

Form Letter 1

November 29, 2005

BLM Ely Field Office
Attn: Ely RMP Team
HC 33, Box 33500
Ely, Nevada 89301

Dear Ely RMP Team;

Please accept my comments on the draft resource management plan for BLM lands in eastern Nevada.

Form1-1 [Protecting wilderness quality public lands is my primary concern in the draft plan. I urge the BLM to continue to protect and restore the eight areas currently identified as Wilderness Study Areas from damage from illegal off-highway vehicle use and other illegal activities.

Form1-2 [In addition, I ask the BLM to include provisions in the final management plan to protect the wilderness qualities of all of the areas carefully reviewed and recommended by the Nevada Wilderness Coalition for wilderness protection.
These

Form1-3 [special places like Becky Peak, with its high meadows and rich habitat for elk, pronghorn, and other wildlife, are favorites of outdoors enthusiasts. The Antelope Range with its outstanding vistas, wildlife, and opportunities for solitude is equally deserving of protection. In the case of the spectacularly scenic Blue Mass/Kern Mountains, I would like to see the Area of Critical Environmental Concern proposal for this area expanded to include the entire area proposed by the Nevada Wilderness Coalition.

Form1-4 [The Government Peak area, adjacent to the Mt. Moriah Wilderness, should also be protected as wilderness to protect wildlife viewing and hunting opportunities for visitors, as well as habitat for wildlife. The expanded Heusser Mountain Bristlecone Pine area just outside of Ely also needs to be protected.

Form1-5 [All of these wilderness quality areas should be protected in the plan by prohibiting oil and gas leasing and the placement of wind power facilities within their boundaries.

Form1-6 [These potential wilderness areas should be designated as Class 1 Visual Resource Management Units. Off road vehicles should be limited to only designated roads and trails and all unnecessary vehicle routes should be restored.

Form1-7 [In summary, I want to see all of the wilderness quality land managed by the BLM's Ely Field Office protected in the long term for the life of this resource management plan.

Thank you for your consideration.

Sincerely,

Responses to Form Letter 1

Form 1-1 The Lincoln County and White Pine County Conservation, Recreation, and Development Acts have either designated wilderness or released wilderness study areas in these two counties. Designated wilderness and the remaining wilderness study areas in the Nye County portion of the decision area are closed to OHV use. OHV use in other parts of the decision area will be "limited" to designated roads and trails in order to protect a range of resource values.

Form 1-2 When the Ely RMP planning process was initiated, there was no requirement in the Land Use Planning Handbook to identify lands with wilderness characteristics. Under the new Planning Handbook (2005), the BLM no longer designates wilderness study areas as part of the land use planning process. While the new Handbook allows the Ely Field Office to consider information on wilderness characteristics as part of travel management and visual resources management, no lands with wilderness characteristics were identified during the Ely RMP planning process.

Form 1-3 As part of the ACEC regulations, the Ely Field Office may not use an ACEC designation as a substitute for wilderness suitability recommendation.

Form 1-4 Please refer to Response to Comment Form 1-2.

Form 1-5 Please refer to Response to Comment Form 1-2.

Form 1-6 Please refer to Response to Comment Form 1-2.

Form 1-7 Please refer to Response to Comment Form1-2.

Form Letter 2

October 20, 2005

BLM
Ely, Nevada Field Office
Ely, Nevada

Re: BLM Ely RMP/EIS

Dear Sirs:

You have solicited comments from the public; I have the following questions and concerns regarding the proposed RMP/EIS for portions of eastern and central Nevada. As you know, the stated main premise for this effort is an attempt to "restore the Basin's native plant species and halt the spread of invasive species". As that is the main stated premise for the program, I have the following comments and questions:

- Form 2-1 1. Please see exhibit A attached. Are any of the BLM staff responsible for the development and implementation of this RMP currently or in the past members of, employees of, or affiliated with any of these organizations in any way?
- Form 2-2 2. Have any of these organizations or individuals from these organizations been hired, contracted with or allowed to work as volunteers in any capacity that would allow them to influence the RMP/EIS development or implementation?
- Form 2-3 3. Has any information provided by them in the way of statistics, studies either published or unpublished, surveys, or opinions been included in the formulation of this RMP/EIS, in any of the potential implementation formats?
- Form 2-4 4. Have any of the BLM personnel involved in the RMP/EIS met with any person or persons from any of these organizations in a private or non-public meeting concerning the aspects of this program?
- Form 2-5 5. Have any of these organizations been contracted with or in any other way paid to provide any information, surveys, studies or statistics that have been utilized by the BLM staff for this particular RMP/EIS?
- Form 2-6 6. Has the BLM staff complied with the letter and spirit of SB 247 concerning the closure of existing roads, and what is being done to ensure no closures of public access roads and routes currently open?
- Form 2 -7 7. It appears that under the auspices of restoration of native plant and animal species, an attempt is being made by the composers of the plan to include other non-related activities. For example, why does this RMP/EIS even consider road closure and cessation of so called off-road activities? Please explain in detail how the above stated purpose of the RMP/EIS will be met by road closure, cessation of off-road activities, and closure of large areas of the land in question. Please be specific and please be sure to include specific studies and surveys that support that point of view, and where they can be reviewed.
- Form 2-8 8. What measures have been taken to ensure continued Americans with Disabilities Act access to currently accessible areas? It appears that all of the potential choices will negatively impact this situation. While we understand that you are not required to make provision for the handicapped for wilderness areas, which

Responses to Form Letter 2

- Form 2-1 Thank you for your comment. The subject of this comment is beyond the scope of the Ely RMP and does not require further agency response.
- Form 2-2 Please refer to Response to Comment Form 2-1.
- Form 2-3 Please refer to Response to Comment Form 2-1.
- Form 2-4 Please refer to Section 5.1.4 in the Draft RMP and EIS and Proposed RMP and Final EIS for a discussion of informal presentations that were made to organizations during the preparation of the Ely RMP.
- Form 2-5 Please refer to Response to Comment Form 2-1.
- Form 2-6 Please refer to Section 2.4.14.1 in the Proposed RMP and Final EIS for a discussion of how the BLM develops transportation plans and how the process gives the public the opportunity to participate.
- Form 2-7 The Proposed RMP and Final EIS outline the BLM's proposed activities for managing all of the resources and uses for which it has responsibility within the Ely RMP decision area. These responsibilities extend far beyond protection or restoration of plant and animal communities, although those goals are a major part of the proposed program. Management of transportation routes and off-highway vehicle use on the public lands is just one of the factors considered in meeting the goals and objectives identified in the Ely RMP.
- Form 2-8 Thank you for your comment. The subject of this comment is beyond the scope of the Ely RMP. As stated in Section 1.5.1, General Criteria No.1 of the Proposed RMP and Final EIS, the Ely Field Office will comply with all applicable Federal laws, including the Americans with Disabilities Act.

Form Letter 2 Continued

Form 2-8

we believe is basically wrong, the philosophy of the BLM has always been to make provision when possible for handicapped. How specifically will this issue be addressed?

Form 2-9

All of the potential implementation plans have significant problems. The concerns that we have will be significantly alleviated if truthful and complete answers are given.

Thank you,

Dr. Mike Moore Dr. Dave Moore, Dr Gary Moore, Dr. Kevin Moore, Dr. Fred Knight, Dr. S. Chan, Dr. Jeff Henkes, Mr. Mark Moore, Mr. Ryan Moore, Mr. Adam Moore, Mr. Jake Knight, Mr. Derek Knight, Mr. Curtis Knight, Mr. Josh Moore, Mr. Kyle Moore, Mr. Lukas Moore, Mr. Frank Chan, Mr. Vince Lee, Mr. Mark Chan, Mr. Doug West. "The Committee of Twenty"

**C/O Mark Moore
8565 Corbett
Las Vegas, Nevada 89149
702-254-6700
702-596-7622**

Responses to Form Letter 2

Form 2-9 Comment noted. All comments on the Draft RMP and EIS have been truthfully responded to in this section of the Proposed RMP and Final EIS.

Form Letter 3

Snore1600rep@aol.com

Form 3-1
Form 3-2
Form 3-3

The proposed draft of the ely rmp has left out the biggest user, off hwy vehicles .It is amazing that there is no ohv park in this emp draft, with the growth of Nevada and the government land sales ohv areas are lost forever. Now is a great time to get the ohv park going so ohvs can enjoy eastern Nevada for many years to come. In the draft there is a plan to reduce or do away with ooff road racing, limiting or eliminating ohv racing will hurt the local economy's of Lincoln and white pine counties, the largest economic impact to Lincoln County is off road racing. There also needs to be ohv trail connecting Las Vegas to the silver state trail and to the Utah trail system with the Nevada department of parks estimating Nevadan's owning 340,000 ohvs and many out of state users in Nevada it make little sense to reduce the areas that many Nevadan's use their ohvs.

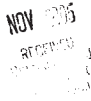
KEN FREEMAN , NATIVE NEVADAN

Responses to Form Letter 3

- Form 3-1 Please refer to Section 2.4.15.1 in the Proposed RMP and Final EIS for a discussion of Special Recreation Management Areas, which include areas where the recreational use of off-highway vehicles would be emphasized. No OHV parks have been included in the Proposed RMP
- Form 3-2 The Proposed RMP and Final EIS identify management actions for off-road racing (see Section 2-4.15.2), but it would not be eliminated.
- Form 3-3 In response to your comment, the text in Section 2.4.15.1 of the Proposed RMP and Final EIS has been revised to clarify the discussion of how future recreational trails would be addressed.

Form Letter 4

November 23, 2005



Gene Drais, RMP Project Manager
Bureau of Land Management
Ely Field Office, HC 33
Box 33500
Ely, Nevada 89310

Re: Comments on BLM's Draft Resource Management Plan/Environmental Impact Statement for the Ely District

Dear Mr. Drais:

As a resident of White Pine County and an avid sportsman I have reviewed the Draft RMP/EIS for the BLM's Ely District and provides the following comments:

General Comment

Form 4-1

The proposed management of elk addressed in the draft contains contradictions and inaccurate information. The draft addresses elk in several sections, some as a non-indigenous species, and some where elk are included as an indigenous species. However, in at least one section of the draft, elk would be granted the same status as other indigenous wildlife. The fact is that very little, or no, research was done to determine if elk were in fact an indigenous wildlife species in the area encompassed by the Ely District. Attached documentation in exhibit form provides evidence that elk are in fact indigenous to Nevada, as well as White Pine County; therefore making it necessary to include elk as an indigenous wildlife species consistently throughout the draft.

Specific Comment

Form 4-2

2.5.6.6 Parameter – Great Basin Big Game Habitat (Mule Deer, Pronghorn, and Elk): The information in paragraph four on Page 2.5.60 under Alternative A, contradicts the information in paragraph two on Page 2.5.61 under Alternative B and in paragraph five on page 2.5-62 under Alternative E. Should either Alternative A or Alternative E be adopted elk would not be granted status as indigenous wildlife; however, in Alternative B elk are more appropriately included as indigenous wildlife.

Form 4-3

Despite the contradiction we maintain that elk are very much indigenous wildlife by definition. There is supporting documentation that elk were very much a part of the native wildlife species in White Pine County. Written documentation in 1859 by Captain J.H. Simpson, Engineer Department of the U. S. Army titled "Explorations" "Great Basin of the Territory of Utah". Captain J. H. Simpson wrote, "An elk was seen yesterday in Stevenson's Canon and one to-day in Red Canon". These sightings were on the northern end of the Snake Range east of Ely. Despite the fact that Capt. Simpson was developing

Responses to Form Letter 4

Form 4-1 In response to your comment, corrections have been made in the Proposed RMP and Final EIS to recognize elk as a native species to the area throughout all alternatives.

Form 4-2 Please refer to Response to Comment Form 4-1 for a discussion of elk as a native species to the area. Text in Chapters 2 and 4 of the Proposed RMP and Final EIS has been revised to indicate that management of habitat for elk under the Proposed RMP would conform to the county elk plans.

Form 4-3 Please refer to Response to Comment Form 4-1 for a discussion of elk as a native species to the area.

Form Letter 4 Continued

Form 4-3 [a direct wagon route from Camp Floyd to Genoa in the Carson Valley in 1859 his observation of elk in White Pine County is documented in the Snake Range. We submit that elk were present in other ranges of White Pine County as early as 1859, if not before. This documentation is proof that elk were indigenous species to White Pine County and therefore granted indigenous species status accordingly. Additional testimony continues to demonstrate that elk are indigenous to Nevada.

Form 4-4 [Statements made referring to the introduction of elk in White Pine County in 1932 are erroneous, when in fact it was a reintroduction of elk in an area in which elk where an indigenous species (native), as documented, almost a century earlier

Form 4-5 [*4.6.1 Aquatic Habitat and Fisheries*
The information contained in paragraph 6 on page 4.6-28 under Alternative E referring to the "reduction in population growth of elk on the District in the long-term" is not consistent with inclusion of elk as an indigenous species as it so deserves based upon above information and attached exhibits which document elk as indigenous wildlife in White Pine County.

Summary

Form 4-6 [We feel that the RMP/EIS should properly address elk as an indigenous (native) species for the purpose of future planning of habitat enhancement projects and just maintain a status equal to that of the mule deer, pronghorn, and big horn sheep. Documentation has been provided to demonstrate that elk were present in White Pine County over a century ago, and due to their reintroduction in 1932 continue to flourish through proper management. I agree that the elk numbers must be managed in relationship to available habitat through harvest, transplant, etc. I personally feel that of the alternatives provide in the draft the only one we could support is Alternative B.

Form 4-7 [Recreation which includes hunting and wildlife viewing contribute a sizable portion to the economy of White Pine County. Not including elk as an indigenous wildlife species and enhancing habitat to maintain or expand heard growth in order to provide recreational opportunities for present and future generations as a part of the BLM's Mission.

Should you have question, please feel free to contact me at (775) 289-4363

Sincerely,



Brandon Jackson

Responses to Form Letter 4

Form 4-4 Please refer to Response to Comment Form 4-1 for a discussion of elk as a native species to the area.

Form 4-5 The current population growth rate of elk in the Ely RMP planning area will logically decrease over time as the population reaches the carrying capacity of available habitat. Text in Chapters 2 and 4 of the Proposed RMP and Final EIS has been revised to indicate that management of habitat for elk under the Proposed RMP would conform to the county elk plans.

Form 4-6 Please refer to Response to Comment Form 4-1 for a discussion of elk as a native species to the area. Your comment regarding a proposed alternative is noted.

Form 4-7 In response to your comment, the text in Section 2.4.6.4 of the Proposed RMP and Final EIS has been revised to clarify the discussion of big game habitat management for increased game species distribution and densities.