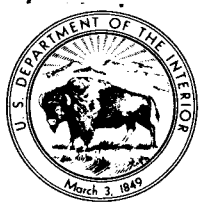


11-4-98



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
SURPRISE RESOURCE AREA
P.O. BOX 460

[Redacted]

IN REPLY REFER TO:

4120(CA-370) P

November 4, 1998

Cathy Barcomb
Commission for the Preservation of Wild Horses
123 West Nye Lane, Suite 248
Carson City, NV 89706-0818

Buckhorn

Dear Cathy:

It has been some time since I have had an opportunity to update you about where we are with the Tuledad Allotment planning process. As you are aware, the Surprise Field Office has been working to address long-term management of the [Redacted] since November, 1995.

During that time, we have worked closely with the affected interests, grazing permittees, and the public to identify the resource issues, define the desired vegetation and resource management objectives, and to develop an array of management options which will achieve the desired conditions. We have also worked closely together to define annual objectives for the management of this Allotment. Based on the input I have received over the past three years, I believe we are ready to document the environmental analysis and to issue a decision for long-term management of the Tuledad Allotment.

I hope to complete the Tuledad Environmental Assessment (EA) and issue the Decision Record in about mid-December 1998.

Enclosed is a summary about the vegetation management goals for the Tuledad Allotment, as well as the resource issues and management options we will be evaluating in the upcoming environmental assessment. Prior to completing the EA, I thought it might be helpful for you to review the information to see if you have any additional questions or concerns.

If you have any questions or additional concerns, please let me know by Friday, December 4. I would be happy to meet with you during the next month or so to discuss any questions or concerns you have.

Sincerely,

Susan T. Stokke
Surprise Resource Field Manager

Enclosure

TULEDAD ALLOTMENT PLANNING EFFORT

November, 1998

Background

The Tuledad Allotment is located about 25 miles south of Cedarville, California within portions of Lassen and Modoc Counties, California and Washoe County, Nevada. The Allotment is 160,400 acres in size, with about 89% federal and 11% unfenced private land. Development of a new grazing strategy and supporting projects is needed to resolve the following concerns:

- The 1991 allotment evaluation and subsequent annual evaluations highlight some resource management opportunities which will result in improved resource conditions over the long-term.
- Conflicts between livestock use and some special habitats such as aspen, bitterbrush, and riparian habitats are occurring from extended use periods, especially during the hot season (after July 15). In many cases, riparian recovery is being slowed due to this use.
- Some riparian areas have less vegetation diversity, and offer fewer resource values than those which could be provided. For the most part, riparian areas are functioning properly, but some are at-risk.
- There is disagreement about whether or not bitterbrush should be the management objective for some key areas on the Allotment, especially the Buckhorn. There is also disagreement about the factors contributing to its existing condition.
- Measured utilization levels are mostly in the light to moderate category; however, some areas with important resource values receive heavy use by grazing animals.
- Two livestock grazing permits have expired and require re-evaluation before they can be renewed.
- A determination as to whether or not the Allotment meets Rangeland Health Standards is required by the recently adopted range regulations.

Vegetation Management Goals

- Maintain or improve the diversity of vegetation types that occurs across the landscape.
- Create additional mosaic in the landscape by altering the age structure of the upland shrub communities.
- Manage for properly functioning condition, at or moving toward potential natural community, unless a desired plant community has been established.
- Ensure the long term health of rare but significant sites including, stream corridors, aspen stands, and Red Rock Marsh.

Resource Management Objectives

- Manage Duck Flat to establish Great Basin wildrye on loamy bottom sites.
- Increase the vigor of existing perennial grasses, especially in the high potential bottoms, using very site specific and low-risk practices. Maintain aggressive wildfire suppression to prevent large areas from burning.
- Treat mature stands of mountain big sagebrush to create mosaics, increase vegetation diversity, structure, and provide mixed age classes of brush.

- Conduct small scale bitterbrush experimental treatments to determine the best practices or combination of practices for successful bitterbrush re-generation in the Cottonwood Mountain, Buckhorn, and Coppersmith Hill areas.
- Reduce the density of juniper on sites that retain an understory of desirable grasses, forbs, and shrubs. Removal of juniper in and around riparian areas is a high priority.
- Manage aspen stands to prevent stand loss and to enhance stands where feasible.
- Increase woody vegetation or maintain upward trend on high priority streams and meadows.
- Move at-risk riparian areas into properly functioning condition as a minimum.
- Evaluate forage kochia (an introduced species) in low production, low rainfall sites which are presently cheatgrass monocultures.

Issues

Five resource issues have been identified and will be analyzed in the environmental assessment:

- * Impacts to Upland Vegetation Communities
- * Impacts on Wild Horses
- * Impacts on Riparian Vegetation Communities
- * Impacts on Wildlife Indicator Species
- * Potential Impacts on Livestock Management

Alternatives

Three alternatives are proposed for detailed consideration in the environmental assessment. They are:

- **No Action**

The No Action Alternative would accomplish the landscape goals and objectives over the long-term by minimizing impacts to existing livestock operations in the short-term. This Alternative would continue livestock grazing on the Tuledad Allotment as it has been managed for the last three years for an additional five years. An annual grazing meeting would be held prior to each grazing season to define specific management requirements and practices. Habitat improvements such as prescribed burning and vegetation treatment is planned; however, opportunities for burning would be limited to areas which can be dependably rested from grazing until recovery objectives are met. Fencing of some riparian, bitterbrush, and aspen communities and herding would be required to meet utilization standards. Also, adjustment would be made as needed to accommodate vegetation recovery on wildfires as needed. Any needed adjustments to meet resource objectives would be made annually.

- **Proposed Action**

The Proposed Action Alternative would balance the socio-economic needs of livestock operators for summer livestock forage with short-term accomplishment of the desired landscape goals and objectives. Summer livestock use would be

made in a series of new pastures and use areas that have few conflicts between livestock grazing and other uses during the summer and early fall. This Alternative would establish a Duck Flat Pasture for Great Basin wildrye re-establishment, a North Lake Field to assist in determining a desired plant community for lakebeds in the Allotment, and a Buckhorn Field to allow for experimenting with various techniques to re-establish bitterbrush. Adjustments would be made as needed in the grazing strategy in order to accomplish proposed projects and provide for appropriate post-treatment rest.

- **Early Use Grazing Alternative**

The Early Use Grazing Alternative would maximize opportunities for short-term accomplishment of landscape goals and objectives at the expense of existing livestock operators who would be denied use of available forage after July 15 annually for summer cattle grazing. This Alternative would emphasize aspen restoration in relatively large blocks in conjunction with adjacent big sagebrush sites; improving riparian vegetation for cold water fish streams as well as those streams with potential for woody vegetation establishment and would maintain high quality wetland and spring meadow habitat. Adjustments in the grazing strategy would be made as needed in order to accomplish proposed projects and provide for appropriate post-treatment rest.

10-9-97

SURPRISE RESOURCE AREA
Plan Conformance/NEPA Compliance Record

NEPA Control No.: CA-370-97-22
(CA-028-95-08)

Lease/Serial/Case File No.: 4700

Proposed Action Title/Type: *Coppersmith and Buckhorn HMA - Removal of Excess Wild Horses to AML*

Location of Proposed Action: *Tuledad Grazing Allotment*

Description of Proposed Action: *Proposed is removing about 50 excess wild horses from the Coppersmith HMA and about 60 wild horses from the Buckhorn HMA, on or after October 13, 1997, in order to maintain wild horse herds at the AML's established through monitoring, EA and Decision Record in November 1995.*

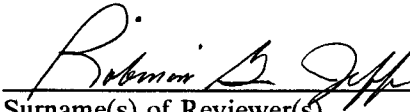
Applicant (if any): N/A

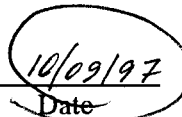
PART I: PLAN CONFORMANCE REVIEW

The Proposed Action is subject to the:

- Tuledad/Home Camp Mangement Framework Plan
- Cowhead/Massacre Mangement Framework Plan.

The Proposed Action has been reviewed for conformance with the checked plan (43 CFR 1610.5, BLM MS 1617.3).


 Surname(s) of Reviewer(s)


 Date

Remarks:

PART II NEPA REVIEW

- A. Categorical Exclusion Review. This proposed action qualifies as a categorical exclusion under || 516 DM 2, Appendix 1.[CX #]
 || 516 DM 6, Appendix 5.4.[CX #].
 It has been reviewed to determine if any of the exceptions described in 516 DM 2, Appendix 2, apply.

 Surname(s) of Reviewer(s) Date

Remarks:

- B. Existing EA/EIS Review. This proposed action is addressed in the following existing BLM EA/EIS:
- Environmental Assessment CA-028-95-08, dated November 11, 1995*
Decision Record dated November 13, 1995
Gathering Plan - FY 1996

The Proposed Action has been reviewed to determine if the previously prepared NEPA documentation fully covers the proposal.


Surname(s) of Reviewer(s) 10/29/97
Date

Remarks: The Surprise Resource Area began working to establish appropriate management levels for the Coppersmith and Buckhorn wild horse herds in 1994. A draft environmental assessment was issued September 12, 1994, summarizing monitoring data collected for the two HMA's. Public comments on the draft EA requested additional monitoring data. Therefore, the SRA chose to collect additional data during the 1995 field season prior to issuing a final decision. Based on the additional monitoring data, a final EA was issued November 11, 1995, and the Decision Record was signed on November 13, 1995, establishing an AML of 59-85 head for the Buckhorn and 50-75 head for the Coppersmith HMAs. No protests or appeals were received.

Late in November 1995, 246 excess wild horses were removed from the two HMA's. Subsequently, after the return of older animals, it is estimated 64 horses remained in the Buckhorn HMA and 72 horses remained in the Coppersmith HMA. This removal brought both herds to within the established AML range.

Aerial census conducted in September, 1997 showed that the populations have increased by 49% on the Buckhorn and 29% on the Coppersmith HMA, with numbers estimated at 125 and 101, respectively. Currently, about 110 wild horses are proposed for removal from the two HMA's. Following the removal, it is estimated that 116 horses will remain in the two HMA's which is within the range identified in the 1995 Decision Record.

The area has been monitored extensively in both 1996 and 1997. In 1996, utilization monitoring concluded that utilization criteria were met on all but one key riparian area, indicating that the AMLs established in late 1995 are appropriate and effective in achieving desired resource conditions. In 1997, use levels have increased noticeably over 1996, but utilization criteria have been met on all but 3 key riparian areas.

During this same period, livestock use in 1996 and 1997 was at 64% and an estimated 74% of total permitted use, respectively. In both years, about half of the permitted livestock have been removed from the allotment on July 15th and a rider has been employed to herd the remaining livestock out of key areas.


Key publics were notified of this proposed action on September 5, 1997. Two groups responded: Nevada Wild Horse Commission and WHOA!. Both asked if BLM had monitoring data to support the proposed removal.

Summary: Monitoring indicates that horse numbers have increased by 49% on the Buckhorn and 29% on the Coppersmiths since 1995. While utilization criteria are currently being met on most of the key riparian areas, utilization has increased noticeably over 1996 levels. During this same period, livestock use has been about 30% below permitted and have been managed in a manner to minimize impacts to key riparian areas. With the wild horse population increases demonstrated in the past two years, it is anticipated that utilization of key riparian areas will increase substantially. Removal of the excess horses to established AMLs is proposed to prevent over-utilization of key riparian areas and resource damage from occurring, as well as to maintain the range in a thriving natural ecological balance. This proposal does not require a new NEPA decision since current monitoring data show the established AMLs are valid and the capture methods will remain the same.

PART III DECISION

I have reviewed this plan conformance and NEPA compliance record and have determined that the proposed project is in conformance with the approved land use plan, that existing NEPA documentation previously prepared by the BLM fully covers the proposal, and that no further environmental analysis is required. It is my decision to implement the project, as described, with the stipulations/mitigation measures identified below.

Stipulations/ Mitigation Measures: Monitoring data will continue to be collected on the wild horse populations and vegetative resources in the two HMAs to determine if established appropriate management levels remain valid.


Environmental Coordinator:

10/09/97
Date:


Authorized Official:

10/9/97
Date: