

m 3/16/89 Dawn  
FJD  
Rose

March 16, 1989

To: Johanna  
From: Rose  
Re: Sonoma-Gerlach AEs and Agreements - DRAFT comments to BLM

I'd like NDOW and Dawn Lappin to review this draft. My analysis is hampered by the lack of specific knowledge of most of these allotments and is based mostly on the information provided by BLM. I haven't gotten a copy of the documents on Soldier Meadows to review yet. Main issues for us to raise with BLM:

1. LUP objectives must be included in Agreement.
2. AMPs or agreements? Or agreements to be incorporated into AMPs?
3. applaud BLM and permittees for cuts, especially deep cuts.
4. specific plans to protect riparian areas.
5. actual use reports must be required.
6. enough monitoring to evaluate LUP objectives.
7. support BLM dividing increases among livestock, wildlife, and wild horses.
8. support increases being phased in over 5 years.
9. no range improvement public funds unless livestock at the carrying capacity. Think up better reasons!?
10. what do we request in terms of utilization requirements?

I-2 & I-3.

Buffalo Hills/Calico. 21.3% increase over five years.

problems:

1. 4/1 turn on date - may be too early.
2. dropped objectives 2.a, 2.b, 2.c, 2.d, 2.e, and 2.f - improve stream habitat, wetlands, improve riparian habitat on 6 creeks, protect sagegrouse, maintain or improve aspen woodlands and mtn. mahogany, wildlife forage and habitat, wild horse forage and habitat, and water quality standards on 7 creeks.
3. monitoring is minimal.
4. ST and LT objectives  
met - 3 partial  
not met - 7  
insufficient data - 6
5. AMP?
6. riparian - no date for fencing riparian areas on Red Mountain, Cottonwood, Wagontire, and Donnelly Creeks - "in accordance with Winnemucca District Riparian Implementation Schedule." What is it?

our requests to BLM:

1. discuss turnon dates - change to "range ready" or boot stage.
2. include all LUP objectives in Agreement and new or revised AMP.
3. specific commitment to monitoring/Spang's four types and other monitoring necessary to carry out LUP objectives in the Agreement and in the AMP.
4. more specific plans to meet all ST and LT objectives in the

Agreement and in the AMP.

5. develop or revise and update AMP by a certain date which would include LUP objectives, monitoring, and actions to reach objectives.

6. specific dates to fence riparian areas. Specific plans to protect other riparian and wetland acres.

7. other

- quantify grazing capacity estimates

- other things BLM is supposed to be doing in the LUP process

8. make sure the increase is being phased in over 5 years with other adjustments to be based on monitoring at 3 and 5 year intervals.

9. good that BLM is dividing the increase among cows, wildlife and wild horses.

10. don't know if LCT are on the allotments? If so, BLM must comply with ESA.

M-9.

Coal Canyon-Poker. same

problems:

1. yearlong use - cattle in summer/sheep in winter.

2. overuse of Rocky Canyon Creek - no monitoring.

3. monitoring - insufficient to evaluate reaching most objectives - low priority.

4. trespass problems

5. one of three permittees doesn't use permit every year.

our comments to BLM:

1. good - kept all objectives.

2. low priority for us, if BLM will protect Rocky Canyon Creek and if some monitoring is regularly scheduled in order to evaluate reaching objectives.

M-6.

Coyote. 62% voluntary reduction.

problems:

1. no actual use data.

2. omitted objective #C on wildlife forage allocations and habitat improvement requirements.

3. does the voluntary reduction preclude future adjustments based on monitoring?

4. justification for "vegetation manipulation" on Duck Flat?

5. what's happening with the 188 acres of wetland riparian habitat?

6. why such a large reduction with overall light to moderate use?

our comments to BLM:

1. require actual use data.

2. revise Agreement to include Obj. #C.

3. increase monitoring to evaluate reaching objectives.

4. no "vegetation manipulation" without justification.

5. include specific actions planned to protect 188 wetland acres.

M-8.

Leadville - 59% reduction.

problems:

1. lots of non-use, no actual use data.
2. what's happening with the 424 acres of wetlands habitat?
3. will voluntary reductions preclude adjustments for the next five years based on monitoring?
4. eliminated several objectives.

our comments to BLM:

1. require actual use data.
2. revise Agreement to include all LUP objectives.
3. include specific actions planned to protect 424 wetland acres.
4. develop or revise AMP by a certain time.

M-3 and M-4.

Melody & Harmony.

problems:

1. variable season of use - apparently little or no control over livestock numbers, turn on and turn off dates.
2. grazing system not being followed.
3. crested wheat grass is key species?!
4. little monitoring and objectives not being met.
5. many objectives dropped from Agreement.
6. voluntary reduction in Melody, but not in Harmony. Why?

our comments to BLM:

1. develop or revise AMP with specific requirements for seasons of use and a grazing system. If not followed, eliminate permit.
2. include all LUP objectives in Agreement.
3. require reductions in livestock use in Harmony or 2 year evaluation on which to base adjustments.
4. expand monitoring to evaluate whether objectives are being met.
5. combine allotments?

I-4.

Rodeo Creek - 10% voluntary reduction.

problems:

1. season long use.
2. no AMP.
3. no monitoring data on most objectives.
4. increased winter livestock. No adjustment based on monitoring planned for five years, but no assurance that wildlife and other values may be damaged by this increased use.

our comments to BLM:

1. develop or revise AMP.
2. expand monitoring data to evaluate reaching alternatives.

3. change Agreement to provide for adjustments before the end of the five-year period, if monitoring documents unacceptable impacts of increased winter livestock use.
4. good - Agreement kept LUP objectives.

M-1.

Sonoma - apparent 2% increase.

problems:

1. Sonoma Creek and Elbow Canyon heavily utilized.
2. most objectives not met.
3. insufficient data to evaluate 4 objectives.
4. AE says allotment is overobligated.
5. What is the condition of 223 acres of wetland riparian habitat?

our comments to BLM:

1. support fencing of Sonoma Creek. Will fence be built in 1989?
2. more monitoring to evaluate reaching objectives.
3. reductions are needed.
4. good - Agreement kept LUP objectives.
5. Specific plans to protect 223 acres of wetland riparian habitat are needed in the Agreement.
6. Develop or update an AMP by a specific time.

M-2.

Rock Creek - same.

problems:

1. 1972 AMP never followed.
2. current grazing system "not documented."
3. most objectives not met or insufficient data to evaluate.
4. many objectives dropped from Agreement.
5. no change in livestock numbers or season of use despite problems.
6. no specific actions planned for 120 acres of wetland riparian habitat.
7. did not evaluate ST Objective #C limiting utilization on Rock Creek to 30%.

our comments to BLM:

1. revise AMP.
2. expand monitoring to evaluate reaching objectives.
3. include all LUP objectives in Agreement.
4. include specific actions to protect 120 acres of wetland riparian habitat.
5. evaluate ST Obj.#C on Rock Creek. Include specific protection for Rock Creek in Agreement and in AMP.
6. initiate changes in livestock numbers and season of use.

I-5 & I-6.

Blue Wing & Seven Troughs - 10% reduction for one year.

problems:

1. heavy livestock use around riparian areas and on uplands.
2. Jenny Creek condition is poor - little monitoring.
3. dropped most LUP objectives.
4. most objectives not met or insufficient data to evaluate.
5. grazing plan in AMP not being followed.
6. range improvements not maintained.
7. wildlife populations depressed.
8. poor season of use.

our comments to BLM:

1. credit to permittee for agreeing to fence Jenny Creek. When?
2. include time certain for BLM to fence other riparian areas.
3. include LUP objectives in revised AMP and in agreement.
4. expand monitoring to evaluate reaching all objectives in these I allotments.
5. commit to use monitoring to further reduce livestock numbers as necessary.
6. require permittee to follow grazing plan and maintain range improvements or further reduce livestock numbers.
7. specific actions planned to improve wildlife habitat.
8. revise seasons of use and grazing system to improve grazing management.

I-7 & I-8.

Clear Creek & Dolly Varden.

problems:

1. Is 1987 agreement being followed?
2. Is there any use at all?

M-5.

Goldbanks - same.

problems:

1. most objectives not being met or data insufficient.
2. Agreement dropped many LUP objectives.
3. CRMP recommended lots of range improvements, no change in grazing management or numbers.
4. Agreement not signed (printout date 12/14/88).
5. 3 range improvements planned (who pays?)
6. no riparian fencing in Agreement (contradicts printout) and recommendation to fence Panther Canyon.

our comments to BLM:

1. include all LUP objectives in Agreement and in revised AMP.
2. expand monitoring to evaluate reaching objectives.
3. we object to public funds for range improvements without improvements in grazing management.
4. Agreement should include fencing Panther Canyon at a time certain.

M-7.

Rye Patch.

problems:

1. checkerboard land.
2. subdivision around Rye Patch Reservoir.
3. no livestock use?

our comments to BLM:

1. low priority for us.