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- *Environmental Consequences of the Proposed Action*

No known cultural resources are being damaged by grazing within these allotments. A decrease in the number of animals grazing within an allotment decreases the possibility that unidentified cultural resources could be affected.

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- *Environmental Consequences of No Action Alternative*

Under the No Action Alternative, it is expected that indirect impacts to cultural resources would continue at the same level as in the past. Currently, no known cultural resources are being affected by grazing within these allotments. When projects or rangeland improvements are proposed, grazing patterns within allotments are evaluated and compared with locations of known cultural resources. Future proposed rangeland projects would be surveyed and evaluated for cultural resources before they are implemented. Cultural resources are long-known to be more frequent near water sources.

The Proposed Decision is to modify allotment boundaries and changes to patterns of use within the proposal area and as such, qualifies as a proposed management action for the purposes of rangeland improvement. While BLM stipulates the commitment in future proposals to survey and evaluate cultural resources compared to grazing patterns within the allotments, no information was presented within the RHA that asserts cultural resource survey's and evaluations were conducted in connection with the proposed changes.

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The vegetation in the Montezuma, Razorback and Springdale 2 Allotments provide very little forage for wild horses. Some forage is available for cattle. This forage is found mainly in the valley in the northern portion of the Montezuma Allotment and in pasture 5 in southern Montezuma Allotment. The Goldfield, Montezuma, Stonewall and Bullfrog HMAs provide forage for burros but little forage for horses and cattle.

Find where this info is available and how they make the distinction between the areas.

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During the 1990s, large numbers of horses and burros resided in the Montezuma and Razorback Allotments. These numbers greatly exceeded the AML set in the RMP for both horses and burros. Large numbers of these wild horses and burros left the HMAs in order to find forage. Most of the horses resided outside the Montezuma Peak HMA in the north portion of pasture 1. Large numbers of burros left the east half of the Bullfrog HMA and moved into the north portion of pasture 5. Both of these areas received heavy use by wild equids until they were gathered. This excessive use reduced the amount of forage now available. Burros were removed from pasture 5 in 1996 while horses remained in pasture 1 until 2006. Pasture 1 would initially need a partial rest from livestock rest until it recovers. Pasture 5 has had 11 years of rest from burros and livestock use.

Cross reference with BLMs assertions that all wild horses were removed in 1996.

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Damage to riparian areas was caused mainly by the excessive numbers of wild horses and burros. The removal of large numbers of wild equids throughout the Complex in 1996 had provided 11 years of rest for these riparian areas. Since 1996, most of the riparian areas have improved. This improvement would continue under the conservative stocking rates proposed for both livestock and wild equids.

Cross reference to TNR grazing being issued since 1997, the year after wild equids were removed.

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Under the No Action Alternative

The indirect impacts of the No Action Alternative would be that non-attainment of the Tonopah RMP objectives, Standards for Rangeland Health and multiple use objectives would continue. As the numbers of horses within the HMAs reach the current AML, they would leave the HMAs and move into and graze on the important forage species found on the more productive soils. Refer to Appendix A for a more detailed discussion.

BLM states that as the number of wild horses reach the *current* AML, they would leave the HMAs and move into and graze on the important forage species found on the more productive soils.

Isn't that a clear indication that the established wild horse AMLS are properly based on rangeland carrying capacity since BLM clearly asserts that wild horses would not have need to leave the HMA until the current AML is reached?

Also, BLM asserts that wild horses are not allowed on the more productive soils and to access important forage species. While higher quality habitat is located in the area, it is not made available for wild equid use.

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Table 24.0 Past Authorized AUMs on Montezuma Allotment  
Prior to 1994 FMUD 889 Cattle Year Round at 10,668 AUMs  
After 1994 FMUD 992 Cattle Year Round at 8,927 AUMs

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**Table 25.0 - Temporary Non-Renewable Authorization for the Montezuma Allotment from 2001 to 2006**

While BLM cites the Montezuma Allotment is currently vacant, temporary forage allocations have been consistently issued for 4 out of 5 years, some with year-long allocations stocking rates. Also, a high proportion of TNRs have been issued during critical grazing periods, periods that BLM asserts are necessary to reduce stocking rates to support critical growth periods.

Monitoring data collected from the Montezuma Allotments will all be reflective of livestock use within the proposal area and therefore, no distinction can be made between wild equid use and livestock use.

Of particular interest is BLMs citing of livestock TNR being prevalent in the North Pasture 1, identified in table 25.0 as West, where livestock numbers ranged from 50 to 300 with a median use level of 200 cattle. BLM cites wild horse use as the cause of riparian degradation within the Pasture 1 that results in the decision to allow the area to rest for two years before releasing growing season AUMs.

Yet Pasture 1 has continuously had livestock grazing being implemented through TNR for at least 5 years and the riparian damage could not have been solely from wild horse use.

Additionally, a year round grazing allocation for North Pasture 1 was issued for 50 head of cattle in 2006 that authorized cattle utilization between 3/01/07 and 2/28/08, despite Nevada experiencing a notable and devastating drought. By 2010, the current Proposed Action will allocate more forage for ten years than any year of TNR historical grazing allocations

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Due to drought and excessive wild horse use on Pasture 1 North, this pasture would be rested during the critical growing season (March 1 to June 30) from February 28, 2008 to February 28, 2010 or until the pasture recovers.

While BLM asserts that drought and excessive wild horse use on Pasture 1 North requires the pasture to be rested during the critical growing season, how does that explain the issuance of a TNR if resource damage was occurring due to wild horse populations? BLM cites that wild horses had moved outside the HMA boundaries into North Pasture 1 and as a result, caused excessive resource utilization. BLM also stated that wild horses were removed in September 2006. So, if wild horses damaged resources so extensively that Pasture North 1 now requires

closure and rest, then why did BLM authorize a TNR of 600 AUMs to support 50 head of cattle throughout the entire year, including the critical growing period?

How does the TNR allocations comply with the following information presented under the Proposed Action on page 50?

Rest during the critical growing season, rotation of livestock, and carrying capacity allocations are the main features of the Proposed Action that would help to ensure successful grazing management.

Furthermore, the BLM asserts on page that

The direct impacts of the No Action Alternative would be the following: current livestock and wild horse management practices would continue. The allotment would remain vacant and a ten-year grazing lease would not be issued to Mr. Johns. The entire Montezuma Allotment would be available under TNR authorization at the discretion of the BLM. The allotment boundary changes would not occur within this allotment.

Then BLM goes on to describe the current management being implemented under the No Action Alternative, which includes current issuance of TNR, is resulting in the non-attainment of the Tonopah RMP and Standards for Rangeland Health.

“The indirect impacts of the No Action Alternative would be that non-attainment of the Tonopah RMP objectives, Standards for Rangeland Health and multiple use objectives would continue. Refer to Appendix A for a more detailed discussion.”

If the current issuance of TNR grazing allocations is resulting in non-attainment of Rangeland Health Standards, how does the permanent issuance of those grazing allocations indicate the the Rangeland Health Standards will now be met?

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Table 27.0 History of Grazing Use in the Razorback Allotment shows that in 1994, when BLM asserts that most of the rangeland monitoring data was gathered, 350 head of cattle were run through the allotment. This number of livestock ranged from almost twice as much as any other recorded historical “high” and up to 14 times higher on the lowest allocations (not including 0 use), any other year of livestock use between 1991 and 2007.

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Table 10.0 – Proposed Ten-Year Grazing Lease and Forage Reserve for the Razorback Allotment issues up to 1,390 AUMs for dormant season use and a maximum herd size of 215 cattle while the current permitted use level is merely 106 cattle and 962 AUMs as per Table 26.0.

Table 6.0 – Proposed Permitted AUMs indicate a maximum of 1,685 AUMs for the Beatty Cattle Co. and the Razorback Allotment while Table 10.0 cites only 1,390 AUMs as being authorized through the Proposed Decision.

BLM then goes on to state on page 52:

The reduction in AUMs is due to the reduction in the Razorback Allotment acreage and the carrying capacity of the potential native communities. These reductions are necessary to assure the long-term productivity of the vegetative resources.

How is the Proposed Action in alignment with the stance that AUMs have been reduced to assure the long-term productivity of the vegetative resources when in actuality, they are being increased, both in AUMs and in allowing over 100% more cattle within the allotment pastures?

Furthermore, BLM states that the direct impacts of the No Action Alternative would be a reduction in livestock AUMs would not occur and the indirect impacts of the No Action Alternative would be that non-attainment of Tonopah RMP objectives (like selling off land?) and Standards of Rangeland Health would continue.

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The Forage Reserve pastures would benefit Mr. Johns and the Beatty Cattle Company because they would be able to establish a pasturing agreement with qualified applicants for a minimal profit. The BLM AUMs rate, plus a surcharge for the pasturing agreement, would be applicable. These permittees would benefit from the residual payments made to them, after BLM fees. This Proposed Action would raise the economic benefit both the permittees and the counties.

While the economic needs and stability of Mr. Johns and Beatty Cattle Company is of due consideration, when weighted against the economic needs and stability of the nation and the undue and unfair tax support required of the citizens as a whole to improve the financial situation of only two individuals, even at the expense of providing federal funding for other programs within Nye and Esmerald Counties that would off set the increased purchasing powers.

Start on page 57.