

6/30/89



United States Department of the Interior
(BUREAU OF LAND MANAGEMENT)
ELY DISTRICT OFFICE
Star Route 5, Box 1
Ely, Nevada, 89301



IN REPLY REFER TO:

1784.3
(NV-046)

JUN 30 1989

Dear Participant:

We appreciate your interest in being involved in the consultation process and enclosed for your information and review is the Tippet Allotment Monitoring Evaluation. This is your opportunity again to provide allotment specific information and also to provide comments to the evaluation. We would appreciate receiving your information and/or comments by July 31, 1989, to allow adequate time to review all input and to adhere to our deadlines. All of the information received will be evaluated and considered in the final portion of the evaluation which is the selection of a management action.

We appreciate your participation and solicit your continued involvement in the consultation process.

Sincerely,

Acting Gerald M. Smith, Manager
Schell Resource Area

- 1 Enclosure
- 1. Tippet Evaluation (49 pp)

JUN 29 1989

Schell Resource Area
Tippett Allotment (0106)
Evaluation Summary

I. Background Information

The Tippett Allotments nearest point is located 45 miles north from Ely and is entirely in White Pine County. There are 200,041 federal acres in the allotment, one fenced seeding, 5 unfenced chainings, and approximately one third of the allotment is dense P-J. The allotment reflects extremes in climate, geography, distribution of forage users, and topography. It contains three major mountain ranges and two major valleys. The allotment lies adjacent to the Goshute Indian Reservation, Humboldt Forest, Egan R.A., and the Utah Stateline, and is within the Antelope Horse Herd boundaries. Besides horses, significant populations of Mule deer, Antelope, and sage grouse also use the allotment.

The livestock preference is 13,615 AUMS (7,665 AUMS sheep, 5,950 cattle) and currently there are two authorized operators (John Phillips 2,865 sheep AUMS, and Hank Vogler 4,800 sheep AUMS, and 5,950 cattle AUMS). Since 1978 when the historic user (Henriod family) sold out there have been 10 different operators run livestock in the allotment. This constant turnover created a relatively unstable situation and several of these operators had little regard for the resource values. Unauthorized use was probably quite significant during the 1981-85 period and although several trespass actions resulted in settlements, they appear to have fallen considerably short of reflecting the true picture. However, during the past year the two new permittees have exemplified a spirit of cooperation and positive concern for the allotment resource. The season of use is currently yearlong.

Utilization data has been spotty in the allotment over the years. Severe use has been documented several times at numerous locations and distribution is known to be a significant problem in the allotment. There are 17 Key Areas established in the allotment according to the Nevada Rangelands Task Force minimums, and the 3C's were used in all. There is no completed soil survey inventory, thus, no ecological status completed in the allotment. The allotment is in the "I" category and has an AMP proposed for it. Most of the Key Areas had utilization data collected and the entire allotment was use mapped in 1985. Second year trend data was also collected at most of the Key Areas in 1986.

Wildlife LUP Decisions Relative to Tippet
Management Objectives

General Management Objectives

1. Manage for the most appropriate seral stages to provide desired quantity, quality, variety and density of forage in order to meet the requirements of the key foraging animals. The priority of uses will be established by the consensus of the livestock operators, horse and wildlife interest groups, and BLM personnel. Ecological condition trends toward or away from desired seral stages will be measured on the management areas.

EIS - #1 HMP - #1 MFP - 3 - #WL - 1.8, 2.1, 2.11
6.13, 6.14, 2.5 ROD - #6

2. Provide sufficient forage and water resources to sustain preference levels of livestock, reasonable numbers of wildlife, and the management level of horses as determined in the Antelope HMAP, or provide for a sustainable level of use as close to these levels as possible.

EIS - #2 HMP - #2 MFP - 3 - #WL - 2.1, 1.7, 1.8
3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 8.2 ROD - #1, 3, 5, 6

3. Reduce livestock losses to poisonous plants.

4. Provide yearlong habitat and forage for reasonable numbers of mule deer. Minimize the impact of livestock grazing on mule deer use areas. (See Antelope HMP for mule deer numbers.)

EIS - #2 HMP - #4 MFP - 3 - 1.8, 6.1
6.10, 6.13, 7.1, 7.2, 9.1 ROD - #6

5. Provide yearlong habitat and forage for reasonable numbers of antelope. Minimize the impacts of livestock grazing on documented key antelope use areas. (See Antelope HMP for antelope numbers.)

EIS - #2 HMP - #5 MFP - 3 - 1.8, 2.11
6.2, 6.11, 7.3, 7.4, ROD - #6

6. Protect raptor nesting habitat and provide and protect habitat for raptor prey species.

EIS - #2 HMP - #6 MFP - 3 - 6.5, 6.6
8.2 ROD - #2,8

7. Provide nesting, brooding and wintering habitat for upland game species (sage grouse, blue grouse, chukar partridge and Hungarian partridge). Minimize the impacts of livestock grazing on sage grouse strutting/nesting grounds.

EIS - #2 HMP - #7 MFP - 3 - 2.6, 6.3
6.4, 6.12, 6.15, 9.4 ROD - #8

8. Manage riparian areas for late seral stage or appropriate stage for a specific use.

EIS - #3 HMP - #9 MFP - 3 - 2.7, 2.10
5.1, 5.3, 6.9 ROD - #10

9. Maintain the wild free-roaming characteristics of the horses in the area.

10. If additional forage is available after livestock numbers reach preference levels, and reasonable wildlife numbers have been reached, all available forage will be divided proportionately among all foraging animals based on animal numbers and forage preference.

If, after all plans are fully implemented and monitoring data shows reductions of animal numbers are necessary, reductions will be made in the following manner:

- a. Where a foraging animal can be identified as the primary agent causing forage resource damage in a specific area, reductions will be made from the numbers of this particular foraging animal. This foraging animal will be determined from monitoring studies, utilization, actual use, sightings, counts, etc.
- b. Where a single offending foraging animal cannot be determined in a problem area, reductions will be made proportionately according to forage preference. Whether this action will be a specific number in a specific area or an overall reduction in numbers will be determined by the circumstance involved.

EIS - #2 HMP - #11 MFP - 3 - 1.8, 2.1

Tippett Allotment
OBJECTIVES

LUP - EIS

- 1) Manage the vegetation resource and its uses to attain utilization rates not to exceed those recommended by the Nevada Rangeland Monitoring Task Force for sustained yield (45% for shrubs, 55% for grasses and forbs).
- 2) Attain and maintain habitat for reasonable numbers of wildlife, reestablish bighorn, proghorn antelope, and elk on historic ranges, and protect crucial wildlife habitat.
- 3) Upgrade and maintain all riparian and wetland areas in good or better condition.
- 4) Maximize livestock based on sustained yield of the forage resource.
- 5) Maximize wild horse numbers based on sustained yield of the forage resource.

LUP - MFP III

- 1) Increase for production and improve range condition by implementing AMP's where feasible, on the following allotment: ... Tippett....
- 2) Seedings are to be implemented within the general areas shown on MFP I overlays in the following priority:
 - 1) In areas where competition exists among livestock, wildlife, and wild horses.
 - 2) In areas in poor condition w/downward trend.
 - 3) To maintain livestock, wildlife, and wild horses at existing levels.
 - 4) In areas with an SSF of 60 or greater.
 - 5) In areas where more forage is needed by wildlife to reach reasonable numbers.
 - 6) To the livestock and wild horses above existing levels.
- 3) Maintain existing seedings through land treatments in the Tippett Allotment.
- 4) Implement a monitoring program on all allotments to determine the true capacity. Establish an initial stocking rate for all large herbivores and base future adjustments of the initial levels on adequate monitoring data.

- a. For livestock obtain written agreements to establish the initial stocking the rate with a goal of active use being consistent with the three years average shown in the EIS (50% of active preference for Tippet).
- b. For wild horses it will be the numbers present in the Antelope Herd as determined by the 1983 inventory.
- c. For wildlife it will be the actual number of animals that could reasonably be expected to use the public lands in the Schell Resource Area.

ROD (Proposed Action)

1. Same as MFP III 4.
2. Manage habitat.
 3. Develop some or all of 4,000 acres of multiple use seedings in Tippet to increase available forage for livestock and big game. The additional AUMS would be divided into 70% for livestock and 30% for big game.
 4. Develop some or all of 2 guzzlers in Tippet.
 5. Develop some or all of 10 springs, 10 miles of pipeline, 2 miles of fence on Tippet to aid in distribution of livestock.
- 6) Develop 71.9 miles of fence in Tippet to improve distribution of livestock and, therefore, utilization of vegetation.

Short---
Term

RPS

- 1) Livestock - Improve 25,176 acres for cattle and 36,078 acres for sheep from fair to good; 119,291 acres for cattle and 19,417 acres for sheep from poor to fair; 14,450 acres for cattle and 14,450 acres for sheep from poor to good; and maintain all acres in good livestock forage condition.
- 2) Wildlife - a) Manage rangeland habitat and forage condition to support reasonable numbers of wildlife demand as follows: deer - 7,491 AUMS and antelope - 310 AUMS, b) Improve and maintain habitat condition of meadows and riparian areas for pronghorn antelope and mule deer, c) Mitigate-improve crucial winter and kidding (key) habitat area for pronghorn antelope. Improve conditions from poor/fair to good.
- 3) Wild horses - Maintain wild horse numbers at the 1983 level (789 AUMS).

Summary

All general and specific allotment objectives are consistent with the land use plan except for a potential problem with General Objective f11 which states that any additional (forage will be divided proportionately. The objective f3 states that if the increase is on the multiple use seeding that it will be divided into 70% for livestock and 30% for big game.

Summarized General Management Objectives

1. Manage for most appropriate seral stages.
2. Monitor ecological condition at each key management area.
3. Reduce livestock losses to poisonous plants (Halogeton, Larkspur).
4. Minimize livestock impacts on key wildlife use areas.
5. Provide appropriate habitat for wildlife species.
6. Manage riparian areas for late or appropriate seral stage for a specific use.
7. Maintain wild free roaming characteristics of horses.
8. Divide forage increases/decreases proportionately among user groups (as per monitoring data).

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 2	D28B037N	T. 24 N., R. 65 E., sec. 27, SW $\frac{1}{4}$ (Dolan Trap Spring)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Bluebunch Wheatgrass	16,000	50	Maintain	60	50
Forbs	70,400	84	Maintain	Maintain Above 55	50
Low Sagebrush	71,000	331	Maintain	Maintain Above 150	50

<u>Ecological Status</u> (% of PNC)	Late Seral Stage (57% of PNC)	Late Seral Stage (50-75% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 20%	20-35%
	Forbs - 17%	10-20%
	Shrubs - 63%	50-65%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 3	D28B071N	T. 23 N., R. 68 E., sec. 2, NW $\frac{1}{4}$ (W.E. Sellas Well No. Pasture)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Western Wheatgrass	130,000	134	Maintain	Maintain Above 100	60
Forbs	5,000	21	Increase	25	60
Winterfat	-	-	Increase	10	60
Shadscale	-	(Trace)	Increase	10	60

<u>Ecological Status</u> (% of PNC)	Early Late Seral (53% of PNC)	Late Seral Stage (51-70% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 65%	55-65%
	Forbs - 25%	15-20%
	Shrubs - 10%	15-30%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 4	D28B109N	T. 23 N., R. 68 E., sec. 1, NW $\frac{1}{4}$ (East Sellas Well No. Pasture)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production*</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Indian Ricegrass	7,000	23	Increase	50	60
Winterfat	12,000	255	Maintain	Maintain Above 245	60

<u>Ecological Status</u> (% of PNC)	<u>Early Climax</u> (78% of PNC)	<u>Climax</u> (76-100% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 8%	5-15%
	Forbs - -	0-5%
	Shrubs - 92%	80-90%

* Increase total production from 250 lbs/ac to 350 lbs/ac.

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 5	D28A012N	T. 24 N., R. 68 E., sec. 30 (Tunnel Canyon road No Pasture)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Indian Ricegrass	11,000	178	Maintain	Maintain Above 125	60
Shadscale	400	1	Increase	10	60

<u>Ecological Status</u> (% of PNC)	<u>Early Seral Stage</u> (21% of PNC)	<u>Mid Seral Stage</u> (26-50% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 74%	50-65%
	Forbs - -	0-5%
	Shrubs - 26%	30-45%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 6	D28A012N	T. 22 N., R. 67 E., sec. 11, SE $\frac{1}{4}$ (S.W. Antelope Valley So. Pasture)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production*</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Indian Ricegrass	10,000	47	Increase	60	60
Shadscale	1,000	4	Increase	50	60

<u>Ecological Status</u> (% of PNC)	<u>Early Seral Stage</u> (23% of PNC)	<u>Mid Seral Stage</u> (26-50% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 33%	25-35%
	Forbs - -	0-5%
	Shrubs - 67%	60-70%

* Increase total production from 150 lbs/ac to 250 lbs/ac.

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>		<u>Management Objective</u>		<u>AUL-%</u>
TAR 7	D28B109N	T. 22 N., R. 68 E., sec. 21, SW $\frac{1}{4}$ (S.E. Antelope Valley So. Pasture)				
		<u>Present Situation</u>				
<u>Key Species</u>	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>		
Winterfat	300,000	415	Maintain or Decrease	Maintain Above 245	60	

<u>Ecological Status</u> (% of PNC)	<u>Late Seral</u> (70% of PNC)		<u>Late Seral to Climax</u> (70-100% of PNC)			

<u>Relative Composition</u> (all species)	Grasses - -		0-10%			
	Forbs - -		0-5%			
	Shrubs - 100%		85-100%			

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>			
TAR 8	D28A021N	T. 23 N., R. 68 E., sec. 34 (N.E. Antelope Valley S. Pasture)			
<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density (Plants/ac.)</u>	<u>Production (Lbs./ac.)</u>	<u>Density</u>	<u>Production</u>	
Indian Ricegrass	42,000	123	Maintain	150	60
Winterfat	89,000	323	Maintain	Maintain Above 200	60
Bud Sagebrush	1,600	23	Increase	30	60

<u>Ecological Status (% of PNC)</u>	<u>Late Seral (61% of PNC)</u>		<u>Late Seral (60-75% of PNC)</u>		

<u>Relative Composition (all species)</u>	Grasses - 26%		25-30%		
	Forbs - -		0-5%		
	Shrubs - 74%		70-75%		

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 9	Not Applicable	T. 22 N., R. 68 E., sec. 25, NE¼ (Moffat Chaining)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density (Plants/ac.)</u>	<u>Production (Lbs./ac.)</u>	<u>Density</u>	<u>Production</u>	
Crested Wheatgrass	23,000	194	Maintain	Maintain	60
Native Grasses	5,000	47	Increase	60	60
Forbs	-	(Trace)	Increase	10	60
Trees (P/J)	166	-	Maintain below 200 (6 feet or taller)	-	60

Ecological Status - Not Applicable -
(% of PNC)

Relative Composition (all species)	Grasses - 65%	60-70%
	Forbs - -	0-5%
	Shrubs - 35%	30-40%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 11	Not Applicable	T. 21 N., R. 69 E., sec. 15 (Rock Spring Chaining)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density (Plants/ac.)</u>	<u>Production (Lbs./ac.)</u>	<u>Density</u>	<u>Production</u>	
Crested Wheatgrass	66,000	227	Maintain	Maintain Above 175	60
Native Grasses	66,000	64	Maintain	80	60
Forbs	-	27	Maintain	30	60
Wyoming Big Sagebrush	1,598	150	Maintain	Maintain	60

Ecological Status - Not Applicable -
(% of PNC)

Relative Composition (all species)	Grasses - 60%	55-65%
	Forbs - 5%	5-10%
	Shrubs - 35%	30-40%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>			
TAR 12	Not Applicable	T. 23 N., R. 66 E., sec. 6 (Henriod Seeding)			
<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density (Plants/ac.)</u>	<u>Production (Lbs./ac.)</u>	<u>Density</u>	<u>Production</u>	
Crested Wheatgrass	76,000	179	Increase	200	60
Wyoming Big Sagebrush	3,000	110	Maintain	110	60

Relative Composition (all species)	Grasses - 59%		50-75%		
	Forbs - -				
	Shrubs - 41%		25-50%		

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>		<u>Management Objective</u>		<u>AUL-%</u>
TAR 13	Not Applicable	T. 20 N., R. 69 E., sec. 33 (Tungstonia chaining)				
<u>Key Species</u>	<u>Present Situation</u>				<u>AUL-%</u>	
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>		
Crested Wheatgrass	22,000	140	Maintain	Maintain	60	
Native Grasses	22,000	114	Maintain or	140	60	
			Increase			
Forbs	-	12	Increase	15	60	
Antelope Bitterbrush	-	14	Maintain or	40	60	
			Increase			
Trees (P/J)	267	-	Maintain below	-	60	
			400			

Ecological Status
(% of PNC)

- Not Applicable -

Relative Composition
(all species)

Grasses - 82%
Forbs - 5%
Shrubs - 13%

75-85%
5-10%
10-20%

Studies Number

Ecological Site

Location

TAR 14

D28B022N

T. 23 N., R. 67 E., sec. 17
(Sand Spring Antelope)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	<u>AUL-%</u>
Western Wheatgrass	23,000	38	Increase	100	50
Forbs	176,000	70	Maintain	150	50
Mountain Big Sagebrush	16,000	57	or Increase		
			Maintain	Maintain	50

Ecological Status
(% of PNC)

Mid Seral Stage
(42% of PNC)

Mid Seral Stage
(45-65% of PNC)

Relative Composition
(all species)

Grasses - 45%
Forbs - 31%
Shrubs - 24%

45-50%
15-25%
20-30%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAR 15	D28B030N	T. 24 N., R. 67 E., sec. 33 (E. Central Antelope)

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL</u>
	<u>Density (Plants/ac.)</u>	<u>Production (Lbs./ac.)</u>	<u>Density</u>	<u>Production</u>	
Western Wheatgrass	204,000	145	Maintain	Maintain Over 100	55
Forbs	12,000	37	Increase	75	55
Mountain Big Sagebrush	2,000	698	Maintain	Maintain Above 500	50

<u>Ecological Status</u> (% of PNC)	Mid Seral Stage (33% of PNC)	Mid Seral Stage (30-50% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 17%	20-50%
	Forbs - 6%	5-10%
	Shrubs - 77%	45-70%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>
TAW 1	D28A013N	T. 22 N., R. 69 E., sec. 13, NWNE

<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Indian Ricegrass	581	5	Increase	15	60
Forbs	2,300	(Trace)	Increase	5	60
Black Sagebrush	2,000	138	Maintain	160	60
Winterfat	3,400	1	Maintain or Increase	10	60

<u>Ecological Status</u> (% of PNC)	Mid Seral (46% of PNC)	Mid to Late Seral (45-75% of PNC)
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<u>Relative Composition</u> (all species)	Grasses - 4%	5-10%
	Forbs - -	0-5%
	Shrubs - 96%	85-95%

<u>Studies Number</u>	<u>Ecological Site</u>	<u>Location</u>			
TAW 2	D28A012N	T. 22 N., R. 67 E. sec. 3			
<u>Key Species</u>	<u>Present Situation</u>		<u>Management Objective</u>		<u>AUL-%</u>
	<u>Density</u> (Plants/ac.)	<u>Production</u> (Lbs./ac.)	<u>Density</u>	<u>Production</u>	
Indian Ricegrass	6,000	14	Increase	50	60
Forbs	-	-	Increase	5	60
Shadscale	1,000	29	Increase	60	60

<u>Ecological Status</u> (% of PNC)	<u>Early Seral Stage</u> (24% of PNC)		<u>Mid Seral Stage</u> (26-50% of PNC)		

<u>Relative Composition</u> (all species)	<u>Grasses - 18%</u>		20-30%		
	<u>Forbs - -</u>		0-5%		
	<u>Shrubs - 82%</u>		65-80%		

Tippett Allotment
Vegetative Type Acres

<u>Type</u>	<u>Acres</u>
ARARA ARARA ARARA	38,895
ARAR	2,861
ARTRW	8 876
ARVA2	9,517
AGSP	8,325
AGCR	5,918
EULA	16,333
AGSM	7,011
P-J	69,898
MTN. MAHOGANY	6,586
ATCO	22,759
SAVE	<u>3,062</u>
	200,041 (Total Fed. Acres)

1985
Acres by Use Zone Within
Vegetative Stratum

Pasture#/ Vegetative Stratum	% of Allotment	General Location	Key Sp. AUF	Acres by Use Zone						Total Acres by Stratum
				Zero 0	Slight 1-20	Light 21-40	Moderate 41-60	Heavy 61-80	Severe 81-100	
1/Salt Desert Shrub (Save, ATCO, EULA, mixture)	13	Antelope Valley	ORHY 55%	-	1,178	1,854	12,676	4,635	5,478	25,821
2/EULA	8	Antelope & Spring Valleys	EULA 45%	88	1,000	1,849	3,463	8,349	1,584	16,333
3/AGSM	4	Dune Areas	AGSM 55%	-	177	244	5,256	1,212	122	7,011
4/AGCR	3	Seedings Chaining	AGCR 65%	-	1,973	297	1,994	679	976	5,919
5/AGSP	4	Mountain Drainages	AGSP 55%	-	1,866	-	6,459	-	-	8,325
6/ARARN ARAR & ARNO	18	MTN FAN	ARARN 45%	339	22,799	3,671	7,628	1,140	339	35,916
7/SHRUBS SYOR	6	MTN Areas	SHRUBS 45%	-	2,483	1,079	5,235	1,154	1,464	11,415
8/MIXED TYPE (Sagebrsh, P/J with grass)	22	MTN Upland Areas	AGSP 55%	2,889	20,203	12,785	1,929	3,980	2,232	44,018
9/NO FORAGE	22	Closed Canopy P/J sagebrush benches and Rock Out- crop	-	-	-	-	-	-	-	45,283
Total				3,316	51,679	21,779	44,640	21,149	12,195	200,041

* No forage total includes acres of black sagebrush, big sagebrush, Mt. Mahogany and P/J where forage is unavailable.

Tippett Allotment
 AUMS Used in the 1985 Grazing Year by User
 Class and Vegetation Zone

SHEEP:	<u>AUMS</u>	<u>Actual Use Location</u>	<u>AUMS/by Veg. Zone #</u>	
	495	S. Schellbourne Pass Bench (sp. valley)	495	1
	393	E. Spring Valley	50	2
			300	6
			43	8
	658	W. Spring Valley	427	6
			231	8
	243	Schell Creek Range	200	5
			43	7
	318	Antelope Range	168	6
			150	7
	360	W. Antelope Valley Bench	160	1
			200	6
	236	E. Antelope Valley Bench	50	4

Total AUMS Used 2,703 2,703

CATTLE:	<u>AUMS</u>	<u>Actual Use Location</u>	<u>AUMS/by Veg. Zone #</u>	
	4,526	Antelope Valley	1,358	1
			2,263	2
			905	3
	1,175	Kerns	646	4
			329	5
			200	8
	47	Spring Valley	17	2
			20	5
			10	6
	75	Schell Creek Range	65	5
			10	6

Total AUMS Used 5,823 5,823

(Total all livestock Preference = 13,615 AUMS)
 (7,665 AUMS sheep and 5,950 AUMS cattle)

WILD HORSES:	<u>AUMS</u>	<u>Actual Use Location</u>	<u>AUMS/by Veg. Zone #</u>	
	852	Antelope Range	276	6
			444	7
			132	8
	408	Schell Creek Range	408	8

Total AUMS Used 1,260 1,260

Tippett Allotment
Total AUMS by CLASS BY YEAR

<u>Year</u>	<u>Sheep</u>	<u>% of Total Pref.</u>	<u>Cattle</u>	<u>% of Total Pref.</u>
1980	2,964	39%	1,073	18%
1981	7,108	93%	4,240	71%
1982	7,665	100%	4,904	82%
1983	295	1/2%	5,001	84%
1984	6,863	89%	5,975	100%+
1985	2,703	35%	5,823	98%
1986	2,741 (to date)	36% (to date)	4,259	72% (to date)

AUMS Used Annually by Antelope = 121
 AUMS Used Annually by Deer = 1,064
1,185 Total

AUMS Used 1985 by (105) wild horses = 1,260

Total livestock preference is 13,615 AUMS of which 7,665 AUMS are sheep and 5,950 AUMS are for cattle. Currently there are two permittees (Hank Vogler - 5,950 C, 4,800 S, and John Phillips 2,865 S).

Precipitation by Growing Season

Ibapah

Year	April	May	June	July	Aug.	Sept.	Total
1980	.6	3.41	1.58	.58	.43	1.06	7.66
1981	.75	2.53	.06	.65	T	.53	4.52
1982	.45	1.35	.23	1.64	.78	5.85	10.30
1983	2.28	.91	2.18	.25	4.09	1.13	10.84

Ibapah Average (10 yr.)	.75	1.24	1.09	.58	0.65	.51	4.82
-------------------------------	-----	------	------	-----	------	-----	------

Ely							
1984	.94	.35	.63	2.18	2.01	3.73	9.89
1985	.17	1.33	.43	.58	T	1.82	4.33
1986	1.32	.51	.02	.09	1.24	1.42	4.60

Ely Average (30 yr.)	.92	1.08	.8	.65	.62	.7	4.77
----------------------------	-----	------	----	-----	-----	----	------

% of Normal Index - Growing Season

1980 - 1.58
 1981 - .94
 1982 - 2.14
 1983 - 2.25
 1984 - 2.07
 1985 - .81
 1986 - .96

7 year average = 1.54

Precipitation Data

The most representative weather station, at Ibapah was incomplete. It showed years 1980-1983 only. This data was used where it was available but in years 1984-1986 Ely weather station data was used.

Because Ibapah is in a summer precipitation area, it is representative of the nearly half of Tippett that is also under a summer precipitation influence. Therefore, the Ibapah growing season amounts should be slightly higher than Ely and this is what the data indicated.

Comparing the Ely and Ibapah stations for 1980-1983, it was found that the relative increases and declines every month for each station were consistent. Therefore, the Ibapah data seemed to be valid and was used.

It is felt that the Ely station data would be representative of the winter precipitation areas in Tippett or just slightly below.

When analyzing the data, one should consider that Ibapah is on for summer precipitation areas, over the expected average for the winter precipitation areas (not more than $\frac{1}{2}$ " overall). The Ely data will be below the average for the summer precipitation areas (by $\frac{3}{4}$ -1" overall) and will be slightly below the average for winter areas (by $\frac{1}{2}$ " overall).

PPT Observations Summary

We had good PPT in the springs into early summers in 1981,82,83,84.

However, in 1985 we had a very dry spring and summer and the lack of production in forage plants was very obvious when compared to the previous four years. Then again this spring and early summer (1986), we had very dry conditions, although slightly better than in 1985. We had very high utilization recorded in 1985 and expect a similar finding for 1986. The situation is again the same or similar for numbers of livestock and wildlife, more horses, and less available forage, thus more use on all plants. The severe spring summer drought of 1985 was the worst in decades according to John James, Nevada State Climatologists. On July of 1985, recorded temperatures averaging above normal and set an all time of 100°F for Ely.

Tippett Allotment
Utilization - Actual Use

Year	Livestock AUMS Used (% Preference (13,615))		Range of Utilization by Key Areas and Average	
			<u>%</u>	<u>Avg. %</u>
1980	4,037	(30%)	-	-
1981	11,348	(83%)	12-30 (2 key areas)	21
1982	12,569	(92%)	28-52 (6 key areas)	47
1983	5,296	(39%)	11-56 (10 key areas)	35
1984	12,838	(94%)	29-56 (9 key areas)	41
1985	8,526	(63%)	11-90 (17 key areas)	43
To date	7,000	(51%)	75 (1 key area)	

Key Area#	1981	1982	1983	1984	1985	1986
1	KG AGSP 13%	AGCR 38%			AGSP 50%	*AGSP 90%
	KS ARAR 10%	SYCR 12%			SYOR 50%	SYOR 60%
	OV 12%	28%			50%	75%
2	KG AGCR/AGSP 41%				AGSP 20%	AG
	KS 17%				APAR 1%	
	OV 30%				11%	
3			AGSM 38%	AGSM 30%	AGSM 16%	
			CHVI 9%	CHVI 19%	CHVI 10%	
			25%	37%	21%	
4			EULA 51%	EULA 52%	ORHY 65%	
			ORHY 78% 63	ORHY 72% 02		
			CHVI 40%	CHVI 14%	CHVI 23%	
			56%	38%	48%	
5			ORHY 42%	ORHY 76%	ORHY 56%	
			CHVI 10%	CHVI 17%	CHVI 26%	
			38%	46%	41%	
6			ORHY 42%	ORHY 68%	ORHY 60%	
			EPNE 30%	CHVI 9%	CHVI 22%	
			21%	37%	41%	
7			EULA 60%	EULA 54%	EULA 56%	
			CHVI 10%	CHVI 10%		
			47%	41%	53%	
8			ORHY 64%	ORHY 72%	ORHY 44%	
			EULA 51% 58	EULA 62% 67	ORHY 30 36	
			CHVI 11%	CHVI 30%		
			40%	45%	36%	
9			AGCR 15%	AGCR 56%	AGCR 35%	
					EPNE 20%	
				56%	24%	
10		AGCR 74%	AGCR 72%		ARCR 88%	
		PUTR 47%			PUTR 90%	
		55%	30%		69%	
11		AGCR 70%			AGCR 90%	
		AMAL 35%				
		51%			90%	
12					AGCR 20%	
					20%	
13		AGCR 70%			AGCR 70%	
		SYOR 30%			SYOR 60%	
		52%			65%	

Key Area#	1981	1982	1983	1984	1985	1986
14					AGCR 70%	
					50%	
15					AGSM 50%	
					CHVI 20%	
					35%	
W1 KG		ORHY 59%	ORHY 19%	ORHY 57%	ORHY 42%	
KS		CHVI 62%	CHVI 63%	ARNO 30%	ARNO 37%	
OV		47%	33%	29%	32%	
W2 KG		ORHY 35%	ORHY 18%	ORHY 35%	ORHY 33%	
KS		ARNO 58%	ARNO 59%	ARNO 40%	ARNO 43%	
OV		47%	44%	39%	44%	
*KG= Key Grass Specie (if AGSP /ACGR then means add added and divided for one use level)						
KS= Key Shrub Specie						
OV= Overall average of all species utilized						
Grass Valley Native	KG	AGSP 38%				
	KS					
	OV	34%				
Bluemass Native	KG	AGSP 44%				
	KS					
	OV	46%				
Lunch Canyon Native	KG	AGSP 65%				
	KS					
	OV	45%				
Calcutta Burn All Over	KG	AGCR 38%				
	KS	SYOR 14%				
	OV	26%				

Tippett Allotment
Trend and Monitoring Interpretation Summary

Key Area	Key Sp. Mgmt. Obj.	Eco. Status % Comp	Trend Change	Utilization %					Habitat Cond. % Rating %		Cause for Change	Species Sample Size that Change		ANOVA/ Duncans 5% & 10%	Comments	Objectives Met	
				81	82	83	84	85	86	Deer		Antelope					Utiliz.
1	AGCR → ↑	N/A		38					-	-		-	-	Due to severity of grazing occurring just prior to planned second reading in 1986 (sheep camp directly on transect) it was decided to try again another year.	Unknown	Unknown	
	AGSP → ↑	(Seeding)	(Probably at) →	13		50			-	-		-	-				
	SYOR			12		50			-	-		-	-				
2	AGSP → ↑	59%-Late AGSP 10%	↑			20			-	-	Low Util.	7.5	16.5	Good Condition class-AGSP not at min. 20% for meaningful trend evaluation, but is increasing - May be insufficient AGSP seed source to compete with ARAR - stocking level dropped - trend overall is static. Meeting objectives.	Yes	Yes	
	ARAR →	ARAR 63%	→			1			-	-	Seed Source	64	69				
		Overall	→														
3	AGSM →	53%-Late AGSM 39%	→		38	30	16		-	-	Uncertain	70.5	74	Low Good condition Utilization ok, PPT high/low stocking rates have remained constant, yet unauthorized use has been suspected - overall trend is static to down ward. Not meeting objectives.	Yes	No	
	ORHY → ↑	ORHY 26%	↓						-	-	PPT	29.5	19				
	CHVI →	CHVI 10%	→		9	19	10		-	45-Fair	Unauth. Use	20.5	28				
		Overall	→ ↓								Distrib. Season Use						
4	ORHY → ↑	70%-PNC 8%	↑		78	72	65		-	-	PPT	34	45	Low excellent PNC - exceeding P.U. - PPT Good/low years - overall trend static to upward - Distribution and seasons of use problems - meeting all K.A. objectives.	No	Yes	
	EULA →	92%	→		51	52			-	45-Fair	Seasons Use	77.5	81				
		Overall	→ ↑								Distrib. Unauth. Use						

Trend and Monitoring Interpretation Summary

Key Area	Key Sp. Mgmt. Obj.	Eco. Status % Comp	Trend Change	Utilization %						Habitat Cond. % Rating %		Cause for Change	Species Sample Size that Change		ANOVA/Duncans 5% & 10%		Comments	Objectives Met	
				81	82	83	84	85	86	Deer	Antelope							Utiliz.	Trend
14		42% - Mid															High Fair condition PPT - extremes - above P.U.		
	AGSM →↑	16%	↑					70		-	-	PPT Low 85,	16.5	76	Y	Y	AGSM - distrib. probs. -		
	CAREX	15%	↓								-	86 - Carex	70	.5	Y	Y	Low PPT excluded carex	No	Yes
	TAOF	18%	→									Distrib.	28.5	33	N	N	allowed AGSM increase -		
	POTEN	11%	→										-	-	N	N	overall trend static to		
	ARTRV →	24%											-	-	-	-	upward - K.A. obj. being		
		Overall	→↑														met (heavy horse use).		
15		35% - Mid																	
	AGSM →↑	16%	↑					50		-	-	PPT	59.5	87.5	Y	Y	Mid-seral condition - PPT-		
	ARTRV →↑	76%	↓							53 Fair	68 Good		52	40	N	Y	Utiliz. o.k. - distrib.		
	SYOR →	1%	↑										1	4.5	Y	Y	probs. - horse use area -	Yes	Yes
		Overall	→↑														overall trend static to		
																	upward - K.A. obj. being		
																	met.		
TW1		46% - Mid																	
	ORHY							59	19	57	42								
	ARNOV																		
	EULA																		
TW2		21% - Mid																	
	ORHY																		
	ATCO																		

Weather Growing Season. Index % of Normal

1980	1981	1982	1983	1984	1985	To date (12/5/86)
1.58	.94	2.14	2.25	2.07	.81	.96

United States
Department of the Interior
Bureau of Land Management

MONITORING STUDIES STRATA SUMMARY

Stratum No.	Key Management Area	Veg Type	Ecol. Site No.	Response ¹ Potential	Key Species	Soils Series	Grazing Animals in stratum	Acreage & % of Allot Represented by Stratum	Type of Study	Date Established	Existing	Trend ³
											Ecological ² Status and or Habitat Condition	
	1	Seeding	D28B062N	High	AGCR AGSP SYOR	N/A	Sheep Cattle Deer Horse	2,000 acres 1%	Frequency Condition Utiliza- tion PPT	9-23-81	NA (close to potential) can't rate seeding for Eco. status	No Apparent
	2	Low Sage	D28B037N	Medium	ARAR AGSP	N/A	Sheep Deer Horse	4,000 1%	F C U P	9-24-81	Late Seral (59%)	
	3	Western Wheat-grass	D28B071N	Medium	AGSM	N/A	Cattle Antelope	6,500 3%	F C U P	8-5-82	Early Late Seral (53%)	
	4	Winter-fat	D28B109N	High	EULA ORHY	N/A	Cattle Antelope	5,800 3%	F C U P	8-5-82	Early Climax (78%)	
	5	Rice-grass Shad-scale	D28A012N	(Low)	ORHY ATCO	N/A	Sheep Cattle Antelope Horse	16,000 8%	F C U P	8-4-82	Early Seral (20%)	
	6	Rice-grass Shad-scale	D28A012N	(Low)	ORHY ATCO	N/A	Sheep Cattle Antelope	See Key area 5	F C U P		Early Seral (23%)	

- ¹ Management response potential of the ecological site i.e., low, medium, or high.
² For Ecological Status identify seral stage and percentage rating i.e., mid seral 41%.
³ Indicate up, down or not apparent.

United States
Department of the Interior
Bureau of Land Management

MONITORING STUDIES STRATA SUMMARY

Stratum No.	Key Management Area	Veg Type	Ecol. Site No.	Response <u>1</u> Potential	Key Species	Soils Series	Grazing Animals in stratum	Acreage & % of Allot Represented by Stratum	Type of Study	Date Established	Existing	Trend <u>3</u>
											Ecological <u>2</u> Status and or Habitat Condition	
	7	Winter-fat	D28B109N	High	EULA	N/A	Antelope Cattle	5,500 3%	F C U P	8-12-82	Late Seral (70%)	
	8	Winter-fat	D28A021N	Medium	ORHY EULA	N/A	Cattle Antelope	4,500 2%	F C U P	8-12-82	Late Seral (61%)	
	9	Crested Wheat- grass		Medium	AGCR	N/A	Cattle Sheep Antelope Deer	1,000 1/2%	F C U P	9-16-82	N/A Can't rate chain- ing for eco. status (mid-poten- tial)	
	10	Crested Wheat- grass		Medium	AGCR	N/A	Cattle Sheep Deer	1,000 1/2%	F C U P	9-16-82	N/A Can't rate chain- ing for eco. status (mid-poten- tial)	
	11	Crested Wheat- grass scale		Medium	AGCR	N/A	Cattle Sheep Deer	800 1/2%	F C U P	9-22-82	N/A Can't rate chain- ing for eco. status (mid-poten- tial)	
	12	Crested Wheat grass		Medium	AGCR	N/A	Cattle Sheep Deer	1,800 1%	F C U P	8-13-82	N/A Can't rate chain- ing for eco. status (mid-poten- tial)	

1 Management response potential of the ecological site i.e., low, medium, or high.

2 For Ecological Status identify seral stage and percentage rating i.e., mid seral 41%.

3 Indicate up, down or not apparent.

United States
Department of the Interior
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MONITORING STUDIES STRATA SUMMARY

Stratum No.	Key Management Area	Veg Type	Ecol. Site No.	Response ¹ Potential	Key Species	Soils Series	Grazing Animals in stratum	Acreage & % of Allot Represented by Stratum	Type of Study	Date Established	Existing	
											Ecological ² Status and or Habitat Condition	Trend ³
	13	Crested Wheat-grass	D28B060N	Medium	AGCR	N/A	Cattle Sheep Deer	1,300 1%	F C U P	9-2-82	N/A can't read ecological condition on chainings	
	14	Western Wheat-	D28B022N	Low	AGSM	N/A	Sheep Horse Deer	6,400 3%	F C U P	7-22-82	Mid-Seral (42%)	
	15	Western Wheat-grass	D28B03N	Low	AGSM	N/A	Sheep Horse Deer	4,500 2%	F C U P	8-13-82	Mid-Seral (33%)	
	TW1 16	Black-sage	D28013N	Medium	ORHY ARNO EULA	N/A	Sheep Cattle Antelope	10,900 5%	F C U P	11-17-82	Mid-Seral (46%)	
	TW2 17	Rice-grass Shad-scale	D28A012N	Low	ORHY ATCO	N/A	Cattle Sheep Antelope Horse	See key 5	F C U P	11-23-82	Early Seral (21%)	

- 1] Management response potential of the ecological site i.e., low, medium, or high.
 2] For Ecological Status identify seral stage and percentage rating i.e., mid seral 41%.
 3] Indicate up, down or not apparent.

Issues

- 1) There is insufficient forage to meet the demand of all users (cattle, sheep, wild life, and wild horses).
- 2) Conflicts with season of use with livestock and sage grouse nesting in the Henriod Seeding, and south just adjacent to the seeding, and in the Siegel Creek area from 5/1 to 5/15.
- 3) Current grazing practices and management facilities are inadequate to ensure proper distribution and utilization.
- 4) Productivity of seeding/chainings is reduced to invasion of sagebrush and P-J.
- 5) Poisonous plants are a recurring problem by killing livestock (Halogeton, and Larkspur) annually in the allotment.
- 6) There is inadequate yearlong habitat and forage for wildlife in the allotment.
- 7) The wild and free roaming characteristics of horses need to be maintained.
- 8) Soils and ecological status data is insufficient for the allotment. However, there is significant level of concern among interest groups and management agencies to manage for the most appropriate seral stage to meet the requirements of the key foraging animals.
- 9) Allowable use factors are being exceeded in some areas of the allotment.
- 10) The ROD-LUP-MFP III says an AMP will be implemented in the Tippet Allotment. MFPI criteria also says seedings should be implemented in the allotment, and existing seeding shall be maintained through land treatments.
- 11) Interest groups want sufficient forage and water resources to sustain reasonable numbers of wildlife, management level of horses determined in the Antelope HMAP, and preference levels for livestock.

Tippett Allotment Evaluation
Conclusions

- 1) Actual use in 1985 by livestock was 8,526 AUMS or 63% of preference (13,615 AUMS), wildlife was 1,185 AUMS or 100% of reasonable numbers, wild horses was 1,260 AUMS or 105 horses yearlong. All forage users accounted for 10,971 AUMS used. This was 2,657 AUMS below the computed stocking rate of 13,628 AUMS. Were 100% of livestock preference activated, total forage demand would have been 16,060 AUMS, or 2,432 AUMS above the computed stocking rate. For 1985 if the remaining 2,657 AUMS would have gone to livestock that would have only been 82% of preference.
- 2) Distribution among forage users in the allotment is a significant problem.
- 3) Overall trend is stable in the Tippett Allotment.
- 4) Approximately 22% of the allotment produces no forage.

Tippett Allotment Recommendations

- 1) Implement the Tippett Allotment AMP.
- 2) Prior to the AMP implementation set levels of use for Antelope Valley (#'s 9 & 10) North Schell Bench (#2), Henroid Seeding (#3), and Spring Valley Bottom (#4)..

Cattle

Pastures 9&10

No more than 550 head from 12/1 to 4/30.
No more than 400 head from 11/1 to 11/30 and from 5/1 to 5/31.
No use will be allowed from 6/1 to 10/31.

*5x550 = 2750 AUMS
400 AUMS*

Pastures 2,3,&4

Up to 150 head will be allowed from 5/1 to 5/31 and from 11/1 to 11/30.

Spring Valley and Schell Creek Range

150 head from 6/1 to 10/31.

Kern Mountains

350 head from 6/1 to 10/31.

Sheep

Pastures 9&10

Use no more than 1,556 AUMS from 2/1 to 5/31.
No use from 6/1 to 1/31.

Spring Valley and Schell Creek Range

2,200 head from 5/1 to 6/15.
1,000 head from 6/16 to 9/30.
1,500 head from 10/1 to 11/30.

Antelope Mountains

1,500 head from 6/1 to 9/30.

Kern Mountains

2,500 head from 5/1 to 11/30.

- 3) Adjust areas of use, seasons of use, levels of use five years after the AMP is implemented if no additional feasible management facilities, water projects, and vegetative conversions are needed.
- 4) Continue to monitor to determine if management objectives are being met.
- 5) Continue consultation, cooperation, and coordination with all user and interest groups.

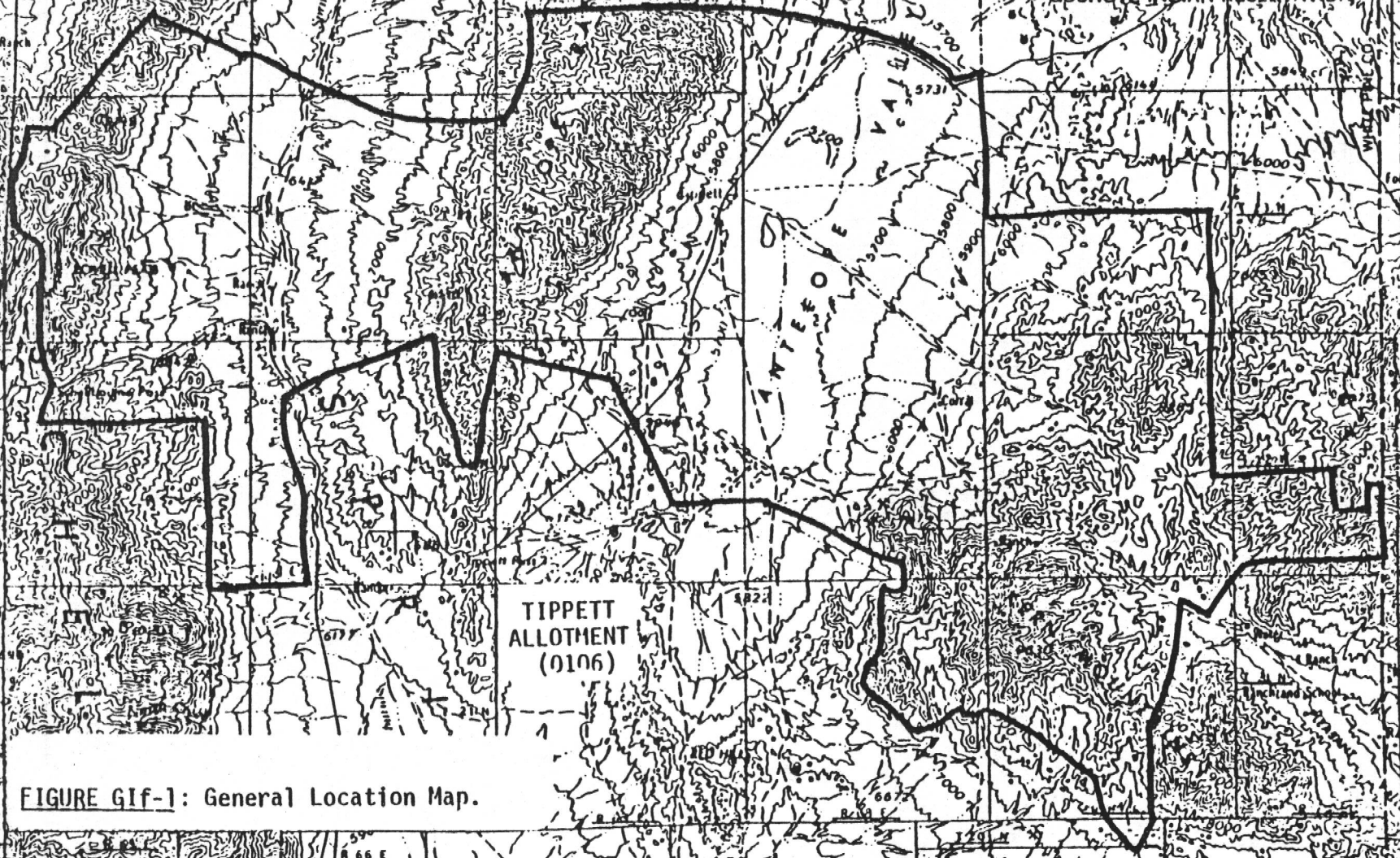
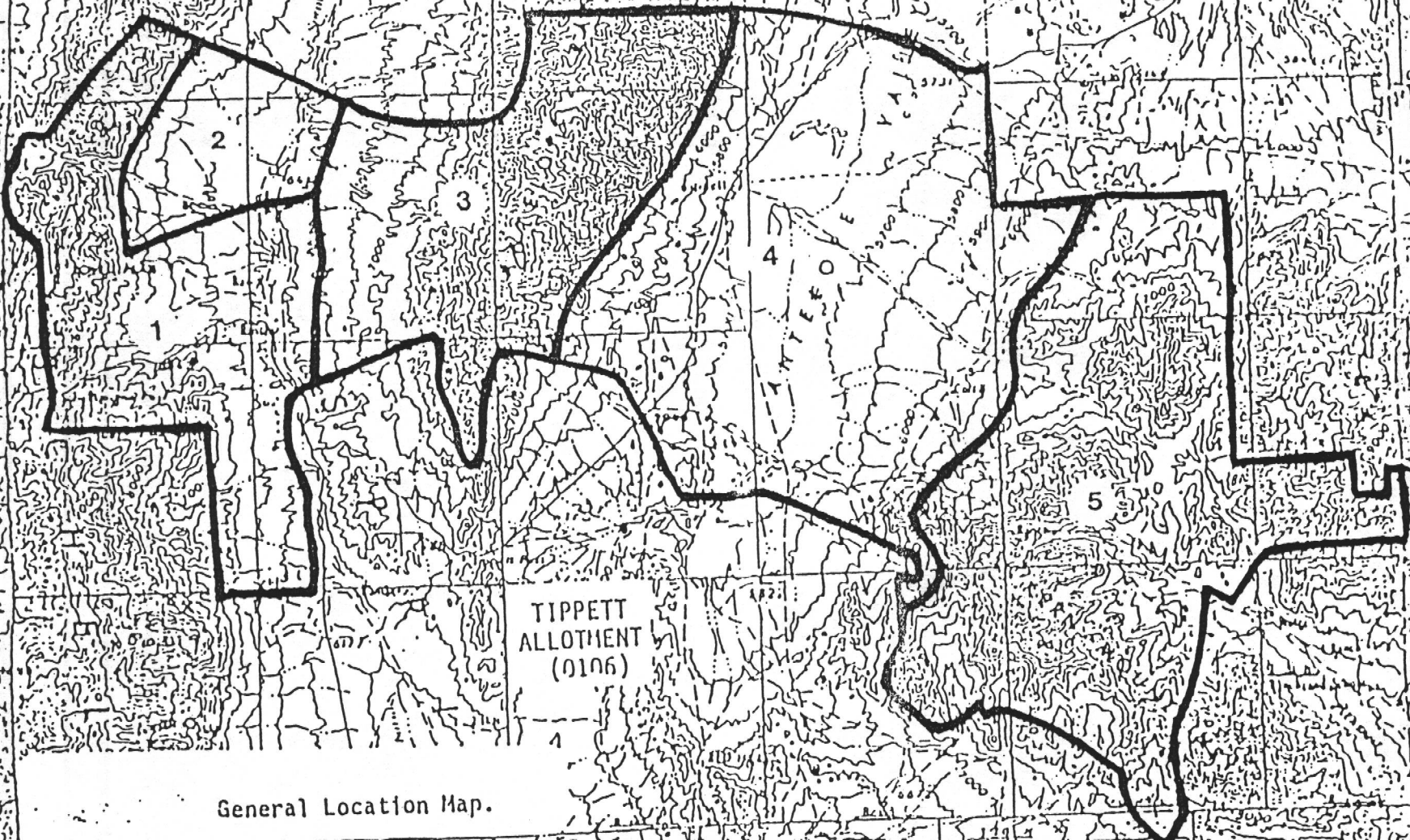


FIGURE GIF-1: General Location Map.



TIPPETT
ALLOTMENT
(0106)

General Location Map.

HUMBOLDT
NATIONAL FOREST

GOSHUTE INDIAN RESERVATION

W H O A

WILD HORSE ORGANIZED ASSISTANCE
P.O. BOX 555
RENO, NEVADA 89504



a note from

July 28, 1989

Dawn Y. Lappin

Mr. Gerald M. Smith, Manager
Schell Resource Area
Ely District Office
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. Smith:

Thank you very much for the opportunity to provide comments relating to the Tippet Allotment Evaluation.

The Tippet Evaluation document was clear, the data useful to understand the rationale of the evaluation and options. I would appreciate a copy of the AMP when it is completed.

General Management Objectives

Why wasn't a monitoring program established after the completion of the EIS?

Based on the recent IBLA (6/89) order, will the agency base the attainment of wild horse optimum levels through monitoring?

3. I do not understand the split of 70% livestock, 30% wildlife? The wild horses are not just an add on species on the public rangeland. The intent, according to the Congressional Record H9059 (Oct. 4, 1971), was "...a proper balance must be maintained between forage and animal use. This bill does not prevent that but it will prevent indiscriminant slaughter of wild horses and burros and assure them of equal consideration on the public land along with other wildlife and domestic livestock." Now you are stating that, despite the fact that through numbers, they too are managed, they will not share in the proportionate increases in forage?

It is apparent that many of the adjudications the in past were based on "historical use" and the maintenance of the historical use is one big reason why the ranges are in tough shape. Although by in large this is the first evaluation I have seen where a good percentage of the allotment has met management objectives.

Distribution, at least as far as the horses are concerned is a matter of understanding why the horses prefer a particular area. This cannot be understood unless you have some suitability criteria from which to make those judgements.

Is the 22% of unproductive lands because of topography, rocky areas?

Recommendations"

Reduce "grazing animals" based on measured utilization and actual use, by the direct percentage of class of animal utilizing it, in order to maintain proper use on the vegetation..

Require better distribution by permittees. (Some districts require riding or pushing of the livestock.

Rehabilitate springs and waters through cooperative agreements so they are available for all users and to better distribute animals.

Continue to monitor.

It is understood that initially the forage was sold to permittees; but the public's interest in wild horses and increased wildlife values will have to adjust that forage usage.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: Board of Trustees
David A. Hornbeck, Esq.

- ① Get copy of Lippett AMP
- ② When will priority of uses be established?
- ③ In ROD pg 2 obj. - add. AUMs 70/30 - what for horses? - also fences interfere w/horses
- ④ In RPS - maintain at 1983 level - IBLA

BOB MILLER
Acting Governor

STATE OF NEVADA

TERRI JAY
Executive Director

File Copy



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

Stewart Facility
Capitol Complex
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P.O. Box 5896
Reno, Nevada 89513

July 28, 1989

Gerald M. Smith, Area Manager
BLM - Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. Smith,

Thank you for the opportunity to comment on the Tippet
Allotment Evaluation Summary.

In your document, you state that the allotment has an AMP
proposed for it. I would like to request a copy of the AMP and
would hereby request an extension to modify my comments on the
Allotment Evaluation Summary pending the information in the AMP.

General Management Objectives This states that you will provide
sufficient forage and water resources to sustain... the
management level of horses as determined in the Antelope HMAP...
In light of the recent IBLA ruling, horses must be managed in a
"thriving ecological balance." How will you modify your
objectives to comply?

Tippet Allotment Objectives LUP-MFP III 3). What do you mean
by "land treatments" to maintain seedings? 4) Why wasn't a
monitoring program established previously to determine "the true
capacity?"

LUP-MFP III 4. b. Numbers present in the Antelope Herd in 1983
inventory are fine as as a starting place for monitoring as long
as no reductions are done until data shows the Thriving
Ecological Balance is not being maintained.

ROD 3. If additional forage is made available and the split is
70% livestock/30% big game, what are horses - livestock or big
game?

6. How will you mitigate impacts to the free-roaming
behavior of horses if you plan on 71.9 miles of fence?

RPS 3) "Maintain wild horse numbers at the 1983 level." What
is your justification for this in light of the recent IBLA
decision?

Gerald Smith
July 28, 1989
Page 2

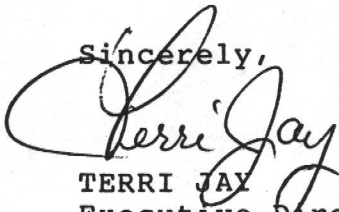
Summary - I refer again to the ROD 3. and ask are horses to receive additional proportional forage as "livestock" or "big game?" Please explain how you can justify "proportional" increases in light of the intent of the law as contained in the Congressional Record, dated October 4, 1989, Vol. 117, No. 146.

That document states that "...assure them (wild horses) of EQUAL consideration on the public land along with other wildlife and domestic livestock." And, "Wild horses and burros...should receive the SAME consideration as those animals more commonly considered wildlife, such as deer, elk, desert sheep and as domestic livestock now using the public lands. Wild horses and burros alone should not be singled out for slaughter or reduction if and when reduction is required by adverse range condition."

In conclusion, it is evident that strong measures are necessary to try and repair the past abuses of the resource. I applaud your efforts at developing sound range management programs for this allotment.

Thank you for your time.

Sincerely,



TERRI JAY
Executive Director

BOB MILLER
Acting Governor

STATE OF NEVADA

TERRI JAY
Executive Director



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

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April 27, 1990

Gerald M. Smith, Area Manager
Schell Resource Area
Ely District - BLM
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. Smith,

This letter is response to your Notice of Proposed Multiple Use Decision for the Tippet Allotment.

The Commission is an affected interest in this matter since we have been participating in the allotment evaluation process for all allotments that are in wild horse herd areas and we are concerned for the welfare of wild horses in Nevada.

The Commission is protesting the decision for several reasons.

First, your documentation states that, "Unauthorized use was probably quite significant during the 1981-85 period and although several trespass actions resulted in settlements, they appear to have fallen considerably short of reflecting the true picture."

This indicates a lack of livestock management in the allotment which, since it occurred over several years, was not immediately corrected by the Bureau once it became known.

If the livestock HAD been managed properly, and the trespass stopped immediately, a reduction in wild horses may not be necessary.

Since the trespass grazing of livestock over a five year period is the overriding cause of the current conditions, livestock should be forced to take the blame and the area should be closed to livestock grazing as specified in CFR 4710.5.

Secondly, the establishment of the AML is based on monitoring that occurred during and after the time when illegal trespass grazing occurred. Therefore, it is unfair to make a hard decision which adversely affects the horses since, had the trespass not occurred, the monitoring data would have reflected a totally different picture.

We also protest the revision of the Antelope HMAP to reflect a new AML for the aforementioned reasons.

If our protest is ignored and horses are to be reduced, then horses should also be reduced proportionately over five years, the same as livestock.

Gerald M. Smith
April 27, 1990
Page 2

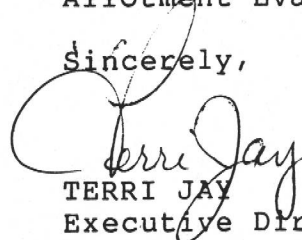
Otherwise, ALL of the horses above AML will be reduced while only a small portion of the livestock is reduced the first year and then monitoring data will show an increase in available forage, and livestock will not be further reduced. And of course, the AML for horses would not proportionately increase.

The situation must be fair and equitable.

Your proposed decision did not address a concern that I raised in my comments (dated 7/28/89), on the Allotment Evaluation regarding the ROD. The ROD states that if additional forage is made available, the split will be 70% livestock, 30% for big game. I asked, "What are horses, livestock or big game?" This is another reason why I protest this decision due to the fact that horses will not receive any increase in available forage should it become available.

I thank you for the opportunity to participate in the Allotment Evaluation Process.

Sincerely,



TERRI JAY
Executive Director