



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

11/12/85
IN REPLY REFER TO:
6000
(NV-047)

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RETURN RECEIPT REQUESTED

Wild Horse Organized Assistance
P.O. Box 555
Reno, Nevada 89504

Dear Members:

Enclosed is an errata for the draft Antelope Range Coordinated Management Plan that you reviewed last spring. Comments were reviewed and appropriate changes were made. We ask you to now review the changes that will eventually be placed in the final document.

We ask that you complete the review of the changes within thirty days from the date stamped on this letter. Please send any comments back to this office in care of the District Manager.

If you have questions, please contact Wayne Lowman, Rita Suminski, or myself at the following address:

Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301
(702) 289-4865

Sincerely yours,

David L. Redmond, Acting Manager
Schell Resource Area

Enclosure

8/16/85

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

AUG 16 1985

Wild Horse Organized Assistance
c/o Mrs. Dawn Lappin
P.O. Box 555
Reno, Nevada 89504

Dear Mrs. Lappin:

Thank you for your letter of April 21, 1985, regarding the Draft Antelope Range Coordinated Management Plan (DARCMP). We will attempt to address the concerns you expressed.

Livestock

Although it is not entirely clear, your first concern appears to be that you feel that the numbers of livestock discussed in the DARCMP are in conflict with the Schell Grazing Environmental Impact Statement.

On page 5 of the Record of Decision for the FEIS, in the section headed The Plan and Implementation, the initial stocking rate for livestock is as follows: "Obtain written agreement to establish the initial stocking rate/the goal of active use being consistent with the 3-year average shown in the EIS... If an agreement cannot be reached then a decision will be issued identifying the data needed and the procedures to be used for arriving at the adjustment in authorized grazing use."

This is addressed in the DARCMP through management objective 11 (pg 22) and in the monitoring portions within individual sections of the document. Stocking level agreements have only been developed for two out of the six allotments involved, Goshute Mountain and Deep Creek. The management plans for these two allotments will be amended to mention these agreements. In the allotments for which stocking level agreements were not obtained, monitoring is done on current years stocking levels.

Your next concern is apparently the use of livestock preference as a management goal of the allotment specific portions of this plan. This is also consistent with the DEIS and in response to concerns formed out of the scoping process. One of the objectives stated in the DEIS is to

maximize livestock based on sustained yield of the forage resource (summary section, page 1, item #4). One of the primary goals in the DARCMP is to provide sufficient resources to maintain maximum sustainable numbers of livestock, wildlife, and wild horses which may or may not equate to preference levels for livestock (refer to General Management Objectives #2 and #11, pages 21 and 22 of the general section).

Monitoring information gathered over the past three to five years was used to determine proposed adjustments in livestock use as well as wild horse use. Where problems were identified with livestock use, changes in seasons of use and/or duration of use were proposed. Where problems were identified with wild horse use, changes in numbers were proposed because we have no control over duration or timing of use made by wild horses. Monitoring data was not the only factor taken into consideration in making this decision. One of the areas specifically targeted for horse removal is in North Spring Valley because the winterfat bottom, upon which the wild horses depend for winter forage, is proposed for vegetative treatment. The treatment would consist of removing big sagebrush and fencing the area temporarily to allow the reestablishment of winterfat and other forage species. Removing wild horses from the area prior to this treatment will minimize the impact on the remaining horses resulting from the temporary unavailability of forage. Once the native species are reestablished and the fence is removed, wild horses will receive the primary benefits from this treatment because livestock will not be making use on the winterfat (refer to the DARCMP, page G1e-9).

All of the proposed management actions, from changes in grazing systems to range improvement implementation, are designed to improve the vegetative resource and thereby benefit all foraging animals. Range improvement projects, which benefits wildlife and wild horses as well as livestock, are paid for almost exclusively out of the grazing fee receipts that are returned to the district especially for this purpose. Some of the projects will also be funded through private sources such as individual livestock operators and the National Mustang Association. These actions are being taken not at the expense of other resources, but for the benefit of all resources.

FORAGE AND RANGE IMPROVEMENTS

The problem you identified involving the number of acres of vegetative conversion discussed in the plan was also identified by others reviewing this document. The acreage figures given in the plan represent the total number of

smaller than the area identified.

The exact size, location, and design of these treatments will not be known until the implementation phase. The majority of vegetative conversions would be accomplished through the sale and harvest of firewood and prescribed burning through natural and/or planned ignitions. Most areas targeted for conversion were chosen because they have sufficient understory to naturally regenerate. Therefore, not all of the areas converted would need to be seeded. The plan will be revised to emphasize this and to state more specifically the acreage expected to be treated. Projects identified as being within the scope of the FEIS will be implemented as funding is available. Projects outside the scope of the FEIS will not be implemented until an amendment is completed which includes a public comment period.

Another misconception which the plan has apparently created is the idea that every acre identified as having potential for treatment must be treated to support preference levels of livestock. It is felt that some vegetative treatments will be necessary in order to achieve one plan objective of supporting maximum sustainable numbers of livestock, wild-life, and wild horses. However, the overall aim of the plan is to try to meet all of the the objectives through implementation of grazing systems and range improvements, as necessary.

For the most part vegetation conversions would be of low priority for implementation. If monitoring determines that resource objectives are being met without all projects being completed, the remaining projects will not be done. For the purpose of analysis it is assumed that all projects identified will be necessary to accomplish the goals of the plan.

RANGELAND DATA

Site specific information on soils, ecological sites, ecological condition, and forage production for the key areas within the plan boundary have been obtained. This data was used to determine specific vegetative objectives for the key areas according to site potential. The management actions proposed in the plan, including grazing systems, were determined necessary to meet these resource objectives. The range improvements are needed to implement the grazing systems and improve distribution of all grazing animals. Water development and vegetative conversions will also be designed to benefit wild horses and wildlife. The projects identified will be implemented in order of priority. Generally, the priority will be waters, fences, and vegetation conversions in that order.

It is recognized that the overall plan area is deficient in forage and water resources to support desired levels of foraging animals. Forage, therefore, is not the only limiting factor. Because of the demand for these resources, this area was identified as the highest priority for implementation of management. The allotments within the M and C categories are included in the plan because they fall within the Antelope Wild Horse Herd Area boundary. In being consistent with our policy, implementation on these allotments is low priority. The fences you mention are allotment boundary fences separating these from adjacent category I allotments.

WILDLIFE

The letter from Mr. Gilbertson was received in 1983 and only outlined concerns to be addressed in the plan. In the letter he stated that reasonable numbers needed to be updated. The reference you cite (GII-28) was a 1984 communication, also from the Nevada Department of Wildlife (NDOW). Therefore, the 1984 figure is correct because it is the most recent.

Studies done by Hansen, et al, were done primarily in Wyoming, New Mexico, and Colorado. One cannot compare the dietary overlap and forage use between such botanically and geographically different areas. A study by Jo Meeker entitled "Interactions Between Pronghorn Antelope and Feral Horses in Northwestern Nevada", a more appropriate reference, states that "the removal of one horse would make additional forage available sufficient for 0.939 (or 1) pronghorn. "(Page 576, paragraph 7.)

By following mitigating measures developed in cooperation with NDOW, old seedings can be rehabilitated while still providing for wildlife useage. For example, patches and stringers of sagebrush could be left intact to preserve sagegrouse strutting and nesting habitat and wildlife forage.

Sheep, considered to be a kind of livestock, show a preference for browse and forb species which in in direct conflict with antelope as well as muledeer.

WILD HORSES

In response to your concern about the appropriate management level of the wild horse herd, the Record of Decision for the FEIS states, "wild horse numbers to be managed for will be

determined through consultation and coordination during preparation of the activity plans." (Page 6, item #3). The range of 250 to 600 was established by consensus of the entire CMP group, not to satisfy the permittees, but to facilitate management. The DARCMP states, "Gathering down to the low AML will allow for fewer gathers over a longer time period to maintain the herd within the limits of 250 to 600 horses." (Page GIII-18). This will result in more efficient use of funds through reduced capture costs as well as reducing the potential stress caused by frequent captures. According to our 1985 inventory, the number of wild horses in the plan area has reached 722 which is well above the maximum management level. By establishing minimum and maximum management levels for wild horses their numbers can be maintained in balance with the other forage users. As you know, the annual recruitment for livestock and big game animals are, for the most part, removed from the population each year. The annual increase in livestock, calves and lambs, are either shipped to market or used to replace older and/or non-productive animals which are also shipped. In the case of wildlife, generally NDOW issues hunting permits which, in a "normal" year, would remove the annual recruitment from a healthy population. This may vary depending upon NDOW's goals for a particular herd. However, there is no such automatic yearly removal of wild horses. The strategy of managing at a certain level allows the removal of these annual increases without the negative aspects associated with yearly gathers.

Studies conducted in North Spring Valley from 1982 through 1985 document heavy utilization (60-80% use) on winterfat prior to any sheep entering the allotment. There has been no cattle use made in this area since 1977. The DARCMP states that there is ..."virtually no use by sheep ..." on the winterfat (page GIe-4, item 6). When sheep enter the allotment, use is made on the black sagebrush benches. Studies have shown no measurable difference in utilization on winterfat from the time sheep enter the allotment until the time they leave. Based on monitoring studies since 1982, the heavy use on winterfat can be solely attributed to wild horses. In addition, there has been a dramatic increase in the number of sagebrush seedlings invading the site since 1982.

ADJUSTMENTS AND MONITORING

Most of the concerns expressed here have been answered previously.

The purpose of the ARCMP is to avoid the "do nothing and monitor" syndrome. The past 3 to 5 years of monitoring data compiled for the area has been used to identify

problems, such as improper distribution of grazing animals. The plan identifies specific actions to be taken to correct these problems, such as the development of water and implementation of grazing systems. After implementation, monitoring will be used to show whether or not further actions are necessary. Only if no management were proposed would such an accusation be warranted.

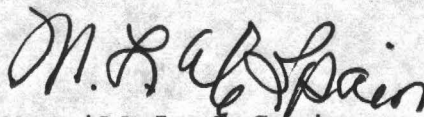
COORDINATION OF THE CMP

Because actions taken in any part of the herd area would affect the whole herd, this effort was closely coordinated between the districts even though the Ely District is not proposing any management actions within the Elko District. The Dolly Varden Flat fence is a project in the Elko District that has no connection with the ARCMP. Therefore, any concerns you may have regarding this particular fence would be more adequately addressed through the Elko District.

Lastly, we would like to say that we understand and never intended to imply that the National Mustang Association represents all wild horse groups anymore than any other individual group. However, the NMA chose to actively participate in this effort and has provided invaluable and continuous assistance in the development of this plan. Because the NMA was the only wild horse interest group which participated, they are considered to represent the interest of wild horses for the purposes of developing this particular plan.

The same opportunity for involvement which was provided to the NMA was also provided to WHOA. (See enclosed letter). In reviewing your comments, we are sure you would have had fewer concerns if you had been involved earlier in the process. We hope we have answered your specific questions about the plan.

Sincerely yours,



Merrill L. DeSpain
District Manager

Enclosures

cc:
National Mustang Association
Elko District

Errata
for
the Draft Antelope Range
Coordinated Management Plan

To the Reader:

We thank those who commented on the draft plan for their suggestions. Comments on the draft plan have been reviewed. This errata is being sent which shows the additions, corrections and changes to be made on the final plan copies. The errata is to be used with the draft copy. Page numbers, headings and other identification on the errata will guide the reader to the proper place. The errata will state what change is to be made. If the changes are acceptable to the reviewers, these will be printed in the final bound copy.

Document-Wide Changes

- General - As Mr. Wayne Lowman is now the Assistant District Manager, Resources, his name will be replaced on all signature pages with that of his successor.
- General - Wherever the name "Flat Nose" appears in reference to a spring, seeding, etc. it will read "Flat," the most official name. Note - some maps show the spring as Chokecherry I.

General Section

- Page 2 - After the second paragraph, the following will be inserted:

A comprehensive list of issues for the entire plan area will be consolidated from the issues stated in various parts of the document and placed in the General Section of the final plan for clarification.

Management Objectives

- Page 19 - In paragraph two, sentence nine, "range site number" will read "ecological site number."

Also, in paragraph three, sentence two, "range site number" will read "ecological site number."

- Page 21 - In paragraph one, after the first sentence insert this sentence:

Objectives for an individual key species may vary greatly between different areas because of site potential and proposed treatments.

Also, the heading "General Management Objectives" will have "or Goals" added to it.

- Page 23 - The following will be inserted before the list of Specific Management Objectives:

"Timeframes for achievement of specific management objectives for trend measurements (density, production, frequency) will be 10 years after implementation of the plan."

- Page 23-42 - The Specific Management Objectives will be kept the same but reorganized into a tabular format to accommodate the following:

- References to "Range Site" will all be changed to "Ecological Site."
- The term "potential" will be changed to "objective" since the vegetation to be managed for will not always necessarily equate to the potential or climax community.
- For each key area the present seral stage and the seral stage to be managed for will be identified, and will include acceptable ranges of composition by vegetation type (grass, forb and shrub).
- Objectives will be limited to key species.
- Density objectives will be stated in terms of an increase or decrease or maintenance of existing vegetation rather than in number of plants per acre. Frequency data will be used to determine whether or not increases are statistically significant.

An example of the old table and new table format is as follows:

The old information looked like this....

20. Management Area - Becky Peak - Sampson Creek Allotment

Foraging Animals - Deer Summer, Sheep, Wild Horses

<u>Location</u>	<u>S. C. S. Range Site</u>		<u>Studies Number</u>	
T. 24 N., R. 65 E., sec. 2, NE ⁴	028B054N		SCR 1	
<u>Species</u>	<u>Density(Plants/Acre)</u>		<u>Production(Pounds/Acre)</u>	
	Present	Potential	Present	Potential
Bluebunch Wheatgrass	1,000	2,000	15	30
Squirreltail	16,000	maintain	69	maintain above 25
Bluegrass	33,000	maintain	131	maintain above 100
Sedge*	130,680	maintain	18	maintain
Needle and Thread	10,000	20,000	6	12
Lupine	1,000	maintain	38	maintain above 10
Hawksbeard	-	-	5	maintain
Phlox	35,000	23,000+	15	maintain above 10
Locoweed	6,000	maintain	7	maintain
<u>Hymenoxis</u>	-	-	5	maintain
Buckwheat	-	-	2	maintain
Sandwort	-	-	6	maintain
Other Forbs	-	-	22	maintain above 10
Low Sagebrush	14,000	-	500	maintain above 200

* Sedge is not a major site component. It is to be monitored for diversity.

And will now look like this:

20. Management Area - Becky Peak - Sampson Creek Allotment
Foraging Animals - Deer Summer, Sheep, Wild Horses

<u>Location</u>	<u>Ecological Site</u>		<u>Studies Number</u>	
T. 24 N., R. 65 E., sec. 2, NE ⁴	028B037N		SCR 1	
	<u>Present Situation</u>		<u>Management Objective</u>	
<u>Key Species</u>	<u>Density (Plants/ac.)</u>	<u>Production (Lbs./ac.)</u>	<u>Density</u>	<u>Production</u>
Bluebunch Wheatgrass	1,000	15	Increase	30
Perennial Forbs*	42,000	100	Maintain	75
Low Sagebrush	14,000	500	Maintain	200

<u>Ecological Status</u> (% of Climax or PNC**)	Early-Late Seral (57% of PNC)		Late Seral (51-75% of PNC)	

<u>Relative Composition</u> (all species)	Grasses - 28%		25-40%	
	Forbs - 12%		10-15%	
	Shrubs - 60%		50-60%	

* Due to climatic conditions, total forb production exceeded potential. The objective is to at least maintain potential.

** PNC = Potential Natural Community (see Glossary).

Page 25 - In Key Area #CCR3, "black sagebrush" should be "low sagebrush" and the objective for bluebunch wheatgrass is to maintain density and maintain production over 100 pounds per acre.

Page 26 - In Key Area #TAR15, the objective for western wheatgrass is to maintain present production.

Pages 30, 36, 38, 40, 42 - The statement explaining why no key areas have been established for Management Areas 7, 8, 16, 19, 24, and 27-29 will be clarified by changing the second sentence to read:

"Until now there has been no need to establish key areas here since little or no use has been made in this area."

Page 43 - #3 a. - "Maintain the present mix of vegetation communities to maximize animal diversity," will read "Maintain or improve the present vegetation communities to provide habitat for the most diverse number of animal species as possible."

Management Actions

Page 44 D. - The first sentence will read:

"A compilation of management actions appears below. Whenever these management actions are to be initiated and funded by particular groups (i.e. range, wildlife, etc.) these actions are identified and described in detail in the separate management plans (see Sections G-I, II, III)."

Also, #1 - Flat Nose Spring Seeding - delete c.

North Creek Seeding b. "Remove sagebrush" will read "Maintain seeding."

Robison Seeding b. "Remove sagebrush" will read "Maintain seeding."

Page 51 - The following paragraph will be inserted between paragraph two and three:

"The implementation of these projects is subject to funding and other constraints and will be in the general priority order of waters, fences, and lastly vegetation conversions. Although all projects identified are assumed to be necessary at this time, if monitoring shows that the resource objectives of the plan are being met without the completion of all projects, the remaining projects will not be done."

Also, under the priority list:

Numbers and timetable will be eliminated from this list. Item 11 and 12 are re-developments, not new projects so are stricken from this list and addressed later.

Page 52 - "Four springs on Becky Peak" will read "5 springs on Becky Peak (Horse, Mustang, Grouse, Gravel and Skull)."

After the listing of the total project package, the following will be inserted before Section E. Summary of Monitoring and Evaluation.

The preceding list of projects is ranked according to the importance in implementing the plan. Types of projects are mixed and are not broken out according to timeframe or scope of the Schell Grazing EIS. The following list will break out the projects by type, using short and long term limits set by the EIS. If a project falls out of the scope of the EIS, it will be identified as such. The projects identified as out of scope will be implemented after amendments are written to the Grazing EIS. Headings to describe each project type are "In Scope of EIS" and "Out of Scope of EIS." "In Scope" is broken down into subheadings of Implement/Scheduled, Implement/Not Scheduled and Implement after Monitoring. (Scheduled means being put on survey and design lists and/or feasibility lists.)

Those projects listed in the "Out of Scope of EIS" are not necessarily lower priority than those listed in the other categories.

Springs

<u>Implement/Scheduled</u>		<u>Implement/Not Scheduled</u>		<u>After Monitoring</u>
South	Camp	Horse	Gravel	Gold
Flat	Domingo	Mustang	Rock #1	Dipping Tank
Sand	North	Grouse	Blind	Dolan Trap
Cress		Skull	Chin Summit	15 unnamed springs

Seven springs are listed to implement and are scheduled for the short term. Ten are allowed under the EIS. Twenty-six more are to be implemented over the long term (15 more years). Thirty more are allowed by the EIS for the long term. In total, 40 springs are allowed to be redeveloped over 20 years by the EIS. Only 33 are listed. There are none out of scope of the EIS.

Wells

<u>Implement/Scheduled</u>	<u>Implement/Not Scheduled</u>
Black Hills	Robison Seeding Well Deep Creek

Wells were not given allowable numbers in the EIS. These were discussed under other alternatives as water developments or alternatives to spring developments. The impacts of wells were found to be non-impairing. Therefore, the three wells listed are within scope of the EIS as being alternatives to spring projects.

Reservoirs

Implement

Goshute

Antelope Range for deer and stock (2-3)

Reservoirs were not given allowable numbers in the EIS. These were discussed under other alternatives as water developments or alternatives to spring developments. The impacts of reservoirs were found to be non-impairing. Therefore, the reservoirs listed are within scope of the EIS.

The Calcutta reservoirs and Antelope reservoir are redevelopments, not new ones, and are not counted as such. This type of work is allowed under the EIS.

Guzzler

<u>Implement/Not Scheduled</u>	<u>After Monitoring</u>	<u>Out of Scope</u>
Antelope (2)	Antelope (4) Deer Supplemental (2)	Deer Supplemental (3)

Two guzzlers are scheduled to be implemented in the short term; two are allowed under the EIS. Six guzzlers are scheduled for the long term after monitoring, which makes the eight total allowed under the EIS. Three more guzzlers may be needed but would not be done until after monitoring and after amending the EIS. These three are now outside the scope of the EIS.

Corrals

Three corrals, which will be totally operator funded, are planned for the long term. These are North Creek Pasture Loading Corral, Becky Spring Shearing Corral and Antelope Valley Loading Corral. This type of improvement is not addressed in the EIS as a limited type of improvement. It was discussed in the alternatives and found to be non-impairing and would therefore be allowed.

Fences

<u>Implement/Scheduled</u>	<u>Implement/Not Scheduled</u>	<u>After Monitoring</u>
Elko/WP Boundary - 4.3 mi.	Tungstonia -0.1 mi.	Stockade Excl.-2 mi.
	Lunch Valley -0.6 mi.	
Chin/Deep Cr. Div.- 6.5 mi.	Ante. Val Def. -7.0 mi.	
	Ante. Valley -10.0 mi.	
N. Cr. Pasture - 4.5 mi.	Sampson Cr. Drift - 0.25 mi.	
	Tippett Can -2.0 mi.	
	Moffatt -4.0 mi.	
	Ferrys Can. -1.5 mi.	
	Sanford -0.25 mi.	
	Pleas. Val. -4.5 mi.	
	Sharp Cr. -0.25 mi.	
	Horse Can. -0.25 mi.	
	Box Canyon -0.25 mi.	
	Middle Cr. Dr. -0.25 mi.	
	Stockade Pass Dr - 0.25 mi.	
	Sp. Gulch	
	N. Seed -4.5 mi.	
	Chin Cr. Drive -1.0 mi.	
	Stonehouse -5.5 mi.	
	Becky/Cherry Bound. - 6.0 mi.	
	Becky/Chin Drift - 2.0 mi.	
	No. Cr. Seed. -8.5 mi.	
	Flat Sp. Seed. -7.5 mi.	
	Robison Seed. -6.0 mi.	
<u>15.3 mi.</u>	<u>72.45 mi.</u>	<u>2.0 mi.</u>

Only 15.3 miles of fence are planned for the short term. The EIS allows 71.9 miles. Another 72.45 miles are planned over the long term. The EIS allows 215.7 miles more over the long term.

Pipelines

Implement/Scheduled

Kinsley	-3.0 mi.
Water Can.	-3.0 mi.
Stockade	-3.0 mi.
Ayarbe	-1.0 mi.
Chin Creek	-9.0 mi.
Cattail	-1.0 mi.
Antelope Well Pipe	-6.0 mi.
Bl. Hills Well Pipe	-2.5 mi.
Sharp Cr. Pipe	-5.5 mi.
Middle Cr. Pipe	-3.5 mi.
Warren	-1.5 mi.

39.0 mi.

Out of Scope

*Cedar	-20.0 mi.
*Antelope	-6.0 mi.
*Blind	-2.0 mi.
*Tunnel	-6.5 mi.
*Thomas Place	-2.5 mi.
*Ferry Canyon	-1.0 mi.
*Calcutta	-5.0 mi.
Lookout	-4.0 mi.
*McGurdy Cr.	-3.0 mi.
Robison Well Pipe	-2.0 mi.
Domingo Suppl.	-2.0 mi.
No. Cr. Pipe	-5.0 mi.
Samp. Cr. Pipe	-9.5 mi.

68.5 mi.

* totally cooperator funded

Forty miles of pipeline are allowed within the long term of the EIS. When the scheduled remaining 68.5 miles are to be built, an amendment will be made to the EIS.

Seedings, Vegetation Conversions

Writers' Note - Much confusion has arisen from this part of the plan. It appeared that we were planning many more acres of seeding and conversions than the EIS allowed (or than we had in mind). Originally, we listed each conversion under the AMP and HMP to show that it was to be multiple use and would possibly be jointly funded. The acres listed in both places were the same ones, not double. Also, we failed to break out in better detail what we had in mind for each seeding and vegetation conversion, i.e. differentiating between a new seeding and maintaining one. These two categories are both allowed by the EIS but are viewed differently as far as affected acreage is concerned. The following will break the seedings and vegetation conversions out into the proper category and will have the EIS limits applied to each.

Seedings - Maintain

Implement/Not Scheduled

North Creek	-	750 acres
Flat Spring Seeding	-	905 acres
Robison	-	1,500 acres
Henroid	-	1,484 acres
No. Kern Mtn.	-	790 acres
(Tungstonia - 350)		
(Lunch Valley - 140)		
(Rock Spring - 300)		
No. Kern Mtn. West	-	780 acres
(Moffatt)		
No. Kern Mtn. East	-	420 acres
(Blind Spring)		
		<hr/>
		6,629 acres

Maintenance of existing seedings is allowed under the EIS as a normal protection of an investment previously made. Treatment would be limited to the acres of each existing seeding. In actuality, the whole acreage shown may not be maintained, as sage grouse use areas etc. will be left untreated in the seedings these now occur in. Actual treatment method and area will be decided on during survey and design.

Vegetation Conversions

No Seeding Necessary

Implement/Not Scheduled

* No. Sp. Valley Sage	-	300 acres
* No. Eureka Sum	-	400 acres
Access corridors	-	50 acres
(Sampson Cr.)		
Sp. Gulch P-J	-	5,450 acres
NE Antelope Range P-J	-	2,000 acres
SW Antelope Range P-J	-	1,800 acres
Stockade Driveway	-	100 acres
		<hr/>
		10,100 acres

Out of Scope

Sampson Cr. P-J	-	1,000 acres
Becky Sp. P-J	-	1,000 acres
Cedar Pass P-J	-	3,690 acres
NE Schell Mtn. P-J	-	800 acres

6,490 acres

* These are combined and are top priority.

In this case, conversions will be made by use of prescribed fire, natural ignition and woodcutting. These will be done in areas where the understory is abundant enough to fill into the cleared areas without seeding. Acreages shown will not necessarily be done all at once.

Seeding Necessary

<u>Implement/Not Scheduled</u>	<u>After Monitoring</u>	<u>Out of Scope</u>
Spring Gulch North - 2,800 acres	Antelope and Deer Interseedings	Halogeton Rehab. - 800 acres
Stone House #1 - 5,100 acres	- 1,000 acres	Stone House #2 - 800 acres
<hr/> 7,900 acres	<hr/> 1,000 acres	<hr/> 1,600 acres

In this case, seeding will be necessary after conversion but will be multiple use. Actual treatment figures will be less when critical use areas such as for grouse are excluded from treatment when survey and design is done. Interseeding acres will be spread over several general areas within the plan area.

In the short term of the EIS, 750 acres of wildlife seeding is allowed. None are scheduled at present for treatment but could be done as an interseeding with the North Spring Valley Sage conversion. In the long term 18,000 acres of conversions are planned (multiple use and livestock combined) but only 7,900 converted acres need seeding. The EIS allows a total of 19,000 acres (16,000 multiple use, 3,000 wildlife) of new seedings in the long term. So the planned acres are well within scope of the EIS. There are 8,090 acres listed as being out of scope of the EIS. None of these acres need seeding but an amendment to the EIS will be written before these proceed.

Page 53 - Section D. is to be modified by changing the last two sentences to read:

"Utilization will be read by the BLM specialist and any other interested persons according to the Key Forage Plant Method. Utilization by all foraging animals will be mapped for the entire area in three broad levels of use (light, moderate, heavy) and will be measured on key areas in six levels of use (none, slight, light, moderate, heavy, severe)."

Also, Section E. is to be modified by changing the second sentence to read:

"Rain gauges are strategically located throughout the area to establish patterns of precipitation."

Page 54 - Section F. "Percent composition by species" should read "percent composition by weight."

The definition for ecological site condition will be replaced with the following:

Ecological Site - a kind of land with a specific potential community and specific physical characteristics, differing from other kinds of land in its ability to produce vegetation respond to management.

The following definition will be added:

Potential Natural Community (PNC) - the biotic community that would become established if all successional sequences were completed without interferences by man under the present environmental conditions.

The following definition will be added:

Ecological Status - The present state of vegetation and soil protection of an ecological site in relation to the potential natural community for the site. Vegetation status is the expression relative to the degree to which the kinds, proportions and amounts of plants in a community resemble that of the potential natural community. If classes are used, they should be described in ecological rather than utilitarian terms. Soil status is a measure of vegetation and litter cover relative to the amount of cover on the site to prevent accelerated erosion. Ecological status is often described in terms of seral stages.

Replace the draft definition for seral stage with the following:

Seral Stage - a particular vegetative community within the spectrum of plant association which can possibly occupy a given ecological site, measured in comparison to the potential natural community (PNC) as follows:

- 0 - 25% of PNC = Early Seral Stage
- 26 - 50% of PNC = Mid Seral Stage
- 51 - 75% of PNC = Late Seral Stage
- 76 - 100% of PNC = Climax or PNC

AMP's - General

Pages GIa-1 to GIf-29

The following two changes will be made for each AMP:

- The final AMP's will each contain a schedule for reading studies documented on Form Number NV 4400-15.
- The Studies and Evaluation sections will be changed as follows:

In Part B. Evaluation, the fourth sentence will be changed to read:

"If no change in trend is observed within 5 years after initiation of the plan and utilization levels are acceptable, management will continue as is for 5 more years."

The following will be added to the last paragraph:

"Average acceptable utilization levels throughout the allotment will be 55 percent on native perennial grasses, 55 percent on perennial forbs, and 45 percent on shrubs.

Becky Creek AMP (0101)

Page GIa-4

III. Management Actions

After A, the following section will be added.

"B. Flexibility: Livestock may enter the allotment as early as October 1, but no earlier, in order to be within the prescribed season of use. All livestock will be out of the allotment no later than May 30. The biweekly movement of sheep and sheep camps will not follow a prescribed rotation as long as use is well distributed throughout the allotment. If some areas are still receiving more use than others and the authorized officer determines that a rotation schedule is needed, a schedule will be developed as an amendment to this plan. The date upon which the biweekly movements will begin may vary between March 15 and April 15 depending on weather, but any deviation from the March 15th date will require prior approval by the authorized officer."

Page GIa-7 Section "B. Range Improvements:" will now read Section "C. Range Improvements:" Also in this section "Figure C-1)" will read "(Figure C-1 in the General Section)."

Goshute Mountain AMP (0102)

Page GIb-1

I.D. Qualifications. After the second sentence add:

Mr. Moore has a stocking rate agreement where he'll not activate over 88 percent of his preference for the period 3/1/84 to 2/28/87.

Page GIb-3

III. Add:

D. (Flexibility) Generally, the permittees may move to a use area as much as 15 days earlier or 15 days later than the specified start date. This will provide sufficient flexibility to time the movement of livestock to best meet the requirements of the resource. This flexibility will not be allowed to preclude use in an area where the season of use is relatively short. All use areas must be used in the designated sequences. All animals must generally be moved as a group, and the time flexibility may not be used to stretch use over 2, 3 or 4 use areas at a time.

Any changes in turn out or removal dates must be approved by the authorized officer.

Deep Creek AMP (0103)

Page GIc-4

I.D. Qualifications. After the second sentence add:

Two of the permittees have stocking rate agreements for the period 3/1/84 to 2/28/87. Mr. Robison would not activate any of his preference and Mr. Bateman would stay at 88 percent of his preference.

Page GIc-5

V. Second paragraph will be labeled "B." In the first sentence the term "area manager's" should be changed to "authorized officer's."

Chin Creek AMP (0104)

Page GId-4

I.D. Qualifications. After the second sentence add:

Additionally Mr. Robison has a 5,202 cattle AUM preference in the adjacent Antelope Allotment which is controlled by the BLM's Elko District Office.

Also, the sentence in parenthesis will read, (Mr. Robison also has other grazing preferences than those listed here, elsewhere in the Ely District and the adjacent Elko District.)

Page GId-9

B. In the first sentence, the word "devastated" will be replaced by "depleted".

The last sentence will read:

"The maintenance of the three seedings is * * * 1,100 AUM's."

C. The first sentence will read:

"Eight springs and three wells * * * allotment."

The second sentence will read:

"Approximately 57 miles of pipeline * * * developments."

Page GId-8

III. Management Actions

A. On the second paragraph, the first sentence will read:

"The areas of potential conversion to native forage species are generally located as follows:"

Page GId-10

E. The first sentence will read:

"Fences totaling * * * the three maintenance seedings * * * plant areas."

On the second paragraph the last sentence will read:

"Afterward, these fences will be removed."

Page GId-11

I. Continued

The last sentence of the second paragraph will read:

"There would * * * the Schell Creek Range across the mouths of Box and Horse Canyons."

Page GId-12

After the second parenthesized sentence and before the double asterisk add:

M. (Flexibility) Generally, the permittees may move to a use area as much as 15 days earlier or 15 days later than the specified start date. This will provide sufficient flexibility to time the movement of livestock to best meet the requirements of the resource. This flexibility will not be allowed to preclude use in an area where the season of use is relatively short. All use areas must be used in the designated sequences. All animals must generally be moved as a group, and the time flexibility may not be used to stretch use over 2, 3 or 4 use areas at a time.

Page GId-13

Replace this map with the one marked GId-13 in the errata.

Page GId-14

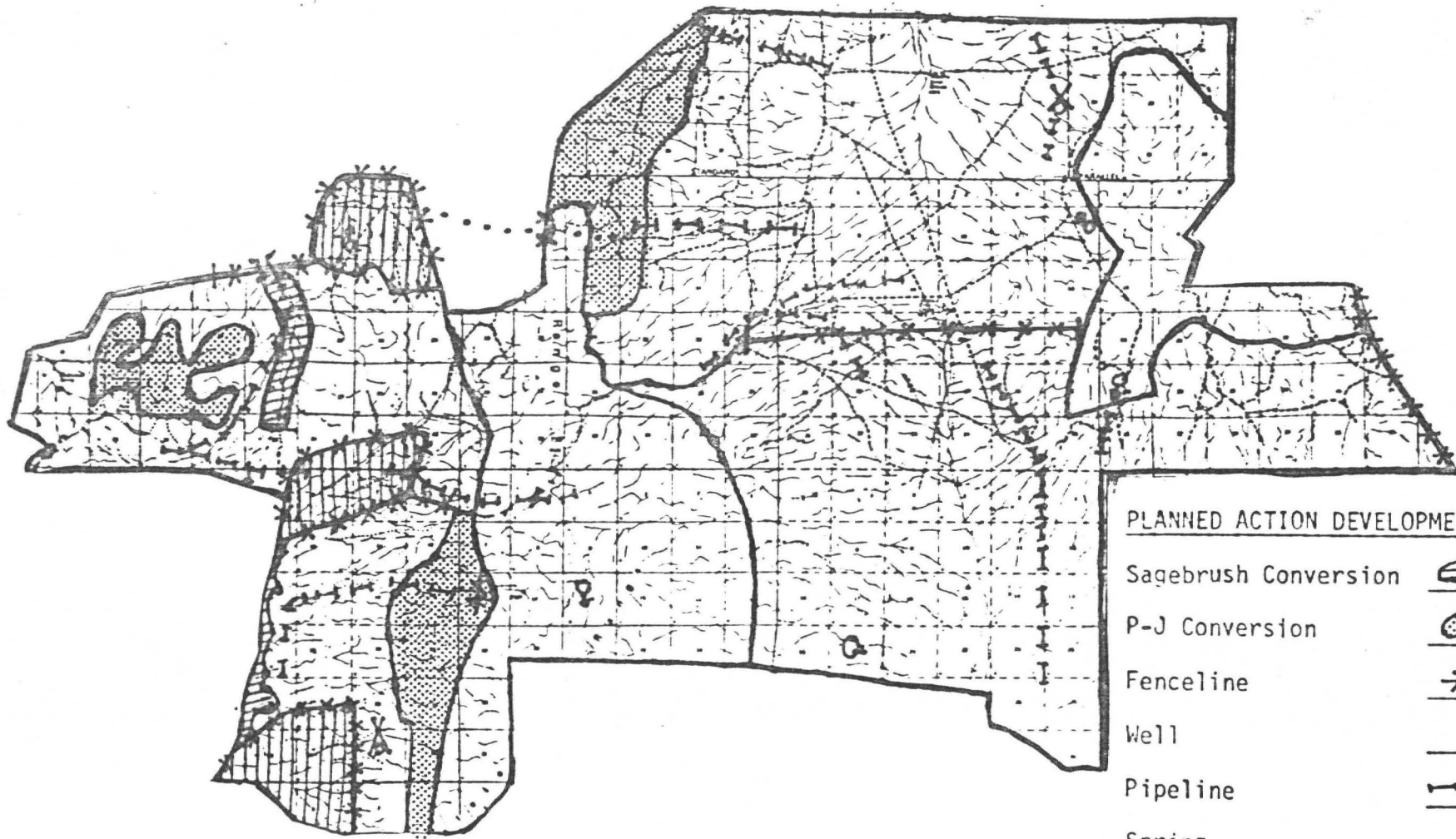
A. Under the months, (1,200) will read (*1,200). The asterisked statement will be replaced with the following:

* Three of the four months (December, January, February, March) use will occur on the Antelope Allotment in Elko County where Mr. Robison has a 5,202 cattle AUM preference. That means only one of the four months will be used in the Chin Creek Allotment, and no more than 6,000 AUM's would be activated during this interim plan for cattle. (The development of wells and pipelines by the Elko BLM District is necessary to provide sufficient water to accommodate the three months of cattle use in the Antelope Allotment in Elko County.)

CHINA STEER ALLOTMENT (0106)

S-PI9

21-570



PLANNED ACTION DEVELOPMENTS (NEW)

Sagebrush Conversion



P-J Conversion



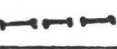
Fenceline



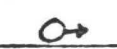
Well



Pipeline



Spring



Livestock Trail



Corral



Seeding Maintenance



B. The first heading will read:

North Spring Valley and Antelope Mountain Range Treatment - (Interim).

Also, at the end of the third sentence add after "month" or 1,480 AUM's for the four months.

The second heading will read:

North Spring Valley and Antelope Mountain Range Interim Treatment.

C. This entire section will be placed on page GId-17 after the present section F. Also, at the end of the third sentence add (5 months season of use).

Page GId-15

This map will have numbers added as shown on the errata's figure GId-6.

Page GId-16

D. This heading will be labeled C.

D. After the second paragraph, the following third paragraph will be added:

In summary under the interim plans, the operator would be able to activate up to 66 percent of his preference totally.

Black Hills	1,200 sheep	Dec-Apr	1,200 AUM's
N. Spring Valley and Antelope Mountains	1,850 sheep	July-Oct	1,480 AUM's
Antelope Valley	1,200 Cattle	Nov-June	<u>6,000 AUM's</u>
		Total	8,680 AUM's

E. This heading will be labeled D.

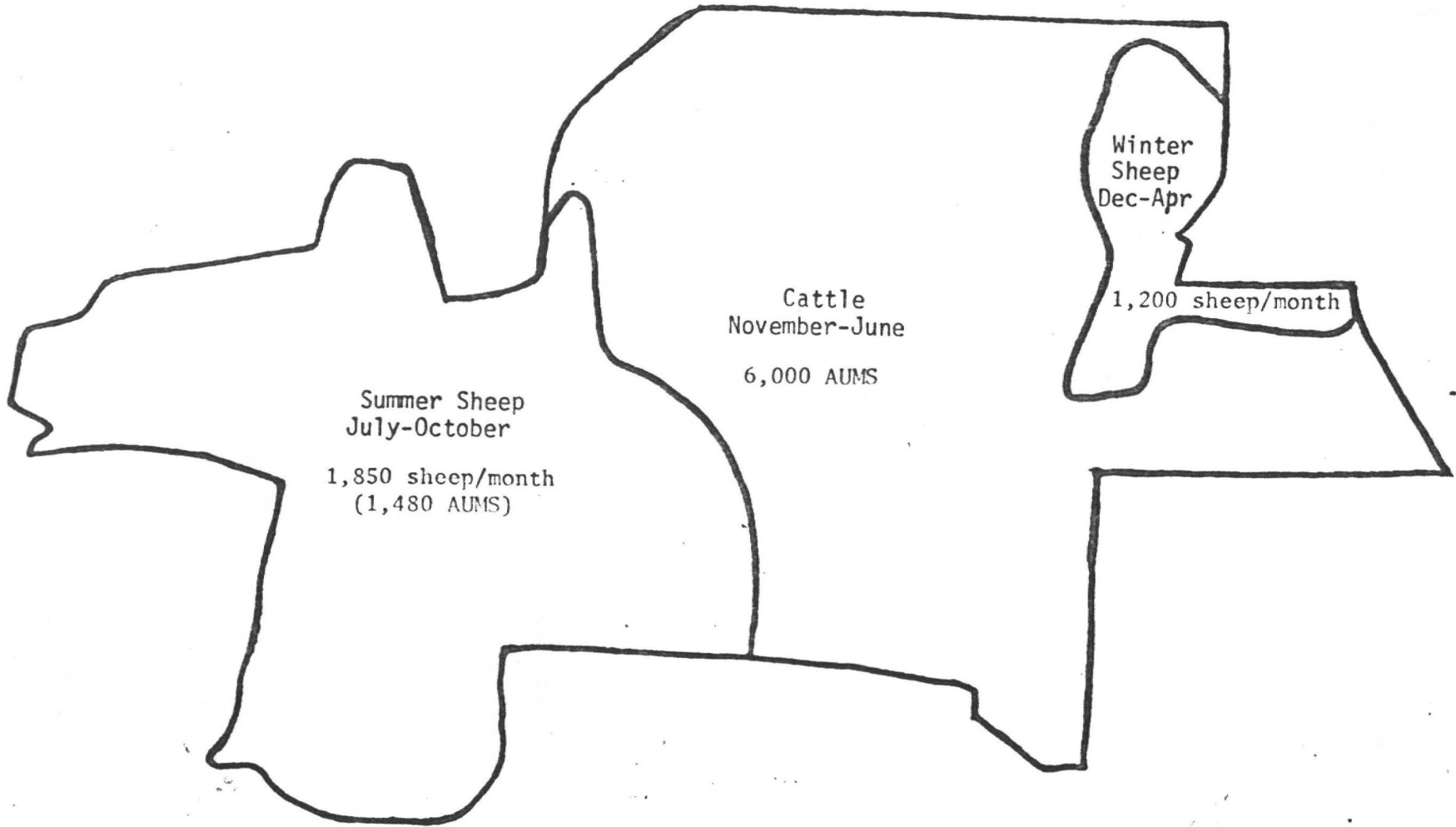
E. In the sixth sentence of the first paragraph, the number 1,500 will read 1,285.

Also, in the seventh sentence of the first paragraph, (732) will read (551).

E. The first heading will read, Antelope Valley Cattle Maximum Use Treatment (AMP Fully Implemented).

Chin Creek Allotment Interim Use Areas

9-P19



Also, the following will be added under this heading:

(Only six months use out of the eight month period (November-June) will occur in the allotment. The two months of use not occurring in the allotment will be during the period of December through March, and occur in the adjacent Antelope Allotment in the Elko District BLM.)

Also, the following numbers will replace those under First Year:

	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June
South Pasture	551	1285	1285	1285	1285			
North Pasture						1285	1285	734
Conversions								551

(Use in two of this four month period will be in adjacent Antelope Allotment in the Elko District.)

Also, the following numbers will replace those under Second Year:

	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June
South Pasture						1285	1285	734
North Pasture	551	1285	1285	1285	1285			
Conversions								551

(Five bulls per 100 cows moved on annually, June 1.)

(Use in two of this four month period will be in adjacent Antelope Allotment in the Elko District.)

Page GId-17

F. This heading will be labeled E.

F. In the first sentence, the sentence will read:

"The kind * * * in this portion of the Chin * * * cattle."

Also, in the third sentence the words "planned and will be" will follow the word "conversions."

Also, the forth sentence will read:

"Additionally there are to be two * * * sagebrush."

Also, in the fifth sentence the number 738 will be replaced with 551.

F. In the second paragraph, the following will be inserted after the first sentence:

The use made by the operator in the Sampson Creek Allotment will be sheep use from May 1 through June 30. The majority of this use will occur on the black sagebrush benches. However, lambing (from May 1 to May 20) will occur in the Robison and North Creek Seedings in rotation with the black sagebrush bench on the Sampson Creek Allotment side of North Spring Valley. (Refer to Figure GId-9.) The lambing use will be made in one of the three different areas each year so that no area is used two years in a row. (Refer to Table GId-10.) In the years which the native is used for lambing, this use will begin on one end of the bench the first year and on the opposite end the next time it is used which would be three years later.

Only one of the seedings will be used in a given year. This use will be for the lambing period only and all sheep will be off of the seeding by May 20. The operator will begin to move the ewes and lambs out of the seeding and onto the adjacent native range as the lambs reach one week of age until all sheep are out of the seeding no later than the 20th of May. This agreement allowing the operator in the Sampson Creek Allotment to lamb in these seedings in the Chin Creek Allotment is only valid as long as Warren Robison is the operator in Sampson Creek Allotment. If the operation is sold or leased, lambing would continue in a three-pasture rotation using exclusively the native range in the common use areas of both allotments.

The second sentence will be omitted. The remainder of the paragraph will read as written.

Also, the number 738 listed under four different months will read 551. Below these numbers add: (There will be a two-week flexibility, on or off, with this schedule.)

Also, under the next set of numbers, 738 becomes 551, 163 will be 125, 375 will be 250 and 200 will be 176.

After F, all of old section C on page GId-14 will be inserted.

Also, heading C will become F.

Also, the heading will be Antelope Mountain Range Treatment - Sheep.

Also, at the end of old section C (new F) add:

In summary under the fully implemented plans, the operator would be able to activate up to 100 percent of his preference.

Black Hills	1,200 sheep	Dec-Apr	1,200 AUM's
Antelope Mtn. Range	2,000 sheep	15May-15Oct	2,000 AUM's
North Spring Valley	551 Cattle	July-Oct	2,204 AUM's
Antelope Valley	1,285 Cattle	Nov-June	7,710 AUM's
Antelope Valley	1,200 Cattle	Nov-June	6,000 AUM's
		(6 out of 8 month period being used)	1 AUM not scheduled
		Total	<u>13,115 AUM's</u>

GId-19

Two figures will be inserted after page 19, GId-9 and GId-10. These figures are included in the errata.

Sampson Creek AMP (0105)

Page GIe-5

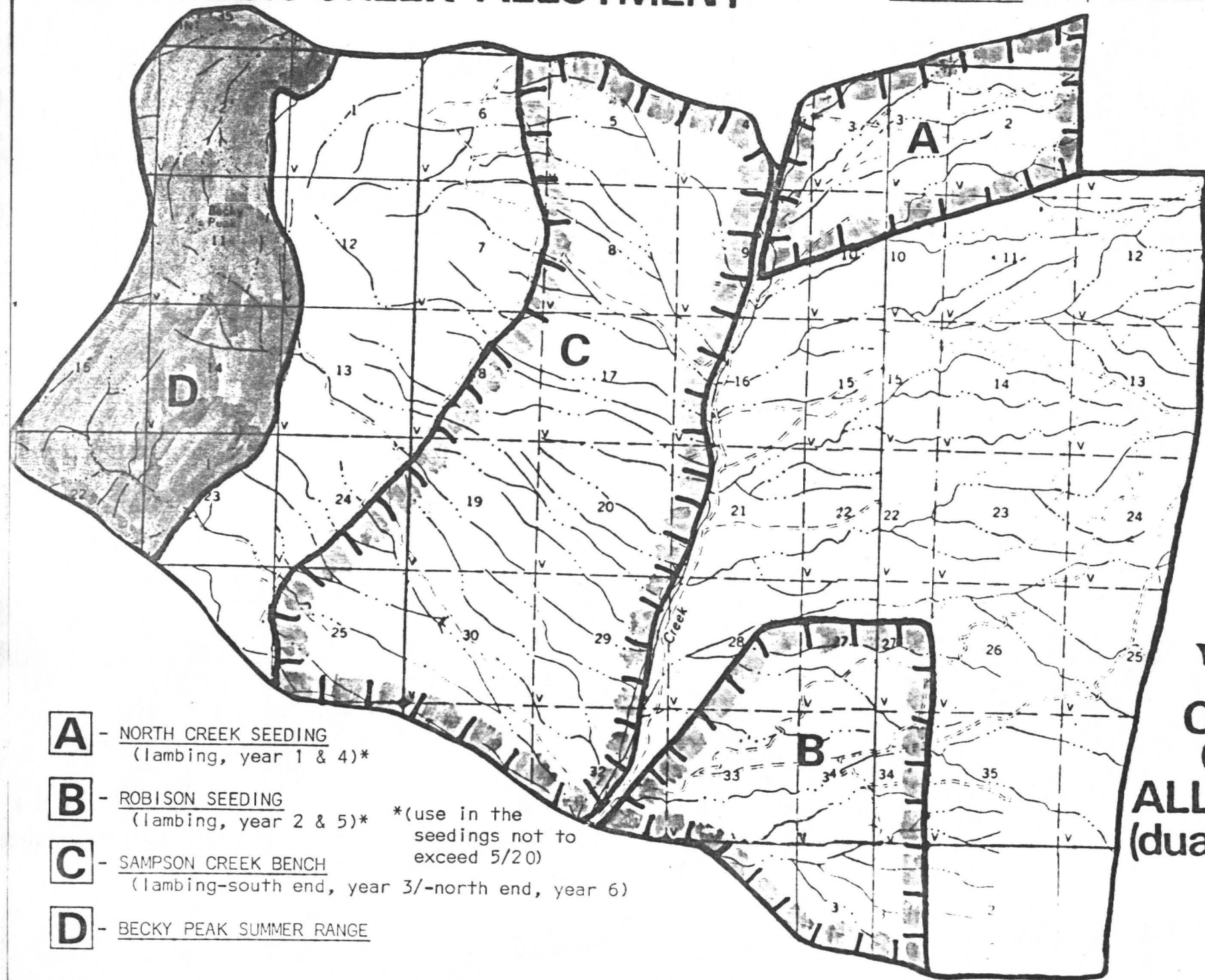
III. A.2.a Will read as follows:

The use made by the operator in the Sampson Creek Allotment will be sheep use from May 1 through June 30. The majority of this use will occur on the black sagebrush benches. However, lambing (from May 1 to May 20) will occur in the Robison and North Creek Seedings in rotation with the black sagebrush bench on the Sampson Creek Allotment side of North Spring Valley. (Refer to Figure GIe-3.) The lambing use will be made in one of the three different areas each year so that no area is used two years in a row. (Refer to Table GIe-1.) In the years which the native is used for lambing, this use will begin on one end of the bench the first year and on the opposite end the next time it is used which would be three years later.

Only one of the seedings will be used in a given year. This use will be for the lambing period only and all sheep will be off of the seeding by May 20. The operator will begin to move the ewes and lambs out of the seeding and onto the adjacent native range as the lambs reach one week of age until all sheep are out of the seeding no later than the 20th of May. This agreement allowing the

SAMPSON CREEK ALLOTMENT

FIGURE G1d-9: Sheep use areas and periods.



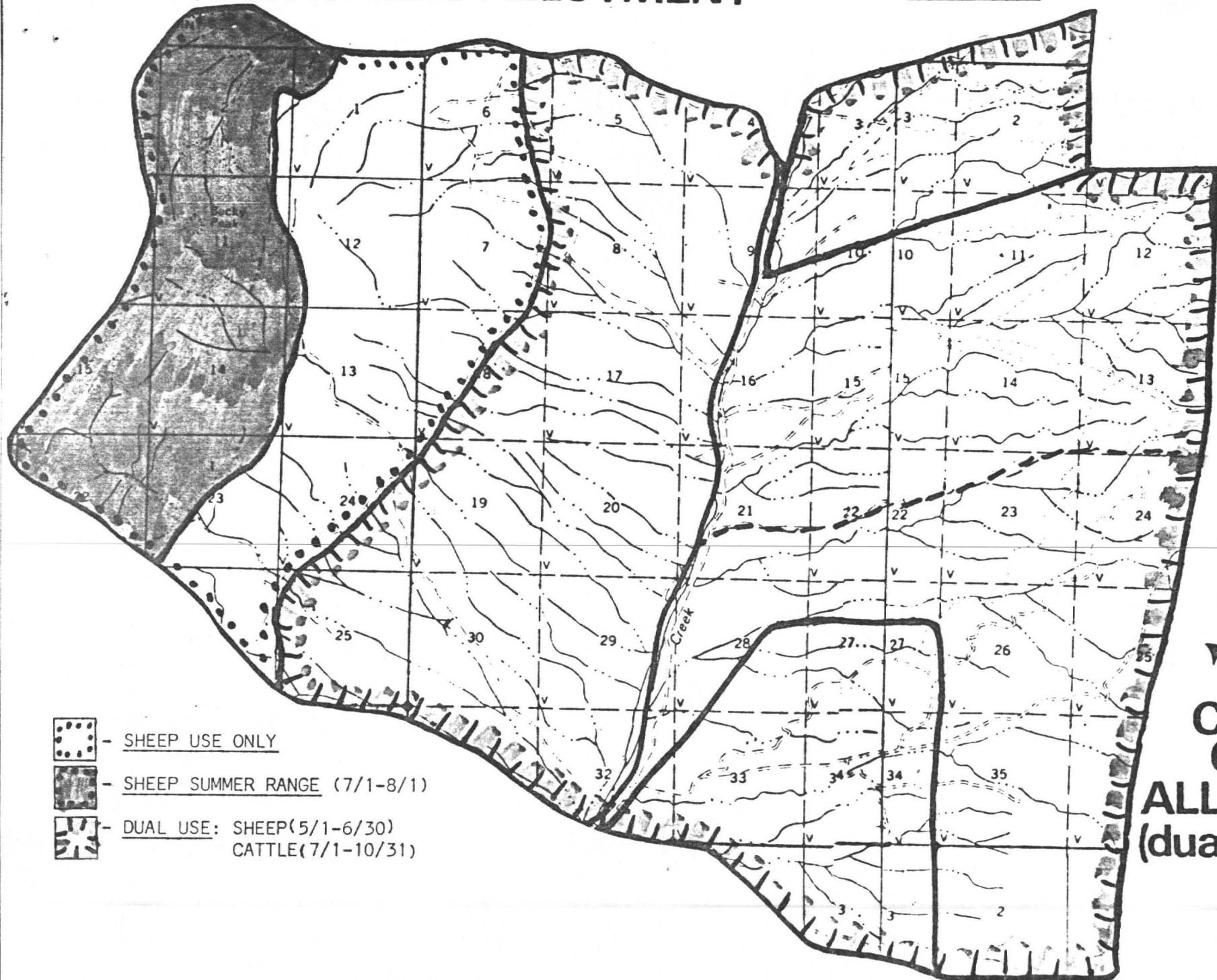
- A** - NORTH CREEK SEEDING
(lambing, year 1 & 4)*
- B** - ROBISON SEEDING
(lambing, year 2 & 5)*
- C** - SAMPSON CREEK BENCH
(lambing-south end, year 3/-north end, year 6)
- D** - BECKY PEAK SUMMER RANGE




*(use in the seedings not to exceed 5/20)

↑
CHIN CREEK ALLOTMENT
(dual use area)

SAMPSON CREEK ALLOTMENT

FIGURE G1-10: Areas of allowable use.



-  - SHEEP USE ONLY
-  - SHEEP SUMMER RANGE (7/1-8/1)
-  - DUAL USE: SHEEP(5/1-6/30)
CATTLE(7/1-10/31)

↑
**CHIN
CREEK
ALLOTMENT**
(dual use area)

TABLE G1e-1: Livestock Grazing Schedule for Sampson Creek Allotment and Chin Creek Allotment Dual Use Area.

(This table to be used with Figure G1e-1.)

TREATMENT	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEP.	OCT.	NOV.	DEC.
REST	█										█	
SHEEP USE					█							
(LAMBING AREA)					▨							
(REMAINING BENCHES)						▨						
(SUMMER RANGE)							▨					
CATTLE USE							█					

YEARLY GRAZING SCHEDULE (SHEEP)

MANAGEMENT UNIT		JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEP.	OCT.	NOV.	DEC.
First Year	AREA "A"					█							
	AREA "B"												
	AREA "C"-south						█						
	AREA "C"-north						█						
	REMAINING NATIVE						█						
	AREA "D"							█					
Second Year	AREA "A"					█							
	AREA "B"												
	AREA "C"-south						█						
	AREA "C"-north						█						
	REMAINING NATIVE						█						
	AREA "D"							█					
Third Year	AREA "A"					█							
	AREA "B"												
	AREA "C"-south						█						
	AREA "C"-north						█						
	REMAINING NATIVE						█						
	AREA "D"							█					
Fourth Year	AREA "A"					█							
	AREA "B"												
	AREA "C"-south						█						
	AREA "C"-north						█						
	REMAINING NATIVE						█						
	AREA "D"							█					
Fifth Year	AREA "A"					█							
	AREA "B"												
	AREA "C"-south						█						
	AREA "C"-north						█						
	REMAINING NATIVE						█						
	AREA "D"							█					
Sixth Year	AREA "A"					█							
	AREA "B"												
	AREA "C"-south						█						
	AREA "C"-north						█						
	REMAINING NATIVE						█						
	AREA "D"							█					

operator in the Sampson Creek Allotment to lamb in these seedings in the Chin Creek Allotment is only valid as long as Warren Robison is the operator in Sampson Creek Allotment. If the operation is sold or leased, lambing would continue in a three-pasture rotation using exclusively the native range in the common use areas of both allotments.

(The remaining part (a.) on Page G1e-9 will stay as is.)

Pages G1e-6 thru G1e-8

The two allotments maps and grazing schedule table will be corrected to reflect the change in grazing treatments. The new figures are included in the errata. (Same as G1d-9 and G1d-10, labeled G1e-2 and G1e-3.)

Page G1e-9

The following section will be added after IIIA2b:

"B. Flexibility: Any use which differs from the above described treatment will not be allowed without prior approval by the authorized officer."

Section B. Range Improvements will now be Section C. Range Improvements.

Page G1e-10

Reword the first paragraph to:

"Water is needed to distribute use on the benches and draw use away from the bottom. Water could be supplied to these areas by pipeline from Sampson Creek, a well, or reservoirs. New water will be located so as to avoid sage grouse strutting grounds." (Omit last sentence and reference.)

Tippett AMP (0106)

Page G1f-7

Table G1f-1

To the bottom of the list add:

McCurdy Creek Pipeline 2.5 miles \$10,000

Spring Gulch P-J Seeding will read 5,450 acres.

Stone House Seeding will be divided into Stone House #1, 2,000 acres, \$7,600; and Stone House #2, 800 acres, \$3,100.

Page GIF-10

III. B. Flexibility

Replace the second paragraph with the following:

This management plan is the grazing authorization for the public lands in the Tippet Allotment. Any use outside of that shown in the grazing treatments and the above described flexibility must be approved by the authorized officer.

IV. A. Studies.

The Third sentence will read:

"Key areas * * * established in consultation * * * wildlife."

Page GIF-29

The second signature will read Hank Vogler instead of Bill Rosevear.

Also, the third signature will read John Phillips Livestock Operator instead of Intermountain Ranches, LTD. and Melvin Gardner, et al. by George Swallow.

Also, following the third signature, a new line will be inserted for George Swallow, Livestock Operator. The format will be like the second and third signature lines.

HMP

Page GII-17

I., paragraph 3 "Chokecherry upland game" will read Chokecherry upland game birds."

Page GII-35

Management Actions insert as the first sentence, "Management for sage grouse will follow the Western States Guidelines for Sage Grouse."

paragraph 1, line 6:

"* * * from April 15 - May 30." Will read "* * * from April 15 - June 15."

Number 4. Starting with sentence 4, the remaining paragraph will now read:

"Removal of the phreatophytes in the pond by grazing should continue. Instances where removal was suspended caused the water to dry up via the phreatophytes and the fish population was lost (Deacon, 1985). Fencing to prevent access to the spillway is necessary."

Section N., 1. Methods. These sentences will be added at the first of the paragraph:

Many of the projects that are beneficial and necessary for wildlife are also needed by livestock and/or horses. In the case of vegetation conversion, the projects are the same areas for wildlife and livestock. Until the survey and design is done, it is unknown which activity will fund all or part of a project. Therefore, all projects needed for wildlife were listed with an estimated total cost. The cost of implementing the HMP will actually be less than shown because of the shared costs that will actually be used. Projects are starred that are included in this situation "* * *."

*2. *4. *5. *8. *9. *11.
*Projects where costs may be shared.

Section N, paragraph 7. A double asterisk will follow "Chin" and the footnote will also be double asterisk.

Table GII-6 is replaced in total with the following:

TABLE GII-6: Consumptive Use of Pronghorn Antelope in the Antelope Range Coordinated Management Plan Area, Nevada.

DATA BASE	1980	1981	1982	1983	1984
Area Survey Totals-Area 11	431	574	263	491	672
Antelope Valley	153	214	73	173	206
Spring Valley	183	194	93	161	292
Spring Valley (Plan Area)	24(36*)	6(9*)	-(24*)	-(79*)	62(109*)
Harvest Totals (Area 11)**	40	53	48	33	31
Antelope Valley	18	22	17	8	6
Antelope Valley (Plan Area)	17	20	14	8	6
Spring Valley	15	23	23	14	15
Spring Valley (Plan Area)	4	5	3	4	3
Overall % Success - Area 11 (Rifle)	98%	93%	85%	84%	84%
Hunter Days/Antelope (Rifle)	2.1	1.8	2.3	1.8	1.7

* Summer Survey

** Rifle-Archery Combined (Archery Harvest = 1-1981, 4-1982, 1-1983, 4-1984)

Page GII-60

S. References

Insert alphabetically:

Deacon, Dr. J. 1985. Letter received in response to question on Lookout Springs. Dated May 1, 1985.

HMAP

Page GIII-7

The following line will be added to the census table:

1985 Ely 451 Elko 267 Total 718

Page GIII-14

The last sentence will be omitted.

Page GIII-15

The formula will be omitted.

Page GIII-18

Item 2, first paragraph last sentence, (1983) will be changed to (1985).

Second paragraph the sentence "This census will be conducted by the BLM within 2 weeks prior to the adjustment." will be omitted.

Environmental Assessment

Page EA-6

After the last sentence of the third paragraph add:

"The magnitude of the actions proposed in the ARCMP is consistent with the Schell Grazing EIS. Other actions identified in the ARCMP will be made consistent with current planning prior to implementation through an amendment to the Schell Grazing EIS."

Page EA-8

#8 Will read:

"Alteration * * * specified in the Western States Sage Grouse Guidelines. Notification of this type of project will be done according to the MOU between the Nevada Department of Wildlife and the Bureau of Land Management."

5/19/86

WHOA!

BOARD OF TRUSTEES
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GERTRUDE BRONN, Honorary

WILD HORSE ORGANIZED ASSISTANCE
INC.
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504

JE
5/21/86

May 19, 1986

In Memoriam

LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

Mr. Wayne Lowman, Acting District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, Nevada 89301

Dear Mr. Lowman:

On April 21, 1985, WHOA responded to the Draft Antelope Range Coordinated Management Plan, subsequently receiving a letter from the State Director (May 9, 1985) assuring WHOA that WHOA's thorough review revealed concerns that would be carefully evaluated before the development of plans would continue.

On August 16, 1985, I received a letter from District Manager DeSpain, quickly dismissing the concerns expressed and stating that WHOA had had an opportunity to participate in the CRMP actively. Due to many other CRMP commitments, this was not possible; however, our in-put does not necessitate personal input, as our written in-put is sufficient under the planning process.

On April 20th, I reviewed with WHOA's attorney the extremely difficult to understand "Errata sheet" from the DARCMP. Glaringly, it emphasized "flexibility" in livestock management. Nowhere did it address WHOA's concerns on the minimum/maximum wild horse numbers objected to in our comments on the Draft Antelope Range CMP.

WHOA has not received a final document, nor a herd management plan.

Therefore, on advise by Counsel, WHOA is requesting the following information be sent in a timely fashion.

- 1) Study data on wild horse population estimates.
- 2) Monitoring information used to adjust livestock and wild horse numbers over the past 3-5 years.
- 3) All monitoring data that attributes use to wild horses as referred to by DeSpain letter. (4700-4000 (NV-043) 8/16/85



Page two

- 4) Request copies of licenses for livestock (cattle & sheep).
- 5) Stocking level agreements for Goshute Mountain and Deep Creek.
- 6) Allotment Management Plans for Goshute and Deep Creek.
- 7) Any other management plans and stocking rate agreements for HMA established since August 1985.

Thank you in advance of the receipt of the material requested.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: E.F. Spang ✓
David A. Hornbeck, Esq.
Board of Trustees

ENCLOSURES; 3

Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

4700
(NV-043)

October 18, 1983

Wild Horse Organized Assistance
P.O. Box 555
Reno, Nevada 89504

Dear Mrs. Lappin,

The Ely District is in the process of writing a management plan on the Antelope Wild Horse Herd Use Area.

This plan will address wild horses, wildlife and livestock and recommend management actions for the mutual benefit of all range users.

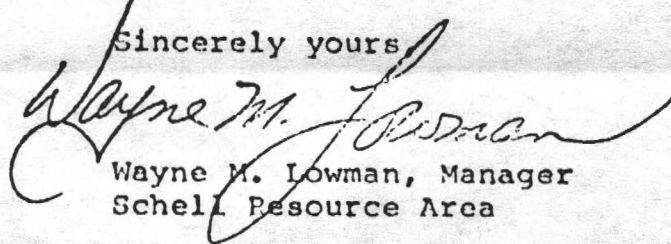
Richard Sewing of the National Mustang Association, who is also a member of the Lincoln County CRMP group, has expressed an interest to be involved in this plan.

✓ You will of course be requested to review and comment on this plan, and you are invited to participate in the development stages if your schedule permits you to do so.

In order to save time and correspondence I am requesting that interested persons notify me if they would attend meetings and field tours, or would prefer to provide input through review and comments when the draft is completed.

Attached is an outline of the tentative schedule we will follow, in developing this plan.

Sincerely yours,



Wayne M. Lowman, Manager
Schell Resource Area

Enclosure

HMB:bee:jro



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
NEVADA STATE OFFICE300 Booth Street
P.O. Box 12000
Reno, Nevada 895204700
(NV-931.3)

MAY 9 1985

Mrs. Dawn Y. Lappin, Director
Wild Horse Organized Assistance, Inc.
P. O. Box 555
Reno, NV 89504

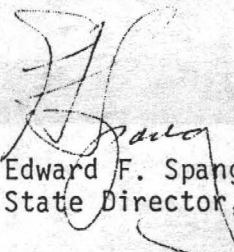
Dear Mrs. Lappin:

I have received your letter of April 21, 1985 regarding the draft Antelope Herd Management Area Plan and associated activity plans for range and wildlife.

Your thorough review of all the documents revealed concerns and problems in the draft that will be carefully evaluated before the development of the plans continue. Be assured that my policy and procedural direction relative to planning and coordination with affected interests has not changed for the Ely effort, as will be clearly shown in any final product.

Again, thank you for the interest and efforts you continue to undertake with the Districts in resolution of often complex issues in multiple use land management.

Sincerely,



Edward F. Spang
State Director, Nevada

cc: District Manager (NV-040)

maximize livestock based on sustained yield of the forage resource (summary section, page 1, item #4). One of the primary goals in the DARCMP is to provide sufficient resources to maintain maximum sustainable numbers of livestock, wildlife, and wild horses which may or may not equate to preference levels for livestock (refer to General Management Objectives #2 and #11, pages 21 and 22 of the general section).

✓ Monitoring information gathered over the past three to five years was used to determine proposed adjustments in livestock use as well as wild horse use. Where problems were identified with livestock use, changes in seasons of use and/or duration of use were proposed. Where problems were identified with wild horse use, changes in numbers were proposed because we have no control over duration or timing of use made by wild horses. Monitoring data was not the only factor taken into consideration in making this decision. One of the areas specifically targeted for horse removal is in North Spring Valley because the winterfat bottom, upon which the wild horses depend for winter forage, is proposed for vegetative treatment. The treatment would consist of removing big sagebrush and fencing the area temporarily to allow the reestablishment of winterfat and other forage species. Removing wild horses from the area prior to this treatment will minimize the impact on the remaining horses resulting from the temporary unavailability of forage. Once the native species are reestablished and the fence is removed, wild horses will receive the primary benefits from this treatment because livestock will not be making use on the winterfat (refer to the DARCMP, page G1e-9).

All of the proposed management actions, from changes in grazing systems to range improvement implementation, are designed to improve the vegetative resource and thereby benefit all foraging animals. Range improvement projects, which benefits wildlife and wild horses as well as livestock, are paid for almost exclusively out of the grazing fee receipts that are returned to the district especially for this purpose. Some of the projects will also be funded through private sources such as individual livestock operators and the National Mustang Association. These actions are being taken not at the expense of other resources, but for the benefit of all resources.

FORAGE AND RANGE IMPROVEMENTS

The problem you identified involving the number of acres of vegetative conversion discussed in the plan was also identified by others reviewing this document. The acreage figures given in the plan represent the total number of



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
NEVADA STATE OFFICE
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

IN REPLY REFER TO:

4700
(NV-931.3)

MAY 9 1985

Mrs. Dawn Y. Lappin, Director
Wild Horse Organized Assistance, Inc.
P. O. Box 555
Reno, NV 89504

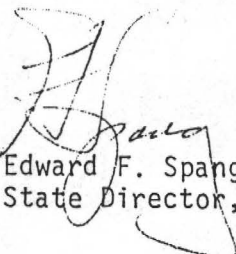
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Sincerely,


Edward F. Spang
State Director, Nevada

cc: District Manager (NV-040)

10/15/86



IN REPLY REFER TO:

4700
(NV-043)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

OCT 15 1986

Mrs. Dawn Y. Lappin, Director
Wild Horse Organized Assistance, Inc.
P.O. Box 555
Reno, Nevada 89504

Dear Mrs. Lappin:

This letter is in response to your letter dated May 19, 1986, concerning the Draft Antelope Range Coordinated Management Plan and Herd Management Area Plan. Your concerns have been evaluated for incorporation into the final HMAP. WHOA has not received a final document since it is not yet available. We are currently reviewing our approach to the coordinated effort in the ARCMP, but we are continuing with the individual activity plans. The Ely District is currently revising the Draft HMAP and we will send you a copy when it is completed.

The appropriate management level (AML) for the Ely District's Antelope herd will be established at 303 horses, which is in compliance with the Schell MFP record of decision. The minimum/maximum wild horse numbers which you objected to will be changed to ± 10 percent of the appropriate management level in the final HMAP. This will give a range of 273 to 333 horses. I understand that you discussed this AML and range with Bob Brown, on September 29, 1986, and that they are acceptable to you.

I also understand that you told Bob you don't need all the information you requested in your letter. I have, therefore, only enclosed the study data on wild horse population estimates that you still wanted.

Thank you for your input into the development of the Antelope Range HMAP. Hopefully, through our cooperative efforts, we can get this HMAP finalized and initiate proper management on the ground for the Antelope wild horse herd.

Sincerely yours,

Kenneth G. Walker
District Manager