

Rose Strickland

1685 KINGS ROW, RENO, NV 89503

4-18-80

R. Kahler Martinson, Regional Director
Fish and Wildlife Service
Lloyd 500 Building, Suite 1692
500 N.E. Multnomah Street
Portland, Oregon 97232

Re: ARW-PRO

Dear Director Martinson,

I am writing concerning the Renewable Natural Resources Management Plan for the Sheldon National Wildlife Refuge, Draft Environmental Impact Statement.

As an environmentalist, I was very supportive and actively campaigned for the transfer of Sheldon from the Bureau of Land Management to Fish and Wildlife. I was familiar with the poor condition of the Refuge land and was very hopeful that F&W would "manage Sheldon as a representative area of high-desert habitat for optimum populations of native plants and wildlife." It is with great disappointment that I read the draft EIS and found out that F&W proposes to, in effect, continue with the dominant land use, despite its adverse effects on wildlife habitat. The Sheldon preferred alternative is no different from BLM developed alternatives and in fact is worse than BLM's Cowhead-Massacre preferred action. The only innovative part of the Sheldon draft EIS was the redesignation of grazing by domestic livestock as "vegetative manipulation." I do understand that the deteriorated condition of the Refuge is a result of this "vegetative manipulation." To learn that F&W proposes to use the cause to cure the problem stretches my credulity in F&W and its commitment to optimum wildlife habitat.

The draft EIS suffers from many procedural problems. One shared with most BLM EISs is the poor selection of alternatives. The alternatives are then evaluated in the least favorable light in order to justify the preferred alternative.

Information in the draft EIS was so scanty overall that it was impossible to truly compare the alternatives and their impacts on range condition. For example, there was no summary estimation of range conditions - excellent, good, fair, and poor. While I recognize the limitations of very general information, nevertheless, for review and comparison purposes such a summary should be included in the final EIS. Another omission that should be rectified in the final EIS is data on current AUMs permitted, voluntarily not used by the permittees, and projected in various alternatives.

It appeared from some of the discussion that certain actions have already been instituted by F&W, even though their impacts are still being studied in the EIS process. Information should be provided in the final EIS on:

1. # of wild horses removed since F&W assumed sole control of Sheldon.
2. amount of cattle reduction in this same period.
3. kinds and amount of "range improvements" such as fencing, chemical treatments, etc. in this same period.
4. 197,000 acres are proposed to be set aside for exclusive wildlife use. How many of those acres are already excluded from grazing?
5. what are the results of the above actions on range conditions?

I certainly don't want to discourage F&W from attempting to improve wildlife habitat in Sheldon. However, for the benefit of the reviewer, actual actions and their results should be identified.

The best thing about the Sheldon EIS is the use of CRMP as a method to maximize public participation in a more direct way than commenting on a prepared document, such as I am currently doing. That the high level of interaction among interested land users produced a vegetative manipulation assumption and alternative is disappointing, but not too surprising. CRMP is not a panacea and will not solve all our public land problems, but I support its attempt to resolve land use problems.

The preferred alternative is based on an assumption that "improving vegetative condition and vigor will result in enhancement of wildlife habitat which, in turn, will ultimately result in increased diversity and abundance of native plant and wildlife species." The key to improving vegetative condition and vigor is the use of controlled cattle grazing as the primary means for managing vegetation. The "proof" of the efficacy of controlled grazing is cited in the Little Sheldon grazing program.

F&W addressed the possibility that the assumption was incorrect in the custodial maintenance alternative. The analysis of this alternative indicates that removing grazing pressure from domestic livestock and wild horses would significantly improve watershed, vegetation, and wildlife habitat. Making another assumption, F&W then speculated that wildlife would not be able to increase in numbers sufficient to utilize increased forage after 10 years. Such self-serving reasoning to downplay this alternative is hardly professional and appears to be a thinly disguised way to justify the absolute necessity for cattle grazing on a wildlife refuge.

It is hard for me to believe that wildlife can not possibly get along without cattle hedging the shrubs

and clearing rank grasses. What did wildlife do prior to the introduction of cattle and sheep on their native ranges?

The "proof" of successful vegetative manipulation is as tenuous as the logic for it. The Little Sheldon program was not explained in any detail. In Appendix F, the monitor admitted that range comparisons could not be made between 1964 and 1978 because of missing 1964 data. His conclusions started "...it is very likely..." Perhaps the small areas of excellent range in the Little Sheldon were already excellent or good in 1964. Perhaps range excellence is due to removal of grazing not prescribed grazing. Much more information is needed to justify "vegetative manipulation."

The majority of the data documents the adverse impacts of cattle grazing on the diversity of vegetative communities, vegetative vigor, degraded riparian areas, and implicitly on wildlife. There was disappointingly little information on the actual effects of various grazing systems on antelope. Chemical vegetative manipulation adversely affects most wildlife. It is well documented that fencing adversely affects wildlife even cattle. Without cattle there would be no need for fencing and little need for chemical treatments. Some repair to riparian areas is needed with or without cattle.

The data on wild horses was incomplete and unclear. The draft EIS stated that 20,000 AUMs/year were removed by cattle over the last 20 years. The actual number of cattle on the range over these 20 years was not given. From 1971-1977, the EIS states that 14,000 AUMs/year were taken by horses. Even given the fact that horses graze year-round, how could hundreds of horses consume 70% of what several thousand cattle consumed? As is usual in past EISs, overgrazing is apparently blamed on wild horses and burros. F&W seems to have little difficulty in justifying removal of wild horses because of reputed overgrazing, but how many cattle have been removed? While horses have contributed to degradation of riparian areas, how does one distinguish wild horse overgrazing from cattle overgrazing? On p. IV-9 is the statement that "any herbivore would increase the time for range recovery." Are cattle defined as herbivores? Explain the inconsistency of range-recovery retardation of herbivores and the wildlife benefits of "vegetative manipulation" by cattle. Since riparian areas are to be fenced (in the preferred action) to prevent cattle damage, would not horse impact also be prevented? The EIS has presented no justification for reducing the wild horse population. There is no way to ascertain from the EIS the percent population already reduced or the justification for the 75-150 horses

proposed to remain.

The analysis of economic impacts was rather limited. I do not believe that F&W is authorized by any law to preserve ranching as a way-of-life. No such protection exists for the disappearing small farmer or the family grocery. In our capitalistic system, we are often forced to change jobs to assure sufficient income to support our families. Unless preservation of the family rancher becomes a national priority, I do not believe that F&W should preserve marginal or overextended ranching operations at the expense of optimal wildlife habitat.

F&W must operate, however, within legal constraints. Legal constraints include grazing on the Refuge as long as it does not adversely affect wildlife. It appears very clear to me from the data presented in the EIS that uncontrolled grazing does adversely impact wildlife in dozens of well documented ways. There is no way to determine from the data presented whether controlled grazing will continue to adversely affect wildlife or whether it will have the benefits speculated on in the preferred alternative. I do agree that some cattle grazing may have some beneficial impacts on wildlife habitat. How much grazing is the question.

Part of the answer must be an effective monitoring program to determine the adverse or beneficial effects of any action or no action.

With great reluctance and many reservations, I do support the preferred alternative. I assume that some management will be better than uncontrolled grazing. However, if the monitoring system does not become operational for whatever reason, I will withdraw support from the preferred alternative and support custodial maintenance with no treatments. (I do not support the assumption that vegetative manipulation of any sort is required.) If the monitoring system becomes operational and does not show the expected benefits at the end of two grazing systems, I likewise will support only custodial maintenance and the removal of all domestic livestock and wild horses in a five-year phase out.

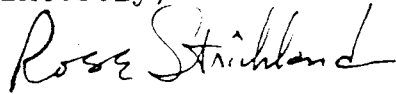
While I feel that my criticisms of the draft Sheldon EIS are just, I do support the F&W objectives of increasing diversity in vegetative communities, of increasing plant vigor, of repairing damage to riparian

p. 5, R. Kahler Martinson

habitat, in short, developing optimal habitat for native plants and wildlife.

Thank you for the opportunity of commenting on the draft Sheldon EIS.

Sincerely,

A handwritten signature in cursive script that reads "Rose Strickland". The signature is written in black ink and is positioned below the word "Sincerely,".

Rose Strickland



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

ARW

Project #D-SFW-K64004-NV

R. Kahler Martinson, Regional Director
Fish and Wildlife Service, Region 1
Lloyd 500 Building, Suite 1694
500 N.E. Multnomah Street
Portland, OR 97232

18 APR 1980

Dear Mr. Martinson:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled SHELDON NATIONAL WILDLIFE REFUGE RENEWABLE NATURAL RESOURCES MANAGEMENT PLAN.

The EPA's comments on the DEIS have been classified as Category LO-2. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal Actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

The EPA appreciates the opportunity to comment on this DEIS and requests three copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Susan Sakaki, EIS Coordinator, at (415)556-6925.

Sincerely yours,

Paul C. Kohmert Jr.
Paul De Falco, Jr.
Regional Administrator

Enclosure

Herbicide Comments

1. The DEIS states that vegetative manipulation will be accomplished through fire, chemical, and mechanical treatments. The discussion of chemical treatment is limited to the use of the herbicide 2,4-D. Adverse effects of 2,4-D on fish and wildlife, including endangered species, are not discussed. This area should be addressed in the Final Environmental Impact Statement (FEIS).
2. The DEIS does not discuss the impacts of 2,4-D on sensitive ecosystems in the area to be treated nor does it discuss the impacts of drift of this chemical on air, soil, and water in adjacent and surrounding areas. These subjects should be addressed in the FEIS.
3. The DEIS presents only minimal discussion of chemical vegetative manipulation. Alternative herbicides should be considered and a chemical management program should be developed with consideration given to relative environmental risks. The FEIS should address these issues.

EIS CATEGORY CODES

Environmental Impact of the Action

IO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Defenders OF WILDLIFE

Northwest Field Representative
P.O. Box 4491
Medford, Oregon 97501
April 18, 1980

To: U.S. Fish and Wildlife Service
Lloyd 500 Building, Suite 1692
500 N.E. Multnomah
Portland, Oregon 97232

Re: Draft Environmental Impact Statement
Sheldon National Wildlife Refuge
ARW-PRO

Dear Mr. Martinson,

I appreciate having the opportunity to review this EIS. The Fish and Wildlife Service is to be commended for soliciting public input, not only through the channels which are required by law, but for making a special effort to familiarize interested individuals with the refuges by conducting tours, such as the one I had the pleasure of taking through Hart Mt. and Sheldon National Wildlife Refuges in November, 1978.

My comments will begin with some general observations and impressions of the DEIS, followed by some page-specific remarks.

General Comments

After waiting for over a year for this document to appear, I must say that it was a real disappointment to find that the authors still seem to be proceeding upon three unsupported, and I believe erroneous assumptions:

- a) that FWS is a multiple use agency,
- b) that FWS is obligated to consider the economic impact of its refuge management policies on local communities, and individuals over wildlife values, and
- c) that cattle grazing, after having nearly destroyed the refuge, can now be intensively managed to "improve" the land for the wildlife.

My impression is that the decision to continue grazing came first, in the face of a significant amount of political pressure to do so, and that the "beneficial" uses of cattle were later used to justify this position. Unfortunately, the data does not support such a contention.

Even the economic arguments are shaky. To spend \$65,000 per year, plus the cost of hiring two additional staff people to monitor the grazing program is simply ridiculous. Table 111-22 shows that only three individuals have a high level of dependence upon the refuge, and of these three, one also has a substantial outside income, and another "moderate" outside income. If grazing were eliminated immediately for those whose livelihood does not depend upon refuge use, and phased out for the others, the economic impacts would be negligible, the costs to the public minimal, and the benefit to wildlife substantial.

The expenditures for fencing, cattle guards, etc., are all related directly to the use of the refuge by domestic animals. This is not consistent with refuge objectives - to maintain a diversity of wildlife species.

Fencing does not benefit wildlife. In fact, as acknowledged in the document, it is often detrimental. The only fencing which should be constructed is fencing along the boundary to exclude the cattle.

The proposed management plan does not provide an adequate assessment of the impact of continued grazing on nongame wildlife. In fact, nongame wildlife species are inadequately addressed throughout the document.

To allow grazing on two thirds of the refuge is excessive. Also, it is unclear exactly where such grazing will take place. In any arid region like Sheldon, the riparian zones, meadows, streams - anywhere water is found will provide habitat for the greatest number and diversity of natural plant and animal species. Unfortunately, cattle also find such areas disproportionately attractive, and concentrate near water, destroying these spots for wildlife. The final EIS should delineate more clearly where grazing will be allowed, in comparison to the potential wildlife values in each area.

I am specifically interested in the use of the Virgin Valley Ranch. Will cattle be allowed to graze there? What is the purpose of the proposed fence near the ranch? Will the existing fence be removed?

On our November, 1978 tour, we observed that the Virgin Valley Ranch was serving no purpose other than providing a place for private cattle, and that although it is one of the most productive areas on the refuge, Bruce Wiseman admitted that it was virtually useless to wildlife at that time.

The Virgin Valley Ranch should not be grazed or mowed, nor should it be considered in any proposed land transfers. Please address this specifically, as well as any other proposed land exchanges in the final EIS.

Rejection of the custodial maintenance alternative was based on idle speculation as to the probable effects which would result from removing the cattle entirely. The questionable conclusion was that it would benefit wildlife in the short run, but be detrimental in the long run as the vegetation got "wolfy" and "rank." I recall seeing several enclosures on the refuge, where cattle have not been allowed. Why were the results obtained through the monitoring of these sites not used in predicting long and short term vegetative response? If FWS is going to convince the growing number of people who are skeptical of the "cow as a management tool" theory, there should be some concrete examples of that "wolfy" vegetation which is in need of bovine cropping to restore its vigor.

Occasional references in the DEIS to predator management and control are disturbing, as they seem to imply that refuge personnel have some inherent prejudice against predators. A discussion of the role of predators in maintaining healthy diversity of wildlife species at Sheldon needs to be included in the final EIS, and the biased remarks deleted.

None of the alternatives presented are entirely acceptable. In fact, they are arranged in such a manner which makes all of them except the FWS preferred alternative seem impossible.

The custodial maintenance option is the most attractive. A modified version of this option would provide the most wildlife benefits. The plan should have the following components:

- 1) Phase out all existing livestock grazing permits at Sheldon, by cancelling first the privileges of those whose economic dependence is the least, i.e., the corporate owner, followed by those families whose outside income is the greatest.
- 2) All grazing should be terminated by 1985, except where a need is demonstrated and cattle grazing is the most effective method available for removing or thinning the vegetation.
- 3) Other appropriate vegetation management techniques, where necessary to benefit wildlife are burning and hand cutting - not herbicides or mechanical removal.
- 4) No internal fencing, cattle guards, etc. which do not benefit wildlife directly should be constructed.
- 5) Cattle, where used, should be controlled by herders, and allowed to remain only as long as necessary to accomplish the desired objectives.

Defenders, page four

- 6) All streams, ponds, meadows, springs, should be protected from livestock.
- 7) Predator control is unacceptable on a refuge, unless, perhaps, an endangered species needs temporary protection.

Page-Specific Comments

Cover Sheet

The second paragraph of the abstract clearly exemplifies the inconsistencies which follow throughout the document. The stated purpose of the intensively managed grazing program on the refuge is to "manipulate the vegetation to enhance its value to wildlife." The projects however, (construction of gates, interior fence, etc.) are designed to accomodate domestic livestock, not wildlife, except to the degree that they serve to exclude cattle from certain areas and concentrate the damage.

I. 1

Admittedly, the lack of vegetative diversity and low plant vigor are the result of overgrazing by cattle, thereby reducing the availability of food and cover for wildlife. Overgrazing has contributed to the destruction of riparian vegetation and water quality in six different ways. This candid assessment of the livestock damage on Sheldon NWR is appreciated, as it accurately describes the condition of most of the refuge at the present time.

I. 3 Wildlife Needs

It is interesting that the abstract states that "The primary purpose of this plan is to provide habitat for a diversity of native plant and animal species," (underlining added) but FWS has insufficient data to set population objectives for more than four species - all game species at that. In view of the fact that a paper entitled "Abundance of Nongame Birds and Small Mammals by Ecosites," (Sheldon NWR, NV Spring and Summer 1978) was recently prepared, it is not clear why the data collected, although scanty, was not used to incorporate the needs of nongame species into the plan.

I. 3. 1 Wildlife Population Objective Levels

It is discouraging to see a FWS plan which fails to use a more sophisticated ecological approach to habitat management. Setting "population" objectives for certain game mammals implies that such species are given preferential treatment, which is inconsistent with the stated objective of the plan. The reference to "predation" on antelope kids reinforces the suspicion that "production" of game mammals is the objective (after accomodating ranchers) rather than maintaining diversity as claimed. Predation is a natural function in any ecosystem, and should be recognized as such in the plan.

II. 1

The preferred alternative, which proposes to use "controlled cattle grazing as the primary means of managing the vegetation," is unacceptable, in view of the fact that cattle grazing has been the direct cause of the damage to the refuge which is clearly described on the previous pages. The proposed fencing will merely distribute the livestock damage. Rehabilitation can be expected on the 197,000 acres which are protected from cattle use.

II. 1. 2 Level of Livestock Utilization

The level of the livestock should be reduced, not simply redirected and monitored.

II. 1. 3 Range Monitoring

The criteria for determining the "appropriate" level and distribution of cattle seem to indicate that site specific evaluations will be made on an annual basis. What percent of the refuge personnel time will be spent on such activities?

The construction projects, again, are designed not to accomodate wildlife, but to protect wildlife, at least to some extent, from the cattle. It has not been demonstrated to my satisfaction that internal fencing benefits wildlife in any way. Fences provide an artificial barrier which interferes with the migration of large mammals.

II. 1. 6

The preferred alternative is completely unacceptable in terms of costs and benefits to the public. \$257,000 plus the additional costs of hiring a range conservationist and biotechnician as a direct subsidy to ten permittees cannot be justified.

II. 1. 7

The use of fire is an acceptable technique to manage vegetation, However, 2,4-D applications are inappropriate for the following reasons:

- a) On April 20, 1978, EPA published a notice in the Federal Register that 2,4-D had been accepted as a candidate for extensive pre-RPAR review because tests indicated that risk criteria was exceeded for birth defects, cancer, and effects on non-target organisms. As this matter has yet to be resolved, it would seem prudent to defer the use of this chemical until it can be shown to be harmless to people and wildlife.

- b) Insufficient information is available on the ecological impacts on wildlife generally to justify applications of this chemical on a wildlife refuge.
- c) The management plan does not specify what substance will be used as a carrier for the herbicide. Diesel oil is commonly used in forest applications, but is entirely inappropriate on a refuge because, a direct hit would be detrimental to any birds or animals affected, as it mats feathers, fur, reduces the hatchability of eggs, and is toxic if ingested.
- d) Application of any material by aircraft is also inappropriate on a wildlife refuge, as many wildlife species, particularly big game species, are stressed by the noise and harassment associated with helicopters and fixed-wing aircraft.

II. 1. 8 Evaluation

1. It has not been demonstrated in this document that grazing will increase the vegetative vigor and diversity. The evidence points to the contrary. It is unacceptable to base a management plan upon expectations and estimates of assumed benefits. It must be based on reliable scientific data.
2. The benefits to wildlife would be increased more if all not most, of the water sources were excluded from grazing.
3. The negative impacts on wildlife which will result from the construction of internal fence, cattle guards, etc., have not been addressed.
4. \$69,000 per year could be more appropriately spent on exterior fencing to exclude the cattle from the refuge, replanting damaged riparian vegetation, and by conducting ecological studies to document the improvement to the habitat which is excluded from grazing, rather than on "controlling" cattle on two thirds of the refuge.
5. Minimizing the adverse impacts of grazing reductions on the pocketbooks of permittees seems to have received a higher priority than protecting and enhancing wildlife habitat.

II. 2.1

It is stated here that removing grazing wild horses and burros would increase the vegetative response and diversity. However, the proposed alternative is to use cattle to graze the refuge for the purpose of enhancing plant vigor and diversity. Please explain how burros and horses are detrimental while cattle are beneficial to the vegetation.

Defenders, page seven

II. 3. Custodial Maintenance

This option, which would phase out all grazing by 1985, and rely on natural processes to rehabilitate the habitat at Sheldon, is the alternative which is the most acceptable, least costly, and most likely to accomplish refuge objectives.

II. 3. 1 Evaluation

Where is the data to show that the nutritional quality of unmanaged vegetation is inferior to "managed vegetation?"

How is non-management of habitat detrimental to antelope and deer? Why are only game species considered?

A management plan must not be based on "speculation," but on the best available data, which, by the admission of the authors of this document, shows that the refuge has been seriously damaged by cattle grazing. What evidence is there to support the assumption that habitat vigor and diversity would decline in ten years if not grazed by cattle? What does the vegetation in the enclosures look like?

Severe adverse economic impacts on three permittees, and lesser impacts on a few others is not a sufficient justification for the expenditure of \$69,000 per year for five years, especially when one considers the additional "costs" to the wildlife which will result from continued degradation caused by livestock and the paraphernalia necessary to control them.

II. 4.

The practices of chaining and roto-beating are questionable even for BLM lands which are managed for multiple use with an emphasis on cattle production. If this practice is being seriously considered for a refuge, it would be helpful to have more information. For example, what will be planted in the place of the vegetation which is being destroyed? Crested wheatgrass?

II. 5.

The "no action alternative" is unacceptable, as it would simply maintain the status quo.

III. 6.8. Meadows

In view of the fact that the 444 acres of meadows on Sheldon are the most productive areas for wildlife, and have also been seriously degraded by the cattle, they should be excluded from grazing until it has been demonstrated that the meadows are overgrown and in need of some vegetative manipulation.

Defenders, page eight

III.6.10.

Aspen groves are critical for nesting and perching birds. Since trees of any kind are uncommon on Sheldon, it is important that the groves are protected from cattle damage. Cattle trample the young shoots as they are coming up, thereby preventing new trees from replacing the mature ones.

III. 6.11.

Riparian areas at Sheldon are sadly degraded, and should also be protected from cattle, as they are critical to a variety of wildlife species.

III.7.8.

What is meant by "predator management?" How does such an activity differ from "predator control?" If the objective of the management plan at Sheldon is to encourage a diversity of species, how can "predator management" be justified?

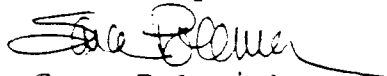
Conclusion

When the final EIS on Sheldon NWR is prepared, perhaps the services of a professional, unbiased, wildlife biologist should be solicited. In this, and other similar cases, it seems likely that the refuge personnel, who live in the small communities dominated by the local ranchers, are subjected to intense political and social pressures exerted by the cattle industry. It is almost impossible for them to escape the tendency to reflect the values held by the majority of people with whom they must live and work.

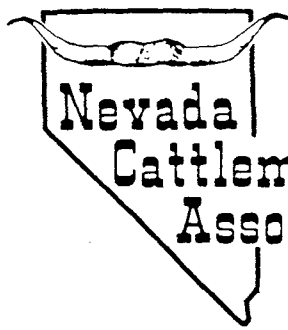
However, Sheldon is a National Wildlife Refuge. It is not a private cattle ranch, and it is not BLM land which is managed for multiple use. The land should be protected by FWS for the wildlife, for all Americans, and for future generations.

Again, thank you for the opportunity to comment on this draft EIS. I am anxiously awaiting a copy of the final document, and I trust that I'll also receive copies of any other proposals which are available for review. I'm particularly interested in seeing what you have in mind in the way of "predator management."

Sincerely,



Sara Polenick
NW Field Rep
Defenders of Wildlife



Nevada
Cattlemen's
Association

975 Fifth Street - Elko, Nevada 89801
(702) 738-6846

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Robert R. Wright
Clover Valley, Wells

April 21, 1980

U.S. Fish & Wildlife Service, Region I
Lloyd 500 Building, Suite 1552
500 N.E. Multnomah St.
Portland, OR 97232

Attention: Jeff Thomas

Dear Sirs:

The following comments are provided on the Draft Environmental Impact Statements on Sheldon National Wildlife Refuge.

We question the reasoning behind the elimination of cattle grazing within bighorn sheep habitat areas. We are not aware of any data from studies that show a significant overlap of habitat or diet. We would appreciate any copies of such studies you have made this determination by.

Proposed grazing cuts should only be made if substantial data exists to show that there is a major conflict. The additional benefits to the public from such grazing cuts should be explained as well as the negative economic and social effects caused by reduction or elimination of livestock numbers.

Thank you for this chance to comment on this draft statement.

Sincerely,

Paul Bottari
Executive Secretary

PE/lS

PRO

- _____ Graves
- _____ Burkholder
- _____ Donovan
- _____ ✓ Lee
- _____ Manning
- _____ Mosley
- _____ Peterson
- _____ ✓ Rogers
- _____ *Jeff Thomas*



NATIONAL CATTLEMEN'S ASSOCIATION
Affiliate Member



IN REPLY REFER TO:

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102
450 Golden Gate Avenue Box 36062

PSW 200

APR 18 1980

MEMORANDUM

To: Regional Director, Fish & Wildlife Service, Portland, Oregon
From: Regional Director
Subject: Review of Draft Environmental Statement for the Sheldon National Wildlife Refuge Renewable Resources Management Plan (ARW-PRO)

We have reviewed the subject document and offer the following comments.

Cultural Resources

Discussion of cultural resources is generally adequate. However, no commitment, to submit for nomination the National Register of Historic Places eligible sites identified on page III-19, is documented in the draft statement. Section IV: 1.7 should include a commitment to nominate the sites recorded.

Recreational Resources

No discussion of the environmental consequences of the proposed actions on recreational resources is included in Section IV of the document. Potential reduction in hunting activity could be significant. The discussion of existing recreational activities on page III-24 should be expanded to include estimated use levels. The projected impact of each proposed alternative, on existing recreational resources should also be quantified for inclusion in Section IV.

PRO

Graves

holder

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CT.



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

X ARW
copy sent
4/10

Memorandum

APR 8 1980

To: Regional Director, Fish and Wildlife Service
Portland, Oregon

Through: Assistant Secretary--Energy and Minerals

H. A. Smith

APR 10 1980

From: Director, Geological Survey

Subject: Review of draft environmental statement for management
plan, Sheldon National Wildlife Refuge, Nevada and Oregon

We have reviewed the draft statement as requested in your letter of February 26.

Because the preferred alternative includes use of carefully managed livestock grazing (p. II-9, IV-2) in an area where water is relatively scarce and some declines in the water table have been noted (p. I-2, III-3), the environmental statement should assess effects on ground-water resources of the use of livestock grazing as a management tool.

Ordinarily in an arid and semi-arid climate transpiration by many types of vegetation will tend to lower the water table. The draft statement, however, attributes declines in ground-water levels, that is, in the water table, to destruction of vegetation (p. I-2). This seeming paradox should be explained.

The text refers to source materials on the geology of the refuge area (p. III-1), but the references are not included in the list in appendix A.

George H. Wauson
for H. William Menard

ARW

EARL D. SANDVIG
10719 N. E. PRESCOTT ST.
PORTLAND, OREGON 97220

April 18, 1980

R. Kahler Martinson
Regional Director
U.S Fish & Wildlife Service
500 N.E. Multnomah St.,
Portland, OR 97232

Ref: ARW - PRO

PRO

Graves

Durkholde

Longvan

[unclear]

[unclear]

[unclear]

Peterson

Rogers

[unclear]

Dear Kahler;

I was very pleased to receive a copy of the Draft EIS for the Sheldon Refuge Management Plan. For several years, I have been interested in observing some of the management actions taking place there.

To sum up my observations of the Sheldon, I have to say, "the land and its vegetation is very tired looking." The EIS strongly supports my observation. Large acreages are dominated by such invader shrubs as big sagebrush and rabbit-brush. "Plant communities exhibit uniformly low vegetative "health" or vigor over Sheldon"

On page 1-2 domestic livestock are named as causing six kinds of damage to Sheldon, but I am disturbed to read that the authors of the EIS are still not sure that the grazing of domestic livestock is ~~the~~ responsible for wildlife habitat problems on the Refuge, for they use the doubtful phrase "are believed" to have resulted from historic overgrazing. Isn't there enough data now to state unequivocally that grazing domestic livestock in the Refuge is responsible for the wildlife problems and in some instances has caused almost, if not, irreparable damage to the land?

When the National Audubon Society and the Boone & Crockett Club contributed \$35,000 to buy the Last Chance Ranch, obviously the memberships of those Clubs did so for the sole purpose of providing habitat for wildlife as specified in the Executive Order of 1931. However, in managing the property purchased this Order was violated, probably because of pressures from local ranchers to continue livestock grazing in the Refuge. Then by Executive Order in 1936 the original Refuge was enlarged by over a half million acres. The declarations in the 1936 Order allows continuation of livestock grazing if it can be demonstrated or proved that all of the natural forage resources are not necessary "for the purpose of sustaining in a healthy condition a maximum of three thousand five hundred (3,500) antelope, the primary species, and such nonpredatory secondary species in such numbers as maybe necessary to maintain a balanced wildlife population". The EIS attempts to show

there is a surplus of forage not needed by wildlife and that livestock are necessary to improve the vegetation for wildlife.

The Preferred Alternative of the EIS finds that there is a surplus of forage above that needed for wildlife and recommends the allocation of 15,221 AUMs to livestock in the first year under the proposed management plan. In the 5th year of the Plan livestock use is increased to 17,608 AUMs. It is claimed that this increase in AUMs for livestock is to be accomplished by manipulation and control of the livestock. There is no solid proof offered to support this claim.

Years ago Range Researcher Ellison carried out experiments to measure the effects of grazing on land and vegetation at the Great Basin Station in the Wasatch Mts. of Utah. He found no beneficial effects from livestock grazing there. However, if it has been determined through careful research that some plant species benefit from grazing and increase the value of the habitat for wildlife, the methods of manipulating and controlling livestock to achieve the results desired become so burdensome and expensive that they become prohibitive and impractical. Measured in quantity (AUMs) what would the total amount to on Sheldon?

The EIS is truthful in describing some of the limitations on using livestock as a management tool in improving vegetation. Quote, "Grazing as a vegetative management tool suffers from a number of major limitations. ... A second major disadvantage of this alternative is the high cost of implementing a controlled grazing program. Capital expenditures in the form of fences, pit reservoirs, ponds etc. would be required to control movement of cattle."

Costs for installing range developments are estimated at \$257,000 or \$25,700 for each of 10 cattle permittees. Annual maintenance costs are \$6,900 per permittee. In addition to these high costs to provide 10 cattlemen with forage, there is the cost of monitoring the effectiveness (doubtful as it is) of using cattle to improve the forage resource for wildlife.

The EIS claims that by "allowing cattle to selectively graze specific vegetative communities, nutritional quality of the vegetation can be enhanced for wildlife. For example, cattle can be used to hedge rank stands of bitterbrush to produce new, tender leaf growth." In response to this claim it is a fact that antelope bitterbrush is a primary species for both cattle and big game. On critical winter range for game it is usually so heavily hedged and overused there is a great need to protect it from grazing animals to prevent it from being killed. This grazing treatment doesn't seem to have much to support its use on Sheldon or elsewhere.

The Preferred Alternative strongly supports livestock grazing as a topmost feature of the management plan for the Refuge. There are, of course, some reasons to incorporate livestock grazing in the Plan. The Refuge was grazed by livestock many decades before it was established; it is situated in an area chiefly devoted to raising livestock; ~~pressures~~^{pressures} exerted by grazing permittees and others to continue livestock grazing; what appears to be a verbal commitment to Senator Moss by the F&WL Service to continue to honor existing grazing permits (how long is the public owners of the Refuge going to be held to this unfortunate promise?); and the 1936 Executive Order recognized grazing as a secondary use of the Refuge. The decision to graze livestock as proposed in the Plan should not be made upon the reasons stated above or those contained in the EIS, but upon the conditions found in the Refuge and positively identified as most beneficial and necessary for the protection and enhancement of the wildlife populations.

For the period 1936 - 1976 or 40 years, the forage resource was the responsibility of the BLM and wildlife of the Fish & Wildlife Service. These Federal Bureaus have traditionally two different functions. The BLM emphasizes commercial uses such as grazing, mining and other resources which produce an economic return. In contrast, the Fish & Wildlife Service's primary responsibility both by law and in fact is to provide protection for wildlife habitat on the lands under its jurisdiction. During the 40 years of divided responsibility the resources of the Refuge were not satisfactorily managed. In 1974, I wrote a letter to the Regional Director of the F&WL Service for information on the grazing system in use. He replied

"The season of use is from mid-April to October, with exception of two year-round ranch operations.

Although the various users have individual allotments, no grazing systems have been initiated to date.

Wildlife population is essentially static except California bighorns which are increasing."

Most if not all of the unsatisfactory management of the Sheldon can most logically be charged to the domination of livestock interests and the willingness of the Bureaus to conform to the pressures they receive from that group. An example of the willingness of the Bureau to conform is the expressed Plan in the EIS to permanently establish eight (8) cow pastures in the Refuge.

To provide necessary protection for wildlife and wildlife habitat and to manage Sheldon as a wildlife Refuge free of the problems brought on by livestock; these actions should be taken within a specified number of years - preferably 10 years.

I

Elimination of all livestock grazing.

The record shows three operators to have only minimal need for forage from Sheldon. Their permits could be discontinued on short notice, such as the end of the season.

Four permittees have moderate need for grazing from Sheldon. They should be allowed a reasonable time, to make the changes needed. Three years should be adequate.

There remains three permittees which were judged to have a vital need for range in the Refuge. FWS policy will not allow a grazing permit to be transferred with the sale of land, therefore, eventually complete elimination of livestock grazing seems certain to take place. However, increases in grazing use should not be permitted to these operators and such reductions should be made in their permits as required to eliminate conflicts with wildlife and for safe protection of the habitat.

II

Purchase of 4,764 acres of privately owned land in the Refuge.

The presence of this land brings problems which ought to be terminated. The EIS doesn't describe this land, but it is understood that ranches which have been purchased for the Refuge are leased to ranchers. This practice ought to be stopped as some of the best wildlife habitat is contained in these lands.

III

Stop building interior fences for the purpose maneuvering livestock movements.

Where necessary to prevent trespass by livestock fences should be built on the boundary of the REFUGE.

IV

Eventually eliminate all wild horses and burros.

These animals cannot be classified as native wildlife. They can and do serious damage to wildlife habitat.

V

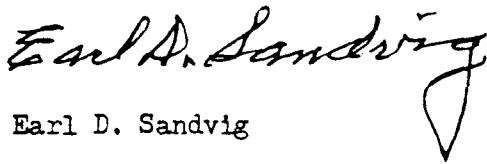
Exclosures. Twelve are shown on the map. At least twice as many should be built.

Exclosures are very valuable, ^{For} exhibiting changes in vegetation, healing of gullies, and many other features. They serve as "benchmarks". In 1978 we were shown one in the Badger Mtn. area. Periodic analyses of change in the vegetation, soil etc, provides firm basic data for management.

I am convinced that improvement in conditions has taken place on the Sheldon since the division of responsibility between the BLM and the F&WL Service ended in 1976. However, the Preferred Alternative for Sheldon exhibits the former attitude of favoring livestock grazing over wildlife needs for the future management of the Refuge.

The value of perpetuating large areas of scenic mountainous beauty, and providing opportunities for people to enjoy wildlife in natural surroundings unimpeded by a utilitarian activity cannot be measured in money. The satisfaction of knowing that the many species of native wildlife can be provided unencumbered habitat on Sheldon by eliminating competing ^{exotic} species is priceless. This is the trust the people have placed in the hands of the Fish & Wildlife Service.

Sincerely,

A handwritten signature in cursive script that reads "Earl D. Sandvig". The signature is written in dark ink and has a distinctive, elongated tail on the final letter.

Earl D. Sandvig



United States Department of the Interior

BUREAU OF MINES

EAST 315 MONTGOMERY AVENUE
SPOKANE, WASHINGTON 99207

April 17, 1980

Memorandum

To: R. Kahler Martinson, Regional Director, Fish and Wildlife Service, Portland, Oregon

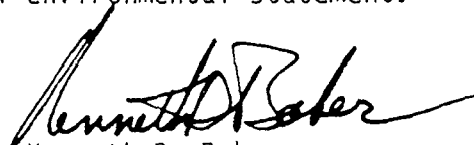
From: Acting Chief, Western Field Operations Center

Subject: Review of Draft Environmental Impact Statement (DEIS), Sheldon National Wildlife Refuge, Renewable Natural Resources Management Plan, Washoe and Humboldt Counties, Nevada, and Lake County, Oregon

The DEIS contains no minerals information other than the short sentence on page III-24 and a very general depiction of areas with mineral potential on map III-14. We suggest the following paragraph be inserted on page III-24.

"A minerals survey of the Sheldon was conducted in 1974 and 1975 by the U.S. Bureau of Mines and the U.S. Geological Survey. The Geological Survey made general mineral resource evaluations by geological, geochemical, and geophysical studies; the Bureau of Mines examined mines, prospects, and other mineralized localities to determine mineral resource potential. The investigation identified several areas of minerals significance. The Virgin Valley area contains reserves of precious opal, small quantities of decorative building stone, and low grade uranium resources. The investigation indicates that there are several areas having potential for the discovery (at depth) of mercury and of base and complex precious metal sulphide deposits. Reservoir temperatures estimated from the analyses of thermal springs suggest the area has low to moderate potential for geothermal resources."

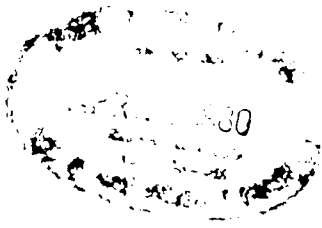
Please consider these comments as technical assistance. We would appreciate the opportunity to review the final environmental statement.


Kenneth D. Baber



**ANIMAL
PROTECTION
INSTITUTE
OF AMERICA**

5894 South Land Park Drive
P. O. Box 22505
Sacramento, CA 95822
(916) 422-1921



Copies to	Points to	Area	Date
	✓		
	✓		
	✓		

Gmk
Bw

Refuge Manager
Sheldon National Wildlife Refuge
U.S. Fish and Wildlife Service
Room 308
Post Office Building
Lakeview, OR 97630

Dear Sir:

I am writing you concerning the draft EIS on the proposed management plan for the Sheldon National Wildlife Refuge.

I support your efforts to eliminate livestock grazing and to increase wildlife diversity, but would recommend that livestock grazing be eliminated in all areas in the refuge rather than in just some.

I object, however, to your plan to reduce wild horses from 800 to 75-125. This severe reduction is discriminatory. These animals should be regarded as an integral part of the ecosystem. I feel that 800 is not a very large number compared with other herbivore species such as deer using the area. Besides this, wild horses are not livestock. They are not placed out only at certain times of the year as are livestock. Rather, they must live year-round and establish a balance with their environment. For this reason, they are wildlife.

I think you are placing the wild horse in the bottom-most rung of your priorities below what you call wildlife, both game and non-game, and below livestock. I feel that this is unfair in light of the fact that this species is legally a public heritage species and one which has a right to be considered along with the other species which inhabit our wild lands. The Wild Horse and Burro Protection Act of 1971, PL 92-195, is the legal basis for this.

I would be interested in receiving any data you have for the refuge regarding relative AUM's, or grazing use, for the various herbivore species as well as another copy of the EIS.

To repeat, I favor elimination of domestic livestock grazing--which should have no place in a wildlife refuge--and the retention of the entire wild horse population. continued.....

MEMBER
WORLD FEDERATION
FOR THE
PROTECTION OF ANIMALS
ZURICH, SWITZERLAND

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California

Vice-Chairman
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Veterinary Medicine

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Speakers Bureau

BRUCE MAX FELDMANN, D.V.M.
Veterinary Medicine & Pet Population

MARJORIE GUERRERO
Humane Education

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Northwest Regional Activities

ED KING
Investigations & Law Enforcement

MARJORIE KING
Publicity & Promotions

MRS. EARL E. REED
Idaho Regional Activities

ANN VOLIVA
Promotions & Auxiliaries

MRS. RALPH YOUNGDALE
Publicity & Promotions

Foreign Advisors:
ANGUS O. McLAREN
Transvaal, South Africa

MRS. ANNA MUMFORD
Vancouver, Canada

MICHAELA DENIS
Nairobi, Kenya

In Memoriam:
VELMA "Wild Horse Annie" JOHNSTON
Nevada

HARRY DEARINGER
Wyoming

April 14, 1980

lation in the refuge.

I would like to know what other exotic species there are in the refuge, such as chukkar or pheasant, and how they are being treated relative to the wild horse.

I would also like to inform you that the wild horse is a natural denizen of the North American ecosystem inasmuch as he evolved here and has only been absent a relatively few thousands of years.

Please pass on this letter to whoever is responsible for receiving comments on the EIS.

Looking forward to your reply, I am,

Sincerely yours,

Craig C. Downer
Research Services

CCD/bs



MEMO

TO Roland Westergard
 FROM Jay Meierdierck *JM*
 SUBJECT SHELDON GAME REFUGE MANAGEMENT PLAN,
 8030051

DATE March 14, 1980

**DIVISION
 OF
 STATE
 PARKS**

The Division of State Parks supports the proposed action as reflecting the best management of the Refuge. The proposed action is compatible and supportive of the States Comprehensive Outdoor Recreation Plan. We would like to make these additional comments, to be included in the final management plan. None of these proposals would be counter to the proposed action or counter to the special purposes of the National Wildlife Refuge System as presented on page I-1.

1. The existing "primitive campsites" as presented on map III-13 be continued to provide overnight sites for hunting, fishing, nature study, sightseeing, hiking, rockhounding, wildlife observation and other possible dispersed recreational activities.
2. The corridor for the Desert National Scenic Trail through the Refuge should be protected. The Desert NST is currently pending before Congress. It is also an integral part of the Nevada State Wide Trail System, being the principal Cross-State Trail for foot and equestrian use. We and the neighboring states are working to protect the corridor with each land management agency to make the Desert NST a reality from the Canadian border to the Mexican border. The exact route through the Refuge is uncertain at this time but the Trail would enter the Refuge from the southwest in the vicinity of Massacre Lake. It would exit the Refuge at its eastern boundary possibly through Thousand Creek Gorge or other routing to cross the state border at Denio. We would like to work with the Refuge to establish a trail corridor that would be compatible with the reestablishment of bighorn sheep and wildlife oriented public recreation.
3. Located within the Refuge are three proposed Natural Heritage Heritage sites, The proposed Refuge management plan would not adversely affect these sites, but additional protective management may be appropriate. The three sites are:
 - a. Dawn Redwood Fossil Sites (in Virgin Valley T45N, R26E). This site is of particular geological interest, consisting of about 50 large petrified stumps. There are also reports on Virgin Valley as a site for fossil mammals.
 - b. Hell and Virgin Creeks (T43,33N; R24½,25E). This area is significant for its basalt mesas and deep, narrow canyons, and riparian community ecology.

RECEIVED
 MAR 18 1980

**Department of Conservation
 and Natural Resources**



STATE OF NEVADA
GOVERNOR'S OFFICE OF PLANNING COORDINATION
CARRINGTON BUILDING
CARSON CITY, NEVADA 89710
1-800-752-4387

April 8, 1980

Mr. Jeff Thomas
U.S. Fish and Wildlife Service
Region 1 (ARW-PRO)
Lloyd 500 Bldg., Suite 1552
500 N.E. Multnomah St.
Portland, Oregon 97232

RE: SAI NV# 80300051 Project: Sheldon Game Refuge-RNR Mgt. Plan

Dear Mr. Thomas:

Attached are the comments from the following affected State Agencies: Division of Water Resources, Division of State Parks, Division of Water Planning, Division of Forestry, and the Department of Wildlife concerning the above referenced project.

These comments constitute the State Clearinghouse review of this proposal. Please address these comments in the final or summary report.

Sincerely,

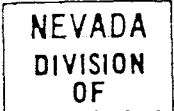
A handwritten signature in cursive script, appearing to read "Mike Nolan".

Mike Nolan for
Robert M. Hill
State Planning Coordinator

RMH:md
Enclosures

- c. Thousand Creek Gorge (T46N, R26E). Thousand Creek Gorge is a canyon 3.5 miles long with 200'-600' walls cut through Tertiary volcanic flows with a superb gooseneck meander and illustrates several geomorphic processes.
4. Highways 140 and 34A through the Refuge have been proposed as Scenic Highways.

JM:ew



WATER PLANNING

MEMORANDUM

JAMES P. HAWKE
ADMINISTRATOR

March 26, 1980

TO: State Clearinghouse

FROM: James P. Hawke, Administrator *JPH*

SUBJECT: SAI NV# 80300051 - Sheldon Game Refuge Management Plan

The above referenced plan has been reviewed and is found to be consistent with the State Water Plan. The proposal is supported as written.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY (WATER RESOURCES)

- No comment on this project
- Proposal supported as written (see below)
- Additional information (see below)
- Conference desired (see below)
- Conditional support (outlined below)
- Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

Management plan should include provisions for compliance with Chapters 533 and 534 of the Nevada Revised Statutes in appropriation of the public water.





ROBERT L. SMITH
GOVERNOR

JOSEPH C. GREENLEY
DIRECTOR

1100 VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89520

TELEPHONE (702) 784-6214

April 4, 1980

Mr. Mike Nolan
Office of the State Planning Coordinator
Heroes Memorial Building
108 West Second Street
2nd Floor
Carson City, NV 89710

Dear Mike:

The Nevada Department of Wildlife appreciates the opportunity to review and provide comments to the Sheldon National Wildlife Refuge Renewable Natural Resources Management Plan, Draft EIS.

SAI NV# 80300051

Our comments are as follows:

1. The Department supports the Fish and Wildlife Service preferred alternative (CRMP) with the following stipulations.
 - a. If the monitoring system proves the CRMP is not meeting soil, vegetative, water and wildlife objectives within two grazing cycles, then prescribed grazing only or custodial maintenance should be pursued.

Sincerely,

Joseph C. Greenley
Director



ARU



SOCIETY FOR THE CONSERVATION OF
 WILDLIFE HABITAT
 2520 SAINT FRANCIS DRIVE
 SACRAMENTO, CALIFORNIA 95821

4/6/80

Dear Sir,

I am writing you strongly supporting your proposed management plan for the Sheldon National Wildlife Refuge. We have been keenly aware of habitat problems in the area by livestock overgrazing for quite a while. There is no question this is a real movement for proper stewardship of a truly unique and valuable area to wildlife. Antelope, deer, big horns and many other forms of wildlife will greatly benefit from this progressive far sighted move. Also, livestock operators will benefit in the long run. Again, we tremendously support your proposal, thank you!

Sincerely,
 Dana M. Ginn

U.S. Fish and Wildlife Service Region I
Lloyd 500 Bldg., Suite 1552
500 N.E. Multnoma St.
Portland, Oregon 97232

Subject: Sheldon Environmental Impact Statement

The U.S. Fish and Wildlife Service is to be commended for developing a document of clarity and brevity. The Sheldon plan has been widely discussed and an aura of hope is riding on its successful implementation. To have a plan which purports to improve the range, increase game species, preserves wild horses, and provides for a diversity of wildlife without apparently seriously disrupting livestock permittees, is more than we could have hoped for let alone expected. Credit should be given to the careful planning, obvious interest and goodwill of refuge staff who have put so much time into the plan and into making themselves available to interest groups.

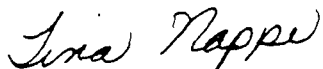
The success of the plan rests on the continued cooperation between all groups, the continuous monitoring and evaluation of the transects and staff continuity and concern for wildlife. Sheldon is one of the few places in Nevada where land can be managed for wildlife. Research conducted on the Sheldon will have importance for wildlife on other Nevada lands and future wildlife policies. As I understand your procedures, you are awaiting completion of studies on nongame wildlife before designing specific programs for critical species. However, you will report to workshop participants and other interested people at yearly meetings on your progress and proposals for nongame species.

One area where research and issue clarification is needed is in regard to predators. Under the current introductory statement on antelope and mule deer, pages I-3 and I-4 some might conclude that the degree of predation on the Sheldon compared to predation in other areas is excessive and that reducing coyotes might result 1) an overall antelope population increase, or 2) an increase in the huntable population. The first case suggests that the habitat as is can support more antelope and the only limiting factor is coyote predation. The second suggests that the habitat cannot support more antelope but that sportsmen rather than coyotes or other causes (which you don't discuss and should) will remove the increase spared by the coyotes. Because of your statements in the EIS, you may be under pressure to use predator control. However, your information is not sufficient at this point to pursue this alternative without having exhausted other possibilities. Because of the value predation research will have on policies in other areas of the state, I hope you will continue to direct funds into this issue.

There currently exists some controversy over fencing practices. Some ranchers claim that fences do not sufficiently control livestock movement and some wildlife interests feel that antelope will consider the fences a barrier, particularly newly constructed fences.

It somewhat surprises me that you can get away with circumventing the EIS process by proposing only one plan which you are already in the process of implementing.

Sincerely,



Tina Nappe

MS 525
2310 Broadway
Reno, NV. 89503