



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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

3-6-96
TAKE
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AMERICA

IN REPLY REFER TO:

4130 (NV-046)

MAR 06 1996

Bruce Jensen
Sunnyside Ranch
P.O. Box 253
Lund, Nevada 89317

CERTIFIED MAIL NO. Z 425 081 590
Return Receipt Requested

Chet Johnson
Sunnyside Ranch
P.O. Box 157
Lund, Nevada 89317

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Wayne Stevens
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NOTICE OF FINAL MULTIPLE USE DECISION FOR THE SUNNYSIDE AND HARDY SPRINGS ALLOTMENTS

BACKGROUND INFORMATION:

The Management Framework Plan and the Record of Decision for the Schell Grazing Environmental Impact Statement were issued in June and July of 1983, respectively. These documents guide the management of public lands within the Sunnyside and Hardy Springs Allotments. The Schell Resource Area Record of Decision dated July 1983 states in pertinent part:

"When adequate monitoring data becomes available adjustments to the grazing capacity will be made that are compatible with the multiple use objectives...

Implementation of the range management program will take place through monitoring and consultation and coordination with all interests concerned with the management of resources in a given local area; landowners, land management agencies, wildlife groups, wild horse groups, conservation organizations, etc. Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies, consultation and coordination, baseline inventory, or a combination of these...

Prior to initiating grazing adjustments, the Bureau, within the guidance of the Management Framework Plan and consultation and coordination, will consider the specific management objectives for an allotment and other resource values (e.g., riparian habitat, water quality,

wildlife, recreation, wild horses and livestock) to be evaluated in determining progress in meeting these objectives. Changes in the resource values may warrant a modification of the scheduled adjustments and thus indicate the intensity and types of monitoring that will be required in each allotment..."

Monitoring studies were initially established in 1982 and have been conducted since that time. 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 Sunnyside and Hardy Springs Allotments. See the Appendices for the multiple use objectives. Input was received from the permittees, Nevada Division of Wildlife, Resource Concepts Inc., and State of Nevada Commission for the Preservation of Wild Horses.

Appendices I through IV show the management objectives for livestock, wild horses, and wildlife on the allotments. These objectives are in conformance with and formulated to accomplish the Schell Land Use Plan multiple use objectives as they relate to all grazing use on the Sunnyside and Hardy Springs Allotments. The permitted use specified in this decision will continue to be monitored to measure achievement of management and resource objectives for the public lands in these allotments.

THEREFORE, BASED UPON THE EVALUATION OF MONITORING DATA FOR THE SUNNYSIDE AND HARDY SPRINGS ALLOTMENTS, RECOMMENDATIONS FROM DISTRICT STAFF, INPUT RECEIVED THROUGH CONSULTATION, COOPERATION, AND COORDINATION WITH THE PERMITTEE, AND PUBLIC INTEREST GROUPS, THE FINAL DECISION IS AS FOLLOWS:

The analysis of monitoring data has revealed that three of the eight multiple use objectives for the Sunnyside Allotment and two of seven on Hardy Springs Allotment are not being met under the existing management practices; therefore, implementation of management actions and adjustments to livestock and wild horses are necessary to meet these objectives. Allowable use levels for the key species selected for specific use areas on the allotment have been exceeded; use pattern data indicates poor distribution of livestock and wild horses, and long term studies data show static and downward trends of the range sites. Livestock and wild horse grazing contributed to the high use levels recorded on the Sunnyside and Hardy Springs Allotments. Grazing use is adjusted to allow for short term (allowable use level) objectives and associated long term objectives to be met. These adjustments would initiate the required improvement of rangeland conditions. Wildlife use is not contributing to the non attainment of multiple use objectives.

LIVESTOCK MANAGEMENT DECISION

In accordance with 43 CFR 4110.3, 4110.3-2(b) and 4130.3-1(a) the authorized livestock permitted use shall be changed as follows:

Based on adjustments in season of use and reduction in livestock numbers, the following permitted use will become effective on April 1, 1996.

SUNNYSIDE ALLOTMENT

From:	<u>Total</u>	<u>Suspended</u>	<u>Active Preference</u>
	8,787	0	8,787

To:	<u>Permitted Use</u>
	5,402

Permitted livestock use effective 6/01/96 will be as follows:

<u>Livestock No.</u>	<u>Kind</u>	<u>Period of Use</u>	<u>% PL</u>	<u>Active Use</u>
539	Cattle	6/01-3/31	100	5,402

HARDY SPRINGS ALLOTMENT

From:	<u>Total</u>	<u>Suspended</u>	<u>Active Preference</u>
	5,762	16	5,746

To:	<u>Permitted Use</u>	Historical <u>Suspended</u>
	3,478	16

Permitted livestock use effective 4/01/96 will be as follows:

<u>Livestock No.</u>	<u>Kind</u>	<u>Period of Use</u>	<u>% PL</u>	<u>Active Use</u>
499	Cattle	10/16-5/15	100	3,478

In accordance with 43 CFR 4130.3-2, the following terms and conditions are hereby made a part of the grazing permit, for the Sunnyside and Hardy Springs Allotments effective April 1, 1996:

1. Grazing on the Sunnyside Allotment will be in accordance with the deferred rotational grazing system as outlined below for cattle with a season of use from 6/01 to 3/31.

A 06/01 - 08/20 **D** 06/01 - 09/18
B 08/21 - 12/09 **E** 09/19 - 12/09
C 12/10 - 03/31 **F** 04/01 - 05/31

YEAR	NORTH	SOUTH	CAVE VALLEY	REST
1	C	B	A	F
2	C	D	E	F
3	B	C	A	F
4	D	C	E	F
5	SAME AS YEAR 1			

2. To improve livestock distribution, mineral block and/or salt block will be placed a minimum distance of 1/2 mile from water, increase livestock movement by herding.
3. Livestock on the Hardy Springs Allotment will be removed from the winterfat areas by April 10 of each year through water management and herding. The livestock will be allowed to drift towards the private meadows until no later than May 15.
4. Certified actual use report by use area and pasture is due 15 days after the end of the authorized grazing period.

SHEEP

Sheep will continue to be trailed on the west side of State Route 318 to Gap Mountain, but then will be trailed along the west bench of Gap Mountain 2 miles, then east through the pass (T.5 N., R.62 E., Sec. 18) to the Fox Mountain Allotment. Authorization to trail east of State Route 318 is no longer authorized.

"RESERVED FOR WILDLIFE" ALLOTMENT

The "Reserved for Wildlife" Allotment will be split between Hardy Springs and Forest Moon Allotments. This will prevent livestock drift between the two allotments and will prevent unauthorized use of the "Reserved for Wildlife" Allotment. The "Reserved for Wildlife" Allotment is not used by wildlife but is used by cattle from both adjacent allotments.

TRANSFER APPLICATION DECISION

On November 2, 1995 Bruce Jensen submitted a transfer application requesting that Chet Johnson's grazing privileges for the Sunnyside, Hardy Springs, and Shingle Pass Allotments be transferred to him. After considering the livestock management decision and the transfer application, Chet Johnson to Bruce Jensen, my decision is to approve the transfer as follows:

Sunnyside

Permitted use will be as follows:

Permitted Use
5,402

Hardy Springs

Permitted use will be as follows:

Permitted Use
3,478

Shingle Pass

Permitted use will be as follows:

Permitted Use
2,724

RATIONALE: The analysis and evaluation of available monitoring data indicates that the current stocking rate and management practices must be modified to meet the multiple use management objectives for the Sunnyside and Hardy Springs Allotments as identified in the Appendices. The data indicates that on the Sunnyside Allotment 5,402 AUMs are available for livestock, and that active preference is 3,385 AUMs in excess of the livestock carrying capacity. The data indicates that on the Hardy Springs Allotment 3,478 AUMs are available for livestock, and that permitted use is 2,284 AUMs in excess of the livestock carrying capacity. Since livestock are contributing to the non attainment of multiple use objectives on the allotment, livestock are being reduced. The prescribed adjustments in stocking rates, grazing practices and increased intensity of management will initiate the accomplishment of the multiple use objectives. These actions are necessary to improve the natural ecological balance of the area's vegetative resources for all users by improving plant diversity in plant communities. In addition these actions could increase desirable plant species in the area.

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

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 permitted use specified in a grazing permit or grazing lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer."

4110.3-2(b): "When monitoring or field observations show 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 utilization or, when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory or other acceptable methods, the authorized officer shall reduce permitted grazing use or otherwise modify management practices."

4110.3-3(a): "After consultation, cooperation and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, and the interested public, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer..."

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, and to ensure conformance with the provisions of subpart 4180 of this part."

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 or 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..."

APPEAL:

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final livestock grazing portion of this decision may file an appeal and petition for stay of the decision pending final determination on appeal. The appeal and petition for stay must be filed in the office of the authorized officer as noted above, within 30 days following receipt of the final decision.

The appeal shall state the reasons, clearly and concisely, why the appellant thinks the final decision is in error.

Should you wish to file a motion for stay, the appellant shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

As noted above the petition for stay must be filed in the office of the authorized officer.

WILD HORSE AND BURRO MANAGEMENT PROPOSED DECISION

Manage wild horses at the appropriate management levels (AML) of 207 AUMs (17 horses) on the Sunnyside Allotment in the Seaman Herd Management Area (HMA). Manage wild horses at the AML of 286 AUMs (24 horses) on the Hardy Springs Allotment in the White River HMA. These AMLs have been determined to be the optimum level to maintain a thriving natural ecological balance and prevent deterioration of the range.

AML will remain at 17 horses $\pm 15\%$ for the Sunnyside Allotment and 24 horses $\pm 15\%$ for Hardy Springs Allotment unless further monitoring data indicates a change is necessary.

Setting wild horse numbers by allotment will eventually provide a total AML for an entire HMA. Removals will occur on a HMA basis and numbers will be maintained at or near the total AML. Numbers within use areas and/or 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 Sunnyside Allotment shall be managed at 207 AUMs or 17 horses yearlong. Wild horse use on the Hardy Springs Allotment shall be managed at 286 AUMs or 24 horses yearlong.

In accordance with 43 CFR 4720.1, all wild horses in excess of the appropriate management level for the HMAs will be removed.

Monitoring will continue to ensure that AMLs are maintaining a thriving natural ecological balance.

RATIONALE: The analysis and evaluation of available monitoring data indicates that a change in management actions for wild horses is needed to meet multiple use management objectives on the Sunnyside and Hardy Springs Allotments as identified in the Appendices. The data indicates there is 207 AUMs of forage available for wild horses on the Sunnyside Allotment in the Seaman HMA, and 286 AUMs on the Hardy Springs Allotment in the White River HMA.

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."

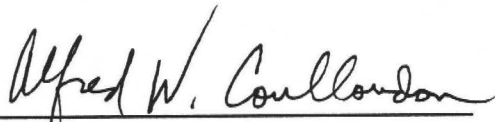
4710.4: "Management of wild horses and burros shall be undertaken with the objective of limiting the animals' distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans."

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..."

APPEAL:

Within 30 days of receipt of this decision, you have the right of appeal to the Board of Land Appeals, Office of Secretary, in accordance with the regulations at 43 CFR 4.4. If an appeal is taken, you must follow the procedures outlined in the enclosed form 1842-1, Information on Taking Appeals to the Board of Land Appeals. Within 30 days after you appeal, you are required to provide a Statement of Reasons to the Board of Land Appeals and a copy to the Regional Solicitors Office listed in Item 3 on the form. In addition, please provide this office with a copy of your Statement of Reasons. Copies of your appeal and the Statement of Reasons must also be served upon any parties adversely affected by this decision. The appellant has the burden of showing that the decision appealed from is in error.

In addition, within 30 days of receipt of this decision, you have the right to file a petition for a stay (suspension) of the decision together with your appeal, in accordance with the regulations at 43 CFR 4.21. The petition must be served upon the parties specified above. The appellant has the burden of proof to demonstrate that a stay should be granted.



Alfred W. Coulloudon, Manager
Schell Resource Area

(Certified Mail No.)

Nevada Division of Wildlife, Region II	(Z 425 081 597)
Nevada Division of Wildlife, Region III	(Z 425 081 598)
Kraig Beckstrand	(Z 425 081 599)
Mike Podborny	(Z 425 081 600)
U.S. Fish and Wildlife Service	(Z 425 081 596)
Resource Concepts, Inc.	(Z 425 081 607)
Nevada State Grazing Board, N-4	(Z 425 081 606)
Natural Resources Defense Council	(Z 425 081 614)
Animal Protection Institute of America	(Z 425 081 611)
Sierra Club, Toiyabe Chapter	(Z 425 081 615)
Nevada Cattlemen's Association	(Z 425 081 605)
Commission for the Preservation of Wild Horses	(Z 425 081 609)
Nevada Farm Bureau Federation	(Z 425 081 619)
Marvel and Hansen	(Z 425 081 616)
Lincoln County Commissioners	(Z 425 081 603)
Alan Chamberlain, Lincoln County Commissioner	(Z 425 081 602)
Wild Horse Organized Assistance	(Z 425 081 608)
Nevada Outdoor Recreation Association	(Z 425 081 612)
Nevada Outdoor Recreation Association	(Z 425 081 613)
International Society for Protection Of Mustangs and Burros	(Z 425 081 610)
Lincoln County Public Lands Commission	(Z 425 081 601)
Nye County Commissioners	(Z 425 081 604)
Patrick Bates Land Company	(Z 425 081 595)
Gary Sprouse	(Z 425 081 592)
Edie Wilson	(Z 425 081 617)
White Pine County Commisssioners	(Z 425 081 618)

APPENDIX I

Sunnyside Allotment Specific Objectives

a. Livestock

- (1) The short term objective will be accomplished through managing the allowable use levels (AUL) by season of use to improve or maintain the desired vegetation community (Appendix II).
- (2) The long term objective is to improve those acres in poor or fair livestock forage condition and maintain all acres presently in good livestock forage condition by managing for those seral stages which optimize livestock forage production (Appendix II).

b. Wild Horses

- (1) The short term objective will be accomplished through managing the allowable use level (AUL) by season of use to improve or maintain the desired vegetative community (Appendix II).
- (2) The long term objective is to manage for the appropriate seral stage to provide desired quantity, quality, and variety of forage in order to meet the requirements of the wild horses (Appendix II).

c. Mule Deer

- (1) The short term objective is to limit yearlong use on key perennial grasses, grass-like plants, and forbs to 55 percent by all users, and to 45% for key shrubs.
- (2) The long term objective is to maintain mule deer range in at least fair habitat condition by providing diversity of forage species.

d. Elk

- (1) The short term objective is to limit yearlong use on key perennial grasses, grass-like plants, and forbs to 55 percent by all users, and to 45% for key shrubs.
- (2) The long term objective is to manage for the most appropriate seral stage to provide the desired quantity, quality, and variety of forage in order to meet the requirements of elk.

e. Pronghorn Antelope

- (1) The short term objective is to limit yearlong use on key perennial grasses, grass-like plants, and forbs to 55 percent by all users, and to 45% for key shrubs.
- (2) The long term objective is to maintain antelope range in at least fair habitat condition by providing appropriate vegetation quantity and quality.

f. Desert Bighorn Sheep

- (1) The short term objective will be accomplished through managing the allowable use level (AUL) by season to improve or maintain the desired vegetation community.
- (2) The long term objectives are to manage for the most appropriate seral stage to provide the desired quantity, quality, and variety of forage in order to meet the requirements of bighorn sheep.

g. Riparian Areas

- (1) The short term objective is to limit use on wet meadows to 30-50 percent for grass and grass-like species, and 45 percent for shrubs by all animals yearlong.
- (2) The long term objective is to manage all wet meadows for late seral stage (80-85 percent grass and grass-like plants, 10-15 percent forbs, and 5 percent shrubs).

h. Wilderness Areas

- (1) The short term objective is to maintain/improve the current vegetation within the wilderness study area to provide future wilderness values and biodiversity.
- (2) The long term objective is to manage the vegetative community to enhance or restore the natural ecosystem.

APPENDIX I (cont.)

Hardy Springs Allotment Specific Objectives

a. Livestock

- (1) The short term objective will be accomplished through managing the allowable use levels (AUL) by season of use to improve or maintain the desired vegetation community (Appendix III).
- (2) The long term objective is to improve those acres in poor or fair livestock forage condition and maintain all acres presently in good livestock forage condition by managing for those seral stages which optimize livestock forage production (Appendix III).

b. Wild Horses

- (1) The short term objective will be accomplished through managing the allowable use level (AUL) by season of use to improve or maintain the desired vegetative community (Appendix III).
- (2) The long term objective is to manage for the appropriate seral stage to provide desired quantity, quality, and variety of forage in order to meet the requirements of the wild horses (Appendix III).

c. Mule Deer

- (1) The short term objective is to limit use on key browse species listed for mule deer to 30 percent by livestock and wild horses prior to November 1, and to 45 percent by all animals yearlong (Appendix IV).
- (2) The long term objective is to maintain key deer winter range in at least good habitat condition (Appendix IV).

d. Elk

- (1) The short term objective is to limit yearlong use on key perennial grasses, grass-like plants, and forbs to 55 percent by all users, and to 45% for key shrubs.
- (2) The long term objective is to manage for the most appropriate seral stage to provide the desired quantity, quality, and variety of forage in order to meet the requirements of elk.

e. Pronghorn Antelope

- (1) The short term objective is to limit yearlong use on key perennial grasses, grass-like plants, and forbs to 55 percent by all users, and to 45% for key shrubs.
- (2) The long term objective is to maintain antelope range in at least fair habitat condition by providing appropriate vegetation quantity and quality.

f. Riparian Areas

- (1) The short term objective is to limit use on stream riparian areas to 50 percent utilization for grass and grass-like species, and 45 percent for shrubs by all animals yearlong.
- (2) The long term objectives are to manage all stream riparian areas for late seral stage (exact composition of plant species will be based on the appropriate ecological site for that area).

g. Wilderness Study Areas

- (1) The short term objective is to maintain/improve the current vegetation within the wilderness study area to ensure maintenance or improvement of wilderness values and biodiversity.
- (2) The long term objective is to manage the vegetative community to maintain or allow for recovery of the natural ecosystem.

APPENDIX II
KEY MANAGEMENT OBJECTIVES

ALLOTMENT : SUNNYSIDE (Livestock, Wild Horses & Wildlife)

Study No.	Key Area Location	Ecological Site No. *	Key Species	Key Spp % Comp by Weight	PRESENT SITUATION		LONG TERM OBJECTIVES		SHORT TERM OBJECTIVES	
					Seral Stage (% of PNC)	Maintain or Improve	Seral Stage (% of PNC)**	Allowable Use level ***	Season of Use	
SS01	T. 8 N. R. 62 E. SEC. 32	028BY013NV Silty 8-10	ORHY EULA5	ORHY- 6 GRASS- 7 EULA5- 89 SHRUBS- 93	61 Mid	IMPROVE	ORHY 7-10 EULA5 <89 GRASS >10 FORBS T-2 SHRUBS <89	>61	GRASS-50% FORBS-50% SHRUBS-50%	Year long ****
SS02	T. 4 N. R. 61 E. SEC. 34	029XY008NV SHALLOW CALCAREOUS LOAM 8-12	ORHY STCO ARARN	ORHY- 0 HIJA- 54 ARARN- 3 SHRUBS- 46	20 Early	IMPROVE	ORHY 1-2 HIJA <54 ARARN >5 FORBS 1-2 SHRUBS <46	>26	GRASS-50% SHRUBS-50%	Year long ****
SS03	T. 3 N. R. 62 E. SEC. 16	029XY020NV Silty 5-8	ORHY EULA5	ORHY- T EULA5- 99	70 Mid	IMPROVE	ORHY 1-2 EULA5 <99 GRASS 1-3 FORBS T-2	>70	GRASS-50% FORBS-50% SHRUBS-50%	Year long ****
SSCV02	T. 6 N. R. 64 E. SEC. 19	028BY013NV Silty 8-10	ORHY SIHY EULA5	ORHY- 3 SIHY- 32 EULA5- 65	76 Late	IMPROVE	ORHY >5 SIHY <32 EULA5 60-70 GRASS <32 FORBS T-2 SHRUBS 60-70	75	GRASS-50% FORBS-50% SHRUBS-50%	year long ****

* Ecological Sites listed here can be referred to SCS Ecological Site Descriptions.

** This is the seral stage that would have the greatest value for all resource users (livestock, wild horse and wildlife).

*** Allowable use levels for utilization are the objectives established to meet the long term composition objectives.

**** Season of use for cattle 6/1-3/31, wild horses and wildlife yearlong.

**APPENDIX III
KEY MANAGEMENT OBJECTIVES**

ALLOTMENT : Hardy Springs (Livestock and Wild Horses)

Study No.	Key Area location	Ecological Site No. *	PRESENT SITUATION			LONG TERM OBJECTIVES			SHORT TERM OBJECTIVES	
			Key Species	Key Spp % Comp by Weight	Seral Stage (% of PNC)	Maintain or Improve	Key Spp % Comp By Weight	Seral Stage (% of PNC)**	Allowable Use Levels ***	Season of Use
HSR01	T. 8 N. R. 60 E. SEC 26	028BY013NV Silty 8-10"	EULA5 ORHY SIHY	EULA5-90 ORHY-0 SIHY-1	46	IMPROVE	EULA5 <90 ORHY T-3 SIHY 3-5 GRASS 6-10 FORBS 2-5 SHRUBS <90	>46	GRASS 50% SHRUBS 50%	10/1 - 5/15
HSR02	T. 8 N. R. 60 E. SEC 26	Unknown	EULA5 ORHY SIHY ARARN	No Ecological Status Completed To Date					GRASS 50% SHRUBS 50%	10/1 - 5/15
HSR03	T. 9 N. R. 62 E. SEC 19	028BY011NV SHALLOW CALCAREOUS LOAM 8-10"	ARARN ORHY SIHY	ARARN-80 ORHY-T SIHY-1	36	IMPROVE	ARARN <80 ORHY 3-5 SIHY 3-5 GRASS 3-10 FORB 1-5 SHRUBS <80	>36	GRASS 50% SHRUB 50%	10/1 - 5/15
HSR04	T. 9 N. R. 62 E. SEC 33	028BY011NV SHALLOW CALCAREOUS LOAM 8-10"	ARARN ORHY SIHY	ARARN-57 ORHY-0 SIHY-1	34	IMPROVE	ARARN <57 ORHY 3-5 SIHY 3-5 GRASS 3-10 FORBS 1-5 SHRUBS <57	>34	GRASS 50% SHRUBS 50%	10/1 - 5/15

* Ecological Sites listed here can be referred to SCS Range Site Description for the Central Nevada Basin and Range - Major Land Resource Area 028BY.

** This is the seral stage that would have the greatest value for all resource users (livestock, wild horse and wildlife).

*** Allowable use levels for utilization are the objectives established to meet the long term composition objectives.

APPENDIX IV

ALLOTMENT: HARDY SPRINGS - WILDLIFE OBJECTIVES

				PRESENT SITUATION		LONG TERM OBJECTIVES	SHORT TERM OBJECTIVES	
Study No.	Key Area Location	Ecological Site No.	Key Species	Habitat Condition Rating	Maintain or Improve	Habitat Condition Rating	Allowable Use Level	Season of Use
HSW1 - Lower Perish Spring KDW	T. 7 N., R. 59 E., Sec. 11, NWNE	N/A	COMES EPVI	Good	Maintain	Good	30% 45%	by 11/1 Yearlong

3-19-96

BOB MILLER
Governor

STATE OF NEVADA

CATHERINE BARCOMB
Executive Director



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

255 W. Moana Lane
Suite 207A
Reno, Nevada - 89509
(702) 688-2626

March 19, 1996

Alfred W. Coulloudon
Schell Resource Area
Bureau of Land Management
HC 33 Box 33500
Ely, Nevada 89301-9408

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Subject: FMUD Sunnyside/Hardy Springs Allotments

Dear Mr. Coulloudon,

The Commission for the Preservation of Wild Horses has reviewed the Final Multiple Use Decision for Sunnyside and Hardy Springs Allotments. These allotment specific decisions set portions of appropriate management levels for wild horse herds. There is no evidence that the affected herd will comprise a viable wild horse herd as required by law. We disapprove of this approach to managing wild horse herds.

Methodologies used to establish a carrying capacity and allocate forage to the affected wild horse herds have errors. Where monitoring data were used for annual carrying capacity computations, the mathematic computations did not agree with the conclusions of the allotment evaluations.

We hope that the Final Decision can protect natural resources by enforcing the conditions establishing allowable use levels for key vegetation. The prescribed livestock management system may assist in meeting the vegetational objectives, but no data have been provided to assure the changes in livestock management will achieve these objectives.

Sincerely,

Handwritten signature of Catherine Barcomb in cursive.

CATHERINE BARCOMB
Executive Director