



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Carson City District Office  
5665 Morgan Mill Road  
Carson City, Nevada 89701  
PH: (702) 885-6000

IN REPLY REFER TO:  
4400  
(NV-03200)

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

SEP- 5 1997

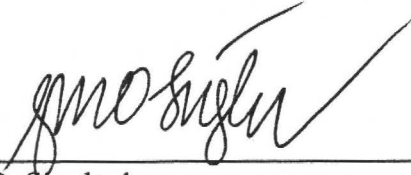
Dear Interested Public:

About a month ago, you received a copy of the Multiple-Use Decision for the Wassuk Herd Management Area. It was provided as a "Proposed" decision subject to protest as specified in the cover letter dated August 6, 1997. The protest period has ended. Comments were submitted by Joanne Hardesty, but no protests were received; consequently, the Multiple-Use Decision dated August 6, 1997, is now the Final Decision for the Wassuk Herd Management Area.

In accordance with 43 CFR §4160.4 and 43 CFR §4.400, within 30 days of receipt of this letter, any person whose interest is adversely affected by the Final Multiple Use Decision may file an appeal of that decision. The appeal shall state the reasons, clearly and concisely, why the appellant thinks the final decision is in error. The appeal must be filed in accordance with the procedures outlined in the enclosed Form 1842-1, Information on Taking Appeals to the Board of Land Appeals.

In accordance with 43 CFR §4.21, within 30 days of receipt of this letter, you may file a petition for stay (suspension) of the decision *together* with your appeal. The appellant has the burden of proof to demonstrate that a stay should be granted and show sufficient justification based on the following standards:

- (1) The relative harm to the parties, if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and;
- (4) Whether the public interest favors granting the stay.

  
\_\_\_\_\_  
John O. Singlaub  
District Manager  
Carson City District

1 Enclosure:

1. Form 1842-1, Information on Taking Appeals



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Carson City District Office  
1535 Hot Springs Road  
Carson City, Nevada 89706-0638  
PH: (702) 885-6100

IN REPLY REFER TO:  
4400  
(NV-03580)

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

AUG 6 1997

Dear Interested Public:

Enclosed is a copy of the Proposed Multiple Use Decision for the Wassuk Herd Management Area (HMA). This Decision follows the Black Mountain, Butler Mountain and Gray Hills Allotment Evaluations, which you received earlier this year. Accompanying the Decision are three sets of the documents (i.e., one set for each Allotment Evaluation), containing an errata, and the last two sections of each Evaluation.

In accordance with 43 CFR §4160.2, if you wish to protest this Proposed Decision, you are allowed 15 days from the receipt of this decision to file such protest with the Assistant District Manager, Renewable Resources, 1535 Hot Springs Road, Suite 300, Carson City, Nevada 89706-0638. The protest should state the reasons, clearly and concisely, why you think the decision is in error (§4160.2).

Although 43 CFR §4770.3 and 43 CFR §6000 do not mention a protest, for the purpose of consistency, the wild horse and wildlife elements of the Proposed Multiple Use Decision are being treated as protestable.

Note that after the 15-day protest period, a Final Multiple Use Decision will be issued.

  
John Matthiessen  
Assistant District Manager  
Renewable Resources

4 Enclosures:

1. Errata and Additions, Black Mountain Allotment Evaluation
2. Sections VII and VIII, Black Mountain Allotment Evaluation
3. Errata and Additions, Butler Mountain Allotment Evaluation
4. Sections VII and VIII, Butler Mountain Allotment Evaluation
5. Errata and Additions, Gray Hills Allotment Evaluation
6. Sections VII and VIII, Gray Hills Allotment Evaluation
7. Wassuk Herd Management Area Multiple Use Decision

Mailing List:

ERRATA AND ADDITIONS TO  
BLACK MOUNTAIN ALLOTMENT EVALUATION

Please add the attached Sections VII and VIII to your copy of the BLACK Mountain Allotment Evaluation. Place these sections immediately after Technical Recommendations (page 23). In addition, the following corrections should be made.

**Table of Contents** Add the following two sections after Section VI D.

<b>VII. CONSULTATIONS.....</b>	<b>19</b>
<b>VIII. MANAGEMENT ACTIONS SELECTED .....</b>	<b>21</b>

## VII. CONSULTATIONS

In June, 1995, a scoping letter was sent out to interested publics to request any data or information related to the three grazing allotments that contain the Wassuk Herd Management Area (HMA). All comments received were considered in the preparation of the allotment evaluations.

On March 14, 1997, the Black Mountain, Butler Mountain and Gray Hills Allotment Evaluations were sent out to the following organizations and individuals:

Nevada Division of Wildlife  
Resource Concepts Inc.  
International Society for the Protection of Mustangs & Burros  
Joanne Hardesty  
Craig C. Downer  
Hudson Glimp  
United States Forest Service, Bridgeport Ranger District  
Bobby Royle  
Lyon County Public Lands Commission  
Nevada Commission for the Preservation of Wild Horses  
Wild Horse Organized Assistance  
ELW Ranches, Inc.  
George C. Roberts 1990 Trust

Copies of the evaluations were also sent to the Nevada State Clearinghouse for distribution among state agencies.

When reviewing the comments received during the public review, it was noticed that some individuals on the interested public list had not been sent evaluations. Therefore, on June 26, 1997, the Allotment Evaluations were sent to the following organizations and individuals:

Natural Resource Defense Council  
Sierra Club, Toiyabe Chapter  
The Nature Conservancy  
Mineral County Public Land Advisory Board  
Nevada Cattlemen's Association  
Bureau of Indian Affairs, Western Nevada Agency  
Walker River Paiute Tribe  
U.S. Fish and Wildlife Service, Nevada State Office  
United States Senator Richard H. Bryan  
United States Senator Harry Reid  
United States Congressman James Gibbons

Comments on the evaluations were received from Hudson A. Glimp (for ELW Ranches), the Commission for the Preservation of Wild Horses, Joanne Hardesty, Nevada Department of Environmental Protection, Nevada Natural Heritage Program, and Nevada Division of Water Resources.

Pertinent comments are summarized and addressed below. Note that some of the errors pointed out in the comments are addressed in the Errata that accompany this section.

- A. Several comments acknowledged that the proposed AML recommended for the Wassuk HMA is larger than the 1995 census.
- B. There was some confusion on why these evaluations addressed rangeland health as well as ecological status. Subsection 4180 of the Bureau's grazing regulations requires that standards and guidelines for rangeland health be developed and implemented. Accordingly, standards and guidelines for rangeland health were developed in consultation with the Sierra Front / Northwest Great Basin Resource Advisory Council and approved by Secretary Interior Bruce Babbitt on February 12, 1997.

Implementation of these standards and guidelines is to take place in two phases, the second phase being the allotment evaluation process. Therefore, it is required that these evaluations address the same elements of rangeland health as used in the Standards and Guidelines developed for the Carson City District.

- C. Some comments wanted total exclusion of one use over the enhancement of another use. The BLM, however is mandated to pursue multiple use management of the public lands.
- D. One comment noted that data was collected during a "drought period" and should be adjusted accordingly. The precipitation data presented in Section IV.C. of this evaluation did show a trend of low precipitation in the late 1980s (following extremely high precipitation in the early 1980s). However, the years between 1990 and 1995 show normal fluctuations when compared to the all the data from 1935 to 1995. The use pattern mapping in which the calculations in Appendix II was done in 1995.
- E. One comment objected to more AUMs being provided for livestock than wild horses in the Black Mountain Allotment. First, it must be realized that less than 9% of the Wassuk HMA overlaps into the Black Mountain Allotment.. Since sheep can be herded into areas outside the HMA, livestock are cable of using more of the allotment.
- F. One comment noted the presence of cheatgrass (*Bromus tectorum*) and wanted to know the effect of animal impacts on promoting "further invasion and establishment of noxious or exotic plant species". The seed sources for many introduced species are constantly being transported throughout the State by the wind, vehicles, migratory wildlife, horse-back riders, etc. This is evidenced in the fact that introduced annual grasses such as cheatgrass have become dominant in areas that are not grazed.<sup>2</sup> The problem is not whether these species will become established, but rather if perennial plant communities are healthy enough to compete once these introduced annual plants become established. Therefore, in analyzing the photo plots, the interdisciplinary team addressed such factors as bare ground, cover and density of perennial plants.

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<sup>2</sup>Tausch, Robin J., Tony Svejcar, J. Wayne Burkhardt (1992) Patterns of Annual Grass Dominance on Anaho Island: Implications for Great Basin Vegetation Management. Paper presented at the Symposium on Ecology, Management and Restoration of Intermountain Annual Rangelands, Boise, ID, May 18-22, 1992.

It also must be considered that conditions for the establishment of cheatgrass are often the same conditions that favor native annuals. Trying to prevent the establishment of the "exotic" annuals may also restrict the establishment of some of our native plants.

- G. One comment stressed that the impacts to the "cryptobiotic soil crust communities" should be addressed. Cryptobiotic communities refer to the interaction of cryptogams and their environment (cryptogams are plants such as ferns, moss, lichen, and fungus that reproduce by spores rather than flowers and seed). These species may be dominate in some plant communities and are important in soil stabilization, nutrient interaction, etc. In the Butler Mountain Allotment and vicinity, the cryptobiotic communities are represented by fungus and algae-covered soil crusts, although the number of species present might be considered complex.

In cases where no opportunity exists to advance in seral stages, a cryptogam dominated site may be better left alone. However, according to the Ecological Site Descriptions published by the NRCS, the ecological sites in the Butler Mountain Allotment have the potential to advance in seral stage to plant communities dominated by grasses, forbs and shrubs in addition to cryptogams. These later seral plant communities would provide more suitable habitat for wildlife, wild horses and livestock than the cryptogam dominant communities. Therefore, the management actions proposed in this evaluation are intended to produce mid to late seral plant communities rather than early seral.

### **VIII. MANAGEMENT ACTIONS SELECTED**

The Walker RMP includes the objective to protect and maintain riparian areas in a good or better condition. Good condition or better now equates to "late seral" or "potential natural community" ecological status. The adoption of the Riparian / Wetland Initiative for the 1990s, and the Standards and Guidelines in accordance with 43 CFR §4180.2, has made it mandatory to evaluate other factors than just ecological status in determining the health of riparian habitats. Since these factors have been addressed in national policy, there is no need to include it within the Multiple Use Decision. Therefore, the recommendation to modify the riparian objective (page 18), is not included in the Multiple Use Decision.

All management other actions stated under Section VI, Technical Recommendations (pages 16 to 18) are incorporated into the Proposed Multiple Use Decision.

ERRATA AND ADDITIONS TO  
BUTLER MOUNTAIN ALLOTMENT EVALUATION

Please add the attached Sections VII and VIII to your copy of the Butler Mountain Allotment Evaluation. Place these sections immediately after Technical Recommendations (page 23). In addition, the following corrections should be made.

**Table of Contents** Add the following two sections after Section VI E.

<b>VII. CONSULTATIONS.....</b>	<b>24</b>
<b>VIII. MANAGEMENT ACTIONS SELECTED .....</b>	<b>27</b>

**Page 19, under objective B.2.i (Continue rangeland and watershed monitoring...), third paragraph, first sentence.** Change "grazing preference" to "the total number of animal unit months of specified grazing". The sentence should read as follows:

"Monitoring data has identified that no adjustment in the total number of animal unit months of specified grazing is necessary."



## VII. CONSULTATIONS

In June, 1995, a scoping letter was sent out to interested publics to request any data or information related to the three grazing allotments that contain the Wassuk Herd Management Area (HMA). All comments received were considered in the preparation of the allotment evaluations.

On March 14, 1997, the Black Mountain, Butler Mountain and Gray Hills Allotment Evaluations were sent out to the following organizations and individuals:

Nevada Division of Wildlife  
Resource Concepts Inc.  
International Society for the Protection of Mustangs & Burros  
Joanne Hardesty  
Craig C. Downer  
Hudson Glimp  
United States Forest Service, Bridgeport Ranger District  
Bobby Royle  
Lyon County Public Lands Commission  
Nevada Commission for the Preservation of Wild Horses  
Wild Horse Organized Assistance  
ELW Ranches, Inc.  
George C. Roberts 1990 Trust

Copies of the evaluations were also sent to the Nevada State Clearinghouse for distribution among state agencies.

When reviewing the comments received during the public review, it was noticed that some individuals on the interested public list had not been sent evaluations. Therefore, on June 26, 1997, the Allotment Evaluations were sent to the following organizations and individuals:

Natural Resource Defense Council  
Sierra Club, Toiyabe Chapter  
The Nature Conservancy  
Mineral County Public Land Advisory Board  
Nevada Cattlemen's Association  
Bureau of Indian Affairs, Western Nevada Agency  
Walker River Paiute Tribe  
U.S. Fish and Wildlife Service, Nevada State Office  
United States Senator Richard H. Bryan  
United States Senator Harry Reid  
United States Congressman James Gibbons

Comments on the evaluations were received from Hudson A. Glimp (for ELW Ranches), the Commission for the Preservation of Wild Horses, Joanne Hardesty, Nevada Division of Environmental Protection, Nevada Natural Heritage Program, and Nevada Division of Water Resources.



Pertinent comments are summarized and addressed below. Note that some of the errors pointed out in the comments are addressed in the Errata that accompany this section.

- A. Several comments acknowledged that the proposed AML in the Butler Mountain HMA is larger than the 1995 census.
- B. There was some confusion on why these evaluations addressed rangeland health as well as ecological status. Subsection 4180 of the Bureau's grazing regulations requires that standards and guidelines for rangeland health be developed and implemented. Accordingly, standards and guidelines for rangeland health were developed in consultation with the Sierra Front / Northwest Great Basin Resource Advisory Council and approved by Secretary Interior Bruce Babbitt on February 12, 1997.

Implementation of these standards and guidelines is to take place in two phases, the second phase being the allotment evaluation process. Therefore, it is required that these evaluations address the same elements of rangeland health as used in the standards and guidelines developed for the Carson City District.

- C. Some comments wanted total exclusion of one use over the enhancement of another use. The BLM, however is mandated to pursue multiple use management of the public lands.
- D. One comment noted that data was collected during a "drought period" and should be adjusted accordingly. The precipitation data presented in Section IV.C. of this evaluation did show a trend of low precipitation in the late 1980s (following extremely high precipitation in the early 1980s). However, the years between 1990 and 1995 show normal fluctuations when compared to the all the data from 1935 to 1995. The use pattern mapping in which the calculations in Appendix II was done in 1995.
- E. One comment noted in reference to Appendix II (Potential Stocking Level in Herd Management Area) that since the average use in Butler Mountain was approximately 10% and the desired utilization is 27.5%, the potential stocking level for Butler Mountain Allotment should be at least twice the number counted in 1995. It was recognized at the time of the evaluation that wild horses are not restricted by allotment boundaries and therefore are free to move between the allotments. Therefore, the number of wild horses counted at one point in time may only be in that specific area for a short period and actually spend more time in another allotment. This was evidenced by the variation in average utilization between the allotments: Butler Mountain Allotment was 10.7%, while Gray Hills Allotment was 23.9%. Therefore, the potential stocking level was split between the allotments using acreages weighted by utilization data (i.e., the percentage of the potential stocking level was split based on how much use was made in the allotment, not how many horses were counted in the specific portion of the HMA during a one point in time survey).
- F. One comment objected to more AUMs being provided for livestock than wild horses in the Butler Mountain Allotment. Approximately 54% of the Butler Mountain Allotment is contained within the Wassuk HMA. However, the wild horses prefer other portions of the HMA (refer to previous comment). This characteristic of the herd is reflected in the AUM calculation for Butler Mountain being smaller than Gray Hills. The manner in

which the wild horses use these areas can't be altered. An attempt can be made to balance use within HMA amongst all users. Through herding, areas less preferred by wild horses can potentially receive more use from the sheep.

- G. One comment requested that we explain how pinyon-juniper woodlands influence the proper functioning condition of riparian areas discussed on page 17 (objective B.2.b.) of this evaluation. Due to the ability of pinyon and juniper trees to utilize soil moisture before many of the grass, forb and shrub species break dormancy and the ability of the taproot to draw moisture at greater levels than most understory species<sup>1</sup>, a plant community dominated by mature pinyon and juniper trees may have a great impact on available soil moisture (and the flow of perennial springs in the vicinity). Therefore a change in a shrub-grassland ecological site to a pinyon - juniper woodland may result in a decrease in riparian habitats. As a result, Chipmunk Springs was identified as functional, but at possible risk in the future due to the expansion of pinyon-juniper woodlands.
- H. One comment noted the presence of cheatgrass (*Bromus tectorum*) and wanted to know the effect of animal impacts on promoting "further invasion and establishment of noxious or exotic plant species". The seed sources for many introduced species are constantly being transported throughout the State by the wind, vehicles, migratory wildlife, horse-back riders, etc. This is evidenced in the fact that introduced annual grasses such as cheatgrass have become dominant in areas that are not grazed.<sup>2</sup> The problem is not whether these species will become established, but rather if perennial plant communities are healthy enough to compete once these introduced annual plants become established. Therefore, in analyzing the photo plots, the interdisciplinary team addressed such factors as bare ground, cover and density of perennial plants.

It also must be considered that conditions for the establishment of cheatgrass are often the same conditions that favor native annuals. Trying to prevent the establishment of the "exotic" annuals may also restrict the establishment of some of our native plants.

- I. One comment stressed that the impacts to the "cryptobiotic soil crust communities" should be addressed. Cryptobiotic communities refer to the interaction of cryptogams and their environment (cryptogams are plants such as ferns, moss, lichen, and fungus that reproduce by spores rather than flowers and seed). These species may be dominate in some plant communities and are important in soil stabilization, nutrient interaction, etc. In the Butler Mountain Allotment and vicinity, the cryptobiotic communities are represented by fungus and algae-covered soil crusts, although the number of species present might be considered complex.

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<sup>1</sup>Everett, Richard L. and Steven H. Sharrow (1983). Response of understory species to tree harvesting and fire in pinyon-juniper woodlands. In Proceedings of Symposia: Managing Intermountain Rangelands - Improvement of Range and Wildlife Habitats.

<sup>2</sup>Tausch, Robin J., Tony Svejcar, J. Wayne Burkhardt (1992) Patterns of Annual Grass Dominance on Anaho Island: Implications for Great Basin Vegetation Management. Paper presented at the Symposium on Ecology, Management and Restoration of Intermountain Annual Rangelands, Boise, ID, May 18-22, 1992.

In cases where no opportunity exists to advance in seral stages, a cryptogam dominated site may be better left alone. However, according to the Ecological Site Descriptions published by the NRCS, the ecological sites in the Butler Mountain Allotment have the potential to advance in seral stage to plant communities dominated by grasses, forbs and shrubs in addition to cryptogams. These later seral plant communities would provide more suitable habitat for wildlife, wild horses and livestock than the cryptogam dominant communities. Therefore, the management actions proposed in this evaluation are intended to produce mid to late seral plant communities rather than early seral.

### **VIII. MANAGEMENT ACTIONS SELECTED**

The Walker RMP includes the objective to protect and maintain riparian areas in a good or better condition. Good condition or better now equates to "late seral" or "potential natural community" ecological status. The adoption of the Riparian / Wetland Initiative for the 1990s, and the Standards and Guidelines in accordance with 43 CFR §4180.2, has made it mandatory to evaluate other factors than just ecological status in determining the health of riparian habitats. Since these factors have been addressed in national policy, there is no need to include it within the Multiple Use Decision. Therefore, the recommendation to modify the riparian objective (page 23), is not included in the Multiple Use Decision.

All other management actions stated under Section VI, Technical Recommendations (pages 19 to 23) are incorporated into the Proposed Multiple Use Decision.

ERRATA AND ADDITIONS  
GRAY HILLS ALLOTMENT EVALUATION

Please add the attached Sections VII and VIII to your copy of the Gray Hills Allotment Evaluation. Place these sections immediately after Technical Recommendations Section (page 26). Place the Bibliography section after the new Section VIII (Management Actions Selected) and renumber pages (new numbers are 32 and 33). In addition, the following corrections should be made.

**Page iv, Table of Contents.** Add the following two sections after section VI C and change the page number of Bibliography.

VII. <u>CONSULTATIONS</u> .....	27
VIII. <u>MANAGEMENT ACTIONS SELECTED</u> .....	32
BIBLIOGRAPHY .....	34

**Page 22, Conclusions Section, second paragraph under allotment objectives relating to wild horses, last sentence.** As discussed on page 19 and 20, it is recommended that the livestock season of use be adjusted to exclude livestock after March 15. Therefore proper use factors in the Summit Springs pasture would only apply to wild horses after March 15. The revised statement should read:

"Therefore, if use levels after March 15 by wild horses should exceed proper use levels, a selective removal may be necessary."

**New Page 32, Bibliography.** Add the following reference source:

Tausch, Robin J., Tony Svejcar, J. Wayne Burkhardt (1992) Patterns of Annual Grass Dominance on Anaho Island: Implications for Great Basin Vegetation Management. Paper presented at the Symposium on Ecology, Management and Restoration of Intermountain Annual Rangelands, Boise, ID, May 18-22, 1992.

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## VII. CONSULTATIONS

In June, 1995, a scoping letter was sent out to interested publics to request any data or information related to the three grazing allotments that contain the Wassuk Herd Management Area (HMA). All comments received were considered in the preparation of the allotment evaluations.

On March 14, 1997, the Black Mountain, Butler Mountain and Gray Hills Allotment Evaluations were sent out to the following organizations and individuals:

Nevada Division of Wildlife  
Resource Concepts Inc.  
International Society for the Protection of Mustangs & Burros  
Joanne Hardesty  
Craig C. Downer  
Hudson Glimp  
United States Forest Service, Bridgeport Ranger District  
Bobby Royle  
Lyon County Public Lands Commission  
Nevada Commission for the Preservation of Wild Horses  
Wild Horse Organized Assistance  
ELW Ranches, Inc.  
George C. Roberts 1990 Trust

Copies of the evaluations were also sent to the Nevada State Clearinghouse for distribution among state agencies. On April 9, 1997, a meeting was held between Bureau personnel and representatives of the ELW Ranches, Inc. Several points were agreed upon, including the following:

1. BLM representatives and ELW Ranches personnel will meet annually for a biological assessment of the allotment and to determine what grazing treatments will be applied to specific areas. This will emphasize rapid response to resource management rather than long term specific rotation plans.
2. The response to resource management will be evaluated frequently to determine if it is accomplishing allotment objectives.
3. Distribution of water on this allotment needs to be reevaluated.
4. BLM, ELW Ranches and the University of Nevada, Reno will explore opportunities for research and demonstration projects that document how grazing management can be used to improve rangelands.

When reviewing the comments received during the public review, it was noticed that some individuals on the interested public list had not been sent evaluations. Therefore, on June 26, 1997, the Allotment Evaluations were sent to the following organizations and individuals:

Natural Resource Defense Council  
Sierra Club, Toiyabe Chapter  
The Nature Conservancy  
Mineral County Public Land Advisory Board  
Nevada Cattlemen's Association  
Bureau of Indian Affairs, Western Nevada Agency  
Walker River Paiute Tribe  
U.S. Fish and Wildlife Service, Nevada State Office  
United States Senator Richard H. Bryan  
United States Senator Harry Reid  
United States Congressman James Gibbons

Comments were received from Hudson A. Glimp (for ELW Ranches), the Commission for the Preservation of Wild Horses, Joanne Hardesty, Nevada Department of Environmental Protection, Nevada Natural Heritage Program, and Nevada Division of Water Resources.

Pertinent comments are summarized and addressed below. Note that some of the errors pointed out in the comments are addressed in the Errata that accompanied this section.

- A. Several commentors acknowledged that the proposed AML in the Wassuk HMA is larger than the 1995 census.
- B. There was some confusion on why these evaluations addressed rangeland health as well as ecological status. Subsection 4180 of the Bureau's grazing regulations requires that standards and guidelines for rangeland health be developed and implemented. Accordingly, standards and guidelines for rangeland health were developed in consultation with the Resource Advisory Councils and approved by Secretary Interior Bruce Babbitt on February 12, 1997.

Implementation of these standards and guidelines is to take place in two phases, the second phase being the allotment evaluation process. Therefore, it is required that these evaluations address the same elements of rangeland health as used in the Standards and Guidelines developed for the Carson City District.

- C. Some comments wanted total exclusion of one use over the enhancement of another use. The BLM has been mandated to pursue multiple use management of the public lands. Therefore, the Carson City District will seek solutions that are fair to the most uses as well as producing a healthy environment.
- D. One comment noted that data was collected during a "drought period" and should be adjusted accordingly. The precipitation data presented in Section IV.C. of this evaluation did show a trend of low precipitation in the late 1980s (following extremely high precipitation in the early 1980s). However, the years between 1990 and 1995 show normal fluctuations when compared to the all the data from 1935 to 1995. Although the precipitation went from a low in the late 1980s to "normal" in the early 1990s (i.e., and upward trend), the frequency studies in the Gray Hills allotment show a *downward* trend.



- E. One comment stated that we are abandoning the *Nevada Rangeland Monitoring Handbook* (hence forth referred to simply as NRMH) by stressing rangeland health and trend in addressing proper use by livestock and wild horses. This comment was referring to the table showing "degrees of allowable use" discussed on pages 22 and 23 of the NRMH. The NRMH states (emphasis added): "[t]his table is meant to be used as a *guideline only* and should be tempered with local judgement on a case-by-case basis." The NRMH also states (emphasis added):

"The degree of allowable use identified for a key species for one or more years serves as a guideline or reference point to evaluate the impacts grazing *may* be having on the overall welfare of the plant community. In monitoring degrees of utilization, the *primary concern is the trend in the plant community resulting from various levels of use.*"

Based on these cautions in the NRMH, the interdisciplinary team preparing this evaluation determined that it was essential to consider the relationship of animal impacts and the trend in the health of plant communities rather than simply accepting the percentages in the NRMH with no supporting data.

It should also be noted that the evaluation does address proper use levels. The relationship of trend and utilization was discussed on pages 19 and 20 (Conclusions Section). On page 20, a problem was noted in the Summit Springs Pasture resulting from prolonged animal impacts during the critical growing season of winterfat. Therefore, it is recommended that the livestock season of use be adjusted and a *proviso* be included in the wild horse recommendations relating to physiological requirements of vegetation. These recommendations were made after exploring the relationship of winterfat within the specific ecological site and what aspects of animal impacts were detrimental to the biological requirements of that particular plant species rather than merely assuming that *any* use by herbivores is bad.

- F. One comment noted that we are applying proper use to wild horses but not livestock (in reference to discussion on page 22). The reader did indeed find an error as noted in the Errata. However, the modified statement may still be confusing if taken out of context. The modified statement should read as follows:

"Therefore, if use levels after March 15 by wild horses should exceed proper use levels, a selective removal may be necessary."

As stated previously, this was in reference to the downward trend in winterfat noted in Summit Springs Pasture. Due to this problem, the spring removal date for livestock was adjusted to March 15 (refer to page 20, Conclusions Section). Since wild horses graze yearlong within the HMA, they may be selectively gathered and removed. However, consideration is given to gathering in only the portion of the HMA where problems are occurring rather than removing wild horses throughout the HMA.



- G. One comment showed confusion on why Buckbrush Spring was classified as proper functioning condition, yet the vegetation had little new growth and appeared unhealthy. Buckbrush Spring was classified as proper function condition (PFC) because it met certain criteria as discussed in Appendix I (Glossary of Technical Terms). Although the vegetation was unhealthy, the plant community as a whole dissipated energy associated with high water flows, filtered sediment and nutrients, contributed root mass development to stabilize banks, etc. However, unhealthy vegetation may indicate that the riparian area is in a trend toward nonfunctionality and therefore, management changes may be necessary in the future.
- H. One comment noted the presence of cheatgrass (*Bromus tectorum*) and wanted to know the effect of heavy trampling and ground disturbance will have on promoting "further invasion and establishment of noxious or exotic plant species". The seed sources for many introduced species are constantly being transported throughout the State by the wind, vehicles, migratory wildlife, horse-back riders, etc. and therefore establishment of these species may be inevitable. This is evidenced in the fact that introduced annual grasses such as cheatgrass have become dominant in areas that are not grazed.<sup>1</sup> The problem is not whether these species will become established, but rather if perennial plant communities are healthy enough to compete once these introduced annual plants become established. Therefore, in analyzing the photo plots, the interdisciplinary team addressed such factors as bare ground, cover and density of perennial plants.

It also must be considered that the conditions that favor establishment of cheatgrass may also be the conditions that favor native annuals such as six-weeks fescue (*Vulpia octoflora*) and Mono County phacelia (*Phacelia moniensis*), the later species being considered as a BLM sensitive plant (refer to page 10, Threatened and Endangered Species). Trying to prevent the establishment of the "exotic" annuals may also restrict the establishment of some of our native plants.

- I. The same comment as above stressed that we should address the impacts to the "cryptobiotic soil crust communities." Cryptobiotic communities refer to the interaction of cryptogams and their environment (cryptogams are plants such as ferns, moss, alga, and fungus that reproduce by spores rather than flowers and seed). These species may be the dominant species in some plant communities and are important in soil stabilization, nutrient interaction, etc. In the Gray Hills Allotment and vicinity, the cryptobiotic communities are represented by fungus and algae-covered soil crusts, although the number of species present might be considered complex.

In cases where no opportunity exists to advance in seral stages, a cryptogam dominated site may be better left alone. However, according to the Ecological Site Descriptions

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<sup>1</sup>Refer to Tausch, etal (1992)

published by the NRCS<sup>2</sup>, the ecological sites in the Gray Hills Allotment have the potential to advance in seral stage to plant communities dominated by grasses, forbs and shrubs in addition to cryptogams. These later seral plants communities would provide more suitable habitat for wildlife, wild horses and livestock than the cryptogam dominant communities. Therefore, the management actions proposed in this evaluation are intended to produce mid to late seral plant communities rather than early seral.

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<sup>2</sup>SCS (1987), SCS (1989) and SCS (1992).

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### VIII. MANAGEMENT ACTIONS SELECTED

Technical Recommendation 2 is modified to include specific dates. To allow flexibility for more intensive livestock management based on field examinations by Bureau personnel, the second sentence in Technical Recommendation 1 under "Livestock Grazing" (page 24) is modified and moved to Technical Recommendation 2. Technical Recommendation 2 is also modified to include specific dates. These technical recommendations are modified as follows (actual wording in the decision may vary):

*Sheep will be authorized in any pasture during the dormancy of key perennial forage species used by sheep: August 15 to March 15.*

*Any pasture grazed between June 15 to August 15 (outside the normal dormancy period) will be followed by a year of rest. The dates in Management Action 1 and 2 may vary from year to year based on field examinations by BLM Range Management Specialists.*

Based on the proposal by ELW Ranches relating to a biological assessment and planning meeting every year, Technical Recommendation 5 is deleted, and Technical Recommendations 4 and 6 under "Livestock Grazing" are modified as follows (actual wording in the decision may vary):

*The pasture treatments shown in Table 8 will be included in the Gray Hills AMP. Exceptions to these treatments may be made based on coordination between Bureau personnel and the Permittee. All exceptions are subject to the other criteria in the Multiple Use Decision.*

*The permittee will be required to either meet with Bureau personnel or submit an application every year prior to grazing. In the event that the permittee does not plan to graze, another permittee may be authorized to graze.*

The recommendations allowing cattle in the Gray Hills Allotment (Technical Recommendations 7 & 8) will not be included in the Multiple Use Decision. Although cattle use was addressed in the original AMP, dual use by cattle and sheep was not addressed in neither the AMP nor this Allotment Evaluation.

The Walker RMP includes the objective to protect and maintain riparian areas in a good or better condition. Good condition or better now equates to "late seral" or "potential natural community" ecological status. The adoption of the Riparian / Wetland Initiative for the 1990s, and the Standards and Guidelines in accordance with 43 CFR §4180.2, has made it mandatory to evaluate other factors than just ecological status in determining the health of riparian habitats. Since these factors have been addressed in national policy, there is no need to include it within the Multiple Use Decision. Therefore, the recommendation to modify the riparian objective (Technical Recommendation 10), is not included in the Multiple Use Decision.

Technical Recommendation 13 (modifying the AMP) is included in the Multiple Use Decision. Since, the current permit includes the term and condition that "Grazing is to be done in accordance with the schedules of the Gray Hills (Rafter 7) AMP", there is no need to reissue the grazing permit (Technical Recommendation 12).

All other management actions stated under Section VI, Technical Recommendations (pages 24 to 26) are incorporated into the Proposed Multiple Use Decision.