



United States Department of the Interior

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

AUG 22 1996

In Reply Refer To:
(NV-241.3)
4400

a; Bullhead.st
8-22-96

Commission for the Preservation of Wild Horses
255 West Moana Lane
Suite 207A
Reno, NV 89509

Dear Ms. Barcomb:

On August 21, 1996, a meeting was held in Reno to discuss the additional forage and how it is to be allocated on the Bullhead Allotment. Roy Leach of your agency, requested the monitoring data that supports the additional forage.

I'm including the additional data from 1993-1995 for upland, streambank riparian and wetland riparian habitats. The enclosed Key Forage Plant Method Forms are for the upland habitats in which key areas have been established. The use pattern maps are of the wetland riparian and streambank riparian habitats in Kinney, Upper Kelly, and Lower Kelly Pastures. Utilization data from 1983-1991 was presented in the allotment evaluation which you received in 1994.

I'm also including the Desired Stocking Rate Calculations for all pastures throughout the monitoring period (1983-1995).

If you have any questions, feel free to contact Gene Seidlitz at (702) 623-1500.

Sincerely yours,

Colin P. Christensen
ADM, Renewable Resources



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Winnemucca District Office
5100 East Winnemucca Boulevard
Winnemucca, Nevada 89445
702-623-1500

AUG 05 1996

In Reply Refer To:
4160
(NV-241.3)

Nevada First Corporation
P.O. Box 490
Winnemucca, NV 89445

Dear Mr. Bengochea:

On August 25, 1994, the Bureau of Land Management issued a Final Multiple Use Decision for the Bullhead Allotment. Monitoring data from 1983 to 1992 was analyzed, interpreted and evaluated for this decision. This decision called for a decrease in active preference and set the Appropriate Management Level (AML) for wild horses at 140. On September 28, 1994, we received appeals from you on the livestock and wild horse portions of this decision.

On January 16, 1996, I received an allotment management proposal for the Bullhead Allotment from you. This started the negotiations for the withdrawal of your appeals.

Several meetings and discussions have taken place and I'm proposing to meet with the Nevada First Corporation, Wild Horse Organized Assistance, Commission for the Preservation of Wild Horses, and Nevada Division of Wildlife to discuss the allocation of additional forage.

A meeting has been set up for August 21, 1996, at 10:00 a.m. at the State Office in Reno.

If you have any questions, feel free to contact Gene Seidlitz at (702) 623-1500.

Sincerely yours,

Colin P. Christensen
Associate District Manager
Renewable Resources

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District Wmca	(2) Date 3-7-95	(3) Observer SEIDLITZ / FERRARO (IRC)		
(4) Resource Area A-D	(5) Allotment Bullhead	(6) Operator/Allottee NFC	(7) Field Name or No. Dry Hills 203	
(8) Vegetation Type	(9) Range Site	(10) Kind(s) & Class(s) of Grazing Animal(s) Cow/Calf		
(11) Use Period WINTER 94	(12) Grazing Management System			

(13) Transect Location/Key Area No. **203** *Livestock & Wild Horses Only*

(14) Use Rating of Current Year's Growth	Mid-Point (x)	STTHL Key Species		SIH4 Key Species		AGOSP Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>In Use (0): The rangeland shows no evidence of use by grazing animals.</small>							
<small>Light (1-20%): The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.</small>	10	□	66	□	80	"	
<small>Light (21-40%): The rangeland may be topped, grazed, or grazed in patches. The low value herbaceous plants are grazed and 60 to 80 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear cropped or browsed in areas and 25 to 40 percent of the available leader growth of the key browse plants has been removed.</small>	30	"	120	"	60		
<small>Medium (41-60%): The rangeland appears entirely covered as uniformly as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 41 to 60 percent of the available leader growth of key browse plants has been removed.</small>							
<small>Heavy (61-80%): The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Stems of dicotyledonous grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are browsed and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on key browse plants. Approximately 61 to 80 percent of the available leader growth of the key browse plants has been removed.</small>							
<small>Severe (81-100%): The rangeland has a worn appearance and there are indications of repeated coverage. There is no evidence of reproduction of current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of productive grasses are grazed to the soil surface. There is no evidence of terminal buds and 81-100% of available leader growth on the key browse plants has been removed. Some, and often much, of the one and two year's growth of the browse plants has been utilized. Grazing is readily observed, and the browse plants are more frequently browsed.</small>							

TOTAL	10	180	10	140	4	20
Average Utilization = $\frac{\sum fx}{\sum f}$ *	18%		14%		5%	

REMARKS (Use back of sheet) **Scattered Blue bunch w/ NO-TO signature**

* Where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District WMCA	(2) Date 8-10-93	(3) Observer SEIDLITZ
(4) Resource Area P-D	(5) Allotment Bullhead	(6) Operator/Allottee NFC
(8) Vegetation Type	(9) Range Site	(7) Field Name or No. Dry Hills 202
(11) Use Period Spring	(10) Kind(s) & Class(es) of Grazing Animal(s) cow/calf Horses	
(12) Grazing Management System		
(13) Transect Location/Key Area No. 202		

(14) Use Rating of Current Year's Growth	Mid-Point (x)	STHZ Key Species		SIH4 Key Species		GRHY Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>To be used: The rangeland shows no evidence of use for grazing animals.</small>							
<small>Class (10-20): The rangeland has the appearance of very light grazing. The low value forage plants have been topped or slightly used. Current seedlings and young plants of low forage species are little disturbed. The available leaders of low browse plants are little disturbed.</small>	10	5	60	10	90	10	100
<small>Class (21-30): The rangeland may be topped, at least, or grazed in patches. The low value forage plants are grazed and 50 to 80 percent of the number of current seedlings of low forage species remain intact. Some young plants of the low species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear grazed or browsed in patches and 25 to 50 percent of the available leader growth of the low browse plants has been removed.</small>	30	2	90		30		
<small>Class (31-40): The rangeland appears entirely grazed or utilized as natural forage and utilization will allow. 15 to 25 percent of the number of current seedlings of low forage species remain intact. In more than 50 percent of the number of low value forage plants are utilized. Browse plants appear grazed and 50 to 75 percent of the available leader growth of low browse plants has been removed.</small>	50		50				
<small>Class (41-50): The rangeland has the appearance of complete search. Low forage species are almost completely utilized with less than 10 percent of the current seedlings remaining. Some of the current seedlings are grazed. More than 10 percent of the number of low value forage plants have been utilized. The preferred browse plants are grazed and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on low browse plants. Approximately 50 to 80 percent of the available leader growth of the low browse plants has been removed.</small>							
<small>Class (51-60): The rangeland has a worn appearance and there are indications of repeated overgrazing. There is no evidence of reproduction of current seedlings of low forage species. Low forage species are completely utilized. The remaining stems of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 100% of available leader growth on the low browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Grazing is readily apparent, and the browse plants are more frequently broken.</small>							
TOTAL		10	200	10	120	10	100
Average Utilization = $\frac{\sum fx}{\sum f}$		20%		12%		10%	

REMARKS (Use back of sheet) MOVED Both cages

* Where f = the frequency or number of observations within each class interval (f column),
x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District Wmca	(2) Date 4-24-96	(3) Observer SEIDLITZ
(4) Resource Area	(5) Allotment Bullhead	(6) Operator/Allottee NFC
		(7) Field Name or No. Dry Hills 202
(8) Vegetation Type	(9) Range Site	(10) Kind(s) & Class(s) of Grazing Animal(s) Wild Horses / cattle
(11) Use Period Winter ⁹⁵ / Early Spring ⁹⁶	(12) Grazing Management System	
(13) Transect Location/Key Area No. 202		

(14) Use Rating of Current Year's Growth	Mid-Point (x)	5THZ Key Species		51H4 Key Species		Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>Class 1 (1-20%): The rangeland shows no evidence of use by grazing animals.</small>							
<small>Class 2 (21-40%): The rangeland has the appearance of very light grazing. The low herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of low herbaceous species are little disturbed. The available leaders of low browse plants are little disturbed.</small>	10			□	80		
<small>Class 3 (41-60%): The rangeland may be topped, mowed, or grazed in patches. The low value herbaceous plants are grazed and 50 to 80 percent of the number of current seedstalks of low herbaceous plants remain intact. Most young plants of the low species are damaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear topped or browsed in patches and 25 to 40 percent of the available leader growth of the low browse plants has been removed.</small>	20	..	40	..	40		
<small>Class 4 (61-80%): The rangeland appears severely covered as uniformly as natural features and facilities will allow. About 25 percent of the number of current seedstalks of low herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 50 to 80 percent of the available leader growth of low browse plants has been removed.</small>	50	□	400				
<small>Class 5 (81-100%): The rangeland has the appearance of complete barrenness. Low herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Stems of dicotyledonous grasses are visible. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are topped and some plant stems may be slightly broken. Nearly all available leaders are used and few residual buds remain on low browse plants. Approximately 80 to 90 percent of the available leader growth of the low browse plants has been removed.</small>							
<small>Class 6 (100%): The rangeland has a snow appearance or there are indications of repeated coverage. There is no evidence of reproduction of current seedstalks of low herbaceous species. Low herbaceous forage plants are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 10-100% of available leader growth on the low browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Grazing is readily apparent, and the browse plants are more frequently broken.</small>							
TOTAL		10	440	10	120		
Average Utilization = $\frac{\sum fx}{\sum f} *$			44%		12%		

REMARKS (Use back of sheet) Scattered ORH4 (GREEN-MP 4-8")

* where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District WMCA	(2) Date 9-21-95	(3) Observer SEIDLITZ		
(4) Resource Area P-D	(5) Allotment Bullhead	(6) Operator/Allottee NFC	(7) Field Name or No. U Kelly 401	
(8) Vegetation Type		(9) Range Site	(10) Kind(s) & Class(s) of Grazing Animal(s) cow/calf	
(11) Use Period SUMMER		(12) Grazing Management System		
(13) Transect Location/Key Area No. LIPPER KELLY				

(14) Use Rating of Current Year's Growth	Mid-Point (x)	FEID Key Species		S, H, Y Key Species		Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>In the 10%: The rangeland shows no evidence of use by grazing animals.</small>							
<small>Stage 10(20%): The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.</small>							
<small>Stage 20(30%): The rangeland may be topped, skinned, or grazed in patches. The low value herbaceous plants are grazed and 50 to 80 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are damaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear topped or browsed in places and 75 to 80 percent of the available leader growth of the key browse plants has been removed.</small>	30	!!	60	"	60		
<small>Stage 30(40%): The rangeland appears evenly covered as uniformly as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 40 to 50 percent of the available leader growth of key browse plants has been removed.</small>	50	☐	350	f.	300		
<small>Stage 40(50%): The rangeland has the appearance of complete wear. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Stems of indigenous grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are topped and some plant stems may be slightly browsed. Nearly all available leaders are used and low terminal buds remain on key browse plants. Approximately 80 to 90 percent of the available leader growth of the key browse plants has been removed.</small>	70	.	70	"	140		
<small>Stage 50(60%): The rangeland has a worn appearance and there are indications of repeated coverage. There is no evidence of reproduction of current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 100% of available leader growth on the key browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Grazing is readily apparent, and the browse plants are more frequently browsed.</small>							
TOTAL		10	480	16	500		
Average Utilization = $\frac{\sum fx}{\sum f} *$		48%		50%			

REMARKS (Use back of sheet)

* Where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District <i>W MCA</i>	(2) Date <i>10-18-94</i>	(3) Observer <i>SEIDLITZ</i>		
(4) Resource Area <i>P-D</i>	(5) Allotment <i>B. HEAD</i>	(6) Operator/Allottee <i>NFC</i>	(7) Field Name or No. <i>U. KELLY 401</i>	
(8) Vegetation Type	(9) Range Site	(10) Kind(s) & Class(s) of Grazing Animal(s) <i>Cow/Calf</i>		
(11) Use Period <i>Summer</i>	(12) Grazing Management System			
(13) Transect Location/Key Area No.				

(14) Use Rating of Current Year's Growth	Mid-Point (x)	FCID Key Species		SIH4 Key Species		Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>No Use (0): The rangeland shows no evidence of use by grazing animals.</small>		7		→			
<small>Slight (1-2): The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.</small>	10	→	50	→	50		
<small>Light (3-4): The rangeland may be topped, mowed, or grazed in patches. The low value herbaceous plants are ungrazed and 60 to 80 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear trampled or browsed in patches and 20 to 40 percent of the available leader growth of the key browse plants has been removed.</small>							
<small>Medium (5-6): The rangeland appears uniformly covered as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 40 to 60 percent of the available leader growth of key browse plants has been removed.</small>							
<small>Heavy (7-8): The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Stems of dicotyledonous grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are topped and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on key browse plants. Approximately 60 to 80 percent of the available leader growth of the key browse plants has been removed.</small>							
<small>Severe (9-10): The rangeland has a worn appearance and there are indications of repeated coverage. There is no evidence of reproduction of current seedstalks of key herbaceous species. Key herbaceous forage plants are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 100% of available leader growth on the key browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Damage is readily apparent, and the browse plants are more frequently broken.</small>							
TOTAL		10	50	10	50		
Average Utilization = $\frac{\sum fx}{\sum f}$ *		$\frac{50}{10}$	5%	$\frac{50}{10}$	5%		

REMARKS (Use back of sheet) *Good browse and forage production - good plant vigor*

* Where f = the frequency or number of observations within each class interval (f column),
x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District Wmca	(2) Date 8-29-95	(3) Observer DeForest - SEIDLITZ		
(4) Resource Area P-D	(5) Allotment Bullhead	(6) Operator/Allottee NFC	(7) Field Name or No. KINNEY 601	
(8) Vegetation Type		(9) Range Site	(10) Kind(s) & Class(s) of Grazing Animal(s) Cow/calf	
(11) Use Period Summer		(12) Grazing Management System		
(13) Transect Location/Key Area No. 601				

(14) Use Rating of Current Year's Growth	Mid-Point (x)	S, H, Y Key Species		FEID Key Species		Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
No Use (0): The rangeland shows no evidence of use by grazing animals.							
Flight (1-25%): The rangeland has the appearance of very light grazing. The low herbaceous forage plants may be topped or slightly used. Current seedheads and young plants of low herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.	10	4	60	2	50		
Light (26-50%): The rangeland may be topped, trimmed, or grazed in patches. The low value herbaceous plants are grazed and 50 to 80 percent of the number of current seedheads of low herbaceous plants remain intact. Most young plants of the low species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear stripped or browsed in patches and 25 to 40 percent of the available leader growth of the low browse plants has been removed.	30	4	120	3	90		
Moderate (51-75%): The rangeland appears evenly covered as uniformly as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedheads of low herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear evenly utilized and 40 to 60 percent of the available leader growth of low browse plants has been removed.	50			2	100		
Heavy (76-90%): The rangeland has the appearance of complete search. Low herbaceous species are almost completely utilized with less than 10 percent of the current seedheads remaining. Stems of dicotyledonous grasses are visible. No more than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are grazed and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on low browse plants. Approximately 60 to 80 percent of the available leader growth of the low browse plants has been removed.							
Severe (91-100%): The rangeland has a mown appearance and there are indications of repeated coverage. There is no evidence of production of current seedheads of low herbaceous species. Low herbaceous forage species are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 100% of available leader growth on the low browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Stems are readily removed, and the browse plants are more frequently grazed.							
TOTAL		10	180	10	240		
Average Utilization = $\frac{\sum fx}{\sum f}$ *		18%		24%			

REMARKS (Use back of sheet) **EXCELLENT PRODUCTION / HIGH / GOOD GROUND COVER**

* Where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District WMCA	(2) Date 10-13-94	(3) Observer SEIDLITZ
(4) Resource Area P-D	(5) Allotment B. HEAD	(6) Operator/Allottee NFC
(8) Vegetation Type	(9) Range Site	(7) Field Name or No. KINNEY 601
(11) Use Period SUMMER	(10) Kind(s) & Class(s) of Grazing Animal(s) COW/CALF	(12) Grazing Management System

(13) Transect Location/Key Area No.
601

(14) Use Rating of Current Year's Growth	Mid-Point (x)	S/HY Key Species		F/ID Key Species		Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>No Use (0): The rangeland shows no evidence of use by grazing animals.</small>		□		□			
<small>Light (1-20%): The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.</small>	0	••	20	••	30		
<small>Light (21-40%): The rangeland may be topped, skinned, or grazed in patches. The low value herbaceous plants are ungrazed and 50 to 80 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear cropped or browsed in places and 25 to 40 percent of the available leader growth of the key browse plants has been removed.</small>							
<small>Medium (41-60%): The rangeland appears entirely covered as uniformly as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 41 to 60 percent of the available leader growth of key browse plants has been removed.</small>							
<small>Heavy (61-80%): The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Shoots of rhizomatous grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are heged and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on key browse plants. Approximately 61 to 80 percent of the available leader growth of the key browse plants has been removed.</small>							
<small>Severe (81-100%): The rangeland has a worn appearance and there are indications of repeated overgrazing. There is no evidence of reconstruction of current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 81-100% of available leader growth on the key browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Mounding is readily apparent, and the browse plants are more frequently trampled.</small>							
TOTAL		10	20	10	30		
Average Utilization = $\frac{\sum fx}{\sum f}$ *		$\frac{20}{10}$	20%	$\frac{30}{10}$	30%		

REMARKS (Use back of sheet) **Good plant vigor & production**

* Where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District <i>WMCA</i>	(2) Date <i>8/11/53</i>	(3) Observer <i>Stockdale</i>		
(4) Resource Area <i>P-D</i>	(5) Allotment <i>Bullhead</i>	(6) Operator/Allottee <i>UTC</i>	(7) Field Name or No. <i>1st Cont Reg'd</i>	
(8) Vegetation Type <i>Arct/asp/dec</i>	(9) Range Site <i>025 X AUN Camp 10-12</i>	(10) Kind(s) & Class(s) of Grazing Animal(s) <i>Cattle and horse</i>		
(11) Use Period	(12) Grazing Management System			

(13) Transect Location/Key Area No.
301 No line

(14) Use Rating of Current Year's Growth	Mid-Point (x)	AGSP Key Species		ACI Key Species		ACP Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>No Use (0): The rangeland shows no evidence of use by grazing animals.</small>	0			..		0	0
<small>Light (1-25%): The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.</small>	10	2	60	8	80		
<small>Light (25-50%): The rangeland may be topped, stunted, or grazed in patches. The low value herbaceous plants are utilized and 60 to 80 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear crumpled or browsed in patches and 25 to 40 percent of the available leader growth of the key browse plants has been removed.</small>	30	5	150				
<small>Medium (50-75%): The rangeland appears actively covered to uniformly or partially browsed and desolates on all sides. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 41 to 60 percent of the available leader growth of key browse plants has been removed.</small>	50	1	50				
<small>Heavy (75-90%): The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Stems of thimbleweed grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are lodged and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on key browse plants. Approximately 61 to 80 percent of the available leader growth of the key browse plants has been removed.</small>	70						
<small>Very Heavy (90-100%): The rangeland has a worn appearance and there are indications of repeated overgrazing. There is no evidence of reproduction of current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 81-100% of available leader growth on the key browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Hedging is readily apparent, and the browse plants are more frequently broken.</small>	90						
TOTAL		12	260	10	80	10	0
Average Utilization = $\frac{\sum fx}{\sum f}$		22%		8%		0%	

REMARKS (Use back of sheet)

* Where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

NV 4400-12 (January 1953)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District <i>Wmca</i>	(2) Date <i>4-14-94</i>	(3) Observer <i>Scipione & Ron Hall</i>	
(4) Resource Area <i>P-D</i>	(5) Allotment <i>Bullhead</i>	(6) Operator/Allottee <i>NFC</i>	(7) Field Name or No. <i>First CK 301</i>
(8) Vegetation Type		(9) Range Site	
(11) Use Period <i>Horse Use</i>		(12) Grazing Management System	
(13) Transect Location/Key Area No. <i>301</i>			

(14) Use Rating of Current Year's Growth	Mid-Point (x)	AGSP Key Species		S144 Key Species		E1C1 Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
No Use (0%): The rangeland shows no evidence of use by grazing animals.							
Slight (1-20%): The rangeland has the appearance of very light grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.	10	10				20	
Light (21-40%): The rangeland may be topped, skinned, or grazed in patches. The low value herbaceous plants are ungrazed and 50 to 80 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear trampled or browsed in patches and 25 to 40 percent of the available leader growth of the key browse plants has been removed.	30	120	150	150		150	
Moderate (41-60%): The rangeland appears entirely covered as uniformly as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 41 to 60 percent of the available leader growth of key browse plants has been removed.	50	250	250	250		150	
Heavy (61-80%): The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Shoots of noncontaminated grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are heaped and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on key browse plants. Approximately 61 to 80 percent of the available leader growth of the key browse plants has been removed.	70						
Severe (81-100%): The rangeland has a worn appearance and there are indications of repeated coverage. There is no evidence of reproduction of current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 81-100% of available leader growth on the key browse plants has been removed. Some, and often much, of the 1st and 2nd year's growth of the browse plants has been utilized. Mounding is readily apparent, and the browse plants are more frequently broken.							
TOTAL		10	250	10	400	10	320
Average Utilization = $\frac{\sum fx}{\sum f} *$		$\frac{250}{10} = 25\%$		$\frac{400}{10} = 40\%$		$\frac{320}{10} = 32\%$	

REMARKS (Use back of sheet)

* Where f = the frequency or number of observations within each class interval (f column), x = the class interval midpoint (x column), and Σ = the summation symbol.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Range Utilization
Key Forage Plant Method

(1) District WMCA	(2) Date 8-2-95	(3) Observer SEIDLITZ
(4) Resource Area P-D	(5) Allotment Bullhead	(6) Operator/Allottee NFC
		(7) Field Name or No. FIRST CREEK 301
(8) Vegetation Type Spring/Early Summer	(9) Range Site	(10) Kind(s) & Class(s) of Grazing Animal(s) Cow/Calf Horses
(11) Use Period	(12) Grazing Management System	

(13) Transect Location/Key Area No.
301

(14) Use Rating of Current Year's Growth	Mid-Point (x)	A65P Key Species		5TTHZ Key Species		51H4 Key Species	
		Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)	Frequency (f)	(f) X (x)
<small>No Use (0%): The rangeland shows no evidence of use by grazing animals.</small>							
<small>Slight (1-20%): The rangeland has the appearance of very slight grazing. The key herbaceous forage plants may be topped or slightly used. Current seedstalks and young plants of key herbaceous species are little disturbed. The available leaders of key browse plants are little disturbed.</small>	10	1	50	0	40	1	60
<small>Light (21-40%): The rangeland may be topped, skinned, or grazed in patches. The low value herbaceous plants are ungrazed and 40 to 50 percent of the number of current seedstalks of key herbaceous plants remain intact. Most young plants of the key species are undamaged. Little or no use of low value plants. There is obvious evidence of leader use. The available leaders appear trampled or browsed in patches and 25 to 40 percent of the available leader growth of the key browse plants has been removed.</small>	30	2	120	2	150	2	120
<small>Medium (41-60%): The rangeland appears entirely covered as uniformly as natural features and facilities will allow. Fifteen to 25 percent of the number of current seedstalks of key herbaceous species remain intact. No more than 10 percent of the number of low value herbaceous forage plants are utilized. Browse plants appear rather uniformly utilized and 41 to 50 percent of the available leader growth of key browse plants has been removed.</small>	50	1	50	1	50		
<small>Heavy (61-80%): The rangeland has the appearance of complete search. Key herbaceous species are almost completely utilized with less than 10 percent of the current seedstalks remaining. Stems of dicotyledonous grasses are missing. More than 10 percent of the number of low value herbaceous forage plants have been utilized. The preferred browse plants are sought and some plant stems may be slightly broken. Nearly all available leaders are used and few terminal buds remain on key browse plants. Approximately 61 to 80 percent of the available leader growth of the key browse plants has been removed.</small>							
<small>Severe (81-100%): The rangeland has a worn appearance and there are indications of repeated coverage. There is no evidence of reproduction of current seedstalks of key herbaceous species. Key herbaceous forage species are completely utilized. The remaining stubble of preferred grasses are grazed to the soil surface. There is no evidence of terminal buds and 81-100% of available leader growth on the key browse plants has been removed. Some, and often much, of the 2nd and 3rd year's growth of the browse plants has been utilized. Mating is readily seaward, and the browse plants are more frequently broken.</small>							
TOTAL		10	270	10	240	10	19
Average Utilization = $\frac{\sum fx}{\sum f} *$		27%		24%		19%	

REMARKS (Use back of sheet)

* Where f = the frequency or number of observations within each class interval (f column),
x = the class interval midpoint (x column), and Σ = the summation symbol.

USE PATTERN MAP KEY 1994

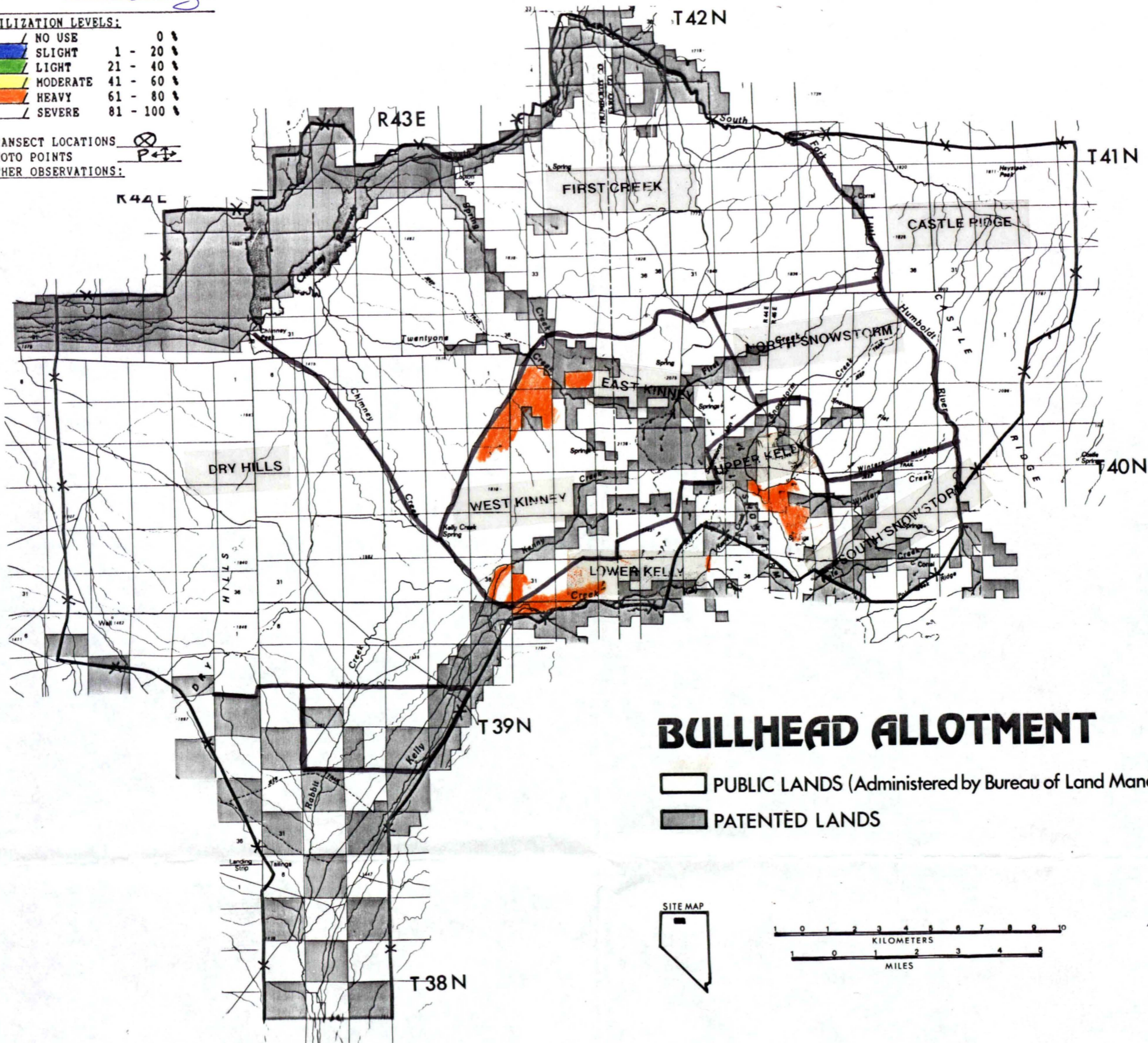
ALLOTMENT Bullhead
 PASTURE KINNEY, UPPER KELLY, LOWER KELLY
 DATE MAPPED OCTOBER 12, 13, 17, 18, 20
 ACTUAL USE _____

OBSERVER Mona Seeditz

UTILIZATION LEVELS:

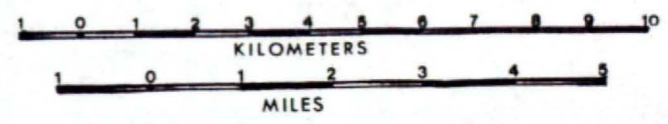
NO USE	0 %
SLIGHT	1 - 20 %
LIGHT	21 - 40 %
MODERATE	41 - 60 %
HEAVY	61 - 80 %
SEVERE	81 - 100 %

TRANSECT LOCATIONS ⊗
 PHOTO POINTS P4
 OTHER OBSERVATIONS: _____



BULLHEAD ALLOTMENT


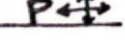
- PUBLIC LANDS (Administered by Bureau of Land Management)
- PATENTED LANDS

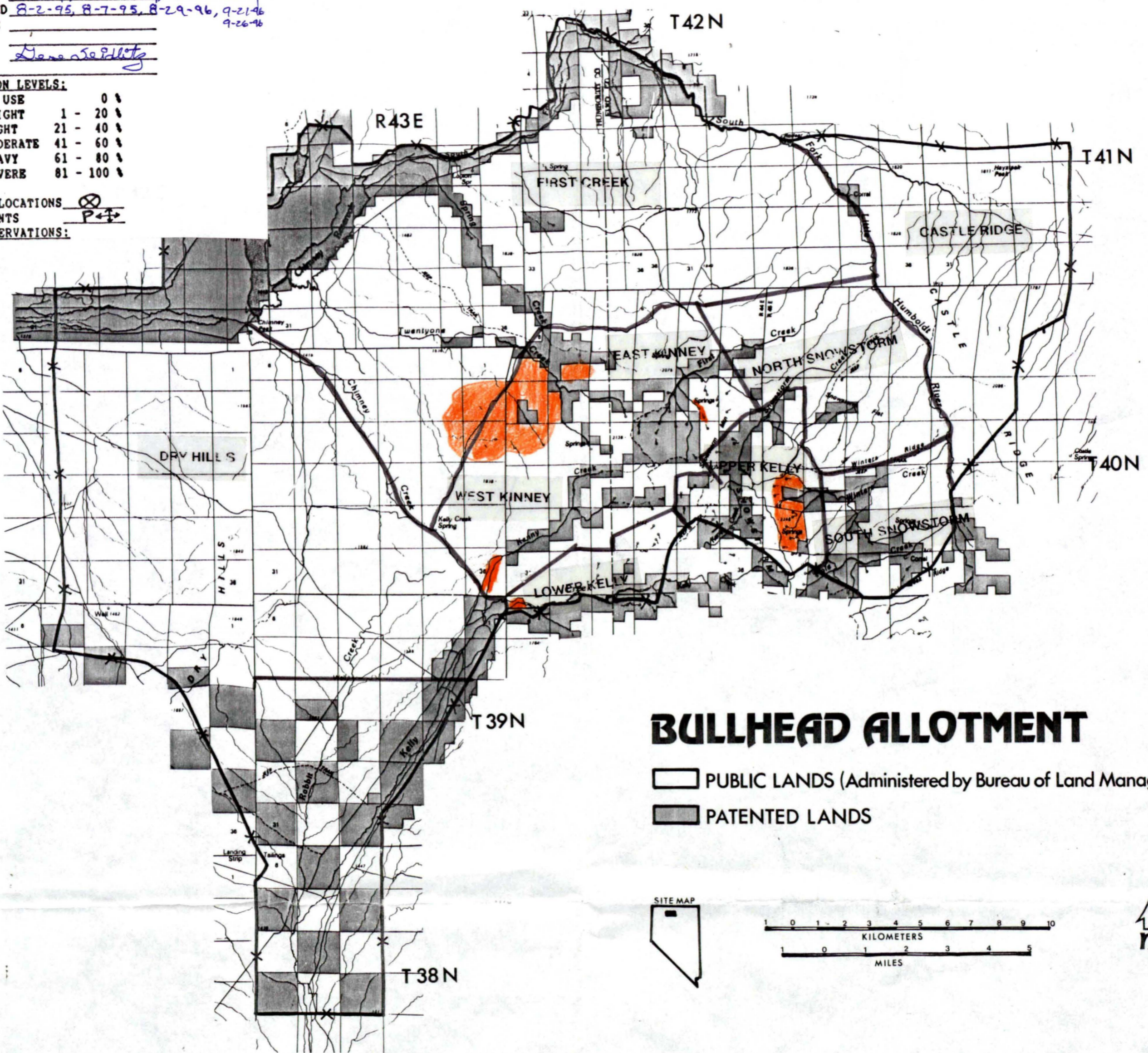


ALLOTMENT Bullhead
 PASTURE KINNEY, UPPER KELLY, LOWER KELLY
 DATE MAPPED 8-2-95, 8-7-95, 8-29-96, 9-21-96, 9-26-96
 ACTUAL USE _____
 OBSERVER Diana Seiditz



UTILIZATION LEVELS:

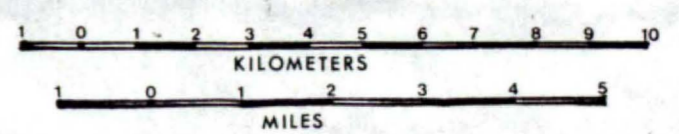
NO USE	0 %
SLIGHT	1 - 20 %
LIGHT	21 - 40 %
MODERATE	41 - 60 %
HEAVY	61 - 80 %
SEVERE	81 - 100 %

TRANSECT LOCATIONS 
 PHOTO POINTS 
 OTHER OBSERVATIONS: _____



BULLHEAD ALLOTMENT

-  PUBLIC LANDS (Administered by Bureau of Land Management)
-  PATENTED LANDS





COMMISSION FOR THE
PRESERVATION OF WILD HORSES

1105 Terminal Way

Suite 209

Reno, Nevada 89502

(702) 688-2626

April 16, 1997

Mr. Pete Christensen
Paradise-Denio Resource Area
Bureau of Land Management
5100 East Winnemucca Blvd.
Winnemucca, Nevada 89406

Subject: Bullhead Agreement - Snowstorm HMA

Dear Mr. Christensen:

Thank you for consulting the Commission for the Preservation of Wild Horses concerning the settlement of the Bullhead Final Multiple Use Decision Appeal with Nevada First Corporation. As an intervenor, we appreciate all the efforts by Nevada First and Winnemucca District to advise and seek our concurrence with these agreements.

Data collected from 1992 to 1995 provides additional insight and credibility to the Winnemucca District. Actual use and utilization data are essential in determining the carrying capacity. Specific utilization data collected on pastures used solely by wild horses will validate the appropriate management level for the Snowstorm Wild Horse Herd.

Data analysis determined the carrying capacity; however, the District did not allocate forage to livestock or wild horses. We would prefer that a reasonable utilization limit be placed for horses on key areas that will allocate forage. It would appear that wild horses are now utilizing "slight use" of key species during years rested by livestock. Therefore, it is reasonable that the existing numbers are at or below the appropriate management level.

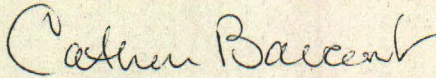
We encourage the District to establish a utilization level at approximately 20 percent for wild horses. In areas where wild horse numbers cannot be managed to a level to meet multiple use objectives, we support range improvement projects to mitigate wild horse impacts. Presently, horse use appears to be at the appropriate management level, additional forage should be awarded to livestock as a result of intensive management efforts.

Mr. Pete Christensen
April 16, 1997
Page 2

Pete, we wish to complement the District and Nevada First in reaching a meaningful agreement based upon your data. Wild horses have been a major issue for years in the Owhyee and Bullhead, we encourage the Elko District to adopt your approach and solutions. Efforts like yours keep issues in perspective and less subject to the historical arguments and politics.

P.S. Please note new address.

Sincerely,



CATHERINE BARCOMB
Executive Director

cc. Harvey Barnes, Nevada Cattlemen Association
Charle Amos
Gary Benochea, Nevada First



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

1105 Terminal Way
Suite 209

Reno, Nevada 89502
(702) 688-2626

September 3, 1996

Mr. Pete Christensen
Renewable Resources
Bureau of Land Management
5100 East Winnemucca Blvd.
Winnemucca, Nevada 89406

Subject: Bullhead Appeal - Settlement

Dear Mr. Christensen:

Thank you for meeting with us on August 25, 1996 to discuss the Bullhead Final Multiple Use Decision affecting livestock and wild horse interests. Though we do not have an appeal, our intervention status provides us an opportunity to assure our concerns are met in all future settlements or decisions.

We agree with Nevada First Corporation's request to use monitoring data collected since the FMUD to determine or verify the appropriate management level for wild horses. It is our understanding that use pattern mapping and utilization data collected on the First Creek Pasture provides an opportunity to adjust ungulate use.

We understand the available forage should be allocated to wild horses under the assumption that the land use plan proportions are valid and fair. We disagree. Land use plan proportions were just existing conditions to initiate monitoring for future adjustments. In the past, Winnemucca District used these proportions in manners that did not favor wild horses. It would appear that if the District continues this allocation process on the Bullhead Allotment, livestock would not receive full benefit from the intensive management provided by Mr. Amos and Nevada First.

Mr. Pete Christensen
September 3, 1996
Page 2

Specific to the carrying capacity and allocation of forage for the First Creek Pasture of the Bullhead Allotment, we have the following comments:

1. Use pattern mapping data collected in 1995 indicated severe use in the south west portion of the First Creek Pasture.
2. Utilization data collected in 1993 showed wild horse use of the First Creek Pasture measured only 22 percent with 2748 AUMs of actual use.
3. Key management area utilization data collected in 1995 contributes significantly to increasing the carrying capacity of the First Creek Pasture.
4. The Humboldt Fire does not significantly impact the wild horse use area within the herd management area.
5. There is a need to adjust the herd management area boundaries to resolve the private/public ownership in several pastures and to allow greater wild horse distribution in Dry Hills Pasture.

We propose the following stipulations for agreement or issues for a new final multiple use decision for the Bullhead Allotment;

1. Riparian utilization objectives must be met.
2. Wild horse utilization objectives of 25 percent must be set specific to dates prior to livestock.
3. Separate carrying capacity or appropriate management level computations will be made based upon new data collect in 1996, 1997 and 1998.
4. Land use plan amendments to adjust herd management areas will be completed by 1998.
5. The appropriate management level for the Snowstorm Wild Horse Herd will remain at the level established in the 1992 FMUD until the new allotment evaluation and decision is completed in 1998, or sooner.


Pete, we hope that our participation in the appeal processes has lead to a mutual agreement or consensus concerning how multiple use decisions should be executed. We have no problem managing the Snowstorm Wild Horse at the present appropriate management level.

Mr. Pete Christensen
September 3, 1996
Page 3

However, wild horse management requires sound rangeland monitoring data, wild horse actual use data and herd viability data to support all future decisions. We are encouraged with Nevada First Corporation's willingness to support a better process for forage allocation and the fact we must all abandon past agreements or arbitrary procedures that distort the facts collected by your professional range staff. It is our mutual hope that the Winnemucca District will be able to set new objectives and collect the necessary data to put to rest the continued debate concerning what ungulate used what forage.

We look forward to working with your people and embrace the progressive efforts of Nevada First Corporation.

Sincerely,



CATHERINE BARCOMB
Executive Director

cc. Nevada First Corporation

MEETING - AUGUST 21, 1996

BLM AND GARVEY RANCHES CONCERNING BULLHEAD ALLOTMENT

The purpose of the meeting was to progress in settling Garvey's Appeal against the 1994 FMUD for Bullhead. NDOW and NWC intervened with the BLM.

At this point, BLM used data collected from 1994 to present to determine carrying capacity for the allotment. New data suggest additional AUMs in the First Creek Pasture. The question is the allocation of the forage to users. Garvey contents that the CRMP agreement was for only 50 horses until Garvey was up to preference. Winnemucca District MFP III Decisions for proportional adjustments have been made on existing percentages at the time of the land use plan. This process would provide additional AUMs to the 170-190 horses on the allotment. The 1994 FMUD determined 140 head for the Snowstorm WHMA.

The Humboldt Fire was within the allotment, but does not affect wild horse numbers or forage. Horses will not be adjusted in the fire plan.

Horses are a problem with private lands within the HMA and use lands in Dry Pasture outside of the HMA. The District wants to amend the land use plan to address HMA adjustments.

Commission Position/Concerns/Actions

No data were presented to us to support the additional forage found in the latest data.

- We request use pattern mapping data and actual use.

Garvey and NWC agree that monitoring data and objectives should be specific to wild horses and livestock for allocation.

- We request that objectives and studies be established for the next FMUD.

Garvey and NWX agree that proportional adjustments based on percentages at the time of the land use plan are not appropriate. (Note: In this case the adjustments favored horses!)

- We request that new criteria, new objectives and monitoring will resolve this conflict in the future.

Practically speaking, the scheduled gathers this fall for Bullhead and Little Owhyee will get the Snowstorm to AML. Garvey thinks that the deal cut in CRMP is binding and that if they agree to allow 140 head of horses, then we should not have any problem with them getting all new AUMs to get to preference.

If we can be convinced that the AUMs are there, and BLM agrees to our stipulations for the next gather, we will gain a lot. Pete is sliding into other camps, I think we could get him committed here and force him to correct Sonoma-Gerlach.