

Letter I1

Dear sirs:

I would like to add my opinion to the plan regarding the Sloan Canyon Conservation Area. I have been a hunter, fisherman, camper, hiker, target shooter, plinker, etc. for almost 50 years. Most of that activity has occurred on public land. I have raised five children and now have seven grandchildren that have shared my love of the outdoors. We all love our public lands and the fact that they are open to allow us to pursue our outdoor interests. Please consider that when you develop your resource management plan. I especially want to address: hunting, target shooting, and plinking. They are honest, wholesome endeavors, even if there are those that disagree with that point of view. I believe our public grounds should be managed to support hunting, target shooting and plinking. I could go on and on about the times that I have been in the outdoors with folks hunting, target shooting and plinking, and the positive results those outings had on all of us. It's sad to see areas closed to those interests because some don't like them. To those folks I would say, fine, if you don't like to hunt, shoot or plink, then don't, but it's not their place to restrict the rest of us.

I am a retired police officer and was one for over 34 years. I can tell you first hand, that the application of the interests I mention and sharing them with others, especially children, only improve public health.

Please do not consider reducing the availability of our lands when you develop the resource management plan and environmental impact statement for the Sloan Canyon Conservation area.

Thank you for your consideration.

Respectfully submitted,

Paul Anderson

Paul Anderson<paulndarcy@sbcglobal.net>

Responses to Letter I1

- I1-1 Comment noted. Outdoor recreation is an important consideration for the management of public lands by the Ely Field Office.
- I1-2 The outdoor activities identified in your comment are recognized by the Ely Field Office as valid uses of the public lands.
- I1-3 Please refer to Response to Comment I1-2.
- I1-4 Comment noted.
- I1-5 This comment is not relevant to the Ely RMP. The Sloan Canyon Conservation Area is not within the Ely planning area. It was a planning effort undertaken by the BLM Las Vegas Field Office and was completed in June 2006.

Letter I2



Fastfreddy5050@cs.com
10/04/2005 11:21 AM

To: elymp@blm.gov
cc:
bcc:
Subject: Draft mamagment plan

I2-1 [

Hi: In regards to your managment plan I feel that BLM lands in the Ely district should be managed as multiple use and all activities that were allowed in the past, especially recreation (hunting, fishing) be allowed to continue. Sincerely, Fred

Responses to Letter I2

I2-1

Please refer to Sections 2.4.15, 3.15, and 4.15 in the Proposed RMP and Final EIS for discussions of Recreation Resources within the Ely RMP decision area. The management actions contained in the Proposed RMP continue to focus on multiple use of resources.

Letter I3

Dear Ely BLM,

Thank you for the opportunity to comment. We commend the BLM for its forward-thinking plan. We support most of the resource management plan, in particular the restoration activities. Nevertheless, there are some areas of the plan that we feel require further attention, addressed below.

- I3-1 2.5.12.2 Lands and Realty - Disposal of Public Lands
The public lands listed for disposal in the Baker area should be located in different areas than those shown in Alternative E. The areas shown are for the most part away from utility corridors and access. In addition, the land disposal area furthest to the south may be in an area that a group of sage grouse recently have been found to use. In 2004 NDOW put radio collars on some of the sage grouse, finding that they use fields on Baker Ranch for part of the year, then cross the sagebrush land to the northeast to their lekking area. If this land is disposed, potential development could impede the success of this population. Land disposal should take place in areas where disposal would serve important public objectives including community expansion or economic development.
- We recommend that the lands for disposal in the Baker area be located around the town of Baker and along Highway 6 & 50. (will send map if comment time extended)
- I3-2 2.5.12.5 Lands and Realty - Corridors
Alternative E should not include designating a new corridor that runs from Lincoln to Elko counties through Spring Valley. If a party desires a right-of-way in the future, it should be decided at that time. Designating a corridor at this time is speculative and would put additional resources at risk.
- I3-3 2.5.13.1 Parameter- Wind and Solar Energy
Limiting locations for renewable energy before they are definitively known will stifle future opportunities. Further studies using anemometers should be conducted before land is designated as wind energy development areas. Locations should be managed on a case-by-case basis.
- I3-4 2.5.5.4 Parameter- Salt Desert Shrub The effect of rodent and ant communities (e.g. ground squirrel burrows and harvester ant mounds) on spreading invasive exotic plants should be discussed.
- I3-5 2.5.6.1 Aquatic Habitat and Fisheries
We congratulate the BLM for moving towards more emphasis on enhancing native fisheries in Alternative E and think that even stronger language supporting native fish and their habitats would be appropriate.
- I3-6 2.5.5.6 Big Game Habitat
We believe that the BLM should make Alternative B its preferred alternative. Alternative E, which provides for managing big game species habitats beyond what natural habitats and water sources would

Responses to Letter I3

- I3-1 In response to this and other similar comments, the lands available for disposal in the Baker area have been revised for the Proposed RMP and Final EIS. Please refer to the revised disposal maps introduced in Section 2.4.12.2 and the revised legal descriptions in Appendix I.
- I3-2 In response to your comment, the text in Section 2.4.6 (Goal) and text in Section 2.4.6.3 of the Proposed RMP and Final EIS have been revised to clarify the discussion of how the BLM would manage big game species habitats.
- I3-3 The Proposed RMP does not designate areas for wind and solar energy development, and the text and map titles in the Proposed RMP and Final EIS have been changed to clarify this. Changes in technology may change the potential for renewable energy development and which areas are suitable. Applications received for wind energy development would be subject to NEPA analysis in coordination with local, state, and other federal agencies.
- I3-4 While the effects of rodents and insects contribute to the spread of plant seeds, these are relatively minor and localized factors in the widespread dispersal of invasive weeds.
- I3-5 Thank you for your comment. The Proposed RMP states that the Ely Field Office would work with the U.S. Fish and Wildlife Service and Nevada Department of Wildlife to enhance native fisheries habitat whenever possible and balance native and nonnative fishery management strategies.
- I3-6 In response to your comment, the text at the beginning of Section 2.4.6 under "Goal" and the text in Section 2.4.6.3 of the Proposed RMP and Final EIS have been revised to clarify the discussion of how the BLM would manage big game species habitats.

Letter I3 Continued

I3-6

support, unbalances the ecosystem and puts added stress on nongame species and forage species.

Please include us on your mailing list for any further correspondence regarding this EIS.

Sincerely,
Craig and Gretchen Baker
P.O. Box 34
Baker, NV 89311

Start your day with Yahoo! - Make it your home page!
<http://www.yahoo.com/r/hs>

Letter I4

November 29, 2005

Bruce Flynn
BLM, Ely Field Office
HC33 Box 33500
Ely, NV 89301

Nov. 27, 2005
Karen Boeger
5055 Wilcox Ranch Road
Reno, NV 89510

Comments: Ely Draft RMP EIS

Thank you for this opportunity to submit comments on your draft RMP. I'm only sorry that I haven't taken more time study this huge document and give you more detailed comments. Please assume that any issue I haven't commented on, I either agree with your proposed alternative or I just don't have the knowledge/expertise to make an informed comment.

1) Vegetation:

*Aspen (2.5.5.2):

I4-1 [The preferred alternative says aspen communities would be managed ("using disturbance") ... this sounds dubious at best, unless that means prescribed fire?

I4-2 [The preferred alternative also is unclear on what is meant by using grazing management as a "common treatment tool" for restoration or rehabilitation. Can it be presumed to mean a restriction of grazing in those areas??? One would hope so.

2) Fish and Wildlife:

*Wildlife Water Developments (2.5.6.3)/ *Great Basin Big Game Habitat (2.5.6.6):

I4-3 [Alt. B should be the preferred alternative because it emphasizes habitat health, which in turn will provide an appropriately healthy game population. Management that is a response to "public demand" is not always the best for the long-term public good.

I4-4 [Control of ATVs would do far more in the long run for healthy game populations and improved hunting opportunities than more and more water developments.

I4-5 [*Great Basin – Big horn sheep:

Responses to Letter I4

I4-1 In response to your comment, various disturbance factors (e.g., fire and thinning) are among the common approaches for stimulating additional regeneration in aspen stands. The text in Section 2.4.5.3 of the Proposed RMP and Final EIS has been revised to clarify the propose management of aspen communities.

I4-2 The use of grazing management as a tool in treatment and rehabilitation of vegetation communities may involve changes in intensity, duration, and periods of grazing or total elimination, if necessary. In most cases, the specific changes in grazing management for a given area would be defined following watershed analysis rather than being addressed specifically in the RMP/EIS.

I4-3 Wildlife habitat health is an overriding theme of all the alternatives analyzed in the Draft RMP and EIS and Proposed RMP and Final EIS. Although the BLM may install artificial wildlife water developments to "Meet the public demands for increased recreational opportunities ..." as stated in Section 2.4.6.7 of the Proposed RMP and Final EIS, that decision must still meet the goal of wildlife habitat management, which is listed at the beginning of Section 2.4.6.

I4-4 Please refer to Section 2.4.14.2 in the Proposed RMP and Final EIS for a discussion of how the BLM plans to manage OHVs.

I4-5 In response to your comment, the text in Table 2.9-1 and in Section 2.4.6.4 of the Proposed RMP and Final EIS has been revised to include the entire Snake Range.

Letter I4 Continued

- 14-5 [The preferred alternative artificially limits big horns to 2 areas. Further, it does not take into account the affect of management on BLM lands adjacent to big horn areas of the NPS.
- 14-6 [3) Special Status Species
- Mohave Desert Scrub Habitat (2.5.7.6.): Alt. B is preferred to E. There must be adequate review and justification for grazing any Mohave Desert lands or lands elsewhere receiving 8" or less of rain per year. Eliminate grazing where grazing cannot be sustained without ecological disruption.
 -
- 4) Cultural Resources
- * (2.5.9.1 through 2.5.9.8:
Historic roads, trails, etc. / Rock Art Sites / Historic town sites, etc./ Historic cemeteries/
Ethnic arboreal narratives / Formative Puebloan sites / Rock shelter and caves
- 14-7 ["Public use" emphasis for these resources will be fraught with problems and leans toward a "build it and they will come" attitude. While existing developed sites should be maintained, in no case should public access be "promoted". Most vandalism and negative impacts can be controlled by limiting public access and/or closing existing motorized routes a significant distance from the resource.
- 14-8 [I oppose any fee sites on general principle. Fees insert a profit motive into public lands decision-making. Dependence on user fees for recreation and/or cultural resource management will damage the BLMs' ability to make objective decisions.
- 5) Lands and realty
- 14-9 [*Disposal of public lands (2.5.12.2): Alt. B is the best for this issue. Not disposing of critical habitat for T&E species or sensitive species is the right thing to do for highest public benefit.
- 14-10 [*Corridor designations (2.5.12.5): Alt. A is best. Additional corridors must not be designated. This is the responsible choice as the majority of White Pine residents have grave concerns about water deportation. It would be irresponsible to make any decision until an expanded water study is complete.
- 14-11 [*Communication sites (2.5.12.6): Alt. B is best. It provides an adaptive management approach by not creating new sites until existing ones are at capacity.
- 14-12 [*Land use authorizations (2.5.12.7): Alt. B again is the best approach. by utilizing authorizations next to existing ones, so as to minimize impacts and not further fragment habitat.
- 6) Travel Management and ORV Use:

Responses to Letter I4

- 14-6 Livestock grazing suitability and the evaluation of grazing use relative to grazing any Mohave Desert lands and the achievement of the standards for rangeland health will be conducted during the term permit renewal process, during watershed analysis, and during grazing use monitoring. Authorizing grazing may be appropriate in certain situations. These are issues that would be considered associated with authorizing any grazing use.
- 14-7 Cultural sites with evidence of public use will be considered for allocation to Public Use. Use of such sites will be limited if monitoring of a site shows a need to protect the resource.
- 14-8 Thank you for expressing your concerns. Fees are an allowable method to maintain facilities for public use. Fee areas are allowed under BLM policy where special management, such as maintenance of facilities for public use, incurs costs that cannot reasonably be funded through the normal budget process.
- 14-9 Please refer to Section 2.4.12.2 in the Proposed RMP and Final EIS for a discussion of disposal of designated critical habitat for threatened or endangered species. Please note that under the Proposed RMP, no such disposal would be allowed.
- 14-10 The Ely Field Office is required to designate corridors through the land use planning process. It is BLM policy to encourage prospective applicants to locate their proposals within corridors. The Proposed RMP states that water pipelines are encouraged to be within designated corridors. Water pipelines could be authorized through the right-of-way process and would not require a designated corridor.
- 14-11 The Proposed RMP encourages co-location of communication sites before rights-of-way for new sites are issued. The Proposed RMP is responsive to the needs of communication for public safety and to accommodate changes in technology.
- 14-12 Please refer to management actions in Section 2.4.12.7 in the Proposed RMP and Final EIS for a discussion of land use authorizations.

Letter I4 Continued

- I4-13 [*Transportation plan (2.5.14.1): Alternative B should be preferred. Recreation and tourism **promotion** must not be the emphasis for road and trail designations.
- I4-14 [Management capabilities, sustainability, minimizing impact to other resources (wildlife, cultural, historical, etc.), minimizing impact to other users (quiet use, traditional hunting, permittees, etc.) should be the guiding principles of any transportation plan as directed in the Executive Orders and CFRs. Statewide BLM ORV Guidelines should be followed when designating routes.
- 7) Recreation:
- I4-15 [• Special Recreation Management areas (2.5.15.1):
- Motorized recreation is not benign. It has more potential to damage land and disrupt traditional uses more than about any other use of public land. Thousands and thousands of miles of roads suitable for ORV use already exist. If use can be kept to designated routes.
- I4-16 [While the concept of designating areas for emphasis of certain types of recreation can help to reduce conflicts, BLM needs to more clearly define just how these areas will be managed. Proposed areas encompass huge acreages. The impacts on wildlife will be significant, especially over time as use increases. What input has there been from NDOW on this alternative? There must be EAs on each proposed area?
- I4-17 [Existing management capabilities are inadequate to manage existing problem areas. Currently there are absurd administrative limits on BLMs capability to enforce regulations. BLM must resist a “build it and they will come” mentality. Build only as needed and as you have the funds, personnel, and administrative ability to properly manage the use.
- I4-18 [One of the proposed motorized areas, the Eagan Crest, contains a high density of springs, which makes it unique and a highly important wildlife habitat, vulnerable to ORV impacts and disturbance. This area must not be designated an ORV area. Recreation must never be emphasized or “promoted” by a public lands agency without established ability to manage for sustainability and non-degradation of the land and resources while minimizing user conflict
- I4-19 [• Special Recreation Permits (2.5.15.2):
- a. The EIS does not make clear just how these ORV recreation management areas differ from the ones proposed in 2.5.15.1. I assume you mean that these will be areas of INTENSIVE (racing, machine challenge, etc.) ORV use??

Responses to Letter I4

- I4-13 In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify criteria that may be used when designating routes in a project-specific transportation plan.
- I4-14 Thank you for your comment. The Proposed RMP has been developed as directed in the BLM Land Use Planning Handbook, current federal regulations, and applicable Executive Orders. Nevada BLM off-highway vehicle guidelines will be utilized by the Ely Field Office.
- I4-15 In response to this and similar comments, the management action in Section 2.4.15.1 of the Proposed RMP and Final EIS regarding special recreation management areas has been revised to reduce the number and size of proposed special recreation management areas. In addition, no special recreation management areas emphasizing off-highway vehicle use have been identified in the Proposed RMP.
- I4-16 In response to this and similar comments, the management action in Section 2.4.15.1 of the Proposed RMP and Final EIS regarding special recreation management areas has been revised to reduce the number and size of proposed special recreation management areas. In addition, no special recreation management areas emphasizing off-highway vehicle use have been identified in the Proposed RMP. The type of issues raised in your comment will be considered by the Ely Field Office when project-specific plans are prepared or evaluated.
- I4-17 Please refer to Response to Comment I4-16.
- I4-18 Please refer to Response to Comment I4-16.
- I4-19 In response to your comment, the text in Section 2.4.15.2 of the Proposed RMP and Final EIS has been revised to clarify the discussion of special recreation permit areas for motorcycle events.

Letter I4 Continued

- 14-20 [b. NO recreation management areas with an intensive ORV emphasis should be in the selected alternative. Competitive ORV recreation use, beyond touring:
Is destructive by nature
Breeds disrespect for wild country
Is contrary to the "tread lightly" philosophy
Encourages/ promotes/ legitimizes unethical motorized behavior
- 14-21 [f. Outfitter and guide permits should be limited by social capacity as well as by resource conditions. Crowding damages wild land experience. Quality recreation experience is in direct proportion to the lowest numbers of others encountered.
- 14-22 [c. Motorcycle events must be prohibited (Alt. D) for the same reasons as above.
- 14-23 [d. Truck events must be prohibited (Alt. D) for the same reasons as above.
- 14-24 [e. "Go fast" ORV competitive events encourage machine thrill sport and a demand for speed and machine challenge elsewhere. Such events displace all other users for the duration of the event and in any areas where "go fast" activity is taking place, event or not.

9) Special Designations

- 14-25 [• Backcountry byways (2.5.22.2):

Please do not consider extending the Silver State Trail beyond what is legislated in the Lincoln Co. Public Lands Bill. It remains to be seen if management capabilities can minimize potential impacts. No further designations should be made until it is clear that there is capacity for management.
- 14-26 [• WSAs (2.5.22.3):

a) It is outrageous that BLM will not be considering new WSAs! The original WSA process is now 20 years old and out-dated. Values and situations have changed dramatically. An onslaught of ATV use, and consequent proliferation of unauthorized renegade routes, has drastically affected previously unroaded lands. White Pine Co. community support for Wilderness indicates that there is an increasing demand for protection of these endangered areas.
- 14-27 [b) The preferred alternative language, which declares, "other multiple uses would be emphasized", is totally unacceptable! WSAs by law must retain their Wilderness character; Alt. E language makes adhering to the law impossible.



Responses to Letter I4

- 14-20 Please refer to Response to Comment I4-16.
- 14-21 Please refer to Response to Comment I4-16.
- 14-22 Please refer to Response to Comment I4-16.
- 14-23 Please refer to Response to Comment I4-16.
- 14-24 In response to this and similar comments, the text in Section 2.4.15.2 of the Proposed RMP and Final EIS has been revised regarding the issuance of outfitter and guide permits. Monitoring of outfitter and guide use would still occur for three years; however, outfitter and guide permits would not be limited during that three year study. Should the study show resource impacts, including user conflicts as a result of outfitter and guide actions, the Ely Field Office may address those problems by issuing outfitter and guide permits with special stipulations and conditions. No allocation system, including a competitive bid process, is included in the Proposed RMP and Final EIS.
- 14-25 Please refer to Response to Comment I4-16. The location of the Silver State Trail was designated in the Lincoln County Conservation, Recreation, and Development Act of 2004. The Ely Field Office is currently developing an implementation management plan for that trail. During site-specific transportation planning, the Ely Field Office will hold public scoping meetings to address completeness of the route inventory and public issues, concerns, and access needs. Neither the management plan for the Silver State Trail nor any possible extensions of the trail are addressed in the Proposed RMP.
- 14-26 When the Ely RMP planning process was initiated, there was no requirement in the Land Use Planning Handbook to identify lands with wilderness characteristics. Under the new Planning Handbook (2005), the BLM no longer designates wilderness study areas as part of the land use planning process. While the new Handbook allows the Ely Field Office to consider information on wilderness characteristics as part of travel management and visual resources management, no lands with wilderness characteristics were identified during the Ely RMP planning process.
- 14-27 To clarify, Section 2.4.22.4 in the Draft RMP and EIS and Proposed RMP and Final EIS states that other multiple uses would be emphasized outside of Wilderness Study Areas.

Letter I5

Ely Draft RMP/EIS Comment Form

Informed decisions are better decisions: BLM believes that extensive public involvement will serve to improve communication, develop enhanced understanding of different perspectives, and identify solutions to issues and problems. We look forward to hearing from you!

Where to provide comments: You can hand this form in at The Ely BLM Field Office (702 N. Industrial Way) or mail it in using the address on reverse

Tips on providing effective comments: The BLM land use planning process is based on agency policy, science, and social value. Specific comments that deal with important management methods and decisions are extremely helpful to the BLM. Overly general statements of support or opposition are less effective. Also remember that this RMP will deal with broad management decisions, not site-specific actions.

Name Ray Ehly Jr County Washoe
Title _____ Affiliation _____

Mailing Address PO Box 19606

City Reno State NV Zip 89511

Date 11/18/05 Meeting Location (if applicable) _____

☐ Please check box if you do not want your name released when comments are made public.

COMMENT (use back side if you need additional space or attach additional sheets)

15-1 215-133 Travel Plans,
Please Restrict ATV Use to Designated Roads
and Trails

15-2 I am tired of seeing vehicles traveling off roads
and trails, diminishing my enjoyment of our lands
Strict Enforcement, large Penalties, Confiscation
of ATV's for failure to Abide, would be a start
to correct a growing Problem

Rapidly

Thank you

Return comments during the open house or mail postmarked by:

November 28, 2005

To Return Via Mail:

Fold in thirds so that BLM address (on reverse) is showing, add postage, tape bottom of fold, and mail.

Responses to Letter I5

15-1 The management actions in the Proposed RMP include restricting OHV use to designated roads and trails.

15-2 In response to your comment, the text in Section 2.4.14 of the Proposed RMP and Final EIS has been revised to clarify the discussion of off-highway vehicle management.

Letter I6

Sehi, Debby

From: Gene_Drais@nv.blm.gov
Sent: Thursday, September 29, 2005 4:32 PM
To: Ludwig, Andrew; Moore, Russ; Sehi, Debby
Cc: William_E_Dunn@nv.blm.gov; Gary_Medlyn@nv.blm.gov; Rick_Orr@nv.blm.gov; James_Perkins@nv.blm.gov; Jake_Rajala@nv.blm.gov; Stephanie_Trujillo@nv.blm.gov; Jeff_Weeks@nv.blm.gov; Stephanie_A_Connolly@nv.blm.gov
Subject: Fw: Comments pertaining to EIS Statement for Ely District
Attachments: These comments pertain to the Draft.doc



These comments
pertain to the ...

Same comment I sent just a few minutes ago from another person.

Gene Drais
Acting Associate Field Manager
Ely Field Office
775-289-1880

----- Forwarded by Gene Drais/EYFO/NV/BLM/DOI on 09/29/2005 03:30 PM -----

| | |
|-------------------------|--|
| "Sue Gilbert" | |
| <sgilbert@water.nv.gov> | To |
| | |
| 09/29/2005 02:21 PM | <elyrmp@blm.gov> cc |
| | |
| | Subject |
| | Comments pertaining to EI Statement for Ely District |

(See attached file: These comments pertain to the Draft.doc)

Letter I6 Continued

Attachment to e-mail from Sue Gilbert

- I6-1 [These comments pertain to the Draft-Executive Summary, Resource Management Plan/Environmental Impact Statement for the Ely District. Page 3.3-8 states, "all surface water in Nevada is fully appropriated and no new applications for permits to appropriate surface water rights may be approved." Please note that there are numerous springs and small streams throughout the state for which no determination of water quantity has been made by the State Engineer's office. One must make application on a particular source before this determination of water quantity is made. The State Engineer may approve an application if he determines that there is sufficient water for the proposed use. You should also be aware that there may be vested claims on a various sources. Vested claims are those in which a beneficial use of the water can be established before the establishment of Nevada water law. It is not necessary for vested claims to be filed until such a time as so order by the State Engineer.
- I6-2 [Please be advised that Table 3.3-1, Water Availability in Shallow Alluvial Aquifers, which shows the perennial yield for various groundwater basins throughout White Pine and Lincoln counties, may be subject to change as more studies and tests are conducted in these areas. Additionally, the committed resource, as enumerate in the table, is subject to change as existing permits and applications are approved, denied, forfeited, cancelled, etc.

Responses to Letter I6

- I6-1 In response to your comment, the text in Section 3.3.3 of the Proposed RMP and Final EIS has been revised to clarify the discussion of water rights and permit applications.
- I6-2 In response to your comment, the text in Section 3.3.1, and the footnote to Table 3.3-1, of the Proposed RMP and Final EIS have been modified to clarify the discussion of water availability.

Letter I7

November 29, 2005

Bruce Flynn
Bureau of Land Management, Ely field office
HC33 Box 33500
Ely, NV 89301

Dan Heinz
5055 Wilcox Ranch Road
Reno, NV 89510
Following are my comments on the Draft RMP.
General:

The current staff of the Ely field office can be trusted to do the right thing but this plan is not for you, it is for the long view when current personnel will not be in place. You owe the public a document that will lay out clear, objective, criteria that will help assure future management will not slip, allowing regression of costly restored lands back to their current degraded condition.

17-1 [There have been several major campaigns to restore watersheds and deteriorated rangelands over the years. These have succeeded only in the few situations where the causative factors for the poor conditions were corrected for the long term. So very much public money has been wasted trying to correct symptoms rather than dealing with the basic management problems. I do not find any clear direction to analyze causative factors or to correct management over the long term. Yes, the draft contains some vaguely implied direction but such direction must be strong and clear.

17-2 [I am particularly concerned that the role of past poor grazing practices have played in the massive encroachment of PJ is not highlighted. Highlighted in a manner, which can direct corrective management for all post treatment programs. Poor grazing practice greatly reduces vegetative competition for PJ seedling establishment while reducing wildfire. The Draft does not even provide a comprehensive bibliography laying out the science available on this subject.

Grazing:

17-3 [Performance based grazing is ready for trial only if very specific, objective, and measurable performance criteria are established which protect the multiple resources which depend on healthy, productive range lands. For example only: 4" stubble ht. must remain after grazing on ABC creek, and/or use of riparian willows by cattle will not exceed 30%.

17-4 [Subjective criteria like iterated in the Standards and Guidelines make permit administration difficult indeed.

17-5 [Grazing practices that purport to improve rangelands most often only improve forage for livestock, if they accomplish even that, and are not multiple use orientated.

Responses to Letter I7

17-1 The Proposed RMP and Final EIS includes text revisions from the Draft RMP and EIS in several locations to provide clarification of the Ely Field Office's proposed approach to identifying causative factors (see Section 2.4.19 regarding watershed analyses) and monitoring of rangeland health.

17-2 Expansion of pinyon-juniper communities is related to a variety of factors with changes in fire regime being one of the foremost. The change in fire regime, in turn, is partially related to grazing management (i.e., fuels manipulation) and partially to levels of local fire suppression. The variety of factors affecting pinyon-juniper expansion will be considered in the proposed management of these areas during and following watershed analysis.

17-3 The term Performance Based Grazing has been removed as a Parameter. Performance Based Grazing emphasized flexibility. Flexibility is allowed under current regulation and specifically through allotment management plans. Current policy and regulation are not decisions in the Proposed RMP. Flexibility will continue to be addressed on a site-specific basis. Allotment compliance will continue and will be prioritized based on criteria to include resource issues and operator performance capabilities. Management objectives are established during the term permit renewal process or the watershed analysis process.

17-4 Monitoring objectives are developed in association with the Standards and Guidelines, which may be somewhat subjective. However, the objectives are measurable and achievable and consider resources and resource uses. Progress toward meeting the standards is then based on the objectives. These will continue to be developed.

17-5 Livestock grazing is a multiple use activity and other resource uses are considered in association with authorizing grazing use. Multiple use objectives are established associated with the standards for rangeland health. Conformance with established guidelines to include effective management practices is essential to maintaining or achieving the standards for rangeland health.

Letter I7 Continued

- 17-6 [The RMP must give direction that objective and measurable criteria be established, and amended to the grazing permit, as a part of the allotment planning process for performance based grazing.
- 17-7 [A new RMP is an opportunity to review old grazing policies such as basic rangeland suitability for domestic livestock grazing in the first place.
- 17-8 [The draft implies grazing policies for the Mojave will be revisited. This is worrisome, that land has been severely degraded by past grazing and may never recover. There are large areas administered by this field office outside of the Mojave, which receive very low precipitation and need to be reviewed for ability to sustain grazing at modern standards for acceptable impacts.
- 17-9 [The selected alternative must direct review of all lands receiving 8" or less annual precipitation for capability to support domestic livestock grazing at economic levels within acceptable impact parameters.
- 17-10 [Recreation:

The Draft proposes to establish special recreation management areas for ORVs.

Touring public lands via motor vehicle is a long established use that can well be allowed within acceptable impact criteria. There are thousands and thousands of routes now available and capable of supporting touring via ORV.
- 17-11 [The Draft is totally unclear exactly what is proposed within these special areas, why there is a need for them in the first place. One must suspect such an area would allow "challenging" machine use, and other activities which have little to do with enjoying the wildness of Nevada's back Country.
- 17-12 [Promoting ORV recreation at this time seems like very bad policy. The BLM cannot even begin to regulate or manage existing opportunities.
- 17-13 [The Draft needs to present a great deal more explanation and justification for the concept of special recreation areas for ORVs and it must direct site specific EAs for all such proposed development.
- 17-14 [ORV Racing by any type is destructive by its very nature. It encourages inappropriate use of other areas. It flies in the face of "tread lightly" policy. It promotes disrespect for wild land. It is in severe conflict with most any other use of the public lands.
- 17-15 [A major, albeit sometimes very tough, roll for public land managers is to just say no to uses, which cannot happen without long term land damage.
Public "demand" must never override good land ethics.
- 17-16 [The long-term public good is going to best be served by phasing out all high land impact competitive sports. Do not advance or encourage racing or any other destructive or competitive use of our lands.

Responses to Letter I7

- 17-6 Please refer to section 2.4.16 and 2.7.16 in the Proposed RMP and Final EIS for a discussion of objective and measurable criteria relative to performance-based grazing.
- 17-7 The Proposed RMP specifies management policies and action and provides programmatic and implementable direction for management of the public lands. Policies such as rangeland suitability will be reviewed on an allotment-specific basis.
- 17-8 The Proposed RMP specifies management policies and actions and provides programmatic and implementable direction for management of the public lands. Evaluation of livestock grazing use relative to achievement of the Mojave-Southern Great Basin Standards is a continual and on-going process. Grazing use will be evaluated during the term permit renewal process, during watershed analysis, and during grazing use monitoring..
- 17-9 Livestock grazing suitability and the evaluation of grazing use relative to grazing any Mohave Desert lands and the achievement of the standards for rangeland health will be conducted during the term permit renewal process, during watershed analysis, and during grazing use monitoring. Authorizing grazing may be appropriate in certain situations. These are issues that would be considered associated with authorizing any grazing use.
- 17-10 Comment noted. The Ely Field Office recognizes that off-highway vehicle use is an acceptable use of public land wherever it is compatible with resource management objectives. However, no single-focus OHV emphasis areas have been identified as a recreation designation.
- 17-11 In response to this and similar comments, the management action in Section 2.4.15.1 of the Proposed RMP and Final EIS regarding special recreation management areas has been revised to reduce the number and size of proposed special recreation management areas. In addition, no special recreation management areas emphasizing off-highway vehicle use have been identified in the Proposed RMP.
- 17-12 Please refer to Response to Comment I7-11.
- 17-13 The BLM deems the recreational use of OHVs to be a valid multiple use of public lands. Management actions are included in Section 2.4.14 and 2.4.15 of the Proposed RMP and Final EIS to ensure that OHV use would have acceptable effects on other uses and resources. As required by existing regulations, an EA or EIS would be prepared for specific developments or events, as appropriate.
- 17-14 The type of issues raised in your comment will be considered by the Ely Field Office when project-specific plans are prepared or evaluated.
- 17-15 Please refer to Response to Comment I7-14.
- 17-16 Please refer to Response to Comment I7-14.

Letter I7 Continued

I7-17 [In addition I endorse all points raised by the Red Rock Audubon Society.

Sincerely:

Dan Heinz

Responses to Letter I7

I7-17 Comment noted.

Letter I8

FROM : TRIPLE AUGHT FOUNDATION

FAX NO. : 7757611100

Nov. 28 2005 03:28PM P1

NOV 28 2005

MICHAEL AND MARY HEIZER
P.O. Box 33
HIKO, NEVADA 89017
775-761-1100

November 28, 2005

Gene Drais
RMP Project Manager
Bureau of Land Management
HC 33 Box 33500
Ely, Nevada 89301-9408

Re: Draft Resource Management Plan/Environmental Impact Statement for the Ely District

Dear Mr. Drais:

We wish to submit our comments to the Bureau of Land Management (BLM) during the public review period of the *Draft Resource Management Plan/Environmental Impact Statement* (Draft RMP/EIS) for the Ely District. As residents of Garden Valley with property in both Lincoln and Nye Counties, we hope our comments will be seriously considered and that they will contribute to decisions which minimize environmental impacts in this area. Our specific concerns and comments regard the management of "Visual Resources," "Travel Management and Off-Highway Vehicle Use," "Recreation" and "Areas of Critical Environmental Concern."

"2.5.11 Visual Resources"

Our primary interest is to protect a 1-1/2 mile long, 260 acre massive sculpture project know as *City*, located in Garden Valley and mentioned on page 2.5-111 of the Ely RMP.

"Garden Valley is one of the few pristine, scenic valleys remaining in Nevada. It is surrounded by the Quinn Canyon, Grant, Worthington, and Golden Gate ranges and combined with those ranges, provides an excellent example of Nevada's Basin and Range ecological system. In addition, there is an internationally significant sculpture being completed within Garden Valley. The visual and sensory elements of the sculpture depend in large part on the pristine scenic quality of the land surrounding it. On completion, the sculpture is likely to attract many visitors annually to the area. The Visual Resource Management Class II for this special recreation management area would serve to preserve the existing character of the landscape."

I8-1

Responses to Letter I8

I8-1

Thank you for expressing your concerns. The Proposed RMP does not propose the Garden Valley special recreation management area for scenic qualities. However, the Garden Valley area continues to be identified for visual resource management Class II and Class III objectives. The type of issues raised in your comment will be considered by the Ely Field Office when project-specific plans are prepared or evaluated.

Letter I8 Continued

- 18-1 We highly support "Map 2.4-5/Visual Resource Management Classes Alternatives B and E," designating Garden Valley and part of Coal Valley as a "Class II Objective." If this area is designated as such, we hope to work with the BLM to further protect the sculpture and these valleys from any physical developments to the surrounding landscape from man-made structures, utility corridors, water pipelines and rail lines.
- 18-2 Within this "Class II Objective," we also recommend the BLM continue to allow livestock grazing (it was suggested in Volume 2 of the Ely RMP Draft [page 4.11-4] that livestock grazing will be prohibited). It is our opinion that livestock and wild horse populations in no way impair the visual character of the land. We support these traditional uses of the land and hope to see them continue into the future.
- "2.5.14 Travel Management and Off-Highway Vehicle Use"**
- 18-3 The issue of managing off-highway vehicles within 11.4 million acres is necessary due to increased pressures from recreational off-highway vehicles. Managing invasive weed populations on terrain that has been abused by off-highway vehicles and motorcycles is impossible in this delicate, high desert environment. Off road vehicles and uncontrolled county road grading destroy vegetation, disturb topsoil and promote the spread of noxious weeds. Every year we see weed invasion increase upon these disturbed areas. As residents of Garden Valley who practice a comprehensive weed control program, we are disturbed by these influences around our property, the desert floor and the mountain terrain above.
- 18-4 Considering the damage off-road vehicles impose upon the environment, we recommend that all vehicles be prohibited from traveling anywhere except maintained roads and trails, adhering to "Map 2.4-32 District Transportation Map/Alternative D." Although restrictive, we find the number of maintained roads and trails within the Ely District to be adequate, especially if there are areas designated for off highway vehicle use, such as "2.5.15.1 Parameter-Special Recreation Management Areas."
- "2.5.15 Recreation"**
- 18-5 It is our desire to protect the City sculpture and its surrounding environment within Garden Valley. Therefore, we support "Map 2.4-33/Special Recreational Management Areas Alternatives B and E." With the proposed 'Garden Valley Special Recreation Management Area,' we hope to work with the BLM to further protect this unique American sculpture and the surrounding landscape from avoidable degradation.
- 18-6 We also support, "Map 2.4-34/Off-highway Vehicle Use Emphasis Areas Alternative B," and "Map 2.4-37 Motorcycle Special Recreation Permit Areas Alternative B." However, we strongly object to "Map 2.4-38 Motorcycle Special Recreation Permit Areas Alternatives C and E" (also associated with "Map 2.4-33/Special Recreational Management Areas Alternatives B and E"). The introduction of the Alamo Motorcycle Special Recreational Permit Area within Coal Valley would be detrimental to the sculpture, the surrounding environment and the local ranching industry. We feel the

Responses to Letter I8

- 18-2 Please refer to Section 2.6.16 of the Proposed RMP and Final EIS for a discussion of the subject livestock closures. As indicated in the text, these closures are included under Alternative B as protective measures related to desert tortoise and bighorn sheep. The anticipated effects to visual resources are strictly coincidental and are not the reason for the suggested closures.
- 18-3 In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify criteria that may be used when designating routes in a project-specific transportation plan.
- 18-4 Please refer to Response to Comment I8-3.
- 18-5 Please refer to Response to Comment I8-1.
- 18-6 Thank you for expressing your concern. The special recreation permit area in the Coal Valley area is based on historic motorized event courses. The type of issues raised in your comment will be considered by the Ely Field Office when the project-specific plan is prepared.

Letter I8 Continued

18-6 territory designated around Caliente ("Map 2.4-37 Motorcycle Special Recreation Permit Areas Alternative B") will be sufficient for motorcycle enthusiasts. Additionally, "The Silver State Off-Highway Vehicle Trail" (*Lincoln County Conservation, Recreation and Development Act of 2004*) will provide all off-highway vehicle enthusiasts with an enormous length of trails within the Ely District.

"2.5.22.1 Parameter - Areas of Critical Environmental Concern"

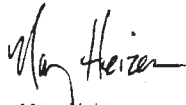
18-7 Additionally, we would like to see further protection of the Mount Irish Archeological Site ("Map 2.4-55 Areas of Critical Environmental Concern Locations") and support "Alternative B" within the "Mount Irish ACEC Management Actions/Alternatives." This area has one of the greatest densities of ancient petroglyphs in the United States. The protection of prehistoric remains and artifacts is vital to the cultural legacy of this nation.

18-8 It is our primary goal to protect the sculpture, Garden Valley and Coal Valley. Designating Garden Valley and part of Coal Valley as a "Class II Objective" within the "Visual Resource Management Class" and as a "Special Recreation Management Area" will begin the process of protecting City within a rapidly shrinking natural environment. We hope to work with the BLM in the future to further protect this unique American artwork, and the significant natural resources and traditional land uses that today occupy the lands surrounding the project.

Sincerely,



Michael Heizer



Mary Heizer

Responses to Letter I8

18-7 Please refer to Section 2.4.22.1 of the Proposed RMP and Final EIS for a description of special management prescriptions for the Mount Irish Area of Critical Environmental Concern.

18-8 Please refer to Response to Comment I8-1.

Letter I9

November 28, 2005

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

Dear Ely RMP Team;

I have lived in Nevada for fourteen years now. I spend a great deal of time traveling the state and exploring its many wonderful natural areas, much of it on BLM lands, especially newly designated wilderness areas and wilderness study areas. I have a huge stake in how the BLM manages wild Nevada, and I am asking that you please accept my comments on the draft resource management plan for BLM lands in eastern Nevada.

I9-1 [My primary concern in the draft plan is the protection of wilderness quality public lands. There is a lot of potential for wilderness designation in eastern Nevada. I believe the BLM should continue to restore eight WSAs, and manage them to keep them from damage from illegal off-highway vehicle use and other illegal activities, at least until Congress has a chance to decide their fate.

I9-2 [I have been to Ely three times this year already, and may make a fourth trip before winter closes in completely. I am fully aware of the areas that could become designated wilderness and have visited a couple of them. These special places like Becky Peak, with its high meadows and rich habitat for elk, pronghorn, and other wildlife, are favorites of outdoors enthusiasts. The Antelope Range with its outstanding vistas, wildlife, and opportunities for solitude is equally deserving of protection. In the case of the spectacularly scenic Blue Mass/Kern Mountains, I would like to see the Area of Critical Environmental Concern proposal for this area expanded to include the entire area proposed by the Nevada Wilderness Coalition. I would urge the BLM to fully consider potential wilderness areas and put that in its plan.

The Ely area is hugely popular with hunters and anglers, and for good reason.

Hunting is a tradition here, as you can see in the many photographs in Ely's restaurants.

I9-3 [Wilderness designation would only strengthen this tradition, like in the Government Peak area, adjacent to the Mt. Moriah Wilderness. Expansion of wilderness here would protect as wilderness to protect wildlife viewing and hunting opportunities, as well as habitat for wildlife. The expanded Heusser Mountain Bristlecone Pine area just outside of Ely also needs to be protected.

I9-4 [Finally, there should be no oil and gas leasing or the placement of wind power facilities within their boundaries until the wilderness status of these lands has been determined. I further believe that these areas should be designated as Class 1 Visual Resource Management Units, which would enhance their wilderness resource value for visitors, whether they be hunters, hikers, or simply the curious.

Responses to Letter I9

I9-1 Please refer to Section 2.4.22.4 of the Proposed RMP and Final EIS for a description of the continuing management of existing wilderness study areas in the Ely RMP decision area. Existing wilderness study areas will continue to be managed under the BLM's Interim Management Policy. In addition, the Proposed RMP closes existing wilderness study areas to motorized and mechanized travel. No new wilderness study areas have been designated in the Proposed RMP.

I9-2 In response to your comment, the Ely Field Office considered the size of the Blue Mass Scenic Area ACEC but did not change the area proposed for designation. Please refer to Section 2.4.22.1 of the Proposed RMP and Final EIS for a description of the Blue Mass Scenic Area ACEC. As part of the ACEC regulations, the Ely Field Office may not use an ACEC designation as a substitute for wilderness suitability recommendation.

I9-3 The subject of this comment is beyond the scope of the Ely RMP. Only Congress can designate wilderness.

I9-4 No oil, gas, or wind energy projects will be allowed within existing wilderness study areas until Congress has made a determination on the wilderness designation of such areas.

I9-5 A combination of visual resource management classes have been assigned over these areas. Please refer to Section 2.4.11 in the Proposed RMP and Final EIS for clarification of visual resource management class designations.

Letter I9 Continued

I9-6 [Designated roads and trails and all unnecessary vehicle routes should be restored, and off-road vehicles kept to strictly enforced corridors so the "untrammelled" qualities of these spectacular areas remains marred only by nature.

I9-7 [I plan to live out the rest of my days here in Nevada, and in our spectacular backcountry as much as possible. So it stands to reason that I would ask that all the wilderness quality land managed by the BLM's Ely Field Office be protected in the long term for the life of this resource management plan.

Thank you for your consideration.

Sincerely,

William Huggins
430 Salzburg Ave
Las Vegas, NV 89123-7223
USA
feerlessw@earthlink.net

Responses to Letter I9

I9-6 The Ely Field Office recognizes that off-highway vehicle use is an acceptable use of public land wherever it is compatible with resource management objectives. During site-specific transportation planning, the Ely Field Office will hold public scoping meetings to address completeness of the route inventory and public issues, concerns, and access needs.

I9-7 Comment noted. Congress has designated wilderness through the Lincoln County and White Pine County Conservation, Recreation, and Development Acts, 2004 and 2006 respectively.

Letter I10

Mr. Flinn

I10-1 [It appears form the Maps provided with your draft plan you have either
neglected roads that should remain open for public access or someone
may be trying to pull a fast one on the public. one road that does not
appear on your map (2.4-32) the road from Rolling Hills pond to Mud
I10-2 [Springs needs to remain open. I am also opposed to any action in the
RMP that will deny any right currently healed be it mining, grazing,
hunting, or any access to the public for recreation.

Thank You

Arlin Hughes

175 west 500 north
Veyo Utah
84782

Responses to Letter I10

I10-1 Map 2.4.14-1 and Map 2.4.14-2 is based on roads currently known to be maintained by federal, state, and county agencies. To the extent that the road map files used were accurate and up-to-date, this map is inclusive of such roads. However, no warranty is implied regarding the completeness or data accuracy of those data sources, particularly at the small scale necessary for this document. The type of issues raised in your comment will be considered by the Ely Field Office when transportation plans are developed through coordination with local agencies, residents, and interest groups.

I10-2 Please refer to Section 1.5.1, Planning Criterion #12, in the Draft RMP and EIS and Proposed RMP and Final EIS for a discussion of valid existing rights.

Letter I11

November 21, 2005

Mr. Gene Drais

RMP Project Manager

Bureau of Land Management

Ely Office

Re: Ely RMP/EIS

Dear Mr. Drais,

In reference to the RMP for Ely District (#1610 NV-910), we would like to make some comments about the land usage that falls under BLM jurisdiction.

- I11-1 [Section 2.5.14.1 Parameter - Transportation Plan Alternative B states that "All Wilderness Study Areas would be closed to motorized travel." We feel that this is inappropriate as Congress has not yet ruled on Wilderness Study Areas in White Pine County. It would be pre-mature to close access to roads that are still open and reasonable to use.
- I11-2 [Furthermore Alternative B states that, "Greater emphasis on ecological system restoration would be placed on road and trail designations." We would prefer to see the statement read, "Equal emphasis on ecological system restoration and responsible recreation would be placed on road and trail designations."
- I11-3 [The Alternative E contains the statement that "All Wilderness Study Areas would be closed to motorized travel.", again we think that this phrase should be removed, as Congress has not yet ruled on this area, and it would
- be pre-mature to close access to roads that are still open and reasonable to use.
- I11-4 [Section 2.5.14.2 Parameter - Off-highway Vehicles Alternative B has several areas that we disagree with. "0 acres available to cross-country off-highway vehicle use", is drastic and unreasonable. At
- the very least travel across dry lake beds and dry washes should remain open.
- I11-5 [Please change the second bullet point from "Off-highway vehicle use limited

Responses to Letter I11

- I11-1 Vehicle routes that are excluded from wilderness study area boundaries by cherry-stemmed boundaries would remain open, providing motorized access routes to these areas.
- I11-2 A range of alternatives was presented and analyzed in the Draft RMP and EIS and Proposed RMP and Final EIS. Each alternative had a different management emphasis, based on comments received during scoping and the needs/desires of various public land users. While not all management actions would be acceptable to all users, the alternatives do contain a range of approaches for analysis purposes.
- I11-3 Please refer to Response to Comment I11-1.
- I11-4 The designation of dry lake beds as open was considered in the Draft RMP and EIS and Proposed RMP and Final EIS as part of Alternative C. However, it was not incorporated into the Proposed RMP. Not all dry washes would be suitable for OHV use; however, some may be designated as trails when transportation plans are prepared for a watershed or group of watersheds. The public will be invited to participate in the transportation planning process.
- I11-5 In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify how comprehensive travel management planning will occur in the Ely RMP planning area.

Letter I11 Continued

- I11-5 | to designated roads and trails: 10,338,000 acres.", to Off-highway vehicle use limited to existing roads and trails: 10,338,000 acres.
- I11-6 | Also the final point concerning Wilderness Study Areas, should reflect our position on this matter. We feel that this is inappropriate as Congress has not yet ruled on Wilderness Study Areas in White Pine County. It would be pre-mature to close access to roads that are still open and reasonable to use.
- I11-7 | Alternative C states; "Open to cross-country off-highway vehicle use: 32,000 acres in dry lake beds". We do not wish to limit the scope of cross-country off-highway travel in dry lake bed areas.
- I11-8 | Alternative E: We would like to re-iterate the same comments as in Alternative B.
- I11-9 | Section 2.5.15.1 Parameter - Special Recreation Management Areas
Table 2.5-11, (page 2.5-137, line three), should be revised to read "Heritage tourism and motorized recreation" in the "Primary Values" column.
- I11-10 | Alternative D recommends no special recreation areas, existing or future. We strongly disagree with this, as this is not in the public interest and completely unreasonable.
- I11-11 | Alternative E should include Pahrnanagat along with the other five areas listed for motorized vehicle recreation. We are currently working in partnership with the Ely BLM office on a responsible recreation project that includes motorized recreation. To develop the proposed action, we ask that

you add the Pahrnanagat area to the list of five, (making a list of six).
- I11-12 | Section 2.5.15.2 Parameter - Special Recreation Permits

Alternative B states that "A maximum of two truck events would be permitted

Responses to Letter I11

- I11-6 | Please refer to Response to Comment I11-1.
- I11-7 | Comment noted. The Proposed RMP does not designate any areas as "Open" to off-highway vehicle travel.
- I11-8 | Please refer to responses to comments I11-1 through I11-7.
- I11-9 | In response to your comment, the text in Table 2.5-11 and Section 2.5.15.1 of the Proposed RMP and Final EIS has been revised to clarify the discussion of Special Recreation Management Areas. No special recreation management areas emphasizing off-highway vehicle use have been identified in the Proposed RMP.
- I11-10 | Comment noted. Please refer to Response to Comment I11-2.
- I11-11 | Please refer to Response to Comment I11-9.
- I11-12 | In response to your comment, the text in Section 2.4.15.2 of the Proposed RMP and Final EIS has been revised to clarify the discussion of competitive vs. non-competitive events.

Letter I11 Continued

Responses to Letter I11

I11-12

each year on race routes subject to NEPA analysis". This is unclear to us.
Are these competitive or non-competitive events?

I11-13

Alternative E recommends that "Four special recreation permit areas totaling approximately 1.38 million acres would be established to maximize opportunities for motorcycle recreation permit events. A maximum of two truck events would be permitted each year. Four routes would be established for all truck events." This sounds like competitive professional or amateur racing. Our usage is vastly different from any type of competitive event.
We are committed to slow speeds, and high traction travel, and as such, wish to be considered separately in any consideration for organized events. We would like to see low speed non-competitive events be added for consideration.

Please include me on your email list for any actions, requests or results concerning these parameters.

Finally please allow me to express our sincerest wishes that we will continue to have a long lasting and mutually beneficial relationship with the BLM, and the other users of our great lands. We have and will continue

to help in desert clean-up projects, tread lightly awareness, and of course

respect and manage the trails we enjoy.

Sincerely,

Don Larrick

5824 Kane Holly Street

Las Vegas, NV 89130

For the members of the Total Carnage Four Wheel Drive Club

Las Vegas, Nevada

I11-13

In response to your comment, the management action in Section 2.4.15.2 of the Proposed RMP and Final EIS has been revised to clarify non-competitive off-highway vehicle events. Such events will be evaluated on a case-by case basis and allowed if appropriate.

Letter I12

To Whom It May Concern:

I would like to submit the following comments for public record: All existing roads, trails, racecourses and washes need to remain open for OHV use in the 11.4 million acres that this RMP will manage. These roads and trails are a necessity for quality OHV recreation. The closing of these trails would severely impact the OHV community in a negative way. The closures would create fewer opportunities to recreate and explore new areas; forces more people into 1 concentrated area and create an unsafe situation by having to many OHVs riding together. Given the fact that no new roads or trails are being established for use in these areas, the implementation of the Silver State Trail System invading existing racecourses, it would be detrimental to the off-road racing community to lose anymore trails in these areas. There needs to be an equal designation of OHV open use land that equals the other uses

(wilderness, ranching,

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on wlatt lemNa se,a idn Lincoln County.

It saddens me that my children and grand children will not be permitted to explore areas of Lincoln county anymore on OHVs like when I was a child. Having been an OHV user for almost 30 years, I can honestly say that none of these new wilderness areas were ever damaged by an OHV. I have ridden in all areas of Lincoln County and everything is fine.

The only damage I can remember seeing is damage caused by fires, springs trampled by wild horses and cattle and over grazing of areas due to poor management. I have revisited many of these areas over and over and there is no damage. I can only hope that the BLM will respect the rights of people and taxpayers to recreate and not create policy based on inconclusive scientific discovery or cater to environmental groups that want nothing more than to eliminate OHV use all together.

Here are my suggestions of how this land should be managed. The BLM needs to designate 3 or 4 million acres that will be classified as open use much like the Wilderness designation to preserve and protect the OHV communities' recreation areas from environmental groups. You also need have a trail replacement program so that for every mile of trail

Responses to Letter I12

I12-1

In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify how comprehensive travel management planning will occur in the Ely RMP planning area. Not all dry washes would be suitable for OHV use; however, some may be designated as trails when transportation plans are prepared for a watershed or group of watersheds. The public will be invited to participate in the transportation planning process.

I12-2

Comment noted. All existing roads and trails will remain open until site-specific travel management plans have been completed with public input.

I12-3

Comment noted. The intention of the Ely Field Office is to manage not eliminate off-highway vehicle use.

I12-4

Please refer to Response to Comment I12-1.

Letter I12 Continued

I12-4

or racecourse you close there will be a new mile re-established to replace it and the word "designated" needs to be removed from the RMP and replaced with the word "existing", for example all existing trails, roads, race courses and washes will remain open for OHV use in the 11.4 million acres. This statement needs to be added to the RMP.

Thank you,

Anthony Z. Livreri
Title: American Citizen
Representing: MRAN, Bushwackers MC and OHV users
5113 wapiti point ct
las vegas, nv
89130

Letter I13

Sehi, Debby

From: Gene_Drais@nv.blm.gov
Sent: Thursday, September 29, 2005 4:26 PM
To: Ludwig, Andrew; Moore, Russ; Sehi, Debby
Cc: William_E._Dunn@nv.blm.gov; Gary_Medlyn@nv.blm.gov; Rick_Orr@nv.blm.gov; James_Perkins@nv.blm.gov; Jake_Rajala@nv.blm.gov; Stephanie_Trujillo@nv.blm.gov; Jeff_Weeks@nv.blm.gov; Stephanie_A_Connolly@nv.blm.gov
Subject: Comment on Draft RMP
Attachments: These comments pertain to the Draft.doc



These comments
pertain to the ...

For your analysis and consideration.

Gene Drais
Acting Associate Field Manager
Ely Field Office
775-289-1880

----- Forwarded by Gene Drais/EYFO/NV/BLM/DOI on 09/29/2005 03:25 PM -----

| | | |
|---|------------------------------------|---------|
| "Robert K. Martinez" <robertm@water.nv .gov> | <elyrmp@blm.gov> | To |
| 09/29/2005 12:45 PM | | cc |
| | Resource Management Plan comments. | Subject |

The attached word document is comments on the Resource Management Plan for
Ely BLM.
(See attached file: These comments pertain to the Draft.doc)

Letter I13 Continued

Attachment to e-mail from Robert Martinez

I13-1

These comments pertain to the Draft-Executive Summary, Resource Management Plan/Environmental Impact Statement for the Ely District. Page 3.3-8 states, "all surface water in Nevada is fully appropriated and no new applications for permits to appropriate surface water rights may be approved." Please note that there are numerous springs and small streams throughout the state for which no determination of water quantity or issuance of a water right has been made by the State Engineer's office. One must first make application on a particular source before this determination of a water appropriation of a specific quantity is made. The State Engineer may approve an application if he determines that there is sufficient water at the source for the proposed use, does not conflict with existing rights, and that given under NRS 533.370. You should also be aware that there might be vested claims on a various sources. Vested claims are those in which a beneficial use of the water can be established before the enactment of Nevada water law. It is not necessary for vested claims to be filed until such a time as so ordered by the State Engineer.

I13-2

Please be advised that Table 3.3-1, Water Availability in Shallow Alluvial Aquifers, which shows the perennial yield for various groundwater basins throughout White Pine and Lincoln counties, may be subject to change as more studies and tests are conducted in these areas. Additionally, the committed resource, as enumerated in the table, is subject to change for applications, permits and certificates due to actions by this office such as approval, denial, cancellation and forfeiture, etc. See NRS Chapters 533 and 534.

Responses to Letter I13

I13-1

In response to your comment, the text in Section 3.3.3 of the Proposed RMP and Final EIS has been revised to clarify the discussion of water rights and permit applications.

I13-2

In response to your comment, the text in Section 3.3.1, and the footnote to Table 3.3-1, of the Proposed RMP and Final EIS have been modified to clarify the discussion of water availability.

Letter I14

Ely Draft RMP/EIS Comment Form

Informed decisions are better decisions: BLM believes that extensive public involvement will serve to improve communication, develop enhanced understanding of different perspectives, and identify solutions to issues and problems. We look forward to hearing from you!

Where to provide comments: You can hand this form in at The Ely BLM Field Office (702 N. Industrial Way) or mail it in using the address on reverse

Tips on providing effective comments: The BLM land use planning process is based on agency policy, science, and social value. Specific comments that deal with important management methods and decisions are extremely helpful to the BLM. Overly general statements of support or opposition are less effective. Also remember that this RMP will deal with broad management decisions, not site-specific actions.

Name Karen Mullen County Washoe
Title N/A Affiliation N/A
Mailing Address 16919 Mt Rose Hwy
City Reese State NV Zip 89511
Date 11/16/05 Meeting Location (if applicable) N/A

☒ Please check box if you do not want your name released when comments are made public.

COMMENT (use back side if you need additional space or attach additional sheets)

I14-1 Support Travel Plan restricting OHV use to existing roads
+ jeep trails and closure of roads that have been
created that don't go anywhere or are steep w/ lots
of erosion. Support Access to public land
I14-2 with increased trailheads for all types of use.
I14-3 I am tired of ATVs destroying wildlife habitat.
Please enforce that they stay on roads - confiscate
their ATVs and maybe they will stop.

I14-4 I do not support more than 200-300 acres going to the public
for housing purposes or business that is not gaming. I do not

November 28, 2005
To Return Via Mail:

Fold in thirds so that BLM address (on reverse) is showing, and

I14-5 We were in drill hole road area
near Basque Canyon in
the Wilderness Study Area & ATVs
were off Rd.

mail postmarked by: support the
10,000-20,000 years
of spiritual land
stage, tape bottom of fold, and mail. going
to the field
prefer it be kept in BLM holding
make it an area of environmental
concern instead. then it is for all to
enjoy.

Responses to Letter I14

- I14-1 Comment noted. For clarification, travel will be restricted to designated, not existing, roads and trails.
- I14-2 The type of issues raised in your comment will be considered by the Ely Field Office when project-specific plans are prepared or evaluated.
- I14-3 The Ely Field Office recognizes that off-highway vehicle use is an acceptable use of public land wherever it is compatible with resource management objectives. In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify criteria that may be used when designating routes in a project-specific transportation plan.
- I14-4 Thank you for your comment. The subject of this comment is beyond the scope of the Ely RMP and does not require further agency response.
- I14-5 Thank you for your comment. The Ely Field Office is not aware of any Wilderness Study Areas in the vicinity of Basque Canyon south of Ely.

Letter I15

Gene,

The weight of the Ely DRAFT RMP has weighed heavily on my mind while I prepared for a three week trip of a lifetime. The Ely RMP lost out. But my reflections on the RMP include the extensive preparation that you and your staff, with the backing of Bob Abby and State Office staff, implemented in preparation for this process. And I believe that the process is finally as important as the document because documents are a step in time but an include process sets the tone. Gene, I want to thank you again and Bob Abby as well for developing this system.

The Ely District is a largely rural district but being hit with urbanization at the edges of Lincoln County with the demands for water to feed that urbanization now encompassing the entire district. Utility corridor rights of way, power plants with potential for air and water pollution, and unregulated recreation demands are some of the external issues impacting the district. Protection of natural, cultural, and historic resources is a challenge because everything going on appears to be against protecting these resources. In addition you are faced with the issue of range changes including expansion of the p-j forest, areas of dense stands of fire prone sagebrush, areas of declining aspen groves, invasion of cheat grass, and the threat of fire rapidly changing, mostly for the worst, the native ecosystems.

You contracted with The Nature Conservancy to provide a process to discuss and describe many of the basic natural systems occurring. The invitation to participate went out to a broad representation base. You helped to found the Easter Nevada Landscape Coalition, which also was an effort to include diverse interests, which through its annual meetings, membership, and executive group, maintained a diverse group and provide a forum for looking at the natural system. Finally, I recollect being invited to participate in the development of a public participation process which addressed some of the framing of discussion issues as well as the public process itself. In the long run the process of inclusiveness, if it can be continued into the future, holds the best hope for minimizing the damage to the land itself.

I15-1

What is the definition of a natural system? Natural systems change with the advent of a warmer climate, fire, uses such as livestock grazing and corridors, and development roads or transmission lines. I don't know whether in this EIS, because I have not read it that closely, whether you arrived at a definition of "natural". I do know that the word "natural" no longer means leaving the land alone. Restoration is a key component; in effect we are managing for a stage in succession.

This is what I would like to see:

I15-2

* Aspen Groves - Once aspen groves are lost, we are unlikely to invest the resources to rebuild them. Management of livestock, wildlife, plant invaders, wild horses and recreation need to be managed to protect them,

I15-3

* Range - we must protect those lands where a native understory of grasslands and forbs exist and try to restore areas of where we have lost them. Management of livestock, ungulates, wild horses, recreation, manmade corridors must be limited to ensure this future

Responses to Letter I15

I15-1

In response to your comment, the term "natural system" has been added to the Glossary in the Proposed RMP and Final EIS.

I15-2

Maintenance and management of healthy aspen is one of the Ely Field Office's stated priorities in the Proposed RMP and final EIS. BLM's proposed management described in Section 2.4.5.3 is designed to maintain or improve the health of these sites.

I15-3

The Federal Land Policy and Management Act stipulates that the BLM manage public lands for multiple uses and sustained yield. Although the cost for projects such as fire rehabilitation and weed treatments are high in the short term, implementing projects of this nature in the long term would improve vegetation communities and lessen the cost of future maintenance. An objective of the Proposed RMP is restoration of a more natural burn cycle with smaller, cooler fires.

Letter I15 Continued

- I15-3 health. The cost of fires and subsequent weed replacement is too expensive. As I recollect grasslands ensure cooler fires and provide habitat for insects, reptiles, small mammals, and birds, as well as livestock and ungulates,
- I15-4 * Restore white sage and other plants damaged by livestock and other uses,
- I15-5 * Costs of management - With BLM and other federal agencies being so severely in terms of funding, increased emphasis must be placed on work by NDOW and livestock operators. I would suggest that NDOW fund some studies, for instance, on elk impact. However, those studies would only have value if a science based institution was involved,
- I15-6 * Continuation of organization like ENLC with increased emphasis on recreation and utility corridor impacts,
- I15-7 * Protection of all threatened and endangered species. Since so many of them are dependent on vulnerable water sources, I would suggest that ENLC also take up the issue of inventorying existing surface and subsurface water sources and find out whether they are protected under state water law and if not how they can be protected. We did not dwell on the issue of water source loss during our meetings several years ago, but currently, it seems to me, that a good portion of the White Pine and Lincoln county springs, seeps, streams, and subsurface ecosystems like the pinyon pines groves near Great Basin Park are threatened with extinction, and
- I15-8 * Encourage NDOW to update its inventory of water sources and needs for wildlife on all water systems and to file for rights on behalf of wildlife. NDOW can impact the State Engineer and it should be speaking up for all Nevada's wildlife.
- These are a few of my early morning thoughts and hopes for the Ely District

"Tina Nappe"
<tnappe@nvbell.ne

Responses to Letter I15

- I15-4 BLM's proposed vegetation treatments and watershed management will be designed to encourage the regeneration and increase of numerous native species. The term "white sage" is commonly used to refer to both *Ceratoides lanata* or winterfat and *Artemisia ludoviciana*, also known as western mugwort, sagewort, or silver wormwood. The former species, which often forms almost pure stands in the Great Basin, is included under the discussion of Salt Desert Shrub communities (see Section 2.4.5.5). The latter species is a widespread understory species occurring in association with sagebrush, pinyon-juniper, and other communities.
- I15-5 The Ely Field Office agrees that there needs to be more participation from state agencies and livestock operators and understands that they suffer from budget issues as well. The Ely Field Office has established and will continue sound working partnerships with state agencies, collaborative partnerships, and others to accomplish the mission of the managing public lands.
- I15-6 The existing assistance agreements with ENLC allow for collaborative work on all landscapes managed by the Nevada BLM.
- I15-7 A priority for BLM management is protection of riparian systems. Through the assistance agreement with the ENLC, data has been provided and volunteers have assisted with wetland development and management. The Ely Field Office will continue in this effort as budget and workforce allow.
- I15-8 The Ely Field Office will maintain a collaborative working relationship with NDOW on all vegetation systems. The Ely Field Office is updating its inventories of water resources, and this information is shared with NDOW. The Ely Field Office suggests that the commenter contact NDOW directly with your concerns.

Letter I16

November 23, 2005

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

Dear Ely RMP Team;

These are my comments on the draft resource management plan for eastern Nevada.

I16-1

Protecting wilderness quality public lands is critical, especially Becky Peak, with its high meadows and rich habitat for elk; Antelope Range with its outstanding vistas; Blue Mass/Kern Mountains; Government Peak area, to protect hunting opportunities; and Heusser Mountain. These wilderness quality areas should be protected in the plan by strictly limiting the visibility and footprint of oil and gas and wind power facilities within their boundaries. Motor travel should be limited to only designated roads and trails.

I want to see some wilderness quality land protected. Thank you.

Sincerely,

Marc Roddin
1432 Ernestine Ln
Mountain View, CA 94040-2909
USA
roddim@gmail.com

Responses to Letter I16

I16-1

When the Ely RMP planning process was initiated, there was no requirement in the Land Use Planning Handbook to identify lands with wilderness characteristics. Under the new Planning Handbook (2005), the BLM no longer designates wilderness study areas as part of the land use planning process. While the new Handbook allows the Ely Field Office to consider information on wilderness characteristics as part of travel management and visual resources management, no lands with wilderness characteristics were identified during the Ely RMP planning process. In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify criteria that may be used when designating routes in a project-specific transportation plan.

Letter I17

To whom it may concern:

My name is Luke Rollins. I am representing myself in this letter. I was born in Ely, NV and was raised in Lincoln County. I spent many years in my youth riding on long time established trails all over the county. In all of my riding, I have noticed a few things that are consistent. One is that most of the people that I ride and race with, use trails that have been already established. There are the exceptions, as there are in any "unwritten" code. One other thing is that I have seen more lands ruined by cattle grazing than by any amount of off highway use. The proof is in the calculation. Consider the average width of an OHV trail and its length. The square miles in a versus calculation proves that more square miles are attributed to cattle dissemination than off highway use. The only thing is OHV use is not profitable. At least not to the BLM. Maybe a OHV registration would help any costs incurred for the management. I do know this, when you take the places away that can be ridden, you make criminals out of locals looking for positive fun. So much for helping the massive increase in rural drug abuse and crime.

I can be contacted @
spankie033@hotmail.com.

My address is 7th and Earnest Panaca, NV 89042.

Thanks for the consideration,
Luke Rollins

Responses to Letter I17

I17-1 Comment noted.

I17-2 The Ely Field Office recognizes that off-highway vehicle use is an acceptable use of public land wherever it is compatible with resource management objectives. In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify how comprehensive travel management planning will occur in the Ely RMP planning area.

Letter I18

Received via email 7-30-05

7/30/05

- I18-1 [I would like the time to comment extended. I would like a hard copy of this plan sent to me for further investigation since I have no access to this on computer.
- I18-2 [I think the following should be totally banned in this entire area:
1. hunting
2. trapping
3. new roads
4. all two stroke vehicles
5. all mining, drilling, grazing and logging
6. all prescribed burning, in which fine particulates are carried by wind thousands of miles ending up in human lungs and causing lung cancer, heart attacks, strokes, pneumonia and asthma.
- I18-3 [I also think this is the taxpayers land, not the politicians and friends land and the taxpayers have paid to save it for eons. they want it saved. only profiteers want to destroy it for their own bank account enrichment.
- I18-4 [I want the wild horses to live on it. I note that there are only 35,000 wild horses left and 4,000,000 cattle to enrich cattle barons have been put on blm lands - and that is atrocious and disgusting.
- I18-5 [I do not want wild horses sent to slaughterhouses to be killed at all ever in any place. They must be allowed to live on these blm lands.

B. Sachau
15 Elm Street
Florham Park, NJ 07932

Responses to Letter I18

- I18-1 Copies of the Draft RMP and EIS were sent to those persons, organizations, and agencies that indicated they would like to receive one; and copies were also placed in local and regional libraries. The availability of the Draft RMP and EIS was also noticed in the Federal Register and the Newsletter distributed to approximately 3,000 recipients on the RMP/EIS mailing list. The required comment period on a Draft RMP and EIS is 90 days. BLM elected to set a 120-day comment period for the Ely Draft RMP and EIS and did not formally extend this period. Although the BLM did not elect to extend the official comment period for this document, comments received after the end of the comment period were considered as late as practicable within the overall document revision and publication process. Comments that were received after the close of the comment period have been accepted and considered in the preparation of the Proposed RMP and Final EIS.
- I18-2 Comment noted. Please refer to Alternative D in the Draft RMP and EIS and Proposed RMP and Final EIS, which excludes many of the discretionary management actions you mention in this comment.
- I18-3 Comment noted.
- I18-4 Thank you for expressing your concerns. Please refer to Sections 3.8 and 3.16 in the Draft RMP and EIS and Proposed RMP and Final EIS for discussion of the actual numbers of wild horses and animal unit months of livestock use within the Ely RMP decision area.
- I18-5 Law and policy prohibit the BLM from disposing of excess wild horses through slaughter. Nowhere in the Proposed RMP is slaughter identified, discussed, or analyzed. During the planning process, the Ely Field Office identified where to manage wild horses and an overall view of how to manage wild horses on the public lands. The management of wild horses is limited to Herd Areas identified after the Wild and Free Roaming Horse and Burro Act (PL-195) was passed in 1971. From these Herd Areas, designation of Herd Management Areas (HMA) occurs, which identifies areas that are suitable for the long-term maintenance of wild horses. Within these HMAs, wild horses are free to roam as one multiple-use of many under a specified appropriate management level, so as not to exceed the capacity of the rangeland to support a thriving natural ecological balance.

Letter I19

Received via email 9-16-05

09/05/05

- I19-1 [Peaceful uses of this land should prevail. wildlife "watchers" spend ten to one what wildlife killers spend - and it is time that they get priority at these nationally supported areas. tax dollars are used for these lands, and they should benefit the primary groups instead of people who still practice habits of 1860.
- I19-2 [these "advisory councils" are all local and this is a nationally supported area. i believe local profiteers may be populating these councils and coming up with biased decisions that will benefit only the local nevada area. when this is a national area, the decisions emanating MUST benefit the entire country. catering to local profiteers is not appreciated by national taxpayers who have been supported this land for eons and paying for it.
- I19-3 [i note a very very small number of horses being provided for in this plan. i note that wild horses seem to be only good for the slaughterhouse according to blm and urge blm to stop this practice. wild horses should get that land. throw out the grazers, the grazers are in fact destroying the land. the intensive use of this land by grazing has in fact destroyed it a great deal. wild horses are more dispersed and do not do as much damage. i note a real attempt by blm to put inaccurate information in this report to try to blame wild horses.
- I19-4 [d is the best of many bad alternatives. i also do not think any govt agency should be offering the american public only "choices" of their choice. i think the american public should be able to make its own complete choices without being told what to do by this agency, which has an extremely bad environmental record.
- I19-5 [i note game species being favored by this agency - WHY cater to gun nuts? i note killing of coyotes - which is abusive. there are so few there that they should be left alone.
- I19-6 [i note a "wind section" being proposed. how many migratory birds will be killed by those wind turbines every year - i note no number put in thiss plan to let the public know what the damage will be to the bird population.
- I19-7 [i also note that "cheatgrass" is an issue and know that cheatgrass problem is a problem because of the intensive grazing the intensive grazing that blm itself has allowed. So blm gets to make a problem and then say it is a problem and needs taxpayer money to fix it?
- I19-8 [also cheat grass was allowed into this country by the USDA - perhaps you should apply to the usda budget for money from their budget to cover this invasion of what they allowed to be imported into the u.s.

B. Sachau
15 Elm Street
Florham Park, NJ 07932

Responses to Letter I19

- I19-1 The Ely Field Office recognizes that hunting is an acceptable use of public land wherever it is compatible with resource management objectives. The Ely Field Office has not prioritized multiple uses in the Proposed RMP.
- I19-2 The Resource Advisory Councils (RACs) are nationally chartered by the Secretary of the Interior and are not populated by profiteers. The RACs consider a wide range of resource issues within the Ely RMP decision area.
- I19-3 Law and policy prohibit the BLM from disposing of excess wild horses through slaughter. Nowhere in the Proposed RMP is slaughter identified, discussed, or analyzed. During the planning process, the Ely Field Office identified where to manage wild horses and an overall view of how to manage wild horses on the public lands. The management of wild horses is limited to Herd Areas identified after the Wild and Free Roaming Horse and Burro Act (PL-195) was passed in 1971. From these Herd Areas, designation of Herd Management Areas (HMA) occurs, which identifies areas that are suitable for the long-term maintenance of wild horses. Within these HMAs, wild horses are free to roam as one multiple-use of many under a specified appropriate management level, so as not to exceed the capacity of the rangeland to support a thriving natural ecological balance.
- The Ely Field Office disagrees that a small number of wild horses are being provided for in the Proposed RMP. The plan identifies 1,695 wild horses that initially are to be managed within the Ely RMP planning area. This will still make Ely Field Office the third largest wild horse manager within the Federal Government.
- The Ely Field Office disagrees that wild horses are not a grazer. All past and current scientific information states that wild horses are indeed a grazer. Further, the Ely Field Office has presented accurate information in the Proposed RMP and Final EIS based upon scientific data, current rangeland management principles, and professional field experience. The Ely Field Office disagrees that a small number of wild horses are being provided for in the Proposed RMP. The plan identifies 1,695 wild horses that initially are to be managed within the Ely RMP planning area. This will still make Ely Field Office the third largest wild horse manager within the Federal Government.
- I19-4 Comment noted.
- I19-5 The priority species listed in Section 2.4.6.2 of the Proposed RMP and Final EIS does include game species, but also includes migratory birds. In addition, Section 2.4.7 of the Proposed RMP and Final EIS addresses special status species most of which are not game species. The text of the Proposed RMP and Final EIS has been revised to take out any discussion regarding the killing of coyotes. The killing of coyotes is not the responsibility of the BLM, and therefore, not part of the Proposed RMP and Final EIS.

Responses to Letter I19

- | | |
|-------|---|
| I19-6 | In response to your comment, the text in Section 4.6 of the Proposed RMP and Final EIS has been revised to specifically include the potential for migratory bird mortality on wind turbines. While the potential impact is acknowledged, it is impossible to quantify anticipated impacts in the absence of specific development plans. That impact assessment would occur in the NEPA analysis associated with specific project reviews. |
| I19-7 | Cheatgrass is an invasive species that has spread across both public and private lands throughout the Intermountain West. Although improper grazing management has contributed to its spread in some situations, fire has probably been a substantially greater factor in its distribution and dominance across large areas of the Great Basin. |
| I19-8 | Comment noted. |

Letter I20

> > To: Bureau of Land Management/Ely Office
> >
> > From: Russell Sherratt
> > Subject: Ely RMP/EIS
> > Date: November 18, 2005
> >
> > Comments on RMP Ely District (#1610 NV-910)

> > All comments made here in reflect changes or
> > additions I would like to see in the RMP Ely District draft.
> >
> >
> > Section 2.5.14.1 Parameter-Transportation Plan
> >
> >
> > Alternative B: close no motorized travel till
I20-1 [> > congress makes a decision on W.S.A. A more reasonable wording would
read "Equal emphasis on ecological system restoration and responsible
recreation would be placed on road and trail designations."
> >
I20-2 [> > Alternative E: close no roads till congress makes a decision on
W.S.A... Existing trails and roads are presently in use today to close
them when they are reasonable to use would be wrong and not in the
interest of local inhabitants.
> >
> >
> > Section 2.5.14.2 parameter-Off-highway Vehicles
> >
I20-3 [> > Alternative B:
> >
> > Point 1 Please change this to include Dry lakebeds and dry washes
should remain open at a minimum.
> >
> > Point 2 Off-highway vehicle use limited to existing roads and
trails.
> >
> > Point 3 Congress has not yet ruled on Wilderness Study Areas I ask
please change this statement till congress rules
> >
I20-4 [> > Alternative C:
> >
> > Point 1 Please change this to include All Dry lakebeds and dry
washers should remain open at a minimum.
> >
> > Point 2 Off-highway vehicle uses limited to existing roads and
trails.
> >
> > Point 3 Congress has not yet ruled on Wilderness Study Areas in
White Pine County I ask please change this statement till congress
rules.
> >
I20-5 [> > Alternative E:
> >
> > Reads same as Alternative B, My comments on Alternative E, are same
as Alternative B: please note that.
> >

Responses to Letter I20

I20-1 Vehicle routes that are excluded from wilderness study area boundaries by cherry-stemmed boundaries would remain open, providing motorized access routes to these areas.

I20-2 Please refer to Response to Comment I20-1.

I20-3 In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify criteria that may be used when designating routes in a project-specific transportation plan. Not all dry washes would be suitable for OHV use; however, some may be designated as trails when transportation plans are prepared for a watershed or group of watersheds. The public will be invited to participate in the transportation planning process. Wilderness study areas will be managed under the BLM's interim management policy until Congress makes a decision on the designation of wilderness.

I20-4 Please refer to Response to Comment I20-3.

I20-5 Your comments will also be applied to Alternative E.

Letter I20 Continued

I20-6 [> >
> > Section 2.5.15.1 Parameter-Special Recreation
> > Management Areas
> >
> > Table 2.5-11: page 2.5-137
> > Comment under the Primary Values column for the Pahrnanagat area
change the primary value to include motorized recreation in the
Primary Values column.
> >
> >
I20-7 [> > Alternative E:
> >
> > Lists nine new special recreation management areas, five of which
are areas in special recreation management areas, that emphasize
motorized recreation (OHV emphasis areas) include my comment including
the Pahrnanagat Area as one of these areas for motorized recreation (OHV
vehicle emphasis areas). Phranagat area is an area that there is a
working partnership with responsible parties and the BLM for
responsible OHV recreational activities.
> >
> >
> > Section 2.5.15.2 Parameter-Special Recreation
> > Permits
> >
I20-8 [> > Alternative B:
> >
> > Clarify are truck races competitive or non
> > competitive.
> >
I20-9 [> > Alternative E:
> >
> > Event's which I attend are very slow speed and not competitive. I
can't see how they can be included under what is listed in the events
section of this paragraph and ask that you make a category or addition
for slow speed non competitive events.
> >
> >
> >
> >
> > Russell Sherratt
> > 6572 Shelter Lane
> > Las Vegas, Nevada 89103
> > Member Nevada United 4 Wheel Drive Ass.
> >
> >
> >

Responses to Letter I20

I20-6 Please refer to management actions REC-2 and REC-4 in Section 2.4.15.1 of the Proposed RMP and Final EIS for a discussion of recreation values/opportunities in Special Recreation Management Areas. Of particular note (in part) is the following component of management action REC-4: *"Using information from the interdisciplinary team and through public scoping, identify different recreation niches to be served in the special recreation management area. Write specific objectives for the recreation opportunities that would be provided and managed."* Thus, the appropriateness of motorized recreation in the proposed Pahrnanagat SRMA would be determined through the interdisciplinary and public process described.

I20-7 Please refer to Response to Comment I20-6.

I20-8 Please refer to Response to Comment I20-9.

I20-9 In response to your comment, the text in Section 2.4.15.2 of the Proposed RMP and Final EIS has been revised to clarify the discussion of competitive vs. non-competitive events.

Letter I21



EDWIN SPEAR
<lady Moose@sbcglobal.net>
10/05/2005 06:57 PM

To elyrm@blm.gov
cc
bcc
Subject DRMP/EIS

- I21-1 I am against any management plan that would limit our already limited hunting access or our ability to enjoy one of greatest heritages ever left to us. The right to bare arms and the right to hunt any were on public lands. It is after all our lands also.If some people do not wish in enjoy these rights, that's there right but that does not give them the right to take it from us. Or does it give the government that right.I am under the impression that the government works for all of us not just a select few. After all the government is all of us not just a select few .We not only enjoy hunting but also enjoy just being out to be able to see many things that most people will never see because they don't spend the time out in the outdoors that we do. And we belong to many organizations that promote the environment and also the management of our animals.So that they will be around for our grand kids and there grand kids and so forth and for you too. I personal belong to SCI, NRA, WITO, And the Wild Turkey Federation. So as you see I am very serious about our hunting lands & our public lands for everyone to be able to enjoy weather they hunt or just camp, hike , fish,ski, take pictures or maybe just sight see., that is there right there is allot for everyone to enjoy don't take that from us. Julie Spear Ely, Nv.
- I21-2
- I21-3
- I21-4

Responses to Letter I21

- I21-1 The Ely Field Office recognizes that hunting is an acceptable use of public land wherever it is compatible with resource management objectives and public safety. The Proposed RMP will only limit motorized access off of designated roads and trails. Access by foot or horse will be allowed in all areas.
- I21-2 Comment noted.
- I21-3 Please refer to Sections 2.4.15, 3.15 and 4.15 in the Proposed RMP and Final EIS for a discussion of proposed recreation management actions, existing recreation conditions, and impacts to recreation resources.
- I21-4 Comment noted. Outdoor recreation is an important consideration for the management of public lands by the Ely Field Office.

Letter I22

Craig Stevenson
3001 Nutwood St.
Las Vegas, NV 89108
(702) 645-2353

28 November 2005

Gene Drais
Project Manager
Bureau of Land Management
Ely Field Office
HC 33 Box 33500
Ely, NV 89301

Dear Mr. Drais:

I have reviewed most of your *Draft Resource Management Plan/Environmental Impact Statement for the Ely District*. I believe it is the better EISs I have seen. I am concerned about the allowances of OHV use, but the document should be sufficiently flexible to corral that use when it reaches its usual excess. My primary concern is the proposed management for paleontological resources.

1) Invertebrate Fossil Collecting Permits

I22-1 [I have been involved in trilobite/invertebrate collecting for only a short time, but I have found the Ely District to contain significant trilobite and other paleontological resources. I am concerned that the regulations proposed in the preferred alternative of the *Ely RMP/EIS for the Ely District* will negatively affect amateur or hobby collecting on federal lands.

I22-2 [The stated concern behind the proposal to require permits is misdirected. If commercial collection is a threat, I recommend that the Bureau and other federal agencies pursue it at market level. This can be easily done by targeting the sale of species which can be tied solely to federal lands. A quick search on the internet using "trilobite" and "Nevada" presents dozens of sites selling trilobites. Some collectors even list the sites, such as Ruin Wash or the Groom Range, on eBay or commercial sites.

I22-3 [Without some enforcement effort, there would be no substantive resolution of resource misuse. These regulations also stands to affect paleontological research.

I22-4 [One thing I have noticed, is that paleontologists rarely have great amounts of time to collect an adequate number of specimens. As a result, species classifications and faunal descriptions sometimes prove inadequate. Amateur collectors working with paleontologists often times have the advantages of proximity to study areas and ample time to better sample the areas.

Responses to Letter I22

I22-1 Comment noted. A registration system should not affect amateur or hobby collectors.

I22-2 In response to your comment, the text in Section 2.4.10.1 of the Proposed RMP and Final EIS has been revised to remove any link between permits and commercial collecting. In the Proposed RMP, the Ely Field Office is not proposing a permit system, but an on-site no-fee based registration system in order for the Field Office to better track use and inform the public of proper use and etiquette in collection of invertebrate fossils.

I22-3 The Proposed RMP contains management actions that set direction/standards for land use management; it does not impose regulations. The management actions contained in the Paleontology section allocate these resources to scientific and public use. Enforcement activities will be ongoing to ensure proper use.

I22-4 Comment noted. Amateur collecting will continue to be allowed under the Proposed RMP.

Letter I22 Continued

- I22-4 Additionally, many localities which prove to be of paleontological value are discovered by amateurs. In just the past year, I have been involved in the discovery of a trilobite fauna in Nevada previously found only in northern Utah. At least two new species of *Olenoides* trilobites appear to exist only in this section. With some direction from Dr. Pete Palmer of the Institute for Cambrian Studies, I am helping to confirm and correlate a second locality of this fauna.
- I22-5 In another area, I have collected specimens from what appears to be several undescribed species of *Albertella* trilobites. One of these may correlate with *Albertella highlandensis* (Eddy and McCollum, 1998), extending the known range of this species.
- I22-6 I agree that commercial (and amateur) collectors can tear up some areas. Even controlled collecting can result in the appearance of small mining excavations dotting the landscape. More often these locations are off of the beaten path and go unobserved by the general public.
- I22-6 I think you will find that most sites are not significantly disturbed until paleontologists have done some work, (Ruin Wash, Andies Mine, Telegraph Canyon, etc.) The publishing of theses and professional papers leads to the popularity of many sites. It is the follow up or secondary work at sites that stands to be negatively affected.
- I22-7 Yet, there is little chance of resources at any one site being eliminated. I have heard other collectors complain that Ruin Wash is played out. The truth is that the “easy” collections are being eliminated. It is often difficult work to uncover fossils locked in rock. Remote locations, limited muscle and age, all affect enthusiasm, which limits the threat to the resource. Depending on numerous factors, several hundred pounds of rock can be moved for little or no reward.
- I22-7 Economic factors relating to fossil collecting are also overlooked in the Draft RMP. Trilobite and other fossil collectors contribute to the local economies. Many collectors camp out, but some stay in motels in Alamo, Caliente, Pioche and Ely. Most buy gasoline and supplies in these areas. I usually purchase gasoline and food in Lincoln or White Pine Counties when I travel to the Ely District to collect.
- I22-8 Returning to the permit issue, if the Bureau is not willing to aggressively pursue illegal sales of invertebrate fossils, it should be hesitant to impose regulations which it will be unable to enforce. Before the Ely District suggests any restrictions on the collection of invertebrate paleontological resources I recommend the following:
- 1) *The Ely District should establish a working group to examine the situation.*
 - 2) *Any regulations should be reasonably compatible with adjacent states, agencies and BLM districts.*
 - 3) *The Ely District should have the time and resources to reasonably enforce any rules. The preferred alternative does not articulate reasonable goals and objectives that are attainable under current staffing.*

Responses to Letter I22

I22-5 Comment noted.

I22-6 Comment noted.

I22-7 Thank you for comment. The text in Section 3.23 of the Proposed RMP and Final EIS has been revised to expand the list of recreation and tourism activities that occur in the Ely RMP planning area. The economic contributions of all such activities is recognized collectively in both Sections 3.23 and 4.23. However, individual assessments are beyond the scope of the analysis. The revisions do not affect the basic impact conclusions presented in the Draft RMP and EIS.

I22-8 Please refer to Response to Comment I22-3 for a discussion of management actions for invertebrate fossil collecting. The Proposed RMP does not contain restrictions on the collection of invertebrate paleontological resources; however, enforcement activities will be ongoing to ensure proper use. In response to your comment, the management actions in Section 2.4.10 of the Proposed RMP and Final EIS has been revised to clarify the discussion of site-specific project plans. The Ely Field Office would be happy to work with any group interested in assisting with identifying and monitoring paleontological resources. Also in response to your comment, the text in Section 4.2 (Goals) has been revised to clarify the discussion of objectives attainable under current staffing.

Letter I22 Continued

I22-8 4) *This issue should be dealt with in a sub-plan so that a more specific interest group can be pursued.*

I22-9 **2) Lands Disposal**
Also of concern to me are the lands disposals shown on Map 2.4-21. The Lincoln County Land Act has already identified five square miles of land at Oak Springs, including the spring itself. This RMP suggests another five square miles for disposal to the north of that land. This RMP area contains sections studied by paleontologists Dr. Palmer, Dr. Linda McCollum and Dr. Mark Webster. This land includes or is immediately adjacent to the area promoted for trilobite collection by the Bureau. There are also unstudied *Glossopleura* biozone deposits within this suggested disposal area. Additional paleontological sites within lands suggested for disposal in the preferred alternative are:

- Lower Antelope Canyon, north of Caliente
- Arizona Peak northwest of Pioche
- Large portions of the Pioche Hills.

I22-10 One disposal area appears to contain some old mill tailings ponds below the Castleton site, which I believe remain somewhat toxic.

I22-11 **3) Groom Recreation Area**
I believe that the Bureau uses poor judgement to suggest a Groom Recreation Area. Recreation in that area would center upon the easier areas to access. The Andies Mine would certainly be one such activity area. The mine produced mercury. There would probably be a need to do some clean up before the area should be promoted for recreation.

I22-12 Because the Groom Recreation Area would be adjacent to the Groom Lake area of the Nellis Test and Training Range, I am primarily concerned about conflicts with the military mission. The Air Force has a history of over-reacting. Poorly controlled recreation stands a good chance of resulting in the loss of this area for all public use.

The northern Groom Range contains paleontological resources from the lower Cambrian Pioche/Carrara formations up to what appears to be upper Cambrian Dunderberg shale.

I22-13 In summary, I am strongly opposed to Alternative E, with regard to management of paleontological resources. The Bureau's concerns are somewhat overstated. It is not a reasonable solution to begin a permitting process that cannot be adequately managed by the Bureau.

Sincerely,

Craig Stevenson

Responses to Letter I22

I22-9 Please refer to Section 2.5.12.2 [lands] and 2.4.10 [paleo] in the Proposed RMP and Final EIS for a discussion of land disposals. Lands identified for disposal would have to be inventoried for resources (including paleontological resources) prior to disposal. If the lands contain resources eligible for National Natural Landmark status, they would not be subject to disposal. The paleontological resources mentioned in this comment would be identified during inventory and if they meet the National Natural Landmark criteria, they would be nominated to the NNL.

I22-10 In response to your comment, the land disposal legal descriptions and maps have been updated in coordination with the County. See Appendix I and Maps in 2.4.12 in the Proposed RMP and Final EIS.

I22-11 In response to your comment, the Area 51 special recreation management area has not been included in the Proposed RMP.

I22-12 Please refer to Response to Comment I22-11.

I22-13 Please refer to Responses to Comments I22-2 and I22-8.

Letter I23

Nov. -22- 2005

To whom it may concern

I23-1

I'm writing this letter to express my concern about the land use permits for the purpose of hunting going to open bid.

I do feel that there needs to be some restrictions on the number of permits for each given region. However I've not yet heard the best solution for this problem.

I23-2

I feel that the master guides that have been receiving permits for the last five years should be given the first chance also the master guides who are residents to the state or even to the county which they reside and do there guiding should be given first chance for permits in that area.

Example a master guide living in Lincoln co. Nevada should have first chance to receive permits to hunt the units in that county or units that overlap into the adjacent counties before a guide from another state or county.

I23-3

I don't know if this matter has been brought up to the Nevada guides association or not but this may be a way to receive more input.
If I can be of any help I will do my best to help.

THANK YOU

Lyle Shane Stever



Shane Stever
Box 234
Pioche NV. 89043
775-962-5898

I23-4

If a permit expires and is not renewed then that spot could go to bid.

Responses to Letter I23

I23-1

In response to this and similar comments, the management action in Section 2.4.15.2 of the Proposed RMP and Final EIS regarding outfitter and guide permits has been revised.

I23-2

Please refer to Response to Comment I23-1.

I23-3

Please refer to Section 5.5 in the Draft RMP and EIS and Proposed RMP and Final EIS for a listing of those organizations to which the Draft RMP and EIS and Proposed RMP and Final EIS were sent.

I23-4

Please refer to Response to Comment I23-1.

Letter I24

11/27/2005

Bruce Flinn
BLM Ely Field Office
RMP Project Manager
HC 33 Box 33500
Ely, NV 89301-9408

elyrmp@blm.gov

Thank you for this opportunity to comment on the Draft Resource Management Plan / Environmental Impact Plan for the Ely District.

- I24-1 1. My first comment regards an inaccuracy in information. Mineral Survey No.1905 (MS 1905) is an irregularly-shaped group of 6 patented (privately owned) mining claims that is shown in the RMP to be located in T 6S, R 70E, section 31 and T 6S, R 70 E section 31 and T 7S, R 70E, section 31 and T 6S, R 70 E sections 5 and 6. MS 1905 is actually located in T 6S, R 70E, sections 32 and 33 (and perhaps 29). The actual location is noted on the Master Title Plat marginalia (9/2/2004) for the appropriate townships, was to be corrected in the Geographic Coordinate Data Base, and is documented in correspondence i.e. David J. Clark's letter dated August 11, 2004 [9600(NV-952)]. It is likely that this inaccurate information led to inappropriate decisions and recommendations in the past and may lead to additional inappropriate decisions in the future if not corrected. The accuracy of this information is potentially vital to BLM personnel as they consider actions as varied as fire planning and control, roads, vegetation planning and activities and I'm sure many other tasks. The accuracy of the information is vital to the general public as they plan activities as well (fuelwood, Christmas Trees, post and pole etc.). There has been at least one NEPA comment solicitation in which the location of this property has been a factor.
- I24-2 2. re: 2.5.14 Travel Management and Off-Highway vehicle Use
Map 2.4-32 seems to represent the currently designated roads and trails (referenced as such in 2.5.14.2 Alternative D). A road currently exists that provides access to Mineral Survey No. 1905 (MS1905). The road begins in the vicinity of the Rolling Hills Reservoir in Section 31 of T 5S, R 70E and extends SSE, through Mud Springs Saddle, extends down and along what is labeled Mud Springs Wash on the 1:24K and BLM Surface Management Status maps. The road currently ends adjacent to MS1905. The road to MS1905 was originally a wagon road that dates possibly to the period of claim development before 1900. The road has been improved at various times and is clearly visible on aerial photographs. This road provides access for hunters and no doubt others in addition to providing access to MS1905. The road to MS1905 is not included on Map 2.4-32. It is likely that, if the location of MS1905 had been accurately located in BLM records, this road, which provides access to the privately owned MS1905, would be on the inventory of designated roads and trails. This "new" information should be included on the designated inventory of roads and trails and Map 2.4-32.
- I24-3 There are some roads beyond (south of) MS1905 that were developed specifically for exploration or development and have been reclaimed. Those roads should remain closed and reclaimed.
- I24-4 I spoke with the individuals* (see note at the end of my comments) who have grazing assignments in the Barclay allotment. Each of the three individuals feels it is important that this

Responses to Letter I24

- I24-1 Thank you for your comment. These kinds of corrections need to be made in the Geographic Coordinate Database. Your comment has been forwarded to our Nevada State Office for resolution. During site-specific implementation of the RMP, the Master Title Plats and the Geographic Coordinate Database will be consulted to evaluate land status.
- I24-2 Map 2.4.14-1 is based on roads currently known to be maintained by federal, state, and county agencies. To the extent that the road map files used were accurate and up-to-date, this map is inclusive of such roads. However, no warranty is implied regarding the completeness or data accuracy of those data sources, particularly at the small scale necessary for this document. The type of issues raised in your comment will be considered by the Ely Field Office when transportation plans are developed through coordination with local agencies, residents, and interest groups.
- I24-3 Comment noted. The Ely Field Office does not normally reopen reclaimed roads.
- I24-4 Please refer to Response to Comment I24-2.

Letter I24 Continued

- I24-4 road to the area of MS1905 should be officially recognized and remain open. Each of them considered their own use of the road as well as the general public use for hunting and recreation.
- I24-5 It is possible that other areas of the district also have unrecognized roads and trails that are not included on Map 2.4-32. The designation of roads and trails must be closely re-examined before far-reaching decisions are finalized.
- I24-6 In general, this very important designation of roads and trails is not supported with a tabulation of information, the maps are marginally adequate for discerning what is designated as a road or trail, there is no indication of what criteria were used to designate a road or trail or what criteria were used to exclude a road or trail. It is also not clear what the long-lasting ramifications are of a road or trail being included on or excluded from Map 2.4-32. A classification of roads is presented in Section 3.14.1 but there is no indication of which roads found on Map 2.4-32 fit into any of the Levels presented.
- I24-7 3. re: 2.5.12 Lands and Realty - Disposal
An inconsistency or inaccuracy is present between Maps 2.4-20 and 2.4-21, the text, and Appendix O which represent Lands Available for Disposal under Alternative E and perhaps others Alternatives.
- I24-8 4. re: 2.5.12.2 Lands and Realty – Disposal
Some of the land that is proposed for disposal include maintained roads, and roads that provide access to privately held property (specifically MS1905). Although it is not discussed in the RMP, there is a need to preserve current travel options on existing roads and trails even in the event of the disposal of land including access to private property. This is addressed in part under 2.5.12.1 Lands and Realty – Retention where it indicates that “Lands which preserve public access to recreation opportunities would be retained.
- I24-9 Also, I oppose the disposal of any BLM land in isolated locations and relatively small (or large) parcels as seems to be proposed. Some of the land proposed does not fit the description required for disposal. Nor is it sound based on the watershed management philosophy being adopted. Disposal of the indicated parcels in the FifeMountain/East Pass/Mudsprings/Sams Well area (T 6S, R 68E; T 6S, R 69E; T 6S, R 70E; T 7S, R 69E) is not appropriate.
- I24-10 5. re: 2.5.14.2 Travel Management and Off-Highway vehicle Use – Off-Highway Vehicles
Motorized vehicles should be restricted to existing roads and trails – not necessarily only those roads shown on Map 2.4-32. I cited one example of a road which has been in place for probably 100 years. Travel must be allowed on those roads which currently exist but off-highway use should not be permitted in areas where no roads exist. The designation of scenic Byways could have a very large impact on accessibility for people into relatively trail-free areas. The No Off-Highway Vehicle policy is critical to preserving the current conditions throughout the district.
- I24-11 6. re: 2.5.13.1 Renewable Energy – Solar and Wind Energy
Currently the benefits of wind energy are not close to the costs that would be incurred, particularly in the scattered and isolated areas available in the study area. The potential harm to wildlife and visual experiences of an operating windfarm in addition to the required building of

Responses to Letter I24

- I24-5 Please refer to Response to Comment I24-2 regarding Map 2.4-32. In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify how comprehensive travel management planning will occur in the Ely RMP planning area.
- I24-6 Please refer to Response to Comment I24-2.
- I24-7 In response to your comment, maps in 2.4.12 in the Proposed RMP and Final EIS have been modified.
- I24-8 In response to your comment, the text in Section 2.5.12.2 of the Proposed RMP and Final EIS has been revised to clarify the discussion of land disposal and to specify that disposed lands would be subject to valid existing rights, such as maintaining public access.
- I24-9 In response to your comment, all of the area for the indicated parcels has been removed from the Proposed RMP (see Appendix I).
- I24-10 Please refer to Response to Comment I24-5.
- I24-11 The Proposed RMP does not designate areas for wind and solar energy development, and the text and map titles in the Proposed RMP and Final EIS have been changed to clarify this. Changes in technology may change the potential for renewable energy development and which areas are suitable. All applications will be subject to NEPA analysis and the Wind Energy Development Program Policies and Best Management Practices published in conjunction with the Record of Decision for BLM's Final Wind Energy Development Programmatic EIS (Appendix F, Section 3, of the Ely Proposed RMP and Final EIS). The type of issues raised in your comment will be considered by the Ely Field Office when project-specific plans for wind energy development are received and evaluated.

Letter I24 Continued

- I24-11 | roads and other infrastructure are too high a price. If it could provide a cost-effective solution I would be in favor but it currently does not make sense.
- I24-12 | 7. re 2.5.3 Water Resources
The water resources of the area are critical to long term life and health of every aspect of the district. Very little is known or quantified about the nature of the water resources in the area. State Engineer perennial yield values presented in Table 3.3-1 are based on what may be the best available information, but it is relatively untested models, not measurements, and the real effects of significant pumping are unknown. All models that I am aware of show a significant drop in water levels with time. Spring data shown in Map 3.3-1 is not supported with tabular data and is not comprehensive or representative of what actually exists. Additional baseline information should be collected before massive pumping begins to affect the water levels and spring output. This additional data should include a comprehensive inventory of springs, water level values, and precipitation/snowfall. There should be a comprehensive inventory of springs and other "green areas" that includes flora and invertebrates. Detailed aerial photos should be obtained as support for these inventory activities in color, infrared, and multispectral modes as well as black and white. Techniques such as InSar (Interferometric Synthetic Aperture Radar), currently being used by Nevada Bureau of Mines and Geology, should be used to establish baseline measurements for ground subsidence in all potentially affected basins.
- I24-14 |
- I24-15 | There is much existing information that could be collected on the springs, water sources, and areas where water is near to the surface and there is a great deal of new data that could be collected on a watershed level to provide a baseline of existing resources. The development of a baseline can provide a means to determine when and how natural cycles are impacting the water resources and how the pumping of these resources causes impacts as well. All information, data, and photographs concerning these water resources should be available to the public.
- I24-16 | 8. re: 2.5.15.1 Recreation – Special Recreation Management Areas
No special recreation management areas are appropriate.
- I24-17 | 9. re: 2.5.15.2 Recreation – Special Recreation Permits
No motorcycle events should be permitted off of currently designated roads and trails. No truck events should be permitted off of currently designated roads and trails.
- I24-18 | 10. re: 2.5.16.1 re: Livestock Grazing
Grazing is a required management tool.
- I24-19 | 11. re: 2.5.19 Watershed Management
Watershed management seems like a sound tenet of district-wide management but it must be acknowledged that many important aspects, such as water resources and wildlife, do not stop at watershed boundaries.
- I24-20 | 12. re 2.5.22 Special Designations – Back Country Byways
It is unclear if roads as they exist today would receive the Byway designation or if construction/maintenance would be required. In either case the impact of increased travel could

Responses to Letter I24

- I24-12 | In response to your comment, the text in Section 3.3 of the Proposed RMP and Final EIS has been revised to emphasize the preliminary nature of these water yield estimates and that they will change over time as more groundwater investigations are conducted in the planning area.
- I24-13 | The map information is the most extensive available for the Ely RMP planning area. There are no "data" associated with the map; it is simply provided to generally depict the distribution of resources and to identify possible locations of interest for future water resources investigations and assessments. Investigations and assessments for other specific NEPA actions, as well as data from monitoring programs, would further characterize these resources and potential impacts to them from specific project proposals.
- I24-14 | No pumping of groundwater is proposed in the Ely RMP. NEPA regulations direct federal agencies during their preparation of an EIS to reduce the accumulation of extraneous background data [40 CFR 1500.2(b)]. Thus, the Ely Field Office assembled the information that was necessary to formulate management actions and make a reasoned choice among alternatives. Where data that is important in making a decision is incomplete or unavailable, this must be disclosed in the EIS [40 CFR 1502.22]. Please refer to Section 4.1.4 in the Draft RMP and EIS and Proposed RMP and Final EIS for a discussion of Incomplete and Unavailable Information. The data that is requested in this comment, while potentially of interest, is more detailed than that required to prepare an RMP/EIS for the Ely planning area. Separate NEPA analyses will be prepared for any groundwater development projects, and data collection may be appropriate for those projects.
- I24-15 | Please refer to Response to Comment I24-14 for a discussion of data collection.
- I24-16 | Comment noted.
- I24-17 | Comment noted. Road designation is a process that will occur with public input subsequent to the approval of the RMP.
- I24-18 | Please refer to Appendix H in the Draft RMP and EIS and Proposed RMP and Final EIS for a discussion of Tools and Techniques, including grazing as a management tool.
- I24-19 | Please refer to Section 1.7.3 in the Proposed RMP and Final EIS for a discussion of Management by Watersheds. This management approach recognizes that many environmental factors and affected resources overlap multiple watersheds, but the watershed unit is the most practical geographic entity upon which to base resource management for the overall Ely RMP decision area.
- I24-20 | Please refer to Response to Comment I24-5. Designated Back Country Byways would be maintained as necessary to allow their designated use.

Letter I24 Continued

I24-20 have a tremendous impact conditions adjacent to the byways. Off-Highway travel must be limited, particularly in areas of increased road traffic such as would occur adjacent to the newly designated Byways.

I24-21 13. re: 3.3.1 Water Resources – Existing Conditions
It is unlikely that the carbonate aquifer and the basin fill aquifers are independent as implied. Pumping of either aquifer will impact the other. Comprehensive inventories of water resources and current uses must be developed to understand existing conditions.

End of comments.

*Note about privacy and need for more information.

I was reluctant to use the names of the individuals who are assigned the grazing in the Barclay allotment in this a potentially public document. If it is appropriate to use their names here it is OK but if it is not required, I respect their privacy. I spoke with Arlin Hughes, Fenton Bowler, and Ken Newby (Newby Cattle Co.) during the week of November 21, 2005. Each of them expressed a desire to have the road remain open and officially recognized. They may or may not write their own comments regarding the RMP. The chore of reading the RMP and responding seemed very daunting to some.

I would like to receive the Proposed RMP/Final EIS on CD when it is available.

Thank you,

Tim Vogt
9033 Sandy Shores Drive
Las Vegas, NV 89117

timv@earthlink.net

Responses to Letter I24

I24-21 The text in Section 3.3.1 of the Draft RMP and EIS and Proposed RMP and Final EIS does not imply that the aquifers are independent. Please see the third sentence of the second paragraph.

Letter I25

Please respond to <d.wade@metro-electric.net

Vegas Valley 4 Wheelers P.O. Box 95884 . Las Vegas, Nevada 89193-5884
www.VV4W.org

Attn: Ely fieldoffice BLM comments on land use decisions.

I25-1

We want to see more heritage tourism and motorized recreation in the more rural areas of Nevada. The Pahrangat area and the range between Alamo and Ash Springs, has a technical trail system and nice camping areas, my family has used since 1972. I want to be sure these trails and access roads remain open for future generations to explore and enjoy. This would be a great area to develop into a posted trail system for motorized recreation Kiosks showing plant, animal, native, historic, and other points of interest should be posted or self-guided. The Alamo and Ash Springs area is a great area to develop into a posted trail system for motorized recreation Kiosks showing plant, animal, native, historic, and other points of interest should be posted or self-guided.

I25-2

hike for less mobile persons, to enjoy the vast wilderness resources our great state offers. For example, my father, a disabled Vietnam Vet who can hardly walk unassisted on flat concrete. It would be impossible for him to explore our wilderness areas without the use of a four wheel drive. Please keep in mind, not everyone can ride a horse, or hike even short distances. Wheel chairs and walkers are not easy to negotiate over uneven terrain, a SUV is much safer and more comfortable for disabled Americans who want to explore. It is our responsibility to allow less fortunate persons the freedom to move freely through our state. Alternative (D) in your proposal is, "way out there," and I don't mean that in a good way. It is the exact opposite of Alternative (A) the current, "go do what you want, where you want, "Willy-Nilly roam free, who cares? I feel Alternative (E) shares enough in common with Alternative (B) and (C) to effectively get the most out of the land for responsible motorized recreation. As well as preserving our current trail resources and giving us the opportunity to restore the habitat with future projects.

I25-3

It is so important to keep a strong partnership with the organizations and appropriate entities who have helped the BLM field offices in the past (SloneCanyon). These organizations have the manpower and resources to help, in getting into an area (hauling in personnel and equipment). On the same note, (we can haul out large items too heavy to carry.) If you close the trails and roads, how will you get the people and things (in) or (out) to complete any preservation or restoration projects? We want to keep the positive rapport we currently share with the BLM field office in Ely. We want to remain available, willing, and able to help with future projects or recreational public events. In Alternative (B) what does open, limited, and closed mean and where? When talking about, "open to cross country off highway = 0 acres".... OHV "limited to designated" (should say) "limited to (existing) roads and trails within the 10,338,000 acres. This should also be reflected in Alternative (E). Why would you close down Dry Lake Beds? They are a nice flat place to camp to enjoy the wonders of the desert that surround them.

I25-4

Thank you for your time, and please consider my points before any Alternative is set in stone. I can be reached by phone for future help at (702) 353-7355.

I25-5

I25-6

DarrellWade, TrailBoss Vegas Valley 4Wheelers.

Responses to Letter I25

I25-1

The type of issues raised in your comment will be considered by the Ely Field Office when project-specific plans are prepared or evaluated.

I25-2

Comment noted.

I25-3

Comment noted. The management actions in Alternative E have been incorporated into the Proposed RMP presented in this document.

I25-4

Please refer to Response to Comment I25-1.

I25-5

In response to your comment, the text in Section 2.4.14.2 of the Proposed RMP and Final EIS has been revised to clarify the discussion of off-highway vehicle use designations. Please note that the Proposed RMP would limit use to "designated" and not "existing" roads and trails.

I25-6

The designation of dry lake beds as open was considered in the Draft RMP and EIS and Proposed RMP and Final EIS as part of Alternative C. However, it was not incorporated into the Proposed RMP. Not all dry washes would be suitable for OHV use; however, some may be designated as trails when transportation plans are prepared for a watershed or group of watersheds. The public will be invited to participate in the transportation planning process.

Letter I26

Bureau of Land Management
Bruce Flinn, RMP Project Mgr
HC 33 box 33500 Ely, Nv 89301

NOV
2016

Re: Comments on Ely District RMP

I26-1

I would like to record my comments on the transportation planning and OHV management alternatives outlined in the RMP draft. Specifically, I would like you to consider amending alternative E in sections 2.5.14.1, 2.5.14.2 and 2.5.15.1 to allow for the continued use of existing singletrack trails by motorcycles in certain areas. In general, these areas would be areas of historic motorcycle race courses, such as the area around Alamo, the area to the immediate south of Mail Summit, the area between Panaca and Caliente, the area west of Caliente towards Chief Mountain, the area near Jake's Wash, and area between Squaw Peak and Robinson summit on the north side of highway 50, as well as any other areas where motorcycle competitions have traditionally been allowed on existing roads and trails.

I26-2

The reasons for this request are as follows:

1. I believe that planning of motorized singletrack (closed to ATV's) has gone largely ignored in this district, yet this is of primary importance for off-road motorcycle recreation enthusiasts. Some emphasis on motorized singletrack is appropriate and justified considering the number of responsible motorcycle enthusiasts in this district.
2. The BLM has been using ATV's to inventory roads and trails, but there are many trails that are not passable to ATV's without danger to the rider or the environment. Some of these trails are not often used, but have been on the ground for years, and are likely to be missed by a route designation process. This will probably result in unjustified closures of interesting and sustainable motorcycle routes.
3. These trails are also generally very suitable for mountain bike use. The typical mountain bicyclist is much more interested in primitive singletrack trails than in the jeep roads that are so frequently designated as official bicycle routes. Currently virtually all interesting mountain bike routes in the Ely District originated as motorcycle trails, and there is no reason to close them to motorized use. In fact, for many trails, closure to motorized use would likely mean deterioration of the trail to the point that it became unreasonable for bicycle travel at the current level of use.

I26-4

I26-5

Additionally, I would urge that only the more densely used areas be considered for management under a strict version of alternative E with respect to 'designated routes'. Much of the district could be managed under the same more permissive 'existing roads and trails' strategy with little worry of excessive impact. This strategy appears to be highly successful in many areas of Utah. Considering the size of the Ely district, and the available staffing, it will take decades of time and huge sums of money to go through a comprehensive route designation process. Trying to do this for the entire district makes it likely that the process will be done overly hastily, especially in the higher-density areas

Responses to Letter I26

I26-1

In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify how comprehensive travel management planning will occur in the Ely RMP planning area.

I26-2

Please refer to Response to Comment I26-1.

I26-3

In addition to four-wheel all-terrain vehicles and four-wheel-drive trucks, the Ely Field Office has also utilized motorcycles in accomplishing the inventory of existing routes and ways. During site-specific transportation planning, the Ely Field Office will hold public scoping meetings to address completeness of the route inventory and public issues, concerns, and access needs, such as single-track route management.

I26-4

Please refer to Response to Comment I26-1.

I26-5

Please refer to Response to Comment I26-1.

Letter I26 Continued

I26-5

that require the most careful management. I believe this process will be most effective if the BLM bites off chunks it can chew, and restricts the 'designated routes only' areas to those areas that require that level of management, and that the BLM has the resources to inventory, designate, and sign.

Sincerely,

Handwritten signature of Mark Weaver in cursive script.

Mark Weaver
850 Murry St
Ely, Nv 89301

11/22/05

Letter I27

Stephen Williams
987 Perfect Berm Ave.
Henderson, Nv, 89015
(702) 279-0326

- I27-1 I would like to start by saying I am 15 years old. I do not do drugs or anything bad like that. My favorite hobby is riding "OHV's" and racing my dirt bike. My friends and me get together and ride. We are not the kind of kids that cause trouble or do anything bad. I work hard in school so I can look forward to riding my OHV. I think, it is wrong that the BLM wants to close off our riding areas and make it so we cant ride. Riding "OHV's" is one of the best sports out there. It keeps you in shape, you work hard towards it and you don't sit around and do bad stuff. If the BLM closed all the riding areas, kids would have nothing good to do. They would most likely cause trouble and pick up bad habits. Also how would we see the sights we see when we ride? We wouldn't, if you can't ride to them there wouldn't be anything worth seeing. And exploring, that's how the people in this country have got us to where we are now. Without it there would be nothing.
- I27-2 I am not trying to change all the rules or anything. I just wanted The BLM to hear from my perspective; I know the BLM hears from thousands of angry adults, I am asking that you (the BLM) consider my comments when making your final decision on the RMP. Remember kids our age, are the future of this country and the future users of the public land, we should have a say in our future and how our public lands will be managed for our generation.
- I27-3 I am asking that all existing trails, roads, race courses and washes remain open for OHV use and that equal amounts of 11.4 million acres that used to be classified as open remain classified as open. I would also ask that the word "designated" be removed from the RMP management plan and be replaced with the word "existing".
- I27-4

Thank you for your time,

Stephen Williams

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Responses to Letter I27

- I27-1 The Ely Field Office recognizes that off-highway vehicle use is an acceptable use of public land wherever it is compatible with resource management objectives and does not intent to "close off" most riding areas. In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify how comprehensive travel management planning will occur in the Ely RMP planning area.
- I27-2 Comment noted.
- I27-3 Thank you for expressing your concerns. One of the goals of the Ely RMP is to maintain lands within the decision area for use by future generations.
- I27-4 In response to this and similar comments, the text in Section 2.4.14.1 of the Proposed RMP and Final EIS has been revised to clarify criteria that may be used when designating routes in a project-specific transportation plan. Not all dry washes would be suitable for OHV use; however, some may be designated as trails when transportation plans are prepared for a watershed or group of watersheds. The public will be invited to participate in the transportation planning process.

Letter I28

- I28-1 [To whom it may concern,
I have already sent in my comments but I left out one important issue. The BLM really needs to look at maintaining access to our public lands when they dispose of lands through auction or other means. Along Highway 93 between Panaca and Caliente for example since the release (disposal) of lands in this area some existing roads that were used for access to the Chief Mountain area were blocked. These roads were open until the public land was disposed of. Buck Board Canyon in the Caliente area is another access that has been blocked by a rancher. You can no longer access Buck Board Canyon from Rainbow Canyon. There are other areas also throughout the county that have been blocked. How does the BLM plan to do to ensure that these access points are not lost when you give Lincoln County there land from the Lincoln County Land Act or through future auctions? I hope that someone in your office is making sure no access points are going to be lost. Please make accommodations for this issue in your RMP. Public Land is not much use to the public if we cannot access it.
- I28-2 [I still believe that the best way to manage this land is by just keeping the land open and not changing anything, the current plan seems to have worked fine for many years, why change something that isn't broke.
- Thank You
- Anthony Z. Livreri

Responses to Letter I28

- I28-1 In response to your comment, the text in Section 2.4.12.2 of the Proposed RMP and Final EIS has been revised to clarify access to public land following land disposals.
- I28-2 Thank you for expressing your concerns. The current land use plans are more than 20 years old and need to be updated to address new issues and management directions.