

REPLY TO: 1950/2620

Date: June 29, 1993

Bill Baker
Area Manager, Wells Resource Area
Bureau of Land Management
Elko, NV 89801

Dear Bill:

Thank you for the opportunity to comment on your Wells RMP Elk Amendment Preliminary scoping document. I would like to provide you with our comments as an adjacent land management agency.

The Ruby Mountains Ranger District (RMRD) provides forage to cattle, sheep and wild horses as well as deer, bighorn sheep and mountain goats. Through numerous studies from the 1960s to the present, it is apparent that the majority of the suitable [for livestock] ranges are at some level of overstocking and not at Desired Future Condition. Given these existing conditions, the District cannot sustain additional grazers in competition with domestic livestock.

The Humboldt National Forest Land and Resource Management Plan (LRMP) in Goal #14, Objective (g) states: "Consider reintroductions of indigenous wildlife and fish species where vacant niches have been identified and conflicts with other resources can be resolved." At this point the RMRD has no identified vacant niches nor have we areas where conflicts could be resolved. Additionally, any future vacant niches would not be filled until Desired Future Condition has been reached.

Any elk planned for within the Wells Resource Area will likely be on the RMRD. Your maps for the amendment show elk presently occupying habitat 15 to 18 miles from the Forest boundary, however, elk are reported to have been seen in Clover Valley and may already be on the Forest. Even though NDOW is committed to removing elk if problems or resource damage are proven to occur on the RMRD or on private land, the responsibility to monitor or prove resource problems lies with the land owner or manager. Monitoring will be very costly and time-consuming because of the similar feeding habits of elk and livestock. The RMRD has no resources programmed for elk use monitoring.

Your preliminary scoping document states that "the Wells RMP amendment will make elk planning determinations for all public lands located within the planning area boundary including those public agencies administered by other federal agencies." Decisions for non-BLM public lands would have to be made through an Interagency Agreement. Is such an agreement planned to be a part of this amendment? We have made planning decisions such as those noted above in our 1985 Humboldt National Forest LRMP.

The priority on the RMRD is to implement appropriate management strategies and proper stocking on our grazing allotments, but we will be in the process for some time. Once implemented, however, it will take a number of years to reach desired future vegetative condition, especially given our





normally droughty climate regime. Additional grazing pressure by elk during that time will slow or possibly even halt vegetative recovery.

Elk have certain habitat requirements. My staff's previous experience with elk management has provided them with certain skills in this area. We feel the habitat on the Ruby Mountains and East Humboldt range is not extensive enough for many elk, even as summer range. Further, given topography and established allotments, there is little or no opportunity to develop grazing systems that work around and with elk as is the case in other areas of the west.

These comments are specific to the Ruby Mountains Ranger District and not the Humboldt National Forest. As you know, the Forest manages for and promotes the reintroduction of elk on other Ranger Districts. I hope that these comments will assist you in development of your NEPA document.

Sincerely,

A handwritten signature in cursive script that reads "Mont E. Lewis, Jr.".

MONT E. LEWIS, Jr.
District Ranger

cc: Supervisor's Office, HNF

