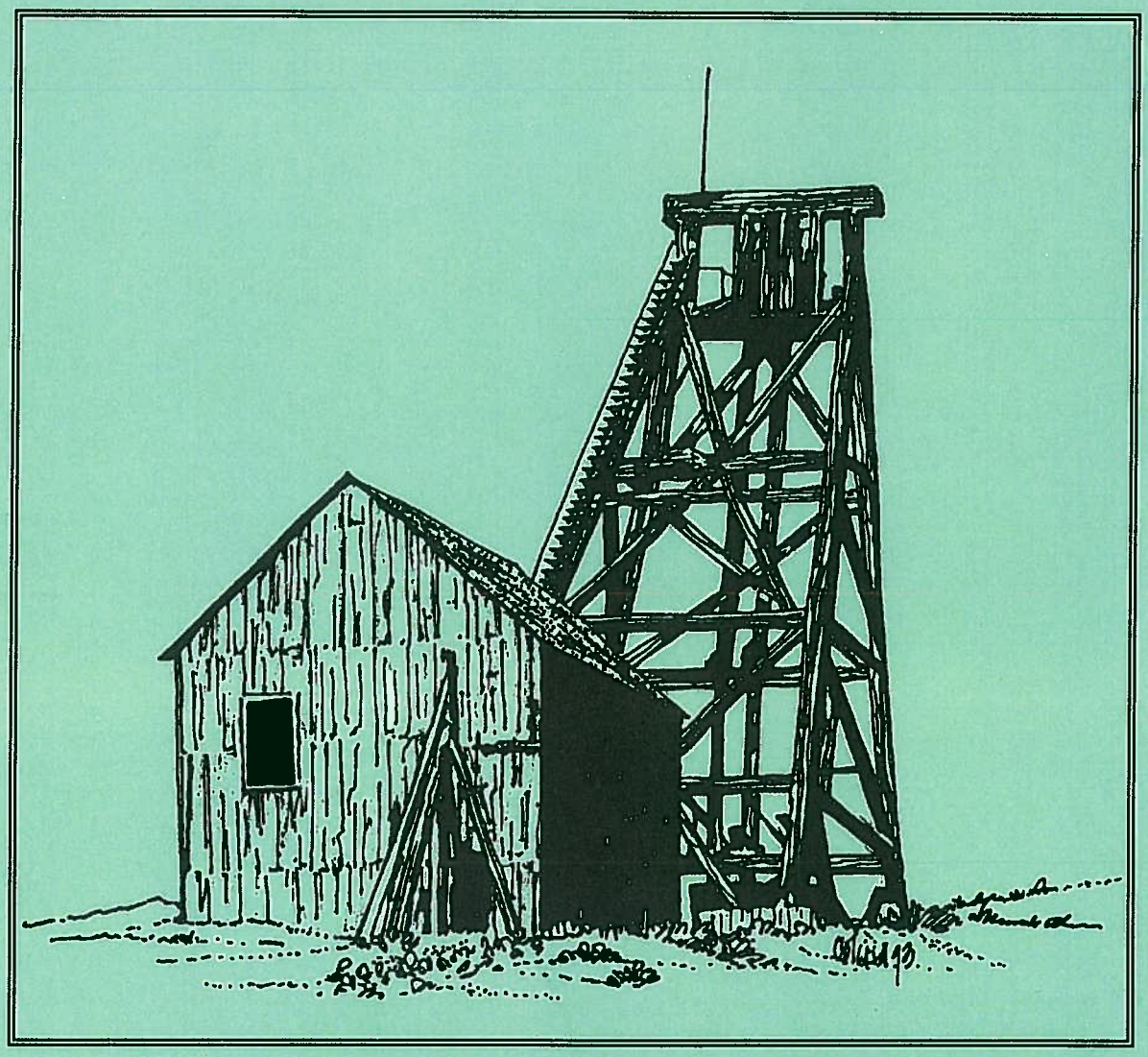
United States Department of Interior
Bureau of Land Management

Battle Mountain District
Tonopah Resource Area, Tonopah, NV

October 1994

PROPOSED

Tonopah Resource Management Plan and Final Environmental Impact Statement



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Nevada State Office
850 Harvard Way
P.O. Box 12000
Reno, Nevada 89520-0006

TAKE PRIDE IN AMERICA

IN REPLY REFER TO

1610 (TON)
(NV930.1)
(NV065)

September 30, 1994

Dear Reader:

Enclosed for your review is the Proposed Tonopah Resource Management Plan (RMP) and Final Environmental Impact Statement (FEIS). This Proposed RMP outlines the various determinations (decisions) for management of renewable and non-renewable resources on approximately 6.1 million acres of public land in portions of Nye and Esmeralda Counties, Nevada. It is also available for a 30 day protest period.

This Proposed RMP and FEIS has been printed in accordance with the National Environmental Policy Act of 1969 and the Federal Land Policy and Management Act of 1976. This Proposed Plan is the Preferred Alternative carried forward from the *Draft Tonopah Resource Management Plan*, released in June, 1993 and as modified by public comment. This document contains a summary of the determinations and resulting impacts, an overview of the planning process and planning issues, the Proposed Plan, written and verbal comments received during public review of the Draft Plan, and responses to the substantive public issues raised during the review.

The Proposed RMP may be protested by any person who participated in the planning process, and who has an interest which is or may be adversely affected by the approval of the Proposed Plan. A protest may raise only those issues which were submitted for the record during the planning process (see 43 Code of Federal Regulations § 1610.5-2). Protests must be filed with the Director (760), Bureau of Land Management, Division of Planning and Environmental Coordination (406 LS), 1849 C Street NW, Washington D.C. 20240.

All protests must be written and must be postmarked on or before **November 21, 1994** and shall contain the following information:

- The name, mailing address, telephone number, and interest of the person filing the protest.
- A statement of the issue or issues being protested.
- A statement of the part or parts of the document being protested.
- A copy of all documents addressing the issue or issues previously submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the record.
- A concise statement explaining precisely why the Bureau of Land Management Nevada State Director's decision is wrong.

Upon resolution of any protests, an Approved Plan and Record of Decision will be issued. The Approved Plan/Record of Decision will be mailed to all individuals who participated in this planning process and all other interested publics upon their request.

Sincerely,

Ronald B. Wenker

Ronald B. Wenker
Acting State Director, Nevada

COVER SHEET

PROPOSED TONOPAH RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

Lead Agency:	U.S. Department of the Interior Bureau of Land Management
Project Location:	Nye and Esmeralda Counties, Nevada
For Further Information Contact:	Ted Angle, Tonopah Area Manager Telephone (702)482-7800

Abstract: The Tonopah Resource Management Plan and Final Environmental Impact Statement provides a comprehensive framework for managing public lands administered by the Tonopah Resource Area, Battle Mountain District, Bureau of Land Management.

The preparation of this document was coordinated with numerous individuals, Federal and State agencies, special interest groups, and County governments.

Date Proposed Plan Issued:	October 21, 1994
Protests, if any, are to be filed with:	Director (760) Bureau of Land Management Division of Planning and Environmental Coordination (406 LS) 1849 C Street, NW Washington, D.C. 20240
Date Comments must be Postmarked:	November 21, 1994

Responsible Official for Proposed Plan:

Ronald B. Wenker

Ronald B. Wenker
Acting State Director, Nevada

September 30, 1994
Date

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SUMMARY

The Proposed Tonopah Resource Management Plan and Environmental Impact Statement (RMP/EIS) provides a comprehensive framework for managing public lands administered by the Tonopah Resource Area, Bureau of Land Management (BLM). The RMP replaces the Tonopah Management Framework Plan (1981) and the Esmeralda-Southern Nye RMP (1986), and will guide management for the next 10-20 years. Preparation of this RMP/EIS was guided by BLM planning system regulations issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA), and Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act of 1969 (NEPA).

Located in central Nevada in Nye and Esmeralda Counties, the Tonopah Resource Area encompasses 6.1 million acres of public land and about 165,000 acres of private land. Significant resources and program emphases include locatable minerals, livestock grazing, wild horses and burros, realty, cultural resources and wildlife.

The Tonopah RMP focuses on resolving six major issues identified early in the planning process through public involvement with other federal, state, and local agencies. These issues are: ***Wild Horses and Burros*** (determine what intensity of management should be implemented to ensure a thriving natural ecological balance); ***Special Management Areas*** (determine if lands should be given special management to protect high resource values); ***Off-highway Use*** (determine if lands should be limited or closed); ***Management of Released Wilderness Study Areas*** (determine what objectives to establish for WSAs released by Congress for non-wilderness); ***Utility Corridors*** (determine lands for preferred routes for utility corridors and to minimize conflicts); and ***Locatable and Fluid Minerals*** (determine lands for closure to leasing or location of minerals, and lands for special considerations).

In addition to planning issues, BLM planning regulations require RMP decisions regarding Special Recreation Management Areas, livestock grazing, cultural resources, firewood harvesting, riparian habitat, special status species, mineral materials, and non-energy minerals.

Four alternative management scenarios were analyzed in the Draft RMP/EIS released for public review in June, 1993. These alternatives were: 1) ***Alternative 1*** (No action - continuation of management under existing planning guidance); ***Alternative 2*** (management with emphasis on private economic development and diversity while protecting sensitive resources); ***Alternative 3*** (management with emphasis on private economic development and diversity while preserving and enhancing environmental systems); ***Alternative 4*** (Preferred - management with emphasis on development of renewable and non-renewable resources while ensuring preservation and enhancement of fragile and unique resources). Written comments were received from 93 individuals, interest groups, other Federal agencies, and county and State government.

The Proposed RMP/Final EIS focuses on proposed management. It was developed after analyzing public comments on the Draft RMP/EIS and includes changes to improve clarity, and to correct weaknesses in the Draft. Many changes were made in response to public comment.

Determinations by resource category for each alternative and the Proposed Plan are summarized in Table S A. Impacts are summarized in Table S B. Complete descriptions of the determinations and impacts associated with the four alternatives are presented in the *Draft Tonopah Resource Management Plan and Environmental Impact Statement*.

TABLE S A
SUMMARY OF DETERMINATIONS BY ALTERNATIVES AND PROPOSED PLAN

Table S A provides a summary of major determinations for each of the four alternatives presented in the *Draft Tonopah Resource Management Plan and Environmental Impact Statement* released in June, 1993, and this Proposed Resource Management Plan/Final EIS. A complete presentation of determinations for each resource is provided in the Chapter 2 of the Draft RMP and Chapter 2 of this Proposed RMP.

RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	PROPOSED
Watershed	Vegetation manipulation and water control facilities to reduce erosion in various watersheds.	Watershed management concerns incorporated into activity plans.	Watershed management concerns incorporated into activity plans.	Watershed management concerns incorporated into activity plans.	Watershed management concerns incorporated into activity plans.
Vegetation	Provide for physiological needs of key forage plant species.	Provide for physiological needs of key forage plant species.	Manage vegetation for desired plant communities.	Manage vegetation for desired plant communities.	Manage vegetation for desired plant communities.
Visual Resource Management	Class I; 400 acres Class II; 686,500 acres Class III; 1,235,000 acres Class IV; 1,510,400 acres Unidentified; 2,658,801 acres	Class I; 0 acres Class II; 2,560 acres Class III; 133,000 acres Class IV; 5,955,541 acres	Class I; 0 acres Class II; 597,000 acres Class III; 90,000 acres Class IV; 5,404,101 acres	Class I; 0 acres Class II; 469,170 acres Class III; 218,000 acres Class IV; 5,403,931 acres	Class I; 0 acres Class II; 469,170 acres Class III; 218,000 acres Class IV; 5,403,931 acres
Fish and Wildlife Habitat	Manage to maintain or increase to reasonable numbers of wildlife. Mineral leasing closed on 23,160 ac. Seasonal restrictions on 28,760 ac. Animal damage control directed at predator populations. Livestock excluded on 11,362 ac. Reintroduce or augment bighorn into potential habitat.	Manage big game habitat for good or better condition. Seasonal restrictions on 54,860 ac. Animal damage control directed at predator populations. Livestock excluded on 11,362 ac. Reintroduce or augment bighorn into potential habitat.	Manage big game habitat in good or better condition. No mineral leasing on 21,880 ac. No incompatible uses on 23,320 ac. Seasonal restrictions on 52,400 ac. Withdraw 1440 ac. No new communication sites and limit vehicles to existing roads and trails on 324,000 acres. Improve existing antelope habitat, augment populations and develop water. Animal damage control targets offending animal. Livestock excluded on 11,362 ac. Reintroduce or augment bighorn into potential habitat.	Manage big game habitat in good or better condition. Seasonal restrictions on 72,400 ac. No new roads to communication sites and limit vehicles to existing roads and trails on 324,000 ac. No incompatible uses and withdrawal on 1440 ac. Maintain antelope habitat in good or better condition, augment populations and develop water. Animal damage control targets offending animal. Livestock excluded from 11,362 ac. Reintroduce or augment bighorn into potential habitat.	Manage big game habitat in good or better condition. Seasonal restrictions on 72,400 ac. No new roads to communication sites and limit vehicles to existing roads and trails on 324,000 ac. No incompatible uses and withdrawal on 1440 ac. Maintain antelope habitat in good or better condition, augment populations and develop water. Animal damage control targets offending animal. Livestock excluded from 11,362 ac. Reintroduce or augment bighorn into potential habitat.

TABLE S A
SUMMARY OF DETERMINATIONS BY ALTERNATIVES AND PROPOSED PLAN
(Continued)

Special Status Species	NSO on 80 ac. Limit OHV events to existing roads, trails and washes on 55 ac.	NSO on 80 ac. Limit OHV events to existing roads and trails on 490 ac.	NSO on 80 ac with no incompatible land uses. Designate 15,470 ac ACEC, NSO on 3,720 ac, and withdraw 15,470 ac. Designate 490 ac ACEC with NSO and withdrawal. Limit vehicles to existing roads and trails on 70,600 ac.	NSO on 80 ac with no incompatible land uses. Designate 15,470 ac as ACEC, reduce withdrawal to 3,040 ac, and withdraw additional 440 ac. Designate 490 ac as ACEC with NSO and withdrawal, livestock and burros excluded. Limit vehicles to existing roads and trails on 70,600 ac.	NSO on 80 ac with no incompatible land uses. Designate 15,470 ac as ACEC, reduce withdrawal to 3,040 ac, and withdraw additional 440 ac. Designate 490 ac as ACEC with NSO and withdrawal, livestock and burros excluded. Limit vehicles to existing roads and trails on 70,600 ac.
Riparian Habitat	Establish and maintain streamside vegetation and bank stability on 13 mi of riparian.	Improve bank stability and cover to 70% on 13 mi of stream. Livestock managed through improved grazing practices.	Manage for 70% bank stability and cover (or proper functioning condition) on 32.8 mi of stream. On 9.4 mi of trout stream acquire minimum water flows, close to vehicle use a 300 ft wide strip on each side, but allow vehicle use on existing roads and trails.	Manage for 70% bank stability and cover (or proper functioning condition) on 32.8 mi of stream. On 9.4 mi of trout stream acquire minimum water flows, close to vehicle use a 300 ft wide strip on each side, but allow vehicle use on existing roads and trails.	Manage for proper functioning condition on 32.8 mi of steam. On 9.4 mi of trout stream acquire minimum water flows, close to vehicle use a 300 ft wide strip on each side, but allow vehicle use on existing roads and trails.

TABLE S A
SUMMARY OF DETERMINATIONS BY ALTERNATIVES AND PROPOSED PLAN
(Continued)

Forestry and Vegetation Products	Palmetto, Palmetto Wash and Silver Peak are greenwood harvest areas. Deadwood harvest on all operable woodland acreage. Non-commercial Joshua tree harvest on 1,823 acres; Goldfield area closed. Christmas tree cutting in Tonopah MFP area, and Mohawk Mine and Magruder Mt. area of Esmeralda-Southern Nye RMP area. No commercial harvest of Christmas trees is authorized. Collection of common desert plants authorized on 880 acres.	Authorize 1,000 cords/yr greenwood in designated areas. Authorize additional 500 cords/yr if Kawich, Rawhide and Silver Peak WSAs released. Establish new cutting areas. Close Baxter Springs area. Commercial greenwood harvest allowed in designated areas. Deadwood harvest on all accessible acreage. Commercial harvest of Joshua trees from Magruder Mt harvest area, non-commercial harvest on 231,000 acres. Authorize to 1,000 Joshua trees/yr until sustained yield determined. Authorize to 1,000 Christmas trees/yr. Collection of common desert plants permitted.	Authorize 1,000 cords/yr greenwood in designated areas, non-commercial only. No greenwood harvest in areas where OHV use closed or restricted to existing roads and trails. Establish new cutting areas. Close Baxter Springs area. Authorize harvest of 600 Joshua trees/yr until sustained yield is determined, no commercial harvest or harvest in areas visible from Hwy 95 near Goldfield. Authorize non-commercial harvest of 1,000 Christmas trees/yr. Collection of common desert plants seeds permitted.	Authorize 1,000 cords/yr greenwood in designated areas, commercial or non-commercial. Deadwood harvest on all accessible acreage. Establish new cutting areas. Close Baxter Springs area. Authorize harvest of 600 Joshua trees/yr until sustained yield determined, commercial harvest only incidental to salvage operations, no harvest in areas visible from Hwy 95 near Goldfield. Non-commercial harvest of 1,000 Christmas trees/yr. Collection of common desert plants and seeds permitted.	Authorize commercial and non-commercial harvest of 1,000 greenwood cords/yr in designated areas. Deadwood harvest on all accessible acreage. Authorize harvest of 100 Joshua trees/year until sustained yield determined, no harvest in areas visible from Hwy 95 near Goldfield, commercial harvest only incidental to salvage operations. Non-commercial harvest of 1,000 Christmas trees/yr in all areas outside WSA's. Collection of common desert plants and seeds permitted.
Livestock Grazing Management	Livestock excluded on 10,372 ac. Manage for 25 Category "I", 3 Category "M" and 6 Category "C" allotments.	Livestock excluded on 10,372 ac. Manage for 22 Category "I", 3 Category "M" and 9 Category "C" allotments.	Livestock excluded from 34,982 ac. Manage for 22 Category "I", 3 Category "M" and 9 Category "C" allotments.	Livestock excluded from 23,607 ac. Manage for 22 Category "I", 3 Category "M" and 9 Category "C" allotments.	Livestock excluded from 13,761 ac. Manage for 22 Category "I", 3 Category "M" and 9 Category "C" allotments.
Wild Horse and Burro Management	Manage 17 HMAs maintain a thriving natural ecological balance.	Excess horses and burros removed to a level from which it will take 5 years to again reach AML. Delete Monitor HMA.	Excess horses and burros removed to a level from which it will take 3 years to again reach AML. Delete Monitor HMA. Vehicles limited to existing roads and trails in HMAs. No land disposal within HMAs.	Excess horses and burros removed to a level from which it will take 3 years to again reach AML. Delete Monitor HMA. Vehicles limited to existing roads and trails in HMAs. Land disposal HMAs if no adverse impact.	Excess horses and burros will be removed to a level from which it will take 3 years to again reach AML. Delete Monitor HMA.

TABLE S A
SUMMARY OF DETERMINATIONS BY ALTERNATIVES AND PROPOSED PLAN
(Continued)

Cultural Resources	Close 140 ac to mineral leasing and 4 ac to mineral entry. Close Gravel Bar road.	Limit vehicles to existing roads and trails on 12,400 ac. On additional 8,480 ac limit vehicles to existing roads and trails, no land disposal, no mineral material sales. Maintain closure of Gravel Bar road.	Close 90 ac to mineral leasing. Withdraw 80 ac and limit vehicles to existing roads and trails. Designate 22,020 ac as ACECs with NSO and withdraw from mineral entry. Maintain closure of Gravel Bar road.	NSO on 90 ac. Withdraw 80 ac and limit vehicles to existing roads and trails. Designate 821 acres as ACECs with NSO and withdraw. Maintain closure of Gravel Bar road.	NSO on 90 ac. Withdraw 80 ac and limit vehicles to existing roads and trails. Designate 821 acres as ACECs with NSO and withdraw. Designate 1,185 ac as ACECs with NSO and withdraw 886 ac. Maintain closure of Gravel Bar road.
Paleontological Resources	Update Class I survey.	Update Class I survey.	Update Class I survey.	Update Class I survey.	Update Class I survey.
Lands and Rights-of-Way	Discretionary disposal of 50,082 ac including 9,042 ac for agricultural entry.	Discretionary disposal of 363,000 ac including 32,154 ac for agricultural entry.	Discretionary disposal of 40,662 ac including 9,042 for agricultural entry. Acquire 1,935 acres if feasible. 50,400 ac included in right-of-way avoidance areas. No disposal in HMAs. Rights-of-way allowed if compatible with values on 660,870 ac, excluded on 48,080 ac. No new communications sites.	Discretionary disposal of 297,000 ac including 28,314 ac for agriculture entry. Acquire 1,680 acres if feasible. Rights-of-way allowed if compatible with values on 168,641 ac. No new roads for communication sites on 324,000 ac. No communication sites authorized on Lone Mountain.	Discretionary disposal of 299,140 ac including 32,154 ac for agricultural entry. Acquire 1,200 acres if feasible. Rights-of-way allowed if compatible with values on 148,845 ac. No new roads for communication sites on 324,000 ac. No communication sites authorized on Lone Mountain.
Areas of Critical Environmental Concern (ACECs)	No ACECs designated.	The following ACECs designated: Lunar Crater 2,560 acres Lone Mountain 14,400 acres	The following ACECs designated: Lunar Crater 39,680 acres Timber Mountain 7,040 acres Amargosa-Oasis 490 acres Cane Man Hill 680 acres Lone Mountain 14,400 acres Railroad Valley 15,470 acres Rhyolite 460 acres Stormy Abel 12,320 acres Trap Springs 8,480 acres Tybo-McIntyre 80 acres	The following ACECs designated: Lunar Crater 39,680 acres Amargosa-Oasis 490 acres Cane Man Hill 680 acres Lone Mountain 14,400 acres Railroad Valley 15,470 acres Rhyolite 61 acres Tybo-McIntyre 80 acres	The following ACECs designated: Lunar Crater 39,680 acres Amargosa-Oasis 490 acres Cane Man Hill 680 acres Lone Mountain 14,400 acres Railroad Valley 15,470 acres Rhyolite 425 acres Tybo-McIntyre 80 acres

TABLE S A
SUMMARY OF DETERMINATIONS BY ALTERNATIVES AND PROPOSED PLAN
(Continued)

Recreation	Vehicles unrestricted on 84% of Resource Area. Gravel Bar Road closed.	Vehicles unrestricted on 90% of Resource Area. Gravel Bar Road closed. Designate 4 SRMAs.	Vehicles unrestricted on 36% of Resource Area. Gravel Bar Road closed. Primitive and semi-primitive areas closed. Designate 7 SRMAs.	Vehicles unrestricted on 79% of Resource Area. Gravel Bar Road closed. Primitive and semi-primitive areas closed. Designate 7 SRMAs.	Vehicles unrestricted on 77% of Resource Area. Gravel Bar Road closed. Vehicles limited to existing roads and trails in primitive and semi-primitive non-motorized and semi-primitive motorized areas. Designate 7 SRMAs.
Wilderness	WSAs released by Congress returned to multiple use.	WSAs released by Congress returned to multiple use.	WSAs released by Congress returned to multiple use.	WSAs released by Congress returned to multiple use.	WSAs released by Congress returned to multiple use.
Fluid Minerals	5,397,602 ac open to fluid mineral leasing, 662,779 ac closed, 3,960 ac with NSO, and 26,760 ac seasonal NSO.	5,425,022 ac open to fluid mineral leasing, 607,799 ac closed, 2,720 ac NSO, and 55,560 ac seasonal NSO.	4,823,466 ac open to fluid mineral leasing, 1,059,235 ac closed, 158,000 ac NSO, and 50,400 ac seasonal NSO.	5,380,501 ac open to fluid mineral leasing, 604,535 ac closed, 3,264 ac NSO, and 72,400 ac seasonal NSO.	5,360,477 ac open to fluid mineral leasing, 607,799 ac closed, 50,425 ac NSO, and 72,400 ac seasonal NSO.
Locatable Minerals	6,057,106 ac open to mineral entry, 21,139 ac withdrawn, and 12,856 ac closed.	6,045,134 ac open to mineral entry, 11,993 ac withdrawn, and 33,974 ac closed.	5,533,099 ac open to mineral entry, 547,139 ac withdrawn, and 10,863 closed.	6,022,605 ac open to mineral entry, 38,380 ac withdrawn, and 30,116 ac closed.	6,020,948 ac open to mineral entry, 35,718 ac withdrawn, and 34,435 ac closed.
Mineral Materials	6,065,901 ac open to disposal of mineral materials, and 25,200 ac closed.	6,026,317 ac open to disposal of mineral materials, 9,224 ac closed, and 55,560 ac open with seasonal restrictions.	5,428,001 ac open to disposal of mineral materials, 612,700 ac closed, and 50,000 ac open with seasonal restrictions.	5,985,036 ac open to disposal of mineral materials, 57,065 ac closed, and 49,000 ac open with seasonal restrictions.	5,968,177 ac open to disposal of mineral materials, 50,524 ac closed, and 72,400 ac open with seasonal restrictions.
Non-Energy Minerals	5,486,566 ac open to leasing, 604,535 ac closed.	5,425,022 ac open to leasing, 610,519 ac closed, and 55,560 ac open with seasonal restrictions.	4,823,466 ac open to leasing, 1,217,235 ac closed, 50,400 ac open with seasonal restrictions.	5,380,501 ac open to leasing, 661,600 ac closed, and 49,000 ac open with seasonal restrictions.	5,358,817 ac open to leasing, 659,884 ac closed, and 72,400 ac open with seasonal restrictions.
Fire Management	Contain fires within 100 ac 90% of time. Life/property fires kept to 5 Ac 87% of time.	Contain fires within 100 ac 90% of time. Life/property fires kept to 1 Ac 100% of time. Habitat resources fires kept to 5 ac.	Zone 1 fires aggressively initial attacked. Zone 2 fires allowed to burn within prescription. Life/property fires kept to 1 ac 100% of time. Habitat resources fires kept minimal.	Zone 1 fires contained within 10 ac. Zone 2 fires allowed within prescription. Life/property fires kept to 1 ac 100% of time. Habitat resource fires kept minimal.	Zone 1 fires contained to 100 ac 90% of time. Life/property fires kept to 5 ac 87% of time. Habitat resource fires kept minimal. Zone 2 fires allowed within prescription.

TABLE S B
SUMMARY OF IMPACTS BY ALTERNATIVES

Table S B provides a summary of major impacts to resources each of the four alternatives presented in the *Draft Tonopah Resource Management Plan and Environmental Impact Statement* released in June, 1993, and this Proposed Resource Management Plan (RMP)/Final Environmental Impact Statement (FEIS). A complete presentation of impacts for each resource is provided in Chapter 4 of the Draft RMP/EIS and Chapter 4 of this Proposed RMP/FEIS.

RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	PROPOSED
Air Resources	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Watershed	Reduced erosion and sedimentation on 13.5 mi of stream.	Reduced erosion and sedimentation on 13.5 mi of stream.	Reduced sedimentation on 32.8 mi of stream.	Reduced sedimentation on 32.8 mi of stream.	Reduced sedimentation on 32.8 mi of stream.
Vegetation	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Fish and Wildlife Habitat	Animal damage control targets non-offending predators. Improved or maintained conditions on 13 miles of stream. Sage grouse adversely impacted by season-long livestock and wild horse/burro grazing. Long term negative impacts occur from land disposal. Adverse impacts to bighorn result from land use activities and road construction. Reduced impacts from mineral leasing by closures of 23,160 ac, NSO stipulations on 3,960 ac and seasonal restrictions on 28,760 ac.	Animal damage control targets non-offending predators. Improved or maintained conditions on 13 miles of stream. Sage grouse adversely impacted by season-long livestock and wild horse/burro grazing. Long term negative impacts from land disposal. Adverse impacts to bighorn from land uses and road construction. Reduced impacts from seasonal NSO on 51,290 ac and withdrawal on 3,120 ac.	Specific predator control benefit non-offending animals. Improved or maintained conditions on 32.8 mi. of stream. Sage grouse benefit from improved grazing management. Long term negative impacts from land disposal. Adverse impacts from land uses and road construction mitigated by seasonal restrictions on 50,400 ac, closure of additional 23,320 ac. Bighorn benefit by closure of 324,000 ac to new communication sites, closure of 23,320 ac to OHV events, seasonal restrictions on 52,920 ac, closure of primitive or semi-primitive non-motorized areas to vehicles, and withdrawal of 1440 ac. Trout benefit from limiting OHV to existing roads and trails along 9.4 mi of stream.	Specific predator control benefit non-offending animals. Improved or maintained conditions on 32.8 mi of stream. Sage grouse benefit from improved grazing management. Long term negative impacts from land disposal. Adverse impacts from land uses and road construction mitigated by seasonal restrictions on disturbing activities on 72,400 ac. Bighorn benefit by closure to new communication sites on 324,000 ac, seasonal restrictions on 72,400 ac, closure of primitive or semi-primitive non-motorized areas to vehicles, semi-primitive motorized areas closed to OHV events, withdrawal of 1440 ac. Trout benefit from limiting OHV to existing roads and trails along 9.4 mi of stream.	Specific predator control benefit non-offending animals. Improved or maintained conditions on 32.8 mi of stream. Sage grouse benefit from grazing management. Long term negative impacts from land disposal. Adverse impacts from land uses and road construction reduced seasonal restrictions on 72,400 ac. Bighorn benefit by closure of 324,000 ac to new communication sites, seasonal restrictions on 72,400 ac, limiting vehicles to existing roads and trails in primitive, semi-primitive non-motorized and semi-primitive motorized areas, and 1,600 ac closed to OHV events, and 1440 ac withdrawal.

TABLE S B
SUMMARY OF IMPACTS BY ALTERNATIVES (Continued)

RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	PROPOSED
Fish and Wildlife Habitat (Continued)			Adverse impacts from mineral development reduced by seasonal restrictions on 50,400 ac, closure to mineral leasing of 21,880 ac and NSO on 3,960 ac, and right-of-way avoidance areas.	Adverse impacts from mineral development reduced by seasonal restrictions on 72,400 ac, withdrawal of 3,480 ac, and seasonal NSO on 23,160 ac.	Trout benefit from limiting OHV to existing roads and trails. Adverse impacts from mineral development reduced by seasonal restrictions on 72,400 ac, and withdrawal of 3,480 ac, and seasonal NSO on 23,160 ac.
Special Status Species	Adverse impact from disposal of 10,781 ac. Adverse impacts from mineral leasing mitigated by NSO on 80 ac.	Adverse impact from disposal of 30,000 ac. Benefits from OHV restricted to existing roads on 490 ac. Adverse impacts from mineral leasing mitigated by NSO on 80 ac.	Adverse impact from disposal of 10,300 ac. Benefits from OHV restricted to existing roads and trails on 71,090 ac. Benefits from 490 ac ACEC, withdrawal, and livestock and burro exclusion. Adverse impacts from mineral leasing mitigated by NSO on 3,480 ac.	Adverse impact from disposal of 30,000 ac. Benefit from OHV restricted to existing roads and trails on 71,090 ac. Benefits from 490 ac ACEC, withdrawal, and livestock and burro exclusion. Adverse impacts mineral leasing mitigated by NSO on 3,480 ac.	Adverse impact from disposal of 30,000 ac. Benefit from OHV restricted to existing roads and trails on 71,090 ac. Benefits from 490 ac ACEC, withdrawal, and livestock and burro exclusion. Adverse impacts mineral leasing mitigated by NSO on 3,480 ac.
Riparian Habitat	Improvement of 5.5 mi of riparian through livestock exclusion. Most springs continue to be degraded. Adverse impact by disposal of 8 mi of stream. Limiting vehicles to existing roads and trails benefits 4,150 ac. Benefit from NSO on 3,720 ac and withdrawal of 14,710 ac.	Benefits from livestock exclusion on 2,235 ac. Spring developments benefit riparian. Limiting vehicles to existing roads and trails benefits 4,150 ac. Benefit from NSO on 3,720 ac and withdrawal of 4,154 ac.	Benefits from livestock exclusion on 2,235 ac. Spring developments benefit riparian. Limiting vehicles to existing roads and trails benefits 4,150 ac. Benefits from NSO on 3,720 ac, and withdrawal of 4,154 ac, and 490 ac ACEC. Vehicle closures and mineral withdrawal protects 8.5 miles of stream and 800 acres of riparian.	Benefits from livestock exclusion on 2,235 ac. Spring developments benefit riparian. Limiting vehicles to existing roads and trails benefits 4,150 ac. Benefits from NSO on 3,720 ac, and withdrawal of 4,154 ac, and 490 ac ACEC. Vehicle closures and mineral withdrawal protects 9.4 mi of stream and 800 acres of riparian. Benefits from NSO on 3,720 ac and withdrawal 4,154 ac.	Benefits from livestock exclusion on 2,235 ac. Spring developments benefit riparian. Limiting vehicles to existing roads and trails benefits 4,150 ac. Benefits from NSO on 3,720 ac, and withdrawal of 4,154 ac, and 490 ac ACEC. Vehicle closures and mineral withdrawal protects 9.4 mi of stream and 800 acres of riparian. Benefits from NSO on 3,480 ac and withdrawal 4,154 ac.

TABLE S B
SUMMARY OF IMPACTS BY ALTERNATIVES (Continued)

Forestry and Vegetation Products	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Livestock Grazing Management	No major impacts.	Disposal of 363,000 ac eliminates Francisco Allotment and ½ of Smoky Allotment.	No major impacts.	Disposal of 297,000 ac eliminates Francisco Allotment and ½ of Smoky Allotment.	Disposal of 297,000 ac eliminates Francisco Allotment and ½ of Smoky Allotment.
Wild Horses and Burro Management	Adverse impacts from disposal of 4,680 ac in HMAs.	Adverse impacts from disposal of 66,000 ac in HMAs.	Adverse impact from burro exclusion on 490 ac. Horses and burros benefit from retaining lands in HMAs, limiting vehicles to roads and trails in HMAs.	Adverse impact from burro exclusion on 490 ac. Adverse impacts from disposal of 66,000 ac in HMAs.	Adverse impact from burro exclusion on 490 ac. Adverse impacts from disposal of 66,000 ac in HMAs.
Cultural Resources	Disposal of 59,082 ac adversely impacts estimated 1,075 sites. Withdrawal of 21,139 ac protects 499 sites. Closure of 25,200 acres to mineral materials sales protects 608 sites.	Disposal of 363,000 ac adversely impacts estimated 6,509 sites. Closure to mineral leasing and NSO on 5960 ac protects estimated sites. Withdrawal of 11,993 ac protects estimated 246 sites. Closure of 5,960 ac to mineral materials sales protects estimated 144 sites.	Disposal of 40,662 ac adversely impacts estimated 730 sites. Closure to mineral leasing and NSO on 612,700 ac protects estimated 20,809 sites. Withdrawal of 47,139 ac protects estimated 11,971 sites. Closure of 612,700 acres to mineral materials sales and non-energy leasing protects estimated 14,786 sites.	Disposal of 297,000 ac adversely impacts estimated 5,342 sites. Closure to mineral leasing and NSO on 57,041 ac protects estimated 1,938 sites. Withdrawal of 40,068 ac protects estimated 874 sites. Closure of 57,041 acres to mineral materials sales and non-energy leasing protects estimated 1,337 sites.	Disposal of 299,140 ac adversely impacts estimated 5,380 sites. Withdrawal of 52,670 ac protects estimated 1,040 sites. Closure of 50,524 ac to mineral materials sales protects estimated 1,220 sites. Closure of 55,349 ac to non-energy mineral leasing protects estimated 1,336 sites.

TABLE S B
SUMMARY OF IMPACTS BY ALTERNATIVES (Continued)

Lands and Rights-of-Way	No major impacts.	Discretionary disposal of 363,000 ac provides flexibility for community expansion and agriculture development.	Discretionary disposal of 40,662 ac limits community expansion and agricultural development. Right-of-way facilities relocated or modified on 597,000 ac. Rights-of-way avoided on 711,270 ac. No disposal in HMAs limits ability for community expansion and agriculture development. Prohibiting new communication sites results in overcrowding at existing sites.	Discretionary disposal of 297,000 ac provides flexibility for community expansion and agriculture development. Ground access for new communication sites on 324,000 ac prohibited.	Discretionary disposal of 299,140 ac provides for flexibility for community expansion and agriculture development. Ground access for new communication sites on 324,000 ac prohibited. Prohibiting communication site on Lone Mountain results in overcrowding at other sites.
Areas of Critical Environmental Concern (ACECs)	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Recreation	OHV use adversely impacted by restriction to existing roads and trails in 10% of Resource Area.	Designation of 4 SRMAs increase recreation opportunity. OHV use adversely impacted by restriction to existing roads and trails in 10% of Resource Area.	OHV use adversely impacted by closure or restriction to existing roads and trails in 64% of Resource Area. Routes for competitive events limited around Goldfield. ACECs, SRMAs enhance recreation opportunities except OHVs.	OHV use adversely impacted by closure or restriction to existing roads and trails in 21% of Resource Area. Routes for competitive events limited around Goldfield. ACECs, SRMAs enhance recreation opportunities except OHVs.	OHV use adversely impacted by restriction to existing roads and trails in 23% of Resource Area. Routes for competitive events limited around Goldfield. ACECs, SRMAs enhance recreation opportunities except OHVs.
Wilderness	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Fluid Minerals	Closure of 23,160 ac precludes leasing and prevents drilling of 14 wells. NSO on 3,960 ac requires directional drilling. Seasonal NSO on 26,760 ac causes scheduling problems.	Seasonal NSO on 34,520 ac causes scheduling problems. NSO on 80 ac requires directional drilling. Removal of NSO restrictions at Lunar Crater ACEC opens an additional 27,520 ac to leasing.	Closure of 21,880 ac precludes leasing. Seasonal NSO on 50,400 ac causes scheduling problems. NSO on 3,720 ac requires directional drilling. NSO on 39,680 ac requires directional drilling. Vehicle closure of 429,490 ac of primitive and semi-primitive non-motorized areas precludes drilling of 25 oil wells and 5 geothermal wells.	NSO on 43,400 ac requires directional drilling. Limiting vehicles to existing roads and trails in primitive and semi-primitive non-motorized, and semi-primitive motorized areas impacts drilling of 25 wells.	Seasonal NSO on 72,400 ac causes scheduling problems. NSO on 50,425 ac requires directional drilling. Limiting vehicles to existing roads and trails, unless new access was approved, in primitive, semi-primitive non-motorized, and semi-primitive motorized areas impacts drilling of 25 wells.

TABLE S B
SUMMARY OF IMPACTS BY ALTERNATIVES (Continued)

Locatable Minerals	No major impacts.	No major impacts.	5 Notices converted to Plans of Operation on 490 ac. Designation of ACECs requires conversion of 18 Notices to Plans of Operation annually. Vehicle closure of 430,290 ac limits exploration and Plans of Operation required. Vehicle closure and withdrawals in primitive and semi-primitive areas results in a 15% reduction in mineral activity.	5 Notices converted to Plans of Operation. Designation of ACECs converts 4 Notices to Plans of Operations yearly. Vehicle closure of 430,290 ac limits exploration and Plans of Operation required. Vehicle closure and withdrawals in primitive and semi-primitive areas results in a 15% reduction in mineral activity.	5 Notices converted to Plans of Operation. Designation of ACECs converts 4 Notices to Plans of Operations yearly. Limiting vehicles to existing roads and trails in primitive, semi-primitive non-motorized, and semi-primitive motorized areas requires approval for construction of new access roads.
Mineral Materials	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Non-Energy Minerals	No major impacts.	No major impacts.	Three prospecting permit applications and one brine-type mine not developed.	One brine-type mine not developed.	One brine-type mine developed.
Fire Management	No major impacts.	No major impacts.	No major impacts.	No major impacts.	No major impacts.
Economic Conditions	Land disposals result in loss of 3600 AUMs and net ranch income of $19,000.	Land disposals result in loss of 14,500 AUMs and net ranch income of $76,125.	Land disposals result in loss of 2,800 AUMs and net ranch income of $14,700.	Land disposals result in loss of 14,500 AUMs and net ranch income of $76,125.	Land disposals result in loss of 14,500 AUMs and net ranch income of $76,125.

CHAPTER 1

INTRODUCTION

PURPOSE AND NEED

The purpose of the *Tonopah Resource Management Plan* (RMP) is to provide the Bureau of Land Management (BLM) direction to manage its natural resources in the Tonopah Resource Area.

This Proposed Resource Management Plan/Final Environmental Impact Statement (PRMP/FEIS) is prepared in accordance with the Federal Land Policy and Management Act, National Environmental Policy Act, the Council on Environmental Quality regulations (40 CFR 1500), and BLM's planning regulations (43 CFR 1600).

The need for a new Plan became evident as a result of a monitoring evaluation conducted in 1989 of the *Tonopah Management Framework Plan* (MFP) (1981) and the *Esmeralda-Southern Nye RMP* (1986). The conclusion of the monitoring is summarized as follows:

Management of the Resource Area is currently guided by two existing land use plans: the *Tonopah MFP* and the *Esmeralda-Southern Nye RMP*. Consolidated, these two plans will comprise a single, multiple-use, comprehensive document capable of providing guidance for making sound decisions for the variety of land uses encompassed within the Resource Area. Combining the two planning areas provides for compatible decisions and continuity of managerial direction throughout the Resource Area.

During evaluation of the *Tonopah MFP* it became evident that a combination of expanding resource development and changes in management direction had rendered the document inadequate for long-term management guidance of many resources, in particular, minerals, realty, and woodland products. A review of the *Esmeralda-Southern Nye RMP* reflected a similar situation.

Moreover, a Bureau mandate to amend land use plans for fluid minerals indicated a need to prepare an RMP covering the entire Resource Area.

GENERAL LOCATION AND GEOGRAPHY

The Resource Area is located within Nye County and Esmeralda County, Nevada. The boundary of the planning area is the same as the Resource Area boundary (See Maps 1 and 2).

The planning area totals approximately 6,091,101 acres of public lands administered by the BLM.

The Resource Area is typical of the Great Basin geographical province. It has north-south trending mountain ranges separated by wide internally drained basins. The vegetation varies between the northern cold desert, the Mojave Desert, and the environmental ecotype between the two areas. Elevations range between 3,200 feet in the south to 9,561 feet in the northeast.

RELATIONSHIP TO BLM POLICIES, PLANS, AND PROGRAMS

This planning effort is in conformance with *Bureau Manual 1620, Supplemental Program Guidance* which identifies the program-specific determinations that are usually made during resource management planning.

There are four existing environmental impact statements (EISs) covering actions in the Resource Area.

1. The *Tonopah Livestock Grazing EIS* was released in 1981. This document

covers the Tonopah MFP. The first *Rangeland Program Summary* (RPS) was issued in February, 1983. A rangeland monitoring program has been implemented and use adjustments have been proposed based on monitoring data and guidance provided in the Tonopah Management Framework Plan. The on-going monitoring and evaluation program continues to provide adequate managerial guidance. Therefore the Tonopah RMP/EIS does not address the allocation of forage beyond that which currently exists.

2. The *Esmeralda-Southern Nye RMP/EIS* was released in November, 1984 and the *Record of Decision (ROD)* was issued in October, 1986. The *Esmeralda-Southern Nye RPS* was issued in September, 1987 initiating a monitoring and evaluation program which provides adequate managerial guidance for the livestock grazing program.

3. The *Tonopah Wilderness Recommendations Final EIS* was released in 1987. The *Nevada State-wide Wilderness Report* contains recommendations regarding management of wilderness on 483,050 acres of public land in northern Nye county. These recommendations to Congress are not analyzed in this RMP/EIS.

4. The *Esmeralda-Southern Nye Wilderness Final EIS* was released in 1987. The *Nevada State-wide Wilderness Report* contains wilderness recommendations on 189,675 acres of public land in southern Nye and Esmeralda Counties. These recommendations to Congress are not analyzed in this RMP/EIS.

RELATIONSHIP TO BLM AND OTHER POLICIES, PLANS, AND PROGRAMS

The Resource Area borders four BLM districts (Carson City, Las Vegas, Ely, and California Desert), as well as the Shoshone-Eureka Resource Area of the Battle Mountain District. Other federal lands within the planning area include three National Forests (Toiyabe, Humboldt, and Inyo), as well as Death Valley National Monument. This document has been coordinated with existing land-use plans on adjoining areas to ensure consistency to the extent possible.

The Draft RMP was developed involving members of the Public, particularly in both Nye and Esmeralda Counties. It has been coordinated with the existing plans of both counties. Where conflicting direction involving the management of public lands occurs between this plan and those of each respective county, this RMP will comply with the laws and statutes enacted by Congress to protect the interests of the citizens of the United States.

PLANNING PROCESS OVERVIEW

The resource management planning process is described in detail in BLM planning regulations 43 CFR 1600 and 40 CFR 1500. The Notice of Intent to prepare the Tonopah RMP/EIS and a notice of scoping period for the public to participate in the identification of planning issues, review of planning criteria, and formulation of alternatives for the Tonopah RMP was published in the Federal Register/Volume 55, Number 29/Monday, February 12, 1990. The planning process involves the following nine basic steps:

Step 1: Identification of Issues:

Planning issues are concerns or controversies about existing and potential land and resource allocation such as levels of resource use, production and protection, and related management practices. Based on public comment during the scoping process in March, 1990, six Issues were identified for the Tonopah RMP/EIS:

1. Determine what intensity of management should be implemented in Wild Horse and Burro Herd Management Areas to ensure that there is a thriving natural ecological balance

consistent with other resource values.

2. Determine if any lands should be given special management consideration in order to protect high resource values.

3. Determine if any lands should be limited or closed to the use of off-highway vehicles.

4. Determine what management objectives should be established for those wilderness study areas released by Congress for non-wilderness, multiple-use purposes.

5. Determine which lands within the Resource Area should be identified as preferred routes for utility corridor locations to minimize conflicts with other resource values.

6. Determine if any lands should be closed to the leasing or location of minerals, and what terms, conditions, or other special considerations should apply in order to prevent unnecessary or undue degradation of the public land, on those lands which are not closed.

Step 2: Development of Planning Criteria:

Planning criteria establish constraints and guides for planning purposes. They state what will, or will not, be done during the planning process. Based on Bureau guidelines and on public comments received during the scoping process in March, 1990, the following planning criteria will be used in the development of the Tonopah RMP/EIS:

1. All decisions from previous land-use plans which represent valid existing management are included in the Tonopah RMP/EIS.

2. The RMP/EIS does not address the allocation of forage beyond the determinations given in planning documents in force in 1991. The current monitoring, evaluation, and adjustment program continues to provide adequate managerial guidance.

3. Management of Wilderness Study Areas (WSAs) will continue under the *Interim Management Policy for Lands Under Wilderness Review*. Should all or part of any WSA be released by Congress from wilderness study, resource management would come under the scope of this Tonopah RMP/EIS. Those areas designated by Congress as Wilderness will be managed in accordance with the Wilderness Act and the specific enabling legislation requirements. A Wilderness Management Plan detailing management objectives and actions for all resources will be prepared for each area after designation.

4. Give priority to the designation of areas of critical environmental concern (ACEC).

5. Rely on the existing inventory and studies of the public lands, their resources, and other values.

6. To the extent possible, coordinate land-use inventory, planning, and management programs of other Federal agencies and State and local governments.

7. Prepare reasonably foreseeable development scenarios based on existing levels of mineral development and at least one alternative addressing a higher level of mineral development. A scenario of lower mineral development than that which currently exists will not be developed.

8. Consider the management prescription on adjoining lands in order to minimize inconsistent management, especially in regard to the identification of corridors.

9. The lands covered in the RMP/EIS are the public lands within the boundaries of the Resource Area. Determinations will not be made for lands in adjoining

districts.

10. No specific determinations will be made on coal resources due to the poor quality, marginal occurrence and lack of expressed interest.

In addition to the above planning criteria, the following requirements from BLM Manuals or other regulations, will also be used to guide the development of the RMP/EIS.

1. Use and observe the principles of multiple-use and sustained yield.

2. Use an interdisciplinary approach in order to integrate consideration of physical and biological science and economics.

3. Consider current and potential uses of the public lands.

4. Weigh long-term benefits to the public against short-term benefits.

5. Section 302(b) of FLPMA requires the Secretary of the Interior to manage the public lands to prevent unnecessary or undue degradation of the lands.

6. BLM 1620 Manual, Supplemental Program Guidance, will be used to identify resource condition objectives, land-use allocations, and management direction determinations that will be made in this RMP.

7. Comply with all pertinent public land laws, policies, and directions.

Step 3: Inventory and Data Collection:

This planning effort relies on existing inventories and studies of the public lands from previous planning documents, previous EISs, resource program data, monitoring and evaluation of on-going programs, and data from other governmental agencies and individuals.

Step 4: Analysis of the Management Situation (AMS):

The AMS describes current BLM management direction. It includes a description of environmental factors and data needed to analyze and resolve the identified issues and to make determinations in regard to Supplemental Program Guidance. The AMS provides the analysis of resource capabilities and management opportunities needed to formulate alternatives.

Step 5: Formulation of Alternatives:

Several alternatives have been developed to resolve issues and management concerns, to make determinations in regard to Supplemental Program Guidance, and to address ways in which to avoid or mitigate adverse impacts which were not adequately addressed in previous land-use plans. Current management guidance from existing land-use plans is described in the No Action Alternative.

Step 6: Estimation of Effects of Alternatives:

The potential impacts and changes that would occur to the physical, biological, social, and economic environments by implementing each of the alternatives are analyzed.

Step 7: Selection of the Preferred Alternative

This alternative was generated in order to resolve issues in a balanced manner. It provides for the development of resources, while protecting or enhancing environmental values. It consists of elements from other alternatives which have been modified to best meet the multiple-use demands in the Resource Area.

After the selection of the preferred alternative, the Tonopah Draft RMP/Draft EIS was distributed to the public, including other government agencies and interest groups, for a 90-day comment period.

Step 8: Selection of the Resource Management Plan:

Following completion of the period for public review and comment on the Tonopah Daft RMP/Draft EIS, the Battle Mountain District

Manager recommended a Proposed Plan to the Nevada State Director for approval. The Proposed Plan incorporated relevant and applicable comments received during the review of the Draft RMP/Draft EIS.

The Proposed Resource Management Plan/Final EIS (PRMP/FEIS) is being sent to the Governor of the State of Nevada for a 60-day consistency review, allowing the State to determine whether the PRMP/FEIS is consistent with State and local government plans and policies.

The PRMP/FEIS is filed with the Environmental Protection Agency and a 30-day protest period begins. If no protests are received during this time, the State Director will approve the plan and publish a Record of Decision. Should any part of the plan be protested, the Director will resolve protests to the extent practical, and then approve the plan and publish a Record of Decision.

Step 9: Monitoring and Evaluation:

A monitoring and evaluation schedule and set of standards will be established in order to: 1) track implementation of decisions, 2) help keep the plan current, 3) determine if the objectives for the management of the resources are being met, and 4) assess whether the RMP continues to reflect the best resource management decisions. Periodic reviews will be scheduled at least once every five years.

RELATIONSHIP OF THE PROPOSED PLAN TO LOCAL LAND-USE PLANS

Under Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA), all BLM plans must be consistent, in so far as possible, with resource related plans officially approved or adopted by state and local agencies. The Division of State Lands was directed by the 1983 State Legislature (Senate Bill 40) to "prepare, in cooperation with appropriate state and local agencies and local governments throughout the state, plans or policy statements concerning the use of lands in Nevada which are under federal management." The purpose of the plans is to provide state and locally developed public land management policies to be used by the various federal agencies managing public lands in Nevada. The Esmeralda County Board of Commissioners on April 16, 1985, adopted the Esmeralda County Policy Plan for Public Lands. The Board of Commissioners of Nye County on April 3, 1985, unanimously approved the Nye County Policy Plan for Public Lands. The relationship between the RMP and the Esmeralda County Policy for Public Lands is discussed in Appendix 14. The relationship between the RMP and the Nye County Policy for Public Lands is discussed in Appendix 15.

In 1994, the Nye County Board of Commissioners approved the Nye County Comprehensive Plan. The stated purpose of the Comprehensive Plan is to serve as a guide to the Nye County Board of Commissioners on all matters of growth and development. The public lands portion of the Comprehensive Plan has not been developed. Therefore, no meaningful comparison of the Proposed RMP/EIS and the Comprehensive Plan can be made at this time.

PROTEST PROCEDURES

Any person who participated in the planning process and has an interest that is or may be adversely affected by approval of the Proposed RMP may file a written protest with the Director of the BLM. Protests must be filed within the 30-day period after the Environmental Protection Agency (EPA) publishes a notice of receipt in the Federal Register, of this Proposed RMP Final EIS.

Only those persons or organizations who participated in this planning process leading to this RMP may protest. If BLM records do not indicate that you had any involvement in any stage in the preparation of the Proposed RMP, your protest will be dismissed without further review.

A protesting party may raise only those issues that he or she submitted for the record during the planning process. New issues raised during the protest period should be directed to the Tonopah Area Manager for consideration in plan implementation, as potential plan amendments, or as otherwise appropriate.

The period for filing a plan protest begins when the Environmental Protection Agency Notice of Availability of the final environmental impact statement containing the Proposed RMP or amendment is published in the Federal Register. The protest period extends for 30 days. There is no provision for any extension of time. To be considered "timely", your protest must be postmarked no later than the last day of the protest period. Also, although not a requirement, your protest should be sent by certified mail, return receipt requested. Protests must be filed in writing to:

Director (760)
Bureau of Land Management
Division of Planning and Environmental Coordination
1894 C St. NW (406 LS)
Washington, DC 20240

In order to be considered complete, your protest must contain, at a minimum, the following information:

1. The name, mailing address, telephone number, and interest of the person filing the protest.

2. A statement of the issue or issues being protested.

3. A statement of the part or parts of the Tonopah Resource Management Plan/Final Environmental Impact Statement being protested. To the extent possible, this should be done by reference to specific pages, paragraphs, sections, tables, maps, etc., included in the document.

4. A copy of all documents addressing the issue or issues that you submitted during the planning process or a reference to the date the issue or issues were discussed by you for the record.

5. A concise statement explaining why the BLM State Director's decision is believed to be incorrect. This is a critical part of your protest. Take care to document all relevant facts. As much as possible, reference or cite the planning documents, environmental analysis documents, available planning records (e.g. meeting minutes or summaries, correspondence, etc.). A protest that only expresses disagreement with the Nevada State Director's proposed decision without any data will not be considered.

CHAPTER 2

PROPOSED PLAN AND RANGE OF ALTERNATIVES

INTRODUCTION

The Proposed Resource Management Plan (RMP) described in this chapter was developed by a BLM interdisciplinary planning team. It is based on the preferred alternative in the *Tonopah Draft RMP*, issued in June, 1993, and has been modified through public and internal comment. The Proposed RMP represents a complete plan to guide future management of the public land in the Tonopah Resource Area.

The plan determinations are made up of two elements; existing management that would continue, and new RMP decisions. The number and type of new RMP decisions were identified by reviewing the current management situation, public comments, BLM manual requirements and management direction. These determinations were based on district-wide objectives and specific guidance. The objectives and guidance were developed by reviewing the various values and programs on the district.

Land use actions would be implemented after the State Director approves the RMP Record of Decision (ROD). The plan decisions become final with the issuance of the ROD. Implemented actions include designations of ACECs, utility corridor locations, OHV designations, and VRM management classes. Specific actions for ACECs and OHV designations will be implemented as site-specific management plans are developed and appropriate clearances made.

Some actions cannot be implemented immediately. For example, mineral withdrawal revocations must be approved by the Secretary of Interior. Thus, actions such as these may be recommended in this RMP but would not become valid until approved by the appropriate authority. However, BLM intends to pursue all actions recommended in this Proposed RMP and included in the ROD.

Other actions in the RMP require the completion of further detailed planning and environmental compliance before on-the-ground work can begin. For example, lands identified for disposal could not be disposed of unless they meet RMP objectives and other criteria for disposal.

THE RANGE OF ALTERNATIVES

Four alternatives were considered in detail in the *Draft RMP/EIS*. The alternatives were formulated specifically to respond to the planning issues identified at the beginning of the planning process and to the BLM's program guidance. No single alternative satisfies all of the planning concerns expressed. However, the alternatives addressed the concerns in a variety of ways.

Alternatives were formulated within the following constraints:

All alternatives are legally feasible and technically possible. The alternatives present a balance between the legal requirements to protect, restore, and enhance natural resource values and the need to produce food, fiber, minerals and services.

The *Tonopah Draft RMP* alternatives have been developed to accommodate multiple-use management of resources in Wilderness Study Areas (WSAs). The actions proposed are those that will take place if the WSAs are released from wilderness consideration by Congress. Some of the proposed actions are compatible with the Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP), and can be implemented, while others must await final decisions from Congress.

Should Congress designate wilderness areas, the RMP will be maintained to accommodate these new designations and to modify decisions which conflict with objectives of wilderness management. The management of areas designated as wilderness will be guided by the requirements of the Wilderness Act of 1964, specific enabling legislation, and procedures of the BLM for management of wilderness areas. The management of site-specific wilderness areas will be included in future wilderness management plans. Certain actions are non-discretionary. These include closure to motorized vehicle use (except for valid existing rights and approved nonconforming uses by permit) and withdrawal from mineral entry.

ALTERNATIVES CONSIDERED IN THE DRAFT RMP

The alternatives are in accordance with the discretionary limits established through applicable laws, regulations, and policies. Alternatives were developed to provide management options which address both key issues and management concerns.

ALTERNATIVE 1:

This is the No Action Alternative. Management is performed in a manner which continues the present level and systems of resource use as described in the *Tonopah MFP* and the *Esmeralda-Southern Nye RMP*. These plans contain a full array of multiple resource uses. Where resources and uses were not articulated in those plans, some of the management direction that is assumed for the No Action Alternative was derived by extrapolating from past management actions.

ALTERNATIVE 2:

This alternative provides opportunities for private economic development and economic diversity through the utilization of a wide range of resources. Lands will be made available for expansion and development, while protecting sensitive resource values.

ALTERNATIVE 3:

This alternative provides for private economic development and economic diversity which is constrained by environmental safeguards designed for the preservation and enhancement of environmental systems, and for species diversity.

ALTERNATIVE 4:

This is the preferred alternative. This alternative provides for the development of renewable and non-renewable resources, while ensuring that the preservation and enhancement of fragile and unique resources will occur.

ALTERNATIVES CONSIDERED BUT NOT ANALYZED

Several alternatives were considered in addressing specific issues in the Resource Area. Among these were alternatives which promoted unconstrained production or protection and targeted specific resources. Such alternatives were considered inappropriate because they failed to meet the principles of multiple-use and sustained yield which is one of the planning criteria of the Federal Land Policy and Management Act of 1976.

Alternatives dealing with the allocation of forage and removing livestock from allotments with less than satisfactory range conditions were considered, but eliminated from further study. Current decisions from the *Esmeralda-Southern Nye RMP/EIS*, the *Tonopah MFP* and the *Tonopah Grazing EIS* have adequately analyzed the issue, provide adequate managerial guidance, and allow for changes based upon monitoring and evaluation. Therefore, they have been restated in the Proposed RMP.

An alternative was requested to be considered which would have addressed the Las Vegas Valley Water District's applications for diversion of water from 27 underground sources in the Resource Area. These filings are part of a total of 146 applications initially filed in the Ely District, Las Vegas District, and the

Tonopah Resource Area of the Battle Mountain District. The BLM has protested all the applications in accordance with State water law. As of the date of preparation of this Proposed RMP, no permits were granted on these applications. Because the granting of water rights is controlled by the State of Nevada and BLM has submitted protests on each filing in accordance with State law, and because the BLM has no authority to determine if the water rights are to be granted or not it was determined that dealing with this issue in the RMP would not be proper. Whenever permits are granted and right-of-way applications are received, a detailed environmental documentation of the project will be undertaken.

THE PROPOSED PLAN

WATERSHED

Objective:

To maintain or improve watershed conditions in the Resource Area.

RMP Determinations:

1. Prepare and implement activity plans (Allotment Management Plans, Habitat Management Plans and Herd Management Area Plans) in watersheds where there is a high potential to reduce erosion, and identify site specific resource objectives, rehabilitation techniques, and the designing and placement of improvements such as check dams and seedings. These watersheds are: Oasis Valley, Wagon Johnnie, Hot Creek, Sand Springs, Stone Cabin, Morey, Ione, Monitor, Ralston, Lower Railroad Valley, Reveille, San Antone, Hunts Canyon, Big Smoky, and Lower Hot Creek (see Maps 3 and 4).

VEGETATION

Objective:

To provide for vegetative and ecological diversity.

RMP Determinations:

1. Manage the vegetation resource for desired plant communities (DPC). A general listing of key plant species associated with the DPC is shown in Appendix 1 (these key plant species are identified by basic vegetation type/ecological site of occurrence). Descriptions of specific DPC will be developed by allotment at key areas. Descriptions will be based on information collected at the key area sites, including data on ecological potential. Management of the vegetative resource will provide for the physiological needs of the key forage plant species. Key forage plant species are shown by allotment in Appendix 2.

VISUAL RESOURCE MANAGEMENT

Objective:

To designate VRM classes and manage to maintain existing scenic qualities.

RMP Determinations:

1. Manage the Resource Area for the following VRM classes (see Maps 7 and 8):

Class I Areas:	0 acres
Class II Areas:	469,170 acres
Class III Areas:	218,000 acres
Class IV Areas:	5,403,931 acres

See Appendix 3 for definition of Visual Resource Management Classes.

2. Manage scenic quality along five identified highways as VRM Class III areas (SR 374 between Beatty and Death Valley National Monument, SR 276 between Scotty's Junction and Death Valley National Monument, SR 266 between Lida Junction and the California border, SR 265 between Blair Junction and Silver Peak, and SR 264 between U.S. 6 and the California border).

3. Manage the Lunar Crater ACEC (39,680 acres) and primitive and semi-primitive non-motorized areas (see Appendix 12 for definitions) (429,490 acres) as VRM Class II area.

WILDLIFE HABITAT MANAGEMENT

Objective:

To maintain and enhance wildlife habitat and provide for species diversity.

RMP Determinations:

1. Continue the following management decisions from previous planning:

   a. On 9,127 acres at Toiyabe Bench, livestock grazing would be excluded until the objectives described in the *Toiyabe Bench Deer Winter Range Management Plan* are met. Once the objectives have been met, controlled livestock grazing will be allowed in conformance with the plan to maintain acceptable habitat conditions.

   b. Lockes Meadow, Blue Eagle Pond, Big Well, Chimney Springs, Reynolds Spring and North Spring (a total of 2,317 acres) will continue to be excluded from livestock grazing to achieve riparian objectives, in accordance with the *Railroad Valley HMP*. Use by livestock in these locations may be allowed on a non-renewable basis to achieve objectives identified in the HMP.

   c. The reintroduction or augmentation of bighorn sheep into potential habitat areas in the Hot Creek, Goldfield, Amargosa, Magruder/Palmetto, Monte Cristo, Montezuma, Silver Peak, Sawtooth, Bare Mountain, and Gold Mountain habitat areas will continue to be supported (see Maps 10 and 13).

   d. Rocky Mountain elk will continue to be managed in cooperation with the Nevada Division of Wildlife (NDOW) and the U.S. Forest Service in accordance with the *Monitor Elk Management Plan*. Elk populations will be allowed to increase until allowable use levels are reached as determined through monitoring and evaluation. If overuse of vegetation occurs and elk are determined to be the primary offending animal, reductions will be requested through NDOW.

2. Manage mule deer, antelope, elk, and bighorn sheep habitat for good or better condition.

3. Prepare or revise Habitat Management Plans (HMP) for the entire Resource Area to enhance habitats for game and non-game wildlife species. Priorities are as follows:

   a. Maintain the Railroad Valley Wildlife Management Area HMP.

   b. Revise the Silver Peak HMP.

   c. Prepare HMP's for the following areas: Bullfrog Hills, Fish Lake Valley (White Mountains), Gold Mountain/Stonewall, Grant/Quinn Range, Hot Creek/Squaw Hills, Ione Valley/Royston Hills, Kawich/Reveille,

Magruder/Sylvania/Palmetto, Monte Cristo/Lone Mountain, Montezuma, Pancake Range/Sand Springs, Railroad Valley (except for Wildlife Management Area), Ralston/Monitor Valleys, San Antone/Big Smoky Valley and Stone Cabin/Little Fish Lake Valley.

4. On 28,920 acres of mule deer winter range, restrict activities which might be disturbing to mule deer between January 15 and May 15 (see Maps 34 and 35).

5. On 26,000 acres of sage grouse habitat, restrict activities which might be disturbing to sage grouse between February 15 and May 15 (see Maps 34 and 35).

6. Manage bighorn sheep habitat (324,000 acres) (see Maps 10 and 11) by: prohibiting construction of new roads to communication facilities and limiting vehicle use to existing roads and trails; prohibiting off-highway vehicle events within one-quarter mile of Specie Spring; restricting, between February 1 and May 15, activities in lambing areas which might be disturbing to lambing (17,480 acres); and withdrawing 1,440 acres from mineral entry which are lambing areas at Stonewall Falls and Little Meadows.

7. Maintain antelope habitat in good or better condition. Allow for re-introduction and augmentation of antelope populations and develop additional water sources.

8. Animal damage control will be targeted at the individual offending animal only. There will be no preventative control unless authorized by the BLM authorized officer.

9. Appropriate off-site mitigation will be considered during a plan of operation review for locatable mineral actions when an irretrievable loss of important habitat is unavoidable, or a significant long term adverse impact will occur.

SPECIAL STATUS SPECIES

Objective:

To protect, restore, enhance, and expand habitat of special status species.

RMP Determinations:

1. Manage Non-Intensive Category III desert tortoise habitat (70,600 acres), (see Map 15) by limiting vehicle use to existing roads and trails. In cases in where new road construction is discretionary, no new roads will be constructed in those washes in which there may be an adverse impact on the desert tortoise.

2. Continue to protect the Railroad Valley springfish and its critical habitat at North Spring and Reynolds Spring (80 acres) through management in accordance with the *Railroad Valley Habitat Management Plan*. Fluid mineral leasing is allowed on 80 acres with a no surface occupancy stipulation (see Map 34). No land uses will be authorized which are incompatible with the area's values.

3. Designate the 15,470 acres as the Railroad Valley ACEC to protect riparian areas, wildlife habitat and threatened species habitat (see Map 26; also see Appendix 16 for legal descriptions).

   Management of this area includes: acquisition of non-consumptive appropriative water rights; continued exclusion of livestock from 2,317 acres; a utility corridor through the Blue Eagle portion of the ACEC will be designated below the Grant Range; acquisition of 480 acres of private lands through exchange or purchase at Lockes Ranch, if economically prudent, and if the owner is agreeable; limiting vehicle use to existing roads and trails in the ACEC; establish a Special

Recreation Management Area; allowing fluid mineral leasing with a no surface occupancy stipulation on 3,480 acres; reducing the existing withdrawal to mineral entry from 14,710 acres to 3,040 acres; and withdrawing an additional 440 acres of riparian area at Lockes Pond. (See Appendix 16 for legal descriptions.)

4. Designate the Amargosa-Oasis riparian area, habitat for the Oasis Valley speckled dace and the Amargosa toad, as an ACEC (490 acres) (see Map 27; also see Appendix 16 for legal descriptions). Management of this area includes: exclusion of livestock and wild burros, no land uses will be authorized which are incompatible with the area's values, limitation of vehicle use to existing roads and trails, acquisition of non-consumptive appropriative water rights, allowing mineral leasing with a no surface occupancy stipulation, and withdrawal from mineral entry. If economically prudent and if the owner is agreeable, acquire adjacent private lands (280 acres) (see Appendix 16 for legal descriptions) containing desirable riparian values through exchange or purchase.

5. Habitat for all candidate species (plant and animal) will be managed to maintain or increase current populations of these species. The introduction, reintroduction, or augmentation of candidate, as well as federally listed threatened or endangered species, may be allowed if, in coordination with NDOW and the USFWS, it is deemed appropriate. Such actions will be considered on a case-by-case basis and will be subject to applicable procedures outlined under the SOPs, Environmental Review and Management.

RIPARIAN HABITAT

Objective:

To manage riparian habitats for proper functioning condition (PFC).

RMP Determinations:

1. Manage for proper functioning condition on all 32.8 miles of streams, streamside riparian areas, and all springs, seeps, wet meadows and other riparian areas in the Resource Area (see Maps 14 and 15).

2. Manage for prevention of riparian habitat deterioration on those streams and riparian areas rated as functional.

3. Where streams and riparian areas are rated as functional-at-risk, manage for an improving trend, as determined using techniques described in current BLM Technical References and/or other BLM guidelines. If needed, design and implement management practices to achieve an upward trend within 5 years of issuance of the approved RMP/ROD. If the desired trend does not occur, and livestock and wild horses/burros are the cause, exclude livestock and wild horses/burros.

4. Where streams and riparian areas are rated as non-functional and livestock and wild horses/burros are the cause, modify management and/or exclude livestock and wild horses/burros.

5. Manage for trout habitat on Barley Creek, Barker Creek, Clear Creek, Corcoran Creek, Jefferson Creek, Moores Creek, Mosquito Creek, Perry Aiken Creek, Pine Creek, Silver Peak Pond Creek, and Troy Creek (9.4 miles) (see Table 3 C). Acquire minimum water flows in accordance with State water law to support trout. Limit vehicle use to existing roads along a 300-foot wide strip on each side of the above streams.

6. Acquire 160 acres of private land at Moores Station which include trout habitat, if economically prudent and the

owner is agreeable. (See Appendix 16 for legal descriptions.)

FORESTRY AND VEGETATIVE PRODUCTS

Objective:

To provide vegetation products for consumptive use where compatible with other resource values.

RMP Determinations:

1. Authorize the harvest of woodland products in greenwood cutting areas. Limit authorization to 1,000 cords per year. If Kawich and Silver Peak Wilderness Study Areas (WSAs) are released by Congress, greenwood cutting areas will be established within those areas. Establish new greenwood cutting areas at Bellehelen, Montezuma, Hot Creek Mtns., Squaw Hills, Piper Peak and Kawich and expand cutting areas at Silver Peak, Palmetto and Palmetto Wash (total of 11,850 acres). All newly opened cutting areas will be closed when tree canopy cover is reduced to 10 to 20 percent. Commercial harvest may be allowed in any of these areas.

2. Permit the harvest of pinyon and juniper deadwood only, in all accessible woodland acreage outside WSAs. The removal of dead mahogany, cottonwood or aspen will be prohibited.

3. The harvest of Joshua trees in the area that can be seen from Highway 95 near Goldfield (100,000 acres) would not be allowed. Commercial harvest of Joshua trees will only be allowed for salvage operations incidental to surface disturbance. Until a complete inventory is available to determine the sustained yield and a new level of authorization can be calculated, limit non-commercial authorizations to 100 trees per year.

4. Permit cutting of Christmas trees and limit harvest to 1,000 trees per year in all areas outside WSAs. Allow only non-commercial harvest.

5. Permit the collection of common desert plants and seeds. Creosote bush harvest will only be authorized northwest of State Route 267 in Nye County. No sales of live desert plants will remove more than 10 percent of the existing canopy cover.

LIVESTOCK GRAZING MANAGEMENT

Objective:

To implement the recommendations of the rangeland monitoring and evaluation program to resolve identified resource conflicts and/or concerns in a way which will achieve multiple-use management.

RMP Determinations:

1. Continue the following management practices:

   a. The *Tonopah MFP* and *Tonopah Grazing EIS* along with the *Esmeralda-Southern Nye RMP/EIS* provide the guidance necessary for the livestock grazing program.

   b. The current stocking levels are shown in Appendix 6 for the *Tonopah MFP* and Appendix 7 for the *Esmeralda-Southern Nye RMP*. The current stocking level for each allotment was set in previous land use plans, or has been adjusted based on the evaluation of monitoring data. The future stocking level within each allotment will be adjusted as determined through the evaluation of short-term and long-term monitoring data. In allotments where monitoring data do not distinguish individual use between livestock and wild horses/burros, the stocking level for livestock will be based on a proportion derived from previous planning documents. Allotment boundaries are shown on Maps 16 and 17.

c. Livestock use will continue to be excluded on Lockes Meadow, Blue Eagle Pond, Big Well, Reynolds Spring, North Spring, and Chimney Springs in accordance with HMP objectives (2,235 acres). Livestock use may be allowed in these areas on a non-renewable basis and in a prescribed manner to achieve or maintain the objectives identified in the HMPs. Livestock use on Toiyabe Bench is excluded until the objectives of the *Toiyabe Bench Deer Winter Range Management Plan* are met.

d. On 70,600 acres of Non-Intensive Category III desert tortoise habitat (see Map 15), and in accordance with the August 14, 1991 *Biological Opinion for the Proposed Livestock Program Within Desert Tortoise Habitat in Southern Nevada*, the following terms and conditions have been placed in affected grazing leases:

Livestock use within desert tortoise habitat may occur from March 1 through October 14; forage utilization shall not exceed 40 percent on key perennial grasses, forbs, and shrubs.

Livestock use in desert tortoise habitat may occur from October 15 through February 28; forage utilization shall not exceed 50 percent on key perennial grasses and 45 percent on key shrubs and perennial forbs.

The key forage species within this habitat include as a minimum: Desert Needlegrass (*Stipa speciosa*), Indian Ricegrass (*Oryzopsis hymenoides*), White Burrobrush (*Hymenoclea salsola*) and Winterfat (*Eurotia lanata*).

Should utilization exceed 40 percent on key perennial grasses, forbs, and shrubs during the period of March 1 through October 14; or 50 percent on key perennial grasses and 45 percent on key shrubs and perennial forbs during the period of October 15 through February 28, the lessee shall have ten (10) calendar days in which to remove all livestock from desert tortoise habitat. Utilization within each allotment shall not be averaged either among locations or over time.

All vehicle use in desert tortoise habitat associated with the livestock grazing program shall be restricted to existing roads and trails.

Trash and garbage associated with livestock grazing operations, i.e., branding, roundups, etc., shall be removed from each camp site or work location and disposed of off site in a designated facility. No trash or garbage shall be buried at work locations within desert tortoise habitat.

Use of hay or grains as a feeding supplement shall be prohibited in desert tortoise habitat to avoid the introduction of non-native plant species. Mineral and salt blocks may be authorized in accordance with 43 CFR 4100.

e. Unalloted lands at Columbus Salt Marsh and Emigrant Peak will remain unalloted.

f. The range improvement projects proposed in the *Tonopah Grazing EIS* and *Esmeralda-Southern Nye RMP* would be proposed in the RMP (see Appendix 5).

2. Manage 22 allotments as "I" category, three allotments as "M" category, and nine allotments as "C" category (see Appendix 8).

3. Livestock will be excluded from the Amargosa-Oasis ACEC (490 acres). Livestock use may be allowed in exclusion areas in a prescribed manner to achieve or maintain resource objectives.

WILD HORSES AND BURROS

Objective:

To manage wild horses and burros at levels that will maintain and preserve a natural thriving ecological balance consistent with other resource needs within Herd Management Areas.

RMP Determinations:

1. Continue the following management determinations

   a. Six Herd Management Areas (HMAs) in the *Tonopah MFP* and ten HMAs in the *Esmeralda-Southern Nye RMP* are identified and are listed in Table 2 A. These HMAs are shown on Maps 18 and 19.

   b. The interim herd size or appropriate management level (AML) for each HMA was defined in previous land use plans or has been adjusted based on court decisions or the evaluation of monitoring data (see Table 2 A.) Appendix 10 A and 10 B show interim herd sizes and AMLs by allotment. The future herd size or AML within each HMA will be adjusted as determined through the evaluation of short-term and long-term monitoring data. When the AML is established through monitoring and evaluation, wild horse and burro populations will not be allowed to exceed the AML. The AML will be revised only as a result of monitoring and evaluation and to achieve a thriving natural ecological balance. Once the AML has been set, a single gather plan will be prepared and implemented and will remain in effect until analysis of monitoring information indicates the need for adjustment. In HMAs where monitoring does not distinguish between wild horses/burros and livestock, the interim herd size or AML will be adjusted proportionately with the current stocking level (active preference) for livestock. See Appendix 6 and 7 for allocations between horses/burros and current stocking levels for livestock. Wild horse and burro populations could also be reduced as a result of emergencies (drought, fire, etc.) or conflicts with private landowners. See Appendix 9 for examples of how forage allocation is calculated.

   c. The Monitor HMA identified in the *Tonopah MFP* would be deleted. Horses censused in 1974 were mistakenly identified as wild horses. These horses were actually privately owned. Therefore, an HMA should never have been identified.

   d. Water would be made available in rested pastures for wild horses and burros wherever feasible.

2. Manage wild horse and burro populations to maintain and preserve a natural thriving ecological balance and multiple-use relationship in HMAs (see Maps 18 and 19).

3. Remove excess animals when interim herd size or AML (see Table 2 A) and a thriving natural ecological balance are exceeded. When removals are necessary animals will be reduced to a point which will allow three years of population increase before again reaching the interim herd size or AML.

4. Close a one-fourth mile radius area around Mud Spring to off-highway vehicle events.

5. Apply for appropriative water rights and/or assert public water reserves on water sources as they are identified or as they become available in HMAs.

TABLE 2 A
INTERIM HERD SIZE OR APPROPRIATE MANAGEMENT LEVEL (AML)

Herd Management Area	Interim Herd Size[1]	Appropriate Management Levels[2]
Bullfrog	12 horses and 218 burros	
Dunlap	69 horses	
Fish Lake Valley	62 horses and 12 burros	
Gold Mountain	19 horses	
Goldfield	227 horses and 71 burros	
Hot Creek		41 horses
Little Fish Lake		39 horses
Montezuma	161 horses	
Palmetto	184 horses	
Paymaster/Lone Mountain	48 horses	
Reveille		145-165 horses[3]
Sand Springs		49 horses
Saulsbury	25 horses for 6 months[4]	
Silver Peak	307 horses	
Stone Cabin		364 horses
Stonewall	13 horses and 34 burros	

1 Interim herd size is derived from previous planning documents and is the AML until modified or adjusted by monitoring and evaluation.
2 The AML is the maximum number of wild horses and/or burros to be managed in a herd management area and has been set through monitoring and evaluation or by court order.
3 High and low management levels as directed by 1987 Court Decision (Civil R-85-535 BRT) Fallini vs. Hodel.
4 Wild horses drift onto public lands from the adjacent Monitor Wild Horse Territory administered by the U.S.Forest Service.

FORAGE ALLOCATION

RMP Determinations:

1. Continue the present management determinations:

   a. Current stocking levels for livestock and interim herd sizes for wild horses/burros were set in the *Tonopah MFP* and *Esmeralda-Southern Nye RMP* (see Appendix 6 and 7). These stocking levels and herd sizes would remain as valid existing management unless modified by the monitoring, evaluation, and adjustment process.

   b. Livestock and wild horse/burro use adjustments will be based on short-term and long-term monitoring data.

   Monitoring methods are described in the 1984 *Nevada Rangeland Monitoring Handbook* and other BLM technical references.

   c. Wildlife populations will be allowed to increase. If monitoring data show that wildlife are overusing the vegetative resource the Nevada Division of Wildlife will be requested to control the herd sizes at a threshold level which avoids resource damage.

   d. When monitoring data indicate that additional forage is permanently available and that wildlife objectives have been met, the additional forage may be allocated to livestock and wild horses/burros. Additional forage permanently available will be allocated to livestock and wild horses/burros on a proportional basis as established by the *Tonopah MFP* or the *Esmeralda-*

Southern Nye RMP (see Appendix 6 and 7). Increases in livestock grazing use will be made in accordance with 43 CFR 4100.

e. When monitoring data show that grazing use is causing an unacceptable level or pattern of use, or exceeds the carrying capacity, such use will be reduced. When the offending class of animal can be determined, the numbers of animals in that class will be reduced. If monitoring data do not distinguish which is the offending animal, grazing use will be reduced on a proportional basis, or as adjusted through the monitoring, evaluation and adjustment process. The forage allocations are shown in Appendix 6 and 7. Reductions in livestock grazing use will be made in accordance with 43 CFR 4110.

(For examples of how forage allocations will be calculated see Appendix 9.)

CULTURAL RESOURCES

Objective:

To protect archaeological, historical, paleontological, and socio-cultural resources and manage for information, public values, and conservation.

RMP Determinations:

1. Continue the present management determinations:

a. Manage the Trap Springs-Gravel Bar Complex for information potential by maintaining the existing road closures until the information potential of this complex can be recovered through a comprehensive research and data recovery program.

b. The Berlin Town Site will be managed for conservation and will remain closed to fluid mineral leasing (704 acres). The segregation of the area under the Classification and Multiple Use Act will be terminated (304 acres). The area will be withdrawn from mineral entry.

c. Update the Class I survey for paleontological resources in the following areas: 1) fossiliferous sedimentary rocks and Quaternary alluvium, 2) Ione Valley, 3) Tonopah Flat, and 4) Gabbs Valley. Paleontological resources will be managed to protect specimens and maintain or enhance sites or areas for their scientific and educational values.

2. Classify and manage cultural resources for their information potential, conservation, and public values. See Appendix 13 for a complete description of these management guidelines.

a. Manage for Information Potential:

Rockshelters; Late Pleistocene/Western Pluvial Lakes Tradition Sites; sites on valley bottoms lacking Pleistocene lake features; historic sites lacking clear association with either established mining districts, locally important ranching operations or major transportation routes; and sites on upper and lower bajada slopes. Specific management determinations are as follows:

1) Manage the Stormy-Abel Site Complex (12,320 acres) by prohibiting range improvements or other actions that would increase grazing in the vicinity of Storm, Coyote, and Abel Springs. Limit vehicle use to existing roads and trails until the information potential of this complex can be recovered through a comprehensive research and data recovery program. Once the research program has recovered the available information, the above land use restrictions will be lifted.

2) Manage the Trap Springs-Gravel Bar Complex (8,480 acres) to maximize data recovery and salvage of cultural resources, while allowing for oil and gas production. This will be done by developing and implementing a comprehensive data recovery program; prohibiting gravel sales on the gravel bar (679 acres); continue the closure of the Gravel Bar Road and limiting vehicle use to existing roads and trails in the rest of the area. Once the research program has recovered the available information, the above land use restrictions will be lifted.

b. Manage for Public Values:

Rockshelters; Late Pleistocene/Western Pluvial Lakes Tradition Sites; sites on valley bottoms lacking Pleistocene lake features; historic sites lacking clear association with either established mining districts, locally important ranching operations or major transportation routes; and sites on upper and lower bajada slopes. Specific management determinations are as follows:

1) Fluid mineral leasing will be allowed with a no surface occupancy stipulation at: Jumbled Rock Petroglyphs (10 acres), Moores Station Petroglyphs (40 acres), and Mountain View Arrastra (40 acres) (see Map 33; also see Appendix 16 for legal descriptions).

2) Withdraw from mineral entry: Moores Station Petroglyphs (40 acres), Mountain View Arrastra (40 acres), and Tybo-McIntyre kilns (80 acres) (see Map 24; also see Appendix 16 for legal descriptions).

3) No land uses will be authorized which are incompatible with cultural values and limit vehicle use to existing roads and trails at: Moores Station Petroglyphs (40 acres) and Mountain View Arrastra (40 acres).

4) Designate 425 acres as the Rhyolite ACEC to protect historic structures (see Map 27). Manage historic structures for public uses. Land disposal will not be allowed. No land uses will be authorized which are incompatible with the area's values. Limit vehicle use to existing roads and trails. Provide for signing and barricades to exclude people from unsafe structures. Establish a SRMA. Allow mineral leasing with a no surface occupancy stipulation. Withdraw 126 acres from mineral entry. (See Appendix 16 for legal descriptions.)

5) Designate 80 acres (20 acres around each set of kilns) as the Tybo-McIntyre Charcoal Kilns ACEC to protect historic structures (see Map 26). Manage historical values for conservation and public values. No land uses will be authorized which are incompatible with the area's special values. Improve access roads and limit vehicle use to existing roads and trails. Develop visitor use facilities and establish a SRMA. Allow mineral leasing with a no surface occupancy stipulation. Withdraw from mineral entry. (See Appendix 16 for legal descriptions.)

c. Manage for Conservation:

Rock shelters with datable deposits; stratified sites; late Pleistocene/western pluvial lakes tradition sites; historic sites associated with established mining districts, locally important ranching operations or major transportation routes; and sites containing paleo-environmental data. Specific management determinations are as follows:

1) Designate 680 acres as the Cane Man Hill ACEC to protect prehistoric values (see Map 27). No land uses will be authorized that are incompatible with the area's values. Limit vehicle use to designated roads and trails. Allow mineral leasing with a no surface occupancy stipulation. Withdraw from mineral entry. Manage cultural resources for conservation and information. (See Appendix 16 for legal description.)

3. Prepare a Class I overview of cultural resources for the entire Tonopah Resource Area.

LANDS AND RIGHTS-OF-WAY

Objective:

To make lands available for community expansion and private economic development and to increase the potential for economic diversity.

RMP Determinations:

1. Continue the following management determinations:

   a. Continue to make available 43,760 acres of land for disposal.

   b. A 160 acre parcel of private land at Pritchards Station and a 160 acre parcel of private land at Moores Station are identified for acquisition.

   c. Continue the withdrawal of 6,722 acres: Air Force (619 acres), BLM-Power Site Reserve (17 acres), BLM-Protective-Railroad Valley (3,040 acres), Department of Energy (2,571 acres, Federal Aviation Administration (418 acres), Federal Energy Regulatory Commission (45 acres) and Forest Service Administration (12 acres).

   d. Continue the classification of 10,863 acres as suitable for sale or lease under appropriate authority.

   e. Continue the following management determination: Revoke the Pinyon Joshua Tree Transition Research Natural Area (RNA) designation and open the area to mineral entry (520 acres). The RNA designation has been evaluated as inappropriate because no pinyon trees are known to occur within the designated RNA.

   (Because all natural areas became "instant" Wilderness Study Areas (FLPMA Section 603 (a)), this decision has not been, and cannot be, implemented until a final Congressional wilderness decision is made.)

2. Make available a total of 299,140 acres of public lands for potential disposal (see Maps 20 and 21). This total includes 43,760 acres of the 50,040 acres identified for disposal from previous land-use plan decisions, 32,154 acres of proposed and allowed agricultural entries, and 223,226 additional acres. (See Appendix 16 for legal descriptions.)

3. Retain for the purposes of resource management those public lands previously identified for disposal within the Amargosa-Oasis ACEC, riparian areas along Perry Aiken Creek, Jefferson Creek, and deer winter range along Chiatovich Creek (total of 6,280 acres).

4. If the original entrant or the entrant's assignee fails to "prove up" under the agricultural land laws, lands classified for agricultural entry will be disposed of only under the sale and exchange authorities.

5. Acquire private lands, if economically prudent and if the owner is agreeable, through exchange and/or purchase at Moores Station (160 acres), Pritchards Station (160 acres), Lockes Ranch

(480 acres), Amargosa-Oasis ACEC (280 acres) and Rhyolite ACEC (120 acres) (see Maps 20 and 21). All acquired lands will be managed in accordance with the RMP and activity plans. (See Appendix 16 for legal descriptions.)

6. In right-of-way avoidance areas, rights-of-way and other discretionary lands actions will be granted only if no feasible alternative routes are available. Any such grants, leases, or permits will include appropriate stipulations to protect the area's special values. The following right-of-way avoidance areas will be established (see Maps 22 and 23):

   a. Seasonal Restrictions: on deer winter range between January 15 and May 15 (28,920 acres), on sage grouse habitat between February 1 and May 15 (26,000 acres), and on bighorn sheep habitat between February 1 and May 15 (17,480 acres) for a total of 72,400 acres.

   b. Rights-of-way allowed within the following areas will have to be compatible with the special values of the area: no new roads will be authorized in desert tortoise habitat if there will be an adverse impact to tortoise (70,600 acres), bighorn sheep lambing grounds (1,440 acres), Moores Station Petroglyphs (40 acres), Mountain View Arrastra (40 acres), Lunar Crater ACEC (39,680 acres), Amargosa-Oasis ACEC (490 acres), Cane Man Hill ACEC (680 acres), Lone Mountain ACEC (14,400 acres), Railroad Valley ACEC (15,470 acres), Rhyolite ACEC (425 acres), Tybo-McIntyre Charcoal Kilns ACEC (80 acres), Clayton Valley Sand Dunes SRMA (2,500 acres), and Crescent Sand Dunes SRMA (3,000 acres) for a total of 148,845 acres. (Some areas overlap, affecting total.)

   c. New roads for communication facilities will not be allowed within bighorn sheep habitat (324,000 acres).

   d. Communication sites will not be authorized within the Lone Mountain ACEC.

   e. All other lands within the Resource Area in which there are no unresolvable conflicts with other resource values will be open to consideration for linear or areal rights-of-way, leases, and land use permits.

7. No right-of-way exclusion areas will be established.

8. A total of 35,718 acres will be withdrawn from mineral entry (see Maps 24 and 25). (See Appendix 16 for legal descriptions.)

9. Continue the existing withdrawal of 6,722 acres.

10. Reduce the existing withdrawal of the Railroad Valley Wildlife Management Area from 14,710 acres to 3,040 acres

11. Terminate the withdrawal of the BLM Administrative Site (5 acres) and the Pinyon Joshua Transition Natural Area (520 acres).

12. Withdraw an additional 28,996 acres from mineral entry as follows: bighorn sheep lambing grounds (1,440 acres), Gold Point (60 acres), portions of Lunar Crater ACEC (25,600 acres), Amargosa-Oasis ACEC (490 acres), Cane Man Hill ACEC (680 acres), Rhyolite (126 acres), Tybo-McIntyre ACEC (80 acres), Mountain View Arrastra (40 acres), Moores Station Petroglyphs (40 acres), and Railroad Valley ACEC (440 acres).

13. Terminate all classifications under the Small Tract Act and Classification and Multiple Use Act, and classify an additional 23,752 acres proposed for agricultural entry for a total of 34,435

acres.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECs)

Objective:

To protect sensitive resource values through formal designation and recognition in combination with other resource values.

RMP Determinations:

Legal descriptions of proposed ACECs are shown in Appendix 16. See Appendix 17 for a description of the ACEC determination process followed in this RMP.

1. Designate the Lunar Crater Volcanic Field (39,680 acres) as an ACEC to protect important geological features (see Map 26). No land uses will be authorized which are incompatible with the area's values. Limit vehicle use to existing roads and trails. Establish a Special Recreation Management Area in the ACEC. Allow mineral leasing with a no surface occupancy stipulation. Withdraw 25,600 acres from mineral entry. Conduct validity exams on all Plans of Operations within the ACEC. Close to mineral material disposal.

2. Designate 490 acres as the Amargosa-Oasis ACEC to protect riparian values and the habitats of special status species (see Map 27). Acquire non-consumptive appropriative water rights. Exclude livestock and wild burros from riparian vegetation. No land disposal will be allowed. Acquire adjacent private lands through exchange or purchase. No land uses will be authorized that are not compatible with the area's value. Limit vehicle use to existing roads and trails. Allow mineral leasing with a no surface occupancy stipulation. Withdraw from mineral entry. Close to mineral material disposal.

3. Designate 680 acres as the Cane Man Hill ACEC to protect prehistoric values (see Map 27). No land uses will be authorized that are incompatible with the area's values. Limit vehicle use to designated roads and trails. Allow mineral leasing with a no surface occupancy stipulation. Withdraw from mineral entry. Manage cultural resources for conservation and information. Close to mineral material disposal.

4. Designate 14,400 acres as the Lone Mountain ACEC to protect habitat representative of Nevada's species diversity (see Map 27). No land uses will be authorized which are incompatible with the area's values. No communication sites will be authorized. Limit vehicle use to existing roads and trails.

5. Designate 15,470 acres as the Railroad Valley ACEC to protect riparian areas, wildlife habitats, and threatened species habitat (see Map 26). Acquire non-consumptive appropriative water rights. Continue to exclude livestock from 2,235 acres. No land uses will be authorized which are incompatible with the area's values. A utility corridor through a portion of the ACEC will be designated west of the Grant Range. Acquire 480 acres of private lands through exchange or purchase at Lockes Ranch. Limit vehicle use to existing roads and trails in the ACEC. Establish a Special Recreation Management Area. Allow fluid mineral leasing with a no surface occupancy stipulation on 3,480 acres. Reduce the existing withdrawal to mineral entry from 14,710 acres to 3,040 acres, and withdraw an additional 440 acres of riparian area at Lockes Pond. Close 3,480 acres to mineral material disposal.

6. Designate 425 acres as the Rhyolite ACEC to protect historic structures (see Map 27). Manage historic structures for public uses. Land disposal will not

be allowed. No land uses will be authorized which are incompatible with the area's values. Limit vehicle use to existing roads and trails. Provide for signing and barricades to exclude people from unsafe structures. Establish a Special Recreation Management Area. Allow mineral leasing with a no surface occupancy stipulation. Withdraw 126 acres of the ACEC from mineral entry.

7. Designate 80 acres (20 acres around each set of four kilns) as the Tybo-McIntyre Charcoal Kilns ACEC to protect historic structures (see Map 26). No land uses will be authorized which are incompatible with the area's special values. Improve access roads and limit vehicle use to existing roads and trails. Develop visitor use facilities and establish a SRMA. Allow mineral leasing with a no surface occupancy stipulation. Withdraw the ACEC from mineral entry. Close to mineral material disposal.

RECREATION

Objective:

To ensure protection of important resource values and to allow for off-highway vehicle use.

RMP Determinations:

1. Continue the previous management determination to close the Gravel Bar Road in Railroad Valley to vehicle use.

2. Designate 4,840,811 acres as open to unrestricted vehicle use, 1,250,290 acres as limited (restrictions limiting use to existing roads, trails, and washes, seasonally or by type of user). (see Maps 30 and 31 for OHV Restrictions; also see Appendix 4 for definitions of OHV restrictions and terms).

3. In the following areas vehicles will be limited to existing roads and trails: desert tortoise habitat (70,600 acres); bighorn sheep habitat (324,000 acres); Lunar Crater ACEC (39,680 acres); Amargosa-Oasis ACEC (490 acres); Cane Man Hill ACEC (680 acres); Lone Mountain ACEC (14,400 acres); Railroad Valley ACEC (15,470 acres); Rhyolite ACEC (425 acres); Stormy-Abel Prehistoric District (12,320 acres); Trap Springs-Gravel Bar Prehistoric District (8,840 acres); Tybo-McIntyre ACEC (80 acres); the Sump (1,600 acres); Moores Station Petroglyphs (40 acres); Mountain View Arrastra (40 acres); primitive, semi-primitive non-motorized, semi-primitive motorized areas (894,215 acres) and trout habitat (300 foot wide strip on each side of 9.4 miles of stream). (Some areas overlap, affecting totals.)

4. The following areas will be closed to competitive events: Specie Spring (160 acres), Mud Spring (160 acres), Moores Station Petroglyphs (40 acres), Mountain View Arrastra (40 acres), Lunar Crater ACEC (39,680 acres), Amargosa-Oasis ACEC (490 acres), Cane Man Hill ACEC (680 acres), Lone Mountain ACEC (14,400 acres), Railroad Valley ACEC (15,470 acres), Rhyolite ACEC (425 acres), Tybo-McIntyre ACEC (80 acres), the Sump (1,600 acres), Clayton Valley Sand Dunes (2,500 acres), and Crescent Sand Dunes (3,000 acres).

5. Competitive events will be limited to existing roads and trails in the Joshua tree area viewable from Highway 95 near Goldfield.

6. Competitive events are seasonally restricted on 72,400 acres of wildlife habitat (see Wildlife RMP Determinations).

7. On 26,000 acres of sage grouse habitat, restrict all activities which might be disturbing to sage grouse between February 15 and May 15 (see

Maps 34 and 35).

8. Manage bighorn sheep habitat (324,000 acres) (see Maps 10 and 11) by: limiting vehicle use to existing roads and trails; prohibiting off-highway vehicle events within one-quarter mile of Specie Spring; restricting, between February 1 and May 15, all activities in lambing areas which might be disturbing to lambing (17,480 acres); and prohibiting land uses that are incompatible with bighorn sheep lambing areas at Stonewall Falls and Little Meadows.

9. On 28,920 acres of mule deer winter range, restrict all activities which might be disturbing to mule deer between January 15 and May 1 (see Maps 34 and 35).

Objective:

To manage as Special Recreation Management Areas (SRMA) where the presence of high quality natural resources and current or potential demand warrants intensive use practices.

RMP Determinations:

1. The following areas will be designated as SRMAs: Clayton Valley Sand Dunes (2,500 acres), Crescent Sand Dunes (3,000 acres), Lunar Crater ACEC (39,680 acres), Railroad Valley Wildlife ACEC (15,470 acres), Rhyolite ACEC (425 acres), Tybo-McIntyre ACEC (80 acres), Moores Station (160 acres) (if acquired), and Pritchards Station (160 acres)(if acquired).

   Vehicle use will be limited to existing roads and trails (except on unvegetated sand areas). OHV use on unvegetated sand areas may be allowed provided that such vehicle use is compatible with the areas' values. Fluid mineral leasing will be allowed subject to a no surface occupancy stipulation.

Objective:

To manage as an Extensive Recreation Management Area (ERMA), emphasizing dispersed recreation use, all lands not requiring intensive management of recreational uses.

RMP Determinations:

1. Designate the Tonopah Extensive Recreation Management Area to include the 6,026,570 acres not within a SRMA. Develop minimal facilities necessary to meet the needs of dispersed recreational uses and to protect the environment. Approximately 60 acres will be used in construction of facilities; specific locations are not yet identified.

Objective:

To establish Back Country Byways to facilitate visitation to less-frequented public lands, and to showcase areas of scenic, wildlife, natural, cultural, and recreational interests.

RMP Determinations:

1. Designate the Emigrant Pass, Lunar Crater Volcanic Field, and Morey-Hot Creek Back Country Byways.

Objective:

To provide for a full range of recreation opportunities varying from activities enhanced by or dependent on roads to activities dependent on roadless areas.

RMP Determinations:

1. Manage 90,370 acres for primitive and 339,120 acres for semi-primitive non-motorized recreation opportunity settings (see Maps 28 and 29). These

lands will be managed for Class II VRM. Off-highway vehicle use will be restricted to existing roads and trails.

WILDERNESS

Objective:

All Wilderness Study Areas (WSAs) released by Congress will be returned to multiple-use.

RMP Determinations:

1. WSAs (see Maps 26 and 27) released by Congress for multiple-use purposes will be managed as proposed in other programs. All land use authorizations will be subject to environmental review and stipulations applied on a case by case basis. A total of 90,370 acres will be managed for primitive values, and 245,780 acres will be managed for semi-primitive non-motorized values; these lands will be managed for Class II VRM. Off-highway vehicle use will be restricted to existing roads and trails. No competitive OHV events will be authorized.

2. A total of 268,385 acres will be managed for semi-primitive motorized values. No competitive events will be authorized. Greenwood cutting areas will be established at Kawich, and Piper Peak. All management authorizations will be subject to environmental review and stipulations applied on an individual basis.

3. A total 604,535 acres in WSAs are closed to mineral leasing.

UTILITY CORRIDORS

Objective:

To facilitate the placement of major transportation and utility systems passing through the Resource Area and to minimize conflicts with other resource values.

RMP Determinations:

1. A total of 668 miles of Transportation and Utility corridors (including those carried forward from previous planning) will be designated (see Maps 20 and 21). All primitive areas, all Special Recreation management Areas, and all ACECs, except a portion of the Railroad Valley ACEC west of the Grant Range will be avoided.

FLUID MINERALS

Objective:

To provide the opportunity for fluid mineral exploration and development using appropriate stipulations to allow for the preservation and enhancement of fragile and unique resources.

RMP Determinations:

1. A total of 5,360,477 acres will be open to fluid mineral leasing subject to the terms and conditions of the standard lease form.

2. Close Berlin townsite (704 acres) and Project Faultless (2560 acres) to fluid mineral leasing.

3. Apply seasonal restrictions on fluid mineral leasing activities on 72,400 acres of seasonal wildlife habitat (see Maps 34 and 35) (Some areas overlap, affecting totals.)

4. The following areas totalling 50,425 acres will be open to mineral leasing with a no surface occupancy stipulation: Amargosa-Oasis ACEC (490 acres), a portion of the Railroad Valley ACEC (3,480 acres), Mountain View Arrastra (40 acres), Moores Station Petroglyphs (40 acres), Jumbled Rock Petroglyphs (10 acres), Cane Man Hill ACEC (680 acres), Rhyolite ACEC (425 acres), Tybo-McIntyre Charcoal Kilns ACEC (80 acres), Clayton Valley Sand Dunes

(2,500 acres), Crescent Sand Dunes (3,000 acres), and Lunar Crater ACEC (39,680 acres) (see Appendix 16 for legal descriptions).

5. The determinations made for mineral leasing will also apply to geophysical exploration. Waivers to these determinations will be considered if the identified resource values can be protected.

LOCATABLE MINERALS

Objective:

To provide the opportunity for exploration and development of locatable minerals consistent with the preservation and enhancement of fragile and unique resources in areas identified as open to the operation of the mining laws.

RMP Determinations:

1. A total of 6,028,948 acres will be open to the operation of the mining laws (see Maps 24 and 25).

2. Continue the existing withdrawal of 6,722 acres: Air Force (619 acres), BLM-Power Site Reserve (17 acres), BLM-Protective-Railroad Valley (3,040 acres), Department of Energy (2,571 acres, Federal Aviation Administration (418 acres), Federal Energy Regulatory Commission (45 acres) and Forest Service Administration (12 acres).

3. Reduce the withdrawal of the Railroad Valley Wildlife Management Area from 14,710 acres to 3,040 acres (see Appendix 16 for legal descriptions).

4. Terminate the withdrawal of the BLM Administrative site (5 acres) and the withdrawal of the Pinyon Joshua Transition Natural Area (520 acres).

5. Withdraw an additional 28,996 acres from mineral entry as follows: bighorn sheep lambing grounds (1,440 acres), Gold Point (60 acres), portions of Lunar Crater ACEC (25,600 acres), Amargosa-Oasis ACEC (490 acres), Cane Man Hill ACEC (680 acres), Rhyolite ACEC (126 acres), Tybo-McIntyre ACEC (80 acres), Mountain View Arrastra (40 acres), Moores Station Petroglyphs (40 acres), and Railroad Valley ACEC (440 acres). (See Appendix 16 for legal descriptions.)

6. Maintain the classification and closure of 10,863 acres to mineral entry.

7. Classify and close to mineral entry 23,752 acres to be allocated to agricultural entry.

MINERAL MATERIALS

Objective:

To meet public demand for mineral materials on a case-specific basis while applying appropriate environmental safeguards.

RMP Determinations:

1. Black Rock Lava Flow and Easy Chair Crater will remain closed to mineral material sales and are incorporated into the Lunar Crater ACEC.

2. Continue to provide mineral materials from existing authorized sources. Open new pits as necessary.

3. A total of 5,982,393 acres will be open to mineral material disposal under standard terms and conditions.

4. Apply seasonal restrictions on mineral materials on 72,400 acres of seasonal wildlife habitat (see Maps 34 and 35) (see Wildlife RMP Determinations).

5. The following areas will be closed to mineral material disposal: Berlin Town Site (704 acres), Project Faultless (2,560 acres), Mountain View Arrastra

(40 acres), Moores Station Petroglyphs (40 acres), Jumbled Rock Petroglyphs (10 acres), Amargosa-Oasis ACEC (490 acres), portions of the Railroad Valley ACEC (3,480 acres), Cane Man Hill ACEC (680 acres), Tybo-McIntyre ACEC (80 acres), Rhyolite ACEC (425 acres), Lunar Crater ACEC (39,680 acres), The Sump (1600 acres), The Gravel Bar (675 acres)(see Appendix 16 for legal descriptions) and facilities in the ERMA (estimated 60 acres, however, specific locations have not been identified).

NON-ENERGY LEASABLE MINERALS

Objective:

To provide maximum opportunity for the leasing and development of solid leasable minerals, and apply appropriate environmental safeguards.

RMP Determinations:

1. A total of 5,481,206 acres will be open to non-energy mineral activities under standard terms and conditions.

2. Close 55,360 acres to non-energy mineral leasing as follows: Berlin Town Site (704 acres), Project Faultless (2,560 acres), Amargosa-Oasis ACEC (490 acres), portions of the Railroad Valley ACEC (3,480 acres), Mountain View Arrastra (40 acres), Moores Station Petroglyphs (40 acres), Jumbled Rock Petroglyphs (10 acres), Cane Man Hill ACEC (680 acres), Tybo-McIntyre ACEC (80 acres), Rhyolite (425 acres), Clayton Valley Sand Dunes (2,500 acres), Crescent Sand Dunes (3,000 acres), Lunar Crater ACEC (39,680 acres), The Sump (1600 acres) (see Appendix 16 for legal descriptions), and facilities in the ERMA (estimated 60 acres, however, specific locations have not been identified). (Some areas overlap, affecting acreage total.)

3. Apply seasonal restrictions on non-energy mineral leasing on 72,400 acres of seasonal wildlife habitat (see Maps 34 and 35).

4. A total of 604,535 acres in WSAs are closed to leasing.

FIRE MANAGEMENT

Objective:

To protect natural resources from unacceptable damage by fire in a cost-effective manner with a high regard for private property and safety. Promote resource management through prescribed fire to maintain the natural component of the ecosystem.

RMP Determinations:

1. All wildfires in Management Zone 1 will receive aggressive initial attack, to contain all fires in intensity levels 1 through 6, 90 percent of the time to 300 acres or less. All fire zones are shown on Maps 38 and 39.

2. Wildfires that threaten life and property, will be kept to five acres or less 90 percent of the time utilizing the most cost effective and efficient suppression action. This will include town sites, developed mines, ranches, powerlines, and other structures and property.

3. Wildfires that threaten resources, such as critical watersheds, riparian areas, desirable range (salt desert shrub), sage grouse strutting grounds, sensitive plant species sites, cultural resource sites, and sensitive forage plant species (bitterbrush and mountain mahogany) will be kept to minimum acres utilizing suppression action which could suppress and/or divert the fire and be cost effective and efficient.

4. If an approved natural prescribed fire plan is written, some wildfires in fire

management Zone 2 may be allowed to burn to promote a more natural fire regime. The sage brush/pinyon-juniper is considered a fire dependent ecosystem and adverse ecological changes may result by total fire exclusion (e.g. pinyon pine-juniper encroachment of grassy areas or declining grass productivity because of increased sagebrush cover).

The salt desert shrub vegetation type (i.e., Zone 1) is considered a fire independent ecosystem that usually maintains vigor and composition without fire.

STANDARD OPERATING PROCEDURES

The following standard operating procedures will be applied to this plan.

Environmental Review and Management

In compliance with NEPA and CEQ regulation, BLM will prepare site-specific environmental reviews before actions proposed in this RMP/EIS are implemented or prior to approval of any project authorized on the public lands. The environmental reviews provide site specific assessments of the impacts from implementing these actions. As appropriate, these reviews are documented in Categorical Exclusion Reviews, Environmental Assessments and Decision Records, or Environmental Impact Statements and Records of Decision. In addition, the environmental review identifies mitigating measures necessary to reduce adverse impacts of implementing a project or proposed action.

All future authorizations will be in conformance with the RMP. Existing authorizations will be brought into conformance when they are renewed.

Seasonal restrictions on activities which are included in this RMP to prevent disturbing of wildlife will apply to the following authorizations: fluid mineral leasing, non-energy mineral leasing, mineral material sales, geophysical prospecting, right-of-way construction, off-highway vehicle events, construction of range improvements, activities authorized under the Recreation and Public Purposes Act (R&PP Act), and vegetation sales. In general, maintenance of rights-of-way, range improvement projects, and other facilities will not be restricted. Locatable mineral exploration and development activities will be encouraged to abide by seasonal restrictions but cannot be required to do so.

Determinations that state: "No land uses will be authorized which are incompatible with an area's values" will include such activities as right-of-way grants, activities authorized under the Recreation and Public Purposes Act, off-highway vehicle events, vegetation sales, range improvement projects, non-energy mineral leasing, mineral material sales and geophysical prospecting, except where compatible or of benefit to the resources being protected. Rights-of-way and other discretionary lands actions will be granted in avoidance areas only if no feasible alternative routes are available. Any such grants, leases, or permits will include appropriate stipulations to protect the area's special values. This will not affect maintenance of existing projects or rights-of-way. Livestock grazing will continue to be authorized unless specifically excluded.

Air Resources

Air quality is protected by the establishment of mitigation measures designed to prevent deterioration of air quality prior to authorizing actions. This ensures meeting State goals for air quality and limits allowable emissions from existing and new point or non-point sources. Common mitigation measures include: watering roads and disturbed areas, the use of scrubbers/sprays, covered storage areas, and other measures to reduce emissions and pollutant concentrations to meet or exceed the standards of the Nevada Division of Environmental Protection.

Soil and Water Resources

Soil and water resources are protected by the establishment of mitigation measures designed to maintain or improve soil productivity and prevent or minimize soil erosion and floodplain sediment damage prior to authorizing actions and during the allotment monitoring and evaluation

process. To meet administrative needs the BLM will acquire appropriative water rights by applying for available water rights according to Nevada water law, or by assertion of a public water reserve.

Best Management Practices and appropriate mitigation will be identified during project level environmental review and applied during project implementation for any ground disturbing activity that may reduce soil productivity, or cause surface erosion.

Visual Resource Management

VRM classes are delineated in the RMP based on an inventory conducted in accordance with BLM visual management procedures (Manual 8400). The individual VRM classes provide management objectives to be implemented as a part of all activities authorized in the *Tonopah RMP*. The overall goal is to protect or enhance the visual and natural aspect and attributes of the public lands while minimizing the impacts of authorized activities.

Visual resources will continue to be evaluated, using the Contrast Rating process, as a part of activity and project planning. These evaluations will consider the significance of the proposed project and the visual sensitivity of the affected area. Stipulations will be developed and attached to project authorizations to maintain designated visual resources management classes. Stipulations may include requirements to locate activity sites behind topographic features, modify access routes, color buildings and equipment, develop in phases, etc. If VRM class objectives cannot be met, the impacts to visual resources will be detailed in the project level environmental assessment and used by the authorized officer as a factor in the decision to authorize or deny a proposed action.

To comply with BLM policy for Wilderness Study Areas (WSA), WSAs will be managed as interim VRM Class II areas until Congress makes final wilderness decisions for Nevada BLM WSAs. This will comply with the policy to manage WSAs to avoid impairment of existing wilderness values. As of March 30, 1989, limitations were placed on the authorization of activities which cause surface disturbance that require reclamation to restore an area to a pre-project condition. Following Congress's final wilderness decision, designated wilderness areas will be managed as VRM Class I areas. Lands not designated as wilderness will be managed according to the VRM classes designated in the RMP/ROD decisions.

Special Status Species

The Endangered Species Act (ESA) of 1973, as amended, declares it the policy of Congress that all Federal Divisions and agencies will conserve endangered species and threatened species and utilize their authorities in furtherance of the purposes of the Endangered Species Act. In accordance with section 7 of the ESA, consultation with the U.S. Fish and Wildlife Service will be conducted on all federal actions involving threatened or endangered species.

It is BLM policy to carry out special status candidate species management consistent with multiple-use for conservation of candidate species and their habitats and ensure that actions authorized or funded do not contribute to the need to list any of these species as threatened or endangered. In order to prevent listing of candidate species, BLM may enter into Conservation agreements or species management plans with the U.S. Fish and Wildlife Service.

A desert tortoise inventory will be required prior to any surface disturbing activity including plans of operations for locatable minerals, mineral leasing, off-highway vehicle events, rights-of-way, etc. on 70,600 acres of Non-Intensive Category III desert tortoise habitat.

In accordance with the Biological Opinion on livestock grazing in desert tortoise habitat, the following stipulation has been placed in affected grazing licenses: "Within Non-Intensive Category III desert tortoise habitat, livestock use may occur March 1 to October 14, as long as forage utilization does not exceed 40 percent on key perennial grasses, forbs and shrubs. Between October 15 and February 28, forage utilization shall not exceed 50 percent on key perennial grasses and 45 percent on key shrubs and perennial forbs."

Fish and Wildlife

Fish and wildlife habitat will continue to be evaluated on a basis as part of project-level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of fish and wildlife habitat in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with management objectives for fish and wildlife habitat. Habitat improvement projects will be implemented where necessary to stabilize or improve unsatisfactory or declining wildlife habitat condition. Such projects will be identified through habitat management plans or other activity plans.

Sufficient forage and cover will be provided for wildlife. Forage and cover requirements will be incorporated into allotment management plans and will apply to specific areas of primary wildlife use.

Range improvements generally will be designed to achieve both wildlife and range objectives. Existing fences will be modified and new fences will be built so as to allow wildlife passage. Water trough heights will allow for wildlife usage and bird ladders will be installed. Project requirements are listed in the livestock grazing management section.

Guzzlers constructed for wildlife will be designed to be protected from domestic livestock and wild horses/burros.

In accordance with BLM guidelines for domestic sheep management in bighorn sheep habitat, no domestic sheep grazing will be authorized in bighorn sheep habitat.

Chukar and other upland game habitats will be maintained and expanded through development of wildlife waters. Generally, no land disposal will be allowed within two miles of sage grouse nesting areas.

Forestry and Vegetative Products

The areas available for woodland harvest will be subject to the specific restrictions and withdrawals required by this RMP.

No broadleaf trees, dead or green, will be harvested because of their superior value to wildlife for nest trees.

Pinyon nut gathering will be authorized on an individual basis including Wilderness Study Areas released by Congress for multiple-use purposes.

Salvage of vegetative products may be authorized on areas subject to ground disturbing activities.

Livestock Grazing Management

Resource improvement planning will be in accordance with the procedures outlined in *BLM Handbook H-1741-1 Renewable Resource Improvement and Treatment Guidelines and Procedures*.

The grazing management program assigns priorities to management efforts using a selective management approach. Under this approach grazing allotments are categorized into "I," "M," and "C" management categories. The objectives for these categories are to: 1) *maintain* (M) the current satisfactory conditions; 2) *improve* (I) the current unsatisfactory conditions; or 3) manage *custodially* (C) while protecting existing resource values. Management priority will be given first to "I" allotments, second to "M" allotments, and third to "C" allotments (see Appendix 8).

Range improvement projects will be addressed in environmental documents and will be constructed in accordance with BLM Manual 9113. Existing access, or temporary roads will be used as much as possible. Temporary roads will be rehabilitated after use is completed.

The clearing of vegetation from project sites will be restricted to the minimum amount necessary to properly and safely complete the project.

All disturbed areas will be rehabilitated, where such action is necessary and/or practical, to replace ground cover and prevent erosion. The standard fence design used to control cattle movement in areas inhabited by resident and migratory populations of deer, horses and/or antelope, will be 42 inches in height. Fences in these areas will consist of three barbed wires and a smooth bottom wire. The spacing of the wires starting from the ground will be 16 inches, 22 inches, 30 inches and 42 inches. Line posts shall be spaced at a distance of 16.5 feet between each post. Fences in bighorn sheep habitat will be a three strand fence with spacing 20, 35, and 39 inches from the ground with a smooth bottom wire. Special design standards will be in accordance with the *BLM Handbook H-1741-1*. All fences will be designed to assure a minimum of impacts to wildlife, wild horses/burros, recreation, and visual resources.

Developed spring sources will be fenced and water provided for livestock and/or wild horses/burros away from the source. Water will be left at the spring source for wildlife use as required by Nevada Revised Statute.

Maintenance of livestock management structures will be accomplished by the livestock operator through cooperative agreements and range improvement permits as specified in the BLM's 1982 *Rangeland Improvement Policy* (USDI, BLM, Oct. 1982).

Alteration of sagebrush areas either through application of herbicides, prescribed burning, or by mechanical means will be in accordance with procedures specified in the Western States' Sage Grouse Guidelines and the Memorandum of Understanding between the Nevada Division of Wildlife and the Nevada BLM. All vegetation treatment projects will be coordinated with the Nevada Division of Wildlife at least one year in advance of implementation of the project.

Application of herbicides, such as 2,4-D, on proposed treatment areas to reduce sagebrush and other plant species will be in accordance with procedures established in BLM Manual 9222 to prevent impairment of non-target species.

Vegetative manipulation that will alter the potential natural plant composition will not be allowed in riparian areas. This includes the introduction of non-native species.

Wild Horse And Burro Management

It is the intent of the BLM to manage wild horses and burros and their habitat within areas occupied in 1971. Management is to be accomplished in a manner designed to achieve a thriving natural ecological balance and multiple-use relationship with other resource users.

Management of the wild horses and burros will also be guided by Herd Management Area Plans (HMAPs). The plans will be developed through consultation and coordination with interested parties and will be coordinated with livestock, wildlife, and other resource plans. The management plans will include, but not be limited to, discussions of seral stages, range trends, habitat requirements, dietary needs, water requirements, and wild horse reproductive capabilities.

Cultural Resources

The National Historic Preservation Act of

1966, as amended, the Archaeological and Historic Preservation Act of 1974, the Archaeological Resources Protection Act of 1979, the American Indian Religious Freedom Act of 1978, the Native American Graves Protection and Repatriation Act of 1990, FLPMA, and Executive Order 11593 provide for the protection and management of cultural resources. These laws are implemented through the following Federal Regulations: 36 CFR 60, 36 CFR 800, 43 CFR 7, and 43 CFR 8365.1-5, (a)(1).

The BLM is required to identify, evaluate, and protect cultural resources on public lands under its administration and to ensure consideration of cultural resources prior to initiation of proposed BLM authorized activities. If an area will be in any way affected by those activities, a cultural resources inventory will be conducted. In accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and the Programmatic Agreement among the Nevada BLM, the Nevada State Historic Preservation Office, and the Advisory Council on Historic Preservation, National Register eligibility determinations are made in consultation with the Nevada State Historic Preservation Office. A determination of effects to those eligible properties from the proposed project is also made in consultation with the Nevada State Historic Preservation Office.

Avoidance of cultural properties is the preferred mitigation. However, avoidance is inappropriate if, 1) the project will create on-going activity in the area, or 2) the project will greatly increase access into the area. Either of these conditions could lead to increased vandalism and/or accidental damage. Significant cultural properties to be protected through avoidance will be marked in the field and monitored on a periodic basis.

If eligible properties cannot be avoided, appropriate mitigating measures will be developed in consultation with the Nevada State Historic Preservation Office, and the President's Advisory Council on Historic Preservation. No action will be authorized until these agencies are consulted.

Cultural properties without National Register eligibility determinations will be treated as eligible properties until such determinations can be made.

Federal agencies are required to consider the views of Native Americans when a proposed undertaking may be in conflict with traditional lifeways/religious values. The American Indian Religious Freedom Act requires consultation with Native American religious and secular leaders to identify geographic areas which may be associated with traditional lifeway/religious practices.

Lands

Land tenure adjustments are discretionary. No lands will be disposed of unless they are identified in this RMP and meet certain criteria.

In order for public land to be sold, it must meet one of the following criteria set forth in Section 203(a) of the *Federal Land Policy and Management Act of 1976*:

--the land is difficult or uneconomic to manage as a part of the public lands; and it is not suitable for management by another Federal Department or agency.

--the land was acquired for a specific purpose: and it is no longer required for that, or any other, Federal purpose; or

--disposal of the land will serve important public objectives that can be achieved prudently or feasibly only if the land is removed from public ownership; and these objectives outweigh other public objectives or values that will be served by maintaining the land in Federal ownership.

Site-specific decisions regarding land ownership adjustments within the Resource Area are to be made based on whether the lands are needed for BLM programs, or whether or not they are considered more valuable for other purposes. The following criteria are applied to site-specific determinations for lands that are within areas identified for disposal or acquisition:

A. Public resource values, including, but not limited to:

--threatened, endangered, or sensitive species habitat

--sites or places eligible for inclusion on the National Register of Historic Places

--mineral potential

--wilderness areas and areas being studied for wilderness

--riparian areas, including springs and seeps

--nesting/breeding habitat for game birds/animals

--big game seasonal habitat

--recreation potential

--visual resources

--other designations authorized by law

B. Manageability

C. Suitability for development

D. Accessibility of the land for public use

E. Encumbrances

F. Social and economic impacts of land tenure adjustments

G. Consistency with other agency/governmental entity plans and policies.

These land ownership adjustment criteria are considered in environmental analyses and decisions prepared for specific adjustment proposals.

In addition, no disposals are allowed within two miles of sage grouse strutting grounds, and no disposals for agricultural purposes are allowed on lands with agricultural soil ratings of Class IV or higher, or with soils having a high susceptibility to erosion. The disposal of land will not be allowed if it would fragment ownership patterns.

Public lands identified for disposal may be made available for sale, exchange, agricultural entry, lease, or patent for recreation or public purposes. Some lands identified for disposal may not be sold due to lack of interest, and some may be retained in Federal ownership as a result of site specific application of the land ownership adjustment criteria.

Exchanges are authorized under Section 206 of the Federal Land Policy and Management Act (FLPMA) of 1976. Exchanges are the preferred method of acquisition when other methods, such as conservation easements or management agreements will not protect special value areas or resources. Exchanges must be in the public interest. The selected public land must be identified in an approved land use plan for disposal, and the offered private land may be identified in an approved land use plan for acquisition.

There are three authorities for the disposal of public land specifically for agricultural purposes: the Desert Land Act, the Carey Act, and the General Allotment Act. Disposal of public land for agricultural purposes must meet the requirements of one of the three acts listed above and have a supporting permanent water source permitted by the Nevada State Engineer.

All patents are issued subject to valid prior existing rights.

Public lands within areas which have not been identified for disposal are retained in Federal ownership and are managed by BLM. Unless these lands are dedicated to a specific use or uses, or are included within avoidance or exclusion areas, they are available for rights-of-way, FLPMA leases, and airport leases. Because color-of-title and mineral entry patents are non-discretionary actions, all public lands meeting specific regulatory criteria may be patented by these methods.

Land use permits and leases are granted under the authority of Section 302(b) of the Federal Land Policy and Management Act of 1976. Permits are issued for short-term, low-impact uses of the public lands. Leases are a long-term management tool used particularly where future disposal or dedication to another particular land use is contemplated. In general, all lands within the Resource Area which have not been dedicated to a specific use or uses are open to consideration for land use permits and non-major leases. Permit and lease applications are evaluated on an individual basis. The same public resource values considered prior to disposal are considered prior to the issuance of a permit or lease. A major lease will need to be identified in an approved land use plan.

It is BLM policy to identify, abate, and prevent unauthorized use of the public lands. Existing unauthorized uses of the public lands are resolved through termination, short-term permit, lease, sale, exchange, or by other appropriate means.

Since the passage of the Federal Land Policy and Management Act in 1976, the BLM has been in the process of reviewing all withdrawals and classifications of public lands. All new proposed withdrawals must be identified in an approved land use plan.

Unless the land has been dedicated to a specific use or uses, public land within the Resource Area is available for consideration for linear right-of-way for access and for utility transportation and distribution purposes. Such land is also available for areal right-of-way purposes.

Prior to issuance of a right-of-way authorization, a site specific environmental analysis is performed which considers, among other things, threatened, endangered, or sensitive species habitat; sites or places eligible for inclusion on the National Register of Historic Places; wilderness areas and areas being studied for wilderness; riparian areas; nesting/breeding habitat for animals; big game seasonal habitat; visual resources; and other considerations mandated by law.

Designated right-of-way corridors within the Resource Area are three miles wide except where topographic constraints exist. Grants for rights-of-way are still required for facilities placed within designated corridors. Designation of a corridor does not mean that future rights-of-way are restricted to corridors, nor does it mean that there is a commitment by the BLM to approve all right-of-way applications within corridors. Proposed disposal of land within corridors are analyzed to determine impacts these proposed disposal might have on future right-of-way activities.

Recreation

A broad range of outdoor recreation opportunities will continue to be provided on all segments of the public land, subject to the demand for such opportunities and the need to protect other resources. Special Recreation Management Areas, areas of concentrated use and existing facilities will receive first priority for operation and maintenance funds. Investment of public funds for new recreation developments will be permitted only on land identified to remain in public ownership.

Recreation resources will continue to be evaluated on an individual basis as part of

activity and project-level planning. Such evaluations will consider the sensitivity of, and the impacts on recreation resources in the affected area. Stipulations will be attached as appropriate to assure the compatibility of projects with recreation management objectives.

Special recreation use permits will be authorized on an individual case basis.

Decisions regarding the designation of areas open, limited (restricted) and closed to motorized vehicle access have been made in the RMP. An exception to designations in the RMP is emergency designations which may be necessary due to:

1. The need to minimize damage to soil, watershed, vegetation or other resource values.

2. The need to minimize harassment of wildlife or the degradation of wildlife habitat, especially habitat for sensitive, threatened or endangered species.

3. The need to promote user safety and protect the visiting public from hazardous situations.

Areas which are not designated as limited or closed will remain open for motorized vehicle use.

Existing mines will be closed to off-highway vehicle use by the public. The areas will remain closed until they have been reclaimed and the reclamation bond has been released.

Public land within areas closed to motorized vehicle use will be closed year-long to all forms of motorized vehicle use except for emergency or authorized vehicles.

Vehicle use in Wilderness Study Areas (WSA) is currently managed as limited to existing (1980 inventory) roads, trails and ways. This is a temporary designation which overrides the decisions in the RMP, pending final decisions by Congress with regard to WSAs. Following final Congressional action, those areas designated as wilderness will be closed to motorized vehicle use subject to valid existing rights and authorized nonconforming uses. Motorized vehicle use on lands which are not designated as wilderness will be managed according to the decisions in the approved *Tonopah RMP* and ROD.

The BLM, Nevada State Office has published a camping stay limit (effective November 5, 1993) for the public lands it manages: "A person or persons may not occupy undeveloped public lands or designated sites or areas for more than fourteen days within a twenty-eight consecutive day interval. Following the fourteen days, the persons and personal property must relocate to a site outside of at least a twenty-five mile radius from the occupied site or non-BLM administered land for a period of fourteen days.

In order to protect resources, or for administrative purposes, an authorized officer may, by posting notification, close a given site to occupancy, even if the same person or persons have not occupied the site for fourteen consecutive days."

All BLM lands that are not limited in the RMP are open to all individual, commercial and competitive outdoor recreation uses. Opportunities for exploring the back-country by vehicle, hunting, camping, sightseeing, and hiking are encouraged. There are no nationally significant river segments as defined in the National Wild and Scenic Rivers Act of 1964.

Areas of Critical Environmental Concern

A plan of operations will be required for any proposed mechanized disturbance to be caused in a designated ACEC during the search for, or the exploitation of locatable minerals. No mineral material sales will be allowed within any ACEC except certain

areas identified in the Railroad Valley ACEC.

Wilderness

BLM policy requires that all Wilderness Study Areas (WSA) be managed in accordance with the provisions of FLPMA Section 603 (c) and the Interim Management Policy for Lands Under Wilderness Review (IMP) so as not to impair their suitability for preservation as wilderness. The IMP provides management policies for WSAs between the time of WSA designation (11/15/80) and final decisions by Congress regarding these areas. The IMP contains specific management direction for activities in WSAs which may occur or be authorized.

The alternatives in this RMP have been developed under the assumption that there will be no wilderness designations. The actions proposed are those that may take place if the WSAs are released from wilderness consideration by Congress. Some of the determinations are compatible with the IMP and can be implemented while others must await Congress's final determinations. Also some RMP determinations may not comply with the IMP's nonimpairment requirements. These decisions may not be implemented until after Congress's final decision releasing the non-wilderness lands from the requirements and restrictions included in the IMP Policy.

Should Congress designate wilderness areas, the RMP will be maintained to include these new designations, and to modify determinations which conflict with wilderness management objectives. Management of areas designated as wilderness will be guided by the requirements of the Wilderness Act of 1964, specific enabling legislation, and the BLM's wilderness management procedures. While site-specific management objectives for wilderness areas will be included in future wilderness management plans, certain actions are non-discretionary, including closure to motorized vehicle use (except for valid existing rights and approved nonconforming uses by permit) and withdrawal from mineral entry.

Fluid Minerals

Oil and gas leases and geothermal leases grant the right to the operator to explore for, and to produce oil and gas. Leases are subject to certain terms and conditions which provide for compliance with applicable laws, ordinances, and regulations pertaining to fire, sanitation, conservation, water pollution, fish and wildlife, safety, protection of property, and reclamation.

In addition to the terms and conditions of the leases, stipulations may be applied to site-specific applications, to provide for stringent environmental protection of conflicting resources. These stipulations are developed by an interdisciplinary team as part of the environmental analysis process.

Since the passage of the Federal Oil and Gas Leasing Reform Act of 1987, all Wilderness Study Areas (WSAs) have been closed to mineral leasing.

Geophysical exploration for oil and gas, and geothermal resources may take place before or after the leasing of the lands. These actions will be reviewed by an interdisciplinary team in the Resource Area to identify and mitigate resource-related conflicts.

BLM actively encourages and facilitates the private development of public land mineral resources in a manner that satisfies national and local needs, and provides for economically and environmentally-sound exploration, extraction, and reclamation practices.

Land-use plans and multiple-use management decisions of the BLM will recognize that mineral exploration and development can occur concurrently or sequentially with relation to other resource uses.

Consultation with the U.S. Fish and Wildlife Service is required per section 7 of the Endangered Species Act prior to approval of an APD or other lease operations, if a proposed listed or listed threatened or endangered species or its critical habitat is likely to be affected by project activities. If there is deemed to be any adverse impact the proposal would be modified or the request denied.

Actions which would adversely impact a federal candidate plant or animal species will be modified in order to prevent possible future listing of these species as threatened or endangered.

Locatable Minerals

BLM provides for mineral entry, exploration, location, and operations pursuant to the mining laws in a manner that, 1) will not unduly hinder the mineral activities, and 2) assures that these activities are conducted in a manner which will prevent undue or unnecessary degradation of the public land.

Notification to the authorized officer is required on all operations in project areas in which cumulative surface disturbance will be five acres or less. Additional or amended notices require concurrent reclamation such that cumulative disturbance does not exceed five acres.

A Plan of Operations and a Reclamation Plan are required in situations in which there will be more than five acres of cumulative unreclaimed surface disturbance in a project area. These two plans are also required for any mining activity on special category lands, such as ACECs and areas closed to off-highway vehicles. Appropriate off-site mitigation will be considered during a plan of operation review for locatable mineral actions when an irretrievable loss of important habitat is unavoidable, or a significant long term adverse impact will occur. The preferred alternatives to off-site mitigation are: 1. avoidance of critical habitat 2. complete on-site restoration of disturbed habitat to approximate pre-disturbance productivity.

Plans of Operations may be modified by the authorized officer to meet the requirements of the regulations and to prevent undue or unnecessary degradation.

Plans of Operation cannot be approved until Section 106 of the National Historic Preservation Act, and Section 7 of the Endangered Species Act, and the National Environmental Policy Act have been complied with.

Reclamation of disturbed areas is required for all levels of activity: Casual Use, Notice, or Plan of Operations.

Additional regulatory requirements will be enforced in WSAs through regulations (43 CFR 3802), and through the Interim Management Policy (IMP) for WSAs.

All operations shall comply with Federal and State laws, including those relating to air quality, water quality, solid wastes, fisheries, wildlife and plant habitat, and archaeologic and paleontological resources.

The BLM will conduct validity examinations, reviewing the validity of mining claims to determine if a discovery has been made, under the following conditions:

1) Where a mineral patent application has been filed and a field examination is required to verify the validity of the claim(s).

2) Where there is a conflict with a disposal application, and it is deemed in the public interest to conduct a validity examination; or where the statute authorizing the disposal requires the removal of mining claims that are not valid. If the validity examination made in the latter case were to show that the mining claim was valid, the disposal action could not be completed.

3) Where the land is needed for a Federal program.

4) When a mining claim is occupied under the guise of the mining law and flagrant or questionable misuse of the land is observed, the BLM will undertake a surface use determination. If it is found, in fact, that such use is not necessary for, and reasonably incident to, mineral development, BLM will act to terminate the use and seek compensation for damages. Validity of the claim would not be relevant in this case.

Withdrawals from mineral entry will be enacted only in cases in which there are significant resource values that cannot be adequately protected under the regulations concerning surface management. Such withdrawn acreage will include areas recommended for wilderness designation, sensitive species habitat, riparian areas, areas possessing important historical and cultural resources, and areas set aside for recreational development.

Bonding will be required for all plans of operations to ensure that reasonable reclamation takes place. All operations using cyanide will follow the requirements as outlined in BLM's Nevada Cyanide Management Plan.

The BLM will coordinate each mine plan and mine closure in conjunction with consultations with the Nevada Division of Environmental Protection, Bureau of Reclamation and Regulation. This coordination ensures that the State of Nevada reclamation laws are implemented on Federal and private lands, and that all necessary state permits will be issued and followed.

Mineral Materials

Mineral material disposal will not occur in Wilderness Study Areas.

All mineral material disposals are discretionary. Appropriate terms and conditions are applied to ensure that the permittee will comply with all applicable laws and environmental safeguards.

Disposal to State, county, and municipal governments will generally be processed through the issuance of free use permits (FUPs).

In all mineral material disposal the BLM will strive, wherever possible, to use existing mineral material pits.

Disposal of such common-variety mineral materials as sand and gravel may not be made from mining claims, unless the date of the mineral materials contract or permit precedes the date of the location of the claim. This policy applies to all types of mining claims including placer, lode, millsite, and tunnel site. Mining claimants may not sell unpurchased mineral materials which are on their unpatented mining claims.

Non-Energy Leasable Minerals

An environmental analysis is conducted on each prospecting permit before the lease is approved. The environmental analysis is prepared by an interdisciplinary team and is used to determine any special stipulations necessary for the protection of surface resources.

Fire Management

The fire management program is guided by the approved Battle Mountain District Fire Management Activity Plan and this RMP.

Every wildfire within the Resource Area will have an appropriate action taken to suppress it. The action will be planned and executed in such a way as to minimize the costs of suppression and the loss of resources. Such actions must also be consistent with resource management objectives.

There will be no use of fire retardant in riparian areas, WSA's, sensitive visual resource management areas, and structure archeology sites, unless such use is authorized by the authorized officer.

All wildfires will be evaluated by a rehabilitation team, after they are declared out, to determine the actual needs related to the rehabilitation. Corrective measures will be taken to prevent erosion and future resource degradation when it is feasible to rehabilitate areas damaged by actual suppression action. The rehabilitation team will also determine if any fire rehabilitation, including protection from grazing, is needed to revegetate the burned area, and to protect the site from erosion and invasion by undesirable plant species. Emergency fire rehabilitation will follow procedures outlined in *BLM Handbook H-1742-1* and the Battle Mountain District approved Normal Fire Rehabilitation Plan.

When identified as the least costly and/or most effective method, prescribed fire techniques will be used as a resource tool to meet vegetative objectives as stated in this RMP. Prescribed fire can be used to improve wildlife habitat, watershed improvement and other types of vegetative manipulation to meet vegetative objectives. In addition it can be used solely, or in combination with other fuel/vegetative manipulation techniques. When fire is used as a management tool, an approved prescribed burn plan and wildfire prescription must be prepared in advance of planned or unplanned ignition in accordance with *BLM Manual 9214*.

Integrated Pest Management

It is the policy of the BLM that all alternatives to integrated pest management must be explored before any pest control program decision is implemented. This includes all pest control programs done under BLM proposals, cooperative projects, or on lands under permit or lease. Consideration must be given to economics, efficacy, and the environment. Potentially harmful pests must continue to exist in acceptable levels of abundance. The philosophy of integrated pest management is to manage pests rather than to eradicate them.

Hazardous Materials

The BLM will not authorize the disposal of hazardous materials on public lands. When hazardous materials are located on public lands, the following sequence of actions will occur: reporting, necessary site security, coordination of procedural clean-up, and monitoring results of clean-up. Actions taken by the BLM can also include prosecution of those responsible for illegal dumping.

The BLM ensures that the initiators of actions which use hazardous materials on public land have the necessary permits, from the State of Nevada and, if necessary, the Environmental Protection Agency, which are designed to protect the environment. These permits become conditions of approval by the BLM for actions on Federal lands.

RMP IMPLEMENTATION, MONITORING, EVALUATION, AND MAINTENANCE

Implementation of some determinations will begin immediately upon approval of the RMP. An Implementation Schedule will be developed within a reasonable timeframe (90 days) for the remaining determinations. This schedule will establish priorities and give a basis for short-term and long-term budget requests.

The effect on the environment from implementing the proposed RMP would be monitored. Other environmental values or issues, not now considered, would be incorporated into the plan through the maintenance or amendment process and formally monitored.

The approved plan will be evaluated every five years or more frequently if determined through monitoring. Plan maintenance will be used to make minor changes in data, including posting of new data and information. Maintenance will be done to keep the plan current and extend its useful life.

The Tonopah RMP is intended to be a dynamic document, which must be monitored and maintained and/or amended to remain viable. The need for a plan amendment is identified through plan implementation, and monitoring and evaluation findings, or in response to internally or externally initiated proposals which don't conform to the RMP, but which warrant consideration. Other events which could require a plan amendment include: 1) changes in BLM policy, such as statutory requirements, 2) new data or information becomes available, 3) changes in management emphasis, 4) court orders.

In general, a plan amendment changes a part of the existing plan or adds to it, allows new proposals to be considered and incorporated, and helps to make the plan more useful and extend its life.

CHAPTER 3

AFFECTED ENVIRONMENT

AIR RESOURCES

Air quality in the Tonopah Resource Area is designated as "attainment" (meeting air quality standards) and is managed to prevent significant deterioration.

SOIL RESOURCES

An Order 3 soil survey has been completed on most of the Resource Area. The information obtained from the soil survey is used for evaluating the land-use potential, establishing potential natural plant communities, and developing reclamation plans. More intensive surveys are needed to formulate site-specific decisions concerning such practices as: water developments, erosion control, vegetative manipulation, agricultural entry and other types of uses.

The soils in the valleys are mainly mineral soils of two types: those which do not have water continuously available for three months when the soil is warm enough for plant growth (Aridisols); and soils showing little evidence of the soil forming process, the development of horizons or layers (Entisols).

In the mountains there are Aridisols and Entisols and some deeper mineral soils with grass cover and a brown surface horizon (Mollisols). Entisols generally occur on steep mountain slopes where erosion is active. They also occur on flood plains and alluvial fans where new material is deposited. The Aridisols and Mollisols are older and occur on more stable alluvial fans and terraces.

Soil loss through wind and water erosion is a normal occurrence throughout the Resource Area. *The Tonopah Grazing EIS* summarizes the 1971-1974 erosion condition and vegetation from the Phase I Watershed Conservation and Development Inventory as described in BLM Manual 7322. Sediment yield and plant composition were gathered. Erosion does occur in some areas in excess of the tolerable soil loss limits (soil erosion at a rate which exceeds the amount of soil development for the same period of time). These areas, due to the lack of a natural occurring plant canopy, soil texture and slope, exhibit large volumes of soil erosion and low soil development characteristics. The desert land and vegetation naturally have areas of high erosion. Many of these locations are not conducive to land treatments and do not necessarily correlate to the erosion condition class.

WATER RESOURCES

The absence of adequate perennial surface water is the limiting factor in the management of fisheries, wildlife, wild horses and burros, and livestock.

Information available on water quality is very limited. Data gathered in 1982 for the preparation of the *Esmeralda-Southern Nye RMP* indicate that many water sources did not meet the Environmental Protection Agencies minimum standards for drinking water at that time. Often the constituents of concern are inherent in the water as a result of natural processes in the aquifer or surface strata. For detailed information, refer to *"Water Quality Analysis - Final Report - BLM Nevada/Chinook Research Laboratories, Inc."*

VEGETATION

There are eight basic vegetation types as follows: salt desert shrub, sagebrush, pinyon-juniper woodland, greasewood, hot desert, alkali meadows and bottoms, mountain mahogany, and riparian areas.

Two different types of vegetation inventories have been conducted. These are Livestock Forage Condition and Ecological Status Inventory. The Livestock Forage Condition inventory was adapted from Phase I Watershed Inventory data collected during the early 1970's. This inventory determined vegetation condition based upon palatability of primary plant species for livestock. This inventory was superseded by the Ecological

Site Inventory which bases vegetation condition upon a comparison between the existing and the potential vegetation composition and production for a particular site.

The eight basic vegetation types are shown on Maps 5 and 6 and are further described below:

1. Salt Desert Shrub. This is the most dominant vegetation type amounting to approximately 56 percent of the Resource Area. This type is more common in Esmeralda County than in northern Nye County. The ecological sites associated with this type occur mainly in the valleys on alluvial fans and up into the hills in the southern end of the Resource Area in precipitation zones of 3-5" and 5-8".

   In climax condition, (Potential Natural Community or PNC) salt desert shrub range is good to excellent winter range for livestock and poor to fair spring, summer and fall range. These sites may be good range for big game species. In its current condition in the Resource Area, this vegetation type is only fair to good winter range, very poor spring range and poor to fair summer and fall range.

   a. Less than 10 percent of salt desert shrub ecological sites have the potential to produce winterfat or fourwing saltbush. Both shrubs are very palatable and nutritious winter feed for livestock, horses and big game and are easily damaged by spring use. These ecological sites are generally in mid to early seral stage. They are currently dominated by rabbitbrush or halogeton. Winterfat sites in early or mid seral stage often have soil erosion problems.

   b. Over 90 percent of salt desert shrub range has potential to produce mainly shrubs such as shadscale, Bailey greasewood and some black greasewood. Condition at these sites is late seral with some mid seral on more productive sites. In its current condition, the majority of the desirable forage plant species have been depleted.

2. Sagebrush. Approximately 25 percent of the Resource Area is composed of this type making it the second most common type in the Resource Area. It occurs mainly in the mountains and hills and is less common in the southern half of the Resource Area. In northern Nye County it extends down into the higher elevation valleys (Smoky, Little Fish Lake and Reveille Valleys). It grows in the 8-12" and higher annual precipitation zones.

   a. The majority of sagebrush range in this Resource Area is dominated by black sagebrush which is excellent sheep winter forage but poor for horses and cattle. These ecological sites are generally in late seral with some mid seral stage condition on sites with potential to produce more grass. Because the majority of livestock in this Resource Area are cattle, these sites are relatively unimportant winter range for livestock. The sites produce a small amount of grass which is used during the growing season. It is important deer winter range. Deer prefer the more diverse black sage sites in drainages or adjacent to woodlands.

   b. Wyoming big sagebrush is the second most common sagebrush ecological site. These sites in PNC are good spring, summer and fall range and poor winter range for livestock and horses. Currently they are in mid seral condition and produce a small amount of grass. Good early spring and late summer range is rare in the Resource Area. Some of this Wyoming big sagebrush range is suitable for crested wheatgrass seeding which would provide some spring, summer and fall forage. It is important deer winter range but, in its current condition, it does not provide a diverse shrub mix for forage. There

is little potential for cliffrose and bitterbrush except in drainages.

3. Pinyon-Juniper Woodlands. Approximately five percent of the Resource Area is composed of this type. It occurs in the mountains and is less common in Esmeralda County. It occurs on the Hot Creek, Kawich, Grant, Pancake ranges, and Squaw Hills, Silver Peak and Palmetto Mountains. Understory vegetation is sparse and usually is black sagebrush or big sagebrush. Average annual precipitation is above 12". Most livestock grazing occurs on open areas in woodland country. Cut or burned areas provide good winter forage for deer. Heavily wooded areas provide little forage.

4. Greasewood. Approximately seven percent of the Resource Area is composed of this type. It occurs on valley bottoms throughout the Resource Area. Black greasewood is an indicator of a high water table and is closely associated with alkali meadows and bottoms. This vegetation type produces mainly less palatable shrubs and few grasses. Annual precipitation is 3-8 inches. These sites are usually in late seral condition.

5. Hot Desert. Approximately four percent of the Resource Area is composed of this type. It occurs from Scottys Junction south in Esmeralda County and the southern portion of Nye County. The hot desert type is located in the valleys and low hills. The salt desert shrub type occurs on the higher hills. Annual precipitation is 3-5" and 5-8". These sites are usually in late seral condition. Use occurs on saltbush and grasses.

6. Alkali Meadows and Bottoms. Approximately three percent of the Resource Area is composed of this type. It occurs on valley bottoms through out the Resource Area. Major areas are Railroad Valley, Sarcobatus Flat, the north end of Big Smoky Valley, Alkali Flat and Fish Lake Valley. These areas are fair spring and summer range in current condition. These sites have up to 85 percent grass, but it is coarse and less desirable than the cool season bunch grasses on adjacent sites. Great basin wildrye would grow on this site in PNC but it has been grazed out. These sites are usually in mid-seral stage. Annual precipitation is 3-8".

7. Mountain Mahogany. Less than one percent of the Resource Area is composed of this type. It occurs in the mountains adjacent to Pinyon-Juniper woodlands and is less common in Esmeralda County. Small amounts occur in the Silver Peak Range and Palmetto Mountains. Most is in the Grant, Kawich, Reveille and Pancake ranges. Annual precipitation is above 12". These areas are generally too steep or high for livestock use. Mountain mahogany is good big game forage.

8. Riparian Areas. Less than one percent of the Resource Area is composed of this type. It occurs along streams, springs and seeps.

9. Playas. Less than one percent of the Resource Area is composed of dry lake beds. Playas are generally devoid of vegetation.

VISUAL RESOURCE MANAGEMENT (VRM)

Visitors to the Resource Area are attracted to its wide open spaces and vistas. US Highway 95 traverses the Resource Area from north of Coaldale to south of Beatty. The highway is the main travel route between Las Vegas and Reno affording travelers panoramic views of the topography, north-south trending mountain ranges and intervening basins. The landscapes are dominated by flat playas, level basin fill plains and long sloping alluvial fans which merge upwards into the mountains. The mountain slopes are sheer and angular with extensive rock outcrops.

VRM Classes were established in the *Tonopah MFP* for the east portion of the Resource Area in 1981. See Appendix 3 for a description of VRM classes.

Visual Resource Inventory Classes were assigned in accordance with *BLM Handbook 8410-1* in 1991 for the west portion of the Resource Area.

WILDLIFE HABITAT

The Resource Area is comprised of a broad range of individual and overlapping types of wildlife habitat.

Mule Deer Mule deer inhabit the mountainous portions of the Resource Area (see Map 10 and 12). Habitat in the southern two-thirds of the Resource Area is considered marginal. These marginal deer ranges are typified by monotypic stands of pinyon and juniper, lacking in preferred forage species such as bitterbrush, and serviceberry. A total of 116 study sites have been established to monitor mule deer habitat conditions. Poor conditions are reflected on three percent of the sites, fair conditions on 28 percent, good conditions on 54 percent and 15 percent are in excellent condition.

Summer ranges are in fair condition due to lack of important forb and grass species. In some cases competition exists between deer, livestock, and wild horses/ burros for forbs and grasses during spring and early summer. Perhaps one-third of the deer habitat is poorly utilized due to lack of water.

Winter ranges are in generally good to excellent condition. However, encroachment by pinyon-juniper woodland and heavy use of important browse species by livestock have contributed to deterioration of portions of some winter range. The largest deer concentrations occur on winter ranges on the Toiyabe Bench. Human activity on winter range is a potential threat to wintering herds from mid January through April.

Antelope Antelope populations have been slowly increasing since the mid 1970's. Antelope occur in small bands mostly in the north half of the Resource Area (see Map 9 and 12). Known use areas include the pinyon-juniper foothills during summer months and valley bottoms in winter months. Distribution is heavily dependent upon water availability. Although antelope benefit from livestock water developments, the waters are not maintained when livestock are not present. Conflicts for forage and water exist between pronghorn, livestock and wild horses/burros. A total of 45 study sites have been established to monitor antelope habitat conditions.

Desert Bighorn Sheep Bighorn sheep populations occur in several mountain ranges in the Resource Area (see Map 10). In addition, five other ranges which do not currently support bighorn sheep contain suitable habitat.

Since bighorn generally concentrate within a two mile radius of water during the summer, adequate forage within that radius is the limiting factor. It is crucial to the survival of bighorn in the Resource Area that critical summer use areas within a two mile radius of water sources remain relatively undisturbed. These areas can be adversely impacted by human intrusions associated with off-highway vehicle events and mining activities. Based on available study information, most of the bighorn habitat is in good condition. A total of 47 study sites have been established to monitor bighorn sheep habitat conditions. Poor conditions are reflected on two percent of the sites, fair condition on 15 percent of the sites, good condition on 53 percent of the sites and 30 percent of the sites are in excellent condition.

Critical bighorn sheep lambing areas have been identified around key waters adjacent to precipitous terrain in bighorn sheep habitat areas (see Map 10 and 13).

Seasonally, conflicts with livestock and/or wild horses/burros can occur. Competition for forage, as well as water, can occur between bighorn sheep and livestock and wild horses/burros.

Rocky Mountain Elk A huntable population of elk inhabit the Monitor Range (managed by the Toiyabe National Forest). This herd utilizes a small area of BLM administered lands on the slopes of the Monitor Range for winter range (see Map 9). A total of 28 study sites have been established to monitor elk habitat conditions. Poor conditions are reflected on four percent of the sites, fair conditions on four percent of the sites, good conditions on 67 percent of the sites and 25 percent of the sites are in excellent condition.

Waterfowl The Railroad Valley Wildlife Management Area provides important waterfowl habitat for migrating and nesting waterfowl. Seasonal migration habitat occurs in Big Smoky Valley and Fish Lake Valley, as well.

Sage Grouse Sage grouse are widely scattered through much of the big sagebrush vegetation type in the northern part of the Resource Area (see Map 11 and 12). Strutting grounds are of primary importance to the management of sage grouse habitat since they serve as focal points for reproduction, nesting, and brood-rearing activities. Most nests are located within two miles of active strutting grounds. Riparian and wet meadow habitats are also very important to grouse reproduction. Essential foods for grouse chicks are concentrated in these habitats, and hens with chicks tend to concentrate their activities near wet meadows and springs after the first three weeks of the chicks life. Wintering habitat is characterized by areas of greatest available sagebrush canopy cover.

Raptors nest and occur seasonally and/or yearlong throughout most of the Tonopah Resource Area.

SPECIAL STATUS SPECIES (Plants and Animals)

There are several special status species, both plant and animal, in the Resource Area. Category 1 (C1) is the taxa for which USFWS has sufficient information to indicate that listing is appropriate. Category 2 (C2) is the taxa for which the USFWS has information to indicate that listing is possibly appropriate (additional information needed).

Plants There are no plants listed as threatened or endangered in the Resource Area. One C1 plant, the Williams Combleaf (*Polyctenium williamsiae*), is known to occur.

Priority habitats have not been identified for candidate plants occurring in the Resource Area. Category 2 plants are listed in Table 3 A.

Animals There are two threatened animals in the Resource Area, the desert tortoise and the Railroad Valley springfish.

Desert Tortoise

The Mojave population of desert tortoise (*Gopherus agassizii*) is listed both federally and state as threatened and occurs on approximately 70,600 acres at the south end of the Resource Area (see Map 15). Critical habitat for the Desert Tortoise was designated on February 4, 1994. No critical habitat was designated in the Resource Area. The BLM has determined the portion of the species range in the Resource Area as Non-Intensive Category III habitat. The goal for Non-Intensive Category III desert tortoise habitat is to limit habitat and population declines to the extent possible by mitigating impacts. Direct impacts from grazing may include trampling of shelter sites and rest sites. Indirect impacts include loss of cover, change in vegetation and compaction of soils in areas where livestock concentrate. The increasing use of off-highway vehicles is having an effect on tortoise. Direct mortality results from crushing tortoise above ground or in their burrows. The desert ecosystem is also degraded as a result of off-highway vehicle use.

The desert tortoise is most active when annual plants are most common. Forage must be sufficient to allow females to accumulate energy reserves for egg production. Egg laying occurs May through July. Hatching occurs from August to October. The hatchlings ignore food and water and begin dormancy shortly after hatching. In the spring tortoise eat forbs and annual grasses. In the late spring and summer they eat dried grasses.

Railroad Valley Springfish

The Railroad Valley springfish (*Crenichthys nevadae*) is listed as federal threatened. It is located in several warm springs in Railroad Valley (see Map 14). Within the Resource Area, North Spring and Reynolds Spring have been designated as critical habitat by the USFWS. Chimney Spring also maintains a population of Railroad Valley springfish but is not considered critical habitat by USFWS. All populations in the Resource Area are doing well; however, the Nevada Division of Wildlife (NDOW) has reported that encroaching riparian vegetation in the springs may result in degradation of the aquatic habitat. Currently the greatest potential threat to the springfish is loss of waterflow from individual springs caused by broad based

lowering of the water table through interbasin transfer of ground water. Several candidate animal species also exist in the Resource Area (see Table 3 B and Maps 14 and 15).

TABLE 3 A
CATEGORY 2 PLANTS OF THE TONOPAH RESOURCE AREA

Eastwood milkweed	(*Asclepias eastwoodiana*)
Black wooly-pod	(*Astragalus funereus*)
Current milk-vetch	(*Astragalus uncialas*)
Tecopa bird's beak	(*Cordylanthus tecopensis*)
Spring parsley	(*Cymopterus ripleyi var. saniculoides*)
Tiem's buckwheat	(*Eriogonum tiehmii*)
Pahute green gentian	(*Frasera pahutensis*)
Golden bush	(*Haplopappus graniticus*)
Dune penstemon	(*Penstemon arenarius*)
Bashful penstemon	(*Penstemon pudicus*)
Mono phacelia	(*Phacelia monensis*)
Blaine's fishhook cactus	(*Sclerocactus blainei*)
Tufted globemallow	(*Sphaeralcea caespitosa*)

TABLE 3 B
CATEGORY 2 ANIMALS OF THE TONOPAH RESOURCE AREA

Fish Spring pocket gopher	(*Thomomys umbrinus abstrusus*)
San Antonio pocket gopher	(*Thomomys umbrinus curtatus*)
Ferruginous hawk	(*Buteo regalis*)
Snowy plover	(*Charadrius alexandrinus nivosus*)
Mountain plover	(*Charadrius montanus*)
White-faced ibis	(*Plegadis chihi*)
Long-billed curlew	(*Numenius americanus*)
White River desert sucker	(*Catostomus clarki intermedius*)
Big Smoky Valley tui chub	(*Gila bicolor ssp.*)
Railroad Valley tui chub	(*Gila bicolor ssp.*)
Fish Lake Valley tui chub	(*Gila bicolor ssp.*)
Monitor Valley speckled dace	(*Rhinichthys osculus ssp.*)
Amargosa toad	(*Bufo nelsoni*)
Oasis Valley speckled dace	(*Rhinichthys osculus ssp.*)
Pygmy rabbit	(*Brachylagus idahoensis*)
Mountain quail	(*Oreortyx pictus*)
Loggerhead shrike	(*Lanius ludovicianus*)
Chuckwalla	(*Sauromalus obesus*)
Spotted bat	(*Euderma maculatum*)
Crescent Dune aphodius scarab	(*Aphodius* sp.2)
Crescent Dune aegialian scarab beetle	(*Aegialia crescenta*)

RIPARIAN HABITAT

Riparian habitats represent less than one percent of the Resource Area. Important streamside riparian habitats have been inventoried and are shown on Maps 14 and 15 and Table 3 C. Most inventoried streamside riparian areas have less than 70 percent streambank stability and 70 percent streambank cover ratings. (However, proper functioning condition has not been determined for the majority of streams in the Resource Area). This is primarily due to grazing and trampling by grazing animals and surface disturbance associated with mineral exploration and development. Research has shown that riparian habitats characteristically have a greater

diversity of plant and animal species than adjoining areas. Riparian areas, including springs and seeps, provide habitat which is critical to many wildlife species. Healthy riparian systems filter and purify water as it moves through them, reduce sediment loads and enhance soil stability, provide micro climatic moderation, and contribute to ground water recharge and base flow. Riparian areas around springs and seeps have not been inventoried for condition.

The low and unpredictable precipitation, poor soils, and sparse vegetation would limit riparian area restoration under existing natural conditions. Also consumptive and disruptive resource uses within riparian areas reduces the success of rapid riparian restoration.

The principal consumptive use within riparian areas is grazing. The small tracts of riparian habitat within enormous grazing allotments complicates management. Water sources for livestock management, other than those naturally occurring riparian areas, are limited, thus restricting management options. Also reducing management options are the questions of water rights and limiting access to riparian areas.

Riparian habitats are also affected by mineral exploration, development, and production. Of the riparian areas inventoried, 29 percent are in areas of high potential and 31 percent are in areas of moderate potential for locatable minerals. The practice of conducting exploration within riparian corridors, washes, or upon springs is most prevalent in the west portion of the Resource Area, where placer operations are conducted. Stipulations may be imposed on Plans of Operation to protect riparian habitat. However, protection of riparian habitat under Notices is more difficult since regulations do not provide the same opportunity to impose stipulations. This produces uncertainty for long-term management or restoration practices.

FORESTRY AND VEGETATIVE PRODUCTS

Pinyon-Juniper Woodlands There are an estimated 314,000 acres of pinyon-juniper woodlands in the Resource Area (see Maps 5 and 6). Of these, approximately 27,000 acres are accessible, and available for fuelwood harvest outside Wilderness Study Areas (WSAs). The 27,000 "operable" acres are capable of producing 1,185 cords annually on a sustained yield basis. Public demand over the last five years has averaged 675 cords. Unauthorized wood cutting is estimated at 170 cords.

Approximately 141,000 acres of pinyon-juniper woodlands are within WSAs. If all pinyon-juniper woodlands were released by Congress from WSA status, an additional 14,300 "operable" woodland acres would be available. An additional 530 cords could then be sold annually on a sustained yield basis.

Dead and down pinyon-juniper trees may be harvested for firewood anywhere in the Resource Area, except within WSAs. There are greenwood cutting areas established at: Palmetto Wash (3,800 acres), Palmetto (2,600 acres) and Silver Peak (2,600 acres). Approximately one-third of the greenwood volume has been removed from these areas.

Joshua Trees Approximately 231,000 acres in the Resource Area produce Joshua trees. One harvest area near Magruder Mountain, approximately 1800 acres in size, has been established for non-commercial harvest. Currently sales average less than 100 trees per year. Allowable harvest from this area is unknown at this time. No inventory has been conducted to determine the sustained yield production on the total Joshua tree acreage.

LIVESTOCK GRAZING MANAGEMENT

The Resource Area has 29 grazing permittees/lessees with privileges to graze livestock on 34 allotments covering approximately six million acres (see Maps 16 and 17). The past five years average actual use has been 167,102 animal unit months (AUMs) of authorized grazing use. Grazing allotments are licensed for cattle, sheep or horses with various seasons of use, livestock numbers, and grazing management systems.

Livestock grazing has been excluded from critical winter range for mule deer on Toiyabe Bench. This area may be grazed by livestock under prescribed conditions after certain habitat conditions have been met.

TABLE 3 C
SUMMARY OF STREAM HABITAT IN THE TONOPAH RESOURCE AREA

STREAM NAME	MILES ON BLM	YEAR OF SURVEY	% STREAMBANK COVER	% STREAMBANK STABILITY	FISH SPECIES
AMARGOSA RIVER	2.0	1987	75 %	65%	OASIS VALLEY SPECKLED DACE
BARKER CREEK	0.5	1978 1982 1985 1988	89 76 72 73	83 59 55 73	BROOK AND RAINBOW TROUT
BARLEY CREEK	1.0	1977 1985 1988	38 25 25	34 25 25	BROOK, RAINBOW,AND BROWN TROUT
BREEN CREEK	2.4	1989	75	52	
CLEAR CREEK	1.0	1977 1987	50 50	25 25	BROOK AND RAINBOW TROUT *
CORCORAN CREEK	1.0	1982 1987	28 25	25 25	RAINBOW AND BROWN TROUT *
COTTONWOOD CANYON	1.0	1977 1989	70 63	83 50	
DEEP CREEK	1.0	1982	100	81	
EDEN CREEK	5.0	1978 1982 1985	55 62 66	64 62 76	
HOOPER CANYON	1.0	1977 1982 1989	75 59 52	100 69 70	
HUNTS CANYON	2.0	1982 1989	50 42	75 51	
JEFFERSON CREEK	1.0	1978 1986 1989	69 66 82	69 56 78	RAINBOW TROUT
LITTLE MEADOW	1.0	1989	13	14	

* Indicates unconfirmed occurrence of the species.

Table Continued on Following Page

TABLE 3 C (Continued)
SUMMARY OF STREAM HABITAT IN THE TONOPAH RESOURCE AREA

STREAM NAME	MILES ON BLM	YEAR OF SURVEY	% STREAMBANK COVER	% STREAMBANK STABILITY	FISH SPECIES
MOORES CREEK	0.5	1977 1981 1985 1988	100 91 71 89	90 81 51 80	RAINBOW, BROOK, AND BROWN TROUT
MOSQUITO CREEK	0.5	1977 1978 1982 1986	66 69 55 55	47 57 32 53	RAINBOW AND BROOK TROUT
OX SPRINGS WASH	0.3	1989	53	28	
PERRY AIKEN CREEK	1.0	1988	91	84	RAINBOW AND BROWN TROUT*
PINE CREEK	0.5	1982 1989	56 75	50 75	RAINBOW AND BROWN TROUT
ROCK CREEK	6.2	1987	42	66	
SILVER PEAK POND CREEK	1.4	1989	75	26	RAINBOW TROUT
SOUTH SIXMILE	1.5	no data	no data	no data	
TROY CANYON	1.0	1977 1982	93 87	86 87	BROOK TROUT

* Indicates unconfirmed occurrence of the species

No conflicts between livestock and Rocky Mountain elk have been documented in the Hunts Canyon Allotment which is used by wintering elk.

Conflicts between livestock and wild horse and burro populations do occur.

WILD HORSES AND BURROS

There are 16 Herd Management Areas (HMA) in the Resource Area. One additional HMA, Monitor HMA, has been identified in a previous land-use plan, however, it is proposed for deletion in this Proposed RMP (see Chapter 2 Wild Horse and Burro Determination 1 c.). The boundaries of the HMAs are shown on Maps 18 and 19. The boundaries of the herd areas were established based on the areas of use when the "Wild, Free Roaming Horse and Burro Act" became law in December 1971. Management of wild horses/burros is restricted to these areas and expansion of herd areas is prohibited under the Act.

Water availability is the main limiting factor for wild horses and burros in most of the HMAs. In some HMAs there are no federally owned water rights.

HMAs, such as Montezuma, Paymaster/Lone Mountain, and Stonewall are steep and mountainous. Water availability is poor, and the HMA boundaries are not fenced allowing horses/burros to drift out of the HMAs. Water developments are needed to encourage horses/burros to remain inside HMAs.

Burros create a nuisance for private property owners in Beatty and Springdale, especially in the summer months when range forage becomes sparse.

The Dunlap HMA was formerly managed by the Carson City District in combination with the Pilot Mountain HMA. The lead has reverted to the Tonopah Resource Area. No significant management problems exist.

In the Fish Lake Valley HMA 16,000 of the 71,000 acres in this HMA were transferred to the U.S. Forest Service under the Forest and Public Lands of Nevada Enhancement Act of 1988.

As a result of the National Forest and Public Lands of Nevada Enhancement Act of 1988, the U.S. Forest Service has management of 75,875 acres of the 104,032 acres which comprise the Little Fish lake Valley HMA.

CULTURAL RESOURCES

The Resource Area is rich in the number and diversity of cultural properties within its bounds. These properties range in age from Late Pleistocene to historic times, and contain vast amounts of information concerning the prehistory and history of the area. Some of these resources are ideally suited for public interpretation and development.

Almost all cultural inventories in the Resource Area have been project specific. As a result, portions of some hydrographic basins have been intensively surveyed for cultural resources, while others have received little or no inventory. Because a representative sample of the Resource Area has not been systematically inventoried as a basis for planning, little is known about the density and distribution of cultural resources, except in those areas that have been subjected to intensive project driven survey. Assignment of sites to management objectives is performed on an individual basis through implementation of the Section 106 process, with the result that most are managed for their information potential. Actions necessary to achieve management objectives also are determined on an individual basis. The following is a summary of cultural resources information for the Resource Area.

1. A Class I cultural resources inventory was completed in 1981. Since that time, Esmeralda County and the southern portion of Nye County have been added to the Resource Area, and considerable additional Class II and Class III survey has been performed. Consequently, the original Class I inventory is incomplete and outdated and should not be used as a basis for planning.

2. Less than two percent of the Resource Area has been inventoried for cultural resources, and the vast majority of these inventories have been driven by efforts to comply with Section 106 of the National Historic Preservation Act. In past years, cultural resources were not evaluated for potential inclusion in the National Register of Historic Places if they could be avoided by project activities. This policy has resulted in the systematic under-recording of potentially significant resources, as well as the need to resurvey and re-record sites to evaluate their National Register potential. In addition, no systematic effort has been made to consult with Native American leaders to identify sites and areas significant for their association with traditional lifeways.

Prehistoric site types known to occur within the Resource Area include, but are not limited to: long-term habitation sites, temporary camps, task specific sites, pinyon caches, scatters of heat altered rock, rock shelters, petroglyphs and pictographs, rock alignments including "geoglyphs," and quarry sites. Petroglyph sites are excellent for public interpretation objectives, but are also of importance to Native American groups.

Sensitive locations for prehistoric sites include, but are not limited to, areas near permanent and seasonal water sources, upland pinyon-juniper zones, and upper bajada slopes. During the Late Pleistocene, lakes existed within eight of the valleys in the Resource Area. During the Holocene, some of these same areas may have supported marshy environments. These lake margins and marshy areas are highly sensitive areas for cultural resources. Sites in these areas may contain valuable cultural, paleontological, and

environmental data that would provide insight into a time presently little understood by researchers.

Historic site types known to occur within the Resource Area include, but are not limited to, the remains of homesteads and mining camps, townsites, Chinese borax mines, charcoal kilns and platforms, mining/milling sites, trash dumps, trails, roads, and railroad grades. Historic sites lend themselves very well to public interpretation. Several sites within the Resource Area could be developed for interpretive purposes including: Rhyolite, Tybo-McIntyre Charcoal kilns, and the Mountain View Arrastra. Historic mining districts are generally the most sensitive areas for historic sites, but homesteads and small mining camps are found throughout the region.

Examples of sensitive sites/districts within the Resource Area include:

Rhyolite: The Rhyolite/Bullfrog townsite lies within the Bullfrog Mining District. The townsite was established in 1905, and grew to contain a population of 10,000 by 1907. Abandonment of the town began in 1908 following withdrawal of financial support for the mines. In 1924, only a single prospector inhabited the town. Rhyolite was a substantial town with numerous wood homes, and a number of buildings constructed of reinforced concrete, some as many as three stories high. In 1906, Tom Kelly constructed the now famous Bottle House. This structure was stabilized by Paramount Pictures in 1925 for use in the film "Wanderers in the Wasteland." Although the remains of other bottle houses are present in the Resource Area, the Rhyolite Bottle House is a premier example of mining town vernacular architecture and the use of bottles as a structural medium. Rhyolite is the most photographed "ghost town" in Nevada, and is visited by hundreds of U.S. and foreign tourists every year. The Friends of Rhyolite organization is actively seeking support for preservation of structures within the townsite.

Trap Springs-Gravel Bar and Stormy-Abel Prehistoric Districts: Both of these districts have tremendous potential for contributing to knowledge of the prehistory of central Nevada. There are many intact features in the Traps Springs site complex that contain large amounts of heat altered rock and charcoal in association with dense scatters of flaked stone tools and flaking debris. Although the Gravel Bar site has been seriously impacted by various developments, test excavations indicate that the site contains a buried Western Pluvial Lakes Tradition component. More intensive and extensive examination of materials from this component can be expected to contribute significant insight into this early period of occupation. Sites in the Stormy/Abel district are characterized by high densities of debris resulting from the manufacture and maintenance of stone tools. Information from these sites can be expected to contribute to our understanding of stone tool manufacture, and the special techniques that were sometimes used (e.g., heat treatment).

Tybo-McIntyre Charcoal Kilns: The Tybo charcoal kilns were constructed of rock, and are listed on the National Register of Historic Places. The McIntyre Charcoal Kilns were made from brick, and are located several miles to the west of the kilns at Tybo. Historic sites such as these are interesting to many members of the public. The charcoal kilns at these sites are in good condition, are excellent examples of kilns in the area, and therefore, are ideally suited for public interpretation purposes.

Cane Man Hill Petroglyphs: This site consists of a series of petroglyph panels scattered along a volcanic hill. The petroglyph panels at this site contain a high frequency of anthropomorphic/representational elements, an occurrence rarely observed at other rock art sites in the area. Given the high densities of some motifs, this site may be of some significance to local Native Americans.

The following sites within the Resource Area have been listed on the National Register of Historic Places:

1. The Tybo Charcoal Kilns.

2. William H. Berg House, a privately owned residence located on land managed by the BLM in the historic town of Round Mountain.

3. Goldfield: the historic district and modern townsite are on patented lands, however, some archaeological features associated

with the townsite are located on BLM administered lands.

4. Tonopah: the historic district and individual properties shown on the Register are all located on patented land.

5. Berlin Town Site: Recreation and Public Purposes Act (R&PP) to the State of Nevada.

6. Belmont Townsite.

Vandalism and illegal collection/excavation of cultural properties within the Resource Area are important concerns at this time. Resources in Railroad Valley, Fish Lake Valley, Clayton Valley, and the Silver Peak Range are being significantly impacted by illicit collection and excavation activities. In addition, thousands of artifacts have been removed from sites along Late Pleistocene lake margins. Petroglyphs have been used for target practice and charcoal kilns have been vandalized. The historic townsite of Rhyolite is continually subjected to a tremendous amount of theft and vandalism. Other resources which are known to have been vandalized/looted over the past several years include the Trap Springs/Gravel Bar and Stormy/Abel prehistoric districts, petroglyph sites in Fish Lake and Clayton Valleys, and sites in the Fish Lake Valley Salt Marsh and at Cave Spring.

Natural degradation of cultural properties is a growing concern. Petroglyphs pecked or incised into soft tuff are rapidly being eroded smooth; artifacts are being removed from primary depositional context and features are being destroyed in areas where erosion is ongoing; other sites are being destroyed during flash floods; and neglected historic structures are deteriorating through exposure to wind, water, and sun.

PALEONTOLOGICAL RESOURCES

Paleontological resources in the Resource Area are many, important and varied. Fossils are found in exposures of approximately ninety geological formations or unnamed strata. Additional fossils may be found in many other formations which occur in the Resource Area only in the subsurface. Surface exposures of geologic formations in the Resource Area containing fossils are found in sizes ranging from small isolated patches, to areas appearing continuously of discontinuously for many tens, or in some cases, hundreds of miles. A more precise description of the configuration of the surface exposures of these units can be obtained from geologic maps and geographic descriptions in the References Cited Section of this Plan. The Resource Area was the first reported locality for numerous species of animals, vertebrate as well as invertebrate, and plants. In many instances, fossils of these species have been found nowhere else on earth.

An example of an important paleoecological resource in the Resource Area is an exposure of the Esmeralda Formation exhibiting remains of a fossilized forest containing upright, lithified trees fifteen to twenty feet in height that are associated with a variety of vertebrate fossils. Unverified reports indicate that the Resource Area may also contain (or at one time contained) the world's largest petrified log, which has been described as being 14 feet in diameter and over 200 feet in length (Boak, 1934; McFarlan, 1991).

At yet another location in the Resource Area, the Siebert Formation, fossilized remains of vertebrates and invertebrates of such uniqueness and importance were found that for a number of years paleontologists established and operated a quarry at the site to aid in their extraction (Henshaw, 1942). Many previously unknown species of fossil animals have been found at this locality, and a number of publications (e.g., Henshaw, 1940), have been written about the fossils and paleoecolgical conditions that characterize this location.

The Luning Formation is exposed in some places in the Resource Area. Luning Formation exposures on Forest Service administered lands near the old town of Berlin are known to contain an abundance of fossilized vertebrates known as ichthyosaurs. Researchers from around the world have come to study the ichthyosaur remains at this site, and a state park and museum have been established for preservation and display of the fossils. As yet, ichthyosaur fossils have not been found in Luning Formation exposures on BLM administered lands in the Resource Area. However, by definition a formation contains similar lithologic characteristics throughout its areal extent, so there is a some potential that

Luning Formations exposures in the Resource Area will contain similar fossils.

Another locality in the Resource Area contains an assemblage of fossilized invertebrates of Mississippian age that is of such rarity and uniqueness that practically every species was unknown to science prior to discovery of the site (Kleinhampl and Ziony, 1985, p. 85 and 86). Other formations and localities in the Resource Area contain one or more species of fossils which, at the time of their discovery and identification, had been found nowhere else.

A Class I paleontological resources inventory for the Battle Mountain District was completed in 1987. This inventory is now incomplete and outdated. No project related paleontological surveys have been conducted in the Resource Area.

LANDS

The Resource Area was established in 1971 for the purpose of managing public lands located in central Nye County within the Battle Mountain District. From 1971 to 1983, the Resource Area included 3,616,733 acres of public land. In 1983, Resource Area boundaries were changed to include management of public lands within Esmeralda County and portions of southern Nye County. This action increased the area included within the Resource Area by 2,689,230 acres.

At present, the Resource Area includes 6,091,101 public land acres. Table 3 D depicts land status, both past and present, within the Resource Area. Over the years, 14,139.86 acres of public land within the Resource Area have been patented under various authorities. With the passage of the National Forest and Public Lands of Nevada Enhancement Act of 1988, 197,627 acres transferred to the US Forest Service. Over 98 percent of the land within the Resource Area is under Federal administration.

There are 13 rural towns and communities, five small remote settlements, and several isolated ranches within the Resource Area. Tonopah, the largest town, has a population of only about 4,000. Most of the towns in the Resource Area started as mining camps around the turn of the century or earlier. Beatty, Belmont, Goldfield, and Lida were patented under the various townsite acts. Silver Peak is located partially on a patented townsite and partially on a State land grant. Tonopah and Manhattan are built on patented mining claims. Hadley was developed on private agricultural land purchased by a mining company to house its employees. Goldpoint, Ione, and Round Mountain are located almost entirely on public land. Carvers and Dyer are primarily agricultural settlements. All of these communities are surrounded by Federal land, and most to some extent occupy public land.

TABLE 3 D
LAND STATUS

LAND STATUS	TONOPAH MFP AREA	ESMERALDA-SOUTHRN NYE RMP AREA	TOTAL ACRES	TONOPAH RMP*
BLM	3,616,733 acres	2,689,230 acres	6,305,963 acres	6,091,101 acres
U.S.F.S.	1,203,004 acres	29,450 acres	1,232,454 acres	1,430,081 acres
Private	78,720 acres	68,544 acres	147,264 acres	164,499 acres

*The National Forest and Public Lands of Nevada Enhancement Act of 1988 reduced the acreage administered by BLM by 197,627 acres and concomitantly increased the acreage administered by the Forest Service. Between 7/16/81 and 1/1/91, 3,095 acres were patented through the Tonopah MFP, and between 10/10/86 and 1/1/91, 140 acres were patented through the Esmeralda-Southern Nye RMP.

The economies of Tonopah, Beatty, Goldfield, Manhattan, Round Mountain, and Silver Peak are heavily dependent on the mining industry. This dependence traps them in boom and bust cycles reflecting trends in the minerals market. All of the communities in the Resource Area would benefit

from the stability that economic diversity provides, but few of them have any developable private land and none has the amount of developable private land needed to attract large industries.

Tonopah, Beatty, and Round Mountain are growing, and the demand for land for residential areas as well as for land for recreation and public purposes is growing with them.

Over the past few years, the demand for additional land at outlying settlements and isolated ranches has been on the increase. Also, a need to sell land for solid waste disposal sites has developed out of the BLM's increased awareness of its liability for promiscuous dumping and its consequent change in policy concerning leasing land for such sites.

During the years following the approvals of the *Tonopah MFP and the Esmeralda-Southern Nye RMP*, an aggressive land disposal program was undertaken. A total of 17,235 acres of public lands have been patented under various authorities: Color-of-Title, the Desert Land Act, the R&PP Act, the Federal Land Policy and Management Act, and the General Mining Law of 1872, as amended. It has become clear, however, that disposals of more and larger tracts need to be made available in rural Nevada.

Nineteen R&PP Leases have been issued in the Resource Area for such facilities as schools, parks, rifle and pistol ranges, and landfills. (Land is no longer available under the R&PP Act for landfills.) Land has been patented under this authority for a hospital and a museum storage vault.

Four public airport leases have been issued.

The Resource Area has also administered an active desert land entry (DLE) program. However, the failure rate in this program has been high. Although entry has been allowed on over 20 DLEs since the MFP was approved, only two have been patented.

The increase in demand for rights-of-way for roads, utility distribution lines, and, to a lesser extent, communication facilities is a clear indication of growth in the area. Over 600 rights-of-way of all types have been granted for the use of lands within the Resource Area. Most are for roads and small utility lines. There are currently about 80 communication facility rights-of-way located on the 29 developed communication sites within the Resource Area.

The Resource Area does not have many major transmission lines crossing it and has no pending applications; but, increasingly, utility companies have been examining possible routes along the two US highways which traverse the Resource Area. Crude oil from the Railroad Valley oil fields is presently trucked to refineries. Some interest has been expressed in a pipeline either going west to Bakersfield, California, or east to Caliente, Nevada.

Transportation and utility corridors are designated in the *Esmeralda-Southern Nye RMP*. These corridors included 296 miles of existing facilities and identified 30 miles of planning corridors wherein future facilities might be located. Since the RMP was approved, there have been no applications for commodity transportation or utility transmission rights-of-way within either the designated or the planning corridors. A need has been expressed for a corridor linking the substations at Millers and at Silver Peak and crossing the Silver Peak Range.

The Western Regional Corridor Study identified needed corridors traversing both planning units. Adjacent land management agencies have, for the most part, designated transportation and utility corridors which terminate abruptly in the east portion of the Resource Area. Most of the work of identifying physical limitations of the land within the Resource Area has already been done by adjacent land managers and by utility companies seeking possible right-of-way routes. A need has been expressed for a corridor from the Grant Canyon Oil Field to State Route 375.

In 1987, BLM began an intensive inventory of trespasses on the public lands. Since that inventory began, 364 suspected unauthorized uses and occupancies of the public lands within the Resource Area have been discovered.

Land classification segregates land from mineral entry and limits the uses to which the land may be put. Public lands may be classified under various authorities. Since the enactment of the Federal Land Policy and Management Act (FLPMA) in

1976, classifications within the Resource Area have been made under the authority of the R&PP Act and under the agricultural land laws.

Lands may also be withdrawn from the operation of some or all of the public land laws. Most often lands are withdrawn from mineral entry. The provisions for authorizing most withdrawals are found in Section 204 of FLPMA. Withdrawn lands may be placed under the jurisdiction of another Federal bureau, agency, or department. Appendix 11 summarizes the withdrawals and segregations of record within the Resource Area. These withdrawals are also depicted on Maps 24 and 25.

RECREATION

The Resource Area offers a wide variety of recreation opportunities such as hunting, camping, off-highway vehicle (OHV) use, hiking, photography, historical sightseeing, and OHV competitive events. This wide range of opportunities is possible because virtually all of the public lands are accessible and offer a variety of settings suitable for different recreation activities. There are no BLM developed recreation facilities in the Resource Area. Primarily dispersed recreation has dominated the area with few areas receiving regular visitor use.

Recreation Opportunity Spectrum (ROS): The BLM has adopted a system called the Recreation Opportunity Spectrum (see Appendix 12 for a description of the five settings). This system provides a method of identifying recreation opportunities available on the public lands and a means to plan for the long-term maintenance of the required settings.

For this RMP, the different settings available on public lands in the Resource Area were identified. The settings were formulated using factors such as remoteness, size, amount of landscape change and development, the evidence of other people, and the degree of management control. There are 90,370 acres with a primitive setting; 339,120 acres with a semi-primitive non-motorized setting; 465,725 acres with a semi-primitive motorized setting; 5,035,686 acres with a roaded natural setting; and 160,200 acres with a rural setting (see Maps 28 and 29).

Special Recreation Management Areas: There are no Special Recreation Management Areas (SRMAs) within the Resource Area. Recreation management has primarily consisted of maintaining the minimum management and visitor services necessary within the Tonopah Extensive Recreation Management Area (ERMA).

Although dispersed recreation is the rule in central Nevada, several undeveloped areas have become commonly used for overnight camping, fishing, day hiking, and picnicking.

Off-Highway Vehicles: The primary recreation activity is OHV use. This includes a wide range of vehicles from standard highway vehicles to motorcycles, and four-wheel drive trucks, to dune buggies, and sand racers. Currently, most of the Resource Area is open to OHV travel with only limited restrictions.

There are several annual competitive OHV events within the Resource Area. Indications are that the number would increase over the next several years due to continuing restrictions on such events in areas with desert tortoise and other resources requiring protection. Conflicts exist over event routes, reclamation, contact with private property, and management of associated resources and resource users. The existence of these conflicts necessitates race course requirements and standards.

Extensive Recreation: The Resource Area has a broad array of dispersed recreation activities (see Table 3 E). The lack of recreation development in central Nevada can be most closely linked to the lack of a sizeable population source within driving distance to take advantage of day-length activities. Also, related to populations, is the lack of information available to the general public concerning recreation in the desert. In general, central Nevada is viewed as a place to be driven through, not to, as there are no destination points favoring popular interest. Destination points adjacent to the Resource Area (Death Valley National Monument, The White Mountains) and those found nearby (Las Vegas, Great Basin National Park, Reno) provide considerable traffic flow through the area. The development of several "day trip" recreation sites coupled with public information concerning their existence,

could result in a sizable increase in use of public lands within the Resource Area.

The greatest strength of the Resource Areas recreation program is its dispersed nature. The area is open to the public to pursue whatever activities the resources would permit with a lack of regulative restrictions, close confinement to other users, or limitations on movement. As these qualities are becoming more unique nation-wide, their retention should be emphasized in Tonopah Resource Area's recreation development. Numerous small areas could be developed which would provide impetus to stop and explore, but would not concentrate use, thereby retaining the better qualities of recreation which the Resource Area can provide.

The road network of the Resource Area is extensive. However, most of the roads are unpaved, minimally maintained, and are susceptible to climate related damage making them impassable. To reach many of the undeveloped recreation areas currently existing in the Resource Area, one must drive a high-clearance vehicle.

Most of the visitors to the ERMA are probably local residents; however, more nonresidents would take advantage of the wildlife observation opportunities once this aspect is known. The following unique areas in the Tonopah ERMA are discussed in terms of their recreational opportunity and possible designation as SRMAs.

There are several areas where the presence of high quality natural resources and current or potential demand warrants intensive management practices to protect the areas for their scientific, educational, and/or recreational values.

1. Railroad Valley

   Railroad Valley is located in central Nevada approximately 70 miles south of Ely and 100 miles east of Tonopah along U.S. Highway 6. Formerly a U.S. Fish and Wildlife Service Refuge, it is one of the BLM's few sizeable riparian areas in Nevada. A 1968 Public Land Order reduced the size of the area to 14,720 acres, which includes most of the riparian habitat in Railroad Valley. This area is probably the best area in central Nevada for observing and photographing waterbirds, particularly during migrations. The area was developed by constructing dikes and spillways to create pond areas and taking advantage of two artesian wells. The area is an excellent waterfowl area which is not achieving its potential because of the deteriorated condition of the ponds. The area was formerly a largemouth bass and bluegill fishery. Waterfowl hunting is an uncommon activity in central Nevada. The area is managed according to an agreement with the Nevada Division of Wildlife.

2. Lunar Crater

   Located along U.S. Highway 6 approximately 80 miles east of Tonopah, the area encompasses a volcanic field of 39,680 acres. There are 2,560 acres already recognized as a National Natural Landmark. Some of the more important features include: Lunar Crater and Easy Chair Crater, both maar craters, and Black Rock Lava Flow, an ancient flow coming out of the collapsed side of a volcanic crater. Nearby is The Wall, a 20 mile long palisade area with a spectacular vista. In a report prepared for the National Aeronautics and Space Administration, Lunar Crater was noted as being very similar to the craters on the moon. While a very unique area, it has received little use by the public. A few hunters camp in the area and there are occasional sightseers.

3. Sand Dunes Areas

   The Resource Area has two sand dune areas that are known to be used by dune buggy enthusiasts. These are the Crescent Dunes about 15 miles northwest of Tonopah, and Clayton Valley Dunes, about 10 miles southeast of Silver Peak. Both are similar areas, having several "peaks" which are several hundred feet in height and having one very steep side. Crescent Dunes is easily accessible and well known to the public.

TABLE 3 E
DISPERSED RECREATION ACTIVITIES OCCURRING IN ESMERALDA AND NYE COUNTIES[1]

ACTIVITY	PERCENT POPULATION PARTICIPATING	PARTICIPATION PER PERSON[2] (DAYS PER PERSON PER YEAR)	TOTAL PARTICIPATION DAYS[3]
Rock Hounding	22.6	2	5,001
Horseback riding	18.4	2	4,027
Off-Highway Vehicles	12.0	19	25,228
Photography	10.6	8	9,383
Hunting	10.4	19	21,864
Primitive Camping	9.7	2	1,073
Sightseeing[4]	9.2	14	14,252
Exploring	8.4	14	13,012
Fishing	5.7	4	2,523
Shooting	4.8	2	1,062
Hiking-Back Packing	3.4	4	1,505
Boating	3.3	1	365
			99,340

1 Information from Nevada State Senate Bill 40, 1983
2 Local survey
3 These figures are based on the following calculation: (participation per person) x (population) x (Percent population participating). The population is based on the 1990 census: northern Nye Co. 9,722 + Esmeralda Co. 1,343 = 11,065.
4 Does not include sightseeing by vehicles transiting the Resource Area on major U. S. highways or State routes.

WILDERNESS

All lands under wilderness review (WSAs) must be managed under the Interim Management Policy (IMP) guidelines until either designated as wilderness or released for multiple-use management by Congress (see Maps 26 and 27). Once final designation or release of the WSAs has been completed, those areas designated for wilderness would be managed under the appropriate laws, regulations, and policies while those lands released for multiple use management would be managed in conjunction with all pertinent laws, regulations, and policies for multiple-use public lands.

Many of the WSAs were initially selected for study based on their roadless, primitive character.

In reintroducing WSA lands to multiple-use management, the decision on whether to retain the wilderness qualities would determine management direction. A Recreation Opportunities Survey (ROS) was prepared for the Resource Area and is used to evaluate motorized and non-motorized potentials within the WSAs (Table 3 F).

TABLE 3 F
LAND STATUS

Semi-Primitive Motorized	Semi-Primitive Non-Motorized	Primitive	Total
268,385 acres	245,385 acres	90,370 acres	604,535 acres

ROS categories are described in Appendix 12 and shown on Maps 28 and 29.

FLUID MINERALS

Public lands are available for oil and gas leasing or geothermal leasing after they have been evaluated through BLM's multiple use planning process. In areas where development of resources would conflict with protection or management of other land uses, mitigating measures are developed.

Existing fluid mineral leasing categories, based on previous planning, are shown on Table 3 G.

Oil and Gas

As of December, 1990, 185 wells have been drilled in an area covering approximately 450 square miles. Since 1977, 126 wells have been drilled, indicating that industry interest in Railroad Valley continues to expand. Although exploratory wells have been drilled in Fish Lake Valley, Big Smoky Valley, Stone Cabin Valley, Hot Creek Valley, and Railroad Valley, to date oil and gas development in the Resource Area is limited to Railroad Valley. This Valley is considered to be a wildcat area and much of the drilling which has occurred is associated with exploration units. Forty-four exploration units, averaging 14,000 acres in size, have been approved for operations in Railroad Valley. As many as 14 units have been approved in one year.

The nature of the resource in Railroad Valley has led exploration drilling to follow a very dispersed pattern. Of the 160 wells drilled, 96 have been drilled outside of field areas. The spacing of these wells ranges from one per square mile to one per thirty square miles. The extremely complex geologic structure of the area has limited the success rate of wells to approximately 28 percent. Even within the defined fields the success rate is only 60 percent.

Seven producing fields have been discovered in Railroad Valley. Eagle Springs began production in 1954 when the first producing oil well in the State, Shell Eagle Springs Unit No. 1-35, was completed. The second discovery did not occur until 1976 when Northwest Exploration Trap Springs No. 1 was completed. Since the Trap Springs discovery, a new field has been discovered every two to three years. Production from the six active fields currently producing oil in Railroad Valley exceeds three million barrels per year. The Kate Springs Field is the only field producing natural gas. The Grant Canyon Field, which went into production in 1983, contributes approximately 85 percent of the total production. This field contains one well, Grant Canyon #4, which at one time had the highest production rate of any free flowing onshore well in the U.S. Estimates of recoverable reserves from each producing oil field vary from four to thirteen million barrels. Over 25 years, production from Eagle Springs amounts to 95 percent of estimated reserves. The Grant Canyon and Trap Spring Fields have produced approximately 55 percent of estimated reserves. Production from both the Eagle Springs and Trap Spring fields began to decline in 1978. The fields are located as close as one mile apart and as far away as 12 miles from each other. The number of production wells per field ranges from one to thirty-nine. The wells have been drilled on 40 or 160-acre spacing, depending on reservoir depth. Currently forty-eight wells in Railroad Valley are producing oil, 15 are shut in, eight are temporarily abandoned, and six are water disposal wells. Production varies from 10 to 400 barrels of oil per day per well. Cumulative production from all fields through June of 1990 is 26,541,465 barrels of oil.

Much of the crude oil produced in Railroad Valley is processed at the Railroad Valley refinery. Products include diesel, kerosene, naphtha and asphaltic bases. Crude oil residue or residual from the refinery is currently burned at the Sierra Pacific Power Plant on Interstate 80 outside of Reno, at Tracy, NV. Crude oil is also trucked to Salt Lake City, Utah, and to Bakersfield, California. Petro Source does not purchase all of the oil produced in the Valley. In early 1990 the company purchased the Tonopah Refinery. This facility is used for oil storage and refining for the spot market. The changing oil distribution system in Salt Lake City and other western locations strongly influences the economics of produced oil (1990 prices to ship via truck were $4/barrel to Salt Lake City and $8 per barrel to Bakersfield, CA.). The product is shipped out of state for distribution, as well as being utilized in state. The natural gas produced in the Kate Springs Field is currently being flared.

Current oil and gas leases held in Nye County totals 1,052 leases covering 2,165,964 acres. No

TABLE 3 G
AVAILABILITY OF LANDS FOR MINERAL LEASING RELATIVE TO RESOURCE POTENTIAL[1]

MANAGEMENT CATEGORIES	LOW POTENTIAL ACRES	MODERATE POTENTIAL ACRES	HIGH POTENTIAL ACRES	UNKNOWN POTENTIAL ACRES	TOTAL ACRES
OPEN SUBJECT TO STANDARD TERMS AND CONDITIONS	374,140	1,228,980	500,830	3,861,062	5,965,012
OPEN WITH MAJOR RESTRICTIONS (NO SURFACE OCCUPANCY)	0	18,740	24,590	7,095	50,425
OPEN WITH MINOR RESTRICTIONS (SEASONAL RESTRICTIONS)	0	30,680	480	41,240	72,400
CLOSED TO LEASING (DIS-CRETIONARY)	0	0	0	0	0
CLOSED TO LEASING (NONDIS-CRETIONARY) [1]	0	2,560	0	704	3,264

[1] Assumes that lands in Wilderness Study Area status would be returned to multiple use.

leases were held in Esmeralda County as of December, 1990.

Calculation of oil and gas potential is shown on Maps 32 and 33, and summarized on Table 3 H.

Geothermal Resources

The development of geothermal resources is governed by the Geothermal Steam Act of 1970, as amended. The resources that can be developed include: geothermal steam, hot water, hot brine and heat found in geothermal formations. Lands that have known value are referred to as Known Geothermal Resource Areas (KGRAs). These areas must be leased competitively. All other lands can be offered non-competitively. Geothermal resource potentials are shown on Maps 32 and 33 and summarized on Table 3 I. There are 48 locations of hot or warm water in Nye County, and 17 locations in the Esmeralda County. Hot water is defined for these purposes as water greater than 50°C, and warm waters from 20°C to 50°C.

Within the Resource Area there are currently only two KGRAs identified. These are located at Round Mountain and in Fish Lake Valley. Development of geothermal resources since 1981 has centered in these areas.

The Round Mountain KGRA has been developed by Round Mountain Gold Corporation. The geothermal energy is used to preheat leach solutions in the winter for the Round Mountain Gold Mine. The operation utilizes three production wells, two injection wells and a heat exchanger. The preheat operation normally runs from October to April.

The second KGRA is located at the north end of Fish Lake Valley. Extensive testing between 1980 and 1985 was undertaken to determine temperature gradients and potential production zones. This work culminated in two production wells being drilled and flow tested. BLM permitted a 5-megawatt (MW) power plant in 1987. The sale of 16 megawatts of power has been contracted to Southern California Edison. The first sale of power is scheduled for 1995. The potential resource and market exists for two additional 15 to 20 MW plants to be on line or under construction by 2000.

Darroughs Hot Springs in Smoky Valley has been drilled and flow tested, but no power plant has

ever been proposed. The area is private land and contains a small bath house development.

In 1986 and 1987 a private company attempted to develop a vegetable drying plant in southern Railroad Valley. This project was unsuccessful, however, since the water temperatures were marginal for exploitation.

LOCATABLE MINERALS

The locatable minerals industry has historically been, and continues to be, a major industry in the Resource Area. Minerals produced include: copper, molybdenum, gold, silver, lithium, fluorspar, bentonite clay, diatomaceous earth, mercury, and turquoise. In 1990 the total employment in the Resource Area from mining was 1,879 people (State Mine Inspector figures). This total does not include smaller operations which employ only one or two people. The gross mineral value produced in the Resource Area in Fiscal Year 1990 exceeded 350 million dollars.

Locatable mineral potential is depicted on Maps 36 and 37 and the acreage is shown on Table 3 J.

The sources of this information include professional geologic knowledge, past production records, professional contacts, geologic reports, and BLM exploration records. Mineral exploration associated with the mining industry increased steadily from 1981 - 1990. In spite of a minor drop in plans and notices received in 1991, Tonopah still ranks as one of the most active Resource Areas for mineral exploration and development in Nevada. This activity ranges from the large exploration company doing a multiple drill hole program to the small operator and prospector completing yearly assessment work. It is anticipated the trend toward heavy mineral activity will continue. There are 65 mining districts with a history of production in the Resource Area. There are 15 large mines currently producing in the Resource Area.

MINERAL MATERIALS

A variety of mineral materials are present in the Resource Area including sand and gravel, cinders, basalt, and decorative rock. The greatest demand is for sand and gravel which are used primarily by Nevada Department of Transportation and county road departments for the construction and maintenance of roads. An increasing demand for decorative stone also is occurring. The historic demand for sand and gravel has averaged 17 contracts and 139,546 cubic yards over the last 10 years. Current demand for sand and gravel is being easily met. Although future demand is unknown, there is a high probability that the demand can be met since over half of the Resource Area has potential for production (3,629,800 acres).

Current demand for cinders, basalt and decorative landscaping rock is being met. However, these materials are not so prevalent in the Resource Area as are sand and gravel. A demand for large (100,000 plus tons) sales would quickly deplete current collection areas and quarries.

NON-ENERGY LEASABLE MINERALS

Non-energy leasable minerals in the Resource Area include phosphate, sodium and potassium. Such leases exist in Clayton Valley and in Railroad Valley. Although leases for non-energy minerals are active in Clayton Valley and Railroad Valley, current sodium and potassium salt production is limited to Clayton Valley. These deposits are located in the playas. There are 864,400 acres with potential sodium and potassium .

The level of exploration for non-energy leasable minerals has been low. Only one prospecting permit has been issued in the last five years. However, with over 864,400 acres of the Resource Area having potential for production of sodium and potassium, future development is likely.

FIRE MANAGEMENT

The incidence of wildfires within the Resource Area is generally low. A majority of those fires reported in the Resource Area over the last 10 years have been in Size Class A (0.25 acres or less). During the last 20 years, there has not been a fire larger than 1,200 acres.

Fire Management Policy and Procedures within the Resource Area are guided by the Battle Mountain District Fire Management Activity Plan (FMAP).

There is little potential for fire to enhance or inhibit the ability to achieve resource objectives. The only potential to enhance the ability to achieve resource objectives would be in habitat management (principally conversion from pinyon-juniper woodlands), and watershed improvements

TABLE 3 H
OIL AND GAS POTENTIAL (Acres)

POTENTIAL	ACREAGE
High	525,900
Moderate	1,278,400
Low	380,800
None	3,906,001

TABLE 3 I
GEOTHERMAL RESOURCES POTENTIAL

POTENTIAL	ACREAGE
High	11,200
Moderate	316,870
Low	300,841
Unknown	5,462,191

TABLE 3 J
LOCATABLE MINERAL POTENTIAL

POTENTIAL	ACREAGE
High	726,100
Moderate	2,050,000
Low	3,315,001

(principally conversion from big sage communities). However, these opportunities are limited due to low fuel quantity and the noncontinuous nature of the fuels.

The site potential, as described by the Soil Conservation Service Range Site Guides, for much of the area do not indicate sufficient fuel loading and continuity to allow widespread use of fire.

The Battle Mountain District FMAP separated the district into two fire zones (see Maps 38 and 39). These zones include areas with similar fire behavior based upon vegetative and topographical features. The zones are briefly described below.

1. Fire Management Zone 1.

Fuel types are annual and perennial grasses, with widely scattered shrubs. This zone is generally situated in the valley floors up to the mid slopes within the Resource Area.

2. Fire Management Zone 2.

This fuel type is generally big sage and grasses at its lower extremities, changing to pinyon-juniper at the higher elevations. This zone is generally situated at mid-slope up the mountain peaks.

Fires in both zones are generally small and of low intensity. The size is usually limited by the lack of continuity in the fuels. This lack of fuels to carry a fire also severely limits the use of prescribed fires.

SOCIAL AND ECONOMIC CONDITIONS

Because of the manner in which data is organized and made available, the affected environment, for purposes of social and economic analysis, must necessarily be defined to include all of Nye and Esmeralda Counties. Analysis of potential effects must also be inferred from county-wide data.

Population and Area

Table 3 K displays 1980 and 1990 decennial population benchmarks and population forecasts for the year 1995 for the two counties and the State. Both counties remain rural and sparsely populated; yet, in relative terms, have experienced extraordinary growth. Nye leads the state, with a population increase of 96.5 percent, and Esmeralda ranks third, with a 73.0 percent population growth between 1980 and 1990. Nye is the largest county in the state, with a total area of 18,147.2 square miles. Population density for Nye County is about 1.0 persons per square mile. About half of the population of Nye resides in the southern portion of the county, outside of the Resource Area.

Population density in Esmeralda County, encompassing a land area of 3,588.7 square miles, is estimated at 0.4 persons per square mile.

Income and Employment

Tables 3 L and 3 M show earnings and employment, by major industries, in 1989 for both counties. The service industries are the single most important employers and income producers for Nye County, providing 58.3 percent of county employment and 62.2 percent of industrial income. Mining provides the bulk of the balance of employment and income, with 1,909 jobs (14.7 percent) generating $76.8 million in income (18.9 percent of total county income). The predominance of service industries is explained primarily by civilian employment for private firms providing contractual services to the Nevada Test Site. All other industrial activity in Nye County accounts for the remaining 27 percent of employment and 18.9 percent of income generated by industry. Agriculture provides 195 jobs and $1.8 million in income.

For Esmeralda County, a comparatively much smaller economy, the minerals industry predominates, providing 33.6 percent of employment and producing 43.3 percent of industrial income. Agriculture is the second most important generator of income for Esmeralda County, at $2.6 million, or 19.1 percent.

Agriculture, is only 5th ranked in employment, however, at 12.2 percent. Government is the county's second most important employer, providing 107 jobs, or 20.8 percent of county employment. But government generated income represents only 12.8 percent of the county total. Mining, agriculture, and government, together with construction, account for almost 92 percent of earnings and about 82 percent of employment in Esmeralda County.

Unemployment rates reported by county, for May, 1991, were 5.1 percent for Esmeralda, and 5.5 percent for Nye. The Nevada State average was 5.8 percent at that time. Rates reported for May, 1992 show unemployment increasing significantly in Esmeralda County up to 11.7 percent, while Nye declined to 5.2 percent, and the Nevada State average remained approximately stable at 5.7 percent.

The significant increase in the unemployment rate for Esmeralda County underscores the importance of mining in the county economy. A general cessation of gold mining and production in the county has been precipitated by the continuing downward trend in the international price of gold.

Annual per capita income figures for 1989 show Esmeralda ($22,419) to be the second highest in the state; reflective of mineral industry wage levels. Nye County, with a per capita personal income estimated at $15,967 is below the average of $18,989 for the State's 17 counties.

Social Setting, Attitudes, and Values

An analysis of social attitudes, expectations, and lifestyles was conducted for the *Final Environmental Statement for the Proposed Public Land Withdrawal, Nellis Air Force Bombing Range Nye, Clark and Lincoln Counties, Nevada* (U.S. DOI, BLM/USAF, 1981). Additional Social-

Economic Profiles have been prepared by BLM and from these sources it may be concluded that the majority of residents are pleased with their communities and lifestyles. The more rural residents are, however, less tolerant of outside influence in their lives.

TABLE 3 K
AFFECTED AREA POPULATION AND PROJECTIONS

LOCATION	1980	1990	PERCENT CHANGE 1980-1990	1995 PRELIMINARY FORECAST
Esmeralda County	777	1,344	73.0	1,370
Nye County	9,048	17,781	96.5	20,400
State of Nevada	800,508	1,201,833	50.1	1,581,540

(Source: 1980 and 1990 U.S. Department of Commerce, Bureau of the Census; 1995 Preliminary Forecast, Department of Administration, State of Nevada.)

TABLE 3 L
ESMERALDA AND NYE COUNTIES, 1989; EARNINGS BY MAJOR INDUSTRIES

INDUSTRY	ESMERALDA	PERCENT	NYE	PERCENT
Agriculture	2,645	19.1	1,837	0.5
Mining	5,993	43.3	76,843	18.9
Construction	2,319	16.7	19,624	4.8
Manufacturing	0	0	1,739	0.4
Wholesale Trade	(1)	(1)	1,120	0.3
Retail Trade	549	4.0	10,491	2.6
Services	314	2.3	252,395	62.2
Government	1,768	12.8	26,215	6.5
Other	255	1.8	15,522	3.8
Total	13,843	100.0	405,786	100.0

(Source: U.S. Department of Commerce, Bureau of Economic Analysis, Regional Economic Information System, April 1991.) Earnings include wages and salaries, other labor income, and proprietor income. Earnings represent the principal component of total income which is further comprised of dividends, interest, rent, and transfer payments, less personal contributions for social insurance.

(1) Not shown to avoid disclosure of confidential information. Figures are included in "other."

TABLE 3 M
ESMERALDA AND NYE COUNTIES, 1989; EMPLOYMENT BY MAJOR INDUSTRIES

INDUSTRY	ESMERALDA	PERCENT	NYE	PERCENT
Agriculture	63	12.2	195	1.5
Mining	173	33.6	1,909	14.7
Construction	78	15.2	581	4.4
Manufacturing	0	0	130	1.0
Wholesale Trade	(1)	(1)	37	0.3
Retail Trade	71	13.8	805	6.2
Services	11	2.1	7,571	58.3
Government	107	20.8	1,111	8.6
Other	12	2.3	653	5.0
Total	515	100.0	12,992	100.0

(Source: U.S. Department of Commerce, Bureau of Economic Analysis, Regional Economic Information System, April 1991.)

(1) Not shown to avoid disclosure of confidential information. Figures are included in "other."

Residents strongly value quality educational opportunities for their children, family life, friendship, personal honesty, and trust. Personal independence, responsibility, and self-reliance are particularly prized virtues. Economic development,industrial growth, and community expansion are favored, while personal status and environmental concerns receive less emphasis.

Positive community attributes include such factors as (1) a good place to raise a family, (2) recreational opportunities, (3) and the quality of the physical environment. The lack of adequate hospital and medical care are the principal concerns of the rural area inhabitants.

The Federal Government represents a significant presence in these two counties, as illustrated by land ownership data. Almost 99 percent of the land area in Esmeralda County (approximately 2,257,689 acres) are under Federal ownership. Federal land ownership in Nye amounts to 11,560,960 acres, or almost 93 percent of the land within that county.

The Nellis Air Force Base and Range and the Nevada Test Site represent the most visible presence of the Federal Government. Local resident interest and concern is also directed toward Federal management of the lands for mining, livestock grazing, wildlife and wild horse management, wilderness, land tenure and utility corridors.

Income and employment opportunities afforded by the military presence are generally perceived as favorable, even necessary. Concern about aircraft noise, sonic booms, range contamination from unexploded ordnance, radioactivity, seismicity, and potential range fires has been expressed by residents of the study area. A full discussion of these concerns may be found in the *Final Environmental Statement for the Proposed Public Land Withdrawal, Nellis Air Force Bombing Range, Nye, Clark and Lincoln Counties, Nevada* (U.S. DOI, BLM/USAF, 1981).

Residents of both counties express strong interest in mining, livestock grazing, wild horse management and wilderness issues. Wildlife and land tenure, particularly lands available for community expansion and utility corridors have proven, in the past, to generate concern in both urban and rural areas throughout the counties.

Affected Sectors

Livestock-oriented agriculture and mining are the major basic industries that could be potentially affected by management proposals. Future livestock grazing and mining activities could be affected by constraints and prescriptions to protect wildlife; land disposal proposals; and the designation of utility corridors.

Agriculture

Agricultural production in the RMP area consists of cattle and hay. Cash receipts from marketings in 1989 totaled $4.8 million in Esmeralda County, with $2.0 million from livestock and livestock products, and $2.8 million from crops. Total farm labor and proprietors income, for Esmeralda County, is estimated at $2.6 million.

Nye County cash receipts totaled $5.0 million, in 1989, with $3.0 million from livestock and $2.0 million from crops. Farm labor and proprietor's income totaled approximately $1.8 million.

Agriculture accounts for 19.1 percent of total labor and proprietors income in Esmeralda County, and provides 12.2 percent of total employment. The majority of agricultural production occurs in Fish Lake Valley.

While of lesser significance to the Nye County economy, providing only 0.5 percent of total income and only 1.5 percent of total employment, agriculture in Nye County retains its importance in public perceptions as a principal, stabilizing, basic industry.

Little indirect income is generated by agricultural purchases within either of the counties. Most farm implements and equipment are purchased outside of the counties, primarily in Bishop, California.

Livestock have been using an average of 167,102 AUMs of public land forage in the Resource Area, with 29 active permittees on 34 grazing allotments. Net ranch income is estimated at $5.25 per AUM.

Historically, the economic benefits derived by area ranchers from the use of public range have exceeded the fees they are charged. The existence of this imbalance, or "consumer surplus," has meant that ranchers are willing to pay extra for the opportunity to use public lands, thereby causing the grazing permit to acquire a market value (Vale, 1979; Neilson and Workman, 1971). The permits can be bought or sold in the market place, or used as collateral for loans (Corbett, 1978). Although not officially recognized as real property, BLM permits have nonetheless become an integral element in the capital and credit structure of area ranchers. Currently, the market value of a Federal AUM is estimated at $50 in the region. At an average market value of $50 per AUM, BLM grazing privileges contribute $8.4 million to the wealth of area ranchers.

Mining

Providing 33.6 percent of total employment and producing 43.3 percent of total income in the county, mining looms large in significance in the economy of Esmeralda County. In boom times, it is the largest income producing industry, and dominates economic activity. While of lesser relative significance in Nye County, mining activities there, too, provide a major contribution to economic well-being.

Mining represents the second largest income producing industry in Nye County, providing $76,843,000 in personal income, or 18.9 percent of total county earnings in 1989. And, in 1989, the minerals industry was also the second most important employer in the county, with 1,909 jobs.

Assessed valuation for net proceeds of mines for 1988-1989, amounted to $129.6 million in Nye County, and $12.1 million for Esmeralda. Assessed value of mining property totaled $55.9 million in Nye and approximately $9 million in Esmeralda County. Taken together, these assessments yielded slightly more than $3 million in tax revenues for Nye County and $437,000 for Esmeralda County.

Lands

Potential changes in the proportionality between public and private lands could affect both the tax base and BLM payments to the counties in lieu of property taxes. Assessed valuation for Esmeralda and Nye Counties in the fiscal year 1988-89 amounted to $33,109,214 and $320,737,641 with tax rates per $100 of assessed valuation at 2.0871 and 1.6182 respectively. BLM payments in lieu of property taxes for fiscal year 1989 amounted to $65,000 for Esmeralda County and $472,000 for Nye County.

Corridors

The designation of corridors would enable more efficient planning of future energy, communication, and transportation facilities. The lack of designated corridors sustains high planning costs to utility companies and results in longer processing time for right-of-way applications. However, utility construction and operating costs can be minimized since there are no designated corridors and no restriction of opportunities to develop the shortest right-of-way possible.

Recreation

Expenditures for recreation in the planning area contribute to the regional economy through the purchase of lodging, services, equipment, fuel, and food. Public land resources that are associated with recreation and affected by this plan include wildlife, wild horses and burros, wilderness, lands, and riparian areas.

Current participation in hunting, fishing, and other dispersed recreation, is estimated at 99,340 days (see Table 3 F). Expenditures in the local economy, deriving from these recreation activities, are estimated at a total of $2,351,000, in 1990. This expenditure level provides about $695,900 in income, and generates about 60 jobs in the local economy.

Some wildlife population adjustments may be expected as a result of alteration of habitat condition, or changes in the amount of vegetation available for fish and wildlife. Adjustments in fish and wildlife populations, either increasing or decreasing, would (in the long-term) influence the number of hunter and angler days, thereby affecting changes in expenditures, income, and employment.

Limitations and restrictions on OHV use are not likely to have an effect on local recreation expenditures. While it is most likely that both formal and informal OHV use would be effectively accommodated within the alternative proposals, vehicle-dependent recreation which may be excluded or restricted in certain areas would not simply cease to occur but instead, would be displaced to adjacent public land areas.

While public lands recreation activities do contribute, in some measure, to the local economy, any potential gains or losses would not be of sufficient magnitude to have any significant impact. Recreation expenditures will not, therefore, be considered further in the impact analysis.

Neither OHV designations, nor adjustments in wildlife populations will produce a measurable difference. A more significant effect will result from continued growth in population or tourism in the area. As such growth may reasonably be expected, we may also expect public land recreation and recreation-associated expenditures to continue to increase in the RMP area.

Forest Products

Forest products harvested from the public lands in the RMP area, in 1990, included 706 cords of firewood, 785 Christmas trees, two wild plants, 14 cacti, 66 Joshua trees, and five pounds of pinyon pine nuts. These products provided $8,014 to BLM in permit sales. Based on fair market values, the benefit to permit holders is estimated at about $89,300.

While of great benefit to local consumers, harvesting and sales of woodland products from lands managed by the BLM are of little significance in the local economy. Permit sales and harvesting of forest products will not be significantly affected by any proposed management actions and will not be further considered in the economic analysis.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter discusses the environmental impacts in terms of change which could occur over the next 20 years through implementation of the Proposed RMP described in Chapter 2.

The following assumptions were used by the interdisciplinary team in determining impacts:

1) funding and personnel would be sufficient to implement any alternative described in Chapter 2.

2) impacts shown are expected to occur during the 20-year life of the plan.

3) BLM would adhere to all Bureau wide requirements and standard operating procedures providing for protection of the environment.

4) trends in resource use would be as follows:

a) transmission line corridors would be needed to transmit energy through the Resource Area.

b) the demand for organized or competitive off highway vehicle events would increase in the Resource Area.

c) mineral exploration and development would continue at approximately the same rate as in the past.

d) developments associated with land use authorizations and ownership adjustments would increase as the population increases.

e) levels of forage use by livestock, wildlife, and wild horses and burros continue to be determined in accordance with BLM's ongoing monitoring and evaluation policy.

5) short term impacts would last five years or less; long term impacts would last for more than five years.

IMPACTS TO AIR RESOURCES

From recreation:

Air quality would be degraded by fugitive dust released during off-highway vehicle events. Impacts would be of short duration.

From mineral exploration and development:

Air quality may be degraded during construction and mining activities as a result of vehicular emissions and fugitive dust. State standards for particulates may be exceeded for short time periods on some project sites but should not be exceeded Resource Area-wide. Mitigating measures are applied for dust and emission abatement. Reclamation is designed to restore the long term productivity of the resources.

IMPACTS TO WATERSHED

From riparian management:

Managing for proper functioning condition on 32.8 miles, shown in Table 3 C, of streams, streamside riparian areas, springs, seeps, wet meadows and other riparian areas in the Resource Area would reduce sedimentation.

From livestock grazing management:

The implementation of grazing management would increase ground cover and reduce erosion rates.

Rangeland improvements, such as fences and water developments, destroy small amounts of vegetative cover during construction. This activity would increase soil erosion on approximately 1,025 acres in the short term and 167 acres would remain denuded in the long term.

Vegetative manipulation projects on 42,460 acres would increase soil erosion during and shortly after treatment. Two years after reseeding, erosion rates would be less than current levels.

From forestry and vegetative products:

Firewood harvesting would destroy vegetation and disturb the soil resulting in a short term increase in erosion. As the understory vegetation is released from competition with overstory trees, ground cover would increase and soil erosion would be reduced in the long term.

From mineral exploration and development:

Waters found in oil and/or gas producing formations are part of a closed system and will not impact the general ground water of the region. The oil and gas industry must comply with standards to ensure reinjection of produced waters does not degrade ground water aquifers.

There would be a short term loss of soil cover, and a subsequent increase in erosion potential. Soil compaction would occur wherever vehicular use is concentrated. Most long term impacts would be reduced or eliminated by minimizing disturbed areas, using best available construction techniques, by mitigating disturbance through soil stabilization and revegetation.

Long term impacts would occur on 3,900 acres of open pit mining which would not be revegetated.

IMPACTS TO VEGETATION

From vegetation management:

Managing for desired plant communities would provide for a balanced production of forage for wildlife, livestock and wild horses and burros and for watershed protection. In the short term these improvements would generally occur on the more productive sites, first, with the less productive sites showing slower progress. Long term impacts would be increased biological diversity, biomass, cover, ecological status and production, and a decrease in erosion.

From forestry and vegetative products:

Firewood harvesting of both green and dead wood would have a negative impact on vegetation in the short term. These impacts are the destruction of live trees, the crushing and trampling of understory vegetation and a possible increase in erosion potential. However, harvesting pinyon-juniper trees would release the understory vegetation from competition with trees. Biological diversity, production and ground cover would increase. This causes an increase in available forage and a decrease in soil erosion. Harvesting trees would cause minimal impact on pine nut production. There are 314,000 acres of pinyon-juniper woodland in the Resource Area, about 11,850 acres (four percent of the total pinyon-juniper woodlands) could be cut during the life of this RMP. Firewood cutting areas are not clearcut because one-third of the trees on these areas are too small for firewood. The tree canopy cover would not be reduced below 10 percent in wood cutting areas.

Of the 231,000 acres which support Joshua trees, 131,000 acres would be open to non-commercial harvest. Harvest would not exceed the

sustained yield. There would be little impact on the Joshua tree population, or on adjacent vegetation.

There is a small demand for desert shrubs. Collection of live desert shrubs should have little effect on vegetation. The entire Resource Area would be available for harvest of common desert plants. Since authorizations are discretionary and subject to environmental reviews no noticeable impacts to vegetation are anticipated.

From rangeland improvements:

The largest impact to vegetation from any range improvement project would be from vegetative manipulation of 42,460 acres. Short term impacts would be a loss of existing vegetative cover and biomass. Once established the seeding itself would mitigate these impacts. The long term effect of seedings would be to diversify vegetation and increase forage production.

The short term impacts of developing wells, pipelines, fences, re[illegible]s, and springs would be to disturb 1,052 acres of vegetation cover. Because the disturbance would be scattered over a large area, the short term impact would be insignificant. The long term effect of these projects would be to improve distribution and control of livestock which would cause an increase of vegetative biodiversity, production, and ecological status.

From livestock grazing management:

Vegetation conditions would improve as more intensive management is implemented. Short term impacts would be small increases in plant vigor, litter, production, and seedling establishment. Long term impacts include larger increases in plant vigor, litter, production and seedling establishment, plus an increase in biodiversity, ecological status, plant density, palatable shrubs, and cool season grasses. Impacts of grazing to major vegetation types follow.

Salt Desert Shrub The more productive saltbush ecological sites would respond well to intensive grazing management during wet and normal precipitation years. The less productive sites would change very slowly. Small improvements would occur during wet years. More palatable grasses and shrubs would increase.

Sagebrush Grazing would have little impact on black sagebrush sites. During wet and normal precipitation years Wyoming big sagebrush sites would respond to intensive grazing management. The presence of more palatable bunch grasses would increase as sagebrush decreases.

Pinyon-Juniper Woodlands These areas would not be significantly impacted by grazing.

Greasewood These areas would change very slowly. Small improvements would occur during wet years. More palatable grasses and shrubs would increase.

Hot Desert The few productive sites would respond to intensive grazing management.

Alkali Meadows and Bottoms These areas would respond well to intensive grazing management with an increase in palatable grasses.

Mountain Mahogany Due to the inaccessibility of this type, mountain mahogany would not be impacted by grazing use.

Riparian Riparian areas would respond well to improved grazing management with increases in vegetation diversity, density and production.

From wild horses and burros

Grazing by wild horses and burros impacts the major vegetation types in the same way as described for livestock grazing.

From lands and rights of way

Overall, agricultural entries would have a small impact on vegetation. In the past only seven percent of all agricultural entries have succeeded. Based on this premise, only seven percent (2,310 acres) out of a total 33,000 acres available for agricultural entry would be developed.

From mineral exploration and development:

Mineral exploration and development activities would disturb 36,658 acres of vegetation as follows: locatable minerals, 24,650 acres; oil and gas, 944 acres; geothermal, 364 acres; non-energy leasing, 7,700 acres; and mineral material sales, 3,000 acres.

Short term impacts from surface disturbing activities are: 1) increased soil erosion by wind and water; 2) a small loss of forage and habitat for wildlife, livestock and wild horse and burros; and 3) a visual impact. Reclamation and revegetation should minimize these effects. Long term impacts tend to be mainly visual since disturbed soil supports different vegetation from undisturbed soil.

From fire:

Overall, fire would have a small impact on vegetation. Prescribed and natural fires on pinyon-juniper or big sagebrush vegetation releases beneficial forage plants from the understory. Biological diversity would increase after the initial loss of vegetation. Recovery from fire on salt desert shrub vegetation is slow due to low precipitation and poor soils. Without seeding and protection from grazing, these sites would be dominated in the long term by introduced annuals, such as cheatgrass or halogeton.

IMPACTS TO WILDLIFE HABITAT

From riparian habitat management:

Wildlife would benefit from improved riparian areas and a greater diversity of wildlife species would find suitable habitat along 32.8 miles of stream.

Trout and other aquatic wildlife would benefit from riparian improvement along 9.4 miles of stream. Improved management would increase shading of streams, lowering temperatures, decreasing sediment loads, and improving overall water quality.

From wildlife habitat management:

The development and successful implementation of habitat management plans (HMP) would improve wildlife habitat and allow for increases in wildlife populations in accordance with land-use plan objectives.

Bighorn sheep would benefit from their reintroduction or augmentation into the Hot Creek, Goldfield, Amargosa, Magruder/Palmetto, Monte Cristo, Montezuma, Silver Peak, Sawtooth, and Gold Mountain habitat areas.

Mule deer, bighorn sheep, and sage grouse would benefit from the

protection provided by right-of-way avoidance areas or seasonal restrictions placed on land use authorizations during critical time periods on important winter ranges, strutting grounds or lambing areas.

Limiting animal damage control to the offending animals only would benefit the predator population in the short term since non-offending predators would not be killed. An increase in predation on game and non-game animals could result from the higher population of predators.

From forestry and vegetative products:

Mule deer would benefit from firewood sales on 11,850 acres of pinyon-juniper woodland. Removal of trees would create openings in the overstory canopy which would provide additional sunlight, moisture, and nutrients for important browse and forage species. Residual pinyon-juniper trees would provide adequate thermal and escape cover. The new cutting areas proposed at Kawich, Squaw Hills, and Piper Peak would benefit deer by distributing the cutting more evenly over the mule deer habitat.

From livestock grazing management:

Wildlife habitat is expected to remain in its present condition in the short term. As the findings of the monitoring and evaluation program are implemented and adjustments in livestock and wild horse/burro management are made, wildlife habitat is expected to improve.

Antelope, mule deer, and bighorn sheep habitat would improve through the increased availability of important forage plants. No impacts to Rocky Mountain elk would occur.

Wet meadows and stream bottom riparian areas are preferred by sage grouse for brooding areas and are also preferred by livestock who remove brood cover. Sage grouse habitat would improve with better grazing management in wet meadows and stream bottom riparian areas. Adverse impacts may occur, in the long term, if exclusion were required to improve riparian areas and rank stands of grasses and grass-like plants displace forbs and succulent new growth. Sage grouse habitat could benefit from grazing management designed to increase forbs in meadow areas.

Since competition for available water is a limiting factor in much of the Resource Area, wildlife would benefit from the five reservoirs, 23 spring developments, 28 wells, and 41 miles of pipeline proposed for development for livestock. Perennial water sources would provide substantial benefit to wildlife. However, seasonal water sources would provide only limited benefits.

Waterfowl and riparian habitats may benefit from periodic grazing proposed in the Railroad Valley Wildlife Management Area which are designed to periodically remove rank old growth and to stimulate new growth of riparian vegetation.

From wild horses and burros:

Wildlife habitat is expected to remain in its present condition in the short term. As the findings of the monitoring and evaluation program are implemented and adjustments in livestock and wild horse and burro management are made, wildlife habitat is expected to improve.

From lands and rights-of-way:

Land disposal could have long term negative impacts on wildlife since 240,000 acres, mostly in antelope habitat, have been identified for discretionary disposal in historical

bighorn sheep habitat, deer winter habitat, sage grouse habitat and antelope habitat. All land disposal is discretionary and is preceded by an environmental analysis. This process identifies important resource values such as important wildlife habitat, which should be retained in federal ownership.

Adverse impacts to deer, bighorn sheep, and sage grouse would be minimized since 72,400 acres of important habitats would be protected through seasonal restrictions on land use authorizations.

Adverse impacts to bighorn sheep habitat would be avoided by a requirement that no land uses would be authorized unless they are compatible with bighorn sheep, and by a requirement that no new roads to communication sites be authorized.

Fisheries habitat would benefit should the pond at Moores Station be acquired.

From recreation:

A short term adverse impact to wildlife could occur due to off-highway vehicle events in critical habitats or during such critical periods as birthing or rearing of young. High speed competitive events increase the potential for harassment of wildlife when events pass by critical waters. Spectators also may cause damage to habitat and add to the harassment of wildlife. Beneficial effects on wildlife would result on 72,400 acres where competitive off-highway vehicle events would have seasonal restrictions to protect mule deer, bighorn sheep, or sage grouse on seasonal ranges.

Much of the bighorn sheep habitat would benefit from the restriction of off-highway vehicles to existing roads and trails in primitive, semi-primitive non-motorized and semi-primitive motorized areas. These areas would also be closed to off-highway vehicle events. In addition, 1,440 acres of lambing grounds and 160 acres around Specie Spring would be closed to competitive events.

Trout habitat would benefit from the closure of 9.4 miles of trout stream to the adverse impacts of off-highway vehicle use by limiting vehicles to existing roads and trails.

From utility corridors:

Identified corridors would traverse 388 miles of antelope habitat, 10 miles of mule deer habitat, and border 16 miles of bighorn sheep habitat. None of the corridors would affect wildlife habitat of high value and therefore impacts should be minimal. The greatest impact would be associated with the construction of major pipelines or transmission lines which would be short term. The long term impacts would result from new or improved roads providing increased access and human intrusion into formerly undisturbed habitat.

From mineral exploration and development:

Adverse impacts to wildlife could result from mineral exploration and development activities. Impacts include loss and degradation of habitat, harassment, and a proliferation of roads which fragment the habitat. These impacts are reduced by seasonal restrictions on mineral leasing on 72,400 acres of mule deer, bighorn sheep or sage grouse habitat. The adverse impacts to wildlife habitat caused by opening 23,160 acres of important wildlife habitat to mineral leasing will be minimized by the seasonal restrictions applied during critical periods.

Bighorn sheep lambing grounds would

be protected by withdrawal from mineral entry on 1,440 acres of land at Stonewall Falls and Little Meadows where there is a high potential for locatable minerals.

IMPACTS TO SPECIAL STATUS SPECIES

From livestock grazing management:

The population of Railroad Valley springfish would be maintained or enhanced by the continued protection of North Spring, Reynolds Spring, and the refugium at Chimney Spring through the exclusion of livestock.

Desert tortoise populations would be maintained. Implementation of the grazing restrictions consistent with the *Biological Opinion for the Proposed Livestock Program within Desert Tortoise Habitat in Southern Nevada* would ensure tortoise recruitment is sufficient to maintain a stable population on 70,600 acres of Non-Intensive Category III desert tortoise habitat.

From lands and rights-of-way:

Approximately 30,000 acres of Non-Intensive Category III desert tortoise habitat are identified for possible disposal. Disposal of these lands would have an adverse impact. However, since all land disposal actions are discretionary and are preceded by a land report/environmental analysis, this process would identify any sensitive, threatened or endangered species habitat and provide for mitigation and/or avoidance of possible adverse impacts. All Federal actions which might impact a threatened or endangered species would be evaluated by the USFWS under provision of Section 7 of the Endangered Species Act.

From ACECs:

Amargosa toad and Oasis Valley speckled dace habitat would benefit from the actions proposed in the designation of the Amargosa-Oasis ACEC. Livestock and wild burros would be restricted from 490 acres which would protect riparian vegetation from grazing and improve water quality. Occasional grazing would control the encroachment of riparian vegetation into open water needed by the tadpoles and dace. Habitat conditions would also be beneficially affected by limiting of off-highway vehicle use to existing roads and trails. Should adjacent private lands supporting toad and dace habitat be acquired, improved management of additional habitat would result. All mining operations proposed within the ACEC would require a plan of operations which would protect the ACEC's values through the development of appropriate mitigation measures. Withdrawal of the area from mineral entry would prevent expansion of mineral rights in the habitat area. Land-use authorizations would be limited to those which are compatible with the management of the area.

The Railroad Valley springfish would benefit in the short term and the long term from the actions proposed in the designation of the Railroad Valley ACEC. Land-use authorizations which could adversely impact the springfish would not be allowed on 80 acres of surrounding habitat. The springs containing the springfish would continue to be protected from livestock. Adjacent private lands contain springfish habitat and are identified for possible acquisition which would add to the habitat managed for their benefit. The adverse impacts of mineral exploration and development would be avoided by a withdrawal from mineral entry and a no surface occupancy stipulation on oil and gas

and geothermal resources. Potential adverse impacts from off-highway vehicle use would be avoided by limiting vehicles to existing roads and trails.

From recreation management:

In the long term off-highway vehicle use could result in direct mortality of desert tortoise and cause a proliferation of trails destroying and fragmenting habitat. Desert tortoise would benefit from the limiting of vehicle use to existing roads and trails and the protection of washes in tortoise habitat. Desert tortoise surveys conducted prior to off-highway vehicle events would ensure that tortoise would allow for changes in the course to avoid occupied habitat.

Amargosa toad and Oasis Valley speckled dace habitat would benefit from the limitation of vehicle use to existing roads and trails on 490 acres.

All Federal actions which might impact a threatened or endangered species would continue to be submitted to the USFWS for Section 7 consultation, as required by law.

From mineral exploration and development:

Requirements listed under Section 7 of the Endangered Species Act would prevent any serious impacts to the listed or candidate T&E species in the Resource Area.

Potential impacts to the Railroad Valley springfish from fluid mineral development would be mitigated by a no surface occupancy restriction on mineral leasing on 80 acres in an area of high potential for oil and gas, and moderate potential for geothermal resources. Adverse impacts from locatable mineral exploration and development are not anticipated since the mineral potential is low.

Approximately 24,000 acres of Non-Intensive Category III desert tortoise habitat are located within an area of high potential for locatable minerals. The remaining 46,600 acres are in an area of moderate potential. Although the desert tortoise population in the Resource Area is sparse, there is the potential for a small number of tortoise to be killed by mining activity and for habitat to be lost. Exploration activities would result in short term negative impacts to the tortoise. The term of development activities would be dependent on the life of the mine.

From mineral materials:

The sale of sand from Crescent Sand Dunes and Clayton Valley Sand Dunes may adversely affect special status species. However, all proposed sales are discretionary and would be evaluated to determine potential impacts.

IMPACTS TO RIPARIAN HABITAT

From riparian habitat management:

Of the 2,235 acres excluded from livestock in the Railroad Valley Wildlife Management Area, 40 acres are expected to improve from fair to good, and the remaining 2,195 acres would be maintained in good condition.

Riparian conditions would improve in the long term. Three and one-half miles of stream in satisfactory condition (Troy Creek, Deep Creek, Moores Creek, and Perry Aiken Creek) would remain so. Another 6.5 miles with an improving trend (Pine Creek, Eden Creek, and Jefferson Creek) would continue to improve. On six miles of stream (Hunts Canyon Creek, Barley Creek, Corcoran Creek, Little Meadow Creek, and Clear Creek) where the streambank stability and streambank cover ratings are both less than 50 percent, progress would be

made through improved livestock management or by fencing and exclusion of livestock and wild horses. For the 16.8 miles of stream in unsatisfactory condition where the trend has not been determined, conditions would also improve.

From livestock grazing management:

As the findings of the monitoring and evaluation program are implemented and adjustments in livestock and wild horses and burros are made, riparian habitat is expected to improve in the long term. The impact of grazing on riparian habitat depends on the accessibility of the area, the number of grazing animals in the area and the period and duration of use. The lack of water and sparse vegetation on much of the Resource Area causes livestock and to a lesser extent wild horses and burros to concentrate on the riparian habitat for water, forage and shade. Under current management, season-long grazing takes place in most allotments in the Resource Area. The impact on riparian vegetation is continuous over use which reduces stream flow, water quality, increases erosion and invasion of undesirable vegetation. Riparian areas would respond well to improved grazing management with increases in vegetation diversity, density, and production in the long term.

Range improvements would provide additional water, forage, and control facilities to reduce grazing impacts on riparian areas somewhat. There are 23 springs proposed for development which would have the spring sources protected from the adverse impacts of utilization by livestock and wild horses and burros. This would provide for some improvement of aquatic habitat conditions through reduced erosion, improved water quality, increased ground water recharge, more stabilized streambanks, more productive habitat, more diverse stream channels and increase species diversity. However, in the short term, most existing spring developments would not exclude livestock and wild horses and burros. Therefore, significant grazing impacts on spring sources and associated riparian zones would continue. In the long term, as existing spring developments are fenced in accordance with SOPs, riparian habitat conditions would improve.

From lands and rights-of-way:

Riparian habitat could be adversely impacted by disposal of six miles of streamside riparian areas. However, all land disposal is discretionary and is preceded by an environmental analysis. This process identifies important resource values which would be retained in federal ownership, such as springs and seeps, unless disposal would be in the public interest.

From recreation:

Limiting off-highway vehicles to existing roads and trails in the Railroad Valley ACEC would protect 4,154 acres of riparian areas. In the Amargosa-Oasis ACEC, two miles of streamside riparian and nine springs would also be protected. The limiting of off-highway vehicles to existing roads and trails along a 300 foot wide strip on both sides of 9.4 miles of stream would assist in protecting riparian habitat from potential adverse impacts.

From mineral exploration and development:

Of the 32.8 miles of streamside riparian identified on Table 3 C, 29 percent are in areas of high potential, 31 percent in areas of moderate potential, and 40 percent are in areas of low potential for locatable minerals. Mineral exploration and development along these streams would adversely impact riparian zones.

The Amargosa-Oasis ACEC would be withdrawn from mineral entry protecting two miles of streamside riparian and nine springs in areas of moderate and high potential for locatable minerals. Riparian areas, including springs and seeps, would be given protection by the standard terms and conditions applied to leasable minerals.

Riparian habitats would benefit from no surface occupancy stipulations and withdrawal from mineral entry in the Railroad Valley ACEC. The potential for oil and gas is high and the potential for geothermal resources is moderate in the Railroad Valley ACEC. An estimated 3,480 acres of riparian area would be protected by a no surface occupancy stipulation. The withdrawal for the Railroad Valley ACEC would protect an estimated 4,154 acres of habitat where mineral potential is low.

IMPACTS TO FORESTRY AND VEGETATIVE PRODUCTS

From forestry and vegetative products:

No adverse impacts would occur to the woodland resource as a result of firewood harvest. The current level of harvest is within the sustained yield on the operable woodland acres. The demand for firewood has averaged 675 cords for the past three years. It is anticipated that future demand would increase until the sustained yield of 1,000 cords a year is reached. A total of 20,000 cords would be sold during the life of the plan. The greenwood cutting areas would naturally reforest in a short period of time since the smaller trees are not cut. In the short term, harvest in the Lida area would be temporarily heavy while other areas would be light. In the long term, the harvest of fuel wood could be more evenly distributed throughout the Resource Area.

The opening of an additional 11,850 acres for greenwood cutting would provide adequate volume to last 30 years, which is beyond the life of the plan, while leaving one-third of the crown cover standing on the harvest sites.

From recreation:

Adverse impacts to firewood harvest levels would result from limiting off-highway vehicle use to existing roads and trails in primitive, semi-primitive, non-motorized and semi-primitive motorized areas.

When and if Congress releases wilderness study areas for multiple use purposes, approximately 14,300 acres of otherwise operable pinyon-juniper woodlands would not be available due to vehicles being limited to existing roads and trails on primitive, semi-primitive, non-motorized and semi-primitive motorized areas.

From mineral exploration and development:

Mineral exploration and development would have a positive impact on woodland management. The development of roads and trails in stands of pinyon-juniper resulting from mineral exploration would improve the access to woodland products and help to more evenly distribute the harvest of firewood and other vegetative products.

Loss of trees through exploration and development would be minor since reasonably foreseeable development scenarios for all mineral programs anticipate that less than one percent of the Resource Area would have surface disturbance due to mineral location and development.

IMPACTS TO LIVESTOCK GRAZING MANAGEMENT

From vegetation management:

Managing for desired plant community would have a short term negative impact on livestock grazing use where it is determined that a reduction in livestock use was necessary to attain objectives. In the long term, the impact to livestock grazing would be positive where additional forage becomes available and some or all of the initial reductions are restored.

From wildlife habitat management:

The restriction of livestock grazing from 9,127 acres of critical deer winter range closed to grazing on Toiyabe Bench would continue to have a minor negative impact on livestock grazing within these areas.

The adjustment of livestock grazing use based on monitoring of wildlife habitat management objectives would have a negative impact on livestock numbers in the short term. However, as resource conditions improve the carrying capacity for all herbivores, including livestock would increase.

From special status species management:

There are 70,600 acres of Non-Intensive Category III desert tortoise habitat within portions of two allotments. Should use exceed the levels specified in the *Biological Opinion for the Proposed Livestock Program Within Desert Tortoise Habitat in Southern Nevada*, the lessees would have to remove all livestock from this habitat. However, the impact on these operations would be minimal as there is grazing land available in both allotments outside of tortoise habitat to which livestock could be moved. Therefore impacts to grazing management would be minimal.

Critical habitat for the Railroad Valley springfish has been excluded from livestock grazing where it occurs on public lands. A total of 124 acres of springfish habitat would continue to be excluded from livestock.

The 490-acre Amargosa-Oasis ACEC would be excluded from livestock to protect habitat for the Amargosa toad and Oasis Valley speckled dace. This action would negatively impact livestock grazing management in the long term since these acres contain the more desirable forage for the livestock and supply their primary water sources.

From riparian management:

There are 2,235 acres of riparian areas within the Railroad Valley Wildlife Management Area excluded from grazing. No adverse impacts to grazing management are associated with this action. In the long term, there might be some positive impacts as livestock are used to remove encroaching riparian vegetation.

A total of 229 acres of riparian corridors along six miles of stream would be fenced and excluded from livestock grazing. The net loss of 24 AUMs would result in four allotments. This loss would be less than one percent of the total use and is therefore only a slight impact.

From wild horse and burro management:

Domestic livestock and wild horses and burros compete for forage, water, and space wherever their areas of use overlap. Managing for wild horse and burro population levels, as determined from the findings of the monitoring and evaluation program, could require a reduction in livestock numbers to provide habitat for wild horses and burros and for other resource values.

From cultural resource management:

The impacts of cultural resource management on livestock grazing management would be minimal since proposed livestock management facilities are normally either relocated or rerouted to protect these sites.

The prohibition on new range improvements and the requirement not to increase grazing levels in the vicinity of Storm, Abel and Coyote Hole Springs would not impact grazing use, since no new range improvements are planned in this area.

From lands and rights-of-way:

A total of 299,140 acres could be transferred out of federal ownership. This is approximately 5 percent of the total available grazing land in the Resource Area. Only the Francisco and Smoky Allotments would be impacted significantly through the loss of grazing lands. The Francisco Allotment would be virtually eliminated if all identified lands were transferred, while approximately one half of the Smoky Allotment would become private. This would have significant negative impacts on five permittees and their current grazing privileges. All land disposal is discretionary and is preceded by an environmental analysis to identify resource values which should remain in federal ownership.

From mineral exploration and development:

Because areas disturbed by mineral exploration and development would be reclaimed, long term or significant impacts to forage production are not anticipated. Short term negative impacts would result from the temporary loss of 1,308 acres of available grazing lands through oil, gas, and geothermal exploration and development. This would not be considered significant when viewed in relation to the total acreage available. In addition, short term negative impacts would result from the temporary loss of 24,650 acres of available grazing lands due to the exploration and development of locatable minerals within the Resource Area. Short term negative impacts would also result from the temporary loss of available grazing lands to the sale of mineral materials. Based upon the projected development of mineral materials, 3,000 acres of available grazing lands would be temporarily lost to livestock operators throughout the Resource Area. This acreage represents one-half of one percent of the total acreage open to grazing within the Resource Area.

From fire:

Both positive and negative impacts to grazing management could result from fire. Negative impacts result from a short term loss of forage disruption of existing management systems and possible closure to grazing for revegetation of the burn site. A long term negative impact could occur if the burned area is invaded by unpalatable plants such as rabbitbrush or halogeton, thus effectively reducing forage production. Positive impacts can result from fire by reducing the density of tree and brush species and releasing more desirable forage. Since naturally occurring fire is infrequent (only 1,947 acres burned between 1980 and 1990) impacts would be insignificant. The use of prescribed fire for vegetative manipulation on approximately 36,400 acres would result in long term positive impacts to forage availability and increased management options.

IMPACTS TO WILD HORSES AND BURROS

From wildlife habitat management:

Wildlife proposals to support Habitat Management Plans, such as big game

guzzlers and reintroduction of bighorn sheep, could result in wildlife populations expanding into areas currently utilized by wild horses and burros. Expanding usable wildlife habitat and allowing mule deer, antelope, and bighorn sheep to increase and reach levels consistent with the carrying capacity could result in competition between wild horses and burros and wildlife. If inter-specific competition becomes evident through the monitoring and evaluation program, a long term impact might occur if wild horses and burros were reduced.

From special status species management:

There are 70,600 acres of Non-Intensive Category III desert tortoise habitat in the Bullfrog HMA (more than 45 percent of the HMA). Should use by burros exceed the levels specified in the *Biological Opinion for the Proposed Livestock Program Within Desert Tortoise Habitat in Southern Nevada*, the burro population would be reduced. These long term impacts could be significant.

There are 490 acres in the Amargosa-Oasis ACEC which would be excluded to protect Amargosa toad and Oasis Valley speckled dace habitat. This action would negatively impact the wild burros in the long term since these acres contain the more desirable forage and supply the primary water sources.

From forestry and vegetative products:

The greenwood cutting areas at Silver Peak, Piper Peak, Montezuma, Bellehelen, and Kawich (a total of 6,200 acres within the HMAs) would have minimal adverse impact on wild horses and burros. There could be some stress imposed by human intrusion during cutting. The long term effect would be a more open area, better visibility, and the potential for more grasses and forbs.

From livestock grazing management:

Wild horses and burros would be beneficially impacted through improved grazing management and resulting improved range conditions.

Range improvement projects could beneficially impact wild horses and burros by establishing more dependable supplies of water and better distribution of animals in the HMAs.

Highway right-of-way fencing such as along U.S. Highway 6 through Stone Cabin HMA would have an adverse impact on wild horses. Such fences would divide the HMA into two separate use areas and result in a long term restriction on travel patterns. No long term adverse impact would occur to the horse population.

Domestic livestock and wild horses and burros compete for forage, water, and space wherever their areas of use overlap. Managing for livestock in HMAs, as determined from the findings of the monitoring and evaluation program, could require a reduction in wild horse/burro numbers to provide forage for livestock.

From wild horse and burro management:

Removal of wild horses and burros on a three year cycle would have a short term adverse impact on wild horses and burros by reducing population sizes to a point from which it will take three years to again reach initial herd sizes or appropriate management levels. This action would have a positive impact on the wild horses and burros left on the range since fewer animals would mean less competition for forage, water, shelter, and space.

The application for water rights and/or assertion of public water reserves on certain waters within the HMAs could positively impact the wild horses and

burros by guaranteeing Federal water rights in the long term. This in turn would allow improvements to be made on existing important water sources which would result in improved water flow and reliability.

From lands and rights-of-way:

A total of 66,000 acres of land within HMAs would be available for discretionary disposal; 23,000 acres in Bullfrog HMA, 10,000 acres in Fish Lake Valley HMA, 11,000 acres in Goldfield HMA, 11,000 acres in Montezuma HMA, 1,000 acres in Palmetto HMA, and 10,000 acres in Stone Cabin HMA.

Lands disposed of within the boundaries of a herd area could not be replaced by lands outside the boundaries. The loss of territory has the potential of causing long term adverse impacts to wild horses and burros by reducing their forage, water, shelter, and space. The lack of any of these requirements could potentially force wild horses and burros to move outside the boundaries of the herd area which could result in the removal of the animals from the range. In addition, long term conflicts with private landowners within the HMAs could result. However, all land disposal is discretionary and preceded by an environmental analysis to identify resource values which should be retained in federal ownership.

From recreation:

Short term negative impacts could result from running of competitive off-highway vehicle events through HMAs. Events run from May through June could have impacts on foals if the mare and foal are separated. Events run near important water sources could result in animals avoiding water for the duration of the race. The closure of 160 acres (one-quarter mile radius) to off-highway vehicle events around Mud Spring and Specie Spring would reduce the potential for disturbance to wild burros during events. No long term affects are anticipated from competitive off-highway events.

The designation of primitive, semi-primitive non-motorized and semi-primitive non-motorized status on 450,000 acres within the HMAs would benefit wild horses and burros since OHV use would be limited to existing roads and trails, thus reducing the amount of interference with horse and burro movement.

From mineral exploration and development:

The potential for locatable minerals is high on 17 percent of the acreage inside HMAs and moderate on 38 percent. The exploration and development of mineral resources could impact wild horses and burros. In the short term this activity could drive animals away from the waters and forage. If these activities last for an extended period of time the normal grazing and watering practices could be permanently modified. Wild horses and burros would either adapt to the disturbance or move to other locations. Most disturbed areas would be reclaimed which in the long term would make these reclaimed lands again available to wild horses and burros.

IMPACTS TO CULTURAL RESOURCES/PALEONTOLOGICALRESOURCES

The potential impacts to the paleontologic resources of the Resource Area are difficult to determine as an adequate inventory does not exist. In the meantime, paleontological resources will continue to be managed and protected through environmental review of proposed surface disturbing activities.

From forestry and vegetative products:

Opening pinion-juniper to firewood harvest on 11,850 acres has the potential for significantly impacting 286 cultural sites, and lesser impacts to traditional values of local Native American populations who rely on the pinyon harvest for a portion of their sustenance. Long term impacts from firewood harvest include: damage to cultural features, horizontal and vertical displacement of artifacts resulting from trees, equipment, and vehicles being dragged or driven over sites, and increases in illegal excavation and collection activities as a result of improved access. Cultural inventory would be conducted on all areas identified for cutting.

From livestock grazing management:

Construction of rangeland improvements such as wells, fences and pipelines would impact 39,785 acres. Vegetation manipulation is anticipated to occur on approximately 42,460 acres. Efforts to manipulate vegetation through manual, mechanical, and chemical methods or prescribed burns, could result in significant damage to cultural properties, and might impact traditional values. Manual and mechanical methods can alter or destroy the spatial context of artifacts and features; prescribed burns may cause the destruction of perishable artifacts near the ground surface, heat spalling on rock art panels, and alter artifacts so that some dating techniques are no longer usable; and some chemical techniques may preclude later use of Carbon-14 dating. Effects from continued and increased use of 42,460 acres by cattle include horizontal and vertical displacement of artifacts, damage to artifacts and features, destruction of sites during construction of rangeland improvements, and surface disturbance associated with vehicles used by permittees. An estimated 1,529 sites might be affected by activities associated with rangeland improvement.

Livestock would be excluded from 11,163 acres. Protection from disturbance associated with rangeland improvements and grazing would be afforded to 402 cultural resources estimated to be present on this acreage. Some riparian zones are included in these exclusions. This should enhance the probability for site protection as riparian environments are highly sensitive locations for cultural resources.

From cultural resources management:

Emphasis would be placed on developing proactive aspects of the cultural resources program. ARPA surveillance points would be established in a number of locations, ARPA law enforcement and monitoring plans would be written for a minimum of nine sites/districts, and activity plans would be written for approximately seventeen sites/districts over the life of the Plan. A Class I overview would be prepared for the Resource Area to help guide management decisions. These actions would result in long term positive impacts to cultural resources.

Interim management directions for archaeological districts in northern Railroad Valley would result in decreased impact to sites/features by limiting vehicle use to existing roads and trails and prohibiting discretionary surface disturbing activities in the Trap Springs/Gravel Bar area and by prohibiting new range improvements in the vicinity of the Stormy-Abel district until such time as a comprehensive research protocol could be developed and implemented. Impacts to the Trap Springs and Gravel Bar districts would continue in areas that could be accessed by existing roads, and the

Stormy-Abel district would continue to be impacted by heavy grazing in the vicinity of existing watering troughs.

A comprehensive research protocol and data recovery program would be developed for the Trap Springs, Gravel Bar, and Stormy-Abel prehistoric districts. Data recovery at these localities would benefit the scientific community, but would result in partial destruction of the sites through controlled excavation. Eventual release of the Trap Springs and Gravel Bar districts for fluid minerals development could be expected to result in destruction of the remainder of these sites, while relaxation of proposed interim rangeland development restrictions in the vicinity of Storm, Coyote, and Abel springs would result in continued degradation of sites and features in this prehistoric district.

No surface occupancy would be stipulated for 50 acres surrounding two known archaeological and historic sites not a part of cultural ACECs. It is estimated that a minimum of two additional sites might be protected within this acreage. Berlin Town Site (704 acres) would benefit from continued closure to mineral leasing. Withdrawal from mineral entry and restriction of vehicles to existing roads and trails at Moores Station Petroglyphs (40 acres) and Mountain View Arrastra (40 acres) would result in added protection for two known cultural resources and an estimated minimum of two additional cultural properties. Restriction of vehicle use to designated roads and trails at the Cane Man Hill Petroglyph site would afford an added degree of protection to the panels.

Three cultural ACECs would be designated. The Rhyolite ACEC would consist of 425 acres of public land within the boundaries of the historic townsite and would serve to protect not only the major ruins within the town, but significant portions of the historic archaeological remains as well. The Cane Man Hill ACEC would consist of 680 acres encompassing the known extent of the petroglyph panels. The Tybo-McIntyre ACEC would consist of four, twenty acre parcels surrounding the known kiln groups. All cultural ACECs would be withdrawn from mineral entry with a no surface occupancy stipulation. These restrictions should decrease the chance of impacts to sites/features within the ACECs from locatable and fluid minerals development.

From lands and rights-of-way:

A total of 299,140 acres of land have been identified for discretionary disposal. Disposal of public land and ensuing construction activities might result in complete destruction of cultural properties. Disposal of land for agricultural purposes might result in partial or complete destruction of sites as a result of field preparation methods or intensive use of the area by livestock. Land disposals might also increase access into areas resulting in a rise in illegal excavation and collection activity. It is estimated that 5,370 cultural properties might be present in areas proposed for disposal. Land disposals are discretionary and would not occur if there would be unacceptable impacts to cultural resources.

Retention of areas identified for disposal within the Amargosa-Oasis ACEC (490 acres), in riparian areas along Perry Aiken and Jefferson creeks (30 acres), and within deer winter range along Chiatovich Creek (5,760 acres) would result in some degree of protection from development for 152 sites. Acquisition of 320 acres at Moores and Pritchards Stations, 480 acres at Lockes Ranch, and 280 acres within the Amargosa-Oasis ACEC (490

acres) would bring an estimated 19 sites under federal management, providing them some degree of protection from land disturbing activities. Acquisition of Moores and Pritchards Stations might become a burden to the cultural resources program because of the need to stabilize and rehabilitate the structures. However, benefits afforded by developing interpretive facilities and increasing recreation opportunities in these areas might outweigh the cost of stabilization and rehabilitation. Should private lands adjacent to the Rhyolite ACEC be acquired (120 acres), management problems relating to mixed land ownership would be reduced.

From recreation:

A total of 4,840,811 acres would remain open and unrestricted to off-highway vehicle use. An estimated 117,148 sites might be present within this area. Impacts from off-highway vehicle use include partial or total destruction of features and sites as a direct result of driving across them, destruction of sites and features as a result of increased erosion associated with changes in vegetation/ground cover, and a rise in illegal excavation and collection activities associated with increased access into previously undisturbed areas. During competitive events, sites located in pit areas and along the raceway might be partially or wholly disturbed, and collection of surface artifacts by spectators could be expected. Restricting off-highway vehicle use to existing roads, trails, and washes on a seasonal basis, or by type of user on 1,250,290 acres might afford some slight degree of protection to approximately 30,172 sites. In this instance, direct impacts of off-highway vehicle use would be confined to areas of existing disturbance, but a rise in illegal excavation and collection activities resulting from increased access to previously inaccessible areas is expected. Designation of 61,155 acres as Special Recreation Management Areas (SRMAs) at Crescent Sand Dunes, the Lunar Crater Volcanic Field, Rhyolite, and the Railroad Valley Wildlife Management Area, might result in increased protection for an estimated 1,476 sites owing to the more intensive management these areas would receive. However, management strategies focused on increasing visitation to SRMAs could result in an overall negative effect on cultural properties. If Moores and Pritchards Stations were acquired and designated SRMAs, two known historic sites and approximately five additional cultural resources would be brought under federal management, thereby protecting them from development. However, the net effect on cultural resources in these areas could be negative due to rises in vandalism, illegal collection, and excavation associated with increased visitation. Regular surveillance and monitoring associated with management of the SRMAs would have a beneficial impact by discouraging destructive activities. Designation of an SRMA at Rhyolite would allow for additional signing and development of other interpretive and visitor facilities in conjunction with a local concerned citizens group. Development of interpretive facilities at this site is expected to result in a decrease in vandalism and illegal collection.

Designation and development of Back Country Byways in the Emigrant Pass, Lunar Crater Volcanic Field, and Morey-Hot Creek areas would result in increased visitation. An increase in the number of visitors could be expected to result in a rise in incidents of vandalism, illegal excavation and collection of an undetermined number of sites.

From utility corridors:

The designation of 668 miles of utility corridors would not directly impact cultural resources. However, impacts to an undetermined number of cultural resources would result if one or more major power lines were constructed within these corridors. Because each corridor is three miles wide, impacts directly associated with construction could be expected to be minimal as relocation of towers and access roads could be adjusted to avoid cultural properties. However, construction of service roads within utility corridors would increase access into previously inaccessible areas, leading to a rise in incidents of vandalism, and illegal excavation and collection.

From mineral exploration and development:

Impacts to cultural resources from fluid mineral leasing and geophysical exploration include destruction of some sites during construction of well pads, access roads, and other facilities. Furthermore, damage to sites from erosion in areas where vegetation has been altered or destroyed (sites in sand dunes are particularly vulnerable to this type of impact) could be expected. Other possible impacts include destruction of or alterations in the character of artifacts and features from accidental spills of petroleum products and/or other substances thereby precluding some kinds of analysis such as Carbon-14 dating and blood residue studies. Vandalism and illegal excavation and collection also seem to be associated with increased access. It is projected that a total of 944 acres would be directly impacted as a result of well pad, access road and facility construction. There might be 32 sites within this area. A total of 3,240 acres would be closed to fluid mineral leasing and geophysical exploration, and no surface occupancy associated with these activities would be allowed on an additional 53,801 acres. An estimated 1,938 cultural resources might be afforded some protection from impacts related to fluid mineral exploitation as a result of these restrictions.

Impacts from locatable mineral development include partial or complete destruction of cultural properties resulting from exploration, increased erosion, mine development, and construction of mills and other facilities. Cultural properties might also be buried under mountains of waste rock while visible features are more likely to be illegally collected and excavated. Historic mining sites (e.g., townsites, isolated homesites, mills, adits, and trash dumps) are particularly vulnerable as much mineral development occurs within historic mining districts. Prehistoric quarry sites are often found in areas of heavy mineralization, and are therefore subject to intense impact from mineral development. An estimated total of 24,650 acres would be developed as a part of the locatable minerals program. This has the potential for adversely affecting an estimated 538 sites. A total of 9,649 acres of existing withdrawals from mineral entry would be continued, and 42,991 additional acres would be proposed for withdrawal. This would afford some protection to approximately 1,040 sites.

Impacts associated with mineral materials development include partial or complete destruction of cultural properties and paleontological localities. One thousand acres are projected for mineral materials development. This has the potential for affecting 24 cultural properties. A total of 50,524 acres would be closed to sale of mineral materials. This would eliminate impacts from this source at an estimated 1,220 sites.

Impacts to cultural resources from development of non-energy leasable minerals include complete or partial destruction of sites associated with construction of access roads, evaporation ponds, and other facilities, erosion or burial of sites and features in locations where vegetation has been disturbed or removed, and a rise in the number of incidents of vandalism, and illegal excavation and collection as a result of increased access. Cultural properties situated in valley bottoms and along valley margins or old lake shores are particularly vulnerable. An estimated 7,750 acres would be developed for non-energy leasable minerals. This has the potential for affecting an estimated 187 cultural properties. A total of 55,349 acres would be closed to non-energy mineral leasing, which would eliminate impacts from this source to an estimated 1,336 sites.

IMPACTS TO LANDS AND RIGHTS-OF-WAY

From wildlife habitat management:

Actions proposed for wildlife habitat management would result in the creation of 73,840 acres of right-of-way avoidance areas for the protection of deer winter range, sage grouse habitat, bighorn sheep habitat, and bighorn sheep lambing grounds. If rights-of-way or other discretionary lands actions were to be allowed within these areas, the authorizing documents would include seasonal restrictions to protect the area's special values. Little interest has been expressed in land use authorizations within these areas. If application is made, it is doubtful that the imposition of seasonal restrictions would cause a hardship. Therefore, the creation of these avoidance areas would have no impact on the Lands and Rights-of-Way Programs.

No new sites for communication facilities would be authorized within bighorn sheep habitat. BLM already has developed communication sites in bighorn sheep habitat on Bare Mountain (near Beatty), Magruder Mountain, Palmetto Mountain, Monte Cristo Range, Sawtooth Peak, and Montezuma Peak. New communications facilities could be authorized at these developed sites. Communication site right-of-way exclusion areas would be established within bighorn sheep habitat in the Silver Peak Range, Grapevine Mountain, Hot Creek Range, Lone Mountain, Palisade Mesa, and the Quinn Canyon Range. No interest has yet been expressed in developing communications sites in any of these areas except Lone Mountain. However, this could cause a hardship for the communications industry. Restriction of expansion opportunities might eventually lead to overcrowding on existing sites.

From special status species management:

Rights-of-Way would be excluded from 70,600 acres of washes within desert tortoise habitat unless the rights-of-way are compatible with the desert tortoise. This would impact the Lands and Rights-of-Way Programs because washes are often the location of choice for road rights-of-way, particularly sandy washes which are desirable tortoise habitat.

A 40 acre right-of-way avoidance area at North Spring and a 40 acre right-of-way avoidance area at Reynolds Spring (both in Railroad Valley) would be designated. These areas are so small that their creation would have no impact to the Lands and Rights-of-Way Programs.

From cultural resource management:

A 40 acre right-of-way avoidance area would be designated at the Moores Station Petroglyphs and a 40 acre

right-of-way avoidance area would also be designated at the Mountain View Arrastra. If any rights-of-way or other discretionary land use authorizations were to be allowed within these areas, stipulations would be included in the authorizing documents to protect the areas' special values. Because of the areas' small size(s), there would be no impact to the Lands and Rights-of-Way Programs.

A total of 821 acres of right-of-way avoidance areas would be designated at Rhyolite, Cane Man Hill Petroglyphs, Tybo Charcoal Kilns, and McIntyre Charcoal Kilns. Because of the small size of these areas and their distance from population centers, the creation of these avoidance areas would have no impact on the Lands and Rights-of-Way Programs.

From lands and rights-of-way:

A wide range of opportunities for meeting community expansion needs, disposing of unmanageable parcels, resolving trespass, and expanding rural landholdings would result.

If the original entrant or the entrant's assignee fails to prove up under the agricultural land laws on the approximately 30,000 acres identified for agricultural entry, the land would no longer be available for disposal under the agricultural land laws, but it would be available for disposal under the sale and exchange authorities. This would have a positive impact on the Lands Program because it would limit the amount of time and money expended on disposals under the agricultural land laws, and it would allow for the efficient disposal of lands.

Approximately 221,000 acres would be included in right-of-way avoidance areas for the support of other resource programs. Because most of these areas are remote and the demand for rights-of-way or other discretionary lands actions is small to non-existent, this would have a negligible effect on the Lands and Rights-of-Way Programs.

No new roads for communication facilities would be allowed within bighorn sheep habitat. Bighorn sheep habitat encompasses many of the highest peaks within the Resource Area. Making these peaks available for the development of new communication sites with helicopter access only would restrict the potential for growth in the communications industry in the Resource Area and would consequently impact the Lands and Rights-of-Way Program.

All other lands within the Resource Area would be open to consideration for linear or aerial rights-of-way, leases, and permits unless there was a conflict with other resource values that could not be resolved. Even with all of the restricted areas the Proposed RMP proposes, there would still be nearly six million acres available for consideration for rights-of-way and other discretionary lands actions. This would have a beneficial impact on the Lands and Rights-of-Way Programs.

A total of 28,996 acres of withdrawals from mineral entry would be requested. Given the small size of these areas, their withdrawal should have little impact on the Lands and Rights-of-Way Programs with the exception of the proposed withdrawal from mineral entry of 490 acres comprising the Amargosa-Oasis ACEC. This area is comprised of several parcels which because of their location and size are difficult and uneconomic to manage as part of the public lands. Retaining them and attempting to manage them more intensively than they are presently managed would be costly and burdensome to the Lands Program. The proposed withdrawals of Gold Point and Rhyolite would greatly

facilitate management of those areas.

From ACECs:

The Lunar Crater Volcanic Field would be designated as an ACEC. This designation would create a 39,680 acre right-of-way avoidance area. If any rights-of-way or other discretionary land use authorizations were to be allowed within the ACEC, stipulations would be included in the authorizing documents to protect the area's special values. There would be no impact to the Lands and Rights-of-Way Program.

The Amargosa-Oasis area would be designated as an ACEC. This action would create a 490 acre right-of-way avoidance area. No rights-of-way or other discretionary lands actions would be allowed which were not compatible with the area's special values. Several of the parcels included in this ACEC lie between private land and US 95 and are, therefore in high demand for rights-of-way of all descriptions. This action could severely restrict development in the Beatty area.

Cane Man Hill would be designated as an ACEC. This action would create a 680 acre right-of-way avoidance area. If any rights-of-way or other discretionary land use authorizations were to be allowed within the ACEC, stipulations would be included in the authorizing documents to protect the area's special values. Owing to the small size and remote location of this ACEC, there would be no impact to the Lands and Rights-of-Way Programs.

Lone Mountain would be designated as an ACEC. No new communication site facilities would be allowed within this ACEC. This action might impact the communications industry because it would require them to use other sites. There has been no interest expressed in other land use authorizations within this area.

An ACEC would be designated in Railroad Valley. This action would create a 15,470 acre right-of-way avoidance area. If rights-of-way or other discretionary lands actions were to be allowed within it, the authorizing documents would include stipulations for the protection of the area's special values. It is not expected that the imposition of such stipulations would create a hardship especially because the proposed utility corridor below the Grant Range would be excepted from the avoidance area. There would be no impact on the Lands and Rights-of-Way Programs.

A 425 acre ACEC would be designated in Rhyolite to protect historic structures. This designation would create a right-of-way avoidance area. No land uses would be authorized which were not compatible with the area's special values. The Small Tract classification on the four acre site of the Bottle House would be terminated, and the entire 126 acre area would be withdrawn from mineral entry. This action would greatly enhance management of the area even though it would not eliminate existing claims.

The Tybo-McIntyre Charcoal Kilns would be designated as an ACEC. This would create an 80 acre right-of-way avoidance area. If rights-of-way or other discretionary lands actions were to be allowed within the area, stipulations would be included in the authorizing documents for the protection of the area's special values.

From recreation:

The establishment of Special Recreation Management Areas would result in a total of 5,500 acres of right-of-way avoidance areas at Clayton Valley Sand Dunes and the Crescent Sand Dunes.

From mineral exploration and development:

Much of the land identified for disposal under the sale and exchange authorities is encumbered with mining claims and could not be disposed of unless those claims are extinguished.

IMPACTS TO UTILITY CORRIDORS

From lands and rights-of-way:

Some of the lands identified for disposal at Berlin, Carver's, Tonopah, Nyala, Blair, Coaldale, Silverpeak, Goldfield, Scotty's Junction, Springdale, and Beatty are included within the proposed utility corridors. This might lead to conflicts as these lands are transferred into private ownership. Private landowners might object to corridors near their property and might resist granting easements for commodity transportation and utility transmission facilities. However, it is doubtful that all of the land identified for disposal would actually be conveyed into private ownership.

From utility corridors:

The utility corridor designations proposed would maximize the opportunities for the development of major rights-of-way.

IMPACTS TO RECREATION RESOURCES

From visual resource management:

Managing the five scenic highways (SR 374 between Beatty and Death Valley National Monument, SR 276 between Scottys Junction and Death Valley National Monument, SR 266 between Lida Junction and the California border, SR 265 between Blaire Junction and Silver Peak, and SR 264 between US 6 and the California border) to retain visual values might limit where and how competitive events cross these highways. Routes would be evaluated on an individual basis as applications for competitive events are received.

The scenic quality of the Lunar Crater SRMA would be enhanced by the increase in size of the protected area from 2,560 to 39,680 acres allowing the inclusion of Black Rock Lava Flow and Easy Chair Crater. This means that all significant features of the SRMA would be managed for their scenic quality. A restriction on vehicle travel to existing roads and trails coupled with a withdrawal from mineral entry, no surface occupancy leasing restriction and denial of nonconforming discretionary uses would provide excellent long term protection for this area.

From wildlife habitat management:

The seasonal restrictions on competitive events between January 15 and May 15 would have no impact because the areas restricted are easily avoided.

From special status species management:

All vehicle use within the 70,600 acres of identified tortoise habitat would be impacted by a use restriction to existing roads and trails and a closure of the washes to use. Because of the size of the Resource Area, the impact is not so much a matter of acres (70,600 is about 1.1 percent of Resource Area) as the specific location surrounding the town of Beatty. Competitive events would still be authorized on the existing cleared course.

From riparian habitat management:

Improvement of riparian habitat benefits recreation resources by improving trout habitat and increasing fishing opportunities. An improved mix of recreational opportunities for the public would result. Limiting vehicle use to existing roads and trails on 9.4

miles of stream (300 feet on each side) would provide long term benefits in terms of improved recreation opportunities.

From forestry and vegetative products:

Restricting competitive off-highway vehicle use events in the Goldfield Joshua tree area to existing roads and trails would limit the possible travel routes around Goldfield.

Establishment of greenwood, and Christmas tree cutting areas could lead to the loss of semi-primitive recreation opportunities on 1,000 acres through the establishment of new roads and trails.

From lands and rights-of-way:

Disposal of 299,140 acres would have little impact on recreation resources. Most of the lands to be disposed of are located in the rural or roaded natural opportunity settings closely associated with towns, ranches and agriculturally developed and altered areas.

If accomplished, the acquisitions at Moores and Pritchards Stations (160 acres each), and Rhyolite (120 acres) would benefit management of these areas as SRMAs and the Morey-Hot Creek Back Country Byway. Managing the Lunar Crater Volcanic Field and the Railroad Valley ACEC as rights-of-way avoidance areas would protect existing scenic values and recreation opportunities.

From ACECs:

The proposed management guidelines and ACEC designations at Lunar Crater Volcanic Field, Railroad Valley, Rhyolite, and Tybo-McIntyre Charcoal Kilns would benefit the management of the areas as SRMAs. Designation of the ACECs as limited to existing roads and trails would have minimal impact on recreation resources particularly off-highway vehicle use. These areas are scattered in small pieces within the Resource Area and should not impact overall off-highway vehicle use to any measurable degree.

From recreation:

Approximately 1,250,290 acres would have restrictions on off-highway vehicle travel.

Limiting vehicle use in the Lunar Crater Volcanic Field SRMA to existing roads and trails would not impact SRMA management and would enhance recreational activities by retaining naturalness and scenic values.

Both Primitive and Semi-primitive opportunity settings would be preserved by limiting OHV use in these areas to existing roads and trails. Because these are classified largely according to their distance from roads and other human activities, any intrusion into these areas, such as off-highway vehicle events would result in the downgrading of the opportunity settings to the next lower opportunity class.

From WSAs:

Interim management of WSAs requires limiting vehicle use to existing roads and trails on 604,535 acres. This is an interim action pending final Congressional resolution of the wilderness designation issue. The interim restriction could remain in place for many years, but would cease to apply when lands are released from wilderness study status by Congress. WSA lands designated as wilderness would be closed to all motorized and mechanical uses.

From mineral exploration and development:

The no surface occupancy proposals

would benefit recreation resources by retaining and enhancing natural environments and scenic features in some of the SRMA/ACECs and wildlife areas by providing for the continued existence of a range of recreation opportunities.

The withdrawal of portions of the Lunar Crater, Lone Mountain, Rhyolite and Railroad Valley areas from mineral entry would benefit recreation resources by retaining and enhancing natural environments and scenic features and providing for the continued existence of a range of recreation opportunities.

IMPACTS TO FLUID MINERALS

From wildlife habitat management:

Mineral leasing would be positively impacted by opening areas previously closed and using seasonal restrictions to protect wildlife values. A seasonal restriction on fluid minerals would apply to that land for the life of the plan. If an oil field or geothermal field was discovered in an area of seasonal restriction, that field would have to go to a maintenance status during the restricted season. Seasonal restrictions would result in the disruption of drilling activities and require a firm drilling schedule. Seasonal restrictions are estimated to impact one geothermal well requiring the well to be scheduled to avoid the restriction.

Opening areas previously closed and using a seasonal restriction in bighorn sheep lambing habitat is very beneficial to the oil and gas program. The high potential land could be leased for oil and gas and the potential oil field, with an estimated yield of five million barrels, could be developed. Oil development would be restricted during the lambing season which would have an adverse affect.

From riparian habitat management:

A negative impact would result on 3,480 acres of land with a high potential for oil and gas in the Railroad Valley ACEC where a no surface occupancy stipulation would be required and a right-of-way avoidance area would be designated. Directional drilling would increase costs by up to 50 percent to drill a well compared to standard vertical hole drilling. The area near Kate Springs Oil Field would be the most adversely affected high potential parcels of land designated for stipulation against surface occupancy. An estimated four wells would not be drilled because of this stipulation.

Some lands which presently have stipulations against surface occupancy (480 acres in Railroad Valley), would be opened without restriction. This would allow for more economical drilling and more efficient development of the oil and gas resource.

From cultural resource management:

Berlin Town Site would continue to be closed to mineral leasing. Mountain View Arrastra, Moores Station Petroglyph, Jumbled Rock Petroglyphs, Cane Man Hill, Tybo-McIntyre Charcoal Kilns, and Rhyolite would be available for leasing with a stipulation against surface occupancy. Since these areas are of low potential for fluid minerals the effect is negligible.

Adverse impacts to the Trap Springs oil field depend on how the section 106 process is implemented, and what requests are made of the oil companies to mitigate cultural resources. The continued closure of the gravel bar road would result in continued use of less desirable access to transport oil from the Grant Canyon and Eagle Springs field to the refinery.

From ACECs:

The stipulation against surface occupancy on 39,680 acres in Lunar Crater ACEC would require directional drilling. The size of the area affected would cause exploration of the center of the parcel to be infeasible.

The stipulation against surface occupancy within the Amargosa-Oasis ACEC (490 acres), Cane Man Hill ACEC (680 acres), Lone Mountain ACEC (14,400 acres), Rhyolite ACEC (425 acres) Tybo-McIntyre Kilns ACEC (80 acres), and 3,480 acres within the Railroad Valley ACEC (15,470 acres) would require directional drilling resulting in increased costs.

From recreation:

Designation of primitive, semi-primitive non-motorized, and semi-primitive motorized areas (894,215 acres) would restrict access to fluid mineral leases to existing roads and trails unless new access was approved. The fluid mineral potential on these lands is 37,500 acres of high potential and 201,000 acres of medium potential. It is estimated that the restrictions would be applied to the drilling of 25 oil wells during the life of the plan.

From wilderness:

A total of 604,534 acres in WSAs are closed to leasing.

IMPACTS TO LOCATABLE MINERALS

From wildlife habitat management:

A 1,440 acre withdrawal in bighorn sheep lambing grounds would remove this land from further mineral exploration and development. The Stonewall Falls withdrawal is located in a moderate mineral potential area. It is estimated that two plan level exploration operations would be precluded in the life of the plan (see the reasonably foreseeable development (RFD) scenarios in this Chapter).

From special status species management:

Designation of 490 acres as the Amargosa-Oasis ACEC to protect the Amargosa toad and Oasis Valley speckled dace would require all exploration to be conducted under a Plan of Operation and mandatory bonding. It is estimated that one operation could be impacted. The withdrawal of 490 acres would remove this area from future mineral location.

From riparian habitat management:

The designation of 15,470 acres at Railroad Valley as an ACEC would reduce the withdrawal to 3,040 and add 440 acres of new withdrawal. This would result in reduction in size of the existing withdrawal and have a positive impact on locatable minerals.

The increased acreage would be open to exploration and development. All exploration in the ACEC would require a Plan of Operation and mandatory bonding.

From cultural resource management:

Designation of 680 acres as the Cane Man Hill ACEC would result in notice level exploration being converted to a Plan of Operation and mandatory bonding. This would impact one operation specifically. This Proposed RMP would limit future management options when the area is withdrawn from mineral entry. Claims currently exist in the area.

The designation of 425 acres as the Rhyolite ACEC would require all hardrock exploration on claims with valid existing rights to be bonded and work under a Plan of Operation. This is expected to impact one operation

yearly. The withdrawal of 126 acres from mineral entry might limit future exploration in the area to the exercise of valid existing rights and require a determination of mining claim validity.

From lands and rights-of-way:

The withdrawal of the Gold Point townsite would adversely affect the current claimants by requiring them to prove discovery under the mining law. The resulting examination would, however, allow BLM to proceed with solving long standing occupancy cases. Currently four operators claim rights to occupy land under the mining laws. The withdrawal would allow BLM to solve ownership rights without further interveners. In addition, each withdrawal reduces the land base from which to explore, develop and mine. This land is permanently lost to the locatable minerals industry.

Withdrawals and closures would impact an estimated 15 exploration projects during the life of the plan. Development of one mine could be prohibited.

Approximately 6,020,948 acres or 98.8 percent of the Resource Area would be unaffected by mineral withdrawals.

From ACECs:

Designation of 39,680 acres (25,600 acres are withdrawn, 14,080 acres open to mineral entry) at Lunar Crater as an ACEC would require all locatable exploration to be done under a Plan of Operation with a mandatory reclamation bond on the 14,800 acres not withdrawn. This is expected to adversely impact two operations on the north side of the ACEC. Validity exams might be required prior to Plan approval. This would impact both the operator and BLM with higher costs to complete the validity exams and complete Plan processing.

Withdrawal of Cane Man Hill, Amargosa-Oasis, Railroad Valley (portion), Rhyolite (portion), and Tybo-McIntyre as ACECs would eliminate mineral development subject to valid existing rights. Exploration under valid existing rights would be done under a Plan of Operation with mandatory bonding. Six operations are expected to be impacted.

Designation of Lone Mountain ACEC would restrict mineral exploration in the Lone Mountain area, and would require all exploration in the ACEC to be done under a Plan of Operation with mandatory bonding. There is some moderate potential lands involved in the ACEC. It has been projected that two operations a year would be impacted.

From recreation:

Vehicle use would be limited to existing roads and trails on 894,215 acres designated as primitive, semi-primitive non-motorized and semi-primitive motorized. New access would be authorized under Notice or Plan of Operations.

IMPACTS TO MINERAL MATERIALS

From cultural resources management:

Cane Man Hill would be removed from the land base from which to sell common variety mineral material. This location is known to contain basalt boulders which are potentially valuable. It is estimated that one potential sale would be lost during the life of the plan if an acceptable alternative site could not be found.

From ACECs:

Mineral material sales would not be permitted on 50,524 acres as follows: Berlin Town Site (704 acres), Project

Faultless (2,560 acres), Mountain View Arrastra (40 acres), Moores Station Petroglyphs (40 acres), Jumbled Rock Petroglyphs (10 acres), Amargosa-Oasis ACEC (490 acres), portions of the Railroad Valley ACEC (3,480 acres), Cane Man Hill ACEC (680 acres), Tybo-McIntyre ACEC (80 acres), Rhyolite ACEC (425 acres), Lunar Crater ACEC (39,680 acres), The Sump (1600 acres), The Gravel Bar (675 acres)(see Appendix 16 for legal descriptions) and facilities in the ERMA (estimated 60 acres, however, specific locations have not been identified). This may result in the increased cost through greater haul distances from alternate sites.

IMPACTS TO NON-ENERGY LEASABLE MINERALS

From riparian habitat management:

The designation of the Railroad Valley ACEC (15,470 acres) would potentially interfere with brine-type development. The 3,480 acres on which there are restrictions against surface occupancy does not preclude solid leasable development. However, it is not likely that a brine type development would be considered compatible with the ACEC. It is estimated one brine type mine would be prevented from development.

From wildlife management:

Apply seasonal restrictions to 72,400 acres. This would impede production scheduling.

From ACEC lands and rights-of-way:

Close 55,360 acres to leasing. It is estimated that one brine-type mine would not be developed.

From wilderness:

A total of 604,535 acres included in WSAs are closed to leasing.

IMPACTS TO ECONOMIC CONDITIONS

From livestock grazing management:

No changes in the administration of grazing on public lands would be introduced, and the livestock grazing program would continue to be guided by previous planning documents. The initial stocking level of 186,839 AUMs has been determined on the basis of previous land-use plans together with adjustments based on evaluation of monitoring data.

Of the total 299,140 acres of public land identified for potential disposal, 289,726 acres are currently available grazing lands, representing approximately 14,500 AUMs. The total loss of the forage provided by this acreage would have a significantly adverse economic impact on the livestock industry in the area, and render severe economic hardship on up to five ranch operators. Gross income to the livestock industry would be reduced by about six percent, or $300,000; and ranch operators would suffer a loss in net ranch income estimated at $76,125.

While this relatively small economic impact would have no significant effect on the regional economy, ranch operators who may be affected would be sorely constrained in their operating discretion, and forced to consider reductions in herd size or the purchase of hay or private grazing to offset the loss of public land forage. Ranchers who are unable to adjust their operations in this manner may be forced to consider going out of business due to the added costs.

It should, however, be noted that the lands proposed for disposal are identified as such to facilitate any potential transfer or disposal action that might come about in response to an identified public need. It is highly

unlikely that the full 299,140 identified acres would be successfully transferred to private or local government ownership, or that a specific purpose or useful and productive application for all these lands would become manifest.

Therefore, the estimation of potential effects on ranch operations represents only a "worst case" scenario. The degree to which ranch operations are actually affected would depend, of course, on which particular acreage, and how much of that acreage, may be sought by private or public entities for what may be deemed a higher and better use. The determination of economic impacts which might result from potential land transfer proposals can only be considered speculative and indeterminate at this time.

From lands and rights-of-way:

The Proposed RMP identifies a total of 299,140 acres of public lands for discretionary disposal to private or local government ownership. While it is unlikely that the total identified acreage would be successfully transferred within the 20-year period, changes within the land ownership pattern which might occur could alter the tax base of the counties to a significant degree. BLM Payments In Lieu Of Taxes would be adjusted accordingly.

In some cases, local governments could suffer adverse financial effects from the transfer of these lands to private ownership, should the tax revenue fall short of the cost of providing any necessary public services. The provision of these services to new areas is likely to require greater capital outlay, and to be less cost efficient, than those contained within existing communities.

From utility corridors:

Because the procedures for right-of-way approval are simplified within designated corridors, the establishment of corridors would result in some reduction of right-of-way planning costs to utility companies. On the other hand, since flexibility in future right-of-way location is limited within designated corridors it is possible that transmission lines could be longer. This might result in more frequent power losses and greater operating costs. In addition, utility system reliability might be affected because designated corridors provide limited opportunity for the separation of transmission lines.

Minor reductions in the value of private lands along future transmission lines could occur. But since the appropriate corridors would be designated well in advance, future development plans could incorporate any necessary considerations. Because transmission lines affect the scenic tranquility of adjacent lands, they are perceived as reducing the value of these lands. Such effects upon land values would likely be limited to the short term, as there is no clear evidence that long term land values are affected by transmission lines (Holberger, et al, 1975).

From mineral exploration and development:

No significant economic impact, either beneficial or adverse, is expected to the minerals industry or to the local economy. Any minerals exploration or development is likely to benefit the regional economy, in terms of income and employment, and minerals development potential under the Proposed RMP remains largely unfettered.

In the Proposed RMP constraints moderately increase the costs of exploration and development that may be born by the minerals industry. Leasing restrictions, for instance, have

an effect upon oil and gas exploration costs due to the constraints such restrictions impose on scheduling and operating efficiency. No evidence is available to indicate that these additional costs have been sufficiently prohibitive to discourage exploration; and no significantly adverse economic effects would result from such lease conditions.

Any increases or decreases in operating costs, that might result from reasonable and moderate resource protection measures, are not likely to have any effect on an individual operator's decision to undertake exploration in a particular area. Such costs are incidental, not prohibitive, and may be found to exist, in one form or another, in every exploration area. Operators generally consider such costs to be a normal part of the cost of doing business.

The major problem underlying the economic evaluation of minerals is the great uncertainty regarding the existence of mineral deposits in sufficient quantity and quality to be commercially feasible. In addition, long-range mineral resource evaluation and market demand estimation are at best speculative. Both mineral resource evaluation and development are directly dependent upon market demands that may be regional, national, or worldwide in scope.

CUMULATIVE IMPACTS

Cumulative impacts result from the incremental impact of the actions, decisions, and projects when added to other past, present, and reasonably foreseeable actions, regardless of what agency or person undertakes such actions. Cumulative impacts could result from individually minor, but collectively significant actions taking place over a period of time.

LIMITS OF ANALYSIS OF CUMULATIVE IMPACTS AND ASSUMPTIONS FOR ANALYSIS

The time frame for analysis is 20 years, which is the anticipated life of the RMP.

The analysis summarizes the increase or decrease in the effect, size or quantity of impacts on the environment from reasonably foreseeable future actions.

All the impacts are on lands and resources within the Resource Area boundaries.

REASONABLY FORESEEABLE ACTIONS

Reasonably foreseeable actions are projects or actions undertaken by any agency or individual that impact public or private lands. The scenarios are based on current trends and an optimistic view for economic development projected into the future. The following projects and actions are identified and considered to be relevant to the assessment of cumulative environmental impacts:

Habitat Management Plans

The magnitude of the impacts from implementing wildlife habitat management plans (HMP) is not known. However, the number of wildlife guzzlers to be constructed would encompass a total of less than 250 acres, and the expected number of spring developments and exclosures would cover an area of less than 300 acres. In addition, the total of all projects planned in HMPs would cover less than one percent of the Resource Area.

Woodland Products

The demand for firewood has averaged 675 cords each year from 1988-1990. Sustained yield for firewood is estimated at 1,000 cords. It is anticipated that future demand would increase until the sustained yield is authorized. A total of 20,000 cords would be sold during the life of the plan.

Rangeland Improvements

There would be 39,785 acres of short term surface disturbance of which 629 acres would persist over the long term from proposed range improvements.

Land Tenure Adjustments

Historically, only seven percent of agricultural entries have gone to patent. For the sake of cumulative analysis it is projected that seven percent of the land identified for agricultural entry would be patented during the life of the RMP. In addition, lands are also transferred into private ownership through mineral entry patents. Since 1981 there have been 11,836 acres patented. It is anticipated that this trend would continue.

There were approximately 4,116 acres identified for possible disposal in the 1981 *Tonopah MFP* of which approximately 1,412 acres have been sold. There was a pool of 47,479 acres identified for possible disposal in the 1986 *Esmeralda-Southern Nye RMP* of which approximately 251 acres has been sold.

For the purposes of cumulative analysis it is assumed that disposal of public lands would continue at the same rate in proportion to the amount of land identified for disposal.

Utility Corridors

It is anticipated that a large electric transmission facility would traverse the Resource Area during the life of the plan. For

the purposes of cumulative analysis it is assumed:

a) generally, right-of-way requirements for a 500 kilovolt (kV) transmission system supported by steel towers is 100 to 250 feet wide.
b) the total length of the right-of-way would be 200 miles, and would enter the Resource Area at its east boundary in Railroad Valley and exit at the south boundary near Beatty.
c) the access road would result in 400 acres of surface disturbance.
d) towers would range from 100 to 150 feet in height.
e) the span between towers would vary from 500 to 2,500 feet.
f) surface disturbance at each tower site would be approximately one-fourth of an acre or a total of 175 acres of surface disturbance which would be revegetated.
g) 700 towers would be constructed.

Las Vegas Valley Water District (LVVWD) Water Filings

LVVWD water rights applications to export ground water from the eastern portion of the Resource Area are being considered by the Nevada State Engineer. The preliminary schedule for development of the project, if the water rights were granted, reflects that construction would not start until 2025. Therefore, development is beyond the life of this plan and is not discussed in this cumulative impacts section.

Reasonably Foreseeable Development Scenario for Oil and Gas

Exploration for oil and gas would continue in the future. This exploration would include seismic surveys, wildcat drilling and development drilling. It is anticipated that 30 wildcat wells would be drilled in the next 15 years and these would lead to the discovery of two additional oil fields. One field would have seven producing wells (Kate Springs Field Model) and the other would be larger and have 40 producing wells (Trap Spring Field Model). Each well would produce between 0.25 and 1 MMBO in its lifetime. It is possible some wells could have a production span exceeding 35 years. Table 4 A summarizes the potential for undiscovered recoverable petroleum resources from two types of plays for fields containing greater than 1,000,000 barrels of oil in the Eastern Great Basin Province east of Tonopah, Nevada (specifically, east of Longitude 117 Degrees W).

The existing surface disturbance related to oil and gas activity is 267 acres. It is anticipated that additional drilling within known oil fields and between producing wells and exploration drilling within one or two miles of the existing oil fields would also be conducted in the future. Existing fields and number of additional wells are: Trap Spring 25, Kate Spring 10, Eagle Spring 8, and Grant Canyon 6 for a total of 49 wells. It is assumed that: 1) drill pads would be 200 x 250 feet (56 acres) with a two and one-half foot layer of gravel, 2) each well would require 1,500 feet of access road 30 feet wide (51 acres) with two feet of gravel, 3) all gravel would be obtained from local pits. Assuming that the material would be removed to a depth of 12 feet (20 acres), 4) an additional two miles of pipeline would be required within the fields (this disturbance would be 15 feet wide and total four acres), 5) tank batteries, if required, would be located on existing pads. The total additional disturbance would be 131 acres.

It is anticipated that 30 wildcat wells would be drilled. The following assumptions are made: 1) drill pads would be 200 x 250 feet (34 acres) with a two and one-half foot layer of gravel, 2) two miles of 30 foot wide access road with two feet of gravel would be required for each well (218 acres); 3) all gravel would be obtained locally and pits are assumed to be 12 feet deep (44 acres). The total disturbance would be 296 acres.

Table 4 A
POTENTIAL FOR UNDISCOVERED PETROLEUM PRODUCTS

Oil Play	Area (Square Miles)	Recoverable Oil Million Barrels	Recoverable Gas Billion Cubic Feet
Tertiary Unconformity	35,000	220	102
Upper Paleozoic	55,000	49	67

It is assumed that there would be two additional oil fields discovered in the Resource Area. These fields are hypothesized to be equivalent in size and surface disturbance to the Kate Spring and Trap Spring Oil Fields.

For an oil field equivalent to the Kate Spring Oil Field the following assumptions are made: 1) twenty-two wells would be drilled and there would be seven producing wells, three injection wells and 12 plugged and abandoned wells; 2) tank batteries would be placed on existing drill pads; 3) this field would require a major access road six miles long and 50 feet wide (36 acres) with three feet of gravel; 4) eight miles of 30-foot-wide service roads (29 acres) would be required with two feet of gravel; 5) drill pads would be 200 x 250 feet (25 acres) with a two and one-half foot layer of gravel; 6) two miles of pipeline would be required with a disturbance 15 feet in width (4 acres); 7) gravel would be obtained locally, and the material would be removed to a depth of 12 feet (19 acres). The total disturbance would be 113 acres.

For an oil field equivalent to the Trap Spring Oil Field the following assumptions are made: 1) eighty wells would be drilled and there would be 40 producing wells, 10 injection wells and 30 plugged and abandoned wells; 2) tank batteries would be placed on existing drill pads; 3) a major access road six miles long and 50 feet wide (36 acres) with three feet of gravel would be required; 4) drill pads would be 200 x 250 feet (92 acres) and would require two and one-half feet of gravel; 5) five miles of pipeline would disturb a 15 foot width (9 acres); 6) there would be 21.5 miles of access roads 30 feet wide (78 acres) with two feet of gravel; 7) all gravel would be obtained from a local source, the material would be removed to a depth of 12 feet (42 acres). The total disturbance would be 257 acres.

It is anticipated that a pipeline would be built from one of the new oil fields to the existing refinery in Railroad Valley. The pipeline would be 25 miles long and would result in an additional 47 acres of surface disturbance, including disturbance at the gravel source.

Because of the possibility of increased production, it is anticipated that the refinery in Railroad Valley would require expansion. The expansion would result in an additional 10 acres of surface disturbance.

The final reclamation of the oil fields would produce a significant amount of both solid and liquid debris and authorized disposal sites would be required. There would need to be three solid disposal sites, two encompassing 30 acres to accept non-hazardous industrial waste, and one 30-acre disposal site which would accept oil contaminated sand and soil.

The total disturbance from future development would be 944 acres, assuming no reclamation. With a total existing disturbance of 267 acres, the 944 acres of additional disturbance would result in a total disturbance of 1,211 acres.

Reasonably Foreseeable Development Scenario for Geothermal Resources

It is anticipated that two 15 MW geothermal power plants would be developed in the Resource Area in the future. Each power plant, assuming development from an undiscovered resource, would require three to seven years from initial interest and exploratory drilling to initial power production. The plant would

operate for 15-30 years and would proceed through the following sequence: 1) 60-80 gradient holes would be drilled in the exploration phase, each 500 to 2,000 feet deep; 2) seven production wells would be drilled, each 10,000 feet deep, 3) feasibility and testing studies would be conducted, 4) site facilities and a power line would be constructed simultaneously.

Geothermal power plants are generally compact and do not have a large impact on the environment. In the scenario discussed above the total surface disturbance would be distributed as follows: a) gradient holes (no disturbance); b) production wells, access roads and drill sites (40 acres); c) production site and facilities (20 acres); d) powerline road (75 acres) for a total disturbance of 135 acres.

It is anticipated that Round Mountain Gold Corporation would need additional geothermal facilities at their existing heap-leach operation. Since this development would be in close proximity to the existing company facilities and roads, additional surface disturbances would be minimal. Three acres of additional disturbance would be caused by two production wells, two injection wells, pipelines, and associated buildings. The wells would probably be 1,000 to 2,000 feet in depth.

With the continued development of precious metal heap-leach operations it is anticipated that one additional geothermal source would be required to heat solutions for a future heap-leach operation somewhere in the Resource Area. The facility would include two 1,000-3,000 feet deep production wells, two 1,000-3,000 feet deep injection wells, associated buildings containing heat exchangers and pumps, and pipelines. It is anticipated that these features would have a surface disturbance of four acres.

It is anticipated that one dehydration plant and ancillary facilities would be constructed in the future. Such a plant would require two or three production wells drilled to a depth of 4,000 to 7,000 feet, and two injection wells of similar depth. This facility would probably be located in a valley and in close proximity to an area that is amenable to crop production (onions, carrots, alfalfa, etc.). The wells and associated pipelines would result in about three acres of surface disturbance. The buildings required for the heat exchanges, warehouse, production, office, etc. would result in an additional 20 acres of disturbance. The facilities are assumed to be located 10 miles from a major road, thus an access road resulting in an additional 48 acres of surface disturbance would also be required. The total surface disturbance related to the dehydration plant would be 71 acres.

It is possible that geothermal resources would be used to provide heat and water for up to two greenhouses. The latter would be used to grow flowers or seedlings. Such facilities would be located in a valley and would result in a surface disturbance of 71 acres for a total of 142 acres.

The recreational aspect of hot springs and wells could not be overlooked as the population increases placing increased demands on resources. It is possible that two or three recreational sites would be developed. However, new surface disturbances related to such development would be minimal.

It is estimated that up to five individuals or companies would attempt to use geothermal resources for such domestic purposes as heating and power generation. Surface disturbances related to these domestic activities would be quite limited and would be related to access roads and/or pipelines. It is estimated that such use would disturb 1.5 acres for a total of 7.5 acres.

Total disturbances related to future geothermal resource development is: Two 15 MW power plants (135 acres); Round Mountain expansion (3 acres); heap-leach operation (4 acres); dehydration plant (71 acres); two green houses (143 acres); and domestic uses (7.5 acres) for a total of 364.5 acres.

Reasonably Foreseeable Development Scenario for Locatable Minerals

Between 1981 and 1991, 67 plans of

operation disturbed 7,794 acres and 890 notices disturbed 2,483 acres. The total current disturbance between 1981 and 1991 is 10,457 acres. A total of 4,081 acres (39%) are reclaimed and 6,376 acres (61%) have not been reclaimed as of 2/14/92.

Development scenarios shown below provide specific detailed information on a number of proposed levels and types of mineral development. This information is used to assist in predicting environmental consequences.

Scenario A
Notice-level exploration

Roads, drill pads, trenches, and cut and fill roads are normal in this operation. Average disturbance of three acres per year per notice. An average drill program would range from one to fifteen holes. A typical pad is 20 feet wide by 40 feet long. Holes are often drilled in roads with the latter serving as the drill pad. Cumulative unreclaimed disturbance could not exceed five acres in a project area. It is projected that 100 Scenario A operations would take place yearly.

Scenario B
Notice-level mining operation

In this operation the miner could be pursuing a placer or lode deposit. A front end loader and D-8 sized dozer might be utilized. Typically, the miner is following high grade mineralization that requires minimal processing facilities. Average disturbance ranges from 2-4 acres per year. Cumulative unreclaimed disturbance could not exceed five acres in a project area. Operations that are mining under this scenario would stay constant. There are 20 such operations currently in the Resource Area. During the life of a plan these operations would relocate, but the acreage would remain constant. This would be 60 acres (20 x 3 = 60) disturbed yearly. These operators are generally located in historic mining districts.

Scenario C
Plan-level exploration

In this operation the mining operator would disturb five to 10 acres of land per year. These projects do not normally last more than 2-5 years. Roads, trenches, and drill pads are the predominant surface disturbances. Exploration programs would involve drilling 15-30 holes yearly. Up to 200 holes might be drilled during the project. Some of these programs could start as a notice and exceed the surface disturbance threshold of five acres. It is estimated that 15 plan-level operations would take place over the life of the plan.

Scenario D
Small-enterprise plan level

In this operation a small-scale operator would pursue a working mine. The small-scale operator might mine a high-grade deposit, old tailings, or a deposit too small for the larger operators. This operation could feasibly be mining building stone, industrial materials, a lode or a deposit of precious metals or gems. The operators would be attempting to operate in favorable economic windows, with little capital investment and low operating costs. This operation might employ one to five people. The total disturbance would be between five and 37 acres. It is anticipated that there would be 24 operations under this scenario during the next 20 years.

Scenario E
Plan-level: small to moderate mine

This operation is an open pit gold heap leach operation. This operation utilizes a leachate such as cyanide. These deposits are typically low-grade, with a cut-off grade of .025 ounces per ton (OPT). These operations could have grades of .05 to .1 OPT, but the high grade would be the exception. In-place gold reserves would be

about 50,000 to 100,000 total ounces. The operations would employ 15 to 40 people, and normal mine life would be 3-6 years. The total disturbance would be between 81 and 140 acres for each operation. It is anticipated that 5 operations under this scenario would take place during the next 20 years.

Scenario F
Plan-level: moderate to large mine

This operation could be for mining base metals, industrial minerals or precious metals or gems. This mine would have one or a series of open pits to pursue the desired commodity. A processing or mill facility would be required. A heap leach pad would only be used for gold operations. The size of the pit, the processing facility and tailings disposal would be dependent upon the commodity being mined. A molybdenum/copper circuit has larger tailings disposal areas than a gold circuit. These operations would likely have a mine life of seven years or longer. The operations could employ more than 40 people. More employees are likely during construction phases of the operation. Water wells, power lines, parking and ancillary facilities would be required. Disturbance would be greatly influenced by terrain and the engineering ability to use the existing topographic features. The projected disturbance would be between 430 and 3,510 acres for each operation. It is anticipated that two operations under this scenario would take place in the next 20 years.

Scenario G
Plan-level: brine mine

This operation would pump one or a combination of the following brines: lithium, sodium, potassium, boron, magnesium, or any metal-bearing brine from the aquifer. A series of evaporation ponds would be constructed. The solution would be allowed to concentrate in the ponds and then run through a mill to remove the desired product. Salt would ultimately be the product left in the pond. Either salt or metal or both are sold as the desired product. It is anticipated that only one such operation would take place during the life of the plan. Projected disturbance would be between 1,630 and 5,415.

Scenario H
Plan level expansion

This is an expansion of an existing mine to take advantage of a new ore deposit, new technology, changing economics, or changing company philosophy. A mine could have more than one expansion during its life. This acreage could be used for a new open pit or pit expansion, new leach pad, facilities, tailings expansion, or waste rock expansions, etc. This model is projected to disturb 120 to 360 acres per operation. It is anticipated that 12 expansions of existing operations under this scenario would take place in the next 20 years.

Scenario I
Plan-level: underground mine

In this operation the operator could be mining base metals or precious metals or gems. An underground mine would require less surface acres. Indirect impacts of subsidence and acid water drainage could result from these operations. The mine and processing facilities could be separated from the mine to take advantage of terrain. These mines typically employ 50 to 175 people and have a life of eight to 15 years. The projected disturbance would be between 90 and 135 acres per operation. It is anticipated that three operations under this scenario would take place in the next 20 years.

Based on a 20 year projection of the above scenarios, the acreage disturbed would range from a low of 12,430 acres to a high of 22,700 acres. As a percentage, this would range from 0.2 percent to 0.4 percent of the lands in the Resource Area. It is important to note that reclamation requirements apply to all of these acreages. The estimated acres of disturbance do not

account for reclamation.

Reasonably Foreseeable Development Scenario for Mineral Materials

Mineral materials extraction would take place as close to the project site as possible. Areas that would require material are the towns of Tonopah, Manhattan, Coaldale, Dyer, Warm Springs, Lida, Ione, Goldfield, Beatty, Silverpeak, Round Mountain, Carver's, Belmont, Scotty's Junction, Tonopah Test Range, and the Blair Junction area. Currently in the Resource Area there are several major paved road systems. These paved highways require maintenance and rebuilding and continued sources of materials. Demand for landscape rock from the cinder cones would continue. Cinder cones are located on US Highway 6 east in the Lunar Crater area, and north of Silverpeak. Yucca Mountain development would create a need for new material sources in the Beatty area. The listing of the desert tortoise as an endangered species could increase demand in the Resource Area if mineral deposits in Las Vegas and Pahrump conflict with the tortoise habitat.

Gravel pits would have one or two D-8 sized dozers, one or two front-end loaders, numerous haul trucks, a screening plant and possibly an asphalt batch plant. This operation would disturb 10 acres of land. The pit would be stripped of vegetation and top soil and this material would be stockpiled. Extraction would then begin in desired areas, hauled to the screening plant and batch plant and then transported to the project. Waste material would be blended into depleted areas of the pit. A highway department job would leave stockpiles of product in the pit for future use. A mining operation could last from several days to several months. Upon cessation of the mining in the pit, the walls would be sloped to 3:1, and all equipment and trash removed, and topsoil replaced.

There are currently 7,002 acres in the Resource Area set aside for NDOT in the form of material site rights-of-way. Not all of this acreage would be used in 15 years. BLM pits and known county pits add up to 222 acres for a total of 7,224 acres of land that could be developed without new authorizations.

Some land is already disturbed by gravel pits. It could be expected that these pits would be expanded, and that the average pit size would grow. Based on projections 20 years in the future, 200 existing pits would disturb 2,000 acres, and 100 new pits would disturb 1,000 acres for a total disturbance of 3,000 acres.

Reasonably Foreseeable Development Scenario for Non-Energy Leasable Minerals

The exploration and mining scenarios generated for locatable minerals are used to explore the potential impacts of the development of this resource.

During the life of this plan, five prospecting permits would be received. A prospecting permit would equate to a Scenario C. A permit would be received in each of the following areas: Alkali Flats, Columbus Marsh, Clayton Valley, Railroad Valley, and Smoky Valley. These are two-year projects to drill and evaluate the potential for these minerals. It is projected that only one permit would result in lease issuance. That lease is projected to be for a valuable mineral which has been found, identified, and would be developed. A total of 50 acres would be disturbed in this scenario. One Scenario G mine would be developed with a disturbance of 5,500 acres. Total disturbance from exploration and mining would be 5,500 acres.

IDENTIFICATION OF RESOURCES IMPACTED CUMULATIVELY

Cultural Resource Component

To determine cumulative impacts, a computer file was created that included the number of acres surveyed, the number of cultural resources recorded, and the benefitting activity for 736 Class III surveys (i.e., complete as opposed to sampling surveys) performed in the

Resource Area between 1975 and 1991. The data in this file were used to calculate the site density per acre for each benefitting activity (Table 4 B). These figures were then used to estimate the number of sites that might be impacted as a result of the different activities. Virtually all cultural resources surveys performed in the Resource Area have been project driven. No systematic effort has been made to survey the Resource Area, or specific environments or hydrographic basins, to develop statistically valid samples from which site frequencies and densities could be accurately extrapolated from one area to another. Consequently, the cumulative impact figures presented in Chapter 4 should be considered as best estimates only.

The figures provided are for all classes of sites, regardless of type (i.e., isolated artifacts and small sites, or large, complex historic and prehistoric properties). Derivation of numbers for specific types of properties using Resource Area files would have been exceptionally difficult given the different definitions of sites used by various researchers over the years. Inclusion of all sites in the cumulative impact analysis eliminated the need for intensive examination of reports in an attempt to control for differences in site definition.

The figures presented are for all sites regardless of their National Register status. In many early reports, cultural resources were not evaluated for potential inclusion in the National Register if the site(s) could be avoided. This policy resulted in systematic under-recording of some sites, and under-representation of potential National Register properties in Resource Area files. In the State of Nevada, approximately 12 percent of all sites are found eligible for inclusion in the National Register. This figure could be used to calculate the approximate number of eligible cultural properties that might be affected by a given activity.

Where site density figures were not available for a specific activity (e.g., woodland harvesting) the overall site density for Class III

Table 4 B
SITE DENSITY PER ACRE BY BENEFITTING ACTIVITY

Benefitting Activity	Number of Survey Sites	Number of Acres Surveyed	Site Density Per Acre
Rights-of-Way and Lands	45,434.9	817	0.0180
Rangeland Management	10,876.8	384	0.0360
*Recreation	372.6	20	0.0563
*General Habitat Management	167.4	16	10.1255
*Wild Horses & Burros	52.5	8	0.1524
*Cultural	7,156.4	58	0.0081
Oil and Gas	28,324.6	962	0.3396
Locatable Minerals	20,256.1	442	0.0218
*Geothermal	482.5	21	0.0435
*Mineral Materials Sales	348.9	16	0.0459
*Non-Energy Minerals	9.7	2	0.2062
Overall Site Density	113,791.3	2,746	0.0241

*Note: The overall site density was used to calculate cumulative impacts for these activities because of the relatively small amount of acreage surveyed.

surveys in all environments was used to provide an estimate of the numbers of sites that might be affected. In all cases, it should be kept in mind that the figures presented are not based on statistically valid samples of the Resource Area, and are therefore, only best approximations of the numbers of cultural resources that might be impacted by a particular activity.

When performing the cumulative impact analysis, it has been assumed for the purpose of Section 106, that the information potential of all sites within the specified acreage would be destroyed by the activity being discussed. It is recognized that not all sites would be adversely affected to the same degree, and that it would be possible to avoid direct impacts to some cultural resources altogether. It should be noted that controlled excavation, collection, and other data gathering activities are viewed here as having a negative effect on cultural resources. While collection and analysis of data from sites benefit the scientific community by providing new information that could be applied to a variety of problems, methods used to gather these data are frequently destructive of the cultural resources themselves.

Physical Component

The reasonably foreseeable future actions would cause surface changes.

Harvest of woodland products in greenwood cutting areas would be naturally reforested and impacts would be of short duration.

Proposed rangeland improvements would disturb 39,785 acres of which 16 acres would not be revegetated.

Construction of a major electric transmission line across the Resource Area would disturb 575 acres of which 400 acres would be in permanent roads.

Future oil and gas exploration and development would disturb 944 acres.

Future development of geothermal resources would disturb 362.5 acres which would be dedicated for the life of the plan.

Locatable mineral exploration and development could disturb up to 24,650 acres most of which would be in mining districts and around existing mines and half of the disturbance would not be cumulative.

Future exploration and development of non energy leasable minerals would impact 7,750 acres.

Mineral material sales would disturb 3,000 acres. As gravel pits are expanded, the depleted areas are reclaimed.

In the Proposed RMP approximately 75,600 acres, 1.2 percent of the Resource Area, would be disturbed during the life of the RMP. Most disturbed areas would be reclaimed or revegetated during the life of the RMP leaving approximately 22,000 acres to be reclaimed.

In the Proposed RMP, an additional 36,935 acres would be transferred into private ownership. Transfer of land into private ownership would be permanent commitment of resources.

Biological Component

Actions taken to implement activity plans for wildlife, livestock and wild horses and burros would directly impact less then one percent of the Resource Area. These actions are designed to reach objectives for specific areas and involve projects and management action designed to maintain or improve surrounding rangeland conditions.

Rangeland vegetation manipulation projects and firewood harvest areas would be in homogeneous, less productive vegetation types with poor understory vegetation. These projects would increase cover, reduce erosion, improve rangeland conditions and wildlife habitat. The end result would be an increase in biological diversity on sites with undesirable plant communities.

The lands program would permanently commit wildlife habitat and/or eliminate vegetation. The impacts would be a long term decrease in non-descript federally managed wildlife habitat on 0.6 percent of the Resource Area.

Mineral exploration and development would displace wildlife from sites for the duration of operations. Many species such as song birds could acclimate to on-going disturbances with little consequence other than loss of habitat. Wild horses and burros could also acclimate to on-going disturbances. Vegetation would be temporarily removed at mineral development sites and access routes to mineral activities and represent direct habitat loss to wildlife species. Reclamation of disturbed areas would be required for all levels of mineral activity to ensure that undue and unnecessary degradation of the environment does not occur. It is estimated that the acreage disturbed in mineral activities would fragment 50 percent more acres as are currently disturbed and not reclaimed. At most, 46,539 acres, 0.8 percent of the Resource Area, of wildlife habitat would be fragmented or destroyed.

Due to the low productivity of the vegetation types in the Resource Area and the low population densities of wildlife, impacts would not be severe as long as disturbing activities do not occur on 74,345 acres of important wildlife habitats.

Social and Economic Component

No cumulative social or economic impacts may be inferred to result from implementation of the Proposed RMP. No alteration of the area's social or economic structure may be expected.

Minor population, income, and employment effects would be unnoticeable. The basic structure of the local economy and social organization would remain intact.

Minerals exploration and development has been, and would continue to be, ongoing within the Resource Area. The Proposed RMP would not provide sufficient inducement or discouragement to effect a significant change in the plans or perceptions of that industry. The industry may be expected to continue its efforts, in the present manner and trend, subject to the usual business and economic influences. International minerals markets and prices would continue to influence the "boom-bust" cycle of minerals production and render a degree of economic instability.

No unusual population, income, or employment impacts are foreseen. While the population is expected to continue to increase throughout the life of the RMP, any expanding community requirements for the acquisition of public land through direct sale, exchange, R&PP transfer, lease, etc., are well anticipated and accommodated.

Livestock grazing may suffer some loss of AUMs due to land disposals and surface disturbance from minerals activities. Some individual ranch operators could experience constraints on their operating discretion due to loss of public land forage. However, such losses as may occur cannot be specifically identified, or tied to an individual ranch operation at this time. The overall effect on the livestock industry or the economy of the region is not expected to be consequential.

CHAPTER 5

CONSULTATION AND COORDINATION

INTRODUCTION

This chapter summarizes the consultation and coordination conducted in the preparation of the Tonopah Resource Management Plan and Final Environmental Impact Statement. In the course of preparing this document, formal and informal efforts have been made to involve the public, other Federal agencies, and State and local governments in the planning process per 40 CFR 1502.25 and 43 CFR 1610.3.

PUBLIC PARTICIPATION

Several points of public involvement are mandated by federal regulations; several other actions were taken to further involve the public.

Prior to actual writing of the document, an involved process of preparatory activities occurred. This procedure included data assembly, public participation, interagency coordination, and preparation of an analysis of the management situation. Consultation and coordination with agencies, organizations, and individuals occurred in a variety of ways throughout the planning process. A complete mailing list of those contacted throughout the planning process is on file in the Tonopah Resource Area office.

The public participation process began in February, 1990, with a publication of a Notice of Intent to prepare a Resource Management Plan in the Federal Register (Volume 59, No. 29, February 12, 1990). On February 13, 1990, a scoping letter was sent to over 400 individuals, State and Federal agencies, units of local government, and members of private industry. This letter invited comment on planning issues, planning criteria, management, and resource concerns identified by BLM Managers and Resource Specialists. The letter also announced three informal public workshops to be held in March, 1990 in Tonopah, Carson City and Las Vegas to receive public input. The public was encouraged to become involved in the planning process, and to submit comments any time during the development of the plan. Announcement of the public workshops was also made through local newspapers.

The first meeting was held on March 1, 1990, in Tonopah, Nevada; the second was held on March 6, 1990, in Carson City, Nevada; and the third on March 8, 1990, in Las Vegas, Nevada. BLM personnel assigned to prepare the RMP were present at each meeting to explain the planning process and issues, and to discuss the concerns of those in attendance. Over 80 people attended the three meetings. During the scoping period, 74 comment letters were received.

On June 1, 1990, a letter was sent to approximately 190 interested individuals, agencies, and groups who had responded to the scoping letter. The letter summarized the results of the scoping process, identified the planning criteria to be used in the development of the RMP, and identified the planning issues to be analyzed in the RMP. An update letter was mailed to interested parties on May 3, 1991 to inform them that work was progressing on development of the alternatives to be considered in the Draft RMP/EIS.

CONSULTATION

Various Federal, State and local agencies have been consulted throughout the planning process. Information, ideas and interpretations were exchanged through formal and informal meetings, telephone conversations, and correspondence.

PUBLIC REVIEW OF THE DRAFT AND PROPOSED PLAN

The Draft Tonopah Resource Management Plan and the Environmental Impact Statement was published and made available to the public on June 4, 1993 for a 90-day public comment period which ended on October 1, 1993. Approximately 200 individuals and organizations had expressed an interest in use and management of public land in the planning area. All were sent copies of the Draft Resource Management Plan/Draft Environmental Impact Statement. Included in this group were all grazing permittees and lessees within the planning area, Nevada Congressional Delegation, appropriate members of advisory councils and boards, and various libraries.

The Notice of Availability was published in the Federal Register on Thursday, June 24, 1993 (FR Vo. 58, No. 120). Public meetings to solicit public comment were held in Carson City, Nevada on August 17, 1993, in Las Vegas, Nevada on August 19, 1993, in Beatty, Nevada on August 24, 1993, in Goldfield, Nevada on August 25, 1993, and in Tonopah, Nevada on August 26, 1993. There were 13 attendees at the Carson City meeting, nine at the Las Vegas meeting, 12 at the Beatty meeting, 28 at the Goldfield meeting, and 41 at the Tonopah meeting.

A total of 93 timely comment letters were received during the 90-day comment period for the Draft RMP/EIS. Each letter was reviewed and substantive comments which were concerned with the facts or analysis presented in the Draft RMP/EIS were evaluated. Copies of most of the comment letters are printed at the end of this Chapter followed by responses to the substantive issues raised. Attachments to the comment letters have not been reproduced in this Chapter. However, they are available for review at the Tonopah Resource Area office. In addition, for comment letters where the body of the letter was over 10 pages in length, the substantive comments were excerpted and printed along with the rest of the comment letters. Complete letters are available at the Tonopah Resource Area office.

Each issue in the comment letter identified for response has been assigned a number in the left margin. The response to each issue, with corresponding number, follows in the response section of this Chapter. In addition, eight other letters were received after the close of the comment period. Comments in these letters were considered, however, they were not reproduced in this document.

On December 9, 1993 a letter was sent to each timely respondent acknowledging receipt of their comment letter. This particular letter informed the respondent how the comments would be evaluated, and incorporated into the Proposed RMP/Final EIS.

Formal consultation was conducted with the US Fish and Wildlife Service in accordance with the Endangered Species Act. The Biological Opinion on Implementation of the Proposed Plan is reproduced in Appendix 18.

This Proposed RMP/Final EIS is being distributed to approximately 300 addresses, including agencies, organizations, and political entities. Copies of the complete mailing list, including individuals, are on file at the Tonopah Resource Area office. A number of requests for copies of the Draft RMP/EIS were received from the public and have been added to the mailing list for distribution of the Proposed RMP/Final EIS. The Draft Tonopah RMP/EIS and Proposed RMP/Final EIS were made available to the general public and the following:

Congressional Delegations

Honorable James H. Bilbray
Honorable Richard H. Bryan
Honorable Harry Reid
Honorable Barbara Vucanovich

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
    Forest Service
    Soil Conservation Service
Department of Defense
    TFWC/DA Nellis AFB

Department of the Interior
- Bureau of Indian Affairs
- Bureau of Mines
- Fish and Wildlife Service
- Geological Survey
- National Park Service
- Office of Environmental Affairs

Environmental Protection Agency

State Agencies

Nevada Department of Wildlife
Nevada Department of Minerals
Nevada State Clearing House
Nevada Commission for the Preservation of Wild Horses
Office of the Governor

Local Government

Beatty Town Board
City of Gabbs
Nye County Commissioners
Nye County Planning Department
Esmeralda County Commissioners
Tonopah Town Board

Native American Councils

Las Vegas Colony Council
Lovelock Tribal Council
Reno Sparks Indian Council
Shoshone Paiute Business Council
Summit Lake Paiute Council
Tribal Council of the Te-Moak Western Shoshone Indians of Nevada
Washoe Tribal Council
Wells Indian Council
Yerington Tribal Council
Yomba Tribal Council

Public Libraries

Beatty Community Library
Clark County Library
Elko County Library
Esmeralda County Library
Gabbs Library
Lander County Library
Lincoln County Library
Manhattan Town Library
Mineral County Library
Nye County Library
Round Mountain Public Library
Silver Peak Library
State of Nevada Library
University of Nevada Library, Las Vegas
University of Nevada Library, Reno
White Pine County Library

Interest Groups and Organizations

Animal Protection Institute of America
American Rivers
Audubon Society
Best in the Desert Racing Association
Central Nevada Historical Society
Desert Bighorn Council
High Desert Racing Association
Humane Equine Rescue and Development Society
The Nature Conservancy
Natural Resources Defense Council
Nevada Cattlemen's Association
Nevada Council of Professional Archaeologists
Nevada Land Action Association
Nevada Mining Association
Nevada Miner's and Prospector's Association
Nevada Off-Highways Users Council
Nevada Outdoor Recreation Association
Nevada Sportsman and Outdoorsman Association
Nevada State Rifle and Pistol Association
Nevada Trappers Association
Nevada Wildlife Federation
Nevada Wild Horse Commission
Sierra Club
U.S. Humane Society
Wilderness Impact Research Foundation
The Wilderness Society

Bureau of Land Management Offices

All Nevada BLM offices

1

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Carson City District Office
1535 Hot Springs Road, Suite 300
Carson City, Nevada 89706-0638

In reply refer to:

1600
(NV-03337)

JUL 15 1993

Memorandum

To: Area Manager, Tonopah Resource Area

From: Area Manager, Walker Resource Area

Subject: Draft Tonopah RMP

District and Area staff specialists have reviewed the subject draft and offer the following:

1-1 1. The right-of-way corridor identified on Maps 25, 27 and 29 that approaches the Mineral-Esmeralda County line in the vicinity of T. 2 N., R. 34 E., has no corresponding corridor in the Walker Resource Area.

1-2 2. Map 20 appears to show the Stewart Springs Allotment to be part of the Ione Allotment. Even though the Stewart Springs Allotment is administered by the Tonopah Resource Area and is grazed by the Yomba Tribe, given the confusion that has surrounded this allotment in the past, it seems advisable to ensure that it is depicted accurately. A suggested modification is shown on the attached copy of Map 20.

1-3 3. Map 20 also shows a small triangle south of the Stewart Springs Allotment and southwest of the Nye-Mineral County line to be part of the Ione Allotment. This appears to be the Humdinger Spring parcel. Given the on-going discussions/controversy regarding Humdinger Spring, it is particularly important that this area be depicted accurately.

J. Matthiesen

1 Attachment
1. Map 20 with Changes

cc: State Director, Nevada (NV-930)

2

P. O. Box 803
Socorro, NM 87801

July 13, 1993

RMP Comments
U. S. Bureau of Land Management
Tonopah Resource Area Manager
P. O. Box 911
Tonopah, Nevada 89049

Dear Sir or Madam:

I have reviewed the draft Tonopah Resource Management Plan and Environmental Impact Statement and would like to offer the following comments for consideration. I think I understand the difficulty and effort required to prepare documents of this scope and magnitude and that some matters might be overlooked. I guess that like many specialists, I am a bit biased towards those areas of greatest interest to me, geology and paleontology, and I plead guilty.

I must, therefore, express concern that these components of the natural environment have been given almost no treatment in the draft document. Virtually no mention is made of the geology of the area covered by the document. No mention is made of the rock units included, no geologic column is provided, no geologic map is provided, and mineral resources are not related to the basic geologic framework of the region. I strongly urge that this glaring omission be remedied.

I am also concerned that the paleontology of the Resource Area is not treated at all except by the note that a paleontological study was once done and is now considered inadequate and a new survey is needed. The Tonopah resource is actually highly regarded for the diversity and quality of its fossil resources. The area contains in situ Miocene fossil forests, leaf localities, fossil mollusks, ostracodes, fish, and a very significant mammalian fauna. Fossil logs are documented that are simply gigantic. There is a diverse literature related to the paleontology of the area, and I find it difficult to understand why this ancient resource, many millions of years old, has been ignored in the draft document. Surely, the published record must be known to the drafters of this document.

It is my view that a number of steps should be taken to remedy these shortcomings before the document can be considered to be adequate.

2-1 First, the geology of the Resource Area should be documented and an adequate geologic map included. This discussion should include an outline of the geologic history of the Resource Management Area (RMA), a discussion of the rock units, surficial geology, and should certainly have an appropriate stratigraphic column. There should be a discussion of any known geologic hazards, where the sand and gravel operations, abandoned mines, etc., are located and certainly, a discussion of the economic geology of the area is in order. With not much difficulty some reasonable assessment of the likely market conditions that will determine the development of economic resources would be in order and not difficult to generate.

2–2 Secondly, the paleontology of the RMA must be addressed by a complete and adequate discussion of the fossil resources previously found, the current distribution of fossils, the significance of what fossils are currently known from where, and a map showing fossil occurrences in terms of location and geologic unit involved. I certainly would encourage some effort to survey the area for fossil occurrences and the need to make some determination of the significance of the resource. Mention should be made of fossils previously collected from the RMA and in so far as is possible, who collected what and where are the collected fossils currently housed.

2–3 Thirdly, an assessment of the significance of the fossil resource should be made in terms of an overall plan for managing the resource. This management could include a broad management philosophy that would encourage scientific study of the fossil resource, development of an educational program in concert with the interested amateur community of "rock-hounds" and "rock-hound clubs" and a determination of possible impacts to the resource by possible mineral development or other competing land use activities. Again, it is very likely that any possible conflicts could be worked out with minimal impact to the interests involved.Any program to accomplish these goals should be in cooperation with BLM staff and utilize their field expertise.

I just cannot understand why the areas of geology and paleontology were ignored in the document. Most of the work that would be need is very basic and could be conducted in a reasonable length of time at very modest cost.

I intend for these comments to be as constructive as possible, and I hope they are received as such.

Sincerely,

Donald L. Wolberg, PhD
Paleontologist

cc: State Director
Jim Baca

3

1116 South Gray
Stillwater, OK 74074
July 25, 1993

RMP Comments
U.S. Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Dear Sirs:

In regards to "The Tonopah Resource Management Plan" and "Fossils in the Tonopah Resource Area":

First, I am delighted that rockhounds are being given a chance to voice opinions in this matter.

3–1 I would prefer having a detailed inventory of the known paleofloral and paleofaunal sites in the Esmeralda Formation done. If help is needed, there are many rockhounds who specialize in petrified wood, and fossils who would be delighted to have a chance to see an area like this, who would also appreciate a chance to help.

Is it possible to designate the area so that research can be done in it, but still have it remain open to anyone other than professional paleontologists? I would like the area to be preserved so that more people can appreciate it in person--not just in articles professional people write.

If the large logs are removed, I would hope that they were removed to a place where people can see them, and that they are not stored somewhere and just left in storage until somebody in the year 3000 has time to study them.

One of the quotations from the literature that was included with the information I received mentions that "standing, silicified trees are slowly disintegrating." --that was in 1978. I wish there could be some way that these petrified trees could be preserved, rather than having to let them become chips and dust.

Yours truly
Ruby Lingelbach

Ruby Lingelbach, Editor, Rocky Mountain (Federation) News

Copies to: Mr. Christopher Stubbs
BLM State Director
Edward S. Slagle
John T. Alf

4

1116 S. Gray
Stillwater, OK 74074

July 24, 1993

RMP Comments
U.S. Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Dear Sirs:

This is in reference to the proposed Tonapah Resource Management Plan. As a card carrying rockhound, I'm concerned about what course of action is planned for this area.

4-1 I'm definitely against any action that locks the area up so that the general public is not able to enjoy their public land. However, since the area contains some unique and unusual specimens of petrified wood logs and possibly other fossilized plants, there would need to be some kind of action to preserve these unusual specimens. Then again, the area should be open to non-commercial surface collecting of the more common specimens.

Naturally, additional inspection and possible mapping of the area should be performed and here rockhounds could be utilized to provide some of the labor under the direction of a qualified geologist or paleontologist. If in designating this as a Research Natural Area,
4-2 it is only open to professional people, then I would oppose such a designation. If such still allows access by the general public, (maybe with some constraints), then such designation would be acceptable.

Whatever decisions are made, I hope they include the interest of the amateur rockhound and that they are advised of those decisions.

I look forward to hearing what action is being planned for this area.

Sincerely,

Dan Lingelbach

Dan Lingelbach

Past President
Rocky Mountain Federation
of Mineralogical Societies

5

Tonopah Divide Mine,
Divide (Gold Mountain) Mining District,
Esmeralda County, Nevada

Executive Office:
117 Crescent Street
P.O. Box 778
Greenville, California 95947-0778
(916) 284-6191

TONOPAH DIVIDE MINING COMPANY

INCORPORATED IN NEVADA, JUNE 3, 1912
80 Bitterbrush Road
P.O. Box 10622
Reno, Nevada 89510
(702) 345-7599

August 5, 1993

RMP Comments
Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Dear Sir:

Thank you for sending us the draft Tonopah Resource Management Plan. We have read it and are very impressed with its scope and professionalism. The Plan appears to be well written and well thought out and well balanced among all the relevent concerns. We have no serious concerns regarding mining requirements as drafted in the preferred alternative 4.

We would like a copy of the final Plan when it is available. Please send it to us at the above Greenville, CA executive office address. Thank you.

Very truly yours,

Norman A. Lamb,
Secretary-Treasurer

6

9 August 1993

BLM/Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 85049

Subject: Draft Tonopah Resource Management Plan and Environmental Impact Statement - RMP Comments

6-1 Summary 7 - Locatable Minerals - Alternative 4 Preferred Action "A total of 93.8 percent of the resource area would be open to mineral entry." is wrong. If because of proposed restrictions, Alternative 4, a vehicle cannot be used to prospect in 21% of the resource area, you are restricting mineral entry.

6-2 Map 46, Item 5 is incorrect. The area shown around Goldfield is currently not limited to roads, trails and washes. You should have added the words "competitive events". For your ready reference, enclosed are pages 15 and 16 of your current Management Guidance which states "Planning Area A - Goldfield Joshua Tree Forest, 100,000 acres (competitive events limited to existing roads, trails, and washes)".

6-3 Map 52, Alternative 4 proposes ten closed areas only four of which are WSA. Under the current regulations isn't vehicular traffic allowed on existing roads in Wilderness Study Areas?

6-4 Map 52, Categories 2 and 3 "limited to existing roads and trails" include many areas which are directly in conflict with Categories A and B, high and moderate locatable mineral potential, Map 62.

It is my recommendation for the economic well-being of not only Esmeralda and Nye Counties, but also the State of Nevada, that Alternative 2 be adopted for Mineral Exploration and Development, "Management will provide for mineral exploration and development with the least restrictions necessary to protect key resources, and to prevent undue or unnecessary degradation of the environment." To achieve this objective, Alternative 2 would have to be used for Off-Highway Vehicle(OHV) Use, Special Management Areas, WSA's Returned to Multiple-Use, Cultural Resources, Areas of Critical Environment Concern, Recreation and Fluid Minerals.

No permit system or fees should be instituted for the use of vehicles on public lands except possibly in case of competitive events.

Richard C. Davis
4274 Mulligan Drive
Carson City, NV 89701 and
Box 34, Goldfield 89013
702-885-7624

7

August 13, 1993

MAKOIL

RECEIVED
TONOPAH RESOURCE AREA
TONOPAH, NV

Mr. Billy Templeton
United States Dept. of the Interior
Bureau of Land Management
Nevada State Office
850 Harvard Way
Reno, NV 89520

Tonopah Resource Management Plan
and Environmental Impact Statement

Dear Mr. Templeton:

Makoil, Inc. has been producing oil in Nevada (Railroad Valley) since 1983. We are still actively drilling in Nevada and hope to continue in the future.

All of our existing producing wells are currently located in Railroad Valley and are identified as the Trap Springs field. Many of the alternatives in the RMP/EIS draft pertain to our producing field in Trap Springs and many of the other valleys in which we have leased BLM land. There are several areas of concern in this document that need to be addressed and we plan to submit our oral and written comments at the August 19, 1993 meeting in Las Vegas, Nevada. However, we believe that it is necessary to address several issues in advance of this meeting. Our written comments will be sent to the Tonopah Resource Area Manager prior to the conference on August 19, 1993.

The RMP/EIS is a very formidable document. After reading the list of "Preparers", it is obvious that this document was started in 1990. Judging from the list of preparers, the size of the document and the time it took to complete the draft of the RMP/EIS, suggests that a sizeable cost has gone into the preparation of this document. Since alternative 4 is the preferred alternative, one can only assume that this document was prepared to justify alternative 4. Since this document was conceived and prepared under the guidance of Mr. Theodore Angle, we can only assume that he favors alternative 4. It therefore appears, that a final decision on the utilization of this document will come from Mr. Billy Templeton, State Director, Nevada. This is why our comments are currently being directed to your office.

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Please consider the following observations:

7-1 1. We believe that the RMP and the EIS should be considered separately in their independent context. We recognize the importance of an Environmental Impact Statement in this day and age and feel as though it is a necessity to provide written documentation concerning environmental questions on federal lands. However, we do not feel that the Resource Management Plan should be so closely tied to the EIS that they become one document and one supports the other. The Resource Management Plan should be directed towards the effective and efficient management of 6.1 million acres of public lands. Obviously, environmental considerations are made in managing this land, but they must not be the controlling mechanism of effective management.

2. In the course of preparing this document, formal and informal efforts were made to involve the public, other federal agencies and state and local governments in the planning process. Since the greatest economic impacts are going to be on grazing permittees, oil and gas lessees, and mineral lessees, it would appear that these entities should also have had an intimate interest in the preparation of this document. 7-2 Our company was not asked to participate in the formulation of this document. We were sent a copy of the RMP/EIS two weeks ago. However, Chapter 5 lists all federal agencies, state agencies, local government, native-American consuls, public libraries, and 27 agencies and associations to whom copies have been sent.

3. Many of the issues which separate "no action" alternative number 1 from alternative number 4, require additional man power, resources and funds. Since alternative 4 is the preferred action plan, has an economic impact study been made to determine the additional cost required for either alternative 2, 3, or 4? We know what alternative number 1 7-3 costs, because that is the current plan. In view of the extreme cost cutting which must take place in order to satisfy the President's reduction policy, will there be sufficient funds in the BLM to satisfy the implementation of alternative number 4? The current measures in the Budget Reconciliation Act levy a heavy toll on additional spending. In our opinion, the "no action" alternative number 1 offers the most flexibility for future resource management. Each problem is solved on an individual basis as it occurs. By attempting to detail all of the existing and potential problems that might occur within the resource area with alternative 4, we feel that the BLM is tieing itself to a plan that they must follow during the next 20 year period.

4. It should be pointed out that in comparing each of the alternatives, there is a great deal of repetition. In many

instances, much of alternative number 4 is already being implemented.

5. There is so much duplication between each of the alternatives and the Environmental Impact Study that it further emphasizes the fact that these two studies should be reviewed separately and not be included in the same package.

6. Our company operates primarily in Railroad Valley and specifically in the Trap Springs area. In each of the alternatives, the Trap Springs/Gravel Bar area receives an inordinately large amount of attention. We are particularly disturbed with the amount of attention that the Trap Springs area is receiving from the cultural resources management point of view. In every alternative, your interim management directions for archeological districts in northern Railroad Valley will result in restricting fluid minerals development and prohibiting discretionary surface disturbing activities in 7-4 the Trap Spring/Gravel Bar area until such time as a comprehensive research protocol can be developed and implemented. During the past ten years, we have painstakingly reviewed all of our drill sites with contract archeological personnel and have avoided any areas which might have cultural resources associated with them. It should be pointed out that these cultural resources appear to be primarily shards of broken indian pots or pieces of broken arrowheads. In every instance, these appear in very selected areas and are not general to all of the Trap Springs area. It appears to us that each of these documented sites can continue to be avoided and the development of the Trap Springs field continued.

As pointed out in the standard operating procedure section of alternative number 4 (page 2-55), "Avoidance of cultural 7-5 properties is the preferred mitigation." We have done this in the past and we feel that this same technique will be successful on future drill sites. This would preclude the insistence on no occupancy of federal lands that have substantial producible oil and gas.

7. Makoil currently has several thousand acres under lease for development in the Trap Springs field. It is our intention to continue to drill up this acreage over the next five to ten 7-6 years. If the associated alternatives are implemented, Makoil will not be able to develop this leased acreage because of the limitation of the use of existing roads. Makoil has paid a bonus for this leased acreage and has been routinely paying a yearly rental for these leases. These leases were acquired on the basis that Makoil would be allowed to drill on this 7-7 acreage. If any one of these alternatives are accepted, Makoil will be prevented from being able to actively drill for oil on a large portion of our currently leased acreage. It is being proposed that the Trap Spring field be considered an archeological district in northern Railroad Valley and there

is a possibility that the BLM will designate Trap Springs as a protected riparian, wildlife and/or threatened species habitat. We would like to see the documentation which suggests that the Trap Springs area supports endangered wildlife, migratory birds and/or animals or is a unique and critical habitat for any animals. There is also a proposed 3,480 acres which are being considered for no surface occupancy. Once again, we find no evidence that this acreage is so critical as to suggest no surface occupancy. 7-8

8. The RMP/EIS indicates that "no land uses will be authorized which are incompatible with the areas values". If the Trap Spring area is considered for protected habitat status, would all existing oil and gas operations be concluded in this area? In alterative number 3 there is a recommendation to designate 8,480 acres as areas of critical environmental concern in Trap Springs. In alternative number 4 it is recommended that 15,470 acres in Railroad Valley be designated as areas of critical environmental concern. It is important that the lease holders of this acreage be given ample opportunity to prove that this acreage should not be considered as areas of critical environmental concern.

9. We find the entire Resource Management Plan alternatives to be contrary to President Clinton's proposed Domestic Energy Initiative. The Domestic Energy Initiative was proposed by Department of Energy Secretary Hazel O'Leary in April as a coherent set of policies which would provide for increased production on natural energy resources while maintaining a strong environmental protection commitment. Secretary O'Leary indicated that the Energy Department was looking for ways to:

   a. Decrease dependence on oil imports.
   b. Increase gas supply and demand.
   c. Reduce exploration and production costs.
   d. Reconcile environmental/energy differences.

   The intention of this initiative is to develop a plan which will lead to expanded opportunities for domestic oil and gas producers. If restrictions are made on the use of land for oil and gas development in the Trap Spring area, royalty income from the production of oil will be lost by both the federal government and the State of Nevada. There will also be a significant loss of jobs that are associated with drilling and producing oil and gas. Once again, we feel that cultural and environmental considerations can coexist on federal lands without severe occupancy restrictions.

10. In 1990, Nevada voters approved a 47.2 million dollar Park and Wildlife bond issue, and as yet has seen no tangible evidence of any action. Mr. John Richardson, the administrator of the Division of State Parks, said that these projects would normally have moved more quickly, "but the administration has

been extra cautious about spending money given the economic times we are in".

11. In the fluid minerals section of the standard operating procedures of alternative number 4 (page 2-60), the following statements are made: "BLM actively encourages and facilitates the private development of public land mineral resources in a manner that satisfies national and local needs, and provide for economically and environmentally-sound exploration, extraction, and reclamation practices. Land use plans and multiple use decisions of the BLM will recognize that mineral exploration and development can occur concurrently or sequentially with relation to other resource uses". We have difficulty in understanding how such an understanding can be made in an alternative which is proposing to remove vast areas of BLM land from fluid mineral development. This statement continues to support our position that large areas in and adjacent to producing properties should not be removed from future oil and gas exploration. It is our understanding that the Trap Spring area that is being considered for limited development and no occupancy does not currently have National Register eligibility determinations. 7-9

12. Alternative 4 says that cultural properties without National Register eligibility will be treated as eligible properties until such determinations can be made. This determination is arbitrary and is in direct conflict of section 106 of the National Historic Preservation Act of 1966, as amended, and the programmatic agreement among the Nevada BLM, the Nevada Division of Historical Preservation and Archeology and the Advisory Counsel on Historic Preservation. 7-10

13. It is imperative that there be a very clear explanation of the process of introducing amendments to the Resource Management Plan. In the case of an existing BLM lease, will it be possible to have lease stipulations waved as knowledge and information increases relative to cultural resources or critical environmental concerns? 7-11

14. There are many conditions described in all of the alternatives which are left to the judgement of the BLM resource personnel. There is no provision in any of the alternatives for residents located in the areas of concern to review the BLM personnel determinations. Many of the determinations will be somewhat subjective. We feel that a panel of local residents should be empowered with the ability to vote either for or against a subjective environmental determination by BLM personnel. Since these are the residents who will be most affected by environmental interpretations, it appears to us that these residents should have some voice in determining the need for corrective measures. 7-12

A typical example is the Visual Resource Management conducted in accordance with BLM Visual Management Procedures (manual 8400). Since the overall goal of VRM is to protect or enhance the visual and natural aspect and attributes of the public lands while minimizing the impacts of authorized activities, it is our opinion that the local residents should have some say in its interpretation. The use of the Contrast Rating process is totally subjective and should not be left to the whim of resource management personnel. These decisions are strictly visual sensitivity to the affected area. A decision to relocate activity sites behind topographic features, modify access routes, or color buildings should not be left to the decision of an authorized officer. The impact of visual resources can only be experienced by people that reside in the immediate area. The economic impact to business and residents should not be left to the sole discretion of the authorized officer of the resource management group.

7-13 15. Alternative number 4 proposes under Mineral Materials (page 2-49), to close 57,065 acres to the sale of mineral materials. This area is described on maps 59 and 60, both of which are on such a small scale that you cannot actually pick out the affected areas. This would force users of gravel to seek gravel pits at a distance which would severely impact the economics of hauling. Once again, this suggested closure is a result of the observation of seasonal wild life habitat determinations. We do not feel that the minor impact of wild life habitation around these gravel pits is of significant importance to close such a large area of available gravel. This would have a serious economic burden to all future road building and road improvement in the Railroad Valley area.

Recommendations:

1. The RMP/EIS should be directed toward the efficient management of 6.1 million acres of public lands. Environmental and cultural issues should be considered after the RMP has been established.

2. Every resident in the Battle Mountain District, Tonopah Resource Area should be mailed a copy of the proposed draft of the Tonopah RMP/EIS. These are the people that must work and live in the Tonopah Resource Area and will be impacted the most from it's implementation. Too much emphasis is being given to the cultural and environmental concerns of people that will probably never even drive through the area in their entire life.

7-14 3. An Economic Impact Study should be made to determine the additional costs to taxpayers and businesses to implement the RMP. President Clinton says the agencies need to cut spending but this RMP will obviously increase the cost to government, taxpayer, and business. How much will it cost???

7-15 4. There should be a rigid time table that is associated with each of the recommended "determinations". If the RMP/EIS is approved, how can the public know whether the determinations will be implemented this year or year 20 of the plan?

5. In order for the public to respond to the RMP/EIS, the continual repetition that is prevalent in all 4 alternatives makes reviewing the "meat" of the document very laborious. Such words a "same as" or "see Alternative #1" should be used to reduce the intimidation of such a thick document.

7-16 6. In every alternative, your interim management directions for archeological districts in Northern Railroad Valley will result in restricting fluid minerals development and prohibit discretionary surface disturbing activities in the Trap Spring/Gravel Bar areas until such time as a comprehensive research protocol can be developed and implemented. We have been preparing archeological reports on all of our drill sites in the Trap Spring area for 10 years. Surely there is enough repetitive identifications of the same "cultural type of resource" to now determine if 3,480 acres should be set aside as "no surface occupancy". How many broken pieces of indian pots, broken arrowheads, or rock fire rings must be identified before someone determines that they should be ignored or put in a museum? We recommend that the existing data be compiled and reviewed before any more lands are considered for "no surface occupancy".

7-17 7. It is imperative that a process of introducing amendments to the RMP be clearly stated in the RMP/EIS. A review board composed of BLM personnel, local residents, and county supervisors be formed to review complaints and questionable determinations in the RMP/EIS when they are implemented. The total authority should not rest entirely on one "authorized BLM agent". The process would be too dictatorial.

8. Gravel pits which are nearby to construction of roads and facilities should not be removed from future use. The increased cost of gravel transportation would discourage road and building development.

9. There is mention of acquiring personal lands from the public to preserve ACEC. This smacks of "taking" by the Federal Government and should be removed from the text of the document. Lockes Ranch is privately owned by a citizen of Nevada who has made his home, raised his family, and wants to live on the Lockes Ranch property for years to come. Even though there is mention of compensation, the mere suggestion that the BLM will try to acquire his property is a mental threat and should be completely removed from the Tonopah RMP/EIS.

August 13, 1993
Page eight

We hope that you will give ample consideration to our concerns on this study and we would be pleased to discuss them with you or your staff personally at your convenience.

Yours truly,

E. C. Kozlowski
President

cc: Mr. Ted Angle
Bureau of Land Management
Tonopah Resource Area Manager

8

NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
NATIONAL PUBLIC LANDS TASK FORCE
SOUTHWEST WILDLANDS EDUCATIONAL INSTITUTE (NORA)
NORTHERN ROCKIES BLM TASK FORCE (NORA)

WINNERS
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Roger Scholl Reno, Nevada
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George Early Naperville, Illinois
Charles H. Stoddard Minong, Wisconsin
Fau. Clifford Cleveland Heights, Ohio
Harrie Allen San Diego, California

Mr. Ted Angle
Tonopah Area Manager
Tonopah Resource Area Office
U.S. Bureau of Land Management
P.O. Box 911
Building 102, Military Circle
Tonopah, Nevada 89049

August 17, 1993

Re: Draft Tonopah Resource Area Management Plan and Environmental Impact Statement

Dear Mr. Angle:

Please accept these comments for the official record of decision on the Draft Tonopah Resource Management Plan (RMP) and Environmental Impact Statement (EIS) on behalf of the Nevada Outdoor Recreation Association (NORA). On the whole, the Tonopah Resource Area has commendably defined some of the major issues needed to be considered in this RMP. Unfortunately, it contains other serious omissions and flaws which we feel constitutes both an abdication and rejection of the BLM's stewardship mandate under FLPMA, its Areas of Critical Environmental Concern (ACEC) requirements, criteria of the 1964 Wilderness Act (i.e., FLPMA Sections 202 and 602) and the Endangered Species Act.

First, lets deal with what should have been done and included; but, which apparently was deliberately and capriciously left out. In the RMP's *Preferred Alternative*, i.e., the Alternative No. 4 theme, the BLM says this alternative provides for the development of renewable and non-renewable resources while *insuring the preservation and enhancement of fragile and unique resources*. In some vital and key areas, this is simply not true. How can the Tonopah BLM Resource Area say such a thing--given the omissions and flaws demonstrable in the text?

8-1

ISSUE NO.1: We were shocked to see 14,400 acres at ***Lone Mountain*** considered only as an ACEC. Isn't it true that FLPMA guidelines prohibit consideration of an ACEC in the place of a viable defacto roadless area over 5,000 acres? Indeed, it's fine to recommend an ACEC inside of a BLM wilderness study area (WSA)--which we have done in a number of these RMP proceedings. But, isn't it true that during the initial roadless inventory of the Esmeralda BLM Resource Area, when it was under the Las Vegas BLM District, *Lone Mountain* roadless area was not even given on-the-gound scrutiny as a WSA? Isn't it true that this 26,000 acre roadless area went largely unexamined for wilderness attributes during the initial Las Vegas BLM District WSA inventory? If such work was indeed done under Section 603, then it would be sensible to ask--does the paperwork on Lone Mountain show that an on-the-gound examination was done? Under that inventory, were reasons given for excluding this roadless area from consideration as a WSA? If so, under the *Freedom of Information Act* (FOIA), this organization asks for copies of the paperwork which shows that a proper, bonafide on-the-ground examination of Lone Mountain was done. Will this be done in the final RMP?

During the 1979 initial wilderness inventory, does the record contain documentation of a FLPMA Section 603 examination of Lone Mountain? What was found concerning: 1. the true extent of approx. 26,000 acres of rugged Great Basin range rising from 5,000 feet to a 9,108 foot summit, 2. a dense, virgin pinyon, juniper and pine forest covering much of the upper elevations of the mountain massif, 3. steep and sheer incisive canyons on a Sierra-like (cont.)

IN MEMORIAM
NORA Founders
Sumner L. Evans Sparks, Nevada
George Lund Unionville, Nevada
Ernest Johnson Empire, Nevada
James G. Hulse, Sr. Pioche, Nevada
Charles H. Calvison Jefferson City, Missouri
George Kell Sparks, Nevada
Charles Ragin Reno, Nevada
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Paul M. Tilden Bethesda, Maryland
Carmichael Lowry St. Louis, Missouri
George Hudson Pullman, Washington
Gerald L. Foreman Ft. Tobacco, Maryland

escarpment facing north and northwest, 4. a field check on reports of an endemic (squirrel-like?) mammal and *six* rare and endemic flora in the roadless area: *Eastwood milkweed, squalid milkvetch, Nevada greasebrush, Lone Mountain tonestus, Candelaria blazing-star* and *sand cholla*. 5. opportunities for an extensive primitive recreational experience, 6. the existence of a defacto wild and roadless biodiversity over 5,000 acres in size, and 7. degree of naturalness and primitive (wilderness) character, 8. visual screening inside this defacto roadless area, including the mountain's side canyons (excluding *outside* sights and sounds)?

If the Tonopah BLM Resource Area could find the time to examine it for a 14,400 acre ACEC, why couldn't the BLM also do a FLPMA Section 202 finding concerning its known wilderness condition? Why doesn't the RMP/EIS analyze the findings this organization made in actual field trips with the BLM and aerial overflights with photographs of 5,000 acre-plus (actually, closer to 26,000 acres) wilderness conditions that we've persistently pointed out to your office over the past fifteen years?

8–2 ISSUE NO. 2: We have repeatedly brought the NORA "*Big Book*"--also known as the ***NORA Index and Survey***--to your office over the last thirty years. Why is this NORA project--it's work, studies, findings and discoveries--not mentioned in the RMP/EIS? Will this be done in the final EIS?

8–3 ISSUE NO. 3: Why doesn't the RMP/EIS document include a habitat analysis of the existence of Cyprinodont ("pupfish") species and subspecies *Nevadensis-nevadensis* (in addition to the *Oasis Valley speckled dace*) in the Amargosa River? Is the Tonopah BLM Resource Area aware that Death Valley National Monument biologists insist this rare and endemic desert fish exists in the Nevada portion of the Amargosa River? If so, why aren't the source waters of the Amargosa River and springs on BLM Public Lands feeding it, recommended as an ***Amargosa River ACEC*** in the final RMP/EIS?

8–4 ISSUE NO. 4: Water, whether ground or surface water, is the limiting resource of most plants, animals and certainly man's activities in the Great Basin and specifically within this RMP/EIS. All of the communities in the Tonopah BLM Resource Area are running a severe water deficit at the present time, while promoting growth in part spurred by the availability of cheap land to developers. Why hasn't the document studied the impact on land sales on *existing* residents' property values? Why isn't fair market values keyed to existing parcels up to ten acres in the towns and urban areas? Isn't it true the BLM must have county, state and town data on the impacts of septic tanks on those Public Lands earmarked for sale--which cannot be connected to existing sewage treatment facilities? What about urban expansion into wildlands, flora and fauna habitat? Shouldn't the BLM be their own subdivider in the RMP plan when it comes to determining suitability for development? For instance, shouldn't disposals and sales be only near towns with facilities. Shouldn't there be deed restrictions, including a ban against resale for ten years.

NORA protests the excessive land sale option in the Preferred Alternative. Clearly, FLPMA restrains the BLM in the permissive sale of 297,000 acres of Public Land resources to those areas where privatization would be unmanageable or otherwise does not meet the needs of the Federal land biodiversity and in which said sales are not in the best interests of the American people as a whole. It's a fact the BLM is no longer the General Land Office. The agency is expressly mandated to be a good steward of all the resources it manages. Basic to this mandate is the ***retention*** of this environmentally sensitive "*commons*" in public ownership.

8–5 ISSUE NO. 5: Why is there no ACEC protection recommended for all of ***Crescent Dunes***? This area has a pristine dune system with an endemic dune grass still undescribed. In 1977, this organization submitted to all BLM districts and BLM resource areas our report, ***Dune Areas Of The Public Lands Of The Great Basin***, written by Derham Giuliani, Lone Pine, CA, a noted expert in Great Basin invertebrates. Why is all

mention of this report omitted in the RMP/EIS? Why hasn't the RMP/EIS in addition to the endemic *Aegialia* scarab beetle, reflected the existence of the endemic new *Cardiophorus* invertebrate species in this dune system? Will this area be recommended as an ACEC and report analyzed in the final RMP/EIS?

8–6 ISSUE NO. 6: Why was no ACEC protection consideration made for *Magruder Mountain*, near Lida, in Esmeralda County? This area is also known as ***Death Valley Overlook*** and "*Big Moly*". In the 35-year-old *NORA Index & Survey*, our field investigation dating from 1960, depicts (with photographs) a lofty alpine area rising to 9,046 feet. This area contains Bryce Canyon-like spectacular "breaks" with orange, red and yellow formations. The mountain mahogany groves in the area are near-record size. In addition, this remarkable area is so unique it was once considered for a state park. Dominated by lofty Magruder Mountain, this area provides an unparalled view of the entire length of Death Valley and at the same time, the Sierra Nevada Mountains to the west. NORA has brought this area to BLM's attention for 33 years. Why wasn't this information duly recorded and acted upon in your planning? The area's location is in T. 6 S., R. 39 E., sections 27, 28, 29, 31-35 and T. 7 S., R. 39 E., all sections in Esmeralda County, Nevada to the NV-CA state line. Will this be done in the final RMP/EIS?

8–7 ISSUE NO. 7: Why wasn't ***Brickyard Canyon Petroglyphs*** examined and designated an ACEC? This is a unique set of Fremont-Anasazi canyon symbols, figures and writings in T. 2 S., R. 42 E., Section 30, MDB&M at Indian Springs, near Goldfield in Esmeralda County. Why wasn't this section thoroughly investigated as a prehistoric man cultural site? This area was investigated and photographed by Alvin McLane of Reno, NV, on September 10, 1965 and recorded in the NORA Index & Survey. Will this be done in the final RMP/EIS?

8–8 ISSUE NO. 8: Why wasn't an area north of the town of Silver Peak, known as ***The Crater And Monocline*** designated as an ACEC in order to protect outstanding volcanic formations and phenomena? On April 2, 1986, the Tonopah BLM Resource Area area manager conducted an investigation in the field with NORA and verified the existence of fresh Hawaii-type "*Aa*" and "*pahoehoe*" lava flows, lahar deposits, basalt "bombs", olivene inclusions, fresh punice and obsidian, rift zones, extinct fumaroles, a unique series of spatter cones, possible lava tubes and a caldera from recent Quaternary Epoch series of eruptions. Why weren't these findings recorded in your resource area plan? This unique volcanic phenomena is located adjacent to and east of Nevada Highway 265 and in T. 1 S., R. 39 E., all or parts of sections 4, 5, 8, 9, 10, 14, 15, 16, 21, 22, 23, 26, 27, 34 and 35, MDB&M in Esmeralda County. Will this be done in the final RMP/EIS?

8–9 ISSUE NO. 9: Why wasn't the ***Fish Lake Valley Badlands*** designated as an ACEC? This is the site of a reported occurrence of "*dawn redwood*" or meta-sequoia petrified wood in a spectacular *mailpais* setting. This area is located east of Fish Lake Valley near the outlet of Icehouse Canyon at the west base of Piper Peak WSA. Will this be done in the final RMP/EIS?

8–10 ISSUE NO. 10: Why wasn't ***Goldfield Summit Joshua Forest*** designated as an ACEC? It is an exceptional forest of *Yucca brevifola*, with virgin growths up to 30 feet tall, along the farthest north known range of the species and growing at an unusually high 6000 feet-plus elevation in Esmeralda County. The forest straddles U.S. Highway 95 just south of 6,087 foot Goldfield Summit in T. 3 S., R. 42 E., all or portions of sections 13, 14, 23, and 24, MDB&M. Will this be done in the final RMP/EIS?

8–11 ISSUE NO. 11: A total of 668 miles of utility corridors represent a major allocation of the Public Land resource in this draft RMP/EIS. Don't the resource area's two to three-mile-wide corridors seem to be a drastic and unjustified width for pipeline and utility use? Why isn't there a moratorium being made on all such utility corridors until the Congressional Office of Technical Assessment has determined what is

actually required for a modern, secure, and environmentally safe electrical transmission network by means of a NEPA cumulative EIS? Since state-of-the-art technology now permits high-power transmission over a single facility, why not reduce the standard width accordingly to less than a mile wide?

Why are the utilities allowed to quantify, on their own, the impact on the environment?--and why does the BLM accept whatever they say? Indeed, why aren't these individual lines *individually* justified? Each one of these expanded and new corridors is based on requests by the industry and its motivated by a desire to *maximize as much as possible, the number of corridors*. Ergo, isn't the BLM wrongly--and sometimes, blindly--verifying these requests without meaningful justification and verification. Ergo, isn't it true that no more expansions and new corridors should be approved without a *natrional* anaysis of the true costs, needs and impacts? Will this be done in the final RMP?

8-12 ISSUE NO. 12: Why isn't ***Moore's Station Petroglphs*** designated an ACEC? It's is one of the state's most intricate sets and panels of Frement-Anasazi heiroglyphics. We have identified the site and its "*hoodoo*" (rock pinnacle) surroundings as an outstanding scenic area. Why hasn't the Preferred Alternative been expanded to include features on the flanks of Morey Peak still under BLM administration?

8-13 While we commend your Preferred Alternative ACEC designations at *Timbered Crater, Mountain View Arrastra, Cave Man Hill, Rhyolite townsite, Railroad Valley* and *Tybo-McIntyre kilns*--the RMP/EIS is grossly inadequate and possibly even unlawful on the other exceptional sites and areas we've cited in this testimony. Don't you think, for instance, that all known ***desert tortoise*** habitat in the southern part of Tonopah (the old Esmeralda) Resource Area--given the fact it is a threatened species--should be designated an ACEC? In view of all these omissions, isn't it clear the Preferred Alternative's ACEC recommendations are seriously deficient? Isn't this especially true in excluding this Category II reptile's habitat from utility corridors and ORV use (the latter excepted on designated roads and ways)?

8-14 ISSUE NO. 13: Given the fact that much of this resource area's Great Basin landscape in the RMP/EIS is still relatively pristine--and a known deterrent to fire--shouldn't the plan restrict much more than 4,840,811 acres from unrestricted off-road-vehicle (ORV) use? Isn't it true that ORVs have been widely determined to cause serious soil erosion and fires wherever persistent, permissively allowed and omnipresent on undisturbed soil areas? If this is true, why doesn't the RMP/EIS strictly limit such use to existing roads, designated ways, trails and washes--which the Preferred Alternative advocates? Why throw open 4,840,881 acres where the land remains relatively undisturbed to ORV use that does not have such roads, trails, ways and washes?

Thank you very much for considering these comments and concerns. If you have any questions or concerns as well, please do not hesitate to call me, or, write me at the address below.

Yours very sincerely,

Charles S. Watson Jr.

Charles S. Watson, Jr.
Co-Founder and Director
NORA
P.O. Box 1245
Carson City, Nevada 89702-1245

CSW/csw

9

COMMENTS OF AL DRAYTON
RESIDENT - RAILROAD VALLEY
AT
BLM CONFERENCE ROOM
4765 VEGAS DRIVE, LAS VEGAS, NV.
8-19-93

RE: TONOPAH RESOURCE AND MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT

MY NAME IS AL DRAYTON AND I AM A RESIDENT IN RAILROAD VALLEY, NEVADA. I WORK FOR MAKOIL, INC. IN THE TRAP SPRING OILFIELD AND LIVE IN A HOME THAT I BUILT ON THE OLD LOCKES RANCH.

I HEARD ABOUT THE TONOPAH RESOURCE MANAGEMENT PLAN IN JULY OF 1993 AND BECAME SO CONCERNED THAT I HAD THE BLM SEND ME A COPY OF THE RMP/EIS. IT'S A COMPLICATED AND CONFUSING DOCUMENT TO READ, BUT AS I DIGESTED IT, I BECAME VERY CONCERNED. I IMMEDIATELY SENSED THAT I AND MANY OF MY FRIENDS THAT LIVE AND WORK IN THE TONOPAH RESOURCE AREA MUST ATTEND THE PUBLIC MEETINGS. UNLESS SOMETHING IS DONE TO AMEND THE PLAN, MANY OF US COULD LOSE OUR JOBS AND POSSIBLY EVEN OUR HOMES.

9-1 NONE OF THE ALTERNATIVES APPEAR TO CONSIDER THE JOBS OR PEACE OF MIND OF THE RESIDENTS OF RAILROAD VALLEY. ALL THE CONCERNS APPEAR TO REVOLVE AROUND THE PEOPLE THAT DRIVE THROUGH RAILROAD VALLEY AT 75 MPH ON HIGHWAY 6 AND REALLY DON'T GIVE A DAMN

ABOUT THE CULTURAL RESOURCES, EARLY MAN SITE OR SPRINGFISH. I UNDERSTAND THAT THE FEDERAL GOVERNMENT HAS PASSED A LAW TO PROTECT THESE THINGS FOR "FUTURE GENERATIONS." SO FAR, I AND MY FAMILY HAVE LIVED AND WORKED FOR 11 YEARS WITH THE CULTURAL RESOURCES, EARLY MAN SITE AND SPRINGFISH AND ALL OF US ARE GETTING ALONG FINE TOGETHER. WE KNOW THAT THE GOVERNMENT WANTS THESE THINGS PROTECTED AND WE RESPECT THAT AND HAVE BEEN ABLE TO CO-EXIST WITH NO PROBLEM.

9-2 WHY MUST THESE ISSUES REQUIRE THAT THERE BE "NO OCCUPANCY" IN THE AREAS I WORK IN OR WHY MUST THERE BE THE CONSTANT THREAT OF THE BLM TRYING TO BUY MY PROPERTY AT THE LOCKES RANCH BE HANGING OVER MY HEAD? IN ALTERNATIVE 4, AREAS OF CRITICAL ENVIRONMENTAL CONCERN, PARAGRAPH 5, YOU STATE, "ACQUIRE 480 ACRES OF PRIVATE LANDS THROUGH EXCHANGE OR PURCHASE AT LOCKES RANCH." AS I SEE IT, MY HOME AND MY RANCH ARE INSIDE THIS 480 ACRE PARCEL. I HAVE SEEN BLM PERSONNEL WALKING AROUND MY HOME AND TAKING PICTURES. HOW DO YOU THINK IT MAKES ME FEEL!!! THIS IS MY HOME AND I HAVE RAISED MY CHILDREN AND GRANDCHILDREN IN A PLACE THAT I WANT

TO LIVE. I DO NOT ACCEPT THE BOLD THREAT IN THE TONOPAH RESOURCE MANAGEMENT PLAN THAT

9-3 EVEN SUGGESTS IN WRITING THAT AN ATTEMPT BE MADE TO "ACQUIRE 480 ACRES OF PRIVATE LANDS THROUGH EXCHANGE OR PURCHASE AT LOCKES RANCH." THIS MUST BE REMOVED FROM THE RMP.

IN THE "DETERMINATION" SECTION OF ALTERNATIVE 4, FLUID MINERALS, PG. 2-48, IT IS RECOMMENDED THAT "FLUID MINERAL LEASING

9-4 BE ALLOWED ON 53,801 ACRES WITH A NO SURFACE OCCUPANCY STIPULATION. WHY WOULD ANYONE LEASE THESE LANDS IF YOU COULDN'T MOVE A DRILLING RIG ON IT AND DRILL FOR MINERALS??

I HAVE BEEN UNABLE TO FIND ANYWHERE IN THE RMP A FORMAL WAY OF APPLYING FOR AN AMENDMENT

9-5 OR REMOVAL OF A STIPULATION OR DETERMINATION. THE DETERMINATIONS ARE TOO DICTATORIAL AND OFFER NO WAY FOR RESIDENTS THAT LIVE AND WORK IN THE AREA TO OBJECT. A REVIEW COMMITTEE SHOULD HEAR OBJECTIONS, AND VOTE ON THE VALIDITY OF A RECOMMENDED CHANGE.

MY JOB, MY HOME AND MY CONSTITUTIONAL RIGHT TO ENJOY LIFE, LIBERTY AND THE PURSUIT OF

-4-

HAPPINESS HAVE ALL SUDDENLY BEEN THREATENED BY A DOCUMENT FORMULATED ON "AREAS OF CRITICAL ENVIRONMENTAL CONCERN." I'M DAMNED MAD ABOUT IT AND I'M NOT GOING TO TAKE IT!!!

AL DROYTON
HC76 BOX 9610 Tonopah NV 89049
~~SR-3, Ely, NV 89321~~
LOCKES RANCH

10

Bureau of Land Management
Tonopah Resource Area Manager
PO Box 911
Tonopah, NV 89049

August 13, 1993

Dear Del Angle,

I have recently read a copy of your proposed management plan, RMP and EIS and have great concerns for my job, my home and my family.

I am a single parent of 2 children who attend Nye County schools. I have worked 2 years for a small oil company in Railroad Valley as a field clerk/gauger. I live on property owned by the company I work for and can remain so as long as I am employed by the company. My parents and other family memebers also reside in the area working in the oil industry. I appreciate the area in which I live and work because of the open spaces, low population, solitude and vast beauty of this land. I am very fortunate to work for Nakoil, Inc. and proud to be part of the company.

I have found the company owner, Mr. Kozlowski and the field personnel to be very conscious of protecting the environment in which we work and live. We are aware of the cultural sensitive areas and do our best to operate within federal standards, not to destroy or disrupt the cultural resources.

10-1 The RMP suggests no surface occupancy of many acres, some of which are located in the North Trap Springs area where I am employed. I feel that if plan # 3 and 4 were approved, not only would my job be threatened, but my home and the well being of my family as well as other family members working in this area.

10-2 I am curious as to if a economic impact study was prepared to determine the cost of implementing the preferred plan. Not only would this alternative require additional man power, resources and funds but would reduce oil revenues and cause economic instability in our area.

My personal recommendation is to remain with the present alternative #1 as a future management plan. Cultural documented sites have been identified and avoided in the past and will continue to be avoided in the future. Alternative #1 offers the most flexibility for the future resource management by the BLM and would ensure my continued employment and financial stability for my family.

I hope you will give attention to my concerns and realize the impact the preferred plan would have on many human lifes.

Very Truly,

Jamie A. Drayton

Jamie A. Drayton
HC 34 Ranch Rd.
Duckwater, NV 89314

c: Billy R. Templeton

11

BOB MILLER
Governor

STATE OF NEVADA

PETER G. MORROS
Director

RONALD M. JAMES
State Historic Preservation Officer

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
123 W. Nye Lane, Room 208
Capitol Complex
Carson City, Nevada 89710
(702) 687-5138

August 20, 1993

Mr. Theodore Angle
Bureau of Land Management
Tonopah Resource Area
P.O. Box 911
Tonopah, NV 89049

SUBJECT: Draft Tonopah Resource Management Plan and Environmental Impact Statement (1610[TON]; NV-932.1; NV-065).

Dear Mr. Angle:

The Nevada Historic Preservation Office reviewed the subject document and finds that it adequately discusses cultural resources as required by the National Environmental Policy Act of 1969. This office supports Alternative 3, because of the extra protection afforded historic properties associated with Rhyolite.

Please contact me at 687-6362 if you have any questions concerning this correspondence.

Sincerely,

Eugene M. Hattori

Eugene M. Hattori
Archaeologist

L41

12

25 AUGUST, 1993

TO: BUREAU OF LAND MANAGEMENT
TONOPAH RESOURCE AREA MANAGER
PO BOX 911
TONOPAH, NV 89049

FROM: DARRELL R. HARTING
KLONDYKE
PO BOX 76
GOLDFIELD, NV 89013
AND 16810-12TH AV S.W.
SEATTLE WA 98166-3404
(206) 243-3566

SUBJECT: RMP COMMENTS

REF: DRAFT TONOPAH RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

THESE COMMENTS ARE IN 3 MAJOR SECTIONS, SUMMARIZED BELOW:

1) PHILOSOPHICAL BASIS

- IN A PERFECT WORLD, ALL OF THE LAWS, RULES, AND REGULATIONS NEEDED ARE THOSE IN THE TEN COMMANDMENTS AND THE GOLDEN RULE; ADDITIONAL RESTRAINTS SHOULD BE MINIMIZED.
- ALL REAL WEALTH IS CREATED BY EXTRACTING MATERIALS & ENERGY FROM THE SUN, EARTH, AIR, AND WATER, AND THROUGH AGRICULTURE. VALUE IS ADDED THROUGH PROCESSING, FABRICATION, TRANSPORTATION, AND DISTRIBUTION.

1) PHILOSOPHICAL BASIS (CONT.)

- ALL GOVERNMENTAL ACTIVITIES ARE PARASITIC BY DEFINITION.

2) CONCLUSIONS

- GOVERNMENTAL ACTIVITIES WHICH INTERFERE WITH THE PRODUCTION OF WEALTH SHOULD BE MINIMIZED.
- ALTERNATIVE 2 COMES THE CLOSEST TO THE IDEAL OF THE ALTERNATIVES PRESENTED
- THE PLAN HAS DEFECTS WHICH LIMIT ITS USEFULNESS

3) RECOMMENDATIONS

- ADOPT ALTERNATIVE 2 WITH MODIFICATIONS
- WORK WITH CITIZENS TO REMOVE OR MINIMIZE NON-PRODUCTIVE AND COUNTER-PRODUCTIVE LAWS AND REGULATIONS
- MINIMIZE RESTRAINTS UNDER EXISTING LAWS
- UPGRADE THE PLAN TO MAKE IT MORE READABLE AND USEFUL.

DETAILED COMMENTS FOLLOW:

1) PHILOSOPHICAL BASIS

- IN A PERFECT WORLD, ALL OF THE LAWS, RULES, AND REGULATIONS NEEDED ARE THOSE IN THE TEN COMMANDMENTS AND THE GOLDEN RULE; ADDITIONAL RESTRAINTS SHOULD BE MINIMIZED. IN THE EARLY DAYS, THE FEDERAL GOVERNMENT UNDERSTOOD THIS AND ACTED AS THE REPOSITORY FOR THOSE ADDITIONAL RULES MADE NECESSARY BY IMPERFECT PEOPLE, AND KEPT VALUABLE RECORDS ON THE ASSIGNMENT AND UTILIZATION OF PUBLIC LANDS.

A PHILOSOPHY WHICH CONSIDERS HUMAN BEINGS TO BE A SCOURGE OF THE EARTH TO BE ELIMINATED OR RIGIDLY CONTROLLED HAS ARISEN, USING THE "ENVIRONMENT" (AS THEY DEFINE IT) TO OPPOSE THE CREATION OF WEALTH. THIS PHILOSOPHY IS PUSHED MAINLY BY "NON-PROFIT" CORPORATIONS WITH HIGHLY-PAID ($250K RANGE) EXECUTIVES AND STAFFS. BECAUSE THEIR EXISTANCE (AND HIGH PAYCHECKS) COME FROM ALARM OVER "ENVIRONMENTAL" CRISES, THEY USE MASSIVE PROPAGANDA TO INTIMIDATE THE PUBLIC. THE "INFOTAINMENT" (SOMETIMES CALLED NEWS) MEDIA ARE MORE THAN HAPPY TO COOPERATE - SENSATIONALISM SELLS.

1) PHILOSOPHICAL BASIS (CONT.)

IF TOO MUCH PROGRESS IS MADE IN CREATING WEALTH, THE PROPAGANDA EXPERTS COME UP WITH A NEW CRITTER OR PLANT TO ADD TO THE THREATENED LIST, e.g. THE MARBLED MURELET TO STOP LOGGING WHEN IT TURNED OUT SPOTTED OWLS LIKED SECOND-GROWTH FORESTS 4 TO 5 TIMES AS WELL AS OLD GROWTH.

THE PHILOSOPHY BEHIND THESE COMMENTS IS BACK TO THE BASICS! CREATE WEALTH FOR THE BENEFIT OF MANKIND!

- ALL REAL WEALTH IS CREATED BY EXTRACTING MATERIALS & ENERGY FROM THE SUN, EARTH, AIR, & WATER, AND THROUGH AGRICULTURE. VALUE IS ADDED THROUGH PROCESSING, FABRICATION, TRANSPORTATION, AND DISTRIBUTION.

THE BASIC NEEDS FOR HUMAN EXISTENCE ARE SIMPLE - AIR, WATER, FOOD, AND SHELTER FROM THE ELEMENTS. ANYTHING ELSE IS A DESIRABLE OPTION AT BEST, OR PARASITIC REDUCTION OF ACCESS TO THE NECESSITIES AT WORST.

THE PHILOSOPHY OF THESE COMMENTS IS TO PROVIDE FOR THE MAXIMUM OF THE NECESSITIES AND OPTIONS, WITH A MINIMUM OF INTERFERENCE.

1) PHILOSOPHICAL BASIS (CONT.)

- ALL GOVERNMENTAL ACTIVITIES ARE PARASITIC BY DEFINITION.

  THIS IS TRUE BECAUSE THE GOVERNMENT PRODUCES NO WEALTH ITSELF, AND MUST TAKE ALL THAT IT USES FROM THE WEALTH PRODUCERS. IT DOES NOT MEAN THAT NO GOVERNMENTAL FUNCTIONS ARE NEEDED OR THAT GOVERNMENT EMPLOYEES ARE BAD PEOPLE. I HAVE MET SEVERAL BLM EMPLOYEES AT THE TONOPAH OFFICE - THEY HAVE BEEN COURTEOUS, KIND, HELPFUL, AND OCCASIONALLY FRUSTRATED BY ONERUS (OR WORSE, SENSELESS) REGULATIONS. THEY HAVE THE HARDEST TIME OF ALL - DEALING WITH THE PUBLIC WHERE THE METAL BITES THE DIRT,

  TO INCREASE THE PRODUCTION OF WEALTH, AND TO MAKE THE BEST USE OF THE CAPABLE EMPLOYEES AVAILABLE, THEY SHOULD BE REASSIGNED (WHEN NEEDED) TO DO THE RECORD KEEPING FUNCTIONS REQUIRED TO KEEP THINGS STRAIGHT RATHER THAN WORKING ON WEALTH-DESTROYING REGULATIONS.

  THE PHILOSOPHY IS TO MAXIMIZE THE PRODUCTION OF WEALTH BY MINIMIZING PARASITIC ACTIVITY. I ESTIMATE THE COST OF PRODUCING THE DRAFT PLAN TO BE ROUGHLY EQUIVALENT TO THE COST OF GRADING MY ROAD FOR 100 YEARS.

2) CONCLUSIONS

- GOVERNMENTAL ACTIVITIES WHICH INTERFERE WITH THE PRODUCTION OF WEALTH SHOULD BE MINIMIZED.

- ALTERNATIVE 2 COMES THE CLOSEST TO THE IDEAL OF THE ALTERNATIVES PRESENTED.

- THE PLAN HAS DEFECTS WHICH LIMIT ITS USEFULNESS.

3) RECOMMENDATIONS

- ADOPT ALTERNATIVE 2 WITH MODIFICATION
  - REMOVE ACEC'S (SUMMARY, P.6)
  - MAKE CLEAR THAT COAL MINING IS PERMITTED (1-3)
  - LOWER HERD SIZES (2-4)
  - ALLOCATE ADDITIONAL FORAGE TO LIVESTOCK ONLY, NOT TO HORSES & BURROS (2-5)
  - ELIMINATE VISUAL MANAGEMENT REQUIREMENT (2-14)
  - ELIMINATE ACEC ON LONE MOUNTAIN (2-18)
- WORK WITH CITIZENS TO REMOVE OR MINIMIZE NON-PRODUCTIVE AND COUNTER PRODUCTIVE LAWS AND REGULATIONS
  - VISUAL RESOURCE MANAGEMENT (3-3) "PLEASANT VISTAS" ARE A TOTALLY SUBJECTIVE MATTER. I LIKE TO LOOK AT MINES,

3) RECOMMENDATIONS (CONT.)

- WORK WITH CITIZENS.... (CONT.)

  RANCHES, LIVESTOCK, AND MACHINERY. PEOPLE WHO WANT TO LOCK UP THE VIEW ARE NEVER SATISFIED — VRM IS THE UNIVERSAL STOPPER OF WEALTH PRODUCTION.

- SPECIAL STATUS SPECIES (3-5)

  THE DESERT TORTISE HABITAT LOCKUP VERGES ON FRAUD. THE NUMBER OF TURTLES KILLED BY VEHICLES IS MINISCULE COMPARED TO THE NUMBER EATEN BY RAVENS! AND THE RAVENS ARE PROTECTED! CHANGE THE LAW TO ALLOW RAVEN CONTROL, AND USE OTHER INNOVATIVE APPROACHES (SEE ARTICLE, ATT.1)

- WILD HORSES & BURROS (3-9)

  THESE CRITTERS DESCENDED FROM TAME ANIMALS WHO STRAYED (THE EQUINE EQUIVALENT OF WILD DOG PACKS). IT'S SHEER MADNESS TO DEVOTE PRECIOUS FORAGE AND WATER TO THEM, NOT TO MENTION INCREASING THEIR ALLOTMENTS!

  IF SOME MUST BE KEPT, LOWER THE NUMBERS TO THOSE PRESENT IN 1940.

- CULTURAL RESOURCES (3-11)

  THE MESSAGE SEEMS TO BE, "IF ANYONE WAS HERE BEFORE, YOU CAN'T GO BACK". MOVE THE REALLY GOOD STUFF TO MUSEUMS, RECORD IT ON VIDEO TAPE, BUT DON'T STOP ALL PROGRESS! IT'S CHILLING TO THINK THAT IN A FEW YEARS MY HANDIWORK WILL BE A "CULTURAL RESOURCE"

3) RECOMMENDATIONS (CONT.)

- MINIMIZE RESTRAINTS UNDER EXISTING LAWS. CUT DOWN OR ELIMINATE COMPLETELY WITHDRAWALS OF LAND, AND ALLOW RIGHTS-OF-WAY FOR ACCESS WITH MINIMUM CONSTRAINTS. NOTE THAT ROADS ENHANCE DESERT FLORA AT THEIR EDGES IN MANY CASES, e.g. HIGHWAY 95 FROM COALDALE TO GOLDFIELD, & ESPECIALLY OLD 95 (ABANDONED) FROM TONOPAH TO THE ALKALI ROAD.

- UPGRADE THE PLAN TO MAKE IT MORE READABLE & USEFUL.

  12-1 — EDIT THOROUGHLY (SEE P. 4, SUMMARY, ALTERNATE 2, SPECIAL STATUS SPECIES, "WOULD BE ADVERSELY PROTECTED....")

  — IMPROVE COMMUNICATION WITH THE GENERAL PUBLIC. THIS SEEMS TO BE A BUREAUCRAT-TO-BUREAUCRAT DOCUMENT, INCOMPREHENSIBLE TO OTHERS WITHOUT THE GLOSSARY. MOVE THE GLOSSARY UP FRONT WHERE IT'S EASY TO FIND - FOR ME, IT WAS THE MOST-USED SECTION.

  - ELIMINATE MEANINGLESS BUZZWORDS, e.g. "FRAGILE". THERE'S NOTHING FRAGILE ABOUT THE DESERT I'M IN!

  12-2 — MAKE MAPS READABLE, & INCLUDE ALL PRIVATE LAND (MINE IS MISSING).

RESPECTFULLY SUBMITTED, [signature]

13

Comments by Richard Graeme representing Angst, Inc.

Angst is the owner of much of the fee property in the Rhyolite area and the holder of the unpatented claims that make up the 61 acres that the preferred alternative would designate as the Rhyolite ACEC. Angst is adamantly opposed to the inclusion of this area as an ACEC because of the extremely detrimental impact such an inclusion will have on Angst ability to use not only the adjacent fee land, but also the large number of other unpatented claims in the immediate area.

13-1 While the draft management plan recognizes the legal right of the claimant to persue exploration related activities and perhaps even extraction, such rigorous requirements would, by necessity, be incorporated in the required permit as to make the process impossible.

Angst has shown itself to be a good ~~stw~~ steward of the public lands and a supporter of the goals of the BLM. Recently, Angst donated a water right in the Rhyolite area to assist in the effort to protect the Amargosa toad, an action typical of this and most mining companies.

Angst, or any future owner will need to comply with the current historic preservation requirements that are part of the permitting process. These requirements are certainly adequate to protect the resource that Rhyolite represents.

I encourage the BLM to exclude the Rhyolite area from the preferred alternative or select a different alternative.

Richard Graeme
Angst, Inc.
6501 E Grant, Suite L
Tucson, AZ 85715

14

RMP Comments
Sarah A. Locke
P.O. Box 150351
East Ely, NV 89315

First I want to make it clear that my family is NOT agreeable to the exchange and/or purchase of our land at Lockes Ranch. It angers me to find that our private land is included in this draft and we were not notified. You have been working on this draft for over three years, making plans for our private land and never considered that we should be contacted? If you had it would have saved you some time and needless planning. Since you did not notify us your intentions become suspect. You will not get this land without a fight.

In reviewing your draft I find no reason to include our land or any of the private property in the area. Your impact statement states:

"Adjacent private lands contain springfish habitat and are identified for possible acquisition which would add to the habitat managed for their benefit."

What makes you think there is a need to manage this habitat? Our land has been in the family since 1883 and the springfish are still there. My family is buried there and I plan on being buried there. How does that fit into your management plan?

14-1 Highway 6 runs right through the habitat and the springfish are still there. Livestock have been grazing there for over one hundred years. Native Americans heavily used the area at some time in the past. The springfish are still there and thriving. Where is the threat? What warrants a need to manage this habitat? You claim this management will benefit the springfish. Why? How? Because you say so?

14-2 It is my understanding that these fish are only located at Lockes Ranch and Duckwater. Areas populated by man. Has it been considered that maybe mans presents benefits the habitat? Do you know that it doesn't? I believe there is no need for action.

I also believe in multiple use and that Alternative 1 best meets the concepts of multiple use. The rural communities of Nevada are economically depend on multiple use principles. There is already far too much land locked up in Wilderness Study Areas and we do not need to lock up any more in Areas of Critical Environmental Concerns'. I definitely agree with Alternative 1 that all WSAs released by Congress for multiple-uses should be open to the full array of multiple-uses.

I support Alternative 1 and want to stress again that my family's land IS NOT FOR SALE.

Sarah A. Locke

15

3800 N Bradford St.
La Verne, Ca. Sp. 275
Aug. 28, 1993 91750

To Whom It May Concern -
As an interested and concerned Friend of Rhyolite, I strongly support Alternative 3.

Sincerely,
Eleanor A. Parker

16

7041 Rogers Street
Las Vegas, NV 89118
29 August 1993

Resource Management Plan Comments
Bureau of Land Management
Tonopah Resource Area Manager
POB 911
Tonopah, NV 89049

To the Tonopah Resource Area Manager:

As a member of Friends of Rhyolite I would like to comment on Alternatives 3 and 4 of the proposed Resource Management Plan.

Alternative 3 is far preferable to Alternative 4, specifically with respect to:
- Cultural resource management
- Lands and Rights-of-Way Program
- Mineral exploration and development

Problems with Alternative 4 include:

1. The Rhyolite Area of Critical Environmental Concern would consist of only 61 acres, placing at risk structures and historic archaeological remains of great cultural significance to the California/Nevada community. The 460 acres designated by Alternative 3 are necessary to preserve the Rhyolite historic resource, which in recent years has received extensive publicity and will continue to attract even more attention from concerned citizens seeking relief from growing metropolitan population pressures.

2. Private lands adjacent to the Rhyolite ACEC would not be acquired, thereby perpetuating management problems relating to mixed ownership. Acquiring land at Rhyolite would help to consolidate management of that area.

3. Rhyolite would be available to leasing with a stipulation against surface occupancy. Although the area currently is thought to have low potential for fluid minerals, it is impossible to project with any degree of accuracy the resources that may become valuable in the future due to social and technological developments. This leaves the door open for commercial degradation of this unique part of our cultural heritage.

Due to the above drawbacks of Alternative 4, I strongly urge you to support selection of Alternative 3.

Sincerely,

H. A. Hartman

Dr. Hollister Hartman

17

GEORGE HUXTABLE
158 KELLOGG WAY
SANTA CLARA, CALIFORNIA 95051

Dear Sir/Madam:

I am writing to voice my strong support for alternative #3 in the Tonopah area Resource Management Plan for the preservation of Rhyolite. Alternative #3 affords greater protection for this town site which its needs to assure its continued survival. This town gives this and future generations a unique and invaluable perspective into an era that has past and can not be re-created if we fail to adequately preserve it.

Sincerely, George E Huxtable

18

Aug 30, 1993

RECEIVED
BUREAU LAND MGMT
SEP 1 11:12
TONOPAH RESOURCE
TONOPAH, NV

Dear Sirs:

We are writing to you in regard to the Resource Management Plan as it pertains to Rhyolite. We feel the acquiring of 61 acres of land in Alternative 4 would not be adequate to protect all the town and all the structures as they should be.

This wonderful historic site should not be wasted anymore than it has been. It should be saved for future generations.

Please go for Alternative 3.

Sincerely,

Richard Medley
Alice A. Medley
771 Buck Way
Carson City, NV 89705

19

August 26, 1993

Bureau of Land Management
Resource Management Plan
PO Box 911
Tonopah, Nevada

Area Manager

We have examined Alternatives 3 and 4 relative to the protection of the Rhyolite township and feel Alternative 3 offers greater protection, that is more credible management control for the years ahead. We are pleased that the BLM is concerned enough to protect this valuable historic and archeological site. The proposed mineral entry restrictions are especially important and represent again the type of desert management we need.

Robert M. Long

Robert M. Long
3025 Calle Noguera
Santa Barbara, CA 93105

20

RMP COMMENTS
Al Drayton - Railroad Valley Resident
at the Tonopah Convention Center
Tonopah Nevada

August 26, 1993

RE: Tonopah Resource Management Plan
and Environmental Impact Study

My name is Al Drayton. I am a resident in Railroad Valley Nevada and I also work in Railroad Valley, North Trap Springs oil field for Makoil.

I want to first comment on the RMP & EIS , the book itself obviously took alot of time, effort and money to put together, however, time and effort was not used to make it understandable. I agree witn Ted Angle that the RMP is very complicated and more than difficult to understand. In my opinion it is vague and unclear in most areas. My suggestion is to condence and simplify the RMP so a lay person can understand it. After all, the RMP does affect the working man.

My second comment is in regards to land I own at Locke Ranch, where I have built a home for my family. I plan to reside in my home at Lockes as long as I live after which my children will occupy the land.

In early 1993, I entered into an agreement with a realestate company to purchase Russell Ranch property at Locke Ranch which consists of approximately 465 acres and 5600 acres of AUM rights. I have put up earnest money to quarantee my commitment to the purchase. The AUMs would be drastically affected by the RMP in alternative 4. If this plan is approved, I don't feel I can honor my commitment to the sales agreement and therefore, forfeit my earnest money.

There is alot of attention in the RMP about the Railroad Valley Spring Fish and their habitat in the springs near Locke Ranch. I have been more than cooperative in the past 12 years allowing BLM personnel and UNR students on my property to study the spring fish. I have not allowed BLM personnel to take pictures of my home and property, but yet, they have done so without my consent. I cannot justify their reasons for taking pictures of my home unless it is part of a tactic to remove me from my property. I take it as a threat as I do the RMP in alternative #4, ACEC, paragraph 5; it states "Acquire 480 acres of private lands through exchange or purchase at Locke Ranch." My response to this believed threat is I WILL NOT SELL MY PROPERTY TO THE BLM now or in the future. In the RMP page 2-43, #4 states "Acquire private lands, if economically prudent and if the owner is agreeable through exchange or purchase at Locke Ranch (480) acres." Well, I AM NOT AGREEABLE to exchange or sell my land.

20-1

I do not understand the determination made that the spring fish is threatened. Threatened by what or whom??

I have gathered the following information from families who occupied the Locke Ranch area since 1882.

In 1883, Eugene Locke moved to this area, previously known as Kaiser Springs. He engaged in farming, ranching and raising his family.
The area known as Locke Meadows was farmed from 1882 to 1963. The fields were ditched and farmed with spring water.
A bathhouse was built over a portion of Big Spring in the early 1900's where local residents bathed daily.
In 1935, a school house was built and occupied at Locke Ranch until 1946.
A state highway maintenance station was built in 1935 and serviced a section of highway 6 until 1939.
A cafe and gas station was built in 1950 and serviced travlers and locals until 1963.
During the period of 1930 to 1946, there were approximately 27 people living in the immediate area of Locke Ranch using the springs on a regular basis as a main water source for farming, household use, bathing and many other water useages.

The history of this area is documented by the grave site and the head stones.

The Railroad Valley Spring Fish has inhabited the springs in the surrounding Locke Ranch area for many years. The fish were there in 1883 and they were there in the 1930's and 40's when so many more people lived at Locke Ranch constantly using the water and coming in contact with the fish. The fish are there today with 3 permanent residents at Locke Ranch. The fish population were doing well in the 1930's and 40's when 27 people lived in the area and they are doing well today as stated in the RMP.

My determination as a resident of Locke Ranch is that human occupancy is not a threat to the spring fish. I am fully aware of the spring fish inhabitance and see no threat to their existence.

I have worked in the North Trap Springs field for 12 years. When Makoil purchased the lease in 1983 and began further exploration, I became aware of the "cultural resources" in the area. I am personally conscious of these sites as they have been studied for atleast 12 years and pointed out to me by BLM personnel and archeologists. I have been told by BLM personnel that the artifacts are of no concern, only the story they tell is important. The RMP indicates that 12 years is not enough time to gather information. On page 3-17 #9 "Rationale: The data contained in the sites needs to be protected until such

20-2

time as professionals can study the area and collect information." After 12 years of study and observation ISN'T THERE ENOUGH DATA TO TELL "THE STORY" ?? How much more time and study is needed?? If I were to work that slow in my job, Makoil would of terminated me in my evaluation period. Why can't the current data available be compiled and "The Story" be written? Why must more time and money be spent on further study in the North Trap Springs area instead of time and money be spent on compiling and organizing the available data?

If the story would be told, then Makoil can continue with exploration and developement in the field, enhancing the local economy and lessening the dependency on foriegn oil. If the North Trap Springs area is closed for future developement, are the areas critical to environmental concern a subsitute for bread and beans??

Respectfully yours,

Al Drayton
HC 76 Box 9610
Tonopah, NV 89049

c:Pete Morros
Senator Bryan
Govenor Bob Miller
Makoil, Inc.
Nye County Commissioners

21

30 August, 1993

RMP Comments
Bureau of Land Management,
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nv. 89049

Dear Sir,

Please accept my comments in regard your proposed Tonopah Area Resource Management Plan as it affects the townsite of Rhyolite. I have received a bulletin from the Friends of Rhyolite, of which I am a member, summarizing the RMP so I am aware of some of the Plan's alternatives.

I urge you to select alternative 3 of the RMP and exercise every possible effort to save, protect and manage the townsite of Rhyolite and the surrounding area (including the Bullfrog townsite) and, when possible, aquire private property which is now within the townsite. I also urge you to work in conjunction with and support of the Friends of Rhyolite, who share my love for Rhyolite.

Rhyolite is a wondrous place rich in history, beauty and cultural value. Rhyolite stands now as a reminder of our mining heritage in the west. With your effort it will remain as such and live long into the future.

Thank you for your favorable attention to this matter.

Sincerely,

Ken Atwater

5015 Sitca Lane
Spring, Tx. 77389-3855

22

Glenn F. Adams

7217 Kennebunk Road
Baltimore, Maryland 21244-1757

August 31, 1993

Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Re: Tonopah Area Resource Management Plan

As a frequent visitor to the Tonopah area I an especially concerned that the proposed Alternative 4 plan does not do enough to protect the Rhyolite townsite. As a visitor from the Eastern United States, I can only begin to express the true joy I experienced visiting Rhyolite. It is the epitome of the "traditional" image of the Western ghost town. To stand on the deserted street in front of the decaying bank building WITH NO ONE ELSE THERE is a treasured memory.

Please consider Alternative 3 as the favored plan since it does more to protect the area around Rhyolite from private ownership and future uncomplimentary development.

I truly hope my grandchildren will get to visit an unspoiled Rhyolite.

Sincerely,

Glenn F. Adams

Glenn F. Adams

23

PAUL NELLEN * TURNERSTRASSE 9 * D-20357 HAMBURG-St. PAULI * Fx+T:040-4391215

Bureau of Landmanagement (BLM)
- RMP Comments
Tonopah Resource Area Manager
PO Box 911

Tonopah NV 89049

Hamburg, 8/30/93

Dear Sirs,

as a member of FRIENDS OF RHYOLITE, I write you regarding to the Tonopah Area Resource Management Plan which has obviously decicive impacts on Rhyolite's historical character.

I am very concerned about your intention to open vast areas of Rhyolite for private investment. Nevada has not many historic and archeological sites that show so impressive the mining base of the state's welfare. I think you have an obligation to protect Rhyolite's unfalsified character as well as to restrict all commercial activities, mining claims etc. which could disturbe and demolish the dignity of the ruins. You should show all required respect to your historical and cultural heritage. It would seem this is not shown in your planning's intentions and priorities.

I support the FRIENDS OF RHYOLITE in their efforts to stress the most extensive protection of Rhyolite's historical character. Therefore I beg you to prefer "alternative 3" of your management plan instead of "altenative 4".

Please let me know how you will decide in that issue.

With best regards -

-Paul Nellen-

24

Bureau of Land Management
Tonopah Resource Area
Tonopah, Nevada

Sept 4, 1993

Dear Sirs:

I am writing you this letter to let you know that we feel that the historic site at Rhyolite could best benefit if you would pass alternative 3 of the Resource Management Plan.

Cordially yours,

Kenneth E. Lengner
810 Creek Side Dr.
Fullerton, Calif. 92633

25

Friends of Rhyolite

PO Box 85
Amargosa Valley NV
89020

RMP Comments
Bureau of Land Management
Tonopah Resource Area Manager
PO Box 911
Tonopah, NV 89049

Sept. 3, 1993

Dear Mr. Angle,

I am writing in response to the Tonopah Resource Management Plan as it pertains to Rhyolite, Nevada. I applaud the efforts of the BLM to do more in the townsite of Rhyolite. However after looking over the plan and realizing that this is a 20 year plan, I do not feel that the preferred alternative is sufficient for the degree of public interest in the townsite or for the protection needed by that interest. For that reason I support strongly Alternative 3. My particular concerns are in the differences between Alternative 3 and 4 over the amount of land to be considered in the townsite. 60 acres does not begin to cover the area of habitation in the townsite. It was platted for over 420 acres and ruins stretch over to the Bullfrog area and down to the county road.

25-1

Rhyolite is a very special place. It can be reached by passenger car. It is on the border of an area that receives over one million visitors each year and that will expand in visitation in the next year if the Desert Protection Act passes. This will directly impact visitation to Rhyolite. There is nowhere else in Death Valley where people can find the number of ruins that they can find in Rhyolite. There is nowhere else close to Las Vegas where one can find the variation in architecture or the purity of the ghost town area. Those two factors alone will ensure a steady visitation flow into the town. In order to maintain that purity, the entire territory of Rhyolite must be taken into account for BLM protection. The Friends of Rhyolite will work diligently to acquire donations of land in this area if they become available and we can afford it. However even if we were able to get the prize jewel of all, the train depot, you couldn't acquire it under the present preferred alternative. Any serious effort in that town by BLM must take the entire area into account.

25-2

There is great interest in establishing a rails to trails bike path covering the old railroad bed. The possibility of that type of activity also needs to be addressed in the plan.

The interest in Rhyolite is not going to fade away. The interest will only grow. Proper planning for that interest today will make for a positive image of the agency and the townsite tomorrow.

Again, I thank you for the fact that this plan reflects an increased interest in the townsite. But the interest needs to be increased to endorse Alternative 3, not 4.

Yours Truly,

Kari Coughlin

Kari Coughlin
Friends of Rhyolite

26

Bureau of Land Management
Tonopah Resource Area
Tonopah, Nevada

Sept 4, 1993

Dear Sirs:
I am writing you this letter to let you know that I feel the historic site at Rhyolite could best benefit if you would pass alternative 3 of the Resource Management Plan.

Nancy C. Anderson
1617 Tennis Match Way
Encinitas CA 92024

27

Sept 2-93

R.P.M. Comments Manager
Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada, 89049

Sirs:

To whom it may concern.

On a recent bus tour to Beatty, we took a side trip to Rhyolite. Being an old love of Ghost Town, and gold mining places of the past, - I found Rhyolite to be quite interesting, and as much surrounding land and all of the old town should be preserved for posterity.

I am strongly in favor of (Alternative Three) as I have read of its meaning in a recent newsletter. Although I live in California, I feel that all these old places should be saved.

Sincerely
Sherwood R. Stahley
3829 Sywood Way
Sacramento Ca. 95864

28

Sept 4, 93

Dear Sir:
Please, please whatever you do, do not disturb Rhyolite as it is. Nevada has few historical areas. This is an important one. 3006 El Camino Ave
Sincerely Alice Turner R.D.M. 89102

29

TOIYABE EXPLORATION, INC.
14050 FOOTHILL ROAD, GOLDEN, CO 80401
(303) 278-2961

EUGENE J. MICHAL
PRESIDENT

September 1, 1993

Bureau of Land Management
P. O. Box 911
Tonopah, NV 89049

Dear Sirs:

As a descendant of Rhyolite pioneers, I am writing to urge the BLM adoption of Alternative 3 on the Tonopah area Resource Management Plan as it pertains to the historical area of Rhyolite, Nevada.

Anyone who has viewed the general area, studied its history, compared its present status with early-day photographs, and walked the off-road byways from Bullfrog to the train depot can appreciate the vast potential of this historic district.

Of course, it will require special effort to preserve the remaining historical artifacts, but the district should be preserved as a whole, as an entity, not just the bottle house and main street.

My father and mother lived in a half-tent on the lower ground east of the main street and there were hundreds of others in the same area. While almost no structures now exist there, that too is historic ground and there are very likely undiscovered artifacts which tell the story of these everyday lives.

This is the importance of acquiring the larger area proposed in alternate 3, so that a coherent picture can be created and preserved of the whole community. We, and I include both private interests and the BLM may not be able to mount an extensive program to develop the picture at this time for financial reasons, but some time in the future someone will. The least we can do is to restrict access and preserve the physical remnants so others can build on our plans. Further, as a mineral explorationist it is my opinion that restricting or eliminating mineral development in the proposed area will not produce any significant detrimental effect on the economy of Central Nevada or on our national mineral needs.

One can easily envision a modest program of pathways and street signs surveyed and laid out from Bullfrog past the Bottle House to the train station with descriptive markers pointing to and describing the significant mines, business houses, government buildings and residential areas. And ultimately a visitor center where the story of transportation, mining, water supply, climate, ecology,

FIELD OFFICE: 1417 HUMBOLDT STREET, RENO, NEVADA 89509

and the changing environmental conditions can all be drawn together in an historical whole.

Of course, you'll say, we can't afford all that. Perhaps not, not at this time, but at least lets make an effort to do the most we can to preserve the area.

Lets tie up 460 acres now, as in Alternative 3, not the 60 acres proposed in Alternative 4.

Sincerely yours,

E. J. Michal

30

Midge Ondes
251 P. Cabana
Rohnert Park, CA 94928

Sept. 5, 1993

Bureau of Land Management
Tonopah Resource Area

To Whom It May Concern:

I would like to go on record as supporting Alternative # 3, in the break down of the Tonopah Area Resource Management Plan.

I was born in the town of Rhyolite, so naturally I am very intrested in any changes that are made in the area.

30-1 In Alternative # 3 the possibility exists to acquire private lands in that area, such as the train depot and other ruins.
Without all the area the town will always be incomplete. Others could come in and set up shops.

Alternative # 3 does not effect current mining operations in Rhyolite. But it does open up the possibility for a BLM swap with the mining company for the train depot and also mining claims.

30-2 Could there be some mention in the plan for scenic by way routes in the town site?

Because of my location I will not be able to attend any of the meetings. I am most interested and I hope you will keep me informed.

Sincerely

Midge Ondes

31

9/6/93

Dear Manager:

I am writing to you about the Tonopah area Resource Management Plan as it pertains to Rhyolite, Nevada. Allow me to first explain to you that I am a member of Friends of Rhyolite and became a member because I have a special fondness for historic ghost towns. I am also a member of Friends of Bodie, CA and have made many visits to Rhyolite, Bodie and several Nevada ghost towns and near ghost towns. It is so sad to return to a place and see the vandalism and destruction that so many historic sites have endured over the years. It is also very encouraging to be a part of an organization such as Friends of Rhyolite that is dedicated to PRESERVING and protecting our history so that we may enjoy these wonderful historic towns and so may our children and all future generations. I've been a subscriber for two years now to the Pahrump Valley Times for the sole purpose of reading an occasional article and seeing an occasional photo of Rhyolite. Until recently, I was a subscriber to the Reese River Reveille so I could keep up with the news of Austin, Nevada and now even that oldest continuously published newspaper of Nevada has folded.

I want to express my utmost support of Alternative three of the Tonopah area Resource Management Plan. I believe this is the best alternati because of more land saved and protected and also leaves the possibility to acquire private land in the area including the land the Train Depot is on as well as the Bullfrog ruins.

Let me ask that common sense rein supreme as an exciting alternative to the way most private, business, or government ideas turn out. Won't you join me in saying NO to an incomplete town of Rhyolite? Won't you join me in saying NO to commercializing our history? Won't you join me in an effort to see that common sense dictates our present and future efforts to preserve our past?

Thank you for taking the time to read my letter and I hope to hear from you regarding the outcome of this matter.

Respectfully yours,

William J. Miller

William J. Miller
5120 E. 28th Street
Long Beach, CA 90815

32

STATE OF NEVADA

BOB MILLER
GOVERNOR

STATE BOARD OF AGRICULTURE
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RONALD YAMAMOTO

DEPARTMENT OF AGRICULTURE
MAILING ADDRESS—P.O. BOX 11100
RENO, NEVADA 89510-1100

THOMAS W. BALLOW, EXECUTIVE DIRECTOR
JACK N. ARMSTRONG, D.V.M., DIRECTOR
DIVISION OF ANIMAL INDUSTRY
ROBERT GRONOWSKI, DIRECTOR
DIVISION OF PLANT INDUSTRY
STEPHEN J. MAHONEY, DIRECTOR
DIVISION OF BRAND INSPECTION

350 CAPITOL HILL AVENUE
RENO, NEVADA 89502
TEL: (702) 688-1180
FAX: (702) 688-1178

September 8, 1993

RMP Comments
Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Dear Sir:

The Nevada Department of Agriculture supports Alternative 4 with one suggested amendment. There exists in the Tonopah Resource Area good agricultural land and water which would support vegetable production. Vegetable production is being crowded out of California due to urbanization and plant disease contamination. The Tonopah Resource Area has the potential to be a good replacement for the acreage being lost in California. Vegetable production would increase the revenue generated in the State of Nevada. It will also benefit the economy of the Tonopah area by providing jobs, purchase of power, fuel, equipment, and supplies.

32-1 We recommend including the 3,840 acres within the military training route immediately north of the Tonopah Test Range. This area has the most prime ground for agricultural production. The crops that would be grown would not be effected by jet noise and the fields would only contain the most field workers during planting and harvesting.

Option 4 would benefit the Nevada economy and the citizens of our State.

Sincerely,

Robert Gronowski, Director
Division of Plant Industry

RG:smw

33

GERALD A. HAUSSER
454 WORCESTER DRIVE NE.
GRAND RAPIDS MI 49503

RMP COMMENTS
BUREAU OF LAND MANAGEMENT
TONOPAH RESOURCE AREA MANAGER
PO BOX 911
TONOPAH NV 89049

Good Morning!

Comes now a letter from the great state of Michigan, regarding The Tonopah Area Resource Management Plan, soon to be discussed. Why is this guy in Michigan concerning himself about Tonopah area matters? Well, as a matter of fact, since I've retired, I spend half the year in Henderson, and have become fascinated with and supportive of the efforts ongoing to preserve the town of Rhyolite.

It is with reference to that interest that I write to urge your consideration and support of Alternative 4 of the mentioned Plan.

As I review the provisions of Alternatives 3 and 4, it appears that Alternative 4 best provides for the necessary protections and future land acquisitions that would be in the best interests of the continued and future well-being of this historic site.

Of course, each of the Alternatives represents a step forward in favor of Rhyolite. However, it appears to me that the implementation of Alternative 4 does the best job!

Thanks for your consideration.

Sincerely,

GERALD A. HAUSSER
SEPTEMBER 2, 1993

34

30 Naugler Avenue
Marlboro, MA 0175
September 7, 1993

Bureau of Land Management
Tonopah Area Manager
P.O. Box 911
Tonopah, NV 89049

Subject: RMP Comments

Dear Sir:

I marvel at the amount of effort that has gone into this comprehensive RMP. Everyone is surely to be congratulated.

It seems to me that Alternative 4 (your preferred) allows roads and exploitation by private interests to an intolerable degree. I admit that I favor:

1. Reducing grazing by cattle, sheep, et alii.
2. Emphasizing the protection and enhancement of the habitat, water, and resources for the wild horses and burros.
3. Keeping hunters and tourists out of most of this entire area. I think non-killing hikers are all right.

Of the alternatives offered, I choose Alternative 3.

Sincerely,

Dr. E.B. Robinson, Jr.

35

SAVE RHYOLITE

YES FOR ALTERNATIVE THREE

Connie L. Mailhiot
300 E Tropicana #83
Las Vegas, NV 89109

BLM
TONOPAH RESOURSE AREA
MANAGER
P.O. BOX 911
TONOPAH, NV
89049

36

HAAS AND ASSOCIATES

Wine Glass Ranch
HC 60 Box 54802
Round Mountain, NV. 89045-9801

Telephone: (702) 377-2388
Facsimile: (702) 377-1005

MR. TED ANGLE
TONOPAH RESOURCE AREA MANAGER
BUREAU OF LAND MANAGEMENT
PO BOX 911
TONOPAH, NEVADA 89049

SEPTEMBER 13, 1993

RE: THE TONOPAH RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

DEAR TED,

THE ABOVE REFERENCED PLAN WILL REMOVE ESSENTIALLY ALL OF THE LIVESTOCK FROM THE BLM LANDS IN NYE AND ESMERALDA COUNTIES IN THE FOLLOWING WAYS:

FORAGE UTILIZATION

1. THROUGH THE ESTABLISHMENT OF A MAXIMUM ALLOWABLE PERCENTAGE OF FORAGE USE IN CERTAIN "KEY" AREAS, AND
2. THROUGH THE LOCATION OF THE MONITORING SITES WITHIN THOSE CERTAIN KEY AREAS, AND
3. THROUGH THE LACK OF AVERAGING OF USE WITHIN THOSE KEY AREAS WITH THE USE IN THE ENTIRE ALLOTMENT.

IT IS COMMON KNOWLEDGE THAT LIVESTOCK WILL CONGREGATE ON OR NEAR RIPARIAN AREAS, AND WHERE THERE IS SHADE, OR WATER, OR SHELTER ON SOFT GROUND. WHEREVER CATTLE CONGREGATE, THEY WILL EAT ESSENTIALLY ALL OF THE READILY AVAILABLE FORAGE IN THE IMMEDIATE AREA BEFORE MOVING OUT. THESE AREAS CONSTITUTE LESS THAN 1% OF THE BLM LANDS IN NYE AND ESMERALDA COUNTIES.

NO COW HAS EVER BEEN TRAINED TO EAT ONLY 55% OF A CLUMP OF GRASS, AND NO MANAGEMENT PLAN HAS EVER BEEN DEVISED TO INSURE THAT THE FORAGE IN THE AREAS OF CONGREGATION WILL BE EATEN EVENLY WITH THE BALANCE OF THE OVERALL ALLOTMENT.

RESEARCH SPECIALISTS IN VESTED RIGHTS

REDUCING THE NUMBERS OF LIVESTOCK WILL NOT REDUCE THE CONSUMPTION OF FEED ON THE PREFERRED AREAS. IN OTHER WORDS, FEWER LIVESTOCK NUMBERS WILL STILL SIMPLY EAT ALL OF THE READILY AVAILABLE FORAGE FIRST. FIFTY HEAD OF CATTLE WILL IMPACT THE "KEY AREAS" EXACTLY THE SAME AS 500 HEAD OF CATTLE WILL.

THE RMP AND EIS DOES NOT ADDRESS WHERE THE LOCATION OF THE MONITORING CAGES WILL BE. IF THEY ARE PLACED NEAR A "PREFERRED AREA", THEN THE UTILIZATION WILL ALWAYS BE OVER 55%.

THE FATE OF THE LIVESTOCK OPERATOR IS TOTALLY IN THE HANDS OF THE "RANGE CONSERVATIONIST" WHO IS CONDUCTING THE STUDY. THE FOREST SERVICE HAS ALREADY USED THIS MONITORING PROCEDURE TO REMOVE LIVESTOCK FROM THE FOREST. UNLESS AVERAGING OF THE ENTIRE ALLOTMENT IS DONE, AND UNLESS THE "KEY SITES" ARE CHOSEN A REASONABLE DISTANCE FROM NATURAL CATTLE CONGREGATION AREAS, THEN THERE WILL BE NO CATTLE ON BLM LANDS IN NYE AND ESMERALDA COUNTIES IN THE FUTURE.

INCREASED WILD HORSE USE

THE RMP AND EIS GIVES NO ASSURANCE THAT EXCESS HORSES WILL BE REMOVED OR THAT INCREASED NUMBERS WILL BE CURTAILED. IN 1971, THERE WERE FORTY-TWO HEAD OF HORSES ON THE SHEEP MOUNTAIN ALLOTMENT, AND NOW THERE ARE 350 HEAD. IN 1971 THERE WERE NO HORSES IN THE LONE MOUNTAIN AREA, AND NOW THERE ARE 150 HEAD, EVEN AFTER 200 TO 300 HEAD WERE GATHERED. IN THE NORTH SMOKY ALLOTMENT THE HORSES ARE NOW CONSUMING OVER 50% OF JIM BERG'S AVAILABLE FEED.

EXCLUSION AREAS

ON PAGES 3 - 9, WE READ: "LIVESTOCK GRAZING HAS BEEN EXCLUDED FROM "CRITICAL" WINTER RANGE FOR MULE DEER ON MOREY BENCH AND TOIYABE BENCH". THE TOIYABE BENCH AREA IS ONE TO FIVE MILES WIDE AND APPROXIMATELY FIFTEEN MILES LONG. THERE ARE OVER FIFTEEN STOCKWATERS IN THIS AREA WHICH BELONG TO JIM BERG AND RO LIVESTOCK.

I WILL NOT DWELL ON THE ABSURDITY OF THIS DECISION TO EXCLUDE LIVESTOCK COMPETITION FOR FORAGE WITH MULE DEER, BUT I WILL STATE UNEQUIVOCALLY THAT THE DENIAL OF USE OF THESE STOCKWATERS IS A CLEAR VIOLATION OF THE FIFTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES. THE RMP IGNORES THE SUBJECT OF TAKING PRIVATE STOCKWATER RIGHTS.

THANK YOU,

CARL HAAS

37

RMP COMMENTS
BUERAU OF LAND MANAGEMENT
TONOPAH RESOURCE AREA MANAGER
P.O. BOX 911
TONOPAH, NV 89049

SEPT. 8, 1993

Recently my husband and I received a "Friends Of Rhyolite Special Bulletin", concerning the future of Rhyolite. After reading the provided information we feel it would be better to put in place the ALTERNATIVE 3. We realize and appreciate the help that the Bureau of Land Management has given in the past and continues to give for Rhyolite's future.

It seems that the United states is always ready to destroy its past for the future, but without your past the future can be very hazy and unappreciated. We all need to know how and what our ancestors did and endured for our future. The plans that ALTERNATIVE 3 provide are very far reaching but in the long run will be appreciated by all of us who cherish our past and can see the past with our own eyes and not just pictures in a book. We have let too much of the past in Nevada be destroyed or just left to the elements to be lost FOREVER. Nevada had and still has a strong tie with California history and it is very interesting to see how they have intertwined during the past decades and still do in the present time. We can learn much about ourselves through the past.

Thank you for reading and listening to our comments. We hope that you will take these thoughts in consideration when making any final decisions for Rhyolite. Remember once a building or monument is gone it is gone FOREVER.

FRIENDS OF RHYOLITE,

Richard L. Emblen
Betty J. Emblen

1265 PULLMAN DR.
SPARKS, NV 89434-4045

38

President
Joel Blakeslee
7455 Star Hill
Sparks, Nevada 89436
Phone: 673-0900

Sec.-Treas.
Judi Curran
4170 St. Clair Road
Fallon, Nevada 89406
Phone: 867-2239

Vice-President
Gene Gardes
2775 Lone Tree Rd.
Fallon, Nevada 89406
Phone 423-8288

Fur Manager
Jim Curran
4170 St. Clair Road
Fallon, Nevada 89406
Phone: 867-2239

NEVADA TRAPPERS ASSOCIATION

September 14, 1993

"RMP" Comments
Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Thank you for the opportunity to review and comment on Draft Tonopah Resource Management Plan and Environmental Impact Statement. Following are our comments regarding above.

The above document is generally well done and appears to provide trapping opportunities similar to what we have enjoyed in the past. There are however some areas that may be cause for concern.

First we want to point out that trapping and hunting of animals for their pelt values is a historic and traditional use of lands throughout Nevada. Modern trapping and hunting of furbearers is controlled and regulated by the Nevada Department of Wildlife.

38-1 We are unable to find trapping or hunting of furbearers mentioned in the report with the exception of some references to predator control. Also there is no indication regarding management of furbearing resources.

38-2 Areas to be disposed of are of concern to us. They may have value from the standpoint of animals themselves or may provide access to trapping areas. These values should be considered when and if areas for disposal are considered.

38-3 We note there may be some seasonal restrictions placed on use of winter deer ranges, bighorn lambing areas and sage grouse areas in late winter. The bobcat season in some years extends into the first week of March. Our experience indicates that there is no negative impact to the above animals by our presence as the visit is usually by a single trapper for a very brief period.

President
Joel Blakeslee
7455 Star Hill
Sparks, Nevada 89436
Phone 673-0900

Sec.-Treas.
Judi Curran
4170 St. Clair Road
Fallon, Nevada 89406
Phone: 867-2239

Vice-President
Gene Gardes
2775 Lone Tree Rd.
Fallon, Nevada 89406
Phone 423-8288

Fur Manager
Jim Curran
4170 St. Clair Road
Fallon, Nevada 89406
Phone 867 2239

NEVADA TRAPPERS ASSOCIATION

It is distressing to some of our trappers to find roads and trails degraded by vehicle races or events to the extent that they are very difficult to travel. Attention to this problem would be greatly appreciated.

Sincerly,

Gene Gardes for

Joel Blakeslee
President

39

A:

Dear BLM-Manager

Sep. 13, 93

I would like to urge you to adapt alternative #3 concerning Rhyolite. Rhyolite is as unique as the people of NV. I first went there in 1961 and again in 1991. The area has really deteriorated and its a shame.

Sincerely,
S. Bateman

40

Raymond Harold Kansas
P.O. Box 7203
Metairie, Louisiana 70010

Monday, September 13, 1993.

RMP Comments
U.S. Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada 89049

ATTENTION: MR. THEODORE ANGLE.

Mr. ANGLE:

My purpose in writing to you is to ask you WHY there is no mention of the fossils from the ESMERALDA Formation in the Tonopah RMP of 1993; to ask you WHY there are currently no site-specific plans in the RMP to give special management consideration to this area or any other area in which fossils are found; to ask you WHY there are other well-publicized Mid-Miocene terrestrial vertebrate and lacustrine mollusk locations described in the scientific or popular literature that you choose to ignore?

(continued next page.)

The suggestion is made to you, Mr. ANGLE, that the paleontological record, that is, "fossil locations" anywhere IN the Tonopah RMP's 6.1 million acres REQUIRE:

40-1

a.) conducting a cadastral survey to the section level;
b.) conducting detailed geologic mapping on a 7.5-Minute scale;
c.) conducting a detailed inventory of known paleofloral and paleofaunal sites;
d.) designating the fossiliferous areas, especially the ESMERALDA FORMATION, to be Research Natural Areas;
e.) designating the ESMERALDA FORMATION a National Natural Landmark;
f.) asking the U.S. Park Service to assist with the management to PROTECT A UNIQUE ASSET and (ASSETS) for United States of America TAXPAYERS — as every citizen of this country is !!!

(Continued next page.)

MR. ANGLE, I request a reply in writing from you.

Thank you for taking the time and effort to read this letter, MR. ANGLE.

Respectfully submitted,

R. H. Kanaan, CITIZEN OF the United States of America AND TAXPAYER.

41

Clinton & Ellen Boehringer
21888 Vaughn Road
Veneta, Oregon 97487

September 14 1993

Resource Management Plan Comments

Bureau of Land Management
Tonopah Resource Manager;

Dear Manager,

As Friends of Rhyolite, and a couple greatly concerned with the preservation of the town site for future generations, we urge the B. L. M. not to adopt a policy that shuts out the opportunity to acquire more of the land now privately owned, and adjacent to, or within the town site. While we are not in total agreement with either of the Resource Management plans we would strongly advise the adoption of plan #3 rather than #4, as #3 leaves the option open to acquire more of these parcels of land, by purchase, trade, or any other reasonable means, when they become available. We believe the B. L. M. should adopt a policy that gives them the option of making decisions as to the acquisition of these lands, if and when they become available.

Sincerely

Clinton Boehringer

Ellen Boehringer

42

Twin Springs Ranch
HC 76 Box 1100
Tonopah,Nevada
89049

September 19, 1993

Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada
89049

"RMP COMMENTS"

Virtually every page of the Tonopah Resource Management Plan and Environmental Impact Statement contains unrealistic, unscientific and at times ridiculous management ideas and misinformation.

The Twin Springs Ranch has operated a thriving livestock business within the Reveille Allotment for over 100 years, and at no time has this ranch ever needed the BLM to tell them how to manage the range in a stabile to improving condition which is satisfactory on a sustained yield basis.

Our main objective has always been and will continue to be to operate under good management practices as stewards of the range, This is obvious when you consider the forage that was available to the wild horse population that reached 2306 head in 1984. Had we not been good managers prior to the governments mismanagement of the wild horses feed would not have been available for over 11 years for cattle and horses. One has only to look over the fence that divides the Reveille allotment from the Nellis Bombing Range in order to observe the BLM'S management practices on their wild horse range.

Due to the lack of time allowed to assess the Tonopah Resource Management Plan and the fact that it contains an overwhelming abundance of misinformation and unrealistic management practices, we submit the following comments and reserve the right to comment later when time allows a more thorough review by us or a court of law.

Other comments will be submitted under separate cover.

1. We prefer alternative #1 (NO ACTION)

2. We were informed at the scoping meeting that this document would not contain any livestock grazing management and after reviewing the document we find this statement to be a blatant lie.

3. Memorandum (BLM MOU 1600-NEV-151) was never followed as stated on pg. 1-2 "Relationship to BLM and Other Policies, Plans and Programs". See exhibit 1.

42-1 4. pg. 1-5 This plan in not consistent with U.S. Constitution, the N.R.S.,and the Nye County Land Use Plan.

5. pg. 2-1 Not all Alternatives are legally feasible and technically possible.

6. pg. 2-16 Wild horse and burros, the statement that the BLM will appropriate water when it "becomes available" is an attempt to steal private waters of the citizens of Nevada. Only after the BLM has put these citizens out of business would the water become "available". The public water reservation is not applicable to the use of horses which are subject to the Wild Horse and Burro Act.

7. If you want public access via Byways to less frequented public lands why create " Road less" Wilderness?

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8 pg. 2-24 #6&7 Development of water should be left to the private owner of the water source and would be available to wildlife under 1981 N.R.S.. Preventative predator control is a management tool that is imperative to the livestock industry and wildlife.

9. pg. 2-25 #5&6 BLM can't acquire already appropriated water for trout. If the road crosses the stream even once a 300 ft. non-vehicle area is not possible, nor is it possible in a narrow canyon creek bed. What makes you think Moores Station is for sale?

10. pg. 2-26 #4 Eludes again to public water reserves and the BLM's appropriative water attempt when "available" leads us to believe that it is the intent of the BLM to steal the water when the livestock operator is forced out of business.

11. pg. 2-27 #3-c By eliminating grazing within a one quarter mile of said springs the BLM would be denying use of private waters.

12. pg. 2-30 ACEC eludes again to the taking of private land, water,mineral and oil rights.

13. pg. 2-33 Wilderness Study Areas that are released and managed for primitive valves does not return them to multiple use. Determination #1 contains the same non-use stipulations found in wilderness study areas.

14. pg. 2-34 &35 Implies a taking of private water rights.

15. pg. 2-39 The acquisition of non-consumptive water rights for ACECs is a water rights taking.

16. pg. 2-43 #4 The government already owns over 98% of the resource area, they don,t need any more land to take off the county tax roll. This implies a private land taking.

17. pg. 2-47 Releasing wilderness study areas into primitive valve areas is not opening them for multiple use.

42-2 18. pg. 2-54 We will not fence our privately owned and developed spring sources. Have you preformed a TIA on this plan? The Nevada Statute only requires us to water wildlife on sources developed after 1981.

19. pg. 3-7 Your plan states that Eden Creek as 5 miles of stream habitat, when in fact at one time BLM would not allocate base water because there was not enough water!

42-3 20. pg. 3-10 Wild Horse and Burro census data is inaccurate for the Reveille allotment,see exhibit. #2

21. pg. 3-28 Net ranch income is closer to $1.00 not $5.25 per AUM, This data can be found in study compiled by John Nalivka for the Twin Springs Ranch.

22. 3-29 We object to the inaccurate figures used to depict employment by major industries and income to Nye Co. i.e. Mining and Recreation.

42-4 23. Proposed range improvement projects Appendix 5. We have no idea what theses projects pertain to on the Reveille Allotment.

42-5 24. Current forage allocation. Uses inaccurate data.

42-6 25. Allotment categorization. The Reveille Allotment is not in unsatisfactory condition.

In closing we feel that the Tonopah Resource Management Plan as a whole contains numerous attempts to confiscate private property and enact more government

regulation. A quote from George F. Wills sums up our opinion "The goal is to get government to do what it does better, or less offensively, so that the public will let it do even more. But government does so much so badly because it is trying to do much to much. The federal government is doing many things that no government can or should do, or that some other level of government would do better".
Too much of our time is already spent justifying bureaucratic idiocy in order for us to provide food for the American people.

Joe B. Fallini Jr.

Joe B Fallini Jr

Susan L. Fallini

Susan L. Fallini

enc. 2

43

FALLINI AND BEN COLVIN (excerpts from original letter)

43-1 Page 1 - The Order 3 Soil Survey information for the Tonopah Resource Area is not presented in the Tonopah Draft Resource Management Plan and Environmental Impact Statement (Tonopah DRMP-EIS). An Order 3 Soil Survey is a general survey which usually classifies soils to the "soil series" level of classification. Such baseline information is necessary to evaluate land use potential, to establish the potential natural plant community (PNC) and to develop reclamation plans. Without this baseline soil information, the ecological status (range condition), land use potential and other important information cannot be determined or evaluated.

43-2 Page 1 - The areas identified as A in Watershed 18 on Map 3, which are located within the southeastern corner of the Reveille Allotment, do not exhibit accelerated erosion. The is generally steeper terrain including foothills and a mountain range. This area receives lower utilization levels than the valley bottoms. These areas have perennial grass cover. Any observed erosion is due to processes rather than man-made factors.

43-3 Page 1 - An erosion control seeding would be beneficial in the area identified as A in north end of Watershed 12 on Map 3 (Stone Cabin Allotment). Much of this area is a virtual monoculture of Big Sagebrush.

43-4 Page 1 - The area identified as B in the north end of Watershed 12 (Stone Cabin) does not exhibit accelerated erosion. Much of this area is composed of Black Sage sites which are shallow, gravelly sites with low potential. Any observed erosion is due to natural factors, such as the low potential for perennial grass cover. Seedings or other projects in this area may disturb existing vegetative cover and increase erosion.

43-5 Page 1 - The area identified as A in Watershed 12, just west of Warm Springs and north of Four-Mile Spring, exhibits little, if any, accelerated erosion. Most of this particular area does not have sufficient gradient for significant erosion. Locations within this area with little vegetative cover appear to be a result of salinity problem rather than man-related activities such as livestock grazing. Seedings in such areas will probably fail.

43-6 Page 1 and 2 - The areas identified as A and B in Watershed 12 west of Stone Cabin and Five Mile Ranch do not exhibit accelerated erosion. Perennial grasses such as Needleandthread, Indian ricegrass and Squirreltail are abundant. These areas usually receive slight (1-20%) or light (21-40%) utilization levels.

43-7 Page 2 - The area identified as B in Watershed 12 in the southwest corner of Stone Cabin Allotment between Black Butte and Reed Ranch does not exhibit accelerated erosion. The area receives slight and light use. Perennial grasses such as Indian Ricegrass are abundant. The impacts of man-related activities are minimal.

43-8 Page 3 - The current vegetal conditions in the affected environment should be described in terms of seral stages of ecological status and current trend (direction of change) in said status. Descriptions of current vegetal conditions should be made for each major vegetation type in the resource area as well as on an allotment by allotment basis.

43-9 Page 3 - The Tonopah Draft Environmental Impact Statement (DEIS) states on page 3-2 that Salt Desert Shrub range sites are fair to poor range for big game species. This is contrary to the habitat conditions reported for big game species under the heading of "Wildlife Habitat" on page 3-3 of the Tonopah DRMP-EIS (see below).

43-10 Page 3 - The Tonopah DRMP-EIS fails to describe the current Visual Resource Management (VRM) situation in the resource area, or to provide a map showing the location of the current VRM class boundaries. The Visual Resource Map of the 1981 Tonopah Grazing EIS (attached as Exhibit 1) needs to be added to the Tonopah DRMP-EIS to show the current VRM situation that exists in Northern Nye county. In addition, a map depicting the situation that exists in Esmeralda and Southern Nye counties also needs to be included in the Tonopah DRMP-EIS.

43-11 Page 4 - There is no standard cited in the Tonopah DRMP-EIS for these determinations but it is assumed the BLM Manual Transmittal Sheet 6630- Big Game Studies (Release # 6-41) was implemented to formulate these conclusions (attached as Exhibit 3). The Tonopah DRMP-EIS should confirm such assumption. In addition, it is important to note that, for pronghorn antelope, the aforementioned document only ranks pronghorn antelope habitat into the following 3 categories: poor, fair, and good.

43-12 Page 4 - Based on the habitat conditions reported for mule deer in the Tonopah DRMP-EIS (see above), it is contradictory to report on page 3-3 of that same document that mule deer habitat in the southern two-thirds of the resource area is considered marginal. In addition, it is also incorrect to report on pages 3-3 and 3-4 of the AFFECTED ENVIRONMENT section that "heavy use of important browse species by livestock have contributed to deterioration of some winter range." Livestock grazing

is currently prohibited on the Toiyabe Bench (8127 acres) and the Morey Bench (1000 acres), which, according to the Tonopah DRMP-EIS, are where the largest concentrations of mule deer presently congregate on winter range.

43-13 Page 5 - The Tonopah DRMP-EIS reports on page 3-4 that there is "potential habitat" for the threatened plant, the spring-loving centaury (Centaurium namophilum), which "appears to require the springs and riparian areas of the Amargosa River drainage." However, the Code of Federal Regulations (50 CFR Ch.1, 17.96 [a], 10-1-92 Edition, pp. 243-244) designates the critical habitat for the spring-loving centuary and such designation does not include the Amargosa River drainage (see attached Exhibit 4).

43-14 Page 5 - Map 19 referenced on page 3-5 of the Tonopah DRMP-EIS reports that the USFWS has classified 70,600 acres at the south end of the resource area as Non-Intensive Category III desert tortoise habitat. This representation of desert tortoise habitat is incorrect for two reasons.

1. The Code of Federal Regulations (50 CFR Ch.1, 17.95[c], 10-1-92 Edition, p. 208) designates no critical habitat for the desert tortoise in Nevada (see attached exhibit 5).

2. An undated "Full Force and Effect Decision" (cover attached as Exhibit 6) imposed on Colvin Cattle Company, Inc., by BLM (GR No. 6123), indicates that the Non-Intensive Category III desert tortoise habitat on the Montezuma Allotment is smaller than the area reported on Map 19 of the Tonopah DRMP-EIS.

Finally, the Tonopah DRMP-EIS states that desert tortoise habitat in indirectly impacted by loss of cover, change in vegetation, and compaction of soils in areas where livestock concentrate. This statement is misleading because the Tonopah DRMP-EIS offers no evidence to support that livestock or any other herbivore impact tortoises in this planning area. In addition, little if any livestock use occurs in the tortoise area within this planning area, so any impact to tortoises within this planning area is unrelated to livestock grazing.

43-15 Pages 5 and 6 - Maps 18 and 19 referenced on page 3-5 of the Tonopah DRMP-EIS list category II(C2) plants and animals that occur throughout the resource area. However, the legends of these maps combine both plants and animals in their representation of C2 species. Therefore, it is impossible to tell which C2 species (plant or animal) occur within the Reveille and Stone Cabin allotments as they are presented in the Tonopah DRMP-EIS. In addition, there is no mention of C2 species (plant or animal) occurring within the Reveille or Stone Cabin allotments in previous documents that are referenced by the Tonopah DRMP-EIS. No C2 species were reported by the Tonopah DRMP-EIS, or by previous documents cited in the Tonopah DRMP-EIS, to reside within the Wagon Johnnie allotment.

The following C2 plant species were reported to reside on the Montezuma allotment in a draft allotment evaluation (AE) conducted by BLM on August 8, 1993: black wooly-pod (Astragalus funerus), spring parsley (Cymopterus ripleyi var. sanuculoides), dune penstemon (Penstemon arenarius), and P. pahutensis. In addition to the desert tortoise, which is listed as a threatened species, the following C2 animal species were reported to reside on the Montezuma allotment according to the August 8, 1993, draft AE: Amargosa toad (Bufo nelsoni), Oasis Valley speckled dace (Rhinichthys osculus ssp., and the ferruginous hawk (Buteo regalis).

43-16 Page 6 - Much of the area that is listed in Table 3C and identified with a "1" on Map 18 within the Reveille, Stone Cabin and Wagon Johnnie Allotments is inappropriately identified as riparian habitat. A riparian area is defined in the Glossary of the Tonopah DRMP-EIS on page Glossary-10 as follows:

> "An area of land directly influenced by permanent water. ... Excluded are such areas as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil."

Clear Creek (Wagon Johnnie Allotment) and Breen Creek (Stone Cabin Allotment) are ephemeral streams. Approximately 80% of the 4 miles of Eden Creek (Reveille Allotment) identified in the Tonopah DRMP-EIS is ephemeral. Breen Creek, Clear Creek and approximately 80% of Eden Creek do not contain riparian areas because the streams are ephemeral and dry up during the summer.

The portion of Clear Creek within the BLM administered lands does not support Brook and Rainbow Trout. Clear Creek was completely dry (within BLM lands) during 1991 and 1992. Clear Creek may contain brook trout and rainbow trout within Forest Service Administered lands. However, there are no fisheries within BLM lands in Wagon Johnnie Allotment.

43-17 Pages 9 and 10 - The description of primitive setting in Appendix 12 is different than the definition of primitive area listed below. The descriptions listed in Appendix

12 for the recreation opportunity spectrum settings are not found in the regulations.

Primitive area is defined in 43 CFR 8352.0-5(b) as follows:

> "Primitive area means an area that is composed of natural, undeveloped lands that are essentially unaffected by civilization and located where the natural environment can be preserved by management of recreation activities and exclusion of additional roads and commercial developments."

The identification of Semi-Primitive Non-Motorized and Semi-Primitive Motorized settings on Maps 43 and 44, for the following 6 areas (Palisade Mesa, east of Charlie's Well, Reveille, Kawich, Rawhide and Stonewall) are not reflective of the descriptions in Appendix 12.

43-18 Page 13 - Forage production potential (11bs/acre in PNC) rather than ecological status is responsible for the lack of fire in the Tonopah Resource Area. Average annual precipitation in much of the resource area is 4 to 5 inches. With so little precipitation, the potential vegetative production does not result in sufficient fuel loading and continuity for fires.

43-19 Page 13 - Private lands within Nye County are significantly less than 26% implied on the bottom of page 3-27. Only 5.4% of Nye County is privately owned (reported to us by the Nye County Assessors office).

43-20 Pages 13 and 14 - The market value of grazing permits is a result of factors such as the permittee's investment of range improvements, water rights, historical use and private land dependency. The cost for grazing on public land far exceeds the private lease rates. See Exhibit 10 - Intermountain Resource Economics Report entitled "Rangeland Reform 94: A Policy Designed to Insure the Demise of the Western Range Livestock Industry" written by John S. Nalivak dated September 1, 1993. The estimated net income for ranches in the area is less than $5.25 per AUM.

The estimated recreation days in the Tonopah Resource Area of 99340 is overstated. Many of the activities such as rock hounding, exploring and photography occur during the same outing. Therefore one person going out on public lands in their 4-wheel drive for one day could have 4 user days of recreation if they took a picture, picked up a rock and went to an area they never had been before (Off-Highway Vehicle, Photography, Exploring and Rock Hounding). In addition, people who respond to such surveys are interested in the subject and their participation would be correspondingly higher than average. Therefore, the survey respondents will have higher public land recreation participation than the average of the county citizens. To the extent that survey responses have been used as a basis or multiplier for projecting total user days, then recreation days have been significantly overstated.

43-21 Page 15 - The introduction of bighorn sheep is proposed in the following habitat areas: Hot Creek, Goldfield, Amargosa, Montezuma, Silver Peak, Sawtooth, Bare Mountain, and Gold Mountain (see Maps 14 and 17). The Tonopah DRMP-EIS is confusing and misleading here because while the Goldfield habitat area is referred to in the text as being a proposed bighorn introduction site (pg. 2-2), it is not identified as such on Map 17. Conversely, the Stonewall and Lone Mountain habitat areas are not referred to in the text as being proposed bighorn introduction sites (pg. 2-2), but are identified as such on Map 17.

43-22 Page 16 - 2. Appendices 6 and 7 in the Tonopah DRMP-EIS need to show both livestock forage allocations from applicable land use plan documents, and initial stocking levels that are consistent with current active preferences. A column showing livestock forage allocations from applicable land use plan documents needs to be added to Appendices 6 and 7. Initial stocking levels reported in Appendices 6 and 7 need to be changed to be consistent with current active preference. The additions and changes needed for the Reveille, Stone Cabin, Wagon Johnnie, and Montezuma allotments are summarized below.

Livestock Allotment	Forage Allocation[1]	Initial Livestock Stocking Level[2]
Reveille	25,730	25,730
Stone Cabin[3]	15,572	13,963
Wagon Johnnie[3]	1,219	1,219
Montezuma	10,900	10,668

43-23 Page 16 - The Tonopah DRMP-EIS indicates that future stocking levels within each allotment will be based on short-term and long-term monitoring data, but fails to define short-term and long-term. Short-term monitoring should be defined as monitoring over a period of at least 5 years. Long-term monitoring should be defined as monitoring over a period of 10 or more years.

43-24 Page 17 - 6. Range improvement projects for Northern Nye county were proposed in the Tonopah Grazing EIS of 1981, not in the Tonopah MFP as is stated in the Tonopah DRMP-EIS. Furthermore, many of the proposed projects listed

in Appendix 5 of the Tonopah DRMP-EIS were amended though Experimental Stewardship Plans and Rangeland Program Summaries. Appendix 5 needs to be rewritten to reflect such amendments.

43-25 Page 17 - 1. The Reveille, Stone Cabin, Little Fishlake, Bullfrog, Goldfield, Lone Mountain/Paymaster, Montezuma and Stonewall Herd Management Areas (HMAs) listed on Maps 22 and 23 of the Tonopah DRMP-EIS are not the 1971 wild horse and burro herd areas. The HMAs presented on Maps 22 and 23 are much larger than the 1971 herd areas. The 1971 herd areas for the Reveille, Stone Cabin, and Wagon Johnnie allotments are attached as Exhibits 7, 8, and 9. The 1971 herd areas for the Montezuma Allotment were established in the Esmeralda Management Framework Plan dated July 30, 1976. The Esmeralda Management Framework Plan established only the Goldfield and Crater Flat Burro Area (Bullfrog) as HMA's in the Montezuma Allotment, and prohibited the creation of additional HMA's within the planning unit. The Lone Mountain/Paymaster HMA consisted of private horses which remained in Paymaster Canyon in 1971. These horses did not use any of the Montezuma Allotment in 1971.

2. The initial herd sized given in Table 2-A for Bullfrog, Goldfield, Lone Mountain/Paymaster, Montezuma and Stonewall HMAs reflect the forage allocations from the November 1984 Esmeralda-Southern Nye RMP-EIS. However, such Table 2-A values may not represent populations that will result in a thriving ecological balance.

43-26 Page 19 - 1. Forage allocations rather than initial stocking levels were established for livestock and wild horses/burros in the Tonopah MFP and the Esmeralda-Southern Nye RMP. Such forage allocations are listed in the tables above and must not be used in this Tonopah DRMP-EIS as initial stocking levels. The forage allocations are not valid existing management for this Tonopah DRMP-EIS. Livestock forage allocations have been modified by monitoring and BLM decisions. Active preference is the valid existing management for livestock. The thriving natural ecological balance number is the valid existing management for wild horses and burros.

43-27 Page 28 - 5. The first sentence in the Tonopah DRMP-EIS for this section on page 2-5 is wrong and contrary to the law. The incorrect sentence is given below:

"When monitoring data show that grazing use is causing an unacceptable level or pattern of use, or exceeds the carrying capacity, such use will be reduced."

This sentence (above) is inconsistent with 43 CFR 4110.3-2(b).

The following words in this section on page 2-5 are contrary to the rest of the determinations and should be stricken.

"..., or as adjusted through the monitoring, evaluation and adjustment process."

43-28 Page 29 - Apparently this section, relates to the discussion of accelerated erosion in the Soils section of the Affected Environment on page 3-1. Accelerated erosion is defined as an increase in soil erosion associated with human activities relative to changes in vegetation cover and/or the physical properties of the soil [pp. 153 in Grazing Management An Ecological Perspective, R.K. Heitschmidt and J.W. Stuth (Eds.) Timber Press, Portland, OR]. Maps 3 and 4 identify portions of certain watersheds that BLM has stated exhibit accelerated erosion. The area identified as A on Map 3 within Reveille Allotment does not exhibit accelerated erosion. Most areas selected for erosion control projects in Stone Cabin Allotments do not exhibit accelerated erosion. Only the seeding on Willow Creek on the northern end of the Stone Cabin Allotment and on the DLE lands south Five Mile Ranch have merit.

43-29 Page 29 - The objective stated in the Tonopah DRMP-EIS is "To maintain or improve the condition of the vegetative resource". The Tonopah DRMP-EIS fails to define "condition". Condition of the vegetation in the resource area should be evaluated in terms of seral stages of ecological status. Ecological status is an ecological rating which compares the existing vegetation on a site to the Potential Natural Community (Nevada Range Studies Task Group. 1984. Nevada rangeland monitoring handbook, pp. 6). Ecological status is the most objective rating of vegetal condition that is currently available in the science of resource management. Ecological status should be the standard upon which resource condition evaluations are based.

43-30 Page 30 - The objective stated in the Tonopah DRMP-EIS is "To designate VRM classes and to manage to maintain existing scenic qualities". Such designations have already been made for Northern Nye county in the Tonopah Grazing EIS of 1981. VRM designations were not identified as an issue during the scoping process or in the section on pages 1-2 and 1-3 of the Tonopah DRMP-EIS, Step 1: Planning Process Overview, Identification of issues.

43-31 Page 31 - Determination #6 on page 2-30 states, "maintain antelope habitat in good or better condition..." This, again, is an unachievable goal for the reasons stated above. But beyond those reasons, the goal to "maintain antelope habitat in good <u>or better</u> condition..." is obviously unattainable because BLM Manual Transmittal Sheet 6630 - Big Game Studies (Release # NV 6-41) only ranks pronghorn antelope habitat into the following 3 categories: poor, fair, and good (see attached). The question becomes then, how can one achieve habitat conditions that are above and beyond what the technique is capable of producing?

43-32 Page 32 - This objective is not valid. It is not based on anything. There is no baseline information for "proper functioning condition." The definition for proper functioning condition on Glossary-10 is based on changes in attributes rather than specific attribute levels. It is impossible to change an attribute forever. The glossary definition is meaningless. The words reduced, improved, increased, productive and diverse in the Glossary definition of "proper functioning condition" do not provide the information necessary to establish what proper functioning condition is. As an example, from what erosion level to what different level does the term "reduce erosion" refer.

43-33 Page 32 - 1. Most of the streams identified on Map 18 and in Table 3-C for Reveille, Stone Cabin and Wagon Johnnie Allotments are not perennial and are not riparian areas based on the definition in the Glossary.

Clear Creek (Wagon Johnnie Allotment) and Breen Creek (Stone Cabin Allotment) are ephemeral streams. Approximately 80% of the 5 miles of Eden Creek (Reveille Allotment) identified in the Tonopah DRMP-EIS is ephemeral. Breen Creek, Clear Creek and approximately 80% of Eden Creek do not contain riparian areas because the streams are ephemeral because they dry up during the summer.

43-34 Page 33 - The streambank cover and stability ratings are subjective ratings based on a Nevada State BLM Manual Supplement NSO 6-38 dated January 25, 1978. These specific monitoring techniques are outdated and are not used in the natural resource science or profession.

43-35 Page 33 - 5. Clear Creek (Wagon Johnnie Allotment) is ephemeral within BLM lands. It does not contain any trout habitat. Any trout that may be found in Clear Creek are located in Forest Service administered lands. Acquiring minimum water flows for Clear Creek is not appropriate since the scream naturally dries up on BLM lands during most summers.

43-36 Page 34 - 1. The range condition classifications in Appendix 8 are undefined and are not appropriate. Appendix 8 includes classifications of range condition for allotments as satisfactory, unsatisfactory or undefined. There is no definition of range condition within the Tonopah DRMP-EIS. We assume range condition in Table 8 means ecological status. There is also no definition in the Tonopah DRMP-EIS for satisfactory or unsatisfactory range condition. There is no baseline ecological status information within the Tonopah DRMP-EIS to evaluate the classifications of range condition in Appendix 8.

The unsatisfactory range condition classifications in Table 8 for Reveille, Stone Cabin and Wagon Johnnie Allotments are not appropriate. Montezuma Allotment range condition was not defined. Ecological status data for Reveille and Stone Cabin Allotments were available from BLM allotment evaluations. Such data indicated that the majority of these allotments were in the late seral or Potential Natural Community (PNC) stages. This corresponds to good and excellent range condition using Soil Conservation Service (SCS) terminology. Five percent or less of these allotments were reported to be in the early seral stage, which is equivalent to poor range condition. The percentages for each seral stage are given below:

Seral Stage	Reveille	Stone Cabin
PNC	2%	2%
Late	59%	49%
Mid	27%	38%
Early	1%	5%
Unclassified	11%	6%

43-37 Page 35 - Table 8 also inappropriately rates management of allotments as satisfactory or unsatisfactory. The Tonopah DRMP-EIS does not define satisfactory or unsatisfactory management. Therefore, such classifications in Table 8 have no meaning and should be stricken. BLM monitoring studies have shown that trends in Reveille, Stone Cabin and Wagon Johnnie allotments are stable to improving[10].

43-38 Page 36 - Since livestock grazing was not a scoping issue, the allotments should not have been reclassified into new management categories by the subject process.

43-39 Page 36 - 2. The draft RMP states that livestock use will be excluded from Clear Creek. The portion of Clear Creek that is managed by the BLM is ephemeral and does not exhibit characteristics that qualify it as a riparian area. Clear Creek should not be managed as a riparian

area and therefore does not need to be fenced.

43-40 Page 37 - The Tonopah DRMP-EIS determinations, through OHV restrictions and ROS designations, effectively creates wilderness status within WSA's prior to release by congress and creates wilderness status in areas that were not previously identified as having wilderness attributes for the purposes of wilderness study. Such determinations conflict with the stated objectives.

43-41 Page 38 - 1. Determinations in the Tonopah DRMP-EIS designate Primitive and Semi-primitive Non-motorized areas within WSA's and in areas that are not currently WSA's. These designations effectively create wilderness status within WSA's prior to release by Congress and create wilderness status in areas that were not previously identified as having wilderness attributes for the purposes of wilderness study. Such determinations conflict with the stated objective.

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Sept, 16, 1993

Dear Sirs,

I am writing in regard to your plans for the Rhyolite area. We hope you will choose Alternative #3, we are sure that this has the most benefit both for the area & also for the most people.

I suppose we are especially interested because we have several relatives born & also died there - my father Edward B. Kirchen, was born there on June 13, 1911, also some of his cousins.

We are Nevada natives as well as being very interested in the preservation of our state & its history - this being an excellent opportunity to preserve a very special & fairly well preserved part of the past.

Just as a matter of record - my father (Edward B. Kirchen) had 2 daughters & the two of us have 11 children & 22 grand children, all of whom live in Nevada.

We would hope that our concerns affect your opinions & votes on this matter -

Thank you

Ellis & Lynn Vance
PO Box 20606
Sparks, Nv.
89433

45

September 20, 1993

Ted Angle,
Tonopah Area Resource Manager
Bureau of Land Management
P.O. Box 911
Tonopah,
Nevada 89049

RE: RMP Comments
Montezuma Allotment

Dear Ted:

As you know I have the Montezuma Allotment and my concern is with the numbers in the HMA and the area encompassed in the HMA.

In 1968, 1969, 1970, and 1971 there were no burros at Gold Bar (Mud) Spring and only on rare occasion would a horse wander overfrom the Death Valley National Monument to water at Gold Bar (Mud) Spring.

The big increase in burro numbers came after Highway 95 was fenced and the Monument was fenced.

This was also the case in the Goldfield HMA after the BLM constructed the fence between the BLM and bombing range, a large number of horses that had sometimes watered on the west side of that new fence broke through that fence and have reamined there to this date.

45-1 The numbers given for horses (13) on Stonewall is acceptable to me but not the number of burros, in 1968, 1969, 1970, and 1971 there were no burros in Stonewall or Ralston Well.

45-2 The HMA at Beatty should not extend any further west than the top of the Bullfrog Hills. All the burros in the Beatty area were up and down the Oasis Valley.

45-3 The Goldfield HMA should use the map of 1984 because it does not include as much of the private land east of Goldfield as the 1975 map does.

continued

page 2

45-4 The Lone Mountain Paymaster HMA should not take in any of the Montezuma allotment, in fact, there should not be a Lone Mountain Paymaster HMA.

In 1971 all of those horses on Lone Mountain in Paymaster Canyon were domestic. The rancher that had that allotment had a permit for horses. He never even allowed them in the Springdale canyon area of the Alkali flat.

I believe there should be mention of Red Brome grass in the Gold Bar (Mud) Spring area and also there is cheat or needle grass there. I realize these are annuals but those two grasses produce a big majority of the feed in the late winter and all spring.

Thank you for your attention to my concerns and comments.

Sincerely,

Ben Colvin

Ben Colvin
Colvin Cattle Co., Inc.
P.O. Box 463
Goldfield,
Nevada 89013

BC/jmc

46

Sept 20 -
St Joseph Mo
Home of Pony Express
and 150th Anniversary

ATTN: RMP Comments
Area Resource Mgr.
PO Box 911
Tonopah, NV. 89049-0911

Dear Resource Manager:-

In studying the alternatives for the proposed Resource Management Plan I find the only acceptable alternative for the Rhyolite area is Alternativ 3

I wonder what the consequences would be for the future if the BLM did NOT save the 460 acres which encompassed the town. Have any studies been done on this? It seems to me that it is too risky to leave this domain outside of the perimeter of protection.

I have been a visitor to Rhyolite (even meetings + festivals) and I know that 60 acres are not the sum total of the townsite. The town was platted with over 420 acres and you can see the ruins scattered everywhere out there

My belief - we should and must look to the future and realize this is a significant area - If not saved in its entirety now the opportunity may not come later - Please consider changing your mind on the Rhyolite issue to Alternative 3.

Rhyolite is historical, unique and a real tourist attraction, truly worth protecting for the future

Respectfully
Hubert J. Leven

HUBERT J. LEVEN
2608 SACRAMENTO ST.
SAINT JOSEPH, MO. 64507-1441

47

MRRC

Mining Remedial Recovery Company

September 21, 1993

RMP Comments
Bureau of Land Management
Tonopah Resource Area Manager
P. O. Box 911
Tonopah, Nevada 89049

Re: Comments by Angst, Inc. on the Tonopah Resource Management Plan and Environmental Statement

Dear Sir/Madam:

The following should be considered as additional comments by Angst, Inc. to those given at the public meeting in Tonopah, August 26, 1993.

Angst, Inc. strongly urges that Alternative 1, the no action alternative, be selected for future management of the Tonopah Resource area. Angst is of the opinion that the BLM has successfully managed its responsibility very well under the existing plan.

The preferred alternative, number 4, does not, as stated in the draft plan, "provide for the development of renewable and non-renewable resources." Indeed, Alternative #4 would impose so many additional restrictions on land use as to make mining virtually impossible in the case of the Rhyolite area.

Angst is the holder of a number of unpatented claims in the Rhyolite area including the 61 acres that Alternative 4 would designate as an ACEC. Angst is also the owner of substantial fee holdings contiguous to the proposed 61 acre ACEC.

47-1 The designation of an ACEC literally in the middle of this large, expensive land position in a highly mineralized area would essentially preclude the intended and highest use of this property-mining. This, would of course, significantly if not completely, eliminate any value the land may have as a mining property.

Even though the BLM acknowledge in the draft plan that the proposed ACEC site at Rhyolite is covered with unpatented mining claims (3-17) and that the claimant has legal right to explore, develop and mine; the use of the surface would be controlled in such a way as to make mining unacceptable. This would effectively negate the value of this property as a potential mineral producer.

47-2 It is fallacious to state, as the draft plan does, that no significant negative economic impact will result from these proposed changes. The inability of the claim holder to use a strategically important property such as the proposed ACEC area could easily preclude the development of a mine. This would certainly have a negative economic impact.

6301 East Grant Rd., Suite L • Tucson, Arizona 85715 Telephone (602) 722-8995 • FAX (602) 296-7378

Also, it is equally foolish to believe that the additional cost for the measures proposed throughout Alternative 4 will not "influence a decision to explore for or develop minerals" (4-91). The additional costs are not truly incremental as stated, but rather they are accumulative to those ahead borne by an excessively regulated, highly risky industry.

A lack of evidence is, said by the plan, (4-91) to be available to indicate that these types of additional costs discourage exploration. They do discourage in a way only those who will not see can ignore. Mining, the industry that has long looked to Nevada as one of the better places to do business now looks elsewhere, due in no small part, to the ever increasing burden of just such additional costs.

As a consultant to the mining industry, I am constantly asked by my clients to help them find projects not only outside of Nevada, but outside of the U.S. This trend is indeed an adverse economic impact. The implementation of Alternative 4 could only serve to further this exodus. For your information, I have enclosed a copy of a June 18, 1993 article from the Wall Street Journal that covers the exodus quite nicely.

Sincerely,

R. W. Graeme

R. W. Graeme
President

RWG/gg

48

P.O. Box 6772
San Diego, CA 92166
Sept. 19, 1993

RMP Comments
Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

First, I want to indicate my support of Alternative 3, rather than Alternative 4, for your Resource Management Plan (RMP). I am vitally interested in the preservation of Rhyolite as an historically significant and unique resource in the western U.S. Please proceed with alternative 3 so that Rhyolite will gain maximum protection under BLM over the coming decades.

48-1 Second, as you may be aware, I have authored a proposal for a rail-trail project between Beatty and Rhyolite on the old Las Vegas & Tonopah railbed. My proposal includes a plan for the restoration and adaptive reuse of the LV&T depot in Rhyolite. I have spoken to a number of people about this idea, including two of your staff members: Pat Hicks and Tracey Pharo. Attached to this letter is my original concept paper with additional meeting notes from recent discussions with BLM and other personnel.

So, in addition to recommending Alternative 3, please also include in the RMP, regardless of which alternative is recommended for Rhyolite, a provision for an interpretive rail-trail between Beatty and Rhyolite. In fact, Ms. Pharo suggested we think bigger: a rail-trail from Rhyolite to Goldfield on the LV&T right-of-way! In general, please include some words about possible adaptation of abandoned railbeds for hiking and biking trails.

Please feel free to contact me at the above address or at (619) 582-1422 if you wish to discuss any specifics. Thank you.

Yours truly,

Jim Price

Cc:
Friends of Rhyolite (K. Coughlin)
BLM, Tonopah (P. Hicks, T. Pharo)

49

PETER G. MORROS
Director
Department of Conservation and Natural Resources

PAMELA B. WILCOX
Administrator

BOB MILLER
Governor

State Land Office
State Land Use Planning Agency
Address Reply to
Division of State Lands
Capitol Complex
Carson City, Nevada 89710
(702) 687-4363

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

September 24, 1993

Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada 89049

Dear Sir:

We have reviewed the draft Tonopah Resource Management Plan and Environmental Impact Statement and have focused that review on Alternative 4, the preferred alternative. The preferred alternative appears to be, for the most part, a reasonable approach to the management of lands in the Tonopah Resource Area for the items concerning this agency. Other state agencies will comment on their own particular areas of concern. Both Alternatives 2 and 3 lack the balanced approach of Alternative 4.

Our area of concern primarily involves land disposal and acquisitions. Regarding land disposal, Alternative 4 includes areas of suitable size and location to allow for community expansion, agricultural entries, public use and other purposes that may occur over the life of the plan. Most of the land so designated actually will remain in federal ownership but having a large "pool of land" to select from is important. Mere designation of availability does not mean all lands will be disposed as some may be inclined to believe. We notice that some of the lands so designated include steep mountainous areas, playas and areas where water for agriculture may not be available. These lands will likely remain in federal ownership.

49-1 We would strongly urge that, in addition to the lands designated for possible disposal on the map, a statement be included in the plan which would allow for the disposal of land through the Recreation and Public Purposes Act wherever it is needed by state and local governments. There are situations where public lands are needed for non-federal government purposes which may not fall within the areas designated for disposal. Such language in the plan would preclude the need to amend the plan when a desirable public need for land occurs outside a area designated for disposal.

A second item of concern relates to proposed acquisitions of private land in various locations of the plan area. In Alternative

49-2 4, 1680 acres of private land are proposed for acquisition by the federal government "...if economically prudent and if the owner is agreeable...". Conditioning such purchases upon a willing seller is commendable; however, in an area where federal ownership is almost exclusive, we question the need to acquire some of the few private lands available. The impression given that private ownership will inevitably lead to a loss of the resource desired to be "protected" under public ownership is not necessarily valid. We would urge that, in addition to acquisition, other alternatives such as conservation easements or management agreements be considered and only if there is a identified threat to the resource that needs to be abated. Acquisition, if absolutely necessary, should be by exchange whenever possible. Language to cover the points mentioned above should be added to the plan.

49-3 On page 4-83 there is a statement that there will be no disposal of the 3840 acres where agricultural entry has been applied for on lands underlying the Military Training Route north of the Tonopah Test Range. This MTR is not shown on any of the maps and we are not sure which lands are affected. It would also be helpful to know the activities and limitations which apply to this particular MTR to determine what impacts may occur which would adversely affect private ownership. The presence of a MTR should not automatically preclude the possible expansion of agricultural activities in this vast area of federal ownership. Such lands should remain open to agricultural entry with the applicant given information regarding possible disruptive military activities affecting the land, if they exist.

49-4 We are aware of many Carey Act applications for agricultural land throughout the plan area which are not indicated for possible disposal. It is not clear if the 28,314 acres identified for agricultural entry includes Carey Act lands. The Carey Act acreage should be included, if it is not already, or the text should be modified to clearly indicate that any Carey Act applications will be honored wherever in the plan area they are located.

Thank you for the opportunity to comment.

Sincerely,

Mike Del Grosso
Planner

cc: Nevada State Clearinghouse

50

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

September 20, 1993

Area Manager
Bureau of Land Mgmt.
P.O. Box 911
Tonopah, Nv. 89049

My comments on the Tonopah RA RMP/EIS are:

I prefer Alternative 2.

50-1 Page 2-38: How wide of a scenic corridor will be managed along 5 roads? What criteria will be used to determine "might be disturbing" to wildlife?

50-2 Ambiguity invites lawsuits. Replace with "will significantly disturb". Can new roads be built to non-communication facilities in bighorn habitat?

50-3 Page 2-39: Can 1,440 acre withdrawal be replaced with restriction on surface use only? Why can't the blanket ban on roads in tortoise washes be replaced with language permitting roads provided no adverse impact?

50-4 Why isn't the Railroad Springs ACEC limited only to riparian areas (Page 4-23 says area has "little value as wildlife habitat")?

50-5 Page 2-42: Why ban new roads and gravel pits in 2 archaeology complexes, even if an inspection reveals no archaeology present at a planned project? Achieve goals with less restrictive stipulations.

50-6 Page 2-43: What weight will cost have as a factor in determining whether an alternate route is feasible in right-of-way avoidance areas?

50-7 Page 2-45: Why isn't oil production stated as a compatible land use in the Railroad Valley ACEC? Is it BLM's intent to ban all new road construction by limiting vehicles to existing roads, or simply to ban off-road events? I support the reduction in NSO acres.

50-8 Page 2-48: Why does BLM close 3,264 ac. to leasing when a No Surface Occupancy stipulation would achieve the same goal with less restriction? Advances in drilling technology allow for a more extended reach in unique situations than was thought feasible just a few years ago. Why can't restrictions on geophysical exploration be automatically waived if no significant surface disturbance will occur (e.g., laying cables by hand)?

Page 2-52: Incompatibility is in the eye of the beholder. "Significance" is subjective too, but injects some reality and honesty. Determinations should read, "No land uses will be authorized which are significantly incompatible...."

50-9 Page 2-55: The trigger for a cultural resources inventory is too sensitive. Inventory should not be required if an area is so altered by man (chaining) or nature (playas) that cultural resources have lost their integrity.

50-10 Page 2-56: How can a project which does not create ongoing activity increase damage or vandalism to archaeology? Will all archaeology which is avoided be marked? Who will do monitoring after project is finished?

Page 3-20: Benefits of developing wildlife habitat in Railroad Valley should inspire a more proactive approach, rather than more restrictions. How much wildlife would be there if man had followed the current fad of no development?

50-11 Page 4-81: Why isn't No Surface Occupancy stipulation used in lieu of more restrictive No Lease stipulation on 3,240 acres?

Page 4-84: Railroad Valley ACEC is too big given high oil potential, low wildlife value, and right-of-way avoidance stipulation. Allow right-of-way only if destination is within ACEC (e.g., oil well).

50-12 Page 4-87: Do seasonal bans on oil field maintenance include production? What about emergencies (e.g., collapsed casing, formation damage)? How much will directional wells increase production costs (e.g., worn tubing)? What time frame will be used to measure success of requiring reclamation to a natural appearance? This vague statement could require reclamation faster than nature.

50-13 Page 4-88: While directional wells are not an operator's first choice to drill 2,560 acres of moderate potential leases, it is certainly preferable to no leasing. Use a less restrictive stipulation (no surface occupancy), rather than no leasing.

50-14 Page 4-91: To what extent did BLM look for evidence that added costs and restrictions do not discourage exploration? The huge drop in drilling over the least decade and huge increase in regulations are more than coincidence. What areas are referred to when it is stated resource protection costs are incidental and found in "every exploration area"? Do all countries require T&E surveys, archaeology surveys, EAs, EISs, RMPs?

50-15 4-93: The cumulative impacts of oil and gas development are too small. Pad dimensions omit any space for a reserve pit. Projecting 60 new injection or producing wells, but only 7 miles of new pipeline would require wells spaced 616' apart - contrary to state rules. A 25 mile long pipeline with only 47 acres of disturbance would allow for only a 16' wide right-of-way.

50-16 4-99: Why is data gathering viewed as having a negative effect on cultural resources? This policy ignores the fact nature destroys cultural resources without any aid from man. Is natural destruction better than artificial preservation?

Please send me a copy of the final RMP/EIS.

Sincerely,

Brian Wood

Brian Wood

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

51

Green Ridge Water Company
4321 Sunrise Avenue
Las Vegas, Nevada 89110

September 23, 1993

Theodore J. Angle, Area Manager
Bureau of Land Management
Tonopah Resource Area
Box 911
Tonopah, Nevada 89049

Re: CAREY ACT APPLICATION N-53748

Dear Mr. Angle:

In response to your request for input on the Resource Management Plan, I would like to address the treatment of my Carey Act entry referenced above under alternative 4.

These are some of Nevada's most prime vegetable soils and together with other lands in the area, such as those in the Fish Lake, Smoky and Railroad Valleys, create an economically viable agricultural development. This development would include processing plants, now on the drawing board, to be centrally located in Tonopah. Employment generated by these plants would ultimately be approximately 300-400 directly-related jobs.

51-1 In the RMP on page 4-83, it was stated that the application should be denied based on "the negative effects of low level, high speed flights on human beings and animals". The only resident population at our site would be project employees. This site is only three miles north of the Tonopah Test Range main gate and man camp which would be far more adversely affected than our farm land be if these flights are indeed hazardous.

Respectfully,

Roger Hockersmith

Roger Hockersmith
Green Ridge Water Company
cc: Nye Board of Commissioners
Ron Williams, Nye County Planning
Senator Richard Bryan
Senator Harry Reid
Congresswoman Barbara Vucanovich
Tonopah Economic Development Task Force,
Trish Rippie

52

September 23, 1993

RMP Comments
Area Resource Manager
P.O. Box 911
Tonopah, NV

Dear Area Resource Manager:

The recently released Resource Management Plan proposes several plans for the ghost town of Rhyolite, NV. Why did you choose the one that does less to protect the area as your preferred alternative? To only set aside a couple of blocks that would comprise the sixty (60) acres does not protect the bulk of the townsite. The town was platted with over four-hundred (400) acres and there are ruins all over them.

(page 1 of two pages)

September 23, 1993
RMP Comments, Area Resource Manager, P.O. Box 911, Tonopah, NV
(Page 2 of two pages)

Please protect all of the area by designating it as an area of critical environmental concern as proposed in Alternative 3. Do not jeopardize the rest of the townsite by leaving it out of the plan. I am very happy to see more interest in Rhyolite in this Resource Management Plan, but feel that if you are going to do anything, you need to go for the whole site. Couldn't the whole ghost town image of Rhyolite be changed if massive tourist shops could move onto nearby property outside of the sixty (60) acres? The beauty of this area is in its purity as a ghost town.

Sincerely,

Mary M. Lynch
P.O. Box 85
Amargosa Valley, NV 89020

53

PEER
PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

September 24, 1993

RMP Comments
U.S. Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada 89049

Dear Resource Manager:

Please consider the following letter and attachments to be our official comment on the Tonopah Resource Management Plan.

53-1 The proposed RMP excludes an important resource value that exists within the Tonopah Resource Area. There are several significant exposures of fossils in this region that are ignored in the plan. Several changes to the proposed RMP could take this important resource value into account. I suggest you include one or more of the following in the Tonopah Resource Management Plan:

1) Conduct a cadastral survey (some of the Esmeralda Fm. area has never been surveyed to the section level);

2) Conduct a detailed geologic mapping on a 7.5-Minute scale;

3) Conduct a detailed inventory of the known paleofloral and paleofaunal sites in The Esmeralda Formation;

4) Designate the fossiliferous area in the Esmeralda Fm. to be a Research Natural Area, such as The Fossil Forest Research Natural Area in The San Juan Basin of New Mexico;

5) Designate the area to be both a Research Natural Area and a National Natural Landmark, similar to the designations for The Garden Park Fossil Area near Canon City, Colorado and eight other sites on BLM lands; and/ or suggesting that the management of the area be turned over to the National Park Service.

I hope you find these suggestions useful.

Sincerely,

Jeff DeBonis
Executive Director

Headquarters: 310 First Street, NE, Suite 580, Washington, DC 20002 • (202) 408-0041 • FAX (202) 842-4716

54

KENNETH M. REIM
MINING ENGINEER
2733 Billy Casper Drive
Las Vegas, NV 89134-7814
(702) 254-2764

September 24, 1993

Mr. Theodore Angle
Area Manager
Tonopah Resource Area
USDI, Bureau of Land Management
Military Circle, Building 102
P.O. Box 911
Tonopah, Nevada 89049

Re: Comments on Draft Tonopah Resource Management Plan (TRMP) and Environmental Impact Statement (DEIS), June 1993

Dear Mr. Angle:

I wish to comment on the above referenced TRMP DEIS. The first area of my comments are related to the presentation of minerals on pages 3-21 to 3-24, 4-93 to 4-98, Maps 53 to 62, and the other related sections of the DEIS.

- The USDI, Bureau of Land Management (BLM) State Offices have the responsibility for the classification of Federal lands for the potential of all leasable minerals. This responsibility was formerly with the Mineral Classification Branch, Geological Survey, USDI.

54-1 • The BLM classification categories for leasable minerals are "Known Lease Area" (KLA), or "Known Geologic Structure" (KGS) for oil and gas, and "Prospectively Valuable". In this TRMP DEIS, lands are classified as having high, moderate and low potential for leasable minerals. This classification in the DEIS is inconsistent with the BLM's classification which is used by the BLM to issue mineral prospecting permits, or grant competitive mineral leases. Lands classified by the BLM as being "known" to contain leasable minerals, is not the same as being designated as "high potential"; this should be corrected and considered in the EIS environmental analyses and Record of Decision.

54-2 • In T1S, R35E, the BLM mineral classification map shows an area to be "Known Geothermal Resource Area" (KGRA) and "Prospectively Valuable for Geothermal Resources" (PVGR), whereas, on the DEIS Map 54 the area is shown to be "moderate potential for geothermal". This error in classification should be corrected.

54-3 • In the southeast corner of T10N, R42E, the area is classified as KGRA, whereas, in the DEIS on Map 53 it is classified as

COMMENTS ON DRAFT TONOPAH RESOURCE MANAGEMENT PLAN

high geothermal potential; this should be corrected. The words "known" and "high potential" have different meanings.

54-4 • An area in T10N, R49 &50E is classified as PVGR, however, is not shown on Map 53. The BLM has responsibilities for the management of mineral resources on Federal lands, and this should be addressed in this DEIS, even though the Forest Service, USDI manages the surface resources in this area.

54-5 • In T7-10N, R56 &57E the BLM has classified five areas as "Known Geologic Structures" for oil and gas, whereas, on the DEIS Map 53 shows these areas, and the surrounding area, as having "high potential for oil and gas". These classifications are inconsistent and should be corrected.

- The leasable mineral classification specialists, under the direction of BLM Deputy State Director, Mineral Resources, should provide the classification terminology for use in the classification of leasable minerals in Resource Management Area's RMP EISs; this should be the same terminology. Also, these specialists should update the information based on the current level of available information, and provide such for inclusion in the various proposed Resource Management Plans.

54-6 • In the section References Cited, I see no reference to BLM, or Geological Survey, USDI, map classifying Lands Valuable for Geothermal Resources; this should be included as a reference.

54-7 • In reference to locatable minerals, the Bureau of Mines, USDI has the responsibility for the classification of Federal lands for the potential of locatable minerals. The Bureau of Mines Special Report "Availability of Federally Owned Minerals for Exploration and Development in Western States: Nevada, 1985" by W. Dean Crandell and Michael M. Hamilton, classifies lands for select locatable minerals as "High Value KMDA (Known Mineral Deposit Areas)" and Moderate Value KMDA". This Bureau of Mines, USDI publication has not been referenced and apparently not been used in preparing this DEIS RMP. Maps 61 and 62 show areas for locatable mineral potential as high, moderate and low. The word <u>known</u> has a different meaning than <u>high potential</u>; the terminology of the Bureau of Mines, USDI which has the responsibility in the United States Department of Interior for classifications of land for locatable minerals should be used. On Maps 61 and 62, the mineral classification areas do not conform to those shown in the above referenced Bureau of Mines 1985 report; this needs review and correction prior to completing the environmental analyses and issuing the record of decision. This TRMP DEIS does classify locatable minerals on lands where the Forest Service, USDI manages the surface; this should also have been done for leasable minerals for completeness and consistency.

54-8 • The mineral availability from Forest Service lands has a significant influence on the present and future socioeconomics

of the area, and needs to be a part of the TRMP environmental analyses and Record of Decision.

54-9 This TRMP DEIS in the appendices includes reference material on forage plant species, desired plant communities, visual resources, range improvement projects, forage allocations, livestock and wild horse & burro use, recreation opportunities, cultural resources and etc.; however, includes nothing on minerals which provides next to the highest in employment and earnings in this Resource Management Area. There should be included a list and map of present and past mineral production by mineral districts. This missing information fails to deal clearly with the most important resource of this area, and results in a bias unfavorable for minerals. This needs correction prior to completing the environmental analyses and making a "Record of Decision" for this Tonopah Resource Management Plan.

54-10 In a report prepared by Employment Security Research, Nevada Employment Security Department entitled "Nevada Employment and Payrolls, 1991" reports the following data:

	Nye County		Esmeralda County	
	Employment	Payroll	Employment	Payroll
Total	10,860	$384,272,325	408	$10,051,231
Mining	1,633	$ 61,255,308	186	$ 5,887,941
% Mining	15.0%	17.6%	45.5%	58.6%
Mining average annual pay		$37,511		$31,656

The Nevada Employment Security Department reports the mining employment category to have the highest annual pay of any job category in the State of Nevada, and with an associated secondary employment multiplier of 2.5. However, the hotel, gaming and recreation group, is one of the lowest paid group of employees in the State of Nevada, with a secondary employment multiplier of 2.0. Mining with its secondary employment is of primary importance to the socioeconomic well being of this Tonopah Resource Management Area. Further information in this area can be obtained from the Employment Security Research, Gary Lungstrom (702) 687-4550. The section on Social and Economic Conditions, pages 3-25 to 3-30 should be updated from the 1989 date listed to the above 1991 data, or 1992 data if available, and used in the environmental analyses and Record of Decision.

This TRMP should maximize the multiple use of public lands, including minerals, with a minimum of bureaucratic red tape; the plan President Clinton is implementing for "Reinventing Government". The United States Department of Interior through its Bureau of Land Management has the responsibility to encourage and assist mineral exploration, development and production as required by the Mining and Minerals Policy Act of 1970 (84 Stat. 1876) and National Materials and Mineral Policy, Research and Development Act

of 1960 (94 Stat. 2305-2310).

It is recommended the Preferred Alternative consist of the following alternatives for the following issues as given on pages Summary-2 and Summary-3:

Issue	Alternative
Wild horse and burro management	1
Special management areas	2
Off highway use	1
Wilderness study areas returned to multiple use	2
Utility corridors	4
Mineral exploration and development	2

Your careful consideration of the above comments is requested. Thank you for the opportunity to comment of this DEIS TRMP.

Sincerely,

Kenneth M. Reim

Kenneth M. Reim

cc: Commissioners
Nye County
Tonopah, NV 89049

Mr. Tom Leshendok
Deputy State Director, Mineral Resources
Nevada State Office
USDI, Bureau of Land Management
P.O. Box 12000
Reno, NV 89520-0006

Mr. Billy R. Templeton
Director, Nevada State Office
USDI, Bureau of Land Management
P.O. Box 12000
Reno, NV 89520-0006

Senator Harry Reid
United States Senate
500 South Rancho Drive
Las Vegas, NV 89129

Representative Barbara Vucanovich
U.S. House of Representatives
6900 Westcliff Drive
Las Vegas, NV 89128

55

PEARSON AND SHAW (excerpts from original letter)

55-1 Page 2 - The RMP is procedurally defective in that it was prepared without consultation with the Board of Nye County Commissioners, in violation of and in spite of the existence of a Memorandum of Understanding ("MOU") between the Board of Nye County Commissioners (Tonopah, Nevada) and the District Manager, Battle Mountain District (responsible for the Tonopah Resource Area office and this RMP), and the Bureau of Land Management, Nevada, dated 13 August, 1981, and signed by the BLM Battle Mountain District Manager, and assigned the designation BLM MOU 1600-NEV-151.

55-2 Page 2 - On February 5, 1992, the Nye County Board of Commissioners sent a memorandum to a number of BLM officials, including the Tonopah Area Resources Manager, the BLM Battle Mountain District Manager, the BLM Nevada State Director, the Director of the BLM, and the Secretary of the Interior notifying each of these officials of Nye County's desire to participate in the federal land use planning efforts (see exhibit 13). Yet Nye County officials and staff were merely notified of public review and comment opportunities in the Tonopah RMP process. No meaningful attempt at coordinated BLM/Nye County land use and resource planning has occurred.

55-3 Page 3 - The Draft Tonopah RMP does not identify the areas in which the alternatives conflict with Nye County's Policy Plan for Public Lands, nor does it attempt to reconcile the several inconsistencies with this plan with Nevada State law.

55-4 Page 4 - For example (but without limitation), the Appendix on Allotment Categorization does not provide a description of the assumptions or methodologies used to arrive at the conclusions outlined in the table.

55-5 Page 5 - Other maps in the RMP are simply incorrect. For example, but without limitation, RMP Map 1 fails to show much private property including approximately 110 acres of fee property owned by Nye County rancher Wayne Hage at McKinney Tanks on U.S. highway 6, 40 acres of fee property owned by Pearson & Shaw at a warm springs near Mosquito Creek, 40 acres of fee property owned by Pearson & Shaw at Combination Spring north-east of Belmont, approximately 120 acres owned jointly by Trish Rippie and Pearson & Shaw east and south-east of Belmont, and 80 acres owned jointly by Trish Rippie and Pearson & Shaw at Danville.

55-6 Page 5 - RMP Maps 30 and 32 do not provide sufficiently detailed information to determine if any of Pearson & Shaw's fee properties are adversely effected by proposed right-of-way avoidance areas.

55-7 Page 5 - RMP Maps 34, 35, 36, 37, 38, 39 and 40, do not provide sufficiently detailed information to determine if any of Pearson & Shaw's fee properties are adversely effected by proposed withdrawals and classifications of adjacent areas.

55-8 Page 5 - RMP Maps 25, 27, and 29 fail to show an existing utility right of way for a 66,000 volt transmission line from Alkali Springs to Goldfield, and an existing telephone utility right of way from Tonopah to Goldfield. Does the BLM Tonopah Resource Area Office intend to interfere with the operation, maintenance, and improvement of these utility lines?

55-9 Page 5 - The draft RMP appears to represent a criminal conspiracy to engage in extortion and to deprive property owners, resident, and businesspersons of Nye and Esmeralda Counties of their rights to due process and to many other rights guaranteed by both the U.S. Constitution and State of Nevada Constitution. For example, under Alternative 1 (incorrectly, deceptively, and fraudulently described as "No Action") "Community expansion at Tonopah, Round Mountain, Silver Peak, and Beatty would by restricted." No legal or scientific justification is provided for these restrictions. There are no allegedly endangered or threatened species or alleged areas of critical environmental concern (ACEC) near Tonopah, Round Mountain, or Silver Peak. These threats are attempted extortion to force the threatened communities to accept the changes in policies and regulations preferred by the BLM Tonopah Resource Area Office and contained in Alternative 4.

55-10 Page 8 - This is an outright lie. The BLM Tonopah Resource Area Office's idea of "coordination" is to write a plan in which none of the features of the county plan appears. Pearson & Shaw frequently attend meetings held by the Nye County Commissioners. There has been no "coordination" between the BLM Tonopah Resource Area Office and Nye County. They have included this lie because they are required to consider the county plans. If this Draft RMP had been developed involving members of the Public in Nye County, Pearson & Shaw and the Nye County Commissioners would have objected to the plan during its development. The BLM Tonopah Resource Area Office never gave the Public or Nye County a chance to provide input during the BLM Tonopah Resource Area Office's writing of this plan. Only after the BLM Tonopah Resource Area Office completed this very lengthy

(over 1" thick report) have they presented it to the Public in Nye County for a brief period of comment. The provisions of all four of the alternatives considered by the BLM Tonopah Resource Area Office would do great harm to the residents, businesses, local governments, and the environments of Nye and Esmeralda Counties because of insufficient attention paid to the mechanisms of both economic activity and of environmental protection. Indeed, the document is a masterpiece of ignorance of the importance of private property rights to both the economy and environment of Nye County.

55-11 Page 11 - Executive Order #12630 requires that agencies such as the BLM consider the implications of their policies and regulations in light of the "Takings" clause of the Fifth Amendment of the U.S. Constitution. Nowhere in this BLM Tonopah Resource Area Office RMP is there a mention of the constitutional implications of the plan's host of new rules and regulations, which are certain to result in "takings" suits against the Federal government.

55-12 Page 11 - The arbitrary and capricious closing of many roads and prohibition or limitation of off-road travel proposed under this RMP will deprive many property owners of the use of their property, including but not limited to patented and unpatented mining claims and patented agricultural real estate and water rights granted under Nevada State law, and repeatedly recognized by the U.S. Supreme Court.

55-13 Page 12 - The Tonopah Resource Area Office proposes to prohibit vehicular travel within 300 feet of several creeks, including Mosquito Creek, thereby depriving Pearson & Shaw of the use of their patented fee simple property and associated water rights.

55-14 Page 12 - If the BLM Tonopah Resource Area Office's RMP interferes with Pearson & Shaw's use or development of this property or impairs its market value, Pearson & Shaw will institute a takings suit against the BLM, and will encourage others with properties similarly adversely impacted by the proposed ACECs to joint together in a class action suit against the BLM. Moreover, Alternatives #3 and #4 would preclude access to Pearson & Shaw's property in this area if roads "which are not mechanically maintained" are closed or deemed not to be roads by the BLM Tonopah Resource Area Office (see Maps 50 and 52); this would also constitute a taking requiring compensation.

55-15 Page 13 - The BLM Tonopah Resource Area Office's RMP includes provisions for closing public roads, including most of these roads which are not "mechanically maintained".

55-16 Page 15 - One of the features of the BLM Tonopah Resource Area Office's RMP that is supposed to protect the environment is to decrease or eliminate much of livestock grazing on the public lands now used for such grazing.

56

Sept 26, 1993

To: Area Manager
Tonopah, Nev. BLM office.

Dear Sir,

In response to your resource management plan I would like to make a few statements.

First, I am part owner of some land at Locke Ranch and am surprised that no attempt was made by your office to include any land owner concerns in your original planing. It is my firm belief that people living on Locke Ranch will provide the spring fish with much more protection than they will have if the land is uninhabited, knowing the types of people traveling todays highways. It is unclear to me in reading the draft if all the springs on the ranch are included or just the two specifically named. When I grew up there we called them Big spring, Reynolds spring, North spring, Swimming hole, Spring under the rocks, so do you include them all or just the North Reynolds spring. During my time there I saw no reason and still don't to be overly concerned with the fishes survival. They always had a good number in anyone place and didn't appear to suffer from stream diversion while irrigating.

56-1

My personal concerns are, will I be able to fulfill my life dream of retiring on the ranch in a few years and also what are your intentions towards the family graveyard.

My suggestion is that you leave things be for another 20 year and by that time my family members will all be dead and gone and no one will care what you do. I measure the fish will survive as they have for the last several thousand year without a bureaucrat overseeing them. I believe an earthquake is their biggest threat to survival.

Also I have 160 acres of land in Sarcobatus Flats in southern Nye county. Do you have any planned restrictions on land use in that area.

56-2

Also I have part interest in some patented mining claims in the Reville District. How will that interest be affected.

Also I have a mining claim in the Cedar Mountains of NW Esmeralda County. Are there any specific restrictions planned for that area.

I would appreciate a reply if possible. My address is

John Locke
411 Guadalupe Dr.
EL DORADO Hills, CA 95762.

Thank you.
John Locke

RECEIVED
BUREAU LAND MGMT
TONOPAH RESOURCE
TONOPAH

57

26 Sept 93

Dear Sir:

Please be advised I strongly urge adoption of Alternative 3 as the best means to protect the historic ruins of the townsite of Rhyolite. It affords superior protection in terms of land area, allows for possible acquisition of private holdings in the area - eg the Train Depot - establishment in the future of scenic byways etc.

The preservation of the ruins of Rhyolite and its surrounding areas provides us with the opportunity (over)

that will not occur again if not taken to make sure that a significant segment of the history of Nevada and indeed California boom and bust mining heritage can be saved to interpret our heritage for future generations to appreciate and understand.

Alternative 4 just does not go far enough to afford the needed protection.

Thank you

Leon M. Abrams

RECEIVED
TONOPAH RESOURCE AREA

LEON M. ABRAMS
2041 FRANCISCO #3
BERKELEY, CA. 94709

58

Bureau of Land Management
Nevada State Office
PO Box 12000
Reno, NV 89520

September 10, 1993

Attention Billy R. Templeton
State Director

Dear Mr. Templeton,

My name is Al Drayton. I own property at Locke Ranch in Railroad Valley and work in the north Trap Springs field with fluid minerals. I want to comment on the Tonopah Resource Management and Environmental Impact Statement.

I strongly opppose the Resource Management Plan. It suggests acquiring my property at Locke Ranch and preventing future purchases of oil leases in north Trap Springs in Railroad Valley.

I have attended two BLM meetings held for comment on the RMP & EIS. There were aprroximately 10 people present at the Las Vegas meeting on August 19 and 45 people present at the meeting in Tonopah on August 26. Nearly every affected industry (mining, ranching, oil) in the resource area was represented at the meeting in Tonopah. At no time was there one comment in favor of the RMP. Infact, at a Nye County Commissioners meeting in Tonopah on September 8, Mr. Ted Angle, Area Manager and Mr. Hal Zabriskie, RMP Team Leader were questioned and asked if anyone had agreed with the RMP. Their response was "no one has agreed".

I agree with Nye County Commissioner, Richard Carver, that the RMP & EIS should be scrapped and a new plan drawn up with participation from Nevada State and Nye County elected officials, as they represent the people who would be affected by this plan.

Thank you for your time and attention.'

Respectfully yours,

Al Drayton
HC 76 BOX 9610
Tonopah, NV 89049

59

NEVADA ARCHAEOLOGICAL ASSOCIATION

Rainbow Postal Center, Suite 29, Box 143
6370 West Flamingo Road
Las Vegas, Nevada 89103

September 29, 1993

Bureau of Land Management
Tonopah Resource Area Manager
Post Office Box 911
Tonopah, Nevada 89049

re: *Tonopah Resource Management Plan and Environmental Impact Statement*

A last minute requirement to be elsewhere prevented attendance at the public meeting held in Carson City on August 17, 1993; therefore, we must submit our comments on the Tonopah *Resource Management Plan and Environmental Impact Statement* in writing.

The Nevada Archaeological Association (NAA) is a statewide organization of professional and avocational archaeologists. The NAA has chapters or affiliates in White Pine, Elko, Washoe, Lincoln, and Clark Counties. Together, this directly represents about 500 persons. With family and friends, the NAA's sphere is much broader. We are the only active statewide organization that can speak to historic preservation and other cultural resource matters.

We are students, doctors and nurses, state and federal employees, hunters, artists, fisherman, horseback riders, four-wheelers, miners, geologists, cultural resource management professionals, backpackers, historians, and sightseers. We are all, as individuals and families, intensive users of Nevada's public lands. What happens to public land within our State is of utmost concern. It is from this position that our letter issues.

Let us begin by saying that we appreciate being given the opportunity for involvement in the document's review and we are also aware and appreciative of the great effort and many hours of work that went into its development.

There are three major areas on which we will comment... the protection of Rhyolite, the designation of Areas of Critical Environmental Concern (ACEC), and paleontological resources. We also have a few general observations regarding the document's configuration.

Our recommendation is that, barring any modification of Option 4 to address our concerns, Option 3 be adopted. Option 4, which is designated as the Bureau's preferred plan, provides too little protection for cultural and visual resources.

The initial issue is that of the preservation and protection of Rhyolite. Most of the options presented do not adequately protect the Rhyolite townsite and surrounding area. We feel that several things must be considered when approaching any plan for the town.

The first is the protection of Rhyolite *visually*. That is, much of the attraction to Rhyolite is in its setting and although the late twentieth century is a presence in and around the town, any additional deterioration of the setting should be avoided at all costs. Additional development, beyond that needed for interpretive purposes, including mineral exploration and extraction activities should be extremely limited or prevented altogether where it will visually impact the Rhyolite townsite. In addition, efforts should be made to stabilize what remains and protect it from further deterioration.

59-1

Maintenance of the overall integrity of the town site is also of importance to the NAA. Because of numerous private in-holdings within, and adjacent to, the town site, we feel that the Bureau should move quickly to acquire such parcels before further development, over which the Bureau has little or no control, can occur. Such development would jeopardize not only the visual integrity of what

59-2 remains of the town, but also threaten or destroy its physical integrity and the archaeological record. *No where does the plan examine or consider the consequences to Rhyolite of not acquiring additional lands in and around the townsite.*

Of the options presented, only Option 3 begins to adequately protect Rhyolite. The others appear to openly invite its destruction.

59-3 Next we will address the designation of ACECs. While our major interest is directed towards cultural resources and those designated as ACECs, the manner in which any ACEC is designated is not clear, nor does the process appear to be flexible enough to evolve further designations over the coming years.

59-4 Specifically, the Tonopah Resource Area is not well known nor understood from a prehistoric perspective. Little directed research has occurred within its boundaries, and much of the Area is simply uninventoried. To adopt any management plan which locks in the designation of ACECs for any resource, much less for cultural resources, over an indeterminate period is severely lacking. As the knowledge base expands within the Resource Area, the management plan must be flexible enough to allow additional designations over time. Of the proposed plans, only Option 3's designation of ACECs is adequate, but then only as a point of departure.

59-5 Overall, we are somewhat mystified by the lack of any discussion of the paleontological resources within the Tonopah Resource Area, and are sure that this is an inadvertant oversight. Regardless of the reason for its exclusion, it is a serious shortcoming. There are extremely important fossil localities already known within the Resource Area; to leave these with no management plan is unacceptable. We hope that the final adopted plan will fully address paleontological resources.

59-6 We have two final observations regarding the document. The review and update process is not clear (see especially the comments made above regarding the designation of additional ACECs). On page 2-63 the matter is dealt with as follows: "Maintenance will be done to keep the plan current and extend its useful life." In reality, this says nothing. An explicit, and detailed, exposition of this "maintenance" is needed.

59-7 Finally, the document's organization, or structure, makes it extremely difficult to follow. One must constantly flip back and forth between options and subject areas. Perhaps organizing the report along topical lines would make it more clear (i.e. Wilderness: Options 1, 2, 3 and 4; Recreation: Options 1, 2, 3 and 4, and so on). If no change in the document's basic structure is possible, perhaps it would be better served by summarizing the options topically in a table format.

If there is a need to discuss further any of these comments made on behalf of the Nevada Archaeological Association, please contact me directly at Post Office 704, Carson City, Nevada 89704, or call (702) 882-1506.

Thank you.

Sincerely,

David S. Johnson

David S. Johnson,
President

cc: NAA Board of Directors
Chapters
Affiliates

60

September 28, 1993

RMP Comments
U.S. Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV. 89049

Dear Sir:

60-1 My father, a senior research fellow at Northeastern Illinois University, recently sent me a xerox copy of page 15 from the "American Paleontologist" August 1993 concerning 6.1 million acres of the Tonopah Resource Area lands and the management of the same. The article states that "...abundant and extemely large silicified longs, (sic) including (according to a 1934 report) what may be the world's largest petrified log, 14 feet in diameter and 200 feet in length." can be found within the Area. The article also said " The Plan does not, however, contain mention of what may be extraordinary fossil vertebrates, mollusks, and ostracodes, ..." WHAT!!!! You guys aren't going to save the fossil areas from trepidation and work with the state to preserve an ancient forest near Coalville!! Good grief! Nevada has precious few areas set aside for its citizens' edification. What a state park a forest of silicified trees would make. Just imagine all the school buses of polished and sneaker shod school kids pouring out of yellow buses for an overnight campout in an ancient forest. If the rock shop owners in Fallon haven't fractured the trees to smithereens lets "Save The Trees" of Nevada. I intend to alert the Reno Gazette Journal in the morning and try to find a friendly ear at the state museum in Carson City. If nothing else I intend to make a real pain of myself.

Sincerely,

Deborah Hay Owens

Deborah Hay Owens
1435 Sioux Trail
Reno, NV. 89511-9014

61

27 September 1993

Bureau of Land Management
Tonopah Resource Area Manager
PO Box 911
Tonopah NV 89049

Dear Sir:

After reading the draft of the Tonopah Resource Management Plan, and actually staying awake through most of it, I have to admit that it is a very cleanly written, well done statement. I commend everyone who was involved in the work thus far, and those who will be involved in the future.

I read, with obvious special interest, Alternatives Two, Three and Four as they pertain to Rhyolite and the Bullfrog HMA. I can't begin to tell you how happy I am that the Alternatives are there at all! Very few years ago, as Alternative One shows, Rhyolite was merely "four acres classified under the Small Tract Act..." and nothing more. Thank you for seeing that there is a reason to keep that forgotten town alive. Thank you for giving the people a voice. Thank you for not allowing Rhyolite to stay "four acres classified under the Small Tract Act..."

Now for a few specific statements:

1. I hope that Appendix 13 "ARPA law enforcement and monitoring plans will be written for the following areas: Rhyolite..." is going to happen no matter what plan is chosen.
2. Page 4-64, alternative 4, although in my opinion 61 acres is not enough land to be protected in the township, the rest of the paragraph is excellent.
3. Page 4-64, the entire townsite of Rhyolite needs to be withdrawn from mineral entry and definitely BLM needs to be able to undertake the "purchase of valid claims".
4. Page 4-58, I vote 'yes' to the statement beginning "An ACEC would be designated in Rhyolite..." We tend to forget that Rhyolite and Bullfrog were two towns united by their competition to succeed. Senator Stewart would not be amused if he thought that the townsite of Rhyolite was now the only area worth preserving. This may be the only chance we have to make sure the Senator's dreams are not lost forever in governmental red tape.
5. Perhaps one of the most important statements in the entire draft is on Page 4-56: "The acquisition of land at Rhyolite would help to consolidate management of the area." Almost the same statement is reiterated on Page 4-53: "...Acquisition of 645 acres in...Rhyolite...would resolve management problems relating to mixed ownership of the site by bringing the entirety of the townsite under federal control." Without the ability to purchase land as it becomes available, Rhyolite\Bullfrog will never be whole and BLM will never be sure what blocks are public land and what is not (we see this today--it can only get worse in the future). I can only wonder if BLM has really considered what may happen if land acquisiton by their agency is not allowed.
6. Page 4-54 "Designation of an SRMA at Rhyolite...is expected to result in a decrease in vandalism and illegal collection". YES! It's so much easier and cheaper to stop people from doing stupid things (like stealing bottles or trashing buildings) before they do it, than it is to find the evidence and punish people after the fact. Why make BLM Law Enforcement Officers work harder than they have to--why not educate the stupid people with signs and interpretative facilities. Page 3-13: "The historic townsite of Rhyolite is continually subjected to a tremendous amount of theft and vandalism"---well, NOW is the perfect time to do something about it--the chance may never come again.
7. Page 4-37: By withdrawing the Bottle House four acres, BLM has already made "development of the mineral resource around Rhyolite difficult". I say, let's continue and set aside the whole 645 acre townsite and the Bullfrog HMA. It is much easier to say "No mining allowed" than it is to say "Well, you can mine here and over here and see that spot over there..." Let's do the job now instead of piecing it out over the years--think of the paperwork you wouldn't have to do in the future!
8. On Page 3-16 and 3-17, BLM makes the strongest statement about why we need to preserve what is left of Rhyolite. "The ruins...bring tourists from all over the world. It is the most photographed 'ghost town' in Nevada." "This area needs special management...the ruins are in an advanced state of decay." And the most important reason: "RELEVANCE: Historical interest." There can be nothing left to say. Our history is all we have as a people, as a culture. If we can never look back and be able to say 'this is where we were, this is what we did' how can we ever look forward and say 'this is where we are going and this is what we will do'.

Sincerely,

Kathleen Graves
Death Valley

62

Trish Rippie Realty, Inc.

REALTOR®

September 27, 1993

Theodore Angle
Bureau of Land Management
P.O. Box 909
Tonopah, Nevada 89049

Re: BLM Tonopah Resource Management Plan draft

Dear Mr. Angle:

62-1 Enclosed is a letter from Roger Hockersmith regarding his desert land entry application in the Tonopah area. Alternative 4 of the RMP would deny that application based on the supposed danger of low level flights.

We have had low level flights over this area including the living quarters at the Test Range for years, and I can't believe that this could truly be grounds for denying this application.

When the Stealth Fighter was relocated to New Mexico, the Tonopah area went through a severe economic disruption. The fact that we were given a grant by the Dept. of Defense Office of Economic Adjustment to create an economic development plan will attest to that. But when you consider economic development in Tonopah, you have to look at the facts of life. We are very remote, our utility costs are high, we don't have a large skilled labor force, etc. Our chances of attracting industry are extremely limited.

I had never even considered the potential for any kind of agribusiness here until Mr. Hockersmith presented his plan. If he can obtain the necessary acreage to farm, he will build processing plants in Tonopah which could eventually employ between 300 and 400 people.

Despite the fact that Easterners seem to think those of us in the west are exploiting the public lands through cheap leases and desert land entries, that is simply not the case. The cost of converting raw desert to farmland and obtaining water to irrigate can exceed the cost of purchasing farmland in many states. It seems to me that the Bureau of Land *Management* should be helping to develop these western lands for the highest and best good instead of closing them off to any economic function.

We have a chance to get a new business here which would be permanent and not dependent on defense programs or the boom and bust cycle of mining. We are only asking that the BLM cooperate with us in achieving this goal.

Sincerely,

Trish Rippie

Trish Rippie
Tonopah Delegate
Nye Esmeralda Economic Development Authority

cc: Congresswoman Barbara Vucanovich
Senator Richard Bryan
Senator Harry Reid

P.O. Box 3360 • Tonopah, Nevada 89049-3360 • (702) 482-3052 • FAX (702) 482-8705

63

NYE & ESMERALDA COUNTY
Economic Development Authority
MAKING NEVADA GROW

September 29, 1993

Ted Angle, Area Manager
Tonopah Resource Area
Bureau of Land Management
102 Military Circle
Tonopah, Nevada 89049

RE: Proposed Resource Management Plan

Dear Mr. Angle:

The Preferred Alternative in your proposed management plan does not allow for agricultural development on the land north of the Nevada Test Site. With the economy of Central Nevada suffering from layoffs at the Test Site, a declining population as a result of a loss in jobs, and economic hardships encountered by the local business community, we request the BLM revise its plan to include the above mentioned land as open to agricultural development. 63-1

Development of the prime agriculture land north of the test site would be a boost to the local economy by providing jobs for local workers,would contribute to the tax base for Nye County, and would increase federal revenues through the paymentof federal taxes. With the end of the cold war and the reduction in activities at the test site, the reasons for the decision to withhold this land are outdated.

We have been approached by individuals who have developed a plan to turn the desert land north of the Nevada Test Site into a significant agriculture development area through food crops. They have the water rights to the land and are ready to begin exploratory drilling for locatable water. We would like the BLM to consider their plan and vision in any final Resource Management Plan.

Agricultural development of the land would not result in a build-up of population. There is no doubt the highest and best use of this land is through the growing of potato, onion, carrot, and other food crops. By allowing for the highest and best use of the land, the whole country would benefit from its production. We respectfully request the BLM revise its plan to allow for Desert Land Entries and the Direct Purchase of this and other lands which can be developed for food crops.

Sincerely,

Darlys Smith
Executive Director

cc: Jim Baca, Director BLM
Bruce Babbit, Director, Department of Interior
Nye County Commissioners
Esmeralda County Commissioners
Roger Hockersmith
Vernon Cook

P.O. Box 153 Tonopah, Nevada 89049-0153 • Phone (702) 482-8139 • Fax (702) 482-8198

64

Kennecott Exploration Company
961 Matley Lane Suite 120
Reno NV 89502
Telephone (702) 334-2772
Facsimile (702) 334-2770

Kennecott

September 28, 1993

Mr. Theodore J. Angle, Manager
Bureau of Land Management
Tonopah Resource Area
P.O. Box 911
Tonopah, NV 89049

Re: RMP Comments

Dear Mr. Angle:

Please accept these comments for the official record of decision on the Draft Tonopah Resource Management Plan and Environmental Impact Statement dated June 4, 1993. Please make these comments part of the official record.

Kennecott Exploration Company is a resource extraction company with offices in Reno, Nevada and with active mining claims in Nye and Esmeralda Counties. Kennecott has diligently explored for gold deposits for approximately 11 years in the resource area, and we have spent approximately $2 million in the resource area. We feel that we are highly qualified to comment on aspects of the RMP.

Kennecott currently supports Alternative No. 1 to the draft Tonopah Resource Management Plan (RMP) dated June 1993. At the same time, we strongly oppose Alternative No. 4 which the Tonopah BLM has recommended as preferred. Kennecott believes Alternative No. 4 imposes additional and unnecessary restrictions on the use of natural resources within the RMP.

The BLM recommended plan #4 specifically imposes a number of hindrances to natural resource companies that include:

64-1 1. A reduction of off-highway vehicle (OHV) use of 24% by imposing additional restrictions on 1,250,000 acres. This would immediately impact our ongoing programs in the Monte Cristo Range, Montezuma Range, Silver Peak Range, Volcanic Hills and Gold Mountain Area. These areas have all had past minerals production and hold very strong potential for new

discoveries that could add valuable jobs for a depressed central Nevada. By imposing restrictions, the BLM will severely limit access and will make it that much more difficult to develop one of the few economic resources the region has to offer.

64-2 2. Wilderness Study Areas (WSA's) should be returned to multiple use without the stigma of protection of primitive and semi-primitive values. This along with reclamation to "resemble a natural state" are ambiguous, unnecessary and prone to interpretation. These areas to be returned from WSA status have been found to lack suitable characteristics for wilderness and should be governed and managed under existing law.

64-3 3. The designation of utility corridors is a restriction placed on all users of utilities that will restrict the growth of the undiscovered resources of the future. It will impose the use of designated corridors on resources that will probably not be discovered where the BLM thinks they should. Most new mineral discoveries are very capital sensitive and by forcing the use of restricted utility access, the BLM could be imposing undue additional capital cost.

4. No changes should be imposed on Mineral Exploration and Development and especially not ambiguous change related to "preservation and enhancement of fragile and unique resources". There is a serious decline in minerals exploration within the RMP and Nevada in general caused in part by just such restrictions. The BLM by imposing these seemingly innocent restrictions will ultimately be denying jobs and at the same time is pandering to the environmental left. Kennecott has been and will remain a company that is cognizant of environmental concerns and will continue to actively work to preserve natural resources in the conduct of its mineral exploration program.

5. The imposition of "restrictions on minerals exploration and development" under the heading of Cultural Resources is another ambiguous, highly interpretable hindrance to the creation of jobs in the region. There is currently adequate protection of cultural resources under existing State of Nevada and BLM procedures, guidelines and statutes.

64-4 6. In light of the previous comments, it seems a bit ludicrous to state that Locatable Minerals will only be impacted by a loss of 0.4% (from 99.2 to 98.8) of locatable mineral entry. By imposing a myriad of ambiguous restrictions related to physical access, environmental and cultural interpretation and

Mr. Theodore J. Angle-BLM
September 28, 1993
Page 3

increased capital spending, the BLM is imposing a 40% to 50% reduction to exploration and development of mineral resources.

64-5 7. The use of ACEC designation to protect a number of areas seems to by-pass common sense on what really needs to be protected. For instance, Lone Mountain holds 14,400 acres of relatively inaccessible land, and it was earlier not considered to hold wilderness qualities during Wilderness Study designations. If a withdrawal using ACEC criteria is utilized, then defacto wilderness management of Lone Mountain will be attained without congressional approval of true wilderness. The same could be said for Lunar Crater and Timber Mountain Caldera.

At Rhyolite an ACEC would halt future gold exploration within and beyond the 200 acre outline of the proposal. It seems paradoxical that Rhyolite was established as a mining town in our mining boom to bust cycles, and that the survival of a few ruins would eliminate any future resource extraction in the area. The area does not warrant protection.

Designation of some of the wildlife and cultural resource ACECs seem to take more land than what may be required to protect specific values. These areas include: Cane Man Hill, Railroad Valley, Stormy-Abel, and Trap Springs. Further review to reduce their size should be considered.

To reiterate our position, Kennecott supports Alternative No. 1 to the Tonopah RMP which is the choice for no new action. We believe the BLM stewardship should continue at its current level.

Sincerely,

Steven D. Craig
Exploration Manager

SDC/cl

cc: Steve Jones
Tom Patton

65

Herman R. Lindemann 09/27/93
1232 N. Alexandria Ave.
Los Angeles, Ca. 90029

Mr. Theodore Angle, Manager
Tonopah Resource Area
Bureau of Land Management
P. O. Box 911, Tonopah, Nevada 89049.

I am looking at a letter sent to me from Mr. Templeton's office in Reno. It is noted the Tonopah plan is open for public comment until Oct. 1, 1993. Included with the letter are maps 60 and 19.

My feelings of frustration and problem relates, at the present, to the area of interest on the east side of Bare Mt. in townships 11 and 12 S., R. 48 E.

On the Stateline R.M.P. in T. 13 S. R. 48 E it is shown the areas are open to fluid mineral leasing subject to standard terms and conditions. Not explicitly enumerated, not a no surface occupancy, not a closeout or lock-up.

65-1 The letter received states "Desert Tortoise may be present upon the land just east of Bare Mt.". "Both the Las Vegas (Stateline) and Tonopah B.L.M. area Managers have identified the lands east of Bare Mt. as potential Tortoise habitat."

What is the reality, not guesswork? Are they, the Desert Tortoise, physically there or not?

In all of the years and time I have traversed the desert in a wide radius from Beatty I have never seen one Desert Tortoise. So far as I am concerned I ask equal protection under the law as any species. I would believe that many persons have no desire to be caught between overlapping jurisdictions and the conflicts and differences of one government entity and other. Some of the decisions jail our freedoms and smack of harassment.

"Having Choices we don't like is no choice at all."

Always the need of common sense, on-balance structure both for man and wildlife.

The human need not be a sub-species put in a status below the birds, the animals, etc.

Depressing the entrepreneur is depressing the economy, employment, income to people and to those in government and its operations.

Too many factions in policy-making create a status of chaos. Some decisions can doctor our freedoms with harmful side effects, short or long range.

Man should not be forced to live and work away from the Tortoise. Man and the Tortoise can live together as with other creatures, where man needs to protect and be protected.

Mr. Theodore Angle.

I realize it is not a perfect world. There need to be some trade-offs.

I don't believe the east side of Bare Mountain should be closed off or that there should be no surface occupation.

I don't believe it is up to the public or individual to research and spend the money to get the numbers on endangered species of anything. I feel that falls squarely on the Bureaus of Federal Government. If regulations are made and to be made, the backbone of those regulations should be supported and paid by the moneys paying the existence of government bureaus, not doubly burdening people who pay taxes, capital money, etc., already supporting the operations of those Bureaus, departmental and/or subdivisions of same.

I add, in truth and honesty, I have been well-treated with courtesy and consideration by all personnel with whom I have ever talked personally or by phone associated with the Bureau of Land Management.

I see no formula to encompass, protect, address all questions, concerns, solve all problems. However, I believe there is room that things can be done, should be done better.

I can't accept readily any idea that "one says all".

The lands, unless privately or State-owned, are Public Domain for Multiple Use and should never be overridden with the dictums of any regulatory body in the service of the public and charged with handling the Public Domain.

In this era of environmental extremism and obsession, passion I suspect there could be people who would "plant" a Desert Tortoise or more in an area in order to say it is "habitat" in order to get it closed. I feel, in some instances, there could be bogus representations. Things need to be proven "beyond a reasonable doubt."

Perhaps ravens, crows, hawks other creatures endanger the Tortoise more than man and his operations. Educated, considerate, wild-life-conscionable people are less dangerous to the tortoise.

How many Desert Tortoises are needed to become non-endangered? I suggest fencing off an area of the desert where there is no interest for mineral, oil and gas research and exploration for breeding and raising Desert Tortoises to get them off the "threatened" species list.

Reasonable time with management and controls can be acceptable where there is honest need to protect the tortoise anywhere by men of goodwill without handicapping finding our natural resources for humanity's present and future energy needs.

Evaluation of my and the comments of others asked.

Sincerely,
Henry P. Lindemann.

66

NYE COUNTY

September 30, 1993

Mr. Ted Angle
Tonopah Resource Area Manager
Bureau of Land Management
P.O. Box 911
Tonopah, Nevada 89049

RE: Nye County Comments on the Substance of the Draft Tonopah Resource Management Plan and Environmental Impact Statement

Dear Mr. Angle:

This letter provides the Nye County Board of Commissioners' comments on the substance of the June 1993 Draft Tonopah Resource Management Plan and Environmental Impact Statement (DRMP/EIS). The Board of Commissioners provided comments on procedural aspects of the DRMP/EIS in a separate document.

Because of Nye County's limited staff resources and the brief time allotted for review, and because the BLM did not include Nye County as a cooperating agency, our review of the DRMP/EIS is incomplete and our comments are limited to those we were able to prepare within the allotted comment period. We could be able to conduct a complete review if more time were allotted. Consequently, Nye County formally requests an extension of the period for review and comment on the DRMP/EIS.

If Nye County were to develop its own preferred alternative for the management of public lands within the Tonopah Resource Area, it would probably contain elements of each of the four alternatives contained in the DRMP/EIS. But because Nye County was not designated a cooperating agency under the provisions of NEPA, we had limited input into the alternative formulation process. Therefore Nye County must support Alternative 1, despite our reservations that it is not a true "no-action alternative."

Nye County also believes that the BLM's public review and comment process was flawed. We provide our reasons for this opinion in our comments on the procedural aspects of the RMP/EIS process. In an attempt to obtain additional public comment, Nye County held public hearings on the Tonopah DRMP/EIS in the Nye County Board of Commissioners chambers in Tonopah during the

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month of September. The hearings were tape recorded and the recordings transcribed. We have attached the transcripts of the public hearings to this document as Exhibit 1. Please consider these transcripts as part of Nye County's comments on the Tonopah DRMP/EIS.

GENERAL COMMENTS

1. **Inadequate Review Period.** Approximately 93 percent of the land within Nye County is controlled by the federal government. The Tonopah Resource Area includes over 4 million acres of public land in Nye County. The Tonopah DRMP/EIS is expected to provide management guidance to the BLM over the next twenty years for a substantial portion of the public land within Nye County. The plan is also intended to update management direction for a variety of important resources. In some cases the management direction outlined in the DRMP/EIS differs across four alternatives.

   There are a multitude of topics addressed by the DRMP/EIS. The topics and associated issues are complex, requiring both technical expertise and familiarity with the science and practice of resource management for a full understanding. A team of over 40 BLM experts will have spent over three years preparing and reviewing the DRMP/EIS when the final document is issued. Yet Nye County, with one professional planner and no resource management staff, is expected to provide meaningful comment on the document within a three-month period.

   The management direction established by the BLM will significantly affect the economy and lives of many Nye County residents for the next generation. It is important that Nye County and its residents understand the ramifications of the many complex issues addressed in the DRMP/EIS. It is equally important that Nye County be able to participate in the resource management, planning, and environmental impact assessment processes, as envisioned by FLPMA and NEPA. Our comments on participation issues are been provided under separate cover and will not be repeated here; but it is important to reiterate that the comments on the substance of the DRMP/EIS contained in this document are necessarily limited, both by time and by the complexity of the issues. It is Nye County's position that full and meaningful participation in the FLPMA and NEPA processes can only occur if the BLM extends the comment period and reopens the FLPMA process with Nye County as a cooperating agency.

66-1 To this end, Nye County asks the following question: What negative affects to the BLM or others would be associated with a reformulation of the Tonopah RMP/EIS process that would allow Nye County government meaningful participation as a cooperating agency and allow Nye County and its residents a longer review and comment period?

2. **Need for Better Resource Maps.** The maps that accompany the DRMP/EIS are provided at a scale which does not allow for effective review of the differences between alternatives. Although Nye County was able to obtain larger maps, a number of residents have commented that the format and content of the maps were not helpful. Could the BLM prepare maps that contrast Alternatives 1 and 4 for each resource? In some cases the information contained in the maps is not clear. For example, maps 18 and 19 do not state which C2 species are found within the designated areas. 66-2

3. **Legal Basis for BLM Jurisdiction Over Nye County Lands.** In the cover letter, the DRMP/EIS states that the draft was developed to meet the requirements of FLPMA and NEPA. On the inside cover, the Mission Statement says the BLM is responsible for stewardship of our public lands. But the document does not identify BLM's authority for this stewardship nor does it describe the legal basis for jurisdiction. A number of Nye County residents have raised questions concerning the jurisdiction of the BLM over lands in Nye County and the extent of that jurisdiction. Please provide a summary of the legal basis for BLM jurisdiction over lands in Nye County and the extent of the BLM's jurisdiction. For example, does the BLM have law enforcement authority on federal lands in Nye County? 66-3

4. **References.** Throughout the DRMP, statements are made without references. For example, page 3-1 states, "... available data indicate that many water sources do not meet the Environmental Protection Agency's minimum standards for drinking water." What available data? Similarly, the assertion on page 3-28 "...Net ranch income is estimated at $5.25 per AUM." What is the source of this estimate? There are numerous examples of statements and assertions without references. Consequently effective review of the document is inhibited. 66-4 66-5

   In some cases, references are cited in the DRMP/EIS without full citations in the Reference Cited section. For example, on page 4-18 (Impacts Alternative 1: from utility corridors) the citation at the end of the section (Holberger et al, 1975) is not included in the References Cited section. Similarly, the references on page 3-28 (Vale, 1979, Neilson and Workman, 1971, Corbett, 1978) are not listed in the References Cited section. 66-6

5. **Cumulative Impacts of Actions Within Alternatives.** In several sections (e.g., page 3-29 Recreation; page 4-17 Impacts to Economic Conditions from livestock grazing management, etc.), the DRMP/EIS essentially states that effects to particular resource areas would not be of sufficient magnitude to have any significant impact. While Nye County does not agree with that statement in all cases, it should also be said that the DRMP/EIS does not consider the *cumulative* impact of all these individually "insignificant" actions. 66-7

6. **Summary of Social and Economic Impacts.** A summary of social and economic impacts by alternative is not presented in Table S B. 66-8

7. **Public Contacts.** Please provide a listing of all DRMP/EIS-related government and public contacts that occurred in Nye County and a brief description of the nature of the contact. 66-9

SPECIFIC COMMENTS

66-10 Page 2-52: Soil and Water Resources. Please describe the process and federal law and regulations by which the BLM asserts public reserves to meet administrative water needs.

66-11 Page 3-3: Visual Resource Management (VRM). The DRMP/EIS does not provide a map of existing VRM classes in the resource area. Therefore, comparison with other alternatives is precluded.

66-12 Pages 3-7 & 8: Table 3-C: Summary of Stream Habitat. Please identify the source of the information contained in this table. Are any of these streams intermittent or ephemeral streams?

66-13 Pages 3-3 & 4: Wildlife Habitat. The DRMP/EIS states "...heavy use of important browse species by livestock have contributed to the deterioration of some winter range." What is the source of the information on which this statement is based? Where is the deteriorated range located?

66-14 Pages 3-18 to 3-21: Recreation. The estimate of current participation in dispersed recreation activities contained in Table 3 F is derived in part from data that was compiled in 1983. Since that time, Nye County population has grown by over 100 percent and the demographic characteristics of the population within the Tonopah Resource Area has also changed. Consequently, the 1983 data is dated and not representative of the percentage of the population participating in dispersed recreation activities. Also, we strongly disagree with the implicit assumption inherent in the table that all recreation use comes from Nye and Esmeralda County residents. It is clear that an ever-increasing number of recreation resource users come from Reno, Las Vegas, and California. We suggest that the BLM conduct surveys of recreation users to establish more realistic participation rates.

Pages 3-25 to 3-30: Social and Economic Conditions. Since 1986, Nye County has conducted an extensive socioeconomic monitoring and analysis effort to fulfill its oversight responsibilities under the Nuclear Waste Policy Act (NWPA) of 1982, as amended. Consequently, Nye County has a great deal of current socioeconomic data that would have enhanced the BLM's analysis of this topic in the DRMP/EIS. Esmeralda County also has socioeconomic data developed in response to NWPA. This is but one of the many examples in which a coordinated planning process as envisioned by FLPMA (which is discussed in our procedural comments) would benefit the BLM, as well as Nye County and its residents. Most of the economic data contained in the DRMP/EIS is from the 1989/1990 period and is taken from secondary sources compiled at the state and federal level. For example, in the Tonopah Resource Area since 1990, the 37th Tactical Fighter Wing has been relocated from the Tonopah Test Range and several mines have ceased or scaled-down operations. These events have resulted in an increased importance of those sectors of the economy that rely on resources on BLM land (mining, ranching, and recreation).

66-15
- A discussion about the driving forces in population growth and change in the Tonopah Resource Area and about how those forces are linked to the resources in the Resource Area would be useful in this section. Also, Nye County has an official process to monitor and project population. As of the second quarter of 1993, Nye County's population monitoring system (which is based on the 1990 census and quarterly changes in utility hook-ups) estimated Nye County population at 21,502, which means that *current* population is 5 percent higher than the *1995* projection used in the DRMP/EIS. Nye County's most recent run of its population model projected 1995 population at 25,976, which is 21 percent higher than the 1995 projection used in the DRMP/EIS. Nye County has spent considerable time and effort developing a population monitoring and projection capability. Nye County's figures are more appropriate numbers to use for Nye County population than the estimates and projections contained in Table 3 L. Nye County also has sub-area economic and population estimates which could be useful for analyzing economies and populations in the Tonopah Resource Area.

66-16
- The income and employment discussion on page 3-25 is misleading. The income and employment figures contained in this section are derived from U.S. Department of Commerce, Bureau of Economic Analysis, Regional Economic Information System (BEA) estimates. BEA estimates for employment and income are by *place of work*. In Nye County, many employees work at the Nevada Test Site (NTS) but commute daily by bus from Clark County, providing

no economic benefit to the County. Estimates developed by Nye County for employment by *place of residence* place the 1989 service sector level at 2,492 workers as opposed to the BEA estimates used in the DRMP/EIS for 1989 Nye County service sector employment of 7,571. These and other adjustments bring total 1989 Nye County employment by place of residence to 9,077, which is contrasted to the BEA estimates for 1989 Nye County total employment of 13,204. Using BEA estimates without an explanation of the data overstates employment and distorts the economy in Nye County. Additionally, the use of point-in-time data overlooks the fact that service employment has been declining in recent years.

66-17
- It would be useful to focus the discussion of the Nye County economy contained in this section on the relationship between the various sectors in the economy and the resources in the Tonopah Resource Area. It would also be useful to show how these data have changed over time relative to activities involving resources in the resource area. For example, what is the relationship to resident service and retail employment and changes in mining sector employment? In agricultural employment?

66-18
- The discussion of unemployment rates on page 3-28 would also benefit from a broader historical perspective. For example, in 1992 Nye County the average unemployment rate (6.95) was higher than the statewide average (6.56). Recent Nye County unemployment rates were as high as 11.5 percent (June 1993 seasonally-adjusted rate) reflecting closures and layoffs at area mines as well as layoffs at NTS.

66-19
- The data used for the Social Setting, Attitudes and Values Section is over 12 years old. During that time, Nye County population has more than doubled and issues associated with mining, grazing, and other uses of public lands have evolved substantially. It would be useful here to provide current data on the attitudes and values of Tonopah Resource Area residents toward public land resources and the proposed change in use of those federal resources, which are being considered both at the national and resource area levels.

66-20
- The discussion of per capita income contained on page 3-27 would benefit from historical data rather than the one-point-in-time 1989 estimate. For example, Nye County per capita income has been falling since 1989.

66-21
- On page 3-27, the DRMP/EIS incorrectly states that federal land ownership within Nye County amounts to almost 74 percent of the total. In fact, federal land within Nye County amounts to almost 93 percent of the total land area within the County.

66-22
- On page 3-28, under Affected Sectors, Agriculture, the DRMP/EIS asserts that "...Little indirect income is generated by agricultural purchases within either of the counties." While it is true that most farm implements are purchased outside of the counties, these purchases occur in Reno and Las Vegas, as well as in Bishop. This statement also ignores the other kinds of indirect income generated by the ranching industry. Local purchases of groceries, restaurants, hardware items, services, and equipment repair are an important part of the economies of the communities of Round Mountain and Tonopah in Nye County. Additionally, the taxes paid by the ranching industry support local government and school employment, which in turn generate jobs and additional indirect spending.

66-23 • The statement on page 3-28 that "...Net ranch income is estimated at $5.25 per AUM," is not tied to a particular year nor supported by reference or an explanation of methods. Nye County sources indicate that net ranch income from grazing on public lands has been as low as $1 in recent years.

66-24 • The discussion of the economic benefits associated with the use of the public range land is misleading in that it does not recognize recent events and the erosion of the value of grazing permits. The provisions of *"Rangeland Reform '94"* and other measures that may be enacted by the Department of the Interior (DOI) or Congress may substantially alter the value of grazing permits. The uncertainty surrounding the changes in grazing fees and regulations has had a direct effect on the value of grazing permits. These effects should be discussed in the DRMP/EIS. BLM should also consider delaying issuance of the RMP/EIS until these issues are resolved by DOI or Congress to avoid substantial revisions.

66-25 • The discussion of mining on page 3-29 states that "...Mining is the second largest income-producing activity in Nye County." This statement is based on the use of BEA income data. As described above, the BEA data includes service sector jobs held by Clark County residents. Service sector income includes services such as auto mechanics and dry cleaners, and business services such as are provided by contractors at the Nevada Test Site and Tonopah Test Range. In terms of income for Nye County residents, mining is the largest revenue-producing industry. Similarly, Nye County's tax base is heavily dependent on revenues from the mining sector. The DRMP/EIS should contain a broader discussion of the relationship between mining and local government fiscal conditions. The DRMP/EIS should also discuss the effect recent and anticipated changes in the regulations governing mineral exploration and development on public lands could have on Nye County fiscal conditions.

66-26 • On pages 3-29 and 3-30 under the discussion titled "Recreation," to the list of "...Public land resources associated with recreation and affected by this plan..." we would add lands available for off-highway vehicle (OHV) use. On page 3-19 the DRMP/EIS states "...The primary recreation activity is OHV use." Therefore, it seems only logical to include lands available for OHV use as a land resource associated with recreation. Also, the methods or sources for the "expenditures deriving from recreation activities" and the associated income and job estimates are not provided.

66-27 This section also contains the statement "...While public lands recreation activities do contribute, in some measure, to the local economy, any potential gains or losses would not be of sufficient magnitude to have any significant impact. Recreation expenditures will not, therefore, be considered further in the impact analysis. Neither OHV designations, nor adjustments in wildlife populations will produce a measurable difference...." These statements are unsupported by analysis in the DRMP/EIS. As discussed above, the methods for estimating recreation activity participation are based on dated studies. There are no projections of future participation in resource-based activities contained in the analysis. It would seem that the analysis should provide twenty-year projections of resource-based recreation activities and establish the economic effects of such activities before the assertion can be made that potential gains or losses would be insignificant.

Page 4-17: <u>Impacts Alternative 1. Impacts to Economic Conditions from livestock grazing management</u>:

66-28 • This section states "...No changes in the administration of grazing on public lands would be introduced." This statement ignores the current *Rangeland Reform '94* initiative of the DOI and the grazing reform bills that are before both houses of Congress. It is very likely that 1994 will see sweeping changes in the administration of grazing on public lands. To ignore these imminent changes does a disservice to Nye County and its residents and renders the DRMP/EIS both incomplete and inaccurate.

66-29 • Does the initial stocking level of 162,766 reflect some voluntary, temporary reductions in stocking levels? If so, would it not be more accurate to reflect the permitted stocking level?

66-30 • This section does not address the effects of current grazing allotment evaluation practices. The Allotment Categorization Table presented in Appendix 8 indicates there is no grazing allotment in the Tonopah Resource Area that is in satisfactory condition. It has been the BLM's recent practice to recommend reductions in animal unit months (AUMs) for allotments that are in unsatisfactory condition. In some cases, Nye County ranchers have stated that they cannot remain in operation with reductions in AUMs. Has the BLM analyzed the effects of reductions in AUMs for all grazing allotments listed as having unsatisfactory conditions?

66-31 • This section also states that "...No significant economic impacts to the livestock grazing industry or to local economies is expected." Based on the absence of the analysis identified above and the absence of the analysis of proposed changes in grazing fees and regulations, Nye County believes that this statement cannot be supported.

66-32 Page 4-83: <u>Impacts Alternative 4. Impacts to the Lands and Rights-of-Way Programs from Lands and Rights-of-Way</u>: Nye County questions the logic in denying disposal of 3,840 acre agricultural entry application because of "the negative effects of low level, high speed flights on human beings and animals." This area is less than three miles from the administrative and operational facilities of the Tonopah Test Range, where thousands of people have worked on a daily basis for many years. Would a rejection of this application be supportable based on those circumstances?

66-33 <u>Appendix 5</u>. Please provide a description of the methods used to develop the Proposed Range Improvement Projects identified in this table.

66-34 <u>Appendix 6</u>. Do the initial stocking levels for livestock listed in this table reflect voluntary temporary reductions by the permittee or do they reflect permitted levels?

66-35 <u>Appendix 8</u>. The Range Condition column in this Allotment Categorization table shows that no allotment in the Tonopah Resource Area has range that is in satisfactory condition. Please provide a complete description of the categories for this table and the methods for evaluating and categorizing allotments. Have these categorizations been communicated to the permittees? Some permittees have stated that BLM representatives have told them that range conditions on their allotments are good. Are these statements contradictory?

We would reiterate that these comments represent only a partial review of the Tonopah DRMP/EIS. Given additional time, Nye County could interact with Nye County residents and Tonopah Resource Area stakeholders, conduct a more thorough review, and provide additional comments which, we believe, would result in a better RMP/EIS.

Sincerely,

NYE COUNTY BOARD OF COMMISSIONERS

Cameron McRae, Chairman

Richard Carver, Vice Chairman

Red Copas, Member

Dave Hannigan, Member

Joe Maslach, Member

Attachments

cc: The Honorable Richard H. Bryan, United States Senator w/o Exhibit
The Honorable Harry Reid, United States Senator w/o Exhibit
The Honorable Barbara Vucanovich, United States Representative w/o Exhibit
The Honorable James H. Bilbray, United States Representative w/o Exhibit
The Honorable Frankie Sue Del Papa, Nevada State Attorney General w/o Exhibit
The Honorable Mike McGinnis, Nevada State Senator w/o Exhibit
The Honorable Roy Neighbors, Nevada State Assemblyman w/o Exhibit
The Honorable Bruce Babbit, Secretary of the Interior w/ Exhibit
Mr. Jim Baca, Director, Bureau of Land Management w/ Exhibit
Mr. Billy R. Templeton, Nevada State Director, Bureau of Land Management w/ Exhibit
Mr. Jim Currivan, District Manager, BLM Battle Mountain District Office w/ Exhibit

67

NYE COUNTY

September 30, 1993

Mr. Ted Angle
Tonopah Resource Area Manager
Bureau of Land Management
P.O. Box 911
Tonopah, Nevada 89049

RE: Nye County Board of Commissioners' Comments of Procedural Aspects of the Draft Tonopah Resource Management Plan and Environmental Impact Statement Process

Dear Mr. Angle:

This letter provides the Nye County Board of Commissioners' comments on procedural aspects of the June 1993 draft of the Tonopah Resource Management Plan and Environmental Impact Statement (DRMP/EIS). Because of the number and complexity of the issues involved, Nye County will provide comments on the substance of the draft under separate cover.

Based on our preliminary review of the draft and our understanding of both the *Federal Land Policy and Management Act of 1976* (FLPMA) and the *National Environmental Policy Act of 1969* (NEPA), we formally request the following actions:

- that the draft Tonopah Resource Management Plan and Environmental Impact Statement be remanded to the BLM interdisciplinary team for further evaluation and public comment; and,
- that the BLM allow Nye County to participate in a meaningful, coordinated land and resource use planning effort as is envisioned by the spirit and the letter of FLPMA.

The remainder of this document provides Nye County's reasoning for these requests.

67-1 1. Title II, Section 202 (c)(9) of FLPMA directs the Secretary of the Department of Interior to "coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located." Despite a formal request from Nye County for participation in land and resource planning

activities, real coordination in the spirit of FLPMA did not occur during the Tonopah RMP/EIS process.

On February 5, 1992, the Nye County Board of Commissioners sent a memorandum to a number of BLM officials, including the Tonopah Area Manager, the BLM Battle Mountain District Manager, the BLM Nevada State Director, the Director of the BLM, and the Secretary of the Interior, notifying each of these officials of Nye County's desire to participate in the federal land use planning efforts (see Exhibit A). Yet Nye County officials and staff were merely notified of public review and comment opportunities in the Tonopah RMP process. No meaningful attempt at coordinated BLM/Nye County land use and resource planning has occurred.

2. Chapter V Section B(1)(g) *(Identify Cooperating Agencies)* of the BLM's NEPA Handbook says that, "The BLM, as lead agency, is responsible for establishing liaison with all Federal, State, local and Tribal agencies that have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed action and for requesting their participation as a cooperating agency on an EIS as appropriate..." The Handbook continues, "Before proceeding past the scoping process, the BLM official responsible for preparing the EIS should determine if work with any cooperating agencies is covered by an existing memorandum of understanding (MOU) or interagency agreement (IA). If it is, the MOU or IA should be followed or modified as necessary." Nye County was not asked to be a cooperating agency or allowed meaningful participation in the NEPA process, despite an existing MOU between the Nye County Board of Commissioners and the BLM Battle Mountain District and other districts (see Exhibit B).

Provision I (A.) of this MOU, dated August 13, 1981, states that each party will "...Cooperate in land use decision making, including consultation in land use decisions and in preparation of land use plans, including for example, County master plans and BLM resource management plans."

Provision II. (B.) of this MOU states that the BLM will "...Solicit County participation in developing plans, programs, and proposals for management of public lands and consider those views in the decision process. Participation will include analysis of management possibilities and the development of environmental alternatives, and the County shall retain the right to receive notice of and to participate in such planning procedures as are provided by Section 202 (f) of the Federal Land Policy and Management Act of 1976."

Nye County was not afforded the opportunity to participate in the analysis of land management opportunities or the development of environmental alternatives.

67-2

3. Section 1506.2 (d) of the *Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA* (40 CFR) requires the lead agency to "discuss any inconsistency of a proposed action with any approved State or local plan or laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law." The Draft Tonopah RMP neither mentions Nye County's plan nor does it attempt to reconcile the several inconsistencies with this plan.

Nye County has a Policy Plan for Public Lands, which was approved by the Nye County Board of Commissioners on April 3, 1985. Several of the provisions of the RMP appear to be in conflict with this plan. The BLM is specifically directed to discuss any inconsistencies and describe the extent to which the agency would reconcile its proposed action with the plan or law.

4. The Draft Tonopah RMP and EIS did not fully address cumulative impacts.

There are at least three areas in which the draft inadequately addresses potential cumulative impacts.

67-3

- The 1987 Amendments to the Nuclear Waste Policy Act (NWPA) designated Yucca Mountain as the sole candidate site to be studied for the potential location of the nation's first (and possibly only) high level nuclear waste repository. Although Yucca Mountain is located in southern Nye County, within the BLM Stateline Resource Area, two of the three rail access routes that are currently being considered for transportation of nuclear waste to Yucca Mountain would cross lands located within the Tonopah Resource Area. Under current schedules and if the site is found suitable for a repository, a rail line could be constructed within the next 20 years. Consequently, the Nye County Board of Commissioners believes that the Yucca Mountain rail route alternatives are "reasonable foreseeable future actions" as defined in 40 CFR 1508.7. Although the U.S. Department of Energy will be required to assess the environmental impacts of a rail spur under NEPA, it is necessary that BLM consider the potential development of a rail spur as a cumulative impact, and it would also be important for the BLM to consider the effects of the proposed rail routes on other resources as it conducts resource planning efforts.

  Nye County, under its statutory NWPA authority and responsibility has accumulated considerable data and conducted numerous analyses of the repository and ancillary transportation routes that could be useful in the cumulative assessment portion of the Tonopah RMP and EIS process. This would seem to be another good reason for the coordination of land use, planning, and management activities envisioned by FLPMA and for the Nye County participation in the analysis of management possibilities and development of environmental alternatives envisioned by the 1981 Nye County/BLM MOU.

67-4

- According to the definition in 40 CFR 1508.7, "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." Multiple use of public lands in Nye County is continually being diminished by actions associated with resource management objectives for each alternative. An example is the current grazing allotment evaluation process. The Allotment Categorization Table presented in Appendix 8 indicates that there is no grazing allotment in the Tonopah range that is in satisfactory condition. It has been the BLM's recent practice to recommend substantial reductions in animal unit month's (AUMs) for allotments with unsatisfactory range conditions. In some cases, Nye County ranchers have stated that they can no longer stay in operation if substantial reductions in AUMs occur. Nye County considers these to be "collectively

significant" actions and believes that the Tonopah RMP and EIS are incomplete without an analysis of the potential cumulative effects of these and other policies and events described in the DRMP/EIS.

67-5

- The U.S. Department of the Interior has introduced *"Rangeland Reform '94: A Proposal to Improve Management of Rangeland Ecosystems and the Administration of Livestock Grazing on Public Lands"*. By increasing the current grazing fees by more than 200 percent and introducing a sweeping series of changes in grazing policy and regulations, the proposal, if implemented, would profoundly affect the ranching industry and impact the economy and social conditions in Nye County.

  The final form of grazing reform (and whether reform will be accomplished by the Administration or by Congress) is not known. It is almost certain that grazing reform will occur in 1994. To neglect to consider this eventuality as a cumulative impact denies the obvious and renders the DRMP/EIS inaccurate and incomplete.

5. The Draft Tonopah RMP and EIS does not in all cases identify assumptions or identify methodologies as required by 40 CFR paragraph 1502.24.

67-6

For example, the above-referenced Appendix 8 (Allotment Categorization) does not provide a description of the assumptions or methodologies used to arrive at the conclusions outlined in the table. There are numerous other examples of lack of documentation that will be submitted with Nye County's detailed comments.

6. Nye County believes that the BLM's process for soliciting public involvement and comment on the Tonopah RMP and EIS was flawed.

There are several reasons for this assertion:

67-7

- The draft document is extremely technical in nature and difficult to read. The Nye County planning department ran four randomly selected paragraphs of the draft through RightWriter", a commercial grammar and writing style evaluation program. All paragraphs analyzed by RightWriter" were rated "complex," which according to the program means "the writing is complex and may be difficult to read." The program rated the paragraphs in terms of years of education required to understand the writing. Understanding of the paragraphs required educational levels that ranged from 13.5 years to 15.7 years, according to RightWriter" criteria. It is likely that the complexity and technical nature of the document prevented some public comment.

- The 90-day period provided for public review of the draft occurred during July, August, and September, which is the busiest season for ranchers and miners who are two of the largest stakeholder groups for Tonopah Resource Area.

- A 3½-minute time limit was imposed on comments for the August 26 public review and comment meeting held in Tonopah. The format was not conducive to asking questions or for the illumination of issues by the BLM. The Nye County

Commissioners know from long experience that many Nye County residents are not comfortable with submitting written comments. Consequently, a substantial number of Nye County residents were precluded from their right to meaningful comment by the format and time limits imposed at the August 26 public meeting.

To help remedy this situation, Nye County held a public hearing on September 15, 1993, in the Commissioners' hearing room in Tonopah. Although the County was not able to advertise this hearing widely, a number of interested parties attended and provided comments on the Draft Tonopah RMP and EIS. Those comments were transcribed by a court reporter and are provided as an appendix to Nye County's comments on the substance of the DRMP/EIS.

67-8

- During a Nye County Board of Commissioners meeting on September 8, 1993, at which Ted Angle, BLM Tonopah Area Manager, and Hal Zabriskie, Resource Management Plan Team Leader, discussed the DRMP/EIS, Mr. Zabriskie stated that in all of the public meetings not one person spoke in support of Alternative 4, which is the BLM's preferred alternative. This indicates to Nye County that the BLM did not seek adequate public and agency involvement in the alternative formulation process.

In 1992, Nye County began the development of a county-wide comprehensive plan that will include a public lands element. Nye County circulated a copy of an early draft to the BLM for review and comment. In a letter dated February 23, 1993, the BLM Battle Mountain District Manager provided comments on Nye County's draft plan. The letter stated, "We desire to see Nye County produce a plan which is easily understood, deals with the issues which are relevant to a majority of the residents of Nye County, and which is consistent with federal laws." The letter also stated "...Please contact the [Tonopah Area Manager] should you have any questions regarding the content of this letter, or wish to formulate a working group to address federal lands issues further." As a result of these and other comments on the public lands portion of the Draft Nye County Comprehensive Plan, Nye County removed the public lands element from the Comprehensive Plan and began a separate process. We have selected a contractor and we are beginning to seek input from Nye County residents, public lands stakeholders, and federal land management agencies.

The Nye County Board of Commissioners would like to see the BLM pursue a similar course of action. Nye County desires to see a Tonopah Area RMP/EIS that is "easily understood, deals with issues that are relevant to the majority of the residents of Nye County and is consistent with federal laws."

The above reasons form the basis for Nye County's request to remand the Tonopah DRMP/EIS to the BLM interdisciplinary team for further evaluation and public comment, and to allow Nye County to participate in a meaningful, coordinated land and resource use planning effort as is envisioned by FLPMA.

President Clinton and his Administration have given great attention to the notion of "reinventing government." We believe that Nye County and the Tonopah Resource Area of the BLM

have a unique opportunity to implement this challenge with a coordinated resource planning effort as envisioned in FLPMA.

We look forward to your response to our request at your earliest convenience.

Sincerely,

NYE COUNTY BOARD OF COMMISSIONERS

Cameron McRae, Chairman

Richard Carver, Vice Chairman

Red Copass, Member

Dave Hannigan, Member

Joe Maslach, Member

Attachments

cc: The Honorable Richard H. Bryan, United States Senator
The Honorable Harry Reid, United States Senator
The Honorable Barbara Vucanovich, United States Representative
The Honorable James H. Bilbray, United States Representative
The Honorable Frankie Sue Del Papa, Nevada State Attorney General
The Honorable Mike McGinnis, Nevada State Senator
The Honorable Roy Neighbors, Nevada State Assemblyman
The Honorable Bruce Babbit, Secretary of the Interior
Mr. Jim Baca, Director, Bureau of Land Management
Mr. Billy R. Templeton, Nevada State Director, Bureau of Land Management
Mr. Jim Currivan, District Manager, BLM Battle Mountain District Office

68

NYE COUNTY PUBLIC MEETING - transcribed record (excerpts from original letter)

68-1 Page 7 - (Del Haas) "And yet, on Page A-16 of the Tonopah RMP, it states that the present management of RO Livestock's specific allotments is unsatisfactory."

68-2 Page 27 - (Bill Kohlmoos) Now, although the date on the first page is June 4th, 1993, supposedly when this was issued, very few people were privileged to see a copy or even be aware of its existence until the past two weeks. It was not presented properly to the public.

68-3 Page 29 - (Bill Kohlmoos) There were many complaints that the maps were of poor quality and concealed many things and that there were no maps of land status, water rights or roads, the three most important items.

68-4 Page 31 - (Bill Kohlmoos) On Page 2-7 of the plan under "Watershed," they say -- and this is quoting -- "Initiate water control measures on seventeen areas." They don't say what areas.

68-5 Page 55 - (Richard Carver) "In addition to BLM's coordinated regulations, BLM regulations also require consistency between federal land use plans and local plans. BLM regulations require BLM plans to be consistent with local community (inaudible) plans.

68-6 Page 81 - (Joe Fallini) I'd like to know where one hundred and forty miles of fence would go on our outfit and I can't find it in this EIS.

69

NYE COUNTY

TO: Bureau of Land Management, Tonopah Resource Area Manager

DATE: September 26, 1993

SUBJECT: RMP Comments

Dear Sir:

I am a Nye County Commissioner representing District One. I have lived in Smoky Valley my entire life where I am a second generation rancher. My ranch does not have any dependency on public lands for grazing, nor do I have any mining claims on public lands today. Therefore, I have no conflicts of interest. I am writing only as a commissioner, and those views may or may not be those of the Board of Nye County Commissioners.

I have to ask that this RMP/EIS be remanded for redraft because of the statement the BLM Area Manager made to the Nye County Commissioners after all the public hearings were held. He reported that, "Out of the four public hearings, not one person testified in support of the BLM Preferred Alternative." This alone justifies a remand for redraft.

I am requesting that the Tonopah Resource Management Plan and Environmental Impact Statement be remanded and redrafted in a cooperative effort with Nye County Commissioners as required by Federal Regulations.

I am not going to comment on specific items, but will comment on the overall document and will bring out the justification to have it remanded. I will reserve, as a county commissioner, the right to submit additional comments after October 1, 1993.

This plan lacks in describing affected environments of water and public access, both being very essential to human survival in desert environment. The plan also lacks in describing the effects this plan will have on private property rights. The evidence is clear, that the new management plan wants to seize control over water rights, access and range improvements. These are in fact property rights recognized by Nye County and I intend to do everything possible to protect these rights.

69-1 This EIS does not mention any inconsistencies the BLM plan has with the Nye County land use plan, as required by law. Nye County was not given a review time to notify BLM of the inconsistencies so the BLM could incorporate them into the EIS.

I am very supportive of a coordinated land use planning effort involving the BLM and Nye County on Federal lands that have been ceded to the United States by the Nevada State Legislature. But on public lands that Nevada owns, Nye County should be responsible for their management.

COUNTY OF NYE • P.O. BOX 153 • TONOPAH, NEVADA 89049 • (702) 482 8191

With that in mind, I will now show my opposition to several areas, whereby requesting this plan be remanded.

Opposition to time allowed for public comment.

69-2 This above mentioned process is expected, by the BLM, to provide management guidance over the next 20 years. The BLM allowed three and one half (3½) minutes for oral comments at the Tonopah meeting on August 26, 1993, and only 90 days for written comments.

It is interesting to note that it took 17 BLM employees (Table 6A) from February 1990, or before, until June 1993 to prepare the above mentioned plan. This also included 29 BLM employees that reviewed the plan, many who only reviewed specific areas, (Table 6B). There is not any mention of Nye County help in preparing or reviewing.

Opposition to the Level of Comprehension of the Plan and Process

69-3 According to a computer program that Nye County performed with the draft plan, it is written at a 14th grade level.

I believe that a land use plan that affects each and every person in Nye County, should be developed and written so the average person can easily comprehend the material, that being a sixth to eighth grade level.

Opposition to a Twenty Year Plan

In 1989, BLM did an evaluation of the 1981 Tonopah MFP and the 1986 Esmeralda-Southern Nye RMP. "It became evident that a combination of expanding resource development and changes in management direction had rendered the documents inadaquate for long-term management guidance of many resources." (Page 1-1) These plans of less than ten years were outdated so now BLM wants a twenty year plan? The only benefit I see in a twenty year plan is for those with a hidden agenda. A five year plan would be in the best interest of the public welfare, therefore, that is what I recommend.

Opposition to Resource Area not containing all of Nye County

Currently, Nye County has to work with four BLM Districts and six BLM resource management areas, each having its own resource management plan. Each existing plan is inconsistent with the Nye County land use plan. None of the BLM area plans were coordinated with Nye County nor has BLM taken any measures to resolve any conflict. So why develop another plan that does not follow 43 CFR 1600 regulations. With the limited staff in Nye County, it is impossible to work through the process in so many

different plans.

Before the development of a resource plan, the resource area should be changed to include all of Nye County.

69-4 The BLM claims in this document, that "it has been coordinated with existing land-use plans of adjoining areas to ensure consistency to the extent possible." I believe this to be wrong and I request that documentation showing coordination and consistency of other land-use plans be provided so a reviewer can read it for comparison.

Opposition to not including all program-specific determinations

Listed below are four existing environmental impact statements covering actions in the resource area that should have been included with the draft plan so a reviewer could have a clear understanding of all the issues involved.

Tonopah Livestock Grazing EIS

Esmeralda - Southern Nye RMP/EIS

Tonopah Wilderness Recommendation Final EIS

Esmeralda - Southern Nye Wilderness Final EIS

Therefore, with these documents included, I request this be remanded.

Opposition to maps

69-5 First, the maps are not large enough for a good interpretation, and there is no way to compare them.

Needed are exact land status maps of the following:

Private property rights map
Private lands
Water map
Water permit map--one surface and one underground
Patented mining claim map
Unpatented mining claim map
Access map
County, State and Federal road map
BLM road map

Without the above maps, I cannot make a fair and complete evaluation of the plan.

Therefore, I request the plan be remanded to include the maps listed and use better defined maps.

Opposition to data provided in tables

69-6 Here is an example of a table lacking complete and accurate information. Table 3c lists three creeks in Smoky Valley, I know that there are about twenty creeks in Smoky Valley that drain onto public lands.

69-7 Another example is Table 3D--Wild Horse and Burro census data. There is no mention of the 1971 horse populations or 1971 herd management areas. The Nye County plan requires "Wild horse and burro populations and herd use areas be based on statistics gathered when the Wild Horse and Burro Act was passed (1971)."

Comments I have received over the past several weeks and the life time knowledge I have about the wild horse issue, I want to see the documentation of how the BLM arrived at the figures in Table 3D. I believe them to be totally inaccurate.

69-8 Table 3L - Population. The BLM 1995 preliminary forecast for Nye County is a population of 20,400. A Nye County Nuclear Waste Repository Project Office letter of Sept. 20, 1993, to Commissioner Richard Carver, estimated Nye County was home to 21,502 people as of the end of June, 1993. The was down 62 persons from the end of the previous quarter.

Because of the Repository Project office, Nye County has a myriad of statistical information. Had the BLM coordinated with Nye County, accurate information would have been used. Therefore, I request the plan be remanded to incorporate accurate Nye County data.

Opposition to information used in Appendix tables

69-9 Most of the appendix tables are hard to understand, lacking information, perhaps misleading or are of value to BLM personnel only.

An example is Proposed Range Improvement Projects-Smoky. Why would the BLM propose to build 52 miles of fence with only two cattle guards and only one water development for only 4308 AUMs? How cost effective is this? All this would do is cause heavy utilization in certain areas. There is no justification for this project.

69-10 Another example is Allotment Categorization, where there are 34 allotments listed. Not one allotment is categorized as SAT. Twenty two of these allotments are listed as present management

being UNSAT. It is hard for me to believe that third and fourth generation ranchers out there are such bad managers that their ranges are in unsatisfactory condition. All this indicates to me is that the BLM is not doing its job as public land use managers. The BLM has been managing this land since the late 1940's in this county and if in over 40 years conditions are unsatisfactory, then we need a change in management. We need management that is responsive to the people of Nye County and that can only be the Nye County Commissioners.

Therefore, I again request the plan be remanded.

Opposition to document not having a complete analysis of the custom and culture of Nye County and the effects on our county's economic stability.

The livestock and mineral industries are the mainstay to the economic stability of Nye County. The process completely ignored the economic impacts that different alternatives have on Nye County, which make the document incomplete and must be remanded to be redrafted.

Objection to BLM not following federal regulation, Memoradum of Understanding

The BLM did not follow federal regulations.

69-11 Nye County does have a land use plan, dated 4/3/85, (encl.) did notify the BLM, by letter, dated 2/5/92, (encl.) of the county's desire to participate in land use planning and has a signed Memorandum of Understanding, dated 8/13/81, (encl.) with the BLM. BLM did not coordinate with Nye County in the process and this necessitates the plan be remanded and the process started over with Nye County having voice in our destiny.

Objection to BLM's assumption that they have jurisdiction on public lands within Nye County

I asked the area manager in a Nye County Commission meeting to provide me the documentation that provides the federal ownership of the land. I have not received an answer to my question.

My research and knowledge of this subject raises the question as to why Nye County is not managing the public lands within its borders. The tenth amendment to the Constitution states that "Powers not delegated to the United States by the Constitution nor provided by it to the states, are reserved to the states respectively, or to the people."

I testified before the Nevada Assembly Judiciary Committee on March 25, 1993, from the report of the Interdepartmental

Committee for the Study of Jurisdiction over Federal Areas within the States, dated April 1956, and submitted to Attorney Herbert Brownell, Jr. and transmitted to President Eisenhower. "It is a well settled matter of law that on those lands held by the federal government pursuant to Article 1, Section 8, Clause 17, of the U.S. Constitution, the United States has the undisputed power to exercise both jurisdiction and authority. It is equally clear that on those lands held by the federal government...where the state has not yielded sovereignty...jurisdiction and authority remain with the state."

Pollards Lessee v. Hagan, 44 U.S. (3 How) 112. 11 L. Ed. 565 (1845) discusses the agreement by the legislatures of territories seeking admission into the Union, that they disclaim all right and title to the unappropriated lands lying within their respective territories. (Sec. 4 of the Nevada Admission Act [1864], found in Volume 29 of the Nevada Revised Statutes, contains such a provision). It states that such an agreement, in combination with the Property Clause of the U. S. Constitution (Art. 4, Section 3, Clause 2) which reads that Congress is given the power to make all needful rules and regulations respecting the territory or other property belonging to the United States, results merely in the federal government having the right to pass laws protecting public lands from taxation and providing for their sale.

Dred Scott v. Stanford, 60 U. S. (19 How.) 393, 15 L. Ed. 691 (1856), said Court discussed the reasons for insertion of the Property Clause in the Constitution. The federal government was to be one of carefully limited powers, and it had no grant of authority to receive and administer the unappropriated lands and other properties, such as military equipment and supplies, which the thirteen original sovereign states wished to cede to it for the common good. The raising of money to pay the public debt by selling the lands was the main object of the cessions. The Property Clause provided the United States government with the power to take possession of the properties and protect them, so that they could be disposed of in an orderly fashion. "It applies only to the property which the States held in common at that time, and has no reference whatever to any territory or other property which the new sovereignty might afterwards itself acquire."

United States v. Gratiot, 39 U.S. (14 Pet.) 526, 10 L. Ed. 573 (1840), which declares that the limitations on what the federal government can do with its property, by reason of the origin of the Property Clause, apply only to lands within the original thirteen states; there are no such limitation on territory subsequently acquired by the federal government by treaty or

conquest.

In 1787, Congress specified that new States shall be admitted into the Union "...on an equal footing with the original states in all in all respects whatever." This doctrine applies only to political rights and sovereignty; supreme power, freedom from outside control.

St. Louis-San Francisco Ry. v. Satterfield, supra. The legislature of a state has unlimited power to transfer jurisdiction to the United States except as it may be restricted by State or Federal constitutions." The federal government cannot, by unilateral action on its part, acquire legislative jurisdiction over an area within the exterior boundaries of a state. Article 1, Section 8, Clause 17, of the Constitution, provides that legislative jurisdiction may be transferred pursuant to its terms only with the consent of the legislature of the state in which is located the area subject to the jurisdictional transfer.

The consent requirement of Article 1, Section 8, Clause 17, was intended by the framers of the Constitution to preserve the states' jurisdictional integrity against Federal encroachment. Eisenhower Report, Part II, Page 46, 47.

In researching the Nevada State Constitutional Provisions and Status of General Effect Relating to the Acquisition of Legislative Jurisdiction by the United States, no where do I find that the United States Dept. of Interior, BLM, purchased any public land or that the Nevada Legislature ceded any jurisdiction over public land to the United States Dept. of Interior, BLM.

Therefore, the evidence is clear that the jurisdiction and management of the natural resources on the public lands within the borders of Nevada, belong to the State of Nevada. The United States federal government only has jurisdiction on property it purchased and which has been ceded to the federal government by the Nevada Legislature.

In Nye County, the only property that has been ceded to the U. S. Federal Government is the land required by the Department of Defense and the post office in Tonopah. There is no property that has been ceded to the U. S. Federal Government in Esmeralda County.

I am still researching, trying to find what property the United States Federal Government purchased in Nye County from the State of Nevada. Maybe there is debt here that has never been paid. Therefore, I request that the answer to the question of PARAMOUNT TITLE be included in the Environmental Impact Statement.

As a Nye County Commissioner, I hereby demand that the draft Tonopah Resource Management Plan and Environmental Impact Statement be remanded and developed in coordinated effort between Nye County and the BLM on lands that have been purchsed by the United States Government and jurisdiction ceded to the United States government by the Nevada Legislature pursuant to Article 1, Section 8, Clause 17 of the United States Constitution. Further more, I also demand that no further action be taken until the Rangeland Reform 94 is finalized, as page eight of that document states, "Some BLM land use plans may require amendment to incorporate national Standards and Guidelines, and reflect consistency with new rules and regulations."

I took the oath of office to uphold the Constitution of the United States and the Constitution of the State of Nevada. I have no choice in the matter as many Nye County citizens oppose the BLM action. I further request that this complete comment be made part of the official record and be attached to the final Tonopah Resource Management Plan and Environmental Impact Statement.

Thank you.

Richard L. Carver

Richard L. Carver
Vice Chairman
Nye County Commission

Encl: Memorandum of Understanding
Nye County Policy Plan for Public Lands
Notification of Desire to Participate

CC: Secretary of Interior, Bruce Babbitt
U. S. Senator, Harry Reid
U. S. Senator, Richard Bryan
U. S. Representative Barbara Vucanovich
U. S. Representative James Bilbray
Honorable Governor of the State of Nevada, Bob Miller
Honorable Attorney General, State of Nevada, F. S. Del Papa
National Director, BLM, Jim Baca
State Director, BLM, Billy Templeton
District Director, BLM, James Currivan
Legislative Counsel Bureau Director, John Crossley
Nevada Dept. of Agriculture, Tom Ballow
Nevada Dept. of Minerals, Russ Fields
Nevada Dept. of National Resources, Pete Morros
Division of State Lands, Pam Wilcox
Nye County Commissioners
Esmeralda County Commissioners
Tonopah Times and Goldfield News, Hank Beals
Death Valley Gateway Gazette
Nevada Farm Bureau
Nevada Cattleman's Association
Nevada Mining Association
Nevada Miners and Prospectors Association
Mike McGinness, State Senator
Roy Neighbors, State Assemblyman

70

United States Department of the Interior

NATIONAL PARK SERVICE
Western Region
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

L7617(WR-RP)

24 SEP 1993

Memorandum

To: State Director, Bureau of Land Management (BLM), Nevada

From: Regional Director

Subject: **Tonopah Resource Management Plan (RMP)**, Bureau of Land Management (BLM), Draft Environmental Impact Statement, DES-93/0020

The National Park Service (NPS) has reviewed the subject Draft Tonapah Resource Management Plan/Environmental Impact Statement for potential impacts to Death Valley National Monument (DEVA).

General Comments

Adverse impacts to DEVA's ground water and scenic resources may result from mineral development in the Tonapah Resource Area. The BLM's preferred Alternative No. 4 could result in decreased protection of ground water and scenic resources of DEVA. By contrast, Alternative 3 provides DEVA and the proposed expansion area with equal or greater protection than the current management program. Based on factors relevant to DEVA, we recommend the adoption of Alternative 3.

Visual Resources

The no action alternative continues the decision in the Esmeralda-Southern Nye RMP (1986) to maintain the scenic quality of Nevada State Route 374 (Beatty to DEVA) and Nevada State Route 276 (Scotty's Junction to DEVA). The Esmeralda-Southern Nye RMP did not set visual resource management (VRM) classifications. The NPS considers maintenance of scenery to be at least Class II as defined in Appendix III. Alternative 3 is the only action alternative that maintains a Class II VRM classification for the two state routes from the Tonapah Resource Area into DEVA.

The preferred alternative lowers VRM goals for those two corridors and provides insignificant benefit to the mining and petroleum industry. On map 54, which shows classifications for fluid mineral resources potential, the 276 and 374 routes are in areas showing no fluid mineral potential. Locatable mineral potential is also low

(Map 62). The draft EIS implies that mineral development restrictions in areas of low potential do not significantly affect future production of that mineral. Proper resource management should not risk degradation of one resource when the benefits to another are insignificant.

Some of the area is of "unknown" potential and could later prove to be economic for mineral production. The VRM Class II designation does not prevent development in many cases. Development can occur provided "changes in any of the basic elements (form, line, color, texture) caused by a management activity [are] not evident in the characteristic landscape. A contrast may be seen but should not attract attention."

Development of sand and gravel pits along the highways into DEVA would not be likely. The visual impacts associated with large pits conflict with a Class II VRM requirement. However, mineral material resources are readily available in the area. Development of other equally economic sites is possible without the negative visual impacts on the travel corridors.

Ground Water Resources

The document's description of surface water resources is very weak and the document does not address ground water resources, ground water flow systems, and the impacts that the four management alternatives might have on ground water flow systems. Because surface water is not abundant in the Tonopah Resource Management Area (RMA), ground water flow systems are an important source of water.

The water discharged from springs and the base flow of perennial streams are derived from ground water flow systems. Withdrawing ground water near springs and perennial streams may reduce and/or eliminate the discharge rates of springs and streams, and adversely affect natural resources associated with the springs and streams.

Tonopah RMA includes parts of certain ground water flow systems which ultimately discharge water through springs in Death Valley National Monument (see Harrill and others, 1988, Sheet 2: Harrill, J.R., Gates, J.S., and J.M. Thomas, 1988, Major ground-water flow systems in the Great Basin region of Nevada, Utah, and adjacent states: U.S. Geological Survey Hydrologic Investigations Atlas HA-694-C, 2 sheets). Mining activities and exporting of ground water out of basins in the Tonopah RMA could withdraw large quantities of ground water and possibly reduce the discharge from regional springs in Death Valley National Monument, given that large withdrawals occur over a long period of time.

70-1 In a document of this type, presenting a discussion of impacts to the ground water flow systems is impossible without knowing the specifics of existing and proposed ground water development. Perhaps

some general statements could be made in the document, which outline a procedure or method to assess impacts caused by developments to ground water flow systems.

Natural springs play a vital role to DEVA's environment. The springs near Scotty's Castle near the north boundary are less than 3 miles from the Tonapah Resource Area. Certain types of mining and oil field development require large volumes of water. The only viable water source in the area is ground water aquifers. These are the same aquifers that may supply springs in DEVA. For these reasons, consumptive uses of ground water aquifers in the area concern the NPS.

70-2 Discussions of impacts to watershed from mineral exploration and development in Chapter 4 are essentially the same for each alternative. The document states, "[W]aters found in oil and/or gas producing formations are part of a closed system and will not impact the general ground water of the region." The meaning of "closed system" is unclear. If meant to be a general characteristic of oil and gas bearing formations, the statement is not accurate. If meant to be characteristic of the area, the document should plainly state that oil and gas bearing formations are not hydraulically connected to shallow aquifers or surface waters in the area. Also, shallow aquifers often supply large volumes of water for injection into oil zones for pressure maintenance or secondary recovery projects. Oil and gas operations can adversely affect ground water resources.

The Grapevine and Queer Mountain areas are now Wilderness Study Areas (Map 42). Congress may return these areas bordering DEVA to a multiple-use status. The preferred alternative opens them to oil and gas leasing under standard terms and conditions. The alternative also places minimal restrictions on mining activities. Management of these areas under the Interim Management Plan for Wilderness Study Areas provides adequate protection of ground water in DEVA. Alternative 3 maintains that level of protection. Alternatives 1, 2, and the preferred Alternative 4 may not.

If you have any questions, or if we can be of further assistance please contact Ron Replogle (415) 744-3968.

We appreciate the opportunity to review this document.

Stanley L. Albright

cc
Superintendent, Death Valley National Monument
WASO-774
REO/SFN

71

W. B. KOHLMOOS
P.O. Box 50300
Reno, Nevada 89513

September 27, 1993

Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada 89049

Subject: RMP COMMENTS

Dear Sir:

I have reviewed the draft of the Tonopah Resource Management Plan and Environmental Impact Statement. It is a very comprehensive and carefully prepared document which reflects the input of many hours of hard work and thought. However, I have certain objections which I would like to register with your office.

There are a number of references to the BLM's intention to acquire water rights, e.g. page 2-16, WILD HORSES AND BURROS, "3. The BLM will apply for appropriative water rights and/or will assert public water reserves on waters as they are identified or as they become available." It is my understanding that the water belongs to the State of Nevada and that private entities can obtain valid personal water rights from the State, and these are recognized as personal property. This practice should not be changed and the BLM should not possess any water rights whatsoever.

71-1 I object to the absence in the report of any maps of: 1) existing roads; 2) Valid water rights; and 3) land status. The maps which are included are almost illegible.

There are hundreds of dirt roads throughout the entire district, many of which were established more than 100 years ago. These roads are used daily by ranchers, farmers, miners, hunters, fishermen, outdoor enthusiasts, United Parcel Service, the telephone company, the county assessor, OSHA, EPA, USFS, BLM, US military, county sheriff, and scores of other individuals from all walks of life. Mention in the PLAN and EIS of withdrawals of [roadless?] areas for "Wildlife Management", Wilderness, or merely to "protect habitat", and other questionable uses, are contrary to multiple use policy and practice. These areas are being used at present. I object to any withdrawals.

I object to any acquisition or "taking" of private land. The BLM already controls 98% of the area. The BLM should respect property rights.

I object to the vague wording found throughout the Plan. Vague policy is a dangerous practice in that it invariably leads to a profusion of unnecessary and overly-restrictive rules and regulations which are never spelled out ahead of time, but are promulgated spontaneously by whomever may be so inclined. Although there is no reference to the word "policy", the plan is riddled with vague policy style statements.

71-2 I object to the limited time available for submission of comments. There was very little, if any, advance notice of the plan's release. Many property owners and residents received a copy as late as August or early September. I request that the period for comments be extended for another 12 months and that more public meetings be scheduled. Thank you.

Sincerely,

W. B. Kohlmoos

W. B. Kohlmoos

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RMP COMMENTS

NEVADA FARM BUREAU FEDERATION
NEVADA FARM BUREAU SERVICE COMPANY
1300 Marietta Way • Sparks • Nevada • 89431 • (702) 358-[illegible]
Call Toll Free in Nevada (800) 992-[illegible]

September 9, 1993

Ed Yslt
HCR 76 Box 910
Nyala Ranch
Tonopah, NV 89049

Dear Ed:

Enclosed are both the Nevada and American Farm Bureau policy books you requested.

I regret that I cannot participate in the September 15 meeting in Tonopah, however, I would like to know what transpires and how we as an organization can further assist the ranchers in the Tonopah Resource Management Area.

I am enclosing an extra set of policy books for Ron Williams, feeling that it would be more appropriate for you, a Farm Bureau member from Nye County, to share our policy than a direct, impersonal mailing from me.

Thank you for your call Ed, keep me updated.

Sincerely,

Barbara

Barbara Curti

A COPY OF THESE POLICY BOOKS CAN BE OBTAINED BY CALLING 1 800 992 1106

These books are part of my protest and objection where the Tonopah RMP POLICY conflicts with Farm Bureau Policy.

Ed Ysle

"RMP COMMENTS"

Written [illegible] to June 1993 Sept. 15,1993
Tonopah Resource Management Plan and
Environmental Impact Statetement

From Ed Ylst, HCR 76 B910, Tonopah, Nev. 89049 (702) 863-0232

The RMP does not meet the requirements of the Federal land Policy Act of 1976 nor the National Environmental Policy Act of 1976 for the following reasons:

~~[illegible]~~ THIS DOCUMENT NEEDS TO BE ATTACHED AT ITS CORE!

The entire document is based on false premisis,conspiracy to deprive American citizens of their constitutional rights of access, multiple use of public lands, basic fundamental property rights, due process, Nye county's right to economic growth, and completely ignores the sovereignty of the State of Nevada and violates several laws. (Under NRS: Taylor Grazing, Fence, Cultural and historical land use,1872 mining laws,Nye county input during planning,perjurred documentation, conspiracy to libel, illegal water seizures, etc, and Etc)

The so called No Action alternative completely ignores the fact that the average rancher has been forced through extortion to have already given up half of his A.U.M.S under "voluntary reduction" or he will have no A.U.M.S. The ranhers have been harrassed to sign their names to "renewed permits" with clauses stating that his grazing rights cannot be inherited by their family members! ANY ENDORSEMENT, EVEN ALTERNATIVE ONE ~~[illegible]~~ SPELLS DISASTER FOR [illegible]

~~THIS DOCUMENT~~

The entire premis of "sustainable yeild" (used to determine the number of cattle that can be grazed in an allotment) is riddled with arbitrary biased measurment criteria, is totally inacurate and does not describe the range allotment as to average or address the objective health. Under this "measurement system grazing numbers can never be increased but only decreased. "Key species criteria" completely eliminates any possibilties to improve the grass to shrub ratio. The US FOrest Service has successfully used this tecnique to create a tangled undergrowth so intense it strangles streams, starves deer, intensifies elm desease spread and greatly increases exteme fire hazards. Cheat grass if not properly grazed is as flammible as gasoline. ~~during~~

"RMP COMMENTS " PAGE 2 Sept, 15,1993 Ylst

Alternative 2 Additional lands under Federal management for expension is a well documented farce. The exact opposite is true. Economic development has always been stifled by Federal management and incompetancy.

Alternative 3 premis is more than false for economicdevelopment than Alternative 2.

Alternative 4 the so called preferred alternative. Preferred by whom. Ted angle was asked during a Nye County Commissioner meeting if any one spoke in favor of the RMP or desired alternative 4, during the recent BLM hearings. He said "NO" Alternative 4 is the death blow to multiple use, Nye County economy, and a "Takings Implecation" in gross violation of executive order #12630.

Artifacts. Certain obvious important universally accepted sites need to be preserved and protected. It is equally obvious that the discovery of one arrowhead need not condemn an entire valley. or an entire county. If all of the BLM artifact sites are so damned important why after more than twenty years have these sites not been completely studied, artifacts inventoried and removed to a museum? Closure of ten year old heavily used roads for one arrowhead is shear madness. Holding up a multimillion dollar drilling operation because so and so just can't be bothered to be timely is econmic ruin to private industry. To not let cattle graze because damage may occur to what could be found a thousand years from now is absolute lunacy. The entire EIS sysstem has been established and or been given control to fanatic environmentalists who in their religous ferver do not desire multiple use of public land. NYE COUNTY APPROVED PARKS [illegible] WILDERNESS NEVER!

Public input: There has been no public input by Nye County nor its affected citizens allowed by BLM during the draft planning stage in absolute violation of federal and state laws. There may be a basis for criminal action by Nye County on behalf of its citizens who may be free to bring criminal charges of malfeasance, misappropriation of public funds and conspiracy.

Public Iput continued:
If real public input is desired, than a thorough review of Nevada Farm bureau 1993 Policies Handbook and National Farm Bureu Policies Handbook is absolutely essential. The consensus on every conceivable issue presented in the Tonopah RMP is addressed. These policies represent the desires of all of rural Nevada and all of rural America respectively. Without rural America; the entire nation will go hungry, all industry will come to a screeching halt for lack of oil and minerals. Wood for paper and homes will continue triple in price every year. If the attitude of the policy makers Dept of Interior, U.S. Forest Service, B.l.M. do not change, we each and everyone of us will become environmentalists, those of us that survive. We who are left after the great famine and abandoned cities, after the great chaos has subsided, can look with glee at at our world wide "pristine" wilderness and murmur to ourselves, "Isn't life grand?" Be ware the ides of March, Solyent Green days are no upon us. In this story the author depicted future food shortages became so severe that the American Government processed our dead folks into little green waffers for food without telling us. Never fear Charleston Heston uncovered the plot. But what could he do about it? Our people needed to be fed.

Does all this sound far fetched? Enclosed are the Farm Bureau Policy Handbooks. The reccomendations and policies within are my additional objections to the Tonopah RMP. Please study them carefully and fully consider the total import they carry if not followed to the letter. They contain many reasonable compromises.

Since BLM policy is mandated by non-local influence and BLM has flagrantly ignored local input and continues to do so in violation of our civil rights as Nye county residents.

Since BLM actions violate federal laws and Nevada laws WITH ITS the method of writing, the biased wording, the falsified documentation, the faulty reasoning, the lack of scientific objectivity, the painting of a false picture, the scope of the publication to mandate an unworkable and financily ruinous trend for Nye County for the next twenty years

Since BLM has actually filed over existing water rights and intends to fence without consent the lawful users from their own water without consultation but by unlawful regulation edict through extortion (existing implied threat of reduced A.U.M.s under"voluntary" reduction in numbers or artifact witchhunting, or prolonged EIS studies to miners or etc.)

Since BLM does not document its employee time, project specific and thereby misleads congress in its funding requirements

Since BLM has declared large tracts of Nye County land as defacto wilderness under the guise of "Wilderness study areas" and these areas are indeed not roadless pieces of 5,000 (five thousand) acres or more as mandated by congress. (U.S. Forest Service purpotrated the same RMP for Humboldt. Illegal as hell)

Since BLM is fragrantly creating little miniture wilderness areas (Locks, Warm Springs, Abel) under the guise of"ripiran, wildlife refuge" or other catch phrase that's convienient

Since the entire phraseology, trend and BLM actions are based on bias, faulty measurements, reduction of jobs (outside of BLM) faulty reasoning IS unfair and that the entire Tonopah RMP is the culmination of these trends

Then I regard the Tonopah RMP as criminal, illegal, un-American, a nation starver, a civil rights violator, in-acurate, wrong, vile and evil because it goes against man in his environment, it is anti-productive in its basic intent and it denies us the citizens of Nye County to determine our own future.

Finally I think a Nye County Grand Jury Investigation is in order reguarding BLM activities in Nye County pursuant to NRS violations. A Public Lands Commission appionted by Nye County Comissioners is long over due. You are part of the problem, or you are part of the solution. Commisioners your duty is clear. The RMP itself is a facia case. FOR CRIMINAL PROSECUTION

COMMENTS RMP PAGE 5 Sept 15,1993 Ylst

The fish at Abel were planted by Fish and Game back in the early 1970's. Witness Bill Casey.

The fish at Warm Springs were planted recently

These fish are not natural to Railroad Valley. The fish are not native to those waters. They were put their artificially.

The water at Abel would not be there if the ranchers had not developed it and maintained it over the years. It is dully filed on at Nevada State Engineers Office and BLM has absulutely no claim to alter its use , point of deversion in any way shape or form. BLM will be remanded into custody of the Tonopah District Court for criminal prosecution if it thinks other wise.

Knapp Weed and ~~Mlogeton~~ Halogeton were introduced to Railroad Valley by Dept of INterior personell. Nye County is empowered to spray for obnoxious weeds and bill the offender under NRS after a complaint by a neighbor and citizen of the area. I hereby complain.

Cayotes can no longer be shot from a plane by Predator Control and they are killing one calf per night. Where are the mountain lions Tagged out by Fish and Gae no doubt.

I want Nye County to manage the land and collect the fees At least they will be objective and listen to what the people that depend on the land for their livelihood. WANT

I have the right to life liberty and the persuit of happiness both under the constitution and NRS. The Tonopah RMP 1993 makes that impossible. The RMP must go into the trash can and needs to be re-written from scratch with inputs during the planning from the Nye County Commissioners,Farm Buruea Policy as Guide and with a thorouch input from all the citizens of Nye County.

Ed Ylst Citizen of Nye County

73

Submitted 9-15-93

Norman Sharps Comments on B.L.M. Environmental Impact Statement Submitted to Nye County Commissioners

73-1 1- It appears B.L.M. Went through the motions of a comment period but actually made it Impossible for Ranchers and Citizens to participate in a public comment as only three minutes were allowed per individual to comment.

2- It is clear that this administration is intent on making Public Land grazing so costly and dificult that we cannot survive as Ranchers. This will destroy all Ranches and Ranching comunities in the West.

73-2 3- B.L.M. Made an agreement with Sharps. Sharps would take Non-Use of Aums for Range Conservation purposes instead of B.L.M. cutting numbers as suspended non use. This agreement was totally ignored In the Environmental Impact Statement.

73-3 4- The Resorce Management Plan fails to address the impact this Plan would have upon the economies of local towns and rural Nye Co.

Page 1 of 2

5- Agencies should account for all range dollars spent.

6 All BLM Personel should be held accountable for decisions made by themselves, if this decision has an effect on someone elses lively hood.

7- BLM and Forest Service personel should be required to describe the economic impact to customs and cultures, caused by action on Grazing, timber, mining, recreation and other uses of multiple use lands.

8 All grazing AUM'S are private property rights that belong to the Ranchers. This fact has been established by I.R.S when Inheritance tax is charged on A.U.M'S.

9 Local Economies depend on Ranching Mining, Oil, and recreational revenues, as their major source of wealth for survival.

73-4 10 One important Consideration which needs more and further detail, resolves around wheather suspended ~~non~~ use is voluntary.

or wheather (it) involves Concellation of livestock grazing with (re alocation) to other uses.

11- Desired stewardship principals which ~~accon~~ acomodate best management ~~management~~ practices require long term predictable lease agreements, that allow for permittees to have proper assurances that they will benefit from improved conditions over time.

73-5 12 I demand that takings Implication assements be made By BLM personel to comply with taking Executive Order 12630. When monitary losses occur to individual citizens property rights. Ranns are established property rights when the I.R.S. charges inheritance tax upon these AUM's

74

[illegible] Comments [illegible]
Written Response to June 1993
Tonopah Resource Management Plan
and Environmental Impact Statement
From Ken Taylor, HCR Box 48 Alamo, Nevada. 89001
(702)-729-2631

If these scaries of steps of a Management Plan are accomplished what will be the actual objective. If each use of a multiple use concept is eliminated what is left of a Public land.

The original Idea of BLM was to manage public lands until such time that the lands in question could be properly disposed. The time is way past. ~~Many ways~~

Many ways are available to dispose of these lands and at the same time provide economic growth versus Economic drain of the BLM.

Public Sale and private use of these lands would bring a real alternative and a true definition of No Action Alternative Plan for the BLM.

The Illegality and blatant Immorality in this document is glaring.

I find two year two million dollar funding an insult to each American Citizen.

I say no to accepting this document.

Kenneth J Taylor

75

To: Tonopah Resource Management and Environmental Impact Statement is just away to take away americans rights and property we dont need any of its ~~and~~ options. Central government is making a strong effort to stop any say from people in the local level.

Sharps have ranched in Railroad Valley for over 100 years with five generations involved. If we are doing the management wrong how come we are able to remain here.

Mercam Sharp Ylst.

76

Wolff Management Group
P.O. Box 93274
Las Vegas, Nevada 89193

September 29, 1993

Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada 89049

Because of the complexities and amount of data to be analyzed we request an extension to continue our review of the Tonopah Resource Management Plan and Environmental Impact Statement Issued June 1993.

76-1 It has been our conclusion from the data we have reviewed that Agriculture has not been addressed in detail for the Gold Point Area.

Our interests are to start an Agriculture project, in which we have a solid water supply and the business backbone to incorporate a Farming Community with the Mining Community in our area.

We believe that the project will increase employment and taxes for Esmeralda County and Federal Government.

We strongly recommend additional time be granted so that the above items and other comments can be forth coming.

We are sure that the BLM could not have forecast the demise of the Soviet Union and the impact it had on the U.S. defense spending. The decrease in Military spending will have a drastic effect in central Nevada, therefore any additional Business activity should be considered.

Respectfully,

Katina W. Cook

Katina W. Cook, CEO

cc: Senator Richard Bryan
Senator Harry Reid
Congresswoman Barbara F. Vucanovich

77

ROUND MOUNTAIN GOLD CORPORATION
SMOKY VALLEY COMMON OPERATION
P O BOX 480
ROUND MOUNTAIN, NEVADA 89045
(702) 377-2366

October 1, 1993

Mr. Ted Angle, Area Director
Bureau of Land Management
P.O. Box 911
Tonopah, NV 89049

Subject: Tonopah RMP Comments

Dear Mr. Angle:

Round Mountain Gold Corporation (RMGC) presents the following comments for your review and consideration concerning the Tonopah Resource Management Plan Draft Environmental Impact Statement dated June 1993.

It appears that considerable more work is necessary to reach a compromise that will be acceptable to the mining industry. The following statements emphasize our concerns and we offer our assistance in developing a reasonable document that will govern activities on federal lands for the next 20 years.

RMGC believes that Alternative #1, (BLM Tables A and B), should be the preferred alternative for Mineral Exploration and Development and Locatable Minerals.

RMGC believes that Wildlife Resources are currently and will continue to be protected under Alternative #1 in the RMP. The NEPA process coupled with current State and Federal regulations governing existing mining clearly demonstrates adequate control concerning wildlife management.

RMGC believes that Wilderness Study Area (WSA) management should follow the Alternative #1 option. RMGC contends that the present regulatory restrictions applied to mining are sufficient to balance the BLM's stewardship doctrine. It appears that Alternatives #3 and #4 are applying pseudo-Areas of Critical Environmental Concerns (ACEC) characteristics to presently unclassified areas which do not follow Federal Land Policy Management Act (FLPMA) policy.

77-1 One of the intents of Congress in passing the enabling legislation to evaluate Federal lands for wilderness characteristics under FLPMA was to end the divisiveness over the issue of lands not suitable for development. The Nevada BLM Wilderness review is now in front of Congress waiting for a decision. Once Congress determines the fate of the WSA recommendations, which considers the Governor's desires as well, the released WSA's need to be managed as multiple use areas as allowed for under the FLPMA policy.

77-2 The objective stated on page 2-33 for Wilderness Study Areas do not agree with the summary statement listed for WSA's on page SUMMARY - 2.

77-3 In several places throughout the RMP document, the phrase "undue or unnecessary" is used, (i.e., page 2-12 and on SUMMARY - 3). In other areas of the plan, the phrase "undue and unnecessary" is used, (i.e., SUMMARY - 3). Since the BLM 3809 regulations, as quoted on page 2-60, use the coordinating conjunction of "or", the language in the RMP document should remain consistent and reflect the intent of the language found in the BLM 3809 regulations.

77-4 Appendix 4 on page Appendices - 9 is arbitrary and capricious. The apparent motive behind this part of the document is not scientific and, therefore, not defensible. When considering this statement, the following needs explanation:

1. Page 2-14, paragraph #8. Does this mean that the BLM will use Appendix 4 as the primary means of wildlife mitigation and only resort to the SOP when the measures in Appendix 4 fail? How will success or failure of mitigation be determined?

2. Page 2-35, paragraph #4 and Page 2-49, paragraph #5. How will appropriate mitigation be determined? Arbitrarily setting action numbers in the RMP will lead to inadequate land use decisions.

3. Will existing operations be "grandfathered" if Appendix 4 is instituted in the final document?

77-5 4. In several places throughout the document the phrase "good or better condition" is used to describe objectives for wildlife habitat. How will the "good or better condition" be quantified? How will the "good or better condition" be factored into the release of mine reclamation bonds in 10 to 15 years?

5. Throughout the document, the term HMP's are mentioned. Please explain what these are and relate them to Appendix 4 if possible. Is there a connection here, or is this use strictly coincidental?

77-6 6. On page 4-37 under **Impacts to Locatable Minerals** it is stated that "Off site mitigation would be a cost incurred by larger mining companies if a prescribed acreage of wildlife habitat is disturbed (see Appendix 4)." This statement implies that the limit of mitigation is based solely on the company's ability to pay, rather than for a technical basis or need.

7. Page 4-71 discusses impacts to wildlife habitat from mineral exploration and development. In the last paragraph of this section the implication is made that mining activities should be ready to replace habitats destroyed by mining through appropriate off site mitigation.

RMGC presently has approximately 2500 acres of public land in a disturbed condition. Under this consideration and the proposed Appendix 4, RMGC would automatically be required to do off-site mitigation. However, off-site vegetation transects and vegetation transects on the mine property demonstrate that reclaimed sites are better than the native existing conditions.

FORM	OFF-SITE (% COVER)	ON-SITE (% COVER)
SHRUBS	14.7	3.1
FORBES	0.5	8.1
GRASS	1.0	3.9
TOTALS	16.6	15.2

If the mine's reclamation is better than the surrounding vegetation, does the U.S. Government owe the mining company some sort of mitigation? An interesting but improbable thought.

The BLM and the State NDEP presently have a Memorandum of Understanding that acknowledges the validity of a reclamation bond. With the acceptance of this bond, all necessary mitigation by a mining company has been admitted and no further off-site mitigation is required.

77-7 On pages 4-2, 4-19, 4-41, and 4-67 of the document under the section **Impacts to Watershed**, the statement is made "Long-term impacts would occur on 3900 acres of open pit mining which would not be reclaimed." Please explain what is meant here. Please quantify this number by individual mine. Are Round Mountain Gold Corporation's Manhattan or Smoky Valley pits contributing to this number? What data prior to mining activity is being used to arrive at this conclusion? How will this condition be reconciled at the time of reclamation bond release? Has the concern of patented verses non-patented acreage been factored into this 3900 acre number? This statement automatically placess the mining industry in a position for Appendix #4 type mitigation, which is not defensable.

We appreciate the opportunity to review and comment on this document.

Please call one of us at 377-2366 if you wish to discuss these comments.

Sincerely,

Duane L. Whiting
Environmental Manager

Paul Dusenbury
Sr. Environmental Engineer

DLW/PD:vt

c: (w/Tables A & B)

Chet Diercks (Mgr., Round Mountain Gold Corp.)
Meade Stirland (Env. Dir., Echo Bay Mines)
David Naccarati (V.P., Tech. Serv., Echo Bay Mines)
Chris Hayes (Staff Council, Echo Bay Mines)
Billy Templeton (State Dir., BLM)
Paul Scheidig (Admin., NMA)

78

BLUE EAGLE RANCH

HC 76 Box 100
Tonopah, Nevada 89049
September 28, 1993

Bureau Land Management
Tonopah Resource Area Manager
Box 911
Tonopah, Nevada 89049

Dear Sirs;

Due to conflict and short notice, we were unable to attend your hearings there in Tonopah on August 26, 1993.

We have reviewed the draft and feel great concern about the impact any of your alternatives will have on the local economies and residents of Nye County.

78-1 Even the best alternative fails to define ultimate goals. We feel all actions named would be detrimental to free enterprise in Nye County. Due to the lack of any local involvement in the planning and review, we would urge you to rewrite the document and include some local, knowledgeable persons in the process.

The harvesting and production of our natural resources is the only way to create wealth world-wide and especially in Nye County. This wealth is essential for a sound economy and vital to ensuring our present quality of life.

This proposed management plan is in all cases, detrimental to the efficient use of any natural resources in the County. We don't believe we can afford the luxury of such crippling practices in the name of environmental protection.

Sincerely,

Carl J. Hanks
Carole K. Hanks

79

TO TONOPAH RESOURCE AREA MANAGER

DEAR SIR:

THIS IS TO INFORM YOU OF MY PREFERENCE FOR ALTERNATIVE 3 OF YOUR RESOURCE MGT PLAN.

#3 INCLUDES A LARGER AREA + ALLOWS FOR ACQUISITION OF MORE BLDG SITES, BIKE PATHS ON R.R. RIGHTS OF WAY + HISTORIC STRUCTURES.

#4 ALLOWS FOR LEASING IN RHYOLITE WHICH IS UNACCEPTABLE EVEN IF THE SURFACE IS NOT IMPACTED.

AS FOR WILD HORSES + BURROS THERE ARE TOO MANY OF BOTH. THEY POSE A DANGER TO MOTORISTS ESPECIALLY AT NIGHT.

THEY ARE NOT "SACRED COWS" SO WHY NOT REMOVE ABOUT TWO THIRDS OF THEM?

THANK YOU

MARTY BIRDSELL

80

SEPTEMBER 27 1993

TO: Bureau of Land Management
FROM: GERALD MULKEEN
Subject: Tonopah Resource Management Plan
Reference: Rhyolite

It is important that the Bureau of Land Management adopt alternative 3 as its plan for Rhyolite.

Mining has played an important part in the growth and history of our country, and I think we owe it to future generations to preserve as much of this history as we can. Throughout this country many significant historical areas have been destroyed or commercialized strictly for economic gains. By adopting alternative 3 it will allow for future acquisition of the train depot which was and is an important part of Rhyolite.

I have visited Nevada on a regular basis since 1966. On a recent visit I became aware of the activities of the Friends of Rhyolite to preserve this town. I have joined this group and I strongly support their efforts.

Gerald Mulkeen

422 STRATFORD RD
UNION, N.J. 07083

81

September 29, 1993

Deborah Vermillion
701 Thornbird Dr.
Fallon, NV 89406

Dear Sir:

This letter concerns the study and proposal that the book "Tonopah Resource Management Planning and Environment Impact Statement" has brought to my attention.

My family has owned property in Railroad Valley for many years. We still spend alot of our free time in Railroad Valley and Morey area. We have always been compatible with the wildlife and environment. People (Native Americans, early settlers and todays ranchers) have lived in that area for hundreds of years without having a great impact on wildlife and environment. There is no reason why this cannot go on as it has been. Please think of what the impact would be on the lands owners and businesses. My family has a family cemetery set aside in that valley with several generations buried there, with many more who want to be laid to rest there. There can and should be more thought and study put into this.

Already so much of our land has been unaccessable to us, do not take any more away. The people should be kept informed of the studies and let us the people have a say in this matter. This office should take into consideration all of the letters and the meetings that were attended by the concerned citizens.

Thank you for your time,

Deborah Vermillion

82

HE BULLFROG MINE
AC MINERALS LTD.

way 374 West
O. Box 519
catty, Nevada 89003

553-2900
553-2963 Facsimile

LAC

September 28, 1993

Mr. Ted Angle
Tonopah Resource Area Manager
Bureau of Land Management
P.O. Box 911
Tonopah, Nevada 89049

re: RMP Comments

Dear Mr. Angle,

Lac Minerals is taking this opportunity to express its concerns with the Draft BLM Tonopah Resource Management Plan and Environmental Impact Statement, dated June 1993.

Specific areas of concern include:

1. Impacts on locatable minerals from proposed ACEC's
2. Impacts on cultural resources from locatable minerals
3. Limitation of opportunities for the exploration and development of locatable minerals
4. Economic impacts
5. Impacts on locatable minerals from special status species management

The Lac Bullfrog Mine is a large operating mine located in the Tonopah Resource Area. Therefore, the mine will be directly affected with the proposed changes in Alternatives No. 2-4 and is concerned with the substance and direction chosen to formulate each Alternative. The document is critically flawed in its assessment, analysis, and alternatives to manage multiple-use resources. Lac is concerned about the negative representation of the mineral industry and the misrepresentation of the values, opportunities, environmental effects, and the socio-economics of the mining industry.

According to the BLM SUMMARY HAND OUT item No. 6, "Mining is the second largest income producer, in the area (services is largest)." Therefore, the mining industry needs to be addressed in more detail with supportive data. We believe data exists to provide factual representation of the mineral industry, which in turn, needs to be used in formulating the range of management alternatives. The

supportive data used to make management determinations for each natural resource also needs to be summarized and included in the document.

The following pages discuss in detail, specific issues and statements which require further consideration and/or clarification.

1. Impacts on locatable minerals from proposed ACEC's

Lac's primary concern with the RMP is the direct effect that the proposed ACEC's and mineral withdrawal areas will have on future mineral exploration and development in the resource area. Lac believes those areas proposed for ACEC designation will not provide additional preservation and enhancement of fragile and unique resources, only because of reclassifying lands to be ACEC. The BLM already has the authority, and is required to protect special values and key resources while preventing undue and unnecessary degradation of the environment on all public lands under existing laws. All proposed disturbance activities must be in compliance with existing laws, whether filed through a (NOI) Notice of Intent, (PoO) Plan of Operations and an (EA) Environmental Assessment or an (EIS) Environmental Impact Statement. The laws include but are not limited to; (CFR) 43 CFR 3802 or 43 CFR 3809, (NEPA) National Environmental Policy Act of 1969, (FLPMA) Federal Land Policy and Management Act, (ESA) Endangered Species Act of 1973, U.S. Fish and Wildlife Section 7 Consultation, and (ARPA) Archaeological Resources Protection Act of 1979. In recent conversations with the BLM, an area designated as an ACEC does not allow any more or less latitude or trigger any different laws. The only difference is that a Plan of Operations has to be submitted in compliance with 43 CFR 3809, on all proposed surface disturbance within an ACEC area, regardless of the total disturbed area, where as, an NOI could be filed if the disturbance is under 5 acres. Also, an ACEC will allow the BLM to give those areas a higher priority. It is difficult to
82-1 believe an area of concern or in need of protection should become an ACEC so that it can have a higher priority level. Both filing processes still are required to be in compliance with the same laws. Also, both an NOI and PoO require a security bond with an amount that is approved by the BLM. If an area needs special attention, anyone including the BLM, can file a PoO to identify and protect the resources within the existing laws.

82-2 Several ACEC proposals call for land withdrawals from mineral entry on ground currently staked by valid lode claims. Such action would be considered a "taking" by most claim owners and would likely be followed by drawn out legal actions and fees. Should staked ground become open through abandonment and/or filing or assessment lapses, it is unclear as to whether a second party will have the opportunity to re-stake and further explore the ground.

ACEC and withdrawal proposals specific to the Rhyolite area will significantly impact the Bullfrog Mine in terms of adversely affecting potential growth and economics. The area has a drilled mineral resource with high potential for further exploration and development. The mineral resource projects onto the proposed ACEC of 61 acres and will be the focus of near future exploration programs. A substantial investment has already been put forth toward the Rhyolite property by Lac Minerals Bullfrog Mine, and any associated proposals in Alternative's 2-4 can only diminish this.

2. Impacts on Cultural Resources from Locatable Minerals

82-3 Portions of the RMP Draft regarding impacts on cultural resources from locatable mineral exploration and development which state, "partial or complete destruction of cultural properties," and land withdrawal proposals affording protection to 246 - 11,971 cultural sites, is untrue and grossly misleading.

82-4 The RMP draft estimates development of 24,650 acres where 538 cultural sites would be adversely affected by locatable mineral programs. The Draft also states that Alternative's 2 - 4, "would" afford protection to 246, 11,971 and 874 sites respectively, while Alt. 1 "might" afford protection to 499 sites. The basis for these statements is unclear when taking into account the fact that protection of the sites adversely affected by locatable minerals in Alt's. 2-4, will be administered under the identical laws and regulations used for Alternative 1. Clarification is required as to how the designation of an ACEC, "greatly enhances the management of a cultural resource area."

3. Limitation of Opportunities

Alternative's 2-4 limit exploration and development opportunities in areas known to have high potential for discovery of locatable minerals.

82-5 The objective under Locatable Minerals of Alternative 2 states, "To allow maximum opportunity for the exploration for and the location of locatable minerals." If this is true, a major conflict exists when closing 33,974 acres to mineral entry. Ground determined to have low potential for discovery and/or sub-economic minerals by one company or agency may prove to be the exact opposite to another company due to new interpretations and further exploration. New technologies and favorable locatable mineral prices would also influence the determination. Similar verbiage is used in Alternative's 3 and 4.

4. Economic Impacts

82-6 In Alternatives 2-4, under Impacts to Economic Conditions, the RMP Draft states, "No significant economic impact, either beneficial or adverse, to the minerals industry or to the local economy," and "minerals development potential under each of the alternative's remains largely unfettered." This statement must be based on the assumption that all acreage proposed for increased exploration and

development limitations and/or withdrawal from mineral entry, have no potential for discovery of locatable minerals, determination of which is largely unknown and untested. Economic impacts have the potential to be very significant in terms of adversely affecting both local communities and mineral industry.

Because of the proposed land withdrawals and exploration and development limitations, economic impacts of the RPM Draft have the potential to be significant. The Draft severely underestimates it's potential economic impacts especially when they will be coupled with the current increase in Federal regulations and fees. Alternative's 2-4 will initiate reduced exploration funding in the resource area, which in turn lowers the potential for discovery of locatable minerals. This will only add to the tremendous shift of mineral industry programs to Mexico and South America.

5. Impacts on Locatable Minerals from Special Status Species

All Draft proposals regarding the desert tortoise and desert tortoise habitat should be shelved until an accurate survey can determine it's actual distribution and condition.

Please accept these comments and concerns and incorporate them in your review and consideration. If additional or specific information is needed please contact us. Lac would also request participation in the final planning process.

Sincerely,

Lennie Boteilho
Environmental Coordinator

Sincerely,

Todd Osmundson
Sr. Exploration Geologist

83

United States Department of the Interior

FISH AND WILDLIFE SERVICE
NEVADA ECOLOGICAL SERVICES STATE OFFICE
4600 Kietzke Lane, Building C-125
Reno, Nevada 89502-5093

October 1, 1993
File No. BLM 5-1

Memorandum

To: Resource Area Manager, Tonopah Resource Area, Battle Mountain District, Bureau of Land Management, Tonopah, Nevada

From: State Supervisor, Ecological Services, Reno, Nevada

Subject: Draft Tonopah Resource Management Plan and Environmental Impact Statement

The Fish and Wildlife Service (Service) has reviewed the Draft Tonopah Resource Management Plan (Plan) and Environmental Impact Statement dated June 4, 1993. Our general and specific comments are provided below.

GENERAL COMMENTS

Both Alternative 1, the no action alternative, and Alternative 2 provide opportunities for private economic development and diversity. As a result, they only provide minimal protection for the ecosystems and biodiversity of the Tonopah Resource Area.

All of the alternatives concede off-highway vehicles would negatively impact the threatened desert tortoise. Our comments concerning endangered and threatened species will be addressed during consultation pursuant to section 7 of Endangered Species Act of 1973, as amended (Act).

83-1 Although the cumulative impact analysis briefly discusses the proposal by the Las Vegas Valley Water District to divert groundwater from the area to the Las Vegas Valley, other water pumping scenarios may also be an issue. There are several active operations and proposals to pump groundwater in the Beatty area. These actions could conceivably impact the Amargosa toad and the Oasis Valley speckled dace, both category 2 species for possible listing pursuant to the Act. Included in the Plan should be an evaluation of the impacts of water removal or transfer on various natural resources as well as a clarification of the Bureau of Land Management policy on the issue.

SPECIFIC COMMENTS

83-2 Management Determinations Common to all Alternatives, Forage Allocation. Page 2-5, column 1, number 3. The paragraph states: "If monitoring data show that wildlife are overusing the vegetative resource the Nevada Department of Wildlife will be requested to control the herd sizes at a threshold level which avoids resource damage." We recommend the criteria used to determine vegetation overuse by wildlife be specified.

Alternatives 1 and 2, Wildlife Habitat. Page 2-8, column 2, number 8 and page 2-14, column 2, number 7. The paragraphs state that animal damage control activities will be directed at predator populations throughout the resource area. Although alternative 2 provides opportunities for private economic development and economic diversity, it also allows for the protection of sensitive resource values. Predator populations are an important part of any healthy community. We recommend against any predator control programs that target populations and not individuals.

83-3 Alternatives 1 and 2, Forestry and Vegetative Products, Page 2-9, column 2, number 5 and page 2-16, column 1, number 5. Alternatives 1 and 2, Forestry and Vegetative Products. The alternatives allow for the collection of common desert plants in several areas. We recommend the document clearly define the term "common". The environmental impacts of removing common plants from the desert ecosystem should be discussed. We recommend the collection of any plants which are classified as endangered, threatened, proposed, or candidates for listing pursuant to the Act be specifically prohibited.

83-4 Alternative 1, Areas of Critical Environmental Concern, Page 2-10, column 2. Alternative 1 will retain two existing Areas of Critical Environmental Concern, the Timber Mountain Caldera National Natural Landmark and the Lunar Crater National Natural Landmark. We believe several other areas warrant designation as Areas of Critical Environmental Concern, including areas near Beatty containing the Amargosa toad (*Bufo nelsoni*) and the Oasis Valley speckled dace (*Rhinichthys osculus micrococcus*), the Lone Mountain area which is habitat for rare plants, and lands within Railroad Valley, home to the endangered Railroad Valley springfish (*Crenichthys nevadae*). We recommend these areas be included in the selected alternative.

83-5 Alternatives 1 and 2, Fire Management. Page 2-13, column 1, number 1 and page 2-21, column 2, number 1. Both paragraphs read: "All wildfires in intensity levels 1 through 6 will receive aggressive initial attack to contain them within 100 acres 90 percent of the time." We recommend the selected alternative allow for some natural fires and controlled burns in

appropriate communities such as sagebrush/piñon pine-juniper systems. As the Plan states on page 2-36 "Sagebrush/piñon pine-juniper is a fire dependent ecosystem and adverse ecological changes usually result from total fire exclusion (e.g. piñon/juniper encroachment of grassy areas or declining grassland productivity because of increased sagebrush cover)."

83-6 Alternative 2, Areas of Critical Environmental Concern, Page 2-18, column 2. Alternative 2 will designate the Lunar Crater National Natural Landmark and Lone Mountain as Areas of Critical Environmental Concern. As with Alternative 1, we believe several other areas warrant designation as Areas of Critical Environmental Concern, including areas near Beatty containing the Amargosa toad and the Oasis Valley speck ed dace, and lands within Railroad Valley, home to the Railroad Valley springfish. We recommend these areas be included in the selected alternative.

83-7 Alternative 3, Forestry and Vegetative Products. Page 2-25, column 2, paragraph 2. The paragraph states: "Limit authorizations to 600 trees per year until an inventory determining the sustained yield is completed and a new level of authorization is determined." Forested areas provide important migratory bird habitat. We recommend the document address the impacts of tree harvesting on migratory birds and provide the rationale for permitting harvest prior to determining the sustained yield. It is our opinion that harvest of any trees should not be permitted until the sustained yield is determined.

83-8 Alternative 4, Forestry and Vegetation Products. Page 2-40, column 2, paragraph 2. The paragraph states: "Permit the harvest of deadwood in all accessible woodland acreage." Snags and other deadwood provide important wildlife habitat and their decomposition returns critical nutrients to the soil. We recommend against the unrestricted removal of deadwood.

83-9 Alternative 4, Livestock Grazing Management, Objectives, Page 2-41, first column, objective. The objective reads: "To implement the recommendations of the rangeland monitoring and evaluation program to resolve identified resource conflicts and/or concerns in a way which will achieve multiple-use management." Some use may not be appropriate in every area. Livestock may need to be permanently removed from particularly sensitive areas such as some riparian or wetland communities.

83-10 Alternative 4, Lands and Rights-of-Way. Page 2-44, second column, number 6. The paragraph states: "No right-of-way exclusion areas will be established." We recommend the plan discuss the environmental consequences of this proposal. Although paragraph 5b addresses rights-of-way in some sensitive areas such as Areas of Critical Environmental Concern, we believe

that unless rights-of-way are specifically excluded from an area, it will be difficult to enforce environmental protection standards for the locality.

83-11 Impacts to Wildlife Habitat from Lands and Rights-of-Way, Alternatives 1 and 2. Page 4-5, first column, second paragraph, and page 4-22, second column, second paragraph. Both paragraphs state that land disposal will have long term negative impacts on wildlife. Although all land disposal is discretionary and preceded by an environmental analysis, disposal of smaller tracts of valuable wildlife habitat in a piecemeal fashion may mask the overall impacts to wildlife of many land transfers over time. These impacts could include genetic isolation and drift as land disposal leads to land conversion and wildlife population fragmentation.

Impacts to Special Status Species from Livestock Grazing Management, Alternatives 1 and 2. Page 4-5, second column, third paragraph, and page 4-23, second column, third paragraph. Both alternatives would allow livestock use in Amargosa toad habitats. We concur that this is likely to be detrimental to the toad, although some form of vegetation control may be needed near isolated springs inhabited by Amargosa toads to prevent the destruction of toad habitat as vegetation encroaches into the springs.

Impacts to Special Status Species from Lands and Rights-of-Way, Alternatives 1 and 2. Page 4-6, first column, second paragraph, and page 4-24, first column, first paragraph. The paragraphs state that important habitat for the Amargosa toad and Oasis Valley speckled dace (55 acres) would also be identified for discretionary disposal and disposal of these lands would have an adverse impact. We concur with this assessment and recommend the lands not be identified for discretionary disposal.

83-12 Impacts to Riparian Habitat from Lands and Rights-of-Way, Alternatives 1, 2 and 4. Page 4-7, second column, first paragraph; page 4-25, first column, third paragraph; page 4-73, second column, third paragraph. The paragraphs state that riparian habitat management could be adversely impacted since approximately 6 miles of streamside riparian areas would be identified for disposal. Riparian communities are of critical importance to wildlife in the desert southwest. We recommend against disposal of any riparia in Nevada.

Impacts to Riparian Habitat from Recreation, Alternative 1. Page 4-7, second column, second paragraph. The paragraph states: "Unrestricted off-highway vehicle use would adversely impact the riparian conditions along the Amargosa River drainage by compacting soils and crushing vegetation." We concur with this

assessment and recommend against any alternative which would allow unrestricted off-highway vehicle use in riparia or other sensitive areas.

Impacts to Wildlife Habitats from Utility Corridors, Alternative 2. Page 4-23, first column, second paragraph. The paragraph states: "Rights-of-Way authorized in utility corridors would adversely impact wildlife habitat....The greatest impacts would be associated with the construction of major pipelines or electric transmission lines which would be short term." Revegetation of pipeline rights-of-ways has been difficult in the past, and restoration is usually less than optimum if the revegetation objective is limited to erosion control. Therefore, we disagree that the impacts would be short term.

SUMMARY COMMENTS

Alternative 3 is the most environmentally sensitive alternative and provides the preferred means to conserve fish and wildlife resources. As noted in both our general and specific comments above, however, some elements should be strengthened.

We appreciate the opportunity to comment on this document. If you have any questions, please contact Paul Barrett or Mary Jo Elpers at (702) 784-5227.

for David L. Harlow

cc:
Director, Nevada Department of Wildlife, Reno, Nevada
Regional Manager, Nevada Department of Wildlife, Las Vegas, Nevada
Director, Bureau of Land Management, Reno, Nevada
Assistant Regional Director, Ecological Services, Fish and Wildlife Service, Portland, Oregon (AES)

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NEVADA MINING ASSOCIATION, INC.

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October 1,1993

Tonopah Resource Area Manager
Attn: Mr. Ted Angle
Bureau Of Land Management
4765 Las Vegas Drive
P.O. Box 911
Tonopah, Nevada 89049

Re: RMP Comments

Dear Tonopah Resource Area Manager,

Attached are comments of the Nevada Mining Association (NMA) on the DRAFT Tonopah Resource Management Plan and Environmental Impact Statement (DRMP/DEIS).

The NMA represents over six hundred (600) member mining companies, mining supplier businesses and individuals involved and interested in the mining industry in Nevada. The mining industry plays a very important role in the economic and social well being of the state. Because a large majority of Nevada's land base in under Federal management, the direction prescribed for those Federally controlled lands is of keen importance to NMA's members, especially when the potential and known mineral resources could be affected by such management direction. Moreover, several of NMA's member mines operate within the Tonopah Resource Area on BLM managed land.

Mineral resources are found only where they exist, regardless of other values that may be present from and on public lands. NMA's position, in that regard, is to assist those given the responsibility to allocate and make public land use decisions to understand appropriately the potential mineral resource and value trade-offs that cannot otherwise be mitigated if there is a conflict in managing other resources on the same piece of public ground. NMA, therefore, is very pleased to have this opportunity to express its concerns with the BLM's DRMP/DEIS for the Tonopah Resource Area.

NMA is concerned about the substance and direction of the Tonopah DRMP/DEIS. NMA considers this document to be flawed in its assessment, analysis and management prescription for the potential and real multiple-uses and resources, both consumptive and non-consumptive, on public lands within the Tonopah Resource Area. Moreover, NMA believes the DRMP/DEIS

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is written, and the resource decisions and consequences presented, in a manner that is difficult to follow and understand the rationale for the preferred alternative. The range of alternatives appear to reflect the extremes for managing the area. Also, of particular concern are the management constraints (especially for wildlife mitigation) that could be imposed on the mineral industry. The DRMP/DEIS also lacks a complete analysis of the values, opportunities, environmental effects, and socio-economics associated with the management of mineral resources. In addition, NMA believes that the DRMP/DEIS is flawed because of the inappropriate management direction it provides in its treatment of the wilderness issues; especially where specific direction is given to withdrawal mineral entry or apply a very constraining visual management objective on areas designated as Wilderness Study Areas that are not designated by Congress as wilderness.

Again, NMA appreciates this opportunity to comment on the DRMP/DEIS for the Tonopah Resource Area. If you have any questions regarding or require further clarification of the attached comments, please do not hesitate to contact either Paul Scheidig or me at NMA (702-829-2121).

Respectfully submitted,

NEVADA MINING ASSOCIATION

Michael J. Doyle
President

cc: Billy R. Templeton, State Director BLM, Nevada
Dan Rathbun, Deputy State Director, Resources
Tom Leshendok, Deputy State Director, Minerals

COMMENTS BY THE NEVADA MINING ASSOCIATION ON THE DRAFT TONOPAH RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT of the Bureau of Land Management, Battle Mountain District October 1, 1993

The Draft Tonopah Resource Management Plan and Environmental Impact Statement (DRMP/DEIS) prepared by the Battle Mountain District of the Bureau of Land Management (BLM), in general, is written and the resource decisions and consequences are presented in a manner that afford the reader little opportunity to fully understand how the BLM chose to develop the preferred alternative. The range of alternatives presented appear to weak, especially where Alternative 4, the preferred alternative, appears to have few distinguishing differences from Alternative 3 and, yet, great differences from alternatives 1 and 2. Of particular concern is the lack of explanation and analysis that demonstrates a need to adopt an alternative (Alt. 4) that appears to embrace non-commodity resource values at the expense of commodity values, especially when environmental needs are being met under the current management program (alternative 1). Moreover, the alternatives fail to adequately analyze mineral resources and the industry in terms of the positive resource opportunities, environmental effects, and socio-economic contributions. The DRMP/DEIS, therefore, appears to be flawed in its assessment, analysis and management prescription of the potential and real multiple-uses and resources, both consumptive and non-consumptive, on the Tonopah Resource Area in Esmeralda and Nye Counties of Nevada.

The following are detailed analyses, comments and recommendations, with special attention given to the mineral resource aspects, on the Tonopah DRMP/DEIS.

I. A. SUMMARY

84-1 The descriptions of the alternatives appear to be somewhat misleading and inaccurate. The analyses of alternatives in this DRMP/DEIS is far from a "zero-based" approach, which is the only way one can correctly establish a baseline for comparison between alternatives. By using the No-Action Alternative as the baseline, only means that the differences between the No-Action and other alternatives is a reflection of the differences between what Congress and the BLM believed was the mandate for multiple-use under the Federal Land Policy and Management Act (FLPMA) before and how that mandate may be interpreted differently in the future. In fact, Alternative 1 is very similar to Alternative 2 and Alternative 4 is similar to Alternative 3. Moreover, the DRMP/DEIS fails to describe in this section and in other sections, the necessity to change management requirements from what is reflected in Alternative 1. A more apt and complete description is needed, even though this is a Summary section. The problem is that this is the first section to influence the reader. As the first, it should be more reasonable in providing descriptions of the alternatives.

B. Table S A Resolution of Issues by Alternative

84-2 Several descriptions in this table are incorrect and do not reflect information included under the more expanded explanations that follow. For example, Summary-2, Wilderness Study Areas Returned to Multiple-Use, states under Alternative 4 that ". . .upon completion of development areas will be reclaimed to resemble a natural state." This statement is absent elsewhere in the DRMP/EIS and is absolutely inappropriate. The Plan of Operation and Reclamation Plan should be the documents that determine the post mining land use and reclamation standard that is applicable to a site, not some arbitrary and capricious statement in the summary section of this document. Moreover, if a WSA is released by Congress, according to the constraints and management direction imposed by this alternative, very few opportunities will be available for mineral development. This statement should be deleted.

84-3 Under Mineral Exploration and Development, Alternatives 3 and 4 the terms ". . .preventing undue and unnecessary. . ." should be changed to read "preventing undue or unnecessary" to be consistent with current rule under 40 CFR 3809 language.

C. Table S-B Summary of Impacts by Alternative

84-4 This table is misleading and confusing and needs to be completely redone. For example, under Locatable Minerals none of the alternatives will provide for any one of the percentages of land area open for mineral entry. The VRM Class II objectives alone will prevent at minimum 10 percent of the Resource Area from mineral exploration and development, not to mention the withdrawals for wildlife, WSAs and ACECs and other special needs. Again, this Table is a poor representation of the impacts and appears to make Alternative 4 look like a reasonable choice.

II. CHAPTER 2 ALTERNATIVES

84-5 The range of alternatives is of concern, as previously noted in the beginning of these comments. With the exception of the description of the scoping of issues in the development of this DRMP/DEIS, there is no apparent logical rationale of why the current management direction does not meet with the intent and requirements under FLPMA and how the preferred alternative will better meet those requirements and needs. The preferred alternative is a vast departure from the current direction. A more complete explanation of this departure is needed, especially since the preferred alternative is characterized as the best mix of the three alternatives originally developed to

address concerns and issues. However, if alternative 4 were placed on a spectrum, where the extremes were represented by commodity (Alt 2) and non-commodity (Alt 3) management uses, it most certainly would be very near to Alternative 3, not anywhere near the middle of these extremes. Therefore, the range of alternatives examined appears to be at the extremes of the possibilities of management and no alternative is presented that would provide a picture of what the middle-of-the-road management would afford. An additional preferred alternative is needed and warranted, otherwise Alternative 1 should be the preferred alternative.

84-6 Of additional concern is the treatment of wilderness under all alternatives. All of the alternatives have as their objective "To return all Wilderness Study Areas released by Congress to multiple use." However, only alternative one affords this objective to ever see the light of day. Alternatives 3 even withdrawals 336,150 acres from mineral entry and severely restricts motorized use, and Alternative 4 imposes a VRM Class II objective on these same acres, which means you can not do much more than look at these acres. Moreover, neither of these two alternatives indicates just where these 336,150 acres are located. In addition, Maps 41 and 42 include Antelope Range, Park Range and Riordans Well as WSAs. Yet the BLM's Final EIS and Record of Decision on WSAs in the State of Nevada does not include either of the last two WSAs and lists the Antelope Range WSA as being in the Shoshone-Eureka Resource Area. Is this DRMP/DEIS intending to manage WSAs that do not exist and exist outside its resource area? Also, management constraints are applied to about 604,000 acres of a total nearly 669,000 acres under WSA status. What management if any is being applied to the 65,000 acres not accounted for in the DRMP/DEIS (of course the 669,000 acres do not include the acres from the three WSAs noted above). NMA must assume that at least 10 percent of the WSA acres will achieve the stated objective and 90 percent of the WSA acres in Alternatives 3 and 4 will not meet its objective. This management direction is not only a violation of the BLM's own WSA management policy but also bad public policy by preempting the actions of Congress. It clearly establishes de facto wilderness for mineral development. Therefore, except for Alternative 1, there appears to be no alternative in the Tonopah DRMP/DEIS that analyzes the impacts of managing these WSA acres for full unrestricted multiple-use, which is the stated management objective. Only Alternative 1 is acceptable.

84-7 NMA also is concerned that Alternatives 2, 3 and 4 impose a wildlife off-site mitigation standard for disturbance by locatable mineral development activities when habitat of a size as prescribed in Appendix 4 is affected. Off-site mitigation requirements should be based on a site specific

need, not some arbitrary habitat area of disturbance. Habitat for a species can exist almost anywhere, and yet the species may not even occupy or use that location. So if a particular population is directly or indirectly affected by a mineral operation then a determination should be made if such impacts can be mitigated on- or off-site, not because some Appendix exists in a RMP that requires off-site mitigation. Moreover, Appendix 4 is contrary to the Standard Operating Procedures stated on page 2-53 for Fish and Wildlife. Appendix 4 should be deleted from the DRMP/DEIS.

84-8 Alternatives 3 and 4 propose ACEC designations that will withdrawal mineral entry. Many of these areas have existing and valid lode claims. Such withdrawals would constitute a "taking." The DRMP/DEIS is silent on this issue and should consider the consequences of the proposed withdrawals. Moreover, the ACEC and withdrawal proposals specific to the Rhyolite area will adversely impact the potential growth and economics of the LAC Mineral Bullfrog Mine, a member of NMA. LAC has a drilled mineral resource in that area with high potential for further exploration and development. This mineral resource extends into the acres proposed for withdrawal under Alternatives 3 and 4 and could severely affect planned future exploration programs by LAC. In addition, LAC has already made substantial investments in the Rhyolite area property. Implementation of any of the alternatives that would designate Rhyolite as an ACEC would be devastating to LAC's investments and future development plans. NMA suggests that the Rhyolite ACEC proposals be deleted from consideration.

III. CHAPTER 3 AFFECTED ENVIRONMENT

In general, the descriptions of the affected environment are, for the most part, sufficient but not necessarily full and complete.

Under Air Resources, even though the DRMP/DEIS is correct in what it states, it lacks a proper explanation. When one turns to the Consequences section and reads that there are air impacts that "for short periods" violate State air quality standards because of mining, one would believe that the affected environment erred. This section should explain that the mines all have air quality permits from the State of Nevada, Division of Environmental Protection, Bureau of Air Quality and are not permitted to violate ambient air quality standards, even for short periods. Particulates (10 microns in size or less) are the largest air quality issue in the Resource Area, but mines control such to a high degree, and that Mother Nature (wind blown dust/haze) presents the greatest problems.

84-9 Under Wilderness, page 3-20 and 21, how does the BLM believe it can "reintroduce WSA lands to multiple-use management" by retaining wilderness (single/restrictive use) qualities. The Environmental Consequences of Congress not accepting and designating an area as wilderness should mean to the BLM that it does not need to and should no longer preserve the area for primitive or semi-primitive management. Moreover, such management is not multiple-use as prescribed by FLPMA. Thus, Table 3 G is not applicable nor necessary and should be deleted.

84-10 Under the Social and Economic Conditions, the DRMP/DEIS does a poor job of properly representing the mineral industry's economic contributions. The employment and dollar figures represented for Mining appear to only reflect the direct employment and not the indirect employment. There are nearly 3 jobs created in the marketplace for every direct mining job. Thus, if there are 1,909 jobs in mining, then that generated almost 6,000 jobs in the communities, which the DRMP/DEIS failed to credit to the really positive socio-economic impact mining created. In addition the DRMP/DEIS is a little too generous in giving credit to the Federal Government for the socio-economic benefits just because over 74 percent of Nye County and 99 percent of Esmeralda County is under Federal land management control. The true economic benefit lies in how the private enterprises in the area have been able to develop and use the natural resources of the area under Federal management.

IV. CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

In general, many of the environmental consequences are stated in a subjective and unqualifiable manner. Most non-consumptive resource uses (recreation, wildlife, cultural resources) are characterized as management improvements or enhancements to the environment and use of the area. On the other hand consumptive resource uses (mining, cattle grazing, off-road vehicle recreation use) are characterized as negative impacts on the environment with no potential for beneficial use. Where these subjective statements are made there is little, if any, solid data or quantification or qualification as to what really is the benefit or effect. Such conclusions are not only inappropriate but also inaccurate in attempting to document the environmental consequences of a particular action. If there is no data to quantify or qualify the "significance" of a benefit or impact, then the statement should either be deleted or qualified by some hard fact or data. Thus, this chapter is inadequate in presenting an objective representation of the environmental consequences of the alternatives and needs to be rewritten.

84-11 Under Impacts to Air Resources, every alternative states that

State standards for particulates will be violated by mining for short periods. This is incorrect since every major mine has air quality permits from the State that require strict adherence to ambient air quality standards for particulates. This section should be corrected for every alternative.

84-12 Under Alterative 1, Impacts to Watershed, page 4-2, the DRMP/DEIS states that 3,900 acres of open pit mining would not be reclaimed. Where are these 3,900 acres and are they from old abandoned mining operations, which are decades old, or are they under current operation? If the later, the DRMP/DEIS should correct the statement by referencing the State (NRS 519 A) and Federal (40 CFR 3809) requirements that all existing operations have a reclamation plan in place and have their properties bonded for reclamation purposes.

84-13 Under Impacts to Special Status Species, From Mineral Exploration and Development, every alterative includes the assessment that "there is the potential for a small number of tortoises to be killed by mining activity." There is no justification nor proper evidence for this statement. Current mining operations in tortoise habitat areas are carefully planned to protect and manage desert tortoise. Even the U.S. Fish and Wildlife Service's recent Tortoise Habitat Recovery Plan states mining as an activity that presents little risk and is compatible with the habitat objectives outlined in that document. The DRMP/DEIS should remove this statement and replace it with a positive statement about the potential for mining to co-exist with the desert tortoise in its habitat area.

84-14 Under Impacts to Cultural Resources/Paleontological Resources, From Mineral Exploration and Development, every alternative includes the statement that "impacts from locatable mineral development include partial or complete destruction. . . Cultural properties might also be buried under mountains of waste rock while visible features are more likely to be illegally collected and excavated." This is such an arbitrary and capricious statement and should be deleted from the text unless the BLM has hard evidence to the contrary. Current operations must conduct archeological surveys and mitigation practices, under proper supervision, before an operation can proceed. Miners are not and should not be characterized as illegal parties in such a generalized fashion. Again these statements should be deleted.

84-15 Under Impacts to Locatable Minerals, From ACECs, Alternative 4 does not even address the very real negative impact the designation and mineral withdrawal of the Rhyolite ACEC would have on LAC Mineral's operation. Moreover, Alternative 3 states that four notices would be converted to Plans of Operation yearly in the Rhyolite ACEC. Yet, under this

alternative 460 aces would be withdrawn from mineral entry. So how does neo get an approved Plan of Operation in an ACEC that has been withdrawn from mineral entry? These impacts should be fully explained.

Under Identification of Resources Impacted Cumulatively, Social and Economic Component, the statement is made that "None of the alternatives provide sufficient inducement or discouragement to effect a significant change in the plans or perceptions of that industry [mineral]." Depending on how one defines "significant" this statement seems to be a very casual and incorrect. There are several aspects of this DRMP/DEIS that would discourage many mineral interests from expanding or exploring for new opportunities. The Rhyolite ACEC is a prime example, as are the management objectives for nonwilderness designated WSAs. This very arbitrary statement should be deleted.

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SIERRA CLUB, TOIYABE CHAPTER (excerpts from original letter)

85-1 Watershed

1. The determinations appear to depend on costly, structural "improvements" designed to control the symptoms of watershed damage, not the causes. We strongly suggest a determination be added requiring the development of watershed recovery plans. These should consider more cost-effective non-structural solutions, including improved livestock management or exclusion of livestock from areas which are actively eroding or desertifying, road closures or relocations out of riparian areas, etc. In any event, facilities should be a last resort, not the first choice. Otherwise, public funds will be endlessly spent on bandaide solutions, avoiding the necessity for BLM managers to control the causes of watershed damage.

85-2 Vegetation

2. Add "implementation" and a schedule to the preparation of activity plans. Disclose who many activity plans have been prepared and implemented in the RA over what time frame in the chapter on the affected environment.

85-3

3. Add a determination authorizing the closure of existing or vacant livestock allotments where livestock have substantially damaged watersheds until watershed recovery objectives have been met. The RMP proposed closing hundreds of thousands of acres of public lands to mineral activities and ORV activities to protect sensitive resources, but not one acre to livestock use, even though livestock use is actively, chronically, and substantially damaging public lands and resources, especially riparian areas.

85-4

1. Why don't desired plant communities include wild flower (forb) species? Wildlife, including insects, use wild flowers. Occasional spectacular wild flower displays on public lands are one of the RA's greatest attractions and values. Add wild flower species to the desired plant communities. Likewise, why no tree species in the DPC list? Please add.

85-5

2. Add a determination authorizing the closure of existing or vacant livestock allotments where livestock have substantially damaged vegetation until objectives for restoration and/or rehabilitation of vegetation damaged by livestock grazing have been met. See discussion under

Watershed #2 above.

Wildlife Habitat

85-6 1. Add a requirement for and schedule of "implementation" of HMPs. Disclose how many HMPs have been prepared and implemented in the RA over what time frame in the chapter on the affected environment.

85-7 2. Add a determination to support reintroductions and augmentations of native wildlife species in the RA.

85-8 3. Add a determination authorizing the closure of existing or vacant livestock allotments for the purpose of preventing wildlife habitat deterioration caused by livestock or for enhancing wildlife habitat conditions. See discussion under Watershed #2 above.

85-9 1. We strongly object to disposal of riparian areas, for any purpose. Such biologically important areas are very rare in this entire RA. Add a determination that no riparian areas will be subject to disposal.

85-10 2. Add a determination that mitigation will be required for any damage to riparian areas or resources by mineral or recreational activities.

85-11 3. Does the proposed requirement for managing for 70 percent streambank stability ratings and 70 percent cover ratings equate to the BLM national riparian objective of managing 75% of riparian areas on public lands in proper functioning condition by 1997? If not, the proposed determinations should be strengthened to meet national policy requirement.s

85-12 4. Add a determination that existing spring developments be fenced to protect from adverse livestock and wild horse and burro impacts before any of the 23 proposed spring developments would be initiated.

Livestock Grazing Management

85-13 1. Add a determination that livestock be excluded from all lands in unsatisfactory condition unless a rehabilitation plan to restor public lands to satisfactory condition approved by the BLM is implemented and rehabilitation objectives are being met on an annual basis.

2. Add a determination that livestock be excluded from all lands which are unsuitable for livestock grazing.

85-14 3. Add a determination that any funds for range improvements should be spent to restore and rehabilitate riparian ares and wildlife habitat damaged by livestock mismanagement before the projects listed in Appendix 5. We object to spending any public funds to benefit privately owned livestock.

85-15 4. Add a determination to terminate environmentally damaging season-long livestock grazing on every allotment.

Wild Horses and Burros

85-16 1. Add a determination to manage wild horses and burros in compliance with current BLM national policy, including releasing older unadoptable animals.

2. Add a determination that wild horses and burros removed because of resource damage will not be replaced by livestock.

Lands and Rights-of-Way

85-17 1. Provide a determination to terminate the extensive trespass on public lands as disclosed on p. 3-15.

85-18 2. Provide a determination that all NORAs will be by sale or exchange.

3. Provide a determination that no public lands will be disposed unless comparable private lands are acquired.

ACECS:

85-19 1. Add a determination that management plans will be developed for all designated ACECs.

2. Add the following area to those designated as ACECs:

85-20 **The Sump:** about 1960 acres, located at the north end of Fish Lake Valley in Esmeralda County at T1N,R35E, including the following sections: SW corner of Sec. 15, East half of SE quarter of Sec. 16, All of Section 21 except for the NW quarter of the NW quarter, West half of Section 22, All of Section 28 except for the SE quarter, and the East half of Sec. 29, elevation: 5100 ft to 6000 ft.

The Sump is a scenic badlands area, an elevated lake bed of mid-tertiary time. The ancient Lake Esmeralda

sediments are eroded into colorful spires and deep narrow gorges. The towers are sometimes toped by mushroom shaped rock caps, in pastel shades. The cliffs are also colorful in shades of red, brown, and yellow. The area contains a standing petrified forest, with petrified trees on 3 to 5 foot pedestals of mud. Fossils of camel and other large mammals are also found in the area. Overall, the area resembles a huge roofless grotto or an Egyptian temple in mud. Each rain can totally change the fantastic mud landscape.

The area meets relevancy criteria as it is incredibly scenic, it beautifully illustrates the natural process of accelerated erosion, and it is a natural hazard. It also meets importance criteria as it is an excellent late Tertiary - 11,000,000 years old - paleontological site, contains an extensive petrified wood, is fragile, sensitive, rare, unique, and threatened by fossil collectors.

85-21 Recreation:
Add a determination that the BLM will resolve public access problems in the RA.

85-22 Wilderness:
Correct the misstatement on p. 2-47 that WSAs will be returned to "multiple use." Recreation, livestock grazing, cultural resources, ACECs, wildlife, wild horses and burros, riparian,and watershed uses and values occur in wilderness and in WSAs. Are these not "multiple uses?" Perhaps the dRMP meant "motorized uses!?

85-23 I. Chapter 1:
A. Ecosystem management: We could find on reference to BLM's intent to manage the public lands in the Tonopah RA through ecosystem management. Is this omission intential? If not, please add clarifying statements in Chapter 1 - relationship to BLM policies, determinations in Chapter 2 in each alternative providing Plan direction to change current management to ecosystem management and an analysis of the impacts of changing to ecostytem management in Chapter 4. If not, why not?

85-24 B. Biodiversity: Likewise, we could find few references to managing for biodiversity on public lands. Please clarify and add appropriate Plan direction.

85-25 C. Previous Land Use Plans: Reference is made to two previous land use plans and EISs for the Tonopah RA, but few or no links are made between existing plans and the proposed RMP. For instance, very little information is provided on the livestock management (forage allocation) program. We are referred to the Tonopah MFP and Livestock Gazing EIS and Esmeralda RMP for details. We are assured (p. 1-1) that a rangeland monitoring plan has been implemented and use adjustments have been proposed based on monitoring data and guidance provided in the MFP/RMP and that the on-going monitoring data and guidance continues to provide adequate managerial guidance. In fact, the decision (p. 2-51) to eliminate an alternative "dealing with the allocation of forage and removing livestock from allotments with less than satisfactory range conditions" was based on this rationale. What is the justification for this seemingly arbitrary decision? How can the public know whether this decision is sound without any supporting information?

85-26 Why does the BLM consider that the prior MFP/RMP "managerial" guidance is adequate? What use adjustments have been "proposed" based on monitoring data and MFP/RMP guidance? What use adjustments have actually been made on each allotment? Were these adjustments in the number of "paper cows" or did they result in actual reductions of livestock use in each allotment? Have livestock numbers been reduced to the carrying capacity in each allotment? If not, when will these important adjustments be made? How much monitoring and evaluation has actually occurred in each of the allotments? What are actual rangeland conditions on each allotment? Have rangeland conditions improved on each allotment? Have improvements met the MFP/RMP requirements? If MFP/RMP objectives have not been met by the rangeland management program, how can BLM assert that the previous plan direction is adequate?

In any event, we are extremely concerned that this RMP omits critical discussions of the livestock management program. We are referred to previous land use plans with absolutely no information on whether the previous land use plans have been implemented and where the grazing program is meeting existing land use plan objectives. Without specific information, the public cannot hold the BLM accountable for implementing the existing land use plan requirements to improve rangeland management.

85-27 We strongly urge the BLM to fully disclose vital information on the livestock grazing program, including the following at a minimum:
- information on condition and trend of each

allotment
- information on monitoring and evaluations for each allotment
- information on actual adjustments in livestock numbers seasons of use and other changes in grazing practices based on monitoring and evaluation
- information on whether MFP/RMP requirements and objectives for the rangeland management program have been met

Much of this information can be included in tabular form by expanding Appendix 6 and 7 currently limited to forage allocations.

85-28 D. Plan Implementation:
Likewise, we would like this RMP to disclose whether and how much implementation of the previous MFP and RmP has been accomplished since 1981 and 1984, respectively. Was a monitoring and evaluation schedule and set of standards (p. 1-5) established for either the MFP or the RMP? Were periodic reviews done every five years? Was documentation of monitoring of each resource category done annually and where is it filed? Please disclose the results of the monitoring and evaluations and the periodic reviews in this RMP.

Was the Implementation Schedule (p. 2-63) established for either the MFP or the RMP? If so, die it establish priorities? Was it the basis for short-term and long-term budget requests? How was it used in monitoring and evaluating the approved plans? Please disclose the Implementation Schedules, priorities, and budget requested and actually received and spend for the MFP and the RMP. If an Implementation Schedule was not established for the existing land use plans, why not? How were priorities set?

II. Chapter 3: Affected Environment

85-29 A. Soil Resources:
- What are the causes of the "accelerated erosion" (p. 3-1) in portions of certain watershed? Where is this problem located? Is it natural or caused by human uses such as livestock grazing or roads or mining activities? If natural, how does the extend of this erosion compare to erosion caused by man's activities? Can the accelerated erosion be prevented by improved management practices? This rather superficial discussion should be expanded and deepened.

85-30 B. Water Resource:
- What water quality data ae available? Which EPA drinking water standards are violated? In which water source? What are the "principal non-point source" problems? Are they the same as the "constituents of concerns/" Why does the BLM think that whatever these problems are, they are "the result of streambank erosion and sedimentation?" What are the causes of the referenced streambank erosion and sedimentation? Please expand this discussion.

85-31 C. Vegetation:
- On pp. 3-2 to 3-3, references are made to the conditions of the different vegetation communities - "generally in early or mid seral stage," "late seral," etc. Please disclose the basis for these statements. Please disclose the condition of vegetation by community type and by allotment in the RMP by table.

85-32 - On p. 3-3, riparian areas are describes as 1% of the RA, along streams and springs. On p. 3-6, a statement is made that "riparian areas around springs and seeps have not been inventories for condition." Why haven't the conditions of these biologically important areas been inventoried? How can the impacts of the proposed alternatives be analyzed in Chapter 4 unless current riparian conditions are known? Do the riparian objectives in the four alternatives apply to just streamside riparians? If so, objectives should be added to each alternative to protect spring and seep riparians. If not, then how will the BLM know if the spring and seep riparians are in "proper functioning condition?" Will BLM protect spring and seep riparian areas or are these to continue to be "sacrifice areas" for livestock?

85-33 D. Livestock Grazing Management:

1. Please see questions and discussion of the rangeland management program under 1.C. above.

2. What is the extent of the livestock trespass in the RA? Please describe and disclose what the BLM is doing to eliminate trespass.

3. Is ephemeral grazing permitted? If so, how much?

4. Are temporary non-renewable grazing permits allowed? If so, how much?

85-34 E. ACECs:
- What were the other 23 areas nominated for ACEC designation? Why were each not proposed for ACEC designatio?

III. Chapter 4: Environmental Consequences:
A. Assumptions:

85-35 1. What is the rationale for the assumption that "funding and personnel would be sufficient to implement any alternative described in Chapter 2?" Was funding and personnel sufficient to implement the existing MFP and RMP? How much was spent since 1981 and 1985, respectively, to implement the MFP and the RMP? How much of the existing land use plans was actually implemented? (See discussion above in I.D.) How much funding and personnel will be needed to implement the alternative selected in this RMP? If by change funding and personnel are insufficient to implement the RMP, how will priorities be set?

2. Likewise, has the BLM adhered to "all Bureauwide requirements and standard operating procedures providing for protection of the environment?" If so, why is overgrazing continuing? Why haven't livestock numbers been adjusted to the carrying capacity of each allotment? Why is season-long grazing taking place in most allotments in the RA? Why is some wildlife habitat in poor condition? Why are riparian areas in less than proper functioning condition? Why haven't all land use plan objectives for environmental protection already been met? Please clarify this "assumption" or change it to reflect the actual public land management realities.

IV. Appendix 2:
85-36 - Why aren't percentages of plant species given in the DPC? Is one plant of each species sufficient to have a community judged to be at DPC? Please explain.

V. Appendix 4:
85-37 - We strongly object to the mitigation threshold for "trout and riparian" areas as 2 acres. Many springs and seeps are less than two acres but extremely important biologically. Even two acres of a stream riparian is critical when less than 1% of the 6,000,000 acres of this RA is riparian. We urge that this threshold be changed to the loss of any amount of trout or riparian habitat. We can't afford to lose any riparian habitat.

VI. Appendix 9:
85-38 - We appreciated having the dRMP explain in detail how livestock and wild horse and burro numbers are adjusted based on monitoring. We suggest that you expand this appendix to explain the allotment evaluation process also. See also comments above in I.C.

86

NEVADA STATE CLEARINGHOUSE, DEPARTMENT OF MINERALS (excerpts from original letter)

Need for current data and revision of development Scenarios

Much of the data presented in this report is outdated (1989 and 1990). Current data is available with respect to mineral-related production, employment, leases and claims held, and overall employment and salary statistics.

Use of outdated information may result in flawed scenarios for development of resources as projected in Chapter 4 under Cumulative Impacts. (pp. 4-92-101) For example, on page 4-93 under "Reasonable Foreseeable Development Scenario for Oil and Gas," the following is stated:

86-1

> "It is anticipated that 30 wildcat wells would be drilled in the next 15 years and these would lead to the discovery of two additional oil fields."

Based on NDOM data on well permits, 17 wildcat wells have been permitted in the past 20 months. At this rate, over a 15 year time period as many as 145 wells could be drilled. And using the same percentages for discovery of new oil fields as is in the DRMP-EIS, as many as 10 new fields could come into production (rather that the two suggested).

86-2 Under the "Reasonable Foreseeable Development Scenario for Locatable Minerals" heading on pages 4-95 through 4-97 there is a gap between Scenario E (on operations with 15-40 employees) and Scenario F (on operations with 300-600 employees). Based on current mining activity in the Tonopah RMP area, the development of several mines with 40 to 300 employees is likely with the life of this plan.

Locatable Minerals

86-3 In Chapter 4 under "Impacts to Locatable Minerals" on page 4-62 (Alternative 3) and page 4-88 (Alternative 4) there is no impact category for "From Visual Resource Management" and an accompanying assessment. VRM designations will have a significant impact on whether or not mineral development will be allowed and to what extent and cost.

Cultural Resource Management

86-4 Under Alternatives 3 and 4 (Preferred) cultural resource management is given a very high priority by

management practices. For example under the proposed Stormy-Able ACEC, vehicle use would be limited to existing roads and trails; mineral leasing allowed only with no surface occupancy, and "no land uses will be authorized which are incompatible with the values being protected." (p. 2-27)

Wilderness Study Areas (WSAs)/Recreation

Apparently, much of the WSA acreage not designated by Congress as wilderness will be managed as primitive (90,370 acres) and semi-primitive non-motorized areas (339,120 acres). Vehicle use would be prohibited under Alternative 4 (Preferred). Under Alternative 3 these areas would be withdrawn from mineral entry and "Discretionary actions not appropriate within primitive/semi-primitive settings will not be authorized." (p. 2-33)

86-5 The NDOM feels these designations are contrary to Congressional intent to release unsuitable WSAs back to multiple-use. Such designations to restrict access are an attempt to create additional areas of de facto wilderness and should not be allowed.

Special Designations

The NDOM agrees with the decision of the BLM to revoke special designation of the Pinon Joshua Tree Transition Research Natural Area (RNA) (p. 2-8) and open it to mineral entry, as it has been determined that pinon trees are not found there. This does bring up the question as to how the special designation was determined in the first place and should serve as a caution against injudicious use of special area designations.

86-6 The designation of 15,470 acres of the Railroad Valley Wildlife ACEC as a SRMA would limit fluid mineral leasing to no surface occupancy and restrict vehicle use to existing roads and trails. This is too restrictive for the amount of surface disturbance likely to occur in this area.

Conclusions

86-7 Statistical data used in the Tonopah DRMP-EIS should be updated to calendar year 1992. This should include all information on mineral and oil production values, employment, salaries. per capita income, number of leases and claims held, tax, and land status data for the RMP area.

86-8 Charts showing the availability of lands for locatable minerals (as well as non-energy leasable minerals and salable materials) relative to resource potential should be included as they are for fluid mineral leading. (Table 4A-C)

86-9 The Tonopah DRMP-EIS should list in chart form the numbers and kinds of mineral operations which will be impacted or denied due to the proposed alternatives, and estimate economic impacts to the counties and state.

86-10 Maps showing all mineral withdrawals and restrictions should be developed so that one can see the cumulative impacts of the proposals presented in the various alternatives.

87

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DIRECTOR'S OFFICE

September 20, 1993

Mr. Ron Sparks, Coordinator
Nevada State Clearinghouse
Department of Administration
Division of State Planning
Blasdel Building, Room 204
Carson City, NV 89710

RE: SAI NV#93300127

Dear Ron:

The Draft Tonopah Resource Management Plan (RMP) and Environmental Impact Statement are cause for concern about the wildlife resources of the area. Indications are that improved livestock management practices are in place; however, these practices are not addressed in this plan.

This RMP does not address the needs of the Tonopah Resource Area relative to the needs of the wildlife resources. Management direction is changing and must continue to do so to meet the needs of good land-use management. The preferred alternative, and other alternatives, emphasize commodity uses of all resources, rather than conservation or protection of resources. The actions occurring at this time regarding the Department of Interior and its new policies concerning grazing will modify this document.

Organization. It would help the reader to become familiar with the Affected Environment Section before the Alternative Plans are discussed in detail. References made to the Appendices, where important information is located, should be shared in previous sections of the Draft RMP. Greater attention to citing these appendices or even including the information within the various sections would be of value.

Quoting of regulation and manual protocol and procedure as a mainstay for how the RMP will be implemented makes for difficult reading. While the BLM may legally need to identify such procedures, its repeated use here clouds the issues. More

appropriate and specific information, such as standards and guidelines for appropriate use of vegetative resources, could be used to provide more meaning to the public in determining BLM management goals.

87-1 Use of References. There are no Allotment Management Plans, Herd Management Area Plans, nor Habitat Management Plans listed in the References section. How can the new, let alone the old, land-use plan be properly implemented? The only Activity Plan referenced was the Battle Mountain District's Fire Management Activity Plan. The activity plans that are currently in place should be listed with an implementation schedule.

ALTERNATIVES

87-2 1. Page 2-2, Management Determinations. The document fails to list pronghorn antelope along with bighorn sheep and Rocky Mountain elk. Also, under number 5, big game should only be reduced if it is determined to be the offending grazing animal.

87-3 2. Page 2-3, Number 4, Paragraph 5. The document does not state how utilization levels will be determined. If not averaged as in the past, how will utilization levels be determined which will trigger management actions to address the offending animal(s)?

87-4 3. Page 2-8, Alternative 1, Wildlife Habitat. Authorized bighorn sheep introductions and/or reintroduction/augmentations should be included.

87-5 4. Page 2-8, Alternative 1, Wildlife Habitat. No mention of ferruginous hawk (Category 2 Species) habitat or efforts to maintain or improve it are made. Upland game bird habitat should be maintained in a state that can sustain long-term populations. The augmentation or introduction of upland game bird species that are suitable for a particular habitat should be addressed in the RMP.

87-6 5. Page 2-9, Alternative 1. Deadwood harvesting on the entire resource area has potential negative impacts to nongame wildlife which use dead snags and deadfall habitats.

87-7 6. Page 2-14, Alternative 2, Wildlife Habitat 2c. What factors were used to establish this priority listing of HMPs?

87-8 7. Page 2-18, Alternative 2, Number 5. Why is there such a drastic reduction in the Railroad Valley Wildlife Management Area withdrawal? A review of page 2-20 would suggest that this reduction allow for the development of locatable minerals. What is the potential there?

87-9 8. Page 2-39, Alternative 4. Bighorn sheep releases should be specifically mentioned. The augmentation or introduction of chukar, sage grouse, mountain quail, Gambel's quail and blue grouse should be dealt with in the RMP.

87-10 9. Page 2-54, Standard Operating Procedures, First Paragraph. The distances to domestic driveways and/or trucking requirements according to recent BLM adopted guidelines should be included.

87-11 10. Page 2-54, Standard Operating Procedures, Last Paragraph. Does this include fencing of all developed springs, or those previously developed, also any new ones?

AFFECTED ENVIRONMENT

87-12 1. Wildlife distribution maps are not current or accurate. Biologists with the Nevada Department of Wildlife should be contacted for comprehensive information about various species of wildlife and their distribution.

87-13 2. Pages 3-1 to 3-3, Vegetation. The description of key or representative species for the various vegetation communities is ambiguous. There is an obvious bias to reference species important to livestock and feral equids. What happened to species important to wildlife? Is there competition among livestock, feral equids, and wildlife for species such as winterfat and 4-wing saltbush? Why are grasses such as ricegrass, galleta, needlegrass, bluegrass, etc., not mentioned here? Why were the Hot Desert, Black Greasewood, and Playa types not described? It is appropriate to consider much of the Tonopah Resource Area as "ephemeral" in classification. This would be consistent with a classification of Mojave biome ranges in Stateline Resource Area and would make management consistent throughout much of this habitat type.

87-14 3. Page 3-3, Wildlife Habitat, Mule deer. It is unlikely that 69% of the deer habitat study sites show a condition of good or better. Other data would suggest otherwise. Of 34 allotments in the RMP, 22 (65%) are Category I with resource conflicts high on 23 of 34 allotments. No allotments are listed in Appendix 8 as being in satisfactory condition, in fact, 12 are in unsatisfactory condition with the remaining 22 undefined. Again, it is questioned if the rating of good to excellent condition for deer winter ranges is reflecting the true situation. Mention should be made that deer winter range also exists on the west slopes of Timber Mountain and Yucca Mountain within this Resource Area. Also, deer from Nevada Test Site lands have been known to occur in the Bare Mountains/Beatty Wash area primarily in the winter/spring period. Low density deer populations exist along the Amargosa River and near water sources in the Bullfrog and Bare mountains on a yearlong basis.

87-15 The reporting of study site results is unsatisfactory in the RMP. It is difficult to interpret the significance of the ratings because distribution and locations of the study sites cannot be determined. Are they acceptable indicators of wildlife habitats, particularly in areas overlapped by livestock, feral equids, and people?

87-16 4. Page 3-4, Deer Winter Range. Are so few winter ranges identified because they are ill-studied, ill-known, or because human intrusion into the valleys may have affected a decline in use of historical winter ranges?

87-17 5. Page 3-4, Antelope. It appears that 67% of the range is in less than good condition. In fact, 65% are listed as fair and another 33% are listed in good condition. Recent information provided by BLM personnel suggest errors in methodology used to establish these condition class ratings. Since antelope inhabit most of the same areas as do domestic livestock and wild horses, it is difficult to imagine how the condition of their habitat can be better than that suggested for most of the allotments?

87-18 6. Page 3-4, Bighorn sheep, Last Paragraph. Seasonally, conflicts can occur with bighorn sheep. Cattle and horses compete for forage as well as water.

87-19 7. Page 3-4, Waterfowl. Waterfowl habitat also occurs in Big Smoky Valley and Big Fish Lake Valley.

87-20 8. Page 3-4, Raptors. A species list of all raptor species that either nest or seasonally use the Resource Area should be provided.

87-21 9. Page 3-6. The omission of Category 2 species from this document serves to dilute the importance of wildlife in the planning efforts of the BLM. There is nothing about pygmy rabbits, mountain quail, ferruginous hawks, chuckwallas, spotted bats or loggerhead shrikes; all of which can be found in this Resource Area. This document must address a baseline approach to collecting information and making users aware of the concerns regarding their particular situation and to help prevent any further detrimental impacts to their respective populations. This treatment would lead one to understand that wildlife equates to only raptors and game species. What of the effects of past and present management practices on nongame species? A listing of nongame species, furbearers, and neotropical birds should be included to make this document as complete as possible. Please reference the Federal Register, Vol. 56, No. 225, November 21, 1991, pp. 58804-58835. Additional information is available from the Fish and Wildlife Service, Nevada Ecological Services, for lists of species categorization by county, dated September 1992.

87-22 10. Page 3-5, Animals. Distinguish the desert tortoise as both a state and federally designated threatened species. High speed (>25 mph) roads and highways are threats to wild desert tortoises. Additionally, large portions of the Bonnie Claire Valley are being considered as an experimental tortoise relocation site.

87-23 11. The following are fish species found within the boundaries of the Tonopah Resource Area. Although some of these species are not currently present on BLM administered lands, the development of additional populations of these speceis on public land, either by acquisition or introduction into suitable habitats would be desirable:

Railroad Valley springfish	Federal Threatened
Amargosa toad	Federal C2
Oasis Valley speckled dace	Federal C2
Railroad Valley tui chub	Federal C2
Hot Creek Valley tui chub	Federal C2
Fish Lake Valley tui chub	Federal C2
Little Fish Lake Valley tui chub	State Sensitive
Big Smoky Valley speckled dace	State Sensitive
Big Smoky Valley tui chub	Federal C2
Monitor Valley speckled dace	Federal C2

87-24 12. Page 3-6, Riparian. Inadequate resource value descriptions are provided. Riparian areas, springs, seeps, etc., are critically important to wildlife, not just livestock and feral equids.

87-25 13. Pages 3-8/9, Forestry and Vegetative Products. The harvest of dead and/or downed trees in the Resource Area has potential impacts to many nongame species including mammals, birds, and herptiles that use this habitat for cover and nesting areas. For example, vegetation in various forms does not just provide habitat for these creatures, they hold the soil from excessive erosion, fertilize the soil and reinvest this material back into the soil. The elimination of dead wood harvesting is not advocated since certain amounts of deadwood harvest are beneficial to all wildlife. Yet nongame needs to be recognized, surveys need to be conducted to learn where these animals congregate, and, most important, why these animals are more abundant in some areas as opposed to others.

87-26 Only the previous five (5) years harvest data of forest products was reported. Does that mean records have only been kept for 5 years? What does sustained yield basis really mean? Why was only 71% of the identified sustained yield taken? Does that reflect demand or does it reflect avoidance of over-cutting in the greenwood cutting areas totaling 33% of the total operable P/J

areas? Also, if 141,000 acres of WSA are released to multiple-use, why are only 530 additional cords per year allowed for cutting? The current sustained yield of 1,185 cords annually is not too far off from the 1,375 cords per year projected should the WSAs be released. While not advocating greater utilization of firewood, why is the information presented as such?

87-27 14. Joshua Trees. How can sales or harvest be justified without a solid understanding of what the Joshua stands can tolerate in terms of sustained yield, particularly with a species on the northern fringes of its geographic range? Noncommercial harvest of Joshua trees has potential negative impacts to nongame wildlife. Many raptors and passerines use these trees for hunting perches, nesting and foraging. The loggerhead shrike (Category 2) uses the spines from the Joshua tree on which to pierce and cache its prey. In addition, some illegal harvest of Joshua trees is probably occurring as this is a valued ornamental plant and this needs to be addressed.

87-28 15. Page 3-9, Livestock Grazing Management. The indicated past five-year average actual use was 167,102 AUMs. If the initial stocking rate is to be 162,766 AUMs, this represents only a 2.6% reduction in livestock use. With no meaningful change in numbers, how can conditions be expected to change for the good? Allotment evaluations show current levels of use and management have not, and will not, allow for achievement of allotment objectives. During the allotment evaluation process, it was determined that practically every allotment in the Tonopah Resource Area is in less than satisfactory condition. The Nevada Department of Wildlife agreed with that assessment. However, this RMP will not cause the necessary changes in management to achieve allotment objectives. Guidelines for vegetative condition and utilization levels allowed under BLM management guidelines should be incorporated.

87-29

87-30 16. Page 3-9, Wild Horses and Burros. This section references the planned introduction of bighorn sheep into the Bare Mountains. This release was made in October, 1991. Bighorn sheep do not conflict with burros, but the opposite is the case.

87-31 17. Page 3-9, 1st Paragraph, last sentence. What substantial influence on rangeland conditions have range improvement projects and grazing practices had, beneficial or destructive, to base resources? Are there no conflicts among livestock, deer, feral equids, and pronghorn? In particular, why is it that pronghorn habitat is in such marginal condition? Is it solely because of lack of water sites? Perhaps past forage depletions and watering area decay due to grazing practices also play a significant role. There currently is equid use outside identified Horse Management Areas. Burros in tortoise habitat may be contributing to

undesirable habitat conditions; if there is no data, there should be no indication that there is no concern. Perceptions emerge which suggest equid management in harmony with ecological balance is weighted in favor of the equids. Should this perception be the case, then the objectivity regarding the concept of ecological balance as proposed by BLM is questionable.

ENVIRONMENTAL CONSEQUENCES

87-32 1. Page 4-2. Potential illegal Joshua tree harvest needs to be addressed. Refer to Affected Environment, Forestry and Vegetative Products.

87-33 2. Map 4-5. The vegetation types depicted are too general. The hot desert is listed as a vegetation type. Does this include Joshua tree, creosote bush or black brush communities? The inclusion of transition areas on the maps would clarify vegetation types.

87-34 3. Page 4-4. Why does sage grouse habitat continue to be adversely affected? Livestock management will not change with any of the alternatives according to page 2-5. Throughout the document, improved riparian habitats is a stated objective. Sage grouse, their status and historical distribution are a major concern. No mention of this species is made for Esmeralda County and little data is available for distribution within the county. Sage grouse habitat exists in a marginal condition on the Silver Peak, Magruder, Palmetto and Stonewall mountain ranges. Scattered observations of sage grouse or sign have been made on all of these ranges in the past 22 years.

Strutting sage grouse were found on BLM lowlands near Chiatovich Creek and birds were observed on Indian and Davis creeks during the spring when strutting was in progress. NDOW estimates submitted to the Bureau of Land Management in 1975 for the Esmeralda URA report, showed an estimated population of 4,000 sage grouse. Field data collected by the Department during the past ten years has shown a substantial decrease in this population. Land disposal and vegetation manipulation practices need to address available sage grouse guidelines.

87-35 4. There is no treatise on upland bird habitats, neither Gambel's or mountain quail, nor chukar. It is appropriate that a candidate T&E species is afforded mention in the RMP since their habitats have been affected by year-long livestock grazing. For the short-term (past 4-5 years) mountain quail populations have improved in distribution and the above map should be extended to include all of the Palmetto Mountains.

87-36 5. Page 4-7. If additional waters are to be developed and fenced, why not fence existing developments as well? Without protection of the source, longevity of the development is questionable.

87-37 6. Map #19. Riparian areas and sensitive species habitat are indicated. Upper Tule Canyon (Magruder Mountain) should be considered an important riparian area on this map. In the 1950's and 1960's riparian communities were much more extensive in upper Tule Canyon; but, mining activity impacted most of the willow in upper portion of this area. With vegetation manipulation and livestock management this could be a riparian area again. The riparian areas at O'Hara Spring, Cucamunga Spring, Alum Creek, Log Spring, Birch Creek and Railroad Spring should all be considered for rehabilitation.

87-38 7. Page 4-8, Impacts to livestock grazing from wildlife habitat management. What impact has the closure of Morey Bench and Toiyabe Bench had to livestock grazing? No AUM's were lost as a result of the Toiyabe Bench closure. How is it known with any degree of certainty that the needed management practices to benefit resources will be carried out if they are not identified in the Draft RMP?

87-39 8. Page 4-8. The reasonable numbers concept for wildlife populations has been dropped by BLM. "Monitoring" is to be the methodology employed. Why is it assumed that antelope increases would necessarily have a negative impact on grazing management? Where have antelope been shown to be such a problem in Nevada?

87-40 9. Page 4-43. Most wildlife will not necessarily benefit from the development of wells since they will only provide water as long as livestock are in the area. When they are removed, these wells are no longer pumped, leaving wildlife without the water they have become accustomed to.

87-41 10. Page 4-46. If this alternative is the most resource oriented, why then are spring sources not considered for protective fencing, especially those that have been developed?

87-42 11. Page 4-59 & 4-60. Why the closure south of Hot Creek Canyon? Most of the deer winter/spring use is north of Hot Creek Canyon.

87-43 12. Page 4-69. Allow for wildlife population increases according to land use plan objectives. Does this mean that reasonable numbers are the objective? In alternatives two and three, wildlife objectives were for numbers compatible with carrying capacities. If monitoring is the basis for livestock adjustment, it should also be used to determine wildlife numbers.

87-44 13. Page 4-71. Where is the 23,160 acres of important wildlife habitat that is proposed to be opened to mineral leasing?

14. Page 4-73. Spring developments need to be protected from the trampling of domestic livestock and horses. The standard operating procedure outlined on page 2-54 says this will be done, and it doesn't discriminate between new and old developments. Water should be provided at the source of any development, in accordance with Nevada Revised Statutes. 87-45

87-46 15. Page 4-76. Why is so much land proposed for transfer out of federal ownership? The acreage involving Smoky Valley seems to far exceed any possible demand for the future. Artesian wells offer excellent habitats for refugia populations of Nevada sensitive fishes. There is also excellent potential for native fish habitats created by current oil/gas and geothermal projects. Fish Lake Valley is an example. The disposal of lands should not be allowed if sensitive species occur on them. For example, a potential disposal site is at Twin Springs, where a population of the Hot Creek tui chub may occur on public land.

87-47 16. Page 4-78. Reference is made to a discretionary disposal of 10,000 acres in the Stonecabin Horse Management Area. Is the intent here to offer this land to one or both of the current permittees to perpetuate their operations and offset the impact of recent reductions in AUM's? On page 4-70, land disposal is mentioned, it is not quantified; however, on page 4-78, it is. A total of 39,785 acres is listed for vegetation manipulation. Since the numbers of acres add up, one can assume that disposal acres and vegetation manipulation acres are the same. The RMP goes on to talk about what are to be seedings for the benefit of livestock grazing. Why must we continue to convert our rangelands to an artificial situation?

87-48 17. Page 4-87. Again, why must we remove the existing protection afforded to some important wildlife habitat areas by current closure? Is this to allow exploitation of these areas?

87-49 18. Further, it is suggested the number, pattern, and width of corridors be further evaluated with the recommendation that double circuit towers for electrification routes be used to reduce the areas affected. Also, regarding pipeline routes, corridors should be narrowed to avoid excessive and unnecessary destruction and fragmentation of surface resources.

APPENDICES

87-50 1. Appendix Number 5 is troubling from at least two perspectives. The first is the amount and location of acres proposed for vegetation manipulation. The second involves the

proposed construction of 849.2 miles of new fence. A couple of valleys are proposed for well over 100 miles of fence (Reveille-140 miles). Whatever happened to cost/benefit analysis? This may be a large amount of fencing, at great expense, for the benefit of a few permittees. How much is highway right-of-way fence?

87-51 2. Appendices 6 & 7 indicate the initial stocking rates for the RMP. The addition of the livestock AUM's gives a total of 165,672 AUM's, not the 162,766 AUM's indicated throughout the text. This represents a 0.86% reduction from the past 5-year average actual use of 167,102 indicated on page 3-9. With no change in stocking rates and no mechanism in place to send cows home when proper use is reached, there is no way that improvement in range condition can occur. When will an actual reduction in numbers take place? Again, the Livestock EIS should be tiered to this document with standards and guidelines for range utilization under a variety of conditions. 87-52

87-53 3. There have always been problems with the lack of justification for cultural resource management and the restrictions associated with it. All other resources are held accountable regarding levels of protection and how they must be compromised with other resources. For example, it is not asked that every passerine bird nest be identified and protected. This could be done for the sake of a limited and unique resource, such as neotropical birds, but is not done because justification or evidence to support such a request is lacking. The same should be true for cultural resources.

Thank you for the opportunity to comment upon this proposed action on the public lands of Nevada. If you have any questions or require additional input, please advise.

Sincerely,

David K. Rice
Acting Director

COP:jln/jk/el

88

DIVISION OF
STATE LANDS

Nevada State Clearinghouse

'93 JUL 23 P3:15

Department of Administration
Budget Division
Blasdel Bldg. Rm. 204
Carson City, Nv. 89710
687-4065

	ADMIN.	
	PL III	
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	LA II	
	LA I	
	TECH	
	FORSTR	
	TAHOE	
	MA	
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DATE: July 22, 1993

TO:

____Governor's Office
____Agriculture
____Colorado River Cmsn.
____Communications Bd.
____Community Services
____Economic Development
XXX Fire Marshal
____Human Resources
____Aging Services
____Health Division
____Health Protection

____Legislative Counsel Bureau
XXX ____Minerals
____Nuclear Projects Ofc.
XXX PSC
____Tourism
____Transportation
____UNR Mines Bureau
____UNR Library
XXX Wild Horse Commission
XXX ____Wildlife
XXX Natural Heritage

Conservation-Natural Resources:
XXX Director's Office
XXX State Lands
XXX Environmental Protection
XXX Forestry
XXX Historic Preservation
XXX Conservation Districts
____State Parks
XXX Water Resources
____Water Planning

Nevada SAI #93300127 Project: EIS, Tonopah Resource Management Plan, Nye

CLEARINGHOUSE NOTES:
Attached, for your review and comment, is a copy of the above mentioned project. Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than September 27, 1993. Use the box below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

____ No comment on this project
XXX Proposal supported as written
____ Additional information below
____ Conference desired (See below)
____ Conditional support (See below)
____ Disapproval (Explain below)

AGENCY COMMENTS:

Recommend consideration be given in the use of solar power pumping systems for the movement of water away from springs and riparian areas when there is a need to provide water for horses, wildlife and livestock.

RECEIVED
AUG 1 8 1993
DEPT OF ADMINISTRATION
DIRECTOR'S OFFICE

Signature [signature] Date 8/17/93

89

Nevada State Clearinghouse

RECEIVED
ENVIRONMENTAL
PROTECTION
93 JUL 23 PM 2:

Department of Administration
Budget Division
Blasdel Bldg. Rm. 204
Carson City, Nv. 89710
687-4065

DATE: July 22, 1993

TO:

____Governor's Office
____Agriculture
____Colorado River Cmsn.
____Communications Bd.
____Community Services
____Economic Development
XXX Fire Marshal
____Human Resources
____Aging Services
____Health Division
____Health Protection

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Conservation-Natural Resources:
XXX Director's Office
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____Water Planning

Nevada SAI #93300127 Project: EIS, Tonopah Resource Management Plan, Nye

CLEARINGHOUSE NOTES:
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____ No comment on this project
____ Proposal supported as written
____ Additional information below
____ Conference desired (See below)
____ Conditional support (See below)
____ Disapproval (Explain below)

AGENCY COMMENTS:

Specific waste management issues will be dependent upon specific uses in economic development alternatives.

If contamination above federal or state standards is present it must be reported to the NEDP and DEM. Such contamination may require remediation.

RECEIVED
AUG 2 3 1993
DEPT OF ADMINISTRATION
DIRECTOR'S OFFICE

Signature [signature] Date 8/20/93

David Cowperthwaite

90

DOLAR OIL PROPERTIES
9035 South 700 East
Sandy, UT 84070-2418
(801) 561 - 3121

September 23, 1993

Mr. Tom Leshendok
Nevada Bureau of Land Management
United State Department of the Interior
850 Harvard Way
P.O. Box 12000
Reno, Nevada 89520-0006

Re: Tonopah Resource Management Plan
and Environmental Impact Statement

Dear Mr. Leshendok:

On August 9, 1993, I had the opportunity to visit with members of the Bureau of Land Management staff concerning the Tonopah proposed Resource Management Plan and Final Environmental Impact Statement. As I had stated in the meeting, it is very important to our industry to have the opportunity to review the proposal during the comment period, because the contents of the final approval will directly affect the amount of drilling activity the area will receive from the oil and gas community.

The plan set forth by the Tonopah Resource Area Office does seem to be fairly complete, and should allow for "public use" of said lands, however there are some topics which warrant consideration for change prior to final approval, and we would appreciate your consideration of these comments prior to acceptance of the final draft. My review of the plan comes from an industry standpoint with extensive experience in permitting wells and obtaining right-of-way accesses before, during and after an Environmental Resource Management Plan is completed, I have witnessed several problems occurring which could have been solved if addressed prior to accepting the documents.

Since the "draft" allows for a preferred plan (Alternative 4), most of the comments made herein will be made in accordance with that plan. Although, from a standpoint from public use advocates, the existing management plan (Alternative 1) does seem to suffice for the

needs of the region, and should be considered as a reasonable management plan.

The comments of Alternative 4 which we would like to address are as follows:

Page 2-41/Cultural Resources:

Since the Trap Springs-Gravel Bar complex is located within the Trap Springs field area, it is evident the entire region will receive an Archeological Study through individual permits by existing operators. It would seem to serve to the benefit of industry and the BLM to arrange for this region to be reviewed in its entirety, and then be released from the "withdrawn area" of the ACEC outline once the research program has been concluded. This matter was discussed in our meeting as an attractive alternative, and including language to this affect in the Resource Management Plan would better define the release of the ACEC when it occurs.

If this proves to be successful, the other ACEC areas could be effectively addressed in using the same process.

Page 2-43/Lands and Rights-of-Way:

90-1 A major problem exists between the proposed land corridors (Exhibit Page - Map 28) and the Right of Way Avoidance Areas (Exhibit Page - Map 30) and Off-Road Vehicle Restrictions (Exhibit Page - Map 51). Since several leases have been issued in this area with full occupancy in the areas of Townships 1-3 North, Ranges 51-53 East, a determination must be addressed to honor existing lease stipulations (or lack thereof) or the restrictions proposed in the accepted Alternative. With the remote roadway accesses in this region, drilling and development of the issued lease will require access to from the locations and existing roadways.

90-2 It should also be clarified if leases issued prior to the approval of this Resource Management Plan is subject to the RMP, or the lease stipulation currently attached to the governing lease(s). We have found Districts throughout the Rocky Mountain region to vary greatly concerning this policy.

90-3 It is not specifically defined in the Utility Corridor outlines (Exhibit Page -Map 28) is to include oil and gas pipelines. It will be necessary for this to be defined in the final draft of

the RMP so the matter will not have to be address after production is established and a pipeline right-of-way is attempting to be permitted.

Map 53- Fluid Mineral Potential

The companies which I represent have a tremendously different view of the "high" levels of potential than listed on the map. This may not seem to be seem to be much of a problem with the District, since the map in on page 53 is speculative. However, past experience with the Moab District (in Southeastern Utah) attempted to define potential in the same manner four years ago when it completed its RMP. However, drilling proved that an are mapped "non-speculative" became the largest play in the District, and the District had allowed to drilling to occur in their highly defined areas, and limits were placed on the areas of so-called low potential.

In using the Moab District as an example, we suggest the entire Railroad Valley region (T1N-T9N, R51-58E) be listed as "1H", an area of high potential.

Page 4-93/Reasonably Foreseeable Development Scenario for Oil and Gas:

The final comment that needs to be made is concerning the "foreseeing future" for exploration in the region. The state of Nevada is considered by most explorationists as the last frontier for the discovery of multi-billion barrel oil fields within the continental United States. With the advanced technology of the last decade, the oil and gas industry is now looking at Nevada with a different, more sophisticated point of view. Should one field capable of producing equal to Trap Spring be discovered in the next year or two, the Tonopah District should except, and plan for processing 100 permits to drill a year rather than the 30 wells in 15 year scenario set forth in the RMP projects.

The purpose for this to be considered in this plan is primary for the benefit of the having access to employ the number of individuals necessary to process the paper work which is filed in drilling wells, obtaining archeological approval, and permitting accesses for marketing of products. In considering this comment, please keep in mind many major oil and gas companies have discontinued operations in the United States because the "unforeseeable" bureaucratic controls, and lack of prompt actions on the part of BLM, make domestic development unattractive and uneconomical for pursuit.

For the most part, the draft for the Tonopah Resource Management Plan proposed herein set forth a well organized and prepared plan for the continued use of the public lands within the District. However, the comments herein are being addressed in an attempt to provide assistance and constructive criticism from the stand point of an industry member who spends most of his timely filing documentation in accordance with existing plans in other districts.

The opportunity to address this matter is appreciated.

Sincerely yours,

DOLAR OIL PROPERTIES

Mark S. Dolar, CPL

91

The Nature Conservancy

NORTHERN NEVADA PROJECT OFFICE 1885 South Arlington, Suite 1 Reno, Nevada 89509 (702) 322-4990 FAX (702) 322-5332

1 October 1993

RMP Comments

Mr. Ted Angle, Area Manager
Bureau of Land Management
P.O. Box 911
Tonopah, NV 89049

Dear Mr. Angle:

The Nature Conservancy is pleased to provide the following comments on the Tonopah Resource Management Plan and Environmental Impact Statement. We recognize the effort that has gone into drafting this important management document that covers more than six million acres of Nevada's public lands and struggles to balance potentially conflicting uses under multiple-use and sustained yield mandates.

In general, we are disappointed that this draft plan does not embrace recent commitments by the BLM to consider biodiversity and ecosystem management as valid components of multiple-use and sustained yield principles. Several Bureau-wide policies and plans, such as, BLM Fish and Wildlife 2000, BLM Riparian-Wetland Initiative for the 1990s, and BLM Range of Our Vision, appear to not have been incorporated into the rationale of this document. The preferred alternative was selected because it "provides for the development of renewable and non-renewable resources, while ensuring that the preservation and enhancement of fragile and unique resources will occur." We contend that when the figures are added up the preferred alternative actually ensures preservation and enhancement of a very small percentage of the fragile and unique resources within the Tonopah Resource Area.

We acknowledge that private economic development and economic diversity are important components of multiple-use and sustained yield principles. However, we believe that they can and should be balanced without having to sacrifice unique biological assets upon which the health of our environment and our own well-being are inextricably dependent. We support and commend the nomination of three areas of critical environmental concern directed at protecting special status species. Still, the biological diversity dependent upon BLM stewardship requires greater protection and management than that proposed in this draft RMP and EIS.

91-1 One difficulty with the RMP is that recent (1-2 years old) biological information appear to not have been used for the assessment. The Nevada Natural Heritage Program should be consulted for more recent special status species information and

GREAT BASIN FIELD OFFICE Pioneer Station PO Box 11486 Salt Lake City, Utah 84147-0486 (801) 531-0988
WESTERN REGIONAL OFFICE 2060 Broadway, Suite 230 Boulder, CO 80302 NATIONAL OFFICE 1815 North Lynn Street Arlington, VA 22209

the list of high priority conservation sites in the resource area. There are at least one category 1 candidate plant and three category 2 candidate animals missing from the tables.

Regarding one of our most important concerns—special status species—the objective of the preferred alternative is to protect, restore, enhance, and expand their habitat. Yet, on close inspection the draft RMP provides for little this. Perhaps the best tool available to BLM to protect special status species and their habitats is to provide the special ACEC designation. Of the 29 candidate species noted in the RMP, only three (2 animals and 1 plant) would receive formal protection and management from ACEC nominations. How are the other 26 candidates going to be
91-2 protected? Will they have to be listed as threatened or endangered before action is taken to prevent their loss? Proactive measures, such as ACEC designation and subsequent ecosystem management, would save much over the alternative of individual species-level listings and recovery activities.

91-3 Recreation at the Clayton Valley Dunes and Crescent Dune areas appears to be given high priority, with no regard to the need to protect unique candidate animals occurring in the dune environment. Impacts to these special status species by dune buggy enthusiasts are not addressed.

The preferred alternative objective for riparian areas is weak given their stated importance to wildlife, human use and enjoyment, and healthy ecosystem functioning. The current conditions of most riparian areas are not satisfactory and planned management and monitoring falls short of correcting the problems within a reasonable timeframe. Independent impacts from livestock grazing, recreation, and mineral exploration and development are inadequately addressed, and therefore, cumulative impacts are deficient as well. We feel that inventorying the riparian areas associated with seeps and springs should be given high priority as a first measure toward appropriate management in those areas. We support the acquisition of private acreage in the Amargosa Oasis riparian area and Lockes Ranch. We have been working along those lines ourselves and offer our assistance in that endeavor.

Another rough measure of the lack of adequate protection of unique biological resources is a comparison of the acreages nominated for special management (ACEC designation) versus the acreage left to other multiple uses. Acreage in the ACEC nominations that would protect four special status species amounts to 0.5 percent of the total resource area. In comparison, livestock would be excluded from 12,199 acres—in other words, 99.8 percent of the total resource area would remain open to grazing. At least 89 percent of the resource area would remain available to various mineral exploration and development activities.

In closing these general comments, we encourage you to incorporate recent stronger BLM policy to protect biological resources into the final document. We hope that these comments are helpful in the preparation of the final RMP. Thank you for the opportunity for input.

Sincerely,

Jan Nachlinger
Nevada Protection Planner

cc: Dave Livermore, TNC/GBFO

92

18 Pinecrest Ave.
Lynnfield, MA 01940
September 29, 1993

RMP Comments
Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, NV 89049

Dear Resource Area Manager:

I am writing to urge you to **accept Alternative 3** of the Tonopah Area Resource Plan as it pertains to Rhyolite.

The ability to purchase private lands is critical to the preservation of Rhyolite. The train depot, in particular, was and is one of the townsite's defining landmarks: any of the other alternatives would not allow for its eventual purchase and preservation.

Rhyolite is a relatively untouched part of the area's past, one I have enjoyed and marveled at each time I have visited Death Valley (seven times). Each time I return, however, I notice a little more decay, a little more vandalism, a little more intrusion by the mine nearby. Alternative 3 allows the mine to retain its property and interests, but at least allows the possibility of a land swap once the mine is no longer profitable.

As a former California resident, an anxious visitor to the area, and a federal taxpayer, I urge you to accept **Alternative 3, not 4**. Thank you.

Sincerely,

Kenneth J. Carangelo

93

White Mountain Ranch

P.O. Box 88
Highway 264
Dyer, NV 89010

(702) 572-3300 (Headquarters)
(702) 572-3262 (Operations)
(702) 572-3232 (Shop)

October 1, 1993

Bureau of Land Management
Tonopah Resource Area Manager
P.O. Box 911
Tonopah, Nevada 89049

ATTENTION: RMP Team for the
Tonopah Resource Management Plan
and Environmental Impact Statement

RE: RMP COMMENTS

Ladies and Gentlemen;

Thank you for giving me the opportunity to comment on this draft plan.

Because I am new to this area, I can only represent in the limited time available a few fragments of ideas. I would hope there is additional time allotted by the BLM for constructive dialogue on this RMP prior to its adoption.

With the new administration in Washington, the public and local affected citizens have found aheightened awareness of Public Land Planning. Consequently, additional time for dialogue under these new set of circumstance would be valuable to the whole planning process.

The great American leader and one of our county's greatest planners, Dwight D. Eisenhower, said of planning: "the 'plan' is nothing.....but 'planning' is everything".

That a discrete RMP is adopted or revised every few years, is an awkward manifestation of the need to plan for use of public lands. More important could be the process we are engaging toward achieving the BLM and public mission of "Responsibility in stewardship of our Public Lands".

To this end, I strongly recommend that the RMP Team continue an active "planning dialogue" with responsible citizens, entitlement holders and interest groups, not only during the finial 12 months before plan adoption, but continuously thereafter. To this end I also strongly recommend that the local BLM Management reach out for new ways to communicate with all parties thru creative new facilities, such as focus group work shops, field trips, reward thru public notoriety of land & environmental stewardship in both public and land entitlement holders; actively support joint planning sessions with county government and regional associations.

With the current tide of sentiment swinging toward "planning", it is an excellent time to put in place much needed planning tools.

We don't need another out of date plan; we need to all become better planning facilitators and to use the currency of planning upon which to more effectively settle the day to day matters before us.

I respectfully submit these few brief comments with the hope that there is room for a more meaningful planning dialogue in the future.

Sincerely,

James R. Boyce
President

RMP COMMENTS

CHAPTER 1 - INTRODUCTION

Purpose & Need

1. This RMP seems to achieve the same stagnation that it attempts to alleviate in the 1986 plan: The draft is out of date, as will be your 1994 adopted plan.
   You (we) don't need another fossilized plan: You (we) need better planning & management, tools, and a focus on planning, not a plan.

2. There is no real constructive planning dialogue in this effort: BLM authors simply distill their best efforts in to the "Draft RMP"; the public reacts positively negatively, or in most cases not at all because the process is intractable. Point, counterpoint, end of exercise.

3. The weaknesses of this effort are summarized:

   a. Many assumptions based on inaccurate information (eg. wild horse & burro herd management areas as of 12/15/71, the operative date).

   b. No public/private committees to verify base data.

   c. No facilities to update and communicate planning products on a time continuum.

CHAPTER 2 - DESCRIPTION OF ALTERNATIVES

1. Alternatives 1-4 seem to wonder aimlessly, with loosely connected concepts.

2. There in no "Land Planning"; no collective public "Land Plan".

3. The document does not reflect "Public Roads" or prescriptive easements.

4. There is no documentation of private vs public water rights or utilization.

5. Table 2-A. "Initial Herd Size" is dramatically incorrect for Fish Lake Valley and Silver Peak HMA's.

6. Any references to "Riparian Habitats" <u>must</u> state that any BLM plans for activity in designated areas is subject to adjudicated, vested and other prior rights of private and entitlement holderss under Nevada State Statutes.

7. Page 2-28, 2-43, "3. Acquire private lands....Fish Lake (600 acres),.....".
   Delete any such reference to "Fish Lake (600 acres)" because it is not under consideration by the owner, White Mountain Ranch.

8. "Riparian Habitat", all alternatives and references on pages 2-9, 2-15, 2-25, and 2-40: Every reference to "Perry Aiken Creek" Management of any form what so ever is subject to prior rights of use granted to James and Christine Boyce dba White Mountain Ranch Under 1878 decrees, prescriptive right of ways and other state of Nevada permits & certificates of utilization.

   However, as point of reference, the entitlement holders to this creek's utilization have an interest in discussion with the BLM to achieve (and perhaps exceed) BLM objectives thru cooperative utilization rights together with a Hydorelectric Development plan.

CHAPTER 3 - AFFECTED ENVIRONMENT

93-1 1. Summary of stream Habitat in the Tonopah Reserve Area, pg. 3-8, Perry Aiken Creek: "Brown Trout" (not Rainbow). HOWEVER ! These fish exist "upstream" and to the west, one or more miles beyond the boundary of the BLM property (i.e. in the US Forest Land).
The opportunity exists to build appropriate habitat for the Brown Trout, as per the previous comment, in cooperation with the Perry Aiken Creek utilization entitlement holders.

93-2 2. Table 3L: Esmeralda Co. growth 80 to 90 was 73% . It does not follow that growth 90 to 95 would be 1.9% (as shown). Probable growth of 30%, or a total of 1,750 growth would be realistic.

93-3 3. Table 3M: Esmeralda agriculture is not correct (was at least double this number) and does not match with pg. 3-28 showing agriculture at minimum of $4.8 million.

CHAPTER 4 - ENVIRONMENTAL CONSEQUENCES

1. General Comments: Appear unfocused and with various consequences unweighted and not leading to overall conclusions based on unstated performance or evaluation criteria.

CHAPTER 5 - CONSULTATION AND COORDINATION

1. General Comments: Coordination with Esmeralda County Commissioners is particularly weak due to major changes in private and public leadership there. Consider heavy coordination during the final 12 months with responsible individuals & groups of the county.

2. List of prepares & reviewers should include private interests, consultants and focus groups.

3. On going planning efforts. No facilities have been provided to support the continuous BLM/Private Planning efforts needed.

APPENDIX 7 - CURRENT FORAGE ALLOCATIONS-ESMERALDA

1. "Initial Herd Sizes For Wild Horses & Burros": The numbers stated here for "natural thriving ecological balance "are inaccurate by 3 to 4 times in excess based on two factors:

   a. The HMA's (shown on Map 23) are vastly incorrect for the 12/15/71 enabling date.
   b. The numbers shown reflect access to private water resources (on private deeded land) during the past census periods. Furthermore, water sources available on public lands has been easily destroyed by the

   census' documented (case in point, Minnesota Springs in the Silver Peak Allotment).

APPENDIX 9 - METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

1. General Comment: This formula should be carefully reevaluated with range land entitlement holders and other informal parties. Western Range Services "Monitoring" Plan for Esmeralda County is a superior basis for balancing active preferences and wild life ecological balances.

MAPS: GENERAL

1. While several of these maps 1-64 contain errors, many contain obscure graphic indexes, BLM designations of Management policies that juxtapose private deeded property.

2. I would like the opportunity to conference with the RMP Team to review several map inconsistencies. Because the maps are two large to submit with this set of comments I only summit a partial example for Map 23.

MAP 23: HMA BOUNDARIES

93-4

1. The attached exhibits reflect testimonials (pre-affidavit form) for the 12/15/71 HMA boundaries. These reflect a major difference with extent and the then "Natural Thriving Ecological Balance" for the Fish Lake Valley and Silver Peak HMA's.
For establishment of accurate base line data, this map needs a major overhaul, preceded with numerous testimonials. The significance of accurate data in this area cannot be overstated.

RESPONSES TO RMP PUBLIC COMMENT

This section provides BLM's response to the public comment letters received post marked by the close of the public comment period which ended on October 1, 1993. Response is provided to substantive comment statements which were concerned with facts or analysis, or commented on issues discussed in the Draft RMP/EIS. A response was not developed for every letter, therefore, gaps in the letter numbering sequence do exist.

LETTER 1 - BLM, CARSON CITY DISTRICT, WALKER RESOURCE AREA

1-1 The right-of-way corridor adjacent to Nevada State Highway 6 was identified in the *Esmeralda-Southern Nye RMP Record of Decision, 1986*. The corridor is also identified in the Western Regional Corridor Study. Industry indicated a need for the corridor during preparation of the Draft RMP/EIS.

1-2 Map 16 in the Proposed RMP/Final EIS (formerly Map 20 in the Draft RMP/EIS) has been modified as suggested.

1-3 Map 16 in the Proposed RMP/Final EIS (formerly Map 20 in the Draft RMP/EIS) has been modified as suggested.

LETTER 2 - DONALD L. WOLBERG

2-1 In accordance with 40 CFR 1502.15 the description of the affected environment should be no longer than is necessary to understand the effects of the alternatives.

2-2 An expanded discussion of known paleontological resources in the Tonopah Resource Area is presented in Chapter 3. In addition, as stated in the Proposed RMP the existing Class I paleontological survey of the Resource Area will be updated.

2-3 An assessment of the significance of paleontological resources in the Resource Area, and recommendations for managing those resources is the intended outcome of a Class I survey.

LETTER 3 - RUBY LINGELBACH

3-1 See response to 2-2.

LETTER 4 - DAN LINGELBACH

4-1 Paleontological resources in the Resource Area are managed in accordance with the Code of Federal Regulations (CFR). Collection of common invertebrate fossils and petrified wood may be undertaken without a permit pursuant to 43 CFR 3622 and 8365.1, and petrified wood may be sold. Petrified wood sales are conducted under the provisions of the Material Sales Act and 43 CFR 3610. Vertebrate fossils may only be collected under permit, and these permits are only issued to bona fide scientific researchers and institutions. The collection of vertebrate fossils without a permit, or

the collection of any fossil, except petrified wood, for commercial purposes, constitutes unauthorized use and violations are dealt with under the appropriate statutes.

4-2 The Proposed RMP/Final EIS makes no designations which would limit collection by rockhounds.

LETTER 6 - RICHARD C. DAVIS

6-1 The Proposed RMP/Final EIS modified the Preferred Alternative in the Draft RMP/EIS relating to the closure of portions of the Resource Area to OHVs. Those areas identified as "Closed" are changed to "Limited to Existing Roads and Trails". In these areas there will be no restriction on acceptable mineral exploration or development activity conducted under a mining notice or plan of operation, including OHV use necessary and reasonably incident to that activity.

A short section of road in Railroad Valley known as the Gravel Bar Road is the only road designated as closed in the Proposed RMP/Final EIS.

6-2 Error noted. Class 5 on Map 31 in the Proposed RMP/Final EIS has been revised to read "Competitive Events Limited to Roads, Trails, and Washes."

6-3 See response to 6-1.

6-4 See response to 6-1.

LETTER 7 - MAKOIL INC.

7-1 The Proposed RMP/Final EIS were prepared in accordance with 43 CFR 1601.0-6 which states "wherever possible, the proposed plan and related environmental impact statement shall be published in a single document."

7-2 Makoil Inc. is on the mailing list and was sent an invitation to participate in the scoping process for the Tonopah RMP on February 13, 1990.

7-3 Economic impacts of the Proposed RMP/Final EIS are stated in Chapter 4. The RMP will be implemented as funds become available.

7-4 Valid existing rights would be recognized subject to existing lease stipulations. Development of valid existing rights will be continued.

7-5 No Surface Occupancy (NSO) restrictions are primarily applied where surface development would have adverse impacts to important wildlife resource values, not cultural values.

7-6 Valid existing rights attending existing leases will be recognized. Restrictions would apply to new leases and existing unleased areas.

Access roads necessary for exploration and development of leased areas will be allowed, however, certain areas are designated as "limited" where seasonal restrictions

do apply. The Railroad Valley ACEC will be limited to existing roads and trails.

7-7 See response to 7-4.

7-8 The NSO areas contain wetlands which support a resident and migratory waterfowl population and the federally listed threatened Railroad Valley Springfish. Trap Springs is not part of the 3480 acres being considered for NSO, and has not been designated as habitat for threatened or endangered species.

7-9 The Trap Springs site complex (CrNV 61-220) is eligible for inclusion in the National Register as a district. Cultural materials found in the area are examined on an individual basis to determine if they are contributing or non-contributing elements to the district.

7-10 Direction for this policy is found in the National Historic Preservation Act (as amended, 1992), Section 110(a) (2) (B).

7-11 In accordance with 43 CFR 1610.5-5 an amendment shall be initiated by the need to consider monitoring and evaluation findings, new data, new or revised policy, a change in circumstances or a proposed action that may result in a change in the scope of resource uses or a change in the terms, conditions and decisions of the approved plan.

7-12 Public participation in the RMP process followed procedures outlined in 43 CFR 1600. Procedures for protesting the Proposed RMP/Final EIS are described in this document. In addition, opportunity for protest and/or appeal is also available as the decisions are implemented.

7-13 No existing mineral material resources in the Trap Spring Field are adversely affected under Determinations identified in the Proposed RMP/Final EIS.

7-14 See response to 7-3.

7-15 Information on implementation is included under the section of the Proposed RMP/Final EIS entitled "RMP Implementation, Monitoring, Evaluation and Maintenance."

7-16 No NSO restrictions apply to the Trap Spring/Gravel Bar areas. The 3,480 acres of NSO refers to the Railroad Valley ACEC which protects important wildlife resource values.

7-17 See response to 7-12.

LETTER 8 - NORA

8-1 The BLM's wilderness inventory finding for WSA status for Lone Mountain, Unit Number NV-050-0317, and the decision on wilderness study area designation, was published in the *Wilderness Study Area Decisions Report* (November, 1980). The final decision was to drop 38,239 acres from further wilderness consideration and zero acres were designated as WSA.

8-2 The NORA Big Book does not provide quantifiable data upon which to base management decisions and was therefore not used.

8-3 Public lands containing aquatic habitat in the Amargosa-Oasis drainage are part of the proposed Amargosa-Oasis ACEC. *Cyprinodon nevadensis* is not known to occur in the Resource Area.

8-4 All acres for disposal must be identified in the Proposed RMP/Final EIS. In addition, all disposals must meet the criteria identified in FLPMA (see Standard Operating Procedures section), and are subject to an environmental analysis as required by NEPA.

8-5 Approximately 14,000 acres at Crescent Dunes were examined for ACEC potential and did not meet the criteria for importance as described in BLM Manual 1613.

8-6 Approximately 9,600 acres in the area known as Big Moly were examined for ACEC potential and did not meet the criteria for relevance, or importance as described in BLM Manual 1613.

8-7 Approximately 2,500 acres in Brickyard Canyon were examined for ACEC potential and did not meet the criteria for importance.

8-8 Approximately 4,800 acres known as the Monocline-Crater were examined for ACEC potential. Monocline-Crater did not meet the criteria for relevance, or importance.

8-9 The "Fish Lake Valley Badlands" aka The Sump was not nominated for ACEC consideration, and do not meet the criteria for ACEC nomination.

8-10 Approximately 9,900 acres of the "Goldfield Joshua Forest" were considered for ACEC potential and did not meet the criteria for relevance, or importance.

8-11 Three-mile wide corridors allow for sufficient latitude so that the specific right-of-way location can be modified to protect cultural, wildlife, visual, or other resource values within the corridors. All rights-of-way will be no wider than necessary for the intended purpose, and will include appropriate NEPA review.

8-12 Twenty acres surrounding the Moores Station Petroglyphs were recommended for a potential ACEC and did not meet the criteria for importance.

8-13 Desert Tortoise habitat was not recommended for ACEC designation. Actions in tortoise habitats are regulated in activity plans such as allotment evaluations, multiple use decisions, and plans of operation, following guidelines as provided in the U.S. Fish and Wildlife Service Biological Opinion dated August 14, 1991.

8-14 The Proposed RMP/Final EIS provides for a balanced approach to management of OHV use in the Tonopah Resource Area.

LETTER 9 - AL DRAYTON

9-1 See response to 7-3.

9-2 A No Surface Occupancy (NSO) stipulation has been applied to protect important resource values. Under the previous land-use plan the Railroad Valley area 3,960 acres had a NSO stipulation to protect wetlands and riparian values. In the Proposed RMP the acreage protected by a NSO in Railroad Valley is reduced to 3,480 acres.

9-3 The property at Lockes Ranch was identified for acquisition only if the owner is willing, and if the acquisition is economically feasible. Portions of the property contain habitat for the Railroad Valley springfish, a listed threatened species, which the BLM is managing for on adjacent public lands, as well as important riparian habitat.

9-4 On the larger tracts identified for leasing with a NSO directional drilling would likely be infeasible. Although more costly, directional drilling on smaller tracts can be used.

9-5 Comments received during the public review period on the Draft RMP/EIS have been used to develop the Proposed RMP/Final EIS. Instructions on protesting are contained in the cover letter to this document.

LETTER 10 - JAMIE A. DRAYTON

10-1 See the response to comment 7-4 and 7-6.

10-2 An economic analysis of implementing the four alternatives in the Draft RMP/EIS or the Proposed RMP/Final EIS was not prepared, however, impacts to economic conditions were discussed in Chapter 4. As stated, the assumption was made that adequate funding and manpower would be available to implement any of the alternatives presented in the Draft RMP/EIS. Implementation of some determinations will begin immediately upon approval of the RMP. An implementation schedule will be developed for the remaining determinations. This schedule will give a basis for short-term and long-term budget requests.

LETTER 12 - DARRELL HARTING

12-1 Errors noted. The Proposed RMP/Final EIS has been edited. An Errata section has been provided in the Proposed RMP/Final EIS to identify errors discovered in the Draft RMP/EIS.

12-2 Due to the large acreage covered by the Proposed RMP, it was not possible to provide detailed maps in the document. The maps provided are only intended to give a broad depiction of the information being presented. This is particularly true in the case of land ownership where identification of small parcels of land is impossible to portray at the scale of the maps which are used. The identification of individual parcels is best accomplished using the Master Title Plats available at the Tonopah Resource Area Office.

LETTER 13 - RICHARD GRAEME

13-1 Designation of the Rhyolite ACEC will increase the cost of notice level exploration in the ACEC. The impact on cost and permitting time for development of claims near the ACEC would depend on the nature of the proposed development. The Proposed RMP/Final EIS weighs the relative resource values, and encourages mineral development with the least restriction possible consistent with the protection of the cultural resource values of the Rhyolite area.

LETTER 14 - SARAH LOCKE

14-1 The Railroad Valley springfish was listed as a threatened species by the Fish and Wildlife Service in the Federal Register Notice of March 31, 1986. The BLM is required to determine appropriate conservation measures to improve habitat conditions, resolve resource conflicts and identify habitat improvements or expansion efforts required to downlist or delist a species under the Endangered Species Act.

See response to 9-3.

14-2 Critical habitat is identified at North Spring and Reynolds Spring on public land near Lockes Ranch, and at Hay Corral and Big Spring on private land near Lockes Ranch. Two springs in the Duckwater area (outside of the Tonopah Resource Area) also have been identified as critical habitat.

LETTER 20 - AL DRAYTON

20-1 See response to 14-1.

20-2 The situation is vastly more complex than presented in the comment. Data derived from surface and subsurface contexts, and sophisticated laboratory analyses are needed to "tell the story." Numerous project specific surveys have been performed of oil pads and access roads in the Trap Springs field, but nothing is known regarding cultural materials that may be present in intervening locations. Existing surface data will be compiled and analyzed when funding is made available for this task, but a comprehensive survey of the existing and projected extent of the Trap Springs oil field must be performed before reliable conclusions can be drawn concerning the kinds of artifacts, hearths, and other cultural features present, their density, how they are distributed across the landscape, etc. When the comprehensive survey has been completed, a structured data recovery program can be developed to collect samples from hearths, structures, and surrounding living areas. These samples will provide information regarding when sites in the Trap Springs area were occupied, what kinds of resources were being used by the occupants, how resource use may have changed through time, etc., all important elements of "the story" that can not be addressed with surface data alone. Preparation of cultural resource management and data recovery plans for the Trap Springs archaeological district will facilitate, rather than hamper, oil and gas development.

LETTER 25 - KARI COUGHLIN, FRIENDS OF RHYOLITE

25-1 The Proposed RMP/Final EIS has been amended to identify approximately 160 acres of adjacent private lands (T.12 S. R.46 E., Sec. 9, SE 1/4) for acquisition based on an exchange, purchase from a willing seller or by donation. In addition, the withdrawal has been increased from 61 acres to 126 acres. The Rhyolite ACEC/SRMA will include all of the withdrawn area as well as those areas identified for acquisition, for a total of 425 acres.

25-2 It is not necessary to have a RMP determination to establish a rails to trails bike path. The BLM could be a participant if such a project is determined to be feasible.

LETTER 30 - MIDGE ONDES

30-1 See response to 25-1.

30-2 It is not necessary to include such a designation in the RMP to consider a Rhyolite scenic or backcountry byway at sometime in the future.

LETTER 32 -NEVADA DEPARTMENT OF AGRICULTURE

32-1 Area north of Test Site Boundary is identified for agricultural development in Proposed RMP/Final EIS.

LETTER 38 - NEVADA TRAPPERS ASSOCIATION

38-1 No specific management for furbearers is proposed in the Proposed RMP.

38-2 As shown in the Standard Operating Procedures (SOP) section, access to public lands is considered prior to any land disposal.

38-3 As listed in the SOP, seasonal restrictions apply specifically to fluid mineral leasing, non-energy mineral leasing, mineral material sales, geophysical prospecting, right-of-way construction, off-highway vehicle events, construction of range improvements, activities authorized under the Recreation and Public Purposes Act, and vegetation sales.

LETTER 40 - RAYMOND HAROLD KANSAS

40-1 See response to 2-2 and 2-3.

LETTER 42 - JOE FALLINI

42-1 A comparisons of the Proposed RMP with the *Nye County Land Use Plan* (1985) is shown in Appendix 15.

42-2 Planning documents such as a RMP are not subject to E.O. 12630.

42-3 Table 3 D in the Draft RMP accurately showed census data collected by the BLM for the dates shown. This Table was removed from the Proposed RMP/Final EIS since it only displayed information for 5 different years. Complete census information is available at the Tonopah Resource Area Office.

42-4 Appendix 5 has been amended to include reference to the *Tonopah Grazing EIS* (1980) in which the range improvement projects were originally proposed. A general listing of proposed improvements by allotment is provided in Appendix 5 in order to provide a full scope of potential projects which may be installed over the next 20 years (life of plan). A site-specific environmental assessment, including public comment, will be conducted in the planning stage for each project prior to construction.

42-5 Error noted. Appendix 6 and 7 have been amended to reflect "Current Stocking Levels" and "Interim Herd Sizes". Text has also been corrected.

42-6 The allotment categorization process includes range condition as one of the factors considered. The range condition of the Reveille Allotment is shown as unsatisfactory in Appendix 8 based on an ecological status inventory. Ecological status is determined by comparing the current production and percent species composition with that the site could support based on the potential of each ecological site. Of the classified acres in the Reveille Allotment; 2% is in Potential Natural Community (PNC), 64% is in late seral, 33% is in mid seral, and 1% is in early seral. Although the majority of the Reveille Allotment is in PNC and late seral, these areas are mostly low potential ecological sites which produce very little forage in late seral or PNC status. The mid and early seral stage areas are generally ecological sites with potential to produce very palatable and productive forage. The Reveille Allotment is considered in unsatisfactory condition until these mid and early seral stage ecological sites improve.

LETTER 43 - JOE FALLINI AND BEN COLVIN

43-1 Order 3 soil surveys have been completed for much of the Tonopah Resource Area. This information is collected and published and available from the Soil Conservation Service.

Also see response to 2-1.

43-2 Area A in Watershed 18 on Map 3 in the Proposed RMP/Final EIS was reevaluated based on further review and subsequently removed from the Proposed RMP/Final EIS.

43-3 The area assigned as category A in the north end of Watershed 12 on Map 3 in the Proposed RMP/Final EIS was reevaluated based on further review and subsequently revised in the Proposed RMP/Final EIS to changed to a B category.

43-4 This area supports both Wyoming Big Sagebrush and Black Sagebrush ecological sites. Both ecological sites are suitable for seedings.

43-4 After further review, categorization of this area was not changed.

43-4 After further review, no active erosion was found in this area and was dropped from the Proposed RMP/Final EIS. Categorization of the area identified as A was not changed.

43-7 Area referred to is not in the Stone Cabin Allotment.

43-8 Trend and ecological status have not been determined over the entire Tonopah Resource Area, therefore, only general statements about ecological status are made.

43-9 Ecological status and big game habitat condition ratings are not comparable. The ratings are based on different factors.

43-10 VRM maps are not included because they are not necessary in order to adequately describe the affected environment.

43-11 BLM Manual 6630, Big Game Studies was used to evaluate habitat conditions. Ecological status and big game studies condition ratings are not comparable.

43-12 Most good and excellent deer habitat occurs in the northern portion of the Resource Area. Livestock grazing is not prohibited on all mule deer winter ranges.

43-13 Error noted. All references to the Spring-Loving Centaury have been deleted in the Proposed RMP/Final EIS.

43-14 The representation of desert tortoise habitat is correct. Critical habitat was designated by U.S Fish and Wildlife Service on February 8 1994. The Non-intensive Category III habitat in the Resource Area was not designated as "critical" by the U.S. Fish and Wildlife Service. Livestock are authorized to graze throughout desert tortoise habitat in the Tonopah Resource Area. The statement on page 3-5 of the Draft RMP/EIS has been amended in the Proposed RMP/Final EIS to reflect that direct impacts from livestock may affect tortoise.

43-15 Information regarding the occurrence of sensitive species in individual allotments may be obtained from the BLM Tonopah Resource Area office, or the Nevada Natural Heritage Program.

43-16 As defined in the Glossary, riparian areas have vegetation or physical characteristics reflective of permanent water influence. Riparian areas do not require the presence of a perennial surface water source.

The presence of brook and rainbow trout in the portion of Clear Creek is unconfirmed. Table 3 C has been amended to reflect actual and unconfirmed fish occurrence.

43-17 The source for Appendix 12 is BLM Manual 8320 and is intended to define the different types of existing or potential recreation opportunities. The term "primitive" as used in the context of Appendix 12 refers only to the opportunity class as defined in the ROS. Primitive, as defined in 43 CFR 8352.0-5 (b) refers specifically to established recreation areas.

Off-highway vehicle restrictions have been revised in the Proposed RMP/Final EIS (see Maps 30 and 31).

See also response to 6-1.

43-18 Error noted. Sentence has been deleted from the Proposed RMP/Final EIS.

43-19 Error noted. Federal ownership amounts to 93 percent of the land within Nye County.

43-20 While there are many factors involved in the "market value" of grazing on public land versus private lease rates (including proximity and access), "The permit value is the result of permittee capitalization of the difference between the fee paid for grazing on public lands and the market rental value of the grazing over time." See, *Grazing Fee Review and Evaluation, A Report From The Secretary of Agriculture and The Secretary of The Interior*, dated February, 1986.

If the cost for grazing on public lands far exceeded private lease rates, the market equalizing mechanisms of supply and demand would bid up the cost of private lease

rates until parity was achieved.

The estimate of $5.25 net ranch income per AUM is a BLM estimate based on typical operating ranch budgets. It is calculated by deducting estimated cash costs and depreciation from estimated sales (gross income). It does not include costs to service long-term debt on land and capital (which are highly variable from ranch to ranch). Nor does it include an estimate for income (or wages) to family labor. Were such considerations to be included, many operations would, of course, reflect a negative net income.

43-21 Error noted. Text and maps have been modified to include all known bighorn sheep habitat areas.

43-22 See response to 42-5.

43-23 The Glossary has been amended to include definitions of short and long term monitoring as defined in the Nevada Rangeland Handbook.

43-24 Proposed RMP/Final EIS has been amended to include *Tonopah Grazing EIS* as a source of information for the proposed range improvement projects.

Also see response to 42-4.

Experimental Stewardship Plans did not amend the *Tonopah MFP* or *Tonopah Grazing EIS*. Experimental Stewardship was a tool intended to assist in meeting land use plan objectives by allowing greater involvement of the permittees in the management of allotments.

43-25 The *Esmeralda MFP (1976)* was replaced and superseded by the *Esmeralda-Southern Nye RMP* approved in 1986. The Record of Decision for the *Esmeralda-Southern Nye RMP* identified 10 Herd Management Areas and established the initial wild horse and burro populations for each. This decision was brought forward into the Tonopah Draft RMP/EIS and Proposed RMP/Final EIS. Any subsequent modification to decision will be accomplished through the monitoring and evaluation process.

43-26 See response to 42-5.

43-27 This paragraph was not intended to be a literal quote from CFR, however, it is in conformance with the 43 CFR 4110.3-2(b).

43-28 See responses to 43-3, 43-4, and 43-7.

43-29 The Proposed RMP/Final EIS combines the Vegetation Objective identified in Alternative 1 and 3 of the Draft RMP/EIS.

43-30 BLM Supplemental Program Guidance for Environmental Resources 1621.41A, requires VRM and related resources be included in every RMP. This is consistent with the Planning Process Overview section in the Proposed RMP/Final EIS.

43-31 BLM Manual 6630, Big Game Studies provides guidance on rating habitat in good, fair and poor classes. More recent BLM draft guidelines include a rating of excellent. Therefore, good or better is used to accommodate anticipated future formal changes

in the rating guidelines.

43-32 The definition of Proper Functioning Condition in the Glossary has been changed to match the current BLM definition.

43-33 See response to 43-16.

43-34 See response to 43-16.

43-35 Clear Creek has been found to be flowing in all years that it was surveyed. It is considered perennial on BLM lands between the USFS lands and the private lands (Clear Creek Ranch).

43-36 Allotment categorization was determined using the rating criteria and procedure as prescribed in BLM Supplemental Program Guidance 1622.31 d. A interdisciplinary team of BLM resource specialists were involved in the process. The team analyzed five different factors which were evaluated in assigning the allotment category.

The first parameter evaluated was Range Condition. The three subcategories used were: 1) Satisfactory, 2) Unsatisfactory, and 3) Not a factor (either undefined or unclassified). The assessment of range condition was based on ecological status where information was available. Condition was considered unsatisfactory if the most productive sites in an allotment were in mid or early seral stage. Range condition was undetermined on allotments without ecological status. The second parameter evaluated was Forage Production Potential. Three subcategories assessed were: 1) Moderate to high potential, present production near potential (High), 2) Moderate to high potential, present production low to moderate (Medium), and 3) Low potential, present potential is near potential (Low). The third parameter was Resource Use Conflicts. The subcategories were: 1) No serious conflicts or controversy, 2) Serious conflicts or controversy exist, and 3) Limited conflicts or controversy may exist. Resource use conflicts were high if serious conflicts existed such as wild horse habitat or critical wildlife habitat were present in the allotment. The fourth parameter, Present Management, was determined by evaluating the results of the recent animal grazing. The fifth factor, Economic Returns, was determined evaluating the rangeland potential and ranching operations potential to be successful and profitable businesses. After the interdisciplinary team evaluated all five factors for each allotment, a management category of either Maintain (M), Improve (I), or Custodial (C) was assigned.

The majority of the Reveille, Stone Cabin, Wagon Johnnie allotments are in late seral and Potential Natural Community (PNC) ecological status. However, the late seral and PNC areas are mostly associated with low potential ecological sites with low potential for forage production in late seral or PNC. The mid and early seral stage areas in the Reveille, Stone Cabin and Wagon Johnnie allotments correspond to ecological sites with potential to produce very palatable and productive forage. Because the early and mid seral areas are not producing at their potential, these allotments were determined by the interdisciplinary team to be in unsatisfactory condition. This classification will be revised as these sites improve.

In preparation of the Proposed RMP/Final EIS, Appendix 8 was noted as containing several errors, and appropriate corrections have been made.

43-37 See response to 43-36.

43-38 Allotment recategorization is specified in BLM Manual 1622.31 d, Supplemental Program Guidance and was determined by BLM to be appropriate for this RMP.

43-39 See response to 43-35.

43-40 With regard to mineral entry, lands returned by Congress from WSA status will be open to mineral entry under 43 CFR 3809 regulations and managed for multiple use as defined by FLPMA.

43-41 See response to 6-1.

LETTER 45 - BEN COLVIN

45-1 See response to 43-25.

45-2 See response to 43-25.

45-3 See response to 43-25.

45-4 See response to 43-25

LETTER 47 - MINING REMEDIAL RECOVERY COMPANY

47-1 The ACEC designation for Rhyolite is needed in order to ensure the preservation and enhancement of fragile and unique resources. All restrictions are subject to valid existing rights for mining.

47-2 The number of operations that will be adversely affected is clearly identified in Chapter 4. The degree to which these impacts may affect the operating economies of the individual operations is not known. Certainly, limiting factors would be imposed. However, by and large, the public lands in the Resource Area will remain open to unrestricted mineral development. The potential effects of the RMP proposals upon mineral operations are not seen as sufficient, in themselves, to suggest any expansion or contraction of the mining industry's contribution to the local income or employment.

The analysis which resulted in the determination of no significant impacts is based on an evaluation of potential changes that might be induced by prescriptions of the RMP, as compared to the current existing situation. Some of the proposals serve to enhance the potential for mineral exploration and development; some others impose restrictions which, on balance, are moderate and reasonable, and consistent with BLM's responsibilities under the law.

LETTER 48 - JIM PRICE

48-1 See response to 25-2.

LETTER 49 - NEVADA DIVISION OF STATE LANDS

49-1 Lands not identified for disposal in the RMP may be available for lease under the Recreation & Public Purposes (R&PP) Act only if analyzed in a plan amendment. The R&PP lease can include an option to purchase upon approval of an amendment to the RMP. Refer to the Standard Operating Procedures section for Lands.

49-2 It is the BLM's policy to use exchanges as the preferred method of acquisition. In addition, the BLM will consider Conservation Easements and Management Agreements as a means of achieving its management objectives.

49-3 The Department of Energy and Department of Air Force withdrew their request to the Bureau of Land Management to exclude the 4,840 acres north of the Tonopah Test Range from agriculture entry. Therefore, the Proposed RMP has been revised to allow disposal of the 4,840 acres agricultural activity.

49-4 All lands under application through the Carey Act are identified in the Proposed RMP/Final EIS for disposal.

LETTER 50 - PERMITS WEST

50-1 The scenic quality within 1.5 miles of the 5 identified highways is to be managed as VRM Class III (see Appendix 3).

50-2 New road construction in bighorn sheep habitat could be allowed subject to an environmental review. Mountain top communication facilities are permitted, but new access roads cannot be constructed for them.

50-3 Withdrawal is necessary to adequately protect bighorn sheep lambing grounds. For desert tortoise no "blanket ban" on roads is proposed. Non-Intensive Category III desert tortoise habitat will be managed by limiting vehicle use to existing roads and trails. Where new road construction is discretionary, no new roads will be constructed in those washes in which there will be an adverse impact on the desert tortoise.

50-4 Error noted. Chapter 4 of the Proposed RMP/Final EIS was corrected to read "... mostly playas with seasonal values as wildlife habitat ...".

50-5 In order to protect cultural values, the complexes will be restricted to existing roads and trails. A comprehensive cultural resources management plan will be developed for the Gravel Bar site in consultation with the SHPO and the Advisory Council on Historic Preservation. If all parties agree, this plan could contain provisions for road construction and excavation of gravel pits following data recovery in areas of new surface disturbance.

50-6 Cost will be considered along with other factors.

50-7 Site specific environmental analysis is necessary for each project to determine compatibility. New road construction will be allowed where necessary and compatible with the riparian values in the Railroad Valley ACEC.

50-8 No Surface Occupancy (NSO) restriction is required at Project Faultless which is the site of a subsurface atomic test and withdrawn from most uses. NSO is also required at Berlin which is being transferred to the State of Nevada under an R&PP sale agreement as a State Park for the management and protection of paleoentologic and historic resources. Berlin is in an area of unknown potential and no interest has been expressed in drilling.
Restrictions could be waived if the identified resource values can be protected.

50-9 A determination is made by the BLM on a project by project basis as to whether or not a cultural inventory is required. Cultural inventories are generally not required on playas.

50-10 New or improved access results in increased visitation to previously inaccessible areas. Sites in the vicinity of roads and trails are more likely to be vandalized or destroyed. Site boundaries will not be marked as these can draw unwanted attention to the resources. BLM staff will be used to monitor identified sites.

50-11 See response to 50-8.

50-12 Seasonal restrictions would not apply to production. Access for emergencies would be reviewed on a case-by-case basis by BLM. Reclamation standards will be applied on a case-by-case basis as determined by BLM.

50-13 See response to 50-8.

50-14 Recent laws and regulations have increased exploration and development costs. Compliance with these laws and regulations is not a discretionary element to be addressed in the RMP. The narrative did not state that, "... added costs and restrictions do not discourage exploration." Resource and environmental protection on the public lands of the United States is required by law. Such protections might necessarily increase operating costs.

Based on observation of the level of minerals exploration and development activity on the public lands within the State of Nevada, no evidence is available to indicate that these additional costs have been sufficiently prohibitive to discourage exploration.

The areas referred to are those areas of the Public Lands of the United States where the administration of minerals exploration and development activity is conducted by the Bureau of Land Management, under the laws of the United States.

T & E surveys, archaeological surveys and clearances, EAs, EISs, RMPs are required by law and regulation for all activities on public lands, as appropriate.

50-15 Cumulative impacts were determined by examining disturbances from existing fields and projecting those impacts through modeling to fields anticipated in the Reasonably Foreseeable Developments. The Proposed RMP/Final EIS does not regulate well spacing.

Data presented in the RMP estimates the actual disturbance within a right-of-way based on existing disturbances from pipelines. The figures presented do not reflect the total width of the right-of-way itself.

50-16 Methods used to recover archaeological data destroy the context of the materials. This negative effect is somewhat offset by detailed recording methods employed by archaeologists. It is not uncommon for cultural resources to be stabilized against further deterioration from natural causes.

LETTER 51 - ROGER HOCKERSMITH

51-1 See response to 49-3.

LETTER 53 - PEER

53-1 See response 2-2.

LETTER 54 - KENNETH REIM

54-1 Maps 32 and 33 in the Proposed RMP/Final EIS (formerly Maps 53 and 54 in the Draft RMP/EIS) reflect fluid mineral potential (oil and gas) potential only and do not reflect solid leasable (salt etc.) potential. The terminology of high, moderate and low potential was used to simplify the RMP to make it more understandable for the general public.

54-2 Error noted. Map 33 (formerly Map 54) has been corrected to show the change in potential.

54-3 See response to 54-1 and 54-2.

54-4 The Proposed RMP/Final EIS does not identify this specific area's potential, since it is under the jurisdiction of the USFS.

54-5 See response to 54-1.

54-6 Geothermal data was taken from Hoops, Richard 1990, which is included in the References Cited.

54-7 See response to 54-1.

Locatable mineral potential was determined using staff expertise and the references cited. Mineral potential areas were drawn without regard to artificial boundaries. Maps 36 and 37 (formerly Maps 61 and 62 in Draft RMP/EIS) have been checked to verify this information.

54-8 The Proposed RMP/Final EIS addresses management of BLM administered lands and as such does not include USFS lands in most analyses.

54-9 Employment and earnings data from mining is included in the text of Chapter 3. The intent of the Proposed RMP/Final EIS is not to develop a listing of past mineral production; such data is available from the References Cited.

54-10 Current data for employment and earnings was used at time the Draft RMP/EIS was prepared and is considered adequate for the intent of the Proposed RMP.

Earnings and employment figures depicted in Tables 3 M and 3 N accurately describe the direct income and employment associated with the major industrial classifications. The data is derived from the U.S. Dept. of Commerce, Regional Economic Information System, which utilizes raw data reported by the Nevada Dept. of Employment Security.

All industries, of course, have income and employment multipliers associated with their direct income and employment. While the multiplier for the mineral industry is one of the larger ones, it does not necessarily reflect that industry's contributions to a local area, or even a region as large as a state. Much of the materials and equipment required by mineral operations, and the employment associated with those materials and equipment, and even some of the necessary contract employment, is often obtained from outside a local community, or from specialized industrial suppliers in other states.

Often, a large portion of mineral workers' salaries is sent to families or dependents in other communities or states; or saved by workers temporarily located from other areas, for large purchases when they return home. Thus the multiplier effect of those income and employment dollars is "exported" to other areas. Therefore to suggest that the entire multiplier effect of a local minerals operation benefits the local community would be grossly overstating the case.

LETTER 55 - PEARSON AND SHAW

55-1 The public participation process followed in order to receive public comment is consistent with FLPMA, BLM policy, 43 CFR 1600 and the BLM/Nye County MOU.

55-2 See response to 55-1.

55-3 See response to 42-1.

55-4 See response to 43-36.

55-5 At the scale of the maps printed in this Proposed RMP/FEIS it is not possible to accurately identify small tracts of land. Land status is available for your inspection on Master Title Plats on microfilm at the Tonopah Resource Area office.

55-6 See response to 55-5.

55-7 See response to 55-5.

55-8 The Utility Corridor objectives as stated in the Proposed RMP/Final EIS are to facilitate the placement of major transportation and utility systems passing through the Resource Area. All valid existing rights-of-ways will continue to be honored.

55-9 FLPMA states that all lands are to remain in Federal ownership unless specifically they are identified in the land-use plan for disposal and meet certain criteria. The current land-use plans, described in the No Action Alternative, only identify 50,040 acres for consideration for disposal. Consistent with the objective for Lands and Rights-of-Way,

the Draft RMP/EIS (Alternative 4) and Proposed RMP/Final EIS propose opening additional lands for disposal to provide considerably more lands for community expansion.

55-10 See response to 55-1.

55-11 See response to 42-2.

55-12 There are no closures of existing roads and trails proposed in the Tonopah Resource Area except a short section of road in Railroad Valley known as the Gravel Bar Road, which is closed under current management. Access to valid existing rights or private property would be honored. Vehicle use will be allowed on existing roads within the 300-foot wide area on each side of streams closed to vehicular traffic.

See also response to 6-1.

55-13 See response to 55-12.

55-24 See response to 55-12.

55-15 See response to 55-12.

55-16 Adjustments in livestock grazing will be accomplished in accordance with the Forage Allocation process as described Chapter 2 of the Proposed RMP/Final EIS. It is not the intent of the RMP to decrease or eliminate grazing on public land, rather it is to observe the principles of multiple use and sustained yield as required in Section 202 (c) of the Federal Land Management and Policy Act of 1976.

LETTER 56 - JOHN LOCKE

56-1 Only springs on public lands are included for protection under the provisions of the Proposed RMP/Final EIS. These are North Spring and Reynolds Spring.

56-2 The maps provided in the Proposed RMP/Final EIS indicate proposed management actions for the entire Resource Area. Without legal descriptions of the areas in question, we are unable to respond.

LETTER 59 - NEVADA ARCHAEOLOGICAL ASSOCIATION

59-1 Issues regarding visual impacts to the Rhyolite townsite will be address in the Special Recreation Management and Cultural Resource Management Plans discussed in the Proposed RMP/Final EIS.

59-2 See response to 25-1.

59-3 The process by which ACECs are nominated and designated is discussed in Chapter 3 of the Proposed RMP/Final EIS. As provided in BLM Manual 1613, opportunity exists for the addition of ACECs after the issuance of the Approved RMP through the RMP Amendment process, if additional information becomes available.

59-4 See response to 59-3.

59-5 See response to 2-2.

59-6 Additional information regarding RMP maintenance and amendment processes has been added to the Standard Operating Procedure section of the Proposed RMP/Final EIS.

59-7 A brief summary of the alternatives for each of the six planning issues was presented in Summary, pages 2 and 3, in the Draft RMP/EIS.

LETTER 60 - DEBORAH HAY OWENS

60-1 See response to 2-2.

LETTER 62 - TRISH RIPPIE

62-1 See response to 49-3.

LETTER 63 - NYE & ESMERALDA COUNTY ECONOMIC DEVELOPMENT AUTHORITY

63-1 See response to 49-3.

LETTER 64 - KENNECOTT EXPLORATION COMPANY

64-1 See response to 6-1.

64-2 WSAs not designated by Congress as Wilderness Areas will be returned to Multiple Use. Multiple Use, as defined by FLPMA sec. 103 (c), "means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the resent and future needs of the American people;...the use of some of the land for less than all of the resources;...and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative value of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output".

Reclamation will be required in accordance with 43 CFR 3809 and 3802 regulations.

The Proposed RMP/Final EIS has been revised to remove the phrase "reclamation to resemble a natural state".

OHV restrictions have also been revised. See response to 6-1.

64-3 The Standard Operating Procedures section for Lands in the Proposed RMP/Final EIS reflects that designation of a corridor does not mean that future rights-of-way are restricted, nor does it mean that there is a commitment by BLM to approve all rights-of-way applications within corridors.

64-4 See response to 47-2.

64-5 The FLPMA requires that BLM give priority to the designation and protection of ACECs. ACECs are identified, evaluated, and designated through BLM's resource management planning process in accordance with 43 CFR 1610.7-2.

Lone Mountain is not withdrawn from mineral entry in the Proposed RMP/Final EIS.

LETTER 65 - HERMAN R. LINDEMANN

65-1 A total of 70,600 acres is identified on Map 15 in the Proposed RMP/Final EIS (formerly Map 19 in the Draft RMP/EIS) as Non-intensive Category III desert tortoise habitat. A no surface occupancy (NSO) restriction within the desert tortoise habitat was not proposed in the Draft RMP or in the Proposed RMP. There is, however, a 490 acre NSO proposed in the Amargosa Oasis ACEC. This ACEC is predominantly associated with the Amargosa River and designated for the protection of riparian values and the habitats of special status species.

LETTER 66 - NYE COUNTY

66-1 See response to 55-1.

66-2 See response to 43-15.

66-3 The legal jurisdiction of BLM on public lands, including law enforcement, is supported through Federal law and Supreme Court Decisions. A summary of the legal basis for BLM jurisdiction has been previously provided to Nye County by BLM State Director, Billy Templeton, in a letter dated 1/31/94.

66-4 The Proposed RMP/Final EIS has been revised to more adequately identify appropriate data sources and references.

66-5 See response to 43-20, para. 2.

66-6 Error noted. Full references and citations have provided in the Proposed RMP/Final EIS.

66-7 The limits of analysis of cumulative impacts and assumptions for analysis are described in the Cumulative Impacts section of the Draft RMP and the Proposed RMP/Final EIS.

66-8 The Summary of Impacts by Alternative was intended to provide a comparison of impacts to the six planning issues dealt with in the RMP. The analysis of social and economic impacts by alternative is properly placed in Chapter 4 of the Draft RMP/EIS and the Proposed RMP/Final EIS.

66-9 A summary of all scoping meetings, letters to respondents, discussions with Nye County officials and public meetings was provided to Governor Bob Miller in a letter dated November 26, 1993. This letter was in response to Nye and Esmeralda Counties concerns, as expressed by Governor Miller in his letter to former BLM Director, Jim Baca. Letters received during the comment period for the Draft RMP are printed in whole, or in part, in the Proposed RMP/Final EIS.

66-10 The BLM follows all applicable Nevada State water laws and regulations. Authority for acquisition of public water reserves was granted by Executive Order 107 of April 17, 1926. Authority to assert appropriative water rights through state statutory and administrative claims procedures include, but are not limited to: the Taylor Grazing Act of June 28, 1934, the Federal Land Policy and Management Act of October 21, 1976, and the Public Rangelands Improvement Act of October 25, 1978.

66-11 A map of VRM classifications from the Tonopah MFP and Esmeralda-Southern Nye RMP is available for review in the Tonopah Resource Area office.

66-12 Data have been collected by BLM according to BLM Manual 6671, Stream Survey. All listed streams are considered perennial.

66-13 Data were collected by BLM. Specific study information may be obtained from the Tonopah Resource Area office.

Also see responses to 43-9 and 43-10.

66-14 Very little data exists regarding participation in recreation activities in the Tonopah Resource Area. That which does exist is largely speculative and rests on gross estimation. Neither the county, the state, nor BLM have had the time, or opportunity, or funding to explore, in any formal, organized manner, the incidence of recreation activity. It was determined that the 1983 data, as updated utilizing 1990 census data, was the best data available at the time the Draft RMP/EIS was prepared.

It was never implied or assumed that all recreation use comes from Nye and Esmeralda County residents. Table 3 F utilizes County population estimates in the analysis simply because no other definitive data is available.

66-15 Our population data incorporated the latest estimates of the Nevada State Demographer's Office, Nevada State Department of Administration at the time the Draft RMP/EIS was prepared. Since these are official state estimates, it was determined that they were suitable to our purpose. Of course, it is recognized that the population in many areas of the state fluctuates rapidly in response to industrial and employment factors, particularly the boom-bust character of the mining industry. Such influences, particularly in counties with a relatively small population base, render any attempt at population projections difficult, at best.

66-16 The data produced by the Bureau of Economic Analysis (BEA) of the U.S. Department of Commerce, in cooperation with state employment agencies, are the most authoritative data available. As part of the national income and accounting system, these data are benchmarked to the national accounts (GNP) and to the national input-output table. They are statistically sound and enjoy a broad reputation for credibility.

While the total income figures in the BEA data are adjusted for residency, you are correct in your observation that the employment by industrial sector is by <u>place of work</u>. This is the statistic most suitable to our purposes. BLM's management of the public lands, and its potential influence on local industry is the principal economic topic to be addressed. One characteristic which suitably describes local industry, is the employment that industry generates. Where people choose to live depends largely on the availability of amenities that they might prefer, and does not diminish the

usefulness of characterizing an industry by the number of jobs it provides.

66-17 It was determined that management proposals would introduce no significant changes in the existing utilization of public land resources, and initiate no significant new influence on industrial or economic activity in the resource area. In accord with the National Environmental Policy Act, extensive analysis, discussion, and documentation of those considerations was determined to be an inappropriate and unnecessary application of public funds. (See 40 CFR Part 1500.1. Purpose. "...Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.")

66-18 See response to 66-17.

66-19 Current data on the attitudes and values of the residents of the area would be interesting but not necessarily useful to the purpose at hand. The necessary surveys, including development of statistically valid questionnaires, is time consuming and expensive. Without any significant impacts having been identified, such an undertaking would be difficult to justify as an appropriate and necessary expenditure of public funds.

See response to 66-17.

66-20 See response to 66-17.

66-21 Error noted. Information was obtained from the Nye County Profile, page 29, prepared by the State of Nevada, Office of Community Services, April, 1985. Text corrected to reflect that Nye County is 93 percent Federal lands.

66-22 This statement was intended to illustrate that the agricultural base does not generate additional high levels of income in other county industries through the local purchase of major equipment items. Day-to-day purchases of incidental supplies and equipment, and purchases by individuals for necessities of normal living, while important in any local economy, are certainly not of the same magnitude in inter-industry effects. That is why local and regional economies that seek economic growth, prefer to attract "basic" industries that export goods and import dollars; thereby creating jobs and income within the local area. The circulation of "local" dollars within an economy does create additional income and employment - but the multiplier effect of those dollars is of lesser significance to economic well-being.

Conversely, dollars exported for major purchases outside of a local economy have the effect of diminishing potential economic growth.

66-23 See response to 43-19.

66-24 Proposed changes in Federal regulations and fees is a matter of political decision making it not amenable, or appropriate, to analysis in this RMP.

66-25 See response to 66-16 and 66-24.

66-26 The "list" of "...Public land resources associated with recreation and affected by this plan..." includes lands. There was no reason to itemize the many and varied types of recreation uses for which these lands might be utilized. OHV use is discussed in

paragraph four of that section.

The expenditures deriving from recreation activities were estimated using expenditure-per-day estimates from the 1980 National Survey of Fishing, Hunting, and Wildlife Associated Recreation, prepared jointly by the USDOI, Fish and Wildlife Service, and the US Bureau of the Census. These data were adjusted to 1990 values, in conformance with the data in Table 3 F, with the GNP Implicit Price Deflator. Income and Employment estimates were approximations based on adjusted employment coefficients and income multipliers from, An Input-Output Model of the Economy of Humboldt and Lander Counties; Fillo, Frank D., Hans D. Radtke, and Eugene P. Lewis. 1978. Nevada Review of Business and Economics. Reno, NV.

66-27 The BLM is satisfied with the adequacy of the analysis. Considering the relatively low recreation participation, spread over such a large land area, it is very clear that none of the management proposals will have any measurable effect on recreationists choices, activities, or frequency of participation.

The Draft RMP/EIS and the Proposed RMP/Final EIS point out that neither OHV designations nor adjustments in wildlife populations will produce a measurable difference. If there were any significance attached, the potential would certainly be measurable.

It is useful to remember that the vast majority of recreation on the public lands is dispersed and undocumented. Very little data exists; that which does exist is largely speculative and rests on gross estimation. Neither the county, the state, nor BLM have had the time, or opportunity, or funding to explore, in any formal, organized manner, the incidence or economic importance of this activity. The State does produce the Statewide Comprehensive Outdoor Recreation Plan every five years which would be necessary to obtain and utilize funding provided by the federal government. This document is probably the best effort within the state to quantify the undocumented recreation that is occurring even though it does rest on gross estimation techniques.

It is recognized, at all levels of government, that public land recreation does contribute, as stated in the Draft RMP/EIS and the Proposed RMP/Final EIS, "in some measure" to local economies. For this reason, and for the pleasure derived by the recreating public, such activities are considered valuable and to be encouraged. However, it is also recognized that the incidence and economic importance to local economies of recreation on the public lands are far below levels that would justify the use of taxpayer funding for intensive or in-depth research and surveys to document its occurrence.

The "dated" study referred to is an official state estimate. Where so little else exists, the BLM is comfortable to utilize it as at least a rough measure of recreation activities in Nye County. It has, of course been adjusted for changes in population.

With regard to your suggestion for 20-year projections, please refer to response 66-17.

66-28 The RMP does not consider pending changes to rangeland management as such changes are outside the scope of this document. The RMP will be amended, if and when such changes require it for conformity.

66-29 See response to 42-5.

Also see response to 43-26.

66-30 As stated in the Development of Planning Criteria section of the Proposed RMP/Final EIS, the RMP/EIS does not address re-allocation of forage. The RMP/EIS brings forward from the two existing land-use plans the current stocking levels, as modified by ongoing allotment evaluations. For the purpose of clarification, the monitoring, evaluation and adjustment process is summarized in the Proposed RMP/Final EIS. The methodology described has consistently been used, with minor revision, since 1984 in implementing the two existing land-use plans.

66-31 See response to 66-30.

66-32 See response to 49-3.

66-33 See response to 42-4.

66-34 See response to 43-26.

66-35 See responses to 43-36 and 66-30.

LETTER 67 - NYE COUNTY

67-1 See response to 55-1.

67-2 See response to 42-1.

67-3 Whenever permits are granted and rights-of-way applications received, detailed environmental analysis of the project will be undertaken.

67-4 See response to 66-30.

67-5 See response to 66-28.

67-6 See response to 43-36.

67-7 The RMP was written as clearly and specifically as possible. The 90-day comment period was provided to allow for any questions or clarification of issues as necessary for the understanding of the public.

67-8 Because of the variety of public interests in the RMP, ranging from pro-development to pro-protectionist, it is not unusual, nor is it indicative of inadequate public or agency input, that Alternative 4 was not generally supported in its entirety.

LETTER 68 - NYE COUNTY PUBLIC MEETING (transcribed record)

68-1 See response to 43-36, para. 2.

68-2 A diligent effort was made to involve as many publics as possible in the consultation and coordination process. Chapter 5 of the Proposed RMP/Final EIS details the process followed.

68-3 See response to 55-5.

68-4 Page 2-7 is part of Alternative 1 of the Draft RMP/EIS and describes decisions from the existing land-use plan *(Tonopah Management Framework Plan, 1980)* which was current at the time the Draft RMP/EIS was issued. Specific area were detailed in the maps which supported the plan. These maps are on file at the Tonopah Resource Area Office and were not intended to be included as part of the Draft RMP/EIS. The Proposed RMP/Final EIS provides for the preparation of specific activity plans to guide watershed management in the Resource Area. Specific information will be presented in these plans describing locations of any proposed watershed improvement projects. An opportunity for comment by affected parties on these proposed plans will be provided.

68-5 The Proposed RMP/Final EIS complies with 43 CFR 1610.3.

68-6 See response to 42-4.

LETTER 69 - RICHARD L. CARVER

69-1 See response to 42-1.

69-2 See response to 55-1.

69-3 See response to 67-7.

69-4 See response to 69-1.

69-5 See response to 55-5.

69-6 As stated in Chapter 3, Table 3 C is intended to list the <u>important</u> streamside riparian habitats which occur <u>on</u> public lands. As such, the minor streams were not included.

69-7 The earliest wild horse and burro counts of record are for 1974. This information was included in Table 3 D of the Draft RMP. This Table has been deleted from the Proposed RMP/Final EIS. Complete census data is on file at the Tonopah Resource Area Office. Maps 18 and 19 reflect the boundaries of herd areas in 1971 when the Wild and Free Roaming Horse and Burro Act became law.

69-8 Data presented in Table 3 L is based on information current as of 1990 when the Draft RMP/EIS was prepared.

69-9 See response to 42-4.

69-10 See response to 43-36, para. 2.

69-11 See response to 55-1 and 69-1.

LETTER 70 - USDI NATIONAL PARK SERVICE, WESTERN REGION

70-1 BLM's policy is to prepare site-specific environmental reviews of all proposals affecting public lands. Water resources will be considered in these reviews. In addition BLM provides input on specific water applications that may have the potential for affecting BLM programs or general resource management interests.

70-2 The meaning of "closed system", as used in the document, is that formation water produced with oil and gas which is isolated from phreatic water that may sustain springs or be developed ground water sources. Oil wells drilled through a zone of saturation are invariably sealed to ensure the continued isolation of the formation water. Most reinjected water is formation water produced with oil and gas recovery. Authorization by the Nevada Division of Environmental Protection for the injection of phreatic or surface water will not be given unless it can be shown not to result in an unacceptable impact on the water resource.

LETTER 71 - W. B. KOHLMOOS

71-1 See response to 55-5.

BLM does not maintain records of private water rights on public lands. Water rights records are maintained by the Nevada State Engineer.

71-2 See response to 55-1.

LETTER 73 - NORMAN SHARP

73-1 In addition to the public hearings, written comments were also encouraged and accepted during the public comment period from June 4 through October 1, 1993.

73-2 See responses to 66-29 and 43-26.

73-3 Economic impacts of each of the four Alternatives presented in the Draft RMP were discussed in Chapter 4 of that document. Economic impacts are also discussed in Chapter 4 of the Proposed RMP/Final EIS.

73-4 The Proposed RMP/Final EIS provides overall management direction for public land management in the Tonopah Resource Area. It is not intended to discuss or set management policy.

73-5 See response to 55-12.

LETTER 76 - WOLFF MANAGEMENT GROUP

76-1 Disposal of lands, or desert land entries in the Gold Point area were not identified as an issue to be considered during scoping for the RMP in 1990 and are therefore not discussed. Proposals for such actions may be considered after acceptance of the RMP. However, such actions would require a revision of the RMP.

LETTER 77 - ROUND MOUNTAIN GOLD CORPORATION

77-1 See response to 43-40 and 64-2.

77-2 See response to 64-2.

77-3 Error noted. Wording has been revised in the Proposed RMP/Final EIS to provide consistency with the 43 CFR 3809 regulations.

77-4 This Appendix in the Draft RMP/EIS has been eliminated from the Proposed RMP/Final EIS.

77-5 Big game habitat condition will not be factored into bond release.

Also see response to 43-11.

77-6 See response to 77-4.

77-7 The 3900 acres of open pit disturbance include that which is presently proposed and that which is "reasonably foreseeable" on public land over the next 20 years. It does not include the Round Mountain pit, where all proposed unclaimed disturbance is on private land, nor does it include the Echo Bay Manhattan project, where there is no additional disturbance proposed. Within the Tonopah Resource Area the general locations of Round Mountain and Manhattan comprise the areas of probabilistic assessment of potential future development.

LETTER 78 - BLUE EAGLE RANCH

78-1 See response to 55-1.

LETTER 82 - LAC MINERALS

82-1 Designation of an ACEC enables a greater degree of management and protection by requiring a Plan of Operation with affirmative BLM approval and appropriate operating stipulations for operations involving less than five acres of disturbance.

82-2 Since all mineral entry withdrawals would be subject to recognition of valid rights existing at the time withdrawal, withdrawal would not be construed as a takings. If an operation is proposed on claims pre-dating the withdrawal, it might be necessary to demonstrate the validity of the claims. That is, show that a valid discovery existed on the date of withdrawal and that the discovery still exists. Ownership of claims in a withdrawal may be transferred, but, if the claims are abandoned they may not be relocated.

82-3 The assumptions and background data that form the basis for calculation of these figures are provided in the Cumulative Impacts section of the Proposed RMP/Final EIS, under Identification of Resources Impacted Cumulatively, Cultural Resource Component.

82-4 Management would be enhanced by 1) the requirement that Plans of Operation must be filed for all mineral exploration activities in ACECs, 2) management plans would be developed for ACECs which would guide protection as well as development actions, and 3) increased funding that may become available for resolving resource conflicts.

82-5 See response to 47-2.

82-6 The primary basis for determining no significant economic impact difference between alternatives 2 and 4 was the fact that there is only a difference of 0.2% in the area open to entry in the two alternatives. The impact of potential increased fees and regulations are outside the scope of this document and cannot be analyzed.

LETTER 83 - U.S. FISH AND WILDLIFE SERVICE, RENO

83-1 Rather than speculate on the impacts of potential projects, impacts will be evaluated according to procedures outlined in Standard Operating Procedures for Environmental Review and Management when a formal application is submitted to BLM.

83-2 Vegetative overuse is determined using monitoring methods described in the 1984 Nevada Rangeland Monitoring Handbook and other BLM technical references.

83-3 A definition of common desert plants has been added to the glossary. Joshua trees, cholla cactus and prickly pear cactus are currently sold as wildings.

83-4 The Lunar Crater ACEC has been included in the Proposed RMP/Final EIS. The Timber Mountain Caldera ACEC was dropped. The Railroad Valley, Lone Mountain, and Amargosa-Oasis ACECs are proposed in the Proposed RMP/Final EIS.

83-5 The current national fire policy requires the BLM to aggressively attack all man caused and naturally occurring fires. Fires in WSA's could be monitored providing a prescribed fire plan has been developed. When prescribed fire plans for WSAs in the Tonopah Resource Area are written, natural fires will not be fought providing they are within the parameters of the approved fire plans. The Proposed RMP/Final EIS does allow for prescribed natural fire provided a plan is completed. Prescribed burns are described in the Standard Operating Procedures (SOP). Fire management has been revised in the Proposed RMP.

83-6 See response to 83-4.

83-7 Authorization of Joshua tree sales has been reduced from 600 trees to 100 trees in the Proposed RMP/Final EIS. This level of harvest will have no significant effect on the population. No studies have been conducted to date determining the sustainable yield. Once these studies have been completed, the limit will be adjusted accordingly.

83-8 Although "unrestricted" removal of deadwood is allowed, the majority of dead trees exist in inaccessible areas and in this way are protected. In the Proposed RMP/Final EIS only the harvest of dead pinyon and juniper is allowed.

83-9 Livestock Grazing Management, Determination 3, of the Proposed RMP/Final EIS indicates that livestock will be excluded from 11,163 acres. The BLM is aware that livestock grazing may need to be excluded in sensitive areas and areas of special

concern.

83-10 Adequate provisions have been made for assessing and minimizing impacts to sensitive areas. See Determination 6 under Lands and Rights-of-Way and also SOPs for Lands in the Proposed RMP/Final EIS.

83-11 Cumulative impacts are addressed in environmental analyses conducted by the BLM.

83-12 See SOPs for Lands, criteria applied to site specific determinations in the Proposed RMP/Final EIS.

LETTER 84 - NEVADA MINING ASSOCIATION

84-1 The purpose and need for the Draft RMP/DEIS and Proposed RMP/Final EIS is discussed in the Introduction section of each document. As stated in that section, the RMP is in conformance with all pertinent laws and regulations. The process for formulation of the alternatives is also discussed in these documents.

84-2 See response to 64-2.

84-3 See response to 77-3.

84-4 Mineral exploration and development are not excluded from Class II VRM areas. The BLM Manual 8431 states: "The contrast rating system is a guide, not a decision process ... [which] provides a means to identify mitigating measures to help reduce contrast." It also states: "Few projects meet the VRM management objectives during the construction activities." In addition to mitigation during long term operations, VRM categories help determine the types of reclamation required after activities, such as mining occur.

84-5 See response to 84-1.

84-6 The majority of the Park Range WSA and Riordan's Well WSA are in the Ely BLM District, although portions of each are within the Tonopah Resource Area. Likewise, the Antelope Range WSA is largely within the Shoshone-Eureka Resource Area, Battle Mountain District, with a small portion located in the Tonopah Resource Area. Each of these WSAs have been included in the appropriate Wilderness EISs as well as the "Nevada BLM Statewide Wilderness Report" dated October, 1991. The Tonopah Resource Area must administer these lands under the Interim Management Policy until those WSA's are either designated as wilderness, or released by Congress from WSA status. As stated in the Proposed RMP/Final EIS, lands not designated as wilderness by Congress would be returned to multiple use.

Also see response to 64-2.

84-7 See response to 77-4.

84-8 See response to 64-1.

84-9 See response to 64-2

84-10 See response to 54-10.

84-11 Error noted. Language in the Proposed RMP/Final EIS has been revised to indicate that air quality "may" be degraded during construction and mining activities.

84-12 See response to 77-8.

84-13 There is the potential, however small, for desert tortoises to be killed when vehicular traffic or other habitat disturbing activities occur in desert tortoise habitat. This statement was not meant to imply mining cannot occur within tortoise habitat.

84-14 An unknown number of cultural resources have been wholly or partially destroyed as a direct or indirect result of mineral exploration activities performed under the Notices of Intent provisions of 43 CFR 3809. Because these activities are not considered Federal Undertakings, they are not subject to inventory and Section 106 consultation. Inventory and Section 106 consultation is required for all mining activities performed under Plans of Operation. Mitigation of adverse effects to cultural resources in the vicinity of proposed mines is achieved through partial data recovery at selected sites. Sites are avoided whenever possible, but many are destroyed by the proposed mining activity.

Also see response 50-10 regarding increased access.

84-15 See response to 64-1.

LETTER 85 - SIERRA CLUB, TOIYABE CHAPTER

85-1 Watersheds identified for rehabilitation will be considered in activity plans as discussed in the Watershed section of the Proposed RMP/Final EIS. Appropriate actions to provide for the rehabilitations of the watershed will be identified. The listed structural developments are presented only as examples of projects which would be considered. All alternative treatments would be evaluated to provide for the most cost effective method(s) of correcting the problem.

85-2 "Implementation" has been added to the Watershed, Determinations section in the Proposed RMP/Final EIS.

No HMPs have been developed in critical watersheds. Allotment evaluations completed to date have not specifically dealt with watershed problems. Grazing systems and reductions proposed in the allotment evaluations and multiple use decisions should help alleviate erosion problems. Future allotment evaluations and HMAPs will specifically address watershed issues in those areas identified for watershed treatments. No HMAPs have been finalized in critical watershed areas.

85-3 11,163 acres are closed to livestock. Damaged watersheds can be improved without completely removing livestock. Well designed grazing systems, if followed, will allow damaged watersheds to improve. Closing small portions of grazing allotments, such as riparian zones, may be necessary. But completely removing livestock may not improve condition faster than controlled grazing. Damage to watersheds associated with livestock grazing is to be determined in activity level planning (allotment evaluations) utilizing long and short term monitoring data.

85-4 Desired plant communities were developed for ecological sites. These ecological sites usually cover hundreds of thousands of acres. Wild flowers (forbs) vary greatly from area to area and from year to year and could not be listed for each ecological site. Specific desired plant communities will be developed for specific areas. These plant lists will include forbs.

Woodland sites have been added to the desired plant communities to Appendix 1 in the Proposed RMP/Final EIS.

85-5 See response to 85-3.

85-6 See response to 85-2.

85-7 Reintroduction or augmentation of bighorn sheep is included. The reintroduction or augmentation of pronghorn, upland game birds and special status species has been added to the Proposed RMP/Final EIS.

85-8 See response to 85-3.

85-9 As identified in Standard Operating Procedures (SOPs) section for Lands, disposals are discretionary and allowed only if consistent with the SOPs.

85-10 Potential impacts to riparian areas due to permitted recreational activities are identified during the environmental review process with measures stipulated as required to avoid or mitigate those impacts. Impacts to riparian areas due to notice level mineral activities are difficult to control due to current mining laws. Activities conducted under a Plan of Operation would identify restoration of impacted sites, and would likely provide for avoidance of riparian areas.

85-11 The percent cover rating relates to Proper Functioning Condition and does not correspond to BLM's national program objective. Wording has been modified in the Proposed RMP/Final EIS to clarify this.

85-12 Fencing of existing spring developments will occur on a case-by-case basis as the need is identified through the allotment evaluation process, and as funding becomes available.

85-13 See response to 85-3.

85-14 The intent of the projects listed in Appendix 5 is to provide for proper management of livestock for the mutual benefit of the various natural resources occurring within a given allotment. These projects, in conjunction with proper livestock management could be used to provide for restoration of damaged riparian areas, watersheds and wildlife habitats.

85-15 This was not identified as an issue during scoping for the RMP, and therefore will not be considered. Problems or issues concerning season of use by livestock will be considered during allotment evaluations and corrective actions will be implemented as needed.

85-16 The determinations specified in the Proposed RMP/Final EIS are consistent with BLM policy and provide the guidance which is necessary for proper management of natural

resources in the Tonopah Resource Area.

85-17 See response to 85-16.

85-18 The SOPs in the Proposed RMP/Final EIS have been revised to indicate that exchange is the preferred method of acquisition and disposal.

85-19 In accordance with BLM guidance, activity plans for ACECs are not required but will be prepared where circumstances warrant.

85-20 The Sump was considered for designation as an ACEC in the RMP process but was determined to not meet the criteria of relevance. However, opportunity exists for the addition of ACECs after the issuance of the Final RMP through the RMP Amendment process should additional information become available.

85-21 It is BLM policy to resolve access problems as they are identified. A special determination is not necessary.

85-22 This statement is consistent with the definition of Multiple Use as stated in FLPMA.

Also see response to 64-2.

85-23 Ecosystem management is a relatively new direction for the BLM and, as such, little guidance is available for inclusion into this RMP. In the future, if guidance regarding ecosystem management is developed which modifies management objectives stated in the RMP, the RMP will be amended to conform with the new guidance.

85-24 The Proposed RMP/Final EIS was prepared in accordance with current guidance regarding Biological Diversity as required in BLM Manual 1620.

85-25 BLM's monitoring and evaluation program provides the guidance necessary to adjust livestock numbers in allotments with less than satisfactory range condition. Affected interests are an integral part of the monitoring and evaluation program. The Proposed RMP/Final EIS has been revised to indicate that the alternative of removing livestock on allotments with less than satisfactory condition will be addressed through the monitoring and evaluation process.

85-26 The allotment monitoring and evaluation process is the method used for adjusting numbers of livestock, wild horses and burros, and wildlife to carrying capacity and implementing changes in management. The Tonopah Resource Areas schedule for allotment evaluations has been established and is available at the Tonopah Resource Area Office. The public is updated through distribution of updated Range Program Summaries.

85-27 All such information is available at the Tonopah Resource Area Office.

85-28 Monitoring is required of all existing Land Use Plans. The results of this monitoring and implementation is available at the Tonopah Resource Area Office.

85-29 Intensified livestock management would reduce soil erosion. Other methods of reducing erosion control are expensive, particularly on the large arid areas of the Tonopah Resource Area. Natural erosion of the relatively bare rangelands of the arid

southwest US is relatively high compared to other areas of the US.

The Proposed RMP/Final EIS has been amended to expand the discussion on watershed and a definition of "Accelerated Erosion" has been added to the Glossary.

Also see response to 43-1.

85-30 The Water Resources section of the Affected Environment has been expanded in the Proposed RMP/Final EIS to more fully explain water quality issues.

85-31 Ecological Site Inventory (ESI) has been conducted on portions of the Resource Area, but not all. The data collected to date was used as the basis of the general statement regarding the ecological condition of certain vegetative community types. As the data are not complete for the entire Resource Area, it is only presented in a general format. Existing ESI data is available upon request at the Tonopah Resource Area office.

85-32 A method for establishing functional condition of lotic systems has recently been developed, and methods for evaluating lentic systems is currently being developed. As stated on SOPs new spring and seep developments will be fenced.

Also see responses to 85-11 and 85-12.

85-33 Livestock trespass abatement is an ongoing and aggressive process in the Resource Area. Use supervision is conducted on every allotment using ground surveillance, and when necessary, aerial surveillance techniques.

Ephemeral grazing is not allowed by previous land-use plans, nor is it proposed in this document.

Temporary non-renewable grazing is a discretionary action of the Authorized Officer and is occasionally allowed in accordance with 43 CFR 4130.4-2.

85-34 Specific information on ACECs considered but not proposed for designation were not included in the *Draft RMP*. However, a description all 43 (*Draft RMP* stated 33 which was in error) areas nominated is included in Appendix 17 of the Proposed RMP.

85-35 The assumptions that sufficient funding and personnel would be available to implement any one of the alternatives are based on existing laws, legal requirements and policies. One must assume that Congress will provide adequate funding to provide for the laws, regulations, etc. which it requires the agency to implement.

The Standard Operating Procedures provided in the Proposed RMP/Final EIS will be incorporated into all appropriate BLM authorized activities in order to protect the environment. Since these assumptions have been developed to provide a framework for analysis of environmental consequences, it would not be appropriate to include a description of current public land management in this section.

85-36 The Proposed RMP/Final EIS, Vegetation, Determinations, section states that descriptions of specific desired plant communities will be developed at each key area based in the ecological potential and other information gathered at the site.

85-37 See response to 77-4.

85-38 Information regarding the Allotment Evaluation Process is available from the Tonopah Resource Area office, or the BLM Nevada State Office.

LETTER 86 - NEVADA CLEARINGHOUSE, NEVADA DEPARTMENT OF MINERALS

86-1 Data was current at the time the Draft RMP was written. There is often great year to year variability in activity and it is not always clear when a well is a wildcat or an offset or development well. In light of the drilling activity over the past year in a soft market it would appear our projection may have been too conservative. On the other hand the results of the drilling may not encourage a continuation of the recent drilling rate. Any forecast of future activity is arguable.

86-2 The gap between scenarios E and F has been closed by redefining medium and large mines and a commensurate adjustment of numbers in the Proposed RMP/Final EIS.

86-3 Error noted. A description of Impacts to Locatable Mineral from Visual Resources has been added to the Proposed RMP/Final EIS.

86-4 Numerous project driven cultural resource inventories have been performed in Railroad Valley, leading to the identification of hundreds of sites. These data for making statistical projections or developing predictive models may not be totally reliable, however, the data are extremely useful for developing preliminary ideas concerning the ages of the sites that will be encountered in the valley, the kinds of cultural features and artifacts that can be expected, and where sites are most likely to be encountered.

86-5 See response to 6-1 and 64-1.

86-6 Of the proposed 15,470 acre Railroad Valley ACEC, the NSO designation is only applied to 3,480 acres for the protection of riparian values and sensitive species habitat. Vehicle use would be restricted to existing roads and trails in the ACEC. Existing leases, however, would only be subject to the restrictions stipulated when the lease was issued. Leases issued after the completion of the RMP will be affected by the new designation.

86-7 The best available information was used to develop the Draft RMP/EIS. The various economic parameters are in a constant state of flux, as are laws and regulations. The uncertainty of economic and legislative forecasting, the acquisition of resource data and constantly changing demographics are the reasons the RMP must be a dynamic document and will be revised as additional information becomes available over the next 20 years (life of the plan).

86-8 See response to 86-4.

86-9 The more precise quantifications of impacts would be so speculative as to have little meaning and could be misleading. The basis for expecting a slight or insignificant adverse economic impact is because of the relatively small area affected by restrictions, the limited nature of the restrictions, and relatively small part of the affected areas thought to have a better than "low" potential for mineral development.

86-10 Maps 34 through 40 in the Draft RMP/EIS showed withdrawals considered in the various alternatives. Maps 39 and 40 in the Draft RMP/EIS also showed withdrawals proposed in the preferred alternative. Other maps depict OHV restrictions, ACECs, Visual Resource classifications and other resource management concerns that may affect mineral development to some extent. In the interest of brevity and clarity the maps were chosen to serve a multi-disciplinary interpretation of the RMP.

LETTER 87 - NEVADA STATE CLEARINGHOUSE, NEVADA DIVISION OF WILDLIFE

87-1 Activity plans such as HMPs, AMPs and HMAPs are mechanisms used to implement goals and objectives of land-use plans. It is not necessary to reference their development in the RMP.

87-2 See response to 85-7.

Chapter 2 has been modified to clarify that wildlife numbers will be reduced only if they are determined through monitoring to be the offending animal.

87-3 Utilization levels are determined using methods described in Nevada Rangeland Handbook, 1984. Utilization levels are not averaged. Refer to Chapter 2, Forage Allocation section.

87-4 Bighorn sheep reintroductions and augmentations were included in Management Determinations Common To All Alternatives, Fish and Wildlife Habitat, Determination 4, in Chapter 2 of the Draft RMP/EIS. This information is incorporated into the Proposed RMP/Final EIS.

87-5 Alternative 1 (No Action) of the Draft RMP/EIS represented the decisions from existing land use plans. There is currently no ongoing management specifically for ferruginous hawk habitat. Management of special status species as the ferruginous hawk is addressed in the Standard Operating Procedures section of the Proposed RMP/Final EIS. Upland bird introduction, reintroduction or augmentation has been added to the Proposed RMP/Final EIS.

87-6 See response to 83-8.

87-7 The listed priorities for HMP development has been deleted from the Proposed RMP/Final EIS. Priority of HMPs will be established based on presence of T & E species, special status species, big game and upland game bird species, and riparian areas. The potential for rehabilitation of degraded habitats is also considered, giving those areas with high potential higher priority. It should also be noted that the Bullfrog HMP was inadvertently listed as a completed document in the Draft RMP. It has not been finalized and will be given top priority.

87-8 The various wildlife and riparian values in Railroad Valley will still be protected with the reduction in acreage withdrawn.

87-9 See responses to 85-7 and 85-19.

87-10 BLM guidelines regarding domestic sheep management in bighorn sheep habitat will be followed. Refer to Standard Operating Procedures for Fish and Wildlife.

87-11 See response to 85-12.

87-12 Errors noted. Maps have been corrected in coordination with NDOW biologists.

87-13 This section has been revised to include more information relating to wildlife species. Generally, the shrub species are utilized by big game, cattle and horses. Rice grass and galleta grass occur through out these ecological sites. Needlegrass and bluegrass are rare on the drier salt desert shrub ecological sites.

Greasewood was included in with salt desert shrub vegetation under less productive ecological sites. Only 4% of the Resource Area is hot desert, specifically Mojave desert transition zones.

Ephemeral classification was not considered appropriate since the only portion of the Resource Area fitting the ephemeral definition is the extreme northern edge of Amargosa Valley southwest of Beatty.

87-14 Studies conducted in previous years in accordance with BLM Manual 6630, Big Game Studies do, in fact, indicate 69% of deer habitat to be in good or better condition. Range conditions in Appendix 8 relate to livestock only.

Also see response to 87-12.

87-15 Locations of specific study sites may be obtained at the Tonopah Resource Area office. The studies are considered acceptable indicators of wildlife habitat.

87-16 It was not the intent of this paragraph to list every area in the Resource Area where deer winter range occurs.
Also see response to 87-12.

87-17 Pronghorn study information is in the process of being reevaluated and has been deleted from the Proposed RMP/Final EIS. Study information will be provided to NDOW as it becomes available.

87-18 Text in Chapter 3 has been revised to reflect that seasonally conflicts can occur between with bighorn sheep and/livestock, and/or wild horses/burros.

87-19 Big Smoky Valley and Fish Lake Valley have been added to the text.

87-20 A list of raptor species occurring in the Resource Area is available at the Tonopah Resource Area Office.

87-21 Table 3 B has been revised to include additional Category 2 species.

87-22 Text has been revised to reflect that desert tortoise is listed federally and state as threatened.

87-23 Fish and Wildlife, Determination 8 has been added to the Proposed RMP/Final EIS to allow for the introduction, reintroduction or augmentation of all candidate species, if such action is deemed appropriate.

87-24 Text has been revised to reflect that riparian areas, including springs and seeps,

provide habitat which is critical to many wildlife species.

87-25 See response to 83-8.

Due to current funding constraints, it is unlikely the Resource Area will conduct nongame habitat inventories in the near future.

87-26 Sustained yield basis references the amount of cord wood that can be harvested on an annual basis without consequential reductions in annual production in the Resource Area. 71% of the sustained yield was sold due to current demand. However, over-cutting of greenwood areas will be prevented by following guidelines as provided in the Proposed RMP/Final EIS, Forestry and Vegetative Products, Determination 1. The sustained yield would be increased by 530 cords, to 1715 cords per year, should the 14,300 "operable" acres located in WSA's become available.

87-27 See response to 83-7.

87-28 See response to 42-5.

87-29 Guidelines for condition and utilization are included in the Forage Allocation section of Chapter 2 of the Proposed RMP/Final EIS.

87-30 Error noted. This sentence has been dropped from the Proposed RMP/Final EIS.

87-31 Error noted. Text in Chapter 3 has been modified. Impacts to vegetation from rangeland improvements and livestock grazing management are discussed in Chapter 4.

Chapter 3 discusses conflicts between mule deer, livestock and wild horses and burros. Text has been modified to include a statement that conflicts for forage and water exist between pronghorn, livestock and wild horses/burros.

87-32 See response to 83-7.

The theft of Joshua Trees has not been analyzed.

87-33 Joshua trees occur on a number of different ecological sites in a parts of the salt desert shrub and sagebrush types. Creosote and blackbrush are included in the hot desert vegetation type.

87-34 As provided in the Standard Operating Procedures for Lands, no sage grouse strutting grounds will be disposed of. Management of sage grouse habitat will be in accordance with procedures specified in Western States Sage Grouse Guidelines and the MOU between the BLM and NDOW.

87-35 Mountain quail has been added to Table 3 B.

Also see response to 87-5 and 87-21.

87-36 Map 15 in the Proposed RMP/Final EIS (formerly Map 19 in the Draft RMP/EIS) has been corrected to include Tule Canyon.

87-37 Livestock grazing due to the closure of Toiyabe Bench has not been impacted as AUMs in the allotment have not been reduced. Livestock management is directed through the Tonopah Management Framework Plan and Tonopah Grazing EIS. Livestock adjustments are made through monitoring and the evaluation program.

87-38 All reference to reasonable numbers has been deleted. Text in Chapter 4 of the Draft RMP/EIS related to Alternative 1. Chapter 4 of the Proposed RMP/Final EIS has been revised to clarify relationship between livestock grazing and wildlife habitat management.

87-39 Where water development will result in provision of a perennial source, wildlife would be positively benefitted. However, where the water source results in periodic or seasonal availability, benefits to wildlife would be limited.

87-40 Standard Operating Procedures for Livestock Grazing Management provide for protective fencing.

Also see response to 85-12.

87-41 Some important deer winter range occurs south of Hot Creek Canyon. Public land north of Hot Creek Canyon is administered by the USFS and is not discussed in this plan.

87-42 Wildlife numbers will be established through Forage Allocation and Wildlife determinations in Chapter 2 of the Proposed RMP/Final EIS.

87-43 The areas presently closed to leasing that are proposed to be opened with restriction are in Little Fish Lake Valley, Railroad Valley and Monitor Valley. See Map 34 of the Proposed RMP/Final EIS (formerly Map 59 in the Draft RMP/EIS).

87-44 See response to 85-12.

87-45 Land disposals will be in accordance with the Standard Operating Procedures.

87-46 The intent of the proposed land disposal is to make lands available for community expansion and private economic development and to increase the potential for economic diversity.

87-47 See response to 87-43.

87-48 See response to 87-11.

87-49 See response to 87-46.

87-50 Each project will have a cost benefit analysis performed as well as a NEPA analysis. The majority of fencing consists of highway right-of-way fencing and allotment boundary fencing.

87-51 See response to 87-28.

87-52 Adjustments to livestock, wild horses and burros and wildlife will be made utilizing the methods described under Forage Allocation in the Proposed RMP/Final EIS.

87-53 Cultural resources are managed in conformance with laws and implementing regulations as cited in Chapter 2 of the Proposed RMP/Final EIS.

LETTER 90 - DOLAR OIL PROPERTIES

90-1 Rights attending existing leases will continue to be recognized, subject to existing stipulations.

90-2 Rights related to development and surface use or occupancy and stipulations attached to existing leases will continue unaffected by the RMP. In some cases stipulations attaching to approvals for certain proposed activities might be affected by the RMP.

90-3 Pipelines may be included within the rights-of-way corridors, or permitted separately through the FLPMA right-of-way process.

LETTER 91 - THE NATURE CONSERVANCY

91-1 Error noted. The Nevada Natural Heritage Program, *Sensitive Species of Nevada, 1993* compiled for the Battle Mountain District was consulted and the missing candidate species added to the appropriate tables, and text.

91-2 As stated in the Standard Operating Procedures for Special Status Species, actions affecting candidate species will be reviewed on a case-by-case basis and negative impacts will be avoided or mitigated.

Also see response to 87-23.

91-3 Impacts to sensitive species in these areas will be addressed in the Special Recreation Management Area plans.

LETTER 93 - WHITE MOUNTAIN RANCH, JIM BOYCE

93-1 Table 3 C has been revised to included an unconfirmed presence of Brown Trout in Perry Aiken Creek.

93-2 Population projections utilized in Table 3 L were the best available at that time. The 1995 forecast data were preliminary estimates provided by the Nevada State Demographer, Department of Administration, State of Nevada.

93-3 The earnings data depicted in Table 3 M accurately describe the direct income associated with the major industrial classifications. The data represent wages, salaries, other labor income and proprietor income. The information is derived from the U. S. Department of Commerce, Regional Economic Information System, which utilizes raw data reported by the Nevada Department of Employment Security. The $4.8 million figure discussed on Chapter 3 is described correctly as <u>cash receipts from marketings</u>. Cash receipts represent total sales revenues which must cover all operating expenses including wages, salaries, other labor income, and proprietors income.

93-4 See response to 43-25.

CHAPTER 6

PREPARERS AND REVIEWERS

The Tonopah Proposed RMP/Final EIS was prepared by an interdisciplinary team of resource specialists from the Tonopah Resource Area. Battle Mountain District and Nevada State Office resources, minerals and management staff. Table 6-A lists the names and experience of each team member.

The Tonopah Proposed RMP/Final EIS was reviewed by resource specialists, planning and management staff within the Tonopah Resource Area, District and Nevada State offices of the BLM. Reviewers and review responsibilities are listed in Table 6-B.

TABLE 6-A
LIST OF PREPARERS

Name	Responsibility	Education	Experience
Theodore Angle	Policy Guidance and Decision Making, Editorial Support	B.S. Wildlife Management	21 years BLM
Mark Biddlecomb	Wildlife, Special Status Species, Riparian, Forestry and Vegetative Products (from 7/1/92)	B.S. Fisheries and Wildlife Management M.S. Wildlife Management	2 years BLM
Larry Brown	Geology and Minerals	B.S. Physical Science, M.S. Geology	5 years BLM 15 years other Government 5 years Industry
Kevin Finn	Lands, Utility Corridors (from 10/1/93)	B.A. Government History	1 year BLM 10 years Industry 10 years other Government
Lee Grover	Wildlife, Special Status Species, Riparian, Forestry and Vegetative Products (to 11/91)	B.S. Wildlife Conservation	25 years BLM 12 years Industry
Patricia A. Hicks	Cultural Resources	B.A. Anthropology M.A. Anthropology Archaeology	1 year BLM 17 years Industry
Tom Hilken	Fire Management	B.S. Biology M.S. Range Management	3 years BLM 10 years other Government
Doris Kleinheitz	Wild Horses and Burros	B.S. Wildlife Management	2 years BLM
June Manhire	Administrative Support	High School	9 years BLM
Valerie Metscher	Vegetation	B.S. Range Science	13 years BLM

TABLE 6-A
(continued)
LIST OF PREPARERS

Name	Responsibility	Education	Experience
Paul Myers	Social Economics	B.S. Economics	14 years BLM
John Noneman	Administrative Support	B.S. Environmental Sciences	5 years BLM
Roger Oyler	Livestock Grazing Management, Fire Management (to 10/92)	B.S. Range Science	16 years BLM
Gordon Pine	Geology and Minerals	B.A. Geology M.S. Geology Ph.D. Geology	2 years BLM 22 years Industry
Tom Pogacnik	Recreation, Wilderness, ACECs, Visual Resources (to 6/91)	B.S. Wildlife Management, M.S. Range Management	8 years BLM
Diane Ross	Lands, Utility Corridors (to 4/92)	B.A., M.A., Ph.D. English	13 years BLM
Victor Ross	Geology and Minerals (to 4/92)	B.S. Mining Engineer	12 years BLM
Allesa Sparks	Editorial Assistance, Administrative Support, Typing	High School	12 years BLM
Michael Stewart	RMP Team Leader (10/1/93 to 6/8/94)	B.S. Range Management	8 years BLM 4 years other Government
Mark Swinney	Livestock Grazing Management, Fire Management (from 5/1/93)	B.S. Wildlife Management	1 year BLM 17 years other Government
Margaret Waski	Cultural Resources (to 8/91)	B.A. Anthropology	7 years BLM
Dave Wolf	Recreation, Wilderness, Visual Resources (to 4/92)	B.S. Wildlife Biology B.S. Outdoor Recreation	16 years BLM
Hal Zabriskie	RMP Team Leader (to 9/30/93)	B.S. Agriculture	23 years BLM

TABLE 6-B
LIST OF REVIEWERS

Name	Program/Title	Office	Review Responsibility
Theodore Angle	Area Manager	Tonopah Resource Area	Complete Document
Pat Barker	Archaeologist	Nevada State Office	Cultural Resources
Neal Brecheisen	Geologist	Nevada State Office	Oil and Gas
Osborne Casey	Fisheries Biologist	Nevada State Office	Fisheries, Woodland Management
Mary Craggett	Realty Specialist	Battle Mountain District Office	Lands & Realty, Utility Corridors
Duane Crimmins	Range Conservationist	Battle Mountain District Office	Range and Riparian
James Currivan	District Manager	Battle Mountain District Office	Entire Document
Dave Davis	District Forester	Battle Mountain District Office	Woodland Management
Jess Dingman	Fire Management Officer	Nevada State Office	Fire Management
Genivieve Hannon	Natural Resource Specialist	Battle Mountain District Office	Riparian
Tom Hilken	Fire Management Officer	Battle Mountain District Office	Fire Management
Brad Hines	Range Conservationist	Nevada State Office	Livestock Grazing Management
Richard Hoops	Geologist	Nevada State Office	Geothermal Resources
Jim McLaughlin	Soil Scientist	Nevada State Office	Soil, Air, Water
Roberta McGonagle	Archaeologist	Battle Mountain District Office	Cultural Resources
Michael Mitchel	Associate District Manager	Battle Mountain District Office	Complete Document, Battle Mountain Review Team Leader
Tracey Pharo	Recreation Planner	Battle Mountain District Office	Recreation
Tom Pogacnik	Wild Horse and Burro Specialist	Nevada State Office	Wild Horses and Burros
Ned Slagle	Geologist	Battle Mountain District Office	Geology and Minerals
Steve Smith	Recreation Planner	Nevada State Office	Recreation, VRM, Wilderness
Christopher Stubbs	Planning and Environmental Coordinator	Battle Mountain District Office	Entire Document
John Snow	Geologist	Nevada State Office	Fluid Minerals
Larry Steward	Geologist	Nevada State Office	Locatable Minerals

TABLE 6-B
(Continued)
LIST OF REVIEWERS

Name	Program/Title	Office	Review Responsibility
Ken Stowers	Realty Specialist	Nevada State Office	Land & Realty, Utility Corridors
Neil Talbot	Regional Planner	Nevada State Office	Review Team Leader, Complete Document
Curtis Warrick	Wildlife Biologist	Nevada State Office	Wildlife Habitat, Sensitive Plant and Animal Species
Jeff Weeks	Range Conservationist	Battle Mountain District Office	Livestock Grazing Management
John Winnepenninkx	Wild Horse and Burro Specialist	Battle Mountain District Office	Wild Horses and Burros, Wildlife, Sensitive Plant and Animal Species

APPENDIX 1
GENERAL LIST OF DESIRED PLANT COMMUNITY (DPC) SPECIES

VEGETATIVE TYPE	ASSOCIATED ECOLOGICAL SITES	DPC KEY SPECIES
SALT DESERT SHRUB	29-12 Sandy, 5-8" Precipitation Zone (p.z.)	Indian ricegrass Sand dropseed Fourwing saltbush Winterfat
	29-16 Loamy Upland, 5-8" p.z.	Indian ricegrass Galleta Spiny hopsage Nevada ephedra Fourwing saltbush Winterfat
	29-17 Loamy, 5-8" p.z.	Indian ricegrass Galleta Shadscale Bud sagebrush Winterfat
	29-20 Silty, 5-8" p.z.	Indian ricegrass Winterfat Bud sagebrush
	29-22 Sodic Hill, 5-8" p.z.	Galleta Indian ricegrass Shadscale Bud sagebrush Winterfat Nevada ephedra
	29-34 Sandy, 3-5" p.z.	Indian ricegrass Fourwing saltbush Cooper wolfberry Nevada dalea
	29-36 Cobbly Loam, 5-8" p.z.	Indian ricegrass Galleta Spiny menodora Bailey greasewood Shadscale Nevada ephedra
	29-42 Coarse Silty, 5-8" p.z.	Indian ricegrass Galleta Squirreltail Winterfat Bud sagebrush Fourwing saltbush
	29-46 Sandy Loam, 5-8" p.z.	Indian ricegrass Galleta Fourwing saltbush Winterfat Bud sagebrush Spiny hopsage

Continued on next page

APPENDIX 1 (Continued)
GENERAL LIST OF DESIRED PLANT COMMUNITY (DPC) SPECIES

VEGETATIVE TYPE	ASSOCIATED ECOLOGICAL SITES	DPC KEY SPECIES
SALT DESERT SHRUB (continued)	29-48 Outwash, 5-8" p.z.	Basin wildrye Fourwing saltbush
	29-87 Gravelly Loam, 5-8" p.z.	Indian ricegrass Galleta Bailey greasewood Shadscale Bud sagebrush
SAGEBRUSH	29-3 Loamy Bottom, 8-12" p.z.	Basin wildrye Creeping wildrye Basin big sagebrush
	29-6 Loamy, 8-10" p.z.	Indian ricegrass Needleandthread Big sagebrush (Wyo.) Fourwing saltbush
	29-8 Shallow Calcareous Loam 8-10" p.z.	Indian ricegrass Needleandthread Black sagebrush Cliffrose Bitterbrush
	29-10 Loamy Slope, 8-10" p.z.	Needleandthread Indian ricegrass Big sagebrush (Wyo.) Nevada ephedra
	29-29 Shallow Calcareous Slope 12-14" p.z.	Beardless wheatgrass Black sagebrush Cliffrose Bitterbrush
ALKALINE MEADOWS AND BOTTOMS	29-2 Saline Meadow, 3-8" p.z.	Alkali sacaton Inland saltgrass Baltic rush Basin wildrye
	29-4 Saline Bottom, 3-8" p.z.	Basin wildrye Alkali sacaton Inland saltgrass Black greasewood Rabbitbrush

Continued on next page

APPENDIX 1 (Continued)

GENERAL LIST OF DESIRED PLANT COMMUNITY (DPC) SPECIES

VEGETATIVE TYPE	ASSOCIATED ECOLOGICAL SITES	DPC KEY SPECIES
MOUNTAIN MAHOGANY	29-27 Mahogany Thicket, 16-20" p.z.	Needlegrasses Basin wildrye Mountain big sagebrush Snowberry Curlleaf mountain mahogany
	29-40 Limestone Hill, 10-14" p.z.	Needlegrasses Indian ricegrass Littleleaf mountain mahogany Black sagebrush Ephedra
RIPARIAN	29-1 Wet Meadow, 8-12" p.z.	Sedge Rush Nevada bluegrass Meadow barley
WOODLANDS	29-66 Woodland, 12-16" p.z.	Pinyon pine Utah juniper Mountain big sagebrush Cliffrose Needlegrasses
	29-69 Woodland, 12-16" p.z.	Pinyon pine Utah juniper Black sagebrush Cliffrose Bluegrass

APPENDIX 2
KEY SPECIES BY ALLOTMENT [1]

Allotment	Key Species
Blue Eagle	
	Winterfat
	Indian ricegrass
	Bud sagebrush
	Fourwing saltbush
	Basin wildrye
	Inland saltgrass
	Alkali sacaton
	Sand dropseed
Butterfield	
	Indian ricegrass
	Alkali sacaton
	Galleta
	Inland saltgrass
	Squirreltail
Crater-Black Rock	
	Winterfat
	Indian ricegrass
	Galleta
	Needleandthread
	Fourwing saltbush
Currant Ranch	
	Bluebunch wheatgrass
	Bitterbrush
Forest Moon	
	Bluebunch wheatgrass
	Bitterbrush
Francisco	
	Sand dropseed
	Galleta
	Indian ricegrass
	Winterfat
	Fourwing saltbush
	Squirreltail
	Nevada ephedra
	Basin wildrye
	Inland saltgrass
Hot Creek	
	Indian ricegrass
	Winterfat
	Galleta
	Needleandthread
	Fourwing saltbush
	Bitterbrush
Hunts Canyon	
	Indian ricegrass
	Winterfat
	Galleta
	Fourwing saltbush
	Needleandthread
	Squirreltail
Ice House	
	Winterfat
	Indian ricegrass
	Shadscale
	Alkali sacaton
	Inland saltgrass
Ione	
	Indian ricegrass
	Winterfat
	Sandberg bluegrass
	Galleta
	Nevada ephedra
	Black sagebrush
	Squirreltail
Magruder Mountain	
	Indian ricegrass
	Winterfat
	Crested wheatgrass
	Galleta
	Alkali sacaton
	Squirreltail

Continued on next page

APPENDIX 2 (Continued)

Allotment	Key Species
Monitor	
	Basin wildrye
	Indian ricegrass
	Winterfat
	Inland saltgrass
	Crested wheatgrass
	Squirreltail
	Mat muhly
	Baltic rush
	Sedge
Monte Cristo	
	Indian ricegrass
	Galleta
	Fourwing saltbush
	Winterfat
	Nevada ephedra
	Shadscale
Montezuma	
	Indian ricegrass
	Winterfat
	Galleta
	Desert needlegrass
	Fourwing saltbush
Morey	
	Winterfat
	Bitterbrush
	Fourwing saltbush
	Basin wildrye
	Needleandthread
	Galleta
	Indian ricegrass
	Shadscale
Nyala	
	Indian ricegrass
	Winterfat
	Galleta
	Sand dropseed
	Alkali sacaton
	Squirreltail
	Inland saltgrass
	Needleandthread
	Fourwing saltbush
Ralston	
	Winterfat
	Indian ricegrass
	Shadscale
	Galleta
	Fourwing saltbush
	Sand dropseed
	Squirreltail
Razorback	
	Desert needlegrass
	Nevada ephedra
	Winterfat
	Fourwing saltbush
	Indian ricegrass
Red Spring	
	Indian ricegrass
	Winterfat
	Fourwing saltbush
	Squirreltail
	Galleta

Continued on next page

APPENDIX 2 (Continued)

Allotment	Key Species
Reveille	
	Indian ricegrass
	Winterfat
	Fourwing saltbush
	Galleta
	Green Molly Kochia
	Squirreltail
	Sand dropseed
	Bud sagebrush
	Needleandthread
San Antone	
	Indian ricegrass
	Winterfat
	Galleta
	Sand dropseed
	Shadscale
	Green Molly Kochia
	Nevada ephedra
	Fourwing saltbush
	Squirreltail
Sand Springs	
	Indian ricegrass
	Winterfat
	Squirreltail
	Galleta
	Thickspike wheatgrass
	Black sagebrush
	Needleandthread
	Sand dropseed
	Sandberg bluegrass
Sheep Mountain	
	Indian ricegrass
	Galleta

Allotment	Key Species
Silver King	
	Indian ricegrass
	Galleta
Silver Peak	
	Needleandthread
	Baltic rush
	Inland saltgrass
	Alkali sacaton
	Winterfat
	Black sagebrush
	Indian ricegrass
	Basin wildrye
	Sandberg bluegrass
	Shadscale
	Galleta
Smoky	
	Indian ricegrass
	Alkali sacaton
	Basin wildrye
	Alkali bluegrass
	Squirreltail
	Galleta
	Sand dropseed
	Baltic rush
	Alkali cordgrass
	Nevada ephedra
	Inland saltgrass
	Bud sage
Springdale #2	
	Indian ricegrass
	Inland saltgrass
	Winterfat

Continued on next page

APPENDIX 2 (Continued)

Allotment	Key Species
Stone Cabin	
	Indian ricegrass
	Galleta
	Winterfat
	Fourwing saltbush
	Bitterbrush
	Needleandthread
	Baltic rush
	Squirreltail
	Inland saltgrass
	Sandberg bluegrass
	Nevada ephedra
Wagon Johnnie	
	Indian ricegrass
	Crested wheatgrass
	Winterfat
	Basin wildrye
	Sandberg bluegrass
	Squirreltail
	Needleandthread
	Baltic rush
	Alkali cordgrass
	Inland saltgrass
	Alkali bluegrass
	Mat Muhly
Willow Creek	
	Needleandthread
	Indian ricegrass
	Bitterbrush
White Sage	
	Indian ricegrass
	Winterfat
White Wolf	
	Indian ricegrass
	Winterfat
	Fourwing saltbush
	Alkali sacaton
	Inland saltgrass

Allotment	Key Species
Yellow Hills	
	Indian ricegrass
	Galleta
	Winterfat
	Fourwing saltbush

[1] The list of key species provided by allotment is general in nature. Additions or deletions may be made as determined necessary.

APPENDIX 3

VISUAL RESOURCE MANAGEMENT CLASSES

1. Class I. This class provides primarily for natural ecological changes; however, it does not preclude limited management activity. Any contrast created within the characteristic environment must not attract attention. It is applied to wilderness areas, some natural areas, wild portions of the wild and scenic rivers, and other similar situations where management activities are to be restricted.

2. Class II.* Changes in any of the basic elements (form, line, color, texture) caused by a management activity should not be evident in the characteristic landscape. A contrast may be seen but should not attract attention.

3. Class III.* Contrasts to the basic elements (form, line color, texture) caused by a management activity may be evident and begin to attract attention in the characteristic landscape. However, the changes should remain subordinate to the existing characteristic landscape.

4. Class IV.* Contrasts may attract attention and be a dominant feature of the landscape in terms of scale; however, the change should repeat the basic elements (form, line, color, texture) inherent in the characteristic landscape.

*Structures located in the foreground distance zone (0-½ mile) often create a contrast that exceeds the VRM class, even when designed to harmonize and blend with the characteristic landscape. This may be especially true when a distinctive architectural motif or style is designed. Approval by the Area Manager is required on a case-by-case basis to determine whether the structure(s) meet the acceptable VRM class standards and, if not, whether they add acceptable visual variety to the landscape.

APPENDIX 4
OFF-HIGHWAY VEHICLE DEFINITIONS

1. "Off-Highway vehicle" - any motorized vehicle capable of, or designed for, travel on or immediately over bare land or other natural terrain, excluding: (1) any military, fire, search and rescue, or law enforcement vehicle while being used for emergency purposes; (2) any vehicle use expressly approved by the authorized officer; (3) vehicles in official use; and (4) any combat support vehicle when used in times of national defence emergency.

2. "Official use" - use by an employee, agent or designated representative of the federal government or one of its contractors, in the course of carrying out duties.

3. "Trail" - an unmaintained way. For example, a jeep 2-track or an ATV/motorcycle track.

4. "Open area" - an area where motorized vehicle use is permitted both on and off-road.

5. "Closed area" - an area where motorized vehicle use is prohibited. Use of vehicles in closed areas may be approved by the authorized officer for special purposes or legal requirements.

6. "Off-road" - any motorized vehicle use not on an existing road or trail. This refers to cross country travel.

7. "Road" - a way that is improved by mechanical means to ensure relatively regular and continuous use by vehicles. A way maintained solely by the passage of vehicles does not constitute a road.

8. "Roadless" - the absence of roads which have been improved and maintained by mechanical means to ensure relatively regular and continuous use.

9. "Improved and maintained" - actions taken physically by man to keep the road open to vehicular traffic. Improved does not necessarily mean formal construction. Maintained does not necessarily mean annual maintenance.

10. "Limited to existing roads and trails" - motorized vehicle use permitted on all roads and trails in the area unless otherwise signed as closed. Motorized vehicle use is not permitted on roads and trails that have been physically closed through reclamation actions. BLM will not prepare an activity plan/map for areas that are limited to existing roads and trails. All authorized public land users that hold a permit or license (i.e. grazing permittees, wood permits, hunting license, right-of-way holders, mining claim, etc.) may drive off-road if required to fulfill requirements of their permit or license. Motorized vehicles must park within 100 yards of an existing road or trail for camping. All off-road vehicle use must be limited to the minimum necessary to accomplish the task and to prevent undue or necessary degradation to the area. Organized events, wood cutting and land treatment projects will be handled on a case-by-case basis. Emergency services and/or law enforcement activities are exceptions to these policies.

APPENDIX 5
PROPOSED RANGE IMPROVEMENT PROJECTS[1]

ALLOTMENT NAME	NUMBER	TYPE OF IMPROVEMENT	UNITS
Blue Eagle	0089	Fence	18 miles
		Cattleguard	2 each
Butterfield	0073	Fence	18 miles
		Cattleguard	2 each
		Spring Development	3 each
		Trough	5 each
		Pipeline	1 mile
Crater-Black Rock	0087	Fence	26 miles
		Cattleguard	3 each
		Well	2 each
		Trough	2 each
Francisco	0075	Spring Development	2 each
		Trough	4 each
		Pipeline	2 miles
		Vegetation Manipulation	1,400 acres
Hot Creek	0084	Fence	20 miles
		Cattleguard	4 each
		Trough	4 each
		Pipeline	10 miles
Hunts Canyon	0078	Fence	13 miles
		Cattleguard	1 each
		Spring Development	2 each
		Trough	2 each
		Pipeline	5 miles
		Vegetation Manipulation	4,660 acres
Ice House	0095	Well	1 each
		Fence	3.2 miles
Ione	0071	Fence	81 miles
		Cattleguard	7 each
		Well	4 each
		Spring Development	2 each
		Trough	11 each
		Pipeline	13 miles
		Vegetation Manipulation	2,400 acres
Magruder Mountain	0099	Pipeline	7.5 miles
		Fence	9 miles
		Cattleguard	2 each
		Vegetation Manipulation	1,195 acres

Continued next page

APPENDIX 5 (Continued)
PROPOSED RANGE IMPROVEMENT PROJECTS[1]

ALLOTMENT NAME	NUMBER	TYPE OF IMPROVEMENT	UNITS
Monitor	0077	Fence	41 miles
		Cattleguard	7 each
		Well	1 each
		Trough	3 each
		Pipeline	3 miles
		Vegetation Manipulation	8,725 acres
Monte Cristo	0104	Well	2 each
		Pipeline	6 miles
		Trough	4 each
Montezuma	0094	Well	2 each
		Pipeline	5 miles
		Trough	5 each
		Fence	2 miles
Morey	0083	Fence	12 miles
		Cattleguard	3 each
		Spring Development	1 each
		Trough	2 each
		Pipeline	2 miles
Nyala	0088	Fence	38 miles
		Cattleguard	5 each
		Well	3 each
		Trough	6 each
		Pipeline	9 miles
		Earthen Reservoirs	2 each
Ralston	0076	Fence	113 miles
		Cattleguard	10 each
		Well	3 each
		Trough	7 each
		Pipeline	17 miles
Razorback	0093	Well	1 each
Red Springs	0091	Pipeline	2.5 miles
		Trough	1 each
		Fence	6.5 miles
Reveille	0085	Fence	140 miles
		Cattleguard	14 each
		Well	2 each
		Trough	4 each
		Pipeline	5 miles
San Antone	0073	Fence	85 miles
		Cattleguard	16 each
		Spring Development	5 each
		Trough	12 each
		Pipeline	35 miles

Continued next page

APPENDIX 5 (Continued)
PROPOSED RANGE IMPROVEMENT PROJECTS[1]

ALLOTMENT NAME	NUMBER	TYPE OF IMPROVEMENT	UNITS
Sand Springs	0086	Fence Cattleguard Well Trough Earthen Reservoir Vegetation Manipulation	63 miles 7 each 2 each 2 each 3 each 10,000 acres
Silver Peak	0097	Pipeline Spring Development Trough Fence	1.25 miles 5 each 5 each 21.5 miles
Smoky	0074	Fence Cattleguard Spring Development Trough Pipeline	52 miles 2 each 1 each 1 each 3 miles
Stone Cabin	0082	Fence Cattleguard Well Spring Development Trough Pipeline Vegetation Manipulation	87 miles 19 each 2 each 4 each 11 each 13 miles 14,080 acres
White Wolf	0092	Well	1 each

[1] Includes projects for livestock, wild horses/burros, wildlife and watershed proposed in the Tonopah Grazing EIS and Esmeralda/Southern Nye RMP.

APPENDIX 6
CURRENT FORAGE ALLOCATIONS-TONOPAH (EAST)

ALLOTMENT	ALLOTMENT ACRES	INITIAL STOCKING LEVELS FOR LIVESTOCK	INITIAL HERD SIZES FOR WILD HORSES AND BURROS
Blue Eagle	45,499	2,024 AUMs	0 AUMs
Butterfield	122,080	4,779 AUMs	0 AUMs
Crater-Black Rock	97,859	5,725 AUMs[1]	0 AUMs
Currant Ranch	501	282 AUMs	0 AUMs
Forest Moon	297	253 AUMs	0 AUMs
Francisco	16,896	1,206 AUMs[1]	0 AUMs
Hot Creek	154,483	7,938 AUMs[2]	492 AUMs for 41 horses[2]
Hunts Canyon	93,558	2,237 AUMs[1]	90 AUMs horses for 6 months in the Saulsbury HMA[5]
Ione	189,099	10,421 AUMs[1]	0 AUMs
Monitor	92,463	3,862 AUMs[1]	0 AUMs
Morey	72,806	1,643 AUMs[2]	0 AUMs
Nyala	321,274	16,157 AUMs[1]	0 AUMs
Ralston	368,682	14,695 AUMs[1]	120 AUMs for 10 horses[5]
Reveille	657,520	25,730 AUMs[1]	1,980 AUMs for 145 to 165 horses[3]
San Antone	440,826	13,505 AUMs[1]	0 AUMs
Sand Springs	203,868	8,665 AUMs[1]	588 AUMs for 49 horses[4]
Smoky	126,976	5,697 AUMs[1]	0 AUMs
Stone Cabin	389,499	13,963 AUMs[1]	4,368 AUMs for 364 horses[4]

Continued on next page

APPENDIX 6 (Continued)
CURRENT FORAGE ALLOCATIONS-TONOPAH (EAST)

ALLOTMENT	ALLOTMENT ACRES	INITIAL STOCKING LEVELS FOR LIVESTOCK	INITIAL HERD SIZES FOR WILD HORSES AND BURROS
Wagon Johnnie	28,157	1,219 AUMs[2]	468 AUMs for 39 horses[2]
Willow Creek	12,691	338 AUMs	54 AUMs for 6 horses for 9 months

[1] From the 12/88 Rangeland Program Summary

[2] The AUMs shown here have been adjusted as a result of the "National Forest and Public Lands of Nevada Enhancement Act of 1988." The information shown is for the portion of the allotments remaining in BLM control. The Act transferred administration of approximately 26.9% of the lands in the Morey Allotment, 13.6% of the lands in the Hot Creek Allotment, and 72.1% of the lands in the Wagon Johnnie Allotment to the Forest Service.

[3] Directed by 1987 Court Decision (Civil R-85-535 BRT) Fallini vs. Hodel.

[4] Area Manager's Management Action Selection Report of 3/24/89.

[5] Wild horses drift on to public lands from the Monitor Wild Horse Territory which is administered by the U. S. Forest Service.

APPENDIX 7
CURRENT FORAGE ALLOCATIONS-TONOPAH (WEST)

ALLOTMENT	ALLOTMENT ACRES	INITIAL STOCKING LEVELS FOR LIVESTOCK	INITIAL HERD SIZES FOR WILD HORSES AND BURROS[2]
Fish Lake Valley	1,482	52 AUMs	0 AUMs
Ice House	43,143	201 AUMs[1]	660 AUMs for: 43 horses in Silver Peak HMA; 12 burros in Fish Lake Valley HMA.
Magruder Mountain	625,015	12,348 AUMs	2,496 AUMs for: 184 horses in Palmetto HMA; 19 horses in Gold Mountain HMA; 5 horses in Montezuma HMA.
Monte Cristo	496,018	9,352 AUMs	828 AUMs for 69 horses in Dunlop HMA.
Montezuma	538,297	10,668 AUMs	8,424 AUMs for: 12 horses and 194 burros in Bullfrog HMA; 227 horses and 71 burros in Goldfield HMA; 151 horses in Montezuma HMA; 13 horses and 34 burros in Stonewall HMA.
Razorback	72,880	1,344 AUMs	288 AUMs for 24 burros in Bullfrog HMA.
Red Springs	137,267	2,609 AUMs[1]	1,008 AUMs for: 62 horses in Fish Lake Valley HMA; 22 horses in Silver Peak HMA.
Sheep Mountain	88,435	1,740 AUMs	492 AUMs for 41 horses in Paymaster/Lone Mountain HMA.
Silver King	8,969	150 AUMs	0 AUMs
Silver Peak	283,907	5,699 AUMs	1,764 AUMs for: 147 horses in Silver Peak HMA, 0 in Fish Lake Valley HMA.
Springdale	1,466	24 AUMs	0 Bullfrog HMA.
White Sage	10,315	600 AUMs	0 Silver Peak HMA.
White Wolf	59,310	501 AUMs	1,068 AUMs for 89 horses in Silver Peak HMA.
Yellow Hills	62,203	1,212 AUMs	60 AUMs for: 5 horses in Montezuma HMA; 0 horses in Paymaster/Lone Mountain HMA.

[1] The AUMs shown have been adjusted as a result of the "National Forest and Public Lands of Nevada Enhancement Act" of 1988. This Act transferred 5% of the Red Springs Allotment 0.5% of the Silver Peak Allotment and 11% of the Ice House Allotment to the Inyo National Forest. The Act also transferred 20% of the Fish Lake Valley Herd Management Area to the Inyo National Forest.

[2] Herd size has been apportioned among allotments within the HMAs based on data as shown in Appendix 10.

APPENDIX 8
ALLOTMENT CATEGORIZATION

ALLOTMENT	RANGE CONDITION			PRODUCTION POTENTIAL			RESOURCE CONFLICTS			PRESENT MANAGEMENT		ECONOMIC RETURNS			MGT CATEGORY
	SAT	UNSAT	UNDEF	HI	MED	LOW	HI	MED	LOW	SAT	UNSAT	YES	MAYBE	NO	M, I, or C
BLUE EAGLE		X				X			X	X				X	C
BUTTERFIELD		X				X			X	X				X	C
CURRENT RANCH			X			X		X		X				X	C
CRATER BLACK ROCK		X		X			X				X		X		I
FISH LAKE VALLEY			X		X				X	X				X	C
FOREST MOON			X			X		X		X				X	C
FRANCISCO			X	X			X			X				X	I
HOT CREEK		X		X			X				X	X			I
HUNTS CANYON			X	X			X				X	X			I
ICE HOUSE			X		X				X				X		M
IONE			X	X			X				X	X			I
MAGRUDER MOUNTAINS			X	X			X				X	X			I
MONITOR			X	X			X				X	X			I
MONTE CRISTO			X			X	X				X	X			I
MONTEZUMA			X	X			X				X		X		I
MOREY		X		X			X				X		X		I
NYALA		X		X			X				X		X		I
RALSTON			X		X		X				X	X			I
RAZORBACK			X			X	X				X			X	I
RED SPRINGS		X				X	X				X			X	I
REVEILLE		X		X			X				X	X			I
SAN ANTONE			X	X			X				X	X			I
SAND SPRINGS		X		X			X				X	X			I
SHEEP MOUNTAIN			X			X			X	X				X	C
SILVER KING			X			X		X		X				X	C
SILVER PEAK			X			X	X						X		M
SMOKY			X	X			X				X		X		I
SPRINGDALE #2			X			X		X		X				X	C
STONE CABIN		X		X			X				X	X			I
WAGON JOHNNIE		X		X			X				X			X	I
WHITE SAGE			X		X				X		X		X		M
WHITE WOLF			X			X	X				X			X	I
WILLOW CREEK		X		X			X				X			X	I
YELLOW HILLS			X			X		X		X				X	C

APPENDIX 9

METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

Future adjustments in livestock active preference and wild horse/burro appropriate management level (AML) will be based on short and long term monitoring data. In cases where use by livestock and wild horses/burros overlap and individual use is indistinguishable, the adjustments will be based on the proportional relationship between livestock and wild horses/burros as established through previous land use plans as shown in Appendix 6 and 7. Examples are provided to illustrate.

SITUATION ONE: Wild horse/burro use exceeds the "thriving natural ecological balance" level and no overlap with livestock use occurs or is expected to occur with a proposed change in management.

Example: Herd Management Area A has 100 wild horses which inhabit the area 12 months of the year. Total actual use is 1,200 animal unit months (AUMs). Monitoring data show the area to be sustaining a weighted average utilization on key forage plants of 65 percent. Desired utilization is 50 percent.

Calculation of Carrying Capacity:

Formula:

$$\frac{\text{Existing Actual Use}^{1}}{\text{Weighted Average Utilization}^{2}} \times \text{Desired Average Utilization}^{3} = \text{Calculated Capacity}^{4}$$

Solve for calculated capacity and adjustment in AML:

$$\frac{1{,}200 \text{ AUMs}}{.65} \times .50 = 923 \text{ AUMs}$$ (calculated capacity for an AML of 77 wild horses for 12 months)

1 Existing actual use is the number of livestock and/or wild horses actually grazing on an area expressed as AUMs.

2 Weighted average utilization is the average utilization of the forage in the area (moderate and above).

3 The desired average utilization is the degree of utilization that will meet the short and long term vegetative objectives for the area.

4 Calculated capacity is the level of use, or number of animals expressed as AUMs, which could graze the area and achieve the desired average utilization.

Conclusion:

The wild horses would be reduced from 100 animals to an AML of 77 horses.

APPENDIX 9 (Continued)

METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

SITUATION TWO: Livestock use exceeds the desired average utilization level and there are no wild horses in the allotment.

Example: Allotment B has 1000 cattle grazing for 12 months of the year. Total actual use is 12,000 AUMs. Results of monitoring show Allotment B to be sustaining a weighted average utilization on key forage plants of 70 percent. The desired average utilization is 50 percent.

Calculation of Carrying Capacity:

Formula:

$$\frac{\text{Existing Actual Use}^{1}}{\text{Weighted Average Utilization}^{2}} \times \text{Desired Average Utilization}^{3} = \text{Calculated Capacity}^{4}$$

Solve for calculated capacity and adjustment in active preference:

$$\frac{12{,}000 \text{ AUMs}}{.70} \times .50 = 8{,}571 \text{ AUMs (calculated capacity for active preference)}$$

1 Existing actual use is the number of livestock and/or wild horses actually grazing on an area expressed as AUMs.

2 Weighted average utilization is the average utilization of the forage in the area (moderate and above).

3 The desired average utilization is the degree of utilization that will meet the short and long term vegetative objectives for the area.

4 Calculated capacity is the level of use, or number of animals expressed as AUMs, which could graze the area and achieve the desired average utilization.

Conclusion:

The livestock use would be reduced from 12,000 AUMs to 8,571 AUMs.

APPENDIX 9 (Continued)

METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

SITUATION THREE: Wild horse use and livestock use overlap. Monitoring data indicate both wild horse and livestock use are contributing to the utilization measured. The combination of both uses exceeds the desired average utilization level.

Example: Allotment C has 1,000 cattle grazing for 12 months of the year. Total actual use by livestock is 12,000 AUMs. Allotment C also contains a Wild Horse Herd Management Area with boundaries that correspond to the boundary of Allotment C. An average population of 100 wild horses has been using the area for 12 months of the year. Total actual use by wild horses is 1,200 AUMs. The total actual use by livestock and wild horses is 13,200 AUMs. Results of monitoring show the area to be sustaining a weighted average utilization on key forage plants of 70 percent. The desired average utilization level is 50 percent.

Calculation of carrying capacity (Step 1):

Formula:

$$\frac{\text{Existing Actual Use}^{1}}{\text{Weighted Average Utilization}^{2}} \times \text{Desired Average Utilization}^{3} = \text{Calculated Capacity}^{4}$$

Solve for calculated capacity:

$$\frac{13{,}200 \text{ AUMs}}{.70} \times .50 = 9{,}429 \text{ AUMs (calculated capacity for livestock and wild horses)}$$

1 Existing actual use is the number of livestock and/or wild horses actually grazing on an area expressed as AUMs.

2 Weighted average utilization is the average utilization of the forage in the area (moderate and above).

3 The desired average utilization is the degree of utilization that will meet the short and long term vegetative objectives for the area.

4 Calculated capacity is the level of use, or number of animals expressed as AUMs, which could graze the area and achieve the desired average utilization.

The land use plan previously established an initial stocking level or active preference for livestock of 12,000 AUMs and an initial herd size or AML for wild horses of 50 animals or 600 AUMs for a total allocation of 12,600 AUMs. The Calculated adjustment is a reduction of **3,171 AUMs** in the combined use of livestock and wild horses. The calculation of the new allocations for livestock and wild horses are shown in the following formulas.

APPENDIX 9 (Continued)

METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

SITUATION 3 (Continued)

Calculation of New Allocation to Livestock (Step 2):

Formula:

$$\text{Initial Stocking Level} - \left(\frac{\text{Initial Stocking Level}}{\text{Total Allocation}} \times \text{Calculated Adjustment} \right) = \text{New Allocation to Livestock}$$

Solve for New Allocation (active preference) for livestock:

$$12{,}000 \text{ AUMs} - \left(\frac{12{,}000 \text{ AUMs}}{12{,}600 \text{ AUMs}} \times 3{,}171 \text{ AUMs} \right) = 8{,}980 \text{ AUMs}$$

Calculation of New Allocation to Wild Horses (Step 3):

Formula:

$$\text{Initial Herd Size} - \left(\frac{\text{Initial Herd Size}}{\text{Total Allocation}} \times \text{Calculated Adjustment} \right) = \text{New Allocation to Wild Horses}$$

Solve for New Allocation (AML) to Wild Horses:

$$600 \text{ AUMs} - \left(\frac{600 \text{ AUMs}}{12{,}600 \text{ AUMs}} \times 3{,}171 \text{ AUMs} \right) = 449 \text{ AUMs}$$

Conclusion:

The new allocation for the Allotment C would be:

Livestock = 8,980 AUMs active preference.
Wild Horse = 449 AUMs for an AML of 37 wild horses.
9,429 AUMs calculated capacity.

APPENDIX 9 (Continued)

METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

SITUATION FOUR: Wild horse use and livestock use overlap. Monitoring data indicate wild horse and livestock use contribute to the utilization measured. The combination of both uses is less then the desired average utilization level. Monitoring data indicate that additional forage is permanently available on a sustained yield basis and land use objectives can be met.

Example: Allotment D has 1,000 cattle grazing for 12 months. Total actual use by livestock is 12,000 AUMs. Allotment D also contains a Wild Horse Management Area with boundaries that correspond to the boundary of Allotment D. An average population of 50 wild horses has been using the area for 12 months. Total actual use by wild horses is 600 AUMs. The total actual use by livestock and wild horses is 12,600 AUMs. Results of monitoring show the area to be sustaining an average overall utilization level of 30 percent. Desired average utilization is 50 percent.

Calculation of carrying capacity (Step 1):

Formula:

$$\frac{\text{Existing Actual Use}^{1}}{\text{Weighted Average Utilization}^{2}} \times \text{Desired Average Utilization}^{3} = \text{Calculated Capacity}^{4}$$

Solve for calculated capacity:

$$\frac{12{,}600 \text{ AUMs}}{.30} \times .50 = 21{,}000 \text{ AUMs (calculated capacity for livestock and wild horses)}$$

1 Existing actual use is the number of livestock and/or wild horses actually grazing on an area expressed as AUMs.

2 Weighted average utilization is the average utilization of the forage in the area (moderate and above).

3 The desired average utilization is the degree of utilization that will meet the short and long term vegetative objectives for the area.

4 Calculated capacity is the level of use, or number of animals expressed as AUMs, which could graze the area and achieve the desired average utilization.

The land use plan previously established an initial stocking level or active preference of 12,000 AUMs for livestock and an initial herd size or AML for wild horses of 50 animals, or 600 AUMs, for a total allocation of 12,600 AUMs. The calculated adjustment is an increase of 8,400 AUMs which could be allocated to livestock and wild horses. The calculation of the new allocations to livestock and wild horses are shown in the following formulas.

APPENDIX 9 (Continued)

METHODOLOGY FOR ADJUSTMENT OF LIVESTOCK AND WILD HORSE/BURRO USE

SITUATION 4 (Continued)

Calculation of New Allocation to Livestock (Step 2):

Formula:

$$\text{Initial Stocking Level} + \left(\frac{\text{Initial Stocking Level}}{\text{Total Allocation}} \times \text{Calculated Adjustment} \right) = \text{New Allocation to Livestock}$$

Solve for New Allocation (active preference) to Livestock:

$$12{,}000 \text{ AUMs} + \left(\frac{12{,}000 \text{ AUMs}}{12{,}600 \text{ AUMs}} \times 8{,}400 \text{ AUMs} \right) = 20{,}000 \text{ AUMs}$$

Calculation of New Allocation to Wild Horses (Step 3):

Formula:

$$\text{Initial Herd Size} + \left(\frac{\text{Initial Herd Size}}{\text{Total Allocation}} \times \text{Calculated Adjustment} \right) = \text{New Allocation to Wild Horses}$$

Solve for New Allocation (AML) to Wild Horses:

$$600 \text{ AUMs} + \left(\frac{600 \text{ AUMs}}{12{,}600 \text{ AUMs}} \times 8{,}400 \text{ AUMs} \right) = 1{,}000 \text{ AUMs}$$

Conclusion:

The new allocation for Allotment D would be:

Livestock	= 20,000 AUMs active preference.
Wild Horse	= 1,000 AUMs or an AML of 83 wild horses.
	21,000 AUMs calculated capacity.

APPENDIX 10 A
WILD HORSES AND BURROS BY ALLOTMENT-TONOPAH (WEST)
(FORMERLY ESMERALDA-SOUTHERN NYE RMP AREA)

Allotments	Herd Management Areas										
	Bullfrog	Dunlap	Fish Lake Valley	Gold Mountain	Goldfield	Montezuma	Palmetto	Paymaster/ Lone Mountain	Silver Peak	Stonewall	Total
Emigrant Peak									3 H		3 H
Fish Lake Valley			0 H								0 H
Ice House			4 H						34 H		38 H
Magruder Mtn.				19 H		21 H	184 H		3 H		227 H
Monte Cristo		69 H	1 H					8 H			78 H
Montezuma	12 H 140 B				227 H 71 B	138 H		3 H		13 H 34 B	393 H 245 B
Razorback	76 B										76 B
Red Spring			54 H 12 B						22 H		76 H 12 B
Sheep Mountain								28 H			28 H
Silver Peak			3 H						193 H		196 H
Springdale #2	2 B										2 B
White Wolf									52 H		52 H
Yellow Hills						2 H		2 H			4 H
Unalloted								7 H			7 H
Total	12 H 218 B	69 H	62 H 12 B	19 H	227 H 71 B	161 H	184 H	48 H	307 H	13 H 34 B	1102 H 335 B

This Appendix presents the initial herd size information from Table 2A on an allotment basis. Since some HMAs overlap allotment boundaries, and since some allotments contain more than one HMA, numbers were derived using the following methodology: 1) proportion of each allotment composing the HMA was established using relative acreage computation; 2) proportion was then applied to initial herd size for the HMA.

H = Horses B = Burros

APPENDIX 10 B
WILD HORSES AND BURROS BY ALLOTMENT-TONOPAH (EAST)
(FORMERLY TONOPAH MFP AREA)

Allotment	Herd Management Areas						
	Hot Creek	Little Fish Lake	Reveille	Sand Springs	Saulsbury	Stone Cabin	Total
Hot Creek	41 H						41 H
Hunts Canyon					11 (6 mos)		11 H
Ralston					14 (6 mos)		14 H
Reveille			145-165 H				145-165 H
Sand Springs				49 H			49 H
Stone Cabin						364 H	364 H
Wagon Johnnie		39 H					39 H
Total	41 H	39 H	145-165 H	49 H	25 H	673 H	683 H

This Appendix presents the initial herd size information from Table 2A on an allotment basis. Since the Saulsbury HMA overlaps the Hunts Canyon and Raitson Allotments, numbers shown in this Appendix were derived using the following methodology: 1) proportion of each allotment composing the HMA was established using relative acreage computation, 2) proportion was then applied to initial herd size for the HMA.

H = Horses B = Burros (none)

APPENDIX 11

EXISTING CLASSIFICATIONS AND WITHDRAWALS

I. CLASSIFICATIONS

TYPE	NUMBER	ACRES
Small Tract	2	8.92
Classification and Multiple Use	4	1,984.00
Recreation and Public Purposes	19	1,534.09
Desert Land Entry	18	5,725.89
Carey Act	4	3,316.42
Airport Leases	4	286.20
	Total	12,855.52

II. WITHDRAWALS

TYPE[1]	NUMBER	ACRES
Air Force	2	619.32
BLM-Power Site Reserve	1	17.00
BLM-Protective (Railroad Valley)	1	14,710.33
BLM-Administrative	1	5.00
Department of Energy	3	2,571.29
Federal Aviation Administration	3	417.77
Federal Energy Regulation Commission	1	45.05
Forest Service Administrative	2	11.40
BLM-Protective (Natural area)	1	520.00
	Total	18,917.16

[1] Does not include non-administrative site lands withdrawn to Forest Service

APPENDIX 12

THE RECREATION OPPORTUNITY SPECTRUM CLASS DESCRIPTIONS

OPPORTUNITY CLASS	EXPERIENCE OPPORTUNITY	SETTING OPPORTUNITY
Primitive	Opportunity for isolation from the sights and sounds of man, to feel a part of the natural environment, to have a high degree of challenge and risk, and to use outdoor skills.	Area is characterized by essentially unmodified natural environment of fairly large size (2,500 acres). Concentration of users is very low and evidence of other users is minimal. The area is managed to be essentially free from evidence of man-induced restrictions and controls. Only facilities essential for resource protection are used. No facilities for comfort or convenience of the user are provided. Spacing of groups is informal and dispersed to minimize contacts between groups. Motorized use within the area is not permitted.
Semi-Primitive Non-Motorized	Some opportunity for isolation from the sights and sounds of man, but not as important as for primitive opportunities. Opportunity to have high degree of interaction with the natural environment, to have moderate challenge and risk, and to use outdoor skills.	Area is characterized by a predominantly unmodified natural environment of moderate to large size (2,500 acres). Concentration of users is low, but there is often evidence of other area users. On-site controls and restrictions may be present, but are subtle. Facilities are provided for the protection of resource values and the safety of users only. Spacing of groups may be formalized to disperse use and limit contacts between groups. Motorized use is not permitted.
Semi-Primitive Motorized	Some opportunity for isolation from the sights and sounds of man, but not a important as for primitive opportunities. Opportunity to have high degree of interaction with the natural environment, to have moderate challenge and risk, and to use outdoor skills. Explicit opportunity to use motorized equipment while in the area.	Area is characterized by a predominantly unmodified natural environment of moderate to large size (2,500 acres). Concentration of users is low, but there is often evidence of other area users. On-site controls and restrictions may be present, but are subtle. Facilities are provided for the protection of resource values and safety of users only. Spacing of groups may be formalized to disperse use and limit contacts between groups. Motorized use is permitted.
Roaded Natural	About equal opportunities for affiliation with other user groups and for isolation from sights and sounds of man. Opportunity to have a high degree of interaction with the natural environment. Challenge and risk opportunities are not very important except in specific challenging activities. Practice of outdoor skills may be important. Opportunities for both motorized and nonmotorized recreation are present.	Area is characterized by a generally natural environment with moderate evidence of the sights and sounds of man. Resource modification and utilization practices are evident, but harmonize with the natural environment. Concentration of users is low to moderate with facilities sometimes provided for group activity. On-site controls and restrictions offer a sense of security. Rustic facilities are provided for user convenience as well as for safety and resource protection. Conventional motorized use is provided for in construction standards and design of facilities.

Continued on next page

APPENDIX 12 (Continued)

THE RECREATION OPPORTUNITY SPECTRUM CLASS DESCRIPTIONS

OPPORTUNITY CLASS	EXPERIENCE OPPORTUNITY	SETTING OPPORTUNITY
Rural	Opportunities to experience affiliation with individuals and groups are prevalent as is the convenience of sites and opportunities. these factors are generally more important than the natural setting. Opportunities for wildland challenges, risk taking, and testing of outdoor skills are unimportant, except in those activities involving challenge and risk.	Area is characterized by substantially modified natural environment. Resource modification and utilization practices are obvious. Sights and sounds of man are readily evident, and the concentration of users is often moderate to high. A considerable number of facilities are designed for use by a large number of people. Facilities are often provided for specific activities. Developed sites, roads, and trails are designed for moderate to high use. Moderate densities are provided far away from developed sites. Facilities for intensive motorized use are available.

APPENDIX 13

CULTURAL RESOURCE MANAGEMENT GUIDELINES

Manage for Information Potential

Cultural resources included under this management objective are capable of contributing useful scientific, historic, or management information. This information potential is to be protected to the extent needed, by physical or administrative means until the potential has been realized through appropriate study. The following resource types, and/or areas, will be managed for information potential: prehistoric lithic scatters, prehistoric ceramic scatters, historic archeological sites without architectural features, sites in upland pinyon-juniper forests and sites in riparian areas.

Resources to be managed for information potential can be studied, utilized, or included in data recovery projects to mitigate adverse effects after compliance with the BLM 8100 Manual Series and section 106 of the National Historic Preservation Act.

Manage for Public Values

Cultural resources included under this objective possess identified sociocultural, educational, recreational, or other public values. Their locations are to be managed in a manner that gives adequate consideration to these values. Resources managed for public values will have those values realized through activity plans. The following resource types and/or areas will be managed for public values: rock art alignments (geoglyphs) will be managed to preserve their sociocultural values for Native Americans, historic town sites, mining or milling sites, ranching or agricultural sites, or other historic sites with architectural features will be managed for educational and recreational values. Cultural resources can be released from public value after a representative sample has been preserved.

Manage for Conservation

Cultural resources to be conserved are those with overriding scientific or historic importance. They are managed to maintain them in their present condition and to protect them from potentially conflicting land or resource uses. Resources managed for conservation will have those values realized through resource and/or area specific activity plans.

For conservation and protection of cultural resources, activity plans may provide for fencing, monitoring, purchase of claims, stabilization, establishment of parks with full time rangers, limited data recovery/collection, public education/interpretation, or other protective measures. In addition, it is important that representative samples of all classes of sites in the resource area be preserved for the enjoyment and scientific benefit of future generations. Cultural resources can be released from conservation after a representative sample has been preserved.

Activity Plans

Cultural resources in the resource area will be allocated to specific uses in subsequent activity plans. Activity plans containing detailed management prescriptions for selected cultural properties will be developed after use allocations have been made.

APPENDIX 13 (Continued)

CULTURAL RESOURCE MANAGEMENT GUIDELINES

Cultural resource activity plans will be developed for the following areas: Trap Springs-Gravel Bar Complex, Stormy-Abel Complex, Cane Man Hill Petroglyphs, Tybo and McIntyre Charcoal Kilns, Moores Station Petroglyphs, Jumbled Rock Petroglyph, Tonopah Lake Complex, Mud Lake Complex, Big Springs Petroglyphs, Fish Lake Valley Petroglyphs, Mountain View Arrastra, Columbus Salt Marsh, Witched Well, Oriental Wash Petroglyphs, Cave Spring and The Cistern.

A rock art management plan will be developed for the Resource Area in consultation with Native American Leaders.

Monitoring

Archaeological Resource Protection Act (ARPA) surveillance points will be established in the following areas: Silver Peak Range, Clayton Valley, Fish Lake Valley, Hot Creek Range, Railroad Valley, all valleys with late Pleistocene lake features.

ARPA law enforcement and monitoring plans will be written for the following areas: Rhyolite, Trap Springs, Gravel Bar, and Stormy-Abel prehistoric districts, Fish Lake Valley Petroglyphs, Cave Spring, Cane Man Hill, Big Springs Petroglyphs and Fish Lake Valley Salt Marsh.

APPENDIX 14

RELATIONSHIP WITH THE ESMERALDA COUNTY POLICY FOR PUBLIC LANDS

This Appendix compares the actions of the Proposed Tonopah RMP with the provisions of the Esmeralda County Policy for Public Lands. The County policy is shown in the left-hand column and the corresponding actions of the Tonopah RMP are shown in the right-hand column. Each column is continued on following page.

ESMERALDA COUNTY POLICY FOR PUBLIC LANDS (April, 1985)

FEDERAL LANDS Manage and utilize public lands on the basis of multiple use and sustained yield concepts, and in a manner that will conserve natural resources; protect and preserve the quality of the of the environment, and ecological, scenic, historical and archeological values; protect and preserve wildlife habitat, and certain lands in their natural condition; and provide for long term benefit, including economic benefits, for the people of Esmeralda County and future generations.

POLICIES

1. Increase opportunities for local economic development by selectively increasing the amount of privately owned and locally managed land within the county. a) Lands with high recreational, wildlife, mineral and other public values should continue to remain as public lands. b) Public lands within the municipal service area of existing communities should continue to be made available for housing and industrial sites. These lands should be transferred only when local governments agree that the transfer is opportune and would not be a burden to local governments. Growth should be directed to these areas to the extent that it can be accommodated in a manner compatible with each area's character and without burdening public facilities and services. c) Residential and commercial development should be concentrated in the existing communities of Goldfield and Silver Peak, where public facilities can most economically concentrated. Disposals should also be permitted at Coaldale Junction, Gold Point, and just west of Tonopah. d) Public lands should continue to be made available for state and local government purposes. Land identified for

TONOPAH RMP

Disposal of Public Lands

1. The proposed RMP provides for community expansion and for private economic development through disposal of 299,140 acres of public lands. This includes lands near Goldfield, Silver Peak, Coaldale Junction, Gold Point and west of Tonopah. Land tenure adjustments are discretionary. No lands will be disposed of unless they are identified in this RMP. In order for public land to be sold, it must meet one of the following criteria set forth in Section 203(a) of the Federal Land Policy and Management Act of 1976:--the land is difficult or uneconomic to manage as a part of the public lands; and it is not suitable for management by another Federal department or agency.--the land was acquired for a specific purpose: and it is no longer required for that, or any other, Federal purpose; or--disposal of the land will serve important public objectives that can be achieved prudently or feasibly only if the land is removed from public ownership; and these objectives outweigh other public objectives or values that will be served by maintaining the land in Federal ownership. Site-specific decisions regarding land ownership adjustments within the resource area are to be

public purposes should receive preference over disposal for private purposes. e) Public land disposal should be in conformance with local land use plans. The general public and state and local governments should be involved in public land disposals.

made based on whether the lands are needed for Bureau programs, or whether or not they are considered more valuable for other purposes.

Public lands identified for disposal may be made available for sale, exchange, agricultural entry, lease, or patent for recreation or public purposes. Some lands identified for disposal may be retained in Federal ownership as a result of site specific application of the land ownership adjustment criteria.

2. Public land should be disposed of for private agricultural needs. a) Those lands disposed of for farm land would have to have adequate water, for irrigation and appropriate soil, as determined by a soil study. b) Before public lands are disposed of adverse impacts on existing and future uses should be considered. Adverse impacts could include important wildlife habitat, key seasonal grazing rights, municipal watershed, flood prone areas, access, mining (including potential), and recreational use of these lands.

2. There are three authorities for the disposal of public land specifically for agricultural purposes: the Desert Land Act, the Carey Act, and the General Allotment Act. Disposal of public land for agricultural purposes must meet the requirements of one of the three acts listed above and have a supporting permanent water source permitted by the Nevada State Engineer.

3. Whenever the public lands are disposed of, existing access to adjoining and nearby public lands should be retained for recreational or other multiple use needs or alternative routes of access should be made available.

3. All proposed developments will be reviewed for environmental impacts and effects on other land uses.

4. Promote the increased use of, and adherence to, comprehensive planning among all government entities in Nevada. a) The state and local governments should continue to develop land use plans to identify lands that should remain in public ownership. b) Local involvement and the use of Coordinated Resource Management Planning (CRMP) techniques should be encouraged in the federal planning process. c) Adequate public notice shall be given for all public hearings and meetings regarding Federal, state, and local planning and land management matters in Esmeralda County. In addition to required legal notices, it is recommended that information news articles be published along with posted notices at the Courthouse, post offices, and libraries in the County.

4. The BLM adheres to comprehensive land use plans which have been approved by local government, to the extent they are compatible with Federal law and policies, and to the extent that it is practical to do so. Proper notification of the public's opportunity to comment on federal planning efforts is mandated by law.

ESMERALDA COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
5. Corridors for communications, utilities and transportation need to be planned for in harmony with other multiple uses on the public lands.	5. Designated right-of-way corridors within the resource area will be three miles wide except where topographic constraints exist. Grants for rights-of-way are still required for facilities placed within designated corridors. Designation of a corridor does not mean that future rights-of-way are restricted to corridors, nor does it mean that there is a commitment by the BLM to approve all right-of-way applications within corridors.
6. To provide maximum management flexibility, disposals should be by the most appropriate authority available. a) Land exchanges that block up high value public purpose lands and make private lands more manageable should be given a high priority in federal real estate actions.	6. BLM land tenure adjustments will be done in accordance with the most appropriate Federal laws and policies. Exchanges are the preferred method of acquisition when other methods such as conservation easements or management agreements will not protect special value areas or resources. Exchanges must be in the public interest. Blocking up of public and private lands in a mixed land ownership situation will normally be in the public interest.
<u>AGRICULTURE</u> Recognize that agricultural production in Nevada will be necessary to help meet the requirements of future state populations and is important to Esmeralda County. Preserve agricultural lands and promote continuation of agricultural pursuits in Nevada.	<u>AGRICULTURE</u>
POLICIES	
1. Formally recognize the value of and necessity for the retention and expansion of agricultural land by all levels of government.	1. In order to provide for community expansion and private economic development, the Proposed RMP/EIS identifies 299,140 acres for disposal. Site specific decisions regarding land tenure adjustments will be determined using criteria outlined in the Standard Operating Procedures under "Lands". The only lands available for agricultural entry are those lands identified for disposal in the RMP.
2. The Federal government should continue to make the public rangelands economically and realistically available for livestock grazing, where compatible with other multiple use objectives.	2. Livestock grazing will continue to be authorized in accordance with the principles of multiple use and sustained yield and 43 CFR 4100. Increases or decreases in livestock grazing will be based on vegetation monitoring and periodic allotment evaluations.
3. Through State, Federal or other research institutions, promote a project to study the	3. This policy is not within the scope of an RMP/EIS and, therefore, has not been

feasibility of harnessing the brackish water and playa areas of the county as shrimp (prawn) farms.	considered.
4. Existing grazing permits should be continued and additional permits should be issued where appropriate to provide increased employment and revenue	4. See number 2 above.
MINERAL RESOURCES Recognize that the development of Nevada's mineral resources is desirable and necessary to the nation, the state and Esmeralda County. Retain existing mining areas and promote the expansion of mining operations and areas.	MINERAL RESOURCES
POLICIES	
1. There should be access to land where the mineral estate is in Federal ownership.	1. BLM provides for mineral entry, exploration, location, and operations pursuant to the mining laws in a manner that, 1) will not unduly hinder the mineral activities, and 2) assures that these activities are conducted in a manner which will prevent undue or unnecessary degradation of the public land.
2. The entire county should be kept open for prospecting, mining and related activities.	2. Presently 99.4 percent of the resource area is open to mineral entry. In the Proposed RMP, 98.8 percent of the Resource Area would be open to mineral entry.
3. The Federal Mining Law of 1872 should remain in effect as the basic law relating to mining activities.	3. The Proposed RMP/EIS is in compliance with applicable Federal laws and policies and does not analyze their merits. If the mining law is changed, the changes will be incorporated into the RMP through routine maintenance.
WILDERNESS The Esmeralda County Commissioners have adopted a resolution "deeming all areas of Esmeralda County to be inappropriate and unsuitable for wilderness designation by the Bureau of Land Management."	WILDERNESS
POLICIES	
1. The resolution adopted on May 15, 1984, regarding all lands of Esmeralda County deemed inappropriate and unsuitable for wilderness designation by the Bureau of Land	1 & 2. The Proposed RMP/EIS does not change any recommendations the BLM has sent to the Secretary of the Interior on wilderness. Management of Wilderness Study

ESMERALDA COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
Management is still supported.	Areas (WSAs) will continue under the "Interim Management Policy for Lands Under Wilderness Review". Those areas designated by Congress as Wilderness will be managed in accordance with the Wilderness Act and the specific enabling legislation requirements. A Wilderness Management Plan detailing management objectives and actions for all resources will be prepared for each area after designation.
2. The economic values that may be derived from retention of the Bureau of Land Management lands in multiple use outweigh the values of wilderness designation in Esmeralda County.	
3. Wilderness study areas should be returned to multiple use as soon as possible.	3. As stated in the Proposed RMP/EIS, should all or part of any WSA be released by Congress from wilderness study, resource management would be returned to multiple use management and would come under the scope of this RMP/EIS.
RECREATION Conserve and protect scenic, historical and recreation resources where not in conflict with economic resource development.	RECREATION
POLICIES	
1. Dispersed recreation opportunities on public lands should be encouraged. Opportunities for unstructured recreation such as camping, fishing, hunting and four-wheeling in Esmeralda County on public lands should continue to be made available.	1. A broad range of outdoor recreation opportunities will continue to be provided on all segments of the public land, subject to the demand for such opportunities and the need to protect other resources. Special Recreation Management Areas, areas of concentrated use and existing facilities will receive first priority for operation and maintenance funds.
2. Recreational use of off-highway vehicles should be substantially restricted to existing roads and trails in Fish Lake Valley.	2. All other BLM lands that are not limited in the RMP are open to all individual, commercial and competitive outdoor recreation uses. Most of the Silver Peak Range which borders Fish Lake Valley on the east side is limited to existing roads and trails.
WILD HORSES AND BURROS Manage wild horses and burros to minimize detrimental impacts on other multiple uses and pursue resource enhancement where needed to correct wild horse and burro damage.	WILD HORSES AND BURROS
POLICIES	
1. Wild horse and burro herds should be managed at reasonable levels to be determined with public involvement and managed with consideration on needs of other wildlife species and livestock grazing.	1. The Wild Free-Roaming Horse and Burro Act of 1971 requires the BLM to provide for the protection, management, and control of all wild horses and burros on lands administered by the BLM. Management is to be accomplished in a

	manner designed to achieve a thriving natural ecological balance and multiple-use relationship with other resource users. The initial herd size for each HMA was defined in previous land use plans, which were developed with public participation. Appropriate management levels will be established through the monitoring and evaluation process.
2. The Coordinated Resource Management and Planning (CRMP) process and/or Heil funds should be used to solve wild horse and burro problems.	2. The CRMP process is not specifically identified for use in this Proposed RMP/EIS. However, it is one of the activity planning tools which may be utilized to resolve wild horse and burro problems. Funds may be requested from the Nevada Commission for the Preservation of Wild Horses to assist in implementing the RMP.
3. Wild horse and burro impacts on private lands and waters should be mitigated.	3. Consistent with the Wild Free-Roaming Horse and Burro Act, the BLM is required to remove wild horses and burros from private land at the request of the land owner.
4. Any withdrawal of lands for wild horse or burro preserves is opposed.	4. No withdrawals are proposed for wild horse or burro preserves.
5. In those areas where there is a conflict between cattle and wild horses and burros, a reasonable harvest of wild horses and burros should be permitted. A similar harvest of wild horses and burros is recommended where there is a conflict with deer and bighorn sheep.	5. The management prescribed in the Proposed RMP/EIS for wild horses and burros is to be accomplished in a manner designed to achieve a thriving natural ecological balance and multiple use relationship with other resource users in accordance with the Wild Free-Roaming Wild horse and Burro Act. Wild horses and burros will be removed when the balance is exceeded.
6. Authority for wild horse and burro management should be returned to local governments.	6 & 7. These policy statements are beyond the scope of this Proposed RMP/EIS.
7. Laws and regulations on wild horses should be amended to allow greater flexibility for the disposal and adoption of wild horses and burros.	
<u>WILDLIFE</u> Identify, protect and preserve wildlife species and habitats in Esmeralda County.	<u>WILDLIFE</u>
POLICIES	
1. Identify habitat needs of wildlife species	1. Fish and wildlife habitat will be maintained

ESMERALDA COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
and provide for those needs so as to, in time, attain reasonable population levels compatible with other multiple uses as determined by public involvement. a) Known critical wildlife habitats, such as streams, riparian zones, and wetlands, should receive special management. b) Wildlife habitat improvement projects such as guzzlers should be continued as appropriate. The projects should take into consideration impacts on other uses.	or improved. These habitats will continue to be evaluated on a case-by-case basis as part of project-level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of fish and wildlife habitat in the affected area. Habitat Management plans will be prepared as funds are available. Habitat improvement projects will be implemented where necessary to stabilize or improve unsatisfactory or declining wildlife habitat condition. Sufficient forage and cover will be provided for wildlife. Range improvements will be designed to achieve both wildlife and range objectives. Important wildlife habitat such as streams and wetlands will be retained in Federal ownership.
2. Public wetlands should be retained and restored for wildlife values, except where they adversely affect geothermal drilling.	2. In general, wetlands will not be disposed of in the Proposed RMP/EIS. Efforts will be made in riparian areas around streams, springs and seeps to restore them for wildlife values. Riparian areas will be managed to achieve Proper Functioning condition as defined in this Proposed RMP/EIS. The impacts of geothermal drilling will be examined on a case-by-case basis for effects on riparian habitat. Mitigation of potential adverse impacts will be incorporated as determined necessary.
3. Adequate and sufficient habitat to support the reintroduction of bighorn sheep and elk in Esmeralda County should be provided on the public lands. These mountain ranges have been identified for the reintroduction of bighorn sheep: Lone Peak, Monte Cristo Mountains, and Silver Peak. The reintroduction should only be made where they do not interfere or jeopardize other multiple uses of the land especially mining.	3. The reintroduction or augmentation of bighorn sheep into potential habitat areas of Goldfield, Magruder/Palmetto, Monte Cristo, Montezuma, Silver Peak and Gold Mountain habitat areas will continue to be supported in the Proposed RMP/EIS. No elk introductions are proposed. All reintroduction proposals will be examined to determine impacts on other land uses.

APPENDIX 15

RELATIONSHIP WITH THE NYE COUNTY POLICY FOR PUBLIC LANDS

This Appendix compares the actions of the Proposed Tonopah RMP with the provisions of the Nye County Policy for Public Lands. The County policy is shown in the left-hand column and the corresponding actions of the Tonopah RMP are shown in the right-hand column. Each column is continued on following page.

NYE COUNTY POLICY FOR PUBLIC LANDS (April, 1985)	TONOPAH RMP
FEDERAL LANDS Manage and utilize public lands on the basis of multiple use and sustained yield concepts, and in a manner that will conserve natural resources; protect and preserve the quality of the of the environment, and ecological, scenic, historical and archeological values; protect and preserve wildlife habitat, and certain lands in their natural condition; and provide for long term benefit, including economic benefits, for the people of Nye County and future generations.	
POLICIES	
1. Increase opportunities for local economic development by selectively increasing the amount of privately owned and locally managed land within the county. a) Lands with high recreational, wildlife, mineral and other public values should continue to remain as public lands. b) Public lands within the municipal service area of existing communities should continue to be made available to the private sector for housing and economic activity. These lands should be transferred only when local governments agree that the transfer is opportune and would not be a burden to local governments. Growth should be directed to these areas to the extent that it can be accommodated in a manner compatible with each area's character and without burdening public facilities and services. c) Public lands should continue to be made available for state and local government purposes. Land identified for public purposes should receive preference over disposal for private purposes. d) Public land disposal should be in conformance with local land use plans. The general public and state and local governments should be involved in public land disposals. e) Public lands should be made available to local governments at a discounted price and then those local	1. The Proposed RMP provides for community expansion and for private economic development through disposal of 299,140 acres of public lands. Land tenure adjustments are discretionary. No lands will be disposed of unless they are identified in this RMP. In order for public land to be sold, it must meet one of the following criteria set forth in Section 203(a) of the Federal Land Policy and Management Act of 1976:--the land is difficult or uneconomic to manage as a part of the public lands; and it is not suitable for management by another Federal department or agency.--the land was acquired for a specific purpose: and it is no longer required for that, or any other, Federal purpose; or--disposal of the land will serve important public objectives that can be achieved prudently or feasibly only if the land is removed from public ownership; and these objectives outweigh other public objectives or values that will be served by maintaining the land in Federal ownership. Site-specific decisions regarding land ownership adjustments within the resource area are to be made based on whether the lands are needed for Bureau programs, or whether or not they are considered more valuable for other purposes.

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
governments should be allowed to develop and dispose of the lands to private interests.	Public lands identified for disposal may be made available for sale, exchange, agricultural entry, lease, or patent for recreation or public purposes. Some lands identified for disposal may be retained in Federal ownership as a result of site specific application of the land ownership adjustment criteria.
2. Public land should be disposed of for private agricultural needs. a) Those lands disposed of for farm land would have to have adequate water, for irrigation and appropriate soil, as determined by a soil study. b) Before public lands are disposed of adverse impacts on existing and future uses should be considered. Adverse impacts on existing and future uses should be considered. Adverse impacts could include important wildlife habitat, key seasonal grazing rights, municipal watershed, flood prone areas, access, mining (including potential), and recreational use of these lands.	2. There are three authorities for the disposal of public land specifically for agricultural purposes: the Desert Land Act, the Carey Act, and the General Allotment Act. Disposal of public land for agricultural purposes must meet the requirements of one of the three acts listed above and have a supporting permanent water source permitted by the Nevada State Engineer.
3. Whenever the public lands are disposed of, existing access to adjoining and nearby public lands should be retained for recreational or other multiple use needs or alternative routes of access should be made available. a) When access to public lands with high recreational or other public values is blocked by private lands, public access should be developed.	3. All proposed developments will be reviewed for environmental impacts and effects on other land uses.
4. Promote the increased use of, and adherence to, comprehensive planning among all government entities in Nevada. a) The state and local governments should continue to develop land use plans to identify lands that should remain in public ownership. b) Local involvement and the use of Coordinated Resource Management Planning (CRMP) techniques should be encouraged in the federal planning process. c) Adequate means should be developed to implement the policies in this plan.	4. The BLM adheres to comprehensive land use plans which have been approved by local government, to the extent they are compatible with Federal law and policies, and to the extent that it is practical to do so. Proper notification of the publics opportunity to comment on federal planning efforts is mandated by law. The CRMP process is not specifically identified for use in this Proposed RMP/EIS. However, its is one of the activity level planning tools which may be utilized to resolve land use issues.
5. Corridors for communications and transportation need to be planned for in harmony with other multiple uses on the public lands.	5. Designated right-of-way corridors within the Resource Area will be three miles wide except where topographic constraints exist. Grants for rights-of-way are still required for facilities placed within designated corridors. Designation of a corridor does not mean that future rights-of-way are restricted to corridors, nor does it mean that there is a commitment by

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
	the BLM to approve all right-of-way applications within corridors.
6. To provide maximum management flexibility, disposals should be by the most appropriate authority available. a) Land exchanges that block up high value public purpose lands and make private lands more manageable should be given a high priority in federal real estate actions.	6. BLM land tenure adjustments will be done in accordance with the most appropriate Federal laws and policies. Exchanges are the preferred method of acquisition when other methods such as conservation easements or management agreements will not protect special value areas or resources. Exchanges must be in the public interest. Blocking up of public and private lands in a mixed land ownership situation will normally be in the public interest.
7. Federal land management agencies should expand efforts to clarify the legal status and title to historically disposed lands. This action should receive priority over other land action issues.	7. The determination of legal status and title to lands which have been placed in private ownership is on-going and no action is required at the RMP/EIS level.
NUCLEAR AND HAZARDOUS WASTE STORAGE The storage of nuclear and hazardous waste in Nevada should not occur unless it can be proven that said storage will not adversely impact the health, safety and well-being of Nevadans (current and future residents) and Nevada's unique and valued environment. It is incumbent on entity (public or private) desiring to store nuclear and/or hazardous waste in Nevada to utilize the best and most relevant scientific methods and information in ascertaining the impact of said storage on man and his environment. All activity associated with said storage (including but not limited to analyses, planning, construction, operation and closure activities) must involve the state and its affected local governments as full partners or participants.	NUCLEAR AND HAZARDOUS WASTE STORAGE No proposals to store nuclear or hazardous wastes are considered in the Proposed RMP/EIS.
AGRICULTURE Recognize that agricultural production in Nevada will be necessary to help meet the requirements of future national populations and is important to Nye County. Preserve agricultural lands and promote continuation of agricultural pursuits in Nevada.	AGRICULTURE
POLICIES	
1. Formally recognize the value of and necessity for the retention and expansion of	1. In order to provide for community expansion and private economic development, the

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
agricultural land by all levels of government.	Proposed RMP/EIS identifies 299,140 acres for disposal. Site specific decisions regarding land tenure adjustments will be determined using criteria outlined in the Standard Operating Procedures under "Lands". The only lands available for agricultural entry are those lands identified for disposal in the RMP. Disposal of public land for agricultural purposes must have a supporting permanent water source permitted by the Nevada State Engineer.
2. The Federal government should continue to make the public rangelands economically and realistically available for livestock grazing, where compatible with other multiple use objectives.	2. Livestock grazing will continue to be authorized in accordance with the principles of multiple use and sustained yield and 43 CFR 4100. Increases or decreases in livestock grazing will be based on vegetation monitoring and periodic allotment evaluations.
3. Public lands should be made available for private agricultural needs. a) Desert Land Entries should provide adequate planning and guarantees to minimize adverse impacts and economic cost to the existing community	3. See number 1 above.
4. Water supplies and sources for irrigation should be protected. Federal ownership of water rights is opposed.	4. The administration of water within the State of Nevada is the responsibility of the State Engineer who is charged with the protection of water supplies and sources. This Proposed RMP/EIS proposes the acquisition of water to support multiple uses on public lands. This is accomplished by applying for available water rights according to Nevada water law, or by assertion of a public water reserve.
MINERAL RESOURCES Recognize that the development of Nevada's mineral resources is desirable and necessary to the nation, the state and Nye County. Retain existing mining areas and promote the exploration and development of potential mineral deposits.	MINERAL RESOURCES
POLICIES	
1. There should be full and reasonable access to land where the mineral estate is in federal ownership except lands withdrawn for recreation, townsites, historic, wilderness and wildlife purposes.	1. BLM provides for mineral entry, exploration, location, and operations pursuant to the mining laws in a manner that, 1) will not unduly hinder the mineral activities, and 2) assures that these activities are conducted in a manner which will prevent undue or unnecessary degradation of the public land.

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
2. Mineral development of public domain lands should be encouraged and supported, consistent with multiple use guidelines.	2. Presently 99.4 percent of the resource area is open to mineral entry. In the Proposed RMP, 98.8 percent of the resource area would be open to mineral entry.
3. The Federal Mining Law of 1872 should remain in effect as the basic law relating to mining activities.	3. The Proposed RMP/EIS is in compliance with applicable Federal laws and policies and does not analyze their merits. If the mining law is changed, the changes will be incorporated into the RMP through routine maintenance.
ENERGY RESOURCES Provide for Nevada's energy needs through coordinated resource planning and management between private enterprise and government to plan for development of energy resources.	ENERGY RESOURCES
POLICIES	
1. Federal land management agencies should develop an inventory of possible sites for geothermal power facilities.	1. Existing data was used in the Proposed RMP/EIS to identify areas with potential for geothermal resources.
2. Oil and gas resources should be inventoried and development encouraged. Public lands with a high potential for oil and gas resources should not be withdrawn from exploration.	2. Existing data was used in the Proposed RMP/EIS to identify areas with potential for oil and gas development. The Proposed RMP allows fluid mineral leasing on 88.6 percent of the Tonopah Resource Area.
3. Corridors for future transmission of energy need to be planned for in harmony with other multiple uses on public lands.	3. Designated right-of-way corridors within the Resource Area will be three miles wide except where topographic constraints exist. Grants for rights-of-way are still required for facilities placed within designated corridors. Designation of a corridor does not mean that future rights-of-way are restricted to corridors, nor does it mean that there is a commitment by the BLM to approve all right-of-way applications within corridors.
RECREATION Conserve and protect scenic, historical and recreation resources.	RECREATION
POLICIES	
1. Dispersed recreation opportunities on public lands should be encouraged. Opportunities for unstructured recreation such as camping, fishing, hunting and four-wheeling in Nye County on public lands should continue to be made available.	1. A broad range of outdoor recreation opportunities will continue to be provided on all segments of the public land, subject to the demand for such opportunities and the need to protect other resources. Special Recreation Management Areas, areas of concentrated use and existing facilities will receive first priority

for operation and maintenance funds.

2. Public land with value for concentrated recreational use (camp grounds, Historic sites, water recreational sites, etc.) should be identified, protected and developed for recreational purposes and adequately maintained. The county and the Division of State Parks, should be involved in recreational site designation and planning. Public lands should be acquired for park sites.

2. The Proposed RMP/EIS identifies 64,895 acres for designation as Special Recreation Management Areas where the presence of high quality natural resources and current or potential demand warrants intensive use practices. All BLM lands that are not limited in the RMP are open to all individual, commercial and competitive outdoor recreation uses. Opportunities for exploring the back-country by vehicle, hunting, camping, sightseeing, and hiking are encouraged.

WILDERNESS Wilderness designation or recommendation should only be made where the values of wilderness designation are capable of balancing the other resource values and uses which would be foregone due to wilderness designation.

WILDERNESS

POLICY

1. Wildlife, fire control, mineral resources, visitor impacts, grazing and management needs should be considered when designating areas for wilderness. Documented mineral resources or geologic provinces are adequate reasons for not considering the area as wilderness. Any adverse economic impacts of wilderness designation on local governments should be identified and minimized.

1. The Proposed RMP/EIS does not change any recommendations the BLM has sent to the Secretary of Interior on wilderness. Management of Wilderness Study Areas (WSAs) will continue under the "Interim Management Policy for Lands Under Wilderness Review". The RMP will conform to the enabling legislation that is passed by Congress.

2. Wilderness area management plans should be developed involving the public and governmental consultation, preferably using a coordinated resource management planning (CRMP) process.

2. Those areas designated by Congress as Wilderness will be managed in accordance with the Wilderness Act and the specific enabling legislation requirements.

3. Only areas that could be managed as wilderness should be considered for wilderness designation; boundaries should be easily identifiable on the ground and should not cut off needed access ways.

3. A Wilderness Management Plan detailing management objectives and actions for all resources will be prepared for each area after designation. Local government and affected interests may participate in the management planning.

4. Wilderness study areas which will not be further considered for wilderness should be returned to multiple use as soon as possible.

4. As stated in the Proposed RMP, should all or part of any WSA be released by Congress from wilderness study, resource management would be returned to multiple use management and would come under the scope of this Proposed RMP/EIS.

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
5. If any areas are designated as wilderness, the enabling legislation should include language which will eliminate any consideration or application of "buffer" area concepts. Enabling legislation should also specifically allow continued grazing.	5. The RMP will conform to the enabling legislation that is passed by Congress.
CULTURAL RESOURCES Conserve and protect the buildings, historic districts, objects, sites, trails and structures of historical and prehistorical significance for the benefit of the present and future generations.	CULTURAL RESOURCES
POLICIES	
1. Continue to expand the federal efforts in identifying, preserving and interpreting Nevada's history.	1. The BLM is required to identify, evaluate, and protect cultural resources on public lands under its administration and to ensure consideration of cultural resources prior to initiation of proposed BLM authorized activities. If an area will be in any way affected by those activities, a cultural resources inventory will be conducted.
2. Cultural resources and historic sites should be protected to the fullest extent possible as set forth under the National Historic Preservation Act of 1966.	2. In accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and the Programmatic Agreement among the Nevada BLM, the Nevada Division of Historic Preservation and Archaeology, and the Advisory Council on Historic Preservation, National Register eligibility determinations are made in consultation with the Nevada Division of Historic Preservation and Archaeology. A determination of effects to those eligible properties from the proposed project is also made in consultation with the Nevada State Historic Preservation Office.
WILD HORSES AND BURROS Manage wild horses and burros to minimize detrimental impacts on other multiple uses and pursue resource enhancement where needed to correct wild horse and burro damage.	WILD HORSES AND BURROS
POLICIES	
1. Wild horse and burro herds should be managed at reasonable levels to be determined with public involvement and managed with consideration on needs of other wildlife species and livestock grazing. a) Wild horse and burro	1. The Wild and Free-Roaming Horse and Burro Act of December, 1971 requires the BLM to provide for the protection, management, and control of all wild horses and burros on lands administered by the BLM. Management is to

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
populations and herd use areas should be based on statistics gathered when the Wild Horse and Burro Act was passed (1971).	be accomplished in a manner designed to achieve a thriving natural ecological balance and multiple-use relationship with other resource users. The initial herd size for each HMA was defined in previous land use plans, which were developed with public participation. Appropriate management levels will be established through the monitoring and evaluation process.
2. The coordinated resource management and planning (CRMP) process and/or Heil funds should be used to solve wild horse and burro problems.	2. The CRMP process is not specifically identified for use in this Proposed RMP/EIS. However, its is one of the activity planning tools which may be utilized to resolve wild horse and burro problems. Funds may be requested from the Nevada Commission for the Preservation of Wild Horses to assist in implementing the RMP.
3. Wild horse and burro impacts on private lands should be mitigated.	3. Consistent with the Wild and Free Roaming Horse and Burro Act, the BLM is required to remove wild horses and burros from private land at the request of the land owner.
4. Fencing adjacent to federal highways should be provided by the federal government and/or state government in those open range areas where a number of roadway accidents have occurred resulting in personal injury or death. The priority for fencing should be adjacent to highway 95 north of Beatty and north of Tonopah.	4. Highway 95 has been fenced north of Beatty to Tonopah. Portions of U.S. Highway 6 have also been fenced. The Proposed RMP/EIS identifies additional fencing along U.S. Highway 6 and Highway 376. Highway fencing is generally accomplished as a cooperative effort between the State and Federal Highway agencies and the BLM.
<u>WILDLIFE</u> Identify, protect and preserve wildlife species and habitats in Nye County.	<u>WILDLIFE</u>
POLICIES	
1. Identify habitat needs of wildlife species and provide for those needs so as to, in time, attain reasonable population levels compatible with other multiple uses as determined by public involvement. a) Known critical wildlife habitats, such as streams, riparian zones, and wetlands, should receive special management. b) Wildlife habitat improvement projects such as guzzlers should be continued as appropriate. The projects should take into consideration impacts on other uses. c) Public wetlands should be retained and restored for wildlife values.	1. Fish and wildlife habitat will be maintained or improved. These habitats will continue to be evaluated on a case-by-case basis as part of project-level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of fish and wildlife habitat in the affected area. Habitat Management Plans will be prepared as funds are available. Habitat improvement projects will be implemented where necessary to stabilize or improve unsatisfactory or declining wildlife habitat condition. Sufficient forage and cover will be provided for wildlife. Range improvements will be designed to achieve both

NYE COUNTY POLICY FOR PUBLIC LANDS	TONOPAH RMP
	wildlife and range objectives. Important wildlife habitat such as streams and wetlands will be retained in Federal ownership.
2. Federal land management agencies should consult with local wildlife advocates and the Nye County Game Board in regard to public land planning related to wildlife.	2. The Proposed RMP/EIS has been mailed to the Nye County Game Board, the Nevada Division of Wildlife and other wildlife organizations for their comments.
3. Adequate and sufficient habitat to support the reintroduction of bighorn sheep and elk in Nye County should be provided on the public lands. Existing range uses should be taken into consideration. These mountain ranges have been identified for the reintroduction of bighorn sheep: Bare Mountain, Belted Range, Golden Gate Range, Grant Range, Hot Creek Range, Kawich Range, Monitor Range, Reveille Range, South Egan Range, and Spector Range.	3. The reintroduction or augmentation of bighorn sheep into potential habitat areas in the Hot Creek, Sawtooth, and Bare Mountain habitat areas will continue to be supported. The remaining areas are outside the Tonopah Resource Area. No elk introductions are proposed.
4. Threatened and endangered species protection should be in coordination with other land uses.	4. The Proposed RMP/EIS is consistent with the Endangered Species Act and BLM policy to carry out special status candidate species management consistent with multiple-use for conservation of candidate species and their habitats. It ensures that actions authorized or funded do not contribute to the need to list any species as threatened or endangered.

APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

I. DISPOSAL AREAS

GENERAL LOCATION	LEGAL DESCRIPTION
Fish Lake Valley[1]	T. 1 S., R. 35 E., public land within the following sections: 1-5, 8-17, 20-25, 28, 29, 32-36; T. 2 S., R. 35 E., public land within the following sections: 1-5, 8-17, 20, 21, 23-26, 28, 29, 32, 33, 35, 36; T. 3 S., R. 35 E., public land within the following sections: 1, 2, 4-9, 11-14, 16, 17, 21, 22, 24-27, 35, 36; sections 22, 26, 27, 35, 36 west and south of von Schmidt line (MDM, California) T. 3 S., R. 36 E., sec. 29, S½; sec. 31, Lots 3 & 4, E½SW¼, SE¼; sec. 32, N½NE¼, SE¼NE¼, W½W½, E½SE¼; T. 4 S. R. 36 E., public land within the following sections: 3-10, 14-17, 21-23, 25-27, 35, 36.
US 6/SR 264[1]	T. 2 N., R. 36 E., sec. 20, all.
Coaldale Junction[1]	T. 2 N., R. 37 E., sec. 7, Lots 1-4, E½W½, E½; sec. 8, all; sec. 17, N½N½, SE¼NE¼, SW¼NW¼, SW¼, NE¼SE¼, S½SE¼; sec.18, Lots 1-4, E½W½, E½.
US 6/US 95/SR 275[1]	T. 2 N., R. 38 E., sec. 20, all; T. 2 S., R. 39 E., public land within the following sections: 2-4, 9-11, 14-16, 21-23, 26-28, 33-36.
Millers Rest Stop[1]	T. 3 N., R. 40 E., sec. 1, Lots 1-4, S½N½, S½; sec. 2, Lots 1-4, S½NE¼, SE¼NW¼, E½SW¼, SE¼; sec. 3, Lots 1-4, SW¼NW¼, W½SW¼; sec. 10, W½W½; sec. 11, NE¼, NE¼NW¼,
Millers (con't)	E½SW¼, E½; sec. 12, all.
Lida[1]	T. 5 S., R. 40 E., sec. 25,26,35,36; T. 6 S., R. 40 E., sec. 2, 3.
Gold Point[1]	T. 6 S., R. 41 E. public land within the following sections: sec. 36, S½S½; T. 7 S., R. 41 E., public land within the following sections: sec. 1, 12; T. 7 S., R. 41½ E., public land within the following sections: sec. 3, 4, 9, 10.
Goldfield[1]	T. 2. S., R. 42 E., public land within the following sections: sec. 20-29, 32-36; T. 3 S., R. 42 E., public land within the following sections: 1-5, 8-17, 20-24; T. 2 S., R. 43 E., public land within the following sections: sec. 19, 20, 29-32; T. 3 S., R. 43 E., public land within the following sections: sec. 5-8, 17-20.
Magruder[2]	T. 6 S., R. 39 E., sec. 13, NW¼SE¼, NE¼SW¼;
Hwy 267[1]	T. 8 S., R. 43 E., sec. 22, 23 all.
Scotty's Junction[1]	T. 7 S., R. 44 E., sec. 21, 27-29, 32-34; T. 8 S., R. 44 E., sec. 2, 3.

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

I. DISPOSAL AREAS (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Beatty[1]	public land within (not otherwise reserved or designated): T. 10 S., R. 47 E., sec. 14-23, 26-35; T. 11 S., R. 47 E., sec. 2, W½; sec. 3, 49, 10, 16, 21, 28, 33; sec. 5, E½; sec. 8, E½; sec. 15, N½N½; sec. 17, E½; sec. 20, E½; sec. 29, E½; sec. 32, E½; T. 12 S., R. 47 E., sec. 4-9, 16-21, 28-33; T. 12 S., R. 46 E., sec. 1-3, 9-15, 22-27, 34-36; sec. 4, E½; sec. 8, E½; sec. 16, E½; sec. 21, E½; sec. 28, E½; sec. 33, E½.
San Antonio Ranch[1]	T. 7 N., R. 41 E., sec. 13, E½E½; sec. 24, E½E½; T. 7 N., R. 42 E., sec. 17, N½, SE¼; sec. 18, Lots 1-3, 5-10; E½NW¼, N½NE¼SW¼; sec. 19, Lots 2-6, 8-10; NE¼NE¼NE¼NW¼, S½NE¼NE¼NW¼,S½NE¼NW¼, SE¼NW¼,E½SW¼,SE¼; sec. 20, Lots 1-4; NE¼, S½.
Manhattan[1]	T. 8 N., R. 42 E., sec. 1, Lots 1-4, S½N½, S½; sec. 2, SE¼; sec. 9, E½NE¼, N½NW¼, SW¼NW¼, SW¼, NE¼SE¼; sec. 10, S½; sec. 11, Lots 1-8, E½;
Manhattan (con't)	sec. 12-15, all; sec. 16, SW¼NE¼, W½, W½SE¼; sec. 21, W½NE¼, W½, SE¼; sec. 22, 23, 24, all. T. 8 N., R 43 E., sec. 2, Lots 3 & 4, S½NW¼, SW¼; sec. 3, Lots 1-4, S½N½, S½; sec. 4, Lots 1-4, S½N½, S½; sec. 5, Lots 1-4, S½N½, S½; sec. 6, Lots 1-6, S½NE¼, SE¼NW¼, E½SW¼, SE¼; sec. 7, Lots 1-4, NE¼, E½NW¼, E½SW¼, SE¼; sec. 8, 9, 10, all sec. 11, Lots 5-8, NW¼; sec. 15, Lots 1-12, NW¼; sec. 16, 17, all; sec. 18, Lots 1-4, E½, E½W½; sec. 19, Lots 1-4, E½, E½W½; sec. 20, 21, all; sec. 22, lots 1-4, E½, E½W½; sec. 23, public land within; sec. 24, public land within; T. 8 N., R.44 E., sec. 18, Lots 1-4; sec. 19, Lots 1-4; sec. 20, public land within.
Ione/Berlin[1]	T. 13 N., R. 39 E., sec. 19,30-33; public land within: sec. 34; T. 12 N., R. 39 E., sec. 5-8, 17-19; sec. 20 N½, SW; sec. 30-32.
Tonopah[1]	public land within: T. 3 N., R. 44 E., sec. 3-10, 15,24, 27-34; T. 3 N., R. 43 E., sec. 1; sec. 2, E½; sec. 12; sec. 13, E½; sec. 19, 20;

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

I. DISPOSAL AREAS (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Tonopah (Con't)	sec. 21, E½; sec. 25-36; T. 3 N., R. 42 E., sec. 25-36; T. 2 N., R. 42 E., sec. 1-18; T. 2 N., R. 43 E., sec. 1-18; T. 2 N., R. 44 E., sec. 3-10; sec. 15-18.
Round Mountain/ Carvers/ Smoky Valley[1]	T. 10 N., R. 44 E., public land within: sec. 4-9, 16-20, 29, 30; sec. 21, W½. T. 11 N., R. 44 E., public land within: sec. 28, 29, 30. T. 9 N., R. 43 E., sec. 4-8; T. 10 N., R. 43 E., public land within; T. 11 N., R. 43 E., public land within: sec. 3-10, 15-22, 25-36; T. 12 N., R. 43 E., public land within: sec. 3-10, 15-22, 27-36; T. 13 N., R. 43 E., public land within: sec. 19-22, 27-34.
Monitor Valley[3]	T. 9 N., R. 46 E., sec. 2, 16, 17, 21, 22, 28, all;

GENERAL LOCATION	LEGAL DESCRIPTION
Monitor Valley (con't)	sec. 20, E½, W½W½; sec. 29, E½, W½W½.
Stone Cabin Ranch[1]	T. 4 N., R. 48 E., sec. 4-9, 16-18.
Warm Springs[1,3]	T. 4 N., R. 51 E., sec. 1, E½, E½NW, N½SW¼, SE¼SW¼; sec. 2, W½NE¼, E½NW¼, NW¼NW¼, N½SW¼, SE¼SW¼, E½SE¼, NE¼SE¼; sec. 11, 15-17, 20-22, 27-29, all; sec. 12, N½, E½SE¼; sec. 13, NE¼NE¼, SW¼, E½SE¼; T. 2 N., R. 45 E.,
S. Railroad Valley[1,3]	T. 6 N., R. 51 E., sec. 10-12, 13, 14, 23, 21 all; sec. 9, SW¼SW¼; public land within: sec. 15, 22; sec. 16, NW¼NW¼; T. 1 N., R. 53 E., sec. 11, 14-17, 20 all; sec. 8, S½; sec. 9, S½; sec. 10, S½; T. 2 N., R. 53 E., sec. 7-21 all; T. 3 N., R. 53 E., sec. 1, W½; sec. 3, S½; sec. 7, N½; sec. 8, N½; sec. 10, N½; sec. 12, N½; T. 4 N., R. 53 E., sec. 14, all; T. 5 N., R. 55 E., sec. 36, E½NE¼, NW¼SE¼; T. 4 N., R. 54 E., sec. 2, E½, SW¼; sec. 3, SE¼; sec. 7, S½S½; sec. 18, N½N½; sec. 16, all;

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LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

I. DISPOSAL AREAS (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
S. Railroad Valley (con't)	T. 5 N., R. 54 E., sec. 11, 12, 14, 23, 24, 25; sec. 13, N½.
Smoky Valley[1,3]	T. 12 N., R. 44 E., sec. 18, Lots 2, 3; sec. 18, SW¼NE¼, SE¼NW¼, NE¼SW¼, NW¼SE¼; sec. 19, Lots 1,2; sec. 19, W½NE¼, E½NW¼; sec. 30, Lots 14, 15, 18, 19; sec. 31, Lots 6, 7, 10, 11.
South Stone Cabin Valley[1,3]	T. 1 N., R. 46 E., sec. 15, 21, 22, 24, 26-28.
Nyala Ranch[1,3]	T. 4 N., R. 55 E., sec. 1, all; T. 5 N., R. 55 E., sec. 25, 36; T. 4 N., R. 56 E., sec. 5, 6 all; T. 5 N., R. 56 E., sec. 11-14, 19-23, 29, 30, 32 all; sec. 15, S½; sec. 16, S½; sec. 17, S½; sec. 24, N½S½, SW¼SW¼, SE¼SE¼; sec. 31, NE¼, SE¼NW¼, S½.

[1] FLPMA Sec. 203 (a)(3) Community expansion
[2] FLPMA Sec. 203 (a)(1) Isolated tracts
[3] FLPMA Sec. 203 (b) Agricultural in nature

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LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

II. ACQUISITION AREAS

GENERAL LOCATION	LEGAL DESCRIPTION
Amargosa-Oasis	T. 10 S., R. 47 E., sec. 32, N½SE¼, N½SE¼SE¼; sec. 33, SW¼SW¼; T. 11 S., R. 47 E., sec. 21, E½E½SE¼; sec. 28, SW¼NE¼SE¼, E½SE¼SE¼, NE¼SE¼SE¼; T. 12 S., R. 47 E., sec. 5, NW¼NE¼NE¼, NE¼NW¼NE¼, SE¼NW¼NE¼, W½SE¼SW¼, NE¼SE¼SW¼;
Rhyolite	T. 12 S., R. 46 E., sec. 9, portion of: W½W½NE¼SE¼, NW¼SE¼, W½SW¼SE¼, NE¼SW¼SE¼, W½W½SE¼SW¼SE¼, W½NW¼SE¼SE¼;
Lockes	T. 8 N., R. 55 E., sec. 14, NW¼NW¼, S½NW¼, N½SW¼; sec. 15, SW¼NE¼, SE¼NW¼, NE¼SW¼, SE¼;
Pritchards Station	T. 11 N., R. 52 E., sec. 19, E½NE¼, SW¼NE¼, SE¼NW¼;
Moores Station	T. 10 N., R. 51 E., sec. 25, SE¼SE¼; sec. 36, N½NW¼, SE¼NW¼;

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LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

III. AREAS OF CRITICAL ENVIRONMENTAL CONCERN

GENERAL LOCATION	LEGAL DESCRIPTION
Amargosa-Oasis	T. 10 S., R. 47 E., sec. 28, SW¼SE¼, N½N½SE¼SE¼; T. 11 S., R. 46 E., sec. 26, S½SW¼SE¼; T. 11 S., R. 47 E., sec. 9, SW¼NW¼, SW¼SW¼; sec. 18, NE¼NE¼; sec. 32, E½SE¼SE¼; T. 12 S., R. 47 E., sec. 5, NW¼NE¼, portion of SW¼NE¼, S½NW¼; sec. 17 public land in W½W½.
Lunar Crater	T. 6 N., R. 52 E., sec. 1, 12, 13; T. 6 N., R. 53 E., sec. 1-12, 14-18; sec. 20; T. 7 N., R. 52 E., sec. 13, 14, 23-26, 35, 36; sec. 27, E½, E½W½; sec. 34, E½, E½W½; T. 7 N., R. 53 E., sec. 2-4, 9-11, 13-36.
Cane Man Hill	T. 3 S., R. 38 E., sec. 1, S½SE¼; sec. 12, E½; T. 3 S., R. 39 E., sec. 6, S½; sec. 7, NW¼, NW¼SW¼.
Lone Mountain	T. 2 N., R. 40 E., sec. 3-5; sec. 6, E½, SW¼; sec. 7-10, 15-18, 19-22, 27-29; sec. 30, E½; sec. 34, all; T. 2 N., R. 39 E., sec. 1, SE¼; sec. 12, all; sec. 13, N½, SE¼; sec. 24, NE¼;
Lone Mountain (con't)	T. 2 N., R. 40 E., sec. 3-5; sec. 6, E½, SW¼; sec. 7-10, 15-18, 19-22, 27-29; sec. 30, E½; sec. 34, all; T. 2 N., R. 39 E., sec. 1, SE¼; sec. 12, all; sec. 13, N½, SE¼; sec. 24, NE¼.
Railroad Valley	T. 8 N., R. 55 E., sec. 10, S½S½SE¼; sec. 15, E½NE¼, NW¼NE¼, NE¼NW¼; sec. 12, E½, NE¼NW¼, S½W½; sec. 13, S½S½; sec. 23, N½; sec. 24, all; T. 8 N., R. 56 E., sec. 18, S½SW¼; sec. 19, W½; T. 9 N., R. 56 E., sec. 34, S½; sec. 35, S½; T. 8 N., R. 56 E., sec. 1, SW¼; sec. 2, 3, 10, 11, 14, 15; sec. 9, E½; sec. 12, NW¼; sec. 16, E½; T. 9 N., R. 57 E., sec. 33, S½; sec. 34, S½; T. 8 N., R. 57 E., Sec. 2, NW¼, N½SW¼, W½SW¼SW¼; sec. 3, 4, 9, 16; sec. 10, N½, SW¼; sec. 15, W½.

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

III. AREAS OF CRITICAL ENVIRONMENTAL CONCERN (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Tybo/McIntyre Charcoal Kilns	T. 6 N., R. 49 E., sec. 14, S½SW¼SW¼SW¼, SW¼SE¼SW¼SW¼; sec. 15, SE¼SE¼SE¼SE¼; sec. 22, E½NE¼NE¼NE¼; NE¼SE¼NE¼NE¼; sec. 23, NW¼NW¼NW¼, N½SW¼NW¼NW¼, W½NE¼NW¼NW¼, NW¼SE¼NW¼NW¼; T. 6 N., R. 49 E., sec. 17, S½NE¼NW¼, N½SE¼NW¼; T. 6 N, R. 49 E., sec. 20, S½NW¼NW¼, N½SW¼NW¼; T. 6 N., R. 49 E., sec. 29, E½NW¼SW¼, W½NE¼SW¼.
Rhyolite	T. 12 S., R. 46 E., sec. 9, SE¼; sec. 16, NE¼NE¼, N½SE¼NE¼, SW¼SE¼NE¼, NE¼SW¼SW¼, N½SE¼SW¼, N½S½SE¼; sec. 16, portion of E½NW¼NE¼, E½E½SW¼NE¼, SE¼SE¼NE¼, N½S½; sec. 21, SW¼SW¼NE¼NE¼, SE¼SE¼NW¼NE¼, E½NE¼SW¼NE¼, W½NW¼SE¼NE.

APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

IV. NEW WITHDRAWALS

GENERAL LOCATION	LEGAL DESCRIPTION
Rhyolite	T. 12 S., R. 46 E., sec. 16, NE¼NE¼; sec. 16, portion of E½NW¼NE¼; sec. 16, portion of E½E½SW¼NE¼; sec. 16, N½SE¼NE¼; sec. 16, SW¼SE¼NE¼; sec. 16,portion of SE¼SE¼NE¼; sec. 21, SW¼SW¼NE¼NE¼, SE¼SE¼NW¼NE¼, E½NE¼SW¼NE¼, W½NW¼SE¼NE¼.
Lunar Crater	T. 7 N., R. 53 E., sec. 3, 4, 9, 10, 15, 16, 20-22, 27-29, 33; sec, 2, W½; sec. 11, W½; sec. 14, W½; sec. 23, W½; sec. 26, W½; T. 7 N., R. 52 E., sec. 13, 24, 25, 36; T. 6 N., R. 52 E., sec. 1, 12, 13; T. 6 N., R. 53 E., sec. 1, 2, 3, 7, 10-12, 14-19; sec. 4, N½; sec. 6, S½; sec. 8, S½; sec. 9, S½.
Moores Station	T. 10 N., R. 51 E., sec. 25, SE¼SW¼; sec. 36, N½NW¼, SE¼NW¼.
Cane Man Hill	T. 3 S., R. 38 E., sec. 1, S½SE¼; sec. 12, E½; T. 3 S., R. 39 E., sec. 6, S½SW¼; sec. 7, NW¼, NW¼SW¼.
Tybo/McIntyre Charcoal Kilns	T. 6 N., R. 49 E., sec. 14, S½SW¼SW¼SW¼, SW¼SE¼SW¼SW¼; sec. 15, SE¼SE¼SE¼SE¼; sec. 22, E½NE¼NE¼NE¼; NE¼SE¼NE¼NE¼;

GENERAL LOCATION	LEGAL DESCRIPTION
Tybo/McIntyre Charcoal Kilns (con't)	sec. 23, W½NE¼NW¼NW¼, NW¼NW¼NW¼, N½SW¼NW¼NW¼, NW¼SE¼NW¼NW¼; sec. 17, S½NE¼NW¼, N½SE¼NW¼; sec. 20, S½NW¼NW¼, N½SW¼NW¼; sec. 29, E½NW¼SW¼, W½NE¼SW¼.
Amargosa-Oasis	T. 10 S., R. 47 E., sec. 28, SW¼SE¼, N½N½SE¼SE¼; T. 11 S., R. 46 E., sec. 26, S½SW¼SE¼; T. 11 S., R. 47 E., sec. 9, SW¼NW¼, SW¼SW¼; sec. 18, NE¼NE¼; sec. 32, E½SE¼SE¼; T. 12 S., R. 47 E., sec. 5, NW¼NE¼, portion of SW¼NE¼, S½NW¼; sec. 17 public lands in W½W½.
Mountain View Arrastra	T. 8 N., R. 49 E., sec. 36, S½N½NW¼NW¼, S½NE¼NW¼,N½N½SE¼NW¼.
Lockes	T. 8 N., R. 55 E., sec. 10, SE¼SE¼; sec. 15, E½NE¼, NW¼NE¼, T. 8 N., R. 56 E., sec. 11, S½SW¼; sec. 14, W½NE¼, NE¼NW¼,NW½SE½.
Gold Point	T. 7 S., R. 41½ E., sec. 3, SE¼SW¼SW¼, SW¼SE¼SW¼; sec. 10, W½NE¼NW¼, E½NW¼NW¼.
Bighorn Sheep Habitat (lambing)	T. 5 N., R. 57 E., sec. 5, E½, E½W½; T. 5 N., R. 44 E. sec. 4, W½; sec. 5, all.

APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

V. CLOSED TO NON-ENERGY LEASABLES

GENERAL LOCATION	LEGAL DESCRIPTION
The Sump	T. 1 N., R. 35 E., sec. 15, S½SE¼, S½SW¼SW¼; SE¼SW¼; sec. 16, S½SE¼; sec. 21, S½NE¼, NE¼NE¼, S½NW¼NE¼, SE¼NW¼, E½SW¼; sec. 22, all; sec. 27, NW¼NE¼, N½NW¼, SW¼NW¼, N½SE¼NW¼; sec. 28, NE¼, E½NW¼.
Clayton Valley Sand Dunes	T. 3 S., R. 39 E, sec. 14, E½, S½NW¼, SW¼; sec. 15, S½NE¼, SE¼; sec. 22, E½, E½NE¼NW¼, SE¼NW¼; sec. 23, N½, SW¼, N½NE¼SE¼, W½E½NW¼SE¼, W½W½SE¼; sec. 27, NE¼,E½NW¼, N½SE¼; sec. 26, E½NE¼, NW¼, N½SW¼.
Crescent Sand Dunes	T. 5 N., R. 41 E., sec. 25, S½; sec. 26, SE¼SE¼; sec. 35, E½; sec. 36, all; T. 4 N., R. 41 E., sec. 1, all; sec. 2, E½; T. 5 N., R. 42 E., sec. 30, S½SW¼NW¼, W½SW¼, S½SE¼SW¼; sec. 31, W½W½; T. 4 N., R. 42 E., sec. 6, W½NW¼, NW¼SW¼, N½SW¼SW¼.
The Gravel Bar	T. 9 N., R. 56 E., sec. 23, E½NE¼SE¼, E½W½NE¼SE¼; sec. 24, SE¼, N½SW¼, N½S½SW¼; T. 9 N., R. 57 E., sec. 19, S½NE¼, SE¼NW¼, E½SW¼NW¼,N½S½NW¼SW¼.

GENERAL LOCATION	LEGAL DESCRIPTION
Berlin	T. 12 N., R. 39 E., sec. 20, SE¼ (excluding MS patent; sec. 29, all).
Amargosa-Oasis	T. 10 S., R. 47 E., sec. 28, SW¼SE¼, N½N½SE¼SE¼; T. 11 S., R. 46 E., sec. 26, S½SW¼SE¼; T. 11 S., R. 47 E., sec. 9, SW¼NW¼, SW¼SW¼; sec. 18, NE¼NE¼; sec. 32, E½SE¼SE¼; T. 12 S., R. 47 E., sec. 5, NW¼NE¼, portion of SW¼NE¼, S½NW¼; sec. 17 public land in W½W½.
Railroad Valley (Lockes)	T. 8 N., R. 55 E., sec. 10, SE¼SE¼; sec. 15, E½NE¼, NW¼NE¼, T. 8 N., R. 56 E., sec. 11, S½SW¼; sec. 13, S½S½SE¼, S½N½S½SE¼; sec. 14, W½NE¼, NE¼NW¼, S½SW¼, W½SE¼, SE¼SE¼; sec. 19, W½NW¼ sec. 23, N½; sec. 24, N½, N½, S½.
Railroad Valley (Big Well)	T. 9 N., R. 56 E., sec. 34, S½SE¼, S½N½SE¼, S½N½N½SE¼,S½N½N½SW¼, SE¼SW¼; sec. 35, S½S½SE¼, S½N½S½SE¼,S½N½N½SW¼, S½N½SW¼, S½SW¼; T. 8 N., R. 56 E., sec. 2, N½, E½SE¼, E½W½SE¼; sec. 11, E½NE¼, E½W½NE¼, E½S½SW¼NW¼NE¼, E½N½NW¼SW¼NE¼, SW¼SW¼NE¼, N½N½SE¼.

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

V. CLOSED TO NON-ENERGY LEASABLES (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Railroad Valley (Blue Eagle)	T. 8 N., R. 57 E., sec. 3, NW¼, N½N½N½SW¼; sec. 4, NE¼N½NE¼NE¼NW¼, SE¼NE¼NW¼, E½SE¼NW¼, N½N½N½SE¼.
Mountain View Arrastra	T. 8 N., R. 49 E., sec. 36, S½N½NE¼NW¼, S½NE¼NE¼, N½N½SE¼NW¼.
Cane Man Hill	T. 3 S., R. 38 E., sec. 1, S½SE¼; sec. 12, E½; T. 3 S., R. 39 E., sec. 6, S½SW¼; sec. 7, NW¼, NW¼SW¼.
Jumbled Rock Petroglyphs	T. 10 N., R. 52 E., sec. 29, NE¼SW¼NE¼.
Tybo/McIntyre Charcoal Kilns	T. 6 N., R. 49 E., sec. 14, S½SW¼SW¼SW¼, SW¼SE¼SW¼SW¼; sec. 15, SE¼SE¼SE¼SE¼; sec. 22, E½NE¼NE¼NE¼; NE¼SE¼NE¼NE¼; sec. 23, W½NE¼NW¼NW¼, NW¼NW¼NW¼, N½SW¼NW¼NW¼, NW¼SE¼NW¼NW¼; T. 6 N., R. 49 E., sec. 17, S½NE¼NW¼, N½SE¼NW¼; N½SW¼NW¼; T. 6 N, R. 49 E., sec. 20, S½NW¼NW¼, N½SW¼NW¼; T. 6 N., R. 49 E., sec. 29, E½NW¼SW¼, W½NE¼SW¼.

APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

VI. CLOSED TO MINERAL MATERIALS DISPOSAL

GENERAL LOCATION	LEGAL DESCRIPTION
The Gravel Bar	T. 9 N., R. 56 E., sec. 23, E½NE¼SE¼, E½W½NE¼SE¼; sec. 24, SE¼, N½SW¼, N½S½SW¼; T. 9 N., R. 57 E., sec. 19, S½NE¼, SE¼NW¼, E½SW¼NW¼,N½S½NW¼SW¼.
The Sump	T. 1 N., R. 35 E., sec. 15, S½SE¼, S½SW¼SW¼; SE¼SW¼; sec. 16, S½SE¼; sec. 21, S½NE¼, NE¼NE¼, S½NW¼NE¼, SE¼NW¼, E½SW¼; sec. 22, all; sec. 27, NW¼NE¼, N½NW¼, SW¼NW¼, N½SE¼NW¼; sec. 28, NE¼, E½NW¼.
Moores Station	T. 10 N., R. 51 E., sec. 25, SE¼SW¼; sec. 36, N½NW¼, SE¼NW¼.
Cane Man Hill	T. 3 S., R. 38 E., sec. 1, S½SE¼; sec. 12, E½; T. 3 S., R. 39 E., sec. 6, S½SW¼; sec. 7, NW¼, NW¼SW¼.
Chimney Springs	T. 7 N., R. 55 E., sec. 16, SW¼NE¼, SE¼NW¼, NE¼SW¼, NW½SE½.
Railroad Valley (Lockes)	T. 8 N., R. 55 E., sec. 10, SE¼SE¼; sec. 15, E½NE¼, NW¼NE¼, T. 8 N., R. 56 E., sec. 11, S½SW¼; sec. 13, S½S½SE¼, S½N½S½SE¼; sec. 14, W½NE¼, NE¼NW¼, S½SW¼, W½SE¼, SE¼SE¼; sec. 19, W½NW¼ sec. 23, N½; sec. 24, N½, N½, S½.
Railroad Valley (Big Well)	T. 9 N., R. 56 E., sec. 34, S½SE¼, S½N½SE¼, S½N½N½SE¼,S½N½N½SW¼, SE¼SW¼; sec. 35, S½S½SE¼, S½N½S½SE¼,S½N½N½SW¼, S½N½SW¼, S½SW¼; T. 8 N., R. 56 E., sec. 2, N½, E½SE¼, E½W½SE¼; sec. 11, E½NE¼, E½W½NE¼, E½S½SW¼NW¼NE¼, E½N½NW¼SW¼NE¼, SW¼SW¼NE¼, N½N½SE¼.
Railroad Valley (Blue Eagle)	T. 8 N., R. 57 E., sec. 3, NW¼, N½N½N½SW¼; sec. 4, NE¼N½NE¼NE¼NW¼, SE¼NE¼NW¼, E½SE¼NW¼, N½N½N½SE¼.
Mountain View Arrastra	T. 8 N., R. 49 E., sec. 36, S½N½NE¼NW¼, S½NE¼NE¼, N½N½SE¼NW¼.
Project Faultless	T. 9 N., R. 51 E., sec. 14, 15, 22, 23, all.
Jumbled Rock Petroglyphs	T. 10 N., R. 52 E., sec. 29, NE¼SW¼NE¼.
Berlin	T. 12 N., R. 39 E., sec. 20, SE¼ (excluding MS patent; sec. 29, all).
Tybo/McIntyre Charcoal Kilns	T. 6 N., R. 49 E., sec. 14, S½SW¼SW¼SW¼, SW¼SE¼SW¼SW¼; sec. 15, SE¼SE¼SE¼SE¼; sec. 22, E½NE¼NE¼NE¼; NE¼SE¼NE¼NE¼; sec. 23, W½NE¼NW¼NW¼, NW¼NW¼NW¼, N½SW¼NW¼NW¼, NW¼SE¼NW¼NW¼; sec. 17, S½NE¼NW¼, N½SE¼NW¼; N½SW¼NW¼;

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

VI. CLOSED TO MINERAL MATERIALS DISPOSAL (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Tybo/McIntyre Charcoal Kilns (con't)	sec. 20, S½NW¼NW¼, N½SW¼NW¼; sec. 29, E½NW¼SW¼, W½NE¼SW¼.
Amargosa-Oasis	T. 10 S., R. 47 E., sec. 28, SW¼SE¼, N½N½SE¼SE¼; T. 11 S., R. 46 E., sec. 26, S½SW¼SE¼; T. 11 S., R. 47 E., sec. 9, SW¼NW¼, SW¼SW¼; sec. 18, NE¼NE¼; sec. 32, E½SE¼SE¼; T. 12 S., R. 47 E., sec. 5, NW¼NE¼, portion of SW¼NE¼, S½NW¼; sec. 17 public land in W½W½.
Rhyolite	T. 12 S., R. 46 E., sec. 9, SE¼; sec. 16, NE¼NE¼, N½SE¼NE¼, SW¼SE¼NE¼, NE¼SW¼SW¼, N½SE¼SW¼, N½S½SE¼; sec. 16, portion of E½NW¼NE¼, E½E½SW¼NE¼, SE¼SE¼NE¼, N½S½; sec. 21, SW¼SW¼NE¼NE¼, SE¼SE¼NW¼NE¼, E½NE¼SW¼NE¼, W½NW¼SE¼NE.
Lunar Crater	T. 6 N., R. 52 E., sec. 1, 12, 13; T. 6 N., R. 53 E., sec. 1-12, 14-18; sec. 20; T. 7 N., R. 52 E., sec. 13, 14, 23-26, 35, 36; sec. 27, E½, E½W½; sec. 34, E½, E½W½; T. 7 N., R. 53 E., sec. 2-4, 9-11, 13-36.

APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

VII. NO SURFACE OCCUPANCY (SEASONAL RESTRICTIONS)

GENERAL LOCATION	LEGAL DESCRIPTION
Deer Habitat (January 15-May 15)	T. 9 N., R. 51 E., sec. 1, W¼; sec. 11, 14, 15, 22, 23, 26, 27, 34, 35; all; sec. 12, W½; sec. 13, W½; sec. 16, E½; sec. 21, E½; sec. 33, E½; T. 8 N., R. 51 E., sec. 4, 5, 7; sec. 6, S½; sec. 8, NW¼; sec. 18, N½, SW¼; T. 8 N., R. 50 E., sec. 13, 23; sec. 14, S½; sec. 22, E½; sec. 24, N½; T. 6 N., R. 50 E., sec. 5, 6, 8, 18, all; sec. 17, E½ T. 7 N., R. 50 E., sec. 5, 8, 17, 20, 29, 30-32, all; T. 13 N., R. 42 E., sec. 25, 36, all; sec. 26, E½; sec. 35, E½; T. 12 N., R. 42 E., sec. 1, 11, 12, 13; sec. 2, E½; sec. 14, N½, SE¼; sec. 24, N½, SE¼; sec. 25, E½; T. 13 N., R. 43 E., sec. 31, W½W½W½; T. 12 N., R. 43 E., sec. 6, W½W½; sec. 7, W½W½; sec. 18, W½W½; sec. 19, W½W½; sec. 20, W½W½; sec. 31, W½;

GENERAL LOCATION	LEGAL DESCRIPTION
Deer Habitat (con't)	T. 11 N., R. 43 E., sec, 6, W½; sec. 7, W½, W½W½E½; sec. 18, W½W½E½; sec. 19, W½W½E½; sec. 30, NE¼, E½SE¼; sec. 31, W½, NE¼.
Sage Grouse Habitat February 15 to May 15	T. 12 N., R. 46 E., sec. 32, S½; sec. 32, S½; T. 11 N., R. 47 4., sec. 5, 6, 8, 17; sec. 7, E½, NW¼; sec. 18, E½; sec. 19, NE¼; sec. 20, W½, SE¼; sec. 21, SW¼; sec. 27, W½; sec. 28, all; sec. 29, E½. T. 12 N., R. 47 E., sec. 20, NE¼NE¼; sec. 33, S½S½SE¼; T. 11 N., R. 47 E., sec. 4, E½, SW¼; sec. 5, S½, S½NW¼; sec. 6, E½SE¼NE¼, E½E½SE¼. T. 10 N., R. 46 E., sec. 22, S½; sec. 23, S½; sec. 34, N½, SW¼; sec. 33, E½, SW¼; T. 9 N., R. 46 E., sec, 4, all; T. 9 N., R. 47 E., sec. 7, N½, SW¼; N½SE¼, SW¼SE¼; sec. 8, N½; sec. 18, N½; sec. 16, NW¼; sec. 17, N½; T. 9 N., R. 46 E., sec. 19, W½E½; sec. 35, S½; sec. 36, S½;

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

VII. NO SURFACE OCCUPANCY (SEASONAL RESTRICTIONS) (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Sagegrouse Habitat (con't)	T. 8 N., R 46 E., sec. 1, N½; sec. 2, NE¼; sec. 13, W¼; sec. 14, SE¼; sec. 23, all; sec. 24, NW¼; sec. 26, NW¼NW¼; sec. 27, N½; sec. 28, N½; sec. 29, all; sec. 31, N½; sec. 32, N½; T. 8, N., R. 45 E., sec. 36, N½; T. 11 N., R. 49 E., sec. 1, 2, 11, 12, all; T. 11 N., R. 50 E., sec. 6; sec. 7, N¼; T. 12 N., R. 50 E., sec. 6, N½; sec. 19, 30, 31; T. 13 N., R. 50 E., sec. 31, SW¼. T. 7 N., R. 45 E., sec. 10, 11, 15, 22, 27, 34; sec, 33, SW¼; T. 6 N., R. 45 E., sec. 4, E¼; sec. 9, E¼; sec. 10, W¼.
Bighorn Sheep (lambing) February 1 to May 15	T. 2 N., R. 37 E., sec, 31, 32, all; T. 1 N., R. 37 E., sec. 5, 6, 7, 8, all; T. 5 S., R. 44 E., sec. 4, W½; sec. 5, all; T. 7 N., R. 52 E., sec. 20, W½NE¼, E½NW¼, SW¼NW¼, SW¼, E½SE¼; sec. 29, all; sec. 30, 31, 32, all; T. 6 N., R. 52 E., sec. 4, NW¼; sec. 5, 6, all; T. 6 N., R. 57 E., sec. 30, E½E½NE¼; T. 5 N., R. 57 E., sec. 5, all; T. 12 S., R. 47 E., sec. 25, 36, all; sec. 26, E½; sec. 35, E½; T. 4 N., R. 39 E., sec. 20, W½E½NE¼, W½NE¼, W½, W½E½SE¼; T. 4 N., R. 38 E., sec. 13, S½; sec. 14, SE¼, E½SW¼, S½SW¼; sec. 15, S½SE¼; sec. 22, NE¼; sec. 23, N½; sec. 24, N½; T. 3 N., R. 38 E., sec. 3, W½W½; sec. 4, E½, E½W½; T. 3 N., R. 38 E., sec. 16, NW¼NE¼, N½NW¼; T. 2 N., R. 40 E., sec. 10, E½E½, W½; sec. 9, E½, E½E½; sec. 16 E½W½, E½; sec. 15, E½E¼, W¼; sec. 19, E½, E½, E½W½; sec. 20, W¼E½, W½; T. 2 N., R. 40 E., sec. 30 SE¼; sec. 29, S¼NE¼, E½, SE¼.

APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

VIII. NO SURFACE OCCUPANCY

GENERAL LOCATION	LEGAL DESCRIPTION
Jumbled Rock Petroglyphs	T. 10 N., R. 52 E., sec. 29, NE¼SW¼NE¼.
Moores Station	T. 10 N., R. 51 E., sec. 25, SE¼SW¼; sec. 36, N½NW¼, SE¼NW¼.
Cane Man Hill	T. 3 S., R. 38 E., sec. 1, S½SE¼; sec. 12, E½; T. 3 S., R. 39 E., sec. 6, S½SW¼; sec. 7, NW¼, NW¼SW¼;
Chimney Springs	T. 7 N., R. 55 E., sec. 16, SW¼NE¼, SE¼NW¼, NE¼SW¼, NW½SE½.
Tybo/McIntyre Charcoal Kilns	T. 6 N., R. 49 E., sec. 14, S½SW¼SW¼SW¼, SW¼SE¼SW¼SW¼; sec. 15, SE¼SE¼SE¼SE¼; sec. 22, E½NE¼NE¼NE¼; NE¼SE¼NE¼NE¼; sec. 23, W½NE¼NW¼NW¼, NW¼NW¼NW¼, N½SW¼NW¼NW¼, NW¼SE¼NW¼NW¼; T. 6 N., R. 49 E., sec. 17, S½NE¼NW¼, N½SE¼NW¼; N½SW¼NW¼; T. 6 N, R. 49 E., sec. 20, S½NW¼NW¼, N½SW¼NW¼; T. 6 N., R. 49 E., sec. 29, E½NW¼SW¼, W½NE¼SW¼.
Amargosa-Oasis	T. 10 S., R. 47 E., sec. 28, SW¼SE¼, N½N½SE¼SE¼; T. 11 S., R. 46 E., sec. 26, S½SW¼SE¼; T. 11 S., R. 47 E., sec. 9, SW¼NW¼, SW¼SW¼;

GENERAL LOCATION	LEGAL DESCRIPTION
Amargosa-Oasis (con't)	sec. 18, NE¼NE¼; T. 12 S., R. 47 E., sec. 5, NW¼NE¼, portion of SW¼NE¼, S½NW¼; sec. 17 public land in W½W½.
Mountain View Arrasta	T. 8 N., R. 49 E., sec. 36, S½N½NE¼NW¼, S½NE¼NW¼, N½N½SE¼NW¼.
Railroad Valley (Lockes)	T. 8 N., R. 55 E., sec. 10, SE¼SE¼; sec. 15, E½NE¼, NW¼NE¼, T. 8 N., R. 56 E., sec. 11, S½SW¼; sec. 13, S½S½SE¼, S½N½S½SE¼; sec. 14, W½NE¼, NE¼NW¼, S½SW¼, W½SE¼, SE¼SE¼; sec. 19, W½NW¼ sec. 23, N½; sec. 24, N½, N½, S½.
Railroad Valley (Big Well)	T. 9 N., R. 56 E., sec. 34, S½SE¼, S½N½SE¼, S½N½N½SE¼,S½N½N½SW¼, SE¼SW¼; sec. 35, S½S½SE¼, S½N½S½SE¼,S½N½N½SW¼, S½N½SW¼, S½SW¼; T. 8 N., R. 56 E., sec. 2, N½, E½SE¼, E½W½SE¼; sec. 11, E½NE¼, E½W½NE¼, E½S½SW¼NW¼NE¼, E½N½NW¼SW¼NE¼, SW¼SW¼NE¼, N½N½SE¼.
Railroad Valley (Blue Eagle)	T. 8 N., R. 57 E., sec. 3, NW¼, N½N½N½SW¼; sec. 4, NE¼N½NE¼NE¼NW¼, SE¼NE¼NW¼, E½SE¼NW¼, N½N½N½SE¼.

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APPENDIX 16

LEGAL DESCRIPTIONS FOR LAND PLANNING/MANAGEMENT ACTIONS

VIII. NO SURFACE OCCUPANCY (Continued)

GENERAL LOCATION	LEGAL DESCRIPTION
Clayton Valley Sand Dunes	T. 3 S., R. 39 E, sec. 14, E½, S½NW¼, SW¼; sec. 15, S½NE¼, SE¼; sec. 23, N½, SW¼, N½NE¼SE¼, W½E½NW¼SE¼, W½W½SE¼; sec. 27, NE¼,E½NW¼, N½SE¼; sec. 26, E½NE¼, NW¼, N½SW¼.
Crescent Sand Dunes	T. 5 N., R. 41 E., sec. 25, S½; sec. 26, SE¼SE¼; sec. 35, E½; sec. 36, all; T. 4 N., R. 41 E., sec. 1, all; sec. 2, E½; T. 5 N., R. 42 E., sec. 30 S½SW½NW¼, W½SW¼, S½SE¼SW¼; sec. 31, W½W½; T. 4 N., R. 42 E., sec. 6, W½NW¼, NW¼SW¼, N½SW¼SW¼.

APPENDIX 17

DETERMINATION OF AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECS)

No ACECs were designated in the Resource Area through previous land-use plans.

In March, 1990, the Tonopah Resource Area Office sent a letter to interested publics requesting nominations for ACECs to be considered in development of the Tonopah Resource Management Plan (RMP). Based on the submissions from members of the public, other public agencies, and the Tonopah RMP team, 43 areas were identified that appeared to require some type of special management for added protection of unique values. Each nomination was then screened by the RMP team to determine the relevance and importance criteria described in *BLM Manual 1613*.

An area meets the relevance criteria if it contains one or more of the following:
1) A significant historic, cultural, or scenic value, 2) A fish and wildlife resource, 3) A natural process or system, 4) Natural hazards.

An area meets the importance criteria if it contains one or more of the following:
1) Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource, 2) Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change, 3) Has been recognized as warranting protection to satisfy national priority concerns or to carry out the mandates of FLPMA, 4) Has qualities which warrant highlighting to satisfy public or management concerns about safety and public welfare, 5) Poses a significant threat to human life and safety or to property.

Of the 43 areas nominated, 33 did not meet relevancy and importance criteria, and were not included for consideration in the *Draft Tonopah RMP/EIS*. Ten were found to meet the criteria for relevance and importance. Consistent with the themes of the Alternatives presented in the *Draft RMP*, two were proposed as ACECs in Alternative 2, ten in Alternative 3, and seven in Alternative 4 (Preferred Alternative). The Proposed RMP mostly adopts Alternative 4 which would designate seven ACECs (see Maps 26 and 27). The only change is that the proposed Rhyolite ACEC was increased in size as a result of public and internal BLM comment on the *Draft RMP*.

DESCRIPTION OF 7 AREAS RECOMMENDED FOR ACEC DESIGNATION IN PROPOSED RMP

1. LUNAR CRATER is northeast of Warm Springs, Nevada. This ACEC which is 39,680 acres would combine two areas (Lunar Crater - 24,980 acres and Black Rock Lava Flow aka Big Springs Valley Lava Field - 14,700 acres) proposed as separate ACECs into one.

RATIONALE: Outstanding geological phenomenon.

RELEVANCE: Rare geological occurrence representing a natural process.

IMPORTANCE: Lunar Crater is listed on the National Natural Landmark Register. The area is on a proposed Scenic Byway. The area encompasses a volcanic field including Lunar Crater, Easy Chair Crater, various cinder cones, and Black Rock Lava Flow, a flow which comes out of a collapsed side of a volcanic crater.

2. AMARGOSA-OASIS includes 13 separate locations totaling approximately 490 acres each around Beatty, Nevada.

RATIONALE: Rare vertebrates, plants and riparian communities in need of protection.

RELEVANCE: Represents a natural process.

IMPORTANCE: Provides habitat for the following C2 species: Amargosa toad (*Bufo nelsoni*), the Oasis Valley speckled dace (*Rhinichthys osculus* ssp.) and funeral black wooly-pod (*Astragalus funereus*). The area is also significant because of unique occurrences of vertebrates. Also, riparian areas in desert environments are of importance. Indian Springs provides water for Beatty. The Amargosa Narrows contains a highway, gravel pit, pipeline to sewage lagoons, rapid infiltration ponds and other authorized uses.

3. CANE MAN HILL Petroglyph District is a series of petroglyphs located on a hill on the west side of Clayton Valley at the southern end of the Silver Peak Range. The area encompasses approximately 680 acres.

RATIONALE: The site is in need of protection.

RELEVANCE: Cultural resource values.

IMPORTANCE: The district consists of a series of petroglyphs clustered around an area dubbed "Cane Man Hill" by the archaeologist who located the petroglyphs. The petroglyphs contain an element that is unusual for this area and appears to be common to the southwestern U.S. The petroglyphs are in danger from vandals. It could also be adversely affected by some project related activities such as mining.

4. LONE MOUNTAIN is west of Tonopah, Nevada. Approximately 14,400 acres have been proposed for consideration.

RATIONALE: Rare and endemic plant species are in need of special management and protection.

RELEVANCE: Represents a natural process.

IMPORTANCE: Provides habitat for *Haplopappus graniticus*, a C2 species. The area also contains natural plant communities in near pristine condition containing endemic plant species and habitat representative of Nevada's species diversity. Joshua trees grow at a relatively high elevation at the north end of their range in association with pinyon trees. The area contains a native bighorn sheep population.

5. RAILROAD VALLEY Wildlife Management Area is located in the northeast portion of the Resource Area. The nomination includes the critical habitat for Railroad Valley Spring fish and riparian habitats. Approximately 15,470 acres has been proposed.

RATIONALE: The Railroad Valley area needs special management to protect wildlife resource values.

RELEVANCE: Contains a wildlife resource.

IMPORTANCE: Provides habitat for the Railroad Valley springfish (*Crenichthys nevadae*), a federally threatened species. Threatened species are more than locally significant. The Railroad Valley Wildlife Management Area provides riparian habitat for migrating waterfowl and species diversity. The Railroad Valley Wildlife Management Area was originally recognized in a 1934 Executive Order and is under a federal protective withdrawal. The oil and gas potential is high.

6. RHYOLITE is located at the northern end of the Amargosa Desert, west of Beatty, Nevada. The Bullfrog Hills border the townsite to the north, east, and west. Approximately 425 acres have been identified for designation.

RATIONALE: This area needs special management due to the complexity of the problems/concerns for this area. The area contains some private residences interspersed with public land. The public land portion of the townsite is covered with unpatented mining claims. The mining claimant has a legal right to explore, develop and mine those claims. A large open pit mine is situated just on the other side of a mountain from the townsite. The ruins are in an advanced state of decay. This office has received many letters from interested members of the public expressing their concern over the preservation of this site.

RELEVANCE: Historical interest.

IMPORTANCE: The ruins of the 1905 townsite bring in tourists from all over the world. The Rhyolite portion of the townsite contained structures of rock and/or reinforced concrete, some as much as three stories tall. It is the most photographed "ghost town" in Nevada. (From personal communication, Nevada State Historic Preservation Officer (SHPO)). A house constructed of approximately 50,000 bottles is also located in the townsite.

7. TYBO-MCINTYRE CHARCOAL KILNS are located in the Hot Creek Range, north of Warm Springs, Nevada and encompass four separate sites of 20 acres each for a total of 80 acres.

RATIONALE: The charcoal kilns are in need of protection.

RELEVANCE: A significant historical resource.

IMPORTANCE: The McIntyre Charcoal kilns consist of three sets, a northern, middle, and southern set and are constructed of brick. The Tybo Charcoal Kilns are constructed of stone.

The Tybo Charcoal Kilns are listed on the National Register of Historic Places. The charcoal kilns are very important to the history of mining/milling in the west. People throughout the United States are interested in these kilns. The kilns are being vandalized. The brick off the kilns has been taken to make patios, etc. All kilns may be adversely affected by some types of project activities, such as mining.

DESCRIPTION OF AREAS NOMINATED BUT NOT PROPOSED AS ACECS

The 36 other areas nominated through the process, but not recommended are discussed below.

1. STORMY-ABEL Prehistoric District (12,320 acres) is comprised of a number of prehistoric sites centered around Storm Spring, Abel Spring, and Coyote Spring on the west side of northern Railroad Valley. Although this nomination met the relevancy and importance criteria and was proposed in Alternative 3 of the Draft RMP, other protective measures proposed in the Proposed RMP for this area will prevent destruction of important cultural resources.

2. TIMBER MOUNTAIN CALDERA National Natural Landmark (NNL) (7,040 acres). Most of the NNL (over 100,000 acres) is located within the Nellis Air Force Range. Approximately 7,040 acres of the NNL extends across the Range boundary into the Resource Area. Although the entire NNL meets the relevancy and importance criteria, the portion within the Resource Area is over 5 miles from the actual caldera formation and, in itself, possesses no particularly unique geological values. Therefore, the area is not recommended.

3. TRAP SPRINGS-GRAVEL BAR Prehistoric District (8,480 acres) contains prehistoric sites located on sand dunes, alluvial plain and a lake shore feature in northern Railroad Valley. Although this nomination met the relevancy and importance criteria, other protective measures proposed in the Proposed RMP for this area will prevent destruction of important cultural resources.

4. BIG MOLY (9,600 acres) in western Esmeralda County is a scenic overlook into the north end of Death Valley. This does not meet the criteria for relevance, or importance.

5. BRICKYARD CANYON (320 acres) near Goldfield was examined for special cultural and geological values. This area does not meet the criteria for importance.

6. CRESCENT SAND DUNES (3,000 acres) is a sand dune complex near Tonopah which may supports uncommon invertebrates. This area does not meet the criteria for importance.

7. EMIGRANT CANYON (9300 acres) located south of Coaldale Junction has special scenic and geological values. This area does not meet the criteria for relevancy, or importance.

8. GILBERT HISTORICAL SITE (100 acres) has historical values. This area does not meet the criteria for relevance, or importance.

9. GOLDFIELD JOSHUA TREE FOREST (9,900 acres) is the northern most extremity of Joshua trees. This area does not meet the criteria for relevance, or importance.

10. GOLD POINT HISTORICAL SITE (150 acres) has historical values. This area does not meet the criteria for relevance, or importance.

11. KAWICH RANGE (40,000 acres) supports uncommon plant species. This area does not meet the criteria for relevancy, or importance.

12. MONOCLINE-CRATER (4,800 acres) has special geological values. This area does not meet the criteria for relevancy, or importance.

13. MOUNT JACKSON (900 acres) has occurrences of representative Great Basin plant communities in excellent condition along with occurrence of an uncommon plant. This area does not meet the criteria for importance.

14. PINYON-JOSHUA TRANSITION NATURAL AREA (550 acres) was established as a natural area through a previous land-use plan. Proposed Lone Mountain ACEC has more significant pinyon-Joshua tree transition. This area does not meet the criteria for relevancy, or importance.

15. RHYOLITE RIDGE (160 acres) located west of Silver Peak has occurrence of an uncommon plant. This area does not meet the criteria for importance.

16. STONEWALL MOUNTAIN (960 acres) has occurrence of representative riparian plant communities along with uncommon plants. This area does not meet the criteria for importance.

17. THE SUMP aka Fish Lake Valley Badlands (1,600 acres) has occurrence of eroded badlands formation with scenic, paleontological, and geological values. This area does not meet the criteria for relevancy.

18. TONOPAH GEM FIELDS (80 acres) has geological values. This area does not meet the criteria for relevancy, or importance.

19. WHITE ROCK CANYON (40 acres) located northeast of Tonopah has scenic values. This area does not meet the criteria for relevancy, or importance.

20. YELLOW HILLS (4,000 acres) has scenic values. This area does not meet the criteria for relevancy, or importance.

21. SHEEP MOUNTAIN WASH (600 acres) located northeast of Silver Peak has scenic values. This area does not meet the criteria for relevancy, or importance.

22. JUMBLED ROCK PETROGLYPH (10 acres) has examples of Great Basin petroglyphs. This area does not meet the criteria for importance.

23. SOBERUP GULCH PETROGLYPH (20 acres) has examples of Great Basin petroglyphs. This area does not meet the criteria for importance.

24. MOORES STATION PETROGLYPHS (40 acres) has examples of Great Basin petroglyphs. This area does not meet the criteria for importance.

25. WEEPAH HISTORICAL SITE (100 acres) has historical values. This area does not meet the criteria for relevance, or importance.

26. SILVER BOW HISTORICAL SITE (40 acres) has historical values. This area does not meet the criteria for relevance, or importance.

27. STONE CABIN VALLEY (400,000 acres) has occurrence of wild horses. This area does not meet the criteria for relevance, or importance.

28. OATMEAL SPRING (20 acres) located near Coaldale Junction has example of eroded badlands. This area was dropped because it is located on private lands.

29. FISH LAKE (20 acres) has uncommon fish species. This area was dropped because it is located on private lands.

30. LITTLE FISH LAKE VALLEY (40 acres) has an uncommon fish. This area was dropped because it is located on private lands.

31. BIG SPRINGS VALLEY LAVA FIELD (14,700 acres) was included in the Proposed Lunar Crater ACEC.

32. SARCOBATUS FLATS (30,000 acres) supports a large playa with hard surface. This area does not meet the criteria for relevance, or importance.

33. HOT CREEK VALLEY (5,000 acres) has threatened fish species and an uncommon plant. This area was dropped because it is located on private lands and also lands administered by the Forest Service.

34. CRYSTAL SPRING (10 acres) located north of Beatty was included in the Proposed Amargosa-Oasis ACEC.

35. LOCKES (400 acres) was included in the Proposed Railroad Valley ACEC.

36. OASIS VALLEY (40 acres) was included in the Proposed Amargosa-Oasis ACEC.

APPENDIX 18

United States Department of the Interior

FISH AND WILDLIFE SERVICE
NEVADA ECOLOGICAL SERVICES STATE OFFICE
4600 Kietzke Lane, Building C-125
Reno, Nevada 89502-5093

August 12, 1994
File No. 1-5-94-F-284

Memorandum

To: District Manager, Battle Mountain District, Bureau of Land Management, Battle Mountain, Nevada

From: State Supervisor, Ecological Services, Reno, Nevada

Subject: Biological Opinion on Implementation of the Proposed Tonopah Resource Management Plan

This Biological Opinion responds to your July 19, 1994, request for formal consultation with the Fish and Wildlife Service (Service) pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). Your request was received in this office on July 26, 1994, and initiated on that date. At issue are the possible effects that implementation of the Bureau of Land Management's (Bureau) proposed Tonopah Resource Management Plan (RMP) may have on the threatened desert tortoise (*Gopherus agassizii*) and Railroad Valley springfish (*Crenichthys nevadae*) and their respective critical habitats. This formal consultation was conducted pursuant to the regulations governing interagency cooperation under the Act (50 CFR § 402).

This Biological Opinion was prepared using information contained in the Bureau's preliminary final *Proposed Tonopah Resource Management Plan and Final Environmental Impact Statement* submitted to the Service on July 26, 1994; a meeting held on June 6, 1994; conversations with your staff; and information in our files.

Description of the Proposed Action

The Bureau proposes to implement its proposed Tonopah RMP, which provides direction for managing the natural resources on public lands within the Tonopah Resource Area (RA). The Bureau identified the need for the Tonopah RMP following an evaluation of the existing *Tonopah Management Framework Plan* and the *Esmeralda-Southern Nye Resource Management Plan*. The evaluation revealed that these two documents, which currently guide management of the Tonopah RA, provided inadequate guidance for long-term management of many resources due to a combination of expanding resource development and changes in management direction. Additionally, Bureau program guidance mandates that existing land use plans be amended to address oil and gas exploration and development.

The proposed Tonopah RMP is based on the preferred alternative in the Bureau's *Tonopah Draft Resource Management Plan*, issued in June 1993, and modifications based on public and internal comment. The preferred alternative provides for the development of renewable and non-renewable resources, while ensuring the preservation and enhancement of fragile and unique resources. The proposed Tonopah RMP includes determinations to continue existing management decisions and implement new decisions. The decisions will be final when the Bureau's Nevada State Director approves and issues the Record of Decision for the Tonopah RMP. Actions will be implemented after site-specific management plans are developed and appropriate clearances obtained. Some actions cannot be implemented immediately because they require approval from the Secretary of the Interior, but the Bureau intends to pursue all actions recommended in the proposed Tonopah RMP and included in the Record of Decision.

The determinations within the preliminary final *Proposed Tonopah Resource Management Plan* which pertain to this consultation are as follows:

Wildlife Habitat Management

1.b. Lockes Meadow, Blue Eagle Pond, Big Well, Chimney Springs, Reynolds Springs, and North Spring (a total of 2,317 acres) will continue to be excluded from livestock grazing to achieve riparian objectives, in accordance with the Railroad Valley Habitat Management Plan (HMP). Use by livestock in these locations may be allowed on a non-renewable basis to achieve objectives identified in the Railroad Valley HMP. Livestock will be excluded from the Amargosa-Oasis Area of Critical Environmental Concern (ACEC) (490 acres).

3.a. The Railroad Valley HMP will be maintained.

Special Status Species

1. Manage Non-Intensive Category III desert tortoise habitat (70,600 acres) by limiting vehicle use to existing roads and trails. In cases in which new road construction is discretionary, no new roads will be constructed in those washes in which there may be an adverse impact on the desert tortoise.

2. Protect the Railroad Valley springfish and it's critical habitat at North Spring and Reynolds Springs (80 acres) through management in accordance with the Railroad Valley HMP. Fluid mineral leasing

is allowed on 80 acres with a no surface occupancy stipulation. No land uses will be authorized which are incompatible with the area's values. In addition, Chimney Springs will also be managed to protect Railroad Valley springfish.

3. Designate 15,470 acres as the Railroad Valley ACEC to protect riparian areas, wildlife habitat, and threatened species habitat.

4. Management of this area includes: Acquisition of non-consumptive appropriative water rights; continued exclusion of livestock from 2,317 acres; designation of a utility corridor through the Blue Eagle portion of the ACEC below the Grant Range; acquisition of 480 acres of private lands through exchange or purchase at Lockes Ranch, if economically prudent, and if the owner if agreeable; limiting vehicle use to existing roads and trails in the ACEC; establish a Special Recreation Management Area; allowing fluid mineral leasing with a no surface occupancy stipulation on 3,480 acres; reducing the existing withdrawal to mineral entry from 14,710 acres to 3,040 acres; and withdrawing an additional 440 acres of riparian area at Lockes Pond.

5. Habitat for all candidate species (plant and animal) will be managed to maintain or increase current populations of these species. The introduction, reintroduction, or augmentation of candidate, as well as federally listed threatened or endangered species, may be allowed, if in coordination with Nevada Division of Wildlife and the Service, it is deemed appropriate. Such actions will be considered on a case-by-case basis and will be subject to applicable procedures outlined under the Standard Operating Procedures, Environmental Review, and Management.

Riparian Habitat

1. Manage for proper functioning condition on all 32.8 miles of streams, streamside riparian areas, and all springs, seeps, wet meadows, and other riparian areas in the RA.

Livestock Grazing Management

1.c. Livestock use will continue to be excluded on Lockes Meadow, Blue Eagle Pond, Big Well, Reynolds Spring, North Spring, and Chimney Springs in accordance with Railroad Valley HMP objectives (2,317 acres). Livestock use may be allowed in these areas on a non-renewable basis and in a prescribed manner to achieve or maintain the objectives identified in the HMP.

1.d. On 70,600 acres of Non-Intensive Category III desert tortoise habitat, and in accordance with the Service's *Biological Opinion for the Proposed Livestock Program within Desert Tortoise Habitat in Southern Nevada*, dated August 14, 1991 (Service File Number 1-5-91-F-36), the following terms and conditions have been placed in affected grazing leases:

Livestock use within desert tortoise habitat may occur from March 1 through October 14; forage utilization shall not exceed 40 percent on key perennial grasses, forbs, and shrubs.

Livestock use in desert tortoise habitat may occur from October 15 through February 28; forage utilization shall not exceed 50 percent on key perennial grasses and 45 percent on key shrubs and perennial forbs.

Should utilization exceed 40 percent on key perennial grasses, forbs, and shrubs during the period of March 1 through October 14; or 50 percent on key perennial grasses and 45 percent on key shrubs and perennial forbs during the period of October 25 through February 28, the lessee shall have ten (10) calendar days in which to remove all livestock from desert tortoise habitat. Utilization within each allotment shall not be averaged either among locations or over time.

All vehicle use in desert tortoise habitat associated with the livestock grazing program shall be restricted to existing roads and trails.

Trash and garbage associated with livestock grazing operations (i.e., branding, roundups, etc.) shall be removed from each camp site or work location and disposed of offsite in a designated facility. No trash or garbage shall be buried at the work locations within desert tortoise habitat.

Use of hay or grains as a feeding supplement shall be prohibited in desert tortoise habitat to avoid the introduction of non-native plant species. Mineral and salt blocks may be authorized in accordance with CFR § 4100.

Lands and Rights-of-Way

5. Acquire private lands, if economically prudent and if the owner is agreeable, through exchange and/or purchase at ... , Lockes Ranch (480 acres)... All acquired lands will be managed in accordance with the RMP and activity plans.

6.b. Rights-of-way allowed within the following areas will have to be compatible with the special values of the area: No new roads will be authorized in desert tortoise habitat if there will be an adverse impact to tortoise (70,600 acres); ... Railroad Valley ACEC (15,470 acres)...

12. Withdraw an additional 28,996 acres from mineral entry as follows: ... Railroad Valley (440 acres).

Areas of Critical Environmental Concern

2. Designate 15,470 acres as the Railroad Valley ACEC to protect riparian areas, wildlife habitats, and threatened species habitats. Acquire non-consumptive appropriative water rights. Continue to exclude livestock from 2,317 acres. No land uses will be authorized which are incompatible with the area's values. A utility corridor through a portion of the ACEC will be designated west of the Grant Range. Acquire 480 acres of private lands through exchange or purchase at Lockes Ranch. Limit vehicle use to existing roads and trails in the ACEC. Establish a Special Recreation Management Area. Allow fluid mineral leasing with a no surface occupancy stipulation on 3,480 acres. Reduce

the existing withdrawal to mineral entry from 14,710 acres to 3,040 acres, and withdraw an additional 440 acres of riparian area at Lockes Pond. Close 3,480 acres to mineral material disposal.

Recreation

3. In the following areas vehicles will be limited to existing roads and trails: Desert tortoise habitat (70,600 acres); ... Railroad Valley ACEC (15,470 acres)...

4. The following areas will be closed to competitive events: ... Railroad Valley ACEC (15,470 acres)...

Fluid Minerals

4. The following areas totalling 50,424 acres will be open to mineral leasing with a no surface occupancy stipulation: ... a portion of the Railroad Valley ACEC (3,480 acres)...

Locatable Minerals

3. Reduce the withdrawal of the Railroad Valley Wildlife Management Area from 14,710 acres to 3,040 acres.

5. Withdraw an additional 28,996 acres from mineral entry as follows: ... and Railroad Valley ACEC (440 acres).

Mineral Materials

5. The following areas will be closed to mineral material disposal: ... portions of the Railroad Valley ACEC (3,480 acres), ...

Non-Energy Leasable Minerals

2. Close 55,349 acres to non-energy mineral leasing as follows: ... portions of the Railroad Valley ACEC (3,480 acres), ...

Fire Management

3. Wildfires that threaten resources, such as critical watersheds, riparian areas, ..., sensitive species sites, ... will be kept to minimum acreage utilizing suppression action which could suppress and/or divert the fire and be cost effective and efficient.

The Bureau has developed Standard Operating Procedures that will be applied to all actions identified in the preliminary final *Proposed Tonopah Resource Management Plan*. Those procedures which pertain to this consultation are listed below.

Environmental Review and Management

In compliance with the National Environmental Policy Act and Council of Environmental Quality regulations, the Bureau will prepare site-specific environmental reviews before actions proposed in this RMP are implemented or prior to approval of any project authorized on the public lands.

Special Status Species

In accordance with section 7 of the Act, consultation with the Service will be conducted on all Federal actions involving threatened or endangered species.

A desert tortoise inventory will be required prior to any surface-disturbing activity including plans of operations for locatable minerals, mineral leasing, off-highway vehicle events, rights-of-way, etc., on 70,600 acres of Non-Intensive Category III desert tortoise habitat.

In accordance with the Service's *Biological Opinion for the Proposed Livestock Program within Desert Tortoise Habitat in Southern Nevada*, the following stipulations have been placed in affected grazing licenses: Within Non-Intensive Category III desert tortoise habitat, livestock use may occur March 1 to October 14, as long as forage utilization does not exceed 40 percent on key perennial grasses, forbs and shrubs. Between October 15 and February 28, forage utilization shall not exceed 50 percent on key perennial grasses and 45 percent on key shrubs and perennial forbs.

Lands

Site-specific decisions regarding land ownership adjustments within the RA are to be made based on if the lands are needed for Bureau programs, or if they are considered more valuable for other purposes. The following criteria are applied to site-specific determinations for lands that are within areas identified for disposal or acquisition:

A. Public resource values, including, but not limited to:

--threatened, endangered, or sensitive species habitat

--riparian areas, including springs and seeps

Prior to issuance of a right-of-way authorization, a site specific environmental analysis is performed which considers, among other things, threatened, endangered, or sensitive species habitat; ... riparian areas, ...

Areas of Critical Environmental Concern

A plan of operations will be required for any proposed mechanized disturbance to be caused in a designated ACEC during the search for, or exploitation of locatable minerals. No mineral material sales will be allowed within any ACEC except certain areas identified in the Railroad Valley ACEC.

Fluid Minerals

Consultation with the Service is required per section 7 of the Act prior to approval of an Application for a Permit to Drill or other lease operations, if a proposed listed or listed threatened or endangered species or its critical habitat is likely to be affected by project activities. If there is deemed to be any adverse impact, the proposal would be modified or the request denied.

Fire Management

There will be no use of fire retardant in riparian areas, ... unless such use is authorized by the authorized officer.

Status of the Listed Species / Environmental Baseline

Desert Tortoise

The desert tortoise is a large, herbivorous reptile which is generally active when annual plants are most common (spring, early summer, and autumn). Desert tortoises usually spend the remainder of the year in shelter sites, escaping the extreme weather conditions of the desert. Sheltering habits of desert tortoises vary greatly in different geographic locations. Shelter sites may be located under bushes, in the banks or beds of washes, in rock outcrops, or in caliche caves. Egg laying occurs from May through July, although forage must be adequate beforehand to allow females to accumulate necessary energy reserves for egg production. Desert tortoises can increase egg production in years of good rainfall and forage production by increasing the number of clutches. Hatchlings generally emerge from August through October, although some eggs may overwinter so that the hatchlings emerge in the spring. Further information on the range, biology, and ecology of the desert tortoise can be found in the *Desert Tortoise (Mojave population) Recovery Plan* (Service 1994a).

In April 1992, the Service determined the Mojave population of the desert tortoise to be threatened pursuant to section 4 of the Act (55 Federal Register 12178). The Mojave population includes those animals living north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and Utah; and in the Colorado Desert (a division of the Sonoran Desert) in California. In Nevada, the species' native range is generally restricted to Clark County, and those portions of Nye, Lincoln, and Esmeralda Counties south of 37° north latitude and below approximately 1,330 meters elevation. The species was listed as threatened because of habitat loss throughout its range from construction projects, such as roads, residential dwelling, and energy developments, and conversion of native habitat to agriculture. Grazing and off-highway vehicles have degraded additional habitat. The desert tortoise's continued existence is also threatened by illegal collection, upper respiratory tract disease, and predation on juvenile desert tortoises by common ravens (*Corvus corax*).

The *Desert Tortoise (Mojave Population) Recovery Plan* (Recovery Plan) (Service 1994a) divides the range of the desert tortoise into six recovery units and recommends establishment of 14 Desert Wildlife Management Areas (DWMA) within these recovery units. DWMAs are defined areas in which recovery actions would be implemented to provide for the long-term persistence of viable tortoise populations and the ecosystem upon which they depend. The Recovery Plan

recommends that specific management actions be implemented within each DWMA to effect recovery of the species. The desert tortoise habitat of the Tonopah RA, however, is not within any of the recommended DWMAs.

In February 1994, the Service designated approximately 6.4 million acres of critical habitat for the Mojave population of the desert tortoise (59 Federal Register 5820). Desert tortoise critical habitat encompasses portions of the Mojave and Colorado Desert that contain the primary constituent elements for the species' survival and focuses on areas that are essential to the species' recovery. The critical habitat boundaries are based on the proposed DWMAs identified in the Recovery Plan. There is no desert tortoise critical habitat within the Tonopah RA.

In 1988, the Bureau classified desert tortoise habitat on public lands into three categories based on the following criteria: (1) Importance of the habitat to maintaining viable populations; (2) conflicts are resolvable; (3) desert tortoise density; and (4) desert tortoise population status (Spang et al. 1988). The desert tortoise habitat within the Tonopah RA (approximately 70,600 acres) has been classified as Category III habitat because: (1) The habitat is not essential to the maintenance of viable populations; (2) most conflicts are not resolvable; (3) the low- to medium-density desert tortoise population is not contiguous with a medium- or high-density population; and (4) the desert tortoise population is stable or declining. The Bureau's goal for management of Category III desert tortoise habitat is to limit habitat and population declines to the extent possible by mitigating impacts (Spang et al. 1988).

Railroad Valley Springfish

In 1986, the Railroad Valley springfish was federally listed as a threatened species and its critical habitat designated pursuant to the Act because suitable habitat had decreased since the species' description in 1932 (51 Federal Register 10857). Critical habitat includes portions of six spring systems in Railroad Valley: Big Warm Spring, Little Warm Spring, North Spring, Hay Corral Spring, Reynolds Springs, and Big Spring. Known constituent elements of Railroad Valley springfish critical habitats include clear, unpolluted, thermal (29° to 36° Centigrade {C}) spring pools, flowing channels, and marshy areas with aquatic plants, insects, and mollusks (51 Federal Register 10857). Railroad Valley springfish populations have also been established at Sodaville Spring, Mineral County; Chimney Spring, Railroad Valley, Nye County; Dugan Ranch spring, and Hot Creek Canyon, Nye County,

North Spring, Reynolds Springs, and Chimney Spring are on public land within the Bureau's Tonopah RA. The remainder of the springs are on private property, although portions may cross onto public land (Service 1994b).

Railroad Valley springfish currently occupy all 9 historical and introduction sites. Some populations have been severely impacted by habitat modification and nonnative species introductions. All populations are susceptible to habitat loss or degradation due to altered spring flow which may result from any event, natural or human induced, which alters the hydrology of the Railroad Valley ground water basin.

The *Public/Agency Review Draft of the Railroad Valley Springfish, Crenichthys nevadae, Recovery Plan* (Service 1994b) recommends that all six historically occupied habitats be secured from all identifiable threats so that viable populations of Railroad Valley springfish can exist in each. Additionally, the introduced Railroad Valley springfish populations should be maintained and managed as refugia populations to prevent the extinction of the species due to catastrophic events which may significantly affect all historical habitats at once. Two historical populations (North Spring and Reynolds Springs) and one introduced population (Chimney Spring) occur within the Tonopah RA.

Railroad Valley springfish spawning activity is restricted to areas with water temperatures between 28° and 35° C, although the species can tolerate temperature extremes of 14° to 40° C for short periods of time. Spawning occurs from early spring through late autumn. Railroad Valley springfish are indiscriminant and opportunistic feeders, ingesting a wide variety of foods. The species is primarily herbivorous during the spring, consuming primarily filamentous algae, but shifts to carnivory by summer, when animal foods are more common. Further information on the species' life history and habitat requirements can be found in the *Public/Agency Review Draft of the Railroad Valley Springfish, Crenichthys nevadae, Recovery Plan* (Service 1994b).

Effects of the Proposed Action on the Listed Species

Implementation of the Bureau's Tonopah RMP, as presented in the preliminary final proposed version, may directly or indirectly affect desert tortoise and Railroad Valley springfish. Authorization of livestock grazing, rights-of-way, or any other surface-disturbing activity may modify the habitat upon which desert tortoises depend. Desert tortoises may be killed or injured by vehicles or equipment associated

with construction of access roads or utility lines within rights-of-way, or by vehicles driven off of authorized roads. Desert tortoises may be harassed by removal from project sites or adjacent roads.

The spring habitats occupied by Railroad Valley springfish may be degraded by various oil and gas activities which impact the ground water basin(s) supporting these habitats. The use of subsurface explosions during geophysical exploration, creation of artesian wells during exploratory drilling, and development of water wells to support oil field development may affect the discharge of springs in the vicinity. Any of these activities may decrease spring flow and/or alter water chemistry and temperature such that the aquatic habitat is no longer suitable for Railroad Valley springfish. Oil accidentally spilled from pipelines or transport trucks which enters any spring system occupied by Railroad Valley springfish may result in fish mortality and adversely affect overall aquatic habitat conditions such that recovery efforts are hampered.

The Bureau, however, has incorporated protective measures into the Tonopah RMP to minimize the effects of the recommended decisions on listed species. Livestock grazing in desert tortoise habitat will be authorized following the guidelines established in previous section 7 consultations. The Tonopah RMP also includes decisions which will directly benefit the Railroad Valley springfish, such as exclusion of livestock grazing from the species habitat. Many of the actions identified in the Tonopah RMP serve to implement tasks recommended in the *Public/Agency Review Draft of the Railroad Valley Springfish, Crenichthys nevadae, Recovery Plan* (Service 1994b). The Bureau will also request additional section 7 consultation with the Service for each specific action the Bureau determines may affect a listed species.

The Service has determined that the impacts described herein will not appreciably reduce the likelihood of survival and recovery of desert tortoise and Railroad Valley springfish, or destroy or adversely modify Railroad Valley springfish critical habitat. No desert tortoise critical habitat or identified recovery units occur within the planning area.

Cumulative Effects

Cumulative effects are those effects of future non-Federal (State, local government, or private) activities on endangered and threatened species or their respective critical habitats that are reasonably certain to occur during the course of the Federal activity subject to consultation under section 7

of the Act. Future Federal actions are subject to the consultation requirements established in section 7 of the Act and, therefore, are not considered cumulative to the proposed action.

The Service is aware of no future private activities within the Tonopah RA which may affect the desert tortoise or Railroad Valley springfish. However, springs occupied by Railroad Valley springfish occur on private lands, and any landowner activity which degrades these habitats may adversely impact their suitability for continued use by this fish.

Biological Opinion

It is our Biological Opinion that implementation of the Bureau's Tonopah RMP, as presented in the preliminary final proposed version of the document, is not likely to jeopardize the continued existence of the threatened desert tortoise or the threatened Railroad Valley springfish, or result in the destruction or adverse modification of Railroad Valley springfish critical habitat.

Incidental Take

Sections 4(d) and 9 of the Act prohibit taking (harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in such conduct) of listed species of fish and wildlife without a special exemption. "Harm" is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering (50 CFR § 17.3). "Harass" is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding, or sheltering (50 CFR § 17.3). Under the terms of sections 7(b)(4) and 7(o)(2), taking that is incidental to and not intended as part of the agency action is not considered prohibited taking provided that such taking is in compliance with this Biological Opinion. The Bureau has a continuing duty to regulate the activity that is covered by this incidental take statement.

The Service does not anticipate that implementation of the proposed Tonopah RMP will result in incidental take of desert tortoise or Railroad Valley springfish; therefore, none is authorized by this incidental take statement. Incidental take of desert tortoise by implementation of the Bureau's livestock grazing program has been authorized under a previous biological opinion. The Bureau will request consultation

with the Service for all individual actions which the Bureau determines are likely to adversely affect any listed species. At that time, the specific action will be evaluated and incidental take authorized as appropriate.

Conservation Recommendations

Section 7(a)(1) of the Act directs Federal agencies to use their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species. The term "conservation recommendations" has been defined as Service suggestions regarding discretionary Federal agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, or regarding the development of information.

1. The Bureau should coordinate all oil and gas leasing activities within Railroad Valley between the Egan District and the Battle Mountain District.

2. The Bureau should monitor the discharge of Railroad Valley springs on public lands.

3. The Bureau should restrict the construction of oil and gas field access roads or pipeline near open water to avoid accidental contamination due spillage.

4. The Bureau should prohibit underground detonations during seismic exploration in Railroad Valley.

In order for the Service to be kept informed of actions that either minimize or avoid adverse effects, or that benefit listed species or their habitats, the Service requests notification of the implementation of any conservation recommendations.

Reinitiation Requirement

This concludes formal consultation on the Bureau's preliminary final proposed Tonopah RMP. As required by 50 CFR § 402.16, reinitiation of formal consultation is required if: (1) The amount or extent of incidental take is exceeded; (2) new information reveals effects of the Federal agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this Biological Opinion; (3) the Federal agency action is subsequently modified in a

manner that causes an effect to the listed species or critical habitat that was not considered in this Biological Opinion; (4) a new species is listed or critical habitat designated that may be affected by the action.

We appreciate the assistance and cooperation of your staff throughout this consultation process. The preliminary final proposed Tonopah RMP and Environmental Impact Statement was well prepared and adequately addressed sensitive species of concern. We appreciate the attention given to preserving and enhancing the status of species identified as candidates for listing as threatened or endangered under the Act. If we can be of any further assistance, please contact Donna Withers or me at (702) 784-5227.

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cc:
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GLOSSARY INCLUDING ACRONYMS

Accelerated Erosion	Much more rapid than normal, natural, or geologic erosion, primarily as a result of the influence of the activities of man or, in some cases, of animals or natural catastrophies that expose bare surface, for example, fires.
Area of Critical Environmental Concern	ACEC. Places within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources, other natural systems or processes or to protect life and safety from natural hazards.
Allotment Categorization	The grazing management program has assigned priorities to management efforts using a selective management approach. Under this approach, grazing allotments are categorized into "I", "M", and "C" management categories. The objectives for these categories are to: 1) Improve (I) current unsatisfactory conditions; 2) Maintain (M) current satisfactory conditions; or 3) Manage custodially (C) while protecting existing resource values. Proposed actions for managing allotments within each category are designed to meet these objectives.
Allotment	An area of land designated and managed for grazing of livestock.
AML	Appropriate Management Level. The maximum number of wild horses and/or burros to be managed for in a herd management area. The Population number has been set through evaluation of monitoring data.
AMP	Allotment Management Plan. A documented program which prescribes the manner in which livestock operations will be conducted to meet multiple-use sustained yield, economic and other objectives.
APD	Application for permit to drill. A written application for the purpose of drilling for oil and gas.

Appropriative Water Right	The right to use water in accordance with the appropriation doctrine obtained by making application under State law and administrative claims procedures.
ARPA	Archaeological Resources Protection Act of 1979. The purpose of this Act is to secure, for the present and future benefit of the American people, the protection of archeological resources and sites which are on public lands and Indian lands and to foster increased cooperation and exchange of information between governmental authorities, the professional archeological community, and private individuals having collections of archeological resources and data which were obtained before the date of this Act.
AUM	Animal Unit Month. The amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month.
Bajada	A broad, continuous alluvial slope or gently inclined detrital surface extending from the base of mountain ranges out into and around an inland basin, formed by the lateral coalescence of a series of separate but confluent alluvial fans, and having an undulating character due to the convexities of the component fans. It occurs most commonly in semiarid and desert regions, as in the southwest U.S.
BOPD	Barrels of oil per day.
"C" Category	A grazing allotment category where the objective is to Custodially manage the existing resource values.
Candidate Species	System of categorization provided by the Endangered Species Act. Category 1 (C1) are plant and animal species for which the U.S. Fish and Wildlife Service has on file substantial information to support a proposal to list as threatened or endangered. Category 2 (C2) are plant and animal species for which current information indicates that a proposal to list as threatened or endangered is possibly appropriate, but for which more information is needed to support a listing proposal.
Carey Act	The Act of August 18, 1894, which enables the Federal government to grant lands to eligible states which may in turn make grants to entrymen who irrigate and reclaim said lands (see 43 U.S.C. 641).

Casual Use	Any short-term non-commercial activity which does not cause appreciable damage or disturbance to the public lands, their resources or improvements, and which is not prohibited by closure of the lands to such activities.
CFR	Code of Federal Regulations.
Charcoal Kiln	An historic structure made of rock or brick in which charcoal is produced through the burning of wood.
Class I Cultural Inventory	An inventory of the existing literature and a profile of the current data base for cultural resources, frequently utilized to guide field inventories.
Class II Cultural Inventory	A sample-oriented field inventory which is representative of the range of cultural resources within a finite study area.
Class III Cultural Inventory	An intensive field inventory designed to locate and record, from surface and exposed profile, all cultural resources within a specified area.
Common Desert Plants	Common desert plants are those plants occurring throughout most of the TRA and/or that are not classified as a special status species.
CRMP	Coordinated Resource Management Planning. Through the CRMP process livestock operators, interested members of the public, organization representatives, and officers of state and federal resource management agencies formulate activity plans for the management of wildlife, wild horses/burros, and livestock.
Cultural Resources	Fragile and non-renewable elements of the environment including archeological remains (evidence of prehistoric or historic human activities) and sociocultural values traditionally held by ethnic groups (sacred places, traditionally utilized raw materials, etc.).
Cultural Resources Property	Any physical evidence of former human presence more than 50 years old. Examples can include anything from a single isolated artifact (stone flak, projectile point, bottle fragment, etc.) to vestiges of an old trail, historic period dump or 19th century mining operation,to a large aboriginal village or historic townsite.

DLE	Desert Land Entry. An entry of irrigable, arid, agricultural public land under the Act of March 3, 1877, which the entryman must reclaim, irrigate and cultivate. An individual may file and receive patent to a maximum of 320 acres [no residency requirement in Nevada].
Ecological Site	A distinctive kind of rangeland that differs from other kinds of rangeland in its ability to produce a characteristic natural plant community. An ecological site is the product of all environmental factors responsible for its development. It is capable of supporting a native plant community typified by an association of species that differs from that of all other ecological sites in kind or production of species or in total production.
Ephemeral Range	Range on which the principal plants are self-perpetuating annual, herbaceous species.
ERMA	Extensive Recreation Management Area. The portion of the resource area which is not within an SRMA. ERMAs are areas where recreation is dispersed and unstructured and where minimal recreation related investments are required.
Erosion	The wearing away of the land surface by running water, wind, ice, or other geological agents, including such processes as gravitational creep.
ESA	Endangered Species Act of 1973 (as amended). Federal laws to ensure that no federal action will jeopardize the continued existence of federally listed or proposed threatened or endangered species of plant or animal.
Experimental Stewardship	A program authorized by Section 12 of the Public Rangelands Improvement Act of 1978. The goal of the program is effective resource management by grazing permittees whose stewardship results in improved range conditions.

Fire Intensity Level

An expression of fireline intensity, based on typical flame length of a fire behavior condition, used in the analysis to reflect differences in difficulty of suppression and fire effects on resource output:

Flame Length (feet)	Fire Intensity Level
0 - 2	1
2 - 4	2
4 - 6	3
6 - 8	4
8 - 12	5
12 +	6

FLPMA

Federal Land Policy and Management Act. Public Law 94-579, October 21, 1976. Often referred to as the BLM "Organic Act," which provides the majority of the BLM's legislative authority, direction, policy, and basic management guidance.

Fluid Minerals

Includes both oil and gas and geothermal resources. Established by the Mineral Leasing Act of 1920 and the Geothermal Steam Act of 1970.

FMAP

The approved Battle Mountain Fire Management Activity Plan.

Functional - At Risk

Riparian-wetland areas that are in functional condition but an existing soil, water, or vegetation attribute makes it susceptible to degradation.

Herd Area

The geographic area identified as having provided habitat for a herd of wild horses/burros in 1971.

HMA

Wild Horse/Burro Herd Management Area. Geographic units within herd areas which are managed for wild horses and burros.

HMAP

Herd Management Area Plan. A plan for management of wild horses/burros in a geographical unit.

HMP

Habitat Management Plans. Activity level plans for wildlife habitat management. They are written in coordination with other resource plans and in accordance with the RMP.

"I" Category	A grazing allotment category where the objective is to improve the current resource condition.
IMP	Interim Management Policy and Guidelines. Guidelines for managing Wilderness Study Areas so as not to impair their suitability for preservation as wilderness until the decision is made to designate an area as wilderness or to release it for multiple use purposes.
Interdisciplinary Approach	Cooperative, interactive consultation and analysis among individuals representing two or more disciplines to "insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making, which may have an impact on man's environment" [NEPA 102(2)(A)].
Interim Herd Size	The interim herd size for wild horses and/or burros is the AML until modified or adjusted by monitoring and evaluation.
Issue	A concern or controversy about existing and potential resource allocations, levels of resource use, production and protection, and related management practices.
KGRA	Known Geothermal Resource Area. Lands that have known value for geothermal resources.
Livestock	Domestic livestock including cattle, sheep, horses, burros and goats. In the Tonopah Resource Area cattle, sheep, and horses are the only domestic livestock licensed.
Livestock Carrying Capacity	The maximum stocking rate possible without inducing damage to vegetation or related resources.
Locatable Minerals	Any valuable mineral that is not salable or leasable including gold, silver, molybdenum, tungsten, uranium, etc.
Long Term Monitoring	Includes "(1) frequency, (2) percent composition by weight of the vegetation, (3) key forage plant utilization, (4) resource value ratings, (5) photography (photo plots), and (6) evaluation of permanent exclosures."

"M" Category	A grazing allotment category where the objective is to maintain the current resource condition.
MFP	Management Framework Plan. A planning decision document prepared before the effective date of the regulations implementing the land use planning provisions of FLPMA.
Mineral Materials	Common varieties of sand, building stone, gravel, clay, moss rock, etc., obtainable under the Mineral Act of 1947, as amended.
MLRA	Major Land Resource Areas. An SCS method for classifying areas suitable for potential uses.
MMBO	Million barrels of oil.
Monitoring	The orderly collection and analysis of data to evaluate progress in meeting resource management objectives.
Multiple Use	Management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.
NDOT	State of Nevada Department of Transportation.

NDOW	State of Nevada Division of Wildlife.
NEPA	National Environmental Policy Act of 1969. A law enacted on January 1, 1970 that established a national policy to maintain conditions under which man and nature can exist in productive harmony and fulfill the social, economic and other requirements of present and future generations of Americans. It established the Council on Environmental Quality for coordinating environmental matters at the federal level and to serve as advisor to the President on such matters. The law made all federal actions and proposals which could have a significant impact on the environment subject to review by federal, state and local environmental authorities.
NHPA	National Historic Preservation Act of 1966. The Act establishes the Advisory Council on Historic preservation and State Historic Preservation officers.
National Natural Landmark Register	A program which seeks to identify and encourage the preservation of areas that illustrate the ecological and geological character of the United States.
NOI	Notice of Intent. A notice printed in the Federal Register announcing that the agency is going to prepare an RMP and/or EIS.
Non-Energy Leasable Minerals	Solid minerals such as phosphate, sodium and potassium which may be acquired under the Mineral Leasing Act of 1920, as amended.
Non Functional	Riparian-wetland areas that clearly are not providing adequate vegetation, landform, or large woody debris to dissipate stream energy associated with high flows and thus not reducing erosion, improving water quality, etc. as listed in the definition of proper functioning condition. The absence of certain physical attributes such as floodplain where one should be are indicators of non functioning conditions.
NSO	No Surface Occupancy. A fluid minerals leasing stipulation that prohibits occupancy or disturbance on all or part of the lease surface in order to protect special values.

OHV	Off-Highway Vehicles. Any motorized vehicle designed for cross-country travel over any type of natural terrain.
OHV Designations	Open: An area where all types of vehicle use is permitted at all times, anywhere in the area subject to operating regulations and vehicle standards set forth in law. Limited: An area restricted at certain times, in certain areas, and/or certain vehicular use. These restrictions may be of any type, but can generally be accommodated within the following type of categories: numbers of vehicles; types of vehicles; time or season of vehicle use; permitted or licensed use only; use on existing roads and trails; use on designated roads and trails; and other restrictions. Closed: An area where off-highway vehicle use is prohibited.
Oil play	The prospective target based on extrapolation of geologic features.
Order 3 Soil Survey	A general soil survey normally conducted by the USDA, Soil Conservation Service, adequate for general planning purposes to determine land use restrictions.
Petroglyph	A figure, design, or indentation carved, abraded, or pecked into a rock surface.
Pictograph	A figure or design painted onto a rock surface.
Plan of Operation	A plan submitted in compliance with 43 CFR 3802 or 43 CFR 3809, by an operator which outlines in detail proposed exploration or mining activities for BLM approval. Can apply to solid leasable minerals or locatable minerals.
Planning Criteria	The constraints and guides for planning purposes as outlined in 43 CFR 1610.4-2. Planning criteria state what will or will not be done during the planning process.
Pluvial Lake bed	A lake bed that was formed during a climatic wet cycle.

PNC	Potential Natural Community: The climax or final vegetation community that emerges after a series of successive vegetational stages. The climax community perpetuates itself indefinitely unless disturbed by outside forces.
Proper Functioning Condition	Riparian-wetland areas are functioning properly when adequate vegetation, landform, or large woody debris is present to dissipate stream energy associated with high water flows, thereby reducing erosion and improving water quality; filter sediment, capture bedload, and aid floodplain development; improve floodwater retention and groundwater recharge; develop root masses that stabilize streambanks against cutting action; develop diverse ponding and channel characteristics to provide the habitat and the water depth, duration, and temperature necessary for fish production, waterfowl breeding, and other uses; and support greater biodiversity. The functioning condition of riparian-wetland areas is a result of interaction among geology, soil, water, and vegetation.
Public Lands	Any land owned by the United States and administered by the Secretary of the Interior through the BLM.
Public Water Reserve	A tract of public land reserved under 43 U.S.C. Section 141 et seq. (Pickett Act) or 43 U.S.C. Section 300 (Stock-Raising and Homestead Act of 1916), containing a spring and/or waterhole, which by law or executive action was withdrawn to preserve the water for certain limited public purposes.
R&PP	Recreation and Public Purposes Act. The Act allows the disposal of public lands to any state, local, Federal or political instrumentality or any non-profit organization for any recreational or public purpose, provided there is no other public land law that is applicable.
RFD	Reasonably Foreseeable Development scenarios. The projection of activities associated with a particular action which can be reasonably foreseen to occur within the near future based on existing trends and economic factors. RFDs are used to provide a base line for impact comparison of alternatives in an economic analysis.

Riparian Area	An area of land directly influenced by permanent water. It has visible vegetation or physical characteristics reflective of permanent water influence. Lakeshores and streambanks are typical riparian areas. Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil.
RMP/EIS	Resource Management Plan/Environmental Impact Statement. A land use plan as described by the FLPMA; combined with a written analysis of the impacts on the environment caused by the plan.
RNA	Research Natural Area. An area which contains natural resource values of scientific interest and is managed primarily for research and educational purposes.
ROD	Record of Decision. a) States what the decisions are. b) Identifies the alternatives considered in reaching the decision and which were considered to be environmentally preferable. c) States whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted.
ROS	Recreation Opportunity Spectrum. A system to identify recreation opportunities available on public lands.
ROW	Right-of-Way. The legal right of use, occupancy, or access across land or water areas for a special purpose or purposes.
SCS	U.S.D.A., Soil Conservation Service.
Section 7 Consultation	Section 7 of the Endangered Species Act requires consultation with the U.S. Fish and Wildlife Service if the habitat of a threatened or endangered plant or animal may be affected by a federally authorized action.
Section 106 Procedure	Refers to Section 106 of the NHPA which requires consideration of historic and cultural resources prior to initiation of proposed BLM authorized activities.

Sensitive Species	Plant and animal species occurring on public lands and requiring special management attention in order to protect them and in order to prevent irreparable damage to the important resources or other natural systems or processes on which it depends. The sensitive list is made up of species listed in category 3c in the Federal Register, Vol. 50 No. 188, September 27, 1985, page 39526.
Short Term Monitoring	Includes "(1) grazing use records, (2) weather information, (3) use maps, and (4) key forage plant utilization using cages for comparison."
SOP	Standard Operating Procedures. Management guidance which applies to, and is part of, the proposed management.
Special Status Species	Wildlife and plant species either federally listed or proposed for listing as endangered or threatened (also see Candidate Species).
SPG	BLM Manual 1620, Supplemental Program Guidance.
SRMA	Special Recreation Management Area. Areas where the presence of high quality natural resources and current or potential demand warrants intensive use practices to protect the area for its scientific, educational and/or recreational values.
Surveillance	Intensive monitoring of areas where human activity is damaging cultural resources. Surveillance may be a scheduled on-site visit, a reconnaissance flight or by observations taken while doing other work.
Trend	The direction of change over time, either toward or away, from desired management objectives.
Unauthorized Use	Any use, occupancy, or development of the public lands, other than casual use, without proper authorization.
Utility Corridors	A parcel of land designated through the land-use planning process as a preferred location for existing and future right-of-way grants. Designation criteria is set forth in Section 503 of FLPMA, 43 CFR 2806.2 and BLM Manual Section 2801.11.
Utilization	The percentage of forage that has been consumed by animals during a time period.

Vegetation Type	A classification of the plant community on a site based on the dominant plant species in the community.
Vested Water Right	A right supported by law that settles the use of water by an individual without contingency; a right complete and consummated, and of such character that it cannot be diverted without the consent of the person to whom the right belongs; it is fixed or established and no longer open to controversy.
VRM	Visual Resource Management. A rating system outlined in BLM Manual 8410 designed for inventorying and managing visual resources.
Wild Horse/Burro	An unbranded and unclaimed horse/burro and it's progeny that has occupied the public lands on or after December 15, 1971, or that uses these lands as all or part of it's habitat.
Withdrawal	Withholding an area of federal land from settlement, sale, location, or entry under some or all of the general land laws for the purpose of limiting activities under those laws to maintain other public values.
WSA	Wilderness Study Area. An area which has been inventoried and found to be wilderness in character as described in Section 603 of the FLPMA and section 2(c) of the Wilderness Act.

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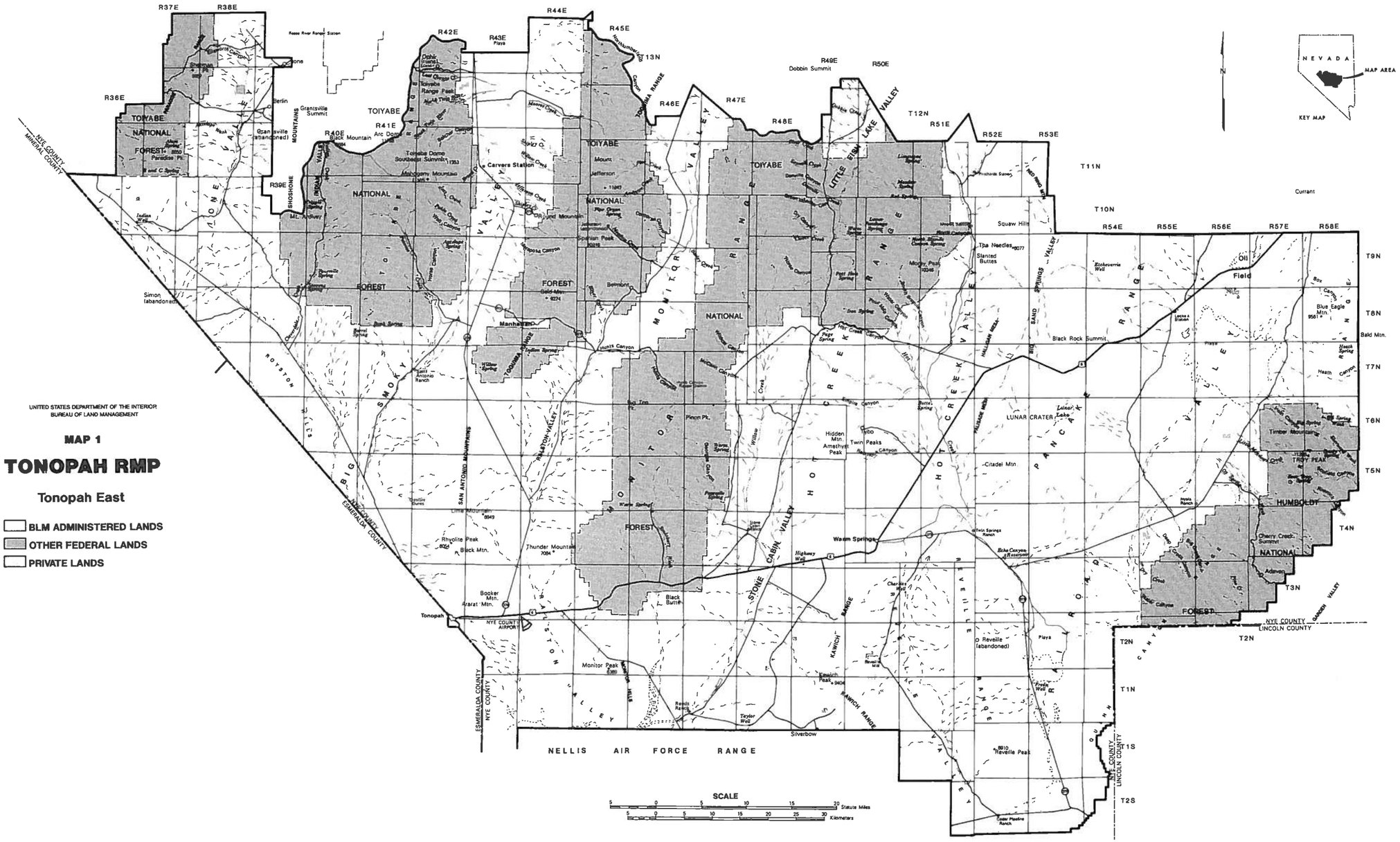


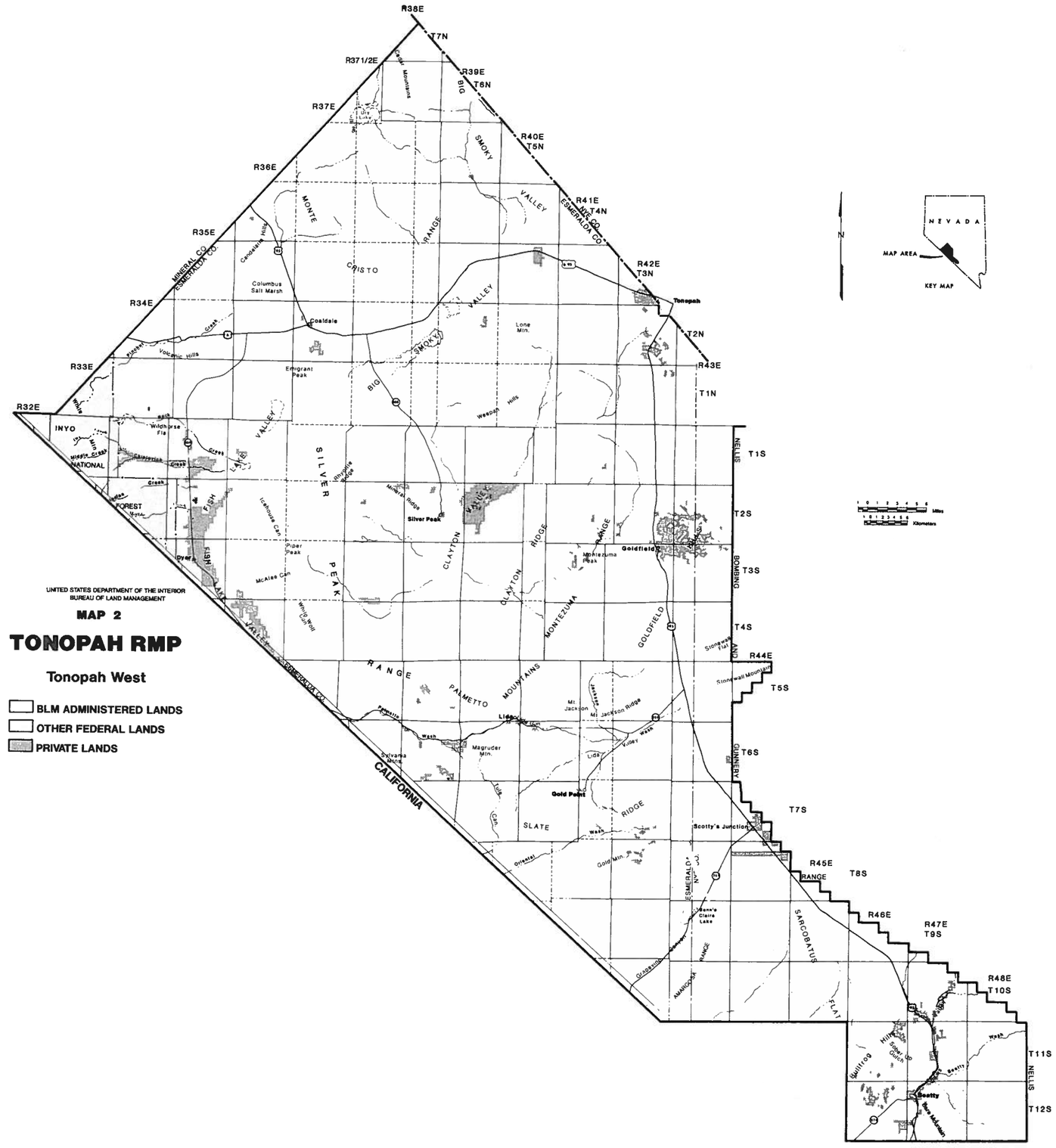
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 1

TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 2
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
NEVADA
MAP AREA
KEY MAP
CALIFORNIA
INYO
NATIONAL
FOREST
MINERAL CO.
ESMERALDA CO.
NYE CO.
NELLIS
BOMBING
GUNNERY
RANGE
Tonopah
Goldfield
Silver Peak
Coaldale
Columbus Salt Marsh
Emigrant Peak
Lone Mtn.
Weepah Hills
Wildhorse Fla
Piper Peak
McAfee Can
Magruder Mtn.
Gold Point
Scotty's Junction
Scotty
Lida
Mt. Jackson
Mt. Jackson Ridge
Montezuma Peak
Gold Mtn.
Sylvania Mtns.
Sonnie Claire Lake
Miles
Kilometers

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 3

TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

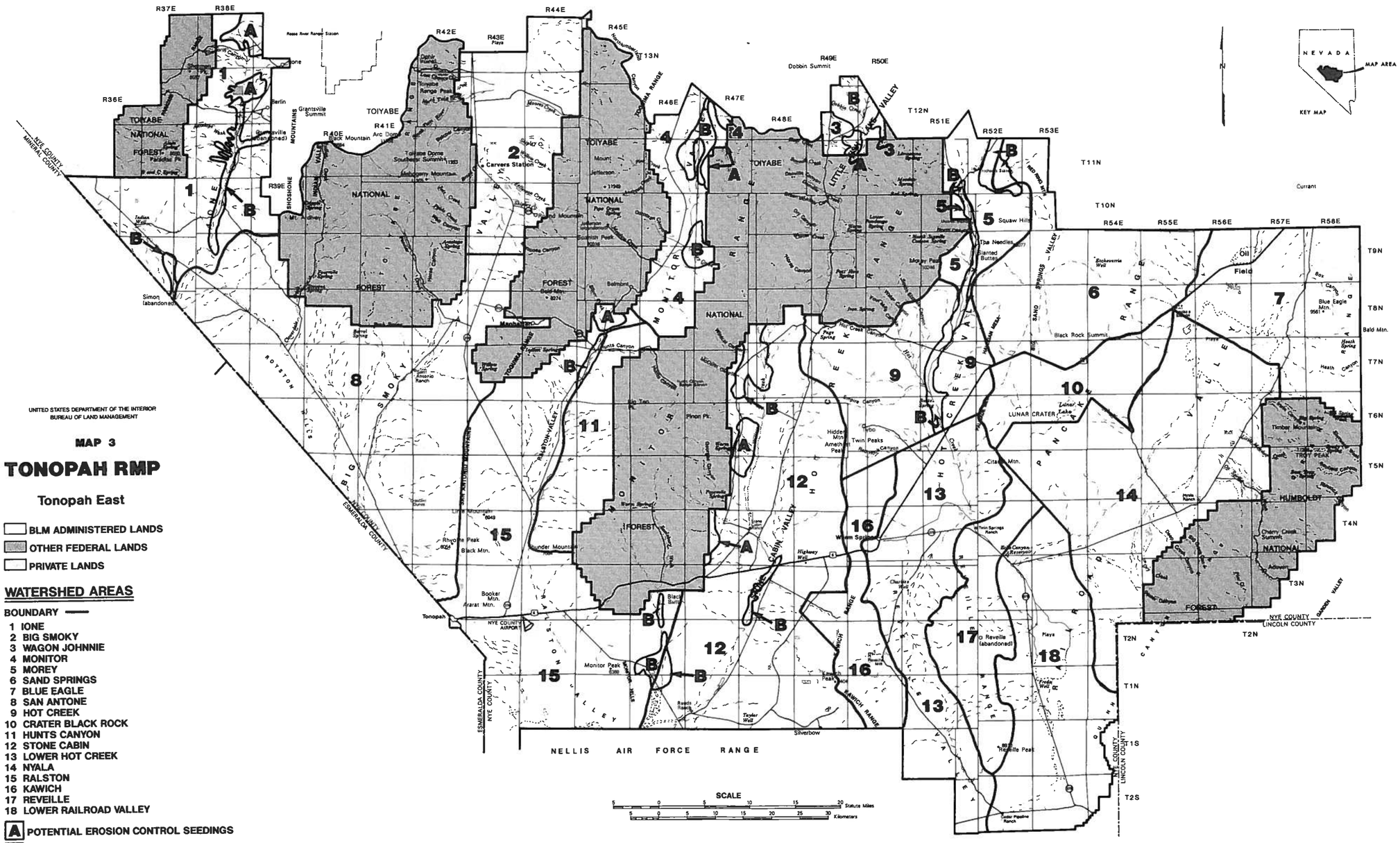
WATERSHED AREAS

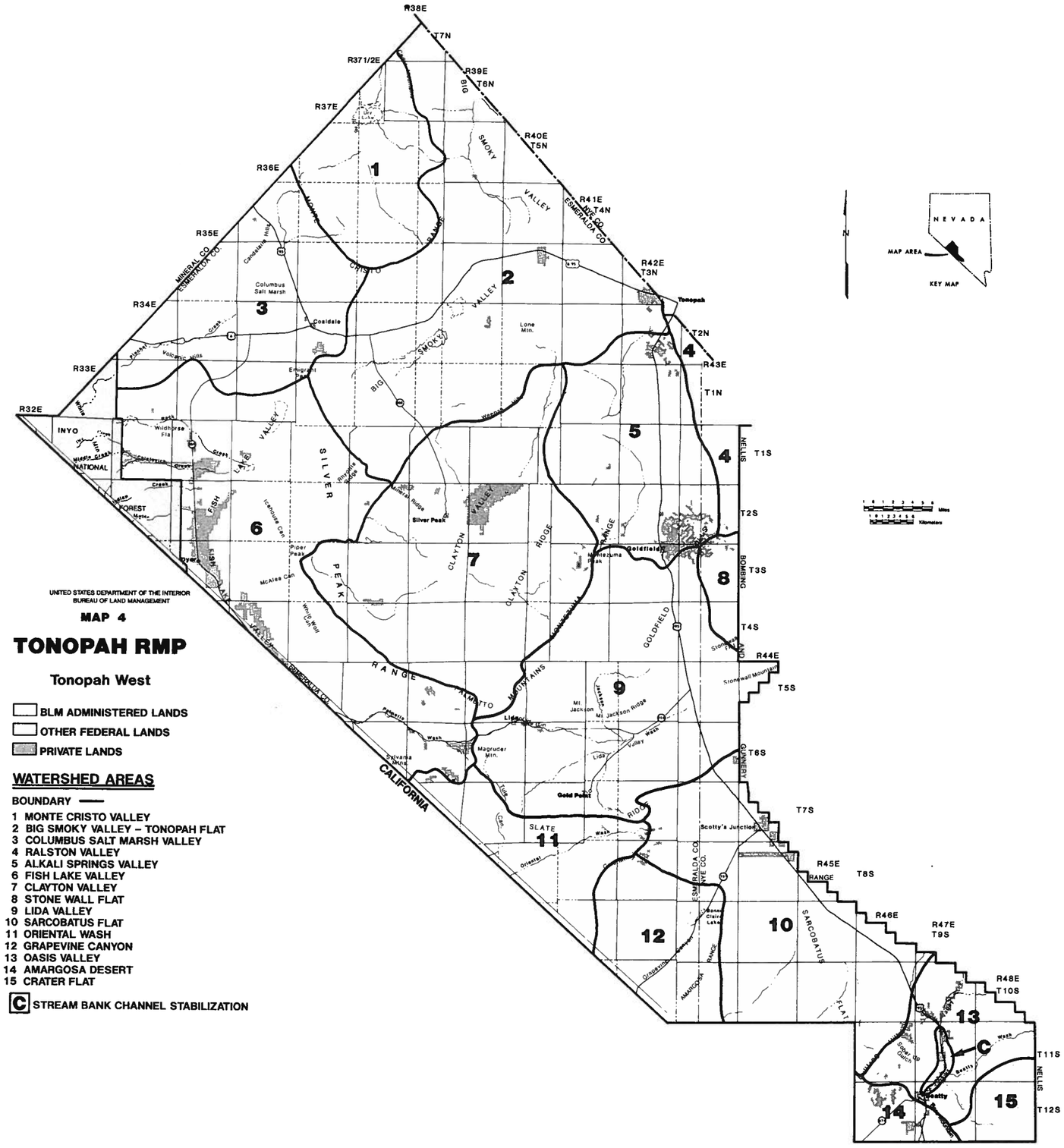
BOUNDARY

1 IONE
2 BIG SMOKY
3 WAGON JOHNNIE
4 MONITOR
5 MOREY
6 SAND SPRINGS
7 BLUE EAGLE
8 SAN ANTONE
9 HOT CREEK
10 CRATER BLACK ROCK
11 HUNTS CANYON
12 STONE CABIN
13 LOWER HOT CREEK
14 NYALA
15 RALSTON
16 KAWICH
17 REVEILLE
18 LOWER RAILROAD VALLEY

A POTENTIAL EROSION CONTROL SEEDINGS

B POTENTIAL EROSION CONTROL SEEDINGS AND STREAM BANK CHANNEL STABILIZATION





UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 4

TONOPAH RMP

Tonopah West

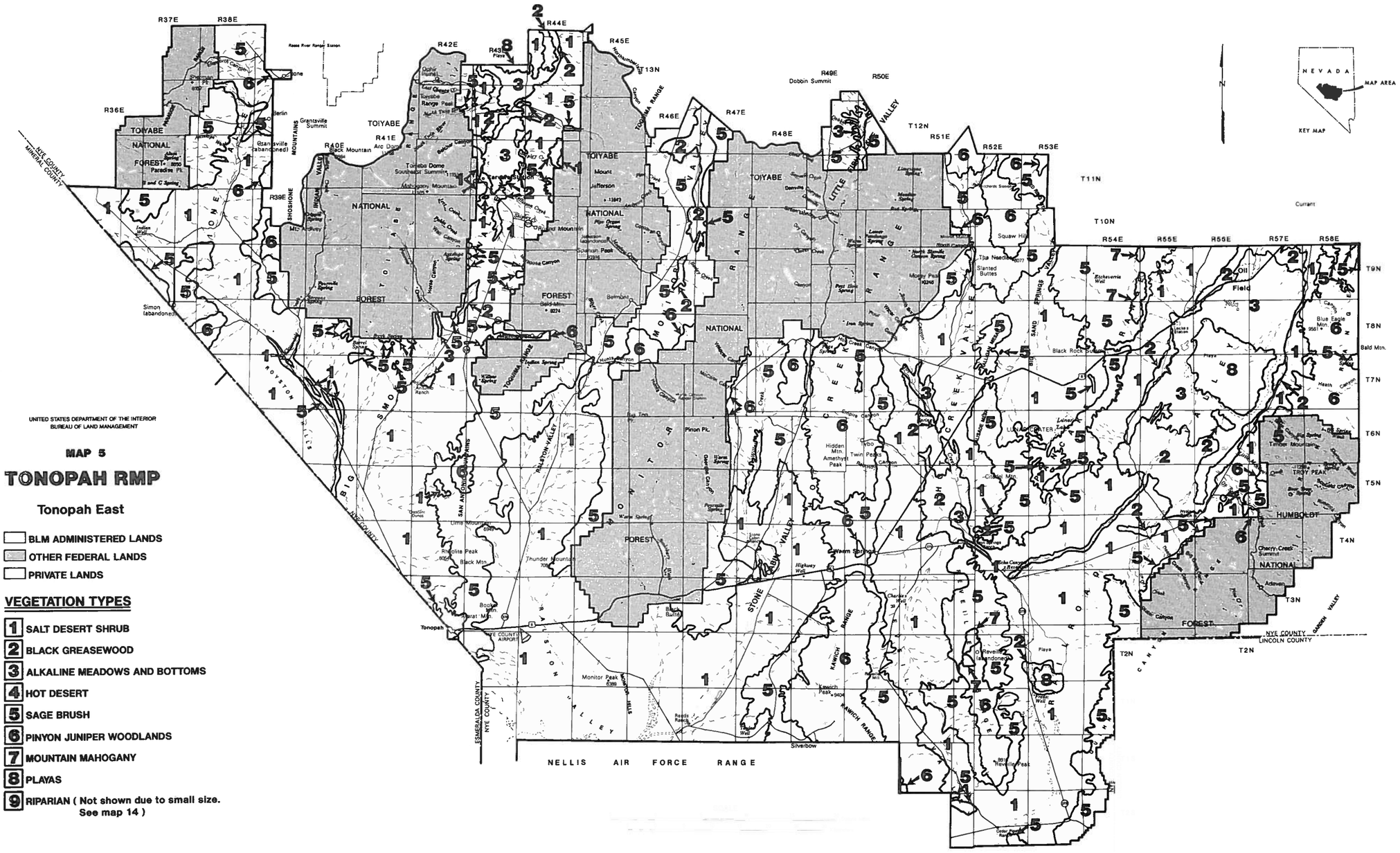
- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

WATERSHED AREAS

BOUNDARY ——

1 MONTE CRISTO VALLEY
2 BIG SMOKY VALLEY – TONOPAH FLAT
3 COLUMBUS SALT MARSH VALLEY
4 RALSTON VALLEY
5 ALKALI SPRINGS VALLEY
6 FISH LAKE VALLEY
7 CLAYTON VALLEY
8 STONE WALL FLAT
9 LIDA VALLEY
10 SARCOBATUS FLAT
11 ORIENTAL WASH
12 GRAPEVINE CANYON
13 OASIS VALLEY
14 AMARGOSA DESERT
15 CRATER FLAT

C STREAM BANK CHANNEL STABILIZATION



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 5

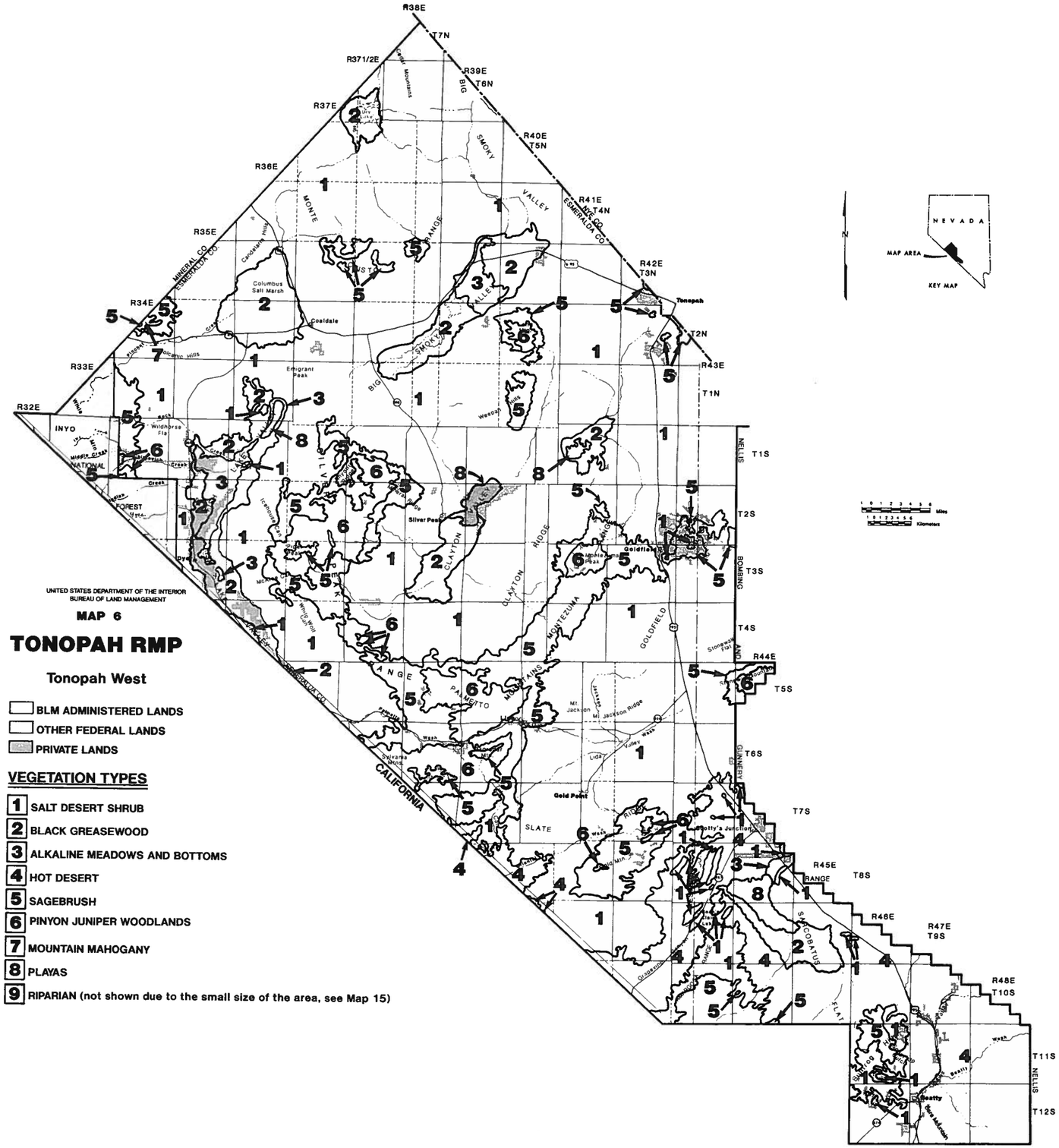
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

VEGETATION TYPES

1. SALT DESERT SHRUB
2. BLACK GREASEWOOD
3. ALKALINE MEADOWS AND BOTTOMS
4. HOT DESERT
5. SAGE BRUSH
6. PINYON JUNIPER WOODLANDS
7. MOUNTAIN MAHOGANY
8. PLAYAS
9. RIPARIAN (Not shown due to small size. See map 14)



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 6

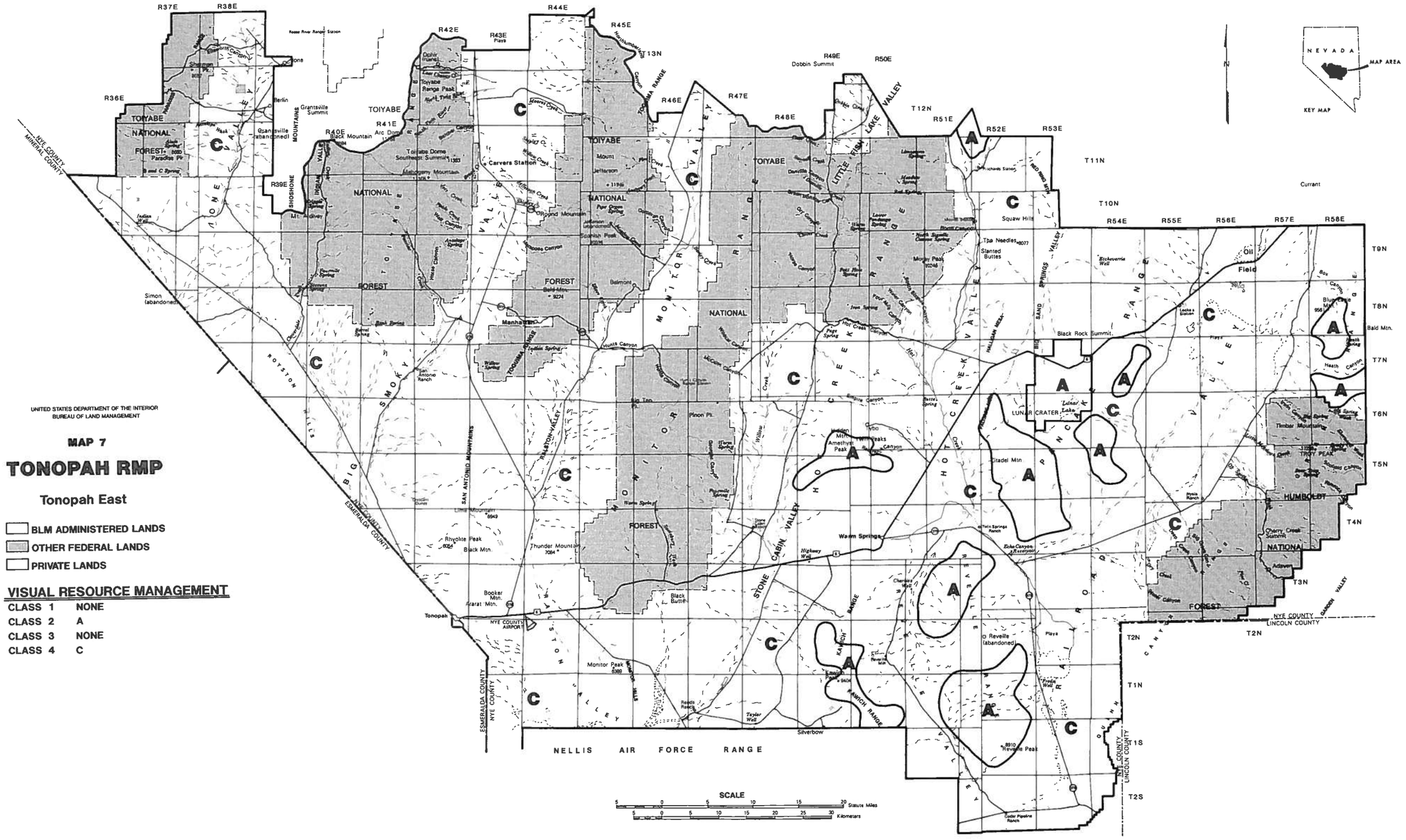
TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

VEGETATION TYPES

1. SALT DESERT SHRUB
2. BLACK GREASEWOOD
3. ALKALINE MEADOWS AND BOTTOMS
4. HOT DESERT
5. SAGEBRUSH
6. PINYON JUNIPER WOODLANDS
7. MOUNTAIN MAHOGANY
8. PLAYAS
9. RIPARIAN (not shown due to the small size of the area, see Map 15)



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 7

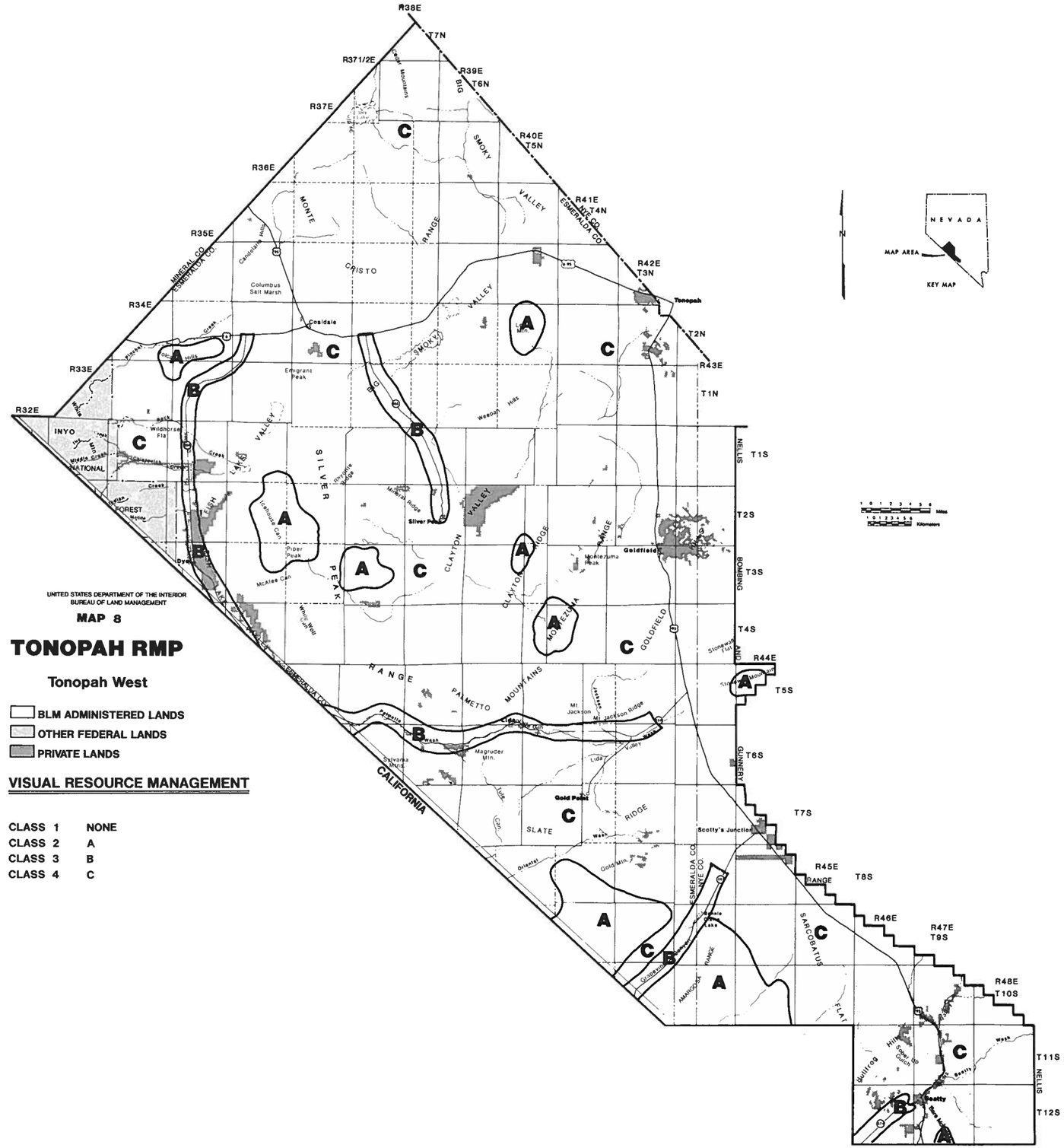
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

VISUAL RESOURCE MANAGEMENT

CLASS 1	NONE
CLASS 2	A
CLASS 3	NONE
CLASS 4	C



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 8

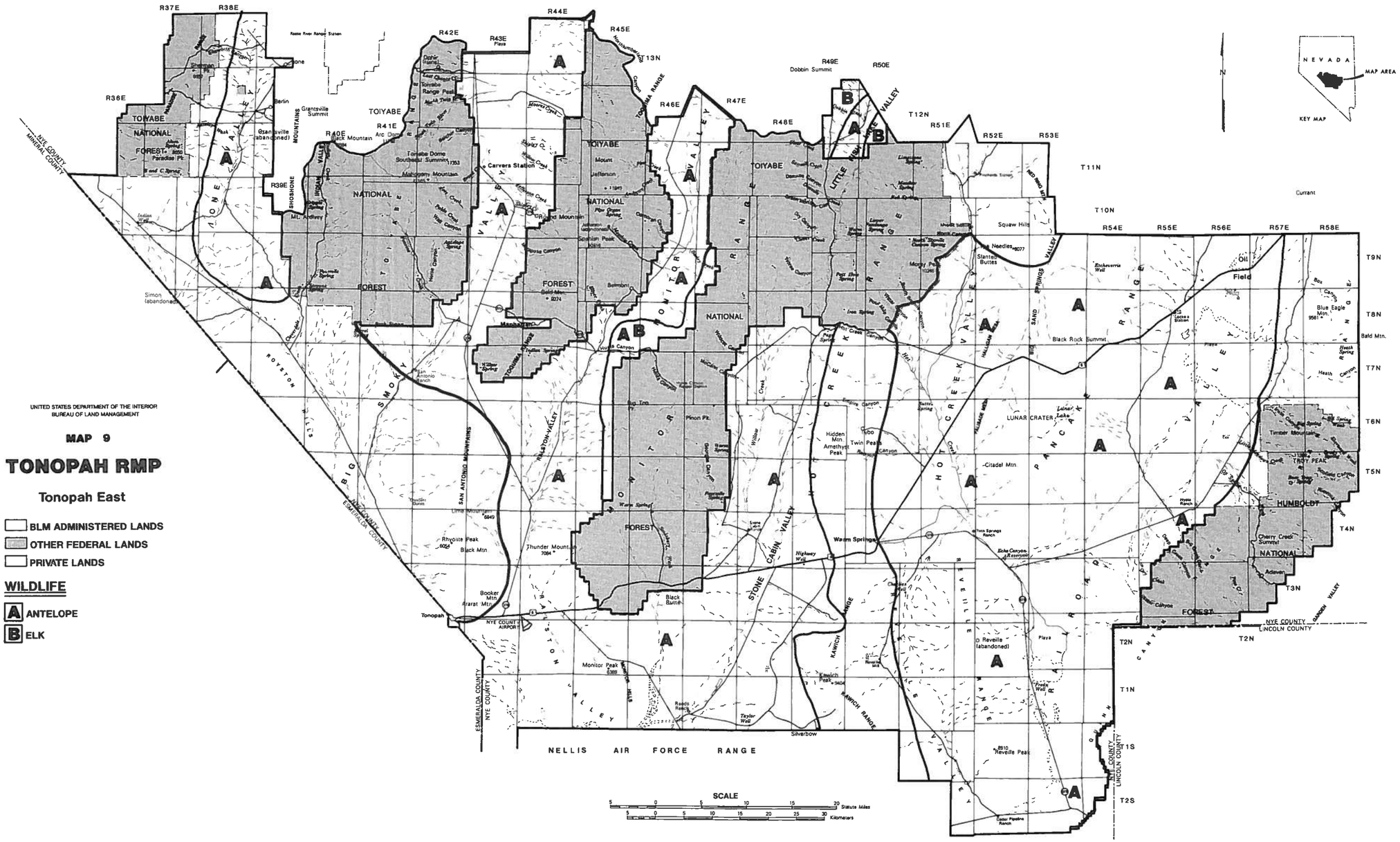
TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

VISUAL RESOURCE MANAGEMENT

CLASS 1	NONE
CLASS 2	A
CLASS 3	B
CLASS 4	C



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 9

TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

WILDLIFE

- A ANTELOPE
- B ELK

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 10

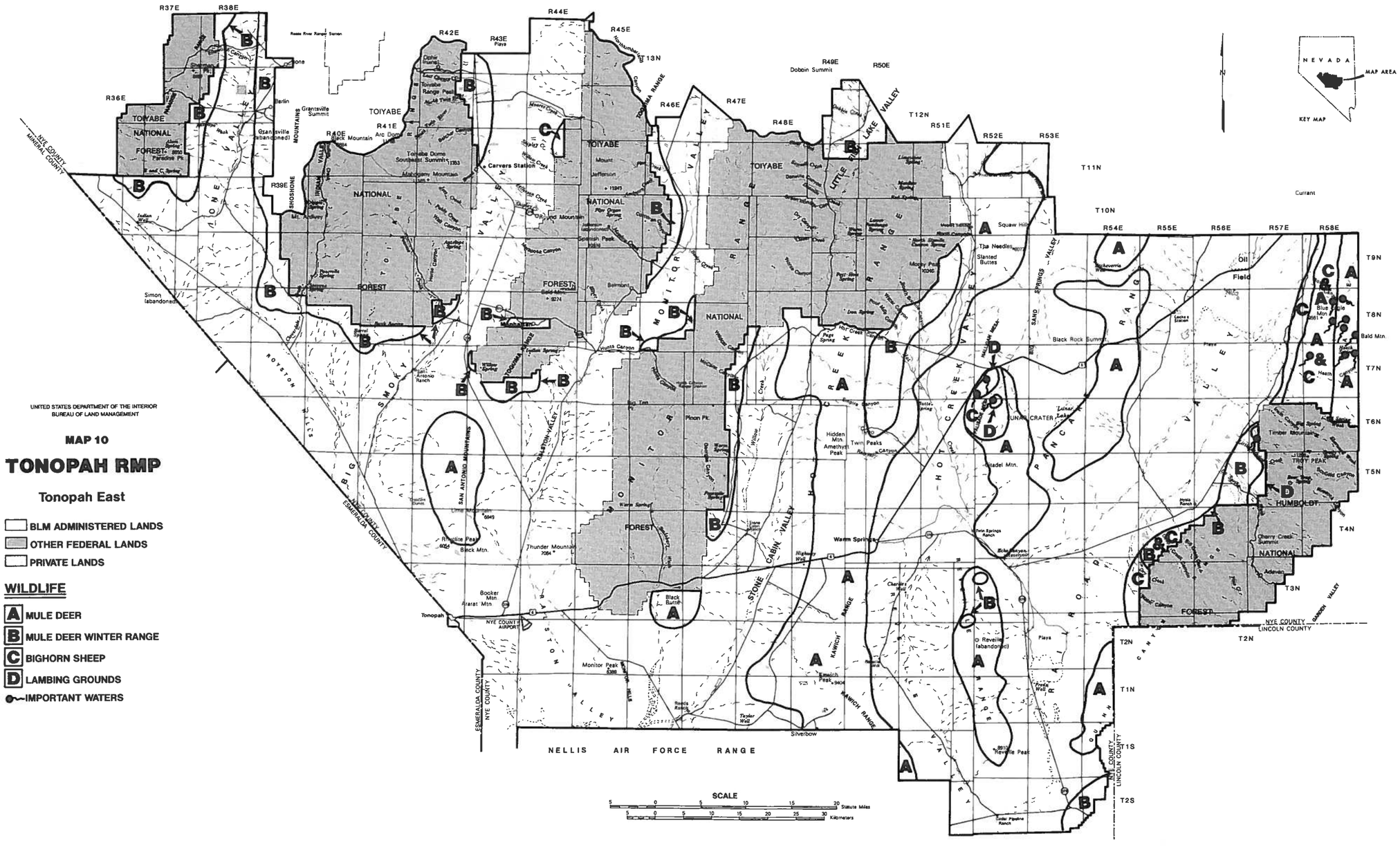
TONOPAH RMP

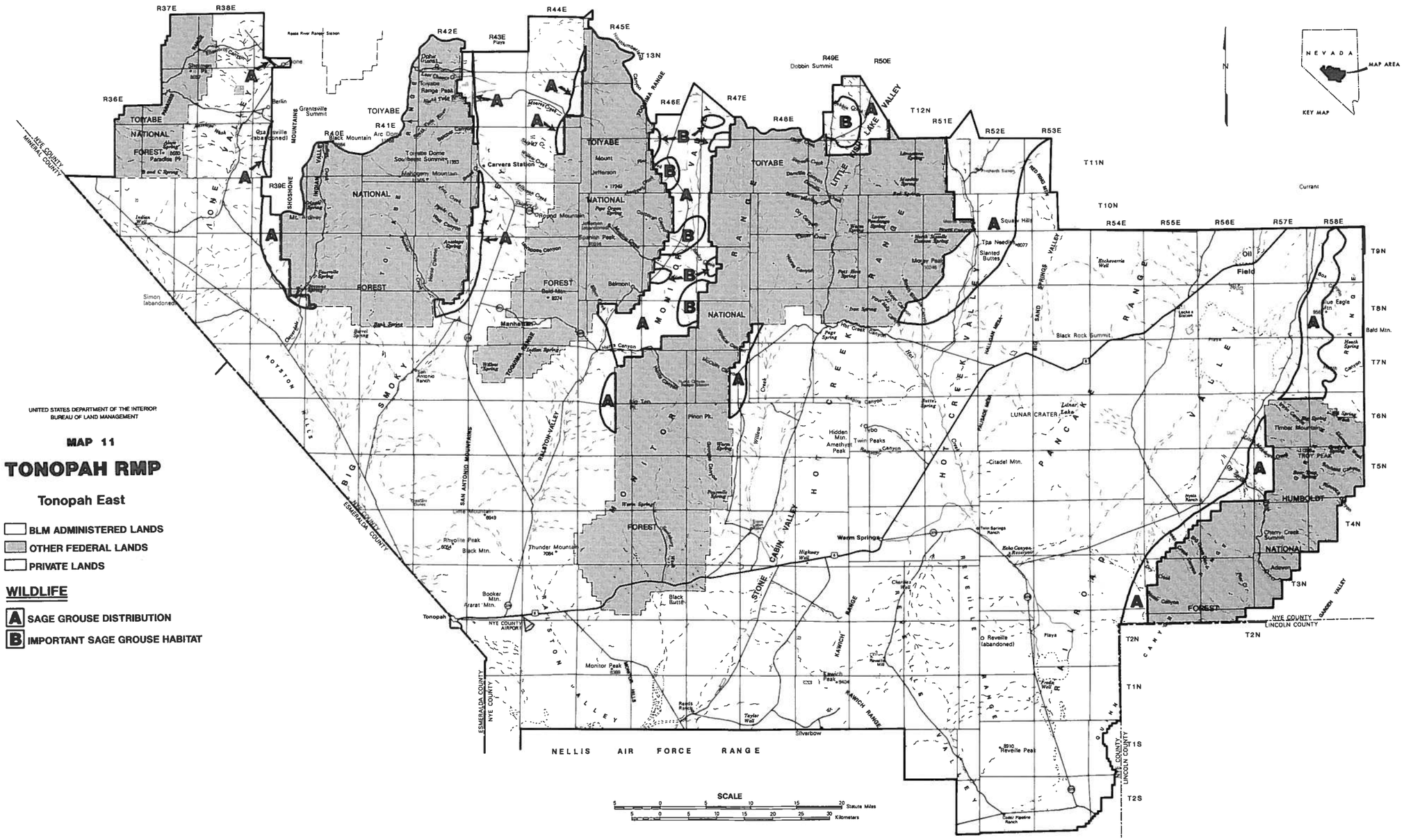
Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

WILDLIFE

- A MULE DEER
- B MULE DEER WINTER RANGE
- C BIGHORN SHEEP
- D LAMBING GROUNDS
- IMPORTANT WATERS





UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 11

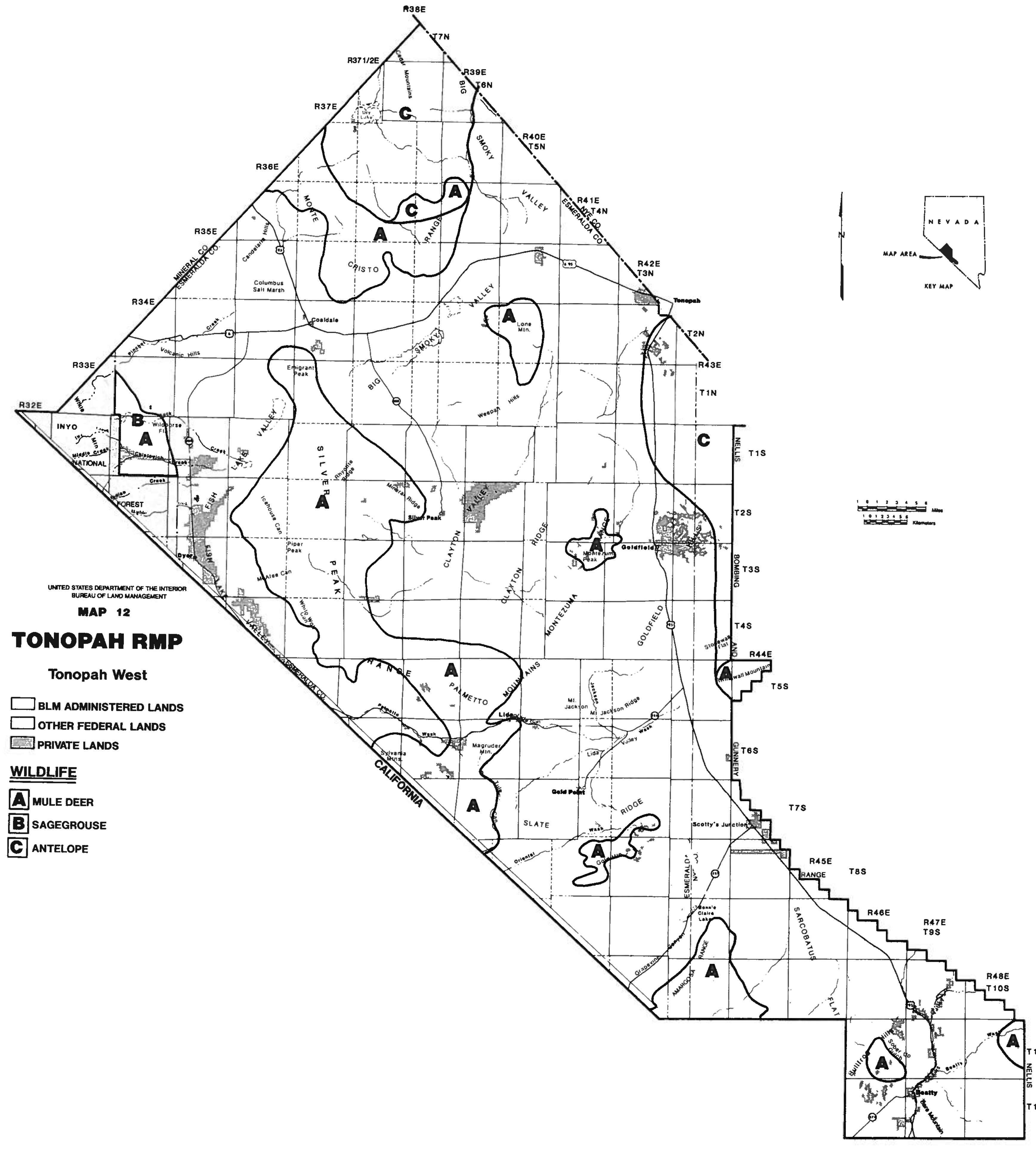
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

WILDLIFE

- A SAGE GROUSE DISTRIBUTION
- B IMPORTANT SAGE GROUSE HABITAT

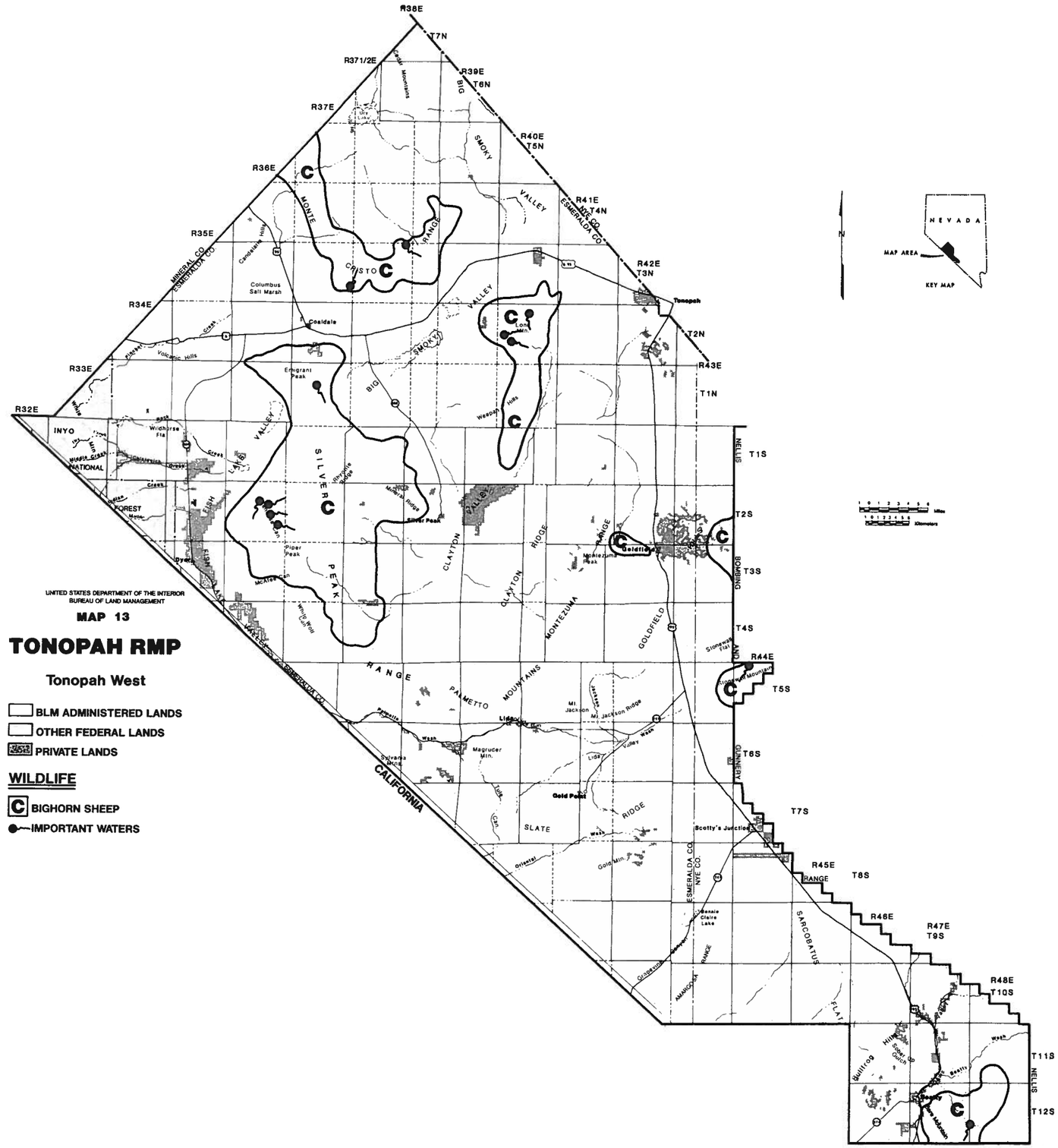


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 12

TONOPAH RMP

Tonopah West


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 13
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
WILDLIFE
BIGHORN SHEEP
IMPORTANT WATERS
R38E
T7N
R371/2E
R39E
T6N
R37E
R40E
T5N
R36E
R41E
T4N
R35E
R42E
T3N
R34E
T2N
R43E
R33E
T1N
R32E
T1S
T2S
T3S
T4S
R44E
T5S
T6S
T7S
R45E
T8S
R46E
R47E
T9S
R48E
T10S
T11S
T12S
NELLIS
BOMBING
RANGE
CALIFORNIA
MINERAL CO.
ESMERALDA CO.
NYE CO.
INYO
NATIONAL
FOREST
BIG SMOKY VALLEY
MONTE CRISTO RANGE
SILVER PEAK RANGE
CLAYTON RIDGE
MONTEZUMA RANGE
GOLDFIELD
PALMETTO MOUNTAINS
SLATE RIDGE
SARCOBATUS FLAT
Columbus Salt Marsh
Coaldale
Emigrant Peak
Silver Peak
Piper Peak
Goldfield
Tonopah
Lida
Gold Point
Scotty's Junction
Magruder Mtn.
Mt. Jackson
Stonewall Flat
Stonewall Mountain
Sarcobatus Flat
Quartz Mountain
Hill Top
Scotty's Junction
Beatty
Amargosa Desert
Oasis Claire Lake
Sylvania Ridge
Mt. Jackson Ridge
Gold Mtn.
Oriental
Wash
Canyon
Valley
Creek
Volcanic Hills
Weepah Hills
Candelaria Hills
Silverado Ridge
Mineral Ridge
Montezuma Peak
Stonewall Flat
Sarcobatus Flat
Amargosa Range
Lone Mtn.
Wildhorse Fla
Magic Circle
Dyer
McAfee Cyn
White Wash
Palmetto
Sylvania Ridge
Oriental
Gold Mtn.
Hill Top
Scotty's Junction
Beatty
Amargosa Desert
Oasis Claire Lake
NEVADA
MAP AREA
KEY MAP
N
Miles
Kilometers

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 14

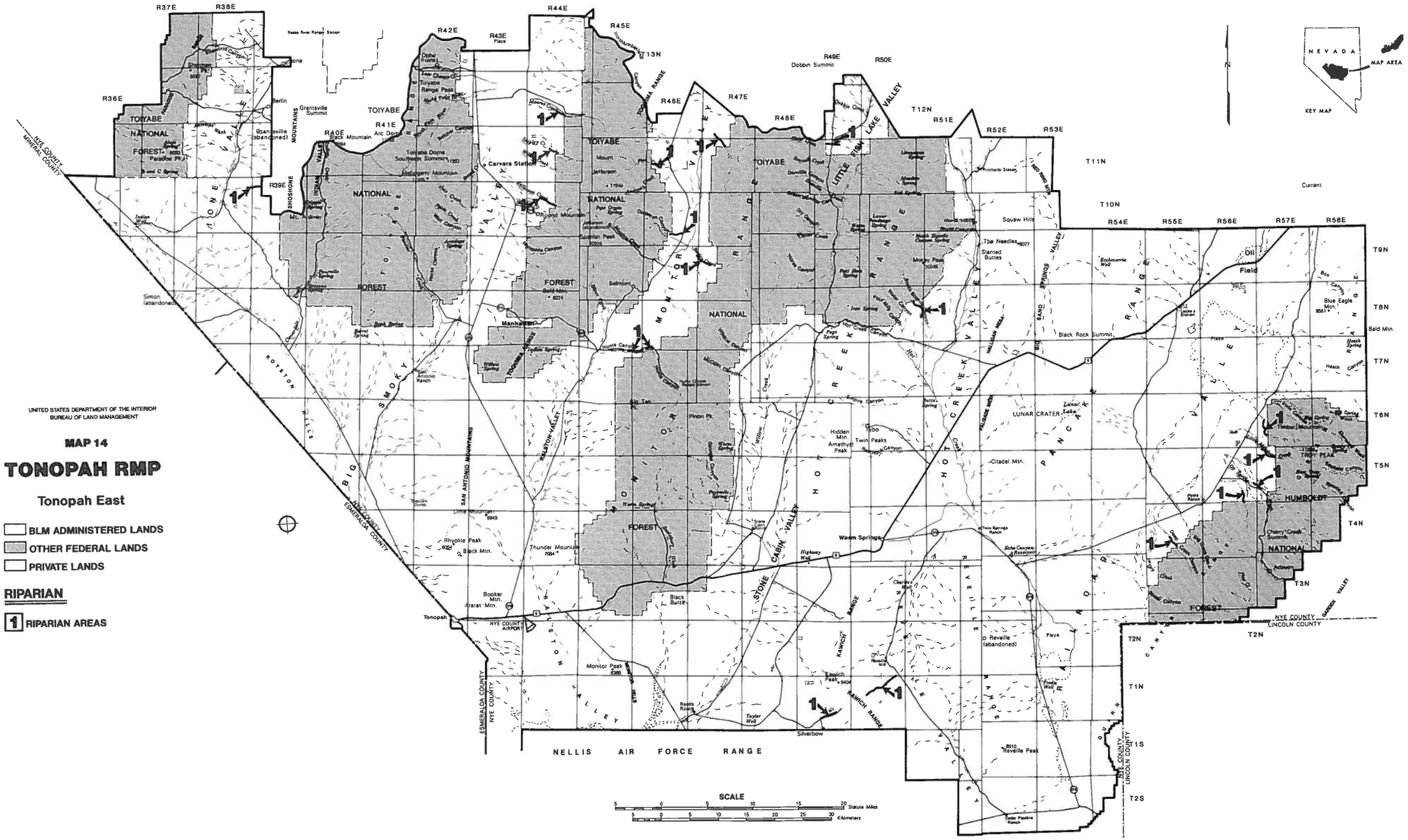
TONOPAH RMP

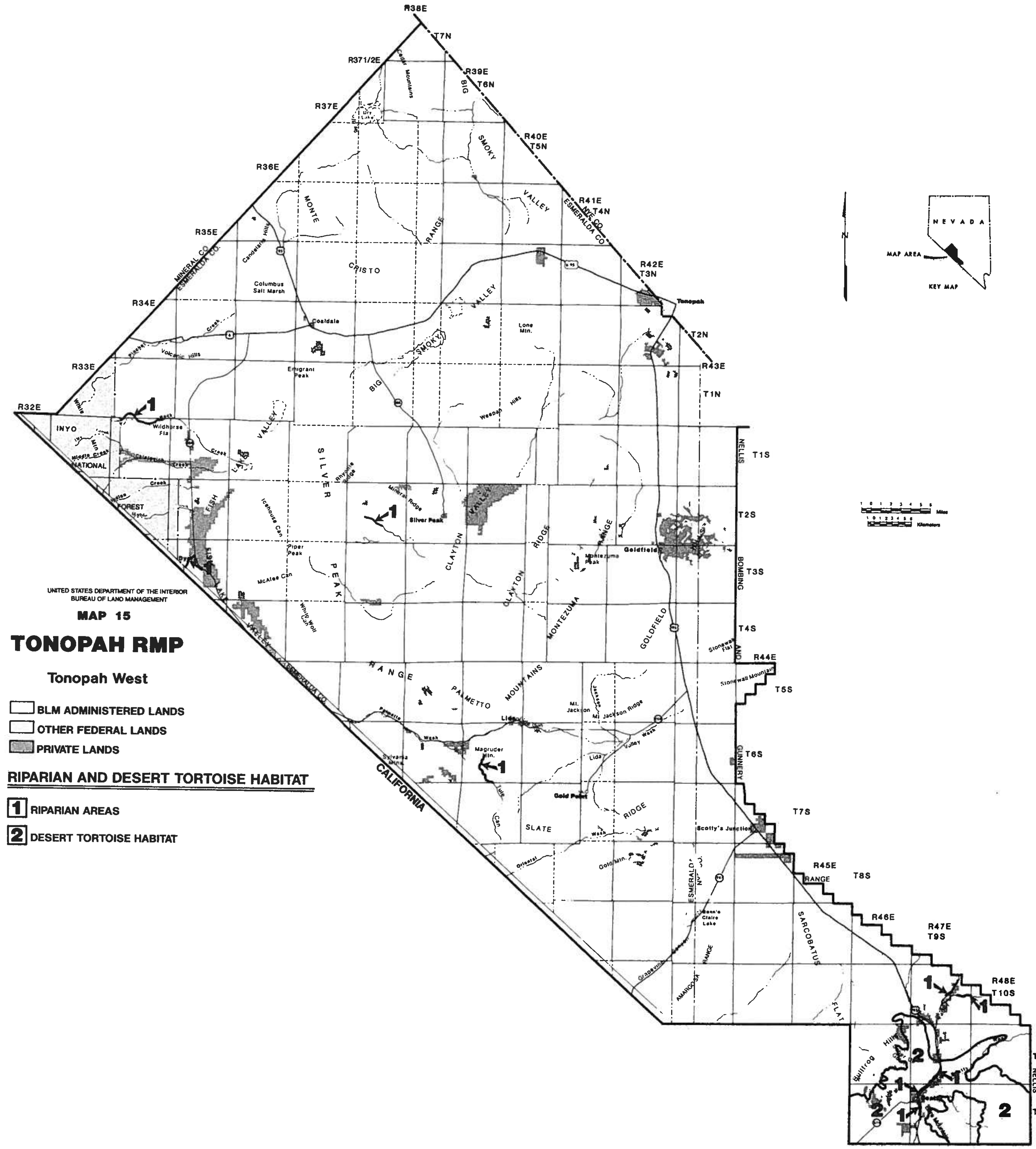
Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

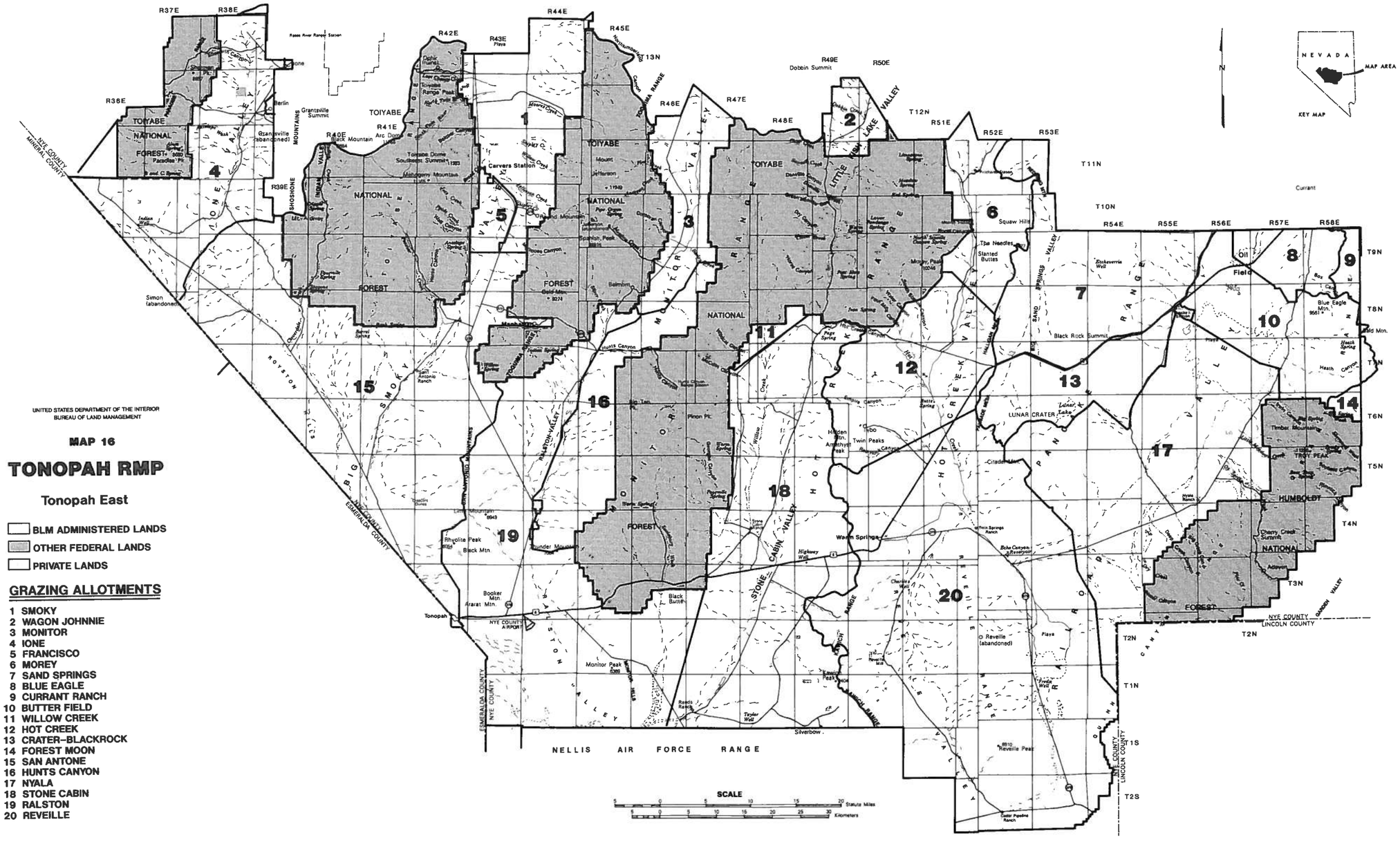
RIPARIAN

1 RIPARIAN AREAS





UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 15
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
RIPARIAN AND DESERT TORTOISE HABITAT
1 RIPARIAN AREAS
2 DESERT TORTOISE HABITAT
NEVADA
MAP AREA
KEY MAP
Miles
Kilometers
R32E
R33E
R34E
R35E
R36E
R37E
R371/2E
R38E
R39E
R40E
R41E
R42E
R43E
R44E
R45E
R46E
R47E
R48E
T7N
T6N
T5N
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
MINERAL CO.
ESMERALDA CO.
NYE CO.
CALIFORNIA
INYO NATIONAL FOREST
NELLIS BOMBING AND GUNNERY RANGE
Tonopah
Coaldale
Columbus Salt Marsh
Candelaria Hills
Cedar Mountains
Dry Lake
MONTE CRISTO RANGE
BIG SMOKY VALLEY
Lone Mtn.
Weepah Hills
Emigrant Peak
Volcanic Hills
Wildhorse Flat
FISH LAKE VALLEY
SILVER PEAK RANGE
Silver Peak
Mineral Ridge
Rhyolite Ridge
Icehouse Can
Piper Peak
McAfee Can
CLAYTON VALLEY
CLAYTON RIDGE
MONTEZUMA RANGE
Montezuma Peak
Goldfield
GOLDFIELD HILLS
Stonewall Flat
Stonewall Mountain
PALMETTO MOUNTAINS
Palmetto Wash
Lida
Lida Valley Wash
Mt. Jackson
Mt. Jackson Ridge
Magruder Mtn.
Sylvania Mtns.
Tule Can
Gold Point
SLATE RIDGE
Gold Mtn.
Oriental Wash
Scotty's Junction
SARCOBATUS FLAT
AMARGOSA RANGE
Grapevine Canyon
Bonnie Claire Lake
Bullfrog Hills



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 16

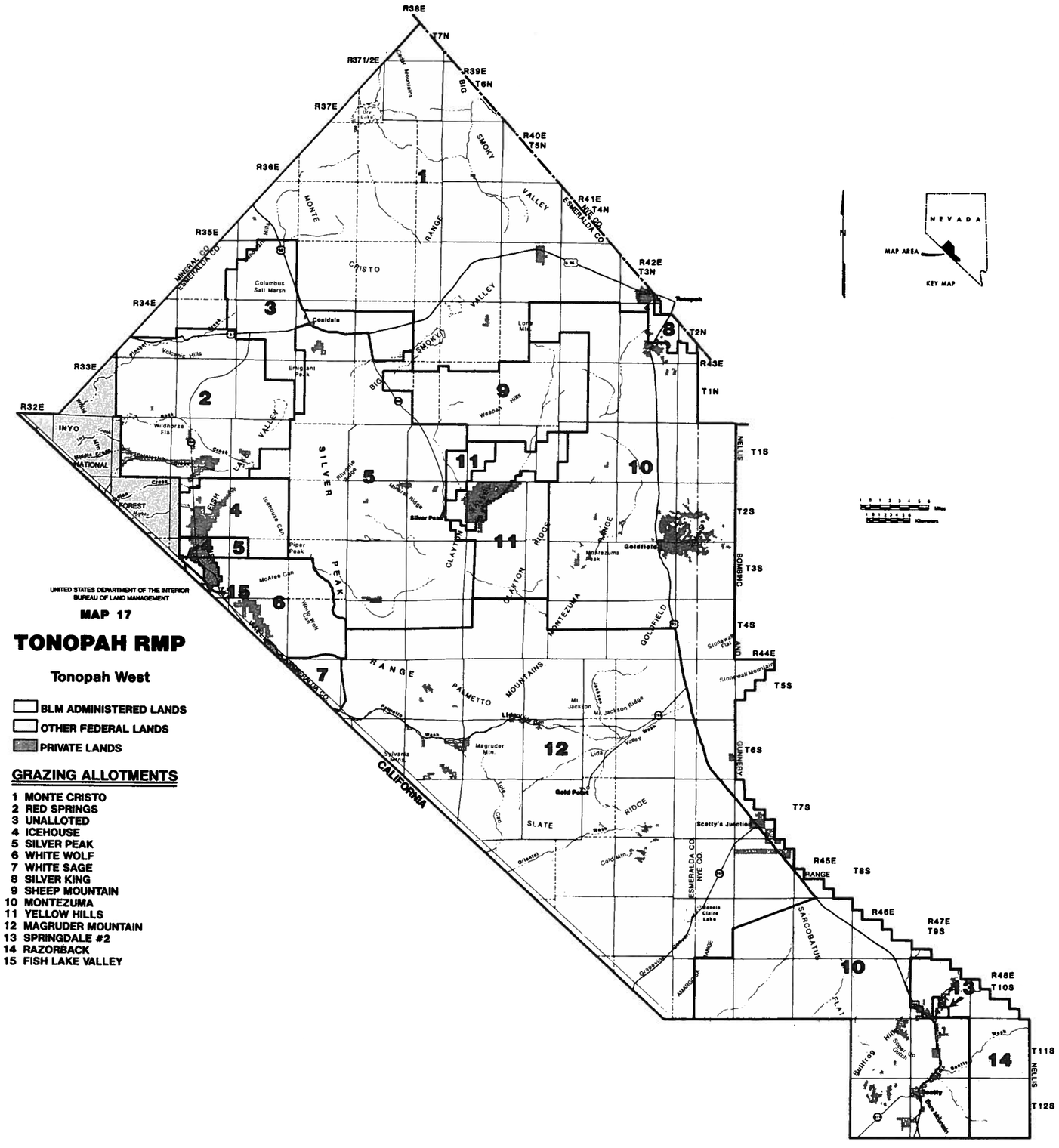
TONOPAH RMP

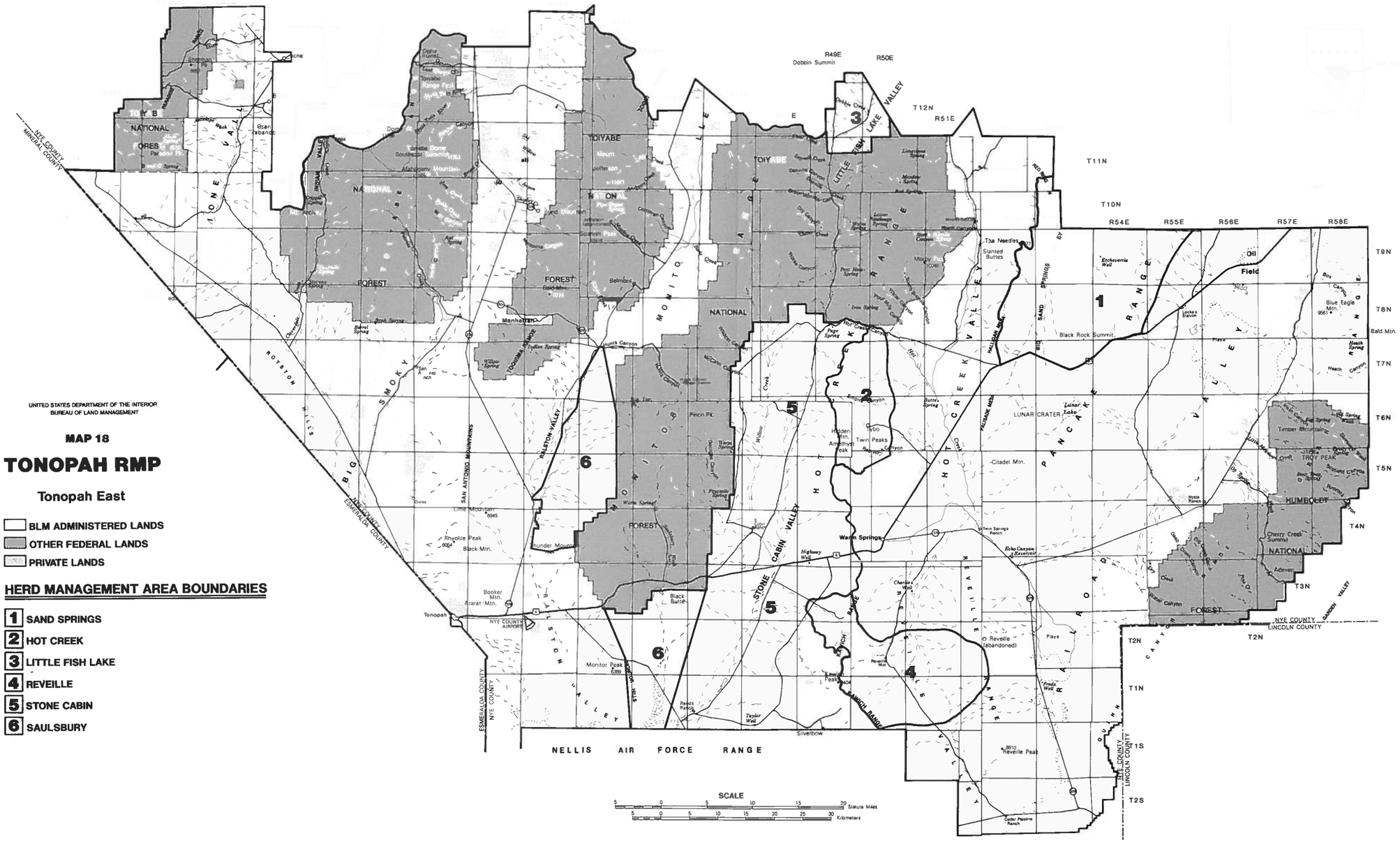
Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

GRAZING ALLOTMENTS

1 SMOKY
2 WAGON JOHNNIE
3 MONITOR
4 IONE
5 FRANCISCO
6 MOREY
7 SAND SPRINGS
8 BLUE EAGLE
9 CURRANT RANCH
10 BUTTER FIELD
11 WILLOW CREEK
12 HOT CREEK
13 CRATER–BLACKROCK
14 FOREST MOON
15 SAN ANTONE
16 HUNTS CANYON
17 NYALA
18 STONE CABIN
19 RALSTON
20 REVEILLE


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 17
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
GRAZING ALLOTMENTS
1 MONTE CRISTO
2 RED SPRINGS
3 UNALLOTED
4 ICEHOUSE
5 SILVER PEAK
6 WHITE WOLF
7 WHITE SAGE
8 SILVER KING
9 SHEEP MOUNTAIN
10 MONTEZUMA
11 YELLOW HILLS
12 MAGRUDER MOUNTAIN
13 SPRINGDALE #2
14 RAZORBACK
15 FISH LAKE VALLEY
NEVADA
MAP AREA
KEY MAP
N
R36E
T7N
R37 1/2E
R39E
T6N
R37E
R40E
T5N
R36E
R41E
T4N
R35E
R42E
T3N
R34E
R43E
T2N
R33E
T1N
R32E
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R44E
R45E
R46E
R47E
R48E
MINERAL CO.
ESMERALDA CO.
NYE CO.
CALIFORNIA
INYO
NATIONAL
FOREST
BIG SMOKY VALLEY
MONTE CRISTO RANGE
SILVER PEAK RANGE
CLAYTON RIDGE
MONTEZUMA RANGE
GOLDFIELD
PALMETTO MOUNTAINS
SLATE RIDGE
SARCOBATUS FLAT
Columbus Salt Marsh
Coaldale
Tonopah
Silver Peak
Goldfield
Lida
Gold Point
Scotty's Junction
Beatty
Stonewall Mountain
Stonewall Flat
Magruder Mtn.
Mt. Jackson
Mt. Jackson Ridge
Montezuma Peak
Piper Peak
Emigrant Peak
Wildhorse Flat
Volcanic Hills
Weepah Hills
Lone Mtn.
Gold Mtn.
Bonnie Claire Lake
Sarcobatus Flat
Oasis Valley
Amargosa Range
Bullfrog Hills
Bullfrog
Sand Spring Wash
Beatty Wash
Amargosa River
Miles
Kilometers



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 18

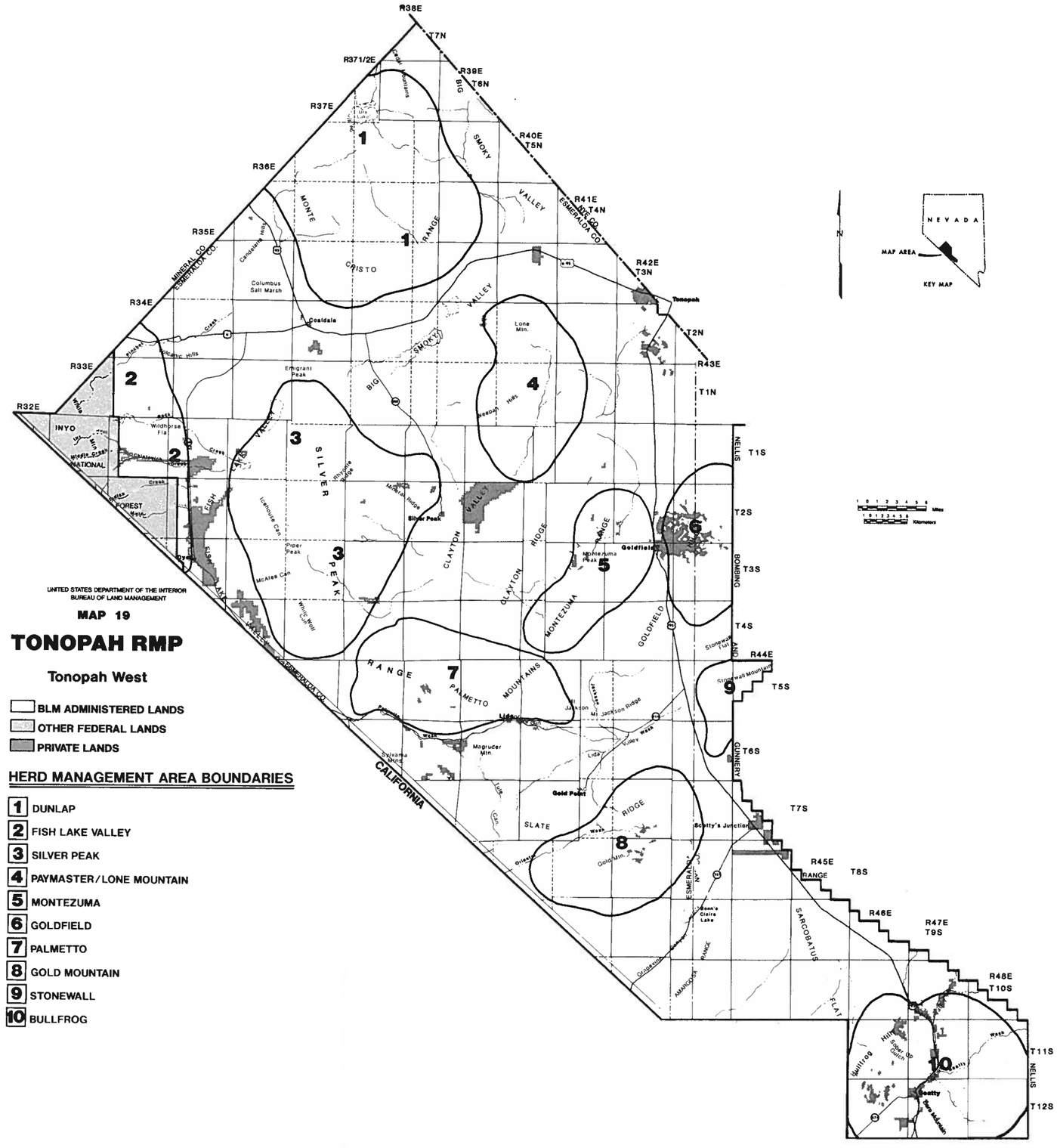
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

HERD MANAGEMENT AREA BOUNDARIES

1. SAND SPRINGS
2. HOT CREEK
3. LITTLE FISH LAKE
4. REVEILLE
5. STONE CABIN
6. SAULSBURY



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 19

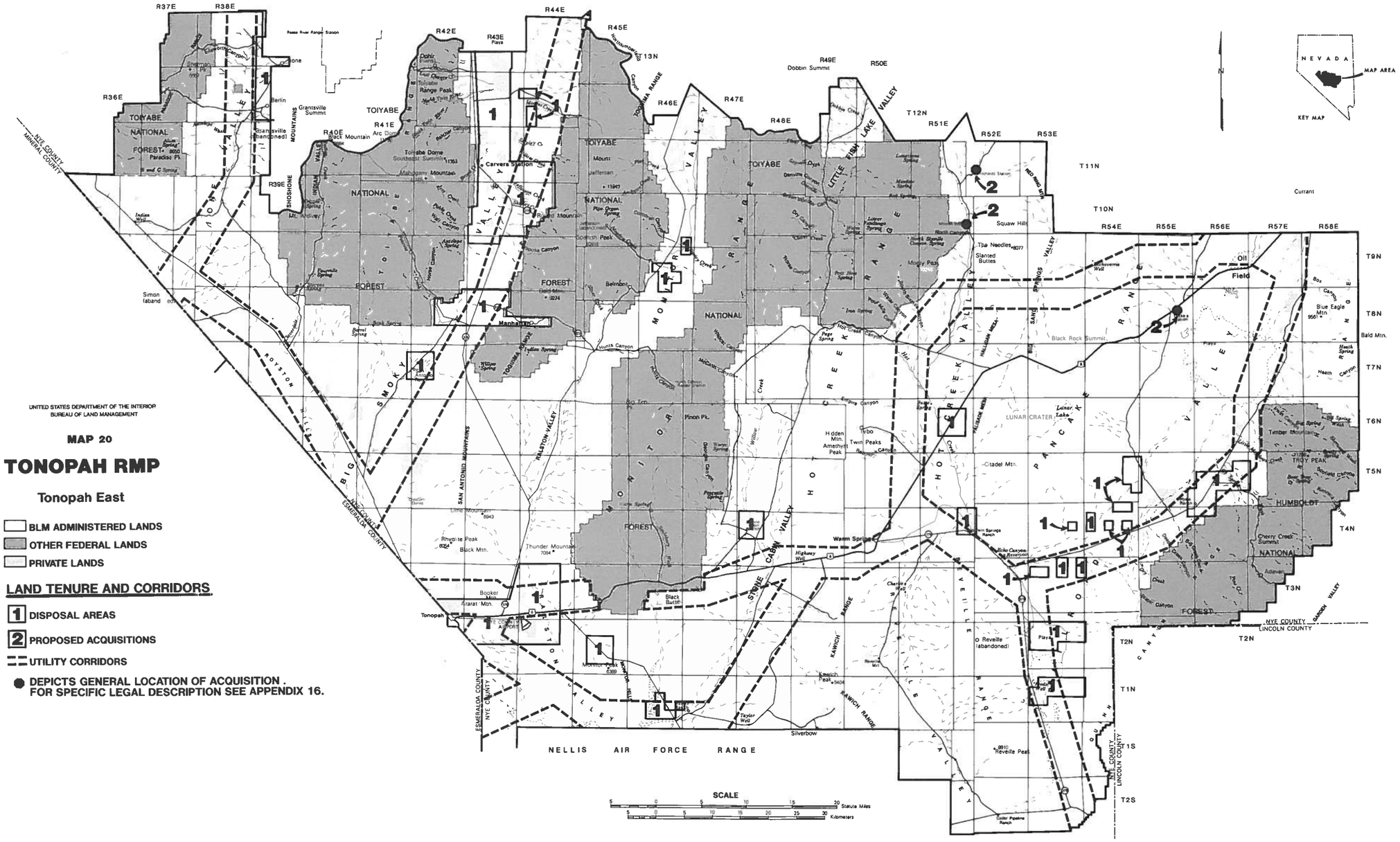
TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

HERD MANAGEMENT AREA BOUNDARIES

1. DUNLAP
2. FISH LAKE VALLEY
3. SILVER PEAK
4. PAYMASTER/LONE MOUNTAIN
5. MONTEZUMA
6. GOLDFIELD
7. PALMETTO
8. GOLD MOUNTAIN
9. STONEWALL
10. BULLFROG



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 20

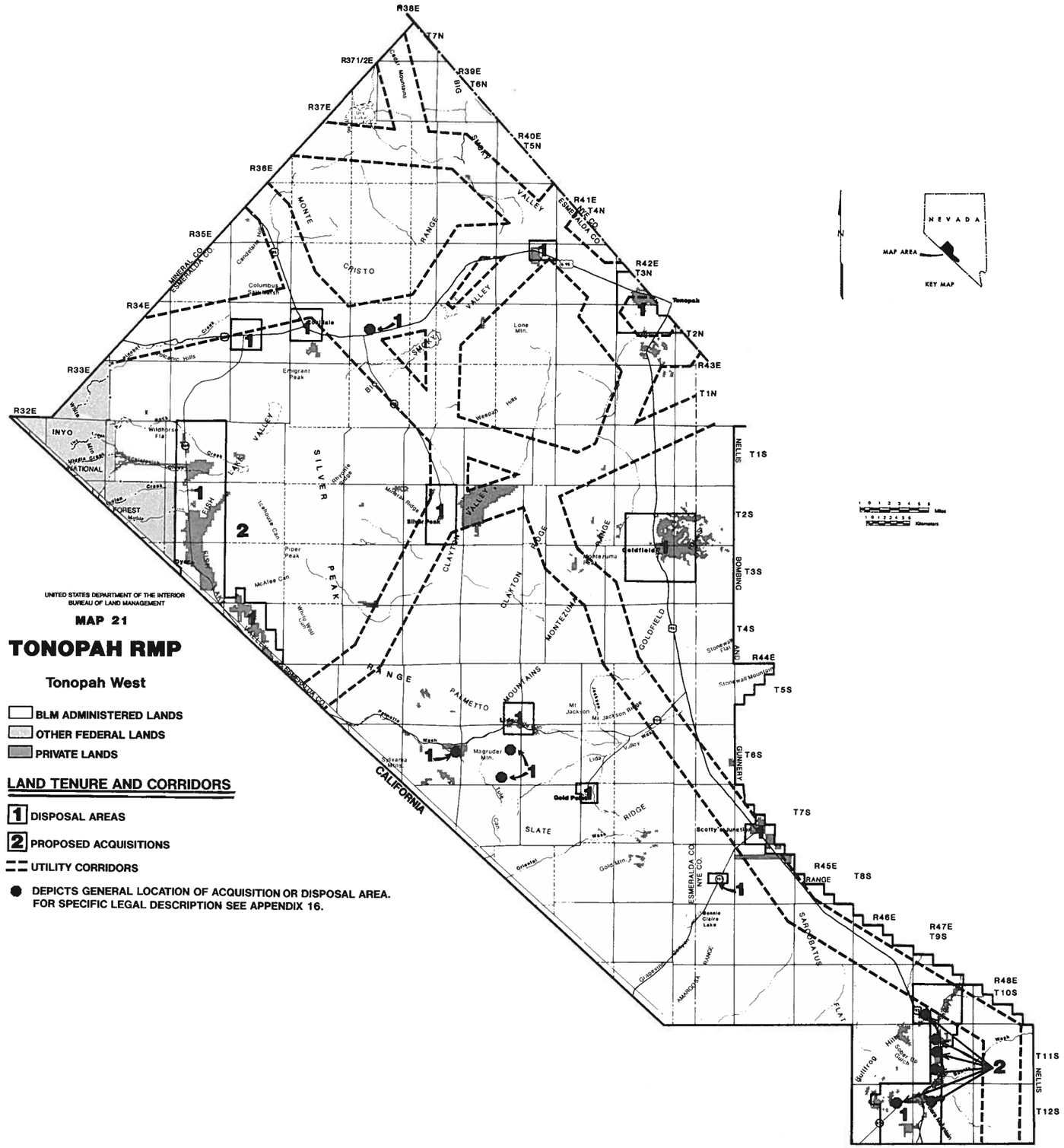
TONOPAH RMP

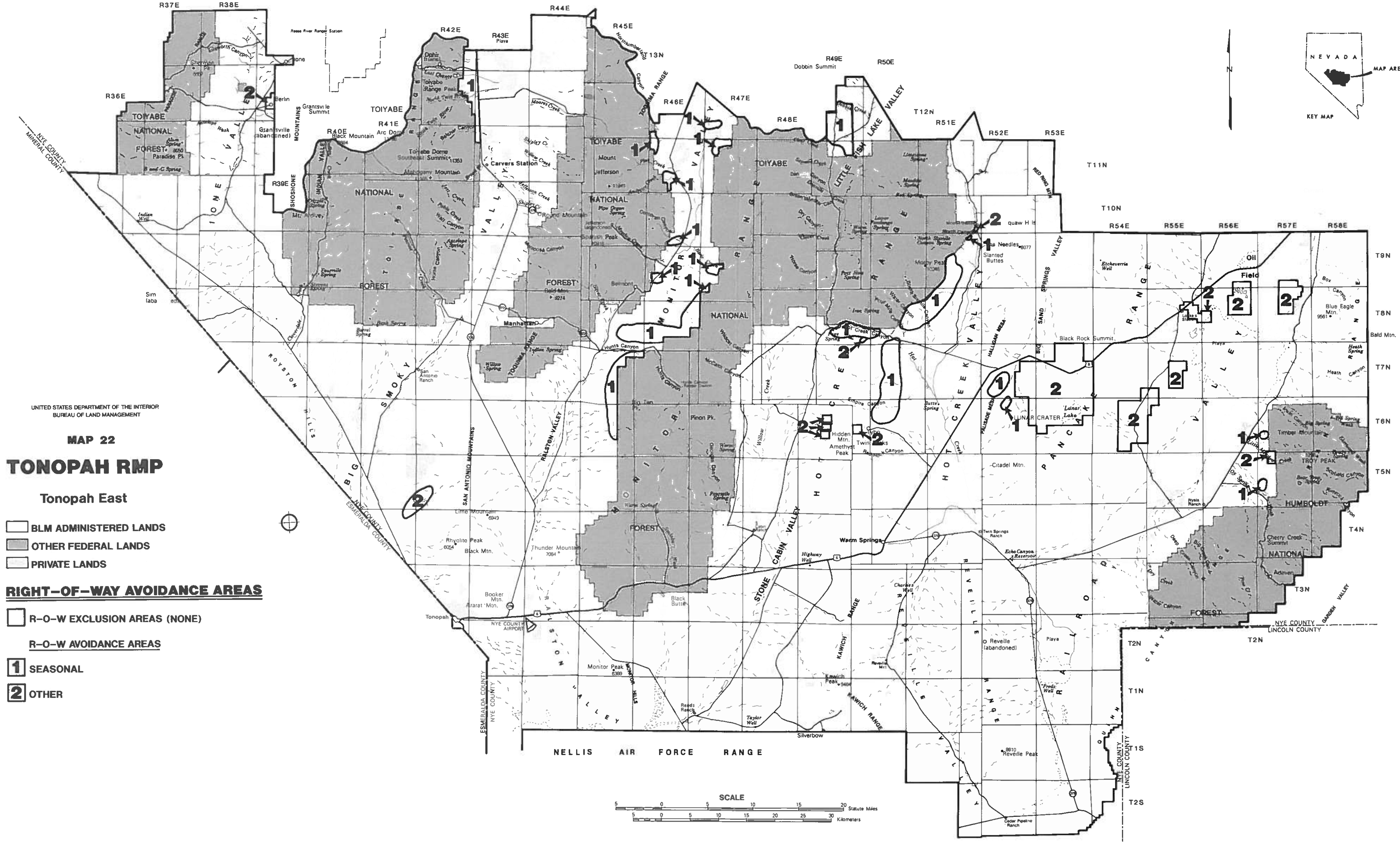
Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

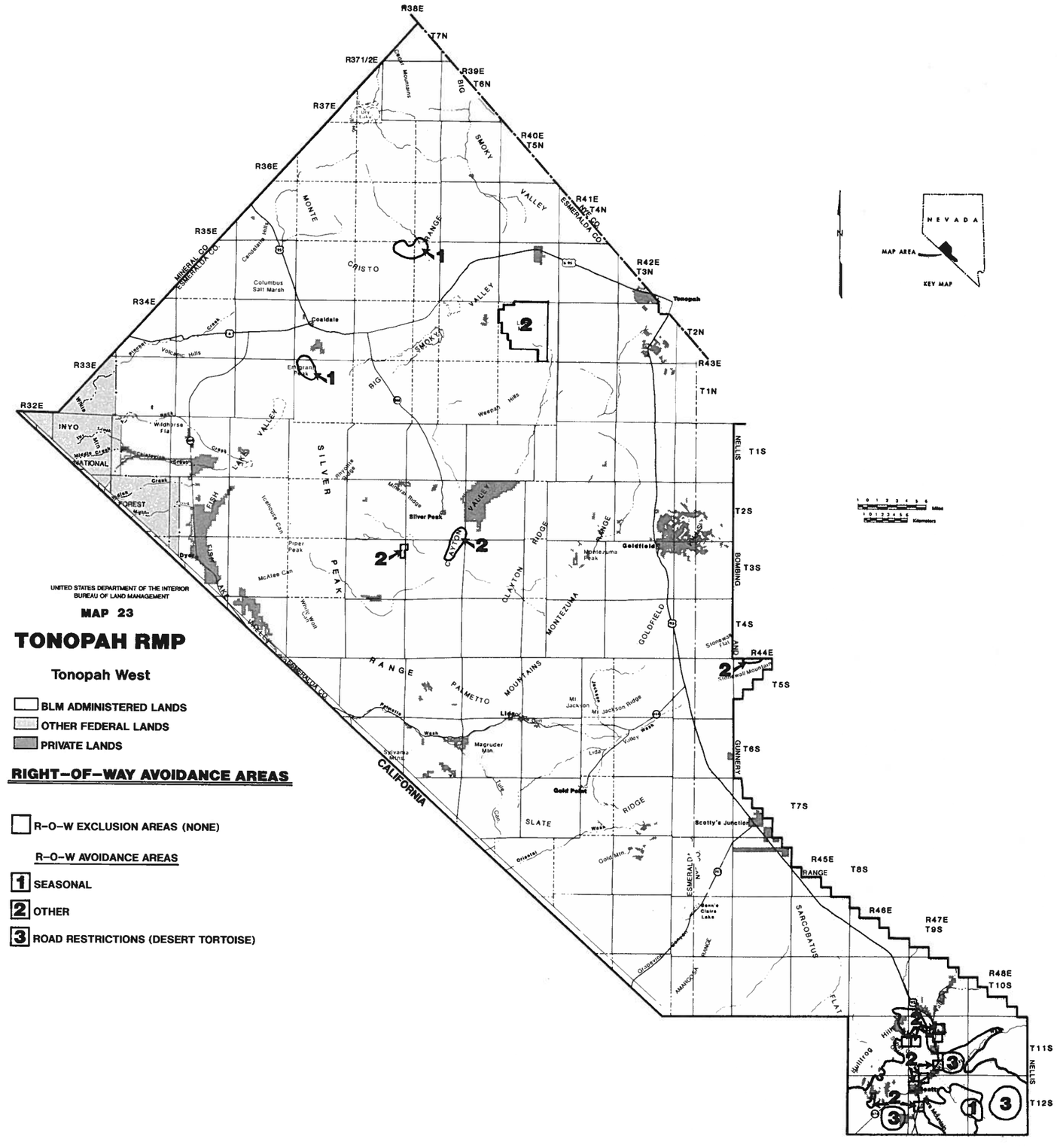
LAND TENURE AND CORRIDORS

- 1 DISPOSAL AREAS
- 2 PROPOSED ACQUISITIONS
- UTILITY CORRIDORS
- ● DEPICTS GENERAL LOCATION OF ACQUISITION . FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.


R38E
T7N
R37 1/2E
R39E
T6N
R37E
R40E
T5N
R36E
R41E
T4N
R35E
R42E
T3N
R34E
T2N
R43E
R33E
T1N
R32E
T1S
T2S
T3S
T4S
R44E
T5S
T6S
T7S
R45E
T8S
R46E
R47E
T9S
R48E
T10S
T11S
T12S
NELLIS
BOMBING
GUNNERY
RANGE
INYO
NATIONAL
FOREST
CALIFORNIA
NEVADA
MAP AREA
KEY MAP
Miles
Kilometers
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 21
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
LAND TENURE AND CORRIDORS
1 DISPOSAL AREAS
2 PROPOSED ACQUISITIONS
UTILITY CORRIDORS
DEPICTS GENERAL LOCATION OF ACQUISITION OR DISPOSAL AREA.
FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 22
TONOPAH RMP
Tonopah East
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
RIGHT-OF-WAY AVOIDANCE AREAS
R-O-W EXCLUSION AREAS (NONE)
R-O-W AVOIDANCE AREAS
1 SEASONAL
2 OTHER
NEVADA
MAP AREA
KEY MAP
N
SCALE
5 0 5 10 15 20 Statute Miles
5 0 5 10 15 20 25 30 Kilometers
R36E
R37E
R38E
R39E
R40E
R41E
R42E
R43E
R44E
R45E
R46E
R47E
R48E
R49E
R50E
R51E
R52E
R53E
R54E
R55E
R56E
R57E
R58E
T13N
T12N
T11N
T10N
T9N
T8N
T7N
T6N
T5N
T4N
T3N
T2N
T1N
T1S
T2S
NYE COUNTY
MINERAL COUNTY
ESMERALDA COUNTY
LINCOLN COUNTY
TOIYABE NATIONAL FOREST
HUMBOLDT NATIONAL FOREST
NELLIS AIR FORCE RANGE
Tonopah
NYE COUNTY AIRPORT
Berlin
Ione
Grantsville (abandoned)
Grantsville Summit
Reese River Ranger Station
Carvers Station
Round Mountain
Manhattan
Belmont
Warm Springs
Silverbow
Reveille (abandoned)
Twin Springs Ranch
Nyala Ranch
Cedar Pipeline Ranch
San Antonio Ranch
Reeds Ranch
IONE VALLEY
SHOSHONE MOUNTAINS
BIG SMOKY VALLEY
ROYSTON HILLS
SAN ANTONIO MOUNTAINS
RALSTON VALLEY
TOQUIMA RANGE
MONITOR VALLEY
MONITOR RANGE
LITTLE FISH LAKE VALLEY
HOT CREEK VALLEY
STONE CABIN VALLEY
SAND SPRINGS VALLEY
PANCAKE RANGE
RAILROAD VALLEY
REVEILLE RANGE
REVEILLE VALLEY
KAWICH RANGE
MONITOR HILLS
HALLIGAN MESA
PALISADE MESA
LUNAR CRATER
Lunar Lake
Black Rock Summit
Oil Field
Toiyabe Range Peak
Toiyabe Dome Southeast Summit 11353
Mahogany Mountain
Black Mountain
Arc Dome
Mount Jefferson
Bald Mtn. 9274
Pinon Pk.
Hidden Mtn.
Amethyst Peak
Twin Peaks
Lime Mountain 6949
Rhyolite Peak 6054
Black Mtn.
Thunder Mountain 7084
Booker Mtn.
Ararat Mtn.
Black Butte
Monitor Peak 6399
Kawich Peak 9404
Reveille Peak 8910
Citadel Mtn.
Slanted Buttes
Blue Eagle Mtn. 9561
Bald Mtn.
Timber Mountain
TROY PEAK
Cherry Creek Summit
Adaven
Hunts Canyon
Empire Canyon
Heath Canyon
Box Canyon
Echo Canyon Reservoir
Highway Well
Charles Well
Taylor Well
Indian Well
Etcheverria Well
Butte Spring
Heath Spring
Dobbin Summit


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 23
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
RIGHT-OF-WAY AVOIDANCE AREAS
R-O-W EXCLUSION AREAS (NONE)
R-O-W AVOIDANCE AREAS
1 SEASONAL
2 OTHER
3 ROAD RESTRICTIONS (DESERT TORTOISE)
R38E
T7N
R37 1/2E
R39E
T6N
R37E
R40E
T5N
R36E
R41E
T4N
R35E
R42E
T3N
R34E
T2N
R43E
R33E
T1N
R32E
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
T12S
R44E
R45E
R46E
R47E
R48E
MINERAL CO.
ESMERALDA CO.
NYE CO.
INYO
NATIONAL
FOREST
CALIFORNIA
NEVADA
MAP AREA
KEY MAP
Tonopah
Goldfield
Silver Peak
Lida
Gold Point
Scotty's Junction
Columbus Salt Marsh
Coaldale
Emigrant Pass
Magruder Mtn.
Mt. Jackson
Mt. Jackson Ridge
Montezuma Peak
Gold Mtn.
Dyer
Miller Mtn.
Sylvania Mtns.
Stonewall Mountain
Stonewall Flat
Cedar Mtns.
Volcanic Hills
Wildhorse Fla
Weepah Hills
Piper Peak
McAtee Can
Lucehouse Can
Silverpeak Range
Mineral Ridge
Cedar Mtns.
Pilot Mtns.
Palmetto Mountains
Palmetto Wash
Lida Wash
Gold Mtn. Wash
Orofino Can.
Grapevine Can.
Amargosa Range
Sarcobatus Flat
Esmeralda Nev.
Dean's Claire Lake
Gunnery Range
Nellis Bombing Range
Big Smoky Valley
Monte Cristo Range
Silver Lake Valley
Fish Lake Valley
Clayton Ridge
Montezuma Range
Goldfield Hills
Slate Ridge
Palmetto Mountains
Cedar Mtns.
Pilot Mtns.
Mullfrog Hills
Bullfrog Hills
Beatty
Amargosa
Miles
Kilometers

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 24

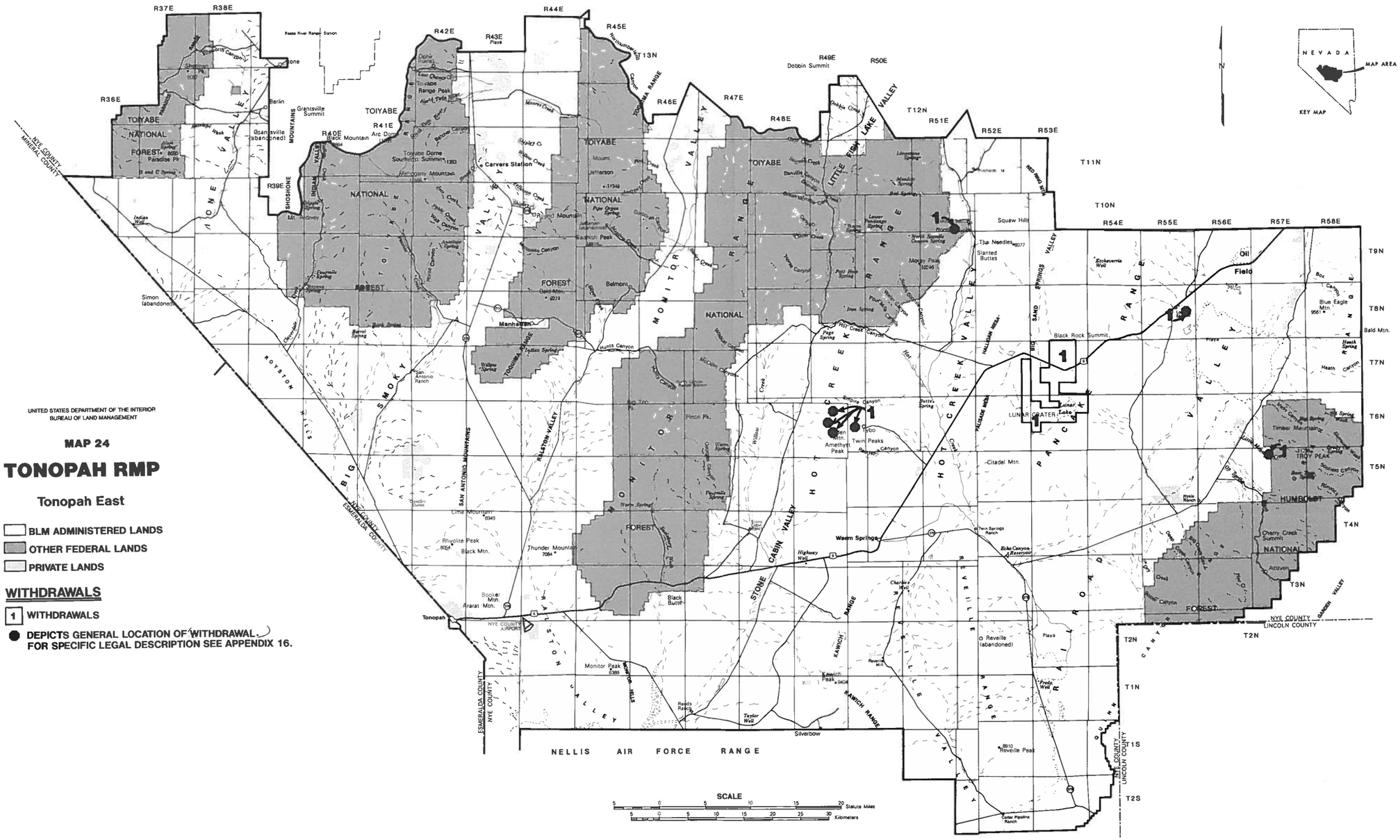
TONOPAH RMP

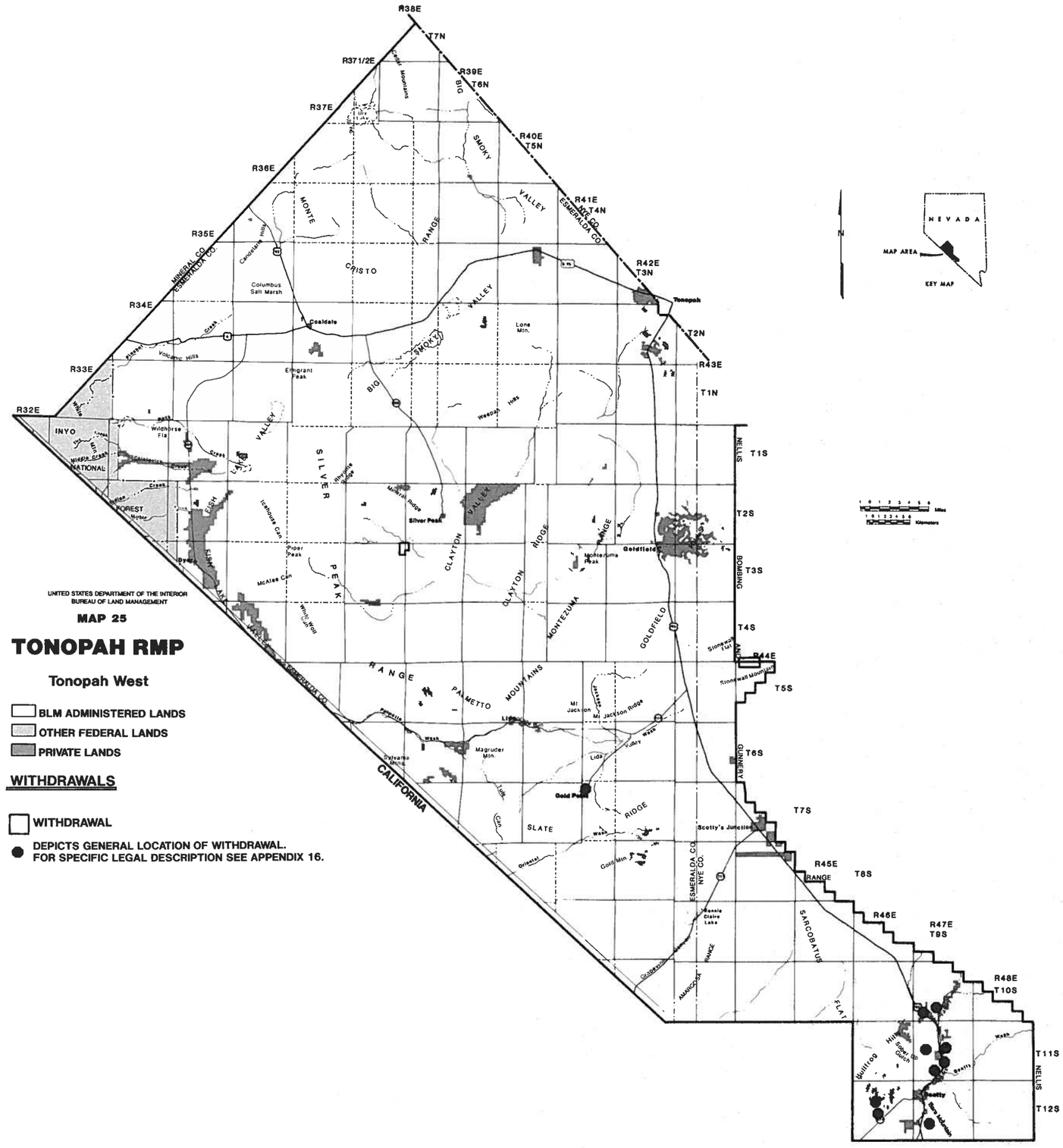
Tonopah East

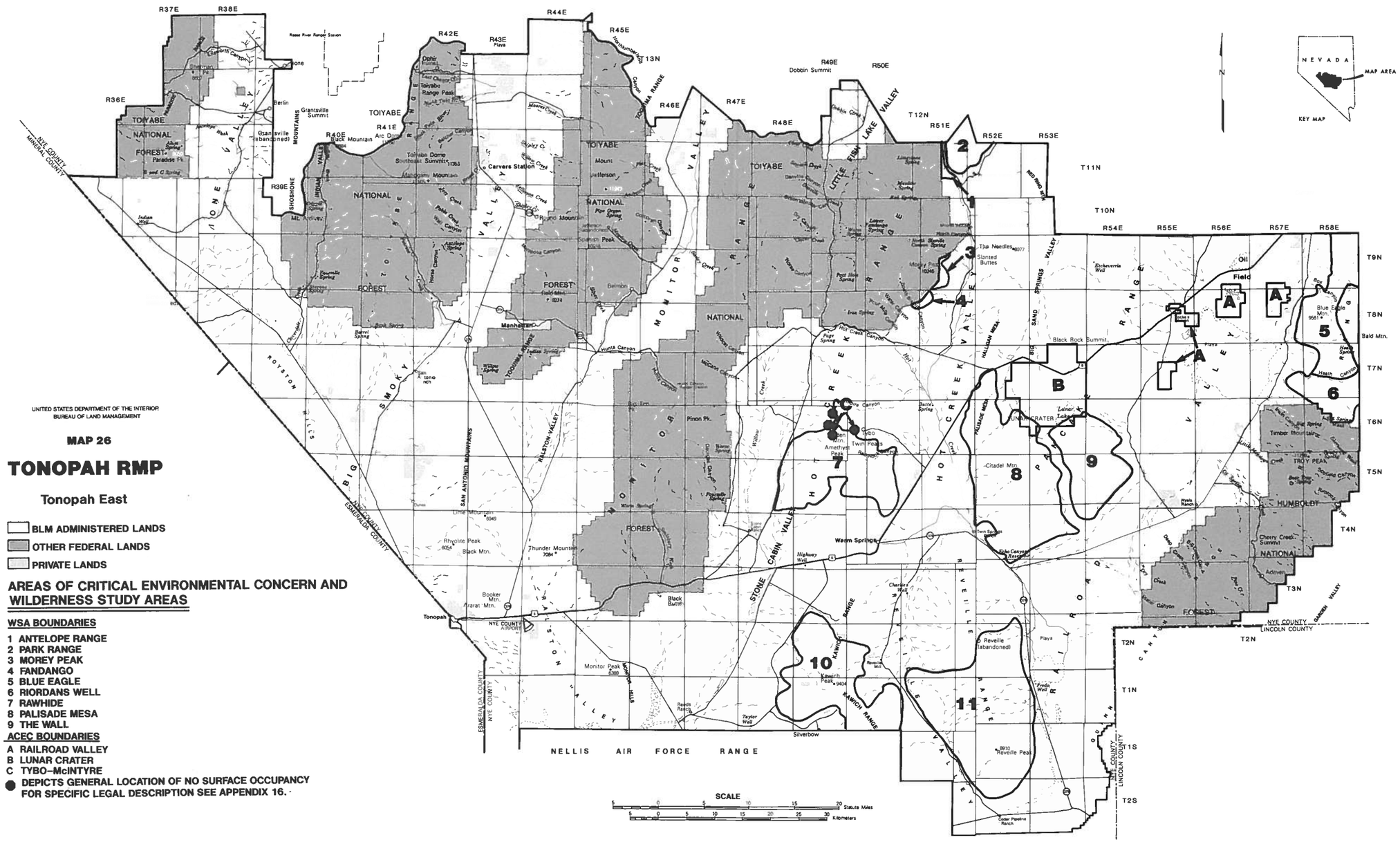
- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

WITHDRAWALS

- 1 WITHDRAWALS
- ● DEPICTS GENERAL LOCATION OF WITHDRAWAL. FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.




UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 25
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
WITHDRAWALS
WITHDRAWAL
DEPICTS GENERAL LOCATION OF WITHDRAWAL.
FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.
R38E
T7N
R371/2E
R39E
T6N
R37E
R40E
T5N
R36E
R41E
T4N
R35E
R42E
T3N
R34E
T2N
R43E
R33E
T1N
R32E
T1S
T2S
T3S
T4S
R44E
T5S
T6S
T7S
R45E
T8S
R46E
R47E
T9S
R48E
T10S
T11S
T12S
MINERAL CO.
ESMERALDA CO.
NYE CO.
INYO
NATIONAL
FOREST
CALIFORNIA
BIG SMOKY VALLEY
MONTE CRISTO RANGE
SILVER PEAK RANGE
CLAYTON RIDGE
MONTEZUMA RANGE
GOLDFIELD
PALMETTO MOUNTAINS
SLATE RIDGE
SARCOBATUS FLAT
BOMBING RANGE
NELLIS
GUNNERY RANGE
Tonopah
Coaldale
Columbus Salt Marsh
Lone Mtn.
Emigrant Peak
Wildhorse Flat
Silver Peak
Goldfield
Lida
Gold Point
Scotty's Junction
Magruder Mtn.
Gold Mtn.
Mt. Jackson
Mt. Jackson Ridge
Monte Cristo Range
Volcanic Hills
Weepah Hills
Clayton Ridge
Silver Peak Range
Palmetto Mountains
Sarcobatus Flat
Stonewall Mountain
Stonewall Flat
Bullfrog Hills
Bullfrog
Beatty
Amargosa Range
Esmeralda Claire Lake
Sylvania Mtn.
Oriental Wash
Gold Mtn. Wash
Lida Wash
Pettyjohn Wash
Mt. Jackson Wash
Beatty Wash
Amargosa Wash
Cottonwood Wash
Mud Lake
Sarcobatus Flat
Grapevine Mountains
Funeral Mountains
Cactus Flat
Ralston Valley
Stonewall Mountain
Mt. Jackson
Lida
Gold Point
Scotty's Junction
Beatty
Amargosa Valley
Bullfrog Hills
Sarcobatus Flat
Esmeralda Claire Lake
Silver Peak
Goldfield
Tonopah
NEVADA
MAP AREA
KEY MAP
Miles
Kilometers



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 26

TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

AREAS OF CRITICAL ENVIRONMENTAL CONCERN AND WILDERNESS STUDY AREAS

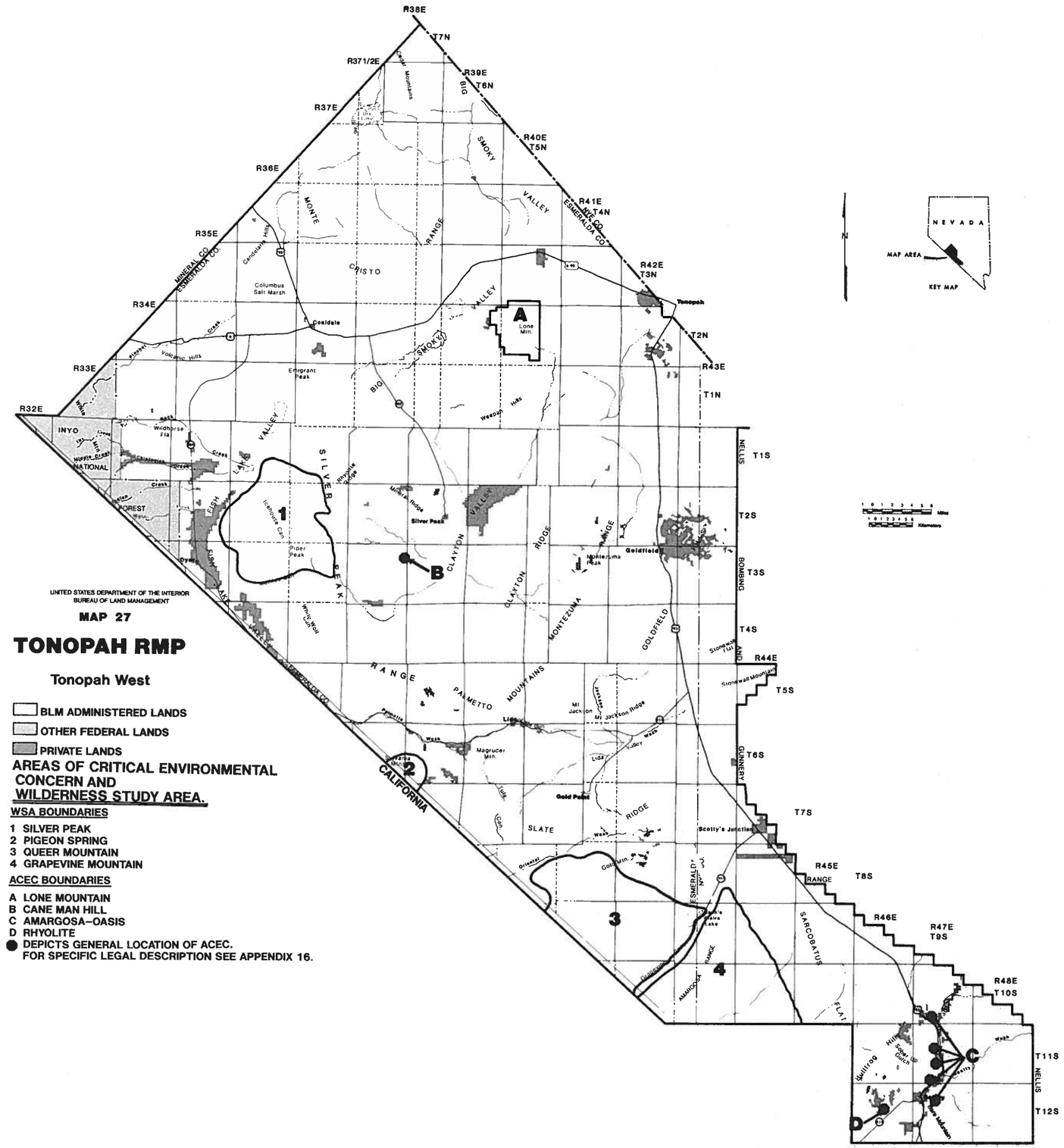
WSA BOUNDARIES

1 ANTELOPE RANGE
2 PARK RANGE
3 MOREY PEAK
4 FANDANGO
5 BLUE EAGLE
6 RIORDANS WELL
7 RAWHIDE
8 PALISADE MESA
9 THE WALL

ACEC BOUNDARIES

A RAILROAD VALLEY
B LUNAR CRATER
C TYBO–McINTYRE

● DEPICTS GENERAL LOCATION OF NO SURFACE OCCUPANCY FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 27

TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

AREAS OF CRITICAL ENVIRONMENTAL CONCERN AND WILDERNESS STUDY AREA.

WSA BOUNDARIES

1 SILVER PEAK
2 PIGEON SPRING
3 QUEER MOUNTAIN
4 GRAPEVINE MOUNTAIN

ACEC BOUNDARIES

A LONE MOUNTAIN
B CANE MAN HILL
C AMARGOSA–OASIS
D RHYOLITE
● DEPICTS GENERAL LOCATION OF ACEC.
FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 28

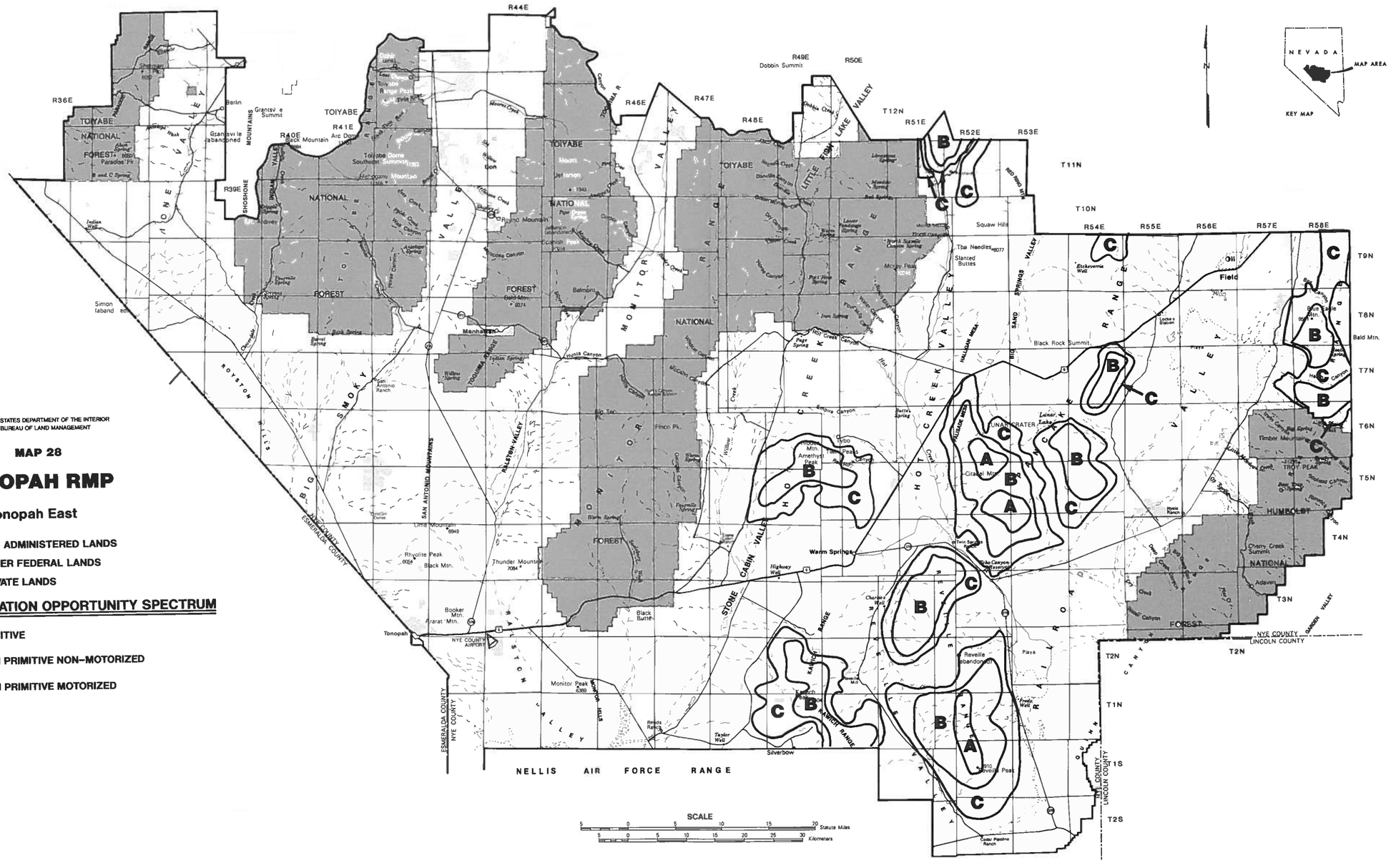
TONOPAH RMP

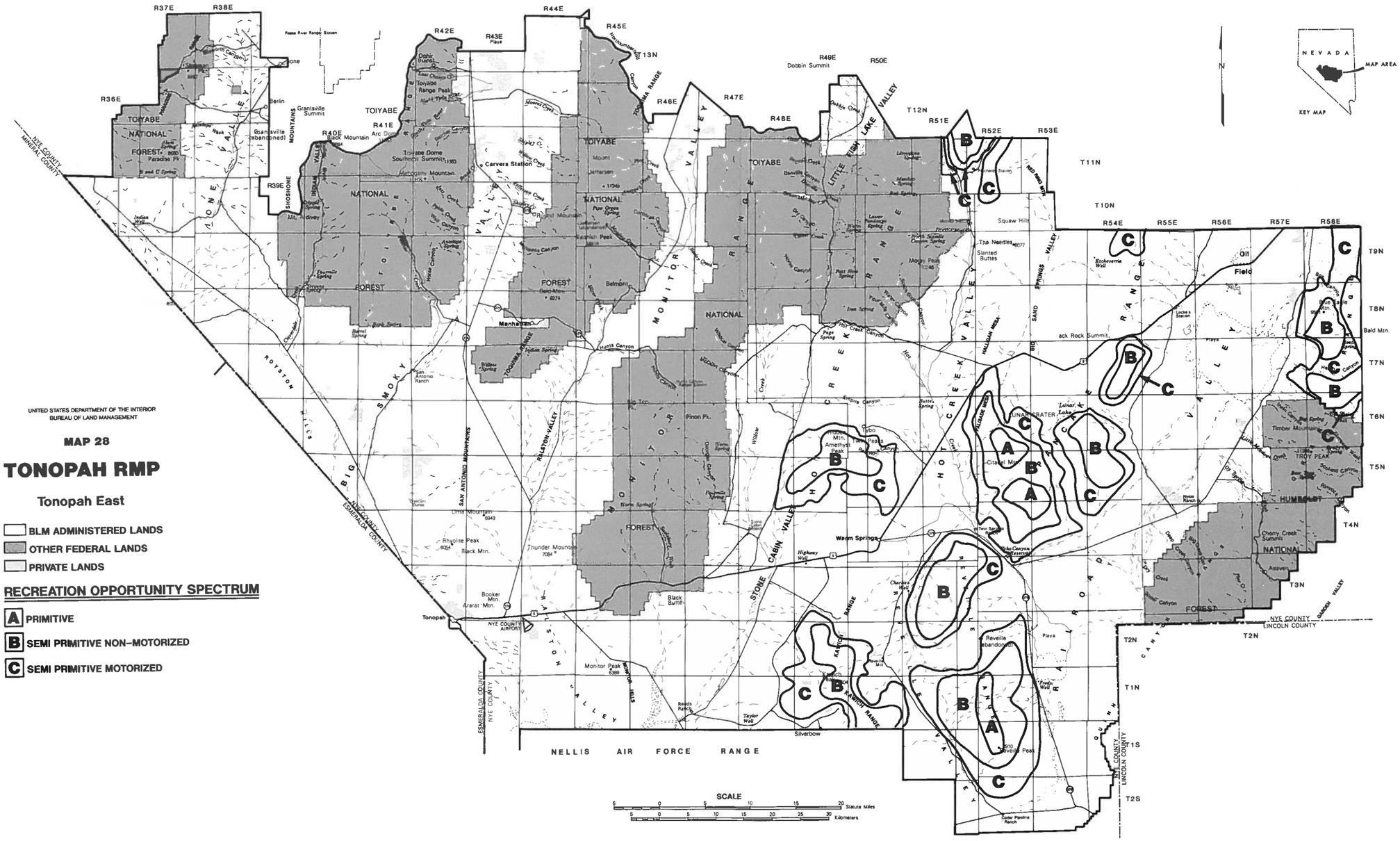
Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

RECREATION OPPORTUNITY SPECTRUM

- A PRIMITIVE
- B SEMI PRIMITIVE NON-MOTORIZED
- C SEMI PRIMITIVE MOTORIZED





UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 28

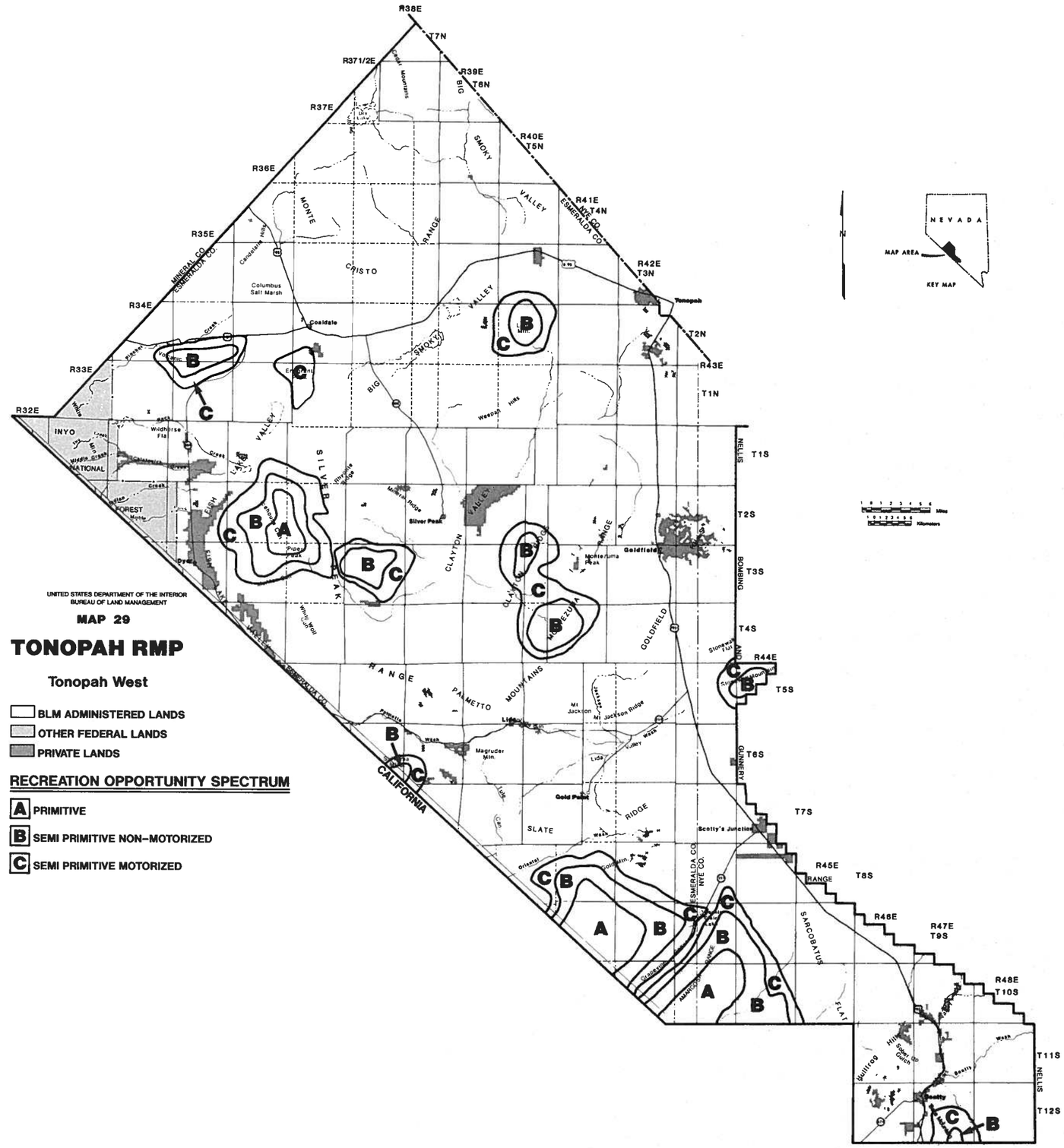
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

RECREATION OPPORTUNITY SPECTRUM

- **A** PRIMITIVE
- **B** SEMI PRIMITIVE NON-MOTORIZED
- **C** SEMI PRIMITIVE MOTORIZED



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 29

TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

RECREATION OPPORTUNITY SPECTRUM

- **A** PRIMITIVE
- **B** SEMI PRIMITIVE NON-MOTORIZED
- **C** SEMI PRIMITIVE MOTORIZED

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 30

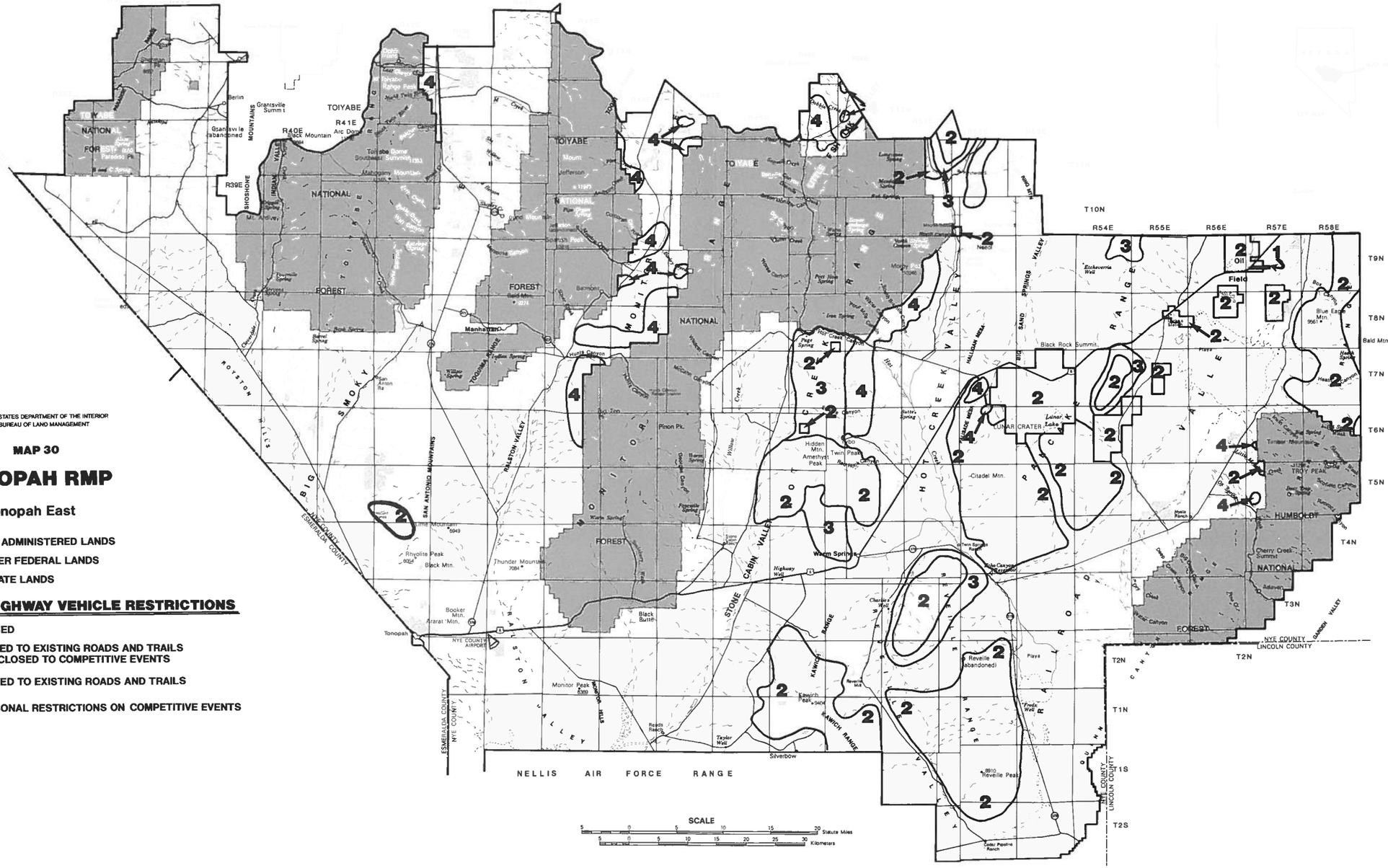
TONOPAH RMP

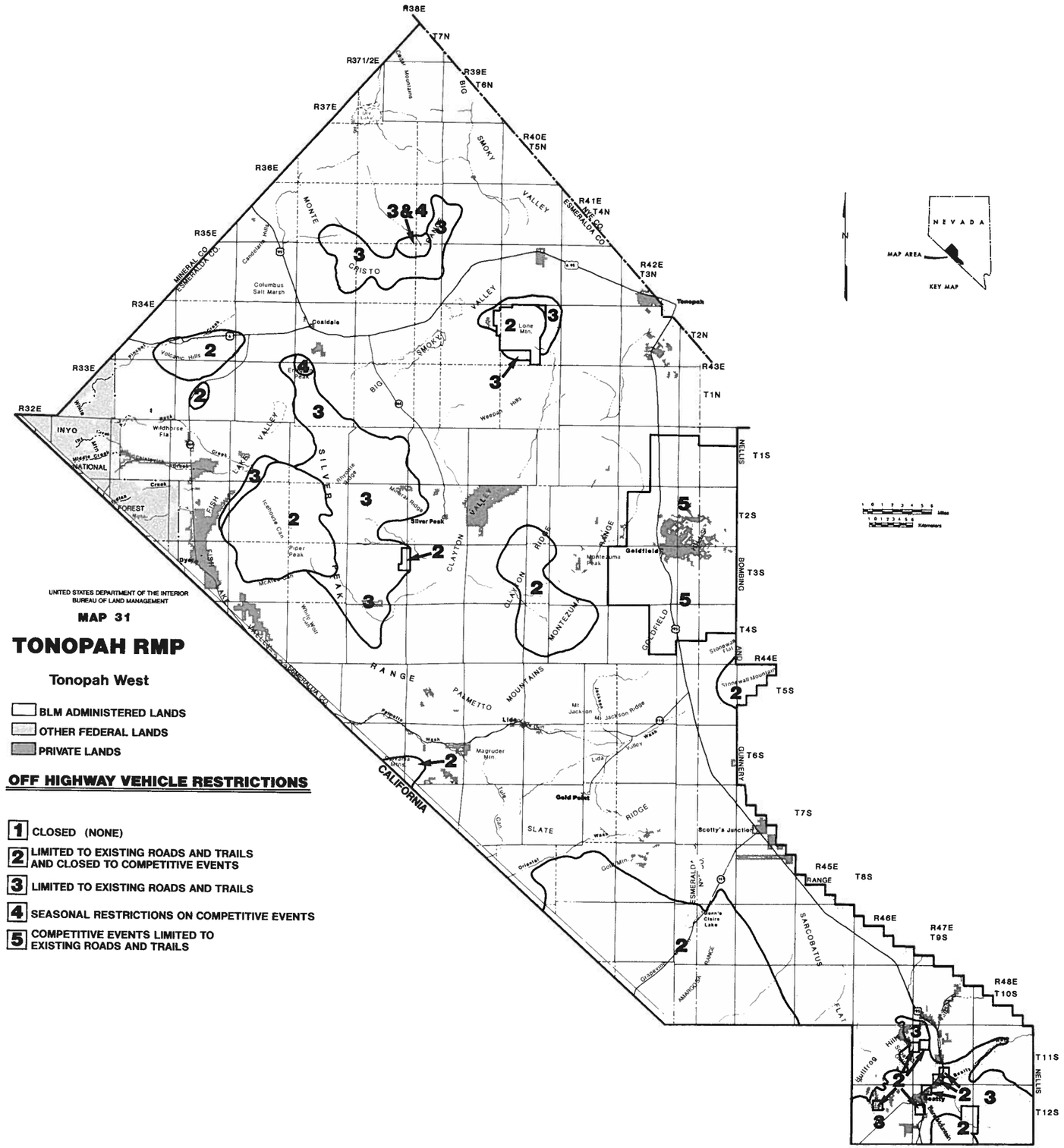
Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

OFF HIGHWAY VEHICLE RESTRICTIONS

1. CLOSED
2. LIMITED TO EXISTING ROADS AND TRAILS AND CLOSED TO COMPETITIVE EVENTS
3. LIMITED TO EXISTING ROADS AND TRAILS
4. SEASONAL RESTRICTIONS ON COMPETITIVE EVENTS





UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 31

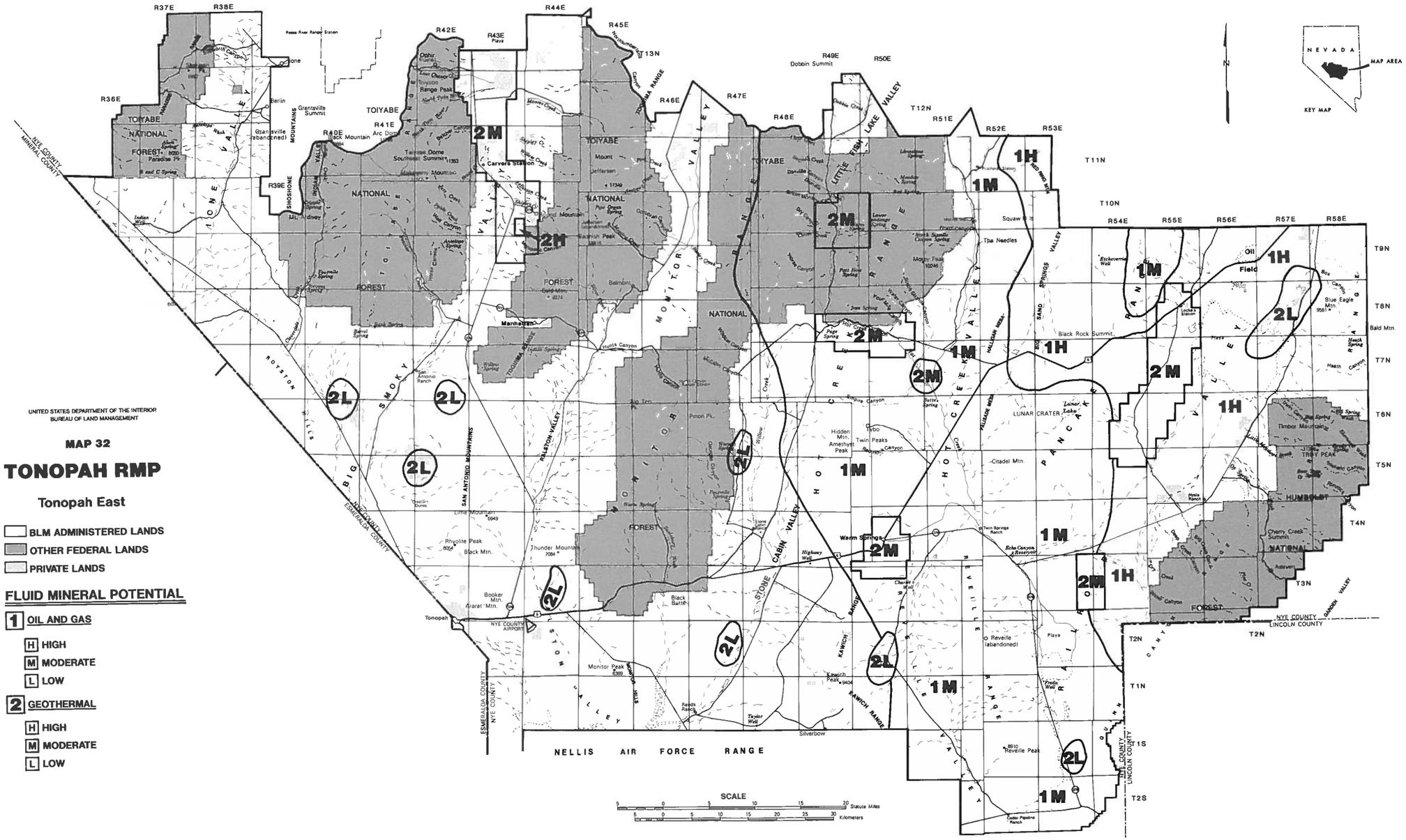
TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

OFF HIGHWAY VEHICLE RESTRICTIONS

1. CLOSED (NONE)
2. LIMITED TO EXISTING ROADS AND TRAILS AND CLOSED TO COMPETITIVE EVENTS
3. LIMITED TO EXISTING ROADS AND TRAILS
4. SEASONAL RESTRICTIONS ON COMPETITIVE EVENTS
5. COMPETITIVE EVENTS LIMITED TO EXISTING ROADS AND TRAILS



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 32

TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

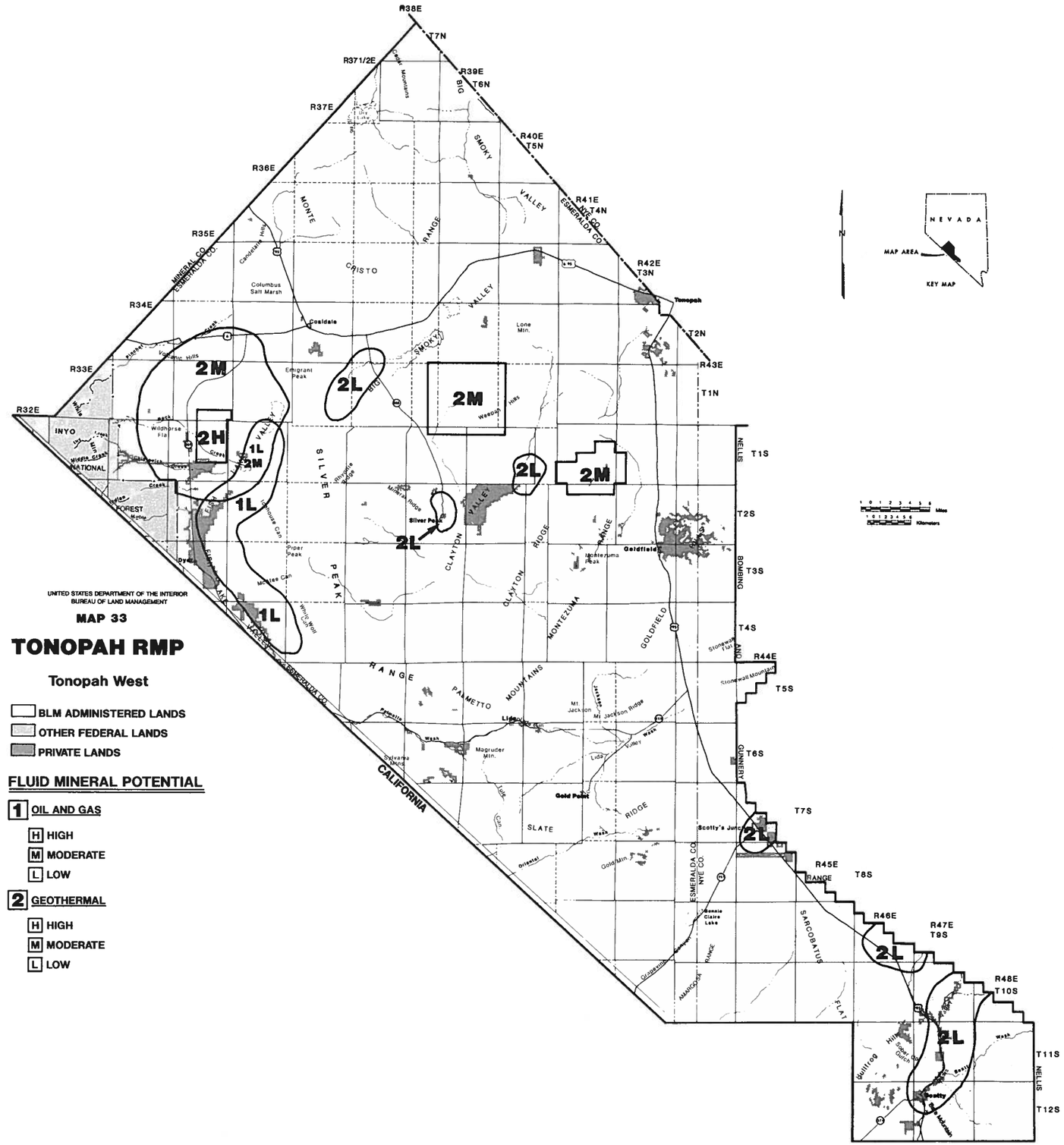
FLUID MINERAL POTENTIAL

1 OIL AND GAS

- H HIGH
- M MODERATE
- L LOW

2 GEOTHERMAL

- H HIGH
- M MODERATE
- L LOW


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 33
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
FLUID MINERAL POTENTIAL
1 OIL AND GAS
H HIGH
M MODERATE
L LOW
2 GEOTHERMAL
H HIGH
M MODERATE
L LOW
NEVADA
MAP AREA
KEY MAP
CALIFORNIA
INYO NATIONAL FOREST
Tonopah
Silver Peak
Goldfield
Lida
Gold Point
Scotty's Junction
Dyer
Coaldale
Columbus Salt Marsh
Emigrant Peak
Lone Mtn.
Wildhorse Flat
Piper Peak
Magruder Mtn.
Mt. Jackson
Mt. Jackson Ridge
Montezuma Peak
Stonewall Mountain
Bonnie Claire Lake
Gold Mtn.
Sylvania Mtns.
Cedar Mountains
Candelaria Hills
Volcanic Hills
Weepah Hills
Minerals Ridge
Silver Peak
Lida Valley
Gold Point
Scotty
Bullfrog Hills
Sobat Gulch
Rhyolite Ridge
Montezuma Ridge
Goldfield Range
Gunnery Range
Sarcobatus Flat
Amargosa Range
Grapevine Canyon
Oriental Wash
Lida Wash
Palmetto Wash
Montee Can
Wild Wolf Can
Mt. Jackson Ridge
Stonewall Flat
Bonnie Claire Lake
Big Smoky Valley
Monte Cristo Range
Silver Peak Range
Clayton Valley
Clayton Ridge
Montezuma Range
Palmetto Mountains
Slate Ridge
Sarcobatus Flat
Nellis Bombing and Gunnery
Mineral Co.
Esmeralda Co.
Nye Co.
Esmeralda Co.
Nye Co.
Esmeralda Co.
Nye Co.
R32E
R33E
R34E
R35E
R36E
R37E
R37 1/2E
R38E
R39E
R40E
R41E
R42E
R43E
R44E
R45E
R46E
R47E
R48E
T7N
T6N
T5N
T4N
T3N
T2N
T1N
T1S
T2S
T3S
T4S
T5S
T6S
T7S
T8S
T9S
T10S
T11S
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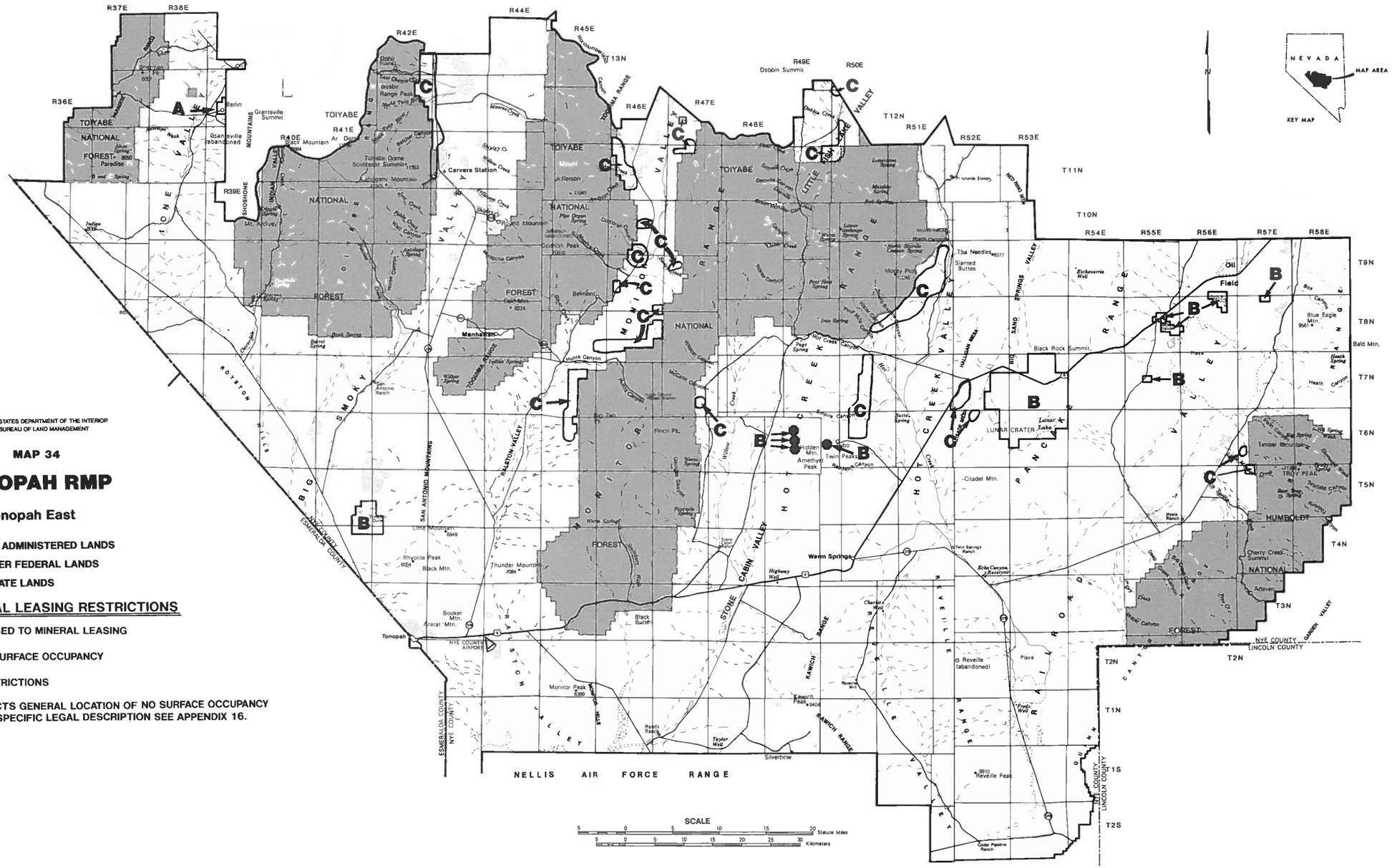


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 34

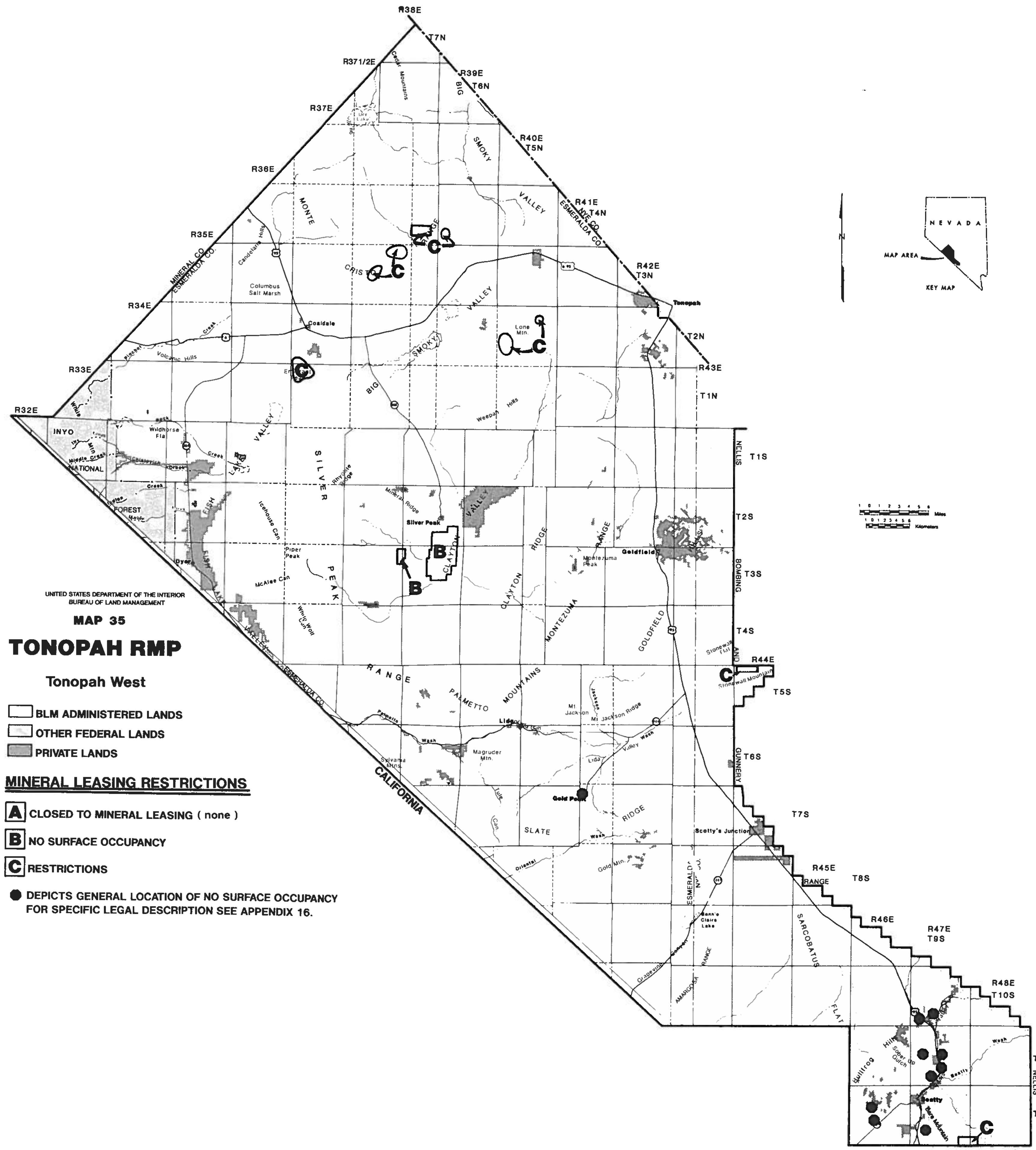
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

MINERAL LEASING RESTRICTIONS

- **A** CLOSED TO MINERAL LEASING
- **B** NO SURFACE OCCUPANCY
- **C** RESTRICTIONS
- ● DEPICTS GENERAL LOCATION OF NO SURFACE OCCUPANCY FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 35

TONOPAH RMP

Tonopah West

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

MINERAL LEASING RESTRICTIONS

A CLOSED TO MINERAL LEASING (none)

B NO SURFACE OCCUPANCY

C RESTRICTIONS

● DEPICTS GENERAL LOCATION OF NO SURFACE OCCUPANCY FOR SPECIFIC LEGAL DESCRIPTION SEE APPENDIX 16.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 36

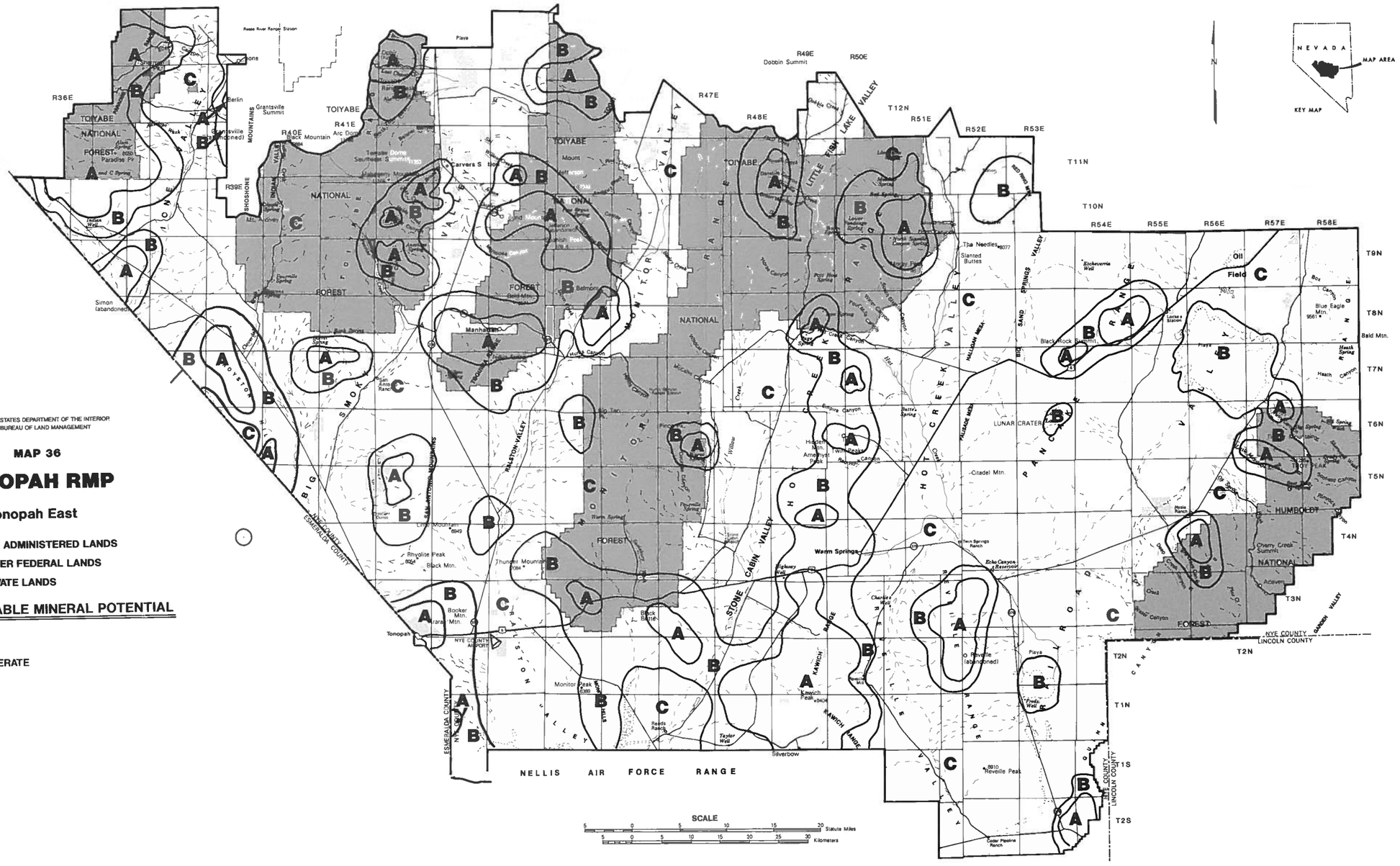
TONOPAH RMP

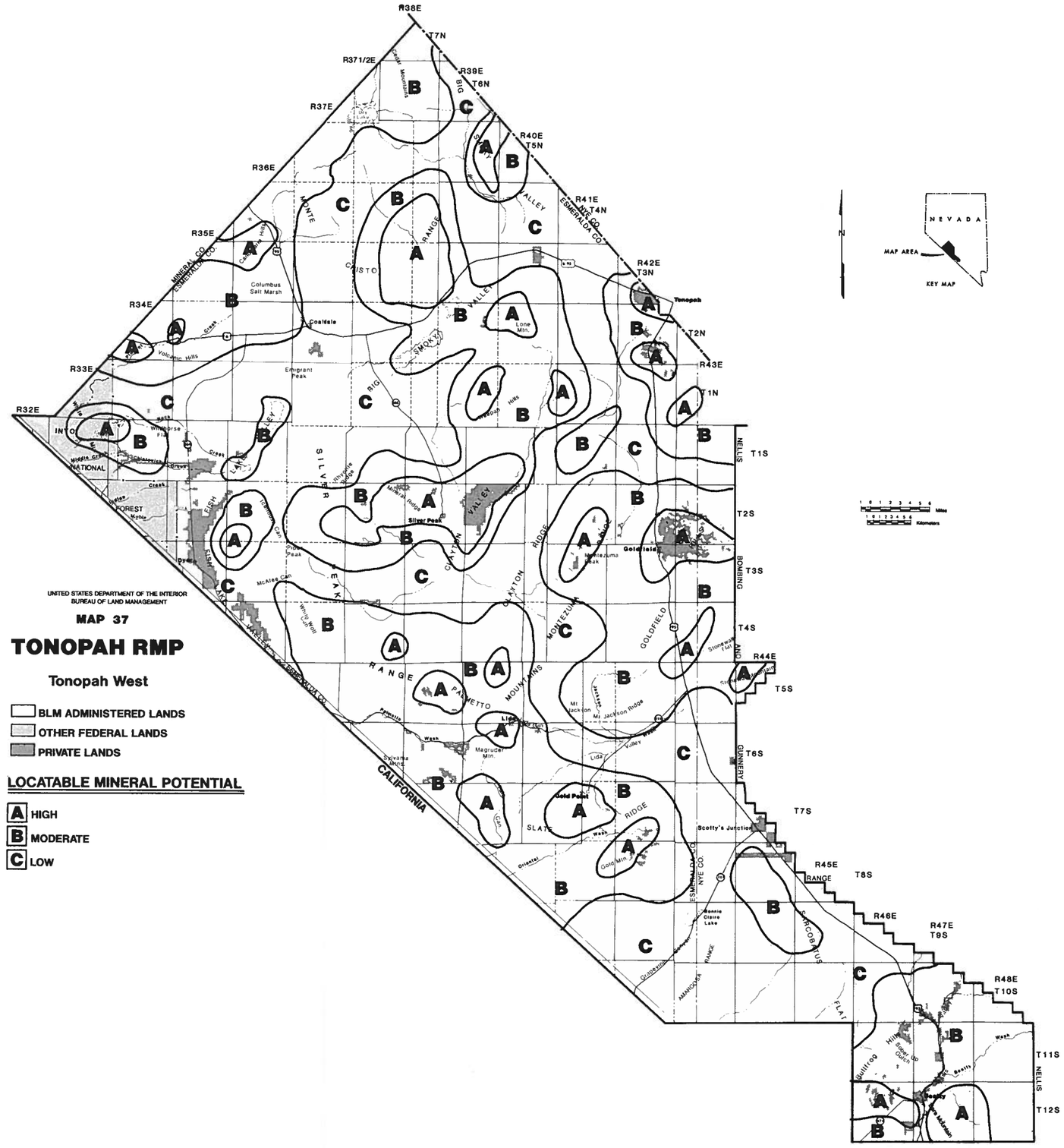
Tonopah East

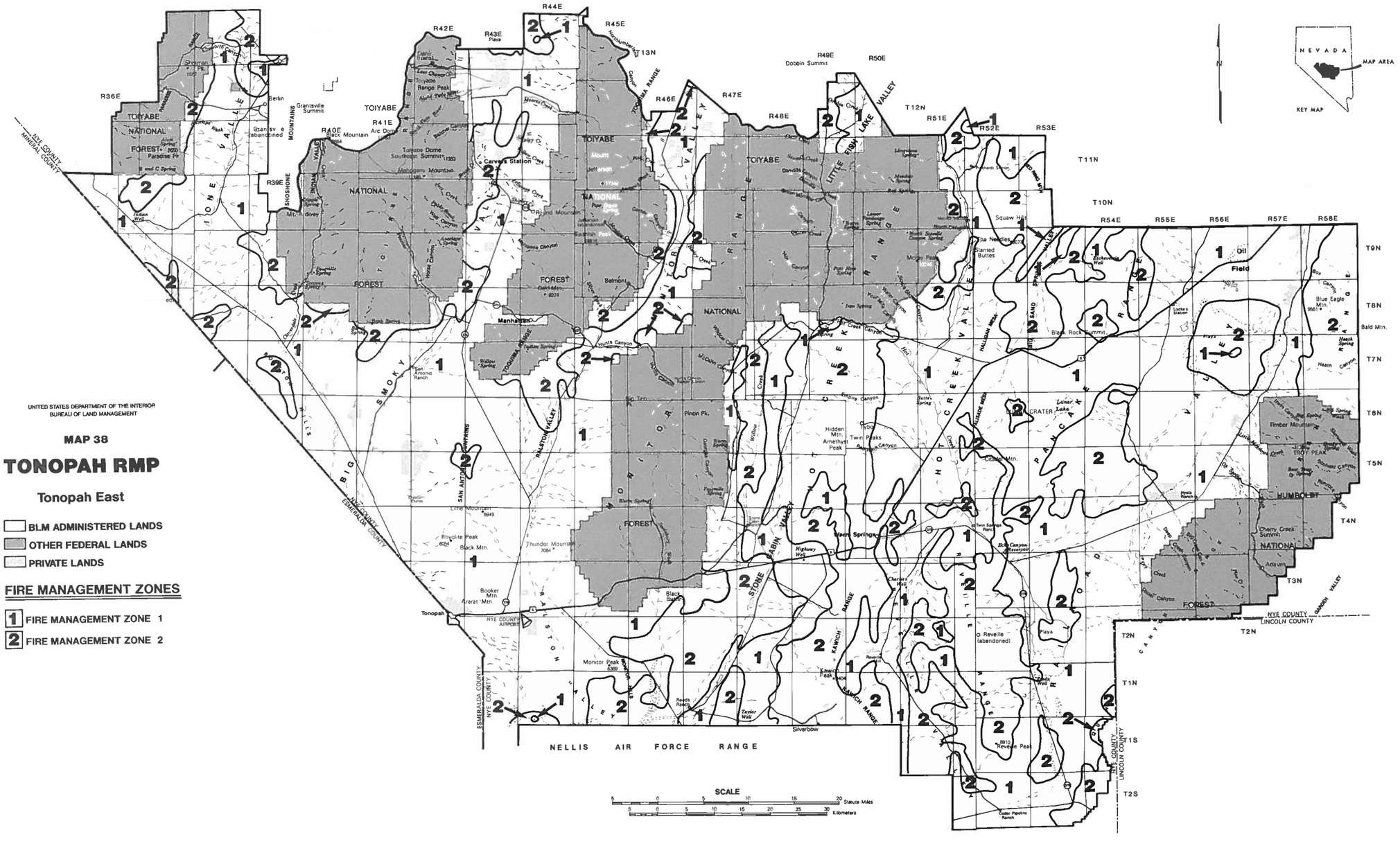
- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

LOCATABLE MINERAL POTENTIAL

- A HIGH
- B MODERATE
- C LOW




UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 37
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
LOCATABLE MINERAL POTENTIAL
A HIGH
B MODERATE
C LOW
NEVADA
MAP AREA
KEY MAP
CALIFORNIA
Tonopah
Goldfield
Silver Peak
Gold Point
Scotty's Junction
Columbus Salt Marsh
Emigrant Peak
Lone Mtn.
Magruder Mtn.
Mt. Jackson
Bennie Clarke Lake
Miles
Kilometers



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MAP 38

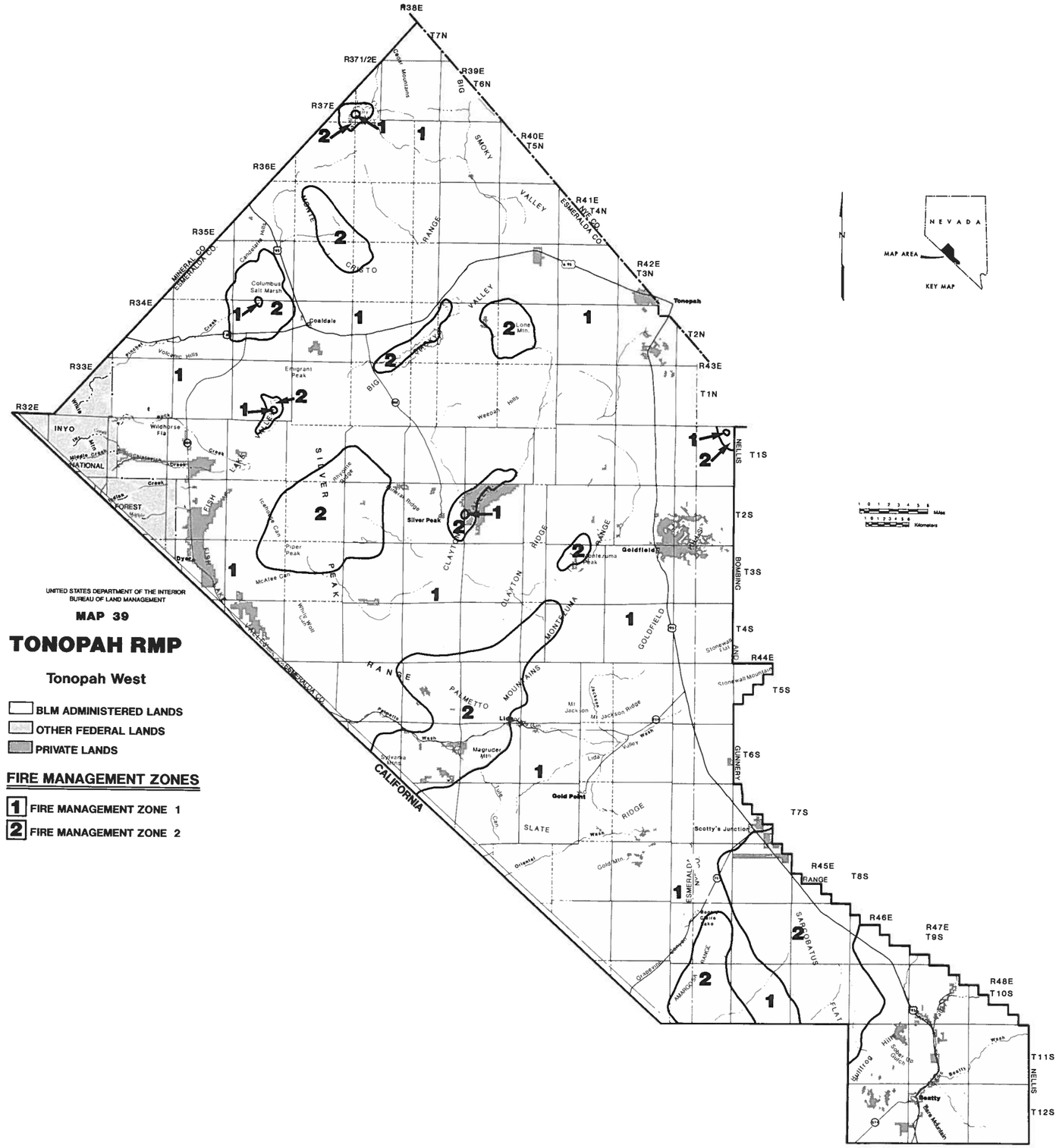
TONOPAH RMP

Tonopah East

- BLM ADMINISTERED LANDS
- OTHER FEDERAL LANDS
- PRIVATE LANDS

FIRE MANAGEMENT ZONES

- 1 FIRE MANAGEMENT ZONE 1
- 2 FIRE MANAGEMENT ZONE 2


UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
MAP 39
TONOPAH RMP
Tonopah West
BLM ADMINISTERED LANDS
OTHER FEDERAL LANDS
PRIVATE LANDS
FIRE MANAGEMENT ZONES
1 FIRE MANAGEMENT ZONE 1
2 FIRE MANAGEMENT ZONE 2
NEVADA
MAP AREA
KEY MAP
CALIFORNIA
Tonopah
Goldfield
Silver Peak
Gold Point
Scotty's Junction
Beatty
Columbus Salt Marsh
Coaldale
Emigrant Peak
Wildhorse Flat
Dyer
Magruder Mtn
Lone Mtn.
Montezuma Peak
Mt Jackson
Stonewall Mountain
Bare Mountain
Hillsboro
Sarcobatus Flat
Amargosa Range
Grapevine Canyon
Gold Mtn.
Lida Valley
Mt Jackson Ridge
Lida
Palmetto Mountains
Silver Peak Range
Clayton Ridge
Montezuma Range
Goldfield Range
Cedar Mountains
Volcanic Hills
Weepah Hills
Piper Peak
McAfee Can
Icehouse Can
White Wolf Can
Sylvania Mtns
Petrette Wash
Oriental Wash
Gold Mtn.
Lida Valley Wash
Stonewall Flat
Hillsboro Wash
Beatty Wash
Sarcobatus Flat
Amargosa Range
Grapevine Canyon
Mineral Ridge
Whipple Ridge
Cedar Mountains
Cadiz Hills
Mineral Co
Esmeralda Co
Nye Co
Inyo National Forest
Fish Lake Valley
Big Smoky Valley
Monte Cristo Range
Silver Peak
Clayton Range
Goldfield Range
Palmetto Range
Sarcobatus Flat
Amargosa Range
Nellis Bombing and Gunnery Range
Miles
Kilometers