

**APPENDIX G-2: CLARIFICATION - STATE OF NEVADA**



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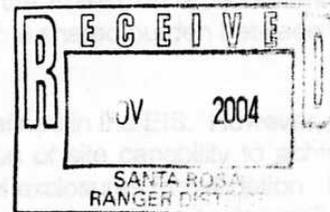
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November 3, 2004

Jose Noriega, District Ranger  
Santa Rosa Ranger District  
1200 Winnemucca Blvd. East  
Winnemucca, NV 89445



Dear Mr. Noriega:

The Martin Basin permittees and the Nevada Department of Agriculture wish to clarify Alternative 4. This alternative was developed on a few very basic and simple principles.

- 1) Permittees would initiate completion or updating Allotment Management Plans (a Forest Service responsibility). These plans would describe desired specific resource conditions of allotments and identify site specific issues. Upon mutual agreement between permittee and Forest Service (FS) range staff, the permittees would initiate developing draft Allotment Management Plans (AMP) including an appropriate grazing management system defining resource goals and objectives, identifying the desired plant communities or conditions needed to meet land use goals consistent with site capabilities. Alternative 4 accepts FS use of Vegetation Matrices as defined in the EIS. The management system would be implemented as an active adaptive management approach which would ensure that resource conditions are not adversely affected on an annual basis and desired resource conditions are met or trending towards achievement over a three year or longer term. FS provides input from the beginning to end in the process from identification and description of resource conditions and issues to review and acceptance of the grazing and monitoring plan.

Time frames are set forth to ensure that both permittees and FS respond to the need to develop AMP's in a timely manner.

- 2) Alternative 4 would maintain existing utilization standards defined in Amendment 2 to the Forest Plan by FS on each allotment. Once a permittee develops site specific and FS approved AMP, utilization standards may or may not be retained, rather they should be

used as within-season triggers and annual short-term indicators as described in the Idaho University Stubble Height Report. Utilization standards would not continue to be used by FS as performance standards. Utilization Standards as described in Amendment 2 to the Forest Plan were intended to clarify the definition of minimum standards to achieve satisfactory ecological condition. The development of AMP's and site specific resource objectives and active adaptive management accomplishes this directive. Amendment 2 further provides that utilization standards set forth in the amendment may be exceeded if supporting evidence is provided. This is accomplished and quantified through trend monitoring in Alternative 4. The intent of Amendment 2 was to achieve satisfactory ecological conditions throughout the Forest on an allotment by allotment basis. That is also the intent of Alternative 4 with a shared burden between the FS and permittee and a defined time frame.

- 3) Alternative 4 accepts FS use of Vegetation Matrices as defined in the EIS. However, the Alternative conditions this acceptance upon determination of site capability to achieve matrix descriptions through construction and monitoring of exclosures for validation. It is also intended that FS use the MB project which has soils and ecological site descriptions provided by NRCS to further validate the matrices.

Therefore, it is the opinion of the proponents of Alternative 4 that this alternative does not require an amendment to the Forest Plan; rather it requires a different interpretation of Amendment 2 by FS than has historically been the case. Proper analysis of Alternative 4 will require a change in the management paradigm historically employed by FS that utilization standards and conformity with those standards will automatically result in achievement of satisfactory ecological conditions. What is being offered to FS through Alternative 4 is a scientifically tested and accepted management approach that:

- Accurately identifies physically possible resource conditions
- Establishes measurable and achievable objectives, understood and mutually acceptable to FS and permittee
- Provides a highly responsive and flexible grazing management system (required by law and desired by all) that does not merely protect resources but actually guides management actions towards achievement
- Ultimately reduces resource conflicts that have escalated on the Forest since implementation of Amendment 2 and provides for multiple resource values and reduced expense by FS

We trust that this letter has helped clarify the intent and purpose of Alternative 4 and will guide appropriate analysis of the range of effects of this alternative for inclusion in the Final Martin Basin EIS. If you have any further questions or require additional clarification, please