our Ecosystems v. Watt*, Civ. No. 83-6090-E (D. Ore. May 6, 1983); *McGrelli v. Block*, Civ. No. 81-6138-E (D. Ore. April 19, 1983); *Southern Oregon Citizens Against Grazing v. BLM*, Civ. No. 83-6090-E (D. Ore. May 6, 1983). 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 make an informed decision as to whether or not to allow. 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. § 1506.22 (1982).

In conclusion, the range management provisions of the draft RMP/EIS should be completely revised and circulated for comment. The EIS should be revised to meet 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

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Comment Letter 31

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Roswell Resource Area

P. O. Drawer 1857

Roswell, New Mexico 88201

RECEIVED
JUL 27 1983

JUL 27 1983
BUDG CALIF.

Dear Public Land User:

This letter is to inform you of the addition of Alternative 5 to the West Roswell Management Framework Plan 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
- Reduced livestock grazing use, b
- No Grazing
- Increased livestock grazing use."

As you may recall, at our public meeting in March of this year we made the statement that we would 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 decisions. 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 the EIS. The EIS has been 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,

Philip H. K.

Area Manager
Roswell Resource Area

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
2000 N. 5th Street
DENVER, COLORADO 80202

RECEIVED
AUG 1 1983
NRDC CALIF.

December 16, 1981

Invitation, Reclamation No. 82-66

Reclamation No. 82-66

To: District Manager

From: State Director, Colorado

Subject: The "No Grazing" Alternative

Colorado will continue to consider a "No Grazing Alternative" in the future. This EIS is mandated by the RMC for public 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. This would be the "No Grazing Alternative" in the EIS. The EIS would display the full development and analysis of the "No Grazing Alternative" in the EIS. 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 arguments 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."

Enclosure

Enclosure

COMMENT ON WELLS EIS/RMP

June 21, 1993

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 tenets 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 not a complimentary relationship rather than an antagonistic one. If proper stocking rates and management are applied, Williams et al., 1991, found that deer prefer 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 on 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 created wheatgrass seedling, 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 seedlings which were planted about 2 years ago. This document doesn't propose anywhere near the needed maintenance of already existing improvements and seedlings.

2

The Resource Protection Alternative is unacceptable. The underlying premise is that livestock grazing is always to the detriment of the other resource 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 34% 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 mixed fire can create suitable habitats for wildlife, livestock, on 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 these critical areas in Weavie Creek, the Granite Range and the I and D Mountain 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 spread extensively for brush control in the middle 40's.

Their rating of the current management as "unsatisfactory" in the NSA reflects on themselves. The BLM has failed to maintain the ranges by brush control at longer intervals on portions of the range, resulting defoliation

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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 incoherencies 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 an on-site opinion who has observed the vegetation over a long period of time.

On page 2-11 Issue 3, the short-term management action states "Improve 892 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, 1979, 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 riparian forage and improve the native range condition on the higher precipitation area because of longer deferral from grazing. (Resource Production Alternative, page 4-21, Issue 6, paragraph 2.)

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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 (1992) 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. We 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 reverse their selection in favor of upland vegetation in September through October.

We remind 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 inefficient 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 zones 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 fences. This study also found that salt placement did not affect livestock distribution.

Confirming 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 land and a unit's average turnout date of April 22. It is critical that the cattle be removed from the irrigated farm ground in order to plant corn and re-irrigate the cropland. In addition, to feed 7,000 head of cattle 240 tons 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 market place.

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, 1995, lists a ten year permit issued to the Association for 6,500 cattle for eight months and 4,426 ewes for six months (beginning April 13/1996). In January 1996 and "Agreement of Surrendering" the Association put 44,000 AUM's in awarded non-irrigated land with the time that more feed is available either through water developments, management or artificial revegetation". The document lists our Class I permit at 31,304 AUM's (CPR 4130.0-5 (4)(1)). It also states "The Bureau of Land Management agrees to cooperate with the Salmon River Cattlemen's Association through management and/or revegetation to reduce the superior non-irrigated."

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

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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 SYM 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. Shoemaker
 Glenn E. Shoemaker

Brant, Larry D. (1992). Response of Livestock to Riverine Zone Exclusion. J. Range Manage. 35:200-204.
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**QUALITY LIVESTOCK
BOIES RANCHES**
WELLS, NEVADA 89835

August 10, 1983

Mr. J. J. Dugan, 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 Bureau of Land Management, Elko District, Nevada. 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." (WPA-82P/215). The president 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. (WPA-82P/215, 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 and animosity that has been directed toward the ranching industry. 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. As it stands, the BLM is asking us to reduce our AUM's to 48.1% of that to which we are now entitled. 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.

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, but I will guess that is not the case.) The fact that the price of cattle has been dropping since 1978 is a fact alone could vastly affect an assessment of the economic impact of the BLM's proposals.

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 one hundred days). Add this to one ton of hay

Very truly,
John Friend

Vice-President, Boies Ranches

O. John Friend

FLYING 'S' LAND & CATTLE COMPANY
BIG SPRINGS RANCH
WELLS, NEVADA 89835

15 August 1983

Richard Harris
Elko District Manager
Bureau of Land Management
Elko, Nevada

Dear Sir:

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PHOTO: ELKO, NEVADA, FULL STATION BIG SPRINGS RANCH #1

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Page Two

(approximately), per cow and bull in the herd, and one would have 21 cows and 11 bulls. This would require 2160 A3-5. At a cost of \$90 per cow and bull, this would cost \$263,840 A3-5 worth of hay. Assuming that the ranch can produce hay at 85% of market value, we would expect the ranch to have to purchase \$76,840 worth of hay to keep the animals alive that this year. The cost of hay 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 numbers are not based on reality, and the BLM management should not 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. The ranching industry is in a bind, and the BLM has 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 have already pointed out the numerous errors in this document. 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 Protection Area" instead of "Resource Conflict Area.") The "neighboring" 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 bureaucrats. It is evident that the BLM management and its staff are in conflict with others. But even 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. Ranchers would be severely displeased with the AUM reductions in this alternative. Ranchers would be severely displeased with the AUM reductions in this alternative. Ranchers would be severely displeased with the AUM reductions in this alternative." (p 4-32) This is "protection of a resource?"

I have presented just a small portion of the evidence that the BLM is patently antagonistic towards the ranching community and that seemingly every action that the BLM takes out of economic or ranching calculations of our economic viability are simple errors, we would expect

15 August 1983
Page Three

them to be corrected and their preferred alternative to be adjusted accordingly. 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 objectives as follows: "To 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 operation is willing to actively cooperate on planning and employment of management recommendations 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 status quo. The BLM management has stated that the 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/ad

FLYING "S" LAND & CATTLE COMPANY

**BIG SPRINGS RANCH
WELLS, NEVADA 89055**

15 August 1983

Mr. Rod Harris
Elko 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-BMP/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 Ruth
Manager
Big Springs Ranch
Flying "S" Land & Cattle

DR/pd
CCT: Bob Wright

PHONE: ELKO, NEVADA, TOLL FREE: BIG SPRINGS RANCH #1

Sierra Pacific Power Company

August 18, 1983

Mr. Rodney Harris, Manager
Elko District
Bureau of Land Management
P.O. Box 811
Elko, NV 89001
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. RMP Elko District, Wells Resource Area is the only corridor in the Wells Resource Area that is not a designated corridor 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, railroad) facilities, both existing and proposed, are located."

b) Problem:

Sierra Pacific finds this definition to be misleading and not consistent with the definitions of 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 located within the "Corridor." The definition of "designated corridor" needs to be included in the Glossary.

Mr. Harris
August 16, 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 complementary utility transmission (powerlines, gas pipelines, telecommunications, etc.) and/or (freeway, 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 proposed to be maintained, expanded, or replaced, 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 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. (Sierra Pacific's representative) and the BLM, we were informed of specific constraints and stipulations within corridor V-K-Y-WM-Q (see map 2-9). Yet, these constraints and stipulations (i.e., no new transmission lines 60 feet from the corridor, addressed in the Draft RMP and EIS) were not made public. 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.

Mr. Harris
August 16, 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, the proposed corridor segment and selection of the P-GG-WM-Q corridor segment to protect wilderness quality of the South Pequot and Goshute Peak WSA's respectively." (Emphasis Added)
- Chapter 4 - Environmental Consequences - Mid-range Alternative - Issue 2: CORRIDORS - page 4-31
- Alternative 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 by the construction and use of the corridors. Impacts are generally fewer than in the Resource Production Alternative. Corridor segments G-P; K-I; I-U; and U-P on Map 2-9 would cause significant visual impairment.
- The solitude and primitive recreation experience within the northern portion of the South Pequot WSA would be impaired by the construction and use of the proposed corridor segment Q-XXY-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 impair the solitude and primitive recreation but would also cause the loss of naturalness in the area." (Emphasis Added)

Mr. Hartila
August 18, 1983
Page 4

b) Problems:

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. It is not one of the "buffer zones" that the Act requires. It encroaches upon a WSA. Corridor distances from WSA boundaries range from common boundaries to a six-mile (6) separation. Sierra Pacific feels that the Act requires a buffer zone around the WSA, but if a WSA cannot stand on its own merits, 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 System. Since the WSA is a peak area, it is 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 was passed, 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.

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.

4. a)

Draft RMP/EIS Quote:

Chapter 4 - Environmental Consequences - Mid-range Alternative - Issue 2: CORRIDORS page 4-31
Alternative - Issue 2: CORRIDORS page 4-31
Alternative - Issue 2: CORRIDORS page 4-31

"Bald eagles would be adversely impacted from the proposed construction of the corridor. As a result of the potential placement of the corridor, the wintering P-O. Wintering bald eagles would be adversely impacted if construction took place from November 1 to March 31 on segment 1-U."

Mr. Hartila
August 18, 1983
Page 5

b) Problems:

Sierra Pacific questions the first sentence of the above-mentioned paragraph. Sierra Pacific is uncomfortable with the statement that the BLM appears to have taken 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 by the BLM. The BLM is not a research and development industry, through years of research and experience, it is able to mitigate adverse impacts to raptors. Mitigation measures can either enhance raptor habitat or reduce raptor impacts from areas such as mentioned in this RMP.

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 project related on a case by case basis and would be determined by the BLM. Therefore, Sierra Pacific Power Company requests that the BLM delete the paragraph on bald eagles. 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 the future. The BLM must have a reasonably accurate map to represent the ATFT Corridor A or E-PP-I-U-22-B to represent the ATFT Transcontinental Cable. This corridor was also represented in the Western Regional Corridor Study. The BLM must have a reasonably accurate map to represent the ATFT Corridor A or E-PP-I-U-22-B to represent the ATFT Transcontinental Cable. This corridor was also represented in the Western Regional Corridor Study. The BLM must have a reasonably accurate map to represent the ATFT Corridor A or E-PP-I-U-22-B to represent the ATFT Transcontinental Cable. This corridor was also represented in the Western Regional Corridor Study.

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.

Mr. Hartis
August 18, 1983
Page 6

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 AN&T Transcontinental Cable on Map 2-9.
- 2) Implement the corridor changes and additions shown on the Draft RMP and EIS. The "Elko" Quad Map (Exhibit "A") and the "Elko" Quad Map (Exhibit "B"). The solid black line represents the Draft RMP and EIS corridor location. The solid red line represents the location of the corridor as shown on the Draft RMP and EIS. 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 Draft RMP and EIS. It is hoped that BLM may want to consider implementing portions of this in the Final RMP and EIS.

6. a) Draft RMP and EIS Quoter:

Chapter 2 - Preferred Alternative - Issue 1:
Lands page 2-22

"Objective: To allow disposals, land tenure and management decisions to be made on a long-range basis. 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 value of resource values and are shown on Map 2-7.

Short- and Long-Term Management Action: To provide for the orderly and orderly community expansion lands, primarily through public sale."

Mr. Hartis
August 16, 1983
Page 7

- 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 is concerned with the retention of 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 powerplant sites be "blocked" up in either R/C or R/M areas?
- c) Solution: As you can see, Sierra Pacific has many needs and concerns. The first is the retention of the terms Retention/Consolidation - R/C or Retention/Management - R/M 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 the future. 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

2

EXHIBIT "A"

SUMMARY - CORRIDOR SEGMENTS

This exhibit is hereby made a part of Sierra Pacific's comments on the Draft Wells RMP and FIS. The following is a written analysis of the proposed Corridor Map 2-9 in the Draft RMP and FIS. This written analysis is to be used along with Exhibits "A" and "B" to address the BLM proposal and requested changes by Sierra Pacific.

Corridor Segment

F-C

Comments

A one and one-half mile corridor each side of Highway 93 from the Idaho border to Henry, Nevada; thence, straight south, presumably to the Nevada border, to address the BLM proposal and requested changes by Sierra Pacific.

The corridor needs to be modified as shown on Exhibit "A." A corridor thru the Jackpot community and its logical expansion, including Highway 93, Sierra Pacific would then request the expansion of the corridor to the area between the Jackpot Channel, south of Jackpot, to "G" are self-explanatory.

It is presumed that the intent of the BLM proposal was to follow the existing SPCCO 345 kV transmission line and Ater Cable.

The plotting of the 345 kV transmission line has pointed out some major mapping discrepancies. Also, field investigation has found extensive agricultural fields and ranches along the Highway. Exhibit "A" reflects where the corridor should be along with some suggested changes. Also, the corridor needs to be located in this area.

RMP:

SPCCO:

RMP:

SPCCO:

G-10-A-2

G-10-I-X

RMP:

SPCCO:

H-U-5

RMP:

10-10-22-B

SPCCO:

S-B

RMP:

SPCCO:

V-K-Y

RMP:

S-K

It is presumed that the intent of this corridor was to generally follow the IPCO 138kV transmission line and Highway 93 to Wells, Nevada.

Suggest that the corridor be designated as outlined on Exhibit "A."

This corridor was generally shown on the BLM map. Study and is supposed to be Ater Cable.

Field investigation shows the Ater Cable to be further north. The Ater Cable needs to be more accurately located on Map 2-9. Sierra Pacific will offer BLM a request in this matter upon request.

This corridor generally follows the Southern Pacific Railroad and Highway 10 from Coburn, Nevada to a point approximately three miles northeast of Montello, Nevada; thence, north to the presumed Ater Cable corridor.

The corridor on the south side of the Southern Pacific Railroad should be located north of Montello, Nevada, to the Utah border should be included in the Final RMP and FIS. BLM has cited the Peregrine Falcon habitat as a reason for the corridor. Sierra Pacific does not support or agree with these findings. BLM is basing its decision on historical habitat as opposed to current habitat. The Draft RMP and FIS does not inventory any Peregrine Falcons within this area.

No mapping problems.

No continuous corridor along Southern Pacific Railroad from Coburn, Nevada, to Wells, Nevada.

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 not needed. They are needed for the crossing of the Pequop Mountains. Because of topographic constraints, a split corridor is recommended as shown on Exhibit "B."

RMP: Corridor follows the Nevada Northern Railroad.

SPPCo: No problem with mapping or corridor. Corridor (M) Corridor segment M-LI should be moved west as shown on Exhibit "B" so as to avoid Goshute Lake.

RMP: No mapping problems.

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 is the location of the Western Pacific Railroad. This corridor is not included in a corridor. Sierra Pacific recommends that the corridors be altered in this area per Exhibits "A" and "B."

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 south. This, coupled with the community expansion, makes passage extremely difficult. Sierra Pacific recommends a two-mile (2) wide corridor be established through the mountains as shown on Exhibit "B."

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 those corridors. The Nevada map raises questions whether the Elk District has contacted the adjacent BLM Districts in Utah to discuss the corridor. Sierra Pacific recommends that these corridors be addressed in the Final RMP and EIS.

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 those corridors. The Nevada map raises questions whether the Elk District has contacted the adjacent BLM Districts in Utah to discuss the corridor. Sierra Pacific recommends that these corridors be addressed in the Final RMP and EIS.

LOS ANGELES

 
77	101	ANTHONY BLVD	STATE	ACTIVE
78	101	ANTHONY BLVD	STATE	ACTIVE
79	101	ANTHONY BLVD	STATE	ACTIVE
80	101	ANTHONY BLVD	STATE	ACTIVE
81	101	ANTHONY BLVD	STATE	ACTIVE
82	101	ANTHONY BLVD	STATE	ACTIVE
83	101	ANTHONY BLVD	STATE	ACTIVE
84	101	ANTHONY BLVD	STATE	ACTIVE
85	101	ANTHONY BLVD	STATE	ACTIVE
86	101	ANTHONY BLVD	STATE	ACTIVE
87	101	ANTHONY BLVD	STATE	ACTIVE
88	101	ANTHONY BLVD	STATE	ACTIVE
89	101	ANTHONY BLVD	STATE	ACTIVE
90	101	ANTHONY BLVD	STATE	ACTIVE
91	101	ANTHONY BLVD	STATE	ACTIVE
92	101	ANTHONY BLVD	STATE	ACTIVE
93	101	ANTHONY BLVD	STATE	ACTIVE
94	101	ANTHONY BLVD	STATE	ACTIVE
95	101	ANTHONY BLVD	STATE	ACTIVE
96	101	ANTHONY BLVD	STATE	ACTIVE
97	101	ANTHONY BLVD	STATE	ACTIVE
98	101	ANTHONY BLVD	STATE	ACTIVE
99	101	ANTHONY BLVD	STATE	ACTIVE
100	101	ANTHONY BLVD	STATE	ACTIVE

RMP CORRIDORS
RECOMMENDED CORRIDOR CHANGE

EXHIBIT A

These comments
 

EXHIBIT B

Lands of Sierra,
SUBSIDIARY OF SIERRA PACIFIC POWER CO.

100 EAST HOVANA LANE
P.O. BOX 1000, RENO, NEVADA 89510 • TELEPHONE (775)

August 14, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
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 a Nevada corporation which owns and operates the Wells Resource Area 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. Checkboard ownership and isolated tracts of other private owners 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 offering could significantly affect our plans for consolidation and land improvements. As these lands are within the checkboard 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, rather than disposal. These tracts 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 agree, 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 company if we were to be required to meet the requirements of the disposal 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

Mr. Rodney Harris
August 18, 1983
Page 2

hope that the land disposal program will likewise be diminished. We request that you consider the future, that the present licenses 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 disposal classification. This classification 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 sold or transferred to the federal government. Under the disposal classification of this twenty year plan due to some future policy change, the licenses 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 consider the future of the Wells Resource Area as possible, in the event that these lands are scheduled for disposal.

On Page 2-5, the acreage listed under the "Private Acres" heading for the Gamble Ranch Headquarters is 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 as a RMC 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 Pilot Valley allotment are not included in the disposal classification. 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,

[Signature]

Gary M. Soule,
Vice President

GMS/MP/S/s

cc: Ed Spang, BLM
Nevada State Director

Dear Sirs:

My name is Maurice Fuller and I am a stockholder and at present the President of the Salmon River Cattlemen'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. recieved 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 Cattlemen'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.

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 1 1/2 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 recieve back these 4000 A.U.M.'s after these improvements were made. After 15 years the S.R.C.A. have still not recieve these A.U.M.'s back.

Sincerely yours,

Maurice Sullivan

Maurice Fuller
President of the Salmon River Cattlemans Association
Route 2 Box 5536
Twin Falls, Idaho 83301

SIERRA CLUB

Toyabe Chapter Nevada and Eastern California

D. A. M. F. et al.

☐ GREAT BASIN GROUP
P.O. Box 6030
University Station
Reno, Nevada 89507

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 West Resource Area Resource Management Plan and Environmental Impact Statement. We think you and your staff have done a great deal of work on the document and we appreciate the opportunity to offer our comments. We divide this letter into three areas: Resource Conflict, ARA 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 or stating the reasons for supporting the adoption of an alternative.

We favor the preferred alternative on the wilderness issue and congratulate your staff on the excellent presentation of this issue. The four NSAs in the package are the most 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 massive wilderness with its spectacular canyon walls and the fine trout fishing in Salmon Falls Creek, Rubyell, Goshute Peak, and South Fork of the Snake River are preserved. The areas that are not included are larger areas which provide not only outstanding scenic views but 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 active recreation areas to be designated or upgraded. However, we

8/17/83. Page 2.

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, 54% of the range is in fair condition, 34% in poor condition, 5% in excellent condition, and only 1% in excellent condition. It would appear that some decrease in AUM's would be in order, particularly in RCA's. The increase in AUM's of 5,000 would be in poor condition--over 20% of the range is estimated to be in poor condition--and 40% of the range in poor condition, especially Cherry Creek. It is important that grazing seasons be adjusted so that perennial grasses not be grazed during the critical growth period (early spring through mid-July), and winter fat not be grazed during the winter months. The proposal to increase the number of AUM's for livestock grazing improvement would increase the number of AUM's. We favor an alternative on this issue that takes into account the real condition of the range and that is not economically and politically unfeasible such as the 294,000 AUM's. We favor an alternative based on ecological condition. Since no such alternative has been proposed in this direction, the preferred alternative modified in this direction.

To explore, enjoy, and protect the natural mountain scene

9/17/63

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 No Action Alternative. We favor the latter. The question the cutting of 100,000 cords per year, 700,000 acres of woodlands (presumably not including the wilderness recommendations) in the RA. If this is a one tree per acre family permit, it will undoubtedly have little effect, but if the woodlands are to be subjected to such cutting, the all of

One of our grave concerns with the proposed alternative involves the amount of land recommended for land disposal. 193,150 acres is a large amount of land, especially when the proposed mid-range alternative recommends only 18,065 acres. We believe that the proposed alternative is the least environmentally 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 in private ownership. We realize that checkerboard land is sometimes difficult to acquire, but if the public is to sell, there will be no way to acquire the private lands. Therefore, there will be no way to favor the mid-range alternative on land disposal.

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☐ LAS VEGAS GROUP
P.O. Box 18777
Las Vegas, Nevada 89119

Rodney Harris
8/17/83. Page 4

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 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.

Sincerely,

Maynard Sill-

Marjorie Sill
Conservation Chair

☐ LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

August 27, 1983
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 6/28/83 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

Q. 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?

It is not clear from the document what vegetation inventory data (1-2) is available or used by BLM. Table A3-2 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 ORV use 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 RWplan?

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

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To explore, enjoy and protect the natural mountain scene...

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 state 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

RECs. 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).

Collective Management C

Effective 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 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 Callotments are written off by BLM as not improvable violate not only common sense, but also our strong values of resource conservation and good land,ewardship.

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, somehow resulted in an ordinate number of "minor" resource conflicts. The identification of all resource conflicts with the administrative or management of all the allotments in Table A2-2, not match up with the statistical data in Table A2-1. For instance, resource conflicts are identified in many allotments which are then judged to be "M." Yet, M allotments are not identified in Table A2-2. The "M" category can be corrected with a minimal effort. Are we then to believe that the "M" with I C resource conflicts which were judged to be in the "M" category anyway have easily corrected resource conflicts? Or that the 3 RAs with a high intensity conflict level have 16 out of 100 resource conflicts? The "M" category may be changing with the current satisfactory conditions? We are satisfied with the process and feel it should be opened up for public scrutiny.

Table 2-1 (2-3) is also confusing. In the allotments where

54

36

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ISSUE 2: CORRIDORS. We support the Resource Protection Alternative proposal on corridors. We totally reject the 1923 plan. The corridors proposed in the Resource Protection Alternative appear to be more acreage for production as exhorbitant. It seems that more acreage for production is proposed than acreage for wilderness. We do not understand how BLM can propose many of the proposals violate the planning criteria set out in Chapter 2 of the BLM Manual. The same proposed corridors have significant negative impacts on riparian habitat, sagebrush, peregrine falcons and eagles, summer deer, raven and visually sensitive areas.

peregrine falcons and eagles, summer deer range and

3

4-90

ISSUE 10: WOODLAND PRODUCTS. We support the Resource Protection

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 may have been no livestock identification conflicts. The large Stags and other ungulates are being managed by the same people who are managing development. AMPs on all lands will help resolve resource conflicts and poor range conditions. The work done in riparian areas in this RA is excellent. We only hope on the

Indirectly, this chapter does document the majority of resource problems in the Walls 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 vigorously 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

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 same. I am sure that the wild horse consumes more than the cow and calf. Should we receive the same subsidy domestic livestock receive? 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 grasswood 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.

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 planning and analysis purposes is incomprehensible to us. Please explain.

OTHER THRESHOLDS. What possible justification exists for the development would occur in the land? 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 livestock grazing. It appears that the 33% increase proposed for cost the public over \$71/AUM/cow/calf 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 for a 2% increase in AUM's over \$88/AUM. We didn't try to calculate the pay-back time!

It took us many hours to review the BMAP and DEIS. We are left with a very basic question: How can 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

419 Railroad Street
Elko, Nevada 89801
(702) 738-9214

August 18, 1983

Bureau of Land Management
Rod Barrie, District Manager
P.O. Box 631
Elko, NV 89801

Dear Mr. Barrie:

The following comments on the Wells Resource Area BMAP 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 has gone into these comments and they are quite thorough. The record shows that we have the support, each of the points brought up by Mr. McKenzie, we would also like to see a response to these questions, points, and concerns. In addition to Mr. McKenzie's comments we offer the following:

1. In general the BMAP makes proposals for future management direction based on either inadequate or insufficient data. Projected numbers of livestock and wildlife are purely on "professional judgement" and expectations based on so called "study plots and areas necessary to determine the trend in range condition and utilization, there isn't any sound basis to make decisions which allocate forage to the range condition and utilization, there isn't any sound basis to make decisions which allocate forage to 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

Bureau of Land Management
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categories proposed for allotments where the operator wasn't in agreement.

3. No Action Alternative - Economic Impacts Section Pg. 4-15.

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 be realized is incorrect. Unless BLM puts more emphasis in improving the public rangelands through additional seedlings, water developments, etc. the ranching community will continue to deteriorate. Ranchers and business owners will 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 changes 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. 2-13, No. 29. Under the preferred alternative it is explained that "vegetative manipulation that would alter the riparian areas" is not included in the riparian areas. Couldn't seedlings of species not included in the natural plant composition in some areas increase the speed of stabilizing degraded riparian areas?

5. Table 3-2, Pg. 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.

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Rod Harris, District Manager
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Thank you for this opportunity to comment.
Sincerely,

Paul Bottari
Executive Secretary
PB:ah

Taylor, Ltd.
2110 Briarcliff Tower
Austin, Texas 78701
T-1111111

August 16, 1983

Mr. Rodney Harris, District Manager
Bureau of Land Management - Elko District Office
1000 Nevada Street
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 in the area. They seldom come into the area where we are located. There are many deer in the area and 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. The area is very dry and the Pequot or Ruby Mountains which are nearby are much better for deer.
- 3) Until very recently it has been impossible to develop water or fences in the Wood Hills area due to a freeze by the BLM. The area is very dry and the water is very scarce. The Wood Hills Allotment. We would like to have drilled water pits, 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 M-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.

John G. Taylor
John G. Taylor

JGT:G
CC: Nelson Brown

Aug 17, 1983

Dear Mr Harris,
After reviewing the "wild
alternative to the Wood
Environmental statement" &
found it to be in full
agreement and would endorse
it.

Please indicate so.

Thank you,
Kenneth R. Johns

Dear Mr. Harrington

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 HMP.

The Salmon River Unit was converted to a summer grazing operation December 2, 1947, when the Salmon River Canal Company transferred the 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 mild April weather 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 fires, and recessions, our association has maintained a sound record of accomplishments. We have installed water facilities, pasture fences, and seedlings. 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. The only reason for the involvement of the RLM 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 Cattleman's Assoc.

August 17, 1983

CHROMALLOY

MINING & MILLING DIVISION
P.O. BOX 111111, BREA, CA 92621
TEL. 951/861-1000
FAX 951/861-1000

August 17, 1983

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

Attention: RMP/ETS 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

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 Chumailoy 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.

Mr. Rodney Harris
Elko District Manager (cont.)
Page 2

without the plan to sell large tracts of public land, more land is available for exploitation and uncounted mineral recumissions. Mining costs increase significantly due to surface damage payments, securing 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 development is based 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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
HQ/ENR/1X
215 Fourth Street
San Francisco, Ca 94105

AUG 18 1983
Rodney Harris
District Manager
Elko BLM District Office
P.O. Box 100
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 10-2. 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 obligations to disclose 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 to the same address as the DEIS. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray

Charles W. Murray, Jr., Director
Assistant Administrator
for Policy, Technical, and
Resources Management

Enclosures (2)

-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 stream and 15 spring sites. The survey data showed low flow, high temperature and low water flow periods. The results of the survey indicate that surface water quality is adequate for livestock watering and that the quality 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.

The FEIS should elaborate upon this information by comparing the water quality survey results with the state-adopted 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 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."
- 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. The FEIS should clarify whether this will affect the potential wilderness status of these areas.

11

11

-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 BLM 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 159,881-acre area designated by the Ekok RMA and the Humboldt National Forest in the Mary's River - Wild and Scenic River Evaluation dated December 1982. This report determined that the management of the Mary's River Habitat Management Plan would provide protection and enhancement of the stream 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 the presence of 14 of the 25 river miles would be included in 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.

The FEIS should clarify why further Wild and Scenic study could not take place in addition to the River Habitat Management Plan.

57

Vegetation Comments

1. The DEIS does not present adequate information regarding how the proposed grazing management under the RMP will impact the ecological range conditions.

The existing ecological range conditions are estimated in the DEIS to be: excellent - 14; good - 34; fair - 34; and poor - 20%.

42

42

-3-

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 trends 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

10—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.

EP—Environmental Restrictions

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA has requested more information and/or further study of proposed 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. EPA has requested more information and/or further study of proposed 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.

DEMAR H DAHL
B-267
DEATH NEVADA 89823

J. L. M.

Comments By DEMAR H DAHL
DRAFT WELLS RESERVE MINERAL
LEASE AND ENVIRONMENTAL
I support the sixth alternative
which is included.
January 8-67

DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER
3000 SAN ANGELO STREET, SUITE 1115
SAN FRANCISCO, CALIFORNIA 94111

Mr. Rodney Harris, District Manager
Bureau of Land Management
P.O. Box 8311
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 potential 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, and the absence of major highways and other land use 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
W. EDWARD FISCHER
Deputy Regional Civil Engineer

*Timothy J. Blake
August 19, 1993*

*Mr. Rodney Hauke
15th District Manager, BLM
Elko, Nevada*

Mr. Hauke,

Following are comments on the Draft
Wild Horse Area RMP/EIS. I am a
strawholder in the Salmon River Cattlemen
Assn., etc., 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 bad time for land treatment
required by NDOI 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 reliability of the
survey of riparian areas for the entire Reserve
Area. Terrestrial wildlife habitat is in excellent
condition. Presently there exists more winter
horses than can be ridged by present big

②

game numbers. Strict compliance with
Standard Operating Procedure Number 9 (S-3-32)
would be unacceptable. In the past, the
Salmon River Cattlemen Assn., etc., has voluntarily
left strips of sagebrush when we sprayed
on our private range land. Sagebrush
nivaline created whetgrass submerge patch
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.

The Salmon River Cattlemen Assn., etc., 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 agreement
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.
Goodback camp on our private springs and
waterhole 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

when their food comes. But 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,

William H. Schumacher

Don H. Schumacher
1712 Elm St.
Lincoln, Idaho 83341

City of Wells

OFFICE OF CITY CLERK

279 Clover Avenue WELLS, NEVADA 89832 Phone 732-2335

August 17, 1983

MAYOR
-Honorable-
Superintendent of
Public Works
CLOVER VALLEY

COUNCILMAN'S

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

LYNDA BELLER
Bureau of Land Management
and Recreation

LYNDA BELLER
Bureau of Land Management
and Recreation

LYNDA BELLER
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and Recreation

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LYNDA BELLER
Bureau of Land Management
and Recreation

LYNDA BELLER
Bureau of Land Management
 

Sincerely,

Lynda J. Beller
Councilwoman
City of Wells, Nevada

Up to Date - August 24, 1983 - Highway 91 St. and 11th St. - Wells - Harlow Lane - Nevada

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 for the roads. 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 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 (RCAs) implies that all users and/or 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 (RUAs) which is more descriptive of the situation as it exists on the ground and does not imply that the agencies and the user groups are in conflict or misunderstanding about designated Resource Conservation Areas (RCAs).

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

22024 North Turkey Creek Road

Mountain, Colorado 80405

303 697 8766

Mr. Harris, page two

to protect other resource values. " This would provide live 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 2-32

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 that 7,000 acres of riparian habitat will be lost. We cannot believe that 7,000 acres of riparian habitat will be lost. 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.

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 horse program. The program should be managed by the BLM and agreed to by BLM includes random use by wildlife of public and intermingled private lands." An agreement is necessary. BLM as 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 alternatives. 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 live RCA's and the Wells Resource Area as a whole." Time of year restrictions for terrestrial wildlife habitat require identification of significant habitat areas, lawning and calving grounds, strutting grounds, and other critical areas. 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.

Mr. Harris, page four

3. The designation or identification of any transportation and utility corridor, all of which are in the public domain 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 capsuleize 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 "this would be the same as the Resource" or "this would be the same as the Resource" which is already in the document. 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 fatterment. 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
Diamond Ranch
Owens Valley, Diamond Ranch
Deeth, Nevada

DRA:tom
cc: Charles Boyer
cc: Jim McCormick
cc: Bob Garrett

August 10, 1980

Colvin Harris
Elko District Manager
Elko, Nevada 89801

Dear Bob:

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:

Long Range Planning and Stewardship. The proposed RMP is a long term proposition. Over the 60 year span envisioned in the plan, many changes will occur in human impacts and priorities, etc. It is our recommendation that a Stewardship Committee be established to provide long range objectivity, direction, and monitoring. 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 program has demonstrated the need for such a committee. Such a committee can provide that necessary mix of stability and flexibility that is necessary to success of a long range plan.

Overhead Land Wells. The Stewardship plan requires a level of special effort in cooperation with the private land owner. Land exchanges where requested by 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 to the projects such as stub control, riparian systems, etc. The Stewardship plan requires that the Stewardship Committee be created when such treatments are required to follow section lines. This will also provide lower cost and more effective treatments.

In the past where unleased checkboard areas exist the private land owners have been treated as second class citizens. We recommend that this practice be aban-
dined in favor of cooperative management agreements where the livestock owner is

39

59

59

1 charged prorata based on the ratio of private and Federal AUM's actually grazed. Land Disposal. We recommend that the BLM dispose of 30,000 acres. The land needed for community expansion should be allowed under the public lands and administered as 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 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 desires to participate in planning and implementing the improvements and management actions necessary to meet this objective.

A. Short-Term

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 grazing. Develop a program to encourage private investment and provide a more uniform distribution of Federal funds.

Establish monitoring studies on allotments where major change 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.

33

6

Wild Horses. Reduce horse numbers to 1971 levels and monitor future years numbers to maintain the level. Do not reintroduce horses in 1971. Remove horses from private land if so requested. Do not allow horses to graze on 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

Range/Habitat. Include in allotment management plans provisions for improvement of range/habitat. Improvement should be those agreed upon by all users. Fencing should be de-emphasized because it is costly and detrimental to all users.

33

Woodland Practices. Harvesting of pinon 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-C categories. We recommend that there is room for improvement on every allotment. Therefore, we recommend that the livestock operator be allowed to place 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/words from the Draft. 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 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. I think you have upset the local population to a much greater degree. It certainly would not have been a viable alternative here or in any State-ment addressing livestock grazing.

Sincerely,

Thomas W. Ballou
Executive Director

18pt

Ed Sparrow

Comment Letter 54

31.05.83.

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 project will be chosen to allow entry on one regular visit with their motor vehicles even after the area is made wilderness'. It is absurd to demand on one hand that non mechanical means are used for one time spring prevention but

a) A copy of the map. The report maps do not show the Chino Canyon by name, so on this map please mark this and also locate about the trail, the construction site for blinds, nets traps

d) Will the biologist allow the use of W-24 (Map 6 in W-23)?

e) Please send a copy as to the Wilderness Management Policy pertaining to permitted extent of impairment. Both as the region

g) In wild ruses you do not allow a backbreaker to cut down a branch from a living tree but you really permit this done at number of lining branches by biologists.

The reason I dwell in depth on this issue is the principles involved. I consider it a test case for future applications. The scientist who

* Also the distance the biologist are allowed to travel with their (inside the Wildlife Area) on W-25

I think 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 Elk lands in Nevada I note many unauthorized users 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 came up how much wilderness will be left by 1993 in the WEA? Is the scenario designed by the

Harry Melts
Box 668
Greston, B.O. VOB 140

Comment Letter 56

F.S. It's too bad that you don't, we fill to add substantially to your recommended 1,143 acres for the Bad Land WMA by recommending parts of the deleted sections of this WMA. Your inventory reports that areas of 5,414, 11,100 and 15,210 acres are deleted, but were deleted largely because they are "hot" and thus lack "outstanding opportunities for solitude."

base and felsic metal deposits such as those at Tetragram Spring can be mined profitably if they are large and high enough grade. From the descriptions of the bodies mined in the past were probably not profitable, nor would they be today. However, in this tetrane (sic) of abundant carbonate rocks, it is possible there may be a Carlin-type disseminated gold deposit that could be mined very profitably by

4-107

Bureau of Land Management
Nevada State Office
August 19, 1983
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 valleys all around the edges of the mountains. (page 30)

Duval believes the conclusions reached for the Bluebell WSA contained in the Wells Wilderness Technical Report dated April 1983 are not adequate. He has asked that the report be revised and that the 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)

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

Bureau of Land Management
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Page 3

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 area be designated as a non-designated area, and that the non-designation take place.

Should you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,

VANGAS & BARTLETT

Linda A. Bowman
Linda A. Bowman

LAB:dm

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 pensive (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."
- 75 | ". . . It states: "Mineral development would not be adversely impacted because of wilderness designation. 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

Allotment	Public Land (BLM) Acres	Other Federal, State, County Acres	Unfenced Private Acres	Total Acres	Existing Periods of Use	Grazing Preference AIMs	Average 3-5 Yr Licensed Use (AIMs)	% Grazing Preference Used	Category
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
Naverick	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
Odgers	25,319	0	517	25,836	4/16-10/15	1,596	1,190	74.6	I
TOTALS	355,432	1063	5641	362,136		14,436	11,564	80.1	34, 41

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	13,737	0	14,960	28,697	4/10-11/30	1,127	201	17.8	C
TOTALS	293,665	0	127,897	421,562		54,394	45,467	83.6	24, 41, 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
Leproy 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/New. #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	11M, 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

Backhorn	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

Allotment	Public Land (BLM) Acres	Other Federal, State, County Acres	Unfenced Private Acres	Total Acres	Existing Periods of Use	Grazing Preference AIMs	Average 3-5 Yr Licensed Use (AIMs)	% Grazing Preference Used	Category
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					191	191	100.0	M
Bluff Creek	51,180	0	5,192	56,372	8/1 - 9/30	6,445	6,747	104.7	M
Little Goose Creek	67,850	0	3,341	71,191	4/16-11/30	6,268	6,332	101.0	I
TOTALS	191,313	0	19,177	210,490	4/1 -12/31	25,904	23,158	89.4	3I, 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	0	124,337	345,337	4/15-10/31	18,335	18,335	100.0	I
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

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
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

Allotment	Public Land (BLM) Acres	Other Federal, State, County		Unfenced Private Acres	Total Acres	Existing Periods of Use	Grazing Preference AIMs	Average 3-5 Yr Licensed Use (AIMs)	% Grazing Preference Used	Category
		Acres	Acres							
Gordon Creek	808	0	0	1,134	1,942	5/15- 6/14	141	141	100.0	C
Warm Creek	1,537	0	0	0	1,537	3/1 - 6/20 & 11/15-11/30	175	159	90.9	I
Ruby #4	1,415	0	0	144	1,559	4/15- 6/15	314	314	100.0	C
Harrison	8,856	0	0	286	9,142	4/15- 6/25 & 11/1 -12/31	1,019	1,180	115.8	M
Forest	2,633	0	0	402	3,035	5/1 -10/31	316	105	33.2	C
Ruby #1	418	0	0	0	418	5/1 - 5/31	115	174	151.3	M
South Ruby	2,068	682	0	425	3,175	5/16- 7/31	196	80	40.8	C
Ruby #2	826	0	0	0	826	4/20- 9/19	237	237	100.0	M
Curtis Springs	37,434	0	0	880	38,314	11/1 - 3/31	1,841	690*	—	M
Moor Summit	9,605	0	0	8,718	18,323	3/1 -10/15	291	358	123.0	M
Tobar	18,542	0	0	15,814	34,356	4/1 - 2/28	1,717	778	45.3	C
Snow Water Lake	18,647	0	0	231	18,878	5/1 -11/13	1,160	1,165	100.4	M
Ruby #5	16,791	0	0	820	17,611	5/1 - 9/15	1,677	1,690	100.8	M
Smiley	5,497	0	0	6,872	12,369	4/16- 9/30	492	492	100.0	M
Ruby #7	12,444	0	0	517	12,961	5/16- 9/15	1,103	1,153	104.5	M
Hylton	2,449	0	0	1,744	4,193	4/15- 7/15	763	1,008	132.1	M
Wood Hills	40,103	0	0	31,354	71,457	4/1 -11/30	958	145	15.1	M
Glover Creek	2,185	422	0	22	2,629	5/1 -11/15	342	342	100.0	M
Big Meadows	14,559	0	0	117	14,676	5/1 -11/30	1,155	979	84.8	M
Ruby #6	16,042	0	0	222	16,264	5/1 -11/30	1,629	1,345	82.6	M
Ruby #8	28,900	0	0	164	29,064	4/15- 9/30	1,967	1,806	91.8	I
Mayhew Creek	1,032	0	0	0	1,032	5/1 - 5/30	156	127	81.4	C
Kelly Field	194	0	0	92	286	5/1 - 5/30	27	27	100.0	C
Bennett Field	1,164	0	0	1,634	2,798	5/15- 9/15	180	154	85.6	C
Overland Creek	265	0	0	78	343	6/15- 8/31	39	15	38.5	C
Ruby #3	4,683	0	0	389	5,072	4/16- 8/15	611	611	100.0	M
TOTALS	249,097	1,104	0	72,059	322,260		18,621	15,275	82.0	15M, 2I, 9C
GRAND TOTALS (WELLS RA)	4,143,588	17,581	0	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.

Source: Bureau of Land Management 1982f.

TABLE A-2

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

RCA	Big Game Use Area	% within RCA	Season	# of Months	Deer	Antelope	Bighorn***	Elk	Alm Demand****
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	DW-1	100	1/01-12/31	12	200 (200)				600
	DS-4	100	3/01-11/30	9	450 (300)				1000
	DW-3	85	1/01-12/31	12	200 (100)				500
	DW-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
	(KINGSLEY'S)								300
	DS-5	78	4/01-11/30	8	150 (100)				50
	AY-1	29	1/01-12/31	12		20 (20)			700
	AY-2	68	1/01-12/31	12		190 (40)			250
	AY-3	100	1/01-12/31	12		100 (50)			250
	AY-4	100	1/01-12/31	12		100 (25)			30
	AY-5	33	1/01-12/31	12		10 (5)			375
	EX-1	85	1/01-12/31	12				30 (40)	250
	BSY-4	100	11/01- 3/31	5			200 (0)	60 (55)	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

RCA	Big Game Use Area	% within RCA	Season	# of Months	Deer	Antelope	Bighorn**	Elk	AIM Demand
Mary's River	DX-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
	AX-1	55	1/01-12/31	12		40 (40)			100
	AS-3	13	4/01-10/31	7		60 (60)		10 (0)	80
	PIBW-1	5	11/01- 3/31	5			10 (0)		40
	BSM-1	15	11/01- 3/31	5					10
TOTAL									
O'Neil/Salmon Falls	AS-1	100	4/01-10/31	7	3900 (2000)	100 (100)	10 (0)	10 (0)	7380
	AS-2	100	4/01-10/31	7		125 (25)			175
	AS-3	47	4/01-10/31	7		150 (30)			200
	AW-1	57	11/01- 3/31	5		200 (50)			300
	AW-3	100	11/01- 3/31	5		150 (30)			150
	DX-1	100	1/01-12/31	12	100 (70)	150 (30)			150
	DS-1	44	4/01-10/31	7	2100 (1100)				300
	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
	DX-3	100	11/01- 3/31	5	2300 (1500)				2800
	DX-4	100	11/01- 3/31	5	3200 (2000)				4000
	DX-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
	BSV-1	100	1/01-12/31	12			90 (0)		200
	BSM-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</u> <u>Use Area</u>	<u>%</u> <u>within</u> <u>RCA</u>	<u>Season</u>	<u># of</u> <u>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)				250
TOTAL					2695 (1080)				4100
Pilot/Orittenden	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
	BST-5	14	1/01-12/31	12			20 (0)		50
					1750 (750)		20 (0)	200 (70)	3125
TOTAL									
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					80
	AS-3	40	4/01-10/31	7				35 (10)	180 (70)
	AS-4	100	4/01-10/31	7				50 (20)	250
	AW-1	43	11/01- 3/31	7				100 (40)	70
	AW-2	100	11/01- 3/31	7				50 (20)	150
									70
TOTAL					1090 (570)			415 (160)	2540

TABLE A-2 (Continued)

REASONABLE AND EXISTING () NUMBERS FOR WILDLIFE

RCA	Big Game Use Area	% within RCA	Season	# of		Antelope	Bighorn***	Elk	AIM Demand
				Months	Deer				
Ruby/Wood Hills	D4-4	100	12/01- 4/30	5	725 (475)				900
	DSP-1	100	4/15- 5/15	1	3000 (2100)				750
	D4-9	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 & Tsukamoto 1979.

**** - AIM 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*</u> <u>Production</u>	<u>3-5 Yr.</u> <u>Average</u> <u>Use</u>	<u>No</u> <u>Action</u>	<u>Resource</u> <u>Production</u>	<u>Midrange</u>	<u>Resource</u> <u>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
Stompy	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

Allotment Name	Preference	Estimated* Production	3-5 Yr. Average	No	Resource	Midrange	Resource	Preferred
			Use	Action	Production		Protection	
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 AIMS
BY ALTERNATIVE

GOOSE CREEK RCA

Allotment Name	Preference	Estimated* Production	3-5 Yr. Average Use	No Action	Resource Production	Midrange	Resource Protection	Preferred
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

Allotment Name	Preference	Estimated* Production	3-5 Yr.	No Action	Resource Production	Midrange	Resource Protection	Preference
			Average Use					
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

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

Deferred -

1. Fall (8/1-10/10)

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

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/CRETTENIEN 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

ALLOTMENT	RESOURCE PRODUCTION			MIDRANGE			RESOURCE PROTECTION			PREFERRED		
	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY	SDG.	BURN	SPRAY
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	232,000	10,500		30,000	23,500	1500				37,500	23,500	1500
ALTERNATIVE												

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
				Total Value	Value/ Cow
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
			Total Value	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
				<u>Total Value</u>	<u>Value/Cow</u>
Cash Costs:					
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
			Total	Value/	
			Value	Cow	
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.

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