



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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AMERICA

IN REPLY REFER TO:

4400.3 (NV-047)

SEP 27 1991

Commission for the Preservation  
of Wild Horses  
Stewart Facility  
Capitol Complex  
Carson City, NV 89710

Dear Participant:

Enclosed for your information are the Management Action Selection Reports for the Cold Creek, Horse Haven, and North Cove Allotments. These reports are the final section of the allotment evaluation, and complete the monitoring evaluation process.

The Management Action Selection Reports address the primary concerns received from involved interests, lists the options considered during the evaluation, and identifies the management actions selected. The reports also describe the rationale as to why those actions were selected.

These reports are provided for your information only, and will be followed at a later date by a proposed multiple-use decision if indicated in the report. This decision will be issued to actually initiate the chosen action on the ground, and will specify the procedures for protest and appeal. A copy of the decision will be provided to those individuals and/or organizations that have participated in the monitoring evaluation process. If no decision is required, the Management Action Selection Report will serve as documentation to the grazing file that current management is appropriate.

Sincerely,

*Gene L. Drais*

Gene L. Drais, Manager  
Egan Resource Area

3 Enclosures

1. Cold Creek
2. Horse Haven
3. North Cove

MANAGEMENT ACTION SELECTION REPORT  
COLD CREEK ALLOTMENT (0603), EGAN RESOURCE AREA  
Dan Russell, Permittee

A. INTRODUCTION

The Cold Creek Allotment evaluation was conducted in accordance with the direction set forth in Washington Office Instruction Memorandum No. 86-706, and is based on monitoring data collected between 1977 and 1990.

A limited amount of public comment was received pertaining to this allotment evaluation. Copies of the comment letters are located in the Cold Creek allotment evaluation files in the Ely District office. All allotment-specific comments were considered for incorporation into the final evaluation. Some of the primary concerns expressed for Cold Creek are addressed as follows:

Resource Concepts Inc.(RCI) commented that NRMH allowable use levels are intended to be "used as a guideline only and should be tempered with local judgement on a case-by-case basis." RCI failed to include that they were also developed as a set of "definitive criteria to assist in managing rangeland vegetation", and that the example given for exception is under intensive management. In the absence of such intensive management, it is felt that these utilization criteria are applicable. Also, as stated in the NRMH, "generally, utilization should not exceed the moderate range" (generally considered 40-60%). Allowable use levels of 50% or less on native grasses, as used in this evaluation, are widely supported in the literature (Heady 1975, Vallentine 1971, Holechek 1989), as is 60-65% for crested wheatgrass (Frischknecht & Harriss 1968, Laycock 1987, Vallentine 1971). Nowhere in the literature can we find support for 80% utilization levels on any sustained basis. The deleterious effects of grazing in excess of these allowable use levels is also widely documented in these and other sources.

An additional comment concerned the use of the Sneva Crop Yield Index. This index is not used to "correct" or "normalize" utilization data. The index is used to account for the affect of yearly climatic variations on annual forage yield, and therefore calculation of appropriate stocking levels. Since it is not feasible to adjust the numbers of all grazing animals (livestock, wildlife, and wild horses) on a yearly basis to respond to annual fluctuations in forage yield, an average carrying capacity is determined based on a "normal" year. The effects of precipitation on carrying capacity must be considered. After review of existing research on this subject, the Ely District chose the Sneva et al model as the most appropriate for this region. Authority to use the yield index is provided in BLM Technical Reference #4400-7 and Instruction Memorandum No. NV-89-468 and has been supported by a recent court ruling by an Administrative Law Judge in Oregon.

Also, the use of the "stocking rate formula" is an approved method to establish carrying capacity based on utilization, and is consistent with Bureau policy and BLM Technical Reference #4400-7.

In regards to specific questions by RCI, several points need clarification. Raw utilization values are taken from key area or use block transects when available, and the mid-point of the major use class if transects are not available. The Newark #2 pasture is made up of late-seral Sodic Flat, Saline Bottom, and Dry Saline Meadow range sites. Wild horse use on Huntington #4, as well as the rest of this allotment outside HMA boundaries, will be limited by removals in these horse-free areas. In considering the effect of drought conditions on utilization measurements, see the earlier discussion on the Sneva yield index.

The Nevada Department of Wildlife (NDOW) commented that utilization on browse in the Diamond pastures had not been adequately addressed. Transects for bitterbrush done in October of 1988 and 1990, which included both resident deer and cattle use, showed 61% and 44% utilization respectively. Perennial grass use was as high or higher, and was felt to provide the majority of the cattle forage on this unit. Since stocking rate calculations rely on a single utilization value for each year, perennial grasses were chosen as key species. Browse use will be monitored after the new stocking rates are implemented, and any additional changes that become necessary will be handled in subsequent re-evaluations.

NDOW recommended riparian exclosures for Williams and Defoe Springs. These locations will be included in riparian monitoring for this allotment, and considered for additional management.

NDOW also questioned proposed stocking rate increases for the Huntington pastures. As NDOW correctly pointed out, the statement on page 18 of the evaluation summary that "... allowable use levels have not been exceeded..." is in error, since allowable use levels were exceeded in 1990. However, several years of data are used in this and other stocking rate calculations in order to get an average calculated stocking rate for the pasture. The process is identical, whether the end result is an increase or reduction from preference. The process is applied the same in both directions.

Comments from the permittee contend that the data and interpretation, particularly for wild horses, was inadequate for the conclusions drawn. Based on current standards for monitoring and evaluation, the current evaluation is more than adequate. As to additional improvements - seeding maintenance, fencing, waters, etc. to maintain preference - evaluations are based on current conditions. If future range improvements allow for increased use, this will be addressed in future re-evaluations.

As it stands, Cold Creek Allotment already has more fencing, waters, and seeded grass than any other allotment in the planning unit.

In addition, a minor mathematical mistake was made in the evaluation summary in apportioning the stocking rates for the Huntington Unit. The corrected figures are provided in the following sections.

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

1. Range, wildlife, wild horse, and riparian monitoring studies files compiled by the Egan Resource Area and Division of Resources.
2. Input from the Nevada Department of Wildlife, Region II, in a letter dated 7/11/91.
3. Input from the N-4 Grazing Board, via a letter from Resource Concepts Inc., dated 7/29/91.
4. Input from the Nevada Commission for the Preservation of Wild Horses, dated 7/12/91.
5. Input from the International Society for the Protection of Mustangs and Burros, dated 7/12/91.
6. Input the permittee, Mr. Dan Russell, via a letter dated 9/9/91 from attorney Thomas S. Van Horne.

#### B. ANALYSIS OF MONITORING DATA

Based on analysis of monitoring studies, seven of the fifteen land use plan objectives identified for this allotment are not being met with current management practices. Therefore, additional management actions and/or adjustments in use are necessary. Overutilization of native perennial grasses by horses and cattle, and overutilization of crested wheatgrass seedings by cattle are the current problems on the allotment, in the Griswold, Strawberry, and Diamond Units. Although current ecological condition is largely acceptable, continued overuse will result in a decline in vegetative vigor and ultimately lowered condition. Increased forage availability is indicated in the Huntington and Newark Units.

### C. SUMMARY OF MANAGEMENT OPTIONS

Option 1. Reduce cattle preference on Griswold and Strawberry Seedings to 1218 and 1466 AUMs, respectively. Increase cattle preference on the Huntington and Newark Units to 1080 and 442 AUMs, respectively. Reduce cattle preference in the Diamond Unit to 888 AUM. Maintain sheep AUMs in the Diamond Unit at 242 AUMs. Set AML for wild horses, Huntington Unit only, at 48 animals yearlong.

Option 2. Same as Option 1, except that the Diamond Unit would be converted to sheep use with original preference (1739 AUMs) as an initial stocking level.

### D. SELECTED MANAGEMENT ACTION

The selected management action is Option 1, outlined as follows:

#### a. Strawberry seedings.

The cattle stocking rate will be reduced to 1466 AUMs for the entire unit, to continue in the rest rotation schedule set up in the AMP. Maximum numbers and pasture move dates for a full four year rotation cycle are shown in Appendix 1. 1466 AUMs is a 55% reduction from the original preference of 3254 AUMs for this unit. Since these seedings were fenced from wild horse use prior to 1971, wild horses are not included in this adjudication, and will not be allowed access to these seedings.

#### b. Griswold seedings

The stocking rate will be reduced to 1218 AUMs for the entire unit, to continue in the rest rotation schedule set up in the AMP. Maximum numbers and pasture move dates for a full four year rotation cycle are shown in Appendix 1. 1218 AUMs is a 63% reduction from the original preference of 3326 AUMs for this unit. Since these seedings were fenced from wild horse use prior to 1971, wild horses are not included in this adjudication, and will not be allowed access to these seedings.

#### c. Newark Unit

The stocking level for the Newark #1 seeding will be set at 292 AUMs, with a season of use from April 16 through August 31. Since the seeding was fenced from wild horse use prior to 1971, wild horses are not included in this adjudication, and will not be allowed access to this seeding.



The Newark #2 native pasture will have a tentative stocking rate of 150 AUMs, to be monitored/re-evaluated when use is made. The operator would have the option of using this pasture either in the spring (April 16 - June 15) or in the winter (November 1 - Feb. 28) depending on the availability of water for livestock.

The combined preference for the two pastures in this unit will be 442 AUMs, a 52% increase from the original 291 AUMs for this unit. In accordance with 43 CFR 4710.5(b), which states that no domestic horse permits will be allowed within the boundaries of wild horse Herd Management Areas, the domestic horse permit for 200 AUMs associated with the Newark Unit will be cancelled. These AUMs are available for cattle use and are included in the stocking rate/preference for this unit.

d. Huntington Unit

The stocking rate will be changed to 1656 AUMs for the entire unit, with the livestock to continue in the approximate rest rotation schedule set up in the AMP. Maximum numbers and pasture move dates for a full four year rotation cycle are shown in Appendix 1. In allocating the increase in Huntington #1-3 between horses and livestock, 104 AUMs (54%) for livestock, and 84 AUMs (46%) for wild horses (7 horses yearlong) will be added. The increase in stocking rate for Huntington #4 will be for livestock only, since this pasture is outside the HMA. The stocking level for cattle will be 1080 for the entire unit, a 42% increase from current active preference of 761 AUMs.

The AML for wild horses on this portion of the Buck and Bald HMA would therefore be set at 48 animals yearlong (576 AUMs), confined to the three Huntington native pastures (#1, 2 and 3).

e. Diamond Unit

Cattle stocking level will be reduced to 888 AUMs for the entire unit, to be used in the rest rotation schedule set up in the AMP. Maximum numbers and pasture move dates for a full four year rotation cycle are shown in Appendix 1. Turnout would not be allowed without functioning waters and fences, and use supervision would be stressed to maintain the pasture rotations. 888 AUMs is a 49% reduction from the original preference of 1739 AUMs. Wild horses would be removed from the Diamond Mountains horse-free area, in order to confine their distribution to existing herd areas. Also, the Paris sheep preference would remain at 242 AUMs, since no problems are indicated at this time with the limited sheep use.

f. General (all pastures)

The total cattle preference for all pastures in the Cold Creek allotment would be set at 5094 AUMs, allocated to the various pastures and units as outlined in the following section. This is a 44% reduction from current active preference. Actual use billing, as set up in the AMP, would be retained within the pasture adjudication limits. If use supervision indicates problems with adherence to AUM limits, timely pasture moves, or timely submission of actual use, this privilege would be revoked and the allotment licensed in advance. In order to maintain a thriving natural ecological balance, the AML for that portion of the Buck and Bald HMA within the Cold Creek allotment (Huntington pastures #1, 2 and 3) would be set at 48 animals yearlong (576 AUMs), within the Huntington #1,2, and 3 pastures. Wild horses in horse-free areas would be removed.

Rationale:

The desired stocking level on the seedings is based on 65% desired utilization, with spring/summer/fall use in a rest-rotation system. Stocking rates for native pastures use 50% utilization on perennial grasses as allowable use. These calculations result from actual use and measured utilization data, and indicate that reductions on the Strawberry, Griswold, and Diamond Units are necessary to meet the desired utilization level. These calculations also indicate an allowable increase in stocking level on the Huntington and Newark Units.

E. GRAZING ADJUSTMENTS

Changes in cattle preference will be phased in over 5 years as follows, with AUMs removed from active use to be held in suspension:

Active Preference (AUM's) \*

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<u>Pasture</u>	<u>Year 1</u>	<u>Year 3</u>	<u>Year 5</u>
Strawberry NW	874	678	482
Strawberry SW	574	445	316
Strawberry NE	436	338	241
Strawberry SE	773	600	427
Griswold NW	634	464	294
Griswold SW	666	488	310
Griswold NE	593	434	275
Griswold SE	729	534	339
Newark #1	226	259	292
Newark #2	116	133	150
Huntington #1	235	265	294
Huntington #2	82	86	90
Huntington #3	233	262	291
Huntington #4	323	364	405
Diamond #1	289	233	177
Diamond #2	329	265	201
Diamond #3	484	390	296
Diamond #4	350	282	214

\* Refer to Appendix 1 for Grazing Schedule Treatments by pasture, with AUMs at year 5 reduction levels.

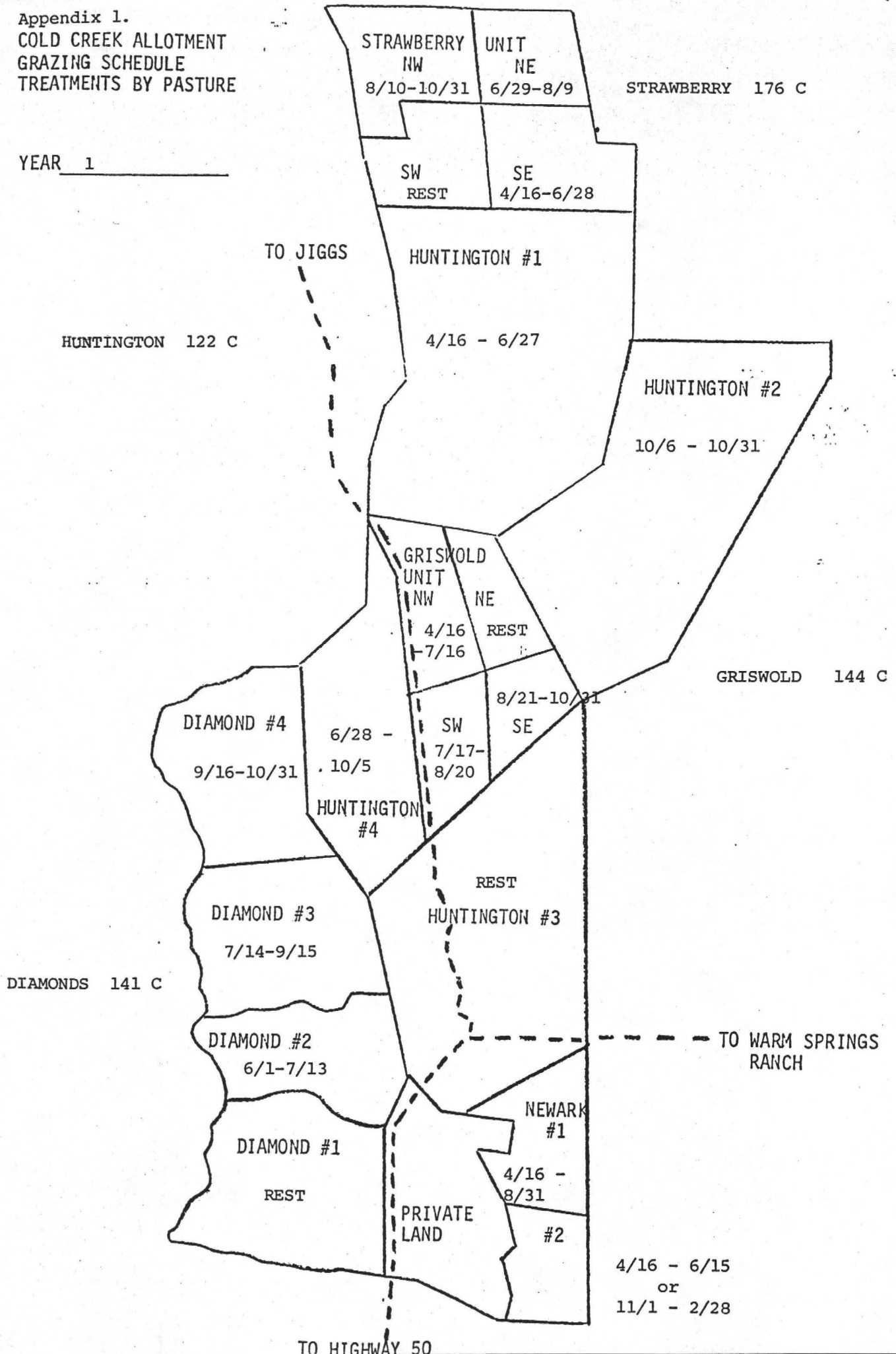
F. FUTURE MONITORING AND GRAZING ADJUSTMENTS

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



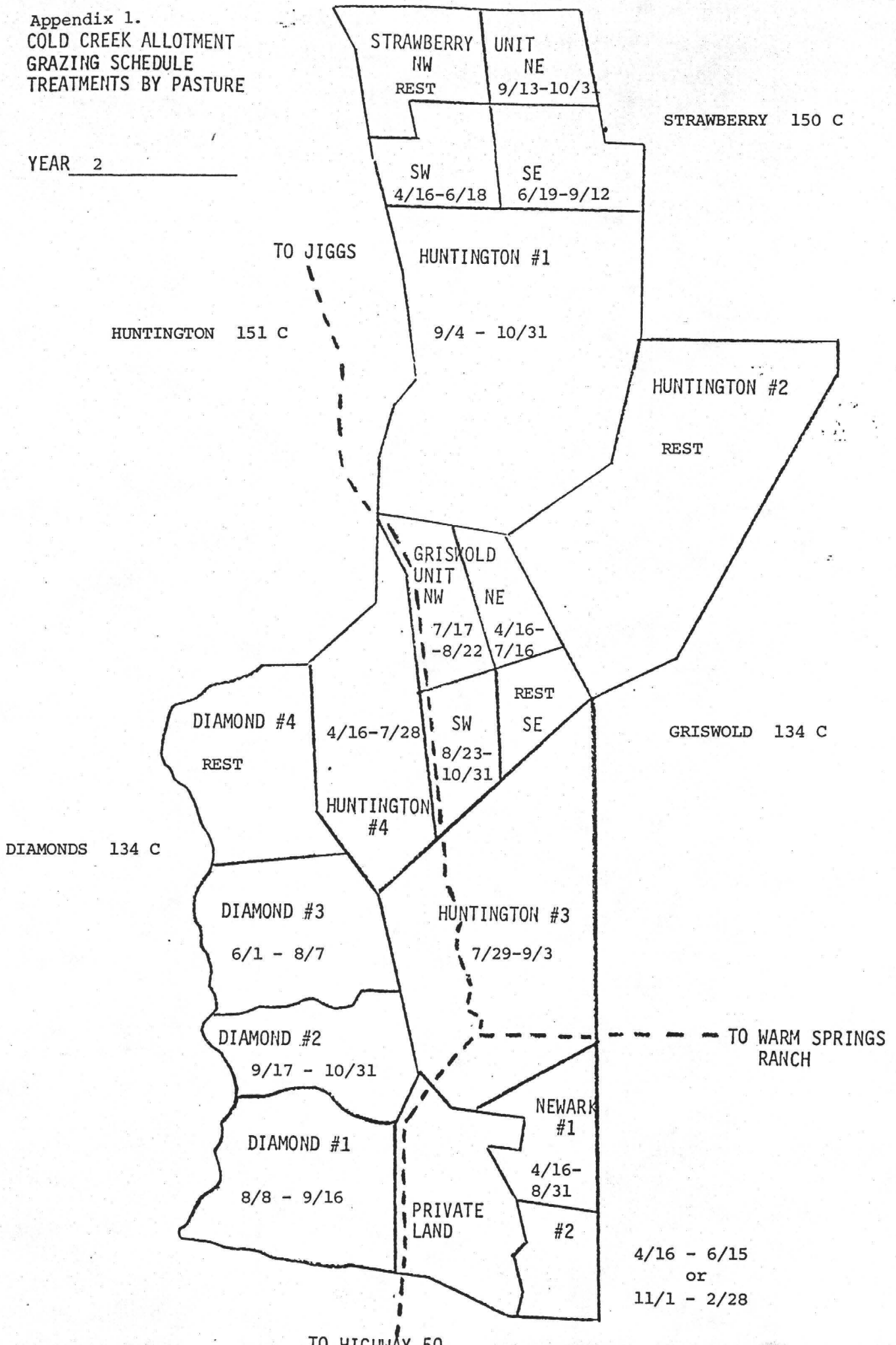
Appendix 1.  
 COLD CREEK ALLOTMENT  
 GRAZING SCHEDULE  
 TREATMENTS BY PASTURE

YEAR 1



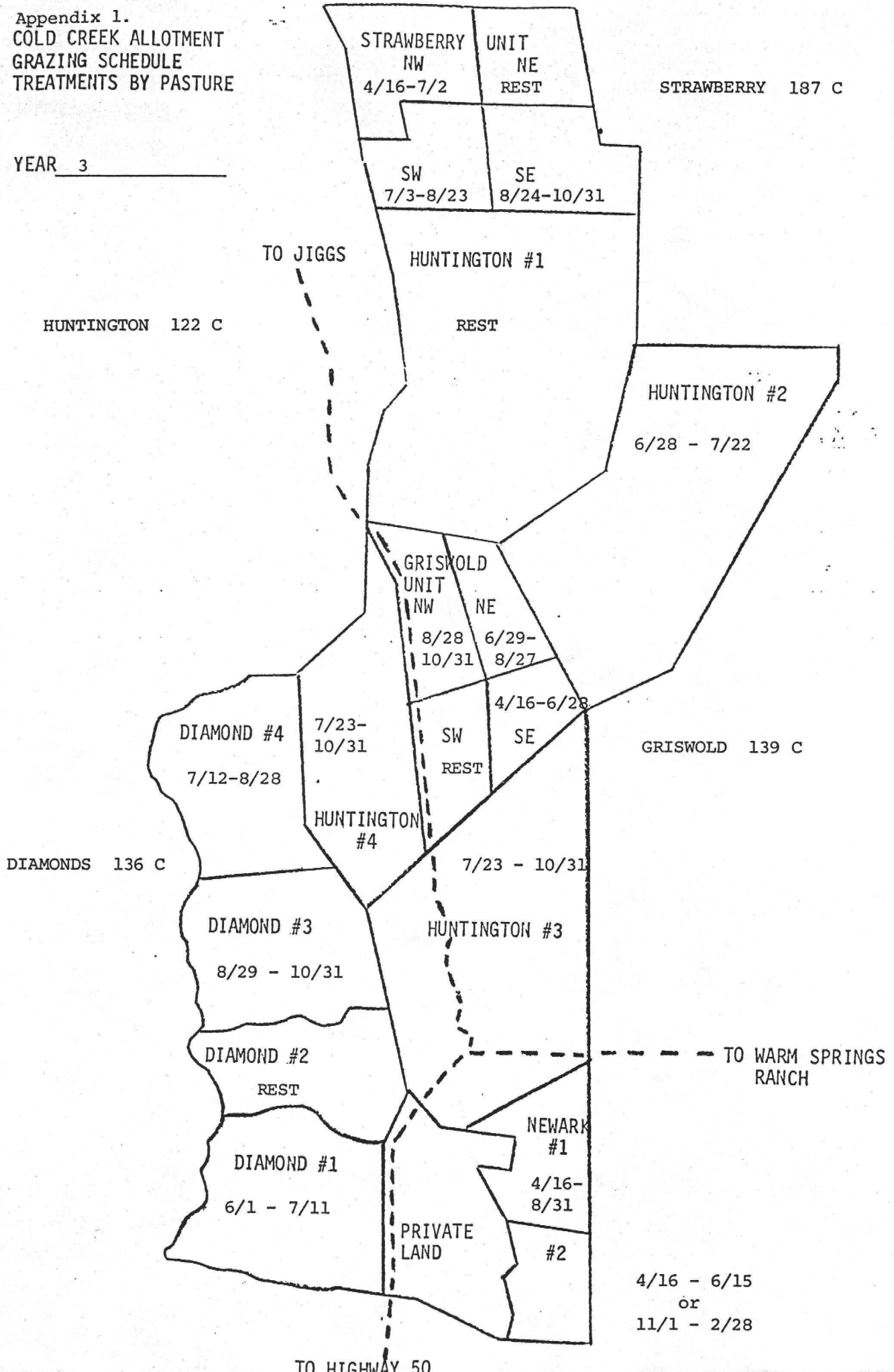
Appendix 1.  
 COLD CREEK ALLOTMENT  
 GRAZING SCHEDULE  
 TREATMENTS BY PASTURE

YEAR 2



Appendix 1.  
 COLD CREEK ALLOTMENT  
 GRAZING SCHEDULE  
 TREATMENTS BY PASTURE

YEAR 3



Appendix 1.  
 COLD CREEK ALLOTMENT  
 GRAZING SCHEDULE  
 TREATMENTS BY PASTURE

YEAR 4

