United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CARSON CITY DISTRICT OFFICE 1535 HOT SPRINGS RD., STE. 300 CARSON CITY, NV 89706-0638



8/18/92

IN REPLY REFER TO:

4130 (NV-03580)

AUG 18 1992

N

Dear Interested Party:

Enclosed for your review is a copy of the Basalt Allotment Evaluation. All comments should be addressed to this office prior to September 21, 1992.

Sincerely,

John Matthiessen Area Manager Walker Resource Area

1 Enclosure: 1. Basalt Allotment Evaluation U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

BUREAU OF LAND MANAGEMENT CARSON CITY DISTRICT OFFICE 1535 HOT SPRINGS ROAD SUITE 300 CARSON CITY, NEVADA 89706

BASALT ALLOTMENT EVALUATION

PREPARED BY:

ROBERT R. MEAD RANGE CONSERVATIONIST WALKER RESOURCE AREA

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I. INTRODUCTION

- A. Allotment Name/Number: Basalt Allotment (3505)
- B. Permittee: Queen Valley Ranch
- C. Evaluation Period: 1985-1990
- D. Category/Priority: Category "M": Not assigned a priority number because no range improvements are planned.

II. INITIAL STOCKING LEVEL

A. Livestock Use

1. Preference (AUMs)

Total Preference	Suspended	Active	Temp. Non-Renew.
*519	0	*519	0

*Effective 4/26/89 as per Public Law 100-550 (National Forest and Public Lands of Nevada Enhancement Act of 1988) the active preference for the allotment was adjusted from 725 to 519 AUMs.

Kind of Livestock	Season of Use	%Fed. Range/E.O.U.
Cattle	10/01 to 03/31	100/0

2. History

Baker and Galvin received grazing privileges at the time of the establishment of the Carson City District. On 9/25/50 the base properties were sold. Use was applied for and approved for a period of two years, after which no further applications were received. Grazing privileges were lost due to failure to apply for two consecutive years.

Baker and Galvin purchased their old ranch back and then sold it to Charles H. Smith on 12/18/59. On 3/29/60, Mr. Smith made a letter of application and was granted use of Federal Range. Mr. Smith then applied for and received an active use license for the 1961/62 grazing season. After 1962, Mr. Smith made a combination of active and non-use or complete non-use totalling 725 AUMs.

By virtue of a deed dated 12/30/65, Queen Valley Ranch Company acquired the base property and former operation of Mr. Smith. Queen Valley Ranch Company is now recognized as having the Charles H. Smith grazing privileges.

An analysis was completed on 8/29/89 to determine the adjudicated grazing capacity of the Basalt allotment which was divided by the National Forest and Public Lands of Nevada Enhancement Act of 1988. Prior to this action, the allotment contained 33,617 and 3,120 acres of public and private land respectively. Preference was 725 AUMs.

After this action, the allotment contains 20,405 and 360 acres of public and private lands respectively. Preference is now shown as 519 AUMs and the basic schedule is as follows:

87 Cows 10/1 to 3/31 100% PL 521 AUMs

No allotment boundary fences exist and the only topographic barriers of any consequence exist in the extreme northeast portion of the allotment, downslope of Miller Mountain and east of Montgomery Pass. Steep mountain slopes and lack of water limit use in these areas.

B. Wild Horse and Burro Use

The Montgomery Pass Herd Management Area (HMA) is located on the western boundary of the allotment in T 2 N, R 33 E (Refer to Map No. 7, Appendix A). This HMA is also referred to as the Montgomery Pass Wild Horse territory by the U.S. Forest Service (USFS). The HMA is managed by both the USFS and the Bureau of Land Management with the Inyo National Forest as the lead agency. A Coordinated Resource Plan for the HMA was implemented in June, 1988.

The initial forage allocation was to provide for approximately 48 AUMs of forage which was the prorated demand based on an estimate of 4% of the herd management area in the allotment. Current wild horse use in the Basalt portion of the HMA is twenty four (24) head for seven (7) months (approximately October 15th to May 15th). The population appears to be stable because of mountain lion predation(*Felis concolor*) on colts.

C. Wildlife Use

There are no key or critical management areas within the allotment identified in the RMP/RPS. Sporadic use by antelope (*Antilocapra americanus*) and mule deer (*Odocoileus hemionus*) is made in the allotment.

Upland and non-game wildlife occur throughout the allotment. Some of these are mourning dove (Zenaidura macroura), chukar (Alectoris chukar), California quail (Lophortyx californicus), coyote (Canis latrans), kit fox (Vulpes macrotis), badger (Taxidea taxus), black-tailed jackrabbit (Lepus californicus), and cottontail (Sylvilagus

audubonii). Also present are a host of small mammals, birds, and reptiles.

III. Allotment Profile

A. Description

The Basalt allotment is located south of Hawthorne, Nevada. It is bounded on the east by the Mineral/Esmeralda County line and on the south by the Toiyabe National Forest Boundary. Both U.S. 6 and State Route 360 pass through the allotment (Refer to Map No. 1, Appendix A).



Figure 1 VEGETATION TYPES

B. Acreage

1. Allotment Total - 20,405 acres

2. Pastures - there are no pastures within the allotment.

C. Allotment Specific Objectives

Objectives listed under this section were taken from the Resource Management Plan (1984); Management Decisions Summary (MDS, 1986); and the Rangeland Program Summary (RPS, November 1989). Where applicable, those objectives that were similar were combined. what is this

- 1. Land Use Planning Objectives (RMP, MDS, and RPS).
 - a. Short Term
 - 1. Initially authorize livestock use at the three year average licensed use level of 519 AUMs. There will be no initial change in the active preference.
 - 2. Initially manage wild horses at present estimated population levels providing for approximately 48 AUMs of forage which is the prorated demand based on an estimate of 10% of the herd area in the allotment.
 - b. Long Term
 - 1. Continue rangeland and watershed monitoring to determine if we are meeting management objectives of 1) maintaining existing trend and condition recorded at key areas on key species; and 2) maintaining an acceptable allowable use level of 60% on key areas on key species.
 - 2. Maintain water quality and availability on public lands for livestock, wildlife, and wild horses.
 - 3. Maintain the condition of public rangelands consistent with wildlife, wild horses, and livestock objectives. Sustain productivity of wild horses and maintain the free-roaming behavior within the herd management areas.
 - 4. Maintain the existing habitat condition of the public lands so as to sustain productivity for wildlife.
- D. Other Information

There are no known Threatened, Endangered, or Sensitive plant/animal species of record. No riparian or other crucial habitat exists within the allotment. Potentially the Fletcher dark kangaroo mouse (Microdipodops megacephalus) and the Loggerhead shrike (Lanius *ludovicianus*) may be present. Both are currently candidate species.

E. Key Species

One key area has been established (8/85) in the allotment. Key species are Indian ricegrass (*Oryzopsis hymenoides*) and winterfat (*Eurotia lanata*) (Refer to Table 1, Appendix B for Phenology of Key Species and Map No. 8, Appendix A for location). Fourwing saltbush (*Atriplex canescens*), although not identified as a key species in the establishment of the key area, is being monitored due to its potential within the shrub community for the Sandy 5-8 p.z. range site.

IV. MANAGEMENT EVALUATION

A. Purpose

Instruction Memorandum No. 86-706 requires issuance of a decision or the entering into agreements within five years of the publication of the Rangeland Program Summary. This evaluation of the Basalt allotment is done in preparation for the fifth-year decision or agreement.

The purpose of the allotment evaluation process is to determine if the current grazing practices are consistent with attainment of the Land Use Plan (LUP) and allotment specific objectives for the Basalt allotment. If current grazing practices are not consistent with the attainment of these objectives, then the appropriate changes in management needed to meet the objectives will be identified and implemented.

- B. Summary of Studies Data
 - Evaluation of Key Area Refer to Appendix C for Key Management Area Evaluation Summary.

- 2. Actual Use
 - a. Livestock/Wild Horse

Actual use reports submitted by the permittee are available for the periods 11/12/86-04/04/87 and 10/01/88-03/31/89. All other years show licensed use.



Figure 2 ACTUAL USE / LIVESTOCK-WILD HORSES

b. Wildlife

The sporadic nature of use by pronghorn antelope and mule deer is such that their combined use is considered insignificant.

c. Wild Horses

A demand of 168 AUMs exists within the allotment.

3. Precipitation

The precipitation data was gathered from the publications of the Nevada Climatological Data Center. The closest available station to the allotment is located in Mina, Nevada. This data is summarized below:

The mean annual precipitation for the Mina, Nevada recording station is 4.78 inches.



Figure 3 PRECIPITATION DATA

Summation for data shown in 1983 is incomplete.

This area seems to be affected by a different weather pattern than that experienced at the Mina station. Summer thunderstorms seem to be more prevalent, of longer duration, and more intense. This is seen through the greater diversity, abundance, and productivity of key species on the Basalt allotment.

4. Utilization

a. Key Area



Utilization levels for key species are as follows:

Figure 4 UTILIZATION - KEY SPECIES

No data was gathered in 1988.

b. Use Pattern Mapping

During March/April of 1990, 1989, 1987, and 1985, use pattern mapping was completed over the entire allotment (Refer to Appendix A, Maps 2,3,4 and 5 for use pattern maps).

5. Trend

Two (2) vegetative photo trend plots were established in 1977. They have been photographed five times since 1977 (Refer to Map No. 8, Appendix A). One location is on land transferred to U.S.F.S. jurisdiction.

Frequency data has been collected at the key area on 8/29/85, 7/19/88, and 7/2/91.

Refer to Evaluation Summary (Appendix C) for the results of the frequency data.

6. Range Survey Data

Range survey data that was gathered in 1953 and compiled in 1961 on the Basalt allotment, indicate that 519 AUMs are available in the area now administered by the BLM.

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The adjudication seems to be conservative for the following reasons: 10,500 acres of sagebrush (Artemisia tridentata) is rated at 89 Acres/AUM; and the greasewood-Indian ricegrass (Sarcobatus vermiculatus-Oryzopsis hymenoides) types are rated conservatively (24-30 acres per animal unit month) when compared to ratings in other parts of the resource area (i.e. Gray Hills allotment where these types are rated at 10-20 acres per animal unit month).

Through observations it is apparent that the Basalt allotment is as productive if not more so than the Gray Hills allotment. The frequency, size, and diversity of key species is much greater. This can partly be attributed to the weather pattern (moisture) that has occurred in the area over time and that the allotment is a winter use area.

7. Ecological Status

An Order 3 soil survey has been completed in the Mina Planning Unit which encompasses the Basalt allotment. Though ecological sites were identified at the time, ecological status was not established. The ecological status for the key area established in 1985 is as follows:

<u>Key Area</u>	<u>%PNC</u>	<u>Seral Stage</u>	<u>Range Site</u>
B-1	65	Late Seral	27-9 Sandy 5-8 p.z.

8. Wildlife Habitat-Riparian/Fisheries Habitat

No key or crucial habitat is found within the allotment.

9. Wild Horse Habitat

The Montgomery Pass Herd Management Area is located primarily in the northwest portion of the allotment. By agreement, planning and management of this herd is USFS responsibility, with the Carson City District assisting in census and utilization studies. Ten percent of the Herd Area is in the allotment accounting for 168 AUMs of forage.

V. CONCLUSIONS

The objectives outlined in Section III. C. are discussed below as to being met, not met, or inadequate data available to make a determination.

A. Land Use Planning Objectives

SHORT TERM

Objective: Initially, authorize livestock use at the three year average licensed use level of 519 AUMs. There will be no initial change in the active preference.

All of the permittee's active grazing preference has been made available on a yearly basis. Actual use data and annual licensed use shows an average of 442 AUMs. The objective was met both prior to and after the National Forest and Public Lands of Nevada Enhancement Act of 1988.

Objective: Initially manage wild horses at present estimated population levels providing for approximately 48 AUMs of forage for wild horses which is the prorated demand based on an estimate of 4% of the herd area in the allotment.

No gathers have been made in the Montgomery Pass Herd Management Area since 1983. Forage is available to meet the current demand of 168 AUMs (24 wild horses from approximately October 15th to May 15th). The objective has been met.

LONG TERM

Objective: Continue rangeland and watershed monitoring to determine if we are meeting management objectives of 1) maintaining existing trend and condition recorded at key areas on key species; and 2) maintaining an acceptable allowable use level of 60% on key areas on key species.

Utilization, use pattern mapping, trend (frequency and photo plots), and ecological condition rating information has been gathered since 1985.

Frequency data collected in 1985 and 1988 utilized different frame sizes (20" for all species in 1985 versus 10" and 40" sizes in 1988). For the purpose of evaluating key species, the 1991 data was gathered utilizing 1988 frame sizes. The confidence interval used in this analysis was 95%. Results are as follows:

Indian Ricegrass	1991 1988	49.50 62.50
Fourwing Saltbush	1991 1988	18.00 23.50
Winterfat	1991 1988	14.50 21.50

There is a significant difference (decline) in the frequency of ricegrass and winterfat between 1988 and 1991. Fourwing saltbush shows no significant difference for the years compared.

In other allotments the decline of ricegrass seems to be a common occurrence. This is attributed to the drought conditions over the past five years as well as the occurrence of smut in many plant communities. There is no evidence to suspect the decline is related to livestock grazing.

It is concluded that the objective is not being met.

Use levels on key species should not exceed 60%. Based upon this target level, results are as follows for the key area:

Indian ricegrass use level was exceeded in 1990, not exceeded in 1991, 1989, 1987 and 1986.

Winterfat use level was exceeded in 1990 and 1987, not exceeded in 1991 and 1989, and not measured in 1986.

Fourwing saltbush use level was exceeded in 1990, not exceeded in 1991, 1989 and 1986, and not measured in 1987.

For the most part the use level objective of 60% is being met for all key species, although not on a consistent basis.

Use pattern mapping was completed during the spring of 1990, 1989, 1987 and 1985.

Results of use p	attern ma	apping a	ire a	as fo	SMOLIC
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USE CLASS	ACRES	PERCENTAGE
SEVERE	0	0
HEAVY	0	0
MODERATE	6761	33
LIGHT	0	0
SLIGHT	2991	15
NO USE	10653	52

1985 Use Pattern Mapping

1987 Use Pattern Mapping

USE CLASS	ACRES	PERCENTAGE
SEVERE	21	TRACE
HEAVY	277	1
MODERATE	130	1
LIGHT	736	4
SLIGHT	3654	18
NO USE	15587	76

1989 Use Pattern Mapping

USE CLASS	ACRES	PERCENTAGE
SEVERE	0	0
HEAVY	937	4
MODERATE	1344	7
LIGHT	7108	35
SLIGHT	560	3
NO USE	10456	51

1990 Use Pattern Mapping

USE CLASS	ACRES	PERCENTAGE
SEVERE	715	4
HEAVY	550	3
MODERATE	8234	40
LIGHT	0	0
SLIGHT	0	0
NO USE	10906	53

Overall, much of the allotment is not being utilized by livestock, wild horses, or wildlife due to the lack of water. The only time use is made in these areas is when snow or residual water remains in low lying areas.

Areas of heavy and severe use have been most noticeable around Hump pipeline. The northeastern portion of the allotment does not receive much use due to slope and lack of water.

Photo trend plots were photographed twice during the evaluation period (1985 and 1989). Comparison of photos substantiate the decline in vigor of plant species at the key area between 1977 and 1989. Shrubs as well as grasses exhibit the stress of the drought.

A field trip taken on 1/9/91 revealed that an abundance of forage is available throughout the allotment considering the low precipitation years. Use is predominantly moderate to light except in close proximity of the troughs.

Objective: Maintain water quality and availability on public lands in the Resource Area for all livestock, wildlife, and wild horses.

Water quality and availability have been maintained on the allotment between 10/1 and 3/31. Water for the Hump Pipeline is turned off between 4/1 and 9/30. GRAYFCO has water rights for Andy Well which supplies water to the Hump Pipeline. Although water is not being provided to wild horses and wildlife on a continuous basis, water is available consistently for the same time period each year and no apparent conflicts have arisen that have been documented.

Therefore the objective is being met for the period of time that animals utilize the allotment.

Objective: Maintain the condition of public rangelands consistent with wildlife and livestock objectives to sustain productivity and the free-roaming behavior of wild horses within the herd management areas.

Objective: Maintain the existing habitat condition of the public lands so as to sustain productivity for wildlife.

Based upon existing monitoring data and professional judgement there is no appreciable change in the condition of the public rangelands that would adversely affect wildlife, wild horses and livestock. Adequate quantity and quality of forage exists in spite of drought and some distribution problems. The allotment appears to be in good condition. Active use has consistently been below the active preference. When normal precipitation patterns and amounts return to the region, productivity and frequency of key species should once again begin to improve. The objectives are being met.

VI. Recommendations

Based upon the objectives established for the Basalt Allotment in the Land Use Plan, the use level on the key species in the vicinity of the key area and maintaining trend are objectives that are not being met. The location of the key area is in a low lying area adjacent to an existing road. Livestock tend to concentrate in this area during certain times of the grazing season in addition to trailing along the road. The combination of these two factors will naturally result in higher utilization levels that are not representative of utilization throughout the allotment. In addition changes in ecological condition and frequency of key species may not be representative of the allotment as a whole. In order to meet these objectives, the following proposals should be employed:

1. Continue to authorize 519 AUMs of cattle use between 10/01 to 03/31.

2. The majority of the allotments vegetative resource is maintaining or improving except for those areas in close proximity to existing water. In order to more fully utilize the allotment, water hauling and the placement of mineral/protein supplement is suggested. Areas of placement should be rotated so that adverse impacts to soil and vegetation can be minimized.

In addition the pipeline to the northernmost trough located on the western portion of the allotment should be repaired. This will improve livestock distribution, thereby reducing areas currently being overutilized. If at anytime monitoring data identifies problems/conflicts, appropriate changes would be implemented immediately.

- 3. A new key area should be established in the allotment in an area that is not within a wash or an area that is a natural travel route for livestock. The site will be selected with the cooperation of the permittee and other interested parties. This will provide comparative information on ecological condition and frequency of key species.
- 4. A weather station should be established within in the allotment. Data should be collected on a monthly basis. This will provide more accurate information for future evaluations. It would be beneficial if an agreement could be made with GRAYFCO to establish the station at its mining operation. This would provide a site whereby the chance of vandalism would be greatly reduced. If possible, an agreement could be entered into so that GRAYFCO personnel could record the data and provide it to the BLM.
- 5. Tentative interim objectives to be obtained at the key area by the year 2000 are as follows:

a. Maintain the forage quantity and quality.

- b. Maintain adequate grass cover for watershed protection.
- c. At a minimum maintain the frequency of Indian ricegrass and winterfat. The plant community measured in 1985 showed 47% grasses, 0% forbs, and 53% shrubs. The potential plant community is 75% grasses, 5% forbs, and 20% shrubs. The key area objective will be to manage for a Desired Plant Community (Refer to Appendix D) of 55% grasses, 2% forbs, and 43% shrubs.
- d. Incorporate fourwing saltbush as a key species for the existing key area.
- 6. The permittee will provide on a yearly basis actual use information for the allotment. Number of livestock, general area of use, and the amount of time in use areas should be detailed on the actual use report.
- 7. The acreage gained in the Land Exchange should officially be added to the allotment.
- 8. The AML for wild horses should be established at 24 head (168 AUMs) for the allotment. This is based upon monitoring information provided by *Dr. John Turner which indicates the area is used between October 15th and May 15th.
- 9. Monitor wild horses from the White Mountain herd which are beginning to utilize the Basalt allotment. Exact numbers are not known but current use appears to be insignificant. They are trailing to the water hole at the mine and then trailing out towards Miller mountain.

*Dr. Turner is working in conjunction with the Forest Service, Inyo National Forest at Lee Vining, California. He is gathering information on the wild horse population, herd movement, and predation by mountain lion within the Montgomery Pass Herd Management Area.

VII. Consultation

The evaluation is being sent to affected interests for comment/review. Input received will be incorporated into the Proposed Multiple Use Decision for the Basalt allotment. APPENDIX A

MAP	NO.	1	LAND STATUS
MAP	NO.	2	USE PATTERN MAPPING - 1990
MAP	NO.	3	USE PATTERN MAPPING - 1989
MAP	NO.	4	USE PATTERN MAPPING - 1987
MAP	NO.	5	USE PATTERN MAPPING - 1985
MAP	NO.	6	EXISTING RANGE IMPROVEMENTS
MAP	NO.	7	MONTGOMERY PASS HERD MANAGEMENT AREA
MAP	NO.	8	KEY AREA / PHOTO TREND PLOT LOCATIONS

APPROXIMATE SCALE

.6 INCHES = 1 MILE



MAP NO. 2 - USE PATTERN MAPPING



MAP NO.3 - USE PATTERN MAPPING



MAP NO.4 - USE PATTERN MAPPING



MAP NO.5 - USE PATTERN MAPPING



MAP NO. 6 - EXISTING IMPROVEMENTS





MAP NO. 7 - HERD MANAGEMENT AREA

MAP NO. O KEY AREA / PHOTO TREND



APPENDIX B

TABLE 1 AVERAGE PHENOLOGY OF KEY PLANT SPECIES - BASALT ALLOTMENT

TABLE 1. AVERAGE PHENOLOGY OF KEY PLANT SPECIES - BASALT ALLOTMENT MONTHS J F M A M J JU A S O N D SPECIES FOURWING SALTBUSH

WINTERFAT

INDIAN RICEGRASS

				111	I	

SYMBOL	S	SHRUBS			GRASSES	
	I J F S I	LEAF GR IWIG GR FULL BL SEED DI LEAVES	ROWTH ROWTH LOOM SSEMI DRY/I	NATION DROP	GROWTH S FLOWER S ANTHESIS SEED DIS PLANTS D	STARTS STALKS APPEAR S SSEMINATION DRY
Fourwing Saltbush	A (<u>Atriplex c</u>	canesce	ens)	Leaf Growth Twig Growth Leaves Dry/Dro Full Bloom Seed Dissemina	op ation	March-May May-June June Sept.
Winterfat (<u>Euroti</u>	<u>a lanata</u>)			Leaf Growth Twig Growth Full Bloom Seed Dissemina Leaves Dry/Dro	ation op	March-April April-May June July-August SeptOct.
Indian Ricegrass	(<u>Oryzopsis h</u>	nymenoi	<u>des</u>)	Growth Starts Flower Stalks Anthesis Seed Dissemina Plants Dry	Appear	March-April May June July July-August

APPENDIX C

KEY MANAGEMENT AREA EVALUATION SUMMARY



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APPENDIX D

LIST OF EXISTING RANGE IMPROVMENTS DESIRED PLANT COMMUNITY - DPC

RANGE IMPROVMENTS - BASALT ALLOTMENT

JOB COMP. MAINT. RESP. TOWN. RNG. SEC. SUB. YR. NUMBER NAME 33E 27 SENW 544163 ANDY WELL 1971 PERMITTEE 2N 28 SENE HUMP PIPELINE PERMITTEE 2N 33E 545087 1962

Damage the Hump Pipeline occurred due to the extreme cold weather during the month of December, 1991. Repairs on the pipeline should be made as soon as possible.

APPENDIX D

DESIRED PLANT COMMUNITY

Information presented here concerning the Desired Plant Community concept is contained in Bureau Handbook 1621-1-Vegetation Management. This handbook is in <u>DRAFT</u> form only. This is not an **official publication**. This section of the evaluation is to give the reader an idea of the concept.

The definition of a Desired Plant Community is the plant community which provides the vegetation characteristics required for meeting or exceeding Resource Management Plan vegetation objectives. The DPC must be within an ecological site's capability to produce these characteristics through natural succession, management action, or both.

A DPC must:

- be within the potential of the site.
- be measurable and be related to a specific location.
- be achievable within an indicated time frame.
- not normally result in irreversible site degradation.
- determined and monitored by an interdisciplinary team.

The Bureau's Ecological Site Inventory (ESI) provides baseline vegetation information.

Objectives should contain the following:

-describe the present situation.

-determine the desired situation.

-determine the time required to go from the present to the desired.

-make certain objective is not in conflict with other objectives.

-state the rationale for the desired situation.

-determine the actions required to achieve the desired situation.

-identify how to monitor effects of management actions with respect to achieving resource objectives.

BOB MILLER Governor

STATE OF NEVADA

CATHERINE BARCOMB **Executive Director**

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COMMISSION FOR THE PRESERVATION OF WILD HORSES

Stewart Facility Capitol Complex Carson City, Nevada 89710 (702) 687-5589

September 2, 1992

John Matthiessen, Area Manager Walker Resource Area BLM-Carson City District Office 1535 Hot Springs Rd., Ste. 300 Carson City, Nevada 89706-0638

Dear Mr. Matthiessen,

Thank you for the opportunity to review and comment on the Basalt Allotment Evaluation.

It appears that the system presently in hand is working for the benefit of all users.

It also appears that water is the limiting factor for usage of the entire allotment by either wild horses, wildlife, or livestock, and that those site specific areas are the most heavily damaged. We would recommend the District investigate the feasibility of water catchments or other methods of distribution by water availability.

Again, thank you for the opportunity to comment on this evaluation.

Sincerely,

acout

CATHERINE BARCOMB Executive Director





WILD HORSE ORGANIZED ASSISTANCE P.O. BOX 555 RENO, NEVADA 89504 (702) 851-4817

BOARD OF TRUSTEES

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In Memoriam LOUISE C. HARRISON VELMA B. JOHNSTON, "Wild Horse Annie" GERTRUDE BRONN

September 2, 1992

John Matthiessen, Area Manager Walker Resource Area BLM-Carson City District Office 1535 Hot Springs Rd., Ste. 300 Carson City, Nevada 89706-0638

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Sincerely,

DAWN Y. LAPPIN Director