



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
~~BURNING RESOURCE AREA~~
P.O. Box 460
Cedarville, CA 96130

9/87

IN REPLY REFER TO:

4120(CA-028)
Tuledad AMP

Copied from file

~~TULEDAD AMP EVALUATION SUMMARY~~

1. DESCRIPTION OF GRAZING PRACTICES

A deferred rotation grazing system utilizing eight pastures has been the method of management in this Allotment for six years. Each of the eight pastures is used during different time periods based on range readiness of the pasture.

<u>Pasture</u>	<u>Season of Use</u>	<u>Cycle</u>
Tuledad Seeding	04/01 to 04/30	Each year
Worland Seeding	04/01 to 04/30	Each year
Bare Pasture	04/16 to 05/30	Alternate year
Rye Patch Pasture	Rest	Alternate year
South Pasture	06/01 to 07/31	Alternate year
North Pasture	08/01 to 09/30	Alternate year
Cottonwood Mtn. Pasture	07/16 to 09/30	Each year
Boot Lake Pasture	07/16 to 09/30	Each year

April use on native range by cattle has been reduced by 78 percent. Sheep use has remained the same with the exception of moving lambing locations around within the Allotment. Sheep have also been herded to avoid certain bitterbrush areas during the six years.

Moderate utilization has been the key management criteria for livestock during the evaluation period.

2. SUMMARY OF RESOURCE OBJECTIVES

- Initiate and maintain an upward trend toward range site potential.
- Demonstrate a statistically significant increase in ground cover (including litter) within six years on key study plots.
- Increase canopy cover of rushes, sedges, and grasses to 90-100 percent (reduce bare ground 0-10%) within six years on all wet meadows and riparian communities.
- Demonstrate a statistically significant increase in perennial grass basal cover within 12 years on key study plots.
- Increase livestock productive capacity (i.e. increased calf crop, increase lamb and calf weights).

- c. Eliminate statistical significance statement from the perennial grass basal cover objective.

"Increase perennial grass basal cover in 12 years on key management areas."

- d. Develop watershed objectives for specific areas in the Allotment. Coordinate watershed plans with the AMP.

Example:

"Maintain soil loss levels at or below the accepted soil loss tolerance value for soils in key areas."

- e. Continue with deferred rotation grazing developed during the evaluation period.
- f. Continue with the season of use specified for each pasture, for both cattle and sheep.
- g. Continue with current active stocking rate for cattle and sheep.
- h. Future water development should be funded primarily by the permittees.
- i. The proposed Rye Patch Seeding should be dropped due to the limited success of two previous seedings in the area.

9-18-87



SIERRA CLUB

DEPT. OF INTERIOR

RECEIVED

SEP 21 1987

Toiyabe Chapter — Nevada and Eastern California
P.O. Box 8096, Reno, Nevada 89507

BUREAU OF LAND
MANAGEMENT
CEDARVILLE, CALIFORNIA

September 18, 1987

Lee Delaney, Manager
BLM/Surprise Resource Area
PO Box 460
Cedarville, CA 96130

Dear Lee,

Sorry I could not reach you by telephone today. The Tuledad and Bare evaluation summaries popped up to the top of my stack of things to do yesterday and I had a thousand questions to ask you about them.

The Tuledad evaluation summary and your letter raised far many more questions than it answered about whether current management and livestock numbers are adequate or should be changed. Perhaps the answers are in the full evaluation. If so, please send the full evaluation to me and I'll figure out the answers. If not, then I will need additional information in order to provide you with informed input on the proposed grazing decisions, assuming that the decisions have not yet been made.

1. I do not understand the statement in your letter of August 12, 1987 that "I don't perceive there will be any changes to the Tuledad/Home Camp MFP. Particularly since this MFP does not contain season of use or forage allocations." This is not my understanding of the MFP or of the grazing decisions of April 26, 1979. Specific numbers and seasons of use are part of the land use plan and significant changes would require amending the land use plan. Please clarify.

2. Basic information about the allotment on which the staff recommendations are assumedly based is omitted from the evaluation summary. For example, nowhere is disclosed how many livestock are using the allotment.

3. It is impossible to tell whether key resource objectives have been met and it appears that most of the objectives have not been met. The "results" under the section on summary of resource objectives appear intentionally misleading.

Granted that Resource Objective (a) is not specific, the "result" is unacceptably vague. Where has upward trend been initiated - in one trend plot? two plots? one area? all areas?

Resource Objective (b), on the other hand, is very clear. Does the monitoring demonstrate a statistically significant increase in ground cover (including litter) within six years on key study plots? Yes or No? The "result" - "total ground cover increased on transects measured by the Daubenmire cover method"- MAY relate to the objective, but is not a direct response.

Likewise, Resource Objective (c) is quite specific. Has the canopy cover of rushes, sedges, and grasses increased to 90-100 percent (reduce bare ground 0-10%) within six years on all wet meadows and riparian communities? Unfortunately, the "result" is equally vague and not to the point.

Resource objective (d) has not been met according to the "result."

Resource objective (e) has not been met.

Resource objective (f) was met at the end of the evaluation period.

Resource objective (g) has not been met.

Again, I cannot tell if resource objective (h) has been met since the "result" is too vague and not to the point.

Resource objective (i) depends on meeting resource objective (a), but "result" (a) is not explicit.

4. Staff recommendations were extremely disappointing and inappropriate considering the failures to meet Plan objectives. In response to the failures of the current grazing management plan to meet most of the Resource Objectives, the staff proposes weakened AMP Objectives rather than to revise the AMP and change the grazing system and numbers of livestock which are causing the problems.

We totally object to ALL staff recommendations on Tuledad AMP objectives, on the grazing system, and on the stocking rate. Instead, the AMP objectives, the grazing system, especially seasons of use, and livestock numbers should be adjusted to meet the Resource Objectives.

In regard to the Bare evaluation summary, we have the same problems with vague "results." From the summary, it appears that there may be actual improvements occurring in the Bare Allotment, but the information presented is not adequate on which we can feel any confidence. Likewise the staff recommendations may be appropriate, but without more specific information, we are unable to support them.

Lee, if the Tuledad and Bare evaluation summaries are examples of how the Bureau is going to solicit public participation in public land decision making, I am very pessimistic about the results. If the Bureau does not intend to exclude anyone from the monitoring and evaluation processes on which grazing management decisions are supposed to be based, then the agency must provide adequate information on which informed participation can be based. The public, not just the permittee and agency personnel, should be involved BEFORE the Bureau makes a grazing decision, not afterwards where the only recourse is protests and appeals.

If the staff recommendations on the Tuledad Allotment are an example of how the Bureau is going to use monitoring data on which to base grazing decisions and of how the Experimental Stewardship Program is improving public land resource management, I'll admit that we are very disappointed.

Let me take this opportunity to inform you that the Sierra Club wants to be involved in every grazing decision in the Surprise Resource Area. Since our concerns are not represented on the Experimental Stewardship Program Committee or the District Advisory Committee, we want to participate directly in the decision making process with the Bureau.

We will make every attempt to participate in a timely manner. Two weeks is not generally adequate time for our volunteers to analyze a document and make recommendations to you. Please involve us earlier on in the process or provide more time for comments.

If you have made grazing decisions on the Bare and Tuledad Allotments similar to those recommended by staff, let us know immediately as we will be forced to initiate administrative appeal procedures.

Sincerely,

A handwritten signature in cursive script that reads "Rose Strickland". The signature is written in dark ink and is positioned below the word "Sincerely,".

Rose Strickland, Chair



SIERRA CLUB

Toiyabe Chapter — Nevada and Eastern California
P.O. Box 8096, Reno, Nevada 89507

October 21, 1987

DEPT. OF INTERIOR

RECEIVED

OCT 26 1987

Lee Delaney, Manager
BLM/Surprise Resource Area
PO Box 460
Cedarville, CA 96130

BUREAU OF LAND
MANAGEMENT
CEDARVILLE, CALIFORNIA

Dear Lee,

Thanks for the visit from Roger, Rick, and yourself to discuss the Tuledad Allotment evaluation summary.


I wish I had come away from the meeting as confident as you that the grazing system is working and that livestock numbers are at a proper level. But my reactions are far different. Some of my conclusions follow:

1. Allotment monitoring is inadequate on which to judge changes in trend and condition. There are not enough sites and existing sites are not in the best places to evaluate vegetative changes.
2. From what little monitoring has been done, the current grazing numbers and system are resulting in insignificant improvements in range condition and trend. It appears that we're barely staying static in large areas of the allotment. Where gains have been made, they are statistically insignificant.
3. Proposed changes to key resource objectives (which were substantially not met) appear to weaken the objectives, not improve them.
4. Not enough management attention is being given to riparian areas on the Tuledad. While some improvement has been observed (not measured) in some drainages, the AMP does not require an orderly assessment of riparian areas, their conditions and trends or management requirements, nor any specific management actions to meet those requirements.
5. The evaluation summaries on the Tuledad and Bare allotments do not contain the level and amount of information on allotment use, monitoring of condition and trend, and management actions necessary for informed comment from the Sierra Club or other individuals or groups not intimately involved in day-to-day allotment activities.

In conclusion, I made many suggestions during the course of our meeting for improvements in the evaluation summary and proposed management decisions for the Tuledad allotment. I'll be glad to review a new format on the evaluation summary. I'm looking forward to the final evaluation and grazing decisions which I requested be sent as soon as they are ready. You said you would send me a copy of the full evaluation, as well as copies of the maps you used during our meeting. I have not yet received this information.

Thanks again for the visit. I'd rather that Sierra Club input be more on the front end of the evaluation process rather than a kind of catch-up when BLM conclusions and recommendations are published and more or less set in concrete. Without some improvements in the process, evaluations are going to be frustrating for both the agency and the public.

Sincerely,

A handwritten signature in cursive script that reads "Rose".

Rose Strickland, Chair

November 9, 1987

Rose Strickland
619 Robinson Court
Reno, NV 89503

Dear Rose:

I want to express my appreciation for your time with us. It's often overlooked that volunteer time such as this is as important as that volunteer time we receive on-the-ground. I really enjoyed the day and deeply appreciate your input. It was constructive and has certainly caused me to think about our process and how it can be improved.

In relation to Tuledad, I have changed course and decided that a TRT would be helpful in resolving the issues and determining future management for the area. Therefore, we won't be making any decisions until next summer. We'll probably schedule the TRT for June or July. We are going to spend some time in the field with NDOW this week to look at things together. We are still worlds apart in our perceptions of what is occurring on the ground. We are in the process of incorporating your thoughts into the evaluation and will send you a copy when it is final.

In response to your letter, I agree totally with points 3, 4, & 5. As we said earlier, the recommendations for new or revised objectives were only food for thought. Rick has completely reworked them and they will be included in the final evaluation.

Your are right in that riparian management was not emphasized in the existing AMP. The key issues when the AMP was developed were early livestock turnout and bitterbrush. This is why we reduced April use by 78% on native range and knocked four weeks off the end of the grazing season. Although riparian management was not specifically addressed in the AMP, that's not to say that it was not considered. It was our feeling that the two pasture deferred system would not result in acceptable upland or riparian improvement and that is why a two pasture rest system was identified as the final system. Admittedly, the results on riparian areas are a mixed bag at this point. Some meadows have responded dramatically while other's haven't. The next logical step, as Rick has recommended, is to develop specific management proposals for those areas that have not responded. These would be reflected in the revised AMP.

I also agree that the evaluation summaries fall far short of providing adequate information. If we go with summaries in the future, we will include your ideas and more background information. However, if we are only working with a few people in the evaluations, we probably will provide the whole evaluation instead of a summary.

We could discuss point #1 until you are as gray haired as I am! I have put a great deal of thought into this aspect plus the results aspect (point #2) of our monitoring program in the Resource Area. I have concluded that any monitoring effort and data is adequate only when it meets someone's expectations. For example, I don't think you would have had much problem with the adequacy, location, results, statistical significance, etc. if we had determined the monitoring data indicated a reduction was necessary in Tuledad. However, the permittees would disagree based on exactly the same reasons you had. I can speak from experience on this as we heard the same arguments from the permittees when we were writing the EIS's.

I'm not raising this point to be argumentative or to try to gloss over the problems of the Tuledad evaluation. I do firmly believe the monitoring is adequate (your point #1) and have complete confidence in Rick's and Roger's professional judgement (your point #2). But I'm not convinced this is really the problem as the Bureau's data has historically been challenged and more often than not, stood the test. I'm starting to believe that the problem is that we (meaning BLM, other agencies and the public) have not clearly defined our expectations at the outset so at the mid-points or end-point, the monitoring data and judgements are scrutinized under totally different sets of criteria. Another ripple affect of not clearly defining expectations is that the ability to meet those expectations is not evaluated in depth from either an agency or resource base standpoint which then creates a whole different set of expectations.

Examples of these problems are that good riparian conditions mean different things to different people and vary from one riparian system to another. Which means in Tuledad for example, we have either "done good" or failed depending on what set of criteria and riparian system we are looking at. Also, NDOW was completely surprised that it had taken six years to accomplish some of the major tasks needed to support the AMP. Their expectation was that everything was in place from day one (i.e. fences, horse removal, seedings, water, etc.). This indicates that we had not clearly articulated our ability to build projects, etc.

Well, I've rambled on at length. In summary, I agree with your points 3, 4 & 5. I feel points 1 & 2 can be debated indefinitely depending what side of the fence they are viewed from. I'm convinced that until we deal with expectations and the ability to meet them, the BLM or any other resource management agency will never be able to monitor and make decisions that will be acceptable to everyone. I'm not so naive to believe that we'll ever be able to satisfy everyone but I think we have better consider further refinement of our process now or the Bureau is facing annual wrestling matches over the evaluations. I think these will only result in delaying management adjustments when they are needed.

Well Rose, I've laid some new found Delaney philosophy on you. I really do appreciate your input and would like your thoughts on my latest ideas. I'm going to approach the Stewardship Committee to reconvene the monitoring subcommittee. My objective is to have them review our whole process to see where it can be strengthened. Maybe you would like to serve on that subcommittee?!

I better close for now. Again, I want to thank you for your time and input. We should finalize the evaluation in the next couple of weeks and will send you a copy.

Sincerely,



Lee Delaney
Surprise Resource Area Manager

LDELANEY:we 11/9/87

7-7-87



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RICHARD H. BRYAN
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July 7, 1987

Mr. Lee Delaney
Surprise Resource Area Manager
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DEPT. OF WILDLIFE
RECEIVED
JUL 13 1987
BUREAU OF LAND
MANAGEMENT
CEDARVILLE, CALIFORNIA

RE: Tuledad AMP Evaluation

Dear Lee:

The Nevada Department of Wildlife appreciates the efforts of the Susanville District to provide information and allow participation in the evaluation of this allotment. Our agency has a vested interest in the progress and future management of this allotment that represents the first allotment management plan developed under the auspices of an environmental impact statement.

Our involvement in the development and implementation of range projects associated with Tuledad began in 1976 at the onset of the EIS. At completion of the AMP, (March 1980), our agency had the following concerns:

1. The AMP did not adhere to the final grazing decisions dated April 26, 1979. The proposed stocking rates and season of use are the same as previously occurring under active license use, therefore, no change in range condition can be expected.
2. The three proposed seedings are designed to delay turnout on native range. The Department does not feel that wildlife values should be sacrificed in order to accomodate early grazing and existing stocking rates.
3. The AMP does not allocate forage to reasonable numbers of wildlife nor consider the maintenance requirements of wildlife or attendant habitat
4. Criteria for the proposed seedings are not stated nor adhered to as discussed. Criteria at the time was:

Mr. Lee Delaney
July 7, 1987
Page Two

- a. Seedings be limited to areas not expected to respond to management in a reasonable time.
- b. Adequate ecological factors to support a seeding.
- c. Avoid critical wildlife habitat.
- d. The cost/benefit ratio must be positive.

On our acceptance of the final document on May 15, 1980, the Department expressed the fact that previously stated concerns remained pertinent and relative to the implementation of the plan. It was further stated that a strong monitoring system was essential to address our concerns and make appropriate management decisions. Based upon our prior concerns, the implementation of range improvements, range monitoring data and the evaluation of this allotment, we offer the following comments.

Stocking rates were not adjusted in the duration of this evaluation period. Non use taken upon the Tuledad Allotment is considered insignificant, less than four percent of active licensed AUMs, during the evaluation period. Stocking levels, including wild horses, has averaged 11,161 AUMs (Range:10,094 to 12,771 AUMs) over the evaluation period.

The rest rotation system part of the AMP has never been fully implemented. The wild fire loss of Cottonwood Mountain required a two year rest by policy and thus resulted in yearlong use of the North Pasture.

Season of use has remained consistent to practices prior to the EIS. Key species of this allotment such as Idaho fescue, Thurber's needle grass, bluebunch wheatgrass and bitterbrush do not enter the "boot stage" prior to May 1 each year. Bitterbrush does not peak in flowering until the first week in June. Turnout dates for livestock of April 1 for cattle and March 26, for sheep coincide with seasonal use by mule deer and provide no relief or growth period of key species. Recent helicopter surveys for antelope in the spring have resulted in numerous observations of conflicts with domestic sheep. Antelope are believed to be in direct competition with lambing ewes on kidding grounds. Antelope are being observed at considerable distances from domestic sheep and are occupying less than optimum habitat while kidding. At this point in time, the Department cannot estimate the degree of this conflict.

We have concluded that the Worland and Tuledad Seedings are failures in attempts to create greater livestock forage on the allotment. These projects, and the proposed Rye Patch Seeding, lack the criteria developed in 1976. The concept of developing additional AUMs to delay early turnout for livestock, does not appear to be feasible in this evaluation.

Mr. Lee Delaney
July 7, 1987
Page Three

In the previous planning process of the District, management objectives were set to allocate forage for reasonable numbers of wildlife. During the development and early implementation of grazing EISs, the livestock industry challenged the use of range inventory data for livestock adjustments. Range monitoring became, and now is established as, the only method to establish season of use, stocking rate and proper utilization levels. Therefore, our agency must emphasize the maintenance, protection and enhancement of wildlife habitat that is commensurate to the multiple use concept. In the Tuledad Allotment, the bitterbrush community and all riparian zones are considered key wildlife habitat.

Bitterbrush monitoring data is inconclusive to determine the cause of over utilization and/or other factors influencing its unsatisfactory condition. Terminology used in the evaluation suggest that neither the monitoring effort nor methodology suffices the management needs for this allotment. Riparian monitoring was too limited to properly establish the status and trend of this habitat. Utilization mapping clearly illustrates that severe utilization of major riparian zones have and is occurring under present management. Evaluation narratives describing vegetational responses to riparian enclosures emphasize the remarkable recovery and enhancement of limited stream zones.

As a result of this evaluation, review of the Tuledad-Homecamp Decisions and our ten year involvement in the planning processes, we offer the following recommendations:

1. Maintain management objects of this document. Reasonable numbers are recognized as obsolete under the monitoring concept of range management. Numbers of big game are not monitoring indices or indicators of the condition of wildlife habitat.
2. Adjust stocking rates, seasons of use and grazing systems as stated in the Tuledad-Home Camp Decisions issued April 26, 1979.
3. No Seedings or sprays in occupied wildlife habitat.
4. Manage livestock on proper utilization levels of key species.
5. Develop reliable monitoring techniques to properly evaluate and to significantly prove the progress or attainment of stated management objectives.
6. All range improvements must have a positive cost/benefit ratio.

Lee, I hope the above comments will assist and support the District in resolution to problems that appear to persist on the Tuledad Allotment.

set new obj. as needed

maintain existing

no problem

no problem

may never attain every time we evaluate

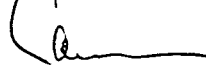
no problem

bitterbrush cause/effect

Mr. Lee Delaney
July 7, 1987
Page Four

We wish to continue consulting and assisting you in the evaluation processes.
If there are any questions or need for additional information, please advise.

Sincerely,



Sam Millazzo
Regional Supervisor
Region I



United States Department of the Interior

6200(CA-028)

BUREAU OF LAND MANAGEMENT
CEDARVILLE RESOURCE AREAP.O. Box 460
Cedarville, California 96104

July 22, 1987

Sam Millazzo
Regional Supervisor, Region I
Nevada Department of Wildlife
380 West "B" Street
Fallon, NV 89406

DRAFT

Dear Sam:

Thank you for your comments and recommendations on our Tuledad Allotment evaluation. As you are probably aware, the evaluations conducted on the Bare and Tuledad Allotments this year are the first evaluations conducted at this level by California BLM so we are concerned about not only the on-the-ground information but the process of evaluating the progress of grazing management. Input from the Department of Wildlife is an important part of our evaluation and we hope to receive professional input to future evaluations.

We do have some concerns that the Department missed some key points in the evaluation and also to request additional information on wildlife populations to allow our evaluation to be complete.

Your letter reiterated the concerns of the Department in 1980 and serve as a basis for your comments. It would be helpful to also restate BLM's thinking from 1980 when the Tuledad AMP was put together. At that time BLM made the decision to enter into an interim grazing system on the Tuledad Allotment. This decision involved three separate pressures. First, the BLM's goal to improve ecological conditions (including wildlife habitat) as directed by our planning; secondly, NDOW's concerns about wildlife populations and habitat; and lastly the livestock operators concern for April use and the economic problems of reductions. The interim system certainly was not identified as first choice by any of the parties concerned. Since 1980, the interim system has evolved in response to a number of factors including two wildfires, new fences, additional waters and two seedings, periods of rest, periods of deferment, and later turnout dates.

The evaluation is an attempt to put all the information acquired over the past seven years in one place and recommend a course of action for the Tuledad Allotment in the future.

The basis on your concerns appears to be based upon a lack of understanding of the grazing system and how that affects season of use, stocking rates, utilization levels and the monitoring results. Although usually described as a two pasture grazing system, the Tuledad Plan has evolved into a nine pasture system (eight pastures during the evaluation period). The eight pastures received a range of grazing treatments from yearly spring use (seedings), spring use alternating with rest, spring use one year alternating with late use and yearly late use.

DRAFT

Stocking rates were within 4% of active use, however, the stocking rates on native range have been reduced by an additional 5% by the additional forage provided by the two seeded fields. More importantly, is the impact of the seedings on the April use. Since completion of the seedings, April cattle use has been reduced by almost 80% over pre-AMP use levels. This shows that your conclusion of failure for the seedings and your assertion of that delaying early turnout is unfeasible are certainly incorrect. The season of use and amount of early use has not changed significantly for the sheep grazing. Our data has not pointed out problems with the early sheep use. Your studies indicate some behavioral interaction between the sheep and antelope and postulate some direct competition. Your published data do not support the implication that domestic sheep grazing has an impact on kid production. The summary data shows that Area 1C has the highest kid production in North Washoe. We would encourage you to set up a strong monitoring effort to assess the antelope/sheep interaction.

You imply that our livestock turnout dates impact the key species. Our utilization studies indicate that almost no use occurs on the major upland sites containing the key species prior to June 1. The late April/May use is made on the low elevation ranges dominated by squirreltail, bluegrasses and cheatgrass.

We agree that the continuation of a strong monitoring system is imperative. The monitoring data collected for the evaluation was an attempt to cover all the bases. The evaluation showed us weaknesses of some of our techniques and problems with transect coverage. The bitterbrush assessment needs to be revisited with the goal of fine tuning the impacts of each ungulate using the site. Any suggestions on how to pull the deer and antelope use out as separate components would be appreciated.

Riparian monitoring relied primarily on the ten photo points established in 1984 and 1985. The one cover transect allowed for comparison of matched photos. The utilization problem in riparian zones was picked up through our monitoring system and in 1986 a fence was constructed by the permittees to eliminate severe use zones in the Tuledad and Express drainages.

The six recommendations you made for the most part concur with the staff recommendations in the evaluation. Some clarification appears to be needed to explain the differences between the evaluation and your recommendations.

Recommendation 1 requests that we maintain the objectives of the Plan. Several of the objectives were based upon a six year timeframe, and therefore, are retired as objectives. We will develop new objectives to replace the retired objectives with new timeframes.

You also indicate that the reasonable number objective should be abandoned. We concur that big game numbers are not monitoring indices, but to complete the loop on the objectives we request your data on the Nevada portion of the Allotment. This will allow us to complete the rationale for elimination of the objective.

Recommendation 2 requested that we implement the final decision of 1979. The staff recommendation is to maintain the current system, season of use and

DRAFT

stocking rate. The AMP clearly states that if the interim system is accomplishing the goals then it will be continued. During the first six years, we have seen improvement in the ecological condition of the Allotment with several exceptions discussed below. The early grazing has been significantly reduced, the major use areas are not exceeding moderate use, all of the Allotment is receiving regular periods of rest or deferment and additional livestock forage has been made available to reduce use on native range. Bitterbrush is still a problem, but the data seems to point to less of a role for cattle and more use associated with deer and antelope than was projected back in 1979 and 1980. Riparian concerns are still an issue, but the improvement observed has surprised and pleased everyone with on-the-ground experience. Riparian objectives and projects have been neglected over the past six years. With the current emphasis on riparian conditions, riparian management will receive a great deal of attention during the next six years. The staff feels that the current course is working and with minor modifications can continue to meet the needs of all the resources and interests.

We have recommended against the development of any further seedings in the Tuledad Allotment. The two existing seedings have not been as productive as anticipated. We request some clarification on what you meant by occupied wildlife habitat, as every acre in our Resource Area is wildlife habitat.

We concur with your Recommendation 4 that livestock should be managed for proper utilization levels. This is part of our decisions and AMPs. We have used utilization data to encourage permittee completion of the fence completed last year to eliminate concentrations in Express and Tuledad Canyons.

We agree that reliable monitoring techniques are important to assess the progress of management actions. It should be recognized that professional judgement is easily as important as any transect data and the combination of the two are critical for evaluation of management actions.

Recommendation 6 requests that all range improvements have positive benefit/cost ratio. This is BLM's policy. In the Tuledad Allotment, the staff recommendation is that future range projects be funded primarily by the permittees, as all the projects identified in the AMP have been completed.

I hope that this clarifies some apparent misunderstandings that our evaluation of the Tuledad Allotment may have created. We look forward to receiving the big game numbers needed to complete our records and stand ready to discuss the future management of the Tuledad Allotment with the Department of Wildlife.

Sincerely,

Lee Delaney
Surprise Resource Area Manager

RFARSCON:we 7/21/87

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DEC 3 1987

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November 24, 1987

Mr. Lee Delaney
Surprise Resource Area Manager
Bureau of Land Management
P.O. Box 460
Cedarville, CA. 96130

RE: Tuledad AMP Evaluation and Tour

Dear Lee:

We appreciate your time and that of your staff in reviewing the condition of wildlife habitat in connection with the provisions of the Tuledad Allotment Management Plan. It is a unique opportunity to meet and discuss the specific data and analysis at each site monitored by the District. We feel more informed and cognizant of the District's perspective as a result of being included in the evaluation of this allotment.

As observed in California on the Bare Creek Pasture and North Pasture, bitterbrush stands have improved in condition class due to the apparent lack of livestock utilization. As explained by Roger, the improvements were due to the high precipitation year of 1983 and lack of heavy ungulate use. The growth forms clearly show a change in animal class usage of bitterbrush since 1983. The result appears to be more productive and vigorous stands of bitterbrush, although recruitment is not evident. It was also noted that juniper encroachment is occurring which could jeopardize the future of these bitterbrush stands.

It was observed in the bitterbrush stand in Nevada along the Buckhorn Road in the South Pasture, that bitterbrush was over utilized and dying as a result of cattle use. Though the District's current monitoring data cannot determine the type of herbivore usage, the form class of bitterbrush and utilization of perennial grasses strongly suggest cattle. It was also apparent that this particular site warranted a period of rest to allow for bitterbrush restoration and perhaps a 20 percent increase in basal area of perennial grass cover.

Riparian zones in the allotment are unique in most cases with a large component of rock in their substrates. It was generally observed that these riparians received heavy to severe use during 1987 but did not show significant amounts of headcutting or erosion. Due to the

Mr. Lee Delaney
November 24, 1987
Page Two

limited size of these riparians and their extreme importance to wildlife diversity, we find little opportunity to develop riparian pastures or utilization levels that are practical.

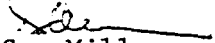
We wish to submit several recommendations or alternatives to the District to assist in achievement of the allotment objectives and associated decisions of the land use plan.

1. In all areas where bitterbrush is not in a satisfactory condition:
 - a. Provide a minimum of one year rest to restore plant vigor and condition class.
 - b. Adjust livestock numbers and the season use to achieve moderate utilization levels of key species.
 - c. Establish monitoring studies to detect livestock class and utilization levels.
2. In all riparian zones where the management objectives are not being met:
 - a. Fence to exclude livestock use.
 - b. Adjust livestock/wildhorse numbers and/or season of use to achieve moderate utilization levels.
 - c. Establish specific management objectives for lake bottoms and develop monitoring studies to maintain or protect these riparian zones in fair to good condition.

It is our assumption based on recent evaluation proceedings, that rest rotation has not and will not occur under the present AMP. As a result it is feared that livestock competition in Nevada on key big game habitat will be severe. Sites visited on the most recent tour suggest that these conflicts can be resolved in the short term with greater management emphasis. Interim measures of the Tuledad Allotment Management Plan are considered exhausted and stronger measures will be needed to improve wildlife habitat.

We hope the above comments will assist the District with the preparation of the evaluation and necessary management decisions. If there are any questions or need for additional information, please advise.

Sincerely,


Sam Millazzo
Regional Manager
Region I