



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Ely District Office
HC 33 Box 33500
Ely, Nevada 89301-9408



IN REPLY REFER TO:

4403.3 (NV-047)

OCT 16 1992

Dear Reader:

Enclosed for your information is the Management Action Selection Report for the Wells Station Allotment. This report is the final section of the allotment evaluation, and completes the monitoring evaluation process.

The Management Action Selection Report addresses the primary concerns received from involved interests, lists the options considered during the evaluation, and identifies the management actions selected. The report also describes the rationale as to why those actions were selected.

This report is provided for your information only, and will be followed at a later date by a proposed multiple-use decision if indicated in the report. This decision will be issued to actually initiate the chosen actions on the ground, and will specify the procedures for protest and appeal. A copy of the decision will be provided to those individuals and/or organizations that have participated in the monitoring evaluation process. If no decision is required, the Management Action Selection Report will serve as documentation to the grazing file that current management is appropriate.

Sincerely,

Gene L. Drais, Manager
Egan Resource Area

1 Enclosure

1. Wells Station Allotment Section 8 Report

MANAGEMENT ACTION SELECTION REPORT
WELLS STATION ALLOTMENT
EGAN RESOURCE AREA
Steve Carter, Permittee

A. INTRODUCTION

The Wells Station Allotment evaluation was conducted in accordance with the direction set forth in Washington Office Instruction Memorandum No. 86-706 and is based on monitoring data collected in 1988, 1989, and 1991.

A limited amount of public comment was received pertaining to this allotment evaluation. Copies of the comment letters that specifically address this allotment can be found in the Wells Station Allotment Evaluation file located in the Ely District. All allotment-specific comments were considered for incorporation into the final evaluation. Some of the primary concerns expressed for Wells Station are addressed as follows:

In a letter received at the Ely BLM office on June 24, 1992, the owners and family members of the Carter Griffin Inc./Carter Cattle Co. discussed several concerns about the Wells Station Evaluation. Of the several concerns discussed in their response letter, the BLM will address four: 1) percentage increase of wild horses; 2) the White River Wild Horse Herd appropriate management level (AML); 3) reductions based on short term utilization levels; 4) long term monitoring and trend.

The wild horse use from 0 AUMs in 1989 to 204 AUMs in 1991 is not a 200% plus increase as stated in the letter. The wild horses are not being given a 200% plus increase. The fact is that the March 15, 1991 census showed 17 wild horses in this allotment and use is occurring yearlong which equates to 204 AUMs. "Wild horses will be managed at 20 animals within the White River Herd Management Area (HMA)." (Egan ROD, p.6) These 20 wild horses as well as the 67 AUMs (6 horses yearlong) identified, in the RPS are no longer valid AMLs. The BLM agrees that the White River wild horse herd has substantially exceeded the old AML set at 20 wild horses for the HMA or 6 horses yearlong (67 AUMs) for the allotment.

The BLM is mandated to take appropriate management action as the monitoring data shows. The proposed wild horse and cattle reduction for the Wells Station Allotment is based on the most recent utilization data. Utilization studies showed significant heavy use in 1988, 1989, and 1991. This short term utilization monitoring is valid in determining appropriate stocking levels. A reduction in the stocking rate is warranted when short term utilization levels are significant. In addition, the BLM agrees that long term monitoring is essential to show whether utilization, ecological conditions, and trend objectives are being met or not met.

However, a statement in the Carter Griffin Inc. response letter argues that long term monitoring is intended to measure just trend. Trend is not necessary to set stocking levels based on utilization studies. Trend is not a direct measurement, but will show over time that chronic over-utilization is causing unfavorable changes in plant community composition (downward trend). Ecological status (condition) studies will show what the decline in vegetative composition is. Trend and condition are long term studies that will also be considered during reevaluations in the future. Trend is not necessary to justify changes in stocking levels, although it is useful to confirm that a stocking level needs changing. In fact, if trend (and ecological condition) is down or deteriorating, vegetative changes are already taking place, changes which may be more difficult to reverse. Over-utilization leads to poorer ecological condition and thus trend; a fact that has been established repeatedly in range research, and is the basis for allowable use levels used in the evaluation. This relationship between over-utilization and vegetative changes does not need to be proven over and over on an allotment basis. Livestock adjustments presented in the evaluation for Wells Station are designed to prevent over-utilization and subsequent declining ecological status (condition).

Resource Concepts Inc. (RCI) commented on the amount of suspended AUMs attached to the Wells Station Allotment. Although the suspended AUMs were not mentioned in the evaluation, the BLM recognizes that the Preston - Lund Grazing Adjudication Agreement of 1966 included a 70 percent reduction for all permittees of the South Group. Therefore, the current active preference is 312 AUMs with a suspension of 674 AUMs. Previous existing suspensions have nothing to do with the current evaluation.

A comment letter was received from the U.S. Fish and Wildlife Service listing the threatened and endangered species as well as the candidate species pursuant to section 7(c) of the Endangered Species Act of 1973 that may occur in the Wells Station Allotment. No threatened and endangered species were listed for this allotment. However, candidate species listed include the pygmy rabbit, spotted bat, ferruginous hawk, and the loggerhead shrike. Actions proposed in the Wells Station Allotment Evaluation Summary are not likely to adversely affect any of the listed species nor the continued existence of the listed species or result in the destruction or adverse modification of critical habitat.

The Nevada Department of Wildlife (NDOW) response letter indicated agreement with the management evaluation and conclusions reached for the Wells Station Allotment. However, they have a concern that no period of use is stated in the recommendations. The current period of use is from November 1 to May 1. The BLM recommends the period of use remain the same. In addition, NDOW recommended that

no use on winterfat extend past March 31. Historically, the permittee has rarely grazed his cattle on this allotment past NDOWs recommended date.

Conclusions of the evaluation were based upon data collected from the following sources:

1. Range, wild horse, wildlife, and other studies files compiled by the Egan Resource Area and Division of Resources of the Ely District, BLM.
2. Input from Carter Griffin Inc./Carter Cattle Company in a letter dated June 22, 1992.
3. Input from the N-4 Grazing Board, via a letter from RCI, dated June 12, 1992.
4. Input from NDOW, Region II, in a letter dated June 15, 1992.
5. A letter and a list of candidate species from the U. S. Fish and Wildlife Service dated June 29, 1992.

B. ANALYSIS OF MONITORING DATA

Based on the identified issues of the evaluation, 1 of the land use plan objectives are being met and 3 are not being met with current management practices. Therefore, additional management actions and/or adjustments in use are necessary. Overutilization has occurred on an average of 16% of the allotment used by cattle and wild horses. Although current ecological condition is acceptable, continued overuse over time will result in a decline in vegetative vigor and ultimately lowered ecological condition.

C. SUMMARY OF MANAGEMENT OPTIONS

- Option 1 Reduce cattle active preference from 312 AUMs to 258 AUMs, 728 AUMs suspended (674 AUMs previously in suspension +54 AUMs suspended in current evaluation) and establish a wild horse AML at 168 AUMs (14 horses yearlong) for that portion of the White River HMA within the Wells Station Allotment.

D. Selected Management Action

The selected management action is as follows:

The active cattle preference will be reduced from the current active preference of 312 AUMs to 258 AUMs, with 54 AUMs suspended non use, a 17% reduction. The total suspended non use will be 728 AUMs. Total preference (active and suspended) remains the same at 986 AUMs.

Wild Horse AML will be established at 168 AUMs (14 horses year-long) for that portion of the White River HMA within the Wells Station Allotment.

Rationale:

The desired stocking level on the allotment is based on 50% desired utilization, with winter/spring use. This calculation results from actual use and measured utilization data, and indicates that a reduction of livestock to 258 AUMs and setting the wild horse AML at 168 AUMs is necessary to meet the desired utilization level and to maintain a thriving natural ecological balance and prevent deterioration of the rangeland.

Use pattern mapping indicates a distribution problem on native range used by both wild horses and cattle. These problems will be mitigated by a reduction in wild horse use by establishing the AML at 168 AUMs and a redistribution of cattle and permit stipulations including water hauling and herding.

E. Grazing Adjustments

Reductions in cattle preference will be phased in over 5 years as follows:

<u>Year</u>	<u>Number</u>	<u>Kind</u>	<u>Period of use</u>	<u>Total</u>	<u>AUMs</u> <u>Active</u>	<u>Suspended</u>
1	49	Cattle	11/1 - 5/1	986	294	692
3	46	Cattle	11/1 - 5/1	986	276	710
5	43	Cattle	11/1 - 5/1	986	258	728

Year 1 for this schedule is considered to be in 1992, starting 11/1.

Adjustments in wild horse numbers to the established AML of 14, a 17% reduction from existing numbers, will be made by future White River Herd Area gathers based on continued monitoring.

F. FUTURE MONITORING AND GRAZING ADJUSTMENTS

The Egan Resource Area will continue to monitor the allotment. The monitoring data will provide necessary information for subsequent re-evaluations in the third and fifth years. These re-evaluations are necessary to determine if the allotment objectives are being met under the new or adjusted grazing management. In addition, these subsequent evaluations will determine if continued or additional adjustments are needed to meet the allotment objectives. Use pattern mapping and/or utilization spot checks (key area utilization) will be performed every 1-2 years. Actual use will continue to be collected from the permittee and wildlife use estimates from the NDOW. Ecological site inventory based on the

completed third order soil survey with related ecological site information will be completed as funding allows. Wild horse aerial census will continue every 1-3 years, as funding allows.