



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

IN REPLY REFER TO:

4110
(NV-241.3)

September 14, 1993

Dear Interested Party:

The Draft Bullhead Allotment Evaluation was issued on December 12, 1992. I received comments on this document from you. On April 30, 1993, Nevada First Corporation, permittee for this allotment, withdrew their Exchange Of Use Agreement. After this withdrawal, the conclusion and technical recommendations sections have changed, along with the desired stocking rates.

Please find enclosed, the revised conclusion and technical recommendation sections for your review. I would appreciate your comments by October 11, 1993. If you have any questions, feel free to contact Gene Seidlitz of my staff.

Sincerely yours,

Bob Hopper

Acting Area Manager
Paradise-Denio Resource Area

Enclosure

V. Conclusions

Conclusions will be made on a pasture basis, based on whether or not the short term objectives are being met.

A. Short Term

1. Utilization of key plant species on wetland riparian habitats shall not exceed 50%.
2. Utilization of key streambank riparian plant species in riparian habitats shall not exceed 30% on the South Fork Little Humboldt River; Pole, First, Snowstorm and Winter's Creeks, and shall not exceed 50% on Kelly Creek.
3. Utilization of key upland plant species shall not exceed the Allowable Use Level (AUL) set forth in the Bullhead Monitoring Plan.

First Creek Pasture:

1. This objective has not been met. In 1985, 1987, and 1988 heavy use occurred by cattle and wild horses on wetland/riparian habitats. Ernie Spring and associated wetland habitats, Chimney Creek, and Twenty One Creek have had heavy use associated with them.
2. This objective has been met.
3. This objective has been consistently met throughout the evaluation period.

Dry Hills Pasture:

1. There are no wetland riparian habitats in this pasture.
2. There are no streambank riparian habitats in this pasture.
3. The upland objective has not been met. In 1984, 1987, and 1988 the allowable use levels were exceeded for ORHY and SIHY. The moderate and heavy use occurred by livestock.

Snowstorm Flat Pasture:

1. This objective has been met.
2. This objective has not been met due to heavy use by cattle and wild horses. In 1986, heavy use occurred on First, Snowstorm, and Pole Creeks. In 1988, heavy use occurred on Snowstorm and Pole Creeks.
3. For the years that data was collected (1986, 1988) one year the objective was met and the other year it was not. A high livestock stocking rate, wild horse numbers, and draughty conditions all contributed to the heavy use.

Kinney Pasture:

1. This objective has not been met on the wetland riparian habitats of Kelly Creek Spring and other springs and meadows in this pasture. The heavy use can be attributed to livestock, wild horses, and the drought.
2. This objective has been met.
3. The upland objective has not been met. Heavy use by cattle and wild horses has occurred in this pasture.

Upper Kelly Pasture:

1. This objective has not been met. In 1986 and 1987 heavy use by cattle occurred on meadows, springs and associated wetland habitats.
2. This objective has been met.
3. The upland objective has not been met three out of the five years that data was collected. The moderate and heavy use by livestock occurred on SIHY and FEID.

Lower Kelly Pasture:

1. This objective has not been met. In 1986 and 1987 heavy use by livestock along with draughty conditions attributed to the non attainment of this objective on meadows, springs and associated wetland habitats in this pasture.

2. This objective has been met.
3. No key areas are located in this pasture, but the UPMS throughout the evaluation period indicate that this objective is being met.

Bullhead Seeding:

1. There are no wetland riparian habitats in this pasture.
2. There are no streambank riparian habitats in this pasture.
3. The upland objective has been met at the key areas. The UPM of 1988 and 1989 showed heavy and severe use by cattle. This can be attributed to the proximity of the seeding to the Kelly Creek Ranch. It appeared that the permittee used the seeding as a holding field for spring and winter turnout.

Rabbit Pasture:

1. This objective has been met.
2. This objective has been met.
3. This objective has been met.

B. Long Term

1. Manage, maintain and improve public rangeland conditions to provide forage on a sustained yield basis for livestock, with an initial stocking level of 8,350 AUMs.

Analysis of trend data indicates that overall progress is being made toward achieving the trend objective in Rabbit pasture. Trend is declining in First Creek pasture at KA #301 as indicated by a decrease in Agropyron spicatum and Elymus cinereus, and an increase in Poa secunda. A change can not be detected at this time in Dry Hills, Kelly Burn, and Kinney pastures and movement toward or away from the objective can not be assessed.

Analysis of short term objective in relation to the upland habitat indicates that as a majority, the AUL objectives have been consistently met in all pastures except Kelly Burn and Kinney pastures.

2. Improve to and maintain the seeded pasture in good condition (5-10 acres per AUM).

Production data is not available.

3. Manage, maintain and improve public rangeland conditions to provide forage on a sustained yield basis for big game, with an initial forage demand of 1,542 AUMs for mule deer, 158 AUMs for pronghorn, 305 AUMs for bighorn sheep.

- a. Improve to and maintain 25,268 acres in Snowstorms DY-23, 35,359 acres in Snowstorms DY-23 (Elko Co.), 8,256 acres in DY-23 (Crucial, Elko Co.), 1,130 acres in Snowstorms DS-2 and 6,522 acres in Snowstorms DS (Elko Co.) in good to excellent mule deer habitat condition.

- b. Improve to and maintain 50,137 acres in Snowstorms PY (Elko Co.), 24,242 acres in Hot Springs PY-11 and 18,171 acres in Snowstorms PY-10 in fair to good pronghorn habitat condition.

- c. Improve to and maintain 12,023 acres in Snowstorms BY-11 and 48,403 acres in Snowstorms BY-11 (Elko Co.) in good to excellent bighorn sheep habitat condition.

Data has not been collected to assess the condition and trend of mule deer summer and yearlong range, therefore, no conclusions can be drawn concerning the achievement of this objective.

Data has not been collected to assess the condition and trend of pronghorn yearlong habitat, therefore, no conclusions can be drawn concerning the achievement of this objective.

Data has not been collected to assess the condition and trend of bighorn sheep yearlong habitat, therefore, no conclusions can be drawn concerning the achievement of this objective. The consistent achievement of the upland utilization objective for the First Creek Basin Pasture indicates that there are no significant conflicts between livestock and

bighorn sheep on spring use areas. Winter use does not occur at this time in the First Creek Basin Pasture. It is reasonable to assume, that there are no significant conflicts with livestock or bighorn winter ranges.

4. Protect sage grouse strutting grounds and brooding areas. Maintain a minimum of 30% cover of sagebrush for nesting and/or winter use.

Baseline data is not available to evaluate the achievement of this objective. However, available information indicates that this objective is met on a large portion of the allotment except in the burned areas and riparian habitats where cattle and wild horse use has been heavy to severe.

5. Maintain and improve the free roaming behavior of wild horses by protecting and enhancing their home ranges.

- a. Manage, maintain and improve public rangeland conditions to provide an initial level of 600 AUMs of forage on a sustained yield basis for 50 wild horses.
- b. Maintain and improve wild horse habitat by assuring free access to water.

Utilization studies and UPM data indicate that progress is being made toward maintaining or achieving habitat objectives within the HMA.

Access to water is not restricted, but water rights should be secured for continued use.

The objective has been met.

6. Improve to and maintain 245 acres of aspen habitat types in good condition.

Baseline (ESI) and trend data has not been collected on Aspen habitat types to evaluate achievement of this objective.

7. Improve to and maintain 688 acres of riparian and meadow habitat types in good condition.

Baseline (ESI) and trend data has not been collected on riparian and meadow habitat types to evaluate achievement of this objective. The levels of utilization shown by the UPM, show current management is not compatible with maintenance of good condition riparian and meadow habitat types.

8. Improve to or maintain the following stream habitat conditions on The South Fork Little Humboldt River, Pole, First, Snowstorm, Winters, Kelly and Kinney Creeks from 42% on South Fork Little Humboldt, 29% on Pole Creek, 46% on First Creek, unknown % on Snowstorm Creek, unknown % on Winters Creek, 57% on Kelly Creek and unknown % on Kinney Creek to an overall optimum of 60% or above.
 - a. Streambank cover 60% or above.
 - b. Streambank stability 60% or above.
 - c. Maximum summer water temperatures below 70°.
 - d. Sedimentation below 10%.

Baseline data indicates that this objective is not being consistently met on any of the above mentioned creeks, but progress is being made toward achievement of >60% HCI on some creeks. The UPMs developed, indicate moderate or greater utilization levels on the creeks mentioned. The South Fork, within the enclosure, had a 59% overall optimum in 1990. Progress is being made toward the objective for this river.

First Creek has shown a decline in percent habitat optimum throughout the evaluation period. Snowstorm Creek has not been resurveyed since 1976, but visual observations by the P-D Fishery Biologist in 1991 and 1992 showed degraded conditions along several reaches. Winters Creek has not been surveyed. Visual observations on Winters Creek by the P-D Fishery Biologist in 1991 and 1992 showed that the condition of the riparian habitat ranged from poor to good depending on livestock accessibility. Poor conditions exist throughout most of the privately owned upper watershed. Stream habitat conditions improved where the channel became steeper and narrower. Habitat conditions on Pole Creek, once poor in 1976, have improved. A 1992 stream survey by NDOW and visual observations by the P-D Fishery Biologist indicated that habitat conditions along Pole Creek were within acceptable limits (HCI

>60%). Kelly Creek was surveyed in 1987 with a percent optimum of 57% and no data has been collected since. Kinney Creek has not been surveyed.

9. Improve to or maintain the water quality of the South Fork of the Little Humboldt River to Class A Water Quality Standards and the following beneficial uses: livestock drinking water, cold water aquatic life, wading (water contact recreation) and wildlife propagation.

The objective is not being met. Stream temperature, pH, TDS and phosphate exceed state standards at least some of the time, stream temperatures were highest in 1979 at the lower sampling site. This would indicate that there is not enough streambank cover on the allotment. Temperatures rose an average of 46°F from the upper to lower stream sampling points in May, July and September, 1979. TDS also rose significantly from upper to lower sites in 1979.

Phosphate levels are highest at the lower site and are higher for the more recent samples. This indicates a downward trend in water quality on the allotment.

High pH is a water quality problem that was identified in the MFP. The pH was not tested again at the same site where it was so high in 1977 (9.3). It also rises between the upper and lower sampling sites.

- b. Improve to and maintain the water quality of Pole, First, Snowstorm, Winters and Kelly Creeks to the state criteria set for the following beneficial uses: livestock drinking water, cold water aquatic life, wading (water contact recreation) and wildlife propagation. Kinney Creek's water quality should meet state criteria for livestock drinking water and wildlife propagation.

The objective is not entirely being met on Pole Creek. Turbidity exceeds the state criteria half the time for cold water aquatic life. The pH was sometimes too low for wildlife propagation and one fecal coliform test was too high for wading, although the

minimum number of samples were not taken, the objective is being met for livestock drinking water.

The objective is not being met on First Creek for cold water aquatic life, because summer stream temperatures and spring turbidity are too high. One of the alkalinity values was extremely high which would make the water unsuitable for wildlife propagation. The high value was so out of scale with the others that it probably was a bad sample. Assuming that the alkalinity and dissolved oxygen is at acceptable levels, then the objective is being met for the other uses. Streambank cover is probably inadequate because stream temperatures and turbidity are often high.

It is not known if the objective is being met for Snowstorm, Winters, Kelly and Kinney Creeks since no data has been collected.

VI. Technical Recommendation

A. Water Rights

Water rights have not been secured on the public lands within the Bullhead Allotment to ensure that water will continue to be available to wild horses. Regardless of the management alternative selected, water rights for use by wild horses should be secured on the waters listed on Table 6. These water rights should include use by livestock and wildlife.

B. Water Developments

In order to assist in relieving the wetland/riparian habitats from the pressure they are receiving from present management, the development of alternative water sources is recommended. By developing water sources on the uplands, use made by livestock, wild horses and wildlife will be expanded. The better distribution of herbivores on the vegetative resource on the uplands, will allow for the much needed improvement of the riparian areas. With the development of water sources on the allotment, the vegetative resource will sustain a more uniform utilization pattern.

There are numerous locations for small stock reservoirs throughout the allotment. Undeveloped springs and seeps also exist. The recommendation is to construct reservoirs and to develop the springs and seeps. Fencing off the spring headboxes and diverting the water into a trough via pipeline is recommended.

C. Appropriate Management Level

The appropriate management level (AML) is the number of horses which can occupy an area in a thriving natural ecological balance with other resource values including livestock and wildlife.

The following are alternative methods for determining the AML on the Bullhead Allotment.

1. The AML for the Bullhead Allotment is affected by the constraints imposed by the Strategic Plan for the management of Wild Horses and Burros on Public Lands (Strategic Plan), signed June 4, 1992. In Nevada, the Plan calls for attainment of AML within 6 years, by 2 gathers at 3 year intervals following an initial gather. Only horses 5 years of age and younger will be shipped for adoption. All older animals must be returned to the range provided for.

Population modeling shows that the general trend with an initial removal of the 0-5 year age class and subsequent removal of younger age class is for the population to continue to decrease following the last removal (due to the removal of the most productive age class) until it bottoms out and starts to slowly climb again. A second total removal of the 0-5 year old age class, 6 years after the first, will result in the virtual extinction of the population.

The following alternatives are proposed for the Bullhead Allotment/Snowstorm HMA AML.

- a) The proposed AML is 108 adult horses. Maintain the herd within -35% of AML (70-108 horses).

This AML can be reached after one gather.

b) The proposed AML is existing numbers of 161 adult horses. Maintain the herd within -35% of AML (105-161 horses).

c) An AML of 50 horses, as per the CRMP, will not be considered, for the following reason. Given current numbers, a gather of 0-5 year olds in FY 1994 and 0-3 year olds in 1997 will cause population to drop to approximately 40-45 animals before rebounding. This number, however, is below the base herbivore schedule established in the Land Use Plan. The base number was established to minimize the potential of loss due to accidents, disease, or natural catastrophe such as drought or severe winters.

d) Due to the relatively large amount of private land within the summer pastures, (Kinney - 5325 acres, Kelly Burn - 1914 acres, Snowstorm - 1856 acres) particularly Kinney Pasture, it is recommended that wild horses be maintained primarily within Castle Ridge, First Creek and Dry Hills pastures. During removals, the first priority should be to gather horses from the summer pastures. Notwithstanding, the HMA boundary shall remain as is and will not be adjusted to exclude Kinney, Kelly Burn and Snowstorm Flat pastures.

D. Livestock Grazing System

All of the grazing system alternatives would include the following terms and conditions:

Salt and/or mineral blocks shall not be placed within one quarter (1/4) mile of springs, meadows, streams, riparian habitats or aspen stands.

The permittee is required to perform normal maintenance on the range improvements for which he has maintenance responsibility as per his signed cooperative agreements prior to turnout.

The permittees actual use report, by pasture, is due 15 days after the end of the authorized grazing period.

Any livestock owned or controlled by the permittee must be eartagged. The permittee must supply the BLM with a list of private ear tags and numbers. Tags will be a

different color for each person's cattle that is being pastured. This list must be submitted prior to turnout along with livestock use agreements.

For Desired Stocking Rates, see attached appendix.

1. Alternative 1 - Continue Current Season Of Use

Under this alternative, cattle grazing would continue during the current season of use, but at a lower stocking rate so allotment specific objectives can be met. The stocking rate will range from 3,800 AUMs to 4,900 AUMs depending on the year, on which pastures would be used, and on the wild horse distribution.

Rationale:

This grazing system includes spring (04/01 to 06/30), summer (07/01 to 09/30) and winter (11/01 to 03/31) grazing. Spring grazing would be a two pasture rest rotation system. Summer grazing would be a three pasture rest rotation system which would enhance the opportunity for seedling establishment and restore plant vigor. The summer use period, under this alternative, may adversely impact the riparian habitats in the summer pastures. During the hot season, livestock tend to concentrate on the riparian areas and make less use on the surrounding uplands. Several streams in the summer pastures are tributaries to the South Fork. Lahontan cutthroat trout, federally listed as a threatened species, reside in the South Fork. Thus, the management on these tributaries directly affects the South Fork. Kinney and Lower Kelly Pastures are treated as one pasture under the three pasture rest rotation system to provide a more balanced system. The winter use fields are grazed yearly during periods of minimal growth, minimizing impact on vegetative resources.

The grazing treatments and pasture rotations follow:

Spring Use:

Year	Grazing Treatment	
	04/01 to 06/30	Rest
1	First Creek	Dry Hills
2	Dry Hills	First Creek
3	First Creek	Dry Hills

Summer Use:

Year	Grazing Treatment		
	07/01 to 08/15	08/16 to 09/30	Rest
1	Snowstorm	Kelly Burn	Kinney
2	Kelly Burn	Kinney	Snowstorm
3	Kinney	Snowstorm	Kelly

Winter Use:

Year	Grazing Treatment
	11/01 to 03/31
1	Rabbit and Bullhead Seeding
2	Rabbit and Bullhead Seeding
3	Rabbit and Bullhead Seeding

2. Alternative 2 - Summer Riparian Pasture

Under this alternative, portions of the existing pasture fences for Snowstorm, Kelly Burn, and Kinney will be removed. Once these fences have been removed, a riparian pasture will be built that encompasses the following watersheds: First, Snowstorm, Winters, Pole, Kinney and Kelly Creeks. The fencing project will be cost shared between the B.L.M. and the permittee. The stocking rate would range from 6,700 AUMs to 6,900 AUMs, depending on the year and which pastures would be used.

Rationale:

Early spring use (03/01 to 03/31) will be made in the Castle Ridge Pasture every other year. The rest that would take place in this pasture every other year, would enhance the opportunity for seedling establishment and restore plant vigor. This pasture is short of late spring and summer water in the uplands. Using this pasture in early spring would allow for better distribution of cattle on the uplands during the cool part of the year.

Spring use (04/01 to 06/30) would continue to be made in First Creek Pasture. Spring use (04/01 to 05/30) would also be made in Kinney Pasture on the west side of the rim. This area is dominated by cheatgrass and cattle would maximize the use on this green, palatable vegetation at this time of year. Portions of the rim may have to be gap fenced to inhibit movement into and from the eastern portion of Kinney Pasture, which would be part of the riparian pasture. In years that Castle Ridge Pasture is used, the eastern half of First Creek Pasture will be used, and the years when West Kinney is used, the western half of First Creek Pasture would be used. Spring Creek, which lies on private ground, would split First Creek Pasture. This creek would have to be fenced to insure the success of this system. To enhance the movement of wild horses, the fence will be constructed with gates which would be left open once the livestock are out of this pasture.

The Dry Hills and Rabbit Pastures would be winter use (11/01 to 03/31). Use during this time would not have an adverse effect on the vegetative resource because plant growth during most of this time is minimal, and the potential for regrowth is favorable once the livestock are removed on 03/31.

The Bullhead Seeding would be used to facilitate the livestock operation. The seeding would not be incorporated into the grazing system due to the mining impacts it is currently receiving.

The grazing treatments and pasture rotations follow:

Spring Use:

Year	Grazing Treatment		
	3/1 to 3/31	4/1 to 5/30	4/1 to 6/30
1	Castle Ridge		E. First Ck.
2		W. Kinney	W. First Ck.
3	Castle Ridge		E. First Ck.

Summer Use:

Riparian Pasture:

Implement the following terms and conditions for livestock use in the riparian pastures:

Cattle use in the riparian pasture will be authorized for a 60 day period when the summer pasture is scheduled for use and shall be dependent on soil moisture and vegetative conditions. Livestock will be removed when 30% utilization levels are reached on meadows and/or riparian areas, or at the end of the 60 day period. To determine removal dates, mid-point utilization studies will be conducted.

The use period may vary due to yearly fluctuations in vegetative conditions, soil moisture and climatic conditions. Prior to authorization of cattle use, meadow and riparian areas within the riparian pasture will be inspected by BLM personnel to make certain the conditions are adequate to support livestock without causing degradation to meadows and/or riparian areas. CAREX Spp. and JUNCUS Spp. will be used as indicators of range readiness. The BLM will determine the range readiness for this pasture.

Interim System - Summer Use

Prior to the riparian pasture being built, the summer pastures would be under a three pasture rest rotation grazing system. The rest in this system would enhance the opportunity for seedling establishment and restore plant vigor. Snowstorm Pasture contains the majority of the public reaches of First, Snowstorm, Winters and Pole Creeks. Each pasture would receive two growing seasons of rest

before being utilized. Stocking rates would range from 5300 to 6300 AUMs depending on the year and which pastures would be used.

The grazing treatments and pasture rotations follow:

<u>Year</u>	<u>Grazing Treatment</u>		
	7/1 to 7/31	8/1 to 8/31	Rest
1	Snowstorm	Kelly Burn	Kinney
2	Kelly Burn	Kinney	Snowstorm
3	Kinney	Snowstorm	Kelly

Winter Use:

<u>Year</u>	<u>Grazing Treatment</u>
	11/01 to 03/31
1	Dry Hills and Rabbit
2	Dry Hills and Rabbit

3. Alternative 3 - Permittees Proposal

On June 10, 1993, the Winnemucca District Office received the permittees proposal, written by Intermountain Range Consultants.

Seasons of Use:

Nevada First Corporation proposes designating the areas of the Bullhead Allotment for the following seasons of use:

Winter	Rabbit and Dry Hills	10/15 to 04/30
Early Spring	Castle Ridge	03/01 to 04/30
Spring	First Creek; Snowstorm Pasture north of Winter's Creek; Kinney Pasture east of the rim	04/01 to 06/30

Summer Kinney Pasture west of
 the rim; Snowstorm Pasture
 south of Winter's Creek;
 both Kelly Burn Pastures 06/01 to 08/30

Utility Bullhead Seeding as needed

Rationale:

The designated times listed above have been purposely overlapped in order to allow flexibility in the annual operations on the Bullhead, in accordance with the type of year (wetter or drier) the allotment is experiencing. In wetter years, the cattle would be held lower for a longer period of time, moving up into the spring and summer pastures toward the end of the period. The overlap also allows the ranch manager to begin moving livestock at earlier dates and better distribute them throughout the respective pastures.

Use of the Rabbit and Dry Hills in the proposed times would maximize the livestock distribution, would provide for grazing during primarily the dormant season, and would allow for regrowth of upland vegetation following removal of livestock by the end of April. These are the lowest-lying fields and are appropriately used during this time.

The Castle Ridge Pasture is short of late spring and summer water, and animals would have to depend upon water gaps in the South Fork enclosure fence. Using this pasture in March and April would allow best distribution of cattle on the uplands during the cool part of the year and would remove livestock from the pasture at time when full upland and riparian vegetation growth would still be made annually (if there were no wild horses using the vegetation), and would prevent or diminish any pressure on the riparian fences of the South Fork which may occur later in the season.

The Kinney Pasture east of the rim is primarily cheatgrass-dominated and is most properly used earlier in the year than presently called for, to maximize cattle use of cheatgrass at time of year when it is palatable and at which cattle tend to prefer it over coarser-stemmed perennial. The Snowstorm Pasture north of Winter's Creek includes the BLM-administered lower portions of Snowstorm Creek and First Creek (most of the length of BLM administered area of these creeks is inaccessible to livestock at any rate). Use terminating

as proposed by the end of June each year will allow for regrowth and continued growth of riparian vegetation. The same is true of use in the First Creek Pasture. The Kinney Pasture west of the rim, Upper Kelly Burn, and the South Snowstorm Pasture are the highest elevation pastures and are therefore best deferred annually until somewhat later in the season. Lower Kelly Burn is somewhat transitional between the upper and lower elevations of the allotment and are proposed in this season for the purposes of cattle movement and rotation as described below.

Annual Rotation And Use:

Winter and Early Spring use areas would be authorized use each year, with no restriction of areas of use within the designated area.

Spring use areas would likewise be authorized for use each year, but the fluctuation in yearly precipitation may allow for restricted use in some years, similar to the situation in the spring range of the Little Owyhee Allotment. On wetter years, portions of the spring range would not be used because sufficient waters would be in evidence on smaller areas of the range. In drier years, the livestock would be distributed lightly throughout the entire spring range area.

Summer use areas (West Kinney, South Snowstorm, Upper Kelly, and Lower Kelly) would be used in the following every-other-year clockwise/counter-clockwise rotation:

Counter-Clockwise

Cattle would be gathered out of the East Kinney area to which they had been pushed prior to moving to spring range. They would be rotated through Lower Kelly from 06/01 to 06/30; Upper Kelly and South Snowstorm from 07/01 to 08/15; and Kinney from 08/01 to 08/30. This rotation would occur regardless of whether the year was wetter or drier, primarily because the Lower Kelly Pasture with its high percentage of cheatgrass should not be used past the month of June. The variable 08/15 off-date from Upper Kelly and South Snowstorm and the 08/01 on date in Kinney would allow both earlier removal of livestock from the upper elevations if necessary and the facilitation of movement of livestock between pastures. Depending on the given year, livestock may be on Upper Kelly and South Snowstorm for as much as 45 days at full stocking, for 30 days at full stocking and 15 days at

lesser stocking, or 30 days at full stocking with the majority of removal by 08/01. Likewise, Kinney might have full stocking for 30 days, partial stocking for 15 days and full stocking for 15 days, or full stocking for 15 days.

Clockwise:	drier years	wetter years
Kinney	06/01 to 07/15	07/01 to 07/30
Upper Kelly & South Snowstorm	07/01 to 08/15	08/01 to 08/30
Lower Kelly	08/01 to 08/30	trail through

Rationale:

Again, on wetter years, livestock would be held lower longer, and therefore enter the upper elevation pastures at a later date. The schedule for drier years would allow early movement between pastures and provide for earlier removal from the primary summer range, using Lower Kelly to bring the livestock home during the month of August.

Livestock and Wild Horse Numbers:

Livestock would be stocked at the following numbers:

500 cattle	10/01 to 03/30	3000 AUMs
1000 cattle	04/01 to 08/31	5000 AUMs

Nevada First Corporation would like it noted that they will agree to these livestock reductions in the short term (five years) in anticipation of the Bureau removing excess wild horses from the allotment, and in anticipation of other range improvements to be developed in the five-year period, and not because they believe or because the data supports any reduction of livestock on the allotment.

Nevada First Proposes three alternatives for wild horses.

Alternative 1. Remove all wild horses from the allotment, adding their numbers to the Little Owyhee Allotment. We recognize the administrative difficulties involved in this alternative, but the present evidence strongly indicates that wild horses are creating downward trend on portions of the South Fork of the Little

Humboldt River in which essentially no livestock grazing has occurred in the past ten years or more. When faced with a choice of year-round horse populations in the Castle Ridge Pasture or the improvement and maintenance of habitat for Threatened species such as the Lahontan cutthroat trout, we believe the Bureau has no choice but to take action on the excess wild horse populations of the allotment by drastic reduction or removal. Removal of the horses which access the South Fork year-round is therefore an action which needs serious contemplation by the Bureau. Under this alternative, none of the Bullhead would any longer be considered wild horse herd use area.

Alternative 2. Wild horses would be reduced to 50 head in accordance with the agreed upon level of the CRMP signed by the Bureau and accepted as the Land Use Plan decision for this allotment. These horses would be recognized as being on the allotment for 12 months each year. The Bureau has never reduced the horses to this level and monitored for the thriving ecology of the allotment under this number of horses. This number should be monitored over a period of time to determine their long-term effects on the areas which they inhabit.

The horses would be confined to the Castle Ridge and North Snowstorm Pasture at these numbers, and the herd use area would be restricted to this area. At these numbers, the horses may very well not have the effect on the riparian areas which they apparently are now having.

Nevada First Corporation's proposal includes the condition that once the horses were removed and monitored over time, and once NFC's Active Preference is being authorized annually, that horse numbers be authorized in proportion to the cattle numbers and AUMs, if such authorization is consistent with monitoring.

Alternative 3. Wild horses would be reduced to 50 head in accordance with the agreed-upon level of the CRMP signed by the Bureau and accepted as the Land Use Plan decision for this allotment. These horses would be recognized as being on the allotment for 12 months each year. The Bureau has never reduced the horses to this level and monitored for the thriving ecology of the allotment under this number of horses. This number should be monitored over a period of time to determine their long-term effects on the areas which they inhabit.

The horses would be confined only to the First Creek Pasture at these lower numbers, and the herd use area would be restricted to this area. Horses would be removed from the Castle Ridge Pasture in recognition of the apparent damage they are causing in that area.

Nevada First Corporation's proposal includes the condition that once the horses were removed and monitored over time, and once NFC's Active Preference is being authorized annually, that horse numbers be authorized in proportion to the cattle numbers and AUMs, if such authorization is consistent with monitoring.

Each of these alternatives includes the understanding that the Bureau will correct the administrative record to reflect that horses have been removed from the checkerboard lands of the Dry Hills Pasture, and that the herd use area should be changed to reflect the fence line separating the Dry Hills from the First Creek Pasture.

Fences, Spring Developments, and Other Considerations:

Small areas and gaps between rims may be necessary to completely effect the division between East Kinney and West Kinney. NFC proposes to accomplish such fencing as necessary within the next two fiscal years.

Winter's Creek Gorge forms an effective barrier between North Snowstorm and South Snowstorm, and no additional fencing is contemplated. If a need manifests itself, NFC proposes to create such fencing as needed immediately upon identification of the need.

NFC is willing to work with BLM on the fencing of watersheds or creek drainages which contain their private lands on the creeks of the allotment. Because of the topography, land ownership patterns, and areas involved, NFC proposes that any fences which the BLM and NFC agree upon would be built primarily on BLM lands outside creek bottom areas, and Mr. Bengochea and Mr. Amos requested in our meeting of June 4 the specific identification of areas which the BLM would like to see managed specifically for their riparian values, even though they may be private lands not under the jurisdiction of management of the BLM. Upon such specific identification, upon the Bureau completing necessary clearances and EA's, and upon the BLM providing materials, Nevada First Corporation is willing to supply labor to construct such fences and is willing to agree to maintenance of such fences on BLM lands. NFC agrees that

any fencing which might cross private lands on agreed-upon fence lines would be the funding responsibility of NFC. We envision such fences to be used in order to effect time-controlled grazing use of any sub-pastures or "riparian pastures" thereby created. Nevada First stands ready at this point to work cooperatively with the BLM, NDOW, and any other agency of interest in such management. Until such agreements are reached, however, we will remind the Bureau that Nevada First Corporation's private inholdings have been removed from exchange of use authorization, and the Bureau exercises no grazing management authorization or responsibility over those lands.

Nevada First Corporation will work cooperative with BLM to provide alternate upland watering sites on the allotment and away from creek bottoms. Springs are numerous on the allotment summer range, and some sources are private while others are on BLM-administered lands. Nevada First proposes that the BLM identify specific springs which should be developed, and upon BLM's completion of clearances and EA's and provision of materials, Nevada First Corporation will volunteer its labor to construct such spring developments, pipelines, and spring source fencing which may be considered. NFC is also willing to develop spring sources on its private lands at its own cost, without the need for BLM involvement.

This spring development, in concert with the above-noted specifically-identified fencing of "riparian areas", will effect better upland distribution of livestock and allow time-controlled grazing of creek drainages.

Again, Nevada First is under no obligation to effect such agreements with BLM, but proposes these actions in a cooperative agreements with BLM. Private lands and private lands grazing are the sole responsibility of the land owner.

Isolated meadows on BLM which demonstrate a need for fencing (soil loss, etc.) may be fenced by BLM, and Nevada First supports such actions where a need is demonstrated.

To facilitate livestock control and distribution following gathering and pasture movements, a holding corral should be constructed in the northeast corner of the Kinney Pasture. This has been previously discussed, and we believe the Bureau and the permittees are in agreement on this corral.

Interim System:

Nevada First Corporation proposes no interim grazing system to effect the above proposals. Their proposals are applicable immediately, and await only the Bureau's acceptance and immediate identification of areas of concern, and necessary paperwork which can be completed only by the Bureau. Nevada First stands ready to construct necessary fencing, spring development, and pipelines upon the Bureau's completion of such paperwork and funding accomplishments.

Non-Allotment Livestock:

A necessary management action which Nevada First Corporation believes must be a priority with the Bureau is the enforcement of allotment boundaries and the closure of gates on the South Fork Enclosure which are being left open by persons unknown and are being accessed by livestock not permitted on the Bullhead Allotment.

4. Alternative 4 - Fencing Pole Creek and Kinney Pasture

Under this alternative the public portion of Pole Creek will be fenced along with gap fencing the rim in Kinney Pasture. Also, under this alternative, Snowstorm Flat Pasture will be two pastures, with Winters Ridge separating the north and south. By splitting Snowstorm Flat Pasture, Upper Kelly and South Snowstorm would be treated as one pasture. The stocking rates would range from 7200 to 7700 AUMs depending on the year and which pastures would be used.

Seasons of Use:

Early Spring	03/01 to 03/31	Castle Ridge
Spring	04/01 to 06/30	West Kinney; North Snowstorm; First Creek
Summer	07/01 to 08/31	Upper Kelly & South Snowstorm; East Kinney; Lower Kelly
Winter	11/01 to 02/28	Dry Hills and Rabbit
Holding Facility		Bullhead Seeding

The grazing treatments and pasture rotations follow:

Spring Use:

Year	Grazing Treatment	
	03/01 to 03/31	04/01 to 06/30
1	Castle Ridge	E. First Creek & North Snowstorm
2	Castle Ridge	W. First Creek & West Kinney

Summer Use:

Year	Grazing Treatment		
	7/1 to 7/20	7/21 to 8/10	8/11 to 8/31
1	East Kinney	Upper Kelly & S. Snowstorm	Lower Kelly
2	Lower Kelly	Upper Kelly & S. Snowstorm	East Kinney

Winter Use:

<u>Year</u>	<u>Grazing Treatment</u>
	11/01 to 03/31

1	Dry Hills and Rabbit
2	Dry Hills and Rabbit

Rationale:

Early spring use (03/01 to 03/31) would be made in the Castle Ridge Pasture every year. This pasture is short of late spring and summer water. Using this pasture in early spring would allow for better distribution of livestock on the uplands during the cool part of the year. Use in this pasture every year would not have an adverse impact on the vegetative resource because the vegetation has the complete growing season for regrowth, which would allow the plants to store food reserves in their root system for the next growing season.

Spring use (04/01 to 06/30) would be made in First Creek, North Snowstorm and West Kinney. In the Snowstorm Pasture, Winter's Ridge Splits the pasture. The northern portion is more suited for spring use. Using the northern part of this pasture during the spring would allow for better distribution of cattle on the uplands. The livestock removal date of 06/30 would be beneficial to the streambank riparian habitats of First and Snowstorm Creeks because of the regrowth potential, which in turn would improve the water quality and fisheries of these habitats. Although the lower reaches of these streams are on public land, access to these reaches is limited due to topography and/or dense stands of willow, aspen and rose.

In the year that the North Snowstorm Pasture is used, the West Kinney Pasture will be rested. This rest would allow for an increase in plant vigor and seedling establishment plus give the riparian areas a recovery period. The "rim" in Kinney Pasture splits the pasture. Small areas and gaps between rims may have to be fenced for complete effectiveness in separating east and west Kinney. The West Kinney Pasture is dominated by cheatgrass and livestock would maximize the use on this green, palatable vegetation at this time of year (04/01 to 06/30).

First Creek Pasture would continue to be used every year as a spring pasture. In the years that North Snowstorm Pasture is scheduled for use, the eastern half of First Creek Pasture would be used and in the years that West Kinney would be used, the western half of First Creek Pasture would be used. Spring Creek, which lies on private ground, would split this pasture. This creek would have to be fenced to insure the success of this system. To enhance wild horse movement, gates will be constructed along the fence and would be left open once the livestock are removed from this pasture.

The summer pastures would be East Kinney, Lower Kelly, South Snowstorm & Upper Kelly. Upper Kelly and South Snowstorm would be treated as one pasture under this system. It is proposed at this time, that the lower reach (public) of Pole Creek be fenced since it is recovery habitat for LGT.

In the years that spring use occurs in North Snowstorm and East First Creek, the summer rotation would start with East Kinney, then Upper Kelly & South Snowstorm and ending with Lower Kelly. In the years that West Kinney and West First Creek are used in the spring, the summer rotation would start with Lower Kelly, then Upper Kelly & South Snowstorm and ending with East Kinney. The livestock will be in each pasture for 20 days.

Winter use would be taken from 11/01 to 03/31 in the Dry Hills and Rabbit Pastures. The utilization would be taken when plants are dormant; thus the vegetative resource would not be adversely effected. The 03/01 removal date would allow for regrowth of upland vegetation.

Appendix

Desired Stocking Rates

The desired stocking rates for the pastures were determined in accordance with BLM Manual Rangeland Monitoring Analysis, Interpretation, and Evaluation, Technical Reference 400-7.

The following formula was used for calculating desired stocking levels.

$$\frac{\text{ACTUAL USE}}{\text{KMA UTILIZATION}} = \frac{\text{DESIRED ACTUAL USE}}{\text{DESIRED KMA UTILIZATION}}$$

Stocking Rates By Pasture
BULLHEAD SEEDING

Key Management Areas

1983	<u>419 AUMs</u> 17%	x 50%	=	1232 AUMs
1984	<u>932 AUMs</u> 30%	x 50%	=	1553 AUMs
1986	<u>1866 AUMs</u> 64%	x 50%	=	1458 AUMs

Use Pattern Map

1987	<u>295 AUMs</u> 70%	x 50%	=	211 AUMs
1989	<u>684 AUMs</u> 90%	x 50%	=	380 AUMs

The 50% Desired KMA Utilization, is the allowable use level for AGCR.

Average of the three key areas = 1414 AUMs
Average of the two UPMs = 296 AUMs

RABBIT PASTURE

Key Management Areas

1987	<u>72 AUMs</u> 2%	x 50%	=	1800 AUMs
1988	<u>14 AUMs</u> 14%	x 50%	=	50 AUMs
1989	<u>1047 AUMs</u> 12%	x 50%	=	4362 AUMs

Bullhead Allotment

September 13, 1993

$$\frac{1800 \text{ AUMs} + 50 \text{ AUMs} + 4362 \text{ AUMs}}{3} = 2070$$

Use Pattern Mapping

1989 $\frac{1047 \text{ AUMs}}{50\%} \times 50\% = 1047 \text{ AUMs}$

The 50% Desired KMA Utilization, is the allowable use level for the perennial grass species.

Use 1047 AUMs as a starting point because the TRT recommended use only south of Section 6 and small areas of heavy use are starting to appear.

LOWER KELLY BURN PASTURE

Use Pattern Mapping

1986 $\frac{978 \text{ AUMs}}{70\%} \times 50\% = 700 \text{ AUMs}$

1987 $\frac{455 \text{ AUMs}}{90\%} \times 50\% = 253 \text{ AUMs}$

$$\frac{700 \text{ AUMs} + 253 \text{ AUMs}}{2} = 476 \text{ AUMs}$$

The 50% Desired KMA Utilization, is the utilization objective for wetland/riparian habitats.

UPPER KELLY BURN PASTURE

Key Management Areas

1986 $\frac{1820 \text{ AUMs}}{65\%} \times 40\% = 1120 \text{ AUMs}$

1987 $\frac{1138 \text{ AUMs}}{67\%} \times 40\% = 679 \text{ AUMs}$

1988 $\frac{578 \text{ AUMs}}{68\%} \times 40\% = 340 \text{ AUMs}$

$$\frac{1120 \text{ AUMs} + 679 \text{ AUMs} + 340 \text{ AUMs}}{3} = 713 \text{ AUMs}$$

The 40% Desired KMA Utilization, is the allowable use level for perennial grass species.

Use Pattern Mapping

1986 $\frac{1820 \text{ AUMs}}{70\%} \times 50\% = 1300 \text{ AUMs}$

Bullhead Allotment

September 13, 1993

$$1987 \frac{1138 \text{ AUMs}}{70\%} \times 50\% = 812 \text{ AUMs}$$

$$\frac{1300 \text{ AUMs} + 812 \text{ AUMs}}{2} = 1056 \text{ AUMs}$$

The 50% Desired KMA Utilization, is the utilization objective for wetland/riparian habitats.

KINNEY PASTURE

Key Management Areas

$$1987 \frac{1138 \text{ AUMs}}{75\%} \times 40\% = 607 \text{ AUMs}$$

$$1988 \frac{628 \text{ AUMs}}{68\%} \times 40\% = 369 \text{ AUMs}$$

$$1989 \frac{1680 \text{ AUMs}}{70\%} \times 40\% = 960 \text{ AUMs}$$

$$1991 \frac{1100 \text{ AUMs}}{42\%} \times 40\% = 1048 \text{ AUMs}$$

$$\frac{607 \text{ AUMs} + 369 \text{ AUMs} + 960 \text{ AUMs} + 1048 \text{ AUMs}}{4} = 746 \text{ AUMs}$$

The 40% Desired KMA Utilization, is the allowable use level for perennial grass species.

Use Pattern Mapping

$$1987 \frac{1138 \text{ AUMs}}{70\%} \times 50\% = 812 \text{ AUMs}$$

The 50% Desired KMA Utilization, is the utilization objective for plant species on wetland/riparian habitats.

DRY HILLS PASTURE

Key Management Areas

$$1984 \frac{1473 \text{ C AUMs} + 63 \text{ H AUMs}}{58\%} \times 50\% = 1324 \text{ AUMs}$$

$$1987 \frac{1489 \text{ AUMs} + 12 \text{ H AUMs}}{52\%} \times 40\% = 1154 \text{ AUMs}$$

$$\frac{1324 \text{ AUMs} + 1154 \text{ AUMs}}{2} = 1239 \text{ AUMs}$$

The 50% and 40% KMA Desired Utilization levels, are the allowable use levels for perennial grass species.

Bullhead Allotment

September 13, 1993

Use Pattern Mapping

1984 1473 C AUMs + 63 H AUMs x 50% = 1536 AUMs
50%

1987 1489 C AUMs + 12 H AUMs x 50% = 1072 AUMs
70%

1536 AUMs + 1072 AUMs = 1304 AUMs
2

The 50% Desired KMA Utilization, is the allowable use level for perennial grass species.

1239 AUMs + 1304 AUMs = 1271 AUMs (No wetland/riparian habitats)
2

FIRST CREEK PASTURE

Key Management Areas

1987 2730 C AUMs + 8 H AUMs x 50% = 2583 AUMs
53%

1988 197 C AUMs + 10 H AUMs x 40% = 166 AUMs
50%

1989 1428 C AUMs + 9 H AUMs x 50% = 1331 AUMs
56%

1991 1714 C AUMs + 626 H AUMs x 50% = 2659 AUMs
44%

2583 AUMs + 166 AUMs + 1331 AUMs + 2659 AUMs = 1685 AUMs
4

The 40% and 50% Desired KMA Utilization levels, are allowable use levels for perennial grass species.

Use Pattern Mapping

1985 3008 C AUMs + 371 H AUMs x 50% = 2414 AUMs
70%

50% = 1955 AUMs

1987 2730 C AUMs + 8 H AUMs
70%

1988 197 C AUMs + 10 H AUMs x 50% = 148 AUMs
70%

2414 AUMs + 1955 AUMs + 148 AUMs = 1505 AUMs
3

The 50% Desired KMA Utilization, is the utilization objective for wetland/riparian habitats.

Bullhead Allotment

September 13, 1993

SNOWSTORM FLAT PASTURE

Key Management Areas

$$1986 \frac{910 \text{ C AUMs} + 271 \text{ H AUMs}}{62\%} \times 50\% = 952 \text{ AUMs}$$

$$1988 \frac{479 \text{ AUMs}}{38\%} \times 50\% = 630 \text{ AUMs}$$

$$952 \text{ AUMs} + 630 \text{ AUMs} = 791 \text{ AUMs}$$

The 50% Desired KMA Utilization level, is the allowable use level for perennial grass species.

Use Pattern Mapping

$$1986 \frac{910 \text{ C AUMs} + 271 \text{ AUMs}}{70\%} \times 30\% = 506 \text{ AUMS}$$

$$1988 \frac{479 \text{ AUMs}}{70\%} \times 30\% = 205 \text{ AUMs}$$

$$\frac{506 \text{ AUMs} + 205 \text{ AUMs}}{2} = 356 \text{ AUMs}$$

The 30% Desired KMA Utilization, is the utilization objective for Pole, Winters, Snowstorm, and First Creek.

Castle Ridge 1826 AUMs based on the 1978 Range Survey. Livestock utilization was not taken throughout the evaluation period, thus, monitoring data is not available to arrive at a Desired Stocking Rate.

C AUMs = Cows
H AUMs = Horses

After the initial gather down to the AML of 108, the following pastures will have AUMs allocated to the wild horses. Dry Hills - 120 AUMs, First Creek - 492 AUMs, and Castle Ridge - 684 AUMs. These AUMs will be subtracted from the Desired Stocking Rates for the pastures and the remaining AUMs will be allocated to livestock.

These numbers are based on the wild horse distribution from 1986 to 1992.