



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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

✓ a: moorman, SR 4-897
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TAKE
PRIDE IN
AMERICA

IN REPLY REFER TO:

4403.3(NV-047)

APR 8 1997

Dear Participant:

Enclosed for your information is the Management Action Selection Report (MASR) for the Moorman Ranch Allotment. This report is the final section of the allotment evaluation and completes the monitoring evaluation process.

The MASR 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.

The MASR is provided for your information only and will most likely be followed at a later date by a Proposed Multiple Use Decision. The 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.

Sincerely,

Fred Fisher, Acting

Hal M. Bybee, ADM
Renewable Resources

Enclosure

1. Moorman Ranch Allotment (MASR)

MANAGEMENT ACTION SELECTION REPORT
MOORMAN RANCH ALLOTMENT
ELY DISTRICT
Bob Dickenson, Permittee

A. INTRODUCTION

The Moorman Ranch Allotment evaluation was conducted in accordance with the direction set forth in the Washington Office Instruction Memorandum No. 86-706 and is based on monitoring data collected in 1988, 1989, 1990, 1991 and 1992.

Comment letters were received from the Nevada Division of Wildlife (NDOW), Bob Dickenson, Wild Horse Organized Assistance (WHOA), Resource Concepts Incorporated (RCI) and the Commission for the Preservation of Wild Horses. Copies of the comment letters that specifically address this allotment can be found in the Moorman Ranch Allotment Evaluation file located in the Ely District Office. All allotment specific comments were considered for incorporation into this management action selection report.

RCI listed concerns in their response letter received March 16, 1994. These concerns have been presented to the BLM numerous times and are as follows: 1) Basing long term management decisions almost exclusively on short term monitoring data. 2) Use of the Sneva Crop Yield Index to normalize precipitation data. 3) Use of the Stocking Rate Formula to calculate active preference. 4) Problems with utilization monitoring techniques, data and analysis.

NDOW expressed concern that key species representative of riparian areas needed to be used in order to determine whether the Rangeland Program Summary (RPS) objectives are being met or not. Riparian objectives are measured in the Ely District by using an offbank stream-riparian condition worksheet. Condition is based upon composition of individual riparian areas (presence of key riparian species) and percent cover. They also expressed concern that there were no specific key areas established for monitoring key wildlife habitat areas. There are three wildlife habitat studies located on the Moorman Ranch Allotment. Locations and condition of these studies are identified beginning on page 13 in the allotment evaluation.

NDOW also felt that several important springs were not included in the evaluation and should be included. Specifically listed were Pond Spring, Prune Spring and Indian Spring. As a result of this information, Prune Spring and Indian Spring will be added to the evaluation. Pond Spring is privately held and therefore is not included in BLM monitoring. Information regarding the 1987 General Aquatic Wildlife Survey (GAWS) stream survey conducted by NDOW will also be added to the evaluation.

Under VII. Technical Recommendations, page 4, of NDOW's response, they mention that there is only a 5% reduction from actual use in the Antelope/Divide Use Area. It is BLM policy that reductions be made in livestock numbers from permitted use and not actual use. They also expressed concerns over season of use in the Buster Mountain and Antelope/Divide Use Areas based upon overutilization of key browse species by livestock.

WHOA and the Commission expressed disagreement in the reductions between livestock and wild horses. As stated above it is BLM policy that reductions be made in livestock numbers from permitted use (authorized use) and not actual use. 43 CFR 4110.3-2(b) states in part "When monitoring or field observations shows grazing use or patterns of use are not consistent with the provisions of subpart 4180, or grazing use is otherwise causing an unacceptable level or pattern of utilizationthe authorized officer shall reduce permitted use grazing use or otherwise modify management practices". They also disagreed with the use of the Sneva Crop Yield Index which is used to address changes in weather patterns and how that affects vegetation growth. The BLM's use of this index has been affirmed numerous times by Administrative Law Judges and the Interior Board of Land Appeals. #5

As a result of a field trip with affected interests (NDOW) on May 6, 1994, one addition will be added to the Long Term Technical Recommendations section of the evaluation. The addition will be to fence a section of Illipah Creek located south of the reservoir to the Forest Service boundary. NDOW also wanted to fence a mesic meadow along Unnamed Illipah Creek; however, this area is privately held and the BLM has no authority. Also as a result of additional information provided by the NDOW and recent literature searches, the use period of the Buster Mountain unit will be changed to 6/15 through 9/2, with use to 10/14 one out of every four years. Studies consistently show that as herbaceous forage begins to mature and subsequently lose moisture, cattle will shift to browse species, specifically bitterbrush. This dietary overlap can result in overuse of key browse species, evidenced by the presence of dead plants and severely hedged plants. Key areas established for wildlife and livestock on Buster Mountain indicate that these conditions are prevalent in the use area, which could be a result of extended drought conditions as well as consistent overuse by livestock.

On May 1, 1996 a meeting was held with affected interests (NDOW, U.S. Forest Service and the permittee Bob Dickinsons' representative Jack Neal (Manager for the Moorman Ranch Allotment) to discuss implementing a rotation system between the Forest Service allotments and the Buster Mountain and Illipah Seeding Use Areas of the Moorman Ranch Allotment. NDOW had concerns both with the season of use of the browse on Buster Mountain as well as the season of use in both the Forest Service Units and the BLM use area located along Illipah Creek. As a result of the meeting, a four year rotation system was established between the Forest Service and the BLM Allotments which limited late use on the browse within Buster Mountain and alternated early and late use on the riparian area along Illipah Creek.

An additional meeting was held on February 6, 1997 with Bob Dickenson, Jack Neal and BLM personnel to discuss the allotment evaluation. As a result of this meeting, a subsequent meeting was held on February 25, 1997 with Jack Neal, who Bob Dickenson stated would be representing his interest in the Moorman Ranch in regard to the allotment evaluation. From that meeting additional AUMs were allocated for livestock grazing in the Antelope/Divide and East Jakes Use Areas. This was based on the concern that the two use areas were underadjudicated for livestock grazing, based on water hauling practices that have been implemented since the evaluation. These additional AUMs will only be available as a result of specific stipulations in regard to the number and location of the water haul sites.

In addition to the above comments, an error was made on page 10 under Table 5, which illustrates use pattern mapping for Long Valley by acre. The year should begin with 1991 instead of 1992. Also under trend on page 12 an error was made in evaluating the frequency trend data for the key areas. Instead of an upward trend at key area MR-1 and MR-6, there would be a static trend with no significant increase of EULA or ORHY at the 95% confidence interval, and instead of a downward trend for key area MR-5, there would be a static trend with no significant decrease in ORHY.

B. ANALYSIS OF MONITORING DATA

Based on the identified issues of the evaluation, eleven of the fourteen land use plan objectives are not being met with current management practices. Therefore, additional management actions and/or adjustments in livestock and wild horse use are necessary. The current problem on the allotment is overutilization of native perennial grasses and winterfat by wild horses and cattle. Utilization of key browse species by cattle has exceeded allowable limits on mule deer fall/winter ranges.

C. SELECTED MANAGEMENT ACTION

The selected management action is outlined as follows:

a. Long Valley Use Area

The stocking rate will be set at 1366 AUMs for cattle and 174 AUMs for wild horses. Livestock use will be limited to the winter use period (10/15 - 4/15). Adherence to the spring removal of livestock in this area will be stressed. No salt or supplements will be allowed within 1/2 mile of live waters or in winterfat vegetation.

b. West Jake Use Area

The stocking rate will be set at 644 AUMs for cattle. Livestock use will be limited to the fall/winter use period (9/1 - 4/15). No salt or supplements will be allowed within 1/2 mile of live waters or in winterfat vegetation.

c. Illipah Seeding

The stocking rate will be set at 125 AUMs for cattle. A four year rotation system will be established in conjunction with the permittees' Forest Service allotments. The seasons of use are outlined below:

<u>Year</u>	<u>Season of Use</u>
1	9/30 - 10/14
2	6/16 - 6/30
3	7/11 - 7/25
4	8/22 - 9/05

d. East Jake Use Area

The stocking rate will be set at 300 AUMs for cattle based on water hauling or 147 AUMs if water hauling is not utilized. Full use of the 300 AUMs will be based on the establishment of two water haul sites. One will be located at Townsend Well (Dry), T 18N, R 60E, Sec., 10 and the other will be located south of Highway 50 in the vicinity of T 18N, R 60E, Sec. 14. The specific locations will be agreed upon by the Rangeland Management Specialist and permittee. Livestock use will be limited to the summer/fall use period (5/16 - 10/15). Livestock use will either start in the west portion of the East Jakes Use Area and proceed east, shutting off waters as livestock are moved; or start in the east and proceed west shutting off waters as livestock are moved.

e. Buster Mountain Use Area

The stocking rate will be set at 394 AUMs for cattle. A four year rotation system will be established in conjunction with the permittee's Forest Service allotments. The seasons of use are outlined below:

<u>Year</u>	<u>Season of Use</u>
1	6/16 - 7/24
2	7/01 - 8/08
3	7/26 - 9/2
4	9/06 - 10/14*

* If monitoring shows that objectives are not being met by the fourth year, the permittee will reduce numbers of AUMs based on available monitoring data as the authorized officer directs, to reduce impacts of late use.

Establish the wild horse AML at 0 AUMs, since wild horses from the Monte Cristo HMA only make incidental use of this area.

f. Antelope/Divide Use Area

The stocking rate will be set at 600 AUMs for cattle based on water hauling or 492 AUMs if water hauling is not utilized. Full use of the 600 AUMs will be based on the following stipulations:

- 1) Water will either be hauled to T 19N, R 58E, Sec. 33 NESW or pumped from the existing well (at the same location) by the mine, as in the past.
- 2) Water will either be available in the stock pond located at T 18N, R58E, Sec. 11 NWNW or will be hauled to a suitable location to be decided by the Rangeland Management Specialist and permittee in the northern portion of the Divide Use Area.

Livestock use will be limited to the summer/fall use period (5/16 - 10/15). Livestock will be distributed between waters in the northern and southern portions of the Divide Use Area and then herded into the northern portion of the Antelope Use Area and south. Gates will be closed to exclude livestock from the Divide Use Area once they have been moved into the Antelope Use Area. The wild horse AML will be set at 31 AUMs.

g. Burned Basin Use Area

The stocking rate will be set at 148 AUMs for cattle and 11 AUMs for wild horses. Livestock use will be limited to the fall/winter use period (9/1 - 4/15).

h. Trench Use Area

The stocking rate will be set at 183 AUMs for cattle and 20 AUMs for wild horses. Livestock use will be limited to the summer/fall use period (5/16 - 10/15).

i. Townsend Seeding

The stocking rate will be set at 477 AUMs for cattle. Livestock use will be limited to (5/1 - 6/15) and (9/1 - 10/31) or (3/1 - 6/15). See attached Map 6.

j. East Jake Seeding

The stocking rate will be set at 169 AUMs for cattle. Livestock use will be limited to (5/1 - 6/15) and (9/1 - 10/31) or (3/1 - 6/15). See attached Map 6.

k. Moorman Ranch Seeding

The stocking rate will be set at 343 AUMs for cattle. Livestock use will be limited to (5/1 - 6/15) and (9/1 - 10/31) or (3/1 - 6/15). See attached Map 6.

1. General (all pastures)

Total authorized use for livestock on the Moorman Ranch Allotment for Bob Dickenson would be 4749 AUMs licensed separately for the eleven use areas outlined in previous sections. Authorized use and wild horse AUMs for each of the use areas is summarized as follows:

<u>Use Area</u>	<u>Cattle AUMs</u>	<u>Wild Horse AUMs</u>
Long Valley	1366	174 (Buck & Bald HMA)
West Jake	644	0 (Not Applicable)
Antelope/Divide	600	31 (Buck & Bald HMA)
Trench	183	20 (Buck & Bald HMA)
Burned Basin	148	11 (Buck & Bald HMA)
Townsend Seeding	477	0 (Not applicable)
M. Ranch Seeding	343	0 (Not applicable)
Illipah Seeding	125	0 (Not applicable)
East Jake	300	0 (Not applicable)
East Jake Seeding	169	0 (Not applicable)
Buster Mountain	394	0 (Monte Cristo HMA)
Total	4749	236 (Buck & Bald HMA) 0 (Monte Cristo HMA)

D. GRAZING ADJUSTMENTS

Changes in authorized use will be phased in over five years, in roughly equal increments as follows, with AUMs removed from active use to be held in suspension:

Cattle (Authorized Use):

<u>Use Area</u>	<u>Year 1</u>	<u>Year 3</u>	<u>Year 5</u>
Long Valley	2701	2033	1366
West Jake	958	801	644
Antelope/Divide	600	600	600
Trench	394	289	183
Burned Basin	525	337	148
Townsend Seeding	477	477	477
M. Ranch Seeding	343	343	343
Illipah Seeding	125	125	125
East Jake	300	300	300
East Jake Seeding	169	169	169
Buster Mountain	<u>885</u>	<u>640</u>	<u>394</u>
	7477	6114	4749

Wild horse AMLs for the Moorman Ranch Allotment are summarized as follows:

<u>Use Area</u>	<u>Herd Mgmt. Area</u>	<u># of Animals</u>	<u>AUMs</u>
Long Valley	Buck & Bald	35/ 5 mos.	174
Antelope/Divide	Buck & Bald	4/ 7 mos.	31
Trench	Buck & Bald	3/ 7 mos.	20
Burned Basin	Buck & Bald	2/ 7 mos.	<u>11</u>
			236
Buster Mountain	Monte Cristo	0 yearlong	0

Rationale:

The desired stocking level on the seedings is based on 60% desired utilization, with spring/summer/fall use in a deferred grazing system. Stocking rates for native pastures use 50% utilization on perennial grasses as allowable use. These calculations, resulting from actual use and measured utilization data, indicate that reductions in the Long Valley, West Jake, Antelope/Divide, Trench, Burned Basin and Buster Mountain Use Areas are necessary to meet the desired utilization level. The East Jake Seeding, Moorman Ranch Seeding, Townsend Seeding and Illipah Seeding were adjudicated during the evaluation process.

E. FUTURE MONITORING AND GRAZING ADJUSTMENTS

The Ely District will continue to monitor all existing studies and establish additional studies as identified in Section VII of the Allotment Evaluation. This monitoring data will continue to be collected in the future to provide necessary information for subsequent re-evaluations in the third and fifth years following the decision. These re-evaluations are necessary to determine if the allotment objectives are being met under the new grazing management strategies. In addition, these subsequent evaluations will determine if continued or additional adjustments are needed to meet allotment objectives.



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

1105 Terminal Way
Suite 209

Reno, Nevada 89502
(702) 688-2626

April 16, 1997

Mr. Gene A. Kolkman
Ely District
Bureau of Land Management
HC 33 Box 33500
Ely, Nevada 89301-9408

Subject: Moorman Ranch Allotment - Monte Cristo HMA

Dear Mr. Kolkman:

The Commission for the Preservation of Wild Horses has received and reviewed the Management Action Selection Report for Moorman Ranch Allotment. We fail to find our concerns adequately addressed or any options presented for management selections.

As a participant to the Ely District's team to evaluate your decision making processes, we observed common agreement that these documents should present options for the selection of management decisions. Your responses to our concerns, and as well as Resource Concepts, could have included carrying capacity options based upon procedural choices within your policies.

Your determination that "paper cow" versus "actual use" adjustments are based upon policy is unfounded. Simply from our observation that other District's uniformly use this option when face with no other management alternative.

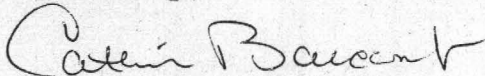
Implementation of livestock adjustments over five years may be contrary to federal regulations limiting all authorizations within rangeland carrying capacity. The fact that wild horses cannot be adjusted to the appropriate management level, contributes to this your dilemma.

Mr. Gene Kolkman
April 16, 1997
Page 2

Gene, we participated in a recent meeting discussing the content and structure of your multiple use decision making processes in Eureka on March 13, 1997. It was apparent that affected interests deserved more attention in an efficient manner from the District. This selective management report should serve as the example where input was put aside and issues between affected parties left unresolved. Please provide Mr. Tucker the opportunity to investigate this situation and report to the working group.

P.S. Please note new address.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb". The signature is written in dark ink and is positioned above the typed name.

CATHERINE BARCOMB
Executive Director



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Executive Director