EUREKA_013

SHOSHONE·EUREKA
RESOURCE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
FINAL

US DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BATTLE MOUNTAIN DISTRICT, NEVADA

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Nevada State Office
300 Booth Street
Reno, Nevada 89520

IN REPLY
REFER TO:

1616
(NV-060)

Dear Reader:

Enclosed for your information is the Proposed Resource Management Plan and Final Environmental Impact Statement (RMP-FEIS) for the Shoshone-Eureka Resource Area. This document analyzes the effects of implementing a multiple use resource management plan on 4.3 million acres of public land in the Shoshone-Eureka Resource Area, Battle Mountain District, Battle Mountain, Nevada.

This RMP-FEIS has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations and should be used in conjunction with the draft EIS (INT DEIS 83-40). This final document contains the summary from the draft, the proposed resource management plan, revisions and errata of the draft, written comments received during the review period, substantive comments presented at the public hearings, and responses to written and oral comments. Modifications from the draft are based on public input and comments received during the comment period.

Except for the wilderness recommendations, any part of this proposed resource management plan may be protested within 30 days from release as outlined in 43 CFR 1610.5-2. Any such protest must be in writing to the Director, Bureau of Land Management, 18th and C Streets, N.W., Washington, D.C. 20240.

Wilderness recommendations in this plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness will be prepared as required by the Bureau's Wilderness Study Policy.

We extend our thanks to those individuals and organizations who provided suggestions and comments on the draft. Your help has been invaluable in the preparation of the RMP-FEIS which will assist us to more effectively manage the public lands.

Sincerely yours,

Protest Period
Ends Feb 27, 198

Edward F. Spang
State Director, Nevada

Enclosure: Shoshone-Eureka Resource Area RMP-EIS Final

INT FEIS 84-02

PROPOSED RESOURCE MANAGEMENT PLAN

AND FINAL ENVIRONMENTAL IMPACT STATEMENT

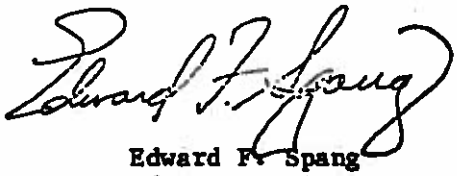
for the

SHOSHONE-EUREKA RESOURCE AREA

NEVADA

Prepared by the

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BATTLE MOUNTAIN DISTRICT



Edward F. Spang
Nevada State Director

The proposed resource management plan is a long-range plan to manage 4.3 million acres of public land within the Shoshone-Eureka Resource Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that require the Bureau of Land Management to develop land use plans for the public lands and to study the suitability of certain lands for wilderness designation. An integral environmental impact statement assesses the environmental consequences of the plan.

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

For further information contact: H. James Fox, District Manager, Bureau of Land Management, P.O. Box 1420, Battle Mountain, Nevada 89820 or telephone (702-635-5181).

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

JAN 27 1984

PREFACE

The Shoshone-Eureka Proposed Resource Management Plan and Final Environmental Impact Statement (RMP/FEIS) has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations and must be used with the Draft RMP/EIS (INT DEIS 83-40). This document contains the summary from the draft document, the proposed resource management plan, revisions and errata of the draft by chapter, written comments received during the public review process, substantive comments presented at the public hearings, and the responses to those comments.

With the exception of the wilderness recommendations, all proposals contained herein may be protested as outlined in 43 CFR, 1610.5-2. All wilderness recommendations are preliminary at this time, subject to change during administrative and legislative review. Final wilderness proposals will be published in a separate final EIS as required by the Bureau's Wilderness Study Policy.

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PURPOSE AND NEED FOR ACTION

Section 202 of the Federal Land Policy and Management Act of 1976 requires that the Secretary of the Interior shall, with public involvement, develop, maintain, and when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands. The National Environmental Policy Act of 1969 mandates that federal agencies prepare statements documenting the environmental consequences of federal actions significantly affecting the human environment. Resource managment plans qualify as significant actions and thus require the preparation of an environmental impact statement.

Section 603 of the same act requires the Secretary to review roadless areas of 5,000 acres or more in size for wilderness characteristics and report to the President his recommendations as to the suitability or nonsuitability of each such area as wilderness. Three wilderness study areas are examined in the plan.

The livestock use, wild horse use, and wildlife habitat management elements have been designed to meet the requirements of the United States District Court for the District of Columbia's decision for the case of Natural Resource Defense Council Inc., et. al., (plaintiffs) versus Cecil D. Andrus, et. al., (defendants) of April 14, 1978. Under the terms of the court order the Bureau of Land Management must prepare environmental impact statements which discuss in detail the environmental effects of livestock grazing, and alternatives thereto, on specific areas of the public lands which are or will be authorized for such use. This document combines the resource management plan and its environmental impact statement into one volume (43 CFR, 1601.7-3). The Draft document represented the draft environmental impact statement for the entire resource management plan and the draft for a legislative final environmental impact statement on the wilderness element of the plan. The final document is both the proposed resource management plan and final environmental impact statement for the plan. A separate legislative final environmental impact statement of the wilderness portion of the plan has been prepared as required by the Bureau's Wilderness Study Policy.

SUMMARY OF THE DRAFT RMP/EIS

INTRODUCTION

The Battle Mountain District of the Bureau of Land Management proposes to implement a resource management plan to guide the long-term management of the Shoshone-Eureka Resource Area. Four alternatives have been prepared for analysis purposes. A proposed resource management plan and three alternatives examine different solutions to five resource management issues identified by the public and Bureau managers during May of 1981. Each of the alternatives is multiple-use oriented and differs significantly in the balance struck among resource uses.

The proposed resource management plan was originally developed as a mid-range alternative. The mid-range alternative was modified as a result of public comment obtained during November 1982 to January 1983 in response to four preliminary alternatives. The mid-range alternative was selected by management as the proposed resource management plan because of its conformance with the planning criteria listed in Chapter 1, its practical approach to resolving the planning issues, and a thorough consideration of the environmental consequences of the alternatives.

An environmental impact statement that analyzes the significant environmental impacts which would result if each alternative were implemented, is an integral part of this document.

PLANNING ISSUES

The following five resource management issues are addressed in the proposed resource management plan and the alternatives.

1. Which wilderness study areas or portions of wilderness study areas, if any, are suitable for recommendation to Congress for wilderness designation?

2. What land tenure adjustments are needed?

3. What areas are suitable for utility corridors?

4. What areas should be managed for woodland products such as firewood, pine nuts, Christmas trees, and fence posts?

5. How should the resource area be managed for livestock use, wild horse use, and wildlife habitat?

RESOURCE CONFLICT AREAS

In order to facilitate project level planning and impact assessment, the resource area has been divided into four resource conflict areas. Each resource conflict area has a unique set of resources that warrants specific management considerations.

ALTERNATIVES CONSIDERED

The Proposed Resource Management Plan

Through implementation of the proposed alternative, the Bureau of Land Management would seek to obtain a balance between economic uses of the public lands and environmental protection.

Under this alternative, 82,600 acres in the Antelope (NV-060-231/241) wilderness study area, 500 acres adjacent to the Antelope wilderness study area, and all 15,090 acres within the Roberts (NV-060-541) wilderness study area would be recommended for wilderness designation

All 49,676 acres within the Simpson Park wilderness study area (NV-060-428) and 4,800 acres within the Antelope wilderness study area would be recommended as nonsuitable for wilderness designation. These recommendations are preliminary and subject to change during administrative review.

A pool of 104,959 acres of public land would be identified for disposal. In addition to the pool, up to 13,440 acres of public lands, suitable for agricultural purposes within specified valleys, would be disposed of within 15 years.

Under this alternative, 112 miles of utility corridors, which include existing transmission lines, would be designated. One hundred sixty-seven miles of planning corridors would be identified. Designation and identification of corridors would form a basic east-west and north-south network.

All 600,000 acres of woodland area suitable for management would be available for public noncommercial use. Eighty-three percent of this area would also be managed for commercial harvest of firewood, juniper posts, and Christmas trees. Eighty percent of the area suitable for noncommercial public cutting would also be managed for commercial harvest of pinyon pine nuts, while the remaining twenty percent would only be available for noncommercial harvest by Nevada Indians and all other members of the public.

The proposed plan proposes to continue existing livestock, wild horse, and big game wildlife use during the short term. Vegetation monitoring data and other information collected would be used to determine what adjustments, if any, would be needed to improve the condition of the rangeland.

Rangeland improvement projects would be oriented towards increasing the amount of vegetation available for consumption in the long term while protecting sensitive resource values.

Wildlife habitat improvement projects would be oriented toward protecting and improving riparian habitat and providing suitable habitat for reasonable numbers of big game animals.

The Resource Protection Alternative

Under the resource protection alternative, the Bureau would emphasize the protection and preservation of sensitive resource values.

All three wilderness study areas (Antelope, Roberts, and Simpson Park) containing a total of 152,160 acres would be preliminarily recommended for wilderness designation.

A pool of 27,929 acres of public land would be identified for disposal. In addition to the pool, up to 13,440 acres of public land suitable for agricultural purposes within specified valleys would be disposed of within 15 years.

Utility corridors would be designated along 112 miles of existing transmission lines.

All 600,000 acres of woodland area suitable for management would be made available for public noncommercial use. Twenty-five percent of this area would also be managed for commercial harvest of firewood, juniper posts and Christmas trees. Eighteen percent of the area managed for noncommercial cutting would be available for commercial harvest of pinyon pine nuts and the remainder would be available to noncommercial

Draft Shoshone-Eureka Resource Management Plan

Table S-1 Comparative Review of the Environmental Consequences of the Alternatives by Affected Environmental Component

ENVIRONMENTAL COMPONENT	MEASUREMENT PARAMETER	PREFERRED ALTERNATIVE
LAND OWNERSHIP	Acres disposed (%)[1/]	58,440(1%)
WOODLANDS	Acres harvested (%)[2/]	11,250(2%)
	Acres of harvest base removed	11,300(2%)(SA)[3/]
	Availability of woodland products public demand would be met	Yes
WILDLIFE	Riparian habitat condition (acres)(% change)[4/] projected long term	
	Poor	1,050(-15%)(SB)
	Fair	870(-4%)
	Good[5/]	2,640(+11%)(SB)
	Aquatic habitat condition (miles of streams) (% change)[4/] projected long term	
	Poor	44.8(-1%)
	Fair	29.2(-38%)
	Good[5/]	85.0(+39%)(SB)
	Animal unit months for reasonable numbers of big game animals (mule deer and pronghorn antelope) would be available (% change)[4/]	yes, in long term (+33%) (SB)
WILD HORSES	Number of animals in the short term (% change)[4/]	3,660(0%)
LIVESTOCK GRAZING	Availability of forage (animal unit months)	
	current use/5-year average licensed use	239,717
	projected short term (% change)[4/]	246,933(+3%)
	projected long term (% change)[4/]	266,244(+11%)(SB)
VEGETATION	Long-term change[4/] in ecological condition (%)	+9
	Long-term change[4/] in vegetation trend (%)	+12(SB)

RESOURCE PROTECTION ALTERNATIVE	ECONOMIC DEVELOPMENT ALTERNATIVE	NO ACTION ALTERNATIVE
17,640 (0.4%)	83,940 (2%)	0
6,750 (1%)	12,750 (2%)	2,625 (0.4%)
10,800 (2%)(SA)	10,000 (2%)(SA)	0
Yes	Yes	No (SA)
690(-23%)(SB)	2,060 (+7%)	3,210 (+32%)(SA)
1,010 (+7%)	820 (+3%)	1,130 (+10%)
2,860(+16%)(SB)	1,680 (-10%)(SA)	220 (-42%)(SA)
45.1 (-1%)	95.0 (+30%)(SA)	144.9 (+61%)(SA)
26.2 (-40%)	28.8 (-38%)	11.2 (-49%)
87.7(+41%)(SB)	35.2 (+8%)	2.9 (-12%)(SA)
Yes, in short and long term (+33%)(SB)	No (SA)	No (SA)
4,300 (+17%)(SB)	1,100 (-70%)(SA)	3,660 (0%)
239,717	239,717	239,712
203,021(-15%)(SA)	279,499 (+17%)(SB)	No change
217,501 (-9%)	303,680 (+27%)(SB)	No change
+19 (SB)	+9	-15 (SA)
+16 (SB)	+11 (SB)	-14 (SA)

Table S-1 Comparative Review of the Environmental Consequences of the Alternatives by Affected Environmental Component (continued)

ENVIRONMENTAL COMPONENT	MEASUREMENT PARAMETER	PREFERRED ALTERNATIVE
CULTURAL RESOURCES	Potential sites protected ,	1,382
	Potential sites disturbed	1,266 (SA)
WILDERNESS	Acres protected	98,190 (SB)
	Acres not protected	54,470 (SA)
RECREATION	Hunter days (% change)[4/]	
	short term	18,200 (+9%)
	long term	21,900 (+33%)(SB)
	Primitive vehicle ways closed (miles)	11.5
MINERAL EXPLORATION AND DEVELOPMENT	Acres restricted due to wilderness recommendations	98,690 (SA)
ENERGY AND UTLITIES	Bulk transfer of energy	The proposed network of corridors would satisfy all expected needs for transmission facilities during the life of the plan. (SB)

Source: Shoshone-Eureka planning team estimates

1/ Portion of total public land (4.3 million acres) within the resource area
2/ Portion of total woodland harvest base (600,000 acres)
3/ SB = significant beneficial impact
SA = significant adverse impact
4/ Percent change from existing situation
5/ Threshold is good or better condition. Some areas included in good condition class may actually be in excellent condition.
6/ The Simpson Park Wilderness Study Area would be recommended as suitable for wilderness designation but is not considered to be manageable as wilderness over the long term.

RESOURCE PROTECTION ALTERNATIVE	ECONOMIC DEVELOPMENT ALTERNATIVE	NO ACTION ALTERNATIVE
2,154	1,167	0
309 (SA)	1,572 (SA)	38 (SA)
152,160 (SB)[6/]	82,600 (SB)	0
0	69,560 (SA)	152,160 (SA)
21,900(+25%)(SB)	17,600 (+6%)	
21,900(+25%)(SB)	18,800 (+14%)(SB)	12,300 (-25%) (SA)
49	9	0
152,160 (SA)	82,600 (SA)	0
The proposed network of corridors would limit construction of new utilities to existing routes and not provide a north-south route for potential utilities.	The network of corridors proposed would provide for the establishment of utilities along all of the routes identified in the Western Regional Corridor Study. (SB)	Lack of designated corridors would hinder planning efforts of utility companies contemplating construction of major transmission utilities through Nevada. (SA)

THE PROPOSED RESOURCE MANAGEMENT PLAN

The proposed resource management plan is essentially the same as the preferred alternative of the Draft RMP/EIS. On a few cases there have been changes in wording to clarify some of the proposed management actions and implementation procedures.

THEME OF THE PROPOSED RESOURCE MANAGEMENT PLAN

Through implementation of the proposed resource management plan, the Bureau of Land Management would seek to obtain a balance between economic uses of the public lands and environmental protection. As mandated by law, the bureau would continue to protect certain resource values such as threatened or endangered species and cultural resources.

The subsequent sections describe the objectives that the bureau would pursue to resolve the management issues under this alternative. The objectives are followed by the specific management actions that would be implemented to achieve the objectives. The management actions by resource conflict area for the proposed resource management plan are shown on Table 2-2.

WILDERNESS

Objectives

To recommend wilderness designation for those wilderness study areas where the values of wilderness designation are capable of balancing the other resource values and uses which would be foregone due to wilderness designation.

To recommend wilderness designation only for those wilderness study areas that can be effectively managed as wilderness over the long term.

Management Actions

1) Recommend 82,600 acres of the Antelope wilderness study area, 500 acres adjacent to the Antelope wilderness study area, and all 15,090 acres of the Roberts wilderness study area suitable for wilderness designation as shown on Map 2-1.

The northern boundary of the Antelope wilderness study area currently runs along a township line. The inclusion of 500 acres contiguous with the northern boundary of the wilderness study area would enhance manageability by providing a boundary that would be recognizable on the ground.

2) Recommend all 49,670 acres within the Simpson Park wilderness study area and 4,800 acres within the Antelope wilderness study area as nonsuitable for wilderness designation as shown on Map 2-1.

The Simpson Park wilderness study area would not be recommended because of manageability and minerals considerations.

Deletion of the 4,800-acre section within the Antelope area would eliminate a large number of human imprints. These recommendations are preliminary and subject to change during administrative review.

LAND TENURE ADUSTMENTS

Objectives

To increase opportunities for economic development by moderately increasing the amount of privately-owned land within the resource area consistent with the other objectives of this alternative.

To adjust the land tenure pattern through disposals requested by private citizens consistent with the other objectives of the alternative.

Management Actions

1) Identify a pool of approximately 104,959 acres of public land which meets preliminary disposal criteria. These lands are shown on Map 2-1. Disposal would meet needs for recreation or other public purposes, community expansion, economic development, agriculture, and for the creation of blocked-ownership patterns which would result in improved land management.

Livestock grazing preference would be adjusted as appropriate subsequent to actual land disposal. Table 2-2 shows the number of acres identified in the disposal pool by resource conflict area. The legal descriptions of the lands identified for disposal by alternative are available upon request from the Battle Mountain District Office.

2) Dispose of up to 13,440 acres (not included in pool under number 1) of public land suitable for agricultural purposes within 15 years in Grass, Kobeh, Antelope, Monitor, Fish Creek, Little Smoky, Big Smoky, Upper Reese River, and Smith Creek valleys.

UTILITY CORRIDORS

Objectives

To ensure a system for transmission of utilities through the resource area by establishing an east-west and north-south network of utility corridors.

To minimize adverse impacts to the environment by concentrating compatible rights-of-way in designated corridors that avoid sensitive resource values.

Management Actions

1) Designate 112 miles of utility corridors which include existing transmission lines and identify 167 miles of planning corridors as shown on Map 2-1:

A) O-P, a corridor southeast of Battle Mountain along Interstate 80 which would include the telephone right-of-way;

B) L-K-J-north W-T-F or L-K-J-south W-T-F, a corridor including the existing 230 kV powerline right-of-way. From point W west to K, excluding lands administered by the Toiyabe National Forest, the southern limit of the corridor would be 3/4 mile south of the existing 220 kV line.

C) J-D, a corridor including the existing 230 Kv powerline right-of-way through Big Smoky Valley. The corridor would not include lands in the Toiyabe National Forest;

D) O-R-K, a corridor for future utilities between Battle Mountain and Austin through Reese River Valley. From a point north of where the Reese River passes through the Shoshone Range south to Austin, the corridor would remain at least one mile east of State Highway 305.

E) M-R, a corridor for future utilities linking the geothermal area in Dixie Valley to the Battle Mountain to Austin corridor;

F) N-R, a corridor for future utilities linking the Valmy powerline to the Battle Mountain to Austin corridor; and

G) K-C, a corridor for future utilities passing through Smith Creek and Ione valleys.

Designation and identification of these corridors would establish a basic network of north-south and east-west utility corridors through the resource area and would include all existing transmission systems. The miles of corridor proposed is summarized in Table 2-2 by resource conflict area.

WOODLANDS

Objectives

To manage suitable forested lands for optimum production of woodland products on a sustained-yield basis, while protecting sensitive values.

To maintain, where necessary for management, those access routes currently servicing pinyon-juniper harvest areas.

To set aside certain historical pinyon-juniper woodland areas for noncommercial pine nut gathering by Nevada Indians and all other members of the public.

Management Actions

1) Manage approximately 600,000 acres of pinyon-juniper woodland for noncommercial sustained-yield production of woodland products.

2) Manage approximately 500,000 acres of pinyon-juniper woodland for commercial harvest of woodland products. This acreage represents 83 percent of the area designated for noncommercial use. Table 2-2 summarizes the acres of woodland that would be available for noncommercial and commercial use by resource conflict area.

Commercial sales of firewood, juniper posts, and Christmas trees would be restricted near population centers and major access routes. Heavily-used access routes would be maintained annually if funding permits. Only selective cutting of mature and overmature trees would be allowed in firewood cutting units.

Manage approximately 480,000 acres of pinyon-juniper woodland shown on Map 2-5 for commercial harvest of pinyon pine nuts. This acreage represents 80 percent of the area designated for noncommercial use. The remaining 20 percent would be managed for noncommercial gathering by Nevada Indians and all other members of the public. Pine nuts in commercial sale units would be offered for competitive sale annually on an as-available basis.

3) Develop forest management plans for all pinyon-juniper areas capable of sustained-yield production of woodland products.

LIVESTOCK USE, WILD HORSE USE, AND WILDLIFE HABITAT MANAGEMENT

Objectives

To initially manage livestock use at existing levels and determine if such use can be maintained.

To establish a grazing management program designed to provide key forage plants with adequate rest from grazing during critical growth periods.

To achieve, through management of the livestock and wild horses, utilization levels consistent with those recommended by the 1981 Nevada Range Studies Task Group to allow more plants to complete growth cycles and to increase storage of reserves for future growth.

To increase vegetation production while protecting sensitive resource values.

To manage viable herds of sound, healthy wild horses in a wild and free-roaming state.

To initially manage wild horse populations at existing numbers based on 1982 aerial counts and determine if this level of use can be maintained.

To manage wild horses within the areas which constituted their habitat at the time the Wild and Free-roaming Horse and Burro Act became law in 1971.

To maintain and improve wildlife habitat and to reduce habitat conflicts while providing for other appropriate resource uses.

To improve selected riparian and stream habitat to good or better condition.

To provide habitat sufficient to allow big game populations to achieve reasonable numbers in the long term.

To improve and maintain habitat for state-listed sensitive species and federally-listed threatened or endangered species.

Short-Term Management Actions

1) Authorize livestock use up to active preference upon request. However, based on past permittee requests, initial licensed use is expected to be similar to the five-year average use level of 239,717 animal unit months. Using the five-year average licensed use level as existing use and considering additional animal unit months available as a result of allotment management plans and range improvement projects, it is estimated that authorized use will be 246,933 animal unit months. This level is 18 percent below active perference. The change would be an increase of 7,216 animal unit months above the five-year (1977-1981) average licensed use level. The five-year average use in animal unit months is given in Table 2-2 for each resource conflict area.

2) Manage wild horse use at exising numbers in 14 use areas. For analysis purposes this is 43,512 animal unit mohnths for 3,660 animals, based on surveys conducted in 1982. Map 2-4 shows the location of the wild horse herd use areas that would be established. Table 2-2 shows the 1982 numbers of wild horses in each resource conflict area.

3) Manage wildlife habitat initially to provide for present numbers of big game animals (mule deer and pronghorn antelope). Table 2-2

gives the bureau's estimate of existing demand, based on 1982 data, for vegetation by big game in each resource conflict area.

4) Continue existing rangeland monitoring studies and establish new studies as necessary to determine what adjustments in livestock use and wild horse numbers are needed to meet the objectives of the alternative.

5) Implement allotment management plans on five allotments in the "improve" category (see the Implementation section of the chapter for an explanation of the allotment categorization process).

The projects needed to support these plans are described below and shown in Table 2-2.

Drill four wells to provide water in areas where there are no other sources of available water. The additional water would be made available to livestock, wildlife, and wild horses to encourage more even utilization of vegetation.

Develop 22 springs to promote better distribution of livestock for more even utilization of vegetation. This action would include the installation of 36 miles of pipeline and 56 water troughs.

Construct 103 miles of fence to foster better distribution of livestock for more even utilization of vegetation. This action would include installation of 17 cattle guards.

Manipulate 18,000 acres of vegetation by plowing, burning, spraying and seeding, or reseeding, to increase available forage for livestock and big game and improve water infiltration and holding capacity. The areas would be fenced to allow establishment of the seeded species.

6) Implement wild horse herd management area plans in the following herd use areas which include 6 "improve" category allotments: New Pass-Ravenswood, Bald Mountain, and Fish Creek.

Construct six water developments to benefit wild horses.

7) Continue implementation of the Roberts Mountain habitat management plan and develop plans for the following areas: Simpson Park, Diamond Mountains, and Mt. Callaghan. The projects needed in support of all of these and other activity plans are described below and shown in Table 2-2.

Improve and maintain at good or better condition aquatic and riparian habitat on 36 miles of streams.

Improve and maintain in good or better condition approximately 400 acres of meadows, springs, and aspen groves in wildlife habitat management plan and allotment management plan areas.

Establish and fence 1,000 acres of primarily browse seeding to benefit wildlife, particularly wintering mule deer.

Conduct prescribed burns on 1,000 acres to diversify wildlife habitat and improve mule deer and sage grouse habitat.

Construct six guzzlers and two pipe lines with troughs to provide dependable water for wildlife.

Manage habitat to support release by the Nevada Department of Wildlife of approximately 200 pronghorn antelope

to supplement existing low populations in the Bates Mountain area and the Rocky Hills area of the Simpson Park Range.

Manage aquatic habitat to support reintroduction of Lahontan cutthroat trout by the Nevada Department of Wildlife into streams identified as historic habitat.

Long-Term Management Actions

In the long term, the monitoring program would provide data on which to base adjustments. All adjustments would be designed to achieve the objectives of the alternative. The provision of vegetation for reasonable numbers of big game wildlife would be a long-term objective.

It is expected that a total of ten additional livestock grazing allotment management plans, as well as additional wild horse herd management plans, and wildlife habitat management area plans would be implemented by the end of the long term. Grazing treatments, of the type described in Appendix A, would be initiated in some allotments where monitoring data identifies a need. More on-the-ground actions such as vegetation manipulation projects, water developments, and boundary and pasture fences would be developed to meet the objectives of the alternative.

Table 2-2 KEY MANAGEMENT ACTIONS OF THE PROPOSED RESOURCE MANAGEMENT PLAN BY RESOURCE CONFLICT AREA

ISSUE/Action	South Shoshone RCA[1]	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone-Eureka Resource Area
WILDERNESS: Suitable (acres)	N/A	N/A	Antelope WSA[2] (82,600); non WSA adjacent to Antelope (500); Roberts WSA (15,090)	N/A	98,190 acres (2.2% of Resource Area)
Nonsuitable (acres)	N/A	N/A	Antelope WSA (4,800); Simpson Park WSA (49,670)	N/A	54,470 acres
LANDS: Identify pool of lands for disposal	59,563 acres	13,397 acres	27,398 acres	4,601 acres	104,959 acres
Dispose of agricultural lands (not included in pool)	1,600 acres	0	6,720 acres	5,120 acres	13,440 acres
UTILITY CORRIDORS: Designate and/or identify miles of corridors	116 miles	44 miles	63 miles	56 miles	279 miles
WOODLANDS: Acres available for noncommercial harvest	120,000 acres	9,000 acres	431,000 acres	40,000 acres	600,000 acres
Acres available for commercial harvest of firewood, posts, and Christmas trees	100,000 acres	0	364,000 acres	36,000 acres	500,000 acres[4]
Acres available for commercial pine nut harvest	80,000 acres	0	364,000 acres	36,000 acres	480,000 acres[4]
LIVESTOCK: Licensed use as a result of short term livestock actions and actions of other resource programs	93,043	16,276	112,459	25,155	246,933
Initial level of use (5-year average licensed use)[5] [3]	90,236	16,355	107,942	25,184	239,717
Number of allotment management plans	3	0	2	0	5
Number of water developments	10	0	16	0	26
Miles of fence	46	0	57	0	103
Acres of vegetation manipulation	7,500	0	10,500	0	18,000
Cost of livestock improvement projects ($)	545,000	0	750,000	0	1,295,000

Table 2-2 KEY MANAGEMENT ACTIONS OF THE PROPOSED RESOURCE MANAGEMENT PLAN BY RESOURCE CONFLICT AREA (continued)

ISSUE/Action	South Shoshone RCA[1]	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone-Eureka Resource Area
WILD HORSES:[3] Level of use (1982 use for short term, then adjust as necessary)[5]	24,396	N/A	16,086	3,030	43,512
horses	2,033		1,347	280	3,660
Number of herd management area plans	2	0	1	0	3
Number of water developments	4	N/A	2	0	6
Cost of horse habitat improvement projects ($)	10,000	N/A	5,000	0	15,000
WILDLIFE:[3] Level of use (existing use for short term with reasonable numbers as long-term objective)					
animal unit months (short term)	4,207	2,251	17,136	2,647	26,241
animal unit months (long term)	5,904	3,191	21,727	4,158	34,980
Number of habitat management plans	1	0	3	0	4
Improve miles of streams	30	0	6	0	36
Improve acres of riparian habitat	500	0	340	0	840
Number of guzzlers installed	3	0	3	0	6
Number of spring developments	0	0	2	0	2
Acres of seedings	0	0	1,000	0	1,000
Acres of burns	0	0	1,000	0	1,000
Provision of habitat for wildlife releases	Lahontan Cutthroat trout	0	Pronghorn Antelope and Lahontan Cutthroat trout	0	Lahontan Cutthroat trout and Pronghorn Antelope
Cost of wildlife habitat improvement projects ($)	115,000	0	80,000	0	195,000

1/ resource conflict area
2/ wilderness study area
3/ use levels and project numbers for livestock, wild horses, and wildlife are values for the short term
4/ included in 600,000 acres listed above
5/ animal unit months

IMPLEMENTATION OF THE RESOURCE MANAGEMENT PLAN

INTRODUCTION

The proposed resource management plan is the Battle Mountain district's selection of the way public lands will be managed in the Shoshone-Eureka Resource Area. The proposed plan was developed based on public comment and is composed of the preferred alternative and selected parts of the other alternatives in the Draft RMP/EIS. After publication of the final environmental impact statement, management decisions will be documented in a record of decision published in the Federal Register.

The resource management plan will be implemented through activity plans such as allotment management plans, wildlife habitat management plans, wild horse herd management area plans, and woodland area management plans. These plans will identify such details as the grazing system to be used in an allotment management plan, the location of range improvements for the benefit of livestock, wild horses and wildlife, and location of woodland product harvest areas. The management actions developed for these plans will be integrated into a total management program designed to assure progress towards meeting the objectives of the resource management plan. Additional implementation guidelines that apply to the alternatives are discussed below.

Implementation of the resource management plan will take place through coordination, consultation, and cooperation. Coordinated resource management and planning is an advisory process that brings together all interests concerned with the management of resources in a given local area (landowners, land management agencies, wildlife groups, wild horse groups, and conservation organizations) and is the recommended public process through which consultation and coordination will take place. Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies, consultation and coordination, inventory, or a combination of these sources.

WILDERNESS

All wilderness study areas will continue to be protected under the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review. Wilderness recommendations made in the final environmental impact statement for the resource management plan are preliminary and subject to change during administrative review. A separate final legislative environmental impact statement has been prepared for the wilderness study recommendations. A wilderness study report has also been written that addresses each area individually. After review of these documents, the Director of the Bureau of Land Management will request mineral surveys by the United States Geological Survey and Bureau of Mines for each area recommended as preliminarily suitable. The Federal Land Policy and Management Act of 1976 requires the Secretary of the Interior to review areas of the public lands determined to have wilderness characteristics, and to report to the President by October 21, 1991 his recommendations as to the suitability or nonsuitability of each such area for preservation as wilderness. The President is

required to report his recommendations to Congress by October 21, 1993. Areas designated as wilderness by Congress will be managed under the Bureau's Wilderness Management Policy. Areas designated as wilderness will be designated "closed" to off-road vehicles under the authority of executive order numbers 11644 and 11989 and the Wilderness Act of 1964 except if such use takes place as part of a valid existing right or if authorized in the wilderness management plan for the area.

LAND TENURE ADJUSTMENTS

All land disposal actions proposed are discretionary. Actual disposal could be at the initiative of the bureau or in response to expressions of interest from non-bureau individuals and entities. Proposed land tenure adjustments will be evaluated through the environmental analysis process to determine if the action is consistent with the objectives of the plan. The decision to dispose of a particular parcel will consider conflicts identified in required cultural resource and mineral reports. Unsurveyed lands will be surveyed prior to disposal.

UTILITY CORRIDORS

Utility corridors which include existing transmission lines will be designated. Planning corridors will be identified where no transmission lines exist. Designation and identification of corridors will follow bureau procedures and will be made on a point-to-point basis within specified valleys. The actual route will be established after environmental analysis is completed for the right-of-way. Each corridor will be three miles wide to provide opportunities for multiple transmission facilities and selection of routes that minimize environmental degradation in a cost-effective manner. Where utility lines are in existence, the width of the corridor will encompass existing rights-of-way and be located to avoid sensitive resources where appropriate. Applicants for use of a corridor will be required to locate new facilities proximate to existing facilities except where considerations of construction feasibility, cost, compatibility, resource protection or safety are over-riding.

WOODLANDS

Woodland management plans for the resource area will be completed within five years. The plans will define the allowable cut and management strategy to be carried out in each unit.

Harvest of trees for firewood, juniper posts, and Christmas trees will be permitted from special cutting units within designated areas. These units will be rotated from one area to another as management objectives are met. Noncommercial public harvest of pinyon pine nuts will not be restricted to specific areas.

Harvest will be restricted to slopes less than 30 percent.

LIVESTOCK USE, WILD HORSE USE, AND WILDLIFE HABITAT MANAGEMENT

Wild Horses

The management of wild horses will be coordinated through wild horse herd management area plans. Wild horses will not be maintained outside of 1971 use areas. While it is recognized that some wild horses may drift outside these areas, management will be designed to minimize such drift. Adjustments in wild horse numbers will be based on monitoring data and/or CRMP recommendations.

Wildlife

The development of wildlife habitat improvement projects will be guided by wildlife habitat management plans. The development of plans will be closely coordinated with the implementation of allotment management plans to meet the objectives of both programs. Wildlife habitat management plans will address four major themes: management of crucial habitats to provide for threatened, endangered, or sensitive species where present; management of big game ranges to provide habitat for reasonable numbers of animals over the long term; improvement of riparian, wetland, and aquatic habitats; and management of other habitats to meet needs of upland game and nongame animals.

Riparian and aquatic habitat improvement measures could include managing livestock through grazing systems consistent with maintaining riparian vegetation in optimum condition, pasture fencing, or fencing areas to exclude livestock and wild horses. Whether to use protective fencing, grazing systems, some other appropriate measure, or a combination of methods will be determined on an individual basis for each stream or riparian area.

Any exclosure fences will be constructed parallel to the streams and be designed to assure access to water for wildlife, wild horses, and livestock at least every one-half mile either by constructing water gaps or pipelines to troughs outside the riparian zones. In most cases when a fenced area is improved to good condition, it would be reopened to livestock and wild horse use consistent with maintaining the good condition.

Livestock

Livestock grazing allotment management plans will include one or more of the grazing treatments described in Appendix A. The grazing treatments will be designed to provide forage for consumptive use while maintaining proper and judicious use levels for key forage species.

The development of livestock grazing management procedures and projects will be coordinated through allotment management plans following the selective management policy described in the introduction section of this chapter. All projects are based upon estimated needs. The allotment management plans would determine the precise location and mixture of projects needed to meet management objectives.

Specific Implementation Procedures

A rangeland program summary will be issued within five months of the completion date of the Resource Management Plan to inform livestock grazing permittees and interested publics about the implementation of the rangeland management program.

The Rangeland Program Summary explains the procedure involved in establishing initial and subsequent levels of livestock grazing use. Grazing decisions and agreements will be issued as part of the Rangeland Program Summary and will include initial livestock grazing use levels and will identify the data needed and the procedures to be used in determining future adjustments.

Range management actions for livestock use and wild horse numbers will be based upon data obtained through the monitoring program and

will consider recommendations made through the coordinated resource management and planning process. Actions could include, but will not be limited to, change in seasons-of-use, change in livestock numbers, correction of livestock distribution problems, alteration of the number of wild horses, development of range improvements, and taking site-specific measures to achieve improvements in wildlife habitat.

The implementation strategy for the management actions identified in Table 2-5 related to livestock grazing allotments will be dependent on, and prioritized according to, the selective management category of the allotments.

SELECTIVE MANAGEMENT

It is the policy of the Bureau of Land Management to address rangeland management problems through a selective management approach. The bureau has developed three categories into which allotments will be grouped according to their resource needs and potential for improvement. The names and objectives of the three categories are: 1) maintain the current satisfactory condition; 2) improve the current unsatisfactory condition; and 3) manage in a custodial fashion.

The implementation of intensive grazing management will be accomplished through livestock grazing allotment management plans. Allotments in the "improve" category will be given first priority for development of plans to resolve identified problems. All range improvement projects proposed in this document are for "improve" category allotments. Second priority for livestock grazing allotment management plan development will be given to "maintain" category allotments and third priority will be assigned to "custodial" category allotments. Although range improvements are not proposed on second and third priority allotments in this resource management plan, some minor rangeland improvements may be developed as the need arises.

Table 2-5 Priority of Implementation Action by Allotment Selective Management Category

Management Action	Priority by Allotment Selective Management Category		
	Maintain	Improve	Custodial
Fund rangeland improvements with appropriated funds	2	1	3
Develop allotment management plans	2	1	3
Use Supervision	3	1	2

32) Time of day and/or time of year restrictions will be placed on construction activities associated with transmission and utility facilities, leasable and salable mineral exploration, and/or development that are in the immediate vicinity or would cross crucial sage grouse, deer and pronghorn antelope winter habitats, antelope kidding areas, or raptor nesting areas.

MONITORING AND EVALUATION OF THE RESOURCE MANAGEMENT PLAN

The resource management plan will be evaluated at five-year intervals to determine if there is sufficient cause to warrant revision or amendment. The evaluation will consist of a review of the issues, objectives, and management actions. The review will determine if these components are meeting the needs of management and define necessary changes as appropriate.

MANAGEMENT ACTIONS NOT EXPRESSLY ADDRESSED BY THE RESOURCE MANAGEMENT PLAN

The resource management plan is limited in scope to five significant issues. It is not intended to provide guidance for the management of all potential resource values and uses. Resource uses or management actions not mentioned in this plan shall be clearly consistent with the terms, conditions, and decisions of the approved plan.

Past management decisions unaltered by this plan remain in effect until expressly changed utilizing standard bureau decision procedures.

REVISIONS AND ERRATA

This section contains revisions, errata, and additions to those portions of the Draft RMP/EIS that are not reprinted in the Final.

Chapter 1

On page 1-5 under Issue 5 the second paragraph is changed to read: "As existing range survey information is either old or incomplete, future stocking rate adjustments, if any, would be based upon the range monitoring program. In cases where existing range monitoring data demonstrates the need for adjustments, stocking rates would be altered following the procedures contained in the grazing regulations (43 CFR, part 4100)."

Chapter 2

On page 2-2 under the Resource Conflict Areas section the second sentence is changed to read: "Each resource conflict area has a unique set of resource problems that warrant specific management prescriptions."

Table 2-1 is changed as follows:

Footnote 15 is added to the column title "Active livestock grazing preference (AUMs)." Footnote 15 is added to the bottom of the table and reads "15/ Active preference figures are the result of adjudication following the 1956-1965 Ocular Reconnaissance Range Survey." The 5 year averaged licensed livestock use (AUMs) is changed for Tierney Creek Allotment to 828. The total for the south Shoshone Resource Conflict Area is changed to 90,236 and the Grand Total for the resource area is changed to 239,717.

Table 2-3 is changed as follows: Licensed use as a result of short term livestock actions for the South Shoshone Resource Conflict Area is changed to 76,390 and for the Shoshone-Eureka Resource Area to 203,021. Initial adjustment is changed for the South Shoshone Resource Conflict Area to 74,045 and for the Shoshone-Eureka Resource Area to 197,813.

On page 2-18 and on page 2-25 paragraph B is changed to read: "L-K-J-northW-T-F or L-K-JsouthW-T-F, a corridor including the existing 230 KV powerline right-of-way. From W west to K, including lands administered by the Toiyabe National Forest, the southern limit of the corridor would be 3/4 mile south of the existing 230 kV line."

On page 2-19 under Short-Term Management Actions the first three sentences in the first paragraph are changed to read: "Authorize livestock use at 203,021 animal unit months. This level is 33 percent below active preference. The change would be a decrease of 36,696 animal unit months below the five-year average use level of 239,717."

In Table 2-4 licensed use as a result of short term livestock actions and actions of other resources is changed for the South Shoshone Resource Conflict Area to 113,762 and for the Shoshone-Eureka Resource Area to 279,499.

On page 2-27 under Management Actions, the first three sentences of the first paragraph are changed to read: "Authorize livestock use at 279,499 animal unit months. This level is 7 percent below active

Table A-1 Grazing Systems and Benefits for "Maintain" Category Allotments.

Allotment	Grazing System	Treatment*	Benefits	Comments
San Juan	Deferred rotation for 4 crested wheatgrass pastures	2 & 4	Uninhibitated growth of deferred pasture during period when plant is actively using stored reserves followed by livestock trampling/planting seed following seedripe.	AMP in operation since October 1969 operation also utilizes Forest Service permit 6-1 to 9-30. Purpose of AMP; Decrease surface erosion problems; increase percent composition of grasses; protect existing sage grouse habitat.
	Modified rest rotation for 2 native pastures	3	1 full year of uninhibited growth. Plants increase in production, seed production and storage.	
	1 pasture winter only	winter use only	Uninhibited growth for entire growing season	
	1 seeding after seedripe only	4	Uninhibited growth for entire growing season	
O'Toole	6 pastures: two 3 pasture systems; 1) deferred-rest rotation	2, 3	Improvement in native vegetation through rest and deferrment; increased production, seed production, and storage.	AMP in existence since 1969. Revised in 1980. Allotment contains 5 crested wheatgrass pastures used in conjunction with native.
	2) rest rotation	3	Maintenance of crested wheatgrass seedings and native pasture.	Allotment used in conjunction with Forest Service permit 6/1 to 9/30.

*See Appendix A-6 for treatments

Table A-1 Grazing Systems and Benefits for "Maintain" Category Allotments. (continued)

Allotment	Grazing System	Treatment*	Benefits	Comments
Ruby Hill	No AMP Primarily sheep use, sheep are herded, a few cows use the allotment also.		Herding of sheep keeps areas from being overgrazed.	
J.D.	No AMP Rest-rotation for 3 crested wheatgrass seedings and native.	3,6	Increased storage, production etc., of all pastures. Maintenance of crested wheatgrass. Native is rested during the critical spring growing season.	Permittee moves livestock, rotates areas of native pasture. Areas of native rested each year also. Native is deferred by using seedings. The allotment is very balanced. There is sufficient acreage for all grazing seasons. Allotment is very well watered.
Washington Creek	No AMP	Spring Rest	Spring use does not exceed available production for the period of use. Allotment is rested the remainder of the year.	
Willow Ranch	2 grazing systems involving 7 pastures; 1) Deferred rest rotation on native	1,3,4	Native plants increase in production, storage with deferment and rest. Seed trampled following deferment. Increase seedling establishment during rest year.	AMP in existence since 1965. Allotment used in conjunction with Forest Service Permit 6/15 to 9/30.

Table A-1 Grazing Systems and Benefits for "Maintain" Category Allotments. (continued)

Allotment	Grazing System	Treatment*	Benefits	Comments
Willow Ranch (cont.)	2) Delayed rest rotation on crested wheatgrass	3,6	Maintenance of crested wheatgrass pastures	
Willow Racetrack	No AMP			The entire allotment is a crested wheatgrass pasture.

Table A-2 Livestock Grazing Allotment Condition and Trend Data by Resource Conflict Area

South Shoshone Resource Conflict Area

Allotment Name	Selective Management Cagegory	Public Lands (acres)	Active Livestock Grazing Preference (AUMs)[1]	Ecological Condition[2] by Ecological Condition Class								Vegetation Trend[2]					
				Poor		Fair		Good		Excellent		Down		Static		Up	
				Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%
Austin	C	238,370	25,700	-	-	214,533	90	23,837	10	-	-	71,511	30	166,859	70	-	-
Buffalo Valley	I	120,604	6,588	-	-	96,483	80	24,121	20	-	-	18,091	15	102,513	85	-	-
Carico Lake	I	574,129	36,958	57,413	10	401,890	70	114,826	20	-	-	114,826	20	459,303	80	-	-
Clear Creek	I	24,700	1,075	-	-	22,230	90	2,470	10	-	-	-	-	24,700	100	-	-
Fish Creek	C	116,796	9,151	5,840	5	35,039	30	75,917	65	-	-	11,680	10	105,113	90	-	-
Gilbert Creek	I	248,724	16,964	12,436	5	124,362	50	111,926	45	-	-	136,798	55	111,926	45	-	-
Manhattan Mountain	C	60,980	3,437	-	-	51,833	85	9,147	15	-	-	24,392	40	36,588	60	-	-
Mount Airey	I	81,078	3,772	4,054	5	52,701	65	24,323	30	-	-	16,216	20	64,862	80	-	-
O'Toole Ranches	M	29,870	1,903	-	-	4,481	15	25,389	85	-	-	-	-	29,870	100	-	-
San Juan	M	60,900	3,386	-	-	3,045	5	57,855	95	-	-	-	-	60,900	100	-	-
Tierney Creek	I	6,260	478	-	-	3,756	60	2,504	40	-	-	626	10	5,634	90	-	-
Washington Creek	M	11,570	360	-	-	10,992	95	578	5	-	-	-	-	11,570	100	-	-
Total	3M, 6I, 3C	1,573,981	109,842	79,743	5	1,021,345	65	472,893	30	-	-	394,140	25	1,179,838	75	-	-

North Shoshone Resource Conflict Area

Allotment Name	Selective Management Cagegory	Public Lands (acres)	Active Livestock Grazing Preference (AUMs)[1]	Ecological Condition[2] by Ecological Condition Class								Vegetation Trend[2]					
				Poor		Fair		Good		Excellent		Down		Static		Up	
				Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%
Argenta	C	122,370	14,248	6,118	5	79,541	65	36,711	30	-	-	18,354	15	104,016	85	-	-
Copper Canyon	C	57,396	5,481	-	-	43,047	75	14,349	25	-	-	2,870	5	54,526	95	-	-
Total	2C	179,766	19,729	6,118	3	122,588	68	51,060	29	-	-	21,224	12	158,542	88	-	-

Table A-2 Livestock Grazing Allotment Condition and Trend Data by Resource Conflict Area

Eureka Resource Conflict Area

Allotment Name	Selective Management Category	Public Lands (acres)	Active Livestock Grazing Preference (AUMs)[1]	Ecological Condition[2] by Ecological Condition Class						Vegetation Trend[2]							
				Poor		Fair		Good		Excellent		Down		Static		Up	
				Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%
Arambel	C	45,526	2,554	-	-	22,763	50	18,210	40	4,553	10	4,553	10	40,973	90	-	-
Black Point	C	53,352	4,813	2,668	5	34,679	65	13,338	25	2,668	5	-	-	53,352	100	-	-
Corta	[3]	1,130	128	-	-	565	50	565	50	-	-	-	-	1,130	100	-	-
Diamond Springs	I	69,679	3,680	3,484	5	24,388	35	34,840	50	6,968	10	-	-	69,679	100	-	-
Dry Creek	C	149,225	5,701	-	-	89,535	60	59,690	40	-	-	-	-	149,225	100	-	-
Duckwater Indians	[3]	4,013	220	-	-	2,007	50	2,007	50	-	-	-	-	4,013	100	-	-
Fish Creek Ranch	I	287,984	18,914	28,798	10	201,589	70	57,597	20	-	-	-	-	86,395	30	201,589	70
Flynn and Parmann Individual	C	25,830	1,554	-	-	18,081	70	7,749	30	-	-	-	-	25,830	100	-	-
Grass Valley	C	282,854	24,199	-	-	183,855	65	84,856	30	14,143	5	-	-	212,140	75	70,714	25
Hicks Station	C	24,240	180	-	-	12,120	50	12,120	50	-	-	-	-	24,240	100	-	-
J.D.	M	97,740	13,197	-	-	48,870	50	39,096	40	9,774	10	-	-	97,740	100	-	-
Lucky C	C	108,666	5,080	5,433	5	81,500	75	21,734	20	-	-	-	-	97,799	90	10,867	10
North Diamond	C	81,952	4,370	-	-	73,757	90	8,195	10	-	-	-	-	81,952	100	-	-
Roberts Mountain	I	227,800	20,493	11,390	5	136,680	60	56,950	25	22,780	10	11,390	5	193,630	85	22,780	10
Romano	I	67,450	3,371	3,373	5	50,588	75	13,490	20	-	-	-	-	67,450	100	-	-
Ruby Hill	M	14,659	1,424	733	5	3,665	25	8,795	60	1,466	10	-	-	14,659	100	-	-
Santa Fe Ferguson	C	84,375	5,202	4,219	5	63,281	75	16,875	20	-	-	4,219	5	80,156	95	-	-
Seven Mile	C	88,428	8,852	4,421	5	48,636	55	26,528	30	8,843	10	4,421	5	84,007	95	-	-
Shannon Station/ Spanish Gulch	C	38,873	3,167	1,944	5	25,267	65	11,662	30	-	-	-	-	38,873	100	-	-
Simpson Park	C	97,945	6,042	4,897	5	68,562	70	24,486	25	-	-	4,897	5	93,048	95	-	-
Snowball	C	27,267	991	1,363	5	13,634	50	12,270	45	-	-	-	-	27,267	100	-	-
Sweeney Wash	C	7,220	478	-	-	4,332	60	2,888	40	-	-	722	10	6,498	90	-	-
Three Mile	C	26,635	1,301	1,332	5	22,640	85	2,664	10	-	-	1,333	5	25,303	95	-	-
Underwood	C	24,493	1,462	1,225	5	9,797	40	13,471	55	-	-	-	-	24,493	100	-	-
Willow Race Track	N	590	250	59	10	531	90	-	-	-	-	354	60	236	40	-	-
Totals	3M, 4I, 16C	1,937,926	137,623	75,339	4	1,241,327	64	550,076	28	71,195	4	31,889	2	1,600,088	82	305,950	16

Table A-2 Livestock Grazing Allotment Condition and Trend Data by Resource Conflict Area

Southern Valley Resource Conflict Area

Allotment Name	Selective Management Cagegory	Public Lands (acres)	Active Livestock Grazing Preference (AUMs)[1]	Ecological Condition[2] by Ecological Condition Class								Vegetation Trend[2]					
				Poor		Fair		Good		Excellent		Down		Static		Up	
				Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%	Acres	%
Kingston	C	77,530	2,728	-	-	69,777	90	7,753	10	-	-	3,876	5	73,6454	95	-	-
Millet Ranch Individual	C	1,100	72	-	-	330	30	770	70	-	-	-	-	990	90	110	10
Nielson Individual	C	540	116	27	5	162	30	351	65	-	-	-	-	540	100	-	-
Porter Canyon	C	125,150	7,241	-	-	93,862	75	31,288	25	-	-	12,515	10	81,348	65	31,287	25
Potts	C	167,600	9,262	8,380	5	142,460	85	16,760	10	-	-	-	-	167,600	100	-	-
South Smith Creek	C	151,000	5,331	-	-	128,350	85	22,650	15	-	-	-	-	120,800	80	30,200	20
Wildcat Canyon	C	63,150	2,677	6,315	10	50,520	80	6,315	10	-	-	-	-	63,150	100	-	-
Willow Ranch	M	63,510	5,370	-	-	19,053	30	31,755	50	12,702	20	-	-	63,510	100	-	-
Total	1M, 8C	674,143	33,378	15,950	2	525,392	78	120,098	18	12,702	20	17,619	3	594,926	88	61,597	9
Grand Total	7M,10I, 29C	4,365,816	300,572	177,150	4	2,910,647	67	1,194,127	27	83,897	2	464,873	11	3,533,393	81	367,547	8

1/ Active preference figures are the result of allotment adjudication following the 1956-1965 Ocular Reconnaissance Range Survey.
2/ Based upon the professional judgement of the Shoshone-Eureka Resource Area range staff.
3/ Categorized by Ely District

Table A-3 Final Allotment AUM Totals by Resource Conflict Area and Alternative

South Shoshone Resource Conflict Area

Allotment Name	5 year Average Licensed Livestock Use Use (AUMs)	Change in AUMs By Alternative: Preferred Short Term	Preferred Long Term	Protection Short Term	Protection Long Term	Economic Development Short Term	Economic Development Long Term	No Action Short Term	No Action Long Term
Austin	20,721	20,683	24,737	16,971	20,152	23,454	29,575	20,722	20,726
Buffalo Valley	6,454	9,049	9,049	8,449	8,449	10,166	10,166	6,454	6,454
Carico Lake	27,171	27,167	32,785	21,412	25,657	30,895	37,455	27,177	27,226
Clear Creek	715	787	787	787	787	787	787	715	715
Fish Creek	7,367	7,281	8,465	6,373	7,607	12,616	14,827	7,368	7,372
Gilbert Creek	13,656	13,691	15,302	9,659	11,098	18,858	20,549	13,663	13,721
Manhattan Mountain	2,579	2,581	3,356	1,526	2,039	5,246	6,027	2,580	2,584
Mount Airy	3,787	3,734	3,918	3,118	3,428	3,730	4,006	3,789	3,797
O'Toole Ranches	1,750	1,750	1,750	1,750	1,750	1,718	1,624	1,750	1,750
San Juan	4,920	4,861	4,629	4,886	4,818	4,842	4,647	4,920	4,920
Tierney Creek	828	1,171	1,171	1,171	1,171	1,164	1,145	828	828
Washington Creek	288	288	288	288	288	286	281	288	288
Total	90,236	93,043	106,237	76,390	87,244	113,762	131,089	90,254	90,381

Table A-3 Final Allotment AUM Totals by Resource Conflict Area and Alternative

Eureka Resource Conflict Area

Allotment Name	5 year Average Licensed Livestock Use (AUMs)[1]	Change in AUMs By Alternative							
		Preferred		Protection		Economic Development		No Action	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
Arambel	2,445	2,455	2,529	1,806	1,828	3,262	3,357	2,447	2,466
Black Point	4,633	4,585	4,583	3,329	3,324	4,611	4,571	4,633	4,633
Corta[1]	103	103	103	103	103	103	103	103	103
Diamond Springs	3,179	4,609	4,609	4,097	4,097	5,380	5,380	3,179	3,179
Dry Creek	4,220	4,200	4,161	3,255	3,216	4,200	4,161	4,220	4,220
Duckwater Indians	177	177	177	177	177	177	177	177	177
Fish Creek Ranch	9,320	9,288	10,552	7,676	8,643	10,261	13,959	9,324	9,346
Flynn and Parmann Individual	1,226	1,241	1,343	799	830	1,245	1,376	1,228	1,252
Grass Valley	21,464	21,431	21,380	13,566	13,499	24,492	24,447	21,465	21,469
Hicks Station	179	179	179	179	179	179	179	179	179
J.D.	13,193	13,201	13,261	13,195	13,212	13,960	14,039	13,195	13,209
Lucky C	1,464	1,467	1,489	1,099	1,105	2,284	2,312	1,465	1,469
North Diamond	4,151	4,151	4,151	2,730	2,730	4,151	4,151	4,151	4,151
Roberts Mountain	17,290	21,147	21,324	19,523	19,604	22,936	23,067	17,293	17,316
Romano	2,714	2,435	4,718	2,560	3,838	2,434	4,505	2,715	2,724
Ruby Hill	1,426	1,320	1,313	1,418	1,402	1,481	1,389	1,426	1,426
Santa Fe Ferguson	4,188	4,168	4,129	3,558	3,519	4,168	4,129	4,188	4,188
Seven Mile	5,043	5,043	6,147	4,018	4,822	5,799	6,903	5,043	5,043
Shannon Station/ Spanish Gulch	2,848	2,619	2,599	2,097	2,069	2,598	2,371	2,848	2,848
Simpson Park	4,783	4,786	5,478	3,445	3,786	4,775	5,473	4,784	4,789
Snowball	991	991	991	759	759	991	991	991	991
Sweeny Wash	447	477	477	323	323	561	561	477	477
Three Mile	1,001	959	1,456	422	717	973	1,436	1,001	1,001
Underwood	1,177	1,177	1,427	821	946	1,177	1,427	1,177	1,177
Willow Race Track	250	250	250	250	250	250	250	250	250
Totals	107,942	112,459	118,826	91,205	94,978	122,448	130,714	107,959	108,083

Table A-3 Final Allotment AUM Totals by Resource Conflict Area and Alternative

North Shoshone Resource Conflict Area

Allotment Name	5 year Average Licensed Livestock Use (AUMs)[1]	Change in AUMs By Alternative: Preferred Short Term	Preferred Long Term	Protection Short Term	Protection Long Term	Economic Development Short Term	Economic Development Long Term	No Action Short Term	No Action Long Term
Argenta	12,107	12,063	11,778	8,366	8,324	11,787	10,884	12,108	12,114
Copper Canyon	4,248	4,213	3,981	2,862	2,801	3,961	3,134	4,248	4,248
Total	16,355	16,276	15,759	11,228	11,125	15,748	14,018	16,356	16,362

Southern Valley Resource Conflict Area

Allotment Name	5 year Average Licensed Livestock Use Use (AUMs)	Change in AUMs By Alternative: Preferred Short Term	Preferred Long Term	Protection Short Term	Protection Long Term	Economic Development Short Term	Economic Development Long Term	No Action Short Term	No Action Long Term
Kingston	2,361	2,342	2,287	2,175	2,139	2,342	2,301	2,361	2,361
Millet Ranch Individual	72	72	72	67	67	72	72	72	72
Nielson Individual	93	93	93	93	93	93	93	93	93
Porter Canyon	5,333	5,323	5,415	5,307	5,291	6,960	7,098	5,339	5,376
Potts	7,487	7,476	7,452	6,958	6,934	7,476	7,452	7,487	7,487
South Smith Creek	4,291	4,299	4,531	4,200	4,226	4,900	5,211	4,300	4,371
Trail Canyon	468	468	468	410	410	463	451	468	468
Wildcat Canyon	2,155	2,155	2,155	2,063	2,063	2,127	2,045	2,155	2,155
Willow Ranch	2,924	2,927	2,949	2,925	2,931	3,108	3,136	2,925	2,929
Total	25,184	25,155	25,422	24,198	24,154	27,541	27,859	25,200	25,312

CONSULTATION AND COORDINATION

PUBLIC INVOLVEMENT

A notice of intent to commence land use planning for the Shoshone-Eureka Resource Area was published in the Federal Register in March of 1981. During April of 1981 a news release announced the beginning of the issue identification phase of the resource management plan. It explained the purpose of the plan and the manner in which the public could participate in the planning process. Four open houses provided the public with an opportunity to discuss the planning process and identify issues and were held May 4 in Battle Mountain, May 5 in Austin, May 6 in Eureka, and May 7 in Reno.

The Battle Mountain District Advisory Council (a 10-member group of citizens representing such interests as ranching, wildlife, mining, elected government, environmental preservation, and the public at large) was briefed about the process at its October 1980 meeting.

In April 1981, Bureau personnel met with local Indian tribes and with the commissioners of Eureka, Lander, and Nye counties. These individuals were informed about the planning process and asked to identify their concerns.

SCOPING PROCESS

A newsletter explaining the scope and purpose of the Shoshone-Eureka Resource Management Plan was issued during the first half of 1981 and mailed to approximately 200 individuals, organizations and agencies. A 45-day formal comment period regarding the potential issues began April 20, 1981 and ended June 5, 1981.

A letter explaining the results of issue identification was sent to individuals and organizations on the mailing list in December of 1981. It included a discussion of planning criteria and invited the public to review the draft criteria.

A notice of intent to develop alternatives for the resource management plan was published in the Federal Register in November, 1982. An informational letter describing the draft alternatives was mailed to over 250 individuals, organizations, and agencies. A public comment period was held from December 1, 1982 to January 10, 1983. Open houses were held in Battle Mountain, Eureka, and Reno in December. Twenty-five comment letters were received during the comment period resulting in several changes to the proposed alternatives.

PUBLIC REVIEW AND HEARINGS

A notice announcing the filing of the draft resource management plan/ environmental impact statement with the Environmental Protection Agency and its availability to the public was published in the June 24, 1983 issue of the Federal Register.

This notice announced that the review period was to end on September 21, 1983, and included notification of public hearings to be held in Battle Mountain, Eureka, and Reno, Nevada. News releases were issued from the Nevada State Office to local and regional news media. Some 350 copies of the draft document as well as 150 copies of the document summary were distributed to the following reviewing agencies, elected officials, and interested publics. An asterisk indicates those who commented on the document.

CONGRESSIONAL

Senator Chic Hecht
Senator Paul Laxalt
Congressman Harry Reid
Congresswoman Barbara Vucanovich

FEDERAL AGENCIES

Advisory Council on Historic Preservation
Department of Agriculture
 Forest Service
 Soil Conservation Service
Department of Defense
 Department of the Air Force
Department of Energy
Department of the Interior
 Bureau of Indian Affairs*
 Bureau of Mines
 Bureau of Reclamation*
 Fish and Wildlife Service
 Geological Survey*
 National Park Service
Environmental Protection Agency*

STATE AGENCIES

Office of the Governor, Nevada
Nevada State Clearinghouse--25 copies for distribution to State Agencies*
Legislative Counsel Bureau

LOCAL AGENCIES

Eureka County Commissioners
Lander County Commissioners*
Nye County Planner

UNIVERSITY OF NEVADA

Max C. Fleischmann College of Agriculture Cooperative Extension Service
Division of Agricultural and Resource Economics
Division of Animal Science
Division of Renewable Natural Resources
Desert Research Institute, Las Vegas and Reno
Mackay School of Mines
Nevada Bureau of Mines and Geology

NEVADA STATE LEGISLATORS

Richard E. Blakemore
Norman Glasser
John Marvel
Kenneth K. Redelsperger

OTHERS

American Horse Protection Association, Inc.
Audubon Society, Lahontan Chapter
Camp Fire Club of America
Center for Action on Endangered Species, Inc.
Desert Fishes Council
Desert Protective Council, Inc.
Environmental Action, Inc.
Foresta Institute
Grazing permit holders within the Shoshone-Eureka Resource Area*
International Society for the Protection of Mustangs and Burros
Mining Companies and Organizations*
National Council of Public Land Users, Colorado
National Rifle Association of America

National Trappers Association, Inc.
National Wildlife Federation
Nationwide Forest Planning Clearinghouse
Natural Resources Defense Council
Nature Conservancy
Nevada Cattlemen's Association
Nevada Mining Association*
Nevada Outdoor Recreation Association/National Public Lands Task Force
Nevada Wildlife Federation
North American Falconers Association
Northern Nevada Native Plant Society
Pacific Legal Foundation
Private citizens who have participated in the planning process*
Private citizens who have requested a copy of the plan
Public Lands Council
Sierra Club*
Sierra Pacific Power Company*
Society of American Foresters
Society for Range Management
Wilderness Society
Wild Horse Organized Assistance
Wildlife Management Institute
Wildlife Society, Nevada Chapter

A public hearing was held in Battle Mountain on July 26 attended by five members of the public, one of whom made an oral statement. A second hearing was held in Eureka on July 27. It was attended by 17 members of the public, 4 of whom made oral statements. A third hearing was held in Reno on July 28 and was attended by 16 members of the public, 10 of whom made oral statements. The transcripts of these public meetings are available for inspection at the Bureau of Land Management Battle Mountain District Office, North 2nd and Scott Streets, Battle Mountain; at the Nevada State Office, 300 Booth Street, Reno; and at the Bureau of Land Managment Office of Public Affairs, 18th and C Streets, Washinton D.C.

In addition to the testimony received at the public hearings, 24 comment letters were received during the 90 day comment period.

AVAILABILITY OF FINAL PLAN AND ENVIRONMENTAL IMPACT STATEMENT

The final resource management plan and environmental impact statement was sent to those who received copies of the draft document and all who commented on the draft. A Federal Register notice and an area-wide news release were also used to inform the public of the availability of the final RMP/EIS. Copies of the final document are also available for review at the following Bureau of Land Management offices and public libraries:

BUREAU OF LAND MANAGEMENT OFFICES

Office of Public Affairs
Bureau of Land Management
18th and C Streets
Washington, D.C. 20240

Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Battle Mountain District Office
North 2nd and Scott Streets
P.O. Box 1420
Battle Mountain, Nevada 89820

Carson City District Office
1050 East Williams Street
Carson City, Nevada 89701

Elko District Office
2002 Idaho Street
Elko, Nevada 89801

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

Las Vegas District Office
4765 West Vegas Drive
Las Vegas, Nevada 89102

Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

PUBLIC LIBRARIES

Churchill Public Library
553 South Main Street
Fallon, Nevada 89406

Clark County Library
1401 East Flamingo Road
Las Vegas, Nevada 89121

Elko County Library
720 Court
Elko, Nevada 89801

Esmeralda County Library
Goldfield, Nevada 89013

Eureka County Library
Eureka, Nevada 89316

Lander County Library
Battle Mountain, Nevada 89820

Mineral County Library
1st and D Streets
Hawthorne, Nevada 89415

Nevada State Library
Library Building
Carson City, Nevada 89710

Nye County Library
Tonopah, Nevada 89049

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

University of Nevada, Reno
Getchall Library
Reno, Nevada 89507

Washoe County Library
1301 South Center Street
Reno, Nevada 89505

White Pine County Library
City Hall
Ely, Nevada 89301

INTRODUCTION TO PUBLIC COMMENTS AND RESPONSES

All written and oral comments on the Draft RMP/EIS were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the Draft document. Substantive comments which presented new data, questioned facts or analyses, or commented on issues bearing directly on the Draft were fully evaluated and were responded to in this final document. Changes or additions to the Draft RMP/EIS have been incorporated into the Revision and Errata Section of this document.

All letters received have been reprinted, with the comments responded to indicated. Specific comments from the oral testimony which met the criteria for response have also been reprinted and responded to. Table 6-1 shows a list of respondents to the Draft EIS and the subject of comments given responses. Comment letter 19 included responses from the following state agencies:

Department of Environmental Protection
Department of Minerals
Department of Conservation and Natural Resources
Division of State Lands
Department of State Parks
Division of Water Planning
Department of Agriculture
UNR - Bureau of Mines
Department of Wildlife

Table 6-1 Respondents to Shoshone-Eureka Draft RMP/EIS and Areas of Concern

	Text Changes and Clarifications	Alternatives	Issues or Resources Not Analyzed	Standard Operating Procedures	Wilderness Recommendations	Land Tenure Adjustments	Utility Corridors	Woodland Management	Grazing Management and AMPs	Forage use and Livestock Numbers	Vegetation Condition, Trend and Inventory Data	HMC Classification and Monitoring	Aquatic and Riparian Habitat	Wildlife Numbers and Distribution	Wild Horse Numbers and Distribution	Economic Analysis	Recreation, Visual & Cultural Resources	ACECs	Pesticide Use
1. Lander County Board of Commissioners	1																		
2. Charles H. Bagley																			
3. USDI, Bureau of Indian Affairs																			
4. Reed Seaver																			
5. Nevada Outdoor Recreation Assn.					1	2													
6. USDI, Bureau of Reclamation	2,3		1,4																
7. Harry Waits					1,2,3												4,5		
8. Resources Concepts, Inc.		9,12 13,14,15								20,26 27	1,2,3 4,8	15,16	5,6,7 17,18 19	11,24	10,21 22,23	28,29 30			
9. Homestake Mining Company																			
10. Sierra Club, Toiyabe Chapter					1	3		2											
11. Wildlife Management Institute	4			5						1,3	6			2			7		
12. USDI, U.S. Geological Survey			1																
13. USDI, National Park Service																			
14. The Wildlife Society Nevada Chapter			9	6,8						2	7	5	3,4						
15. Natural Resources Defence Council	9	4,6	3,7							5	1,2	10							
16. Sierra Pacific Power Company	1,4,5 6,7						2,3												
17. Goldfields Mining Corporation			1																
18. Sierra Club, Toiyabe Chapter		5							1			2,4							
19. State of Nevada Office of Community Services	10,11 21			21,22 24		2,6 13,18	5,14	15	16	3,26		12,17 19	25	4,7				8,20	1,9
20. Richard McKay																			
21. Minerals Exploration Coalition																			
22. Atlantic Richfield Company			1																
23. U.S. Environmental Protection Agency			1																
24. Hull & McCarthy				2		1													
1-1 Bill Card					1,2,3														
1-2 Bob Millard						1				–									
1-3 J. Laver Young						4				–				2	1,3				
1-4 Bob Barren			2,3		1,4												4,5		
1-5 Barbara Kelly					1														
1-6 Dave Hornbeck					1														
1-7 Amy Nazzo					1														
1-8 Roger Scholl					1														
1-9 Claude Hunter																		1	
1-10 Marjorie Sill						1													

Comment Letter 1

Lander County

BOARD OF COMMISSIONERS
P.O. Box 940
Battle Mountain, Nevada 89820

Chairman Warren Storie
Commissioner John Kincheloe
Commissioner Ed Ruth

June 20, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

The following are Lander County's comments on the draft Shoshone - Eureka Resource Management Plan and Environmental Impact Statement. The Board strongly favors the Economic Development Alternative, as it offers sufficient incentive and flexibility for renewed and sustained industrial and commercial economic growth in Lander County, yet will realistically approach agency and local concerns pertaining to livestock use, wildhorse levels, and wildlife habitat management in general. This option will potentially allow full mineral development of the Simpson Park area. Inasmuch as mining provided 43% of the employment and 59% of the income in Lander County in 1980, we would strongly encourage prudent yet largely unhindered use of public land for mineral exploration. We note with interest that public demand for wood products would be best met under this alternative. Although in the long run preference for development of geothermal and solar energy as a cleam alternative to wood as a fuel is indicated, fuller public access to wood fuel in the short term in countering expensive electrical and natural gas rates is a worthy goal.

We note with interest that under the economic development alternative, that wild horse numbers would be reduced in all resource conflict areas, yet the condition of remaining wild horses would improve through better provision of water supplies. We find this to be a more humane and responsive answer to the wild horse problem in the long run.

1-1 We note with interest that under this alternative as well a 17% increase in livestock grazing use would be realized or 39,782 AUM's. It is not clear from the DEIS (p. 4 - 44, 4 - 45) the long - term beneficial effect to the livestock industry in general here because of enumerated tradeoffs in the DEIS. In terms of cultural and visual resources, it is not felt that the economic development alternative would have a long-term adverse effect.

Wilderness values that may accrue by inclusion designation of Simpson Peak and Roberts wilderness study area would be it is felt more than offset by adverse economic effects by limiting these areas to mineral development. It is felt that this is also true in terms of primitive recreation use tradeoffs.

The three most significant areas of benefit to Lander County under this option are mineral exploration and development, energy and utilities, and economic impacts. It may be stated with summary that Lander County would favor any option that:

1. Increase livestock industry employment.
2. Encourage development and exploration of mineral resources, and increase local employment in this sector;
3. Encourage long - term planning and needs [illegible] by utility companies;
4. Increase the percentage of private ownership of public lands;
5. Encourage local fuel energy independence;
6. Work toward a long - term solution to control of wild horse herds;
7. Provide enhanced opportunities for primitive recreation.

Sincerely,

Warren M. Storie

Warren M. Storie, Chairman
Lander County Commission

Comment Letter 2

CHARLES M BAGLEY JR M.D.
ROBERT F LANE, M.D.
INTERNAL MEDICINE, HEMATOLOGY & ONCOLOGY

801 Broadway Suite 775
Seattle Washington 98122
(206) 682-5040

1530 North 115th, Suite 301
Seattle, Washington 98133
(206) 365-8252

June 22, 1983

H. James Fox, District Manager
Bureau of Land Management
P. O. Box 194
Battle Mountain, Nevada 89820

Re: Summary draft, E.I.S. for Shoshone-Eureka Resource Management Plan

Dear Mr. Fox:

Thank you for the opportunity to comment on this plan. While I have not specifically visited the Antelope range area of Nevada, I have recently driven through other parts of Central Nevada, and saw multiple mountain ranges that would obviously seem to qualify for wilderness protection. In particular, the Diamond Mountain area is quite attractive, and I would think is excellent for wilderness protection, but seems to have conflicting private land claims.

Therefore, I am sure the proposal of the Antelope area and the Roberts area for wilderness protection is very appropriate, and I would support these designations, as I am sure they are just as attractive as the areas I myself have seen recently. I endorse your preferred alternative.

Best wishes,

Charles M. Bagley, Jr., M.D.

210/14

Comment Letter 3

UNITED STATES GOVERNMENT

memorandum

Real Estate Services 602-241-2275
FTS-261-2275

DATE: JUL 13 1983

REPLY TO ATTN OF: ASSISTANT Phoenix Area Director

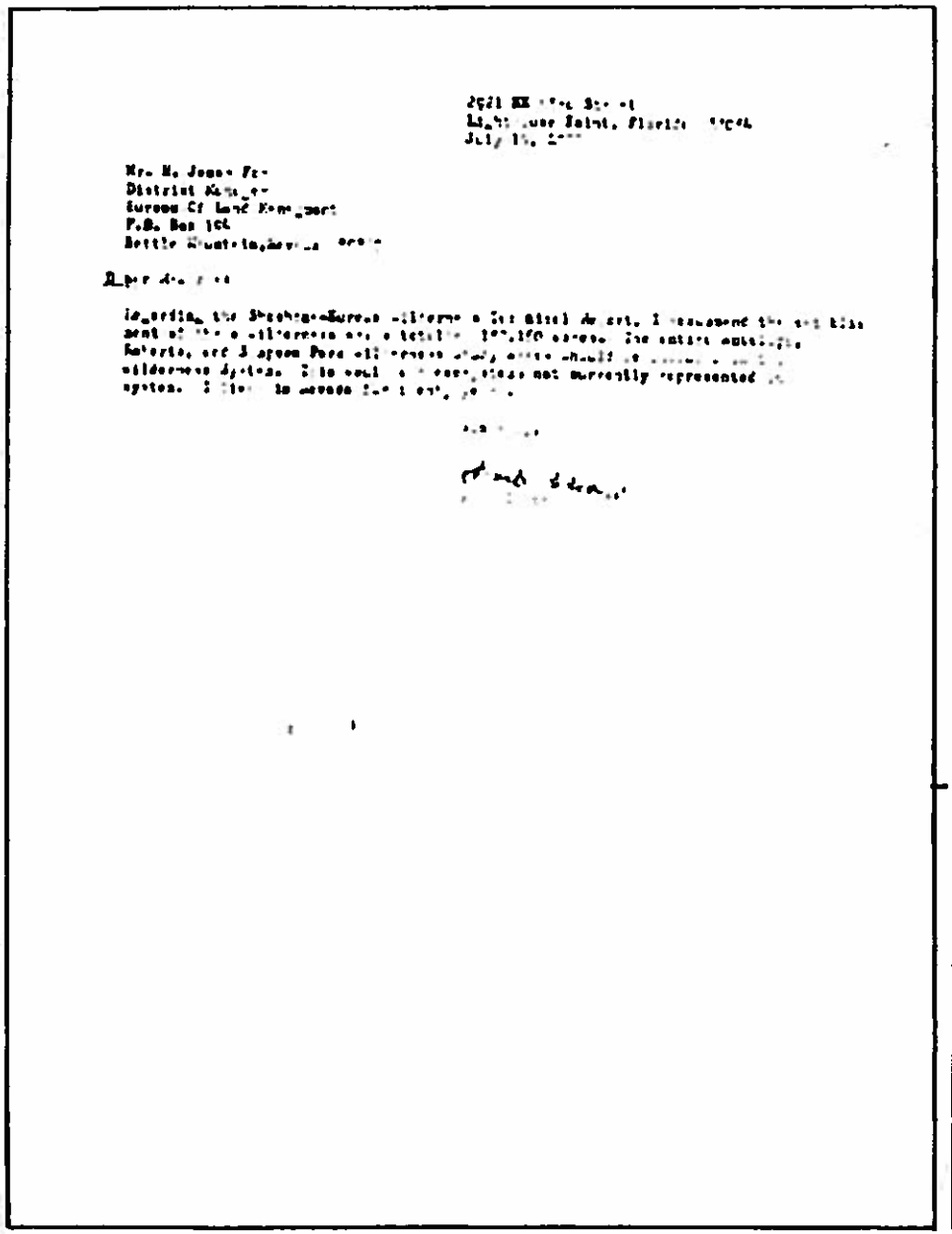
SUBJECT: Draft (Summary) Shoshone-Eureka Resource Management Plan and Environmental Impact Statement, Nevada

TO: District Manager, Bureau of Land Management
Battle Mountain, NV 89820

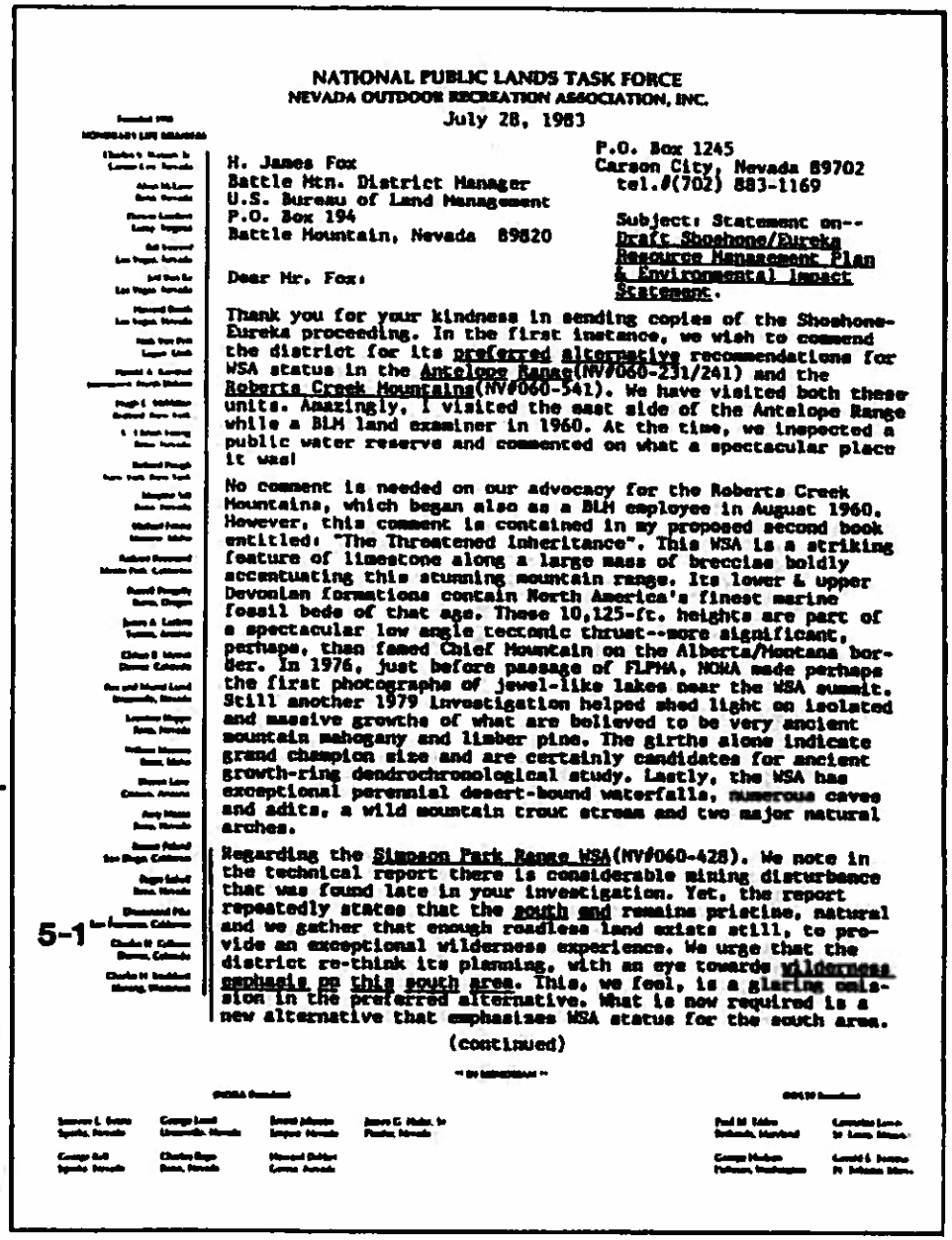
A review of the above subject has been completed by our Environmental Staff.

There will be no impact to reservations under the Phoenix Area Office's jurisdiction. We, therefore, have no comments.

Comment Letter 4



Comment Letter 5



NATIONAL PUBLIC LANDS TASK FORCE
NEVADA OUTDOOR RECREATION ASSOCIATION, INC.

July 28, 1983

P.O. Box 1245
Carson City, Nevada 89702
tel.#(702) 883-1169

H. James Fox
Battle Mtn. District Manager
U.S. Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Subject: Statement on--
Draft Shoshone/Eureka
Resource Management Plan
& Environmental Impact
Statement.

Dear Mr. Fox:

Thank you for your kindness in sending copies of the Shoshone-Eureka proceeding. In the first instance, we wish to commend the district for its preferred alternative recommendations for WSA status in the Antelope Range(NV#060-231/241) and the Roberts Creek Mountains(NV#060-541). We have visited both these units. Amazingly, I visited the east side of the Antelope Range while a BLM land examiner in 1960. At the time, we inspected a public water reserve and commented on what a spectacular place it was!

No comment is needed on our advocacy for the Roberts Creek Mountains, which began also as a BLM employee in August 1960. However, this comment is contained in my proposed second book entitled: "The Threatened Inheritance". This WSA is a striking feature of limestone along a large mass of breccias boldly accentuating this stunning mountain range. Its lower & upper Devonian formations contain North America's finest marine fossil beds of that age. These 10,125-ft. heights are part of a spectacular low angle tectonic thrust--more significant, perhaps, than famed Chief Mountain on the Alberta/Montana border. In 1976, just before passage of FLPMA, NOHA made perhaps the first photographs of jewel-like lakes near the WSA summit. Still another 1979 investigation helped shed light on isolated and massive growths of what are believed to be very ancient mountain mahogany and limber pine. The girths alone indicate grand champion size and are certainly candidates for ancient growth-ring dendrochronological study. Lastly, the WSA has exceptional perennial desert-bound waterfalls, numerous caves and adits, a wild mountain trout stream and two major natural arches.

5-1 Regarding the Simpson Park Range WSA(NV#060-428). We note in the technical report there is considerable mining disturbance that was found late in your investigation. Yet, the report repeatedly states that the south end remains priceless, natural and we gather that enough roadless land exists still, to provide an exceptional wilderness experience. We urge that the district re-think its planning, with an eye towards wilderness emphasis on this south area. This, we feel, is a glaring omission in the preferred alternative. What is now required is a new alternative that emphasizes WSA status for the south area.

(continued)

Comment Letter 5

5-2 On the afternoon of July 28, 1983, we were stunned to see very large areas of BLM Public Lands earmarked for sale on maps in the statement. Are you aware of two statements, one by the Property Review Board and the other by Interior Secretary James Watt, which "reaffirms that 'Asset Management' land disposals will be only(devoted to) small isolated tracts, not large amounts of acreage"? Yet, I see in some of the maps whole townships earmarked for possible sale and/or disposal. We find this markedly inconsistent with both Secretary Watt's and Edwin L. Harper's words and emphasis. We trust you will read these two statements(dated July 18 and July 7 respectively). Under the circumstances this organization officially protests and appeals all the large-scale sales and/or disposals in the plan.

My 1960 visit to the Antelope Range was the only time I had apparently actually entered part of the present-designated WSA. Would there be an opportunity for a show me trip to see it soon. We would very much like to have new photographs for our coming Desert Wilderness Conference on September 16-18. We would also like to visit the district again to possibly see the south end of the Simpson Park Range--and see for ourselves the character of this WSA. Could it be arranged soon?

Yours very sincerely,

Charles S. Watson, Jr.
Director

Comment Letter 6

United States Department of the Interior
~~WATER AND POWER RESOURCES SERVICE~~
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY REFER TO: MP-150

AUG 5 1983

To: N. James Fox, District Manager,
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

From: ~~Acting Assistant~~ Regional Director, Sacramento, CA

Subject: Review of Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement (DES 83/40)

We have reviewed the draft statement and our comments are as follows:

General

6-1 Chapter 1, Planning Issues and Planning Criteria - Surface and ground water availability and management should be discussed. To assure current users that the quality and quantity of their water will be protected, mitigation measures should be developed for identified impacts.

Specific

6-2 1. Preferred Alternative, Wilderness Management Action #2, page 2-8, Col. 2, paragraph 4 - The term "human imprints", first used in this section, should be included in the glossary.

6-3 2. Implementation of the Resource Management Plan, Item #14, page 2-36 - Regarding the endangered species discussion, it would be more accurate to state that Section 7 consultation would be required for any Federal action which may affect listed species.

6-4 3. Environmental Consequences, Land Ownership, page 4-2 - It is stated that disposal of some Federal lands would allow additional community expansion and commercial and industrial development. Such expansion and development will increase the demand for water. The potential effects of this increased demand on current water users and ecosystems must be addressed as an indirect impact.

Thank you for the opportunity to comment.

Copy to: Commissioner, Washington, D.C.
Attention: Code 150

Comment Letter 7

Mr. H. James Fox
District Manager, BLM
Battle Mtn. NV 89820

13.08.83.

Dear Mr. Fox:

Enclosed are my comments for your consideration on the Draft Shoshone-Eureka RMP and DEIS.

My comments are based on some first hand experience as a recreationist, both as a hiker in wilderness setting and also as an explorer of back-country roads and ways with my ORV, in Shoshone-Eureka RA. My interest and enjoyment of recreational activities, belonging to both ends of the spectrum, has estranged me from the polarized pro or con [illegible] wilderness organizatio n and therefore the comments following are those of my own.

The RMP and DEIS were well organized for reference use. The wilderness Technical Report made interesting reading and also will be very useful in planning my future recreational activities in this RA.

ANTELOPE WSA Support the Preferred Resource Management Plan. Strongly support the exclusion of the 4800 acres due to human impacts and manageability problems if included in WA. Exclusion will improve the quality level of the unit.

7-1 Recommend the shifting of the southernmost [illegible] boundary to follow the jeep trail which is only a short distance from the proposed boundary. This jeep trail could provide access to camping and staging spots for the WSA user

This unit has all the attributes for high quality wilderness experience especially its remoteness and adequate size are appealing and should be definitely classified as a wilderness area. Only a WA designation will save the untrampled meadows from demise.

ROBERTS WSA Support the Preferred RMP.

7-2 The Technical Report on page 15 rightfully expresses the concern as to the manageability problem of a southern way. If the way in the SE corner is meant then thought should be given to exclude it from the WA proposal and make it the boundary line and this boundary line to connect up with the end of the close by fence line. In my opinion it is far better to exclude it and not invite violations of the wilderness. Such violations occuring in one WSA can then be used as moral excuse to extend this type of violation to other wilderness units also. Such is human nature. Moreover the acreage lost is small.

....2

Comment Letter 7

7-3 Mention is made on p.17 that primitive ways inside the wilderness areas will be left open for vehicular use , related to a valid existing right. What that is going to mean in real life is all the friends of that right holder and all his acquaintances who prefer vehicular access for hunting and/or shorten their horse or foot trips into wilderness area will have keys to the locked gate. A road/way which is used on a non/emergency basis could not be classified as wilderness. Most tasks can be done using horses. As an example in Arizona a powerline built long ago and is now in a WSA has been maintained by horse transport. Either close a road/way to all or exclude it from wilderness designation and leave it open to all.

This WSA is very scenic and has outstanding supplemental geologic values of high interest which attracts visitors from far afield already and once established as WA many more will come. It contains many types of features of interest for such a small area. All this makes it a natural for a protected wilderness status.

Its size is fairly small making day use the common type of use. Number of visitors to an area is a function of information available; once established as a wilderness area (WA) and printed information will be distributed (it is only a matter of short time until someone is going to publish a detailed guidebook to all BLM wilderness areas) therefore a substantial increase to this area is going to occur. The visitors will be camping at their vehicular transport at or near the perimeter of the WSA. Has this taken in account in drawing the present boundaries? I saw no evidence of this in the RMP or WIR! Perhaps some of the ways or part of these could be excluded from wilderness designation for such use or in some locations withdrawal of surrounding lands must be made. In any case this type of use must be given consideration before the wilderness boundaries are finalized.

Simpson Park WSA Support non-wilderness status (Preferred RMP) I was not impressed with this area as wilderness, specially not with the northern half and Shaghasty basin. Too many human imprints the many disturbances of the past have been allowed to happen with no restrictive controls from the BLM. To declare these parts as wilderness is lowering the standards. Compared to Roberts WSA the unit is not very scenic. No outstanding special scenic or geologic features were evident.

The southern half is in a more natural state but constricted by the two private holdings. If a WA should be established for the southern part a right-a-way through these preivate lands need to be obtained.

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Another reason for non-wilderness recommendation is that the area is not manageable to strictly enforce protective regulations. To add wilderness areas which can not effectively protected will be setting a damaging example affecting adversely other WA units. The RMP on p.3-20 concedes to the difficulty to the closure of ways and controlling of motorized entry.

OTHER RESOURCE ISSUES.

GRAZING Support the Resource Protective Alternative.

The short term downward adjustments and providing rest periods from grazing during critical growth periods will bring about the needed improvement of the soil, vegetation and watershed resources. Eventually the livestock owner too is to reap the benefits. That short term reduction in grazing bringing long term benefits is resisted by ranchers and not more vigorously pursued by BLM in their action decisions is a definite weakness and deficiency in reasoning in all parties concerned. A destruction of a resource in name of tradition?

ACCESS

7-4 No mention is made in Shoshone-Eureka RMP/EIS as to the status of legal access for routes and roads which would enhance the management and visitor access to wilderness and recreation areas. This subject is discussed and evaluated in other BLM districts RMP/EIS (Wells RA for an example). In your report the whole issue is ignored. Hopefully an evaluation and action plan for legal access where such would be beneficial to the management and to the public will be made in your Final Environmental Impact Statement draft. Where lack of right-of-way hinders the ready access by the public to areas with recreational resources, proceedings should be started to obtain the needed access easements. Lack of easement through private land can eliminate a recreational resource.

Geothermal RESOURCE AS A RECREATIONAL RESOURCE

7-5 This resource was evaluated only in terms of industrial-commercial utilization. No mention in your RMP/EIS was made of the many hot springs in your RA under discussion. Other BLM districts have evaluated this valuable recreational resource in their RMP-s. The Draft Final EIS should remedy this omission.

Sincerely,

Harry Melts
Box 668
Creston, B.C. V0B 1G0
Canada

Comment Letter 8

RESOURCE CONCEPTS INC
FORESTRY · ECONOMICS
RESOURCE PLANNING

August 11, 1983

TO: Mr. Jim Fox, District Manager
Bureau of Land Management
Battle Mountain District
Post Office Box 194
Battle Mountain, Nevada 89820

FROM: John L. McLain
Certified Range Management Consultant
Resource Concepts, Inc. (RCI)
Carson City, Nevada 89701

SUBJECT: N-6 State Grazing Board Comments to the Draft Shoshone-Eureka RMP

The following comments to the subject document are provided on behalf of the N-6 State Grazing Board and formulated by RCI, consultant to the Board. The Board would very much appreciate a response to each question posed by the following comments.

Professional Judgement

The N-6 State Grazing Board is concerned that while the Bureau's "professional judgement" may be the "best available data", it may not necessarily be accurate. The Board realizes that this data is used for planning purposes and not directly for basing initial livestock adjustments. However, this data does serve as the supportive basis for the alternatives and projected environmental consequences. Since the need for major actions affecting livestock operations are justified by the professional judgements of the Shoshone-Eureka area range staff, it is essential that this information is reasonably reliable.

NPA regulations encourage the consultation and coordination with other professionals from outside the Bureau. It would behoove the

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Bureau to have requested the assistance of other range professionals (i.e., University of Nevada, SCS, etc.) in the determinations of ecological condition and trend. Due to the controversial nature and inherent difficulties of determining the direction in trend and status of range condition, quite possibly other range professionals would have reached different conclusions concerning the amount of acreage in downward trend and poor condition.

8-1 Question 1: Have other professionals, who possibly have more experience and are better qualified for determining ecological condition and direction in trend, been consulted during the Bureau's preparation of the EIS?

If they have not or have differing opinions, a qualifying statement should be included in the final document indicating that "the determination of range condition and trend, based solely on professional judgement without supportive data, is highly speculative. The judgments expressed by the Shoshone-Eureka range staff are not necessarily the same opinions shared by other range professionals." The Nevada State Grazing Board contends that the Bureau has in addition to the public, to accurately portray existing conditions within the Resource Area. If the "best available data" is subject to considerable question, it should be clearly stated as such. NEPA regulation 1502.22 states:

> "When an agency is evaluating significant adverse effects on the human environment in an Environmental Impact Statement and there are gaps in relevant information or scientific uncertainty, the agency shall always make clear that such information is lacking or that uncertainty exists."

CFR 1601.5-8 (outlining specific BLM approach to preparation of RMPs) states:

> "The documentation shall include an indication of the reliability of the data and estimates involved."

8-2 Question 2: What specific parameters were observed to serve as guidelines in formulating a professional opinion on range trend? The Board assumes that more than one person was responsible for determining trend on the 4.5 million acres. It would seem necessary to develop trend evaluation criteria in order to avoid personal bias and differences in professional opinion between range conservationists.

> NEPA 1502.24 states:
>
> "Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in EIS's. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement."

BLM Memorandum 4412, M-931.5 states: "This subject should be omitted from the manual. By definition, trend is measured over time. Attempts at collecting trend data with one time recordings are often misleading and the data is of questionable value from a management and decision perspective." Therefore, the Board assumes that the acreages pertaining to trend portrayed in Table 3-3 are based on long term observations and not on apparent trend. According to the EIS, it takes 3-5 years to determine direction of trend in range condition.

8-3 Question 3: Have the members of the Shoshone-Eureka Resource Area range staff, whose professional judgements were used in determining range condition and trend for the 4.5 million acres, been actively working within the range program of the Resource Area for 3-5 years?

Ecological Range Condition, Big Game Habitat Condition, and Riparian Condition

The Board is familiar with the approach of evaluating rangelands based on ecological range condition. This method rates range condition in relation to the site's potential plant community based on relic areas, specific soils data, precipitation, etc. However, the Board is not familiar with the approach taken in evaluating Big Game Habitat condition.

8-4 Question 4: What parameters were measured to determine Big Game Habitat Condition? Is the evaluation of Big Game Habitat Condition based on site potential? Theoretically, can an area be rated in excellent (or near pristine) ecological condition and still be considered as poor Big Game Habitat Condition? Without an understanding of how Big Game Habitat Condition was evaluated, it is difficult to comment to BLM's predictions of acreages which will improve or decline condition as a result of the various alternatives. In addition, the Board has no idea if the areas rated in less than good Big Game Habitat Condition have ever had the potential to be rated any higher.

8-5 Question 5: Does it appear reasonable to apply stream condition results to reflect the condition of adjacent riparian areas?

As presented in Appendix C of the RMP, the Bureau evaluates riparian habitat condition based on stream and aquatic area sampling results. Since the method evaluates an area specific only to the streambed and adjacent banks, it is unreasonable to extrapolate these results to also represent the condition of the adjacent riparian vegetation type. Therefore, if the stream is rated in poor

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condition due to an unfavorable pool-to-riffle ratio, the Bureau then extrapolates this poor condition to also represent the adjacent riparian vegetation condition. If this is the case, the AMP grossly misrepresents riparian vegetation condition ratings by applying unrelated results. The Bureau's riparian evaluation method is accurately termed a stream-fisheries habitat condition method. The riparian acreages proposed for protection (exclusion of livestock) under the various alternatives incorporate areas of vegetation not included within the area represented by the results of this method. Therefore, the BLM is misapplying stream/fisheries habitat condition results to represent riparian vegetation condition.

8-6 Question 6: Is it reasonable or necessary to exclude livestock from riparian areas which are rated in less than good condition because of undesirable pool-to-riffle ratios or [illegible] quality?

The AMP states that livestock will be excluded from less than good condition [illegible] riparian areas under the [illegible] alternatives. However, [illegible] of the 5 riparian condition [illegible] stream [illegible] stream gradient and other [illegible] grazing. The AMP indicates that if a riparian area is rated in fair condition because of undesirable pool-to-riffle ratio of the stream, then the area will be excluded from livestock grazing. The Board does not consider this a logical approach. It is doubtful that livestock grazing is the cause of an unfavorable pool-to-riffle ratio or that excluding livestock use will improve the ratio.

It should also be mentioned the BLM's riparian condition evaluation parameters are highly influenced by climatic conditions. For example, during an above normal runoff year, there will be a greater percentage of "riffles" for stream and a corresponding decrease in the percentage of "pools".

8-7 Question 7: Does it seem reasonable to exclude livestock for the purposes of improving riparian condition if the potential for improvement does not exist? As presented in Appendix C of the AMP, riparian condition is expressed in terms of the theoretical optimum. In this manner, a riparian/stream zone condition in Montana is rated by the same evaluation scale as a site located in Clark County. This is done without regard to stream gradient, geology, hydrology, etc. As a result, a stream zone evaluated by this method could be "poor" condition and never have had the potential to be rated any better. For example, a portion of the Mary's River riparian zone in Elko County was rated to be in "excellent" ecological condition, however, using the same methods portrayed in Appendix C the evaluation was "fair condition". Based on this

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example, it seems apparent that the riparian condition data presented in the AMP should not be taken at "face value".

The Bureau's riparian condition methods and results have some merit as descriptive tools. However, they do not involve the appropriate approach nor provide an adequate basis for justifying the exclusion of livestock.

8-8 The Board recommends that the Bureau clearly explain in the AMP the differences between riparian condition and ecological condition, the influence of natural factors (i.e., gradient, water volume, etc.), and the inherent difficulties of attributing the results of the data to livestock grazing. Not to do so is misleading to the uninformed public.

Finite Amount of Vegetation

The Board disagrees with the statement "Livestock, wild horses, and wildlife all compete for a finite amount of vegetation" (p.2-4). Vegetation is not finite, but is dynamic. Vegetation production and composition varies from year to year with changes in precipitation, growing season, etc. As a result, competition between herbivores for forage varies from year to year. Other parameters, such as winter severity, and drought, also influence the degree at which competition will occur.

No Action Alternative

8-9 According to p.1-3 the Bureau indicates that the AMP presents four reasonable alternatives (including the No Action). The Board questions the "reasonableness" of the "No Action" alternative as portrayed in the AMP. This alternative supposedly represents a continuation of present management.

8-10 Question 8: Does the Bureau consider the statement horses will be maintained at a specific number (p.5-5) a reasonable reflection of past and present management? Considering the fact that the BLM has never managed horses at any given level would indicate that this is not a reasonable assumption.

A more accurate appraisal of the present management would be that horses would continue to increase at an accelerated rate.

8-11 Question 9: Why is it expected that mule deer reasonable numbers would not be attained under the No Action Alternative? Reasonable numbers for mule deer represent a 10-20 year average of populations. Mule deer numbers have been considerably greater and also considerably less under the present management scheme within the resource area.

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8-12 Question 10: Why will no new AMPs or AMPs be implemented if the No Action Alternative is selected? If the No Action Alternative were to be selected as the proposed action and the RMP approved, there certainly is no reason why management plans could not be implemented and new planning initiated at the allotment level.

8-13 Question 11: Why will only a minimal number of range improvements be implemented under this alternative? Since major range improvements have been implemented under the existing management scheme, it would not appear reasonable to assume that the same would not be available in the future.

8-14 Question 12: Is not BLM required to implement a monitoring program and MFC classification of allotments according to policy regardless of the alternative (including the No Action) chosen?

The No Action Alternative serves an important role because 1) it is a viable alternative, and 2) it serves as a baseline in which to evaluate all other alternatives. NEPA (15:2.14) requires that all reasonable alternatives be objectively evaluated. The Board contends that the RMP does not objectively portray the No Action alternative.

MFC Allotment Classification

8-15 Question 13: Why was criteria discussing the availability of BLM manpower and costs for management not included on page 1-5 nor parameters for classifying allotments into M-I-C categories? It has been the Board's experience that this is an overriding parameter in determining the number of I category allotments, regardless of the resource conflicts, vegetation productivity, opportunities for improvement, etc.

8-16 Question 14: How will the implementation of grazing treatments on "custodial" allotments improve ecological condition and vegetation trend (p.2-20)? According to the Selective Management Criteria (Appendix A), custodial allotments do not have the capability of increased production, condition is not a factor, trend is static or improving, and the present management is either satisfactory or is the only logical practice. Based on Appendix A, it would appear to be unrealistic to implement grazing systems on "C" category allotments. In addition, the RMP appears contradictory by stating that condition and trend will improve on custodial allotments and that treatments are necessary (2-20), while Appendix C indicates that there is no capability to improve and that existing management is the only logical method to use the allotment.

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Riparian Fencing

8-17 Question 15: Is the exclusion of livestock grazing from riparian zones to be interpreted to mean "fencing"?

The Board generally agrees with the Bureau's discussion of implementing riparian improvement methods (p.2-32). However, a statement indicating that fencing will be used only as a last resort method should be included. Also, an indication of who will determine the appropriate riparian improvement applications should be discussed. It is disturbing to note that BLM has apparently predetermined where fencing is to be implemented (p.4-10) without input from other effected users or interested and experienced professionals.

8-18 Question 16: Has the Bureau already site specifically reviewed (as discussed on p. 2-32) the riparian areas to be fenced, or are the acres to be excluded from livestock grazing representative of worst case analysis?

8-19 Statement relative to economics of fencing

- Who will be imposed with maintenance?
- What effect on wildlife?
- Is BLM contemplating outright livestock reductions to alleviate what is perceived to be increased pressure on non-riparian areas. If so, has this impact to operators been properly analyzed through economic studies.

Wild Horse

The RMP downplays the current and potential damage to range resources caused by wild horses. While the RMP attributes range deterioration to livestock overuse and livestock improper season of use, there is only slight inferences that horses can cause similar problems.

8-20 Question 17: While p.3-11 discusses the potential impacts to forage from livestock grazing during the critical growing period, does the same premise apply to wild horses?

Considering that horse use is comparable or greater than livestock use on various allotments (Table 2-1) within the resource area and that horse use always occurs during the critical growth period, it should be clearly indicated that horses could be and certainly are responsible for range problems. Page 3-7 under "Livestock", states "past utilization problems and improper season-of-use has led to vegetation changes less productive for livestock grazing". If the Bureau considers this a reasonable statement, then a similar statement should be included under "Wild Horses" on page 3-4.

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8-21 Question 18: Can horse numbers be allowed to increase within the 1971 use areas and the resource still be protected?

According to the Preferred Alternative, horse numbers will be managed at 1982 levels. The RMP will be implemented in 1984.

8-22 Question 19: Can the Board assume that the 2 year increment (1982-1984) of horses will be removed from the Resource Area in 1984 if the preferred alternative is implemented?

Question 20: Are not the objectives to provide feed by way forage plants and to increase horse numbers under the Protection Alternative (p.2-19).

8-23 To maximize horse use under a protection alternative seems illogical. While the Board is aware of the Bureau's ELS approach to maximize various uses under the alternatives, it seems illogical to increase horse use under a Resource Protection Alternative. For example, the Washington Mountain Allotment experiences greater horse use than by livestock. Under the Resource Protection Alternative, livestock grazing would be deferred for months during the critical grazing period. However, horse numbers are allowed to increase during the critical grazing period that concentrate on areas presumed to be deferred. The Board contends that any benefits to be realized by eliminating livestock grazing during this period is lost by increasing horse numbers.

Economic Development Alternative

According to p.4-43, terrestrial wildlife habitat will not improve and 50 percent would decline if the Economic Development Alternative is implemented. For this reason, reasonable numbers would not be realized. P. 4-43 also states that the effects of livestock management recommended for the economic development alternative are similar to those under the preferred alternative, except that increased livestock use would offset these benefits. The following table is based on the data provided in the RMP:

8-24 Question 21: Based on the data presented in the RMP is a 1 percent difference in horse/livestock AUM demand between the preferred and economic development alternatives significant enough to affect the achievement of Reasonable Numbers?

Question 22: How can 50 percent of terrestrial wildlife habitat decline, when there is no corresponding decline in range conditions and trend (in fact there is improvement)?

The Board contends that Bureau has not been objective nor reasonable in its portrayal of Environmental Consequences of the alternatives. According to the RMP, ALM demand is very comparable (in

Comment Letter 8

	Preferred Alternative	Economic Development Alternative	Comparison
Long term horse and livestock demand	309,744 AUMs	316,440 AUMs	2% greater AUM demand under Economic Development Alt.
Additional livestock forage available from seedings	5,400 AUMs	8,200 AUMs	2,800 AUMs more available under the Economic Development Alt. Considering the additional available AUMs, there is only 1% difference between alternatives.
Improvement in Range Condition	+9%	+9%	Equal
Improvement in Range Trend	+12%	+11%	Essentially equal
Declines in Condition and Trend	0	0	Equal
No. of AMPs	5	5	
Impacts of management actions designed to meet objectives	—	—	(p.4-47) Impacts are the same

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reality, the preferred alternative AUM demand would be greater than economic development alternative since it is very unlikely that all permittees will ever use full active preference), management actions are very similar (p. 4-47), and the improvement in condition and trend are similar under the two alternatives. However, reasonable numbers will be attained under the preferred alternative (Significant Benefit) and not under the economic Development alternative (Significant Adverse Impact).

Costs Associated With Alternative Implementation

Tables 2-2, 2-3, and 2-4 provide data concerning the costs associated with implementing all the alternatives except the No Action. However, the No Action Alternative is deserving of equal analysis and consideration as the other three alternatives. The RMP states "The No Action Alternative provides a useful benchmark by which to measure and assess the environmental consequences of the other alternatives" (p.2-29). The Board emphatically agrees. Therefore, it is extremely important to know what current funding for livestock improvements, water habitat projects, and wildlife projects have been in order to evaluate the merits of all four alternatives. NEPA states:

> "1502.14a. Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewing may evaluate their comparative merits."

8-25 Question 22: Why was a table similar to Tables 2-2, 3, and 4 not prepared for the No Action Alternative?

Five Year Average Use

8-26 Question 23: What data specific to the Shoshone-Eureka Resource Area supports the contention that the permittees have been licensing at less than active preference because of decreased productivity of the rangeland (p.3-71? The Board admittedly opposes such a statement and requests that it be removed. It is unreasonable to assume that voluntary reductions in stocking levels are the result of inadequate or unavailable forage. Every permittee has a personal opinion concerning optimum herd size for his operation. Optimum herd size can be dependant upon private ground production, Forest Service permits, tax liabilities, financial position, local labor conditions, unfavorable market conditions, implementation of an AMP, etc.

8-27 Question 24: Is the five year average use presented under the preferred alternative for analysis purposes only? If the five year average use is a steadfast recommendation for implementation, a permittee's flexibility in running his operation as he sees fit

Comment Letter 8

is greatly hindered by the federal government's involvement. The Carson City BLM responded to a similar comment in the Mono EIS by stating:

> "The three year average use was used for analysis only and would not or could not, be required as a stocking rate. Any permittee is free to activate his non-use at any time unless emergency conditions such as fire or flood were to preclude it. There is no basis to hold a permittee to the past three years active use, as this could be a reduction in preference and would require a District Manager decision with resultant appeal rights. There, of course, is no correlation between active use and proper stocking rate, and without proper data a reduction in preference would not stand up in court."

AFFECTED ENVIRONMENT

Economic Characteristics

8-28 Table 3-8 reflects data valid as of 1980. No indication is made as to whether the data presented in the table remains valid in 1982-1983. For example, BLM grazing fees of $2.36/AUM were used in the original Resource Concepts, Inc., study from which Table 3-8 is taken. No effort has been made to adjust the 1980 budgets to reflect current production costs and revenues such as grazing fees and cattle prices. It is believed that a properly adjusted budget reflecting current conditions would show significantly reduced revenues and greater levels of cash cost presently being incurred.

On page 3-39 the following statement occurs:

> "Historically, the economic benefits derived by area ranchers from the use of public range have exceeded the fees they were charged. The existence of this imbalance, or "consumer surplus" has meant that ranchers are willing to pay extra for the opportunity to use public lands, thereby causing the grazing permit to acquire a market value."

The actual cost associated with harvesting an AUM of forage from BLM lands within the Shoshone-Eureka Resource Area is equal to the grazing fee plus other costs. Without these other costs being incurred, the value of an AUM may well be zero. Therefore, to imply, as the previous statement does, that ranchers can afford to pay more for public land grazing is misleading.

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On page 3-28 the following statement occurs:

> "At an average value of $50 per animal unit month, Bureau grazing permits themselves contribute $15,028,800 to the wealth of area ranchers."

8-29

This statement may tend to mislead readers into thinking that the Bureau has made area ranchers wealthy, when in fact, it has taken significant levels of private investment and operator management skills to cause the grazing permits to obtain their stated capitalized values. The capitalized value of an AUM as provided by the BLM (currently $1.43 x 4 = $5.72) is significantly lower than $50. Area ranchers then, have contributed much to their own wealth than have the BLM grazing permits themselves.

Environmental Consequences

8-30

Under the section entitled Analysis Assumptions (page 4-2), the last indicates under the second assumption that implementation of the RMP would begin in 1984. With this in mind, it is important to note that the removal of some BLM rangeland improvement policy will effectively shift all range improvement maintenance and many improvement investment costs to permittees beginning in 1984. This may result in significantly greater costs of production to area permittees. The added burden of these costs does not appear to have been considered within this Draft EIS. Without consideration of these costs, this document fails to allow the reader the ability to evaluate how implementation of the RMP will affect permittees within the area.

Page 4-20 includes a statement which indicates that individual ranchers could not be significantly impacted. It is possible that individual ranchers may lose significant numbers of AUM's from land withdrawals. Although non-range feed may become available to offset lost AUM's, the cost of this forage will certainly be significantly greater than public land forage. Significant impacts to individual ranchers may occur depending upon specific actions ultimately implemented under the guidelines of the Shoshone-Eureka RMP.

In general, it is argued that the economic impact analyses do not accurately account for current and/or expected costs and revenues for livestock production and, therefore, do not allow the reader the ability to compare the positive and negative impacts between alternatives. The ability to select the best strategy for managing the Shoshone-Eureka Resource Area is impaired as presented in this document.

Should you have any questions in regards to these comments, please feel free to contact me.

RESOURCE CONCEPTS INC.
[illegible]

Comment Letter 9

HOMESTAKE
MINING COMPANY
[illegible]
P.O. BOX [illegible] • RENO, NEVADA [illegible]
[illegible]

August 18, 1983

U.S. Department of the Interior
Bureau of Land Management
Battle Mountain District Office
P. O. Box 194
Battle Mountain, NV 89820

Attention: Mr. H. James Fox, District Manager

RE: Comments on Draft Shoshone - Eureka RMP and EIS

Dear Mr. Fox:

During the past few weeks several members of our Reno exploration staff have reviewed the Draft RMP/EIS referenced above. The Draft generally contains a good overview of alternatives developed for future management of BLM public domain lands in the Shoshone-Eureka Resource Area. We would, however, like to provide the following comments with particular emphasis on the wilderness suitability aspects and recommendations that will arise from the EIS development process.

The "Preferred Resource Management Plan" alternative appears to be an acceptable course of action in most respects with the exception of the recommendations for wilderness designation of the Roberts Wilderness Study Area (NV-060-541). As you are no doubt aware, the present boundary of the Roberts WSA includes a significant portion of the Antelope Mining District. This mining district was discovered during the early operations at Eureka and small productions of silver, lead and zinc have been reported (Nevada Bureau of Mines Bulletin 64; U.S. Bureau of Mines, Minerals Yearbook, 1950). Additionally, antimony and barite have been discovered in the area. Although historical production from the district has been quite small and not well documented, the general geology of the area indicates the potential for economic mineralization in several commodities.

Overall, the Roberts WSA lies over a window of "Lower Plate" limestones and other sedimentary rocks that are partially surrounded by "Upper Plate" cherts and argillites which have been thrust over the underlying limestones. This geologic setting is of particular importance as it is similar to the host rocks for many of the low grade, bulk tonnage gold mines found in the region (i.e. Cortez, Carlin, etc.). Active mineral exploration continues in

[illegible] GLENDALE AVENUE • SUITE 10 • SPARKS, NEVADA [illegible]

Comment Letter 9

the Antelope Mining District and it is interesting to note the recent Tonkin Springs gold discovery by Precambrian Exploration, Inc. (In March 1983 announced reserves were 1.7 mm tons at 0.1 ounces per ton gold - George Cross News Letter No. 51 and No. 52, 1983). Their discovery in this area emphasizes the importance of mineral potential in the Antelope District and the possibility of additional economic discoveries in the future.

Based upon the foregoing comments, we feel that the mineral resource potential within the Roberts WSA warrants serious consideration as an important aspect of the area. Further mineral exploration would be adversely restricted and/or prevented should the area be ultimately included as part of the Wilderness System. Consequently, it is felt at this time that the Roberts WSA should be recommended as non-suitable for wilderness designation.

Thank you for allowing us to comment on the draft RMP/EIS and we hope that our input will aid in the decision making processes for the management of public lands in the Shoshone-Eureka Resource Area.

Sincerely,

Alan D. Cox

Alan D. Cox
Regional Manager -
Environmental Affairs

ADC:jmg
11-26

9-1

Comment Letter 10

SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO: ☐ _____ ☐ GREAT BASIN GROUP P.O. Box 8096 University Station Reno, Nevada 89507 ☐ LAS VEGAS GROUP P.O. Box 19777 Las Vegas, Nevada 89119

720 Brookfield Drive
Reno, Nevada 89503
August 19, 1983

Mr. H. James Fox, Manager
Battle Mountain District BLM
P. O. Box 194
Battle Mountain, NV 89820

Dear Mr. Fox:

Thank you for the opportunity to comment on the Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement. I also appreciate the additional information sent to me by Mr. Neil Talbot, Area Manager. This letter will supplement the oral statement I made as Toiyabe Chapter Conservation Chair at the July 28 public hearing in Reno.

On the wilderness issue, we enthusiastically support the preferred alternative on the Roberts Mountain WSA and the Antelope WSA. Roberts has long been recognized as an extremely important primitive recreation area and scenic resource. Both the topographic contrast of peaks and canyons and the vegetative diversity--grasslands, aspen groves, dogwood, mountain birch, mountain mahogany, liber pine--gives this area a unique quality that can usually be found only in much larger areas. The area is also outstanding geologically and has been the focus of much research. If wilderness status is recommended, a thorough study of the mineral values and other geological potential will be made by the U.S.G.S.

The Antelope WSA is far less known and more isolated than the Roberts. Although at present it is seldom visited, it does have outstanding opportunities for primitive recreation such as hiking, horseback riding, and hunting, plus untrampled spring meadows and many cultural sites. The boundary recommended in the Preferred Alternative should eliminate any unnatural areas on the east side of the WSA. There should be few conflicts since the area has low mineral potential and no private inholdings.

10-1 The Simpson Park WSA was not recommended for wilderness in the preferred alternative because of private inholdings causing manageability problems and mineral potential and mining claims in the northern part. However, because there are almost

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

Comment Letter 10

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

10-1 50,000 acres in the WSA, it should be possible to draw a boundary on the north that would eliminate the majority of the conflicts, provide a manageable wilderness, and preserve the outstanding solitude and primitive recreation values to be found here. Roger Scholl, Chair of the Chapter Wilderness Committee, will send you a specific boundary on a map plus additional comments on the wilderness aspect of the Draft EIS.

On several of the non-wilderness issues identified, we believe that the Resource Protection Alternative would be a far better choice than the Preferred Alternative, in that sensitive resource values would be better protected and preserved. One of our principal concerns is with the condition of the riparian and aquatic habitat in the resource area. Even the Resource Protection Alternative still leaves 45.1 miles of streams and 690 acres of riparian habitat in poor condition, although it is better than the preferred alternative and far better than the other alternatives. In order to accomplish changes in riparian condition, livestock need to be at least temporily excluded from the areas where they have had a cumulative environmentally degrading effect. Consequently, there needs to be some cut in AUM's, not an increase of three percent as proposed in the Preferred Alternative. The fifteen percent short-term cut (nine percent long-term cut) in the Resource Protection Alternative would also suspend livestock grazing on spring ranges and allow species to increase growth and vigor, resulting in a long-term nineteen percent improvement in ecological condition of the range. This small decrease in grazing should not cause extreme economic harship since it seems to be well distributed throughout the various RCA's. Perhaps some adjustments would need to be made in some allotments in hardship cases.

At the same time we favor leaving the wild horses at the current number of 1660, as recommended in the Preferred Alternative, since an increase in numbers is not compatible with the condition of the range. We also favor water developments insuring year-round available water both for horses and wildlife.

SIERRA CLUB
Toiyabe Chapter - Nevada and Eastern California
PLEASE REPLY TO ☐ _____
☐ GREAT BASIN GROUP P.O. Box 8096 University Station Reno, Nevada 89507
☐ LAS VEGAS GROUP P.O. Box 19777 Las Vegas, Nevada 89119

On the cultural resource issue, we prefer the Resource Protection Alternative protecting 2154 cultural sites with 309 sites disturbed. From statements in the document we conclude that if less woodlands were harvested, less cultural
10-2 sites would be disturbed. Two thousand cords of fuel wood and 2100 Christmas trees proposed in the Environmental Protection Alternative, would seem sufficient for the population in the Shoshone-Eureka area. We are not sure why 6000 juniper posts would be needed by the local public.

One of our greatest concerns about the Preferred Alternative is the large amount of public lands slated for disposal. The 17,650 acres in the Resource Protection Alternative seems sufficient to take care of community growth and small, unmanageable parcels. In particular we question the disposal of
10-3 6760 acres in T24N, R41E, the 11,560 acres in T25N, R41E, the 11,810 acres in T19N, R43E (except the areas immediately adjacent to Austin), the 3820 acres in T26N, R43E, the 4540 acres in T16N, R44E (except near Kingston), the 1140 acres in T22N, R51½E, and the 6970 acres in T22N, R52E. The last two seem to be on Garden Pass Creek according to your map, and we do not believe riparian areas should be sold.

The majority of these lands should be used for "trading stock" to acquire environmentally sensitive private lands (for example, the inholdings in the south part of the Simpson Park WSA or the private lands along Salmon Creek and Campbell Creek near the Desatoya WSA.) The public loses when large acreages of public land are sold and the monies obtained go not to the district but disappear in the general fund.

Please send us a copy of your management decisions and the Final EIS when they are available. Thank you again for the opportunity to participate in this important process.

Sincerely,

Marjorie Sill

Marjorie Sill
Conservation Chair

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

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

August 22, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 196
Battle Mountain, Nevada 89820

Dear Mr. Fox:

The Wildlife Management Institute is pleased to comment on the DRAFT SHOSHONE-EUREKA RESOURCE AREA GRAZING PLAN and ENVIRONMENTAL IMPACT STATEMENT, Nevada.

11-1 There is no significant detail on range management. Only 5 allotment plans (system not specified) are to be prepared for a resource area where the primary system now is year-long grazing. The initial stocking will be raised 3 percent (7,216 AUM) above the 5 year licensed use. All existing range data are apparently to be thrown out and future stocking rates developed by monitoring and consultation with permittees. These actions are supposed to result in significant wildlife and riparian improvements. Such assumptions are unacceptable without much more detail on grazing and on other land uses, including wildlife.

11-2 The Nevada Department of Wildlife should be involved in monitoring. We found a buried number of existing mule deer summer use (8,000 page 3-2). No winter population is given, yet BLM proposes to sell 11 percent of one important winter range (page 4-6). There is no discussion or tabulation of the effects asset management will have on crucial wildlife habitat.

Some calculations on range improvements are presented:

Number of Operators	64
Improvement Cost	$1,295,000
Short term AUM created	7,216
Long term AUM created	26,527
Cost of a new long term AUM	$49.80
@ 8% interest per year	$ 3.92
U.S. Income from grazing fee	$ 1.40
Annual Subsidy per new AUM	$ 2.52
Average subsidy per permittee from Range Developments	$20,234

In addition, an AUM is worth $50 on the value of the ranch (page 3-28). This is based on grazing preference. It is not proposed that this level be reached by this plan. However, the new long term AUM created will enable the permittees to avoid losing $1,326,350 of ranch value or another subsidy of $20,724 per permittee.

We believe Simpson Park should be classified as wilderness.

11-3 The first livestock-use objective (page 2-12) is "To initially manage livestock use at existing levels and determine if such use can be maintained." The plan does not follow this objective--there is an initial 3% percent increase.

Some specific comments follow:

11-4 Page 2-23, No. 15. "Wherever feasible". These imprecise words will preclude wildlife water in rested pastures.

11-5 Page 2-37, No. 22 to 25. No mention is made of wildlife stipulations in the harvest of woodland products.

11-6 Page 4-2, No. 6. If data are not adequate for making forage allocation decisions, how come they can be used to increase livestock use by 7,216 AUM? (page 4-8)

11-7 Page 4-18, 1st paragraph. Hunter days will increase 33 percent, but there is no detail of habitat improvements to justify this. On the other hand, grazing will increase 11 percent and a minimum of riparian areas will be fenced. Grazing systems are not described. We cannot accept this wildlife hunting projection.

Comment Letter 10

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

PLEASE REPLY TO ☐ _____ ☐ GREAT BASIN GROUP P.O. Box 8096 University Station Reno, Nevada 89507 ☐ LAS VEGAS GROUP P.O. Box 19777 Las Vegas, Nevada 89119

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Marjorie Sill

Marjorie Sill
Conservation Chair

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

Comment Letter 11

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

[boilerplate boards of directors]

August 22, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nv. 89820

Dear Mr. Fox:

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Comment Letter 11

There has been no mention of livestock trespass, a common problem under year-long grazing.

These remarks have been coordinated with William B. Horse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:mem

Comment Letter 12

United States Department of the Interior
GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
EGS-Mail Stop 423
DES 83-40

SEP 8 1983

Memorandum

To: District Manager, Bureau of Land Management
Battle Mountain, Nevada

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement and resource management plan for Shoshone-Eureka Resource Area, Lander, Eureka, and Nye Counties, Nevada

We have reviewed the subject documents as requested in the State Director's notice of July 14.

12-1 Despite mention of well development, stream improvements, guzzler installation, and spring development (p. 2-16 and 2-17, table 2-3; p. 2-23 and 2-24, table 2-4), information on ground- and surface-water conditions of the resource area are not described. We believe that the proposed plan would benefit from a summary of the typical occurrence of ground water relative to well and spring development and of the surface-water regime of the study area. Also, the potential for either adverse or beneficial effects on water resources that may result from each alternative should be assessed.

We have given only the most cursory review to the minerals data included in this report because the U.S. Geological Survey will prepare a comprehensive, detailed, joint report with the Bureau of Mines on the mineral resource potential of those areas recommended as suitable for wilderness, in accordance with Section 603 of FLPMA.

for James F. Devine

Comment Letter 13

United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

L7619(WR-RPE)

September 7, 1983

Memorandum

To: District Manager, Bureau of Land Management, Battle Mountain, Nevada

From: Associate Regional Director, Resources Management and Planning, Western Region

Subject: Review of Draft Shoshone - Eureka Resource Management Plan and Environmental Impact Statement (DES-83/40)

In accordance with June 14 request by the State Director, Bureau of Land Management, Nevada, we have reviewed the subject document and have no comments to offer.

cc:
NASO (762)

13

Comment Letter 14

The Wildlife Society

Nevada Chapter

September 13, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

Dear Mr. Fox:

Please find attached a copy of the comments which we submitted for the Shoshone/Eureka RMP during the scoping process.

The draft Shoshone/Eureka RMP is well organized and all section work together providing a format that is easy to follow.

14-1 The Nevada Chapter of The Wildlife Society is concerned about the land tenure adjustment program as presented within the RMP. There is considerable discussion on selling land but none on acquiring land. A complete land adjustment program should provide for both disposal and acquisition. Undoubtedly, there is critical wildlife habitat within the Shoshone/Eureka Resource Area that would be better managed under public ownership. Part of the land adjustment program seems to be based on the ability of private landowners to acquire certain lands. The Nevada Chapter requests the same opportunity for important wildlife habitat to be acquired by the BLM under a land adjustment program.

The discussion of woodland management for the most part is excellent. However, pinyon-juniper serves other purposes than the production of wood products. Numerous wildlife species are considered obligates of the pinyon-juniper woodland type. Examples include the pinyon jay, plain titmouse, pinyon mouse, common bushtit and screech owl. Pinyon-juniper woodlands also provide necessary thermal cover for wintering mule deer and pronghorn antelope.

14-2 It appears that under the short term management actions, livestock numbers would be increased over the present actual use. How can this be justified in lieu of the problems identified within the RMP regarding rangeland condition and trend, as well as, concerns for riparian areas?

14-3 We are concerned at the minimal amount of both aquatic habitat (miles of stream) and acres of meadow that will be maintained in good or better condition. In fact, as written under the preferred alternative, none of the streams in poor condition would have to be improved. The same thing holds true for meadows. We find this abdication of responsibility to these critically important wildlife habitats to be an inappropriate posture for an agency charged with the management of our public lands. For further detail on the Nevada Chapter's position on the management of riparian areas, please refer to the attached position statement on Riparian Habitats.

The International Organization of Professional Wildlife Ecologists and Managers

14

Comment Letter 14

The Nevada Chapter of TWS also poses the following questions which are unanswered in the document:

14-4 (a) What are selected riparian areas and how were they selected?

14-5 (b) Did the BLM involve other resource management agencies and concerned public groups in the selective rangeland management process? It seems that with the emphasis the BLM places on CRMP that selective management should be included in the CRMP process.

14-6 (c) Under standard operating procedure Number 22, what are considered to be sound forestry and conservation practices?

14-7 (d) How can the ecological condition and vegetation trend improve on the custodial allotments where management will be nonexistant?

14-8 We do not agree with standard operating procedure Number 15. It is state law that water must be provided at the source of springs and seeps (NRS 533.367).

14-9 We don't agree with your finding that impacts to water quality and soils have been determined to be insignificant. Information displayed in Table 3-1, shows that substantial miles of streams and acres of meadow are in poor condition. How can areas be in poor condition and there be insignificant impacts to water quality and soils?

Land sales within the Eureka resource conflict area that would adversely affect mule deer winter range should be deleted from further consideration.

The Nevada Chapter appreciates the opportunity to review and provide comments of the draft Shoshone/Eureka RMP. We hope that you will find our comments of value in helping to produce the most responsive and sound resource management plan for this area.

Sincerely,

William A. Molini

William A. Molini
President

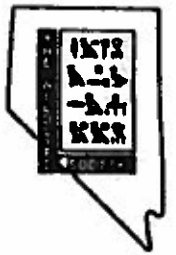
WAM/BM:mp

cc: Nevada Chapter Executive Board
Western Section President
Bob Mason
TWS Field Director

Comment Letter 14

The Wildlife Society

Nevada Chapter



RIPARIAN HABITATS

A POSITION STATEMENT BY THE NEVADA CHAPTER OF THE WILDLIFE SOCIETY

September 1983

INTRODUCTION

Riparian habitat has been the most controversial wildland feature in Nevada in the past decade, and seldom has such a small part of the wildlands created so much discussion and concern. What riparian habitat is, why it is so important, and why and how it should be managed will be discussed in this statement.

The Nevada Chapter of The Wildlife Society is a non-profit organization comprised of professional wildlife biologists from state and federal governmental agencies and private interests. The Society is dedicated to the wise management and conservation of the wildlife resource and the habitat upon which all wildlife rely for life. Ecology is the primary scientific discipline of the wildlife profession; and, therefore, the interests of the Society embrace the interactions of all organisms with their environment. The Society recognizes that man, as well as other organisms, has a total dependency upon the environment and it is the Society's belief that wildlife, in its myriad forms, is basic to the maintenance of a quality human existence.

The terms riparian habitat or riparian vegetation may be defined as any vegetation normally associated with standing or flowing surface water; vegetation which requires free or unbound water, or conditions that are more moist than normal (Franklin and Dyrness 1973, Minore and Smith 1971). Riparian vegetation in Nevada includes quaking aspen, cottonwoods, willows and rosebushes found along meadows, streams, rivers, and ponds, and marshland vegetation such as cattails and bulrushes.

Water is the key to riparian habitats, and where there is no water, riparian habitat does not exist. Water is probably the single most important habitat component for wildlife. There are few wildlife species which do not require drinking water, and water is essential to domestic livestock. Water in Nevada is also critical to human well-being and is used for domestic purposes, mining and irrigation. Thus water, and the riparian habitats associated with it, is vital to a wide variety of users and uses.

Riparian habitats are typically very small in size, usually covering less than four or five acres. Such areas may be aspen groves or narrow bands of cottonwood trees extending for several hundred feet along the stream edges. Willow dominated riparian habitat may be only two plants wide, one on either side of the stream, and up several miles in length. Riparian areas may also be small stringer meadows, two to five feet wide on both sides of the stream and often several hundred feet long.

In total acreage, riparian habitats are miniscule when compared with the surrounding vegetation. The Bureau of Land Management (U.S. Department of the Interior) has documented that riparian zones cover less than one percent of the rangelands managed by the Bureau (Almand and Krohn 1978, Baxter 1981, Bureau of Land Management 1981a, 1981b, 1982, 1983). Riparian areas, although still very restricted, comprise a slightly larger percentage of Forest Service lands and private lands.

Riparian habitats provide structural diversity, edge effect, shade, and moderate temperatures. Structural diversity means that the riparian vegetation is much taller, wider and/or thicker than the surrounding vegetation. Examples of such structure include cottonwood and aspen trees with their tall trunks and spreading branches; willows and rosebushes that are almost impenetrable with dense growth; and meadow vegetation dominated by grasses and forbs. For wildlife, such structure provides places to nest, perch, feed, reproduce, hide, travel, and escape, while surrounding vegetation does not provide such habitat for most wildlife species. The number of wildlife species which use riparian habitat, compared with the surrounding vegetation, is considerable. Thomas et al (1978) reported that of 367 vertebrate species known to live in the Great Basin Desert of southeastern Oregon, 288 or 78 percent used, or were dependent upon, riparian habitat. In perspective, three-quarters or more of the wildlife species in Nevada use or depend upon less than one percent of the total rangeland area. This high wildlife use of riparian habitat is partially attributable to "edge," where two different habitats meet. Examples are the edges between riparian and sagebrush or riparian and pinyon-juniper. These areas support more wildlife species, wildlife numbers, plant species, and plant numbers (Dasmann 1964), than do the more single species dominated plant communities.

Shade and reduced temperatures go together in the summer months. Riparian habitat, with its different vegetation and presence of water, attracts not only wildlife, but livestock (particularly cattle), and wild horses and burros. People are also attracted to riparian areas for a variety of recreational activities.

Food is another significant value provided by riparian habitats. Most of the wildlife species which use these habitats find increased food supplies, including more nutritious vegetation, and higher densities of animal prey. Riparian habitats are very attractive to livestock as well, because the grass is more succulent and palatable for a longer period of time than in the surrounding drier areas. Even man finds usable food sources such as wild rose hips, elderberries, and chokecherries in riparian areas.

Comment Letter 14

Riparian habitats, particularly those of linear nature, provide wildlife with protected travel corridors between other habitat types. Wildlife usually use such corridors while making seasonal or daily movements across otherwise open areas. This cover component is especially important to small mammals and birds. Another valuable habitat component common in riparian areas is standing and down, dead trees. A wide variety of birds including sparrow hawks and woodpeckers use dead tree trunks for nesting.

Fisheries and stream quality will not be discussed in detail in this position statement for the following reasons: (1) Much investigative work has been done by fisheries and range professionals on this topic and these are well summarized by Platts (1982); and (2) the American Fisheries Society, Western Division, has prepared a position paper on management and protection of western riparian stream ecosystems (Duff et al 1980).

PRESENT SITUATION

Since riparian habitat is so small in size, yet so important to many users, the considerable use demands have often stressed this unique habitat to the point of degradation in quality and quantity with a consequent loss of value for all uses. Impacts on riparian habitats have been so great as to eliminate much of the habitat that existed prior to the advent of European man on this continent. Up to 90 percent of all riparian habitat in the United States has been either eliminated or degraded to the point that it can no longer be classed as riparian habitat (Council on Environmental Quality 1978). Specific causes of this degradation are discussed below.

1. Mining

Mining has caused a great deal of damage to riparian habitats. Streams have been channelized, eliminating streamside vegetation; spoils and tailings have been dumped into streams, burying and destroying live vegetation including large trees. The results have been the elimination of shade and structural diversity with a consequent loss to all other users. Some mining operations have allowed mine wastes to flow into streams, not only killing vegetation, but fish and other aquatic life as well.

2. Water Development and Irrigation

When water is diverted from a stream and used for irrigation, domestic purposes, or mining, adverse impacts can result. These impacts include the elimination of drinking water for wildlife, livestock, and people. Water diversions from the natural stream channel often result in a significant reduction of riparian habitat along the stream channel. Irrigation return flows to streams often contain pesticides, nutrients, or sediments which can reduce the quality of stream for fisheries (Duff et al 1980).

Comment Letter 14

3. Livestock Grazing

Livestock grazing has had the single greatest influence on riparian habitats in Nevada. The same attributes which attract wildlife species also attract livestock, particularly cattle. Sheep, horses, and burros also use riparian areas, but because of their behavior or herding practices, they do not remain near the water for extended periods as do cattle. Cattle will stay along the streams or at the water sources until available forage is depleted. This pattern of use applies regardless of the number of cattle. It is for this reason that current grazing management practices, including rest-rotation grazing, have had little success in addressing the needs of riparian areas. Such systems are generally designed for the drier areas away from water where they have worked well, but little consideration has been given to riparian areas because of their limited size. When cattle continue to graze these areas year after year, the grasses and forbs underneath the trees are the first to be eliminated. Then young sprouts of aspen, cottonwood, and willows are eaten, precluding any opportunity for them to grow into full sized trees.

To date, there has not been a grazing system implemented which can be applied simultaneously to both riparian and upland habitats and which does not result in some degradation of the riparian habitat. Much has been said and written in this argument; however, to our knowledge, a grazing system that will substantially improve riparian habitat has not been demonstrated. Degraded upland riparian habitats have, however, shown improvement when grazing has been held to moderate levels on key species within the riparian zone.

Tree species such as aspen are relatively short-lived (80 years or so) and when these adult trees die because of old age, fire, or beaver activity, there are generally no young trees available for replacement in heavily grazed riparian zones. This occurrence has severe impact on riparian habitat.

Certain species with very restrictive habitat requirements, such as the yellow billed cuckoo which make their homes in the thick understory vegetation found beneath cottonwood trees along watercourses such as the Carson and Truckee rivers, have been strongly impacted by degradation of riparian habitats. Yellow billed cuckoos were very common in the 1940's, but since then have been reduced to near zero with the loss of habitat (Hoppe and Klebenow 1973).

The majority of riparian habitats in Nevada have been heavily utilized by livestock. For example, of the 390-plus small habitats surveyed in the Ruby environmental statement area in western Nevada, 56 percent were heavily utilized by livestock and wild horses (Bureau of Land Management 1982). These small habitats included: springs/seeps; tree clumps including aspen, cottonwood, and mountain mahogany; meadows; and other riparian habitat. Baxter (1982) reported 54 percent of the small habitats near Battle Mountain were excessively grazed and trampled.

4. Road Construction

Road construction is usually associated with public transportation, mining or livestock management. Roads in riparian habitat are usually detrimental to the habitat and associated wildlife. Not only do roads destroy habitat (and this can be severe if the road is constructed in a long, narrow riparian zone) for terrestrial wildlife, but they often impact, and may even eliminate fisheries habitat if a stream course is changed or channelized. If a road receives substantial traffic, considerable disturbance to the wildlife species using the area is likely to occur.

5. Firewood Harvesting

Currently most of the firewood harvested in Nevada riparian habitats is cottonwood or aspen. The value of these trees as wildlife habitat exceeds their monetary value as firewood. Dead standing trees or snags are extremely important for cavity nesting birds and offer feeding, perching, and resting sites for such species as the mountain bluebird, common flicker, house wren, sparrow hawk, and tree swallow. Down trees offer habitat for other birds, and small mammals such as deer mice, cottontail rabbits, and wood rats.

6. Recreational and Other Human Uses

Human activity in most riparian habitats has negative effects, and riparian habitats are receiving increased human use demand. Such birds as goshawks, which nest in certain aspen habitats, are easily displaced by people, with a consequent loss of the birds themselves because of reproductive failure. This situation exists in the Pine Nut Mountains near Carson City (Herron, personal communication 1980) and elsewhere. The situation is aggravated because more and more people are using riparian habitats for longer periods of time, resulting not only in disturbance of wildlife, but in actual habitat destruction. Common human impacts include the removal of trees for firewood, ground clearing for fire rings, campsites, vehicle trails, and foot paths.

Amidst the current generally poor condition of remaining riparian habitats, there is opportunity for improvement. Legislation passed in Oregon and signed into law in 1981 directed the Oregon Department of Fish and Wildlife to work with county tax assessors to develop and implement programs to maintain or enhance streamside (riparian) habitat. The Oregon legislation consists of two distinct programs. The first contains provisions for complete property tax exemption for qualifying lands, and the second provides for a personal income tax credit for certified habitat improvement projects on private lands. In Section 1 of the Act, the Oregon Assembly declared: "That it is in the best interest of the State to maintain, preserve, conserve, and rehabilitate riparian lands to ensure the protection of the soil, water, fish, and wildlife resources of the state and its citizens. The legislative assembly declares that riparian habitat maintained in a healthy condition is a legitimate land use that contributes to erosion control, improved water quality and prolonged water flow...."

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RECOMMENDATIONS

The following recommendations are offered by the Nevada Chapter of The Wildlife Society for protecting and improving riparian habitats. This Chapter's position is that all of these recommendations are necessary if riparian habitats are to be recognized as significant features of rangelands and managed in a manner which recognizes their multiple values and benefits.

1. Coordination with all affected users is essential. Successful management of riparian area, particularly by public land management agencies, is largely dependent upon coordination with, and commitment by, all interested and affected parties. Riparian management on private lands is also extremely important but is at the discretion of the landowner.

   With the initiation of Coordinated Resource Management Planning (CRMP), representatives of all affected user groups have an opportunity and forum to meet together, identify issues or problems on particular parcels of land, and set objectives and management actions to maintain the basic productivity of the land. While this system is not perfect, it is an excellent process for identifying issues and resolving them through user involvement. The Nevada Chapter supports this approach and recommends that it be used whenever possible for riparian habitat management. We encourage the inclusion of private lands in this process, provided the private landowner is agreeable to participate. In particular, recreationists, wildlife biologists, range managers, livestockmen and miners should be included in this management and planning process.

2. The Nevada Chapter urges the land managing agencies, in concert with public law, to recognize the importance of riparian habitats on public lands and then implement management which will maintain and enhance riparian area for their many values.

3. The Nevada Chapter recommends that livestock grazing systems recognize riparian habitats as key or special areas, and specific grazing management be tailored to address the needs of these areas. Since no two riparian habitats are exactly alike, each grazing system or allotment management plan should be tailored to the specific riparian habitats within it. We agree with Ames (1977) that fencing is currently the best practical means for protecting riparian habitat from grazing overutilization. The Nevada Chapter does not advocate total livestock exclusion, but instead recognizes the importance of water gaps, and limited grazing within fenced areas.

4. An excellent discussion of sound management practices for all uses/users is found in the publication "Best Management Practices for the Management and Protection of Western Riparian Stream Ecosystems," prepared by the Western Division, American Fisheries Society (Meehan et al 1982). The Nevada Chapter fully supports the practices covered in detail in this publication.

5. The Nevada Chapter supports continued research which will lead to the development of livestock grazing systems which will enhance riparian values without excluding livestock.

6. The Nevada Chapter supports legislation for Nevada which recognizes the many values of riparian habitat and the need for its perpetuation and enhancement. Such legislation could be the basis for state regulations affecting mining, livestock grazing, water diversion, recreation, and road construction in and through riparian habitats. The Oregon legislation might be used initially as a model for such legislation in Nevada.

7. We support public education of all users of riparian habitat, particularly recreationists, miners, and livestockmen. Educational efforts should focus on the values of riparian habitat, what uses impact it, and what remedies are available to improve and maintain these unique areas. Active education programs about riparian habitat management in the form of slide presentations, tours, and symposia should be offered by the BLM, USFS, University of Nevada Extension Service, The Wildlife Society, Society for Range Management, and American Fisheries Society.

Finally, the Nevada Chapter of The Wildlife Society accepts its responsibility in this arena, and offers assistance and consultation to any persons or groups interested in riparian habitat management.

William A. Molini
Chapter President

Comment Letter 14

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Natural Resources Defense Council, Inc.

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September 16, 1983

H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain NV 89820

RE: Shoshone-Eureka Resource Management Plan/Environmental Impact Statement

Dear Mr. Fox:

I have reviewed the draft RMP/EIS for Shoshone-Eureka and submit these comments on its range and wildlife provisions on behalf of the Natural Resources Defense Council, Inc. (NRDC).

We have previously expressed to you our serious concern with respect to the lack of basic inventory and resource data for the Shoshone-Eureka area. See our letter to you dated 7 January 1983 (copy enclosed). These and other significant problems were also detailed in the letter to you from Rose Strickland of the Sierra Club, dated 17 December 1982 (copy enclosed). Unfortunately, the Bureau has not remedied these shortcomings in the draft RMP/EIS, and the document is therefore fundamentally inadequate.

15-1 Given the Bureau's apparent failure to gather and analyze essential range and resource information, it is understandable that the agency has failed to prepare an adequate planning or analytical document. We are shocked that the BLM has even attempted to prepare an EIS without site-specific range condition and inventory data. (EIS, p. 3-8). The Bureau has long recognized the need for such baseline data to formulate management actions and to analyze adequately the consequences of such actions.

Similarly, the EIS fails to include site-specific estimates of current and future grazing capacity, which are necessary in order to remedy and prevent resource deterioration. Studies to determine wildlife habitat condition have not even been initiated (p. 3-2). Without such data, the environmental impact analysis in the EIS is necessarily unsupported and unsupportable. Thus, the Shoshone-

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15-1 Eureka EIS fails to comply with the minimum requirements of the National Environmental Policy Act (NEPA) and the judgment in NRDC v. Morton, 388 F. Supp. 829 (D.D.C. 1974).

15-2 Although the Bureau asserts that "existing range survey information is either old or incomplete" (p. 1-5), this information is never described or analyzed. In what ways are the data outdated? Are existing data satisfactory in any allotments? Can such data be used to substantiate the staff's professional judgment as expressed in the EIS, and if so, how? Likewise, the EIS refers to "existing range monitoring data" (p. 1-5) without describing or utilizing such data. Given the Bureau's refusal to implement stocking reductions until adequate monitoring data are available, it is essential for the agency to explain why existing data are not adequate for this purpose.

15-3 Not surprisingly, the proposals and alternatives in the RMP/EIS are extremely vague and generalized. The EIS includes proposed forage allocations* but lacks other specific proposals that are necessary if the document is to provide more than boiler plate guidance for future management. Grazing systems and treatments are described generally, but none are actually proposed or analyzed, even though the Bureau's impact analysis assumes implementation of appropriate systems and AMPs (e.g., pp. 4-5, 4-10). Similarly, the EIS lacks specific proposed "range improvements." The Bureau frankly concedes that "[d]ue to the lack of definition on the quantity, extent, and location of [proposed management] actions, specific analyses cannot be conducted" (p. 4-11). Thus, the EIS obviously fails to analyze "the actual environmental effects of particular [grazing] permits or groups of permits in specific areas," as required by NRDC v. Morton, 388 F. Supp. at 841.

15-4 The range of alternatives in the EIS is also deficient. First, the EIS fails to consider "a full range of management practices," as required by the "Final Grazing Management Policy," p. 1-18 (I.M. No. 82-292, March 5, 1982). As discussed above, the EIS fails

15-5 *Even these figures are extremely confusing. For example, how and why does "licensed use as a result of short term livestock actions" differ from "initial level of use" (p. 2-9, Table 2-2), and from "initial adjustment" (p. 2-16, Table 2-3)? I have analyzed numerous grazing EISs but had great difficulty understanding exactly how the Bureau is proposing to allocate forage in the area.

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Thank you for this opportunity to comment.

Sincerely,

David B. Edelson

Enclosures

Comment Letter 15

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January 7, 1983

H. James Fox, District Manager
Bureau of Land Management
District Office
P.O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

As you undoubtedly know, the Natural Resources Defense Council, Inc. (NRDC) has long sought to improve the BLM's planning for, and management of the Public Lands, including those located in Nevada. We believe better planning is essential to ensure proper management and protection of the resources of these lands, many of which are currently being degraded. In our view, the resource management planning process offers great promise for achieving these objectives — but only if it is implemented in accordance with applicable regulations and law, and only if based on adequate inventory information. Regrettably, based on the material you sent us describing the four proposed alternatives for the Shoshone-Eureka Resource Area Resource Management Plan (RMP) as well as reports from individuals who attended the open house sessions you scheduled, it appears to us that neither of these conditions are being met in connection with the preparation of that RMP. In particular, it appears that you lack sufficient inventory data and have yet to develop a reasonable range of properly selected alternatives. These and other concerns of ours are discussed succinctly in the comments of the Sierra Club, Toiyabe Chapter submitted to you recently by Rose Strickland. To save your time and ours, we adopt those comments as our own by this reference to them.

We hope you will consider our concerns seriously and thank you in advance for doing so.

Sincerely,

David B. Edelson Johanna N. Wald

JNW/DBE:klw

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15-4 to analyze any specific grazing systems, much less a broad array of such systems. The EIS refers to projected utilization levels (p. 2-34) but does not consider any alternative, lower levels. The EIS does include one alternative that would reduce existing seasons of use (p. 2-20), but this hardly constitutes a reasonable range of choices.

15-6 Second, the EIS lacks a "no grazing" alternative. As recognized in the enclosed memoranda from BLM managers, such an alternative must be considered to provide baseline information for comparison of other alternatives. Furthermore, no grazing is a viable option in areas that have been seriously degraded by over-grazing and in other sensitive areas. The Bureau's rationale for rejecting this alternative (p. 2-1) overemphasizes negative socio-economic impacts and ignores the needs of the resources. This focus is inappropriate for an agency charged with protecting and improving the public lands.

15-7 The environmental impact analysis is extremely generalized and conclusory. The Bureau baldly states that adverse impacts to water quality and soils will be "insignificant" (p. 4-1), even though livestock grazing can unquestionably result in serious water quality deterioration and soil erosion. The EIS must provide support for the Bureau's bare (and unlikely) conclusion that such impacts are not and will not be significant in the Shoshone-Eureka area.

15-8 Even worse, the potential adverse impacts of herbicide spraying are not even mentioned. The EIS states that spraying will be conducted in accordance with Bureau Manual 9222 and a Memorandum of Understanding with Nevada Department of Wildlife (p. 2-36), without describing or analyzing such procedures at all.* The EIS lacks any analysis of the potential risks to humans, wildlife, and the environment posed by herbicide spraying, including a "worst case analysis," as required by NEPA. See, e.g., SOCAT v. Watt, Civ. No. 79-1098 PR (D. Ore. Sept. 9, 1982). Such analysis should be included in the RMP, not in some later document, in order to provide comprehensive guidance for future activities.

15-9 We are perplexed by the EIS's implication that a 15% reduction in grazing and a 17% increase in grazing would both constitute a "significant benefit" (Table S-1). Certainly increased grazing is

*Please send us copies of these documents so that we may better assess the proposed actions.

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not a positive impact in an area that has concededly been over-utilized and degraded. This terminology must be clarified to focus on impacts to the resources of the public lands.

Given the serious resource problems that admittedly exist in the area, we strongly oppose the Bureau's "preferred alternative," which is essentially to defer necessary grazing reductions indefinitely. The EIS recognizes that resource deterioration is severe due to excessive and improper grazing, particularly year-long use (e.g., pp. 2-2, 2-6, 2-7, 3-11). Even so, the preferred alternative would apparently increase existing livestock numbers and retain existing seasons of use indefinitely (pp. 4-9 to 4-10). New stocking rates will not even be determined for two years (p. 2-34). Delay in implementing reductions is totally unjustifiable under the circumstances. The Bureau inexplicably proposes not only to defer such reductions, but also to implement significant increases in existing use.

We recognize that the Bureau has expanded the amount of aquatic and stream habitat to be protected since its 17 November 1982 proposal, and commend the Bureau for this proposal. However, in the absence of more specific and immediate proposals and analysis we are uncertain that the intended improvements will ever be realized.

15-10 Finally, given the magnitude of existing resource problems, it is difficult to imagine why 29 of 46 allotments should be categorized for "custodial" management. Moreover, given the Bureau's failure to describe resource problems and potential in specific areas or to apply the categorization criteria to particular allotments, it is impossible for the public to assess or comment on the categorization proposals. We are outraged that such information has been provided only to "livestock permittees" (p. A-1). This procedure violates the public participation requirements set forth in the "Final Grazing Management Policy," pp. 1-11 to 1-15.

In conclusion, the range and wildlife provisions of the Shoshone-Eureka RMP/EIS are fundamentally inadequate. They fail to comply with the basic requirements of NEPA and the judgment in NRDC v. Morton, and would undoubtedly be ruled inadequate by the court. The document should therefore be revised, supplemented, and circulated for additional public comment. See 40 C.F.R. § 1502.9(a) (1982).

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

PLEASE REPLY TO:

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December 17, 1982

James Fox, Manager
BLM/Battle Mountain District
P.O. Box 194
Battle Mountain, NV 89820

Dear Manager Fox,

Thank you for scheduling an afternoon session of the Shoshone-Eureka RMP open house in Reno. We appreciate the opportunity for obtaining direct information from your staff as well as commenting directly on the proposed plan elements.

We were disappointed in the November 17, 1982, mailing on the RMP alternatives, as it contained very little information. The open house helped supply some missing information, but again was inadequate as there was no written information on Shoshone-Eureka resources, conflicts, problems, or the relevancy of proposed alternative solutions. Exactly what information does the Battle Mountain District have on the resources, range capacity, wildlife habitat, recreation uses, etc.? We also disagree with the way the issues are determined (see previous correspondence), as there is no sense of what the real land management problems are, and which are more serious than others in the Resource Area.

Our chief problem with the proposed plan alternatives is the lack of any reliable information on the resources, their requirements, conflicts with other resources, and specific BLM proposals to improve public land management and resolve resource conflicts. It appears that resource decisions will have to be made on other than biological grounds. We fear that decisions made on political grounds will be seriously detrimental to public land resources, given the exploitative nature of this administration.

Other problems include the lack of a reasonable range of alternatives to be analyzed in the EIS. The alternatives are not meaningfully different, all merely variations on the theme, "do nothing and monitor." Alternative elements are mathematically determined and not based on resource requirements. For example, the total AUMs under the no action and the mid-range alternatives are the same, 385,000. The mid-range alternative does not include reasonable numbers of wildlife. What is the 166,000 AUMs for livestock in the protection alternative based upon? Is the number a tacit admittance that there is livestock overgrazing in the Shoshone-Eureka RA? Why is an increased level of wild horses considered "resource protection"? What is the 56,000 AUM amount for wild horses based on?

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Comment Letter 15

The wilderness recommendations should have at least two more alternatives, one between the 95,198 mid range and the 149,168 protection alternatives, and one with the Diamond NSA added back in. The land tenure adustment alternatives are totally ridiculous. Who is supporting 313,000 acres to be disposed? What documentation in the RMP planning process can you produce which shows any public backing for the disposal of huge acreages in the Resource Area? Is this not a BLM political directive, not one generated through the planning process? Likewise, 18 utility corridors proposed in the production alternative is ridiculous, given any reasonable analysis of future demand. This number should be scaled down. The woodland products alternatives were confusing with apparently less acreage available in the production alternative than in the mid-range alternative.

Of great concern to us is the miniscule amount of proposed improvement for riparian and stream habitat. The acreages proposed for improvement should be greatly increased. In addition, funding for riparian and stream habitat improvement should come from sources other than the wildlife program budget. The problems were caused by misuse by livestock and wildhorses as well as, possibly, mining. The funds for restoring these valuable habitat areas should come from the public land users causing the damage.

All in all, the proposed Shoshone-Eureka RMP alternatives are very disappointing. The whole process appears to be a political one, totally divorced of any biological understanding of our natural resources and their requirements. If there are not substantial changes in the RMP, we predict the final plan will be useless, both as a guide to BLM decision makers and a waste of the public's time, not to mention public funds. Also, tragically, the RMP is a waste of the professional skills of BLM resource management staff, and a reflection on the pecuniary motivation of the present administration, no matter what the cost to our invaluable public land resources.

Thank you for considering our comments.

Sincerely,

Rose Strickland, Chair
Public Lands Committee

Sierra Pacific Power Company

September 20, 1983

H. James Fox, Manager
Battle Mountain District
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

RE: Draft Shoshone - Eureka Resource Management Plan and Environmental Impact Statement

Dear Mr. Fox:

Thank you for the opportunity to comment on the Draft Shoshone - Eureka RMP and EIS. BLM Battle Mountain District, Shoshone - Eureka Resource Area is to be congratulated for its multiple use planning efforts. The identification of the corridor issue and subsequent designation of corridors in this Draft RMP are in keeping with the intent of the Federal Land Policy and Management Act of 1976 (FLPMA).

Sierra Pacific Power Company supports the "Preferred Alternative" subject to the clarification and resolution of areas of major concern outlined in this letter.

The following are areas of major concern that Sierra Pacific feels need to be clarified and resolved:

16-1

1. a) Draft RMP/EIS Quote:

Chapter 2 - Alternatives - Preferred Alternative - UTILITY CORRIDORS - Management Actions - page 2-11

1) "Designate 112 miles of utility corridors which include existing transmission lines (A-C), and identify 167 miles of planning corridors (D-G), as shown on Map 2-1;"

b) Problem:

Sierra Pacific finds the use of corridor segments in parenthesis confusing.

c) Solution:

Sierra Pacific recommends the following language:

1) "Designate 112 miles of utility corridors which include existing transmission lines and identify 167 miles of planning corridors, as outlined below and shown on Map 2-1;"

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2. a) Draft RMP/EIS Quote:

Chapter 2 - Alternatives - Preferred Alternative - UTILITY CORRIDORS - Management Actions - page 2-11.

1) "L-R-J-T-P or L-R-J-M-T-P, a corridor including the existing 230 kV powerline right-of-way. From point M west to K, excluding lands administered by the Toiyabe National Forest, the existing powerline right-of-way would be the southern boundary of the corridor, the corridor would not include a concentration of sage grouse strutting grounds in Township 20 North, Range 51 East and would not include Devil's Gate;"

b) Problem:

16-2

Sierra Pacific has several problems with the above-referenced section of the Management Action. First, the corridor is hard to follow using the point-to-point letter designation given, particularly around Nickison Summit area. Second, the statement "from point M west to K the existing power line right-of-way would be the southern boundary of the corridor" is unacceptable to Sierra Pacific. Please refer to Sierra Pacific's letter of August 31, 1983 to Mont Lewis, Austin District Ranger, Toiyabe National Forest (attached), which outlines a 3/4 mile corridor south of the existing 230 kV transmission line. For the consistency of corridors between federal agencies, we request that BLM adopt the 3/4 mile corridor south of the existing 230 kV transmission line. It would be appropriate at this time to point out that designation of a corridor is not a "taking of the land," but, in fact, a land use planning tool. Third, the exclusion of a corridor because of sage grouse strutting grounds is inappropriate in the land use plan. We do not believe sage grouse strutting grounds are an exclusionary issue. Any possible adverse impacts to the sage grouse strutting grounds should be addressed as a mitigation measure for a specific project. Sierra Pacific recommends the deletion of the sage grouse issue in this section. Fourth, the exclusion of the Devil's Gate area from utility corridor designation is not acceptable to Sierra Pacific. The area encompassed by the term "Devil's Gate" is undefined. Is it five miles each side of the highway or the highway right-of-way? Further, on page 3-11 BLM states that

Comment Letter 16

the Devil's Gate area may have visible management activity, but must not attract attention as a contrast to the landscape. We interpret this as being non-exclusionary. We further question the VRM classification of Class II for the Devil's Gate area in lieu of the existing 230 kV transmission line.

c) Solution:

16-2

Sierra Pacific recommends the following:

1) Change item b) as follows:

"B) Corridor L-K-J-G-North-M-T-P or L-K-J-G-South-M-T-P including an existing 230 kV power line right-of-way. From G west to K, excluding lands administered by the Toiyabe National Forest, the corridor would be 3/4 miles south of the existing 230 kV transmission line."

2) A meeting to be held at the earliest convenience between BLM Battle Mountain and Sierra Pacific for the purpose of field review and discussion of concerns on the Devil's Gate and Nickison Summit areas.

3) a) Draft RMP/EIS Quote:

16-3

"D) C-R-K, a corridor for future utilities between Battle Mountain and Austin through Reese River Valley. The corridor would remain on the east side of State Highway 305, and avoid the visual resource management class II area in the lower Shoshone Mountains (Ravenswood) by remaining at least one mile east of the road;"

b) Problem:

Sierra Pacific's concern is similar to that expressed in item 2. The avoidance of the Ravenswood portion of the Shoshone Range Class II area is undefined. It is not easy to assess the impacts on the remaining corridor designation in the area.

c) Solution:

Sierra Pacific recommends the following:

1) A meeting be held at the earliest convenience between BLM Battle Mountain and Sierra Pacific for the purpose of field review and discussion of concerns in the Ravenswood area.

4. a) Draft RMP/EIS Quote:

Chapter 2 - Alternatives - Implementation - UTILITY CORRIDORS - page 2-31.

"Utility corridors which include existing transmission lines will be designated....Applicants for use of a corridor will be required to locate new facilities proximate to existing facilities except where considerations of construction feasibility, cost, resource protection or safety are overriding."

16-4

b) Problem:

Sierra Pacific feels that compatibility and reliability should be included when exempting the location of new facilities proximate to existing facilities. Example: Natural Gas pipelines are not necessarily compatible with electric transmission lines because of possible electric induction in the pipeline. Reliability deals with electric system designs, outages caused by natural occurrences (i.e. fire, earthquakes, slides, etc.), and man-caused occurences (i.e. airplane accidents, etc.).

c) Solution:

Sierra Pacific recommends the following language change:

Utility corridors which include existing transmission lines will be designated.... Applicants for use of a corridor will be required to locate new facilities proximate to existing facilities except where considerations of construction feasibility, cost, compatibility, reliability, resource protection or safety are overriding.

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5. a) Draft RMP/EIS Quote:

GLOSSARY-page GL-1: "CORRIDOR: A passageway through which all utility transmission (powerlines, gas pilines, etc.) and transporation (roads, railroads) facilities, both existing and proposed, are located."

16-5

b) Problem:

Sierra Pacific finds this definition to be misleading and not consistent with the definitions or their intent as found in 43 CFR 3000. The use of "All" in this definition leads one to believe that there are no utility and transportation facilities outside of a "Corridor."

Due to topographic constraints, compatibility, etc. not all transportation and utility facilities will be in the same corridor. Also, we find that a definition of a "designated corridor" needs to be included in the Glossary.

c) Solution:

Sierra Pacific recommends the following changes and additions to be made to the Glossary.

1) Change definition as follows:

"Corridor: A passageway through which any combination of similar, identical, or compatible utility transmission (powerlines, gas pipelines, etc.) and transportation (roads, railroads) facilities, both existing and proposed are located."

2) Add definitions as follows:

i) "Designated Corridor: A three-mile (3) wide passage on which existing transportation and utility facilities are located and are suitable to accommodate future transportation and utility facilities which are similar, identical, or compatible."

ii) "Planning Corridor: A passage on which no existing transportation utility facilities exist but for which a future need has been identified."

Comment Letter 16

6. a) Draft RMP/EIS Quote:

GLOSSARY - page GL-6

"Utility corridor: A corridor through an area, in which all utility transmission facilities, both existing and proposed, are located. Concentration of use results in less area disturbed and a minimum of environmental damage."

16-5

b) Problem: Same as item 5.

c) Solution: Sierra Pacific recommends the following change:

Utility Corridor: A parcel of land, without fixed limits or boundaries, that is being used as the location of one or more utility rights-of way.

7. a) Draft RMP/EIS Quote: None. See Map 2-1 (attached).

b) Problem: Sierra Pacific has attached a copy of Map 2-1 which shows the problems expressed in item 2 of this letter. Also in the legend we see a need to clarify planning corridor description.

16-6

c) Solution: Sierra Pacific recommends the following changes:

1) See attached Map 2-1 for changes in the point-to-point letter designation.

2) Legend should read:

---Planning corridor for future utilities. Location of utility corridor determined upon grant of first right-of-way.

Comment Letter 16

We look forward to meeting with you in the very near future to discuss our comments and concerns. Also we hope that our comments and concerns will be addressed in the Final Shoshone-Eureka RMP.

Sincerely,

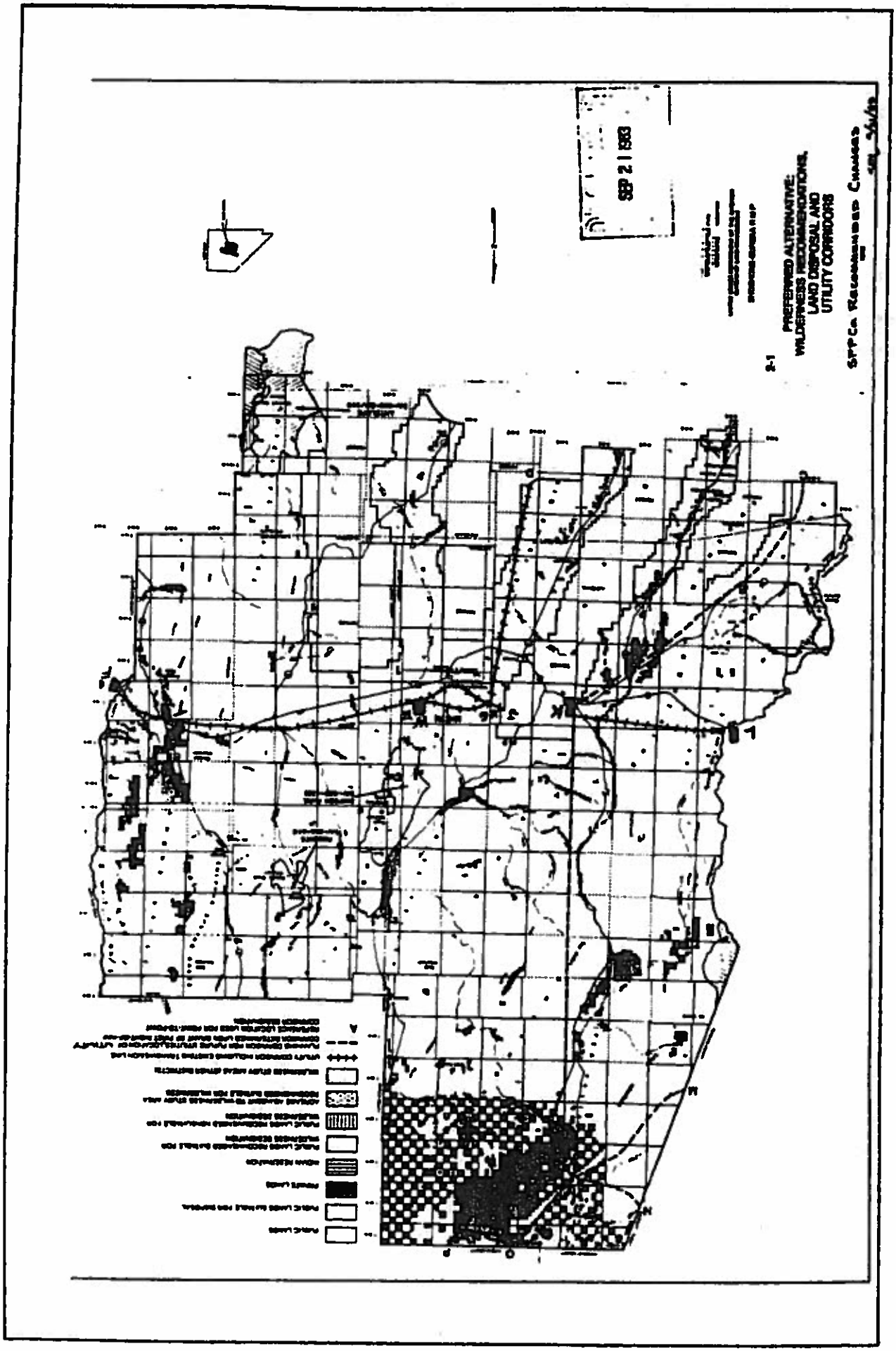
Michael P. Sullivan
Manager, Environmental Affairs
& Right-of-Way Acquisition

NPS/SPY/md
SAR10/60-65

Attachment

cc: Ed Spang - BLM, Nevada State Director, Reno
Stu Gearhart - BLM, Reno

Comment Letter 16



GOLD FIELDS MINING CORPORATION
A Consolidated Gold Fields Group Company

Please reply to the address indicated.
[illegible] Union Boulevard—Suite [illegible]
Lakewood, Colorado [illegible]
Telephone ([illegible]) [illegible]/Telex [illegible]

Telecopier ([illegible]) [illegible]

☐ 230 Park Avenue
New York, New York [illegible]
Telephone (212) [illegible]/Telex [illegible]

Telecopier (212) [illegible]

September 19, 1983

Mr. H. James Fox, District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT AND RESOURCE MANAGEMENT PLAN - SHOSHONE/EUREKA RESOURCE AREA, NEVADA

Dear Mr. Fox:

In reading and evaluating the various alternatives being considered for the resource management plan for the Shoshone-Eureka Resource Area, I find that neither the planning issues nor the alternatives properly consider oil and gas exploration or mineral entry and development. This is probably due to a failure of the energy and minerals industries to make timely comments rather than the issues being ignored by the Bureau of Land Management.

As you know, several major gold-copper mines are operating in the Battle Mountain area. These deposits occur in a geologic setting that is found throughout the Shoshone-Eureka Resource Area. This favorable geologic setting has drawn several major mining companies, including Gold Fields Mining Corporation, into the Resource Area. To the best of my knowledge, the various companies involved in exploration programs are conducting themselves in a highly professional and efficient manner, which includes operating within the framework of current Bureau of Land Management regulations. Most of the exploration activity in progress will never get to the drilling stage, but will involve geologic mapping sampling and various remote sensing techniques, all of which create a minimal impact on the environment.

The chances of finding additional major mineral deposits in this Resource Area are rated excellent by the minerals industry, and are rated "high" in a recently completed G-E-M

Comment Letter 17

Mr. H. James Fox
September 19, 1983
Page Two

17-1 study. Any significant changes in resource management may adversely affect the development of the mineral potential of this Resource Area. Therefore, I feel it is extremely important that the issues of mineral entry and exploration be given proper consideration in formulating the final Resource Management plan for the Shoshone-Eureka Resource Area.

From the standpoint of desirability to the mining and exploration industry I would rate the four alternatives as follows (from most to least desirable):

1. No Action Alternative
2. The Economic Development Alternative
3. The Preferred Resource Management Plan
4. The Resource Protection Alternative

I realize the "No Action Alternative" does not really adhere to the directive stated in Section 202 of the Federal Land Policy and Management Act of 1976. However, the other three alternatives do not appear to properly address the question of mineral entry (as stated in Regulation 43 CFR Part 3809.0-2), nor do they discuss the Department of Interior's statement of policy encouraging development of mineral resources (Regulations 43 CFR Part 3809.06).

Thank you for your consideration of these comments.

Sincerely,

Rick H. Russell
Exploration Manager
Rocky Mountain/Southwest Region

RHR/amo

cc: John Wells, MEC

Comment Letter 18

SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO: ☐ _____ ☐ GREAT BASIN GROUP P.O. Box 8096 University Station Reno, Nevada 89507 ☐ LAS VEGAS GROUP P.O. Box 19777 Las Vegas, Nevada 89119

September 18, 1983

H. James Fox, Manager
BLM/Battle Mountain District
PO Box 196
Battle Mountain, NV 89820

Dear Manager Fox,

I am commenting of the draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement for the Nevada Outdoor Recreation Association and the Public Lands Committee of the Toiyabe Chapter of the Sierra Club. NORA has been actively involved in public land management, especially protection of wilderness and other outstanding natural areas in Nevada and in the Battle Mountain District, for decades. The Toiyabe Chapter has nearly 2,000 members in Nevada and Eastern California who are vitally concerned with the management of the public lands in the Shoshone-Eureka RA.

I am extremely disappointed after reviewing the documents, as the draft RMP fails as a planning guide and the DEIS is equally inadequate. I have reviewed all of BLM's land use plans in Nevada produced over the last few years, and the Shoshone-Eureka ranks as one of the worst.

My comments will not be comprehensive as there is very little to actually review. Basically, the alternatives proposed do not offer any meaningful short or long term solutions to the primary resource management problem in the Shoshone-Eureka area - overgrazing. Historic overgrazing has left the RA in over 70% less than good ecological condition (Table 3-3), although our members would consider this estimate an understatement of the problem. Yet the preferred alternative, if implemented, would only result in an estimated 9% improvement in range condition, leaving at least 61% in unsatisfactory condition. Current overgrazing would not be controlled for several years until monitoring provides "enough" data on which to base livestock reductions. Even the resource protection alternative would result in only an estimated 19% improvement, leaving over 50% of the 4,388,000 acres in less than good condition. Current grazing levels would not only continue, but be increased by 3% in the short term and 11% in the long term. Increases in livestock numbers do not seem to be an appropriate response to the serious problem of overgrazing and range deterioration.

The causes of the problems in the Shoshone-Eureka RA are evident in an examination of Table 2-1. 25 out of 46 allotments have

year long grazing, while 9 others have early spring grazing before May 1st. It is usually recognized by range management professionals that uncontrolled and early grazing are the primary causes of deteriorated native rangelands. Only 7 allotments have Allotment Management Plans and 4 of these provide for year long grazing. How effective are these AMPs, especially since 4 of the 7 are in the I category? Only 5 new AMPs are proposed in the preferred and the resource protection alternatives. Has BLM abandoned AMPs as the main tool for improving range management, or has the Battle Mountain District abandoned the goal of improving range management?

18-1

The "selective categorization" is a thoroughly undocumented and useless procedure. With 70% of the Shoshone-Eureka RA in less than good condition, BLM found only 18 (I) allotments it intends to improve, while 29 (C) are written off as un-improveable. This is an incredibly inadequate response to the massive resource management problems in the RA.

18-2

I have specific comments on several proposed management actions. Many actions proposed to benefit wildlife habitat are good, but without a concomitant improvement in ecological range conditions will do little to significantly benefit wildlife in the short run or the long run. The protection of riparian areas is good, but not enough. The wilderness proposals in the resource protection alternative are good, but not enough. At a cost of $1,295,000 for a 3% increase in AUMs, range improvements proposed in the preferred alternative would take 127 years to be amortized at the current grazing fee. $179/AUM is too high a cost for "range improvements." No justification is given for the disposal of public lands. And recreation resources are very inadequately planned for.

No explanation is given for the omission of recommendations for ACECs. Both the Sierra Club and NORA find it extremely difficult to believe that in 4.3 million acres, there is not one area of critical environmental concern identified by the BLM. Charles Watson of NORA has been advising the Battle Mountain District for decades of areas of exceptional scenic, biological, paleontological, geological, and scientific value in the Shoshone RA. Such an omission reflects poorly on the knowledge of the outstanding resources of the Shoshone-Eureka RA by its managers.

18-3

While necessary grazing reductions are contingent on "monitoring" data, the RMP is very vague on the level and intensity of the monitoring program. If monitoring in 36 allotments (M&I) will be of "low intensity", how will BLM be able to determine if an allotment should be moved to a different category?

18-4

The DEIS in inadequate in its range of alternatives. A no grazing alternative was dismissed as impractical in Chapter 1, yet two more recent DEISs, the Egan and the Honey Lake-Beckwourth, both contain no grazing alternatives. How is the analysis of a no grazing alternative more impractical in the Shoshone-Eureka RA than in the Egan and the Honey Lake-

18-5

Beckwourth RAs?

In summary, the DEIS/DRMP is inadequate in several areas:
1. Its proposals to solve serious resource management problems and guide public land management both in the short term and in the long term
2. Its environmental analysis of the proposed alternatives
3. Its range of alternatives

The document should be revised to present a full range of alternatives, including a no grazing alternatives. The alternatives should propose the following:
1. No disposal of the public lands, except on a case-by-case basis.
2. Tree cutting should be restricted to areas with little important wildlife or other resource values.
3. Riparian habitat improvement goals should be at least half of the total acres and aquatic habitat goals should be at least half of the total miles of streams. Wildlife habitat should be improved so that populations can reach reasonable numbers, at least in the long run.
4. Wild horse numbers should be reduced to the carrying capacity of the range, but at the same rate as livestock reductions in the same areas.
5. Livestock numbers or seasons-of-use should be reduced or changed or grazing systems implemented to adjust to the carrying capacity of the range in the short term as well as in the long term. AMPs should be developed or revised for every I category allotment. At least 75% of the allotments should be put in the I category and removed from the C category, especially those with high wildlife and other resource values.
6. Vegetation ecological condition goals should be increased to at least 50% in good condition in the RA. Trends should be improving or stable in all allotments. Any allotment with an overall decreasing trend should receive top priority for BLM funds and attention.
7. Cultural resource sites should receive protection with those most threatened receiving priority consideration.
8. All WSAs should be recommended as wilderness. In the case of the Simpson Park WSA, the boundaries should be adjusted to eliminate any demonstrably unmanageable areas.
9. We support the resource protection alternative in closing 49 ways. Recreation resources must receive more BLM attention. As the BLM recreation budget is currently limited, more use of volunteers should be incorporated in recreation plans.
10. Mineral exploration and development should be permitted so as not to negatively impact other resources.
11. Utility corridors should be limited to existing routes.

It was very discouraging for me to review this DEIS as it is clearly worse than the other recent Nevada EISs, repeating old problems and adding a few new ones. Its proposed management actions are even weaker and more inappropriate than those proposed in the other DEISs. I'm afraid the Shoshone-Eureka RMP reflects a weakening commitment by BLM to the improvement of

the ecological condition of the public lands. I request that the DEIS be revised to include a no grazing alternative and that the selected alternative include as many as possible of the recommendations I have made above.

I trust that the explanation for the unsatisfactory document does not rest in the "input" received by the Battle Mountain District from a range consultant on resource problems and proposed actions (letter of 8/15/83).

Thank you for considering our concerns.

Sincerely,

Rose Strickland

Rose Strickland, Chair
Public Lands Committee
(702) 747-4237

Comment Letter 19

STATE OF NEVADA
STATE OFFICE OF COMMUNITY SERVICES
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710

September 21, 1983

Mr. H. James Fox, District Manager
Battle Mountain District
Bureau of Land Management
P. O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

Attached are the comments from the State of Nevada on the Draft Shoshone-Eureka RMP/EIS. Commenting agencies include the Department of Conservation and Natural Resources (Divisions of Environmental Protection, Historic Preservation, State Lands, State Parks, Water Planning), the Departments of Agriculture, Minerals, and Wildlife; and the Bureau of Mines UNR, Reno.

These comments constitute the State Clearinghouse review of the proposed plan. Please incorporate these comments in your final decision.

It should also be noted that the State has developed a consensus position on wilderness designation within the Shoshone-Eureka management area. The Governor will advise you of the State's position in a separate letter.

Sincerely,

John B. Walker FOR

Linda A. Ryan
Director

LAR:JBW/mg
cc: Ed Spang, Nevada State Director, BLM
Enclosure

Comment Letter 19

FEDERAL IMPACT
REVIEW PROGRAM

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

RECEIVED
JUN 21 1983
ENVIRONMENTAL PROTECTION

Conservation and Natural Resources

X State Lands
X Conservation Districts
[redacted]
X Forestry
X Hist. Preservation & Archeology
X State Parks
X Water Planning
— Water Resources
— Mineral Resources

XX Wildlife

83300097

IMPACT: Draft Shoshone-Eureka Resource Management Plan and EIS

[redacted]

Write out your comments if applicable. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT.

X Conference desired (see below)
— Conditional support (outline below)
— Disapproval/denial of funding (must specify reasons below)

AIR-Dick Serdoz: No comment.

WATER-Ralph Capurro: The need for a wastewater discharge permit for this office is not addressed in this report. Any mining or other potential sources (such as a geothermal development) with a surface or groundwater discharge would need to contact this office for a determination on whether a permit would be required.

SOLID WASTE-Verne Rosse: No comment.

L. H. Dodgion/Kgw — Administrator — 885-4670 — 7/21/83
Phone — Date

Comment Letter 19

RICHARD H. BRYAN
Governor

STATE OF NEVADA

ROLAND D. WESTERGARD
State Historic Preservation Officer

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

September 15, 1983

MEMORANDUM

TO: John Walker, Office of Community Services

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

SUBJECT: DRAFT SHOSHONE-EUREKA RESOURCE MANAGEMENT PLAN AND EIS
(SAI NV#83300097)

The Division has reviewed the draft Shoshone-Eureka Resource Management Plan and EIS. We have the following comments regarding specific items in the document.

Concerning the proposed Wilderness Study Areas, the Division supports the preferred alternative for the Antelope Wilderness Study Area. The James Wild Horse Trap, a National Register property, and a number of Shoshone wickiups, would be better protected as a wilderness study area than a multiple-use designated area.

The Division concurs with the actions to be taken to protect significant cultural resources as described in the Standard Operating Procedures. If the preferred alternative is selected, project areas and areas proposed for disposal will be inventoried for archeological and historical resources. Reports resulting from such activities will be forwarded to this office for review and comment. The Bureau, by law, must consult with this office regarding determinations of eligibility and proposals that might potentially affect properties of National Register quality.

We are also aware that whatever action is taken, some cultural resources are being damaged continually by wild horse trampling, cattle grazing and vandalism and illegal collecting activities. We recommend that the BLM consider focusing on a plan to mitigate damages caused by these activities and to protect sites from particularly destructive actions such as vandalism and pothunting.

We appreciate the opportunity to comment on this plan. If you have any questions regarding our comments, please call us.

ANB/lmr

Comment Letter 19

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
Division of State Lands

September 20, 1983

RECEIVED ON
SEP 20 1983
OFFICE OF COMMUNITY SERVICES

MEMORANDUM

TO: John Walker, Clearinghouse, Office of Community Services

FROM: Pamela B. Wilcox, Administrator

SUBJECT: Shoshone-Eureka Resource Management Plan and Environmental Impact Statement, SAI NV #83300097

The Division of State Lands appreciates the opportunity to review and comment on the proposed Shoshone-Eureka RMP and EIS. The Division has statewide responsibilities for the review and evaluation of land use policies and activities for lands in Nevada which are under federal management. This RMP and EIS were reviewed with these responsibilities in mind.

Generally, we support the preferred resource management plan as a mid-range, balanced alternative. There should, however, be some clarifications or modifications.

19-1 On page 1-2 the statement is made that "No areas of critical environmental concern have been identified within the Shoshone-Eureka Resource Area." It is not clear what attempts have been made to identify areas of critical environmental concern. There are several areas that might benefit from the specialized planning that ACEC designation would provide. To our knowledge, these include sensitive wildlife areas such as Moss Creek Canyon, critical raptor nesting area (Township 21 North, Range 47 East), critical springfish habitat (Township 16 North, Range 53 East), and others identified by the Department of Wildlife; sensitive cultural features including the National Register James Wild Horse Trap and Hickison Petroglyph Site; and sensitive geologic or natural areas such as the Mountain Meadow Natural Area, Diana's Punchbowl, Spencer Hot Springs and Roberts Creek Mountain. Have these been considered? If so, the EIS should discuss it.

19-2 Issue Number 2, dealing with Land Tenure Adjustments, speaks of adjustments dealing with community expansion, agricultural needs, and recreation and public purposes. It does not address the checkerboard land distribution problem. Manageability of lands should be a criterion for consideration of disposal.

A discussion on what criteria were used to determine which lands within the checkerboard area should be retained or disposed of would be helpful to the reader. It is impossible to determine why certain lands were proposed for disposal and why other lands were not considered, especially in the checkerboard area.

M E M O R A N D U M
John Walker, Clearinghouse
September 20, 1983
Page 2

19-3 Issue Number 5, dealing with livestock use, seems to indicate that stocking levels would be at the discretion of the rancher. If Cooperative Management Agreements of up to ten years in length are being proposed (page 2-36) then this should be plainly stated and evaluated. Grazing levels should be set with the rancher's cooperation, but should not exceed the livestock grazing capacity. The allocation of the grazing resources should be balanced between wildlife, livestock and wild horses.

19-4 We note that the EIS proposes to maintain wild horses in the areas where wild horses existed in 1971, yet maintain populations at 1982 levels. There has been a substantial increase in wild horse populations between 1971 and 1982, with some areas experiencing severe range use problems due to excess wild horse populations. If 1971 wild horse use areas are to be used as a standard, should not 1971 population levels which existed within these areas also be used, instead of 1982 populations levels? If the year-long grazing use of the rangeland by livestock is considered a "major concern", should not the year-long use by wild horses also be of equal concern?

19-5 It is not clear how many miles and acres of utility corridors will actually be required to meet anticipated needs. If the needs can be satisfactorily met with 112 miles of corridors (page 2-16, resource protection alternative) are the 391 miles proposed in the economic development alternative extravagant? A minimum or some standard should be identified that meets the utility corridor need. The discussion of objectives under utility corridors in the economic development alternative is no different from the discussion in other alternatives and shows no correlation between additional miles of corridor (3.5 times the resource protection alternative) and economic development. The needs and/or advantages for the increased miles of corridors should be presented as well as a discussion on the adverse impacts, if any, that could result from either overly limited or overly generous corridor designation.

Standard Operating Procedure Number 29 (page 2-37) states that no sites determined to be eligible in the National Register of Historic Places will be transferred to other ownership. This assumes that BLM is the best or most appropriate managing agency for these resources. Other public, semi-public or even private agencies or groups, such as the State Museum, Division of State Parks, a historical society or other such group may be an appropriate manager.

Our comments on wilderness are included in the Governor's consolidated wilderness statement. The Governor's recommendation is that the Antelope Wilderness Study Area be considered for designation as wilderness and that Simpson Park and Roberts be dropped. The Roberts Range is an area of outstanding natural values in geology, fossils and botany and requires some special attention. It should be established as an area for study by students and interpretation for the general public.

PBW:JHM:js

Comment Letter 19

FEDERAL IMPACT
REVIEW PROGRAM

OFFICES OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

[illegible]

Conservation and Natural Resources

X State Lands
X Conservation Districts
X Environmental Protection
X Forestry
X Hist. Preservation & Archeology
[redacted]
X Water Planning
__ Water Resources
__ Mineral Resources

XX Wildlife

[illegible] 83300097 PROJECT: Draft Shoshone-Eureka Resource Management Plan and EIS

[illegible] of the above-mentioned project. Please evaluate it with respect to:

[redacted]

[illegible] [redacted]. Write out your comments if applicable. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT [illegible]

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

__ No comment on this project
__ [illegible]
__ [illegible]
X Conference desired (see below)
__ Conditional support (outline below)
__ Disapproval/denial of funding (must specify reason below)

[illegible] (use additional sheets if necessary)

Based on the selected alternatives, I feel the preferred alternative is the best method to meet the needs of multiple use management.

The Division does not have any sites within the resource area, nor are there any potential state parks that I am aware of at this time. The recreation preference is dispersed recreation rather than site specific. This tends to eliminate structural facilities or state park facilities and development concepts.

If potential state parks are in the area, I still feel that the preferred alternative would still be the best at this time.

RECEIVED

John Richardson, Administrator

Signature ___ Title ___ Phone ___ Date ___

Comment Letter 19

NEVADA DIVISION OF WATER PLANNING

SEP 1983

STATE OF NEVADA

ADDRESS REPLY TO

DIVISION OF WATER PLANNING
201 S. FALL STREET NYE BLDG.
CAPITOL COMPLEX
CARSON CITY NEVADA 89710

TELEPHONE (702) 885-4380

MEMORANDUM

September 12, 1983

TO: Office Of Community Services - Federal Impact Review Program

FROM: Robert E. Walstrom, Hydraulic Engineer III

SUBJECT: SAI NV # 83300097, Draft Shoshone-Eureka Resource Management Plan and EIS (BLM)

19-6 The Division has reviewed this document and wish to make the following comment: On page 2-8, 2-31 and 4-2 of the report it delineates 106,959 acres of public lands for disposal under Land Tenure Adjustments. The report does not state how the land is to be disposed of. It is suggested that when disposal of public lands is considered trading of these lands should be a prime alternative. In this manner the "blocking up" of public lands could be facilited with a minimum reduction in overall acreage. This would be especially workable with agricultural land where private lands in low valleys could be be increased by trading for blocks of lands in the higher mountain ranges.

A DIVISION OF THE DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Comment Letter 19

FEDERAL IMPACT REVIEW PROGRAM

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

[redacted]

Conservation and Natural Resources
X State Lands
X Conservation Districts
X Environmental Protection
X Forestry
X Hist. Preservation & Archeology
X State Parks
X Water Planning
Water Resources
Mineral Resources

XX Wildlife

SAI NV 83300097

PROJECT: Draft Shoshone-Eureka Resource Management Plan and EIS

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [redacted]. Write out your comments if applicable. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

XX Conference desired (see below)
Conditional support (outlined below)
Disapproval/denial of funding (must specify reason below)

Land Ownership
We support the economic development alternative to transfer to private ownership 85,940 acres.

Wild Horses
Should be managed at 1971 numbers and in areas they were known to occur when the Wild Horse & Burro Act became law.

Livestock Grazing
The economic development alternative of 303,280 AUM's is a significant impact. If the agricultural industry is going to provide the people of this country with a reasonably priced source of meat, this alternative is needed.

SEE ATTACHED PAGE FOR ADDITIONAL COMMENTS

Regional Coordinator — Title
Phone
9/9/83 — Date

Comment Letter 19

Vegetation
The economic development alternative would provide for better range conditions in the long term. Range improvement funds would be used to implement the programs proposed in this alternative.

Wilderness
Antelope WSA - Recommend that this area be considered as an WSA since it does not constitute any problems for the agricultural industry.

Roberts
This area has a high mineral potential and many significant man-made imprints, therefore, it should not be considered for a WSA

Simpson Park
This area has many human imprints, 11 ways, four water developments, and a crested wheat seeding. The mineral potential is very high and exploration would likely occur if the WSA designation was removed. We recommend that this area not be considered as a WSA.

Comment Letter 19

RICHARD H. BRYAN
Governor

STATE OF NEVADA

DEPARTMENT OF MINERALS
400 W. King Street, Suite 106
Carson City, Nevada 89710
(702) 885-4060

September 9, 1983

Mr. John Walker
State Clearinghouse Coordinator
State Office of Community Services
Capitol Complex
Carson City, Nevada 89710

Dear Mr. Walker:

With this letter we are sending our comments on the Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement (SAI NV#831000977). We appreciate the opportunity to comment on this most important document.

The Nevada Department of Minerals has several concerns relating to the Draft Environmental Impact Statement. Of primary concern is the proposal to close several sections of land in which there currently is or has been mining or exploration activity. These same sections of lands have a high favorability for mineral accumulations. We believe that an area's true mineral potential can never be fully known until actual mining and exploration occurs. In many cases major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seems to have little or no minerals potential into a prime exploration target. From our viewpoint, Wilderness Study Areas should only be considered if an area has no mineral resource potential, that is, areas with sufficient geologic data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

Furthermore, the Department feels that if any area with favorable mineral potential is to be recommended for wilderness, it should only be because: 1) there are no alternate sites with no mineral potential; 2) no other example of dominant ecosystem type is suitable for wilderness and located within a day's drive of the same population area; and 3) an intensive U.S. Geologic Survey or U.S. Bureau of Mines study has been conducted at a sufficient level of detail to reclassify the area as having no resource potential.

The Nevada Department of Minerals has the following specific recommendations for each Wilderness Study Area being considered in the Shoshone-Eureka Resource Area.

ROBERTS WILDERNESS STUDY AREA (NV-060-541)

The entire Wilderness Study Area has high or moderate favorability for mineral accumulations and carries a Geology, Energy, and Minerals Study (G.E.M.) rating of either 3 or 4 in relation to occurances of both metallic and non-metallic minerals. Therefore, the Department of Minerals supports the Economic Development Alternative for the Roberts Wilderness Study Area.

There is currently, and has been in the past, extensive mining activity in and around the Roberts WSA. Of extreme importance is the fact that many of the gold ore properties currently being exploited in this state are found in structural settings similar to those exposed at many locations in the Roberts WSA. The mining industry is very interested in the Roberts Area due to occurances of precious metals, barite, and and base metals (Zn, Pb, Mo).

The Roberts Mountain formation, the host rock at both Carlin and Cortez Gold Mines is present in the Roberts WSA. Rocks that host many barite occurances in nearby Lander County are also present in the WSA. Barite is currently being produced at the Big Scoop Mine on the eastern edge of the WSA*

There are numerous mining claims in T.24N., R.50E., Sections 26, 33, 34; and in T.23N., R.50E., Sections 15, 16, 17, 21, 23, 24, 25, 26, 28, and 29, which illustrates the tremendous interest by the mining industry in this specific area of the state.

The July Mine (T.23N., R.50E., Section 3) originally located in 1902 by Peter Carletti produced some 400 tons of ore through 1937. The operator produced not only the base metals of zinc and lead, but also silver.

A recently announced gold discovery at Tonkin Springs, a few miles to the west, will draw considerate attention to the Roberts WSA. The new discovery is reported to be within certain favorable rocks of the Vinini formation. Since this formation also crops out within the WSA, the potential for mineral discovery could be high.

* According to a survey conducted by the Nevada Bureau of Mines and Geology in 1910.

Comment Letter 19

The Mount Hope project proposed by Exxon Corporation, which could become the largest mining operation in Nevada, will be located just a few miles east of the Roberts WSA. The project will definitely cause an economic boom in the area, with the possibility of some 5,000 jobs and the establishment of a new mining community.

Both the Roberts WSA and the Mount Hope project are located within the Battle Mountain-Eureka Mineral Belt. This mineral belt, which has a northwest trending structure, has been of extreme interest to the mineral industry for many years due to both proven and potential mineral accumulation.

The Nevada Department of Minerals strongly opposes any of the Roberts Wilderness Study Area being considered as wilderness and feels that wilderness designation would have a significant adverse impact on mineral and energy developments in the state.

SIMPSON PARK WILDERNESS STUDY AREA (NV-060-428)

The Nevada Department of Minerals supports the Economic Development Alternative for the Simpson Park Wilderness Area. A large portion of the area has a high or moderate favorability for minerals accumulation and carries a G.E.M. study rating of 3 or 4 in relation to occurrence of both metallic and non-metallic minerals. The mineral industry is extremely interested in a majority of the Simpson Park WSA. This interest can best be illustrated by the number of claims in T.23N., R.48E., Sections 21, 22, 27, 28, 32, 33, 34, 35 and the many claims along the eastern edge of the area in T.22N., R.48E.

The Keystone Mine which is located just a few miles north of the Simpson Park WSA, with similar geologic formations, produced and shipped some $4,900 worth of lead, zinc, and silver during 1948 and 1949.

The recently announced gold discovery at Tonkin Springs, a few miles to the north, will result in considerable interest by the mining industry in the entire Simpson Park Range. The new discovery is reported to contain approximately 1,300,000 tons of ore, grading 0.1 ounce gold per ton, in a deposit lying virtually at surface having an average thickness of 55 feet. The new discovery is reported to be within certain favorable rocks of the Vinini formation. Since these same rocks may occur within the Simpson Park WSA, the potential for mineral discovery could be high.

The numerous oil and gas leases in T.21N., R.48E. and along the western edge of the Simpson Park WSA as well as the geothermal potential must also be considered in evaluating the area.

The Nevada Department of Minerals feels that wilderness designation of any of the Simpson Park Wilderness Study Area would have a significant adverse impact upon the ability of the mineral industry to explore for and develop potential mineral deposits in the Area.

ANTELOPE WILDERNESS STUDY AREA (NV 060-231/241)

The Nevada Department of Minerals supports the Economic Development Alternative for the Antelope Wilderness Study Area. The area has low favorability for minerals accumulation and carries a C.E.M. rating of 2 in relation to occurances of both metallic and nonmetallic minerals.

Because of the lack of known mineral occurances in the Antelope WSA, the Department of Minerals feels that this area may serve as an excellent wilderness location. However, we feel that a comprehensive mineral survey should be conducted by either the U.S. Geological Survey or the U.S. Bureau of Mines to determine actual mineral potential. It is also recommended that the Bureau of Land Management closely monitor the activities of the Tybo Mine being operated by Silver King of Salt Lake City, Utah. The mine, located near Morey Peak, south of the WSA, may be affected by the wilderness designation.

As a closing statement, the Nevada Department of Minerals would like to emphasize the fact that preserving and expanding the mining industry in the State of Nevada is considered a corner stone in the Governor's Four Point Policy on Economic Development. The Department feels that wilderness designation of such areas as the Roberts and Simpson Park Wilderness Study Areas would be in direct conflict with the State's Economic Development plans. The Department does value preserving some public land for future generations and scientific study, as long as the mining industry, which is so essential to our national defense and this state's progressive economy, can remain healthy and be provided the opportunity to pursue new mineral resources.

Sincerely,

Paul Iverson
Deputy Director

PI/kc

Comment Letter 19

RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

1100 VALLEY ROAD P.O. BOX 10070 RENO, NEVADA 89520-0022 TELEPHONE (702) 784-6214

September 6, 1983

Ms. Linda Ryan, Director
Offices of Community Services
1100 East William, Suite 109
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and comment on the Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement which was prepared by the Battle Mountain District of the Bureau of Land Management (BAI NV #81100097).

Our initial comments will focus primarily on the overall scope of the Preferred Alternative in particular and the entire document in general. We feel the preferred alternative does not present any viable or long range solutions to the primary issue of how the Resource Area should be managed for livestock use, wild horse use, and wildlife habitat. The resource area has had a long history of range misuse resulting in ecological conditions and vegetative trends which are far below desirable levels. These conditions and trends are as much an issue today as they were ten or 20 years ago. We had hoped the DEIS and RMP would present a preferred alternative with a goal of maintaining or improving vegetative ecological condition, to at least a good or better condition, over a majority of the resource area. The goal level objective, in the long term, for a 9 percent change in ecological condition and a 12 percent change in trend will not begin to address the problem of correcting deteriorated range prevalent throughout the resource area. We question whether the preferred alternative will accomplish the stated goals when livestock AUM's will increase 3 percent in the short term and 11 percent in the long term and wild horses being maintained at the current number of 3,660. Considering the overall ecological range condition and trend, we would recommend the preferred alternative be dropped and an alternative developed that will provide a strong commitment towards overall improvement of range conditions. If livestock numbers are reduced, an action which should bring about improved range conditions, then monitoring can form the basis to adjust stocking rates upward. If stocking rates are initially increased and then monitoring shows a need for downward adjustment, this will only delay the process of securing improved range conditions for several more years.

It should not be implied that specific wildlife projects, HMP's, and various wildlife habitat goals are not needed, since specific projects will undoubtedly benefit local habitats and select species. We believe that over time, however, that range management which will bring about broad scale improvement in ecological range conditions will bring about broad scale and lasting benefits to all wildlife resources.

The second major concern with the DEIS and RMP is the commitment to maintain wild horse numbers at the current level of 3,660. Under the preferred alternative there are more AUM's allotted to wild horses than to wildlife. It would appear that more emphasis is being placed on horses than on wildlife; a concept we cannot agree with, nor do we suspect would be wholly supported by wild horse interests. We strongly recommend that the Bureau adjust these objective figures downward by at least 50 percent.

The remaining comments will be addressed to specific sections or pages within the document.

PAGE S-4

19-7 It seems inconsistent that under the Resource Protection Alternative there is a proposal to let horses increase in certain areas, while under the Economic Development Alternative wild horses would be reduced to provide more vegetation for livestock. If horses can be reduced for increasing livestock forage (Economic Development) why not reduce horse numbers under Resource Protection of wildlife forage?

PAGES S-6, S-7 TABLE S-1

Under the preferred alternative, a long-term change of +9 percent in ecological condition and +12 percent in vegetative trend is not, in our view, a very substantial commitment to range improvement. At this rate, with 4.3 million acres of public land in the resource area, only 387,000 acres will show ecological condition improvement. The level of improvement is not stated.

PAGE S-8

19-8 It is unlikely we could expect a 33 percent increase in hunter days. This is the projected long-term increase for the preferred alternative. We noticed a 33 percent increase in wildlife AUM's under the preferred alternative and wonder if a direct correlation was made. We do not feel there is a direct correlation between AUM's and hunter days, as there are a great number of other factors which influence hunter days.

Comment Letter 19

PAGE 1-2

19-9 No areas of critical environmental concern been identified. No explanation is given.

PAGE 1-5

19-10 The criteria to be used to adjust livestock stocking rates contain several qualifying statements which would seem to seriously weaken the ability to actually implement adjustments. If survey information is old or lacking, how can a 3 percent increase be substantiated? If stocking adjustments will normally be based on monitoring, when is this procedure not normally used? It also states stocking rates may be altered following the procedures in the grazing regulations. The lack of decisive wording may cause a considerable amount of problems when the need for stocking rate adjustments is identified.

PAGE 1-5, 1-6 ISSUE 3

19-11 We notice that the preferred alternative will contain actions to maintain viable and healthy herds of wild horses. However, actions to protect and enhance wildlife habitat will only be considered. Again it appears wild horses will have stronger management commitments than will wildlife.

PAGE 2-2 RESOURCE CONFLICT AREAS

We question whether each RCA has a unique set of resources.

The entire section of RCA's and selective management categorization presents some serious conflicts and a considerable amount of confusion. Presented figures show that 2,734,375 acres, out of a resource area total of 4,365,816, are in a less than good condition. This represents 63 percent of the resource area. It is not shown what the condition is, but merely states it is less than good. We strongly believe that the majority of this "less than good" is in fact in poor condition. It is also shown that 527,979 acres exhibit a declining trend. We feel these two figures are significant and that some very strong and far reaching land management decisions must be made to reverse trends and correct some very basic range problems. However, we see no such commitment being made in the selective management process. Only 1,683,708 acres, or 39 percent of the resource area, is proposed to be put in the I category to improve current unsatisfactory conditions. This would include only ten allotments out of a total of 48. Four of the proposed I category allotments are already under an existing AMP. Apparently the existing AMP has not brought about any range improvement.

We would recommend that at least the majority of these allotments in less than satisfactory condition be categorized as I. We suggest the following allotments be reviewed for inclusion in the I category.

19-12

1. Argenta
2. Copper Canyon
3. Austin*
4. Grass Valley*
5. Underwood*
6. Dry Creek*
7. Santa Fe*
8. Simpson Park*
9. Porter Canyon
10. Black Point*
11. Flynn
12. Shannon Station*
13. Three Mile*

* These allotments should have highest priority for removal from the custodial category. They have high wildlife values and for the most part are in poor ecological condition.

PAGE 2-8 WILDERNESS

We agree with the objectives and proposed management actions for wilderness.

PAGE 2-8 LAND TENURE ADJUSTMENTS

19-13 The identification of 104,959 acres for disposal has significant potential for conflict with wildlife resources. We hope this figure is not a target which must be met, but can be adjusted in response to resource conflicts. We presume all land disposals will be reviewed and considered on a case by case basis. This will allow for conflicting interests to have visible input to the decision making process.

Comment Letter 19

We see that livestock grazing preference would be adjusted subject to land disposal, but notice no commitments to mitigate or compensate for lost wildlife values or AUM's.

PAGE 2-11 UTILITY CORRIDORS

19-14 There may be some potential conflicts (sage grouse) with the O-R-K corridor. This should be reviewed and evaluated prior to the final EIS.

PAGE 2-12 WOODLANDS

19-15 Management actions should include stipulations that any removal proposals be coordinated and be compatible with wildlife resource values. We do not anticipate substantial conflict, but options for protection or selected management actions must remain open.

PAGE 2-12, 2-13 LIVESTOCK USE, WILD HORSE USE, AND WILDLIFE HABITAT MANAGEMENT

19-16 If the objective is to establish a grazing management program designed to provide key forage plants with adequate rest from grazing during critical growth periods, why the objective for establishment of only 15 AMP's at the end of the long term? There are presently 25 allotments under year long grazing and on six allotments, grazing occurs from early spring to early or late winter. This would appear to preclude attainment of the stated objective.

To authorize livestock use at 246,535 AUM's when 2,734,375 acres (63 percent) of the resource area is in less than good condition is questionable. This is further compounded when 29 allotments will be managed custodially, only ten proposed for improvement, with only 15 AMP's proposed. We would estimate that overall range condition and trend will not show any substantial improvement. We feel livestock numbers must be set at lower initial levels to give any meaningful commitment to improving vegetal condition. If improvement is then documented, numbers can be adjusted upward based on adequate monitoring data.

The Preferred Alternative proposal to maintain wild horse numbers at the 1982 level of 3,600 is not acceptable. The resource area will be assigning 43,512 AUM's to horses and 26,241 AUM's for big game. Even for the long term, only 34,980 AUM's will be assigned to big game. We recommend the Bureau seriously consider adjusting the wild horse objective number down by at least 50 percent and big game AUM's up.

PAGE 2-14

We question the blanket statement that spray, plow, burn, and seeding of 18,000 acres will benefit wildlife. Benefits can occur in very specific locations if specific guidelines and stipulations are included for wildlife in the project design.

We fully concur with the objective to improve and maintain in good or better condition aquatic and riparian habitat on 34 miles of streams. However, the resource area has a total of 199 miles of streams and 34 miles will constitute only 23 percent of the total. We hope this figure can be adjusted upward in any preferred alternative to include at least 50 percent of the total stream miles. We think that since there are only 199 miles of streams in 4.1 million acres, the importance and management of these areas is critical. Likewise, we would recommend the 400 acre commitment for improvement of meadows, springs, and aspen be adjusted upward by at least 50 percent. The importance of riparian areas, particularly in an arid area, cannot be overemphasized. Since total riparian habitat is so small and wildlife so dependent on them, it is imperative that the majority of these areas be maintained in at least a good condition.

The objective to burn 1,000 acres to improve wildlife habitat will need serious evaluation and consultation before any plans are proposed.

IMPLEMENTATION OF THE RMP

PAGE 2-30

19-17 There is no mention of the level or intensity of monitoring.

PAGE 2-31

19-18 We would like to see an evaluation of land exchanges in addition to land disposal. The blocking up of public lands through exchanges would create a high potential to initiate management systems or projects that would otherwise be unfeasible on current checkerboard lands.

PAGE 2-32

The objective to closely coordinate RMP's with AMP's is a good objective and we definitely favor this approach. Any wildlife management plans must be closely integrated with grazing plans because grazing, in most cases, has the greatest overall impact on wildlife habitat in the resource area.

We concur with the procedures outlined to manage or protect riparian or aquatic habitat. We also agree that whatever method is used should be determined on an individual basis for each stream or riparian area.

We agree that grazing treatments must be designed to provide forage for consumptive use while maintaining proper and judicious use levels for key forage species. However, we feel the Bureau must set definite utilization levels as a goal. It will be very important to set utilization levels on key wildlife forage species and for riparian species.

PAGE 2-33

The concept of implementing intensive grazing management sounds good, but in reality it falls far short of addressing degraded ecological conditions on a sizeable portion of the resource area. With only 13 of the total 48 allotments designated for AMP's or intensive grazing management in the long term, it leaves a vast amount of area to be managed in a custodial manner. Much of the area designated as custodial is in less than satisfactory condition.

PAGE 2-34

We would consider that 45 percent utilization on shrubs by livestock to be excessive in identified big game winter range.

PAGE 2-35

19-19 It is stated that monitoring levels in "maintain" and "custodial" allotments will be of low intensity. This merely compounds the problem of so many allotments being placed in the custodial category. Without monitoring data, will there be adequate data available to place these allotments in an improve category at a later date? It does appear that custodial allotments are simply being "written off" as unmanageable and that in most cases they will remain in unsatisfactory condition.

STANDARD OPERATING PROCEDURES

PAGE 2-35

19-20 #4 If visual resource procedures conflict with the needs and constraints for other resource values, is there any criteria to select alternatives? There is a potential that visual resource guidelines can be in direct conflict with wildlife resource values. Decisions or conflicts should be on a case by case basis and include mitigation for all resources.

#6 We notice that fences in wild horse herd areas will be located to minimize interference with normal distribution and movement of wild horses. We see no standard operating procedure that will do the same for wildlife, and strongly recommend the inclusion of such a procedure.

PAGE 2-36

19-21 #16 For spring improvement it is stated that "water will also be left at the spring source where appropriate." Under state law it states that "wildlife which customarily uses the water will have access to it." Under these conditions, water must be left at the source. We would also suggest that all spring sources be fenced when improved or developed. Also no water development should take place when there would be insufficient water left at the spring source to maintain the existing amount of mesic vegetation in a satisfactory condition.

19-22 #17 We would recommend changing the procedure to say that bird ramps will be installed in all troughs.

19-23 #19 We recommend that "where practical" be deleted.

We recommend that the following Standard Operating Procedures be adopted:

1. Crested wheatgrass seedings will not be located in key wildlife habitats.

2. Emphasis will be placed on the management of browse on key mule deer winter range.

19-24 3. Vegetative manipulation that would alter the potential natural plant composition will not be allowed in riparian areas. For the purpose of riparian management, crested wheatgrass is not considered a native species.

4. Time of day and/or time of year restrictions will be placed on construction activities associated with transmission and utility facilities, leasable and salable mineral exploration, and/or development that are in the immediate vicinity or would cross crucial sage grouse, deer and pronghorn antelope winter habitats, antelope kidding areas, or raptor nesting areas.

AFFECTED ENVIRONMENT

PAGE 3-5 TABLE 3-1

19-25 We question the validity of the table showing 112.3 miles (71 percent) of the aquatic habitat to be in fair to good condition and 2,140 riparian acres (47 percent) to be in good to excellent condition

Comment Letter 19

19-25 in the resource area. We feel that both categories would contain a significantly higher percentage in the poor condition class. Also in the narrative section for RCA's it is stated that the majority of the riparian and aquatic habitat in the North Shoshone RCA is in good or fair condition. We disagree with this evaluation.

PAGE 3-8

We question the statement "ecological condition and vegetation trend data documenting the decline in site condition is not available." Maybe precise, quantifiable data is not available, but few would question that large acreages are in a severely deteriorated ecological condition resulting from invasion by less desirable species, a loss in density and diversity of desirable species, and reduced vigor of remaining desirable species.

PAGE 3-10 TABLE 3-3

We question the figures presented in the table. We feel the percentages presented for fair, good, and excellent ecological condition are greatly overestimated and present a very optimistic evaluation of current conditions.

ENVIRONMENTAL CONSEQUENCES

PAGE 4-5

Seedings may indeed defer livestock use on native spring range to be used for wildlife. However, spring range forage in the form of green grass (annuals) is probably the most abundant forage in the resource area and is not a primary concern for wildlife. With the abundance of cheatgrass, competition for "succulent growth" in the spring is of low concern. If seedings would decrease AUM's on native range, they could prove beneficial. We have seen few seedings, designed primarily for livestock which are supplying needed forage for wildlife. There is a potential for seedings which can be designed to provide true multiple use benefits.

PAGE 4-6

We certainly agree that HMP's and habitat improvement projects will benefit wildlife, but to say they will improve wildlife habitat by one condition class on 30 percent of all wildlife habitat seems overly optimistic. We feel the greatest overall improvement in wildlife habitat will come through the implementation of grazing programs with objectives of improving ecological condition to good or better condition.

Ms. Linda Ryan
September 6, 1983
Page 10

PAGE 4-9

19-26 It is stated that adjustments in grazing use would be required in RCA's with declining trend. However, only 11 percent of resource area is identified as having a declining trend. There are many areas in a stable, but poor condition. Will there be no adjustments in these areas?

In summary, we hope the Bureau would focus on revising the Preferred Alternative to address what we perceive as the two major issues. These issues would be the commitment to manage the resource area to achieve a good or better ecological condition on a majority of the area and to reduce wild horse numbers to a reasonable level. Since wildlife is a product of habitat and its availability and condition we believe that wildlife will ultimately benefit over the long term by maintaining good or better ecological range condition.

Sincerely,

William A. Molini

William A. Molini
Director

DE:pw

cc: Commissioners
Regions I, II and III
Paul Bottari
Rose Strickland

Comment Letter 19

FEDERAL IMPACT
REVIEW PROGRAM

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

[illegible]

X Agriculture

[illegible]

X [illegible]
X [illegible]

[illegible]
[redacted]
X [illegible] Natural Resources
XX Wildlife

Conservation and Natural Resources

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

FROM: [illegible]

SAI No. 83300097

PROJECT: Draft Shoshone-Eureka Resource Management Plan and EIS

[illegible] Please evaluate it with respect to: [illegible] State and/or [illegible] goals and objectives; [illegible] regulation with which you are familiar and/or [illegible]

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [redacted] [illegible] your comments if applicable. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT [illegible] If you are unable to comment by the [illegible] please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

[illegible] No comment on this project
[illegible]
[illegible] Additional information (see below)
Conference desired (see below)
Conditional support (outlined below)
Disapproval/denial of funding (must specify reason below)

[illegible] (use additional sheets if necessary)

The Preferred Resource Management Plan is acceptable with one major exception. The Roberts (NV-060-541) wilderness study area has been shown by the recently completed GEM study to have high mineral potential. The area is geologically similar to nearby areas within which disseminated gold and barite have been discovered. Mineral exploration activity is high in nearby mountain ranges, and will no doubt extend to within the proposed wilderness area. The Roberts area, as well as the nearby Simpson Park area should not be recommended for wilderness designation.

[signature] Geologist NBMG 784-6691 8/3/83
Signature Title Phone Date

Comment Letter 20

20

Eureka, Nev.
Sept 15, 1983

H. James Fox
District Manager
Bureau of Land Management
Battle Mt. Nv 89820

Dear Mr Fox.

I would like to Comment on the proposed Antelope Mt. Wilderness area. I believe there are to many roads, ranches and man made improvements to have the solitude that is expressed in the Wilderness specifications. Almost everywhere on the Antelope mountain a person can either see a ranch, improved roads, spring developments, fences and therefore I do not believe it has the qualifications to be declared a Wilderness area.

Sincerely yours
Richard McKay

08

Comment Letter 21

MEC
MINERALS EXPLORATION COALITION
Minerals Advocacy in Public Policy

12000 West Cedar Drive
P.O. Box 15630
Denver, Colorado 80215
303/989-1567

September 21, 1983

H. James Fox
District Manager
Bureau of Land Management
P. O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

These comments constitute the response of the Minerals Exploration Coalition (MEC) to the Draft Environmental Impact Statement and Resource Management Plan, Shoshone/Eureka Resource Area, Nevada. The MEC is a coalition of exploration companies and individuals conducting exploration on public lands.

We believe that all areas with mineral and energy potential should be excluded from wilderness designation, even though no economic deposit is now known. Withdrawal limitations will preclude the collection of new data and new areas of mineral potential will not be found. With new discoveries effectively stopped, a policy of excluding all currently known areas of mineral potential from wilderness should be followed so that exploration will not be restricted and minerals might yet be produced. We believe that land use decisions should conform to the BLM Mineral Resources Policy of December 1, 1982, which states that "mineral exploration and development can occur concurrently or sequentially with other resource uses."

The Shoshone-Eureka resource area is rich in minerals, and new geologic and exploration concepts indicate the possible presence of geothermal energy and oil and gas. In the past, Mining has produced a major part of the income and employment in Eureka and Lander Counties and it promises to do so in the future. This represents a major part of the economic base of the State.

Comment Letter 21

Decisions resulting from the land use plans and the review of suitability of wilderness areas should assure the continued viability of this economic base. The areas of mineral and energy resources potential should remain open to application and development so that future economic resources can be found and extracted.

Any part of the land use plan or wilderness recommendation that withdraws mineral lands or restricts access, reduces the possibility of discovery of mineral or energy resources. Therefore, NEC opposes the Preferred Resource Plan because areas of significant mineral and energy resource potential in the Antelope and Roberts WSA's would be withdrawn from mineral development. Possibly some parts of these WSA's without mineral or energy resource potential could be recommended for wilderness.

Of the alternatives presented, NEC favors the No Action Alternative.

Thank you for the opportunity to comment on this Draft Environmental Impact Statement and Resource Management Plan for the Shoshone/Eureka Resource Area, Nevada.

Sincerely,

John B. Wells
President

JBW/lo

Comment Letter 22

AtlanticRichfieldCompany
515 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

September 28, 1983

Mr. E. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

Re: Draft Shoshone-Eureka Resource Management Plan

Dear Mr. Fox:

Atlantic Richfield Company appreciates having the opportunity to provide comments to the Bureau of Land Management (BLM) regarding the draft Shoshone-Eureka Resource Management Plan (RMP) and Wilderness EIS.

Atlantic Richfield earlier provided information to your office regarding our evaluation of the area's energy and mineral potential and our concern for its full consideration in the resource management planning process (see attachments). At this time, we would like to reinforce our position with specific comments on the draft RMP.

As earlier set forth, we are very concerned that energy and mineral resources be fully incorporated into the Bureau's land planning processes. We maintain that because the RMP will guide the long-term management of public lands in the Resource Area, it is imperative that energy and minerals be explicitly treated within the plan's framework to ensure that these resources receive equal consideration in resource allocation decisions. Activity plans that will be developed for wildlife habitat, wild horse herds, and woodland areas should fully integrate minerals data in their formulation; it is difficult to see how such integration can take place without explicit treatment of energy and minerals in the plan. For example, wildlife habitat stipulations or identification of critical habitat requirements can place seasonal or permanent restrictions on mineral development. The RMP states that the Preferred Alternative will only recommend areas for wilderness where the wilderness values and related benefits offset the other uses foregone because of such designation. Energy and minerals, one of these other uses, should be given the status

afforded wilderness, livestock, wildlife, and woodland values in the plan, all of which are identified as planning issues. While other BLM regulations such as Parts 3802 and 3809 provide a case-by-case mechanism for resolving site specific conflicts between minerals and other resource values, it is nonetheless important that this type of information also be fully weighed in resource planning.

Because of the indirect treatment which energy and minerals is given in the draft RMP, it is difficult to assess the full impact which planning recommendations are likely to have on these resources. Our evaluation indicates that the wilderness study areas in Shoshone-Eureka Resource Area have oil and gas resource potential, and the Roberts MSA has a geologically favorable environment for the occurrence of significant minerals. The preliminary recommendation of wilderness suitability for Antelope and Roberts would effectively preclude future development of this potential.

22-1 In summary, we urge the BLM give more explicit consideration to energy and minerals in the resource management planning process for the Shoshone-Eureka Resource Area. Such consideration will help ensure that balanced resource allocation decisions are made to further the public interest.

Sincerely,

J. R. Mitchell

J. R. Mitchell

JRM:JFO:drm
Attachment

Comment Letter 22

Telephone 303 575 7577

J R Mitchell
Public Lands Coordinator

December 17, 1982

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Re: Shoshone-Eureka Resource Management Plan
Nevada

Dear Mr. Fox:

Atlantic Richfield Company appreciates the opportunity to comment on the Bureau of Land Management's Revised Planning Issues and Criteria for the Shoshone-Eureka Resource Management Plan in Nevada.

On June 1, 1981, Atlantic Richfield submitted comments to the BLM regarding issues we believe must be an integral part of the planning process for the Shoshone-Eureka RMP. We subsequently submitted energy and mineral information to BLM as part of the inventory phase of the planning process to substantiate our issues. Therefore, we would like an explanation from BLM as to why it was decided not to include our issues in the planning process for this RMP. We contend that BLM is required by law to determine whether mineral uses or nonmineral uses are the highest and best use of the public lands as evidenced by public interest. As a result, we are concerned with the apparent inequity between energy and mineral resources and other resource values and that energy and mineral resources are not receiving the same full consideration during the planning process. It is made clear in the Federal Land and Policy Management Act that land management must recognize the nation's need for domestic sources of minerals, yet it has been our recurring experience that these resource values have been all but ignored during the planning process and only mitigation measures for energy and mineral activities on other resource values have been addressed. Section 102(a)(12) of the Federal Land Policy and Management Act (FLPMA) stipulates that "the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals...from the public lands including implementation of the Mining

and Minerals Policy Act of 1970, as it pertains to public lands." The Public Lands and Resources; Planning, Programming, and Budgeting (43 CFR Part 1600) regulations require the following measures for planning:

- Present and potential uses of public lands shall be considered
- Resource demand forecasts and analyses relevant to the Resource Area
- Opportunities to meet goals and objectives defined in National and State Director guidance
- The District Manager or Resource Area Manager shall arrange for resource...data and information to be collected.
- Several complete, reasonable resource management alternatives shall be prepared for the Resource Area.

It must be noted that the term "resource" applies not only to renewable resources, but also to nonrenewable resources. Therefore, the above requirements must be applied to energy and mineral resources as required by law. While certain, reasonable mitigation measures may be necessary, a complete evaluation of energy and mineral resource potential must be made in order to provide the same opportunities for energy and mineral resource development that are afforded other resources.

We realize that it is difficult for a complete evaluation of energy and mineral resources to be made during this process, due to the nature of the resources themselves. Nevertheless, a decided effort must be made by the BLM to gather as much information as possible in order to determine what resource values actually exist in a particular planning area so that appropriate planning decisions may be made.

Attached is a copy of an energy and mineral rating system as outlined in the December 10th Federal Register. We believe the BLM should use such a

rating system to gather energy and mineral potential data from industry and other government agencies for utilization during the planning process and for wilderness study. We would like to point out, however, that these ratings would reflect current knowledge and technology and must be subject to modification should new information become available. This is especially true due to the nature of exploration activities and the possibilities that new information or technology could shed new light on the areas' potential.

Atlantic Richfield believes that energy and minerals must play a major role in land management decisions. The exploration for and development of these resources should be provided for in this plan by opening or maintaining access to areas which may contain these resources. Areas identified as having energy and mineral potential should influence other resource decisions. Access to these areas should be restricted only by the minimum legal standards established for environmental protection. In areas where conflicting resource values may outweigh mineral values, the BLM should identify what minimum environmental protection is necessary to meet the plan objective for these resources.

It is important for the BLM to recognize how energy and mineral resource values should influence the land management decisions and the role of minerals in the formulation of management prescriptions. In order to comply with the FLPMA requirements and to achieve the goals and objectives of multiple use management, the BLM needs to:

1. To provide for mineral resource and development on BLM lands.
2. Identify lands having energy and mineral potential and take action to open or maintain access to those resources, while meeting minimum legal standards for environmental protection.
3. Identify where conflicting resource values outweigh mineral resource values and what

minimum standards for protection must be met to meet the plan objectives.

The BLM is required to show the effects of alternatives on all resource values, including energy and mineral resources. Each of the management alternatives selected must identify the tradeoffs that would occur as a result of the possible implementation of that alternative as it relates to energy and mineral values. The tradeoffs should include: opportunities and restrictions for access to minerals, minimum protection stipulations required under each alternative, and analysis of relative value placed on each conflicting resource.

The District Manager is required to develop a preferred alternative which will be meet national and State Director guidance. After the preferred plan alternative is ultimately selected and published, each prescription for management should describe the specific impact on energy and mineral resources. This should include: the minimum standard requirements for surface protection upon issuance of leases, permits and plans of operation; and what additional requirements if any, are to be placed on these activities in order to meet the objective of the prescription. Also, the prescription should give rationale as to why normal standards are not sufficient to protect the land use objective.

With regard to the wilderness studies, the BLM's Wilderness Study Policy dated February 3, 1982, Criterion No. 2; Standard No. 1 Energy and Mineral Resource Values, states, "Recommendations as to an area's suitability or nonsuitability for wilderness designation will reflect a thorough consideration of any identified or potential energy and mineral resource values." In other words the planning process requires full consideration of these resources and an assessment of impacts to their use and management. We believe that it is the responsibility of BLM to develop an energy and mineral alternative in order to comply with the Wilderness Study Policy directive.

The energy and mineral alternative would place emphasis on resource development by providing

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opportunities for commodity production in areas having significant possibilities for resource development. This would mean that areas with good or high mineral potential would be recommended for a nonwilderness designation. The remaining areas which are void of other conflicts and which still possess wilderness values and are capable of being managed as wilderness could be recommended as suitable for wilderness.

In order to prepare an energy and mineral alternative, BLM would utilize the energy and mineral inventory data which has been gathered during the study process. This information would provide the basis for boundary adjustments on areas where such an approach is feasible or would provide the basis for a nonwilderness recommendation.

Atlantic Richfield supports effective land and resource management plans and actions that provide for reasonable protection of the environment, while at the same time, providing for the exploration and development of natural resources. The development of uniform, workable, and effective management standards for natural resources under the jurisdiction of the BLM is of utmost importance. Inflexible environmental laws and regulations have often characterized the manner in which the government has constrained the search for and development of additional energy and mineral supplies. Such constraints have severely limited the accessibility and utilization of energy and mineral resources needed to add stability to the Nation's economy and to reduce its dependence on insecure foreign imports. However, the BLM is not required to continue in this mode of management. It has an opportunity to develop land management standards and guidelines along the multiple-use concept that will help remedy the situation.

In conclusion, we urge that the BLM carefully consider our comments in order that the Congressional mandates of FLPMA and the Mining and Minerals Policy Act are fully implemented and to insure that energy and mineral resources are afforded full consideration in the land management planning of the public lands.

Sincerely,

J. R. Mitchell

CMM:drm

Comment Letter 22

[illegible]Company
[illegible]
Denver, Colorado 80217
Telephone 303 575 7577

J A Mitchell
Public Lands Coordinator

July 1, 1981

Mr. Michael C. Mitchell
Bureau of Land Management
Battle Mountain District Office
P.O. Box 194
Battle Mountain, Nevada 89820

Re: Shoshone-Eureka Resource Management Plan
Battle Mountain District

Dear Mr. Mitchell:

Atlantic Richfield Company and its subsidiary, the Anaconda Copper Company, appreciate the opportunity to present its comments and recommendations to the Bureau of Land Management (BLM) on land use and energy resource potential of the Shoshone-Eureka Resource Area in Nevada.

Atlantic Richfield Company is gravely concerned about the nation's dwindling supply of domestic energy resources and its continuing dependence on insecure foreign oil imports. We are particularly disturbed over actions by the Federal Government that threaten to deny the public the right to seek energy and mineral resources that the BLM include in its final Shoshone-Eureka Resource Management Plan (RMP) the necessary provisions to encourage the exploration for and appropriate development of the energy and mineral resource potential of the entire resource area.

Oil and Gas

The Shoshone-Eureka Resource Area contains energy resource potential. For example all five of the Wilderness Study Areas (WSA) (NV-030-108, NV-030-110, NV-060-231/241, NV-060-428 and NV-060-541) contain oil and gas resource potential.

Geothermal

Further, the entire planning area lies essentially within the well-documented region of high geothermal energy potential, the Battle Mountain heat-flow high. With regard to geothermal resources, this segment of the Basin and Range is typified by heat flow anomalously above even the regionally-elevated

thermal regime. This is illustrated by the widespread distribution of hot springs in the planning area from Dixie Valley southeast to Big Smoky and Monitor Valley and northward to the Crescent Valley-Battle Mountain area. Exploratory geothermal drilling has demonstrated the presence of high temperature (greater than 400°F) resources at the boundaries of the planning area in Dixie Valley and the Beowawe area.

Additionally, numerous geothermal leases have been issued within the planning area and active exploration in this largely unevaluated zone is underway in a number of instances. Existing evidence points to the presence of high-temperature geothermal resources at shallow economic depths (less than 8000') and thus to the likely development of reservoirs capable of supporting electricity generation. Furthermore, there is substantial potential for direct usage applications of the geothermal resource throughout the area.

Minerals

The Anaconda Copper Company has one property, Eastgate Zeolite, as described below, located in the Battle Mountain District.

Eastgate Zeolites

County:	Churchill
Location:	Adjacent to U.S. Highway 50, and 50 miles east of Fallon, Nevada.
Land Description:	21 unpatented placer claims (420 acres) subject to production royalty of 5% Net Profit
Future Acquisitions:	Some acquisitions are planned for the future.
Impact:	Located approximately 6 miles west of WSA 030-110 Desatoya Mountains (48,150 acres).

Anaconda does have an interest in several of the WSA's in the district; Desatoya Mountains, Roberts Mountains, and Simpson Park. All are considered to have geologically favorable environments for the occurrence of significant minerals. The following is a summary of the geology and mineral occurrences in each WSA.

Augusta Mtns.

Chiefly sedimentary rocks of Triassic-age which are comprised of sandstone, shale, conglomerate in the lower part of Augusta Sequence and limestone, shale and sandstone of the upper part of the Augusta Sequence. Volcanic rocks are mostly Tertiary ash-flow tuffs.

Mercury was produced from the Wild Horse Mining district located in the Southern part of the mountains.

Desatoya Mtns.

Consists almost entirely of volcanic rocks of Tertiary age, gently east dipping ash flow tuffs and tuffaceous sedimentary rocks. Locally, the volcanics are intruded by dikes of felsic and mafic intrusive rocks.

The Gold Basin Mining district, located in the Southern part of the Mountains produced 100 tons of ore in a 1912 operation. Occurrences of mercury and uranium are south of this district.

Antelope

The Antelope Range is underlain by carbonate rocks. Along the county line, the rocks are overlain by volcanics consisting largely of andesitic flows and pyroclastics.

No known mineralization occurs in the WSA.

Simpson Park

Largely made up of chert, shale, quartzites of Ordovician and Silurian age. Volcanic and pyroclastic rocks underlie much of the north and south parts of the range.

The Roberts Mining district is located on the west side of the Simpson Mtns. Keystone Mine is the only producing property in this district. Copper, silver, lead, and zinc were mined.

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Roberts Mtns.

Essentially an eastward tilted block composed of complexly deformed chert, shale and sandstone, the area is overlapped on the east by volcanic rocks.

No known mineralization occurs in the WSA.

References

1. Mineral and Water Resources of Nevada, Bulletin 65, MacKay School of Mines.

2. Geology and Mineral Resources of Eureka Co., Nevada 1967.

3. Radioactive Mineral Occurrences in Nevada, Larry J. Garside, Bull. 81, 1973.

4. Geology and Mineral deposits of Lander County, Nevada, 1977.

Atlantic Richfield Company supports the multiple-use management concept for the nation's public lands and believes that the best interest of the nation will be served if they are managed in this manner. Also, we believe that the public has the right to know what resource potential exists on public lands prior to the imposition of far-reaching land withdrawal decisions. Accordingly, we recommend that the final RMP for the Shoshone-Eureka Resource Area include provisions and compatible land use allocations that encourage exploration and appropriate development of the energy and mineral resource potential of the entire area, including the five WSA's that are being considered for wilderness designation.

Again, we appreciate the opportunity to comment to the BLM on this important issue.

Sincerely,

J. R. Mitchell

JRM/CMM/drm
Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca 94105

SEP 21 1983

Mr. N. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled RESOURCE MANAGEMENT PLAN FOR THE SHOSHONE-EUREKA RESOURCE AREA, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2 (lack of objections - insufficient information). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Baramian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

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

Enclosure (1)

Water Quality Comments

On page 4-1, it is stated that impacts to water quality and soils were analyzed, found to be insignificant and therefore would not be discussed further. The DEIS does not indicate how this conclusion was reached (i.e., what supporting data, references or technical studies were used).

23-1 The DEIS discusses poor quality wetlands-riparian and aquatic habitat areas but does not identify probable associated water quality problems. The FEIS should identify water quality conditions in the resource area and assess direct and indirect impacts to water quality associated with the various levels of grazing, mining, harvesting, etc., under the different alternatives. General soil type and characteristics (i.e., soil erosion potential) should be discussed in conjunction with water quality. Mitigation measures should be provided under all alternatives to ensure protection of good quality and improvement of poor quality waters (including areas downstream of the resource area which may be impacted), in accordance with State-Federal Water Quality Standards and Best Management Practices. The FEIS should also discuss ground water quantity and quality in the resource area and assess impacts as a result of the proposed land uses.

Pesticide Comments

The only mention of pesticide use is on page 2-36, which states: "Application of herbicides, such as 2,4-D, on proposed treatment areas to reduce sagebrush and other plant species will be in accordance with procedures established in Bureau Manual 9222 to insure nonimpairment of other-than-target species." This statement does not adequately address pesticide concerns.

23-2 The FEIS should identify the approximate areas to be treated with pesticides, and discuss application of pesticides to maintain the rights-of-way proposed.

These pesticide issues should not be deferred to project specific environmental assessments or impact statements, but should be addressed in the FEIS as impacts of the Resource Management Plan itself (for all alternatives).

MULL & McCARTHY

September 20, 1983

Mr. H. James Fox, District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Re: Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement

Dear Mr. Fox:

At the request of Mr. Daniel H. Russell, owner of the Russell Fish Creek Ranch, including the Willows Ranch, both ranches located within the area covered by the above-mentioned report, I have reviewed the draft management plan and submit comments as follows.

With the federal government maintaining ownership over so great a percentage of the State of Nevada, we believe that any plan drafted for control of that land should not only consider, but prospectively encourage and foster, the health and stability of the livestock industry. Where the conditions surrounding the management of ranches in Nevada are such that earnest livestock operators will engage in the management and development of ranches with an eye toward lasting and long-term productivity, significant benefits from that enterprise would flow not only to the existing area in terms of additional employment and economic activity, but also to the public in general in terms of a strong agricultural industry and a lasting interest in long-term range productivity. Therefore, we believe that the criteria for Issue 5 on page 1-5 should be changed from a consideration of the economic health and stability of the livestock industry to placing that concern in a position of high priority.

Livestock Grazing:

The basic goal of the plan relating to livestock grazing should be to encourage the use by each ranch

of that unit's full preference allocation, consistent with long-term forage stability goals. If the forage so allows, that basic preference allocation should be increased, consistent with other forage-related goals of the area. Any forage management plans should consider the need for a consistent economic framework within which capital investments may be made and properly amortized. Further, that plan should be coordinated with other goals to provide for flexibility in special circumstances and experimentation with numbers of livestock in areas where the lack of available data would otherwise place unreasonable restriction on the numbers of livestock that could be grazed simply to be "on the safe side". Finally, any livestock management system should minimize the efforts of ranch personnel which go into meetings, studies, and other activities which might tend to increase the marginal variable costs of a ranching operation.

Of those alternatives identified in your plan, the economic development alternative tends to most closely conform with the goals articulated above. The combination of an increase in livestock grazing, as well as a long-term positive effect on vegetation (page 4-41) would appear to be an optimum combination, and the benefits identified in your report would more than likely be increased by additional private capital investment on private land encouraged by the economic viability of the ranches.

As to improvements on the range, we would strongly encourage maximum range improvements be effected upon the area with an emphasis upon those areas which have serious resource conflicts, and which require improvement as identified in your "improvement" categories. Where appropriate, cooperate investment between private individuals and government should be encouraged. In that vein, we strongly support the concept used in some Bureau of Land Management districts whereby some percentage of the grazing fees are directly allocated back to the payor ranch by way of funding of range improvements. We believe the vegetation manipulation is an important role of the government, and should be encouraged to the maximum extent possible.

The cooperative roles between the rancher and the government should also be emphasized in the area of range improvements and their benefit to the overall goals of the range. Were it not for the economic productivity of that range (i.e., fees paid by the rancher) and the cooperative agreements by which the ranchers maintain things such as spring developments, the overall usability of the range by all users would be affected.

Wild Horse Use:

Viable herds of sound, healthy, wild horses should be managed at numerical levels no greater than those present at the time the Wild Horse Act became law, and those wild horses should be managed in places where they occurred at that time. Where serious conflicts arise between the management of horses and other goals, the wild horse number should be adjusted to allow the attainment of livestock use objectives, and forage objectives in that it is extremely difficult to manage forage by way of rest when horses remain in unmanageable numbers. Further, the wild horse number should be adjusted to take into account the encouragement of big game and other species. If the appropriate number of horses to meet the goals addressed above is unacceptable, additional forage development should be undertaken by the Bureau and lands made available for conversion to private use such that forage deficiencies can be addressed.

The economic development alternative appears to be the most acceptable in terms of dealing with wild horses.

Land Tenure Adjustments:

The acquisition of land by private parties in appropriate areas should be encouraged in order to maintain and increase the overall productivity of the resource area. Goals to be furthered by land acquisition would be to allow private holdings to "block up" areas, thereby providing a more economic flow of men, machines, and cattle, and more economic operations; to encourage private development of forage for either cutting and feeding or grazing on lands within existing operational

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boundaries, particularly where that private development would relieve pressure on the public range during particular periods (i.e., spring, summer, fall, or winter, depending upon the particular shortage of that ranch); and, to increase the overall "real property holdings" of existing operations such that a more stable capital picture is achieved.

24-1 The economic development alternative appears to provide the strongest emphasis in land tenure adjustment. It did not, however, appear that the concept of using land tenure adjustments to complement existing range problems was addressed in any of the alternatives, and it would appear that land tenure adjustment is a proper tool to foster the overall health of any cattle operation's total feed picture, including range forage.

Riparian Management:

While riparian areas are important for wildlife in general, they also provide significant feed and watering for livestock. While the exclusion of cattle on a short-term basis to achieve management objectives is not in itself objectionable, any plan should include the use of important areas by livestock in a long-term manner which achieves multiple objectives.

24-2 Under the area of miscellaneous comments, I would note on page 2-36 under paragraph 15 that the goal of making water available in allotments for wild horses and wildlife is a proper goal of range management, but making particular efforts to provide water in rested pastures would appear to conflict with the basic concept of rest.

Finally, any overall approach toward range management should place an emphasis upon allowing the range user greater flexibility and discretion in use pattern decisions, while at the same time placing on that range user responsibility for long-term range productivity. It is my impression that that sort of system is reflected in the basic approach of the "stewardship" system which is now being implemented in the Tonopah resource area.

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We appreciate the opportunity to submit comments on the report and would further appreciate continuing notice regarding your process of decision.

Very truly yours,

MULL & MCCARTHY

By
Thomas S. Van Horne

TVH:elo
cc: Mr. Daniel M. Russell

Comment Letter

Testimony

EUREKA, NEVADA PUBLIC HEARING TESTIMONY

Bill Card, Rancher, Eureka, Nevada

T1-1 The first question I have is on the Antelope Wilderness Area. You've got an estimated 1,200 visitor hours, in addition to whatever the visitor hours are supposed to be out there now. My first question is, what provisions do you have for taking care of these people that will be out there using this wilderness area?

T1-2 Along the same lines, wilderness area, I wondered what provisions are there to keep the road open out there? It will take a snow plow to get past my place four to six months out the year.....If it becomes a wilderness area, this has to be taken care of; because snow or no snow, no matter how much, people are going to try to go through anyway. They do it. They go up there and get stuck, and it's up to me to take care of them again.

The same thing happens in the summertime...I don't want the responsibility of having to take care of these people.

T1-3 There's something about not driving vehicles onto the wilderness area. Most of this wilderness area, the Antelope, is on my permit, my ranch. I don't know what percentage, but just about all of it. I need to be able to get on there with my pickup to be able to handle it.

Bob Millard

T2-1 We would like now, since the BLM has changed their policy and no longer wants to acquire checkerboard land -- We are asking that in the Battle Mountain area they consider making Sections 14 and 24, in Township 31 North 46 East, available for private parties to purchase or bid on.

Jay LaVar Young

T3-1 In looking over this, the Kingston allotment, they have listed 30 horses under this -- existence. And I don't think -- I don't know when they've counted these, or what, but there isn't any horses. I've been there since I was a boy, and I've never seen a wild horse in that area, for years and years. I don't know where they came up with this figure. There is a few burros up on the forest, but not on the BLM.

My dad, Chet Young, is also very concerned about this, and the number of AUMs that they are leaving for wildlife. We are definitely for wildlife, but down in these lower altitudes, we don't have deer. There is a few chuckers, and there is no antelope in there. And I question -- I think in the Kingston allotment they have existing wildlife demand of 490 AUMs, which is very concerning to use as cattlemen in there.

T3-3 Next, I run both Kingston allotments and Simpson Park, also. They have 78 wild horses in the Simpson Park allotment. In the southern part, in looking over their map, I take it that most of these should be in there. There is a few burros, also. That same herd moved from the Kingston and back to the Simpson Park allotment; they count the same ones, if you counted them back and forth over. I have not seen wild horses in there, also.... We feel that you've made a mistake when we pull back on 354 AUMs out of that Simpson Park.

T3-4 Number two that concerns us in that area as ranchers has been covered some today as land disposal. We are very concerned over the land that has been picked for disposal in some areas. We feel that there's a great deal of land in the area that is good farm land, and water is available to farm this. It is not on your existing maps as land that could be purchased, or land disposed on this....

We would like them to reconsider, also, some other land disposal on some of the better land, so that the neighboring ranchers who are not necessarily interested in the land disposal for the growth of individual public and such as that -- We're more interested in growth of our own.....

In order to stay in business and to stay in competition, we need to be bigger, and we need to have more ground to do this. The only way we can turn is to BLM ground that adjoins us, and close enough that we can operate it.

RENO, NEVADA PUBLIC HEARING TESTIMONY

Bob Warren, Executive Secretary, Nevada Mining Association

T4-1 On Page S-2, the summary of planning issues, I noticed that the -- And this has become a trend now with all of the environmental impact statements. BLM is not stating one of the Basic Criteria for qualification of the wilderness area. BLM is leaving out the reference that an area must be roadless. That is the number one criteria; therefore, you can't plan, and have resource management issues, without recognizing the most important issue: whether or not an area has wilderness suitability, because it qualifies as a roadless area.

T4-2 On Page S-4, discussing the economic development alternative, again we're emphasizing the production of commodity values, and the economic development alternative. The report has failed to recognize the most important commodity that may be available for management and production, a resource that is far greater in terms of employment, and generating the kinds of dollards that increase the quality of life for these people in these areas. Of course, I'm talking about production of minerals. You can't simply talk about economic development alternatives without recognizing the need for production of minerals.

T4-3 On Page 1-4, criteria includes renewable resources only. Here you are giving attention to all of these criteria upon which you're selecting the preferred alternative. Again, you have overlooked the most important criteria in some of the areas, to some of the communities. That, again, is the criteria of the potential for mineral development.

T4-4 On Page 1-4, again, it states that special attention will be given to social economic impacts upon local communities. Then, in the very last section on 4-19, you point out that there is no significant -- These wilderness designations will have no significant impact upon the economy of the area. It's obvious that if the areas that are dependent upon mining, as properly indicated, are not permitted to enjoy the fruits of future mining in theses areas, there will be a major economic impact.

T4-5 The Nevada Mining Association has contracted with three professors at the University of Nevada in the Department of Economics who have done a study of the economic impact of the mining industry in Nevada. They have updated, and given you much more useable data. Yours is largely limited to 1980, in many respects. Some of this is as recent as 1982. It shows the impacts.

T4-6 Another general statement -- On Page 315, and several pages following there. I used to complain about the fact that there were a lot of roads in these areas. I noticed this EIS is calling most of them "ways" now, only indicating that there are a few roads where it's so obvious that is the only way to avoid that..... And, also, a way maintained solely by the passage of vehicles, the BLM states that this is not a road. But the Interior Board of Land Appeals has ruled that this is a road; and very clearly, that this is a road, and there is no reason to go out and maintain a road by any other means if driving over it does it.

Barbara Kelly

T5-1 I don't support the preferred resource plan as it's formulated right now. I'd like to see a couple of changes in it. One of them would be to include part of the Simpson Park Range, the south end especially, which still has really good wilderness values.

Dave Hornbeck

T6-1 I generally support the designation of the two areas that you have indicated that would be included; that is, the Antelope and the Roberts Mountains. I, too, think though that you should include Simpson Park. I have not been in that area on foot, but I have viewed it from the air; and it appears to me to be a magnificent area, especially with some of the forest that exists on it. And I was looking through the technicial report, trying to determine exactly what basis you used for eliminating it.

T6-1 One thing I think that is a mistake in the approach the BLM uses to analyzing these wilderness study area, in terms of whether or not there's a conflict with mineral potential, is that ..... Through the inventory process and everything else, you've winnowed these down to a few areas that meet the wilderness criteria, and are in fact wilderness areas. You call them "wilderness study areas." Then you compare the conflicts with mining and mining potential solely within the wilderness potential boundary..... I think what you should be doing is taking the geo studies, and so forth, for the whole state. Take the percentage that the wilderness study areas would represent out of the entire area that is available for mining in this state, and I'm sure that you would find that that is an extremely small percentage of all of the area that is available for mining in this state....

If it has a very minor impact on all of the mining area, its values should therefore be preserved in relationship to the very small amount of impact it has on the mining area. Therefore, I do find fault with the fact that you have chosen to eliminate the Simpson Park area, because from the opportunities I've had to see that area, I think that it does represent an outstanding area of wilderness. I would encourage you to reconsider that decision, with an eye toward including at least the major central areas of that area in a wilderness recommendation.

Amy Mizza

T7-1 I support the BLM's analysis, with the addition of roughly the southern half of the Simpson Park WSA ... It is in a natural state, roughly six times the requisite size, and has dissected terrain and pinyon juniper forests offering the opportunity for solitude. It is no narrower than the narrow portions of the Roberts WSA, which are entirely adequate.

Roger Scholl, Wilderness Committee Chairman, Toiyabe Chapter of the Sierra Club

T8-1 Lastly, we urge that the BLM reconsider the southern portion of the Simpson Park WSA. I, and other club members, have flown this area and driven some of the boundary. We find it quite rugged and scenic. The BLM's analysis shows that most of the conflicts with mining activity are in the north end of the unit. These conflicts could be largely eliminated by drawing a wilderness boundary from, for example, Underwood Canyon into Shagnasty Basin, while not totally eliminating the wilderness resource in the WSA. We believe the southern two-thirds of the area is sufficiently large, rugged, and heavily wooded, especially in the southwest, to be manageable as wilderness.

Testimony

Claude Hunter

T9-1 I have one other problem with the BLM report, and that is a concern with the cultural artifacts that are involved in your Table 3-4. It indicates that some sort of projection is made by so many artifacts per mile. Then, therefore, there would be 60,709 sites that would have to be investigated to see what their archaeological values are. I'm familar with some of the areas out in Smoky Valley that were indicated as being archaeologically sensitive sites. I know for a fact that many of them that have been projected are not sites, never were sites, and have no archaeological values. On the projection here, in Class One and Class Two surveys, there are 850 sites that have been investigated. If there's 60,000 to go, that would mean it would take 70-some-odd years to investigate these sites. Does that mean that you retain a no use of this area, no chance of a plan, no chance of grazing, no chance of sale, because these sites haven't been investigated? Certainly, there must be some better, more scientific way of determining what are viable archaeological sites, and the ones that have been used, that I've witnessed, in the Smoky Valley Area.

Marjorie Still, Conservation Chair,
Tuiyabe Chapter of the Sierra Club.

T10-1 The preferred alternative has some confusing places in it -- At least confusing to me. For example, land disposal. In one section of the draft document, the statement is made that there are 104,959 acres under the preferred alternative from which lands could be selected from sale. On the chart, which compares the various alternatives, 58,440 acres is given for the preferred alternative for land disposal.

RESPONSES TO COMMENTS

1-1 The beneficial impact to the livestock industry is derived solely from the increased animal unit months available to be grazed by livestock as a result of all management actions combined. As discussed on 4-44 and 4-45 increases in available forage for livestock would result from increased understory production following woodland harvest, wild horse reductions, allotment management plan implementation, and vegetation manipulation. Decreases in available forage would result from land disposal. The increase of 39,782 animal unit months has been projected above the five-year average use level and not above the active preference use level. Permittees would be allowed to activate grazing use up to active preference upon request and monitoring data would determine if that level of use could be maintained.

5-1 Recommending the southern portion of the Simpson Park wilderness study area as suitable for wilderness designation was considerd during the study process. However, because the area lacks outstanding wilderness values on its own and because of manageability problems, it did not seem feasible to recommend the area for wilderness designation. Criterion number 2 of the Wilderness Study Policy states that "the area must be capable of being effectively managed to preserve its wilderness character." Private inholdings which the owner is reluctant to dispose of, private land with potential for development on the periphery of the unit, numerous roads and ways, and a boundary located on the 7,000 foot contour line would have the cumulative effect of making the South Simpson Park area unmanageable as wilderness in the long term.

5-2 The areas indicated on the maps identify a pool of land which meet preliminary disposal criteria within the parameters of the RMP process. Lands identified for disposal are not restricted to small isolated tracts; however, all identified tracts meet criteria outlined in Section 203 of the Federal Land Policy and Management Act. This RMP is not a final decision to offer land for sale, but an indication that, based upon the data contained in the planning documents, the land meets the disposal criteria. Specific areas to be disposed, size of tracts, method of disposal, or timing of disposal are not known at this time; these specifics will be determined as the plan is implemented and for each disposal action. At that time further analysis, including environmental assessment and public and local government input, will be conducted. If, based on that analysis, a decision is made to dispose of land, a classification decision or a Notice of Realty Action will be published with a right of protest for that specific action. All disposals would be done according to existing laws, regulations, and policies.

6-1 During the issue identification phase of the planning effort, surface or ground water was not identified either by the public or BLM as an issue to be addressed in the Resource Management Plan. Following is a brief discussion of the water regime in the resource area:

Surface water occurs in the resource area as perennial and intermittent streams, seeps, and springs. Most of the hydrographic basins in the resource area are topographically closed basins. In most cases no surface water exchange occurs between these basins. During spring runoff, the Reese River may flow through three basins and drain into the Humboldt River, and Henderson and Denay Creek may flow into Pine Creek which flows into the Humboldt River. Most of the year, the lower reaches of the Reese River, Henderson Creek, and Denay Creek are dry.

Typically, perennial and intermittent streams originate in the mountains and terminate on the alluvial fans. Perennial streams rely on springs and bank seepage for maintained flow rather than surface runoff. Almost all perennial flow within the resource area is allocated to users that have vested or certified water rights.

Ground water is generally available in all hydrographic basins in the resource area. Wells range from flowing to 500 feet deep. For most of the resource area there are no problems with ground water overdraft. Eight basins in the resource area have been designated by the Nevada state water engineer. A designation means that a permit must be obtained from the state water engineer before a well can be drilled within the basin. This has little impact on stock water wells.

No actions taken by the Bureau in any of the alternatives will impact the water availability for current users. Wilderness designation, woodlands management, and utility corridors have no impact on water availability. Land can be disposed for agricultural purposes only if certified water rights have been obtained from the Nevada state water engineer. It is the responsibility of the state water engineer to determine impacts of additional ground water pumping.

Developing water for livestock, wild horse, and wildlife use will not impact water availability to current users. Stock water wells pump at a rate of 5 to 15 gallons per minute and would have no impact on ground water availability. Spring developments are diversion of available water but do not impact the amount of available water. Stream and riparian habitat protection and improvement would have no impact on the water available to users.

6-2 The term "human imprints" has been added to the glossary. See Revisions and Errata Section.

6-3 Standard operating procedure Number 14 has been changed as recommended, see page 24.

6-4 Impacts on water availability from disposal of land for agricultural purposes has been discussed in the response to 6-1. It is possible that commercial and industrial development will take place on disposed federal land. It is the responsibility of the Nevada state water engineer to determine the allocation of surface and ground water and the impacts of additional water use. There is sufficient water available for any predicted community expansion. No ecosystems will be impacted by additional water use in any areas identified for disposal in any of the alternatives.

7-1 The southernmost boundary of the Antelope unit currently does follow a very rugged jeep trail. The trail immediately north of the boundary, the one referred to, is noticeable but hardly passable. Designating this trail as the southern boundary would not improve manageability or access.

7-2 Using this southern way as a boundary line was considered in earlier analysis but it was felt that reducing the size of the area more than it is now would reduce the wilderness characteristics of the study area. The ares between the way and the fence is very rugged. A boundary line between these two points would be difficult to describe and recognize on the ground.

7-3 The BLM Wilderness Management Policy provides for continued use of a valid existing right. The policy also identifies the specific guidelines which will be used in developing a Wilderness Management Plan for each BLM-administered wilderness area. These detailed plans will include decisions to allow or disallow motor vehicle use and activities in accordance with the policy.

7-4 In general legal access to public land is not a problem in the Shoshone-Eureka Resource Area. During the scoping process legal access was identified as a potential issue but was dropped due to the fact it is not a significant problem at this time. To prevent it becoming a problem in the future, rights-of-way for public access would be reserved on all public lands transferred to private ownership (see standard operating procedure Number 28, p. 25).

7-5 There is only minimal recreational significance to the resource areas hot springs. Since recreational use of these areas is so small, they were not evaluated in the RMP/EIS. Most areas are on private land. Only one area, Spencer Hot Springs, is semi-developed and available for public use.

8-1 Professionals outside the Bureau of Land Management were not consulted during the determination of ecological condition and vegetation trend. The estimates of ecological condition and vegetation trend used in the document were, as stated on page 3-8 and again at the bottom of Table 3-3, based solely on the professional judgement of the Shoshone-Eureka Resource Area staff. As indicated in the Draft RMP these estimates were developed for analysis purposes only.

8-2 The resource area staff relied on their professional experience and in-field observations of individual allotments to estimate vegetation trend. Reference was made to the concepts and guidelines identified in the Nevada Range Studies Task Group procedures and the Forest Service and BLM trend approaches in estimating trend. No specific parameters were developed other than these references.

8-3 Members of the staff have all met civil service requirements for the range positions they hold. All have bachelors degrees in range or related fields and all have greater than three years of professional experience within the resource area.

8-4 As noted on page 3-2 of the Draft RMP/EIS studies to determine habitat condition have not been established. Also as noted on page 3-2 habitat condition in the resource area was estimated based on professional judgement of BLM wildlife biologists and Nevada Department of wildlife's game management agents who work in the area.

Parameters that are considered in determining habitat condition include forage quantity, quality (in terms of wildlife use) and diversity; amount of cover; water distribution; and extent of disturbance or conflicts from such things as roads, mining activity, etc. These parameters are not necessarily related to site potential. The ecological condition classes imply a connotation of value, i.e., good, fair, poor, for an area. This may not always be an appropriate interpretation since it is based upon a comparison to some potential or ideal vegetation composition without considering such factors as existing or proposed uses and management practices.

Often it is assumed that it is best to manage the range for the highest ecological condition possible. This, however, is not always the case. The vegetation composition best suited to particular needs may occur in lower ecological condition classes. For instance, if resource and management needs (i.e., maximum vegetation cover for soil stability, or the highest percentage of palatable forage for livestock, deer, and/or wild horse, etc.,) can be met in a particular area by fair (mid seral) ecological condition, it may be much more practical and feasible, perhaps due to limited or deteriorited site potential to manage for that condition rather than good or excellent ecological condition.

8-5 As stated in Appendix C of the Draft RMP/EIS, streams surveys conducted in 1979 measured several parameters rating instream as well as bank and streamside conditions. Two parameters measuring stream bank cover and stream bank stability were used to evaluate riparian condition. It is felt that these two measurements gave an overall picture of near streamside vegetation condition. The other parameters, pool-riffle ratio, pool quality, and stream bottom material, were not used to rate riparian condition.

8-6 See response 8-5

Livestock grazing along stream banks can influen e pool-riffle ratio and pool quality. Erosion resulting from trampled stream banks can increase sediment loading in both pools and riffles and damage stream channel morphology (Gallezioli, 1977, cited in Platts and Meehan, 1977).

8-7 Before any stream rehabilitation project is undertaken, the stream will be thoroughly evaluated regarding its present condition and its potential. If there is no potential for improvement, it would not be cost effective to initiate such a project.

The stream surveys conducted in 1979 did not account for potential of either the aquatic habitat or riparian habitat. Any stream proposed for improvement would be evaluated, in cooperation with the livestock permittee and other interested parties, according to its present condition, trend, potential, desired objectives, best means to achieve objectives given, and other uses of the area. This evaluation would be on a case-by-case basis as stream and riparian improvement projects are implemented.

8-8 Riparian condition is essentially synonymous with ecological condition. However, riparian condition also implies a determination or measure of a riparian areas suitability as wildlife habitat. In general, the better the ecological of a riparian area, the better it is for wildlife habitat. Natural factors such as the amount and velocity of stream flow as well as time interval between high water flows can affect the streamside riparian zone and will largely determine the potential of that riparian zone. In some cases these factors do have a significant influence on a streamside riparian condition. However, when the understory of a riparian zone has been completely grazed out, where there is little or no tree regeneration, where stream banks have been heavily trampled and water sources polluted, it is reasonable to attribute the majority of the damage to livestock grazing. In the wildlife habitat inventories conducted in the resource area, this was found to be the case in most instances (USDI, BLM, 1982):

See also response 8-4

8-9 The No Action alternative is required by NEPA to provide a full range of alternatives. It is considered both by regulation and by policy to be a reasonable alternative. As portrayed in the Draft RMP/EIS it represents a frozen point in time for analysis purposes and provides a baseline for measurement of impacts under the other alternatives. If the No Action alternative were chosen as the Preferred alternative, it does not mean that management actions in the resource area would be frozen, but rather that management would be on a day-to-day basis with no long term management program for any resource use.

8-10 It is not the intent of the resource management plan to continue past or present management, unless the No Action alternative were chosen. At what level horses can be maintained will depend on the alternative chosen and on funding and availability of personnel. As noted on page 4-2 of the draft RMP/EIS it is assumed that the district would have money and manpower to implement the Preferred alternative.

8-11 It is recognized that mule deer populations do fluctuate over time and could increase or decrease in the future if present management were continued. However, for analysis purposes it was assumed that deer numbers would not change under the No Action alternative. The same assumption was made for livestock and wild horses. This is in keeping with the overall premise of the No Action alternative. See also response to comment 8-12.

8-12 No Action as addressed in the Draft RMP/EIS means to continue existing management as it is with no significant changes taking place. In other words the situation is frozen in time. By definition then, and for consistency in analysis, no new AMPs or significant change in range improvements or management, etc. would be planned or scheduled in this alternative.

See also response 8-9.

8-13 See response 8-12

8-14 See response 8-12

8-15 The specific criteria for classification of allotments into the M-I-C categories are shown in Appendix A of the Draft RMP/EIS and include an economic and manpower constraint criteria. Selective Management and reference to Appendix A are discussed on 2-33 and 2-34 and 1-5. The discussion on 1-5 was meant to be an introduction to the concept of selective management and as such was minus some of the detail included in later discussions, e.g., Appendix A.

8-16 As you are aware, the M-I-C selective management criteria for the Shoshone-Eureka Resource Area were developed at the district level in coordination, consultation, and cooperation with local publics,

approved by the State Director, and then made available to the public. The criteria in Appendix A are a product of local public input and BLM policy and include a funding and manpower criterion, that did in some cases, overide the other criteria placing potentia I allotments into the C category. Consequently some C allotments could be expected to have season-of-use, etc. changes needed. Also, it should be noted that the category an allotment is placed in is the product of 10 criteria. In many instances an allotment could fall into a C category even though 2 or 3 criteria out of 10 would have placed the allotment into the M or I category. Additionally, the category an allotment falls in can be modified to place a high priority C allotment for example, into an I category at a later date.

8-17 As noted on page 2-32 of the Draft RMP/EIS exclosure fencing of riparian and aquatic areas is one method that could be used in a habitat improvement project. Whether to use fencing or some other method would be considered on an individual basis for each stream or riparian area and would be done in cooperation and consultation with the livestock permittee and all interested parties.

The reference on page 4-10 and subsequent pages to the loss of livestock grazing capacity during riparian and aquatic habitat improvement is a worst case analysis of impacts that would occur should all areas be fenced. This is not to imply that the decision has been made to fence any particular site.

8-18 See response 8-17

8-19 The BLM would be responsible for maintenance of any habitat improvement project, including fencing, unless the Nevada Department of Wildlife or the operator(s) using the allotment would agree to maintain the project.

While fencing riparian areas may interfere to some extent with large animals, such as mule deer, using the areas, the overall benefits normally gained by wildlife would more than offset the liabilities. Benefits that would be gained include reduced competition for forage, better cover from increased amount of grass, trees, and shrubs; and improved aquatic habitat resulting from an increase in bank vegetation, more stable stream channel, and reduced erosion. Of the species using the riparian zones, the non-game species, particulary birds and small mammals, would benefit most.

The BLM is not contemplating any outright reductions. Any reductions would be done as outlined in the Draft RMP/EIS, i.e., based on monitoring and through consultation, cooperation, and coordination.

8-20 Almost all range uses have some impact on the vegetation, be it beneficial or adverse. Wild horses do contribute to those impacts in some areas.

8-21 Any increase in horse numbers would be allowed only after monitoring data showed that the range could support such an increase.

8-22 The numbers of wild horses based on 1982 surveys were used for analysis purposes. Whether or not animals can be maintained at this level will depend largely upon funding, manpower, and priorities within the state for horse removals. Wild horse numbers may be changed whenever sufficient monitoring data is available to show the need for a change, or whenever an agreement on wild horse numbers can be reached through consultation and coordination with all parties concerned.

8-23 See response 8-21

8-24 The improvement in range condition refers to an improvement in ecological condition which does not necessarily correlate to an improvement in wildlife habitat condition.

See also response 8-4.

8-25 See response 8-12

8-26 Based upon utilization data for a number of allotments, existing use meets or exceeds proper use levels under current authorized use which, in many cases, is below active preference. If utilization levels meet or exceed proper use levels at existing use, we feel it is reasonable to indicate that current productivity may be less than it was when preference levels were determined for some specific areas.

8-27 Yes, the five-year average licensed use is for analysis purposes only. As indicated in the regulations, a permittee can activate his non-use at any time unless cases of emergency (military defense requirements in time of war, natural disasters, national emergency needs, etc.) preclude it. Paragraph 1 under short-term managment actions on page 13 has been changed to clarify this point. There is no basis at this time to hold a permittee to the past five-year average active use, as this could be a reduction in preference and would require a district manager's decision. Determination of livestock grazing capacity will be based upon monitoring data as indicated on page 1-5 and 2-34 of the Draft RMP.

8-28 The analysis of potential economic impacts which might occur in the affected area is necessarily time specific and must be based on data which identifies and describes the interrelationships which exist within the framework of a specific economic community at a point in time. At the time this analysis was conducted, the best available income and employment data for Eureka and Lander counties described the economic community for the base year 1980.

The typical ranch budgets utilized in the analysis reflect purchase costs and selling prices representative of a 1978 through August,

1980 average, and were considered to be appropriate for application to the base year (1980) community economic data.

While it is recognized that three-year average prices may or may not be reasonable, depending on the state of the cattle cycle and the expected rate of inflation, such price and cost averages are widely considered to be a fair estimate of an expected average over the next several years.

BLM grazing fees of $2.36 per AUM were not adjusted because they were appropriate to the base year economic data and were considered to be reflective of the relative production cost relationships at that time. Grazing fees for BLM administered land are set by legislative formula which requires annual adjustment with reference to the price of beef and costs of production.

8-29 The market value of grazing permits, which is capitalized for use as loan colateral or for the sale of base property, reflect the additional capacity that public land grazing allotments provide and is a result of grazing fees that have historically been less than market value. Thie view is generally held in the professional literature, not only in the studies referred to in the draft RMP text, but also in:

Godfrey, E. Bruce, "Measuring the Economic Impact of Agency Programs on Users and Local Communities." Paper prepared for Workshop on Applying Socio-Economic Techniques to Range Management Decision Making, National Academy of Science, Boise, Idaho, May 1981.

McConnen, R.J., "Public Land Grazing and Ranch Economics." Staff Paper 76-10, Department of Agricultural Economics, Montana State University, Bozeman, Montana, 1976.

Gardner, B. Delworth, "Misallocation in Grazing Public Range." Journal of Farm Economics, 1962. 44(1): 50-63.

8-30 The economic analysis of activity plans, or AMPs which are designed to achieve particular goals, is not an appropriate inclusion in RMP/EISs, which deal with important qualitative considerations.

Cost-benefit evaluation will be included as part of the analysis in the planning and implementation of the RMP decisions in the activity plans for individual allotments. At that time, present and future costs and benefits, both public and private, will be discounted to the base year in order to provide for an assessment of economic efficiency. Permittees are not compelled to provide range improvment investments or maintenance for projects which they do not find economically advantageous.

10-1 See response 5-1

10-2 Demand for woodland products from the Resource Area is not limited to the people living within the boundaries of the resource area. The Shoshone-Eureka Resource Area also supplies people from outlying areas with woodland products. This includes Fallon, Winnemucca, Elko, portions of Idaho, Utah, and California. Most of the demand from the outlying areas is of the commercial, larger scale type. Two thousand cords of fuelwood and 2,100 Christmas trees as proposed in the Environmental Protection alternative, would only be sufficient if commercial use of the woodland areas was prohibited.

Six thousand juniper posts are currently being used annually by local ranchers for fence and corral construction. This amount is expected to remain somewhat constant over the next several years.

10-3 See response 5-2

The primary statutory authority for land disposal is the Federal Land Policy and Managment Act (FLPMA). Under Section 206 of FLPMA, lands may be exchanged when it is determined that the public values of the lands to be acquired exceed the public values of the lands to be conveyed. There is no specific statutory requirement that lands suitable for exchange be identified as such in a land use plan. If lands have been identified for "disposal" in a plan, the method of disposal (sale, R&PP, exchange, etc.) would depend on the opportunities and policy in effect at the time of disposal.

11-1 During the short term, five "improve" category allotments would receive allotment management plans. They are Buffalo Valley, Diamond Springs, Roberts Mountain, Tierney Creek, and Clear Creek. The initial increase of 3 percent occurs throughout the short term, effectively being achieved by the end of the short term, as a result of AMPs and seedings implemented on the five allotments. Additional grazing systems would be developed and implemented during the activity planning process and would involve consultation, coordination, and cooperation with the livestock operators and other affected interests. Since the activity planning process follows, or comes after the RMP we cannot say exactly what treatments would be used.

Table A-1 in the Revisions and Errata Section lists the Maintain category allotments and the grazing systems established on them. Systems similar to these and involving many of the same grazing treatments, would be implemented on the "I" allotments.

The Draft RMP/EIS summarizes cumulative affects of AMP development and management actions. When activity plans are prepared in consulation with operators, etc, an EA would be prepared to determine whether implementing the activity plan would result in impacts not addressed in the RMP/EIS.

11-2 The Nevada Department of Wildlife is and will be involved in habitat monitoring by assisting in selecting locations for study plots, assisting in analyzing data, providing actual use information (numbers of animals using an area) and so forth.

Winter population numbers of mule deer are not available for the resource area as a whole.

The impacts of all potential land disposal to crucial wildlife habitat were analyzed under each alternative. Only the one involving the loss of 11 percent of one winter range was significant.

11-3 The initial level of use at the start of the implementation period is 239,317 AUMs. Through implementation of AMPs and projects, it is anticipated that monitoring will show the availability of the 7,216 AUMs by the end of the short term. Increases as a result of allotment management plan implementation and project development were estimated to be 10 percent above the five-year average for the allotments. This figure is a projection based on a review of the literature by Van Poollen and Lacey (1979) and was used for analysis purposes only. Any adjustments in livestock use will be based upon monitoring studies.

11-4 In some instances, such as where pastures are unfenced and water is used to control livestock distribution or where the livestock permittee is required at his/her own time and expense to maintain water in a trough, it may not be feasible to maintain water for wildlife in rested pastures. If however, the pasture is fenced or a separate water inaccessible to livestock is available to wildlife, it would be feasible to maintain water in rested pastures.

11-5 In almost all cases wildlife habitat improvement is a major consideration in woodland harvest projects. Wildlife stipulations are developed on a case-by-case basis for each area depending on habitat improvement objectives as well as woodland management objectives for that area.

We have no general stipulations for wildlife applied as standard operating procedures.

11-6 See response 11-3 for additional information.

The 7,216 AUM increase is projected based on the AMPs, seedings, and other projects that are implemented throughout the five-year period. No forage allocation has been proposed or implied in the Draft RMP/EIS.

The increases projected are solely the result of expected increases due to management actions. All increases would only be authorized following monitoring data showing that the forage is available.

11-7 The 33 percent increase in hunter days under the Preferred alternative is based on projections of big game animals reaching reasonable numbers (33 percent increase over present numbers) and upland game increasing in the long term. These increases would result from habitat improvement projects as well as range improvements and grazing systems. Chapter 2 details those projects that would be implemented in the short term. Similar projects and activity plans would be carried out in the long term which would result in increases of game animals over the long term.

12-1 The response to number 6-1 discusses the general hydrologic regime of the resource area and impacts on water availability.

Ground water quality information is available for most of the resource area. Analysis of the information indicates that the ground water is good and suitable for most beneficial uses. It is reasonable to assume that the ground water quality is equally good in areas where information is not available. No actions proposed in any of the alternative would impact ground water quality.

Surface water quality data for the resource area has been collected by the Bureau of Land Managment since 1977. Analysis of the data showed that water quality is good overall but that quality standards were exceeded at a few sampling sites for a small number of parameters sampled. Specific information for specific sties is available in the district files.

14-1 See response 5-2 and 10-3

Should opportunities for exchanges arise, important wildlife habitats, such as riparian areas, would be highly favored for aquisition.

14-2 See responses 11-1 and 11-6

14-3 The amount of riparian and aquatic habitat projected to be improved in the RMP was based on estimated funding levels for project development in the wildlife habitat management program during the life of the plan. The funding estimate was based on the last 4 years average funding for the program in the district. The areas identified for improvement are a realistic estimate of what could be done within this projected funding level. Some areas where project improvement would be implemented are in poor condition at the present time. However, areas presently in fair or good condition on which no action is taken would remain stable or decline with some going to poor condition. Therefore, although some areas in poor condition may improve, the net change may be relatively small as in the case of aquatic habitat under the Preferred alternative. It should also be noted that the amount of aquatic habitat in good condition would significantly increase under this alternative.

14-4 Selected riparian areas are those which meet the following criteria: a) are in less than good condition; b) have potential for improvement; c) are in an area covered by an activity plan such as HMP or AMP. Since in most cases it would not be possible to improve all riparian habitat within an activity plan area, actual areas to be improved would be determined at the time the activity plan is developed and would depend to a large extent on funding availability and other resource uses of the area.

14-5 The proposed criteria were presented to the public during three informal workshops held in Battle Mountain, Austin, and Eureka. These workshops were not associated with the CRMP process. The assistance of a CMRP committee is normally solicited during the implementaiton phase of the planning process. Activity plans, particularly AMPs, would be developed with the assistance of a CRMP committee.

14-6 Sound forestry and conservation practices are set forth by the Nevada State Board of Forestry as the "Standard Forest Practice Rules."

14-7 Although intensive management systems would not be implemented on the custodial allotments, some degree of management would occur with objectives identified and specific monitoring studies established to ensure protection of existing resource values. Declining trend would be stabilized by adjusting grazing use to meet the carrying capacity of the range.

14-8 Standard operating procedure number 16 has been changed to reflect the legal requirement. Therefore, water will be made available to wildlife at developed springs and seeps whether the pasture is being rested or not.

See also response 11-4

14-9 Soil erosion conditions have not been inventoried in detail for the Shoshone-Eureka area. While there is a possibility that there is a potential for high erosion rates due to slope, soil type, and vegetative cover, the actual erosion rate is estimated to be low. An erosion rate of .5 tons per acre per year is a generally acceptable level for most of the resource area. Resource area-wide estimates for erosion rates are below this level due to the low runoff for most of the area. Average yearly runoff ranges from less than .1 inch for most of the resource area to a maximum of 10 inches at higher elevations.

Any activity that increases or decreases the vegetaive cover at a site will have an impact on the potential or actual soil erosion at that site. Although the impact at the site can be significant, the impact on the soil overall will be insignificant. The only management action which could potentially affect soil significantly is livestock management. However, the proposed changes in livestock management for all the alternatives is insufficient to cause significant impact on soil.

Water quality data analysis shows that turbidity and sediment in streams is high only during spring or storm runoff. At normal and low flow periods, the turbidity and suspended sediment are at acceptable levels for most streams. The analysis also showed that turbidity and suspended sediment varied little with stream condition. Since the proposed actions do not specify what action will be taken to protect or improve the stream or what percent of the total length will be affected it is impossible to predict the impacts of these actions on water quality and channel erosion. If only a portion of the stream is protected (diversions excluded), then no beneficial impacts will be expected.

15-1 Tables A-2 and A-3 in the Final RMP/EIS have been prepared which show specific data by grazing allotment. The information in the Draft RMP/EIS summarizes the existing situation data as well as the cumulative effects anticipated after activity plans are implemented. The tables are provided as supportive data to the resource conflict area summarization in the draft.

15-2 The existing range survey data consists of a 1955-1965 ocular reconnaissance range survey which was used as baseline production data for allotment adjudication carried out between 1961-1966 for the resource area. This data was collected, analyzed, and used to set grazing capacity approximately 20 years ago and due to numerous changes in management practices and weather fluctuations since that time additional monitoring data is required to make adjustments to the current situation. Additionally, past monitoring data is not sufficient to adequately evaluate current or future management systems as it does not meet the Nevada Range Studies Task Group recommendations or current BLM policy standards. The RMP will identify current monitoring studies and management practices as well as future management and monitoring studies required to meet the objectives identified for the allotment.

15-3 Land use planning objectives are broad in scope to resolve area-wide conflicts of land use. Program specific management will be developed during the activity planning stage and will include specifics on grazing systems and treatments designed to solve allotment-wide problems. Grazing systems and allotment management plans will be developed in consultation, coordination, and cooperation with the permittees and interested publics through the Coordinated Resource Management and Planning process. Although the specific systems have not been analyzed in detail in the RMP, the impacts of grazing systems have been analyzed, specifically, an improvement in ecological condition and an increase in available forage. Individual systems which will bring about these changes will be similar in design to those systems described for the "maintain" category allotments in response 11-1.

Similarly, specific range improvement analysis is not within the scope of the land use plan. Range improvements required as part of grazing systems will be addressed during the activity planning stage and will include an environmental assessment for all projects.

15-4 We feel the RMP has addressed a range of management practices. A different array of management actions were considered in each alternative and result in different levels of use for livestock, wildlife, and wild horses. As discussed above, specific systems will be tailored to individual allotments and individual resource problems.

The projected utilization level referred to in the Draft RMP is an acceptable target for allotments under year long use and is within the guidelines identified in the 1981 Nevada Range Studies Task Group monitoring recommendations. On allotments receiving intensive grazing systems allowable utilization levels would vary by treatment and season-of-use within the framework of the allotment management plan and would involve CRMP input and recommendation.

15-5 Licensed use as a result of short term livestock actions and actions of other resource programs as shown on page 2-9, Table 2-2, refers to the cumulative effects of all management actions listed on 2-13 and 2-14 and discussed on pages 4-8, 4-9, 4-10, and 4-11 of the Draft RMP/EIS. This level of use is 7,216 AUMs above the "initial level of use" which is, as stated on page 2-9, Table 2-2, the five-year average licensed use level which is the starting level for analysis purposes in all alternatives. The "initial adjustment" shown on page 2-16, Table 2-3, as per the footnotes referenced, is the adjustment to the 5-year average licensed use as a result of implementation of grazing treatments to provide spring rest as discussed under number 6 on page 2-20 and again on page 4-28.

15-6 As noted on page 2-1 of the Draft RMP/EIS, a "No Grazing" alternative was considered initially and later dropped. A "No Grazing" alternative is not necessary nor required for the following reasons:

1. A "No Grazing" alternative is not required by NEPA. Section 102 specifies only that there be alternatives to the proposed action and that such alternatives be appropriate.

2. The Taylor Grazing Act of 1934 recognized domestic livestock use on public lands and set up procedures to authorize and regulate that use. Therefore, alternatives should not seek to eliminate this recognized use but discuss alternatives that continue to recognize and regulate livestock use.

3. Section 103 of the Federal Land Policy and Management Act of 1976 includes livestock grazing in the definition of principal or major uses of public lands. Section 202 states that any managment decision that excludes one of the principal or major uses is subject to reconsideration, modification, and termination by the Secretary of the Interior. Section 202 also requires Congressional review of decisions that totally eliminate one or more of the major uses.

4. Since livestock have existed on public lands in the resource area for over 100 years, the "No Grazing" alternative does not provide a baseline as it would be very difficult to accurately describe resource conditions 100 years ago.

Council on Environmental Quality regulations on the implementation of NEPA, 1502.14(a) specify evaluation of all reasonable alternatives. For the reasons cited above and for those given on page 2-1, it was felt that for the purposes of this RMP/EIS "No Grazing" was not a reasonable alternative.

15-7 See responses 12-1 and 14-9

15-8 Herbicide spraying is mentioned in the RMP as one potential means, along with prescribed burning, chaining, plowing, etc., for converting vegetation types. Specific impacts of any of these methods were not discussed since the actual location, extent and method of type conversion are not yet determined. When a specific vegetation manipulation project is proposed, all potentially suitable methods including herbicide spraying will be analyzed in a site specific environmental assessment. This analysis will comply with NEPA requirements and will be in keeping with Department of the Interior manual and policy guidance concerning the use of herbicides.

15-9 Showing both a reduction and an increase in livestock grazing as a significant benefit in Table S-1 was a typographicl error. The 15 percent reduction would be a significant adverse impact to livestock grazing and the 17 percent increase would be a significant benefit. Table S-1 has been changed accordingly.

15-10 See response 8-16

Allotment categorization criteria were appled to all allotments and the allotments are listed by selective management category in Appendix A.

16-1 The text has been changed as recommended. See pages 11 and 28.

16-2 The letter designation for the loop around the Hickison Recreation Site is clarified by designating the north route as W-J north and the south route as W-J south. Changes in the text have been made accordingly. The BLM agrees to adopt a 3/4 mile corridor south of the existing 230 kV transmission line from point W to J and then west to the Forest Service boundary. This is to ensure consistenacy between the federal agencies.

The wording to exclude sage grouse strutting grounds from the corridor route is deleted. Strutting grounds in the area would not be affected by corridor designation. Impacts to sage grouse would be determined through environmental assessments of individual projects and appropriate mitigation measures taken at that time.

The term Devil's Gate refers to that area immediately adjacent to Highway 50. The area encompassed by the "Devils Gate" visual resource management Class II area is almost entirely north of highway 50 and the existing 230 KV transmission line. As such, there are no conflicts with the proposed corridor designation through the area south of Devil's Gate.

16-3 The area encompassed by the "Ravenswood" visual resource management Class II area does not conflict with the proposed corridor O-R-K from Austin to Battle Mountain. Only the east slope of the Ravenswood Mountains are designated as Class II.

The proposed corridor route O-R-K would be restricted to the east side of Highway 305 only from the northern point of the "Narrows" south to Austin. (The "Narrows" is located 53 miles south of Battle Mountain and is the point where the Reese River and Highway 305 cuts through the Shoshone Mountains.) This has been clarified in the text. See Page 12.

16-4 The text has been changed as recommended, see page 19.

16-5 The Glossary has been changed as recommended except that the corridor width is limited to 3 miles for the purposes of this resource management plan. See Glossary section of the Errata and Revisions chapter.

16-6 The legend is changed as recommended. See Maps Section of the Revisions and Errata Chapter.

17-1 When the district began the issue identification step of the resource management plan, mineral development was considered to be one of the issues that obviously needed to be included because of its overall local and national importance. The decision was made, however, not to include minerals as a result of the following considerations:

The resource management plan is not intended to provide guidance for the management of all potential resource values (see page 2-38 of the Draft RMP/EIS). After carefully considering our minerals management situation, we decided that minerals in the resource area would best be managed outside the framework of the resource management plan. The mineral resource by its very nature is not suited for long term planning. New mineral locations are discovered every year and old ones become developable as a result of new technology or higher mineral prices. A plan that would determine whether mineral or non-mineral uses are the highest and best use of the public lands would quickly become out of date.

The 3802 and 3809 regulations provide a mechanism for resolving site specific conflicts between minerals and other resource uses. We believe that any attempt to plan for the use of minerals on an area by area basis would only result in unnecessary constraints upon the industry.

18-1 Of the existing allotment management plans, three are meeting their management objectives based upon evaluation. The four AMPs identified as being in the "I" category require revisions to the management systems in order to address existing resource concerns and meet management objectives.

Allotment management plans and grazing systems, intensive or custodial in nature, are still the primary tools available for improving resource and vegetation condition. Five AMPs have been proposed in the short term with an additional 10 for the long term. The number of AMPs the district has the ability to implement in the short and long term is heavily weighed by the funding and manpower capability criteria.

18-2 See response 8-16

18-3 CFR 1601.5-4(b) states that both of the following criteria must be met in order to consider a potential ACEC for nomination:

1. Relevance - There shall be present a historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard.

2. Importance - The above described value, resource, system, process or hazard shall be important. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness or cause for concern, especially when compared to any like or similar resources.

During the initial inventory phase, none of the areas recommended for ACEC nomination were found worthy for further consideration since they could not meet the criteria for importance. All recommended areas were considered only locally significant and were therefore dropped from further study.

18-4 Monitoring of allotments in the "M" and "C" category would involve initiating and reading the same types of studies required to monitor the "I" category allotments. The number of studies and frequency which they are read would be at a reduced level. The 1980 Nevada Range Studies Task Group procedures and the BLM 4410 studies manual and district supplements discuss all studies in detail. The goal of the monitoring program on "M" and "C" allotments as discussed in the Final Grazing Management Policy is to detect undesireable changes and protect existing resource values.

18-5 See response 15-5

19-1 See reponse 18-3

19-2 As stated on page 2-11 of the Draft RMP/EIS , the disposal of public lands would, among other things, meet the need "for the creation of blocked-ownership patterns which would result in improved land management." Thus, manageability of lands is a criterion for consideration of disposal. Under the Preferred alternative approximately 13,450 acres of checkerboard lands are identified as potentially suitable for disposal. In general these areas are below 5,000 feet elevation. Checkerboard lands above 5,000 feet elevation were felt to have greater value as wildlife habitat and have little potential for economic development other than mining which would proceed with the lands remaining in public ownership.

19-3 The standard operating procedure number 12 on page 2-36 of the Draft RMP/EIS refers to the construction of range improvements and the cooperative agreements between the Bureau and the permittees addres the maintenance responsibility for the projects. There is no inference made here to Cooperative Management Agreements.

19-4 Under the "Economic Development" alternative, wild horses would be reduced to the numbers and in those herd areas which existed at the time the Wild and Free-Roaming Horse and Burro Act was passed in 1971.

See also response 8-20.

19-5 The 391 miles of utility corridors proposed in the Economic Development alternative reflect the recommendations of the Western Regional Corridor Study. That study was put together to determine the possible utility and transporation corridor needs for the 11 western states through the end of the century. The Study showed a number of alternate corridor routes, totaling 391 miles through the resource area. These alternative routes would provide utility companies the greatest option in siting utility transmission lines, but would be more than the minimum necessary to meet industry needs. In discussions with representatives of Sierra Pacific Power Company it was determined that the 112 miles proposed in the Preferred alternative would be sufficient for industry needs in central Nevada for the next 20 years. As noted in the document, the Preferred alternative would establish a basic east-west, north-south network of utility corridors but delete the alternate routes of the Economic Development alternative.

Overly limited corridor designation could adversely affect the industrial and economic growth of the State, whereas overly generous designations would potentially conflict, and perhaps unnecessarily so, with a number of natural resource values.

19-6 See responses 5-2 and 10-3.

19-7 The reduction of wild horses in the Economic Development alternative and the increase of horses in the Resource Protection alternative provides a range of alternatives for analysis. Under the Economic Development alternative livestock forage would be maximized. Under the Resource Protection alternative livestock use would be reduced to benefit both horses and wildlife. Any increases in wild horse numbers would be allowed only after monitoring data showed that there was forage available and that such increases would not confict with wildlife use of an area.

19-8 The increase in hunter days is based on the projected increase for both big game and upland game. While it is well understood that there are a number of factors which influence hunter days, it was also felt that based on the projected increases of game animals and an increased human population over the next 20-years, a 33 percent increase in hunter days during that period of time is a reasonable estimate.

19-9 See response 18-3

9-10 The Bureau policy in Nevada on the collection and use of monitoring data for adjusting livestock use is:

1. Each resource area will develop a monitoring plan which will set or establish monitoring guidelines for the area.

2. Every allotment will have a multiple use montoring plan developed as part of an activity plan, an allotment management plan, a Coordinated Resource Management Program plan, or as a separate document. The monitoring plan will include but not be limited to the following information.

    a. Statement of issues
    b. Allotment management objectives
    c. Studies required and schedule to be followed for reading studies
    d. Evaluation and actions available if objectives are not being met.

See also responses 11-1 and 11-3

Also the paragraph on 1-5 has been changed to read "would be based" and "would be altered."

19-11 It was not the intent of the planning criteria to make a stronger management commitment to one resource over another. Wildlife and wild horses are treated with equal weight through-out the document. In all alternatives except No Action, there are specific proposals to protect and enhance wildlife habitat as well as maintain viable and healthy herds of wild horses.

19-12 The allotments you list were not placed in the "I" category when applying the selective management criteria. However, the selective management categorization process is a dynamic process in that as resource conditions change, additional data becomes available, and/or funding and manpower permits, the original category an allotment was placed in may change. The process on how the criteria were developed and applied is explained in response 8-16.

19-13 See responses 5-2 and 10-1

19-14 The proposed planning corridor O-R-K has no relationship to any on-the-ground situation at this time. As noted on page 2-31 of the Draft RMP/EIS, the corridor would be a point-to-point designation within a valley or broadly generalized route. The actual route would be determined after site-specific environmental analysis initiated by the first right-of-way application. Any conflicts with wildlife or other resource identified would be avoided or mitigated at that time.

19-15 All management actions involving woodland harvest would be coordinated with the area wildlife biologist to assure compatability with wildlife resource values.

See also response 11-5

19-16 Allotment management plans are not the only management systems that may be implemented. Intensity can vary from intensive AMP implementation on "I" allotments to custodially managed season-of-use changes on low priority allotments. The Selective Management Categorization process, through the evaluation of ten criteria, has identified those allotments with the most urgent resource and management problems. The finding and manpower constraint criteria, in some cases, placed a low priority "I" allotment into the "C" category. See response 8-16. Monitoring, implemented on all allotments, would identify the problem areas in some allotments, which could be remedied by implememtation of low intensity type management treatments, i.e., changes in numbers, season-of-use, duration of use, etc., to better meet the physiological requirements of the plants.

19-17 See response 18-4

19-18 See responses 10-3 and 14-1.

19-19 See response 18-4

19-20 Visual resource management procedures are designed to reduce impacts of projects on the scenic quality of the landscape. If a project has a visual contrast rating in excess of the recommended maximum for the visual class zone in which it is proposed, the impacts would be mitigated through relocating, redesigning or abandoning the project. Viaual quality rating is part of the overall environmental assessment done for each project.

19-21 Standard operating procedure number 16 has been changed to reflect the legal requirement. This standard operating procedure also states that spring sources will be fenced when developed.

19-22 The standard operating procedure has been rewritten, see page

19-23 It is bureau policy that following new vegetation manipulation projects, livestock grazing will be deferred for two growing seasons to allow seeded species to become established. However in some instances, where wild horses are present and a vegetation treatment is completed within a larger fenced pasture, the wild and free-roaming nature of the horses would not be impaired. The paragraph has been revised to read, "Livestock grazing, and wild horse use where practical."

19-24 The recommendation concerning crested wheat grass seedings is covered under standard operating procedure number 18.

Management strategies on deer winter ranges will be determined on a case-by-case basis at the time activity plans are developed.

Recommendations 3 and 4 have been added as standard operating procedures, see pages 25 and 26.

19-25 The information presented in Table 3-1 was based on stream survey and wildlife habitat inventory data collected in 1979 and 1980, and is the best information available. Appendix 3C shows how the condition class ratings were arrived at and on what parameters they were based.

19-26 See response 8-1, 8-2, 19-10.

22-1 See response 17-1

23-1 See responses 6-1 and 12-1.

23-2 See response 15-7.

There will be no need for application of pesticides to maintain the proposed rights-of-way.

24-1 As stated in the Draft RMP/EIS under the Preferred alternative on page 2-11 and under the Economic Development alternative on page 2-25, one of the purposes of the land tenure adjustment proposals would be to meet the needs of agriculture, in addition to lands needed for the Desert Land Entry and Carey Act programs. Even though disposals to complement existing ranching operations were not specifically addressed in the RMP, such actions would be possible under either of the two alternatives mentioned and would be considered on a case-by-case basis. Type of sale or method of disposal would depend on the individual situation.

24-2 In some cases heavy use by wildlife and wild horses may negate to some extent the benefits of resting an area from livestock grazing. However, it is a Nevada state law as well a BLM policy that wildlife have access to waters it customarily uses. It is also BLM policy that water be made available to wild horses wherever possible and practical.

See also responses 11-4 and 14-8

T1-1 Since one of the purposes of a wilderness area is to provide opportunities for a "primitive and unconfined type of recreation," there are no provisions for providing services to people who use these areas other than what might be available through local agencies and oganizations such as the county sheriff or search and rescue teams. If the Antelope wilderness study area is designated wilderness, a wilderness managment plan will be written for the area. The need for provisions to take care of people using the area will be considered and addressed in that plan.

T1-2 There are no provisions for keeping the roads in the area open during any season.

T1-3 Livestock grazing is a valid existing use in the Antelope wilderness study area that would continue in the same manner and degree should the area become wilderness. The BLM Wilderness Management Policy states that in connection with the livestock operation "where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment." In addition the policy also directs that "allotment managment plans for allotments partially or entirely within designated wilderness will specifically identify the following:

a. "The use of motor vehicles, motorized equipment or other forms of mechanical equipment including: specific equipment, where it is to be used, and what it is to be used for."

T2-1 Section 14 was identified for potential disposal under the Economic Development alternative, however neither section was identified under the Preferred alternative. With the exception of the NW 1/4 of section 14, the area is rather steep and rough and not considered suitable for farming. Most of the two sections are above 5,000 feet elevation. Areas above 5,000 feet were considered unsuitable for disposal because of their value as wildlife habitat. In addition, there are numerous mining claims and several rights-of-way in the area. Because of these conflicts, it is felt that these two sections are not suitable for disposal in the foreseeable future.

T3-1 The nubmer 30 refers not to the number of horses but to the number of AUMs estimated to be used by burros in the east side of the allotment (see map 2-4 in the Draft RMP/EIS). The 30 AUMs would be equivalent to 5 burros using the area for 6 months.

T3-2 The Nevada Department of Wildlife (NDOW) identifies a large winter use area for mule deer along the east base of the Toiyabe Range. A portion of this winter range occurs on the west side of the Kingston Allotment (see map 3-1 in Draft RMP/EIS). The BLM and NDOW have estimated that the average seasonal forage use by mule deer on this area is 490 AUMs, although the number may vary from year to year depending on winter severity, forage availability, and so forth.

T3-3 The 78 refers to the estimated AUM demand for burros, in the Hickison summit area. The 354 AUMs is the BLM/NDOW estimate of forage use by wildlife throughout the Simpson Park Allotment. This would include use by antelope in the Cape Horn area as well as mule deer in the south end of the Simpson Park mountains and in a small portion of the Toiyabe Range outside the forest service boundary.

T3-4 All the land identified potentially suitable for disposal meet the cirteria outlined in Section 203(a) of the Federal Land Policy and Management Act. It was not the intent of the RMP to recommend disposal simply to square up land status patterns. Blocked ownership patterns were recommended primarily for difficult to manage parcels and would consider the needs of the private sector.

T4-1 Each area identified during the wilderness inventory as a wilderness study area possessed the wilderness characteristics of size, naturalness, and outstanding opportunities for solitude or primitive and unconfined recreation. Wilderness study area status was not determined on the basis of being a roadless area alone.

T4-2 See response to comment 17-1

T4-3 In developing the criteria upon which to base selection of the Preferred alternative, a specific criteria for minerals was not included nor was any identified for any other specific resource, i.e., wildlife, range, cultural resources, etc. The criteria was written to include all resources, both renewable and non-renewable. Renewable resources are mentioned only in terms of how they will be managed, i.e., "upon a sustained yield basis." However, minerals, though not specifically mentioned, are included in the other criteria which consider multiple use and present and potential uses of public land, social and economic impacts, and so forth.

Even though mineral development is not a specific issue in the resource management plan, it is considered separately in terms of the impacts the proposals in the RMP would have on minerals and minerals development. This was felt to be the most effective way to deal with this resource. See also response to comment 17-1.

T4-4 Currently there is very little exploration and no development within the wilderness study areas. Since the local areas are not currently dependent upon any mining activity within the study area, no significant economic or social impacts are foreseen.

T4-5 The economic analysis was based on the most current information available at the time. There are no data in the updated information that would significantly change the original analysis.

T4-6 The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road." The Interior Board of Land Appeals (IBSA) has not reversed this decision. Additionally, the IBLA has ruled the use of cherrystem roads by the BLM as an acceptable practice in delineating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

T5-1 See Response 5-1.

T6-1 Mineral potential is only one of six quality standards that are considered when analyzing an area's potential for wilderness. Along with the six quality standards there are also two criteria that must also be considered (see p. 1-2 in the Draft RMP/EIS).

T7-1 The narrow portions of the Simpson Park wilderness study area have private land protruding into the boundary which would cause manageability problems. This is not the case, however, in the narrow portions of the Roberts wilderness study area.

See also response 5-1

T8-1 See response 5-1

T9-1 The method used to predict the total number of archaeological sites in the Shoshone-Eureka Resource Area is the simple formula of the number of sites recorded divided by the number of acres inventoried multiplied by the the total number of acres in the resource area. The fact that these predicted sites have not been investigated will have no more effect on future development than the 856 known sites have had on past development. Rarely are archaeological sites so significant that they cannot be mitigated by avoidance or data collection. Also, since archaeological sites are not randomly distributed, there are vast areas of the resource area where there is little chance of finding cultural resources. With proper advanced planning, many development projects can be located in these areas of low sensitivity.

Significance of archaeological sites is based on several criteria including, but not exclusively, area of the site, span of time over which the site was used or reused, number of different kinds of activities represented by the cultural material, degree of preservation of the site, data potential, and last, but not least, professional judgement of knowledgeable archaeologists.

T10-1 The 104,959 acres identified in the Preferred alternative is a pool of lands potentially suitable for disposal. Lands actually disposed of would be selected from this pool. The 58,440 acres shown in Table 5-1 is an estimate of the acreage that would be disposed of during the life of the plan.

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