

6-20-96



# 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:

IN REPLY REFER TO:

4130 (NV-047)

(SEE ATTACHED LIST)

JUN 20 1996

Dear Participant:

Enclosed for your information is the Management Action Selection Report (MASR) for the Cove Allotment. This report is included with the Proposed Multiple Use Decision (PMUD).

The Management Action Selection Report is the final section of the allotment evaluation and completes the monitoring evaluation process. It addresses the primary concerns received from interested publics, 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 identifies selected changes in management required to meet or make progress towards allotment specific objectives. The MASR also addresses changes to wild horse management to be included in the Proposed Multiple Use Decision for the allotment.

The MASR is provided for your information only. The Proposed Multiple Use Decision initiates the chosen actions on-the-ground and specifies the procedures for protest and appeal.

Sincerely,

Hal M. Bybee  
ADM - Renewable Resources

3 Enclosures

1. Management Action Selection Report (7 pp)
2. Proposed Multiple Use Decision w/appendix (~~11~~ pp) (1 map)
3. Address List

9

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MANAGEMENT ACTION SELECTION REPORT  
COVE ALLOTMENT  
EGAN RESOURCE AREA  
Ernest Gubler, Inc.  
(Lou Willfong), Permittee

JUN 20 1996

A. INTRODUCTION

The Cove Allotment Evaluation was conducted in accordance with the direction set forth in Washington Office Instruction Memorandum No. 86-706 and is primarily based on monitoring data collected between 1987 and 1995.

A limited amount of public comment was received pertaining to this allotment evaluation. One comment letter was received from Ernest Gubler, Inc. and one from the Commission for the Preservation of Wild Horses. Copies of the two comment letters can be found in the Cove Allotment evaluation file located in the Ely District Office. All allotment specific comments were considered for incorporation into the final evaluation. A meeting concerning the evaluation was held at the Ely District Office on March 19, 1996. Lou Willfong and Laren Flake attended for Ernest Gubler, Inc. BLM was represented by Bob Brown, Grant Hoggan, and Mark Lowrie. All of Lou's and Laren's questions, concerns, and comments as indicated in their comment letter were discussed in detail. A copy of the Cove Allotment Evaluation will be placed in the allotment evaluation file. The primary concerns expressed on the Cove Allotment are addressed as follows:

The permittee is mainly concerned that wild horses have been allowed to increase in the allotment (and in the entire White River Herd Area) since about 1983 until the present time. Cattle use has remained fairly constant during this same time period. Consequently the permittee felt that the forage resource was not allocated fairly.

In response, BLM recognizes that wild horses have been allowed to increase in the allotment and has based an Appropriate Management Level (AML) for wild horses on their **average use** taken from censuses conducted during the evaluation period. BLM did not base an AML on the most recent census during the evaluation period.

The permittee had a second related concern that perhaps wild horse numbers should be set at the Land Use Plan level of 5 wild horses yearlong (55 AUMs). BLM explained to the permittee that the 5 wild horses was not considered a valid level because of an I.B.L.A. decision in June of 1989. That decision basically required BLM to conduct rangeland monitoring in order to arrive at an Appropriate Management Level for wild horses based on sound monitoring data to maintain a thriving natural ecological balance

among all forage users.

Another comment suggested that there is actually more forage available than the evaluation states, thus cattle should be allocated additional AUMs of forage. In other words, cattle should be allocated a larger increase to permitted use.

In response, BLM has calculated a proper stocking level for livestock and wild horses based upon several years of actual use, climate, and utilization studies in addition to recent ecological status (condition), frequency trend, and observed apparent trend studies. Eight wild horse censuses were conducted during the evaluation period and many wild horse ground observations were recorded. The proper stocking level is well founded.

An additional comment questioned why BLM is managing for perennial grasses and forbs in the winterfat area of the allotment. The permittee thought that perhaps perennial grasses and forbs did not exist in the area as early as 1966.

In response, according to the Soil Conservation Service description for the EULA5/ORHY 028BY013NV range site, the potential vegetative composition is about 30% grasses, 5% forbs, and 65% shrubs. The current composition of the vegetation, as indicated on page 24 of the evaluation, is 92% winterfat and 4% fourwing saltbush at key area C-01 and 93% winterfat at key area C-02. No other species are recorded for the ecological condition studies. Indian ricegrass and bottlebrush squirreltail are present, but infrequent, in portions of the key area of winterfat. BLM thus selected a realistic ecological condition objective of maintaining the key area in a mid (fair) condition, managing for a new season of use which will rest perennial grasses and winterfat during May, and managing in the long term for a 2% component of ricegrass and a 2% component of squirreltail.

The Commission for the Preservation of Wild Horses had four basic comments within their letter as follows:

1. Why were foals counted as adults during census and for the determination of a proper stocking level?
2. Use of the Sneva Yield Index for precipitation flaws the proper stocking level.
3. Weight averaging use pattern mapping data can significantly alter the affect of using raw utilization data in the proper stocking level computations.
4. A genetic viable population of wild horses should be managed for, considering all allotments in the White River Herd Area.

The first three concerns have been expressed in response to numerous allotment evaluations conducted in the Ely District and in other BLM districts throughout the state of Nevada over the past several years. The Commission is mainly concerned with issues of existing policy and has provided no new information that would result in a change to the allotment evaluation. Thorough consideration has been given to these concerns. They are occurring in allotment evaluations in accordance with BLM Nevada policy, and therefore no further discussion of them is provided in this selection report. The Ely District agrees in managing for a genetic viable population in the White River HMA. Although the Cove Allotment evaluation establishes an AML for the allotment, the overall AML for the White River HMA considers all allotments in the HMA and the overall AML for the HMA will be large enough to maintain the genetic integrity of the White River herd. In addition, the opportunity exists for exchange of genetic traits from wild horses from the adjacent Seaman HMA to the south.

Conclusions of the evaluation were based on data collection and comments from the following sources:

1. Range, wildlife, and wild horse monitoring studies files compiled by the Division of Renewable Resources.
2. Input from the permittee, Lou Willfong, in a letter dated 03/12/1996.
3. Input from the Commission for the Preservation of Wild Horses in a letter dated March 4, 1996.
4. Input from the permittee, Lou Willfong and Laren Flake, during a meeting held at the Ely BLM District Office on 03/19/1996.
5. Input from the permittee, Laren Flake, during field tours of the allotment.

#### B. ANALYSIS OF MONITORING DATA

Based on analysis of rangeland monitoring studies, five of nine land use plan objectives are being met, two objectives are partially met, and two objectives are no longer appropriate. Allowable use levels for perennial grasses and winterfat have generally not been exceeded. The winterfat component of the allotment is healthy, vigorous, and underutilized. Increasing use to a more moderate level would stimulate new plant growth and cause winterfat to be in a better competitive position with the abundant annual species of plants present in the allotment. Mule deer and pronghorn antelope objectives are being met.

Ecological condition is in an unacceptable seral stage in portions of the allotment. In the key area of winterfat, the desired condition that can practically be managed for is mid seral (fair) ecological condition. Perennial grasses and native forbs are very infrequent throughout this key area. Soils are generally stable throughout the allotment, without significant wind or water erosion. Livestock distribution is a problem, with much of the key winterfat area being **underutilized**.

#### C. SELECTED MANAGEMENT ACTION

The selected management action is as follows:

##### Cove Allotment

1. Set the stocking rate at 1,544 AUMs for cattle, as indicated by monitoring studies. When cattle are authorized to graze the native range, the gates to the Siberian crested wheatgrass seeding will be kept closed.
2. Establish a wild horse AML of 528 AUMs (42 wild horses yearlong and 10 wild horses for three months) as indicated by monitoring studies.
3. Establish a new season of use as winter/spring (1/01 to 4/30). Because cattle are being increased in the allotment, more dormant season use is necessary and less use needs to be made during the critical growing period of spring. Cattle grazing may be allowed in the month of May if allowable use levels have not been exceeded and it has been determined by the authorized officer that sufficient excess forage is available.
4. The increase in cattle AUMs will be used only in the winterfat areas of the allotment (028BY013NV and 029XY046NV range sites). Water hauling will be **required** to a minimum of two locations in these areas. No additional use will be made in the saline meadow east of the Siberian wheatgrass seeding. The authorized officer may require a specific well to be shutdown to facilitate livestock distribution.
5. Salt and supplements will not be allowed within 1/4 mile of stock waters, or without permission and consultation with the authorized officer or his representative.

##### Rationale

Rangeland monitoring studies and other existing information gathered during the evaluation period support the conclusion that allowable use levels have generally not been exceeded in the Cove Allotment. The new terms and conditions of required water hauling will distribute cattle into the underutilized areas of winterfat, allowing winterfat to be grazed moderately and hold a

competitive position with abundant undesirable species. At the same time, the new season of use ending 4/30 rather than 5/31 will rest forage plants during the critical growth period and will allow progress towards meeting the long term objective of increasing perennial grasses in the key area. The selected management action of establishing an Appropriate Management Level for wild horses would enhance the native range in the western portions of the allotment, allowing for improved production, vigor, cover, and seedling frequency of forage plants, particularly perennial grasses. The selected management actions would also provide for a sustained yield of forage, improve the biodiversity of ecosystems, and allow for the attainment of allotment objectives.

The Cove Allotment will be reevaluated in the future, to determine the effects of the management actions upon the allotment objectives and to determine if additional management actions may be required.

D. GRAZING ADJUSTMENTS

In accordance with 43 CFR 4110.3, 4110.3-1, and 4130.3-1(a), the existing authorized livestock permitted use shall be changed to 1,544 AUMs for cattle, with 2,423 AUMs now placed in historical suspended non-use. This change will be implemented beginning the 1997 grazing year. Changes are as follows:

	<u>AUMs</u>		
	<u>Total</u>	<u>Suspended</u>	<u>Active Preference</u>
From:	3,461	2,423	1,038

	<u>AUMs</u>		
	<u>Historical</u>	<u>Suspended</u>	<u>Permitted Use</u>
To:		2,423	1,544

The new permitted use and grazing schedule will be as follows:

From (Existing permit):

<u>Number</u>	<u>Kind</u>	<u>Period of Use</u>	<u>%Federal</u>	<u>AUMs</u>	
				<u>Active</u>	<u>Susp</u>
350	Cattle	03/01 - 05/29	100	1,038	2,423

To - Native range

<u>Number</u>	<u>Kind</u>	<u>Period of Use</u>	<u>%Federal</u>	<u>AUMs</u>	
				<u>Permitted Use</u>	<u>Hist Susp</u>
391	Cattle	01/01 - 04/30	100	1,544	2,423

#### E. TERMS AND CONDITIONS

The following terms and conditions will be incorporated into the grazing permit.

1. When cattle are authorized to graze the native range, the gates to the Siberian crested wheatgrass seeding will be kept closed.

2. The increase in cattle AUMs will be used only in the winterfat areas of the allotment. Water hauling will be **required** to a minimum of two locations in these areas to allow control of the increased cattle use. No additional use will be made in the Saline meadow east of the Siberian wheatgrass seeding. The authorized officer may require a specific well to be shutdown to facilitate livestock distribution.

3. Salt and supplements will not be allowed within 1/4 mile of stock waters, or without permission and consultation with the authorized officer or his representative.

#### F. LONG TERM SOLUTIONS

The following long term solutions should be implemented. Any projects recommended will be initiated when time, funding, and manpower allows.

Construct an east/west fence in cooperation with Ernest Gubler, Inc. dividing the allotment into two main pastures. Water at Gubler Well would be available for both pastures. This would facilitate better livestock control and thus healthier plant communities.

#### G. FUTURE MONITORING

The Division of Renewable Resources will continue to monitor all existing studies and establish new additional studies as identified in Section VI of the allotment evaluation. This new monitoring data will be collected in the future to provide necessary information for subsequent reevaluations following the decision. The reevaluations are necessary to determine if the allotment objectives are being met under the new grazing management strategies. In addition, the reevaluations will determine if continued or additional adjustments are needed to meet allotment objectives.



JUN 20 1996

**NOTICE OF PROPOSED MULTIPLE USE DECISION  
FOR THE COVE ALLOTMENT**

**BACKGROUND INFORMATION:**

The Resource Management Plan/Environmental Impact Statement and Record of Decision for the Egan Resource Area were issued in September, 1984 and February, 1987, respectively. The Egan Rangeland Program Summary was issued in May of 1988. These documents guide the management of public lands within the Cove Allotment. The Egan Resource Area Record of Decision, dated February 1987, states in pertinent part:

"Monitoring studies will be used to determine if adjustments in livestock numbers are necessary...All vegetation will be managed for those successional stages which would best meet the objective of this proposed plan..." (short term objectives) "Future adjustments in livestock use will be based on data provided through the rangeland monitoring program." (long term objective)

"Implementation [of the range management program] will take place through coordination, consultation, and cooperation. Coordinated resource management and planning is an advisory process that brings together all interests concerned with the management of resources in a given local area (landowners, land management agencies, wildlife groups, wild horse groups, and conservation organizations) and is the recommended public process through which consultation and coordination will take place. Grazing adjustments, if required, will be based upon a combination of reliable vegetation monitoring studies, consultation and coordination, and inventory.

Range management actions for livestock use and wild horse numbers will be based upon data obtained through the monitoring program and will consider recommendations made through the coordinated resource management and planning process. Actions could include, but will not be limited to, change in seasons-of-use, change in livestock numbers, correction of livestock distribution problems, alteration of the number of wild horses, development of range improvements, and taking site-specific measures to achieve improvements in wildlife habitat."

Monitoring data has been collected for this allotment periodically since 1987. In accordance with Bureau policy and regulations, this data has been analyzed and evaluated in order to determine progress in meeting management objectives for the Cove Allotment. Input was received from the permittee and the Commission for the Preservation of Wild Horses. See Appendix I for the land use plan objectives covering livestock, wild horses, and wildlife. These objectives are in conformance with and formulated to accomplish the Egan Resource Management Plan

multiple use objectives as they relate to all grazing use on the Cove Allotment.

**BASED UPON THE EVALUATION OF MONITORING DATA FOR THE COVE ALLOTMENT, RECOMMENDATIONS FROM DISTRICT STAFF, AND INPUT RECEIVED THROUGH CONSULTATION, COORDINATION, AND COOPERATION FROM THE PERMITTEE AND PUBLIC INTEREST GROUPS, THE PROPOSED DECISION IS AS FOLLOWS:**

The analysis of monitoring data has revealed that the multiple use objectives for the Cove Allotment are being met with the existing use by livestock, wild horses, and wildlife. Therefore, this decision proposes an increase in livestock use but no change in wildlife use. This decision also establishes the appropriate management level for wild horses.

**LIVESTOCK MANAGEMENT DECISION**

In accordance with 43 CFR 4110.3, 4110.3-1, and 4130.3-1(a), the existing authorized permitted use shall be changed from 1,038 AUMs permitted use to 1,544 AUMs permitted use, with 2,423 AUMs placed in historical suspended non-use. This change will become effective beginning with the 1997 grazing year. Permitted use for the permittee will be as follows:

From (Existing permit):

<u>Number</u>	<u>Kind</u>	<u>Period of Use</u>	<u>%Federal</u>	<u>AUMs</u>	
				<u>Active</u>	<u>Susp</u>
350	Cattle	03/01 - 05/29	100	1,038	2,423

To - Native Range

<u>Number</u>	<u>Kind</u>	<u>Period of Use</u>	<u>%Federal</u>	<u>AUMs</u>	
				<u>Permitted Use</u>	<u>Hist Susp</u>
391	Cattle	01/01 - 04/30	100	1,544	2,423

In accordance with 43 CFR 4130.3-2, the following terms and conditions will be included in the grazing permit for the Cove Allotment:

1. When cattle are authorized to graze the native range, the gates to the Siberian crested wheatgrass seeding will be kept closed.
2. The increase in cattle AUMs will be used only in the winterfat areas of the allotment. Water hauling will be **required** to a minimum of two locations in these areas. No additional use will be made in the Saline meadow east of the Siberian wheatgrass seeding. The authorized officer may require a specific well to

be shutdown to facilitate livestock distribution.

3. Salt and supplements will not be allowed within 1/4 mile of stock waters, or without permission and consultation with the authorized officer or his representative.

RATIONALE:

Rangeland monitoring studies and other existing information collected during the evaluation period support the conclusion that allowable use levels have generally not been exceeded in the Cove Allotment. Large areas of accessible, underutilized forage are present. The new terms and conditions of required water hauling will distribute cattle into the underutilized areas of winterfat, allowing winterfat to be grazed moderately and hold a competitive position with abundant undesirable species. At the same time, the new season of use ending 4/30 rather than 5/31 will rest forage plants during the critical growth period and will allow progress towards meeting the long term objective of increasing perennial grasses in the key area.

Future reevaluations will consider existing and future monitoring data to determine if adjustments or additional modifications in management will be necessary.

AUTHORITY: The authority for this decision is contained in Title 43 of the Code of Federal Regulations, which states in pertinent part:

4100.0-8: "The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b)."

4110.3: "The authorized officer shall periodically review the grazing preference specified in a grazing permit or grazing lease and may make changes in the grazing preference status. These changes shall be supported by monitoring, as evidenced by rangeland studies conducted over time, unless the change is either specified in an applicable land use plan or necessary to manage, maintain or improve rangeland productivity."

4110.3-1: "Additional forage may be apportioned to qualified applicants for livestock grazing use consistent with multiple use management objectives."

4120.3-1(c): "The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under 4130.6-2 of this title."

4130.3: "Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve the management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management."

4130.3-1(a): "The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment."

4130.3-2: "The authorized officer may specify in grazing permits and leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands..."

#### **PROTEST**

Any applicant, permittee, lessee or other affected interest may protest the livestock grazing portion of this proposed multiple use decision under Sec. 43 CFR 4160.1, in person or in writing to Hal Bybee, Assistant District Manager - Renewable Resources, Ely District Bureau of Land Management, HC 33 Box 33500, Ely, Nevada 89301 within 15 days after receipt of such decision. The protest, if filed, should clearly and concisely state the reason(s) as to why the proposed decision is in error.

Subsequent to the protest period, a final multiple use decision will be issued specifying the appeal procedures.

**WILD HORSE AND BURRO MANAGEMENT DECISION**

It has been determined through monitoring that a thriving natural ecological balance will be achieved by maintaining wild horse numbers at the following appropriate management level:

<u>Allotment</u>	<u>Herd Management Area</u>	<u># Animals</u>	<u>AUMs Yearlong</u>
Cove	White River	42	498
Cove	White River	10*	<u>30*</u>
Total AUMs.....			528

\* The second line of this table is that portion of the appropriate management level representing use by 10 wild horses for three months. This level corresponds to the level of 10 wild horses for nine months set for the Red Mountain Use Area of the Duckwater Allotment by decision in June, 1995 (The Red Mountain Use Area is immediately west of the Cove Allotment).

This decision establishes a range of plus or minus 15% or 36 to 48 wild horses yearlong and 8 to 12 wild horses for three months within the Cove Allotment. The setting of wild horse numbers by allotment is part of a process that provides for an overall Herd Management Area (HMA) wild horse AML. Wild horse removals will occur on an HMA basis and numbers will be maintained at or near the total AML. Numbers within allotments may be higher or lower than the numbers identified above because of seasonal movements but the total AML for the HMA will be maintained.

In accordance with 43 CFR 4700.0-6(a), wild horse use on the Cove Allotment will be managed at 528 AUMs plus or minus 15% (449 to 607 AUMs).

In accordance with 43 CFR 4720.1, in the future, all wild horses in excess of the appropriate management level of 42 animals yearlong and 10 animals for three months will be removed down to the lower limit of the range of 36 to 48 animals yearlong and 8 to 12 animals for three months and allow numbers to grow up to the upper limits of the range (48 animals yearlong and 12 animals for three months).

**RATIONALE:** The analysis and interpretation of available monitoring data indicates that the multiple use objectives for wild horses on the Cove Allotment are being met. Wild horses have been allowed to increase from one censused wild horse in the entire White River Herd Management Area in 1983 to approximately 300 wild horses currently (9/95 census). No gather of the White River Herd has ever occurred. Because of this, forage was allocated to wild horses based upon their average use in the Cove Allotment over the six years for which there is utilization data. Based upon 25.5% average actual forage use by wild horses during

those six years, 25.5% of the proper stocking level of 2,072 AUMs, which is 528 AUMs, is allocated to wild horses. Establishing an Appropriate Management Level for wild horses would enhance the native range in the western portions of the allotment, allowing for improved production, vigor, cover, and seedling frequency of forage plants, particularly perennial grasses.

**AUTHORITY:** The authority for this decision is contained in Sec.3(a) and (b) of the Wild Free-Roaming Horse and Burro Act (P.L. 92-195) as amended and in Title 43 of the code of Federal Regulations, which states in pertinent parts:

4700.0-6(a): "Wild horses and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat."

4700.0-6(d): "In administering the regulations, the authorized officer shall consult with the Federal and State wildlife agencies and all other affected interests, to involve them in planning for and management of wild horses and burros on the public lands."

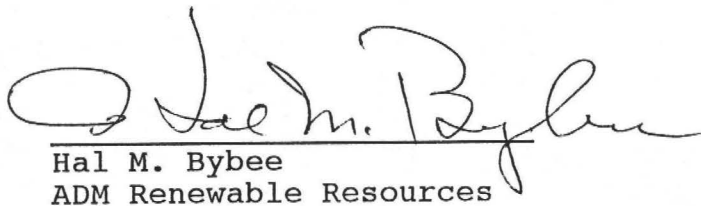
4710.1: "Management activities affecting wild horses and burros, including the establishment of herd management areas, shall be in accordance with approved land use plans prepared pursuant to Part 1600 of this title."

4710.3-1: "Herd management areas shall be established for the maintenance of wild horse and burro herds. In delineating each herd management area, the authorized officer shall consider the appropriate management level for the herd, the habitat requirements of the animals, the relationships with other uses of the public and adjacent private lands, and the constraints contained in 4710.4. The authorized officer shall prepare a herd management area plan, which may cover one or more herd management areas."

4710.4: "Management of wild horses and burros shall be undertaken with the objective of limiting the animals' distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans."

4720.1: "Upon examination of current information and a determination by the authorized officer that an excess of wild horses or burros exists, the authorized officer shall remove the excess animals immediately..."

PROTEST: Although the 4700 regulations allow for an appeal with no mention of a protest, for the purpose of consistency with the livestock management portion of this decision, the entire multiple use decision is initially being sent as a "Proposed" decision. If you wish to protest this decision, in whole or in part, you are allowed (15) days from receipt of this notice within which to file a protest with the Assistant District Manager for Renewable Resources, HC 33 Box 33500, Ely, Nevada 89301-9408. Subsequent to the protest period, a final decision will be issued, regardless of whether or not any protests were received. The final decision may be modified in light of pertinent information brought forth during the protest period.



Hal M. Bybee  
ADM Renewable Resources

APPENDIX I: Land Use Plan/Rangeland Program Summary Objectives

1. Land Use Plan (RMP) Objectives

- (a) Rangeland Management - All vegetation will be managed for those successional stages which would best meet the objective of this proposed plan. (Egan Resource Area Record of Decision, p. 3)
- (b) Wild Horses and Burros - Wild horses will be managed at a total of 20 animals within the White River HMA. (Egan Resource Area Record of Decision, p. 6).\*

" Future adjustments to wild horse numbers will be based on data provided through the rangeland monitoring program." (Egan ROD, p. 6). Actual wild horse numbers will be determined by this evaluation based upon monitoring data in order to maintain a thriving natural ecological balance and prevent deterioration of the range.

\* The 20 wild horses yearlong within the White River HMA is no longer a valid Appropriate Management Level (AML). The Interior Board of Land Appeals June 7, 1989 decision (IBLA 88- 591, 88-638, 88-648, 88-679) ruled in part: "An AML established purely for administrative reasons because it was the level of wild horse use at a particular point in time cannot be justified under the statute." The IBLA further ruled that the AML must be established through monitoring "in terms of the optimum number which results in a thriving natural ecological balance and avoids deterioration of the range."

- (c) Wildlife - Habitat will be managed for "reasonable numbers" of wildlife species as determined by the Nevada Division of Wildlife (NDOW) (Egan ROD, p. 6).

"Reintroductions of big game species will be accomplished in cooperation with the Nevada Department of Wildlife, where such reintroductions would not conflict with existing uses and if sufficient forage is available." (Egan ROD, p. 6)

"Forage will be provided for "reasonable numbers" of big game as determined by the Nevada Department of Wildlife." (Egan ROD, p. 8)

- (d) Watershed - "Establish utilization limits to maintain watershed cover, plant vigor and soil fertility in consideration of plant phenology, physiology, terrain, water availability, wildlife needs, grazing systems and aesthetic values." (Egan ROD, p. 44)



## 2. Rangeland Program Summary Objectives

### Range

- a. Provide forage for up to 1,038 AUMs of livestock use.
- b. Maintain the seeding in the current condition or better. Maintain or enhance native vegetation with utilization not to exceed Nevada Rangeland Monitoring Handbook (NRMH) levels on key species. Maintain or improve the current ecological condition of the native range.

### Wild Horses

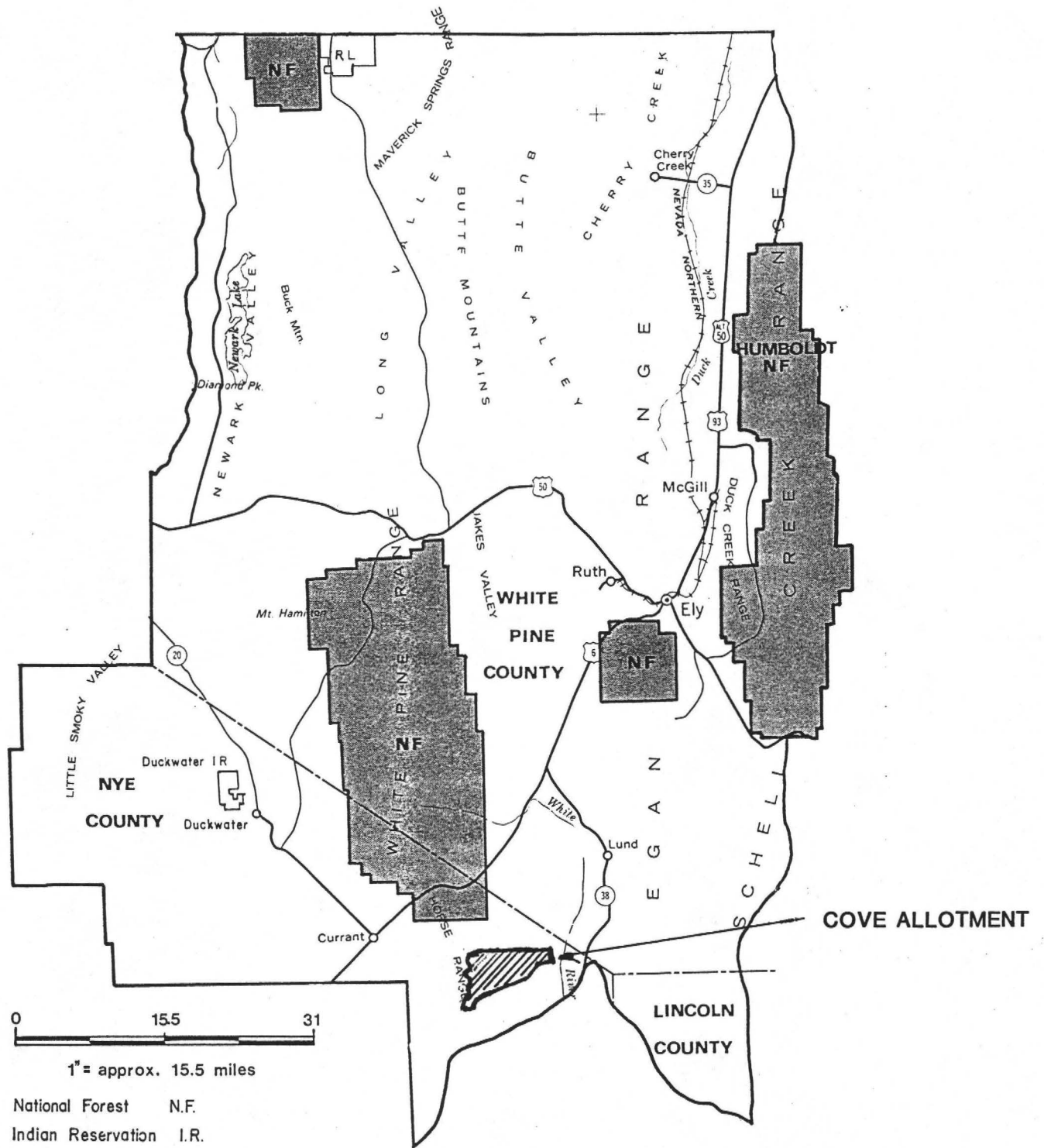
- c. "Initially manage rangeland habitat to support an Appropriate Management Level (AML) of 5 wild horses in the Cove Allotment as part of the White River HMA. Provide forage for up to 55 AUMs of wild horse use." (The AML of 5 wild horses identified in the RPS is no longer a valid AML - See asterisk note on page 9 for reasons why).

### Wildlife/Riparian

- d. "Manage rangeland habitat and forage condition to support reasonable numbers of wildlife, as follows: Mule deer 159 AUMs, Pronghorn antelope 6 AUMs."
- e. "Maintain mule deer spring habitat in good or better condition."

In addition to the above objectives the RPS identified the Cove Allotment as a potential antelope reintroduction area.

# MAP A ALLOTMENT LOCATION WITHIN THE RESOURCE AREA



COVE ALLOTMENT

**EGAN R.A.**  
**ELY DISTRICT**  
 BUREAU OF LAND MANAGEMENT  
 U. S. DEPARTMENT OF THE INTERIOR

NOTICE OF PROPOSED MULTIPLE USE DECISION  
FOR THE COVE ALLOTMENT

JUN 20 1996

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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Wayne Stephens  
P.O. Box J  
Eden, TX 76837

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Gracian Uhalde  
P.O. Box 88  
Ely, NV 89301

Z 425 081 729

Nevada Division of Wildlife  
Region II  
1375 Mountain City Hwy.  
Elko, NV 89801

Z 425 081 730

U.S. Fish & Wildlife Service  
Reno Field Station  
4600 Kietzke Lane, Bldg. C-125  
Reno, NV 89502

Z 425 081 731

The Wilderness Society  
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San Francisco, CA 94105

Z 425 081 732

Animal Protection Institute of America  
2831 Fruitridge Road  
P.O. Box 22505  
Sacramento, CA 95822

Z 425 081 733

N-4 Grazing Board  
c/o Bill Davidson  
P.O. Box 1077  
McGill, NV 89318

Z 425 081 734

Rose Strickland  
Sierra Club  
Toiyabe Chapter  
P.O. Box 8096  
Reno, NV 89507

Z 425 081 735

Nevada Farm Bureau  
1300 Marietta Way  
Sparks, NV 89431

Z 425 081 736

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RETURN RECEIPT REQUESTED

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COMMISSION FOR THE  
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July 28, 1996

Mr. Hal M. Bybee  
Ely District  
Bureau of Land Management  
HC 33 Box 33500  
Ely, Nevada 89301-9408

Subject: Cove Selection Report - White River HMA

Dear Mr. Bybee:

Thank you for consulting the Commission concerning the Management Selection Report - Cove Allotment. Issues directed at the allotment evaluation are similar to other allotment evaluations prepared the Eagan Resource Area. In order to better understand these concerns we offer several comments.

The Action Selection Report provides no opportunity for selection of alternatives, for there were no alternatives. Our previous input allowed for the assessment of another management alternative.

Issues brought by the Commission are real issues. These issues have been presented to other BLM Resource Areas, we have been surprised with dramatically different responses from BLM Districts. Therefore, we assume your conclusions are supported by specific BLM Policy maybe in error. For example, we have Consent Orders that agree that weight averaging use pattern mapping data, where production and utilization is not uniform, is contrary to existing BLM Manuals. This issue now stands before IBLA in the appeal of the Buffalo Hills Allotment Final Multiple Use Decision.

While it may be your professional judgement that any number or composition of wild horses are a genetic viable population, you provide no data or literature to support your conclusion. Perhaps this issue will be addressed in the environmental assessment for the gather plan.

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It is encouraging that most objectives have been met and additional forage are available for livestock. We could not determine what percentage of wild horses had to be removed to provide for this new use or how it would lead to better management of the range.

We would hope the re-organization of the BLM renewable resources would provide more uniform approaches to resource management decisions. In time, we will resolve our issues and hopefully influence these procedures throughout Nevada.

Sincerely,



CATHERINE BARCOMB  
Executive Director