



United States Department of the Interior

L ✓ 3-26-98

BUREAU OF LAND MANAGEMENT  
Winnemucca Field Office  
5100 East Winnemucca Boulevard  
Winnemucca, Nevada 89445  
702-623-1500

In Reply Refer To:  
(NV-22.10)  
4400

March 26, 1998

Dear Interested Public:

I am sending you a summary of management implemented, monitoring, actual use and climate for the Blue Wing/Seven Troughs Allotment from 1995 through 1997. This summary evaluates the short term objectives and Grazing Standards for the Sierra Front-Northwest Great Basin Area. We made recommendations based on the evaluation of those objectives and standards.

There is also an up-date on the range projects outlined in the Final Evaluation and others subsequently identified.

If you have any questions, please contact Rich Adams, Nadine Francis or Tom Seley. They can be reached at (702) 623-1500. If you have any comments please forward them to Rich.

Sincerely yours,

Colin P. Christensen, Asst. District Manager  
Winnemucca Field Office

cc:

C-Punch  
Pershing Cty Sportsmen's  
NV Land & Res Co, LLC  
Honorable Harry Reid  
Pershing Cty. Commissioners  
Intermountain Range Consultants  
NV Woolgrowers Assoc.  
Wes Cook  
Joe Dahl  
NRDC

Buster Dufurrena  
Tim Delong  
CPWH  
Mayor Hugh Montrose  
NDOW  
The Wilderness Society  
NV Cattlemen's Assoc.  
Bob Irvin  
Keith Guenther  
Inter. Society for the Protection of Mustangs & Burros

John Espil  
Myron Goldsworthy  
WHOA  
Pershing Cty Concerned Citizens  
RCI  
Desert Bighorn Council  
Human Society of U.S.  
SCS - Lovelock  
Sierra Club - Toiyabe Chap.

UNITED STATES DEPARTMENT OF THE INTERIOR  
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Memorandum

To: Pete Christensen, ADM Renewable Resources  
From: Rich Adams, RMS  
Subject: Blue Wing/Seven Troughs 1995, 1996, and 1997 Grazing Summary

The Blue Wing/Seven Troughs Multiple Use Decision was issued December 6, 1994. Management actions outlined in the Decision were:

Implemented short term utilization levels for riparian/wet meadows, shrubs/browse species, and upland rangeland habitat.

Outlined long term vegetation objectives to meet habitat needs for livestock, wild horses/burros, mule deer, antelope, and sage grouse.

A livestock carrying capacity and an appropriate management level range for wild horses/burros with a phased implementation schedule.

A north/south grazing system for C-Punch's livestock.

Projects outlined in the Evaluation to implement the above actions were:

Evaluate the condition of existing water developments with the operators.

Analyze the District water inventory and determine if there are any additional surface water sources that could be developed.

Construct enclosures around spring sources to protect them from livestock and wild horses and burros. Water will be available outside the enclosure.

Construct a boundary fence between the Blue Wing/Seven Troughs and Majuba

Allotments. This fence should keep wild horses off the checkerboard lands and in the HMA's and a management aid for the cattle operators.

The decision was appealed in 1995 by one of the operators.

Actions implemented since the decision include:

1. Implemented livestock reduction, the north-south grazing system, and livestock management actions.
2. In January/February 1995, approximately 1,804 wild horses and 528 burros were removed.
3. Performed wild horse and burro census in June of 1995 for the entire allotment and December 1997 for the Kamma Mountain and Antelope Range areas.
4. Livestock supervision.
5. Monitoring for short term objectives and riparian functionality on Jenny Creek.
6. Project lay-out and design for the Blue Wing/Majuba fence and for four spring sites in the Lava Beds.
7. In February 1998, 165 wild horses and 4 mules were removed from the Antelope Range Herd Area and the Kamma Mountain Herd Management Area.
8. Garrett Spring was developed and the source fenced.
9. The stockwater troughs at Rattlesnake Spring were replaced.

## **MONITORING**

Utilization - Transects were done to monitor for short term objectives. The following tables (pages 3-6) summarize the transect data. There were areas that transects were not completed but utilization levels were documented or observed (page 7).

See Appendix 1 for the species abbreviations.

Location	Date	Species1	%Utl	Species2	%Utl	Species3	%Utl	Comments
Selenite #1	10/95	EPHEDRA	27	RIBES	0	----	--	Form and age class satisfactory
Selenite #2	10/95	PUTR	16	----	---	----	--	Form and age class unsat
Jenny Creek	10/95	POTRT	4	----	---	----	--	
T31N,R28E,Sec 25 Stonehouse Cyn	10/95	POA	82	JUNCUS	73	----	--	
Rabbit Hole Spr.	10/95	CAREX	55	----	---	----	--	
T31N,R29E,Sec18; Meadow head of Wildcat Cyn	10/95	CAREX	79	POA	83	----	--	
T31N,R28E,Sec 12 Springs top of 7T's	10/95	POA	87	JUNCUS	82	----	--	
T30N,R24E,Sec 8 Selenities	10/95	POA	73	JUNCUS	43	----	--	
T30N,R24E,Sec 29 Selenites	10/95	POA	65	JUNCUS	55	----	--	

Location	Date	Species1	%Utl	Species2	%Utl	Species3	%Utl	Comments
10 Mile Spr	7/96	AGSP	27	----	---	----	--	Done at the elevation of the spring.
T34N,R30E,Sec 20; Kamma HMA	8/96	POA	13	SIHY	6	----	--	Very little WH and LVT sign
T26N,R28E,Sec 30; E. of Ragged Top Well	8/96	ORHY	0	----	---	----	--	Sand sheet, lvt use area for 96
T27N,R26E, Sec 1; unnamed draw	8/96	JUNCUS	20	----	---	----	--	Lvt use area for 96, some WH's in area
T27N,R26E, Sec 1; Flats near above	8/96	ORHY	46	----	---	----	--	Lvt use area for 96, Lvt moved within 2 wks of doing transect
T29N,R27E,Sec 1; About 1 mile west of Porter Spr.	8/96	ORHY	66	----	---	----	--	Only burros used this area
135-UL-15	11/96	STTH2	9	SIHY	0	----	--	
Selenite #1	10/96	RIBES	0	HOLOD	14	EPHED	0	Shrubs in Satisfactory condition
Selenite #2	10/96	PUTR	3	----	---	----	--	Shrubs in Satisfactory condition
T27N,R25E,Sec 2; North of Tunnel Spr	2/97	SIHY	33	----	---	----	---	Measuring 1996 utilization
West of Mud Spring ?	7/97	STTH2	21	POSE	7	SIHY	9	Mid-season monitoring
135-UL-08 Lava Beds	7/97	SIHY	5	----	--	----	--	Mid-season monitoring
Between Mustang and Eagle Rock Spr-Lava Beds	8/97	JUNCUS	27	STTH2	42	ELCI	37	Mid-season monitoring
T32N,R28E, Sec 27, Granite spr wash, west of 7T's mtns	7/97	SIHY	3	----	--	----	--	Mid-season monitoring
T29N,R27E, Sec 4,W. of Porter Spring	7/97	SIHY	24	ORHY	9	EULA	5	Mid-season monitoring

Location	Date	Species1	%Utl	Species2	%Utl	Species3	%Utl	Comments
T29N,R27E,Sec 30, S. of Blue Wing Mtn	7/97	ORHY	18	SIHY	12	----	--	Mid-season monitoring
T29N,R29E,Sec 15, Sage Valley-Bach Well	7/97	SIHY	7	EULA	1	----	---	Mid-season monitoring
T31N,R29E,Secs 25&36, S. of Rocky Cyn	7/97	ORHY	12	EULA	1	----	---	Mid-season monitoring
T34N,R29E,Sec1, W. of Wild Rose Spr.	7/97	POA	10	SIHY	1	----	---	Mid-season monitoring
T34N,R30E,Sec8, E. side of Kamma Mtns	7/97	SIHY	27	POA	9	----	---	Mid-season monitoring
T34N,R29E,Sec 36, S. of Rosebud Cyn	7/97	SIHY	23	----	---	----	---	Mid-season monitoring
T34N,R30E,Sec 20, Between Rosebud Cyn and new road to Rosebud mine	7/97	SIHY	4	POA	18	----	---	Mid-season monitoring
T31N,R29E,Sec19; Meadow in American Cyn	10/97	POA	29	JUNCUS	29	----	--	
T31N,R29E,Sec18; Meadow head of Wildcat Cyn	10/97	POA	70	JUNCUS	65	----	--	Horse use only, no lvt in this area.
Eagle Rock Spr Area	10/97	JUNCUS	43	POA	24	----	--	
T31N,R29E,Sec30; Stonehouse Cyn	10/97	CAREX	2	----	--	----	--	
T31N,R29E,Sec30; Stonehouse Cyn	10/97	POA	0	----	--	----	--	
Jenny Creek	10/97	POTRT	1	JUNCUS	1	----	--	



Location	Date	Species1	%Utl	Species2	%Utl	Species3	%Utl	Comments
T30N,R24E,Sec4; near Luxor Peak	10/97	JUNCUS	57	POA	69	----	--	
T30N,R24E,Sec8; near Luxor Peak	10/97	JUNCUS	53	POA	70	----	--	
T31N,R24E,Sec33; Double Spout Spr.	10/97	JUNCUS	40	POA	57	----	--	
Selenite #1	10/97	RIBES	3	HOLID	0	----	--	Form and age class satisfactory
Selenite #2	10/97	PUTR	8	----	--	----	--	Form and age class satisfactory
T30N,R24E,Sec20; Meadow just south of Selenite #2	10/97	JUNCUS	54	----	--	----	--	
T30N,R24E,Sec20; Meadow just south of Selenite #2	10/97	JUNCUS	39	----	--	----	--	
T28N,R26E,Sec32; Juniper Spr area	12/97	SIHY	12	----	--	----	--	1997 Livestock Rest; about 2" of snow
135-UL-07	12/97	EULA	3	ORHY	28	SIHY	13	1997 Livestock Use area

## Ocular Observations:

(7/97) - Utilization on springs between Limbo Holding Field and Texas Basin Exclosure were estimated to be light. Upland utilization was light.

- Granite Spring area slight use on Indian Ricegrass and stipa.

- Sagehen area slight overall.

- Granite Spring Ridge slight use.

- Stonehouse study site area had light use; Lower Stonehouse spring slight use.

- Jayhawk well area overall use was slight with some 1/10 acre areas that were moderate on Indian Ricegrass. This was horse and cattle use.

- Juniper Mountain there was moderate to heavy to heavy near the spring at T. 27 N., R. 26 E., sec. 3 SWSW. Sign indicated the use was by wild horses.

- Utilization between Texas Basin Exclosure and Empire were light.

- Utilization from Corral Spring, to Olson Spring, and to the headwaters of Cow Creek was slight. Utilization around Shingle Spring was moderate. No cattle were observed in these areas.

(10/97) Use on STTH2 about 1/8 to 1/4 mile from Shingle Spring was moderate. Utilization from main Cow Creek Exclosure to the head of American Gulch was slight. A bowl east of the main Cow Creek Exclosure was light.

(2&3/97) Sheep utilization in the Rocky Canyon area on Poa, bud sage, and Wyoming sagebrush was light.

(2/97) Utilization on 1996 vegetation was slight from Porter Spring, Last Chance Spring, Alson Spring, Mule Canyon, Juniper Canyon, and the east toe slopes of the Lava Beds.

(4/96) T26, R26, Sections 3,4,5,8,9, and 10 in the Shawave Mountains utilization levels were slight.

(4/96) School Bus Canyon area utilization was slight.

(10/96) Granite Springs Ridge on the Shawave Mountains utilization was slight.

## Wild Horse and Burro Census

The allotment was censused in June of 1995 to determine if the BLM had fulfilled the obligations outlined in the Settlement Agreement with C-Punch. A representative of C-Punch flew all four days.

The Kamma Mountain HMA and Antelope HA were censused in early December 1997 in support of a partial allotment gather in early 1998. The rest of the allotment is scheduled to be censused in June of 1998.



## **Functionality**

On June 23, 1997, functionality was completed on two reaches of Jenny Creek. Reach #1 (.5 miles) is an aspen dominated site and was rated as proper functioning condition.

Reach #2 (.25 miles) starts below the aspens and ends at the exclosure. This reach is dominated by rose, and some willow, with a herbaceous understory. It was rated as functional, but at risk with an upward trend. This part of the creek is deeply incised, the banks are about 20 feet high. The raw, higher bank slopes puts it in the functioning but at risk category. The actual creek channel is well vegetated and the streambed appears to be raising.

Though lentic functionality was not completed on the Lava Bed springs identified to be fenced, it was estimated, based on the field visit, these springs were nonfunctional:

Sheep Head Spring  
Un-named, N. of Sheep Head  
Turtle Rock  
Mustang

## **Trend**

Trend studies have not been read.

## **Establishment of Vegetation Objectives**

We are waiting for the appeal to be settled before vegetation objectives are written/established. The settlement might affect the grazing system and potential study site locations.

In the area of Shingle Spring, east side of the Seven Troughs Mountains, was identified as a potential location to establish a sage grouse study for either nesting and/or brood rearing habitat.

## ACTUAL USE

Livestock - Since the Multiple Use Decision period of use and use areas went into effect June of 1995, the following data reflects the use that took place after June. The AUMs column includes both BLM and Self-furnished AUMs.

YEAR	OPERATOR	SEASON OF USE	LVT #'s	AUMs	USE AREAS
	C-Punch				
95-96		6/1-10/15 <sup>1,2</sup>	735 Cows	3286	North
		10/16-2/29	630 Cows	2838	South
96-97		3/1-5/16 <sup>3</sup>	250 Cows	625	
		5/16	335 Cows	11	
		5/17-9/1	525 Cows	1864	
		9/2-11/1	440 Cows	738	
		11/2-11/5	405 Cows	53	
		11/6-11/10	380 Cows	62	
		11/11-11/15	190 Cows	31	
		11/16-2/28	190 Cows	662	North
97-98		3/1-5/1 <sup>4</sup>	200 Cows	408	
		5/2-11/15	400 Cows	2604	
		11/16-2/28	100 Cows	348	South

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<sup>1</sup> FMUD Grazing System went into effect 6/1/95

<sup>2</sup> Based on Grazing Authorization

<sup>3</sup> Based on Reported Actual Use

<sup>4</sup> Based on Grazing Authorization, haven't gotten 1997 actual use yet

YEAR	OPERATOR	SEASON OF USE	LVT #'s	AUMs	USE AREAS
	Delong				
95,96, 97,98		3/1-6/15 <sup>5</sup>	294 Cows	1034	North
		6/16-6/30	135 Cows	67	
		10/15-1/20	244 Cows	778	
		1/21-2/28	294 Cows	364	
	Cook				
95-96		12/26-2/29	2000 Sheep	868	North
		3/1-3/13	3000 Sheep	257	
		3/14-3/15	2000 Sheep	26	
96-97		12/19-3/13	2000 Sheep	1118	
97-98		12/20-2/28	2000 Sheep	934	
	Espil				
95-96		12/14-3/13	2400 Sheep	1436	North
96-97		12/15 -	2500 Sheep		
		3/13	2463 Sheep	1444	
97-98		12/14-2/28	2500 Sheep	1266	
	Dufurrena				
1996		1/2-2/29	1150 Sheep	446	North
		3/1-3/18	1350 Sheep	160	
96-97		12/22-2/28	1500 Sheep	681	
		3/1-3/21	1350 Sheep	186	
97-98		12/4-2/28	1500 Sheep	858	

<sup>5</sup> Based on Grazing Authorization and Actual Use

Wild Horse and Burros -

HA or HMA	YEA R	WILD HORSE #'S	BURRO #'S	WH AUMS	Burro AUMS
Antelope Range HA	1995	105	2	1,260	24
	1996	107		1,284	
	1997	111 ***		1,332	
Blue Wing Mtn. HMA	1995	30	28	360	336
	1996	33	31	396	372
	1997	37	34	444	408
Kamma Mountains HMA	1995	48		576	
	1996	71		852	
	1997	107 ***		1,284	
Lava Beds HMA	1995	300	28	3,600	336
	1996	333	31	3,996	372
	1997	370	34	4,440	408
Selenites HA	1995	53	16	636	192
	1996	59	18	708	216
	1997	65	20	540	240
Seven Troughs HMA	1995	292	69	3,504	828
	1996	324	77	3,888	924
	1997	360	85	4,320	1,020
Nightingales HMA	1995	211		2,532	
	1996	234		2,808	
	1997	260		3,120	
Shawave HMA	1995	292		3,504	
	1996	324		3,888	
	1997	360		4,320	

\* Includes 1 Mule

\*\* 169 animals were removed in February of 1998 between the 2 areas

Note 1996 numbers were based on the estimated 11% recruitment rate. The Antelope and Kamma's were censused in 1997, the rest were estimates.

## Climate

See Attachment 1 for a summary of precipitation from October 1994 to August 1997 for the Gerlach and Lovelock NOAA Weather Stations. We did not have the remaining 1997 data.

The Gerlach station is representative of the country north of Porter Spring. The Lovelock station would be representative of the area south of Porter Spring.

Data from the Blue Wing Remote Area Weather Station is included. It collects data from February to February. The 1997 data just goes to December. We were unable to access the historical data from this site. For now on this data will be collected monthly and placed in the same format as the NOAA data.

The 1994-1995 water year started dry with little to no fall moisture. There was good late winter/early spring moisture that was available for early vegetative growth. By July, precipitation was below average, so there was very little fall regrowth and soil moisture going into winter. Winter moisture was prevalent for the 1995-1996 water year until March for Lovelock and May for Gerlach. For the remainder of the water year, precipitation was substantially lower than average; which was illustrated by the most intensive fire season in northern Nevada since the mid-1980's. The 1996-1997 water year was almost a carbon copy of the previous two years, a wet winter and dry spring/summer for both stations, except for June where over an inch of rain fell.

The wet winters were advantageous for spring run-off and some soil moisture re-charge for plant growth. The vegetation production for the allotment was probably average to slightly above average: 200-400 pounds per acre for the valley bottoms and 800 to 1,000 pounds at the higher elevations.

## **Evaluation Of Short Term Allotment Objectives & Standards**

1. Utilization on key riparian plant species shall not exceed 30%. Maintain a satisfactory age class, form class, and be self perpetuating in the following areas:

Jenny Creek  
Missouri Creek (T29N, R24E, Sec 2&3)  
Mustang Spring (T32N, R 26,27E, Sec 25,36, & 31)  
Cow Creek  
Egbert Canyon  
Stonehouse Canyon

1995- Met on Jenny Creek, not met in Stonehouse Canyon or the headwaters. The other sites were not monitored.

1996- These sites were not monitored.

1997- Met on Jenny Creek, Mustang/Eagle Rock Springs area, Cow Creek and Stonehouse Canyon. Egbert Canyon and Missouri Creek were not monitored.

2. Total utilization of plant species such as willow, aspen, sedge, bulrush, cattails, and Nevada bluegrass in approximately 358 acres of riparian wetland, and meadow habitat shall not exceed 50% utilization. These sites are adjacent to wetlands and pools like Sulphur wetlands and meadows such as Rabbithole and Last Chance Spring.

1995- Not met at any sites monitored.

1996- Met for the one site monitored in the Sahwave's. Based on ocular estimates met around Last Chance Spring, Alson Spring, Mule Canyon, and Juniper Canyon.

1997- Was acceptable at mid-seasons checks; for October dates it was met in American Canyon, Cow Creek area, Mustang to Eagle Rock Springs, Stonehouse Canyon and a site in the Selenites; almost met at Double Spout Spring and a site in the Selenites; and exceeded at a meadow head of Wildcat Canyon and near Luxor Peak-2 sites.

Wild horses made the use at the Wildcat Canyon site. Livestock, or signs, were not seen in this area during the summer. For the Selenite area livestock made most of that use. No wild horses or burros, or signs, were seen in this area.

3. Total utilization shall not exceed the allowable use on the following wildlife key species\*:

Antelope bitterbrush	50%
Serviceberry	40%
Snowberry	40%
Winterfat	50%
Cinquefoil	20%
Sandberg bluegrass	30%
Buffaloberry	50%
Ephedra	50%

\* Note - this is a generic list. There are no known sites with buffaloberry or cinquefoil. There is less than 20 acres of serviceberry and snowberry in the allotment, located on the top of Seven Troughs and Selenite Mountain Ranges. Sandberg bluegrass is considered an upland plant and should have a 50% utilization level.

1995- Met

1996- Met

1997- Met

4. Utilization of key plant species on upland rangeland habitat shall not exceed 50% during the growing season and 60% yearlong.

1995- Monitoring was done, but the data was lost.

1996- Met except for one site near Porter Spring where exclusive burro use was in the heavy category. No livestock, or signs, were observed in this area.

1997- Met at all sites monitored except for around Juniper Spring.

5. Standards for Rangeland Health

- Soils: Based on field observations while doing utilization transects and use supervision it would appear this standard is met. This was indicated by surface litter and basal/canopy cover is appropriate for site potential; plant communities are diverse and vigorous with evidence of recruitment and soil crusting /compaction is not evident.

- Riparian/Wetlands:

\* Sinuosity, width/depth ratio and gradient are adequate to dissipate stream flow without excessive erosion or deposition would apply to Jenny Creek. It is met for Reach 1, but not for Reach 2 since it is deeply incised.



\* Riparian vegetation is adequate to dissipate high flow energy and protect banks from excessive erosion was met for Jenny Creek. For the four springs in the Lava Bed this indicator is not met. None of the other springs or seeps in the allotment were evaluated.

\* Plant species diversity is appropriate to riparian-wetland systems. Met for Jenny Creek. Not determined allotment wide for springs/seeps.

- Water Quality: No monitoring done.

- Plant and Animal Habitat: Communities of native plant species are healthy, productive and diverse based on the site potentials. The indicators, such as - vegetative mosaics; good representation of life forms and numbers of species; diversity of height, size and distribution of plants; and seed production are present. This is based on field observations while doing utilization and staking projects.

- Special Status Species Habitat: The two animal species that could occur would be the burrowing owl and pygmy rabbit. Based on the condition of the habitat requisites for these species, as described above, this standard is met.

## Projects

Two priority projects were outlined in the Evaluation - the Blue Wing/Majuba Fence and protection of the four springs in the Lava Beds.

The Blue Wing/Majuba fence is staked and the EA process is started. Additional coordination is required with the wild horse groups and an archeological survey is required.

The Lava Bed springs (Sheep Head, Un-named, Turtle Rock, and Mustang) have had the survey and design completed and the archeological survey completed. The NEPA documentation is pending..

All wildlife exclosures were inspected and necessary repairs made.

## Recommendations

### 1. Livestock and Wild Horse and Burro Numbers:

Maintain C-Punch livestock and wild horse and burro numbers at the Intermediate Reduction level of the Final Multiple Use Decision, FMUD (the other operators will remain the same):

836 cow/calves 11/1-10/31 8,226 AUMs

643 Wild Horses and Burros 7,716 AUMs

<u>Herd Management Area</u>	<u>Wild Horses</u>	<u>Burros</u>	<u>Total</u>
Blue Wing	36	28	64
Kamma Mountains	77	0	77
Lava Beds	148	16	164
Seven Troughs	156	46	202
Sahwave-Nightingale	<u>136</u>	<u>0</u>	<u>136</u>
Total	553	90	643

**Rationale: Current management is coming close to meeting the short term objectives. C-Punch is not running full numbers because of the density of wild horses and burros. With out gap fencing, they would not be able to maintain the 5% head drift allowance.**

**The 1998 scheduled gather is still required. Maintain the 3-year gather schedule as outlined in the FMUD.**

**Once C-Punch's herd is around 800 head and wild horse and burro numbers are approximately 600 animals, then monitoring data will determine future adjustments.**

2. Changing C-Punch season-of-use to winter use:

Do not convert the existing year-long grazing system to winter use.

**Rationale: C-Punch has kept drift below the 5% limit as stated in the FMUD.**

3. Modify conditions of John Espil's Permit to read:

Flexibility will include authorization of fewer numbers of sheep during the 12/1 to 3/15 use period, and fewer numbers for varied time frames from 3/16 to 5/31. The permittee will coordinate with BLM before the adjustments are made.

**Rationale: The intent of the Final Evaluation and Multiple Use Decision was to continue this historical use but was not described in detail in either document, nor was it incorporated in the subsequent Term Permit. A new Term Permit would be offered with the above flexibility statement. No other changes are anticipated.**

4. Modify the wildlife key plant species list:

Remove buffaloberry, cinquefoil, serviceberry, and snowberry from the list.

**Rationale: There are no known sites with buffaloberry and cinquefoil. There is little potential for serviceberry and snowberry to occur or monitor.**

5. Additional Projects:

- Reconstruct the lower portion of Egbert Pipeline and add an additional trough east of the proposed Blue Wing/Majuba Fence. This would provide a water source on both sides of the fence.
- Survey and design strategic gap fences along the boundary of the North and South Use Areas. These fences are required to ensure compliance with the FMUD. The fences would be coordinated with the interest groups.
- Drill a well in the northern portion of Sage Hen Valley. There is a dearth of water in this portion of the allotment. A specific site has not been identified. Until the water right issues are settled the well can not be developed. In the mean time a site could be picked and a well site investigation done.
- Continue the development of the Empire Well and Pipeline (T31N, R23E, Sec 26)

Rich Adams  
3/26/98

## Appendix 1

AGSP	bluebunch wheatgrass
CAREX	sedge species
ELCI	Great Basin wildrye
EPHEDRA	green mormon-tea
EULA	winterfat
HOLOD	oceanspray
JUNCUS	rush species
ORHY	Indian Ricegrass
POA	bluegrass
POTRT	quaking aspen
PUTR	antelope bitterbrush
RIBES	currant
SIHY	bottlebrush squirreltail
STTH2	Thurber needlegrass

Precipitation Data - 10/94 - 4/97 for Gerlach and Lovelock NOAA Weather Stations															
	Years	Oct	Nov	Dec	Jan	Feb	March	April	May	June	July	Aug	Sept	Total	Annual Average
Gerlach	94-95	0.17	2	0.76	2.75	0.37	1.11	1.53	2.93	1.16	0.73	0	0.15	13.66	7.46
	95-96	0	0.3	1.76	2.01	1.13	1.52	1.29	0.93	0.46	0.31	0.03	0.43	10.17	
	96-97	0.7	0.66	2.51	2.77	0.35	0.41	0.74	0.13	1.37	0.66	0.03			
		Growing Season Ppt March-August													Growing Season Avg
Gerlach	94-95						1.11	1.53	2.93	1.16	0.73	0		7.46	3.52
	95-96						1.52	1.29	0.93	0.46	0.31	0.03		4.54	
	96-97						0.41	0.74	0.13	1.37	0.66	0.03		3.34	
															Annual Average
Lovelock	94-95	0.31	1.66	0.81	1.06	0.73	0.84	0.75	1.87	1.5	0.24	0	0	9.77	5.41
	95-96	0	0	1.14	1.3	0.61	0.27	0.35	0.47	0.87	0.13	0.14	0.03	5.31	
	96-97	0.48	0.9	1.12	1.52	0.04	0.1	0.34	0.04	1.05	0.07	0.05			
															Growing Season Avg
Lovelock	94-95						0.84	0.75	1.87	1.5	0.24	0		5.2	2.44
	95-96						0.27	0.35	0.47	0.87	0.13	0.14		2.23	
	96-97						0.1	0.34	0.04	1.05	0.07	0.05		1.65	
Note: Gerlach January 95-96, and Lovelock January 94-95 were missing 1-9 days															
Blue Wing Remote Area Weather Station															
	2/25/96-2/24/97			4.29											
	2/25/97-12/14/97			4.21											

## Wild horse

The 1994 FNMDS established the ~~APM~~ levels on several flawed ~~as~~ Assumptions. We did not support the assumption that a foal equaled an AUM, weight ~~to~~ use pattern ~~mapping~~ data or proportional allocation of forage based on 1981 numbers.

~~It was~~ Carry Capacities ~~as~~ of the 1994 FNMDS were also flawed by the data collected in the 1995 gathers. BHM estimated over 1000 additional head of horses on the allotment. These animals or AUMs were not considered in the calculations for FNMDS ~~of~~ livestock stocky levels or AUMs.

We would encourage the District to re-evaluate the allotment. ~~---~~

Sunny





DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES  
COMMISSION FOR THE  
PRESERVATION OF WILD HORSES

123 W. Nye Lane, Room 248  
Carson City, Nevada 89706-0818  
Phone (702) 687-1400 • Fax (702) 687-6122

April 2, 1998

Colin P. Christensen,  
ADM, Renewable Resources  
BLM-Winnemucca Field Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445

Dear Mr. Christensen,

Thank you for the opportunity to review and comment on the Blue Wing/Seven Troughs Allotment monitoring information from 1995 through 1997.

The 1994 FMUD established the AML levels on several flawed assumptions. We did not support the assumptions that a foal equalled an AUM, which is in direct conflict with your approved land use plan. We also did not support weight averaging and use pattern mapping data or proportional allocations of forages based on 1991 numbers.

Carrying capacities of the 1994 FMUDs were also flawed because the data collected in the 1995 gathers contradicts the assumptions that decisions in the FMUD were based on. BLM estimated over 1000 additional head of horses on the allotment. These animals or AUMs were not considered in the calculations for FMUD and livestock levels or AML.

We would encouraged the District to re-evaluate the allotment. If you have any questions, please feel free to call.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB  
Administrator