

cq@blm.gov

10/25/2010 11:12 AM

To: woinfo@blm.gov  
cc  
Subject: Internet Inquiry

## Responses

Name0 = (0: 'Susan Gunther')  
EmailAddress = (0: 'sgunther1@verizon.net')  
TypeofContact = (0: 'Question/Comment About BLM or its Programs/Services (i.e. maps, land records, mining claims, recreation, permits, oil and gas sales, etc)')  
Message = (0: 'Re: Winnemucca District RMP

I-Gunther-1 | As a concerned citizen, I am writing to urge you to adopt a responsible Resource Management Plan that protects wild horse and burro populations in Nevada's Winnemucca District. Unfortunately, none of the alternatives described in the proposed Winnemucca RMP adequately protect and preserve wild horses and burros.

The policies presented in the proposed RMP do not change the BLM's reliance on mass wild horse roundups and removals to restrict wild horse populations and allow more federally subsidized cattle grazing on public lands. These fiscally irresponsible and inhumane policies have resulted in the stockpiling of approximately 40,000 wild horses in government holding facilities--more than are left free on the range.

A responsible policy must include:

- I-Gunther-2 | - Eliminating livestock grazing within designated wild horse and burro areas;
- I-Gunther-3 | - Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity;
- I-Gunther-4 | - Fairly allocating forage and water resources for wild horses and burros within designated herd management areas;
- I-Gunther-5 | - Increasing appropriate management levels for wild horses and burros based on scientific data;
- I-Gunther-6 | - Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species;
- I-Gunther-7 | - Protecting predators in an effort to restore natural population control mechanisms;
- I-Gunther-8 | - Utilizing PZP fertility control, where necessary, to control wild horse reproduction; and
- I-Gunther-9 | - Supporting public/private partnerships for the creation of wild horse preserves to manage horses on the range without mass removals.
- I-Gunther-10 | Roundups of wild horses and burros should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds keeping family bands intact during relocation. The "zeroing out" of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited.

For all of the above stated reasons, I respectfully submit this comment and urge the BLM to adopt a responsible RMP for the Winnemucca District that protects and preserves America's wild horse and burro populations.

I-Gunther-1: Comment noted.

I-Gunther-2: There are no designated wild horse and burros areas. HMAs are areas where burros and wild horses were found in 1971 that we manage for horses but not exclusively. Alternative C-LG 1—option 2 proposes elimination of livestock grazing throughout the WD.

I-Gunther-3: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock management, up to and including elimination of livestock grazing. The BLM has revisited the WH&B management actions and environmental analysis in the FEIS/RMP.

I-Gunther-4: The amount of forage available to allocate to WH&B shall be determined through in-depth evaluation of resource monitoring data and following a site-specific environmental analysis decision process. Forage for WH&B (AUMs) is allocated based on the AML upper limit.

I-Gunther-5: Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

I-Gunther-6: This is achieved by maintaining herds at AML and through properly managed livestock grazing.

I-Gunther-7: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis. See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.

I-Gunther-8: Alternatives A, B and D allow use of birth control methods for WH&B, including PZP.

I-Gunther-9: Comment noted.

I-Gunther-10: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

I-Harders

Comments

Responses

I am writing to express my concern about your plan for the horses/burros in northwestern Nevada. These horses/burros belong of all of America and they should not be compromised to federally subsidize the cattle ranchers at the taxpayers' expense. I am also concerned about their humane treatment ---any plan to manage the herd size must use fertility control, not helicopter roundups which literally run the horses to death and break up family units. These horses/burros are entitled to well managed lands that provide for their safe and humane existence. Thank you. Faith Harders

I-Harders -1:  
BLM is required to manage WHB according to the WH&B Act and by BLM policy.

I-Harders -1

I-Hardin

Comments

Responses

September 13, 2010

RECEIVED BLM  
WINNEMUCCA NV  
2010 SEP 14 PM 12:38

Winnemucca RMP  
% Bob Edwards  
BLM Winnemucca District Office  
5100 E Winnemucca Blvd  
Winnemucca NV 89445

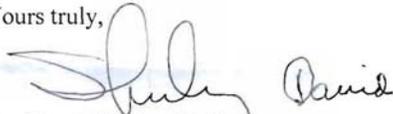
We live in the Humboldt River Ranch and understand that some issues have come up regarding the open range and the cattle that use this sub-division part of the year for grazing.

I-Hardin-1

As far as we are concerned, we have *no problem at all* with the cattle being there. We have *never* seen any damage to our roads caused by the cattle and unless someone can prove that there is damage, we see no reason why we should pay any more than we already pay to have our roads maintained.

Nevada is an open range state and the cattle help with the fire hazard by eating the desert foliage. We realize that there is a certain amount of danger with the cattle being on the roads and with the short days and longer periods of darkness chances of having an accident are always present. Our hope is that this will not be the case for us or anybody else in HRR, but we would like it to be noted that we are in favor of the cattle being able to graze here.

Yours truly,



David and Shirley Hardin  
11500 Beaumont Trail  
Lovelock NV 89419

I-Hardin-1: D-1.3 does not close areas near Humboldt River Ranch to livestock grazing.

I-Hawthorne

Comments

Responses

10/25/2010 15:00 9257430381

THE UPS STORE 0882

PAGE 01/01



Oct 25, 2010

Attn: Bob Edwards, Project Lead for Draft Resource Management Plan

Fax 775 623 1503

Attn Winnemucca RMP

Revisions suggested:

I urge the following tenets to be incorporated into Alternative C2 in the RMP:

- 1. Base AMLs on factual logical principles that provide for genetic viability of the herd. The BLM itself has said a genetic viable herd is 200+, that is without the gender altering and infertility drugs for mares, which studies have shown lead to the decline of the group endangering and extinguishing the group.
- 2. No "zero-ing out" of wild horse or burro herds which is not managing the herds as authored by the law of 1971 and which is not removing the "excess".
- 3. Allocate resources equitably. Ranching sheep and cattle and other commercial uses on public land should not be allocated more resources or given preference over wild horses and burros. Nature and beauty opportunities for observation need to be balanced with profit.

Designate all HMA's to be managed principally for wild horse or burro herds as allowed under 43 C.F.R. 4710.3-2 and decrease or eliminate livestock grazing in HMAs pursuant to 43 C. F.R. 4710.5(a). Use range rotation, re-seeding, and temporary fencing to protect and restore areas when needed to meet rangeland standards.

Tom & Bonnie Lehleiter Hawthorne  
596 Hwy 395 N 48  
Gardnerville Nevada 89410

I-Hawthorne-1 :

Equitable allocations of resources is addressed at D-WH&B 5.7.1

I-Hawthorne -2: Consistent with 43 CFR 4710.3-1, Herd Management Areas (HMAs) shall be established for the maintenance of WH&B herds. In delineating each HMA, the authorized officer shall consider the appropriate management level for the herd, the habitat requirements of the animals, and the relationships with other uses of the public and adjacent private lands, and the constraints contained in § 4710.4.

I-Hawthorne-1

I-Hawthorne -2

I-Hayden

Comments

Responses



**"Kathleen Hayden"**  
**<ksh@znet.com>**  
10/25/2010 02:52 PM

To: <wdrmp@blm.gov>  
cc:  
bcc:  
Subject: Winnemucca RMP public comments

Winnemucca RMP  
c/o Bob Edwards  
Attn: Winnemucca RMP  
Bureau of Land Management  
Winnemucca District Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445  
Fax: (775) 623-1503  
Email: wdrmp@blm.gov

Re: Public comment, input, suggestions and recommendations for the development of Winnemucca RMP.

Dear Sir,

This Winnemucca Field Office as the responsible district for the Calico Complex and many other wild horse and burro use areas in Northern Nevada.

Since this crucial framework will guide BLM in future decisions affecting the area for the next 10-30 years please provide me with prior dated sub committee discussions and recommendations pertaining to free roaming wild horse and burros.

As a citizen particularly involved in preservation of our Western cultural heritage. I hereby submit ideas, comments, input and suggestions for incorporation in the final plan as the number of comments BLM receives.

Submitted also the kinds of recommendations that are critical to the repatriation, rehabilitation and maintenance of free roaming wild horses and burros Herds on historic ranges native herds.

**Winnemucca Draft Resource Management Plan**

I support Alternative C as well as the incorporation of the following recommendations in all Alternatives

I-Hayden	Comments	Responses
I-Hayden-1	<p>and analysis in the Final Environmental Impact Statement and Record of Decision.</p> <p>Include legal land descriptions for all Herd Areas and Herd Management Areas.</p>	<p>I-Hayden-1: The Wild Horse and Burro Act did not specify legal descriptions in the designation of the HMAs and HAs. BLM has furnished maps suitable for an RMP analysis. BLM has furnished maps suitable for an RMP analysis. Several GIS layers are available to the public for downloading at: <a href="http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html">http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html</a></p>
I-Hayden –2	<p>Review all Herd Areas within the planning area for reintroduction to Herd Management Status as required by CFR 4700.3-1. Provide a detailed analysis and reasons for previous withdrawals as well as potential mitigation measures that may reinstate wild populations on legally designated Herd Areas.</p>	
I-Hayden-3	<p>Identify wild horse and burro use areas as suitable for designation as wild horse and burro “ranges” to be devoted principally as sanctuaries for their protection and preservation as per Section 1333(a) of the Wild Free-Roaming Horse and Burro Act and 43 C.F.R 4710.3-2. This may include historic ranching properties that have been acquired by USFS, USFWS, BLM, NPS through conservancy transactions.</p>	<p>I-Hayden-2: All the HAs contain checkerboard land and therefore the wild horses were removed. Creating a management action, as the author suggests, of reintroducing wild horses to the HAs would create an increased population of wild horses on private lands. This could create an unmanageable situation which would require the BLM to continually and frequently remove horses from private lands.</p>
I-Hayden –4	<p>Develop Alternatives that incorporate the designation of ACECs (Areas of Critical Environmental Concern) for all remaining wild burro herds and the critical habitat and resources necessary and imperative to insure self-sustaining genetically viable populations within the planning area as per FLMPA, Section 202 [43 U.S.C. 1712] (a)(3) for long-term sustainability.</p>	<p>I-Hayden-3 : No ranges were nominated or identified for designation through public scoping, the RAC subgroup or cooperators. The Winnemucca District currently provides information in recreation guides as to viewing areas for wild horses and burros.</p>
I-Hayden-5	<p>Identify Herd Areas, Herd Management Areas and Ranges that provide unique opportunities to develop public viewing opportunities and/or development of ecotourism based on the promotion of free roaming wild herds as well as including an analysis of potential economic benefits this would bring to local communities. For instance, contracting locally for hay or water for to sustain herds in emergency situations that threaten their removal.</p>	<p>I-Hayden-4 : Comment noted.</p>
I-Hayden –6	<p>Identify any bands or herds that use two or more Herd Management Areas to secure suitable yearlong habitat and resources based on environmental conditions, migratory patterns or seasonal movement.</p>	<p>I-Hayden-5: This action is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.</p>
I-Hayden-7	<p>Base wild horse and burro resource allocations on scientific and rational principles of BMPs. Incorporate suitability criteria be established within the framework of the RMP as recommended by the National Academy of Science over 30 years ago to better reflect actual use and available forage for free-roaming populations to achieve accurate appropriate management levels.</p>	<p>I-Hayden-6 –See response I-Hayden-1.</p> <p>I-Hayden-7 : See response I-Hayden-1.</p>
I-Hayden-8	<p>Develop and incorporate within the framework of the RMP the methodology used to distinguish wild horse and burro impacts from livestock and other rangeland users. One potential method is to mandate monitoring and utilization levels be measured prior to the introduction of livestock in a given area order to distinguish class use and impacts.</p>	<p>I-Hayden-8 : The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse &amp; Burro Act established HMAs and provided protection for WH&amp;B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&amp;B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock grazing, up to and including elimination of livestock grazing.</p>
I-Hayden –9	<p>In all Herd Management Areas, assure management plans will provide allocations and resources adequate to maintain a minimum of 150 animals at all times on the range per individual HMA as necessary to maintain long-term genetic viability according to the best available science. This will prevent inbreeding or population crashes as required by CFR 4700.0-6(a) and to ensure that populations are being managed as an integral part of the natural systems of the public lands.</p>	<p>I-Hayden-9 : Comment noted.</p>
I-Hayden –10	<p>In individual Herd Management Areas, prohibit management plans and strategies that fail to provide for self-sustaining wild horse and burro populations lower than a minimum population of 150 animals based on the concept of “genetic interchange” between bands or herds from different Herd Management Areas. The only exception to this could be if BLM can conclusively document known population interchanges by photographs or other identifiable markings of animals on a multiple and consistent long-term basis.</p>	<p>I-Hayden-10 : See response I-Hayden-1.</p>

I-Hayden	Comments	Responses
I-Hayden-11	<p>If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury, invoke BLMs authority to reduce or close areas of public lands to grazing use by all or a particular kind of livestock as established by C.F.R. 4710.5 (a), with the goal of maintaining self-sustaining genetically viable wild horse and burro populations through allocations assuring resources are adequate to maintain a minimum of 150 animals at all times on the range per individual HMA.</p>	I-Hayden-11: See response I-Hayden-5.
I-Hayden –12	<p>Prohibit the use of “blanket” management options that allow for wild horse and burro reductions without supporting data to make excess determinations, i.e., “In the absence of species specific data, equitable reductions in livestock and wild horse and/or burros authorizations will be implemented.” The historical problem with the management approach of authorizing “equitable reductions” is there is no accountability or consequence to BLM if they fail to reduce the livestock portion of the projected reductions. Traditionally, BLM has removed wild horses and/or burros or reduced their population objectives while making no changes or increasing livestock authorizations shortly after applying changes exclusively to free-roaming populations.</p>	I-Hayden-12 Specific allotment and HMA AUM allocation decisions are addressed at the site specific or allotment level.
I-Hayden –13	<p>Prohibit the issuance of non-renewable grazing permits in any wild horse and burro Herd Area, Herd Management Area or Range in order to allow maximum long-term rangeland health due to year long grazing pressure in these designated areas. Repatriate herds to retired allotments or those allotments acquired by conservancies and other state or federal agencies when there is data, including fossil evidence, indicating said herds occupied the heritage landscape.</p>	I-Hayden-13 Comment noted and is reflected in FEIS.
I-Hayden-14	<p>Establish criteria within the RMP framework for incorporating periodic monitoring at “key” times to establish data on available water. This should include mandatory flow rates, water quality data, status of historic sources (in order to collect trend data on water availability) and photographic evidence to establish credibility in BLMs data.</p>	I-Hayden-14: See response I-Hayden-5.
I-Hayden –15	<p>Develop new water sources when old sources dry up. Various related multiple use decisions issued by the Winnemucca Field Office as well as surrounding areas indicate the potential for significant and cumulative impacts to underground aquifers and water sources due to draw down. Incorporate provisions within the RMP that provide mitigation measures for water loss, increase available habitat, disperse consolidated grazing pressures, and insure supplemental low cost water sources are available in times of drought or harsh environmental conditions for wild horses and burros as well as other wildlife species within the planning area.</p>	I-Hayden-15: See Objective D-WR2. See response I-Hayden-5.
I-Hayden-16	<p>Prohibit the use of any sterilization measures on populations that fall below the minimum genetic threshold of 150 animals or less and assure balanced gender structures to preserve natural herd behaviors and social dynamics.</p>	I-Hayden-16 -Comment noted.
I-Hayden-17	<p>Prohibit the inclusion of foals one year and under in population inventories and calculations occurring on the range for “excess” population determinations.</p>	I-Hayden-17 : Comment noted.
I-Hayden-18	<p>Establish population objectives and thresholds for big game species within the planning area to insure habitats support a “thriving natural ecological balance” between all species. The current policy to omit critical information on species populations, increased pressure on resource requirements and their resulting impacts fails to conform to federal law mandating scientifically sound management decisions and quality data to determine suitable habitat for all rangeland users. As public stewards, BLM needs to</p>	I-Hayden-18 : Comment noted.

I-Hayden	Comments	Responses
	recognize and honor their position to preserve and protect all resources for the American people, both now and for future generations. State wildlife agencies have a vested interest in increasing big game populations to increase revenue. As such, studies, data, recommendations and management objectives may contain inherent "conflicts of interest" and biased towards the balanced management of resources on public lands.	I-Hayden-19 : Comment noted.
I-Hayden-19	Provide for public review a detailed examination and analysis of all current multiple use and endangered species, or species of special interest, applications within each Herd Area and Herd Management Area within the planning area. This is to include current livestock authorizations, the percentage each allotment overlaps existing wild horse and burro areas as well as maps clearly showing the relationship and resource allocations between livestock and wild equids within the planning area. The purpose of this information is to help the public be reasonably informed as to BLMs compliance with the Act's mandate to accomplish the protection of wild free-roaming horses and burros through their consideration as an integral part of the natural system of the public lands as well as their relationships with other uses of the public and adjacent private lands as outlined in CFR 4710.3.	I-Hayden-20 : Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis . See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.
I-Hayden -20	With respect to wildlife impacts to critical resources required by wild horse and burro populations, provide current estimated big game populations such as elk, pronghorn, mule deer and bighorn, populations affecting the wild horse and burro areas within the planning district, reasonably foreseeable future big game population objectives for these same areas that may impact management strategies to maintain self-sustaining genetically viable herds.	I-Hayden-21: See response I-Hayden-5. All Renewable Energy Plans of Developments are required to be reviewed under NEPA.
I-Hayden -21	All other multiple use authorizations within Herd Areas and Herd Management Areas such as current mining, oil and gas operations as well as renewable resource projects such as solar, wind or geothermal impacting or reasonably projected to impact habitat and/or resources in the Winnemucca Herd Areas and Herd Management Areas as well as projects or proposals that can be expected to be implemented in the reasonably foreseeable future. This should include a detailed map of each Herd Area and Herd Management Area in the planning area to allow the interested public to assess the impacts of other multiple uses to wild horse and burro habitat and populations in a site-specific manner.	BLM has furnished maps suitable for an RMP analysis. Several GIS layers are available to the public for downloading at: <a href="http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html">http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html</a>
I-Hayden -22	Include detailed analysis of the miles, kinds and locations of fencing within each HA/HMA within the planning district. Reaffirm strict limitations on fencing in wild horse and burro Herd Areas, Herd Management Areas or Ranges in order to preserve their free-roaming behaviors and to prevent entrapment, injury, death or undue degradation of resources due to limitations on seasonal or migratory movement. The exception to this would be water and feed capture corrals for oversight, evaluation, and emergency purposes.	I-Hayden-22 : WH&B management with respect to fencing is addressed in WHB 2.
I-Hayden -23	Incorporate protections for predators in and around herd management areas as a management tool for low cost population control and to support the "thriving natural ecological balance".	I-Hayden-23 : Management of wildlife including predators is done by the Nevada Department of Wildlife.
I-Hayden -24	Prohibit management strategies that are based on "adoption criteria" as the primary consideration. This policy fails to conform to both the intent and the mandates of the Act.	I-Hayden-24 : Comment noted.
I-Hayden -25	Incorporate BMPs strategies that rehab forage while conserving historical herd traits on local cultural community landscapes for the bands/herds.	I-Hayden-25: Comment noted.
I-Hayden -26	Review and reinventory herd areas to include historic migratory habitats for Herds who traditionally exceed the borders of Herd Management Areas (HMAs), instead of removing them.	I-Hayden-26: Comment noted.

I-Hayden

**Comments****Responses**

I-Hayden –27

Provide data to determine which animal is excessive to the herd and how it would not contribute to the genetic viability before removal from the public domain.

I-Hayden-27 :  
Comment noted.

**National Historic Preservation Act Sec 106 Compliance**

When any situation that threatens a herd for which a historic argument can be made the federal land managing agency must consider (1) the herd's landscape, including the herd, is eligible for the National Register; (2) therefore the land managing agency has to comply with Section 106; and (3) Notification to myself and other advocate groups to be a consulting party in the Section 106 review process

I-Hayden –28

Where a herd is regarded by people as having significance in an area's cultural traditions and history, that area is eligible for the National Register of Historic Places and require the federal land management agency to consider preservation alternatives, in consultation with concerned parties.

I-Hayden-28  
No living being can be considered for listing on the National Register of Historic Places (NRHP) pursuant to the National Historic Preservation Act. The NRHP only applies to historic properties.

For example, if documents relating to historic site "X" include the mention of free-roaming horses and the present herd of free-roaming horses could be reasonably linked to the historic site, the horses would qualify for consideration under Section 106. Documents are one source of evidence. Oral historical accounts are another. The herds don't have to be linked to a particular site that's been found to be historic; the herds themselves may help give historic significance to the landscape in which they roam or roamed. Two courses of action are suggested. The first involves identifying sites that appear in the National Register that can be found on HMAs and determining if the origins of the present horses could be linked to those sites. The second is to identify obvious unregistered historic sites found on public lands and motivate local historical societies to file the paperwork necessary to get these sites included on the registry.

It's the federal agency's responsibility to comply with Section 106, including determining what's historic about an area. Members of the public shouldn't have to pay to get the studies done.

Thank you for inclusion of these comments into the public record

Sincerely,

Kathleen Hayden

POB 64

I-Hill

Comments

Responses



Barbara Hill  
<barbarhill54@gmail.com>  
10/21/2010 05:07 PM

To: wdrmp@blm.gov  
cc:  
bcc:  
Subject: Winnemucca RMP

October 21, 2010

Bob Edwards, Winnemucca District Office

Bureau of Land Management

5100 East Winnemucca Blvd., Winnemucca NV 89445-2921

[wdrmp@blm.gov](mailto:wdrmp@blm.gov)

Dear Mr. Edwards,  
I am writing to urge the Bureau of Land Management (BLM) to adopt a responsible Resource Management Plan that protects wild horse and burro populations in Nevada's Winnemucca District. Unfortunately, none of the alternatives described in the proposed Winnemucca RMP adequately protect and preserve wild horses and burros.

The policies presented in the proposed RMP do not change the BLM's reliance on mass wild horse roundups and removals to restrict wild horse populations and allow more federally subsidized cattle grazing on public lands. These fiscally irresponsible and inhumane policies have resulted in the stockpiling of approximately 40,000 wild horses in government holding facilities--more than are left free on the range.

A responsible policy must include:

- I-Hill -2 | - Eliminating livestock grazing within designated wild horse and burro areas;
- I-Hill -3 | - Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity;
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- I-Hill -6 | - Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species;
- I-Hill -7 | - Protecting predators in an effort to restore natural population control mechanisms;

I-Hill-1: Comment noted.

I-Hill-2: There are no designated wild horse and burros areas. HMAs are areas where burros and wild horses were found in 1971 that we manage for horses but not exclusively. Alternative C-LG 1—option 2 proposes elimination of livestock grazing throughout the WD.

I-Hill-3: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock management, up to and including elimination of livestock grazing. The BLM has revisited the WH&B management actions and environmental analysis in the FEIS/RMP.

I-Hill-4: The amount of forage available to allocate to WH&B shall be determined through in-depth evaluation of resource monitoring data and following a site-specific environmental analysis decision process. Forage for WH&B (AUMs) is allocated based on the AML upper limit.

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**Comments**

- I-Hill –8 | - Utilizing PZP fertility control, where necessary, to control wild horse reproduction; and
- I-Hill –9 | - Supporting public/private partnerships for the creation of wild horse preserves to manage horses on the range without mass removals.
- I-Hill –10 | Roundups of wild horses and burros should only be conducted in verifiable emergency situations . If necessary, roundups must be conducted with respect for the social integrity of wild horse herds keeping family bands intact during relocation. The "zeroing out" of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited.
- Sincerely,
- Barbara Hill  
58 Bessie Street  
San Francisco, CA 94110

**Responses**

- I-Hill –8: Alternatives A, B, and D allow for birth control methods for WH&B, including PZP.
- I-Hill –9: Comment noted.
- I-Hill –10: Habitat for WH&B is composed of four essential components: forage, water, cover, and space. These components must be present within the HMA in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long term. If they are not present in sufficient amounts, the authorized officer should consider amending or revising the LUP to remove the area's designation as an HMA. If the decision is made to return a designated HMA to HA status, the total population of WH&B should then be gathered and removed. See BLM Manual Section 4710.3.

I-Hill

## Comments

Responses

"Gerry Hill" &lt;ghill1@bxtreme.org&gt;

09/26/2010 12:27 AM

To &lt;svfoweb@nv.blm.gov&gt;

cc "Florence Brady" &lt;fhbrady@jps.net&gt;

Subject: draft comments

Sirs,

Please excuse my tardiness. I've just finished a fourteen hour shift on an excavator and have been busy at it all week (removing orchards).

My name is Gerald Hill, Jr. and I am the field trip leader for the Sutter Buttes Gem and Mineral Society. I am also a director serving our thirteen Northern California rock and gem club field trip Co-op.

For the last few years my wife and I have led several field trips into your region. Locations like Jack Pot (Texas Springs), Fernley, McDermit, and the rhyolite area outside Fallon, are just a few to mention. On our own we have made many visits to Ely, Gabbs, and areas around Carlin, NV. In a few weeks we plan to lead yet another trip to Fernley, NV. and will stay at Dayton State Park.

As a general rule our field trips tend to be small in number (but quality). We are casual collectors and try to be judicious in what we select. Our impact therefore is negligible. It probably goes without saying that we would like to continue this fine tradition. Nevada has afforded me the opportunity to introduce many of our collectors, open spaces, fantastic scenery, and a wide array of gem materials.

If I had a vision for your district it would be to try and maintain as much as possible a multiple-use classification for public lands- as opposed to a special interest group tying land up for their particular genre of appreciation. We all can enjoy Nevada's public lands and when we do make a contribution to Nevada's economy. After a hard days searching at Texas Springs for instance, it sure feels good to wolf down a meal at the buffet in Jack Pot!

I'll be right up front with you. While I lead field trips my heart is in the outback. Nevada's solitude and the freedom to roam really moves me in way that I cannot adequately express but I suspect you too share these emotions. This is common with most rockhounds. The more remote the better. My hope is that this way of life will continue for generations to come. I'll do my part in helping young persons learn about rocks and minerals. Will you do yours and keep Nevada free?

In closing I have something of interest to share with you. The region of California that I am from has an inter-twined history with that of Nevada! Many years ago the San Juan Rifles (changed to North San Juan), an informal militia, hastily gathered guns, powder, bullets, and provisions from the townsfolk. In about an hour they were fully equipped and headed to meet up with the regular militia traveling from Sacramento. They would deal with Indians that had ambushed a wagon train in Nevada. What amazes me is just how fast men were willing to risk their very lives to defend a group of would be settlers they had never met.

A few years later a group of men and women met at Nevada (later changed to Nevada City) to discuss rumors of silver existing in what would become the state of Nevada. These wealthy individuals had made their fortune from gold mines in California and would put up venture capital for what would become the Comstock.

But the most intriguing stories of all is that of a young adventurer who came to California to make his fortune in the gold mines. He would begin at Moores Flat (Grass Valley area). After a few years of mining this man would return to attend Catholic Seminary. Of course by now you are on to me. He would indeed be given a pastorate at none other than Virginia City. We know him as Bishop Manogue (who later established the cathedral in Sacramento).

Please feel free to contact me if you have any questions about rockhounding in your district. I will do whatever I can to assist you and if I do not know the answer I will try to put you in contact with someone who can.

Sincerely,

Gerald Hill, Jr.

I-Hill-1

I-Hill-1:  
FLPMA directs BLM as a multiple use agency.

I-Horn

Comments

Responses

Under Horn <idhorn3@elima.com>

10/25/2010 05:38 PM

To: "Robert Edwards" <Robert\_Edwards@blm.gov>

cc: wfoweb@blm.gov

Subject: Draft Winnemucca Resource Management Plan Comments

October 25, 2010

Department of Interior  
 Bureau of Land Management  
 Winnemucca District Office  
 5100 East Winnemucca Blvd.  
 Winnemucca, Nevada 89445-2921  
 Attn: Mr. Robert Edwards  
[Robert\\_Edwards@blm.gov](mailto:Robert_Edwards@blm.gov)  
[wfoweb@blm.gov](mailto:wfoweb@blm.gov)

Dear Mr. Edwards,

Thank you for the opportunity to comment on the draft Winnemucca Resource Management Plan.

I am very concerned about how this plan will impact wild horses and burros in your area. I do not find any of the proposed alternatives totally acceptable, since they fail to properly protect and preserve these animals.

For decades the BLM has allowed herds to build up over four to five years, then conducted mass removals because "it's raining wild horses". In other words, the BLM has perpetuated its own crisis, not only in Nevada, but wherever "management" was supposed to have taken place.

The BLM has admitted the Wild Horse & Burro Program needs a new direction. Winnemucca has a unique opportunity to lead the way by managing the herds as "an INTEGRAL part of the natural system". To my knowledge, this language has never been removed from The Wild Free Roaming Horses and Burros Act.

According to agency figures, we will soon have more (40,000) wild horses and burros in holding than on the range (33,000). The BLM's stated goal is to have about 26,000 head on the Herd Management Areas by 2013. I don't know exactly how many animals will be removed from your area to achieve this number, but I imagine it will be hundred, if not thousands.

People talk about how much this is costing the taxpayer and I agree. I'm a horse lover, both wild and domestic, so I don't mind my tax dollars going to keep horses and burros that have already been removed alive. What I do mind and strongly object to is spending more tax dollars on roundups when there are better, more humane, and less costly options.

The RMP Alternative C2 seems closest to what I find acceptable. Please include the following:

Manage wild horse or burro herds "principally" for these animals. This would not exclude other uses, but they should be kept to an absolute minimum on the HMAs.

Appropriate Management Levels for all grazing and browsing wildlife on the HMAs. If there are census numbers, please provide them. If not, a census should be done. How can anyone compare impacts to the range without complete information?

I-Horn-1

I-Horn-1: BLM manages WH&B in accordance with the Wild Horse and Burro Act and applicable BLM policy.

I-Horn-2

I-Horn-2: Wild horses and burros are managed according to the Wild Horse and Burro Act. Action D-WH&B 5.6 balances habitat and multiple uses. Objective D-WH&B and Actions D-WH&B 2.1 and D-WH&B 2.2 addresses free-roaming nature of WH&Bs. The Nevada Department of Wildlife manages wildlife populations including predators. Lands proposed suitable for disposal and retention are identified in D-LR 3.1. All lands must meet requirements of FLPLMA before disposing.

I-Horn	Comments	Responses
I-Horn –2 Cont-d.	<p>Reduce or retire livestock grazing on legally-designated wild horse and burro Herd Management Areas.</p> <p>Balance resources fairly. The HMAs were still set aside "principally" for the wild horses and burros. This language is still included in The Wild Free Roaming Horses and Burros Act. "Principally" means "of the first order". If the BLM is not willing to place the needs of these animals first, they should at least consider their needs in a manner equal to the combination of other uses.</p> <p>Make sure HMA waters are free-running, protected from pollution and developed to the fullest degree. No living thing can survive without clean water. Encourage BLM purchase of any and all available Water Rights, and retention of Rights they already own or are entitled to.</p> <p>Keep human activities such as extraction, energy plants, off-road vehicles, unnecessary "scientific studies" and other intrusions to an absolute minimum on the HMAs.</p> <p>Maintain scientifically-based genetic viability on individual HMAs. not on "complexes", which distorts numbers.</p> <p>Use fertility control to control the wild horse numbers only when and where absolutely necessary, and check those herds on a regular basis. Monitor the results of the procedures to make sure they haven't done more harm than good.</p> <p>Don't "zero out" more wild horse or burro herds. If there is a fire or other natural emergency, remove the wild horses and burros to a portion of the range or to another area that keeps them out of danger. Then restore the land, and return the animals as soon as conditions permit.</p> <p>Investigate areas which have already been "zeroed out" for the possibility that conditions may have changed to the point that wild horses and burros can be returned to those lands.</p> <p>Find a way to prevent wild horses and burros from moving outside the HMAs. The BLM employs a lot of range-savvy people who should be able to come up with some solutions other than complete removals.</p> <p>Stop removing so many predators from the range. They are Nature's way of controlling all wild animal populations. Killing more will only lead to escalations in human intervention.</p> <p>Get the public involved in a meaningful and potentially profitable way. Wild horse and burro activities could provide many opportunities for local people.</p> <p>This is a bit off-topic, but still worries me. I understand that land swaps or sales to expand communities and provide for public services are important, but so much of our beautiful country is going under the gavel. Please convince the BLM to stop selling public lands in your area to private corporations and foreign interests. This land may be profitable for them in the short-term, but this is our country, and we're here for the long-term. If absolutely necessary, lease the land and make sure the corporations restore it once they've taken what they came for.</p> <p>I want there to still be stunning landscapes and wildlife – including wild horses and burros – for my children, grandchildren, and all future generations to enjoy when they visit Northeast Nevada.</p> <p>If possible, please let me know you have received my comments by sending an email to the address provided below.</p>	

I-Horn

**Comments**

**Responses**

Thank you for your time and consideration.

Sincerely,

Linda Horn

3600 N. Coronado Ave.

Farmington, NM 87401-4121

1-505-325-2993

lckhorn3@sisna.com

I-Houston

## Comments

## Responses

September 16, 2010

RECEIVED BLM  
WINNEMUCCA NV  
2010 SEP 20 PM 2: 36

Winnemucca RMP  
C/o Bob Edwards  
BLM Winnemucca District Office  
5100 E. Winnemucca Blvd  
Winnemucca, NV 89445

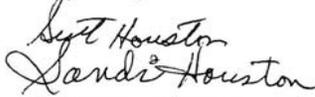
Dear Mr. Edwards,

We are writing to you to give you our comments on the draft of the Resource Management Plan. We are homeowners residing in the Humboldt River Ranch Subdivision. We have been trying to get cattle grazing removed within the subdivision for quite some time. There are over 2000 lots within the subdivision and having the cattle grazing here has caused considerable damage to our privately owned roads (approximately 50 miles). This causes us to pay higher assessments to pay for the repair of them.

The cattle also are a safety issue as they tend to roam on the roads which makes it doubly dangerous in the dark. We have had first hand experience of a cow running across the road in front of our vehicle which resulted in our van being totaled and the cow put down. The insurance company said if we had had a smaller car rather than the van, the cow would have come right through the windshield. The cattle congregate around the road at the Rye Patch Truck Stop, which also causes a potential hazard to people coming off the freeway to get gas. Two years ago a dead cow lay next to the road on Old Victory Highway. Even though the rancher was called to make him aware of the dead cow, it was never picked up but left to lay there and rot.

We are in favor of the alternative in the plan "Action D-LG 1.3. We know the ranchers need to have land to graze their cattle but we feel there are plenty of other places then in the middle of such a large subdivision. We hope that you will take our health and safety concerns in to account when you make your decision.

Respectfully



Scott &amp; Sandi Houston

I-Houston-1:

BLM provided a range of alternatives that close areas to livestock grazing—see LG 1.3.

I-Houston-1

I-Hummel

Comments

Responses



For the BLM to formally consider your comments regarding the Draft Resource Management Plan / Environmental Impact Statement (Draft RMP/EIS), written comments are required. To assure consideration you should provide your comments by September 25, 2010. Please fax this completed form to (775) 623-1503 or mail it to the following address:

Winnemucca District RMP Comments
c/o Bob Edwards
Bureau of Land Management
Winnemucca District Office
5100 E. Winnemucca Blvd.
Winnemucca, NV 89445

2010 SEP 20 PM 2:28
RECEIVED BLM
WINNEMUCCA NV

You may e-mail comments to wdrmp@blm.gov or complete an online comment form at http://www.blm.gov/nv/st/en/fo/wfo/blm\_information/rmp.html. In order to continue receiving information and future mailings about the Winnemucca District RMP, you must ask to be added to the official RMP mailing list by submitting this form by September 25, 2010.

\* Denotes required fields.

Your Name\* Andrew Hummel Today's Date\* 10/17/2010

Please indicate your affiliation by checking one of the following boxes:

[x] Private Individual (no affiliation)

Confidentiality Request:

Please indicate if you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act. This request does not preclude the need to complete the required information below.

A request for confidentiality will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

No selection indicates you do not wish to withhold your information.

- [ ] Please withhold my name only. [x] Please withhold my address only. [ ] Please withhold my name and address.

- [ ] Private Industry [ ] Citizen's Group
[ ] Elected Representative [ ] Federal, state, tribal, or local government
[ ] Regulatory Agency

Name of company, group, government, agency or organization (if applicable)

Mailing Address\*

City\* State\* Zip Code\*

Telephone (optional) E-mail Address (optional) andy.hummel@hotmail.com

Would you like to be added to or remain on the WDO RMP/EIS mailing list to receive future project-related information?

Yes [x] No [ ]

Continued on next page >>>

I-Hummel

Comments

Responses

Please mark the appropriate category and write your comments in the space provided below. Feel free to attach additional pages if necessary.

- |  |   |
|--|---|
| <input type="checkbox"/> Access/Transportation   | <input checked="" type="checkbox"/> Recreation/OHV (Hunting, Fishing, Hiking, Biking, etc.)         |
| <input type="checkbox"/> Energy (Wind, Geothermal, Solar, etc.)                            | <input type="checkbox"/> Social/Economic Concerns   |
| <input type="checkbox"/> Fire Management   | <input type="checkbox"/> Vegetation/Noxious Weeds   |
| <input type="checkbox"/> Historic, Cultural & Paleontologic Resources / Traditional Values | <input type="checkbox"/> Wild Horses & Burros   |
| <input type="checkbox"/> Land Tenure (Retention/Acquisition/Disposal)                      | <input checked="" type="checkbox"/> Wilderness, Wilderness Study Areas & Other Special Designations |
| <input checked="" type="checkbox"/> Livestock Grazing                                      | <input type="checkbox"/> Wildlife/Sensitive Species   |
| <input checked="" type="checkbox"/> Minerals (Hardrock, Oil & Gas)                         | <input type="checkbox"/> Other Concerns (please define)   |
| <input type="checkbox"/> Planning/RMP Process  |   |
| <input type="checkbox"/> Soil / Water / Air / Visual Resources                             |   |

My comments and concerns in reviewing the draft document are primarily in relation to the recommended closure of approximately 95% of the subject area to cross-country OHV travel. Although I support the use of trails and using our resources properly, this closure would, in essence, close a large portion of the area to access and create wilderness area through back door methods.

I am aware (and supportive) of recent campaigns by the BLM (namely nevada-ohv.org and related media advertisements) to promote the proper use of trails by OHV's and limiting cross-country travel as appropriate. However I find no mention on nevada-ohv.org (or in the advertisements) of this proposed RMP and the massive consequences it carries to OHV travel in regards to recreational, hunting, livestock grazing, and mining exploration uses. One would think that if the BLM is proposing such a massive policy change such as this that it would be prominently displayed on such a site as nevada-ohv.org, unless perhaps this change is something the BLM doesn't want noticed? Furthermore, in an era of reduced government budgets and spending, how will the greatly increased enforcement, trail marking, mapping, and maintenance be funded?

In reviewing the document, I also noticed a few discrepancies that are in conflict with the proposed recommended Alternative D. Section 2.4, page 2-7, 2nd paragraph reads "In addition, resource conditions do not warrant planning area wide prohibition of any particular use." Furthermore, same section, 3rd paragraph "Suggestions to designate all areas on public lands as entirely open for yearlong OHV use without regard to current travel restrictions or to entirely close lands to OHV use were considered but dismissed. BLM policy requires public land management to include restrictions to address travel concerns and recreation demands but also to protect resource values." Recommended Alternative D is in conflict with both of these statements, as closing 95% of the land to OHV access is in effect entirely closing lands, to a single particular use, in areas where roads and trails are not prevalent.

Alternative D (page 2-10) states "livestock grazing and minerals production would be maintained on public lands through specific actions to meet resource goals and protect ecosystem health", however again limiting OHV access will limit both of these. This also has the potential to limit maintenance and development of water sources by private parties (typically ranchers) within public lands, which wildlife also rely on.

I believe that further review of the recommended Alternative D is required. I do agree that in areas of sensitive habitat or overuse that closures to OHV traffic (or limiting traffic to established trails) is an appropriate management measure. My recommendation would be to continue the promotion of trail use as a part of Alternative D, and provide a mechanism for travel restrictions / area closure for restoration / protection as deemed necessary in the future.

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the Winnemucca District Office, 5100 E. Winnemucca Blvd, Winnemucca, NV 89445, during regular business hours (8:00 AM to 4:00 PM), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your written comments. Such requests will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

I-Hummel-1:  
A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the Record of Decision for the RMP is signed. The CTTMP will be determined with full public participation and input.

I-Hummel-2: See response I-Hummel-1.

I-Hummel-3: See response I-Hummel-1.

I-Jackson

## Comments

## Responses

USDI, Bureau of Land Management

Winnemucca District EIS/RMP

For the BLM to formally consider your concerns during development of alternatives for the Resource Management Plan (RMP), written comments are required. To assure consideration you should provide your comments **by September 25, 2010**.

Please fax your completed form to (775) 623-1503 or mail it to the address on the opposite side. You may also e-mail comments to [wfoweb@nv.blm.gov](mailto:wfoweb@nv.blm.gov), or complete an online comment form at [www.blm.gov/nv/st/en/fo/wfo/blm\\_information/rmp/getting\\_involved.html](http://www.blm.gov/nv/st/en/fo/wfo/blm_information/rmp/getting_involved.html)

In order to continue receiving information and future mailings about the WD RMP, you must ask to be added to the official RMP mailing list by submitting this form by **September 25, 2010**.

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the Winnemucca District Office, 5100 E. Winnemucca Blvd., Winnemucca, NV 89445, during regular business hours (7:30 AM to 4:30 PM), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your written comments. Such requests will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses or from individuals identifying themselves as representatives or officials of organizations or businesses.

Your Name Andrew Jackson - Jackson Ranch Today's Date 7-28-10

Please indicate your affiliation by checking one of the following boxes:

- |   |   |
|---|---|
| <input type="checkbox"/> Individual (no affiliation)              | <input type="checkbox"/> Private Organization |
| <input type="checkbox"/> Federal, State, Tribal, Local Government | <input type="checkbox"/> Citizen's Group      |
| <input type="checkbox"/> Elected Representative                   | <input type="checkbox"/> Regulatory Agency    |

Name of organization, government, group, or agency (if applicable) \_\_\_\_\_

Mailing Address PO Box 214

City/State/Zip Gerlach NV 89412

Telephone (optional) 775-221-1549 E-Mail Address (optional) \_\_\_\_\_

Would you like to be added to or remain on the WDO RMP/EIS mailing list to receive future project-related information? Yes  No

Please mark the appropriate category below and write your comments on the lines provided. Feel free to attach additional pages if necessary. (Note: Total mail piece must not exceed 1 ounce to use Business Reply Mail.)

- |   |  |
|---|--|
| <input type="checkbox"/> Access/Transportation  | <input type="checkbox"/> Recreation/OHV (Hunting, Fishing, Hiking, Biking, etc.)           |
| <input type="checkbox"/> Energy (Wind, Geothermal, Solar, etc.)                             | <input type="checkbox"/> Social/Economic Concerns  |
| <input type="checkbox"/> Fire Management  | <input type="checkbox"/> Vegetation/Noxious Weeds  |
| <input type="checkbox"/> Historic, Cultural, and Paleontologic Resources/Traditional Values | <input type="checkbox"/> Wild Horses and Burros  |
| <input type="checkbox"/> Land Tenure (Retention/Acquisition/Disposal)                       | <input type="checkbox"/> Wilderness, Wilderness Study Areas and Other Special Designations |
| <input type="checkbox"/> Livestock Grazing  | <input type="checkbox"/> Wildlife/Sensitive Species  |
| <input type="checkbox"/> Minerals (Hardrock, Oil and Gas)                                   | <input type="checkbox"/> Other Concerns (please define)                                    |
| <input type="checkbox"/> Planning/RMP Process   |  |
| <input type="checkbox"/> Soil/Water/Air/Visual Resources                                    |  |

I AM INTERESTED IN ALL ISSUES

I-Jackson

Comments

Responses

Bureau of Land Management  
 Winnemucca District  
 5100 East Winnemucca Blvd.  
 Winnemucca, Nevada 89445-2921

RECEIVED BLM  
 WINNEMUCCA NV  
 2010 OCT 22 PM 1:17

October 20, 2010

To whom it may concern:

These comments are in response to your request for public comment on your draft Resource Management Plan and Environmental Impact Statement.

Livestock Grazing:

The "No Grazing" alternative shouldn't even be considered. Grazing on public land had historical and legal standing even before the passage of the Taylor Grazing Act. Subsequent laws such the Federal Land Policy Management Act have reinforced the idea of grazing by domestic livestock as a benefit to the public lands and the rural economies.

Industries which utilize natural resources such as livestock production, mining, timber, farming and fishing, provide the base on which all economic activity and wealth creation depends. If someone isn't producing something real and useable at the bottom of the economic food chain, there would be no high paying jobs in healthcare, finance, government or anything else. We need to use the country's natural resources in a responsible and sustainable manner to keep our national economy viable.

Plant species evolved under pressure from grazing animals. Well managed livestock do not adversely affect the range and can be beneficial as many studies have shown. Public land grazing provides a stable economic base for the community as well as providing income to the public coffers in the form of grazing fees.

In addition, It's the ranchers who maintain the improvements such as spring developments, pipelines and troughs. Most of water rights on springs, creeks and other sources of water located on public land, particularly in Nevada, are privately held. Maintenance of water developments benefits not only livestock, but wildlife, "wild horses" and the public who use the public land for recreation.

Fire danger increases on land that isn't grazed as dry matter accumulates, increasing fuel for wildfires. Many of the devastating fires we are currently witnessing across the country are in areas that were previously grazed and now livestock are excluded.

The district failed to address suspended non use AUMs. These AUMs should be allocated for winter grazing use in appropriate areas to reduce fire danger and improve management. Winter grazing, when plants are dormant, causes no damage to the range, will reduce fire hazard and improve the permittees management alternatives.

AUMs should be allocated to the existing permittees within allotments where lands are traded or acquired by the BLM. The available AUMs allocated should be based on reasonable carrying capacity and good range science considering wildlife habitat but without prejudice to livestock.

I-Jackson-1:  
 BLM has developed a range of alternatives applicable to livestock grazing. See LG 1.3. The proposed final RMP/FEIS brings forward LG 1.3, the no-grazing option 2 applicable to C-LG 1.3 was not selected.

I-Jackson-2 -Specific allotment AUM allocation decisions are addressed at the site specific or allotment level. The method for returning suspended AUMs or increasing permitted use is covered in regulations at 43 CFR 4110.3-1 "Increasing Permittee Use". Addressed in LG 1.3

I-Jackson-3: BLM has developed a range of alternatives. This is addressed in LG 1.10

I-Jackson -1

I-Jackson-2

I-Jackson-3

I-Jackson

## Comments

## Responses

## Wild Horses

If lands are traded or acquired by the BLM, additional AUMs should not be allocated to wild horses. The BLM has been unable to keep the horse numbers at the management levels stated in the HMPs. Until the BLM is allocated adequate funding and can consistently reduce and then maintain the horse numbers at the levels designated in the bureau's HMPs, no additional horse AUMs should be allocated on any allotments.

The current horse populations are the progeny of the domestic and feral horse and need to be managed. It is imperative they are managed in accordance with the levels set in the herd management plans, not allowed to achieve excessive numbers to the detriment of other uses including wildlife, livestock and the range plant species. No grazing animal is more detrimental to the range resource than a horse. The BLM should remove all excess horses and remove any horses that venture into horse free areas. Additional funding needs to be allocated to gather and remove excess horse numbers.

## Wilderness

Permittees should be allowed vehicular access to spring developments and other range improvement projects for routine maintenance and improvement. Water developments benefit everything from wildlife to recreationists. You can't pack in troughs on horseback.

Additionally, private landowners should be allowed to maintain any existing roads which provide access to their private land without the threat of fines or other adverse action even if these roads are within a wilderness study area. The original intent of the wilderness act wasn't to prevent people from accessing their private land. If there is an existing road and it accesses private land, the landowner it should be able to maintain it.

This concept should apply to any existing roads which cross public land and access private land. The landowner should be able to maintain existing roads that access private property without harassment from federal employees.

I appreciate your consideration in these matters and thank you for extending the comment period.

Sincerely yours,



Susie Jackson  
P.O. Box 88  
Gerlach, Nevada 89412  
775-557-2757

I-Jefferson

**Comments****Responses**

October 25, 2010

Attention: RMP Team

**Bureau of Land Management, Winnemucca District**

5100 E. Winnemucca Blvd.

Winnemucca, NV 89445

**Subject: Comments Regarding the Winnemucca District Office  
Draft Resource Management Plan and Environmental Impact Statement**

Dear RMP Team:

Please accept my comments on behalf of myself and my hunting partners, many of whom visit and recreate within the Winnemucca District.

In general, I do not support Alternatives A, C1, and C2. Alternative A is based on outdated planning documents that do not sufficiently address current public land management challenges. Alternatives C1 and C2 are much too restrictive to adequately address major resource challenges, particularly in regards to fire and invasive weed species, and is not within the multiple use mandates. There are many portions of Alternative B that I support, but in general Alternative D appears to be the best overall option in my view. The comments below are more specific to what I would and would not support within the various alternative approaches.

**Water Resources**

I support Action D-WR 1.3; however, all standards, BMPs, etc should be developed or amended to be site specific in order to maximize effectiveness.

I adamantly oppose Action B-WR 2.1. Water distribution shall comply with State water law. Water importation and exportation shall stay with the defined ground water basin.

I am not generally supportive of water export or import projects. In terms of Action D-WR 2.1, the project proponent for any export or import should be required to monitor for resource damage to public lands and should be required to mitigate any negative impacts.

I am very supportive of Action D-WR 2.2. These projects should be developed in cooperation and coordination with authorized public land users and interests such as grazing permittees, and the Nevada Department of Wildlife in order to maximize locations for multiple benefits.

**Vegetation – Woodland/Forest Products**

I support Action D-VF 1.1 and D-VF 1.3, but am very skeptical about the use of fire in Action D-VF 1.2. I would suggest the inclusion of language that requires only cool-season burns when chance of fire spread is absolutely minimized.

I support Objectives D-VF 2 and D-VF 3 assuming that "Maintenance" of woodlands means active maintenance and not passive maintenance.

I-Jefferson-1: D-WR 2.1 references mitigation measures which, as with other economic ventures, would be provided by the proponent. Each case will be evaluated to determine the appropriate mitigation which could include resource damage monitoring.

I-Jefferson-2: Land health standards are generally broadly applied; however, BMPs and mitigation measures are project specific to help meet those land health standards.

I-Jefferson-3: The BLM adheres to United States Code: Title 43 USC 666, also known as the McCarran amendment, which requires that federal entities waive sovereign immunity and comply with state water law. If water law conflicts with management objectives and actions, the BLM will defer to state law and seek to use the most effective alternative means to manage the health of the land and its multiple uses.

I-Jefferson-4:

D-WR 2.1 references mitigation measures which, as with other economic ventures, would be provided by the proponent. Each case would be evaluated to determine appropriate mitigation which could include resource damage monitoring.

Land health standards are generally broadly applied, however BMPs and mitigation measures are project specific to help meet those land health standards.

I-Jefferson-5: Comment noted.

I-Jefferson-6: BLM has developed a range of alternatives. Refer to Action VWM 2.1. For most prescribed fire planning BLM adheres to cool-season burns. However, there may be situations where burning in warm season is necessary especially for research studies or in upper elevations. Limitations based on season may not allow for meeting management objectives.

I-Jefferson-7: Comment noted.

## I-Jefferson

## Comments

## Responses

Bureau of Land Management  
October 25, 2010  
Page 2

I am very supportive of Action D-VF 3.4, particularly to restore and protect critical sagebrush habitat for deer and sage-grouse.

I-Jefferson-8

In regard to Actions D-VF 4.1 and 4.2, the designation of old growth forest should be based largely on soil surveys and ecological site descriptions rather than a subjective process.

**Vegetation – Weeds**

I strongly support the stated Goal, Objective D-VW 1 and Action D-VW.1.1 to utilize an integrated approach to weed management and promotion of ecosystem resilience. I am adamantly opposed to Action C-VW.1.1 that does not allow for use of chemical treatments. Recent scientific findings suggest that chemical treatments can be extremely effective at promoting ecosystem resilience. The District must utilize ALL available means to prevent and minimize the spread of invasive vegetation.

I-Jefferson-9

I strongly support Action D-VW.1.2.2. I believe in collaborative processes to address major resource challenges. That being said, NGOs and Partnership Programs should be included in the list of entities to include in such processes. In particular, I support utilizing the strengths of groups like the Wildlife Conservation Group, the Nevada Partners for Conservation and Development and various sportsmen and wildlife conservation groups such as the Northern Nevada Chapter of Safari Club International, Nevada Muleys, Nevada Chukar Foundation, etc.

I-Jefferson-10

I strongly support the inclusion of Objective D-VW.2 and Action D-VW.2.1. Invasion of undesirable annual grasses is one of the biggest threats to wildlife habitat and ecological resilience, and all tools should be made available to deal with this problem. I am highly supportive of use of chemical treatments, prescriptive grazing, use of adaptive species, etc. to combat invasive undesirable annual vegetation.

I-Jefferson-11

**Vegetation – Rangeland**

I am generally supportive of the stated Goal; however, resilience of vegetative communities should be stated in the goal. The threat of fire and weeds within the district demands resilient ecosystems.

I-Jefferson-12

I am very supportive of Objective D-VR 1, Action D-VR 1.1 and 1.2. However, I am very concerned about the emphasis on use of prescribed and wild fire. I would prefer the use of other vegetation manipulations such as mechanical and chemical over the use of fire, which is much more risky.

I-Jefferson-13

I suggest the addition of a new Action D-VR 1.3 that would emphasize cooperation between the BLM and State agencies such as NDOW and NDF, conservation and wildlife NGOs, and partnerships to pool limited resources in order to maximize active management projects. Other western states, such as Utah, have been able to greatly increase restoration projects through such partnerships.

I-Jefferson-14

I am very supportive of Action D-VR 1.2.1 to utilize livestock in order to reduce fuels loads created by annual invasive species, provided it does not conflict with wildlife objectives. I would encourage the use of this approach to protect desirable habitat areas that are surrounded and threatened by fire from adjacent areas dominated by invasive vegetation.

I-Jefferson-15

I-Jefferson-8: According to the Healthy Forests Restoration Act of 2003 - Section 102(e)(1)(D) which states in part; “Old Growth Stands is “based on structure and composition characteristic of the forest type”... BLM policy per “The Healthy Forest Initiative and Healthy Forest Restoration Act – Interim Field Guide” further clarifies “the HFRA does not mandate particular definitions of “Old Growth” or specific process to identify old-growth stands.” BLM utilized existing structure and composition of the forest type to delineate old growth stands.

I-Jefferson-9: BLM identified a range of alternatives with respect to weed management. Alternatives A, B, and D all include chemical treatments.

I-Jefferson-10: The BLM complies with FLPMA and other applicable laws and regulations by employing principles of coordination, cooperation, consultation, and collaboration to enhance communication, obtain advice or opinion, encourage participation, and inform and engage diverse interested parties for the purpose of seeking solutions for managing public lands.

I-Jefferson-11: Comment noted.

I-Jefferson-12: Resilience of vegetative communities is stated in Objective VR 1.

I-Jefferson-13: BLM has developed a range of alternatives. See Action WFM 2.1.

I-Jefferson-14: The BLM has an extensive list of Cooperating Agencies and partners to accomplish public land management goals and objectives. The BLM complies with FLPMA and other applicable laws and regulations by employing principles of coordination, cooperation, consultation, and collaboration to enhance communication, obtain advice or opinion, encourage participation, and inform and engage diverse interested parties for the purpose of seeking solutions for managing public lands.

I-Jefferson-15: Comment noted.

I-Jefferson	Comments	Responses
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I-Jefferson-16	I have concern in regards to Action D-VR 1.3. While I support re-establishment of native vegetation, it is almost always difficult to do in the face of invasive weed species. Therefore, seed mixes should be determined on a case-by-case basis, and introduced species, proven to be competitive with invasive weeds, emphasized in areas where there is a high probability of establishment of undesirable/invasive weeds. I would also recommend the use of soil bio-assays to determine the condition of the existing seed bank when developing a seed mix. I also suggest that the BLM cooperate with the Agricultural Research Service, and/or utilize the best science, in order to identify and use the most desirable introduced species to prevent establishment of invasive species until native plants can become established.	I-Jefferson-16: According to BLM Emergency Stabilization and Rehabilitation Handbook, BLM policy is to determine seed mixes on a case-by-case bases. See also BLM Manual 1745 Introduction, Transplant, Augmentation, and Reestablishment of Fish, Wildlife, and Plants; and Executive Orders 11987 and 13112. Action D-VR1.3 prioritizes utilizing native seeds first, followed by non-natives. See also Action VR 4.1. Additionally, the BLM has an extensive list of Cooperating Agencies and partners to accomplish public land management goals and objectives.
I-Jefferson-17	I am generally supportive of Objective D-VR 3. However, an action item should be added to emphasize the need for seeding burned areas as soon as possible following wildfires. Restoration priorities should also be stated, for example, restoration in Priority 1 wildlife habitat should be emphasized as well as restoration in areas at higher risk for establishment of invasive weeds.	I-Jefferson-17: See C and D VR 4.1. BLM emergency stabilization policy requires seeding to be completed within 1 year from the date the fire is contained. Restoration priorities are also defined by BLM policy. The Winnemucca District strives to seed in the fall following the fire, usually within a few months depending on the date the fire is contained.
I-Jefferson-18	I am very supportive of Action D-VR 4.2; however, the first priority should be maintaining healthy habitats, then restoration of burned habitat, and finally treatment of monocultures. Once again, I would encourage the use of the best available science and working with a suite of partners to accomplish this action.	
I-Jefferson-19	I am fully supportive of Objective D-VR 5 and associated actions.  I am fully supportive of Objectives D-VR 6 and 7 as well as associated actions; however, I suggest that this Objective be given a higher priority. In my view, this should be a higher priority than restoring cheat grass monocultures.	I-Jefferson-18: BLM works with other partners in developing Emergency Stabilization and Rehabilitation Plans.
I-Jefferson-20	<b><u>Fish and Wildlife</u></b>  I am in full support of the described fish and wildlife goal, Objective D-FW 1, and associated actions. However, in addition to the areas listed under Action D-FW 1.1, I would urge the inclusion of the Pine Forest Range, and Granite Range including all areas north to and including Fox Mountain as Priority 1 Wildlife Habitat. These areas include highly productive wildlife habitat, especially for key game species such as mule deer, pronghorn antelope, bighorn sheep and sage-grouse. These areas are also highly popular with sportsmen and non-consumptive recreational users.	I-Jefferson-19: Maintain (6) and restore (7) sagebrush communities, these actions are not listed from high to low, there is no priority.
I-Jefferson-21	I am in full support of excluding new rights-of-way within Priority 1 areas, particularly in regards to renewable energy development. I do not oppose responsible energy development, but these areas are not suitable to such activities based on the rich wildlife diversity and popularity for recreational pursuits.  I adamantly oppose Action B-FW1.1.  I am in full support of Objectives D-FW 2, - 11 and all associated actions.	I-Jefferson-20: Granite Range is already proposed for exclusion area under Alternative C and D 5.4. Priority Habitat map has been revised for the FEIS. In addition, the area extending from the Granite Range to Fox Mountain is included as the proposed Priority 1 habitat. The proposed Pine Forest ACEC includes large acreages and addresses wildlife needs. An area south of the ACEC, that is important sage grouse habitat, has been reconsidered for designation as Priority wildlife habitat areas in the FEIS.
I-Jefferson-22	I am highly supportive of Action D-FW6.1, the development of wildlife water guzzlers to expand or mitigate wildlife population areas.  I am highly supportive of Actions D-FW 2.1 and 2.2, assuming this includes both the Statewide Wildlife Action Plan and Sage-grouse Conservation Plan. Another action should be added to encourage partnerships with NDOW, conservation and sportsmen groups to implement actions and projects identified within HMPs.	I-Jefferson-21: Comment noted.
		I-Jefferson-22: BLM has developed a range of alternatives.

I-Jefferson

**Comments****Responses**

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I also support, A-FW6.1, to construct and fence wildlife water developments to provide additional year long sources of water for the exclusive use of wildlife.

**Special Status Species**

I strongly support Action D-SSS1.2, Sage Grouse.

**Wild Horses and Burros**

I strongly support the reduction of the horse AML, Appropriate Management Level, of the population numbers of the wild horses within the Priority 1 and 2 wildlife habit designations. This concept promotes and encourages wildlife and minimizes wild life competition.

I strongly object to Alternative "C" Action Items, where no fertility control is utilized.

I support the management goal for WHB presented in Table 2-1 as well as the objectives of the Preferred Alternate D presented in Table 2-3. I have the following suggestions for additional management actions:

- BLM has not been able to conduct accurate census nor has been able to accurately conduct population models. An example of this fact is the Jackson Mountains where actual populations exceeded the projected population by 300 percent. An emergency gather was necessary resulting in the death of many animals due to poor condition. It is not known how much wildlife died due to over-utilized forage and competition at water sources. Direct counts by aerial census or inadequate correction factors have improperly been utilized in population estimates in the past resulting in more horses on the ground than projected. I therefore suggest the following management action: *"Regular aerial census shall be conducted on a maximum three-year interval utilizing the latest approved scientific methods. Census shall be conducted concurrently across the boundaries of HMA's, BLM districts, USFS, and USFWS lands. Appropriate correction factors shall be applied to all field census figures utilized in population models."*
- AMLs are often out of date providing grounds for protest and litigation. Range conditions and, therefore, carrying capacity for all species change with drought and wildfire. When range conditions are degraded, domestic livestock usage is decreased and wildlife populations adjust themselves downward (since the 1960's there is now half the domestic livestock AUMs and mule deer populations are on the steady decline, while wild horse populations have spiraled upward). I suggest the following management action: *"AML shall be reviewed and revised as necessary every 10 years, or following major wildfires, or five (5) years of drought."*
- The 2010 gather in the Calico Complex did not remove the number of excess horses planned in the EA. Horses simply migrate in and out of HMAs and HMA complexes. The post-gather census counted horse numbers 200 percent above the objective. I therefore suggest the following management action: *"Gather objectives shall be met even if crossing HMA boundaries are necessary."*

I-Jefferson-23:  
Suggested actions are in place through the Tri-State WHB Memorandum of Understanding.

I-Jefferson-24:  
Specific allotment AUM allocation decisions are addressed at the site specific or allotment level.

I-Jefferson-25:  
Comment noted

I-Jefferson-23

I-Jefferson-24

I-Jefferson-25

I-Jefferson

## Comments

## Responses

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I-Jefferson-26

- I fully support "self sustaining" wild horse and burro populations on our public land, but the definition needs to be clearly stated in this document. To achieve self-sustaining populations, the low range of AML must first be achieved, followed by intensive management techniques of fertility control, sex ratio manipulation, and creation of non-reproducing herds. I suggest the following management action: *"A sufficient number of large HMAs shall be analyzed and be converted to non-reproducing herds so that natural attrition in these HMAs could be supplemented from necessary gathers of excess animals in smaller HMAs and, along with adoption demand, result in a static population statewide – a true sustainable herd condition."* This management action would almost eliminate required gathers in the treated large HMAs, greatly reduce the need for future long-term holding and sanctuaries, reduce transportation and short-term holding needs, and tremendously reduce the program budget.

**Wildland Fire Ecology Management**

Fire suppression, pre-suppression and fuels management issues are described in several portions of this document. These points are not reiterated in this section.

I-Jefferson-27

As is referenced in the Executive Summary, fire suppression costs are increasing. The best method to reduce fire suppression costs is to keep fires small by managing incident response, potential fire environment and fuels.

I strongly support efforts in federal/state/local government/private initiatives in fire suppression and pre-suppression efforts. Continued support of these efforts and the components (training, red carding, equipping) should be referenced in the alternatives.

I-Jefferson-28

It is difficult to address which alternative/objective to support as there is a significant need for more information and variation in alternatives. In several alternatives and objectives there is considerable reference to the reduction of man-caused fire risk as access is limited. As the fire risk from lightning is far greater than man caused risk, research into how reducing access may result in delays in suppression activities on lightning caused fires is necessary. The benefits of utilizing access roads as fuel breaks for various suppression activities in a continuous fuel bed must also be addressed.

I-Jefferson-29

Livestock grazing alternatives do not specifically address fire fuels management, unless that is in the grazing standards referenced. Areas selected for restricted grazing or closed to grazing should include an exemption if grazing for fire fuels management is indicated

**Recreation, Visitor Outreach and Services**

I strongly support Action Item D-R2.1.1 and D-R3; providing the public and the youth with a better understanding of our area's natural resources is important.

General Note: I would like to be notified and involved with the Transportation Plan and its updates.

**Renewable Energy**

I-Jefferson-30

I support the Renewable Energy Goal and Objective D-RE 1; however, would strongly recommend the addition of language that requires the BLM and renewable energy project proponents to consult with local stakeholders and the County to identify and address any concerns prior to submittal of a plan of development.

I-Jefferson-26: Comment noted.

I-Jefferson-27:

Objectives and Management Actions Common to All Alternatives – Wildland Fire Ecology Management includes: CA-WFM1 & CA-WFM 1.1-1.5 which addresses suppression management priorities. Objective CA-WFM 3 and Management Actions CA-WFM 3.1-3.3 addresses management of fuels. Fuels Management is also addressed in section WFM 2.

I-Jefferson-28: Winnemucca District fire history shows about half of all fires are human caused. The Winnemucca District has a long history of utilizing roads as fuelbreaks or to enhance fuelbreaks. Appendix B-BMPs and SOPs has been revised to reflect: Where practical construct fuelbreaks/greenstrips in areas previously disturbed such as along roadways and in previous burned areas.

I-Jefferson-29: See VR 1.2 There are a range of land and vegetation treatments available to protect, maintain, or improve vegetation that are available, including livestock grazing if appropriate. Action WFM 2.1 has been modified to include prescribed grazing for Alternatives A,B, and D.

I-Jefferson-30: All Renewable Energy Plans of Developments are required to be reviewed under NEPA. This process is a public process. Local governments may be invited to be Cooperating Agencies in the NEPA process.

## I-Jefferson

## Comments

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## Responses

I-Jefferson-31

I strongly support the concept of avoidance and exclusion areas as described in Actions D-RE 1.2 and 3. However, I would urge the inclusion of the Pine Forest Range, and Granite Range including all areas north to and including Fox Mountain as exclusion areas rather than avoidance areas. These areas include highly productive wildlife habitat, especially for key game species such as mule deer, pronghorn antelope, bighorn sheep and sage-grouse. These areas are also highly popular with sportsmen and non-consumptive recreational users.

**Transportation and Travel Management**

The final document needs to include a specific definition of "Limited Access" rather than a reference to another document or policy. Should that definition change, the parameters of this entire section would change.

I am supportive of the stated Transportation and Travel Management Goal.

I-Jefferson-33

I am generally supportive of Objective D-TA 1 and associated actions. I do have a concern with action D-TA 1.4. This action should be taken only after consultation with NDOW to ensure that seasonal or temporary closures do not limit access to public lands during hunting seasons.

I am very supportive of Objective D-TA 2 and Action D-TA 2.1.

I-Jefferson-34

I am extremely concerned with Objective D-TA 4 and associated actions. I am not opposed to the principal of these items, but I will not support the closure or re-routing of any existing roads without extensive public participation and input. My understanding was that these actions would be identified through a Transportation Planning Process that would include extensive public involvement. If that is in fact the case, it should be clearly indicated within Objective D-TA4.

**Lands and Realty**

**Areas of Critical Environmental Concern**

I am not opposed to the proposed ACECs in general. However, in terms of the Pine Forest ACEC, I urge the incorporation of the boundary adjustments and management stipulations developed by the local Pine Forest/Alder Creek WSA Working Group as adopted by the Humboldt County Commission.

**Wilderness Study Areas and Lands with Wilderness Characteristics**

I-Jefferson-36

I am fully supportive of the Wilderness Characteristic Designations in Pershing County ASSUMING that these areas accurately reflect the input of the local working group that was formed during the County Lands Bill Process.

I-Jefferson-37

I am fully supportive of designating the Granite Range and Fox/Buckhorn Mountain as Priority 1 wildlife habitat. I am of the opinion that this is adequate protection for these areas, and therefore do NOT support the classification of these areas as wilderness or identified as areas with wilderness characteristics. There are too many restrictions that come with potential wilderness designations given the potential need for proactive habitat management, fire suppression, pre-suppression and restoration in these areas. Also, assuming that a travel management plan is developed for these areas, there is not a concern with cross-country travel. Wilderness designations have the potential to greatly reduce access to highly desired recreation areas, and seems to be in conflict with the Special Recreational Area Designation. For these reasons, I do not support identifying these areas under the Wilderness Characteristic Designation.

I-Jefferson-31: Granite Range is already proposed for exclusion area under Alternative C and D 5.4. Refer to Figure 2-62. The Fox Range and Pine Forest Range are WSAs which, in accordance with the Interim Management Policy, are excluded from right-of-ways and discretionary actions. The proposed Pine Forest ACEC includes large acreages and addresses wildlife needs. An area south of the ACEC, that is important sage grouse habitat, has been reconsidered for designation as Priority Wildlife Habitat in the FEIS.

I-Jefferson-32: See Action D-R 10.1 for the BLM definition of "Limited".

I-Jefferson-33:

A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the ROD for the RMP is signed. The CTTMP will be determined with full public participation and input.

I-Jefferson-34: Comment noted.

I-Jefferson-35: Comment noted.

I-Jefferson-36: These are the areas designated by the working group.

I-Jefferson-37: Comment noted.

I-Jefferson

## Comments

## Responses

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Summary

I support the idea of preserving the rights of the sportsmen and promoting wildlife conservation.

I would like to promote the idea of team and working together to accomplish and support those ideas.

I would like to be involved and participate in the BLM process now and in the future.

The following will highlight a few of my thoughts:

1. Water Resources should be preserved to support the wildlife it serves and stay within the boundaries or basin they serve.
2. Promotion of the wildlife habit and the management of that habit are extremely important. Restriction to that management and the tools they use should not be restricted, particularly with fire fighting.
3. The encouragement of habitat development is extremely important to the promotion and the health of the wildlife population.
4. The establishment of the priority habitat appears to be a great concept. We would like to see areas defined to promote wildlife. With the development of these areas, we would also not like to see the sportsman access be reduced or diminished.
5. The idea of ALM reductions in the priority wildlife management areas would greatly enhance and benefit the quality of wildlife.
6. Fire protection and fire fighting capabilities should become a high priority as the priority habitats are defined and action plans should be in place. The idea of promoting a private/public partnership for fire fighting should be in the plan policy.
7. The idea of protecting defined wildlife priority areas against commercial development, whether it is renewable energy or mining is also essential to the promotion of wildlife
8. The concept of public education regarding habitat and wildlife issues is critical. The general public and the kids need to be educated regarding the rangeland, feed, water and sustainability issues associated with our outdoors.

Sincerely,



Brett K. Jefferson, Sportsman  
2385 Libero Drive  
Sparks, Nevada 89436

I-Jefferson-38: Objective D-WR 2 includes providing water for wildlife on public lands. The BLM does not anticipate transporting water for wildlife purposes.

I-Jefferson-39: Fire fighting tactics are implementation level decisions and are made on a case-by-case basis.

I-Jefferson-40: Comment noted.

I-Jefferson-41: Delineation of priority wildlife habitat, priority sage-grouse habitat, and priority watersheds management includes use restrictions which would protect special status species habitat and other important wildlife habitat. See D-FW 1.2, D-WR 1.4, and D-SSS 1.2N.

I-Jefferson-42: AUM adjustments are done on a case-by-case basis by allotment.

I-Jefferson-43: The RMP prioritizes priority wildlife and sage-grouse habitats for fire suppression. See CA-WFM 1(3).

I-Jefferson-44: Comment noted.

I-Jefferson-45: Providing public education and outreach are addressed under Recreation Objectives R 2 and R 3.

I-Jensen

Comments

Responses

WINNEMUCCA RMP

RECEIVED BLM  
WINNEMUCCA NV

C/O BOB EDWARDS

2010 OCT 25 PM 2: 14

BLM WINNEMUCCA DISTRICT OFFICE,

510 E. WINNEMUCCA BLVD.

WINNEMUCCA, NV 89445

DEAR MR. EDWARDS

MY WIFE AND I OWN PROPERTY IN THE HUMBOLDT RIVER RANCH.

WE ARE OPPOSED TO HAVING CATTLE GRAZING ON THE HUMBOLDT

RIVER RANCH PROPERTY.

THANK YOU.

*Elwyn C. Jensen* ELWYN C. JENSEN

*Shirley E. Jensen* SHIRLEY E. JENSEN

I-Jensen

I-Jensen: Comment noted.

I-Johnson & Pascoe

Comments

Responses

RECEIVED BLM  
WINNEMUCCA NV  
2010 SEP 13 PM 1:49

PO Box 228  
Denio, Nv. 89404  
September 6, 2010

Mr. Bob Edwards  
Winnemucca District Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445-2921

RE: Comment on the Winnemucca RMP

Dear Bob;

We have the following comments to make on the draft Winnemucca RMP/EIS:

Lands and Realty

The goal under the Lands and Realty section in the draft RMP/EIS is to “ Retain public lands, dispose of only those lands that consolidate land patterns to ensure effective administration, improve resource management and promote community development”.

In the alternative section of the draft RMP you have identified lands that may be considered for disposal through various alternatives and have shown them on maps in Volume 5 - Appendices in Figures 2-72, 73 and 74.

I-Johnson & Pascoe-1

Although we appreciate the fact that BLM lands have been identified for disposal around Alder Creek Ranch, we would like to suggest those lands be expanded to accommodate future expansion of our operation. We have included a map for your review and consideration.

I-Johnson & Pascoe-2

In addition, there are other small areas not on the submitted map that we would like to negotiate with you. These areas are Boyd Basin and Magee Mountain. We would like to put a well on Magee Mountain so we can have a water supply up there to hold the cattle for grazing.

I-Johnson & Pascoe-3

As you know, we have been working with the stakeholder group on possible wilderness boundary recommendations for the Pine Forest Range. As a part of this process, we have expressed an interest in possibly exchanging some of our private lands directly along the eastern boundary of the Blue Lakes Wilderness Study Area for lands closer to the Alder Creek Ranch itself. If in the future this process moves forward, we would like the final Winnemucca RMP to be consistent with the intent of this exchange and show the lands we might be interested in acquiring around the ranch in a disposal category.

I-Johnson & Pascoe-1, 2 and 3: BLM revisited lands suitable for disposal. See Figure 2-66 and Sections LR 1.1 and LR 2.1. BLM has considered this comment and has included certain lands as suitable for exchange/disposal in the RMP. The attached map was reviewed and considered; however, it is not included in this Appendix. To view this document contact the Winnemucca District Office at 775-623-1500, or via e-mail at wfoweb@blm.gov.

I-Johnson & Pascoe

Comments

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Page 2

If this process goes through, we would like to put crested wheat on those areas that cannot be irrigated and to expand pasture or alfalfa on other sites. Those options will provide us with more private feed options in the event of a drought, fire or other unforeseeable events.

Should you have any questions on this, we would be happy to discuss this with you.

Sincerely,



Buck Johnson  
775-941-2247



Kent Pascoe

ENC.

I-Jones

Comments

Responses



**Ryan Jones**  
Sent by: erebus@gmail.com  
10/04/2010 04:13 PM

To: wdmp@blm.gov  
cc:  
bcc:  
Subject: Comment on Winnemucca District RMP

Ryan Jones  
10/4/10  
Private Individual--please withhold my address



I-Jones

Hello, I am concerned about the preferred alternative (D) proposed in the Winnemucca RMP. I am an avid hunter, fisher, and hiker. I also enjoy using recreational off-high vehicles responsibly. The proposed alternative's plan to limit public access for recreational use will greatly diminish my access to these public lands. Please re-consider your proposal to restrict access to 95% of the District lands and balance this with a greater recreation/ohv balance.

regards,  
Ryan Jones.

I-Jones-1:  
A range of alternatives was developed offering travel management options. See R 10.1.

I-Kilby

Comments

Responses



Sandra Kilby  
<sandra.kilby@gmail.com>  
10/25/2010 07:14 AM

To: wdrmp@blm.gov  
cc:  
bcc:  
Subject: Protect the wild horses and burros in Winnemucca District

Wild horses and burros are the greatest representation this country has demonstrating the freedoms allowed living in the United States. We must do all we can to protect them and their freedom. They have sacrificed in developing this great country, our future children must be able to witness their beauty of enjoying such freedoms. It is our duty as human beings to help preserve them. Their protection is of the utmost importance.

I-Kilby-1:  
Comment noted.

I-Kilby

I-Kudrna

## Comments

## Responses

Hello and Greetings from Northwest Humboldt County Nevada

I have finally completed reading the hundreds of pages in the Winnemucca District Office Draft Resource Management Plan and Environmental Impact Statement and wish to have my comments read into the record as follows:

1A General Comment, not specifically directed at the WFO RMP/EIS but hopefully to be implemented on a much larger scale. The current RMP/EIS system and format is flawed and inadequate. It is in need of a total revamp. In this modern technologically savvy society, now is a really good time to do a survey of public opinion to guide the BLM in its mission i.e. the Management of our Multiple Use Public Lands "for the people." There should be a survey developed using a broad based coalition of U.S. citizens and leaders of the numerous U.S. Special Interest Groups (there are literally thousands). Once it is developed the survey should then be widely publicized by the letting the public know BLM needs and wants their input. The responses from throughout the country then should demonstrate the desires of the people. The results should then be used to guide the BLM in its management of the resources within all of our national Public Lands.

2

3While most, if not all, the environmental special interest groups will be just fine with the current format and system used in the preparation of the WFO RMP/EIS, the interests of the majority of the U.S. Citizenry and most of the other thousands of special interest groups are mostly disregarded. Instead of the RMP/EIS document focusing on the needs and wants of the majority of the American People and taking into consideration the needs and wants of all the many other special interest groups in the land, the special interests of only a small portion of the environmental movement are the focus of not only the study completed but unfortunately, this same focus continues on as the focus for the management plan proposed for the future of this region. It may be that the "interdisciplinary team" which was used to prepare the documents were primarily made up of BLM personnel close to the environmental movement but, if that was or is the case such a team is not a team capable of formulating a "Resource Management Plan" to serve the wants and needs of the majority of the American People and the Region.

4

5No attention whatsoever was employed by the interdisciplinary team, within the RMP/EIS document, to the other important laws of our great nation... not the least of which laws is what is most commonly referred to as the Americans with Disabilities Act. I believe when tested, it will be impossible for the US Supreme Court not to find this RMP not only in violation and without consideration of numerous other existing US laws but, it will be found simply unconstitutional as, it proposes significant unconstitutional restrictions on the public's use of the WFO multiple use public lands.

6

7Alternative A (the "no action" alternative) is the only valid alternative contained in the WFO RMP/EIS I received and read. It proposes no change to "current management." Yet, various laws and rulings, since the 1982 Sonoma-Gerlach MFP and the Paradise-Denio MFP and the 1999 Lands Amendment have changed, been modified by or not yet implemented and as such BLM cannot make decisions due to unresolved conflicts within these documents and rules.

8

9Alternative B Places significant new restrictions on the public use of the WFO Public Lands yet, it does indicate BLM will do restoration of vegetation to improve "fire regime condition classes fire regimes where appropriate" whatever that means. It does not include repairs to water sources, management on the Range of Wild Horses, maintenance of roads and trails to allow safe public access,

I-Kudrna-1

I-Kudrna-1: The BLM is required to make land use plan decisions that are consistent with laws governing the administration of public lands and with state and local plans to the maximum extent consistent with Federal law (Land Use Planning Handbook H-1601-1).

I-Kudrna-2

I-Kudrna-2: Alternative A contains present management as identified in the existing land use plans and amendments. Laws, regulations and policies implemented after the adoption of the MFPs are also reflected in Alternative A. NEPA requires a range of alternatives which are presented in Alternatives B through D.

I-Kudrna-3

I-Kudrna-3: Refer to Actions CA WR 3.1. Maintenance of roads and trails, public access will be addressed in the forthcoming Transportation and Travel Management Plan.

I-Kudrna	Comments	Responses
I-Kudrna –3 Cont-d	<p>↑ or many other important general goals which should be an integral part of any good forward thinking Resource Management Plan. As such this alternative should not have been included as an alternative for consideration without significant additions..</p>	
I-Kudrna –4	<p>1Alternative C - Option 1 Places even more significant new restrictions most of which are environmental special interest group related on the public use of the WFO Public Lands than does Alternative B and still does not contain any proviso for repair of water sources, management on the Range of Wild Horses, maintenance of roads and trails to allow public 2safe access, or many other important general goals which should be an integral part of a good forward thinking Resource Management Plan for the region. As such this alternative should not have been included as an alternative for consideration without significant additions.</p>	I-Kudrna-4 and 5: BLM has developed a range of alternatives.
I-Kudrna –5	<p>3 4Alternative C - Option 2 Is the same as Alternative C - Option 2 except it purports to eliminate cattle grazing on the WFO Public Lands. As the elimination of cattle grazing on Public Lands is against the Law which established grazing on Public Lands “the Taylor Grazing Act” this is certainly a ridiculous alternative which should have not made it to the Draft RMP and appears to be pandering, by the interdisciplinary team, to a relatively insignificant group of people who are against cattle grazing on Public Lands. The same as Alternative B and Alternative C – Option 1, Alternative C – Option 2 does not contain any proviso for repair of water sources, management on the Range of Wild Horses, maintenance of roads and trails to allow safe public access, or many other important general goals which should be an integral part of a good forward thinking Resource Management Plan for the region. As such this alternative should not have been included as an alternative for consideration.</p>	I-Kudrna-6 : See proposed Action D-R 10.2 & D-R 10.3
I-Kudrna –6	<p>5 6Alternative D (Preferred Alternative) Shows clearly the environmental bent of the interdisciplinary team. It places incredible new restrictions on the public access and use of the public lands of the Winnemucca Field Office, reduces the lands available for disposal by 2/3, limits the public to travel only on designated routes, and yet the same as Alternative B,</p>	This will be further addressed and brought forward in the subsequent Transportation & Travel Management Planning processes.
I-Kudrna –7	<p>7Alternative C – Option 1, and Alternative C – Option 2, Alternative D does not contain any proviso for repair of water sources, management on the Range of Wild Horses, maintenance of roads and trails to allow safe public access, or many other important general goals which should be an integral part of a good forward thinking Resource Management Plan for the region. As such this alternative should not have been included as an alternative for consideration.</p>	I-Kudrna-7: Refer to response to I-Kudrna-3
	<p>Conclusion: The Winnemucca Field Office manager should counsel his interdisciplinary team on what a valid, forward thinking Resource Management Plan which promotes use of the WFO public lands by the people of this great nation should look like and contain and require them to “DO OVER.”</p>	
	<p>Unfortunately, I was real disappointed and actually somewhat disturbed after reading several hundred pages as I found, the current Draft RMP/EIS for the WFO, mostly just a bunch of new restrictions on the public's use of the WFO public lands with almost no Management Plan substance on any of the most important issues in the Region.</p>	
	<p>A “DO OVER ORDER” from the Winnemucca Field Office Manager is really in order.</p>	
	<p>Respectfully Submitted via e-mail 10 – 16- 2010</p>	

I-Lacaillade

Comments

Responses

September 13, 2010

Winnemucca RMP  
c/o Bob Edwards  
Bureau of Land Management  
Winnemucca District Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445

RECEIVED BLM  
WINNEMUCCA NV  
2010 SEP 16 PM 3:03

Dear Bob;

As a property owner at Humboldt River Ranch Subdivision, I support the alternative "Action D-LG 1.3" as outlined in the Draft of the BLM Resource Management Plan (Volume 2 - Chapter 2). I would like to see all cattle grazing removed from within the subdivision for the health and safety of residents, visitors and the cattle. I support the efforts of the HRRRA Board of Directors in their efforts of eliminating the cattle grazing within the subdivision.

I would also like to see Dolly Hayden and Thomas Canyon closed to livestock grazing.

I would like to comment about some of the other areas listed: We moved to Winnemucca in 1980 and have always enjoyed the great outdoors. I am very familiar with many of the canyons and springs in Humboldt and Pershing Counties. Over the years I have seen a continuing degradation of water areas that have allowed grazing. Unfortunately, cattle are not discriminating regarding where "they take care of business". I am not against grazing as I believe it helps control weeds and growth, thus helping prevent wildfires, but I am concerned that many springs, creeks, etc. are heavily polluted by the cattle. I would like to see additional effort made to protect these valuable resources.

Sincerely,



Joyce Lacaillade  
7445 Stratus Street  
Winnemucca, NV 89445

I-Lacaillade-1:

A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the Record of Decision for the RMP is signed. The CTTMP will be determined with full public participation and input.

See Vegetation-Riparian and Wetlands for a range of alternatives for managing these areas, including managing uses.

I-Lacaillade-1

I-Laravie

Comments

Responses

Joe Laravie <laravie@frontiernet.net>

09/20/2010 03:22 PM

To: wfoweb@nv.blm.gov  
cc:  
Subject: Winnemucca RMP, Edwards

Dear Mr. Edwards:

Here are several comments regarding the Winnemucca RMP.

I-Laravie

Comments

Responses

Comments on mineral exploration activities:

The severe restriction of areas in which motorized cross-country travel is allowed in

alternatives B, C, and D would negatively affect the early stages of mineral exploration.

Early-stage mineral exploration activities such as geologic mapping, soil and rock sampling,

geophysical surveying, and even claim staking currently utilize motorcycles, all-terrain

vehicles, and 4WD pickup trucks to varying degrees. Most of these activities generally take

place well before claims are staked, and are necessary to establish whether the ground is

sufficiently prospective to justify staking claims.

Claim staking itself would be much more expensive, because claims would have to be staked on

foot. Permitting before staking claims is very unlikely to occur due to confidentiality

reasons.

The overall result of the adoption of alternatives B, C, or D will be less exploration, fewer

claims staked, fewer new mineral deposits found, fewer new mines commissioned locally, and

more high-paying exploration and mining jobs transferred elsewhere in the world, where the

political framework for exploration remains significantly less difficult.

Comments on geological mapping activities in general:

Geological mapping provides the basic framework data for numerous disciplines, including

hydrology, soil study, environmental studies, civil engineering, and regional geology studies.

The proposed regulations will negatively affect all geological mapping. There needs to be a

procedure for allowing off-road vehicular travel for geological mapping purposes not immediately related

to mineral exploration or mining. According to the Nevada Bureau of Mines and Geology, "Only

I-Laravie-1: Procedure for allowing off-road vehicle travel is the type of issue that is addressed in a Transportation and Travel Management Plan. This level of activity planning will be undertaken after the Resource Management Plan is in place and it is conducted in a manner consistent with the NEPA Environmental Assessment process. The BLM has revised the geology section in the FEIS/RMP.

I-Laravie-1



I-Laravie

Comments

Responses

I-Laravie-1  
Cont-d:



about 20% of Nevada's 1,980 7.5-minute quadrangles are adequately mapped with the detail that is needed for most applications".

I-Laravie-1-

General comments:

I-Laravie-2



The terminology used is confusing. What is the definition of a "motorized vehicle"? Does this include electric driven vehicles with wheels? What about robotic vehicles with legs? Segways? Would a helicopter be allowed to land? It seems it would be legal to use a horse-drawn wagon off-road. Have you studied the possibility that animal-powered vehicles might cause more environmental damage than petroleum or electric-powered vehicles? These regulations may have the effect of turning the transportation technology clock back more than a century without significant benefit to the environment.

I-Laravie-2:  
Definitions of OHV are provided in the Handbook of Travel and Transportation Management. Glossary has updated to reflect definition of motorized vehicle.

I-Laravie-3



Where is a map of the "designated travel" routes? How do you expect the public to understand your proposals without this critical information? Appendix J has no useful information in this regard.  
For these reasons, I am in favor only of alternative A. The other alternatives are simply a license to do whatever you want in terms of restricting off-road travel.  
Joseph A. Laravie  
135 Flora Place  
Spring Creek, NV 89815  
775-777-8223  
775-397-1424 (cell)  
www.greatbasingis.com

I-Laravie-3:  
A Comprehensive Transportation & Travel Management Plan (CTTMP) will address these concerns after the Record of Decision for the RMP is signed. The CTTMP will be determined with full public participation and input and will designate travel routes depending on which alternative is selected.

I-Little

Comments

Responses



Rhea Little  
 <horsesense56@yahoo.com>  
 10/25/2010 09:18 AM

To: wdrrmp@blm.gov  
 cc:  
 bcc:  
 Subject: Fw: Public Comment for the Winnemucca Field Office

--- On Mon, 10/25/10, Rhea Little <horsesense56@yahoo.com> wrote:

From: Rhea Little <horsesense56@yahoo.com>  
 Subject: Public Comment for the Winnemucca Field Office  
 To: Date: Monday, October 25, 2010, 9:17 AM

To The Bureau of Land Management- Winnemucca Field Office: Public Comment  
 October 22,2010

We need independent analysis non related to the BLM on Environmental Impact Records on each of the Wild Horse and Burro's managed Territory's and Ranges.

- I-Little -1 ↕ We need Wild Horse and Burro areas or Ranges that are Protected Sanctuaries, so that the preservation of the Wild Horse and Burro's Bans can stay together, there needs to be Herd numbers of 150+ Wild Horses so as studies have shown is needed to have a viable Herd. Any amount less than 150, sterilization should not be used. This would also, and can serve as a Eco Tourism area that the Wild Horse and Burro's can be viewed by the many tourists that come from all over the World to see our American Wild Horse's and Burro's.
- I-Little -2 ↕ There needs also to be a independent study of livestock all breeds and other wildlife users of the areas , how many , age , sex, this would give all of us an idea of the balance of the use of our public lands. There is a need to remove livestock and DE-crease the allotments that are given out each time a assessment of the area is done , rather than always the removal of excess Wild Horses and Burro's. The information needs to be easy for the general public to locate and freely access at their conveyance. This is the old way and needs to be changed, so it is fair and balanced for all.
- I-Little -3 ↕ The removal of Wild Horses and Burros without new and independent counts and old out of date data, using a old method that obviously doesn't work, in the BLM best interest to protect and manage our public lands, for the American People and their Children and Grandchildren. There are more affective ways of getting the count and age, sex of these Wild Horses and Burros. That would be less intrusive to the Wild Horses and Burro's and have a accurate count and data. The method of which is being used is invalid and outdated.
- I-Little -4 ↕ There are other ideas out there for managing Wild Horses and Burro's, If the BLM would encourage the general public and put out an effort to ask, and truly take in consideration of what is a new idea, it wouldn't hurt to try some of them. anywhere from the counting to the range assessments to the way the Wild Horses and Burro's are gathered , with no need for the separation of their Family Bans. I Think the reason you hear so little from the general public is that they know anything that would be mentioned would not even be listened to, the BLM has a stigma of doing things the same old way no change in plan or directions, this needs to change there is a new awareness upon all of us, and it wouldn't hurt to try to work with those who the BM seems to think are the enemy. Most are concerned for the Wild Horses and Burro's and all Wildlife, our Beautiful Public Lands, Forestry . We have the knowledge and the people to change this and make this a easier way for both the Wild Horses and Burro's . Lets not say well we can't let's say we Can and Will.

I-Little-1: See Objective D WHB 5.

I-Little-2: The WFRHBA requires the BLM to manage horses in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands (16 USC § 1333(a)). *See also Animal Protection Institute of America*, 109 IBLA 112, 115 (1989) (—...the \_benchmark test ‘for determining the suitable number of wild horses on the public range is \_thriving natural ecological balance’...) (Dahl v. Clark, 600 F. Supp. 585, 594 (D. Nev. 1984)).

I-Little-3: According to Handbook 4710, Population size should be estimated primarily by aerial survey. Two techniques, mark-resight using photographs and simultaneous double-count with sightability bias correction, should be used as the principal methods for estimating wild horse and burro population numbers. These techniques may be modified pending further research.

Selection and use of a specific technique should be based on the HMA or complex’s topography, size, and vegetative cover. Mark-resight using photographs should be conducted using a helicopter. Simultaneous double-count with sightability bias correction can be conducted with either a helicopter or fixed wing aircraft.

I-Little-4: Secretary Salazar and BLM Director Bob Abbey both requested public input on WH&B management as part of the development of the strategic plan.

I-Little

Comments

Responses

I-Little -5



One idea which is not a new idea, but has not been used, Bait trapping for removal, counting / getting estimated age, sex / how many foals in one ban. There would be no need of helicopter use for gathers, less Tax dollars would be spent and less injury or deaths of the Wild Horses or Burro's. This could be a Win Win for all.

If fencing were put in place with Volunteers and hay was placed, once the Family Ban is in the large fenced area, close the gate behind them, if there is water and food and no other Family Bans in with them they will stay calm.

Once the Family Ban is enclosed, then age could be estimated and counting, sex could be determined and if there will be the use of contraception they could dart the females that are going to receive this.

I-Little -6



The use of chart to touch on the points /marking/sex/age of each of the Wild Horses or Burro's and the picture of each including the foals. If at that time a expert on Horses Or the Veterinarian say that one or two may have to be removed because of injury or age, they could be directed away in the pen and baited through a shoot to a trailer. Then release the Family Ban and if needed move the fencing to another location in Herd Area until each Family Ban has been charted, and before all of this process even begins have in place the different Horse Rescues and Sanctuaries ready for receiving the ones that will need to be removed.

This may take longer the 1st time for each of the different Wild Horse and Burro areas/Territory's and or Ranges, but after this was done the BLM would have a total count and documentation of each of the Wild Horses and Burro's within that Herd Area, You would know how many foals, how many females and if they were injected with birth control and only use the birth control in herd areas where there are more than 150 Wild Horses.

Ask for Volunteer help, if they live in the herd areas there are quite a few who would take on the task of going out every 3-4 months to check on any movement between the Family Bans, It may come in some of the areas that the BLM will have to go out to collect the new data.

As we all know sometimes females will go to another family ban, and the young at around the age of 2-3 are driven out of their Family Bans to go create their own new Family Ban or join another Family Ban so they keep viable herds. Then once every few years the females will need to be darted this can be done by horse back, or on foot.

Once you have the pictures and data from a herd management area and know of the changes within the different Family Bans and who has been injected and the age, you will now have a accurate count and data.

Thank You,  
Rhea Little  
HC38 Box 828  
Las Vegas, NV 89124

I-Little-5: Bait trapping is a viable removal tool for some HMA gathers. The Winnemucca District has used this tool in the past and will continue to utilize bait trapping on a case by case basis.

I-Little-6: Handbook 4700-1 states, "In the past, genetic diversity was assessed by evaluating blood samples from the herd. Hair samples are now used to assess genetic diversity. Procedures for collecting and processing WH&B hair samples are described in Appendix 1 (Genetics Data and Hair Sample Collection Instructions). A report assessing genetic diversity is developed for each set of samples from an HMA."

I-Luke. B.

Comments

Responses

USDI, Bureau of Land Management

Winnemucca District EIS/RMP

For the BLM to formally consider your concerns during development of alternatives for the Resource Management Plan (RMP), written comments are required. To assure consideration you should provide your comments by **September 25, 2010**.

Please fax your completed form to (775) 623-1503 or mail it to the address on the opposite side. You may also e-mail comments to wfoweb@nv.blm.gov, or complete an online comment form at [www.blm.gov/nv/st/en/fo/fo/wfo/blm\\_information/rmp/getting\\_involved.html](http://www.blm.gov/nv/st/en/fo/fo/wfo/blm_information/rmp/getting_involved.html)

In order to continue receiving information and future mailings about the WD RMP, you must ask to be added to the official RMP mailing list by submitting this form by **September 25, 2010**.

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the Winnemucca District Office, 5100 E. Winnemucca Blvd., Winnemucca, NV 89445, during regular business hours (7:30 AM to 4:30 PM), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your written comments. Such requests will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses or from individuals identifying themselves as representatives or officials of organizations or businesses.

Your Name Humberto Luke Today's Date 9/27/2010

Please indicate your affiliation by checking one of the following boxes:

- Individual (no affiliation)
- Federal, State, Tribal, Local Government
- Elected Representative
- Private Organization
- Citizen's Group
- Regulatory Agency

Name of organization, government, group, or agency (if applicable) \_\_\_\_\_

Mailing Address 11530 Deaumont Trail

City/State/Zip Levack, Nevada, 89419

Telephone (optional) 531-709 E-Mail Address (optional) \_\_\_\_\_

Would you like to be added to or remain on the WDO RMP/EIS mailing list to receive future project-related information? Yes  No

Please mark the appropriate category below and write your comments on the lines provided. Feel free to attach additional pages if necessary. (Note: Total mail piece must not exceed 1 ounce to use Business Reply Mail.)

- Access/Transportation
- Energy (Wind, Geothermal, Solar, etc.)
- Fire Management
- Historic, Cultural, and Paleontologic Resources/Traditional Values
- Land Tenure (Retention/Acquisition/Disposal)
- Livestock Grazing
- Minerals (Hardrock, Oil and Gas)
- Planning/RMP Process
- Soil/Water/Air/Visual Resources
- Recreation/OHV (Hunting, Fishing, Hiking, Biking, etc.)
- Social/Economic Concerns
- Vegetation/Noxious Weeds
- Wild Horses and Burros
- Wilderness, Wilderness Study Areas and Other Special Designations
- Wildlife/Sensitive Species
- Other Concerns (please define)

I-Luke-1

I am interested in proposal D for grazing of  
livestock at Humboldt River Ranch.  
I think proposal D for HRR is good.  
Please eliminate section 10 from grazing rights.

I-Luke-1: A range of alternatives was developed depicting options to close areas to livestock grazing. See LG 1.3.

I-Luke, B.

Comments

Responses



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**BOB EDWARDS  
WINNEMUCCA DISTRICT RMP/EIS  
BUREAU OF LAND MANAGEMENT  
5100 E WINNEMUCCA BLVD  
WINNEMUCCA NV 89445-9909**



Fax completed form to (775) 623-1503 or mail it to the address above.

Before mailing, please fold sheet in thirds then TAPE shut the three open sides. DO NOT STAPLE

Please continue your comments here; attach additional sheets if necessary (note: total mail piece must not exceed 1 ounce to use Business Reply Mail).

*If section 10 is eliminated, Repercios  
drops to 12 linear miles & is do-able.  
Also eliminate the 100 acres of 13. Luke  
years in section 16.*

I-Luke -1  
Cont-d.



I-Luke, L.

## Comments

## Responses



lesley luke  
 <lesleyluke@abcglobal.net>  
 10/24/2010 09:27 PM

To wdrmp@blm.gov  
 cc  
 bcc  
 Subject Winnemucca District RMP, Edwards

October 24, 2010

Dear Mr. Edwards,

I have lived in Humboldt River Ranch since August 1, 1998. I support Action D-LG 1.3 in your Draft Resource Management Plan. I want cattle grazing removed from the Humboldt River Ranch subdivision, Section 10, Section 16 and all other areas surrounding HRR.

Cattle grazing in these areas results in many problems. Listed below are some of the major problems as I see them:

- 1) **Motor Vehicles Accidents** - Cattle wander on public and private roads unsupervised all day and all night.
- 2) **Destruction Of Roads And V-ditches** - Public Roads are repaired using Pershing County tax dollars. Private Roads are repaired by assessing the HRR owners.
- 3) **Destruction Of Native And Local plants**
- 4) **Pollution Around Homes And Recreation Areas** - Dead cattle are left to rot. Feces are everywhere.
- 5) **Pollution Of Private Wells**
- 6) **Inhumane Treatment Of Cattle** - I was walking on 2/20/08 at 5 PM and observed a cow sitting on a hill surrounded by 5 other cows. When I went walking on 2/21/08 at 11 AM, the cow was at the bottom of the hill making a horrible sound. I got close enough to see a baby calf's nose and tongue sticking out of the mom and it was obviously dead. I ran the 2 miles back home and called John Bell. I told him the situation and he said that he could not come. He would not put his cow out of her misery. I was irate. Such cruelty and inhumane treatment is inexcusable. I remember the exact date because it was my birthday.

Please help the residents in our subdivision and remove cattle grazing in and around Humboldt River Ranch.

Sincerely, Lesley Luke

I-Luke-1: A range of alternatives was developed depicting options to close areas to livestock grazing. See LG 1.3.

I-Luke-1

I-Lynn

**Comments**

**Responses**



"Susan Lynn"  
 <sblynn@sbcglobal.net>  
 10/21/2010 09:41 AM

To <wdrmp@blm.gov>  
 cc "Susan Lynn (work)" <sblynn@sbcglobal.net>  
 bcc  
 Subject Winnemucca District RMP & EIS comments

Comments by Susan Lynn on the Winnemucca District RMP and EIS  
 September 24, 2010

Via email

Dear RMP team:

First let me congratulate you on the organization of the document and then on the coverage of many issues and the depth of coverage. It was quite well done. What is stunning is the connectedness of the resources. When one resource is impacted, so are all the others. It seems this document strongly alludes to the connectivity. Having participated in the 1980 RMP process, I hate to point out the often severe and drastic changes that have occurred with the chipping away at the resources. We are always compromising them, one chunk at a time. Management is difficult at best with decreasing funds and staffing; enforcement rarely occurs; and the American public is busy loving its public lands into decreased quality experience or extracting resources until they are degraded to extinction. WE are not using them wisely. Everything is related to personal freedom and greed with little sense of responsibility for future generations.

With this general overview in mind, I do want to raise questions and state my general comments regarding a limited number of topics:

- Water resources
- Healthy rangelands
- The National Historic Trail
- Visual Resource Management
- ACEC's

Unfortunately, I do not have the time to go through this document page by page, so please accept my mostly general statements that are passionately felt.

1. Water Resources

Water resources are finite and are absolutely necessary for life, for healthy rangelands, for forage used by livestock and wildlife, for T&E species, for human activities and consumption and to maintain air quality. Increasingly, ground and surface water are being withdrawn from basins of origin and moved far away from the source. The BLM must actively think about the impacts to all the resources NOW as there are many projects being proposed to remove water within the District from Hualapai Valley, Granite Springs Valley, Paradise Valley, Orovada, and the Smoke Creek Desert. This extracted water will be piped to highly urbanized areas of Fernley, Reno, and Lyon and Storey Counties. Once this water leaves its basin of origin, the groundwater is

I-Lynn-9/24/10-1: Action D-WR 2.1 would prevent the export of water if it is shown to be in conflict with FLPMA.

I-Lynn-9/24/10-1



I-Lynn

**Comments****Responses**

depleted and streams, springs, seeps and wetlands cease. We cannot depend on the Nevada State Engineer to protect perennial yield. Take one look around the state and count the basins where water is OVER-appropriated. There are many. Therefore is incumbent on the BLM to protect ground and surface water sources *in situ* so that public lands can maintain a semblance of health. This includes protection of watersheds and well heads for small rural communities which this RMP seems to address satisfactorily. But this RMP does nothing to generally protect the public land experience from urban raids on water. One only needs to look to the Owens Valley, the Niobrara, Ogallala and Edwards water taps to see the damage of removing water from its source. Do we have to keep repeating our mistakes?

Water for phreatophytes is deemed to be extra water. What happens when the water used by phreatophytes is pumped away? Vegetation dies, weeds invade or not, forage production declines, animals suffer, dust storms arise and air quality declines while human and animal health suffer. The landscapes are changed! It's a long chain reaction that this RMP needs to address.

I-Lynn-  
9/24/10-2

Your goal for water resources is good but does not go far enough. "Local needs" are relative: are we talking Winnemucca and Gerlach, or are we talking the larger Reno Metro Area? Please define further.

I-Lynn-9/24/10-2:  
Comment noted.I-Lynn-  
9/24/10-3

As huge metro wells are drilled and brought into production, their cones of depression will go way beyond the State's 1000 foot protection zone and 10 year capture zone. These wells will be larger than those currently in use within the RMP boundaries. Please look at what the mine dewatering wells have done in the Winnemucca District and other districts. That's the size of well we're talking about for commercial, urban use. The impacts will be similar: Drawdowns in the 10's to 100's of feet and cones of depression spreading beyond 5 miles, and the recharge or regaining of groundwater levels taking way beyond 10 years.

I-Lynn-9/24/10-3:  
A ten year capture zone is case specific and is determined by well, pumping, and aquifer characteristics. The 1000ft demarcation is to used in the interim while ten year capture zones are defined.

THERE IS **NO** MITIGATION FOR THE LOSS OF THIS AMOUNT OF WATER, period, end of story. This RMP needs to seriously look at this resource scenario NOW. It is an emerging issue. Waiting for the next RMP in 30 years will be too late!

**2. Healthy Rangelands**

Dependent upon water, healthy rangelands are the heart and soul of public lands that supply forage and landscapes to healthy rural communities. Livestock grazing provides meat to an increasingly meat-eating world (according to NPR news). Hunters and anglers rely on healthy rangelands with streams for recreation. Tourists are looking for world-class or unusual landscapes dissimilar to their own urban experiences. T&E species demand healthy habitats.

Years ago, the first RAC's spent days and hours hashing out standards and guideline for healthy rangelands. While politicized, the recommendations were implemented and many acres of rangeland improved to some degree. Still other acres were "working towards" improvement. Perceived intervention by BLM staff on AUM's comes for the good of the land--the soil, the plants, the animals and the watersheds, and ultimately the ranchers. Grazing is perceived as a right and not a privilege--right or wrong. However the issue is still what is the greatest good for

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I-Lynn	Comments	Responses
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the land, or should be.

### **3. The California National Historic Trail**

Much of the Trail lies within the Winnemucca District. Protection of Trail remnants should remain high in all sections. While the NCA offers some protections within its boundaries, the Trail receives little protection outside where it lies within the checkerboard lands. Industrial development at Brady/Nightingale and Fernley are common examples of Trail obliteration and there is no way to prevent that. Still it would be good if development would even acknowledge the Trail's proximity, but that is a local government land use planning issue on private checkerboard lands.

There are few if any interpretive sites for the Trail outside Elko. There are certainly opportunities for interpretation anywhere along the I-80 corridor. The Trail signage along I-80 is rather pathetic, but its better than nothing.

For its time, the Trail was a major migration route. Other than the NCA and the Elko Center, there is little to commemorate this historic effort along this Trail. It is always the poor cousin, forgotten in the rush of the 21st century. It would be good to get people thinking about how they move along on an historic route--at what speed and convenience.

### **4. Visual Resource Management**

Visual Resource Management presents another major 21st century challenge. With the onset of renewable energy, water pipelines, mining and other industrial development along a major transportation artery, little will be done to protect visual landscapes. Lip service is given, but in the end there can be no enforcement and little mitigation. It's merely a check-off on a list of things to consider.

I am still deeply disappointed that the utility corridor along the south edge of the Black Rock is designated as Class IV, and along I-80 and the Trail as Class III, when really it will be Class IV. I don't think you can say that it won't. When Sempra applied for a permit to build a new coal-fired power plant right next to the Trail northwest of Gerlach, changing VRM classes was immediately contemplated. It's placement was out of context with everything around it as well as its proximity to the Trail. The same hold true for mining, and energy and water development. Visuals are impacted quite noticeably by collector systems, roads, distribution and transmission lines, well fields, disposal dumps and more. At least mining reclamation is required to recontour. Mitigation is simply unavailable. Calling for mitigation is impossible. A natural landscape obliterated is just that. How do you improve something else unrelated to what you're destroying? Once the visual landscape is changed, there is no going back.

I-Lynn



"Susan Lynn"  
 <sblynn@sbcglobal.net>  
 10/19/2010 02:27 PM

## Comments

To <wdrmp@blm.gov>  
 cc "Susan Lynn\work)" <sblynn@sbcglobal.net>  
 bcc  
 Subject Fw: my comments so far--still working

## Responses

Comments by Susan Lynn on the Winnemucca District RMP and EIS  
 October 19, 2010

Via email

Dear RMP team:

First let me congratulate you on the organization of the document and then on the coverage of many issues and the depth of coverage. It was quite well done. What is stunning is the connectedness of the resources that is very hard to portray, and sometimes you miss. But you tried! When one resource is impacted, so are all the others. This document seems to strongly allude to the connectivity. Having participated in the 1980-82 RMP process, I hate to point out the often severe and drastic changes that have occurred with the chipping away at the resources. We are always compromising them, one chink at a time, until there are cumulative impacts that we old-timers see over the course of years. Management is difficult at best with decreasing funds and staffing; enforcement rarely occurs; and the American public is busy loving its public lands into decreased quality experience or extracting resources until they are degraded to extinction. WE are not using them wisely. Recreational use seems to be related to personal freedom and greed with little sense of responsibility for future generations. It's all about ME and NOW!

I apologize for what must seem a general rant. The details are too many to comment on with my short time frame. With this general overview in mind, I do want to raise questions and state my general comments regarding a limited number of topics:

Water resources  
 Healthy rangelands  
 The National Historic Trail  
 Visual Resource Management  
 Special Recreation Areas

Unfortunately, I do not have the time to go through this document page by page, so please accept my mostly general statements that are passionately felt.

1. **Water Resources**

Water resources are finite and are absolutely necessary for life, for healthy rangelands, for forage used by livestock and wildlife, for T&E species, for human activities and consumption, and to maintain air quality. Increasingly, ground and surface water are being withdrawn from basins of

I-Lynn-10/19/10-1: See response to I-Lynn-9/24/10-1.

I-Lynn  
 10/19/10-1

I-Lynn

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I-Lynn-1  
Cont-d.

origin and exported far away from the source. The BLM must actively think about the impacts of water to all the resources NOW as there are many projects being proposed to remove water within the District from Hualapai Valley, Granite Springs Valley, Paradise Valley, Orovada, and the Smoke Creek Desert. And you must actively work to protect public lands from massive water exports. This extracted water will be piped to highly urbanized areas of Fernley, Reno, and Lyon and Storey Counties. Once this water leaves its basin of origin, the groundwater is depleted and streams, springs, seeps and wetlands cease.

We cannot depend on the Nevada State Engineer to protect perennial yield which is becoming an outdated concept. Perennial yield is predicated on evapotranspiration of plants. When ground and surface water are exported in the amount of perennial yield, the plants die. A new succession of weeds comes in. Please take one look around the state and count the basins where water is OVER-appropriated, including some listed above. There are many.

Water for/from phreatophytes is deemed to be extra water (see above) and yet we are trying to create carbon sinks and prevent too much climate change.. What happens when the water used by phreatophytes is pumped away? Vegetation dies, weeds invade or die, forage production declines, animals suffer, dust storms arise and air quality declines while human and animal health suffer. The landscapes are changed! It's a long chain reaction that this RMP needs to address.

Therefore is it incumbent on the BLM to protect ground and surface water sources *in situ* so that public lands can maintain a semblance of health. This includes protection of watersheds and well heads for small rural communities which this RMP seems to address satisfactorily. But this RMP does nothing to generally protect the public land experience from urban raids on water. One only needs to look to the Owens Valley, the Niobrara, Ogallala and Edwards water taps to see the damage of removing water from its source. Do we have to keep repeating our mistakes?

I-Lynn –  
10/19/10-2

Your goal for water resources is good but does not go far enough. "Local needs" are relative: are we talking Winnemucca and Gerlach, or are we talking the larger Reno Metro Area? Please define further. Your emphasis on water as a commodity to be harvested and shipped away is devastating to public lands.

I-Lynn-10/19/10-2: See response to I-Lynn-9/24/10-2.

I-Lynn-  
10/19/10-3

As huge metro wells are drilled and brought into production, their cones of depression will go way beyond the State's 1000 foot protection zone and 10 year capture zone. These wells will be larger than those currently in use within the RMP boundaries. Please look at what the mine dewatering wells have done in the Winnemucca District and other districts. That's the size of well we're talking about for urban commercial use. The impacts will be similar: drawdowns in the 10's to 100's of feet and cones of depression spreading beyond 5 miles, and the recharge or recovery of groundwater levels is taking way beyond 10 years.

I-Lynn-10/19/10-3: See response to I-Lynn-9/24/10-3.

THERE IS **NO** MITIGATION FOR THE LOSS OF THIS AMOUNT OF WATER, period, end of story. This RMP needs to seriously look at this resource scenario NOW. It is an emerging issue. Waiting for the next RMP in 30 years will be too late!

2. Healthy Rangelands

I-Lynn

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Dependent upon water, healthy rangelands are the heart and soul of public lands that supply forage and landscapes to healthy rural communities. Livestock grazing provides meat to an increasingly meat-eating world (according to NPR news). Hunters and anglers rely on healthy rangelands with streams for recreation. Tourists are looking for world-class or unusual landscapes dissimilar to their own urban experiences. T&E species demand healthy habitats.

Years ago, the first RAC's spent days and hours hashing out standards and guideline for healthy rangelands. While politicized, the recommendations were implemented and many acres of rangeland improved to some degree. Still other acres were "working towards" improvement. Perceived intervention by BLM staff on AUM's comes for the good of the land--the soil, the plants, the animals and the watersheds, and ultimately the ranchers. Grazing is perceived as a right and not a privilege--right or wrong. However the issue is still what is the greatest good for the land, or it should be.

**3. The California National Historic Trail**

Many miles of the Trail lies within the Winnemucca District. Protection of Trail remnants should remain high in all sections. While the NCA offers some protections within its boundaries, the Trail receives little protection outside where it lies within the checkerboard lands. Industrial development at Brady/Nightingale and Fernley are common examples of Trail obliteration and there is no way to prevent that. Still it would be good if development would even acknowledge the Trail's proximity, but that is a local government land use planning issue on private checkerboard lands.

There are no interpretive sites for the Trail outside Elko. There are certainly opportunities for interpretation anywhere along the I-80 corridor. The NPS Trail signage along I-80 is rather pathetic, but its better than nothing.

For its time, the Trail was a major migration route. Other than the NCA and the Elko Center, there is little to commemorate this historic effort along this Trail. It is always the poor cousin, forgotten in the rush of the 21st century. It would be good to get people thinking about how they move along on an historic route--at what speed and convenience.

**4. Visual Resource Management**

Visual Resource Management presents another major 21st century challenge. With the onset of renewable energy, water pipelines, mining and other industrial development along a major transportation artery, little will be done to protect visual landscapes. Lip service is given, but in the end there can be no enforcement and little mitigation. It's merely a check-off on a list of things to consider.

I am still deeply disappointed that the utility corridor along the south edge of the Black Rock is designated as Class IV, and along I-80 and the Trail is Class III, when really it will be Class IV. I don't think you can say that it isn't. When Semptra applied for a permit to build a new coal-fired power plant right next to the Trail northwest of Gerlach, changing VRM classes was

I-Lynn

**Comments****Responses**

immediately contemplated. It's placement was out of context with everything around it as well as its proximity to the Trail. The same hold true for mining, and energy and water development. Visuals are impacted quite noticeably by collector systems, roads, distribution and transmission lines, well fields, disposal dumps and more. At least mining reclamation is required to recontour. Mitigation is simply unavailable. Calling for mitigation is impossible. A natural landscape obliterated is just that. How do you improve something else unrelated to what you're destroying? Once the visual landscape is changed, there is no going back.

**Establishment of new Special Recreation Areas.**

I am unfamiliar with most of the Blue Wing/7 Troughs area, but my feeling is that because of its proximity to I-80 and those folks who must contribute to pollution and desecration of our public lands, it should probably be the sacrifice area IF there has to be one. Just another LARGE chip!

The Granites are a very special place and an very rugged place. Big Horn sheep and deer are prominent in the area. The aspen groves and the "tree glyphs" are wonderful. The beehive oven, an historic remnant of possible sheepherding days will surely be picked apart by heavy users. You should consider use by permit only. At least it might give you an idea of who is out there or who has been there---legally. It would be best left to responsible hunters and occasional campers who have to sign an agreement not to leave the roads and practice Leave No Trace.

I wish I had more time to go through this in detail. The extra time was helpful, however. Thank you.

And please pay attention to the water issues. The problems become irreversible at worst and expensive to correct at best. There is no mitigation for the loss of water!

Sincerely,

//s//

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I-MacDonald

Comments

Responses

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October 21, 2010

**RE: Winnemucca Draft Resource Management Plan (RMP)**

Comments submitted by:  
Cindy MacDonald  
3605 Silver Sand Court  
North Las Vegas, NV 89032

Dear Mr. Edwards:

Please accept the following input and comments for incorporation in appropriate NEPA analysis of the Winnemucca Resource Management Plan. I support Alternative C as well as incorporation of the following recommendations throughout the framework of the Environmental Impact Statement in all Alternatives and urge their establishment within the Record of Decision.

As a long time resident of Nevada, I have a long-standing interest in the preservation and protection of self-sustaining, viable free-roaming wild horse and burro herds on public lands due to their cultural, aesthetic and spiritual contributions to my outdoor experiences and consider their presence of prime importance in my wildlife viewing and explorations on public lands.

As both a citizen of the United States as well as being a supporter and member of various wild horse and burro advocate groups including but not limited to; American Horse Defense Fund, Animal Welfare Institute, The Cloud Foundation, Equine Welfare Alliance, Herd Watch, The International Society for the Protection of Mustangs and Burros, In Defense of Animals, Western Watersheds Project, and publisher of American Herds since 2007, I would like to thank you for the opportunity to participate in the management of our nation's irreplaceable resources.

Sincerely,  
Cindy MacDonald

I-MacDonald

## Comments

## Responses

**WINNEMUCCA DRAFT RESOURCE MANAGEMENT PLAN  
WILD HORSE AND BURRO MANAGEMENT**

**LEGAL MANDATES**

After review of the various alternatives presented in the Winnemucca Draft Resource Management Plan (RMP), I have found all the current alternatives so far considered regarding wild horse and burro management to be unsatisfactory for a myriad of reasons including, but not limited too, questionable compliance with the Wild Free-Roaming Horse and Burro Act, the Federal Lands Management Policy Act, the Public Rangelands Improvement Act, the National Environmental Policy Act, Code of Federal Regulations (CFR) Title 43, Part 4700, Protection, Management, and Control of Wild Free-Roaming Horses and Burros and Nevada Revised Statutes (NRS) 504.430 – 504.490.

Therefore, I would like to encourage the Winnemucca Field Office to develop and incorporate appropriate measures within the framework of the RMP in order to remedy current strategies failing to address public stewardship obligations as outlined by the legal statutes cited above.

**Federal Lands Management Policy Act (FLMPA)**

In Section 2.4, Alternatives Considered But Eliminated From Detailed Analysis, Exclusive Use or Protection, page 2-7, BLM cites their elimination of this consideration by stating, "*FLMPA mandates BLM to manage public lands for multiple use and sustained yield, so certain alternatives have been eliminated from detailed analysis....In addition, resource conditions do not warrant planning area wide prohibition of any particular use. Alternatives eliminating multiple traditional uses where resource conditions do not justify such measures are not reasonable. Each alternative considered allows for some level of support, protection, or use of all resources present in the planning area. In some instances, the alternatives analyzed in detail do include various considerations for eliminating or maximizing individual resource values or uses in specific areas where conflicts exist.*"

Based on BLMs interpretation within this text, accurate representation of the mandates of FLMPA are not wholly represented with respect to the management of wild free-roaming horses and burros and the critical habitat reserved for their preservation as outlined by the Wild Free-Roaming Horse and Burro Act.

While FLMPA does encourage management of multiple use and sustained yield by BLM in a broad based general way, exclusions and exceptions are incorporated within FLMPA that BLM has failed to apply in their development of management plans for wild horses and burros throughout all the current alternatives being considered.

Specifically, FLMPA states under Title 1, Definitions-Sec. 102. [43 U.S.C. 1701] (a) "The Congress declares that it is the policy of the United States that- (b) The policies of this Act shall become effective only as specific statutory authority for their implementation is enacted by this Act or by subsequent legislation and shall then be construed as supplemental to and not in derogation of the purposes for which public lands are administered under other provisions of law." (emphasis added)

1

I-MacDonald-1: Comment noted.

I-MacDonald-2: The BLM is required to make land use plan decisions that are consistent with laws governing the administration of public lands and with state and local plans to the maximum extent consistent with Federal law (Land Use Planning Handbook H-1601-1).

BLM is in compliance with the requirements of FLPMA and the WH&B Act with respect to proposed WH&B management alternatives. None of the proposed alternatives presented consider the permanent removal of wild horse and burro habitat or their populations.

I-MacDonald

## Comments

## Responses

I-MacDonald-2  
Cont-d

These instructions to BLM in the application of FLMPA are also strengthened and supported by additional legal mandates as outlined below.

Title 1, Section 102-(4):

"the Congress exercise its constitutional authority to withdraw or otherwise designate or dedicate Federal lands for specified purposes and that Congress delineate the extent to which the Executive may withdraw lands without legislative action;" *(emphasis added)*

Title 1, Declaration of Policy, Section 102-(7):

"goals and objectives be established by law as guidelines for public land use planning, and that the management be on the basis of multiple use and sustained yield unless otherwise specified by law." *(emphasis added)*

Title 3, Administration, Section 302. [43 U.S.C. 1732] (a):

"The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of this Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." *(emphasis added)*

Title 7, Effect on Existing Rights; Section 701. [43 U.S.C. 1701 note] (a):

"Nothing in this Act, or in any amendment made by this Act, shall be construed as terminating any valid lease, permit, patent, right-of-way, or other land use right or authorization existing on the date of approval of this Act." *(emphasis added)*

Title 7, Effect on Existing Rights; Section 701. [43 U.S.C. 1701] (f):

"Nothing in this Act shall be deemed to repeal any existing law by implication." *(emphasis added)*

Title 7, Effect on Existing Rights; Section 701. [43 U.S.C. 1701] 6 (h) states:

"All actions by the Secretary concerned under this Act shall be subject to valid existing rights." *(emphasis added)*

In relation to approved land use plans regarding wild horses and burros and areas declared by Congress to be designated for their maintenance and management, the Secretary of the Interior through BLM personnel has cited his/her authority to override federal law and Congressional mandates by citing the following FLMPA provision;

Sec. 202. [43 U.S.C. 1712] (a) "The Secretary shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands. Land use plans shall be developed for the public lands regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses."

While FLMPA mandates land use plans be developed, regardless of classification, withdrawal or designation, it specifically requires the Secretary to develop and maintain land use plans that appropriately conform to existing law.

I-MacDonald

## Comments

## Responses

I-MacDonald-2  
Cont-d

The withdrawal of public lands from any wild horse and burro use already designated by the Wild Free-Roaming Horse and Burro Act in 1971 through the revocation of its "Herd Management Area Status", as presented in some of the alternatives presented for analysis, is an inappropriate revision of pre-existing law.

The Secretary is only authorized to revise land use designations, where appropriate. This does not include deviation from a previous designated area of public land as mandated by Congress and federal law under the 1971 Act, which is to be managed for a specific purpose to ensure conformance with resource sustainability for future generations.

The proposed complete exclusion of previously designated tracts of public lands already reserved for wild horse and burro maintenance and protection is not a legal option during the land use planning process. Such actions are an abuse of authority by the Secretary, who was not granted power to usurp Congressional mandates as solidified through federal law, but was charged with the enforcement of these laws.

Finally, with respect to the BLM Winnemucca Field Offices broad based interpretation as referenced previously regarding the application of FLMPA within the planning area, multiple use mandates are defined as:

Title 1, Definitions-Section 103 [43 UUSC 1702] (c):

"The term "multiple use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output" (*emphasis added*).

Based on the definition of multiple use as outlined by federal law, the BLM staff at the Winnemucca Field Office's assertion that "*resource conditions do not warrant planning area wide prohibition of any particular use. Alternatives eliminating multiple traditional uses where resource conditions do not justify such measures are not reasonable. Each alternative considered allows for some level of support, protection, or use of all resources present in the planning area*" is in error.

Alternatives presented that consider the permanent removal of wild horse and burro habitat and their populations is neither reasonable nor supported by federal law. Instead, the BLM is required to develop alternatives for management plans that will insure long-term sustainability of this federally protected resource in order to continue to be enjoyed for future generations.

I-MacDonald

**Comments****Responses**

The state of Nevada is home to the largest population of wild free-roaming horses in the United States and the Northern Nevada area is the most productive habitat available for the purposes of sustainability and maintenance of free-roaming herds for both national and international enthusiasts.

As a result, this prime habitat is of critical importance for long-term maintenance and sustainability of animals deemed important enough to the quality of the human environment through their aesthetic, scenic, natural, recreational, scientific and historic values that the Congress of the United States created a separate and specific law mandating their protection and preservation for such purposes.

Interest in wild horse and burro viewing, protection and preservation is at an all time high, both nationally and internationally. This is especially true when one considers that opportunities to view wild horses and burros are in relatively small and isolated areas in relation to all public lands and resources held in stewardship for the American people or to that of national acreage overall.

An online survey of "wild horses" using the Google search engine on October 20, 2010, generated 2.46 million "hits". This can provide BLM with a reasonable source of information as to the amount of interest humans have in this subject.

I-MacDonald-3

The BLM has been charged with the management, maintenance and protection of resources for the benefit of all Americans, not just those within the planning area. Therefore, BLM is urged to broaden the scope of alternatives, analysis and cumulative impacts with respect to wild horses and burros due to their relatively isolated populations and limited available habitat in order to better reflect accurate assessment of their national status and compliance with federal law.

I-MacDonald-3: The BLM has revisited WH&B management actions and analysis in the FEIS/RMP.

**CUMULATIVE IMPACTS**

The following statistics are taken from the BLM's National Wild Horse and Burro Program Office and address some of the national cumulative impacts to wild horse and burro habitat and populations since the passage of the Free-Roaming Horse and Burro Act in 1971.

**Habitat**

In 2008, the BLM National Program Office reported a total of 53.5 million acres were identified in 1971 as lands to be designated for the protection and preservation of wild horse and burro herds as outlined by the requirements of PL 92-195. Of this acreage, the National Program Office reported that 42.1 million acres were managed by BLM.

Of these originally identified Herd Area acres, BLM reported only 34.3 million acres of habitat remained through site-specific land use planning processes that had granted Herd Management Area status; a cumulative loss of 19.2 million acres.

I-MacDonald

**Comments****Responses**

Over the last four decades, BLM has consistently maintained that Herd Areas identified at the passage of the 1971 Act are designations held in perpetuity in land classification status. However, in 2009 the BLM reported Herd Area acres now only totaled 51.3 million acres, a loss of over 2.2 million acres BLM is now reporting as a forty-year old "error" with no discernable or reasonable explanation for this loss yet to be reported to the public.

In 2009, the National Program Office also reported that Herd Management Acreage was now limited to 31.8 million acres, an additional loss of over 2.4 million acres of habitat and in 2010, BLM began reporting that wild horse and burro habitat is limited to only 26.6 million acres of exclusive BLM jurisdiction, an additional loss of 5.2 million acres.

Overall, since the passage of the Wild Free-Roaming Horse and Burro Act, the cumulative impacts of site-specific planning decisions have permanently impaired available habitat and populations through the elimination of over 26.9 million acres; over 50% of the original habitat deemed by Congress to be set aside for their preservation, protection and maintenance. If the current rate of loss stays as consistent, wild horse and burro populations will be completely eliminated by the year 2050.

Of the originally identified 339 Herd Areas in 1971, by 2008, BLM reported 199 retained their Herd Management Status but by 2009, this had dropped to 180 Herd Management Areas. Though BLM reports 180 Herd Management Areas are still active as of 2009, a total of 175 herds actually exist, 149 wild horse herds and 26 wild burro herds.

In Nevada, home to the largest remaining wild horse populations in the West and as such, statistics play a particularly important role in the overall scrutiny of the National Wild Horse & Burro Program as a whole.

In 2008, BLM reported a total of 22.8 million original Herd Area acres, 19.7 of which are actually under BLM jurisdiction. Of the original Herd Area acres, almost 17.5 million Herd Management Acres has been deemed suitable for wild horse and burro use and granted Herd Management Area status, almost 1.7 million of these acres are actually under BLM jurisdiction - a habitat loss of 2.2 million acres.

By 2009, BLMs reported total Herd Area acreage had dropped to just over 22.1 million original Herd Area acres, with approximately 19 million acres actually within BLM's jurisdiction and an addition 3 million acres managed by other agencies. Yet within just one year, Nevada Herd Management acreage dropped from 17.5 million acres to 15.2 million acres and this includes both BLM and all "other" agency managed lands.

Additionally, BLM is applying over 1.1 million additional acres towards Nevada's Herd Management Area acreage and status that are considered non-functioning HMAs due to a zero AML, an AML of 1 or HMAs where an AML has been established but there are no reported populations actually occurring in the HMAs.

I-MacDonald

**Comments****Responses****Populations**Wild Horses

According to BLM National Program Office records regarding the wild horse populations, approximately 17,300 wild horses were identified on public lands in 1971. After the completion of BLMs first aerial census in 1974, BLM reported approximately 42,600 horses had been identified and in 1976, BLM reported an approximate horse population of 53,300. These reported populations were then used to support amendments to the 1971 Act through the passage of the Public Rangelands Improvement Act in 1978 to limit populations through the establishment of Appropriate Management Levels (AMLs).

However, these same records reveal these reported populations either failed to accurately reflect "wild" horse status or BLM illegally allowed the removal of over 69,000 horses from public lands between 1971 and 1980.

Specifically, BLM reported that in 1974, a total of 17,165 horses (40.2%) of the horse population were "domestic" animals and claimed under private ownership clauses with only 25,501 deemed by BLM as actually "wild" and entitled to protection under the 1971 Act.

Of the 53,300 horses BLM reported on public lands in 1976, 11,023 were also privately claimed as BLM allowed their removal from public lands leaving an actual "wild" population of 42,287 animals.

With respect to current population loss, between 2004 and 2009, BLM has reduced national Appropriate Management Levels of wild horses by 2,091 animals just in the last five years, now reported at 23,663, with more reductions currently pending.

Population reductions are expected to be compounded by Secretary Salazar's October 2009 program direction of limiting wild population growth to meet "adoption demands" through the wide-spread use of fertility control and sterilization measures already being aggressively implemented with the goal of limiting national reproductive capabilities to 3,500 foals annually. In order to achieve this reproductive goal, the effective reproducing herds would equate to approximately 17,000 wild horses by assuming a standard BLM application of 20% recruitment rate.

Based on Secretary Salazar's "new direction", wild horse AMLs will effectively be cut by almost an additional 6,000 animals due to the Secretary initiating management plans to limit reproductive capabilities based on perceived historic population levels or last years adoption demands through this "backdoor" AML manipulation.

Of further concern is the Secretary ignorance and/or defiance of the ruling that federal law does not authorize the Secretary to establish AMLs based on perceived historic population levels, such as the 17,300 wild horses estimated by BLM through inferior census methods on public lands in 1971.

I-MacDonald

## Comments

## Responses

As the district court explained in Dahl v. Clark, *supra* at 595:

[T]he test as to appropriate wild horse population levels is whether such levels will achieve and maintain a thriving, ecological balance on the public lands. Nowhere in the law or regulations is BLM required to maintain any specific number of animals or to maintain populations in the numbers of animals existing at any particular time.

The district court also noted that the Act's legislative history supported the conclusion that Congress had not intended to maintain wild horses and burros at 1971 levels. This can be also be evidenced by the Congressional declaration within the framework of the Act which states, "are fast-disappearing from the American scene" at those historic estimated levels.

In 109 IBLA 112, the Interior Board of Land of Appeals clearly states that "*We interpret the term AML within the context of the statute to mean that "optimum number" of wild horses which results in a thriving natural eco-logical balance and avoids a deterioration of the range*".

These legal rulings require the Secretary of the Interior to develop management plans that maintain wild horse and burro populations based on range conditions, population dynamics information, biotic needs, grazing patterns, utilization data and suitability criteria, not "numbers" of animals set for administrative convenience or adoption demands. Therefore, the Secretary's current proposal to implement national population objectives based on adoption demands are not supported by either law or legal interpretation.

However, it does indicate the Secretary's potential abuse of authority may result in permanent impairment to wild herds and their habitat throughout the West that management plans, analysis and measures through the Winnemucca RMP process may help mitigate.

#### Burros

In 1971, BLM reported an estimated 8,045 burros found on public lands. After BLM's first aerial census in 1974, a total of 14,374 burros were estimated on Western rangelands. By 1976, BLM reported estimated wild burro populations plummeted to only 6,790 burros for no discernable or identifiable reason.

During the five-year period between 1971 and 1976, BLM reported that 207 burros were removed under private ownership clauses with an additional 2,217 removed by BLM totaling 2,424 animals. It is currently unknown what happened to over 5,100 wild burros that disappeared from BLM records.

With respect to cumulative impacts resulting from decisions of the Secretary of the Interior and the BLM, further historical information can be found in Kleppe v. New Mexico. This was the first legal challenge to the Wild Free-Roaming Horse and Burro Act with the original source that sparked the legal challenge involving the removal of wild burros by local stockman claiming their status was merely "estrays" under state livestock laws. While the stockman may have lost the legal battle, today New Mexico manages for zero wild burros.

I-MacDonald

**Comments****Responses**

According to historical herd statistics published by BLMs "A Strategy to Achieve and Manage Wild Burros At Appropriate Management Levels", June 2000, fifty-four burro herds were identified on public lands in 1971. As of 2008, only 25 herds remain, a loss of over 68% of the originally identified herds supposedly protected under the auspices of the 1971 Act.

An example of the decimation wild burro populations have experienced is found in California statistics as Southern California was once home to the largest wild burro population in the country and at the time of passage of the California Desert Conservation Area Plan in 1980, there were 19 recognized Herd Management Areas that could be managed for burros and 14 were officially designated for that purpose within the Conservation Area alone. The combined AMLs totaled 2,747 wild burros and their available habitat was 3.5 million acres.

Today, this same area has only 2 burro herds left, the Chemehuevi and Chocolate-Mule Mountains HMAs, with only 252 wild burros still allowed on less than 300k acres – a loss of over 90% of both habitat and populations.

Though BLM reports California burro herds have a statewide AML of 476, two of its non-functioning HMAs are burro herds with an AML of 97 wild burros being counted towards state totals even though no actual populations exist. California's true wild burro allowable management level is merely 379 throughout the entire state.

With respect to Nevada, only 13 "functional" herds remain (functional defined as populations existing in areas with established AMLs). Of Nevada's thirteen remaining wild burro herds, not one of them has an established AML that meets self-sustaining criteria or provides for the absolute minimum populations of 150 or more to ensure genetically viable populations as established by the best available science from one of the world's leading equine genetists, Dr. Gus Cothran.

In October 2007, the BLM in Colorado issued an order to entirely eliminate the wild horse population in the West Douglas Herd Area after revoking its Herd Management Area status in a prior land use planning document.

BLM based their decision on the following factors: 1) that the area was only capable of supporting 60 wild horses and, 2) that 60 wild horses failed to meet self-sustaining or genetically viable population criteria.

In applying BLMs same rationale that a population of 60 animals fails to meet self-sustaining or genetically viable populations, nine of Nevada's remaining burro areas are being managed with AMLs that are below the 60 animal threshold with five of these herds falling within the Winnemucca's planning area in the currently proposed RMP.

On a national level, only five burro herds have been issued AMLs that support self-sustaining viable populations of over 150 burros, all them occurring in the state of Arizona. In other words, there is only one state left in the United States that offers the interested viewing public any wild burro herds of substantial size or has ensured their long-term sustainability.

I-MacDonald

**Comments****Responses**

The national AML for wild burro herds was reported by the BLM National Program Office for 2009 as not to exceed 2,915 burros – and that includes “padding” population objectives through the application of AMLs towards areas where wild burro populations fail to exist.

Sustainable population concerns are compounded further by two additional factors. The first is the BLM’s national strategy to reduce wild populations in each Herd Management Area via removal every 4-5 years to an AML “range” that is set at merely 40% of the “high” established AML. This means the BLMs “ideal” objectives for a national population strategy is set for an annual western burro population of approximately 730 burros less than the high AML allows for. This equates to a management strategy of maintaining populations at less than 2,200 wild burros throughout the West.

BLMs management strategies and population objectives have placed wild burro populations under critical stress as well as significantly placing them in imminent danger of population crashes and inbreeding.

The second factor that compounds concerns for compliance with self-sustaining populations is wild burro reproductive rates. Generally, BLM has focused much more on wild horse reproductive rates than wild burros. Wild burros are often “lumped into” wild horse statistics without any consideration of their species and/or class separation and distinctions.

For example, in the Southern Nevada area, the BLM Las Vegas Field Office reported that a December 2007 aerial census recorded 80 adult burros but only 3 foals. This is a reproductive rate of 3.75%, far from the standard current recruitment rate of 20-25% BLM applies towards wild horse reproduction.

Combining all these factors; a 68% loss of herds identified in 1971 as supposedly protected under the auspices of the Act, the cumulative impacts of establishing site-specific AMLs that fail to support self-sustaining, genetically viable herds in all but five remaining herds, habitat loss that has in some cases exceeded 90%, a national population objective in the “best case” scenario of leaving less than 2,200 animals on the range annually throughout the West and a recruitment rate that most likely does not exceed a 10% average, the future of the American wild burro has reached critical status.

**APPROPRIATE MANAGEMENT LEVEL DETERMINATIONS**

The Winnemucca RMP should provide within its framework methods that assure wild horse and burro appropriate management levels and determinations of “excess” conform to mandates of the Act and other applicable laws as referenced throughout this document.

Specifically, the Secretary is required to maintain a current inventory of wild free-roaming horses and burros on given areas of the public lands. The purpose of such inventory shall be to: make determinations as to whether and where an overpopulation exists and whether action should be taken to remove excess animals; determine appropriate management levels of wild free-roaming horses and burros on these areas of the public lands; and determine whether appropriate management levels should be achieved by the removal or destruction of excess animals, or other options (such as sterilization, or natural controls on population levels).

9

I-MacDonald-3:

AML are determined through site specific implementation actions. A cumulative impact analysis was completed with respect to WH&B.

I-MacDonald

**Comments****Responses**

As clearly stated in this mandate, wild horse and burro appropriate management levels were not authorized as a "fixed number" now being promoted by BLM or established in the current RMP planning process but were contingent on a current relationship value between current populations and maintaining the current natural ecological balance on these given areas of public lands.

When BLM is measuring the impact of a given population on the condition of the range, numbers are secondary. The definition of an inventory is not a head count. It includes population dynamics information, biotic needs, grazing patterns and utilization data. Suitability criteria needs to be applied to carrying capacity calculations.

Furthermore, the Act requires that excess horses and burros may only be identified in those areas where an overpopulation exists, such as concentrations in particular areas of use. The Act does not authorize the harassment or capture of animals in areas where no threat to themselves or the thriving natural ecological balance does not exist.

BLMs current strategy of establishing and then relying on preset numbers defined as "AMLs" for a Herd Management Area fails to conform to the authority given to the Secretary through the language of the Act. "Excess" population determinations requires current inventory and determinations be made on a case by case basis and is limited to only those areas of public lands where an overpopulation exists, not broad based formulas established for administrative convenience that circumvents current monitoring of range conditions to make a excess population determinations.

Additionally, while BLM has traditionally established management plans for wild horses and burros based on dietary overlap with domestically managed livestock, too often management strategies have been limited to plans that failed to account for differences between the species as well as free roaming behaviors.

As such, appropriate management levels should consider "Suitability Criteria".

The Significance of "Suitability Criteria"

Applying suitability criteria to carrying capacity calculations for wild horses AML is crucial. This includes distance from water, steepness of slope, type of terrain, and elevation. In Phase I of the National Academy of Sciences field studies for wild horses, one of their findings was that HOW and WHERE wild horses graze in relation to available forage was the key to wild horse management. Wild horses and burros graze further from water, on steeper slopes, at higher elevations, and on more rugged terrain than pregnant or lactating cows. The high mobility of wild horses/burros and the immobility of cow/calf herds makes a crucial difference with regard to the impact of each on range condition. Wild horses lives in bands spaced from each other. Cows congregate within a mile of water chewing their cud. Suitability criteria showed that the amount of forage actually available to wild horses and burros is far greater than that available to cows.

I-MacDonald-4:  
Comment noted

I-MacDonald-5:  
A range of alternative management actions that address suitability to sustain healthy WH&B populations is addressed in WHB 1.8.

I-MacDonald

## Comments

## Responses

**NEVADA: 2009 WILD HORSE AND BURRO  
ANNUAL FORAGE CONSUMPTION BY AML**

Species	State AML	Annual AUM
Wild Horse	11,880	142,560 AUMs
Wild Burro	808	4,848 AUMs

Forage consumption calculations based on 1 AUM p/horse per month and 1/2 AUM p/burro p/month. 2009 Nevada AML statistics reported by BLM Wild Horse and Burro Program Website, 2009 Fiscal Year, HA and Herd Management Area Data, downloaded on 10/21/10 at: [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/wild\\_horses\\_and\\_burros/statistics\\_and\\_maps/fy\\_2009\\_ha\\_hma\\_final.Par.6745.File.dat/2009HAHMA2009statsnoAMFinalLaphalist.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/statistics_and_maps/fy_2009_ha_hma_final.Par.6745.File.dat/2009HAHMA2009statsnoAMFinalLaphalist.pdf)

Rangeland Data/Impacts

In 1990, the Government Accountability Office released a report titled, "[Rangeland Management: Improvements Needed in Federal Wild Horse Program](#)", GAO, Report RCED-90-110, August 1990. This report included a detailed analysis and review of program wide BLM policy, data and methodology for determining wild horse and burro AMLs, what constituted "excess", and impacts of wild horse and burro removals on rangeland health.

Summary findings included BLM decisions on how many animals to remove were not based on direct evidence that existing populations exceeded what the range could support, that removals were often not accompanied by reductions in livestock grazing and that, as a result, range conditions had not demonstrably improved.

A wide variety of topics were covered by the GAO including lack of data, BLM proceeding with horse removals using targets based on perceived population levels dating back to 1971 and/or recommendations from BLM advisory board members comprised largely of livestock permittees, wild horse removals not linked to range conditions, BLM being unable to provide any information demonstrating rangeland health had significantly improved because of animal removals, and that in some areas, GAO found BLM increased livestock grazing levels after it had removed wild horses, thereby negating any reduction in total forage consumption and potential for range improvement.

Finally, additional problems reported by the GAO included BLM range managers did not reduce authorized livestock grazing primarily because it believed it did not have sufficient range condition data to justify reductions, that BLM had been more concerned with the immediate needs of livestock interests or budget reductions than with ensuring the long-term health of the range

The GAO recommended a fundamental change in the agency's management approach and orientation was necessary if substantive progress was to be made, that reasonable current, solid information be developed concerning range carrying capacity data, the impacts of wild horses on range conditions, that future wild horse decisions need to be considered in the context of a broader strategy of range improvements based on accurate carrying capacity and range condition data, that wild horse removals needed to be linked to rangeland conditions, and that under the Act, animals are to be removed from the range to "restore a thriving natural ecological balance" – a condition that cannot be known without this data.

I-MacDonald

**Comments****Responses**Livestock Grazing Regulations/Analysis

In 2006, the DOI/BLM approved new livestock grazing regulations. However, two key long-time BLM employees who submitted pertinent information and data during the analysis, Bill Brookes and Eric Campbell, claimed the final analysis released to support the approval was "doctored", a "whitewash", a "crime" and "took all of our science and reversed it 180 degrees" as well as adding, "Everything I wrote was totally rewritten and watered down."

In other words, there is significant evidence that BLM is failing to comply with federal law requiring data driven decisions by issuing decisions based more on political and monetary considerations than through efforts to protect rangeland health and resources.

Wildlife

The state of Nevada, as well as across the majority of the West, has seen significantly increased populations of big game species such as mule deer (up 75% in Nevada from the turn of the century though down from an unprecedented historic high in the mid to late 1980's), elk, pronghorn antelope, and bighorn sheep.

Changes in Nevada big game populations over the last three decades include:

**NEVADA: CHANGES TO BIG GAME POPULATIONS**

<b>Species</b>	<b>Historic Population</b>		<b>2009 Population Estimate</b>	<b>Percent Change</b>
	<b>Estimate + Year</b>			
Mule Deer	135,000 (1981)		106,000	-21.4%
Elk	2,000 (1990)		10,900	+445%
Antelope	9,800 (1981)		24,500	+150%
Bighorn (All)	4,420 (1990)		9,350	+111.5%

**NEVADA: BIG GAME ANNUAL FORAGE CONSUMPTION  
ESTIMATED CHANGE**

<b>Species</b>	<b>Historic AUMs</b>	<b>Current AUMs</b>	<b>Percent Change</b>
Mule Deer	324,000 AUMs	254,000 AUMs	-21.6%
Elk	14,400 AUMs	78,480 AUMs	+445%
Antelope	23,520 AUMs	58,000 AUMs	+146%
Bighorn (All)	10,608 AUMs	22,440 AUMs	+111.5%

These increased populations are no longer monitored or included in site-specific proposals after BLM adopted new policies that fail to include population estimates, increases or thresholds in their carrying capacity calculations as they were once used to support the concept of the "thriving natural ecological balance" mandated as the benchmark for wild horse and burro management strategies, excess determinations and establishment of AMLs.

I-MacDonald

**Comments****Responses**

As big game populations have continued to significantly expand, increasing pressure has been placed on all species for available forage and resources, especially in years of drought. BLMs omissions of critical data and population threshold limits for these species are impacting rangeland health and prohibiting appropriate multiple use strategies to support all users dependent on available resources within the planning area.

**ALTERNATIVES/MANAGEMENT OPTIONS**

Based on cumulative habitat and population loss to wild horse and burro herds since 1971, the state of Nevada containing the largest remaining wild horse herds left in the United States and Northern Nevada containing some of the highest quality wild horse and burro habitat throughout the West, management options need to be considered, incorporated and invoked in the Winnemucca RMP that address many of the long-term cumulative impacts referenced throughout these comments. Management plans and strategies need to be established within the framework of the Winnemucca RMP that preserve the critical habitat and resources wild horse and burro herds need to survive as well as insuring self-sustaining viable herds will be enjoyed for their aesthetic, scenic, natural, recreational, scientific and historic contributions to the American people, both now and for future generations.

The following recommendations are submitted for incorporation and revision to the existing Alternative C presented in the Winnemucca Draft Resource Management Plan.

I-MacDonald-6a

- Include legal land descriptions for all Herd Areas and Herd Management Areas.

I-MacDonald-6b

- Review all Herd Areas within the planning area for reintroduction to Herd Management Status as required by CFR 4700.3-1. Provide a detailed analysis and reasons for previous withdrawals as well as potential mitigation measures that may reinstate wild populations on legally designated Herd Areas.

I-MacDonald-6c

- Identify wild horse and burro use areas as suitable for designation as wild horse and burro "ranges" to be devoted principally as sanctuaries for their protection and preservation as per Section 1333(a) of the Wild Free-Roaming Horse and Burro Act and 43 C.F.R 4710.3-2.

I-MacDonald-6d

- Develop Alternatives that incorporate the designation of ACECs (Areas of Critical Environmental Concern) for all remaining wild burro herds and the critical habitat and resources if necessary to insure self-sustaining genetically viable populations within the planning area as per the FLMPA, Section 202 [43 U.S.C. 1712] (a)(3) for long-term sustainability.

I-MacDonald-6e

- Identify Herd Areas, Herd Management Areas and Ranges that provide unique opportunities to develop public viewing opportunities and/or development of ecotourism based on the promotion of wild herds as well as including an analysis of potential economic benefits this would bring to local communities.

I-MacDonald-6a: The Wild Horse and Burro Act did not specify legal descriptions in the designation of the HMAs and HAs.

Several GIS layers are available to the public for downloading at:  
[http://www.blm.gov/nv/st/en/prog/more\\_programs/geographic\\_sciences/gis/geospatial\\_data.html](http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html).

I-MacDonald-6b: Comment noted.

I-MacDonald-6c: Comment noted.

I-MacDonald-6d: Wild Horses and Burros are managed in accordance with the Wild Horse and Burro Act.

I-MacDonald-6e: Comment noted.

I-MacDonald	Comments	Responses
I-MacDonald-6f	<ul style="list-style-type: none"> <li>Identify any bands or herds that use two or more Herd Management Areas to secure suitable year-long habitat and resources based on environmental conditions, migratory patterns or seasonal movement.</li> </ul>	I-MacDonald-6f Comment noted.
I-MacDonald-6g	<ul style="list-style-type: none"> <li>Base wild horse and burro resource allocations on scientific and rational principles. Incorporate suitability criteria be established within the framework of the RMP as recommended by the National Academy of Science over 30 years ago to better reflect actual use and available forage for free-roaming populations to achieve accurate appropriate management levels and "excess" determinations.</li> </ul>	I-MacDonald-6g: Comment noted.
I-MacDonald-6h	<ul style="list-style-type: none"> <li>Develop and incorporate within the framework of the RMP the methodology used to distinguish wild horse and burro impacts from livestock and other rangeland users. One potential method is to mandate monitoring and utilization levels be measured prior to the introduction of livestock in a given area order to distinguish class use and impacts.</li> </ul>	I-MacDonald-6h: Comment noted.
I-MacDonald-6i	<ul style="list-style-type: none"> <li>In all Herd Management Areas, assure management plans will provide allocations and resources adequate to maintain a minimum of 150 animals at all times on the range per individual HMA as necessary to maintain long-term genetic viability according to the best available science. This will prevent inbreeding or population crashes as required by CFR 4700.0-6(a) and to ensure that populations are being managed as an integral part of the natural systems of the public lands.</li> </ul>	I-MacDonald-6i: Comment noted.
I-MacDonald-6j	<ul style="list-style-type: none"> <li>In individual Herd Management Areas, prohibit management plans and strategies that fail to provide for self-sustaining wild horse and burro populations lower than a minimum population of 150 animals based on the concept of "genetic interchange" between bands or herds from different Herd Management Areas. The only exception to this could be if BLM can conclusively document known population interchanges by photographs or other identifiable markings of animals on a multiple and consistent long-term basis.</li> </ul>	I-MacDonald-6j: Comment noted.
I-MacDonald-6k	<ul style="list-style-type: none"> <li>If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury, invoke BLMs authority to reduce or close areas of public lands to grazing use by all or a particular kind of livestock as established by C.F.R. 4710.5 (a), with the goal of maintaining self-sustaining genetically viable wild horse and burro populations through allocations assuring resources are adequate to maintain a minimum of 150 animals at all times on the range per individual HMA.</li> </ul>	I-MacDonald-6k: The Taylor Grazing Act authorizes the use of rangelands to livestock grazing, the Wild Horse & Burro Act established HMAs and provided protection for WH&B. The Federal Land Management and Policy Act (FLPMA) mandates that the BLM administered land be managed for multiple uses. Livestock grazing and WH&B are both uses authorized to occur on BLM administered land. The RMP analyzes several proposed levels of livestock management, up to and including elimination of livestock grazing.
I-MacDonald-6l	<ul style="list-style-type: none"> <li>Prohibit the use of "blanket" management options that allow for wild horse and burro reductions without supporting data to make excess determinations, i.e., "in the absence of species specific data, equitable reductions in livestock and wild horse and/or burros authorizations will be implemented." The historical problem with the management approach of authorizing "equitable reductions" is there is no accountability or consequence to BLM if they fail to reduce the livestock portion of the projected reductions. Traditionally, BLM has removed wild horses and/or burros or reduced their population objectives while making no changes or increasing livestock authorizations shortly after applying changes exclusively to free-roaming populations.</li> </ul>	I-MacDonald-6l: Comment noted.

I-MacDonald	Comments	Responses
I-MacDonald-6m	<ul style="list-style-type: none"> <li>Prohibit the issuance of non-renewable grazing permits in any wild horse and burro Herd Area, Herd Management Area or Range in order to allow maximum long-term rangeland health due to year long grazing pressure in these designated areas.</li> </ul>	I-MacDonald-6m: Refer to D-LG 1.11.
I-MacDonald-6n	<ul style="list-style-type: none"> <li>Establish criteria within the RMP framework for incorporating periodic monitoring at "key" times to establish data on available water. This should include mandatory flow rates, water quality data, status of historic sources (in order to collect trend data on water availability) and photographic evidence to establish credibility in BLMs data.</li> </ul>	I-MacDonald-6n: BLM policy and technical references define methods for monitoring and meeting watershed, riparian, and aquatic health and functionality standards.
I-MacDonald-6o	<ul style="list-style-type: none"> <li>Various related multiple use decisions issued by the Winnemucca Field Office as well as surrounding areas indicate the potential for significant and cumulative impacts to underground aquifers and water sources due to drawdown. Incorporate provisions within the RMP that provide mitigation measures for water loss, increase available habitat, disperse consolidated grazing pressures, and insure supplemental low cost water sources are available in times of drought or harsh environmental conditions for wild horses and burros as well as other wildlife species within the planning area.</li> </ul>	I-MacDonald-6o: This action is an implementation level decision, not an RMP level decision. During the implementation level planning process a separate public involvement and NEPA analysis will be conducted.
I-MacDonald-6p	<ul style="list-style-type: none"> <li>Prohibit the use of any sterilization measures on populations that fall below the minimum genetic threshold of 150 animals or less and assure balanced gender structures to preserve natural herd behaviors and social dynamics.</li> </ul>	I-MacDonald-6p: Comment noted.
I-MacDonald-6q	<ul style="list-style-type: none"> <li>Prohibit the inclusion of foals one year and under in population inventories and calculations occurring on the range for "excess" population determinations.</li> </ul>	I-MacDonald-6q: Comment noted.
I-MacDonald-6r	<ul style="list-style-type: none"> <li>Establish population objectives and thresholds for big game species within the planning area to insure habitats support a "thriving natural ecological balance" between all species. The current policy to omit critical information on species populations, increased pressure on resource requirements and their resulting impacts fails to conform to federal law mandating scientifically sound management decisions and quality data to determine suitable habitat for all rangeland users. As public stewards, BLM needs to recognize and honor their position to preserve and protect all resources for the American people, both now and for future generations. State wildlife agencies have a vested interest in increasing big game populations to increase revenue. As such, studies, data, recommendations and management objectives may contain inherent "conflicts of interest" and biased towards the balanced management of resources on public lands.</li> </ul>	I-MacDonald-6r: Management of big game species and populations are under the jurisdiction of the Nevada Department of Wildlife (NDOW) and is outside the scope of this analysis. See section 1.6 Planning Criteria and Legislative Constraints #3. The BLM works in cooperation with NDOW in the management of big game habitat. Under a multiple-use mandate, the BLM strives to achieve a balanced management of public land resources.
I-MacDonald-6s	<ul style="list-style-type: none"> <li>Provide for public review a detailed examination and analysis of all current multiple use applications within each Herd Area and Herd Management Area within the planning area. This is to include current livestock authorizations, the percentage each allotment overlaps existing wild horse and burro areas as well as maps clearly showing the relationship and resource allocations between livestock and wild equids within the planning area. The purpose of this information is to help the public be reasonably informed as to BLMs compliance with the Act's mandate to accomplish the protection of wild free-roaming horses and burros through their consideration as an integral part of the natural system of the public lands as well as their relationships with other uses of the public and adjacent private lands as outlined in CFR 4710.3.</li> </ul>	I-MacDonald-6s: Comment noted.

I-MacDonald	Comments	Responses
I-MacDonald 6t	<ul style="list-style-type: none"> <li>With respect to wildlife impacts to critical resources required by wild horse and burro populations, provide current estimated big game populations such as elk, pronghorn, mule deer and bighorn, populations affecting the wild horse and burro areas within the planning district, reasonably foreseeable future big game population objectives for these same areas that may impact management strategies to maintain self-sustaining genetically viable herds.</li> </ul>	I-MacDonald- 6t: See response I-MacDonald-6r.
I-MacDonald-6u	<ul style="list-style-type: none"> <li>All other multiple use authorizations within Herd Areas and Herd Management Areas such as current mining, oil and gas operations as well as renewable resource projects such as solar, wind or geothermal impacting or reasonably projected to impact habitat and/or resources in the Winnemucca Herd Areas and Herd Management Areas as well as projects or proposals that can be expected to be implemented in the reasonably foreseeable future. This should include a detailed map of each Herd Area and Herd Management Area in the planning area to allow the interested public to assess the impacts of other multiple uses to wild horse and burro habitat and populations in a site-specific manner.</li> </ul>	I-MacDonald-6u-: See response I-MacDonald-6o. All Renewable Energy Plans of Developments subject to a federal action are required to be reviewed under NEPA.
I-MacDonald-6v	<ul style="list-style-type: none"> <li>Include detailed analysis of the miles, kinds and locations of fencing within each HA/HMA within the planning district. Reaffirm strict limitations on fencing in wild horse and burro Herd Areas, Herd Management Areas or Ranges in order to preserve their free-roaming behaviors and to prevent entrapment, injury, death or undue degradation of resources due to limitations on seasonal or migratory movement.</li> </ul>	BLM has furnished maps suitable for an RMP analysis. Several GIS layers are available to the public for downloading at: <a href="http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html">http://www.blm.gov/nv/st/en/prog/more_programs/geographic_sciences/gis/geospatial_data.html</a> .
I-MacDonald-6w	<ul style="list-style-type: none"> <li>Incorporate protections for predators in and around herd management areas as a management tool for low cost population control and to support the "thriving natural ecological balance".</li> </ul>	I-MacDonald-6v: WH&B management with respect to fencing is addressed in WHB 2. Herd Management Areas are addressed when multiple use proposals occur within these areas in site specific NEPA analysis. These documents are made available to the public.
I-MacDonald-6x	<ul style="list-style-type: none"> <li>Prohibit management strategies that are based on "adoption criteria" as the primary consideration. This policy fails to conform to both the intent and the mandates of the Act. Incorporate management strategies that support historical herd traits and local community values for the bands/herds.</li> </ul>	I-MacDonald-6w: See response I-MacDonald-6r.
I-MacDonald-6y	<ul style="list-style-type: none"> <li>Utilize range management to address wild horses and burros who wander across the borders of Herd Management Areas (HMAs), instead of permanently removing them.</li> </ul>	I-MacDonald-6x: Comment noted.
I-MacDonald-6z	<ul style="list-style-type: none"> <li>Removals of any kind should be rare and minimal. Other methods of management must be employed first and given a fair opportunity to succeed. If a limited removal is necessary, it must be done in a humane manner that respects horse social structure and keeps families intact.</li> </ul>	I-MacDonald 6y: Comment noted.
		I-MacDonald-6z: Comment noted.