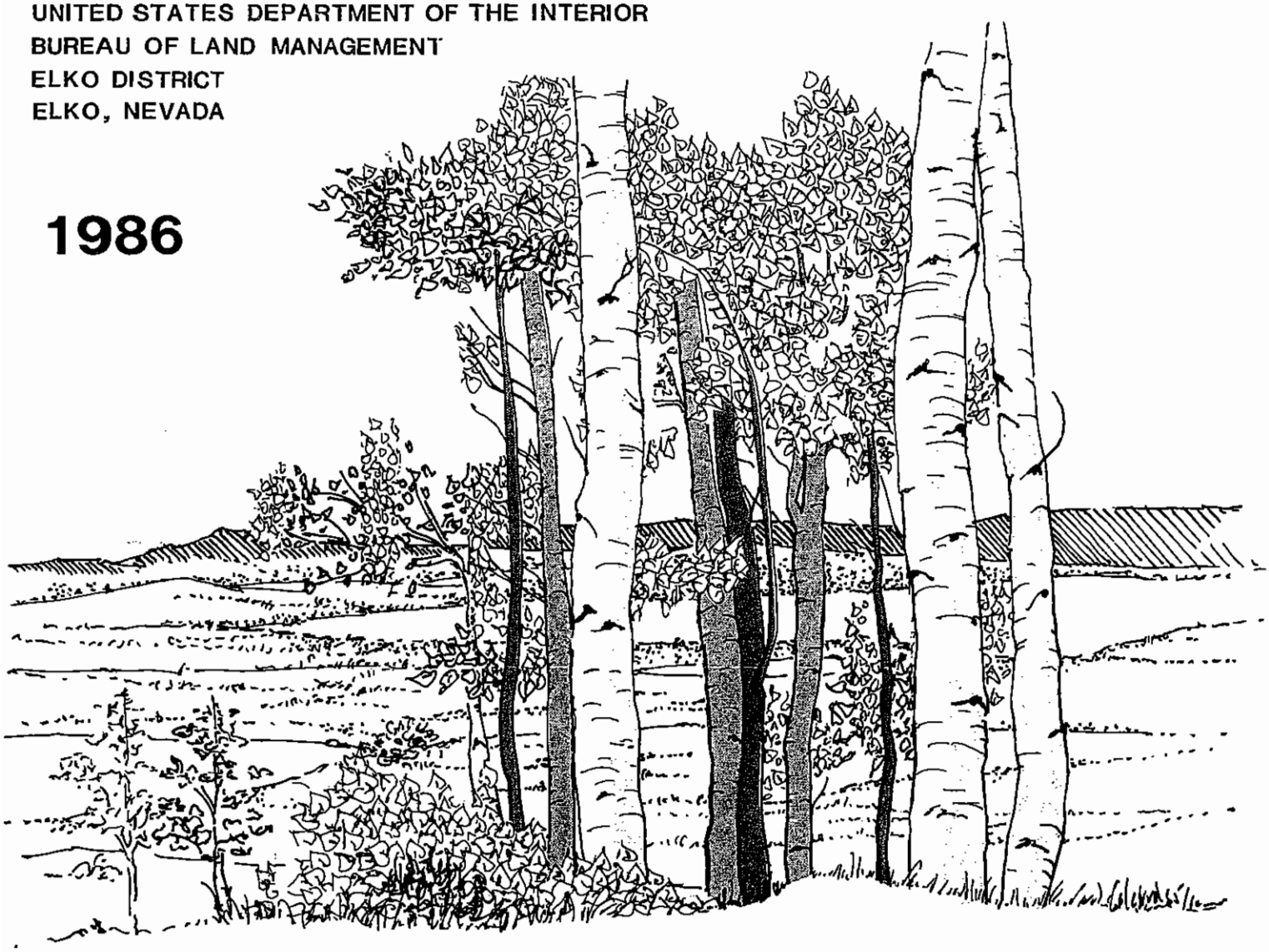
FINAL ELKO

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT ELKO RESOURCE AREA

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT
ELKO, NEVADA

1986



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AND FINAL ENVIRONMENTAL IMPACT STATEMENT

for the

ELKO RESOURCE AREA

NEVADA

Prepared by the

DEPARTMENT OF THE INTERIOR
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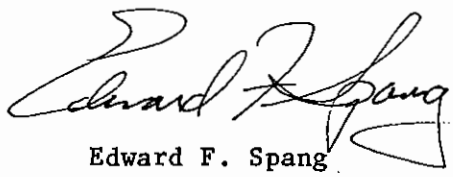
Elko District Office



Edward F. Spang
Nevada State Director

The proposed resource management plan is a long range plan to manage 3.1 million acres of public land within the Elko Planning Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that require the Bureau of Land Management to develop land use plans for public lands and to study the suitability of certain lands for wilderness designation. An integral environmental impact statement assesses the environmental consequences of the plan.

This document is both the proposed resource management plan and the final environmental impact statement. The final resource management plan will be approved by the State Director and published in a record of decision following public review of this document. Wilderness recommendations in the plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness has been prepared as required by the Bureau's Wilderness Study Policy.

For further information contact: Rodney Harris, District Manager, 3900 East Idaho Street, P.O. Box 831, Elko, Nevada 89801.

Date this final statement was made available to the Environmental Protection Agency and to the Public:

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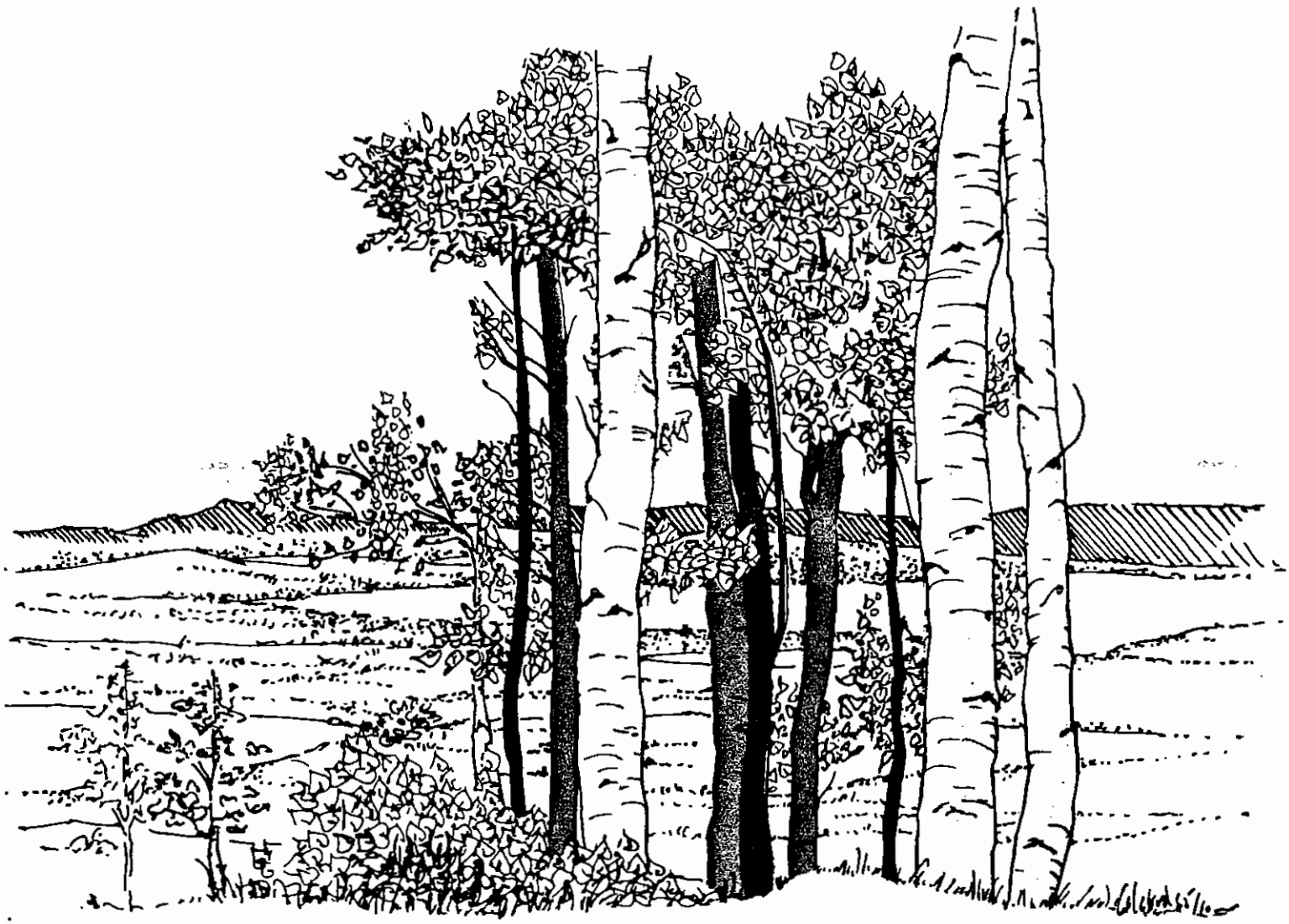

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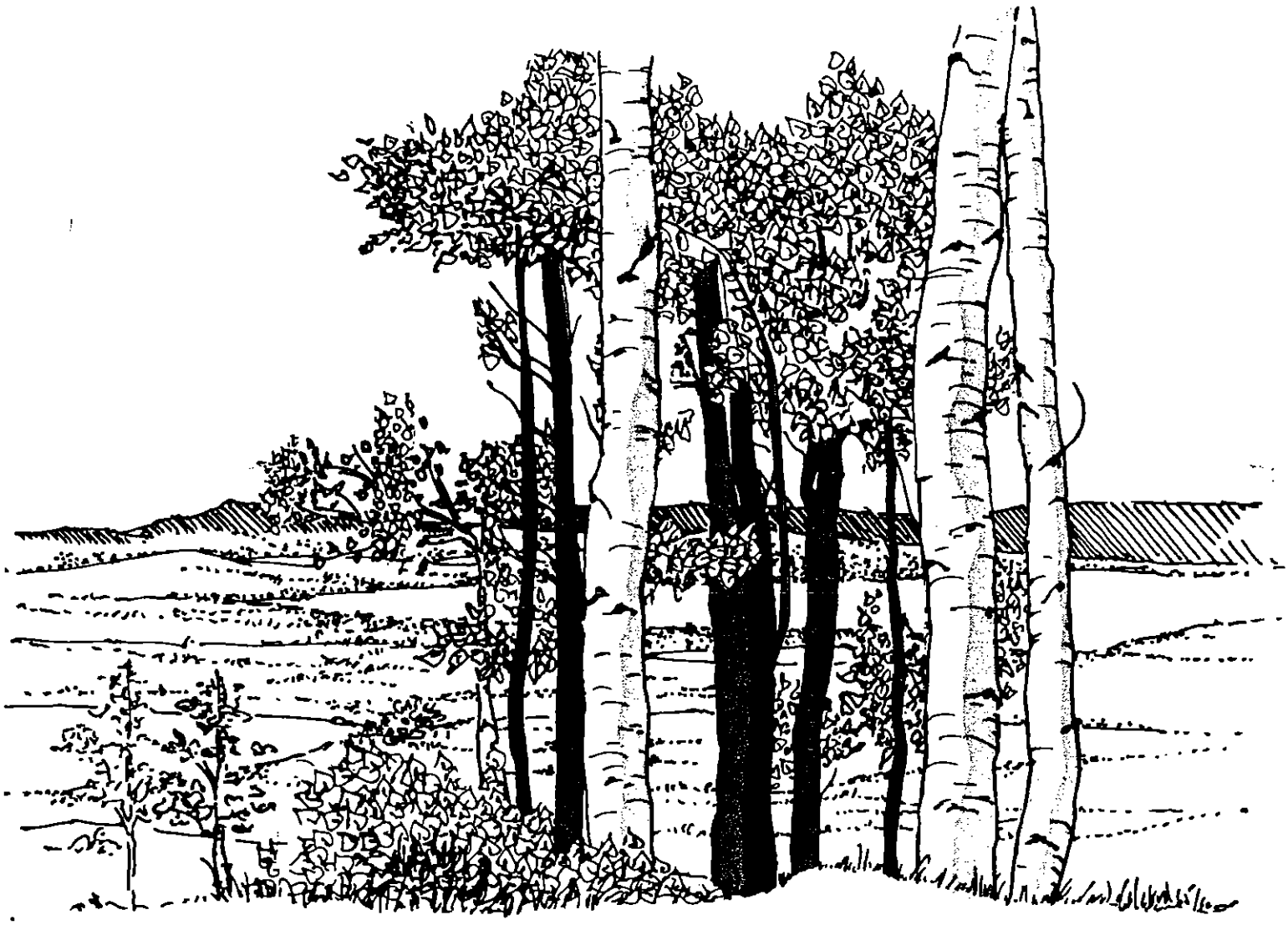
SUMMARY



INTRODUCTION

The Bureau of Land Management (BLM) is proposing to implement a long-term (20 year) resource management plan (RMP) for the Elko Resource Area of the Elko District in Nevada. The RMP is being prepared to provide a comprehensive framework for future management of public lands in the resource area. This document presents both a proposed management plan and an environmental impact statement (EIS) on the plan.

The Elko Resource Area consists of three planning units, the North Fork, Buckhorn, and Tuscarora. These are combined in this document as the RMP area or planning area (Elko Resource Management Plan Area Map). The RMP area consists of approximately 5.9 million acres in the western half of Elko County and northern portions of Lander and Eureka Counties. Over 3.1 million acres are public lands administered by the BLM.

This RMP is focused on resolving ten issues identified early in the planning process. These include:

1. Lands and Realty
2. Corridors
3. Access
4. Recreation
5. Wilderness
6. Livestock Grazing
7. Wildlife Habitat
8. Wild Horses
9. Woodland Products
10. Minerals

ALTERNATIVES

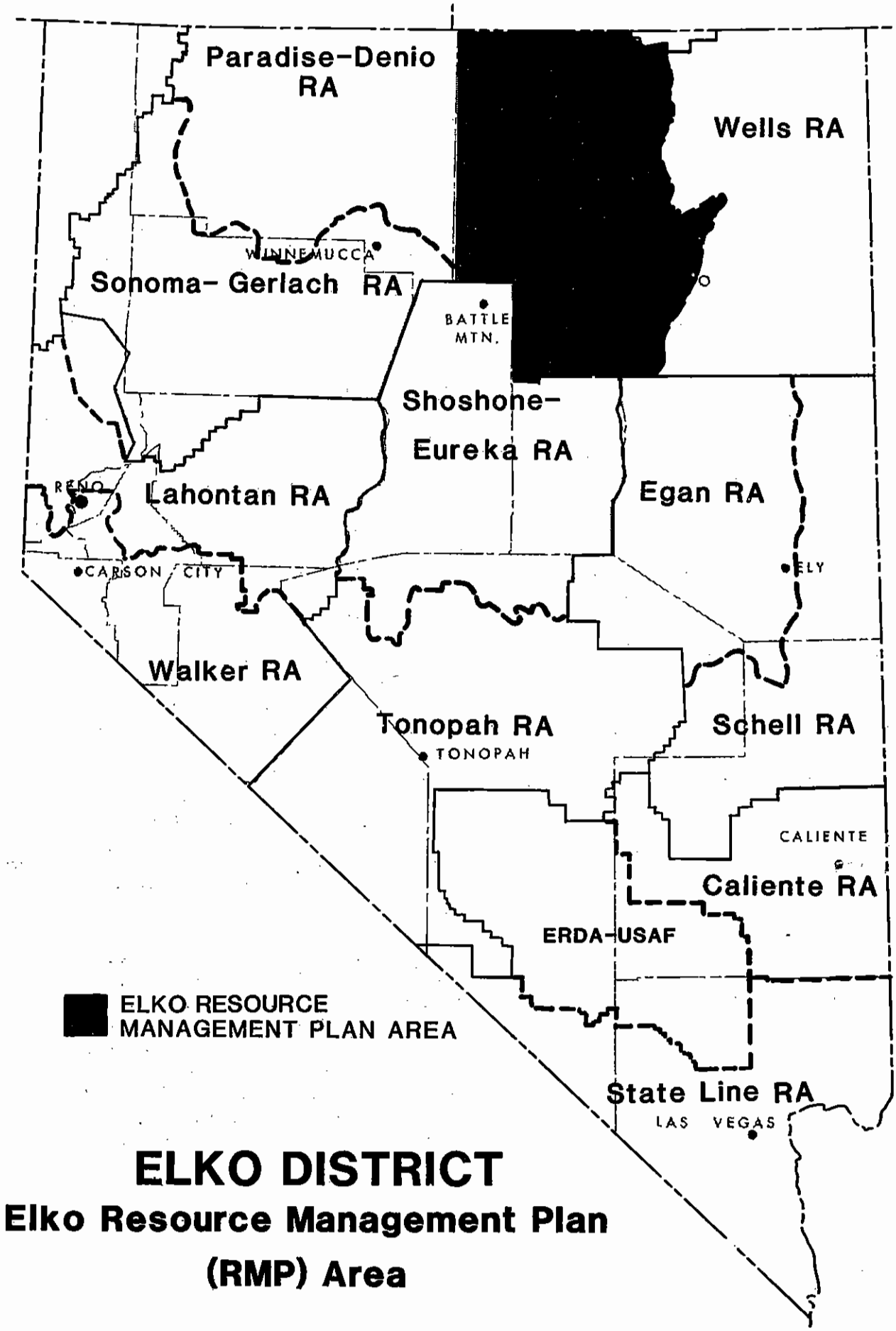
Five alternatives were developed for this RMP. A preferred resource management plan and four other alternatives examined various levels of uses and solutions to problems occurring in the Elko RMP Area. They are all multiple-use oriented but each emphasizes a different balance among resources.

Alternative A: This alternative represents a continuation of present resource management and use levels as required in 43 CFR 1610.4-5. Actions would be taken on a case-by-case basis as circumstances warrant except for wilderness, where this alternative provides for the mandatory "No Wilderness" analysis.

Alternative B: This alternative is oriented towards production of commercial resources with emphasis on livestock, minerals, land disposal, motorized recreation, woodland production, and utility corridors.

Alternative C: This alternative provides for the enhancement of fragile and unique natural resource values with emphasis on wildlife, wild horses, and wilderness. This provides for the mandatory "All Wilderness" analysis.

Alternative D: This is the proposed alternative. It provides for a mix of natural and commercial resource uses based on the relative value of those uses. It has been selected as the proposed alternative because it best meets the public's demand for goods and services while minimizing disruption of the human environment.



ELKO DISTRICT

Elko Resource Management Plan (RMP) Area

Alternative E: This alternative was developed to provide for baseline data and a comparative analysis of the elimination of livestock grazing from public lands.

A comparative summary of the management actions and environmental consequences of each alternative is displayed in the following Summary Tables 1 and 2.

SUMMARY TABLE 1
MANAGEMENT ACTIONS

ISSUE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D (Proposed)	ALTERNATIVE E
Lands and Realty (Identify for disposal)	Case-by-Case	5,900 acres for community expansion; 58,320 acres for sale; and 336,000 acres	5,900 acres for community expansion; 212,480 acres for for exchange.	5,900 acres for community expansion; 8,340 acres for sale; 243,200 acres available for exchange.	See Alternative C
Corridors (Designate/Identify)	Case-by-Case	333 miles transportation/utility lines; 276 miles planning corridors.	219 miles of transportation/utility lines. No planning corridors.	243 miles of transportation/utility lines; 130 miles planning corridors.	See Alternative C
Legal Access (Acquire)	Case-by-Case	Legal access for 56 roads (216.5 miles).	Legal access for 24 roads (72.5 miles).	Legal access for 60 roads (242 miles).	Legal access for 14 roads (50 miles).
Recreation	Maintain four SRMA[1/]: (South Fork Owyhee River (3,500 ac.), Wilson Reservoir (5,440 ac.), Zunino/Jiggs Reservoir (800 ac.), and North Wildhorse Recreation Area (210 ac.).	Maintain four SRMAs: (see Alt. A); Designate two SRMAs: West Wildhorse Recreation Area (160 ac.) and Adobe Hills (21,120 ac.).	Maintain three SRMAs: South Fork Owyhee River (3,500 ac.), Wilson Reservoir (5,440 ac.), and Zunino/Jiggs Reservoir (800 ac.). Designate South Fork Humboldt River SRMA (3,360 ac.) and Wildhorse SRMA[2/] (5,760 ac.).	See Alternative C	See Alternative C
	Maintain entire RMP area open to ORV use.	Designate 98% RMP area open to ORVs; 2% limited to existing roads and trails.	Designate 97% RMP area open to ORVs; 3% limited to designated roads and trails.	Designate 98% RMP area open to ORVs; 2% limited to designated roads and trails.	See Alternative C

1/ Special Recreation Management Area

2/ Inclues North Wildhorse SRMA

SUMMARY TABLE 1
MANAGEMENT ACTIONS

ISSUE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D (Proposed)	ALTERNATIVE E
Wilderness (Suitable Acres)	Recommended all Wilderness Study Areas unsuitable.	Recommended 28,386 ac. of Little Humboldt River WSA as suitable.	Recommend 66,754 ac. (all) in four WSAs as suitable. WSA as suitable.	Recommend 36,460 ac. in Rough Hills WSA & Little Humboldt River	See Alternative C
Livestock Grazing (AUMs)	Continue authorized use level which has resulted in an averaged licensed use of 305,247 AUMs.	Increase AUMs by 62% over current level, 27% over active preference. Implement AMPs on 37 Category I Allotments, 11 Category M Allotments and one Category C Allotments.	Reduced AUMs by 50% of active preference; a 37% decrease from current use levels. Implement AMPs on 9 Category I Allotments.	Initially license at existing use level (305,247) AUMs). There would be no initial change in active preference. Modify available AUMs to 402,096, a 32% increase, if monitoring supports. Implement AMPs on 22 Category I Allotments and six Category M Allotments.	Eliminate all livestock grazing from public lands.
Wildlife Habitat	Continue management for existing big game use - estimated at 17,258 AUMs for mule deer, 608 AUMs for antelope. Maintain crucial habitat.	Manage for existing numbers of big game (see Alternative A). Construct new projects in crucial wildlife habitat.	Manage for reasonable numbers of big game - 34,513 AUMs for mule deer, 1,215 AUMs for antelope, and 140 AUMs for reestablishment of bighorn sheep. Construct wildlife projects to improve all habitat.	See Alternative C	Manage habitat for increased numbers of big game beyond reasonable numbers (80,000-100,000 AUMs).
	Continue management on 11 miles (330 ac.) of riparian/stream	Manage 52 miles (1,560 ac.) of riparian/stream habitat for T&E species.	Manage 191 miles (5,730 ac.) of riparian/stream habitat for 30% improvement.	Manage 117 miles (3,480 ac.) of riparian/stream habitat for 30% improvement.	

SUMMARY TABLE 1
MANAGEMENT ACTIONS

ISSUE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D (Proposed)	ALTERNATIVE E
Wild Horses	Continue management for 330 horses in four herd areas.	Reduce horses by 33% to to 220 head.	Increase horses by 100% to 660 head in four herd areas.	Manage for current numbers (330 horses) in four herd areas.	See Alternative C
Woodland Products	Continue to issue permits for harvest on a case-by-case basis.	Intensively manage 23,000 ac. for Christmas tree harvest; 74,000 ac. for fuelwood and post harvest.	Intensively manage 14,000 ac. for Christmas tree harvest; 43,000 ac. for fuelwood and post harvest.	Intensively manage 23,000 ac. for Christmas tree harvest; 60,000 ac. of woodlands for fuelwood and post harvest.	See Alternative C
Minerals	Maintain entire RMP area open for locatable minerals except for an 11 ac. administrative withdrawal.	Maintain RMP area open for locatable minerals except 47,022 ac. (1.5% of RMP area) for WSAs and administrative withdrawal.	Maintain RMP area open for locatable minerals except for 85,390 ac. (2.7% RMP area) for WSAs and administrative withdrawal.	Maintain RMP area open for locatable minerals except for 50,096 ac. (1.8% of RMP area) for WSAs and administrative withdrawal.	See Alternative C
	Provide for oil/gas leasing as follows: Limited - subject to NSO[3] 1% RMP area (33,001 ac.). Limited - subject to seasonal restrictions 5% of RMP area (181,370 ac.) Open - subject to standard leasing stipulations 93.3% of RMP area (2,922,464 ac.)	Provide for oil/gas leasing as follows: Limited - subject to NSO 0.4% RMP area (11,092 ac.). Open - subject to standard leasing stipulations 98.1% RMP area (3,075,905 acres). Closed - 1.5% of RMP area (47,022 ac.).	Provide for oil/gas leasing as follows: Limited - Subject to NSO 1.2% RMP area (36,872 ac.). Limited - Subject to seasonal restriction 28% of RMP area (877,525 ac.). Closed - 2.7% RMP area (85,390 ac.).	Provide for oil/gas leasing as follows: Limited - Subject to NSO 1.2% RMP area (36,872 ac.). Limited - Subject to seasonal restriction 15% RMP area (470,714 ac.). Open - Subject to standard leasing stipulations 82% of RMP area (2,571,337 ac.) Closed - 1.8% RMP area (55,096 ac.).	

3/ No surface occupancy.

SUMMARY TABLE 2
COMPARATIVE RESOURCE IMPACT SUMMARY

Environmental Component	Alternative A	Alternative B	Alternative C	Alternative D (Proposed)	Alternative E
Recreation					
Projected Recreation					
Days-total	1,436,000	1,252,200	2,033,400	1,728,600	2,118,800
Hunting	144,300	119,000	210,800	174,600	223,000
Fishing	288,900	238,500	421,900	350,000	447,100
Off-road Vehicles	94,200	137,600	77,800	103,600	77,800
ORV Use (%)					
Open	100	98(-2%)	97(-3%)	98(-2%)	97(-3%)
Limited	0	2(+2%)	3(+3%)	2+2%)	3(+3%)
Wilderness	Wilderness values would not be protected on existing WSAs.	Wilderness values would be protected on less than 1% of the planning area.	Wilderness values would be protected on all areas currently under study, 2.1% of the planning area.	Wilderness values would be protected on 1% of the planning area.	Wilderness values would be protected on all areas currently under study, 2.1% of the planning area.
Livestock					
Use goal compared to existing use level	Initial and long-term stocking level would maintain livestock grazing at the existing use level (305,247 AUMs).	Initial stocking level would be at the existing use level and the long-term stocking goal would be 491,741 AUMs (+61%). Up to 7,442 AUMs could be lost due to potential land sales.	Initial stocking rates would be at the existing use level and the long-term stocking goal would be 193,767 (-37%). No loss in AUMs would occur due to land sales.	Initial stocking level would be at the existing use level and the long-term stocking goal would be 402,096 AUMs (+32%). No initial change in existing preference would occur until supported by monitoring data. Up to 93 AUMs could be lost due to potential land sales.	No livestock grazing would occur under this alternative.

SUMMARY TABLE 2 (Cont.)
COMPARATIVE RESOURCE IMPACT SUMMARY

Environmental Component	Alternative A	Alternative B	Alternative C	Alternative D (Proposed)	Alternative E
Wildlife Habitat					
Terrestrial	Existing numbers of big game would be impaired. NDOW[1] proposed reestablishments could not be accommodated.	Existing numbers of big game would be provided for over the long-term.	Habitat to support reasonable numbers of big game would be provided over the long-term. NDOW proposed reestablishments would be accommodated.	Habitat to support reasonable numbers of big game would be provided over the long-term. Monitoring would be implemented. NDOW proposed reestablishments would be accommodated.	Habitat to support an excess of reasonable numbers of big game would be provided over the long-term.
	Sage grouse populations would decline.	Sage grouse populations would be maintained over the long-term.	Sage grouse populations would increase.	Sage grouse populations would increase.	Sage grouse populations would increase.
Riparian/Fisheries	Existing threatened species habitat would not be protected in accordance with the Endangered Species Act, 1973 as amended. Efforts to have Lahontan cutthroat trout removed from the list would be delayed indefinitely.	Habitat for threatened and priority species would improve on 42 miles of stream.	Habitat for threatened and priority species would improve on 181 miles of stream.	Habitat for threatened and priority species would improve on 106 miles of stream.	Habitat for threatened and priority species on 201 miles of stream.
Aquatic Streamside Habitat					
Condition (Miles)					
Excellent	0	0	17	7	37
Good	11	53	175	110	175
Fair	26	26	5	14	0
Poor	175	133	15	81	0

1/ Nevada Department of Wildlife

COMPARATIVE RESOURCE IMPACT SUMMARY

Environmental Component	Alternative A	Alternative B	Alternative C	Alternative D (Proposed)	Alternative E
Wild Horses	Herd numbers would not change. The free roaming characteristic of wild horses would not be affected. The condition of wild horses would not be improved through additional water developments.	Herd numbers would be reduced in two herd areas. The free roaming characteristic of wild horses would be adversely impacted due to the increased level of fencing. The condition of wild horses would improve due to the increase in water availability.	Herd numbers would increase by 100 percent in all herd areas. The free roaming characteristic of wild horses would not be affected. The condition of wild horse would improve due to increased availability of water. Monitoring would be implemented.	No change in wild horse numbers is expected. The free roaming characteristic of wild horses would not be affected. The condition of wild horse would improve due to increase availability of water. Monitoring would be implemented.	Herd numbers would increase by 100 percent in all herd areas. The free roaming characteristic of wild horses would not be affected. Increase availability of water would improve wild horse condition.
Woodland Products	Harvest levels would remain static or decrease on 52,000 acres. The demand for fuelwood would not be met. Overall stand condition would remain static or decrease.	Harvest levels would increase on 74,000 acres. The full allowable cut would help meet demands for fuelwood. Trend of stand condition would improve.	Harvest levels would remain static or decrease on 43,000 acres. The demand for fuelwood and Christmas trees would not be met. Trend of stand condition would improve.	Harvest levels would increase on 60,000 acres. The full allowable cut on these acres would help to nearly meet projected demands. Trend of stand condition would improve.	Harvest levels would remain static or decrease on 43,000 acres. The demand for fuelwood and Christmas trees would not be met. Trend of stand condition would improve.
Minerals					
Locatable Minerals					
Open	100.0%	98.5%	97.3%	98.2%	97.3%
Closed	0.0%	1.5%	2.7%	1.8%	2.7%
Leasable Minerals					
Open	93.3%	98.1%	68.1%	82.0%	68.1%
Seasonal Restrictions	5.7%	0.0%	28.0%	15.0%	28.0%
No Surface Occupancy	1.0%	0.4%	1.2%	1.2%	1.2%
Closed	0.0%	1.5%	2.7%	1.8%	2.7%

SUMMARY TABLE 3

RANGELAND IMPROVEMENT PROJECTS BY ALTERNATIVE
FOR THE ELKO PLANNING AREA 1/

Livestock	Alternative B		Alternative C		Alternative D		Alternative E	
Culvert					1	2,000		
Wells (Each)	50	$ 300,000		---	28	$ 168,000		---
Pipelines (Miles)	187	748,000	83	$ 332,000	132	528,000		---
Water Storage Tanks (Each)	25	50,000	13	26,000	24	48,000		---
Spring Developments (Each)	139	417,000	81	243,000	97	291,000		---
Fences (Miles)	405	972,000	256	614,400	258	619,200		---
Cattleguards (Each)	71	177,500	29	72,500	37	92,500		---
Land Treatment (Acres)	635,003	10,112,280		---	120,978	2,179,405		---
Reservoir (Each)	243	1,944,000	123	984,000	97	776,000		---
SUBTOTAL		$14,720,780		$2,271,900		$4,704,105		
Wild Horses/Burros								
Water Developments	2/		3	$ 30,000	2	$ 20,000	2/	---
Wildlife								
Guzzlers (Each)	5	$ 10,000	20	$ 40,000	20	$ 40,000	5	$ 10,000
Spring Protection (Each)	7	35,000	10	20,000	40	20,000		---
Vegetation Treatments (Acres)		---		---	500	30,000	200	12,000
Water Developments (Each)	40	80,000	12	24,000	40	80,000	40	80,000
Fence Modification (Miles)	5	5,000	10	10,000	20	20,000	10	10,000
Fences (Miles)	86	206,400	353	847,200	189	453,600		---
SUBTOTAL		$ 336,400		$ 941,200		$643,600		$112,000
TOTAL COST		$15,057,180		$3,243,100		$5,347,705		$112,000

1/ These improvements will be designed to benefit all uses. The categories used here are only to indicate the primary benefiting use.

2/ No specific improvements currently planned.

CHAPTER ONE

CHAPTER ONE

PURPOSE AND NEED

The purpose of a Resource Management Plan (RMP) is to provide a framework to ensure that public lands are managed in accordance with the principles of multiple-use and sustained-yield. The RMP is prepared under the authority of Sections 201 and 202 of the Federal Land Management and Policy Act of 1976 (FLPMA) which requires that the Secretary of the Interior shall, with public involvement, develop land use plans which provide for the use of public lands.

The National Environmental Policy Act of 1969 (NEPA) requires agencies to prepare an Environmental Impact Statement (EIS) documenting environmental consequences of significant Federal actions affecting the human environment. This RMP includes such an EIS, prepared pursuant to Council on Environmental Quality Regulations for implementation of NEPA.

The RMP is a comprehensive land use plan that establishes land areas for limited, restricted, designated, or exclusive uses within the planning area. It is not intended to make program decisions for individual resource elements, but to provide the overall multiple-use objectives and management direction for the planning area. It identifies allowable resource uses and related levels of production or use to be maintained, resource condition goals, program constraints, and general management practices needed to achieve these objectives.

In addition to meeting the planning needs for the Elko Resource Area, the RMP also fulfills three other specific objectives. The first objective is to meet the requirements of the court ordered agreement between the Bureau of Land Management (BLM) and the Natural Resources Defense Council, which responded to litigation filed in 1973. As a result of the settlement of this suit, BLM is preparing environmental analyses of grazing programs according to an agreed-upon schedule. The RMP will meet this objective.

Secondly, the Draft RMP/EIS included the study of four Wilderness Study Areas (WSAs) as required by FLPMA. In accordance with BLM policy, environmental concerns pertaining to wilderness designation were discussed (USDI, BLM 1982). Environmental impacts of wilderness designation is incorporated into the planning process through the Draft RMP stage. The draft document presents the impacts to wilderness and other resources by alternative. Comments received on wilderness from the draft document will be presented in a Preliminary Wilderness Final published as a separate document from the Final RMP. The Final Wilderness EIS will be submitted through the BLM Director and the Secretary of the Interior to the President. The recommendations contained in the Final Wilderness EIS will be preliminary, subject to change during administrative review. Since Congress has the sole authority for designating any Federal land as wilderness, Congress will evaluate the recommendations submitted by the Secretary of Interior through the

President, and either reject or approve legislation formally designating areas as wilderness (USDI, BLM 1982).

Two other WSAs are located within the boundaries of the planning area. Their wilderness suitability was analyzed in the Draft Owyhee Canyonlands Wilderness EIS published in February 1984. This RMP will not repeat wilderness analysis included in the Canyonlands EIS, but will evaluate the impacts to the proposed 18,625 acre South Fork of the Owyhee River Special Recreation Management Area.

Finally, the Proposed RMP will update land use planning guidance contained in two existing Management Framework Plans. The decision in these plans have been carried forward into this RMP where applicable. The decisions in this RMP will supercede the decisions in the two existing Management Framework Plans dealing with the issues identified.

The Draft RMP/EIS will be used as a tiered environmental document, one that can be used as a reference for subsequent environmental analyses. Following approval of the Elko Resource Management Plan, future activity planning and project implementation will follow the land use objectives and management actions outlined in the RMP. More intensive environmental assessments covering activity plans and local project work will include site specific details as appropriate.

LOCATION OF THE PLANNING AREA

The Elko RMP area encompasses all of the Elko Resource Area of the Elko District, located in northeastern Nevada. The area is comprised of 5,967,854 acres of land primarily within Elko County, with smaller portions in Lander and Eureka counties. Of this total land area, BLM administers 3,134,019 acres or approximately 52 percent of the planning area. Approximately 2,121,519 acres or 35 percent of the planning area is privately owned. The Bureau of Reclamation administers about 26,690 acres for watershed management. The Bureau of Indian Affairs manages 145,737 acres for irrigation purposes. Approximately 16,940 acres are Native American lands.

The Elko RMP Area is bounded on the north by the Idaho border and the Humboldt National Forest, Mountain City Ranger District, United States Forest Service (USFS); on the west by the Winnemucca District (BLM); on the south by the Battle Mountain and Ely Districts (BLM); and to the east by the Humboldt National Forest, Ruby Mountain Ranger District (USFS), and the Wells Resource Area (BLM). The RMP Area Map shows the location and boundaries of the planning area.

THE PLANNING PROCESS

The Bureau planning process has been designed to accommodate the issues and concerns of the public, while complying with the laws and policies established by Congress and the Department of Interior. The process includes nine mandated steps as established in 43 CFR 1600. These steps are described as follows:

1. Issue Identification. The issues are the problems, concerns, or opportunities identified by the public and BLM at the beginning of the planning process. By identifying and focusing on the issues, the scope and direction of the plan is established. In this step BLM asked the public to identify land management issues and resource management opportunities for the planning area. Letters requesting information on what should be considered as issues were sent to

approximately 500 individuals, groups, and organizations that had expressed interest in planning for the Elko District. Thirty-seven responses to this letter were received. Other information on resource management issues was obtained through voluntary comments from representatives of companies, interest groups, state and local government, livestock permittees, and other Federal agencies. Also, management concerns were identified by BLM staff and managers. From this, ten issues were formed as presented in this document.

2. Development of Planning Criteria. Planning criteria are developed to set standards and guidelines for land use planning. They are designed to ensure that the RMP is confined to the established issues and to eliminate unnecessary data collection and analyses. The Draft Elko RMP Planning Criteria and Issues were distributed for public review and comment in April 1984. Approximately 450 copies were sent to interested individuals, groups, and organizations. A total of 19 comments were received.

3. Inventory Data and Information Collection. Public land resources were inventoried to establish a data base upon which to develop a resource management plan and analyze the impacts expected from the various alternatives. Vegetation, wildlife (including riparian resources), forestry, and wild horse inventories were among those conducted. Information was obtained from the Nevada Department of Wildlife on various wildlife species.

4. Analysis of the Management Situation. In this step, the inventory data to define the existing situation, assess public demand for public land resources, and predict the ability of these resources to meet that demand are accumulated and analyzed. Opportunities were identified to meet these demands and resolve potential resource conflicts. This represents an intermediate stage which is prepatory to the next step, Formulation of Alternatives.

5. Formulation of Alternatives. At this point, BLM formulated a range of options for managing resources. These options ranged from emphasis on production of commercial goods to protection of unique or fragile resources. Public comment was sought during this phase from approximately 500 individuals and groups including specific involvement of the livestock permittees in developing the level of range improvements in Alternative B.

6. Estimation of Effects of Alternatives. At this stage the biological, physical, economic, and social impacts of implementing each alternative was predicted and described in Chapter Four of the Draft RMP/EIS.

7. Selection of Preferred Alternative. Based on the management options presented in the alternatives and the potential impacts of each, management selected the combination of options that was the most acceptable resolution of the planning issues. Once the preferred alternative was determined, a draft plan and environmental impact statement were prepared and released for a 90 day public review and comment

period. The preferred alternative is described in Chapter Two and the environmental consequences of this alternative are discussed in Chapter Four of the draft RMP.

8. Selection of the Resource Management Plan. At this step the District Manager reviews the comments received on the Draft RMP/EIS. After evaluation of all available information, the manager recommends a proposed resource management plan and prints it along with a final EIS. The document is submitted to the Governor of Nevada for a 60-day review to determine consistency with state planning. The proposed plan and final environmental impact statement are then filed with the Environmental Protection Agency and sent to the public.

9. Monitoring and Evaluation. Following approval of the resource management plan implementation will occur, subject to funding capabilities. Collection and analysis of data will be accomplished to determine if the plan is achieving the desired results. The plan will be reviewed periodically (a minimum of five years) to determine the need for amendment.

PLANNING ISSUES

Issues drive RMPs and indicate specific concerns the BLM or the public may have regarding the planning area. An issue is defined as an opportunity, conflict, or problem regarding the management of public lands and associated resources. Issue-driven planning means that those aspects of current resource management felt to be a concern are examined by being carried through the formulation and analysis of alternatives. Alternatives are not developed for those aspects of current resource management felt to be satisfactory.

Ten issues are addressed in this document were identified through consultation with the public, other Federal agencies, and BLM personnel.

An area of concern not identified as an issue was fire management. Therefore, this RMP/EIS does not contain specific fire management determination. Those determinations will be made in the subsequent activity level of planning following publication of the Record of Decision on this RMP/EIS.

Issue: Lands and Realty

Requests have been made by the public to identify lands suitable for disposal through sales, exchanges, and applications under the Recreation and Public Purposes Act within the Elko Planning Area. Those portions need to be identified where land ownership adjustments are needed to achieve more efficient management and use of public resources.

The issue involves the determination of which lands should be identified for disposal or retention.

Issue: Corridors

The opportunity exists for formal designation of utility corridors under the authority of Section 503 of FLPMA and in consultation with the Western Regional Corridor Study (Western Utility Group, 1980). Such designation could serve to minimize width requirements for rights-of-way and maximize multiple occupancy.

Issue: Access

Legal access is defined as the lawful right to enter or leave a parcel of land. It includes the right to enter

public lands adjacent to existing public roads or trails, as well as from roads or trails that cross private property to public lands. Neither BLM nor the public has an inherent right of legal access to public lands over private property. Needs have been expressed by the public and public land managers for access to augment management of public resources. As populations and the desire to use public land resources increase, additional access problems are expected.

Issue: Recreation

The Elko Planning Area offers a variety of recreation opportunities and is used increasingly for recreation by both local communities and nonlocal sources. The nearest metropolitan areas of Salt Lake City, Reno, and Las Vegas are expected to continue their population growth, creating the potential of greater recreational demands within the RMP area. The issue involves the determination of the number and amount of acres to be designated for recreation use, including those areas where off-road vehicle use is proposed for limited or closed designations.

Issue: Wilderness

Section 603 of FLPMA directs the Secretary of the Interior to review roadless areas of 5,000 acres or more identified as having wilderness characteristics, and to report to the President on their suitability or nonsuitability for wilderness designation. The Secretary is also directed to cause mineral surveys to be conducted by the U.S. Geological Survey and the Bureau of Mines to determine the mineral values, if any, in suitable areas. The Secretary is further directed to manage lands under review in a manner that will not impair their suitability for wilderness designation, as set forth in BLM's Interim Management Policy. Within the Elko Planning Area the issue involves the amount of acreage within four wilderness study areas to be recommended as suitable for wilderness designation and included in the National Wilderness Preservation System or recommended as nonsuitable and returned to other forms of multiple-use management, including mining and woodland product harvest activities.

Issue: Livestock

As a result of a 1973 Federal court suit, the BLM has been directed to prepare an environmental impact statement (EIS) to analyze the potential impacts of alternative grazing programs. This EIS requirement is integrated into the Resource Management Planning process. The issue involves the determination of selective management categorization for each allotment and which allotments will require further activity planning, such as allotment management plans, and what priorities will be used for implementation.

Issue: Wildlife Habitat

Terrestrial

In compliance with the principles of multiple-use, the BLM is charged with the protection and enhancement of wildlife habitat. Competition for habitat components (forage, water and cover) exists between wildlife and other resource uses, e.g. mining, livestock, and woodland products, in some portions of the Elko RMP Area. This issue involves the determination of what areas of public land will be made available to big game and sage grouse.

Riparian

Aquatic and riparian habitats constitute less than one percent of

the total land area administered within the RMP area, however, they are the most productive in terms of plant and wildlife diversity. They are also areas where competition exists among various resources including wildlife, mining, and livestock. As required by Executive Orders 11988 and 11990, management actions within floodplains and wetlands are to include measures to preserve, protect and, if necessary, restore their natural condition. The issue involves the determination of what objectives should be established for riparian habitat areas.

Issue: Wild Horses

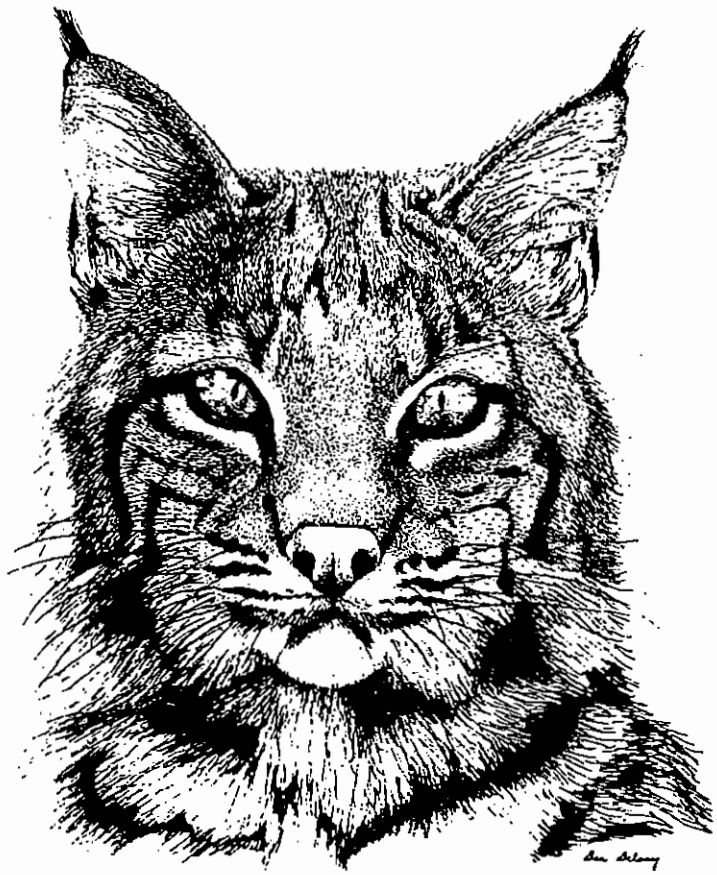
Wild horse management is governed by the Wild and Free Roaming Horse and Burro Act of December 15, 1971. The purpose of the Act is to ensure the preservation of a unique feature of our Western heritage, as well as to prevent undue competition among wild horses, livestock, and big game. The issue involves the determination of what areas will be designated as herd management units and how many wild horses will be maintained within designated herd units.

Issue: Woodland Products

Increasing public demand has made it necessary to develop a management program that will maintain or improve the supply of woodland products, i.e. firewood, posts, pinenuts and Christmas trees. The issue involves the determination of what areas will be made available for the harvest of woodland products within the RMP area.

Issue: Minerals

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



CHAPTER TWO

THE PROPOSED RESOURCE MANAGEMENT PLAN

The Proposed Resource Management Plan emphasizes a balanced approach to land management for the Elko Planning Area. It is the result of a process which began in October, 1983, with the Issue Identification phase. Public involvement, as documented in Chapter Four, has been included throughout the process.

The Proposed RMP is similar to the Preferred Alternative in the Draft RMP/EIS, with the following change in use level: the projected use level for livestock is 402,096 AUMs and the projected AUM level necessary for reasonable numbers of mule deer is 34,513. The following sections outline the management actions and procedures for the issues covered in this document.

ISSUE 1. LANDS

Objective: Allow disposals, land tenure adjustments, and land use authorizations to accommodate the overall goal of this alternative.

Short and Long-Term Management Actions:

1. Make available, primarily through sale, up to 5,900 acres of public land to meet community expansion needs (Land Tenure Adjustments and Corridor Map).

2. Make available, primarily by sale, up to 8,340 acres of public lands that are difficult and uneconomic to manage.

3. Identify for transfer, primarily through exchange, 243,200 acres.

ISSUE 2: CORRIDORS

Objective: Identify designated corridors and planning corridors in coordination with other multiple-use objectives.

Short and Long-Term Management Actions:

1. Designate 243 miles of right-of-way corridors. This includes 109 miles of low visibility corridor designation along Interstate 80. Future facilities within this low visibility corridor would be accommodated if the facility were not evident in the characteristic landscape (Land Tenure Adjustments and Corridor Map). Projects will not be authorized within segment R-C until completion of an Idaho BLM Statewide Corridor EIS and if projects are compatible with a route identified in the Record of Decision for the Idaho BLM Statewide Corridor EIS.

2. Identify 130 miles of planning corridors for future facilities.

ISSUE 3: ACCESS

Objective: Initiate procedures to acquire legal access for routes which would enhance opportunities to use public resources and provide for public land administration.

Long-Term Management Action: Acquire legal access for 60 roads (242 miles) considered high priority for management of all resources (Table 2-1).

ISSUE 4: RECREATION

Objective: Provide a wide range of recreation opportunities.

TABLE 2-1
PROPOSED RMP - LEGAL ACCESS

Resources	Number of Roads	Percent	Miles of Roads	Percent
Wilderness	1	2	7	3
Range	22	36	94	38
Recreation	3	5	13	5
Woodland	5	8	12	5
Minerals	3	5	14	6
Other Government	5	8	29	12
Range/Woodland	7	11	23	10
Wilderness/ Range/ Recreation/Woodland	1	2	5	2
Range/Recreation	4	7	19	8
Wilderness/Range/ Recreation	2	3	10	4
Recreation/Wildlife	1	2	1	1
Range/Wildlife	1	2	3	1
Wilderness/Recreation	1	2	1	1
Recreation/Woodland	1	2	2	1
Range/Recreation/ Other Government	2	3	4	2
Wildlife/Other Government	1	2	5	2
	60	100%	242	100%

ROAD NUMBERS (Refer to Access Roads Map)

1000, 1009, 1020, 1030, 1033, 1035, 1041, 1042, 1045, 1047, 1053, 1059, 1066, 1069, 1072, 1092, 1095, 1103, 1112, 1113, 1114, 1116, 1117, 1119, 1126, 1127, 1128, 1129, 1130, 1138, 1140, 1200, 1219, 1224, 1225, 1227, 1229, 1230, 1239, 1247, 1250, 1251, 1254, 1263, 1264, 1265, 1287, 1297, A, B, C, E, G, I, J, K, L, M, N.

Short and Long-Term Management Actions:

1. Maintain three existing SRMAs: the South Fork of the Owyhee River for sport and commercial river recreation (3,500 acres, the rim-to-rim portion); Wilson Reservoir (5,440 acres), and Zunino/Jiggs Reservoir (800 acres) for camping and water based recreation (Special Recreation Management Areas Map).

2. Designate the South Fork of the Humboldt River (3,360 acres) as an SRMA for water based recreation uses (Special Recreation Management Areas Map).

3. Designate the Wildhorse Special Recreation Management Area (5,760 acres) for camping and water based recreation. This area would include both the North and West Wildhorse SRMAs as well as lands for dispersed recreation use.

4. Manage the remainder of the planning area for dispersed recreation activities.

5. Make the following ORV designations: 3,060,074 acres open (98 percent of the planning area) and the remaining area limited to designated roads and trails - 73,945 acres; composed of SRMAs and preliminarily suitable portions of WSAs, including 18,625 acres addressed in the Draft Owyhee Canyonlands Wilderness EIS.

ISSUE 5: WILDERNESS

Objective: Manage as wilderness those portions of the WSAs that are manageable as wilderness and where wilderness values are capable of balancing other resource values and uses which would be forgone.

Short and Long-Term Management Actions:

1. Recommend the entire Rough Hills WSA (6,685 acres) and a portion of the Little Humboldt River WSA (29,775 acres) as preliminarily suitable for wilderness designation (1.2 percent of RMP area).

2. Recommend the Cedar Ridge and Red Spring WSAs and a portion of the Little Humboldt River WSA, totaling 30,294 acres, as nonsuitable for wilderness designation.

WSA	Suitable Acres	Nonsuitable Acres
Rough Hills	6,685	0
Little Humboldt River	29,775	12,438
Cedar Ridge	0	10,009
Red Spring	0	7,847
TOTAL	36,460	30,294

ISSUE 6: LIVESTOCK

Objective: Maintain or improve the condition of the public rangelands to enhance productivity for all rangeland values.

Short and Long-Term Management Actions:

1. Initially license livestock use at the three to five year (1979-1983) average licensed use level of 305,247 AUMs. Over the long-term increase the availability of livestock AUMs to 402,096 AUMs, a four percent increase over active preference and 32 percent over the three to five year average licensed use level.

   There would be no change in active preference unless adequately supported by monitoring.

2. Treat or seed 120,978 acres to provide additional livestock forage and reduce the grazing pressure on adjacent areas.

3. Construct 258 miles of fence; drill 28 wells; lay 132 miles of pipeline; install 24 storage tanks, 97 spring developments, and 97 reservoirs to improve livestock distribution and utilization of vegetation (Table 2-2).

4. Develop and implement AMPs on 22 Category I allotments and six Category M allotments to allow for natural improvement of range condition while considering multiple-use values and increasing livestock carrying capacity.

5. Implement a rangeland monitoring program to determine if management objectives are being met and adjust grazing management systems and livestock numbers as required.

ISSUE 7: WILDLIFE HABITAT

Objective: Conserve and enhance terrestrial, riparian and aquatic wildlife habitat.

Short and Long-Term Management Actions:

1. Manage wildlife habitat to provide 34,513 AUMs of forage for mule deer, 1,215 AUMs for pronghorn antelope, and 140 AUMs for bighorn sheep.

2. Construct 20 guzzlers, 40 spring protection facilities, 40 water developments, and 189 miles of fencing to improve habitat and management for wildlife. Implement 500 acres of vegetation treatment and modify 20 miles of fence within crucial big game habitat.

3. Monitor the interaction between wildlife habitat condition and other resource uses and make adjustments in season-of-use for livestock to improve or maintain essential and crucial wildlife habitats.

4. Jointly evaluate and analyze availability and condition of habitat areas identified by the Nevada Department of Wildlife for the reestablishment, argmentation, reintroduction, or introduction of bighorn sheep and other wildlife species. Accommodate these plans through cooperative agreements, if feasible.

5. Apply restrictions on leasable and/or salable mineral developments to protect crucial deer winter range, sage grouse strutting and nesting habitats, and antelope kidding areas.

6. Manage 117 miles (3,480 acres) of high priority riparian/stream habitat to provide good habitat condition for wildlife and fish. Techniques which would result in a minimum improvement of 30 percent in habitat condition in the short-term from the date of implementation would be used.

ISSUE 8: WILD HORSES

Objective: Manage wild horse populations in their current herd areas consistent with other resource uses.

Short and Long-Term Management Actions:

1. Manage the four wild horse herd areas with a target population of 330 horses.

TABLE 2-2
POTENTIAL RANGELAND IMPROVEMENT PROJECTS
FOR THE PROPOSED PLAN

Livestock		
Culvert	1	$ 2,000
Wells (Each)	28	168,000
Pipelines (Miles)	132	528,000
Water Storage Tanks (Each)	24	48,000
Spring Developments (Each)	97	291,000
Fences (Miles)	258	619,200
Cattleguards (Each)	37	92,500
Land Treatment (Acres)	120,978	2,179,405
Reservoir (Each)	97	776,000
SUBTOTAL		$4,704,105
Wild Horses/Burros		
Water Developments (Each)	2	$ 20,000
Wildlife		
Guzzlers (Each)	20	$ 40,000
Spring Protection (Each)	40	20,000
Vegetation Treatments (Each)	500	30,000
Water Developments (Each)	40	80,000
Fence Modification (Miles)	20	20,000
Fences (Miles)	189	453,600
SUBTOTAL		$643,600
TOTAL COST		$5,367,705

2. Monitor wild horse populations and habitat conditions.

3. Construct two water development projects (catchment type) each with a storage tank and trough (Table 2-2).

4. Conduct wild horse gatherings as needed to maintain numbers.

ISSUE 9: WOODLAND PRODUCTS

Objective: Manage woodland areas to provide as wide a variety of products and services as possible to both the general public and commercial users.

Short and Long-Term Management Actions:

1. Implement intensive management of Christmas tree cutting on approximately 23,000 acres of woodlands.

2. Manage fuelwood harvesting to allocate the full allowable cut on approximately 60,000 acres. Additional live fuelwood harvesting areas would be opened as needed.

3. Provide for commercial pine nut sales in years when pine nuts are abundant.

ISSUE 10: MINERALS

Objective: Maintain public lands open for exploration, development, and production of mineral resources while mitigating conflicts with wildlife, wild horses, recreation, and wilderness resources.

Short and Long-Term Management Actions:

1. Designate the resource area open to mineral entry for locatable minerals, except for 55,096 acres (1.8 percent of RMP area) consisting of areas preliminarily suitable for wilderness designation, including 18,625 acres addressed in the Draft Owyhee Canyonlands Wilderness EIS and an 11 acre administrative site.

2. Provide for oil/gas and geothermal leasing as follows:

a) Designation: Limited - subject to no surface occupancy. Purpose: Protection of SRMAs and sage grouse strutting grounds. No surface occupancy would apply to areas within one-half mile of the high water line around Wilson, Zunino/Jiggs, Wildhorse, South Fork of the Owyhee Canyon, and Rock Creek and South Fork Reservoirs (Special Recreation Management Area Map). Acres: 36,872 (1.2 percent of RMP area; 11,092 - SRMAs and 25,780 - sage grouse strutting grounds).

b) Designation: Limited - Subject to seasonal restriction. Purpose: Protect crucial deer winter range, crucial antelope yearlong habitat, and sage grouse brood rearing areas (Antelope and Mule Deer Habitat Map). Acres: 470,714 (15 percent of RMP area).

c) Designation: Open - subject to standard leasing stipulations. Acres: 2,571,337 (82 percent of RMP area).

d) Designation: Closed. Purpose: Areas recommended as preliminarily suitable for wilderness designation, including 18,625 acres addressed in the Draft Owyhee Canyonlands Wilderness EIS and an 11 acre administrative withdrawal. Acres: 55,096 acres (1.8 percent of RMP area).

IMPLEMENTATION OF THE RESOURCE MANAGEMENT PLAN

The resource management plan will generally be implemented through activity plans. These are detailed, site-specific management actions outlined in livestock allotment management plans, wildlife habitat management plans, wild horse herd area management plans, and wilderness management plans among others. These plans are multiple-use in nature, and include such actions as range improvements and grazing systems. Monitoring will be used to ensure that plans meet objectives.

PLAN MONITORING

Monitoring will include not only the resource monitoring described above, but also monitoring of the RMP itself. At intervals not to exceed five years, the management actions will be analyzed for consistency with plans adopted by local, state, and other federal agencies and Indian tribes; new data will be analyzed to determine its significance to the plan.

Monitoring activities include plan maintenance. This involves posting new information and refining the analysis. Maintenance does not extend the scope or level of resource uses, or change uses or restrictions from those prescribed in the approved RMP.

Future proposals or actions that are not in conformance with the RMP, but which warrant further consideration prior to a complete plan revision, will be considered through the plan amendment process. These amendments follow a similar process as the RMP but are generally limited to one or two issues and do not require preparation of an EIS if impacts are insignificant.

The RMP will be completely revised when plan monitoring indicates that maintenance of the plan and amendments to the plan are inadequate to keep the plan current with changing circumstances, resource conditions, or policies. All the requirements for preparing and approving an original RMP are followed.

SUPPORT REQUIREMENTS

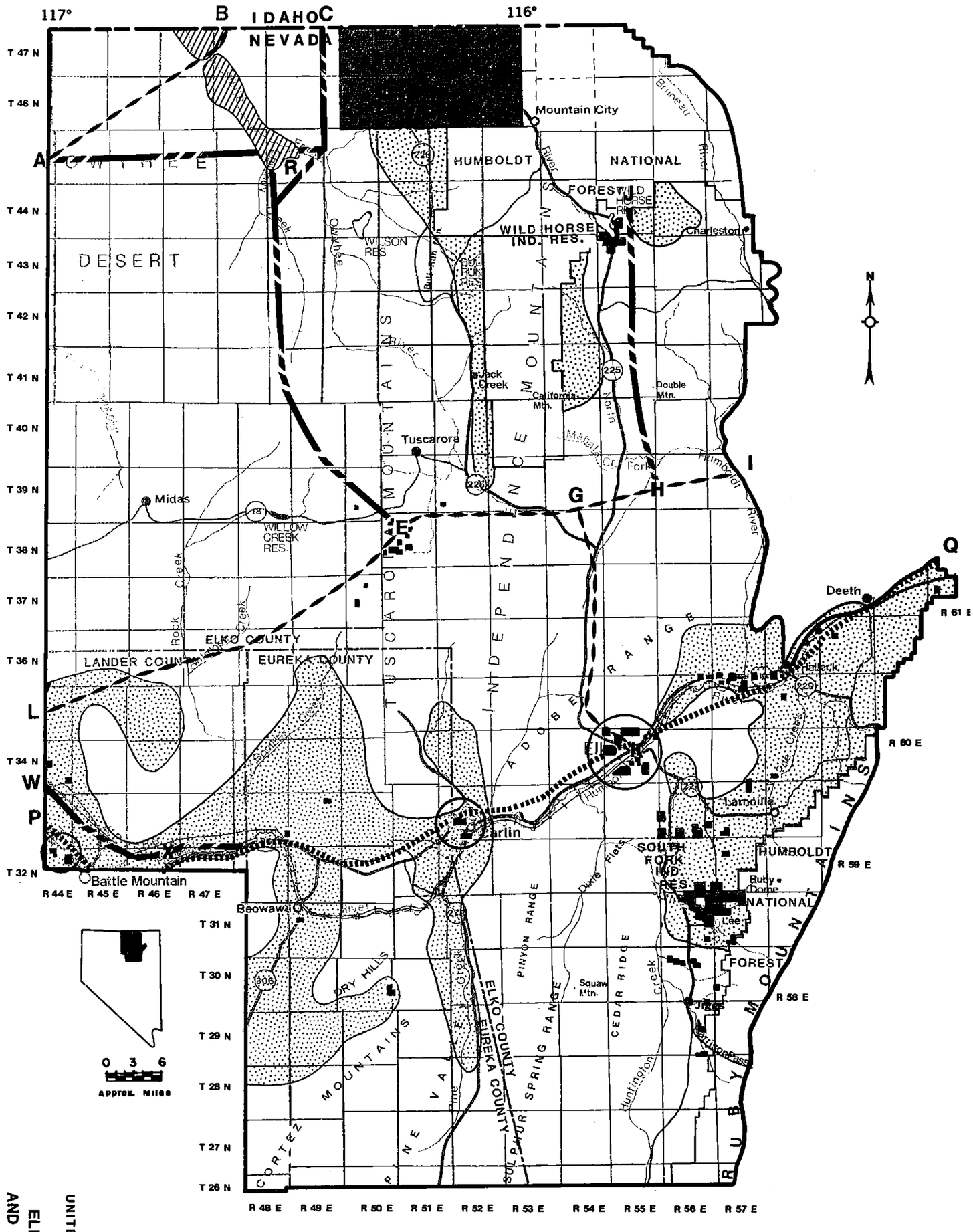
Support requirements such as cadastral survey, engineering design, additional inventories, etc., will be determined during the activity planning phase when more specific proposals are available.

CONSISTENCY DETERMINATIONS

As part of the Management Situation Analysis the policies, plans, and programs of other federal agencies, state and local governments, and Indian tribes were reviewed. No conflicts between those policies, plans, or programs and the proposed RMP have been identified by BLM staff. Federal agencies, state and local governments, and Indian tribes have been given the opportunity to identify any conflicts during the public review process as outlined in Chapter Five of the Draft RMP/EIS.

The selection of the final resource management plan will take place after publication of the final environmental impact statement.

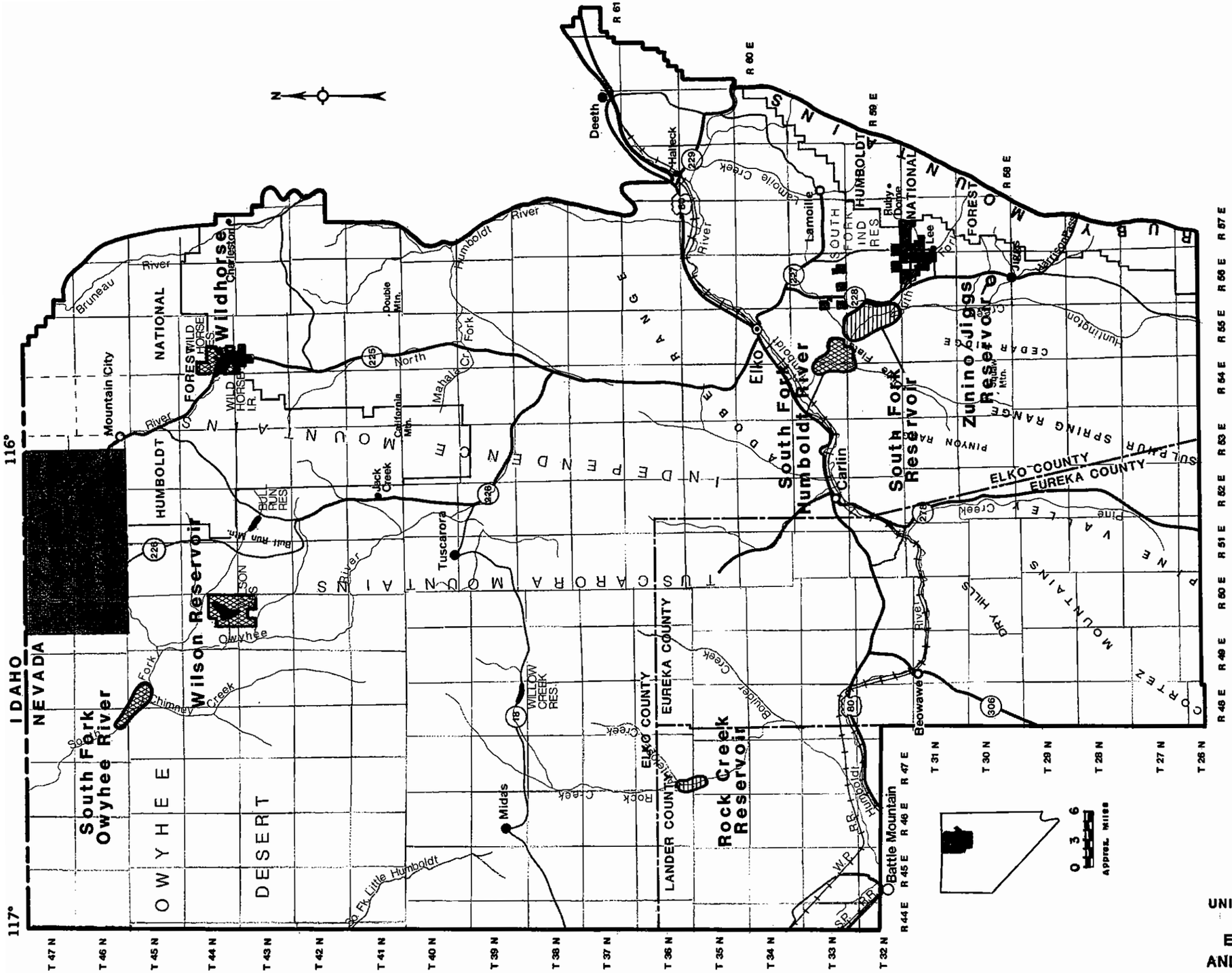
A Rangeland Program Summary will be issued after completion of the RMP to inform livestock permittees and interested publics about the implementation of the rangeland management program. It will identify allotment specific objectives for livestock, wildlife, and wild horses. It will outline allotment specific monitoring studies needed to evaluate the attainment of objectives and the range improvements proposed to implement the RMP.



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

LAND TENURE ADJUSTMENTS
AND CORRIDORS

PROPOSED PLAN 1986



BLM EXISTING AND PROPOSED RECREATION SITES

NON FEDERAL PROPOSED RECREATION SITES

UNITED STATES DEPARTMENT OF THE INTERIOR
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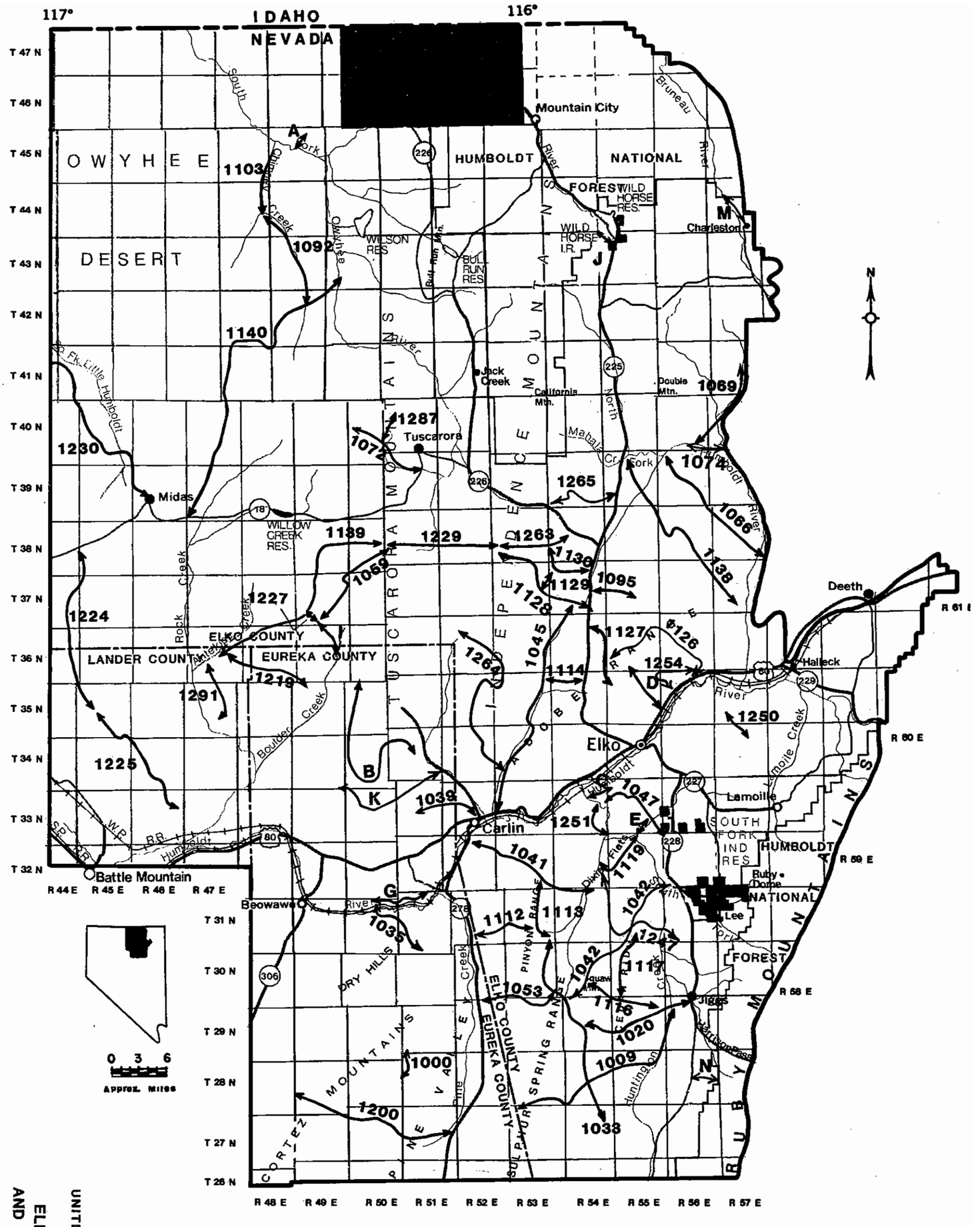
AND ENVIRONMENTAL IMPACT STATEMENT

SPECIAL RECREATION MANAGEMENT AREAS

PROPOSED PLAN 1986



ROADS IDENTIFIED AS NEEDING ACCESS ACQUISITION CONSIDERATIONS

A Bureau Roads Not On Transporation Plan

1043 Bureau Roads on Transporation Plan

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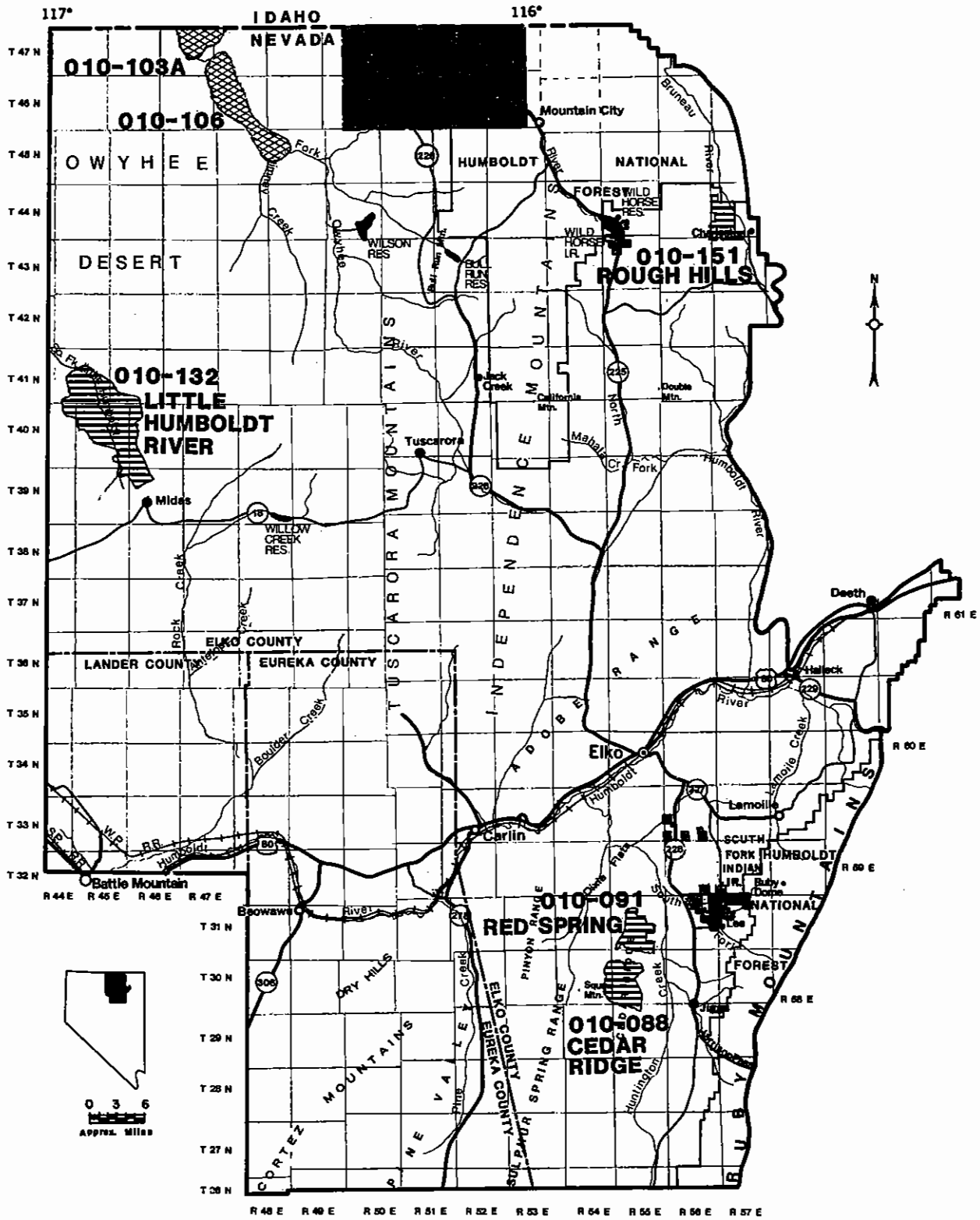
AND ENVIRONMENTAL IMPACT STATEMENT

ACCESS ROADS

PROPOSED PLAN 1986



ELKO RMP WILDERNESS STUDY AREAS

CANYONLANDS EIS WILDERNESS STUDY AREAS

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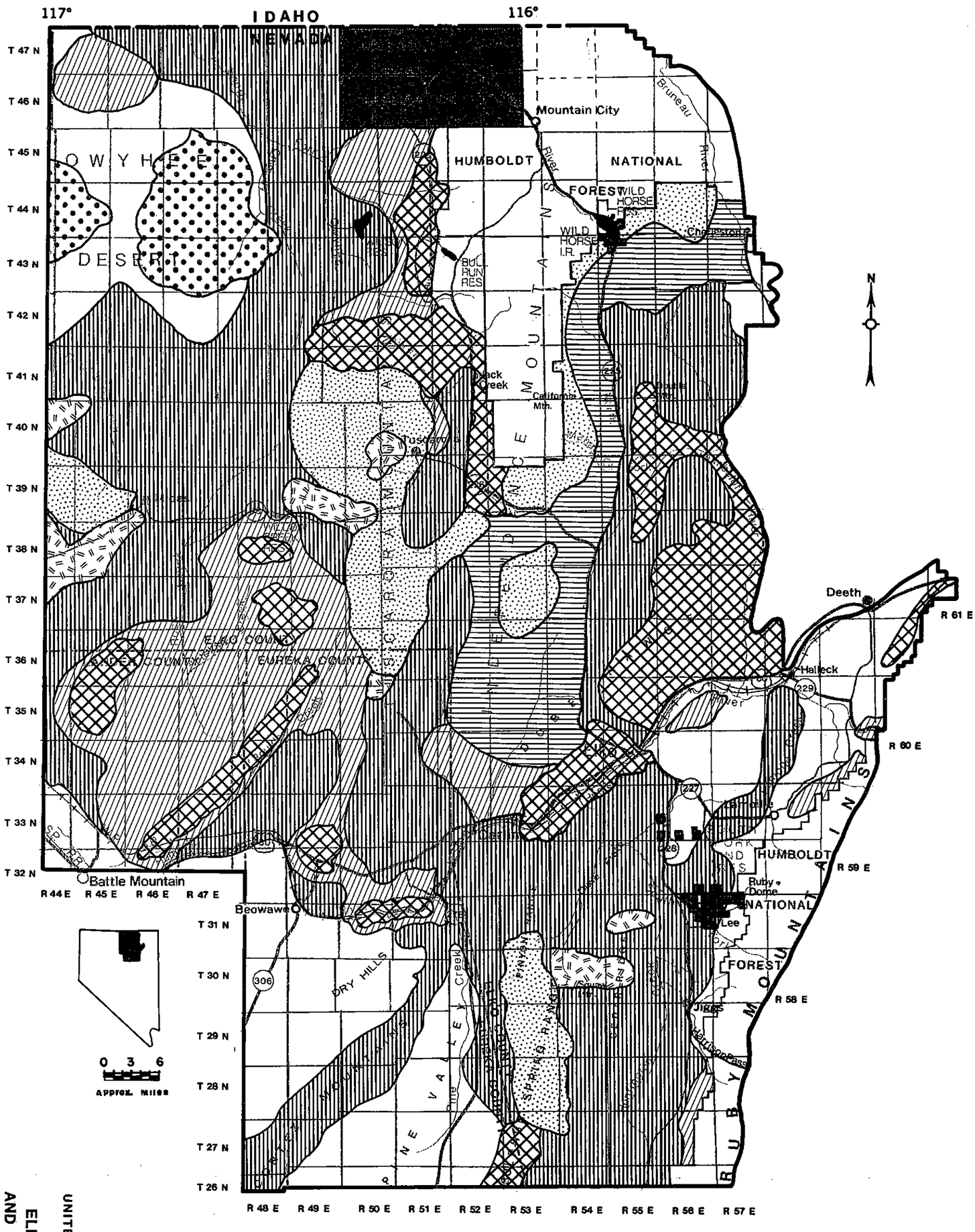
AND ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS STUDY AREAS LOCATION MAP

1986



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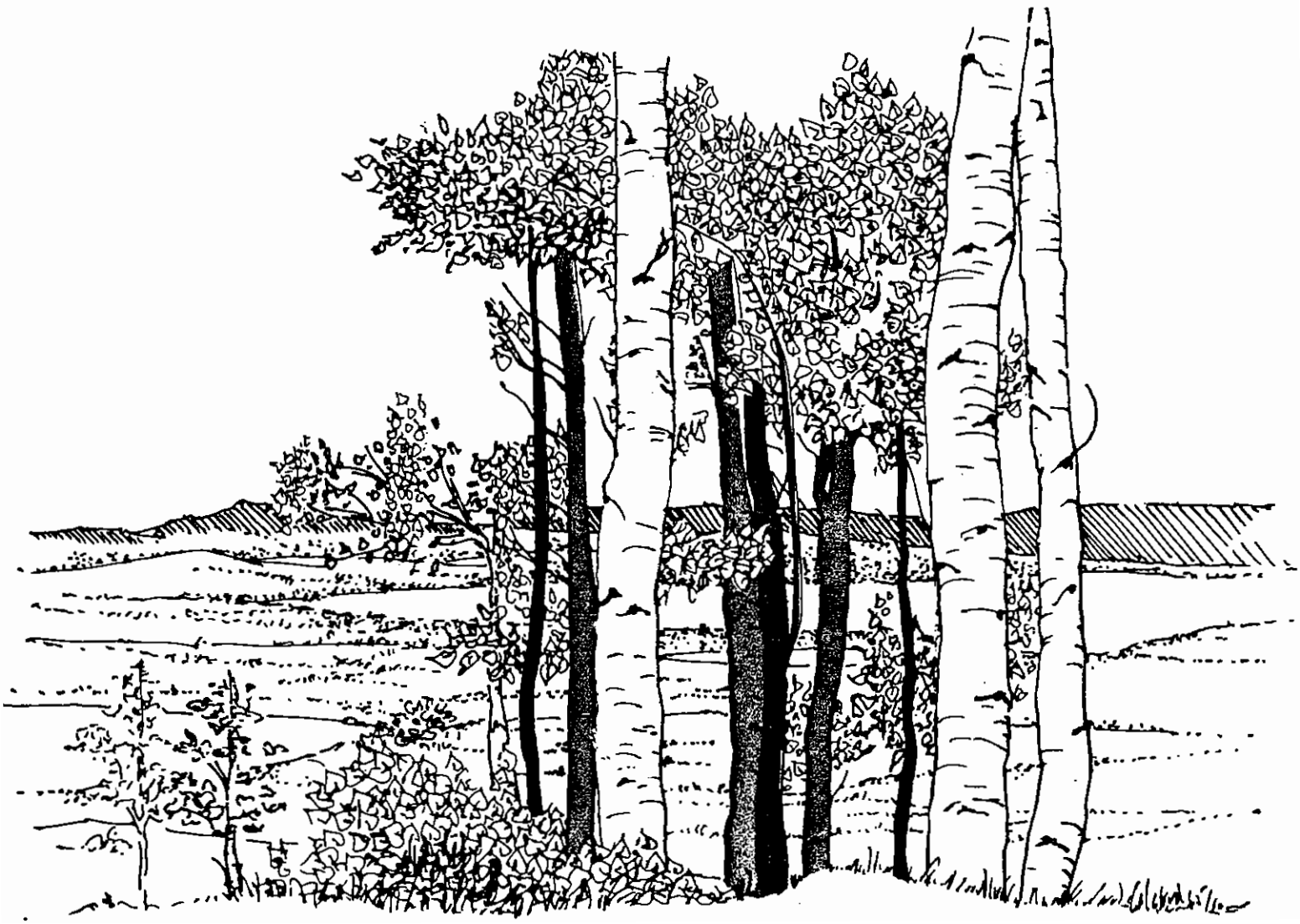
AND ENVIRONMENTAL IMPACT STATEMENT

ANTELOPE AND DEER HABITAT AREAS

PROPOSED PLAN 1986

CHAPTER THREE



REVISIONS AND ERRATA

This chapter contains changes and corrections to the text of the Draft RMP/EIS to be incorporated as part of this Proposed RMP and Final EIS. It also contains errata of sections not reprinted in this document and must be used in conjunction with the Draft RMP/EIS.

CHAPTER 2

Due to updated calculations, the following changes should be implemented throughout Chapters 2 through 4 of the Draft document: change the projected total stocking level for the proposed plan (Alternative D, preferred plan) for livestock from 396,989 to 402,096. For mule deer the existing stocking level is changed from 17,390 to 17,258 and the reasonable number is changed from 34,754 to 34,513.

Page 2-9, Change Table 2-2 of the Draft RMP, Column "Alternative E"; line "Fence Modification" to "$10,000" and line "SUBTOTAL" to "$112,000" and line "TOTAL COST" to $112,000".

Page 2-14, No. 4; Change "reintroduction" to "augmentation".

Page 2-15, Under "ALTERNATIVE D", Change line two, paragraph one to; "...toward improving ecological status, expanding livestock grazing...".

Page 2-16, Under "Issue 2: Corridors, Short and Long-Term Management Actions, 2." Add, "Projects will not be authorized within planning corridor segment R-C until completion of an Idaho BLM Statewide Corridor Environmental Impact Statement (EIS). Segment R-C would be utilized only if compatible with a corridor route identified in the Record of Decision for the Idaho BLM corridor EIS."

Page 2-18, Change, ISSUE 7: WILDLIFE HABITAT; Objective: Conserve and enhance terrestrial, riparian and aquatic wildlife habitat.

Page 2-19, No. 4; Change "reintroduction" to "augmentation".

Page 2-23, No. 4; Change "reintroduction" to "augmentation".

Page 2-25, Under "1. Lands Program":, The following is offered as clarification for the reader: "The resource area was separated into three management classification areas. The purpose of the three designations is to categorize these land types according to their suitability for various land tenure adjustments. These include Sales, Transfer Primarily by Exchange, and Retention (see the Land Tenure Adjustment and Corridor Map). These were delineated on the principle that Sale areas were difficult to manage and have limited resource values. The resource values of Transfer Primarily by Exchange areas are fewer and consequently, less cost effective to manage then the areas identified for retention.

The lands in the Sale category can be disposed of by any available means, however, the primary vehicle would be through public sale. Around communities, Recreation and Public Purposes (R&PP) leases and sales would predominate. Lands within the sale category typically meet the Federal Land Policy and Management Act (FLPMA) sale criteria.

Unlike the Sale lands, public lands identified for Transfer Primarily by Exchange do not typically meet FLPMA sale criteria. They are, however, suited for exchange for private lands within the Retention areas and are suitable for development under the agricultural land laws. Exchanges that would acquire private lands within the Transfer Primarily by Exchange areas are generally discouraged.

Finally, the Retention lands are high resource value public lands that are to be retained and managed intensively and consolidated where possible to enhance management opportunities. Disposals will generally not occur in the Retention areas. The exceptions to this would only occur adjoining existing private lands to resolve specific management problems, facilitate land exchanges within the Retention areas, or permit agricultural entry where state water law indicates priority water applications exist. No specific management actions will be analyzed for the Transfer by Exchange or Retention areas.

All public sale lands are to remain under BLM management until such time as personnel and funding are available to initiate action or acceptable proposals are received. Sale lands around communities are to remain under BLM management until the communities indicate a need for the lands.

Page 2-26, Under "1. Lands Program", change to "d) The grazing permittee shall receive reasonable compensation for the adjusted value of their investment in authorized permanent range improvements, not to exceed fair market value.".

Page 2-30, Change "c)" to "...will be guided by the procedures specified in the Western...".

Page 2-30, Change "h)" to "Fence construction will comply with BLM Manual Handbook H-1741-1 and NSO...".

Page 2-31, Under " Monitoring Program", add a new line three, paragraph one; "Monitoring will be completed in compliance with BLM Rangeland Monitoring Technical Reports 4400-2, -3, -4 and 4400-7". Change line three, paragraph three to; "...refer to the Nevada Rangeland Monitoring Handbook (Nevada Range Studies Task group, 1984),...".

Page 2-34, Under "10. Minerals", add line one, paragraph one; "...under 43 CFR 3802/3809 to prevent...".

Add line two, paragraph two; "This will include designation of community material sites."

Page 2-35, Under "12. Air Quality", change line two, paragraph one;". ..established standards specified in the National and the State of Nevada Ambient...".

Maps for land tenure adjustments and corridors for Alternatives B, C and E have been amended .

CHAPTER 3

Page 3-5, Table 3-1, Change column "Cedar Ridge" to "Oil & Gas Leases" numbering "6" instead of "11" and acres equalling "3100" instead of "7243", change column "Red Spring" to "Oil and Gas Leases" numbering "4" instead of "7" and acres equalling "3740" instead of "5484".

Page 3-8, Paragraph six, Change "reintroductions" to "reestablishment".

Page 3-10, Under "Aquatic Habitat and Fish Populations", line one, paragraph eight, insert and change: "....inhabited by Lahontan cutthroat trout (Nevada Department of Wildlife, 1980). Nine of the 16 streams...".

Page 3-15, Under "MINERALS", line nine, paragraph one, change; "...RMP area (BLM Claim Recordation Case Files, 1985)".

Page 3-18, Under "SOILS", lines three and four, paragraph one; change to, "...are available as published manuscripts. The other surveys...are subject to review and revision as part of the National Cooperative Soil Survey correlation process. These surveys will also be available as published manuscripts in the near future.".

Page 3-30, " Allotment Boundary Map Reference List", add to end of last column; "A - Little Owyhee, B - Bullhead, C - Jiggs, D - Pearl Creek". Add astericks to the following allotments to designate AMPs: "Mori, Twenty-five, Taylor Canyon, Eagle Rock, Bruneau River, Dorsey, Adobe Hills, Blue Basin, Willow Creek Pockets, Frost Creek". Add double astericks to "Achurra" and "Twin Creek East" allotments to designate both allotments under one AMP. Add triple astericks to "Mahala Creek" and "Sheep Creek" allotments to designate a Coordinated Management Plan.

CHAPTER 4

Page 4-7, Under "VEGETATION", line four, paragraph three, change to: "...49 allotments would show an upward trend due to...". Add to line five: "...their present seral stage or forage condition.".

Page 4-13, Under "WILDLIFE HABITAT", Insert new paragraph four; "Additional adverse impacts would occur to mule deer in crucial winter habitat from designation of an ORV use area in the Adobe Hills. The presence of humans and vehicles would displace and stress mule deer populations."

Page 4-13, paragraph eight, Change "reintroduction" to "reestablishment and introduction".

Page 4-15, Table 4-1, change "Alternative D, Long-term" to 117 under "miles Intensively Managed".

Page 4-24, paragraph five, change "reintroduction" to "reestablishment, augmentation and introduction".

Page 4-26, Under "MINERALS", line one, paragraph three, change to; "An adverse but not significant impact is expected...".

Page 4-31, parpagraph four, change "Reintroduction" to "Reestablishment, augmentation and introduction". Paragraph five, change "115 miles" to "117 miles".

Page 4-31, paragraph seven line two, change "the protection and enhancement of 117 miles of ...".

Page 4-33, Under "VEGETATION", line one, paragraph five; add "...their present ecological status or forage condition.", paragraph eight; change to "Habitat quality would improve on 1135 acres of protected spring site riparian vegetation and 115 acres would remain unchanged."

Page 4-38, Under VEGETATION", line one, paragraph four, add to: " The trend in almost all native allotments is projected..." Line two, paragraph four, "...the most part totally seeded or at the highest...".

APPENDICES

Pages A-10 to A-13, Appendix 3, Table 2, have been amended. See attached pages for information.

Pages A-34 to A-40, Appendix 4, Table 1, have been amended. See attached pages for information.

Page A-45, Title Page, Change to; "VEGETATION AND ECOLOGICAL STATUS".

Page A-46, Sentence two, paragraph one, Change to; "The use of Soil Conservation Service initial stocking level guides...".

Page A-46, Sentence one, paragraph four, change to, "With the same soil and ecological site information available as for the "I" (Improve) category allotments, an in-office survey was conducted on the "M" or Maintain and "C" or Custodial category allotments using the professional

judgement of the resource area range conservationists and SCS personnel familiar with the study area. For analysis purposes an overall apparent trend rating was assigned to each of these allotments by BLM range conservationists."

Page A-46, paragraph five; add line five "Miscellaneous acres were mainly composed of crested wheatgrass seedings (rated at 2.5 acres per AUM) and woodlands (rated at 30 acres per AUM)."

Page A-47, last paragraph; change to "Improvement in ecological status through increases...".

Page A-48, paragraph three; change to "Improvement in ecological status on the moderate...", paragraph four; change to "These general category characteristics were developed by BLM Carson City District and Reno SCS range specialists. Elko District BLM range personnel adapted these characteristics to the sites in the Elko Planning Area. Response potential assignments for the ecological sites in the planning area were determined by Elko District, BLM and Elko SCS range conservationists."

Page G-7, Change definition of trend to: "trend refers to direction of change over time. It indicates whether the rangeland (or wildlife habitat) is moving toward or away from its potential or toward or away from specific management objectives. Trend is judged by noting changes in characteristics such as vegetation frequency, composition, density, cover and production."

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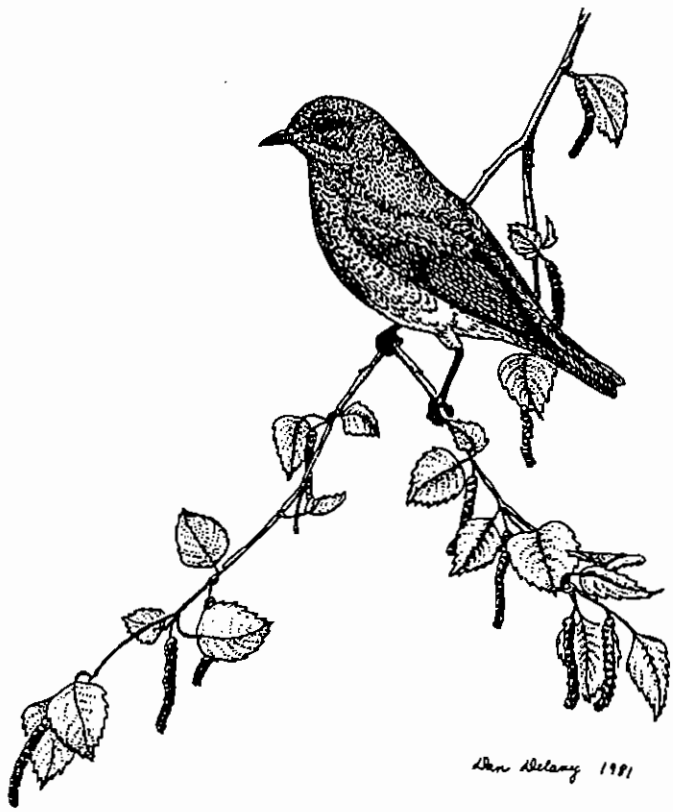
USDI, Bureau of Land Management. 1983. Wilderness Mineral Assessment Files. Elko District, Elko, Nevada, unpaged.

Ballantyne, Kurtis J. and David C. Jones. 1981. Peregrine falcon habitat inventory, Wells Resource Area, Elko District, Nevada. Bureau of Land Management, Elko, NV. 23 pp.

Bonham, H.F. Jr. 1984. "Reserves, Host Rocks, and Ages of Bulk-Mineable Precious Metal Deposits in Nevada, " IN The Nevada Mineral Industry. Nevada Bureau of Mines and Geology. Special Publication. MI-1984.



APPENDIX 3
TABLE 2
PROJECTED LIVESTOCK STOCKING LEVEL
(AUMs) BY ALTERNATIVE 1/
ELKO RMP AREA

Map Ref. Number	Allotment Name	ALT. "B"	ALT. "C"	ALT. "D"
1	Owyhee	52,173	15,112	37,428
2	YP Allotment	14,716	6,512	15,771
3	Petan Owyhee Unit	2,094	1,047	2,191
4	Indian Creek FFR	854	427	323
5	VN Pocket Petan	983	492	1,117
6	VN Pocket Allied	2,066	656	1,053
7	Cornucopia	3,815	1,317	2,051
8	Andrae	5,711	2,282	4,580
9	Wilson Mtn.	308	154	412
10	Lime Mtn.	2,072	916	2,770
11	Mori	2,725	1,122	3,962
12	Bucket Flat	188	94	335
13	Rock Creek	57,578	24,498	57,550
14	Midas	711	356	572
15	Little Humboldt	10,207	3,827	3,972
16	Twenty Five	34,443	17,090	26,873
17	Tuscarora	14,831	7,134	14,380
18	Six Mile	319	92	107
19	Taylor Canyon	2,762	1,170	3,161
20	Eagle Rock	6,139	2,912	10,847
21	Wildhorse Group	6,096	2,600	6,474
22	Rough Hills	887	444	777
23	Stone Flat FFR	41	20	18
24	Annie Creek	735	296	531
25	Bruneau River	1,146	419	974
26	Rattlesnake Canyon	2,779	1,296	1,721
27	Stone Flat	863	358	318
28	Four Mile	8,076	3,490	5,236
29	Beaver Creek	17,154	7,518	14,931
30	Mason Mtn.	370	185	267
31	Mexican Field	666	273	367
32	Cotant	939	416	451
33	Double Mtn.	5,792	2,563	4,192
34	Sheep Creek	1,702	786	2,015
35	Mahala Creek	2,138	912	2,279
36	Eagle Rock 1	1,900	696	1,609
37	Lone Mountain	8,502	3,601	6,915
38	Fox Springs	626	313	729
39	Coal Mine Basin	2,356	736	1,314
40	North Fork Group	24,405	7,982	11,136
41	Dorsey	1,446	512	1,035
42	Long Field	236	104	117
43	Halleck	643	322	155

APPENDIX 3
TABLE 2 (Continued)
PROJECTED LIVESTOCK STOCKING LEVEL
(AUMs) BY ALTERNATIVE 1/
ELKO RMP AREA

Map Ref. Number	Allotment Name	ALT. "B"	ALT. "C"	ALT. "D"
44	Adobe Hills	3,848	1,763	4,058
45	White Rock	1,050	398	1,204
46	Adobe	526	263	351
47	Blue Basin	7,113	3,234	7,935
48	Dry Susie	1,112	464	1,225
49	Carlin Canyon	51	25	42
50	Carlin Field	2,763	1,222	2,414
51	Hadley	7,850	2,764	4,574
52	Taylors Carlin	28	14	4
53	Marys Mountain	2,157	946	1,513
54	T Lazy S	20,021	7,625	13,081
55	Horseshoe	2,090	815	1,345
56	Palisade	1,336	668	742
57	Pine Mountain	6,506	2,777	3,215
58	Iron Blossom	1,558	770	817
59	Safford Canyon	1,482	696	1,045
60	Scotts Gulch	1,781	606	1,140
61	Geyser	3,167	1,030	1,931
62	Thomas Creek	1,078	539	1,049
63	Thomas Creek FFR	60	30	9
64	Devils Gate	401	187	217
65	South Buckhorn	25,782	10,327	20,175
66	Potato Patch	764	382	843
67	Pine Creek	150	75	824
68	Mineral Hill	2,285	778	1,943
69	Union Mountain	2,789	880	669
70	Bruffy	2,042	903	731
71	Pony Creek	1,692	814	826
72	Indian Springs	3,050	1,334	2,658
73	Dixie Flats	1,737	868	2,503
74	Emmigrant Spring	3,265	729	1,278
75	Tonka	1,626	813	1,642
76	Old Eighty FFR	12	6	6
77	Grindstone	1,010	447	514
78	Cut Off	349	174	148
79	Bullion Road	218	109	656
80	Ten Mile	363	182	563
81	Four Mile Canyon	775	298	451
82	Burner Basin	164	82	85
83	Elko Hills	2,226	483	1,301
84	East Fork	2,265	602	1,365
85	East Fork FFR	17	8	4
86	Burger Creek	11	6	18
87	Smiraldo	844	374	1,154

APPENDIX 3
TABLE 2 (Continued)
PROJECTED LIVESTOCK STOCKING LEVEL
(AUMs) BY ALTERNATIVE 1/
ELKO RMP AREA

Map Ref. Number	Allotment Name	ALT. "B"	ALT. "C"	ALT. "D"
88	King Seeding	589	260	913
89	Horse Fly	609	232	1,103
90	Heelfly	66	33	147
91	Secret	258	71	184
92	Rabbit Creek	655	328	1,695
93	Kennedy Seeding	514	127	614
94	Walther	47	24	54
95	Palacio Seeding	373	163	412
96	Sandhill North	683	165	444
97	Sandhill South	74	37	237
98	Bellinger	675	139	974
99	Hog Tommy	566	84	198
100	Bottari Seeding	885	256	829
101	Olgivie-Orbe	2,538	776	3,417
102	LDS FFR	119	60	26
103	Shoshone	3,891	1,722	3,568
104	Chimney Creek	2,371	1,049	2,402
105	Twin Bridges	963	169	733
106	River	1,303	105	287
107	LDS	89	44	90
108	McMullen FFR	39	20	39
109	South Fork	1,031	296	541
110	Crane Springs	1,448	640	1,164
111	Dixie Creek	4,639	2,052	5,532
112	Sleeman	1,392	696	346
113	Hansel	1,553	776	2,443
114	Wilson FFR	153	76	20
115	Willow	1,746	273	1,261
116	Willow Creek Pockets	1,313	338	1,664
117	Cottonwood FFR	314	102	34
118	Merkley Zunino	557	70	702
119	Achurra	757	378	901
120	Barnes Seeding	451	200	1,126
121	Barnes FFR	32	16	14
122	Little Porter FFR	24	12	20
123	Robinson Mtn. FFR	36	18	30
124	Robinson Mtn.	3,392	1,501	3,258
125	Little Porter	1,075	144	328
126	Robinson Creek	3,487	1,372	2,941
127	Frost Creek	2,236	988	2,247
128	Corta FFR	92	46	12
129	Corral Canyon	668	262	467
130	Forest FFR	64	32	69
131	Pearl Creek	528	234	661

APPENDIX 3
TABLE 2 (Continued)
PROJECTED LIVESTOCK STOCKING LEVEL
(AUMs) BY ALTERNATIVE 1/
ELKO RMP AREA

Map Ref. Number	Allotment Name	ALT. "B"	ALT. "C"	ALT. "D"
132	Rattlesnake Mtn.	145	72	129
133	Lindsay Creek	1,524	674	1,943
134	Twin Creek North	908	374	1,036
135	Twin Creek East	646	323	617
136	Twin Creek South	390	195	437
137	Merkley FFR	250	125	412
138	Red Rock	12,004	3,752	7,792
139	Browne	1,895	654	1,409
140	Mitchell Creek	6,077	650	2,890
GRAND TOTALS		491,741	193,767	402,096
2/	Little Owyhee	13,370	6,685	15,246
2/	Bullhead	6,779	3,390	4,116
2/	Jiggs	806	403	291
2/	Pearl Forest	159	79	69

1/ Alternative E is the No Livestock Alternative, all livestock would be eliminated from public land.

2/ Allotment is within the Elko Planning Area but administered by other Federal agencies or BLM Districts.

APPENDIX 4
TABLE 1
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
1	Owyhee	DY-2-(s)=13%	113	56	03/16-11/15(8)	224	111
		DY-2-(w)=13%	295	147	11/16-03/15(4)	292	144
		DW-6=52%	26	13	11/15-03/16(4)	26	13
2	YP	DY-2-(s)=7%	61	30	03/16-11/15(8)	120	59
		DY2-(w)=7%	159	80	11/16-03/15(4)	156	78
3	Owyhee-Petan	DY-2-(s)=1%	9	5	03/16-11/15(8)	17	9
	Petan	DY-2-(w)=1%	23	11	11/16-03/15(4)	22	10
4	Indian Cr. FFR	DW-2-(s)=3%	15	7	03/16-11/15(8)	30	14
		DW-2-(w)=3%	60	30	11/16-03/15(4)	60	30
		CDW-2-(s)=7%	35	17	03/16-11/15(8)	70	34
		CDW-2-(w)=7%	140	70	11/16-03/15(4)	140	70
5	VN Pocket-	DY-2-(s)=1%	9	5	03/16-11/15(8)	8	5
	Petan	DY-2-(w)=1%	23	11	11/16-03/15(4)	10	5
		DW-2-(s)=1%	5	2	03/16-11/15(8)	5	2
		DW-2-(w)=1%	20	10	11/16-03/15(4)	9	5
6	VN Pocket-	DY-2-(s)=1%	9	5	03/16-11/15(8)	17	9
	Allied	DY-2-(w)=1%	23	11	11/16-03/15(4)	21	10
7	Cornucopia	DY-2-(s)=1%	9	5	03/16-11/15(8)	14	8
		DY-2-(w)=1%	23	11	11/16-03/15(4)	18	9
		DW-2-(s)=2%	10	5	03/16-11/15(8)	16	8
		DW-2-(w)=2%	40	20	11/16-03/15(4)	31	16
8	Andrae	DY-2-(s)=1%	9	5	03/16-11/15(8)	17	9
		DY-2-(w)=1%	23	11	11/16-03/15(4)	21	10
		CDW-2-(s)=1%	5	2	03/16-11/15(8)	9	4
		CDW-2-(w)=1%	30	10	11/16-03/15(4)	28	9
9	Wilson Mtn.	DW-2-(s)=2%	10	5	03/16-11/15(8)	15	8
		DW-2-(w)=2%	40	20	11/16-03/15(4)	30	15
		CDW-2-(s)=2%	10	5	03/16-11/15(8)	15	8
		CDW-2-(w)=2%	40	20	11/16-03/15(4)	30	15
10	Lime Mtn.	DW-2-(s)=2%	10	5	03/16-11/15(8)	10	5
		DW-2-(w)=2%	40	20	11/16-03/15(4)	20	10
		CDW-2-(s)=2%	10	5	03/16-11/15(8)	10	5
		CDW-2-(w)=2%	40	20	11/16-03/15(4)	20	10
		CDS-1=2%	29	15	03/16-11/15(8)	29	15
11	Mori	CDW-2-(s)=4%	20	10	03/16-11/15(8)	35	18
		CDW-2-(w)=4%	80	40	11/16-03/15(4)	70	35
12	Bucket Flat	CDW-3=2%	20	10	11/15-03/16(4)	14	7

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
13	Rock Creek	CDS-3=44%	1971	986	03/16-11/15(8)	2957	1479
		DW-2-(s)=38%	190	95	03/16-11/15(8)	285	143
		DW-2-(w)=38%	760	380	11/16-03/15(4)	570	285
		CDW-2-(s)=4%	20	10	03/16-11/15(8)	30	15
		CDW-2-(w)=4%	80	40	11/16-03/15(4)	60	30
		DY-2-(s)=35%	305	153	03/16-11/15(8)	458	230
		DY-2-(w)=35%	793	397	11/16-03/15(4)	595	298
		CDY-2-(s)=2%	17	9	03/16-11/15(8)	26	14
		CDY-2-(w)=2%	45	23	11/16-03/15(4)	34	17
14	Midas	DS-4=4%	40	20	03/16-11/15(8)	46	23
		DY-2-(s)=2%	17	9	03/16-11/15(8)	20	10
		DY-2-(w)=2%	45	23	11/16-03/15(4)	26	13
15	Little Humboldt	CDS-4=33%	330	165	03/16-11/15(8)	521	261
		DS-4=47%	470	235	03/16-11/15(8)	743	371
		DY-2-(s)=4%	35	17	03/16-11/15(8)	55	27
		DY-2-(w)=4%	91	45	11/16-03/15(4)	72	36
		CDY-2-(s)=5%	44	22	03/16-11/15(8)	70	35
		CDY-2-(w)=5%	113	56	11/16-03/15(4)	89	44
16	Twenty Five	DY-2-(s)=7%	61	30	03/16-11/15(8)	73	36
		DY-2-(w)=7%	159	80	11/16-03/15(4)	95	48
		CDY-2-(s)=1%	9	4	03/16-11/15(8)	11	5
		CDY-2-(w)=1%	23	12	11/16-03/15(4)	14	7
		DW-5=53%	3143	1572	11/15-03/16(4)	1886	943
		CDW-5=9%					
		DS-1=3%	715	358	03/16-11/15(8)	858	430
		CDS-3=15%					
17	Tuscarora	DY-2-(s)=4%	35	17	03/16-11/15(8)	36	17
		DY-2-(w)=4%	91	45	11/16-03/15(4)	46	23
		CDY-2-(s)=5%	44	22	03/16-11/15(8)	45	22
		CDY-2-(w)=5%	113	56	11/16-03/15(4)	58	29
		DW-2-(s)=1%	5	2	03/16-11/15(8)	5	2
		DW-2-(w)=1%	20	10	11/16-03/15(4)	10	5
		CDW-3=4%	40	20	11/16-03/15(4)	20	10
		CDW-5=2%	101	50	11/16-03/15(4)	52	26
		CDS-3=30%	1344	672	03/16-11/15(8)	1371	685
18	Six Mile	---	---	---	---	---	---
19	Taylor Canyon	DY-2-(s)=1%	9	4	03/16-11/15(8)	12	5
		DY-2-(w)=1%	23	12	11/16-03/15(4)	15	8
		DS-1=1%	28	14	03/16-11/15(8)	38	19
		CDS-1=1%					
		CDS-3=14%	140	70	11/15-03/16(4)	94	47

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
20	Eagle Rock	CDW-3=3%	30	15	11/15-03/16(4)	24	12
		DS-1=3%	86	43	03/16-11/15(8)	138	69
		CDS-1=3%					
21	Wildhorse Group	CDW-1=1%	5	3	11/15-03/16(4)	2	1
		DS-1=5%	128	64	03/16-11/15(8)	100	50
		CDS-1=4%					
22	Rough Hills	DS-1=1%	32	18	04/01-10/30(7)	48	27
		CDS-1=1%					
23	Stone Flat FFR	DS-1=1%	32	18	04/01-10/30(7)	56	32
		CDS-1=1%					
24	Annie Cr.	DS-1=1%	16	9	04/01-10/30(7)	22	12
25	Bruneau River	DS-1=1%	16	9	04/01-10/30(7)	21	12
26	Rattlesnake Cyn.	DS-1=1%	16	9	04/01-10/30(7)	27	15
27	Stone Flat	DS-1=1%	16	9	04/01-10/30(7)	19	11
		CDS-1=1%					
28	Four Mile	DY-1=4%	108	62	01/01-12/31(12)	275	158
		DS-1=4%	63	36	04/01-10/30(7)	94	54
29	Beaver Creek	DY-1=19%	515	294	01/01-12/31(12)	1375	785
30	Mason Mtn.	DY-1=3%	81	46	01/01-12/31(12)	134	76
31	Mexican Field	DY-1=3%	81	46	01/01-12/31(12)	211	120
32	Cotant	DY-1=3%	81	46	01/01-12/31(12)	207	117
33	Double Mtn.	DY-1=7%	190	108	01/01-12/31(12)	519	295
		CDW-2=40%	1056	602	11/01-03/30(5)	1201	685
34	Sheep Creek	DS-1=1%	28	14	03/16-11/15(8)	44	22
		CDS-1=1%					
35	Mahala Creek	DS-1=2%	43	22	03/16-11/15(8)	52	26
		CDS-1=1%					
36	Eagle Rock 1	DS-1=1%	28	14	03/16-11/15(8)	48	24
		CDS-1=1%					
37	Lone Mtn.	DS-1=5%	114	57	03/16-11/15(8)	148	74
		CDS-1=3%					
38	Fox Springs	DS-1=1%	28	14	03/16-11/15(8)	25	12
		CDS-1=1%					
39	Coal Mine Basin	DY-1=3%	81	46	01/01-12/31(12)	114	65
		CDW-2=7%	185	105	11/01-03/30(5)	109	62
40	North Fork Group	DY-1=38%	1031	588	01/01-12/31(12)	1608	917
		CDW-2=53%	1399	797	11/01-03/30(5)	909	518
41	Dorsey	DY-1-3%	81	46	01/01-12/31(12)	112	63
42	Long Field	DY-1=3%	81	46	01/01-12/31(12)	114	65
43	Halleck	CDW-1=14%	380	217	11/01-03/30(5)	105	60
44	Adobe Hills	DY-1=14%	380	217	01/01-12/31(12)	513	293
		CDW-1=18%	2508	1430	11/01-03/30(5)	1411	804

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
45	White Rock	CDW-1=8%	211	120	11/01-03/30(5)	135	77
46	Adobe	DS-1=1%	16	9	04/01-10/30(7)	20	11
47	Blue Basin	DS-1=6%	100	50	03/16-11/15(8)	142	71
		CDS-1=1%					
48	Dry Susie	DW-4=1%	88	44	11/15-03/16(4)	9	4
		CDW-4=8%					
		DS-1=6%	86	43	03/16-11/15(8)	17	9
49	Carlin Canyon	CDW-4=1%	10	5	11/15-03/16(4)	2	1
50	Carlin Field	DW-4=20%	245	123	11/15-03/16(4)	189	95
		CDW-4=5%					
		DS-1=1%	14	7	03/16-11/15(8)	22	11
51	Hadley	DY-2-(s)=1%	9	4	03/16-11/15(8)	6	3
		DY-2-(w)=1%	23	12	11/16-03/15(4)	7	4
		DW-4=50%	490	245	11/15-03/16(4)	157	78
		DS-2=43%	301	151	03/16-11/15(8)	193	97
52	Taylors Carlin	DW-4=1%	10	5	11/15-03/16(4)	2	1
53	Mary's Mtn.	DW-4-15%	147	74	11/15-03/16(4)	69	35
		DY-2-(s)=2%	17	9	03/16-11/15(8)	16	8
		DY-2-(w)=2%	45	23	11/16-03/15(4)	21	11
54	T Lazy S	DY-2-(s)=5%	44	22	03/16-11/15(8)	37	18
		DY-2-(w)=5%	113	56	11/16-03/15(4)	47	24
		CDY-2-(s)=1%	9	4	03/16-11/15(8)	8	3
		CDY-2-(w)=1%	23	11	11/15-03/16(4)	10	5
		DW-5=10%					
		CDW-5=3%	659	330	11/15-03/16(4)	277	139
		CDS-3=11%	493	247	03/16-11/15(8)	414	207
	Argenta (include	DY-2-(s)=2%	17	9	03/16-11/15(8)	16	8
	with Geyser)	DY-2-(w)=2%	45	23	11/16-03/15(4)	21	11
		CDY-2-(s)=2%	17	9	03/16-11/15(8)	16	8
		CDY-2-(w)=2%	45	23	11/16-03/15(4)	21	11
55	Horseshoe	DY-2-(s)=1%	9	4	03/16-11/15(8)	8	4
		DY-2-(w)=1%	23	12	11/16-03/15(4)	11	6
		DW-5=5%	508	254	11/15-03/16(4)	239	119
		CDW-5=5%					
56	Palisade	DY-2-(s)=1%	9	4	11/15-03/16(4)	5	2
		DY-2-(w)=1%	23	12	11/16-03/15(4)	12	6
		DW-5=3%	253	127	11/15-03/16(4)	129	65
		CDW-5=2%					
57	Pine Mtn.	DY-1-(s)=14%	43	21	03/16-11/15(8)	41	20
		DY-1-(w)=14%	210	105	11/16-03/15(4)	101	50
		CDS-2=8%	56	28	03/15-11/15(8)	54	27

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
58	Iron Blossom	DY-1=14%	178	75	01/01-12/31(12)	267	113
59	Safford Canyon	DW-5=4%	406	171	11/01-03/30(5)	447	188
		CDW-5=4%					
60	Scotts Gulch	CDW-5=2%	101	42	11/01-03/30(5)	57	24
61	Geyser	DY-2-(s)=1%	9	4	03/16-11/15(8)	8	4
		DY-2-(w)=1%	23	12	11/16-03/15(4)	11	6
62	Thomas Cr.	---	--	--	---	--	--
63	Thomas Cr. FFR	---	--	--	---	--	--
64	Devils Gate	DY-1=7%	89	37	01/01-12/31(12)	53	22
65	South Buckhorn	DY-1=75%	953	400	01/01-12/31(12)	2058	864
66	Potato Patch	DY-1=4%	51	21	01/01-12/31(12)	150	62
67	Pine Cr.	---	--	--	---	--	--
68	Mineral Hill	CDW-1=20%	288	144	11/15-03/16(4)	274	137
69	Union Mtn.	DY-1-(s)=2%	6	3	03/16-11/15(8)	12	6
		DY-1-(w)=2%	30	15	11/16-03/15(4)	30	15
		CDW-1=60%	863	362	11/01-03/30(5)	1068	448
70	Bruffy	DY-1-(s)=2%	6	3	03/16-11/15(8)	12	6
		DY-1-(w)=2%	30	15	11/16-03/15(4)	29	15
		CDS-2=10%	70	35	03/16-11/15(8)	137	69
		CDW-1=20%	288	144	11/15-03/16(4)	282	141
71	Pony Creek	DY-1-(s)=1%	3	1	03/16-11/15(8)	6	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	14	6
		CDS-2=13%	91	45	03/16-11/15(8)	167	83
72	Indian Springs	DY-1-(s)=4%	12	6	03/16-11/15(8)	13	7
		DY-1-(w)=4%	60	30	11/16-03/15(4)	34	17
		CDS-2=20%	140	70	03/16-11/15(8)	157	78
73	Dixie Flats	DY-1-(s)=4%	12	6	03/16-11/15(8)	17	8
		DY-1-(w)=4%	60	30	11/16-03/15(4)	42	21
		CDS-2=3%	21	10	03/16-11/15(8)	29	14
74	Emmigrant Spr.	DY-1-(s)=6%	18	9	03/16-11/15(8)	21	10
		DY-1-(w)=6%	90	45	11/16-03/15(4)	52	26
75	Tonka	DY-1-(s)=5%	15	7	03/16-11/15(8)	24	11
		DY-1-(w)=5%	75	37	11/16-03/15(4)	61	30
		CDW-4=2%	32	16	11/15-03/16(4)	26	13
76	Old Eighty FFR	---	---	---	---	---	---
77	Grindstone Mtn.	DY-1-(s)=3%	9	4	03/16-11/15(8)	7	3
		DY-1-(w)=3%	45	22	11/16-03/15(4)	18	9
		CDW-4=1%	10	5	11/15-03/16(4)	4	2
78	Cut-off	DY-1-(s)=1%	3	1	03/15-11/15(8)	2	1
		DY-1-(w)=1%	15	7	11/16-03/15(4)	6	3
79	Bullion Rd.	DY-1-(s)=1%	3	1	03/16-11/15(8)	4	1
		DY-1-(w)=1%	15	7	11/16-03/15(4)	9	4
		CDW-4=1%	40	20	11/15-03/16(4)	24	12

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
80	Ten Mile	DY-1-(s)=2%	6	3	03/16-11/15(8)	7	3
		DY-1-(w)=2%	30	15	11/16-03/15(4)	17	9
81	Four Mile Cny.	DY-1-(s)=3%	9	4	03/16-11/15(8)	8	3
		DY-1-(w)=3%	45	22	11/16-03/15(4)	19	9
		DW-4=1%	10	5	11/15-03/16(4)	4	2
82	Burner Basin	DW-4=1%	2	1	11/15-03/16(4)	1	1
		DS-1=2%	4	2	03/16-11/15(8)	1	1
83	Elko Hills	DW-4=4%	8	2	11/15-03/15(4)	4	1
		DS-1=2%	4	1	05/01-11/15(6.5)	3	1
84	East Fork	DW-4=3%	6	2	11/15-03/15(4)	4	1
		DS-1=2%	4	1	05/01-11/15(6.5)	5	1
85	East Fork FFR	DS-1=2%	4	1	05/01-11/15(6.5)	7	2
86	Burger Cr.	CDW-4=1%	2	1	11/15-03/15(4)	2	1
87	Smiraldo	---	--	--	---	--	--
88	King Seeding	---	--	--	---	--	--
89	Horse Fly	DS-1=2%	4	1	05/01-11/15(6.5)	6	1
90	Heel Fly	DS-1=2%	4	1	05/01-11/15(6.5)	4	1
91	Secret	DS-1=2%	4	1	05/01-11/15(6.5)	4	1
92	Rabbit Cr.	DS-1=2%	4	1	05/01-11/15(6.5)	4	1
		DY-1=8%	92	25	01/01-12/31(12)	152	41
93	Kennedy Seeding	---	--	--	---	--	--
94	Walther	---	--	--	---	--	--
95	Palacio Seeding	---	--	--	---	--	--
96	Sandhill North	---	--	--	---	--	--
97	Sandhill South	---	--	--	---	--	--
98	Bellinger	---	--	--	---	--	--
99	Hog Tommy	---	--	--	---	--	--
100	Bottari Seeding	---	--	--	---	--	--
101	Olgivie Orbe	---	--	--	---	--	--
102	LDS FFR	---	--	--	---	--	--
103	Shoshone	DY-1-(s)=1%	3	1	03/16-11/15(8)	5	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	12	5
104	ChimneyCr.	DY-2=2%	23	6	01/01-12/31(12)	66	17
105	Twin Bridges	DY-1-(s)=1%	3	1	03/16-11/15(8)	5	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	13	6
106	River	DY-1-(s)=2%	6	3	03/16-11/15(8)	8	4
		DY-1-(w)=2%	30	15	11/16-03/15(4)	19	10
107	LDS	---	--	--	---	--	--
108	McMullen FFR	---	--	--	---	--	--
109	South Fork	DY-1=3%	35	9	01/01-12/31(12)	85	22

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS[1/]	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
110	Crane Springs	DY-1-(s)=3%	9	4	03/16-11/15(8)	15	7
		DY-1-(w)=3%	45	22	11/16-03/15(4)	37	18
		CDY-1-(s)=3%	9	4	03/16-11/15(8)	15	7
		CDY-1-(w)=3%	45	22	11/16-03/15(4)	37	18
111	Dixie Cr.	DY-1-(s)=10%	30	15	03/16-11/15(8)	39	20
		DY-1-(w)=10%	150	75	11/16-03/15(4)	98	49
		CDY-1-(s)=1%	3	1	03/16-11/15(8)	4	1
		CDY-1-(w)=1%	15	7	11/16-03/15(4)	10	5
		CDS-2=15%	105	52	03/16-11/15(8)	137	68
112	Sleeman	CDY-1-(s)=1%	3	1	03/16-11/15(8)	6	2
		CDY-1-(w)=1%	15	7	11/16-03/15(4)	15	7
113	Hansel	DY-1-(s)=1%	3	1	03/16-11/15(8)	6	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	14	7
		CDY-1-(s)=2%	6	3	03/16-11/15(8)	11	6
		CDY-1(w)=2%	30	15	11/16-03/15(4)	28	14
114	Wilson FFR	DY-1=1%	18	9	01/01-12/31(12)	54	27
115	Willow	DY-1-(w)=1%	3	1	03/16-11/15(8)	4	1
		DY-1-(w)=1%	15	7	11/16-03/15(4)	11	5
116	Willow Cr. Pockets	DY-1-(s)=1%	3	1	03/16-11/15(8)	5	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	12	6
117	Cottonwood FFR	DY-1=2%	18	9	01/01-12/31(12)	54	27
118	Merkley-Zunino Seeding	---	--	--	---	--	--
119	Achurra	DY-1-(s)=1%	3	1	03/16-11/15(8)	6	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	15	7
120	Barnes Seeding	---	--	--	---	--	--
121	Barnes FFR						
122	Little Porter FFR	---	--	--	---	--	--
123	Robinson Mtn. FFR						
124	Robinson Mtn.	DY-1-(s)=3%	9	4	03/16-11/15(8)	17	8
		DY-1-(w)=3%	45	22	11/16-03/15(4)	43	21
		CDS-2=7%	49	25	03/16-11/15(8)	94	48
125	Little Porter	DY-1-(s)=1%	3	1	03/16-11/15(8)	6	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	15	7
126	Robinson Cr.	DY-1-(s)=2%	6	3	03/16-11/16(8)	12	6
		DY-1-(w)=2%	30	15	11/16-03/15(4)	29	15
		CDS-2=5%	35	17	03/16-11/15(8)	68	33
127	Frost Cr.	DY-1-(s)=2%	6	3	03/16-11/15(8)	12	6
		DY-1-(w)=2%	30	15	11/16-03/15(4)	29	14
128	Corta FFR	DSP=1%	8	2	03/15-04/30(1.5)	2	1

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

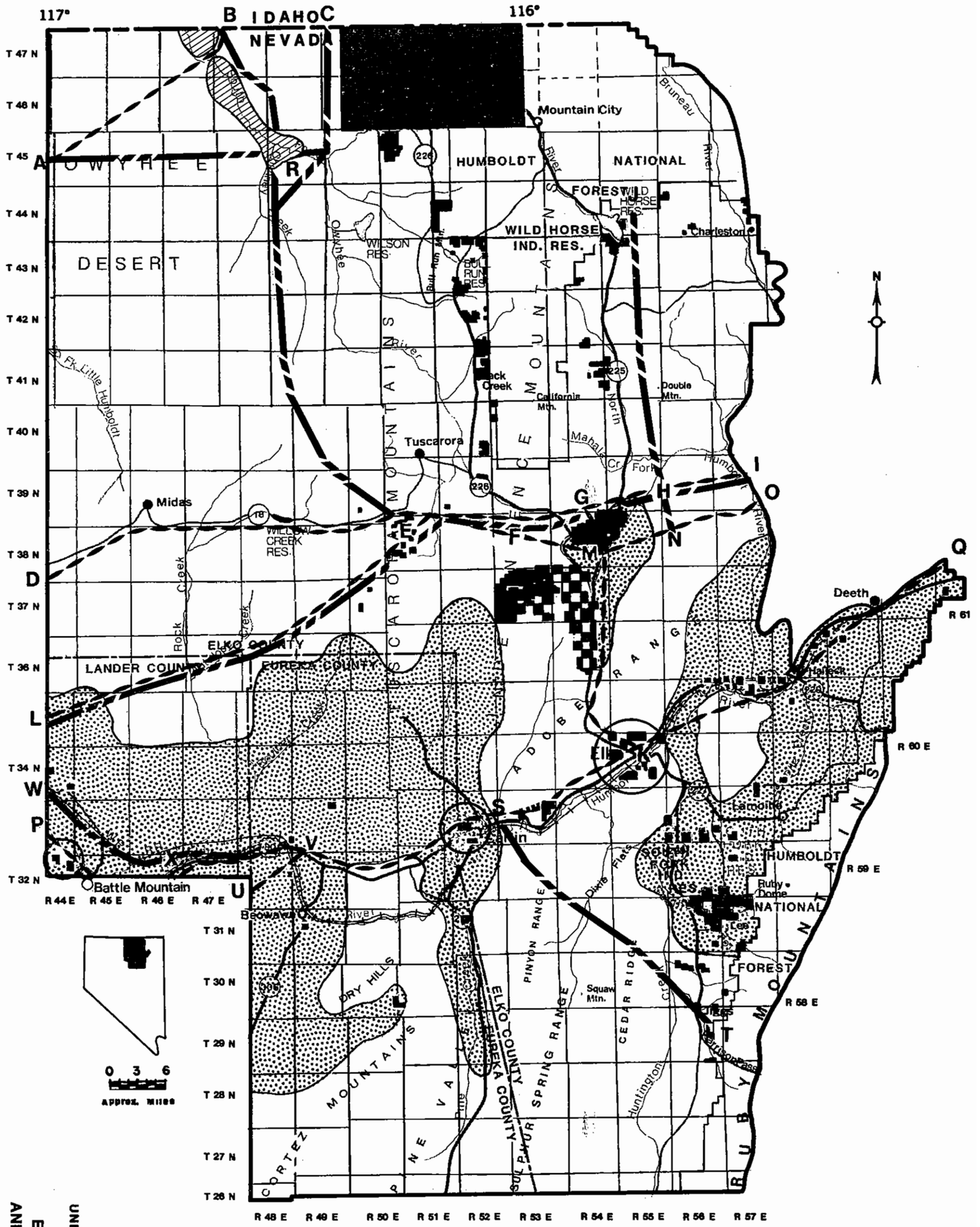
MAP REF. NO.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS 1/	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
129	Corral Cyn.	DY-1=2%	23	6	01/01-12/31(12)	63	17
130	Forest FFR	CDS-1=2%	4	1	04/01-11/15(6.5)	7	2
131	Pearl Cr.	DW-4=1%	2	1	11/15-03/15(4)	2	1
132	Rattlesnake Mtn.	DW-4=1%	2	1	11/15-03/15(4)	2	1
133	Lindsay Cr.	DW-4=1%	10	3	11/15-03/15(4)	10	3
		DY-1=9%	104	28	01/01-12/31(12)	312	84
134	Twin Cr. North	DY-1-(s)=1%	3	1	03/16-11/15(8)	5	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	13	6
135	Twin Cr. East	DY-1-(s)=1%	3	1	03/16-11/15(8)	5	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	14	6
136	Twin Cr. South	DY-1-(s)=1%	3	1	03/16-11/15(8)	5	2
		DY-1-(w)=1%	15	7	11/16-03/15(4)	13	6
137	Merkley FFR	DY-1=1%	18	9	01/01-12/31(12)	29	15
138	Red Rock	DY-1-(s)=11%	33	16	03/16-11/15(8)	65	31
		DY-1-(w)=11%	165	82	11/16-03/15(4)	162	80
		CDS-2=19%	133	68	03/16-11/15(8)	261	133
139	Browne	DY-1-(s)=4%	12	6	03/16-11/15(8)	24	12
		DY-1-(w)=4%	60	30	11/16-03/15(4)	59	29
140	Mitchell Cr.	DW-4=2%	4	1	11/15-03/15(4)	5	1
		DY-1=16%	184	50	01/01-12/31(12)	530	144
	Allotment A (Little Owyhee)	DW-6=48%	24	12	11/15-03/16(4)	24	12
	Allotment B (Bullhead)	DY-2=3%	126	63	01/01-12/31(12)	374	187
		CDY-2=1%					
		DS-4=4%	70	35	03/16-11/15(8)	139	69
		CDS-4=3%	N/A 2/	N/A		34,513	17,258

APPENDIX 4
TABLE 1 (Continued)
BIG GAME NUMBERS BY ALLOTMENT
ELKO RMP AREA

Map Ref. No.	ALLOTMENT	PERCENT OF BIG GAME USE AREA	REASONABLE NUMBERS 1/	EXISTING NUMBERS	SEASON-OF USE (MONTHS)	REASONABLE NO. AUM DEMAND	EXISTING NO. AUM DEMAND
				ANTELOPE			
1	Owyhee	AW-1=36% CAY-1=14%	204	102	01/01-12/31(12)	485	242
2	YP	AY-2=97%	97	49	01/01-12/31(12)	228	115
4	Indian Cr. FFR	AY-2=3%	3	1	01/01-12/31(12)	7	2
13	Rock Cr.	AY-1=14%	56	28	01/01-12/31(12)	101	50
15	Little Humboldt	AY-1=3%	12	6	01/01-12/31(12)	23	11
	Allotment A (Little Owyhee)	AY-1=29% CA-1=4%	132	66	01/01-12/31(12)	314	157
	Allotment B (Bullhead)	AY-1=6%	24	12	01/01-12/31(12)	57	29
			N/A 2/	N/A		1215	606
				CALIFORNIA BIGHORN SHEEP			
15	Little Humboldt	CBS=90%	18	--	01/01-12/31(12)	34	--
	Allotment B (Bullhead)	CBS=10%	2	--	01/01-12/31(12)	5	--
16	Twenty Five		20	--	01/01-12/31(12)	29	--
10	Lime Mountain		20	--	01/01-12/31(12)	24	--
1	Owyhee		10	--	01/01-12/31(12)	24	--
2	YP		10	--	01/01-12/31(12)	24	--
			N/A 2/			140	

1/ Reasonable and existing numbers, as determined in conjunction with Nevada Department of Wildlife (NDOW), were provided by big game use areas (i.e., DW-1). Reasonable and existing numbers by allotment are mathmatical calculations based on the percent of big game use areas occurrence within each allotment. This includes the assumption that reasonable numbers are uniformly distributed throughout the use area (biologically, this does not occur in big game populations). AUM demand is provided for analysis purposes only.

2/ Reasonable numbers cannot be added, since this may result in multiple counting of individual animals. Animals that summer on public lands may also winter on public lands while some animals may move/migrate to public lands outside of the planning area.



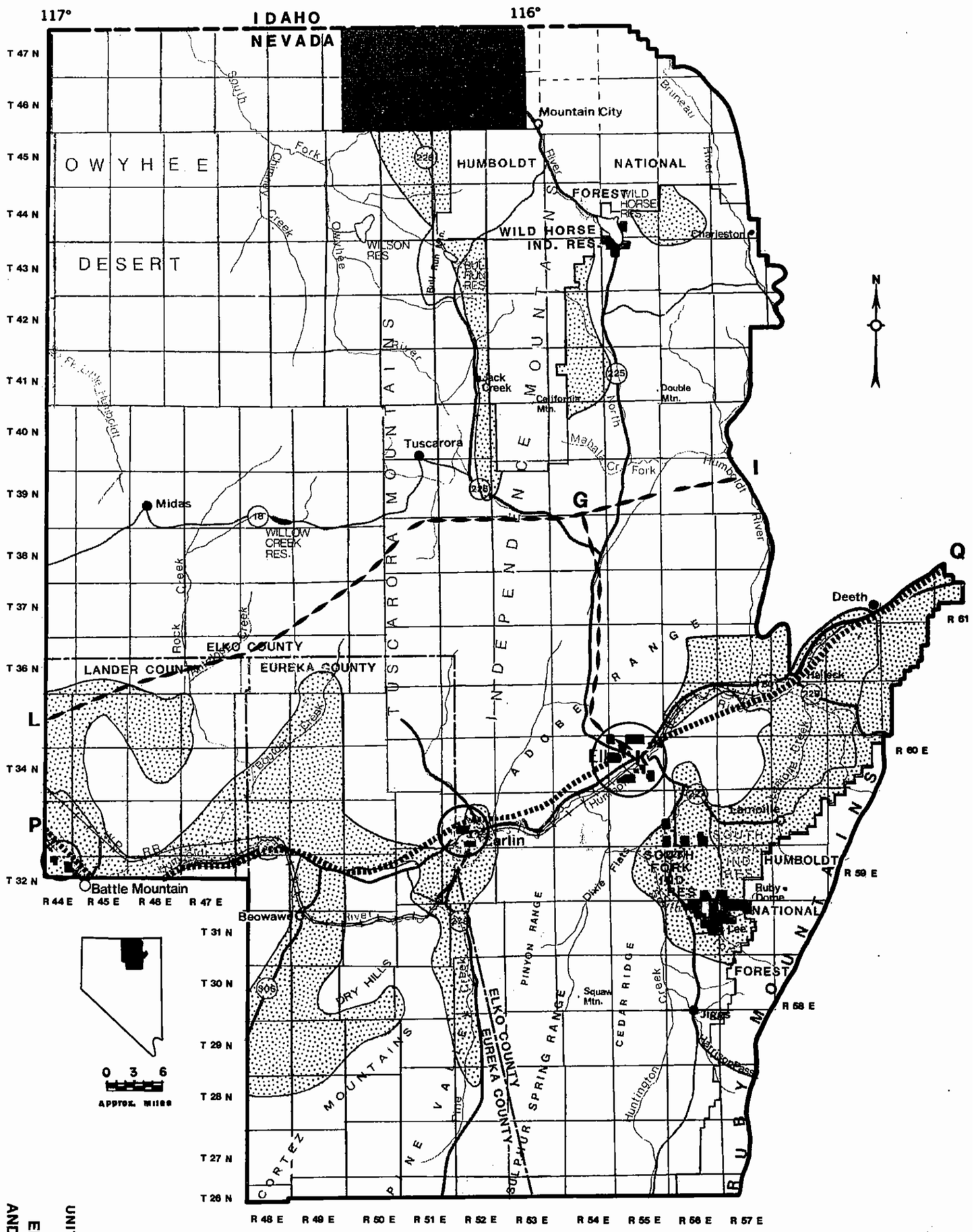
ALTERNATIVE B

- SALES (Community Expansion)
- SALES
- TRANSFER PRIMARILY BY EXCHANGE
- CENTERLINE OF DESIGNATED CORRIDORS (3 Miles Wide)
- CENTERLINE OF PLANNING CORRIDOR (5 Miles Wide)
- OWYHEE CANYONLANDS WSA

UNITED STATE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

LAND TENURE ADJUSTMENTS
AND CORRIDORS

1985



ALTERNATIVE C & E

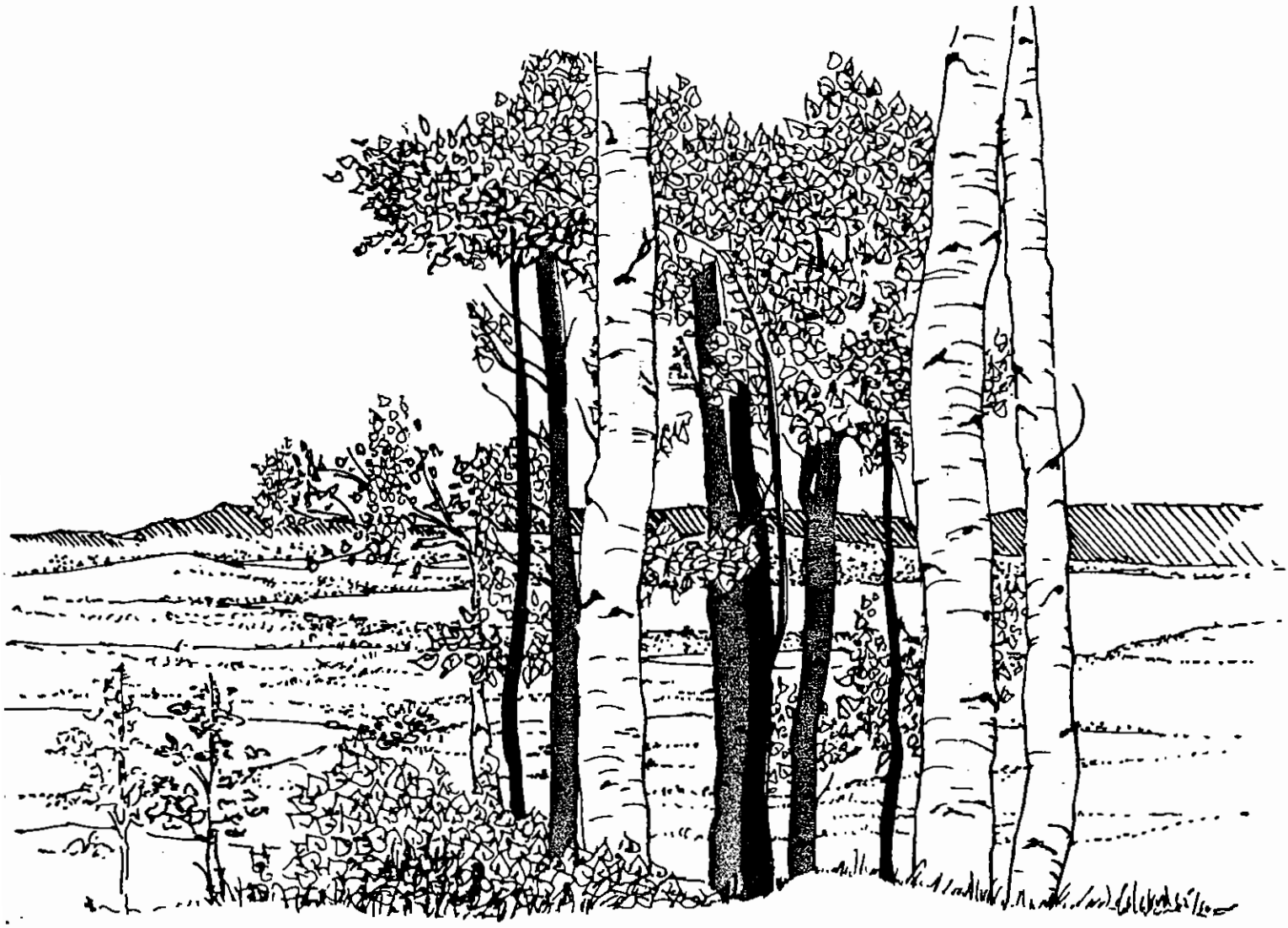
- SALES (Community Expansion)
- TRANSFER PRIMARILY BY EXCHANGE
- CENTERLINE OF DESIGNATED CORRIDORS (3 Miles Wide)
- CENTERLINE OF DESIGNATED LOW VISIBILITY CORRIDOR (3 Miles Wide)

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

LAND TENURE ADJUSTMENTS
AND CORRIDORS

1985

CHAPTER FOUR



CONSULTATION AND COORDINATION

The land use planning process for the Elko Resource Management Plan began with a Notice of Intent published in the Federal Register on November 9, 1983. On the same day news releases announcing the beginning of Issue Identification, the first step in the process, were published in local and regional newspapers. Letters requesting public input on issues and concerns were also sent to approximately 500 interest groups and individuals on November 9. Comments were received until April 2, 1984. A total of 37 comment letters and one telephone comment were received.

Representatives from BLM met with the Elko, Lander, and Eureka County Commissioners or county planning boards throughout the next six months to discuss the planning process and identify their concerns regarding resource uses in their areas.

This process resulted in the identification of 11 issues. Ten issues were retained with one issue being eliminated as the result of further study. The issues analyzed were: Lands and Realty, Rights-of-way Corridors, Legal Access, Recreation, Wilderness, Livestock Grazing, Wildlife Habitat, Wild Horses, Woodlands, and Minerals.

On April 19, 1984 a packet was distributed to about 450 groups and individuals requesting comments on the draft planning criteria and issues proposed for the RMP. A total of 19 comment letters were received between April 27 and June 11, 1984. These responses generally supported the proposed planning criteria and these guidelines were retained.

On October 19, 1984 a packet describing the draft alternatives was sent to approximately 500 individuals and groups, requesting their comments on the proposals. The public was requested to consider which management options were preferred, what criteria should be used in the development of the preferred alternative, and what significant impacts they felt would occur from implementing any of the alternatives. A total of 21 responses were received.

Bureau personnel also met with the county commissioners for Elko, Lander and Eureka counties during December 1984 to discuss the management actions associated with each alternative. Briefings were held for the District Grazing Board No. 1 and for representatives of specific interest groups.

Of those expressing a preference for a particular alternative; two specifically identified A (no change), six identified parts of A they preferred; two specifically identified B (emphasize commodity production), four identified parts (livestock, wildlife habitat, wild horses, woodlands, and minerals) of B they preferred; three wanted C (emphasize protection of fragile and unique resources), five identified parts of C (wilderness) they preferred; five specifically identified D (balanced use), seven identified parts of D they preferred; and one specifically identified Alternative E (no livestock grazing). Although the scoping process is not a vote count and the number of responses does not necessarily affect the selection process, Alternative D with some modifications including clarification of land tenure adjustment actions, corridor placement, refinement of wildlife habitat, and livestock management proposals, was selected as the preferred alternative during the analysis of the environmental objectives and policy guidance.

Changes were made to corridors as a result of consistency reviews with contiguous planning documents, specifically the Draft Owyhee Canyonlands Wilderness EIS. In response to comments on proposed alternatives in this draft wilderness EIS, a modification was made to the preferred alternative during the later stages of development. This change was integrated into the preferred alternative of the Draft Elko RMP/EIS to ensure consistency.

After considering public comment, Alternative B added a planning corridor along the same route as the proposed designated corridor segment E-L.

Public comments resulted in providing a wider range of wilderness alternatives. An additional level of wilderness recommendations was added to Alternative B.

PUBLIC REVIEW AND HEARINGS

A Notice of Availability for the Elko Draft RMP/EIS was published in the Federal Register on August 13, 1985 and was filed with the Environmental Protection Agency on August 7, 1985 thus opening a public comment period ending on November 15, 1985.

Public hearings were scheduled for October 3, 1985 in Elko, Nevada and October 4, 1985 in Reno, Nevada. These were announced in the Federal Register Notice, as well as through news releases to local newspapers and in a letter accompanying each Draft RMP/EIS mailed out to the public.

A total of seven persons attended the two hearings; two making oral presentations in Reno, and two in Elko.

Letters of comment were received from 27 persons, groups or agencies, including comment from the Governor's State Clearinghouse for Nevada.

Transcripts of the public hearings are available for inspection at the Elko District Office, 3900 E. Idaho Street, Elko, Nevada 89801.

AVAILABILITY OF THE DRAFT RMP/EIS

The Elko Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) was mailed to approximately 580 agencies, organizations, companies, and individuals who indicated an interest. The Draft RMP/EIS and the Elko Wilderness Technical Report were both available to the public upon request from the Elko District Office.

The Draft RMP/EIS was mailed to numerous governmental agencies and organizations for comment. These include, but are not limited to, the following:

I. GOVERNMENTAL AGENCIES AND INDIVIDUALS

A. Federal Agencies

- Advisory Council on Historic Preservation
- Department of Agriculture
  - Forest Service
  - Soil Conservation Service
- Department of Defense
  - Army Corps of Engineers
  - Bolling Air Force Base
  - Hill Air Force Base
- Department of Energy
  - Bonneville Power Administration
  - Office of Environmental Compliance
- Department of the Interior
  - Bureau of Indian Affairs
  - Bureau of Mines
  - Bureau of Reclamation
  - Environmental Protection Agency
  - Fish & Wildlife Service
  - Geological Survey
  - National Park Service
  - Office of Environmental Project Review
  - Offshore Environmental Assessment Division

B. Congressional Delegation

Senator Chic Hecht, Nevada
Senator Paul Laxalt, Nevada
Representative Harry Reid, Nevada
Representative Barbara Vucanovich, Nevada

C. State of Nevada

Governor Richard Bryan
State Assemblyman Byron Bilyeu
State Assemblyman John Marvel
State Senator Dean Rhodes

Department of Minerals
Division of Agriculture
Division of Historical Preservation & Archaeology
Division of State Parks
Division of Water Resources
Division of Wildlife
Land Use Planning Advisory Council
Multiple Use Advisory Board
Office of Community Services
State Communications Board

D. Local Governments

Carlin City Mayor
Carlin City Planning Board
Elko City Manager
Elko City Mayor
Elko City Planning Board
Elko County Manager
Elko County Commissioners
Eureka County Commissioners
Lander County Commissioners
Lander County Planning Commission
Jackpot Advisory Council

Copies of the Draft RMP are available for review at the following libraries and BLM offices:

II. PUBLIC LIBRARIES

U.S. Department of the Interior
Natural Resources Library
Gifts and Exchange Section
18th and "C" Streets, N.W.
Washington, D.C. 20240

Library, BLM
Denver Service Center
Denver Federal Center Bldg. 50
Denver, CO 80225

James Dickinson Library
University of Nevada, Las Vegas
4505 Maryland Parkway
Las Vegas, NV 89154

Government Publications Dept.
University of Nevada, Reno
Getchell Library
Reno, NV 89557

Nevada State Library
Library Building
401 N. Carson Street
Carson City, NV 89710

Elko County Library
720 Court Street
Elko, NV 89801

Eureka County Library
P.O. Box 21
Eureka, NV 89316

Lander County Library
Battle Mountain, NV 89820

White Pine County Library
Campton Street
Ely, NV 89301

III. BUREAU OF LAND MANAGEMENT OFFICES

Office of Public Affairs
18th and "C" Streets, N.W.
Washington, D.C. 20240

Nevada State Office
300 Booth Street
Reno, NV 89520

Battle Mountain District Office
P.O. Box 194
Battle Mountain, NV 89820

Carson City District Office
1050 E. William No. 335
Carson City, NV 89701

Elko District Office
P.O. Box 831
Elko, NV 89801

Ely District Office
Star Route 5, Box 1
Ely, NV 89301

Las Vegas District Office
P.O. Box 26569
Las Vegas, NV 89102

Winnemucca District Office
705 East 4th St.
Winnemucca, NV 89445

Idaho State Office
P.O. Box 042
Boise, ID 83724

Boise District Office
3948 Development Ave.
Boise, ID 83705

Burley District
Route 3, Box 1
Burley, ID 83318

Idaho Falls District
940 Lincoln road
Idaho Falls, ID 83401

Salt Lake District
136 East South Temple
Salt Lake City, Utah 84111

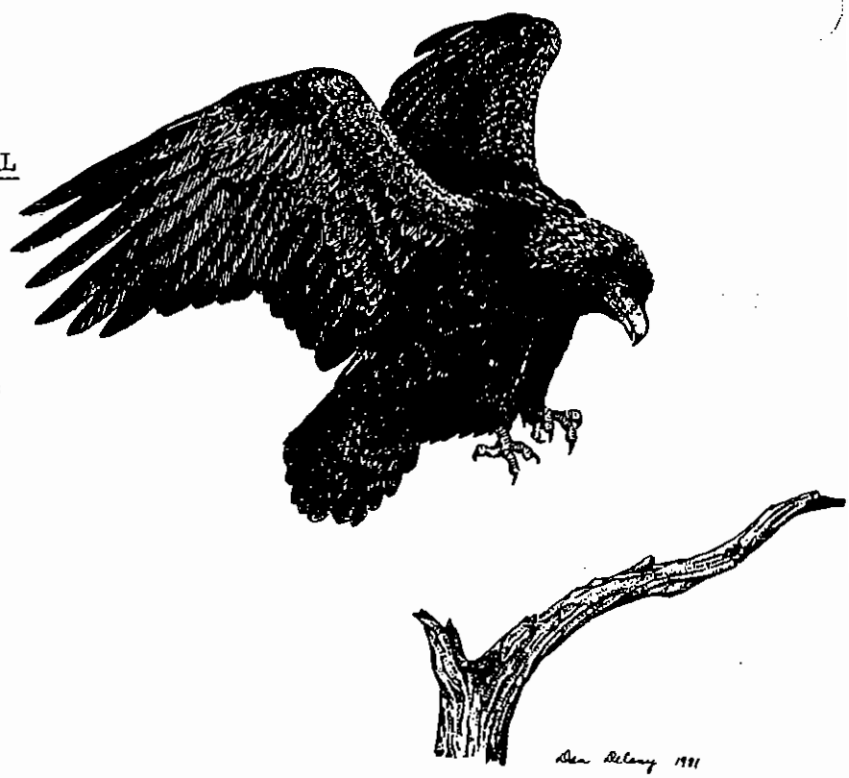
AVAILABILITY OF THE PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

This document has been mailed to all those who received copies of the Draft RMP/EIS, as well as those who commented on the document. A Federal Register Notice and news releases have been issued to inform the public of the availability of this document. A limited number of additional copies are available upon request from the District Office. Review copies are available at the listed BLM offices and public libraries. They are also available at Federal Depository Libraries.

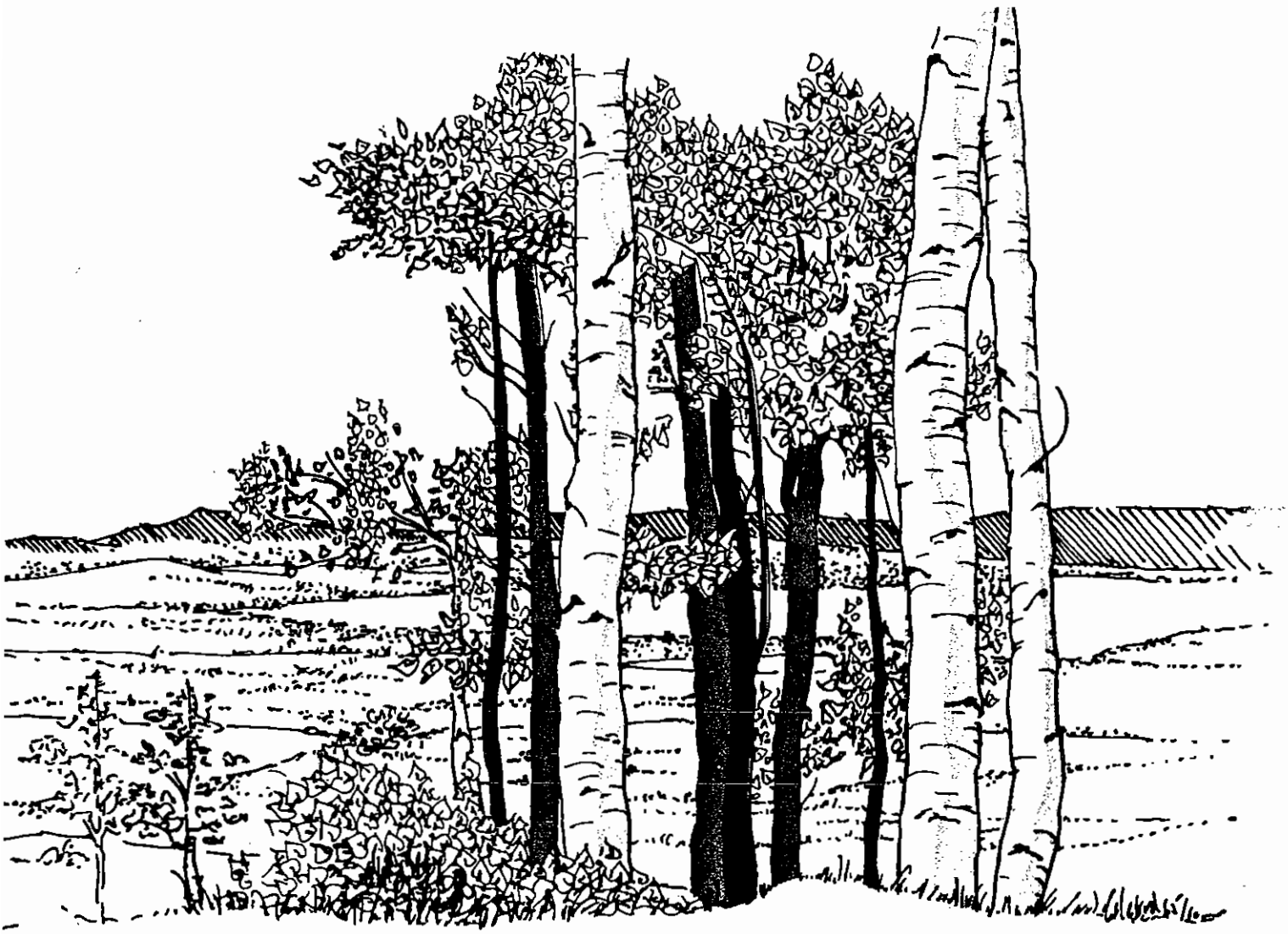
PUBLIC COMMENT ON THE DRAFT RMP/EIS

All substantive comments from the public hearings and all letters of comment are reproduced in this document except as noted. Responses have been prepared to comments which relate to inadequacies or inaccuracies in the analysis or methodologies used, identify new significant impacts, recommend reasonable new alternatives, involve disagreement on interpretation of significance, or indicate significant misconceptions or misinterpretations of Bureau programs and policies.

This section is divided into two parts. The first part includes comments and responses to the Draft RMP/EIS. The second part of this section contains the comments received from Governor Bryan following the State's Consistency Review of the Preliminary Final RMP/EIS.



COMMENT LETTERS AND TESTIMONY



COMMENTS AND RESPONSES TO THE DRAFT RMP/EIS

Letter No.	Commentor
1	USDI, Bureau of Mines
2	Reed Secord
3	Sierra Pacific Power Company
4	National Park Service
5	Bruce Mitchell
6	Grant T. Kien
7	Pete Tomera
8	Alan R. Wasner
9	Kenneth Nelson
10	Roy G. Jones
11	Lance McCold
12	The Wilderness Society
13	Nevada Grazing Board No. 1
14	Dean Rhodes
15	USDI, Geological Survey
16	Wells Rural Electric Company
17	Jiggs Conservation District
18	John Swanson
19	Elko County Conservation Association
20	Nevada State Office of Community Services
21	Elko County Recreation Board
22	Sierra Club
23	Minerals Exploration Coalition
24	Wildlife Management Institute
25	Amoco Productions Company
26	Environmental Protection Agency
27	Exxon Company, USA

Hearing Testimony

1-2 Nevada Grazing Board No. 1
1-2 Freeport McMoRan Company

Comment Letter 1

United States Department of the Interior

BUREAU OF MINES

WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

August 21, 1985

Memorandum

To: District Manager, Elko District Office, Bureau of Land Management, Elko, Nevada

From: Supervisor, Minerals Involvement Section, Branch of Engineering Studies

Subject: Draft Elko Resource Management Plan and Environmental Impact Statement

1-1 The report adequately and clearly assesses the mineral issues in the district except for one question. Will there be special access restrictions or special stipulations and requirements for mine operating permits in areas where other resources receive priority consideration, although mining claims can legally be staked? Experience has shown that management practice affecting access or requiring special stipulations in the mine permits tends to inhibit minerals activities. Sometimes these restrictions become so burdensome as to tend to preclude mine development.

An example of this question might be applied under Alternative A to the areas within one-half mile of the high water line around Wilson, Zunino/Jiggs, and Wildhorse Reservoirs and the rim-to-rim portion of the South Fork of the Owyhee River area. Will there be access restrictions for mineral exploration or development on locatable minerals? Will there be special stipulations on mine development attached to mine permits in these areas, or will there be only standard stipulations as elsewhere in the district?

These questions could be addressed and clarified in Chapter 4 under the consequences of each alternative. As the draft now appears, the reader must assume no access restrictions on exploration or mining and no special requirements will be incorporated in mine operating permits if the area is legally available to claim staking. Clarification is needed.

Response Letter 1

1-1 At the project level as directed by requirements within 43 Code of Federal Regulations 3809, special stipulations and/or reclamation requirements are currently developed for each mining notice or plan-of-operations. The RMP will not change these standard operating procedures, however, under Alternative D special access restrictions consisting of travel limited to existing roads and trails will be implemented on 18,860 acres, exclusive of designated wilderness areas. The limited areas consist of Special Recreation Management Areas. It should be noted that a significant portion of the 18,860 acres consists of streams and reservoirs.

Comment Letter 1

You might be interested in how the Forest Service has addressed these questions in their land plans. They have divided their land into four categories, depending on degree of restriction. An example copy from the Beaverhead National Forest of their four categories is enclosed.

D'Arcy P. Banister

Enclosure

Comment Letter 1

Category A — Withdrawn or proposed for withdrawal from mineral entry.
1. Wilderness areas.
2. Wild and scenic rivers
3. Sites for facilities
4. Historic and cultural sites
5. Developed recreation sites.

Category B — Statues or executive orders require specific protection or mitigation measures.

1. Proposed wilderness areas.
2. Congressionally mandated wilderness study areas.
3. RARE II Further Planning areas.
4. T&E Species.
5. Roadless (Type 1) dispersed recreation areas.
6. Culturally significant areas.

Category C — Special conditions exist on lands which require special lease stipulations or plan of operation conditions.

1. Big game winter range.
2. Elk calving area.
3. Riparian area.

Category D — Standard lease stipulations and plan of operation conditions apply.

1. Timber production areas.
2. Existing mineral processing areas.

Comment Letter 2

2921 NE 43rd Street
Lighthouse Point, Florida 33064
August 27, 1985

Bureau Of Land Management
Elko District Office
ATTN: RMP Team Leader
P.O. Box 831
Elko, Nevada 89801

Dear District Manager:

Regarding the Elko Wilderness Technical Report, I support the establishment of four wilderness areas (Rough Hills, Little Humbolt River, Cedar Ridge, and Red Spring). The entire wilderness study areas should be designated wilderness. The areas are important for sandhill crane, bald and golden eagles, mule deer, and various furbearers.

It is important that these areas be preserved as wilderness for their primitive, scenic, recreational, and wildlife values. Thank you for this opportunity to comment.

Sincerely,

Reed Secord

Comment Letter 3

Sierra Pacific Power Company

JACK L. BYROM, P.E.
Vice President-Engineering

September 4, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Dear Mr. Harris:

We have received and reviewed the Draft Elko Resource Area Resource Management Plan (RMP) and Environmental Impact Statement. Our review was keyed on utility corridor designation and wilderness recommendations, as well as other plan contents with potential to impact energy development and transmission. We realize that formulation of sound land management plans becomes more complicated as the range of issues and numbers of interest groups increase. Sierra Pacific makes every effort to maintain an objective and reasonable stance on land use issues.

From the standpoint of overall equity in resource allocation, Sierra Pacific concurs with Alternative D, the preferred alternative of the RMP. The ten major issues identified and evaluated, including land tenure, corridors, and wilderness, are handled logically and consistently. Sierra Pacific is particularly pleased with the excellent treatment given the utility corridor issue, and we consider the Elko RMP a model document in this regard. I hope you, the planning team leader, and all of the participating staff will accept our congratulations for a job well done.

Please let us know whenever we may be of assistance.

Sincerely,

Jack L. Byrom

JLB/JL/ro

cc: BLM State Director
Southern California Edison Co.

P.O. BOX 10100/RENO, NEVADA 89520-TELEPHONE 702/789-4832

Comment Letter 4

United States Department of the Interior

NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:
L7619 (WR-RPE)

October 10, 1985

Memorandum

To: District Manager, Bureau of Land Management, Elko, Nevada
Attention: RMP Team Leader

From: Regional Director, Western Region

Subject: Draft Elko Resource Management Plan and Environmental Impact Statement (DES-85/37)

In accordance with your State Director's Memorandum of August 7, 1985, we have the following comments relating to the treatment of cultural resources in the subject Plan and DEIS.

4-1

1. The Draft Management Plan and DEIS do not adequately address cultural resources in that:

   (a) The initial chapter to the document, "Summary of Management Actions" (Pages S-1 through S-9), fails to include cultural resources as a management activity.

   (b) Cultural resources were not cited in the References section of the volume. At a minimum, the Nevada State Plan for cultural resources should be referenced.

   (c) The appendices include tabular and other data on recreation, livestock/grazing/range issues, ecological/biological concerns, and minerals, etc., however, nothing is included on cultural resources.

   (d) The Management Plan and DEIS evaluate the consequences and make recommendations for all five (5) proposed alternatives under consideration. Cultural Resources are not discussed in any of the alternatives.

4-2

2. While Page 2-36 addresses compliance procedures and notes that a 1980 Programmatic Memorandum of Understanding exists between the Bureau of Land Management and the Advisory Council for Historic Preservation, the Overview of cultural resources presented on Page 3-27 is superficial when compared to other significant natural resources and concerns the Bureau must consider. As examples:

Response Letter 4

4-1 The Elko Draft RMP/EIS has been prepared in conformance with the President's Council on Environmental Quality Regulations. It is the Council's policy "... to reduce paperwork and the accumulation of extraneous background data, and to emphasize real environmental issues..." (40 CFR 1500.2(b)). Since cultural resources were not an issue in the Elko Resource Area, they were not discussed in detail. CEQ regulations state: "There shall be only brief discussion of other than significant issues." (40 CFR 1502.(b)) (emphasis added).

Cultural resources are adequately covered under the section "Management Guidance Common to all Alternatives": on page 2-36. Within the discussion it is stated that "Prior to project approval, intensive field inventories will be conducted in specific areas that could be impacted by implementing activities." The basis of management will be legal compliance and Bureau policy.

4-2 See response to 4-1. Also, as stated on page 3-27 of the Draft RMP/EIS, there has been no Class II inventory undertaken on the planning area. The level of data provided by the Class I inventory is not specific enough to make management decisions. The Bureau has relied on the process of site specific surveys at the time an action is being considered to ensure compliance with the mandates within the National Historic Preservation Act of 1966, as amended and the National Environmental Policy Act of 1969.

Comment Letter 4

(a) The Overview should include a summary of the prehistoric and historic sites including inventories conducted to date; a breakdown of the number and types of sites already identified in previous surveys; the number and types of sites already determined eligible or potentially eligible for nomination to the National Register of Historic Places; and potential impacts to National Register or eligible properties.

(b) Management options, benefits and potentially adverse impacts to cultural resources should be discussed for each alternative presented.

(c) The cultural resources portion of the Management Plan should provide a series of projected (5-year) management directive/objectives/alternatives with a discussion of how each directive will be implemented. These directives should be evaluated on an annual basis and revised as needed. The directives and objectives should be articulated with the overall Nevada State Historic Preservation Plan.

4-3 3. The Plan and DEIS do not address Native American issues, concerns, or any coordination with such groups.

We appreciate the opportunity to review and comment upon this draft Resource Management Plan and DEIS.

Howard H. Chapman

cc:
National Register Programs - IAS
WASO (762)

Response Letter 4

4-3 Please refer to page 6-2 of the Draft RMP/EIS which states that public contacts include, but are not limited, to those listed in Chapter 6.

Consultation was initiated and repeated in compliance with 43 CFR 1610.3 with groups, agencies and individuals representing Native American interests, including the Intertribal Council of Nevada, the chairperson of the TeMoak Bands of Western Shoshone, the planner for the Shoshone-Paiute Tribe, the Western Shoshone National Council (based in Lee, Nevada) and their legal representatives.

The plan reflects any resource management concerns or issues that were identified throughout the scoping process concerning Native Americans.

Comment Letter 5

U.S. DEPT. OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO NEV.
ATT. TIM HARTZELL, MANAGER
ELKO RESOURCE AREA

TIM,

5-1 THIS LETTER IS A REQUEST THE B.L.M. TO ALTAR THE PROPOSED DISPOSAL LAND BOUNDRY TO OMIT IN ITS ENTIRETY THE L.D.S. ALLOTMENT AT TWIN BRIDGES.

I PROPOSE THAT IF YOU WERE TO DO THIS THE ELKO NEV. STAKE WELFARE RANCH WOULD BE INTERESTED IN CONTRIBUTING TEN THOUSAND ($10,000) DOLLARS TOWARDS SEEDING APPROX. ELEVEN HUNDRED (1100) ACRES OF THE ALLOTMENT.

I BELIEVE THIS WOULD GREATLY INHANCE THE POTENTIAL AVAILABLE FOREGE WHICH WOULD WORK TOWARDS THE MUTUAL BENEFIT OF THE B.L.M. AND THE RANCHES OPERATION.

THIS, OF COURSE, IS WITH THE UNDERSTANDING THAT THE L.D.S. ALLOTMENT WOULD BE FREE OF SHEEP TRAILING THROUGH IT.

SINCERELY
BRUCE (WAGGIE) MITCHELL
MANAGER, ELKO NV. STAKE WELFARE RANCH

Response Letter 5

5-1 The Land Tenure Adjustment and Corridor Map for the Proposed Plan (in this document) has been modified to exclude the LDS Allotment.

Comment Letter 6

(1)

332 Spring Creek Pkwy
Elko, Nevada 89801
Oct. 28, 1985

Dear Elko District (BLM):

Please consider the following as my personal comments on your Draft RMP & EIS for the Elko Resource Area. My main personal concern in all BLM land use plans is for wildlife & wilderness.

First, I support Alternative "D" with regards to wilderness: both Rough Hills & Little Humbolt WSA's are superb candidates for inclusion in wilderness System

I am against all of your Alternatives on ORV use; I do not feel you should give carte blanche permission to drive "anywhere" 97-98% on BLM lands: while we do not have a ORV problem yet like in southwest BLM lands, eventually off-road races & dune buggy use may come to Elko; while enforcement to drive on existing roads is difficult, I think "within reason" this should be supported by BLM before a sensitive wildlife area (e.g. Sage grouse strutting grounds) is destroyed (before it is brought to your attention!)

Comment Letter 6

(2)

I support Alternative "C" regarding wildlife habitat particularly with its proposal to manage 191 mls of riparian habitat. Until riparian management is a reality & the livestock industry is truly complying with preservation riparian ecosystems, I feel No increase in livestock numbers or AUM's should be considered. For much too long so called "multiple use" of BLM lands has been in reality single use i.e. Livestock! I feel the whole character of the BLM has to change in this respect.

1) Set grazing fees at Fair market value
2) Abolish grazing boards (decisions should be made by BLM staff scientifically NOT politically by Livestock operators)
3) BAN Grazing in damaged riparian areas until wildlife staff at BLM feels reintroduction of Livestock is possible
4) All Land use decisions within staff of BLM should be consensus of wildlife & "range cons"

Comment Letter 6

(3)

I personally feel the caricature of range-management staff needs to change — these people trained in land-grant colleges that cooperate with livestock industry are carrying over this affiliation into BLM land use decision (i.e. in their emulation of cowboys. The range cons are given more authority than a recreation, wildlife, or archeologist specialist an staff that does not walk around pretending to be a cowboy.

I feel grazing is a legitimate use but only if it is given equal status to other public uses [not in preference to other uses]. Decision on land use have to be made on sound scientific ground (e.g. grazing monitoring) not politically (e.g. grazing boards).

Economically, Elko county will fair better with diversity of BLM uses (i.e. recreation generates lots of income for the area + needs esthetically pleasant lands —

Comment Letter 6

(4)

wildlife, riparian zones, vegetative complexity — NOT monoculture crested wheat!)

Thank you,

G.T. Klein

Comment Letter 7

October 30, 1985

Dear Mr. Hartzell,

I am writing to request that part of the native portion of the Twin Bridges Allotment be seeded in crested wheat. Since the State has appropriated part of the original crested wheat seeding and since the native feed by no means equals a good crested wheat stand, a seeding would greatly benefit our ranching operation. There are about 1550 acres in that allotment that could be seeded.

7-1 We will put up $10,000.00 toward this seeding. Since this ground is in the BLM disposal area, we request a boundary change so this ground would be excluded from the disposal area. Since we have built the fences around and separating the allotments, and if we pledge money toward the seeding, we'd like to be assured the use of the ground indefinitely. If it's at all possible, we'd like this project completed in the Fall of 1986.

Regarding the proposed re-establishment of the sheep trail through the area, if there is no way we can keep them out entirely and if we put up money to seed the ground, there must be some stipulations.

1. The sheep must be kept to a ¼ mile strip at the extreme western edge of these allotments, then follow the old county road up over 10-Mile Mountain.

2. Only one sheepman could come through in the Spring and one in the Fall, with a limit on the number of sheep.

3. The sheep could never come into or graze on the crested wheat.

4. The sheepman couldn't camp his band in these allotments overnight.

Your consideration of these matters would be greatly appreciated.

Sincerely,

Pete Tomera

Pete Tomera
P.O.Box 276
Battle Mountain, Nevada
89820

Response Letter 7

7-1 The Land Tenure Adjustment and Corridor Map for the Proposed Plan (in this document) has been modified to exclude the Twin Bridges Allotment.

Comment Letter 8

Dear Folks:

I am writing in response to the Draft Elko Resource Area Management Plan.

I very much support Alternative C.

I would really like to see the Little Humboldt River WSA become a Wilderness Area. This is a unique area where I once spent most of a summer.

Also, I would really like to see the Rough Hills WSA become a Wilderness Area. This area at the headwaters of the Bruneau River is one of my favorite places in Elko County. I'd really like to see it set aside.

Both these areas are, in my opinion, good "museum pieces" of a landscape that we should set aside in its natural state. We have plenty of roads in Elko County, and it would be a good idea to protect AT LEAST these two areas from further development. I would like to see all 66,754 acres beome Wilderness.

I would also like to see as part of the final plan more protected watershed areas, ie.: fenced springs and riparian habitats not only with a mind to wildlife but also to people who need potable water. I would like to see set quantities and acreage goals for this as opposed to vague statements such as, "improve riparian area quality by 30%".

8-1 I did not see much mention of watershed management in this document. In the driest state in the nation I would think that watershed management would be much more of an issue, and I do not understand why it was not addressed more fully.

Sincerely,

Alan R. Wasner

Alan R. Wasner
798 5th St.
Elko, NV 89801

11-7-85

Response Letter 8

8-1 During the issue identification phase (Step 1 - See Chapter 1) of the planning process, watershed was considerd as an issue for the sole purpose of considering management actions on a watershed northeast of Carlin, Nevada. After further analysis, however, it was determined that the source of the water in the area was on private land and that due to the interspersed nature of land ownership (within the "checkerboard") the possibility of being able to control actions in this area did not exist.

Within the section "Management Guidance Common To All Alternatives" the section on "Watershed" page 2-35 of the Draft RMP/EIS discusses the implementation of watershed management plans. Compliance is required by Federal agencies with the existing Executive Orders 11988 and 11990 controlling management actions within floodplains and wetlands.

Comment Letter 9

October 23, 1955

Kenneth Nelson
Högenvägen 145
430 50 Kållered
Sweden

Dear Ms Phelps,

I have reviewed the draft RMP/FIS for the Elko Resource Area and offer the following comments:

Lands and Realty

Recommend Alternative D (with suggested modifications)

There should be more flexibility in the amount of acreage identified as suitable for transfer, especially within the checkerboard land pattern. The major lands issue facing the Elko Resource Area, particularly in the

Comment Letter 9

long term, is the proper management of this area. The problems inherent in this task are common knowledge and need not be dwelled upon. Efficient management by the private landowner and Federal land manager requires the blocking of public and private lands into contiguous units. As passage of Federal legislation allowing large adjustments of acreages seems unlikely and probably undesirable from a management standpoint, the only tool remaining to accomplish this is the land exchange process.

The lands identified in Alternative D provide a good basis for this opportunity but could be expanded, for example, to include lands north and east of the Adobe Range, lands within the Spring Creek area (T. 35 N, R. 56 & 57 E.), lands east of SH 278 and west of the Pinion Range, and lands west and southwest of the proposed South Fork Humboldt River SRMA.

It should be remembered that by merely identifying the lands as

Comment Letter 9

(3)

suitable for exchange does not mean a proposal will be worked to completion. As stated on page 2-26 in the narrative, "Land tenure adjustment would be subject to a detailed analysis." With this in mind it is reasonable to assume that the environmental assessment process, coupled with the critical factor of whether or not the exchange is in the public interest, would allow only those actions which meet the above criteria to be processed. It is no secret that a land exchange is a long and arduous task. However, until something better comes along it remains the only means available to accomplish blocking of lands. To stimulate interest, more desirable lands must be made available, otherwise the checkerboard land pattern will remain difficult and costly to manage for all parties concerned.

2. Large blocks of private land are included within the areas identified as suitable for transfer, particularly

Comment Letter 9

(4)

in Boulder Valley and the area located roughly east of Spring Creek and south of Death. It is unrealistic to assume that adjustments would occur within these areas and only confuses the reader as it gives the impression that more land is available for transfer than actually exists. Isolated public lands within these areas could be identified for sale if disposal is indicated.

9-1 3. The "sales" label and "transfer primarily by exchange" label contained on the map for Alternative D are ambiguous. The reader can assume that something other than exchanges would be acceptable in that category. The document should clearly point out what as to what disposal actions would be acceptable in that category and what criteria would be used to make such a determination. I would suggest combining the two categories and assigning a label that indicates all forms of disposal would be considered. For example, "Land Tenure Adjustment Area."

Response Letter 9

9-1 This has been clarified in this Final RMP/EIS. Please refer to Chapter 3 "Revision and Errata" for an expanded description of proposals for these areas.

Comment Letter 9

5

9-2 4. No map illustrating Alternative A was included in the draft. It is difficult for the reader to make comparisons between the various alternatives without having some idea of the situation as it presently exists. The lack of a map also implies that no planning criteria was available when making disposal-related decisions.

9-3 5. Lands identified for sale in T. 33 N., R. 53 E., should be retained in public ownership. The lands in Corbin Canyon are in proximity to unique geologic features and possess riparian and recreational values. An opportunity exists here for development of an interpretive and recreational site in cooperation with the state of Nevada. The remaining lands are located in a crucial deer winter habitat area and may possess scenic values to travellers on I-80.

Corridors

Recommend Alternative D

Response Letter 9

9-2 The description of the alternatives on page 2-1 states that actions would be taken on a case by case basis as circumstances warrant. No map was prepared because the future proposals are unknown.

9-3 The Land Tenure Adjustments and Corridors Map (included in this document) for the proposed plan has been amended as suggested.

Comment Letter 9

This alternative appears to accomodate industry's future needs. However, at some point in the future it may be desirable to have a corridor (3 miles wide) to channel major rights-of-way to the southern portion of the resource area (and beyond).

Legal Access

Recommend Alternative D

In order to allow public utilization of the public lands legal access must be obtained where deemed necessary.

Recreation

Recommend Alternative C.

Assuming adequate funding, the public lands surrounding Wildhorse Reservoir should be retained in public ownership and managed for recreational use. Any development to this end should be coordinated with the State and Wild Horse Indian Reservation.

Comment Letter 9

Wilderness

Recommend Alternative D

Cedar Ridge and Red Spring Wilderness Study Areas are not suitable for wilderness and should be released from that designation. The areas should then be intensively managed for woodland products and wildlife. Anticipated oil & gas exploration should be monitored carefully to prevent unnecessary surface disturbance.

Livestock Grazing

Recommend Alternative D

Approximately 66% of the grazing allotments monitored are in a "downward" or "not apparent" (static) trend. This indicates that range condition in general is not improving to a substantial degree. Any increase in preference must be justified by careful monitoring.

Appendix 3, Table 1

Comment Letter 9

(8)

Wildlife Habitat

Recommend Alternative D

1. Wildlife and its habitat should always take precedence when considering grazing systems and treatments, range improvements, and other vegetative manipulations. I strongly support the reintroduction of bighorn sheep into the resource area.

2. A poor rating of 66% for those streams inventoried is also an indicator of the generally poor range condition throughout the resource area. Riparian habitat must be improved to impede the substantial amounts of topsoil lost annually through erosion, as well as to reestablish fisheries and associated aquatic habitat.

Wild Horses

Recommend Alternative D

In view of the present range condition,

Comment Letter 9

(9)

populations should not be allowed to increase above the current levels.

Woodland Products

Recommend Alternative D

The increasing demand for woodland products (especially firewood) necessitates an intensive management program based on sustained yield methods. Also, special attention must be given to the management of aspen stands if this species is to remain viable throughout the resource area.

Minerals

Recommend Alternative D

The release of Cedar Ridge and Red Spring WSA's from wilderness designation and the opening to oil & gas exploration should offset any adverse impact arising from the inclusion of the Little Humboldt River and Rough Hills WSA's into

Comment Letter 9

the National Wilderness Preservation System.

Thank you for the opportunity to comment on these issues. As the RMP will direct the Elko Resource Area's management efforts for the next 20 years, I hope that my comments will provide some guidance towards an effective and efficient accomplishment of that task.

Sincerely,

Kenneth Nelson

Comment Letter 10

11/11/85

Dear Mr Harris,

I have recently had the opportunity to review the Elko Resource Management Plan and Environmental Impact Statement and wish to submit my comments concerning it. I feel the alternative finally adopted should continue to be managed land in such a manner to allow multiple use yet provide for some wilderness designation and eliminate overgrazing, if present. In my mind the most important issue (and goal) should be the restoration of riparian habitat. If deemed possible I have no objection to increased grazing in those areas able to support it but hope the BLM will take the

Comment Letter 10

2

action necessary to protect (and restore) critical riparian habitat.

Alternative A because it provides for no wilderness and Alternative E because it eliminates grazing are, of course, unacceptable. (I'm puzzled why the BLM even proposed these obviously unacceptable alternatives as they have no chance or reason to be adopted?) I am opposed to alt. B. as it contains too little wilderness, inappropriately increases livestock AUM's and most importantly manages only 52 miles of riparian habitat. To me Alt. C is acceptable except that too much wilderness is designated and calls for an increase in the horses by 100%! 10-1

Response Letter 10

10-1 The alternative of no action, or continuation of existing use levels, is included in the Draft RMP/EIS in compliance with existing regulations. See 40 CFR 1502.14(d). The alterative of eliminating all livestock grazing (Alternative E) was presented to provide a basis for comparison.

Comment Letter 10

3

To be brief I support Alt. D with following changes:

Wilderness - Rough Hills 6,685 Ac
Little Humboldt 42,213 Ac
48,898

Livestock I support continued license at present level (305,247 AUMs) I would also support a 30% increase if monitoring supports. Monitoring should be done and if the monitoring indicates overgrazing then a decrease should occur.

Wildlife - Manage 191 miles of riparian/stream habitat as in Alt C.

Thank you. Roy Jones

ROY G. JONES M.D.
2085 Ruby View Drive
Elko, Nevada 89801

Comment Letter 11

8552 Bear Dr
Knoxville TN 37923
November 4, 1985

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

Dear RMP Team Leader,

I have carefully read and reviewed the Elko Resource Area RMP and EIS over the past four weeks. The RMP/EIS obviously reflects a large amount of work. I thank you for your efforts.

There are a number of ways the document could be improved. I will attempt to describe some of these improvements below. ~~My~~

My first concern is for transfers of lands out of public ownership. The general policy of exchanges to consolidate public lands makes sense. Also transfers those where public lands are scattered makes sense. However, many of the lands to be disposed of are near Humboldt National Forest Lands while there remain private inholdings within the National Forest.

11-1 Have you considered and would it be possible to exchange scattered BLM lands for private inholdings on the Humboldt NF? At the very least should scattered BLM lands which are close to the Humboldt NF not be transferred to the NF so they can make exchanges to eliminate inholdings? Also, ~~does~~ why are lands identified

11-2 as crucial wildlife habitat destined for transfer to private owners?

4-26

Response Letter 11

11-1 The Bureau does not solicit exchanges of BLM administered lands for private inholdings on National Forest lands. The preferred alternative has identified isolated parcels near the National Forest Boundary for transfer primarily by exchange. This, however, does not guarantee they will be used to acquire Forest Service inholdings. Any exchange that will result in acquisition of lands having greater than or equal resource values will be considered. Although not addressed by this RMP/EIS,a bill has been introduced to transfer administrative control over about 3,000 acres in the planning area (14,000 acres Districtwide) to the Humboldt National Forest. These lands are BLM administered lands that adjoin the Forest boundary and would probably be retained for multiple use management. Specific designation of the isolated parcels for exchange for NF inholdings could be accomplished through transfer to the NF by legislative action or administrative withdrawal. Either of these options must be initiated by the National Forest.

11-2 Your concern has been accommodated as the land tenure adjustment map has been modified to exclude minor amounts of crucial wildlife ranges. The public lands identified for transfer in the preferred alternative and carried forward in the proposed RMP that contain crucial wildlife habitat are isolated parcels that are difficult and costly to manage (the exception are limited lands identified for community expansion sales around the City of Elko). The majority of these parcels are identified for transfer primarily by exchange. This will permit acquisition of land of at least equal or greater value as stipulated in Section 203 of the Federal Land Policy and Management Act (FLPMA). All land exchanges that occur within important wildlife areas are coordinated with the Nevada Department of Wildlife.

Comment Letter 11

11-3 My second concern is with utility corridors. No explanation is given ~~for~~ of the rationale for selecting the indicated corridors. In my opinion corridors should avoid crucial wildlife habitat and cultural sites, follow existing roads and highways, and be located on privately owned lands. The reasons for all these criteria except the last are obvious. Utility corridors should be located on private lands because such corridors always serve economic purposes and private land owners are better able to collect rents for use of their property than is the Federal Government. Where utility corridors are not located by the above criteria, the overwhelming need to violate the criteria should be established. The EIS/RMP notes some losses which would result from some corridors but does not ~~[illegible]~~ show that the benefits outweigh the costs.

The EIS/RMP discusses wild horses but fails to make clear that they are not a native North American species. Much of the public support for feral horses exists because people have the mistaken idea that they are a native species. The document should explain the wild horses' status as an exotic in at least two places. Further, instead of calling them wild horses which implys native, they should be called feral horses which better suggests their exotic status. Finally, I would find any increase in wild horse herd unacceptable.

Response Letter 11

11-3 Chapter 4, Environmental Consequences p. 4-29. Corridors states "This alternative provides a balance between environmental constraints and industry needs" (as identified in the Western Regional Corridor Study) "without duplicating corridor routes." We were guided in our elimination of corridor routes by a desire to limit corridor designations to actual needs and consideration of resource impacts.

Comment Letter 11

Riparian area management is another concern. The proposed alternative (D) would greatly improve the condition of inventoried streams. However, please explain how or why it is acceptable to have 95 miles of streams in fair or poor condition. The discussion of riparian areas has other problems. The 212 miles of riparian habitat apparently refer to streams. However, the condition of the 2500 springs and the uncounted miles of intermittent and ephemeral streams don't seem to be discussed even though they are important riparian areas. These areas need to be studied and given proper protection. Very clear justification should be given for leaving any of these areas in less than good condition.

11-4

On page 3-24, the comment is made that "Prevailing attitudes on wildlife seem to support the concept of huntable numbers, provided these numbers do not come at the expense of reduction in AUM's for livestock." This "provision" is an inappropriate restriction on BLM management options. Multiple use does not mean what ever does not conflict with grazing AUM's. Multiple use means management for the "combination (of uses) that will best meet present and future (public) needs. Management for livestock grazing with compatible uses is management for a special interest group not for the public good.

Response Letter 11

11-4 The 117 miles of habitat improvement represent those areas identified by the Nevada Department of Wildlife as high priority, including those streams necessary for Threatened and Endangered Species Management.

Our proposed management actions include those techniques proven to be effective in the improvement and protection of riparian habitat and can be found on page 2-33 of the Draft RMP/EIS.

The selection of the proposed alternative and its association impacts is consistent with FLPMA (Sec. 103(c)) which requires the Bureau to manage the public lands and their values, so that they are used in a combination that will best meet the present and future needs of the American people.

See Chapter Three, Revisions and Errata for additional information on springs.

Comment Letter 11

Another weakness of the EIS/RMP is its handling of economics. The economic results of the various options should be estimated. The economic value of all resources should be included. The staff of the Humboldt National Forest could do lots to help Elko District personnel with economic calculations. Clearly economics is not the whole story but it should be open at the decision process. The EIS is wholly inadequate in its treatment of economics 11-5

The Elko District has a very large job in managing over 3 million acres of public land and has obviously put much effort into preparing the RMP/EIS. It is clear that much more work is yet needed. I hope my comments have been helpful. Please keep me informed of planning activities in the Elko District. Thank you.

Sincerely

Lance McCold

Lance McCold

Response Letter 11

11-5 It is the Bureau's position that the economic analysis in the Elko RMP/EIS is of sufficient detail to show significant impacts to the human environment and to assist in a reasoned choice between alternatives.

Firm and specific data on project costs and benefits will not be available until such time as project design and engineering considerations are finalized for activity plans. However, preliminary economic evaluations were used in the determination of selective management classifications of allotments, and incorporated in the selection of range improvement proposals under the various alternatives, as required by Bureau policy. Publication of these preliminary estimates, at this time, would be misleading because their accuracy is sufficient only to serve as a guide to the relative ordering of range improvement proposals.

Comment Letter 12

THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGION

7 November, 1985

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

Dear Mr. Harris:

The Wilderness Society appreciates the opportunity to comment on the Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the lands encompassing the Elko Planning Area.

The Wilderness Society is a major national conservation organization devoting resources to the preservation and wise management of our nation's public lands. Our current national membership of 145,000 individuals includes 500 members who call Nevada their home state.

We strongly object to the selection of Alternative D as the Preferred Alternative. In it's current form, the Preferred Alternative would designate only 1 percent of the entire planning area as wilderness, open 98 percent of the planning area to Off Road Vehicle (ORV) use, and 82 percent to unrestricted minerals development. Furthermore, management direction proposed in the RMP for wildlife and riparian habitat is skewed in favor of increased grazing and mineral exploration/development.

Following is a section by section discussion of our criticisms of the selection of Alternative D as the Preferred Alternative.

1791-A PINE STREET, SAN FRANCISCO, CALIFORNIA 94109
(415) 771-2020

Comment Letter 12

Inadequate Wilderness Recommendations

Rough Hills

The BLM is to be complimented for the recommendation to designate the entire Rough Hill WSA as wilderness. The area offers outstanding opportunity for solitude or primitive and unconfined recreation. The area is key mule deer (Odocoileus hemionus) summer range, and is populated by a variety of upland game birds; blue grouse (Dendropagus), ruffed grouse (Bonasa), chukar (Alectoris), and sage grouse (Centrocercus). Riparian habitats along the Bruneau River and Copper Creek sustain furbearers such as marten (Martes), beaver (Castor), river otter (Lutra), and muskrat (Ondatra). These and many other wildland dependent resources in the area would be protected through wilderness designation. We support the BLM's recommendation for Rough Hills.

On the other hand, The Wilderness Society disagrees with the BLM's wilderness recommendations for the other study areas addressed in the Draft RMP. It appears that the BLM has decided against proposing an area for wilderness when any possibility for resource conflict exists.

Little Humboldt River

Of 42,213 acres studied, the BLM is recommending 29,775 acres for wilderness and 12,438 acres for non-wilderness. Acreage in the north and northwest should be included in the proposed wilderness to protect additional year round deer range. This acreage is unfavorable for minerals, and should be included to provide a more natural boundary for the area.

Cedar Ridge and Red Spring

Both the 10,009 acre Cedar Ridge WSA and the 7,847 acre Red Spring WSA are well timbered, provide valuable year round deer range, offer important winter cover for sage grouse, and are important to migrating raptors including the bald eagle (Leucocephalus). No wilderness is recommended in either area, rather, both of the entire areas will be opened to intensive commodity development. ORV use, fuelwood cutting, minerals development, and oil and gas leasing are projected to seriously degrade the current condition of both areas.

In summary, the BLM is proposing wilderness designation for 36,460 acres, only 1 percent of the entire planning area. Conversely, 99 percent of the planning area would be open to developmental activities during all or part of the year. The Wilderness Society disagrees with this management proposal, and requests further wilderness recommendations be considered.

Comment Letter 12

RESOURCE MANAGEMENT DIRECTION

The Wilderness Society has several very serious concerns regarding management directions proposed in the Preferred Alternative. Our greatest concern involves the effects of resource management activities on the diversity and status of wildlife populations.

Riparian/Aquatic Habitats

Our initial concern involves the Objectives for specific management issues arrayed in the "Alternatives" section. On page 2-18 in the Preferred Alternative, the Objective for Issue #7: Wildlife Habitat reads "Conserve and enhance terrestrial and aquatic wildlife habitat". Riparian habitats are glaringly absent from the objective.

12-1 Alternative's A, C and E all include riparian habitats for protective management, yet the Preferred Alternative does not.

Approximately 22,000 acres of riparian habitat occur within the Elko Resource Area (RA). About 6,000 of these acres are presently in poor or fair condition. Of 73 inventoried streams (585 miles) 66 percent are in poor condition and 27 percent are in fair condition, and only 7 percent are in good condition. More than 300 wildlife species are known to occur within the Resource Area, approximately 240 of which are directly dependent on riparian habitat or use it more than any other habitat (Draft RMP 3-9). The discussion on the value of riparian habitats goes on to state that the single most destructive force to riparian habitats is trampling by livestock. Additional supporting language for this can be found in the Draft RMP on page 3-11, "...in most cases, livestock grazing was primarily responsible for producing and maintaining deteriorated aquatic/riparian habitat conditions". Despite this, the Preferred Alternative proposes to increase grazing opportunities by 30 percent, limit livestock fencing, and exclude mitigation language for road construction.

12-2

Clearly the effects of these practices would be to further degrade the already fair to poor conditions of riparian habitats and severely impact wildlife. The Wilderness Society urges the assurance of protection for riparian habitats in the final recommendation.

Mineral Restrictions

The Draft RMP does propose seasonal restrictions on mineral-leasing activities to protect wildlife species during sensitive times of the year. The Preferred Alternative proposes seasonal restrictions to protect sage grouse brood rearing grounds, and pronghorn (Antilocapra) year round range, however limits restrictions on mule deer range to winter range.

Response Letter 12

12-1 Refer to Chapter 3, Revisions and Errata. The reference to riparian habitat was inadvertently excluded under Alternative D.

12-2 The Proposed Alternative provides for only a three percent increase in grazing use above active preference. This use would not occur as across the board increases in each allotment. With the establishment of riparian objectives on page 2-19 of the Draft RMP/EIS and the incorporation of the specific riparian program guidance found on page 2-33 plus the mix of proposed actions as identified in Chapter 2 and 4, it has been determined that the combination of uses and levels of use are compatible and consistent with the Bureau's charge to manage for multiple use as defined under Section 103(c) of the Federal Land Policy and Management Act.

Also under the proposed alternative we hardly propose to limit livestock fencing. Even though it is true there are fewer (258 miles) miles of fence compared to Alternative B (405 miles), these 258 miles of livestock fences will enable the Bureau to implement intensified grazing systems. When the above is taken in combination with the riparian objectives to manage 117 miles of high priority stream habitat, with a 30 percent improvement in habitat condition predicted within the short-term, plus the adoption of the specific riparian program guidance, impacts to riparian should be mitigated and will improve as predicted under the proposed alternative.

Road construction, relocation and the mitigation of mining and mineral exploration activities, which often include road building, are specifically addressed and are part of the proposed alternative.

See specific resource and program guidance on pages 2-33 through 2-35 of the Draft RMP (Numbers 7-1, 7-2 and 14).

Comment Letter 12

12-3 We must admit to some confusion regarding the potential impacts of No Surface Occupancy (NSO) requirements on mineral exploration. On page 4-33, in the Preferred Alternative, the RMP states that NSO requirements are the same as in Alternative C, the "all wilderness" alternative. In the Preferred Alternative the impacts associated with these NSO requirements and seasonal restrictions are predicted to be "adverse, but not significant", yet on page 4-26 the RMP states that NSO requirements in Alternative C (identical to those in Alternative D) would have an "adverse" impact.

QUESTIONS/SUGGESTIONS

In conclusion, The Wilderness Society has the following questions and suggestions to be considered in the development of a Final Resource Management Plan.

1.) Expand wilderness recommendations to include lands valuable to wildlife and recreation in Little Humboldt River, Cedar Ridge, and Red Spring.

2.) Include riparian habitat protection in management issue objectives for wildlife habitat.

3.) Improve NSO language by including firm language regarding the requirement of NSO stipulations. example: replace "may require" with "will require"

12-4 4.) Are there differences between the NSO requirements of Alternative C and D?

5.) Clarify the contradiction in projected impacts of NSO and seasonal requirements on minerals development as discussed above.

Thank you for the opportunity to comment on the Draft Elko Resource Area Resouce Management Plan and Environmental Impact Statement.

Sincerely,

Patricia Hedge

Patricia L. Hedge
Regional Director: California-Nevada

Response Letter 12

12-3 The impacts are the same under both alternatives. Please refer to Chapter Three, Revisions and Errata for modification of page 4-26 of the Draft RMP/EIS.

12-4 Page 2-14 of the Draft RMP/EIS, Short and Long-Term Management Action No. 3 for Wildlife Habitat states that restrictions on leasable and/or salable mineral activities will be applied to all deer winter range. On Page 2-19, No. 5 for wildlife habitat states that these restrictions will apply to crucial deer winter range. These restrictions may include no surface occupancy as described in Appendix 6 of the Draft RMP/EIS. The remaining no surface occupancy restrictions are the same.

Comment Letter 13

Nevada Grazing Board of District #1
Post Office Box 52
Elko, Nevada 89801
(702) 738-5716

November 11, 1985

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

Dear Mr. Harris:

Enclosed are our comments on the draft Elko Resource Area Resource Management Plan and Environmental Impact Statement.

Please consider these comments thoroughly when you are preparing the final alternative.

Sincerely,

Roy Young, Chairman

RY/sa
Enclosure

Comment Letter 13

NEVADA GRAZING BOARD OF DISTRICT #-1
COMMENTS ON WELLS RESOURCE AREA DRAFT RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT
by Lester A. McKenzie

GENERAL COMMENT

This plan appears to be vastly improved. when compared to the document BLM prepared for their Wells Resource Area.

The preparers of this document did use some questionable procedures to develope and analyze the basic data used in the formulation of the various alternatives. The publication of this data is misleading and should be modified or a statement describing it's inaccuracies should be prominently displayed in the final report.

No unwarranted adverse effect on permittees should occur if BLM continues to follow the policy requiring livestock use adjustments to be based upon information developed through a realistic and effective monitoring program.

Page 4-1. Introduction (Environmental Consequences)
1st sentence- 'This section presents the scientific and analytic basis for comparison of the alternatives and selection of the resource management plan.'

Page 4-2. Assumptions for Analysis
Assumption 3- 'Baseline data for vegetation condition and trend and. other parameters is the best available .....'

13-1 The data on condition and trend may be the 'best available' but it is NOT adequate for comparing alternatives on a 'scientific and analytic' basis as stated on page 4-1. The discussion in the next three sections of this report are intended to support this statement.

CONDITION AND TREND SURVEY AND ANALYSIS

The greatest problem with the approach used to obtain range condition and trend data used in this RMP/EIS was that the team conducting the survey could not possibly evaluate all of the allotments in the Resource Area with the manpower and time available. To meet the deadlines, compromises were made on two very important points:

(1) Only the 'I' category allotments were examined in the field.

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Condition and trend on 'M' and 'C' allotments were estimated in the office; and

13-2 (2) field work on the 'I' allotments was limited to occasional write-ups of vegetative condition and trend on the major sites included in the mapping unit descriptions for the area being surveyed. The resulting estimates were then extrapolated to a much larger area, usually including all of the particular mapping unit delineation in which the write-up was made, sometimes including the same range site found in another mapping unit or delineation, and sometimes to an area many miles from the original write-up. Apparently no attempt was made to delineate varying ecologic status within the boundaries of a range site or mapping unit, even though significant differences do occur within relatively short distances from some of the write-up locations.

The result of these compromises is a very unreliable set of data for those allotments where the survey was conducted and potentially worse than unreliable where condition and trend were estimated.

On the 'I' allotments, apparent trend was determined more or less in accordance with the guidelines contained in the Nevada Rangeland Monitoring Handbook. On the 'C' and 'M' allotments, apparent trend was estimated in the office by the same folks who estimated the ecologic status.

The determination of apparent trend requires several subjective judgements to be made. Most of the people assigned to range survey parties do not have the experience necessary to allow them to make these judgements. Apparent trend is a one-point-in-time observation, the accuracy of which depends on weather conditions, current year's use or non-use by livestock and/or wildlife, insect infestations, personal bias, and other factors. Even when highly experienced people make the determination in the field, the information provided is unreliable and is nearly useless in a decision making process or in an analysis of alternatives. The trend guesstimates on 'M' and 'C' category allotments are further flawed by being made in the office.

The next step in the analysis of the range survey data was the prediction of the acreages of various seral stages that would eventually result from the application of each of the five
13-3 alternatives on each allotment. This was another guessing game because there is absolutely NO documentation available to show what changes in ecological condition can be expected on the range

Response Letter 13

13-1 The data presented was developed in accordance with recognized methods and processes. The estimates of ecological status and trend were presented for comparison purposes. Any decisions to modify stocking levels will be based on the procedures described on page 2-31 of the Draft RMP/EIS. As new information is obtained,it will be incorporated into the base data that will be used to make site specific decisions. This is supported by a recent U.S. District Court decision (NRDC et al. vs. Hodel), wherein the judge stated "Although the BLM will have to use site-specific data in adjusting livestock levels... it does not necessarily follow that such data must be analyzed in the EIS, in precisely the same detail."

13-2 The inventory procedures, as described in the Methodology Section, Appendix 5, as previously described to you, were followed. Also see Assumptions for Analysis, page 4-2, Assumption 3 of the Draft RMP/EIS.

13-3 Refer to the section "Methodology for Predicting Shifts in Seral Stage Acreages by Alternative", page A-47 of the Draft RMP/EIS.

Comment Letter 13

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13-3 sites in Elko County, Nevada as a result of applying alternatives 'B', 'C', 'D' or 'E' as described in this document. If realistic, measured trend data had been available, reasonable projections might have been made for alternative 'A', but even this is doubtful because of the artificial constraints applied in the plan.

The next step was the conversion of the range condition information to carrying capacities so the AUMs available under each alternative could be predicted. SCS ecological site guides contain estimates of the total potential annual air-dry production of each range site for favorable and unfavorable years. On sites where production is primarily made up of palatable species, a reasonable estimate of AUMs/acre can be made using these guidelines. The numbers get really wild when a high percentage of the vegetation is species with a low palatability, because of the adjustments applied in an effort to account for differences in palatability and useability.

The combination of unreliable data, analyzed by untested procedures, using arbitrarily selected factors and ignoring some obvious considerations is bound to result in questionable answers.

An example, using data from this document:
Map reference number 4 is a 'C' category allotment. The estimators said 3,423 acres of the BLM land are in 'late seral' ecological status and 1,501 acres are miscellaneous. The estimators also said the trend is downward.

When the predicters got done running this through the various formulas and applying factors for alternative 'D', they predicted that monitoring will show the need for an 80% cut in AUMs. They also predicted that without any treatment, other than the reduction in use, the long-term result will be to improve 150 acres to the potential native vegetation ecologic status.

A look at the allotments map in the plan shows the 4,924 acres of BLM land to be about 5% of the total area within the boundaries of this allotment. A look at the alternative 'D' land tenure adjustment map shows the BLM land within this allotment would be designated for disposal, indicating that no special values have been identified for these lands.

13-4 Several questions need answering here:
(1) How on earth did they find the 4,924 acres of BLM land in this large field so they could determine the ecological condition

Response Letter 13

13-4 The procedures used definitely recognized the differences between public and private land. The precise nature of the data in acreages was inherent in the mathematical procedure employed. See "Methodology for Estimating Current Ecological Status and Apparent Trend for the Elko Planning Area" (see paragraph heading, "M and C Allotments") in Appendix 5 of the Draft RMP/EIS, page A-46.

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so precisely? Remember, this was done in the office.

13-5 (2) What evidence indicates a downward trend of such a magnitude as to require an 86% cut, when this area has been used in the present manner for many years and still has the kinds of plants required to place it in late seral ecological status?

(3) How could the proposed cut be applied on an allotment where such a preponderence of land is privately owned?

I could cite other examples of questionable answers obtained by this procedure, but will refrain from doing so in the interest of your time and mine.

WILDLIFE HABITAT CONDITION

All wildlife habitat condition surveys (whether they are conducted on big game upland habitats, riparian habitats connected with streams, non-aquatic riparian habitats, or fish habitats) rate conditions found on the ground using a numerical score which relates to an optimum or ideal habitat for a species or group of species. No thought or consideration is given to the ability of the area being studied to provide the desired kind and amount of cover or the desired kind and amount of food or the desired ratio of pools to riffles or any of the other desired habitat components. All the survey does is assign a numeric value for the component, which is added to the values for the other components involved to arrive at a total score which says the condition is good, fair or poor. This method probably does a good job of rating man's concept of how good a particular habitat is for use by wild animals or fish. It DOES NOT provide the information needed to establish realistic goals or objectives for a Resource Management Plan or for a Habitat Management Plan.

--Page 3-6, Wildlife Habitat
The second paragraph, 2nd sentence, quotes Mike Wickersham of the Elko NDOW office as stating that the 20 year trend for habitat and population of both deer and antelope was downward.

Bob McQuivey, Habitat Section Chief in the NDOW state office, told me that he believed the reason the habitat trend was downward was because better range management practices are changing the vegetation on deer habitats back to grass dominated plant communities from shrub dominated plant communities which

Response Letter 13

13-5 The methodology used to determine the projected stocking rate (as described in Appendix 5 of the Draft RMP/EIS) for this allotment coupled with the Bureau's commitment to meet the reasonable number demands for big game suggested the proposed stocking rate. The percent reduction has been recalculated as a result of clarification of reasonable number data presented by NDOW for some allotments within three big game use areas. See Chapter 3, Revisions and Errata for the amended projections.

Since Fenced Federal Range is inherently a situation where public land is a small proportion of the total allotment, management is limited. Any change in stocking levels will be based on monitoring data as described on page 2-31 of the Draft RMP/EIS.

Comment Letter 13

were created by destructive grazing around the turn of the century.

An article by B.C. Staats, published in the October 9, 1985 Elko Independent, quotes Wickersham as reporting a considerable number of deer tags still being available. The article goes on to quote George Tsukamoto, NDOW's chief of game, as stating the statewide deer population has experienced a 20% increase this year.

These quotations lead one to believe that no one is exactly sure what the trend in deer numbers and habitat conditions is, and that any trend may not be primarily due to excessive livestock grazing, as various passages in this document would lead us to believe.

--Page 3-11, Aquatic Habitat
The 3rd par., 1st sentence lists the factors believed to be responsible for existing aquatic habitat conditions. Geologic events, other acts of God, and wildlife should be considered among the causes of 'deteriorated' conditions. The examples given us by the destructive runoff on the Ruby Mountains a few years ago seem to have been forgotten already as have the riparian areas and other wildlife habitats that were utterly destroyed by the extensive fires of 1984. Some of these events may have so altered the sites as to preclude any improvement, regardless of what management changes are made.

3rd par., 2nd sentence- It was somehow determined that livestock grazing was primarily responsible for producing deteriorated conditions. If the third sentence in this paragraph is supposed to be support for this theory, there must be an assumption that all 73 streams are identical to Gance Creek and the streams studied by Bill Platts. I think Platts will agree that no two streams are exactly alike and that, while livestock grazing may contribute to the condition of the habitat on a particular stream, you cannot make a flat statement that livestock grazing is always primarily responsible for deteriorated conditions. Grazing can in no way be blamed for two of the five 'priority A' limiting factors discussed in the 4th paragraph on page 3-10.

3rd par., 6th sentence- Most flooding in this area results from rapid snow melt on frozen or saturated ground, from rainfall and/or unseasonably warm weather with a heavy wet snowpack, or from convection storms. Soil compaction on riparian areas has a very insignificant effect on flood flows primarily because of the

Comment Letter 13

N-1 GRAZING BOARD Comments on draft Elko R.A. RMP/EIS Page 6

small portion of the watershed they encompass.

3rd par., 10th sentence- Gullying, and the resultant lowering of the watertable can be caused by such things as fire, geologic activity, beaver dams failing, severe convection storms etc.

13-6 --Page 4-31, Wildlife Habitat
2nd par., 1st sentence- What is the basis for projecting a blanket one condition class improvement? Is there scientific information available to show that all wildlife habitat in the area (which is shown on page 3-8 to be 90% of the area) is capable of supporting the attributes of one class better condition?

WILDLIFE NUMBERS

Estimated existing and so-called 'reasonable' numbers for deer, antelope and big-horn sheep were provided by the Nevada Department of Wildlife in a publication titled 'Input into Land Management Agencies Planning Systems-Elko Resource Area'. The NDOW document projects 'reasonable' numbers approximately double the existing numbers of deer and antelope and proposes to introduce 142 head of big-horn sheep into the resource area. According to BLM's Elko district wildlife biologist, Mr. Spang has signed an agreement with NDOW, promising to provide sufficient habitat to support the estimated 'reasonable' numbers of big-game.

13-7 Table 1 of appendix 4 of the RMP/EIS shows the wildlife AUMs assigned by BLM to each allotment. The footnote on page A-40 states: 'Reasonable and existing numbers by allotment are mathematical calculations based on the percent of big game use areas occurrence within each allotment. ....'. The resource area wildlife conservationist told me the numbers in the table have been adjusted to account for the acreage of privately owned land in the allotments.

Comparing the numbers NDOW provided for deer habitat areas with the numbers contained in the table, I am unable to reconcile the mathematics used by BLM to assign AUMs to allotments:

Map reference number 1, shows 13% of habitat area (use area) DY-1 to be in the Owyhee allotment and that 1,277 AUMs are needed to meet the 'reasonable' number demand. NDOW's numbers for habitat area DY-2 are 1,740 AUMs during the period from 3/16 to 11/15 and

Response Letter 13

13-6 This projection was made for big game habitat only. Projecting an improvement in condition is based upon professional judgement and the anticipated beneficial impacts resulting from intensified grazing management practices. This will be accomplished through the development of AMPs, HMPs, grazing systems and range and wildlife habitat improvement projects.

13-7 While it is recognized a significant dietary overlap exists between bighorn sheep and domestic livestock and, to a lesser degree, with mule deer and antelope, estimates of proper use factors would have had to have been developed and used in the calculations. Since the document estimations are not allocations of forage, these calculations were provided to illustrate relative impacts. The Bureau is committed to the objective to realize reasonable members as determined through monitoring.

Prior to receiving comments on the draft plan and while in the process of reviewing the calculations and figures for Table 1 Appendix 4, an error was identified in the reasonable number calculations for some allotments within three big game use areas (See Revisions and Errata, Chapter 3). However, we could not replicate your calculations. All management objectives for reasonable numbers relate to public lands only. It is recognized that private lands contribute to sustaining big game populations.

Uniform distribution within big game use areas of big game populations was a requirement within the selected methodology to determine both existing nad reasonable numbers by allotment as stated on page A-40 of the Draft RMP/EIS.

Because of the large amount of acreage and the variety of habitats involved within the RMP, the premise of uniform distribution of big game had to be utilized for analysis purposes.

No site specific studies are available that would provide any information on "actual densities" of big game by identified use areas or by allotment.

It was for this reason that the assumption found on page A-40, of the Draft RMP/EIS was used. Also see your observation page 6, paragraph 4, line 3.

Comment Letter 13

2,267 AUMs during the period from 11/16 to 3/15. This is a total of 4.007 AUMs estimated as needed for NDOW's 'reasonable' number of deer in habitat area DY-2. My TI-35 calculator tells me that 13% of 4.007 is 521, not 1.277.

The TI-35 also tells me that the 7% of DY-2 shown for the YP allotment should be 280, not 645.

The total of all the 'reasonable' number AUMs shown in table 1 for area DY-2 is 6.149 instead of 4.007 as listed in the NDOW document. A similar check of the DY-1 area. contained within the allotments in NDOW management area 6. shows a total of 5.728 AUMs allocated to deer by BLM as compared to a need for 2.104 AUMs shown by the NDOW document. There are an additional 5,185 AUMs allocated on the allotments containing DY-1 in NDOW management area 7. The NDOW document does not show a habitat area DY-1 in management area 7. but it is on the map and Duane Erickson told me that a supplement does list 1,200 AUMs for this habitat area.

Map reference number 4. the Indian Creek FFR allotment, is shown as having 3% of DY-2 and an allocation of 285 AUMs for deer was made. Again, the TI-35 shows a total of 120 AUMs would be a more appropriate allocation. However. the area shown on the map as being included in this allotment is approximately 95% privately owned and contains a large acreage of fenced irrigated land. With the exception of some small corners along the west side of the allotment. it appears that the BLM administered land is all within area DW-2, rather than DY-2. An adjustment in allocation to account for private ownership would eliminate any allocation of AUMs for deer in the habitat area DY-2 portion of this allotment.

NDOW reports a total of 3,000 AUMs needed for the 'reasonable' number of deer in habitat area DW-2 of management area 6. BLM estimates the Indian Creek allotment to contain 3% of this area and allocates 225 AUMs for deer. My arithemetic says the allocation should be 90 AUMs. reduced by the 90%.See exhibit #1 for an in depth look at the allocation on the first ten allotments on table 1.

If forage is to be allocated to 'reasonable' numbers of wildlife, it is important that the computations made to determine the forage needs of wildlife be as accurate as possible. The method used to make this determination in this RMP/EIS has four serious faults: (1) It assumes that wildlife and livestock have identical dietary requirements; (2) It assumes that wildlife utilize

Response Letter 13

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N-1 GRAZING BOARD Comments on draft Elko R.A. RMP/EIS Page 8

habitat areas uniformly, regardless of habitat quality: (3) It does not adequately recognize deer use on privately owned lands: and (4) Even if the other three points were not arbitrary, the mathematics are erroneous.

LIVESTOCK NUMBERS

--Page S-5, Summary Table 1:
--Page 2-18, Grazing Action #5
--Page 4-30, Livestock Grazing, 1st par.

13-8 BLM needs to more strongly emphasize that the 3 to 5 year average is for EIS purposes only and that livestock may use up to the active preference AUMs on all allotments until monitoring indicates a need (or opportunity) for the adjustment of numbers or period of use.

USES AND DATA BY LAND OWNERSHIP

--Page 1-3, Table 1-1

13-9 The 35% private lands, the 9% USFS lands and the 4% other lands are added to the 52% BLM lands to make the 100% of land in the planning area. It therefore appears that statements made about the resources in the planning area or RMP area apply to all lands, not just BLM, unless otherwise specified.

--Page 3-3, Recreation, 6th par.

The first through fourth sentences state that 20% of the state's deer reside in the RMP area but that it is difficult to estimate the hunting use that occurs on BLM or USFS lands because of the mixed ownership between BLM and USFS. This would lead one to believe that all of the deer in this area live on publicly owned lands and that all hunting occurs there. This is NOT the case and it should be clarified that a substantial amount of deer habitat is found on private property and that a significant proportion of the hunting occurs on these lands.

The last sentence in this paragraph discusses access problems resulting from privately owned lands. The statement: 'and recreationists often unintentionally or intentionally tresspass on private property' should be added.

--Page 3-15, Minerals

It is unclear whether the statistics on production, disturbed lands etc. relate to just BLM land.

Response Letter 13

13-8 Please refer to page 4-2, Assumptions for Analysis 3 and 4; and on page A-46, first paragraph of the Draft RMP/EIS; and page 4-30, column 2, first paragraph. It is adequately stated in these places in the Draft RMP/EIS.

13-9 The proposals and analysis presented in this RMP apply only to public lands under BLM administration. See page S-1 of the Draft RMP/EIS.

Comment Letter 13

N-1 GRAZING BOARD Comments on draft Elko R.A. RMP/EIS Page 9

Page 3-17, Riparian Vegetation
1st par.. The 3rd sentence does not make it clear whether all 22,000 acres of riparian vegetation inventoried are on BLM land. **13-10**

--Page 3-21, Mining Industry
Lists personal income, tax revenues, and employment resulting from mining, and from geothermal and oil/gas leasing. It is unclear whether these numbers relate strictly to BLM lands or whether they include private and perhaps Forest lands? **13-11**

--Page 3-23, Recreation/Wilderness
1st par.. 2nd sentence-'Over 15 percent of the state's total for fishing, and about 25 percent of backpacking occurs within the RMP area.' It is unclear whether these recreational activities all occur on BLM lands, or whether the numbers include N.F. and private lands also. **13-12**

--Page A-2, Appendix 1, Table 1
I seriously doubt whether 33,500 person days of recreational horseback riding is done on BLM lands every year. This is an average of 92 people every day of the year or 186 people every day for a six month's period. The numbers in this table, if they reflect all ownerships, are highly misleading. If they are intended to reflect just BLM, they should be checked because the numbers for many activities are unrealistic. **13-13**

--Page 3-27, Cultural Resources
1st sentence- It is unclear whether all 1,600 known cultural sites are on BLM land. How was the 50,000 estimate obtained? **13-14**

PLANNING

Since this is a broad plan, why not say 121,000 acres of land treatment rather than 120,978; 260 miles of fence rather than 258; 41,000 AUMs rather then 40,782 etc. ? The exact numbers used indicate a degree of precision that does not exist in this document.

--Page 2-18, Grazing Action #4
--Page 4-30, Grazing, 2nd par., 1st sentence
The six category 'M' allotments needing AMPs should be placed in

Response Letter 13

13-10 See Response to Comment 13-9.

13-11 Personal income, tax revenues, and employment derived from the mining industry (page 3-21) relate to all lands within Elko County. See also Table 3-4, page 3-20 of the Draft RMP/EIS.

13-12 Refer to Response 13-9.

13-13 As stated on page 3-2, Table 1 of Appendix 1 refers to recreation uses of the public lands or those lands administered by the BLM, within the Elko RMP Area. As stated in Footnote Number 1, the estimates were derived from information in the Nevada Statewide Comprehensive Outdoor Recreation Plan, Elko District Recreation Visitation Files, and professional judgment. They represent the best information available and were used for analysis purposes.

13-14 The estimate of 50,000 sites was derived through a projection of area covered by known sites located on public lands proportionately expanded to the surface area of public lands within the planning area.

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N-1 GRAZING BOARD Comments on draft Elko R.A. RMP/EIS Page 10

category 'I' along with the category 'M' and 'C' allotments needing range improvement work.

--Page 2-24, Management Guidance
The 2nd sentence of the last paragraph on this page states that 'detailed, site specific management actions' are outlined in AMPs, HMP, WHMPs, wilderness plans etc.

The only draft HMP I have had the opportunity to review did not go into much detail and was not site-specific other than to suggest an unusual grazing system and a change in season of use for a portion of one allotment. Other actions were mentioned, but the wildlife conservationist said the HMP area was so large and had so many needed projects that he just didn't have time to get down to specifics.

Several draft AMPs contain the statement that wildlife enhancement practices will be done in accordance with the HMP discussed above. The draft HMP does not mention some of these practices and discusses others in a very general way, certainly not in enough detail to be used as a reference for location and specifications in an AMP.

Planning would be much more meaningful if plans for an allotment were developed within the framework of the RMP and included plans for livestock grazing, wildlife habitat management, feral horse management and other uses as appropriate all in the same package. Under the present procedure, I'm concerned about which comes first-the chicken or the egg--Obviously all the different kinds of plans will not be developed simultaneously, yet each should be and is supposed to be coordinated with the other. How can an AMP be coordinated with a HMP or a WHMP that won't be developed until 3 years later? 13-15

--Page 2-29, Allotment Management Plans
The statement in the first paragraph is excellent! It brings out that AMPs need not be mini-EISs. It gives hope that there might be some give and take between HMPs, WHMPs and AMPs, rather than having to make the AMP fit the other kinds of plans as seems to be the present rule of the game.

GRAZING AND WILDLIFE IMPROVEMENTS

--Page 2-18, Grazing Action #3, Wildlife Action #2
Water developments for livestock would benefit wildlife too. Will the wildlife water developments be designed for multiple use or strictly for wildlife? 13-16

Response Letter 13

13-15 The RMP provides overall objectives for the resources involved in these activity plans. Each activity plan will incorporate these as appropriate and therefore the sequence of the plans is not significant. Review and development of AMPs, HMPs, HMAPs, etc. requires coordination with all resource specialists.

13-16 All water developments, including wildlife developments, will provide for multiple uses, where possible, in compliance with existing policy and regulations.

Comment Letter 13

N-1 GRAZING BOARD Comments on draft Elko R.A. RMP/EIS Page 11

The 189 miles of wildlife fence appears to be in addition to the 258 miles of fence proposed under grazing. Poor antelope! Could these fences be coordinated to make them serve more than one purpose and thus reduce the total needed? **13-17**

--Page S-5. Summary Table 1
--Page 2-19. Wildlife Action #6
--Page 2-10. Aquatic Habitat
The plan does not specify how the riparian/stream habitats would be managed to bring about a 30% improvement in all of the selected 116 miles within a 5 year period. What techniques are planned and is this objective really reasonable for ALL 116 miles? **13-18**

--Page 2-30. Range Improvements
Par. c) states that sagebrush alterations will be IN ACCORDANCE WITH PROCEDURES SPECIFIED in the Western States Sage Grouse Guidelines. The response from Washington to the N-1 Grazing Board's protest to the Wells RMP/EIS stated that these guidelines would be USED AS GUIDELINES, not as specifications. **13-19**

MONITORING

--Page S-5. Summary Table #1
Page 2-18. Grazing Action #5.
How much change must occur and for how long a period before it is considered to be an upward or downward trend that warrants a change in preference? **13-20**

Will monitoring continue, after adjustments are made, to assure the adjustment was effective in meeting the objectives? **13-21**

--Page 2-18, Wildlife Action #3
This action should be rewritten to state that season-of-use adjustments or other management changes would be considered if monitoring indicates the need.

--Page 2-19, Horse Action #2
How will utilization and effects on vegetation due to horses be differentiated from grazing by livestock and wildlife? **13-22**

Response Letter 13

13-17 These plans will be closely coordinated wherever and whenever possible and every attempt will be made to ensure management objectives are being met with the least amount of fencing. Fencing on antelope ranges is also mitigated to reduce impacts. This is consistent with BLM Policy as outlined within BLM Handbook 1741-Fencing. See page 2-30 of the Draft RMP/EIS.

13-18 Specific management techniques to improve riparian/stream habitat will be addressed during the development of activity plans such as habitat, allotment and watershed management plans. Techniques may vary from area to area and will most likely include, but would not be limited to, the specific program guidance as found on page 2-33 of the Draft EIS/RMP.

The 30 percent improvement on all 117 miles is a reasonable objective. Existing riparian studies within the district have shown that this type of a response can be expected within the short-term.

13-19 The specific resource or program guidance found on page 2-30 of the Draft EIS/RMP which addresses the alteration of sagebrush, was included as "specific guidance". The Western States Sage Grouse Guidelines, recommends how and what should be done when land managers consider altering sagebrush within sage grouse habitat. These procedures were intended for use as guidelines.

13-20 See Chapter 3, Revisions and Errata under "Glossary" for clarification of the definition of trend. The amount and duration of change before action is taken depends directly upon site specific conditions and the attainment or non-attainment of allotment specific objectives.

Refer to Page 2-31 of the Draft RMP/EIS on Livestock Use Adjustments.

13-21 Monitoring will continue to measure attainment of objectives.

13-22 The results of monitoring studies will be used on a site specific basis to evaluate utilization and effects on vegetation. Where possible and necessary utilization will be read prior to grazing by livestock and after grazing by livestock to determine the portion of the forage utilization which is attributable solely to use by wild horses. See page 2-31 of the Draft RMP/EIS for further information.

Comment Letter 13

N-1 GRAZING BOARD Comments on draft Elko R.A. RMP/EIS Page 12

--Page 2-31. Monitoring Program
The 3rd sentence of the 3rd paragraph should refer to the 1984 edition of the Nevada Rangeland Monitoring Handbook. 13-23

--Page 2-32. Use Mapping
The 1st paragraph partially explains the importance of use mapping but does not go far enough. Use pattern mapping is the most effective tool available for range managers to use in planning, locating monitoring sites, and determining whether or not the plan is working. Use pattern mapping must not be done just because someone says to map use patterns, it must be done because the range manager wants and will use the information it provides. To obtain maximum benefit for all parties, the permittee should actively participate in use mapping.

OTHER ALTERNATIVES

--Page 2-23. Long-term Horse Actions #1 and #2
It appears unnecessary to gather horses and restrict horse numbers under the no-grazing alternative. It would be more useful to analyze the effect of uncontrolled horse populations than it was to analyze the effect of no livestock grazing.

Page 4-2. Assumptions for Analysis
Assumption no. 4- Monitoring of vegetative use is a requirement of BLM policy and therefore is NOT a variable that can be omitted from all alternatives except the preferred alternative. Omitting this important management activity biases the analysis in favor of the alternative that was obviously selected even before the analysis began! 13-24

--Page 4-8. Livestock Grazing (Alternative A)
Second sentence- 'However, particular allotments may experience gains or losses as a result of changes in forage condition and trend, over time.' If monitoring is not a part of alternative A, how would changes and trends be detected? 13-25

MISCELLANEOUS

--Page 2-27. Legal Access
The 3rd sentence reads: 'Easements required to provide access to public lands will be acquired ....' Does this language indicate 13-26

Response Letter 13

13-23 This reference has been changed. See Revisions and Errata, Chapter 3.

13-24 The assumption to incorporate monitoring into the preferred alternative only was based on the requirement by the National Environmental Policy Act to present an array of alternatives. If monitoring were included as a part of each alternative analyzed than the stocking levels would be similar and only short term impacts would be analyzed.

13-25 This discussion refers to economic gains or losses, not vegetation.

13-26 Even though the right of Eminent Domain through condemnation is a method that can be used to obtain access, it is anticipated that this method will not be used for resource management purposes. The preferred method to obtain access is through negotiation.

Comment Letter 13

do not truly reflect or even acknowledge the wildlife use on private lands. The recreational uses, forage production, wildlife habitat and other values of the intermingled private lands are substantial and are inseperable from those on BLM administered lands. The existence of these values should be acknowledged in the plan because they do have a effect on how the adjacent federal land is managed.

Respectfully submitted,

Lester A. McKenzie
Certified Range Management Consultant

Comment Letter 13

Exhibit #1

CALCULATION OF DEER AUMS FOR TEN ALLOTMENTS
NDOW Wildlife Habitat Areas DY-2 and DW-2

Map Ref. No. (RMP)	Deer Use Area (RMP)	Acres of Use Area in Allot (1)	% of Use Area in Allot (2)	Est. AUMs (3)	% BLM (4)	AUMs on BLM (5)	Apprvd. Table # 1 (RMP)
1	DY-2	177,280	14.3	573	98	562	1,277
2	DY-2	97,280	7.8	313	98	306	645
3	DY-2	12,800	1.0	40	80	32	90
4	DY-2	32,640	2.6	104	5	5	285
	DW-2	72,960	41.6	1,248	5	62	225
5	DY-2	14,080	1.1	44	38	17	41
	DW-2	1,920	1.1	33	38	13	11
6	DY-2	10,880	0.9	36	68	25	89
7	DY-2	15,360	1.2	48	77	37	75
	DW-2	5,120	2.9	87	77	67	39
8	DY-2	2,560	0.2	8	89	7	88
	DW-2	16,640	9.5	285	89	254	18
9	DW-2	4,480	2.6	78	53	41	75
10	DW-2	4,480	2.6	78	49	38	38

(1) All acreages estimated from BLM 30 minute maps with allotment and deer use area boundaries plotted as closely as possible.

(2) Percent of use area estimated by dividing acres of use area on allotment by total acres of use area.

(3) Use area AUMs estimated by multiplying NDOW reasonable AUM total for each use area by the percent of the use area estimated to be within the allotment.

(4) % BLM determined by dividing BLM acres (appendix 3, table 1) by the total estimated area of the allotment.

(5) AUMs on BLM determined by multiplying the estimated AUMs for the use area in the allotment by the percent BLM land in the allotment.

Comment Letter 14

November 13, 1985

Mr. Rodney Harris
District Manager
3900 East Idaho Street
Elko, Nevada 89801

Dear Sir:

In reviewing the draft Elko Resource Area RMP & EIS, it is difficult for me to be convinced that the review team could have accurately evaluated all the allotments in the Elko area within the time frame and manpower that were available. I assume that many of the allotments were evaluated in the office only and this procedure can be only a "guessing game" at the best.

Under Alternative D, Land Tenure Adjustments and Corridors, the Willis Packer Ranch's Boulder Field Allotment located on the county lines of Elko, Lander, and Eureka-T37N and T36N, R49E, R48E, and R47E-the suggested areas of exchange on the map does not include this area. Some thirty years ago, Willis Packer fenced approximately 10,000 acres involving alternate sections of BLM and private land with a verbal agreement with the BLM that private land outside the fenced area, approximately 5000 acres, would eventually be

Comment Letter 14

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Comment Letter 14

exchanged with BLM and thereby this Boulder Field would be a private field.

We would like to suggest that this area could be extended to a possible exchange proposal in the near future. 14-1

Thank you for your consideration on this matter.

Sincerely,

Dean A. Rhoads

Dean A. Rhoads

Response Letter 14

14-1 Refer to the Land Tenure Adjustment Map for the Proposed Plan within Chapter 2 of this document. It appears your lands are within areas available for exchange. The small portion of T. 36 N., R. 49 E., you refer to within the speckled area of Transfer Primarily by Exchange area, is an area where the Bureau wishes to decrease public land holdings. The remaining area to the north, is an area the Bureau wishes to retain as public lands. See Chapter 3, Revisions and Errata, for further explanation of land tenure adjustment categories.

Comment Letter 14

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Comment Letter 15

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
WGS-Mail Stop 423
DES 85-37

Memorandum

To: District Manager, ATTN: RPM Team Leader, Elko District, Nevada

From: Assistant Director for Engineering Geology

Subject: Review of resource management plan and draft environmental statement for Elko Resource Area, Nevada

We have reviewed the statement as requested in a memorandum of August 7 from the State Director, Bureau of Land Management.

15-1 Since ground water is used for irrigation, the statement should evaluate the scope of such use and assess its effects on ground-water resources under the proposed management plan. Periodic monitoring of the quality of drinking water supplied to the public and staff should be discussed.

James F. Devine

Copy to: District Chief, WRD, Carson City
(information only)

Response Letter 15

15-1 Groundwater on the public lands is used for irrigation in conjunction with entries under the Desert Land Act. Before an entry is allowed, the State Engineer of Nevada investigates the groundwater situation for the hydrographic basin in question. Based upon the investigation, he determines how much water can be withdrawn for irrigation purposes. We adhere to these findings when determining the number of entries to be allowed.

The only drinking water supplied to the public is located at our campground facilities. These wells are monitored in accordance with State of Nevada regulations.

Comment Letter 16

WELLS RURAL ELECTRIC COMPANY

P.O. BOX 365 WELLS, NEVADA 89835 • CARLIN, NEVADA 89822 • WENDOVER, UTAH 84083

November 11, 1985

Bureau of Land Management
Elko District Office
P.O. Box 831
Elko, NV 89801

Attention: RMP Team Leader

Subject: Elko Resource Area RMP & EIS.

Wells Rural Electric Company would like to submit for your consideration the following comments in regard to the Draft Resource Management Plan and Environmental Impact Statement for the Elko Resource Area.

Our primary area of concern deals with the designation of future utility corridors. We have enclosed our Long Range Plan which covers future planning through the year 2002. In particular, we would like to call your attention to page 86 of this document which loosely defines potential corridors and facilities which might be necessary for service in the WREC service territory. We would like to encourage you to include these potential corridors for consideration in the final RMP and EIS. 16-1

Since this map includes areas outside the Elko Resource Area, the following is a list of those facilities specifically included in this area.

1) Carlin Substation to Carlin Gold Quarry Substation 120 KV Line. This facility has been constructed but does not appear as a corridor on the maps in the Draft.

2) Carlin Substation - Pine Valley Line - This facility has been approved for construction with all necessary permits and easements and construction has been started.

3) Eightmile Creek Switchstation (Elko Switchstation) to Jiggs Substation to Ruby Valley Substation - A portion of this line was addressed in the RMP although the actual routing is different. Relocation of this facility and inclusion of that portion over Harrison Pass to Ruby Valley should be considered.

"owned by those we serve"

Response Letter 16

16-1 The intent of the corridor issue in the RMP was to provide for transmission facilities (as opposed to distribution). None of the three powerlines identified by your company meet the criteria of transmission lines. In fact, the Pine Valley Line was approved with the assumption that future transmission facilities would not be acceptable along its route. A corridor must be able to accommodate more than one facility in its location.

Comment Letter 16

WREC understands the need for coordination with the BLM and appreciates this opportunity to submit some of our long range planning for consideration. In the future, as soon as planning documents are prepared, they will be submitted for your consideration.

If you have any questions or if we can be of assistance in your planning efforts, please do not hesitate to contact us.

Sincerely,

WELLS RURAL ELECTRIC CO.

Kenneth Schlecht
Engineering Supervisor

KS/ts
enclosure

Comment Letter 17

Jiggs Conservation District

[redacted]
RR RANCH, ELKO, NV.

Bureau of Land Management
Elko District Office
Attn: RMP Team Leader
P.O. Box 831
Elko, NV. 89801

Dear Sirs:

After review of the draft Elko Resource Area Environmental Impact Statement, The Jiggs Conservation District submits the following comments and requests that these comments be made a part of the official record.

17-1

1. Projected adjustment to AUMs based on ecological condition survey.
   A. On I allotments there is a question as to whether or not survey techniques were accurate enough to provide an adequate estimate of trend and condition.
   B. Projection of changes in condition due to implementation of alternatives does not appear to be scientifically sound.
   C. ~~Conservation~~ of condition to carrying capacity is not based on adequate data.
   D. Estimated condition and trend in M and C allotments is not accurate because condition was estimated from the office rather than making actual on-the-ground surveys.

17-2

2. Projected adjustments to AUMs based on forage demanded by "reasonable numbers" of big game.
   A. Doubling of deer numbers is not a realistic goal for big game number increase. Perhaps a one-third to one-half increase would be more realistic.
   B. Assignment of deer AUMs to the allotments based on proportion of big game use area within an allotment is not realistic. Based on location, habitat, etc... some allotments have little deer use while other allotments have substantial deer use. To prorate deer use according to what percentage an allotment is of the total resource area is unrealistic.
   C. It appears insufficient consideration is given to the contribution of privately owned lands in a habitat area. Privately owned lands contribute substantially to deer AUMs.

3. Projected downward adjustments have the potential for an adverse effect on the borrowing ability of a ranch with financial lending institutions.

In fairness, we realize the short time frame imposed on the Elko BLM District to complete the Elko RA EIS was unrealistic and lacked adequate time to gather the actual and factual data needed to come up with correct and sound decisions for some of the above mentioned items.

CONSERVATION · DEVELOPMENT · SELF-GOVERNMENT

Response Letter 17

17-1 The presentation of data projections based on the best available data is in compliance with the Council on Environmental Quality Regulations (40 Code of Federal Regulations 1500). BLM policy requires that vegetation monitoring be implemented to provide reliable data from which livestock forage adjustments are made. Please refer to the section entitled "Livestock Use Adjustments" on page 2-31 of the Draft RMP/EIS for further information.

17-2 The BLM, within the proposed plan, has commited to attainment of reasonable numbers in compliance with State Director Policy. Reasonable numbers are defined on page G-5 in the Draft RMP/EIS and are based on long-term averages of known population levels by management area. Numbers were provided by the Nevada Department of Wildlife.

Because of the large amount of acreage and the variety of habitats involved with the RMP, the premise of uniform distribution of mule deer had to be utilized for analysis purposes. We recognize that some allotments have more preferred habitat than others and as a result have more deer use.

When we computed the reasonable number AUMs, the percent Federal range was used as part of our computations and therefore resulted in apportionment of AUMs for public land only. Furthermore, we acknowledge the important component that private lands contribute to the continued existence and improvement of the mule deer populations dependent upon those lands.

Comment Letter 17

Jiggs Conservation District 2

We are also of the opinion that land management by court order does not give the agency the best shot at good multiple use management of all the public rangelands.

Thank you for giving us the opportunity to comment. If the Jiggs Conservation District can be of assistance in future BLM resource management programs, please feel free to call on us. We will look forward to participating.

Sincerely,

John Vasquez
Chairman

CONSERVATION · DEVELOPMENT · SELF-GOVERNMENT

Comment Letter 18

[illegible]

Sincerely,

[illegible]

Comment Letter 19

Elko County Conservation Association
P. O. Box 2561
Elko, Nevada 89801
November 14, 1985

Mr. Rod Harris
District Manager
Bureau of Land Management
3900 East Idaho Street
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

Recently a number of Elko County residents who are vitally interested in natural resource conservation assembled to form the Elko County Conservation Association. We wish to work closely with the land management agencies, conservation groups, and industry in conserving, protecting and enhancing Nevada's natural resources. With this in mind, please accept our comments on the Draft Elko Resource Area Management Plan.

Introduction

After reviewing the Draft Elko RMP, our impression is that the general condition of the lands within the Elko RA are in either fair or poor condition. This indicates to us that significant problems exist in the Elko RA, and we feel that it is urgent that problems identified in the Draft RMP be rectified. The generally poor production of native plants and the deterioated condition of riparian areas are a chief concern.

Riparian

I. Riparian habitat is the heart of the native ecosystem in Nevada and its condition is generally indicative of the quality of land management practices. It is disturbing that of the nearly 600 miles of riparian habitat within the Elko RA, 66% is rated in poor, 27% in fair, and only 7% in good condition. Each alternative of the RMP

Comment Letter 19

Page 2
Riparian con't.

19-1 would result in a net decline of riparian habitat within the Elko RA, and each is unacceptable in that respect. We urge that the Elko BLM district adopt as its guideline the criteria outlined in the American Fisheries Paper--"The Best Management Practices for Management and Protection of Western Riparian Stream Ecosystems." Should the Bureau adopt any management plan that allows for a decline in or simple maintenance of current riparian habitat conditions, we would like a written explanation for the adoption of such a plan.

II Range Management

Livestock management practices should enhance overall range conditions for wildlife. That is, improvement of range conditions should be the goal of the Bureau for the mutual benefit of livestock and wildlife. However, no practice should be implemented that will have a detrimental effect on wildlife. We recommend that the Bureau adopt a vigorous program that would most enhance soil and water conservation within the Elko RA. Under such a program, livestock and wildlife will both benefit.

Specifically, the condition of all range land within the Elko RA should be stabilized and managed for improvement. Reseeding in burned areas should include the reintroduction of native species. Regular monitoring is a crucial part of the management program. We feel that such monitoring is necessary to an effective management plan.

III Wilderness

Both the Rough Hills and the Little Humboldt River WSA's should be given wilderness status. The Cedar Ridge and Red Springs WSA's should be dropped from wilderness consideration.

IV Land Exchanges

Land exchanges that will block up areas of wildlife habitat should be pursued. Public access corridors should be a part of any exchange.

Response Letter 19

19-1 The specific riparian resource and program guidance found on pages 2-26 through 2-35 (Numbers 2, 7-1, 7-2 and 10, 11 and 14) of the Draft RMP/EIS adequately address and are consistent with the American Fisheries Society's Best Management Practices. While these techniques are not all inclusive, they have proved to be effective in the management of streamside riparian habitat within the Elko District.

Comment Letter 19

Page 3

V Utility lines, pipe lines, etc. should closely follow existing corridors.

Questions and Concerns

19-2 Preferred Alternative D would result in deterioation of aspen stands (p.4-33). How is this compatible with the Bureau's responsibility to protect and enhance wildlife habitat and with executive orders 11933 and 11990 to protect riparian habitat (pp. 1-6 and 1-7)?

19-3 The Alternative E (p.4-37): The removal of livestock grazing will increase big game populations. Does this suggest that mule deer populations would benefit from a climax grass type? Don't studies indicate otherwise?

19-4 Shouldn't habitat improvements also consider the reintroduction of sharp-tailed grouse?

19-5 Wouldn't the abolishment of all livestock grazing (Alternative E) be detrimental to chuckar partridge habitat?

19-6 Grasshopper control has been an important and costly program. Grasshopper problems are largely a reflection of poor long-term management, yet this problem is not mentioned. Why?

19-7 Alternative E suggests that range fires would be a greater problem if cattle grazing were eliminated, but don't cheat grass ranges now pose the greatest fire danger?

Respectfully submitted,

Bob McGinty

Bob McGinty
Chairman
Elko County Conservation Association

Response Letter 19

19-2 Both E.O. 11990, Protection of Wetlands and E.O. 11988, Floodplain Management do not apply to the management and protection of aspen. However, we recognize our responsibility to manage these habitats. Under the concept of multiple-use, as specified in the Federal Land Policy and Management Act, the Bureau is responsible for various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. After considering public comments received throughout the planning process, the Proposed Plan is felt to best meet these needs. Emphasis will be placed on maintaining these areas while improving other riparian habitats of greater value. The Bureau is concerned that this valuable wildlife habitat be retained. The assessment under the proposed alternative is the best estimate of projected impacts.

19-3 The removal of livestock grazing will not significantly change existing range sites or plant communities within the life of this plan (20 years). This is documented in the discussion of vegetation impacts on page 4-38 as supported by various authors including French and Mitchell, 1983 and Rice and Westaby, 1978 (see references in Draft RMP/EIS). The response potential of most range sites is not capable of this. It is, however, anticipated under this alternative that plant density and diversity, will increase and that forage utilization by livestock, in areas of crucial big game habitat, would not occur on public lands. Therefore, all of the annual available forage would be reserved for big game consumption. In addition, competition would be reduced or eliminated.

19-4 Nevada Department of Wildlife's input into the planning system did not identify potential sharptailed grouse reintroduction sites or areas.

19-5 For the life of the plan (20 years), native plant succession or ecological status will not have a significant impact on the cheatgrass community nor the chukar populations dependent on them. This is supported in the impact analysis on page 4-38 of the Draft RMP/EIS (See response 19-3).

19-6 The rationale for not including the issue of grasshopper control in the Draft Elko RMP/EIS was twofold. First, this was not identified as an issue during the scoping process. Second, grasshopper control is not a Bureau initiated program and as such is coordinated by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS). Those treatments conducted by APHIS are on a case-by-case basis. USDA-APHIS has prepared and analyzed the impacts of this program with a nationwide programmatic EIS. Site specific environmental assessments are prepared to analyze individual situations.

19-7 Cheatgrass ranges do provide the light, flashy fuels which burn easily under the optimum conditions of fuel load, humidity and a source of ignition. Areas dominated by cheatgrass are likely sources for the spread of range fires. No projection was made on the spread of cheatgrass ranges to imply additional fire danger under Alternative E or any other alternative.

Comment Letter 20

STATE OF NEVADA

RICHARD H. BRYAN
Governor

JEAN FORD
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

November 14, 1985

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

Re: SAI NV #86300014 Project: Elko RMP/EIS

Dear Mr. Harris:

Enclosed is the Governor's position on the wilderness recommendations as presented in the Elko Draft Resource Management Plan and Environmental Impact Statement. Also attached are individual State agency comments. Agency comments on wilderness are provided on an informational basis and may not directly correspond to the Governor's position.

We would also like to express our appreciation to you and your staff for the briefing held for State agencies in October; we will be looking forward to reviewing the Final EIS when published.

Sincerely,

John B. Walker
Planning & Intergovernmental Affairs, NOCS/SPOC

JBW/ll
Enclosures
cc: Edward Spang, BLM

Comment Letter 20

STATE OF NEVADA

RICHARD H. BRYAN
Governor

JEAN FORD
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STATE OFFICE OF COMMUNITY SERVICES
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(702) 885-4420

November 14, 1985

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

Re: Governor's Position on Wilderness, Elko RMP/EIS

Dear Mr. Harris:

The State of Nevada acknowledges receipt of the draft Resource Management Plan and Environmental Impact Statement for the Elko Resource Area. Several State agencies will be commenting directly on different aspects of the document. This letter constitutes the official State position on the wilderness recommendations developed in the plan.

1. Red Spring and Cedar Ridge Wilderness Study Areas: The State concurs that these two relatively small wilderness areas should not be given further consideration for wilderness designation. Located very close to each other, only twenty miles from Elko, these areas do possess a certain scenic beauty. However, they are not unique, and opportunities for solitude and primitive recreation are not outstanding. Both areas contain conflicts with wilderness designation (mineral and wood product potential as well as a considerable range fire hazard) that outweigh the limited wilderness values.

2. Rough Hills Wilderness Study Area: This is an isolated area of very rugged terrain. It has excellent opportunities for solitude and primitive recreation. Although it is a small area, it has many scenic rock formations and canyon areas. Access is presently difficult and the area is not frequently visited. The State does have some concerns about the two private inholdings

Comment Letter 20

found in the area and also about the moderate mineral potential. We will be conducting additional research into these areas of concern. However, based on information available at the present time, the State concurs that the Rough Hills Wilderness Study Area appears suitable for wilderness designation.

3. The Little Humboldt River Wilderness Study Area: This area includes 42,000 acres of the canyon and drainage basin of the Little Humboldt River. The canyon itself is undeniably scenic and unique, and we concur that its high wilderness values outweigh other values. However, we have some concern about the inclusion in the wilderness area of so much of the rolling uplands above the canyon. We are concerned about the manageability of these uplands as wilderness. We also note the presence of private inholdings, several roads and ways, and some mineral potential, particularly for gold and barite. We would support a modified wilderness proposal in which the boundaries are drawn back closer to the canyon rim. We would be happy to work with you on specific boundary demarcations, but initially suggest that the top of Castle Ridge would be a preferable boundary on the northeast, and the boundary shown in Alternative B on the southwest.

The State appreciates the opportunity to comment on this document. We look forward to continuing to work with you in your wilderness reviews. Please do not hesitate to contact this office for any additional information you may need.

Sincerely,

Joan Ford

Joan Ford
Director

JF/11

Comment Letter 20

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

November 5, 1985

Mr. John B. Walker, Coordinator
State Clearinghouse
Office of Community Services
1100 E. William, Suite 109
Carson City, NV 89710

NOV 1985

RE: SAI NV #86300014

Dear John:

We appreciate the opportunity to review and comment on the Elko Resource Management Plan and Environmental Impact Statement and submit our comments and recommendations for your consideration in the final RMP/EIS.

In the Department's role to protect, maintain and enhance the state's wildlife resources, we must rely on the land management agency to provide the necessary quality and quantity of habitat to support that resource. Therefore, we see the present condition of that habitat and the proposed future conditions, as brought about by land management, to be key factors in our role of providing desirable populations of wildlife. It is often stated that good range management is good wildlife management and we certainly support that premise if the goal is applied to native range and the attainment of good or better ecological range condition. We believe that in many cases the RMP/EIS does document many resource conditions that are far from being optimal for wildlife and several other land users. The RMP/EIS states, that of 22,000 acres of riparian habitat inventoried, 91 percent is in poor or fair condition. The resource area contains 212 miles of streams of which 66 percent are in poor condition. Trout populations are present in 37 of the 73 streams inventoried and historically trout were found in most, if not all, of those streams. Of the 2,511,893 acres of native range inventoried, 67 percent of the native vegetation is producing at or below half of the plant community potential. A total of 52 allotments was shown to have an apparent downward trend. We feel these statements in the RMP/EIS certainly warrant some decisive and far-reaching management commitments to bring about improvement.

Comment Letter 20

Mr. John B. Walker
November 5, 1985
Page 2

We feel that through the selective management process and the subsequent categorization of 27 "I" allotments (approximately 70 percent of the resource area), that a positive commitment toward the first step in good range management has been made. We certainly commend the Bureau for such a positive approach to the categorization process. However, we feel the goals of improved management fall short of that needed to restore productivity to much of the wildlife habitat. For example, in the Environmental Consequences chapter, we see the following goals as being less than satisfactory to resolve some of the resource conditions previously stated:

1. Three percent of the native vegetation would move toward the potential native community and the remaining 97 percent would not change over the long term.

2. Fifteen percent of riparian vegetation would improve in habitat quality and 85 percent would remain unchanged or decline.

3. Habitat quality would improve on 106 acres of protected spring site riparian vegetation and 1,144 acres would decline or remain unchanged.

4. Aspen stands would remain unchanged or decline overall on approximately 14,000 acres.

In order to address and correct some of these conditions and goals we strongly recommend that the Bureau select the wildlife objectives under Alternative C. If these goals are not selected, we would request an explanation why such a decision was not made. In recognition of the importance that riparian areas play in overall productiveness of the resource area, we recommend that one more management guidance standard be adopted. This would be the acceptance of the American Fisheries Society paper entitled "The Best Management Practices for the Management and Protection of Western Riparian Stream Ecosystems" as the fundamental management standard for stream riparian areas in the Elko Resource Area. 20-1

Even though wildfire was not identified as an issue in the planning process, we feel that its effects in the resource area are significant enough to warrant some goals and objectives. For example, just this year alone approximately 153,800 acres were burned. Many of these areas were valuable wildlife habitat and in all probability a major percentage of it will never, at least in the foreseeable future, return to its former productivity. We request that the RMP/EIS address this concern and adopt some guidelines that will promote the restoration of native plant species where needed to maintain wildlife populations on critical and crucial habitats. 20-2

Response Letter 20

20-1 See response 19-1.

20-2 The concern of wildfire rehabilitation was not identified as an issue during the scoping phase of the planning process for the Draft RMP/EIS (Refer to page 1-4 of this document for further information). However, established vegetative objectives, while not specifically developed for fire rehabilitation, adequately incorporate your concern of restoring native plant species within crucial wildlife habitats. Specific measures for wildlife habitat restoration will be further discussed in the fire management plan for the district which will be developed following the Record of Decision on this RMP/EIS. Wildlife habitat restoration can also be accomplished through other avenues of funding, e.g. contributed funds, rangeland improvement funds or contributions of shrub seedlings. Historically, fire rehabilitation funds have been limited to specific criteria othern than solely for wildlife habitat.

Comment Letter 20

Mr. John B. Walker
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Page 3

The long-term proposal to increase livestock AUM's 30 percent above the current three to five-year average use does merit serious consideration to assure that impacts to wildlife habitat will be avoided. We support livestock increases if wildlife conflicts can be avoided, but we also advocate livestock reductions if wildlife conflicts are increased. The ultimate AUM goal is really irrelevant as long as a comprehensive and effective monitoring program is conducted to assure that range resources are not degraded. We totally support monitoring and feel that under the present range management system it is the best way decisions can be supported.

In our review of the RMP/EIS, we recommend that the following alternatives be selected for each issue category:

Legal Access	- Alternative D
Lands and Realty	- Alternative C
Corridors	- Alternative C
Wilderness	- Alternative D
Livestock Grazing	- No Recommendation
Wildlife	- Alternative C
Horses	- Alternative D
Woodland	- Alternative D
Minerals	- Alternative D

SPECIFIC COMMENTS

Page 1-5

20-3 The document states that the plan will be revised periodically (a minimum of five years) to determine the need for amendment. Can amendments or addendums to the RMP/EIS be submitted and activated at anytime or does the five-year minimum refer only to the review process?

Page 2-1

The public may have some comment on ACEC's if some candidate areas were proposed for review and comment.

20-4 What makes Alternative D a balanced approach?

Page 2-3

20-5 Why could not an alternative be developed that would continue the average level of use of 305,247 AUM's and still initiate the management actions of Alternative D?

20-6 Are there studies that show current management is providing only 20,338 AUM's of forage for existing numbers of mule deer?

Response Letter 20

20-3 Once the Record of Decision is finalized, any modification to the plan would be implemented in compliance with 43 CFR 1610.5-5 and 43 CFR 1610.5-6 under the guidance of BLM Manual 1617, Resource Management Plan, Approval, Use and Modification. A plan amendment is used to consider a proposal or action that is not in conformance with the plan. This may occur anytime after the Record of Decision is completed.

We wish to clarify your letter by requesting you change "...revised periodically..." to "...reviewed periodically..."

20-4 After considering comments from all phases of public participation, Alternative D is a blend of uses which accommodates the multiple use policy and sound management practices required by law and regulation. The alternatives considered provide a wide array of viable alternatives (exclusive of Alternative E, the elimination of livestock grazing, which was provided as a basis of comparison) emphasizing commercial or noncommercial issues or resources. Alternative D was the combination of uses and authorizations which appeared to provide for more orderly economic and social growth for the local and regional area on an overall basis.

20-5 Alternative D represents the continuation of the existing average licensed use (based on licenses from 1979 to 1983) of 305,247 AUMs with the projected availability of livestock forage at 402,096 AUMs over 20 years following implementation of the plan. This 30 percent increase in available forage over existing use levels is expected to be attained through a number of management actions including range improvement and development and through management systems, i.e. allotment management plans. The objectives and management actions proposed for other resource uses in conjunction with the livestock projections and objectives have been determined to be compatible and attainable.

20-6 The estimated forage use levels for reasonable numbers were a result of calculations based upon data provided by the Nevada Department of Wildlife (NDOW). Reasonable numbers and season of use by big game use was provided and can be found within the following document, Wildlife Habitat plans for the Future, In: Input into Land Management Agencies Planning Systems - Elko Resource Area developed by NDOW. See reference page R-3 of Draft RMP/EIS.

The estimated forage use levels for existing numbers were also a result of calculations based on data provided by the NDOW. From information found within the 1984 season investigations and recommendation for both mule deer and trophy species, the percent, by management area, differences between existing numbers and reasonable members was determined and incorporated into the calculations.

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Mr. John B. Walker
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Page 4

Page 2-5

20-7 Would land be sold just because it is difficult and uneconomic to manage or would other factors also be considered?

Page 2-8

20-8 In Alternative B, the objective to treat or seed 635,000 acres and spend $14,000,000 on livestock range improvements seems inappropriate and unrealistic under current budget restraints. We question that this alternative is even necessary or feasible.

Page 2-13

20-9 In Alternative C it states that: (1) direction is to implement an RMP which would allow livestock grazing at use levels which would avoid significant conflicts with sensitive resources, and (2) grazing systems and range improvements would be implemented to enhance overall rangeland vegetative condition. This would appear to imply that Alternatives A, B, and D would result in significant conflicts with sensitive resources and grazing systems and range improvements would not enhance overall rangeland vegetative condition. Is this the intent?

Page 2-15

20-10 In Alternative D, how many acres of the 243,200 acres identified for transfer are proposed for disposal under the DLE and Carey Land acts?

Page 2-16

20-11 What is a low visibility corridor? If this means a setback of a certain distance from the highway despite conflicts with wildlife, we certainly have some concerns. An example of our concern was exemplified by the Elko Secondary Source powerline which was placed one-half to one mile away from the highway despite our recommendation to use an existing corridor adjacent to the highway.

20-12 We have no concerns and agree with the designated SRMA's. However, we do have a question concerning the South Fork of the Humboldt River SRMA. We thought the land ownership and management of the area was going to State Parks.

20-13 The Department supports acquiring legal access for the public and public land administration. Would any of the legal accesses (Table 2-4) be closed to the public?

Response Letter 20

20-7 Many factors are considered prior to the disposal of a parcel of land. These factors are evaluated through the environmental assessment process which will be undertaken for every land disposal that is contemplated. Difficulty in management of a parcel can cause its consideration for sale and its manageability will be among the factors weighed in a disposal decision.

20-8 The anticipated expenditures for range improvement projects under Alternative B were a result of consultation with range users. Monies obtained through the availability of additional AUMs and contributions by range users are expected to equal these expenditures. This alternative selection is supported by the recent U.S. Circuit Court decision, NRDC et al. vs. Hodel, which states "Judicial review of the range of alternatives considered by an agency is governed by a rule of reason that requires an agency to set forth only those alternatives necessary to permit a reasonable choice "and "... alternatives must be viewed under a rule of reason and are to be measured against the scope of the proposed action."

This is also consistent with Bureau policy which states "Additional alternatives shall be developed through the Bureau of Land Management's Planning System... One alternative may be developed around how the (grazing) permittee ... would propose the allotments to be managed." (IM 82-650, Washington Office). As stated within the Final Grazing Management Policy, "Alternatives analyzed in the EIS must describe a full range of management practices, including various levels of livestock grazing use. Recommended minimum alternatives are: The proposed action; no action; no grazing; increased livestock grazing use; and decreased livestock grazing use." This EIS fully complies with this policy.

20-9 Refer to pages 2-3, 2-8, and 2-18 of the Draft RMP/EIS for the objective and interest for each alternative.

20-10 Of the acres identified for potential transfer in the RMP/EIS, no specific areas have been marked for development under the Desert Land or Carey Act. This is due primarily to the fact that both acts require water of sufficient quantity to permit irrigation of the entries. To date, water availability has not been established for public lands in the planning area. Therefore, it is impossible to predict amounts or exact locations of lands for disposal under these acts. General criteria have been established for responding to the applications on file when water information does become available. This may be found in Chapter 3, Revisions and Errata.

20-11 Low visibility corridors were defined on page 2-11 and G-2 of the Draft RMP/EIS. Facilities in these corridors would be accommodated only if they would not be evident in the characteristic landscape. This designation does not impose any minimum distance restriction from the key observation point (Interstate 80). The Elko Second Source powerline was not constructed using this low visibility concept. Wells Rural Electric Company's Elko to Carlin 120 kV was. This 120 kV powerline parallels Interstate 80 coming within ½ mile of it, yet is seldom seen within the zone.

20-12 To date the Division of State Lands, on behalf of the Division of State Parks has been offered a Recreation and Public Purpose Lease with an option to purchase on 580 acres generally located above the high water mark on both sides of the proposed South Fork Reservoir.

Comment Letter 20

Mr. John B. Walker
November 5, 1985
Page 5

Page 2-16, Wilderness

We do support the Wilderness proposal as presented in the preferred alternative.

Page 2-18

20-14 Does the treatment of 120,978 acres include retreatment of old seedings?

20-15 Will all treatments or seedings have to meet a positive B/C ratio and how long is the period of amortization? When the B/C ratio is developed, will documented adverse impacts to wildlife be added to the cost of the project?

20-16 In our departmental briefing session with the Bureau on the Elko RMP/EIS, it was our understanding that none of the 120,978 acres of treatments or seedings will be located on crucial or key wildlife ranges. Is this correct; and if correct, where in the RMP/EIS is reference made to this?

Page 2-25 through 2-36, Specific Resource or Program Guidance

20-17 The selective management section really did not discuss levels of monitoring. Will all "I" category allotments receive sufficient monitoring upon which to execute grazing decisions in three to five years after the Record of Decision is signed?

We request that the degree of allowable livestock use of browse species on delineated big game winter ranges be no more that 30 percent in any season, not the 50 percent shown in the table on page 2-32. Also some of the use seems rather high, particularly if associated with riparian areas.

We request that guidelines be included that do not allow the routine harvest of live mountain mahogany or standing deciduous trees, unless the harvest is to meet specific habitat management requirements.

Under the Wildlife and Threatened and Endangered Habitat Management Program, we highly recommend the riparian pasture as a very beneficial management concept which would accomplish several objectives.

We recommend that the Bureau encourage and authorize, to the extent feasible, the use of track-mounted drill rigs.

Response Letter 20

20-13 Prior to acquisition each individual road will be subject to a route analysis which will consider the level of access to be acquired. In most cases, full access, including the public's right of access, will be acquired. However, there may be situations where public access will not be acquired. The physical location of the road (through a person's yard), the lack of public use of the area, or temporary closure (road out, bridge out, weather, crucial wildlife habitat, fire danger, etc.) could all result in the loss of access.

20-14 This projection of treatment acres includes retreatment of existing seedings.

20-15 All treatments and seedings will have B/C analyses completed, however a positive B/C is not required where resource or social criteria provide a firm rationale for further consideration. This is in compliance with the Bureau's Final Rangeland Improvement Policy of October 15, 1982. The period of amortization varies by project type. Adverse impacts to wildlife can be accounted for in the B/C analysis process.

20-16 The understanding is correct that none of the proposed acres of vegetation manipulations under Alternative D are in crucial wildlife ranges. This is documented in the discussion on page 4-31 under the section "Wildlife Habitat". No impacts to crucial ranges are identified. This is in contrast to Alternative B, page 4-13 which projects impacts to crucial big game ranges.

20-17 The vegetation monitoring program on "I" category allotments was initiated in 1982. Currently 33 percent of the planning area is under vegetation monitoring. All monitoring actions are in compliance with existing regulations and policy as discussed on pages 2-28 and 2-31 of the Draft RMP/EIS. It is expected that monitoring data gathered on I allotments within five years after the Record of Decision is signed will give the information necessary to make recommendations to either make a decision or establish an agreement to adjust stocking levels.

Comment Letter 20

Mr. John B. Walker
November 5, 1985
Page 6

We recommend that the Bureau outline what bonding requirements will be needed for the reclamation of areas disturbed by mining and mine exploration. We also encourage guidelines that will keep new cut-fill roads, associated with mineral exploration, to a minimum, to avoid critical habitats such as riparian zones, aspen stands, etc., and be closed as soon as possible. Native plant species should be seeded at suitable sites.

Page 3-8, Big Game Population and Habitat Condition

The Bureau's big game studies to date report that crucial mule deer summer habitat to be in fair to good condition and crucial winter habitat to be in good to excellent condition. To someone unfamiliar with the area, this would give the impression that mule deer habitat and populations are good and that habitat is not a limiting factor in the Elko Resource Area. This certainly is not the case. We must point out that these studies represent only a small percentage of the habitat. In addition, mule deer populations are far below historical levels and literally thousands of acres of very valuable mule deer habitat have been lost or severely degraded due to wildfire, livestock (see page 3-11), and mining activities.

Page 3-9

The Terrestrial Riparian Habitat portion states that the primary habitat conflict is the trampling of water sources. We question whether this is true. Probably of greater concern is erosion channel cutting which results in lowering of the water table and subsequent loss of riparian habitat. Forage overutilization and roads are also sources of conflict.

Page 3-22

20-18 Were expenditures for trapping included in the $3,160,000 total for hunting and fishing? Were trapping revenues included in the total income figure?

In conclusion, we feel the Elko RMP/EIS does adequately recognize most of the concerns we identify with wildlife habitat. The degree to which those concerns will be resolved is still a question of considerable concern. In relation to other RMP's/EIS's which have been prepared by the Bureau in Nevada, the Elko RMP/EIS is better for wildlife than most. However, none of the RMP's have met our expectations in regards to commitments for the management of basic land resources (soil, water, vegetation), upon which wildlife are totally

Response Letter 20

20-18 Estimated activity days and associated expenditures for trapping were included with the estimates for hunting in Chapter 3. They were also included with the hunting estimates used in Chapter 4 for the analysis of potential income and employment effects.

Comment Letter 20

dependent. We felt the RMP made some solid commitments to riparian concerns, but we still have a concern that much riparian habitat will decline over the long term. We applaud the goal of establishing 27 AMP's and the placing of nearly 70 percent of the resource area in the "I" category. This categorization when integrated with effective monitoring and environmentally sound objectives for the resource area will result in improving ecological conditions.

Sincerely,

William A. Molini

William A. Molini
Director

LB:pw

cc: Region II

Comment Letter 20

RICHARD H. BRYAN
Governor

STATE OF NEVADA

ROLAND D. WESTERGARD
State Historic Preservation Officer

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 885-5138

November 5, 1985

MEMORANDUM

TO: John Walker, Office of Community Services

FROM: Alice M. Becker, Staff Archeologist Alice M. Becker

SUBJECT: DRAFT/ELKO RESOURCE AREA RMP & EIS, SAI NV 086300014.

The Division has reviewed the draft Elko Resource Area RMP and EIS. As described in the document, numerous historic and archeological properties eligible for inclusion in the National Register of Historic Places are located in the Elko Resource Area. We recognize that under specific resource program guidelines, the BLM will comply with the National Historic Preservation Act of 1966 (NHPA), as amended, and Executive Order 11593 prior to construction of wildlife and livestock improvements. However, we are concerned that management of land as recreation areas and the increase in public access roads may have indirect impacts to Register eligible properties not addressed by the RMP and EIS. During road planning and development of management plans for the recreation areas, the BLM must examine whether such actions will increase acts of illegal collection or vandalism. In the case of road building, the BLM should consider alternatives where the placement of a road may increase access to fragile archeological resources.

As part of the management of the Elko Resource Area, the BLM must also follow Section 101 and 110 of the NHPA regarding the establishment of a program to nominate properties to the National Register.

If the BLM has any questions regarding these comments, please have Elko staff call me.

AMB/de

Comment Letter 20

RICHARD H. BRYAN
Governor

STATE OF NEVADA

RICHARD E. MANBURN
Director

DEPARTMENT OF MINERALS
100 W. King Street, Suite 106
Carson City, Nevada 89710
(702) 885-5050

October 30, 1985

NOV 04 1985

MR JOHN WALKER
Clearinghouse Coordinator
Office of Community Services
1100 East William Street - 117
Carson City, NV 89710

RE: SAI NV #86300014

Dear Mr. Walker,

The Nevada Department of Minerals appreciates the opportunity to comment on the Draft/Elko Reosurce Area RMP & EIS, SAI NV #86300014.

We appreciate the fact that mineral resource management was treated as an issue in the draft documentation. However, we have concerns regarding the designated mineral potential. We believe that an area's true mineral potential can never be fully known until actual exploration and mining occur. In many cases, major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seems to have little or no mineral potential into a prime exploration target. From our viewpoint, wilderness areas should only be considered if an area has no mineral potential, that is, areas with sufficient geologic data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

We support the BLM's preferred alternative for the Red Spring and Cedar Ridge WSA's, which recommends that these areas are not suitable for wilderness designation. Both the Red Spring and Cedar Ridge have high favorability for oil and gas, and moderate favorability for barite and other minerals.

We are opposed to wilderness designation for the Rough Hills WSA. There are several mines north of the WSA with new discoveries being made periodically. Production of gold, silver, copper and lead has occurred from the Black Warrior, Cleveland, McKnights Placer, Vanity Fair and Virginia mines located only 2-3 miles east of the WSA. According to the USGS open-file report 1976-56, Mineral Resources of Elko County, Nevada, the Virginia mine produced 450 tons of ore averaging 2.8 ounces gold per ton, 2.3 ounces of silver per ton along with 0.74 percent copper and 3.7 percent lead. Although there have been no mining claims located within the Rough Hills WSA, we feel there is a moderate mineral potential based on demonstrated surrounding mineralization.

Comment Letter 20

We are also opposed to wilderness designation for the Little Humboldt River WSA. Our concern is the mineral potential in the northeastern portion. Two prominent roads also exist in that portion. We note that the mining claims and area of mineral potential in the southeastern portion of this WSA are not included in the preferred alternative. We feel that, at the very least, the preferred alternative's northeastern boundary should be adjusted to exclude the area of mineral potential.

The Department does value preserving some public land for future generations and scientific study, as long as the mining industry, which is so essential to our national defense and this state's progressive economy, can remain healthy and be provided the opportunity to pursue new mineral resources.

Sincerely,

Doug Driesner

Doug Driesner
Resource Engineer

DD:wf

Comment Letter 20

DIVISION OF STATE PARKS

MEMO

TO John Ilker

FROM Steve Weaver

DATE 10/17/85

SUBJECT DRAFT ELKO RESOURCE AREA RMP
SAI# 86300014

The Division of State Parks supports the draft Resource Management Plan for the BLM Elko Resource Area. However, we do wish to express our concerns about the proposed recreation sites at Wild Horse and South Fork Reservoirs.

Both of these areas need to be managed in conjunction with the corresponding state recreation area. Thus, close cooperation with the Nevada Division of State Parks will be desirable. However, unless BLM is willing and able to make the necessary financial and personnel commitments, the Division anticipates problems that will inevitably affect the adjacent state lands. If there is any possibility that the Division is going to eventually be saddled with the burden of managing these BLM areas, contingency plans should be considered now for a cooperative management agreement or outright transfer of the lands involved.

SW:vh
801.6b(5)

a division of the Department of Conservation and Natural Resources

Comment Letter 20

RECEIVED
AUG 13 1985
ENVIRONMENTAL PROTECTION

NEVADA STATE CLEARINGHOUSE

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 117
CARSON CITY, NEVADA 89710
885-4420

TO:

- ___ Governor's Office
- ___ Attorney General
- ___ Administration
- X Agriculture
- ___ Commerce
- ___ Community Services
- ___ State Job Training Office
- ___ Economic Development
- ___ Education
- ___ Employment Security Department
- X Dept. of Minerals
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- X UNR-Bureau of Mines
- X UNR-Dept. of Range, Wildlife, and Forestry
- X X Wildlife
- ___ Press Room-Capitol Building
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Conservation and Natural Resources

- X State Lands
- ___ Conservation Districts
- X X Environmental Protection
- X Forestry
- X Hist. Preservation & Archeology
- X X State Parks
- ___ Water Planning
- X Water Resources
- ___ ___
- ___ ___
- ___ ___

FROM: John B. Walker, Coordinator

SAI NV # 86300014 PROJECT: Draft/Elko Resource Area RMP & EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 11/7/85. Type your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office. Reviewers may substitute this form with agency letterhead. If letterhead is used, please site the SAI number listed above in your comment.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

- ___ No comment on this project
- ___ Proposal supported as written
- ___ Additional information (see below)
- ___ Conference desired (see below)
- ___ Conditional support (outlined below)
- ___ Disapproval of funding (must specify reason below)

Comments: (use additional sheets if necessary)

NOTE: The Clearinghouse has tentatively set a briefing for October 4, 1985.

AIR-Dick Serdoz: No comment

WATER-Ralph Capurro: The water quality section of Div. of Environmental Protection (DEP) supports the BLM's attempt to improve the aquatic habitat conditions as outlined in Table 4-1 of the Draft Resources Management Plan for the Elko Resources Area. This table shows a decided

Notice sheet attached

Reviewer's Signature	Title	Phone	Date
[illegible]	Administrator	885-4670	11/6/85

Comment Letter 20

Page 2

Clearing House Comments

SAI NV #86300014 Draft/Elko Resource Area RMP & EIS

Water- Continued: improvement in the "good" and "excellent" conditions from 11 miles (for the existing condition) to 117 miles (for the prefered alternative) caused by the reduction of poor and fair conditions from 201 miles to 95 miles. This improvement should improve the water quality in various streams rivers in Nevada. The DEP would appreciate the opportunity to comment on the specific projects proposed to accomplish this aquatic habitat improvement.

WASTE-Verne Rosse: No comment.

tm

Comment Letter 21

ELKO COUNTY RECREATION BOARD

P. O. BOX 17 ELKO, NEVADA 89801

November 14, 1985

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

RE: Draft Elko Resource Area
Resource Management Plan and
Environmental Impact Statement

Dear Mr. Harris:

During our review of the Draft Resource Management Plan and Environmental Impact Statement for Elko Resource Area, we noted that the preferred alternative recommends designating 3,360 acres downstream from the proposed South Fork State Recreation area as the South Fork Humbolt River Special Recreation Management Area. As developers of the South Fork State Recreation Area, the Elko County Recreation Board strongly supports this compatible land use. We believe it would enhance the recreational resources of both recreation areas. The South Fork State Recreation Area master plan calls for equestrian and hiking trails which lead into the BLM land adjacent to the park, including the downstream areas.

Hydrological analysis for the South Fork Dam indicates that the 100-year flood plain downstream from the dam and the 200-year flood plain downstream from the emergency saddle dam should be evaluated when and if any development plans are proposed in Sections 4 and 5, Township 32 North, Range 55 East.

The Resource Management Plan EIS has analyzed the potential economic benefits of increased hunter and angler days to the Elko regional economy. Significant economic benefits will also be realized from non-wildlife-related recreation days for camping, boating, and horseback riding. These increased recreational opportunities will also satisfy significant portions of the excess resident and non-resident recreational demand in Elko County.

Comment Letter 21

Thank you for this opportunity to review the Draft Resource Management Plan and Environmental Impact Statement. If you have any questions about these comments, please contact Marvin Davis or Pam Cosby with Chilton Engineering, Chartered (702-827-6660).

Sincerely,

Robert McBride
Chairman

RM/jo
c.c.: Marvin Davis

Comment Letter 22

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

PLEASE REPLY TO: ☐ _____

☐ GREAT BASIN GROUP
P.O. Box 8096
University Station
Reno, Nevada 89507

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

November 14, 1985

Nancy Phelps, RMP Team Leader
BLM/Elko District
PO Box 831
Elko, NV 89801

Dear Team Leader Phelps,

On behalf of the Toiyabe Chapter of the Sierra Club, I am submitting comments on the Elko Draft Resource Management Plan and Environmental Impact Statement. I am also submitting comments as a member of the Natural Resources Defense Council, Nevada Outdoor Recreation Association, Defenders of Wildlife, the National Wildlife Federation, and the Wilderness Society.

As a conservationist with specific interests in improving public rangeland conditions, wildlife habitat, and riparian area management, as well as in generally improving public land management, I am very disappointed in the Draft Elko RMP/EIS. As currently proposed, the draft plan emphasizes the development and aggrandizement of commodity uses of the public lands at the expense of and to the direct detriment of non-commodity public land uses, including soil & water conservation, range condition improvement, wilderness, wildlife habitat, and riparian/fisheries habitat. The draft EIS consistently overemphasizes the benefits of resource development, while underestimating the costs of that development, both financial costs and costs in terms of continuing resource damage. At the same time, the document underestimates the values of non-commodity resources, both economic and non-economic. My specific comments are as follows:

Elko Wilderness Technical Report: This document is an exception to the generally superficial and inadequate nature of the Elko planning documents. The wilderness report was obviously written by BLM employees who actually have been in the areas, and who can appreciate the wilderness qualities of the areas , as well as objectively judge and report on manageability and quality standards. The excellence of the report is only qualified by the "political" requirement they had to emphasize (and thus justify the Alternative D recommendations) the wilderness values in the Rough Hills and Little Humboldt River WSAs, while de-emphasizing similar values in the Cedar Ridge and Red Spring WSAs.

My only specific comments on the Report concern statements on p.7. Only potentially adverse impacts of wilderness designation are mentioned on range and cultural resources. Omitted are potential beneficial impacts of decreased vehicle-dependent

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

Comment Letter 22

vandalism and rustling which would be limited by the motor vehicle restrictions.

Summary Table I: Management Actions. This Table should include by alternative the expected improvements (or decreases) in ecological condition, so that the public can compare the changes in condition along with other impacts of the different alternatives. This Table should also include the costs of each alternative, so the the public can compare the impacts in terms of the costs of each alternative. It is very difficult to keep turning from Table 2-2 on p. 2-9 to the summary table in the beginning of the document.

Chapter I: We were glad to read on p. 1-4 that "Public land resources were inventoried to establish a data base upon which to develop a resource management plan and analyze the impacts expected from the various alternatives." It is not clear from the document how much specific inventory data was collected on each resource, nor exactly how the inventory data was used. In addition, I do not understand how inventory data can be adequate for planning, but not adequate on which to base management decisions, such as reducing livestock to the carrying capacity in each allotment. Please clarify. 22-1

Chapter 2: The entire alternative formation process is faulty. The range of alternatives is inadequate on livestock grazing. The management action for livestock numbers resulting from each alternative except for the no-grazing alternative is exactly the same for each alternative; that is, existing numbers! Alternative A proposes to continue existing numbers, until monitoring indicates upward or downward adjustments. Alternatives B and C propose to increase livestock numbers by 62% if monitoring supports an increase. Alternative C proposes to decrease numbers by 37% if monitoring supports a decrease. The only action the BLM plans to take is to continue licensing existing numbers until and unless monitoring indicates a change is justified (by BLM standards). Because there is really only one alternative, the public is effectively denied the opportunity to participate in the decision on how much livestock use is to be permitted on the public lands, and, consequently, how much wildlife and wild horse use should occur and what conditions public rangelands should be managed for.

We also object to the BLM rationale which dismisses most of the non-commodity resources as "not significant," therefore, relieving the agency of considering all public land resources in its comprehensive land use plan. Such a process can only result in emphasizing existing management programs which are slanted towards continuing the status quo. 22-2

Alternative A: We do not understand the objective for wilderness on p. 2-3 (or in other alternatives)- "Manage all lands currently under wilderness review as nonsuitable for wilderness designation." We believe the Interim Wilderness Management regulations apply to all WSAs, whether recommended suitable or 22-3

Response Letter 22

22-1 The specific inventory information for each resource is available from district files. Inventory data was used to develop the range of alternatives and assess impacts as a result of implementation of the alternatives.

Inventory data that is used to make decisions, such as reducing livestock, must be adequate to stand up to appeals and litigation whereas inventory data for planning does not have to meet such criteria. This is supported by the recent U.S. District Court decision, NRDC et al vs. Hodel; where the judge stated "Although the BLM will have to use site specific data in adjusting livestock levels... it does not necessarily follow that such data must be analyzed in the EIS, in precisely the same detail."

22-2 No resources were dismissed as "not significant". However, determinations were made that management proposals would introduce as significant changes in the existing utilization of some resources. Extensive analysis was determined to be unnecessary, in accordance with the National Environmental Policy Act.

22-3 As mentioned on page 1-6 of the Draft Elko RMP, the wilderness planning issue is to determine which WSAs, or portions thereof, should be recommended suitable and nonsuitable for wilderness designation. Therefore, the objectives are written in terms of being suitable or nonsuitable for wilderness.

Yes, as a matter of Bureau policy and as stated on page 1-6, the Bureau will "manage lands under review in a manner that will not impair their suitability for wilderness designation."

Comment Letter 22

non-suitable by BLM, until Congress decides on wilderness designation. Please clarify.

22-4 Table 2-2: Why are there no "rangeland improvement projects" figures included for Alternative A in this table? Shouldn't the current BLM budget for planned range improvements projects be included in this table for Alternative A?

22-5 Alternative D: We were glad to finally find a range condition improvement goal in one of the alternatives. However, we do not understand what is meant by "improving rangeland vegetative conditions." This term is not defined in the glossary. Does the statement refer to ecological status? to range forage conditions? to a scale of excellent-good-fair-poor? Issue 7 refers to livestock permits, vegetation manipulation projects, livestock range improvements, categorization, and monitoring, but sets no specific objective for how much improvement in range condition will be obtained from all these management actions.

22-6 We support BLM's commitment to improving riparian area conditions and management (Alternative C). However, we do not see how the estimated improvements can be achieved given the commitment to a 30% increase in the preferred alternative for livestock numbers. It is ludicrous for BLM to promise to increase livestock numbers when there is insufficient forage capacity to carry existing livestock numbers. This promise is also based on an optimistic assumption of a high level of funding for livestock range improvements when the agency budget is declining annually. We urge BLM to modify Alternative D to increase or decrease livestock numbers to the carrying capacity of the allotments, based on whatever existing data is available with further adjustments when monitoring data supports a change.

We support wild horse and wildlife objectives and actions in Alternative C. But we have the same questions about whether these commendable goals and objectives can be achieved without necessary livestock reductions.

22-7 We support wilderness recommendations in Alternative D and recreation recommendations in Alternative C. We support Alternative A for land disposals and utility corridors. No information in the draft justified the excessive proposals for land disposals or utility corridors, other than statements that "requests" had been made.

Management Resource or Program Guidance: This section is very weak. Applicable BLM handbooks and regulations are not cited for most resources. The wilderness section should be supplemented by reference to Report No. 96-617 "Designating Certain National Forest System Lands in the National Wilderness Preservation System, and For Other Purposes" which details management actions permitted in wilderness.

Selective Management Policy. The Sierra Club is on record as opposing this policy, because it rewards (with range improvement

Response Letter 22

22-4 As stated on page 2-3 of the Draft RMP/EIS under the Short and Long-term. Management Actions - No new range improvements or land treatments would be implemented. This was made part of the alternative, since no range improvements were projected.

For purposes of analysis, the No Action Alternative for range improvements was based on existing improvements. This is done to limit variables in analysis. This is consistent with the Final Grazing Management Policy which states that "no action" means the "current situation."

22-5 Refer to Chapter 3, Revisions and Errata. The statement "improving rangeland vegetative conditions" has been changed to "improving ecological status." For further information, please refer to page 2-33 of the Draft RMP/EIS.

22-6 It has been projected that through the implementation of the level of range improvement and management, as specified by this plan, including the management guidance, the level of riparian improvement projected will be attainable over the term of this RMP.

22-7 Our alternatives were developed to present an array of actions to resolve issues. Alternative B maximized resource uses and our proposals were based on all public input received. Sale parcels identified included a request for a 48,000 acre sale and the corridor section identified every corridor shown in the Western Regional Corridor Study.

Alternative A, No Action, made no proposals for resolving the issues. The Preferred Alternative, which is now the Proposed RMP, has attempted to strike a balance among uses while meeting as many user needs as possible. Land sale disposals have been sharply reduced and are limited to meet community expansion needs and disposing of isolated lands difficult to manage. Exchange remains the most desirable form of disposal. Corridors were reduced to provide basic connections to adjoining areas.

Comment Letter 22

funds) poor management in I allotments, but essentially ignores both good management in M allotments and abysmally poor management in C allotments. While we do not object to priortizing management efforts, our conservation ethic prevents us from condoning agency attempts to write off any allotments in terms of monitoring and management, and our common sense prevents us from endorsing a system which builds in financial incentives for poor management.

Notwithstanding our policy on MIC categorization, we read with great interest Table 4 in Appendix C. While we support the large acreage put into the I category, we could find no rhyme or reason why some allotments were designated I and others with the same or greater I ratings in the 7 criteria were not designated. 14 allotments with I ratings in 6 or 7 criteria were finally designated as I allotments. 24 allotments with I ratings in 5 categories were designated I; but 2 were designated M and 1 was designated C. 8 allotments with I ratings in 4 categories were designated I with the others designated either M or C. 4 allotments with I ratings in 3 categories were designated I and amazingly enough, one allotment with I ratings in only 2 categories was designated I. The draft document does not disclose that BLM weighted some categories over others, a procedure which could explain these discrepancies. If weighting does occur, we would certainly support weighting the 7th category, existing ecological condition, over the other categories.

22-8 Key Forage Plant Utilization: Does the table on p. 2-32 include utilization by livestock only, or by all grazing animals? If the allowable use levels do not include all use, they are much too high.

22-9 Ecological Status: We do not understand the statement on p. 2-33 that "Ecological status is use-independent..." Please explain.

22-10 Do the four seral stages correspond to the excellent, good, fair, and poor scale used in most other BLM land use plans?

22-11 Appendix 5: Table 2: If BLM can use existing data to derive current and projected seral stages down to one acre in every allotment, why can't BLM use existing data to determine livestock carrying capacity in each allotment?

22-12 Table 1: Appendix 3: What data are the "apparent trends" in this table based on?

Maps: The maps at the end of Chapter 2 are very misleading. They imply resource conditions and management actions over the entire area. Not until the next chapter is information presented to illustrate that BLM administers only a little over 50% of the area. Land status information should be included in every map.

Chapter Three: This entire chapter is superficial with only cursory information provided on most resources and resource conditions. What little information is provided documents the

Response Letter 22

22-8 This table represents the total allowable use levels for all grazing animals.

22-9 The term "use independent", as applied to economic status, means that the vegetation ratings are not "value ratings" based on what kinds of animals i.e. wildlife, livestock or wild horses, are or will be using the sites.

22-10 The four range forage condition classes were originally "value ratings" and differ from seral stages which are purely ratings based on a site's potential for a certain kind of plant association. We cannot comment on how our seral stages compare to condition classes mentioned in past documents without knowing exactly what document you are referring to.

22-11 Estimated levels of grazing use were presented in Appendix 3, Table 2 of the Draft RMP/EIS, "Projected Livestock Stocking Level (AUMs) by Alternative". These estimates are, however, based on one point-in-time inventory information. Under this policy, changes in livestock stocking levels will be based on the procedure described on page 2-31 of the Draft RMP/EIS, not independently on one point-in-time inventory data.

22-12 As described on page A-46 of the Draft RMP/EIS under the discussion of intensity of inventory, apparent trend was estimated on "I" category allotments using the criteria developed by the Nevada Range and Monitoring Task Group. Apparent trend was determined through review of thirteen vegetation and soil factors identified in the Nevada Rangeland Monitoring Handbook. Among these were frequency grouping, vigor of key species and soil movement factors.

For "M" and "C" Category allotments, apparent trend was estimated for analysis purposes using professional judgement.

Comment Letter 22

adverse impacts of past land management activities, especially poor livestock management, on most of the other resource values.

22-13 Lands and Realty: The explanation totally ignores the management requirements of the checkerboard land pattern. Does BLM manage the checkerboard lands like consolidated public lands?

22-14 Livestock Grazing: We were shocked to learn that 85% of the allotments are not intensively managed. Are these "wild cow" operations or is some kind of grazing system in use in these allotments?

Wildlife Habitat: Wildlife habitat (including riparian and aquatic habitat) is very poorly managed with poor conditions, downward trends, and depressed populations for almost every species. While we support the proposed actions to improve wildlife habitat, we don't feel that, even if fully implemented, they will be sufficient to reverse unsatisfactory wildlife habitat management, unless excess livestock numbers are reduced.

22-15 Please explain the statement "Major alteration in peregrine falcon habitat and current land status have eliminated the possibility for reintroductions within the planning area."

Chapter Four: These chapter is actually even more superficial and perfunctory than Chapter 3. Perhaps there are few significant differences in impacts among the alternatives because there are no significant differences in alternatives. Even the no grazing alternative shows little overall improvement in ecological condition. The impacts of livestock grazing on vegetation are separated out with livestock impacts being numbers of livestock and range improvements while changes in vegetation appear divorced from livestock use. The disastrously negative impacts of a 62% increase in livestock numbers and extensive monotypic range improvements proposed in Alternative B hardly inconvenience the already stressed wildlife at all.

The analysis of Alternative A does seem to support the fact that livestock numbers significantly exceed carrying capacity. The statement on p. 4-41 in the last paragraph is especially convincing. We were certainly glad to learn on p. 4-7 that "...49 allotments would show an improvement in ecological status due to continued stocking levels below forage capacity." Would you explain the basis for this statement? If BLM knows that 49 allotments are below the carrying capacity, then does BLM know how many allotments are over the carrying capacity?

22-16

Lands and Realty: The statement on p. 4-10, "...transferring 336,000 acres of scattered and difficult to manage parcels out of Federal administration through exchange," seems contradictory. If 336,000 acres are exchanged, presumably 336,000 acres of non-federal or federal land would be transferred to BLM, for a net effect of 0 acres transferred out of federal administration. Please clarify.

22-17

Response Letter 22

22-13 The management requirements of the checkerboard lands are not the issue under analysis by the RMP/EIS. The issue is land tenure adjustments. The checkerboard land pattern does have unique management problems that are dealt with on a case by case basis.

22-14 BLM has defined intensive management as a signed Allotment Management Plan (AMP). Fifteen percent of the resource area is under specifically approved and signed AMPs. As a result of a U.S. District Court suit we have been under court agreement with the U.S. District Court Judge for the District of Columbia and the Natural Resource Defence Council since 1974 which has limited development on existing AMPs and prohibited implementation or approval of new AMPs pending approval of the Final RMP/EIS. Of the remaining allotments not under intensive management, all are limited to their active preferences, some have voluntary grazing systems, and some have taken voluntary nonuse. All allotments are under use supervision.

With the implementation of the proposed RMP, intensive management would be designated for 22 Category "I" allotments and six category "M" allotments (Refer to page 2-18 of the Draft RMP/EIS).

22-15 The statement that major alteration in peregrine falcon habitat and current land status have eliminated the possibility for reintroduction within the planning area can be supported by the fact that riparian and wetland habitat on both public and private lands (in the area of historic occupation) has declined in both quality and quantity. Inventory data (Ballantyne and Jones 1981) indicated that prey base densities associated with the above habitats may be inadequate to support any reintroduction attempts. Suitable nesting, eyrie and/or hacking sites are for the most part located on private land. In the past a major dam and reservoir has been proposed for construction within the historic habitat. This has complicated past land exchanges and will likely complicate future land exchanges. When the above is combined with potential impacts associated with the construction of the dam and reservoirs, the area's suitability for reintroduction would be expected to be reduced.

22-16 In the allotments where AUM demand is less than the estimated available AUMs based on a one point-in-time inventory, it was determined that grazing is at a level that will not change succession. Stocking levels were projected for all allotments based on a one time inventory. Any adjustments to stocking level will be based on monitoring data. See page 2-31 of the Draft RMP/EIS for further information.

22-17 The assessment on page 4-10 states in its entirety, "An efficient management pattern could be established by transferring 336,000 acres of scattered and difficult to manage parcels out of Federal administration through exchange". The point in this statement being that this alternative provides for areas where the Bureau would prefer to reduce public lands administered by the BLM. These are areas where, due to a variety of reasons, they are not economic to manage. There are areas, denoted by the nonspeckled design, which contain lands determined to be valuable for resource management. Within these areas the Bureau has indicated that retention and management of these resources is beneficial. Due to the fact that lands do not have the same per acre value, that there are not specific proposals (usually generated by non-Bureau sources) and that exchanges are based on a consideration of resource values and fair market (monetary) value, the net change (if any) in acres is not available for analysis.

Comment Letter 22

Economic Conditions: The economic analyses are meaningless. For instance, impacts on the livestock industry assume that BLM actions occur in a vacuum - that BLM actions are the only factor influencing the livestock industry. The analyses totally miss the fact that the industry is in a slump due to lower beef demand with ranchers going out of business all the time. The economic analysis in Alternative B missed the impact of all that extra beef from a 62% increase in livestock numbers on beef prices and expected increased profits. The economic analyses omit the information that like most agricultural operations, most ranching operations are marginal at best, existing only on massive subsidies provided mainly by the federal government - below market value grazing fees, free livestock improvements, free predator control, etc. 22-18

All in all, the only way to significantly improve the draft RMP/EIS would be to rewrite it in its entirety. We do not feel that it is even minimally adequate as a comprehensive resource management plan which will guide resource management on over 3,000,000 acres of public land for the next 20 years.

Sincerely,

Rose Strickland, Chair
Public Lands Committee

6

Response Letter 22

22-18 Economic analysis in the Elko Draft RMP/EIS evaluates the potential beneficial and adverse effects of resource management alternatives upon the existing affected human environment.

These estimations are designed to be used by management in the selection of elements comprising the best alternatives for a resource management plan of action.

We recognize the cyclic nature of private, production, and cost relationships within the livestock industry. For that reason, purchase costs and selling prices used in the ranch budget analyses were based on a three-year average appropriate to the base-year community economic data. Such price and cost averages are widely considered to be a fair estimate of an expected average over the next several years.

BLM grazing fees for the base year were considered to be reflective of the relative production cost relationships at that time. Grazing fees for BLM administered lands are set by a legislative formula, established by Congress, which requires annual adjustment with reference to the price of beef and costs of production. It is reasonable to assume, therefore, that the relative production cost relationships, with reference to the grazing fee, will be maintained.

A 62 percent increase in AUMs on BLM lands in the Elko Planning Area would not be likely to have a measureable effect on beef prices.

Comment Letter 23

MEC

MINERALS EXPLORATION COALITION

Minerals Advocate In Public Policy

12640 West Cedar Drive
P.O. Box 15638
Denver, Colorado 80215
303/989-5567

Reply to:
☑ Denver, Colorado
☐ L. C. Lee

Washington Representative
L. Courtland Lee
3814 West Street
Landover, Maryland 20785
301-322-5762

November 13, 1985

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

Dear Mr. Harris:

The following comments constitute the response of the Minerals Exploration Coalition (MEC) to the Proposed Resource Management Plan and Draft Environmental Impact Statement (DEIS) for the Elko Resource Area. The MEC represents companies and individuals engaged in exploration for minerals on the federal lands.

The description of minerals on pages 3-15 to 3-16 and the maps showing leasable and locatable mineral potential give a good general overview of the known minerals and the mineral potential of the Elko Resource Area, but the description is lacking in certain respects.

Data should be presented for the Elko Resource Area to show the dollar value of past mineral production and known resources and an estimate of the value of future production from the areas of high and moderate potential for both locatable and leasable minerals. This would provide background data on the importance of minerals in the area. **23-1**

Wilderness designation will prohibit exploration for, and production of, minerals, therefore, the value of mineral production that may be foregone is very important. Overlays on the maps of the wilderness study areas (WSA) showing the mineral potential should be prepared and the location of mining claims should be shown. An estimate of the dollar values of locatable and leasable minerals for each WSA should be prepared and included as part of the data used to compare the alternatives and determine the preferred alternative. Without this data, valid comparisons cannot be made between the various resources, and the decision process is thereby flawed. **23-2**

Response Letter 23

23-1 As noted on page 3-15 of the Draft RMP/EIS, the RMP area contains one of the most significant gold belts in the U.S. with over 7,000,000 ounces of reserves valued at $2.45 billion at $350/ounce. The Blackburn oil field has produced about 522,320 barrels of oil having a value of $10.4 million as of December, 1985 (unpublished Nevada Department of Minerals Report). Value of past hardrock mineral production is estimated to be at least equal to the value of the above noted gold reserves, in 1985 dollars.

23-2 Minerals data available is not sufficient to estimate value (if any) of locatable or leasable minerals in the WSAs with an acceptable level of accuracy. No economically minable mineral deposits are known to exist in any of the WSAs.

Comment Letter 23

Elko Resource Area
November 13, 1985
Page Two

23-3 How will the minerals data pertaining to each WSA, prepared by the U.S. Geological Survey and Bureau of Mines during their mineral surveys, be incorporated into this decision document?

MEC opposes the designation of areas with high and moderate mineral potential as wilderness areas. Furthermore, we believe that the Bureau of Land Management has the legal and regulatory tools to protect areas of environmental, wildlife or recreational concerns without withdrawing the areas from mineral activity.

Most of the Rough Hills WSA has moderate mineral potential; therefore, it should not be recommended as suitable for wilderness.

The southern part of the Little Humboldt River WSA has moderate mineral potential and should not be recommended for wilderness.

The Cedar Ridge WSA should not be recommended for wilderness designation because of the high oil and gas potential.

A major portion of the Red Spring WSA has moderate potential for oil and gas production; therefore, the WSA should not be recommended for wilderness designation.

Thank you for the opportunity to comment on this forest plan.

Sincerely,

John D. Wells

John D. Wells

JDW/dlm

Response Letter 23

23-3 The minerals data prepared by the U.S. Geological Survey and the Bureau of Mines will be incorporated into the Secretary's Final Elko Wilderness EIS prior to his filing it with the Environmental Protection Agency and making his recommendation to the President. This information, then, will be available to Congress when it makes its final decision on wilderness.

The proposed Elko RMP and the eventual Record of Decision make no final decision pertaining to the wilderness issue. They portray the Nevada State Director's preliminary recommendations to the Director of the BLM and the Secretary of the Interior as to the suitability for wilderness designation of the four wilderness study areas (WSA). The final decision is not made until Congress either designates the WSAs as wilderness or releases them from wilderness review.

Comment Letter 24

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

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

November 14, 1985

Mr. Rodney Harris
District Manager
Bureau of Land Management
3900 East Idaho Street
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

The Wildlife Management Institute is pleased to comment on DRAFT ELKO RESOURCE AREA MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT.

We prefer Alternative C, the High Amenity Alternative because it provides more wilderness, better diversity, more hunting and angling and more riparian improvement. These are attained largely by reduced livestock grazing. (Page S-8).

No total of wildlife numbers is provided, only AUM. (Page A-39) The proposals would be easier understood if numbers of animals were used. Both Alternative C (Amenity) and D (Preferred) provide only enough habitat to reach "reasonable numbers" of big game. "Reasonably numbers", by agreed definition are the average numbers for the last 15-17 years. Although "reasonable numbers" are more than current population, there is no provision for increasing big game through improved habitat management. That is the flaw in the reasonable numbers concept, which incidently is not applied to livestock numbers which are scheduled to increase 30 percent. The Elko planning unit now contains 20 percent of Nevada's mule deer. Holding this better habitat to produce only a past average population is not acceptable, especially when no such restrictions will be applied to livestock. The heavy subsidy to the livestock permittees is proposed in the preferred alternative. For example:

DEDICATED TO WILDLIFE SINCE 1911

Comment Letter 24

(Page 3-7)	Number of Permittees	99
(Page S-7)	Average Use (AUM)	305,247
(Page S-7)	Proposed Use (AUM	396,989
(Page 3-21)	Capital Value of an AUM	$50
(Page 2-9)	Cost of Proposed Range Improvements calculating:	$4,704,105
	New AUM Created	91,742
	Cost of a New AUM	$51.28
	Capital Value of 91,742 new AUM	$4,587,100
	Average Capital Gain of New AUM's for each permittee	$46,334
	Direct Subsidy per permittee for Range Improvements	$47,516
	Total Subsidy - per permittee	$93,850

The grazing fee is now $1.35 per AUM. Since a new AUM costs $51.28 and 8 percent interest on that AUM is $4.10 per year, the $1.35 fee charged represents a continuing subsidy from the taxpayer to the livestock operator.

These subsidies are for a livestock industry that provides only 3.9 percent of the income and 7.3 percent of the jobs in the country. (Page 3-20).

24-1 The plan, as written, is unsatisfactory until equal treatment and expansion are provided for the habitat that produces one-fifth of Nevada's mule deer. Alternative C is the minimum acceptable for wildlife.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole

Daniel A. Poole
President

DAP:slh

Response Letter

24-1 The Proposed Alternative provides for a doubling of mule deer numbers and increases in sage grouse, other upland game, furbearers and nongame wildlife populations. Under the direction of the Federal Land Policy and Management Act, the Bureau is responsible for a variety of resource values so that they are used in a combination and at levels which will best meet the present and future needs of the American people. After considering the comments throughout the public participation phases, the proposed plan is felt to best meet these needs in a manner which does not cause unnecessary damage to the land, it's resources or it's potential to produce these resources.

Comment Letter 25

Amoco Production Company
Denver Region
1670 Broadway
P.O. Box 800
Denver, Colorado 80201
303-830-4040

Roberta Andersen
Public Lands Coordinator

November 14, 1985

Mr. Tim Hartzell
Elko Resource Area Manager
Bureau of Land Management
P. O. Box 831
Elko, NV 89801

Dear Mr. Hartzell:

Amoco Production Company is a subsidiary of Amoco Corporation. The primary job of its Denver Region is to find and produce oil and gas in the Western United States. Federal ownership and management of the surface and mineral estates throughout so much of the West mandates that our involvement with federal planning be high and continuous. We are pleased to have the opportunity to comment on the draft resource management plan and EIS for the Elko Resource Area.

The draft RMP is thorough and comprehensive. The interdisciplinary team has done a good job of presenting the environmental components in a clear, legible manner; management prescriptions show a good understanding of the need for conflict resolution, or risk management, in ways designed to benefit all who will use the federal lands in the resource area.

Amoco Production Company supports Alternative B. BLM has a wide spectrum of management options and environmental protections which will successfully enable those who produce consumer products from public lands to do so without environmental degradation or detriment to wildlife. It is clear from the plan that proposals for development will be considered case-by-case, with appropriate activity plans and environmental assessments tiered to the RMP/EIS under Alternative B. It is important for publics to understand that there are rigid environmental protection measures imposed on any proposed development, and that many commodity producers have gone out of their way to protect enviromental values before, during, and after development. Too little credit has been given to environmental progress. Selection of Alternative B will prove, once again, that sensible, professional multiple-use management works to the benefit of all who enjoy products and pleasures from public lands.

Comment Letter 25

The special stipulations listed in Appendix 6 should be very carefully imposed and based on the actual presence and activity of named animals. We are willing to work with managing agency personnel to avoid disruption to wildlife species, and appreciate the fact that this area is heavily populated with animals important to a great number of people. The fact that you list these as "special" stipulations shows your willingness to work case-by-case to promote the best overall management scenario.

Overlays on the base map of the land status, wildlife habitat, and mineral potential maps show one graphic example of the extraordinary amount of juggling required of agency managers to achieve resolution of conflicts without infringing on the inalienable rights of other surface owners and valid rights of mineral lessees. Working together is the only chance the public has to assure common-sense management of its public land base.

Again, we appreciate the opportunity to comment.

Sincerely,

R. L. Andersen

RLA:sd

Comment Letter 26

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Edward F. Spang
Nevada State Director
Bureau of Land Management
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Dear Mr. Spang:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled ELKO RESOURCE AREA, RESOURCE MANAGEMENT PLAN, ELKO, LANDER AND EUREKA COUNTIES, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because 1) EPA recommends reevaluation of proposed riparian habitat protection efforts, 2) water quality concerns need to be addressed, 3) air quality issues have not been addressed, 4) herbicide issues have not been addressed, and 5) resource management concerns need to be clarified. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send five copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (4 pages)

Comment Letter 26

-1-

Riparian Habitat Comments

"Aquatic areas and riparian vegetation types constitute less than one percent of the total land area administered within the RMP area, however, they are the most productive in terms of plant and wildlife diversity. They are also areas where competition exists among various resources, including wildlife, mining, and livestock" (p. 1-7).

1. The preferred alternative will only improve 15% of the riparian habitats while allowing 85% to remain unchanged or to decline (p. 4-33). EPA urges BLM to reevaluate this management objective so that more of this valuable resource can be protected. The FEIS should identify those riparian areas where management "techniques proven to be effective in improving and protecting riparian habitat" will be used (pp. 2-33, 2-34). 26-1

2. The FEIS indicates that "livestock grazing was primarily responsible for producing and maintaining deteriorated aquatic/riparian habitat conditions" (p. 3-11). These impacts are related to livestock overuse of streambanks which cause sloughing of the banks, stream turbidity, reduction of streambank vegetation, increases in stream temperature and soil compaction.

   a. Estimates of resource reduction should be considered very carefully when BLM plans mitigation procedures to protect the aquatic and riparian habitats within the resource area. The nature of these impacts should also be considered during the monitoring phase when BLM is evaluating whether or not the grazing allotments can be increased 30% beyond the present levels.

   b. The FEIS should discuss, in greater detail, mitigation measures that will be implemented to restrict "activities affecting riparian areas and erosive soils" (p. 2-27) and those "management actions within floodplains and wetlands (that) will include measures to preserve, protect and if necessary restore their natural functions" (p. 2-35). 26-2

Water Quality Comments

1. The FEIS should discuss the potential "impacts associated with mining, roads, water diversions and channelization (which) were important on some specific stream locations" (p. 3-11). The discussion should include an evaluation of possible mitigation meaures that could be employed to prevent significant deterioration of instream values from mining activities on steep slopes, potential impacts from erodable soils, and water quality impacts from development of oil and gas leases. 26-3 26-4

Response Letter 26

26-1 On page 2-19 of the Draft RMP/EIS, the Short and Long-term Management Actions for riparian habitat management identifies 117 miles of riparian/stream habitat for management and improvement in good habitat condition. The actual locations for management and improvement will be determined at the activity level of planning as stated on page 2-24. See Appendix 4, Table 2 for further information on individual stream conditions.

26-2 Beginning on page 2-33 of the Draft RMP/EIS eight techniques are described that will be used to improve and protect riparian habitat. As stated on page 2-34, the technique or combination of techniques will be determined on a site specific basis.

The measures to be used within floodplains and wetlands as stated on page 2-35, will include a variety of methods. The exact form of protection or restoration will be tailored to the individual situation following more detailed evaluations.

26-3 Impacts associated with these activities regarding soil, streamside vegetation, spring runoff, water turbidty, disolved oxygen, water temperature and water table are similar to those resulting from livestock use discussed on page 3-11 of the Draft RMP/EIS. Changes in sediment loads/yields can be locally significant depending on the size of surface disturbances.

26-4 The measures taken to mitigate impacts from activities, including livestock grazing, will be determined at the time the proposals are being considered.

Site specific evaluations are conducted during the preparation of individual activity plans and the environmental analysis (EA) process. This includes the identification of impacts on watershed, soils and water quality, among others. The mitigation of these impacts is designed specifically for the individual situation. This is in compliance with the Management Actions Common to All Alternatives for minerals, watershed, soil and water, beginning on page 2-34 of the Draft RMP/EIS.

Comment Letter 26

-2-

26-5 a. The discussion of aquatic habitats (p. 3-10) should include a discussion of whether streams in the planning area meet Nevada water quality standards. If violations of water quality parameters occur, the FEIS should discuss probable causes and possible mitigation measures that could be employed for the segments that may be affected.

26-6 b. The FEIS should list the streams that occur in the resource area with information about compliance with water quality standards and abundance of aquatic life. This information would be similar to the data presented in Table 3-2 (p. 3-12) and page 3-26, but the new table would be more site specific for each stream.

c. Possible measures should be discussed which would enable these streams to comply with Nevada water quality standards. EPA recommends that the RMP be modified to prohibit any further degradation of streams that do not meet Nevada water quality standards and, where possible, measures should be implemented to improve the streams.

26-7 2. The FEIS should include a map with the location of all water resources improvements (pp. 2-18, 2-30) and a baseline reference map of the existing water resources in the resource area.

Air Quality Comments

26-8 The FEIS should provide data and evaluate the air quality of the resource area in terms of the National Ambient Air Quality Standards as well as those standards of the State of Nevada (p. 2-35). The statement that "air quality is generally good" (p. 3-27) is not an adequate evaluation of the present air quality of the resource area. For those activities that may affect air quality, the FEIS should discuss the kinds of mitigation that would be used to prevent air quality impacts.

Herbicide Comments

26-9 The RMP is intended to outline management techniques within the resource area, therefore, the FEIS should contain a broad overview of the potential uses of herbicides (pp. 2-18, 2-29, 2-30). The discussion should include the type of herbicide to be used, target species, areas to be treated and potential impacts from the application of the herbicide.

Response Letter 26

26-5 We have initiated the sampling of a limited number of streams in the Elko Resource Area. This preliminary information indicates the potential for localized situations where one or more water quality standards are exceeded. Through our activity planning process any water found to exceed standards will be specifically identified and measures to remedy the situation implemented. This year two activity plans are being initiated for watersheds identified as important for recreation and other uses.

26-6 The Council on Environmental Quality Regulations (40 CFR 1502.15) state that only enough data to understand the effects of the Alternatives should be included in the description of the existing environment. Since a site specific analysis will be conducted where an action is being proposed and the proposed alternative includes compliance with state and Federal water quality standards, a listing of this type will not provide any additional information from which to determine the impacts from actions proposed. Site specific data will be used to analyze and develop activity plans for watershed management. See page 2-35 of the Draft RMP/EIS.

26-7 As identified in Response 26-6, the information presented in an environmental document, such as this should only be that which will aid in the understanding of impacts. The inclusion of this information is not appropriate at this level of environmental analysis. This is supported by the recent court decision (NRDC et al vs. Hodel) where the judge stated "...the level of specificity of the EIS is governed by the proposed action; the EIS is not an administrative blueprint designed to allow the public to second guess every possible future decision that the agency may have to make." Site specific data will be used to analyze and develop activity plans for watershed management. See page 2-35 of the Draft RMP/EIS.

26-8 Since it is inappropriate to evaluate air quality impacts at this level of analysis, they were not discussed in the Draft as stated on page 4-1 of the Draft RMP/EIS. It also states that air quality will be "examined in future environmental assessments..." The discussion of air quality on page 3-27 states that there are no designated nonattainment areas where established state and Federal standards for one or more pollutants have been exceeded.

The measures taken to mitigate impacts to air quality will be determined at the time site specific evaluations are conducted. This is during the preparation of individual activity plans and environmental analysis (as stipulated by NEPA and affirmed in the management guidance made a part of this proposed plan page 2-24 to 2-25 of the Draft RMP/EIS).

26-9 The proposed RMP includes a proposal to treat or seed 120,978 acres or .04 percent of the planning area. The method for this manipulation has not been determined and could include burning and/or spraying. The method will be determined during allotment management planning only if the brush control proposal is carried through to that stage. If spraying is selected, it will be analyzed in detail through the environmental assessment process. This analysis will include type of herbicide, location, acreage, target species, and environmental impacts. Herbicide application will conform to all Federal, state and local regulations.

As a result of a recent court decision, the BLM is developing a worst case analysis prior to using herbicides on public lands.

Comment Letter 26

-3-

Resource Management Comments

The FEIS should:

26-10 1. Disclose criteria used to designate 12,438 acres of the Little Humboldt River WSA as unsuitable in the preferred alternative (pp. S-5, 2-18). The criteria listed under the description for the area were unclear (p. 4-22).

26-11 2. Discuss the impact of vegetation conversion from Pinyon Pine/Juniper areas to grasslands (p. 2-34). The discussion should include the criteria that will be evaluated to determine when an increase in the harvest of woodland products (to 60,000 acres) and an increase of Christmas tree cutting (to 23,000 acres) would be permitted (p. 2-19).

26-12 3. Disclose what monitoring criteria will be used to allow an increase of 30% in the grazing area as discussed in the resource area described in the preferred alternative (pp. S-5, 2-18).

26-13 4. Include a brief discussion of mitigation success for mine site reclamation efforts (p. 3-15).

Response Letter 26

26-10 The criteria utilized to determine the suitability or nonsuitability of all or a portion of a WSA for wilderness designation are set forth in the BLM Wilderness Study Policy dated February 3, 1982. They are also listed on page 1 of the Elko Wilderness Technical Report.

The 12,438 nonsuitable acres are comprised of three separate areas within the WSA. One portion was nonsuitable because its moderate mineral potential outweighed the moderate wilderness values present. Private land boundaries of the suitable portion were also avoided to allow for future recreational access.

Another portion included moderate mineral potential and low quality wilderness values. The suitable boundary was also drawn to avoid adverse impacts to owners of private land and allow for future recreational access.

The third portion contains low quality wilderness values and includes terrain that is easily accessible by motorized vehicles. It was determined nonsuitable to avoid future manageability problems.

26-11 Any impacts that would result from pinyon pine/juniper type conversion would be documented in an environmental analysis of the specific proposal. Activity level planning will include discussion and analysis as specified in the Management Guidance incorporated into the Proposed Plan (page 2-24 and 2-25 of the Draft RMP/EIS).

The criteria used to determine the levels of harvest of woodland products, including firewood and Christmas trees, are specified in the "Public Domain Woodlands Management Policy Statement" of November 19, 1982.

26-12 The Nevada Rangeland Monitoring Handbook and BLM Rangeland Monitoring Technical Report 4400-7 describe the procedures for analyzing monitoring data. Analysis of the monitoring data by district resource specialists results in recommendations for changes in management if objectives are not being met. Copies of these documents are available from this office.

26-13 As noted on page 3-15 of the Draft RMP/EIS about 70 percent of lands distrubed by mining can be reclaimed. Factors which facilitate reclamation include presence of soil, moderate to gentle slopes, and more than 12 inches of precipitation per year. Reclamation is generally not feasible for open pit mines and on very steep slopes.

Comment Letter 26

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

Comment Letter 27

EXXON COMPANY, U.S.A.

December 27, 1985

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

Dear Mr. Hartzell:

Exxon Company, U.S.A. is pleased to have this opportunity to comment on the Draft Resource Management Plan and Environmental Impact Statement for the Elko Resource Area. Exxon has a strong interest in the management direction of federal public lands because many of these areas have potential for hydrocarbon discoveries and production.

Exxon Company, U.S.A. has reviewed the Draft Plan for its range of alternatives and treatment of minerals, especially oil and gas. We found it encouraging that the Bureau recognizes the importance of the hardrock minerals industry to the economy of Nevada, but more significantly, it has provided for future exploration and development opportunities with leasable minerals.

In another example of responsible decision-making, the Bureau has chosen not to recommend the Cedar Ridge and Red Spring wilderness study areas as suitable for designation. We heartily concur with this action because the area has been acknowledged as having high oil and gas potential by the U.S. Geological Survey in Circular 902, entitled, "Petroleum Potential of Wilderness Lands in the Western United States."

Thank you for the opportunity to comment and your consideration of our views. Please feel free to contact Fernando Blackgoat at 303/789-7488 if we can be of further help.

Sincerely,

H. W. Praetorius

FB:mma

c - E. F. Spang, Nevada State BLM Director, Reno, Nevada

A DIVISION OF EXXON CORPORATION

Elko Testimony 1

Lester McKenzie of the Nevada Grazing Board No. 1:

1. "One of the major concerns I have at this point with this document is the adequacy of the field data on which the analysis and alternatives are based. The introduction of chapter four, environmental consequences, starts out with the following sentence: 'This section presents the scientific and analytic basis for the comparison of the alternatives and selection of resource management plan.' Assumption number three on page four - two states: 'Base line data for vegetative conditions and trends and other parameters is the best available. While this data is not used by itself or for making forage allocation decisions, it is useful for the planning and analysis purposes.'".

2. "My problem is if the trend in wildlife habitat conditions and numbers is downward under the existing conditions because the range is going to grass due to better range management, how in the devil are you going to turn this around and double the number of deer by applying the even better management proposed in alternative "D"?"

Response

ELKO

1. See response to comment 13-1

2. The projected change in vegetation over the long-term in Alternative D, as stated on page 4-33 of the Draft RMP/EIS, is "... an overall three percent of the native vegetation on the public lands within the planning area would move toward the potential native community...". The remaining 97 percent will not change. As stated on page 4-31, under WILDLIFE HABITAT, "...the majority of existing habitats would improve one condition class...". The planning area will improve through natural succession, but will also improve through the livestock and wildlife range improvements. See page 2-9 of the Draft RMP/EIS for levels of projected range improvements.

Reno Testimony 1

Winthrop Rowe of the Freeport - McMoRan Company:

1. "And I would say that one of the things that has been grossly overlooked in your studies is interpretative geology which is what explorationists do."

   "And one of the things — one of the big shortcomings of just my quick purusal of this environmental statement is the fact that you did not show mineral trends, and that's one of the earliest stages of projective and interpretative thinking that we use. Now you have shown interpretation of Midas as a potential and so forth, portions of Tuscarora, but you do not show projections of mineral trends which is important."

2. "We just found out about this at about three o'clock this afternoon. Apparently we somehow didn't make it on the mailing list."

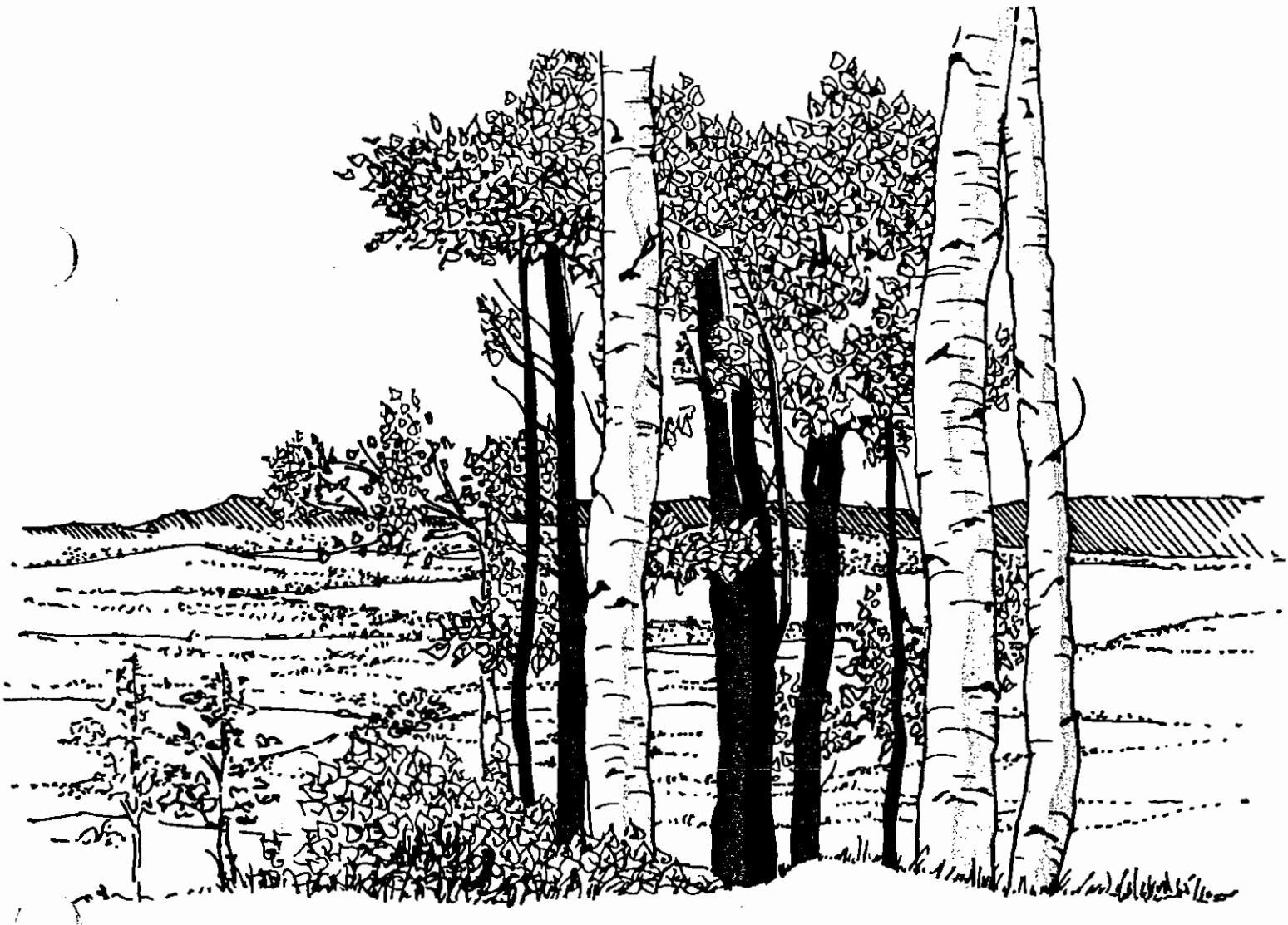
Response

RENO

1. Mineral trends, lineaments, alteration, similarity of the geology to other producing areas, stream sediment and whole rock sampling by Quade and Tingley (1984) and (USDI-BLM, 1983) along with other geologic data formed the basis for rating the mineral potential of each WSA. This information is detailed in the Wilderness Technical Report. It should also be noted that information on the mineral potential of the WSAs was solicited from private industry and that this information was fully considered prior to making wilderness area suitability recommendations.

2. Two addresses representing your company have been retained on the RMP mailing list since the beginning of the planning process. They are: Ms. M.L. Berkbigler, Freeport Exploration Co., P.O. Box 1911, Reno, NV 89505 and Freeport Gold, Environmental Coordinator, 439 W. Commercial Street, Elko, NV 89801. On December 20, 1983 we received comments from your Elko Office and on November 29, 1984 a letter was sent by Ms. Berkbigler. Both of these addresses were sent copies of the Draft RMP/EIS on or about August 10, 1985. We feel your company was adequately notified of our proceedings.

GOVERNOR'S CONSISTENCY REVIEW



STATE OF NEVADA

RICHARD H. BRYAN
Governor

JEAN FO.
Director

OFFICE OF THE GOVERNOR

OFFICE OF COMMUNITY SERVICES

Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

May 12, 1986

Mr. Edward F. Spang
State Director
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520

Re: Governor's Consistency Review -- Elko RMP/FEIS

Dear Mr. Spang:

In reference to the above mentioned plan, we would like to advise you that we are disappointed with the BLM's consideration of our position on wilderness. Clearly, we believe that our analysis and subsequent recommendations for boundary adjustments to the Little Humboldt River Wilderness Study Area (WSA) are not only reasonable but appropriate.

We look forward to a continuing effort in providing meaningful input into each WSA proposed by BLM in Nevada.

Sincerely,

John B. Walker, Chief
Planning and Intergovernmental
Affairs

JBW/ll
cc: Tim Hay, Governor's Office

BLM EK PT 86 10 1792

GPO 687-057/45853