

10-30-92

IN REPLY REFER TO:



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
SUSANVILLE DISTRICT OFFICE
705 Hall Street
Susanville, California 96130

1730-IVMP
CA-020

OCT 30 1992

Dear Reader:

I need to update you on the issue of our management of the East Lassen Deer Herd area and invite you to attend one of our public workshops scheduled for mid-November. Summer is ending and we have been spending many hours in the field implementing our grazing decisions of last spring. We have been attempting to keep you informed of our activities through the "East Lassen Update" which was sent out on June 19 and August 28, 1992. Additionally, various other mailings specific to an individual allotment have been mailed to many of you to keep you informed or request your input.

During the summer we have been continuing to develop and implement our course of action in the East Lassen area. As you are aware, we issued Grazing Decisions for the Twin Peaks and Tuledad allotments on March 6 and April 15, 1992, respectively. These decisions are under appeal by the Nevada Department of Wildlife, California Department of Fish and Game, Natural Resources Defense Council, Mountain Lion Foundation, National Audubon Society, California Mule Deer Association, Sierra Club, and the California Native Plant Society and are currently before the Department of Interior's Office of Hearings and Appeals.

Compounding this situation, we are officially entering our seventh year of drought. I personally have made various trips with staff into the area and first hand have observed the dry conditions. I spent a day with my District Advisory Council in the Observation and Twin Peaks allotments and gathered their advice on the issue. They are a council which represent multiple interests from agriculture to wildlife and general environmental organizations to mining. They provided fresh insight on the issue.

So, what actions were taken to ameliorate the situation this summer after the grazing season was underway? I set up a project team that will plan for the overall guidance of the area as it relates to the land use plans and pave the way for the development of integrated activity plans that will be started this fiscal year. I named John Bosworth, the Assistant District Manager for Administration, to be the project manager. He has established a team made up of resource specialists from both the District and Resource Area staffs to develop umbrella guidance that addresses the issue of the ungulate use of vegetation. This guidance will clarify the direction in the land use plans for their applicability on specific geographic areas and then prioritize the areas for

integrated activity plan development and implementation. I expect this guidance to be finished in early spring and for us to be well on the way of integrated activity plan development next summer. These integrated activity plans will set the specific implementation direction for all the land use objectives pertinent to these areas. Integrated activity plans are not a new concept and are along the lines of one of our real successes in the Cedar Creek Area of the Alturas Resource Area.

The umbrella guidance will serve the purpose of clarifying the land use plan decisions and setting priorities of the resources that the land use plan was not clear in setting. It will state the goals and the desired landscape for a geographic area and the priority that I am placing on the area to achieve this desired landscape. This is needed to allow us to place our limited funds and manpower in the areas of greatest need first and schedule the areas of lesser priority second.

In addition to the effort John is heading, I was also concerned about the affects the drought was having on the Grazing Decisions we implemented in the Twin Peaks and Tuledad allotments last Spring and how we were doing in implementing those decisions. So, in July of 1992, I requested an internal review of the implementation of the decisions of the Twin Peaks and Tuledad allotments that were issued on March 6 and April 15, 1992. The review was conducted by the California State Office Range Conservationist and Wildlife Biologist on July 21 and 22, 1992. The purpose was to conduct a review of compliance to date with the conditions outlined in the Grazing Decisions. I also asked them to comment on the affect that the drought was having on the ability to implement these conditions. This evaluation was conducted in coordination with the Eagle Lake and Surprise Resource Areas. I am enclosing the results of their report along with the actions that we are taking on the recommendations.

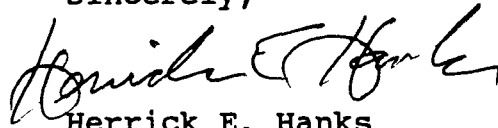
During this fall, we are also examining whether or not, and under what criteria, the District will be open for livestock grazing next year (1993). I have directed the Associate District Manager, Bob Sherve, to put together an interdisciplinary team to look at this issue and establish the criteria. We expect to present a draft preliminary conclusion and criteria to the District Grazing Advisory Board for their review in November. I am concerned that for any grazing to occur next year, the drought cycle must be broken. Because of lack of water this year, we curtailed cattle grazing in the Twin Peaks allotment by October 15, 1992, two and one half months before the end of the normal grazing season.

I hope we are keeping you well enough informed on this issue. We will continue to send out the "East Lassen Update" and various other relevant information. We will also have two public workshops on the topic. The first will be in Sacramento on Monday, November 16, 1992 at 7:00 p.m. at the Radisson Hotel, 500 Leisure Lane, in Conference Suite 303, just off of Hwy 160. The second will be in Susanville on Tuesday, November 17, 1992 at 7:00 p.m. in the

Multipurpose Room of Lassen High School, Main Street, Susanville.
The purpose of these meetings will be to explain how we are addressing this issue and to solicit any input that you may have. Additionally, we will have draft products available of our resource data base for you to review, and those who are familiar to the area, to validate.

I hope this letter helps inform you of what is happening on this complex issue. If you care to send me any comments, please address them to East Lassen Issue, USDI-Bureau of Land Management, 705 Hall Street, Susanville, CA 96130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Herrick E. Hanks".

Herrick E. Hanks
District Manager

INTERNAL REVIEW OF TWIN PEAKS AND TULEDAD ALLOTMENTS
1992 GRAZING IMPLEMENTATION
AND
DROUGHT CONDITIONS
July 21 & 22, 1992

TWIN PEAKS ALLOTMENT

1. Evaluation of Compliance with Grazing Decisions

Item II.C.1.

Condition: North Pasture: In even numbered years up to 225 Espil cattle will be authorized from 4/15 to 12/31 provided that the total number of Espil cattle in the allotment does not exceed the numbers provided for in the basic operation and flexibility sections of the AMP.

Findings: Operator reported turn out of approximately 225 cattle. BLM did not verify numbers prior to or on 7/1. Flight occurred 7/15(?), indicated approximately 250 cattle.

Recommend: In future, verification of numbers should occur by 7/1. Also, the allowable grazing use statement needs clarification as to maximum livestock numbers at any given time.

Action: Actual verification occurred on July 9, during an overflight of the allotment. We do not disagree with recommendation, however, the grazing agreement calls for numbers to be reported by the permittee. Due to the fact that numbers were verified within a short time after July 1, and appeared to be within limits, there was no reason to doubt that the permittee had turned out numbers of livestock as he reported.

Item II.C.2.

Condition: Roland Mountain Subunit: In even numbered years any cattle using the Roland Mountain subunit will be placed east of Roland Mountain, including the Hole-in-the-Ground with minimal use of the Norton Place.

Findings: Condition complied with. Verified with overflight.

Recommend: n/a

Item II.C.3.

Condition: Lower Smoke Creek Subunit: Up to 200 cattle will be authorized to use this area from 3/1 to 4/30, annually, subject to terms and conditions within this addendum. Since the grazing capacity for this area with this system is unknown, it may be necessary to move livestock before 4/30.

Findings: Livestock removed by 4/30. However, there were four known instances of livestock drift into the area after 4/30. Permittee responded within 1 day in three instances; however, in the fourth instance, 60+ cattle were not removed for six days.

Recommend: The location of the utilization cage should be chosen through an integrated approach in coordination with all affected interests (if location chosen is other than that recommended by Allotment Management Plan Review Committee (AMPRC) established in 198-. Use level determinations should be made frequently during the grazing period. Prior to May 1, 1993, either 1) a drift fence to prevent livestock movement downstream into Smoke Creek from Bull Flat should be installed, or 2) no grazing should be authorized in Bull Flat after 4/30/93.

Action: Location of utilization cages will be done in coordination with affected interests. Current location is in accordance with the AMP RC recommendations.

A fence to prevent livestock drift from Bull Flat into Lower Smoke Creek is already in progress (EA and IMP Notice being prepared). Cattle were removed after each incident within a reasonable time frame and eventually a number of cattle were totally removed from the allotment to prevent further drift.

Item II.D.1.

Condition: Sheep use in Roland Mountain will be restricted after 7/15 to a total of 10 days trailing through the subunit.

Finding: Trailing has not yet occurred.

Recommend: n/a

Item II.D.2.

Condition: Except for trailing along the Smoke Creek Road, no use shall be made in the Smoke Creek Subunit after 4/30. Maximum allowable use levels on the Lower Smoke Creek riparian area is 40% of total current year's production.

Findings: Livestock were removed by 4/30; however, drift problems occurred (see II.C.3). Use level monitoring was not conducted at the end of the grazing use period, therefore we do not know if the 40% maximum use level was exceeded. Utilization cage was placed at the key area approximately 2 weeks ago.

Recommend: The "Considerations" discussion uses the terms "diligent effort" and "promptly responsive". These terms should be removed. Use levels need to be determined frequently during the grazing use period.

Action: Clarification of what "diligent effort" and Promptly responsible" will be attempted with the permittee prior to next grazing season. These terms were used at the request of the permittee for the grazing agreement signed 3/5/92.

Item II.D.3.

Condition: After 4/30, should estimated utilization of riparian-associated plants in the publicly owned portions of the North Fork of Buffalo Creek drainage and Parsnip Creek drainage be determined to be approaching or have reached 40% utilization, the permittees will be notified by the BLM and the livestock will be driven from these drainages by the permittees. The permittees will make diligent efforts to keep livestock out of these drainages for the remainder of the year.

Findings: North Fork Buffalo Creek: No use level measurements made to date. Report of some livestock use made (24 head reported). Livestock were removed from the area in anticipation of meeting or exceeding use levels. Livestock may reenter/drift into the area in the future.

Parsnip: Utilization levels determined recently. Upland was 60+% use at the higher end, but was estimated as "light" in the lower end. Livestock were subsequently removed from the drainage and to date no reentry has occurred. Utilization cage established after use was made.

Recommend: North Fork Buffalo Creek: An additional key area and riparian monitoring station should be established. This should be in coordination with all affected interests (if different from the site chosen by the AMPRC). Use levels need to be determined frequently during the grazing period.

Parsnip: Riparian key areas should be established at the high and low ends of Parsnip Creek. Use levels need to be determined frequently during the grazing period.

Action: Key areas are still being finalized based on consultation and review of AMP RC recommendations. This is on-going.

Item II.D.4.

Condition: If forage utilization levels of current year's growth of key species on key livestock use areas are approaching or have reached 60%, livestock will be moved to less utilized areas. Existing key areas will be evaluated and new key areas will be determined by using use pattern maps as a guide.

Findings: To date approximately half of the key areas have had mid-season readings; staff plans to complete the remainder within a week. One key area exceeded 60% utilization; operator was told to remove livestock; compliance has not yet been checked by BLM. To date use pattern mapping indicates that other areas outside key areas have exceeded 60% utilization. Use level information collected was not made available for team review. In addition, only two new upland key areas have been established; these were chosen by BLM and the permittee. It should be noted that to date no key areas have been established in riparian habitat.

Recommend: Additional key areas should be established before the beginning of the next grazing season. These should be determined in coordination with all affected interests (if sites chosen are other than those of the AMPRC). Continue to evaluate the utility of existing key areas and the need for additional key area locations based on future use pattern mapping in future grazing seasons. Key areas should include important wildlife habitat in which livestock may have an influence.

Action: Refer to II D 3: Wildlife habitat monitoring and establishment of key areas is being done as outlined in the **Monitoring Action Plan for Twin Peaks Allotment (Updated 6/92)**. Additional key areas are being evaluated and will be determined in coordination with all affected interests. Most sites are those identified by the AMPRC. Sites will be established prior to next grazing season.

Item II.D.5.

Condition: Sheep camps and bedding grounds shall not be located on known active sage grouse strutting grounds. Sage grouse strutting grounds locations will be disclosed to the permittee through consultation with BLM.

Findings: Staff believes compliance was achieved; need to consolidate and document any actual monitoring carried out and the results. Unknown if maps were supplied to permittee.

Recommend: Insure that sheep herders are informed of locations of active sage grouse strutting grounds in advance of their entering the allotment. Compliance must be monitored and documented.

Action: Permittees were informed of locations of strutting grounds and provided with maps prior to grazing use. Strutting grounds were avoided and documentation is being provided.

Item II.D.6.

Condition: Sheep will not be driven into or bedded or shaded in aspen stands.

Finding: Three of six stands monitored received bedding or feeding use by sheep. To date BLM is working on inventorying aspen stands; no fencing has occurred.

Recommend: Insure that sheep herders are informed of this requirement. Monitoring of compliance must continue. Re fencing, based on the current aspen inventory, fencing where needed to protect aspen stands must be implemented prior to the next grazing season.

Action: Again, permittees were aware of this requirement prior to entering the allotment. Monitoring of aspen stands is on-going. This year, initially, was used to map and classify existing aspen stands and establish a baseline. Fencing will be evaluated based on classification of stands and identified need.

Item III.2.

Condition: In addition to prescribed AMPRC monitoring, BLM will undertake monitoring of utilization of perennial grasses, key wildlife shrubs, woody riparian species and aspen at the time of livestock removal, again at the end of the growing season, and again at the normal time of out-migration of the East Lassen deer herd in early spring. This may include establishment of exclosures designed to differentiate livestock utilization from other animals. Also, monitoring may include other studies and methods depending upon the information desired. Determination of sites will be done in consultation with permittees and affected interests wishing to participate.

Finding: Materials for three-way exclosure obtained, site located; plan to install by 9/30 as prescribed in Monitoring Plan.

Recommend: Location of three-way exclosure must be coordinated with all affected interests.

- Action:** Three (3)-way enclosure will be coordinated with affected interests. Consultation with NDOW and CDFG has already occurred.
- Condition:** BLM will monitor and record grazing utilization on key areas by the Key range Plant method, as supplemented by clipping and weighing and/or stubble height measurements while livestock are still within a subunit or pasture, to alert BLM to use levels occurring and promote adherence to objective use levels.
- Finding:** Mid-season utilization completed for Twin Peaks. See II.D.4. for results.
- Recommend:** n/a
- Condition:** The permittee in coordination with BLM will make diligent efforts to record their estimated numbers of livestock and dates of use on a subunit(s) basis. Permittees are also encouraged to record and submit this information as the season progresses following the end of substantial use within a subunit and supplement it with maps. The end of substantial use for cattle means when all but stragglers and strays have been pushed on to a use a new area; for sheep it means when the sheep have been moved out of the subunit or allotment.
- Findings:** To date no recorded information or maps have been submitted to BLM. Casual spot checks by BLM have occurred.
- Recommend:** Provide permittees with adequate maps showing subunits upon which to supply information. The condition should be revised to make the supplying of a map and recorded information a requirement before the next grazing season.
- Action:** Permittees have now been provided with allotment maps. They will provide accurate counts of livestock on the allotment. This will be followed up beginning of next grazing year with additional maps when turn-out occurs.

Item III.3.

Condition: For annual adjustments in livestock use by subunit or pasture basis, the formula listed below may be employed by BLM and considered with other monitoring information. Use of this formula is predicated upon reasonable estimates of AUM removal by livestock by subunit(s).

The desired stocking rate formula is used with precipitation data to determine stocking rate adjustments:

$$\frac{\text{Actual AUMs Grazed}}{\text{Determined Utilization \%}} = \frac{\text{Desired AUM Stocking}}{\text{Objective Utilization \%}}$$

Findings: As in III.2., information to determine actual use by subunits or pastures has not been provided to BLM; therefore, annual adjustments per the formula cannot be made. There is no way to correlate use level determinations with actual use information by key area or subunit.

Recommend: From the wording in the Decision, this appears to be optional. BLM should commit to this. It should be mandatory that permittees provide the information, or their leases be suspended (or other appropriate incentive). BLM should also do spot checks.

Action: We feel that by using the use pattern mapping and utilization completed this season in concert with actual use reports submitted by the permittee, a suitable determination can be made on sub-unit basis. However, it should be noted that the sub-units used by the AMP RC and the Technical Review Team (TRT) formed in June, 1987 are not pastures in the allotment, nor easily locatable geographic boundaries.

2. Other State Office Recommendations and District Responses

- a. Recommendation: Differences between the subject Grazing Decision and the Decision Record of 3/6/92 need to be resolved where there are differences in commitments.

Response: This questions is an appeal point by several appellants to the grazing decision. While not materially different in most cases, we would agree that the "differences" should be clarified.

- b. Recommendation: The Pilgrim Lake enclosure is subject to livestock entry. The fence line should be repaired and any other necessary measures taken to maintain the effectiveness of the enclosure before the beginning of the next grazing season.

Response: The Pilgrim Lake Exclosure problem has been noted. A new design for a portion of the fence at the dam is being prepared. Given adequate funding at Annual Work Plan (AWP), the exclosure will be changed to correct defaults.

- c. Recommendation: Livestock use periods should be based on predicted use levels rather than fixed calendar dates. A concerted effort should be made to monitor use levels frequently to achieve this.

Response: Utilization monitoring will continue on the allotment throughout the time needed to complete the East Lassen Integrated Vegetation Management Plan (IVMP). It is anticipated that through this planning effort, adjustments in stocking rates and periods of use may occur. If not through the IVMP, then during the AMP evaluation process that would follow.

TULEDAD ALLOTMENT

1. Evaluation of Compliance with Grazing Decisions

1.a. Condition: 50 cattle in Bald Mt. Use Area 4/15-7/15; these will be removed from allotment in July.

Finding: Grazed 5/1-6/15, then removed.

Recommend: n/a

b. Condition: Cattle use in South Pasture 4/15-7/15; no cattle after 7/15.

Finding: Near compliance. 25 head reported to remain in the area.

Recommend: n/a

c. Condition: Cattle use in Buckhorn Use Area 5/1-7/15.

Finding: Near compliance. A few head left in (less than 2%).

Recommend: n/a

d. Condition: North Pasture cattle use 7/15-9/30. No livestock to be in Bud Brown/Wire Lakes area. Herder to be used to keep livestock out of designated key bitterbrush areas.

Finding: Livestock moved into area recently. Use levels predicted to be exceeded, especially on riparian area, especially if livestock are left in until 9/30.

Recommend: Closely monitor the area in order to prevent prescribed use levels from being exceeded by timely removal of livestock.

Action: Planned fall cattle use was reviewed. Cattle have been turned into the North Pasture outside of the key bitterbrush area in the Bud Brown/Wire Lakes portion of the pasture. Cattle are beginning to drift into the Bare Ranch north of Ant Spring. The Tuledad Grazing Association herder has been successful in keeping cattle out of the Bud Brown/Wire Lakes area and is bringing cattle into the ranch as they reach Ant Spring. Gary Nolan of Simplot, a permittee, believes that most of the cattle will be off of the allotment by the end of August. The Tuledad Grazing Association agreed to remove the remaining cattle from the allotment the first week in September. The riparian areas are being monitored for stubble height and will continue to be monitored through the fall.

e. Condition: Sheep use.

Finding: Information on spring use (locations, level of use on bitterbrush, duration of use, etc.) not available.

Recommend: Need additional BLM oversight to prescribe and monitor sheep movements, routes, and grazing influences.

Action: General information on spring use, including locations and durations of use, exists in the resource area. Use in bitterbrush areas is also known; however use on bitterbrush will not be known until the three-way exclosures have been installed and read. In addition to this general information, Wes Cook, a permittee, will complete actual use forms and maps with more specific information on locations and durations of sheep use.

Fall sheep use was discussed at the meeting. Wes's sheep will re-enter the allotment around September 20 in the Cottonwood Mountain area. His bands in the fall are dry ewes which do not require the high nutrition forage that are needed by ewe/lamb bunches; therefore, he has more flexibility in using dry forage and will be able to stay out of key bitterbrush areas. If there are no storms in August or September to fill low elevation reservoirs, he will use the north side of Cottonwood Mountain around Bryant and Gerlach Springs, then move to Express Canyon, Willow and Garden Lakes, Worland Spring, and Chalk Hill Spring. All of these areas are outside of the key bitterbrush areas. Due to the dry winter and hot spring, little cattle use was made of the forage in many of the lower elevation areas of the South Pasture; therefore, ample forage exists in these areas for sheep this fall. If the low elevation reservoirs fill, the sheep will be kept at lower elevations. The sheep should be leaving the allotment October 15. Wes is actively looking for fall pasture to which he could trail his sheep quickly. Should he find pasture, he could trail his sheep through Tuledad in less than one week.

Fall sheep use will be closely monitored by resource area personnel to prevent use in key bitterbrush areas and overuse of aspen and riparian areas.

Finding: Fall use yet to occur. Concern in RA that there will be ample forage; looking at prescribing quick trailing through.

Recommend: Implement.

2.a. Condition: Annual use mapping for 4/15-7/15 to be completed mid-summer.
Utilization transects for 4/15-7/15 to be completed mid-summer.

Finding: In process. Data not available to review.

Recommend: n/a

Action: Utilization transects on the south half of the allotment have been read. Transects on the north half will be completed in October.

b. Condition: Annual bitterbrush transects to be done in spring and fall.

Finding: Transects read in spring.

Recommend: Transects being read differently in each Resource Area (re consideration of growth whether available or not). A determination should be made on which way to read transects, and both RAs should implement. Also, several small exclosure cages should be placed in representative situations to provide information on annual growth. This would be used to help determine utilization. Plant phenology should also be monitored and considered for use as grazing threshold in lieu of fixed dates.

Action: The RA biologist will consult with the other resource area to resolve differences in bitterbrush transect data collection. Small exclosure cages exist within all three key bitterbrush areas. They show annual growth; however, they are permanent exclosures and cannot be relocated annually. Additional, re-locatable exclosures will be placed near transects. Plant phenology has been monitored in the resource area. The main north/south pasture move of July 15 is based on the average date when bitterbrush (in the red juice stage) becomes more palatable to livestock than grass species which are curing. The date varies somewhat from year to year; however, the variance is not great and a fixed date is a practical way to allow the operators to plan in advance for major pasture moves.

c. Condition: Riparian complexes to be monitored for utilization between July-September.

Findings: The following riparian complexes were visited:

Ant Spring: At threshold now due to horse use. Livestock have not been in this area yet. Livestock thought likely to move to Bare Ranch if they get here.

Pryor Spring: In good shape now. Horse use, but no livestock to date.

Cedar Canyon/Chalk Hill: Cedar Canyon exceeded threshold. Cattle gone. Willows recruiting. Chalk Hill OK; much use but still 2" stubble height. Adjacent areas denuded. Cattle mostly gone.

Bryant Spring: Cattle to be left until 8/1. Use levels appear to be exceeded.

Recommend: All riparian areas should be monitored frequently and adjustments made to prevent exceeding use levels.

Action: Methods for protecting Ant, Mattress, and Pryor Springs riparian complexes were considered. These three areas receive a great deal of wild horse use and are generally fully used before livestock enter the North Pasture in the summer. The Tulead Grazing Association would like to use Fee Credit, Grazing Advisory Board, and contributed funds, preferably beginning next year, to develop Pryor Spring and to fence Mattress, Pryor and Ant Springs. Survey and design will be performed on these three springs this fall and construction will be completed according to the availability of funds, beginning in FY 93. As presumed, livestock have been continuing north into the Bare Ranch as they reach Ant Spring.

Cedar Canyon contained very little flowing water this spring, thus limiting the amount of growth in the riparian corridor. In June, the canyon was heavily washed, resulting in very little growth being left prior to the tour. Cattle spent very little time in either the Cedar Canyon or Chalk Hill Spring area; however, sheep entered the allotment this spring in Cedar Canyon and made considerable use in the riparian areas.

It was agreed that Bryant Spring was not functioning properly. The spring source is owned by John Casey and was developed at a time when Casey had grazing preference in the area. The second trough is not getting any water due to a repeatedly clogged overflow. There are presently no plans to fence or to reconstruct the spring.

Riparian study plots in the identified key riparian areas are being established this summer and will be monitored for utilization through the remainder of the season. The herder on the allotment has been very cooperative in moving cattle out of areas when they become more heavily used.

d. **Condition:** Three-way exclosures will be set up in Buckhorn Area.

Findings: One exclosure installed. Welded wire was used instead of woven wire; not suitable, so materials will be traded before second exclosure is installed. Location for second exclosure flagged. Locations chosen

without participation of interested parties. RA will attempt to install third enclosure as well.

Recommend: NDOW did not feel the second location was representative. Since the enclosure will provide information upon which deer population management decisions will be made, it is important to coordinate its location with the game agencies, as well as other affected interests. Also, all affected interests should be afforded the opportunity to participate in reading three-way and browse transects.

Action: The RA wildlife biologist is consulting with NDOW and CDF&G about locations for the second and third enclosures. The material for the second enclosure has been purchased; the material for the third enclosure will be purchased as funds become available. Methods of involving affected interests in the reading of browse transects and three-way enclosure studies are being investigated.

e. Condition: Permittees will submit actual use reports at the end of each season showing dates and livestock numbers for each use area.

Finding: To be submitted.

Recommend: n/a

Action: Operators were reminded of the need to submit actual use reports.

2. General State Office Recommendations and District Responses:

a. Recommendation: The 2" stubble height may not be an appropriate utilization threshold. Much depends on when use occurs. Early in the season allows regrowth, while later may not. 2" height may not be adequate for some values.

Response: Studies are being performed on riparian areas at this time. The adequacy of these studies in meeting riparian values will be reviewed this fall. The 2" stubble height requirement was recommended for use by the Tuledad Objectives Setting Committee of June 26, 1990. Should the 2" stubble height requirement be inadequate to meet the needs of riparian values, adjustments will be made and incorporated into the Integrated Vegetation Management Plan on a site-specific basis.

b. Recommendation: Livestock use periods should be based on predicted use levels rather than fixed calendar dates. A concerted effort should be made to monitor use levels frequently to achieve this.

Response: Livestock use periods on the allotment are based on predicted use levels and phenology. The July 15 pasture move date is based on 12 years of data on bitterbrush use, phenology and palatability. Movements across use areas within each pasture, both

before and after the July 15 break, are based on use levels as determined by the BLM in conjunction with the operators. A full-time herder is present on the allotment to move cattle into or out of areas as he is requested by either the BLM or the livestock operators. In the future, a more concerted effort on the part of the BLM will be made to monitor use levels more frequently.

- c. Recommendation: Inventory aspen groves and determine which need protection. Provide budget needs to CSO. Implement protective measures where needed.

Response: An Ecological Site Inventory (ESI) is presently being conducted on the South Pasture of the allotment. This inventory will include aspen groves and should help determine needs for protection. In the summer of 1993, the ESI will be conducted in the North Pasture. Upon completion of the inventory, aspen protection needs will be prioritized and budget requirements to provide this protection will be supplied to the CSO.

- d. Recommendation: Re Bud Brown - CSO will examine ability to fund fence project.

Response: Bud Brown riparian area is scheduled to be fenced in fiscal year 1993, should funds be available. No cattle use will occur in the area this year; however, several bunches of wild horses in the Coppersmith Herd use the area year-round. The meadow areas are heavily trampled, juniper and sagebrush are invading, and stream courses below the springs are down-cutting. Due to the large amounts of water and deep soils, the complex has the potential to be an excellent riparian area. Water outside the area is plentiful and should not be a limiting factor.

- e. Recommendation: Gerlach Spring - need to pursue an easement to develop and protect spring source and riparian area.

Response: Gerlach Spring and riparian area are owned by Simplot. Wes Cook and Wayne Dollarhide, both permittees, agreed that the spring is not providing a good supply of water and that the meadow area is in poor condition; however, Gary Nolan of Simplot's Bare Ranch was not present at the meeting. We will pursue an easement to fence the meadow and to pipe some of the water to a trough outside the riparian area.

**SHOULD CLOSURES OF RANGELAND BE MADE IN THE EAST LASSEN
AREA DUE TO DROUGHT CONDITIONS?**

Based on climatic data, vegetation and water conditions, and the responses of many permittees in the area (eg, with the application of voluntary non-use requests for grazing this season), consideration of formally closing the ranges as provided for in 43 CFR 4110.3-3(c) and 4110.3-2(a) would be most appropriate.

The Area Managers of the Eagle Lake and Surprise Resource Areas, however, do not think formal closure is appropriate for the following reasons:

1. Some of the drought-stricken rangelands in the East Lassen area as well as elsewhere have not been grazed this season nor are they currently being grazed. Many of the permittees have requested non-use based on the predicted lack of sufficient livestock water. Others have requested non-use based on financial or other factors not related to the drought.
2. To date any livestock removed from allotments due to drought conditions, as requested by the Area Managers, have been removed voluntarily. The managers do not see the need for formal decisions.
3. The management prescriptions established for some allotments (for instance, the Twin Peaks and Tuledad allotments; see above reports) should compensate for most adverse effects of the drought, if applied timely and appropriately.

Although we do not fully agree with this rationale, formal closures at this time are not supported by the managers and in most cases would not be timely. Closures in many areas should have been made before grazing turn-out or at least by mid-June to minimize most adverse effects of the drought. The managers now should strongly consider and identify the criteria for continuing grazing or entertaining new grazing requests as drought conditions remain, and determine what vegetative and watering condition recovery levels need to occur prior to authorizing any further grazing should drought conditions subside (including next season).

If favorable climatic conditions do not occur prior to turn-out next grazing season, it is strongly recommended that formal rangeland closures be issued, at least for lower elevation rangelands, identifying the soil-moisture and vegetative response conditions that must be met prior to authorizing grazing. Any actions or criteria established should be consistently applied to all areas undergoing the same influences of drought, regardless of where the particular allotment is or what the individual permittee's particular operational needs are. Protection of the rangeland resource and fair implementation of management is of paramount importance. BLM Manual Handbook H-4110 and IM CA-91-162 provide guidance for appropriateness and procedures involving range closures.