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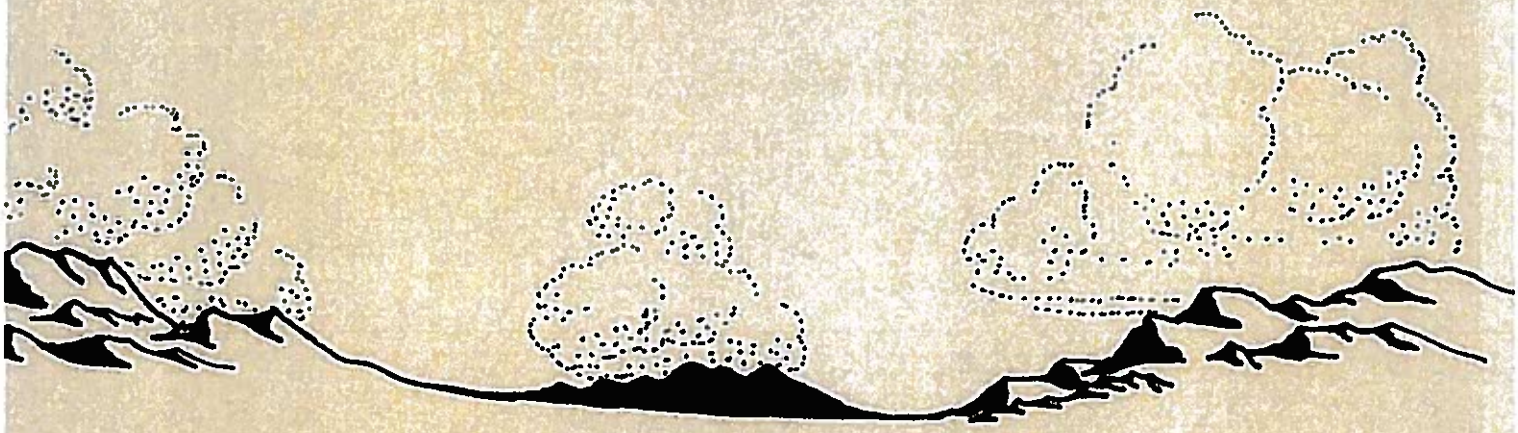
SHOSHONE - EUREKA

Proposed
Resource Management Plan Amendment
and
FINAL
Environmental Impact Statement



U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management
Battle Mountain District Office
Battle Mountain, Nevada

PROPOSED RESOURCE MANAGEMENT PLAN AMENDMENT 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 Battle Mountain District of the Bureau of Land Management proposes to amend the Shoshone-Eureka Resource Management Plan (RMP). Two alternatives have been analyzed, a Proposed RMP Amendment and a No Action Alternative. The Proposed RMP Amendment displays one way to manage livestock grazing use and wildlife habitat needs. The No Action Alternative is the implementation of the Shoshone-Eureka Record of Decision issued in March 1986.

This document is the Final Environmental Impact Statement for The Proposed Amendment.

For further information contact: Terry L. Plummer, 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 the public.

AUG 28

PREFACE

The Shoshone-Eureka Proposed Resource Management Plan Amendment has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations and must be used in conjunction with the Draft RMP Amendment. This document contains the summary from the draft document, the proposed Resource Management Plan Amendment, revisions and errata of the draft by chapter, written comments received during the public review process, and the responses to those comments.

All proposals contained herein are subject to protest as outlined in 43 CFR 1610.5-2. Protests must be filed within thirty days after release of this document (see date on title page) with the Director of the Bureau of Land Management, 18th and C Streets, N.W., Washington, D.C. 20240, and should contain the following information:

- The name, mailing address, telephone number, and interest of the person filing the protest.
- A statement of the issue or issues being protested.
- A statement of the part or parts of the document being protested.
- A copy of all documents addressing the issue or issues previously submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the records.
- A short, concise statement explaining precisely why the BLM Battle Mountain District Manager's decision is wrong.

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PURPOSE AND NEED FOR ACTION

Reexamination of the criteria used to categorize livestock grazing allotments resulted in the deletion of one criterion (Funding and Manpower Capability). The elimination of the one criterion, along with some new information on allotment conditions and trends, prompted a recategorization of allotments. This recategorization added 14 more allotments to the "I" (Improve) Category for a total of 28. An assessment of these categorization changes indicates there are significant differences in impacts between the allotment categorization and associated management actions in the current Resource Management Plan (RMP) as compared to the proposed recategorization of allotments and associated management actions. The changes in management actions associated with the recategorization of allotments are significant enough to require an amendment to the RMP, including assessment through an environmental impact statement.

SUMMARY

Introduction

The Battle Mountain District of the Bureau of Land Management proposes to implement an RMP Amendment to manage livestock use and mitigate impacts on wildlife habitat from livestock grazing on a high percentage of the Shoshone-Eureka Resource Area currently managed as "Maintain" and "Custodial" Category Allotments. Two alternatives have been prepared for analysis purposes. A Proposed Amendment and a No Action Alternative examine different solutions to the resource management issue. Each of the alternatives is multiple-use oriented and differs significantly in the balance struck among resource uses.

The Council on Environmental Quality Regulations (40 CFR parts 1500-1508), which interpret the National Environmental Policy Act, (Pub. L. 91-190, 42 U.S.C., 4321-4347, as amended), require that a No Action Alternative be included as part of each EIS. The No Action Alternative provides a useful benchmark by which to measure and assess the environmental consequences of the other alternatives.

Only the livestock management issue was identified for analysis in this Proposed Amendment.

In order to facilitate project level planning, the resource area has been divided into four resource conflict areas (RCAs). Each RCA has a unique set of resources that warrant specific management considerations.

The Proposed Amendment

Through implementation of the Proposed Amendment, the Bureau of Land Management would seek to obtain the following objectives:

Manage livestock use at 239,717 animal unit months (AUMs) (5-year average use) in the short term and determine if such use can be maintained. In the long term, manage livestock use at 262,500 AUMs.

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 Nevada Rangeland Monitoring Handbook to allow more plants to complete growth cycles and to increase storage of reserves for future growth.

In the long term, improve ecological condition of 585,191 acres to good condition and 25,990 acres to excellent condition.

In the long term, stop downward trends in ecological condition on 464,873 acres and manage for upward trends on 634,868 acres.

In the long term, improve and maintain 133,075 acres of big game habitat in good condition and 6,104 acres in excellent condition.

In the long term, stop downward trends on 65,702 acres of big game habitat and manage for upward trends on 144,186 acres.

In the short term, improve and maintain in good or better condition 64 miles of aquatic habitat and 768 acres of riparian habitat associated with the streams and an additional 1,067 acres of other meadows, springs, and aspen groves.

In the long term, improve and maintain in good or better condition a total of 84.8 miles of aquatic habitat and 1,018 acres of riparian habitat associated with the streams and an additional 1,414 acres of other meadows, springs, and aspen groves.

No Action Alternative

Under the No Action Alternative, the Shoshone-Eureka RMP would be implemented as directed in the Record of Decision issued in March 1986.

Table S-1 shows the environmental consequences of each alternative in comparative form.

TABLE S-1
COMPARATIVE REVIEW OF THE ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES BY AFFECTED ENVIRONMENTAL COMPONENT

Environmental Component	Measurement Parameter	Proposed Amendment	No Action 6/ Alternative	Percent Change by Implementing Proposed Amendment as Compared to the No Action Alternative
WILDLIFE RIPARIAN & AQUATIC CONDITION	Riparian Habitat Condition (acres) (% change) Projected short term.			
	Poor	1,483 (+3) 2/	1,809 (+10)	-7 (NS) 1/
	Fair	585 (-43)	824 (-38)	-5 (NS)
	Good-Improve 3/	1,835 (+40)	1,270 (+28)	+12 (SB) More good conditions
	Good-Maintain 4/ 5/	657 (0)	657 (0)	0
	Projected long term			
	Poor	1,333 (0)	2,053 (+16)	-16 (SB) Less poor conditions
	Fair	138 (-53)	330 (-49)	-4 (NS)
	Good-Improve	2,432 (+53)	1,520 (+33)	+20 (SB) More good conditions
	Good-Maintain	657 (0)	657 (0)	0
	Aquatic Habitat Condition (miles) (% change) Projected short-term			
	Poor	51.7 (+3)	51.7 (+3)	0
	Fair	20.4 (-43)	20.4 (-43)	0
	Good-Improve	64 (+40)	64 (+40)	0
	Good-Maintain	22.9 (0)	22.9 (0)	0
	Projected long term			
	Poor	46.5 (0)	63.9 (+11)	-11 (SB) Less poor conditions
	Fair	4.8 (-53)	8.2 (-51)	-2 (NS)
	Good-Improve	84.8 (+53)	64 (+40)	+13 (SB) More good conditions
	Good-Maintain	22.9 (0)	22.9 (0)	0
TERRESTRIAL BIG GAME HABITAT CONDITION AND TREND	Projected Long Term Condition (acres) (% change)			
	Poor	26,702 (-1)	28,606 (-1)	-0 (NS)
	Fair	439,484 (-15)	469,241 (-11)	-4 (NS)
	Good	361,144 (+15)	329,483 (+11)	+4 (NS)
	Excellent	39,410 (+1)	39,410 (+1)	0
	Projected Long Term Trend (acres) (% Change)			
	Down	0 (-8)	0 (-8)	0
	Static	674,998 (-7)	709,881 (-3)	-4 (NS)
	Up	191,742 (+15)	156,859 (+11)	+4 (NS)
	Projected Long Term 7/ (% Change)	262,500 (+10)	259,229 (+8)	+2 (NS)
LIVESTOCK GRAZING	Availability of forage (animal Unit months)			
	Projected short term (% change)	239,717 (0)	239,717 (0)	0
	Projected long term 1/ (% change)	262,500 (+10)	259,229 (+8)	+2 (NS)

TABLE S-1
COMPARATIVE REVIEW OF THE ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES BY AFFECTED ENVIRONMENTAL COMPONENT (continued)

Environmental Component	Measurement Parameter	Proposed Amendment	No Action 6/ Alternative	Percent Change by Implementing Proposed Amendment as Compared to the No Action Alternative
VEGETATION ECOLOGICAL CONDITION AND TREND	Projected Long-term condition (acres) (% change)			
	POOR	145,563 (-1)	152,955 (-1)	0
	FAIR	2,357,040 (-13)	2,541,696 (-9)	-4 (NS)
	GOOD	1,753,327 (+13)	1,569,908 (+9)	+4 (NS)
	EXCELLENT	109,886 (+1)	101,257 (+1)	0
	Projected Long-term trend (acres) (% change)			
	DOWN	0 (-11)	0 (-11)	0
	STATIC	3,442,766 (-2)	3,636,368 (+2)	-4 (NS)
	UP	923,050 (+13)	729,448 (+9)	+4 (NS)
WILD HORSES AND BURROS	Fencing (miles)			
	Short Term	222	112.5	(SA)
	Long Term	746.5	315.5	(SA)
	Water Developments (No.)			
	Short Term	37	26	(SB)
	Long Term 7/	150	68	(SB)

Source: Shoshone-Eureka planning team estimates

1/ Appendix B provides the "Basis for Assessment of Significant Environmental Impacts".

NS = Not a significant impact
SB = Significant beneficial impact
SA = Significant adverse impact

2/ Percent change from existing conditions.

3/ Improve to good conditions from poor and fair condition classes

4/ Maintain in current good condition

5/ Threshold is good or better condition. Some areas included in good condition class may actually be in excellent condition.

6/ The No Action Alternative is the implementation of the Shoshone-Eureka Record of Decision issued in March 1986.

7/ Cumulative short term plus long term.

THE PROPOSED RESOURCE MANAGEMENT PLAN AMENDMENT

The following sections describe the objectives 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 alternative are shown on Table 2-2.

Objectives

Manage livestock use at 239,717 AUMs (5-year average use) in the short term and determine if such use can be maintained. In the long term, manage livestock use at 262,500 AUMs.

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 Nevada Rangeland Monitoring Handbook to allow more plants to complete growth cycles and to increase storage of reserves for future growth.

In the long term, improve ecological condition of 585,191 acres to good condition and 25,990 acres to excellent condition.

In the long term, stop downward trends in ecological condition on 464,873 acres and manage for upward trends on 634,868 acres.

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In the short term, improve and maintain in good or better condition 64 miles of aquatic habitat and 768 acres of riparian habitat associated with the streams and an additional 1,067 acres of other meadows, springs, and aspen groves.

In the long term, improve and maintain in good or better condition a total of 84.8 miles of aquatic habitat and 1,018 acres of riparian habitat associated with the streams and an additional 1,414 acres of other meadows, springs, and aspen groves.

Short-Term Management Actions

1. The initial licensed use by livestock is anticipated to continue at the 5-year (1977-1981) average licensed use levels (239,717 AUMs), which is 20 percent below active preference. However, livestock use may be licensed up to active preference (300,572 AUMs).

2. 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.

Actions could include, but would not be limited to, change in seasons-of-use, implementation of deferment and rest rotation grazing systems, change in livestock numbers, correction of livestock distribution problems, alteration of the number of wild horses, and development of range improvements. Specific measures to improve wildlife habitat could include, but would not be limited to, restricting livestock use along streams to late summer or fall, limiting grazing use on riparian areas to moderate levels, fencing meadows and stream corridors, limiting grazing use on bitterbrush to moderate levels by winter in crucial mule deer winter range, constructing wildlife guzzlers for water, and planting desirable shrub and forb seeds in vegetation manipulation projects.

3. Implement allotment management plans on ten allotments in the "improve" category.

   The projects needed to support these plans are described below and summarized in Table 2-2. Appendix A of the Draft Amendment lists anticipated range projects by allotment.

   Develop 16 reservoirs to provide water in areas with 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 21 springs to promote better distribution of livestock for better utilization of vegetation. This action would include the installation of 20 miles of pipeline and 36 water troughs.

   Construct 222 miles of fence to foster better distribution of livestock for more even utilization of vegetation. This action would include installation of 15 cattle guards.

   Manipulate 7,500 acres of vegetation by plowing, burning, spraying and seeding, or reseeding to increase available forage for livestock, wild horses, and big game and to improve water infiltration and holding capacity. The areas would be fenced to allow establishment of the seeded species.

Long-Term Management Actions

1. As a result of long term management actions, available forage is projected to increase by 22,783 animal unit months above the 5 year average licensed use.

   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 Proposed Amendment.

   It is expected that a total of 18 additional livestock grazing allotment management plans (AMPs) would be implemented by the end of the long term. Table 2-2 summarizes the range improvement projects in support of AMPs for both the short and long term. Appendix A of the Draft Amendment lists anticipated range improvement projects by allotment.

TABLE 2-2

KEY MANAGEMENT ACTION OF THE PROPOSED AMENDMENT BY RESOURCE CONFLICT AREA

Issue/Action	South Shoshone RCA 1/	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone-Eureka Resource Area
LIVESTOCK:					
Initial level of use (5-Year average licensed use 2/	90,236	16,355	107,942	25,184	239,717
Licensed use as a result of livestock actions in the					
Short Term	90,236	16,355	107,942	25,184	239,717
Long Term	99,081	17,827	118,198	27,394	262,500
Number of allotment management plans					
Short Term	2	0	8	0	10
Long Term	5	2	8	3	18
Total	7	2	16	3	28
Number of water developments 3/					
Short Term	14	0	23	0	37
Long Term	36	22	43	12	113
Total	50	22	66	12	150
Miles of fence 3/					
Short Term	105	0	117	0	222
Long Term	101	130	208	86	525
Total	206	130	325	86	747
Acres of vegetation manipulation 3/					
Short Term	2,150	0	5,350	0	7,500
Long Term	4,250	0	3,925	2,000	10,175
Total	6,400	0	9,275	2,000	17,675
Cost of livestock improvement projects 3/ ($)					
Short Term	407,900	0	597,800	0	1,005,700
Long Term	720,250	527,800	1,034,375	382,400	2,664,825
Total	1,128,150	527,800	1,632,175	382,400	3,670,525

1/ Resource Conflict Areas
2/ Animal Unit Months
3/ The number of projects displayed is limited to those the resource area anticipates could be funded with range betterment funds only, and therefore does not include any funding through other public or private contributions. The resource area estimate of range betterment funding available annually is approximately $200,000.

IMPLEMENTATION OF THE RESOURCE MANAGEMENT PLAN

A discussion on implementation of the RMP, including sections on Selective Management, the Rangeland Monitoring Program, and Standard Operating Procedures (SOPs) can be found in the Shoshone-Eureka Resource Area Record of Decision issued March 1986. One additional SOP is included as follows:

> Appropriate actions will be taken on all wildfire occurrence within the planning area. A fire activity plan will be developed to identify appropriate suppression actions to be taken under differing weather and fuel conditions.

REVISIONS AND ERRATA

A. This section contains revisions, errata, and additions to those portions of the Draft Amendment that are reprinted in this Proposed Amendment/Final EIS.

Summary

On page 2 of this document, the 3rd and 4th paragraphs state the objectives for ecological condition and trend in more specific terms and in a similar format to the other stated objectives.

On page 2 of this document, the number 126,967 in the 5th paragraph has been changed to 133,075 acres to correct a calculation error.

On page 2 of this document, the number 129,941 in the 6th paragraph has been changed to 144,186 acres to correct a calculation error.

On page 3 of this document, Table S-1 has been changed as follows:

> Within the "Terrestrial Big Game Habitat Condition and Trend" component, the percentage in parenthesis for poor condition under the Proposed Amendment column is changed from -2 to -1. The percentage in parenthesis for fair condition is changed from -14 to -15. This also changes the difference between alternatives shown in the far right column from -1 to 0 for poor, and -3 to -4 for fair.

On page 4 of this document, Table S-1 (continued) has been changed as follows:

> The "Vegetation Ecological Condition and Trend" component has been reformatted to be the same as the other environmental components and offers a more specific review of the projected changes in condition and trend.
>
> A new environmental component on Wild Horses and Burros has been added to Table S-1, with fencing and water developments being the measurement parameter.

Chapter 4

On Tables 4-1 and 4-2, minor changes have been made in the percentages for Terrestrial Wildlife Habitat Condition and Trend, as well as reformatting the Vegetation Section to follow the format of the other Environmental Components. A new Environmental Component on Wild Horses and Burros has also been added with fencing and water developments being the measurement parameter. These two tables, with changes, have been reprinted in the Appendices that follow this section.

A new section titled "Wild Horses and Burros" is added to the Environmental Consequences chapter and discusses the impacts of fences and water developments on wild horses and burros as follows:

The Proposed Amendment would fence twice as many miles (222) in the short term as the No Action Alternative (112.5). In the long term, the Proposed Amendment would fence more than twice as many miles (746.5) as the No Action Alternative (315.5). This is directly related to implementation of 28 AMPs under the Proposed Amendment compared to 14 AMPs under the No Action Alternative.

The addition of new fences in Herd Management Areas would interfere with the free-roaming behavior of the herds. Specifically, impacts to wild horses could result from horses becoming entangled in fences when attempting to cross; horses becoming entangled in fences during removal operations; and horses being denied access to important habitat areas, such as water or forage, during periods of environmental extremes. Such impacts could result in the death of a few to many wild horses, depending upon the specific circumstances or combinations thereof which occur. In summary, only obstruction to normal distribution and movement patterns would be a significant adverse impact. However, fences would be constructed to reduce interference with normal distribution and movement patterns. Project proposals will be analyzed according to the SOPs listed on pages 2-35 through 2-37 of the Shoshone-Eureka RMP/DEIS. (See response to comment 6-7).

The Proposed Amendment also shows 37 water developments in the short term and an additional 113 in the long term, for a total of 150 water developments. The No Action Alternative shows 26 water developments in the short term and an additional 42 in the long term, for a total of 68 water developments. The increased number of water developments under the Proposed Amendment would provide additional watering sites for wild horses, which would be a significant beneficial impact.

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

List of Tables

On page ii, delete "S-2 Final Allotment AUM Tables by Resource Conflict and Alternative.... S-3."

On page ii, Change Table number 4-4 to 4-2.

List of Maps

On page ii, under "Wildlife Management Area," change the page number to read 3-4.

Chapter 1

On page 1-2, the paragraph at the bottom of the left hand column is changed to read: "The alternatives will include (1) a Proposed Amendment that displays one way to manage...." (See response to comment 1-1.)

On page 1-3, the first sentence at the top of the left hand column is changed to read: "Consideration will be given to socio-economic impacts upon local communities." (See response to comment 1-2.)

Chapter 4

On page 4-1 in the second paragraph of the left column, delete the words "wild horses and burros." See response to comment 6-13.

On page 4-2, under Wildlife Habitat, a number in the second sentence is changed form 126,967 to 133,075 acres. A number in the third sentence is changed from 129,941 to 144,186 acres.

On page 4-2, under Wildlife Habitat, the numbers in the first sentence of the second paragraph are changed from 15 to 16 percent, and 3 to 4 percent.

On page 4-5, the second paragraph in the right column is changed to read, "The development of 17,675 acres of vegetation manipulation...."

On page 4-5, under Vegetation, a number in the first sentence is changed from 23 to 13 percent.

On page 4-7, under Wildlife Habitat, the numbers in the second sentence are changed from 95,306 to 101,152, and 6,104 to 4,570 acres. A number in the third sentence is changed from 95,058 to 109,301 acres.

On page 4-7, under Wildlife Habitat, a number in the first sentence of the second paragraph is changed from 3 to 4 percent.

On page 4-9, under Vegetation, a number in the first sentence is changed from 19 to 11 percent.

Appendices

On page A-1, the last sentence of the first paragraph is changed to read: "..., can be found on pages A-3 through A-6."

Tables 4-1 and 4-2 from the Draft Amendment are reprinted with changes, following this section.

Tables A-1 through A-4 also follow this section. These are new tables which show, by allotment and alternative, the number of acres to be improved for Ecological Condition and Trend and Terrestrial Big Game Habitat Condition and Trend. These are provided as supportive data summarized in the Draft Amendment.

On page B-2, add a description of the threshold for significant impacts to wild horses and burros as follows (also see response to comment 6-13):

E.	Wild Horses and Burros	Effect on Free-Roaming Character	Any action which results in the enhancement of or interference with the normal distribution and movement patterns of wild horses within a herd use area.

TABLE 4-1

IMPACTS OF THE PROPOSED AMENDMENT BY RESOURCE CONFLICT AREA

Environmental Component	South Shoshone RCA[1]	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone Eureka Resource Area	Impacts Compared To the No Action Alternative
WILDLIFE						
Riparian habitat condition (acres)						
Projected short term						
Poor	651	330	79	423	1,483 (+3)[2]	-7[3] (NS)[4]
Fair	72	215	79	219	585 (-43)	-5 (NS)
Good-Improve[5]	631	0	1,204	0	1,835 (+40)	+12 (SB)
Good-Maintain[6] [7]	43	144	470	0	657 (0)	0
Projected long term						
Poor	665	184	126	358	1,333 (0)	-16 (SB)
Fair	28	32	32	46	138 (-53)	-4 (NS)
Good-Improve	660	330	1,204	238	2,432 (+53)	+20 (SB)
Good-Maintain	43	144	470	0	657 (0)	0
Aquatic habitat condition (miles of stream)						
Projected short term						
Poor	22.7	11.5	2.75	14.75	51.7 (+3)	0
Fair	2.5	7.5	2.75	7.65	20.4 (-43)	0
Good-Improve	22.0	0	42.0	0	64.0[8] (+40)	0
Good-Maintain	1.5	5.0	16.4	0	22.9 (0)	0
Projected long term						
Poor	23.2	6.4	4.4	12.5	46.5 (0)	-11 (SB)
Fair	1.0	1.1	1.1	1.6	4.8 (-53)	-2 (NS)
Good-Improve	23.0	11.5	42.0	8.3	84.8 (+53)	+13 (SB)
Good-Maintain	1.5	5.0	16.4	0	22.9 (0)	0
Terrestrial Big Game Habitat Condition and Trend						
Projected long term condition (acres)(% change)						
Poor	(Wildlife Habitat Management Area				26,702 (-1)	0
Fair	boundaries do not follow Resource				439,484 (-15)	-4 (NS)
Good	Conflict Area boundaries, therefore				361,144 (+15)	+4 (NS)
Excellent	the impacts are only displayed on				39,410 (+1)	0
Projected long term trend (acres)(% change)	the Resource Area level).					
Down					0 (-8)	0
Static					674,998 (-7)	-4 (NS)
Up					191,742 (+15)	+4 (NS)
LIVESTOCK GRAZING						
Availability of forage (animal unit months)						
Current use/ 5-year average licensed use	90,236	16,355	107,942	25,184	239,717	
Projected short term	90,236	16,355	107,942	25,184	239,717 (0)	0
Projected long term[9]	99,081	17,827	118,198	27,394	262,500 (+10)	+2 (NS)

TABLE 4-1

IMPACTS OF THE PROPOSED AMENDMENT BY RESOURCE CONFLICT AREA (continued)

Environmental Component	South Shoshone RCA 1/	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone Eureka Resource Area	Impacts Compared To the No Action Alternative
VEGETATION						
Ecological Condition and Trend						
Projected Long Term Condition (acres) (% change)						
Poor	64,605	4,894	61,784	14,280	145,563 (-1) 2/	0
Fair	821,282	93,221	1,006,436	436,101	2,357,040 (-13)	-4 (NS)
Good	678,329	80,198	785,861	208,939	1,753,327 (+13)	+4 (NS)
Excellent	9,765	1,453	83,845	14,823	109,886 (+1)	0
Projected Long Term Trend (acres) (% change)						
Down	0	0	0	0	0 (-11)	0
Static	1,337,662	146,804	1,427,470	530,830	3,442,766 (-2)	-4 (NS)
Up	236,319	32,962	510,456	143,313	923,050 (+13)	+4 (NS)
WILD HORSES AND BURROS						
Fencing (miles)						
Short Term	105	0	117	0	222	(SA)
Long Term 9/	206	130	325	86	747	(SA)
Water Developments (No.)						
Short Term	14	0	23	0	37	(SB)
Long Term 9/	50	22	66	12	150	(SB)

Source: Shoshone-Eureka planning team estimates

1/ Resource Conflict Area

2/ Percent change from existing conditions

3/ Percent change from the No Action Alternative (1986 Shoshone-Eureka Resource Management Plan/Record of Decision)

4/ NS = Not a significant impact
SB = Significant beneficial impact
SA = Significant adverse impact

5/ Improve to good conditions from poor and fair condition classes

6/ Threshold is good or better condition. Some areas included in good condition class may actually be in excellent condition.

7/ Maintain in current good conditions.

8/ The 1986 Shoshone-Eureka RMP/ROD stated 64 miles of stream would be improved in the short term, and listed the names of those streams. The above 64 miles of stream includes all the streams listed in the 1986 RMP/ROD plus two additional streams but minus the miles of stream passing through private lands.

9/ Cumulative short and long term.

TABLE 4-2

IMPACTS OF THE NO ACTION ALTERNATIVE BY RESOURCE CONFLICT AREA

Environmental Component	South Shoshone RCA[1]	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone Eureka Resource Area	Impacts Compared To the No Action Alternative
WILDLIFE						
Riparian habitat condition (acres)						
Projected short term						
Poor	749	330	307	423	1,809 (+10)[2]	+7[3] (NS)[4]
Fair	83	215	307	219	824 (-38)	+5 (NS)
Good-Improve[5]	522	0	748	0	1,270 (+28)	-12 (SA)
Good-Maintain[6] [7]	43	144	470	0	657 (0)	0
Projected long term[8]						
Poor	749	459	291	554	2,053 (+16)	+16 (SA)
Fair	83	86	72	89	330 (-49)	+4 (NS)
Good-Improve	522	0	998	0	1,520 (+33)	-20 (SA)
Good-Maintain	43	144	470	0	657 (0)	0
Aquatic Habitat Condition (miles of stream)						
Projected short term						
Poor	22.7	11.5	2.75	14.75	51.7 (+3)	0
Fair	2.5	7.5	2.75	7.65	20.4 (-43)	0
Good-Improve	22.0	0	42.0	0	64.0 (+40)	0
Good-Maintain	1.5	5.0	16.4	0	22.9 (0)	0
Projected long term						
Poor	24.2	16.0	4.4	19.3	63.9 (+11)	+11 (SA)
Fair	1.0	3.0	1.1	3.1	8.2 (-51)	+2 (NS)
Good-Improve	22.0	0	42.0	0	64.0 (+40)	-13 (SA)
Good-Maintain	1.5	5.0	16.4	0	22.9 (0)	0
Terrestrial Big Game Habitat Condition and Trend						
Projected long term condition (acres)(% change)						
Poor	(Wildlife Habitat Management Area				28,606 (-1)	0
Fair	boundaries do not follow Resource				469,241 (-11)	+4 (NS)
Good	Conflict Area boundaries, therefore				329,483 (+11)	-4 (NS)
Excellent	the impacts are only displayed on				39,410 (+1)	0
Projected long term trend (acres)(% change)	the resource area level).					
Down					0 (-8)	0
Static					709,881 (-3)	+4 (NS)
Up					156,869 (+11)	-4 (NS)
LIVESTOCK GRAZING						
Availability of forage (animal Unit months)						
Current use/ 5-year average licensed use	90,236	16,355	107,942	25,184	239,717	
Projected Short Term	90,236	16,355	107,942	25,184	239,717 (0)	0
Projected Long Term[8]	100,365	16,355	117,325	25,184	259,229 (+8)	-2 (NS)

TABLE 4-2

IMPACTS OF THE NO ACTION ALTERNATIVE BY RESOURCE CONFLICT AREA (continued)

Environmental Component	South Shoshone RCA 1/	North Shoshone RCA	Eureka RCA	Southern Valley RCA	Shoshone Eureka Resource Area	Impacts Compared To the No Action Alternative
VEGETATION						
Ecological Condition and Trend						
Projected Long Term Condition (acres) (% change)						
Poor	64,962	6,118	65,925	15,950	152,955 (-1) 2/	0
Fair	816,712	122,588	1,077,003	525,393	2,541,696 (-9)	+4 (NS)
Good	648,113	51,060	714,637	120,098	1,569,908 (+9)	-4 (NS)
Excellent	8,194	0	80,361	12,702	101,257 (+1)	0
Projected Long-Term Trend (acres) (% change)						
Down	0	0	0	0	0 (-11)	0
Static	1,335,288	179,766	1,508,768	612,546	3,636,368 (+2)	+4 (NS)
Up	238,693	0	429,158	61,597	729,448 (+9)	-4 (NS)
WILD HORSES AND BURROS						
Fencing (Miles)						
Short Term	43	0	70	0	113	(SB)
Long Term 8/	182	0	134	0	316	(SB)
Water Developments						
Short Term	16	0	10	0	26	(SA)
Long Term 8/	44	0	24	0	68	(SA)

Source: Shoshone-Eureka planning team estimates

1/ Resource Conflict Area

2/ Percent change from existing conditions

3/ Percent change from the Proposed Amendment

4/ NS = Not a significant impact
SB = Significant beneficial impact
SA = Significant adverse impact

5/ Improve to good conditions from poor and fair condition classes

6/ Threshold is good or better condition. Some areas included in good condition class may actually be in excellent condition.

7/ Maintain in current good conditions.

8/ Cumulative short and long term.

TABLE A-1

PROPOSED AMENDMENT
IMPROVEMENT IN ECOLOGICAL CONDITION AND TREND (Long Term)[1/]

	Ecological Condition Class			Trend	
Allotment	Fair Acres	Good Acres	Excellent Acres	Down to Static Acres	Up Acres
Three Bar	576	11,612	557	3,416	12,745
Austin	-	50,653	596	59,355	51,249
Gilbert Creek	1,865	26,738	2,985	116,154	31,588
Grass Valley	-	45,964	2,546	-	48,510
Fish Creek Ranch	4,320	51,838	1,728	-	57,886
Seven - Mile	663	12,380	751	4,333	13,794
Roberts Mtn.	1,133	22,844	1,096	6,721	25,073
Diamond Springs	523	6,271	1,045	-	7,839
Black Point	400	8,903	400	-	9,703
Dry Creek	-	22,384	1,791	-	24,175
Shannon Station/ Spanish Gulch	292	6,414	350	-	7,056
Buffalo Valley	-	23,515	664	15,548	24,179
Simpson Park	735	17,386	686	4,799	18,807
Romano	506	12,816	405	-	13,727
Santa Fe-Ferguson	633	15,821	506	3,375	16,960
Underwood	184	2,510	404	-	3,098
Porter Canyon	-	22,840	938	10,012	23,778
S. Smith Creek	-	32,088	680	-	32,768
Three Mile	200	5,727	67	1,305	5,994
Copper Canyon	-	10,705	413	2,606	11,118
Argenta	918	19,886	1,040	15,784	21,844
Carico Lake	8,612	99,038	3,158	97,028	110,808
Tierney Creek	-	939	69	613	1,008
Flynn-Parman	-	4,520	232	-	4,752
Potts	1,251	36,034	503	-	37,788
Cottonwood	876	8,760	2,219	10,395	11,855
Sweeney Wash	-	1,047	87	578	1,134
Clear Creek	-	5,558	74	-	5,632
Manhattan	-	-	-	24,392	-
Mt. Airy	-	-	-	16,216	-
Arambel	-	-	-	4,553	-
Willow Racetrack	-	-	-	354	-
Kingston	-	-	-	3,876	-
Trail Canyon	-	-	-	1,228	-
TOTAL	23,687	585,191	25,990	402,641	634,868

1/ Based upon the professional judgment of the Shoshone-Eureka Area staff using the criteria listed in Appendix A of the Draft Amendment. This table shows acres improved from a lower condition and trend rating and therefore does not show acres that remain the same as existing conditions.

TABLE A-2

NO ACTION ALTERNATIVE
IMPROVEMENT IN ECOLOGICAL CONDITION AND TREND (Long Term)1/

	Ecological Condition Class			Trend	
Allotment	Fair Acres	Good Acres	Excellent Acres	Down to Static Acres	Up Acres
Buffalo	-	23,515	664	15,548	24,179
Tierney Creek	-	939	69	613	1,008
Clear Creek	-	5,558	74	-	5,632
Roberts Mtn.	1,133	22,844	1,096	6,721	25,073
Three Bars	576	11,612	557	3,416	12,745
Diamond Springs	523	6,271	1,045	-	7,839
Austin	-	50,653	596	59,355	51,249
Grass Valley	-	45,964	2,546	-	48,510
Dry Creek	-	22,384	1,791	-	24,175
Mt. Airy	608	12,973	648	14,432	14,229
Fish Creek Ranch	4,320	51,838	1,728	-	57,886
Carico Lake	8,612	99,038	3,158	97,028	110,808
Gilbert Creek	1,865	26,738	2,985	116,154	31,588
Romano	506	12,816	405	-	13,727
Cottonwood	-	-	-	11,680	-
Manhattan Mtn.	-	-	-	24,392	-
Argenta	-	-	-	18,354	-
Copper Canyon	-	-	-	2,870	-
Arambel	-	-	-	4,553	-
Santa Fe-Ferguson	-	-	-	4,219	-
Seven Mile	-	-	-	4,421	-
Simpson Park	-	-	-	4,897	-
Sweeney Wash	-	-	-	722	-
Three-Mile	-	-	-	1,333	-
Willow Racetrack	-	-	-	354	-
Kingston	-	-	-	3,876	-
Trail Canyon	-	-	-	1,228	-
Porter Canyon	-	-	-	12,515	-
TOTAL	18,143	393,143	17,362	408,681	428,648

1/ Based on criteria listed in Appendix A of the Draft Amendment. This table shows acres improved from a lower condition and trend rating and therefore does not show acres that remain the same as existing conditions.

TABLE A-3

PROPOSED AMENDMENT
IMPROVEMENT IN TERRESTRIAL BIG GAME HABITAT
CONDITION AND TREND (Long Term)1/

Habitat Management Plan Area/Allotment	Habitat Condition Class			Trend	
	Fair Acres	Good Acres	Excellent Acres	Down to Static Acres	Up Acres
Shoshone					
Austin	-	3,039	35	3,562	3,074
Carico Lake	2,320	26,678	851	26,137	29,849
Callaghan					
Austin	-	12,623	148	14,791	12,771
Carico Lake	172	1,980	63	1,941	2,215
Grass Valley	-	17,001	942	-	17,943
Simpson Park	66	1,565	62	432	1,693
Simpson Park					
Simpson Park	397	9,388	370	2,591	10,155
Grass Valley	-	16,017	887	-	16,904
Dry Creek	-	4,029	322	-	4,351
Underwood	158	2,160	348	-	2,666
Santa Fe	196	4,904	157	1,046	5,257
JD	-	-	-	-	-
Three Bars	86	1,724	83	507	1,893
Roberts Mtn					
JD	-	-	-	-	-
Roberts Mtn	488	9,850	473	2,897	10,811
Three Bars	252	5,075	243	1,493	5,570
Diamond Hills					
Diamond Springs	261	3,136	523	-	3,920
Three Mile	70	2,004	23	457	2,097
Shannon Station/ Spanish Gulch	166	3,656	199	-	4,021
Black Point	375	8,246	375	-	8,996
TOTALS	5,007	133,075	6,104	55,854	144,186

1/ Based on the criteria listed in Appendix A of the Draft Amendment. This table shows acres improved from a lower condition and trend rating and therefore does not show acres that remain the same as existing conditions.

TABLE A-4

NO ACTION ALTERNATIVE
IMPROVEMENT IN TERRESTRIAL BIG GAME HABITAT
CONDITION AND TREND (Long Term)1/

Habitat Management Plan Area/Allotment	Habitat Condition Class			Trend	
	Fair Acres	Good Acres	Excellent Acres	Down to Static Acres	Up Acres
Shoshone					
Austin	-	3,039	35	3,562	3,074
Carico Lake	2,320	26,678	851	26,137	29,849
Callaghan					
Austin	-	12,623	148	14,791	12,771
Carico Lake	172	1,980	63	1,941	2,215
Grass Valley	-	17,001	942	-	17,943
Simpson Park	-	-	-	-	-
Simpson Park					
Simpson Park	-	-	-	-	-
Grass Valley	-	16,017	887	-	16,904
Dry Creek	-	4,029	322	-	4,351
Underwood	-	-	-	-	-
Santa Fe	-	-	-	-	-
JD	-	-	-	-	-
Three Bars	86	1,724	83	507	1,893
Roberts Mtn					
JD	-	-	-	-	-
Roberts Mtn	488	9,850	473	2,897	10,811
Three Bars	252	5,075	243	1,493	5,570
Diamond Hills					
Diamond Springs	261	3,136	523	-	3,920
Three Mile	-	-	-	-	-
Shannon Station/ Spanish Gulch	-	-	-	-	-
Black Point	-	-	-	-	-
TOTALS	3,579	101,152	4,570	51,328	109,301

1/ Based on the criteria listed in Appendix A of the Draft Amendment. This table shows acres improved from a lower condition and trend rating and therefore does not show acres that remain the same as existing conditions.

CONSULTATION AND COORDINATION

Public Involvement

On June 25, 1986, letters were sent to those on the Shoshone-Eureka RMP mailing list requesting comments on proposed changes to criteria used to categorize grazing allotments in the Shoshone-Eureka Resource Area.

A Notice of Intent to prepare an amendment to the Shoshone-Eureka Resource Management Plan was published in the Federal Register on August 5, 1986. This notice invited the public to participate in issue identification and to review the preliminary planning criteria.

During September 1986, a news release also invited the public to participate in issue identification and to review the preliminary planning criteria.

The Battle Mountain District Advisory Council was briefed on the Proposed Amendment at its October 28, 1986 meeting.

Notice of availability of the Draft Shoshone-Eureka Resource Management Plan Amendment was published in the Federal Register on January 13, 1987.

Earlier in January 1987, copies of the Draft Shoshone-Eureka Resource Management Plan Amendment were mailed to those who requested their name be left on the Shoshone-Eureka RMP mailing list. The opening letter in the Draft Amendment asked for review and comment to ensure concerns would be considered, and listed the three public meetings to be held in March 1987.

News releases were sent out during January 1987, inviting the public to obtain, review, and comment on the draft. The news releases announced the three public meetings in March.

On February 6, 1987, letters were sent to 30 permittees who graze livestock in the allotments proposed for recategorization. The letters included a summary of the information used to recategorize the specific allotments in which they graze livestock. The letter asked these permittees to review the categorization summaries and to prepare any questions. The Shoshone-Eureka Resource Area Range Staff personally talked with each of these permittees in February through April, 1987, answering questions about the categorization process and information used to recategorize specific allotments.

During the last of February 1987, news releases announced the public meetings to be held in March 1987, in Battle Mountain, Eureka, and Reno, Nevada.

Three public meetings were held: March 10, 1987, at 7:00 p.m. in the Bureau of Land Management Shoshone-Eureka Conference Room, Battle Mountain, Nevada; March 11, 1987, at 7:00 p.m. in the Eureka County Courthouse, Eureka, Nevada; March 12, 1987, at 7:00 p.m. in the Holiday Inn Downtown, Reno, Nevada.

Public Review and Meetings

Some 240 copies of the Draft Amendment were distributed to the following reviewing agencies, elected officials, and interested publics:

CONGRESSIONAL

Senator Harry Reid
Senator Chic Hecht
Congressman James Bilbray
Congresswoman Barbara Vucanovich

FEDERAL AGENCIES

Department of Agriculture
Forest Service
Soil Conservation Service
Department of the Air Force
Department of the Interior
Bureau of Indian Affairs
Environmental Protection Agency
Fish and Wildlife Service
National Park Service

STATE AGENCIES

Office of the Governor, Nevada
Nevada State Clearinghouse
(15 copies for distribution to State Agencies)
Nevada Department of Wildlife
Nevada Division of Forestry
Nevada State Department of Agriculture

LOCAL AGENCIES

Eureka County Commissioners
Lander County Commissioners
Nye County Commissioners

UNIVERSITY OF NEVADA

Max C. Fleischmann College of Agriculture Cooperative Extension Service
Department of Range, Wildlife, and Forestry
Division of Animal Science

NEVADA STATE LEGISLATORS

Norman Glaser
John Marvel

OTHERS

American Bashkir Curley Register
American Horse Protection Association, Inc.
American Humane Society
American Wild Mustang and Burro Foundation
Animal Protection Institute
California Association of 4WD Clubs Inc.
Commission for the Preservation of Wild Horses
Grazing permit holders within the Shoshone-Eureka Resource Area
Humane Society in Southern Nevada
International Society for the Protection of Mustangs and Burros
Mountain States Legal Foundation
National Mustang Association, Inc.
National Wild Horse Association
Nationwide Forest Planning Clearinghouse
Natural Resources Defense Council
Nevada Cattlemen's Association
Nevada Federation of Animal Protection Organization
Nevada Humane Society
Nevada Outdoor Recreation Association/ National Public Lands Task Force
Nevada Wildlife Federation
Private citizens who have participated in the planning process
Private citizens who have requested a copy of the plan
Public Lands Council
Save the Mustangs
Sierra Club
U.S. Humane Society
Wilderness Society
Wild Horse Organized Assistance
Wildlife Society, Nevada Chapter

A public meeting was held in Battle Mountain on March 10, 1987. No members of the public attended. A second meeting was held in Eureka on March 11. It was attended by one member of the public. A third meeting was held in Reno on March 12 and was attended by two members of the public, one of whom made an oral statement. On April 1, the Battle Mountain District met with personnel of Region 2 of the Nevada Department of Wildlife in Elko. In addition to the Testimony received at the public meetings, five comment letters were received during the 90 day comment period.

Availability of Proposed RMP Amendment

The Proposed RMP Amendment and Final EIS will be sent to those who received copies of the draft document and all who commented on the draft. A Federal Register notice and an areawide news release will also be used to inform the public of the availability of the Proposed RMP Amendment. Copies of the Proposed Amendment and Final EIS will be available for review at the following BLM offices and public libraries:

BUREAU OF LAND MANAGEMENT OFFICES

Nevada State Office
850 Harvard Way
P.O. Box 12000
Reno, Nevada 89502

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

Carson City District Office
1525 Hot Springs Roads, Suite 300
Carson City, Nevada 89701

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

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

Las Vegas District Office
P.O. Box 26569
Las Vegas, Nevada 89126

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

PUBLIC LIBRARIES

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

Elko County Library
730 Court
Elko, Nevada 89801

Eureka Branch Library
P.O. Box 21
Eureka, Nevada 89316

Goldfield Public Library
Goldfield, Nevada 89013

Lander County Library
Battle Mountain, Nevada 89820

Mineral Bounty Public Library
P.O. Box 1397
Hawthorne, Nevada 89415

Nevada State Library
Capitol Complex
Carson City, Nevada 89710

Nye County Library
P.O. Box 593
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 89557

Washoe County Library
P.O. Box 2151
Reno, Nevada 89505

White Pine County Library
Courthouse Plaza
Ely, Nevada 89301

Introduction to Public Comments and Responses

All written and oral comments on the Draft RMP Amendment 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 Amendment have been incorporated into the Revision and Errata Section of this document.

Comment Letters and Responses

All letters received have been reprinted. Comments responded to are indicated by number.

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

RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

March 25, 1987

Terry Plummer, District Manager
Attn: Shoshone-Eureka Amendment
Bureau of Land Management
P.O. Box 1420
Battle Mountain, Nevada 89820

Dear Terry:

Our involvement in the Shoshone-Eureka RMP/EIS has now spanned several years and we continue to appreciate your commitment to involve us in the planning process. We continue to maintain a high level of interest in this RMP/EIS and we hope our input will help emphasize the need for the Bureau to provide the resources and manpower for the actual implementation of RMP objectives. We strongly believe that the Shoshone-Eureka Resource Area has a tremendous potential for enhancement of wildlife resources values. An increased emphasis and commitment to progressive multiple use land management will not only promote long term stability to the livestock industry but will benefit wildlife resources, which can in itself provide a viable economic opportunity.

1-1 Page 1-2: We don't feel the amendment will "balance" livestock grazing use and wildlife habitat needs, but will be a step toward achieving some balance. We suggest that reference to this "balance" be deleted.

1-2 Page 1-3: What is meant by the statement, "special attention will be given to socio-economic impacts upon local communities"? Will this special attention at any time preclude or supersede the stated management objectives and actions?

Where monitoring data does demonstrate the need for livestock adjustments, will it actually be accomplished despite criteria which states "special attention will be given to socio-economic impacts upon local communities" and "the economic health and stability of the livestock industry will be considered".

Page 2-7: We strongly support and will recommend strict adherence to the proposed amendment objectives for both short and long term goals for wildlife habitat improvement. We do plan to monitor very closely the attainment of short and long term objectives for improvement of aquatic and riparian habitat.

1-3 For the proposed amendment, we recommend that in addition to the stated short and long term objectives for aquatic and riparian habitat, that you include an objective that the remaining areas not be allowed to decline in condition.

Page 3-1: We recognize the shift in acreage of riparian habitat in various condition classes as being more reflective of actual condition. It is probably inconsequential whether the riparian areas are rated fair or poor, as both condition ratings are recognized as being far below desirable levels to meet wildlife habitat requirements. As resource managers we should not accept any condition below good.

1-4 Table 3.2: Was the acreage of terrestrial big game habitat taken from current Nevada Department of Wildlife big game distribution maps? If not, these figures will need to be adjusted.

It is also somewhat difficult to accept that only 4% of the terrestrial big game habitat is in poor condition and that 31% is in good or better condition. We were also surprised that in the Austin allotment there were no acres rated in poor condition.

1-5 Page 4-2: The statement that continuous deferred grazing in the spring would be detrimental to deer habitat is a false assumption in the Resource Area. If all habitat was in good to excellent condition this may be a factor, but under current conditions we would welcome all the spring deferment we can get.

1-6 Possibly the statement "overall, the cumulative impacts of range improvement projects would be beneficial to wildlife" could be reworded to say; cumulative impacts of range improvements could be beneficial to wildlife if the project is properly designed, areas of wildlife conflict are avoided, seedings are managed to maintain a diversity of grass, forbs and browse and projects are integrated with proper grazing adjustments and management systems."

1-7 Page 4-4: It is stated that "51.3 miles of unprotected aquatic habitat would remain static or decline". It is our understanding that the current Bureau's Riparian Area Management Policy does not allow for declining riparian condition.

Page 4-5: The positive aspects of rest may not outweigh increased utilization in the grazed years, particularly in regard to aquatic fishery habitat.

Probably no grazing system will improve range condition if stocking levels are not adjusted to carrying capacity. We believe that proper stocking levels, backed by a range monitoring program, are a prerequisite of any grazing program. Any increase in AUM's should be backed by the same degree of monitoring as would a decrease in AUM's.

1-8 What is meant by the statement, "the addition of 17,675 acres of vegetation manipulation"? In addition to what? Isn't 17,765 the total amount identified for the RMP?

1-9 In regard to the prioritization of 1 allotments for implementation of AMP's, we continue to recommend that priority listing we have established previously.

That listing was established in a November 4, 1985, letter to Ed Spang. Our priority listing was as follows:

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

We again addressed prioritization in a July 17, 1986, letter to Neil Talbot. We presented the same listing as above and provided justification.

That list assumed that Roberts Mountain was already implemented, as Three Bar was just a unit in Roberts and not a separate allotment.

We recommend placing Gilbert Creek, Seven Mile and Diamond Springs as a long term rather than a short term objective. These would be replaced by Simpson Park, Underwood and Santa Fe. I-9

The Department remains committed to supporting a land use plan that will provide both short and long term improvement, not only to wildlife habitat but also to overall ecological condition. This amendment does provide a better foundation for development of allotment management plans which will be the initial step toward overall ecological improvement. We emphasize the importance of monitoring and request that the Resource Area develop a solid monitoring program on all "I" allotments. Only through monitoring can the Bureau make the necessary adjustments in order to bring stocking levels in line with actual carrying capacity. Through the next several years we will be closely following the achievement of the short and long term wildlife habitat objectives. Hopefully, these objectives will form the basis for increased manpower and funding for attainment during the stated time frames.

If you have any questions or comments regarding our input, please feel free to contact us.

Sincerely,

William A. Molini

William A. Molini
Director

DE/jg

RESPONSES TO NEVADA DEPARTMENT OF WILDLIFE'S LETTER

1-1 Manage was substituted for balance. (See Revisions and Errata, Chapter 1)

1-2 "Special attention" has been deleted and the statement changed to say, "Consideration will be given to the socio-economic impacts upon the local community." The economic health and stability of the livestock industry could affect both the degree and/or the timing of proposed changes or adjustments. However, the basic short and long term objectives will be the primary considerations. (See Revisions and Errata, Chapter 1)

1-3 The Riparian Area Management Policy states, "The Bureau will, to the extent practical, achieve riparian area improvement and maintenance objectives through the management of existing uses whenever feasible." We feel the unprotected riparian/aquatic habitat would remain static or decline. This is consistent with the Riparian Area Management Policy.

1-4 The acreages for Terrestrial Big Game Habitat are based on measurements of the Habitat Management Plan areas displayed on the Wildlife Management Map (page 3-4) of the Draft Amendment, which correspond with the Nevada Department of Wildlife key use areas for big game.

There are relatively few studies to determine big game habitat condition or trend, and therefore big game habitat conditions in the Austin Allotment were estimated based on the professional judgment of the Shoshone-Eureka Resource Area staff. These estimates will be updated when adequate monitoring information is collected to more precisely define condition and trends.

1-5 Under extended use, the statement on page 4-2 of the Draft Amendment is correct, however if current conditions are unsatisfactory, continuous deferment could be beneficial to reach satisfactory conditions.

1-6 The statement on page 4-2 of the Draft Amendment implies projects will be properly designed and integrated in a management system intended to achieve the RMP objectives. Your suggested qualification is covered by Standard Operating Procedures on page 2-35 through 2-37 of the Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement.

1-7 See Response 1-3.

1-8 The 17,675 acres of vegetation manipulation is in addition to the fences and water developments sited in the paragraph above. The word "addition" is changed to "development" as explained on page 10, Chapter 4, fourth paragraph of this document.

1-9 The Shoshone-Eureka Resource Area has made a strong commitment to improve wildlife habitat, as demonstrated in the Shoshone-Eureka RMP/ROD and this Proposed Amendment. The Bureau is, however, a multiple use agency and must consider more than wildlife habitat values. Wildlife habitat values and conflicts with other uses are weighed along with other values, uses and conflicts according to the Categorization Criteria listed in Appendix A of the Draft Amendment. When all the information is viewed together, the allotments are categorized and placed in priority order. The recategorization of allotments as shown in Appendix A of the Draft Amendment displays the results of the most recent assessment.

The Gilbert Creek Allotment is primarily a winter use area important for livestock and wild horses. The importance of this allotment for grazing, coupled with unsatisfactory conditions and trends, and controversy between competing uses warrants intensive monitoring and adjustments in grazing use. In addition, the Gilbert Creek Allotment is grazed as part of a year-round livestock operation in conjunction with the adjoining Austin Allotment. The Austin Allotment is also a high priority "I" category allotment and it is logical to handle both the Austin and Gilbert Creek Allotments at the same time.

The Seven-Mile Allotment also has important winter forage (winterfat and budsage) for livestock and wild horses. The value of this winter forage along with unsatisfactory condition and trend warrants monitoring and implementation of more intensive grazing management.

The Diamond Springs Allotment Management Plan is in need of revision. Although the permittee has not applied for livestock use in the past couple of years, it is likely this will not continue much longer. The Bureau's investment of time and money on this allotment carries a commitment to protect this investment and ensure the grazing system operates to achieve the land use plan objectives.

P. O. Box [illegible]
Minneapolis, Minn. [illegible]

7 April 1989.

Bureau of Land Management
P.O. Box 1420
Battle Mountain, Nevada 89820

Dear Sirs;

Please accept my comments, as follows, concerning

Draft Shoshone - Eureka Resource Management Plan Amendment

I am acquainted with the Shoshone - Eureka Resource Area and conclude that such area contains outstanding wilderness, biological, cultural and scenic resources of certain national significance.

The Shoshone - Eureka Resource Area contains unique, varied and essentially fragile wildlife habitat that must be properly managed if it is to survive. And so that it may survive such wildlife habitat must be permanently managed as a permanent wildlife habitat preserve.

Livestock grazing on this Resource Area has had a very negative impact on its wildlife habitat. With such grazing decimating a significant portion of this area's wildlife habitat, as well as, decimating most of this area's range.

2-1 I propose that livestock grazing be subsequent to the needs of wildlife - wildlife habitat, with a very significant reduction of livestock grazing to be implemented at this time, and to totally eliminate livestock grazing on most of this Resource Area so as to enhance wildlife habitat and to restore the range resource.

To manage, thus, this Shoshone - Eureka Resource Area as a wildlife habitat preserve, including some 4,425,000 acres, so as to preserve this area's wildlife habitat - biological resources as to [illegible] man, and all life.

Sincerely,

John R. Swanson.

RESPONSE TO MR. JOHN R. SWANSON'S LETTER

2-1 The Bureau is committed to "multiple use". Livestock, wild horses, and wildlife are compatible uses when proper stocking rates, seasons-of-use and other grazing management practices are implemented to achieve the Shoshone-Eureka Land Use Plan objectives. This is the goal of this amendment.

RESOURCE CONCEPTS INC.
ENGINEERING • ECONOMICS
RESOURCE PLANNING
340 N MINNESOTA ST. • CARSON CITY, NEVADA 89701 • (702) 883-1600

April 13, 1987

ATTN: Shoshone-Eureka Amendment
Terry Plummer, District Manager
Post Office Box 1420
Battle Mountain, Nevada 89820

RE: N-6 State Grazing Board comments to Shoshone-Eureka (S-E) RMP Amendment

Dear Mr. Plummer:

The following comments to the subject document are provided by Resource Concepts, Inc, (RCI) on behalf of the N-6 State Grazing Board. RCI is presently providing consulting services to the N-6 Board.

Unfortunately these comments are somewhat repetitive of our previous comments submitted to BLM and found in the S-E RMP Final.

(1) The N-6 Board would like explanation as to how the streams survey carried out and used as a basis for much of your proposed actions has any relevance to potential ecological condition for the riparian plant community. 3-1

As we understand the methodology used in the streams survey the condition classes are a reflection of a streams ability to support a viable fishery and has nothing to do with ecological potential for the vegetation adjacent to the stream. Yet it seems that the condition classes are being applies in the survey to reflect condition of the entire stream zone as opposed to <u>just</u> the instream conditions. Also where is the expertise garnered to assess the vegetation condition. Our experience has shown through field review that a "one point in time" survey may in fact demonstrate a close grazing use problem which BLM technical staff often times have improperly labeled as poor or fair condition. Ecological condition is determined by establishing the presence or absence of desirable plants in the plant community and has nothing to do with utilization. Heavy grazing use is only a symptom of a problem which may ultimately effect ecological condition.

(2) Page A-2 states that "changes in big game habitat condition and trend parallel changes in ecological condition and trend". This statement infers that

3-2 improved range condition would result in improved big game habitat. This statement is not necessarily true. The S-E staff, in response 8-4 of the Final S-E RMP, indicates that this line of reasoning is not reasonable...Parameters that are considered in determining habitat condition...These parameters are not necessarily related to site productivity.

Often it is assumed it is best to manage the range for the highest ecological conditions...This however, is not always the case..." Apparently the S-E has contradicted itself in the Final S-E RMP and the Draft S-E RMP Amendment. Which line of reasoning is correct?

This point is significant, since partial justification of the proposed amendment is increased acreage of improved big game habitat condition. On one hand BLM (in the Amendment) is stating that improved big game conditions is correlated to improved ecological condition, on the other hand BLM (in Final RMP) is stating that there is not necessarily a correlation. If in fact there is no correlation, then the BLM method for projecting improved big game habitat is invalid and cannot be used to support the purposed alternative.

For example, mule deer are generally considered sub climax species or mid succession species, particularly in Nevada. Under the affected environment, mule deer have adequate habitat conditions right now. Improving ecological condition may in fact have adverse affects to deer. The contention is supported by the fact that 1985-1986 mule deer numbers approached the all time high in Nevada, under the existing habitat conditions. NDOW (1986) states "The present population is similar in magnitude to past populations levels experienced during the peak years. The resource is now larger than needed to safely accommodate present expressed resident hunter demand." If numbers currently approach or

3-3 exceed reasonable numbers, it is illogical to assume that habitat is in some way deficient.

Page 109 of S-E Final RMP, states that population of deer (1982 population) was assumed to remain static under the "No Action". Obviously this assumption was incorrect. The fact that deer numbers are approaching an all time high should be brought out in the S-E Amendments affected environment.

(3) AMPs are projected to increase forage production by 10% through assumption, and also improve forage condition. However, the S-E Resource Area has implemented several AMPs in the past, and there has been no allocated increased AUMs nor any indication that range condition has improved. It would appear that the results of past AMPs within the S-E Resource Area would be a more valid indicator of increased forage and improved range condition than the process of educated guesses as portrayed in the Amendment.

3-4

Table S-1, page 5-3 of the S-E Draft amendment provides a comparative review of the environmental consequences of the alternatives by affected environment component. RCI would suggest that this table is likely highly flawed due to many of the aforementioned items. It is unfortunate that charts are constructed to demonstrate whatever is desired without the benefit of sound supporting data. Each section of the table has information which can be contested when viewed by inexperienced but concerned members of the public. Information of this nature can only present the basis for more concern rather than sound resource management.

3-5

It is the hope of the N-6 Board that BLM will closely evaluate the basis for the proposed amendment and make the decision based upon factual, supportable, data.

Sincerely,

John L. McLain
Certified Range Management Consultant

JLM:md.N6.PLUM0413.LTR

RESOURCE CONCEPTS INC.
340 N. Minnesota • Carson City, Nevada 89701 • (702) 882-1600

RESPONSES TO RESOURCE CONCEPTS, INC. LETTER

3-1 As stated in Appendix C of the Draft Amendment, stream surveys measure 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.

In addition, the degree of utilization over time can be a factor causing changes in riparian conditions and therefore indicative of existing satisfactory/unsatisfactory conditions.

3-2 Changes in ecological condition and trend do not always parallel changes in big game habitat condition, but there is some relationship particularly in the mid-range of the classes. Most of the improvement in big game habitat, based on the criteria in Appendix A of the Draft Amendment, would be to fair and good condition classes. Although we recognize that other parameters are considered in rating big game habitat, as described on page 107 of the Shoshone-Eureka RMP/FEIS, it is sufficient to project changes in condition and trend based on the criteria in Appendix A of the Draft Amendment. Changes to existing big game habitat condition and trend, as well as projections for improvement in habitat, will be updated as sufficient monitoring data is collected.

3-3 There is not always a readily definable relationship between vegetation condition and population levels. Population dynamics are influenced by many variables of which vegetation is only one part.

3-4 It is appropriate to analyze the impact of the proposed action as it relates to livestock forage or change in forage over the long-term period. Please refer to the Draft Shoshone-Eureka Management Plan and Environmental Impact Statement page 4-1, paragraph (6) for the assumptions used in the vegetation impact analysis. Because of variations between allotments, use of the data from a specific AMP is only one consideration when selecting a general assumption for the entire Shoshone-Eureka Resource Area. During activity planning, estimates can be more specifically refined on a case-by-case basis.

3-5 The Table S-1 provides a comparative review of the environmental consequences based on the best available information. Since both alternatives are measured using the same criteria, the relative differences between alternatives does provide a useful guide in assessing the difference in impacts. Changes to the data will be made as additional information is collected.

BUREAU OF LAND MANAGEMENT
BATTLE MOUNTAIN DISTRICT OFFICE
BATTLE MOUNTAIN, NEVADA

RESOURCE MANAGEMENT PLAN AMENDMENT....COMMENTS

We are more in favor of the Draft CRMP than we are the amended version. Though we feel that much more water development and seeding could be done than is proposed under either one.

4-1 We can't envision where the additional funding or manpower would come from for your proposed amendment actions when you have had to cancel such ongoing projects as 1987 Road Maintenance for lack of funds.

In 1986 Rocano allotment developed an AMP and completed and signed CRMP plan which shows more range improvements in short term category...such as seeding in 1986 which BLM has not acted upon. We were told that having AMP & CRMP plans completed and by contributing much of the work ourselves, that we would improve our position as to getting much needed range improvements such as seedings, fences and water improvements, but it seems that we have have been shifted to long term improvement instead. In 1985-86, we completed 7 reservoirs entirely at our own expense and in summer of 1986 ask permission to do 5 more, but havent heard a word from BLM on these or the 1200 acre seeding that was to be accomplished in 1986. If we can't get BLM clearance on the projects that are proposed on CRMP, we can't keep current on projects that are needed to bring our range to a condition that warrants use of our active AUMS.

4-2 We don't feel that your proposed action alternative is fair to livestock grazing as it directs most of the range improvements to riparian areas which show very little benefit to livestock operator. If these areas are in need of such extensive work, it should be funded in large part by the ones that benefit the Wildlife groups and Nevada Dept of Wildlife. (Have you forgotten where the range improvement dollars come from??? livestock grazing fees.)

Improving habitat for shore birds in Northe Diamond valley on BLM property will be quite hard as runoff is intermittent and tends to evaporate quickly (2-11).

4-3 Your assumption that livestock operations run at 43% profit is quite false. p (4-7). (I might suggest that the people in your office subscribe to local farm and ranch magazines so you can be abreast of what is going on in the livestock industry.) One reason you are short on funds is that the majority of the livestock people have gone broke and are no longer able to pay the fees you use.

It appears that in the Roberts Mountain Area the streambed habitat to be improved would be the same under either alternative but more pipelines, troughs and seedings would be
4-4 accomplished under no action alternative. The livestock operator had agreed to partialy finance these projects. Since part of the fencing was in conjunction with the seedings, it seems as though all of this (fencing) would not be necessary under the proposed amendment. In this case it appears that the range improvement funds would be more widely spent in cooperation with the permittie with more AUMS realized both in long and short terms, with the no action alternative.

EXAMPLE.....

ORESTS MOUNTAIN IMP 3 BAR ALOTMENTS

5 year average Proposed $19407 No Action $21695

I also beleive that wildlife groups should help with the streambank improvement as this will decrease active use in short term and not greatly increase it in long term, having very little material benfit for the range improvement dollars spent.

4-5 A large part of the erosion that is shown along the the 3 creeks in 3 bar Roberts Mountain are are caused by abnormally high snowmelt that triggered massive runoff, resulting in erosion of silty streambanks. This is more that likely true in the other area also.

4-6 In fencing some of the allotments, as they are now staked, existing troughs will be fenced inside the enclosure, has this been taken into consideration when there will be less troughs and pipelines under the proposed amendment than there would have been originally?

Many of the figures used in this study are out dated (1977) As on the Roberts allotment all of these projects are essentially complete but the BLM has signed a CRMP plan specifying more projects to be completed (many in 1986). In essence we feel that the whole Resorce area is in need of more range improvements and all the the proposed amendment would accomplish would be costly, time consuming and negative.

Yours truly,

James W. Workman

RESPONSES TO MR. JAMES W. BUFFHAM'S LETTER

4-1 It is assumed that funding and manpower will be available to perform the work required.

4-2 It is BLM Policy that range betterment funds must be used for on-the-ground rehabilitation, protection, and improvement of the public lands that will arrest rangeland deterioration and improve forage condition with resulting benefits to wildlife, watershed protection, and livestock production." The Proposed Amendment provides for benefits to wildlife, watershed protection and livestock production. Therefore, we feel the Proposed Amendment, as written, is in accordance with policy.

The Northern Diamond Valley Habitat Management Plan area is not dependent on intermittent runoff, but is sustained by artesian water flows.

4-3 In order to provide consistency and facilitate comparison with previously analyzed alternatives, the economic analysis was based on data presented in the Draft Shoshone-Eureka RMP/EIS. Typical ranch budgets are displayed on page 3-27 of that document. As the ranch budgets make clear, net ranch income, while approximately 43 percent of total returns, does not represent profit. Because of the wide variability among individual ranch operations, net ranch income was defined as gross income (sales) minus cash costs and depreciation. Net ranch income, then, represents the funds available to service long-term debts on land and capitol, to provide income to family labor, and to provide a return to risk and management. You may note that, in each budget, total costs displayed for the "typical" operation are in excess of total returns.

4-4 The range improvements listed in Appendix A under the Proposed Amendment are limited to those the Bureau estimates could be funded with Range Betterment Funds only. Private contributions of labor and/or materials were not included because the Bureau could not plan on contributions over which it has no control. A decline in the number of range improvements per allotment (from the No Action Alternative) results when a finite amount of dollars are spread over a larger number of allotments (Proposed Amendment).

4-5 During high peak runoff events, some stream channel cutting is expected. A healthy stream channel will repair itself relatively quickly, maintaining a dynamic equilibrium over time. A healthy stream is characterized by the presence of sufficient soil holding vegetation along the banks.

Some streams have enough rock in their channels to minimize the cutting action of the water, allowing for a stable stream channel. However, vegetation is one of the more significant factors which can be reasonably managed.

4-6 If existing water troughs are fenced within proposed riparian protection fences and water is not available nearby, an alternate source of water may be provided for livestock outside the protection area.

SIERRA CLUB

Toiyabe Chapter — Nevada and Eastern California
P.O. Box 8096, Reno, Nevada 89507

Oral Comments
Shoshone-Eureka Resource Management Plan Amendment
Public Hearing 3/12/87 Reno, NV

by Rose Strickland, Chair
Toiyabe Chapter of the Sierra Club

I. Stated purpose of the Plan Amendment
- increase the number of allotments in the I category

II. Resulting changes in the RMP
- an increase in AMPs

- an increase in livestock numbers

- an increase in range improvements to increase livestock forage

- indirect effects on the environment
  - improvement in range conditions
  - improvement in riparian and aquatic habitat
  - improvement in wildlife habitat

III. Amendment is faulty

5-1 A. no increased commitment to monitoring as required by the I categorization of 28 allotments

B. faulty assumptions

- funding will not be available. EIS should have considered alternatives with funding at current levels
5-2 and at five year average funding levels.

- plan will not be implemented on schedule. Current staff is inadequate to do increased monitoring, develop or update 28 AMPs, and implement extensive livestock
5-3 range improvements. Is monitoring current for existing
I allotments? Why haven't AMPs been developed/revised
5-4 for existing I allotments? Will range improvements get the highest priority for overworked staff?

- no adjustments based on monitoring have occurred yet. There is absolutely no guarantee that adjustments will
5-5 ever be made. In fact, in Appendix A, pp. 7-9, a table shows that the only adjustments to be made will be up! Have the results of monitoring already been predetermined?

- data which the Bureau considers inadequate on which

to base forage allocations is adequate for "planning purposes" remains a patently ridiculous position.

C. no actions are described in the Amendment to directly improve riparian or aquatic habitat (Table 2-2). Range improvements are apparently included to increase livestock forage and livestock numbers. 5-6

D. the MIC categorization rationale remains essentially flawed because M allotments are penalized for being in good condition by the withholding of range improvements, monitoring, and other BLM attention, while C allotments in unsatisfactory condition are written off by the Bureau as "umimprovable." The Sierra Club continues to oppose this system which rewards or ignores unsatisfactory management and penalizes good management of the public rangelands. 5-7

E. document seems to be based on a best case analysis. Projections are accurate only if all AMPs are written, all range improvements are developed, all management plans and range improvements are 100% successful, rainfall is normal to above-average, etc. It is our understanding that in the absence of adequate information, NEPA and CEQ guidelines require the managing agency to do a worst case analysis or analyze a range of alternatives which are based on levels between the worst and best cases possible using the best available information. This document fails to meet these requirements. 5-8

IV. Suggestions for improvement in the Amendment/EIS

A. Analyze alternatives which are more realistic in terms of available budget and staff to implement the RMP. 5-9

B. Emphasize monitoring in all I allotments - 1st priority of field staff. 5-10

C. Specify riparian and aquatic habitat improvement projects and priortize by allotment just as Table 2-2 does for livestock range improvements. 5-11

D. Add a standard operating procedure prohibiting the implentation of range improvements in an allotment until an AMP is developed or updated to improve overall livestock grazing management. 5-12

E. Allocate any increased forage to wildlife and wildhorses. 90% to livestock is not an equitable allocation of public rangeland forage. 5-13

V. More detailed comments will be submitted by the April deadline.

RESPONSES TO THE SIERRA CLUB'S ORAL COMMENTS

5-1 It is Bureau policy to monitor all "I" category allotments. The Draft Shoshone-Eureka Amendment (pages 2-7 and 2-9) addressed this as both a short term and a long term management action.

5-2 See response 4-1.

5-3 Monitoring has been initiated on all "I" allotments. Also see response 5-1.

5-4 AMPs are currently being developed on several "I" allotments according to the allotment categorization priorities. Generally, range improvements will not be implemented until an AMP is approved. Also see response 5-12.

5-5 The results of monitoring have not been predetermined. See response 3-4.

5-6 See paragraph 4, right hand column of page 2-7 of the Shoshone-Eureka Draft Amendment "Actions could include but are not limited to...." The range improvements, as shown on Table 2-2, include projects for riparian/aquatic habitat improvement.

5-7 Selective management is a Bureauwide categorization process designed to help Bureau personnel implement the rangeland management program and assign management priorities among livestock grazing allotments or groups of allotments within a planning area.

Selective management recognizes that: (1) An allotment's (or area's) resource characteristics, including its potential for improvement, can be identified; (2) these characteristics define the allotment's management needs and imply a reasonable intensity of management efforts; and (3) limited management capabilities are best invested when the priority and intensity of management actions for and among allotments respond to their management needs and potential for improvement. Potential for improvement is the capacity of an allotment to produce a positive return on investments within a reasonable time period. Positive return can be viewed in terms of increased resource production or resolution of serious resource use conflicts.

5-8 It is the Bureau of Land Management's position that this document meets NEPA and CEQ requirements and that monitoring and improved grazing management will be implemented as scheduled to meet the stated objectives. With the revision of CEQ regulations (July 1, 1986), a worst case analysis is no longer required. The requirement for worst case analysis previously appeared in 1502.22(b)--with the revision, that requirement was also deleted.

5-9 See response 4-1.

5-10 See response 5-1.

RESPONSES TO THE SIERRA CLUB'S ORAL COMMENTS (Continued)

5-11 See response 1-9. Also, Tables 2-2 and 2-3 include projects needed to improve the riparian and aquatic habitat.

5-12 With few exceptions, range improvements will not be implemented until the activity plan is approved. Exceptions may be permitted on a case-by-case basis when supported by sufficient analysis indicating consistency with land use plan objectives and priorities.

5-13 The projected increase in long term livestock AUMs is based on the same criteria used in the Shoshone-Eureka RMP/DEIS and therefore consistent with previous analysis. Also see response 3-4.

Shoshone-Eureka RMP Amendment Input
By Craig C. Downer, Mar. 30, 1987

March 30, 1987

Mr. Terry Plummer, District Manager
Attn: Shoshone-Eureka Amendment
Bureau of Land Management
P.O. Box 1420
Battle Mountain, NV 89820

Dear Mr. Plummer:

I have the following comments concerning the draft resource management plan amendment:

6-1 p. S-1: Increase in managed livestock use to 262,500 AUMs is arbitrary and not qualified. This increase does not adequately accommodate other multiple uses on public lands.

I object to lumping of wild horses with livestock. The wild horses should be treated similarly to wildlife, integral parts of the natural ecosystems according to the Wild Horse Act. p. S-3: It is hard for me to imagine how you will improve wildlife habitat while increasing livestock on already overgrazed lands, i.e. going from a short term of 239,717 AUMs to a long term of 262,500, increasing fencing, interfering with natural movement patterns, increasing livestock monopolization of public waters. This just doesn't make sense.

6-2 Ch. 1. p. 1-2: You need more alternatives than just these 2. This is an over simplification which does not provide for an adequate array of choices. I suggest you prepare a conservation alternative with elements of wildlife, wilderness, wild horses and naturalistic recreation given top priority. This is what most of the U.S. public would like to see; and it is they who own the public lands.

Your statement: "Public land areas will host multiple uses, except where a single use is in the public interest" is vague and arbitrary and provides an enormous loophole for domination of the livestock industry.

6-3 p. 1-3: Add: "The maintenance of thriving and viable wild horse herds will be assured."

6-4 Ch. 2: p. 2-1: Why are you proposing this long term livestock increase to 262,500? How are you justifying this?

6-5 p. 2-7: Please explain and set forth the proportion of reduction: livestock vis-a-vis wild horses, rather than just lumping together the two. How do I know that wild horses aren't taking all or practically all of planned reductions, which clearly appears to be the case since you are planning for long term increase in livestock numbers?

The BLM should be concerned about the welfare of the entire wildlife community, not just big game.

Short-Term Management Actions: 1) Please note that the term "active" in reference to preference is misleading when it is in fact sometimes not active or being used.

6-6 2) Please assess the current equitability of numbers of livestock vis-a vis wild horses and allow for upward adjustments in herds where the wild horse populations are not viable. The herd size should be around 500 to be viable.

p. 2-8: Table 2-2: No specific breakdown on wild horses is given. This should be provided.

The substantial increase in livestock usage probably does not include wild horses, to which I object. I object to any increase in livestock. I favor a substantial decrease and elimination where not economically feasible, or ecologically suitable, which is much of this area.

6-7 Miles of fence: I object to the great increase in fencing. This will restrict the freedom of the public domain, interfere with wild horse and other wildlife migrations and movement patterns and grazing dispersal and convert the public lands to monopolized livestock production lands. Acres of vegetation manipulation: I object: This is another example of the federal government allowing the monopolization of public lands by the livestock industry. This is way too much and will desolate wildlife habitat. It would be better to allow natural succession after the removal of livestock grazing pressure in areas needing revitalization.

p. 2-9: Please make sure that wild horses and wildlife as well as livestock can take advantage of these improvements.

These developments may also have the effect of spreading overgrazing and livestock domination to less disturbed areas.

Make sure that fencing and cross-fencing do not arbitrarily restrict the movement patterns and migration of wild horses and other large wildlife, as has happened elsewhere in Nevada, e.g. Owyhee resulting in grusome deaths of wild horses blocked from water or Granite Hills, resulting in starvation of 100's of wild horses. I fully expect that such thwarting of wild horses survival are in fact being caused by your fences.

I object to the manipulation of 7,500 acres of vegetation. It would be better to protect these areas and to reduce livestock grazing on them.

6-8 In summary, the proposed alternative is in effect: livestock maximization, and it not justified given the poor and deteriorating range conditions. The BLM needs to put forth a conservation, public interest alternative, including maximization of natural and aesthetic values, including wildlife and wild horse habitat, nature appreciation, and restoration of holistic, ecosystem integrity.

6-9 p. 2-10 Table 2-3: No breakdown on the wild horse population numbers. This should be provided.

6-10 p. 2-11. Regarding the 113 miles of fence, no provision for wild horse or wildlife migration patterns is mentioned. I assume these fences could have disastrous effects on these.

Regarding the improvement of 250 acres of wetland habitat for waterfowl and shore birds in northern Diamond Valley, I favor this. Cattle and sheep should be kept strictly out of this habitat.

6-11 Ch. 3: Affected Environment. p. 3-1: Page 3-5 is not present.

6-12 Table 3-2: More than just Big Game habitat should be considered for public lands! Consider all wildlife!

$40 billion is spent on outdoor recreation each year in the

U.S. This dwarfs any revenue from livestock, which, besides this, loses the U.S. taxpayer many billions of dollars concerning the maintenance of public lands livestock grazing. Season-of-use: This is a useful point on Winterfat. You should ever bear in mind the dynamic interrelationship among plants and animals, producers and consumers, in Nature. It is unwise to try to pin down too tightly their relationship.

6-13 Ch. 4. p. 4-1: I cannot accept that the impacts to wild horses and burros, visual resources, wilderness, recreation and wildlife are insignificant. This is a blank statement! For example: How many wild horses will remain? Will this represent a viable number. None of this information was presented! As if they didn't exist!

6-14 p. 4-2: Wildlife Habitat: I object to only big game wildlife being considered. This does not reflect the public's interest in other species on public land.

These is no mention of wild horses, a clear oversight.

Wild horses could complement deer by eating coarse perennial vegetation. Why are they not then mentioned in

6-15 this regard!

Again, there is no mention of fences, of impairment to wild horse movement. This shows an ignorance of the wild horse interest which is contrary to the law!

p. 4-4: I favor the measures taken to protect riparian habitat.

You mention wild horse use as a detriment to riparian habitat. Wild horses do not generally linger at waterholes, but quickly depart, in distinct contrast to the habits of livestock. I have observed how bands of horses rotate use at water holes. They can be forced into a poor situation by restrictive fences and preempted waterholes due to man's activities, however.

Livestock grazing: This shows a clear pro-livestock

6-16 monopoly emphasis. I both object to and resent this as a U.S. citizen and as a world citizen.

6-17 p. 4-5: Vegetation: Improvement for livestock should not be the sole criterion!

p. 4-7: Wildlife Habitat: No discussion of the negative impact to the wild horse population which would surely result due to fences and intensive livestock management: i.e.

6-18 restriction of their natural and free life style. Same can be said of the wildlife. There is also a negative impact to public land recreationists. These are clear oversights!

2. This would constitute an unacceptable decline of the riparian habitat.

p. 4-9: Livestock Grazing: This shows pro-livestock emphasis at the expense of other public values on public lands.

6-19 Vegetation: You are judging only in terms of plants preferred by livestock!

6-20 Ch. 5: p. 5-1: There is a complete lack of any wild horse specialist/advocate. This is a clear oversight! In my humble opinion.

6-21 Ch. 6: p. 6-1: Is the wild horse interest represented on the

Shoshone-Eureka RMP Amendment Input
By Craig C. Downer

Battle Mountain District Advisory Council?

6-22 App. A: A-4: Wild horse interest should have been mentioned as a social-political controvery and interest.

6-23 p. A-5: Better to state it the other way around: "An interdisciplinary team will be used to determine the effect livestock grazing will have on other public land values and to assess its justification based on these other values.

p. A-7: There is no significant difference between the No Action Long-Term and the Proposed Amendment Long Term. This sounds like business as usual, favoring livestock monopoly on public lands. --And to this I strenuously object! You are overlooking so many of the abuses of this industry and so many of the values the public cherishes on their public lands!

6-24 p. A-10: 746.5 miles of fencing is too much with no analysis of how it will affect wild horses and wildlife year-round habitat requirements!

99 cattleguards: Please be sure these cattleguards are not the kind that kill horses, as I have seen only last year on BLM land in Nevada -- a grusome death! There is a regulation providing for this. p. A-11: Dido above.

6-25 App. B: p. B-2: The omission of the wild horse interest is again a glaring oversight. I suggest 10% change as constituting a level of significance, same as for wildlife habitat, in regard to wild horse habitat, in order to be equitable! Please respond to this point.

App. C: Aquatic and Riparian Habitat: p. C-1: I participated in this survey in the summer of 1979 and can testify to the devastation of riparian habitat wrought by livestock alone! I visited Italian, Silver, Boone, and other creeks in the Shoshone-Eureka Resource Area.

I hope the BLM team in this RA and in the District will have the courage to stand up to the abusive livestock industry and to represent the public interest, rather than remaining subserviant to this monster!

Sincerely,

Craig C. Downer

Craig C. Downer
P.O. Box 456
Minden, Nevada 89423

CC: Ed Spang, Nevada BLM Director, Reno.
Dawn Lappin, Pres. WHOA!, Reno, NV.

RESPONSES TO MR. CRAIG C. DOWNER'S LETTER

6-1 See response 5-13. In addition, this RMP Amendment addresses improvement of wildlife habitat and ecological condition in relation to the implementation of more intensive livestock grazing management. Wild horses were not lumped with livestock. As stated on page 5-1 of the Draft Amendment, only the livestock management issue was identified for analysis in this Proposed Amendment. Wild horse management has already been discussed in the Shoshone-Eureka RMP/DEIS and FEIS.

6-2 Since this analysis is considering an amendment to an existing Resource Management Plan (RMP), it is proper to limit the alternatives to the Proposed Amendment and the existing situation, which is the RMP as it was approved in February of 1986. (See also response 6-3.)

6-3 Wild horse management was analyzed in the Draft Shoshone-Eureka RMP/EIS which was made available to the public in June 1983. This Proposed Amendment is restricted to consideration of adding 14 more allotments to the "I" category and the effects of this programs action. (See also response 6-1.)

6-4 See responses 6-1 and 5-13.

6-5 See response 6-1, 6-2 and 6-3. Also, this Amendment does not proposed to change the appropriate management level (AML) for wild horses. The AMLs established in the current RMP remain the same.

6-6 See response 3-4, 6-1, 6-2, and 6-3.

6-7 The following corrective actions have been taken:

A section titled "Wild Horses and Burros" has been added to Chapter 4, Environmental Consequences which discusses the significant impacts of increased fencing and water developments under the Proposed Amendment (see page 9 of this document, Chapter 4, paragraphs 2-5 and second paragraph on page 11).

Range improvements projects, changes in stocking levels and seasons-of-use, etc., are tools used to achieve management objectives. Project proposals will be analyzed according to the standard operating procedures (SOPs) listed on pages 2-35 through 2-37 in the Shoshone-Eureka RMP/DEIS. For example, SOPs numbered 5, 6, and 11 refers to fencing, and vegetation manipulation projects in relation to wild horses. Also see response 6-13.

6-8 See response 6-2.

6-9 See response 6-3.

6-10 See response 6-7.

6-11 Page 3-5 is located in the Draft Shoshone-Eureka RMP/EIS numbered INT DEIS 83-40.

6-12 The Affected Environment discussed in the Shoshone-Eureka RMP/DEIS and supplemented by the Draft Amendment, also includes sage grouse and Lahontan cutthroat trout. Mule deer, antelope, sage grouse and trout are the primary species of concern and it is therefore appropriate to limit considerations to these wildlife.

6-13 The following corrective actions have been taken:

On page 4-1 of the Draft Amendment, the second paragraph in the left column has been changed to delete the words "wild horse and burros" from the list of components not significantly impacted by the Proposed Amendment. (See Revision and Errata, Chapter 4 and Appendices. Also see response 6-7.)

6-14 See response 6-12.

6-15 See response 6-7.

6-16 See response 2-1.

6-17 See response 3-4 and 2-1.

6-18 See response 6-7.

6-19 The vegetation section refers to ecological condition and must not be confused with "livestock forage condition". The difference between ecological condition and livestock forage condition is described on page 3-9 of the Shoshone-Eureka RMP/DEIS.

6-20 See response 6-3.

6-21 Yes, a member of the Battle Mountain District Advisory Council represents wild horses and burros.

6-22 The criterion on "Social-Political Controversy or Interest" does include consideration of a variety of subjects, one of which is wild horses.

6-23 The criterion on "Resource Conflicts" considers more than just livestock grazing and is intended to cover multiple uses.

6-24 See response 6-7.

6-25 See response 6-1.

GPO 785-056/77245